



# Safe TO Work in Trinidad & Tobago (STOW-TT)



## Administration Manual

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First Issued: 2007 June  
Revision No.: 3  
Date Revised : 8<sup>th</sup> Feb 2013

## Table of Contents

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Appreciation .....	iii
Introduction .....	1
Purpose .....	5
Main Components.....	7
The STOW-TT HSE Minimum Requirements .....	8
The Certification Tier System.....	10
Introduction .....	10
Overview.....	11
The Difference between Offshore Certification and Onshore Certification..	11
Assessing Work Risk Levels .....	13
No Certification Required.....	14
Low Risk Certification .....	14
High Risk Certification.....	15
The STOW Implementation Board .....	17
Composition of the STOW Implementation Board .....	19
The STOW-TT Project Implementation Unit .....	20
Introduction .....	20
Mission Statement .....	20
Role of the STOW-TT Project Implementation Unit .....	21
Responsibilities of the STOW-TT Project Implementation Unit.....	22
Independent Assessors .....	24
Introduction .....	24
Code of Ethics and Professional Conduct for Assessors .....	27
Enforcement of the Code of Ethics and Professional Conduct.....	30
Complaints.....	30
Investigating a Complaint.....	31
Decision .....	32
Appeals.....	32
Sanctions .....	33
Appendix 1 – STOW-TT Minimum HSE Requirements.....	35
Appendix 2 – Certification Levels Description .....	39
Glossary.....	41
Reference .....	42

## Appreciation

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The Energy Chamber of Trinidad & Tobago wishes to publicly express their appreciation to all individuals, organizations and governmental departments that have contributed to the successful development and implementation of the STOW-TT Minimum HSE Requirements system in the Energy Industry of Trinidad and Tobago.

Without mentioning individuals, special mentions of the organizations they represent are:

The Inter-American Development Bank (IADB), who through the Multi-lateral Investment Fund provided the support and majority of funding to allow the project to be developed and implemented.

The Government of the Republic of Trinidad and Tobago (GORTT), who through their Ministries, supported the work of the project.

The Point Lisas Energy Association (PLEA), who embraced the project, provided guidance to the project team and shared their lessons learnt from their own project development and implementation of the personnel competency passport system. Within this association, the work of the Health, Safety and Environment (HSE) Managers and the support of the CEOs proved vital to the project's success.

The Association of Upstream Operators of Trinidad and Tobago (AUOTT) supported the project wholeheartedly, developed the initial STOW-TT Minimum HSE Requirement statements and were instrumental in moving the project forward with pace. Within this Association, the HSE Managers and the support of the CEOs again proved vital to the project success.

The contracting companies associated with work in the energy sector have also been very supportive of the project's development and implementation.

# SECTION 1

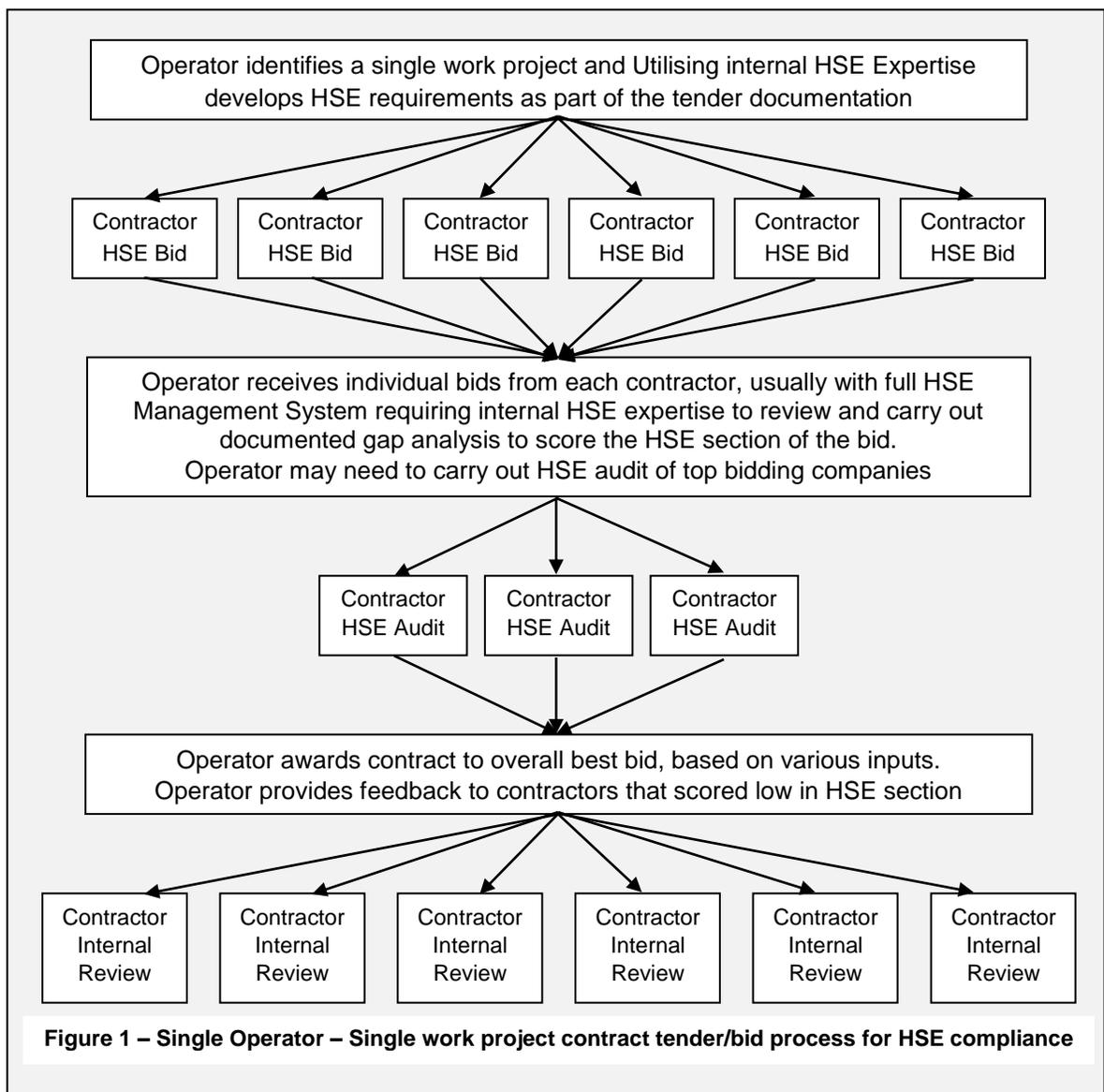
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## Introduction

