

# Livestock Transport Fatigue Management Scheme

## Implementation Guide



Version: 1.0  
July 2015

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## Executive Summary

The Livestock Transport Fatigue Management Scheme (LTFMS) provides a pre-approved template Advanced Fatigue Management (AFM) accreditation system designed to give livestock and rural transporters the flexibility to respond to the dynamic, uncertain and complex livestock transport task.

Initially, the scheme allows AFM accredited operators to work up to 14 hours each day on a fortnightly cycle with ‘risk off-setting’ restrictions around driving between midnight and 4am and frequent stops for welfare checking. It is anticipated that the scheme will be extended to allow AFM accredited operators access to longer work days (for *Long Runs*) and the ability to pool hours across multiple days (for *Journey Flexibility*).

To access these hours, you will need to accredit your business in the AFM option of the National Heavy Vehicle Accreditation Scheme (NHVAS), including:

- putting a fatigue management policy/procedure in place,
- training your staff and drivers in it, and
- having your business audited.

If you are already running BFM or AFM, or if you have a documented fatigue management policy/procedure in place, you can adapt your existing system to access the fortnightly work cycle with minimal effort. New entrants can use the pre-approved template, which includes a wealth of supporting resources in the package, including ‘model’ policies, procedures and forms.

As a pre-approved template, you will not have to present a safety case to the NHVR.

This document:

- outlines a step by step process for obtaining accreditation using this guideline, and
- provides a template AFM Fatigue Management System on which operators can base their application.

## Before you start

The Livestock Transport Fatigue Management Scheme outlines specific principles, standards of behaviour and business practices that underpin good fatigue risk management for livestock and rural transport.

Whilst the package does include template policies, procedures and forms, you will need to review these and tailor them to your business.

If you already have business practices in place, even if they are not written down, you can document and keep these so long as they adequately cover the minimum requirements mentioned in the template and meet the AFM standards.

Specific guidance on how to implement the template, including key tasks you will need to undertake, is outlined in the section titled **Steps to implementing an FRMS in your company**.

Before you start, check that you've got the following documents:

- *Livestock Transport Fatigue Management Scheme: AFM Policies and Procedures*
- Livestock Transport Fatigue Management Scheme: Forms 1-12:
  1. *Safe Driving Plan*
  2. *Fitness for Duty Assessment*
  3. *Employee Fatigue Training Register*
  4. *Individual Employee Training Matrix*
  5. *Incident, Accident, Near Miss and Hazard Report Form*
  6. *Non-conformance Audit Report*
  7. *Internal Review Planner*
  8. *Quarterly Compliance Statement*
  9. *Non-conformance Corrective Action Report*
  10. *Internal Review Report*
  11. *Induction letter*
  12. *Chain of Responsibility Risk Assessment Template*
- *Chain of Responsibility guidance*

It is important that you read and understand all of the documentation before you begin. This initial effort could save your time and help you avoid mistakes as you implement the template in your business.

While using the template you will have to modify the template policies and procedures and forms and conduct a risk assessment which includes your own specific details, fatigue risks and countermeasures. All template documents have been created using Microsoft Word to allow you to do this.

It is important that you keep a copy of this implementation guide and all updated documents in a safe place as you go. Creating a specific folder on your computer will allow you to keep all your livestock template documents together, making them easier to find.

## Definitions

The following terms are used throughout this document.

