Assessing safety cases and processing other submissions

Under the Offshore Installations (Safety Case) Regulations 2005 six types of submission may be made to HSE:

- safety cases (new and revised),
- design notifications,
- relocation notifications,
- combined operations notifications,
- thorough review summaries, and
- well operations notifications (not covered by SCHAM).

HSE’s Offshore Division (OSD) procedures for processing these submissions are provided here.

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The following guidance should be referred to where appropriate:

- Booklet L30 A guide to the Offshore Installation (Safety Case) Regulations 2005
- SPC/Enforcement/158 The Offshore Installations (Safety Case) Regulations 2005
- Assessment Principles for Offshore Safety Cases (APOSC)
- Guidance for the Topic Assessment of the Major Accident Hazard Aspects of Safety Cases (GASCET)
- Offshore Information Sheet 2/2006 Demonstrating compliance with the relevant statutory provisions
- Offshore Information Sheet 4/2006 Through review of a safety case
• Offshore Information Sheet 11/2007 HSE's involvement in the design and construction process (including processing of design notifications)
• Operations Notice 74 Submission of notifications, thorough review summaries and safety cases
• Guidance produced by topic teams
Section 1 Aims, objectives and principles

Introduction

1.1 Safety Cases are submitted to HSE in compliance with the Offshore Installations (Safety Case) Regulations 2005 [SCR]. This section describes the aims and objectives of assessment carried out by OSD, and the policy and principles underlying the process. Where appropriate, it also applies to handling notifications and thorough reviews.

Assessment aims

1.2 OSD's aims in carrying out safety case assessment are:

a. to contribute to OSD's overall mission of ensuring that risks to people from work activities in the upstream petroleum and diving industries are properly controlled;

b. to confirm whether or not a Safety Case contains sufficient particulars to enable OSD to reach an informed judgement that a satisfactory case for health and safety has been made;
c. to discharge on behalf of the Executive the responsibility for the acceptance of Safety Cases which provide a satisfactory case for health and safety;

d. to contribute to OSD's intervention strategy for individual installations and duty holders [with enforcement action where appropriate]; and

e. to contribute to the planning of OSD's programmes of health and safety compliance, promotion and research.

Assessment objectives

1.3 Assessment has the following objectives:

a. to identify, clarify and prioritise issues that may affect acceptance of the case, and to seek to resolve these issues with the duty holder;

b. to deliver a clear and timely acceptance/rejection recommendation to the decision-maker [IMT Operations Manager];

c. to provide clear and specific reasons where acceptance cannot be given; and

d. to inform OSD's future interventions.

Assessment policy

1.4 OSD assesses each case to the extent necessary to form a competent opinion on whether it should be accepted by the Executive. Procedures are provided for:

a. using HSE expertise to assess the adequacy of the information and demonstrations,

b. ensuring the consistency of assessment,

c. securing effective communication with duty holders to ensure that the implications of OSD concerns for the acceptance decision are transparent to duty holders,

d. transmitting timely decisions on case acceptance to duty holders and safety representatives, and

e. maintaining an auditable record of the assessment process for each safety case.

1.5 OSD treats each assessment as a single, multi-disciplined evaluation conducted within a specified timescale, which is also part of a continuing process of intervention during the lifetime of the installation. OSD manages the making of acceptance decisions with great care. Assessment has to be objective, but it is a targeted, interactive process with the duty holder which involves the exercise of professional judgement by inspectors within the framework of the guidance.

1.6 Safety Cases when submitted must have enough information and sufficient particulars to ensure a good prospect of assessment and possible acceptance. Where this not so, the Safety Case should be returned to the duty holder. Case manager (CM): See Section 3 paragraph 3.18 for further details. It is not the role of assessors to write or edit safety cases.
Assessment principles

1.7 Assessment is based on six principles:

(i) Acceptance is a legal decision informed by multi-disciplinary input.

The decision on acceptance of a Safety Case flows from individual specialist contributions in a range of topic areas, and which respects the professional integrity of all staff. This system is formal and transparent to allow justification of HSE’s decision.

(ii) Procedures and guidance seek to encourage consensus decision-making.

These are designed to ensure, through teamwork and sound project management, that legal or technical issues that are crucial to decision making are properly identified, examined and weighed. Assessors are required to make competent and timely contributions to the raising and resolution of issues, and to provide assessment completion reports. This may require appropriate and early contact with the duty holder's topic experts.

(iii) Assessments are undertaken in accordance with an agreed assessment brief. See Section 3 paragraphs 3.23 and 3.24.

(iv) Assessment completion reports draw conclusions regarding the adequacy of the information and demonstrations presented.

(v) The case manager makes a recommendation to their operations manager on the acceptability of the case.

This takes account of the views [both positive and negative] expressed by assessors, of compliance with legal requirements, and of the case made for health and safety as a whole. Any concerns are thoroughly discussed by those involved, with a view to resolving them before the case closeout report is prepared. The case manager consults the Legal and Operational Strategy Team on any legal queries. Any failure to reach a resolution is referred to operations managers without delay.

(vi) Acceptance is a statutory process and is adequately documented before acceptance is given to, or withheld from, the duty holder.

Acceptance criteria

1.8 It is not desirable in a goal-setting regime to have a single model of an acceptable Safety Case, as absolute standards of acceptability cannot be laid down. Each case is judged on its own merits against the major accident risks to the workforce. The acceptance decision must however stand up to scrutiny.

1.9 The operations manager will decide whether a case can be accepted using the following criteria:
1) in respect of major accident hazards, there is no prima facie evidence of non-compliance with HSWA and the relevant statutory provisions [except for trivial aspects];
2) the Safety Case contains all the factual information required by the regulations;
3) the demonstrations required by the regulations are not deficient. A demonstration is deficient if any of the following apply:
   a) the relevant assessment principles in APOSC are not taken account of in the Safety Case;
   b) the management system described is unlikely to ensure compliance with the appropriate relevant statutory provisions or satisfactory management of arrangements with contractors and sub-contractors;
   c) the audit and audit reporting arrangements described are unlikely to achieve the objectives of a safety management auditing scheme;
   d) there are inadequacies in the potential major accident hazard identification and risk assessment process which are likely to render the basis for risk management decisions invalid; or
   e) the risk control measures taken, or proposed to be taken, are unlikely to ensure compliance with the relevant statutory provisions.

Explaining the reasons for non-acceptance

1.10 The responsibility for ensuring that a Safety Case satisfies the regulations rests with the duty holder. However, where HSE concludes that the case does not meet the requirements and cannot be accepted, HSE has a responsibility to explain to the duty holder what the deficiencies are and what needs to be done to remedy them. This derives from HSE’s Enforcement Policy Statement and is in accordance with the Regulators’ Compliance Code and the regulatory principles required under the Legislative and Regulatory Reform Act 2006.

1.11 For example, a case may be considered unacceptable because of inadequacies in the major accident hazard identification and risk assessment process. The assessor will need to identify and describe the inadequacies and explain how they are likely to invalidate the risk management decisions or measures. Similarly where the risk control measures do not appear to achieve compliance with the relevant statutory provisions, the assessor will need to provide reasoned arguments in support of this view.

The role of good practice

1.12 In reaching any conclusion, assessors may refer to authoritative sources of established good practice, as well as to HSE’s own expertise. Much of HSE’s interpretation of offshore good practice is in the publication Guidance for the topic assessment of the major accident hazard aspects of Safety Cases [GASCET] [PDF 2.15MB]. Assessors may take into consideration a technical standard, before concluding that risks have not, or will not, be reduced to the lowest level that is reasonably practicable. Account should also be taken of HSE’s ALARP guidance suite in deciding what is reasonably practicable, in particular the document Assessing Compliance with the Law in Individual Cases and the Use of Good Practice and Offshore Information Sheet 2/2006 Offshore Installations (Safety
Sufficiency of safety case contents

1.13 A sufficient case is one that contains the information specified in Regulation 12 and the relevant Schedule, thereby enabling OSD to decide if the document contains a satisfactory case for health and safety.

1.14 Arriving at this judgment does not demand ever-increasing analysis or requests for information. It requires that sufficient particulars have been provided to support the goal of the Regulations, in particular with Regulation 12(1)(d) regarding compliance with the relevant statutory provisions.

1.15 Assessment of a demonstration is not a mechanical exercise using a checklist to see whether items are present in a given situation. The object of the exercise is to gain an overall picture from the information in the case, by sampling and making a considered, informed, qualitative appreciation of the whole. It is a matter of evaluation of the overall effect of the detail, which may vary in importance in a given situation, and from one situation to another.

1.16 Assessors also use their own knowledge in deciding whether the particulars are sufficient. However, where a Safety Case is deficient because it fails to include relevant information which the assessor knows could have been included, the deficiency must be remedied by including the information in the Safety Case before it can be accepted.

Assessor judgement

1.17 Assessment can involve forming a view on finely balanced arguments. The conclusion drawn, based on the information provided, must be reasonable.

1.18 When there is a difference of view between the assessor and their manager or other assessors, the procedures in paragraph 1.22 for resolving differences should be followed.

Existing knowledge and further studies

1.19 An assessor's conclusions should only take account of information provided in the light of current knowledge and invention. This includes knowledge that is newly arisen, for example information published since the previous version of the Safety Case. Care should be taken to avoid using the assessment process to impose higher requirements that are not yet established or incorporated into standards and guidance.

1.20 Assessors should not be influenced by views on technical knowledge that might emerge from current or planned research [although a lack of research or studies may amount to a gap in the demonstration to be made].

1.21 There may be a need to extend current technical knowledge to see if, in the future, additional risk reduction measures could be taken. This might involve further studies by the duty holder. This need not prevent acceptance of the Safety Case in the meantime. It
should be made clear to the duty holder that the carrying out of further studies is not a condition of acceptance. Further studies should be encouraged, as they help to discharge the duty holder's responsibilities for continuous improvement, by systematically looking for ways of reducing risks. The results may eventually need to be incorporated in a revision of the Safety Case. Assessors will therefore need to follow up such work as part of the intervention programme.

**Resolving differences of professional view**

1.22 Where consensus cannot be achieved, the following action is taken:

- Case manager [or topic manager for differences between or within topic teams]
  1) ask the parties involved to record their views on a case note,
  2) hold a meeting between the parties to try to resolve the issue, invite third parties to contribute where appropriate, and
  3) record a summary of the meeting and its outcome on a case note.

If agreement is not reached, refer the issue(s) to the relevant operations manager(s).

Operations managers:

If necessary, hold further discussions to try to resolve the issue. Record such discussions on case notes. Where appropriate ask another operations manager [with no previous involvement in the case] to suggest possible means of resolution. This may involve discussions with other case managers or topic specialists, to form a second opinion. For further details please see [formal second opinion procedure](#).

The operations manager responsible for the acceptance decision then decides on how the difference is to be resolved, consulting the Head of Division if appropriate. For differences within a topic team, their operations manager decides on the line to take.

**Legal aspects**

1.23 For guidance on the application and interpretation of the regulations, see [SPC/Enforcement/158](#).

1.24 SCR Regulation 12 requires a demonstration that measures have been, or will be, taken to ensure compliance with the relevant statutory provisions. Where the statutory requirement is as low as reasonably practicable (ALARP), a lower standard of protection than would be provided by the application of currently accepted good practice would not normally be acceptable. See also [SPC/Permissioning/39 on HID’s approach to ALARP decisions](#), and [Offshore Information Sheet 2/2006 on demonstrating compliance with the relevant statutory provisions](#).

1.25 Requests for exemptions from the requirements of SCR under Regulation 23 are handled as part of assessment activity. The arrangements are described in [SPC/Enforcement/158](#) and the Offshore Intervention Guide – Exemptions and Approvals. The guidance also describes the procedure for dealing with requests from duty holders for
approval under Regulation 7(3) to submit one safety case for more than one production installation.

**Arrangements for implementation**

1.26 To secure compliance with OSD aims, objectives and principles, the safety case handling and assessment system has been established. It consists of SCHAM, certain elements of COIN and of the intervention planning system, and the published APOSC [PDF 158KB] and GASCET [PDF 2.15MB] guidance.

1.27 This manual details those responsible in OSD for the management of the assessment process, the authority given to individuals and the procedures and guidance they follow.

**Quality assurance**

1.28 The operation of the Safety Case system is monitored by line management, and performance is periodically scrutinised by the Divisional Management Team. The aim is to promote continuous improvement of each element of the system, and to ensure that it meets the needs of the various stakeholders and is integrated with OSD's other intervention activities.

1.29 Review and update is the responsibility of the Legal and Operational Strategy Team. The system is also subject to internal audit.

1.30 User input to the system is via the Safety Case Assessment System User Group, SCASUG. This provides feedback on the implementation of the system and suggests improvements. It meets as required/decided by OSD management.

1.31 The roles and responsibilities of these bodies are described in section 2.

**Guidance for assessors**

1.32 Guidance for the assessment of Safety Cases is in the published HSE APOSC [PDF 158KB] document. This document provides a framework for the consistent exercise of professional judgement by inspectors during the assessment process. It is backed up by detailed topic guidance provided by topic teams and GASCET [PDF 2.15MB].
IT systems

1.33 The COIN IT System supports the assessment process by containing a permanent record of written communications prepared by OSD, and either contains written communications from the duty holder or references to their location. It also provides audit data.

Training

1.34 A wide range of competencies is required to ensure Safety Cases are handled and assessed efficiently and effectively. Technical, procedural and IT training for all of those involved will be provided.

Formal second opinion procedure

1.35 The formal second opinion (FSO) procedure is an important part of ensuring that OSD maintains high standards of assessment decision-making. It is shown in Figure 1 and described below.