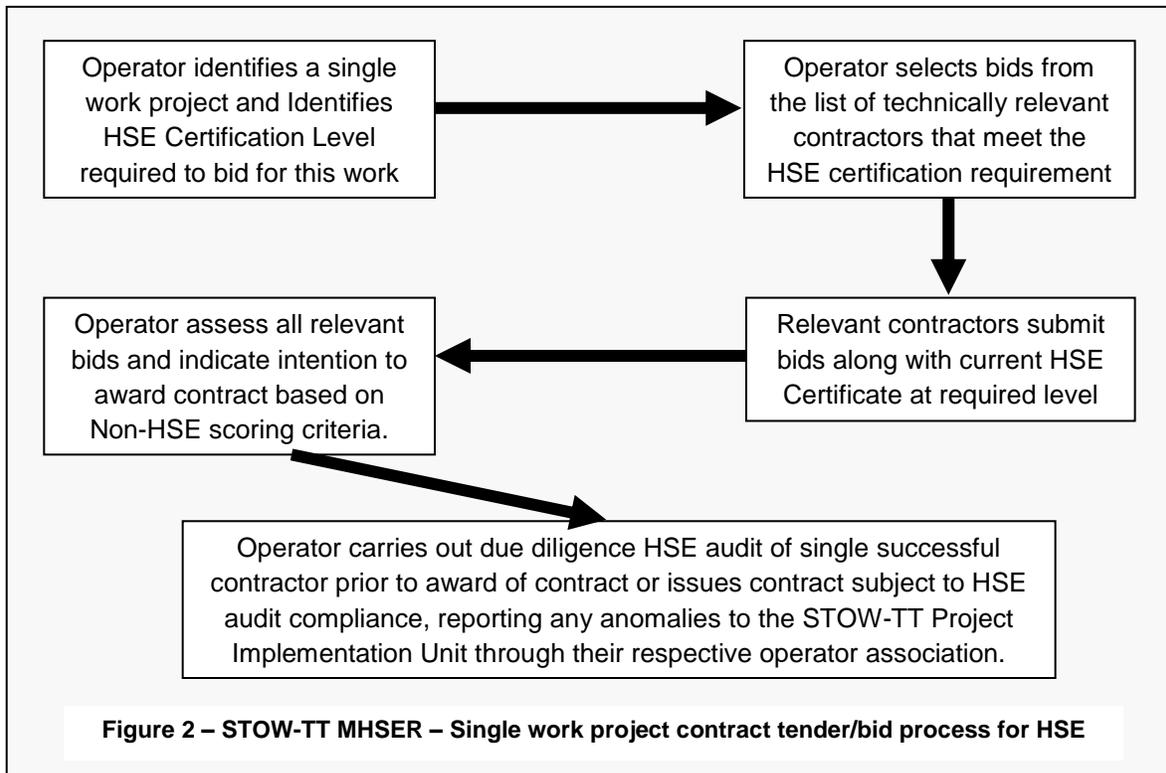
- 1.1 The energy industry of Trinidad and Tobago is primarily operated by very large national, multi-national or governmental organisations that utilise the services of contracting companies to meet the varied specialist areas needed to operate and maintain the facilities they own or control.
- 1.2 For many businesses owned locally, the energy industry is an extremely important industry to be involved in and the ability to provide services to the operating companies can be a determining factor in the success of the overall business.
- 1.3 The way in which the operating companies decide on the contracting companies that they wish to work with is generally standardised as a recognisable business process that involves the operating company compiling tender documents that identify the work scope and the minimum requirements to be met by the contractor that is successful in being awarded the contract.
- 1.4 The tender documents contain various sections that always detail the work scope but also include standard sections such as those that relate to the technical, financial, personnel and HSE requirements the operating company wishes to see in the company they award the contract to.
- 1.5 Businesses in Trinidad and Tobago have demonstrated their ability to respond to client needs and have placed great emphasis on meeting international standards applicable to their offered services. This includes quality control, operations excellence, personnel training, recognised financial modelling etc.
- 1.6 As the businesses in Trinidad responded to the identified needs of the operating companies, there has been a growing market for locally owned or operated companies within the energy sector where they have gained access to growing complexity of projects with inherently more operational risk potentials and this has led operating companies to become acutely aware of the HSE performance requirements needed to be met by the contractors they work with.
- 1.7 Prior to the acceptance of the “STOW-TT Minimum HSE Requirements” by the Energy Industry of Trinidad and Tobago, the variety of individual requirements set out by individual operating companies made it difficult, costly and time

consuming for contracting companies to be able to work with more than one or two operating companies at a time, simply because meeting one operating company's HSE compliance requirements, did not necessarily allow the contractor to meet the requirements of other operating companies.

1.8 Prior to the acceptance of the STOW-TT Minimum HSE Requirements by the operating companies, the process that was used to evaluate the HSE compliance of bidding contractors was time consuming for the skilled professional resources of both the operating company and the contractor companies.



- 1.9 Figure 1 sets out diagrammatically the broad process that was undertaken by individual operating companies in their review of the HSE compliance sections relating to the evaluation of bidding contractors wishing to work with their organization.
- 1.10 In considering Figure 1, it is important to remember that this process was being carried out by all of the operating companies, in both upstream and downstream sectors of the energy industry, for each piece of work they put out to tender.
- 1.11 There are over twenty operating companies in the Energy Industry in Trinidad and Tobago and they all draw from the same local pool of contracting companies, it is therefore obvious that while the workload on operating companies using this process was high, this burden was multiplied many times for the contracting companies.
- 1.12 The Energy Chamber of Trinidad & Tobago (ECTT) in listening to their members which comprise of both the operating companies and the majority of contracting or service companies that work in the energy sector, secured independent funding through the Inter-American Development Bank (IADB) to set up and work a more efficient method of carrying out the bidding process as it related to meeting the HSE requirements of the Energy Industry.
- 1.13 In setting up this process, the ECTT has developed the STOW-TT Minimum HSE Requirements that are agreed by both the upstream and downstream associations representing operators along with some additional acceptance by operators that are not members of the two main operating company associations.
- 1.14 The STOW-TT Minimum HSE Requirements Guidance Manual is a separate document that is widely available to provide detailed guidance on how the business community wishing to work with operating companies may demonstrate compliance with the STOW-TT Minimum HSE Requirements.
- 1.15 This Administration Manual, is designed to describe the various components that are needed in order to run the certification system and Figure 2 shows diagrammatically how the bid/tender process is intended to work following STOW-TT Minimum HSE Requirements certification.



1.16 This manual is set out in such a way that each of the main process components or groups are explained as to their structure and purpose but the detail of each component is described in the appropriate appendices.

# SECTION 2

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## Purpose

- 2.1 In developing and approving the STOW-TT Minimum HSE Requirements there have been numerous mis-interpretations of what the system is aimed at providing or what certification means.
- 2.2 The purpose of the STOW-TT Minimum HSE Requirements is nothing more and nothing less than a transparent communication by operating companies to all potential service providers of the minimum HSE requirements they are required to meet in order to be considered eligible to bid for work in the energy sector.
- 2.3 Where a service provider meets the STOW-TT Minimum HSE Requirements by certification from the approving body, they will not be excluded from bidding on a work project by reason of HSE compliance.
- 2.4 The HSE certification system does not mean that all STOW-TT Minimum HSE Requirements certified service providers will be allowed to bid for all work within their certification level. A service provider may be excluded from bidding for many reasons and some examples are:
  - a. The operator company may have past experience of the service provider that leads them to a desire not to work with the service provider.
  - b. The service provider may not have the technical expertise or relevant experience to carry out the work.
  - c. The service provider may not have the plant, equipment, personnel or financial resources to carry out the work.
- 2.5 An operating company may, at their own discretion, entertain and/or invite bids from service providers that are not certified under the STOW-TT Minimum HSE Requirements system at the time of the bid. The reasons they may do this include but are not limited to:
  - a. The invited service provider is known to the operator and has a long record of good HSE Management, but has not had time to go through the certification process.

- b. The invited service provider may not currently operate in Trinidad and Tobago, but their specialist skills, equipment, process and/or knowledge are needed urgently.
- c. The tender documents may be offered with a long lead time that will enable a realistic expectation that a non-certified or inadequately certified service provider will have time to become certified by the time the work is to be carried out.

2.6 Where a service provider is certified to the required level of STOW-TT Minimum HSE Requirements, the participating operating companies will not exclude that service provider from bidding on work where HSE compliance is offered as the reason for exclusion.

# SECTION 3

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## Main Components

- 3.1 There are five Main process components or groups that provide the organisational structure for the certifying process to be successful. They are:
- a. **The STOW-TT Minimum HSE Requirements:** These are the HSE Requirements that the participating operating companies have agreed are necessary to be addressed when service providers are to be considered eligible to bid on work in the energy industry.
  - b. **The Certification Tier System:** This is the system component that describes the level of risk that contracting companies are permitted to operate within.
  - c. **The STOW Implementation Board:** This board is the overall executive governance body that ensures the process is set up efficiently and is working as intended.
  - d. **The STOW-TT Project Implementation Unit:** This is a working body that carries out the day to day operations on behalf of the STOW Implementation Board
  - e. **The Independent Assessors:** These are individual, professionally qualified HSE specialists that are authorised to issue the Minimum HSE Requirement certification to contracting companies.

