



RISQS Audit Protocol

Industry Minimum Requirements, Sentinel and Safe Work Planning Scheme modules

Document no.: RISQS-AP-009

| Revision | Author | Checked by | Approved by | Date approved | Reason for revision |
|----------|---------------|-------------|---------------|---------------|---------------------|
| 01 | Carl Rulton | Alan Thomas | Richard Sharp | 27-02-18 | Initial Issue |
| 02 | Gillian Scott | | | 27-03-19 | Logo change only |

Contents

| | |
|---|----|
| Preface | 4 |
| Guidance Notes..... | 4 |
| Assessment Requirements..... | 5 |
| 1. Management Control..... | 5 |
| 1.1 Management Structure..... | 5 |
| 1.2 Health & Safety Competent Support | 6 |
| 1.3 Management of Legal and Other Requirements | 6 |
| 1.4 Compliance with CDM Regulations 2015..... | 7 |
| 1.5 Management Systems | 7 |
| 1.6 Policy Control | 8 |
| 1.7 Document Control | 11 |
| 1.8 Monitoring | 11 |
| 1.9 Design Management and Control | 13 |
| 2. Safety Risk Management | 14 |
| 2.1 Health and Safety Risk Controls | 14 |
| 2.2 Control of Substances Hazardous to Health | 14 |
| 2.3 Implementation of Risk Controls | 14 |
| 2.4 Personal Protective Equipment | 15 |
| 2.5 Refusal to Work on the Grounds of Health and Safety (Work Safe) | 15 |
| 2.6 Welfare Arrangements | 15 |
| 2.7 Communication and Coordination..... | 15 |
| 3. Environmental Management | 17 |
| 3.1 Environmental Risk | 17 |
| 4. Management of Accidents and Incidents | 18 |
| 4.1 Accident and Incident Reporting and Investigation..... | 18 |
| 4.2 Emergency and Contingency Planning..... | 18 |
| 4.3 Restoration of Service (Business Continuity)..... | 19 |
| 5. Supply Chain Management..... | 20 |
| 5.1 Supplier and Subcontractor Management | 20 |
| 5.2 On-going Competence Management | 21 |
| 6. Competence Management | 23 |
| 6.1 Recruitment and Induction..... | 23 |
| 6.2 On-going Competence Management | 23 |

| | | |
|-----|---|----|
| 7. | Plant & Equipment..... | 25 |
| 7.1 | Management, Maintenance and Servicing..... | 25 |
| 8. | Human Resources including Occupational Health Management..... | 27 |
| 8.1 | Occupational Health | 27 |
| 8.2 | Contract of Sponsorship Management..... | 28 |
| 8.3 | Management of Sub Sponsors..... | 28 |
| 8.4 | Misconduct Processes..... | 29 |
| 8.5 | Alcohol and Drugs Management | 29 |
| 8.6 | Fatigue Management..... | 30 |

Preface

This protocol meets the RISQS Industry Minimum Requirements.

The audit is intended to facilitate the validation of information submitted by Supplier's on to the RISQS platform at the capability assessment stage and to assess additional areas of compliance as required by Infrastructure Managers and the RISQS Council. 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 should establish how the Management structure is defined including:

- Evidence of current Organisational structure identifying key managerial posts i.e. Safety, Health, Environmental, Quality, technical, etc. and their responsibilities for working within the relevant sector.
- Evidence that roles have defined job descriptions 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.
- If there are different structures on projects how this relates to the overall hierarchy.
- 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.

(Sentinel 1.1)

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

(SWP 1.1)

The auditor shall verify that:

- The Organisation has documented the safe system of work planning activities included within the scope of approval and on which infrastructures these are delivered
- The Organisation is acting as a Primary Sponsor to personnel
- The Organisation can demonstrate knowledge and awareness of the requirements for safe system of work planning and development of Safe work packs (SWP)
-

(SWP 1.4)

The auditor shall verify that the Organisation has documented the organisation structure applicable to the management and delivery of safe systems of work planning activities in compliance with the Roles and Responsibilities as defined by the infrastructure manager for the infrastructures on which the organisation operates (e.g. Network Rail Standard 'Safety of People at Work on or near the line' NR/L2/OHS/019)

The auditor shall verify that the Organisation has arrangements in place for the following:

- Reviewing the SWP requirements for the infrastructures on which the organisation operates.
- Documenting the organisational structure that is adequate for the delivery of safe system of work planning activities in accordance the relevant infrastructure managers requirements.
- Keeping the organisational structure documentation current and relevant at all times.
- Setting up and implementing a means of communication with those who provide key Safety, Health, Environmental, Quality, local knowledge or technical expertise where this is procured from outside the organisation.