1.36 The FSO procedure should be completed within two weeks and in any case by the date by which an acceptance decision has to be made. OMs shall ensure that the highest priority is given to providing sufficient resource when it is needed.

Purpose of an FSO

1.37 FSO is mainly intended for those instances where the decision on case acceptance is finely balanced, or where there has been a failure to resolve differences of professional view between a topic team and an IMT. The aim is to provide an independent second view on the issue(s) at stake, to assist the OM making the acceptance decision. This is done by reviewing the arguments used by those involved and seeking additional views from others who have had no involvement so far. It is not the FSO's function to make the decision.

FSO Procedure

1.38 Only the OM responsible for making the acceptance decision may initiate the FSO procedure. All relevant OMs shall be consulted beforehand.

1.39 An OM who has had no direct involvement with the assessment of the case in question shall undertake the FSO process. This person is the 'FSO OM' and shall be commissioned by the OM initiating the FSO.

1.40 The FSO OM shall, as appropriate, enlist the assistance of:

a. a case manager who has had no direct involvement in the assessment of the case,
b. an appropriate topic specialist from OSD or another part of HSE who has had no direct involvement in the assessment of the case,
c. a person to act as secretary,
d. an adviser from the Legal and Operational Strategy Team (if necessary).
1.41 The selection should be made with care, and be agreed by the OMs involved in the case assessment.

1.42 The OM invoking the FSO shall initiate it by a case note to the CM, copied to the other OM involved and to the HoD. This shall be done as early as possible in the overall assessment process.

1.43 The OM requesting the FSO, assisted by the SCC, shall provide information as follows:

1. the name and COIN number of the case,
2. where the purpose of the FSO is to resolve a difference of professional view, the case notes relevant to attempts to resolve the issue,
3. where the purpose of the FSO is to reach a decision on cases where acceptance is finely balanced, the relevant case notes, issue notes and duty holder responses,
4. a summary of the issue(s) involved and how they have arisen,
5. the date by which a decision on the way forward must be taken,
6. the name of someone who can supply copies of all of the information considered by the assessment team.

1.44 The DCM and SCC shall supply copies of relevant information considered by the assessment team to the FSO OM.

1.45 Where an FSO is invoked as a result of a difference of professional view, the FSO OM shall consider:

a. the arguments of each party, as set out in the written material submitted to the FSO,
b. any necessary oral clarification from document authors, and
c. information and advice provided by staff enlisted to assist the process.

The OM shall then form a view on the line that OSD should take.

1.46 It is not the role of the FSO to resolve the differences. However if it becomes apparent that the differences can be resolved, the FSO OM shall try to secure a resolution by consulting the parties involved. If resolution is achieved then a report shall be sent by case note to the OMs involved and the CM, and action taken as in paragraph 1.22 above.

1.47 Where the purpose of the FSO is to assist the decision maker, the arguments regarding acceptance being finely balanced, the FSO OM shall consider:

a. the relevant information in the case [and, where appropriate, information provided in response to issue notes],
b. the relevant case assessment reports, and
c. any other information which either OSD or the duty holder might use to support their cases in a non-acceptance review by the Executive, or in an appeal to the Secretary of State.
The FSO OM shall use the information to consider if the acceptance criteria are met.

1.48 The FSO OM shall prepare a concise report highlighting:

   a. the information that was reviewed,
   b. those who assisted in the FSO process,
   c. the formal second opinion, and the reasons for it, and
   d. aspects of the information that might be strengthened by further OSD activity.

1.49 If the FSO was invoked as a result of a difference of professional view then the FSO OM shall consult the parties involved before finalising the report.

1.50 The opinion shall be submitted by case note to the OM requesting the FSO, and copied to any other OM involved, at the earliest possible date, and by the date by which a decision on the way forward must be taken.

1.51 The OM responsible for the acceptance decision shall note the outcome of the FSO when making the decision, and may consult the CM and the topic OM.

1.52 If any OM has concerns about the FSO, the OM making the acceptance decision shall advise the HoD once the decision has been made.

**FSO Records**

1.53 The DCM shall include a summary of the issue(s), the FSO report and the decision made in the case close out report.
Figure 1 - Procedure for formal second opinion

OM (acceptance) consults all relevant OMs before commissioning FSO by case note to the CM

OM (acceptance) appoints FSO OM

FSO OM enlists staff to assist

DCM/SCCs supply relevant information to FSO OM

FSO OM prepares FSO report and consults relevant OMs before finalising and delivering to OM (acceptance) by case note

OM (acceptance) takes account of FSO when making acceptance decision, and records on case note

OM (acceptance) briefs HoD if any OM cannot accept the FSO
Section 2 Roles and responsibilities

Introduction

2.1 This section outlines the roles and responsibilities of OSD staff for the assessment of Safety Cases, the inspection of reviews and notifications, and the handling of associated documentation. Line managers are responsible for the conduct of all activities in accordance with the performance standards, unless otherwise stated.

Head of Offshore Division

Role

2.2 To ensure that an effective policy for the Safety Case system is provided in support of OSD’s mission, and ensure its implementation.

Responsibilities

- Ensure effective policies are provided for the implementation of the Safety Case system.
- Ensure that such policies align with HSE policies for permissioning.
- Ensure that an organisational structure is in place to implement the Safety Case system.
- Maintain effective communication links with industry bodies, trade unions, other government bodies and other stakeholders on the Safety Case system.
Accountable operations manager for the safety case system

Role

2.3 To manage and monitor the implementation and development of the Safety Case system, as an integral part of OSD’s intervention strategy.

Responsibilities

- Develop, maintain and periodically review the safety case system. This will include:
  - Ensuring appropriate operational policy and guidance is available to staff,
  - ensuring the Safety Case system is fit for purpose,
  - monitoring the arrangements to capture the views and experience of system users, and
  - monitoring the implementation of SCHAM, the planning system and COIN.
- Ensure the quality and overall progress of Safety Case system activities in accordance with SCHAM performance standards.
- Ensure adequate arrangements are made for the competence of OSD staff using the Safety Case system.
- Ensure effective interfaces exist between the Safety Case system, and the inspection and enforcement processes.
- Represent OSD in discussions with industry associations on Safety Case matters.

Operations managers (inspection teams)

Role

2.4 Manage unit resources to ensure adequate availability to meet Safety Case plans and timetables.

Responsibilities

- Take responsibility for the regulatory decisions made within the unit and the quality of the work produced.
- Supervise the development and implementation of unit arrangements for the Safety Case system to meet SCHAM requirements.
- Ensure compliance with the requirements of the Safety Case system, including control and quality of documentation, COIN records and adherence to performance standards.
- Participate in the process to resolve differences of view as required.
- Decide on the acceptability of a Safety Case.
- Ensure the activity is managed to a consistent, auditable standard in compliance with SCHAM procedures.

For design/relocation notifications

- Where there are issues that might affect acceptance of the operational Safety Case, write to the duty holder to inform them of HSE’s views.

For directed reviews and revisions
• Consult the Head of Division (HoD).
• Write to the duty holder informing them of the direction.
• If the decision is to suspend a Safety Case brief the HoD.
• Write to the duty holder to inform them of a suspension.

Case manager

Role

2.5 To manage assessment of allocated Safety Cases.

Responsibilities

• Manage the multi-disciplined assessment activity.
• Appoint for each Safety Case a suitable deputy case manager (DCM), or act in that capacity.
• Approve assessment briefs.
• Monitor assessment progress against the key dates in assessment briefs and implement corrective measures as appropriate.
• Negotiate with topic managers to ensure that adequate resources are available for the assigned level of assessment work as appropriate.
• Approve level 1 issue notes, after informing relevant operations managers.
• Approve the closeout report at the end of assessment and make the acceptance/rejection recommendation to the operations manager.
• Participate in the process to resolve differences of view as required.
• Ensure assessment activity is carried out in accordance with SCHAM.
• Communicate with other case managers to monitor consistency and quality of assessment approach, reporting through line management.

Deputy case manager

Role

2.6 To manage topic assessor input to individual Safety Cases.

Responsibilities

• Obtain advance information on proposed Safety Case submissions from duty holders and inform the Safety Case Co-ordinator (SCC).
• Undertake an initial review of every Safety Case.
• Develop and agree assessment briefs.
• Where appropriate, assess the SMS and verification topics in the Safety Case using APOSC and relevant topic guidance, inform the case manager of the findings of the assessment and of the adequacy of the duty holder’s responses to issues raised, and document the assessment.
• Conduct and facilitate discussions with the duty holder on Safety Case matters.
• Undertake and record an assessment stocktaking review with topic managers.
• Prepare the closeout report.
Safety Case co-ordinator (inspection teams)

Role

2.7 To act as the focus for receipt and timely distribution of Safety Cases, thorough reviews and notifications, and to assist case managers and DCMs in their Safety Case system activity, in accordance with the performance standards.

Responsibilities (as allocated)

- Receive and record Safety Cases, thorough reviews and notifications from duty holders, including monitoring the dedicated email account, SCR05@hse.gsi.gov.uk, for submissions on a daily basis.
- Acknowledge receipt of Safety Cases, notifications and thorough reviews.
- Create COIN cases for all Safety Cases, thorough reviews and notifications, and service orders as required.
- Distribute copies to assessment team members or inspectors in accordance with the Safety Case plan/installation list and SCHAM.
- In the case of combined operations notifications, inform all IMT focal point inspectors for all installations involved of receipt.
- Provide support to COIN users regarding Safety Case system activity.
- Secure the long term archiving of Safety Cases and implement the HSE retention policy for such records.
- Obtain early information on planned Safety Case submissions, notifications and thorough reviews from deputy case managers and advise the Safety Case plan co-ordinator.
- Prepare duty holder letters, using standard templates where provided.
- Assist DCMs in distribution of assessment briefs.
- Process and distribute Safety Case system correspondence.
- Monitor and, as necessary, record assessment and inspection progress against key dates.
- Arrange meetings and provide support.
- Assist in raising issues, eg drafting documents.
- Input documents into COIN as instructed.
- Liaise with topic teams to facilitate timely receipt of their reports.
- Assist the DCM in preparation of closeout reports.
- Prepare closeout pack.
- Prepare the assessment decision letter and deliver it to the OM.
- Collate information as required to assist in resolving differences of view procedures.
- Update and finalise COIN records when assessment is complete.
Operations manager (topic teams)

Role

2.8 To manage unit resources to ensure timely completion of sufficient assessment and inspection in accordance with SCHAM performance standards. Note: The operations manager for pipelines is the HID SI3 Gas and Pipelines Head of Unit.

Responsibilities

- Take responsibility for the technical opinions given by the unit and the quality of work produced.
- Supervise the development and implementation of unit arrangements for the Safety Case system to meet SCHAM requirements.
- Manage resources to ensure adequate availability to meet Safety Case plans and timetables.
- Ensure compliance with the requirements of the Safety Case system, including control and quality of documentation, COIN records and adherence to performance standards.
- Participate in the process to resolve differences of view as required.
- Ensure adequate guidance is available to topic assessors on the technical requirements for an acceptable Safety Case.
- Ensure that activity is carried out to a consistent, auditable standard in compliance with SCHAM procedures and topic guidance.
- Participate in the FSO process if required.

Topic manager

2.9 The topic manager is the line manager of the topic assessor. The topic manager may also undertake an assessor role.

Role

2.10 To manage assessor input to allocated Safety Case assessments, and inspections of thorough reviews and notifications in accordance with SCHAM.

Responsibilities

- Responsible for decisions on the adequacy of the relevant topic content of a Safety Case, notification or thorough review, on the raising of Level 1 issue notes and on the adequacy of duty holder responses to issues raised, based on advice from assessors.
- Monitor quality of work produced by topic assessors on behalf of their team against the guidance in APOSC and the relevant topic guidance such as GASCET.
- Agree assessment briefs for their topic.
- Approve assessment case notes and ensure that they are sent to the DCM by the 'issues raised' date given on the assessment brief.
- Draft level 1 issue notes in conjunction with the topic assessor.
- Liaise with other topic managers on assessment and inspection issues.
- Participate as necessary in assessment team meetings and meetings with the duty holder.
- Participate in the process to resolve differences of view as required.
- Ensure the topic assessor’s assessment completion report is complied and submitted in accordance with SCHAM.
- Approve the topic assessors’ assessment completion report.

**Topic assessor**

**Role**

2.11 To provide timely technical assessment, advice and opinion to the topic manager and the DCM within the allocated scope of assessment for individual Safety Cases.

**Responsibilities**

- Assess topics in the Safety Case to an agreed assessment brief, using APOSC and relevant topic guidance such as GASCET, inform the topic manager of the findings of the assessment and the adequacy of the duty holder’s responses to any issues raised, and document the assessment.
- Liaise with the topic manager and other topic assessors on assessment issues of common interest.
- Participate in the process to resolve differences of view as required.
- Participate in assessment team meetings and meetings with the duty holder, as agreed by the DCM.
- Assess duty holder responses to issues raised and advise the DCM and topic manager accordingly.
- Ensure all work within the assessment brief is recorded in the required format.
- Prepare an assessment completion report by the agreed deadline and forward it to the topic manager.
Team admin (topic teams)

Role

2.12 To assist topic managers and assessors in their Safety Case system activity in accordance with SCHAM.

Responsibilities (as allocated)

- Process and distribute Safety Case system correspondence.
- Monitor and facilitate progress against key dates.
- Arrange and provide support for meetings.
- Assist in the administration of the raising of issues, including drafting documentation.
- Input documents into COIN as instructed.
- Collate information as required to assist in resolving differences of view procedures.
- Update and finalise COIN records.

IMT team leaders

- Discuss with your operations manager and relevant topic teams if a directed review or revision is appropriate.
- Send letter setting out HSE’s views of a design notification to the duty holder.

