

Life-Saving Rules

PDO Investigation Guidance for
Life-Saving Rule violation



Guidance – Investigating a Life-Saving Rule violation

Who is this for:

PDO HSE Line Managers and Team Leads

Purpose:

This is intended to assist the Line and HSE professionals in outlining how the Line, HSE and HR can work together in the investigation of a Life-Saving Rule violation. The HSE incident investigation steps reflected are in line with the PDO Incident Reporting Procedure – PR1418

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General Principles

First, we need to start with the end in mind.

- The rules are there to keep all of us safe,
- to drive higher levels of sustained compliance and
- to propel PDO further towards Goal Zero.

Second, there is no substitute for sound judgment and common sense.

- Both need to be exercised especially in the application and enforcement of the rules.
- Every situation will be different and will call for a unique response.

Third, everyone needs to honour both the letter and the spirit of the Life-Saving Rules.

- It is about No Harm, complying with the rules, looking out for yourself and your colleagues and “doing the right thing”.
- It is not about creating a collective sense of paranoia and distrust so that PDO loses the ability to deliver safe workplaces.

General Intervention Guidance

The individual's attention should be drawn to the potential Life Saving Rule breach. He should be informed of the applicable rule and the manner in which he has been seen to breach it. He should be asked:

- If he was aware of the rule
- Why he breached it
- If the rule has been discussed during the Tool Box Talk
- If it is mentioned on the Work Permit.

Details of the intervention should be made during the investigation and submitted.

- record names of the person seen in breach of the rule,
- Names of his immediate supervisor/contractor
- Names of the persons making the intervention

Close the intervention by making sure the situation is safe and informing the person seen breaching the rule that the event will be subject of further investigation.

Inform the PDO site lead contractor manager (for contractor staff) and the site HSE Lead .

Peer to Peer Intervention

Fundamental assumption – everyone knows/understands the rules

Everyone should ensure that we stick to the Rules and always intervene where there is unsafe working. This applies to your co-workers, peers and others.

We do not want to instill a culture of fear that inhibits interventions, therefore...

Frontline peer to peer intervention is to be encouraged at all times and is excluded from consequence management provided that:

- The result of intervention is an immediate behaviour correction. In this case there is no need to escalate other than to report on FIM

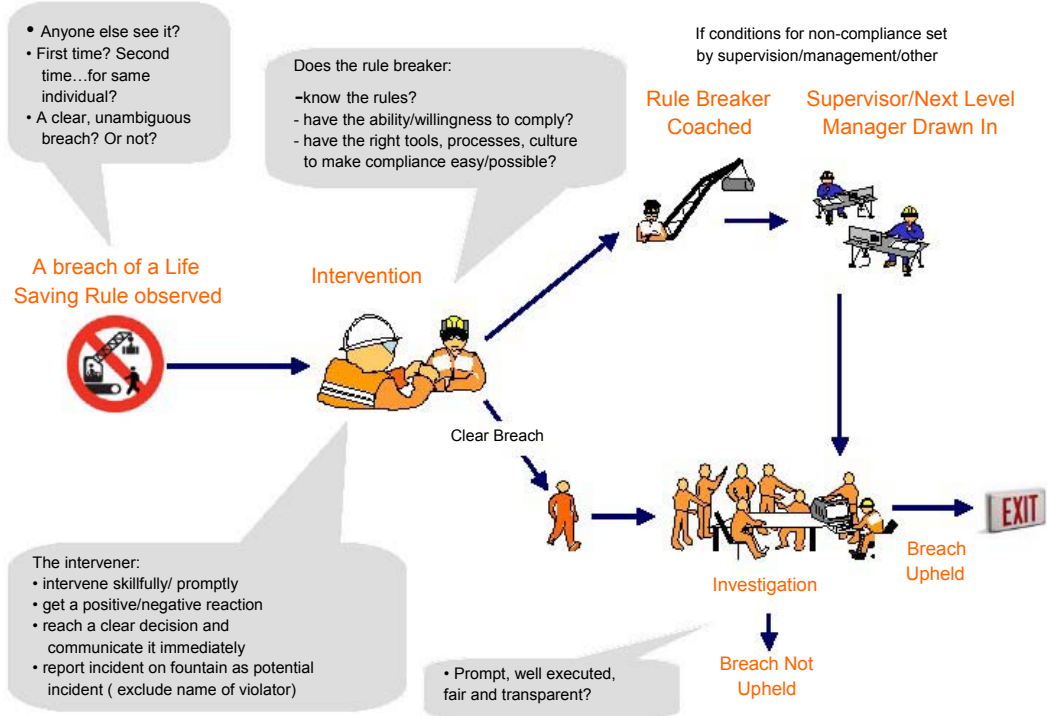
However:

- if the result of an intervention does not immediately result in a change in behaviour, then it is your obligation to bring this to the attention of your supervisor
- if the Life-Saving Rules violation jeopardizes multiple lives it must be reported and escalated immediately

