

Ref:	NR/L2/SCO/302/03
Issue:	1
Date:	06 June 2020
Compliance date:	05 September 2020

NR/L2/SCO/302

Module 03

Supplier Qualification – Sentinel Scheme Requirements

This document is the property of Network Rail. It shall not be reproduced in whole or part nor disclosed to a third party without the written permission of Network Rail.
© Copyright 2020 Network Rail.

Uncontrolled copy once printed from its electronic source.

Published and Issued by Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN.



Ref:	NR/L2/SCO/302/03
Issue:	1
Date:	06 June 2020
Compliance date:	05 September 2020

Contents

1 Purpose 3

2 Scope 3

3 Management Control 3

3.1 Management Structure 3

3.2 Management Systems 3

3.3 Policy Control 4

3.4 Contract of Sponsorship Management 5

3.5 Management of Sub Sponsors 6

4 Misconduct Processes 7

4.1 Objective 7

5 Personal Protective Equipment 7

5.1 Objective 7

5.2 Requirements 8

6 Occupational Health 8

7 Alcohol and Drugs Arrangements 8

7.1 Objective 8

8 Managing worker and suppliers' workers' fatigue 9

8.1 Objective 9

8.2 Requirements 9

Ref:	NR/L2/SCO/302/03
Issue:	1
Date:	06 June 2020
Compliance date:	05 September 2020

1 Purpose

This document seeks to mitigate the risks that suppliers import when working on Network Rail Managed Infrastructure by setting out the management system and processes required for suppliers wishing to be a sponsor within the Sentinel Scheme.

2 Scope

This module specifies the requirements for supplier qualification.

It applies to:

- a) all Network Rail employees involved in the procurement of suppliers, regardless of their role,
- b) Suppliers who sponsor staff within the Sentinel Scheme.

This module outlines the requirements for managing fatigue and working hours and demonstrates the means by which compliance with Regulation 25 of the 'Rail and Other Guided Transport Systems (Safety) Regulations 2006' is realised.

3 Management Control

3.1 Management Structure

3.1.1 Objective

The objective is to establish an adequate organisational framework for the safe and efficient delivery of a contract. This includes the imbedded capability to understand the railway operating environment and the specific requirements of railway contracts.

Requirement

The supplier shall:

- a) appoint personnel responsible for the management of Sentinel sponsored individuals;
- b) confirm management of sponsorship duties within the Sentinel scheme are defined within documented organisation charts;
- c) capture responsibilities within applicable role profile statements / job descriptions.

3.2 Management Systems

Objective

The objective is to confirm the organisation has arrangements in place to manage its activities in a safe and effective manner (including time, quality, cost, health, safety and environmental.)

Requirement

The supplier shall have documented procedures to manage:

Ref:	NR/L2/SCO/302/03
Issue:	1
Date:	06 June 2020
Compliance date:	05 September 2020

- a) routine briefings and information cascade processes;
- b) pre-sponsorship;
- c) contract of sponsorship;
- d) sub-sponsors;
- e) competence management;
- f) working hours;
- g) provision of PPE and other personal issue equipment;
- h) procurement, management, calibration and provision of safety critical equipment;
- i) management of misconduct events (including the reporting to Network Rail Sentinel Investigations);
- j) misconduct investigations;
- k) management of records;
- l) prompt de-sponsoring of individuals;
- m) membership of an Independent and confidential industry reporting service (e.g. Network Rail and TfL preferred / approved system CIRAS);
- n) familiarisation of protection staff with 'complex' areas.

3.3 Policy Control

3.3.1 Objective

The objective is to demonstrate to employees and other affected parties, the supplier's top-level management commitment to compliance with the Sentinel Scheme Rules.

Requirement

The supplier shall:

- a) create an Alcohol and Drugs Policy statement;
- b) create a Fatigue Management (Working Hours) Policy statement;
- c) communicate the policies to all employees on induction, starting a contract and following policy changes;
- d) communicate the policies to their suppliers (as necessary) and other interested parties;
- e) review policies at least annually;
- f) check that a Senior Manager employed within the organisation has signed the above policy statements;
- g) date the policy statement.

Ref:	NR/L2/SCO/302/03
Issue:	1
Date:	06 June 2020
Compliance date:	05 September 2020

3.4 Contract of Sponsorship Management

3.4.1 Objective

The objective is that the supplier and primary sponsored staff understand their responsibilities within the Sentinel Scheme Rules and have arrangements in place to meet them.

Requirement

The Supplier, when acting as the Primary Sponsor, shall have documented processes in place for establishing a 'Contract of Sponsorship' with each individual Sentinel Card holder.