IMT inspectors

- Screen notifications for SCR requirements.
- Identify appropriate specialists to consider the notification.
- Facilitate dialogue with the duty holder.
- Arrange meetings with topic teams to agree responses or interventions where necessary.
- Ensure the duty holder is advised in writing of HSE’s views within 3 months of receipt.
- Ensure information is adequately recorded.
- For design/relocation notifications prepare an intervention plan for the installation.
- Prepare a closeout report.
- Prepare a letter to the duty holder setting out HSE’s views.
- For design/relocation notifications maintain contact with duty holder to ensure issues are effectively addressed.

For duty holder thorough review summary procedures:

- Obtain a copy of a duty holder’s procedure at least every 5 years, and inspect it.
- Consult topic teams for a view on the adequacy of the procedure for their topic.
- Discuss findings with the duty holder.
- Complete a report of the inspection of the duty holder’s procedure.

For thorough review summaries

- Ask relevant topic teams to inspect the summary.
- Inspect the summary.
- Collate any matters identified and update the intervention plan accordingly.
- Discuss any deficiencies with the duty holder.
- Complete a record of the inspection.
- Consider if a directed review is appropriate.
- In the event of failure of a duty holder to submit a thorough review summary use the direction procedure and consider enforcement action.

**IMT focal point inspectors (production installation) (for combined operations notifications)**

- Review the notification with the IMT focal point inspector(s) for the non-production installation(s).
- Consider the need to inspect the combined operation.
- Complete an inspection report.

**IMT focal point inspectors (non-production installation) (for combined operations notifications)**

- Review the notification with the IMT focal point inspector (production installation).
- Consider with the IMT focal point inspector (production installation) the need to inspect the combined operation.

**Topic inspectors**

- Inspect notifications for their topic.
- In consultation with the IMT focal point inspector for production installations consider the need to inspect a combined operation.
- Advise IMT inspectors of questions or requests for information from the duty holder.
- Consider responses from duty holders.
- Prepare a report of inspection of notifications.

For duty holder thorough review summary procedures:

- Consider the adequacy of the procedures for their topic.
- Advise the IMT focal point inspectors of any issues.

For thorough review summaries:

- Inspect the summary.
- Identify topics for future intervention.
- Identify any matters relating to potential non-compliance with major hazard legislation.
- Inspect technical aspects of documents etc produced by the duty holder to check the thoroughness of reviews if necessary.
- Complete the record of the topic inspection.

For directed reviews and revisions:

- If consulted, inform the IMT team leader of your views for your topic.
IMT team leader (production installation) (for combined operations notifications)

- Assign another inspector to deal with the notification if the focal point inspector is unavailable.

Operations manager (IMT)

- Sign and send letter to duty holder to advise them of HSE’s views

Safety case plan co-ordinator

Role

2.13 To maintain the Safety Case plan and installation list.

Responsibilities

- Operation, maintenance and development of the Safety Case plan.
- Updating the Safety Case plan weekly.
- Co-ordinate planning information to OSD management to assist them in effective Safety Case system handling, resource planning and allocation of staff to meet activity objectives.
- Obtain progress data from those involved in Safety Case system activity and summarise it for OSD.

Legal and operational strategy team

Role

2.14 To facilitate improvement initiatives for the Safety Case system.
Responsibilities

- Contribute to the improvement and review of the Safety Case system including monitoring the effectiveness of the procedures.
- Attend SCASUG meetings.
- Manage user input to the Safety Case system by acting as a focus for user comments and by consulting SCASUG.
- Contribute to staff training in Safety Case system procedures.

Safety case assessment user group (SCASUG)

Role

2.15 To stimulate and review changes to improve the effectiveness of the safety case system.

Responsibilities

- Canvass views of peers with regard to proposed changes in Safety Case system activity, including policy, organisation, procedures and IT systems, and ensure the accountable manager is made aware of those views.
- Comment on draft circulars and SCHAM revisions as appropriate.
- Ensure views of staff are fully and accurately represented at SCASUG meetings including suggestions for improvement in existing arrangements.
- Provide feedback to site staff with regard to the outcome of SCASUG meetings.
Introduction

3.1 This procedure describes the process of planning and implementing Safety Case assessment. Trim folder 1.9.3.692. contains the standard forms and letters, which should always be used. See also the guidance on recording Safety Cases in Section 11.

3.2 The procedure should be read in conjunction with the published guidance in Assessment Principles For Offshore Safety Cases (APOS), Guidance for the Assessment of the Major Accident Hazard Aspects of Safety Cases (GASCET) and in booklet L30. The guidance in APOS should be taken account of, to the extent necessary, to provide an adequate demonstration. See also the acceptance criteria in Section 1.

3.3 A directed revision should be assessed as a material change using the procedures in this section. Guidance on the criteria for deciding when it is appropriate to direct a revision is in section 8.

Assessment planning

Requirement for a case
3.4 Duty holders should identify the need to submit cases, in compliance with the Offshore Installations (Safety Case) Regulations 2005 (SCR). However, for planning purposes inspectors should seek to identify each requirement for a case, through their normal contact with operators and contractors. This includes start-up of new installations, movement of mobile installations, modifications to existing installations (or to their management arrangements) which require a material change to the Safety Case, and dismantlement. Further guidance on what constitutes a material change is available in Offshore Information Sheet 3/2011. All such events should be identified as early as possible by (or to) the inspection management team (IMT), to permit early discussion with the duty holder.

3.5 The case manager is the IMT leader responsible for the installation duty holder. As soon as an actual or potential case is identified, the case manager appoints a deputy case manager (DCM), to manage and control the assessment process. Appropriate work may be delegated to Safety Case Co-ordinators.

New production installations

3.6 The most effective time for HSE to influence health and safety is early in the project life, when change is most easily and cost-effectively implemented. The DCM for the operational case should establish early contact with the duty holder to address key design and operational issues (including concept selection), and Safety Case format, content and submission timing. Such contact should start well before the design notification submitted under Regulation 9. It should form part of the duty holder intervention strategy and intervention plan described in the Offshore Intervention Guide. Relevant topic teams, including the occupational health team, should be involved at an early stage.

Assessment planning

3.7 For planning reasons it is important that the type of case, and the regulation under which it is to be submitted, are determined by the IMT as early as possible. The DCM notifies the Safety Case Co-ordinator (SCC) of the likely or actual date of submission, and updates them with any changes.

Request for accelerated assessment

3.8 Requests may be received to assess cases in shorter times than the advance submission periods required by SCR, for example in less than 6 weeks for revision of a case relating to combined operations. The following principles apply;

a) no formal commitment to assessment in less than the advance submission timescales should be entered into,

b) requests for accelerated assessment for urgent safety reasons should be given high priority,

c) requests arising from commercial considerations should be treated pragmatically, without making commitments or encouraging economic or commercial advantage.
Key dates

3.9 The Safety Case plan includes key assessment dates for each case, based on Table 1 below. The assessment team should meet these dates, unless all parties agree there are good reasons for departing from them. The aim is to gather sufficient evidence to support an acceptance/rejection decision and notify it to the duty holder(s) and safety representatives by the 'acceptance decision' date. The DCM should alert their operations manager and the Safety Case Co-ordinator of any significant departure from the key dates.

3.10 All case notes should be recorded on COIN as they are raised. Issue notes should be recorded on COIN on the day they are sent to the duty holder. The status of the service order lines they are linked to should be updated to ‘Completed’ within 5 working days of case acceptance. Copies of correspondence from duty holders should be placed on COIN or on a registered file within 10 days of receipt or before the case record is closed on COIN if this is earlier. The case record should be kept up-to-date and changed to ‘Closed – Completed’ status within 5 working days of case acceptance.
### Table 1 case assessment key dates (relative to start date)

<table>
<thead>
<tr>
<th>SC type (Reg)</th>
<th>Assessment brief issued date</th>
<th>Issues raised date</th>
<th>Response from duty holder due date</th>
<th>Stocktaking checkpoint date</th>
<th>Topic assessment completion date</th>
<th>Acceptance decision date</th>
</tr>
</thead>
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<tr>
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<td>15</td>
<td>40</td>
<td>59</td>
<td>66</td>
<td>83</td>
<td>90</td>
</tr>
<tr>
<td>14(2)(a)(ii), 27(2)</td>
<td>10</td>
<td>21</td>
<td>28</td>
<td>31</td>
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<td>15(1)</td>
<td>15</td>
<td>40</td>
<td>59</td>
<td>66</td>
<td>83</td>
<td>90</td>
</tr>
</tbody>
</table>

### Receipt, registration and distribution

**Deputy case manager (DCM):**

3.11 Unless cases are submitted electronically in accordance with *Operations Notice 74*, ensure that the duty holder supplies sufficient paper copies of the Safety Case for all topic teams (currently 16). Agree any variation in the number or format of copies required with the duty holder, and pass this information to the SCC accordingly. Also inform the SCC of the proposed distribution of the case for assessment, where possible before receipt of the case. *Operations Notice 74* gives guidance to duty holders on submitting Safety Cases.

**Safety case co-ordinator (SCC)**

3.12 On receipt of a case in either electronic or hard copy format immediately update COIN records and arrange distribution of the case, using the case distribution case note (template 1). Retain one copy and mark it as the 'master original'. Hard copy cases are distributed by urgent parcel service, and recipients notified of dispatch, within one working day of receipt. The SCC should ensure that the dedicated email account for SCR submissions is monitored at least daily.

3.13 If it is not possible to identify the case manager quickly, distribute the case in accordance with the installation list.

3.14 Send a standard letter to the duty holder (template 8) to acknowledge receipt of the case and to provide the names of the case manager and the DCM and the key dates for 'issues' raised' and 'response from duty holder'. Record the letter on COIN.
3.15 If a submission is received by staff not based in Aberdeen, agree with them how to distribute the case and generate associated records and notifications of receipt.

3.16 Ensure that cases received are appropriately distributed, and registered files are established as required by local arrangements.

**Initial review**

*Deputy case manager:*

3.17 Carry out a review of the factual information in the case. The purpose of the review is:

   a. to check that the case broadly contains the information required by Regulation 12 and the relevant schedule, taking account of APOSC Principle 1, such that there is a good prospect of assessment and possible acceptance,
   b. for new cases, to review the outputs of the design notification [where required] and consider the extent to which they should be taken forward into assessment of the case,
   c. for cases submitted due to a material change, to identify the parts which have changed (or should have changed) since the previous submission, and
   d. for cases submitted due to a directed revision to identify the parts which have (or should have) changed.

If the case appears to be deficient inform the case manager (CM). The initial review should be completed before the Assessment brief issued date.

*Case manager (CM):*

3.18 If the information supplied is clearly deficient, such that an assessment is likely to give rise to a large number of Level 1 Issue notes, the CM is to consult relevant topic teams and the DCM on whether to recommend return of the case to the duty holder for amendment and re-submission. This has to be agreed with the Operations Manager (OM). Whatever action is decided record it and the reasons for it on a case note (template 2). This can be done at the initial review or in the early stages of topic assessment when it becomes evident that the case is deficient.

*Operations Manager (OM):*

3.19 If requested by the CM, decide whether the case should be returned on the grounds of lack of completeness.

**Assessment brief**

*DCM:*

3.20 After completion of the initial DCM review prepare an assessment brief case note (template 3).

A brief contains the following, where relevant:
1) Background information:
   a) a summary of changes from any previous submission, details of any material changes;
   b) any required revisions for Regulation 15 cases;
   c) any previous assessment history;
   d) Issues from previous assessments, notifications or pre-submission discussions;
   e) new knowledge that the duty holder could be expected to have taken account of.

2) Assessment recommendations:

Recommendations for the assessment scope of each topic, with justification that they represent an adequate assessment of the case. Should a topic area not be recommended for assessment, reasons must be given. The recommendations should take account of the type and complexity of the case. A new case for an installation in a novel configuration may require detailed assessment in a number of technical areas specifically covering issues raised during the review of any design notification. For other cases the need for specialist assessment of a topic is judged taking account of:

any material change or proposals for material change, to the installation or its management systems,

the reasons for directing a revision and the specialist area(s) involved.

A revised case [whether a material change or a directed revision] will only need assessment of the proposed revisions, and of other parts of the case affected by the revisions. The extent of assessment should be proportionate to the risks. In the case of a Regulation 14(2) revision, HSE’s acceptance decision relates solely to the proposed material change, and assessment must be confined to that change.

3) Key dates

The assessment key dates, as in Table 1 above, and

4) Communication with the duty holder

The communication arrangements between assessors, the DCM, and the duty holder.

Case manager:

3.21 Approve the brief in COIN and inform the DCM. If amendment is necessary (see paragraph 3.23) approve the revised brief and inform the DCM.

DCM:

3.22 Send the brief to all topic managers, relevant assessors and SCCs, and to the Safety Case Plan Co-ordinator. If amendment is necessary (see paragraph 3.23) re-issue
the brief and ensure any revised dates are reflected in the Safety Case plan. This may be
done electronically. The brief is issued by the 'assessment brief issued' date in Table 1. All
topic teams receive the brief, to ensure they are aware of the case. It is also used to update
the Safety Case plan.

**Topic manager (TM):**

3.23 If you wish to amend the brief, discuss the proposed changes with the DCM in the
first instance. If agreement cannot be reached, ask the relevant operations managers to
resolve the matter. Record any agreed changes on a case note, and ask the DCM to re-
issue the brief.

**Assessment**

**Assessors (including the DCM for the SMS topic):**

3.24 Use the assessment brief (with any agreed revisions) as the basis for your
assessment of the case, consulting other assessors as required. If you need to seek
clarification on any aspect of the Safety Case content contact the duty holder promptly.
Assess it using appropriate topic guidance to identify deficiencies to be addressed by
the duty holder and stay within the scope of the assessment brief. Alert your manager if any
possibility of significant delay becomes evident. If you have any concerns about the quality
of the case, such that a large number of Level 1 issue notes may be generated, discuss
with your manager whether to recommend return of the case to the duty holder, as in
paragraph 3.18 at the earliest.

