

Offshore Workforce Involvement and Consultation

**SI 971: Offshore (Safety Representatives &
Committees) Regulations 1989**

Topic Pack and Inspection Template

April 2010

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INTRODUCTION

Background

1. The HSE Strategy, launched in June 2009, cites workforce involvement as one of its main priorities. The consultation exercise on the new strategy indicated widespread collective agreement that workforce engagement has a positive effect on health and safety. This is reflected in the work plans in all HSE divisions, including Offshore Division.
2. To realise the potential benefits of workforce involvement HSE is looking for commitment from all parts of industry and at all levels.
3. The contribution of elected safety representatives and committees to successful health and safety management is supported by numerous research studies. Safety representatives have an important role in any organisation committed to an effective and evident safety culture. However, safety representatives cannot operate effectively without a clear and acknowledged need for training, support, facilities, resources, communication and recognition.
4. The leadership of an organisation sets the tone in terms of safety culture and the agenda in respect of health and safety. Visible and active commitment from senior managers is necessary to establish a culture of sustained and continuous improvement.
5. Many senior managers in the offshore sector have voiced their commitment to health and safety and demonstrate their personal input by contributing to trade association work groups. However, sometimes there are gaps in some organisational behaviours between the undoubted support of industry senior managers and the practical underpinning of the work of health and safety representatives and committees.
6. This inspection programme will look at how this translates to operational actuality in terms of engagement with the workforce and the resourcing of safety representatives.
7. Offshore, the Offshore Installations (Safety Representatives and Safety Committees) Regulations 1989 (known as SI 971), provides the legal framework for the operation of elected safety representatives, safety committees and statutory consultation.
8. SI 971 was drafted, completed and enacted by the Department of Energy in just 14 months following the Piper Alpha disaster on 6th July 1988, its stated purpose – at its enactment and now – is 'to ensure that the whole workforce is formally involved in promoting health and safety, through freely elected safety representatives and a safety committee'.
9. The main regulatory provisions cover:
 - election of safety representatives by the workforce – how the election process is to be organised and carried out;
 - functions of safety representatives – investigation of incidents and complaints, representation, attendance at the safety committee, and consultation;
 - powers of safety representatives – inspection either regularly or following an incident;
 - entitlement of safety representatives to see documentation relating to health and safety, including safety cases or their revisions;
 - establishment, membership, meetings and functions of a safety committee;
 - duties of installations operators, owners and employers – facilitating safety committees and safety representatives;
 - consultation of safety representatives including safety case consultation, health and safety information and training;
 - paid time off for safety representatives – to perform functions as a safety representative and for training, as well as payment for this time;
 - training of safety representatives and the payment of associated travel and subsistence costs.

10. The 2009 KP3 Review included work by the pan industry Offshore Workforce Involvement Group (a sub-group of OIAC, the Offshore Industry Advisory Committee) which looked at SI 971 provisions. This concluded that an inspection programme would assist in assessing the suitability and adequacy of SI 971 in continuing to address offshore workforce involvement issues.

The purpose of this intervention

11. This programme aims to:

- Assess compliance with the regulations
- Ensure that employers and workers understand the legal requirements to inform and consult workers
- Ensure that employers are providing adequate systems to establish effective worker involvement and worker consultation
- Gather examples of good practice to share across the offshore industry and beyond

Key Messages

12. **Headline Message for all audiences:**

Involving workers improves health and safety performance

- There is a large body of evidence that points to this fact.
- Actively engaging the workforce ensures that all those involved with a work activity are participating in managing the risks to which they are exposed

13. **Key Messages for Business:**

Involving workers is an essential part of sensible health and safety management

- Health and safety management is not something done **to** staff, but **with** them.
- You may be pleasantly surprised how many workers are keen to be more involved in health and safety matters.
- Involving workers in health and safety management improves health and safety performance – which increases productivity and reduces costs.

14. **Key Message for Workers:**

Be Part of the Solution!

- Get involved to help raise health and safety standards for you and your workmates.
- You know the risks in your workplace - help manage them.

