

## Fatigue Management Policy

As a responsible employer we recognise and as such have arrangements built into our 'Contingency Planning' arrangements demonstrating compliance with both 'The Working Time (Amendment) Regulations', and Network Rail Standard NR/L2/OHS/003 – 'Fatigue Risk Management.

It is subsequently Company policy that the hours of work for all staff shall be restricted to an average of 48 hours per week taken over a 30 day period, unless of course through their own initiative they choose to work more.

However, in so doing staff working on 'Rail Projects' shall in all instances be required to comply with the scope and patterns of work laid out within the previously referenced Network Rail Company Standard NR/L2/OHS/003 – 'Fatigue Risk Management, details of which are listed below:

- No more than 12 hours to be worked per turn of duty
- No more than 72 hours to be worked per calendar week
- A minimum of 12 hours between shifts should be maintained, other than on one occasion per week due to a shift change over, where the period may be reduced to 8 hours.
- No more than 13 shifts out of any 14 are to be worked.

### **Travelling Time**

The above times and patterns of work include travelling time.

### **Rostering Staff:**

When rostering resource to rail projects, Company project planning staff ensure those they allocate are, based on their knowledge and understanding, in full compliance with the above patterns of work. To aid them in their decision, personnel responsible for allocating Sentinel staff utilise Microsoft Excel Spreadsheets etc, showing both previous and future shift patterns for those concerned.

Staff employed on a casual or consultancy basis are required to complete and validate an 'Hours of Work' statement confirming their previous hours / shifts worked prior to them being allocated to projects.

'Hours of Work' statements are retained under controlled conditions by Company project planning staff for the duration of the project for future reference and audit purposes.

### **Changes in Shift Patterns:**

In instances where any change in a previously agreed contract of work results in a change to already 'Rostered Staff Hours' or 'Work Patterns', the person authorising the change to working hours will in all instances ensure the previously referenced 'Planning Arrangements' are applied once again.

### **Exceptional Circumstances:**

Unless under the following exceptional circumstances, no staff allocated to rail projects shall be pre-planned in contravention of the previously referenced scope and patterns of work, namely;

'Circumstances where, owing to adverse weather, equipment failure, accident or incident, extended working limits set in a working time pattern is necessary;

- In order to avoid or reduce risk to people or significant disruption to the running rail services, and
- It is not reasonably practicable to make alternative arrangements.

### **Staff Responsibility:**

In the application of these arrangements, sponsored rail staff are at all times responsible for monitoring their own shift patterns and hours of work, and in instances where they are inadvertently allocated to a rail project such that they shall not be in compliance with the Company scope and patterns of work, they shall make their supervisor aware immediately.

### **Authorising Exceedances:**

All hours / shifts in excess of those previously planned must be authorised in advance by a named responsible person, confirmed within the clients 'Construction Phase Plan', and / or our own 'Work Package Plan'. It is subsequently the responsibility of the named responsible person to record the request such that it is possible to understand the reason for the exceedance as well as its extent.

In instances where staff may potentially need to exceed the hours / shift patterns permitted by NR/L2/OHS/003 – 'Fatigue Risk Management, permission may only be given by named project management staff, following the completion of a 'Formalised and Recorded Risk Assessment'.

The risk assessment shall (a) Justify the need for the exceedance, and (b) Confirm the safe and effective mitigation of any risk(s) that may ensue as a result of the extended working arrangements.

(Ref; [F15.04 - Working Hours Exceedance Permit](#))

When completing the permit, the named responsible person shall enter details relating to the planned extension of hours / shifts, including;

- The reason for the extension
- Details of considered / dismissed alternatives
- Additional controls to be applied to mitigate Risk(s)
- Other Arrangements / Interfaces / Persons considered and affected
- Revised / Planned timescales

In all instances the named responsible person will record the 'Risk Assessment' for the planned extension, whereby all potential hazards and mitigating circumstances are confirmed and recorded, following which the permit should be signed and forwarded to the Site Manager and / or staff he delegates for review at the next planned 'Project Review Meeting'.

Only when he or she is satisfied that the levels of risk are considered to be 'As Low As Reasonably Practicable', shall they sign and authorise the extension to the planned work.

### **Records of Exceedance:**

Feedback appertaining to all exceedance permits raised shall be presented as a pre-determined 'Performance Indicator' for review and monitoring purposes at future 'Management Review / Operations Meetings'.

Records of exceedance may also be ratified to timesheets submitted by staff for payment of salaries.

### **Monitoring of Hours and Exceedances:**

In order to ensure staff allocated to rail projects do not contravene the hours / shifts referenced within this section of the manual, the Site Manager and / or staff he delegates is responsible for ensuring all 'Project Planning / Rostering' arrangements are themselves subject to periodic monitoring processes such that compliance may be validated for future reference and audit purposes.

The raising of an 'Exceedance Permit' is considered to be a 'Negative Indicator', and as such is presented at future 'Project Review / Operations Meetings' where as well as safe and effective close-out, each application is considered for 'Lessons Learnt'.

When reviewing 'Exceedance Permits' at 'Project Review / Operations Meetings', those in attendance are also responsible for determining the root-cause and the implementation of effective corrective and preventive action(s).

### **Contractors:**

In instances where contracted staff / companies are taken on to support 'Company Construction (Rail) Projects', the responsible staff member / Company shall have arrangements in place whereby they are able to effectively demonstrate and validate the 'Management of Hours and Shift Patterns Worked' at least comparable to those mentioned here.

Chris Haigh  
(Managing Director)