**Deficiencies identified by assessment**

3.25 The priority of assessment is to identify any deficiencies which, if not resolved, will
result in the assessor considering that the case is inadequate with regard to the topic.
These are known as a Level 1 issue. Such deficiencies should be raised as level 1 issue
notes immediately that they are identified – see paragraphs 3.27-3.32. They can include
failure to provide straightforward but essential items, such as scale diagrams and
descriptions specifically required by SCR. Assessors should ensure that that the DCM is
informed of any Level 1 issues to raise when they are placed on COIN.

3.26 Any other deficiencies must be pursued promptly with the duty holder in writing
(using template 33) by the case management as and when they are identified. This is to
ensure that in exceptional circumstances where deficiencies remain unresolved such that
the case is considered inadequate, there is sufficient time to raise a level 1 issue note
and send it to the duty holder by the issues raised date.

See Annex 1 for an example Level 1 issue note

**Raising level 1 issues**

**Assessor:**
3.27 If you identify a deficiency that warrants a Level 1 issue note, draft an issue note and send to your manager immediately, without waiting for the completion of the topic assessment. If your TM does not agree that it is a Level 1 issue and your view changes, record the reasons for this on a case note.

**Topic manager:**

3.28 Review the draft Level 1 issue note. If you agree that it is justified inform your operations manager. If your operations manager agrees send the draft issue note to the CM. If you disagree with the assessor, and their view does not change, record the reasons on a case note and initiate the resolving differences of professional opinion process (see paragraph 1.22).

**Operations manager (topic team):**

3.29 If you disagree with the topic manager, but their view does not change, record the reasons for your views on a case note and initiate the resolving differences of professional opinion process (see paragraph 1.22). Your opinion becomes the authoritative HSE view.

**Topic manager:**

3.30 If it is agreed that a Level 1 issue note is justified, forward the draft issue note to the case manager without delay, in consultation with the assessor and the DCM. Use the Level 1 Issue note (template 4), taking note of the example issue note (Annex 1) and referring where appropriate to particular sections of APOSC [PDF 158KB] and of GASCET technical guidance. Send the note to the case manager.

The note identifies:

- a) Relevant legal requirements, where appropriate relevant parts of booklet L30, and relevant APOSC heading(s) and principle(s).
- b) The topic involved (for example a specific factual description, major accident hazard, risk analysis technique or management system aspect).
- c) The nature and extent of the deficiency, taking account of information already in the case.
- d) The nature and the extent of the response that is likely to be satisfactory.

**Case manager:**

3.31 Review the issue note for legal accuracy and to ensure it contains the above information. Any concerns should be referred to the topic manager and the Legal and Operational Strategy Team to resolve. Approve the note in COIN and inform your operations manager. Prepare a covering letter for the duty holder, using template 9.

**DCM:**

3.32 Send the issue note and the letter, immediately to the duty holder's senior business manager responsible for the particular installation(s), as well as to the normal duty holder case contact. Where practicable, send it early enough to allow the duty holder at least 14
calendar days to respond before the responses due date, or at least 7 days for material change cases relating to combined operations. Record the issue note and the letter on COIN as issue notes.

**Assessment case notes**

**Assessor:**

3.33 After raising any Level 1 issues, complete the assessment and prepare an assessment case note (template 5) to record them and document any involvement of other assessors. The note outlines the scope of the assessment with reference to the assessment brief.

**Topic manager:**

3.34 Review and approve the case note for relevance, quality and timeliness, and send it promptly to the DCM.

**SCCs:**

3.35 Monitor progress in the compilation of assessment cases notes and highlight any delays to the relevant staff.

**Monitoring responses**

**SCC:**

3.36 Monitor the progress of duty holder responses against agreed dates.

**DCM:**

3.37 Where the duty holder fails to respond, such that this may prevent completion of the assessment as planned, remind the duty holder using a ‘delayed response’ letter (template 10). Record the letter on COIN and inform the case manager and relevant operations managers, topic managers and assessors.

3.38 Review the duty holder’s reply to this letter and, with the agreement of the case manager, change the ‘required by’ end date of the relevant COIN service order lines including the ‘acceptance decision’ line. Amend the ‘topic close out’ and ‘case completion’ dates on the Safety Case plan. Write to the duty holder to advise them of the revised assessment completion date. Record the letter on COIN.

**Handling responses**

3.39 Level 1 issues may only be resolved after a written response from the duty holder, which should include any further information requested and any remedial actions that the duty holder has confirmed will be implemented prior to operation of the installation. Such actions should describe specific improvements to hardware or management systems. Proposals for reviews, studies, risk assessments etc are not acceptable by themselves, as
their outcome is unknown. Discussion with the duty holder may be needed to clarify the response and/or explain any shortcomings and to seek changes to make it acceptable.

**DCM:**

3.40 Distribute responses to the relevant assessors. Use case notes to record any discussions held with the duty holder and any agreements reached.

**Progress monitoring**

**Case manager:**

3.41 Monitor assessment progress with regard to the key dates and to the number and type of Level 1 issues being raised. Carry out a formal stocktake at the relevant date on the Safety Case plan, involving topic managers as appropriate, and record the result on a case note. The stocktake should review progress against the Safety Case plan and responses from the duty holder. An earlier technical review with relevant topic teams may be needed if there are concerns over the quality of the Safety Case, to the extent that further assessment may require excessive resources. If this is the case, consider returning the case – see paragraph 3.18.

**Operations managers:**

3.42 Initiate any action necessary to expedite completion of the assessment by the due date.

**Closing deficiencies raised in level 1 issue notes**

**Topic assessor:**

3.43 You should consider the response from the duty holder and advise your topic manager of your opinion of the adequacy of the response by an entry in the assessment completion report (template 7).

**Topic manager:**

3.44 You should consider the response from the duty holder, and the opinion of the assessor and decide if the response is adequate. If you agree with the opinion of the assessor you should approve the assessment completion report. If you disagree with the assessor, and agreement cannot be reached, you should follow the process in paragraph 1.22. Inform the DCM and case manager by case note of your operations manager’s decision.

**Topic operations manager:**

3.45 If you disagree with the topic manager, but their view does not change record the reasons for your view on a case note and initiate the difference of professional view process in paragraph 1.22. Your opinion is the authoritative HSE view.
Case manager:

3.46 Where the response to a Level 1 issue note is not satisfactory, send a follow-up letter (template 11) without delay to the duty holder's senior business manager responsible for the installation(s), as well as to the normal duty holder contact. Record the letter as a Level 1 issue note. This letter should explain why the response is unsatisfactory, with appropriate reference to SCR, booklet L30, APOSC [PDF 158KB] and GASCET [PDF 2.15MB]. It should describe the nature and extent of the response needed to resolve the issues(s). Every effort should be made to obtain the required information before the planned acceptance date.

DCM:

3.47 Distribute any further responses from the duty holder to the relevant assessors to establish if they are now satisfactory.

Case manager:

3.48 If it appears that an acceptable response to a Level 1 issue note may not be received before the end of the assessment period consult your operations manager.

Operations manager:

3.49 If the view is that acceptance appears unlikely arrange a meeting with the duty holder to try and resolve outstanding issues, and brief the Head of Division. The OM and CM should consider whether to extend the assessment period.

3.50 Having done this if the view is that acceptance appears unlikely, the OM should write to the duty holder's senior manager saying that HSE does not believe it can accept the case (templates 14 and 15). Copy the letter to the normal duty holder contact. Also send an explanatory note to the Head of Division, and to the Legal Advisor's office for information. This should be a balanced, objective summary of the situation and of the likely legal implications. The timing of this letter will depend on the circumstances, but typically should coincide with the topic assessment completion date in Table 1. For Regulation 7 and 8 cases the letter should be sent at least 7 calendar days before the acceptance decision date in the Safety Case plan.

Case manager:

3.51 Consider whether to extend the assessment period (by agreement with the duty holder), until the outstanding issues are resolved or the duty holder is unwilling to continue. Change the ‘required by’ date on the COIN service order to reflect this delay. The recommendation on whether to accept is held in abeyance meantime. Any extension must take account of the legal position, for example by delaying the start of operations on an installation submitted under Regulation 7, or any implementation of a change for a case under Regulation 14. At the end of the assessment period any outstanding issue note(s) are closed as in paragraph 3.46 onwards,
Assessment completion reports

Assessor:

3.52 Record your assessment using the assessment completion report (template 7) in time for it to be approved by the TM and delivered to the DCM by the ‘topic assessment completion’ date on the Safety Case plan.

The report records:

a) the scope of the assessment, with reference to the assessment brief and the assessment case note(s),

b) a summary of the assessment undertaken by the assessor and, in cases of disagreement, the topic manager's views on the adequacy of the responses. If satisfactory amendments to the case have been received, these are referenced,

c) the basis for the conclusions relating to the issue in each Level 1 issue note, making appropriate reference to SCR and guidance, relevant statutory provisions and approved codes of practice (ACoPs), GASCET, APOSC and other relevant recognised industry standards and guidance. If an issue is unresolved each deficiency in the duty holder's response is recorded, with suitable justification.

d) conclusions on the adequacy of the case as a whole in respect of the topic area and, where the operations manager is in disagreement with the topic manager, the HSE authoritative view.

Topic manager:

3.53 Approve the assessment report in COIN. Ensure that the relevant topic assessment record is completed, approved, and filed on COIN.

Case close out

Case manager and DCM:

3.54 At the end of the assessment period, consider whether the acceptance criteria are satisfied. Taking account of:

a) the original case as submitted,

b) any additional material supplied by the duty holder, and

c) the views of assessors in their assessment completion reports.

Case manager:

3.55 Decide whether to recommend acceptance (or for directed revisions, suspension) of the case to the operations manager. Issue notes should be closed in accordance with the guidance in paragraphs 3.43-3.51. Where the issue involves a disagreement between inspectors, the difference of professional opinion procedure in Section 1 paragraph 1.22

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should be followed. Where there has been a difference of view then the HSE authoritative view should be used for the acceptance recommendation.

**DCM:**

3.56 Compile a case closeout report (template 6).

The report includes:

a) The outcome of the DCM review,
b) any changes to the assessment brief or to the assessment team,
c) a summary of the issues raised and how they were closed,
d) any satisfactory amendments to the case supplied by the duty holder,
e) the case manager’s recommendation on acceptance of the case and the reasons for it based on the acceptance criteria,
f) a summary of any use of the differences of professional view procedure – see Section 1 paragraph 1.22, and
g) the progress stock take date.

**Case manager:**

3.57 Approve the closeout report case note in COIN, and send it to your operations manager.

**Acceptance/rejection decision**

**Operations manager:**

3.58 Review the closeout report, consider if assessment issues have been appropriately handled, and make the acceptance/rejection decision. If you decide against the recommendation of the case manager to accept or reject the case record the decision and the reasons for it on a case note to the topic manager, their operations manager and the Head of Division. If there is a difference of opinion between the IMT and a Topic Team then the Formal Second Opinion (FSO) process referred to in Section 1 paragraph 1.22 must be implemented.

3.59 For an accepted case inform the duty holder by letter (template 12). For a case that is not accepted, brief the Head of Division and consider if the formal second opinion process should be initiated to review the decision, before writing to the duty holder. Guidance on the process is provided in L30 paragraph 240 and this should be followed. There is no template for the letter, as it should be tailored to the situation. It should include:

a) description of the unresolved issue(s) and why the duty holder's response is inadequate,
b) the consequences of the decision with respect to SCR,
c) an offer of a meeting with the Head of Division to discuss the position,
d) references to OSD’s review procedures (see Section 8) and to the appeal procedure, with a copy of each, and

e) reference to the letter to the safety representatives. There is no template for this letter and it should be tailored to the situation.

Case manager:

3.60 Write to the installation safety representatives regarding the outcome of assessment using template 13 for an accepted Safety Case or drafting an appropriate letter for a case that is not accepted.

3.61 There may be rare instances where it appears to the operations manager that the Safety Case could be accepted, but there are serious discrepancies between the standards described in the case and those currently achieved on the installation. Compliance with SCR Regulation 16(1) regarding the duty to follow the procedures and arrangements in the Safety Case, may not be achieved, such that acceptance may be virtually simultaneous with the issue of an enforcement notice. The case should be accepted and any non-compliance with the case should be followed up by inspection and, where appropriate, enforcement. An alternative to immediate acceptance is to write to the duty holder describing the situation and giving them the opportunity to nominate a later date for acceptance and implementation of the Safety Case, to give time for remedial actions to be carried out.

Final closeout

Case manager:

3.62 Ensure that COIN records for the case are complete and that any amendments to the Safety Case received during assessment, and any other documents not held on COIN, are held in registered files.

SCC:

3.63 Notify the assessors and topic managers when the close out report has been placed on COIN, and request that all COIN records are set to the appropriate status. File correspondence to be retained (and which cannot be input to COIN) in a suitable registered file.

DCM:

3.64 For dismantlement cases, inform OSD4 and the relevant FOD office of any project where significant amounts of onshore dismantling may occur.

