



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



Contractor Guidance Manual Health, Safety and Environmental (HSE) Minimum Prequalification Requirements

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Definitions

Audit:	Systematic, independent and documented process for obtaining evidence and evaluating it objectively to verify that the actual practices and procedures of a company complies with documented systems and are in accordance with the STOW-TT HSE Minimum Requirements.
Competence:	Having the required knowledge, training and experience to fulfill assigned work tasks and also understanding their limitations.
Critical Activity:	A process which if conducted outside expected parameters has the potential to result in a major accident event.
Expert/ Specialist:	Person with extensive knowledge or ability in a particular area of study.
Health, Safety & Environmental Policy:	A fundamental component of an organisation's HSE Management System it is the overall control document and vehicle for communication comprising: - of a statement of intent, organisational means for implementation, the arrangements made for HSE in the workplace; and arrangements for assessing and recording significant risks.
Health, Safety & Environmental Policy Statement:	An effective written declaration, demonstrating management philosophy and commitment to Health and Safety.
Independent Assessor	An individual, having demonstrated appropriate knowledge, training and experience, appointed by the STOW Implementation Board to carry out evaluation and certification work on behalf of the STOW Implementation Board
Shall:	"Shall" denotes the minimum requirement in order to conform to the STOW-TT HSE Minimum Requirements

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SAFE TO WORK IN TRINIDAD & TOBAGO (STOW-TT)

CHARTER 2013

As leaders, we are committed to working with our service providers to promote health, safety and environmental (HSE) performance in the energy industry.

In 2010 our companies recognized that the proliferation of HSE prequalification requirements within the energy sector had created challenges for service providers, and so we agreed to adopt consistent HSE requirements to facilitate the prequalification of service contractors seeking work among our member companies through signing an original STOW Charter.

In 2013 we now re-commit ourselves to the original objectives of STOW and further agree that we will continue:

- To mutually support and individually commit to honor the STOW HSE certification as meeting our individual HSE pre-qualification requirements in the contractor/vendor review exercise.
- To recognize service providers certified to the STOW Minimum HSE Requirements as demonstrating commitment to HSE acceptable standards.
- To allow, as far as reasonable, STOW certified service providers to submit only their STOW certificate rather than extensive HSE documentation when prequalifying for work with member companies.
- To avoid excluding a service provider from prequalifying for work where HSE compliance is offered as the reason for exclusion, if the service provider is STOW certified at the required level of risk.
- To support the STOW independent certification system as an efficient tool for evaluating the HSE performance of service providers in an objective manner by uniform assessments conducted by Independent Assessors using a standard protocol.
- To recognize the STOW Implementation Board, operating under the mandate of the Energy Chamber and with representatives from a cross section of our companies as the body that governs the process by which the STOW Minimum HSE Requirements are set, communicated, implemented and evaluated.
- To accept the rights of member companies to conduct their own HSE assessment or request further information from companies before awarding a contract.
- To continuously improve the STOW programme through dialogue, consultation and feedback.

We further commit ourselves:

- To agree that the 31st December 2013 will be the cut-off date after which STOW certification will become mandatory for all service providers competing for business within Trinidad & Tobago and providing services categorized as high risk.
- To putting in place all internal procedures and systems to fully implement these commitments.
- To make suitably qualified members of our staff available to ensure the smooth operation of the STOW Implementation Board and its sub-committees, in particular to ensure the timely review of recommendations for certification made by Independent Assessors.
- To work together to set a suitable deadline for low risk contractors.
- To recognize the rights of member companies to set and enforce earlier deadlines, including deadlines for low risk contractors.
- To recognize the particular challenges facing some member companies, given their historical experience and business realities, and to respect the fact that additional time may be required for them to fully implement their commitments under this Charter.

Charter signed by

- Atlantic
- BG Trinidad & Tobago
- BHP Billiton Trinidad & Tobago
- bpTT
- Centrica Energy
- Chevron Trinidad and Tobago Resources SRL
- EOG Resources Trinidad Limited
- Industrial Plant Services Limited
- Methanex Trinidad Limited
- Methanol Holdings (Trinidad) Limited
- National Energy Corporation of Trinidad & Tobago
- Nu-Iron Unlimited Trinidad & Tobago
- PCS Nitrogen Trinidad Limited
- Petrotrin
- Phoenix Park Gas Processors Limited
- Pt. Lisas Nitrogen Limited
- Power Generation Company of Trinidad & Tobago Limited
- Repsol E&P Trinidad & Tobago Limited
- Trinity Exploration and Production Limited
- Trinity Power Limited
- Yara Trinidad Limited

Appreciation

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

Introduction

1. This guidance manual has been developed to provide stakeholders in the Energy Industry of Trinidad and Tobago with advice and guidance on the type of approach to managing the HSE aspects of their business that will assist them to meet the STOW-TT Minimum HSE Requirements for pre-qualification to bid on work in their relevant business or service areas.
2. The STOW-TT Minimum HSE Requirements are approved and endorsed by the majority of Operating Companies that have operations in Trinidad and Tobago.
3. AUOTT represents the majority of operating companies that operate in the upstream sector of the energy industry in Trinidad and Tobago and they have approved both the STOW-TT Minimum HSE Requirements and these guidelines.
4. PLEA represents the majority of operating companies that operate in the downstream sector of the energy industry in Trinidad and Tobago and they have approved both the STOW-TT Minimum HSE Requirements and these guidelines.
 - 4.1 The guidelines do not provide comprehensive or definitive approaches to HSE Management that are absolutely required and stakeholders may meet the STOW-TT Minimum HSE Requirements in ways other than those described in the guidelines.
 - 4.2 In applying for certification for meeting these STOW-TT Minimum HSE Requirements, it is intended that these guidelines will provide applicants with a clearer understanding of the level they may be certified at by having reference to these guidelines.
5. Stakeholders that have questions or identify opportunities for improvement of these guidelines are encouraged to submit these to the STOW Implementation Board who are charged by the AUOTT and PLEA to communicate, monitor and continually improve the STOW-TT Minimum HSE Requirements.

SECTION 2

How to Use This Manual

1. Section three of the manual provides an overview of the meaning and status of the STOW-TT Minimum HSE Requirements.
2. Section four provides an overview of the certification process, explains how the process operates and how to initiate evaluation leading to certification.
3. Section five defines each of the STOW-TT Minimum HSE Requirements that are agreed with the AUOTT and PLEA. They are approved and controlled by the STOW Implementation Board.
4. Section six provides the detailed guidance on how organizations may demonstrate their compliance with the STOW-TT Minimum HSE Requirements.

SECTION 3

The Meaning of the STOW-TT Minimum HSE Requirements

1. The STOW-TT Minimum HSE Requirements are agreed by the AUOTT and PLEA.
2. Together, these two operating company Associations represent the majority of operating companies that have commercial operations in Trinidad and Tobago.
3. The STOW Implementation Board has been established and comprises representatives of AUOTT, PLEA and The Energy Chamber.
4. The STOW Implementation Board has agreed that any service provider that is certified to the relevant level of compliance for these STOW-TT Minimum HSE Requirements will not be excluded from bidding for work in their relevant area of service provision where that exclusion is linked to HSE requirements for the work.
5. An operator may exclude a service provider that is certified to the right level from bidding on relevant work, by reason of past performance with the service provider, or through lack of faith in technical ability etc.
6. The purpose and meaning of the STOW-TT Minimum HSE Requirements are that service providers will be able to pre-qualify the validity of their documented HSE Management systems with STOW Implementation Board member operating companies without having to submit full supporting documentation to each operating company each time they bid for work.
7. Where a service provider is successful in their overall commercial bid to provide a service, and the operating company indicates an intent to award the service provision contract to the service provider, there is nothing in the certification process that protects or indicates that the service provider will not be required to pass contract qualification audit processes that may be required by individual operating company members of the STOW Implementation Board.
8. An additional purpose of compliance with the STOW-TT Minimum HSE Requirements, is that individual operating company members of the STOW Implementation Board should be afforded more time and be able to allocate their HSE resources more usefully, to carry out contract award qualification processes resulting in higher levels of integrity and assurance of that process.
9. Certified service providers will be required to maintain their certification and undergo re-certification processes as frequently as the STOW Implementation Board may require.

SECTION 4

The Certification Process

- 1. Any service provider, large or small may apply to undergo evaluation for certification of compliance with the approved STOW-TT Minimum HSE Requirements.
- 2. There is no pre-requisite for applicant service providers to demonstrate experience or current operations in energy industry activity.
- 3. Where experience of the energy industry activity is required, that will be identified in operating company bid documentation in sections that are not linked to HSE performance.
- 4. The application will be made to the STOW-TT Project Office.

5. The only requirements are:

5.1 The applicant must prove they are a bona-fide registered legal entity, licensed to commercially operate in Trinidad and Tobago. (Normally this will be a locally registered company).

5.2 Submit payment of the appropriate application fee as follows:

VAT (Excl.)	Chamber Members (\$TT)	Non Members (\$TT)
Low Risk	\$1,000.00	\$1,250.00
High Risk	\$3,000.00	\$3,750.00

- 6. Having submitted a valid application to undergo evaluation for certification of compliance with the STOW-TT Minimum HSE Requirements, the STOW-TT Project Office will provide the name of the next available Independent Assessor and contact details to the applicant.
 - 6.1 The “Independent Assessor” is an individual, having demonstrated appropriate knowledge, training and experience, is appointed by the STOW Implementation Board to carry out evaluation and certification work on behalf of the STOW Implementation Board.

6.2 There are two levels of Independent Assessor – Independent Assessor and Senior Independent Assessor. The Independent Assessor is only authorized to audit applicants at the lowest level of certification, while the

Senior Independent Assessor is permitted to audit applicants at all levels of certification.

7. The applicant will contract the Assessor to carry out the certification process. A standard contract will be used by the Assessor. The rates for an Assessor are as follows:-

	\$TT/day
Senior Independent Assessor	\$2,500.00 - \$3,000.00
Independent Assessor	\$1,500.00 - \$2,000.00

8. A full audit is expected to take **no more than 5 days** including the writing of the report.
9. The initial step in the certification process is for the Independent Assessor to audit the applicant's HSE Management system documentation in order to identify if the applicant meets the required documentary standard.
10. The initial documentary review may take place remotely from the applicant's place of business or work sites.
11. Where the Independent Assessor finds the provided HSE documentation fails to meet the STOW-TT Minimum HSE Requirements for any level of certification, or for the level of certification the applicant has contracted the Independent Assessor to process, they are required to submit a documented report to the STOW-TT Project Office explaining why the HSE documentation fails to meet the STOW-TT Minimum HSE Requirement, or the level of certification the applicant has identified they wish to be certified to.
 - 11.1 If the applicant feels the assessment has been carried out incorrectly, they may provide the Independent Assessor with additional documentation or indicate where they feel the submitted documentation meets the STOW-TT Minimum HSE Requirement and ask the Independent Assessor to review the documentation again.
 - 11.2 If the Independent Assessor is unable to accept that the documentation meets the STOW-TT Minimum HSE Requirements and the applicant considers there are grounds for appeal, the applicant may make representation to the STOW-TT Project Office.
12. If it is determined early in the assessment that the applicant is not meeting the STOW-TT Minimum HSE Requirements, the Assessor may continue the assessment after discussion with and written consent from the applicant.
13. Providing the Independent Assessor considers the submitted documentation meets the STOW-TT Minimum HSE Requirements for either the lowest level of certification or the level at which the applicant has asked to be certified as compliant to, the Independent Assessor will contact the applicant and make arrangements to carry out a site visit at the applicant's place or places of work.

14. The Independent Assessor will make the site visit and carry out the prescribed process of audit and verification that the applicant's documented HSE management system meets the practice on the work site or the place of business of the applicant.
15. Providing the site visit by the Independent Assessor allows verification that the documented HSE Management System is reflective of the practice seen on the work site or place of business, the Independent Assessor will complete a report on the certifying process and recommend certification of the applicant's company to the STOW Implementation Board.
16. The Independent Assessor is required to send a copy of all reports to the STOW-TT Project Office. The report should contain the process they carried out to determine the level of certification they have recommended. **The report undergoes a quality control review and a finalized copy is forwarded to the STOW Implementation Board for a decision.**
17. The Independent Assessor is permitted to withhold submitting the report and recommendation to the STOW Implementation Board pending final payment for the contracted service, but they must advise the applicant if they are willing to recommend certification or not. The Independent Assessor must not withhold submission of the report and recommendation as a means of holding the contractor to ransom.
18. Where a site visit results in the Independent Assessor considering the applicant has not demonstrated the HSE Management System documentation has been effectively implemented in practice, they are required to submit a written report to the STOW Implementation Board recommending refusal of certification explaining why the certificate should not be issued.
19. The applicant may discuss or clarify the issues that the Independent Assessor has found to fall below the requirements and may make arrangements for additional site visits to be made by the Independent Assessor.
20. Where the applicant considers there are grounds for complaint against either the Independent Assessor or the certification process, they should make representation to the STOW-TT Project Office.
21. An applicant that fails to attain certification at the first attempt must re-apply to the STOW-TT Project Office. The original application fee paid to the STOW-TT Project Office will remain valid for a period of three months from the **date of initial application**.
 - 21.1 Where a three month period has lapsed since the applicant made their initial application, that application will be deemed to have lapsed and a re-submission of the application must be made to the STOW-TT Project Office along with application fees.
22. **Companies will be certified if they:**
 - (i) **attain 70% and more in the physical condition tour AND**

(ii) attain the following level of conformance to the STOW HSE Requirements:

Compliance Level	Validity of STOW Certificate
75% in each element	1 year
85% in each element	2 year
95% in each element	2 years plus special mention

23. As soon as the applicant is in receipt of their valid certification, they may enter commercial bids to any member operator company for any service provision that falls within the scope of the level of certification of compliance they hold.
24. Certificate holders must remain current with their certification of compliance requirements at all times and the STOW-TT Project Office may require an Independent Assessor of their choosing, to attend a current certificate holder's premises to evaluate the continued compliance with the STOW-TT Minimum HSE Requirements.
25. An operating company that opts to pursue STOW certification and is successful will receive a "Voluntary Certificate of Compliance".

26. **Unacceptable Practices**

- 26.1 Applicants are strictly prohibited from offering any inducement to Independent Assessors to gain certification.
- 26.2 Where credible evidence exists that applicants have offered any inducement to Independent Assessors to gain certification, the applicant will be automatically prohibited from applying for certificates of compliance for a period of one year. During this time, the STOW Implementation Board will review the circumstances and evidence and may impose more stringent penalties up to and including life time exclusion from being allowed to apply for certification of compliance with the STOW-TT Minimum HSE Requirements.
- 26.3 Independent Assessors are required to report all offers of inducement, or potential offers of inducement that are made to them to the STOW-TT Project Office as soon as they are offered. Assessors have signed a Code of Conduct and are expected to abide by the Code.
- 26.4 Independent Assessors that fail to report such occurrences, and in the opinion of the STOW Implementation Board, credible evidence exists that an offer of inducement was made, the Board will immediately suspend the Independent Assessor's authority to audit companies on behalf of the Board until such time as the Board makes a ruling on the circumstances of the case.

