

Non-Trackside



## RISQS Audit Protocol

### Non-Trackside

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# Contents

Preface .....	4
Guidance Notes.....	4
Assessment Requirements.....	4
1. Management Control.....	4
1.1 Management Systems .....	4
1.2 Policy Control .....	5
1.3 Management Structure.....	6
1.4 Health & Safety Competent Support .....	6
1.5 Management of Legal and Other Requirements .....	6
1.6 Document Control .....	7
1.7 Performance Monitoring and Measuring .....	7
1.8 Compliance with CDM Regulations 2015.....	8
2. Safety Risk Management .....	9
2.1 Health and Safety Risk Controls.....	9
2.2 Personal Protective Equipment .....	9
2.3 Welfare Arrangements .....	9
2.4 Refusal to Work on the Grounds of Health and Safety (Work Safe) .....	10
2.5 Implementation of Risk Controls .....	10
2.6 Communication and Coordination.....	10
3. Environmental Management.....	11
3.1 Environmental Risk .....	11
4. Management of Accidents and Incidents .....	12
4.1 Accident and Incident Reporting and Investigation.....	12
4.2 Restoration of Service (Business Continuity) .....	12
5. Competence Management .....	13
5.1 Recruitment and Induction .....	13
5.2 On-going Competence Management .....	13
6. Supply Chain Management.....	14
6.1 Supplier and Subcontractor Management .....	14
7. Plant & Equipment.....	15
7.1 Management, Maintenance and Servicing.....	15
8. Human Resources including Occupational Health Management .....	16
8.1 Occupational Health .....	16

8.2	Alcohol and Drugs Management .....	16
8.3	Fatigue Management.....	17
8.4	Pre-Sponsorship / Pre-Use Processes .....	17
8.5	Contract of Sponsorship Management.....	18
8.6	Management of Sub-Sponsors.....	18
8.7	Misconduct Processes.....	19

# 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 Systems

The Auditor should establish how the Organisation has implemented its business managements systems and how it ensures the assurance and integrity of these systems, including but not limited to; Safety, Health, Environmental and Quality Management aspects.

- As a minimum a documented management system, appropriate to the scope of services, that meets all the Safety, Health, Environmental and Quality requirements and satisfies sector specific requirements relevant to the Organisations scope of activities.
- That preferably the Organisation has in place, systems certificated by a UKAS (or equivalent) accredited body;
  - ISO 9001 (Quality)
  - ISO 14001 (Environmental)
  - OHSAS 18001 (Health and Safety)
- The most recent 3rd party surveillance reports should be reviewed to establish that no significant shortfalls were identified that could import unacceptable risks to clients and the general public.

The Organisations management systems shall address and contain documented processes for the management of (but not limited to);

- Implementing processes
- Review of the management systems and identifying improvements
- Validating Organisational change (prior to implementation of the changes).
- Managing compliance with the Sentinel Scheme Rules; including;

- Routine Briefings and Information Cascade Processes
- Pre-sponsorship / Pre-use checks
- Contract of Sponsorship
- Management of sub-sponsors
- Competence Management
- Management of Working Hours
- Provision of PPE and other personal issue equipment
- Procurement, management, calibration and provision of safety critical equipment
- Management of misconduct events
- Misconduct investigations
- Management of records
- De-sponsoring of individuals

## 1.2 Policy Control

The auditor shall verify that the Organisation can demonstrate, to employees and other affected parties, the Organisation's top-level management commitment to Safety, Health, Environmental and Quality requirements and identify the overall framework within which the Organisation operates. The supplier shall have the following policy statements:

Auditor Note: A single integrated policy statement, covering Safety, Health, Environmental and Quality requirements is permissible where the Organisation has an Integrated Management System).

