

11 MAJOR ACCIDENT PREVENTION POLICY (MAPP) AND SAFETY MANAGEMENT SYSTEM (SMS) ASPECTS OF SAFETY REPORT ASSESSMENT

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1. INTRODUCTION

- 1.1** This guidance is for assessors completing the MAPP and SMS assessment and is relevant to all types of safety report.
- 1.2** All MAPP and SMS assessments must use the criteria and guidance set out in Appendix: 11.1 '*MAPP and SMS - Assessment Criteria and Guidance*'.
- 1.3** MAPP and SMS assessment must be recorded on the form SRAM 15 '*MAPP and SMS - Assessment Record*'.
- 1.4** The criteria are designed to follow in sequence the specific requirements set down in Regulation 7, Schedules 2 and 3 of the 2015 COMAH regulations and to reflect relevant purposes set out in Regulation 8 of the same regulations. These are minimum legal requirements and are clear and enforceable (Regulation 9).
- 1.5** **Assessment criteria and guidance for MAPP and SMS aspects of a safety report have been revised for SRAM 2015.**

The key objectives in making the changes have been:

- a. To ensure the assessment criteria take account of new content requirements for COMAH 2015 safety reports;
- b. To remove duplication where it previously existed;
- c. To add clarity in terms of what the assessor should be looking for when they carry out assessment of MAPP and SMS aspects.

Duplication has been removed by rationalising and merging criteria that were previously separate but strongly related, or in some cases by removing aspects that are already subject to more in depth assessment by a different assessment discipline – for MAPP and SMS the other disciplines are usually Human Factors and Environment.

This means a change to the numbering of MAPP and SMS assessment criteria. For more detail, refer to Appendix 11.2 - *'MAPP and SMS - Changes to Assessment Criteria and Guidance'*, which maps the change in criteria numbering and describes in broad terms the reasons for adjustments in specific criteria.

1.6 Demonstrations should be proportionate to the hazard and risks of identified major accident hazards. This aspect can only be decided by an operator when all the elements of Schedules 2 and 3 have been determined. The determination of proportionality is an iterative process both for an operator and an assessor.

1.7 Use of Assessment Criteria

The criteria will be applied by a competent assessor against the content of the safety report. In this context, a competent assessor will have a good understanding of the safety report assessment process, its place within the HID Regulatory Model and of any stated benchmarks.

- a. Criteria will be **"met"** when all relevant items are included in descriptions and the necessary supporting information has been provided;
- b. Criteria will be **"not met"** when all relevant items are not included in descriptions or the necessary supporting information has not been provided;
- c. Criteria will be **"not relevant"** when they are not relevant to the establishment;
- d. Criteria will be **"previously met"** when the previous assessor recorded the criterion as "met".

2. RELEVANT REQUIREMENTS OF THE COMAH REGULATIONS 2015

2.1 Regulation 8(a) states that one of the purposes of the safety report is for demonstrating that a major accident prevention policy (MAPP) and a safety management system (SMS) for implementing it have been put into effect in accordance with the information set out in Schedule 3 of the Regulations.

2.2 Regulation 7 specifies that every operator must prepare and retain a written MAPP, which for upper-tier operators must be included as a separate document in the safety report. The MAPP must be designed to ensure a high level of protection of human health and the environment; be proportionate to the major accident hazards; set out the operator's overall aims and principles of action; and set out the role and responsibility of management, and its commitment towards continuously improving the control of major accident hazards.

2.3 Schedule 3 of the Regulations specifies the minimum data and information to be included in a safety report. Paragraph 2 of Schedule 3 requires that information on the management system and on the organisation of the establishment with a view to major accident prevention should include the matters set out in Schedule 2 in relation to the safety management system.

3. GENERAL APPROACH TO MAPP AND SMS ASSESSMENT

3.1 Assessment of MAPP and SMS aspects should usually be undertaken by the HSE Regulatory Inspector. The focus of the assessment is principally on the individual elements contained within Regulation 7 and Schedule 2 of COMAH 2015, and on the extent to which the safety report is able to show how those elements work together to create an appropriate Major Hazard Management System for the establishment concerned.

3.2 It should be noted that some aspects of the SMS are subject to assessment by Human Factors and Environment Assessors, who do so using separate criteria and guidance.

