

OFFICE MANUAL, SECTION 7

FATIGUE MANAGEMENT

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KEY

[A31] = Electronic Folder Reference

REVISION TABLE

Revision	Date	Comments
1	27/05/2015	-
2	23/07/2018	Update for safety critical work consideration
3	14/07/2020	Employee responsibilities added
4	09/07/2021	Update to Table 1
5	04/07/2025	Update to section 4.1, 5 and 6. Minor text editing.
6	30/07/2025	New section 3.4 added
7	08/07/2026	Minor rewording to Policy Statement, section 5.1, 5.2, 5.3, 6, update to section 2, 3.1, 3.2, 3.3, 4, new section 3.4

1. FATIGUE MANAGEMENT POLICY STATEMENT

Management systems are in place to ensure that Robert Walpole and Partners complies, as far as is reasonably practicable, with the requirements of:

- a) legislation (Health and Safety at Work Act 1974),
 - b) regulations (Management of Health and Safety at Work Regulations 1999, Working Time Regulations 1998, Railways and Other Guided Transport Systems (Safety Regulations),
 - c) and standards (Network Rail NR/L2/OHS/003, London Underground S1548)
- for the management of fatigue and working hours.

These management systems outline the control and monitoring procedures to ensure that staff under the management, supervision or control of Robert Walpole and Partners do not carry out work in circumstances where they are so fatigued or would be liable to become so fatigued that their health or safety or the health or safety of other persons on the transport system could be affected.

All our work is planned in such a manner to include adequate breaks and rest periods. Exceedances must only be considered in extreme circumstances and require authorisation by a member of senior leadership team.

This Fatigue Management Policy Statement will be reviewed annually by the Partners and revised as circumstances require.

All staff will be briefed on this policy statement.

Signed: M.J. Walpole

M.J. Walpole
Partner

Date: 2026-07-08

2. WHAT IS FATIGUE?

Fatigue is one of the contributing factors of many accidents but can also increase risk of health problems. Being awake for around 17 hours has been found to produce impairment on a range of tasks equivalent to that associated with a blood alcohol concentration above the drink driving limit for most of Europe. Being awake for 24 hours produces impairment worse than that associated with a blood alcohol concentration above the legal limit for driving on the UK's roads.

Guidance issued by the Office of Rail and Road (ORR) defines fatigue as 'a state of reduced mental or physical capability resulting from sleep loss or extended wakefulness, disruption to circadian rhythms (the 'internal body clock'), workload (mental and/or physical activity) and/or prolonged working that can impair alertness and the ability to perform safely and/or effectively' ([ORR website](#) access on 06/07/2026). It will affect individual's:

- a) vigilance and monitoring,
- b) ability to process information,
- c) decision making,
- d) awareness,
- e) reaction time,
- f) tracking ability,
- g) memory.

The most serious potential fatigue risk at Robert Walpole and Partners (RWP) is work-related driving.

3. WORKING HOURS

3.1. Legal Duties

Working hours are governed by The Working Time Regulations 1998 (including any further amendments). These Regulations state that workers:

- a) can work an average 48 hours a week.
- b) have right to 11 consecutive hours' rest in any 24-hour period.
- c) have right to a 20-minute break if the working day is longer than 6 hours.
- d) have right to 1 day off each week (staff are entitled to 24 hours uninterrupted rest each week or 48 hours each fortnight).

For the purpose of fatigue management hours of work are defined as actual time spent working at the employer's disposal and include any:

- overtime,
- rest days worked,
- paid travelling/walking time,
- handover/wash-up time,
- paid meal/rest breaks,
- hours of work when travelling to and/or working at a location that is not at a normal place of work (e.g. working from home, home start arrangements).

Under the Working Time Regulations 1998, workers in the UK are legally entitled to at least 11 consecutive hours of rest between finishing one shift and starting the next. If an employer cuts this rest time short, they must provide equivalent "compensatory rest" (time off) to make up for it.

3.2. Shift Patterns and Compensatory Rest

Typical shift patterns used by the business are indicated in Table 1. RWP normal working shift is 8 hours. A planned extended shift of 10 hours is permitted. A 12-hour shifts should be avoided if possible. If that is not achievable, then a minimum 2.5 hours compensatory rest period must be taken within the next two working shifts, or at the end of the shift pattern.

Table 1: Typical shift patterns

Type of shift	Site location	Typical travel time (hours)	Typical working time (hours)	Contingency time* (hours)	Total time (hours)
Daytime	Office	2	8	2	12
Engineering Hours	LUL / NR	2	4	6**	12
Daytime / Traffic hours	LUL / NR / Other	2	8	2	12
Night time	Other	2	6	4**	12

*Contingency time allows for additional working or travel time if required, before limits are reached.

**Working time for regular night shifts still limited to 8 hours total. Single shifts may use the full allowance.

There are additional provisos with regards to regular and frequent night workers limiting their normal working hours to 8 in any 24-hour period and an entitlement to receive regular health assessments. Staff undertaking a mixture of day and night works should plan to finish their immediate shift prior to a night shift no later than at 13:00 and should plan not to return to the office until they have achieved their 11 consecutive hours' (plus any compensatory) rest.

