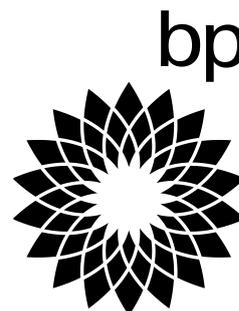




MS&L Procedure



PRO-4.5-0001-0-01

Control of Work Procedure

Document Owner:	Bill Kruesi	HSSE Manager - Asset Mgt
Approved By:	Bill Kruesi	HSSE Manager - Asset Mgt
Prepared By:	Adrian Connolly	Control of Work and Contractor Management Advisor
Document Status:	Approved	
Version Number:	5	
Approved Date:	06-Aug-2019	
Next Review Due By:	06-Aug-2024	

To review changes, refer to the ['Version Summary'](#) at the end of this document.

Copyright © 2019 BP p.l.c. All rights reserved.

This document and any data or information generated from its use, are classified, as a minimum, BP Internal. Distribution is intended for BP authorized recipients only. The information contained in this document is subject to the terms and conditions of the agreement or contract under which this document was supplied to the recipient's organisation. None of the information contained in this document shall be disclosed outside the recipient's own organisation, unless the terms of such agreement or contract expressly allow, or unless disclosure is required by law.

Contents

1.	Purpose	3
2.	Scope.....	3
3.	Terms, Definitions and Abbreviations	3
4.	Roles and Responsibilities	4
5.	Control of Work Policy.....	6
6.	Methodology.....	7
6.1.	Training and Competency	7
6.1.1.	CoW SPA	7
6.1.2.	Control of Work and Contractor Management Advisor	7
6.1.3.	BP NZ CoW HSSE Manager	7
6.1.4.	Permit Officer / Senior Permit Officer	7
6.1.5.	Permit Receiver	7
6.1.6.	Persons conducting work	7
6.2.	Planning and Scheduling	7
6.3.	Task Based Risk Assessment.....	8
6.4.	Work Authorisation	10
6.5.	Lessons Learned	10
7.	Verification	11
8.	Associated Documents.....	12
9.	External References.....	12
10.	Version Summary	13

List of Tables, Diagrams and Figures

Table 1:	Terms, Definitions and Abbreviations	3
Table 2:	Roles and Responsibilities.....	4
Figure 1:	ANZ TRA Risk Matrix.....	9
Table 3:	BP Australia MS&L Task Risk Assessment Approval Table.	10
Table 4:	Required References.....	12
Table 5:	Document Version Summary	13

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.

This procedure specifically details the requirements of the following documents:

- Group Defined Practice (GDP); [GDP 4.5-0001_2016 Control of Work](#)

2. Scope

The requirement specified in this procedure applies equally to BP employees, contractors and visitors engaged in the ANZ MS&L businesses.

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. Terms, Definitions and Abbreviations

Table 1: Terms, Definitions and Abbreviations

ANZ MS&L	Australia and New Zealand (ANZ) Marketing, Supply & Logistics (MS&L) business.
Competent Person	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: <ol style="list-style-type: none"> Perform duties at the level of responsibility allocated to them; Understand any potential hazards related to work (or equipment) under consideration; 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 Be able to specify corrective action(s) to mitigate the hazards.
CoW	Control of Work
HITRA	Hazard Identification and Task Risk Assessment
Permit	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.

Single Point of Accountability (SPA)	The person in the organisation (site/Business Unit) who has been appointed as being responsible for the delivery and performance of a task.
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 and Responsibilities

The roles and responsibilities associated with this procedure are listed in the following table.

Table 2: Roles and Responsibilities

ANZ MS&L S&OR Engineering Authority	<p>The ANZ MS&L S&OR Engineering Authority is responsible for:</p> <ul style="list-style-type: none"> 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.
HSSE Manager - Asset Management	<p>The Single Point of Accountability (SPA) for the management of the Control of Work (CoW) process in the BP ANZ MS&L is the HSSE Manager - Asset Management.</p> <p>In their role as BP MS&L CoW SPA, the HSSE Manager - Asset Management is responsible for:</p> <ul style="list-style-type: none"> 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 M,S&L CoW process and the associated procedures;

<p>Control of Work and Contractor Management Advisor</p>	<p>The Control of Work and Contractor Management Advisor shall be competent to act as the Subject Matter Expert for the CoW system. The Control of Work and Contractor Management Advisor is responsible for:</p> <ul style="list-style-type: none"> a) Acting as the regionally based Subject Matter Expert (SME) 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) Continuously improving the BP ANZ MS&L CoW process. d) Intervening and escalating as appropriate to the Engineering Authority (CoW SPA) when standards and / or procedural breaches are discovered.
<p>BP NZ HSSE Manager (New Zealand)</p>	<p>The BP HSSE Manager is responsible within BP NZ for:</p> <ul style="list-style-type: none"> 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; <p>These responsibilities may be delegated.</p>
<p>All personnel</p>	<p>Everyone has an obligation to stop unsafe work or work that may result in loss of containment causing damage to the environment.</p>

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. Control of Work and Contractor Management Advisor

The Control of Work and Contractor Management Advisor acts as a SME for CoW in BP ANZ MS&L. The Training Needs Analysis for the job role profile documents any further requirements for this position.

6.1.3. BP NZ CoW HSSE Manager

The Training Needs Analysis for the job role profile documents any further requirements for this position.