- Demonstrating their understanding of the roles and responsibilities of the provider in planning a safe system if work in relation to roles undertaken by others (e.g. Principal Contractors (PCs), On-Track Plant Operations Scheme (POS) providers and relevant infrastructure managers).
- Having arrangements in place for risk assessing, validating and briefing out material changes to the management system.
- Nominating roles to projects and ensuring those nominated have the skills and local knowledge to carry out the planning activities.

1.2 Health & Safety Competent Support

(IMR 1.2)

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 requirement, they 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).

1.3 Management of Legal and Other Requirements

(IMR 1.3)

The Auditor shall verify how the Organisation has ensured that they maintain awareness of the requirements of, and changes to legislation and standards (Including relevant sector / industry standards and regulations):

- Has the Organisation maintained access to and reviews of Safety, Health and Environmental legislation and standards.
- Has the Organisation maintained access to and reviews of 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).

(SWP 1.3)

The auditor shall verify that:

- the Organisation has documented the safe system of work planning activities included within the scope of approval
- the Organisation is acting as a Primary Sponsor to personnel
- the Organisation can demonstrate knowledge and awareness of the requirements for safe system of work planning and development of Safe work packs (SWP)

1.4 Compliance with CDM Regulations 2015

(IMR 1.4)

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 that it can 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, that it can 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 that it can 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 that it can 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 that it can 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

1.5 Management Systems

The Auditor should establish how the Organisation has ensured that the Health, Safety and Quality Management Systems are assured:

- Where applicable, has the Organisation maintained its ISO 9001:2015 quality certificate and/or OHSAS 18001:2007 certificate and/or an ISO14001:2015 certificate issued by a UKAS (or equivalent) accredited Organisation in place.

- As a minimum, has a documented management system, appropriate to the scope of services, that meets all the Safety, Environmental and Quality requirements detailed within this document been maintained.

Auditor Note: The most recent 3rd party surveillance reports should be reviewed to establish that no significant shortfalls were identified that could import unacceptable risk to clients and the general public.

- Where applicable has the Organisation maintained documented procedures that cover key issues relating to the hire out/supply/maintenance of Possession only Rail Vehicles.
 - Purchase of new machines
 - Accreditation of maintenance plans
 - Modification of machines
 - Maintenance procedures
 - Annual brake test procedure
 - RCI test procedure

(Sentinel 1.2)

The auditor shall verify that documented procedures within the Organisation's Management Systems contain processes for the management of –

- Routine Briefings and Information Cascade Processes
- Pre-sponsorship
- 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
- 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)

(SWP 1.2)

The auditor shall verify that the Organisation management system(s) contains documented procedures for the management of:

- Organisation structure
- Managing the Organisation approval as a Safe Work Planning Provider
- Identification and provision of Insurance requirements
- Selection and Use of Suppliers
- Resources
- Competence Management
- Planning
- Emergency Planning
- Communication and Co-ordination
- Monitoring
- Communication and Investigation of breaches of safe system of work planning arrangements and processes

1.6 Policy Control

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

The supplier shall have the following policy statements:

- Health and Safety;
- Environmental;
- Quality.

Auditor note: A single integrated policy statement, in compliance with the Safety, Health, and Environmental requirements and Quality objectives, is permissible where the supplier has an integrated management system.

- The policies/policy shall:
 - meet UK legislative requirements;
 - be dated and current;
 - be endorsed at top level management (i.e. signed-off at Director Level);
 - cover all areas of the supplier's business.
- The Health and Safety Policy statement shall contain a clear commitment to:
 - safety, in so far as is reasonably practicable;
 - providing sufficient resources for the management of health and safety;
 - setting and monitoring safety objectives;
 - continual improvement in safety performance.
- 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;
 - setting and monitoring environmental objectives;
 - continual improvement in environmental performance.
- 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);
 - the setting and monitoring of quality objectives;
 - a commitment to work with suppliers and customers to establish and maintain the highest quality standards;
 - a commitment to continual improvement in quality performance.
- The supplier shall have arrangements in place for managing policy statements, including:
 - communicating them to all employees on induction, starting a contract and following policy changes;
 - communicating them to their suppliers (as necessary) and other interested parties;
 - reviewing them (as a minimum annually).

(Sentinel 1.3)

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

- Alcohol and Drugs Policy statement.
- Fatigue Management (Working Hours) Policy statement.
- The supplier shall have arrangements in place for managing policy statements, including:
- communicating them to all employees on induction, starting a contract and following policy changes;
- communicating them to their suppliers (as necessary) and other interested parties;
- reviewing them (as a minimum annually).

A Senior Manager should have signed the above policy statements and they should be dated (ensure the manager is still employed by the Organisation).

(SWP 1.6)

The auditor shall verify that the supplier has arrangements in place for the proactive and reactive monitoring of the effectiveness of the railway safe systems planning activities.

