

Guidance for Developing and Managing Procedures

A COS Webinar
September 30, 2020

No discussion or agreements, either explicit or implicit, regarding prices of particular products, services, or commodities nor of individual company scenarios, business plans, purchasing plans, or pricing.

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Special Thanks to the Webinar Contributors

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Agenda



Introduction and Procedure Flow Chart

Kim Forgie



Review of COS-3-06

Work Group Members



Q&A

Brandy Harrington



Conclusion

Kim Forgie



Center for Offshore Safety Releases New Document

COS-3-06 Guidance for Developing and Managing Procedures

COS has recently published COS-3-06, *Guidance for Developing and Managing Procedures* to address operating procedures and safe work practices.

Companies should use this document to implement a systematic procedure to:

- Involve the right personnel in operations;,
- Incorporate appropriate risk controls; and
- Focus on end users at all stages.

COS will also be hosting a free webinar on this important new update on **Wednesday, September 30th at 11am - 1pm EST/ 10am - 12pm CST.** [Register today.](#)

[Download](#)

The **Center for Offshore Safety (COS)** is an industry sponsored group focused exclusively on offshore safety on the U.S. Outer Continental Shelf (OCS). The Center serves the U.S. offshore oil and natural gas industry with the purpose of adopting standards of excellence to ensure continuous improvement in safety and offshore operational integrity.



https://centerforoffshoresafety.org

SEMS GOOD PRACTICES

The Center for Offshore Safety's commitment to learn and continually improve SEMS include resources related to leadership engage

One of the most important roles COS plays is in the development of a strong safety culture based on six safety characteristics from th
Culture Policy Statement: Leadership; Respect and Trust; Environment for Raising Concerns; Open Communication; Personal Accou

Developing and Managing Procedures

This guidance will address operating procedures and safe work practices. Companies can use this document to implement a system
incorporate appropriate risk controls, and focus on end users at all stages.

[COS-248 Guidance for Developing and Managing Procedures](#)

Safety Culture

COS developed guidelines for a robust safety culture to help companies define and develop safety culture characteristics. The docum
outlines, including descriptions of specific safety culture characteristics, factors that encourage and demonstrate a robust safety cul
culture.

[COS 3-01 Guidelines for Robust Safety Culture](#)

SEMS Maturity Self-Assessment

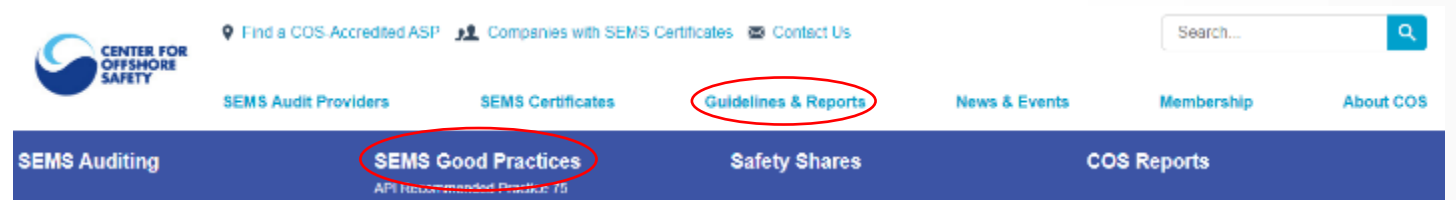
COS offers a maturity assessment tool for organizations to evaluate their SEMS in relation to a fully mature system and to help ident

[COS 3-03 Guidelines for SEMS Maturity Self-Assessment](#)

Skills and Knowledge Management Systems

COS developed guidelines to help understand, develop, and implement an effective Skills and Knowledge Management System.

[COS-3-02 Skills & Knowledge Management System Guidelines](#)



COS Overview

The Center for Offshore Safety is designed to promote the highest level of safety for offshore drilling, completions, and operations through leadership and effective management systems addressing communication, teamwork, and independent third-party auditing and certification.