- Health and Safety
- Environmental
- Quality
- Alcohol & Drugs
- Fatigue Management (Working Hours)
- Refusal to Work on the Grounds of Health and Safety (Work Safe)

The Health and Safety Policy statement shall contain a clear commitment to:

- Health & Safety, in so far as is reasonably practicable

The Environmental Policy Statement shall contain a clear commitment to:

- Preventing pollution
- Specifically protecting the environment, with reference to aspects of work activities that are environmentally significant
- Specifically minimising the environmental impact, for the life cycle; (including disposal), of plant, equipment, and other physical assets under the control of the supplier

The Quality Policy statement shall contain:

- Whether the supplier is certificated to any standards (e.g. ISO 9001 or any specific standards for the type of product or service)
- A commitment to work with suppliers and customers to establish and maintain the highest quality standards

The policies / policy shall:

- Be endorsed at top level management (i.e. signed-off at Director Level, ensuring that the person is still employed by the business)
- Be dated and current (subject to regular review at least annually)
- Cover all areas of the supplier's business
- Commit to;
- Setting and monitoring Safety, Health, Environmental and Quality objectives

- Continual improvement in Safety, Health, Environmental and Quality performance
- Providing sufficient resources for the management of Safety, Health, Environmental and Quality

The Organisation shall have arrangements in place for managing policy statements, including:

- Communicating policies to all employees on induction, starting a contract and following policy changes
- Communicating policies to their suppliers (as necessary) and other interested parties

### 1.3 Management Structure

The Auditor shall verify how the Organisation's Management structure is defined including:

- A current Organisational chart detailing the structure of the Organisational and key managerial posts i.e. Safety, Health, Environmental, Quality, technical, etc. and their responsibilities for working within the relevant sector.
- That the Organisation has identified 'Safety Critical' roles.
- That the Organisation has identified 'Key Safety' roles.
- That the Organisation has identified the role(s) responsible for the management and administration of the Sentinel scheme arrangements (including the individual authorised to act on behalf of the Organisation to process the Non Trackside Declaration), defined within documented organisation charts and that responsibilities are captured within applicable role profiles statements / job descriptions.
- That all roles are defined; i.e. Job descriptions and / or Roles and responsibility statements and that these have been briefed to the post holder and acknowledged / signed by the post holder
- Evidence that deputies or alternative arrangements are in place for 'Key roles'.
- That there are suitably qualified personnel for the services provided. Can the Organisation demonstrate that nominated competent personnel have been appointed with responsibility for the relevant engineering streams e.g. Professional Head?
- If there are different structures on projects how this relates to the overall hierarchy, what are the processes for the nomination of key staff for projects?
- Organisational structure changes must be subject to change validation processes prior to implementation, including:
  - Risk assessment (including reviewing impact on product code capability, Safety and Environment.
  - Sign off at appropriate management level.

### 1.4 Health & Safety Competent Support

The Auditor shall verify how the Organisation ensures that they have adequate:

- Health and Safety support to manage the work activities identified within their profile
- As a minimum, the competent personnel possess a NEBOSH general certificate or equivalent.
- That the competent personnel are members of an appropriate professional institution e.g. Institute of Occupational Safety and Health (IOSH); International Institute of Risk and Safety Management(IIRSM).

### 1.5 Management of Legal and Other Requirements

The Auditor shall verify how the Organisation ensures that they are aware of the requirements of, and changes to legislation and standards (Including relevant sector / industry standards and regulations):

- How the Organisation accesses and reviews Health, Safety and Environmental legislation and standards.

- How the Organisation accesses and reviews legislation and standards applicable to the rail sector appropriate to the scope of services provided (e.g. Railway Group Standards, Network Rail Company Standards and TfL QUENSH).

## 1.6 Document Control

The Auditor shall verify what the Organisation's arrangements are for the identification of all documents that require control to ensure the effectiveness of operations:

- The Organisation has a Document Control Procedure that identifies the key documents requiring control.