As part of the Contract of Sponsorship, the Supplier shall have processes for:

- a) undertaking checks of an individual's suitability and capability to work on the relevant rail infrastructure prior to engaging in a Contract of Sponsorship;
- b) provision and management of a valid Sentinel Card;
- c) delivery of an Induction Briefing which will include as a minimum the Rules and Responsibilities contained within the Sentinel Scheme Rules;
- d) issue of PPE, branded with the Primary Sponsor's logo;
- e) delivery of regular briefings, Rule Book updates and Sentinel Scheme Rule updates;
- f) provision for training, briefing and assessment events at required intervals;
- g) provision of Safety Critical equipment to enable them to undertake their tasks trackside. Typical examples would be Lookout equipment, Marker Boards or Conductor Rail Indicator Devices (CRID);
- h) controlled issue of personal issue information such as handbooks and relevant standards;
- i) providing advice, guidance or instruction on any restrictions based on medication and other medical fitness issues;
- j) mentoring support to develop the competence of the individual;
- k) defining the contractual relationship between the primary sponsor and individual and whether sub- sponsors are permitted;
- l) monitoring the return of all relevant passes and permits;
- m) issue of Contracts of Sponsorship to primary sponsored staff;
- n) retaining records of contracts of sponsorship for all primary sponsored staff;
- o) recording who the sponsored individual is employed by where they are not employees of the sponsoring organisation.

NOTE: Organisations are only allowed to act as Primary Sponsor for individuals who are undertaking work for the sponsoring organisation whether directly or through a sub-contractor.

Ref:	NR/L2/SCO/302/03
Issue:	1
Date:	06 June 2020
Compliance date:	05 September 2020

3.5 Management of Sub Sponsors

3.5.1 Objective

The objective is that the supplier and sub-sponsored staff understand their responsibilities within the Sentinel Scheme Rules and have arrangements in place to meet them.

Requirement

The Supplier, when acting as the Sub-Sponsor, shall have documented processes in place for establishing a 'Contract of Sponsorship' with each individual Sentinel Card holder.

These arrangements shall include:

- a) requesting permission to use an Individual from their Primary Sponsor and receiving confirmation of sub-sponsorship status before resourcing the Individual to work.
- b) a mechanism for reviewing and then either approving or rejecting the sub-sponsors request. Where rejected, a reason for rejection shall be provided;
- c) a documented list of sub-sponsors and any associated agreements for sharing of labour that are in place between the Organisations;
- d) a process for reviewing Sentinel Reports, and for analysing usage by sub-sponsors;
- e) the means of obtaining information on an individual from the Sub-Sponsor.
- f) co-operating with and providing all information to the Primary Sponsor to enable the Primary Sponsor to manage the overall safety of the individual.

This information shall include:

- i. working hours, safety incidents, competencies used and competence short- falls.
- ii. notifying any safety issues or misconduct events as soon as is reasonably practicable after the event has occurred.
- iii. providing all other safety related information on request.
- g) co-operating with the Primary Sponsor in the management of working hours.
Where a risk assessment has been conducted and an exceedance in working hours approved, this information should be provided to the Primary Sponsor.
- h) provision of Safety Critical equipment required to enable the undertaking of trackside tasks where they put an individual to work. An example would be the provision of Lookout Equipment, Marker Boards or Current Rail Indicator Devices (CRID).

The Sponsor is responsible for ensuring this equipment is provided fit-for-purpose, in accordance with the Sentinel Scheme Rules.

Ref:	NR/L2/SCO/302/03
Issue:	1
Date:	06 June 2020
Compliance date:	05 September 2020

- i) maintaining all records associated with any works undertaken by an individual as is required by the Sentinel Scheme Rules.
- j) maintaining all records associated with a misconduct investigation and provide these to the Primary Sponsor and Network Rail Sentinel Investigations.
- k) maintaining the necessary insurance for works undertaken by individuals working on their behalf, regardless of their sponsorship arrangements.
- l) advising the Primary Sponsor of any misconduct event immediately. Where the individual is working for the Sub-Sponsor at the time of a misconduct event, the Sub-Sponsor is responsible for enacting misconduct process, and collating information and evidence to support a Local Investigation by the Primary Sponsor.
- m) issuing Contracts of Sponsorship to sub-sponsored staff.
- n) retaining records of Contracts of Sponsorship for all sub-sponsored staff.

4 Misconduct Processes

4.1 Objective

The objective is that the supplier understands their responsibilities within the Sentinel Scheme Rules and has arrangements in place to meet them.

Requirement

The Supplier shall have documented processes in place for dealing with instances of misconduct of sponsored staff as defined in the Sentinel Scheme Rules, including:

- a) investigating where any suspected misconduct event becomes apparent;
- b) collection of information from sub-sponsors to enable the collation and conclusion of the local investigation including the reporting to Sentinel Investigations;
- c) maintaining all records associated with the sponsorship of an individual, as required by the Sentinel Scheme Rules;
- d) maintaining all records associated with a misconduct investigation and providing these to Network Rail Sentinel Investigations;
- e) not de-sponsoring an individual on the grounds of misconduct without first conducting an investigation and misconduct hearing for that individual.