# SECTION 4

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## The STOW-TT HSE Minimum Requirements

- 4.1 The STOW-TT Minimum HSE Requirements are developed and approved under the authority of the STOW Implementation Board.
- 4.2 The purpose of the STOW-TT Minimum HSE Requirements is to provide transparent understanding of the HSE management system requirements that operating companies consider essential to be addressed.
- 4.3 The structure of the STOW-TT Minimum HSE Requirements is based on an expectation rather than prescription model.
- 4.4 The reason for an expectation model to be used is to allow for the diverse work scope and practices from an international industry to be catered for.
- 4.5 There are eleven elements headlined in the STOW-TT Minimum HSE Requirements and under each of these elements, there are a varied number of expectations on how the operating companies wish to see HSE management approached.
- 4.6 In an attempt to assist service providers that have limited or previously unstructured or undocumented approaches to the management of HSE within their organisations, the STOW Implementation Board has authorised a STOW Contractor Guidance Manual - HSE Minimum Pre-Qualification Requirements, which may be referenced by service providers to either carry out self assessment, self development or provide external advisors on the intent for their safety management system development.
- 4.7 Where a service provider has undertaken development of their safety management system with reference to internationally accredited safety management system models, it is likely that they will meet the STOW-TT Minimum HSE Requirements.
- 4.8 Examples of internationally accredited safety management systems that use non-prescriptive goal setting models include but are not limited to:
  - a. UK – HS(G)65 Successful Health and Safety Management.
  - b. UK – OSHAS 18001 (BSI)

- c. UK – BS 8800 (BSI)
- d. International - DNV – OHSMS
- e. Australia/New Zealand AS/NZ 4801
- f. Spain – UNE 81900
- g. USA API 9100

- 4.9 The STOW Implementation Board does not specifically endorse any one internationally recognised safety management system standard, they consider that all of the international accredited standards have technical integrity and it is for the organisations that use these models to ensure the applicability to their operations.
- 4.10 The level of compliance with the individual expectations will be used to assess the level of certification that a service provider will achieve.
- 4.11 The way in which the level of compliance will relate to the level of certification is under consideration at the time of this manual being printed and will be included as an amendment when it has been developed.
- 4.12 A copy of the eleven elements and all of the expectations (without guidance notes) can be found at appendix 1 of this manual.
- 4.13 The STOW Contractor Guidance Manual - HSE Minimum Pre-Qualification Requirements is a separate publication that provides all of the required elements, all of the required expectations and examples of how an organisation may meet the expectations.

# SECTION 5

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## The Certification Tier System

### 5.1 Introduction

- 5.1.1 This certification system adopted by the Energy Industry of Trinidad and Tobago is structured so as to recognise the variety of support operations that the energy industry requires to be provided for, do not all bring the same levels of risk to the overall operations.
- 5.1.2 The Certification System that is used in support of the STOW-TT Minimum HSE Requirements are approved and endorsed by the majority of Operating Companies that have operations in Trinidad and Tobago.
- 5.1.3 The Association of Upstream Operators of Trinidad and Tobago (AUOTT) represent the majority of operating companies that operate in the upstream sector of the energy industry in Trinidad and Tobago and they have approved this certification system.
- 5.1.4 The Point Lisas Energy Association (PLEA) represent the majority of operating companies that operate in the downstream sector of the energy industry in Trinidad and Tobago and they have approved this certification system.
- 5.1.5 The certification system does not cover the detail of the myriad of types of work carried out in support of the energy industry and operating companies in issuing bid documentation, will indicate the STOW-TT Minimum HSE Requirements Certification that is required for service providers to be eligible to bid on the service provision.
- 5.1.6 Certified service providers will be entered onto a database that is available to all the member operating companies and their commitment to the service providers is that they will ensure appropriate service providers that hold the required STOW-TT HSE certificate of compliance will be invited to bid for service provision work.
- 5.1.7 In explaining the term “appropriate service providers” the operators will include those service providers that have the apparent or potential technical ability, equipment, personnel, financial and other required capability to carry out the work in the bid process.

5.1.8 Stakeholders that have questions or identify opportunities for improvement of this certification system are encouraged to submit these to the STOW-TT Project Implementation Unit charged by the STOW Implementation Board to communicate, monitor and continually improve the certification system.

## **5.2 Overview**

5.2.1 The Certification System is constructed in three vertical layers with one horizontal split.

5.2.2 The horizontal split is simply provided to allow for differentiation in the specific requirements of the Offshore Energy Sector.

5.2.3 The vertical layers are built using an increasing level of compliance requirement and more robust HSE Management systems to give service providers access to work in increasingly higher risk areas of the energy industry operations.

5.2.4 Any service provider, of any size can apply to be certified at any level in either or both the offshore or onshore sectors of the energy industry.

5.2.5 Where a service provider is certified to a particular level onshore, the only requirement to be certified at the same level for offshore operations is that they meet the specific offshore minimum requirements for certification.

5.2.6 Certified service providers are required to maintain compliance with their certified level and they are required to undergo periodic re-certification to demonstrate this.

5.2.7 Within the certification system, where the risk to operations is considered very low, there is an option for operating companies to decide that no certification is required for the service provision being requested.

## **5.3 The Difference between Offshore Certification and Onshore Certification**

5.3.1 There are three defined areas of certification that differentiate the certified onshore service provider from the certified offshore service providers.

5.3.2 Given the remote nature of offshore locations and the extended tours of duty that service provider personnel are required to spend on location, the offshore sector of the industry require all employees to undergo fit to work medical

examination that meets the United Kingdom Offshore Operators Association (UKOOA) Medical Examination requirements.

- 5.3.3 The STOW Implementation Board does not solely accept the UKOOA Medical Examination Requirements and it is not required for service providers to demonstrate certified UKOOA Medical exams for their personnel, however where this is provided, the medical fitness for work will be accepted by the STOW Implementation Board.
- 5.3.4 The method of travel, and the inability to simply walk away from an emergency situation in offshore locations means that the offshore energy sector requires all personnel to undergo specific basic training in offshore safety and emergency procedures that are specific to the industry. This minimum requirement is accepted as being training that is approved for tropical climates by the Offshore Petroleum Industry Training Organisation (OPITO)
- 5.3.5 The third area of specific offshore minimum requirements are not applicable to all service providers, however they deal with the nature and method with dealing with emergencies offshore, which often involves the use of equipment or resources that are not necessarily seen in the onshore sector, or needed to be used by the general workforce onshore.
- 5.3.6 Certain service providers that work in the energy sector will be expected to provide personnel that are competent at using some of the emergency response resources that are not common to the onshore sector. Examples of these are:
  - a. Life Boat Handling.
  - b. Frog or Billy Pugh Operations.
  - c. Breathing Apparatus.
  - d. Helicopter firefighting equipment.
- 5.3.7 Linked with the competence of emergency response, some service providers may be required to provide personnel that have specialist skills in emergency response that are not required onshore. Examples of this include:
  - a. Personnel that have been trained to effectively manage and control Emergency Response in the Offshore Environments.
  - b. Fire fighting skills for sustained fire fighting roles.
  - c. Dynamic lifting skills.

d. Specialist Medical Skills at a more advanced level than those reasonably needed on all sites onshore.

5.3.8 Where a scope of work requires specialist or unusual skills relating to the HSE Management or emergency response on site, this will be clearly explained within bid documentation and it is foreseeable that failure to meet those requirements can result in an otherwise certified service provider being unsuccessful in being awarded the work they bid for.

## **5.4 Assessing Work Risk Levels**

5.4.1 The energy industry is an industry that can provide numerous examples of how major risk, resulting in multiple fatalities, major loss of facilities and major damage to the environment can be realised.

5.4.2 Globally, the loss of life in pursuit of industry activity is often measured in the hundreds per annum. Fatalities have occurred in every aspect of every operation regardless of apparent safety standards. Examples include:

a. Individual fatalities from being hit by moving or falling objects, falling from heights, contact with electrical power sources, entanglement with mechanical equipment, inhalation of toxic vapour etc.

b. Multiple fatalities through loss of stability, explosions, fire, catastrophic mechanical failure, road traffic collisions, aircraft malfunctions etc.

5.4.3 Within Trinidad and Tobago, the industry appears relatively safer than some other areas of the world, however fatalities still occur. Examples include:

a. Individual fatalities through falls from heights, contact with electrical power sources, being struck by moving objects etc.

b. Multiple fatalities are less frequent although they still have occurred, most memorably from inhalation of toxic vapours, explosions and road traffic accidents.

5.4.4 Within this context it is not alarmist to recognise that the potential for significant risk realisation is always present and the industry, globally and locally is renowned for continuously looking to reduce the frequency with which these risks may be realised.

5.4.5 In developing guiding notes on how potential service providers within the energy industry should be considered risk worthy, the operators have attempted to define work scope risk levels based on the potential for risk if the

service provider did not mitigate against realisation of the risk through proven systematic HSE management approaches.

- 5.4.6 Where the operator considers the work scope to have limited potential for significant harm to result from the work approach, they may accept the work may be undertaken by service providers that may be unable to demonstrate the highest levels of integrity in their HSE Management System development.
- 5.4.7 Even though this may be voluntarily accepted by the operator, this acceptance is based on an understanding that the service provider will demonstrate meeting the minimum legal requirements of the country that they operate in and that they will have in place a continuous improvement programme that will bring increasing integrity to their HSE management approaches.

