Guidelines for Using Napping to Prevent Commercial Vehicle Driver Fatigue

Prepared by VicRoads
Foreword

The National Transport Commission (NTC) is a body established under an intergovernmental agreement with a charter to develop, monitor, and maintain uniform or nationally consistent regulatory and operational reforms relating to road transport, rail transport, and inter-modal transport. The NTC is funded jointly by the Australian Government, States and Territories.

Fatigue is one of the main causes of crashes involving heavy vehicle drivers. Napping has been identified as an effective tool to help drivers manage fatigue in the short term and maintain alertness.

VicRoads, as lead agency for this project, engaged the Institute for Research in Safety and Transport, Murdoch University and Krueger Economics Consultants to undertake research in this area. The report ‘A Napping Policy to Prevent Commercial Truck Driver Fatigue’ includes a review of research on napping and a suggested napping policy. Comments provided by internationally recognised fatigue experts indicated general support for the use of napping as a fatigue management tool in the transport industry. Based on the findings of the draft report, a set of guidelines ‘Guidelines for using Napping to Prevent Commercial Vehicle Driver Fatigue’, an information bulletin, and a DVD ‘Lightening Your Load – Napping to Manage Fatigue’ have been developed.

This information kit is directed at the road transport industry both transport operators and drivers to assist in developing and implementing strategies for using napping to help manage driver fatigue.

The Commission acknowledges the contribution made by VicRoads to the development of this information kit and the work of Christine Roche from the NTC.

Michael Deegan
Acting Chairman
GUIDELINES FOR USING NAPPING TO PREVENT COMMERCIAL VEHICLE DRIVER FATIGUE
Summary

Fatigue is one of the main causes of crashes involving heavy vehicle drivers. Napping has been identified as an effective tool to help drivers manage fatigue in the short term and maintain alertness. Napping is not intended to be used as a substitute for good scheduling of main sleep. These guidelines are provided to help drivers better understand fatigue and explain how to make the best use of napping to maintain alertness on the road.

The guidelines aimed at road transport operators, and the shorter information bulletin aimed at drivers, explain the causes of fatigue; the body’s need to slow down at certain points in the 24 hour cycle; how and when napping can be used to reduce fatigue; the different types of naps; how to plan for naps; and how employers can assist.

Company policies should also provide opportunities for drivers to obtain on the road maintenance naps by incorporating adequate time for naps into trip schedules. Policies should also encourage drivers to take a preventative nap prior to any long trip. Employers can and should provide information and training on napping techniques to employees on an ongoing basis. The requirement for such policies will form part of the general duty under the new heavy vehicle driver fatigue regulations.

These guidelines are being made available as part of the package on Heavy Vehicle Driver Fatigue to further raise industry awareness of fatigue and as a valuable resource to industry.

Both the Napping Guidelines and the Napping Information Bulletin will be distributed to road transport agencies as content only. State and Territory road transport agencies will then make this content available in suitable formats (hardcopy, electronic, audio and visual) for widespread distribution to the road transport industry as part of the rollout of the Heavy Vehicle Driver Fatigue reform. The cost of publication will be borne by agencies. A Napping DVD is also available.
**Contents**

1. **Introduction** 1
2. **Causes Of Fatigue** 2
   2.1 Our bodies and their need for sleep 2
   2.2 Our biological clock 2
   2.3 Driver Health and Sleep Disorders 2
   2.4 Signs that a Driver is Fatigued 2
3. **Napping Guidelines** 3
   3.1 When to take a nap 3
   3.2 How long should the nap last? 4
   3.3 Beware of grogginess on waking 5
   3.4 What about drinking coffee? 5
   3.5 Napping preparation 6
4. **Company Policy Issues** 7
   4.1 Employers have a duty of care 7
   4.2 Company napping policy and duty of care 7
5. **A Napping Checklist** 9
6. **Common Terms Used In These Guidelines** 11
Key Points

• Naps aimed at preventing fatigue developing (taken before a period of work when fatigue may occur) are generally more effective in maintaining a drivers’ performance than naps taken when a person is already fatigued.

• Naps are best taken in the afternoon.

• Naps should last at least 10 minutes long in most cases, a nap should last up to 45 minutes.

• A driver should allow at least 15 minutes after waking up to fully recover alertness before starting to drive.

• Napping is a temporary fatigue management tool. Naps should not be used as an alternative to major continuous rest breaks.