The arrangements shall include:

Continuous review

Managers, Supervisors (including responsible managers) shall carry out informal and routine inspections to review the effectiveness of planning and task delivery by the observation of staff at work including:

- Unsafe behaviours, activities and/or conditions
- Corrective actions implemented to address unsafe behaviours, activities and/or conditions
- Evidence of feedback on these activities provided to the person in charge
- Local arrangements used to record concerns/risks identified and action plans put in place to prevent reoccurrence and drive continual improvement
- Key performance indicators used by the Organisation to measure compliance with the requirements for safe systems of work planning.

Monitoring Safe Work Pack (SWP) compliance

The responsible manager, shall each period:

- Monitor the return of all SWP's that have been produced. Where a pack is not returned a record shall be kept and an investigation initiated to identify the reason for non-return.
- shall maintain a record of the number of SWP's issued and not implemented.
- Maintain a record of all instances of SWP's being verified on the same shift as the work.
- Review all SWP's that have been returned with highlighted errors/amendments.
- Maintain evidence that discussions of any errors found have been discussed with the person in charge and any other individuals responsible for those errors;
- Record any actions taken to prevent re-occurrence of errors found.
- Review a percentage of completed and implemented SWP in line with the level set by the relevant Infrastructure Manager (e.g. Network Rail require at least 10% of completed and implemented SWP's; (Or Review a minimum of 50 SWP's where an Organisation prepares more than 500 SW'Ps per period).

Reviews of implemented plans shall identify and assure whether the SWP:

- Produced was accurate, appropriate and within the timescales.
- Was verified and authorised as required prior to implementation;
- All relevant fields were completed accurately (including signatures).
- Was implemented as planned and any changes made were authorised as required
- Errors/amendments identified by the person in charge have been corrected prior to re-issue of the SWP.

Monitoring of safe system of work use

- Documented processes by which Senior managers (or other nominated equivalent accountable and responsible persons) monitor the level of work carried out under each level of the hierarchy of control for operational risk.
- Records to support that the monitoring of the level of work carried out under each level of the hierarchy of control for operational risk. Has been implemented.

1.7 Document Control

The Auditor should establish that the Organisation's arrangements for the identification of all documents that require control to ensure the effectiveness of operations have been maintained:

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

Such as:

- National and International Standards,
- Relevant Legislation.
- Industry and Contract Specific Documentation, including, but not limited to such as; Railway Group Standards, client / customer standards and technical specifications.
- Documents supporting the Organisation's processes.
- 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.
 - The process for cancelled and superseded documentation.
 - Archiving and retention.
- How does the Organisation control the issue of drawings to specialist functions and construction functions/organisations?
- The master list of controlled documents and their status has been maintained.
- The Auditor will establish that the robust system in place, where applicable, for ensuring that the following documentation is provided for each machine and trailer in use has been maintained:
 - Engineering Acceptance (all pages) and endorsements
 - Network rail product acceptance or letter of exemption
 - Record of Thorough Examinations
 - Load radius charts (only for machines fitted with RCI's)
 - Log book/operator inspection report book
 - Brake test certificate
- For Machine specific documentation has the Organisations nominated responsible manager / individual changed during the period since the last audit?

1.8 Monitoring

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:

- That the management systems are assessed internally on a regular basis by competent personnel.
- That a documented audit schedule is prepared.
- That internal audit reports are available.
- That corrective actions raised through the internal audit process are reviewed by management and that the Organisation has a managed process for the control of corrective actions.

- Obtaining and collating their own and their supplier's monitoring data, e.g. site inspection reports, audits, accident frequency reports, etc.
- Analysing and reviewing performance data and other key performance indicators, including the identification of trends.
- Reviewing and discussing suppliers' performance with their suppliers.
- Identifying and closing out corrective actions and concessions in a timely manner.
- During the inspection process, the Organisation must ensure on-site personnel are executing their duties in a safe manner.
- 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; Fire Training; Drugs Alcohol Medical Screening Programme (DAMSP) and Track Safety. (TfL requirement)
- Quality inspections of the installation work are carried out.

(SWP 1.5)

The Auditor should establish that the document control procedures include content of plans. The Organisation must demonstrate that all plans produced include:

- Site Diagram
- Visual Schematics
- Hazard Information
- Emergency Contact Numbers
- Safe System of Work Arrangements
- Interface Arrangements
- Plans are recorded on the correct templates

The auditor shall verify that personnel have access to all relevant documentation, which should include the Hazard Directory, Sectional Appendix, planning tools, visual schematics, site diagrams and records of local knowledge held.

The Organisation will demonstrate that it has adequate change management controls captured within the document control arrangements. Change management controls will detail controls for managing change to the plan, both during the planning phase and at the point of execution of work.

(SWP 1.6)

The auditor shall verify that the supplier has arrangements in place for the proactive and reactive monitoring of the effectiveness of the railway safe systems planning activities.