BENEFITS OF WORKER CONSULTATION AND INVOLVEMENT

15. By introducing or developing worker consultation and involvement, **the employer** will be making significant improvements to their business outcomes by:

- Developing a positive health and safety culture
- Gaining effective input from people closest to the issues - potentially from design stage onwards;
- Reducing accidents and ill health (and the associated costs) in their business;
- Contributing to overall quality management; and
- Complying with legal requirements.

16. For **OIMs and supervisors**, involving both company workers and contract staff in health and safety management is likely to have a number of advantages, including:

- Increased team commitment to health and safety.
- Proactive risk assessment and development of action plans.
- Improved communication with staff
- Encouraging personal responsibility for safety

17. **Workers** themselves benefit substantially from being involved in health and safety decision-making, gaining the ability to:

- Influence the direction of health and safety management;
- Ensure that issues of concern are discussed and addressed;
- Develop competencies and skills, in health and safety, communication, negotiation

18. **All Inspectors - both regulatory and topic specialists** - should meet with safety representatives during visits to installations. Meeting with safety representatives on their own will enable inspectors to:

- Listen to concerns and issues that may not be raised in front of managers
- Ensure that safety representatives are receiving adequate support, training and resources to carry out their duties and functions
- Gain an insight of the organisational safety culture and discuss any challenges that safety representatives may face

WHAT DOES “WORKER INVOLVEMENT” MEAN?

19. “Worker involvement” is an umbrella term to describe the ways in which workers are encouraged to take part in making decisions about managing health and safety at work. When it is most developed and effective, it goes beyond simply giving information or consulting on management proposals. It can create genuine partnerships between employers, managers and workers (either directly or through their representatives) for managing health and safety risks.

20. Involvement means relationships between workers and employers based on collaboration and trust are nurtured as part of the management of health and safety. Effective worker involvement therefore evolves from – but is more than – effective communication and consultation.

21. Fully effective consultation often leads to joint problem solving, which offers employers and workers an even greater level of involvement, and has the greatest potential for improvements to health and safety.

LEGAL REQUIREMENTS AND APPLICATION OF THE LAW

What are the legal requirements?

22. Health and safety legislation sets a framework of fundamental standards for worker involvement. It requires employers to give information, instruction and training and to engage in consultation with employees. These are the most basic forms of worker involvement but it is essential to get them right.

Election of Safety Representatives

23. SI971 provides the statutory framework for the appointment of safety representatives and safety committees offshore. It includes specific directions for the process by which safety representatives are elected. Offshore safety representatives are not union appointed, although some belong to unions and benefit from the additional support networks and resources available through them.

24. Inspectors should ensure that the election process is robust and being adhered to. The regulatory mechanisms were put in place to avoid people being nominated by managers thus losing any visible degree of independence of the management agenda.

Functions, powers and independence

25. For the same reason SI971 provides for safety representatives to have functions and powers that make them independent of management or other influence, particularly in respect of investigations of potential hazards, dangerous occurrences, complaints and the causes of accidents, their role on the safety committee and inspection of installations.

26. SI971 provides for safety reps to receive time off with pay during working hours to:

- receive training; and
- discharge their functions

Resources

27. It is a fundamental principle that representatives should not suffer detriment for fulfilling their functions. Representatives are thus entitled to be paid for performing their functions and to receive "time off" from their normal working duties to do so. HSE can enforce these rights in principle.

28. In addition, the employer must provide representatives with the *accommodation, facilities for communication and office equipment supplies* necessary to carry out their functions.

Training

29. The training of safety representatives is an important aspect of this inspection programme. Under SI971 duty holders must ensure that safety reps are provided with adequate training to be able to fulfil their functions. The costs associated with such training - travel, accommodation, food etc - should not be borne by the representative. All representatives are legally entitled to paid "time off" from their normal working duties to attend training.

30. The appropriateness, frequency and quality of training for safety representatives will affect their ability to carry out their role effectively. Time allocated for training may conflict with operational priorities. The issue of conflicting priorities should be explored by Inspectors to ascertain whether or not safety representatives actually have sufficient time to fulfil their functions and whether this is a resource issue that should be addressed by the duty holder and/or their employer. Contractual arrangements may introduce further complications.

31. Inspectors will explore the way in which the appropriateness of training is assessed - both quantity and quality - on the basis that asking delegates whether or not they enjoyed a course may not be enough to measure effectiveness.

