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## REQUIREMENTS

**Principle:** BP entities have a formal documented process to control construction, maintenance, demolition, remediation, operating tasks and similar work activities such that risks are identified, assessed and controlled in a methodical way so that work can be carried out safely.

### Minimum Requirements – Each BP entity shall:

- 3.1 **CoW Policy** (Intent: Ensure that a clear policy and associated procedures are in place which describe how control of work is delivered at a site level and to ensure that documents are issued within a document control management system.)
  - 3.1.1 Entities shall implement and maintain a written policy and associated procedures that describe the control of work process and detail how the requirements of this Group Defined Operating Practice are delivered.
    - a. The Control of Work Policy and associated procedures shall be issued and maintained in accordance with the entity's information management and document control process.
    - b. Changes to the CoW Policy and associated procedures shall be controlled using a management of change process.
- 3.2 **Accountabilities** (Intent: Ensure that the roles and responsibilities required to operate the CoW policy and associated procedures are identified, articulated to the designated persons and that those persons are competent, authorised and that auditable evidence is available. If a contractor is responsible for carrying out work covered by the CoW policy and associated procedures, fulfilment of various requirements of this section may be the responsibility of the contractor.)
  - 3.2.1 All identified roles within the CoW policy and associated procedures shall have defined accountabilities.
  - 3.2.2 The levels of authority for approval to proceed with work shall be commensurate with the level of risk.
    - a. Those who give final authorisation for any work shall be sufficiently trained and suitably aware to assess the hazards and risks. They shall have full knowledge of the work in progress within the area concerned.
    - b. The CoW policy and associated procedures shall include (i) a clear definition /description of each authority level including the required competence for each level, (ii) a formal process (e.g., risk matrix) that clearly defines and allows determination of individual risk levels, and (iii) an Authority-risk matrix (or similar tool) defining the appropriate authority level for the determined level of risk.
  - 3.2.3 Each person assigned a CoW role shall, upon request, be able to demonstrate that he or she understands and accepts the assigned role, accountabilities and responsibilities.
    - a. A list of the required roles, including their accountabilities and responsibilities, shall be clearly

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documented as part of the CoW policy and procedures.

b. Personnel assigned a CoW role shall be informed of their role(s) and responsibilities, and shall have ready and easy access to them in documented form.

3.2.4 There shall be a Single Point of Accountability (SPA) for management of the CoW process and its continuing successful delivery.

a. SPA authorities, accountabilities and responsibilities shall be clearly documented as part of the CoW policy and procedures.

b. The identity and contact details for the SPA shall be readily and easily accessible to personnel.

**3.3 Training and Competence** (Intent: Provide assurance that everyone involved with the CoW process has the required training and has reached the level of competence required to ensure correct application of the process. If a contractor is responsible for carrying out work covered by the CoW policy and associated procedures, fulfilment of various requirements of this section may be the responsibility of the contractor.)

3.3.1 Persons involved in the CoW process shall be trained and shall meet the competency requirements for their assigned CoW roles.

3.3.2 Roles shall have defined competency. Identity and contact details for the SPA shall be readily and easily accessible to personnel.

a. The defined competencies for each identified CoW role shall be documented as part of the CoW policy and procedures, and used to establish the competency and training requirements for persons assigned to carry out that role.

b. A documented program of review for defined competencies shall be in place to capture lessons learned and new practices.


3.3.3 Training, including refresher training, shall be available for the roles within the CoW process and linked to the defined competencies.

a. Based on established competencies, a documented training program (e.g., training matrix) shall be maintained and implemented. It shall identify (i) then personnel designated a CoW role and (ii) the training required for designated personnel in order to fulfil their roles (including initial training, refresher training, recertification and remedial training for those recognised as operating below acceptable standards)

3.3.4 Competence levels shall be checked at a defined frequency.

3.3.5 Training and competency records for CoW related roles shall be maintained and updated.

**3.4 Training and Competence** (Intent: Ensure that planning and scheduling of work delivers an

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integrated planning function which accurately reflects the work to be carried out, the use of resources and the time period required for the safe completion of work.)

3.4.1 Planning and scheduling of work shall identify individual tasks and their interaction.

3.4.2 Planning and scheduling shall consider time and resource requirements for hazard identification, risk assessment, preparation and planning.

a. A documented work planning process shall be in place that takes into account the time required for all stages of the control of work process. In particular hazard identification, risk assessment, scheduling and equipment preparation shall be integral to the work planning process.

b. This includes the identification of personnel and suitable equipment required for the safe execution of the task.

c. Where necessary the appropriate subject matter experts shall be included in the planning stages.

