



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



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

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Definitions

Accountability:	Acknowledgment and assumption of responsibility for actions and decisions.
Assessable:	Quantifiable, measurable; to officially say what the amount, value or rate of (something) is.
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 with agreed-to performance standards and also understanding their limitations.
Complex Work:	Work which has several simultaneous, potential and different sources of risk. Complexity is to be determined based on multiple variables affecting the risk potential associated with the job task(s).
Critical Activity:	A process which if conducted outside expected parameters has the potential to result in a major accident event.
Critical Incident:	An event or situation that creates a major risk of substantial or serious harm to persons, property, the environment and business continuity.
Critical Positions:	Those positions that are instrumental to delivering an organization's HSE priorities or exert a substantial influence on achieving HSE operational and strategic goals.
Effectiveness:	The degree to which a planned effect is achieved. Planned activities are effective if these activities are realized. Similarly, planned results are effective if these results are actually achieved.
Environmental aspect:	An element of a facility's activities, products or services that can or does interact with the environment. These interactions and their effects may be continuous in nature, periodic or associated only

with events such as emergencies.

Expert/ Specialist: Person with extensive knowledge or ability in a particular area of study.

Fit to work: Fit to work is a medical assessment done when an employer wishes to be sure an employee can safely do a specific job or task. The purpose is to determine if medically, the employee can perform the job or task under the working conditions. The fit to work assessment is usually done pre-employment, after a work related accident which resulted in injury, after a serious non-work related illness and when transferring to a job assignment where the risk exposure is different.

Health, Safety & Environmental Policy: A fundamental component of an organization's HSE Management System it is the overall control document and vehicle for communication comprising: - of a statement of intent, organizational means for implementation, the arrangements made for HSE in the workplace; and arrangements for assessing and recording significant risks.

Incident: Incident – an event or chain of events which has caused or could have caused injury, illness and / or damage (loss) to assets, the environment or third parties. (Glossary of HSE terms, International Association of Oil and Gas Producers; September 1999).

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

Method Statement: A method statement describes in a **logical sequence exactly how a job is to be carried out** in a safe manner and without risks to health, safety & the environment. It includes all the risks identified in the risk assessment and the measures needed to control those risks. **This allows the job to be properly planned and resourced.**

Multi-occupancy site: Multi-occupancy site / project - a site / project where there may be one or more service providers operating and where there can be the potential to have Simultaneous Operations (SIMOPS). This site / project is normally, though not always, controlled by the Operating Company (the site controller)

Multi-organization:	This is where several organisations form an entity for the execution of a project or task, e.g. a Joint Venture.
Procedure:	A document that describes how an activity is to be performed by outlining a series of steps to be followed in a regular, definite order. The document also indicates who is responsible for executing these steps.
Process:	A series of actions that produce something or that lead to a particular result.
Remote Locations:	These are all sites other than the company's main office location. They can include satellite offices as well as all clients' sites where the contractor has work in progress or a site office.
Shall:	“Shall” denotes the minimum requirement in order to conform to the STOW-TT HSE Minimum Requirements
Significant environmental aspect:	An environmental aspect that has or can have a notable environmental impact. Significance can be tied to environmental concerns and / or natural resource concerns and is usually determined based on the organization's impact / aspect assessment.
Standard:	A standard is a document, established by consensus and approved by a recognised body (local or international) or by the management of an organisation, that provides, for common and repeated use, rules, guidelines or characteristics for activities or their results.

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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 providers 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:

- ~~Arcelor Mittal Point Lisas Limited~~
- Atlantic
- ~~BG Trinidad & Tobago~~
- BHP Billiton Trinidad & Tobago
- bpTT
- ~~Centrica Energy~~
- Chevron Trinidad and Tobago Resources SRL
- DeNovo Energy
- EOG Resources Trinidad Limited
- Heritage Petroleum Company Limited
- Industrial Plant Services Limited
- Methanex Trinidad Limited
- Methanol Holdings (Trinidad) Limited
- National Energy Corporation of Trinidad & Tobago
- National Gas Company of Trinidad & Tobago Limited
- Nu-Iron Unlimited Trinidad & Tobago
- PCS Nitrogen Trinidad Limited
- ~~Petrotrin~~
- Phoenix Park Gas Processors Limited
- Point Lisas Industrial Port Development Company Limited (PLIPDECO)
- Pt. Lisas Nitrogen Limited
- Power Generation Company of Trinidad & Tobago Limited
- ~~Repsol E&P Trinidad & Tobago Limited~~
- Shell Trinidad Limited

- Trinidad Cement Limited
- ~~Trinity Exploration and Production Limited~~
- Trinidad Generation Unlimited
- 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 mention 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's 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 manage 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 referring 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 is 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 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. However, once a contract is awarded, if additional requirements are stipulated outside of the STOW-TT Minimum HSE Requirements, the operating companies reserve the right to request additional information from service providers.
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. However, the Energy Chamber of Trinidad & Tobago reserves the right to reject an application from a service provider if the Chamber receives credible evidence that the applicant is contravening the laws of Trinidad & Tobago. Note that it is now mandatory for sub-contractors to be STOW certified once this is a requirement of the client / operating company.
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 online at <http://stowtt.energy.tt> to the STOW-TT Project Office. The STOW Project Office will send a contract outlining the terms and conditions of the STOW certification audit, as well as the expected number of days and cost for the audit. The contractor has to sign the contract to proceed with the audit.
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 signed the contract 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, who, 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 lower level of certification, while the Senior Independent Assessor is permitted to audit applicants at both levels of certification.