Protection against detrimental treatment

32. The Employment Rights Act 1996 entitles all employees - not just safety representatives - irrespective of length of service or hours of work, to complain to an industrial tribunal if they are dismissed, selected for redundancy or suffer any other sort of detrimental treatment because of their role in any health and safety issues, i.e. performing safety representative functions, bringing a health and safety concern to their employer's notice, taking steps to protect themselves or others in the case of serious or imminent danger.

33. Employment tribunals hear claims about employment matters including unfair dismissal, redundancy payments and discrimination. They also deal with a range of claims relating to wages and other payments such as those for carrying out safety representative duties. A full jurisdiction list is available from any local tribunal office or the Employment Tribunals public enquiry line on 0845 795 9775. Further information about the employment tribunal system can be found at the [Employment Tribunals](#) website.

34. NRB - not required back - is the term used in the offshore industry when an offshore company instructs a contracting company that individuals employed by the contractor will no longer be required to work on the company's installation. This avoids the rights of workers under the Employment Rights Act because it is the offshore company rather than the employer that makes the decision to terminate the work of an individual on an installation. In March 2009 Oil & Gas UK, in consultation with the unions, produced guidance for the industry. This will be jointly reviewed in 2010. HSE supports the production and application of this guidance. See <http://www.oilandgasuk.co.uk/issues/health/guidelines.pdf>

Consultation

35. The role of the safety representative as a consultee in the major hazard work environment is also important. In most instances, the implementation of an effective consultation system will generate the worker involvement that improves health and safety performance and raises standards. Inspectors should concentrate on ensuring that consultation arrangements are in place and are being used.

36. SI971 places a **statutory duty** on duty holders to consult with safety representatives on the revision, review or preparation of the safety case.
(Reg. 23 c) A summary of the arrangements for such consultation must be included in the safety case. This requirement was introduced in SCR05 (Offshore Installations (safety Case) Regulation 2005) and duty holders were given until April 2009 to revise safety cases in this respect. Inspectors will be testing compliance with this consultation requirement and can ask to see safety cases at any time to check that they are up to date.

37. Inspectors will speak to managers and particularly workers about:

- What consultation currently takes place;
- Whether workers are involved in health and safety decision-making;
- How these processes occur.

They should also check the safety case to see what is stated by way of a summary of consultation arrangements.

38. The level of importance an organisation attaches to consultation might be evident by the way in which success is measured.

Enforcement of the Regulations

39. HSE has a duty to enforce regulations and to take appropriate enforcement action where duty holders fail to comply with the requirements. Decisions on what constitutes appropriate action will be made in line with the basic principles of proportionality, consistency, transparency and targeting. HSE's Enforcement Management Model (EMM) will apply.

BEYOND THE LAW: INVOLVING WORKERS

Towards full involvement of the workforce

40. All organisations should aim for **full participation of the workforce** in management of health and safety. This flows from a full and effective consultation process and whilst not an enforceable legal requirement, is the vital extra element that produces significant improvements in health and safety performance.

41. In most organisations, effective consultation arrangements will be sufficient to produce improvements in health and safety performance. In organisations with established, sophisticated consultation arrangements, where management may be at arm's length from work processes, fuller discussion of worker involvement is appropriate to deliver further improvements.

42. The key development from the consultation process is the full participation of the worker (or their representative) to actively participate in joint problem-solving of health and safety issues. In this manner, health and safety becomes a shared issue handled through a process of common agreement and trust, evolving from the consultation process. This does not mean that health and safety management responsibilities can simply be delegated to the workforce – managers must still manage health and safety.

Promoting the benefits of worker consultation and involvement

43. There is no one, definitively best system for worker involvement. It is important that managers and workers develop a best fit for their own organisations.

44. For employers, key issues are likely to be:

- The cost of involving workers in resource and productivity terms;
- An ignorance of the value of worker involvement, and a belief that workers will not wish to be involved; and
- Ignorance of sources of advice and guidance.

45. For workers, key obstacles have been identified as:

- A belief that they will be 'punished' for criticising management practice;
- A lack of communication skills and a lack of confidence in dealing with management;
- An ignorance of the value of worker involvement – a belief that management will not involve workers, and that health and safety is a "common sense" matter for individuals.

