



RAILWAY INDUSTRY SUPPLIER  
QUALIFICATION SCHEME

## RISQS Audit Report

<b>Audit ID</b>	902ce49f-9917-4b62-82f6-7e9efac8bf83
<b>Supplier Name</b>	Traction Rail Electrical Limited
<b>Supplier ID</b>	4947
<b>Auditor ID</b>	P10440956
<b>Audit Date(s)</b>	07/05/2019 to 09/05/2019



**RAILWAY INDUSTRY SUPPLIER  
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**Audit Details**

The RISQS Scheme audit for Traction Rail Electrical Limited took place between 07/05/2019 and 09/05/2019 and consisted of IMR Sentinel.

The audit was undertaken at:

144 Bourne Vale  
Bromley  
BR27NZ

**Audit Scope**

<b>Initial audit</b>	N
<b>Periodic audit</b>	Y
<b>Additional audit</b>	N
<b>Condensed IMR for 5* Suppliers</b>	Y
<b>Re-audit following failure</b>	N

**Executive Summary**

This was Traction Rail Electrical Limited renewal audit against the Industry Minimum Requirements and Sentinel modules. The audit process has resulted in the issue of 1 Positive element and no non-conformances or observations.

Traction Rail Electricals scope of services included;

- Full GRIP 3-5 ETE Outline Design to Detailed Design, including CMS and minor civil/route work.
- Encapsulating the elements required for post IDC/IDR and into the construction phase.
- Providing ETE and HV engineering support for clients as construction CRE for one off jobs up to projects which require full life cycle support. Engaging with designers, project planners, commercial, engineering, client representatives and stakeholders.
- Produce Staged CTDs, Section proving documents, ITPs, Investigative reports, feasibility studies and As built information for the production of hardback documentation.
- Providing robust HV assessments, and HV competent persons to support clients, projects and one off jobs.
- Project support including access planning, Commissioning strategy, Deconfliction meetings, Readiness reviews, Tendering process and Liaising with the Client.

The documentation included an Organisation Chart depicting the company structure. The company had developed documented job descriptions for key roles which have been briefed to the post holder and signed off with deputy arrangements in place.

Competent Health, Safety, and Environmental support are provided by an external rail consultant with a contract of engagement in place. The consultant was a Technical member of IOSH and had extensive experience assisting clients with RISQS compliance by producing appropriate management system policy and procedure documentation.

A document control procedure was in place and the company had access to Network Rail Standards, TfL QUENSH Standards and Railway Group Standards, demonstrated at the time of audit.

Processes were in place for establishing a Contract of Sponsorship with each individual Sentinel Card Holder in line with the requirements set out within the Sentinel Scheme Rules. Sub-sponsorship processes were in place and the company demonstrated agreements in place with sub-sponsors.

The company had a suite of policies in place including a Drugs and Alcohol and Working Hours policy and procedure in place.

Sentinel Scheme Rules had been acknowledged within the company arrangements and a current 'For Cause' contract was in place with a RISQS approved supplier for drugs & alcohol testing. The company had also carried out the required 5% annual unannounced testing for drugs & alcohol on sponsored staff.

Arrangements were in place for the management of Refusals to Work on the Grounds of Health & Safety. A policy was available and had been provided to operatives as a part of the induction process. The policy included a declaration that confirmed that persons invoking the procedure were protected from any associated disciplinary action. The company demonstrated membership to an independent reporting service - CIRAS.



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The company has an approved supplier list which is broken down covering all areas in regard to the scope of the business, including all safety critical items, which is well laid out and includes all relevant accreditations/licences which are required for work on the infrastructure.

PPE was identified through the risk management process and issued to personnel free of charge with replacement equipment available on request. Recipients were required to signature acknowledge receipt. Status and wearing of equipment were reviewed as a part of site inspections.

Traction Rail Electrical had documented arrangements in place which detailed the process for the identification of hazards associated with its activities and the introduction of control measures to mitigate risk.

The company had procedures established for the control and management of Environmental risks including Environmental Aspect and Impacts register and a current Environmental Policy Statement endorsed by the Managing Director.

A competency matrix in conjunction with the Sentinel database was in place to ensure on-going competence management, with underlying processes to support the records.

The company had a detailed business continuity procedure and plan in place covering all potential areas of disruption to the company. It was demonstrated that all areas of the plan had been effectively tested in the previous 12 months.

The company had documented arrangements in place for accident and incident reporting and investigations and had in place nominated persons for RIDDOR reporting. No RIDDOR events had been reported on rail infrastructure project works in the last 12 months.

Traction Rail Electrical Limited had procedures in place for management of plant and equipment. The company use an App [Sortly] for electronic management of its equipment inventory. It is a visual asset tracking system that allows you to add multiple photos of each item, along with any item details [calibration expiry etc], for a more intuitive way to keep track of your inventory across multiple locations. It allows Traction Rail to create or connect QR labels and barcodes to check-in/out items using built-in scanner. The inventory is displayed on desktop, tablet or mobile which the workforce have access to. This was seen to be over and above the requirements of the scheme, resulting in a positive element being raised within this section.

In conclusion, a pass recommendation is to be made for this audit for the Industry Minimum Requirements and Sentinel modules.

### **Audit Findings**

## Positive Elements

IMR - 7.1

The organisation had a procedure in place covering the management, maintenance, and servicing of plant and equipment in the following documented procedure:

- 7.1 Inspection, Maintenance, and Calibration

The procedure contains the processes to be followed for the control of any plant and equipment and included servicing, maintenance and calibration to ensure the plant and equipment is fit for purpose. All Traction Rail Electrical equipment is allocated with a unique identification number, and registered on a full inventory. Inspection schedules and manufacturers guidance will be used to determine the inspection / maintenance / calibration requirements for each item of equipment. The company have a register and utilise an App [Sortly] which was demonstrated and showed electronic management of the equipment inventory, which consisted of Transformers, Drills, Hydraulic Crimping Equipment and Electrical Meters etc. The asset database demonstrated that the plant and equipment had been given a unique company ID number, listed serial number, current and next inspection status, issued to and date and QR Code. The file containing calibration certificates was sampled against the data held on the App and the certificates were recorded as current.

The company stated that it did not have any plant or equipment that requires thorough examination and all electrical tools are PAT tested with evidence provided. Quarantine arrangements involved damaged plant returned to stores and suitably labelled and stored in quarantine area until repaired or disposed of.

Evidence:

- Certificate of Calibration - Megger Digital Low - Serial No. 101602245 - Calibration date 22/05/18
- Certificate of Calibration - Torque / Angle Wrench - Serial No.0318802874 - Calibration date 15/03/19
- Certificate of Calibration - Live Line Tester - Certificate No. SEA6845/SO/1 - Calibration date 22/05/18
- PAT Testing Register dated 04/06/19

Positive Element - The company use an App [Sortly] for electronic management of its equipment inventory. It is a visual asset tracking system that allows you to add multiple photos of each item, along with any item details [calibration expiry etc], for a more intuitive way to keep track of your inventory across multiple locations. It allows Traction Rail to create or connect QR labels and barcodes to check-in/out items using built-in scanner. The inventory is displayed on desktop, tablet or mobile which the workforce have access to.

## Assessment Requirements



**RAILWAY INDUSTRY SUPPLIER  
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**Management Control [IMR - 1]**

Management Structure [1.1]

The management structure is defined including:

- Evidence of current organisational structure identifying key managerial posts such as health, safety, quality, environmental, technical 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 and signed by the post holder;
- Evidence that deputies or alternative arrangements are in place for key roles.

An organisational chart was in place that depicted the following roles:

- Managing Director
- Administrator
- Professional Head of Engineering
- Rail Manager
- Health & Safety Rail Consultants - 4Rail Consultant
- Sentinel Co-coordinator
- Sponsored Staff

Job descriptions were held for key positions and had been briefed and accepted by the post holder. The job descriptions included deputy arrangements. The following were sampled:

- Managing Director [ML] - signed dated 09/03/19 [Deputy DL];
- Sentinel Coordinator [ML] - signed and dated 09/03/19 [Deputy DL];
- Rail Consultants [TP] - signed and dated 09/03/19;
- Professional Head of Engineering [DS] - signed and dated 09/03/19 [Deputy JR]

It was verified there are suitably qualified personnel for the services provided. The CV was seen for the Managing Director [ML] who held the following competencies;

- BTEC Higher National Certificate [Electrical and Electronic Engineering]
- BTEC National Certificate [Electrical and Electronic engineering]

Notable projects the Managing Director has been involved with include;

- New Cross Gate Depot - Managing Design, installation and handbooks.
- IP Southern Projects DNO supply - GRIP Stages 3-8. Including project, operational and commercial reviews, internally and with the Client.
- Reading 10 Car Substation Design and Construction - Grip stages 4-8. Tendering process for various stages of works, creating and managing programme costs, managing design process including subcontractors, procurement of substation electrical equipment. Collaborative working with Client and liaison with stakeholders.

