

On-Track Plant Operations Scheme (POS) Frequently Asked Questions (FAQs)

The On-Track Plant Operations Scheme (POS) replaced the Rail Plant Operating Company in Possessions Licence (POL) in June 2014. The following FAQ's and the associated answers relating to the POS are aimed at helping those already approved, or seeking approval, to become POS providers understand the requirements and expectations of the Scheme.

Contents:

- **What are the benefits of becoming a POS provider?**
- **Who do the POS Rules apply to?**
- **Are there any prerequisites to becoming a POS provider?**
- **How do I apply to become a POS provider?**
- **What happens after I have made an application to become a POS provider?**
- **How is approval moved from Provisional to Full?**
- **How long will the process take?**
- **What is involved in maintaining POS provider approval?**
- **What is a suitable maintenance facility?**
- **Why does the POS Representative have to be an employee of the POS provider?**
- **Why does the POS provider have to be a plant owner?**
- **Why can't the POS Representative be engaged in, or responsible for, any other site safety critical duties?**
- **The Scheme Rules mention a whistle-blowing process – is this just for Network Rail or is it available to contractors?**
- **Why is an OTP plan needed?**
- **Are non-OTP operations included in the POS?**
- **Which OTP personnel should a POS Provider supply?**

What are the benefits of becoming a POS provider?

Upon successful completion of the process you will have demonstrated you have sufficient and suitable management system/s in accordance with the POS Rules to act as a OTP Operations Scheme provider, either as a Network Rail organisation or engaged in contracts directly with Network Rail (NR). This may also be as a sub-contractor for a Principal Contractor (PC) on Network Rail Managed Infrastructure (NRMI).

Although this does not guarantee contract work it is a requirement NR places on itself and its contractors to achieve consistent improvement in the delivery of maintenance programmes and infrastructure projects.

Who do the POS Rules apply to?

The POS Rules extend to all organisations carrying out OTP operations on NRMI, by NR, or for NR, or a PC. The scope extends to OTP operations on sites yet to be commissioned and sites temporarily disconnected from the railway. For Contractor

On-Track Plant Operations Scheme (POS) Frequently Asked Questions (FAQs)

organisations other contracts may be dealt with under the RISQS qualification regime, including OTP suppliers managed under NR's Route POS provider status.

Are there any prerequisites to becoming a POS provider?

A contractor organisation that applies to become a POS provider shall, as a minimum:

- Be registered with RISQS and have passed the Industry Minimum Requirements Module and Sentinel Scheme audit requirements
- Have the RISQS product or service codes relevant to the service(s) being provided.
- Comply with the POS Rules and have passed the assurance requirements described within the POS Rules.
- Be a Primary Sponsor as described in the Sentinel Scheme Rules.
- Be in possession of a licence, or licence exemption, issued by the Office of Rail and Road, under Section 6 of the Railways Act 1993.

You should note that meeting the above criteria will not automatically guarantee a successful application.

How do I apply to become a POS provider?

A Contractor company seeking approval must register with RISQS for the respective RICCL codes and submit an application form to RISQS for the On-Track Plant Operations Scheme. The On-Track Plant Operations Scheme will be administered and listed by RISQS as a specialist supplier qualification that can be searched for by buyers in the community.

What happens after I have made an application to become a POS provider?

Following receipt of a POS provider application RISQS/NR will send an acknowledgement to the applicant. For Contractor organisations that qualify RISQS will arrange with the applicant for a POS Management Audit to be conducted. This audit is in addition to the industry Minimum Requirements Audit and follows a POS audit protocol. The POS management audit can be undertaken together with other RISQS audit modules. For NR organisations the POS Management Audit will be conducted internally, The POS Management Audit protocol is the same for NR and the Contractor community.

On successful completion of the management audit NR will provide the applicant with the necessary details for progression to the Technical Audit. This audit will be carried out by the NR Safety, Technical and Engineering (STE) Directorate, who will agree the arrangements once contacted by the applicant. The NR STE Audit Team will choose the site or depot for this audit and follow the POS technical audit protocol.