Term	Definition
<b>Advanced Fatigue Management (AFM)</b>	An option introduced in the 2008 legislation that enabled an NHVAS accredited Operator to propose a trip plan for which they believed the risk associated with increased likelihood of fatigue due to longer working times had been adequately offset or mitigated by additional risk controls.
<b>Circadian Rhythm</b>	Also known as the body clock: a naturally occurring 24 hour cycle influenced by light that influences periods of wake and sleep. There is an increase in the desire to sleep at night, and a decrease in the desire to sleep during the day.
<b>Fatigue Risk Management System (FRMS)</b>	The AFM policy, procedures and forms that constitute a fatigue management system under the AFM Business Rules and Heavy Vehicle National Law.
<b>Prescribed Compliance History</b>	A compliance history for the operation listing: <ul style="list-style-type: none"> <li>• breaches against the HVNL or its predecessors,</li> <li>• an offence involving fraud or dishonesty punishable on conviction by imprisonment of 6 months or more,</li> </ul> by the applicant or other persons who are responsible for the business's AFM accreditation (e.g., schedulers).
<b>Sleep debt</b>	Sleep debt or sleep deficit is the cumulative effect of not getting enough sleep. A large sleep debt may lead to mental and/or physical fatigue.
<b>Sleep opportunity</b>	Opportunities for a driver to sleep which may occur with either a recovery or reset break.
<b>Trip</b>	A return journey of more than 500 kilometres that involves a vehicle moving livestock or raw or manufactured materials from one place to another.
<b>Within work rest</b>	Short rest breaks taken within a work opportunity will delay onset of fatigue impairment.
<b>Work opportunity</b>	Work time plus work related rest or breaks between commencing and finishing work. At least a 7 hour break is necessary to signify the end of a work opportunity.

## Steps to implement an FRMS in your company

The flowchart below outlines the major steps that operators need to progress through to implement, and continue to monitor, a tailored Fatigue Risk Management System (FRMS). The major steps in the implementation of an FRMS are:

1. Company commitment
2. Conduct a fatigue risk assessment
3. Document your FRMS policy, procedures and forms
4. Training key staff and drivers
5. Audit your system
6. Apply for AFM accreditation.

Each step is discussed in more detail later in this document.



Figure 1 - Steps in Implementing an FRMS

A major component of successful implementations that is not represented in this figure is the underlying culture into which an FRMS is introduced. Certainly, commitment from senior management and active and prominent local champions are important in promoting that culture. However, promoting a workplace environment in which fatigue-related risk is managed by all individuals is essential.

## 1 Company commitment

The initial step in the process of implementing an FRMS is to get company commitment to proceed with one or more of the template tasks, determine the governance structure by which the FRMS will be administered and to stipulate the key roles and responsibilities in the FRMS document.

### Common issues implementing an FRMS in your business

Even with a template to base your own system on, the implementation of a FRMS can be a complicated activity for a business to undertake. The most common problems businesses have in successfully implementing an FRMS are:

- Management not being or not being seen to be committed to the FRMS.
- Lack of financial and human resources to implement the FRMS – Often staff implementing the FRMS have to “fit it in” with their regular duties.
- Staff tasked with implementing the FRMS have insufficient authority to be taken seriously.
- The FRMS doesn’t have a clear leader, figurehead or champion with credibility and authority, who the workforce trust and respect, and who management will listen to.
- Staff implementing the FRMS are not directly involved in commercial or rostering decisions, preventing the business from making difficult choices.
- The FRMS is rolled out but the company culture is not ready, resulting in the FRMS not being accepted by staff or used appropriately.
- Providing generic “off-the-shelf” fatigue training that does not consider the specific risks faced by an individual business, is of limited relevance to staff and doesn’t meet the AFM standard.

Each of these issues has the potential to compromise the implementation of the FRMS, making it harder for a business to successfully get AFM accreditation based on the Livestock Transport FMS. Appendix 1 has further information about encouraging a culture in which the shared responsibility of fatigue risk management can be successfully implemented.

### Determining roles and responsibilities

The template *AFM Policy and Procedures* defines the responsibilities of various individuals within typical transport operations. These include the Managing Director/General Manager, the Operations Manager/schedulers, supervisors and individual drivers.

It is important that an organisation tailors the roles and responsibilities section to their own organisational structure. Review the roles and responsibilities below. As you go along, work out who, in your business, will perform these functions. When you have finished, update the AFM template or your existing fatigue management policy with the newly determined responsibilities.

