

# RISQS Audit Protocol

## NON-TRACKSIDE SENTINEL REQUIREMENTS

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## Preface

This protocol meets the RISQS Committee and Infrastructure Manager Requirements.

The audit is intended to facilitate the validation of information submitted by Organisation'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 Committee. Audits take place on a random selection in line with the requirements of the Infrastructure Manager. 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 organisations except for those questions and bullet points' denoted (TfL requirement or NWR requirement) which apply only to organisations specifically limiting their scope of works to Transport for London (TfL) or Network Rail (NWR) infrastructure.

The guidance notes are indicative lists, but they are not exhaustive.

## Assessment Requirements

The auditor shall verify that the organisation has fully documented arrangements in place for all the requirements.

# Assessment requirements

## 1.0 Organisation

### 1.1 Management Structure

The auditor shall verify that the organisation has fully documented arrangements in place for the safe and efficient delivery of a contract, ensuring the imbedded capability to understand Construction (Design and Management) Regulations 2015 and other legislation. The arrangements shall include but not limited to:

- a) carrying out appropriate assessments to identify and allocate the key roles listed below to posts in the organisation and have a documented organisation structure indicating these posts and posts carrying out safety critical tasks
- b) a process to review and validate proposed organisational change, identifying and removing risk
- c) appointment (and acceptance) of deputies for posts carrying out key roles
- d) a documented organisation structure, which shall be adequate for the work and remains current and relevant and where the organisation has different structures on projects, they shall demonstrate how this relates to the overall hierarchy
- e) set up the means of communication with the external expert organisation (health and safety, environment, quality or technical expertise is procured from outside the organisation)
- f) defined job descriptions documenting a minimum acceptable competence required for the key roles including experience, professional qualifications, training and certification required responsibilities, authorities and accountabilities of the post and demonstration these have been communicated to and accepted by the post holder

Key roles may include (this list is not exhaustive):

- i. **those with the accountability for** safety management, environmental management, quality management, technical expertise (as required for the work carried out e.g. civil engineering, electrification etc.), rail operations and competence management
- ii. **those with responsibility for** maintaining the management systems, co-ordinating employment medicals, assessing first aid resources to be provided on site, document control, producing and delivering briefing material, procuring products and services (carrying out internal and external audits and other compliance activities as appropriate), competence assessment and training, those with responsibility for safety critical activities (*where relevant as defined Regulation 23 of the Railway and Other Guided Transport Systems (Safety) Regulations 2006*) including monitoring, managing and mitigating against the risk of employee fatigue (including hours worked and authorising exceedances for employees and their organisations' employees) co-ordinating pre-employment, random and 'for cause' alcohol and drugs assessments, planning work (including planning safe access and egress to Managed Infrastructure, recording and reporting accidents and investigations, carrying out risk assessments, responsibilities for business continuity, data protection
- g) appoint personnel responsible for the management of Sentinel sponsored individuals (including the individual authorised to act on behalf of the Organisation to process the Non Trackside Declaration) are defined within the documented organisational charts
- h) capture responsibilities are stated within the applicable role profiles statements / job descriptions.

## 1.2 Health, Safety, Quality & Environmental Competent Support

The auditor shall verify that the organisation has fully documented arrangements in place to ensure the provision of adequate competent health safety, quality and environmental advice to support employees and any individual entering their premises or worksites. The arrangements shall include but not limited to:

- a) the identification of post(s) / role (s) responsible for providing the advice
- b) identifying the extent of information available and specifically from where information and advice is obtained e.g. safety groups, trade federations, external consultants, chamber of commerce etc
- c) how such advice and information is accessed by those who need it
- d) capturing the minimum competence requirements for the post / source providing rail-specific health, safety, quality and environmental advice:
  - i. relevant training (e.g. NEBOSH General Certificate, IRCA, CQI), membership of relevant professional institution (e.g. IEMA, IOSH, IIRSM, CQI or equivalent), knowledge of the health, safety, environmental and quality requirements set out in legislation, Railway Group Standards and Infrastructure Manager standards applicable to railway activities and evidence of experience of providing first line advice and tactical support and development in the relevant discipline
- e) evidence that the health, safety and environmental support has an active involvement in the key elements of health, safety and environmental management such as overseeing the company's risk management process, reviewing safety performance, setting targets, proactively encouraging health, safety and environmental improvements and safe behaviours
- f) demonstration of active engagement with employees in health, safety and environment
- g) where a consultant is used:
  - i. demonstration to ensure that they have had practical experience of providing advice in the organisations area of work
  - ii. that adequate health, safety and environmental competence is available internally for the risk management of daily activities when the consultant is engaged on other business

## 1.3 On-going Competence Management

The auditor shall verify that the organisation has fully documented arrangements in place to test and maintain the effectiveness of their competency management system. The arrangements shall include but not limited to:

- a) identification of tasks where competent execution of the task is required to manage safety effectively (ref. risk assessments)
- b) identification and documenting competence requirements for the tasks to be carried out, considering health, safety and environmental awareness and establishing training and development requirements, the selection of training providers and the provision of initial and ongoing training and mentoring
- c) ongoing coaching and appraisals (both safety critical appraisals and non-safety-critical performance assessments)
- d) verification of the competences of those carrying out competence assessments
- e) a check that the necessary competences are obtained before tasks are undertaken, including checking the competence of their organisations' employees
- f) maintaining training and competence records
- g) demonstration of how the organisation identifies competence requirements for activity
- h) evidence of identifying and meeting statutory competence requirements as distinct from client-specific competencies
- i) evidence that current personnel have experience with that work type (for multi-disciplinary organisations)

