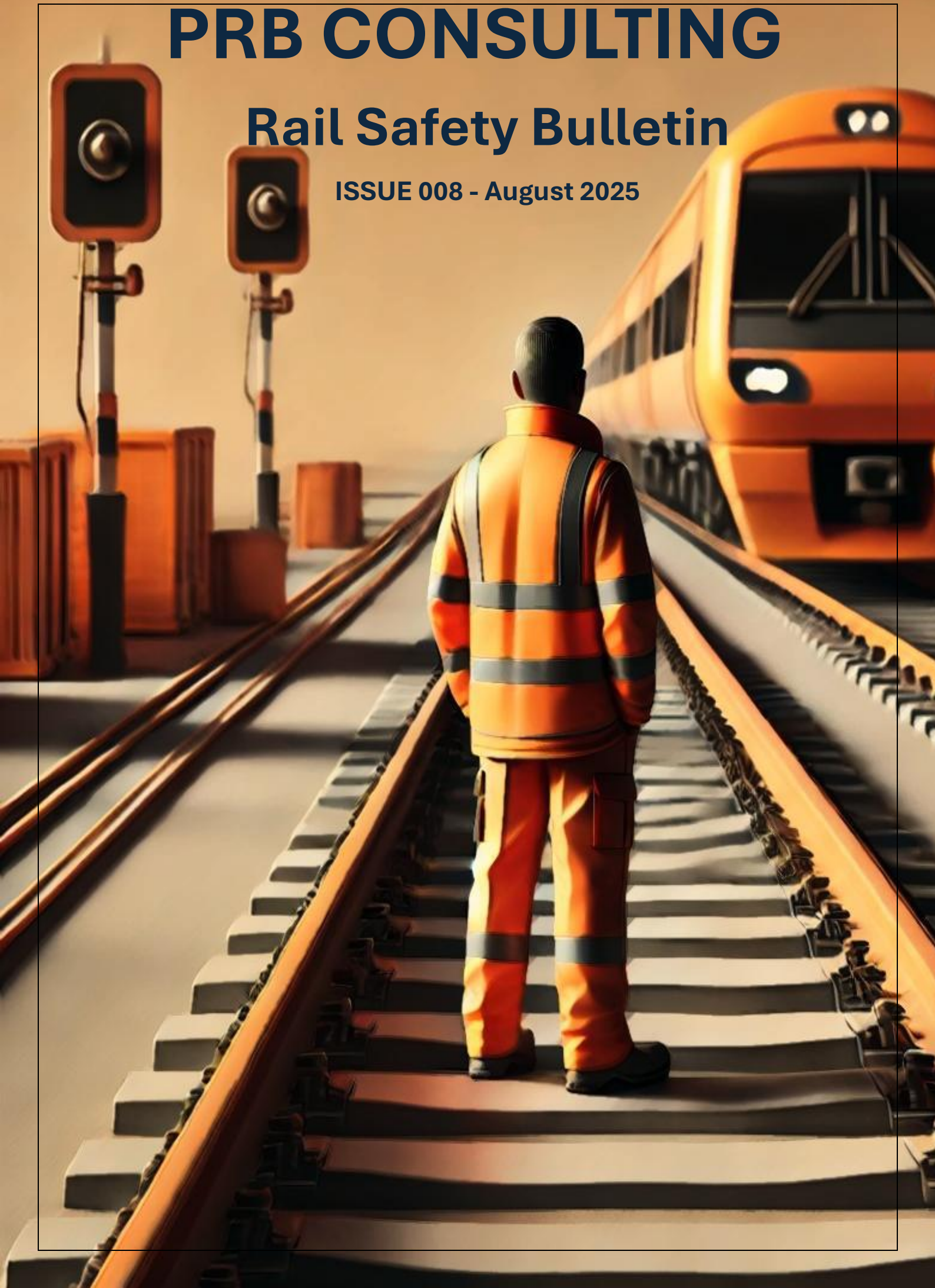


PRB CONSULTING

Rail Safety Bulletin

ISSUE 008 - August 2025



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Toolbox Talk: Separation of Waste (England) Regulations 2025

1. Why Are We Talking About This?

From 31 March 2025, new waste regulations came into force in England. They require businesses to separate recyclable and food waste from general waste. This helps increase recycling, reduce landfill, and protect the environment. If your business has fewer than 10 full-time equivalent employees, **you're exempt from mandatory compliance until 31 March 2027.**

2. What Does It Mean for Us?

We must now ensure that waste is placed in the **correct bin**:

- **Paper & Cardboard** – clean paper, office paper, cardboard packaging.
- **Dry Mixed Recyclables** – plastics, tins, cans, glass bottles and jars.
- **Food Waste** – leftovers, tea bags, coffee grounds, kitchen scraps.
- **Residual Waste** – anything that cannot be recycled (e.g. contaminated materials, non-recyclable packaging).

