

#### 1. PURPOSE

The purpose of this procedure is to:

- Detail the specific arrangements necessary to manage the safe and efficient organisation and control of vehicular plant & cranes used or hired by VolkerRail(VR) within a specific worksite;
- Mandate compliance with the requirements of the Provision and Use of Work Equipment Regulations (PUWER), Lifting Operations and Lifting Equipment Regulations (LOLER) and Network Rail Infrastructure Plant Manual NR/L2/RMVP/0200;
- Underpin the requirements of element 9.36 of the company's integrated management system so as to maintain VR's On-Track Plant Operating Scheme (POS) and assist in complying with NR/L2/INI/CP0070 Principal Contractor Licensing Scheme.

#### 2. SCOPE

This procedure applies to all vehicular plant and cranes, including the organisation and control of vehicle travel movements and lifting operations whether internally or externally contracted, or supplied as part of a contract. Where VR is operating on sites under the control of third parties, or in joint venture with other companies then this procedure is the minimum standard which will apply.

Machines and equipment within the scope of this documentation include:

- On-Track Plant RRV's and Demountable Machines (previously known as RMMM).
- Excavators, Trucks, Dumpers, Dozers, Tractors, Rollers;
- Those machine and lifting equipment configurations deemed to be a Crane, such as Excavator cranes, Tele-handlers, Lorry Loaders, MEWPS, Fork Lift Trucks, Telescopic Mobile & Crawler Cranes ;
- Any other machines defined as 'self-propelled' and/or machines, accessories or attachments included within the definitions of lifting equipment set out in the Lifting Operations and Lifting Equipment Regulations, (LOLER);

Compliance with the requirements of this procedure is mandatory for all personnel who manage, supervise and/or carry out work activities associated with vehicular plant & cranes.

#### 3. REFERENCES (INPUTS) / RELATED DOCUMENTS

#### **British Standards**

- BS EN 1492 1 : 2000 + A1 : 2008 Flat Woven Webbing Slings
- BS EN 1492 2 : 2000 + A1 : 2008 Round slings
- BS 7121, Part 1, 2016 Code of Practice for the safe use of cranes, General
- BS 7121, Part 3, 2017 +A1 2019 Code of Practice for safe use of cranes, Mobile Cranes
- BS 7121, Part 4, 2010 Code of Practice for the safe use of cranes, Lorry Loaders

#### Legislation

- LOLER 1998 Lifting Operations & Lifting Equipment Regulations, (Including Code of Practice, and HSE Guidance)
- PUWER 1998 The Provision and Use of Work Equipment Regulations 1998, (including Code of Practice and HSE Guidance)

#### **Industry and Construction Standards**

- NR/L2/RMVP/0200 Infrastructure Plant Manual (All modules)
- NR/L2/CTM/025 Competence & Training in On-Track Plant Operation & Activities
- GE/RT8000 Rule Book Modules OTM and Handbook 15
- NR/L3/ELP/29987 Working On or About 25kV AC Electrified Lines
- NR/L3/CIV/0063 Piling, Drilling, Crane, MEWP SMPT and similar plant operations on or adjacent to the Railway
- RIS-1530-PLT Rail Industry Standard for Engineering Acceptance of On-Track Plant & Associated Equipment

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- RIS1710 Engineering Certification of Railbourne Plant and the Assessment of Non-Railbourne Plant **VolkerRail Procedures**
- PE321 Operational & Engineering Arrangements for the use of the KIROW Cranes within Possessions
- PE323 Avoidance of Danger From Overhead Power Lines
- CIV510 Management of Temporary Works
- CMS19 Competence & Training in On-Track Plant
- CMS25 Competence Management Arrangements for OTP Lift Planners

### 4. DEFINITIONS

Abbreviation / Term	Definition
ALARP	A measure of risk, signifying "As Low As Reasonably Practical"
ALO (Any Line Open)	Any line that is open to traffic that could be foreseeably fouled by a plant, attachment or loads associated with them <b>Covered in PE326M001</b>
Appointed Person (Lifting Operations)	Initially named in British Standards, the 'person appointed' with sufficient training, practical and theoretical knowledge and experie required to manage the variety and complexity of planned lifting operations. See also 'VolkerRail Lift Planners'
Banksman / Plant and Vehicle Marshall– (Non-rail mounted civil construction industry vehicles)	Traditionally the term Banksman / Plant and Vehicle Marshall has applied to those persons signalling a driver to guide the manoeuvr of their vehicle. A Banksman / Plant and Vehicle Marshall is requir direct vehicle/machine movement where there are hazards outside the driver/operator's field of vision.
Engineering Acceptance Certificate (EAC)	The document granted to show that the item of Plant complies with current Rail Industry Standards RIS 1530 PLT.
Engineering Conformance certificate (ECC)	The document granted to show that the item of Plant complies with current Rail Industry Standards RIS 1530 PLT.
Crane Controller - Rail (Industry equivalent to 'Crane Supervisor')	The Crane Controller (CC) is a person who is trained and certificat as competent in the organisation & control of crane lifting operation railway infrastructure sites.
	( <b>Note</b> : On non-Network Rail Infrastructure; this may be a 'Constructure'; this may be a 'Constructure'; cPCS or similar 'Crane Supervisor' with applicable Volkerl OTP specific 'Authority to Work' documentation)
Demountable Machine formally known as Rail Mounted Maintenance Machine, (RMMM)	A machine brought to site and placed on the rails and can travel of under its own power system Such vehicles are not allowed to oper outside possessions.
Hirer/Customer (employing organisation)	Is a Company, firm, person, Corporation or public authority taking Owner's Vehicle or Crane on hire and includes their successors ar personal representatives This is the person or organisation, (include their representatives or successors) that requires work to be carried out.
Lift Plan	Is a document that gathers all of the information regarding a partic lift into one place <b>Covered in PE326M003</b>
Machine Controller – (Rail Industry equivalent to Banksman / Plant and Vehicle Marshall )	The Machine Controller, (MC) is a person who has been trained, assessed competent and certificated with the principle duties of controlling On-Track Plant (OTP) operations in a railway infrastruc worksite.
	( <b>Note</b> : On non-Network Rail Infrastructure; may be a 'Construction Skills' - Construction Plant Competence Scheme (CPCS) or simila Banksman / Plant and Vehicle Marshall with applicable VolkerRai OTP specific Authority to Work documentation)
Machine or Crane Owner (plant	Is a Company, firm or person letting the Crane on hire and include