## **5.5 No Certification Required**

- 5.5.1 An Operator may consider relevant low risk service provisions to bring such insignificant risk to their operations that the time and expense that potential service providers would have to undertake to become and maintain certification outweighs the need for certification under the STOW-TT Minimum HSE Requirements system.
- 5.5.2 Where the operator recognises this level of risk is applicable, all potential service providers will be required to submit an authorised self certification that states the service provider will, always conduct their operations in such a way as to enable identification, monitoring and maintenance of their processes so as to remain within the minimal applicable HSE related legal requirements of the country in which they conduct operations.
- 5.5.3 Limited examples of the type of service provision that may not require certification are provided in Appendix 2 of this manual.

## **5.6 Low Risk Certification**

- 5.6.1 Low risk operations are defined as those that the operator considers to present limited risk of injury, damage to equipment or damage to the environment.
- 5.6.2 In identifying the type of work that the operator will put into this class of certification, they will consider the following:
  - a. The type of injury or damage that could be caused by the work. This is likely to realistically remain within an occasional possibility of injury that may

require first aid treatment, where equipment damage is likely to be easily identifiable and remain below an acceptable financial level and where environmental impact is likely to be low and of temporary duration.

- b. The type and nature of work to be carried out. This is likely to be routine work that is simple in nature and requires a limited variety of skill sets or equipment to complete.
- c. The number of people that may be exposed to the risks associated with the work. This is likely to include the number of people carrying out the work and any personnel that may be affected by the work while it is carried out or could be affected once the work has been carried out.
- d. The time frame under which the risks from the work activity will be present. This is likely to consider the overall risk of an incident and balance that against the continued or aggregated time frame during which people will be at risk.

5.6.3 Limited examples of the type of work that may be included in the Low Risk Certification category are provided in appendix 2 of this manual.

## **5.7 High Risk Certification**

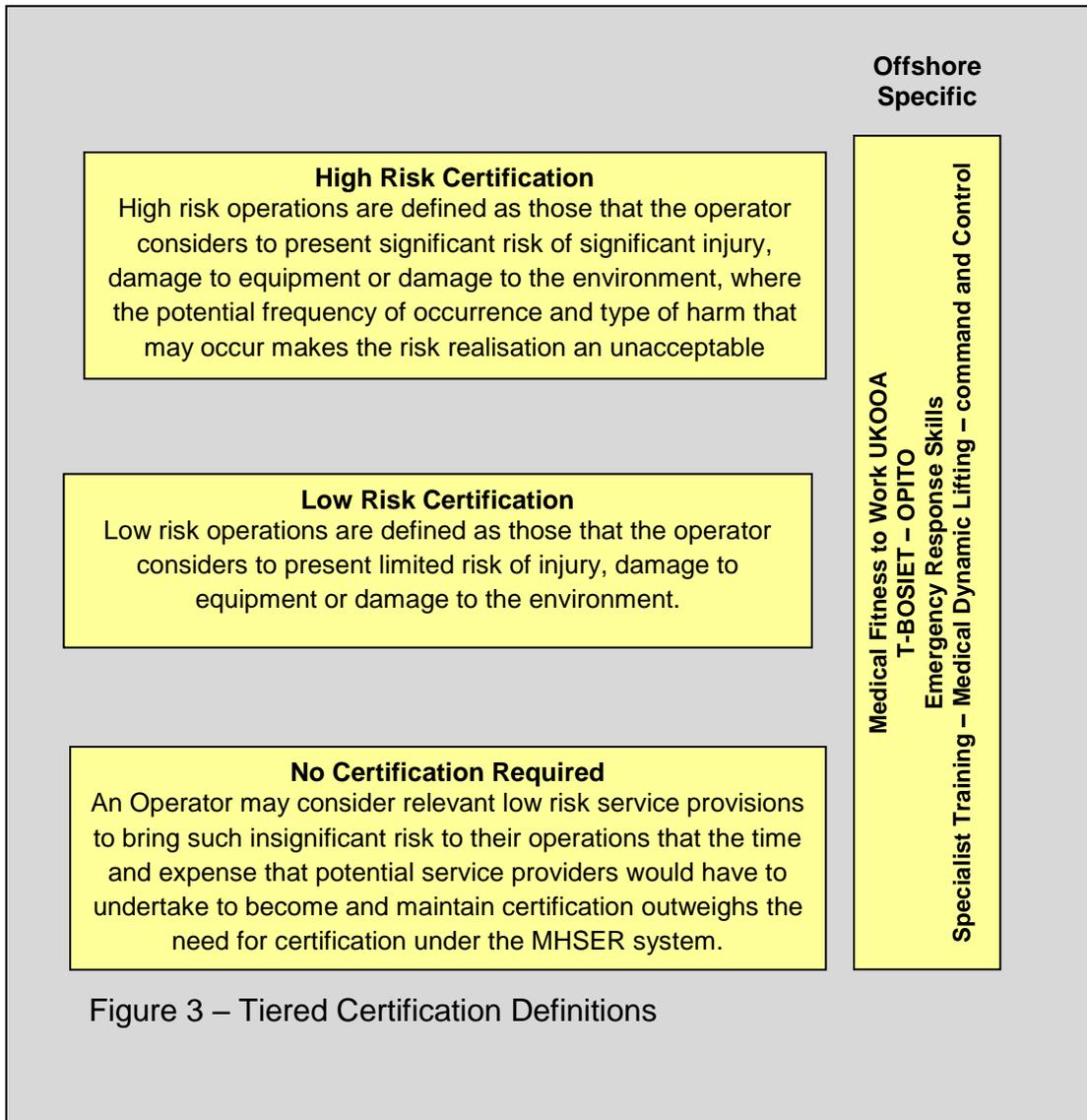
5.7.1 High risk operations are defined as those that the operator considers to present significant risk of significant injury, damage to equipment or damage to the environment, where the potential frequency of occurrence and type of harm that may occur makes the risk realisation an unacceptable concept.

5.7.2 The type of work is likely to include that which the operator knows has caused serious multiple injuries or extensive damage in the past and where they recognise the requirement to understand the integrity of the HSE management approaches used by any service provider will meet industry best practice.

5.7.3 The type of work that the operator will put into this class of certification will be all work not adequately fitting the risk descriptions at the lower levels.

5.7.4 Limited examples of the type of work that may be included in the High Risk Certification category are provided in appendix 2 of this manual.

5.8 **Figure 3** shows a diagrammatical view of the Tiered Certification Definitions.



# SECTION 6

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## The STOW Implementation Board

### Terms of Reference:

#### 6.1 Introduction

- 6.1.1 The STOW Implementation Board (STOW IB) has been established to allow the energy Operating Companies in both the upstream and downstream to: a) agree the minimum requirements they will use when procuring goods and services, and; b) communicate these to contractors, service companies and suppliers.
- 6.1.2 The role of the STOW IB is to govern the process by which the minimum requirements are set, communicated, implemented and assessed.

#### 6.2 Vision Statement

- 6.2.1 To raise the level of HSSE within the contractor and service provider work force of Trinidad and Tobago by working with key stake holders including regulatory agencies.

#### 6.3 Mission Statement

- 6.3.1 The Mission of the STOW IB is to establish minimum HSSE prequalification requirements for the signatory companies of the STOW Charter and put measures in place to ensure contractor/ service company compliance.
- 6.3.2 In support of this mission, the STOW IB is required to set up and maintain:
  - a. An efficient method for review and update of the agreed HSSE Requirements.
  - b. An effective process for certifying companies, sole traders and others who meet the HSSE Requirements.
  - c. An effective process for accrediting Independent Assessors (individual HSSE Professionals) to carry out certifying reviews on behalf of the STOW IB.
  - d. A monitoring, evaluation and reporting process that identifies gaps between the actual performance of certified companies or organisations and the expected HSSE performance, in accordance with the requirements.

- e. A monitoring, evaluation and reporting process that identifies gaps between actual performance of Independent Assessors and meeting the expected performance, in accordance with the accreditation requirements.
- f. Liaise with Ministry of Energy and Energy Industries (MOEEI), Occupational Safety & Health Agency (OHSA), Trinidad & Tobago Bureau of Standards (TTBS), Accreditation Council, National Training Agency (NTA) and other statutory agencies as appropriate.

## **6.4 Governance**

- 6.4.1 The STOW IB will be accountable to the Energy Chamber of Trinidad and Tobago, the Association of Upstream Operators of Trinidad & Tobago (AUOTT) and the Point Lisas Energy Association (PLEA).