On successful completion of the Technical Audit the applicant will be awarded Provisional status, which can be displayed on the RISQS website. The Provisional

On-Track Plant Operations Scheme (POS) Frequently Asked Questions (FAQs)

status enables the contractor to be included/ invited to tender whereupon relevant/suitable works can be awarded.

How is approval moved from Provisional to Full?

Upon award of the first contract where the contractor is discharging the role of a POS provider the NR STE Audit Team will arrange with the applicant for an on-site audit to take place. The objective of the site audit is to view the implementation of the management system processes, which the company would not be able to demonstrate at the initial management system audit. This is carried out under live work conditions (no simulation allowed) when available and chosen by the NR STE Audit Team.

Following successful completion of the on-site audit the NR STE Audit Team will inform the POS Review Panel and the applicant will be registered with full approval and entered onto a programme of annual retention audits. The POS provider will be subject to proactive and reactive monitoring throughout the period of their Provisional or Full approval status.

How long will the process take?

The length of time it takes to meet the requirements for full approval status will depend on the following factors:

- The existing standard of your HSQ&E management systems.
- The size and scope of your activity and the risks associated with it.
- The development resources you have available.
- The availability of audit opportunities.

At the outset a timetable and programme for the audits will be agreed between the applicant and Scheme Auditors, based on the assessment of the development work needed to bring the applicant's processes up to the required standard. The process from Provisional to Full status must be completed within three months.

What is involved in maintaining POS provider approval?

Approval will remain valid through continued compliance with the POS Rules and through an ongoing programme of annual audits and monitoring.

Any proposed changes to the POS provider's arrangements or organisation that the original approval was based on will be subject to rigorous assessment of the revised document(s) and any supporting evidence (such as a material change report). Acceptance of the proposed changes may be subject to a re-audit within three months to assure that the measures outlined have been adequately implemented.

On-Track Plant Operations Scheme (POS) Frequently Asked Questions (FAQs)

The POS provider will be required to nominate and maintain a point of contact within their organisation to liaise with the POS Review Panel at POS@networkrail.co.uk for all approval retention issues.

What is a suitable maintenance facility?

Suitable maintenance facilities should have an appropriate level of equipment and accommodation required to carry out the work described in the relevant OTP maintenance plans. The minimum level needed is as follows:

- Clean, dry, covered accommodation for dealing with wheel sets, bearings, mechanical, electrical, pneumatic and hydraulic components etc.
- Adequate illumination for the inspection of components, bogies, and undercarriages.
- Cleaning facilities which will not cause damage to the machine or its components.
- Jacking and blocking devices for raising the machine to remove bogies, wheels and axles.
- Mechanical handling equipment for the removal and refitting of components such as rail bogies and engines etc.
- Protection of vulnerable areas and components from adverse weather conditions.
- A length of straight level track for the conducting of brake tests
- Provision of a suitable anchor and calibrated load cell for the conducting of RCI testing.

Why does the POS Representative have to be an employee of the POS Provider?

The POS representative is not a new role; it merely develops further the previous POL representative requirement. The role has now been brought in line with the requirements of the Sentinel Scheme Rules.

There are proven advantages in personnel commitment, allegiance and behaviour from using the direct employee / employer relationship in the selection of safety critical personnel. It is intended to capture those benefits in the role of POS representative to improve the on-site supervision of OTP operations. The direct employee requirement will assist in improving the competence of POS representatives through their knowledge of the staff, systems and OTP owned and deployed by the POS provider.

Why does the POS provider have to be a plant owner?

The ownership of operational OTP is essential for the POS provider to be able to achieve and deliver the detailed knowledge, experience and understanding of the OTP being used. The ownership requirement also subjects the owner to the technical audit requirements of the scheme. The type and number of OTP is not specified in the scheme rules and the POS provider would be permitted to cross-hire specific

On-Track Plant Operations Scheme (POS) Frequently Asked Questions (FAQs)

equipment for work if required. The ownership of a token item of plant in order to meet the ownership requirement would not guarantee a successful application as the level of ownership should be proportionate to the scope of the applicant's work. This would be confirmed during the application process so applicants that are unable to qualify are not processed through to the audit stage. Compliance with the ownership criteria will continue to be monitored throughout scheme assurance activities.