#### Business Owner/Managing Director/General Manager

The Business Owner/Managing Director/General Manager will support the implementation and maintenance of AFM accreditation based on the template FRMS in the company. Their responsibilities are to:

- determine which template tasks the FRMS is to be based upon
- manage barriers preventing extreme and major level risks being managed to as low as reasonably practicable
- prioritise allocation of available resources to reduce high-risk fatigue to as low as reasonably practicable

## Operations Manager/Schedulers

- monitor compliance with the *AFM Policy and Procedures*
- ensure risk control measures are appropriate for ongoing high risk situations
- prioritise allocation/reallocation of human resources to reduce high fatigue risks
- advise Managing Director/General Manager of barriers preventing extreme and major level risks being managed.

## Supervisors

- ensure FRMS meet all requirements of the *AFM Policy and Procedures*
- ensure compliance with FRMS by driving staff under their supervision
- respond appropriately to reports of fatigue-related incidents, errors or behaviours
- ensure training for self and staff under their supervision required by FRMS is completed
- where organisational delegations permit, ensure available resources are allocated in a manner that reduces fatigue-related risk to as low as reasonably practicable
- advise Operations Manager/Schedulers of barriers preventing extreme and major level risks being managed.

## Drivers

- present at work in a fit state to conduct duties safely
- complete all training required by FRMS
- identify, report and respond to actual and potential risks associated with fatigue according to the FRMS
- inform the appropriate individual where adequate sleep has not been obtained
- declare any work hours outside of rostered work at primary place of employment where it would elevate the risk of fatigue above that which would otherwise be expected.

## Key tasks: Corporate structure and commitment

These are the key tasks relating to the establishment of an appropriate corporate structure for your FRMS.

- Determine the scope of FRMS with Managing Director/General Manager, including relevant template tasks.
- Liaise with the Operations Manager on resources and project support.
- Establish top-level management commitment across the company.
- Identify a project officer to customise the *AFM Policy and Procedures* template and Local Champions.

## 2 Conduct a Fatigue Risk Assessment

Each of the template tasks contain pre-determined fatigue risks and an indication of the level of fatigue risk based on an assessment using the Risk Classification System Matrix in the *AFM Policy and Procedures*. The Fatigue Risk Assessment is about validating this in the context of your company and determining any other factors in your business that may create fatigue risks. Typically, the purpose of the Fatigue Risk Assessment is to ask:

- For the preferred template tasks, what is our fatigue-related risk?
- How are we currently managing our fatigue-risk?
- What can we do, that we are currently not doing?

If you already have done a fatigue risk assessment for your business, check that it is still current and any actions/changes to your fatigue risk management system have been made. If it is current and the changes have been made you can proceed to the next step.

Otherwise, at the end of the risk assessment you will need to update your fatigue risk management policy to reflect changes identified by your assessment and incorporate the relevant sections of the AFM template.

### What is our fatigue-related risk?

As fatigue is a risk to be considered for any organisation providing round-the-clock service, the real question is about the degree of risk that is acceptable with relation to fatigue.

In order to determine this, a number of questions need to be initially addressed to determine current fatigue-related risk:

- Where is our fatigue-related risk highest?
- When does it impact?
- Who does it impact?
- How does it impact?

A fatigue risk scan will identify the specific occurrences of fatigue-related risk in the company, a team or an individual. The fatigue risk scan requires a group of people with current knowledge about the working environment. Another individual that could contribute to this process is your OHS officer, who should already have risk management expertise. Specifically, the questions that should be addressed in some detail are:

- When is fatigue-related risk increased for us? When in the roster or the day or the week or the year is risk increased?
- When fatigue-related risk is increased, who is it impacting? Is there a specific group of drivers that are at increased risk due to the nature of their work arrangements/schedules?
- How does the increased risk impact? What tasks are susceptible to fatigue? How does performance change?