## **6.5 Roles and Responsibilities of the STOW IB**

- 6.5.1 The STOW IB is:

1. The signing authority to any and all new, revised or revoked STOW HSSE Requirements that are incorporated into the STOW HSSE Guidelines.
2. The Governing Body for the STOW-TT Certification Unit which is the implementing agency for the STOW initiative.
3. Responsible for providing the Energy Industry Operating Companies with assurance that the STOW HSSE Requirements meet all of the legislative and corporate expectations of the companies.
4. Responsible for ensuring that the STOW HSSE Requirements are effectively approved and communicated to all service companies, contractors and suppliers.
5. Responsible for promoting and facilitating the improvement of HSSE performance in local businesses in the energy sector.
6. Responsible for providing public assurance that the process for certifying companies against the STOW HSSE Requirements is carried out in an unbiased manner that demonstrates integrity of the process.
7. Responsible for monitoring the performance of the STOW-TT Project Implementation Unit and reporting that performance to PLEA & AUOTT.
8. Responsible for reviewing the performance reports of Independent Assessors, conducted by the STOW-TT Project Implementation Unit.

9. Responsible for implementing a feedback process where concerns, improvements and lessons are addressed, relating to the functioning of the STOW-TT Project Implementation Unit and/or Independent Assessors.
10. Responsible for hearing and determining appeals from organisations or individuals concerning any aspect of the certification or accreditation process.
11. Responsible for ensuring that the work and progress of the STOW initiative is communicated to the energy industry, the wider private-sector, Governmental and non-governmental agencies.
12. Responsible for assuring the Energy Chamber, PLEA and AUOTT that the work of the board and the STOW-TT Project Implementation Unit is carried out in-line within the Chamber's financial guidelines.

## **6.6 Composition of the STOW Implementation Board**

- 6.6.1 The STOW Implementation Board is to be composed of not less than seven members including the Chairperson and not more than fifteen members where the overall composition will always be an odd number of members.
- 6.6.2 The two Operating Company organisations, PLEA and AUOTT, are required to appoint an even number of Members to the STOW Implementation Board.
- 6.6.3 The STOW Implementation Board is also to have at least one independent Member that is not directly aligned with the Operating Companies. This Member or Members allows the STOW Implementation Board to build links and raise profile outside the Energy Industry.
- 6.6.4 The independent member may come from industrial areas considered relevant by the board.
- 6.6.5 As the Board is formed, the initial independent member will be the CEO of the ECTT.
- 6.6.6 The number and source of the independent members for the STOW Implementation Board will be decided by the two Operating Company associations.
- 6.6.7 The method of appointment of persons to the STOW Implementation Board is considered a matter for the Operating Company Organisations, they must however be cognisant of the quality and qualifications of the people they appoint to serve on the STOW Implementation Board.

# SECTION 7

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## The STOW-TT Project Implementation Unit

### 7.1 Introduction

- 7.1.1 The STOW-TT Project Implementation Unit has been established as the single point of authority for authorizing suitable individuals as Independent Assessors to assess compliance with the STOW-TT Minimum HSE Requirements on behalf of the STOW Implementation Board.
- 7.1.2 The way in which the STOW-TT Project Implementation Unit is expected to operate does not require them to have specific technical expertise in the area of HSE Management Systems or processes.
- 7.1.3 The strength and validity of the STOW-TT Project Implementation Unit needs to be based on the integrity, and to some extent independence, with which they are able to undertake their role in support of the STOW Implementation Board.
- 7.1.4 The role of the STOW-TT Project Implementation Unit is to provide openness, clarity and integrity in the process for selecting and appointing individuals to be permitted to issue STOW-TT HSE Compliance Certificates to contracting companies or others that wish to provide services to Operating Companies in the Energy Sector of Trinidad and Tobago.
- 7.1.5 The initial location and administrative centre for the STOW-TT Project Implementation Unit will be under the working leadership of the ECTT with oversight being provided by the STOW Implementation Board.

### 7.2 Mission Statement

- 7.2.1 The Mission of the STOW-TT Project Implementation Unit is to provide the Energy Industry Operating Companies within Trinidad and Tobago with the assurance that any service provider that is issued with a certificate of STOW-TT Minimum HSE Requirements Compliance, at any level, has been issued that certificate by a demonstrably competent individual who has been properly investigated to determine the validity of their competence.

- 7.2.2 In support of this mission, the STOW-TT Project Implementation Unit is required to set up and maintain processes that:
- a. Provide a clearly defined and described set of criteria that need to be met in order for an individual to be deemed competent to assess STOW-TT Minimum HSE Requirements Compliance (Independent Assessor).
  - b. Enable timely review of all applications from individuals to be authorized as Independent Assessor.
  - c. Maintain an up to date register of all individuals that are authorized as Independent Assessors.
  - d. Monitors the performance of authorized Independent Assessors.
  - e. Provides a clearly defined and communicated disciplinary process for sanctioning Independent Assessors that do not uphold the clarity and integrity of the certification process.
  - f. Enables effective reporting to the STOW-TT Project Implementation Unit governing body/s
  - g. Manages prudently the finances of the STOW-TT Project Implementation Unit.
- 7.2.3 The STOW-TT Project Implementation Unit may not be involved in the Certification Process in any commercial way apart from the authorization and monitoring of Independent Assessors.

### **7.3 Role of the STOW-TT Project Implementation Unit**

- 7.3.1 The role of the STOW-TT Project Implementation Unit is to act as the approval centre for Independent Assessors to be authorized to carry out certification process work on behalf of the STOW Implementation Board.
- 7.3.2 In order to play this role effectively, there are several other roles that fall into the remit of the STOW-TT Project Implementation Unit. They are to act as:
- a. The communication centre between the STOW Implementation Board and the Independent Assessors with reference to any and all new, modified or repealed STOW-TT Minimum HSE Requirements that are to be amended in the STOW-TT Minimum HSE Guidelines.

- b. The monitoring centre for Independent Assessors to be assessed on performance.
- c. The advisory centre on all aspects of the authorizing of Independent Assessors and certification processes.
- d. The disciplinary board for Independent Assessors.
- e. The receiving centre for complaints against Independent Assessors and the certification process.
- f. A source of training and information for Independent Assessors.

#### **7.4 Responsibilities of the STOW-TT Project Implementation Unit**

- 7.4.1 The STOW -TT Project Implementation Unit is responsible for providing the STOW Implementation Board with assurance that the authorized Independent Assessors working on behalf of the STOW Implementation Board are properly qualified.
- 7.4.2 The STOW-TT Project Implementation Unit is responsible for ensuring that the up to date STOW-TT Minimum HSE Requirements for working in the Energy Industry of Trinidad and Tobago are effectively communicated to Independent Assessors and certified organisations.
- 7.4.3 The STOW-TT Project Implementation Unit is responsible for promoting and facilitating the authorization of local HSE Professionals.
- 7.4.4 The STOW-TT Project implementation Unit is responsible for providing public assurance that the process for authorizing Independent Assessors to work on behalf of the STOW Implementation Board is carried out in an unbiased manner that demonstrates integrity of the process.
- 7.4.5 The STOW-TT Project Implementation Unit is responsible for developing the:
  - a. Process for identifying and agreeing minimum qualifications for authorizing the Independent Assessors.
  - b. Monitoring system for reviewing performance of Independent Assessors.
  - c. Process for communicating the qualification requirements to all interested parties.
  - d. Disciplinary process for Independent Assessors.

- e. System for maintaining an up to date register of all authorized Independent Assessors.
  - f. System for maintaining an up to date register of all organisations that have been certified as meeting the STOW-TT Minimum HSE Requirements.
- 7.4.6 The STOW-TT Project Implementation Unit is responsible for meeting the reporting requirements of the STOW Implementation Board.
- 7.4.7 The STOW-TT Project Implementation Unit is responsible for identifying, sourcing and facilitating the training needs of Independent Assessors to meet the established qualification/s required to qualify as an Independent Assessor to work on behalf of the STOW Implementation Board.
- 7.4.8 The STOW-TT Project Implementation Unit is responsible for assuring the STOW Implementation Board that the work of the STOW-TT Project Implementation Unit is carried out in-line with financial guidelines agreed with the STOW Implementation Board.