Such as:

- Relevant Legislation
- National and International Standards,
- Industry / Sector standards (e.g. Railway Group, Network Rail and Transport for London)
- The Organisations management systems documentation
- Contract specific documentation and technical specifications
- The Document Control Procedure should identify:
  - How documents are reviewed and changes identified.
  - How documents are issued and reach their point of use; in particular multi sites.
  - How cancelled and superseded documentation is managed
  - Record retention and archiving
- How does the Organisation control the issue of drawings to specialist functions and construction functions /Organisations?
- A master list of controlled documents and their status is maintained.

## 1.7 Performance Monitoring and Measuring

The auditor should establish that the supplier has arrangements in place for the proactive and reactive monitoring of their own performance and that of their suppliers. The arrangements shall include:

- Internal audit of the organisations management systems on a regular basis by competent personnel
- That the Organisation had developed a documented audit programme / schedule
- That internal audit reports are available
- Arrangements for the implementation of such as Site Inspections, Safety Tours etc.
- That Site Inspection, Safety Tour reports are available
- That such as corrective actions identified via audit and safety inspections are reviewed by management
- That the Organisation manages the close out of corrective actions in a timely manner
- Analysing and reviewing performance data and other key performance indicators, including the identification of trends (including their own and their supplier's monitoring data, e.g. site inspection reports, audits, accident frequency reports, etc.)
- Reviewing and discussing suppliers' performance with their suppliers.
- How does the Organisation ensure that staff (including contractors) are in possession of the correct certification required when attending site e.g. Industry Common Induction (ICI) LU endorsement etc.
- Quality inspections of the installation work are carried out (i.e. Inspection and Test Plans ITPs).

## 1.8 Compliance with CDM Regulations 2015

The auditor shall verify how the Organisation complies with the relevant requirements within the Construction (Design and Management) Regulations 2015:

- If the Organisation acts as a Client can it demonstrate mechanisms for:
  - Appointing other duty holders
  - Ensuring relevant information is provided to other duty holders
  - Ensuring the Principal Designer and Principal Contractor carry out their duties
  - Allocating sufficient time and resources (including welfare arrangements)
  
- If the Organisation acts as a Principal Designer can it demonstrate mechanisms for:
  - Planning, managing, monitoring and coordinating health and safety in the pre-construction phase of a project including:
    - identifying, eliminating or controlling foreseeable risks;
    - ensuring designers carry out their duties;
    - preparing and providing relevant information to other duty holders;
    - Liaising with the principal contractor to assist in the planning, management, monitoring and coordination of the construction phase.
  
- If the Organisation acts as a Designer can it demonstrate mechanisms, when preparing or modifying designs, to:
  - Eliminate, reduce or control foreseeable risks that may arise during construction and the maintenance and use of a building once it is built.
  - Provide information to other members of the project team to help them fulfil their duties.
  
- If the Organisation acts as a Principal Contractor can it demonstrate mechanisms for:
  - Planning, managing, monitoring and coordinating the construction phase of a project. This includes:
    - liaising with the client and principal designer;
    - preparing the construction phase plan;
    - ensuring that adequate resources are available to satisfy the work requirements;
    - organising cooperation between contractors and coordinating their work.
  
  - Ensuring suitable site inductions are provided
  - Ensuring Site Security (preventing unauthorized access)
  - Ensuring workers are consulted and engaged in health and safety
  - Ensuring welfare facilities are provided.
  - If the Organisation acts as a Contractor can it demonstrate mechanisms for:
    - Planning, managing and monitoring construction work under their control so that it is carried out without risks to health and safety;
    - Ensuring that adequate resources are available to satisfy the work requirements;
    - For projects involving more than one contractor, coordinating their activities with others in the project team
    - For single-contractor projects, preparing a construction phase plan



## 2. Safety Risk Management

### 2.1 Health and Safety Risk Controls

The Auditor shall verify how the organisation incorporates Health and Safety controls into its risk management process, including:

- The production of such as; Health and Safety Risk Assessments and assessments for the Control of Substances Hazardous to Health (COSHH) are formally documented within the Organisation's Management Systems
- Designated responsibility for the compiling and authorising the risk assessments
- That the competence for personnel authorised to compile risk assessments is defined
- Whether risk assessments are generic to the scope of operations or unique to each contract.
- How the organisation ensures that applicable site issues are incorporated into risk assessments.
- The auditor shall confirm that infrastructure specific risks appropriate to the scope of services are captured within the Organisation's risk management process.
- How risk assessments are communicated to staff, clients and Organisations / subcontractors
- The mechanism for periodic reviews of risk assessments and the types of information the Organisation receives that may initiate a review of the risk assessments.
- That the Organisation holds Material Safety Data sheets (MSDS) on all substances used.
- That the Organisation undertakes formal COSHH assessments based upon the MSDS's
- That COSHH Assessments are available at the point of use, have been briefed to employees, subcontractors and the client as applicable and records are retained.
- Does the Organisation use Behavioural Safety programs to reinforce safety / re-educate unsafe behaviours?

### 2.2 Personal Protective Equipment

The Auditor should establish the Organisations arrangements for the issuing, checking and monitoring of Personal Protective Equipment (PPE), including the issue and management of rail specific PPE for primary sponsored personnel and mechanisms for ensuring the suitability of PPE for sub-sponsored personnel when working on behalf of the organisation.

- The arrangements for issue at induction and following loss or damage
- That PPE is provided free of charge to own employees
- The arrangements for monitoring use of PPE
- PPE is called up where applicable in the risk assessment processes
- All sub-contractors working on associated projects have suitable controls in place for PPE.
- Compliance with The Lifting Operating and Lifting Equipment Regs 1998 (LOLER) and Provision and Use of Work Equipment Regs 1998 (PUWER) as appropriate (e.g. Fall Arresters etc.)

### 2.3 Welfare Arrangements

The Auditor should establish the Organisation's arrangements for ensuring that adequate welfare facilities are provided for personnel under their control:

- The welfare requirements e.g. toilets, washing facilities have been assessed and implemented as appropriate.

## 2.4 Refusal to Work on the Grounds of Health and Safety (Work Safe)

The Auditor should establish the Organisation's arrangements for managing refusal to work on the grounds of Health and Safety (Work Safe):

- That the Organisation has a documented Work Safe Policy and supporting procedure
- That records of briefing of the Work Safe arrangements are available
- That the Work Safe arrangements include a cascade procedure in the event of conflict / disagreement
- That employees are not penalised for refusing to work on grounds of Health and Safety

## 2.5 Implementation of Risk Controls

The Auditor should establish the Organisation's arrangements for implementing the risk mitigation control measures identified through the Risk Assessment process:

- That the risk controls identified within the Organisation's processes have been communicated throughout their organisation.
- That the responsibility for implementation of these arrangements has been allocated to competent persons, including Professional Heads.
- How the control measures are monitored / reviewed on a regular basis by personnel who understand the work being assessed.
- That where method statements, work package plans and task briefings are produced, risk assessments are incorporated or referenced.

Auditor note: Auditor should look at a sample of method statements to ensure that risk assessments have been referenced during the compilation of method statements.

- Emergency Response Plans and details such as; Emergency Contact list, Nearest Hospitals, Emergency Equipment, First Aid Equipment and competent First Aid trained staff have been included in such as Method Statements, Work Package Plans and Task Briefings as applicable.
- Evidence of the briefing of Emergency arrangements to workers

## 2.6 Communication and Coordination

The auditor shall verify the Organisations arrangements for identifying and communicating safety related information to employees and other interested parties; and the arrangements for identifying and seeking co-operation from others who their works affect or whose work may affect them and adequately co-operating with them.