Other questions, based on the Defences in Depth framework, might include:

- To inform our assessment, what information do we have about hours of work, actual sleep, time awake, fatigue reports, etc?
- Do we need to collect some more information or data about these factors?
- What is the information telling us?
- What do we need to do differently (eg. work practices)?
- Can we do things differently?
- What prevents/restricts us from changing things and are these reasonable barriers?

## **How are we currently managing our fatigue-related risk?**

Based on the answers that identify the fatigue-related risks, a decision needs to be made about whether or not the identified risks are currently being managed adequately. That is, where fatigue-related risk is elevated, is it an acceptable risk based on everything we know? This requires you to identify all the current controls that are in place.

It should be noted that the fatigue risk scan and subsequent risk register, will form a very strong foundation for your FRMS through the identification of current and potential controls. It is also important to understand that the vast majority of controls that are in place in your company are most likely informal controls. Indeed, these controls are probably not called controls and almost certainly aren't presently referred to as fatigue risk management strategies. You should identify as many of these informal practices as you can and include them in the FRMS Policy for other staff to use where appropriate.

### **Key tasks: Fatigue Risk Assessment**

These are the key tasks relating to the fatigue risk scan.

- Assign roles and responsibilities for conducting and writing up the results of the fatigue risk assessment.
- Choose the most appropriate format for the fatigue risk scan – either individual interviews, focus groups or a written survey.
- Conduct the fatigue risk scan
- Identify the specific fatigue-related risks and develop a fatigue risk register
- Evaluate the current risk mitigation strategies and develop the action-plan for the FRMS.

## 3 Complete a FRMS Policy

Working through the previous sections has enabled you to:

- assess the fatigue-related risk in your workplace
- determine the controls you already have in place, even though they are probably informal (ie. not written down anywhere)
- define the roles and responsibilities for people in your company and to understand the roles of the management in supporting you in managing fatigue-related risk in your drivers
- create and foster an environment that encourages reporting of instances of increased fatigue-related risk
- document the assessment and control strategies for fatigue-related risk that are tailored for your workplace
- determine the best education strategy for drivers and other key personnel.

It is now time to put FRMS documentation for your company together.

### If you already have a fatigue management policy

Many livestock transport operators, especially those that are accreditation in Basic Fatigue Management (BFM) have some form of fatigue management documentation for their business. If this is the case, you don't have to replace your existing system with the model AFM system in the *AFM Policy and Procedures*.

Compare your existing documents with the model AFM documents. Pay specific attention to sections 1, 2 and 10 which cover how you schedule, roster, determine driver fitness and use your operating limits.

If your existing documentation covers the key areas in the model AFM documents (highlighted by blue text in the instructions), you do not have to make any changes. It doesn't matter if you do something slightly different to what is mentioned in the model AFM system – so long as the outcome of the process is the same.

If some of the key areas are missing you can add them to your own documentation by copying them across from the model AFM system.

Make sure you use the latest version of your existing documents, including any changes that may be identified by your risk assessment.

### If you are new to fatigue management

Use the model AFM system in the *AFM Policy and Procedures* as the basis of your Fatigue Risk Management System.

The document is a complete system but will need to be revised to include information for your business. Any text inside square brackets “[text]” will need to be replaced with relevant information for your business. As a minimum, you will need to:

- update the template with your company's information (throughout)
- inserting a new organisational chart
- reviewing the template countermeasures and updating with tailored FRMS defences
- creating template schedules and rosters for your business
- reviewing draft forms and 1) removing potential duplicates and 2) customising other forms for your company

## Key tasks: FRMS Policy

The *AFM Policy and Procedures* contains a template AFM system including a FRMS policy, procedures and forms that also meets the 10 AFM standards. The next step in implementing an FRMS in your company is to update the template FRMS policy with your tailored information.

As a minimum, this should include:

- updating the template with your company's information (throughout)
- inserting a new organisational chart
- reviewing the template countermeasures and updating with tailored FRMS defences
- creating template schedules and rosters for your business
- reviewing draft forms and removing potential duplicates and customising other forms for your company.

