
Fatigue Management Policy & Process (incl. Rail & Engineering)

March 2026

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Context/scope

This standard applies to directors and managers of DSG, including its subsidiaries (Danny Sullivan & Sons Ltd, Diamond Construction & Engineering Recruitment Limited, and Danny Sullivan Group Academy Limited), (R) who have responsibility for the leadership of safety critical and PTS staff working time patterns on accordance with the “Railways and Other Guided Transport Systems (Safety) Regulations 2006. Regulation 25: Fatigue.” The DSG(R) standard also covers staff required to work on Network Rail, LUL or other train operating company-controlled infrastructure.

When devising or managing working time patterns, Network Rail Standard NR/L2/OHS/003 and the following parameters must be considered: -

- Work time should not be planned to exceed 12 hours in any 24-hour period, with the exception of designated night workers as defined by the working time regulations.
- Door to door time should not be planned to exceed a maximum of 14 hours.
- Where there is a potential to exceed a door-to-door time of 14 hours a robust assessment of imported risk should be undertaken.
- Number of turns which can be worked before time off must be taken.
- Intervals between turns of duty.
- Rest and recuperation breaks within turns of duty.
- Variation in start and finish times of turns of duty.
- Pattern of rotation of shifts on a daily, weekly or other basis.
- Increases or decreases in the overall length of a day or night shifts.
- Rest and recuperation periods between shifts (rest days).
- Frequency or variation in shift types.
- Rapidity of shift cycles.

Controllers of safety critical work should also consult (**Appendix 2**) of this standard to take into account foreseeable causes of fatigue.

Purpose

The purpose of this standard is to describe the process by which DSG (R) manage working time. The main reasons for controlling working time are to: -

- Ensure that safety risks are managed in a professional manner.
- Ensure that suitable control measures are implemented to ensure staff welfare.
- Ensure staff have sufficient rest and recuperation periods within their working time pattern to comply with health and safety requirements.

- Ensure that standards of work are not jeopardised by occupational ill health or by fatigue.
- Ensure that company safety performance are not compromised.

This standard is designed to meet the requirements of legislation and Railway Group Standards.

Policy

Fatigue Management (Rail) Policy

The introduction of controls of working time on Britain's railways can be traced back to the railway accident in December 1988 at Clapham Junction, which resulted in 35 people being killed and 69 seriously injured with 415 people receiving minor injuries.

Anthony Hidden QC's report following his public inquiry into the accident at Clapham Junction identified many causal factors, one of which related to the lack of leadership control of excessive levels of overtime. His report contained 93 recommendations, no. 18 of which stated: -

- "BR shall ensure that overtime is monitored so that no individual is working excessive levels of overtime."
- DSG are committed to meet Client and Infrastructure requirements.

Network Rail Standard NR/L2/OHS/003 Fatigue Risk Management mandates the requirements for the monitoring and control of excessive working hours of employees who undertake work of a safety critical nature, to ensure that employees do not work such hours as would be liable to cause fatigue which would endanger safety.

DSG (R) have developed working time limits for Network Rail using the parameters as follows: -

Category of Limits

- **A** No more than 12 hours to be worked per turn of duty.
- **B** No more than 72 hours to be worked in any seven-day period
- **C** A minimum rest period of 12 hours (10 hours for safety critical work on LUL) between booking off from a turn of duty to booking on for the next turn of duty. This may be reduced to 8 hours at the weekly shift changeover, in the case of staff working a shift pattern that rotates or alternates on a weekly basis.
- **D** No more than 13 turns of duty to be worked in any 14-day period or, for the purposes of LUL, no more than 6 shifts within any 7 consecutive days.

Any site worker who believes they may be at risk of breaching fatigue guidelines should seek urgent advice from:

- **Their Labour Manager (in an urgent situation e.g. travel, accommodation, or a shift change)**
- **E-mail compliance@dannysullivan.co.uk, from which working patterns will be reviewed by a Senior Member of the team.**



Russell Deards
General Counsel & Company Secretary
1st March 2026

Organisation

DSG (R) have developed working time limits for Network Rail using the parameters as follows: -

Category of Limits

- **A** No more than 12 hours to be worked per period of duty/shift
- **B** No more than 72 hours to be worked in any seven-day period
- **C** A minimum rest period of 12 hours (10 hours for safety critical work on LUL) between booking off from a period of duty/shift to booking on for the next period of duty/shift.
- **D** No more than 13 periods of duty to be worked in any 14-day period or, for the purposes of LUL, no more than 6 shifts within any 7 consecutive days.