⚠ Mixing waste streams (contamination) means materials may end up in landfill instead of being recycled.

3. Our Responsibilities

- **Everyone** is responsible for separating waste correctly.
- Follow **signs on bins** and use the right containers.
- Report any damaged or missing bins to your supervisor.
- Never put liquids, oils, or hazardous substances in general waste bins.

4. Benefits of Doing It Right

- Complies with **legal requirements** (Separation of Waste Regulations 2025).
- Reduces waste disposal costs.
- Supports our company's sustainability goals.
- Protects the environment for future generations.

5. Questions for the Team

- Do you know where the correct bins are located in your work area?
- What should you do if you see someone using the wrong bin?
- Can anyone give examples of common items that go in **residual waste only**?

✅ **Remember:** Waste separation is now a **legal requirement**. Doing it correctly is part of keeping our workplace compliant and environmentally responsible.



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Positive Changes to Training, Assessments & Payment Methods – Sentinel Rule Update

We're pleased to share some **positive news** about training, assessments, and payment options within the Sentinel Scheme.

What's Changed?

In **December 2024**, Sentinel Scheme Rules Version 5 came into effect. One of the big changes was that **primary sponsors had to pay for all training recorded on Sentinel** for their operatives.

While this was intended to stop companies from pushing training costs onto individuals (e.g. for PTS), it also created some problems. For example, it stopped individuals from paying for their own development courses and limited what sub-sponsors and booking agents could do.

As of **July 2025**, the rules have been updated again (now **Version 5.1**) with much clearer and fairer guidance.

Key Updates

-  **Individuals** can now pay for their own training if they choose.
-  **Sub-sponsors** can also pay for training.
-  **Booking agents** can continue to pay on behalf of candidates.
-  The only exception remains **PTS training**, which must always be paid for by a **primary or sub-sponsor** — never the individual.

What This Means for You

- Training providers will accept payment from **individuals, sub-sponsors, primary sponsors, or booking agents**.
- For **PTS training**, payment will only be accepted from the **primary or sub-sponsor**, as this is a minimum requirement that sponsors must provide.

Why This Matters

This update is a great example of **industry feedback leading to positive change**. Network Rail and Sentinel have listened, and the new rules now strike a better balance between sponsor responsibilities and individual development opportunities.

For full details, you can read the Sentinel Scheme Rules V5.1 (see section 3.2.3, item F).



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Fatal Road Traffic Collision – NRL25-04

Incident Summery

At approximately 0245 on Wednesday 8 May 2024, two Vital Human Resources Limited (VHRL) employees were involved in a fatal RTC on the M40 Northbound. Returning home post-shift from Hemel Hempstead, their vehicle collided with the rear of a Heavy Goods Vehicle (HGV). The driver sustained nonlife-threatening injuries.



Tragically, the passenger later died. Both had chosen to forgo their pre-booked hotel accommodation to return home for personal reasons. This incident underscores the critical risks posed by fatigue, policy non-adherence, and gaps in monitoring and assurance.

During the investigation, the parallel police investigation meant the driver could not be interviewed, and the hire vehicle lacked telematics to support post-incident reconstruction.

However, the revised Fatigue Risk Index (FRI) score of 39.7% indicated a high risk of microsleep. Given the early-morning timing following a night shift and being over 60 minutes into a 90-minute journey, it is reasonable to conclude that the driver's alertness was likely impaired due to fatigue, even if the exact cause - such as microsleep or loss of concentration - cannot be definitively confirmed.

What Went Wrong?

Planned Control	Actual Outcome
Post-shift hotel provided to mitigate fatigue	Hotel unused - both employees chose to travel home overnight
Telematics-enabled fleet vehicle	Short-term hire vehicle had no telematics or monitoring required by VHRL policy
Fatigue Risk Index (FRI) compliance monitored via PeopleSoft	PeopleSoft scores based on incorrect data; adjusted FRI score was 39.7%
Sentinel app used for sign-in/out to support fatigue tracking	Manual sign-in used, undermining data reliability
Assurance of contractor rest periods	No mechanism to confirm if booked hotel accommodation was used



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Behavioural and Systematic Insights

- Personal responsibilities (childcare, appointments) motivated a decision to return home rather than rest.
- Night driving following a shift increased fatigue risk, equivalent in impairment to alcohol.
- Vehicle lacked data-capturing systems, limiting post-incident reconstruction and assurance.
- Sentinel swipe protocol was bypassed, impairing fatigue and attendance data quality.
- Policy assumed rest would be taken if provided - no check was in place to verify.