# SECTION 8

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## Independent Assessors

### 8.1 Introduction

- 8.1.1 The Independent Assessors is an individual that, having demonstrated the necessary qualifications and experience to the STOW-TT Project Implementation Unit, is authorised to assess organisations' compliance with the STOW-TT Minimum HSE Requirements of the Energy Industry in Trinidad and Tobago on behalf of the STOW Implementation Board.
- 8.1.2 There are two levels of Independent Assessors to be established to reflect the level and experience of Independent Assessor.
- 8.1.3 The reason for two levels of Independent Assessor to exist is to enable the STOW-TT Project Implementation Unit to meet their mandate of promoting the authorization of local HSE Professionals to operate as Independent Assessors.
- 8.1.4 The first level of Independent Assessor is called "Independent Assessor" and the second level of Independent Assessor is called "Senior Independent Assessor".
- 8.1.5 The Independent Assessor is authorised to review HSE documentation submitted by organisations and to assess their ability to meet the lowest level of certification in the tiered certification system. This is the certificate issued to organisations involved in the lowest level of risk activity in the energy Industry.
- 8.1.6 The Independent Assessor is authorised to assess low risk organisations for certification.
- 8.1.7 The Independent Assessor may not assess service providers at the higher risk levels and make recommendations about their certification without the endorsement of a Senior Independent Assessor.
- 8.1.8 The Senior Independent Assessor has the same authorisation as the Independent Assessor, but in addition is authorised to review HSE documentation by organisations; visit and assess the organisation's implementation of the HSE processes submitted in the documented format; and recommend to the STOW Implementation Board whether or not a company should be issued a STOW-TT Minimum HSE Requirements Compliance

Certificate, at the appropriate level throughout the range of the tiered certification system.

8.1.9 The Senior Independent Assessor is also authorised to act in a “Supervisory” role for the Independent Assessor.

8.1.10 The minimum qualification for Independent Assessor to be authorized is:

a. Hold a professional HSE Qualification that is acceptable to the STOW-TT Project Implementation Unit that meets one of the following criteria:

i. A Certificate or Diploma issued by a bona-fide local education or established National Training Agency approved training establishment where:

A. More than eighty taught contact hours, focussed on all three aspects of Health, Safety and Environment Management.

B. The issuing of the Certificate or Diploma resulted from passing written exam/s.

C. The holder of the Certificate or Diploma can be verified, by the education establishment or the training agency as being a genuine holder of the certificate or diploma.

ii. An internationally recognised Certificate or Diploma issued by a suitably accredited organisation where:

A. More than eighty hours of taught contact hours, focussed on all three aspects of Health, Safety and Environment Management.

B. The issuing of the Certificate or Diploma resulted from passing written exam/s.

C. Where the holder of the Certificate or Diploma can be verified by the accrediting authority as being a genuine holder of the certificate or diploma. (Note verification from the training organisation will not be acceptable, unless that training organisation is the internationally recognised accrediting authority).

b. Examples of known local qualifications that meet these criteria are:

i. The Cipriani Labor College Diploma in Health, Safety and Environment.

ii. The University of the West Indies Diploma in Health, Safety and Environment.

- c. Examples of known international qualifications that meet these criteria are:
  - a. NEBOSH General Certificate. – UK Accrediting Authority
  - b. Associate Degree – US University
- d. In addition to the academic qualification held, the Independent Assessor must also be able to demonstrate that they have worked as an HSE Professional for at least two consecutive years immediately prior to making the application to the STOW-TT Project Implementation Unit.
- e. The Independent Assessor applicant must also sit and pass a written paper that is designed to enable them to demonstrate their understanding of the STOW-TT Minimum HSE Requirements and the audit process to a level acceptable to the STOW-TT Project Implementation Unit.

8.1.11 The minimum qualification for Senior Independent Assessor to be authorized is:

- a. The holder of a first degree, post graduate diploma, second degree from a bona-fide, recognised tertiary education authority or accredited authority that permits the holder to join an internationally recognised Health Safety and Environmental Professional Institution at a grade that recognises the Health, Safety and Environmental Professional.
- b. Examples of known qualifications that meet these criteria are:
  - i. BSc and MSc degrees in Occupational Health, Safety and Environment Management endorsed by Canadian, US, UK, Australian and European tertiary education establishments.
  - ii. Certified Safety Practitioner (Canada).
  - iii. Chartered Membership of IOSH (UK).
  - iv. National Register of Safety Practitioners (US).
- c. In addition to the academic qualification held, the Senior Independent Assessor must also be able to demonstrate that they have worked as an HSE Professional for at least five consecutive years immediately prior to making the application to the STOW-TT Project Implementation Unit.
- d. The Senior Independent Assessor applicant must also sit and pass a written paper that is designed to enable them to demonstrate their understanding of the STOW-TT Minimum HSE Requirements and the audit process to a level acceptable to the STOW-TT Project Implementation Unit.

- 8.1.12 In order for the STOW-TT Project Implementation Unit to assess the acceptability of an applicant to become an Independent Assessor for the STOW Implementation Board, the applicant must submit an application that indicates:
- a. The name, age, nationality, addresses and contact details of the applicant.
  - b. The level of Independent Assessor the application is being made.
  - c. The academic qualification claimed.
  - d. A copy of the award for the academic qualification claimed.
  - e. The name, address and contact details of the accrediting agency that issued the academic qualification.
  - f. Evidence of meeting the practical experience requirement for the level of Independent Assessor being applied for.
  - g. The name and contact details of suitable referees that may substantiate the validity of the practical experience claimed.
  - h. Four passport size and quality photographs of the applicant
  - i. A copy of two forms of picture identification documents.
  - j. The appropriate fee for making the application.

## **8.2 Code of Ethics and Professional Conduct for Assessors**

8.2.1 This Code of Ethics is to be observed by Assessors under the Safe TO Work in Trinidad & Tobago (STOW) initiative.

### **8.2.2 Standards**

1. I will serve my clients honestly, fairly, responsibly, competently and objectively.
2. I will adhere to high standards of professionalism in my decorum when carrying out assignments. I will avoid all conduct or practice that is likely to discredit Assessors or deceive clients, the STOW Project Office, the STOW Implementation Board or the general public.
3. I will refrain from corrupt practices including, but not be limited to (i) acts of bribery (ii) extortion or coercion (iii) fraud or (iv) collusion.

4. I will report to the STOW Project Office any corrupt practices by clients or other Assessors to gain certification including offers of gifts, bribe, acts of extortion, fraud or collusion.
5. I will establish in advance, mutual understanding of the objectives, scope, work plan and fee arrangements as well as the benefits and results of my services. In doing so, I will charge clients in accordance with the price range for Independent Assessors and Senior Independent Assessors set by the STOW Implementation Board. I will also refrain from overestimating the length of time to conduct any STOW related work.
6. I will adhere to the timeframe for STOW certification audits set by the STOW Implementation Board.
7. I will only accept assignments for which I possess the prerequisite experience and competence to perform.
8. I will honor professional commitments and terminate assignments only when fair and justifiable grounds exist.
9. Once I accept an assignment I will be available to my client at times mutually agreed upon.
10. I will not disclose or take advantage of any proprietary or confidential information relating to my assignments, including the Client's business or operations without the prior written consent of the Client.
11. I will avoid conflicts of interest or the appearance of such and will immediately declare to the client and the Project Office circumstances or interests that I believe may influence my judgment or objectivity.
12. I will offer to withdraw from an assignment when I believe my objectivity or integrity may be impaired.
13. I will not audit a client which I have assisted to implement the STOW Minimum HSE requirements.
14. If within the scope of my engagement, I will advise clients, employees and the STOW Project Office of danger and unacceptable risks to people, the environment or property.
15. I will not advertise my services in a deceptive manner.

16. I will not accept gifts of any kind from clients whom I am auditing for STOW certification
17. I will respect the rights of and will not slander other Assessors. I will issue public statements only in an objective and truthful manner and only when founded upon knowledge of the facts and competence in the subject matter.
18. I will act in a manner free of bias with regard to religion, ethnicity, gender, age, national origin, sexual orientation, disability or politics.
19. I will work for the advancement of health, safety and the environment and the STOW Initiative by sharing my knowledge.
20. If I perceive a violation of the Code, I will report it to the Project Office. I will promote adherence to the Code by other Assessors.
21. I will review this Code of Conduct regularly to ensure that I am in conformance with the Code.

I declare that I have read, understood and will uphold this Code of ethics.

I acknowledge that deviation from the code of ethics and professional conduct will lead to sanctions against me including the possibility of revocation of my authority to work as an Assessor under the Safe TO Work in Trinidad & Tobago (STOW) initiative.

