



RISQS Audit Protocol

Sentinel

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Preface

This protocol meets the RISQS Board Industry Minimum Requirements for Prequalification.

The audit is intended to facilitate the validation of information submitted by Supplier's on to the RISQS platform at the prequalification stage and to assess additional areas of compliance as required by Infrastructure Managers and the RISQS Board. Audits take place upon initial entry to the scheme, on a periodic basis and where there are relevant changes to the Organisation's information within RISQS. Auditors and Auditees (i.e. organisation subject to audit) are required to familiarise themselves with the content of the audit and its requirements prior to the audit commencing.

Guidance Notes

The questions and guidance notes within this document are applicable to all suppliers with the exception of those questions and bullet points' denoted (*TfL requirement*) which apply only to suppliers specifically limiting their scope of works to Transport for London (TfL) infrastructure.

Assessment Requirements

1. Management Control

1.1 Management Structure

The auditor shall verify that the personnel responsible for the management of Sentinel sponsored personnel and the management of sponsorship within the Sentinel scheme are defined within the documented Organisational charts and that responsibilities are stated within the applicable role profiles statements / job descriptions.

1.2 Management Systems

- The auditor shall verify that documented procedures within the Organisation's Management System contain processes for the management of;
- Contract of Sponsorship
- Pre-sponsorship
- Competence Management
- Management of sub-sponsors
- Routine Briefings and Information Cascade Processes
- Management of Working Hours
- Procurement, management, calibration and provision of safety critical equipment
- Provision of Personal Protective Equipment (PPE) and other personal issue equipment
- Management of misconduct events
- Misconduct investigations
- Management of records
- De-sponsoring of individuals
- Membership of an Independent and confidential industry reporting service (e.g. Network Rail and TfL preferred / approved system CIRAS)
- Familiarisation of protection staff with 'complex' areas (TfL requirement)

1.3 Policy Control

The Organisation has produced, briefed and displayed copies of an:

- Alcohol & Drugs Policy statement.
- Fatigue Management (Working Hours) Policy statement.

Auditor note: A Senior Manager should have signed and dated the above policy statements (ensure the manager is still employed by the organisation).

2. Safety Risk Management

2.1 Personal Protective Equipment (PPE)

The auditor shall verify that the Organisation has processes for, and records supporting, the issue and management of rail specific PPE for all primary sponsored personnel and mechanisms for ensuring the suitability of PPE for all sub-sponsored personnel when working on behalf of the organisation.

3. Human Resources including Occupational Health Management

3.1 Contract of Sponsorship Management

The auditor shall verify that the Organisation, when acting as the Primary Sponsor, has documented processes in place for establishing a 'Contract of Sponsorship' with each Individual Sentinel Card Holder.

As part of the contract of sponsorship, the auditor will verify that the Organisation has processes for;

- Provision and management of a valid Sentinel Card
- Defining the contractual relationship between the primary sponsor and individual and whether sub- sponsors are permitted.
- Provision of Safety Critical equipment to enable them to undertake their competencies trackside. Typical examples would be Lookout equipment, Marker Boards or Current Rail Indicator Devices (CRID).
- Undertaking checks of an individual's suitability to work on the relevant rail infrastructure prior to engaging in a contract of sponsorship.
- Delivery of an Induction Briefing which will include as a minimum the Rules and Responsibilities contained within the Sentinel Scheme Rules.
- Issue of PPE, branded with the Primary Sponsor logo.
- Delivery of Regular Briefings, Rule Book Updates and Sentinel Scheme Rule Updates.
- Provision for training and assessment events at required intervals.
- Controlled issue of Personal issue information such as Handbooks and relevant Standards.
- Providing Advice, Guidance or Instruction on any restrictions based on medication and other medical fitness issues.
- Mentoring support to develop the competence of the Individual.
- Monitoring the return of all relevant passes and permits. ((TfL requirement)

The auditor shall review evidence of Issue and agreement of the contract between the sponsor and the sponsored individual

3.2 Management of Sub Sponsors

The auditor shall verify that Sponsors shall have processes in place for the management of sub-sponsors.