- j) records what training or levels of competency required for the position
- k) a process for certification expiry/re-training event dates
- l) the capability to meet the professional qualification requirements and review and changes or updates for its activities (if applicable)
- m) a means of identifying certification expiry/retraining event dates and, where necessary, competency assessment events due dates;
- n) identifies and meets industry/client-specific competence/ training requirements
- o) relevant competency standards been documented, these may be drawn from external organisations
- p) where competency standards have been developed internally these must be signed off by competent personnel
- q) how remote workers are advised of their need to be re-assessed (if applicable)
- r) appraisals of personnel performance and personal training plans put in place

Where the organisation provides Signalling

- a) whether the company has documented process in place for complying with the IRSE Licensing Scheme
- b) where IRSE is used that the organisation has documented procedures for the management of IRSE licensing requirement or confirming the competence of signalling personnel
- c) checking the company has a process in place for the mentoring and development of personnel deemed “not yet competent”
- d) demonstrating that competency management records support the management system presented
- e) having a process for the mentoring, development and re-training of personnel following an accident or who are unfamiliar with an area
- f) ensuring that the track safety and engineering competencies are in accordance with published Network Rail company standards and specification

Where the organisation provides welding services

- a) that rail alumino-thermic trainer/assessors (or trainer/assessor companies) used are approved in the respective processes by Railtech UK and/or Thermit GB Ltd
- b) for arc welding organisations, there are arrangements to gain final approval from Infrastructure Manager prior to carrying out works
- c) for flash butt welding organisations, there are arrangements to gain final approval from Infrastructure Manager prior to carrying out works (hold Infrastructure Manager product acceptance)

## 1.4 Recruitment and Induction

The auditor shall verify that the organisation has fully documented arrangements in place to recruit or sub-contract and induct staff who have the necessary understanding and skills to discharge their duties. The arrangements shall include but not limited to:

- a) a suitable process and evidence of implementation
- b) identification of the competence requirements for job roles
- c) arrangements for selecting personnel (e.g. advertising selection, interview) including assessing candidates' qualifications, experience and skills
- d) a process in place to assess / verify that workers carrying out protection activities can communicate in English (both written and oral)
- e) a suitable induction process and evidence of implementation
- f) training employees and the assessment and development of employees' competence
- g) maintaining records of induction and ongoing communication
- h) communicating the need for workers carrying out safety critical tasks to carry safety critical identification cards: (induction / toolbox talks / briefing records (TfL requirement)

## 2.0 Management Systems

### 2.1 System Arrangements

The auditor shall verify that the organisation has fully documented arrangements in place to manage its activities in a safe and effective manner and take into consideration time, quality, health, safety, environment and cost. The arrangements shall include but not limited to:

- a) the setting of policies, organising resources and processes, identify risks and their associated controls (including interfaces), implementing processes, monitoring performance, reviewing the adequacy and effectiveness of the management system, identifying improvements, and auditing the whole management system at least annually
- b) maintaining an up to date compliance matrix / index
- c) briefing employees on the outline management system
- d) a review of the management system's effectiveness by considering performance against objectives and audit reports
- e) a process to validate organisational changes prior to implementation including risk assessments and including a review of possible impact on product code capability, plus safety and environment, consulting with customers and notifying the 'Organisation Assurance Provider' of changes as a result of organisational change and formal sign off to validate change at appropriate management level
- f) obtaining approval from customers where there is change to the scope of works, standards or designs controlling the engineering / production / delivery process or an organisation / management system and / or the validation process that has identified an increase in overall risk
- g) a systematic approach to promoting continual improvements in its processes relating to work on the railway and for supplying products for use on the railway, the system shall include health, safety, quality of the product or service and the environment

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 an organisation's management system has been certificated by a UKAS accredited organisation (system arrangements and process implementation), and this covers rail work

### 2.2 Pre-sponsorship / Pre-use Process

The auditor shall verify that the organisation has fully documented arrangements in place to manage its activities in a safe and effective manner and take into consideration time, quality, health, safety, environment and cost. The arrangements shall include but not limited to:

- a) contract of sponsorship
- b) pre-sponsorship
- c) competence management
- d) management of sub-sponsors
- e) routine briefings and information cascade processes
- f) management of working hours
- g) procurement, management, calibration and provision of safety critical equipment
- h) provision of personal protective equipment (PPE) and other personal issue equipment
- i) management of misconduct events
- j) reporting all misconduct events to Network Sentinel Investigations (NWR requirement)
- k) misconduct investigations
- l) management of records
- m) prompt de-sponsoring of individuals
- n) membership of an independent and confidential industry reporting service (e.g. NWR and TfL preferred / approved system CIRAS)
- o) familiarisation of protection staff with 'complex' areas

Prior to Primary Sponsorship;

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

Prior to Sub-Sponsorship;

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

## 2.3 Contract of Sponsorship Management

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

- a) provision and management of a valid sentinel card
- b) defining the contractual relationship between the primary sponsor and individual and whether sub-sponsors are permitted
- c) provision of safety critical equipment to enable them to undertake their tasks trackside, typical examples would be lookout equipment, marker boards or current rail indicator devices (CRID)
- d) undertaking checks of an individual's suitability and capability to work on the relevant rail infrastructure prior to engaging in a contract of sponsorship
- e) delivery of an induction briefing which will include as a minimum the rules and responsibilities contained within the Sentinel Scheme Rules
- f) issue of PPE branded with the Primary Sponsors logo
- g) delivery of regular briefings, Rule Book Updates and Sentinel Scheme Rule Updates
- h) provision for training, briefing and assessment events at required intervals
- i) controlled issue of personal issue information such as handbooks and relevant standards
- j) providing advice, guidance or instruction on any restrictions based on medication and other medical fitness issues
- k) mentoring support to develop the competence of the Individual
- l) monitoring the return of all relevant passes and permits
- m) issue of Contracts of Sponsorship to primary sponsored staff
- n) retaining records of contracts of sponsorship for all primary sponsored staff
- o) recording who the sponsored individual is employed by where they are not employees of the sponsoring organisation
- p) annual confirmation that individuals remain suitable to work on the managed infrastructure