5 Personal Protective Equipment

5.1 Objective

The objective is that the employees of the supplier are provided with appropriate PPE and are trained and competent in its use.

Ref:	NR/L2/SCO/302/03
Issue:	1
Date:	06 June 2020
Compliance date:	05 September 2020

5.2 Requirements

Suppliers shall have arrangements for the issuing, checking and monitoring of Personal Protective Equipment (PPE), including:

- a) the issue and management of rail specific PPE for all primary sponsored personnel;
- b) confirming the suitability of PPE for all sub-sponsored personnel when working on behalf of the Supplier;
- c) retaining records of issue.

6 Occupational Health

Objective

The objective is to confirm that the supplier has arrangements in place to monitor the health of their employees and to meet occupational health surveillance requirements.

Requirements

Suppliers shall have arrangements in place for checking that workers under its control meet and maintain the health requirements specified in Network Rail standards and Railway Group Standards, including:

- a) carrying out pre-employment medical examinations;
- b) checking that persons engaged to work on rail infrastructure meet the requirements set out for 'Pre- employment, pre-appointment & periodic testing for 'Alcohol & Drugs';
- c) having a process for managing any employee declaring:
 - 1) a negative change to their state of health; or
 - 2) the taking prescription drugs that might impact on the safety of themselves or others.
- d) obtaining medical self-certifications for Track Visitor Permits;
- e) checking their suppliers' arrangements for employee medicals.

7 Alcohol and Drugs Arrangements

7.1 Objective

The objective is to minimise the risk to and imposed by workers carrying out tasks whilst under the influence of drugs or alcohol.

Requirement

The supplier shall have arrangements in place for checking that all workers under its control do not access Network Rail Managed Infrastructure or carry out safety critical tasks while under the influence of drugs or alcohol.

The arrangements shall include:

Ref:	NR/L2/SCO/302/03
Issue:	1
Date:	06 June 2020
Compliance date:	05 September 2020

- a) briefing employees on alcohol and drugs (Organisation/client/railway group) policy i.e. pertaining to work activity;
- b) managing and recording employees (and their suppliers' employees) taking prescription and over the counter medicine;
- c) selecting and appointing an approved alcohol and drugs testing provider;
- d) routine, pre-appointment testing - such as pre-employment and following transfer to a post which requires the employee to be qualified in Personal Track Safety or is designated a safety critical work post;
- e) carrying out a risk-based programme of random testing;

NOTE 1: 5% per annum is typical.

- f) carrying out 'for-cause' testing* – i.e. following accidents, serious incidents or suspected of being unfit through drugs or alcohol, where applicable;
- g) implementing actions following a failure of an alcohol and drugs test;
- h) access and update arrangements to the Sentinel database for changes to status of sponsored employees;
- i) dealing with appeals.

NOTE 2: A 'For cause' contract shall not be required where there is evidence of suitable alternative arrangements for the provision of 'for cause' screening. There must be suitable arrangements in place for all contracts/projects current/live at the time of audit.

8 Managing worker and suppliers' workers' fatigue

8.1 Objective

The objective is to minimise the risk of workers not being able to discharge their duties safely due to fatigue.

8.2 Requirements

The supplier shall have arrangements in place for identifying, risk assessing, planning and preventing the fatigue of employees (including agency), and that their contractors and sub-contractors have arrangements in place to manage fatigue of their workers (including agency), including:

- a) identifying the activities and tasks in the Suppliers and Supplier's sub-contractors, where fatigue could result in impaired performance and increased operating risk;
- b) carrying out fatigue risk assessments. Health & Safety Executive (HSE's) Fatigue Risk Index or similar may be utilised;
- c) the working time limits that workers shall be permitted to work; *
- d) planning work so that exceedances are not required;
- e) authorising unforeseen exceedances (including undertaking appropriate risk assessments);

Ref:	NR/L2/SCO/302/03
Issue:	1
Date:	06 June 2020
Compliance date:	05 September 2020

- f) monitoring actual hours worked;
- g) analysing trends in hours worked (including travel time) and correlating this with error and incident data, skill availability and sickness/absence data and taking appropriate action in the light of identified patterns and trends;
- h) plans and objectives for controlling actual hours;
- i) plans and objectives for reducing unforeseen exceedances (if applicable);
- j) arrangements to prevent workers from carrying out or continuing to carry out work activities where there is reason to believe they are unfit due to fatigue;
- k) confirming that sponsored staff 'swipe-in' and 'swipe-out' when working trackside (Network Rails preferred option is to use the fatigue management element of the Sentinel application).
- l) assessment of what fatigue arrangements are appropriate for their staff including compliance with ROGS.

*** NOTE:** Suppliers should note the general duty of care about the planning and control of the combination of individual employee's work, walking time, handover/wash-up time and travel time.