PRO-4.5-0001-0-01
Control of Work

Version: 3
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Authorised by: Michael Learmonth & Owen Quake
Authorisation Date: 2/6/2016

This document has been approved for release and changed as per the associated eMoC.
To review changes to this document refer to previous versions held in the Controlled Document Database.
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1. **Purpose**

Whenever BP conducts construction, maintenance, demolition, remediation and other similar work that are typical of our industry, there is the potential for harm to people and the environment and for damage to equipment. An effective Control of Work process provides a work environment that allows tasks to be completed safely and without unplanned loss of containment with the potential to cause environmental damage or to damage a plant or equipment.

This procedure sets out the framework for the required approach to manage work risk and to comply with the requirements of GDP 4.5-0001 Control of Work and OMS Group Essential 4.5.1.

2. **Scope**

The requirement specified in this procedure applies equally to BP employees, contractors and visitors engaged in BP ANZ Fuels Value Chain; Marketing, Supply & Logistics.

Specific sites, areas and activities may have more detailed OMS requirements and where these exist the requirements will be specified in local procedures, safe work instructions, manuals, handbooks or specific standards.

3. **Definitions**

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td>ANZ MS&amp;L</td>
<td>Australia and New Zealand Marketing, Supply and Logistics.</td>
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<tr>
<td>Competent Person</td>
<td>An individual in a Control of Work role who can demonstrate that they have professional or technical training, knowledge, actual experience, qualifications and ability to enable them to:</td>
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<tr>
<td></td>
<td>a. Perform duties at the level of responsibility allocated to them;</td>
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<td></td>
<td>b. Understand any potential hazards related to work (or equipment) under consideration;</td>
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<td>c. Recognise any technical defects or omissions in a task (or equipment) and the adverse implications for health and safety caused by the hazard(s) and / or omission(s); and</td>
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<tr>
<td></td>
<td>d. Be able to specify corrective action(s) to mitigate the hazards.</td>
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<tr>
<td>CoW</td>
<td>Control of Work</td>
</tr>
<tr>
<td>HITRA</td>
<td>Hazard Identification and Task Risk Assessment</td>
</tr>
<tr>
<td>OE</td>
<td>Operations Excellence</td>
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<tr>
<td>Permit</td>
<td>A formal and detailed agreed document that contains location, time, equipment to be worked on, hazard identification, mitigation / precaution measure(s) used and the names of those authorising the work and performing the work.</td>
</tr>
<tr>
<td>Single Point of Accountability (SPA)</td>
<td>The person in the organisation (site/Business Unit) who has been appointed as being responsible for the delivery and performance of a task.</td>
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</tbody>
</table>
Task Risk Assessment (TRA)  
A means of identifying work-related hazards, assessing the possibility of those hazards being realised, and defining the mitigating actions and controls required to reduce the risk.

4. Roles & Responsibilities

4.1. ANZ MS&L S&OR Engineering Authority

The ANZ MS&L S&OR Engineering Authority is responsible for:

a. Co-authorizing changes, with Agree rights, to the BP MS&L CoW process and associated procedures, including deviations to these procedures. *Note: EA authorization of deviations to CoW procedures is in addition to the requirements of PRO-4.1-0000-0-02 - MS&L Procedure Deviation management.*

b. Providing assurance to BP Group that ANZ MS&L is compliant with GDP4.5-0001 Control of Work;

c. Making decisions in areas of ambiguity and conflict while maintaining conformance to the GDP 4.5-0001 Control of Work and associated defined practices and procedures; and

d. Ensuring that lessons learned from external sources and from audits are assessed and incorporated in a review of the CoW systems if required.