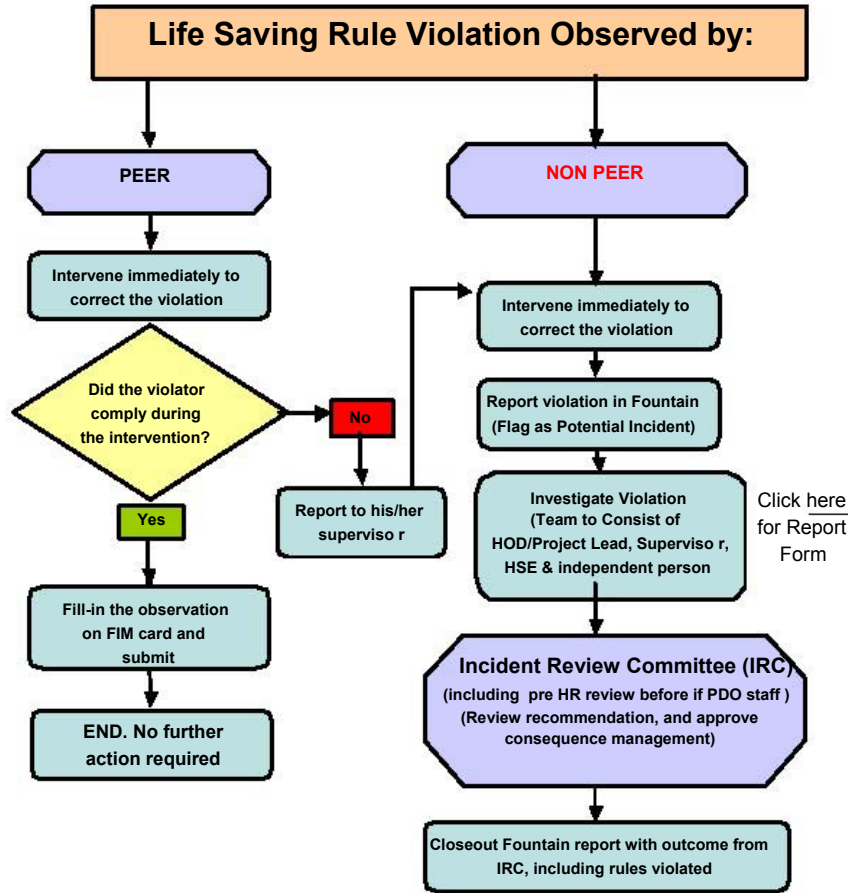
All escalations to be thoroughly investigated – using sound judgment, common sense and to the spirit of the Life-Saving Rules

If in doubt, always consult your supervisor

Non PEER intervention



Life Saving Rules Violation reporting flow chart



Peers

Peers are people who work together on a day to day basis and have no line supervisory responsibilities to each other. e.g:

- Production operator to another production operator
- Production operator to a maintenance technician and contract workers (scaffolders, painters, welders)
- Roughnecks to roustabouts
- Maintenance supervisor to a production supervisor
- Contractor worker to another contractor worker (welder to a scaffolder, crane operator to a welder)
- roughnecks and roustabouts
- Project site supervisors on multi-site projects