SI971 INSPECTION PROGRAMME METHODOLOGY

46. This programme will inspect against compliance with SI971 provisions.
47. It is intended that every Duty Holder will undergo at least one SI971 inspection on one of their installations.
48. Offshore inspection templates have been produced to cover the main aspects of the regulations and should be used to ensure a consistent approach across the installations inspected, they cover:
- Safety representative, constituencies & election process etc;
 - Functions and powers of safety representatives;
 - Safety committees;
 - Duties of installation operators and owners, and employers;
 - Time off and training.
49. Inspections are to be reported against the template items and include:
- Deficiencies found and actions to be taken; and
Examples of best industry practice.
50. Findings are to be reported and coded in line with the 'Traffic Light System', this should ensure consistency of approach with other OSD activities.

Traffic Light System

Action Taken Resulting From Intervention Activity	Compliance Level	Outcome Status	'Traffic Light'
No findings or	General compliance	1	GREEN
Verbal advice		2	GREEN
SPC/ENF/166 format letter issued identifying breaches and requiring action to be taken. No significant change made to intervention plan to follow-up issues (eg follow-up via future planned intervention activity)	Partial compliance	3	YELLOW
SPC/ENF/166 format letter issued identifying breaches and requiring action to be taken. Changes made to intervention plan to follow-up the issues (eg additional unplanned intervention activity) And/or Enforcement Notices considered but not served (eg EMM dutyholder factors modified initial enforcement expectation)	General non-compliance	4	ORANGE
Enforcement Notice Served	Significant non-compliance	5	RED
Court proceedings recommended	Serious non-compliance	6	

51. Inspectors should aim to speak with:
- All safety representatives present on the installation at the time of the inspection – this should ensure a cross section of those safety representatives employed by the duty holder and, where relevant, contractors;
 - The OIM as a representative of the Duty Holder and provider of facilities;
 - Any other member(s) of the safety committee;
 - Members of the workforce.

52. Inspectors will look for examples of good practice and feed these back in detail to the Chair of the OIAC Workforce Involvement Group (WIG) so that they can be shared and potentially be included in guidance aimed at assisting industry.

ADDITIONAL RESOURCES

Publications

L110 A Guide to the Offshore Installations (Safety Representatives and Safety Committees) Regulations 1989.

[IND\(G\) 119 Safety representatives and safety committees on offshore installations.](#)

Websites:

www.hse.gov.uk/aboutus/meetings/iacs/oiac/wig.htm

<http://www.hse.gov.uk/involvement/index.htm>

<http://www.hse.gov.uk/offshore/workinvolvement.htm>

<http://www.hse.gov.uk/involvement/casestudies.htm>

<http://www.hse.gov.uk/workers/index.htm>

<http://www.hse.gov.uk/workers/safetyreps/index.htm>

<http://www.acas.org.uk/index.aspx?articleid=338>

Research Reports:

[RR363 The role and effectiveness of safety representatives in influencing workplace health and safety.](#)

[CRR01/321 The impact of trade union education and training in health and safety on the workplace activity of health and safety representatives](#)

[HSL/2005/09 Workforce participation in the management of occupational health and safety.](#)

[RR296 Obstacles preventing employee involvement in health and safety.](#)

[WPS/00/03 Employee involvement in health and safety: Some examples of good practice.](#)

OFFSHORE INSPECTION TEMPLATE

Inspection Template Sections

1. Safety Representatives, constituencies & election process etc
2. Functions and powers of safety representatives
3. Safety committees
4. Duties of installation operators and owners, and employers
5. Time off and training

1. Safety representatives, constituencies & election process etc

Objective:

To establish that adequate arrangements are in place to elect safety representatives in line with the requirements in SI971.

Background:

Regulations 4 – 15 lay out prescriptive requirements for the establishment of a regime for safety representatives, constituencies & the election process. This sets out the formal arrangements for workforce involvement offshore.

Evidence required:

Documents providing information on the following:

- constituency system,
- constituency members,
- nominations and candidates,
- ballots and results.

Discussion with OIM and safety representatives.