3.3 Use of examples in the Safety Report

There is no specific requirement for operators to include copies of operating procedures and/or associated documentation in their safety reports; the operator should determine the level of information to be provided in support of a given demonstration or requirement in Schedules 2 and 3 for the MAPP and SMS. Some operators choose to assist their demonstrations where necessary, by summarising a given procedure and providing an example of related documentation in support of it; for example a summary of the key points of a permit to work procedure alongside a completed permit to work record.

4. BENCHMARKS

4.1 In relation to the assessment of a MAPP, the assessor should understand the elements of COMAH Regulation 7 and the associated guidance in L111. For the SMS assessment, the assessor should understand the content of Schedule 2 of the COMAH Regulations and the guidance relating to it.

4.2 The elements of an SMS listed at Schedule 2 of the Regulations, are broadly similar to the approach set out in the HSE publication HSG65, 'Managing for Health and Safety' (Third edition). The assessment criteria and guidance which follow are set out under headings taken from the Plan, Do, Check, Act approach of HSG65.

4.3 It is important to remember however, that there is no legal requirement for operators to present information about their MAPP's and SMS's using the HSG65 approach, and that there are other, equally valid models describing the interrelationship between the key elements of a successful safety management system.

5. PROPORTIONALITY

5.1 The MAPP and SMS assessment should take into account the wider Schedule 3 safety report content. In doing so, the assessor can better understand what constitutes an appropriate MAPP and SMS for a given establishment and therefore, what is reasonable in terms of assessment proportionality.

6. PRE-CONSTRUCTION AND PRE-OPERATION SAFETY REPORTS

6.1 Pre-Construction Safety Reports (PCSRs) and Pre-Operation Safety Reports (POSRs) should demonstrate adequate management of design, construction and commissioning processes prior to the introduction of dangerous substances. The operator should normally be able to provide a POSR that covers the relevant MAPP and SMS requirements of the COMAH

Regulations as this report remains live and subject to update, up to and including the five yearly review.

6.2 Plant design often undergoes considerable development before and during the construction period and effective management and communications interfaces between operator, contractors and subcontractors is required. Particular MAPP and SMS issues affecting PCSRs or POSRs, as appropriate, include:

- Change management (design management and change approval, document control, etc.) during construction and commissioning;
- Competency of designers, construction teams, contractor teams;
- Management of temporary arrangements or constraints during design, construction and commissioning;
- Construction verification systems and commissioning controls. Post commissioning checks;
- Identification of key roles and responsibilities for management of major hazards;
- Communications between operator, designers, construction personnel, commissioning personnel, the CA and other affected parties;
- SMS review and revision process prior to operation.

6.3 Where there are significant gaps in MAPP and SMS content for a PCSR it may be acceptable and pragmatic to allow the information to be provided in the POSR submission. However, significant gaps in required information for a POSR should be strongly justified and accompanied by a revision plan, agreed between the CA and the operator, to ensure the timely and satisfactory delivery of the missing content.

7. POTENTIAL SERIOUS DEFICIENCY AND SIGNIFICANT OMISSION

7.1 Examples of potential serious deficiencies (as described in the safety report) include but are not limited to:

- (i) There is no safety management system described in the safety report.
- (ii) A series of incomplete demonstrations, indicating an uncoordinated approach to the SMS.

7.2 Significant omissions in the content of the safety report may include:

- (i) Failure to describe the change management process at the establishment.
- (ii) Failure to include a copy of the MAPP.

Appendix: 11.1 - ‘MAPP and SMS - Assessment Criteria and Guidance’