- The supplier should have processes in place for the controlled issue of such as; Method Statements, RAMS, Work Package Plans and Task Briefings etc. to staff and their suppliers (as applicable)
- The supplier must have a process for the validation and checking of their suppliers Method Statements, RAMS, Work Package Plans and Task Briefings (as applicable)
- That there are documented procedures in place for the issue of safety instructions, alerts, bulletins etc.
- Records of the briefing of such as; risk assessments, safety instructions, safety alerts and bulletins are retained

# 3. Environmental Management

## 3.1 Environmental Risk

The Auditor should establish that the Organisation has put in place suitable processes / controls for Environmental management appropriate to the scope of its activities:

- That the Organisation has identified controls to manage environmental legislative requirements appropriate to the scope of its activities
- That the Organisation has identified the Environmental Aspects and Impacts associated with the scope of its works
- That competent personnel have been involved with the assessment of Environmental Aspects and Impacts associated with the scope of its works
- That Environmental Risk Management Processes are formally documented within the organisation's Management Systems
- The responsibility and competency for compiling and authorising environmental risk assessments has been defined
- How does the Organisation ensure issues such as environmental noise and restrictions on working hours are managed?
- Whether risk assessments are generic to the Organisation's scope of operations or unique to each contract.
- How Environmental risk assessments are communicated to staff, clients and the sub-contractors.
- That records of briefings are retained.
- How does the Organisation verify that staff have appropriate knowledge of Environmental issues
- The mechanism for periodic reviews of environmental risk assessments and the types of information the Organisation receives that may initiate a review of the risk assessments
- The Organisation's arrangements for the management of waste (recycling etc.)

## 4. Management of Accidents and Incidents

### 4.1 Accident and Incident Reporting and Investigation

The Auditor shall verify the Organisation's arrangements for the investigating and reporting of all accidents, incidents, near misses and close calls:

- Does the Organisation demonstrate awareness of responsibilities for reporting as detailed in the RIDDOR?
- Does the Organisation have a nominated person for the statutory reporting of accidents and Incidents as identified in RIDDOR (Head Office and site if different)?
- Does the Organisation maintain records of accidents, incidents, near misses and close calls (This includes Safety and Environmental incidents)?
- How have the accident reporting process been communicated to its workforce and sub-contractors?
- That the Organisation has a documented process for undertaking Local Investigations
- This should include: competent people are undertaking the investigation; all operatives are aware of the investigative process; a mechanism for feeding into the Clients formal enquiry process; that arrangements are in place to assist and provide records to enforcement agencies (Police, Environment Agency, HSE).
- Does the Organisation produce annual reports and analysis of Accidents, Incidents, Close calls and Dangerous Occurrences Statistics? are reports available?
- Does the Organisation use results of investigations to; update training, re-train workers, communicate lessons learnt etc.?

### 4.2 Restoration of Service (Business Continuity)

The auditor shall verify the Organisation's arrangements for the preparation and implementation of a business continuity management process, which ensures that an effective, coordinated programme can be put into place?

- Has Business Continuity been addressed within the business using a formal plan or corporate process? – specify what is in place.
- Do Business Continuity arrangements include a phased recovery plan with key recovery stages identified?
- Has the Organisation allocated responsibility to a senior person within the business for business continuity?
- Is a command and control structure identified in all key areas of the business to ensure that the programme is implemented quickly to ensure minimal disruption to production / service?
- Has a communications person (For Business Continuity issues) been appointed to deal with media, internal communication and other interested parties including customer base where applicable?
- Evidence to support that Business continuity and emergency response plans have been tested.

# 5. Competence Management

## 5.1 Recruitment and Induction

The Auditor should establish the Organisation's arrangements for the recruitment and induction of employees and others under its control including sub-contractors and self-employed personnel?

- What are the Organisation's arrangements for selecting personnel (e.g. advertising selection, interview) Suitable induction process and evidence of implementation
- How does the Organisation assess / verify that workers carrying out protection activities can communicate in English (both written and oral)?
- Has the Organisation effectively communicated the need for workers carrying out safety critical tasks to carry identification: (induction / toolbox talks / briefing records) (TfL requirement)
- That records of induction and ongoing communication are held.