• Both employers and drivers have a duty of care to control and manage fatigue, and when drivers take naps to manage fatigue they are acting within their duty of care.

• A driver health program should include a napping policy and should provide information and training to employees and their families on how to get the greatest benefit from quality sleep breaks and naps.
1. Introduction

Why use napping?

Fatigue is one of the main causes of accidents among Heavy Vehicle Drivers.

Research shows that fatigued people perform driving tasks as if they had been drinking alcohol.

- After 17 continuous hours awake, including time awake before driving, drivers perform as if they had a Blood Alcohol Concentration (BAC) of 0.05 – the legal limit in Australia.
- After 24 hours awake, a driver’s performance will be on a par with that of a person with a BAC of 0.10 - twice the legal limit.
- Drivers awake for a period equal to or in excess of 17 hours per 24 hour period put themselves and other road users at significant risk.

Driver fatigue results in a steady deterioration in a driver’s performance. The risk of an accident increases as a driver becomes more impaired. Fatigued drivers experience slowed reaction times, reduced attention, memory lapses, lack of awareness, mood changes and a lack of judgement.

If a driver becomes drowsy some can drift into what is known as a ‘micro-sleep’, which is a brief nap that can last from as short as three to five seconds, or as long as ten to fifteen seconds. At 100 km per hour that can mean 100 metres to 300 metres of travel and plenty of time to run off the road into a tree or far worse.

Fatigue is caused mainly by:

- not getting enough quality sleep each day (most people require 7-8 hours sleep per day);
- driving at a time when most would normally be asleep;
- other factors such as work load, health, exercise and stress; and
- excessive journey times within tight timeframes.

Managing these causes is a responsibility shared by both drivers and their employers. Effective fatigue management relies on good scheduling and planning. However, napping has been identified as a way of helping drivers to manage fatigue in the short term. Napping is a temporary fatigue management measure to help drivers maintain alertness. It should not be used as a substitute for good scheduling of main sleep.

The following information is provided to help a driver better understand fatigue and how to make the best use of napping to fight fatigue.
2. Causes Of Fatigue

2.1 Our bodies and their need for sleep
Most people normally need between 7 and 8 hours of continuous sleep to perform at their best. If the quality of a night’s sleep is poor or only a small or a reduced amount of sleep is had over several days, severe sleep debt can result along with an irresistible urge to sleep. This increases the probability of falling asleep at the wheel and crashing.

Work can make you tired
Working in the transport industry can be demanding. Common work practices for many drivers include working long hours, prolonged night work, working irregular hours, little or poor sleep and early starting times or late finishes. A working week of over 70 hours is standard for many drivers. These long hours of work can result in less than adequate sleep and a tendency towards ongoing fatigue. This situation is not acceptable to the wider public and is not in the interest of the transport industry itself.

2.2 Our biological clock
As well as sleepiness being caused by sleep debt, everyone has a biological clock that influences how alert or sleepy we are at certain times of the day. As humans, we are designed to be awake in the daytime and asleep at night (circadian rhythm). We also naturally experience sleepiness during the mid-afternoon “siesta hours”. Our body temperature drops to its daily low point at these times of the day (midnight to 6 a.m. and 2 p.m. to 4 p.m.) as our body naturally slows down to sleep. The risk of being involved in a crash increases when driving during these natural ‘lulls’ when the body has a natural tendency towards sleep.

With inadequate sleep the sleepiness experienced during these natural ‘lulls’ can be a lot stronger and can have an even greater negative effect on a driver’s performance and alertness.

2.3 Driver health and sleep disorders
Poor health and inactivity can make us feel tired and fatigued. Health issues may include diet, obesity, fitness and alcohol and other drugs.

Sleep disorders such as sleep apnoea, which seems to be relatively common amongst truck drivers, cause poor sleep and result in fatigue. Symptoms of sleep apnoea include heavy snoring broken by sudden periods of silence, restless sleep and constantly being tired during the day. Drivers who think they may be suffering from sleep apnoea or any other sleep disorder may be a risk to themselves and to other road users. Drivers must see a doctor for advice on the proper review and treatment of sleep disorders. Refer to the Assessing Fitness to Drive 2003 guidelines (Austroads, 2003) and the requirement for continuing employment as a commercial heavy vehicle driver.