4.2. GM Asset Management

The Single Point of Accountability (SPA) for the management of the Control of Work (CoW) process in the BP ANZ MS&L is the GM Asset Management. In their role as BP MS&L CoW SPA, the GM Asset Management is responsible for:

a. The overall process, performance and content of PRO4.5-0001-0-01 Control of Work and the associated defined practices and procedures;

b. Co-authorizing changes, with Decide rights, to the BP MS&L CoW process and associated procedures, including deviations to these procedures.

c. Confirming that there is a monitoring and self-verification program within BP ANZ MS&L CoW process and the associated procedures;

4.3. Control of Work Lead

The Control of Work Lead shall be competent to act as the Subject Matter Expert for the CoW system. The Control of Work Lead is responsible for:

a. Acting as the regionally based Subject Matter Expert for BP ANZ MS&L in GDP 4.5-0001;

b. Maintaining the ANZ MS&L procedures required to comply with GDP 4.5-0001.

c. Providing technical expertise to BP ANZ MS&L in regards to the successful application of Task Risk Assessments (TRA);

d. Continuously improving the BP ANZ MS&L CoW process.

e. Intervening and escalating as appropriate to the Engineering Authority (CoW SPA) when standards and / or procedural breaches are discovered.

4.4. Control of Work Assurance Advisor (Australia)

The CoW Assurance Advisor (Australia) is responsible for:
a. Supporting the CoW Lead in the implementation of GDP 4.5-0001 across the BP ANZ MS&L Australian business;
b. Supporting the ANZ MS&L procedures required to implement GDP 4.5-0001

4.5. **Control of Work Assurance Officer (New Zealand)**

The CoW Assurance Officer (NZ) is responsible within BP NZ for:

a. Supporting the CoW Lead in the implementation of GDP 4.5-0001 across BP NZ;
b. Supporting the ANZ MS&L procedures required to implement GDP 4.5-0001 in BP NZ;

4.6. **All personnel**

Everyone has an obligation to stop unsafe work or work that may result in loss of containment causing damage to the environment.

5. **Control of Work Policy**

BP ANZ MS&L is committed to providing so far as is reasonably practicable a working environment that is safe and without risk to health to all its employees, contractors and others. Whenever BP conducts construction, maintenance, demolition, remediation and other similar work that are typical of our industry, there is the potential for harm to people and the environment and for damage to equipment. An effective Control of Work process provides a work environment that allows tasks to be completed safely and without unplanned loss of containment with the potential to cause environmental damage or to damage a plant or equipment.

BP ANZ MS&L applies the 12 elements of Control of Work:

**Plan the work:**

a. Procedures exist describing the Control of Work process.
b. All identified roles within the Control of Work procedure have defined responsibilities.
c. All persons involved in the Control of Work process are appropriately trained and competent to carry out their roles.
d. Planning and scheduling of work identifies individual tasks and their interaction.

**Assess and manage the risk:**

e. All tasks are risk assessed.
f. Before conducting non-routine work that involves confined space entry, work on energy systems, ground disturbance, hot work in potentially explosive environments, or other potentially hazardous activities, a work permit (or work clearance) is obtained.
g. The scope, hazards, controls and mitigations are communicated in writing and signed off by all involved in the task.

**Control the work:**

h. All ongoing work requiring a permit is regularly monitored and managed by a responsible person.
i. The work site is left in a safe condition on completion or interruption of the work.

**Capture the learning:**
j. The Control of Work process is subject to a program of regular verification.

k. Internal and external lessons learned that impact the Control of Work process are captured, incorporated and shared.

Stop unsafe work:

l. Everyone has an obligation to stop unsafe work.

This policy applies equally to visitors, employees and contractors of BP regardless of their position, level or function.

6. Methodology

6.1. Training and Competency

Employees who are involved in the CoW process shall be trained and competent in the tasks they are performing, and meet the competency requirements for their assigned CoW roles.

6.1.1. CoW SPA

The Training Needs Analysis for the job role profile documents any further requirements for the Control of Work Single Point of Accountability.

6.1.2. CoW Lead

The CoW Lead acts as a SME for CoW in BP ANZ MS&L. They shall have undertaken BP ANZ MS&L Issuing Authority Training (face to face and online modules), or undertake such training within a year of commencing the role. The Training Needs Analysis for the job role profile documents any further requirements for this position.

6.1.3. CoW Assurance Advisor (and BP NZ CoW Assurance Officer)

The CoW Assurance Advisor (and BP NZ CoW Assurance Officer) shall have undertaken BP ANZ MS&L Issuing Authority Training (face to face and online modules), or undertake such training within a year of commencing the role. The Training Needs Analysis for the job role profile documents any further requirements for this position.

