



TRAFFIC IQ LIMITED

FATIGUE MANAGEMENT & WORKING TIME POLICY

Version: V1

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Last updated: 01/04/2026

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1. Purpose

Traffic IQ Limited ("Traffic IQ", "we", "us" or "our") recognises that fatigue is a health and safety risk for individuals working on its behalf. As a traffic management labour supplier, Traffic IQ will manage fatigue risks so far as is reasonably practicable and will work with clients and principal contractors to support safe working arrangements.

This policy explains what fatigue is, the legal limits on working time that apply, and the responsibilities of Traffic IQ and of the individuals it supplies.

2. Scope

This policy applies to all operatives and workers supplied by Traffic IQ, regardless of assignment length, and to Traffic IQ's own staff involved in planning or managing assignments.

3. Legal and regulatory framework

Traffic IQ will manage fatigue risk in accordance with:

- the Working Time Regulations 1998 (WTR);
- the Health and Safety at Work etc. Act 1974, including the general duty to ensure, so far as is reasonably practicable, the health and safety of workers;
- the Agency Workers Regulations 2010, where applicable; and
- relevant guidance issued by the Health and Safety Executive (HSE) on fatigue and shift work risk management.

4. What is fatigue

Fatigue needs to be managed like any other hazard. Fatigue refers to the issues that arise from excessive working time or poorly designed shift patterns. It is generally considered to be a state of weariness which impacts mental and/or physical performance. It results from prolonged exertion, sleep loss and/or disruption of the internal clock. It is also related to workload, in that workers may become more easily fatigued if their work is machine-paced, complex or monotonous.

Fatigue results in slower reactions, reduced ability to process information, memory lapses, absent-mindedness, decreased awareness, lack of attention, underestimation of risk, reduced coordination, and other symptoms. Fatigue can lead to accidents and mistakes, injury and ill-health, and reduced productivity. It is often a root cause of major accidents.

5. Fatigue risk assessment and controls

Traffic IQ will assess fatigue risks associated with working hours, shift patterns, night work, overtime, travel requirements, consecutive shifts and other relevant working arrangements.

Where Traffic IQ does not control the full working pattern, it will work with the relevant client or principal contractor to identify and manage fatigue risks.

Fatigue risk assessments and controls will be reviewed periodically and when there is a significant change to working arrangements, following a fatigue-related incident or near miss, or where monitoring identifies a recurring risk.

Controls may include appropriate shift scheduling, limits on consecutive shifts, adequate rest periods, additional breaks, changes to duties, escalation to the client or principal contractor, and removal from safety-critical work where necessary.

6. Working time and rest requirements

The table below summarises the main Working Time Regulations 1998 limits relevant to fatigue management. It is a summary only and does not replace the applicable legislation.

Limit	Requirement under the Working Time Regulations 1998
Maximum weekly working time	An average of 48 hours per week (averaged over 17 weeks), unless the individual has signed a valid opt-out.
Daily rest	At least 11 consecutive hours' rest in each 24-hour period.
Weekly rest	At least 24 hours' uninterrupted rest in each 7-day period (or 48 hours in each 14-day period).
Rest breaks	An uninterrupted 20-minute rest break during the working day where the worker works more than 6 hours.
Night work	An average of no more than 8 hours' work in each 24-hour period for night workers; free health assessments must be offered before starting night work and periodically thereafter. Where night work involves special hazards or heavy physical or mental strain, the 8-hour limit applies absolutely, not just as an average.

These requirements are a summary of the general Working Time Regulations 1998 provisions. Different or additional requirements may apply to certain categories of workers, including drivers and mobile workers, young workers, night workers, and workers covered by other specific sectoral rules. In particular, operatives who drive vehicles over 3.5 tonnes (or other vehicles subject to tachograph rules) may fall under the separate EU/GB drivers' hours rules and the Road Transport (Working Time) Regulations 2005, rather than — or in addition to — the WTR 1998 limits above; some road maintenance and traffic management vehicles may also qualify for a specific exemption from drivers' hours rules. Traffic IQ will confirm, vehicle by vehicle and role by role, which regime applies, and will identify and apply the requirements relevant to the individual assignment.

