

Reporting of hazardous conditions

Working Together for Safety Recommendation 037E/2020



SfS
Samarbeid for Sikkerhet

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Introduction

The reporting of hazardous conditions is important in order to ensure continual improvement and reduce incidents and events that may lead to incidents. Section 20 of the Petroleum Safety Authority's Management Regulations also requires that hazard and accident situations that may result in or have resulted in acute pollution or other damage are registered and investigated in order to prevent recurrences and secure learning.

Section 53 of the Petroleum Safety Authority's Technical and Operational Regulations sets requirements regarding the provision of information about health risks and the risk of accidents associated with the work that shall be carried out.

The Working Environment Act and the Internal Control Regulation require the employer to:

- Maintain an overview of hazards inherent in the working environment
- Assess the risk of harm to health and accidents
- Initiate activities and implement measures to prevent and reduce risk
- Follow up, correct and improve defects and omissions

For those who are employed and carry out work on Norwegian ships, the Ship Safety and Security Act and Employment protection etc. for employees on board ships (the Ship Labour Act) apply, along with associated regulations including the Regulations regarding the working environment, health and safety.

Purpose

The purpose of this recommendation is to:

- Create a common understanding of HSE risks associated with hazardous conditions
- Create a culture in which it is expected that anyone who observes undesirable or hazardous conditions assumes personal responsibility and takes immediate action, as long as this does not place the observer or others in danger
- Create a common understanding of the terminology and work processes for the reporting, follow up and learning from hazardous conditions
- Give examples of methods that can be used to identify hazards and potential accidents
- Create a common understanding that hazardous conditions must be systematically followed up, corrected and analysed such that learning can take place
- Help to create a standardised method for the reporting of hazardous conditions

Changes from the previous revision

References to other SfS recommendations are included and other references are updated. Other than that, there are only minor changes in the form of improved language and clarity.

Terminology and definitions

Risk

A usual definition involves looking at risk as a combination of possible consequences and associated probabilities. More generally, risk can be defined as a combination of possible consequences and associated uncertainty.

This recommendation uses the Petroleum Safety Authority’s definition: “The risk connected to an activity is defined as the combination of possible future incidents and their consequences, as well as associated uncertainty.”

HSE risk may include:

- The risk that a hazard and/or accident situation may occur
- The actual and possible consequences of the incident (potential loss inherent in the incident, threats to people, the environment and equipment, as well as vulnerabilities at the facility/within the organisation
- Uncertainty regarding whether unforeseen events may occur

Hazard and/or accident situations

The Petroleum Safety Authority uses “hazard and accident situations” as an umbrella term for both events that may lead to accidents and accidents that have actually occurred, as well as other undesirable situations or conditions that may result in damage/injuries. This is illustrated in the figure below.