TECHNICAL CRITERION		GUIDANCE
HSG 65	‘PLAN’	
<p>11.1 MAPP Aims and Principles The MAPP should include a commitment to achieve a high standard of protection for people and the environment Regulation 7(2)</p>	<p>To meet this criterion, the MAPP should contain a suitable statement of the operator’s aims and principles of action and its commitment towards continuously improving its control of major accident hazards at the establishment.</p> <p>COMAH 2015 REQUIREMENT Upper tier operators must have a standalone MAPP document, a copy of which must be included in the safety report; the MAPP must specifically address major accident hazards; and the protection of people and the environment in relation to that establishment.</p>	
<p>11.2 MAPP and SMS Objectives The MAPP should include a commitment to provide and maintain a management system to address the following issues: <i>a) organisation and personnel</i> <i>b) identification and evaluation of major hazards</i> <i>c) operational control</i> <i>d) management of change</i> <i>e) planning for emergencies</i> <i>f) monitoring performance</i> <i>g) audit and review</i> Regulation 7(7)and (8) Schedule 2 para 2</p>	<p>To meet this criterion, where there is already a statement of commitment to achieving a high standard of protection for people and the environment included in the MAPP, this should be supported by including in the MAPP, appropriate objectives under each of the elements listed in criteria 11.2 (a) to (g).</p> <p>Note that, for this criterion, we are only looking for the policy statements; subsequent criteria look at the detail under each heading to demonstrate that there is the SMS to implement the MAPP.</p> <p>COMAH 2015 REQUIREMENT COMAH 2015 brought in a new requirement for the MAPP to set out the commitment of management towards continuously improving the control of major accident hazards. The SMS should show In terms of the SMS, the safety report should describe how the principle of continuous improvement is applied by relevant personnel to the elements listed (a) to (g).</p> <p>[Note – There is a strong link between this criteria and 11.11]</p>	
<p>11.3 Senior Level Endorsement The MAPP should be set at a senior level in the operator's organisation and be established in writing. Regulation 7(1)</p>	<p>To meet this criterion, the copy of the establishment’s MAPP included in the safety report should be signed and dated by the most appropriate person, e.g. Company Director or Senior Executive.</p>	

Appendix: 11.1 - 'MAPP and SMS - Assessment Criteria and Guidance'

TECHNICAL CRITERION	GUIDANCE
HSG 65	'DO'
<p>11.4 Roles and Responsibilities The safety report should show that all necessary roles and responsibilities in the management of major hazards have been clearly allocated and defined Schedule 2 para 2(a)</p>	<p>To meet this criterion, within the safety report, typically an organogram, table or similar is shown, which highlights the roles, responsibilities and accountabilities across the organisation, for all staff who have duties to manage major accident hazards.</p> <p>Additional information should support the high level view and would usually include:</p> <ul style="list-style-type: none"> • Job descriptions or details of individual responsibilities in relation to the management of major hazards • Identification of post holders with key responsibilities • Reference to how jobs should be done, for instance by using company standards or procedures
<p>11.5 Resources The safety report should show how the operator allocates resources to implement the MAPP Schedule 2 para 1(c)</p>	<p>To meet this criterion the safety report should show:</p> <ul style="list-style-type: none"> • Who has overall responsibility for the safe operation of the establishment • How key roles are identified and filled • Details of any qualifications, skills or experience required for each post • How training for those staff is delivered, verified and assessed • Deputising arrangements you have in place for each function to cover absences • An overview of any key roles contractors may have on site and how training is carried out and verified for those workers • A brief explanation of the arrangements for securing financial resources to carry out upgrades or improvements identified by risk management processes
<p>11.6 Personal Performance The safety report should show that the performance of people having a role to play in the management of major accident hazards is measured and that they are held accountable for their performance Schedule 2 para 2(a)</p>	<p>This concerns the people having a role to play in the management of major accident hazards and to meet this criterion, the report should provide a brief outline of:</p> <ul style="list-style-type: none"> • How the responsibilities are made clear to the jobholder (e.g. job descriptions) • How the performance review and appraisal systems works • How compliance checking arrangements are carried out. <p>The report should also provide :</p> <ul style="list-style-type: none"> • Information about procedures for identifying and taking action on failures to achieve satisfactory performance; • Reference to disciplinary procedures and incentive and reward schemes; • Summaries of arrangements for setting performance standards and targets for line managers.

Appendix: 11.1 - 'MAPP and SMS - Assessment Criteria and Guidance'

