

(IMR-SEN Condensed - 5 Star Qualified Organisations).



RISQS Audit Protocol

Industry Minimum Requirements and Sentinel, modules

(IMR Condensed - 5 Star Qualified Organisations).

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Preface

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

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

Guidance Notes

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

Assessment Requirements

1. Management Control

1.1 Management Structure

(IMR 1.1)

Note: This IMR question is only to be applied where there have been changes to the structure of the Organisation, in which case change validation processes should have been applied; or where the persons holding key roles have changed during the period since the previous audit.

Auditor Note: The Auditor shall verify the change validation process has been applied and is documented by the Organisation.

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.

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).

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

(IMR 1.5)

Note: This IMR question is only to be applied to documents that have been changed / amended during the period since the previous audit.

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)

1.6 Policy Control - "IMR element exempt - 5 Star Qualification"

(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).

1.7 Document Control

(IMR 1.7)

[Note: This IMR question is only to be applied to documents that have been changed / amended during the period since the previous audit].

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 - "IMR element exempt - 5 Star Qualification"

1.8 Design Management and Control - "Question Exempt - 5 Star Qualification"

1.9 Design Management and Control - "Question Exempt - 5 Star Qualification"

2. Safety Risk Management

2.1 Health and Safety Risk Controls - "Question Exempt - 5 Star Qualification"

2.2 Control of Substances Hazardous to Health - "Question Exempt - 5 Star Qualification"

2.3 Implementation of Risk Controls

(IMR 2.3)

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 - "IMR element exempt - 5 Star Qualification"

(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 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 - "Question Exempt - 5 Star Qualification"

2.7 Communication and Coordination

(IMR 2.7)

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 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.

- 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).

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 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

(IMR 4.1)

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 - "Question exempt - 5 Star Qualification"

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 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

6. Competence Management

6.1 Recruitment and Induction “Question exempt - 5 Star Qualification”

6.2 On-going Competence Management

(IMR 6.2)

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 event 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

(IMR 7.1)

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

- Has the Organisation maintained its processes to identify each item of plant or machinery?
 - Organisation's providing On-track plant must have an up to date inventory of all Road Rail vehicles (RRV), Rail Mounted Maintenance Machines (RMMM), and rail trailers/attachments it operates.
 - The Organisation must have Engineering Acceptance Documentation issued by an approved Vehicle Acceptance Body (VAB) for all RRVs, RMMMs and trailers it operates.
 - The Organisation must have infrastructure specific Product Acceptance where applicable
- Has the Organisation maintained arrangements to ensure that all plant, small hand tools and equipment are approved prior to use?
- Has the Organisation maintained equipment requiring calibration and / or testing (where applicable)
- Where the Organisation has used equipment from a third party, how has it assured itself that the equipment is fit for purpose?
- Has the Organisation maintained / implemented arrangements to identify and deliver statutory and other inspections/ service maintenance e.g. Vehicle mounted fire extinguishers, Lifting Accessories, Local Exhaust Ventilation? (LEV)
- Has the Organisation maintained / implemented quarantine arrangements to ensure equipment that is not fit for purpose cannot be used?
- Where lifting equipment, appliances and accessories (chains/ slings/ straps) are used, has the Organisation implemented / maintained processes to ensure they remain safe (if applicable)?
- Has the Organisation implemented / maintained the competence requirements for internal staff involved in maintenance, inspections and servicing of equipment.
- That maintenance work plans are signed by a competent person.
- Where supplying Possession only Rail Vehicles does the Organisation continues to demonstrate an understanding of the requirements of Product and Engineering Acceptance (EA)? e.g.
 - The principles of vehicle acceptance or steps to be taken with regard to changes and modifications to the machines against a current copy of the relevant standards
 - Internet access is acceptable for the above document
 - The need for an EA certificate and how it is obtained
 - The role of the VAB
 - The purpose of the accredited Maintenance Plan and the need for the Engineer to review the Maintenance Plan against EA and resubmit it for scrutiny if required.
- 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 program indicating when next planned maintenance is due.

- Has the Organisation retained records of completed maintenance/service check sheets for all machines, trailers and attachments.
 - Has the Organisation ensured that arrangements have been implemented of 'Pre-Delivery Inspection' (Fitter) and 'Pre-start' checks (Operator) and that these have been formally recorded.
- Where applicable, the Organisation has documented and reported high risk / safety related defects?

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.

- 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.