COS will achieve operational excellence by:

- Enhancing and continuously improving industry's safety and environmental performance,
- Ensuring public confidence and trust in the oil and gas industry,
- Increasing public awareness of the industry's safety and environmental performance,
- Stimulating cooperation within industry to share best practices and learn from each other, and

Providing a platform for collaboration between industry, the government, and other stakeholders.



COS-3-06

GUIDANCE FOR DEVELOPING AND MANAGING PROCEDURES

FIRST EDITION | JANUARY 2020



SEMS AUDIT & CERTIFICATIONS



GOOD PRACTICE DEVELOPMENT



DATA COLLECTION, ANALYSIS & REPORTING



SHARING INDUSTRY KNOWLEDGE



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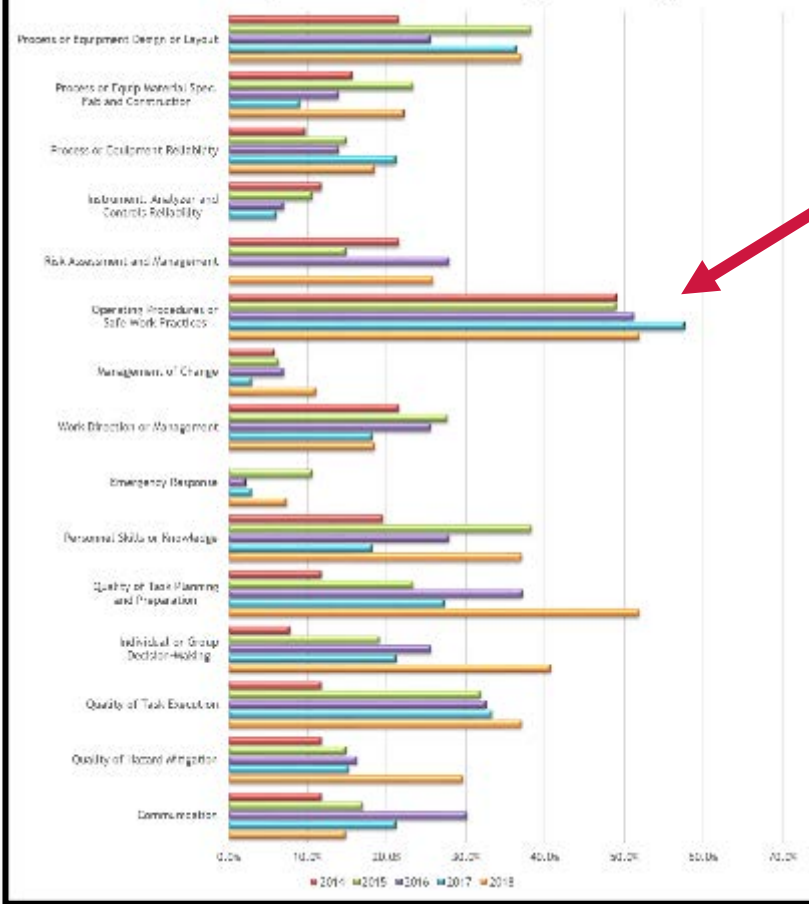
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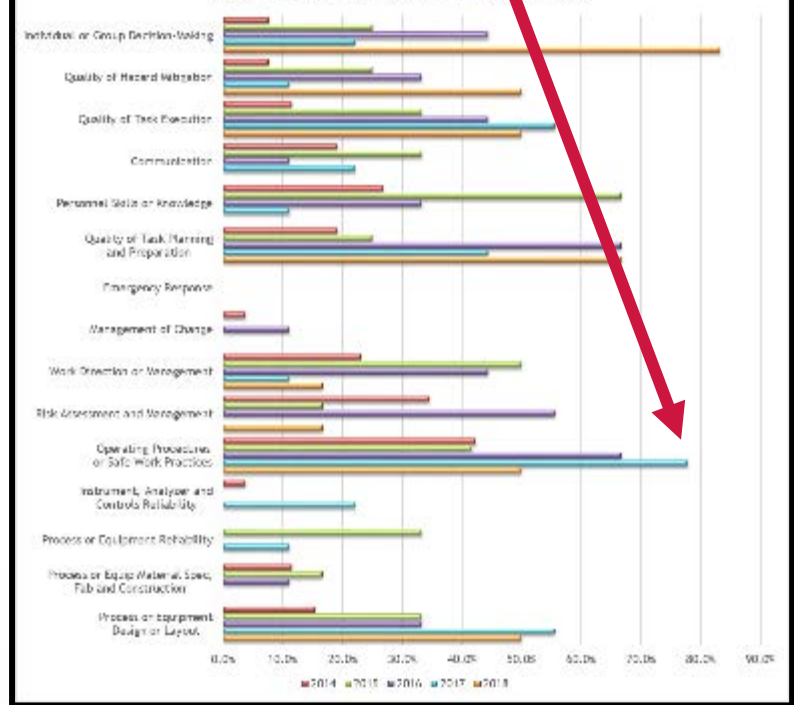
Safety Performance Indicators