The CV was seen for the Project Engineer [JR]. Competencies included;

- BSc Degree - Construction and the Built Environment
- HND - Construction and the Built Environment
- HND - Construction and the Built Environment
- ONC/BTEC Level 3 - Construction and the Built Environment

Notable experience the Project Engineer has been involved with include;

- ETE Design for CRE for enhanced substation negative return arrangements.
- ETE Construction CRE for Thameslink Resilience Programme ETE Asset Assessment.
- Interdisciplinary Check Attendances and technical contribution to the safe and efficient GRIP 5 Designs.

Fully Compliant

**Management Control [IMR - 1]**

Health & Safety Competent Support [1.2]



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The company had adequate arrangements in place at the time of audit in respect of provision of competent health and safety support to manage the work activities identified within the company's profile. The company engaged the services of an external consultancy [4Rail]. A contract of engagement was place with an expiry of 10/06/19. The services provided included the following;

- Provide rail specific safety advice and advice on the rail manual;
- Provide regular rail safety and general health and safety newsletters and bulletins;
- Provide on request from RJG Rail Ltd expert H&S advice which can be obtained from 4Rail H&S Manager;
- Carry out at least 2 audits of the rail manual annually and provide a report and assist with remedial actions if necessary.

The CV of the Rail Health and Safety Manager /Consultant [TP] was presented along with qualifications and professional memberships. The CV demonstrated extensive experience assisting clients with RISQS compliance by producing appropriate management system policy and procedure documentation. Competencies included;

- Technical Membership IOSH 105\*\*\* expiry 31/03/20
- NEBOSH National General Certificate C92\*\*\* awarded 24/05
- Associate Membership Certificate for IIRSM dated 07/10
- IEMA Membership No. 0049\*\*\* expiry dated 23/02/20
- Lead Auditor OHSAS 18001, ISO9001 dated 08/04/05

Fully Compliant

**Management Control [IMR - 1]**

Management of Legal and Other Requirements [1.3]

Appropriate arrangements for the management of legal and other requirements were recorded in the documented procedure:  
• 1.3 Management of Legal and Other Requirements

The document was seen to include the process for the identification, procurement and control of documentation external to the company and identified the source of supply for Railway Group Standards from RSSB and Network Rail Standards via the Rail Consultant who held a subscription to IHS On-line that included access to London Underground Standards. The procedure had an associated Master List of External Documents Register which made provision for the following:

- H&S Legislation
- Environmental Legislation
- Network Rail Standards
- Railway Group Standards
- LUL / TfL Standard
- Handbook Modules.

Responsibility for the review and dissemination of changes to standards was confirmed and was undertaken by the organisation's consultancy who undertook a quarterly Standards review. H&S and Environmental updates are provided through subscription to Government websites such as HSE, IEMA and Environment Agency. When changes in legislation and Standards cause the company to change its procedures and processes, it would carry out briefings/toolbox talks to staff to ensure that relevant personnel were aware of any changes that had been made. The latest update of Network Rail Standards Reference List [March 2019] had been maintained by the Rail Consultant and was verified at the time of audit. Evidence of briefings conducted following communication from the Rail Consultant were sampled with the following evidence recorded;

- Operative [DJ] Handbook Modules / Generic Risk Assessment / COSHH - sent via email 25/10/18
- Operative [GH] COSHH / generic risk assessment / PTS Guides and Hand book module - sent via email 30/11/18

The company provided evidence of changes to documents recorded utilising a Document Change / Issue Request. It was noted throughout review of procedures during the audit that all changes contained within the Document Change / Issue Request had been completed.

Fully Compliant

**Management Control [IMR - 1]**

Compliance with CDM Regulations 2015 [1.4]



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The organisation acted as a contractor and demonstrated mechanisms for communication and co-operation with others to ensure the safety of all personnel. Arrangements were contained within the following procedure:

- 1.4 Compliance with CDM Regulations 2018

The procedure required that suitable information is distributed throughout the organisation in a timely manner to all individuals affected and to ensure that effective communication is also undertaken with Clients. The company is aware of the main duties of a contractor which they would be expected to uphold whilst working as a contractor. The company demonstrated mechanisms for planning, managing and monitoring construction work under their control so that it is carried out without risks to health and safety and ensuring that adequate resources are available to satisfy the work requirements. The procedure included that when working as a 'Designer' they would always work under Network Rail as the Principal Designer.

The company representatives present at the audit demonstrated knowledge of CDM Regulations and specific roles associated with the regulations stated and would brief the workforce where necessary.

The company also had a documented procedure in place titled Risk and COSHH Assessments [2.1] and Communication [2.7] which detailed the process for documenting and communicating safe systems of work and the requirement to ensure the company's compliance with the Management of Health & Safety at Work Regulations, the CDM Regulations 2015 and relevant Network Rail Standards.

Evidence:

- Examples of project documentation was provided as follows;
  - Work Package Plan produced by Traction Rail Ltd - New Cross Gate - ETE Works and Duct Relining date 31/12/18;
  - Task Briefing Sheet - Wessex Controlled Switch [CTS] Briefing [CTS ETE Works] - briefed to 4 operatives dated 12/18;
  - Task Briefing Sheet - Water Pumping Briefing - briefed to 2 operatives dated 04/08/18;
  - Task Briefing Sheet - Intrusive Survey briefing - briefed to 2 operatives dated 04/08/18;
  - Task Briefing Sheet - Cable Pulling - briefed to 9 operatives dated 26/01/19.
  - Work Package Plan produced by Traction Rail Ltd - Phase 1 CMSD Safer Isolation [Client Kier] dated 13/03/19;
  - Task Briefing Sheet - Phase 1 CMSD Faster Isolation Removal of Hook switches and the Installation of DC Track Feeders via Direct Terminations - briefed to 2 operatives dated 17/03/19.

Fully Compliant

**Management Control [IMR - 1]**

Management Systems [1.5]



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The company operated an integrated management system which included;

- Policies
- Procedures
- Standard Forms

The company was not accredited to an external organisation, however, the management system was aligned to meet the requirements of the RISQS Industry Minimum Requirements and Sentinel protocols. The company had the following procedure in place:

- 1.5 Management Review and Validation of Change

The procedure states that to ensure continual improvement and compliance with legal and statutory requirements the company will perform a management review at least once a year. This is to ensure the processes relating to work on the railway infrastructure are reviewed, and any actions that could improve performance are identified. Validation of Change process provides assurance that any new risks or any potential increase in existing risk that is introduced by the change have been identified, assessed and controlled to a level which is as low as reasonably practicable.

The Rail Manual outlined the details of all company processes which included provision of Rail Related documentation. The scope and structure of the management system which included all policies, manuals, plans, procedures, forms and referenced to the issue number and date, and was held in electronic copy by the company. Rail Manual was on Issue 4 last reviewed 09/03/19.

