



## **RISQS Audit Protocol**

# **Industry Minimum Requirements, Sentinel, Safe Work Planning and Plant Operations Scheme modules**

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# 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

(IMR 1.1)

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

- Evidence of the current organisational structure identifying the key managerial posts i.e. safety, health, quality, environmental, technical, etc and their responsibilities for working within the relevant sector.
- Evidence that roles have defined job descriptions and that they 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 posts / roles'.
- That there are suitably qualified personnel for the services provided.
- If there are different structures on projects how they relate to the overall hierarchy of the organisation.

(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.

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(SWP 1.1)

#### SWP Roles and Responsibilities

The auditor shall verify that the Organisation has arrangements in place for, and records supporting the appointment of:

- A Senior Manager Responsible for Safe Work Planning (SWP)
- Manager(s) Responsible for Safe Work Planning (Responsible Manager)
- Safe Work Planner(s)
- Person in Charge

(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.

#### *POS Providers Responsible roles – (POS 1.2)*

The POS provider shall have appointed suitable personnel to undertake key roles.

#### *On-Track Plant Operations (OTP) (POS 1.2.1)*

POS providers shall nominate a person to be responsible for OTP and the continued competence of all individuals involved in the work.

The person fulfilling this role shall be:

- Competent in managing the planning, operation and maintenance of OTP operations; and
- Responsible for assigning competent OTP Personnel including POS Representatives.

#### *On-Track Plant Engineering (POS 1.2.2)*

POS providers shall nominate a person to be responsible for OTP engineering and the continued competence of all individuals involved in the work.

The person fulfilling this role shall;

- Be competent in the design, manufacture, maintenance and engineering change aspects of OTP engineering.

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- Have been trained and assessed as competent in the use of the safety systems used on items of OTP that are owned directly by their employing Organisation or might be used in OTP operations within the POS provider's scope of work; and
- Be responsible for the product approval and engineering acceptance of OTP including engineering change.
- Where this role is sourced from an external Organisation, the POS provider shall identify a person within their Organisation to be responsible for liaising with the external Organisation.

*On-Track Plant Operations Scheme Representative (POS 1.2.3)*

POS Provider's shall nominate at least one POS representative on each site where OTP is being utilised.

This post will be referred to as the POS Representative and the person(s) fulfilling this role shall be:

- Formally nominated, fully trained, and assessed as competent in the POS provider's management systems for delivery of the OTP plan and arrangements.
- The single point of contact for the Person in Charge for OTP operations
- Assist in the planning of OTP operations and the documenting of these in the OTP Plan.
- A direct employee of the POS provider.
- A POS representative shall not be engaged in, or be responsible for any other site safety critical duties except as a machine controller (MC) or a crane controller (CC), when only a single item of OTP is in use and they hold the corresponding competence.

*POS Provider's Organisation Control / Management (POS 1.1)*

A POS provider shall have a management system and framework for the safe delivery of OTP operations.

A POS provider shall have arrangements in place to:

- Document the Organisational structure to demonstrate that it is adequate for OTP operations and planning.
- Keep the Organisational structure current.
- Obtain the acceptance of responsibilities from all post holders.
- Set up a means of communication with suppliers where key Safety, Health Environmental, Quality or technical expertise is procured from outside the Organisation.
- Demonstrate their understanding of the roles and responsibilities of a Principal Contractor (PC) in relation to the POS provider.

Risk assess, validate and brief out material changes to the management system. Proposed material changes are to be notified to the POS Administrator (Network Rail POS Review Panel) in sufficient time for review and approval prior to the material changes being implemented.

## **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 that:

- hold a minimum qualification of NEBOSH general certificate or equivalent.
- they 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**

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(IMR 1.3)

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 Safety, Health 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, TfL QUENSH).
- Where an Organisation undertakes safety critical activities on TfL infrastructure they have access to and understand the requirements of TfL Document G0421 (Management and competency requirements of those that carry out protection activities).

(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 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)

## 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.

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- 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 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

*(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.

## 1.5 Management Systems

*(IMR 1.5)*

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



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- That preferably the Organisation should have an 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 a documented management system, appropriate to the scope of services, that meets all the quality, environmental and safety requirements detailed within this document

Auditor Note: The latest 3rd party surveillance reports are to be reviewed and where non-conformances were identified the auditor should review the actions planned and undertaken to close these.