The arrangements shall include:

Continuous review

Managers, Supervisors (including responsible managers) shall carry out informal and routine inspections to review the effectiveness of planning and task delivery by the observation of staff at work including:

- Unsafe behaviours, activities and/or conditions
- Corrective actions implemented to address unsafe behaviours, activities and/or conditions
- Evidence of feedback on these activities provided to the person in charge
- Local arrangements used to record concerns/risks identified and action plans put in place to prevent reoccurrence and drive continual improvement
- Key performance indicators used by the Organisation to measure compliance with the requirements for safe systems of work planning.

Monitoring Safe Work Pack (SWP) compliance

The responsible manager, shall each period:

- Monitor the return of all SWP's that have been produced. Where a pack is not returned a record shall be kept and an investigation initiated to identify the reason for non-return.
- shall maintain a record of the number of SWP's issued and not implemented.
- Maintain a record of all instances of SWP's being verified on the same shift as the work.
- Review all SWP's that have been returned with highlighted errors/amendments.
- Maintain evidence that discussions of any errors found have been discussed with the person in charge and any other individuals responsible for those errors;
- Record any actions taken to prevent re-occurrence of errors found.
- Review at least 10% of completed and implemented SWP's; (Or Review a minimum of 50 SWP's where an Organisation prepares more than 500 SW'Ps per period).

Reviews of the SWP shall identify and assure whether the SWP:

- Produced was accurate, appropriate and within the timescales.
- Was verified and authorised as required prior to implementation;
- All relevant fields were completed accurately (including signatures).
- Was implemented as planned and any changes made were authorised as required
- Errors/amendments identified by the person in charge have been corrected prior to re-issue of the SWP.

Monitoring of safe system of work use

- Documented processes by which Senior managers (or other nominated equivalent accountable and responsible persons) monitor the level of work carried out under each level of the hierarchy of control for operational risk.

Records to support that the monitoring of the level of work carried out under each level of the hierarchy of control for operational risk. Has been implemented.

1.9 Design Management and Control

The auditor should establish that there are adequate controls in place to manage the design process within the Organisation (If applicable):

- That the Organisation can provide evidence of acting as designer and coordinating designs
- That the Organisation has arrangements in place for coordinating design in respect of CDM requirements (e.g. designing to meet Workplace Regs, consideration of future maintenance, coordination between design disciplines and passing information to subcontracted & specialist design teams).
- That the Organisation has a process to ensure design interfaces are thoroughly reviewed?
- There is a documented process for submission of designs (Including revision status, change process etc).
- Formal process to show how changes are communicated to the client and where applicable sub- contractors.
- That the Organisation have third-party reviews to ensure designs are correct?
- That the Organisation manages modifications after the design has been issued?

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:

- That the production of Health and Safety Risk Assessments is formally documented within the Organisation's Management Systems.
- Designated responsibility for compiling and authorising the risk assessments.
- Defined the minimum competency for personnel authorised to compile risk assessments
- Whether risk assessments are generic to the Organisation's scope of operations or unique to each particular contract.
- How the Organisation ensures that all applicable site issues are incorporated into the relevant 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 other Organisations/subcontractors.
- 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.
- 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.
- What programs does the supplier employ to reinforce safe behaviour and "re-educate unsafe behaviour" (Behavioural Safety)

2.2 Control of Substances Hazardous to Health

The Auditor shall verify how the Organisation ensures compliance with the Control of Substances Hazardous to Health (COSHH) Regulations:

- Has the Organisation identified any substances used that may fall within the scope of the COSHH Regulations?
- If the Organisation holds Manufacturers' Safety Data sheets for all substances used and stored on site.
- That the Organisation has undertaken formal COSHH assessments based upon the Manufacturers Safety Data sheets (Auditor to review the Organisation's Head Office and determine how this is discharged to project work).
- That COSHH Assessments have been briefed to all employees, organisations, subcontractors and the client as applicable.
- That records of COSHH assessment briefing are retained.

2.3 Implementation of Risk Controls

The Auditor shall verify that the Organisation's arrangements for implementing the risk mitigation control measures identified through the Risk Assessment process have been maintained:

- 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 are produced, risk assessments are incorporated or referenced. (Auditor should look at a sample of method statements to ensure that risk assessments have been referenced during the compilation of method statements.)

2.4 Personal Protective Equipment

The Auditor should establish the Organisations arrangements for the issuing, checking and monitoring of Personal Protective Equipment (PPE) (including Fall Arrest and Fall Prevention Equipment if applicable):

- That PPE is provided free of charge to own employees.
- The arrangements for issue at induction and following loss or damage.
- The arrangements for monitoring the use of PPE.
- PPE is appropriately used in the risk assessment processes
- All subcontractors working on associated projects have suitable controls in place for PPE.
- Auditor to establish the effectiveness of items of PPE by looking at sample issue lists.
- Compliance with LOLER and PUWER as appropriate.