These arrangements shall include;

- A process for reviewing and then either approving or rejecting the sub-sponsors request. Where rejected, a reason for rejection must be provided;
- A documented list of sub-sponsors and any associated agreements for sharing of labour that are in place between the organisations;
- A process for reviewing Sentinel Reports, and for analysing usage by sub-sponsors;
- The means of obtaining information on an individual from the Sub-Sponsor. The sub-sponsor is required to request permission to use an Individual from their Primary Sponsor. The sub-sponsor must receive confirmation of sub-sponsorship status before resourcing the Individual to work.
- The sub-sponsor is responsible for providing all information to the Primary Sponsor to enable the Primary Sponsor to manage the overall safety of the individual. This includes, but is not limited to:
 - Information on working hours;
 - Safety incidents:
 - Competencies used and competence short- falls.

Note: The sub-sponsor must notify any safety issues or misconduct events as soon as is reasonably practicable after the event has occurred. All other safety related information should be provided on request.

- The sub-sponsor is required to co-operate 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.
- The Sponsor contracted to provide the Individual to work on the relevant rail infrastructure, is responsible for the provision of the Safety Critical equipment required to enable the Individual to undertake their competencies trackside.
 - 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 Management System.
- The sub-sponsor is responsible for maintaining all records associated with any works undertaken by an individual on the relevant rail infrastructure, as is required by the Sentinel Management System requirements. The sub-sponsor is also required to maintain all records associated with a misconduct investigation and provide these to the Primary Sponsor and the relevant rail infrastructure manager (e.g. Network Rail, TfL) in the event of a Formal Investigation or Appeal Hearing.
- The sub-sponsor is required to maintain the necessary insurance for works undertaken by individuals working on their behalf, regardless of their sponsorship arrangements.
- The sub-sponsor is responsible for 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.

3.3 Misconduct Processes

The auditor shall verify that the Organisation has processes and documented responsibilities for misconduct reporting and investigation, where any suspected misconduct event becomes apparent. Documented processes shall include the collection of information from sub-sponsors to enable the collation and conclusion of the Local Investigation. The Primary Sponsor is responsible for maintaining all records associated with the sponsorship of an individual, as required by the Sentinel Management System. The Primary Sponsor is also required to maintain all records associated with a misconduct investigation and provide these to the relevant infrastructure manager (e.g. Network Rail, TfL) in the event of a Formal Investigation or Appeal Hearing. A Sponsoring organisation must not de-sponsor an individual on the grounds of misconduct without first investigating and holding a misconduct hearing for that individual.

3.4 Occupational Health

The Auditor should establish the following:

- The supplier has arrangements in place for checking that workers under its control meet and maintain the health requirements in as specified in customer / client standards (e.g. Network Rail and / or TfL) and Railway Group Standards.

The arrangements shall include:

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

3.5 Alcohol and Drugs Management

The Auditor should establish the following:

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

- The arrangements shall include:
- briefing employees on alcohol and drugs (Organisation /client/railway group) policy i.e. pertaining to work activity;
- managing employees (and their suppliers' employees) taking prescription and over the counter medicine;
- selecting and appointing an approved alcohol and drugs testing provider;
- 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;
- carrying out annual Alcohol & Drugs screening (TfL requirement)
- 'Fit for Work' policy – checks of fitness to work when booking on for duty – signed declarations (TfL requirement)
- carrying out a risk-based programme of random testing (5% per annum is typical);
- carrying out 'for-cause' testing* – i.e. following accidents, serious incidents or suspected of being unfit through alcohol or drugs, where applicable;
- implementing actions following a failure of an alcohol and drugs test;
- access and update arrangements to Sentinel databases for changes to status of sponsored 'Sentinel' employees;
- dealing with appeals;

Auditor Note: * - 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.

3.6 Fatigue Management

- The Auditor should establish that general arrangements shall include:
- Identifying the activities and tasks in the organisation and supplier's organisations where fatigue could result in impaired performance and increased operating risk;
- Carrying out fatigue risk assessments Fatigue Risk Index (FRI). HSE's FRI or similar may be utilised
- The working time limits that workers shall be permitted to work; *
- Planning work so that exceedances are not required;
- Authorising unforeseen exceedances (inc. Risk assessments);
- Monitoring actual hours worked;
- 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;
- Plans and objectives for controlling actual hours;
- Plans and objectives for reducing unforeseen exceedances (if applicable);
- 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;
- Assessment of what fatigue arrangements are appropriate for their staff including compliance with ROGS**.

Auditor Note *: Suppliers shall take note of 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.

Auditor Note **: This standard outlines the requirements for managing fatigue and working hours and demonstrates how compliance with Regulation 25 of the 'Rail and Other Guided Transport Systems (Safety) Regulations 2006' is realised.