Safety case assessment and intervention planning

3.65 OSD’s Intervention Plans will take account of information contained in the Safety Case and obtained during the assessment process. This information will be considered
during the compilation of the Intervention plan as described in the Offshore Intervention Guide.
### Annex 1 Example of a level 1 issue note

#### LEVEL 1 ISSUE NOTE

**COIN Case:** 1234567

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<thead>
<tr>
<th>Issue Note Title:</th>
<th>Edzell Riser Risk Assessment</th>
</tr>
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<tbody>
<tr>
<td>Issue Note reference number:</td>
<td>Insert consecutive numbers</td>
</tr>
<tr>
<td></td>
<td>1</td>
</tr>
</tbody>
</table>
| Duty holder name and address | Big Oil plc  
1 Union Plaza  
Aberdeen |
| Safety Case Title: | Lunan Alpha Reg 14(2) riser modifications |

#### Nature of Issue:

**a. Relevant Legal Requirements**

**Offshore Installations (Safety Case) Regulations 2005**

Regulation 12(1)(d) in particular demonstrating evaluation of all major accident risks and the taking of measures to reduce risks so as to ensure compliance with the relevant statutory provisions, in this case the Health and Safety at Work, etc Act 1974 and the Offshore Installations (Prevention of Fire & Explosion, and Emergency Response) Regulations 1995 (PFEER): Schedule 2 paragraph 12, in particular the description of the measures and arrangements to protect persons from fire, heat, smoke, etc.

**b. Relevant Part(s) of Guidance Document L30, where appropriate:**

Paragraphs 176-184 re management of health and safety.

**c. Relevant APOSC heading(s) and principle(s)**

Principle 5 major hazard risk reduction.

**d. Topic involved [for example a specific factual description, major accident hazard, risk analysis technique or aspect of the management system]:**

The hazards associated with a gas release from the riser connected to the Edzell reservoir.

**e. Nature and extent of deficiency [taking account of information already in the Safety Case]**

The case describes modifications to the installation to allow Edzell reservoir fluids to be processed in separation train A, including connection of an existing riser to a new subsea gas flowline from Edzell. The riser passes within 5m of the underside of the temporary refuge [TR]. The ESDV is located directly under the TR, which has passive fire protection on its underside and shielding to protect the lifeboats from riser fires.

The case describes the quantified risk assessment carried out for the modifications, which indicates that the risk to the TR is significantly increased. However there is no information to show that alternatives, which might reduce the risk, have been considered or to demonstrate that such alternatives are not reasonably practicable. The revised risk figure for the TR is high and hence greater rigour is required in the supporting arguments to demonstrate that it is not reasonably practicable to reduce it further.

Possible examples of mans to reduce risk are:

i. Installation of a new riser further away from the TR instead of using the existing riser.

ii. Relocation of the ESDV on the existing riser to reduce the effect of flange fires on the TR.

iii. Installation of a subsea isolation valve on the Edzell flowline to limit gas release on Lunan.

iv. Relocation of one or more lifeboats further away from the Edzell ESDV.
Therefore, the case does not contain sufficient particulars to demonstrate that appropriate measures have been taken to ensure compliance with the relevant statutory provisions and in particular PFEER, Regulations 5 and 9.

**Action Required:**

*a. Nature of the response required, referred to relevant guidance:*

A demonstration by reference to alternative means of risk reduction that measures have been taken to ensure compliance with the relevant statutory provisions regarding a gas release from the Edzell riser.

*b. Extent of the response required:*

The existing demonstration should be extended to identify and assess possible alternatives to the current Edzell riser configuration, aimed at reducing risks to persons from a gas release. It should show that the costs of such alternatives are in gross disproportion to the risk reduction achieved. Additional guidance on TR functions and endurance criteria is in "Assessment principles for offshore safety cases" [APOS].
Assessment Process

1. Receipt of safety case
   - SCC distributes safety case
   - DCM undertakes initial review

2. Is initial review ok?
   - YES
     - DCM advises CM that case appears to be deficient
     - CM consults TA, OM and DCM
     - Case to be returned to duty holder
   - NO
     - CM informs OM and DH and returns the case

3. TM agrees assessment brief?
   - YES
     - TA drafts IN and discusses issue with TM
     - Are any level 1 issues identified?
     - YES
       - TA completed Topic Assessor’s Assessment Completion Report
       - CD/DCM make recommendation on acceptance/rejection to OM
     - NO
       - TM sends draft L1 IN to CM/DCM
       - CM approves and DCM distributes assessment brief
       - TM agrees assessment brief
       - TA assesses case
       - Is it a level 1 issue?
       - YES
         - CM agrees assessment brief
         - CM approves and DCM distributes assessment brief
         - DCM prepares Assessment brief
       - NO
         - CM informs OM and DH and returns the case

4. DCM sends letter and IN to DH
   - DCM sends DH response to TA
   - Do TA/TM agree as to the adequacy of response?
     - YES
       - TM submits CM/DCM
       - DCM informs DH that response is inadequate and forwards any further response to TA
     - NO

5. Is case to be returned to duty holder?
   - YES
     - CM briefs HoD
     - OM commissions FSO and briefs HoD
   - NO
     - OM accepts SC and writes to DH
     - CM writes to Safety Rep s
     - Case closed on COM and files updated
     - Assessment completed
Resolving Differences of Professional View

Disagreement of Professional view cannot be resolved

CM/TM* holds a meeting to try and resolve issues

CM/TM* records summary of meeting and outcome on a case note

Is agreement reached?

Record decision on a case note

Continue assessment

A

Refer issue to relevant OM

OM holds further meeting seeking to resolve issue

Has issue been resolved?

Yes

OM decides on the authoritative HSE view and records decision on a case note

No

OM Consults with another OM not involved in the decision

If necessary the OM for the acceptance decision uses the FSO procedure

CM/TM* asks DCM/TA* to record their views on a case note

* As appropriate
Introduction

5.1 This procedure describes how HSE deals with design and relocation notifications submitted under the Offshore Installations (Safety Case) Regulations 2005 (SCR). TRIM folder 1.9.3.692. contains standard forms and letters that should always be used. Table 1 lists the responsibilities of those involved, and the relevant timescales.

5.2 Regulation 6 requires operators of new production installations, and operators of production installations that are to be moved to new locations, to prepare and submit a notification to HSE. This should contain the particulars in Schedule 1. Likewise, Regulation 9 requires owners of a non-production installation due to be converted to a production installation, to submit a design notification containing the particulars in Schedule 1 not already in the current Safety Case.

5.3 HSE’s objectives for notifications are:

1) to send comments to the duty holder that will enable them to take account in the design of any issues raised,
2) to identify any issues that might prevent HSE from accepting the Safety Case submitted under Regulation 7, or revisions submitted under Regulation 9(5) or 14(3)(c),
3) to identify whether there are any other health and safety issues that need to be pursued with the operator, and
4) to prepare an intervention plan.

5.4 A design notification is only part of the design and construction process. HSE is involved in a number of stages, as described in the design intervention section of the Offshore Intervention Guide and in Offshore Information Sheet 11/2007.

5.5 Notifications are not accepted by HSE. They provide HSE with an opportunity to raise health and safety issues before detailed design work has been carried out. A notification has to be submitted early enough to allow the duty holder to take account of issues raised by HSE within 3 months of submission. Such issues may include those that could create difficulties in the assessment or acceptance of the Safety Case, or of revisions to it. It may diminish HSE’s ability to object subsequently to aspects of a Safety Case if HSE does not raise issues at the notification stage that have been fairly presented to HSE. Care must be taken to avoid raising questions over an extended
period when inspecting the notification, it is not HSE’s role to design the installation for
the duty holder.

5.6 The operator may decide to make a material change to the particulars notified,
between submission of the notification and submission of the Safety Case, or of any
revision to it. Regulation 6(4) requires a further notification of that change, which HSE
may also wish to consider.

5.7 Notifications provide an opportunity to consider wider health and safety issues,
not just those relating to major accident hazards but including compliance with other
statutory provisions. Such issues should be discussed with duty holders, differentiating
clearly between major hazard issues which could affect eventual acceptance, and
others.

Management of the notification review

5.8 The appropriate inspection management IMT inspector will manage HSE’s
review of the notification.

Procedure

Safety case co-ordinator (SCC):

5.9 On receipt of a design or relocation notification, identify the relevant inspection
management team (IMT) inspector and Safety Case Co-ordinator (SCC), and send or
email them the notification. If an IMT inspector cannot be identified, consult an
operations manager. Create a COIN case and service order. Operations Notice 74
gives guidance to duty holders on submitting notifications. The SCC should ensure that
the dedicated email account for SCR submissions is monitored at least daily.

5.10 Send an acknowledgment letter to the operator on behalf of the IMT (template
16). Identify the topic inspectors to consider the notification, allocate the relevant service
order lines and send them the notification. The inspectors involved will normally be
those who would assess a Safety Case from that operator.

IMT inspector:

5.11 Screen the notification to ensure it has potential to meet the SCR requirements,
bearing in mind the provisions of Regulation 6(3). If the information is deficient, advise
the operator accordingly, with the agreement of your team leader.

5.12 Use template 17 to ask the topic specialists to inspect the notification and
respond by the due date. Hold a meeting with the specialists to identify any significant
issues. Include such issues in a letter to the duty holder (template 18). Alternatively
delegate follow-up of appropriate issues to a particular specialist. The operator may be
invited to make a presentation at this meeting.

Topic teams:

5.13 Inspect the notification, referring to technical guidance as appropriate. Advise the
IMT inspector, at the meeting or by use of template 19, of any questions or requests for
information that need to be put to the duty holder. **Assessment Principles For Offshore Safety Cases** (APOSOC) contains assessment principles for Safety Case assessment that are also relevant to notifications. **Guidance for the Assessment of the Major Accident Hazard Aspects of safety cases** (GASCET) contains detailed technical guidance for inspectors.

5.14 Consider any replies, interacting further with the duty holder and the IMT as required, until the issues are resolved. However, within 12 weeks of the initial receipt of the notification by HSE, prepare a report (template 20) identifying:

1) any remaining significant issues that might prevent acceptance of the Safety Case, or of revisions to it,
2) any other health and safety issues that need to be pursued with the duty holder, and
3) any further information that is required from the duty holder.

**IMT inspector:**

5.15 If necessary, hold a meeting with topic teams to agree specific responses or interventions. Then prepare a closeout report, containing HSE’s views of the design notification and a statement of whether there are any issues which could prevent acceptance of the Safety Case, or of any revisions to it (template 21). List any prioritised inspection matters in the report. Prepare a letter to advise the duty holder of HSE’s views using template 22. The letter should highlight significant issues that may prevent acceptance of the case, or may make assessment difficult. For issues which may prevent Safety Case acceptance, the letter should be sent within 3 months of the submission of the notification.

**IMT team leader:**

5.16 Sign and send the letter prepared by the IMT inspector.

**Further activities**

**IMT inspector:**

5.17 Maintain contact with the duty holder to ensure that the issues in the letter are effectively addressed. For issues which may affect acceptance it may be appropriate to meet with the operator and/or write further to emphasise the need to resolve the issues. Any unresolved issues at the end of the design notification inspection should be recorded using template 30 and referenced in the intervention plan for the installation. The template should be attached to the COIN case for the intervention plan. Further activities are recorded against this case.
Table 1 Responsibilities and dates

<table>
<thead>
<tr>
<th>Procedure reference</th>
<th>Action</th>
<th>Person responsible</th>
<th>Time action is required after receipt of notification</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1</td>
<td>Identify IMT inspector, create Case/Service Order</td>
<td>SCC</td>
<td>1 day</td>
</tr>
<tr>
<td>4.2</td>
<td>Acknowledge receipt, identify specialists, distribute notification, populate Service Order</td>
<td>SCC</td>
<td>2 days</td>
</tr>
<tr>
<td>4.3</td>
<td>Screen notification</td>
<td>IMT inspector</td>
<td>15 days</td>
</tr>
<tr>
<td>4.4</td>
<td>Issue brief</td>
<td>IMT inspector</td>
<td>15 days</td>
</tr>
<tr>
<td>4.5</td>
<td>Hold initial meeting, identify significant issues</td>
<td>IMT and topic inspectors</td>
<td>40 days</td>
</tr>
<tr>
<td>4.6</td>
<td>Advise IMT of any issues arising or requests for information</td>
<td>Topic inspectors</td>
<td>40 days</td>
</tr>
<tr>
<td>4.7</td>
<td>Send questions / initial views to duty holder</td>
<td>IMT inspector</td>
<td>40 days</td>
</tr>
<tr>
<td>4.8</td>
<td>Distribute replies</td>
<td>SCC/IMT inspector</td>
<td>59 days</td>
</tr>
<tr>
<td>4.9</td>
<td>Prepare reports</td>
<td>Topic inspectors (IMT for SMS)</td>
<td>83 days</td>
</tr>
<tr>
<td>4.10</td>
<td>If appropriate, hold close-out meeting</td>
<td>IMT/topic inspectors</td>
<td>83 days</td>
</tr>
<tr>
<td>4.11</td>
<td>Prepare close-out report, update inspection plan</td>
<td>IMT inspector</td>
<td>90 days</td>
</tr>
<tr>
<td>4.12</td>
<td>Prepare and send letter to duty holder</td>
<td>IMT inspector operations manager</td>
<td>90 days</td>
</tr>
</tbody>
</table>
Introduction

6.1 HSE has three objectives when dealing with notifications under the Offshore Installations (Safety Case) Regulations 2005 (SCR), Regulation 10:

1) to check that the notification meets the requirements of SCR, particularly those in Regulation 10 and Schedule 4;
2) to confirm that the combined operations proposed are within the scope of the accepted Safety Case of each installation involved;
3) to decide if an inspection of the combined operation activity is required.

6.2 For most notifications, for example those involving a production installation and a drilling rig, there will be two focal point inspection management team (IMT) inspectors involved. The inspector for the duty holder of the production installation takes the lead in processing it. The work is chargeable for work recording purposes. TRIM folder 1.9.3.692 contains two standard templates for combined operations notifications that should always be used.