Operating Procedures or Safe Work Practices
year over year tagged as
an areas for
improvement.

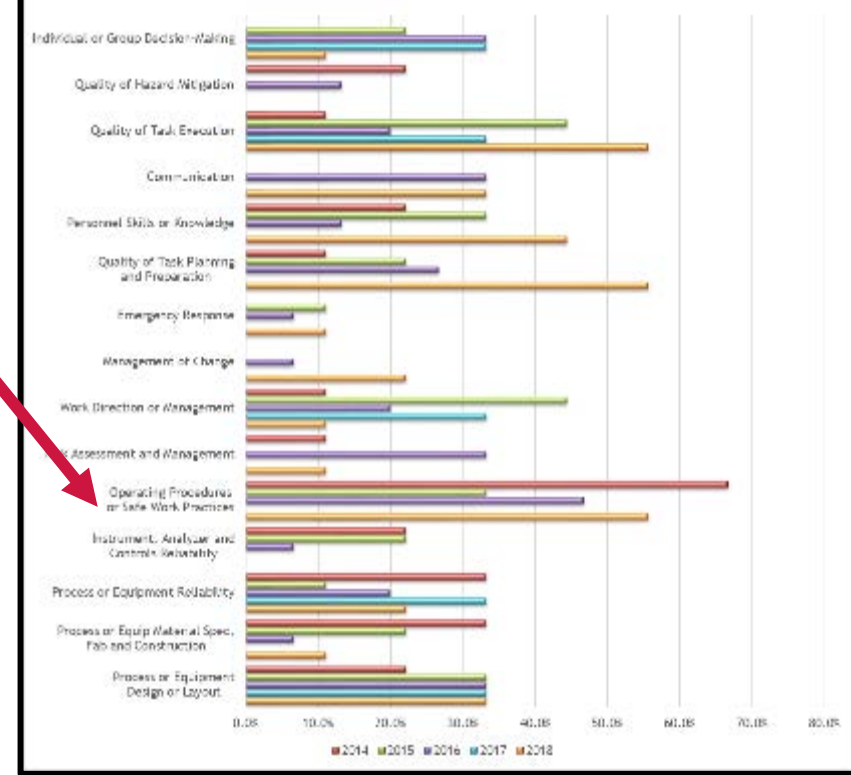
Areas for Improvement Distribution (US OCS only)