Prior to implementation, you should consult with all key stakeholders in your company and allow adequate opportunity for review and feedback on the FRMS document.

## 4 Training

All drivers and staff involved in fatigue management, as part of the implementation of fatigue risk management systems, are required to complete mandatory courses in managing fatigue. The two courses are:

- Apply fatigue management strategies (TLIF2010A) - This unit involves the skills and knowledge required to apply fatigue management strategies, including identifying and acting upon signs of fatigue and implementing appropriate strategies to minimise fatigue during work activities, in accordance with legislative and regulatory requirements. This unit is best suited to drivers and supervisors.
- Administer the implementation of fatigue management strategies (TLIF3063A) - This unit involves the skills and knowledge required to administer the implementation of fatigue management strategies, including monitoring the implementation of fatigue management strategies; and recognising breaches of fatigue management policies, procedures and regulations. It also includes developing and assessing staff competence in fatigue management; providing feedback to staff on any shortcomings in their fatigue management skills and knowledge; and reporting to management on the implementation of fatigue management policy. This unit is best suited to supervisors and managers.

Additional information on these units can be obtained at the following:

<https://training.gov.au/Training/Details/TLIF2010A>

<https://training.gov.au/Training/Details/TLIF3063A>

### Key tasks: Training

These are the key tasks relating to training.

- Identify staff training needs based on their role and responsibilities and prior learning.
- Identify and select a training provider that represents good value to business.
- Arrange for training delivery including arranging for drivers to participate as necessary.



Image provided courtesy of Kevin Williams



Image provided courtesy of Kevin Williams

## 5 Audit your system

To qualify for accreditation you must be audited by an independent NHVAS auditor to verify that your Fatigue Risk Management System (as set out in your *AFM Policy and Procedures*) ensures that you can comply with the 10 AFM Standards. This is called an Entry Audit.

You must also be audited at specified intervals after you qualify so that your accreditation can be renewed. These are called Scheduled Compliance Audits, and they are to check that you are doing what you said you would do. The first Scheduled Compliance Audit will be conducted six months after your accreditation. After that, Scheduled Compliance Audits are required within the last twelve months of your current accreditation period.

Your accreditation lasts for two years unless a Compliance Audit recommends that it be terminated sooner. It is up to you to arrange and pay for these audits. You can get a list of NHVAS auditors from the NHVR website or by calling the NHVR on 1300 MYNHVR (1300 696 487).

### What is an audit?

An audit is simply a check to make sure that your Fatigue Risk Management System works and that you are complying with the Fatigue Management Standards and Heavy Vehicle National Law.

If your records and procedures are all correctly in place, the auditor will recommend that your application be granted.

There are strict guidelines for auditors, but if you have successfully completed your own internal review first, the external audit shouldn't be a problem for you.

The auditor may find some evidence of non-compliance and recommend that you take corrective action. Unless the non-compliance is persistent and serious, it won't necessarily affect your accreditation in the long term; but you will have to demonstrate that you have taken successful corrective action before your accreditation will be granted.

### What to expect in an audit?

After you have engaged a NHVAS auditor to conduct an AFM, the auditor will contact you to schedule an appointment. A date and time will then be agreed upon. The audit should take place where you normally run your business from as this makes access to documents and records easier.

### Preparing for the audit

The auditor may explain the documents and records required for review before the day of the audit. It is a good idea to gather these before your meeting. Typically, the auditor will want to look at:

- Fatigue Risk Management System/Fatigue Management Manual
- Forms mentioned in your System/Manual
- Template trip plans
- Training records for your drivers/key staff
- Medical records for your drivers

Audit's usually cover the period since the last audit but for business's applying for accreditation for the first time, the auditor will look at the documents and records you have prepared for use when you are accredited. The auditor will undertake a Scheduled Compliance Audit roughly six months after you are granted accreditation to ensure that you are keeping the correct records as described in your Fatigue Risk Management System.