Key Lessons

- Fatigue must be treated as a live risk, even below FRI trigger points.
- Behavioural choices under pressure (e.g. returning home) can override planned controls.
- Short-term hire vehicles must meet baseline monitoring requirements.
- Sentinel compliance must be actively monitored, not assumed.
- Booking rest does not guarantee rest - assurance processes must verify usage.

Recommendations

Network Rail

- Confirm Sentinel swipe-in requirement in Scheme Rules v5 and brief accordingly.
- Explore feasibility of validating hotel room usage as part of fatigue assurance

Vital HR Ltd

- Review process for inputting shift data into PeopleSoft to ensure FRI accuracy.
- Install geofencing and telematics in all fleet and hire vehicles.
- Deliver refresher driver training on fatigue, post-shift travel risk, and lifesaving rules.
- Brief all drivers on consequences of non-compliance with rest policy and Sentinel protocol.

Key Takeaway

This fatal incident was not the result of one failure, but a series of unverified assumptions. Behaviour, fatigue, monitoring gaps, and policy execution all intersected. Preventing recurrence requires not only policies but living, verifiable compliance and behavioural alignment under pressure.

Part of our group
of Safety Bulletins

Safety
Alert

Safety
Bulletin

Safety
Advice

Shared
Learning



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Scaffold Incident at London Liverpool Street Station

Overview

London Liverpool Street Station is currently undergoing roof refurbishment works, replacing the life expired Glass Reinforced Plastic (GRP) above platforms 1-10 as well as spot replacement of Georgian Wire Glass above the concourse area.

During the installation of a tube and fitting hanger for a suspended scaffold, a supplementary check coupler fell approximately 15 metres onto one of the station platforms.

The coupler landed within an exclusion zone that had been established on the station platform, resulting in no injuries or damage.

The investigation concluded that the coupler had not been correctly tightened and vibrated loose when the scaffolder was working on an adjacent fitting.

Underlying Causes

- The check coupler fell because it was not correctly tightened. The orientation of the check coupler prevented the scaffolder having visibility of the bolt head whilst tightening the fixing. This led to the bolt being insecure, and vibrations from ongoing work caused the coupler to loosen and fall.
- The scaffold supervisor was working from a Task Briefing Sheet however the chain of documentation did not suitably pass risk controls from the Work Package Plan, therefore those undertaking the works were not adequately aware of the risk controls.
- The coupler was not contained at a high level because the encapsulation netting, which should have been installed, was not in place.
- The scaffold manager, who was aware of the planned methodology and specific controls, was not on site. The information had not been passed to the scaffold supervisor in charge of the night works.
- Consequently, the supervisor was unaware of the netting requirement. The scaffold design is complex, and netting can only be installed at certain points to address specific risks.



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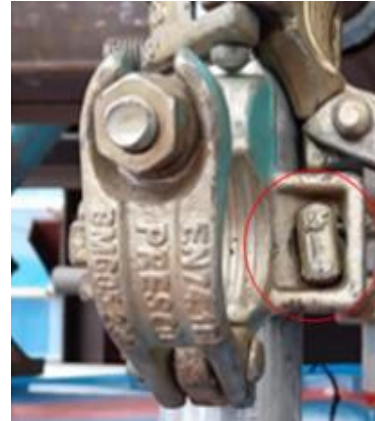
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Bottom fitting was acting as supplementary coupler. Note: Not the actual fitting, this is a similar arrangement.



Fitting showing how the bolt head should have been seated in the clip body correctly to prevent fitting becoming loose and falling.



Revised detail with swivel coupler fittings permitting visual inspection of both fittings by erector. Note: Yellow Clikon caps to aid inspection.



Exclusion zone in place during the scaffold works.

Key Message

- The design of scaffold should take account of installation restrictions and make sure components are selected that suitable for safe installation by those undertaking the works.
- Supervisors in charge of works should be provided with and briefed on the Work Package Plan and Task Briefing contents and ideally involved in their development.
- Specific risk controls detailed in the Work Package Plan should be incorporated into the Task Briefing Sheet to make sure that the correct level of detail is delivered through briefing to those undertaking the works.
- Principal Contractors to review their assurance procedures and processes to assure that Contractors/Sub-Contractors are working in accordance with defined methodology and designs/specifications.



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NRA25-08 – Tampering of Braking Systems on Manually Propelled Trolley and Grinding Equipment

Overview

There has been several instances over the last two years where braking systems fitted to Manually Propelled Trolley (MPT) and Grinding Equipment have been tampered with thus making the braking systems ineffective. This activity increases the risk of runaway, possible injury to staff if struck by MPT and damage to equipment.