7. **The Energy Chamber will contract the Assessor** to carry out the certification process. 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. **The number of days for a full audit (including writing the report and pre-audit activities) is derived as follows:**

Table 1: NUMBER OF DAYS FOR AUDIT

No. Employees	Total No. Days		Total No. Days
	High Risk Audits		Low Risk Audits
	High Complexity	Low Complexity	
1-5	4.5 days (min. 8 hours on site)	4 (min. 8 hours on site)	4 (min. 8 hours on site)
6-25	5 days (min. 16 hours on site)	4.5 (min. 12 hours on site)	4 (min. 8 hours on site)
26-50	6 days (min. 24 hours on site)	5 (min. 16 hours on site)	5 (min. 16 hours on site)
51-150	7 days (min. 32 hours on site)	5.5 (min 24 hours on site)	5 (min. 16 hours on site)
> 150	8 days (min. 40 hours on site)	6.5 (min 32 hours on site)	5 (min. 16 hours on site)
N.B. 1. The number of days quoted may be adjusted upwards depending on the number and geographic locations of the sites that the contractor wishes to be certified. 2. If the actual audit is completed in less time, the number of days will be adjusted downwards.			

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 determine if the applicant meets the required documentary standard.
10. The initial documentary review as well as the opening & closing meeting will take place remotely from the applicant's place of business or work sites. If the applicant does not wish to give / send their documentation to the Assessor, they can request that the documentary review takes place at their place of business.

Procedure involved where HSE documentation does not meet requirements

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 Energy Chamber has contracted the Independent Assessor to process, they are required to inform the applicant immediately, advise them that the audit would be stopped and get a response in writing. If after discussion with the applicant, the latter requests that the audit be completed, the Assessor can continue the audit. However, in both instances, a documented report must be submitted 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. The Assessor must also communicate this to the STOW Project Office.
13. Provided the Independent Assessor considers that 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 being 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. Provided 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. 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.
18. 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.
19. 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.
20. 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 **two months** from the **date of initial application**.
- 21.1 Where a **two-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 conditions tour AND
 - (ii) attain the following level of conformance to the STOW minimum 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

N.B. In addition to the above requirements, companies must obtain a minimum of 80% in the physical conditions tour to be granted certification for a period of 2 years. Companies must also be able to demonstrate that they would have completed a full cycle of internal audits of their HSE MS to be considered for two years' certification.

23. As soon as the applicant is in receipt of their valid certification, they may submit 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 For Independent Assessors that fail to report such occurrences, where 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. The policy statement must be communicated with employees and made visible at strategic points within the Organization.

1.2 Managers / Line Managers are accountable for HSE performance.

To meet this minimum requirement, there shall be a documented statement, which indicates Managers / Line Managers are accountable for HSE performance. This documented statement shall be endorsed formally by the organization and a record held of the Managers' / Line 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) *Championing and compliance with organizational rules*
- 2) *Intervening whenever deviations from Organisational rules are observed*
- 3) *Demonstrating an understanding of the work being carried out in their areas of responsibility and being able to discuss the risk and control measures associated with that work.*
- 4) *Conducting inspections of their own sites*
- 5) *Visiting remote sites (These are all sites other than the company's main office location. They can include satellite offices as well as all clients' sites where the contractor has work in progress or a site office) including those not under their control*
- 6) *Engaging employees on HSE issues*
- 7) *Leading and participating in leadership forums or other meetings where they communicate with employees on HSE issues*
- 8) *Complying with all legal requirements of Trinidad and Tobago.*
- 9) *Demonstrating leadership on and off the job*
- 10) *Always wearing appropriate PPE where required*

- 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 which are approved by an appropriate level of management.

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

To meet this minimum requirement, Organizations shall define, document and communicate HSE responsibilities 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 throughout the organization 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 procedure in place informing employees of their rights and responsibility to stop work or refuse work in unsafe conditions based on the requirements of the TT OSH Act.

- 1.10 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 policy / procedure 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. Sub-contractors will also be required to have a valid STOW Certificate.

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 procedure in place for the identification of legal requirements. This process shall include current and pending legislation. The Organisation shall also have an assessable process to ensure compliance. Where a notice of violation was issued to the organization by a legislative body, they must declare this. Failure to declare can affect the decision on certification and if certified, certification can be rescinded.

- 2.2 Systems are in place to ensure that HSE documents and records 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.

Systems must also be 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 all tasks including those associated with critical activity.

To meet this minimum requirement, organizations shall demonstrate that they have a documented process in place for the identification of hazards associated with job tasks, including those associated with 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, interpreting and*

following the risk assessment process to be used.

- ii. Individual knowledge within the group that carries 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 carries 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 and if conditions on site change. This of course should be relative to the hazard(s). If significant, then the risk assessments should be updated.