## 5.2 On-going Competence Management

The auditor shall verify the effectiveness of the competency management system;

- Have the relevant competency standards / requirements been identified documented; these may be drawn from external organisations
- Where competency standards have been developed internally these must be signed off by competent personnel
- How does the Organisation identify competence requirements for its scope of activities?
- How does the Organisation record what training or levels of competency are required for the position?
- Evidence that current personnel have the required competencies, qualifications etc.to deliver the organisations scope of activities
- Does the Organisation have the capability to meet the professional qualification requirements and review and changes or updates for its activities? (if applicable)
- How does the Organisation identify and meet industry / client-specific competence/ training requirements? (such as: Sentinel scheme, CSCS, internal training etc.)
- How does the Organisation identify certification expiry / re-training / competency assessment event dates?
- How does the Organisation ensure that staff (including contractors) are issued with the correct certification required e.g. Industry Common Induction (ICI) with LU endorsement, Fire Training, etc. and where applicable Safety Critical Work Identification cards? (minimum details Name of holder, Photograph, Name and address of employing Organisation) when attending site
- Is assessment / verification of training carried out by suitably competent / approved personnel? (e.g. Sentinel registered / NSARE approved training providers or TfL approved training providers / assessors)
- Are there reviews of personnel performance and personal training plans put in place?
- With respect to Signalling, does the Organisation have documented process in place for managing compliance with the Institute of Rail Signalling Engineers (IRSE) Licensing Scheme?
- Does the Organisation have a process in place for the mentoring and development of personnel deemed "not yet competent"?

# 6. Supply Chain Management

## 6.1 Supplier and Subcontractor Management

The Auditor shall verify how the Organisation ensures effective supplier and subcontractor management:

- Documented arrangements for the management of suppliers and subcontractors
- Current list of approved Suppliers / Sub-contractors (Register, database etc.)
- Supply chain approval process; Supplier / Subcontractor questionnaires forms?
- Supplier / Subcontractor audit reports
- Has the Organisation identified relevant licences, trade associations, memberships that their supply chain should hold (dependent upon the scope of service offered)?
- What is the process for ensuring information is provided to potential suppliers and understood by them to assist them with their bids (programmes/ specifications/ meetings etc.)
- What controls does the Organisation have in place to manage sublet work/design packages?
- Where the organisation contracts out work, have suitably competent subcontractors been identified?
- What approval mechanism does the Organisation have in place prior to placing a contract for works with an approved supply chain member (Contract sign off, Tender reviews etc.)
- Has the Organisation identified the minimum levels of insurance required to be held by its supply chain?
- Does the Organisation undertake supply chain auditing or use third parties to undertake this for them?
- Does the Organisation have a process for the recording and monitoring of any corrective actions raised at supply chain audits?
- Does the Organisation undertake reviews of supply chain performance and how are the results of these reviews communicated (e.g. post contract reviews)
- Does the Organisation have a mechanism to verify and ensure that products and components procured are approved and fit for purpose?

Auditor note – the auditor must consider the level of risk imported into the business by the relevant supplier in the level of control implemented and findings made accordingly.

# 7. Plant & Equipment

## 7.1 Management, Maintenance and Servicing

The auditor shall establish how the Organisation ensures that its work equipment is fit for purpose?

- Does the Organisation have an up to date inventory of equipment, plant and machinery that it operates?
- Is each item of equipment, plant or machinery uniquely identified?
- What are the organisation's arrangements to ensure that all plant, small hand tools and equipment are inspected prior to use?
- How are calibration requirements controlled (if applicable)
- How does the Organisation assure itself that equipment from 3rd party is fit for purpose (where applicable)?
- Does the Organisation have processes in place to identify and deliver statutory and other inspections/ service maintenance e.g. Vehicle mounted fire extinguishers, Lifting Accessories, LEV?
- Do the maintenance and service procedures identify a quarantine arrangements to ensure equipment that is not fit for purpose cannot be used?
- If lifting equipment and its ancillary (chains/ slings / straps) equipment are used, does the Organisation possess processes to ensure they remain safe?
- Is equipment maintained by competent personnel (e.g. Internal or 3rd Party)?
- Competence details for internal staff involved in maintenance, inspections and servicing of equipment.
- That scheduled maintenance plans / programmes are in place
- That maintenance specifications / manuals are in place and authorised /approved by a competent person
- Where applicable does the Organisation have a documented process for the reporting of high risk / safety related defects?