- Where applicable the Organisation must have documented procedures that cover key issues relating to the hire out/supply/maintenance of On-track Plant (OTP).
  - 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

(IMR 1.6)

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).

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(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 SWPs where an Organisation prepares more than 500 SWPs 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).

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- 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

(IMR 1.7)

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:

- 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 auditor shall identify how the Organisation controls the issue of documentation (e.g. TfL Log Books, Rule Books, company documentation) to staff and perform a sample check of the records of issue.
  - Whether a master list of controlled documents and their status is maintained.
- The Auditor shall establish that there is a robust system in place, where applicable, to ensure that the following documentation is provided for items of plant (all OTP should be checked and a sample of other plant items):
  - Engineering Acceptance/Conformance (all pages) and endorsements (where required)
  - Network Rail product acceptance or letter of exemption
  - Record of thorough Examinations
  - Load radius charts (where machines are fitted with Rated Capacity Indicators (RCI's))

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- Log book/operator inspection report book
- Brake test certificate
- For Machine specific documentation has the Organisation nominated a responsible manager / individual?

(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.

## 1.8 Monitoring

(IMR 1.8)

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 1.6)

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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 SWPs 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.

*(POS 1.3)*

The auditor shall verify that the POS provider shall have arrangements in place for the proactive and reactive monitoring of their own performance and that of their suppliers.

These arrangements shall be fully documented and include:

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- Obtaining and collating their own and their supplier's monitoring data, e.g. site inspection reports, audits, accident reports, etc.
- Analysing and reviewing performance data and other key performance indicators (KPIs), including OTP reliability and the identification of trends.
- Conducting a management review (at least annually) of the POS provider's processes and arrangements
- Obtaining and reviewing the results of their supplier's Railway Industry Supplier Qualification Scheme (RISQS) product codes and technical audits.
- Reviewing and discussing supplier performance with their suppliers.
- Identifying and closing out corrective actions and concessions in a timely manner.

## 1.9 Design Management and Control

(IMR 1.9)

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

- The Organisation can provide evidence of acting as designer and coordinating designs
- What arrangements are 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).
- How does the Organisation 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.
- Does the Organisation have third-party review to ensure designs are correct?
- How does the Organisation manage modifications after the design has been issued?

## 2. Safety Risk Management

### 2.1 Health and Safety Risk Controls

(IMR 2.1)

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

(IMR 2.2)

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

(IMR 2.3)

The Auditor shall verify 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 are produced, risk assessments are incorporated or referenced.

Auditor Note: A sample of method statements shall be reviewed to ensure that risk assessments have been referenced during the compilation of method statements and that they are relevant to the works being undertaken.

## 2.4 Personal Protective Equipment

(IMR 2.4)

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)

(IMR 2.5)

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

- That the Organisation has a documented Work Safe Policy
- That records of briefing of the Work Safe Policy are available

Industry Minimum Requirements, Sentinel, Safe Work Planning and Plant Operations Scheme modules

- 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

## 2.6 Welfare Arrangements

(IMR 2.6)

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

(IMR 2.7)

The supplier shall have 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 MHSAW 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.

- The supplier should have processes in place for the controlled issue of such as; Method Statements, Risk Assessments, 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 contractors Method Statements, Risk Assessments, 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.

## Industry Minimum Requirements, Sentinel, Safe Work Planning and Plant Operations Scheme modules

- 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 PCs or Network Rail such as the percentage of re-planned work.

### *(POS 2.1)*

The auditor shall verify that the POS can demonstrate their controlled processes for communication and co-ordination within possessions and worksites.

These arrangements shall be fully documented and include:

- A POS representative acting as the single point of contact during OTP activities.
- Accident / incident reporting arrangements. Including directly reporting accidents or incidents to NIR- online.
- Emergency and contingency planning arrangements.
- Arrangements for assessing information on risks etc. provided by the Principal Contractor and from the POS provider's own site walk out and the incorporation of any resulting information into the OTP Plan and Method Statement
- Demonstrating that essential communication and / liaison between all those involved in the work takes place as planned.
- Where the POS provider is also undertaking the role of the PC, the representatives of the POS provider and the PC shall be separate; this being to ensure the integrity of both duties is maintained.

## 3. Environmental Management

### 3.1 Environmental Risk

(IMR 3.1)

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 identified 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.
- That Environmental Risk Management Processes are formally documented within the Organisation's Management Systems.
- How does the Organisation ensure issues such as environmental noise and restrictions on working hours are managed?
- Responsibility and competency for compiling and authorising environmental risk assessments.
- Whether risk assessments are generic to the Organisations scope of operations or unique to each specific contract.
- How Environmental risk assessments are communicated to staff, clients and the Organisations' sub-contractors.
- How those records of briefing are retained by the Organisation.
- 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.

## 4. Management of Accidents and Incidents

### 4.1 Accident and Incident Reporting and Investigation

(IMR 4.1)

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)?
- The Organisation has communicated the accident reporting process to its workforce and where applicable to its sub-contractors.
- That the Organisation has 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).
- Does the Organisation produce and analyse Accident and Incident Statistics?
- Does the Organisation produce 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

(IMR 4.2)

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:

## Industry Minimum Requirements, Sentinel, Safe Work Planning and Plant Operations Scheme modules

- 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)

(IMR 4.3)

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

(IMR 5.1)

The Auditor should establish how the Organisation ensures effective supplier and subcontractor management:

- How does the Organisation control its supply chain approval process?
- How does the Organisation assess the historical competence of its supply chain and their ability to meet designated functions under UK Legislation?
- Has the Organisation identified the relevant licences and trade associations that the supply chain should be members of dependent upon the scope of service offered?
- Does the Organisation's supply chain register identify any licences or trade association memberships 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 does the Organisation have in place 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 mechanism the Organisation has in place 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?
- 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 post contract reviews of supply chain performance and how are the results of these reviews communicated.
- 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 take into account 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.
- .

(POS 3.1)

POS providers shall have arrangements in place for the selection and use of suitable suppliers, including Safety Critical goods, products or services. These arrangements are to be fully documented and shall include:

- OTP used on rail related contracts shall only be hired in from approved suppliers that have in place the necessary RISQS auditable product code.

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- All hired in OTP and attachments used on rail related contracts are to be Network Rail approved and have a valid certificate of Engineering Acceptance (where applicable).
- Where a POS provider hires in additional resources such as OTP or personnel they shall be subject to the same arrangements for the planning of OTP operations as their own and shall be documented in the OTP Plan under the responsibility of the POS Representative.
- Where a POS provider hires in supporting services e.g. mobile cranes, general construction plant, etc., they shall be subject to the same arrangements for the planning of OTP operations and shall be documented in the OTP Plan under the responsibility of the POS Representative.
- Hired in supporting services and goods utilised on rail related contracts are fit for purpose and are properly maintained, in a serviceable condition that meets the required standard of performance and reliability accepted by Network Rail.

All hired in plant, equipment and attachments will only be operated by competent personnel.



## 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.

## Industry Minimum Requirements, Sentinel, Safe Work Planning and Plant Operations Scheme modules

- 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

(IMR 6.1)

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.

(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 SWLs that includes consideration of sufficient experience, skills, knowledge and qualifications.

### 6.2 On-going Competence Management

(IMR 6.2)

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

- How does the Organisation identify competence requirements for particular activity?
- Evidence of identifying and meeting statutory competence requirements as distinct from client-specific competencies.
- Evidence that current personnel have experience with that workload (for multi -disciplinary organisations)
- How does the Organisation record what training or levels of competency required for the position?
- Has the Organisation a process for certification expiry/re-training event dates.
- 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 record what training or levels of competency are needed for the position?
- That the Organisation has a means of identifying certification expiry/re-training event dates and also where necessary competency assessment events due dates.
- How does the Organisation identify and meet industry/client-specific competence/ training requirements? (e.g. Sentinel Sponsorship)

## Industry Minimum Requirements, Sentinel, Safe Work Planning and Plant Operations Scheme modules

- The Organisation, if providing rail trailers and attachments with wheels, must ensure relevant staff understand the requirements of M&EE COP0014.
- Has the Organisation determined and documented 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)
- Does the Organisation issue 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 site familiarisation, identification of 'Complex' and 'Basic' areas, number of visits to locations, date of last visit to a location) (TfL requirement)
- What procedures do the Organisation have in place for managing protection staff no longer performing protection activities? (TfL requirement)
- 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, Drugs Alcohol Medical Screening Programme (DAMSP) and Track Safety Training when attending site. (TfL requirement)

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)

- Have the relevant competency standards been documented; these may be drawn from external organisations
- Where competency standards have been developed internally these must be signed off by competent personnel
- How are remote workers advised of their need to be re-assessed? (if applicable)
- Are there appraisals of personnel performance and personal training plans put in place?
- With respect to signalling, does the Organisation have documented process in place for complying with the Institute of Rail Signalling Engineers (IRSE) Licensing Scheme?
- In relation to signalling services (if applicable) does the Organisation use IRSE licensing?
- Where IRSE is used does the organisation have documented procedures for the management of IRSE licensing requirement?
- Where the IRSE is not used, how does the Organisation ensure the competence of signalling personnel?
- Does the Organisation have a process in place for the mentoring and development of personnel deemed "not yet competent"?
- Does the Organisation have a process for the mentoring, development and re-training of personnel following an accident or who are unfamiliar with an area? (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?
- Processes for the nomination of key staff for projects

Where the Organisation provided rail welding services:

- 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?
- Auditor 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).

## Industry Minimum Requirements, Sentinel, Safe Work Planning and Plant Operations Scheme modules

- Auditor note: For Flash Butt Welding suppliers must hold Network Rail Product Acceptance for services on NRMI.

### (POS 4.1)

A POS provider shall have arrangements in place for assuring the competence and fitness of their employees and hired-in staff involved in the operation and maintenance of OTP.

These arrangements shall be fully documented and are to include:

#### 4.1.1 Competence:

- Determining the specific competence requirements for OTP personnel including maintainers and logistics staff.
- Specific training for the POS Representative including an assessment of competence.
- Selection of new OTP personnel including maintainers.
- Provision of training on the operation and maintenance of OTP.
- Training and briefing on the risks associated with OTP.
- Training and briefing on avoiding points run through and incident awareness.
- Re-assessing competence periodically and retraining following identification of poor performance.
- Awareness of behaviour based safety for OTP personnel.

#### 4.1.2 Managing directly employed personnel:

- Checking of depots and sites.
- Booking-on procedures.
- Monitoring of fitness and fatigue.
- Managing notice boards / late notice cases (where applicable).
- Distribution of operational information and briefings.

#### 4.1.3 Managing hired in personnel:

- Assuring competence.
- Assuring fitness and monitoring fatigue.
- Monitoring performance.
- Sharing performance data.

#### 4.1.4 Monitoring performance of OTP personnel:

- Compliance with operational arrangements.
- Booking on arrangements.
- Plant preparation.
- Machine operating techniques.
- Movement speeds of OTP.
- Taking action when non-compliance is identified.
- Frequency of monitoring.
- Posts responsible for monitoring.

#### 4.1.5 Special monitoring of OTP personnel that are either newly qualified or poorly performing:

- Criteria for instigating special monitoring.
- Additional monitoring to be carried out.
- Additional controls that may be required.
- Criteria for ending any special monitoring

## 7. Plant & Equipment

### 7.1 Management, Maintenance and Servicing

(IMR 7.1)

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 with regard to 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.

Industry Minimum Requirements, Sentinel, Safe Work Planning and Plant Operations Scheme modules

- 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).

## 7.2 On-Track Plant (Scope of Operation)

(POS 5.1)

POS providers shall have a documented system that identifies the following:

- Number of items of OTP operated per week.
- Types and number of OTP owned, including their date of introduction.
- Types and number of OTP hired.
- Number of possessions operated per year.
- Number of OTP operating hours per year.
- Details of all maintenance facilities.
- Details of all accidents and close calls in the last 12 months.

## 7.3 OTP Acceptance and Maintenance

(POS 5.2)

A POS provider shall have arrangements / processes in place for the approval, acceptance and maintenance of OTP. These arrangements shall be fully documented and are to include the following:

- Network Rail product approval, or approval exemption.
- Engineering acceptance of OTP.
- A process for managing engineering Change following OTP modification or upgrade.
- Development and implementation of maintenance instructions for each type of OTP.
- Provision of suitable and sufficient maintenance facilities.
- Control of maintenance periodicity.
- Monitoring and reporting of maintenance performance.
- The regular review of maintenance instructions and a process for amending or updating maintenance instructions.
- Maintenance of Safety Critical systems (e.g. RCI calibration).
- Implementation of these requirements for hired in OTP through assurance and monitoring.

Maintaining an up to date register of all OTP subject to these arrangements

## 7.4 OTP Reliability

(POS 5.3)

A POS provider shall have arrangements in place for monitoring the reliability of OTP. These arrangements shall be fully documented and are to include:

- A reporting system in use to report faults accurately and in a timely way.
- A reliability improvement plan to detail proactive efforts in overcoming reliability issues and show any actions planned or taken to overcome OTP reliability issues.
- Analysis of reliability data collected to support continuous improvement against performance criteria.
- Actions taken to minimise damage during transit to ensure OTP remains fit for purpose prior to the start of work.
- Actions taken to ensure that all attachments supplied are properly cared for when not in use, providing additional safe/clean stowage where necessary.
- An assessment as to whether there is a need for an on-site fitter available throughout the work and the provision of a contingency spares/tools pack of commonly used items.



## 8. Human Resources including Occupational Health Management

### 8.1 Occupational Health

(IMR 8.1)

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.

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- 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.

*(POS 6.1)*

The auditor shall verify that the POS provider has a process in place to ensure that when an alleged breach of the POS rules is received the POS provider commences a Local Investigation. The Local Investigation must be suitably independent to ensure that it also considers system and management failures as part of the investigation report. Following completion of the Local Investigation, the POS must identify the improvements or remedial actions they will undertake to prevent a reoccurrence.

### 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:

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- 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.

## 9. Operational Arrangements and Requirements

### 9.1 Operational Arrangements and Requirements

(POS 7.1)

A POS provider shall have arrangements in place for implementing operational requirements. These arrangements are to be fully documented and shall include:

#### 7.1.1 Operational Control:

- Communications processes.
- Exchange of information with Network Rail regarding diversions, speed restrictions, late notices and infrastructure failures.
- Interface with Network Rail's National Control regarding Urgent Operating Advice (RIS – 3350 - TOM) and Defect Reports (RIS -8250-RST) and (NR/PLANT/0200/module P100).
- Communicating conditions of low rail adhesion (RIS –8040 -TOM).

#### 7.1.2 Planning:

- Involvement in possession planning including input to; method statements and work package plans.
- Advising on the selection of the OTP for the work to be carried out.
- Selecting and controlling OTP personnel
- Attending pre-possession meetings.
- Attending site walkouts.
- Involvement in the selection and use of competent lift planners to plan lifting operations.

#### 7.1.3 Control and supervision of OTP:

- Pre-use checks
- Setting up of OTP
- OTP movements (as required by Rule Book Module GE/RT8000 – HB15)
- Reports of OTP faults or defects.
- Exclusion zones and Duplex communications

### 9.2 On-Track Plant Planning

(POS 7.2)

POS providers should assist in the development of an OTP Plan that includes all information relevant to the safe operation of the OTP. The auditor shall ensure that the Organisation has processes in place to ensure that documented OTP Plans will comply with NR/PLANT/0200 and include the following information as a minimum.

- Description of work to be undertaken and the use that will be made of the plant.
- Safe system for operations affecting any adjacent line open (ALO), overhead line equipment (OLE) or third and fourth rail areas including third party owned OLE.

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- Limitations and obstructions to space and clearance such as gauge restrictions, bridges, platforms, buried cables and troughing etc.
- Identification of road-rail access point (RRAP) locations for on/off/cross tracking of OTP.
- The transportation of OTP to/from the site access point
- Worksite details and the movements involved, including to/from the worksite.
- Details of where different modes of operation are to be undertaken.
- Site briefing arrangements and responsibilities.
- Information and the emergency plan applicable including contacts and recovery arrangements.
- Storage/stabling locations including security requirements on site.
- Communications including Duplex communications equipment.
- Arrangements for traffic management planning / cooperation including exclusion zones and safe movement of personnel and OTP from the delivery point and throughout the site of work.
- Contingency planning arrangements in place for preventing the operation of defective OTP performing a Safety Critical function.

### 9.3 Transfer of POS provider approval

(POS 7.3)

Note: This question to be applied in cases where a POS provider is to be / has been acquired by another company or group.

The auditor shall establish that due process has been followed, including as a minimum.

- The POS Review Panel had been notified in advance of the acquisition.
- The acquiring Organisation had produced a material change report to detail how the POS processes will be merged and the POS provider's approval transferred in practice.
- Evidence that the POS Review Panel had reviewed the material change report to determine if the POS provider approval can be transferred to the acquiring Organisation