- 3.4 **Safe Systems of Work**

To meet this requirement, organizations that conduct any special work activities that require the development of specific barriers and controls, must have a written Safe Systems of Work policy. They must also develop written procedures / method statements to ensure that these activities are conducted safely. Critical roles and responsibilities must be identified and persons assigned roles must be aware of and understand these roles. Additionally, all controls identified in the Safe Systems of Work procedures must be communicated to all employees. The Organization must also conduct audits of the Safe Systems of Work system and provide evidence that the Safe Systems of Work process is effective.

- 3.5 There shall be an appropriate Change Management Procedure 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 procedure using a controlled document system, identifying changes to critical roles within the organization, 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. Goals and targets must also be communicated to employees.
- 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 which 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's 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 to 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, organizations 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, organizations shall ensure that workers who are required to work at height on both temporary and permanent platforms are at a minimum, trained in the 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, organizations 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, organizations 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 etc. shall provide suitable and thorough training for this area of work.

6 Element 6 – Security

- 6.1 Organizational Database – 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: Oil and Gas UK (OGUK) Medical or equivalent.**

*To meet this minimum requirement, organizations shall ensure that employees who are required, undergo a 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 **OGUK** 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 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 consider potential adverse environmental impacts and document their willingness to cooperate with other organizations having Environmental Management Programmes and Plans.

8.4 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 relevant personnel who support the EMS. Organizations shall communicate the roles and responsibilities to the persons identified.

8.5 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.

8.6 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 probable 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.

8.7 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 understands 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 **e.g. OHSAS 18001 and ISO 14001 standards.**
- d. The general statement is acceptable when it seeks to:
 - i. Identify hazards and control risk.
 - ii. Provide safe systems of work
 - iii. Provide safe work conditions and equipment.
 - iv. Prevent accidents & incidents.
 - iv. Establish arrangements for reporting incidents & accidents
 - v. Properly address emergency situations
 - vi. Assure competence and provide training.
 - vii. Provide safe handling and transportation of harmful substances.
 - viii. Consult with employees on HSE management and performance.

- ix. Review the policy at regular intervals or when necessary – Regular is generally accepted as meaning at least once every three years.
 - x. Commit the organization to comply with all relevant legislation at all times.
 - xi. Commit the organization to prevent harm to the environment. If the organization has a separate environmental management policy statement, they are not required to define this commitment there.
- 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 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 **Line 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 **Management / Line Managers e.g. Team Leaders, Supervisors etc.** are accountable for HSE performance. This is commonly incorporated into the documented roles and responsibilities of the **Line managers** within an organization.
- b. The documented statement that indicates **managers / line managers** are accountable for HSE performance should be endorsed formally by the organization and a record held of the **Managers'/ Line Managers'** acknowledgement that this accountability has been communicated to them.
- c. All of **the Line Managers**, within an organization 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 **Line Managers** 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 (leading & lagging indicators) 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 their Line Managers. 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 Line Management.
 - iii. Organizations may choose to offer evidence of Line Management that has 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 Line Management 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 e.g. requirement of relevant technical / HSE standards.
 - 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.
 - v. Mitigation / measures that are the output of risk assessments.
- 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 **line** management who are formally trained or can be demonstrated to **have the required** experience to enable them to operate and maintain the established HSE management policies, systems and standards.
 - ii. As the risk levels that organizations operate in increase, or the number of personnel at risk increases, it is expected that there will be increasing availability of access to specialist(s) 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 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 and 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 **line management** 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. **Champion and comply with organizational rules.**
 - ii Intervene whenever they observe deviations from the organizational rules for HSE performance.
 - iii. Demonstrate understanding of the work that is being carried out in their areas of responsibility and be able to talk about the risks and control measures associated with that work.
 - iv. Comply with all the legal requirements of Trinidad and Tobago
 - v. **Engage employees on HSE issues via one on one HSE conversations or via group conversations**
 - vi. **Demonstrate leadership on and off the job**
 - vii. **Lead and participate in leadership forums or other meetings where they communicate with employees on HSE issues**
 - viii Always wear the appropriate personal protective equipment for the work area they are in
- c. It is sometimes difficult for managers to make frequent site visits to remote locations especially if the site belongs to or is under the control of another organization.
- d. To meet this minimum requirement, organizations will have **line management** 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. **Line Management is** expected to be involved in the inspection of their own sites, their own equipment and review 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. Demonstrating an understanding of the status of corrective actions that result from any appropriate inspection or site visit.
 - iv. Ability to show that they are 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 (Lagging) activities**, such as investigation of incidents are also 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 (Leading)** HSE activity.
- d. The types of HSE activity that are expected to be undertaken 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 take specified proactive measures e.g. 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 / Task (or Task Based) Risk Assessment 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 / Task (or Task Based) Risk Assessments 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 completed 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 are 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. For small organisations, this can be done based on the number of employees.
- 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 responsibilities of employees are identified and understood.