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Abbreviation / Term	Definition
Machine Operator	Is a competent person, responsible for the correct operation of the vehicle in accordance with the manufacturer's instructions and within the safe system of work; and who possesses current certification for the make and model of vehicle and lifting equipment; that they are operating.
Machine Planner	A competent person responsible for the production of planning documentation from including the most suitable on, off & cross tracking arrangements. This will be a representative of the Project Manager who is involved in the planning process and procurement of the type of required machine for the specific project. They in turn will liaise with any other Lift
Method Statement	Planner / Appointed Person for any other lifting requirements.Includes any version of such documentation as appropriate: MethodStatement, Site Specific Addendum, Work Package Plan or Task Brief
On-Track Machines	<ul> <li>as appropriate.</li> <li>Rail vehicles that can only travel on rail by virtue of a rail wheel guidance system and is allowed to travel in and outside of possessions on the open infrastructure.</li> </ul>
On-Track Plant, (OTP)	Possession Only Rail Mounted Machines and Road Rail Vehicles Classified as MEWP, Demountable Machine (RMMM) or RRV
Plant Operations Scheme (POS)	The approved organisation responsible for the provision and operation of on-track plant on Network Rail managed infrastructure and Network Rail projects. <b>Covered in PE326M002</b>
Rated Capacity Indicator, (RCI)	A device that is set up to give visible and/or audible warning when a crane is nearing the limit of its design capacity. These devices commonly automatically monitor load, & backward stability of the machine as well as monitoring the gradient and cant; and also offer automatic movement limitation of rotating, swivelling and extending parts of the machine
Rail Mounted Crane (RMC)	A rail mounted crane for in possession work that is hauled to site by locomotive including General Purpose Cranes, Kirow Rail Cranes, Breakdown Cranes and Twin Jib Track Layer
Road-Rail Vehicle, (RRV)	A vehicle that can travel on the road under and also travel on rail by virtue of a rail wheel guidance system under its own power system. Such vehicles are not allowed to operate outside possessions.
Safe Working Load (SWL)	The maximum mass that a lifting device may raise, lower or suspend under particular service conditions.
Site Specific Machine Work Plan	The VolkerRail 'Site Specific Machine Work Plan' sets out identified requirements, procedures and process relevant to machine operations and machine lift activities; AND may include/duplicate relevant information, which is also set out in the Work Package Plan issued by the Principal Contractor. Designed as a documented management system for all machine processes; any necessary documentation of lifting activities identified as non-'routine' and/or of more complex nature will be found within Plan in the Parts 5-7
Slinger	Is the term used for the Network Rail competence for the Competent Person who attaches or removes accessories for lifting and relays the Crane Controllers commands when instructed to do so.
Slinger / Signaller	Is the term used for the Construction industry for the CPCS / NPORS certification in respect of slinging operations, for the Competent Person who attaches or removes accessories for lifting, working under supervision of a Crane Controller / Crane Supervisor(CS).

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Abbreviation / Term	Definition
VolkerRail Lift Planners This is the VolkerRail, Rail	<b>The VolkerRail Lift Planners</b> will be given identified appropriate authorisation in writing to plan for machine-type operations as follows:
Industry equivalent to an Appointed Person for Lifting Operations	<ul> <li>Volker Rail OTP Lift Planners holding Sentinel OTP Single Lift Planner and are deemed competent to plan for the following types of machines:</li> <li>Road Rail Vehicles, (RRV) and Demountable Machines</li> <li>Mobile Elevating Work Platforms (MEWPs)</li> </ul>
	Civils Construction Lifting machines such as excavators, forklift trucks, lorry loaders and simple telehandlers
	Sentinel OTP Tandem Lift Planner are competent to plan for the following types of machines:
	Tandem (Multiple) Lifting with approved RRV Machines
	VolkerRail Lift Planners RMC, trained assessed and deemed competent to VolkerRail Training & Assessment Procedure (TAP701): • On-Track Machines, (OTM) Twin Jib Track Layer
	Rail Mounted Cranes (including General Purpose Cranes,
	Kirow Rail Cranes, Breakdown Cranes)
	<ul> <li>Tandem Lifting of Rail Mounted Cranes (including General Purpose Cranes, Kirow Rail Cranes, Breakdown Cranes</li> </ul>
VolkerRail Lift Planners	VolkerRail Lift planners who hold Construction Skills, CPCS
This is the VolkerRail, Rail Industry equivalent to an Appointed Person	<b>Appointed Person</b> – 'Crane Lifting Operations' can review contract and lift plans using <b>PE326F15</b> .
for Lifting Operations – continued	If authorised by the Professional Head of Plant Engineering or POS Compliance Manager and have been issued with a Authority to work card will be allowed to plan for the following types of machines: Mobile Telescopic Crane, Tower Crane and Crawler Crane operations
Working Load Limit (WLL)	The maximum load that an item of lifting equipment is designed to raise, lower or suspend under ideal conditions (by calculation)

#### 4.1 Cross industry reference of definitions management of lifting operations

The table below identifies the competence required when working on Network Rail managed infrastructure and equivalent industry terms when involved with lifting operations.

				Competence when	-	e of terminology used in ards below:		
		Activi	ty	working on NWR Managed Infrastructure	LOLER	Constructions Industry standard BS7121		
	oduc ft Pla		uthorises	Lift Planner	Competent Person	Appointed Person		
		s and Au ns on sit	ithorises e	Lift Planner	Competent Person	Appointed Person		
	ife co erati	ntrol of ons	lifting	Crane Controller	Appropriately Supervised	Crane Supervisor		
		es or rem ory for li	ioves an fting	Crane Controller or Slinger	Load Handler	Slinger / Signaller		
	elays omma		ontroller	Slinger	No equivalent term specified	Slinger / Signaller		
mo	ovem	ent of ve	nce for the chicles off loeuvring	Banksman / Plant and Vehicle Marshal (Does not include lifting operations)	No equivalent term	Banksman (Does not include lifting operations)		
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#### 5. PROCESS

#### 5.1 Responsibilities

The Vehicular Plant Planning 'team' consists of: **Project Manager** – The person whose holds responsibility for all the project matters inclusive of Plant requirements and logistics.

**Appointed Person / Lift Planner** - A person who holds an appointed person qualification such as "CPCS Appointed Person" for example and qualified to carry out and authorise Mobile Road Crane lifting operations

**VR Lift Planner RMC** - A person who holds an appointed person qualification such as "CPCS Appointed Person" for and has also been trained to carry out, plan and authorise Rail Mounted Crane lifting operations.

**VR OTP Lift Planner, RRV, MEWP, Telehandler, Lorry Loader** Crane - A person who holds the Network Rail competency OTP Lift Planning Single Lift for planning single lifts and would be required to hold the additional competency of OTP Lift Planning Tandem Lift if required to plan lifting with multiple machines, these are the competence identifiers for the person fulfilling the role of Appointed Person (Lifting Operations) on Network Rail managed infrastructure.