3.4.3 Simultaneous operations shall be identified and consideration given to their compatibility.

3.4.4 When work is dependent on or affects another activity their planning, scheduling and implementation shall be coordinated and priorities of execution defined.

a. The planning process shall identify dependent and linked activities, including those associated with planned maintenance.

b. Where necessary, activities shall be coordinated and prioritised so that they can be completed in a safe, efficient and timely manner.

**3.5 Task Based Risk Assessment** (Intent: Ensure that a risk assessment is conducted and is capable of coping with various levels of complexity, dependent upon the hazards, likelihood of those hazards being realised and the extent of the controls and mitigation needed to ensure that the work can be completed safely.)


3.5.1 Tasks shall not be conducted without being risk assessed.

3.5.2 At least one member or representative of the workforce performing the task shall participate in the risk assessment. The risk assessment findings shall be communicated in writing and signed off by all involved in the task.

a. Where more than one team is assigned to carry out the work, a representative from each team shall be included.

b. The results of the risk assessment shall be recorded and communicated in writing to personnel involved in the assessed task.

c. All personnel involved in carrying out the task shall sign off on the completed risk assessment

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findings to show that they have agreed and understood them.

3.5.3 The work site shall be inspected as a pre-requisite for conducting the risk assessment.

3.5.4 Routine tasks that are not controlled using a permit to work system shall be risk assessed and be covered by a procedure.

a. Tasks classified as routine shall be identified.

b. Routine procedures and associated risk assessments shall be formally recorded and controlled.

c. Procedures and associated risk assessments shall be subject to a program of regular review.

d. Persons carrying out activities controlled by procedures shall be trained, assessed as competent to carry out the task and authorised to do so.

3.5.5 Equipment used in performing work shall be assessed fit for purpose through inspection and/or review of any certification.

a. A system shall be in place to ensure that equipment identified as necessary for safe completion of the task (including contractor supplied equipment) is checked by an authorised person prior to work commencement to confirm it meets the defined specification for the task, is within date for testing and re-certification, and free from obvious defects/excessive wear.

3.5.6 To reduce risks, risk assessments shall consider these measures in the following order – Elimination > Substitution > Control > Mitigation:

a. Wherever possible, hazards shall be eliminated from the task.

b. If a hazard cannot be eliminated, consideration shall then be given to its substitution.


c. If the hazard cannot be eliminated or substituted, control measures shall be put in place.

d. Personal Protective Equipment (PPE) shall only be considered as the last protective barrier before a person is exposed to a hazard. Reliance on PPE shall only occur after all other efforts have been made to eliminate or reduce the hazard.

e. Mitigation measures (measures to reduce the effects of an accident or condition) shall be in place even when other controls have been put in place because residual risks will still remain.

f. A system shall be in place to ensure that PPE identified as necessary for safe completion of the task (including contractor supplied equipment) is checked by an authorised person at defined intervals to confirm it meets the defined specification for the task and is within date for testing and re-certification.

3.5.7 Proven emergency response plans, based on potential emergencies, shall be in place before

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commencing work.

a. The risk assessment shall identify the credible potential emergencies that could occur during the work.

b. Based on the risk assessment findings, emergency response plans shall be in place before work commences.

c. All personnel involved in the work shall be made fully aware of the control measures and emergency response plans that are in place and the actions required of them in an emergency.

3.5.8 Requirements detailed in Appendix of this GDP shall be applied when defining the controls for work activities involving energy isolation, ground disturbance, confined space entry, working at heights and lifting operations.

**3.6 Permit to Work** (Intent: Ensure that a formal process of "permitting" is utilised for the specific high risk work and to allow such work to be safely carried out using the appropriate level of control.)

3.6.1 Before conducting work that involves confined space entry, work on energy systems, ground disturbance, hot work or other hazardous activities, a permit shall be obtained.

3.6.2 Permit documentation shall:

a. Define the scope of work, location and its duration.

b. Identify hazards and reference risk assessments.

c. Identify isolation of energy sources required to carry out the job.

d. Define control measures to eliminate or mitigate risks.

e. Link the work to other associated work permits or simultaneous operations.


f. Record where there are isolations common to more permit, and prevent these isolations being removed before all permits have been signed off.

g. Specify those carrying out the work and verify that the risks and control and mitigation measures have been communicated to them.


h. Be authorised, monitored and re-validated by the person responsible for doing so.

i. Ensure adequate control over the return to normal operations.

3.6.3 Only work covered under the task description of the permit can be performed

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- 3.7 Authorisation and Communication** (Intent: Everyone involved in the work is acquainted with the identified hazards, likelihood of those hazards being realised and the controls and mitigation actions which have been applied in order to reduce the possibility of an incident or accident.)
- 3.7.1 The work site shall be inspected before permit issue by a person with the competencies required to identify the work scope and hazards and the controls and mitigation measures needed for the work. This inspection shall:
- a. Confirm that the control and mitigation measures recorded in the permit that need to be in place before start of work are in place and that conditions have not materially changed so as to necessitate different or additional control measures.
  - b. Identify any problems that may have previously been overlooked.
  - c. Identify any material changes to the site that will affect the findings of the original risk assessment.
- 3.7.2 The scope, hazards, controls and mitigation measures shall be communicated in writing and signed off by all involved in the task.
- 3.7.3 The person responsible for issuing the permit shall confirm that the person(s) accepting the permit fully understands its contents. They shall verify that the permit acceptor:
- a. Understand the scope and requirements of the work permit, adjacent activities/hazards and initial emergency actions.
  - b. Are shown the correct equipment addressed by the permit, which shall be clearly identified.
  - c. Are able to identify when changes in the work environment invalidate the original permit, and shall cease all activity until a re-assessment has been completed.
- 3.7.4 The person accepting the permit shall verify that all involved in the task sign to confirm understanding of the scope, hazards, controls and mitigation measures.
- a. It is not enough merely to tell a person something. There shall be effective communication to ensure full understanding of the information being conveyed, and there shall be a record that such communication has taken place.
  - b. Workforce members shall be made aware of the permit contents, especially the (i) scope of work, (ii) hazards that may be encountered, and (iii) the controls and mitigating actions that are in place to reduce these hazards and their effects.
  - c. Workforce members shall sign the permit to formally acknowledge that they understand its contents.
  - d. A copy of the permit shall be retained on site for the duration of the work for the benefit of the

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workforce,

3.7.5 Operations and other relevant personnel shall be informed of and understand the impact and status of work which may affect them, prior to the commencement of that work.

3.7.6 Personnel operating in remote locations may have limited access to facilities and other competent personnel. It is particularly important that they have the skills, competencies and CoW knowledge required to operate safely in the conditions they work in. Persons performing work at remote locations of site shall:

a. Be able to demonstrate their understanding of the CoW process to which they shall adhere and have the skills and competencies required to identify the work scope, hazards, controls and mitigation measures required by the work.

b. Be able to demonstrate that they have the skills and knowledge necessary to carry out the work, including the ability to safely carry out electrical and mechanical isolations where required.

c. Be provided with a system of communication, be competent in the use of that system and establish and maintain regular communication with a designated location.

c. Have access to the appropriate authority with whom they will validate the permit requirements and can confirm their understanding of the permit.

**3.8 Monitoring of Work Activity** (Intent: Competent persons visit and inspect the work site at defined intervals to verify that the conditions detailed on the permit have not been compromised, that only the work as described on the permit is carried out and the work is continuing in a safe manner.)

3.8.1 All ongoing work requiring a permit shall be managed and monitored at defined intervals by a responsible person.


3.8.2 Those issuing the permit shall provide monitoring of the work and maintain regular communication with those performing the work.

a. Monitoring shall verify that the conditions detailed on the permit have not been compromised and that the work continues in a safe manner. Monitoring shall also ensure that only the work described on the permit is carried out.

b. A responsible person shall be assigned to visit the work site at defined intervals in order to verify that the permit conditions are being complied with by the workforce and to assess whether the original permit still covers the work in progress.

c. The frequency and type of monitoring required shall be defined as part of the risk assessment process.

3.8.3 Before work re-commences after interruption, the site conditions and appropriate control

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measures shall be assessed.

a. If work is interrupted, the site conditions and appropriate control measures shall be re-assessed before work is allowed to re-commence. Interruptions include meal breaks, smoke breaks, alarms, emergency situations and shift changes.

b. Where conditions or control measures are seen to have changed, work shall not restart until the situation has been assessed and conditions returned to those required by the permit. If this cannot be achieved, a new permit shall be required.

3.8.4 At shift change, before work re-commences, hand-over arrangements between those involved in the work shall include the status of continuing work, a re-appraisal of site conditions and the appropriate control measures.

3.8.5 The responsible person charged with monitoring the ongoing work shall:

a. Identify when the site conditions have changed.

b. Assess when the original permit no longer accurately covers the task, stop the job if necessary and request a re-assessment.

c. Have the required competence to recognise when site conditions no longer comply with the permit requirements.

d. Investigate any indication from the workforce that the work may be unsafe.

3.8.6 The status of permits (including a register of associated inhibits/overrides/isolations) shall be accurate, up to date and available at a designated location.

a. A copy of all permits and associated certificates currently in force shall be held at a designated location (e.g., the control room, the site office, or electronically).

b. A person shall be assigned to monitor the status of all permits and to verify that associated registers for isolations, overrides and inhibits are maintained in an up-to-date condition.


**3.9 Work Completion and Close Out** (Intent: On completion or interruption of any work activity, prior to the work permit being closed, the work site is visited to ensure that no potential sources of accidents remain and that the equipment can be safely brought back into service without incident.)

3.9.1 The work site shall be inspected and confirmed as being in a safe condition on completion or interruption of work. This inspection shall verify that:

a. The area has been cleared of any tools, rags, debris, etc.

b. Fittings or equipment removed or dismantled during the work have been re-instated or left in a



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safe condition.

c. The area has been cleaned as required and any spills and contaminants removed and disposed of safely.

3.9.2 Upon completion of the work, the permit shall be closed by signature from the appropriate authority to verify that:

a. The work site has been assessed as clean, tidy and in a safe condition.

b. An authorised person has provided a sign off to confirm that the work is complete and the permit closed-out.

3.9.3 The CoW process shall include de-isolation, reinstatement and testing of the system's integrity.

**3.10 Auditing** (Intent: A program of regular auditing be established. The audits should review and make recommendations for improvements on the correct application of the CoW process, including all documentation, controls, training and competency.)

3.10.1 The CoW process shall be subject to a program of regular auditing.

a. Audit results shall be recorded, analysed and used to improve the management and quality of the CoW process.

b. The scope of any CoW audit shall include individual permits and any associated risk assessments. In addition, it shall cover the CoW documentation, processes and procedures as well as their correct use and application.

**3.11 Lessons Learned** (Intent: Ensure that any learnings on how to improve the CoW process and the safe means of carrying out work are made available to and used by all facilities across the BP Group.)


3.11.1 Internal and external lessons learned that impact the CoW process shall be captured, incorporated and shared.

**3.12 Stop Unsafe Work** (Intent: Stop the continuation of potentially unsafe work at the earliest stage possible by making every member of the workforce responsible for its prevention.)

3.12.1 The CoW policy and associated procedures shall make it clear to everyone that they have the obligation and authority to stop unsafe work.

a. Personnel shall be made aware of the actions they shall take, including reporting, when stopping unsafe work.


b. Instances of work being stopped for reasons of safety shall be recorded.

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c. Reports of unsafe work, from any member of the workforce, shall be investigated and the results recorded.

### QUESTIONS: CONFORMANCE TO REQUIREMENTS

1. **Has the entity implemented, and does it maintain, a written CoW policy and associated procedures? (Requirement 3.1.1)**
  - 1.1. Do these documents adequately describe the entity's control of work process?
  - 1.2. Do they detail how the requirements of the subject GDP are delivered?
  - 1.3. Are the entity's CoW policy and associated procedures issued and maintained in accordance with its information management and document control process? Do all CoW documents have a visible DCMS reference and version number on them? Is the entity's DCMS subject to regular audits and monitoring and are these carried out?
  - 1.4. Are changes to the CoW policy and associated procedures controlled following the entity's Management of Change (MOC) process? Any recent instances where this has not been the case? What were the specific circumstances?
2. **Has the entity defined and clearly documented as part of its CoW policy and associated procedures the responsibilities and accountabilities for all identified CoW roles? (Requirement 3.2.1)**
  - 2.1. What CoW roles are specifically identified?
  - 2.2. What are the specific responsibilities and accountabilities for each identified role?
3. **Are the levels of authority for approval to proceed with work commensurate with the level of risk involved? Do the CoW policy and procedures include: (Requirement 3.2.2)**
  - 3.1. Clear definitions/descriptions for each approval authority level, including the required competence?
  - 3.2. A formal process (e.g., risk matrix) that clearly defines and allows determination of individual task risk levels?
  - 3.3. An authority-risk matrix (or similar tool) defining the appropriate approval authority level for the determined level of risk?
  - 3.4. A requirement that those who give final authorisation for any work shall be sufficiently trained and suitably aware to assess the hazards and risks, also that they have full knowledge of the work in progress within the area concerned?
4. **Can each individual assigned a CoW role demonstrate that he/she understands and accepts the role assigned and its attendant responsibilities and accountabilities? (Requirement 3.2.3)**
  - 4.1. Have they been made aware of their specific CoW roles, responsibilities and accountabilities? How?
  - 4.2. Do they have ready and easy access to them in documented form? How? Where?

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5. **Has the entity designated a Single Point of Accountability (SPA) for management of the CoW process and its continuing successful delivery? (Requirement 3.2.4)**
  - 5.1. Who is the designated CoW SPA? Is this individual sufficiently high in the entity's organization, or otherwise have the necessary support of management, to ensure that the requirements of the CoW process are followed?
  - 5.2. Are the specific authorities, responsibilities and accountabilities of the SPA clearly documented as part of the CoW process and associated procedures?
  - 5.3. Are the identity of, and contact details for, the CoW SPA readily and easily available to the workforce? How?
6. **Has the entity defined required competencies for each identified CoW role? (Requirement 3.3.2)**
  - 6.1. Are the required competencies documented as part of the CoW policy and associated procedures?
  - 6.2. Are these required competencies used to establish the competency and training requirements for individuals assigned to carry out the identified CoW roles?
  - 6.3. Is there a documented program in place for review of required CoW competencies to capture lessons learned and new practices? Has the entity conducted such reviews?
7. **Has the entity implemented, and does it maintain, a documented training program linked to the defined CoW competencies? (Requirements 3.3.1, 3.3.3-3.3.5)**
  - 7.1. Is the CoW training program (e.g., training matrix) documented?
  - 7.2. Does the program identify the individuals having designated CoW roles? Who are they?
  - 7.3. Does the program require these individuals to be trained and to meet the required competencies for their assigned CoW roles?
  - 7.4. Does the program identify the training required for these designated individuals in order to fulfill their CoW roles, including initial training, refresher training and re-certification as well as remedial training for those recognized as performing below acceptable standards?
  - 7.5. Have these designated individuals received the CoW training they require?
  - 7.6. Does the entity check these individuals' CoW competence levels at a defined frequency? How frequently? Who does it? How?
  - 7.7. Does the entity maintain and update CoW training and competency records for these individuals?
8. **Does entity planning and scheduling of work identify individual tasks and their interaction? (Requirement 3.4.1)**
  - 10.1. How is work planned and scheduled? Using what system or following what process? Is that work planning process/system documented?
  - 10.2. Does that system or process identify interactions among individual tasks? How?

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**11. Does entity planning and scheduling of work take into account the time and resources required for all stages of the Cow process? (Requirement 3.4.2)**

- 11.1. Does it allow adequate time for task-related hazard identification? Risk assessment? Equipment scheduling and preparation?
- 11.2. Does it include identification of the personnel and suitable equipment required for safe task execution?
- 11.3. Does it allow, where necessary, for including appropriate subject matter experts in the work planning stages?

**12. Does entity planning and scheduling of work identify simultaneous operations and give consideration to their compatibility? (Requirement 3.4.3)**

- 12.1. How is this done? Who does it? Who else gets involved?
- 12.2. Any formal criteria for determining potential incompatibilities? What are they?

**13. Does the entity coordinate planning, scheduling and implementation of work when tasks are dependent on or affect other activities? (Requirement 3.4.4)**

- 13.1. How are dependent and/or linked activities identified? Do these include Activities associated with planned maintenance? Who does this? Who else gets involved?
- 13.2. Are dependent/linked activities coordinated and prioritized so they can be completed in a safe, efficient and timely manner? Are execution priorities defined? Who does this? Who else gets involved?

**14. Does the entity conduct tasks without having performed a risk assessment? (Requirement 3.5.1)**


- 14.1. For tasks controlled using a permit to work?
- 14.2. For routine tasks not controlled using a permit to work?

**15. For tasks controlled using a permit to work, does the entity: (Requirements 3.5.2-3.5.3)**

- 16.1. Inspect the work site as a prerequisite for conducting the risk assessment?
- 16.2. Involve at least one member or representative of the workforce performing the task in the risk assessment?
- 16.3. Where more than one team is assigned to carry out the work, involve a representative from each team in the risk assessment?
- 16.4. Record and communicate in writing the results of the risk assessment to the individuals performing the task?
- 16.5. Require that all individuals involved in performing the task sign-off on the completed risk assessment findings to show they understand them and have agreed?

**15. For routine tasks not controlled using a permit to work, does the entity: (Requirement 3.5.4)**

- 15.1. Identify tasks classified as routine?
- 15.2. Cover routine tasks by procedures?

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- 15.3. Formally record and control routine procedures and associated risk assessments? Subject them to a program of regular review?
- 15.4. Train individuals assessed as competent and authorize them to carry out these routine tasks?

**17. Does the entity, through inspection and/or certification review, assess equipment used in performing work as fit for purpose? (Requirement 3.5.5)**


- 17.1. Is a system in place to ensure that equipment identified as necessary for safe completion of the task is checked by an authorised individual prior to work commencement? Does this also include contractor supplied equipment?
- 17.2. Does the individual performing the check confirm that the equipment meets the defined specification for the task? Is within date for testing and re-certification? Is free from obvious defects and excessive wear?

**18. Do entity risk assessments follow a preferred hierarchy of risk management options, namely elimination first, then substitution, control and mitigation in that order? (Requirement 3.5.6)**


- 18.1. Does the entity eliminate hazards from the task wherever possible? Examples of where this has been done?
- 18.2. If a hazard cannot be eliminated, does the entity then give consideration next to its substitution? Examples of where this has been done?
- 18.3. If the hazard cannot be eliminated or substituted, does the entity then put control measures in place? Examples of where this has been done?
- 18.4. When there still are residual risks present, does the entity also put mitigation measures in place to reduce the effects of an accident or condition? Examples of where this has been done?
- 18.5. Does the entity consider personal protective equipment (PPE) as a risk management option only after all other efforts have been made to eliminate or reduce the hazard? Examples of where PPE is used this in this way?
- 18.6. Has the entity put a system in place to ensure that PPE identified as necessary for safe completion of the task is checked by an authorised individual at defined intervals? Does this also include contractor supplied PPE? How frequently are these checks performed?
- 18.7. Does the individual performing the check confirm that the PPE meets the defined specification for the task? Is within date for testing and re-certification?

**19. Does the entity have proven emergency response plans in place before commencing work? (Requirement 3.5.7)**

- 19.1. Are these response plans based on a risk assessment that identified credible potential emergencies that could occur during the work?
- 19.2. Are the personnel involved in the work made fully aware of the control measures and emergency response plans that are in place and of the actions required of them in the event of an emergency?

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- 20. Does the entity apply the specific requirements called for in Appendix 1 of the subject GDP when defining controls for work activities involving energy isolation, ground disturbance, confined space entry, working at heights and lifting operations? (Requirement 3.5.8)**
- 21. Does the entity require that a permit be obtained before conducting work that involves confined space entry, ground disturbance, hot work or other hazardous activities? (Requirements 3.6.1-3.6.3)**
- 21.1. For which hazardous work activities does the entity require a permit?
- 21.2. Does entity permit documentation:
- Define the scope of work, location and duration?
  - Identify hazards and reference risk assessments?
  - Identify isolation of energy sources required to carry out the job?
  - Define control measures to eliminate or mitigate risks
  - Link the work to other associated work permits or simultaneous operations?
  - Record where there are isolations common to more than one permit, and prevent these isolations being removed before all permits have been signed off?
  - Specify those carrying out the work and verify that the risks and control and mitigation measures have been communicated to them?
  - Require authorization, monitoring and re-validation by the person responsible for doing so?
  - Ensure adequate control over the return to normal operations?
- 21.3. Is the permitted work that can be performed restricted to that covered under the task description of the particular permit?
- 22. Does the entity inspect proposed permit work sites before issuing the permit? (Requirement 3.7.1)**
- 22.1. Is the inspector an individual with the competencies required to identify the work scope, hazards and controls and mitigation measures needed for the work?
- 22.2. Do the inspections serve to:
- Confirm that the control and mitigation measures recorded in the permit as necessary before start of work are in fact in place, and that conditions have not materially changed so as to necessitate different or additional control measures?
  - Identify any problems that may previously have been overlooked?
  - Identify any material changes to the site that would affect the findings of the original risk assessment?
- 22.3. Do material changes to the site, or the existence of hazards overlooked by the original risk assessment, require the entity to review the existing risk and/or perform a new risk assessment?

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**23. Does the entity communicate in writing the scope, hazards, controls and mitigation measures to all involved in the permit task and gain their signoff? (Requirement 3.7.2)**

- 23.1. How is this done? Who does it?  
23.2. Does each individual involved sign off?

**24. Does the person responsible for issuing the permit confirm that the individual(s) accepting the permit fully understands its contents? Specifically, does this person verify that the permit acceptor: (Requirement 3.7.3)**


- 24.1. Understands the scope and requirements of the work permit, also adjacent activities/hazards and initial emergency actions required?  
24.2. Has been shown the correct equipment addressed by the permit and clearly identified as such?  
24.3. Is able to identify when changes in the work environment invalidate the original permit and knows to cease all activity until a re-assessment has been completed?  
24.4. How does the permit issuer verify these things?

**25. Does the person accepting the permit verify that all individuals involved in the task have signed off, thus indicating their confirmation that they understand the scope, hazards, controls and mitigation measures? (Requirement 3.7.4)**

- 25.1. How does the permit acceptor ensure full understanding by the involved individuals of the permit information being conveyed? What does he/she do to accomplish this?  
25.2. Does the entity maintain records that such communication has taken place? Who keeps the records? Where?  
25.3. Does the permit acceptor specifically communicate to those individuals involved in the task the:  
  - Scope of work?
  - Hazards that may be encountered?
  - Controls and mitigating actions that are in place to reduce these hazards and their effects?
25.4. Do the workforce members involved in the task sign the permit to formally acknowledge that they understand its contents?  
25.5. Does the entity, for the benefit of the workforce members involved, retain a copy of the permit on site for the duration of the work?

**26. Does the entity, prior to commencement of permitted work, inform operations and other relevant personnel of the impact and status of such work that may affect them? (Requirement 3.7.5)**

- 26.1 How does it do this  
26.2 Who is responsible for doing so?

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**27. Are individuals who perform permitted work at remote locations:  
(Requirement 3.7.6)**

- 27.1. Able to demonstrate their understanding of the CoW process?
- 27.2. Adequately skilled and competent to identify the work scope, hazards, controls and mitigation measures required by the work?
- 27.3. Able to demonstrate that they have the skills and knowledge necessary to carry out the work, including the ability to safely carry out electrical and mechanical isolations where required? How do they do this?
- 27.4. Provided with a system communication, competent in the use of that system and able to maintain regular communication with a designated location? What communications system is typically used?
- 27.5. Able to access the appropriate authority to validate permit requirements and confirm their understanding of the permit? Who do they typically have access to?

**28. Does the permit issuer designate a responsible individual to manage and monitor the ongoing permitted work at defined intervals? Does this responsible individual: (Requirements 3.8.1-3.8.2)**

- 28.1. Maintain regular communication with those performing the work? How?
- 28.2. Visit the worksite to verify that:
  - The conditions detailed on the permit have not been compromised?
  - Permit conditions are being complied with by the workforce and that the work continues in a safer manner?
  - Only the work described on the permit is carried out and that the original permit still covers the work in progress?
- 28.3. Conduct the type and frequency of monitoring defined as part of the original risk assessment process?


**29. Before work re-commences after an interruption, e.g., meal breaks, smoke breaks, alarms, emergency situations and shift changes: (Requirement 3.8.3)**

- 29.1. Are site conditions and appropriate control measures re-assessed before work is allowed to re-commence? Who does this?
- 29.2. Where site conditions or control measures are seen to have changed, is work re-start delayed until the situation is assessed and conditions returned to those required by the permit? If this cannot be achieved, is a new permit required?


**30. At shift change, before work re-commences, do hand-over arrangements Include: (Requirement 3.8.4)**

- 30.1. The status of the continuing work?
- 30.2. A re-appraisal of site conditions and the appropriate control measures?
- 30.3. Who is responsible for ensuring that this happens?



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- 31. Does the responsible individual charged with monitoring the ongoing work: (Requirement 3.8.5)**
- 31.1. Have the competence to recognise when the site conditions have changed and/or no longer comply with the permit requirements??
  - 31.2. Assess when the original permit no longer accurately covers task, stop the job if necessary and request a reassessment?
  - 31.3. Investigate any indications from the workforce that the work may be unsafe?
- 32. Is the status of permits kept accurate, up to date and available? (Requirement 3.8.6)**
- 32.1. Is a copy of all permits and registers of associated certificates (inhibits, overrides, isolations) held at a designated location (e.g., control room, site office, electronically)?
  - 32.2. Is an individual assigned to monitor the status of all permits and verify that associated registers are maintained in an up-to-date condition? Who is it?
- 33. Is the worksite inspected and confirmed as being in a safe condition on completion or interruption of work? Does the inspection verify: (Requirement 3.9.1)**
- 33.1. The area has been cleared of any tools, rags, debris, etc.?
  - 33.2. Fittings and equipment removed or dismantled during the work have been re-instated or left in a safe condition?
  - 33.3. The area has been cleaned as required and any spills and contaminants have been removed and disposed of safely?
  - 33.4. Who typically does these inspections?
- 34. Upon completion of the work, is the permit closed by signature from the appropriate authority to verify that: (Requirement 3.9.2)**
- 34.1. The worksite has been assessed as clean, tidy and in a safe condition?
  - 34.2. An authorised individual has signed off to confirm that the work is complete and the permit closed-out? Who typically is this authorised individual?
- 35. Does the entity's CoW process also include de-isolation, reinstatement and testing of the system's integrity? (Requirement 3.9.3)**
- 35.1. How is this handled?
  - 35.2. Who typically is responsible for doing it?
- 36. Does the entity audit the application of its CoW process on a regular basis? (Requirement 3.10.1)**
- 36.1. How is the auditing done? As part of the entity's internal self-assessment programme? Through other means? By whom? How frequently? When was the last such audit performed?
  - 36.2. Does the scope of the audit:
    - Include individual permits and associated risk assessments?

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- Cover the CoW documentation processes and procedures as well as their correct use and application?
- 36.3. Are audit results recorded? Analysed? Used to improve the management and quality of the CoW process?

**37. Does the entity, as part of its organizational learning process, capture, incorporate and share lessons learned that impact the CoW process? (Requirement 3.11.1)**

- 37.1. Internal from within the entity? Any recent examples? Shared within BP Group?
- 37.2. From within the BP Group? Any recent examples?

**38. Do the entity's CoW policy and associated procedures make it clear to the workforce that they have the obligation and authority to stop unsafe work? (Requirement 3.12.1)**

- 38.1. Is the workforce made aware of the steps to be taken, including reporting, when stopping unsafe work? How is this done? By whom?
- 38.2. Are instances of work being stopped for reasons of safety recorded? How is this done? By whom?
- 38.3. Are reports of unsafe work, from any member of the workforce, investigated and the results recorded? How is this done? By whom?

## QUESTIONS: PROGRAMME ASSESSMENT

### Assessment of Components

**1. Processes and procedures (OMS 4.1)**


- 1.1. Is the CoW process defined and documented?
- 1.2. Has it been communicated to relevant stakeholders and do they understand it?
- 1.3. Has it been implemented throughout the business?
- 1.4. Does CoW process documentation reflect current implementation practice?

**2. Clarity of responsibilities and accountabilities; defined competencies (OMS 2.2)**

- 2.1. Have roles, responsibilities, accountabilities and required competencies for implementing the CoW process been established, assigned and clearly documented?
- 2.2. Do the designated individuals understand their CoW implementation responsibilities/accountabilities?
- 2.3. Do processes exist to ensure that these individuals possess the competencies required to carry out their CoW responsibilities/accountabilities?

**3. Self-assurance program (OMS 8.2)**


- 3.1. Does the entity monitor ongoing CoW implementation through use of KPIs?
- 3.2. Does the entity conduct self-audits of its conformance with the CoW process?
- 3.3. Does the entity implement corrective actions for identified nonconformances and

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track them to timely closure?

#### Assessment of Overall Implementation Effectiveness

1. **Interview a sample of entity personnel having designated CoW roles to confirm their role understanding and competence.** (Number selected based on sampling and testing strategy in Audit Plan)
  - Do they understand and can they generally articulate their assigned CoW roles and attendant responsibilities and accountabilities?
  - Do they have the required competencies, and have they received the required training, for their particular CoW roles?
  - Do they know of any recent work done without a CoW permit that should have been done under a CoW permit? What were the specific circumstances?
2. **Review a sample of the entity's recent CoW permits and related documentation to selectively confirm compliance with its CoW policy and associated procedures. Interview worker involved as needed.** (Number of permits selected based on sampling and testing strategy in Audit Plan)
  - Risk assessment done?
  - Identification/coordination with simultaneous operations, dependent activities?
  - Appropriate equipment used?
  - Permit documentation complete (scope, hazards, isolations, control measures)?
  - Pre-work worksite inspection done?
  - Permit communication to, and signoff from, individuals doing the work?
  - Permit communication to operations and other relevant personnel?
  - Required permit authorisation obtained?
  - Work not started until authorised permit obtained?
  - Required monitoring of work done?
  - Worksite inspected and confirmed in safe condition on completion of the work?
  - Permit close-out signature obtained?
3. **Review incident reports for all incidents reported in the past year that occurred in the course of CoW permitted work.**
  - What were the specific circumstances in each case?
  - What were the critical factors identified? Were any of these CoW compliance-related?
  - What corrective actions were recommended? Approved and implemented?
  - Any evidence of CoW compliance-related repeat findings/critical factors?
  - Any identification of lessons learned? Shared within the entity? Within BP Group?
4. **Interview a sample of entity workforce members to confirm their understanding of their obligation to stop unsafe work.** (Ask a variety of entity employee and

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contractor personnel, the number selected based on sampling and testing strategy in Audit Plan)

### **GUIDANCE FOR DEVELOPING AUDIT PLANS FOR THIS SUB-ELEMENT**

#### **Physical Observations To Consider for the Audit Plan**


1. Whenever possible at an entity site, accompany and observe those individuals assigned to carry out CoW-permitted work tasks that may be scheduled during the period of the audit. Visually confirm CoW-related compliance regarding:
  - Approved permit authorizing the work prior to commencement of the work?
  - Workers involved understand and accept the contents of the permit and sign off on it?
  - Equipment to be used is fit for purpose?
  - Work is carried out in conformance with the authorised permit scope?
  - Work is appropriately monitored?
  - Worksite is inspected and confirmed as being in a safe condition after any work interruption? Upon work completion?
  - Any needed de-isolation, reinstatement and testing of system integrity is performed?
  - Permit is signed off as completed?

#### **Document / Record Checks to Consider for the Audit Plan**

1. Review entity / facility documentation of the CoW process, i.e., CoW policy and associated procedures
2. Review entity register of CoW permits and associated certificates?
3. Review a sample of recent CoW permits and related documentation (see Assessment of Overall Implementation Effectiveness, Question 2 above)
4. Review incident reports for all incidents reported in the past year that occurred in the course of CoW-permitted work? (see Assessment of Overall Implementation Effectiveness, Question 3 above)
5. Review documented training program linked to defined CoW competencies and related training records for individuals having designated CoW roles?

#### **Pre-Read to Consider for the Audit Plan**

- 1.
- 2.
- 3.

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## REFERENCES

### Links to Requirements, Recommended Practices and Other Resources

#### Group Essentials

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#### Group Defined Practices

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#### Group Recommended Practices

- 
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#### Other Resources

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