1.6.1 Guidance

- a. To meet this minimum requirement, there needs to be documented HSE responsibilities applied either specifically or generically to all employees. This may be achieved by:

- i. Placing specific responsibilities on the employee that are documented in the job description and/or the roles and responsibilities section of the employee's contract of employment.
 - ii. Placing generic responsibilities that are documented in all employees' contracts of employment where additional responsibilities are documented in the positions for which they apply.
- b. Examples of generic responsibilities are:
 - i. Employees are responsible for following all HSE rules at all times.
 - ii. Employees are responsible 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 responsible for using all equipment in the work place as designed and with design safety features operating.
 - iv. Employees are responsible 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 responsibilities have been communicated and understood they should maintain a record of the communication method and proof of employee acceptance of understanding the responsibilities they are required to meet.
- 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 responsibilities I am required to fulfill. All questions I have regarding these responsibilities were answered and I understand that meeting these responsibilities 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 responsibilities to employees, the register should record who was in attendance, the name of the person that communicated the HSE responsibilities, the fact that all questions were answered satisfactorily and that all in attendance agreed that they understood the responsibilities that were explained to them.
- e. Where organizations are involved in higher risk activity, there is some requirement to show that employee HSE responsibilities are reviewed and revised as appropriate. This should be commensurate with the nature and level of risk that employees are or may be exposed to.

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 recognize or reward improved or exceptional HSE performance. In order to meet this minimum requirement, organizations will need to demonstrate that 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 / reward system is operated.
- c. Some HSE recognition / reward systems operate on an individual based approach where the individual is identified as having done something to attract recognition.
- d. Some HSE recognition / reward systems operate where teams or organizational groups are recognized / rewarded for team or organization performance that meets or exceeds pre-defined performance indicators.
- e. Some HSE recognition / reward systems operate with pre-determined frequencies, such as monthly, quarterly or annual recognition / rewards being made, others operate on an “as identified” basis.
- f. Many organizations operate recognition / rewards systems that combine some or all of the approaches mentioned above.
- g. It is not required that HSE recognition / reward systems involve direct financial reward. While this is a common method, other types of recognition / 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.
- i. **The organization must show what systems it has in place to influence a positive safety culture.**

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 **as soon as reasonably practicable or within a specified period as determined by the organization.**
 - 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.
- h. Where disciplinary action is warranted, the organization must provide evidence that the system is applied. Evidence may include the issuance of warning/ dismissal letters or documented management reviews.

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 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 formal documentation 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 suitable formal documentation 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
Management principals and other key management participate in HSE Leadership forum with customers to agree on expectations

1.10.1 Guidance

- a. In order for an organization to meet this minimum requirement, they need to have a **documented policy / procedure** that require senior management to meet with the appropriate leadership teams in their customer organizations to discuss HSE performance and expectations. **This applies to all of the organization's customers.**
- 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, SIMOPS Documents and risk assessments will also demonstrate some level of compliance with this minimum expectation. **The following processes / mechanisms can also be used for communication and agreement on HSE expectations for a job/project:**

Pre-qualification - the contractor describes arrangements for HSE Management. The Energy company pre-qualifying the contractor is an indication of agreement

Tendering / Contract award - the contractor proposes the HSE approach for a specific project. The award of a contract by the Energy company is an indication of acceptance of the approach to meeting the HSE expectations

Meetings as required by specific clients - Project Meetings during tendering or just after award of contract. Some clients communicate specific HSE requirements in writing as they arise.

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 the 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. **Proof of approval can be in the form of a signed document or official email correspondence. Contractors (sub-contractors) will also be required to have a valid STOW Certificate.**

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 **such as the OSH Act, 2004, the Environmental Management Act, 2000 and Regulations associated with the EM Act.**
- b. 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.

- c. 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.
- d. 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.
 - iii. The development of a Corrective Actions Log which would ensure closure of any non-conformances highlighted in the gap analysis.
- e. Organizations must advise if they were issued a Legal Notice of violation. Where a violation has been issued, the Organization must demonstrate that they are working towards addressing the violation(s) and the timeline they have outlined for achieving this, or demonstrate / verify that they have successfully complied with the terms of the Notice.

2.2 STOW-TT Minimum HSE Requirement Statement 2.2

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

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 maintained by the organization.
- c. In order to meet this minimum requirement, organizations will be required to have a **document management system procedure** and show the list of HSE documents and records 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, **physical copies** 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 (legally disclosable e.g. certificates)
- x. Emergency Response Plans
- xi. Permits to work
- xii. Method Statements
- xiii. Any other relevant documentation

2.2.2 Guidance

- a. In order to meet this minimum requirement, organizations will need to show that they have a written procedure 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. Where organizations operate in higher risk areas, they shall be asked to demonstrate that they do hold the documents and they are available.
- c. It is acceptable for these records to be held electronically. However, they need to be readily available to the locations and individuals that are reasonably required to have access to them.
- d. 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 of 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 account for all applicable hazards and risks, with special emphasis on 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 **routine** 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 all applicable hazards and risks and how that identification triggers the use of an appropriate risk assessment process **and the completion of suitable and sufficient risk assessments.**
- e. An example of an organization involved in low level risk routine 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 safely and what to do if they are harmed by them, do they have the right personal protective equipment to use these chemicals? **has a risk assessment been conducted for the use of the chemical(s) and are persons aware of the controls and mitigation measures in place 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 risk 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? **If the vacuum cleaner is in excess of 50 lbs., are there any mechanical aids to move them and minimise manual handling 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 **e.g. by erecting signs to indicate wet floor, etc.?**
- f. In the example above, it is obvious that 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 hazards associated with the work to be carried out, with special emphasis on critical activities.**
 - ii. **Suitably addresses hazards and risks based on the organization's activities.**
 - iii. Identifies all of the reasonable hazards that each critical activity may present.
 - iv. **Clearly outlines all significant consequences resulting from the hazards and risks identified above.**
 - v. Uses an appropriate method for estimating or calculating the probability of the hazard being realised.
 - vi. Uses an appropriately described method to describe the risk presented as a result of the potential for harm and probability of occurrence.
 - vii. Describes clearly what is considered acceptable risk and what is considered unacceptable risk.
 - viii. Identifies practical, effective risk control measures that reduce the risks identified.
 - ix. **Clearly defines risk acceptability based on a defined risk matrix.**