#### ALO - See PE326M001 Any Line Open Module

#### POS - See PE326M002 Plant Operations Scheme Module

**Crane Controller** - (for OTP and OTM) a person who holds the industry competence for controlling the movement of Mobile Cranes/Rail Mounted Cranes/RRV/MEWPS/Demountable Machines

**Crane Supervisor** - A Crane Supervisor is the person responsible for overseeing the movement of all lifting operations on a construction site to ensure the safety and effectiveness of the team.

**Drivers / Machine Operators** - A person who holds the industry competence for operating a specific type of Plant or Machinery

**Machine Planner** - The competent person responsible for the production of plant planning documentation following the guidelines detailed in the relevant sections of this procedure and Network Rail Plant Operations Manual NR/L2/RMVP/0200.

**Machine Controller** - a person who holds the rail industry competence for controlling the movement of RRV, Demountable Machines rail mounted or construction plant when it is working on or near the line

**Slinger or Slinger / Signaller** - Often the **Crane Controller/s** for OTP and OTM but must be a person who has been trained in the industry competency for slinger or Slinger / Signaller operation.

**Banksman / Plant and Vehicle Marshall** - must have been trained or assessed with regards to Banksman / Plant and Vehicle Marshall duties with regards to industry competency requirements.

#### 5.1.1. Project Manager

The Project Manager shall:

- Be responsible for ensuring that this procedure is followed and identifying the On-Track Plant Operating Scheme and Safety Certification requirements for the relevant plant and equipment working on the project.
- Establish the roles and responsibilities within the project team for delivery of this procedure.
- Ensure that Machine Work Plans and Lift plans are considered at the start of the project and identify a suitable and competent Machine / Lift Planner to be appointed to the project. Document general site-specific vehicular plant operations using Form PE326F01 Site Specific Machine Work Plan, Parts 1-4 and associated Lift Plans Forms PE326F05, F06 or F07.
- Requests for lift plans should be documented and forwarded to the Lift Planner in sufficient time using the Lift Plan Request Form **PE326M003F01**. Further guidance on the use of this form is detailed in **Module PE326M003 section 5.3.2**.
- Ensure that any approved sub-contracted CPCS 'Appointed Person, Lifting Operations' responsible for

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the organisation and control of 'Contract Lifts' and supply copies of their planning documentation to a VR CPCS Appointed Person in advance of lifts taking place. Carry out a review as detailed in section 5.3.6

- Agree the terms and conditions of sub-contracted vehicular plant and lifting activities under the Construction Plant Association (CPA) standard terms and conditions and supplementary conditions.
- Ensure that every lifting operation has a safe system of work.
- Monitor and review appointments regularly, particularly in the event of changing site conditions, complexity or workload.
- The Project Manager shall ensure that the project has a lift planner available either on call or on site when OTP is working on the infrastructure.
- The Project Manager shall ensure that only Sentinel registered Machine Operators, Machine Controllers, Crane Controllers and Operators are permitted to be employed for operating or controlling On-Track Plant, for information relating to the relevant qualifications for OTP Machine Operators and Controllers. For further guidance see **Module PE326M011**.
- The Project Manager shall ensure that ALL sub-contractor Driver / Machine Operators, Banksman / Plant and Vehicle Marshall, Slinger-Signallers, and Crane Supervisors hold CPCS or verified equivalent to CPCS certification for all the related plant & equipment activities they are being contracted to operate or control.

**NOTE:** When allocating a VR Lift Planner to the project, the variety and complexity of the lifting operations to be undertaken should be considered, as well as all the problems that may arise from proximity hazards and the environment. The appointee must also be given the necessary time and resources to carry out the duties involved.

Where a more complex lifting operation is required then the **Project Manager** should seek advice from the **Professional Head of Plant Engineering** or **POS Compliance Manager** as to the level of competence required for the **Lift Planner**.

#### 5.1.2. Machine Planner

The Machine **Planner** must visit and assess the entire site, considering all relevant factors and any additional considerations of a site-specific nature prior to preparing the plan.

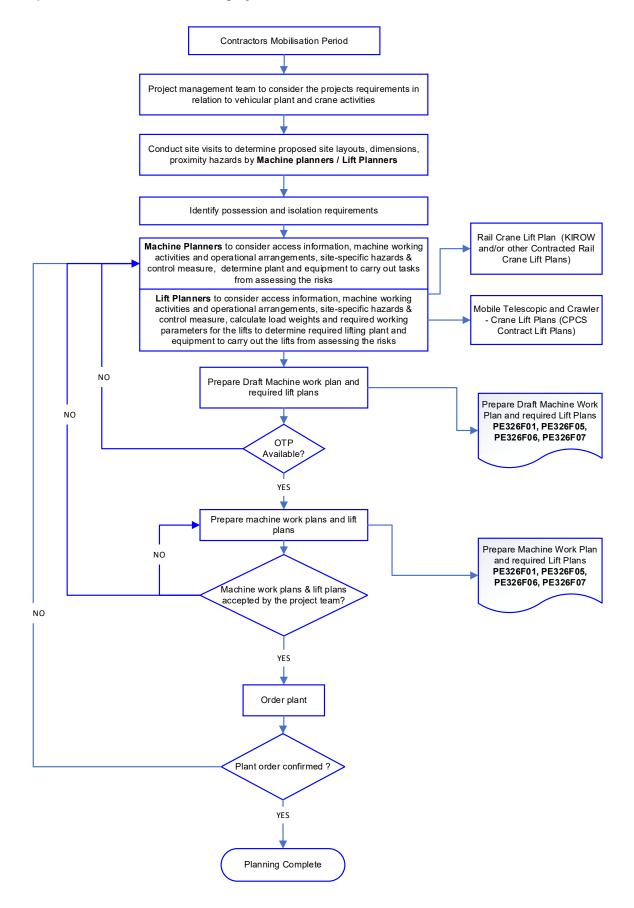
**Note:** The Machine Planner should also be the Site Lift Planner as they are the deemed as competent in planning OTP operations.

The Machine **Planner** will complete the VR Site Specific Machine Work plan **PE326F01** which shall identify the safe system of work required for the plant to carry the work and any the arrangements required so that work can be completed safely by identification of hazards, risks and restrictions associated with planned work requirements. This should also include consideration of the interfaces between equipment, infrastructure, people and process and how they may change within the geography of the work site and stages of work and external influences.

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Site Specific Machine Work Planning System Process Flow-chart



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#### 5.1.3. VolkerRail Lift Planner

The VR Lift Planner has responsibility for the safe organisation and control of their planned lifting operations and to provide a safe system of working by properly planning the lifting operation, including preparation of a comprehensive Site Specific Machine Work Plan, Lifting Plans, Complying with Network Rail Plant manual NR/L2/RMVP/0200 and guidance in **Module PE326M003** and associated modules.