**NOTE:** Organisations are only allowed to act as Primary Sponsor for individuals who are undertaking work for the sponsoring organisation whether directly or through a sub-contractor

## 2.4 Misconduct Processes

The auditor shall verify that the organisation has fully documented arrangements in for dealing with instances of misconduct of sponsored staff. The arrangements shall include:

- a) investigating where any suspected misconduct event becomes apparent
- b) collection of information from sub-sponsors to enable the collation and conclusion of the local investigation including the reporting to Sentinel Investigations

- c) maintaining all records associated with the sponsorship of an individual, as required by the Sentinel Scheme Rules
- d) maintaining all records associated with a misconduct investigation and providing these to Network Rail Sentinel Investigations
- e) not de-sponsoring an individual on the grounds of misconduct without first conducting an investigation and misconduct hearing for that individual

## 2.5 Management of Legal and Other Requirements

The auditor shall verify that the organisation has fully documented arrangements in place to ensure that they obtain, review changes, interpret the impact of the Infrastructure Manager, Client and legislative requirements relevant to their own scope of works / services. The arrangements shall include but not limited to:

- a) how the organisation accesses legislation including safety, health and environmental, GDPR and standards applicable to the rail sector appropriate to the scope of services provided (Railway Group Standards, NWR standards TfL QUENSH)
  - i. a register/s of the above applicable to the scope of works
  - ii. review by way of a business impact assessment the risk
- b) designated competent posts that are responsible for reviewing the requirements
- c) how the requirements are to be implemented and briefed
- d) how the necessary changes will be made to the management system
- e) where applicable confirming to the customer representative that changes have been made and seeking authorisation for non-compliances when compliance is not possible or appropriate
- f) maintain an aspects and impacts register specific to the scope of works and where applicable an additional project specific document

## 2.6 Policy Control

The auditor shall verify that the organisation has fully documented arrangements in place to demonstrate to employees and other affected parties, the organisation's top-level management commitment to Safety, Health, Environment and Quality requirements and identify the overall framework within which the Organisation operates. The arrangements shall include but not limited to:

- a) Organisation policy statements covering Health and Safety, Environmental, Quality, Drugs and Alcohol, Fatigue Management (Working Hours), General Data Protection Regulations (GDPR) and Modern Slavery (where applicable)
- b) that the policies / policy shall meet UK legislative requirements, be dated and current, be endorsed at top level management (i.e. signed-off by a currently employed person at Director Level, cover all areas of the organisation's business, be communicated to all employees on initial induction and following policy changes, be communicated to their suppliers (as necessary) and other interested parties and be reviewed regularly (annually as a minimum)

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

- c) safety, in so far as is reasonably practicable
- d) providing sufficient resources for the management of health and safety
- e) setting and monitoring safety objectives
- f) continual improvement in safety performance
- g) safe behaviours and re-educating un-safe behaviours
- h) whether the organisation is certificated to any standards (e.g. ISO 45001:2018 or any specific standards for the type of product or service)

The Environmental Policy Statement shall contain a clear commitment to:

- a) preventing pollution



- b) specifically protecting the environment, with reference to aspects of work activities that are environmentally significant
- c) specifically minimising the environmental impact, for the life cycle; (including disposal), of plant, equipment, and other physical assets under the control of the organisation
- d) setting and monitoring environmental objectives
- e) continual improvement in environmental performance
- f) whether the organisation is certificated to any standards (e.g. 14001:2015 or any specific standards for the type of product or service)

The Quality Policy statement shall contain:

- a) whether the organisation is certificated to any standards (e.g. ISO 9001:2015 or any specific standards for the type of product or service)
- b) the setting and monitoring of quality objectives
- c) a commitment to work with organisations and customers to establish and maintain the highest quality standards
- d) a commitment to continual improvement in quality performance

The Drugs and Alcohol Policy statement shall contain:

- a) a commitment to meet Client and Infrastructure Manager requirements
- b) provide details around the meeting the specific elements of these requirement
- c) a commitment to unannounced random testing where applicable (documented timeline, within the 12-month period of the audit)

The Fatigue Management Policy statement shall contain:

- a) a commitment to meet Client and Infrastructure Manager requirements
- b) provide details around the meeting the specific elements of these requirements

The Modern Slavery Policy statement shall contain:

- a) a commitment to legal compliance, ethical standards and fundamental human rights as set out by the principles of the ILO/UN Guiding Principles
- b) a commitment to raising awareness of modern slavery issues including how to spot the signs in the business and supply chain
- c) provision(s) for whistleblowing or other mechanism(s) for reporting issues
- d) a nominated person at the most senior management level within the business that has responsibility for preventing modern slavery within the business
- e) a commitment that the policy applies and is communicated within the business and their supply chain
- f) a commitment to address and directly prohibit practices that are known to contribute to the risk of modern slavery
- g) due diligence requirements for the business and supply chain and the steps it will take should modern slavery practices be identified within either
- h) the identification of and management requirements for any high-risk materials/labour sourcing

## 2.7 Control of Bribery

The auditor shall verify that the organisation has fully documented arrangements in place to manage and control the risk of bribery occurring among an organisation's employees and within 'agents' acting on behalf of the organisation. The arrangements shall include but not limited to:

- a) a periodic and formal assessment of the risk of bribery within its organisation or that of its associated persons
- b) clear, practical and accessible anti-bribery procedures proportionate to the risks identified
- c) top level commitment to the prevention of bribery
- d) carrying out due diligence on its organisations, subcontractors and agents to identify any corrupt practices
- e) communication of the anti-bribery procedures to staff and 'agents'
- f) monitoring and periodically review the policy and procedures particularly if conditions change

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

The auditor shall verify that the organisation has fully documented arrangements in place for managing the refusal to work on the grounds of Health and Safety (Work Safe). The arrangements shall include but not limited to:

- a) a documented Policy, which includes an escalation process in the event of a conflict / disagreement and details that employees are not penalised for refusing to work on grounds of Health and Safety, advising employees of the arrangements and encouraging them to report unsafe acts and conditions and providing details of the Confidential Incident Reporting & Analysis System (CIRAS)
- b) records of briefing the Policy, including briefings to line managers not to discriminate against employees who raise such issues
- c) records of reports of unsafe acts and conditions, demonstrating timeliness and positiveness to employees refusing to work on the grounds of Health and Safety, recognising the right of employees to escalate such concerns to the appropriate level of the organisation without fear of discrimination
- d) checking that their organisations have similar refusal to work policies in place

## 2.9 Document Control

The auditor shall verify that the organisation has fully documented arrangements in place for identifying, approving, controlling, distribution and making readily available at the point of use up to date information required for their operations. The arrangements shall include but not limited to:

- a) identify the key documents requiring control e.g. National and International Standards, Relevant Legislation, Industry and contract specific documentation and documents supporting the organisation's processes
- b) identifying any legislative requirements (use of data / documents, retention etc Data Protection Act 2018)
- c) how documents are reviewed, and changes identified, are issued and reach their point of use and in particular multi sites
- d) the process for cancelled and superseded documentation, archiving and retention
- e) how the organisation controls the issue of drawings to specialist functions and construction functions / organisations by: maintaining a register of all controlled documents, approving the contents of documents produced internally, controlling and distributing all registered documentation including amendments to employees and to their organisations, removing obsolete documentation promptly, retaining records for legal and / or knowledge preservation purposes, including the periods of retention required, controlling personally issued railway documentation such as the TfL Log Books, Rule Book and Electrified Line Instructions

## 2.10 Restoration of Service (Business Continuity)

The auditor shall verify that the organisation has fully documented a business continuity arrangement in place to identify critical operations and risk and provide a plan to maintain and / or restore operations during a crisis. The arrangements shall include but not limited to:

- a) demonstration that business continuity has been addressed within the business using a formal plan or corporate process
- b) a phased recovery plan with key recovery stages identified
- c) allocating responsibility to a senior person within the business for business continuity

- d) identifying command and control structure in all key areas of the business so the programme is implemented to minimise disruption to production / service
- e) identifying a communications person (for business continuity issues) to deal with media, internal communication and other interested parties including customer base where applicable
- f) a programme for testing, reviewing and amending where applicable the arrangements
- g) are there deputy arrangements in place

## 2.11 Workforce Involvement

The auditor shall verify that the organisation has fully documented arrangements in place to make employees aware of changes to arrangements and to enable them to make contributions towards improvements. The arrangements shall include but not limited to:

- a) consulting employees when
  - i. procedures are to be changed
  - ii. the organisation is to be changed
  - iii. new technology, systems and processes are to be introduced
  - iv. conducting risk assessments
  - v. reviewing general performance matters
- b) recording suggestions made by employees
- c) reviewing suggestions and providing a response to employees

## 3.0 Supply Chain Management

### 3.1 Supplier and Subcontractor Management

The auditor shall verify that the organisation has fully documented arrangements in place to select and manage capable and competent organisations of products / services to undertake work in a safe and efficient manner whilst paying due regard to the environment and quality of work delivered. The arrangements shall include but not limited to:

- a) a check that their organisation is competent and have the resources to carry out the work
- b) a check that the providers of designated services to the organisation (e.g. PTS and associated training, alcohol and drugs testing) are an industry approved scheme
- c) a controlled process to approve and maintain organisations
- d) carrying out risk-based planned general inspections of their organisations' worksites
- e) carrying out risk-based audits on their organisations' management system
- f) a review of their organisations' performance
- g) to produce and make available to appropriate employees, a list of qualified organisations containing sufficient and appropriate information to aid selection for contract
- h) a review periodically of organisations' qualifications (annually as a minimum)
- i) assessment of the historical competence of its supply chain and their ability to meet designated functions under UK Legislation
- j) mechanism to identify the relevant licences and trade associations that the supply chain are members of dependent upon the scope of service offered and records kept
- k) a process in place for ensuring information is provided to potential organisations and understood by them
- l) processes to manage sublet work/design packages with
- m) a check that they can meet UK regulatory requirements (organisations based overseas)
- n) an approval process in place prior to placing a contract for works with an approved supply chain member
- o) a check that they are managing its modern slavery risks, including policies, briefing of staff and their supply chain
- p) their supply chain holds the minimum levels of insurance applicable

- q) a mechanism for supply chain auditing or the use of third-party systems or organisations to undertake this for them
- r) a process for recording and monitoring of any corrective actions raised at supply chain audits
- s) post contract reviews of supply chain performance and the results of these reviews should be communicated through the business
- t) a mechanism to verify and ensure that products and components procured are approved and fit for purpose

### 3.2 Management of Sub Sponsors

The auditor shall verify that supplier has fully documented arrangements in place for establishing a sub-sponsor agreement and confirming that the individual being sub-sponsored has a contract of sponsorship with their primary sponsor . These arrangements shall include:

- a) a process for reviewing and then either approving or rejecting the sub-sponsors request. Where rejected, a reason for rejection must be provided
- b) a documented list of sub-sponsors and any associated agreements for sharing of labour that are in place between the organisations
- c) a process for reviewing Sentinel Reports, and for analysing usage by sub-sponsors
- d) the means of obtaining information on an individual from the Sub-Sponsor
- e) requesting permission to use an Individual from their Primary Sponsor and receiving confirmation of sub-sponsorship status before resourcing the Individual to work
- f) co-operating with and 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:

- o information on working hours, safety incidents, Competencies used and competence short- falls
  - o notifying any safety issues or misconduct events as soon as is reasonably practicable after the event has occurred
  - o providing all other safety related information on request
- g) 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
  - h) provision of the Safety Critical equipment, required to enable the Individual to undertake their trackside tasks where they put an individual to work, ensuring that it is fit for purpose in accordance with the Sentinel Scheme Rules. An example would be the provision of lookout equipment, marker boards or current rail indicator devices (CRID)

*NOTE The Sponsor is responsible for ensuring this equipment is provided fit-for-purpose, in accordance with the Sentinel Scheme Rules*

- i) maintaining all records associated with any works undertaken by an individual, as is required by the Sentinel Scheme Rules
- j) maintain all records associated with a misconduct investigation and provide these to the Primary Sponsor and the relevant rail infrastructure manager for Sentinel Investigations (e.g. NWR, TfL)
- k) maintain the necessary insurance for works undertaken by individuals working on their behalf, regardless of their sponsorship arrangements
- l) 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.

## 4.0 Project Management

### 4.1 Emergency and Contingency Planning

The auditor shall verify that the organisation has fully documented arrangements in place to respond to emergencies, including having sufficient first aid qualified employees and maintained first aid facilities available. The arrangements shall include but not limited to:

- a) the preparation and distribution of emergency response plans to its own personnel and organisations and other affected parties and where the emergency and contingency planning is the responsibility of another party a plan to communicate and review the applicable arrangements
- b) the production and distribution of an emergency contact list
- c) an assessment of the requirement and provision of equipment for use in the event of an emergency including first aid facilities
- d) the provision of sufficient competent personnel e.g. first aid staff
- e) briefing workers on the plans and testing the effectiveness and understanding of such plans
- f) interfacing with, and assisting, Client, Principal Contractors, Infrastructure Manager, Regulatory Authorities, and the emergency services, etc.
- g) a review and revision of the plans, particularly after an accident/incident or an emergency
- h) an assessment of the extent of first aid facilities required to be provided on site
- i) a mechanism the organisation would follow if an issue around modern slavery in your business and/or supply chain is uncovered

### 4.2 Communication and Coordination

The auditor shall verify that the organisation has fully documented arrangements in place for the sharing of information on risk with interfacing organisations and confirming their employees are suitable briefed to achieve a co-ordinated approach to implementing risk control measures. The arrangements shall include but not limited to:

- a) co-operate / inform other organisations working in the same area regarding the implementation of control measures for the adequate overall control of risk and brief their employees of any risks and the controls required
- b) provide access to premises, worksites and employees for inspections and audits by organisations who may be affected by the organisation's operation
- c) co-operate with the Principal Designer and/or Client (as applicable) to enable each party to discharge their duties under CDM 2015, the MHSWA Regs and any other relevant statutory duty
- d) co-operate with the Principal Contractor by providing details of risks to HS&E from the organisation's activities, contractors appointed by the organisation to work on the project, details of accidents and dangerous occurrences, details of pro-active (leading) metrics (e.g. outputs from PGIs, Safety Tours and Audits)
- e) identify how the organisation engages with the wider construction team to coordinate delivery of their service to, so far as reasonably practicable, safeguard the health and safety of those carrying out the work and those who are affected by the work
- f) document control including a process for validating and incorporating appropriate documents or information from their organisation (including method statements, work package plans, RAMS, task briefing sheets, environmental management plan to staff and their organisations as applicable)
- g) implementation of a meeting structure for the dissemination of HS&E information to all relevant personnel, indicating frequency, attendees and overall purpose of each meeting and documenting attendance
- h) determine an appropriate variety of methods of communication, produce and deliver briefing material to facilitate a two-way process for communication on HS&E matters and documenting attendance

- i) provide details of regulatory visits to customers. e.g. by HSE / ORR / EA / SEPA etc.
- j) provide information to site workers on site rules, risks to HS&E risks measures for reducing risk, procedures to be followed in the event of an accident or other emergency
- k) raising awareness of modern slavery risks within the organisation and its supply chain

### 4.3 Welfare Arrangements

The auditor shall verify that the organisation has fully documented arrangements in place for ensuring the provision of adequate welfare facilities (irrespective of work location) for personnel under their control, including the provision of drinking water, toilets washing and rest facilities. The arrangements shall include but not limited to:

- a) provision of appropriate facilities following an assessment considering the expected work duration (including 'door to door' travelling time), the size and location of site, type of work to be undertaken and the number of people involved in the work, requirement of mobile facilities at transient work sites where fixed public facilities are not reasonably accessible
- b) maintenance of the facilities to an appropriate level of hygiene and cleanliness
- c) where an organisation does not provide the welfare for their staff, details of how they check the adequacy of the welfare provided for their staff

### 4.4 Insurance arrangements

The auditor shall verify that the organisation has fully documented arrangements in place to provide sufficient financial cover in the event of matters of an unseen nature arising that result in loss or damage or financial loss. The arrangements shall include but not limited to:

- a) a review on the cover required as a minimum annually or before a new contract commences
- b) providing at least the minimum levels of insurance required by law
- c) providing levels of insurance as specified on a contract specific basis
- d) acknowledging that Network Rail will provide Contractor all risks and public liability insurance or self-insurance on construction projects
- e) making subcontract arrangements that pass on appropriate insurance requirements
- f) maintaining required insurances with reputable insurers for the periods stated in the contract

## 5.0 Plant & Equipment

### 5.1 Management, Maintenance and Servicing

The auditor shall verify that the organisation has fully documented arrangements in place to select only plant and equipment that are technically sound, fit for purpose and safe to use in the intended application. The arrangements shall include but not limited to:

- a) to create, maintain and make available to appropriate employees an approved supplier list
- b) a check that products and plant are procured only from an organisation on the approved organisation list
- c) an assessment of the risks and identification of control measures when selecting products and plant
- d) review that equipment and tools have been fully assessed for occupational health impacts (noise, haws dust etc) and then the correct control measures and training applied
- e) a check that all other goods and products to be used on railway related contracts are fit for purpose
- f) how information is shared with customers/users regarding damaged equipment or equipment under temporary repair before going back into service
- g) audits on implementation of organisations' management system
- h) a review of their organisations' performance

- i) review periodically their organisations' qualifications
- j) check work equipment is fit for purpose
- k) have a process to identify each item of plant or machinery
- l) for organisations providing On-track plant (OTP) an up to date inventory of all on-track plant that it operates
- m) arrangements to approve all plant, small hand tools and equipment prior to use
- n) processes to control calibration requirements (if applicable)
- o) check equipment hired from a third party is fit for purpose
- p) having processes in place to identify and deliver statutory and other inspections/ service maintenance (e.g. vehicle mounted fire extinguishers, lifting accessories, LEV);
- q) checking maintenance and service procedures identify quarantine arrangements so equipment that is not fit for purpose cannot be used
- r) *NWR requirement* mechanism to identify products and plant falling within the scope of NR/L2/RSE/100/05

## 5.2 Use of plant and equipment (including safety critical)

The auditor shall verify that the organisation has fully documented arrangements in place to use only plant and equipment that is properly maintained and that it is operated by competent individuals and are implementing relevant statutory requirements, including the Provision and Use of Work Equipment Regulations 1998. The arrangements shall include but not limited to:

- a) checking that only approved plant and equipment is used (in line with Client, PC or Infrastructure Manager requirements)
- b) identification of a safe method of use based on the risk assessment findings, and consideration has been given to plant, transportation, access and use, and the need for appropriate PPE
- c) a mechanism for identifying plant and equipment for control and maintenance purposes
- d) a mechanism for identifying maintenance of supplied plant and equipment
- e) calibrating tools and equipment (where applicable)
- f) establishing supervision requirements providing information regarding operator training
- g) the segregating (quarantine) of substandard and faulty plant and equipment, so that it is not unintentionally put into service
- h) a mechanism for checking that lifting equipment and its ancillary (chains/ slings/ strops) equipment are used, with processes to check they remain safe (if applicable)
- i) detailing the competence requirements for internal staff involved in maintenance, inspections and servicing of equipment
- j) checking maintenance work plans are signed by a competent person
- k) checking 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
- l) retaining records of completed maintenance/service check sheets for all machines, trailers and attachments
- m) checking arrangements are in place for the implementation of 'Pre-Delivery Inspection' (Fitter) and 'Prestart' checks (Operator) and that these are formally recorded
- n) having, where applicable, a documented process for the reporting of high risk / safety related defects

## 6.0 Risk Management

### 6.1 Health, Safety and Environmental Risk Controls

The auditor shall verify that the organisation has fully documented arrangements in place to identify and manage all risk to the organisation, its Client and the Managed Infrastructure. The arrangements shall include but not limited to:

- a) a designated competent person responsible for compiling and authorising the risk assessments that understands infrastructure specific risks appropriate to the scope of services
- b) the methodology for identifying and assessing and capturing all potentially hazardous events, including:
  - i. the likelihood and severity of the consequences (e.g. via risk ranking matrix, FMEA, HAZOP as appropriate)
  - ii. that the appropriate section of employees has been involved in the process
  - iii. consideration of direct and indirect impacts under normal, abnormal and emergency conditions
  - iv. quantification of the environmental risk including managing issues related to noise and any restrictions on working hours
  - v. risk generic to the organisations scope of operations and unique to each particular contract
  - vi. identifying, implementing and reviewing that all reasonably practicable control measures, and these measures have been included in company processes and site-specific documents (method statements, task briefing sheets, work package plans, environmental management plan)
  - vii. checking that risk assessments required by COSHH, PPE and Manual Handling legislation are carried out
  - viii. review and briefing of all safety instructions, alerts, bulletins etc
- c) for encouraging the identification of on-site dynamic risk
  - i. the methodology for capturing, updating and briefing dynamic risk on-site
  - ii. the methodology for reviewing dynamic risk assessments and updating risk log
- d) a risk log, documenting all assessment findings, including identifying the generic top ten hazards/risks with the highest evaluated risk, periodic reviews (maximum to ensure that the control measures remain adequate and effective, ad-hoc reviews when new information is received which may change a risk
- e) production and review of an environmental aspects and impacts register
- f) communication of risk assessments to staff, clients and all other affected parties and retraining briefing records
- g) reinforcement of safe behaviours and re-educating un-safe behaviours
- h) identifying risk controls within the organisations processes and communicating them throughout their organisation
- i) ensure responsibility for implementation of these arrangements has been allocated to competent person/s, including Professional Heads
- j) the monitoring / reviewing of control measures on a regular basis by personnel who understand the work being assessed
- k) mechanism for incorporating / referencing risk assessments into method statements / task briefing sheets
- l) evidence that the risk controls on site correlate with the risk controls on the relevant risk assessment
- m) a review of the effectiveness of the controls put in place