TECHNICAL CRITERION	GUIDANCE
<p>11.7 Worker Involvement The safety report should show that the operator has systems for ensuring that those working in the establishment are actively involved in the control of major accident hazards.</p> <p>Schedule 2 para 2(a)</p>	<p>To meet this criterion, the report should typically include:</p> <ul style="list-style-type: none"> • a brief summary of how consultations with the workforce are carried out (e.g., safety meetings); • an outline of the arrangements for upward reporting of information relevant to the control of major hazards; • how employee involvement is secured in relation to: <ul style="list-style-type: none"> i) hazard studies (e.g. HAZOP) and risk assessments; ii) setting standards relevant to the control of major accident hazards iii) devising, reviewing and revising operating and emergency systems, procedures and instructions for the control of major accident hazards iv) performance measuring activities including accident, incident and near miss investigations; v) audit and review activities.
<p>11.8 External Organisations The safety report should show that the operator has in place arrangements for co-operating with, communicating information to and securing the co-operation of, other organisations.</p> <p>Regulation 12(5) Schedule 2 para 2(a)</p>	<p>To meet this criterion, a brief overview should outline the operator's arrangements for communicating and cooperating with external organisations. This includes:</p> <ul style="list-style-type: none"> • operators of other establishments which might be affected by the major accident hazards; • contractors and their employees; • the emergency services; • the authorities responsible for preparation and maintenance of external emergency plans; • employers' associations • other relevant bodies
<p>11.9 Intelligence Gathering The safety report should show that the operator has arrangements for gathering intelligence needed for the control of major accident hazards from external sources.</p> <p>Regulation 10 Schedule 2 para 2(b) and Schedule 3 para 5(c)</p>	<p>An operator's management of major accident hazards requires them to keep up to date with legal and technical developments that are relevant to their establishment. Regulation 10(2)(b) requires the operator to review the safety report when it is necessary to do so to take account of new technical knowledge and developments in knowledge concerning the assessment of hazards.</p> <p>To meet this criterion, the report should provide a description of the operator's arrangements for ensuring they are aware of important safety intelligence such as:</p> <ul style="list-style-type: none"> • changes in legislation, developments in technical standards and management practices; <p>Operators often describe receiving information from, for example: enforcing authorities; professional bodies; industry associations; emergency services; other companies; local authorities etc.</p> <p>COMAH 2015 REQUIREMENT</p>

Appendix: 11.1 - 'MAPP and SMS - Assessment Criteria and Guidance'

TECHNICAL CRITERION	GUIDANCE
	<p>COMAH 2015 brought in a new requirement for the safety report to provide a review of past accidents and incidents with the same substances and processes used, consideration of lessons learned from these, and explicit reference to specific measures taken to prevent such accidents. The information provided should be in relation to major accident hazards and with consideration to what is relevant and practical.</p> <p>The Predictive assessment considers how such information has been used to develop risk controls, the focus here is on the arrangements made by the establishment to obtain and review relevant information i.e. how they approached the task; experience / competence of those involved; how the findings have been used at the establishment.</p>
<p>11.10 Internal Communication The safety report should show that the operator has arrangements for communicating information important for the control of major accident hazards within the operator's organisation. Schedule 2 paras 2 (a) and (c)</p>	<p>To meet this criterion, the following would typically be included within this section of the report:</p> <ul style="list-style-type: none"> • A brief description of how the information pertinent to the control of major accidents is disseminated throughout the organisation, this should include: <ul style="list-style-type: none"> i) Information relating to the aims and purpose of the MAPP ii) Information relating to relevant risk control systems in place iii) How suggestions for improvements can be made iv) The purpose of monitoring and auditing activities v) How lessons learned are acted upon
<p>11.11 Priorities for Improvement The safety report should show that the operator has systems for: <i>a) determining priorities to achieve the objectives of the MAPP; and</i> <i>b) identifying areas for necessary improvement in relation to the control of major accident hazards; and</i> <i>c) scheduling that necessary improvement work</i> Schedule 2 paras 2(a) and (c)</p>	<p>To meet this criterion, the report should typically provide:</p> <ul style="list-style-type: none"> • A brief outline of the arrangements for improvement planning. This should include methods for the identification of necessary measure and how decisions on what is reasonably practicable are made. • An explanation of how work identified as part of the improvement planning process is prioritised, resourced, scheduled and how timescales for completion are set; • Information relating to current backlogs of improvement work including overdue maintenance schedules, with a brief explanation regarding how these are being progressed. <p>Some operators support their demonstration by providing a copy of their current improvement plan in the safety report.</p>

Appendix: 11.1 - ‘MAPP and SMS - Assessment Criteria and Guidance’