Liaise with sub-contractor's crane teams, correlating Rail Crane Lift Plan (Kirow and / or other Contracted Rail Crane Lift Plans) and Mobile Telescopic and Crawler - Crane Lift Plans (CPA Contract Lift Plans) into the framework of the Site Specific Machine Work Plan.

#### 5.1.4. Crane Supervisor / Crane Controller for OTP

The **Crane Supervisor / Crane Controller** for OTP and OTM directs and supervises the lifting operation in accordance with the site-specific lift/work plan.

They must:

- Be authorised, competent, suitably trained and have sufficient experience to carry out these duties particularly during tandem lift operations:
- Crane Supervisor = Crane Supervisor CPCS
- Crane Controller = Appropriate Sentinel MC/CC Scheme Competency

(Note: Tandem lift is an additional competence)

Guidance on when a Crane Controller is required is detailed in **Module PE326M003**.

#### 5.1.5. Drivers / Machine Operators

Drivers / Machine Operators of all vehicular plant, machines and cranes in VR Project sites must:

• For all On Track Plant (OTP) be competent and hold the relevant Sentinel competency and Authority to Work Card for the relevant machine and attachments in accordance with NR/L2/CTM/025 and VR CMS19 - Competence and Training in On-Track Plant.

Further guidance on OTP competencies is detailed in **Module PE326M011**.

• For Civils Construction Plant be competent and hold a current Competence Card – Construction Plant Competence Scheme, (CPCS) Card or National Plant Operator Registration Scheme, (NPORS) Card for operating the appropriate category of vehicle, machine or crane.

Further guidance on CPCS competencies can be found on the scheme administrators' website at <u>www.nocnjobcards.org</u>

Information regarding plant competencies for VR staff can be sourced from VR Training and Competence Team.

#### 5.1.6. Slinger or Slinger / Signaller

The person holding either **Slinger or Slinger / Signaller** competence are deemed to be the competent person who attaches or removes any lifting accessory in accordance with the lift plan to the load.

All Network Rail Crane Controllers have to be qualified as a Slinger as a pre requisite.

Every Crane used on VR Sites must have at least one competent Slinger or Slinger / Signaller allocated to it whilst being set-up or working. When OTP Crane Controllers competence is not required they must hold appropriate Slinger Signaller 'Construction Skills CPCS Cards' or 'NPORS Cards'

#### 5.1.7. Machine Controllers, Banksman or Plant and Vehicle Marshall

The **Banksman** or Plant and Vehicle Marshall must hold a valid competence to be deemed qualified to direct plant and vehicle movements around a site, providing no part of the machine or its load can come within 4m of any line or lines.

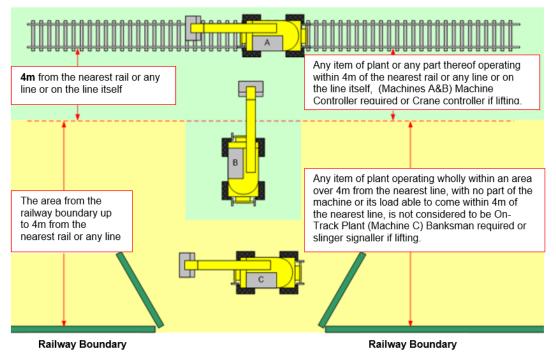
For machines either Civils Construction Plant or OTP where the machine or its load is required to go within 4m of any line or lines then a qualified **Machine / Crane Controller** is required.

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Illustration where On-Track Plant controls apply



#### 5.1.8. Subcontractor Contract Lifting

Each subcontractor carrying out contract lifting operations will be required to provide their own **Appointed Person / Lift Planner** and where VR is the Principle Contractor; these **Appointed Persons** and their lifting plans are subordinate to the **VR Lift Planner**, who must be satisfied with Lifting Operations and Lifting Equipment Regulations compliance.

As set out in 5.1.3, the **VR Lift Planner**, as the **Project Manager's Lift Planner**, will liaise with sub-contractor's crane teams, correlating Rail Crane Lift Plans, (KIROW and / or other Contracted Rail Crane Lift Plans) and Mobile Telescopic and Crawler - Crane Lift Plans (CPA / Contract Lift Plans) into the framework of the Site Specific Machine Work Planning System.

**NOTE**: All subcontractor Appointed Persons must have a CPCS competence card and adequate experience to carry out their duties competently.

#### 5.1.9. Subcontract POS Provision

Where a **Project Manager** has the need to subcontract out POS Provision this will only be when the relevant resources are not available through VR or it is part of a package of works, then they shall ensure that the proposed POS provider is on the approved supplier list for POS provision.

The **Project Manager** is to ensure that the POS supplier submits all POS paperwork and lift plans for checking by a **VR Lift Planner** who is part of their Project or Business stream, to ensure they cover all the relevant work and have the appropriate supervision and control measures in place, and follow the requirements of the NR/L2/RMVP/0200 Infrastructure Plant Manual, and all deliveries are incorporated to follow the VR procedure **SAF23**.

The subcontract POS providers must only utilise their own POS licence to deliver the works for VR as per the issued subcontract and cannot utilise other POS providers licence to deliver the works, but they may cross hire other providers OTP, plant and equipment in to work for them.

The **Project Manager** must arrange for relevant qualified staff to conduct relevant assurance and monitoring checks are carried out on the POS provider when they are delivering works.

#### 5.2 Delivery and Collection

• For plant and material delivery the **Project Manager** shall ensure that all parties exchange information about the main risks involved and agree who will do what to control the risks.

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- The sending out of the Site Specific Machine Work Plan PE326F01 and other relevant documentation and information to other parties involved in the delivery chain, process for PE326F01 detailed in 5.3.1
- **Project Managers and VR Lift Planners** shall ensure that where lift plans are required for delivery and collections of plant and materials, these are produced as detailed in **5.3.3**., or if a third party produces the lift plan then the lift plan is reviewed by the VR lift planner.
- **Project Managers** must assess delivery and collection risks in line with VR procedure SAF23.

#### 5.3 Documented Planning

Movements of all vehicular plant and cranes on Network Rail or civil construction sites are only to be carried out as long as they are supported by a documented Plant SSOW, including suitable risk assessments and be authorised.

Copies of Form **PE326F01** Site Specific Machine Work Plan Part 1-4 are to be briefed out and held at a worksite by all **POS representatives, Banksman / Plant and Vehicle Marshall, Machine Controllers, Crane Supervisors and Crane Controllers**.

