



M&C-M Procedure



PRO-4.5-0001-0-01

Control of Work Procedure

Document Owner:	Janelle Shackley	HSE Manager – Midstream, Network Solutions & OMS
Approved By:	Janelle Shackley	HSE Manager – Midstream, Network Solutions & OMS
Prepared By:	Adrian Connolly	HSE Specialist – Control of Work and Contractor Management
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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 Control of Work

Relevant OMS element(s)

OMS 4.5 (Control of Work)

Contents

Purpose.....	1
Relevant OMS element(s)	1
1. Scope.....	3
2. Control of Work Policy.....	3
3. Methodology.....	4
3.1. Training and Competency	4
3.1.1. HSE Specialist - Control of Work and Contractor Management	4
3.1.2. Permit Officer / Senior Permit Officer	4
3.1.3. Permit Receiver	4
3.1.4. Persons conducting work	4
3.2. Planning and Scheduling	5
3.3. Task Risk Assessment.....	5
3.4. Work Authorisation	8
3.5. Life Saving Rules.....	8
3.6. Lessons Learned	10
4. Roles and Responsibilities	10
5. Terms, Definitions and Abbreviations	11
6. Verification Processes associate with this Procedure.....	11
7. Associated Documents	12
8. External References	12
9. Version Summary	13
10. Disclaimer.....	13

List of Tables, Diagrams and Figures

Table 1: BP Australia M&C-M Task Risk Assessment Approval Table.....	6
Figure 1: ANZ TRA Risk Matrix.....	7
Figure 2: bp adopted and endorsed IOGP Life Saving Rules.....	9
Table 2: Roles and Responsibilities.....	10
Table 3: Terms, Definitions and Abbreviations	11
Table 4: Required References.....	12
Table 5: Document Version Summary	13

1. Scope

The requirement specified in this procedure applies equally to BP employees, contractors and visitors engaged in the BP ANZ M&C-M 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.

2. Control of Work Policy

BP ANZ M&C-M 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 M&C-M 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, an authority to perform the work 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.

3. Methodology

3.1. 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.

3.1.1. HSE Specialist - Control of Work and Contractor Management

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

3.1.2. 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 (Australia) and PRO-4.5-0001-1-01 Permit to Work (New Zealand).

3.1.3. 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 (Australia) and PRO-4.5-0001-1-01 Permit to Work (New Zealand).

3.1.4. 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.

3.2. 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).

3.3. Task Risk Assessment

All tasks shall be risk assessed. For routine works this may form 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 in Australia, and in PRO4.5-0001-1-01 Permit to Work for NZ.

In New Zealand, the process for non-routine work is documented in PRO4.5-0001-1-01 Permit to Work. This includes the bp Task Risk Assessment and approval requirements.

In Australia, the process for non-routine work is documented in WPCG-PRO-01 Work Authorisation. In addition, 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. Approval requirements for these bp TRA's are defined in Table 3 below.

Table 1: BP Australia M&C-M Task Risk Assessment Approval Table

Residual risk level	Minimum level of approval	Comments
VH – Very High	Not allowed	
H – High	Senior Manager Network Solutions and Facilities Management	
	Airbp ANZ Technical and Operations Manager	* for airbp facilities
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

		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

Figure 1: ANZ TRA Risk Matrix

3.4. Work Authorisation

For BP Australia M&C-M, 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. In 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

3.5. Life Saving Rules

bp has adopted the Life Saving Rules (LSR) developed by the International Association of Oil and Gas Producers (IOGP), to help our employees and contractors instantly recognise and understand the rules that help keep us safe. The nine Life-Saving Rules are shown in Figure 2. These Rules focus on the activities which, through rigorous data analysis, have been shown to most likely result in fatalities. Each Rule consists of an icon and simple life-saving actions individuals can take to prevent a work related fatality.



LIFE-SAVING RULES










<p>Bypassing Safety Controls</p> <p>Obtain authorisation before overriding or disabling safety controls</p>  <ul style="list-style-type: none"> I understand and use safety-critical equipment and procedures which apply to my task I obtain authorisation before: <ul style="list-style-type: none"> disabling or overriding safety equipment deviating from procedures crossing a barrier 	<p>Confined Space</p> <p>Obtain authorisation before entering a confined space</p>  <ul style="list-style-type: none"> I confirm energy sources are isolated I confirm the atmosphere has been tested and is monitored I check and use my breathing apparatus when required I confirm there is an attendant standing by I confirm a rescue plan is in place I obtain authorisation to enter 	<p>Driving</p> <p>Follow safe driving rules</p>  <ul style="list-style-type: none"> I always wear a seatbelt I do not exceed the speed limit, and reduce my speed for road conditions I do not use phones or operate devices while driving I am fit, rested and fully alert while driving I follow journey management requirements
<p>Energy Isolation</p> <p>Verify isolation and zero energy before work begins</p>  <ul style="list-style-type: none"> I have identified all energy sources I confirm that hazardous energy sources have been isolated, locked and tagged I have checked there is zero energy and tested for residual or stored energy 	<p>Hot Work</p> <p>Control flammables and ignition sources</p>  <ul style="list-style-type: none"> I identify and control ignition sources Before starting any hot work: <ul style="list-style-type: none"> I confirm flammable material has been removed or isolated I obtain authorisation Before starting hot work in a hazardous area I confirm: <ul style="list-style-type: none"> a gas test has been completed gas will be monitored continually 	<p>Line of Fire</p> <p>Keep yourself and others out of the line of fire</p>  <ul style="list-style-type: none"> I position myself to avoid: <ul style="list-style-type: none"> moving objects vehicles pressure releases dropped objects I establish and obey barriers and exclusion zones I take action to secure loose objects and report potential dropped objects
<p>Safe Mechanical Lifting</p> <p>Plan lifting operations and control the area</p>  <ul style="list-style-type: none"> I confirm that the equipment and load have been inspected and are fit for purpose I only operate equipment that I am qualified to use I establish and obey barriers and exclusion zones I never walk under a suspended load 	<p>Work Authorisation</p> <p>Work with a valid permit when required</p>  <ul style="list-style-type: none"> I have confirmed if a permit is required I am authorised to perform the work I understand the permit I have confirmed that hazards are controlled and it is safe to start I stop and reassess if conditions change 	<p>Working at Height</p> <p>Protect yourself against a fall when working at height</p>  <ul style="list-style-type: none"> I inspect my fall protection equipment before use I secure tools and work materials to prevent dropped objects I tie off 100% to approved anchor points while outside a protected area