## **During the audit**

The auditor may take a tour and or observe your operations to get a better understanding of your business activities and Fatigue Risk Management System.

The auditor will review your records/system documents and may provide you with valuable information and instructions for future use.

To minimise disruption to your business and save time, the auditor may choose to look at a sample of your records. Sampling, also minimises the costs associated with retrieving and examining documents. The auditor will discuss the options to select the most appropriate method of sampling with you.

Although most audits can be completed with the records and documents requested by the auditor before the audit, additional documentation may be requested on the day of the audit to clarify potential issues.

The time to complete an audit varies upon the size of your business and the number of records/documents being reviewed. It is best to set aside the whole day to help the auditor during the audit.

## **Finalizing the audit**

You will be notified on the audit findings by the auditor after the audit day. This gives the auditor time to document their observations and findings.

It is possible, following the audit, that the auditor raises Corrective Action Requests (CAR). CAR's summarise issues where your system does not meet the AFM Standards and provide suggested changes that will allow your system to meet the Standards.

All CAR's need to be closed out before your application for AFM accreditation can be accepted by the NHVR. To close the CAR, you will need to agree which changes will be made, implement those changes and have the CAR signed by both the auditor and the person in your business responsible for your AFM accreditation.

If the Auditor is satisfied that your system and business meet the AFM Standards (and all CAR's have been closed out) they will give you a signed National Heavy Vehicle Accreditation Audit Report. You must keep this report safe and attach a copy of it to your application form.

## **Key tasks: Audit your system**

To have your business audited you must:

- Select an NHVAS auditor and engage them to conduct your AFM audit
- Schedule a day for your audit
- Organize relevant documents
- Close out any CAR's (if required)
- Keep your signed National Heavy Vehicle Accreditation Audit Report for your application.

## 6 Applying for AFM accreditation

After implementing the FRMS in your company, training your staff and passing your audit, the next step is to apply for AFM accreditation so you can use the AFM work and rest limits. The good news is that the Livestock Transport Fatigue Management Scheme and your FRMS constitute the bulk of the paperwork you have to do for your application.

The easiest (and recommended) method of submitting an application for accreditation or reaccreditation is via our website (<https://www.nhvr.gov.au/forms/submission-form>). Our website contains a comprehensive help to assist users in submitting their application for accreditation.

Alternatively, you can download the NHVAS accreditation application form (NHVAS MA1) as a PDF from our website and submit your application in writing. The application form includes instructions on how to complete each section and provides details on the documentary evidence you will need to provide with your application.

### The application form

This section outlines the application form in detail. Before starting your application, please read this and the ‘General Information’ section on page one of the application form.

### Accredited operator details

Accreditation is awarded to businesses – whether they are run by companies, partnerships or individuals. This section collects the information required to legally identify who runs the business seeking accreditation.

If your business is a company, please provide the requested details for the company, including the Australian Company Number (ACN). Note that you cannot use an Australian Business Number (ABN) instead of an ACN. If you don’t know your ACN, it is printed on your companies’ certificate of registration. You can also contact the Australian Securities and Investments Commission to find out your ACN.

If you have NHVAS accreditation for mass, maintenance, or Basic Fatigue Management, you should enter your current NHVAS accreditation number. You’ll find this number printed on the front of your NHVAS certificate.

If you are applying for AFM accreditation as an individual the accreditation should be in your own name and use your business address.

### Choose application type

This section asks applicants to identify the application type. If your business is not NHVAS accredited, please tick ‘Establish accreditation’. If you already have NHVAS accreditation, please tick ‘Add module to accreditation’.

### Contact person’s details

Please provide all information required by this section of the application form, which collects the important information needed to contact you both in relation to your application if necessary and later if you become accredited.