#### 5.3.1. Site Specific Machine Work Plan Parts 1-4 (Form PE326F01)

Form **PE326F01** has been developed to characterise the main site specific elements of documented planning requirements to produce a Plant SSOW as follows:

- Part 1: Machine and Access Information
- Part 2: Site Description, layout & dimensions
- Part 3: Machine Working Activity and Operational Arrangements
- Part 4: Site-specific hazards & control measures
- The Site Specific Machine Work plan **PE326F01** documents the safe, planned execution of all vehicular plant 'machine' and 'lifting' activities associated with multiple site specific planned methodologies and safe systems of work. The plan forms one of the documents for the **POS representative** to brief out and details the relevant information for MC / CC in the execution of their duties.
- The plan shall follow the requirements of the **Network Rail Plant manual NR/L2/RMVP/0200** to ensure compliance when working on NRMI, as well as the relevant VR procedures.
- The plan shall be comprehensive and document the safe, planned execution of all vehicular plant machine and lifting activities associated with multiple site specific planned methodologies and safe systems of work.
- The plan addresses the system by which all the planned operations can be documented and referenced to within Work Package Plans (WPP). The application of the WPP shall cover the range of accepted common activities 'On or near the line' so that sections within the template can easily relate to and encompass all machine operations within the boundary fence and also out into non-rail civil construction worksites not on or near the line and associated risks considered, as well as plant deliveries and collections.
- Information for crane operations piling, drilling, MEWP or Self-Propelled Modular Transport (SPMT) that are carried out 'On or adjacent to' Network Rail Managed Infrastructure but not 'On or near the line' is covered in NR/L3/CIV/0063 Piling, Drilling, Crane, MEWP and SMPT operations adjacent to the Railway.

#### 5.4 Exclusion zones

All planning for OTP, Civil Construction plant and crane lifting operations shall take into account the required exclusion zones, the **Planner** is to document the required exclusion zones. The minimum exclusion zone shall be defined by the OTP's maximum working radius + length of any load (irrespective of orientation of the load) or 10m ,unless a specific activity or attachment stipulates a required exclusion zone, in line with the requirements of NR/L2/RMVP/0200 Network Rail Infrastructure Plant Manual as well as any industry standards and best practice guides.

#### 5.4.1. Transit in a worksite

- When planning for OTP, consideration will be given to transit moves including the distances to be travelled and the actual time that would be required to complete the movements.
- The Site-Specific Machine Work plan **PE326F01** shall specifically document any limits of travel for the OTP.

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Any areas that travel is **not** permitted in shall be clearly documented in the **Site-Specific Machine Work Plan PE326F01** with clear track location identified and shall have clear physical demarcation on site with relevant "**Stop No Rail Plant Past This Point**" boards placed to limit travel of the OTP, (see figure 1 below).

This could also be used at the start of possessions where OTP could be on tracked when the worksite is granted, but travel is limited whilst Points Stop Equipment has been placed then limit of travel demarcation is placed clear or any track circuits that may affect the operation of other infrastructure equipment If this is placed to avoid level crossings and track circuits that deadlock points, then the location is to be determined by consultation with the relevant signalling teams.

The **POS Representative** is to ensure that these are to be placed according to the location documented in **PE326F01** before any OTP is authorised to on track.

For areas where limit of travel is near Live Electrified Lines then follow instructions in section 5.6.1

- Movement speeds will be agreed with all parties involved with the OTP and authorised by the ES.
- The location of the Machine Controller will be documented in the PE326F01 at the planning stage.
- All movements will be planned for the OTP cab or in the case of a MEWP the basket to be at leading end when possible, to ensure the operator has a clear unrestricted view of the line ahead. If the OTP can be turned to ensure the operator has a clear unrestricted view of the movement, then it will be turned.
- Unless authorised under documented pre planned send and receive arrangements, the **Machine Controller** will walk ahead of all movements.
- A minimum distance of 100 meters is to be kept between items of plant travelling on the same line.
- All transit moves will be planned in line with the relevant requirements of GERT8000 Rule Book and NR/L2/RMVP/0200 Network Rail Infrastructure Plant Manual.



Figure 1: Example "Stop No Rail Plant Past This Point" board.

#### 5.4.2. On Site Communications

- On site communications shall include the provision of approved digital full duplex communications system when undertaking safety critical activities with plant either on or off the track.
- Contingency planning should consider to plan extra sets of duplex communications system in case this safety critical equipment fails.
- OTP operations **shall not** commence work if the full duplex communication system fails prior to the start of work.
- Use full duplex communication systems between travelling machines.
- The rules concerning on site communication has been set by Network Rail standard NR/L2/RMVP/0200 Infrastructure Plant Manual:
- 5.4.3. Acceptance of Site Specific Machine Work Plan Parts 1-4 (Form PE326F01)

The **Project Manager** shall ensure that Site Specific Machine Work Plan Parts 1-4 (**Form PE326F01**) are 'accepted and signed off by the project management team' not later than 3 working days prior to the machine and crane working taking place, to ensure the plans cover the work required by the project team. Unauthorised plans printed directly without signature are not valid.

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The Site Specific Work Plan must be briefed to the **POS Representatives** at least 24 hours in advance of the working shift.

5.4.4. Site Specific Machine Lift Plans Parts 5-7 (Forms PE326F05, 06 and 07)

All planning for OTP, Civil Construction plant and crane operations shall be in line with the requirements of NR/L2/RMVP/ 0200 Network Rail Infrastructure Plant Manual as well as industry standards and best practice, the regulations within the LOLER and the best practice within the British Standard 7121 Series, 'Code of Practice for the Safe Use of Cranes'.

VR Lift Planners shall complete Part 5, 6 and 7 Lift Plans which are the most frequently produced lift plans within VR, Planners need to consider plant delivery and collections especially where attachments need to be loaded and unloaded.

Guidance on Planning Lifting Operations is detailed in **Module PE326M003**.

5.4.5. Acceptance of Site Specific Machine Lift Plans Parts 5-7 (Forms PE326/F05, 06 and 07) The **Project Manager** shall ensure that Site Specific Machine Work Lift Plan Parts 5-7 (Form PE326F05, 06 and 07) are 'accepted and signed off by the project management team' not later than 3 working days prior to the lifting operations taking place, to ensure the plans cover the work required by the project team. Unauthorised plans printed directly without signature are not valid.

The Lift plans must be briefed to the **POS representatives** at least 24 hours in advance of the working shift.

5.4.6. Kirow Crane sub-contracted Contract Lifts

For Kirow rail crane sub-contracted contract lifts, the planning shall be completed by the VR POM Kirow team in liaison with the Site **VR Lift Planner and Project Manager**. The VR POM Kirow team shall produce the lift plans for the Kirow crane under **PE321**.