- 26.5 Independent Assessors are strictly prohibited from requesting and receiving any inducement from Applicants to gain certification. If in the opinion of the STOW Implementation Board, credible evidence exists that a request was made or inducement was received, the Board will immediately suspend the Independent Assessor's authority to audit companies on behalf of the Board until such time as the Board makes a ruling on the circumstances of the case.
- 26.6 Independent Assessors are required to file declarations of conflict of interest with the STOW-TT Project Office and failure to do so will result in immediate suspension of the Independent Assessor's authority to audit companies on behalf of the STOW Implementation Board until such time as the Board makes a ruling on the circumstances of the case.
- 26.7 Independent Assessors may not work with applicants or potential applicants to assist them in developing and implementing HSE Management systems that are intended to meet the STOW-TT Minimum HSE Requirements and then act as the Independent Assessor to audit that organization.

SECTION 5

STOW-TT Minimum HSE Requirements

1 Element 1 - HSE Management, Leadership and Accountability

- 1.1 Management endorses an HSE Policy and Standards.

To meet this minimum requirement, Organizations shall have a documented HSE policy statement approved by Senior Management that shows the organization and the arrangements in force for carrying out the policy.

- 1.2 Managers are accountable for HSE performance.

To meet this minimum requirement, there shall be a documented statement, which indicates Managers are accountable for HSE performance. This documented statement shall be endorsed formally by the organization and a record held of the Managers' acknowledgement that this accountability has been communicated to them.

- 1.3 Resources are provided for effective HSE implementation.

To meet this minimum requirement, organizations shall demonstrate that there is a process for allocating resources for the effective implementation of HSE policy, systems and standards including the financial, personnel, and time resources required to implement them.

- 1.4 Managers demonstrate visible HSE leadership through personal example by frequent site inspections and reviews.

To meet this minimum requirement, Organizations shall have managers who demonstrate visible HSE Leadership. Managers will do so by:

- 1) Adhering to Organizational rules i.e. leading by example*
- 2) Conducting inspections of their own sites*
- 3) Visiting remote sites including those not under their control*

- 1.5 Management defines specific and measurable HSE activities to be included in performance plans.

To meet this minimum requirement, organizations shall have documented HSE Performance Plans in place and approved by an appropriate level of management.

- 1.6 The HSE accountabilities of employees are identified and understood.

To meet this minimum requirement, Organizations shall define, document and

communicate HSE accountabilities to all employees.

- 1.7 Systems are in place to influence a positive safety culture.
To meet this minimum requirement, organizations shall have a documented system to influence improved or exceptional HSE performance and shall show how records of the systems that have been used are maintained.
- 1.8 Systems are in place to ensure that employees are aware of expected HSE behaviours and consequences of inappropriate conduct.
To meet this minimum requirement, organizations shall show that they have a documented method of communicating to employees the general HSE behaviours that are expected of them and an indication of the disciplinary range of sanctions that may occur if they do not adopt these behaviours.
- To meet the minimum requirement for identifying the consequences of not meeting the expected HSE behaviours, organizations shall have documented communication of those consequences identifying the range of sanctions that may be imposed for not meeting the HSE behaviour expectations.*
- 1.9 Employees understand that they have the right and responsibility to stop work or refuse to work in unsafe conditions.
To meet this minimum requirement, organizations shall have a documented policy in place informing employees of their rights and responsibility to stop work or refuse work in unsafe conditions.
- 1.10 Bi-annually management principals and other key management participate in HSE Leadership forum with customers to agree on expectations.
To meet this minimum requirement, organizations shall have a documented process that requires senior management to meet with the appropriate leadership teams in their customer organizations to discuss HSE performance and 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.

To meet this minimum requirement, organizations shall have a documented process on selection and appointment of contractors that includes a focus on HSE management approaches.

2 Element 2 – Legal Requirements and Document Control

- 2.1 HSE Management system ensures conformance with legal requirements as a minimum.
To meet this minimum requirement, organizations shall show compliance with the Trinidad & Tobago Occupational Safety and Health Act (TTOSHA) 2004 as amended by the Occupational Safety and Health (Amendment) Act 2006 as well as all other related Health, Safety and Environmental Legislation of Trinidad and Tobago. The Organization shall have a documented process in place for the identification of legal requirements. This process shall include current and pending legislation.
- 2.2 Systems are in place to ensure that HSE documents are established and documented.
To meet this minimum requirement, an organization shall show that they have a register of the HSE related documentation they have deemed to be required, or are legally required to have.
- 2.3 Systems are in place to ensure that HSE records are established, maintained and available.
To meet this minimum requirement organizations shall show that they have a documented system that has identified the HSE records that they are required to keep, the method in which they are to be kept, the location they are to be kept in and the length of time they should be kept.

3 Element 3 – Risk and Change Management

- 3.1 HSE risk management processes are applied to critical activity.

To meet this minimum requirement, organizations shall demonstrate that they have a documented process in place for the identification of critical activities. Based on these activities, the organizations shall ensure that they have implemented a risk management system.

- 3.2 HSE risk assessment process involves people with relevant knowledge and experience.

To meet this minimum requirement, organizations shall show that the risk assessment process they use provides the following:

- i. Appropriate personnel are competent in understanding and following the risk assessment process to be used.*
- ii. Individual knowledge within the group that carry out the risk assessment process is broad enough to ensure reasonable hazards will be identified and that the need for control measures will be properly considered.*
- iii. The individual experience within the group that carry out the risk assessment is sufficient to ensure that any control measures in place are reasonable and effective.*

- 3.3 HSE risks are recorded and maintained in a risk register and are reviewed and updated at least annually.

To meet this minimum requirement, organizations shall document all risk assessments onto a risk register. Risk assessments shall be reviewed and updated once every 12 months.

- 3.4 There shall be an appropriate Change Management Process in place to ensure:
(a) Changes are properly assessed (b) Change does not introduce unacceptable new risk (c) New risk is adequately identified and controlled.

To meet this minimum requirement, organizations shall have a documented change management process using a controlled document system, identifying people, process, equipment and duration along with an effective relevant organizational communication method.

4 Element 4 – Planning, Goals and Targets

- 4.1 Systems are in place to ensure that HSE is an integral part of business planning.
To meet this minimum requirement, organization shall have a documented process defining how HSE is considered in business planning.
- 4.2 Company-wide measurable HSE goals and targets are set and documented.
To meet this minimum requirement, organizations shall set HSE targets based on review of historical performance data that sets a reasonable expectation of being scored while demonstrating a need for continuous improvement. In setting the targets, they shall be defined in such a way that unambiguous measurement can be demonstrated. The organization shall set HSE goals, express them in a documented way and measure and report on the performance against the goals set.
- 4.3 HSE Plan to consist of the following components:-
- 4.3.1 Organizational Chart – Roles and Responsibilities.
To meet this minimum requirement, organizations shall have a documented, up to date HSE plan that includes an organizational chart that clearly identifies the roles of individuals or groups of individuals in making the HSE plan work. Organizations shall have documented roles and responsibilities of individuals that have accountability for making the HSE plan work.
- 4.4 Procedures exist for job activities associated with services provided – these show how HSE will be managed inclusive of stopping unsafe work.
To meet this minimum requirement, organizations shall document procedures for job activities which clearly explain the job steps to be taken, the way in which personnel will be kept safe from harm and identifies the right or responsibility of individuals to stop work that is unsafe.
- 4.5 Resumes exist for all critical personnel (Managers, Supervisors, foremen, HSE advisors, specialists etc).
To meet this minimum requirement, organizations shall show that they have a system in place to identify the critical personnel in their organization and to verify that the resume of the individual is an accurate reflection of the qualifications and experience of the person to which it relates.
- 4.6 Method Statement (this should be tied directly to 6.3).
To meet this minimum requirement, organizations shall have a method statement that addresses the possibility of new personnel using equipment they are unfamiliar with.
The Method Statement shall provide a sequence for carrying out specific tasks within a job work scope. This is required where the sequence in which specific tasks must be done is critical to the safety of the overall operation.

5 Element 5 – HSE Competency and Training

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

To meet this minimum requirement, organizations shall ensure that they have a competent workforce. Competence shall be defined in terms of individuals Having the required knowledge, training and experience to fulfill assigned work tasks and also understanding their limitations.

Organizations shall conduct a training needs analysis for appropriate personnel. Organizations who have a training programme including a training needs analysis shall ensure that it is based on their service risk and would have demonstrated compliance to this element. The programme must address training that covers worker exposure and must include both permanent and temporary workers. Training records shall include assessments where applicable, pass scores, trainer information and records. Examples – Catalyst Services – SCBA training; inert gas entry confined space training; emergency response for inert gas entry.

Organizations shall ensure that they have a system to qualify training facilitators and that all training records for personnel are maintained. Organizations shall ensure that where training providers are being sought to conduct training, a review shall be done on the competence of the trainers. This review shall include experience, qualifications and previous experience on similar training or topics. Information of this nature should be audited for authenticity.

5.1 Control of work.

To meet this minimum requirement, organizations shall show that they have an effective method for controlling work. Organizations shall also have a system for ensuring all personnel are properly trained in the control of work methods they use.

5.2 Risk Assessment – Job Hazard Analysis.

To meet this minimum requirement, organizations shall demonstrate the method of assessing competence of their personnel to assess the risks associated with the work they do and show the method of documenting this.

5.3 Emergency Response.

To meet this minimum requirement, organizations shall have an emergency response plan and shall communicate the details of the emergency response plan to their employees. Organizations shall have a system to train personnel that have specific duties under the emergency response plan.

5.4 Defensive Driving.

To meet this minimum requirement, organizations shall show a register of the company authorized drivers and maintain a register of the defensive driving training they have undergone.

- 5.5 Accident prevention and reporting.
To meet this minimum requirement, organizations shall have a documented system to report all accidents and a system to communicate the organization's accident prevention programme to employees. Organizations shall record the employees that have received this information.

Organizations shall communicate the legal requirement for employees to report all accidents and incidents they are involved in, witness or otherwise come to know about.

- 5.6 Environmental Awareness.
To meet this minimum requirement, organizations shall have a documented policy with respect to the minimization of the impact on the environment. The policy shall be effectively communicated employees and a record kept of the method in which it was communicated.

- 5.7 Hazardous Communication.
To meet this minimum requirement, organizations shall have a system in place for communicating to all relevant employees the safe methods required to handle, store, use and dispose of each harmful substance they hold on their location/.s

- 5.8 Personal Protective Equipment (PPE).
To meet this minimum requirement, organizations shall have a process to train their employees to correctly use and maintain the PPE they provide for use in their workplace.

Organizations shall maintain a register of the training or information they give to their employees to ensure that the PPE is used and maintained correctly.

- 5.9 New Employee Inductions.
To meet this minimum requirement, organizations shall have a system in place that ensures all new employees, or those transferred from other work sites are provided with sufficient initial information to enable them to work in a safe way. This process is referred to in these minimum requirements as induction training.

- 5.10 Tropical Basic Offshore Safety Induction & Emergency Training – (T-BOSIET).
Organizations that do not work in the offshore energy sector are not obliged to meet this minimum requirement.

To meet this minimum requirement, organizations that work in areas that involve personnel travelling offshore to work shall demonstrate that their personnel meet the minimum requirement for training in basic offshore safety induction and emergency training for tropical climates.

- 5.11 **Confined Space Training**
To meet this minimum requirement, organizations shall ensure that workers who

enter spaces undergo a thorough and suitable Confined Space Training. Training of this nature should be conducted by a competent trainer with both the knowledge and experience of confined space work hazards.

5.12 **SCBA/ Respirator Training**

To meet this minimum requirement, organisations shall ensure that workers who are required to wear respirators including Self Contained Breathing Apparatus (SCBA) shall be adequately and suitably trained.

5.13 **Fall Protection/ Fall Prevention Training**

To meet this requirement, organisations shall ensure that workers who are required to work at height on both temporary and permanent platforms are at minimum, trained in the in fall protection requirements, personal fall arrest systems (use; fit; limitations), rescue for fall at heights and dropped object management.

5.14 **First Aid/ CPR Training**

To meet this minimum requirement, organisations shall ensure that workers who work in remote areas or electrical service are trained in first aid/CPR. Training shall only be done by a training body authorised to conduct this type of training.

5.15 **Banksman Training**

To meet this minimum requirement, organization that require workers to bank vehicles, forklifts and cranes shall have the appropriate training for each of area where they require banksmen.

5.16 **Hot Work Safety**

To meet this requirement, organizations that require workers to conduct hot work including welding, cutting, grinding, shall provide suitable and thorough training for this risk work.

6 Element 6 – Security

- 6.1 Organizational Data Base – employee address, photo, age, last place of employment.

In order to meet this minimum requirement, all organizations shall have a process in place for establishing and maintaining a database that provides:

- i. The current residential address of each employee*
- ii. A picture of each employee that is verified as being a true likeness by an officer of the organization that employs them*
- iii. The age of the employee that has been verified*
- iv. The name and address of the employer that immediately preceded the current employer*

- 6.2 Evidence of Background Character Check – (Character Check Register).

To meet this minimum requirement, organizations shall have a documented process for carrying out background character checks on employees where applicable, prior to employment, or within six months of employing a temporary or probationary employee.

- 6.3 Equipment and Personnel Control Plan (Asset Specific).

To meet this minimum requirement, organizations shall have an equipment and personnel control plan which provides an up-to-date understanding of the location, use and condition of all of the safety critical equipment that they own and the location and skills of the personnel that they employ.

7 Element 7 – Health and Hygiene

7.1 Substance Abuse Management Policy.

To meet this minimum requirement, organizations shall have a documented Substance Abuse Management policy that provides for legally compliant processes that inform the employee of:

- i. The Organization's policy with respect to the use of prohibited substances including alcohol and/or drugs*
- ii. The Organization's definition of substance abuse as covered in the policy*
- iii. What the organization considers to be a violation of the Substance Abuse Policy*
- iv. What process or processes the organization may use to test for substance abuse*
- v. What process or processes the organization will use to handle violations of the substance abuse policy*

7.2 Fit for work: United Kingdom Off Shore Operators Association (UKOOA) Medical or equivalent.

To meet this minimum requirement, organizations shall ensure that employees who are required, undergo medical exam by a certified physician who endorses the medical fit to work certificate as "Fit to work". The minimum requirement for all offshore workers shall be to be given a medical examination that meets the standard of the UKOOA Medical guidelines.

7.3 Plan to protect employees from work related health hazards.

To meet this minimum requirement, organizations' HSE Management system and procedures shall require the development of a Health Risk Management Plan in which:

- i. The risk is identified*
- ii. The suitable steps for control of the risk are identified*
- iii. The steps identified are implemented*
- iv. The implemented steps are monitored for effectiveness*

7.4 Employees have access to adequate medical and first aid services.

To meet this minimum requirement, organizations shall demonstrate that their HSE management systems and procedures provide for the legislative requirements of Trinidad and Tobago in as much as they relate to the provision of access to adequate medical and first aid services and equipment.