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Name of Assessor  
(Block Letters)

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Signature

### **8.3 Enforcement of the Code of Ethics and Professional Conduct**

- 8.3.1 These procedures apply to Assessors authorized to work with the Safe TO Work in Trinidad & Tobago (STOW-TT) initiative.
- 8.3.2 The STOW Implementation Board (STOW IB) holds Assessors accountable to the STOW Code of Ethics and Professional Conduct and is intolerant of practices that threaten the integrity and reputation of the STOW IB and the STOW Initiative.
- 8.3.3 The STOW IB asks that any violations of the Code be reported to the Project Office. All allegations will be handled confidentiality and with due process. The Board will enforce the code by investigating complaints and by taking disciplinary action including possible revocation of authority to work with the STOW initiative, against any Assessor who is found guilty of a Code violation.

### **8.4 Complaints**

- 8.4.1 Ideally, a complaint against an Assessor must be forwarded in writing either by email or by regular mail, to the STOW Project Office. A complaint must include:
- the name, position, address, telephone number and signature of the author of the complaint
  - the actions that gave rise to the complaint
  - the dates of the alleged violation
- 8.4.2 Written complaints must be addressed to the Project Coordinator, Safe TO Work (STOW) Project Office, The Energy Chamber, Suite B2.03, Atlantic Plaza, Atlantic Avenue, Pt. Lisas or [natalie@energy.tt](mailto:natalie@energy.tt) or [keina@energy.tt](mailto:keina@energy.tt).
- 8.4.3 The STOW Project Office will acknowledge receipt of the complaint
- 8.4.4 By submitting a complaint, the complainant agrees that upon request of the STOW IB, he/ she will cooperate in the Code Enforcement process.
- 8.4.5 A complaint must be filed within 1 year of the date of the alleged violation.
- 8.4.6 The STOW IB will investigate all complaints (written or verbal) and other forms of misconduct by Assessors, that are brought to its attention.

## **8.5 Investigating a Complaint**

- 8.5.1 All complaints / allegations of misconduct will be handled by a sub-committee comprising a minimum of three (3) persons. At least 1 person on the sub-committee must be a member of the STOW IB.
- 8.5.2 If the sub-committee receives credible and undeniable proof that the Assessor is guilty of the infringement of the Code or of misconduct, the sub-committee will forward the proof to the STOW IB. In such an instance, the Board can immediately decide on the matter at the next STOW Board meeting and take action against the Assessor.
- 8.5.3 If the information provided by the complainant is not clear cut, the STOW Project Office will arrange a meeting between the Assessor and the sub-committee.
- 8.5.4 If at the meeting the Assessor requests time to respond to the complaint/ allegations, the sub-committee will give the Assessor a maximum of five (5) working days to respond in writing.
- 8.5.5 The sub-committee will take minutes of the meeting with the Assessor. These minutes and the written response of the Assessor (if any) will be tabled at the next STOW IB meeting.
- 8.5.6 The STOW IB will determine if a decision can be immediately taken on the matter or if the matter needs an in depth investigation.
- 8.5.7 If the STOW IB determines that it is warranted, an in depth investigation will be conducted by the sub-committee.
- 8.5.8 The sub-committee will take all steps to conduct a complete and unbiased investigation of the complaint which will include but is not limited to, interviews with the Assessor, complainant and witnesses, and review of submitted evidence.
- 8.5.9 For the investigation, the sub-committee will prepare and maintain notes of all meetings and interviews with the Assessor, the complainant and any witnesses. The sub-committee also may request any such person to sign a statement prepared on the basis of those notes.

- 8.5.10 If the Assessor refuses to co-operate, the sub-committee will prepare and maintain notes using available information from the complainant, witnesses and any information that the Assessor may have submitted.
- 8.5.11 Within one month (thirty days) of the STOW IB giving approval for an in depth investigation of the complaint/ alleged misconduct of the Assessor, the investigation shall be concluded and a written report of the sub-committee's findings will be submitted to the STOW IB and the STOW IB will take a decision on the matter. Each finding must be supported by reliable, credible and relevant evidence.
- 8.5.12 The STOW Project Office and/ or Board may conduct their activities in person, at meetings, via telephone conference call or through other secure and confidential means designed to ensure participation and deliberation by all members.

## **8.6 Decision**

- 8.6.1 The STOW IB will render a decision on a complaint/ alleged misconduct of an Assessor in writing, which will include a statement of the reasons for the decision. Only evidence that was put before the STOW IB may be considered as a basis for the decision.
- 8.6.2 The STOW IB's decision may be to:
- dismiss the case
  - adopt the findings and impose sanction(s)
- 8.6.3 A copy of the written decision of the STOW IB will be sent to the Assessor and the complainant will be informed of the decision in writing.

## **8.7 Appeals**

- 8.7.1 If sanctioned, the Assessor can appeal the decision of the STOW IB within 7 days of receiving the decision.
- 8.7.2 Appeals must be made in writing and clearly set out the grounds for the appeal which should be limited to:
- failure of the sub-committee or the STOW IB to follow these Enforcement Procedures
  - material errors of fact

- 8.7.3 Should the STOW IB decide by simple majority to grant the appeal, the Assessor will be informed of the decision
- 8.7.4 An Appeal Tribunal will be established comprising a minimum of three (3) CEOs. The individuals will be drawn from PLEA and AUOTT member companies.
- 8.7.5 The appeal shall be limited to a review of the written record. Only facts up to and including the initial decision will be considered.
- 8.7.6 The decision of the Appeal Tribunal is final. The Tribunal will either:-
- affirm the decision in full
  - modify the decision; or
  - reverse the decision, in which case any sanction imposed will be rescinded
- 8.7.7 The Tribunal's decision will be communicated to the complainant by letter, signed by the Chair of the Tribunal.
- 8.7.8 The complainant will also be informed of the final decision

## **8.8. Sanctions**

- 8.8.1 The following sanctions may be imposed upon an Assessor found to be in violation of the Code:
1. *Reprimand.* A reprimand is a formal rebuke by the STOW IB in writing addressed to the Assessor.
  2. *Suspension.* Suspension excludes the Assessor from working with the STOW initiative for a stated period of time and/or under stated conditions. The name of the Assessor will also be removed from the STOW website and the list of Assessors during the period of the suspension. Upon expiration of the suspension period, the Assessor will be eligible to return to work with the STOW initiative and his/ her name will be re-instated on the STOW website and the list of Assessors.
  3. *Revocation of authorization to work as Assessor.* Revocation bars the individual from working as an Assessor and is permanent. If an Assessor's authorization has been revoked, the PIU will inform the public

via the STOW website, the Energy Chamber's e-newsletter and hard copy newsletter etc.

- 8.8.2 In imposing disciplinary actions, the STOW IB will consider the severity of the violation, the intent of the Assessor, the extent of injury to other persons or the profession and whether the violation was willful or due to the Assessor's negligence. The STOW IB may in its discretion impose any disciplinary action, as warranted, in specific cases.
- 8.8.3 The Assessor will be suspended from working as an Assessor pending the outcome of the complaint.

## Appendix 1 – STOW-TT Minimum HSE Requirements

### **1 Element 1 - HSE Management, Leadership and Accountability**

- 1.1 Management endorses an HSEC Policy and Standards.
- 1.2 Managers are accountable for HSEC performance.
- 1.3 Resources are provided for the effective HSE implementation.
- 1.4 Managers demonstrate visible HSE leadership through personal example by frequent site inspections and reviews.
- 1.5 Management define specific and measurable HSEC activities to be included in performance plans.
- 1.6 The HSEC accountabilities of employees are identified and understood.
- 1.7 Systems are in place that recognise, reinforce and reward HSEC initiatives and desired outcomes.
- 1.8 Systems are in place to ensure that employees are aware of expected HSEC behaviours and consequences of inappropriate conduct.
- 1.9 Employees understand that they have the right and responsibility to stop work or refuse to work in unsafe conditions.
- 1.10 Bi-annually management principals and other key management participate in HSE Leadership forum with customers to agree expectations.
- 1.11 Management will have in place a contractor's assessment process that specifically addresses the suitability and integrity of their proposed contractors HSE Management system to perform work safely.

### **2 Element 2 – Legal Requirements and Document Control**

- 2.1 HSE Management system ensures conformance with legal requirements as a minimum.
- 2.2 Systems are in place to ensure that HSEC documents are established and documented.
- 2.3 Systems are in place to ensure that HSEC records are established, maintained and available.