5.4.7. Mobile cranes

Noting that VR does not own any Mobile, Telescopic or Crawler Cranes, when they are required to be used the **Project Manager** has two options available as follows:

5.4.7.1 Contract - Lift Employ a Contractor to carry out the lifting operation

Example Contract Lift:

If VR require any load or loads to be moved and enters into a contract lift directly, the approved contracted Crane Contractor shall undertake the work on VR's behalf. This contract will encompass all necessary planning, provision of personnel and equipment, and the actual execution of the lift.

VR must state within the contract that all work shall be carried out in accordance with BS 7121 Part 1, and that the 'contract lift party' will appoint an 'Appointed Person, Lifting Operations'.

The **Project Manager** should instruct the procurement team of any additional insurance requirements required by the contractor.

VR shall supply all necessary information to the subcontractor i.e. load(s) to be lifted, ground conditions, services etc.

The subcontractor is responsible for:

- Supplying the 'Appointed Person'
- Planning the lift and operating a safe system of work including provision of the lifting team in accordance with LOLER & BS 7121
- Providing equipment that is properly maintained, tested and certified
- Providing a competent operator
- Providing accurate support medium (e.g. ground) loading information to VR

Under Contract Lift conditions, VR still retain certain duties and liabilities including the provision of correct and adequate information on the load(s) being lifted and providing adequate / stable ground conditions.

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VR must also be satisfied that the contract lift party has the necessary competence to carry out the work required in accordance with BS 7121. This is determined by the submission of contractor lift plans for review by a fully competent **CPCS qualified Appointed Person** at least 3 working days prior to the lifts taking place and completion of the **PE326F15 Contract Lift Plan Evaluation Check Sheet**, ensuring LOLER & BS7121 compliance and compatibility with all site specific documentation.

#### 5.4.7.2 Hired Crane - Hire a crane

Example Hired Crane:

If VR require a load or loads to be moved - proposes the use of a hired crane and the planning and execution of the lift.

The **Project Manager** will appoint an in-house CPCS card scheme 'Appointed Person - Lifting Operations'. The Appointed Person may also be the **Project Manager's VR Lift Planner** (if qualified as a CPCS Appointed Person – Lifting Operations) and be authorised by the **Professional Head of Plant Engineering or POS Compliance Manager**.

The owner of the hired crane has a duty to provide a competent operator and a crane that has been properly maintained and inspected, thoroughly examined, tested and certified. Evidence of this must accompany it.

However, notwithstanding any advice offered by the crane owner, the responsibility for ensuring that the crane is of a suitable type, size and capacity for the task to be undertaken, and for planning, executing the operation and ensuring periodic thorough examinations are undertaken, remains with VR.

#### 5.4.8. Generic Lift Plans

In the case of construction lifting activities, low risk, repetitive and 'routine' operations, such as many of those commonly associated with Tele-Handlers, Fork Lift Trucks & Lorry Loaders, delivering, loading and unloading materials and plant to depots and compounds that are not 'On or Near the Line', the often sub-contracted 'routine' lifts must be planned in the first instance for a particular machine and equipment type. It is to be expected that 'generic' plans will be documented and held on the vehicle for the Operator / Banksman's use. This shall be verified by the **Project Manager's VR Lift Planner**.

The carrying out of 'routine' lifts, immediately organised and controlled by the Operator and Banksman, has not removed any legal responsibility from the **Project Manager**. In these instances, the **Operator** has merely been given authority to act as the **Project Manager's VR Lift Planner** for that activity and is satisfying the Employing Organisation's overall planning requirement.

#### 5.5 The Immediate Organisation and Control of Lifts

The immediate operational Organisation and Control of lifting activities is the responsibility of the Crane Controller or Crane Supervisor in application of the appropriate lifting plans. The Crane Controller or Crane Supervisor will contact the VR Lift Planner in accordance with **Module PE326M003** when alterations are required or parameters have changed.

#### 5.6 Working in Electrified Areas

#### 5.6.1. General Requirements

Any work undertaken in AC electrified line areas shall have a detailed safe system of work identifying isolation requirements, as detailed in the Network Rail Plant manual NR/L2/RMVP/0200.

Where an isolation is required, it shall be implemented in accordance with NR/L3/ELP/29987. Limitations are shown on the Product Acceptance (PA) Certificate or Engineering Acceptance.

Certificate / Engineering Conformance Certificate (EAC/ECC) shall be adhered to.

Any areas within a worksite / Siding possession where there are sections of Live Electrified lines that OTP cannot approach which are not covered by a Overhead Line Permit shall be clearly documented in the Site-Specific Machine Work plan **PE326F01**, with clear track locations identified and shall have clear physical demarcation on site with relevant **"Stop No Rail Plant Past This Point"** boards placed to limit travel of the OTP towards the electrified line (see figure 1 in section 5.4.1). This shall be positioned at least 20m plus maximum jib length of the machine and any load from the nearest part of the Live Electrified Line when the machine is positioned on the same line.

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Where there are electrified lines adjacent to the line that OTP is working on, machines shall have the relevant slew limiters set to ensure that any part of the machine and load cannot come within 2.75m of the Live electrified line, the distance the limiters are to be set at is to be clearly documented in the **Site-Specific Machine Work Plan PE326F01**.

The **POS Representative** is to ensure that any limit of travel boards are placed according to the location documented in **PE326F01** before any OTP is authorised to on track.

Work Planners shall firstly apply for an isolation.

#### 5.6.2. Working under Live OLE

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Any operations carried out by OTP and OTM under live OLE, must meet the requirements of the Network Rail Plant manual NR/L2/RMVP/0200 and section 5.5.3 below.

5.6.3. Application for Working Under Live

Where an isolation of OLE is not available, or the **Project Manager** requires, working, or transit moves to take place under live OLE, the planner in consultation with the Contractors Responsible Engineer - Overhead Line (**CRE, OLE**) shall check the requirements of the Network Rail Plant Manual NR/L2/RMVP/0200 and associated documents. A comprehensive risk assessment shall be undertaken following the requirements of standards, documenting the control measures to be put in place to mitigate the risks. The types of plant and confirmation that it is permitted to travel under energised OLE on the EAC/ECC and the limits of operation shall be identified.

This risk assessment and a completed NR/L2/RMVP/0200/F0462, Movement of OTP Under Energised OLE Planning and Approval form, shall in the first instance be sent by the **CRE**, **OLE** to the **Professional Head of Contact Systems or HSQE Director** for review. If the review concludes that the activity with the applied controls is acceptable the risk assessment shall be sent to the relevant Infrastructure owner for a peer review and authorisation. In the case of Network Rail this shall be the Designated Project Engineer (DPE).

#### 5.6.4. External Overhead Lines

Safe systems of Work shall detail areas where third party cables cross the railway. Guidance on External power lines is detailed in **PE323**.