- x. Records the residual risk associated with the critical activity once control measures are put in place.
- xi. **Outlines an appropriate method for monitoring and review of the risk management process.**
- xii. 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.
- xiii. Facilitates an effective method of communicating the contents and control measures required to the personnel that will carry out the critical tasks.
- xiv. 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 ensures the following:
 - i. That appropriate personnel are competent in understanding, interpreting and following the risk assessment process to be used.
 - ii. That individual knowledge within the group that carries 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. That individual experience within the group that carries 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 **subject matter experts facilitated by a risk assessment process expert. This does not apply for low risk activities. These experts may be from an operating company where the organization is not the site controller.**
- d. Where organizations are likely to work as part of a multiple organization group **i.e. where several organizations form an entity for the execution of a project or**

task e.g. a Joint Venture, it is expected they will have a process for agreeing upon the risk assessment process to be used on the project and to assist the risk assessment process by providing t skilled and knowledgeable personnel who are most likely to provide integrity of the process. **The following processes / mechanisms can also be used for communication and agreement on the risk assessment process (as well as HSE expectations) for a job/project:**

Pre-qualification - the contractor describes arrangements for risk assessment. The Energy company pre-qualifying the contractor is an indication of agreement.

Tendering / Contract award - the contractor proposes the risk assessment approach for a specific project. The award of a contract by the Energy company is an indication of acceptance of the approach to meeting this HSE expectation.

Meetings as required by specific clients - Project Meetings during tendering or just after award of contract.

Some clients communicate specific HSE requirements in writing as they arise.

- e. Where organizations are likely to be the site control **i.e. having overall accountability for a site** for a multiple organization/ multi - occupancy 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 /participated in the risk assessment
 - iii. The date the risk assessment was carried out
 - iv. The 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 the scope of work changes or the conditions on site, or the circumstances under which the risk assessment was carried out change significantly or if established control measures fail due to unforeseen circumstances e.g. unsecured dropped object which comes into contact with personnel; unauthorized personnel entering established barriers during critical work; extreme weather conditions etc.

3.4 STOW-TT Minimum HSE Requirement Statement 3.4

Safe Systems of Work

3.4.1. Guidance

a. All Organizations must have a written safe systems of work policy to address special work activities such as the following:

- Hot Work Activities
- Lock Out Tag Out / Energy Isolation
- Confined Space Entry
- Excavation Work
- Radiation Activities
- Work at Heights
- Lifting and rigging especially where any complicated lifts are involved
- Cryogenic Work
- Hydro blasting
- Sandblasting
- Work involving the use of portable electrical equipment
- Asbestos removal
- Hazardous Chemicals & Substances
- Any other identified activity with such levels of risks which may warrant the need to be adequately controlled by the use of comprehensive policies and procedures.

b. Written procedures / method statements must be developed for carrying out all work activities defined above. All procedures must be developed in accordance with the Organization's Document Control and Management of Change systems as well as the guidance outlined in Section 6: 4.6.1.d for developing Method Statements.

c. All procedures must clearly identify critical roles and responsibilities necessary for the effective implementation of the procedure. There must be evidence e.g. signed job descriptions, signed training registers, signed personal acceptance forms etc. to demonstrate that these roles

and responsibilities have been communicated to employees and that employees understand their responsibilities.

d. All controls identified in Safe Systems of Work procedures must be effectively communicated to employees via awareness trainings or as part of the induction process. Evidence of communication must be provided in the form of signed participation forms / acceptance of training forms. Procedures and their controls must be made readily available and can be posted on notice boards at strategic locations within the Organization. They can also be made available electronically via the Organization's intranet or other established public network location.

e. To ensure the safety of tools and equipment used within the Organisation, there should be a preventative maintenance program to test, inspect and certify tools and equipment where applicable.

f. The Organization must conduct audits of the Safe Systems of Work system and develop a pre-determined schedule for conducting audits. Audit reports should be developed for completed audits with corrective actions identified & managed to improve the system. Where applicable, there should be a system in place to track the actions to closure. Management of corrective actions includes documentation of corrective actions, review of corrective actions by senior personnel for approval, assignment of resources, deadlines and responsibilities for closure, regular follow up and tracking to completion. Useful tools in this process include but are not limited to corrective action logs, regular meetings to review corrective action status and regular reports on corrective action closure rates.

3.5 STOW-TT Minimum HSE Requirement Statement 3.5

There shall be an appropriate Change Management Procedure 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.
- d. Changes are adequately approved.