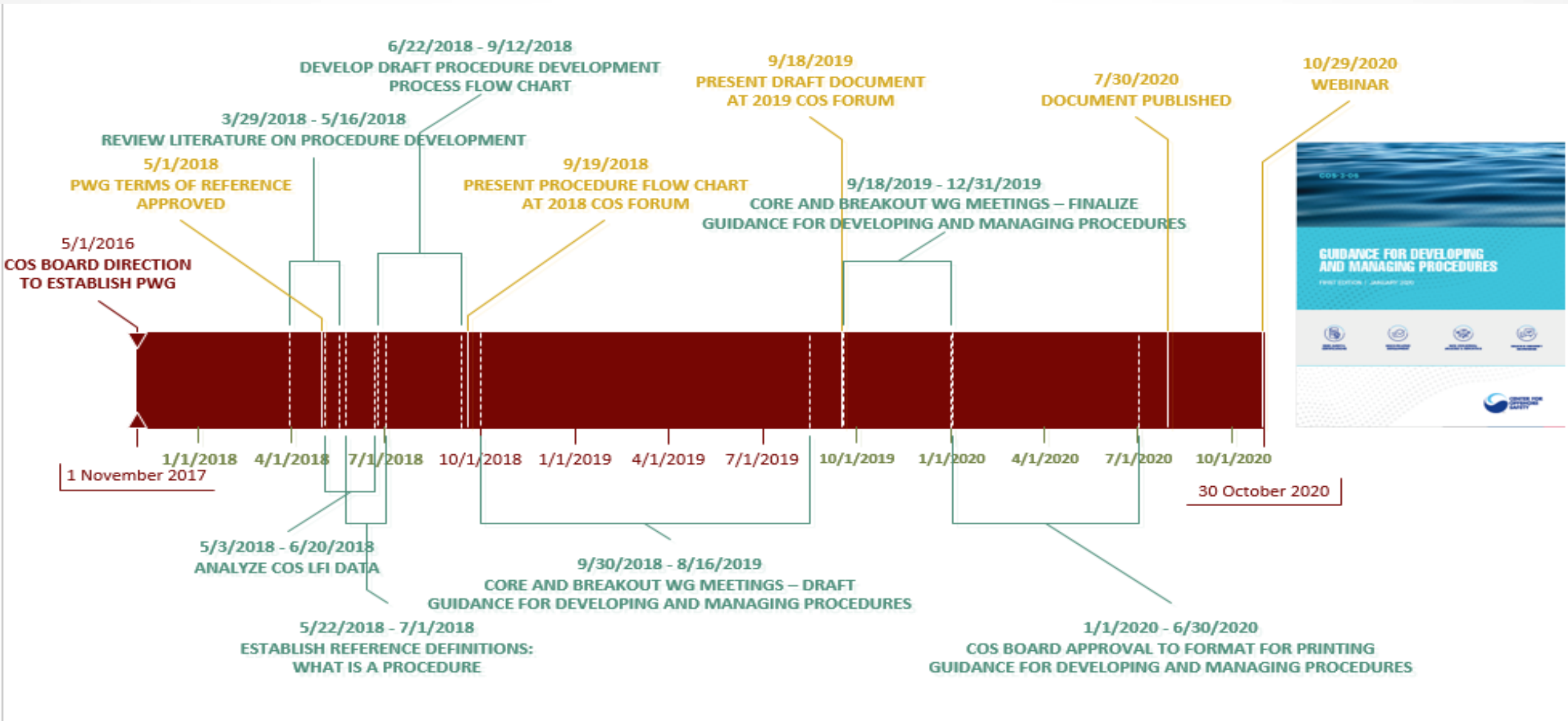
Areas for Improvement - Mechanical Lifting Activity (AFI / Mechanical Lifting Activity Submittals)



Areas for Improvement - Process Safety (SPI 1C and 2A) (AFI / Total PSE)