6.1.4. Permit Officer / Senior Permit Officer

The training and competency levels of Permit Officers & Senior Permit Officers under the Permit to Work process are detailed in WPCG-PRO-01 Work Authorisation.

6.1.5. Permit Receiver

The training and competency levels of Permit Officers & Senior Permit Officers under the Permit to Work process are detailed in WPCG-PRO-01 Work Authorisation.

6.1.6. Persons conducting work

Persons conducting work under the Control of Work processes shall be appropriately trained, qualified and competent in the tasks that they undertake.

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

- a) Define the scope of work;

- b) Identification of personnel and equipment required.
- c) Identification of dependent and linked work
- d) Identification of SIMOPS and their compatibility with the work
- e) Review associated procedures / Risk Assessments / JSA / SWMS;
- f) Define any Regulatory requirements;
- g) Inspection of the work site
- h) Conduct a risk assessment of the task
- i) Implementation of control measures including isolations
- j) 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
- k) 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 WPCG-PRO-01 Work Authorisation for BP Australia MS&L, and in PRO4.5-0001-1-01 Permit to Work for BP NZ and Air BP ANZ.

BP Task Risk Assessment requirements for Air BP ANZ and BP NZ are defined within PRO-4.5-0001-1-01 Permit to Work. In BP Australia MS&L, a BP Task Risk Assessment, facilitated by a BP HITRA trained facilitator, is required for all tasks required by WPCG PRO-01 to be authorised by a Senior Permit Officer and must be approved in accordance with [Table 3](#) below.

Figure 1: ANZ TRA Risk Matrix

		Probability				
		1	2	3	4	5
Impact Level		Remote possibility - A similar event has not yet occurred in our industry	Similar event has occurred somewhere in our industry and within the BP group	Likely to occur once or twice in lifetime of the facility	Event likely to occur several times in the lifetime of the facility	Common occurrence (at least annually) at the facility
Consequence	D	H	VH	VH	VH	VH
	E	L	M	H	VH	VH
	F	L	M	H	H	VH
	G	L	L	M	H	H
	H	L	L	M	M	H

Definitions for Risk Level Score

- L = Low Risk
- M = Medium Risk
- H = High Risk
- VH = Very High Risk & Not Allowed

Table 3: BP Australia MS&L Task Risk Assessment Approval Table.

Residual risk level	Minimum level of approval	Comments
VH – Very High	Not allowed	
H – High	General Manager – Asset Management	
M – Medium	WPCG Permit Officer	For work authorised by a WPCG Work Permit
	WPCG Work Clearance Issuer	For work authorised by a WPCG Work Clearance
L – Low	WPCG Permit Officer	For work authorised by a WPCG Work Permit
	WPCG Work Clearance Issuer	For work authorised by a WPCG Work Clearance

6.4. Work Authorisation

For BP Australia MS&L, WPCG-PRO-01 Work Authorisation defines the Work Authorisation process including the complete definition of Work Clearance and Work Permit requirements; authorisation and communication; monitoring and interruption of work; and work completion and close out. For Air BP ANZ and BP NZ this is defined in PRO-4.5-0001-1-01 Permit to Work.

Irrespective of whether a Work Clearance or Work Permit is required to authorise the work to commence, the following procedures shall be complied with 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

6.5. 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. Verification

The key process steps outlined in this Control of Work procedure are included in a Self-Verification Programme, this includes three components.

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.

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.

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.

a) 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 Work Authorisation, all Permit Officers, as a minimum, undergo a desktop review of a sample of permit sets every two years to maintain their authority.

b) 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 and Contractor Management Advisor is accountable for this program in Australia, and the BP NZ HSSE Manager is accountable in BP NZ. Results feed into the S Level Management Review.

8. Associated Documents

The following associated documents:

- Have been referenced in this procedure.
- Should be considered in understanding and applying the instructions provided in this procedure.

Table 4: Required References

Document Name	Document No	Document Location
Group Defined Practice - Control of Work	GDP-4.5-0001 2016	OMS Library
Work Authorisation	WPCG-PRO-01	WPCG website
Energy Isolation	PRO-4.5-0001-1-02	Controlled Document Register
Ground Disturbance	PRO-4.5-0001-1-03	Controlled Document Register
Confined Space Entry	PRO-4.5-0001-1-04	Controlled Document Register
Working at Height	PRO-4.5-0001-1-05	Controlled Document Register
Lifting Operations	PRO-4.5-0001-1-06	Controlled Document Register
Hot Work	PRO-4.5-0001-1-07	Controlled Document Register
Traffic Management	PRO-4.5-0001-1-08	Controlled Document Register
MS&L Self Verification Procedure	PRO-8.2-0001-0-01	Controlled Document Register

9. External References

This procedure was prepared with reference to relevant legislation/regulations including but not limited to, relevant Acts, Regulations, Australian Standards and industry codes and practices.

Details of current legislation/regulations can be provided by the HSSE Team on request.

10. Version Summary

The table below provides a summary of version history of this procedure.

Table 5: Document Version Summary

Version	Prepared by	Description of Change	Date	MoC
1	Adrian Connolly	Document created	14 Nov 2014	
2	Adrian Connolly	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&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.	08 Sep 2015	
3	Adrian Connolly	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&L S&OR EA and ED. Addition of Verification framework for CoW.	24 May 2016	11374
4	Adrian Connolly	Update for the implementation of WPCG-PRO-01 Work Authorisation	22 Aug 2018	11449
5	Adrian Connolly	Updated to correct HITRA 5x5 matrix	2 Jul 2019	11600

End of Document