### **3 Element 3 – Risk and Change Management**

- 3.1 HSEC risk management processes are applied to critical activity.
- 3.2 HSEC risk assessment process involves people with relevant knowledge and experience.
- 3.3 HSEC risks are recorded and maintained in a risk register and are reviewed and updated at least annually.
- 3.4 There shall be an appropriate Change Management Process in place to ensure:
  - a. Changes are properly assessed.
  - b. Ensures change does not introduce unacceptable new risk.
  - c. New risk is adequately identified and controlled.

### **4 Element 4 – Planning, Goals and Targets**

- 4.1 Systems are in place to ensure that HSEC is an integral part of business planning.
- 4.2 Company-wide measurable HSEC goals and targets are set and documented.
- 4.3 HSE Plan to consist of the following components:-
  - 4.3.1 Organizational Chart – Roles and Responsibilities
- 4.4 Procedures exist for job activities associated with services provided – these show how HSE will be managed inclusive of stopping unsafe work.
- 4.5 Resumes of all critical personnel (Managers, Supervisors, foremen, HSE advisors, specialists etc).
- 4.6 Method Statement (this should be tied directly to 6.3).

### **5 Element 5 - HSE COMPETENCY:**

Employers to provide evidence of training and familiarization as it applies to Safe Work Systems of Work key areas:-

- 5.1 Permit to work.
- 5.2 Risk Assessment – Job Safety Analysis.
- 5.3 Emergency Response.
- 5.4 Defensive Driving.

- 5.5 Accident prevention and reporting.
- 5.6 Environmental Awareness.
- 5.7 Hazardous Communication.
- 5.8 Personal Protective Equipment (PPE.)
- 5.9 New employee inductions.
- 5.10 Behavioural Based Safety training - Safety Training Observation Program (STOP), Advanced Safety Auditing (ASA) etc.
- 5.11 Tropical Basic Offshore Safety Induction & Emergency Training – (TBOSIET).
- 5.12 Safety Leadership or Safety Management training.

## **6 Element 6 - Security**

- 6.1 Organisational Data Base – employee address, photo, age, last place of employment.
- 6.2 Evidence of Background Character Check – (Character Check Register).
- 6.3 Equipment and Personnel Control Plan (Asset Specific).

## **7 Element 7 – Health and Hygiene**

- 7.1 A drug and alcohol policy.
- 7.2 Fit for work: United Kingdom Offshore Operators Association (UKOOA) Medical or equivalent.
- 7.3 Plan to protect employees from work related health hazards.
- 7.4 Employees have access to adequate medical and first aid services.

## **8 Element 8 – Environmental Management**

- 8.1 Environmental Policy.
- 8.2 Identity of significant environmental aspects.
- 8.3 Register of environmental legislative requirements.
- 8.4 Environmental Management Program including Emergency Response Plan (ERP).

- 8.5 Clearly defined roles and responsibilities to support Environmental Management System (EMS).
- 8.6 EMS documentation e.g. Policy, EMS manual, procedures.
- 8.7 Emergency Response Plans including drill schedule.
- 8.8 Annual auditing of the EMS.

**9 Element 9 – Incident Reporting and Investigation**

- 9.1 Systems for reporting, investigating, managing incidents.
- 9.2 Incident investigation processes for critical incidents.
- 9.3 STOP process for significant incident.

**10 Element 10 – Crisis and Emergency Management**

- 10.1 Systems for identification of emergency situations & consequences.
- 10.2 Response Plans are documented, accessible and communicated.
- 10.3 Resources required are identified, available and tested.
- 10.4 Staff are trained in and understand the emergency response plans.
- 10.5 Emergency response drills and exercises are conducted regularly.

**11 Element 11 – Monitoring, Audit and Review**

- 11.1 HSE performance is measured, monitored, recorded and analysed.
- 11.2 Work Sites conduct HSE inspections and audits.
- 11.3 Annual management reviews are conducted.
- 11.4 The HSE Policy and Standards are reviewed tri-yearly.

## Appendix 2 – Certification Levels Description

### **1 No Certification Required**

- 1.1 This is the category of certification that all service providers, regardless of the industrial areas they operate in are required to meet before they are permitted to work with any of the member operating companies.
- 1.2 Where no certification is required, the service provider is required to make an authorised self certification that states the service provider will, always conduct their operations in such a way as to enable identification, monitoring and maintenance of their processes so as to remain within the minimal applicable HSE related legal requirements of the country in which they conduct operations.
- 1.3 Limited examples of the type of service that may be provided by service providers without the need for certification are:
  - a. Routine delivery of non-hazardous materials or equipment from suppliers.
  - b. Suppliers based off site that simply maintain stock in order to service multiple clients including but not limited to those in the energy industry.
  - c. Simple domestic services that are considered to have very low or insignificant risk.
  - d. Occasional visitors, observers or consultants that introduce little or no risk to the work process.

### **2 Low Risk Certification**

- 2.1 Low risk operations are defined as those that the operator considers to present limited risk of injury, damage to equipment or damage to the environment.
- 2.2 Limited examples of the type of service that may be provided by service providers with Low Risk Certification are:
  - a. Service providers that only carry out their work in administration buildings or areas that are remote from plant and equipment and where that work has no direct impact on hydrocarbon process plant or facilities.
  - b. Simple landscape gardening and grounds maintenance in non-hazardous areas that does not involve digging, trenching or excavating more than twelve inches below ground level.

- c. Maintenance activities that do not involve a need to isolate electrical or mechanical powered equipment and where the work is always carried out less by a workforce that is not required to have their feet more than five feet above ground level.
- d. Routine work in warehouse areas located outside designated hazardous areas.

### **3 High Risk Certification**

- 3.1 High risk operations are defined as those that the operator considers to present significant risk of significant injury, damage to equipment or damage to the environment, where the potential frequency of occurrence and type of harm that may occur makes the risk realisation an unacceptable concept.
- 3.2 Limited examples of the type of service that may be provided by service providers with High Risk Certification are:
  - a. Services that require electrical isolation and may include re-routing or installation of electric supply cables up to and including three phase, 440v power lines.
  - b. Lifting operations that are carried out by fixed or mobile lifting equipment, including marine vessel loading or unloading and including operations in hazardous zones.
  - c. Drilling Contractor Services.
  - d. Refinery maintenance services.
  - e. Plant and equipment maintenance services.
  - f. Pipeline construction and repair services.
  - g. Electrical power plant installation and maintenance services.
  - h. Aircraft operator services.

## Glossary

ASA	Advanced Safety Auditing
AUOTT	Association of Upstream Operators of Trinidad & Tobago
T-BOSIET	Tropical Basic Offshore Safety Induction & Emergency Training
EMS	Environmental Management System
ERP	Emergency Response Plan
GRTT	Government of the Republic of Trinidad and Tobago
HSE	Health Safety & Environment
IADB	Inter-American Development Bank
OCAM	Operating Company Association Member
OPITO	Offshore Petroleum Industry Training Organization
PLEA	Point Lisas Energy Association
PPE	Personal Protective Equipment
ECTT	Energy Chamber of Trinidad & Tobago
STOP	Safety Training Observation Program
UKOOA	United Kingdom Offshore Operators Association

## Reference

**Safety Training Observation Program (STOP)**

<http://www.dupontsafetyrevealed.org/DupontSTOP/STOP2.htm>

**Tropical Basic Offshore Safety Induction and Emergency Training**

[http://www.opito.com/library/emergency\\_response\\_training/tropical\\_bosietfoet.pdf](http://www.opito.com/library/emergency_response_training/tropical_bosietfoet.pdf)

**Trinidad and Tobago Environmental Management Act, 2000**

[www.ttenvironmentalcommission.org/legislation.htm](http://www.ttenvironmentalcommission.org/legislation.htm)

**The Occupational Safety and Health Act, 2004**

<http://www.ttparliament.org/bills/acts/2004/a2004-01.pdf>

**The Occupational Safety and Health (Amendment) Act. 2006**

<http://www.ttparliament.org/bills/acts/2006/a2006-03.pdf>

**United Kingdom of Offshore Operators Association (UKOOA)**

<http://www.ukooa.co.uk/ukooa/index.cfm>

**Qualified Doctors registered in Trinidad & Tobago**

<http://www.ukooa.co.uk/issues/health/doctors-list.cfm>

**The Petroleum (Amendment) Act, 2000**

<http://www.ttparliament.org/bills/acts/2000/a2000-79.pdf>