Figure 2: bp adopted and endorsed IOGP Life Saving Rules

3.6. Lessons Learned

As part of the continuous improvement of the BP ANZ M&C-M CoW processes, the findings of the Lessons Learned should be incorporated into the following if deemed 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.

4. Roles and Responsibilities

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

Table 2: Roles and Responsibilities

<p>HSE Manager – Midstream, NS & OMS Manager - Asset Management</p>	<p>The Single Point of Accountability (SPA) for the management of the Control of Work (CoW) process in the BP ANZ M&C-M is the HSE Manager - Midstream, NS & OMS.</p> <p>In their role as BP ANZ M&C-M CoW SPA, the HSSE Manager - Midstream, NS & OMS is responsible for:</p> <ul style="list-style-type: none"> • The overall process, performance, and content of PRO-4.5-0001-0-01 Control of Work and the associated defined practices and procedures. • Authorizing changes to the BP ANZ M&C-M CoW process and associated procedures, including deviations to these procedures. • Confirming that there is a monitoring and self-verification program within BP ANZ M,S&L CoW process and the associated procedures.
<p>HSE Specialist - Control of Work and Contractor Management</p>	<p>The HSE Specialist - Control of Work and Contractor Management shall be competent to act as the Subject Matter Expert for the CoW system. The HSE Specialist - Control of Work and Contractor Management is responsible for:</p> <ul style="list-style-type: none"> • Acting as the regionally based Subject Matter Expert (SME) for BP ANZ M&C-M in GDP 4.5-0001. • Maintaining the BP ANZ M&C-M procedures required to comply with GDP 4.5-0001. • Continuously improving the BP ANZ M&C-M CoW process. • Intervening and escalating as appropriate to the Engineering Authority (CoW SPA) when standards and / or procedural breaches are discovered.
<p>HSSE Specialist - Control of Work and Contractor Management (NZ)</p>	<p>The BP HSSE Manager is responsible within BP NZ for:</p> <ul style="list-style-type: none"> • Supporting the CoW Lead in the implementation of GDP 4.5-0001 across BP NZ. • Supporting the BP ANZ M&C-M procedures required to implement GDP 4.5-0001 in BP NZ.

All personnel	Everyone has an obligation to stop unsafe work or work that may result in loss of containment causing damage to the environment.
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5. Terms, Definitions and Abbreviations

Table 3: Terms, Definitions and Abbreviations

ANZ M&C-M	Australia and New Zealand (ANZ) Mobility & Convenience, and Midstream
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: <ul 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.

6. Verification Processes associate with this Procedure

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 ANZ MS&L Self Verification Procedure. This includes a review of the effectiveness of the site self-verification framework and whether the programme is producing the required outcomes.

Level 2 – System Level.

This review is carried out in accordance with PRO-8.2-0001-0-01 ANZ MS&L Self Verification Procedure. 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. These are carried out by the HSE team and other Subject Matter Experts. Results from CoW Level 2 Verification activities feed into the Entity Level Management Review.

Level 3 – Task Level.

This level provides a view of workplace safety on high-risk tasks performed.

a) Control of Work Desktop reviews:

Regular and ad-hoc reviews are conducted to verify compliance and competence.

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 either during work or after with the assistance of CCTV footage. 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. Results feed into the System Level Review.

7. 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
Group Defined Practice - Control of Work	GDP-4.5-0001
Work Authorisation	WPCG-PRO-01
Permit to Work	PRO-4.5-0001-1-01
Energy Isolation	PRO-4.5-0001-1-02
Ground Disturbance	PRO-4.5-0001-1-03
Confined Space Entry	PRO-4.5-0001-1-04
Working at Height	PRO-4.5-0001-1-05
Lifting Operations	PRO-4.5-0001-1-06
Hot Work	PRO-4.5-0001-1-07
Traffic Management	PRO-4.5-0001-1-08
ANZ MS&L Self Verification Procedure	PRO-8.2-0001-0-01

8. External References

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

9. 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 14	
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 BP ANZ M&C-M such as addition of responsibilities of GM Asset Management as the new CoW SPA. Move TRA Facilitator responsibilities into PRO-4.5-0001-1-01 Permit to Work No actual change to CoW requirements for frontline personnel directly from updates to this particular procedure.	08 Sep 15	
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 M&C-M S&OR EA and ED. Addition of Verification framework for CoW.	24 May 16	11374
4	Adrian Connolly	Update for the implementation of WPCG-PRO-01 Work Authorisation	22 Aug 18	11449
5	Adrian Connolly	Updated to correct HITRA 5x5 matrix	02 Jul 19	11600
6	Frazer Perry	Adjusted template to include most important information regarding document use and applicability at the front and moved reference sections to the end.	01 Jun 23	N/A
7	Adrian Connolly	Minor update post reinvent bp restructure to correct titles and business names plus some opportunities to simplify content were implemented. Inclusion of IOGP Life Saving Rules	31 Jul 2023	11836

10. Disclaimer

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