#### 5.7 Transporting Loads on OTP trailers

When planning for the use of any OTP trailer and placing loads onto or from the trailers the planner must follow all the requirements detailed in the **Infrastructure Plant Manual NR/L2/RMVP/0200/P509** Trailers and Wheeled Attachments.

How loads will be secured to the trailers to prevent movement must be identified at the planning stage, the **project team** needs to make provision for the identified securing equipment to be available where the trailers will be loaded.

It is the responsibility of the project team to source the correct type of load restraints for the loads that will be carried on trailers, unless the load is a specific attachment for OTP trailers like ballast boxes, cable drum carriers and personnel carriers that have specific securing methods then these will be provided by the plant supplier.

If specific loading and securing arrangements are required, then this is to be clearly documented in the **Site-Specific Machine Work Plan PE326F01** 

#### 5.8 Ground Conditions

The VR Lift Planner must ensure that the loads imposed by mobile road cranes or major items of vehicular plant and equipment relying on outriggers for stability (e.g.: concrete pumps, aerial platforms, lorry loaders, Tele-handlers etc). can be safely transmitted into the ground by seeking the assistance of a competent engineer / site Temporary Works Coordinator.

Any temporary work requirements to enable Plant operations to take place when working with construction plant, or OTP working when not working rail mounted, or for utilising machines that would require stabilisers or outriggers, is to be deployed.

Any temporary works shall conform to VR procedure CIV510 – Management of Temporary Works.

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Advice on the size of the imposed loads must be sought from the crane Owner, or VR's **Professional Head of Civil Engineering and Multi-disciplinary Design.** 

A CIRIA guide, "Crane Stability on Site C703" also deals with the subject of Ground Conditions.

Further Guidance on Crane outrigger loadings can be found in Module PE326M012 - Ground Conditions.

#### 5.9 Plant and Equipment Maintenance and Inspection

#### 5.9.1 Civils Construction Plant

The **Project Manager** shall ensure that all plant and equipment is maintained in accordance with the manufacturers' recommendations and inspected on a regular basis so as to be in efficient working order and in a good state of repair.

The following records shall be supplied by the plant company where hired direct by VR. Where plant is brought in by a subcontractor they must also hold these records on site:

- Manufacturer's maintenance instructions
- Manufacturer's handbooks
- Test or calibration and Declaration of Conformity certificates (if applicable)
- Specific operating instructions
- Evidence of thorough examination certificates

A copy of this documentation shall be held in the site files while the equipment is under company control and be available for inspection in the event of audit or investigation.

If any plant or equipment is supplied in a poor state of repair and is not fit for use, or the machine is not accompanied by the relevant documentation, then the equipment must be quarantined, and the supplier contacted. The equipment must not be used until the issues have been rectified or the equipment is replaced.

All plant and equipment on site must be inspected at suitable intervals to ensure that it is safe to use and does not deteriorate or becomes liable to create a dangerous situation for the user or others. The machines shall be inspected daily by the **Operator**.

For non OTP Plant Hired / Owned directly by VR the following Hired Plant Inspection Sheets shall by utilised for daily operator inspections.

- Telescopic Handlers, PE326F09, Telehandler Operator Plant Check Sheet
- Excavators, **PE326F10**, Excavator Operator Plant Check Sheet
- Dumper, **PE326F11**, Dumper Operator Plant Check Sheet
- MEWP, PE326F12, MEWP Operator Plant Check Sheet
- Forklift, **PE326F13**, Forklift Operator Plant Check Sheet
- Any other operated Plant not listed, **PE326F14**, Operator Plant Check Sheet

For Plant brought in by a subcontractor they must have adequate plant inspection sheets or utilise the relevant VR Plant inspection Sheets.

#### 5.9.2 OTP, OTM plant & equipment

The **Project Manager** shall ensure that all OTP, OTM Plant and equipment is maintained in accordance with the owners maintenance schedule so as to be in efficient working order and in a good state of repair.

The following records shall be supplied by the plant company where hired direct by VR. Where plant is brought in by a subcontractor, they must hold these records on site:

- Engineering Conformance Certificate (ECC) or Engineering Acceptance Certificate (EAC)
- Machine log book
- Maintenance instructions
- Brake test certificate
- Test or calibration and Declaration of Conformity certificates (if applicable)
- Duty charts

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- Manufacturer's handbooks
- Specific operating instructions
- Evidence of thorough examination certificates

#### 5.10 OTP Recovery Plan

There is a requirement when operating OTP on Network rail in relation to contingency planning when it has failed on the railway infrastructure and requires removal. It details the requirements to produce a Recovery Plan prior to OTP activities being undertaken, for the safety of both the OTP and the site in the event of a failure. It also includes the requirements to undertake assessments of both the OTP and the infrastructure and the recovery of the OTP in the event an on-site repair cannot be carried out.

This is documented in Module PE326M010 OTP Recovery plan.

#### 5.11 Maintenance of Records

Record	Retained By	Retention Period
All associated with procedure	Project Team	Project completion + 3 years

#### 6. ASSOCIATED GUIDANCE & INFORMATION

- M&EE Codes of Practice
- SFPSG/CPA Guidance on Lifting Operations in Construction When Using Excavators
- SFPSG/CPA Guidance on the safe use of Dumpers
- CPA Guidance on the safe use of Lorry Loaders
- CPA Good Practice Guide Requirements for Mobile Cranes Alongside Railways Controlled by Network
  Rail
- SFPSG/CPA Guidance on the safe use of Telehandlers in construction
- SFPSG/CPA Guidance on Lifting and travelling with suspended loads using Telehandlers
- CIRIA 'C703' Construction Industry Research and Information Association- Crane Stability on Site
- Brief Guide to The Work at Height Regulations 2005
- HSG144, The Safe Use of Vehicles on Construction Sites
- HSG246 safety in the storage and handling of steel and other metal stock
- INDG290 Lifting equipment at work a brief guide
- INDG291 Providing and using work equipment safely a brief guide
- WTCHK1 Site inspection workplace transport checklist
- GEIS6 The selection and management and use of mobile elevating work platforms
- INDG199 Workplace Transport Safety An Overview

#### 7. DOCUMENTATION (OUTPUTS)

Modules

- PE326M001 Any Line Open Working
- PE326M002 Plant Operations Scheme
- PE326M003 Lift Planning
- PE326M004 Send and Receive
- PE326M005 Handling Rail & Stacking Rail
- PE326M006 Carrying Out Piling Operations
- PE326M007 Road rail Access points
- PE326M008 Telescopic Handlers
- PE326M009 Lifting of Track Panels Using Four-Legged Chain Slings
- PE326M010 OTP recovery Plan

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- PE326M011 OTP Controller & Operator Competency
- PE326M012 Ground Conditions

#### Forms

- PE326F01 Site Specific Machine Work Plan (Parts 1 4)
- PE326F05 OTP Crane Lift Plans (Part 5)
- PE326F06 Tele-Handler, Fork Lift Truck and Lorry Loader Crane Lift Plans (Part 6)
- PE326F07 MEWP Operation (Part 7)
- PE326F08 Machine and Crane Controllers Checklist (Part 8)
- PE326F09 Telehandler Operator Plant Check Sheet
- PE326F10 Excavator Operator Plant Check Sheet
- PE326F11 Dumper Operator Plant Check Sheet
- PE326F12 MEWP Operator Plant Check Sheet
- PE326F13 Forklift Operator Plant Check Sheet
- PE326F14 Operator Plant Check Sheet
- PE326F15 Contract Lift Plan Evaluation Check Sheet

For the Southern Integrated Delivery (SID) VR team **Lift Planners** on the project will have the following document form variations, all approved PE326 documents on the IMS will be prefix of (SID).