DSG(R) have developed working time limits for LUL using the parameters as follows:

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- **A** No more than 12 hours to be worked per turn of duty.
- **B** A minimum rest period of 11 hours between any two shifts.
- **C** The consecutive days to be worked before a rest period when working on, over or adjacent to LUL infrastructure shall be either:
 - Six consecutive days, followed by a rest period of 24 hours.
 - 12 consecutive days, followed by two consecutive rest days, each of which is not less than 24 hours; Within any 14-day period, two rest periods, each of which is not less than 24 hours.

DSG (R) must ensure that compliance is maintained at all times with the limits. Only in very exceptional circumstances and under a strictly controlled process can these limits be exceeded. The circumstances that are classed as exceptional are listed below: -

- Extreme adverse weather.
- Failure of safety critical equipment.
- Major disruption where all train services are affected
- Where strict compliance with the working time limits will significantly increase the risk to staff and passengers.

In addition to the measures taken by directors and managers of DSG (R), safety critical staff are also responsible for contacting their operations manager if they are asked, by

a client/main contractor to exceed their working hours for any reason.

Once contacted, the operations manager must write a simple risk assessment to determine if the safety critical employee can exceed the working hour limits. An example of this simple risk assessment can be found in **Appendix 3**.

Planning and Implementation

Summary of monitoring of working time patterns

A robust monitoring process is required to demonstrate compliance, which ensures the non-compliance is identified at an early stage and appropriate remedial action implemented to redress any adverse trends.

Specific to any mandatory “Authorisation Workflow and Fatigue Thresholds” any request to exceed the prescribed working time limits or fatigue thresholds must be processed through the mandatory authorisation workflow, as set out in CORS 7.2 CA - Procedure Rev 4.

- The workflow requires:
 - Identification of the specific fatigue threshold(s) to be exceeded.
 - Completion of a formal risk assessment (see Appendix 3).
 - Written justification for the exceedance, including operational necessity and mitigation measures.
 - Approval from the Operations Director and or designated authority prior to the exceedance, except in emergency situations where retrospective authorisation is required as soon as practicable.
- All authorisations and associated documentation must be retained for audit and review purposes.
- Fatigue thresholds must be regularly reviewed and updated in line with legislative and industry best practice.

Local Operation Directors and Managers must ensure that staff ***do not*** exceed the limits contained within section 5, other than under very exceptional circumstances as listed in 12.30.4.2. The client/main contractor will determine the circumstances and liaise with the Director (Rail) or the HSQE Director as appropriate.

The Operations *Director* (Rail) must ensure that known or forecasted breaches of working time patterns are reviewed and alternative arrangements implemented to prevent the breach, or a risk assessment carried out to mitigate continued working. Where a risk assessment is carried out it should consider the following:

- Nature of work
- Breaks available during the work
- Length of shift
- Rest period between shifts
- Number of shifts undertaken/planned over a 13-day period
- Next rostered shift

Where this is not possible, the HSQE Director must ensure that he/she authorises the breach prior to its occurrence and fully understands the circumstances for the breach.

In circumstances where it is not possible to obtain authorisation for a breach of working time limits prior to or at the time of the breach the Operations *Director* (Rail) must ensure that he/she authorises the breach as soon as reasonably practicable following the breach.

Information to be recorded regarding the breach of working time limits is as follows:

- Name of member of staff.
- Grade and post title.
- Type of breach A, B, C, D.
- Date of breach.
- Reason for breach.
- Level of breach.
- Signature of Manager authorising the breach
- Date breach was authorised.

The Company Secretary will supply a record of breaches of these working time hours to the HSQE Director for analysis and for inclusion in the Safety Report.

Employees, during induction, will be asked to sign a form (**Appendix 1**) declaring that they will not work in breach of the working hours set down in Section 12.30.4.1 above. This form will be maintained in the employee's personal file.

Summary of method for changing working time patterns

In addition to the information required under safety validation the sponsoring manager must supply the following information, which must be described in detail, to the HSQE Director:

- Number of hours per shift.
- Length of rest periods and position within shift.
- Number of consecutive shift (a roster if possible).
- Revised working time patterns/arrangements.
- Any unusual aspects of the change (split shifts, etc).
- Who and what the proposal will apply to.
- A suitable and sufficient assessment of the risk.

- The personnel (by title) who assisted with the development of the proposal.
- Details of the reasons for proposal.
- A strategy for implementation of the proposal including the start, completion and consultation dates.

The list is not exhaustive and must be supplemented with any additional information that assists to clarify the proposal.