8 Element 8 – Environmental Management

8.1 Environmental Policy.

To meet this minimum requirement, organizations shall have a general policy statement on the commitment of management to minimizing the impact their activities have on the environment and shall communicate the policy to their employees. Organizations with an integrated policy statement incorporated in Element 1.1, would have met this requirement.

8.2 Identify environmental aspects (in accordance with legislative requirements).

To meet this minimum requirement, Organizations shall have a process for identifying the impact of their operations on the environment in accordance with the legal requirements of Trinidad & Tobago.

8.3 Register of environmental legislative requirements.

To meet this minimum requirement, Organizations shall maintain an up-to-date register identifying the legislative requirements and duties that they understand their organization is required to comply with.

8.4 Environmental Management Programme including Emergency Response Plan (ERP).

To meet this minimum requirement, Organizations that have identified the need for Environmental Management Systems shall document an Environmental Management Programme supported by an Environmental Management Plan if their operations present a risk to the environment.

All organizations shall document their willingness to cooperate with other organizations having Environmental Management Programmes and Plans.

8.5 Clearly defined roles and responsibilities to support Environmental Management System.

To meet this minimum requirement, Organizations that have identified the need for Environmental Management Systems shall document the roles and responsibilities for identified critical personnel who support the EMS. Organizations shall communicate the roles and responsibilities to the persons identified.

8.6 Environmental Management System (EMS) documentation e.g. Policy, EMS manual, procedures.

To meet this minimum requirement, Organizations that have identified the need for Environmental Management Systems shall demonstrate that they maintain detailed information on the EMS which is valid and updated as required.

8.7 Emergency Response Plans including drill schedule.

To meet this minimum requirement, Organizations that have identified the need for Environmental Management Systems shall identify and maintain a list of the environmental emergency scenarios they may encounter. Such organizations shall have emergency response systems, including documented emergency response plans and resources in place to respond to the identified emergency situations.

Organizations that have identified that they pose little or no risk to the environment shall document their willingness to cooperate with other organizations having emergency response plans.

8.8 Annual auditing of the EMS.

To meet this minimum requirement, Organizations that have identified the need for Environmental Management Systems, shall audit the system formally at least once every 12 months and shall maintain records of the audit, develop action plans and demonstrate the process for closing out agreed action items.

Organizations that have identified that they pose little or no risk to the environment shall review their general policy statement at least once every three years or if their operations change to one that may impact the environment.

9 Element 9 – Incident Reporting and Investigation

9.1 Systems for reporting, investigating, managing incidents.

To meet this minimum requirement, organizations shall have documented systems in place that describe the process for reporting, investigating and managing incidents to the minimum levels required by legislation in Trinidad and Tobago.

Organizations shall have a documented system that informs individuals, supervisors, managers and others of the process they are to follow in order to ensure incidents are investigated.

9.2 Incident investigation processes for critical incidents.

To meet this minimum requirement organizations shall have a process for determining the level of investigation that is needed for each type of incident and for those identified as critical, organizations shall have a documented process to be used to investigate these incidents.

Organizations shall demonstrate the documented process that is to be followed.

9.3 Stop Work Order following a critical incident.

To meet this minimum requirement, organizations shall have a documented, defined and communicated method to stop or close down operations in a timely but safe manner following notification of a critical incident.

10 Element 10 – Crisis and Emergency Management

- 10.1 Systems for identification of emergency situations & consequences.
To meet this minimum requirement, organizations shall have a systematic and documented approach for identifying reasonably foreseeable emergency situations that could arise out of their normal operations, and for identifying the reasonably probable consequences that could occur from the emergency situation being realized.
- 10.2 Response Plans are documented, accessible and communicated.
To meet this minimum requirement, organizations shall document the approach they will take to deal with the emergency scenario should it be realized.
- Organizations shall ensure that emergency response plans are available to all that need to use or be familiar with them and shall show evidence of the method in which they communicate the content of the emergency response plans to the workforce.*
- 10.3 Resources required are identified, available and tested.
To meet this minimum requirement, organizations shall document the resources that are required and demonstrate that they are available at the location identified in the emergency response plan/s. Organizations shall periodically test the resources identified to ensure they are functioning as intended.
- 10.4 Staff is trained in and understand the emergency response plans.
To meet this minimum requirement, organizations shall have a documented process for identifying those personnel that are required to be trained for their role in the emergency response plan and the frequency for refresher training.
- Organizations shall have a system for testing the effectiveness of the emergency response plan.*
- 10.5 Emergency response drills and exercises are conducted regularly.
To meet this minimum requirement, organizations shall have a documented matrix of emergency response drills and emergency response exercises that cover the range of emergency response scenarios that have been identified by the organization.

11 Element 11 – Monitoring, Audit and Review

- 11.1 HSE performance is measured, monitored, recorded and analyzed.
To meet this minimum requirement, organizations shall have clearly defined measurement criteria described in their HSE Management system or HSE performance planning documentation
- 11.2 Work Sites conduct HSE inspections and audits.
To meet this minimum requirement, organizations shall have records of the HSE inspections and internal audits that have been carried out.
- 11.3 Annual management reviews are conducted.
To meet this minimum requirement, organizations shall demonstrate that Management is actively involved in reviewing the HSE performance of the work sites they control
- 11.4 The HSE Policy and Standards are reviewed once every three years.
To meet this minimum requirement, organizations shall review and re-issue the organization's general policy statement with a new date at least once every three years.

Organizations with documented HSE management systems shall have a document control system that indicates the last time the document was reviewed and the name of the appropriate level of approving manager in the organization.

SECTION 6

Guidance on the STOW-TT Minimum HSE Requirements

1 Guidance - Element 1: HSE Management Leadership and Accountability

1 STOW-TT Minimum HSE Requirement Statement 1.1 *Management endorses an HSE Policy and Standards*

1.1.1 Guidance

- a. Organizations are required to have a documented HSE policy statement approved by Senior Management that shows the organization and the arrangements in force for carrying out the policy.

An organization will not be eligible to work with the energy sector of Trinidad and Tobago unless they are able to show that there is a proper General HSE Statement.

- b. The General HSE Policy Statement is usually a one page corporate statement signed by a senior executive of the organization endorsing the policy.
- c. Guidance on how to construct effective General HSE Policy Statements can be found in many HSE reference texts.
- d. The general statement is acceptable when it seeks to:
 - i. Identify hazards and control risk.
 - ii. Provide safe work conditions and equipment.
 - iii. Prevent accidents.
 - iv. Assure competence and provide training.
 - v. Provide safe handling and transportation of harmful substances.
 - vi. Consult with employees on HSE management and performance.
 - vii. Review the policy at regular intervals or when necessary – Regular is generally accepted as meaning at least once every three years.
 - viii. Commit the organization to comply with all relevant legislation at all times.

- e. An HSE standard adopted within any organization may be detailed or general and it is the level of risk associated with work that the standard is set up for that determines how complex this needs to be.
- f. The number of standards and the level of detail that these need to address should be appropriate to the type of operation and levels of risk carried out by an organization.
- g. In Trinidad and Tobago, organizations will have met the minimum legal requirement when they can demonstrate that the standards developed in their organization have arisen from the findings of the annual risk assessment they are required to carry out.
- h. Management is generally accepted to have endorsed HSE Standards when there is a system for demonstrating approval of the standards at an appropriate management level.

1.2 STOW-TT Minimum HSE Requirement Statement 1.2 ***Managers are accountable for HSE performance***

1.2.1 Guidance

- a. For an organization to demonstrate a minimum level of meeting this STOW-TT Minimum HSE Requirement there must be a documented statement, which indicates Managers are accountable for HSE performance. This is commonly incorporated into the documented roles and responsibilities of the managers within an organization.
- b. The documented statement that indicates managers are accountable for HSE performance should be endorsed formally by the organization and a record held of the Managers' acknowledgement that this accountability has been communicated to them.
- c. All of the managers within an organization, and to some extent the supervisory levels of smaller organizations or project teams, should have an appropriate level of accountability for the HSE performance of the work areas they control.
- d. Organizations involved in higher risk activities should be able to demonstrate the manner in which they hold managers and/or supervisors accountable for HSE performance. This can be demonstrated in many ways, but some examples are:
 - i. It is common to find a portion of management bonus or performance related remuneration to be clearly linked to the HSE performance of the area/s they control or teams they work in.
 - ii. Some organizations use HSE performance as one of the criteria to be reviewed when promoting managers or supervisors. Where this is the case, the organization is expected to demonstrate how the HSE performance is

measured and the weight that they place on that performance in making decisions on manager or supervisory promotion.

- iii. Organizations may choose to offer evidence of managers that have been sanctioned, disciplined or otherwise coached in areas where the HSE performance in their area of operation has fallen below the organization's expectation.
- e. Within organizations where higher risk activity is undertaken, or where HSE performance has been below organizational expectation, it is expected that managers and supervisors will be able to discuss the HSE performance of their operations in a way that demonstrates their understanding of the effectiveness of the risk identification and mitigation methods utilized and where appropriate, demonstrate an understanding of agreed improvement plans.

1.3 STOW-TT Minimum HSE Requirement Statement 1.3

Resources are provided for the effective HSE implementation

1.3.1 Guidance

- a. Allocating resources for the effective implementation of HSE policy, systems and standards involve providing the financial, personnel, and time resources required to implement them.
- b. The level of financial resources required will vary considerably between organizations. The dollar commitment is not the yard-stick by which this requirement will be measured; it is the efficient use of the appropriate value that will determine if an organization meets the STOW-TT Minimum HSE Requirement.
- c. Areas where financial resources can be demonstrated to be provided for effectively implementing HSE management policies, systems and standards are numerous, some examples are:
 - i. Appropriate procurement processes that indicate the HSE considerations that may place limits on the sourcing of suppliers.
 - ii. Appropriate utilization of training and information material either internally or externally.
 - iii. Provision of appropriate, fit for purpose, personal protective equipment for identified employees associated with risk assessed activity.
 - iv. Funding appropriate maintenance programmes which provide assurance that plant and equipment remain in a safe condition.
- d. Areas where personnel resources can be demonstrated to be provided for effectively implementing HSE management policies, systems and standards are:

- i. Organizations that operate in low risk environments, where limited employees may be assigned specific HSE performance related duties on appropriate levels of supervision or management who are either formally trained or can be demonstrated to be reasonably experienced to enable them to operate and maintain the established HSE management policies, systems and standards.
 - ii. As the risk levels that organizations operate in increases, or the number of personnel at risk increases, it is expected that there will be increasing availability of access to specialist, professional advisors in the area of HSE management. This availability may range from part time or project specific availability through to full time, multiple or teams of HSE professionals being embedded within the organization.
 - iii. Organizations are required to demonstrate that they can allocate the appropriate number of personnel to work on tasks or projects so that the work can be carried out in a way that reasonably meets the HSE policy, systems and standards of the organization. This will take into account the working hours of the person/s, the multi-task requirements and the level of competence of the personnel carrying out the work.
- e. In addressing the provision of time resources, organizations are required to demonstrate that they allocate sufficient time to enable preparation, operation and completion of work tasks.
- i. In terms of preparation, the organizations must be able to demonstrate the time for planning of work, the time for training or informing their employees of the work to be carried out.
 - ii. In the area of allocating time to carry out work activities, organizations must demonstrate reasonable methods of assessing time allocation based on experience or industrial standards and show their ability to revise and communicate time allocation as circumstances dictate.
 - iii. The completion of work tasks should be clearly defined and organizations should demonstrate their understanding of time needed to clear up or return a worksite to normal operation, time needed by supervisors or managers to complete reports and where appropriate hold de-brief meetings.

1.4 STOW-TT Minimum HSE Requirement Statement 1.4

Managers demonstrate visible HSE leadership through personal example by frequent site inspections and reviews.

1.4.1 Guidance

- a. In meeting the minimum requirement for managers to demonstrate visible HSE leadership through personal example there are many ways that this can be demonstrated both internally and to Independent Assessors.
- b. Managers should always adhere to the organizational rules associated with HSE performance. For example they should:
 - i. Always wear the appropriate personal protective equipment for the work area they are in.
 - ii. Intervene whenever they observe that it is not being carried out in accordance with the organizational rules for HSE performance.
 - iii. Demonstrate understanding of the work that is being carried out in their areas of responsibility and being able to talk about the risks and control measures associated with that work.
 - iv. Always wear seat belts and observe relevant traffic regulations when driving their vehicles.
- c. It is sometimes difficult for managers to make frequent site visits to remote locations, especially if the site belongs or is under the control of another organization.
- d. To meet this minimum requirement, organizations will have managers who are able to:
 - i. Demonstrate their availability and attempts to visit remote locations.
 - ii. Have a structured and, depending on the risk levels associated with the work activities, a documented approach to discussing the HSE aspects of work being carried out by their personnel on remote sites.
 - iii. Have a structured approach to reviewing the experience of the personnel that carry out work at remote sites. This may include post-job reviews; close out team meetings or upward feedback in such a way that the manager is shown to be concerned with the HSE approaches and performance of the employees.
- e. Managers are expected to be involved in the inspection of their own sites, their own equipment and review of work that is carried out under their direct control. This may include:
 - i. Site visits resulting in reports that identify satisfactory and unsatisfactory performance along with corrective actions being identified where appropriate.
 - ii. Review of inspection reports carried out by sub-ordinates or others in the organization.
 - iii. Demonstrate an understanding of the status of corrective actions that result from any appropriate inspection or site visit.

- iv. Managers should be demonstrably involved in approving and monitoring corrective actions that are associated with improved HSE performance.

1.5 STOW-TT Minimum HSE Requirement Statement 1.5

Management defines specific and measurable HSE activities to be included in performance plans

1.5.1 Guidance

- a. A management defined HSE activity is one that is approved by management. At the lowest risk levels, this minimum requirement will be met when documented HSE Performance Plans are in place and approved by an appropriate level of management.
- b. Where organizations operate in higher risk activities, this minimum requirement will only be met when the HSE activities within performance plans are measured using a transparent process, are appropriate, clearly defined and specific.
- c. There are many types of HSE activities that can be included within HSE performance plans; these broadly fall into two categories that are called “Reactive” and “Proactive”. Reactive activities, such as investigation of incidents are very important in terms of measuring and understanding overall HSE performance. They are addressed in other areas of the requirements. For this minimum requirement to be met, the focus will be on Proactive HSE activity.
- d. The types of HSE activity that is expected to be provided to meet this minimum requirement will be identified based on the level of risk the activity of the organization is involved in. Some examples of the proactive measures that contribute to meeting this requirement and may be included in the performance plan of an organization are:
 - i. Supervisors will make three site inspections per week of duty and they will record the findings of that inspection in their shift log.
 - ii. Work carried out under a work permit will not commence unless there is a documented Job Safety Analysis available for all the tasks to be carried out and it is reviewed by the work team and their supervisor immediately prior to work commencing. A record of the review will be recorded on the Job Safety Analysis Sheet/s identifying the people that attended the review and the date and time the review took place.
 - iii. Fifty percent of all Work Permits associated with work that is complete will be audited by the HSE Advisor and a report of these audits will be included in the HSE Advisor’s monthly report where the total number of Work Permits issued in the month is identified, the number of work Permits audited is

identified and any significant findings along with corrective actions is identified.

