

23 May 2025

Ms Ella Haddad MP  
Chair  
Standing Committee on Government Administration B

Email: [assemblygab@parliament.tas.gov.au](mailto:assemblygab@parliament.tas.gov.au)

Dear Ms Haddad

**RE: Request for draft fatigue management policy and Guidance Note**

I refer to your letter dated 12 May 2025 requesting a copy of Tasracing's draft fatigue management policy.

Please find attached a copy of the draft Tasracing Fatigue Management Guidelines.

A copy of the guidelines has been provided to the Tasmanian Racing Integrity Commissioner for review.

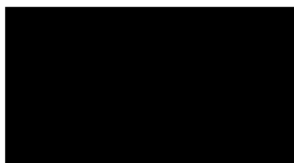
It is Tasracing's intention to release the guidelines on 1 July 2025 pending the below consultation and approval process.

Tasracing will undertake extensive stakeholder engagement with the fatigue guidelines including:

- The guidelines will be provided to the three industry group meetings in June.
- The guidelines will be provided to Racing Integrity Committee for feedback and approval in accordance with the *Racing Regulation and Integrity Act 2024*
- The guidelines will then be presented to the Racing Rules and Policy sub-committee for approval and subsequently the Tasracing Board at the June meeting.
- Once approved a media release will be issued by Tasracing's CEO and communication sent to all trainers and participants via SMS as well as social media posts.

- The approved guidelines will be included in the next industry racing calendars due for release mid-July.

Yours sincerely



David Manshanden  
Acting Chief Executive Officer

# *Tasracing*

## *Fatigue Management Guidance*

*May 2025*



*Tasracing*

*Shaping a united  
and vibrant industry  
of which Tasmania  
can be proud.*

*[tasracing.com.au](https://tasracing.com.au)*

# 1. PURPOSE AND SCOPE

Tasracing is committed to promoting a safe and healthy workplace for its employees and all participants in the racing industry. This requires collaborative efforts to manage and minimize the risks associated with fatigue.

This Guidance Note aims to support trainers and industry participants by outlining workplace health and safety (WHS) and employment obligations relating to fatigue. It seeks to enhance understanding of fatigue risk management and provides a framework for addressing these risks effectively.

Participants in the Tasmanian racing industry face significant fatigue risks due to demanding schedules, extensive travel, and, for some, the pressures of weight management and other employment outside of the racing industry. These factors can impact health and safety, creating risks under Tasmania's WHS legislation.

Fatigue impairs alertness, slows reaction times, and reduces decision-making abilities, all of which increase the likelihood of accidents travelling to and from events, and injuries during racing and training activities.

To address these risks, the Guidance Note encourages trainers and their employees to collaborate in developing a 'weekly plan' that accounts for work schedules and working hours. This plan should prioritize minimizing fatigue risks wherever practicable.

While Tasracing does not directly manage fatigue risk for industry participants, it is committed to supporting the racing industry by providing resources and guidance to promote safe practices.

## 2. WHAT IS FATIGUE?

Safe Work Australia defines fatigue as more than feeling tired and drowsy. In a work context, fatigue is a state of mental and/or physical exhaustion that reduces a person's ability to perform work safely and effectively.

It can occur because of prolonged or intense mental or physical activity, sleep loss and/or disruption of the internal body clock.

### Signs of fatigue include:

- tiredness even after sleep
- reduced hand-eye coordination or slow reflexes
- short term memory problems and an inability to concentrate
- blurred vision or impaired visual perception
- a need for extended sleep during days off work.

### Causes of fatigue

Fatigue can be caused by work related or non-work related factors or a combination of both.

Work related causes of fatigue include excessively long shifts, not enough time to recover between shifts and blocks of shifts, very strenuous jobs and long commuting times. An example of non-work related fatigue would be poor quality sleep due to street noise or family demands.

### Work causes of fatigue might include:

- roster patterns
- lengths of shifts, or insufficient recovery time between shifts
- harsh environmental conditions; and
- prolonged or intense mental or physical activity.

## The body clock

Most people are day-orientated meaning they are most alert and productive in the daytime and sleep at night. The circadian rhythms (the body clock) cause regular variations in individual body and mental functions repeated approximately every 24 hours. These rhythms regulate sleeping patterns, body temperature, heart rate, hormone levels, digestion and many other functions.