TECHNICAL CRITERION	GUIDANCE
<p>11.12 Procedures The safety report should show that the operator has adopted procedures and instructions for safe operation, including maintenance, of plant, processes, equipment and temporary stoppages. Schedule 2 para 2(c)</p>	<p>This criterion is about the report describing the risk control systems which the operator has in place for controlling the risks which arise at each stage of the life cycle of the plant, processes or storage facilities in question. To meet this criterion, the report should describe the systems for controlling risks at each of the following stages as appropriate:</p> <ol style="list-style-type: none"> i. Construction and commissioning of plant, processes, equipment and facilities; ii. Operation of plant and processes Including as appropriate, start-up, steady state running, normal shutdown, detection of departures from normal operating conditions and responses to them including emergency shutdown and temporary and special operations; iii. Safe operation under maintenance conditions [other elements of which are assessed by Human Factors 12.2.4.2] Including carrying out risk assessment for decontamination and maintenance work, generating safe methods of working for maintenance and using permit-to-work systems to control it; iv. Selection and management of contractors [other elements of which are assessed by Human Factors 12.2.4.3] How contractors are selected, managed, inducted, and where appropriate, trained. role of contractors. The role contractors have in construction, commissioning or decommissioning activities. v. Decommissioning of plant, processes, equipment and facilities. <p>Some operators support their demonstration by providing copies of their control of contractors’ procedure and permit to work procedure (or summarised versions) in the safety report.</p>
<p>11.13 Management of Change The safety report should show that the operator has adopted procedures for planning modifications to, or the design of new installations, processes or storage facilities. Schedule 2 para 2(d)</p>	<p>To meet this criterion, the report should describe the ‘Management of Change’ processes used. This should include:</p> <ul style="list-style-type: none"> • The definition of what constitutes a change; • How the change is recorded; • How assessment of any changes is carried out and by whom; • Identification and implementation of control measures deemed necessary as a result of the change • Information relating to how often the system is used, and for what type of changes; • Details of any competence requirements for those staff involved in the change procedures; • Responsibilities for authorising and initiating work on the proposed changes; • Details of how pre / post commissioning checks and reviews are carried out; <p>[Human factors assessment covers management of organisational change]</p> <p>Some Operators support their demonstration by providing a copy of their management of change procedure (or a summarised version) along with a completed example of a recent change in the safety report.</p>

Appendix: 11.1 - 'MAPP and SMS - Assessment Criteria and Guidance'

TECHNICAL CRITERION		GUIDANCE
HSG 65	'CHECK'	
11.14 Active Monitoring The safety report should show that the operator has devised proactive means of performance measurement, which provide information on whether the measures taken to guard against major accident scenarios are operating as intended. Schedule 2 para 2(f)	This criterion recognises that in the case of major accident hazards, a low incident rate is no guarantee that risks are being effectively controlled. To meet this criterion, the report should provide: <ul style="list-style-type: none"> • A description for the basis of measuring process safety performance indicators which follows the guidance set out in HSG254, or similar; • Information relating to a set of leading process safety performance indicators. In particular, the report should show that <ul style="list-style-type: none"> • Key risk control systems, necessary for the control of major accidents have been identified and that there is a process for gathering data on the performance of the risk control system; • Tolerance levels have been set for each performance measurement; • Senior management are actively involved in setting performance indicators and tolerance levels. 	
	Typically the report might include examples of the types of PSPIs measured, a summary of significant findings and how senior management acted upon those findings.	
11.15 Reactive Monitoring The safety report should show that the operator has adopted a system for reporting incidents and near misses, particularly those involving failure of the protective measures for control of major accident hazards. Schedule 2 para 2(f)	Following on from criterion 11.14, the report should show that there is an established a set of lagging process safety performance indicators which follow the guidance set out in HSG254 (Developing Process Safety Indicators), or similar. To meet this criterion it should be shown that senior management receive relevant information on: <ul style="list-style-type: none"> • Major accidents as defined in COMAH • Injuries and cases of ill health • Incidents with the potential for harm for major accidents (near misses) • Hazardous conditions, including process deviations or losses of containment [Human Factors consider the behavioural aspects of this criterion]	
INVESTIGATION AND RESPONSE		
11.16 The safety report should show that the operator has adopted mechanisms for investigation and taking corrective action:	Within the report, information should be provided on the actions taken by the Operator in response to data received through monitoring arrangements. Typically this would be: <ul style="list-style-type: none"> • A description of the arrangements in place for carrying out investigations, including how the type and level of investigation is 	

Appendix: 11.1 - 'MAPP and SMS - Assessment Criteria and Guidance'

