3.0 Health, Safety & Environment

The Unit Manager is responsible for ensuring that all crew are instructed in safe methods of work and for ensuring the maintenance of a safe, healthy, and hygienic working environment as detailed in the following procedures and in accordance with the company Occupational Health & Safety Policy and the Environmental Policy. Master copies of the policies are contained in the appendix to this section.

Training shall be carried out as detailed in Section 4 of this manual and communication of Health & Safety Policy and Procedures shall be as described in Procedure 3.4.

Trip routine procedures and forms are described in Section 2. The Unit Manager shall ensure the completion of these routine and non-routine procedures as listed below and described in the relevant procedure.

3.1 Company Health, Safety & Environmental Organisation

Health, Safety and Environment are Line Management responsibilities and consequently form an integral part of the duties of all levels of management.

The Operations Safety Communication Organisation is shown at Procedure 3.2.

The HSEQ Manager - Energy is responsible for the maintenance, monitoring and revision of ESS HSEQ policies and procedures.

The Business Director - Energy establishes the policy for offshore operations to address the requirements of the sector and conform to the Compass Group policy. He is responsible for the implementation of the policies and procedures within ESS and reports directly to the Managing Director - DORGS.

The Managing Director - DORGS is responsible for implementation of the Compass Policy within the sector and reports to the Managing Director - Compass Group, UK & Ireland.

The Group Managing Director has ultimate responsibility for Health, Safety and Environment within the Group and is responsible for establishing the policies.

The Compass policies are posted up at each location for information. The ESS Occupational Health & Safety Policy and the Environmental Policy form part of the induction procedure for all new personnel.

A comprehensive training file is held by each Unit Manager.

3.2 Organisation Chart



Labour within their contracts.

HSEQ Manager

Organisation Chart – HSEQ Communications

Operations Manager

3.3 Legal Requirements

The HSEQ Manager is responsible for identifying the legal and other occupational health and safety, hygiene, and environmental requirements applicable to the Company's operations.

Unit requirements shall be described within the relevant procedures in this manual.

A list of applicable legislation shall be maintained up to date and supplied to units for display on the notice board.

Unit Managers are responsible for ensuring that the latest edition of 'Applicable HSE Legislation' is posted on the notice board and brought to the attention of all employees.

3.4 Communication of HSE Policy and Procedures

The Occupational Health & Safety Policy and Environmental Policy are drawn to the attention of all staff at Induction Training and posted up for information.

A summary description of ESS Energy Safety Management System shall be explained to all employees and made available for reference.

If any policy or working practice is revised, Unit Managers shall receive the training necessary to effect the change.

All employees shall receive 'Core Training' within the first three months of employment. See Training section of this manual.

HSE Meetings shall be held each trip in accordance with procedure 3.14.

Occupational HSE Themes are provided for presentation at HSE Meetings by the Unit Manager or his/her nominee. See Procedure 3.15.

Toolbox Talk Form (SCIS) shall be conducted as appropriate to ensure safe working methods prior to identified tasks. See Procedure 3.16.

Safe Work Procedures shall be implemented at local unit level to manage associated work scope risks.

Job Training shall ensure that all members of the crew are able to complete their duties in a competent, safe, and hygienic manner.

Reference should be made to the relevant procedures in this section

3.5 Health, Safety, Environmental & Quality Objectives & Plans

The Health, Safety, Environmental and Quality Objectives of the company shall be clearly communicated to all relevant levels of management and staff.

The annual programme shall describe ESS objectives in a way that encourages the participation of managers, staff, and onshore personnel.

ESS aims to build on the positive components of previous strategies and to address the items identified in safety review. An annual Activities Plan is prepared to address specific themes / activities aimed at ensuring a safe workplace.

All employees are asked to commit to the individual objectives specified in the programme and identify additional team-based objectives to support the unit’s safety commitment for the year. All employees are issued with a 'credit-card' size safety objectives and commitment card.

Unit Managers are required to complete HSE Activity feedback forms issued by the HSEQ Department on a quarterly basis.

The HSEQ Manager collates the safety performance and achievements on an on-going basis.

The Health, Safety, Environmental & Quality Objectives, and uptake of activities are reviewed at the quarterly HSEQ Management Review Meetings.

Following the final review meeting of the year, anticipated organisational, legislative and operator changes are also considered in developing the programme for the following year.

Unit Managers shall ensure that a current copy of the Health, Safety, Environmental and Quality Objectives and HSE Activities Plan are displayed on their installation and explained to their crew.

All crew are required to participate in the activities as appropriate.

3.6 Cleaning

The efficiency of services, organisation, as well as high standards of hygiene depend on regular and planned cleaning of all areas.

The Unit Manager is responsible for ensuring that standards of presentation described in the Offshore Operating Manual and the safe work procedures are maintained.

Cleaning schedules should be designed to suit the layout of the installation, the style of operation, the manpower and equipment available.

The schedule should clearly show:

* what is to be cleaned
* who is responsible for checking?
* when it is to be cleaned
* the materials and equipment to be used will be on the SWP
* the precautions to be taken including protective clothing
* Cleaning equipment shall be used and maintained in a safe manner, as described in Procedure 3.7.

Cleaning utensils shall be maintained in good condition. The Unit Manager shall establish routines to ensure that cloths, dusters etc. do not cause potential cross contamination and that they are sterilised frequently and laundered as required.

Mops, deck scrubbers and mop pails shall be thoroughly cleaned after each use and then left to dry. Procedure 5.16 describes safety precautions to be taken in deep cleaning.

SAFE USE OF CLEANING MATERIALS

Cleaning materials shall be used only for the tasks intended, adhering to recommended methods and dilution rates.

The Unit Manager shall ensure that current COSHH Assessments are available for each task (see Procedure 3.10) and that the Manufacturers Safety Data Sheets are also made available, the most up to date sheets can be found online.

Manufacturers Safety Data Sheets should be reviewed annually or following a change of procedure or accident etc.

All employees shall be trained in the use of hazardous materials prior to their use, as described in Core Training, Procedure 4.4.

CLEANING MATERIALS AND THE ENVIRONMENT

Cleaning materials are selected, as far as practicable, to minimise the impact on the environment. The Unit Manager must ensure that the materials are used in the correct dilution and that spillages are dealt with as described in data sheets and/or COSHH assessments and noted on the Unit Spill Response Plan.

3.7 Equipment & Premises Safety

The objective of this procedure is to ensure that all work equipment used in our operations is suitable for the purpose for which it is used or provided; that the conditions under which equipment is used and the working environment have due regard for the health and safety of the user and others; and that equipment is used only for operations for which, and under conditions for which, it is suitable.

The Provision and Use of Work Equipment Regulations 1998:

Defines "use" as any activity involving work equipment. This includes the use, cleaning, and maintenance of the equipment etc.

Defines "work equipment" as any machinery, appliance, apparatus, or tool. This includes large and small items of equipment, e.g., cooking ranges, slicer, knives, ladder, trolley, etc.

The Unit Manager shall be responsible for the implementation of the Equipment SWPs procedure.

GENERAL SAFE USE

The Unit Manager shall ensure that the procedures affecting the safe operation are fully implemented:

Work Equipment shall only be used for its intended purpose.

The siting and use of equipment shall be such as to avoid endangering the user or any other person present in the unit.

No person shall operate or clean any piece of equipment until they have been fully trained, demonstrated their competence and can cope with breakdown or emergency.

Warning notices and equipment instructions shall be appropriately sited and drawn to the attention of employees.

Equipment shall be operated and cleaned in all instances in the manner described in the relevant service section of this manual.

Unsafe or damaged equipment shall be taken out of use and its inadvertent use prevented by electrical isolation, clear signage or secure storage until repair or disposal.

Unsafe working conditions shall be cordoned off to prevent access and clear warning signs posted.

All equipment or premises faults shall be reported to the Unit Manager who shall be responsible for ensuring that the Equipment Malfunction Summary is maintained - see Section 2.

Faults identified to the premises and client owned equipment shall be reported to the Client/ Owner's Offshore Representative on an Equipment Malfunction/Hazard Report (or client form).

NB It may be appropriate to use the 'Other Remarks' section to highlight potential hygiene or safety risks presented by the malfunction or premises condition.

All faults must be recorded on the Equipment Malfunction Summary, regardless of whether the ESS or a client malfunction report is used

3.8 Container Safety

The objective of this procedure is to ensure the safe unloading and loading of containers. The Unit Manager shall be responsible for ensuring that this procedure is adhered to and that all personnel involved in loading or unloading containers have been instructed in safe work practices and have been trained and assessed competent in manual handling. This training will have been recorded; pre-job safety briefing / Toolbox Talk Form (SCIS)s shall be carried out before the task begins.

RECEIVING CONTAINERS

* Never stand under containers when they are being hoisted on or off the platform/vessel. *STAND WELL CLEAR.* Never attempt to assist the deck crew in landing or moving them into position. Keep off the lay down deck when containers are being moved.
* Be alert to weather conditions before starting the task and monitor any changes in conditions during the task, e.g., wind, ice, swell etc.
* Hard hat, gloves, safety boots or shoes (and coveralls if required) and safety glasses should be worn when off-loading containers.

OPENING CONTAINERS

* Caution is needed when opening and closing container doors as the doors of containers are very heavy and stiff and could lead to fingers and hands being trapped.
* Open container doors with care in case the contents have moved and become unstable in transit. Stand clear of the door when opening in case items fall out.
* Check that the safety net is in place and in good condition. Do not overstretch to release the container net fixings.
* Containers shall not be loaded to unreasonable height and personnel should be aware of the step or change in height inside and out.
* If, on opening a container, loading/packing is found to be unsatisfactory the supplier shall be advised, and the incident reported on a Non-Conformance Report/Credit Request form.

UNLOADING CONTAINERS

* Check the route is clear before starting. Ensure any doorways and passages that must be negotiated are free from obstruction.
* Avoid manual handling where possible: make best use of conveyors, trolleys and barrows provided. Stack goods carefully and don't overload.
* Unload cages systematically: 1 -front upper level. 2 -lift shelf and secure. 3 -front floor level. 4-back upper level. 5-lift back shelf and secure. 6-back floor level. 7-lower shelf and secure.
* Keep your back as straight as possible for any lifting, avoid twisting and use your thighs as the means of leverage and ask for help with awkward or heavy packages. If in doubt don't lift.
* Never impair your vision when carrying goods. A clear line of sight is essential.
* Always clean up spillages as soon as possible.
* Ensure correct storage of foodstuffs. (See Procedure 7.6).

LOADING CONTAINERS

* If items are to be returned to shore by container, they shall be securely packed, secured, and protected as required to prevent harm to them in transit or to the onshore personnel who open and unload the container.
* Follow the procedure for returning items to shore as detailed in Procedure 8.7. The objective of this procedure is to ensure that the risks associated with the use of substances hazardous to health are reduced to as low as reasonably practicable.

The Unit Manager shall be responsible for implementing the procedure detailed below, in respect of his/her unit, in accordance with the Control of Substances Hazardous to Health Regulations 2002 and COSHH (Amendment) Regulations 2004

3.9 Control of Substances Hazardous to Health (COSHH)

In our operations, COSHH applies mainly to cleaning materials. Suppliers/manufacturers have a legal obligation to provide safety (hazard) data sheets. In addition, any substance marked VERY TOXIC, TOXIC, POISONOUS, HARMFUL, IRRITANT, automatically comes under the jurisdiction of COSHH. COSHH also applies to large quantities of dust or fibre.

All the ESS COSHH material, safety data sheets, COSHH Assessments, Task Cards and training collateral is available to download from the HSE Website under Health & Safety/COSHH.

DETAILED PROCEDURE

|  |  |  |
| --- | --- | --- |
| 1.Take Stock: | - | List all the substances used in your area of responsibility. A master Register of Chemicals form is contained in the Appendix to this section. Only chemicals on the core cleaning materials list shall be used.Any other chemical must be approved independently by the HSEQ Manager / Operations Director. |
| 2.Assess: | - | Complete the ESS COSHH Assessment form for each task involving the use of a hazardous substance. |
|  | - | The assessments shall represent observation of the actual conditions pertaining at the time of assessment. |
|  | - | A copy of the Manufacturers Safety Data Sheet (MSDS) shall be consulted to identify the hazards. Attach MSDS to assessment. |
|  | - | Complete the assessment by adding conclusions and action. |
| 3.Educate: | - | COSHH assessments, identify the needs for training, instructionAnd informing staff of safe use, disposal, and emergency procedures. |
|  | - | Train and record as detailed in Training Section of this manual. |
| 4.Control: | - | Where assessment has identified hazards, steps must be taken to reduce the risk to acceptable levels and where possible, as low as reasonably practicable |
|  | - | Substitute with safer products wherever possible |
| or | or | segregate the work to reduce the numbers at risk |
| or | or | enclose either the source of risk or protect the worker |
| or | or | ventilate the area to prevent or remove buildup of fumes |
| or | or | as a last resort or in emergency — provide appropriate personal |
|  |  | protective equipment. |

COSHH Assessments shall be kept on file for future reference or use and shall be made available to an inspector (e.g., Health & Safety Executive) if required. Copies of most recent MSDS Sheets can be sourced from the chemical supplier’s web site.

COSHH Assessments shall be reviewed annually, when circumstances or products change or where an incident has occurred which may bring into question the adequacy of controls.

Annual reviews shall be recorded even if no alterations are made to the assessment.

3.9 Control of Substances Hazardous to Health (COSHH)

**Cont.**

SCOPE

Consideration must be given to all ESS employees, the tasks they perform and substances they handle. This shall include tasks performed by Medic, Radio Operator, Administration Assistants, Accommodation Technician/Handyperson, HLO and HDA, if they are ESS employees. Where the allocation of daily work is controlled by the client, agreement must be made to ensure that ESS, as the employer, is informed of the tasks performed and hazardous substances handled. This will ensure full compliance with our COSHH procedures.

HEALTH & SAFETY ASSISTANCE

The Operations Director shall arrange for the training of Unit Managers to ensure their competence to undertake COSHH assessment.

The HSEQ Manager is available to provide/arrange for advice and assistance to ensure compliance with the requirements.

3.10 Handling Notes for Completion of COSHH Assessment

In order to comply with current legislation, it is necessary to carry out a task-based risk assessment of all tasks involving hazardous substances.

The following information is designed to assist in the method of completing the form. The cleaning agent used in this example is fictitious but will highlight and demonstrate the areas of concern associated with chemicals.

For the purpose of this exercise, the Chemical used will be called - Rapid Shift Cleaner.

COMPLETION OF FORM

Complete Unit, Assessment date and Assessor name legibly. The task title should be entered

e.g., deep cleaning of ovens and stove tops

Staff Categories Responsible for Task and Time Spent on Task - Requires a list of personnel by job category carrying out the task and the amount of time spent doing the task. This could be daily, weekly, or monthly, or even 2 or 3 times a day.

Staff Categories Responsible for Task Time Spent on Task

e.g., Galley Steward 1 hour daily

Description of Task - Summary description of the task to be carried out.

e.g., Ovens and stove tops are allowed to cool. Rapid shift solution is applied using a scouring pad. Surfaces are wiped down with damp cloth to remove suds.

Material used and MSDS held - All substances used in the operation shall be listed, the ‘MSDS held’ box ticked and the MSDS (Manufacturers Safety Data Sheets) shall be attached to the completed assessment form.

e.g. 'Rapid Shift Cleaner'

Observations - Observation must be made of actual in-unit practices and recorded:

Storage of Materials

e.g., stored in locked, secure store.

Use

e.g., decant from 5 ltr drum into container for dilution of 1 part to 20 parts.

Disposal

E.g., Waste solution emptied into drain and container swilled with large amounts of cold water.

3.10 Handling Notes for Completion of COSHH Assessment

**Cont.**

Sources of exposure and Duration of exposure and concentration - Identify any area which may come in contact with the substance used.

e.g.

* Possible spillage during decanting.
* Contact with skin or soaking into clothing.
* Eye and respiratory irritation during cleaning operation.

For each source of exposure, estimate the likely duration of exposure and the concentration

e.g.

* Duration of exposure approx. 1 hour.
* Inhalation exposure was highest when cleaning oven.
* Solution was 1 part in 20 parts.

Existing controls - What controls are in use? How often are they tested and what maintenance is carried out?

e.g.

* Rubber gloves.
* Face mask and goggles.
* Safety shoes, coveralls, and gauntlets.
* Rubber gloves were adequate but required frequent replacing.

Conclusions and recommendations - From all the information gathered in previous sections including reference to the MSDS, you should be able to reach a conclusion as to the level of risk involved in the task. Any recommendations should be put into this section.

e.g., Exposure to caustic soda when cleaning ovens causes irritation to the user's eyes and nose. It is recommended that a proprietary oven cleaner is used and that gloves be discarded after use.

Action - From the information in 'Conclusions and recommendations', you should be able to identify any action required.

e.g. Unit Manager to submit request for oven pads to be added to material list

MSDS for the oven pads should be obtained from the supplier once product approved and new assessment carried out. In the meantime, all staff to receive refresher training in use of 'Rapid Shift’ and safe use of PPE.

REVIEW RECORD

This section shall be used to record annual reviews where there has been no change to circumstances or materials. Where change has occurred, a new assessment shall be completed.

3.11 Personal Protective Equipment

The objective of this procedure is to ensure that, where personal protective equipment (PPE) is considered necessary, the control and use of PPE meets the requirements of the personal

Protective Equipment at Work Regulations 1992.

DEFINITION OF PPE

Personal protective equipment means all equipment which is intended to be worn or held to protect the wearer from risk to his/her health and safety at work, e.g., goggles, rubber gloves, safety foot- wear worn to protect those handling heavy weights. PPE does not include food hygiene clothing.

The Unit Manager shall be responsible for the implementation of the procedure detailed below:

PPE shall always be regarded as 'the last resort' in controlling risk to the health and safety of employees. Wherever possible, some other form of control should always be considered first. See COSHH Assessment detailed procedure, Step 4.

Where a risk has been assessed and PPE is deemed necessary, the Unit Manager shall ensure that:

The appropriate PPE is always readily available.

PPE is maintained, clean and replaced as required.

Staff required to use PPE are adequately informed, instructed, and trained in the risk being controlled; the manner of use; and the procedures to ensure it is in good condition and replaced as necessary.

Where more than one item of PPE is required to protect from a risk, that the different items are compatible and do not affect their respective efficiencies.

PPE is safely stored when not in use.

HEALTH & SAFETY ASSISTANCE

The HSEQ Department are available to provide/arrange for advice and assistance to ensure compliance with the requirements

3.12 Near Miss Reporting

All members of the crew shall be responsible for recognising hazards at work and for taking appropriate action to prevent a hazard persisting and causing an accident or incident.

OCCUPATIONAL HEALTH & SAFETY HAZARDS

The work activities of the catering operation can, if not properly carried out, present hazards to the worker or those likely to be affected by his/her work.

The Unit Manager shall ensure that all crew know the safe work practices; the common hazards; and the correct procedure on spotting a hazard.

The Energy General Risk Assessment and Specific Risk Assessments, Service and Hygiene Inspections and Behaviour Monitoring will identify hazards and shall result in action to remedy the hazards and prevent their recurrence. On units where client safety observation schemes are in use, the appropriate reporting document will be completed and submitted to clients as part of the interface procedure.

The technique of unsafe act auditing is described in full in Proactive Behaviour Monitoring in Procedure 3.13.

Any member of the crew spotting a hazard shall take appropriate steps to rectify the situation:

If safe to do so, shall remove the hazard or warn others likely to be affected.

Report the hazard to his/her manager, and record the hazard and action taken on the Safe Working Essentials Observation Card.

High potential Near Misses may require further investigation. The Unit Manager should dis- cuss with the HSEQ Manager if in any doubt.

Follow the General Safety Statement described in Onshore Induction - Appendix to Section 4.

ENVIRONMENTAL HAZARDS

Environmental Impact Assessment may identify situations which have an adverse effect upon the environment. Action plans should be put in place to remedy such situations where practicable.

All members of the crew receive instruction on the Environmental Policy and are made aware of the Aspects / Impact Register during induction. This includes the need to avoid unnecessary consumption of natural resources. Further environmental training is provided using the Compass Environmental Toolkit and the Aspects and Impacts Register. Supervision, STOP etc. and a Toolbox Talk should be used to maintain satisfactory performance.

Catering staff should be encouraged to recognise instances of unnecessary consumption of water and electricity, poor adherence to waste segregation and chemical spillages, and to follow through the action described above, when spotting a hazard.

3.13 Proactive Behaviour Monitoring

We are all too aware that, despite communications about the individual's responsibility for safety and the provision of training, supervision, and inspection - people will still commit unsafe acts, work in un- safe conditions, and infringe environmental practices.

Proactive behaviour monitoring, such as Step Change in Safety’s Safe Working Essentials.programme, adopted by ESS, as an organization, provides a further dimension to the formal arrangements for ensuring a safe and healthy work environment by involving all levels of personnel in the recognition of unsafe practices. The resulting heightened safety awareness must reduce the likelihood of accidents, foster safety consciousness at all levels, and remove the basic cause of many accidents. When unsatisfactory environmental practices or conditions are observed, the procedure operates in the same way.

The Unit Manager can employ the following techniques during inspection tours or on an ad hoc basis.

TECHNIQUE

The technique depends on an open discussion of individuals' performances in a just culture, in order that they should recognise their own unsafe acts and commit themselves to safer working. Good results depend on the understanding and trust of those being audited as well as the skills and attitudes of those making the audits.

HOW TO OBSERVE

* At the worksite, stop for a few minutes and observe the work activity.
* Concentrate on people working, not on things.
* Be alert for unsafe practices that are corrected as you enter the area.
* Categorise activities systematically. Consider:
	+ Actions of people
	+ Positions of people
	+ Personal protective equipment
	+ Use of utensils and equipment
	+ Procedures.
* Question 'Why?' and 'What if . . .?' Keep an open mind.
* Recognise good as well as poor working practices.
* Do not take notes whilst observing activities; it can create distrust.

3.13 Proactive Behaviour Monitoring

**Cont.**

DISCUSSION

The objective of discussion is to have employees participate in improving performance through recognising and correcting their own unsafe acts, the unsafe conditions they cause, and acts which may have a detrimental effect on the environment.

Method

Ways to achieve this objective will depend on individual situations and personalities, but some suggested points to consider are:

* Do not rush. Take time to put employees at ease.
* Be open and direct, but not confrontational.
* Question and discuss; do not lecture; keep listening. Allow employees themselves to identify the hazards and to volunteer improvements in their working practices.
* Guide discussions; do not manipulate.
* Commend good performance.
* Make it a mutual learning experience for both line management and employees.
* Help do not blame. Observation should not normally result in disciplinary action, an exception being where conduct consistently violates safety rules.
* Be aware that the reactions, and the standards shown to be acceptable, will be critical to the continued raising of standards.
* Encourage employees to discuss their safety concerns and offer ideas.
* Write down their concerns and ideas and ensure that they are followed up and the out- come communicated to the employees.
* Do not leave an area without discussing your observations with the employees, as this omission is certain to generate unease and distrust.
* Thank employees for their participation.

Recording

The findings and actions shall be recorded on the Safe Working Essentials Observation card and can also be recorded on whatever client specific system in place on the installation.

Follow Up

Report forms provide feedback on safety, environmental performance trends and specific items to be followed up. They will show where the weaknesses are, where procedures require strengthening and where training is needed. They will help to form the basis for developing an action plan to improve performance at the worksite.

The findings, performance trends, action in respect of employees' suggestions, and action plan, should be discussed during the HSE meetings.

Pre tour briefings give everyone the opportunity to focus on safe working at the beginning of their shift. They are informal and should focus on those topics relevant to the shift just finished and the shift about to start and be recorded on a Pre-Shift Meeting form.

3.14 HSE Meetings

Trip HSE Meetings provide a more formal opportunity to discuss health, safety and environmental (HSE) matters. The meeting should provide the opportunity for all present to gain a common under- standing of HSE communications from ESS Operations and HSEQ; client operations and safety management; and to put forward and discuss individual perceptions of conditions/work activities which contribute to or constrain the achievement of HSE targets.

The Unit Manager shall ensure that all ESS crew attend a minimum of one HSE meeting per off- shore trip and that this shall normally be within the first seven days of the Manager's trip. The meeting shall be conducted in accordance with the following:

* The agenda should be posted 48 hours prior to the meeting. See Section 2 for Standard Agenda.
* The meeting should not normally exceed 1 hour's duration.
* The meeting may be chaired by the Unit Manager, safety representative or other volunteer from within the ESS team.
* Minutes should be recorded on the standard report format by a secretary nominated by the Unit Manager. (Client meeting report may be used where the client is insistent).
* The meeting shall follow the standard agenda which is detailed below together with instructions for conducting the phases of the meeting. The meeting report provides examples of the possible content under each agenda topic.

STANDARD AGENDA

Feedback from Previous Meetings:

This should address any points raised for further action and the status of any outstanding actions, any comments received from the Operations Director, HSEQ or Client Representatives.

Incident Review:

The review should include review of the unit Safe Working Essentials Observation cards, providing feedback on any actions which have been taken to prevent recurrence. The review should also include incidents which have occurred at other locations, e.g., reference to monthly See, Care, Share Communications Bulletin.

Health, Safety and Environmental Performance:

* The report on safety performance should include actual performance against the objectives detailed in the annual HSE Programme and where appropriate, the overall installation performance.

Safety Alerts:

* Discuss Safety Alerts, Lessons Learnt etc. issued by the Client Company or ESS. Ensure that the meeting understands their relevance to the unit.

Client Activities:

* Discuss other unit activities to ensure that all personnel are aware of the ‘Total picture', which is important in raising safety awareness and levels of interest generally.

Theme Presentations:

* Take the opportunity to address a relevant 'theme topic'. This may be one provided by ESS HSEQ Manager, our client, or one of relevance to unit performance, e.g., related to incident or observation on board

3.14 HSE Meetings

**Cont.**

New Business:

* This phase of the meeting should address any other safety related matters raised by members of the ESS team onboard, Client Company management, ESS management, and as appropriate.

Where applicable, the party nominated to pursue action and target date shall be agreed.

Outstanding Action Status and Action Party Feedback shall be clearly identified and documented accordingly. These items shall be referenced to the original meeting date and minute item number.

Client Copy

The Client Offshore Representative shall be provided with a copy of the minutes which request that his/her comments be passed back to the Unit Manager for attention at the subsequent safety meeting.

Reference

HSE Meeting Reports shall be completed and returned as detailed in Section 2.

3.15 Occupational Health, Safety & Environmental Themes

HSE Theme presentations provide the opportunity for refresher training of all crew to meet needs identified through routine supervision/inspection or to respond to incidents, which have occurred on the installation or at another ESS unit.

Theme notes are provided throughout the year by ESS HSEQ Manager. Managers shall develop other themes as appropriate. Assistance and material can be provided by ESS HSEQ Manager.

The Unit Manager shall utilise, as appropriate, the theme notes in whatever order which suits their installation. Planning should take into account priority and variety. Themes supplied from the ESS HSEQ Manager should be used as near the intended date as possible but should not take preference over priority unit requirements.

Themes should be delivered using the recommended instructional techniques as detailed below.

Introducing the Theme

The opening paragraph of each theme provides the introductory words for each presentation.

Developing the Theme

The main body of the theme should take the form of a question/answer session with discussion of real-life examples wherever possible.

Consolidating the Theme

The main points of the theme should be summarised, and a plan of action agreed for their implementation back at work.

Theme sessions delivered at HSE Meetings shall be recorded on the HSE Meeting Report Form. HSE Themes delivered at other times shall be recorded on a Toolbox Talk Form (SCIS)s Session Record. See Procedure 3.16.

A range of Safety Campaign material can also be found on the HSE Website within Compass Connect. All material is fully downloadable and can be utilised throughout the business year:

Themes Available on HSE Website include.

* Hand Protection Toolkit
* Slips, Trips & Falls
* Allergen Awareness
* You Matter

3.16 Toolbox Talks

Toolbox Talk Forms (SCIS) (Pre-Job Safety Conversations/Briefings) provide the opportunity to refresh the work team's training in safe methods of work prior to carrying out a specific task. This may be seen as necessary because:

* the task is non routine
* changes may have happened in the work environment since it was last carried out
* the task involves potential hazards
* the work team are unfamiliar with each other
* Previous performance has suggested the need for refresher training.
* the task involves potential impact to the environment

The Unit Manager shall ensure that the Toolbox Talk Form (SCIS) is implemented where appropriate by him/ herself or relevant supervisor.

Toolbox Talk Form (SCIS) should involve the work team by question/answer and should ensure full understanding by the entire team of the planned execution of the task prior to its commencement.

The record form promotes a risk analysis approach. The component steps of the task should be identified, along with the hazards present at any step. The controls required to reduce the risk to 'as low as reasonably practicable' should be appended in the control column.

Coverage of the analysis should form the main content of the Toolbox Talk Form (SCIS) with the team being encouraged to make their contribution.

On units where ESS operates a Facilities Management contract the Toolbox Talk Form (SCIS) format shall be used for briefing sub-contractors carrying out work on the installation.

Toolbox Talk Form (SCIS) shall be recorded on the 'Toolbox Talk Form (SCIS) Record' and a sample of two enclosed with the Trip Debrief & Unit Report.

3.17 Accident & Incident Reporting

The reporting of accidents and incidents enables investigation and the identification of causes, which assists in the prevention of future and perhaps more serious accidents or incidents.

Any accident/incident must be reported without delay to the Unit Manager and to the client's medical representative.

The primary concern in the event of an accident must be the well-being of the party(s) involved. Whilst giving this priority, it is helpful to the subsequent investigation if the conditions relating to the scene, at the time, are recorded. This may be by taking photographs, making drawings/sketches, or writing down the observed details, taking statements from witnesses to the event, as soon as convenient after dealing with the needs of those affected.

ACCIDENT NOTIFICATION

Any accidents, incidents or high potential near misses must be notified to the HSEQ Department and your Operations Director within 24 hours by phone and by email to hseq.aberdeen@compass-group.co.uk

Within 24 hours, the Accident / Incident Notification form should be submitted giving initial details of the incident.

ACCIDENT INVESTIGATION

The Unit Manager shall use the ESS Incident Pack to guide the investigation of the circumstances and identification of suspected "Immediate Causes" and "Underlying Causes". Sufficient time should be given to the investigation to ensure accurate findings. Investigation guidance is provided in procedure 3.18.

Witness form shall be completed whenever possible as this helps to establish a clear picture of the incident and should assist in identification of causes and therefore prevention of recurrence.

ACCIDENT REPORTING

Completed forms should be emailed to hseq.aberdeen@compass-group.co.uk

The reporting of major incidents and over seven-day absences from work, as specified under *Re- porting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)*, is the responsibility of the client.

The reporting of diseases under *RIDDOR 2013* is the employer’s responsibility, i.e., ESS. If any employee is diagnosed as having a reportable disease, the Unit Manager shall make the HSEQ Manager and Operations Director aware of the situation and ensure that copies of MED 3 Form, sick lines or doctor's letters are forwarded to the Aberdeen Office for the attention of the HR & Personnel Logistics Coordinator.

Environmental incidents shall be reported to the Contract Client in the first instance and the HSEQ Manager who shall advise what further action is required.

An analysis of all offshore accidents/incidents shall be circulated with the monthly See, Care, Share Communications Bulletin.

3.18 Accident & Incident Investigation

The Incident Pack and Investigation Guidance documents provide the detailed information to support the Accident/Incident Notification form.

The following information is designed to assist in completing the form with the correct, relevant de- tails.

* Date of event. - This is the date of the incident
* Unit: Your unit's name
* Brief description of event: Use the description given on the Accident/Incident Notification. Together with 1. & 2. This allows the linking of reports.
* Circumstances leading up to the event: Activities that happened prior to the incident that may have had an influence on the person(s) involved in the incident or the incident site.
* What happened? Describe in simple terms what the incident comprised. This should be factual and the result of interviewing the accident victim(s), witnesses or first on scene.
* Immediate action taken and by whom: Describe the first action taken to make the worksite safe.
* Witness details: List the names of any witnesses and attach their statements.
* Investigation Team: Provide the names, job titles and employers of all involved in the investigation team.
* Any other observations: Note any other information that may be relevant to the incident.
* Signed: Sign, add your job title and the date of completion of the report. The report will be re- viewed by the ESS HSEQ Manager.

Following receipt of the Incident Pack and supporting documentation the HSEQ Manager will conduct a Root Cause Analysis and prepare a report including any corrective or preventative action required. All action should be closed out within the agreed timescales and the report signed and returned to

hseq.aberdeen@compass-group.co.uk

ASSISTANCE

The HSEQ Manager will be happy to provide/arrange for advice and assistance in completing the investigation and report.

3.19 Liaison with Client Safety

It is essential that all crew are fully conversant with unit safety and environmental management Arrangements, drills, musters, any individual muster duties, and rules of waste segregation etc.

The Unit Manager shall ensure that:

* All new employees attend Installation Induction/Safety Briefings.
* Full co-operation with Installation Management is always maintained.
* Any identified problems/concerns are communicated immediately to Installation Management.
* All employees attend client HSE Meetings/Training Sessions as required.
* Full co-operation/participation is given to client safety initiatives/programmes, e.g., STOP.
* All crew nominated to carry out installation safety/muster duties are fully conversant with these duties and receive all necessary information and training. Special attention shall be paid to new and relief crew.
* All employees fulfil their role in collecting, segregating, storing, and disposing of household waste as appropriate.

3.20 HSEQ & Operational Visit

The objective of this procedure is to ensure that the ESS HSEQ visit meets the client and ESS' expected frequency and promote the continuous improvement of standards of health, safety, and environmental and quality performance through the audit of implementation of the management system (Quality & HSE), site inspection, liaison with employees and client, feedback, and training.

* Visits to be carried out, as far as possible, to conform to the schedule prepared in conjunction with operations.
* Client Company notification and travel shall normally be arranged through the HR & Personnel Logistics Coordinator.
* Preparation for offshore visits shall include identification of specific target areas from trip safety returns and review of last audit report (when available).
* The visit shall be carried out in the form of a Listening Visit or Compliance Audit. Style to be decided by the auditor depending on previous audit performance, staff performance and operational or time constraints.
* Each visit shall include
	+ Observation of work in all areas.
	+ Utilisation of "unsafe act auditing" or "STOP" technique.
	+ Training:
		- On job training on a one-to-one basis where required.
		- Off job training sessions to all crew as support to unit manager as required.
	+ Assistance in planning training or other safety initiatives as required.
	+ Meetings with client offshore representative, Medic, client safety representative as appropriate, to discuss audit, ESS safety performance and installation safety initiatives.
	+ Feedback:
		- Discussion of audit findings and agreement of corrective action with the Unit Manager
		- Any outstanding action shall be reviewed, and further action agreed
		- Discussion of audit findings with client offshore representative

3.21 Hazard Analysis & Risk Assessment

The objective of this procedure is to identify hazards in the workplace and ensure that appropriate action is taken to remove the hazard or contain the risk and prevent harm.

A list of all tasks showing those that have resulted in an accident in the last five years is held in the HSEQ department in Aberdeen. An SWP has been completed for each task and, for those deemed of acceptable risk, no further assessment is considered necessary at this time. All other tasks are listed in the Energy General Risk Assessment.

The Unit Manager is responsible for completing and maintaining the Energy General Risk Assessment in accordance with the guidance notes. It is recommended that he/she involve the crew in making the assessment.

* Return a copy of the completed 'Unit Specific Assessment Report' to the HSEQ Manager for re- view.
* Use the completed Energy General Risk Assessment in the induction and training of staff to ensure that they are aware of the hazards affecting their worksite, understand the application of preventive and protective measures and the residual level of risk.
* Hold the original copies of the completed Energy General Risk Assessment and Unit Specific Assessment Report on file in the unit for inspection.

The HSEQ Manager shall review all Unit Specific Assessment Report and provide feedback where appropriate.

The Energy General Risk Assessment shall be reviewed and updated as part of the accident/ incident review process; and at least annually, or as circumstances dictate.

Significant hazards which involve hazardous substances, stress, manual handling, the use of display screens, or working at height shall be subject to further assessment as detailed in Procedures 3.9, 3.23, 3.24, 3.25 and 3.29.

3.22 Risk Rating System

The ratings shown below are for application to the risks identified as remaining after taking into ac- count the Preventive and Preventive Measures in place.

Multiply *Likelihood of Occurrence* and *Hazard Severity* scores to calculate the risk rating, e.g., a task with Medium (3) Likelihood and Low (2) Severity gives us the calculation 3 x 2 = 6, as shown in the relevant box on the matrix and is shaded pale grey.

The key below the matrix describes the action necessary for each level of rating.

|  |  |
| --- | --- |
|  | Hazard Severity |
| Low (1) | Low (2) | Medium (3) | Medium (4) | High (5) |
| Negligible injury no absence from work | Minor injury- requiring first aid treatment | Injury leading to a lost time accident | Involving single death or serious injury | Multiple deaths |
| Likelihood of Occurrence | Low (1) | A freak combination of factors would be required for an incident to result | 1 | 2 | 3 | 4 | 5 |
| Low (2) | A rare combination of factors would be required for an incident to result | 2 | 4 | 6 | 8 | 10 |
| Medium (3) | Could happen when additional factors are present but other- wise unlikely to occur | 3 | 6 | 9 | 12 | 15 |
|  | Not certain to happen but an |  |  |  |  |  |
| Medium (4) | additional factor may result in an incident | 4 | 8 | 12 | 16 | 20 |
| High (5) | Almost inevitable that an incident would result | 5 | 10 | 15 | 20 | 25 |

Risk may be acceptable. However, review task to see if risk can be reduced further.

1-6

Task should only proceed with specific management action. Where possible the task should be redefined to take account of the hazards involved or the risk should be reduced further prior to task commencement

7- 14

Task must not proceed. It should be redefined, or further control measures put in place to reduce risk. The controls should be re-assessed for adequacy prior to task commencement

15 - 25

3.23 Managing Stress

The objective of this procedure is to assist Unit Managers to identify and control the sources of un- due stress at work.

In addition, managers should aim to help employees to help themselves to manage stress.

The Workplace Stress Risk Assessment is included in the appendix to this section of the manual. The Unit Manager is responsible for completing this as appropriate to their unit.

Along with the Risk Assessment, ESS have introduced the Stress Talking Toolkit, which is a guidance document with example conversations based on stress scenarios that may be faced by our managers in the day-to-day operations. This document is also included in the appendix to this section.

This toolkit should only be completed where an employee identifies they are experiencing workplace stress and/or their manager or team identify any workplace stress concerns. The toolkit is to be used with individuals on a one-to-one basis to support them through their workplace stress or with a small team where stress is affecting the entire team. **If you are unsure if this is the appropriate next step, please contact your Line Manager or your Sector People Business Partner.**

**All forms associated with the Offshore Operating Manual are available for download from the ESS Sector Specific section of the HSE Website on Compass Connect**.

3.24 Manual Handling Assessment

The objective of this procedure is to ensure that any tasks involving manual handling, where there is a risk of injury, are thoroughly examined to reduce the risk to as low as reasonably practicable, in line with the Manual Handling Operations Regulations 1992 (amended 2002).

The Unit Manager shall be responsible for completing the assessment, including a practical lifting, and handling exercise, the manager shall review the listed manual handling tasks to ensure that they are relevant to his/her unit, deleting or adding tasks as necessary.

The Unit Manager shall ensure that identified action is pursued without delay.

Where the action is not within the scope of the Unit Manager, notification shall be made in writing to the Operations Director and/or client as appropriate.

On completing the generic assessment, the final column of Part B, *Action Completed* shall be filled in, and the *Check* section on Part A shall be signed and dated.

The Manual Handling Assessment shall be kept on file for future reference or use and shall be made available to an inspector if questioned about your precautions.

Manual Handling Assessments shall be reviewed annually and when circumstances change, in line with the Risk Assessment Procedure 3.21.

3.25 Display Screen Equipment

The objective of this procedure is to ensure the assessment of the health and safety risks to users of display screen equipment (e.g., visual display units) and the reduction of such risks to as low as reasonably practicable in line with the Health & Safety Display Screen Equipment Regulations 1992 (amended 2002).

Each Unit Manager shall complete a risk assessment of his/her workstation and record the assessment on Display Screen Equipment Risk Assessment questionnaire. The second page of the assessment is in the form of an action plan. Record the action necessary to address any 'NO' answers in the risk assessment, set a target date and record when the action is closed out.

Where further assistance is identified as necessary, the HSEQ department shall provide information and guidance on assessment.

Completed assessments shall be kept on file for future reference or use and shall be made available for inspection if required.

3.26 Working Beyond Tour of Duty

The objective of this procedure is to ensure that any employee who must work beyond their normal tour of duty does not cause or incur any additional risk to health and safety or undue stress in fulfilling their role.

Working beyond the normal tour of duty shall be the exception not the rule but will occasionally be required due to being weather bound or a 'no show' by one's 'back-to-back'.

It is important that appropriate consideration of the pressures and distractions that may affect the person are identified, understood, and controlled.

The Unit Manager shall be responsible for completing the risk assessment for any member of his/her crew in the above position at the earliest time after the requirement for extending the tour is identified.

* A copy of the generic risk assessment form should be completed for the person(s) working be- yond their tour of duty.
* Completion should be done jointly with the person. This is to ensure that they understand the possible additional risks and their part in preventing them.
* At the beginning of each further additional shift (day), the Unit Manager and the person shall meet to review the status and to refresh the need to continue to work safely.
* If, despite having utilised the risk assessment, the Unit Manager feels there is still an unacceptable risk to health and safety he/she shall take advice from their Operations Director the installation medic and act accordingly.
* If the person working the extended tour is the Unit Manager, the Operations Director or deputy shall carry out the procedure by telephone.

3.27 Knife Safety

The Unit Manager shall ensure that any knives used in our activities, whether provided by the company or employee, are safe and suitable for their purpose.

Galley knife use shall be in accordance with the Galley Knife Policy.

Knife training and competence assessment standards are detailed in Procedure 4.5.1. Galley knives must not be used for anything other than their intended purpose.

A risk assessment must be completed for any non-routine galley knife tasks and any other knife use in other aspects of our activities.

CUT PROTECTION

* Chain mail gloves must be worn for butchery work.
* A chain mail or cut-resistant glove must be worn on the at-risk hand when sharpening knives, whether by steel or using any other sharpening device.
* A cut-resistant glove of the appropriate gauge must be always worn.
* Stewards must wear a cut-resistant glove for all tasks and must not undertake higher risk tasks including cutting cabbage or swede / turnip.

ELIMINATING UNECESSARY USE OF KNIVES

Where possible the use of knives shall be eliminated or substituted by scissors or safety knives. This should include cutting tasks in storerooms and tasks in areas other than the galley.

Examples:

* Galley chopping and shredding tasks may be completed using a food processor instead of cutting by hand.
* Please note it is mandatory that cut-resistant gloves are worn when handling food processor/ food slicing blades.
* Scissors should be used for cutting pergal nozzles, frozen vegetable packets, etc.
* Safety knives should be readily available in the stores for cutting tape and opening cardboard boxes, etc.

On job training, utilising the Hand Protection Toolkit, should be carried out with all knife handlers annually.

3.28 Assessing Unit Safety Performance

The objective of this procedure is to formally recognise units consistently meeting health, safety, and environmental requirements.

The assessment of performance will normally occur at the time of annual performance review.

Performance is measured over the safety year by monitoring routine audits, implementation of HSE initiatives, and accident reports.

A unit must meet the following requirements:

* Implementation of the procedures for managing safety as described in the Offshore Operating Manual, including up to date risk assessment and hygiene and safety inspections.
* Satisfactory implementation of the required standards of training, with up-to-date records.
* Completion and submission of accurate Trip Debrief & Unit Report, including the required minimum number of Toolbox Talk Form (SCIS)s.
* Evidence of effective HSE Meetings, including review of the unit Safe Working Essentials Observation Card participation.
* To be implementing pre-tour briefings and recording these.
* To have demonstrated commitment to client and ESS HSE initiatives, e.g., use of STOP, START, completion of HSE Activities Quarterly Feedback sheets etc.
* To have accurately recorded, fully investigated, and reported all accidents/incidents including near misses in accordance with procedure 3.17 and notes shown in 3.18.
* To have implemented remedial actions identified because of accident / incident investigation.

3.29 Working at Height

The objective of this procedure is to assist Unit Managers to comply with the requirements of The Work at Height Regulations 2005 (Amendment 2007).

"WORK AT HEIGHT"

A place is at height if a person could be injured falling from it, even if it is at or below ground.

'Work' includes moving around at a place of work (except by a staircase in a permanent workplace) but not travel to and from a place of work.

Our first principle shall be to avoid work at height where this is possible.

RISK ASSESSMENT

A generic 'Working at Height' Risk Assessment is included in the appendix to this section of the manual. The Unit Manager is responsible for completing this as appropriate to their unit.

Review the specific hazards as they apply at your unit and amend the risk assessment to meet local conditions.

Add any other tasks carried out at your unit involving working at height where there is a risk of injury.

Where a safe method of access and working is a necessary control, this should be drawn up for the task.

If there is any doubt that the identified risks are adequately controlled, then further action must be identified. The residual risk rating should be assessed in accordance with the rating matrix on page 27 of this section of the manual.

Action should be taken in accordance with the risk rating score and shade coding. Ensure that any identified equipment is available and maintained in a safe condition.

Provide identified training to all who may carry out the task and assess their ability to complete it competently.

Managers should work with their crew to reduce identified risks.

REVIEW

The Risk Assessment should be reviewed annually or when circumstances change.

ASSISTANCE

The HSEQ Department shall provide further assistance as required.

3.30 See, Care, Share

3.31 Health & Safety Appendix

Instructions for the use and completion of the forms are detailed in the appropriate procedures in this section of the manual.

**Policies are contained on the HSE Website, ESS Sector Specific section on Compass Connect, along with all forms.**

Forms:

* Register of Chemicals
* COSHH Assessment Form
* Energy General Risk Assessment
* Manual Handling Assessment
* Generic Manual Handling Assessment
* Display Screen Equipment Risk Assessment
* Workplace Stress Risk Assessment
* Stress Talking Toolkit
* Accident / Incident Notification
* Incident Pack
* Working Beyond Tour of Duty Risk Assessment
* Working at Height Risk Assessment
* Applicable HSE Legislation
* Safe Work Procedures
* Safe Working Essentials Toolbox Talk Interactive

Policies

* Compass HSE Policy
* Environmental Policy
* Compass Quality Policy
* Galley Knife Policy and Safe & Correct Knives Use Procedure
* Occupational H&S Management System
* Occupational Health & Safety Policy
* Occupational Stress Policy