


Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Sentinel Scheme Rules Policy</h2>	MRPOL001/01/0419
		Last Reviewed: 04/2023
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		Owner: David Hopley

1 Sentinel Scheme Rules Policy

Our Rail business acknowledges its responsibility under the Sentinel scheme Rules (current issue) and recognises our duty of care as a primary sponsor. We shall continue to remain committed and maintain our sentinel approval through our RISQS accreditation and membership with CIRAS. We will educate all our staff and contractors on the sentinel scheme rules to ensure full compliance is sustained.

As a Primary sponsor we will sponsor (Primary) a minimum of 30% of our total workforce, which will be measured periodically via observation of the sentinel website.


We shall have processes in place for undertaking pre-sponsorship checks for all Individuals and will conduct and document a pre-sponsorship interview to determine that the Individual is legally eligible to work in the UK and is able to sufficiently communicate in verbal and/or written English (dependent on the safety critical nature or the competencies held).

Specifically, we will;

- Check that there are no suspensions in place that may prevent the Individual from holding a Sentinel Smart Card
- Ensure a pre-sponsorship drugs and alcohol screening is undertaken if the individual's sentinel record or pre sponsorship check shows that screening has not taken place in the last 3 months.
- Review the period for which the Individual has had no Primary Sponsor. Where this is in excess of 6-months we will arrange a mentoring assessment to confirm the Individual is competent
- Undertake a review of work experience to determine the extent to which the Individual has utilised each competence. Where it is determined that the Individual has not practiced a competence within the last 6 months, we will arrange a mentoring assessment to confirm that the Individual remains competent in the applicable competencies

Regardless of the employment status of the Individual, through the Contract of Sponsorship, we shall fulfil the role of the employer for the purposes of health and safety and provide our Primary Sponsored individuals with a Contract of Sponsorship and the following;

- A. A valid Sentinel Smart Card
- B. An induction briefing which will include as a minimum the rules and responsibilities of the Sentinel Scheme
- C. Suitable PPE, so marked as to identify who an Individual is working for when on NRMI, and suitable training to be able to use that protective equipment effectively
- D. Regular briefings on changes to standards, Rule Book updates and Sentinel Scheme Rule updates
- E. Training and assessment to ensure competence at required intervals
- F. Safety Critical Equipment to enable the Individual to undertake their role (jointly with any Sub-sponsor)
- G. Personal issue information such as handbooks and relevant information (If hardcopies required)
- H. Advice, guidance or instruction on any restrictions based on medication and other medical fitness issues
- I. Arrange mentoring support to develop the competence of the Individual

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- J. Clear contractual arrangements between MDA Rail and the Individual, and whether Sub-Sponsors are permitted
- K. Monitoring and management of working hours of Individuals including procedures to include Shifts worked with Sub-Sponsors.
- L. Ensuring all works within our direct control is planned and authorised

We will take specific responsibility for;

- Agreeing any sub-sponsorship arrangements with the Individual and grant permission to any Sub-sponsor to use our resources
- Enact the Local Investigation process where any suspected breach of the Sentinel Scheme Rules becomes apparent
- Collate information from Sub-sponsors to enable conclusion of the Local Investigation.
- Maintaining records of Local Investigations and requesting a Formal Review where a Scheme Outcome is recommended following a Local Investigation
- Provide a reason for de-Sponsoring an Individual and de-sponsoring within 5 working days of the request.
- Conduct a Local Investigation before de-Sponsoring an Individual for any breach of the Sentinel Scheme Rules
- Collate and maintain all records associated with the Contract of Sponsorship of an Individual
- Request a temporary Suspension or issuing a temporary Take Down of competence pending the conclusion of Local Investigation where appropriate.
- When acting as a sub-sponsor we will;
- Request permission to use an Individual from their Primary Sponsor and ensure we receive confirmation of sub-sponsorship status before resourcing the Individual to work.
- Provide any safety critical equipment, PPE and training for works undertaken on our behalf, in line with the task specific risk assessment
- Provide all information to the Primary Sponsor to enable the Primary Sponsor to manage the overall safety of the Individual.
- Notify the Primary Sponsor of any alleged breach of the Sentinel Scheme Rules, within 14 days of becoming aware of such allegation, and co-operate in collecting information and evidence to enable the Primary Sponsor to conduct a Local Investigation.
- Co-operate with the Primary Sponsor in the management of working hours. Where a risk assessment has been conducted and extra working hours approved, this information will be provided to the Primary Sponsor.

At all times we will co-operate and work collaboratively to freely share information about Individuals, relating to a safety issue or an alleged breach of the Sentinel Scheme Rules with the Sentinel Scheme Administrator, sub sponsors and the Network Rail Workforce Safety Team, and update and maintain records of Individuals in the Sentinel Database in a timely fashion.

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

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2 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.