TECHNICAL CRITERION	GUIDANCE
<p><i>(a) in cases of the proactive performance measures showing a deterioration in risk control measures, and</i> <i>(b) in relation to any incident or event with potential to cause a major accident.</i> Schedule 2 para 2(f)</p>	<p>determined and what outputs are expected. (e.g. – underlying and immediate causes); and</p> <ul style="list-style-type: none"> • A clear link between your monitoring arrangements (both active and reactive) and any initiation of corrective action taken by the Company to remedy any failings found. • How the company respond to necessary corrective action work identified by third party audits, inspection reports or similar, and how these are prioritised. <p>[Human Factors assessment considers underlying human failure elements]</p>
<p>Audit and Review</p>	
<p>11.17 Audit The safety report should show that the operator has adopted a procedure for systematic assessment of the MAPP and the effectiveness and suitability of the SMS. Schedule 2 para 2(g)</p>	<p>To meet this criterion, the safety report should provide a description of auditing activities carried out on site, which is expected to contain the following:</p> <ul style="list-style-type: none"> • the resources and personnel required for each audit, bearing in mind the need for expertise, operational independence and technical support; • the audit plan indicating how it has been prioritised; • the audit protocols to be adopted (which might include the use of questionnaires, checklists, open and structured interviews as well as checking documents and measurements and observations); • the procedures for reporting the audit findings; • the procedures for following up the recommendations shown to be necessary by audits <p>Typically the report may include a copy of an audit plan and an example of a completed audit.</p>
<p>HSG 65</p>	<p>ACT</p>
<p>11.18 Review The safety report should show that the operator has adopted a review process which uses information from performance measurement and audit to facilitate the update of the MAPP and SMS. Schedule 2 para 2(g)</p>	<p>To meet this criterion, the report should describe how information collected from performance measurements and audits is reviewed, and as a minimum, show:</p> <ul style="list-style-type: none"> • How the results are considered and by whom; and • How they are used by senior management to carry out necessary updates of the MAPP and SMS; and • How the suitability and adequacy of the current arrangements for performance standards and audits are assessed.

Appendix: 11.1 - 'MAPP and SMS - Assessment Criteria and Guidance'

TECHNICAL CRITERION	GUIDANCE
<p>11.19 Documenting the Review The safety report should show that results of review are documented. Schedule 2 para 2(g)</p>	<p>To meet this criterion the report should include a description of the operator's arrangements for publishing the results of the review within the organisation.</p>

Appendix: 11.2 - 'MAPP and SMS - Changes to Assessment Criteria and Guidance'

The assessment criteria and guidance for MAPP and SMS aspects of a safety report have been revised for SRAM 2015. The key objectives in making the changes are:

- To ensure the assessment criteria take account of new content requirements for COMAH 2015 safety reports;
- To remove duplication where it previously existed;
- To add clarity in terms of what the assessor should be looking for when they carry out assessment of MAPP and SMS aspects.

Duplication has been removed by rationalising and merging criteria that were previously separate but strongly related, or in some cases by removing aspects that are already subject to more in-depth assessment by a different assessment discipline – for MAPP and SMS the other disciplines are usually Human Factors and Environment.

The rationalisation has resulted in a change to the numbering of MAPP and SMS assessment criteria

The following pages provide a map of the change in numbering and describe in broad terms the reasons for changes in specific criteria.

Criteria for MAPP and SMS			
Number	Old SRAM	Number	SRAM 2015
11.1	The safety report should include a commitment to achieve a high standard of protection for people and the environment. Regulation 5(2)	11.1	MAPP AIMS & PRINCIPLES The MAPP should include a commitment to achieve a high standard of protection for people and the environment. Regulation 7(2) Old SRAM criteria 11.1 and 11.2 now merged into 11.1 for SRAM 2015.
11.2	The safety report should show that the MAPP sets out the operator's overall aims and principles of action with respect to the control of major accident hazards. Schedule 2 para 2	11.1	
11.3	The MAPP should include a commitment to provide and maintain a management system which addresses the following issues: a) organisation and personnel; b) identification and evaluation of major hazards; c) operational control; d) management of change; e) planning for emergencies; f) monitoring performance; g) audit and review. Regulation 5(3), by reference to Schedule 2 para 4	11.2	MAPP AND SMS OBJECTIVES The MAPP should include a commitment to provide and maintain a management system to address the following issues: a) organisation and personnel; b) identification and evaluation of major hazards; c) operational control; d) management of change; e) planning for emergencies; f) monitoring performance; g) audit and review. Regulation 7(7) and (8); and Schedule 2 para 2
11.4	The MAPP should be set at a senior level in the operator's organisation.	11.3	Senior Level Endorsement The MAPP should be set at a senior level in the Operator's organisation and has been established in writing. Regulation 7(1) Old SRAM criteria 11.4 and 11.5 now merged into 11.3 for SRAM 2015.