Traffic IQ confirms that operatives currently only drive vehicles under 3.5 tonnes; the EU/GB drivers' hours rules and Road Transport (Working Time) Regulations 2005 do not currently apply.

No individuals have currently signed a working time opt-out.

7. Traffic IQ's responsibilities

Traffic IQ will:

- before placing an operative, obtain a declaration of availability and fitness for work, and consider known information about recent hours worked, travel, night work, consecutive shifts and other known working commitments that may reasonably affect fatigue risk;
- not knowingly supply an operative where there is a reasonable concern that fatigue could affect their safety or the safety of others;
- work with clients and principal contractors to understand the assignment, shift pattern, site rules, rest arrangements and any fatigue-related controls set out in the client's RAMS;
- provide information and instruction on fatigue risks, including the importance of adequate sleep, rest, hydration, breaks and reporting concerns promptly;
- maintain a process for operatives to report fatigue or concerns about unsafe hours without being expected to continue work where it would be unsafe to do so;
- record and review fatigue concerns, near misses, incidents, repeat no-shows or unsafe working patterns, and take additional action where appropriate;

- escalate relevant concerns to the client or principal contractor where necessary to protect health and safety, while handling personal medical information confidentially; and
- meet its responsibilities under the Working Time Regulations and Agency Workers Regulations where these apply and not rely on legal minimums alone to manage fatigue risk.

This declaration is currently obtained informally, e.g. via a quick check before confirming the assignment.

8. Operative responsibilities

Operatives must:

- only accept and attend assignments when fit for work, adequately rested and able to perform the role safely;
- tell Traffic IQ as soon as possible if fatigue, lack of sleep, illness, medication, alcohol, drugs, long travel, another job or any other factor may affect safe performance;
- if a fatigue concern arises after arriving on site, report it immediately to the Traffic IQ contact and the client or principal contractor's site supervisor;
- provide accurate information about availability and recent working hours where requested, including work carried out for other organisations where this may affect fatigue risk;
- comply with the client's site-specific RAMS, induction, break arrangements, safety rules and all reasonable instructions relating to fatigue management; and
- not drive or undertake safety-critical work if fatigue, medication or a medical condition makes it unsafe, and comply with any applicable legal requirements concerning fitness to drive and notification to the DVLA.

9. Site-specific arrangements

Working hours, shift patterns and rest arrangements on a specific assignment are also governed by the client's or principal contractor's site rules and RAMS. Where a conflict arises between this policy and site-specific requirements, the more protective requirement will normally apply, and Traffic IQ must be notified.

10. Reporting fatigue concerns

Operatives can and should report fatigue concerns without fear of losing future work for having done so. Traffic IQ will treat a genuine fatigue-related report as a safety matter, not a performance or reliability issue, and will not penalise an individual for reporting a concern in good faith.

11. Records and monitoring

Traffic IQ will maintain records of fatigue declarations, reported concerns, near misses and any related incidents, and, where applicable, records of working hours, rest periods and working time opt-outs. These records will be reviewed periodically to identify patterns (for example, particular clients, shift patterns, or times of year) that may indicate a systemic fatigue risk requiring further action.

12. Training and awareness

Traffic IQ will ensure operatives receive information on fatigue risks and reporting routes as part of onboarding, and will remind operatives of this policy where a specific assignment carries a higher fatigue risk (for example, night work, long shifts, or extended travel).

13. Responsibilities

Dillon Turay is accountable for overall compliance with this policy.

- Anyone involved in booking or placing operatives must apply the fitness-for-work checks in Section 7.
- Concerns about a pattern of fatigue-related incidents must be escalated promptly.

14. Policy governance and review

This policy will be reviewed at least annually and sooner where there is a material change to legislation, HSE guidance, or where monitoring identifies a recurring fatigue-related risk.

15. Related documents and records

- Agency Worker Policy
- Drug and Alcohol Policy
- Fatigue declaration / fitness-for-work records
- Fatigue and near-miss incident log