

## **Management of Fatigue & control of working hrs Policy**

### **PURPOSE & SCOPE OF POLICY**

To ensure that all personnel employed by EP Industries Ltd who hold a Sentinel card competency or are required to undertake Safety Critical Work are aware of the requirement to work in accordance with the limits as defined by EP Industries Ltd, Legislation, Railway Group Standards, Network Rail Company Standards and European working time directives

### **RELATED DOCUMENTS**

Clocking in Cards for Depot Operatives, Job sheets for offsite works  
Excess Hours Authority Form  
Railways and Other Guided Transport Systems (Safety) Regulations 2006.

Managing Fatigue in Safety Critical Work, Railways and Other Guided Transport Systems (Safety) Regulations July 2006).

Network Rail Company Standard NR/L2/ERG/003 –  
Control of Excessive Working Hours for Persons Undertaking Safety Critical Work (current issue)  
NR/GN/INI/001 Guidance on the Management of Door to Door Working and Travelling Time (current issue)

### **RESPONSIBILITY & SCOPE**

#### **Responsibility**

It is the responsibility of the Managing Director to ensure that all staff both understand and comply with this Procedure.

It is the responsibility of the Managing Director to ensure that this Procedure is updated to reflect identified changes resulting from the Company's review process.

The Managing Director in accordance with this Procedure will make any changes to this Procedure, or issue of authorised changes.

It is the responsibility of all staff to ensure that they are both familiar with this Procedure and that they are working to the current issue of documentation.

#### **Scope**

This Procedure applies to all EP Industries Ltd employees and contractors personnel who hold a Sentinel card competency or are required to undertake Safety Critical Work on behalf of EP industries Ltd.

## Method and Implementation

### Requirement

All EP Industries Ltd employees and contractors personnel who hold a Sentinel card competency or are required to undertake Safety Critical Work on behalf of EP Industries Ltd will have their working hours controlled so that the risks associated with working excessive hours will be minimised.

It is recognised by the company that working excessive hours is potentially unsafe, likely to cause a reduction in service quality and is inconsistent with the company's values. This Procedure also enables EP Industries Ltd to comply with the requirements of Network Rail Company Standard NR/L2/ERG/003 - Control of Excessive Working Hours for Persons Undertaking Safety Critical Work (current issue).

### Working Hours Limits

The following limits on working hours for the above mentioned staff are:

- ☑ Maximum length of turn of duty is 12 hours.
- ☑ Maximum 72 hours worked in a seven day period (Sunday to Saturday).
- ☑ Maximum 13 turns of duty in 14 days.
- ☑ Minimum 12 hours rest between turns of duty.

These limits will normally only be exceeded in emergency situations and require the explicit authority of EP Industries Ltd, based on an assessment of the circumstances

### Analysing Trends in Hours Worked

All EP Industries staff working hours will be subject to analysis to identify if any significant trends are apparent. This will be accomplished by analysis of the Working Hours Records and (as necessary) any Time Sheet for Site Operatives. And also checks on working patterns if such trends exist the company will take appropriate remedial action.

This may include (but will not be limited to the following):

- Adjustment of planned work rosters.
- Adjustment of the current forward work plan.
- Increases in required rest periods.
- Where possible reductions in travelling time

### Exceedance of Working Hours Limits

It is recognised that in exceptional circumstances such as an emergency, equipment failure, accident, incident or adverse weather conditions exceedance of the standard rostered hours may be necessary. The working hour's limits may only be breached when the situation cannot be avoided. In all cases the authority of the Senior Management must be sought and given before the limits are breached. Assurance must be gained before authority is given that the individuals concerned will not be exposing themselves or others to increased risk because of fatigue, lack of concentration etc. Each case must be examined on its own individual merits.

The details of the exceedance must be documented, along with the risk assessment undertaken by the relevant Manager and the identified controls put in place to mitigate any identified risk likely to arise.

The information must be passed to the person responsible for rostering and also health and safety department. In cases of exceedance an assessment of the impact on future rostering must be undertaken to ensure disruption to planned work is kept to a minimum.

Also it must be ensured that those involved with the exceedance are given sufficient rest prior to resuming work.

### **Travelling Time Requirements**

All EP Industries Ltd employees and contractors who hold a Sentinel competency card or are required to undertake Safety Critical Work on behalf of EP Industries Ltd will be required to adhere to the following requirement with regard to travelling to sites and lodging away:

Travelling each way to and from site should ideally be included in the maximum 12 hours turn of duty.

However where this is not possible, the travelling time must not lead an overall turn of duty time in excess of 14 hours.

Where travelling will lead to an exceedance of the above 14 hour turn of duty limit. **LODGING WILL BE REQUIRED IN ALL CIRCUMSTANCES.**

### **Monitoring and implementation of Arrangements**

All hours worked by staff and instances of excess hours working to be recorded.

The correct implementation of the company Hours of Work arrangements are to be monitored by checking the Weekly Hours Summary, Timesheets spreadsheet each week. This will include checking for instances of exceedances of more than 12 hours a shift, of more than 72 hours per calendar week, of more than 13 shifts out of a 14 day period, and a minimum rest period of 12 hours between shifts.



Signed: EDWIN PILSWORTH

Managing Director

Date: 16/04/18