- iv. Department heads will review the HSE corrective actions register at least once each week and close out or report on status of the actions where appropriate.
 - v. The Country Manager will attend and address one team HSE meeting every quarter and this will be recorded in the minutes of the meeting along with a list of the attendees and an outline of the topic the country Manager spoke about at the meeting.
 - vi. Each manager will identify at least one employee per month to receive an HSE recognition or award for performance and they will record that recognition or award in the HSE recognition and award register.
- e. In meeting this minimum requirement, many organizations should be able to integrate the activities identified to compliment the meeting of other expectations in these STOW-TT Minimum HSE Requirements.

1.6 STOW-TT Minimum HSE Requirement Statement 1.6

The HSE accountabilities of employees are identified and understood.

1.6.1 Guidance

- a. To meet this minimum requirement, there needs to be documented HSE accountabilities applied either specifically or generically to all employees. This may be achieved by:
 - i. Placing specific accountabilities on the employee that are documented in the job description and/or the roles and responsibilities section of the employees contract of employment.
 - ii. Placing generic accountabilities that are documented in all employees contracts of employment where additional accountabilities are documented in the positions for which they apply.
- b. Examples of generic accountabilities are:
 - i. Employees are accountable for following all HSE rules at all times.
 - ii. Employees are accountable for reporting all accidents and incidents they are involved in or witness to their direct line of supervision as soon as they reasonably can.
 - iii. Employees are accountable for using all equipment in the work place as designed and with design safety features operating.

- iv. Employees are accountable for stopping any work that they recognize as being unsafe and reporting it to their supervisor.
- c. In order for organizations to be able to demonstrate that the HSE accountabilities have been communicated and understood they should maintain a record of the communication method and proof of employee acceptance of understanding the accountabilities they are to be held responsible for meeting.
- d. Some methods of recording the communication and employee acceptance of understanding are:
 - i. Within the body of a contract of employment a specific section that states: “I have been advised of the HSE accountabilities I am required to meet, all questions I have regarding these accountabilities were answered and I understand that meeting these accountabilities are a significant condition of my employment.” This statement should be signed and dated by the employee and a representative of the organization.
 - ii. Some organizations maintain an “HSE Communications Register” which is used to record the day and date the communication takes place. With respect to explaining HSE accountabilities to employees, the register should record who was in attendance, the name of the person that communicated the HSE accountabilities, the fact that all questions were answered satisfactorily and that all in attendance agreed that they understood the accountabilities that were explained to them.
- e. Where organizations are involved in higher risk activity, there is some requirement to show that employee HSE accountabilities are reviewed and revised as appropriate.

1.7 STOW-TT Minimum HSE Requirement Statement 1.7
Systems are in place to influence a positive safety culture.

1.7.1 Guidance

- a. There are many ways in which to reward improved or exceptional HSE performance. In order to meet this minimum requirement, organizations will need to demonstrate they have a documented system in place.
- b. Where organizations are involved in higher risk activity and/or high man-hours, it is reasonable that the organization be asked to demonstrate how historically the HSE performance recognition system is operated.
- c. Some HSE recognition systems operate on an individual based approach where the individual is identified as having done something to attract recognition.

- d. Some HSE recognition systems operate where teams or organizational groups are recognized for team or organization performance that meets or exceeds pre-defined performance indicators.
- e. Some HSE recognition systems operate with pre-determined frequencies, such as monthly, quarterly or annual recognition being made, others operate on an “as identified” basis.
- f. Many organizations operate recognition systems that combine some or all of the approaches mentioned above.
- g. It is not required that HSE recognition systems involve direct financial reward. While this is a common method, other types of rewards are:
 - i. Safe Employee of the Month Plaque.
 - ii. A designated parking place for the safe employee of the month.
 - iii. A work day to be taken as a day off with family.
 - iv. A letter of appreciation from management.
 - v. Meal vouchers.
 - vi. Useful household items, often linked to off the job HSE such as fire extinguishers, first aid kits or flash lights.
- h. To meet this minimum requirement, organizations will need to show how records of the recognition systems that are used are maintained.

1.8 STOW-TT Minimum HSE Requirement Statement 1.8

Systems are in place to ensure that employees are aware of expected HSE behaviours and consequences of inappropriate conduct.

1.8.1 Guidance

- a. To meet this minimum requirement, organizations will need to show that they have a documented method of communicating to employees the general HSE behaviours that are expected of them and an indication of the disciplinary range of sanctions that may occur if they do not adopt these behaviours.
- b. For low risk activity, organizations will meet the minimum requirement where they are able to show the documented system and process they have in place for identifying and communicating the expected HSE behaviours.
- c. Organizations that are involved in higher risk activity are likely to be required to show the effective communication and implementation of the expected HSE behaviours system.
- d. Some of the common expected HSE behaviours organizations require from their employees are:

- i. Not to be involved in practical jokes, commonly referred to as “horse-play”.
 - ii. To report the taking of any medication while in the workplace.
 - iii. To follow the HSE rules of the organization at all times.
 - iv. To report all accidents or incidents to a supervisor.
 - v. To stop work that is unsafe and directly report the occurrence to a supervisor.
 - vi. To play an active role in all tool box meetings.
- e. In order to meet the minimum requirement for identifying the consequences of not meeting the expected HSE behaviours, organizations will need to demonstrate a documented communication of those consequences.
- f. Many organizations communicate and record the required HSE behaviours in employee contracts or in site specific rule communications.
- g. However the communication is made, it is necessary for organizations to identify the range of sanctions that may be imposed for not meeting the HSE behaviour expectations. Some examples of this are:
- i. Within an employee contract, a statement to the effect that “where you fail to meet the HSE behaviours identified in this contract, the company may discipline you in line with current policy that may involve any disciplinary measure up to and including dismissal”.
 - ii. Where site rules are displayed in a workplace, a sign regarding the need to wear safety footwear may read “Personnel entering this area are required to wear safety shoes, failure to do so may result in disciplinary action being taken.
 - iii. Where site safety rule pamphlets or books are issued, in identifying the required HSE behaviours, there should be a statement alerting the reader to the consequence of not meeting the HSE behaviour expectation. This may be a statement such as “Personnel failing to meet these expectations will be prohibited from working on the site.
 - iv. Where site rule pamphlets or books are used, it is expected that organizations will have an effective method of recording the issue of these pamphlets/books to personnel.

1.9 STOW-TT Minimum HSE Requirement Statement 1.9

Employees understand that they have the right and responsibility to stop work or refuse to work in unsafe conditions

1.9.1 Guidance

- a. The minimum legal requirement in Trinidad and Tobago is for employees to exercise their right to stop work that is unsafe, where the serious and imminent danger is to themselves, or their continuing to work is likely to cause harm to others.
- b. At the lowest risk levels, organizations are expected to have an effectively communicated policy that informs the employees of their duty under legislation.
- c. Where organizations are involved in higher levels of risk activity, this minimum requirement will require organizations to show a suitable policy that empowers or requires employees to stop their own work, the work of other employees or the work of other third party employees where the risk is apparently unacceptable.
- d. The detail and extent of the right or requirement to stop work will be considered, given the levels of risk that the organizations' activity involves, however any acceptable statement must be clearly documented and recorded.
- e. Independent Assessors will expect employees to be able to describe reasonably well, the rights, requirements and process for stopping work that is unsafe.

1.10 STOW-TT Minimum HSE Requirement Statement 1.10
Bi-annually management principals and other key management participate in HSE Leadership forum with customers to agree expectations

1.10.1 Guidance

- a. In order for an organization to meet this minimum requirement, they need to document a process that requires senior management to meet with the appropriate leadership teams in their customer organizations to discuss HSE performance and expectations.
- b. Where organizations are involved in higher levels of risk activity, it is expected that they will have a system in place for requiring the senior managers to meet with appropriate levels of leadership in their customer base, where HSE performance is an apparent concern, especially where control of the performance is not within the control of the organization working for the customer.
- c. Organizations are also expected to be able to demonstrate the senior management's willingness to accommodate requests from appropriate levels of their customer leadership teams to meet and discuss HSE performance and Expectations.
- d. An organization will demonstrate that willingness when they are able to show recent attendance at such meetings with their customer leadership groups.
- e. Organizations that are able to describe and demonstrate how they agree on HSE expectations when working on multi-occupancy sites or projects, possibly through

use of management approved gap analysis and bridging agreements will also demonstrate some level of compliance with this minimum expectation.

- 1.11 STOW-TT Minimum HSE Requirement Statement 1.11
Management will have in place a contractor's assessment process that specifically addresses the suitability and integrity of their proposed contractor's HSE Management system to perform work safely.

1.11.1 Guidance

- a. In order for an organization to meet this minimum requirement, they need to have a documented process on selection and appointment of contractors that includes a focus on HSE management approaches.
- b. Where organizations follow a similar approach to the STOW-TT Minimum HSE Requirements process, it is likely that they will be able to demonstrate compliance with this expectation.
- c. It is likely that by contract, the operator's contractor will be required to gain the operator's approval for any service provider who is not the operator's contractor but who carries out work under the work scope of the contract. (Sub-Contractors will be required to be approved by the operator)

2 Guidance - Element 2: Legal Requirements and Document Control

- 2.1 STOW-TT Minimum HSE Requirement Statement 2.1
HSE Management system ensures conformance with legal requirements as a minimum

2.1.1 Guidance

- a. In reviewing legal compliance, organizations will need to show compliance with the all related Health, Safety and Environmental Legislation in Trinidad and Tobago.
- b. Organizations that operate in the lower risk areas of the industry are likely to meet this minimum requirement where the HSE Management System documentation, or General Policy statement commit them to meeting legislative requirements as a minimum standard.
- c. Examples of the type of statements within the organizational documentation that the Independent Assessor will look for are:
 - i. The company will always conduct operations within the legislative framework.
 - ii. Where legal requirements exceed internal standards, the company will adopt the legal standard.

- iii. Whenever the company becomes aware of any legislative non-compliance, they will act quickly to bring the company back into compliance.
- iv. Legal requirements for HSE will be seen as the minimum acceptable standard for the company.
- d. Where organizations operate in higher risk activity, especially when that activity is normally carried out on a site that is controlled or contracted by an Operating Company, they will be required to demonstrate compliance with this minimum requirement.
- e. Examples of how organizations may be asked to demonstrate compliance with legislation are:
 - i. Evidence of a legal compliance gap analysis review of their HSE Management System by a suitably qualified HSE professional or legal advisor.
 - ii. Demonstrating compliance with one or several specific aspects of the legislation by the Independent Assessor.

2.2 STOW-TT Minimum HSE Requirement Statement 2.2

Systems are in place to ensure that HSE documents are established and documented

2.2.1 Guidance

- a. An organization will be required to show that they have a register of the HSE related documentation they have deemed to be required, or are legally required.
- b. Many organizations operate a system of controlled documentation which ensures that the right documents are developed and held by the organization.
- c. In order to meet this minimum requirement, organizations will be required to show the list of HSE documents they are required to hold and be able to produce the document for review upon request.
- d. It is acceptable for HSE documentation to be held electronically, however they should be available to view at the work sites they cover.
- e. Examples of HSE documents or legislation often required to be kept are:
 - i. Certification relating to plant and/or equipment
 - ii. Environmental Clearance Certificates
 - iii. Issued insurance documentation
 - iv. Fire Certificates
 - v. HSE Management System Manuals

- vi. HSE Policies and Procedures
- vii. Manufacturers operating instructions in so far as they relate to safe operation
- viii. Accident and incident reports and/or statistics
- ix. Medical records
- x. Emergency Response Plans

2.3 STOW-TT Minimum HSE Requirement Statement 2.3

Systems are in place to ensure that HSE records are established, maintained and available

2.3.1 Guidance

- a. In order to meet this minimum requirement organizations will need to show that they have a documented system that has identified the HSE records that they are required to keep, the method in which they are to be kept, the location they are to be kept in and the length of time they should be kept.
- b. For organizations that operate in the low risk areas of the industry, it will probably suffice to demonstrate the documented system.
- c. Where organizations operate in higher risk areas, they shall be asked to demonstrate that they do hold the documents and they are available.
- d. It is acceptable for these records to be held electronically, however they need to be available to the locations and individuals that are reasonably required to have access to them.
- e. The type of HSE records that organizations may keep will be in compliance with their HSE Management System and legislative requirements. Some examples of these are:
 - i. Man-hours worked by employees and others under their control.
 - ii. Accident and incident reports relating to their employees or persons under their control.
 - iii. Records of testing safety critical equipment.
 - iv. Records of overtime hours worked by individual employees or others under their control.
 - v. Records of work carried out on safety critical equipment.
 - vi. Records of any drills or exercises carried out to test emergency response.
 - vii. Records of any safety critical training provided to employees or others under their control.
 - viii. Medical Records.

3 Guidance - Element 3: Risk and Change Management

3.1 STOW-TT Minimum HSE Requirement Statement 3.1 *HSE risk management processes are applied to critical activity*

3.1.1 Guidance

- a. There are many different types of risk management processes that organizations may use to control the potential for harm to occur from their activity. Examples of the process that organizations may use are:
 - i. Tool Box Talks
 - ii. Job Safety Analysis
 - iii. Task Risk Analysis
 - iv. Work Procedures
 - v. Task Based Risk Assessment
 - vi. Job Risk Analysis
 - vii. Risk Assessment
 - viii. Hazard Risk Analysis
 - ix. Hazard Operability Study
 - x. Safe Case Analysis
 - xi. Control of Work Systems
- b. The type and nature of process that organizations use to assess risk will be dependent upon the nature or extent of the risk that is being assessed and some organizations may use more than one process.
- c. At the low risk levels of activity, it is likely that organizations will use simple tools to identify and control the risk in their workplace.
- d. It is a requirement that all organizations be able to show how they identify “critical activity” and how that identification triggers the use of an appropriate risk assessment process.
- e. An example of an organization involved in low level risk activity is perhaps an office cleaning operation, however even within that operation there are some critical activities that should trigger the need for some low level risk assessment to be carried out. For example:
 - i. Use of hazardous chemicals – do the people know how to use these chemicals, do they know what to do if they are harmed by the chemicals, do they have the right personal protective equipment to use these chemicals, etc.