3.3. Safety Critical Work

Under the standards and regulations of London Underground (LUL) or Network Rail (NR) stricter working time limits apply to staff undertaking safety critical work. These are:

- a) No more than 12 hours to be worked per period of duty/shift;
- b) No more than 72 hours to be worked in any seven day period;
- c) A minimum of 12 hours rest between booking off from a period of duty/shift to booking on for the next period of duty/shift;
- d) No more than thirteen periods of duty to be worked in any fourteen day period.

Robert Walpole and Partners does not currently undertake safety critical work (as defined by [ROGS 2006](#)) in a rail environment.

3.4. Exceedance criteria

An exceedance shall be declared by RWP when any of these conditions are or might be reached:

- a) a person exceeds 60 hours of working in a rolling seven-day period. This shall be classed as a level 1 exceedance;
- b) a person exceeds 72 hours of working in a rolling seven-day period. This shall be classed as a level 2 exceedance;
- c) a person receives less than 11 hours break between booking off from their shift / period of duty and booking on for their next shift / period of duty;
- d) a person works more than 12 hours in one shift or period of duty;
- e) a person works more than 13 consecutive turns of duty in 14 rolling days;
- f) a person exceeds 14 hours door to door.

4. MONITORING

Compliance with the defined working hours is monitored by regular review of timesheets. The findings are reviewed by members of senior leadership team at regular intervals. All staff must record their working time using the company's timesheet system. Accurate time logging is essential for billing, cost tracking, health and safety, and fatigue monitoring. It helps ensure compliance with working hour thresholds, rest periods and potential exceedances of working time limits.

Timesheets must be completed as work progresses and submitted daily. Consistent non-compliance will be treated as a disciplinary matter. Each entry should include:

- a) Project or Administrative job code
- b) Start time
- c) Breaks taken
- d) End of day
- e) Brief work description (as applicable).

Refer to '[Timesheet Entry Examples](#)' guidance for typical records. Return travel time to out of office sites (door to door) is taken into consideration when assessing rest periods and needs to be recorded as working time on timesheets.

5. FATIGUE MANAGEMENT

5.1. Fatigue assessments

The Safety Officer or a person nominated by Safety Officer, shall undertake fatigue assessments when:

- a) it is identified that an employee exceeded or might exceed any of the above thresholds.
- b) an employee has asked for a fatigue assessment to be undertaken.
- c) a fatigue assessment is required to provide supporting information for a risk assessment or investigation.

Details to be included in a fatigue assessment documentation shall be in line with Network Rail standard NR/L2/OHS/003/04 (*Fatigue assessment and fatigue management plans*) or equivalent. Outcomes of the fatigue assessments guide workload or shift adjustments.

5.2. Fatigue management conversation

The Safety Officer or a person nominated by Safety Officer, shall also conduct a fatigue management conversation with any staff member who has returned to work after:

- a) extended absence (including maternity/paternity leave and long-term sick leave); or
- b) where flexible or compressed working arrangements have been requested; or
- c) where there is a need to amend working hours.

5.3. Opt-Out Agreement

Robert Walpole and Partners recognise that to complete certain tasks exceedances of the above limits might be required. These tasks vary greatly in scope and will be planned and managed on a case-by-case basis to minimise risks to staff and their surroundings. Any overtime is to be undertaken voluntarily, and the exceedance must be authorised by a member of senior leadership team following appropriate risk assessment.

Employees can choose to work more than 48 hours a week on average provided that they:

- a) Are over 18 year old
- b) gave a written consent by completing 'Opt-out Agreement'.

6. EMPLOYEE RESPONSIBILITIES

All employees need to comply with this policy and are expected to arrive at work adequately rested to undertake their tasks safely.

All employees are responsible for reporting to the Safety Officer any areas at work (including other employment) or outside of work (for instance health conditions or personal circumstances) that might increase their risk of fatigue.

All employees are reminded that they should not drive whilst experiencing effects of fatigue. If any employee is too tired to work safely, whether on site or in the office environment, he or she needs to report that fact to their immediate manager or supervisor who will advise the next course of action.

Employees working from home or in remote settings should apply the same principles of fatigue management as they would in the office or on site. This includes taking regular screen breaks, maintaining a defined work schedule with a clear end-of-day, and ensuring their working environment promotes alertness and comfort. Staff should avoid extending work hours into rest time and are encouraged to report any difficulties in managing fatigue while working remotely to their manager or the Safety Officer.

All employees are to adhere to the expected maximum hours (daily and weekly thresholds). The Safety Officer shall be informed if you exceed or expect to exceed any of the working time limits defined within this policy. All such occurrences will be reviewed to verify if any additional control measures are required. The aim is to prevent excessive working hours and keep a fatigue related risks as low as reasonably possible.