Timeline for Development

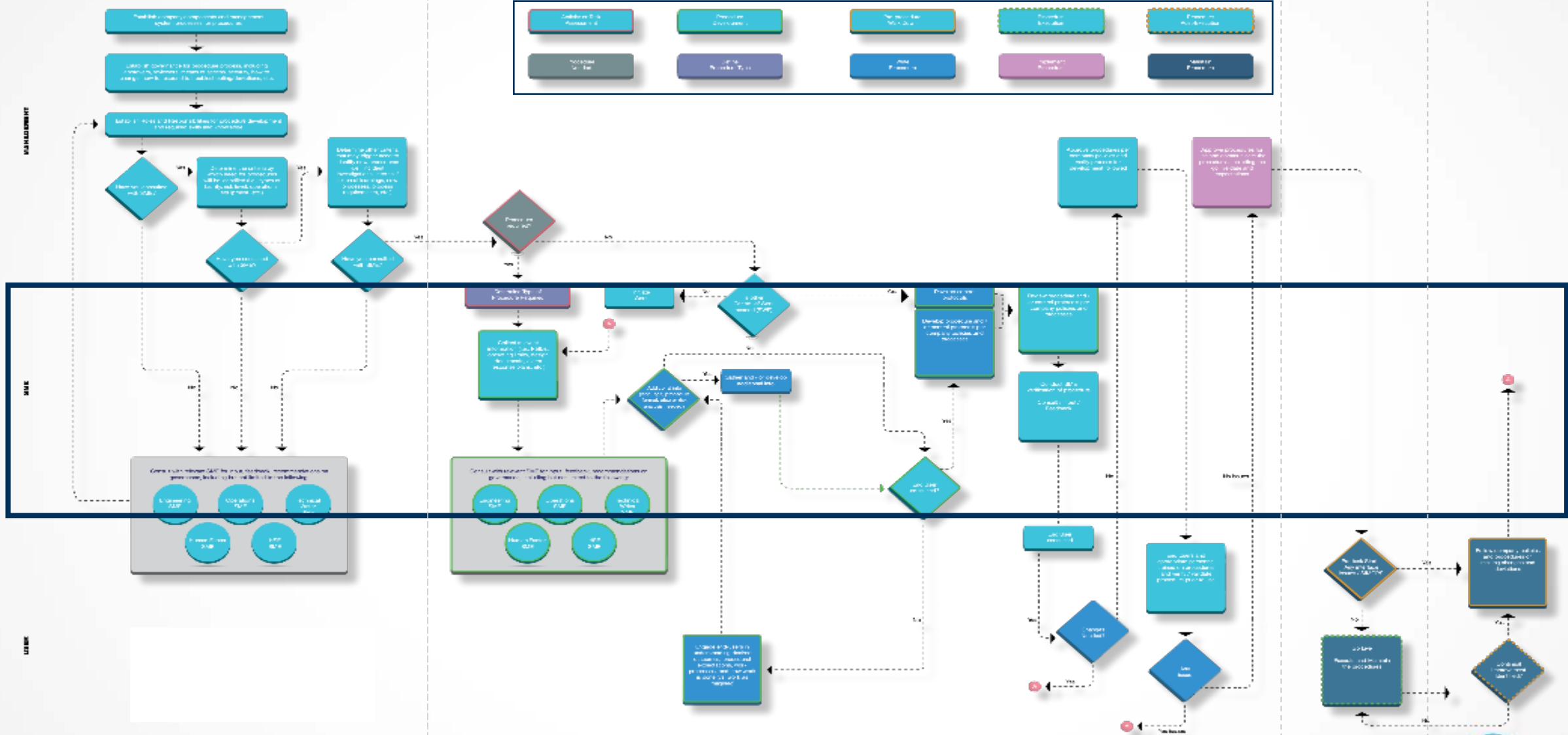


ESTABLISH GOVERNANCE, REQUIREMENTS, AND COMPONENTS

IMPLEMENT GOVERNANCE AND COMPONENTS

MAINTAIN GOVERNANCE, REQUIREMENTS, COMPONENTS, AND RESULTING PROCEDURES

CONTINUAL IMPROVEMENT OF GOVERNANCE, REQUIREMENTS, COMPONENTS, AND RESULTING PROCEDURES



Introduction

- Four Stages
- Systematic Development
- Predictable Outcomes



Definitions



Component – A policy, standard, practice, process, procedure, or control



Convention – The format, writing style, and pictorial style to be used in the preparation of a document

