WORKSHEET 3.8

Auditing Fatigue, Workload and Psychological Health

Subchapter 3.8 · case in the book: Phuket

GUIDING QUESTION

Your hazard register almost certainly contains one line on workload, rated low, written by the person who builds the roster. Which internal audit has ever asked to see the timesheets that would test it?

This worksheet turns the tools of the subchapter into a form you can fill in. The texts come from the book; the empty columns are for your own property. Adapt it before use: an unadapted checklist is exactly what the book warns against.

Practical application: what to do in your property

Step (from the book)	Done?	What we found / owner
Request four datasets for the last peak: turnaround intervals, consecutive days by coded person, short-notice absence by weekday, mid-season leavers.		
If the request is refused, write that finding first. A named hazard that cannot be assessed is a system failure; data protection decides how the data is provided (aggregated or pseudonymised), not whether the hazard is assessed.		
Read the roster data against the injury log, the breakage records and the resignations. State that a pattern exists; do not claim causation.		
Interview about the task, never about the state. Time, sequence, what they check twice, what they would move.		
Ask who rated the entry and on what evidence. The conflict is structural and is worth recording as such.		
Name the period in the request: the last peak, not the last quarter. A quiet quarter shows nothing and will be sent by default.		
Look for a third-rung control. If the only control is training or awareness, the rung above it was never opened.		

These steps are the book's method, not requirements of ISO 45001. Evidence can take whatever form suits the property; a separate document is needed only where an applicable requirement, or the property's own system, makes it necessary.

Verification Pact: what is believed, tested against the standard

What is commonly believed	What actually holds	Our position
«Fatigue and workload belong to human resources.»	Workload and work hours are named inside the hazard identification requirement. Where the data is held does not determine whose hazard it is.	
«There is nothing to audit: you cannot see fatigue.»	You cannot observe it. The property records it to the minute, in systems built for payroll, and those are an audit trail.	
«We asked and everybody said they were coping.»	In a seasonal operation the answer to that question is shaped by whether the person expects to be asked back. It is a response to a different question.	

What is commonly believed	What actually holds	Our position
«The register rates workload as low.»	Rated by whom, on what evidence. Often it is rated by the person whose rostering produces it, from judgement.	
«We run resilience training, so the hazard is controlled.»	Training is a fourth-rung control. Reorganising the roster sits a rung above it in the standard's own ordering.	
«An auditor is not qualified to examine this.»	Correct as to health, and irrelevant. The audit examines identification, assessment, control selection and monitoring: all of them processes.	

Common mistakes: a self-check

Mistake (from the book)	Present here?	Action / owner
Concluding that nothing was found because nothing was seen. There is nothing to see; there is a great deal to read.		
Accepting that the data belongs to another department. A named hazard that cannot be assessed is a finding about the system, not a limitation of the audit.		
Asking people how they feel. The answer is about the season, the audience and next year's contract.		
Leaving the entry rated by the person whose rostering generates the hazard. The conflict is rarely so direct anywhere else in the register.		
Treating training or a support line as the control. Both are below the rung where the answer lives.		
Responding to a process finding by measuring the workers. It collapses reporting and examines the wrong object.		

Operative synthesis

- **This is the hazard that defeats the ordinary audit method, and it defeats it technically rather than morally.** There is nothing to observe: fatigue produces no wedged door and no damaged guard, and the people carrying it look exactly like people at the end of a shift. An auditor who walks and looks will report, accurately, that nothing was found.
- The evidence nevertheless exists, recorded to the minute, in systems built for payroll and rostering by departments that have never been asked a safety question. The audit therefore becomes documentary (in the wrong documents) and comparative: a list of short turnarounds is a rostering fact until it is set beside the injury log and the mid-season leavers, at which point it is a finding about a pattern nobody has examined.
- **The interview changes too.** Asked how they feel, people answer about the season and about next year's contract. Asked about the task (how long the last hour takes, what they check twice, what they would move) they answer about the work, and the answers are specific.
- **And the controls sit a rung higher than the industry reaches.** Reorganisation of work is above training in the standard's own ordering, and for this hazard reorganisation of work means the roster, which the property writes every week and has never treated as a safety control.
- One further note on what the finding may say, because this is the subject on which an internal auditor is most easily drawn beyond the evidence. A pattern in rosters set beside a pattern in injuries establishes that the two coincide. It does not establish that one produced the other, and an audit that writes causation has made a claim it cannot support and handed the department an

easy way to dismiss the whole finding. The defensible sentence is narrower and entirely sufficient: these patterns exist in the property's own records, they concern a hazard the standard names, and nobody has examined them.

- Forty-one short turnarounds in a quarter, concentrated on seven people, who also appear disproportionately in the injury log and account for four of six mid-season resignations. One line in the register, rated low, written four years earlier by the manager who builds the roster, and a refusal to release the data that would have tested it.
- None of which the auditor could have found by walking the building, which raises the question the next subchapter has to settle: what an audit is entitled to treat as evidence, and what it may do with what it was told.

Action plan for our property

Action	Owner	Due	How we will know it worked

Source: Francesco Dore, The Helm and the Lens, Volume 3b «The Lens», subchapter 3.8. Edizioni Effedore, 2026. Clause references are paraphrased; this sheet does not reproduce the text of ISO 45001. It is not legal advice: health and safety law is that of the place where the property operates.