3.5.1 Guidance

- a. Any appropriate change management procedure 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 effective, relevant organizational communication methods. Replacement in kind (i.e. meeting the design specification of the original / provision that maintains the original intent

and functioning of the original process etc.) does not require activation of the MOC process. However, this is up to the Organisation.

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. For high risk organizations, there should be evidence that senior HSE professionals are involved in the business planning processes, to 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. The organization must ensure that any set goals and targets are effectively and formally communicated to all employees.
- d. 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
- e. 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
- f. The senior management of a company should set **measurable goals** and HSE targets based on review of historical performance data and **industry best practice** that sets a reasonable expectation of being scored while demonstrating a need for continuous improvement.
- g. In setting the targets, they should be defined in such a way that unambiguous measurement can be demonstrated. **For high risk organizations, they will be required to document these targets and demonstrate that where targets are not met, that there is a marked attempt towards achieving said targets.**
- h. 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.
- i. HSE goals may be longer term aims, but the organization should set them, document them and measure the performance against the targets set.
- j. 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 and reporting relationships 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 as well as the reporting relationships involved 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 responsibilities 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.
- k. The organization must keep records to demonstrate that persons actually fulfill their roles and responsibilities with respect to the implementation and execution of the HSE Plan. To meet this requirement, organizations must be able to provide suitable evidence such as minutes of meetings involving required personnel, training records to demonstrate that persons possess the required knowledge and technical skills to ensure that the HSE Plan works, records to show that required personnel conduct training on HSE issues to the wider work force, completed risk assessments to show the involvement of required personnel in the organization.

The organization can also provide other relevant evidence which can show that persons actually fulfill their roles.

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. Procedures should also indicate the person of authority who is responsible for ensuring that the control measures are implemented and that they are working.
- 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 for stopping work that is unsafe during specific work activities should be clearly documented so as to ensure that 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 **process** in place that identifies the critical personnel in their organization **i.e. personnel with roles that are instrumental to delivering an organization's HSE corporate priorities or exert a substantial influence on achieving HSE operational and strategic goals.**
- 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 résumé 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 meet prior to selection and then to be able to match that criteria to the résumés 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. **This minimum requirement is different from requirement 6.3 in this document which** relates to asset specific equipment and the personnel control plan. The intent of **6.3** is to also 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

- vi. Breaking containment – vessel work
- 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
 - xiv. Updated SDS (Safety Data Sheet) (current and approved) for any chemicals involved to be used in the task(s).
- 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 Systems of Work key areas: -

5.0.1 Guidance

- a. Organizations 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

- vi. That they monitor the effectiveness of all training delivered. Examples of how this may be achieved are observing employees at work after training, and conducting refresher assessments to ensure that employees maintain knowledge required to perform their job tasks safely.
- 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.
- h. Organizations should have a process to qualify internal trainers which may or may not be documented. As part of this process, this can include requesting and verifying curriculum vitae and certificates as well as evidence of conducting previous training within the organization or at previous organizations.

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
 - vi. That they monitor the effectiveness of all training delivered. Examples of how this may be achieved are observing employees at work after training, and

conducting refresher assessments to ensure that employees maintain knowledge required to perform their job tasks safely.

- 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
 - vi. That they monitor the effectiveness of all training delivered. Examples of how this may be achieved are observing employees at work after training, and

conducting refresher assessments to ensure that employees maintain knowledge required to perform their job tasks safely.

- 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 ***Incident Reporting & Investigation***

5.5.1 Guidance

- a. All organizations are required to have a documented system to report all accidents & incidents and to provide employees with information on accident & incident 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 & incident 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 & incidents and therefore all employees have a legal duty to report accidents & incidents 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 & incidents 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 & incident prevention and 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
 - vi. That they monitor the effectiveness of all training delivered. Examples of how this may be achieved are observing employees at work after training, and conducting refresher assessments to ensure that employees maintain knowledge required to perform their job tasks safely.
- g. Where organizations use external training providers to train personnel in their accident & incident prevention and 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
 - vi. That they monitor the effectiveness of all training delivered. Examples of how this may be achieved are observing employees at work after training, and conducting refresher assessments to ensure that employees maintain knowledge required to perform their job tasks safely.
- 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
 - vi. That they monitor the effectiveness of all training delivered. Examples of how this may be achieved are observing employees at work after training, and conducting refresher assessments to ensure that employees maintain knowledge required to perform their job tasks safely.
- 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
 - vi. That they monitor the effectiveness of all training delivered. Examples of how this may be achieved are observing employees at work after training, and

conducting refresher assessments to ensure that employees maintain knowledge required to perform their job tasks safely.