### **Accredited operator declaration**

In this section, you acknowledge that you are applying for accreditation, have completed the application form honestly and you agree to the NHVR's privacy policy. This section must be signed by a company director (if the business is a company) or by the individual applying for accreditation. Prior to signing the completed form, please read it carefully.

### **NHVAS Accreditation Module selection**

Please tick 'Advanced Fatigue Management (AFM)'.

### **Compliance History Declaration**

This section collects information on relevant compliance issues that the NHVR will need to consider before granting accreditation.

Please provide details of contraventions of the HVNL or previous corresponding laws for the applicant and other parties involved in the running of your AFM accreditation. You do not have to provide details of offences by drivers unless they have another role in your AFM accreditation (e.g., training manager/scheduler).

Past contraventions do not automatically disqualify you from being AFM accredited. Be as honest as possible in this section as it is an offence to provide false or misleading information.

If there are no contraventions to declare, write NIL in the table to indicate this.

### **Vehicle particulars**

You do not have to complete this section.

### **Change of existing vehicle particulars**

You do not have to complete this section.

### **Drivers under Fatigue Management**

You do not need to have all of your drivers trained prior to applying for AFM accreditation. Provide the name and other details of drivers that you plan to have work under your AFM accreditation.

If you have not completed the induction of your nominated drivers into your FRMS prior to applying for AFM accreditation, leave this column blank. However, you will need up-to-date records of drivers within the first six months of your AFM accreditation.

### **Payment details**

There is a nominal accreditation application fee for AFM accreditation which covers the cost of the NHVR administrative effort. There is no per vehicle/per driver fee for AFM accreditation. If you are submitting your application using the online portal, our system will take you through the payment process. Otherwise, please complete all the payment details fields to authorise payment.

## **Lodging your application**

You can submit completed applications and supporting information online or by mail, fax or email as listed below:

Online [www.nhvr.gov.au/forms/submission-form](http://www.nhvr.gov.au/forms/submission-form)

Mail Accreditation

National Heavy Vehicle Regulator

PO Box 492

Fortitude Valley QLD 4006

Fax 1300 736 798

Email [forms@nhvr.gov.au](mailto:forms@nhvr.gov.au)

*Please review your application before lodging it.* You should also check that you have included all supporting documentation along with your completed application form. This will ensure that your application is both complete and accurate so that it can be processed as quickly as possible.

Should you need assistance to complete any part of your application, please contact the NHVR Accreditation Team by calling 1300 MYNHVR (1300 696 487). Standard 1300 call charges apply so please check with your phone service provider.

## **Key tasks: AFM Accreditation Application**

To apply for AFM accreditation you must submit the following documents to the NHVR:

- Signed Establish Accreditation form
- Signed Independent National Heavy Vehicle Accreditation Audit Report
- Compliance History Declaration* form for the operator and all associates
- Nominated drivers list (can be in any format)
- AFM Policy and Procedures* (including proposed template tasks).

As a pre-approved template, you will not be required to provide a detailed safety case with your application.

For more information on applying for accreditation, including how to apply using the NHVR's online application process, please call us on 1300 MY NHVR (1300 696 487).

# Appendix 1 – Development of a change management plan

## Building recognition of need to change

It is necessary to develop a need for change within the company and each employee. Previous experience has shown that a lack of a sense of urgency and the absence of a specific catalyst for change makes it difficult to implement change. In some cases, fatigue is not seen as a critical issue for performance or safety by some staff at all levels, and a sense of not being vulnerable is apparent. Excessively long working hours had become a cultural norm because of deeply entrenched historic practices within the heavy vehicle transport profession.

Actions that establish the need for change must focus on disrupting complacency and could include:

- publicising critical events where fatigue has been a contributing factor
- continued education about the impacts of fatigue on performance
- a consistent message from the organisation, colleges and associations that there is a need for change.

## Delineating accountability and responsibility

The responsibility for employee and public safety needs to be formally defined and accountability for a safe system of work established within the company. Previous experience indicates that there is often referral of responsibility to ‘the system’, ‘the fatigue policy’ or ‘the organisation’ and evidence of learned helplessness within individuals in the company.