Relevant legislation:

SI971 Offshore Installations (Safety Representatives and Safety Committees)
Regulations 1989

INSPECTION NOTES:	1. Safety representatives, constituencies & election process etc
<p>To be: <i>assessed for adequacy; and verified for compliance (using the sample installation):</i></p>	
<p>1. Reg 4 – Election of safety representatives a) Are there elected Safety Representatives? (SRs) Who are they?</p>	
<p>2. Reg 5 – Constituencies a) Have constituencies been established and how are they defined? e.g. by area / activity / employer / other? b) Are there a minimum of 2 constituencies? Are there not more than 40 and not fewer than 3 persons in each constituency? c) Are constituencies posted in a suitable place on the installation? d) If not, is an alternative, suitable and effective measure in place?</p>	
<p>3. Reg 6 – Members of constituencies a) Is every member of the workforce assigned to a constituency? b) Are new members assigned to a constituency and informed in writing? (Not required if stay is <48 hours) c) Is the SR informed in writing of new members of the constituency? If not, is an alternative, suitable and effective measure in place? d) If not, is an alternative, suitable and effective measure in place?</p>	
<p>4. Reg 7 / 8 / 9 / 10 – Elections / nominations / candidates / list of candidates a) Are elections held? e.g. for new constituencies, when SR in post for >2years or when SR resigns or leaves platform for > 12 weeks? b) Are notices posted inviting nominations for SR candidates? c) Is it confirmed that candidates nominated are willing to stand and seconded? d) Are candidates given reasonable facilities to promote their election campaign? e) Is a list of duly nominated candidates or the existence of a vacancy displayed? f) If not, is an alternative, suitable and effective measure in place?</p>	

5. Reg 11 / 12 – Secret ballot / results
 a) If more than 1 candidate is nominated is a secret ballot conducted?
 b) Are results posted in a suitable location within 1 week of the election?
 c) Is the successful candidate notified in writing of his / her election and the constituency s/he represents?

6. Reg 13 / 14 / 15 – No candidate / cessation of representation / single employer constituencies
 a) Where no candidate is identified is a list of constituency members posted and updated monthly?
 b) Are constituents aware they can be nominated and an election be held?
 c) Do SRs remain in office for 2 years or until resignation, termination of employment or absence for > 12 weeks?
 d) Where SRs represent constituents from a single employer they may move installations without re-election, has this happened?

Additional comments including examples of good practice:

SERIOUS NON-COMPLIANCE	SIGNIFICANT NON-COMPLIANCE	GENERAL NON-COMPLIANCE	PARTIAL COMPLIANCE	GENERAL COMPLIANCE	GENERAL COMPLIANCE	NOT INSPECTED
Court proceedings recommended	Enforcement Notice Served	Letter & changes made to intervention plan &/or EN considered but not served	Letter	Verbal advice	No findings	

Action taken:

2. Functions and powers of safety representatives

Objective:

To establish whether safety representatives are aware of their functions and their powers and whether they choose to use them.

Background:

Regulations 16 - 18A lay out details of the functions and powers bestowed upon safety representatives, these are not duties but should give safety representatives sufficient guidance and standing to enable them to be effective.

Evidence required:

Discussion with safety representatives.

Relevant legislation:

SI971 Offshore Installations (Safety Representatives and Safety Committees)
Regulations 1989

INSPECTION NOTES:	2. Functions and powers of safety representatives
<p>To be: <i>assessed for knowledge; and verified for compliance (using the sample installation)</i></p>	
<p>1. Reg 16 – Functions of safety representatives The scope of the SRs function is defined and detailed below:</p> <ul style="list-style-type: none"> a) To investigate potential hazards and dangerous occurrences and examine causes of accidents where the interests of the workforce might be involved b) To investigate complaints c) To make representation to the OIM in relation to the above d) To attend safety committee meetings e) To represent constituency members in consultations with HM Inspectors of Health & Safety f) To consult members of his / her constituency <p>How are these functions carried out in practice and to what extent? What evidence is available to confirm this?</p>	
<p>2. Reg 17 - Powers of safety representatives The SRs have the powers:</p> <ul style="list-style-type: none"> a) To inspect any part of the installation or equipment b) Where there is an imminent risk of serious personal injury, to make representation to the duty holder who shall prepare a report for the HM Inspector of Health & Safety; in addition the SR may also choose to alert the inspector by the fastest practical means c) To receive information from the HM Inspector of Health & Safety <p>Have the SRs used these powers and to what extent. What evidence is available to confirm this?</p>	

3. Reg 18 / 18A – Documents

- a) Do SRs have access to all documents relating to the occupational health & safety of the workforce with the exception of personal health records? What have they looked at?
- b) Have SRs been supplied with a written summary of the main features of the safety case?
- c) Do SRs have access to the safety case and are they supplied with revisions?