- 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
 - vi. That they monitor the effectiveness of all training delivered. Examples of how this may be achieved are observing employees at work after training, and conducting refresher assessments to ensure that employees maintain knowledge required to perform their job tasks safely.
- 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

g. Engulfment 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, organizations 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, organizations shall ensure that workers who are required to work at height **i.e. in excess of six feet** on both temporary and permanent platforms are at minimum trained in:

- a. Fall protection requirements
- b. Personal fall arrest **& restraint** systems (use; fit; limitations)
- c. Rescue for fall from 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, organizations 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 **high** 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
- e. **Proper use of PPE designed for conducting hot work**

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 and maintain 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 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
 - iii. Consultation with persons in the neighborhood of the employee

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. **Apart from equipment such as fire extinguishers, fire and gas detectors and hose reels, safety critical equipment can include pressure release valves and emergency shutdown devices.**
- 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. **For low risk organizations, a register of plant and equipment is sufficient. For high risk**

organizations, 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 **an offsite** 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. Where organizations are involved in higher risk activities, they are required to include a process that allows for both random and with cause substance abuse testing of personnel.
- 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 **what is considered as alcohol and drugs** 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 alcohol or drug abuse
 - v. What process or processes the organization will use to handle violations of the substance abuse policy
- c. Trinidad and Tobago legislation (**OSH Act, 2004: Section 10 (1) (f)**) 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.
- d. Where organizations are likely to work on multi-occupancy work sites **i.e. several service providers on one site and where there is the potential for SIMOPS** 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: (OGUK) Medical or equivalent

7.2.1 Guidance

- a. The **OGUK** 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 a medical exam by a certified physician who endorses the medical fit to work certificate as “Fit to work” as per the Trinidad and Tobago OSH Act, 2004.
- 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 / she is fit to work. Fitness for work medical assessments are also done pre-employment, after a work related accident injury and when transferring to a job assignment where the risk exposure is different.
- g. The minimum requirement for all offshore workers to be given a medical examination that meets the standard of the **OGUK** Medical guidelines will need to be met.
- h. The **OGUK** medical examination guidelines are available from the **OGUK** 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 **OGUK** Web site is: <http://www.oilandgasuk.co.uk>.
- j. A list of qualified doctors registered in Trinidad and Tobago can be found at: <http://www.oilandgasuk.co.uk/knowledgecentre/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 health hazards and risks are identified
 - ii. Suitable steps to identify how to control the health hazards and risks
 - iii. The steps identified are implemented
 - iv. The implemented steps are monitored for effectiveness. This includes dose monitoring & periodic medical assessments.
- g. Organizations must be able to demonstrate that they have implemented the Health Risk Management Plan based on the findings of the Health Risk Assessment. To meet this requirement, organizations will have to show evidence of implementation of the Health Risk Plan. The evidence can include records of the following:
 - i. Training records for persons assigned roles with respect to the implementation of the Health Risk Management Plan.

ii. Stress test records

iii. PPE fit test records

This list is not exhaustive and organizations can provide any other records which can suitably provide evidence of implementation of the Health Risk Management Plan.

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

- iv. Where the organization is carrying out work on the operator's facility, the emergency response plan should include alerting the relevant authority at the operating company.
- e. Organizations that operate at onshore and offshore locations as part of a multi-organization site will need to show their arrangements for transport from the onshore or offshore location to the receiving medical facility.

8 Guidance - Element 8: Environmental Management

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

8.1.1 Guidance

- a. Organizations with a significant environmental impact 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 based on the findings of a suitable and sufficient environmental aspect and impact assessment, are expected to have dedicated environmental policy statements, endorsed by senior management. For organizations that would have integrated the environmental policy statement into the overall health, safety and environmental policy statement, once the statement comprehensively considers the aspects and impacts of the organization's activities, this would also be acceptable.
- 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 must be able to demonstrate the effective methods they use to communicate the environmental policy statement.
- f. Organizations shall ensure that significant environmental aspects as determined by a suitable and sufficient environmental aspect and impact assessment 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 and sufficient environmental aspect / impact assessments have been completed by competent personnel to determine the aspects that can have significant impact on the environment. Significance is to be determined based on risk ranking before control measures are considered to reduce the risk. Once the Organization's significant environmental aspects are determined, they must demonstrate the implementation and maintenance of

suitable control measures to mitigate the environmental impacts identified. **The environmental aspects & impacts assessment should be reviewed annually.**

- 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 **based on the results of the risk assessment** are required to have a documented requirement to cooperate with other organizations that they may work with, as part of multi-occupancy 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 of their operations.
- e. All organizations are expected to have a documented approach to working with multi-occupancy 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 ***Environmental Management Program including ERP***

8.3.1 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 **must still consider any potential adverse environmental impacts** and 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. **The plan should give an overview of the Organization's scope of activities, the scope of the environmental management plan, the overall environmental management objectives and the environmental policy. The plan should give an overview of the environmental management structure and responsibility, identifying clear reporting lines. The plan should also contain the environmental risk assessments and control measures to mitigate against the environmental impacts identified. Finally, the plan should outline the procedures for environmental monitoring and review, auditing and**

addressing corrective actions. Organizations must demonstrate that the controls identified in the Environmental management programme have been implemented and maintained.

- 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.
- e. Organizations must demonstrate that they have actually implemented the Environmental Management Programme and Plan. To meet this requirement, the organization can provide documented goals and targets related to improving environmental performance, environmental monitoring reports for testing of effluent, emissions and the ambient environment, corrective actions log showing actions to be taken to address environmental non-compliance or problems, records of waste manifests, purchase orders for spill kits and any other records which can demonstrate implementation of the Environmental Management Programme.