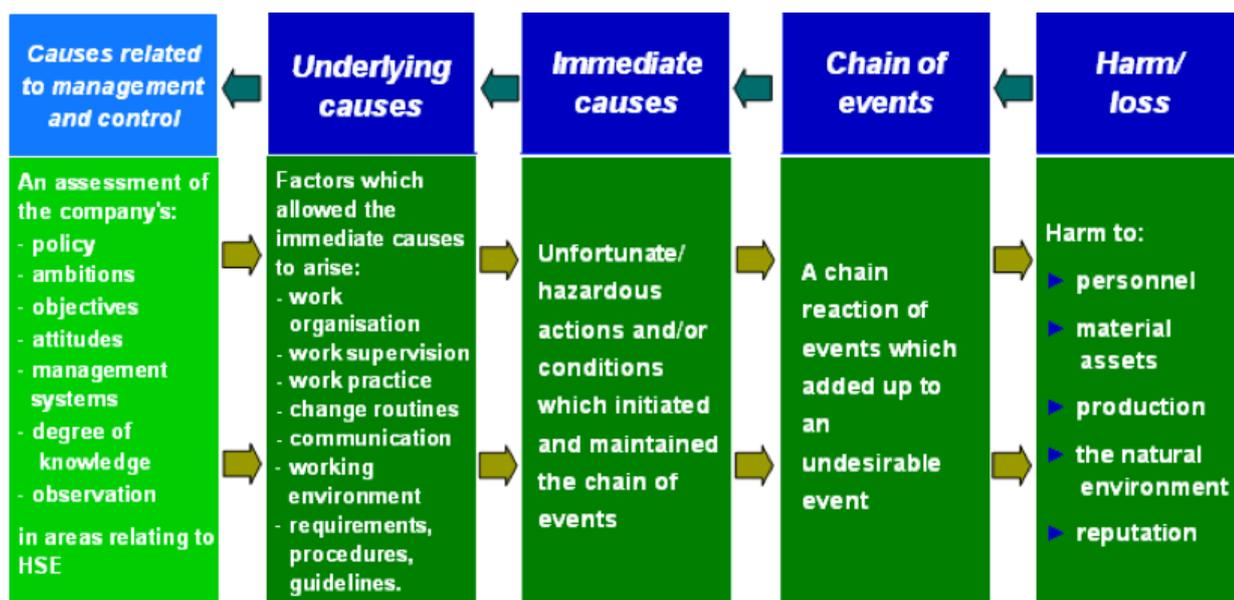


Figure 1. Loss causation model (Source: Working Together for Safety Recommendation 035E)

Hazardous conditions

In this context, “hazardous conditions” refers to the hazardous conditions/situations in which energy is not released, or other situations that have not yet triggered a chain of events in which there is a risk of damage/injury or loss.

Events leading up to accidents/near-accidents

These are hazard and accident situations that have not resulted in an actual accident, but which under slightly different circumstances may have resulted in damage/injury or loss.

Understanding risks and the identification of hazards

Systematic and targeted work should be undertaken in order to:

- Establish an understanding of how individuals may subject themselves and others to hazards through their actions and work patterns
- Establish a practice and culture that aims to implement observation practices, vigilance and openness in order to ensure that hazardous conditions are dealt with immediately and reported as soon as possible
- Create an HSE culture in which it is natural and expected that individuals intervene when they observe actions or conditions that may involve a risk of an incident occurring

This means that the individual must:

- Identify sources of danger – observe, perceive and recognise warning signs (latent defects and omissions) at an early stage
- Focus on what may happen and how probable this is – undertake an assessment of the risks associated with the observed conditions/situation
- Consider what can be done to prevent escalation “there and then” – act (intervene), report the conditions, and take these up with his/her superior, safety representative and/or others with roles relating to reporting
- Identify actions and further work – suggest measures, correct defects, ensure learning

What shall be reported?

In accordance with the Working Environment Act, employees have a duty to “actively participate in the execution of the measures that are implemented in order to create a good, safe working environment.” This includes taking ownership of observed defects and omissions, acting (intervening) wherever possible, and reporting defects and omissions.

Examples of what should be reported include:

- Defects and damage relating to instruments, equipment (including safety equipment), materials, systems, tools, etc.
- Risk of oil and gas leaks (e.g. in the event of corrosion or mechanical damage to HC bearing components and systems)
- Omissions and errors in procedures and guidelines
- Violations in the use of procedures/guidelines (such as “silent nonconformities”)
- Poor orderliness and cleanliness at the workplace that may constitute a safety risk
- Risk of falling objects
- Poor human/machine interface
- Other ergonomic conditions, such as objects that may constitute a risk relating to trips/falls, impact injuries/puncture wounds, etc.
- Incorrect execution of work / insufficient training
- Inadequate planning/management/communication

This involves taking the entire MTO perspective into account in the identification of latent risk (present but hidden defects and omissions).