(Sentinel 2.1)

The auditor shall verify that the Organisation has processes for, and records supporting, the issue and management of rail specific personal protective equipment (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.

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

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

- That the Organisation has a documented Work Safe Policy
- That records of briefing of the Work Safe Policy are available
- That the Work Safe Policy includes a cascade procedure in the event of conflict / disagreement
- That employees are not penalised for refusing to work on grounds of Health and Safety
- That where any refusals to work have occurred during the period since the last audit the Organisation has taken appropriate action in accordance with its policies and procedures.

2.6 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.

Auditor Note: Where an Organisation does not provide the welfare for their staff details of how the Organisation checks the adequacy of the welfare provided for their staff

2.7 Communication and Coordination

The supplier shall have maintained arrangements in place for Identifying and seeking co-operation from others who their works affect or whose work may affect them and adequately co-operating with

them to enable each party to discharge their duties under CDM 2015, the MHSWA Regs and any other relevant statutory duty. In particular these shall identify how the supplier engages with the wider construction team to coordinate delivery of their service in a way which, so far as reasonably practicable, ensures the health and safety of those carrying out the work and those who are affected by the work.

- Has the supplier maintained 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).
- Has the supplier maintained processes in place for the validation and checking of their suppliers Method Statements, RAMS, Work Package Plans and Task Briefings (as applicable).

(SWP 2.1)

The auditor will verify that the Organisation has processes for communication and co-ordination within any worksite. These processes shall be fully documented and include the following:

- Accident / incident reporting arrangements which are consistent with the PC's arrangements, where appropriate
- Emergency planning / contingency planning arrangements which are consistent with the PC's arrangements, where appropriate
- Arrangements for assessing information on risks
- Identifying when the site of work forms part of a group of sites of work where protection arrangements must be coordinated
- Coordinating all activities to manage interface risks and any common controls (e.g. Emergency Plan, Isolation Plan and Access Plan etc.)
- Ensuring that each Organisation responsible for an activity taking place in the site of work cooperates in the planning and delivery of work with others in order to identify and control the risks arising from the interface between their activities.
- Ensuring that those Organisations responsible for each activity within the site of work are aware of any change during the planning process and any additional management responsibilities they may have in the event of change.
- Ensuring that all Organisations who implement the plan are made aware of the outcomes from the coordination process.
- Communicating the plan before the date of execution to the person in charge of work, the PC and any other relevant bodies that affect the plan such as those taking isolations and those working within a worksite protected by the plan.
- When working under a PC or Network Rail, Organisations must have arrangements for communicating with either the PC or Network Rail, including a nominated contact and a template for communication plans. Organisations must also share key performance data with PC's or Network Rail such as the percentage of re-planned work.

3. Environmental Management

3.1 Environmental Risk

The Auditor should establish whether the Organisation has produced Environmental Aspects and Impacts (i.e. Environmental risk assessments) appropriate to the scope of its activities:

- That the supplier has implemented / maintained controls to manage Environmental legislative requirements appropriate to the scope of its activities
- That competent and authorised personnel have assessed the Environmental Aspects and Impacts associated with the scope of its works.
- How has the Organisation ensured issues such as environmental noise and restrictions on working hours are managed?
- How have Environmental risk assessments been communicated to staff, clients and the Organisation's subcontractors.
- Has the Organisation retained those records of briefing?
- What evidence is available to support that the Organisation has implemented processes for periodic reviews of environmental risk assessments and the other types of information the Organisation receives that may initiate a review of the Environmental risk assessments and associated processes and potential issues.

4. Management of Accidents and Incidents

4.1 Accident and Incident Reporting and Investigation

The Auditor shall verify that the Organisation's arrangements for the investigating and reporting of all accidents, incidents, near misses and close calls have been implemented / maintained as applicable:

- 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)?
- Has the Organisation maintained records of accidents, incidents, near misses and close calls (This includes Safety and Environmental incidents)?
- The Organisation has communicated the accident reporting process to its workforce and where applicable sub-contractors.
- That, where applicable, the Organisation has implemented a documented process for undertaking local and formal 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).
- Has the Organisation produced and analyse Accident and Incident Statistics?
- Has the Organisation produced annual reports detailing Accidents, Incidents, Close Calls and Dangerous Occurrences Statistics?
- Are these reports available? Are these reports available to all levels of the Organisation?

4.2 Emergency and Contingency Planning

The auditor shall verify that the Organisation has arrangements in place for responding to emergencies while undertaking work on rail infrastructure. These arrangements shall include:

- The preparation and distribution of emergency response plans to its own personnel and suppliers and other affected parties.
- Production and distribution of an emergency contact list.
- Provision of equipment for use in the event of an emergency
- Provision of competent personnel e.g. First Aid trained staff, On call staff with appropriate training
- Briefing workers on the plans and testing the effectiveness of such plans.
- Interfacing with, and assisting, Principal Contractors, Network Rail, Transport for London, Regulatory Authorities, and the Emergency Services, etc.
- Review and revision of the plans, particularly after an accident/incident or an emergency.

Auditor note: *where the emergency and contingency planning is the responsibility of another party the auditor shall verify how the supplier communicates and reviews applicable arrangements

(SWP 3.1)

The auditor shall verify that the Organisation has in place adequate arrangements for contingency and emergency planning that recognise the additional elements that this form of planning requires.

These arrangements shall be fully documented and include:

- Risk based controls according to the complexity of the task
- Coordination and cooperation with the Principal Contractor in the preparation and distribution of contingency and emergency plans
- Briefing arrangements
- Testing of effectiveness and understanding
- Production and distribution of Emergency contact details
- Provision of equipment to be used in the event of an emergency

- Interfacing with, and supporting, the Principal Contractor, Network Rail, Regulatory Authorities and the Emergency Services
- Periodic and/or post incident review and revision of processes where necessary
- Communication and Investigation of breaches of safe system of work planning arrangements
- Accident / Incident Reporting Arrangements
- Emergency Planning / Contingency Planning Arrangements
- Assessment of risk information
- Coordination of Protection Arrangements
- Coordination of activities within the contingency & emergency plans
- Communication with person in charge of work, the Principal Contractor and other relevant bodies
- Sharing of Performance Data

4.3 Restoration of Service (Business Continuity)

What are 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?

5. Supply Chain Management

5.1 Supplier and Subcontractor Management

The Auditor should establish how the Organisation has ensured effective supplier and sub-contractor management:

- Has the Organisation maintained control its supply chain approval process?
- Has the Organisation's supply chain register been maintained up to date with relevant information e.g. any licenses or trade association memberships etc. held by their supply chains?
- 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 have been implemented by the Organisation to manage sublet work/design packages with Organisations that are based overseas and that they are able to meet UK regulatory requirements (if applicable)?
- What approval mechanisms have been implemented by the Organisation prior to placing a contract for works with an approved supply chain member?
- Has the Organisation identified the minimum levels of insurance applicable and required to be held by its supply chain?
- What assurance processes (i.e. First party, Second party, Third party audits; Site Inspections; End product checks etc.) has the Organisation undertaken on its supply chain and is reports / results available?
- Can the Organisation demonstrate that where issues / non-conformance has been recorded that theses have been monitored / tracked to ensure timely closeout or for instances where the issues remain open the Organisation is aware of the outstanding issues and what actions (where applicable) have been taken to ensure that potential risks have been mitigated?
- Can the Organisation demonstrate evidence that supply chain performance has been reviewed (i.e. post contract reviews, periodic management reviews) and how are the results of these reviews has been communicated to relevant parties.
- Can the Organisation demonstrate evidence of the implementation of processes 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

(SWP 5.1)

The auditor shall verify that the Organisation has arrangements in place for assuring the competence of their employees and hired-in staff involved in the planning process. These arrangements shall be fully documented and are to include:

- A suitable process for recruiting planners and staff controlling the works (e.g. SPC, SWL) that includes consideration of sufficient experience, skills, knowledge and qualifications.

5.2 On-going Competence Management

The auditor shall verify that the Senior Manager Responsible for the development of safe systems of work and production of SWP is competent and experienced in setting policy and defining procedure and guidance for safe systems of work planning and the production of SWP activities. Where this role is sourced through an external provider, the Organisation shall have appointed a person with responsibility for coordination with the external provider.

The auditor shall verify that project specific Responsible Managers are appointed and are competent and experienced in managing the processes for development of safe systems of work and production of SWP.

The auditor shall verify that the Organisation has arrangements in place to ensure Responsible Managers are responsible for:

- Assigning safe systems of work planning activities to competent planners
- Adequate preparation of the plan by the nominated planner(s) and commissioning and validating of the plan
- Accepting and Rejecting plans
- Verifying that the specified levels of protection are appropriate to location and nature of work
- Nominated Safety Critical Roles
- Monitoring Performance Data including level of protection provided, and the number of plans rejected or changed on site

The auditor shall verify that the Organisation has appointed competent planners. The Organisation shall demonstrate that all planners meet the following criteria:

- Have been formally nominated, trained and assessed as competent in the delivery of safe systems of work planning activities and production of SWP and associated arrangements
- Have been formally assigned to develop and document plans and associated communication and coordination monitoring as directed by the Responsible Manager
- Have been provided access to appropriate and competent resources in relation to the delivery of safe systems of work planning activities including lift planning and adjacent line open working
- Has demonstrable arrangements for planners and staff controlling the works (e.g. SPC, SWL) to acquire and keep up to date local knowledge.
- Has a clear nomination process for assigning competent planners and staff controlling the works (e.g. SPC, SWL) to the delivery of safe systems of work planning activities.

The auditor shall verify that competence management arrangements include:

- A clear training and development process for planners and staff controlling the works (e.g. SPC, SWL) that includes processes for developing local knowledge, gaining access to required data, and acquiring any formal competencies which are required.
- Ensuring that the Responsible Manager is provided with sufficient training in the planning provider's management system to effectively execute their responsibilities.
- Employees and supplier's staff have their rail related competencies maintained and developed (e.g. in line with industry changes and technological developments).
- Providing adequate and appropriate training including an assessment of competence for planners and staff controlling the works (e.g. SPC, SWL) , resulting in an Authority to Work to carry out the role.
- That planners and staff controlling the works (e.g. SPC, SWL) who are being trained are adequately supervised and do not undertake tasks they are not yet trained and assessed in
- Maintaining relevant knowledge and understanding of the rule book and industry processes associated with the production of safe systems of work planning SWP.
- Suitable arrangements for providing and signing off an Authority to Work for employees and supplier's staff. This could include the issue of an Authority to Work card detailing the specific assigned duties relating to safe systems of work planning activities.

- Ensuring the provision of training, guidance and mentoring of those who conduct briefings of the plan to the site team.

6. Competence Management

6.1 Recruitment and Induction

The Auditor should establish the Organisation's policy on and 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). (TfL requirement)
- 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)? (TfL requirement)
- 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.

6.2 On-going Competence Management

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

- Evidence that current personnel have experience with that workload (for multi-disciplinary Organisations)
- Has the means of identifying certification expiry/re-training event dates and also where necessary competency assessment events due dates been maintained up to date.
- Has the Organisation continued to identify and meet industry/client-specific competence/training requirements? (e.g. Sentinel Sponsorship)
- The Organisation, if providing trailers and attachments with wheels, must ensure relevant staff understand the requirements of M&EE COP0014.
- Has the Organisation continued to determine which roles / tasks / activities are deemed to be 'Safety Critical?' (TfL requirement)
- Have those employees carrying out safety critical work been identified (e.g. training matrix) (TfL requirement)
- Does the list of safety critical workers correlate with the relevant infrastructure owner's safety critical workers data (e.g. TfL SCL database)? (TfL requirement)
- Has the Organisation issued Safety Critical Work Identification Cards? (minimum details Name of Holder, Photograph, Name and address of employing Organisation) (TfL requirement)
- Are protection staff deployed according to their skills, certification and licensing levels? (how does the Organisation ensure that staff carrying out protection activities, are familiar with the areas in which they are set to work; Site familiarisation matrix, evidence of familiarisation, identification of 'Complex' and 'Basic' areas, number of visits to locations, date of last visit to location, (TfL requirement)
- Have protection staff no longer performing protection activities been managed in accordance with the Organisation's procedures? (TfL requirement)
- Has the Organisation ensured that staff (including contractors) are issued with the correct certification required e.g. Industry Common Induction (ICI) with LU endorsement, Fire Training, DAMPS and Track Safety Training when attending site. (TfL requirement)
- Has assessment / verification of training been carried out by suitably competent / approved personnel? (e.g. Sentinel registered / NSARE approved training providers or TfL approved training providers / assessors)
- Have appraisals of personnel performance and personal training plans been implemented in accordance with the Organisation's procedures?

- Where the Institute of Rail Signalling Engineers (IRSE) is used by the Organisation have documented procedures for the management of IRSE licensing requirement been maintained?
- Where the IRSE is not used, has the Organisation ensured the competence of signalling personnel?
- Have processes for the mentoring and development of personnel deemed “not yet competent” been implemented / maintained in accordance with the Organisation’s procedures?
- Have processes for the mentoring, development and re-training of personnel following an accident or who are unfamiliar with an area been implemented / maintained in accordance with the Organisation’s procedures? (TfL requirement)
- Can the Organisation demonstrate that competency management records support the management system presented (in line with mandated sampling regime)?
- Can the Organisation demonstrate that nominated competent personnel have been appointed with responsibility for the relevant engineering streams e.g. Professional Head?
- Has the Organisation implemented / maintained its processes for the nomination of key staff for projects
- For alumino-thermic welding competencies can the Organisation demonstrate that trainer/assessors (or trainer/assessor companies) used are approved in the respective processes by Railtech UK and/or Thermit GB Ltd?
- Note – Suppliers providing arc-welding services require final Network Rail approval prior to the supplier being considered for arc-welding services on Network Rail Managed Infrastructure (NRMI).
- Note – For Flash Butt Welding suppliers must hold Network Rail Product Acceptance for services on NRMI.