Requirements of the regulations

6.3 The definition of a combined operation in Regulation 2(4) determines whether a notification needs to be sent to HSE. Notification is intended to ensure that adequate consideration is given by the duty holders to reducing the risks from a major accident arising from the combined operations, and that there will be effective co-ordination of their management arrangements.

6.4 Regulation 10 requires notification at least 21 days [or such shorter period as HSE specifies] in advance of a combined operation. The notification has to contain the particulars in Schedule 4. Any of the duty holders involved may submit the notification.
6.5 Combined operations notifications are not required to be accepted by HSE. However, each duty holder must have an accepted Safety Case that covers the generic aspects of the combined operations. If the proposed operation exceeds the scope of the operations described in either Safety Case, the duty holder must submit a Safety Case revision under Regulation 14(2) detailing a material change that will bring the proposed operation within the scope of the case. When this is accepted by HSE, the notification can be submitted.

**Procedure**

**Safety case co-ordinator (SCC):**

6.6 On receipt of a notification, use the Safety Case plan to identify the IMT inspector to lead HSE’s response to it. If the inspector is unavailable, ask the team leader to nominate another inspector. Operations Notice 74 gives guidance to duty holders on submitting notifications. The SCC should ensure that the dedicated email account for SCR submissions is monitored at least daily. The appropriate inspector will normally be the focal point for the production installation associated with the combined operation.

6.7 Create a COIN case for the notification against the production installation. Send the notification to the lead inspector with a note of the COIN case number. If the notification is in electronic form, attach it to the COIN case. Advise the relevant IMT administrator that the notification has been received.

6.8 Send an email to the IMT focal point of the non-production installation(s) to advise that the notification has been received. Write to the duty holder who submitted the notification to acknowledge receipt, using template 23.

**Inspection management team leader:**

6.9 Where the focal point inspector is unavailable, ensure that the notification is assigned to an inspector who can deal with it promptly. On completion of work relating to the notification, ensure the COIN case is closed. The performance standard for closeout is 4 weeks from receipt of the notification.

**IMT focal point inspector (production installation):**

6.10 Review the notification with the non-production installation inspector(s) to:

1) check that it is within scope of the duty holders’ Safety Cases,
2) ensure it meets the requirements of Schedule 4,
3) identify any significant concerns, unusual operations or novel risk reduction measures, and
4) decide and plan any appropriate onshore or offshore inspection.

6.11 Consider also whether to inspect the combined operation to ensure that the duty holders are complying with SCR. This would be a normal compliance inspection offshore involving appropriate topic teams. If you identify any non-compliance with the information requirements of Schedule 4, contact the duty holder to ask them to send any further information required.
6.12 If you identify any:

- significant health and safety concerns,
- unusual operations,
- novel risk reduction measures, or
- operations that lead to increased risks,

undertake an inspection, involving topic teams as appropriate. A timely intervention, onshore or offshore should be planned depending on the nature or urgency of the concerns. Inspection should be considered in its broadest sense. It can include all phases of the activity, including planning, preparation, approach, the operational activity, and move off.

6.13 Complete an inspection report using template 24 to confirm that:

1) the notification is within scope of the Safety Cases;
2) the notification meets the requirements of Schedule 4, and
3) relevant topic teams have been notified and the outcome of any discussion on whether to inspect has been recorded.

6.14 Ensure that any inspection activity results in reports, letters or notices that are a sufficient audit trail of HSE’s intervention, and are recorded and attached to the appropriate COIN case. The COIN case to which documents are attached may vary depending on the type of intervention. Documents associated with inspection of the notification are attached to the notification case. As a minimum, this will be the acknowledgement letter and the inspection report. Any correspondence or other documents generated from the inspection are also attached. The notification case can then be closed out.

6.15 Documents associated with onshore or offshore inspection of the combined operation activity are attached to the COIN case for the installation in question.
**IMT focal point inspector (non-production installation):**

6.16 Review the notification with the IMT focal point inspector for the production installation to:

1) check that it is within scope of the duty holders’ Safety Cases,
2) ensure it meets the requirements of Schedule 4,
3) identify any significant concerns, unusual operations or novel risk reduction measures, and
4) decide and plan any appropriate onshore or offshore inspection.

**Topic inspector:**

6.17 Consider if an inspection is required, in consultation with the IMT focal point inspector for the production installation. Record any inspection time in COIN and produce an inspection report following any intervention. Ensure that there is a sufficient audit trail, as above.
Section 7 Inspection of thorough reviews

Contents
Introduction
Purpose of a thorough review
Procedure
Stage (i): Inspection of the duty holder’s thorough review procedure
Stage (ii): Inspection of thorough review summaries for legal compliance and to inform future intervention plans
Annex 1 Inspection of the duty holder’s procedure

Introduction

7.1 The Safety Case Regulations require the duty holder to carry out a thorough review of a Safety Case at least once every 5 years, and to send HSE a summary of the review. HSE does not accept or approve the summary, but inspects it to check whether the Regulation 13 requirements have been fulfilled. HSE then uses the conclusions from the review and the inspection, along with other sources of intelligence to inform interventions.

Purpose of a thorough review

7.2 The purpose of a thorough review is to provide a duty holder check that the Safety Case [which exists for the lifetime of the installation] continues to be fundamentally sound. HSE’s inspection of the thorough review summary is not to confirm that the duty holder has made a case for safety for another 5 years. Nor is it to address HSE’s current inspection concerns, as these may distort the duty holder’s objectives in carrying out the review. Any such concerns should be dealt with by normal intervention methods.

Procedure

7.3 This procedure describes how compliance with the review requirement is regulated by HSE. It is in two stages:

   (i) Inspection of the duty holder’s procedures for carrying out thorough reviews, and
   (ii) Inspection of summaries for legal compliance and to inform intervention plans.

7.4 Stage (i) is carried out at intervals of at least once every 5 years. Stage (ii) is undertaken for each thorough review summary submitted to HSE.
7.5 Operations Notice 74 gives guidance to duty holders on submitting thorough review summaries. Proformas are used to acknowledge receipt of the summary (template 25), and for inspection reports (template 26). TRIM folder 1.9.3.692. contains
the standard templates which should always be used. Completed forms and letters are recorded on COIN. The Safety Case plan is used to keep track of summary due dates and progress.

7.6 All work with thorough reviews is chargeable inspection. The performance standard is for all work with respect to the adequacy of the review to be completed within 12 weeks of receipt of the summary.

7.7 While carrying out a review, a duty holder may conclude that a Safety Case revision is required. If this constitutes a material change, the revised case is submitted under Regulation 14(2) and assessed in the normal manner.

7.8 Alternatively, a review may result in Safety Case revisions that are not material changes and do not require assessment. The revised case may however contain information that would affect HSE’s intervention plans. Inspection management teams (IMTs) should consider if they need to see the revised case.

**Stage (i): Inspection of the duty holder’s thorough review procedure**

7.9 The objectives are:

a) to ensure that the duty holder has a good understanding of what is required, and

b) to ensure that the duty holder has an adequate process for undertaking a thorough review of their Safety Cases.

7.10 This stage is carried out typically 12 months before the first thorough review is received from the duty holder. It is repeated at least every 5 years, or as required, to ensure that the procedure remains consistent with current guidance and with any changes in the duty holder’s management arrangements.

**IMT inspector:**

7.11 Obtain a copy of the duty holder’s thorough review procedure and inspect it using the guidance in Annex 1, booklet L30 paragraphs 187-195, and in Offshore Information Sheet 4/2006. Check in particular that full account has been taken of legal requirements, and that all relevant major hazards and technical topics are covered.
7.12 Consult appropriate topic teams as required for a view on whether, for their particular topic, the procedure indicates that the duty holder has a good understanding of what is needed, and has an adequate process for undertaking thorough reviews.

7.13 Visit the duty holder to discuss the findings and agree any improvements required. Confirm by letter any significant deficiencies in the duty holder’s arrangements for undertaking a review.

7.14 Complete a report of the inspection and of any topics raised, using template 26, and attach the report, the procedure and any letter to an appropriate duty holder COIN case.

**Topic teams:**

7.15 If consulted by an IMT over a duty holder’s procedure consider whether, for the particular topic, it indicates that the duty holder has a good understanding of what is required, and has an adequate process for undertaking thorough reviews. Respond via email to the IMT inspector with any matters within the timescale requested.

**Inspection team leader:**

7.16 Approve the COIN record.

**Stage (ii): Inspection of thorough review summaries for legal compliance and to inform future intervention plans**

7.17 The objectives are to:

   a) check that each summary complies with legal requirements and shows evidence of an adequate thorough review, and
   b) use the summary to inform future intervention plans.

**Safety case co-ordinator (SCC):**

7.18 On receipt of a thorough review summary, identify the relevant IMT inspector, and send or email them the summary. Create a COIN case. [Operations Notice 74](#) gives guidance to duty holders on submitting summaries. The SCC should ensure that the dedicated email account for SCR submissions is monitored at least daily.

7.19 Send an acknowledgment letter to the duty holder on behalf of the IMT (template 25).
IMT inspector:

7.21 Ask all relevant topic teams to inspect the summary. Include the COIN number for the relevant inspection case for the installation.

7.22 Inspect the summary. Consider if the review has been sufficiently thorough.

7.23 The depth of inspection should be informed by the results of previous inspections of the duty holder’s procedure, sample implementation plans and summaries. As a minimum, the summary should contain the relevant information in paragraphs 193 and 194 of booklet L30, and confirmation of safety representative consultation.

7.24 If there is insufficient evidence that a thorough review has been completed, discuss the deficiencies with the duty holder and try to resolve them. Where the review is clearly inadequate, or the duty holder has not addressed the deficiencies raised with them, consider if a direction under Regulation 13(1) or if an improvement notice to comply with Regulation 13(2) is appropriate. See Section 8 for guidance on directing a review. If the remaining deficiencies do not merit directing a review or enforcement, then an inspection letter should be used to inform the duty holder of what further work is required to comply with Regulation 13(1).

7.25 Where the deficiencies are not significant these should be discussed with the duty holder and an inspection letter is to be sent to tell them what further work is required to comply with Regulation 13(1).

Topic inspector:

7.26 Inspect the summary and identify any topics for future intervention. Advise the IMT accordingly using part A of template 28, identifying any matters relating to potential non-compliance with major hazard legislation. This is done within ten weeks of receipt of the summary.

IMT inspector:

7.27 Collate any matters and update the intervention plan accordingly. Less urgent matters can await discussion at the next annual planning event.

7.28 Matters for intervention may include checking that any recommendations from the review, such as hardware or management changes, or updates to the Safety Case, have been implemented. Where the duty holder has a number of small installations, intervention plans may be updated as a group.

7.29 Complete a report of the inspection using template 29 and attach it to the appropriate COIN case. This is to be done within twelve weeks of receipt of the summary.

Failure to submit a thorough review summary

7.30 If a duty holder fails to submit a thorough review summary to HSE the IMT inspector should make enquiries as to the reasons why. In addition to a directed review,
an improvement notice focussed on the duty holder’s management system may be appropriate
Annex 1

Safety Case Thorough Reviews

Inspection of the duty holder's procedure

Policy

Are there overarching arrangements for implementation and review of the procedure?

Is a particular manager assigned responsibility for the review?

Is the scope and frequency specified?

Is the need for an element of independence recognised?

Is there a commitment to provide the necessary resources?

General

Is the procedure formally adopted, with appropriate file and version numbers?

Does it have clear objectives?

Does it take account of Offshore Information Sheet 4/2006?

How is an element of independence achieved?

How are resources and time-scales selected?

Inputs

What categories of personnel are used to carry out the review, and what qualifications and experiences are required?

How is objectivity achieved?

Are production, non-production and contractors represented?

Are safety representatives involved, both individually and as a group?

Changes

Is there a systematic process for review of changes:

- on the installation, including life-cycle aspects?
• In its management? and
• In the outside world (legal, technical, economic, aspirational)?

**Topic reviews**

Are the following covered by reviews?

- Key internal documents.
- Factual information on the installation and its location.
- Management systems.
- Human factors.
- Operational activities.
- Regulatory interventions.
- Generic and specific operational experience.
- Incident history.
- All relevant major hazards/safety engineering topic areas including risk control measures, safety critical elements, specified plant and associated performance standards.
- Current knowledge, including recent research.
- New legislation.
- Published guidance, including revisions.
- ALARP justification.

**Outputs**

How are outputs reviewed and priorities decided?

Are formal conclusions generated, and time-scales allocated for remedial work?

Is there a tracking system for actions?

Is there a means of revising the safety case as a result of the review?

How is the Safety Case's continued fitness for purpose assessed?

Is there a description of what a review summary should contain?

Is the review signed off by a senior manager?
Introduction

8.1 This section describes the criteria for deciding when it is appropriate to direct a thorough review or a revision of a Safety Case, or to suspend a case. It describes the procedures to be followed. It should be read in conjunction with Booklet L30.

8.2 The Offshore Installations (Safety Case) Regulations 2005 (SCR) give HSE power to:

- direct a thorough review of a Safety Case – Regulation 13(1),
- direct a revision – Regulations 14(1)(b) and 15(1), and
- suspend a case – Regulation 15(5).

These are likely to be rare events, and only invoked if it is not possible to agree with the duty holder on actions to be taken to deal with the relevant issues. In all cases adequate records should be kept of the decision process, for reference in the event of an appeal by the duty holder.

Review versus revision

8.3 It is important to distinguish between a thorough review and a revision. Regulation 13(2) requires a thorough review within 5 years of acceptance of the current Safety Case, or of the previous review. The review considers what has changed on the installation, in its management, in technical standards, etc and if the case needs to be revised. Only a summary of the review needs to be sent to HSE, and there is no acceptance requirement for the review, or for the summary.
8.4 Regulation 14(1)(a) requires a revision ‘when appropriate’. This could be for relatively minor matters, or for more significant ones which are material changes. For the latter the case must be submitted to HSE and accepted for the changes to be effective. If such revisions are carried out properly there will be less to update at the 5 yearly thorough review.