It can be difficult for inexperienced/new employees to report hazardous conditions – it is therefore important to give everyone a good introduction. Everyone can contribute and it is important that observations from new employees are reported – they have “fresh eyes” and may identify hazardous conditions that more experienced individuals have become accustomed to and tolerate. The safety representative can assist in ensuring reporting in such cases.

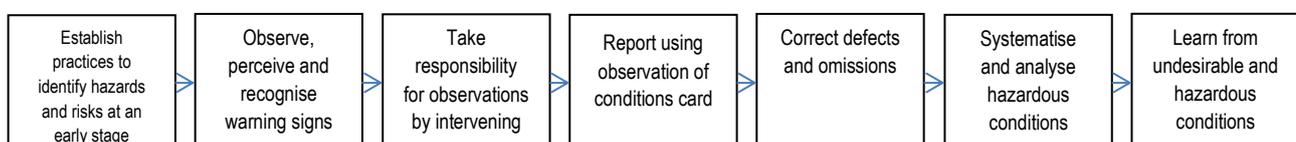
Ensure anonymity

If an observation card is used to report undesirable conduct at individual level, the anonymity for involved personnel must be secured. Hazardous conditions are reported in order to prevent recurrences and ensure learning. The objective is not to hand out “punishment” at an individual level.

Observation cards shall not be used to report matters involving sensitive personal information. Personnel matters shall be reported in accordance with the company’s dedicated routines, and followed up through the personnel systems in a way that protects the individual’s privacy and meets GDRP guidelines..

Process for the reporting of hazardous conditions

Figure 2: Work process, hazardous conditions



Various companies have developed different methods and activities in order to ensure that hazardous conditions are identified. In addition to the formal activities relating to work permits and safe job analyses (WP/SJA), it should be ensured that all employees receive sufficient training so that they are able to observe, identify and understand hazards, and identify relevant hazards in their current work on a daily basis.

A culture should be created in which all employees are enabled to take ownership of observations of undesirable conditions and intervene as long as this poses no danger to themselves or others, and which gives employees the opportunity to report hazardous conditions. This can be done using a report card. An example report card, "Observation of conditions," is provided in Appendix A.

The industry recognises that hazard and accident situations are often caused by a lack of attention. In this context, it is important to emphasise that individuals should move from being inattentive to more vigilant; one can check carefully instead of simply looking, listen instead of simply hearing, perceive instead of guessing, and stop and act instead of moving on. It is important that individuals recognise when they are faced with hazardous conditions.

The report cards must be easily accessible at the workplace, and the received cards will be included in the systems established by the individual operator/employer. Usually, the cards are submitted to the work manager, safety representative or HSE responsible at the installation/facility.

Recommendations regarding the handling of received observation cards

Elements that should be included:

- Reported conditions should be corrected at the lowest possible level
- Each individual organisation should have routines and systems that ensure that serious conditions are considered at a higher level
- Unless the person who made the report has made it clear that he/she does not desire feedback, it should be ensured that the person who reported the conditions has the opportunity to follow the next stages of the process
- The organisation should have routines that ensure information is provided about implemented and planned measures to improve safety based on received observation cards

Each individual card must be considered in relation to the company's requirements regarding whether the described conditions should be transferred to other systems for the handling of hazard and accident situations (e.g. Fontaine, IMPACT, Synergi, SAP, PIMS, etc.).

As a minimum, the transfer of the following conditions to other systems should be considered in order to ensure thorough follow-up:

- Conditions that require a more thorough evaluation/assessment in order to identify causes and measures
- Observations of conditions that are assessed as having universal value for learning across the organisation
- Conditions relating to omissions/weaknesses linked to equipment must be shared with the manufacturer.