- ii. Use of electric vacuum cleaners – do the people know how to inspect the cable and casing of the cleaner to make sure an electrical hazard is not present, are there any manual handling risks associated with moving the cleaner from office to office, do the people know how to prevent the cable from presenting trip hazards, etc.
 - iii. Use of water to mop floors – do the people that use the mops understand how the floor is a slip hazard when wet, do they know to warn people not to walk on the wet floor, etc.
- f. In the example above, it is obvious an organization involved in this operation would be required to have a system that identifies the use of chemicals, the use of electric vacuum cleaners and floor mopping operations as critical activities.
- g. Organizations that are involved in higher level risk activity will meet this minimum requirement when they can show their risk assessment process:
 - i. Lists all of the critical activities associated with the work to be carried out.
 - ii. Identifies all of the reasonable hazards that each critical activity may present.
 - iii. Uses an appropriate method for estimating or calculating the probability of the hazard being realised.
 - iv. Uses an appropriately described method to describe the risk presented as a result of the potential for harm and probability of occurrence.
 - v. Describes clearly what is considered acceptable risk and what is considered unacceptable risk.
 - vi. Identifies practical, effective risk control measures that reduce the risks identified.
 - vii. Records the residual risk associated with the critical activity once control measures are put in place.
 - viii. Records an appropriate method of approval from an appropriate level of supervision or management that accepts the integrity of the process and agrees with the results that will allow the critical activities to be carried out.
 - ix. Facilitates an effective method of communicating the contents and control measures required to the personnel that will carry out the critical tasks.
 - x. Provides for an effective method of filing, recording and being able to be retrieved as necessary.

3.2 STOW-TT Minimum HSE Requirement Statement 3.2
HSE risk assessment process involves people with relevant knowledge and experience

3.2.1 Guidance

- a. Organizations will meet this minimum requirement when the risk assessment process they use provides the following:
 - i. That appropriate personnel are competent in understanding and following the risk assessment process to be used.
 - ii. That individual knowledge within the group that carry out the risk assessment process is broad enough to ensure reasonable hazards will be identified and that the need for control measures will be properly considered.
 - iii. The individual experience within the group that carry out the risk assessment is sufficient to ensure that any control measures in place are reasonable and effective.
- b. At a worksite level, when assessing risk for single tasks or small jobs it may be appropriate that members of the workforce, with appropriate skills carry out the risk assessment process.
- c. Where an organization is undertaking complex or extended work involving higher levels of risk, or high levels of potential exposure to risk, it is expected that the risk assessment process will provide for the use of topic specialists facilitated by a risk assessment process expert.
- d. Where organizations are likely to work as part of a multiple organization group, it is expected they will have a process for agreeing the risk assessment process to be used on the project and to assist the risk assessment process by providing the skilled and knowledgeable personnel that are most likely to provide integrity of the process.
- e. Where organizations are likely to be the site control for a multiple organization group, and their risk assessment process is to be used, they are expected to have a process of providing risk assessment process specialists to facilitate risk assessment activity or to train the other organizations effectively in their risk assessment process.

3.3 STOW-TT Minimum HSE Requirement Statement 3.3

HSE risks are recorded and maintained in a risk register and are reviewed and updated at least annually.

3.3.1 Guidance

- a. All risk assessments are required to be documented and entered onto a risk register. The risk register should identify:
 - i. The reference number or identifying tag associated with the risk assessment
 - ii. The name of the person/s that carried out the risk assessment

- iii. The date the risk assessment was carried out
- iv. The critical task the risk assessment was carried out to assess
- b. The risk assessment document should indicate how long it is valid for, and it should be removed from the register once the validity has expired.
- c. Alternatively the risk assessment process may allow for the risk assessment to be reviewed by a competent authority that will make any changes in the risk assessment that are relevant and record the details of the review.
- d. The risk assessments process should allow for a risk assessment document to be reviewed and updated once every twelve months.
- e. The risk assessment process should indicate the need to review the risk assessment if site conditions or the circumstances under which the risk assessment was carried out change significantly.

3.4 STOW-TT Minimum HSE Requirement Statement 3.4

There shall be an appropriate Change Management Process in place to ensure:

- a. Changes are properly assessed.
- b. Change does not introduce unacceptable new risk.
- c. New risk is adequately identified and controlled.

3.4.1 Guidance

- a. Any appropriate change management process is likely to be documented using a controlled document system.
- b. The change management system will be detailed to a level based on the levels of risk and potential impact and should identify people, process, equipment and duration along with an effective relevant organizational communication methods.

4 Guidance - Element 4: Planning, Goals and Targets

4.1 STOW-TT Minimum HSE Requirement Statement 4.1

Systems are in place to ensure that HSE is an integral part of business planning

4.1.1 Guidance

- a. Business planning involves a broader review of the activities the organization is likely to be involved in and to this extent, the consideration of HSE performance in each business area should be part of the formal acceptance or rejection process by management to enter into business areas.
- b. For example a drilling contractor management team that is considering working for a new client is expected to have a formal process that includes a review of the risk to HSE performance that the new client will bring along with the risks of other inputs such as revenue and impact on reputation.
- c. For organizations that are involved in the lower level of risk activity, this requirement may be met by documenting a policy for management to consider the impact of new business on HSE performance.
- d. Organizations that operate in higher level risk areas will be expected to have the documented process more clearly defined to show how HSE performance is considered along with other inputs when considering new or expanded business plans.
- e. Some organizations involve senior HSE professionals in the business planning processes who advise on the potential impact on HSE performance.

4.2 STOW-TT Minimum HSE Requirement Statement 4.2

Company-wide measurable HSE goals and targets are set and documented

4.2.1 Guidance

- a. In this context a target is something the organization expects to achieve in the short to medium term and goals are something they aim to hit in the longer term.
- b. HSE targets are usually seen as reasonably achievable; HSE goals often take a bit of persuasion to convince people they are achievable.
- c. Examples of HSE Targets are:
 - i. The company will reduce the Accident frequency rate by 30% over the next twelve months
 - ii. The company will train 80% of the personnel in risk assessment processes in the next twelve months
 - iii. The company will maintain the record of no days away from work injury cases for the next twelve months

- iv. The company will involve 80% of the workforce in HSE meetings once per month
- v. The company will become ISO 14000 certified within twelve months
- d. Using the same targets and expressing them as goals, examples are:
 - i. The company believes that it can eradicate all accidents from our operations
 - ii. All personnel will be trained in the risk assessment process before being allowed to work on any company operated site
 - iii. Days away from work incidents will not occur on company operated sites
 - iv. All members of the workforce will play an active part in HSE meetings that are held on every company location each month
 - v. The company will receive the industry's highest award for achieving exemplary environmental management
- e. The senior management of a company should set HSE targets based on review of historical performance data that sets a reasonable expectation of being scored while demonstrating a need for continuous improvement.
- f. In setting the targets, they should be defined in such a way that unambiguous measurement can be demonstrated.
- g. The frequency with which HSE targets are set should allow sufficient time for measured, consistent improvement to be assured. Many organizations find annual HSE target setting, based on the previous years' HSE performance as being the most reliable method to measure improvement.
- h. HSE goals may be longer term aims, but the organization should set them, document them and measure the performance against the targets set.
 - i. Organizations that have documented, measurable HSE goals and targets will meet this requirement where they can demonstrate the continued reporting and measuring against them.

4.3 STOW-TT Minimum HSE Requirement Statement 4.3

HSE Plan to consist of the following components:- Organizational Chart – Roles and Responsibilities

4.3.1 Guidance

- a. An HSE plan is a documented plan that describes how the HSE Policies and procedures included in the HSE Management System are to be achieved.
- b. The Organizational chart will show the key personnel and/or groups of personnel that have responsibility for implementing the HSE Policies and Procedures associated with the HSE Management System.

- c. In a simply structured organization, the organizational chart may be a single paged document that sets out a tiered structure of personnel or job positions that have the responsibility for some or all of the HSE plan.
- d. In a more complex organization, or in organizations that work in higher level risk environments, with complex risk portfolios, the organizational chart may be a set of layered charts that describe the different roles of key personnel or groups of personnel throughout the organization.
- e. A common mistake of organizations is to use an organizational chart that explains the corporate structure of the organization. An effective HSE plan calls for an organizational chart that is clearly and specifically designed to identify the key HSE roles that people or groups of people have in the organization.
- f. In meeting this minimum requirement, organizations will have a documented, up to date HSE plan that includes an organizational chart that clearly identifies the roles of individuals or groups of individuals in making the HSE plan work.
- g. The second aspect of meeting this minimum requirement is the provision of documented roles and responsibilities of individuals that have accountability for making the HSE plan work.
- h. Once again this is different from the standard job description roles and responsibilities that individuals are given in their employment contracts.
- i. The HSE roles and responsibilities within an HSE plan should clearly identify the specific accountabilities the individual has under the HSE plan.
- j. The organization will meet this minimum requirement when their HSE plan includes a set of documents that clearly outline the roles and responsibilities of each person identified in the Organizational Chart that is included in the HSE plan.

4.4 STOW-TT Minimum HSE Requirement Statement 4.4

Procedures exist for job activities associated with services provided – these show how HSE will be managed inclusive of stopping unsafe work

4.4.1 Guidance

- a. The way in which procedures for job activities are documented and communicated are varied. Some examples are:
 - i. Work Plans
 - ii. Work Procedures
 - iii. Trade Specific Procedures
 - iv. Job Safety analysis sometimes describe the way in which work is to be carried out

- v. Control of work systems, such as a Permit to Work, sometimes describes how work is to be carried out
- vi. Method Statements
- b. Whichever way an organization documents the way in which job activities are to be carried out, this minimum requirement expresses a need for those procedures to clearly explain the job steps to be taken, the way in which personnel will be kept safe from harm and identifies the right or responsibility of individuals to stop work that is unsafe.
- c. The explanation of how to stop work that is unsafe is to some extent addressed in requirement 1.9 and for some organizations this is all that may be required to meet the minimum expectation.
- d. In organizations that are involved in complex, higher level risk operations, the method in which work that is unsafe during specific work activities should be clearly documented so as to ensure the act of stopping the work is not in itself unsafe.

4.5 STOW-TT Minimum HSE Requirement Statement 4.5

Resumes of all critical personnel (Managers, Supervisors, foremen, HSE advisors, specialists etc)

4.5.1 Guidance

- a. In order to meet this minimum requirement, an organization will first need to show that they have a system in place that identifies the critical personnel in their organization.
- b. The resumes of the critical personnel should contain sufficient information to reasonably explain the qualifications and experience they have that makes them suitable persons to be appointed to the critical position they hold.
- c. Where organizations are involved in higher risk or technically complex operations, it may be required that the organization demonstrates the method in which they have verified that the resume of the individual is an accurate reflection of the qualifications and experience of the person to which it relates.
- d. It may also be required that the organization show the internal criteria that they require critical position holders to have prior to selection and then to be able to match that criteria to the resumes of the critical personnel they employ.
- e. In those organizations involved in the highest level of risk activity, there may be a requirement for the organization to demonstrate a system that prevents multiple critical positions to be held by newly promoted or newly employed personnel in order to maintain a balance of experience, competence and personnel development.

4.6 STOW-TT Minimum HSE Requirement Statement 4.6
Method Statement (this should be tied directly to STOW-TT Minimum HSE Requirement 6.3)

4.6.1 Guidance

- a. In tying this minimum requirement to the one referenced in 6.3, this relates to the asset specific equipment and personnel control plan. The intent of this is to ensure that the method statement addresses the possibility of new personnel using equipment they are unfamiliar with.
- b. A Method Statement is expected to provide a sequence for carrying out specific tasks within a job work scope. This is required where the sequence in which specific tasks must be done is critical to the safety of the overall operation.

Examples of where this occurs are:

- i. During demolition operations
 - ii. Handling hazardous chemicals
 - iii. Construction activities involving scaffolding
 - iv. Confined space entry
 - v. Decommissioning activity
- c. Some organizations refer to Method Statements as risk assessments, however the Method Statement is expected to contain more detail than a risk assessment.
 - d. Organizations that need to use Method Statements will meet this minimum requirement when the process for developing the Method Statement includes:
 - i. The name of the originator and the date it was originated
 - ii. The named person or persons who will be responsible for the entire operation and for compliance with the Method Statement
 - iii. The named key personnel who are responsible for critical activities
 - iv. The training requirements of personnel who have functions that need to demonstrate competence requirements. (Testing engineers, Coded Welders, Well control specialists, etc.)
 - v. Details of safe access and egress routes along with the method for ensuring emergency routes will be properly maintained
 - vi. Details of equipment that is required, including the weight, size, power rating and the need for any certification associated with the equipment
 - vii. The location, means of ensuring stability of any lifting equipment that is to be used
 - viii. Identification of the material storage, transportation and security issues

- ix. Detailed work sequence including risk assessment and risk control measures
 - x. Details of personal protective equipment and any other engineering control that is required, such as ventilation, gas detectors, etc.
 - xi. Identification of environmental limitations such as wind speed, rain or temperature
 - xii. The measures to be adopted to protect third parties not involved in the operations
 - xiii. The method in which any variation to the method statement will be authorized
- e. Some organizations have designed control of work systems to meet the method statement requirements and where this is the case, they will have met the minimum requirement.

5 Guidance - Element 5: HSE Competency and Training

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

5.0.1 Guidance

a. Organisations that have a training programme including a matrix that is based on their service risk, will have demonstrated compliance to this element. The programme must address worker exposure and must include permanent and temporary workers. Training records shall include assessments where applicable. Examples – Catalyst Services – SCBA training; inert gas entry confined space training; emergency response for inert gas entry.

5.1 STOW-TT Minimum HSE Requirement Statement 5.1 ***Control of Work***

5.1.1 Guidance

- a. Organizations that operate in the lowest risk activity areas may not use or have a formal Control of Work System documented. Where this is the case, it will be sufficient for the organization to explain the effective method in which they control work in their low risk activities.
- b. Most organizations operating in higher level of risk activity will need to demonstrate a documented control of work system.
- c. The amount of detail and complexity of the control of work system used by organizations should be relative to the risk activity of the organization.
- d. All organizations will need to show how they ensure all personnel are properly trained in the control of work methods they use.
- e. Organizations that tend to carry out their high risk activities at sites they do not control, will be expected to demonstrate how they communicate to their employees the need to ask for assistance in documenting and following the control of work processes operated on the sites they work on.
- f. Where organizations carry out internal training in the control of work systems they use, this will meet the minimum requirement where they are able to demonstrate:
 - i. The date, time and location of the training provided
 - ii. The names of the people trained
 - iii. The training results in an internal/external certificate of competency being issued
 - iv. The training programme contents are available for review
 - v. The training programme appears adequate to meet the requirements of the organization's system

- g. Where organizations use external training providers to train personnel in their control of work system, the approval process for selecting the training organization will be reviewed and should demonstrate suitability to meet the system competency requirements.