8.5 The outcome of a thorough review may be that the case needs to be revised. If this involves a material change, the revision must be sent to HSE and accepted before it comes into effect.

**Direction to carry out a thorough review**

8.6 HSE may direct a duty holder to review a Safety Case at any time. The following criteria should be satisfied:

1) the case is out-of-date, such that it does not contain the information required by the Regulations. For example, it may not adequately describe:
   - the layout, construction, management or operation of the installation,
   - the major accident hazards,
   - the risks posed by the major accident hazards, or
   - the precautions taken to mitigate those risks, and

2) it is not possible to determine what revisions are needed without a thorough review of the case, and

3) the duty holder does not intend to carry out a thorough review within a reasonable time.

8.7 Alternatively, a thorough review may be carried out, but HSE considers it to be inadequate. This view is based on the summary submitted under Regulation 13(3). The options then are to:

   - seek resolution of the deficiencies by discussion with the duty holder,
   - direct a further review, or
   - issue an improvement notice, for example alleging a breach of Regulation 13(2) if the 5 year review ‘window’ has passed.

8.8 If the deficiencies are significant and resolution by discussion is unsuccessful, direction of a further review may be more appropriate within the 5 year window, as there will not be a breach of Regulation 13(2) at that time. Otherwise an improvement notice may be the best way forward.

8.9 The Safety Case may be consistent with what is in place (offshore and onshore), but additional precautions may be reasonably practicable. In this case it may be more appropriate to use other legislation, such as the Health and Safety at Work, etc Act 1974 or the Offshore Installations (Prevention of Fire and Explosion, and Emergency Response) Regulations 1995 (PFEER), to secure improvements. Once they have been completed, the Safety Case should be revised as necessary and, in the case of a material change, resubmitted to HSE for acceptance.
Direction to carry out a revision

8.10 HSE may direct a duty holder to revise a current Safety Case under Regulation 15(1), which must then be submitted for acceptance. One of the following criteria should be satisfied:

a) HSE believes that changes to the installation or its management are a material change under Regulation 14(2), but the duty holder does not, or
b) HSE believes the current Safety Case is no longer satisfactory in some material aspect, but the duty holder is unwilling to review or revise it, or
c) the duty holder has reviewed the case (with or without HSE direction) and sees no need to revise parts of it for which HSE has identified revision requirements.

8.11 If the duty holder has not carried out a thorough review, HSE may first direct such a review. However, if HSE is clear in which matters the Safety Case is materially deficient, it may be more appropriate to direct a revision instead.

Direction procedure

Inspection team leader:

8.12 Where direction of a thorough review or of a revision appears appropriate, discuss this with the operations manager and relevant topic teams.

Operations manager (IMT):

8.13 If direction is agreed, consult the Head of Division and write to the duty holder using template 31 for a directed review, and template 32 for a directed revision.

8.14 A thorough review summary received after a direction is handled as in section 6. A directed revision is assessed using the procedure in section 3 as a ‘material change’ revision under Regulation 14(2). If serious concerns arise as to its adequacy level 1 issue notes are raised, and sent with the standard letter (template 9) modified to refer to suspension rather than to non-acceptance – see paragraph 8.18 below. The concerns may relate to the issue(s) precipitating HSE requesting the revision, or to new ones as a result of revisions to the case.

8.15 If it appears that the issues will not be resolved before the end of the assessment period, the operations manager sends a letter, similar to that described in section 3, paragraph 3.51 to alert the duty holder’s senior management to the possibility of suspension. The acceptance criteria in Section 1 are used to judge if the revision can be accepted or if suspension is appropriate. If the decision is to suspend, the operations manager briefs the Head of Division, before writing to the duty holder, as in section 3, paragraph 3.62.

Suspension – regulation 15(5)

8.16 HSE may suspend a current case where it does not accept a proposed revision. The installation must not be operated while the case is suspended. The deficiencies must therefore be significant, and every effort made to obtain a resolution by discussion.
8.17 Revisions submitted under Regulation 14(2) as a result of a material change identified by the duty holder, without HSE direction, cannot result in suspension if the revision is not accepted. The sanction in this case is that the change may not be put into effect, with whatever implications that may have on the operation of the installation.

8.18 Likewise an accepted case which HSE now considers deficient cannot simply be suspended. HSE must first direct a revision, or a review followed by a revision, thus giving the duty holder the opportunity to remedy the deficiency.

Appeals

8.19 The duty holder may appeal to the Secretary of State against a direction to revise a Safety Case or against a decision to suspend a case. The procedure for this is in SCR Schedule 8. Booklet L30 indicates (at paragraph 240) that the duty holder may first ask the Executive to review the direction decision – see Section 9.
Section 9 Review of decisions eligible for appeal

Contents
Introduction
Purpose of a review
Summary of features
Submission of an application for review
Conduct of the review
Amendment
Charging

Introduction

9.1 Under the Offshore Installations (Safety Case) Regulations 2005 (SCR), Regulation 24(1) any person who is aggrieved by a decision by HSE may appeal to the Secretary of State. The relevant decisions relate to:

- a finding of fact by HSE,
- non-acceptance of a Safety Case,
- direction to prepare a Safety Case revision,
- non-acceptance of a revision to a Safety Case,
- suspension of a Safety Case,
- not lifting a suspension,
- revocation of an exemption certificate, and
- grant of an exemption certificate with a condition or time limit.

These decisions do not include a direction of a review of a Safety Case.

9.2 The guidance in Booklet L30 indicates that all other means of resolving the matter should be fully explored with HSE, and that the duty holder can request a review of the decision by the Executive. This section describes the arrangements for carrying out such a review. It is written in terms of a decision not to accept a Safety Case, but it applies generally to all the decisions listed above. Where appropriate, it may also be a basis for an internal review of a decision to direct a review of a Safety Case.
Purpose of a review

9.3 A review is an internal HSE activity. The main purpose is to ensure that:

- the assessment was conducted fairly,
- the issues in contention were relevant,
- due account was taken of the facts and opinions presented, and
- OSD was entitled to reach the decision that it did.

It does not involve detailed peer review, nor an attempt to second-guess specialist opinion. The reviewer may have technical assistance and hear technical arguments; however, this is limited to understanding the issues involved, and to ensuring that OSD has taken full cognisance of the duty holder’s arguments and has reached a logical and consistent decision.

Summary of features

- It is a review by HSE’s Chief Executive, who can delegate all or part of the function to their deputy or to another senior manager. However, the conclusions letter to the duty holder is sent under the Chief Executive’s authority.
- The reviewer may ask a technical specialist [from outside OSD] to advise on interpretation of technical matters and, if necessary, someone from the Legal Advisor’s Office to advise on the law. A secretary may also be appointed.
- The reviewer considers written submissions from OSD, the duty holder and safety representatives. The reviewer may meet OSD and the duty holder, separately or together, to discuss their positions and see if there is any scope for common ground or for alternative solutions. Third parties are not involved unless the reviewer considers it beneficial.
- The review does not try to revisit complex technical issues. Rather, it focuses on whether the processes leading up to the decision were properly carried out, and OSD was entitled to take the view that it did. If procedures were materially misapplied, OSD will be directed to re-open the assessment.
- The Chief Executive gives a written judgement on the case, with the reasons for the views expressed. If finding in favour of the duty holder, the Chief Executive directs OSD to take appropriate action. The outcome is reported fully, so that all parties are aware of the scope and depth of the review.
Submission of an application for review

9.4 The duty holder applies in writing to the Chief Executive, within 3 weeks of receipt of the written decision or a subsequent meeting with the Head of OSD. The application includes:

- a summary of the reasons for seeking the review, and
- any supporting documentation submitted to OSD during the assessment process. This can include information or opinion from third parties.

Conduct of the review

9.5 The review is carried out by the Chief Executive, who may delegate all or part of the review to a senior manager outside of OSD. The reviewer may ask other staff, such as technical specialists from outside OSD, or a member of the Legal Advisor’s Office, to assist.

9.6 The reviewer informs the relevant safety representatives of the duty holder’s reasons for seeking a review, and invites them to submit comments by a specified date. Any such comments are not attributed to individuals. If there is no resident workforce or no safety representatives [for example if the installation is stacked or operating abroad], the reviewer may make other arrangements to hear views from those whose health and safety may be affected by the matters under review.

9.7 OSD provides the reviewer with a summary of the assessment process, including:

- the points of contention,
- the work done to try to resolve them,
- OSD’s current position, and
- any proposals for resolution.

The duty holder provides a similar view on the points of contention, their current position and any proposals for resolution. New issues or arguments should not be raised.

9.8 If the duty holder has any concerns over the way OSD has followed its assessment procedures, the reviewer asks OSD to comment. If the concern is justified, the Chief Executive may ask OSD to re-open the assessment and deal with the concerns.
9.9 The reviewer considers the submission, and any from the employee representatives, and seeks any clarification required. The reviewer may meet OSD and the duty holder, separately or together, to see if there is any scope for common ground or for alternative solutions. Third parties may be involved if the reviewer considers it beneficial; however it is not the reviewers function to arbitrate between, or to second-guess, complex technical issues.

9.10 The reviewer considers in particular:

- if the decision was taken in accordance with OSD’s procedures and associated guidance,
- if the issues giving rise to the decision related to matters of significance within the scope of SCR, and were clearly described to the duty holder,
- if the responses from the duty holder were given due consideration,
- if there are any obvious flaws in OSD’s reasoning in making the decision, and
- if there was any unfairness or bias in OSD’s assessment activity.

9.11 The Chief Executive gives a written view on the case, with reasons, to the parties involved. Where appropriate, the Chief Executive may direct OSD to take particular action [accept the case, lift the suspension, etc]. Where practicable, the judgement is provided within 6 weeks of receipt of the review application.

9.12 The review may find that the duty holder’s view has merit but there is no strong case for considering that OSD’s position is in error. It may then recommend further technical discussions take place, or simply indicate that there is insufficient reason to change the decision. This may be the case where there are strongly held opposing technical views.

Amendment

9.13 The Chief Executive may change any part of the procedure for a particular review. For any substantive change the Chief Executive will give the reasons for the change, and where appropriate will consult with the duty holder and OSD.

Charging

9.14 In the event of a review finding in favour of the duty holder, HSE will not normally charge for work related to the review.
Section 10 Performance standards

Introduction

This section describes the performance standards used by OSD to manage the processes described in this manual.

The performance standards are that the processes shall:

- be carried out in a competent and professional manner;
- be completed and recorded on time;
- be transparent to staff and to duty holders, and carried out to a consistent standard, with any necessary corrective actions taken promptly;
- contribute to OSD’s overall mission regarding the risks to personnel offshore; and
- be kept up-to-date and relevant to both HSE’s and duty holder’s needs.

These standards are supplemented by a set of performance objectives which detail the actions required to achieve each standard. Management at each level should monitor the performance of their staff against each objective, and take corrective action as appropriate.
Performance standards and objectives

Performance standard 1

Assessment and inspection shall be carried out in a competent and professional manner.

Performance objectives

1a) Staff will receive appropriate training in the use of SCHAM and COIN.

1b) Staff will comply with SCHAM and COIN procedures, and report any difficulties to the Legal and Operational Strategy Team.

1c) Inspectors will carry out assessment and inspection which is proportionate to the major accident risks involved and consistent between equivalent risks. Staff will use professional judgement in deciding on the breadth and depth of work required, guided by any relevant benchmarks.

1d) Inspectors will take account of legislation and guidance, including booklet L30, Assessment Principles For Offshore Safety Cases (APOSC), Guidance for the Assessment of the Major Accident Hazard Aspects of Safety Cases (GASCET) and other relevant internal and external technical guidance.

1e) Managers will monitor the performance of their staff in operating the Safety Case system, and take appropriate corrective action where necessary. The OSD divisional management team (DMT) will keep collective performance under review.

Performance standard 2

The processes shall be completed on time unless all parties agree. The DCM should record the reasons on a case note

Performance objective

2a) Staff will meet the time limits in SCHAM for activities under their control. Managers will ensure adequate resources are available, taking account of planned and unplanned availability.
Performance standard 3

The processes shall be transparent to HSE staff and to duty holders, and shall be carried out to a consistent standard, with any necessary corrective actions taken promptly.

Performance objectives

3a) The SCHAM document owner will ensure the current version of SCHAM is available to all users and to the public through HSE’s website.

3b) Inspection team leaders will ensure that the duty holder for any Safety Case, notification or thorough review summary which is not acceptable to HSE receives early warning of this view and has adequate opportunities for discussion aimed at resolving outstanding issues. Where a Safety Case is not accepted, the case manager will provide the duty holder with appropriate and timely information on appeal procedures.

3c) Managers will monitor the output of their staff to ensure the processes are carried out in a consistent manner which is appropriate to the risk.

3d) Managers will ensure their staff are aware of the difference of professional opinion procedure, and will facilitate use of the procedure as necessary.

3e) The DMT will ensure adequate arrangements are made for independent internal audit of SCHAM procedures, and will ensure audit recommendations are addressed promptly. Action plans for implementing audit findings are addressed promptly. Action plans for implementing audit findings will be in place within 30 days of receipt of the findings.

Performance standard 4

The processes shall contribute to OSD’s overall mission regarding the reduction of risks to personnel offshore.

Performance objectives

4a) Inspectors will take account of good practice in the industry and will encourage continuous improvement in standards relating to major accident hazards.

4b) Inspectors will seek the resolution of any generic matters identified in assessment or inspection, by appropriate internal and external discussion, and will publicise the outcome within OSD and externally.