8.4 STOW-TT Minimum HSE Requirement Statement 8.4 **Clearly defined roles and responsibilities to support EMS**

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 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 relevant personnel.
- d. The roles and responsibilities of the relevant personnel are required to be effectively communicated to the identified personnel, and where appropriate, organizations will be asked to demonstrate how this was achieved.

8.5 STOW-TT Minimum HSE Requirement Statement 8.5 **EMS documentation e.g. Policy, EMS manual, procedures**

8.5.1 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 that 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.

8.6 STOW-TT Minimum HSE Requirement Statement 8.6 ***Emergency Response Plans including drill schedule***

8.6.1 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 probable environmental emergency they may encounter through normal operations and for a list of these to be maintained. They will also identify the likelihood of the emergency occurring, the severity of said emergency and the required controls and mitigation measures to address said emergency.**
- 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. **The emergency response plans should be specific to the organization and its business scope.**
- e. In meeting this requirement, organizations with documented emergency response plans will need to show that they **have a schedule for conducting emergency response drills and that they hold emergency response drills at least once per year**

for each identified scenario 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 held at least annually, should run according to an approved schedule and some formal reporting on the effectiveness of the drills that are held should be maintained. Although this is not a requirement for low risk organisations, where they have conducted drills, there should be a report documenting the execution and analysis of the drill.

8.7 STOW-TT Minimum HSE Requirement Statement 8.7 ***Annual auditing of the EMS***

8.7.1 Guidance

- a. Organizations that have identified that 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 and time line for closing out agreed action items. Action plans should be approved by Management.

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 will be 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 who 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
 - iv. A process to track internal and external incidents which affect the Health and Safety of employees and the organization.

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 who are likely to be appointed to this level of incident investigation.
- e. Organizations will be required to demonstrate evidence of required personnel actually carrying out investigations where required. Evidence may include maintaining meeting records for investigations conducted and records of completed investigation reports.

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. **There must also be set criteria for defining foreseeable emergency situations.**
- 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 or explosion – Buildings or process or other location where a fire can occur, or port if applicable.**
 - ii. Medical – e.g. Heart Attack, stroke.
 - iii. **Security – Violent attack (internal or external to the organization), terrorist attack, assault against person(s) in the organisation, burglary or other security emergency**
 - iv. **Natural – Earthquake, flooding, lightning, hurricane, water spout or other natural disaster as applicable to contractor's business.**
- 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 or other pressure release incident to be determined by the organization's business activities**
 - ii. Falls from height incidents – suspended and freefall
 - iii. **Chemical Release – Gas clouds, liquid spills (including oil spills), spills of solid chemicals**
 - iv. **Aircraft Incidents – crash on landing, fire on board, crash after take-off, collision of aircraft with an object, general disintegration of aircraft or other emergency situation associated with aircrafts**
 - v. **Electrical incidents – Power failure, isolation failure, electric shock or other electrical incident which may result from the organization's activities**
 - vi. **Nuclear incidents – Radiation exposure, loss of radiation sources, nuclear meltdown or other incident which may result from nuclear organizations**
 - vii. **Lifting incidents – Dropped loads, failed booms, struck by injuries or other incidents resulting from lifting and rigging activities**

- 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. **These may be provided hard copy and / or soft copy throughout the organization.**
- 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, automated external defibrillator etc.
 - iii. Communications equipment – telephones, radios, computers, etc.
 - iv. Emergency contact listing
 - v. Spill response equipment – chemical suits and other necessary PPE, disposable coveralls, chemical dispersant, spill response material e.g. spill kits, absorbent pads, spill socks 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 inspected and 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 / inspected
 - iii. The method of testing / inspecting the resource
 - iv. A record of the testing / inspection that is carried out
 - v. The name of the individual/s that tested /inspected the resource
 - vi. Any deficiency found during the test / inspection
 - vii. Any corrective action required following the test / inspection 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. This can be covered in the company's employee orientation presentation.

- c. Where employees have been assigned roles and responsibilities with respect to implementing the emergency response plans, they must be able to properly articulate these roles and responsibilities.
- d. 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. It is acceptable for the emergency response drill and exercise matrix to be combined.
- e. 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. Organisations shall monitor the effectiveness of the controls for occupational health and safety. 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 1 million 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. The organization shall maintain records of equipment used or required to measure performance such as calibration and maintenance of equipment.
- 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 that they have a documented procedure for conducting audits and inspections and that they have 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.

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. **The items to be covered in the Management review should include:**

- Analysis of HSE Performance criteria
- Summary Results of HSE Audits & Inspections
- Compliance to legal and other requirements
- Communication
- Objective requirements
- Incident reports
- Corrective / preventative reports & status
- Follow up actions from previous minutes
- New legal & other developments
- Current or planned external changes which may affect the HSE System
- Recommendations for improvement

- b. 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 indicates 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
OGUK	Oil and Gas UK – the leading representative body for the UK offshore oil and gas industry.

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>

Oil and Gas UK (OGUK)

<http://www.oilandgasuk.co.uk>

Qualified Doctors registered in Trinidad & Tobago

<http://www.oilandgasuk.co.uk/knowledgecentre/doctors-list.cfm>.

The Petroleum (Amendment) Act, 2000

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