Follow-up and learning

- A regular review of the registered conditions should be carried out in order to assess whether further measures are necessary
- The review/assessment may show that there is a need for further analysis of the registered conditions – in this case, an annual analysis should be carried out, ref. Working Together for Safety Recommendation 035E Statistics and analysis of HSE incidents and data
- Relevant recommendations and measures from the above-mentioned reviews and analyses should be included in the organisation's HSE programme / action plans.
- For more information on learning, please see SfS recommendation 043E "Learning after incidents"

References

- The Management Regulations
- The Technical and Operational Regulations
- The Working Environment Act
- The regulations regarding systematic health, safety and environment work within organisations (the Internal Control Regulations)
- Working Together for Safety Recommendation 029E Investigation and inquiry
- Working Together for Safety Recommendation 035E Statistics and analysis
- Working Together for Safety Recommendation 043E Learning from incidents
- The Ship Safety and Security Act
- Employment protection etc. for employees on board ships (the Ship Labour Act)

Appendix A: Report card – Observation of hazardous conditions

This is an example of a report card design, including a short guide. Organisations are welcome to use this card with their own logo.

Observation of conditions			Sf5 Samorbeid for Sikkerhet	
Date :	Time:	Name/Company(block capitals):		
Accurate location description (Platform / location /area / module, lowest level)				
Description of observed conditions				
In your opinion, what is the cause of the conditions?				
Measures			a. What action has been taken (if any)?	
			b. What would prevent the conditions from recurring?	
Name/e-mail of relevant manager:			Feedback desired?:	
			<input type="checkbox"/> Yes	
			<input type="checkbox"/> Not necessary	
----- Signature:				

Report card – Observation of hazardous conditions: Guidance for completion

- Quick and accurate reporting is necessary so that conditions can be located and improved
- Date/time – state when you observed the conditions. Be as accurate as possible
- Name/Company – enter your name and the company you work for
- Accurate location description – describe the location/equipment as accurately as possible in order to make locating the conditions as easy as possible for others (module no., TAG no., etc.)
- Description of observed conditions – provide a short and precise description. Remember that the recipient is not as familiar with the case as you are
- Cause – briefly and accurately describe your assessment/analysis
- Measures – state what you or others have done in order to correct the conditions. Suggest what may prevent similar conditions from occurring in the future.
- Name of relevant supervisor – provide the name and e-mail address of the person you report to on board / at the installation.

Report card – Observation of hazardous conditions: Guidance for recipient

- Ensure that the correct information has been provided
- Is the case description accurate and detailed enough? Will others understand the described conditions? If not, make the necessary corrections. If you are unsure, contact the person who made the report if possible
- Decide who is responsible for any reporting and ensure prompt processing
- Assess and distribute the report to other recipients, management, etc., if necessary
- If necessary, register the reported conditions in the company's system for the follow-up of undesirable incidents
- Provide feedback to the individual who reported the conditions
- Consider sharing the feedback with others so that they are familiar with the work being done to improve safety

Appendix B: Some methods

Various companies have developed a range of methods and tools/activities in order to ensure that hazardous conditions are identified. In addition to the formal activities relating to work permits and safe job analyses (WP/SJA), it should be ensured that all employees receive sufficient training so that they are able to understand and identify the hazards that are relevant to the work that shall be carried out and the relevant workplace.

There are three main methods that can be used to identify and manage hazardous conditions:

- 1) General overview: List the most serious hazards in an overview and describe how each of these shall be handled. List general hazards relating to access, work at height, operation, insulation, etc. and describe the measures that can be implemented.
- 2) Experience-based: Use the experience of the work team and previous incidents in order to identify hazards. Discuss hazards and implement measures before the work starts. This can be done formally and in writing (e.g. SJA four point check, etc.) or verbally (e.g. Pre-job discussion, “take two”, etc.). See also Appendix 1 to Norwegian Oil and Gas Recommended Guideline 088.
- 3) Competence-based: Here, training in how to identify hazards is provided. This might be training in various observation techniques, or how to identify hazards by looking at the energies that are present in the work area. When possible hazards are identified it must be ensured that barriers are in place between the hazard and vulnerable objects.