Criteria for MAPP and SMS			
Number	Old SRAM	Number	SRAM 2015
11.5	The safety report should show that the MAPP has been established in writing. Schedule 2 para 2	11.3	
11.6	The safety report should include sufficient explanation of how the SMS fits into the overall organisational arrangements.	Removed	Not a COMAH 2015 requirement for the safety report - Criteria removed.
11.7	The safety report should show that all necessary roles in the management of major hazards have been clearly allocated. Schedule 2 para 4(a)	11.4	Roles and Responsibilities The safety report should show that all necessary roles and responsibilities in the management of major hazards have been clearly allocated and defined. Schedule 2 para 2(a) Old SRAM criteria 11.7 and 11.8 now merged into 11.4 for SRAM 2015. Human tasks element covered by Human Factors.
11.8	The safety report should show that the responsibilities of everyone involved in the management of major hazards have been clearly defined Schedule 2 para 4(a)	11.4	
11.9	The safety report should describe how the operator allocates resources to implement the MAPP. Schedule 2 para 4(a) and Regulation 4	11.5	Resources The safety report should show how the operator allocates resources to implement the MAPP. Schedule 2 para 1(c) Staffing levels element in previous SRAM criteria now covered by Human Factors assessment.
11.10	The safety report should show that the performance of people having a role to play in the management of major accident hazards is measured and that they are held accountable for their performance. Schedule 2 para 4(a)	11.6	Personal Performance The safety report should show that the performance of people having a role to play in the management of major accident hazards is measured and that they are held accountable for their performance. Schedule 2 para 2(a)

Criteria for MAPP and SMS			
Number	Old SRAM	Number	SRAM 2015
			Supervision and behavioural safety elements are covered by Human Factors assessment.
11.11	The safety report should show that the operator has in place a system for providing and maintaining appropriate levels of management and employee competence. Schedule 2 para 4(a)	Removed	High level aspects of training & competence are covered in 11.9 and 11.10 respectively - other areas are tested via 'Competence' inspection.
11.12	The safety report should show that the operator has systems for ensuring that those working in the establishment are actively involved in the control of major accident hazards. Schedule 2 para 4(a)	11.7	Worker Involvement The safety report should show that the operator has systems for ensuring that those working in the establishment are actively involved in the control of major accident hazards. Schedule 2 para 2(a) Some guidance elements from previous SRAM removed as already assessed by Human factors.
11.13	The safety report should show that the operator has in place arrangements for co-operating with, and securing the co-operation of, other organisations. Schedule 2 para 4(a) and regulation 9(3)	11.8	External Organisations The safety report should show that the Operator has in place arrangements for co-operating with, communicating information to and securing the co-operation of, other organisations. Regulation 12(5) Schedule 2 para 2(a) Old SRAM criteria 11.13 and 11.16 now merged into 11.8 for 2015 SRAM
11.14	The safety report should show that the operator has arrangements for gathering intelligence needed for the control of major accident hazards from external sources.	11.9	Intelligence Gathering The safety report should show that the Operator has arrangements for gathering intelligence needed for the control of major accident hazards from external sources. Regulation 10 Schedule 2 para 2(b) and Schedule 3 para 5(c)
11.15	The safety report should show that the operator has	11.10	Internal Communication

Criteria for MAPP and SMS			
Number	Old SRAM	Number	SRAM 2015
	arrangements for communicating information important for the control of major accident hazards within the operator's organisation. Schedule 2 para 4(a)		The safety report should show that the operator has arrangements for communicating information important for the control of major accident hazards within the operator's organisation. Schedule 2 paras 2 (a) and (c) Staff handover and remote communications elements from previous SRAM moved to Human factors assessment.
11.16	The safety report should show that the operator has arrangements for communicating information relevant to the control of major accident hazards to external organisations. Regulations 9(3), 10(3)&(5), 14, 15 and 16	11.8	
11.17	The safety report should show that the operator has arrangements for systematically identifying major hazards, assessing the risks arising from normal and abnormal operations and determining necessary control measures. Schedule 2 para 4(b)	Removed	Assessed by other disciplines and principally the Predictive assessor. Criterion removed.
11.18	The safety report should show that the operator has systems for identifying areas for necessary improvement in relation to the control of major accident hazards. Schedule 2 para 4(b)	11.11	Priorities for Improvement The safety report should show that the operator has systems for: d) determining priorities to achieve the objectives of the MAPP; and e) identifying areas for necessary improvement in relation to the control of major accident hazards; and f) scheduling that necessary improvement work. Schedule 2 paras 2(a) and (c) Old SRAM criterion 11.18 and 11.19 now merged to form 11.11 for 2015 SRAM
11.19	The safety report should show that the operator has systems	11.11	

