

Work Hours & Fatigue Management Policy

JSPC Group LTD

1. Policy Statement

JSPC Group LTD is committed to ensuring that working hours are planned, managed, and monitored to protect the health, safety, and wellbeing of all employees and those affected by our work.

We recognise that fatigue is a significant safety risk within the rail industry. In line with **Network Rail requirements**, JSPC Group LTD adopts a proactive approach to fatigue risk management to ensure work is delivered safely and responsibly.

This policy supports compliance with:

- Network Rail Supplier Code of Conduct
 - Network Rail Fatigue Risk Management principles
 - The Working Time Regulations 1998
 - Health and Safety at Work etc. Act 1974
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2. Scope

This policy applies to:

- All employees of JSPC Group LTD
- Agency workers and labour supplied to JSPC Group LTD
- Subcontractors working under the control of JSPC Group LTD
- All work activities, including rail, construction, maintenance, and project delivery

Compliance with this policy is mandatory.

3. Responsibilities

Directors and Senior Management

- Ensure effective systems are in place to manage working hours and fatigue risks
- Promote a culture where fatigue concerns can be raised without fear of reprisal
- Ensure compliance with Network Rail and client requirements

Managers and Supervisors

- Plan work to avoid excessive working hours
- Monitor hours worked, rest periods, overtime, and travel time
- Undertake fatigue risk assessments where required
- Ensure workers are fit for duty before starting work

Employees and Workers

- Comply with this policy and declared working hours
- Present themselves fit for duty
- Accurately record all working hours, including secondary employment
- Inform management if they feel fatigued or unfit to work

4. Working Hours and Planning Principles

JSPC Group LTD will ensure that:

- Work is planned to avoid excessive or prolonged shifts
- Adequate rest periods are provided between shifts
- Night work and consecutive shifts are carefully controlled
- Overtime is monitored and limited
- Secondary employment is declared and considered in fatigue assessments

Where Network Rail or client-specific requirements are more restrictive, those requirements will apply.

5. Fatigue Risk Management

Fatigue risks will be managed by:

- Considering fatigue during work planning and rostering
- Monitoring cumulative working hours and shift patterns
- Managing night work, early starts, and long travel times
- Encouraging self-reporting of fatigue without penalty
- Removing individuals from safety-critical duties if fatigue is identified

Fatigue risk assessments will be undertaken where thresholds are approached or work patterns change.

6. Fitness for Duty

All workers must be fit for duty at the start of each shift.

Individuals must not work if affected by:

- Fatigue
- Illness or injury
- Medication, drugs, or alcohol
- Any condition that may impair alertness, judgement, or performance

Managers have the authority to stand individuals down where fitness for duty is in doubt.

7. Recording and Monitoring Hours

JSPC Group LTD will:

- Maintain accurate records of working hours and rest periods
- Monitor compliance with this policy and legal requirements
- Review records during audits, site inspections, and assurance activities
- Provide records to Network Rail or clients upon request

Deliberate falsification of working hours records will be treated as a serious breach.

8. Non-Compliance

Failure to comply with this policy may result in:

- Removal from site or duties
 - Disciplinary action
 - Review or termination of subcontractor or agency arrangements
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9. Continuous Improvement

This policy will be:

- Reviewed at least annually
 - Updated to reflect changes in legislation or Network Rail standards
 - Communicated to all relevant employees and supply-chain partners
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Appendix A – Maximum Working Hours & Rest Limits (Fatigue Controls)

JSPC Group LTD applies the following **maximum working hour limits**, aligned with **Network Rail fatigue risk matrices** and rail industry best practice.

Where Network Rail, client, or project-specific rules are more restrictive, those limits will take precedence.

A1. Maximum Shift Length

- **Day shifts (including travel):**
Maximum 12 hours
- **Night shifts (including travel):**
Maximum 12 hours
- **Safety-critical duties:**
Maximum 12 hours
(Shorter shifts may be applied following fatigue assessment)

No worker will be permitted to work beyond 12 hours under any circumstances.

A2. Minimum Rest Periods

- **Minimum rest between shifts:**
12 hours
 - **Following night shifts:**
Minimum **12 hours**, increasing to **24 hours** following consecutive night shifts where practicable
 - **After extended or disrupted shifts:**
Rest periods will be increased based on fatigue risk assessment
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A3. Weekly Working Hours

- **Maximum hours in any 7-day period:**
72 hours (including overtime and secondary employment)
- **Planned maximum:**
60 hours

Where cumulative hours approach these limits, fatigue risks must be reviewed and work plans adjusted.

A4. Consecutive Working Days

- **Maximum consecutive working days:**
13 days
- **Minimum rest following 13 consecutive days:**
48 hours

Fatigue assessments must be completed where workers approach these limits.

A5. Night Work Limits

- **Maximum consecutive night shifts:**
4 nights
 - **Maximum hours per night shift:**
12 hours
 - **Rest following consecutive night shifts:**
Minimum 48 hours
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A6. Travel Time

- Travel time contributing to fatigue will be treated as working time for fatigue assessment purposes
 - Excessive travel before or after shifts must be avoided
 - Shift length or duties will be adjusted where long travel distances are unavoidable
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A7. Secondary Employment

- All secondary employment **must be declared**

- Hours worked elsewhere will be included in all fatigue calculations

Failure to declare secondary employment will be treated as a serious breach of this policy.

A8. Exceedance Controls

Exceeding the limits in this appendix is **not permitted**.

If exceptional circumstances arise:

- Work must stop
 - Management approval is required
 - A documented fatigue risk assessment must be completed
 - Network Rail or the client must be informed where applicable
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10. Approval

This policy has been approved by the Directors of JSPC Group LTD and is effective immediately.

Signed:

Director

JSPC Group LTD

Date: J. Sands