Additional comments including examples of good practice:

SERIOUS NON-COMPLIANCE	SIGNIFICANT NON-COMPLIANCE	GENERAL NON-COMPLIANCE	PARTIAL COMPLIANCE	GENERAL COMPLIANCE	GENERAL COMPLIANCE	NOT INSPECTED
Court proceedings recommended	Enforcement Notice Served	Letter & changes made to intervention plan &/or EN considered but not served	Letter	Verbal advice	No findings	

Action taken:

3. Safety committees

Objective:

To establish whether Safety Committees exist and meetings are held in line with the requirements of SI971 and to determine the scope covered by the meetings.

Background:

Regulations 19 - 22 lay out requirements for the establishment of a safety committee, it's format and function.

Evidence required:

Documents providing information on the following:

- Timetable for past & future meetings,
- Agendas,
- Minutes.

Discussion with OIM (Chair), safety representatives & other committee members.
Discussion with offshore workforce.

Relevant legislation:

SI971 Offshore Installations (Safety Representatives and Safety Committees)
Regulations 1989

INSPECTION NOTES:	3. Safety Committees
<p>To be: <i>assessed for adequacy; and verified for compliance (using the sample installation)</i></p>	
<p>1. Reg 19 / 20 - Safety committees: establishment / membership</p> <ul style="list-style-type: none"> a) Has a safety committee been established? b) What is the membership of the committee? OIM (chair), another DH appointee, safety representatives? c) Are there any co-opted members? Have these been agreed unanimously? 	
<p>2. Reg 21 - Safety committees: meetings</p> <ul style="list-style-type: none"> a) How often are meetings held? (Minimum 3 monthly) b) Does the planning of the meetings enable maximum attendance? c) Are all SRs viewed equally? E.g. staff / contractors d) Do SRs send deputies if they cannot attend? e) Are meetings postponed if there is not a quorum? 	
<p>3. Reg 21 contd – Safety committee meetings: format and agenda</p> <p>Do the meeting agendas / minutes show evidence of covering the following as a minimum?</p> <ul style="list-style-type: none"> a) Feedback from onshore regarding previous meeting, b) Incidents since previous committee meeting, c) Incidents or hazards to health on other installations operated by the same DH, d) Any major changes in equipments or operating methods, e) Anything else which could affect the H&S of the people working on the installation. 	

4. Reg 22 – Safety committee functions

Are the safety committee members aware of the meeting functions as defined in the regulations –

To keep under review:

- a) measures taken to ensure H&S of the workforce
- b) the system of constituencies to ensure adequate representation
- c) training arrangements for the safety representatives
- d) frequency of the meetings

To consider:

- e) representations from any committee member on any matter concerning workforce H& S
- f) causes of accidents, dangerous occurrences and causes of occupational ill health
- g) documents relating to occupational H&S of the workforce

To prepare and maintain a record of business.

The committee shall also seek to advance co-operation between all parties on the installation.

Additional comments including examples of good practice:

SERIOUS NON-COMPLIANCE	SIGNIFICANT NON-COMPLIANCE	GENERAL NON-COMPLIANCE	PARTIAL COMPLIANCE	GENERAL COMPLIANCE	GENERAL COMPLIANCE	NOT INSPECTED
Court proceedings recommended	Enforcement Notice Served	Letter & changes made to intervention plan &/or EN considered but not served	Letter	Verbal advice	No findings	

Action taken:

4. Duties of installation operators and owners, and employers

Objective:

To establish whether operators, owners and employers are making the necessary provisions required under the regulations to enable the safety representatives to be effective.

Background:

Regulations 23 - 25 lay out the duties imposed upon operators and owners, and employers, in relation to the provision of facilities, consultation, availability of information and documents for safety representatives.