2.4 Signs that a driver is fatigued
Symptoms include:
- Constant yawning
- Blurred vision
- Sore or heavy eyes
- Poor concentration
- Variations in driving speed
- Letting your vehicle drift out of lanes
- Difficulty remembering the last few kilometres
- Impatience
- Poor gear changing, indicator use and use of other vehicle controls.
3. Napping Guidelines

With adequate continuous sleep, napping is an effective means of managing fatigue. If enough quality continuous sleep is obtained by a driver, napping can be used to reduce fatigue during the body clock’s low points and the sleepiness caused by long hours of driving.

These guidelines are designed to help choose the best napping schedule to get the greatest benefits from napping, however, if a driver has severe sleep debt before starting a shift, napping cannot fully replace that debt and the body will demand it be paid back eventually.

3.1 When to take a nap

The timing of a nap is important. In general, the most effective time to take a nap is before significant fatigue and drowsiness occur. That is, naps aimed at preventing fatigue developing are generally more effective at maintaining performance than naps taken when fatigue has already set in. Naps aimed at preventing fatigue should be planned and included in regular scheduling.

If a driver experiences overwhelming sleepiness due to circumstances beyond their control or due to poor scheduling or planning, he/she should stop and obtain proper adequate sleep (at least a minimum continuous rest break). In these circumstances, naps should only be taken as a last resort to reduce fatigue.

The following section outlines the most effective times to take naps with the help of good scheduling and planning so as to reduce and manage fatigue during a shift.

Taking naps before a shift

Taking a nap before beginning a long drive helps prevent fatigue developing during the drive. It particularly helps to reduce the amount of sleepiness felt at the natural lulls caused by our biological clock. This is known as a preventative nap.

Typically this type of nap would be taken before starting a night shift to reduce the drowsiness that drivers experience in the early morning (midnight to 6 a.m.), when most people are normally sleep. When a driver is scheduled to do a night shift, a nap before any loss of sleep takes place, is the most effective means of reducing the effects of fatigue. A nap taken during a night shift can lessen the fatigue felt overnight, but it is more effective to take a preventative nap before the shift starts.

Preventative naps may also be useful when taken in the early morning hours before a day shift to reduce any drowsiness the driver may feel during the ‘afternoon lull’ (2 p.m. to 4 p.m.).
Taking naps during a shift ‘on the road’

If it is not possible for a driver to take a preventative nap before starting a shift, the best time to take a nap while on the road is during the mid afternoon ‘siesta’ hours, between 2 p.m. to 4 p.m. Naps taken during this time of the day are more effective and may improve a driver’s performance better than naps that are taken at other times during the day.

Although the best time for good quality sleep is in the early morning hours (midnight to 6 a.m.), unless a driver is on night shift, it is recommended that this period of time should be used for a longer continuous rest break rather than a short nap. If a nap is taken during these early hours of the morning, often a driver will feel very groggy when he wakes up. This is because this is the time of day when it’s easiest to fall into deep sleep and the driver must allow some time after waking to become fully alert and before starting to drive.

The late morning and in the middle of the day are not ideal times to take a nap. This is because, if we sleep when we are designed to be awake (e.g. in the late morning and in the middle of the day) naps will tend to be shorter and broken and be of less benefit for the tired driver. Sleeping at these times of the day works against the circadian clock which is moving the brain and body into wake mode, since the biological drive for keeping us awake is strongest at these times of the day.

A driver should plan his / her naps ahead of time to take advantage of roadside facilities. Where possible these naps should coincide with the body’s natural drowsiness in the afternoon (2 p.m. to 4 p.m.) or during the hours of midnight to 6 a.m. if a driver is on night shift.

It is important to encourage drivers that if they feel quite tired at any stage during their shift then they should pull over at the next safe place to take a nap before continuing to drive.

### 3.2 How long should the nap last?

The very minimum amount of time for a short nap should be at least 10 minutes. In most cases, a nap should last up to 45 minutes. For a driver who has had adequate rest, during a standard driving shift, an occasional nap of 45 minutes should be enough to maintain a safe level of alertness.

If a driver has an accumulated sleep debt (fatigue built up over a number of days or shifts), then he / she may need to take a longer nap before a driving shift to recover some of that missed sleep. However while on the road, a driver should only take short naps, perhaps of no more than one hour, in order to avoid falling into the deeper stages of sleep. Waking up during the deeper stages of sleep can result in a driver feeling very groggy which can in turn affect performance and alertness.