5.2 STOW-TT Minimum HSE Requirement Statement 5.2
Risk Assessment – Job Hazard Analysis

5.2.1 Guidance

- a. Where organizations are involved only in low risk activity, they will meet this minimum requirement when they are able to demonstrate the method of assessing competence of their personnel to assess the risks associated with the work they do and show the method of documenting this.
- b. There is a requirement for organizations to show how the general workforce are trained and exposed to the risk assessment methods used by the organization.
- c. There is a requirement for organizations to show how the supervision and management personnel that authorize the use of completed risk assessments are trained and their experience level determined to make them competent to make such an authorization.
- d. Where organizations carry out internal training in the control of work systems they use, this will meet the minimum requirement where they are able to demonstrate:
 - i. The date, time and location of the training provided
 - ii. The names of the people trained
 - iii. The training results in an internal/external certificate of competency being issued
 - iv. The training programme contents are available for review
 - v. The training programme appears adequate to meet the requirements of the organization's system
- e. Where organizations use external training providers to train personnel in their risk assessment processes, the approval process for selecting the training organization will be reviewed and should demonstrate suitability to meet the system competency requirements for each of the risk assessment processes described in the organization's HSE management System.
- f. Organizations that carry out their higher risk activity at work sites they do not control, may be asked to demonstrate the method in which they communicate the need for their workforce to ask for assistance in following the risk assessment process used by the organization that controls the work site, or for their personnel to attend specific training in those processes.

5.3 STOW-TT Minimum HSE Requirement Statement 5.3
Emergency Response

5.3.1 Guidance

- a. All organizations are expected to have an emergency response plan.
- b. The detail of that plan will be appropriate to the level of risk activity that the organization operates in.
- c. In order to meet this minimum requirement, the organization will be required to show how they communicate the details of the emergency response plan to their employees.
- d. Where personnel have specific duties under the emergency response plan, organizations will be required to show evidence of training the allocated personnel for the roles that they are expected to play.
- e. Where organizations carry out internal training in the emergency response plan, this will meet the minimum requirement where they are able to demonstrate:
 - i. The date, time and location of the training provided
 - ii. The names of the people trained
 - iii. The training results in an internal/external certificate of competency being issued
 - iv. The training programme contents are available for review
 - v. The training programme appears adequate to meet the requirements of the organization's system
- f. Where organizations use external training providers to train personnel in their emergency response plans, or aspects of the emergency response plans, the approval process for selecting the training organization will be reviewed and should demonstrate suitability to meet the system competency requirements.
- g. The type of training that may be provided in support of the emergency response plans are:
 - i. Use of the type of fire-fighting equipment provided by the organization
 - ii. Medical training to a level appropriate for the risk and nature of activity carried out by the organization
 - iii. Command and control training for personnel that are expected to lead the response to an emergency

5.4 STOW-TT Minimum HSE Requirement Statement 5.4
Defensive Driving

5.4.1 Guidance

- a. All organizations that use vehicles to transport employees, or where they provide vehicles for employees to use, or where they fund the use of a personal vehicle by employees for company business will be required to meet this minimum standard.
- b. All drivers of vehicles in the above category are required to have undergone defensive driving training prior to being allowed to drive vehicles on company business.
- c. Organizations will be required to show a register of the company authorized drivers and to maintain a register of the defensive driving training they have undergone.
- d. Where organizations are involved in high mileage operations, there may be a further requirement for individual drivers to be asked to produce their certification for defensive driving.
- e. Where organizations carry out internal training in defensive driving, this will meet the minimum requirement where they are able to demonstrate:
 - i. The date, time and location of the training provided
 - ii. The names of the people trained
 - iii. The training results in a certificate of competency being issued
 - iv. The training programme contents are available for review
 - v. The training programme appears adequate to meet the requirements of the organization's system
 - vi. The competency of the trainer to teach defensive driving can be evidenced
- f. Where organizations use external training providers to train personnel in their defensive driving system, the approval process for selecting the training organization will be reviewed and should demonstrate suitability to meet the system competency requirements.

5.5 STOW-TT Minimum HSE Requirement Statement 5.5
Accident prevention and reporting

5.5.1 Guidance

- a. All organizations are required to have a documented system to report all accidents and to provide employees with information on accident prevention.
- b. In meeting the requirement for accident prevention, an organization will meet the minimum requirement when they demonstrate the method in which they

communicate the accident prevention programme to employees and that they record the employees that have received such information.

- c. Trinidad and Tobago legislation requires employees to cooperate with employers in anything that the employer is required to do in order to provide a safe place of work. The employer has a duty to report certain accidents and therefore all employees have a legal duty to report accidents in the workplace to their employer.
- d. At the lowest level of risk activity, organizations will be required to show that they have effectively communicated the legal requirement for employees to report accidents in the workplace to them.
- e. Where organizations are involved in higher levels of risk activity, they will need to show they have a policy that is effectively communicated to their employees that requires them to report all accidents and incidents they are involved in, witness or otherwise come to know about.
- f. Where organizations carry out internal training or awareness sessions in accident prevention and accident reporting, this will meet the minimum requirement where they are able to demonstrate:
 - i. The date, time and location of the training or awareness session provided
 - ii. The names of the people who were trained or attended the awareness session
 - iii. The training results in a certificate of competency being issued, or the awareness session results in a certificate of attendance
 - iv. The training programme or awareness session contents are available for review
 - v. The training programme or awareness session content appears adequate to meet the requirements of the organization's system
- g. Where organizations use external training providers to train personnel in their accident prevention and accident reporting system, the approval process for selecting the training organization will be reviewed and should demonstrate suitability to meet the system competency requirements.

5.6 STOW-TT Minimum HSE Requirement Statement 5.6 ***Environmental Awareness.***

5.6.1 Guidance

- a. All organizations are expected to have a documented policy with respect to the minimization of the impact on the environment.

- b. This minimum requirement expects that at the lowest level of risk activity, organizations will effectively communicate that policy to their employees and keep a record of the method in which they communicated it to them.
- c. Where organizations are involved in higher risk activity, especially where the risk involves potential harm to the environment, they are expected to have more robust policies and procedures that are effectively communicated to employees.
- d. In order to meet this minimum requirement, organizations will be required to demonstrate the communication methods they use to ensure all employees are aware of their responsibility for the minimization of environmental impact.
- e. Many organizations have adopted voluntary standards that lead to ISO 14000 certification and where this is the case, it will be sufficient for organizations to show their current certification and the associated records with respect to employee training and awareness.
- f. Where organizations carry out internal training or awareness sessions in the environmental awareness programme, this will meet the minimum requirement where they are able to demonstrate:
 - i. The date, time and location of the training or awareness session provided
 - ii. The names of the people trained or who attended the awareness session
 - iii. The training results in an internal/external certificate of competency or awareness sessions result in attendance certificates being issued
 - iv. The training programme or awareness session contents are available for review
 - v. The training programme or awareness session appears adequate to meet the requirements of the organization's system
- g. Where organizations use external training providers to train personnel in their environmental awareness programme, the approval process for selecting the training organization will be reviewed and should demonstrate suitability to meet the system competency requirements.

5.7 STOW-TT Minimum HSE Requirement Statement 5.7
Hazardous Communication

5.7.1 Guidance

- a. Hazardous communication deals with ensuring that organizations provide sufficient information to employees with respect to the hazards associated with any harmful substances that are used or may be present in the work place.

- b. All organizations are required to demonstrate they have systems in place that meet the Trinidad and Tobago legislative requirements with respect to the safe storage, use, transportation and disposal of harmful substances.
- c. In order to meet this minimum requirement, organizations will be required to demonstrate the effective system they have in place for communicating to all relevant employees the safe methods required to handle, store, use and dispose of each harmful substance they hold on their location/s
- d. Where organizations carry out internal training or awareness sessions in the Hazard Communication process they use, this will meet the minimum requirement where they are able to demonstrate:
 - i. The date, time and location of the training or awareness session provided
 - ii. The names of the people trained or who attended the awareness session
 - iii. The training results in a certificate of competency being issued or the awareness session results in an internal/external certificate of attendance being issued
 - iv. The training programme or awareness session contents are available for review
 - v. The training programme or awareness session appears adequate to meet the requirements of the organization's system
- e. Where organizations use external training providers to train personnel in their hazard communication process, the approval process for selecting the training organization will be reviewed and should demonstrate suitability to meet the system competency requirements.

5.8 STOW-TT Minimum HSE Requirement Statement 5.8
(Personal Protective Equipment) PPE

5.8.1 Guidance

- a. All organizations are required to have a PPE policy and procedure that meets the Trinidad and Tobago legislative requirements.
- b. In order to meet this minimum requirement, organizations will be required to demonstrate the method in which they train their employees to correctly use and maintain the PPE they provide for use in their workplace.
- c. It is expected that organizations will maintain a register of the training or information they give to their employees in order to assure them that the PPE will be used and maintained correctly.

- d. Where organizations carry out internal training instructing employees on the correct use and maintenance of the PPE issued, this will meet the minimum requirement where they are able to demonstrate:
 - i. The date, time and location of the training provided
 - ii. The names of the people trained
 - iii. The training results in a certificate of competency being issued
 - iv. The training programme contents are available for review
 - v. The training programme appears adequate to meet the requirements of the organization's system
- e. Where organizations use external training providers to train personnel in their use and maintenance of PPE process, the approval process for selecting the training organization will be reviewed and should demonstrate suitability to meet the system competency requirements.

5.9 STOW-TT Minimum HSE Requirement Statement 5.9

New employee inductions

5.9.1 Guidance

- a. All organizations are expected to have a system in place that ensures all new employees, or those transferred from other work sites are provided with sufficient initial information to enable them to work in a safe way. This process is referred to in these minimum requirements as induction training.
- b. The extent and detail of the induction training process will be relative to size, complexity and level of risk activity that the organization is involved in.
- c. All induction processes will provide the employee with:
 - i. An overview of the organization's safety policy and procedures with emphasis on the specific areas that relate to the new employee's area of work
 - ii. The safety philosophy of the organization. (That accidents can be prevented, must be reported, employee is responsible for own safety in support of management's overall responsibility for providing a safe place of work)
 - iii. The nature of any local, national or organizational rules and the disciplinary process for violating them
 - iv. The role of supervisors and management in supporting HSE policy and procedures
 - v. The rules for wearing of PPE

- vi. The rules for reporting of all accidents and incidents no matter how trivial
 - vii. Fire and other relevant emergency procedures
 - viii. Welfare and amenities provision
 - ix. Arrangements for consultation with employees on the HSE aspects of the working environment
- d. Where organizations carry out internal induction training, this will meet the minimum requirement where they are able to demonstrate:
- i. The date, time and location of the training provided
 - ii. The names of the people trained
 - iii. The training results in an internal/external certificate of attendance being issued
 - iv. The training programme contents are available for review
 - v. The training programme appears adequate to meet the requirements of the organization's system
- e. Where organizations use external training providers to deliver induction training, the approval process for selecting the training organization will be reviewed and should demonstrate suitability to meet the system competency requirements.
- f. Where organizations are involved in higher risk activity levels, there may be a requirement to show how the induction training is updated and communicated to existing employees at a regular frequency.
- g. Some organizations provide annual induction awareness/refresher training for all personnel.

5.10 STOW-TT Minimum HSE Requirement Statement 5.10

Tropical Basic Offshore Safety Induction & Emergency Training – (T-BOSIET)

5.10.1 Guidance

- a. Organizations that do not work in the offshore energy sector are not obliged to meet this minimum requirement.
- b. Organizations that work in areas that involve personnel travelling offshore to work are required to demonstrate that their personnel meet the minimum requirement for training in basic offshore safety induction and emergency training for tropical climates.
- c. The operating companies of Trinidad and Tobago will always accept the OPITO approved T-BOSIET certification as evidence that employees meet this requirement.

- d. In line with the guidance provided here, it is important to note that meeting this minimum requirement does not in itself require the Operating Companies to allow organizations to travel offshore to sites they control.
- e. Without the commitment to providing T-BOSIET Training, organizations may not be considered for supplying services to Operating Companies that involve travel offshore.
- f. Many Operating Companies require contracting organizations to train their personnel in site specific requirements, prior to being allowed on site and this is equally applicable to on and offshore Operating Company sites.
- g. For Example before allowing personnel onto the work site, Operating Companies may require contracted organizations to train, or make their employees available for training in:
 - i. Permit to work Systems that are used on the work site
 - ii. Risk assessment processes that are used on the work site
 - iii. Behavioural based safety techniques that are used on the work site
 - iv. Emergency Response roles that contracted organization employees are required to perform on the site

5.11 STOW-TT Minimum HSE Requirement Statement 5.11 **Confined Space Training**

5.11.1 Guidance

To meet this minimum requirement, organizations shall ensure that workers who enter spaces, undergo thorough and suitable Confined Space Training. Training of this nature should be conducted by a competent trainer with both the knowledge and experience of confined space work hazards. Training must cover:

1. The legal aspects of confined space
2. What defines Confined Spaces and Entry
3. Types of confined space hazards including
 - a. Atmospheric Hazards
 - b. Entry and exit hazards
 - c. Hazardous energy
 - d. Hazards of the work being done in the CSE
 - e. Physical Safety hazards; noise, configuration etc
 - f. Fire Hazards

4. Types of other hazards (not directly related to space that may impact on space)
5. Atmospheric conditions and testing
6. Confined Space Hazard Controls
7. Safety Watch; Attendant; Supervisor and rescue responsibilities
8. Personal Protective Equipment
9. Permit to work systems

5.12 STOW-TT Minimum HSE Requirement Statement 5.12

SCBA/Respirator Training

5.12.1 Guidance

To meet this minimum requirement, organisations shall ensure that workers who are required to wear respirators including Self Contained Breathing Apparatus (SCBA) shall be adequately and suitably trained. Training shall include:

- a. Requirements for use of breathing air and or respirators
- b. IDLH and Toxic Environments
- c. Limitations of using breathing air and respirators
- d. Purpose of the alarms on the breathing air systems

Training on this topic must be part of a respirator programme that includes fit testing on the respirator as well as medical fitness for use of a respirator/SCBA (This is mandatory for this type of risk).

5.13 STOW-TT Minimum HSE Requirement Statement 5.13

Fall protection/ Fall Prevention Training

5.13.1 Guidance

To meet this requirement, organisations shall ensure that workers who are required to work at height on both temporary and permanent platforms are at minimum trained in:

- a. Fall protection requirements
- b. Personal fall arrest systems (use; fit; limitations)
- c. Rescue for fall at heights
- d. Dropped object management

5.14 STOW-TT Minimum HSE Requirement Statement 5.14

First Aid/CPR Training

5.14.1 Guidance

To meet this minimum requirement, organisations shall ensure that workers who work in remote areas or electrical service are trained in first aid/CPR. Training shall only be done by a training body authorised to conduct this type of training. First Aid/CPR training attendees shall be able to:-

- 1) Recognize the need for first aid training.
- 2) Identify the goals of first aid.
- 3) Identify legal considerations when providing first aid.
- 4) Identify the actions that a bystander should take in an emergency.
- 5) Describe the steps in performing a scene survey.
- 7) Identify situations in which EMS should be called.
- 8) Demonstrate ability to contact EMS personnel
- 9) Identify ways to minimize the chance of disease transmission.
- 10) Describe when and how to perform Basic Life Support (BLS) for an adult, child, and infant.
- 11) Demonstrate BLS for an adult, child, and infant.
- 12) Describe when and how to provide first aid for a choking adult, child, and infant.
- 13) Demonstrate how to provide first aid for a choking adult, child or infant.
- 14) Demonstrate how to provide first aid to stop bleeding and apply splints.
- 15) Describe when and how to provide basic first aid for:
 - a) Internal and external bleeding
 - b) Bone, Joint, and Muscle Injuries
 - c) Head & Spinal Injuries
 - d) Other Serious Injuries
 - e) Burns
 - f) Shock
 - g) Sudden Illness
 - h) Allergic Reactions
 - i) Poisoning

- j) Heat and Cold Injuries
- k) Rescuing and Moving Victims

5.15 STOW-TT Minimum HSE Requirement Statement 5.15

Banksman Training

5.15.1 Guidance

To meet this minimum requirement, organization that require workers to bank vehicles, forklifts and cranes shall have the appropriate training for each of area where they require banksmen. The training required for a crane banksman is more detailed and specific to that type of equipment. Training of this nature shall include signalling signs; signalling from a safe location, equipment movement etc.

5.16 STOW-TT Minimum HSE Requirement Statement 5.16

Hot Work Safety

5.16.1 Guidance

To meet this requirement, organizations that require workers to conduct hot work including welding, cutting, grinding, shall provide suitable and thorough training for this risk work. Training shall include;

- a. Hot Work as it applies to the workplace;
- b. Recognition of potential hazards associated with hot work including flammable and combustible material.
- c. Hazard reduction/control measures to manage hot work hazards
- d. Role and responsibilities of the fire safety watch

6 Guidance - Element 6: Security

6.1 STOW-TT Minimum HSE Requirement Statement 6.1 ***Organizational Data Base – employee address, photo, age, last place of employment.***

6.1.1 Guidance

- a. In order to meet this minimum requirement, all organizations will need to be able to demonstrate that they have a process in place for establishing and maintaining a database that provides:
 - i. The current residential address of each employee
 - ii. A picture of each employee that is verified as being a true likeness by an officer of the organization that employs them
 - iii. The age of the employee that has been verified
 - iv. The name and address of the employer that immediately preceded the current employer
- b. It is acceptable for organizations to maintain this database electronically, however where this is the method chosen, it must be available to relevant personnel within the organization.
- c. Where organizations are involved in higher levels of risk activity, the Independent Assessor may carry out some testing of the validity and effectiveness of the database established by the organization.

6.2 STOW-TT Minimum HSE Requirement Statement 6.2 ***Evidence of Background Character Check – (Character Check Register).***

6.2.1 Guidance

- a. All organizations need to demonstrate a documented process for carrying out background character checks on employees, where applicable, prior to employment, or within six months of employing a temporary or probationary employee.
- b. Organizations that operate in the higher risk areas of the industry will be required to carry out background checks prior to employment of personnel on the higher risk activity work sites. The type of site this includes are:
 - i. Hydrocarbon processing facilities
 - ii. Drilling rigs
 - iii. Hydrocarbon carrying marine vessels or road transport cargo vehicles

- iv. Work sites that supply plant and/or equipment, including tools to hydrocarbon processing facilities or drilling rigs
- v. Work sites that carry out commercially sensitive analysis of product, equipment, samples or geological/geographic formations
- c. Background checks on Trinidad and Tobago nationals must include a check with local police authorities.
- d. Where a Work Permit process involves a foreign employee providing the Work Permit Committee with a police report from the country of residence, organizations will be deemed to have met the minimum requirement for a police background check.
- e. In addition to a police background check, organizations are expected to make one or more independent background checks on employees. The extent to which this is carried out must be relevant to the level of risk activity the organization that employs the person operates in. The additional background checks may reasonably include:
 - i. Consultation with one or more previous employers
 - ii. Consultation with one or more character referees that are known persons of good standing that have personally known the individual for a period in excess of five years

6.3 STOW-TT Minimum HSE Requirement Statement 6.3 ***Equipment and Personnel Control Plan (Asset Specific).***

6.3.1 Guidance

- a. An equipment and personnel control plan will provide an organization with an up to date understanding of the location, use and condition of all of the safety critical equipment that they own and the location and skills of the personnel that they employ.
- b. Within this minimum requirement, the security aspect of understanding equipment location and use is to enable organizations to prevent loss through theft or damage through misuse.
- c. The level of detail and complexity of recording the location and use of each piece of plant or equipment that an organization owns will vary depending on the extent of business interruption that loss or damage to the equipment may cause. Some examples of the areas that the equipment control plan may address are:
 - i. The location of the equipment
 - ii. The value of the equipment

- iii. Ownership registration details for the equipment
 - iv. Maintenance records of the equipment
 - v. A commercial risk assessment of the impact of loss or damage to the equipment
 - vi. Up to date information regarding the time that the equipment is expected to remain at the current location
 - vii. An alert system for advising appropriate personnel when the equipment is not in the expected location
- d. The personnel control plan is required under this minimum requirement in order that organizations know where their personnel are located, how long they expect them to be at that location and to identify the personnel that may be involved or affected by an incident at a remote location.
- e. The personnel plan to meet this minimum requirement may need to address any combination or all of the following:
- i. The name, age, date of birth and job title of the individuals
 - ii. The location of the individual
 - iii. Where the person is expected to be at any particular period of the work day or work cycle
 - iv. Contact details for the individual
 - v. Contact details for the relatives or next of kin of the individual
 - vi. An alert system that provides timely warning when the individual is not present at the expected location
 - vii. Journey plans that record details of individuals or groups of individuals travelling on business related activity

7 Guidance - Element 7: Health and Hygiene

7.1 STOW-TT Minimum HSE Requirement Statement 7.1 Substance Abuse Management Policy

7.1.1 Guidance

- a. Trinidad and Tobago legislation requires employees not to be under the influence of any intoxicant while at work to the extent where they may endanger their own safety or that of others, where intoxicant is defined as any alcohol, medicament, narcotics or psychotropic substance.
- b. All organizations will be required to have a documented Substance Abuse Management Policy that provides for legally compliant processes that inform the employee of:
 - i. The Organization's policy with respect to the use of prohibited substances including alcohol and/or drugs
 - ii. The Organization's definition of substance abuse as covered in the policy
 - iii. What the organization considers to be a violation of the Substance Abuse Policy
 - iv. What process or processes the organization may use to test for substance abuse
 - v. What process or processes the organization will use to handle violations of the substance abuse policy
- c. Where organizations are involved in higher risk activities, they may be required to include a process that allows for both random and with cause substance abuse testing of personnel.
- d. Where organizations are likely to work on multi-organization work sites that are not under their control, they will be expected to include in their policy that the Management may agree to allow the substance abuse management policy of the site control organization to be used in place of the organization's substance abuse management policy.
- e. All organizations will be required to demonstrate that they have effectively communicated the substance abuse management policy of their organization to all employees.
- f. Where an organization is likely to become a site controlling organization, they may be required to demonstrate how they will effectively communicate their substance abuse management policy to contractors and third party personnel that work on the site they control.

7.2 STOW-TT Minimum HSE Requirement Statement 7.2

Fit for work: (UKOOA) Medical or equivalent

7.2.1 Guidance

- a. The UKOOA Medical assessment is internationally recognised as being robust in support of certifying remote location workforce personnel as being fit to work.
- b. All organizations will be required to ensure that employees who are required, undergo medical exam by a certified physician who endorses the medical fit to work certificate as “Fit to work”.
- c. Where organizations are involved in higher risk activity the rigour with which the medical advisor is required to provide the “Fit to work” assessment will increase.
- d. All organizations shall ensure that any young person who will be employed for a period of three months or more, is examined by a medical practitioner who will ascertain his fitness for work in the organization.
- e. All organizations shall adapt the working arrangements of pregnant and nursing mothers to ensure that the environment is not dangerous to the health and safety of both.
- f. All organizations shall ensure that any employee returning to work after extended sick leave produces a medical certificate from a certified medical practitioner attesting that he is fit to work.
- g. The minimum requirement for all offshore workers to be given a medical examination that meets the standard of the UKOOA Medical guidelines will need to be met.
- h. The UKOOA medical examination guidelines are available from the UKOOA web site for a fee, and organizations that are required to provide this level of medical examination will be required to show they have understood the extent of the medical examination required.
- i. The UKOOA Web site is: <http://www.ukooa.co.uk>
- j. A list of qualified doctors registered in Trinidad and Tobago can be found at: <http://www.ukooa.co.uk/issues/health/doctors-list.cfm>.

7.3 STOW-TT Minimum HSE Requirement Statement 7.3

Plan to protect employees from work related health hazards

7.3.1 Guidance

- a. All organizations are required to show that their HSE Management system and procedures require the development of a Health Risk Management Plan.

- b. The detail and complexity of the Health Risk management plan required will be dependent upon the level of risk and number of people exposed to the risk that arise from the activities of the organization.
- c. At the lowest level, organizations will be required to show that they have carried out a Health Risk Assessment that considers risk to health from:
 - i. Hazardous Chemicals
 - ii. Noise
 - iii. Vibration
 - iv. Ionising Radiation
 - v. Extremes of Temperature
 - vi. Hazardous micro-organisms
 - vii. Stress
 - viii. Repetitive motion sprains and strains
- d. Where organizations document that they have considered these risks and the type of operation activity does not identify any risk that requires further control, then they will have met the minimum requirement.
- e. Most organizations are likely to identify some risk to health that will indicate that something needs to be done to reduce the risk level or provide suitable control of the risk.
- f. In order to meet this minimum requirement, organizations will need to show:
 - i. The risk is identified
 - ii. Suitable steps to identify how to control the risk
 - iii. The steps identified are implemented
 - iv. The implemented steps are monitored for effectiveness

7.4 STOW-TT Minimum HSE Requirement Statement 7.4

Employees have access to adequate medical and first aid services

7.4.1 Guidance

- a. All organizations must be able to demonstrate that their HSE management systems and procedures provide for the legislative requirements of Trinidad and Tobago in as much as they relate to the provision of access to adequate medical and first aid services and equipment.
- b. Where organizations are involved in higher levels of risk activity, there will be an increasing requirement for demonstrating that their employees have suitable

access to demonstrably competent and adequately resourced medical and first aid facilities.

- c. Examples of the range of services that organizations may need to provide for are:
 - i. Trained and certified first aid or first responder personnel
 - ii. Access to organization appointed nurse and/or doctor where appropriate
 - iii. Medical equipment that is reasonably able to be used to treat persons that become ill or injured while at work
 - iv. Arrangements for the transportation and/or treatment of ill or injured personnel by appropriate levels of medical practitioners at appropriately equipped medical facilities
- d. Most organizations that operate at onshore locations will meet this requirement when:
 - i. A suitable number of trained first aid personnel are always present on site when personnel are at work
 - ii. The trained first aid personnel have access to medical equipment that they know how to use
 - iii. The organization has an emergency response plan that includes the alerting of external medical aid agencies to assist them and/or they have a plan to transport ill or injured workers to the higher level medical facilities
- e. Organizations that operate mostly at offshore locations as part of a multi-organization site will need to show their arrangements for transport from the offshore location to the receiving medical facility.
- f. Where organizations operate as site controllers of the offshore facilities, they will be required to show how they provide the trained and competent level of medical personnel on site and provide adequate equipment for use by those staff.

8 Guidance - Element 8: Environmental Management

8.1 STOW-TT Minimum HSE Requirement Statement 8.1 ***Environmental Policy***

8.1.1 Guidance

- a. All organizations are required to demonstrate that they have a general policy statement on the commitment of management to minimizing the impact their activities have on the environment.
- b. Where an organization operates in the lower risk levels and is unlikely to have significant impact on the environment, it will be acceptable for this management statement to be included within the organization's general HSE Policy statement.
- c. Organizations that carry out operations of a type and nature where there is a potential to significantly impact the environment, are expected to have dedicated environmental policy statements, endorsed by senior management.
- d. Organizations that have demonstrable current certification of their Environmental Management System, such as ISO 14000, are likely to meet all the sections of this element of the Minimum Requirements.
- e. Organizations may be reviewed or asked to demonstrate the effective methods they use to communicate the environmental policy statement.
- f. Organization shall ensure that significant environmental aspects are taken into consideration in establishing, implementing and maintaining their environmental management system.

8.2 STOW-TT Minimum HSE Requirement Statement 8.2 **Identify environmental aspects (in accordance with legislative requirements)**

8.2.1 Guidance

- a. Organizations must demonstrate that suitable environmental assessments have been completed by competent personnel to determine the aspects that can have significant impact on the environment. Organization must demonstrate the implementation and maintenance of suitable control measures to mitigate the environmental impacts identified.
- b. Organizations that have minimal impact on the environment will meet this minimum requirement when they are able to show that they have considered the significant environmental aspects of their operations.
- c. The organizations that have recognized they have little impact on the environment, are required to have a documented requirement to cooperate with other

organizations that they may work with, as part of multi-organization work teams who do have a requirement to operate an environmental management programme.

- d. Organizations that are involved in operations that may have some significant impact on the environment, are required to document, probably through use of a register, the significant environmental aspects that their operations may impact on.
- e. All organizations are expected to have a documented approach to working with multi-organizational teams in order to provide assurance that the various environmental aspects of all involved organizations will reasonably be identified.

8.3 STOW-TT Minimum HSE Requirement Statement 8.3 **Register of environmental legislative requirements**

8.3.1 Guidance

- a. At the lowest level of risk, all organizations are required to hold a copy (electronic or hard copy) of the Trinidad and Tobago Environmental Management Act in their HSE Management system documentation which can be found at: www.ttenvironmentalcommission.org/legislation.htm. They are also required to maintain a basic impact and aspect assessment covering their activities.
- b. Where organizations operate in higher levels of operation that present risk to the environment they will be required to show that they have reviewed the legislation and identified the duties that apply to them.
- c. It is expected that organizations will maintain appropriate registers that demonstrate the different legislative requirements that they understand their organization is required to comply with.

8.4 STOW-TT Minimum HSE Requirement Statement 8.4 **Environmental Management Program including ERP**

8.4.1 Guidance

- a. Organizations that have identified they have little impact on the environment through their normal operations, do not need to develop environmental management programmes or environmental management plans. A basic impact and aspect assessment covering their activities should be sufficient.
- b. Those organizations that are identified as not needing to develop environmental management programmes or plans are expected to include a statement within their HSE Management system documentation to the effect that they will cooperate with others that have developed environmental management programmes where appropriate.

- c. For organizations that have identified the need to develop an environmental management programme, it is expected that this will be a documented programme that is supported by an environmental management plan.
- d. Where organizations adopt the structure and approach of the ISO 14000 standard for environmental management programmes, whether or not they are registered as ISO 14000 organizations, it is likely they will meet this minimum requirement.

8.5 STOW-TT Minimum HSE Requirement Statement 8.5
Clearly defined roles and responsibilities to support EMS

8.5.1 Guidance

- a. Organizations that have identified they have little impact on the environment through their normal operations, do not need to develop roles and responsibilities to support an environmental management system.
- b. Those organizations that are identified as not needing to develop environmental management programmes or plans are expected to include a statement within their HSE Management system documentation to the effect that they will make it a responsibility for all their employees to cooperate with others that have developed environmental management programmes where appropriate.
- c. Organizations that have identified a need to develop environmental management programmes are expected to provide documented roles and responsibilities for identified critical personnel.
- d. The roles and responsibilities of the critical personnel are required to be effectively communicated to the identified personnel, and where appropriate, organizations will be asked to demonstrate how this was achieved.