Criteria for MAPP and SMS			
Number	Old SRAM	Number	SRAM 2015
	for determining priorities to achieve the objectives of the MAPP and scheduling necessary improvement work in relation to the control of major accident hazards. Schedule 2 para 4(b)		
11.20	The safety report should show that the operator has adopted procedures and instructions for safe operation, including maintenance, of plant, processes, equipment and temporary stoppages. Schedule 2 para 4(c)	11.12	Procedures The safety report should show that the operator has adopted procedures and instructions for safe operation, including maintenance, of plant, processes, equipment and temporary stoppages. Schedule 2 para 2(c) Some of maintenance and inspection / testing are covered by Human Factors assessment
11.21	The safety report should show that the operator has adopted procedures for planning modifications to, or the design of new installations, processes or storage facilities. Schedule 2 para 4(d)	11.13	Management of Change The safety report should show that the operator has adopted procedures for planning modifications to, or the design of new installations, processes or storage facilities. Schedule 2 para 2(d) Human Factors assessment covers Management of Organisational Change
11.22	The safety report should show that the operator has arrangements in place to - identify foreseeable emergencies by systematic analysis - prepare, test and review emergency plans, and - provide specific training for all persons working in the establishment. Schedule 2 para 4e	Removed	These elements are assessed in the Emergency Response Aspects Assessment - Criterion removed.
11.23	The safety report should show that the operator has devised	11.14	Active Monitoring

Criteria for MAPP and SMS			
Number	Old SRAM	Number	SRAM 2015
	<p>proactive means of performance measurement, which provide information on whether the measures taken to guard against major accident scenarios are operating as intended.</p> <p>Schedule 2 para 4(f)</p>		<p>The safety report should show that the operator has devised proactive means of performance measurement, which provide information on whether the measures taken to guard against major accident scenarios are operating as intended.</p> <p>Schedule 2 para 2(f)</p>
11.24	<p>The safety report should show that the operator has adopted a system for reporting incidents and near misses, particularly those involving failure of the protective measures for control of major accident hazards.</p> <p>Schedule 2 para 4(f)</p>	11.15	<p>Reactive Monitoring</p> <p>The safety report should show that the operator has adopted a system for reporting incidents and near misses, particularly those involving failure of the protective measures for control of major accident hazards.</p> <p>Schedule 2 para 2(f)</p>
11.25	<p>The safety report should show that the operator has adopted mechanisms for investigation and taking corrective action:</p> <ul style="list-style-type: none"> a) in cases of the proactive performance measures showing a deterioration in risk control measures; and b) in relation to any incident or event with the potential to cause a major accident. <p>Schedule 2 para 4(f)</p>	11.16	<p>Investigation and Response</p> <p>The safety report should show that the operator has adopted mechanisms for investigation and taking corrective action:</p> <ul style="list-style-type: none"> (a) in cases of the proactive performance measures showing a deterioration in risk control measures, and (b) in relation to any incident or event with potential to cause a major accident. <p>Schedule 2 para 2(f)</p>
11.26	<p>The safety report should show that the operator has adopted a procedure for systematic assessment of the MAPP and the effectiveness and suitability of the SMS.</p> <p>Schedule 2 para 4(g)</p>	11.17	<p>Audit</p> <p>The safety report should show that the operator has adopted a procedure for systematic assessment of the MAPP and the effectiveness and suitability of the SMS.</p> <p>Schedule 2 para 2(g)</p>
11.27	<p>The safety report should show that the operator has adopted a review process which uses information from performance measurement and audit.</p> <p>Schedule 2 para 4(g)</p>	11.18	<p>Review</p> <p>The safety report should show that the operator has adopted a review process which uses information from performance measurement and audit to facilitate update of the MAPP and SMS.</p>

Criteria for MAPP and SMS			
Number	Old SRAM	Number	SRAM 2015
			Schedule 2 para 2(g)
11.28	The safety report should show that results of review are documented. Schedule 2 para 4(g)	11.19	Documenting the Review The safety report should show that results of review are documented. Schedule 2 para 2(g)
11.29	The safety report should show that the operator has adopted a system under which the MAPP and SMS is updated by senior management. Schedule 2 para 4(g)	11.18	Old SRAM criterion 11.27 and 11.29 now merged to form 11.18 for 2015 SRAM