Actions that establish accountability and responsibility for managing fatigue-related risk could include:

- clear delineation of accountability and responsibility for fatigue risk management
- organisational requirement for managers, supervisor and schedulers to report formally on fatigue risk management in their teams.

## Identifying industrial impediments to change

In several road transport businesses there is a clear link between the number of hours worked and the remuneration received by the drivers. In some cases, remuneration structures reward excessively long hours of work and there is anecdotal evidence of overtime payments reinforcing work practices that elevate fatigue risk.

Whilst the emphasis of fatigue as a safety issue is critical, the company’s current industrial context needs to be critically examined as part of the overall change management process.

## Provision of resources for change – Allocating time for change

Within individual teams, the management of fatigue risk requires a small but significant investment in time. In already stretched teams, finding even 30 minutes for meetings relating to FRMS development can be extremely difficult, let alone time for a half-day workshop to develop and embed components of the FRMS into work practices.

Actions that assist in the provision of resources for change could include:

- clear communication of the requirement to invest time in the development of fatigue risk management systems
- provision of locum resources to cover the time required to develop FRMS within each unit.

## **Investing in change agents – local champions**

In other industries, the experience to date has highlighted that success is closely linked to the strength of local champions. These are drivers who are peers and who can dedicate time and effort to working with other drivers in the development of FRMS.

Actions that assist in the development of these local champions could include:

- ensuring each team has a local champion for fatigue risk management
- analysing the training needs of local champions
- facilitating a local champion forum or get together
- providing support to cover the driving load of local champions.

## Implementation Checklist

1	Read template documentation thoroughly	<input type="checkbox"/>
2	<p>Get Executive/Management approval for financial and time resources</p> <p>The implementation of fatigue accreditation requires a small but significant investment in time and some financial resources to obtain necessary training for key staff and to have systems audited.</p> <p>Approval for this investment should come from the most senior levels within the company, to maximise staff buy-in.</p>	<input type="checkbox"/>
3	<p>Appoint someone to lead the implementation of the template</p> <p>Research shows that to avoid staff from shifting responsibility for fatigue accreditation to ‘the system’ or ‘the organisation’ a person must be appointed to implement the livestock template.</p>	<input type="checkbox"/>
4	<p>Assess the current fatigue risk management system</p> <p>Some of the systems included in the template fatigue risk management system may already be in place in the business. If so, it may be possible to use existing practices by deleting the relevant section of the template system and inserting the business policy and procedure. Only do this if your current practices meet the AFM standards.</p>	<input type="checkbox"/>
5	Assess current fatigue risks and controls	<input type="checkbox"/>
6	Update the template fatigue safety management systems with your company details	<input type="checkbox"/>
7	<p>Implement changes to business practices to incorporate any additional controls</p> <p>This includes:</p> <ul style="list-style-type: none"> <li>• Customising forms</li> <li>• Setting up file locations for forms (folders/filing cabinet files)</li> <li>• Printing blank forms for drivers/schedulers</li> <li>• Laminating a blank form for future photocopying</li> </ul>	<input type="checkbox"/>
8	Arrange for drivers and key staff to be trained in the fatigue risk management staff and relevant fatigue competencies	<input type="checkbox"/>
9	Arrange for an audit of the company’s fatigue safety management system	<input type="checkbox"/>
10	Prepare and submit application documentation	<input type="checkbox"/>
11	Induct drivers and key staff into FRMS	<input type="checkbox"/>

## Acknowledgements

The NHVR would like to acknowledge the following persons and agencies for their contributions to this document.

- Members of the Australian Livestock and Rural Transport Association and Livestock Rural Transport Association of Queensland
- Ian Pendred
- Darby Sullivan
- Mick McCulloch
- Queensland Department of Health
- Queensland Department of Transport and Main Roads
- Western Australian Department of Commerce





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201507-0209