8.6 STOW-TT Minimum HSE Requirement Statement 8.6
EMS documentation e.g. Policy, EMS manual, procedures

8.6.1 Guidance

- a. Organizations that have identified they have little impact on the environment through their normal operations, do not need to provide any documentation other than the general statement on commitment to protecting the environment endorsed by senior management and **a basic impact and aspect assessment covering their activities.**
- b. Organizations that do develop environmental management programmes as a result of their potential impact on the environment are required to demonstrate they maintain detailed documentation.

- c. It is likely that to meet this requirement, the environmental policy, the environmental management system and environmental procedures are documented in such a way that the organization can demonstrate control of the validity and updating of the documents as required.

8.7 STOW-TT Minimum HSE Requirement Statement 8.7
Emergency Response Plans including drill schedule

8.7.1 Guidance

- a. Organizations that have identified they have little impact on the environment through their normal operations, do not need to develop environmental response plans or hold drills.
- b. Those organizations that are identified as not needing to develop environmental response plans or hold drills, are expected to include a statement within their HSE Management system documentation to the effect that they will cooperate with others that have identified the need to develop emergency response plans and run drills where appropriate.
- c. As part of the developed environmental management system, it is expected that organizations will identify the type of environmental emergency they may encounter through normal operations and for a list of these to be maintained.
- d. Having identified the types of emergency the organization may face, they are expected to have suitable and sufficient plans in place, with adequate resources, including training to be able to respond effectively to the identified emergency situations.
- e. In meeting this requirement, organizations with documented emergency response plans will need to show that they hold emergency response drills to address the environmental emergencies they recognize they could face.
- f. The frequency and type of drills that organizations run will be influenced by the extent of the risk their operations pose to the environment, however, all drills should be run according to an approved schedule and some formal reporting on the effectiveness of the drills that are held should be maintained.

8.8 STOW-TT Minimum HSE Requirement Statement 8.8
Annual auditing of the EMS

8.8.1 Guidance

- a. Organizations that have identified they have little or no impact on the environment through their normal operations, do not need to audit environmental plans annually, however they are expected to review their general policy statement at

least once every three years or if their activity type changes to one that may impact the environment.

- b. Those organizations that are identified as not needing to audit environmental management systems on an annual basis, are expected to include a statement within their HSE Management system documentation to the effect that they will cooperate with others that carry out annual auditing of their environmental management system as appropriate.
- c. Organizations that operate an environmental management system are required to audit that system formally at least once every year.
- d. It is acceptable for the audit of the environmental management system to be carried out internally where the organization is able to demonstrate the competence of at least one facilitator to lead the audit team.
- e. Organizations that carry out audits of their environmental system are required to maintain adequate records of the audit, develop action plans as appropriate and be able to demonstrate the process for closing out agreed action items.

9 Guidance - Element 9: Incident Reporting and Investigation

9.1 STOW-TT Minimum HSE Requirement Statement 9.1

Systems for reporting, investigating, managing incidents

9.1.1 Guidance

- a. All organizations are required to have documented systems in place that describe the process for reporting, investigating and managing incidents to the minimum levels required by legislation in Trinidad and Tobago.
- b. Where organizations carry out operations in higher risk areas of the industry, they are expected to have an effective, communicated system for the reporting of all incidents and accidents that occur in the workplace.
- c. All organizations are required to have a documented system that informs individuals, supervisors, managers and others of the process they are to follow in order to ensure incidents are investigated.
- d. The level of detail required to be provided in the documented system for investigating incidents and accidents may to some extent be influenced by the nature of the risk that the organization usually operates under, however this does not reduce the need for effective investigation of incidents at the appropriate levels of management.
- e. Reasonable incident and accident investigations systems will be aimed at identifying root cause/s of the event and supported by an appropriate level of supervision or management.
- f. All organizations are expected to have documented systems in place for managing incidents. These will cover:
 - i. The roles and responsibilities of individuals that have specific duties under the process
 - ii. The level of training that needs to be provided to allow individuals to carry out their duties under the incident management system
 - iii. Any site specific or organization specific requirements for communication or other aspect of incident management

9.2 STOW-TT Minimum HSE Requirement Statement 9.2

Incident investigation processes for incidents

9.2.1 Guidance

- a. All organizations are required to have a process to be used to determine the level of investigation that is needed for each type of incident. For incidents identified as

critical, organizations are required to have a documented process to be used to investigate these incidents.

- b. The first step in meeting this requirement will be for organizations to clearly define, document and communicate to all employees what is considered to be a critical incident. Some examples of this are:
 - i. Incidents involving multiple injuries of multiple persons.
 - ii. Incidents causing significant injury such as those requiring hospitalization, surgery or time away from work.
 - iii. Incidents with the potential to fall into the critical incident category.
- c. Having identified what a critical incident is, organizations will need to demonstrate the documented process to be followed. As a minimum this will include:
 - i. A Senior manager setting up an investigation team that is empowered through the issue of a documented Terms of Reference
 - ii. A method for identifying the critical plant, equipment and personnel involved in the incident
 - iii. The process to be followed to investigate the incident, including access to specialist advice, interview of personnel and a structured method of identifying causation
 - iv. The reporting format to be used
 - v. The acceptance and rejection process for management to follow in reviewing the recommendations
 - vi. The method of communicating lessons learnt to appropriate groups
 - vii. The method for following up and closing out action items that arise for the accepted findings of the investigation
- d. Linked specifically to critical incident investigation processes, it is expected that organizations will have a clearly defined training programme for personnel that is likely to be appointed to this level of incident investigation.

9.3 STOW-TT Minimum HSE Requirement Statement 9.3 ***Stop Work Order following a critical incident***

9.3.1 Guidance

- a. This minimum requirement addresses the need for organizations to have a documented, defined and communicated method to stop or close down operations in a timely but safe manner following notification of a critical incident.
- b. When a critical incident occurs, it is likely that there are a number of operations being carried out that may or may not be affected by the critical incident.

- c. This requirement makes it incumbent on organizations to plan for stopping that work, and to perhaps consider stopping work of a similar nature at other work sites until they are assured that the critical incident cannot be repeated.
- d. The process for stopping work following a critical incident is expected to be understood by all levels of supervision.

10 Guidance - Element 10: Crisis and Emergency Management

10.1 STOW-TT Minimum HSE Requirement Statement 10.1 ***Systems for identification of emergency situations & consequences***

10.1.1 Guidance

- a. Organizations are expected to have a systematic and documented approach to identifying reasonably foreseeable emergency situations that could arise out of their normal operations.
- b. Where organizations are involved in low level risk activity, it is likely that this process will not develop many emergency scenarios.
- c. Some scenarios that most organizations are likely to consider are:
 - i. Fire – Buildings or process
 - ii. Medical – Heart Attack, stroke, epileptic fit
 - iii. Security – Violent attack, internal or external
 - iv. Natural – Earthquake, flooding, lightning
- d. In addition to those mentioned above, organizations that are involved in higher risk activity may need to consider other scenarios such as:
 - i. Pressure release incidents – well blow out, separator failure
 - ii. Falls from height incidents – suspended and freefall
 - iii. Chemical Release – Gas clouds, liquid spills
 - iv. Aircraft Incidents – crash on landing, fire on board
 - v. Electrical incidents – Power failure, isolation failure
 - vi. Nuclear incidents – Radiation exposure, loss of radiation sources
 - vii. Lifting incidents – Dropped loads, failed booms, struck by injuries
- e. In identifying the emergency scenarios that could occur during their operations, the system used by an organization is required to identify the reasonably probable consequences that could occur from the emergency situation being realized. For example:
 - i. Where a person falls from height but is prevented from hitting the ground because of a fall arrest device, it is reasonable the person may suffer some bruising, perhaps even some broken bones, but it is unlikely that they will be killed, although that is remotely possible.

10.2 STOW-TT Minimum HSE Requirement Statement 10.2
Response Plans are documented, accessible and communicated.

10.2.1 Guidance

- a. Having identified the reasonably expected emergency scenarios that could develop from an organization's activity, this requirement expects organizations to document the approach they will take to deal with the emergency scenario should it be realized.
- b. The emergency response plans are expected to be available to all that need to use or be familiar with them.
- c. It is also expected that the emergency response plans are effectively communicated to all that could be involved in an emergency situation while at work.
- d. In order to meet this requirement, organizations will need to show evidence of the method in which they communicate the content of the emergency response plans to the workforce.

10.3 STOW-TT Minimum HSE Requirement Statement 10.3
Resources required are identified, available and tested

10.3.1 Guidance

- a. The resources that are required to deal with identified emergency scenarios may be varied depending upon the number and types of incidents the organizations envisage they could encounter. Some examples are:
 - i. Fire-fighting equipment – extinguishers, hoses, fire suits, breathing apparatus, etc.
 - ii. Medical equipment – Resuscitators, stretchers, clinical equipment etc.
 - ii. Communications equipment – telephones, radios, computers, etc.
- b. Organizations are expected to document the resources that are required and to be able to demonstrate that they are available at the location identified in the emergency response plan/s
- c. The resources identified should be tested periodically to ensure they are functioning as intended. This may mean running fire hoses and fire pumps, it may mean testing radios to ensure they work in the environment they are in etc.
- d. It is expected that organizations that meet this requirement will maintain a register that identifies:
 - i. The resources that are in place
 - ii. The frequency at which they should be tested

- iii. The method of testing the resource
- iv. A record of the testing that is carried out
- v. The name of the individual/s that tested the resource
- vi. Any deficiency found during the test
- vii. Any corrective action required following the test and a record of the status of that corrective action

10.4 STOW-TT Minimum HSE Requirement Statement 10.4
Staff is trained in and understand the emergency response plans

10.4.1 Guidance

- a. Having developed emergency response plans, it is expected that organizations will have identified the training needs of personnel that have duties to perform in making the emergency response plan effective.
- b. It is also required that employees without specific roles in the emergency response plans are given training or awareness to ensure they understand the actions they are required to take in the event of an emergency response plan being activated.
- c. In meeting this minimum requirement, organizations will have a documented process for identifying those personnel that are required to be trained for their role in the emergency response plan and the frequency for refresher training.

10.5 STOW-TT Minimum HSE Requirement Statement 10.5
Emergency response drills and exercises are conducted regularly

10.5.1 Guidance

- a. It is expected that organizations will assess the effectiveness of their emergency response plans by running drills, that walk and talk the personnel through the process and exercises that test the effectiveness of the emergency response plan.
- b. The frequency at which drills are held should be influenced by the potential for the emergency to occur. It is usual for drills to be held more frequently than exercises.
- c. In order to meet this minimum requirement, it is expected that organizations will have a documented matrix of emergency response drills planned that cover the full range of emergency response scenarios that have been identified.
- d. In order to meet this minimum requirement, it is expected that organizations will have a documented matrix of emergency response exercises planned that cover the full range of emergency response scenarios that have been identified.

- e. It is acceptable for the emergency response drill and exercise matrix to be combined.
- f. All emergency response drills and exercises should be recorded with details of any problems with the plan and any corrective actions identified and followed through to completion with records kept.

11 Guidance - Element 11: Monitoring, Audit and Review

11.1 STOW-TT Minimum HSE Requirement Statement 11.1 ***HSE performance is measured, monitored, recorded and analyzed***

11.1.1 Guidance

- a. Organizations are expected to have clearly defined measurement criteria described in their HSE Management system or HSE performance planning documentation.
- b. Examples of the types of performance measuring that organizations use are:
 - i. Incident frequency rates, usually expressed as a rate per 100,000 man-hours worked
 - ii. Internal audits – these may be of the entire system, part of the system or single aspects of the system and is usually set as a pre-defined frequency, such as once per week, per month or quarter
 - iii. External audits – these are usually wider based and less frequent than internal audits
- c. In order to show that the HSE performance is monitored and recorded, organizations will have a system in place for documenting the up to date performance of the organization and a record of the performance will be available for review.
- d. In order to show that HSE performance is analyzed, there should be some record of the analysis that has been carried out, perhaps resulting in an improvement plan or corrective action that are also monitored through to closure.
- e. The level and detail that organizations are required to monitor, measure, record and analyze HSE performance is accepted as being influenced by the level of activity and the nature of activity that the organization is involved in.

11.2 STOW-TT Minimum HSE Requirement Statement 11.2 ***Work Sites conduct HSE inspections and audits***

11.2.1 Guidance

- a. Organizations that meet this minimum requirement will be able to demonstrate records of the HSE inspections and internal audits that have been carried out.
- b. Where organizations are involved in higher risk levels of activity, it may be required that they demonstrate a pre-planned schedule of inspections and audits to be carried out by the work site based employees, supervisors or managers.

- c. Work site inspections and audits are expected to identify opportunities for improvement and this will lead to corrective actions that the organization should be able to demonstrate as being reviewed for acceptance or rejection, and where accepted, the organizations should be able to show follow through to closure.

11.3 STOW-TT Minimum HSE Requirement Statement 11.3
Annual management reviews are conducted

11.3.1 Guidance

- a. Management is expected to be actively involved in reviewing the HSE performance of the work sites they control.
- b. This will be evidenced by documentation that identifies the management review that took place, describing the methodology and findings of the review, along with identified corrective actions that the organization can demonstrate as being monitored through to closure.
- c. Management is also expected to be involved in the review of work that is carried out by their organization on work sites they do not control. This type of review may be more in line with review of work or job reports, but will be evidenced through minutes or report on the review that took place.

11.4 STOW-TT Minimum HSE Requirement Statement 11.4
The HSE Policy and Standards are reviewed once every three years

11.4.1 Guidance

- a. The general policy statement made by the organization will be reviewed and re-issued with a current date at least once every three years.
- b. The review of the entire safety management system is often achieved as a continuous process with different parts being reviewed each month, quarter or year.
- c. It is expected that organizations with documented HSE management systems will have a document control system that indicate the last time the document was reviewed and the name of the appropriate level of approving manager in the organization.
- d. Organizations will meet this minimum requirement where they are able to demonstrate that no document within their HSE Management system is more than three years old without having been reviewed and approved by an appropriate level of management.
- e. Where organizations are involved in the higher risk activity in the industry, there may be a requirement for managers in organizations to demonstrate their

understanding of the process used to review HSE management system documentation.

Glossary

ASA	Advanced Safety Auditing
AUOTT	Association of Upstream Operators of Trinidad & Tobago
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
OPITO	Offshore Petroleum Industry Training Organization
PLEA	Point Lisas Energy Association
PPE	Personal Protective Equipment
STOP	Safety Training Observation Program
T-BOSIET	Tropical Basic Offshore Safety Induction & Emergency Training
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

Trinidad and Tobago Environmental Management Act, 2000

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>