



## Working Hours and Fatigue Policy

MRPOL004/01/0419  
Last Reviewed: 04/2023  
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Owner: David Hopley

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<b>Millbank Holdings Group Ltd</b> (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
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## 1 Policy

This policy applies to all operatives who undertake work on behalf of MDA Rail.

MDA Rail is committed to enforcing an effective Hours of Work Policy in accordance with the requirements of the following standards;

### 1.1 Network Rail Company Standards;

- NR/L2/OHS/003 (Current issue) - Fatigue Risk Management
- NR/GN/INI/001 (current issue) - Guidance on the Management of Door-to-Door Work & Travel Time.
- Transport and Works Act 1992 (Current issue)
- Railways and other Guided Transport systems (current issue)

We recognise the importance of such a policy in its contribution towards ensuring the health and safety of our employees, Contractors, and all those affected by our works.

Fatigue has been identified as a contributory factor in many accidents therefore MDA Rail will aim to provide as much information to its operatives about the risks associated with being tired at work, and guidance on how individuals can avoid or manage fatigue so that work colleagues are less likely to be harmed by the effects.

MDA Rail will take all measures as far as is reasonably practicable to ensure that all employees and Contractors are aware of and adhere to the guidelines for hours of work.

Any employee or Contractor working for MDA Rail, must not commence or continue work if he or she is fatigued to such an extent that their condition may prejudice his or her safety, or the safety of others.

To contribute to improved safety performance through the control of fatigue the following limitations on hours worked will be applied;

### 1.2 London Underground

- No more than 12 hours to be worked per turn of duty
- A minimum rest period of 11 hours between 2 shifts

Either:

- Consecutive days followed by a rest period not less than 24 hours
- Consecutive days followed by 2 consecutive rest days, each of which is not less than 24 hours
- Within a 14-day period, 2 rest periods, each of which is not less than 24 hours

### 1.3 NRMI

- No more than 12 hours to be worked per turn of duty
- No more than 13 turns of duty to be worked in any 14-day period (Minimum rest after 13 continuous shifts is 48 hours).
- No more than 72 hours to be worked per rolling 7-day week
- No more than 60 hours to be worked per rolling 7-day week– when working for Network Rail LNW)
- A minimum rest period of 12 hours between booking off from a turn of duty to booking on for the next turn. With the exception of the following circumstances:

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- Deviation from the above limits will require a full Risk Assessment which must be authorised by a Senior Manager or person trained in Risk Assessment.
- Operatives when asked to exceed the above Working Time Limits must report this immediately to the Client's representative, and keep the Consultant informed, this is to ensure that the correct risk assessments including Fatigue Risk indicators and exceedance forms can be completed. Under no circumstances must anyone attempt to work excessive hours without prior authorisation from MDA Rail. Records will be kept of all emergency situations.

An exceedance trigger shall be declared by MDA Rail when any of these conditions are or might be reached:

- a person exceeds 60 hours of working in a rolling seven-day period. This shall be classed as a level 1 exceedance;
- a person exceeds 72 hours of working in a rolling seven-day period. This shall be classed as a level 2 exceedance;
- a person receives less than 12 hours break between booking off from their shift / period of duty and booking on for their next shift / period of duty;
- a person works more than 12 hours in one shift or period of duty;
- a person works more than 13 consecutive turns of duty in 14 rolling days;
- a person works when they are expected to exceed a Fatigue Risk Index (FRI) fatigue score of 35 during daytime or 45 during night-time hours;
- a person works when they are expected to exceed an FRI risk score of 1.6 (regardless of daytime or night-time working);
- a person exceeds 14 hours door to door.

## 2 Management of Door-to-Door Work and Travel Time:

All MDA Rail employees and contractors who hold a Sentinel card competency or are required to undertake Safety Critical Work on behalf of MDA Rail will be required to adhere to the following requirement with regard to travelling to and from 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 lodging will be required in all circumstances.

Drivers should not attempt to drive for more than 2 hours without having a break. Ideally drivers will be encouraged to take short, frequent breaks during journeys.

MDA Rail has developed internal procedures and database systems to prevent employees or Contractors from working excess hours or shifts. Measurement of the effectiveness of these procedures will be carried out via a continuous monitoring process. Should this monitoring process reveal a departure from the procedures then appropriate action will be taken.

The implementation of this policy is the responsibility of the Managing Director, assisted by the HSE Consultant and Compliance Manager and other senior members of his management team.

Operatives will be encouraged to communicate regularly with their consultant regarding the effects of fatigue both at work and during rest hours.

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Any problems encountered will be managed accordingly. Any request for exceedance to the working time limits must be reported to the Consultant prior to permission being granted.

This policy will be reviewed annually, when circumstances indicate a change is needed or when legislation is introduced that necessitates change.

### 3 Policy Review

This policy will be reviewed annually, when circumstances indicate a change is needed or when legislation is introduced that necessitates change.

Signed by:

*David Hopley*

Title: Managing Director

Date: April 2023

**Any personal data collected in line with this policy will be stored and used in line with our Data Protection Policy, Retention Policy and Privacy Notice.**