6.1.4. Issuing Authority

The training and competency levels of Issuing Authorities under the Permit to Work process are detailed in PRO 4.5-001-1-01 Permit to Work.

6.1.5. Performing Authority

Persons conducting work under the Control of Work processes shall be appropriately trained, qualified and competent in the tasks that they undertake and supervision of the work. The training and competency levels of Performing Authorities under the Permit to Work process are detailed in PRO 4.5-0001-1-01 Permit to Work.

Performing Authorities conducting works covered by the following procedures shall be competent to achieve full compliance with the following procedures to ensure the work risk is managed:

a. PRO-4.5-0001-1-02 Energy Isolation
b. PRO-4.5-0001-1-03 Ground Disturbance.
c. PRO-4.5-0001-1-04 Confined Space Entry.
d. PRO-4.5-0001-1-05 Working at Height.
e. PRO-4.5-0001-1-06 Lifting Operations.
f. PRO-4.5-0001-1-07 Hot Work

g. PRO-4.5-0001-1-08 Traffic Management

6.1.6. **Regional Issuing Authority Champion**

Each Regional Issuing Authority Champion shall be a currently accredited Issuing Authority or approved by the CoW Lead to fulfil this role based prior experience in the field.

6.2. **Planning and Scheduling**

Irrespective of whether the work is routine or non-routine, or whether it requires a work permit or work clearance, the person responsible for planning the work shall allow time for the following actions for the safe execution of the work:

- Define the scope of work;
- Identification of personnel and equipment required.
- Identification of dependent and linked work
- Identification of SIMOPS and their compatibility with the work
- Review associated procedures / Risk Assessments / JSA / SWMS;
- Define any Regulatory requirements;
- Inspection of the work site
- Conduct a risk assessment of the task
- Implementation of control measures including isolations
- Arrange resources for the work including the provision of the approval issuing authority if work is required to be undertaken under a work permit; and
- Coordinate and prioritise work to reduce conflict between tasks.

Subject Matter Experts (SMEs) may be included in the planning stages, as required by the technical complexity of the task(s).

6.3. **Task Based Risk Assessment**

All tasks shall be risk assessed. For routine works this forms part of the development of a risk assessed work instruction or procedure. For non-routine work this is part of the process documented in PRO-4.5-0001-1-01 Permit to Work.

6.4. **Permit to Work**

PRO-4.5-0001-1-01 Permit to Work defines the permit to work process including the complete definition of work permit requirements; authorisation and communication; monitoring and interruption of work; and work completion and close out.

Irrespective of whether the work requires a permit or not, the following procedures shall be complied with to ensure the work risk is managed:

- PRO-4.5-0001-1-02 Energy Isolation
- PRO-4.5-0001-1-03 Ground Disturbance.
- PRO-4.5-0001-1-04 Confined Space Entry.
d. PRO-4.5-0001-1-05 Working at Height.
e. PRO-4.5-0001-1-06 Lifting Operations.
f. PRO-4.5-0001-1-07 Hot Work
g. PRO-4.5-0001-1-08 Traffic Management

6.5. Lessons Learned
As part of the continuous improvement of the BP ANZ MS&L CoW processes, the findings of the Lessons Learned shall be incorporated into the following if necessary:

a. Procedures and Documentation; and
b. Control of Work communications.

All persons involved in the CoW process should take a proactive approach to the lessons learned process.