# 8. Human Resources including Occupational Health Management

## 8.1 Occupational Health

The auditor shall verify how the supplier meets occupational health surveillance requirements?

- Does the Organisation undertake routine health surveillance to meet statutory / client requirements?
- Is occupational health surveillance / advice in-house or by a specialist provider, onsite or remote?
- Are long-term health issues risk assessed? How are the potential hazards identified?
- What control options are considered to bring the risks down to as low as is reasonably practicable?
- Processes to ensure that control measures remain appropriate to individual's condition/ requirements
- If personnel change roles are their occupational health requirements assessed prior to starting?
- How are results from such as Health checks fed back to the Organisation?
- How often is the occupational health process reviewed? Is this review recorded?
- How does the Organisation manage their subcontractors in this area, if applicable?
- Where does the Organisation store its occupational health information on employees?
- Does the Organisation have a policy for how long records must be retained?
- Do employees have an opportunity to review the Records kept regarding them if requested?

## 8.2 Alcohol and Drugs Management

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 drugs or alcohol. The arrangements shall include:

- Documented processes for implementing its Alcohol & Drugs policy and arrangements
- Briefing employees on Alcohol & Drugs policy and arrangements pertaining to their work activities
- Selecting and appointing an approved Alcohol & Drugs testing provider
- Implementing screening for; Pre-appointment (such as pre-employment or following transfer to a post which requires the employee to be screened, e.g. Sentinel sponsored, designated safety critical or key safety posts (currently an annual requirement for TfL safety critical posts).
- Implementation of a risk-based programme of random screening (5% per annum is typical);
- Evidence of access to 'For Cause' screening services with an approved service provider
- Evidence of the implementation of 'For-Cause' screening; i.e. following accident, serious incidents or where there are concerns or suspicions of a person being unfit through alcohol or drugs, where applicable;
- Managing employees (and their suppliers' employees) taking prescription and over the counter medicine;
- 'Fit for Work' policy – checks of fitness to work when booking on for duty; i.e. signed declarations (TfL requirement)
- Arrangements for implementing actions following a failure of an Alcohol & Drugs test
- Arrangements for dealing with appeals
- Arrangements for managing any workers declaring / volunteering
  - a negative change to their state of health
  - the taking prescription drugs that may impact on the safety of themselves or others.
- Arrangements for dealing with rehabilitation (where applicable)



- Access / update arrangements to Sentinel databases for changes to status of sponsored workers

Note: In relation to staff holding Industry Common Induction (ICI) competence only, the obligation is only to implement 'Random' unannounced and 'For Cause' Alcohol & Drugs screening. Where non-trackside staff carry out Safety Critical activities or hold 'Key Safety' posts the full range of Alcohol & Drugs screening arrangements apply.

## 8.3 Fatigue Management

The Auditor should establish that the Organisations general arrangements shall include:

- Documented policy and arrangements for managing hours of work and fatigue management
- 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
- That the Organisation has identified the working time limits that workers shall be permitted to work\*
- Planning work so that exceedances are not required
- Arrangements for recording, assessing and authorising unforeseen exceedances
- Recording and monitoring of actual hours worked
- Maintaining KPIs on the number of exceedances (i.e. per period / per annum)
- 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 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 Regulation 25 of the 'Rail and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS) is realised.

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.