Operators of these equipment types are reminded that interfering with safety system such as brakes can lead to you or your colleagues being injured or killed; this is a breach of Network Rails Life Saving rules.

These practices also contravene NR/L2/RMVP/0200 P514 paragraph 3.3.2 “Do not adjust or interfere with the braking mechanism of a trolley” The practice of interfering with such systems should cease with immediate effect. If these systems are identified as faulty, then the equipment should be immediately removed and quarantined.

There will be increased surveillance activities around the use of these equipment types.



Discussion Points

- Are competent staff operating the equipment as per their training and discharging their duties accordingly?
- Is the work planned correctly considering the distances and staff numbers that are required to push the equipment?
- When were staff last reminded of their responsibilities regarding interfering with designated safety systems such as brakes?
- What methods are in place to manage fatigue when operating MPT equipment?
- If there is an apparent issue with the safety system, how should it be resolved, is interfering with the system the right course of action? Part of our group of Safety Bulletins
- If the brake system fitted to the equipment is deemed faulty then it shall be labelled, quarantined, and not be issued for use before such time as new parts are fitted.
- Are the correct number of staff identified to allow the equipment to be operated safely.
- Ask yourself “how would I feel” if I or my colleagues were struck by runaway MPT where the brakes had been tampered with by you or someone else.
- Are L1 assurance activities being undertaken to check plant?



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Changes to Industrial Head Protection Standard – EN 397:2025

From **2025**, the new **EN 397:2025 Industrial Safety Helmets** standard replaces the older 2012 version. This update affects the type of helmets used across UK industry and introduces clearer requirements for employers, suppliers, and workers.

What's Changing?

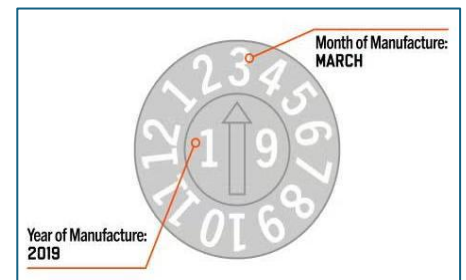
- Two Helmet Types
 - **Type 1** – protects against impact from above (crown only).
 - **Type 2** – protects against impact from the top, front, sides, and rear. Type 2 helmets must include a chin strap to improve stability.
- Electrical Protection Moved
 - Electrical insulation is no longer part of EN 397. Helmets for electrical work must now comply with EN 50365.
- New Features
 - Options for **electrostatic dissipation (ESD)** and **high-visibility helmets** are now included.
 - Testing has been improved to make results more consistent and reliable.

What Does This Mean for You?

- When ordering or issuing helmets, you'll need to **specify Type 1 or Type 2** depending on the risks of the job.
- If electrical protection is required, make sure the helmet is certified to **EN 50365**.
- Supervisors should update **PPE registers, risk assessments, and training** to reflect the new classifications.
- Workers should be aware that not all helmets give the same level of protection—**check the label before use**.

PRB Recommendations

A hard hat doesn't have a universal expiry date; its lifespan, typically 3-5 years of use, depends on the manufacturer's guidelines and the specific model, as well as the conditions it's exposed to. You can find the manufacturing date by locating the clock-like symbol on the inside of the shell, where the arrow points to the month and the centre numbers indicate the year. Always check the manufacturer's specific recommendations for shelf and service life and replace the hard hat if it shows signs of damage or has exceeded its recommended use period



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QUIZ TIME

There were quite a few correct entries to the Quiz that was set in June 2025 Rail Safety Bulletin

The Question

Over the past four years how many recorded near miss incidents involving pedestrians has there been at level crossings?

Answer: 1,574

The first name out of the stationmaster's hat was... Michael Baxter from Engineering Consultancy Service.

Congratulations Michael, the M&S Voucher is on its way!!

So, this month we have another opportunity to create a winner!

There is a £25 M&S Voucher up for grabs in this, the August Rail Safety Bulletin.

To be a winner this month, just answer the simple question below;

The Question

What is the name of the new Head Protection Standard?

Answers by email please to info@prb-consulting.co.uk to be in with a chance of winning the £25.00 M&S voucher – Put QUIZ in the subject.

Closing Date: 30th September 2025



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Briefed By:		Briefers Role:	
Briefing Date:		Briefers Signature:	
Sentinel Coordinator:		Sentinel Coordinator Signature:	

By signing below, I confirm that I have received and understood the briefing material contained within this bulletin.

[illegible]