Definitions



Procedure – Approved and documented instructions about a specific task or activity that is used to enable the safe and consistent execution of that task or activity



Validate – To demonstrate that the procedure will consistently yield the desired results



Verify – to demonstrate that the procedure can be consistently performed as written



Establishing Governance

- Structure, Processes, Requirements, and Components
- Define requirements and components to meet requirements
 - Of Company
 - Of Regulatory
- Cover all aspects of procedure development and management

Establishing Requirements

- API RP 75, 4th Edition
- Procedures Element
 - 12 Expectations
 - “Manage risk...through...use of procedures”

Safety and Environmental Management System for Offshore Operations and Assets

API RECOMMENDED PRACTICE 75
FOURTH EDITION, DECEMBER 2019





Section 3.3 ESTABLISHING THE COMPONENT(S) THAT MEET THE REQUIREMENTS

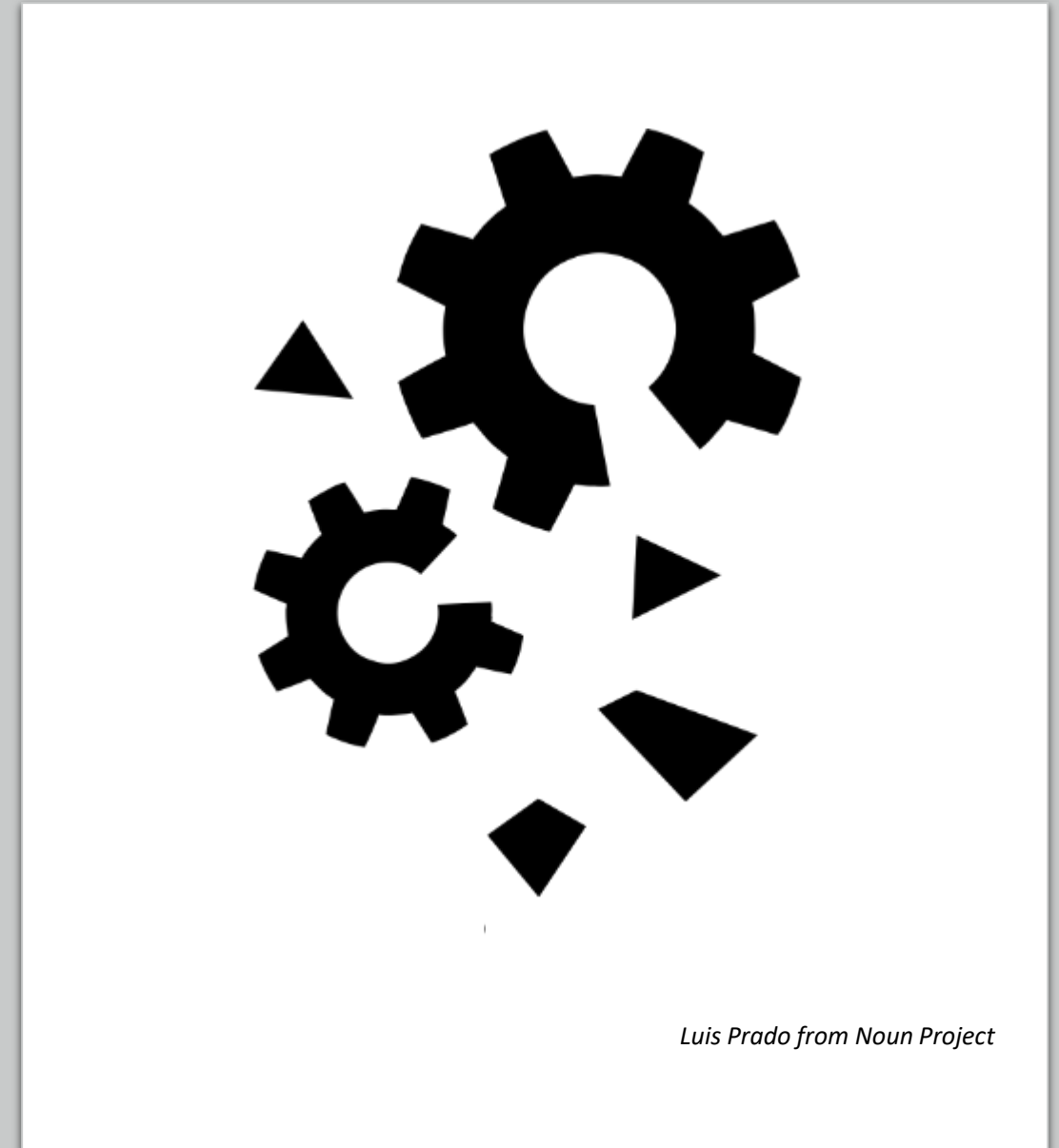
The Company establishes components for how the requirements will be met.