## 6.2 Control of Substances Hazardous to Health

The auditor shall verify that the organisation has fully documented arrangements in place demonstrating an understanding of the risks and controls required to comply with the Control of Substances Hazardous to Health (COSHH) Regulations. The arrangements shall include but not limited to:

- a) identifying any substances used that may fall within the scope of the COSHH Regulations
- b) the provision and use of up to date Manufacturers Safety Data sheets for all substances used
- c) formal COSHH assessments based upon the Manufacturers Safety Data sheets have been undertaken, including on site locations
- d) COSHH Assessments have been briefed in all offices and site locations, to all employees, suppliers, subcontractors and the Client as applicable and records of briefing retained



## 6.3 Personal Protective Equipment

The auditor shall verify that the organisation has fully documented arrangements in place to demonstrate they understand the risk and their responsibilities to their employees, to ensure they are provided with appropriate PPE and are trained in its use. The arrangements shall include but not limited to:

- a) the issue and retention of records of all appropriate PPE free of charge to its employees and where applicable all primary sponsored staff
- b) the issue of PPE at induction and following loss or damage
- c) monitoring the use of PPE
- d) detail the PPE required in the risk assessment processes
- e) confirm subcontractors working on associated projects have suitable controls in place for PPE
- f) evidence of a review of the effectiveness, through employee engagement of that PPE supplied has provided adequate protection for the activities being performed
- g) compliance with LOLER, PUWER and where applicable fall arrest / fall prevention equipment
- h) a process for performing risk assessments for when PPE is to be reduced for particular activities
- i) confirming the suitability of PPE for all sub-sponsored personnel when working on behalf of the Supplier

## 6.4 Management of a Close Call, Near Miss, Accident and an Incident

The auditor shall verify that the organisation has fully documented arrangements in place to report, investigate and analyse accidents, incidents, close calls and near misses (including safety and environmental events) involving their employees and/or operational activities and implement measures to prevent recurrence, and share any lessons learned within the industry. The arrangements shall include but not limited to:

- a) demonstration of their understanding of and compliance with the requirements of RIDDOR
- b) have a nominated person for the statutory reporting of accidents and incidents as identified in RIDDOR (head office and site if different)
- c) maintain records of accidents, incidents, near misses and close calls
- d) retain evidence that it has communicated the accident reporting process to its workforce and where applicable sub-contractors
- e) a process for undertaking local investigations, that contains competence of people undertaking the investigation, briefing operatives to make them aware of the investigative process, a mechanism for feeding into the Clients formal enquiry process, arrangements to assist and provide records to enforcement agencies (ORR, Police, Environment Agency, HSE)
- f) producing, analysing and reporting of accident, incident and dangerous occurrences statistics and making these reports available Clients or enforcement agencies
- g) identification of the underlying / root causes of any accidents and incidents and that the appropriate corrective actions have been implemented
- h) managing accident / incidents appropriate to the severity of the event including arrangements to reach a clear understanding of responsibilities for reporting and investigation on shared worksites
- i) reporting to the Client, PC and Infrastructure Manager all safety and environmental 'close calls', 'near misses' and accidents (including all events in relation to pollution and or damage to the environment, property and equipment)
- j) understanding and managing investigations of accidents and incidents in accordance with Client and Infrastructure Manager requirements
- k) appointing a competent person to undertake an investigation, Railway Group members shall demonstrate procedures to appoint a Designated Competent Person (DCP) as appropriate to set investigation remits and appoint a lead investigator
- l) identifying and tracking corrective and preventative actions until closed out, including re-assesses of risks, if appropriate, brief employees and other parties on the findings of the

- investigation reports and share lessons learned via channels such as RPA, RICA, Rail Alliance, site and contract meetings with clients etc
- m) implementing (when applicable) and track internal progress of organisation actions following recommendations from major investigations/inquiries/inquests into accidents/incidents, e.g. HSE, ORR, RAIB, Coroner, Public Inquiry, industry investigation, Environment Agency

## 7.0 Human Resources including Occupational Health Management

### 7.1 Occupational Health

The auditor shall verify that the organisation has fully documented arrangements in place to be aware of the health and wellbeing of their employees and to meet occupational health surveillance requirements. The arrangements shall include (but is not limited to):

- a) having a process in place for long-term health issues to be risk assessed by a competent professional
- b) documenting who has been involved in setting up the occupational health process (employees, specialist advice, unions or representatives)
- c) detailing how the potential hazards are identified
- d) having processes in place to bring the risks down to as low as is reasonably practicable
- e) understanding the pre-employment medical condition of all employees
- f) having a process in place for when personnel change roles for reviewing their occupational health requirements assessed prior to starting
- g) undertaking a programme of routine health surveillance
- h) having processes in place to ensure that control measures remain appropriate to individual's condition/ requirements
- i) having access to occupational health surveillance/ advice, undertaken inhouse or by a specialist provider
- j) detailing how often is the occupational health process reviewed and record evidence of this review
- k) detailing whether they manage their subcontractors in this area, if applicable
- l) securely storing its occupational health information on employees
- m) giving employees the opportunity to review the records kept regarding them if requested
- n) retaining records for the minimum period applicable to the type of record
- o) mental health and stress management
- p) mechanism for individuals to confidentially seek assistance when they have concerns, they may be developing a habit/problem (e.g. alcohol and/or drugs)
- q) carrying out pre-employment medical examinations
- r) checking that persons engaged to work on rail infrastructure meet the requirements set out for 'pre-employment, pre-appointment & periodic testing for alcohol & drugs
- s) having a process for managing any employee declaring:
  - i. A negative change to their state of health or
  - ii. The taking prescription drugs that may impact on the safety of themselves or others
- t) obtaining medical self-certifications for Track Visitor Permits
- u) checking their supplier's arrangements for employee medicals

### 7.2 Managing worker and organisations' workers' fatigue

The auditor shall verify that the organisation has fully documented arrangements in place for identifying, risk assessing, planning and preventing the fatigue of employees, agency, contractors and sub-contractors. The arrangements shall include (but is not limited to):

- a) identifying the activities and tasks in the organisation and organisation's organisations where fatigue could result in impaired performance and increased operating risk
- b) carrying out fatigue risk assessments (HSE's FRI or similar may be utilised)
- c) the working time limits that workers shall be permitted to work
- d) planning work so that exceedances are not required
- e) authorising unforeseen exceedances (including risk assessments)
- f) monitoring actual hours worked

- g) analysing trends in hours worked (including travel time, etc) and correlating this with incident data, skill availability and sickness/absence data and taking appropriate action in the light of identified patterns and trends
- h) plans and objectives for controlling actual hours
- i) plans and objectives for reducing unforeseen exceedances (if applicable)
- j) 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
- k) retention of records as per control of working hours for staff undertaking safety critical work' (ROGS)
- l) assessment of what fatigue arrangements are appropriate for their staff including compliance with ROGS
- m) the working time limits that workers shall be permitted to work \*
- n) confirming that sponsored staff 'swipe-in' and 'swipe-out' of Sentinel when working trackside (*NWR requirement*)
- o) assessment of what fatigue arrangements are appropriate for their staff including compliance with ROGS\*\*
- p)

### 7.3 Alcohol and drugs arrangements

The auditor shall verify that the organisation has fully documented arrangements in place for checking that all workers under its control do not access Network Rail Managed Infrastructure or carry out safety critical tasks while under the influence of drugs or alcohol. The arrangements shall include (but is not limited to):

- a) briefing employees on drugs and alcohol (company/client/railway group) policy i.e. pertaining to work activity
- b) managing employees (and their organisations' employees) taking prescription and over the counter medicine
- c) selecting and appointing an approved drugs and alcohol testing provider
- d) 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
- e) carrying out a risk-based programme of random testing (5% per annum is typical)
- f) carrying out 'for-cause' testing – i.e. following accidents, serious incidents or suspected of being unfit through drugs or alcohol, where applicable
- g) implementing actions following a failure of a drugs and alcohol test
- h) access and update arrangements to the Sentinel database for changes to status of sponsored 'Sentinel' employees dealing with appeals internally
- i) keeping records (10 years from the date of testing and records of positive tests shall be retained indefinitely) access and update arrangements to Sentinel databases for changes to status of sponsored 'Sentinel' employees
- j) dealing with appeals
- k) carrying out 'for-cause' testing – i.e. following accidents, serious incidents or suspected of being unfit through drugs or alcohol
- l) carrying out annual Alcohol & Drugs screening (TfL requirement)
- m) 'Fit for Work' policy – checks of fitness to work when booking on for duty – signed declarations (TfL requirement)

Auditor Note: \* - A 'For cause' contract shall not be required **only** 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.

## 7.4 Employment medicals

The auditor shall verify that the organisation has fully documented arrangements in place to minimise the risk of workers, suffering from medical conditions that may adversely affect themselves or others. The arrangements shall include (but is not limited to):

- a) carrying out pre-employment medical examinations in line with Infrastructure Manager requirements
- b) carrying out routine medical examinations, including risk-based health surveillance as appropriate
- c) a process for managing any employee declaring a negative change to their state of health or the taking of prescription drugs that may impact on the safety of themselves or others
- d) obtaining medical self-certifications for Track Visitor Permits
- e) checking their organisation's arrangements for employee medicals
- f) NWR only requirement checking that persons engaged to work meet the requirements set out in NR/L2/OHS/00120

## 8.0 Monitoring

### 8.1 Monitoring

The auditor shall verify that the organisation has fully documented arrangements in place for proactive and reactive monitoring and analysis of their own performance and that of their organisations to ensure they are appropriate for the safe, effective and efficient delivery on site. The arrangements shall include but not be limited to:

- a) a set of appropriate health safety and environmental objectives, for the organisation and contract / project site specific level
- b) the creation and implementation of a schedule of site inspections, safety tours and audits, where the frequency is determined based on risk and contract specific requirements
- c) identification of the posts / representatives that carry out the inspections, tours and audits
- d) producing reports that identify suitable corrective action when shortfalls are identified (or noting good practice)
- e) tracking the close out of resulting corrective actions or the dissemination and adoption of good practice
- f) analysing and reporting of data including the identification of trends and significance of the data and corrective actions reviewed at senior management level
- g) 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)
- h) from carrying out site inspections, audits and safety tours
  - i. performance against objectives (including safety & environmental) and accident frequency rates (AFRs or alternative measures appropriate to organisation size and scope of work)
  - ii. reviewing and discussing organisations' performance with their organisations
  - iii. identification, tracking and the close out of corrective actions and/or improvement plans
  - iv. testing the adequacy and effectiveness of risk controls
  - v. identification of new/emergent and changing risks
  - vi. carry out audits of internal management systems
- i) when shortfalls are identified (or noting good practice), tracking the close out of resulting corrective actions or the dissemination and adoption of good practice
- j) that quality inspections of the installation work are carried out