

RISQS Audit Protocol

Sentinel

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Revision	Author	Checked by	Approved by	Date approved	Reason for revision
01	Carl Rulton	Alan Thomas	Richard Sharp	27-02-18	Initial issue
02	Gillian Scott			27-03-19	Logo change only
03	Phil Smith	RSSB Assurance Team	Gillian Scott	July 20	Align with Module 03 NR/L2/SCO/302
04	Paul Haynes	RSSB Assurance Team	Carl Rulton	14/06/21	Logo change only
05	Phil Smith	Martin Littlewood	Tony Howard	10/01/23	Separation of types of evidence for verification, audit or assessment

Preface

This protocol is designed to assess a supplier's Sentinel Management System and compliance with the RISQS Committee and Infrastructure Manager requirements for pre-qualification to Sentinel.

Suppliers that require Sentinel access will undertake the audit upon initial request and on a periodic basis. 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.

Scope

This module is applicable to suppliers who are sponsoring individuals within the Sentinel Scheme.

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.

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

Assessment Requirements

As part of RISQS' commitment to ensuring efficient auditing and advantageous assurance levels, the assessment will cover two parts:

- The first part 'A process for...' is a review of the documented procedures and processes that are required to assist a supplier in their delivery of a safe efficient service to the rail industry.
- The second part 'Evidence of...' is an evidential based audit to assess the implementation or use of the processes and procedures described in first part.

1. Organisation

1.1 Management Structure

The supplier shall provide evidence which demonstrates the organisation has an adequate structure in place for managing the responsibilities of the Sentinel Scheme Rules. The arrangements shall include:

- a) Evidence of:
 - i. appointing personnel with responsibility for the management of Sentinel sponsored persons
 - ii. the post for managing sponsorship duties documented on the organisation chart
 - iii. capturing the responsibilities within the applicable role profile statements / job description; and ensuring it is accepted/acknowledged by the post holder
 - iv. appointing a deputy who will assume the responsibilities for Sentinel in the main post holder's absence; ensuring the responsibility is acknowledged and accepted.

1.2 Contract of Sponsorship Management

The supplier shall provide evidence which demonstrates arrangements are in place to manage the responsibility of acting as the Primary Sponsor and establishing a 'Contract of Sponsorship' with each individual Sentinel card holder. The arrangements shall include:

- a) A process for:
 - i. establishing a contractual relationship between a primary sponsor and an individual in-line with Sentinel Scheme Rules
 - ii. delivery of an induction briefing which will include as a minimum the rules and responsibilities contained within the Sentinel Scheme Rules
 - iii. performing suitability and capability checks to undertake work on the relevant infrastructure prior to engaging in a contract of sponsorship, and undertaking a review annually or in the event of an incident/accident/identification of poor performance
 - iv. retaining records of contracts of sponsorship for all primary sponsored staff.
- b) Evidence of:
 - i. contracts of sponsorship which defines the relationship between the sponsor and the sponsored
 - ii. recording who sponsored individuals are employed by where they are not employees of the sponsoring organisation
 - iii. issuing of contracts of sponsorship and valid sentinel cards
 - iv. suitability/capability checks are being performed pre-sponsoring, annually and in the event of an incident/accident/identification of poor performance.

2.0 Management Systems

2.1 System Arrangements

The supplier shall provide evidence that demonstrates arrangements are in place to manage its Sentinel Sponsorship responsibilities in compliance with the Sentinel Scheme Rules. The arrangements shall include but not limited to:

- a) A process for:
 - i. implementing and maintaining a management system for Sentinel Scheme Rules compliance which includes:
 - contract of sponsorship
 - pre-sponsorship
 - competence management
 - management of sub-sponsors
 - routine briefings and information cascade processes
 - management of working hours
 - procurement, management, calibration and provision of safety critical equipment
 - provision of personal protective equipment (PPE) and other personal issue equipment
 - management of misconduct events
 - reporting all misconduct events to Network Sentinel Investigations (NWR requirement)
 - misconduct investigations
 - management of records
 - prompt de-sponsoring of individuals
 - membership of an independent and confidential industry reporting service (e.g. NWR and TfL preferred / approved system CIRAS)
 - familiarisation of protection staff with 'complex' areas.
- b) Evidence of:
 - i. an up-to-date compliance matrix / index (ensuring it captures the Sentinel scheme process list detailed above).

2.2 Misconduct Processes

The supplier shall provide evidence that demonstrates the organisation has arrangements in place for dealing with instances of misconduct of sponsored staff. The arrangements shall include:

- a) A process for:
 - i. investigating where any suspected misconduct event becomes apparent
 - ii. collection of information from sub-sponsors to enable a thorough local investigation
 - iii. maintaining all records associated with a misconduct investigation and providing these to Network Rail Sentinel Investigations and Primary Sponsors when required
 - iv. 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 the misconduct process)
 - v. managing an individual during a misconduct investigation, ensuring they are not de-sponsored on the grounds of misconduct without first conducting an investigation and holding a misconduct hearing.

- b) Evidence of
- i. the misconduct process being implemented, ensuring compliance with the Sentinel Scheme Rules and corrective actions have been identified and implemented into the management system (where applicable)
 - ii. trend analysis of misconduct events and taking action where patterns of non-conformity are identified (where applicable)
 - iii. supporting other organisations misconduct investigations (where applicable).

3.0 Supply Chain Management

3.1 Management of Sub Sponsors

Where it is confirmed that sub-sponsoring is allowed, the supplier shall provide evidence that demonstrates arrangements are in place to manage the responsibility of sub-sponsoring. These arrangements shall include:

- a) A process for:
- i. maintaining a list of personnel who are sub-sponsored, the sub-sponsoring organisations and any associated agreements for sharing of labour between the entities
 - ii. maintaining all records associated with any works undertaken by an individual, as is required by the Sentinel Scheme Rules
 - iii. ensuring the necessary insurances are in place for works undertaken by individuals working on their behalf, regardless of their sponsorship arrangements

When Sub-Sponsoring

- iv. requesting permission to use an individual from their Primary Sponsor and receiving confirmation of sub-sponsorship status before resourcing the Individual to work
- v. 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 not limited to:
 - information on working hours, risk assessments put in place, safety incidents, competencies used and competence shortfalls
 - notifying any safety issues or misconduct events as soon as is reasonably practicable
 - providing all other safety related information on request

When acting as Primary Sponsor:

- vi. reviewing and then either approving or rejecting the sub-sponsors request (where rejected, a reason for rejection must be provided)
 - vii. reviewing Sentinel Reports, and analysing usage of sponsored staff by sub-sponsors
 - viii. obtaining information from the sub-sponsor to be able to manage the individual safely
- b) Evidence of:
- i. a controlled list of all sub-sponsored individuals, the organisations contracting with, and the agreements put in place
 - ii. the organisation is maintaining all records associated with works undertaken and is coordinating and communicating with others in the management of sub-sponsored staff, this includes:
 - Sharing information with Primary Sponsors
 - reviewing information provided by sub-sponsoring organisations and taking action where required.

4.0 Human Resources

4.1 Employment medicals

The supplier shall provide evidence that demonstrates arrangements are in place that ensures workers under its control meet and maintain the health requirements as specified in customer / client standards (e.g. NWR or TfL) and Railway Industry Standards. The arrangements shall include:

- a) A process for:
 - i. identifying, reviewing, and carrying out pre-employment medical examinations in-line with the relevant Infrastructure Managers requirements (i.e., NR/L2/OHS/00124)
 - ii. ensuring periodic examinations are being planned and conducted
 - iii. obtaining medical self-certifications for Track Visitor Permits
 - iv. monitoring the fitness for duty of individuals considering:
 - impairment from alcohol and drugs
 - fatigue
 - illness or effects of treatment from illness
 - any condition that has been notified
 - v. occasions when individuals have received a restricted medical status, change of health or taking prescribed medication, ensuring that the organisation seeks advice from a Responsible Physician (where required), determine whether to implement a safe system of work and undertake a risk assessment.

- b) Evidence of:
 - i. the standard NR/L2/OHS/00124 having been reviewed and communicated to the relevant responsible persons
 - ii. an assured provider for medical assessments has been selected and holding the qualified RICCL H.H.4
 - iii. Sentinel is being used to record the results for pre-employment and periodic medical assessments
 - iv. individuals are performing duties in-line with the medical levels assigned
 - v. the sponsor taking the following action where a medical restriction has been applied:
 - review of the medical restrictions that apply and, if required, obtained further advise from a Responsible Physician
 - determined whether it is reasonably practical to implement a safe system of work to allow the individual to hold the competency, having made reasonable adjustment in accordance with the Equality Act 2010
 - conducted a health risk assessment to enable a safe system of work to be implemented
 - vi. where a safe system of work for an individual with restrictions is required, the sponsor has:
 - documented the control measures to be put in place to mitigate the impact of any restrictions
 - informed the individual with the restriction and others responsible for their safety, of the control measures required for a safe system of work
 - implemented and maintained the safe system of work
 - monitored the compliance and efficiency of the safe system of work
 - vii. where there is a change in health condition, or taking any prescription drugs that may cause impairment, the organisation has:
 - identified the activity expectation for the applicable Sentinel competency
 - reviewed the health/prescription changes that apply
 - if required, obtained further advise from a Responsible Physician
 - determined whether it is reasonably practical to implement a safe system of work to allow the individual to hold the competency, having made reasonable adjustment in accordance with the Equality Act 2010.

4.2 Fatigue Management

The supplier shall provide evidence, in addition to 7.2 of the Core Audit Protocol, which demonstrates arrangements are in place for identifying, risk assessing, planning, and preventing the fatigue of all Sentinel Sponsored Individuals under their control. The arrangements shall include (but is not limited to):

- a) A process for:
 - i. collating, reviewing and monitoring the staff 'swipe-in' and 'swipe-out' of Sentinel when working trackside (*NWR requirement*)
 - ii. taking action where the 'swipe in and out' data is identifying a risk from fatigue (considering the last shift/activity performed, travel time and fitness for duty).
- b) Evidence of:
 - i. incorporating sentinel data into the management of fatigue
 - ii. incorporating sub-sponsorship data into the management of fatigue (where applicable)
 - iii. sharing and receiving exceedance risk assessments between sponsors where there has been an exceedance of working hours.

4.3 Alcohol and Drugs Management

This question is to be applied to Sentinel Sponsored Individuals only. Any Infrastructure Management requirement for safety critical roles and key position posts who are not sponsored under Sentinel shall be answered in the relevant CORE Module.

The supplier shall provide evidence that demonstrates arrangements are in place for checking that all Sentinel Sponsored Individuals under its control do not access the rail Infrastructure (e.g., NWR, TfL) while under the influence of alcohol or drugs. The arrangements shall include:

- a) A process for:
 - i. routine, pre-appointment testing - such as pre-employment and following transfer to a post that requires sponsorship on Sentinel
 - ii. accessing and updating arrangements to Sentinel databases for changes to status of sponsored 'Sentinel' employees
 - iii. carrying out a risk-based programme of random testing on all Sentinel Sponsored employees over a rolling 12-month period (percentage in-line with the infrastructure managers requirement)
 - iv. carrying out 'for-cause' testing through an assured drug and alcohol testing provider holding the RICCL H.H.5.1 (ensuing a request is made at the earliest opportunity following accidents, serious incidents or suspected of being unfit through drugs or alcohol)
 - v. establishing a For-Cause contract with an organisation who can ensure a test can be conducted by a qualified collection supplier within 2-hours of a request being made (4-hour within designated remote areas)
 - vi. implementing actions following a failure of a drugs and alcohol test
 - vii. dealing with appeals against drug and alcohol test results
 - viii. retaining records (6 years as a minimum).
- b) Evidence of:
 - i. appointing an approved drugs and alcohol testing provider holding the RICCL H.H.5.1
 - ii. holding a valid for-cause contract which meets the requirements detailed within section 4.3 a)v
 - iii. initial drug and alcohol screening of new sponsors being undertaken and recording the results on sentinel
 - iv. a risk-based programme of random testing in-line with the infrastructure managers requirements (ensuring the testing has been performed sporadically over a rolling 12-month period to ensure the random expectation of the requirement)

- v. actions have been taken where there has been a positive random test
- vi. checking fitness when booking on for duty - signed declarations (TFL Requirement Only).