In addition to the above, any employee required to work on Network Rail, LUL or other train operating company-controlled infrastructure will be required to declare, before commencing work if they have worked for another company within 14 days of taking up employment through DSG (R). If the employee declares that he has worked

for another company in the last 14 days, then he will be asked to declare in writing if he/she has breached any of the working hours patterns described in this standard. If taking up duty with DSG (R) would breach the working hour patterns, then the employee must not be allowed to start work.

The working hours of all sub-sponsored rail employees will be issued to the relevant primary sponsors (see Sentinel Leadership – Sub-Sponsorship leadership).

Measuring Performance

The Company Secretary is responsible for retaining documented information and associated documented information regarding changes or breaches to working time limits, for a minimum of two years. He/she must ensure that the information is readily available on request and is maintained in a professional manner, so that deterioration is minimised.

Monitoring and Review

The HSQE Director is responsible for monitoring and reviewing working time limits to ensure compliance with this standard. Where adverse trends or other causes for concern are identified, the HSQE Director must initiate a review of working time patterns and implement action to address the results of the review.

Where revised changes to working time patterns are introduced, the HSQE Director must ensure that a monitoring regime is in place to determine any potential risks that may arise. Listed below are a number of areas which the HSQE Director should consider following changes: -

- Levels of breaches
- Levels of sickness and absenteeism
- Accidents and incidents
- Safety inspections
- Competence assessments
- Staff behaviour

- Reduction in self- motivation
- Lack of flexibility and willingness to change activities/shift patterns

This list is not exhaustive and should be supplemented as necessary by the HSQE Director.

Independent monitoring of this *process* is provided via the RISQS 'Proof' Audit

APPENDIX 1

Declaration Form

I Have Been Briefed On This Document And On “The Golden Rules” And Fully Understand The Document And “The Golden Rules.” I Have Paid Particular Attention To The Company’s Drugs And Alcohol Policy And Their Hours Of Work Arrangements. I Have Also Received A Copy Of The Modular Rule Book Relevant To The Work I Carry Out On The Railway/Lul Infrastructure Along With A Copy Of The Personal Track Safety Handbook.

Network Rail

I, Declare that I will not work in breach of the working hours set out below

- A** No more than 12 hours to be worked per turn of duty.
- B** No more than 72 hours to be worked in any seven-day period
- C** A minimum rest period of 12 hours between booking off from a turn of duty to booking on for the next turn of duty. This may be reduced to 8 hours at the weekly shift changeover, in the case of staff working a shift pattern that rotates or alternates on a weekly basis.
- D** No more than 13 turns of duty to be worked in any 14-day period.

Signed

I also declare that I will not breach the DSG(R) Drugs & Alcohol policy.

Signed

LUL

- A** No more than 12 hours to be worked per turn of duty.
- B** A minimum rest period of 11 hours between any two shifts.
- C** The consecutive days to be worked before a rest period when working on, over or adjacent to LUL infrastructure shall be either:
 - Six consecutive days, followed by a rest period of 24 hours.
 - 12 consecutive days, followed by two consecutive rest days, each of which is not less than 24 hours.
 - Within any 14-day period, two rest periods, each of which is not less than 24 hours.

Signed

I also declare that I will not breach the DSG(R) Drugs & Alcohol policy.

APPENDIX 2

Setting standards and designing working patterns.

The absence of relevant recognised national industry standards and limits, the standards and limits that the controller of safety critical work sets should, so far as is reasonably practicable, take into account foreseeable causes of fatigue, including,

- job design
- the workload and the working environment
- the shift system in operation
- shift exchange
- control of overtime
- on-call working
- the frequency of breaks
- recovery time during periods of duty
- the nature and duration of ant time spent travelling

Limits for hours worked and working patterns for safety critical workers are appropriate for:

- the maximum length of any shift or **period of duty**
- the minimum rest interval between any **periods of duty**
- the maximum number of hours to be worked in any seven-day period
- the minimum frequency of rest days
- the maximum number of consecutive **day shifts**
- the maximum number of consecutive **night shifts** and **early morning shifts**
- the maximum period of time between breaks, including breaks for meals.

Working patterns can be designed to:

- Minimise the build-up of fatigue by restricting the number of consecutive **night** or **early morning shifts**
- Allow fatigue to dissipate by ensuring adequate rest between shifts and between blocks of shifts
- Minimise sleep disturbance

Controllers of safety critical work should take full account of, “Managing fatigue in safety critical work – Railways and Other Guided Transport Systems (Safety) Regulations July 2006,” guidance issued by the Office of Rail Regulation.