Evidence required:

Discussion with safety representatives and OIM.

Relevant legislation:

SI971 Offshore Installations (Safety Representatives and Safety Committees)
Regulations 1989

INSPECTION NOTES:	4. Duties of installation operators and owners, and employers
<p><i>To be: assessed for adequacy; and verified for compliance (using the sample installation)</i></p>	
<p>1. Reg 23- Duties of installation operators and owners, and employers: facilities Does the duty holder provide adequate facilities, necessary accommodation, facilities for communication and office equipment?</p>	
<p>2. Reg 23 contd - Duties of installation operators etc: consultation Does the duty holder consult the SRs with regard to maintaining, promoting and developing H&S arrangements?</p>	
<p>3. Reg 23 contd - Duties of installation operators etc: safety case Does the duty holder consult the SRs with regard to preparation, review or changes to the Safety Case?</p>	
<p>4. Reg 24 – Information Does the duty holder make available information relating to occupational health & safety e.g.</p> <ul style="list-style-type: none"> a) plans and performance of activities on the installation b) information relating to installations connected to the installation c) results of measures taken to check effectiveness of H&S arrangements d) information about hazards to H&S and precautions e) incidents and statistical records 	

<p>5. Reg 25 – Documents</p> <p>a) Does the duty holder make safety case documents and the facilities necessary to view them available?</p> <p>b) Is there a copy of the Offshore Installations (Safety Representatives and Safety Committees) Regulations 1989 on board the installation?</p>
<p>Additional comments including examples of good practice:</p>

SERIOUS NON-COMPLIANCE	SIGNIFICANT NON-COMPLIANCE	GENERAL NON-COMPLIANCE	PARTIAL COMPLIANCE	GENERAL COMPLIANCE	GENERAL COMPLIANCE	NOT INSPECTED
Court proceedings recommended	Enforcement Notice Served	Letter & changes made to intervention plan &/or EN considered but not served	Letter	Verbal advice	No findings	

<p>Action taken:</p>

5. Time off and training

Objective:

To establish the level of time off and training given to safety representatives and how this complies with the requirements of the regulations.

Background:

Regulations 26 & 27 lay out the requirements for time off and training for safety representatives.

Evidence required:

Documentation providing information on:

- Training courses provided and relevant content,
- Training records for each safety representative.

Discussion with safety representatives and OIM.

Relevant legislation:

SI971 Offshore Installations (Safety Representatives and Safety Committees)
Regulations 1989

INSPECTION NOTES:	5. Time off and training
<p><i>To be: assessed for adequacy; and verified for compliance (using the sample installation)</i></p>	
<p>1. Reg 26 – Time off: for functional activity</p> <ul style="list-style-type: none"> a) Does the duty holder permit the SRs time off without loss of pay during working hours to allow them to carry out their functions? b) Are the provisions for SRs employed by contractors different to those employed by the dutyholder? 	
<p>2. Reg 26 contd – Time off: training</p> <ul style="list-style-type: none"> a) Do SR undertake training in there own time (i.e. during shore leave)? If so, do they get paid for this time for training? b) Are the provisions for SRs employed by contractors different to those employed by the dutyholder? 	
<p>3. Reg 27 – Training provision</p> <ul style="list-style-type: none"> a) What training is provided for the SRs? b) Have other training needs been identified by the SRs? c) What was the duty holder response? d) Are the provisions for SRs employed by contractors different to those employed by the dutyholder? 	
<p>4. Reg 27 – Training costs</p>	

- a) Does the duty holder promptly meet the costs associated with training?
- b) Does the duty holder promptly meet the costs associated with travel & subsistence?
- c) Are the provisions for SRs employed by contractors different to those employed by the dutyholder?
- d) Have any problems been identified?

Additional comments including examples of good practice:

SERIOUS NON-COMPLIANCE	SIGNIFICANT NON-COMPLIANCE	GENERAL NON-COMPLIANCE	PARTIAL COMPLIANCE	GENERAL COMPLIANCE	GENERAL COMPLIANCE	NOT INSPECTED
Court proceedings recommended	Enforcement Notice Served	Letter & changes made to intervention plan &/or EN considered but not served	Letter	Verbal advice	No findings	

Action taken: