

# RISQS Audit Protocol

## Sentinel

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02	Gillian Scott			27-03-19	Logo change only
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## Preface

This protocol meets the RISQS Committee and Infrastructure Managers requirements for Prequalification.

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 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 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.

This module is applicable to suppliers wishing to be a sponsor within the Sentinel Scheme. It 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'.

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. Organisation

### 1.1 Management Structure

The auditor shall verify that the organisation has fully documented and imbedded arrangements in place. The arrangements shall include:

- a) appoint personnel responsible for the management of Sentinel sponsored individuals
- b) confirm the management of sponsorship duties within the Sentinel scheme are defined within the documented organisational charts
- c) capture responsibilities are stated within the applicable role profiles statements / job descriptions.

### 1.2 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. 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. The arrangements shall include:

- 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

### 2.2 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

### 2.3 Policy Control

The auditor shall verify that the organisation has fully documented arrangements in place to demonstrate to employees and other affected parties their top-level management commitment to compliance with the Sentinel Scheme Rules. The arrangements shall include:

- a) the production, briefing and displaying copies of an
  - o Alcohol & Drugs Policy statement
  - o Fatigue Management (Working Hours) Policy statement
- b) maintain records of communicating the policies to all employees on induction, starting a contract and following policy changes
- c) maintain records of communication to their suppliers (as necessary) and other interested parties
- d) review policies at least annually
- e) check that a Senior Manager employed within the organisation has signed and dated the above policy statements

### 3. Supply Chain Management

#### 3.1 Management of Sub Sponsors

The auditor shall verify that Sponsor has fully documented arrangements in place when acting as the sub-sponsors for establishing a 'Contract of Sponsorship' with each Individual Sentinel Card Holder. 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.
- m) issuing Contracts of Sponsorship to sub-sponsored staff
- n) retaining records of Contracts of Sponsorship for all sub-sponsored staff

## 4. Human Resources including Occupational Health Management

### 4.1 Occupational Health

The auditor shall verify that the organisation has fully documented arrangements in place to demonstrate that workers under its control meet and maintain the health requirements in as specified in customer / client standards (e.g. NWR or TfL) and Railway Group Standards. The arrangements shall include:

- a) carrying out pre-employment medical examinations
- b) checking that persons engaged to work on rail infrastructure meet the requirements set out for 'pre-employment, pre-appointment & periodic testing for alcohol & drugs
- c) having a process for managing any employee declaring:
  - o A negative change to their state of health or
  - o The taking prescription drugs that may impact on the safety of themselves or others
- d) obtaining medical self-certifications for Track Visitor Permits
- e) checking their supplier's arrangements for employee medicals

### 4.2 Fatigue Management

The auditor shall verify that the organisation has fully documented arrangements in place in addition to 7.2 of the Core Audit Protocol to identify, risk assess, plan and to prevent the fatigue of all their workers and suppliers working under the Sentinel Scheme Rules. The arrangements shall include:

- a) the working time limits that workers shall be permitted to work \*
- b) confirming that sponsored staff 'swipe-in' and 'swipe-out' of Sentinel when working trackside (*NWR requirement*)
- c) assessment of what fatigue arrangements are appropriate for their staff including compliance with ROGS\*\*

### 4.3 Alcohol and Drugs Management

The auditor shall verify that the organisation has fully documented arrangements in place in addition to 7.3 of the Core Audit Protocol for checking that all workers under its control do not access rail Infrastructure (e.g. NWR, TfL) or carry out safety critical tasks while under the influence of alcohol or drugs. The arrangements shall include:

- a) access and update arrangements to Sentinel databases for changes to status of sponsored 'Sentinel' employees
- b) dealing with appeals
- c) carrying out 'for-cause' testing – i.e. following accidents, serious incidents or suspected of being unfit through drugs or alcohol
- d) carrying out annual Alcohol & Drugs screening (*TfL requirement*)
- e) '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.