7. Plant & Equipment

7.1 Management, Maintenance and Servicing

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

- Does the Organisation have a process to identify each item of plant or machinery?
- For suppliers providing On-track plant the Organisation must have an up to date inventory of all items of OTP and rail trailers/attachments it operates.
- What are the Organisation's arrangements to ensure that all plant, small hand tools and equipment are approved prior to use?
- If the Organisation uses equipment from a third party, how does it assure itself that the equipment is fit for purpose?
- 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, Local Exhaust Ventilation? (LEV)
- Do maintenance and service procedures identify quarantine arrangements to ensure equipment that is not fit for purpose cannot be used?
- If lifting equipment and its ancillary (chains/ slings/ strops) equipment are used, does the Organisation possess processes to ensure they remain safe (if applicable)?
- The competence requirements for internal staff involved in maintenance, inspections and servicing of equipment.
- That maintenance work plans are signed by a competent person.
- How are calibration requirements controlled (if applicable)
- Auditor note: Specific check of calibration records for CRIDs is to be carried out (TfL Requirement)

Where applicable does the Organisation (if supplying OTP) understand the requirements of Product and Engineering Acceptance/Conformance Certificate (EAC/ECC)?

- The Auditor will establish the auditees understanding by being able to provide the following:
- The principles of vehicle acceptance or steps to be taken regarding modifications to the machines against a current copy of the relevant standard
- Internet access is acceptable for the above document
- The need for an EA/EC certificate and how it is obtained
- The role of the Plant Acceptance Bodies (PAB).
- Changes / Modifications
- The purpose of the accredited Maintenance Plan
- The need for the Engineer to review the Maintenance Plan against EA/EC and resubmit it for scrutiny if required
- The Organisation must have Engineering Conformance Documentation issued by an approved PAB for all items of OTP and rail trailers it operates.
- The Organisation must have infrastructure specific Product Acceptance where applicable
- For on-track machinery providers the Auditor will carry out a sample review of the maintenance plan / vehicle maintenance instruction documentation, to establish accreditation is correct and valid.
- The Organisation must ensure maintenance / service check sheets are in place for all machines, trailers and attachments, along with an annual maintenance programme indicating when next planned maintenance is due.
- The Organisation must retain records of completed maintenance/service check sheets for all machines, trailers and attachments.
 - The Organisation must ensure that arrangements are in place for the implementation of 'Pre-Delivery Inspection' (Fitter) and 'Pre-start' checks (Operator) and that these are formally recorded.
- Where applicable does the Organisation have a documented process for the reporting of high risk / safety related defects?

(SWP 6.1)

The auditor shall verify that the Organisation has arrangements in place to ensure:

- That all relevant equipment is provided to execute the plan, including equipment to verify sentinel cards, isolation equipment and possession management equipment.
- That all On Track Plant (OTP) is provided by a POS provider, and is under the site control of the nominated POS Representative identified in the plan.
- That the POS provider has assisted and agreed to the OTP plan, and this is integrated into the processes for the development of safe systems of work and production of Safe Work Packs (SWP).

8. Human Resources including Occupational Health Management

8.1 Occupational Health

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

- Are long-term health issues risk assessed?
- Does the Organisation undertake Alcohol and Drugs screening for personnel engaged in Safety Critical works?
- How does the Organisation manage fatigue?
- Do employees have pre-employment medicals before they start working for the Organisation?
- Has the Organisation carried out interviews of safety critical workers following periods of non-attendance? (e.g. Back to Work' policy / procedures) (TfL requirement)
- If personnel change roles are their Occupational Health requirements assessed prior to starting?
- Where applicable, has the Organisation implemented / maintained a program of routine health surveillance?
- What processes are in place to ensure that control measures remain appropriate to individual's condition/ requirements
- How as the supplier ensured that statutory/client requirements for regular surveillance have been met?
- How are results fed back to the Organisation?
- How often is the occupational health process reviewed? Is this review recorded?

Occupational Health Records

- Where does the Organisation store its occupational health information on employees?
- Do employees have the opportunity to review the Records kept regarding them if requested?
- Are records being retained in accordance with the Organisation's policy / procedures for records retention?

(Sentinel 3.4)

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.

8.2 Contract of Sponsorship Management

(Sentinel 3.1)

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;

- Undertaking checks of an individual's suitability to work on the relevant rail infrastructure prior to engaging in a contract of sponsorship.
- Provision and management of a valid Sentinel Card.
- 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
- 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).
- 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
- Defining the contractual relationship between the primary sponsor and individual and whether sub- sponsors are permitted.
- 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

8.3 Management of Sub Sponsors

(Sentinel 3.2)

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

- A mechanism 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. 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.

8.4 Misconduct Processes

(Sentinel 3.3)

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 conducting an investigation and misconduct hearing for that individual.

8.5 Alcohol and Drugs Management

(Sentinel 3.5)

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 drugs or alcohol, 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;

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.

8.6 Fatigue Management

(Sentinel 3.6)

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 (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**.

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.

Note **: This standard 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.