Sleep takes over in stages or cycles going from shallower into deeper sleep. These sleep cycles last approximately 90 minutes. If a driver needs a longer nap, he / she should take a nap of 80 to 90 minutes to allow a full sleep cycle to take place. The driver will then wake during a shallower sleep cycle and will avoid the heavy grogginess which people often feel when waking from deeper sleep.
3.3 Beware of grogginess on waking

When waking from either a long sleep or a short nap, a driver can experience a short period of grogginess and lethargy. This grogginess usually lasts from 1 to 20 minutes but the length of time it lasts largely depends on the length of the nap. During this time you can be awake but are still slow to react. Grogginess lasts longer when a driver wakes from sleep after accumulating a large sleep debt (hasn’t had enough quality continuous sleep in the past 24 hours or more). Grogginess also occurs when the driver wakes up during the circadian low points of the day (between midnight to 6 a.m. and to a lesser extent between 2 p.m. to 4 p.m.).

The reason for this is that sleep occurs in different stages or cycles, as the body moves from lighter into deeper sleep cycles of approximately 90 minutes. A driver will feel groggier when he / she awakens from the deeper stages of sleep. By having shorter naps a driver wakes up before entering these deeper stages of sleep. This reduces the length of time a driver feels groggy after a nap and he / she will recover more quickly as a result.

If a driver has built up a large sleep debt, or if they are awake for longer, they will tend to fall into the deeper stages of sleep sooner after starting to sleep. These deeper stages of sleep will be longer. As a result, when a driver wakes up from a nap it is more likely that they will be waking up from deeper sleep and will be groggier as their brain and body try to wake up.

If a driver takes a nap during the circadian low points, between midnight and 6 a.m. and between 2 p.m. and 4 p.m., these naps will involve deeper sleep than naps taken at other times of the day. But if a driver takes a nap at the circadian low point in the afternoon their performance levels will greatly improve once they have recovered from the initial grogginess. If a driver has gone without sleep for a length of time it may take about one hour before the grogginess from an afternoon nap disappears.

Allow extra time to become fully alert

If a driver expects to drive shortly after waking from a nap taken during the early morning hours (midnight to 6 a.m. the circadian rhythm low time), he/she needs to allow extra time to become fully alert. This is because sleep inertia (sluggishness) upon waking can be stronger and more difficult to overcome at this time of the day. As mentioned before, the best time to take a nap is in the afternoon since it coincides with the circadian low point in the afternoon, and any grogginess or sluggishness felt afterwards is weaker than during the overnight low.

After any nap, no matter how carefully placed and timed, a driver should still allow a period of ‘recovery time’ after waking up and before resuming work duties. This is to allow any grogginess to disappear. For longer naps, e.g. 45 minutes to one hour, a driver should allow about 15 minutes after waking up to recover alertness before starting to drive.

How to shake off grogginess

Drivers can shake off grogginess by

• experiencing a significant temperature change, e.g. turning up the cabin air conditioning unit;
• taking some moderate exercise e.g. walking, jumping up and down, etc. particularly outdoors;
• drinking a coffee (it takes about 30 minutes to produce a caffeine jolt); or
• starting a conversation with someone until their alertness returns.

3.4 What about drinking coffee?

Coffee is not the best way to fight fatigue. Coffee only provides short-term benefits, and once its effects wear off on a long drive, a driver can feel even sleepier which can lead to an accident. Naps have more long lasting benefits than caffeine.

Another benefit of napping is that it can help reduce driver fatigue and improve a drivers performance without any of the problems associated with taking stimulant drugs. All stimulant drugs have negative side effects which get worse over time.
3.5 Napping preparation

Best conditions for taking a nap (on the road)

To get the best value from naps some special conditions apply. Any sleep which is broken up, for whatever reason such as noise, heat, or discomfort, will not be as reviving as a continuous sleep period. Ideal conditions will help drivers to fall asleep and stay asleep.

Sleep is easiest in dark, quiet conditions, in a comfortable temperature and with good ventilation, preferably lying down. Ear plugs and eye shades are a good idea. Vehicles used for sleep or rest breaks should be fitted with a sleeper berth which complies with the Australian Design Rules and, where practicable, the berth / cabin should be equipped with air-conditioning. If a sleeper berth is not provided then the driver should make other arrangements to get some quality undisturbed sleep.

Naps should be planned into a drivers schedule so drivers can take advantage of road-side facilities which are in a quiet location some distance from the road and at the particular stage of the journey when they feel drowsy.

A tip: if a driver is taking a nap in his/her truck the engine should be turned off and the driver should use a timer to make sure he/she doesn’t oversleep.