Why can't the POS Representative be engaged in, or responsible for, any other site safety critical duties?

To avoid any potential conflict in responsibilities or priorities the POS Representative must not be engaged in any other safety critical duties which may lead to confusion, distractions or dilute the primary responsibility of ensuring safe OTP operations. There are some obvious roles that would conflict with the primary objective of the POS Representative e.g. ES, PICOP, etc. These roles have other objectives to achieve which could distract or subordinate the purpose of the POS Representative. It is important to remember that the POS Representative would need to be both a direct employee and in close proximity to the OTP carrying out the work so any other duties or role that could not fulfil these requirements would not be acceptable. A number of Derogations exist to this rule where only one item of OTP is in use on site. E.g. in this circumstance the POS Representative may also carry out the role of machine controller/crane controller and COSS.

The POS provider must make a risk-based decision on how many POS representatives are required to provide adequate OTP control and supervision. Whatever decision is reached would need a safety justification and validation and not be a decision made simply out of cost, expediency or convenience.

The Scheme Rules mention a whistle-blowing process – is this just for Network Rail or is it available to contractors?

Whistle-blowing has been used as a generic term for an anonymous report. This can be through CIRAS or Speak Out as these are industry tools where anyone can report things like incidents or irregularities. These are passed on to a separate part of Network Rail to investigate where necessary. These anonymous reporting channels are separate from the POS or Sentinel Scheme Rules.

Why is an OTP Plan needed?

The POS provider provides the detailed knowledge, understanding and expertise in the use of OTP in the same way a crane operating company would provide a 'contact lift' to a client. This activity supports one of the main principles behind the POS in that 'those who do the work should be involved in planning the work'. The POS provider must therefore be involved in the OTP planning element of the work and may discharge this requirement through their POS Representatives. Due to shifts, rotas or sickness, the POS Representative engaged in the OTP planning element on behalf of the POS provider does not have to be the same person that is deployed to do the actual work.

On-Track Plant Operations Scheme (POS) Frequently Asked Questions (FAQs)

The scheme requires that the POS and the PC communicate and collaborate in developing a method statement. The OTP plan required by the scheme is an input into that method statement and is a means of compliance to the Infrastructure Plant Manual (NR/L2/RMVP/0200). Although the scheme deliberately avoids being prescriptive about the paperwork there remains a requirement in the Infrastructure Plant Manual for Work Plan form SMF/PL/0253 to be used for Infrastructure Maintenance work.

Are non-OTP operations included in the POS?

Plant operations utilising non-rail mounted plant working in conjunction with OTP are included within the scope of the POS Rules. Other usage of non-OTP is not in the scope of the POS rules and therefore the rules do not cover detail in this area. However, it is a pre-requisite that a POS provider has adequate arrangements in place for the provision and use of non-rail mounted plant, similar to the arrangements they apply to OTP. This pre-requisite is to enable compliance with the requirements for the Selection and Use of Suppliers Plant and Services described within the scheme rules.

Principal Contractors will continue to carry out the provision, control and management of non-rail mounted 'civils' type construction plant on construction site environments. The PC Licence Standard includes a requirement for a PC to have adequate arrangements in place for the provision and use of such plant.

Which OTP personnel should a POS Provider supply?

POS Providers are responsible and accountable for all OTP personnel deployed as part of their POS Service. Such OTP personnel would include Machine Operators, POS Representatives, Machine Controllers, Crane Controllers, Slinger/Signallers and Fitters. The POS Rules require that the POS Representative must be an employee of the POS provider, however this rule does not apply to other OTP personnel. POS providers are responsible for ensuring that all OTP personnel meet the competency requirements described in POS regardless of who sources and pays for them.