These rhythms influence job performance and quality of sleep. Most of the body's basic functions show maximum activity by day and minimum activity by night. The body rhythms affect the behaviour, alertness, reaction times and mental capacity of people to varying degrees.

## Why is fatigue a problem in the workplace?

Fatigue may increase the risk of incidents because of a lack of alertness. Fatigue may result in a slower reaction to signals or situations and affect the ability to make good decisions, particularly when:

- operating fixed or mobile plant including driving vehicles
- undertaking critical tasks that require a high level of concentration
- undertaking night or shift work when a person would ordinarily be sleeping.

A person conducting a business or undertaking must ensure, so far as is reasonably practicable, the health and safety of workers while they are at work. This means if fatigue is identified as causing a risk to work health and safety, then suitable control measures should be implemented in consultation with workers to eliminate or minimise the risks.

### 3. LEGAL OBLIGATIONS UNDER WHS LAWS

Under Tasmania's Work Health and Safety Act 2012, both employers and workers have legal obligations to manage fatigue-related risks.

Under the Work Health and Safety Act 2012 (TAS) (the WHS Act), as a person conducting a business or undertaking (a PCBU), i.e. a Trainer, a PCBU must eliminate risks in the workplace, or if that is not reasonably practicable, minimise the risks so far as is reasonably practicable.

#### **Employers (PCBU - Person Conducting a Business or Undertaking):**

- Provide and maintain a safe working environment.
- Identify and manage risks associated with fatigue.
- Offer appropriate training and information to workers.

#### **Workers:**

**At the same time, a worker has a duty while at work to:**

- take reasonable care for their own health and safety
- ensure their actions do not harm others
- follow reasonable instructions and cooperate with workplace policies regarding fatigue management.

**Under the WHS Act, a 'worker' is a person who carries out work in any capacity for a PCBU, including, but not limited to:**

- an employee
- a contractor or subcontractor
- an employee of a contractor or subcontractor
- an apprentice or trainee
- a student gaining work experience; or
- a volunteer.

## 4. GUIDANCE FOR TRAINERS AND WORKERS

Workers often have demanding schedules, which can lead to fatigue. Trainers and workers are encouraged to:

- Develop a 'weekly plan' to schedule work hours i.e ten hours between shifts as per documented for Tasracing employees and Apprentice jockeys
- Ensure the plan aligns with WHS obligations and provides sufficient rest periods.
- Review the plan regularly to account for changes in schedules or workloads.

The 'weekly plan' should aim to balance commitments while prioritizing rest and recovery to maintain safety and performance standards.

## 5. FATIGUE RISK MANAGEMENT STRATEGIES

Effective fatigue management involves identifying risks, assessing their impact, and implementing strategies to minimize them. Some recommended strategies include:

- **Work Scheduling:** Limit long working hours and ensure adequate breaks between shifts. Avoid where possible scheduling tasks during high-risk times, such as late at night or early in the morning.
- **Travel Management:** Plan travel to allow sufficient time for rest and recovery before and after events. Consider sharing the driving with other race day participants in the car.
- **Weight Management Practices:** Provide education on healthy weight management strategies and support for participants managing weight-related pressures for Jockey's and apprentices.
- **Awareness and Training:** Offer training on recognizing fatigue and implementing risk management practices.

**Communication:** Foster open communication among all participants to address fatigue concerns promptly.



## 6. TASRACING'S SUPPORT

While Tasracing does not directly manage fatigue for individual participants, it is committed to supporting the industry by:

- Providing resources and guidance on fatigue risk management.
- Promoting awareness of WHS obligations and best practices including training.
- Facilitating collaboration between trainers, apprentice jockeys, and other industry participants to prioritize safety and well-being.

## 7. CONCLUSION

Fatigue management is a shared responsibility that requires commitment from all industry participants. By working together to recognize and mitigate fatigue risks, the Tasmanian racing industry can maintain a safe, healthy, and sustainable environment for everyone involved.

Tasracing encourages all trainers and participants to utilise the strategies outlined in this Guidance Note and to seek additional support or clarification as needed.

**Further information:**

- Worksafe Tasmania – 'What is Fatigue'
- Safe Work Australia – "Guide for Managing the Risk of Fatigue at Work"