4c) Management and staff will carry out assessment and inspection as an integral part of OSD’s intervention process, particularly regarding the handling of new installations and of inspection topics.

Performance standard 5
The processes should be up to date and relevant to both HSE’s and duty holder’s needs.

**Performance objectives**

5a) The Safety Case system process owners will keep the system under review, and make proposals for revision as necessary. This will include amendment proposals received from system users and from other sources. Any major deficiencies will be reviewed and recommendations on action made within 60 days of identification.

5b) The DMT will keep the offshore permissioning regime under review, and ensure that the Safety Case system is updated to reflect changes to the regime.
Section 11 COIN Records

Introduction

11.1 This section describes the use of COIN to record Safety Case assessment. It does not give instruction on the use of COIN; this guidance is provided on the intranet.

11.2 COIN provides a means of storing and retrieving documents generated during assessment. It is supplemented by the Safety Case plan, which holds information on assessment timetabling and is updated weekly in TRIM folder 1.3.2.564. and is also available on the OSD Community website.

Text documents

11.3 Text documents [such as case notes and letters] should be linked to the notes page of the service order for the current task.

11.4 Case and issue notes should be prepared using the appropriate Word templates in TRIM folder 1.9.3.692., and linked to the service order line using the ‘Add Note’ command.

11.5 COIN can store internal and external electronic documents [eg letters from duty holders]. Supported formats are Word for Windows (.doc), Word for Mackintosh (.mcw), Works for Windows (.wps), Adobe (.pdf), Rich Text Format (.rtf), and Text (.txt). Faxes and emails can be transcribed into Word documents, using the appropriate template, and added to COIN.

Editing case and issue notes

11.6 Initially, case and issue notes can be edited or deleted by any COIN user.
11.7 Documents stored on COIN have no status allocated to them. It is the service order to which they are linked that has a status. When the service order status is changed to closed or complete, linked documents cannot be edited or deleted.

11.8 If a document is not ready for filing until after the service order is closed, it is recorded against the notes field for the case.

**COIN records**

11.9 There is one unique COIN case record for each Safety Case received, that records details of the submission and case management. Further submissions or revisions of a previously accepted case do not use any COIN reference number previously assigned. COIN cases should be linked (associated) to the original case.

**Case notes**

11.10 Case notes are internal records of Safety Case assessment activity. They provide an audit trail to help demonstrate compliance with OSD procedures.

**Issue notes**

11.11 Issues that may prevent acceptance if not resolved are recorded on COIN as Level 1 issue notes.

11.12 Letters to the duty holder relating to the assessment (other than receipt confirmation and acceptance decision letters) are recorded on COIN as issue notes.

11.13 Receipt confirmation and acceptance decision letters are recorded as level 4 issue notes.

**Closing out level 1 issue notes**

11.14 When closing an issue note, text may be added in the details field of the service order notes page. This may, for example, comment on a referenced duty holder response. Alternatively, another note may be created.
Document management

11.15 The principles for managing safety case documentation are:

- Documents are stored so that the versions on which the case acceptance decision was based are available at the most likely point of use. Where possible documents are stored on COIN.
- Copies of documents not held on registered files, or on COIN at ‘Closed – Completed’ status, are regarded as uncontrolled. They should not be used in exercising legal powers, but may be used to aid understanding.
- Operations managers are responsible for ensuring adequate registered filing systems are maintained and used. Staff should use these systems as instructed.

Electronic approval of documents on COIN

11.16 HID policy is that operational records to do with interactions with duty holders are kept on COIN. This policy has been developed to avoid the possibility of version confusion that would exist if successive versions of documents are kept in different places. Safety Case records are of a type that only need to be written and approved. It should normally only take a few days for documents to move from being written by the author to approved. As a principle, such documents should only be placed on COIN upon completion.

11.17 If the document is placed on COIN by the author then their name will be recorded. If a document is placed on COIN by someone other than the author then the document’s author should be clearly identifiable in the text. The process of approval then includes confirmation of authorship.

11.18 Management approval should be granted by use of the ‘completed’ box on the document attachment line. The ‘completed box’ needs to be ticked by the person giving management approval. This renders the document secure. It can no longer be removed by users with normal level of access to the system. This function should only be delegated to others who are also able to grant management approval.

11.19 An audit trail then exists containing the name of the author and the person who has granted management approval.
Definition of ‘Management Approval’

11.20 The granting of management approval is an indication that the relevant document has been judged as fit for purpose by HSE. It is thus a demonstration that HSE has taken responsibility for that document.

11.21 It is the responsibility of the person granting management approval to decide the extent of the consideration needed for any particular document. In some circumstances it may be appropriate to provide a degree of checking, moderation or even correction. In other circumstances it may be appropriate for the consideration to be cursory. It would normally be the line manager who provides the approval.

11.22 Authority to grant approval can be delegated, but such a delegation should be recorded.

11.23 Checking of documents may be desirable in some circumstances. In this case the requirement is for the checker to be competent, not necessarily more senior than the author. The record should be annotated to indicate that such checking has taken place.

Storage

11.24 Internal documents should be stored on COIN in Word format.

11.25 The master copy of the accepted Safety Case is held by the Safety Case Co-ordinator (SCC). It should include any amendments made during assessment. A working copy is retained by the case manager, who should ensure that its status meets the needs of the inspection management team. All other copies are regarded as uncontrolled. Inspectors should confirm, by discussion with the case manager or deputy case manager, that the information is current before use in inspection or enforcement. Account should be taken of any revisions made by the duty holder to comply with Regulation 14(1). Operations managers are responsible for the storage arrangements of uncontrolled copies.

11.26 Original copies of responses from the duty holder are filed in registered files in the case manager’s unit, in accordance with local systems.
## Acronyms and definitions

### Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
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<tbody>
<tr>
<td>ACoP</td>
<td>Approved Code of Practice</td>
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<tr>
<td>ALARP</td>
<td>As low as reasonably practicable</td>
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<td>APOSC</td>
<td>Assessment principles for offshore safety cases</td>
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<td>CM</td>
<td>Case manager</td>
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<tr>
<td>COIN</td>
<td>Corporate operational intelligence system</td>
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<tr>
<td>DCM</td>
<td>Deputy case manager</td>
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<tr>
<td>DH</td>
<td>Duty holder</td>
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<td>DMT</td>
<td>Divisional management team</td>
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<td>FOD</td>
<td>Field Operations Directorate</td>
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<tr>
<td>FSO</td>
<td>Formal second opinion</td>
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<tr>
<td>FSO OM</td>
<td>Formal second opinion operations manager</td>
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<tr>
<td>GASCET</td>
<td>Guidance for the topic assessment of the major accident hazard aspects of safety cases</td>
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<tr>
<td>HID</td>
<td>Hazardous Installations Directorate</td>
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<tr>
<td>HoD</td>
<td>Head of Division</td>
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<td>HSE</td>
<td>Health and Safety Executive</td>
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<td>HSW Act</td>
<td>Health and Safety at Work etc Act 1974</td>
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<td>IMT</td>
<td>Inspection Management Team</td>
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<tr>
<td>IN</td>
<td>Issue note</td>
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<tr>
<td>OM</td>
<td>Operations manager</td>
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<tr>
<td>OSD</td>
<td>Offshore Division</td>
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<tr>
<td>PFEER</td>
<td>Offshore Installations (Prevention of Fire &amp; Explosion, and Emergency Response) Regulations 1995</td>
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<tr>
<td><strong>QRA</strong></td>
<td>Quantified risk assessment</td>
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<tr>
<td><strong>SCASUG</strong></td>
<td>Safety Case Assessment System User Group</td>
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<tr>
<td><strong>SCC</strong></td>
<td>Safety Case Co-ordinator</td>
</tr>
<tr>
<td><strong>SCHAM</strong></td>
<td>Safety Case handling and assessment manual</td>
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<tr>
<td><strong>SCR</strong></td>
<td>Offshore Installations (Safety Case) Regulations 2005</td>
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<tr>
<td><strong>SMS</strong></td>
<td>Safety management system</td>
</tr>
<tr>
<td><strong>TAR</strong></td>
<td>Topic assessment record</td>
</tr>
<tr>
<td><strong>TM</strong></td>
<td>Topic manager</td>
</tr>
</tbody>
</table>

**Definitions**

Words in **bold** are defined terms, for use in safety case assessment only.

<p>| <strong>Acceptance</strong> | Written notification to the <strong>duty holder</strong> that HSE is satisfied with the case for safety following <strong>assessment</strong> of the Safety Case. |
| <strong>Acceptance criteria</strong> | A set of criteria in section 1 of SCHAM defining acceptability of a Safety Case. |
| <strong>Acceptance decision</strong> | The decision as whether a case may be accepted by HSE, on the recommendation of the case manager. It is based on the <strong>acceptance criteria</strong>. |
| <strong>Acceptance recommendation</strong> | The recommendation made by the case manager to their operations manager regarding the acceptability of a Safety Case. It is based on consideration of the <strong>assessment completion reports</strong> from assessors and of the <strong>acceptance criteria</strong>. |
| <strong>Appeal</strong> | The statutory procedure whereby a person can appeal to the Secretary of State against a decision by the Executive regarding aspects of the regulations. |
| <strong>Assessment</strong> | OSD review of the Safety Case to provide support to an <strong>acceptance decision</strong>. |
| <strong>Assessment brief</strong> | The <strong>case note</strong> forwarded to an assessor and/or topic manager by a DCM proposing the <strong>assessent</strong> work for a <strong>topic</strong>, including the deadlines for completion in line with the <strong>Safety Case plan</strong>. |
| <strong>Assessment case</strong> | The <strong>case note</strong> records the scope of the assessment, and the deficiencies identified and sent to the |</p>
<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td>Assessement completion report</td>
<td>The proforma case note forwarded to the case manager, which records the results of assessment and contains advice on the adequacy of the material presented in relation to the scope of assessment for that topic.</td>
</tr>
<tr>
<td>Case note</td>
<td>The proforma used for documenting internal correspondence relating to Safety Case handling and assessment.</td>
</tr>
<tr>
<td>Close out report</td>
<td>The report for the operations manager’s authorisation compiled by the DCM and approved by the case manager. Outlines the process and matters raised, and the duty holder responses from which the acceptance/rejection recommendation was derived.</td>
</tr>
<tr>
<td>Corporate Operational Intelligence System (COIN)</td>
<td>The computer system used to record Safety Case assessment and hold details of case notes, issue notes and letters.</td>
</tr>
<tr>
<td>Deficiency</td>
<td>A deficiency in information or with a demonstration identified during assessment that needs to be raised with the duty holder. If a deficiency is such that, if not resolved, it will result in the assessor considering that the case is inadequate with respect to the topic, the deficiency should be raised as a level 1 issue.</td>
</tr>
<tr>
<td>Duty holder</td>
<td>The person with the legal duty to submit the safety case or notification to HSE.</td>
</tr>
<tr>
<td>Generic matter</td>
<td>A matter identified during the assessment of a Safety Case for which HSE has yet to reach a consensus on what is required, or it has not yet been publicised to the industry.</td>
</tr>
<tr>
<td>Level 1 issue note</td>
<td>A proforma used as the formal means of raising a deficiency that if not resolved may prevent acceptance of the Safety Case.</td>
</tr>
<tr>
<td>Key dates</td>
<td>The dates in the Safety Case plan by which the following actions should be taken, where relevant.</td>
</tr>
<tr>
<td></td>
<td>1) Start date</td>
</tr>
<tr>
<td></td>
<td>Case received and distributed, DCM starts their assessment and drafting of assessment brief.</td>
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<tr>
<td></td>
<td>2) Assessment brief issued</td>
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</tbody>
</table>
DCM issues assessment brief to assessors, allowing topic assessment to begin.

3) **Issues raised date**

CM sends issues requiring resolution to **duty holder**.

4) **Responses due from duty holder date**

Responses to issues raised due from **duty holder**.

5) **Stocktaking checkpoint date**

The case manager initiates a stocktake to check progress and identify what remains to be done.

6) **Topic assessment completion date**

Assessors complete their assessment and send completion reports to the DCM.

7) **Acceptance decision date**

Operations manager decides on the acceptability of the case.

<table>
<thead>
<tr>
<th><strong>Owner or operator</strong></th>
<th>The person with the legal duty to submit Safety Cases and notifications to HSE. (Synonymous with <strong>duty holder</strong>).</th>
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</thead>
<tbody>
<tr>
<td><strong>The regulations</strong></td>
<td>The Offshore Installations (Safety Case) Regulations 2005</td>
</tr>
<tr>
<td><strong>Response</strong></td>
<td>The <strong>duty holder's</strong> formal reply to an <strong>issue note</strong>.</td>
</tr>
<tr>
<td><strong>Review</strong></td>
<td>The procedure in SCHAM for the <strong>duty holder</strong> to challenge an HSE decision not to accept a Safety Case.</td>
</tr>
<tr>
<td><strong>Safety case plan</strong></td>
<td>The plan that identifies every Safety Case and shows when each <strong>assessment</strong> is expected to start and finish, the probable composition of the assessment team, and the <strong>key dates</strong> by which certain actions are to be completed.</td>
</tr>
<tr>
<td><strong>Safety case system</strong></td>
<td>The process of assessment of Safety Cases, inspection of notifications and thorough reviews, and handling of associated documentation.</td>
</tr>
<tr>
<td><strong>Topic</strong></td>
<td>Any subject within a <strong>topic area</strong>.</td>
</tr>
<tr>
<td><strong>Topic area</strong></td>
<td>The range of <strong>topics</strong> covered by a management grouping.</td>
</tr>
<tr>
<td><strong>Topic guidance</strong></td>
<td>Guidance available to assist in assessment.</td>
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