Evidence:

- Management Review last undertaken 15/02/19. The review was attended by the management team and the agenda was seen to include;
  - Follow up actions
  - Review of policies and procedures
  - External audit results
  - Internal audit results
  - Client feedback
  - Approved Supplier list
  - Process Performance and Product Conformity
  - Status of non-conformance / preventative and corrective action
  - Safety related issues / information regarding Accident / Incidents Occurrence & Reporting
  - Quality related issues
  - Environmental Related Issues
  - Training and competency undertaken and effectiveness
  - Changes to the management system
  - Review of Improvement plan

Fully Compliant

**Management Control [IMR - 1]**

Policy Control [1.6]



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The company demonstrate, to employees and other affected parties, the company's top level management commitment to Safety, Health, Environment and Quality requirements by having the following policies available and displayed in the premises:

- Health and Safety Policy - signed and dated 09/03/19
- Environmental Policy - signed and dated 09/03/19
- Quality Policy - signed and dated 09/03/19
- Accident / Incident / Near Miss / Close Call Reporting Policy signed and dated 09/03/19
- Medical Fitness Policy - signed and dated 09/03/19
- First Aid Policy - signed and dated 09/03/19
- Fire Policy - signed and dated 09/03/19
- Safe Driving at Work Policy - signed and dated 09/03/19

The policies meet UK legislative requirements, are endorsed by the Managing Director and are briefed during Induction or when any changes had been implemented. Induction packs were randomly sampled from the workforce. The following were recorded:

- Operative [LW] Rail Induction signed and dated 01/02/18
- Operative [CH] Rail Induction signed and dated 21/03/18
- Operative [DJ] Rail Induction signed and dated 25/10/17
- Operative [LD] Rail Induction signed and dated 06/12/17
- Operative [SA] Rail Induction signed and dated 01/11/17
- Operative [MW] Rail Induction signed and dated 26/02/18

The company maintained a Staff Matrix Policy which captured the dates of briefings to its workforce. For example;

- Operative [JR] Driving policy briefed and signed off 26/04/18;
- Operative [DS] All policies briefed and signed off 20/03/18.

Fully Compliant

### **Management Control [IMR - 1]**

#### **Document Control [1.7]**

Appropriate arrangements for Document Control were recorded in the following procedure:

- 1.7 Document Management

The procedure identifies key documents that require control. Documents that were deemed to be controlled by the company were recorded on the Document Control Register and included;

- Policies
- Procedures
- Standard Forms
- Rail Standards
- Legislation
- Industry Specific Documentation

The process covers Document Approval, Document Revision, Obsolete Documentation, Identification, Archiving and Retention periods. A Master Document Index is used to identify the latest issue of controlled documents. It is the responsibility of the company to maintain the controlled document files. The register included details such as: document reference, identification numbers, document titles and issue date. The register was seen to include all company policies, procedures and forms relevant to managing business activities appropriate to its scope of works. Sharepoint was utilised by the external consultancy and the organisation, whereby any updates to standards, legislation, company and group standards were seen to be uploaded onto this system. Key policies are reviewed annually as a minimum and if anyone identifies a requirement to change the policies, procedures or forms, a process and a form will be compiled for use for the notification of change.

The organisation controls the issue of drawings to specialist functions and construction functions/organisations.

Evidence:

- Traction Rail Electrical Transmittal Note - Transport for London Document Title New Cross Depot DC Track Feeder Renewal Design Statement - Date of submission 24/08/18.

Fully Compliant



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## Management Control [IMR - 1]

### Monitoring [1.8]

The company had the following procedures in place to support the proactive and reactive monitoring of their own performance.

- 1.8 Site Inspections
- 1.5 Management Review and Validation of Change

Within these documents the procedure sets out the requirements for a company representatives carrying out site inspections upon Network Rail Managed Infrastructure. This procedure also defines the management review process, its objectives, inputs and outputs. The arrangements in place and the evidence verified the following:

- That the management systems are assessed internally on a regular basis by competent personnel;
- That a documented audit schedule is prepared. The company demonstrated schedules for Site Inspections, Internal and External Audits;
- Internal audit reports are available and corrective actions raised through the internal audit process are recorded electronically and the company has a managed process for the control of corrective actions including identifying and closing out corrective actions in a timely manner;
- During the inspection process, the company ensures on-site personnel are executing their duties in a safe manner. The company provided evidence in the form of Site Inspection Reports;
- The company demonstrated that it holds Annual Management Review Meetings.

### Evidence:

- Audit Plan 2019 recorded the following to be completed;
  - RISQS Audits
  - Internal 4rail Reports
  - Site Audits
  - Review Risk Assessments
  - Review Policies
  - Management Review
- Management Review last undertaken 15/02/19. The review was attended by the management team.
- The company had completed monthly site audits with evidence of the following site audits undertaken;
  - Sponsored Person Audit - Operatives [CH, DJ, PI, MW, HA] dated 04/01/19
  - Site inspection - Malden - completed by [ML] dated 11/03/19
  - Site inspection - Sussex - completed by [ML] dated 17/03/19
  - Site inspection - IPSS Works - completed by [ML] dated 30/03/19
  - Site inspection - Salford to Gatwick - completed by [JR] dated 24/02/19

Fully Compliant

## Management Control [IMR - 1]

### Design Management and Control [1.9]



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It was verified the company had adequate controls in place to manage the design process within the organisation. Supporting this process the company had the following documented procedure in place:

•1.9 Design Management and Control

The arrangements identified the process to manage the Design Requirements and included processes as found within the procedure process and Design Management Control Flowchart.

The management of change process is identified within 1.7 Document Control Procedure. The company has identified applicable Network Rail Standards on the Standards register which may be required for design projects. Traction Rail Electrical [TRE] can produce ETE design documentation from NVQR Grip Stages, Outline Design / Feasibility to detailed design, for upgrade and enhancement schemes including but not limited to the following areas;

- Substation / TP Hot DC Track Feeder Cable Renewals
- Open Route Cable Doubling
- Isolating Switch Enhancements [CT's, TD's TFD's]
- Negative Bonding Enhancements

TRE also provide Design and Construction Contractors Responsible Engineers [CRE] for all internally produced designs, such as New Cross Gate Depot, Leatherhead and substation and Redhill Station. TRE ensure all projects where the CRE role is required to be managed internally in line with Network Rail Standards. In order to produce accurate and compliant ETE designs a number of internal processes are required to be followed, as well ensuring external responsibilities are met to ensure the design procedure for ETE Designs as per Network Rail Standards.

The arrangements in place and the evidence provided covered the following:

- That the organisation can provide evidence of acting as designer and coordinating designs;
- That the organisation has a process to ensure design interfaces are thoroughly reviewed;
- There is a documented process for submission of designs (Including revision status, change process etc);
- That the organisation reviews to ensure designs are correct and manages modifications after the design has been issued.

Evidence:

- Redhill 'A' and Redhill 'B' substation Negative Reinforcement ETE Works GRIP 5 - Design Statement [CP5 Sussex PSE]
- Design Document Verification completed by [JR] - ETE Designer dated 17/08/18;
- Checker - [ML] ETE Engineer dated 17/08/18;
- Approver - [AD] Contractors Responsible Engineer dated 17/08/18.

Contents were seen to include;

- Designers Risk Assessment Analysis - Electrical Track Equipment [ETE]
- Acceptance of Detailed Design - Sussex PSE
- Inter Disciplinary Check
- Combined Interdisciplinary Check & Interdisciplinary Review Certificate dated 29/06/18 [signed off by 6 operatives including Traction Rail Electrical ETE Designer dated 29/06/18.

Fully Compliant

**Management Control [Sentinel - 1]**

Management Structure [1.1]



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Designated persons responsible for the management of Sentinel sponsored personnel and the management of sponsorship within the

Sentinel scheme were defined within the documented organisation chart and responsibilities were captured within the appropriate job descriptions. The nominated persons were noted as:

- Sentinel Coordinator [ML] - signed and dated 09/03/19 [Deputy DL];

Sentinel responsibilities included;

- Understand the Rail Manual and Network Rail Standards;
- Ensure all staff with a PTS competency or above receives pre-employment medical and alcohol and drugs tests;
- Arrange random A&D tests. Ensure RISQS approved suppliers are used;
- Ensure that staff who hold IWA and COSS competency or above receive competence assessments to the required frequency;
- Maintain local staff records;
- Maintain a H&S filing system;
- Ensure new staff receive appropriate induction documentation prior to commencing work and that relevant documents are returned and filed;
- Ensure all staff have completed a PPE issue form.

The designated persons CV was viewed and demonstrated extensive experience in the rail industry and Sentinel database.

Fully Compliant

**Management Control [Sentinel - 1]**

Management Systems [1.2]

It was verified documented procedures within the Organisation's Management System contain processes for the management of;

- Routine Briefings and Information Cascade Processes - Procedure reference 2.7 Communications and Coordination
  - Pre-sponsorship - Procedure reference 6.1 Induction
  - Contract of Sponsorship - Procedure reference 8.2 Contract of Sponsorship
  - Management of Sub sponsors - Procedure reference 8.3 Management of Sub sponsors
  - Competence Management - Procedure reference 6.2 Competence Management
  - Management of Working Hours - Procedure reference 8.6 Fatigue Management
  - Provision of PPE and other personal issue equipment - Procedure reference 2.4 Personal Protective Equipment
  - Procurement, management, calibration and provision of safety critical equipment - Procedure reference 7.1 Plant and Equipment
  - Management of Misconduct Events - Procedure reference 8.4 Management of Misconduct
  - Misconduct Investigations - Procedure reference 8.4 Management of Misconduct
  - Management of Records - Procedure reference 1.7 Document Control
  - De-sponsoring of Individuals - Procedure reference 8.2 Contract of Sponsorship Management
- Membership of an independent and confidential industry reporting service was in place as follows;
  - CIRAS Certificate of Membership - No. C1591 Valid until 31/03/20 Company Registration No. 8371909

Fully Compliant

**Management Control [Sentinel - 1]**

Policy Control [1.3]



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The company had a documented Drugs and Alcohol Policy in place which detailed its arrangements within this area. The policy was seen to be in compliance with RIS-8070-TOM. The policy covered all aspects of the business and was endorsed by the Managing Director.

- Alcohol and Drugs Policy - signed and dated 09/03/19.

The company also demonstrated that it had a Working Hours Policy which had identified the specific arrangements for the management of fatigue in line with Network Rail and LU requirements. The policy covered all aspects of the business and was endorsed by the Managing Director.

- Working Hours Policy - Signed and dated 09/03/19.

Evidence:

- Policies are displayed within the premises of the company and are endorsed at top level management. Policies are briefed as part of the induction process. The following induction packs were randomly sampled from the list of sponsored staff and recorded :

- Operative [LW] Rail Induction signed and dated 01/02/18
- Operative [CH] Rail Induction signed and dated 21/03/18
- Operative [DJ] Rail Induction signed and dated 25/10/17
- Operative [LD] Rail Induction signed and dated 06/12/17
- Operative [SA] Rail Induction signed and dated 01/11/17
- Operative [MW] Rail Induction signed and dated 26/02/18

Fully Compliant

### **Safety Risk Management [IMR - 2]**

#### Health and Safety Risk Controls [2.1]

Appropriate arrangements for health and safety risk assessment were confirmed recorded in the documented procedure:

- 2.1 Risk and COSHH Assessments

The procedure outlines the process for the company undertaking Risk Assessments required in accordance with UK Legislation and Industry Requirements. This procedure detailed the process for the production of risk assessments and the methodology to be used for the identification of risk levels undertaken by the Managing Director and Rail Consultant. The procedure required the use of a 5 X 5 matrix and a calculation of likelihood and severity. A risk analysis and ranking process had been established looking at risk prior to controls, implementation and review. The Risk Assessments included identifying who would be harmed, the potential hazardous event, control measures already in place, any additional control measures needed to ensure that additional Risk Assessments if required were carried out and quantifying the residual risk. Each project detailed site specific requirements using a risk assessment template and reviews would be undertaken by the client. Competency of compiling a risk assessment is defined in the procedure.

The external consultancy has produced a Hazard/Risk Assessment Register for Work Upon UK Rail Infrastructure. The Risk Assessments were available on the company 'Sharepoint' and last reviewed 03/01/19. The risk assessments are briefed through the Induction process. The generic risk register was seen to include but not limited to;

- Site Access
- Working / driving excessive hours
- Lone Working
- Site Working
- Emergency evacuation
- Work at Height
- Extreme Weather

Fully Compliant

### **Safety Risk Management [IMR - 2]**

#### Control of Substances Hazardous to Health [2.2]



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Appropriate arrangements for Control of Hazardous Substances to Health [COSHH] were confirmed recorded in the documented procedure:

- 2.1 Risk and COSHH Assessments

The procedure sets out the arrangements to ensure that the company undertakes its activities in a safe manner and that all substances associated with its activities are identified and suitable control measures are implemented. COSHH Assessments would be incorporated into the Work Package Plans and Construction Phase Plans. The company maintained a COSHH register and supporting Safety Data Sheets held on file. All assessments are available on the company 'Sharepoint'. Briefing of COSHH arrangements would be part of the induction process and prior to commencement of works.

Evidence:

- COSHH Assessment Forms sampled for;
  - Hydraulic Oil - dated 28/12/18
  - Universal Electrical Paste - dated 28/12/18
  - 2T Universal Two Stroke Oil - dated 28/12/18
  - Diesel - dated 28/12/18
- Briefing Register dated 04/01/19 verified briefing to 10 operatives to confirm briefing of COSHH and Generic Risk Assessments.

Fully Compliant

**Safety Risk Management [IMR - 2]**

Implementation of Risk Controls [2.3]

The arrangements in place and the evidence seen during the audit covered the following:

- That where method statements are produced, risk assessments are incorporated or referenced;
- That the responsibility for implementation of these arrangements has been allocated to competent persons including the Managing Director as appropriate;
- That the risk controls identified within the company's processes have been communicated throughout the company.

Communication of risk assessments and method statements is through; Construction Phase Plan (CPP), Safe Work Packs (SWP), Work Package Plan (WPP's), Method Statement, Task Briefing Sheets and individual risk assessments. The details of relevant risk assessments are briefed by the Project Manager to staff involved in the work process. Records of the briefing are held within the project folders.

The following briefings were evidenced;

- Task Briefing Sheet - Wessex Controlled Switch [CTS] Briefing [CTS ETE Works] - briefed to 4 operatives dated 12/18;
- Task Briefing Sheet - Water Pumping Briefing - briefed to 2 operatives dated 04/08/18;
- Task Briefing Sheet - Intrusive Survey briefing - briefed to 2 operatives dated 04/08/18;
- Task Briefing Sheet - Cable Pulling - briefed to 9 operatives dated 26/01/19.
- Task Briefing Sheet - Phase 1 CMSD Faster Isolation Removal of Hook switches and the Installation of DC Track Feeders via Direct Terminations - briefed to 2 operatives dated 17/03/19.

Control measures are monitored and reviewed on a regular basis by personnel who understand the work being assessed.

Examples were seen during the audit of site inspections carried out at the company's sites of work as follows;

- Site inspection - Malden - completed by [ML] dated 11/03/19
- Site inspection - Sussex - completed by [ML] dated 17/03/19
- Site inspection - IPSS Works - completed by [ML] dated 30/03/19
- Site inspection - Salford to Gatwick - completed by [JR] dated 24/02/19

Fully Compliant

**Safety Risk Management [IMR - 2]**

Personal Protective Equipment [2.4]



**RAILWAY INDUSTRY SUPPLIER  
QUALIFICATION SCHEME**

The organisation had arrangements for the issuing, checking and monitoring of Personal Protective Equipment (PPE) documented within its procedure:

- 2.4 Personal Protective Equipment

The arrangements included issue at induction and following loss or damage and that PPE is provided free of charge to employees. The procedure details type of protection, requirement for Network Rail and TfL. The procedure records the Standard of PPE required for Safety Helmet, Footwear, Hi-visibility clothing, Gloves (Cut Level 5 general purpose) and ear defenders (if applicable). The company keeps a record of all PPE issued, the date of issue and the expiry date based on date of manufacture if relevant. The register included issue of 1st and 2nd issue. Records are maintained in personnel files.

Evidence:

- PPE issue forms were sampled in induction packs and the following recorded;
  - Operative [LW] dated 01/02/18
  - Operative [CH] dated 21/03/18
  - Operative [DJ] dated 25/10/17
  - Operative [LD] dated 06/12/17
  - Operative [SA] dated 01/11/17
  - Operative [MW] dated 26/02/18

Items issued included;

- Body warmer
- HV Vest - [EN471 Class 3]
- HV Wet weather [EN471 Class 3]
- Flame retardant overalls
- Safety footwear

Fully Compliant

### **Safety Risk Management [IMR - 2]**

Refusal to Work on the Grounds of Health and Safety (Work Safe) [2.5]

Appropriate managing refusals to work on the grounds of health and safety arrangements were recorded in the following documents:

- 2.5 Refusal to Work Procedure
- Refusal to Work Policy

The procedure and policy confirmed that 'No disciplinary action will be taken against any individual who uses the refusal to work procedure because they genuinely believe they are in danger'. The procedure contained a cascade procedure detailing the arrangements for the lines of reporting and references CIRAS and its role which the company demonstrated that it holds current membership to.

- CIRAS Certificate of Membership - No. C1591 Valid until 31/03/20 Company Registration No. 8371909

Company policies are endorsed by the Managing Director and communicated to workers as part of the induction process. The Induction Pack was seen to include reference to the 'Work Safe policy' dated 09/03/19. A sample of induction records was viewed during the audit as follows:

- Operative [LW] Rail Induction signed and dated 01/02/18
- Operative [CH] Rail Induction signed and dated 21/03/18
- Operative [DJ] Rail Induction signed and dated 25/10/17
- Operative [LD] Rail Induction signed and dated 06/12/17
- Operative [SA] Rail Induction signed and dated 01/11/17
- Operative [MW] Rail Induction signed and dated 26/02/18

Fully Compliant

### **Safety Risk Management [IMR - 2]**

Welfare Arrangements [2.6]



**RAILWAY INDUSTRY SUPPLIER  
QUALIFICATION SCHEME**

The company's arrangements for ensuring that adequate welfare facilities are provided for personnel under their control are contained within procedure:

- 2.6 Welfare Arrangements

Where applicable, Traction Rail Electrical Ltd will ensure that the provision of adequate facilities will encompass the following;

- Location and size of the site;
- Number of people involved in the works [including any sharing parties working in accordance with Network Rail Standard NR/L3/INI/CP0036 - Provision of Welfare Facilities].

For every work site [not a transient work site] Traction Rail works upon, an assessment is made as to the requirements in regards to Health & Welfare arrangements [Appendix A from NR/L3/INI/CP0036].

- Category A - Transient Site
- Category B - Transient B
- Category C - Non Transient Site

The company would generally work in accordance with the PC/Clients requirements and attend site task briefings where welfare arrangements would be briefed. The company carried out site briefings and attended site inductions held by the PC/Client and detailed arrangements within the WPP and TBS prior to works commencing.

Evidence:

- Work Package Plan - Thames link Resilience Asset Programme [TLRAP] - dated 23/01/19.
- Section 6.3 Welfare - Mobile Welfare located at Horley Station briefed to 4 operatives dated 27/01/19

Fully Compliant

### **Safety Risk Management [IMR - 2]**

#### **Communication and Coordination [2.7]**

The company has 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 Regulations and any other relevant statutory duty. The arrangements were contained in the following procedure:

- 2.7 Communication and Co-ordination

The arrangements and evidence sampled confirmed that the company would communicate via Meetings, Inductions, Briefings, Toolbox Talks, Informal discussion, Email, and in hard copy via; Notice Boards, Handbooks, Works Package Plans and Task Briefings. The processes ensured that suitable information would be distributed in a timely manner to all individuals affected and ensured that effective communication would be undertaken with clients and other persons affected by works.

The organisation had documented arrangements in place for the management of policy statements, which included communication to the workforce at inductions following a company induction. To promote a campaign of ongoing information the company demonstrated communicating H&S information to the workforce as follows;

- NRB 20/21 Electrical Fire - staff injury dated 20/11/18
- NRA 1902 Long Portable Earths for 25kva OLE Isolations - dated 06/02/19
- NRB1903 Person struck by falling over head wire dated 27/02/19
- A tool box register was in place which are periodically briefed to the workforce. Samples were evidenced as follows;
- Asbestos on site dated 03/01/19 signed by 4 operatives
- Cable pulling dated 13/11/18 signed and dated 7 operatives

Evidence:

- Briefings through WPP,'s / Task Briefings for project works undertaken over the last12 months;
- Communication of Network Rail Standards / Company Rail Standards;
- Project meetings with Client
- Management Review Meeting
- Safety Bulletins & Tool Box Talks
- Induction briefings including all pertinent policies and procedures

Fully Compliant

### **Safety Risk Management [Sentinel - 2]**



**RAILWAY INDUSTRY SUPPLIER  
QUALIFICATION SCHEME**

## Personal Protective Equipment [2.1]

The company has the following procedure for, and records supporting, the issue and management of rail specific 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:

### • 2.4 Personal Protective Equipment

The arrangements included details of the issue of PPE at induction and following loss or damage and that PPE is provided free of charge to employees. The procedure details arrangements for managing PPE, including risk assessments for its issue. Traction Rail Ltd will always supply the contracted minimum contract requirements for work on Network Rail free of charge which includes Network Rails all orange clothing policy. The Sentinel coordinator keeps a record of all PPE issued, the date of issue and the expiry date based on manufacture if relevant (hard hats etc). The arrangements include the requirement of new PTS staff to wear Blue helmets while they hold a green square on their PTS card. The document details the Network Rail Approved PPE including the Standard and type for example;

- Gloves [Cut 5]
- Safety Helmet [EN397]
- HV Vest [BS ENISO 20471:2013]
- Ear Defenders [EN352-1]
- Eye Protection [EN166.1F]
- HV Wet Weather Clothing [EN471- Class 3]
- HV Wet Weather Bottoms [EN471 Class 1]

Site inspections are completed by the company which would check the condition of PPE. Inspection reports were verified with evidence documented in this report.

Fully Compliant

## **Environmental Management [IMR - 3]**

Environmental Risk [3.1]



**RAILWAY INDUSTRY SUPPLIER  
QUALIFICATION SCHEME**

The company representative provided evidence of an Environmental Policy dated March 2019 which was endorsed by the Managing Director.

This policy contained a clear commitment to;

- Minimising the use of energy, water and other natural resources;
- Minimising waste and identify the best environmental option for disposal;
- Considering the effect our activities may have on the environment and minimise the environmental impact of aspects of work activities that are environmentally significant;
- Preventing pollution and considering opportunities to make a positive contribution to the environment in all activities;
- Minimise noise nuisance, especially on site where the public of residents may be affected;
- Setting and monitoring environmental objectives.

The company ensures that staff has appropriate knowledge of environmental issues by briefing the environmental policy during the induction process. The external rail consultancy was appointed as the responsible person to compile any required environmental /risk assessment. The consultancy provided the services of a person with the following competence;

- IEMA Membership No. 0049\*\*\* expiry dated 23/02/20

In addition, the company had arrangements for Environmental Management which were contained in the following procedure:

- 3.1 Environmental Risk

This details the company's process to manage Environmental Risk and has set targets for environmental performance through its improvements plan. As a result, the organisation had produced an Environmental Aspects and Impacts Register. The impacts and aspects register contained details on:

- Activity
- Aspect
- Impact

Issues included:

- Business travel
- Travel to and from work
- Storage of chemicals
- Buildings lighting
- Office cleaning by contractors
- Building heating
- Buildings water
- Paper use

Impacts included;

- Noise
- Vibration
- Dust
- Odour
- Visual Impact & Impact Lighting
- Releases to land
- Release to water
- Waste
- Ecology
- Archology

The Environmental Policy and Impacts and Aspects Register were reviewed annually as part of the Management System Review, incorporating the risk assessment applicable to the environmental management system. The Aspects and Impacts register was last reviewed 01/03/19.

Environmental risks, when applicable, would be incorporated into the Method Statement and submitted to the Client for inclusion in their Work Package Plan and task briefed sheet for briefing at the start of any task.

Evidence:

- Upper Tier Waste Carrier Licence - Registration number CBDU231196 - Expiry date of registration 21/03/21.
- Competency was provided by the H&S consultant [TP] - IEMA Membership No. 0049\*\*\* expiry dated 23/02/20.

Fully Compliant

**Human Resources including Occupational Health Management [Sentinel - 3]**

Contract of Sponsorship Management [3.1]



**RAILWAY INDUSTRY SUPPLIER  
QUALIFICATION SCHEME**

The company, when acting as the Primary Sponsor, had documented processes in place for establishing a 'Contract of Sponsorship' with each Individual Sentinel Card Holder. Arrangements were contained in the following procedure:

• 8.2 Contract of Sponsorship Management

Any individual who is directly employed by Traction Rail Electrical Ltd to carry out rail work must be sponsored by Traction Rail Electrical Ltd. Employees require sponsorship in the following circumstances;

- New or existing employee who requires initial PTS training
- New employee who holds existing PTS

As part of the contract of sponsorship, the organisation has processes for;

- Provision and management of a valid Sentinel Card;
- Defining the contractual relationship between the primary sponsor and individual and whether sub-sponsors are permitted;
- Provision of Safety Critical equipment to enable them to undertake their competencies trackside;
- Undertaking checks of an individual's suitability to work on the relevant rail infrastructure prior to engaging in a contract of sponsorship;
- 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;
- 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.

Contract of Sponsorship forms were randomly sampled from the list of all Primary Sponsors and the following recorded;

- Operative [LW] signed and dated 01/02/18
- Operative [CH] signed and dated 21/03/18
- Operative [DJ] signed and dated 25/10/17
- Operative [LD] signed and dated 06/12/17
- Operative [SA] signed and dated 01/11/17
- Operative [MW] signed and dated 26/02/18

Fully Compliant

**Human Resources including Occupational Health Management [Sentinel - 3]**

Management of Sub Sponsors [3.2]



**RAILWAY INDUSTRY SUPPLIER  
QUALIFICATION SCHEME**

The company, when acting as the Primary Sponsor, had documented processes in place for the management of sub-sponsors. These arrangements were detailed within the documented procedure:

- 8.3 Management of Sub-sponsors

The procedure states Traction Rail Electrical will permit the use of sub-sponsors for its staff. The company will ensure that it approves all sub sponsoring companies prior to permitting secondary sponsorship. The company will forward a secondary sponsorship agreement to any company wishing to act as a secondary sponsor. The arrangements include:

- A process for reviewing and then either approving or rejecting the sub-sponsors request;
- 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;
- A process for obtaining information on an individual from the Sub-Sponsor;
- A Sub-Sponsor being 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 and safety incidents.

Evidence:

Sub sponsored Agreements and requests;

- Operative [JB] Kier Primary Sponsor - request for operative from TRE dated 22/06/18
- Operative [WR] Deploy UK Primary Sponsor - request for operative from TRE dated 21/09/16
- Operative [ML] TRE Primary Sponsor - request for operative from Kier dated 11/09/17
- Sub sponsorship request form - Operative [JB] TRE Primary Sponsor - request from Keltbray dated 27/04/19 - 29/04/19 for operative [JB] at Grove Park Station. It was verified actual hours worked were shared between companies which Traction Rail had recorded onto the TRE working hours spreadsheet.

Fully Compliant

### **Human Resources including Occupational Health Management [Sentinel - 3]**

#### Misconduct Processes [3.3]

The company had processes and documented responsibilities for a misconduct reporting and investigation process where any suspected misconduct event becomes apparent in relation to Sentinel Sponsorship. These documented requirements were contained within the procedure:

- 8.4 Misconduct Processes

The documented processes included;

- Individual must not be de-sponsored until the outcome of an investigation or hearing has been formulated;
- Records of misconduct or disciplinary hearings or inquiries must be retained on file along with all other sponsorship details;
- The individual has the right to appeal via the appeals hearing process;
- Any allegation of scheme breaches by a sub-sponsor individual shall be reported to the primary sponsor within 14 days.

The company representative confirmed there have been no events of misconduct in the previous 12 months.

Fully Compliant

### **Human Resources including Occupational Health Management [Sentinel - 3]**

#### Occupational Health [3.4]



**RAILWAY INDUSTRY SUPPLIER  
QUALIFICATION SCHEME**

The company had arrangements in place for checking that sponsored workers under its control meet and maintain the health requirements in Network Rail Company Standards and Railway Group Standards. The arrangements were documented within the procedure:

• 8.1 Occupational Health Management

The document included the mandatory requirements for the recruitment and specific requirements for medical screening for employees who are to work on the National Rail Managed Infrastructure. The arrangements covered the following;

- Pre requisite for employees to complete a pre-employment medical self-certification form and inform the company of any change in their medical condition;
- Pre-employment evidence of a current medical certificate indicating compliance with NR Requirements and Standards;
- On-going age-related surveillance to the NR Standard;
- Any medical practitioner requested to undertake the medical examination of an individual returning to work after a period of illness or operation must advise of the type of activity the person is employed to undertake e.g. manual labour, extensive walking requirement or working alone;
- 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 taking prescription drugs that may impact on the safety of themselves or others.

Sentinel website was sampled and confirmed pre-appointment medicals are completed for staff. The following was recorded;

- Operative [CH] Level 1 Medical - Express Medicals - Examination Expiry Date 14/03/28
- Operative [PI] Level 3 Medical - Express Medicals - Examination Expiry Date 14/03/28
- Operative [GH] Level 1 Medical - Express Medicals - Examination Expiry Date 27/11/28

The procedure confirms medicals will be undertaken by Network Rail approved medical assessment providers. This was confirmed on the Approved Supplier List. The Sentinel coordinator monitors Sentinel and database records for the re-examination of staff.

No track visitor permits had been issued in the previous 12 months.

Fully Compliant

**Human Resources including Occupational Health Management [Sentinel - 3]**

Alcohol and Drugs Management [3.5]



**RAILWAY INDUSTRY SUPPLIER  
QUALIFICATION SCHEME**

The company had arrangements in place within the Alcohol and Drugs procedure 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 were contained within the following procedure and Policy:

- 8.5 Alcohol & Drugs Management
- Drugs and Alcohol Policy dated 09/03/19

These documents covered;

- 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;

The procedure confirms drugs and alcohol testing will be undertaken by Network Rail approved medical assessment providers. This was confirmed on the Approved Supplier List. Arrangements were in place to carry out pre-sponsorship and unannounced Drugs and Alcohol testing. The company procedure stated that 5% of unannounced alcohol and drug screening would be carried out over the year and this was evidenced on the Sentinel website.

A 'For Cause' contract was in place with a suitably qualified company.

- Provision of Service - For Cause / Post Incident Testing provided by Fastline. The contract commenced on 01/05/19. Expiry of service 30/04/20.

The company representative confirmed the company have had no requirement to use the 'For Cause' contract.

Evidence:

- Two Unannounced D&A Tests completed in the last 12 months, as follows;
- Operative [PA] - Express Medicals - Unannounced Examination Test - Date 30/01/19 - Pass / Negative
- Operative [CH] - Express Medicals - Unannounced Examination Test - Date 30/01/19 - Pass / Negative
- Pre-Sponsorship D&A Tests verified on Sentinel;
- Operative [GH] - Pre-sponsorship - Express Medicals - Test Date 28/11/18 - Pass / Negative

Fully Compliant

**Human Resources including Occupational Health Management [Sentinel - 3]**

Fatigue Management [3.6]



## RAILWAY INDUSTRY SUPPLIER QUALIFICATION SCHEME

The Company had arrangements in place for Fatigue Management detailed in the following policy and procedure:

- 8.6 Fatigue Management
- Working Hours Policy

The procedure details the arrangements in place for the managing of employee fatigue and identified the maximum hours of work, maximum turns of duty and minimum rest periods as defined in the Network Rail Company Standard NR/L2/ERG/003 and the travel time NR/GN/INI/001 door to door standard. The procedure stated that a risk assessment would be completed using the form 'Exceedance of Working Hours Assessment' and any mitigation required arranged. The work patterns of staff working on railway projects is planned such that there should be no exceeding of the working hours rules unless there is an emergency. The mechanism for the management of the working hours used by the company was by producing a Look Ahead programme for the year ahead. This was managed by the Construction Manager and Project Engineer. This allowed pre-planning of shifts which showed Traction Rail Staff will perform a maximum of a 10hr shift allowing for a minimum of 1hr travel each way.

The operatives are informed of planned hours and shift pattern via Whats App messaging and telephone call. On completion of work, time sheets are completed and sent through by the operatives and recorded on a spreadsheet by office staff. The spreadsheet is formatted to not allow an employee to be assigned to a shift, if they had completed their weekly hours/shifts. In the event of an emergency, the company arrangements for the management of excess hours and authorisation of any requirement to exceed whilst on site was the responsibility of the Managing Director who would complete an exceedance of hours risk assessment form titled 'Exceedance of Working Hours Assessment Form' with the employee and the Client / Principal Contractor.

Evidence:

- Exceedance of Working Hours Assessment Form - dated 24/02/19
- Operative [WR] 06.00 through to 21.00 - 15 hrs worked recorded on working hrs monitoring.
- Operative [PI] 06.00 through to 21.00 - 15 hrs worked recorded on working hrs monitoring.
- Operative [MW] 06.00 through to 21.00 - 15 hrs worked recorded on working hrs monitoring.
- Exceedance of Working Hours Assessment Form - dated 09/12/18
- Operative [PI] 07.00 through to 18.00 - 14.5 hrs worked recorded on working hrs monitoring.
- Operative [CH] 07.00 through to 18.00 - 14.5 hrs worked recorded on working hrs monitoring.
- Stand down day implemented for the operatives.

Fully Compliant

### **Management of Accidents and Incidents [IMR - 4]**

Accident and Incident Reporting and Investigation [4.1]

Appropriate close call, near miss, accident reporting, and investigation arrangements were recorded in the following documented policy and procedure:

- 4.1 Management of Accidents and Incidents
- Accident / Incident / Near Miss / Close Call Reporting Policy

This procedure covered issues such as RIDDOR and reporting to the Client on Network Rail Managed Infrastructure. Traction Rail will undertake their own investigation in accordance with NL/L2/INV/002. The Managing Director / Rail Manager will report all accidents and incidents to the Client within 4 days or to Network Rail in 5 days. Only competent persons will undertake an investigation. If necessary support will be provided by the Rail Consultants. Records of investigations will be retained for 10 years. The procedure describes the process for the effective reporting, logging and investigation of personal accidents, near misses, diseases and occupational ill health occurrence to facilitate compliance with Rail Standards and H&S Legislation. Accident Statistics were maintained by the company and presented on the day. There had been no RIDDOR events in the last 12 months. 1 accident had been reported in the previous 12 months [Minor injury in Storeroom]. The company representative provided evidence of the completed form dated 26/02/19 which demonstrated suitable and sufficient investigation, findings and Managing Director involvement.

Lessons learnt and Tool Box Talk communication were not appropriate to incident / injury recorded.

Fully Compliant

### **Management of Accidents and Incidents [IMR - 4]**

Emergency and Contingency Planning [4.2]



**RAILWAY INDUSTRY SUPPLIER  
QUALIFICATION SCHEME**

The company has arrangements in place for responding to emergencies while undertaking work on rail infrastructure. These are contained in the following procedure:

- 4.2 Emergency Arrangements

The procedure states that operatives must understand the emergency arrangements [communication methods, contact numbers for key staff and nearest hospital] for the site prior to work. As a contractor, personnel are required to follow the emergency arrangements laid down by Clients and Principal Contractors on site. The emergency arrangements will be briefed to personnel at site inductions and through the briefing processes for method statements and work package plans on site.

The procedure includes instruction for operatives involved in an emergency on site, for example;

- Liaising with rail incident officer
- Communication with the media [referring all media to Network Rail media office]

Emergency arrangements were seen contained within Work Package Plans. For example;

Thameslink Resilience Asset Programme - Start date 09/02/19

- Section 5 Site Emergency Arrangements
- Section 5.1.1 First Aid Arrangements
- Section 5.1.2 Evacuation Arrangements
- Section 5.1.3 Fire Safety Arrangements
- Section 5.1.4 Security Arrangements
- Section 5.1.5 Summoning emergency services
- Section 5.1.6 Railway Emergency [trains and electrical]

The Work Package Plan includes;

First Aid Risk Assessment

Emergency Service - East Surrey Hospital - Canada Avenue Redhill, RH1 5RH

[WPP briefed by (ML) with 4 signatures of involved personnel dated 27/01/19]

The company representative provided evidence of provision of competent personnel for emergency arrangements. The following First Aid competencies were sampled;

- Operative [DJ] First Aid at Work - expiry 14/12/21
- Operative [BW] Emergency First Aid with Electrical Accidents expiry 09/01/22

Fully Compliant

**Management of Accidents and Incidents [IMR - 4]**

Restoration of Service (Business Continuity) [4.3]



**RAILWAY INDUSTRY SUPPLIER  
QUALIFICATION SCHEME**

The company had arrangements in place for restoration of service (Business Continuity) whilst working on rail Infrastructure. These are contained in the following document:

- Business Continuity Plan dated 28/01/19

The continuity management plan, ensured that an effective, coordinated programme was in place. The index of the plan was seen to include;

- Critical function checklist
- Command and Control
- Critical Function Analysis and Recovery Process
- MD being away from the business for any length of time including leave and sickness
- Communication within business to staff, contractors, suppliers and Clients

The plan contained the following key information;

- Staff emergency contact list
- Key customers outlined
- Local emergency services
- Utility companies
- Insurance and finance companies
- Local authority

Emergency pack contains;

A copy of this plan;

- Insurance policy
- Computer backup tapes and / or disks
- Financial records
- Spare keys
- Torch & batteries

The Managing Director has overall responsibility for invoking this plan. The company management systems are available through Sharepoint that would immediately provide software as appropriate to enable continuity of access to electronic records and IT support and have the ability to work remotely. The Managing Director has been appointed to deal with media, internal communication, and other interested parties.

The company confirmed that the business continuity plan is tested and provided formal evidence dated 31/01/19. The plan / test looked at the MD being away from the business for any length of time including leave and sickness. The following was reviewed;

- Priority 1 - Michael Lucas being away from the business
- Priority 2 - Communication within business to staff, contractors, suppliers and clients
- Priority 3 - Plant and tooling failure, servicing or repair longer than required
- Priority 4 - Professional Head of Engineering not being available for any length of time including leave and sickness
- Priority 5 - Internet failure in the office

Fire Risk Assessment for the premises was conducted 01/11/18 with report held on site.

Fully Compliant

**Supply Chain Management [IMR - 5]**

Supplier and Subcontractor Management [5.1]



**RAILWAY INDUSTRY SUPPLIER  
QUALIFICATION SCHEME**

Appropriate processes were in place for the use of safety critical and non-safety critical suppliers ensuring effective supplier management. These were contained within the documented procedure:

- 5.1 Approved Suppliers

Traction Rail Electrical Ltd will ensure that where a RISQS product group exists for a particular service or product then only RISQS approved suppliers will be used, in accordance with Network Rail requirements and the RISQS system. The procedure included arrangements for;

- Training and assessment providers [Sentinel coordinator monitors the NSARE] website
- Medical examination and alcohol and drugs screening providers [Sentinel coordinator verifies the providers status every 6 months]
- Personal Protective Equipment providers [No RISQS requirement but obtained to the required EN]
- Hire of plant and equipment [RISQS approved]
- Competent Rail HSQE support [RISQS approved]

Processes described in the document included references to the forms to be used to gather supplier information. The company presented an Approved Supplier list which contained suppliers for PPE, Drugs and Alcohol, Training Provider and Safety Critical Equipment. The company does not undertake supplier audits but performance is discussed during the annual management review meeting. Approved Supplier List - This was broken down into critical and functional suppliers. The following suppliers were sampled and RISQS certificates verified.

- Evidence:

- 4 Rail Consulting Ltd - RISQS Cert No.3279
- Atkins Training - RISQS Cert No.1440
- Express Medicals Ltd - RISQS Cert No. 2248
- Safe Aid - RISQS Cert No.2506
- Garic Limited - RISQS Cert No.1679
- Advante Ltd - RISQS Cert No.3899
- Sub Contractor Questionnaire - Lloyd Davis - dated 20/04/18

Fully Compliant

**Competence Management [IMR - 6]**

Recruitment and Induction [6.1]



**RAILWAY INDUSTRY SUPPLIER  
QUALIFICATION SCHEME**

The company representative stated that recruitment of staff is generally from recommendations. Records of education, qualification, skills & training (normally in the form of CV's) are vetted prior to offering positions to prospective employees.

The company had the following procedure in place to support the recruitment of staff;

- 6.1 Induction

The procedure covered the following;

- Pre-sponsorship check will indicate an individual's current primary and secondary sponsors and rail competencies;
- The recruitment of any person to work on Network Rail Managed Infrastructure or for any rail related assignment is to include the following;
- Initial Consultation
- Confirmation of verification of competence is to be recorded on the recruitment form and on the competency database;.