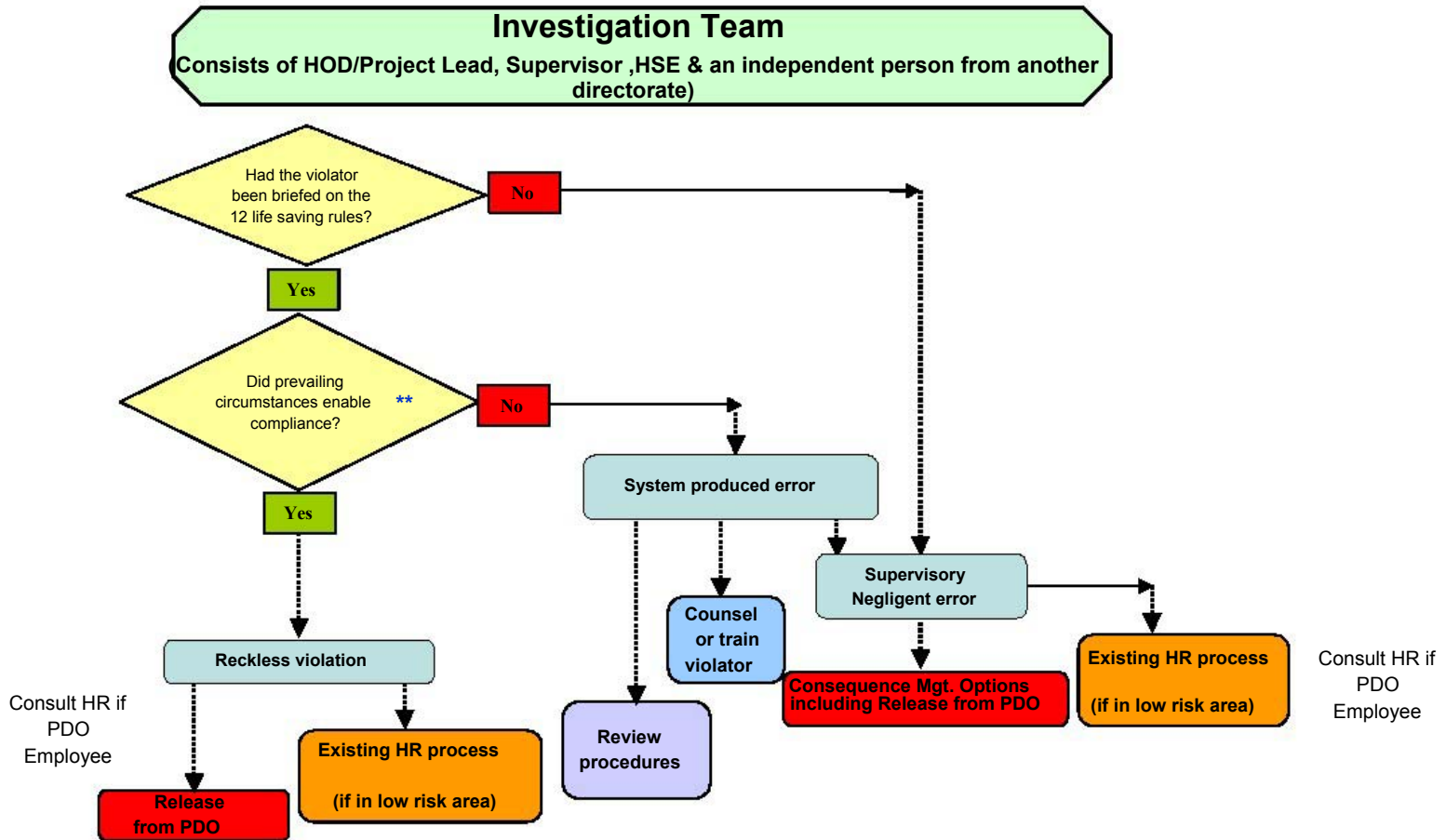
Non Peer

Anyone in a hierarchical (e.g. boss to subordinate or vice versa) or supervisory/oversight relationship.

- Line supervisor to a worker on site
- Cross line supervisors to workers e.g. maintenance supervisor to production technician; supervisor of a crew of welders to a scaffolder in another crew.
- Manager on site visit to anyone on the site
- HSE technician/officer/lead to anyone on site
- Staff engineer on site-visit to anyone on site
- Permit issuer to workers working under the permit
- Employee to their supervisor/manager
- A driver to a passenger (driver is the "supervisor" of the vehicle)
- Contractor Safety Representative to his crew or to another crew on site

- Non Peers to have at least one witness - both must agree on violation
- Investigation conclusion to decide if Violator to be given warning letter or not

Consequence Management Decision Tree



Low risk area : PDO Offices and Residential areas e.g MAF, PDORC

Investigation team to include contractor rep where contractor staff is the violator

** The investigation should establish how any other person faced with similar circumstance would act.

LIFE-SAVING RULE VIOLATION INVESTIGATION REPORT FORM

(Only for Life Saving Rule Violation - potential incidents without consequences,
for those incidents with consequences full investigation process is to be followed)

Activity/Project _____	
Site/Activity HSE Adviser: _____	Violator's Supervisor: _____
Company Site Representative (CSR): _____	Site/Activity Owner (Contract Holder): _____
Contractor Representative: _____	Investigation Team Lead: _____

Life Saving Rule(s) Violated (Brief Description of violation/incident) Date: _____	
Name of Violator	
Has violator been briefed on the Life Saving Rules? Enter Yes or No + When/Why not/Comment	
Did prevailing circumstances enable compliance Enter Yes or No + Describe/Comment	
Was this a Reckless violation Enter Yes or No + Comment/Other violation type (e.g. Organizational, Procedural etc.)	
<u>Consequence Mgt. Recommendation</u> 1. Violator Contractor or PDO 2. Supervisor & Manager of the Violator Contractor or PDO (Coaching, disciplinary process, or release or if contractor removal from PDO site and disqualified from future PDO work)	

Signatures/Date

_____ Incident Investigation Team Lead	_____ HSE Adviser
_____ Site/Activity Owner (Contract Holder)	_____ Contractor Rep. (If violator is a contractor)

WHAT ARE THE LSR?

The Life-Saving Rules



Obtain a valid Permit to Work whenever required for the task at hand.



Conduct gas tests whenever required.



Verify isolation before work begins and use the specified life-protecting equipment.



Obtain authorization or a valid Permit to Work before entering a confined space.



Obtain authorization or a valid Permit to Work before overriding or disabling safety-critical equipment.



Use specified fall-prevention equipment when working at height.

The Life-Saving Rules



Do not walk under a crane or suspended load.



Do not light up cigarettes, cigars or pipes in no-smoking areas.



Follow the prescribed safe Journey Management Plan.



Wear seat belts when in a moving vehicle.



While driving, do not use a mobile phone and do not exceed speed limits.



Do not drive or work under the effect of drugs or alcohol.