These documents are part of assisting integration into the VR process and are for the SID team only to utilise these <u>cannot be used on any other VR projects</u>.

Wherever there is a reference to PE326F01 in the VR procedures this will be replaced with (SID) PE326F01.

Wherever there is a reference to PE326F05 in the VR procedures this will be replaced with (SID) PE326F05.

There are two new forms (SID) PE326F16 Rail Drag, (SID) PE326F17 Trailer plan these are specific to Southern Integrated Delivery.

- (SID) PE326F01 will be used in lieu of PE326F01- Site Specific Machine Work Plan (Parts 1 4)
- (SID) PE326F05 will be used in lieu of PE326F05- OTP Crane Lift Plans (Part 5)
- (SID) PE326F16 Rail Drag will be utilised to produce plans for Dragging Rail by the SID team.
- (SID) PE326F17 Trailer plan will be used for producing plans for utilising OTP trailers by the SID team.

#### 8. ISSUE RECORD

Issue	Date	Comments
1 -6	March 2003 to April 2021	For issue record, please refer to Issue 6 of this procedure.
7	10/02/2023	Complete rewrite of PE326 with extensive additions and requirements necessary to avoid reoccurrence of incidents. This new procedure has been developed to detail the specific arrangements necessary to manage the safe and efficient organisation and control of Vehicular Plant and crane operations used or hired by VolkerRail (VR) within a specific worksite.
8	30/05/2024	Review of document only change made new section added, 5.7 Transporting Loads on OTP Trailers. Sections 5.8 onwards numbering has changed.

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Issue D	Date	Comments
9	10/06/2024	Changes new section 5.1.9 on Subcontract POS provision Additions to section 5.4.1 Transit in a worksite. Additions to section 5.6.1 Electrified lines. Revised wording in section 5.7 Transporting Loads on OTP Trailers. Four new SID Specific forms.

#### 9. WHAT HAS CHANGED IN THIS LATEST ISSUE AND WHY

Changes and the reasons behind the changes are highlighted in the PowerPoint briefing material.

- New section 5.1.9 on Subcontract POS provision
- Additions to section 5.4.1 Transit in a worksite, around placing limit of travel movements.
- Additions to section 5.6.1 Electrified lines, around placing limit of travel movement boards to separate nonelectric lines from LIVE electrified lines until an isolation is in place.
- Revised wording in section 5.7 Transporting Loads on OTP Trailers, more descriptive wording around responsibilities.

New forms for use by the Southern Integrated Delivery (SID) VR OTP planners. Wherever there is a reference to PE326F01 in the VR procedures this will be replaced with (SID) PE326F01.

Wherever there is a reference to PE326F05 in the VR procedures this will be replaced with (SID) PE326F05.

There are two new forms (SID) PE326F16 Rail Drag, (SID) PE326F17 Trailer plan these are specific to Southern Integrated Delivery.

- (SID) PE326F01 will be used in lieu of PE326F01- Site Specific Machine Work Plan (Parts 1 4)
- (SID) PE326F05 will be used in lieu of PE326F05- OTP Crane Lift Plans (Part 5)
- (SID) PE326F16 Rail Drag will be utilised to produce plans for Dragging Rail by the SID team.
- (SID) PE326F17 Trailer plan will be used for producing plans for utilising OTP trailers by the SID team.

#### 10. BRIEFING REQUIREMENTS

All new employees will receive an introduction to the Integrated Management System (IMS) at induction, according to the nature of the role.

All employees with an email address receive the 'Record of Revisions' each month, which details changes to the IMS. All Line Managers retain the responsibility to ensure their staff are briefed on changes as appropriate.

The following table defines how revised issues of this document are briefed to existing employees according to related specific responsibilities.

This is determined using the 'RACI' principle. Those roles identified as 'Responsible' and 'Accountable' should receive a formal awareness briefing facilitated by the Document Owner.

	Discipline			Role			RA	ACI Type of briefing				
	Engineering				Chief Engineer				Inf	Informed Awareness		
Engineering				Professional Head of Plant Engineering			Consulted		Detailed			
	Engineering			Professional Head of Contact Systems			Consulted		Detailed			
Engineering			Professional Head of Civil Engineering and			Consulted		Detailed				
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Discipline	Role	RACI	Type of briefing	
	Multi-disciplinary Design			
Engineering	POS Compliance Manager	Consulted	Detailed	
Project Management	Project Manager	Responsible	Detailed	
Senior Management	General Manager	Responsible	Detailed	
Senior Management	Business manager (POM)	Responsible	Detailed	
Delivery	Senior Operations Manager (POM)	Responsible	Detailed	
Delivery	Operations Manager	Responsible	Detailed	
Delivery	Operations Manager (POM)	Responsible	Detailed	
Delivery	OLE Plant Operations Manager	Responsible	Detailed	
Delivery	Construction Manager	Responsible	Detailed	
Delivery	Site Supervisors	Informed	Detailed	
Delivery	Temporary Works Coordinator	Informed	Detailed	
HSQES	HSQES Director	Consulted	Detailed	
HSQES	H&S Manager	Consulted	Detailed	

Competence	RACI	Type of briefing
Lift Planner	Responsible	Detailed
Machine Controller / Crane Controller	Responsible	Detailed
POS Representatives	Responsible	Detailed
OTP Operators	Responsible	Detailed

Document Control	Type of briefing		
Lift Planner Pack	Hard copy issue		
VR/POS Rep Pack	Hard copy issue		

### 11. IMS AUTHORISATION

#### Document owner approval:

Neil Hewitt, Professional Head of Plant Engineering, 10/06/2024

#### **Document author:**

Andrew Shipley, POS Compliance Manager, 10/06/2024

#### Approval for IMS:

Paula Roberts, IMS Coordinator, 10/06/2024

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