Napping and sleeping at home

Families play an important role in helping drivers get adequate sleep at home. Drivers can set up conditions at home so that they get as much sleep as they need. Together with their family, the driver needs to work on reducing noise, light and other disturbances, and on developing a regular sleep pattern. To do this, find the best room temperature to get sleep (probably between 18º C to 22º C), ask the family to be extra quiet or wear ear plugs, and hang extra thick curtains or wear eye shades especially if the driver needs to get sleep during the day.
4. Company Policy Issues

4.1 Employers have a duty of care

Fatigue is a foreseeable hazard under Occupational Safety and Health legislation and naps are an effective way of helping to control and manage driver fatigue.

Occupational Safety and Health legislation requires employers to provide a safe working environment, and for employees to operate a safe system of work for the benefit of themselves and others in the workplace. That is their duty of care requirement. For the purpose of the Act a truck is a workplace and the others in this dynamic workplace are other road users.

Driver fatigue is now a recognised and foreseeable hazard in the road transport industry. Both employers and drivers have a duty of care to control this hazard, and when drivers take naps to manage fatigue they are acting within their duty of care.

4.2 Company napping policy and duty of care

Encourage napping

- When needed, employees should be encouraged to take a preventative nap before reporting for work so as to reduce the risk of an accident occurring during shift.
- Naps cannot be enforced on the job, but company policies should encourage drivers to take naps during their shift by building in adequate time for naps in trip schedules.
- If a driver has not had adequate sleep or a main rest break, schedules may need to be adjusted to allow the driver to take a recovery nap.
- A company napping policy should not be used to extend driver schedules beyond legitimate limits, but it should promote safer operations.
- A company policy on napping in the workplace should be developed with input from the key stakeholders; drivers, dispatchers, driver managers, other employees, supervisors and managers. This will result in company-wide ownership of the policy. The purpose of developing a napping policy is to show the company’s:
  - commitment to safe work practices and safety;
  - commitment to employee health; and
  - compliance with the duty of care of the Occupational Safety and Health legislation.
Consider drivers’ health

- A driver health program should include a napping policy.
- Drivers with sleep apnoea may suffer from excessive on-the-job sleepiness and may need to take frequent naps. Drivers should undergo medical screening for sleep disorders so they can be advised on how to manage these sleep disorders. Companies may consider medical examinations in accordance with the standard Assessing Fitness to Drive 2003 (Austroads).
- It is a normal part of aging that as we get older, night time sleep starts to get shorter and more fragmented, and day time sleepiness starts to increase. Sleep apnoea also gets increasingly likely with age. This means napping may be an increasingly important strategy for older drivers.
- Company health programs should also include information on the risks of obesity, and provide guidance for drivers on healthy diets, physical fitness, and exercise.

Provide training

- The ease with which people can nap depends very much on the individual. A worthwhile idea is to give drivers some training in relaxation techniques so they can get the most benefit from napping opportunities by shortening the time taken to fall asleep.
- Information and training on how to get the greatest benefit from quality sleep breaks and naps should be provided to employees and their families as part of a driver induction programme and on an ongoing basis (short refresher courses).
5. A Napping Checklist

The following is a checklist of the key points from this document. It should be used for quick referral by both employers and drivers after this document has been read through.

Basic facts about sleep

- A driver needs an average total of 7-8 hours of quality sleep in each 24-hour period and a minimum of at least 7 continuous hours rest to help maintain a satisfactory level of alertness.

- If a driver gets only the minimum amount of sleep required then he / she may need some additional sleep in the form of one or more naps of 30-45 minutes each, throughout the 24-hour period. This strategy will result in safe, alert driving and safer transport operations.

- Fatigue sets in over a period of time. A driver’s reaction times will start to slow, their level of alertness will drop, they will start to have memory lapses, be unable to focus on tasks, show lack of awareness, mood changes and display a lack of judgement. The fatigued driver may also experience micro-sleeps of up to 15 seconds.

- Eventually, the sleepiness can become so overwhelming that no amount of motivation, training, experience, or professionalism will prevent the driver from falling asleep uncontrollably.

- As a normal part of ageing our night time sleep starts to become shorter, lighter, and more fragmented and we start to get sleepier during the day. This means that napping may be an increasingly important strategy for older drivers.

- Normally, sleep alternates through light sleep to deep sleep every 90 minutes.

- The less quality continuous sleep a driver has had, the quicker the driver will enter deep sleep during a nap.