## 8.4 Pre-Sponsorship / Pre-Use Processes

The auditor shall verify that the Organisation has defined and implemented processes for the undertaking of 'Pre- sponsorship and / or 'Pre-Use' checks for all individuals that it is intending to sponsor, including;

Prior to Primary Sponsorship;

- Checks to ensure that there are no suspensions in place that may prevent the individual from holding a Sentinel Smart Card.
- Conducting and documenting a Pre-Sponsorship interview to determine that the individual is legally eligible to work in the UK and can sufficiently communicate in verbal and / or written English (dependent on the safety critical nature of the competencies to be held).

Prior to Sub-Sponsorship;

- Check to ensure that the individual wishes to undertake work for the Sub-sponsor, in addition to the work undertaken on behalf of the Primary Sponsor.
- Confirm the Primary Sponsor for the individual and that the 'Contract of Sponsorship' permits Sub- sponsors.
- Request permission to Sub-sponsor an individual from the Primary Sponsor, via the Sentinel scheme database.

The Organisation shall be able to provide evidence that Pre-Sponsorship / Pre-Use checks have been undertaken in advance of the individual undertaking any duties on behalf of the sponsor.

## 8.5 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 developed and implemented processes for;

- The issue of a Contract of Sponsorship to each individual to be sponsored, which will be signed and dated by both the individual to be sponsored and the Organisation's management responsible representative.
- Completing an induction briefing with each individual when they join their sponsorship, with the induction to include as a minimum;
  - The Contract of Sponsorship
  - The rules and responsibilities contained within the scheme rules

The Contract of Sponsorship as a minimum requirement shall;

- Commit the Primary Sponsor to fulfilling the role of employer of the individual for the purposes of Health and Safety (regardless of the employment status of the individual)
- Define the responsibilities of the individual and the Primary Sponsor in relation to compliance with the Sentinel scheme rules.
- Ensure the issue of suitable PPE, in accordance with the Sponsors defined PPE policy / procedures
- Provision for training, assessment and mentoring at required intervals
- Require the individual to notify the primary sponsor of any changes in circumstances, including health issues, that may need the Primary Sponsor to take action to ensure the individual's continued fitness to work
- Defining whether sub-sponsors are permitted
- Provision and management of a valid Sentinel Card
- A process for reviewing Sentinel Reports, and for analysing usage by sub-sponsors;

## 8.6 Management of Sub-Sponsors

The auditor shall verify that Primary Sponsors have both defined processes in place (and where applicable evidence of implementation) for the management of sub-sponsors. These arrangements shall include;

- A mechanism for reviewing, and then either approving or rejecting the Sub-sponsor's request

Note: 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 and analysing the usage of individuals by Sub-sponsors
- The means of obtaining information on an individual from the Sub-Sponsor; this includes, but is not limited to:
  - Information to allow monitoring and management of working hours of individuals (Shifts worked with Sub-Sponsors must be considered in the monitoring of working hours and the management of fatigue).
  - Information related to safety incidents or misconduct events to allow the Primary Sponsor to undertake and conclude local investigations where breaches of scheme rules have occurred.
  - Information related to competencies used and competence short-falls.

Auditor Note: A Sub-sponsor is responsible for the proactive provision of all information to the Primary Sponsor to enable the Primary Sponsor to manage the overall safety of the individual. The sub-sponsor must notify any safety issues, misconduct events, breaches of rules as soon as is reasonably practicable after the event has occurred. All other safety related information should be provided on request.

## 8.7 Misconduct Processes

The auditor shall verify that the Organisation has processes and documented responsibilities for a misconduct reporting and investigation, where any suspected breaches of Sentinel rules have occurred or have been reported (Note: Non-Trackside Sponsor Declaration Rules, Appendix A – Breaches and Investigations refers to what these breaches may include). 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.

Primary Sponsors must have processes in place for 'de-sponsoring' individuals for which they are responsible, which includes providing a reason for 'de-sponsorship' and writing to the individual to cancel the 'Contract of Sponsorship'.

Note: A Sponsoring Organisation must not de-sponsor an individual on the grounds of misconduct without first investigating and undertaking a misconduct hearing for that individual.