A check will be carried out to verify that the candidate holds of current rule book modules and/or handbooks appropriate to the competence held. New documents will be issued by Traction Rail Electrical Ltd as required. Details of documents already held or issued are recorded on the document control register spreadsheet. The induction records would contain proof of identity details such as driving licences, passports and national insurance numbers, references, competence details, contract of sponsorship, medical self-assessments and PPE issue records.

The company maintained electronic and hard copy personnel files that contained the details for company induction and were available and viewed as suitable at the time of the audit. The Induction pack was seen to include;

- Rail recruitment checks
- Induction [Issue of contract of Sponsorship]
- Briefing of Policies
- Literacy and Numeracy Assessment
- Medical Self-Declaration
- PPE Issue

Evidence:

- Induction Packs were randomly sampled as follows;
- Operative [LW] Rail Induction signed and dated 01/02/18
- Operative [CH] Rail Induction signed and dated 21/03/18
- Operative [DJ] Rail Induction signed and dated 25/10/17
- Operative [LD] Rail Induction signed and dated 06/12/17
- Operative [SA] Rail Induction signed and dated 01/11/17
- Operative [MW] Rail Induction signed and dated 26/02/18

Fully Compliant

**Competence Management [IMR - 6]**

On-going Competence Management [6.2]



**RAILWAY INDUSTRY SUPPLIER  
QUALIFICATION SCHEME**

On-going competence management arrangements were contained within the following procedure:

- 6.2 Staff Competency

The purpose of the procedure is to describe the competence management system and process for identifying, maintaining and demonstrating competence and to meet identified legal and other requirements. To ensure that all personnel working for or on behalf of the company are competent through a combination of qualification, skills and experience. Records of staff training and/or levels of competency were recorded in a training matrix. Traction Rail will only use Sentinel licensed assessors to undertake the competency assessments. Traction rail manages the Sentinel database which indicates when all training and assessments are due. The procedure included competence cycles as identified in NR/L2/CTM/021.

A process was in place to ensure that expiration of competencies and staff training was monitored. This was managed in a Skills Matrix spreadsheet managed by the Office Manager and Sentinel Coordinator who would monitor all the company's training requirements and expiries. This included both skill specific and rail competencies with copies of the operatives certification held in their personnel file. The skills matrix was sampled and expiry dates cross referenced with the certificates held on file. All records sampled were correct and verified the company's workforce has the required competencies for the scope of works.

Evidence:

- Operative [GH]
- PTS Personal Track Safety - Expiry 13/12/20
- AC Lines - Expiry 13/12/20
- Working Near or Adjacent to the DC Conductor Rail - Expiry 13/12/20
- Track Induction - Expiry 10/01/69
- ICI Induction - Expiry 13/12/24
- Network Rail Induction - Expiry 13/12/24
- Operative [GH] Operative Small Tools Training [Safe Use of Trolley, Rail, Impact Wrench and 100v Hammer] Expiry 22/01/21
- Manual Handling Expiry 07/01/21
- Operative [HA] Entry into Confined Space - Expiry 10/06/20
- Operative [DJ] First Aid at Work - expiry 14/12/21
- Operative [BW] Emergency First Aid with Electrical Accidents expiry 09/01/22
- Operative [PI]
- Personal Track Safety Expiry Date 20/07/19
- Lookout Expiry Date 19/04/20
- [LC DIST] Level C Access & Egress Traction Expiry Date 23/07/19
- [LB 3rd Rail] Level B - Strapping Expiry Date 07/02/21
- Operative [CH]
- Personal Track Safety Expiry Date 06/08/20
- Individual Working Alone Expiry Date 19/05/19
- Controller of Site Safety Expiry Date 19/05/19
- Safe Work Leader 1 Expiry Date 24/10/21

Fully Compliant

**Plant & Equipment [IMR - 7]**

Management, Maintenance and Servicing [7.1]



**RAILWAY INDUSTRY SUPPLIER  
QUALIFICATION SCHEME**

The organisation had a procedure in place covering the management, maintenance, and servicing of plant and equipment in the following documented procedure:

- 7.1 Inspection, Maintenance, and Calibration

The procedure contains the processes to be followed for the control of any plant and equipment and included servicing, maintenance and calibration to ensure the plant and equipment is fit for purpose. All Traction Rail Electrical equipment is allocated with a unique identification number, and registered on a full inventory. Inspection schedules and manufacturers guidance will be used to determine the inspection / maintenance / calibration requirements for each item of equipment. The company have a register and utilise an App [Sortly] which was demonstrated and showed electronic management of the equipment inventory, which consisted of Transformers, Drills, Hydraulic Crimping Equipment and Electrical Meters etc. The asset database demonstrated that the plant and equipment had been given a unique company ID number, listed serial number, current and next inspection status, issued to and date and QR Code. The file containing calibration certificates was sampled against the data held on the App and the certificates were recorded as current.

The company stated that it did not have any plant or equipment that requires thorough examination and all electrical tools are PAT tested with evidence provided. Quarantine arrangements involved damaged plant returned to stores and suitably labelled and stored in quarantine area until repaired or disposed of.

**Evidence:**

- Certificate of Calibration - Megger Digital Low - Serial No. 101602245 - Calibration date 22/05/18
- Certificate of Calibration - Torque / Angle Wrench - Serial No. 0318802874 - Calibration date 15/03/19
- Certificate of Calibration - Live Line Tester - Certificate No. SEA6845/SO/1 - Calibration date 22/05/18
- PAT Testing Register dated 04/06/19

Positive Element - The company use an App [Sortly] for electronic management of its equipment inventory. It is a visual asset tracking system that allows you to add multiple photos of each item, along with any item details [calibration expiry etc], for a more intuitive way to keep track of your inventory across multiple locations. It allows Traction Rail to create or connect QR labels and barcodes to check-in/out items using built-in scanner. The inventory is displayed on desktop, tablet or mobile which the workforce have access to.

Positive Element

**Human Resources including Occupational Health Management [IMR - 8]**

Occupational Health [8.1]



**RAILWAY INDUSTRY SUPPLIER  
QUALIFICATION SCHEME**

The company had arrangements in place to ensure it meets occupational health surveillance requirements. These were documented in the following procedure:

- 8.1 Occupational Health

This procedure defines how the company will comply with requirements of Network Rail applicable to Medical Surveillance requirements for contractors. Prior to employment medical forms were completed, and records of medicals were maintained within the individual's personnel file. Employees must inform the office of any medication they may be taking whilst working on the Railway. Where the results of the above medical self-certificate identify any issues, these will be reviewed and if necessary the individual will be referred to an Occupational Health Practitioner. Where re-examinations show unsuitability for carrying out duties any relevant certification shall be withdrawn and shall only be considered for return following assessment of fit for duty in subsequent re-examination. The company will only use a medical provider that is on the approved suppliers list. The company store its occupational health information on employees in a secured location and all employees have the opportunity to review the records kept regarding them if requested. All staff working in the Rail Industry requiring rail competencies also undertook a rail specific medical examination and A&D testing. The company have a process for managing any employee declaring a negative change to their state of health and taking prescription drugs that may impact on the safety of themselves or others. Traction Rail have signed up to Medical Advice Service with a contract commencement date of 22/04/19. Display Screen Equipment (DSE) assessments were undertaken for all DSE users and records maintained in their personnel files.

Evidence:

- DSE Assessments sampled as follows;
  - Operative [SG] signed and dated 04/19
  - Operative [SC] signed and dated 01/19
  - Operative [ML] signed and dated 01/19
  - Operative [JR] signed and dated 01/19
- Medical Self Certification Questionnaires sampled as follows;
  - Operative [LD] signed and dated - Medical Self-Certificate 06/12/17
  - Operative [DJ] signed and dated - Medical Self-Certificate 25/10/17
  - Operative [CH] signed and dated - Medical Self-Certificate 21/03/18
  - Operative [SA] signed and dated - Medical Self-Certificate 01/11/17
  - Operative [DS] signed and dated - Medical Self-Certificate 20/04/18
  - Operative [JK] signed and dated - Medical Self-Certificate 04/01/19
  - Operative [AB] signed and dated - Medical Self-Certificate 04/02/19
  - Operative [DS] signed and dated - Medical Self-Certificate 14/01/19

Fully Compliant