- The deeper the sleep the greater the risk of gogginess (sleep inertia) on awakening and the longer it will take a driver to recover alertness.

Types of naps

- By taking a nap away from the work place in preparation for work a driver will maintain alertness during long shifts even if they have already had adequate sleep.

- When a driver has not had adequate sleep they will usually need longer naps to recover from fatigue and make up for lost sleep.

- Preventative naps will generally be more effective at maintaining performance and alertness than a driver were to take naps when they are already fatigued.

When naps should be taken

- A nap supplements a driver’s main continuous sleep break.

- Naps should be planned ahead (drivers schedule) to take advantage of rest facilities and where possible to coincide with the drivers natural drowsiness. The best times to plan for a nap are during the afternoon siesta hours (2 p.m. to 4 p.m.) or during the early morning (midnight to dawn - 6 a.m.) if a driver is working the night shift.

- When a driver feels quite tired at any stage during their shift.
Taking responsibility for fatigue management

- Although naps cannot be enforced on the job, company policies should encourage drivers to take naps when they feel the need by building in adequate time for short rest breaks into trip schedules.
- Where a driver has not obtained adequate quality sleep, their trip schedule may need to be altered to allow for a recovery nap.
- A company napping policy should not be used to extend trip schedules beyond reasonable limits, but the policy should promote safer transport operations and more alert drivers.
- Information and training on getting the most benefits from quality sleep and naps should be provided to employees and their families as part of the drivers’ induction and also on an ongoing basis.
- Naps are helpful in maintaining driver performance if a driver occasionally does not get adequate sleep breaks, but naps should not be used as a substitute for quality continuous rest breaks.
- If a driver finds that they need longer or more frequent naps then the driver is undoubtedly significantly sleep deprived and needs a longer major anchor sleep. If this is a regular occurrence, the driver may need to undergo a medical test to determine if they are suffering from a sleeping disorder.

Best conditions for napping

- Special conditions apply for a driver to get the most from naps. Sleep is easiest in dark, quiet conditions, in a comfortable temperature with good ventilation, preferably lying down.
- For security reasons, the driver should contact their supervisor when planning a nap and when they wake up and resume driving.
- Drivers should be reminded to turn off the engine and use a timer to make sure they don’t oversleep.
- For longer naps, e.g. 45 minutes to 1 hour, the driver should allow 15 minutes after waking up to recover alertness before driving. The longer the nap the more time will be needed to recover from drowsiness.
6. Common Terms Used In These Guidelines

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td>Circadian rhythm</td>
<td>Circadian rhythms or the body clock regulates behaviour and biological functions on a 24 hour basis. Sleep and wakefulness are programmed into the human body. Sleepiness is greatest between midnight to 6 a.m. and to a lesser extent between 2 p.m. to 4 p.m.</td>
</tr>
<tr>
<td>Circadian low points (or natural lulls)</td>
<td>Between midnight to 6 a.m. and to a lesser extent between 2 p.m. to 4 p.m. in the afternoon.</td>
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<tr>
<td>Major anchor sleep</td>
<td>A continuous rest break taken at a circadian low point e.g. between midnight and 6 a.m. A continuous rest break at this point of the day helps to ‘anchor’, or stabilize an individual’s internal body clock.</td>
</tr>
<tr>
<td>Minimum continuous rest break in a 24 hour period</td>
<td>As stipulated in the revised driving hours regulations e.g. 7 hours minimum continuous rest in 24 hours under the default Standard hours. More details on Basic and Advanced Fatigue Management work and rest hours are provided in the National Driver Work Diary or by contacting your local road transport agency.</td>
</tr>
<tr>
<td>Night Rest Break</td>
<td>At least 7 hours of continuous rest between 10 p.m. and 8 a.m.</td>
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<tr>
<td>Sleep apnoea</td>
<td>Sleep apnoea is a sleep disorder. Although the sufferer sleeps, it is poor quality sleep. Symptoms of sleep apnoea include heavy snoring broken by sudden periods of silence, restless sleep and constantly being tired during the day. If you think you may be suffering from sleep apnoea or any other sleep disorder you should see a doctor for advice.</td>
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<tr>
<td>Sleep debt</td>
<td>Failure to get normal sleep results in a sleep debt that builds up over time. This sleep debt can only be paid back by getting undisturbed, continuous, quality sleep.</td>
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<tr>
<td>Short rest break</td>
<td>Any rest break that lasts 15 minutes but less than one hour. It does not include non-driving work time.</td>
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