7. Associated Documents

<table>
<thead>
<tr>
<th>Document Number</th>
<th>Document Title</th>
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<tbody>
<tr>
<td>GDP 4.5-0001</td>
<td>Control of Work</td>
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<tr>
<td>PRO-4.5-0001-1-01</td>
<td>Permit to Work</td>
</tr>
<tr>
<td>PRO-4.5-0001-1-02</td>
<td>Energy Isolation</td>
</tr>
<tr>
<td>PRO-4.5-0001-1-03</td>
<td>Ground Disturbance</td>
</tr>
<tr>
<td>PRO-4.5-0001-1-04</td>
<td>Confined Space Entry</td>
</tr>
<tr>
<td>PRO-4.5-0001-1-05</td>
<td>Working at Height</td>
</tr>
<tr>
<td>PRO-4.5-0001-1-06</td>
<td>Lifting Operations</td>
</tr>
<tr>
<td>PRO-4.5-0001-1-07</td>
<td>Hot Work</td>
</tr>
<tr>
<td>PRO-4.5-0001-1-08</td>
<td>Traffic Management</td>
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8. Verification
The Control of Work system shall be subject of a self-verification program. This includes three components:

a. Level 1 – Entity Level.
   This management review is carried out in accordance with PRO-8.2-0001-0-01. This includes a review of the effectiveness of the site self-verification framework by checking at the entity level if the local system is fully implemented and applied systematically in conformance with BP and legal requirements. It also reviews whether the programme is producing the required outcomes.

b. Level 2 – System Level.
   This includes Program Review and Barrier Deep Dives in accordance with PRO-8.2-0001-0-01. It is a review of key procedures (including OMS4.5 Control of Work), processes and barriers to verify that they are being implemented as intended and evaluates the effectiveness of site procedures, processes and barriers. It includes focused activity that tests the strength of a sample of key barriers. These are carried out by the HSE team and
other Subject Matter Experts. Results from CoW Level 2 Verification activities are presented to the Operating Business and the Control of Work Lead; and then feed into the Entity Level Management Review.

c. Level 3 – Task Level.

This level provides a view of workforce safety behaviours on high risk tasks performed, and onsite verification of key risk controls.

i. Control of Work Desktop reviews:

Regular and adhoc reviews are conducted by the Control of Work team, or delegates to verify compliance and competence. In accordance with PRO4.5-0001-1-01 Permit to Work, all issuing Authorities, as a minimum, undergo a desktop review of a sample of permit sets every three years to maintain their authority. The Control of Work Lead is accountable for the program. Responsibility for delivery is delegated to the Control of Work Assurance Advisor (and BP NZ Control of Work Assurance Officer for New Zealand). Results feed into the Management Review.

ii. Field Inspections:

Field inspections are carried at work sites as part of a systematic program of self-verification in the field. These are checks carried out on site where the job is being performed. The purpose is to confirm compliance and competence, and to support the engagement of workers exhibiting the desired safety behaviours whilst work is being undertaken. The Field Inspection program is risk based with the tools and the activities targeted dependant on the level of competence of the verifier. The Control of Work Lead is accountable for the program. Results feed into the Entity Level Management Review.

9. External References

This Document was drafted with reference to relevant legislation at the date of drafting, including but not limited to, relevant Acts, Regulations, Australian Standards and industry codes and practices. Details of current legislation can be provided by the HSSE team on request.

10. Revision Summary

<table>
<thead>
<tr>
<th>Version</th>
<th>Prepared by</th>
<th>Description of Change</th>
<th>Date</th>
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<tbody>
<tr>
<td>1</td>
<td>Adrian Connolly</td>
<td>Initial</td>
<td>14/11/14</td>
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<tr>
<td>2</td>
<td>Adrian Connolly</td>
<td>Corrections to document formatting, spelling and grammar corrections, clarification of requirements, addition of CoW Assurance Office NZ responsibilities, and updates to align with new structure of ANZ MS&amp;L such as addition of responsibilities of GM Asset Management as the new CoW SPA. Move TRA Facilitator responsibilities into PRO4.5-0001-1-01 Permit to Work No actual change to CoW requirements for frontline personnel directly from updates to this particular procedure.</td>
<td>08/09/15</td>
</tr>
<tr>
<td>3</td>
<td>Adrian Connolly</td>
<td>Addition of CoW Policy into this Procedure. BP Group Regional CoW Advisor has advised that this is required and would otherwise be a likely Group Audit action. The policy had previously been retired on advice of ANZ MS&amp;L S&amp;OR EA and ED. Addition of Verification framework for CoW.</td>
<td>24/05/16</td>
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