- Component – a policy, standard, practice, process, procedure, or control

Section 3.3.1 TRIGGERS TO CREATING PROCEDURES

Identifying the activities and tasks which require procedures

- Determine criteria that trigger the creation of a procedure
- Typical procedural triggers:
 - Regulatory and legal requirements
 - Contractual requirements
 - Risk Assessments
 - Activity or task analysis
 - Changes
 - Performance outcomes
 - Findings and learnings

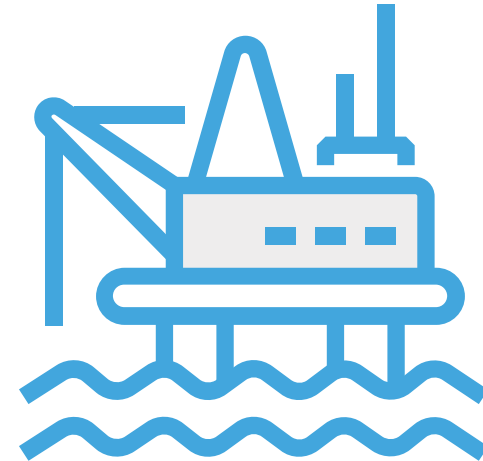


Section 3.3.2

RISK CONTROLS (cont'd)

RISK CONTROL

- Who should be involved?
- What are the outcomes of a risk assessment?
 - type of procedure
 - knowledge and skills needed to develop and manage the procedure
 - risk controls to be incorporated into the procedure

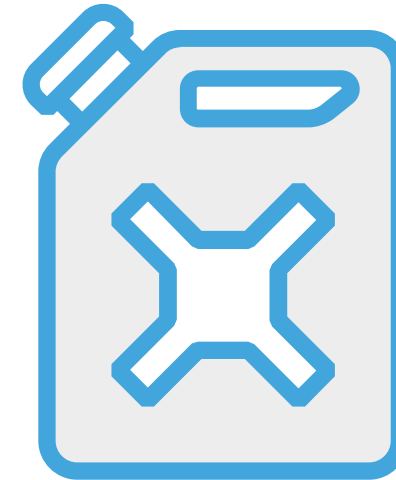


Section 3.3.2

RISK CONTROLS (cont'd)

Factors to consider in determining the type of procedure and level of detail needed:

- Consequences of incorrect execution,
- Nature of the work,
- Frequency the work is performed,
- Complexity of the work,
- Work duration,
- Length of the procedure



Section 3.3.3 PERSONNEL DEVELOPING, APPROVING, MAINTAINING, AND USING PROCEDURES

Determining the roles, responsibilities, authorities, knowledge, and skills of personnel accountable for developing, approving, maintaining, and using procedures

Identify personnel who understand;

- Roles, Responsibilities, Authorities, Knowledge and skills

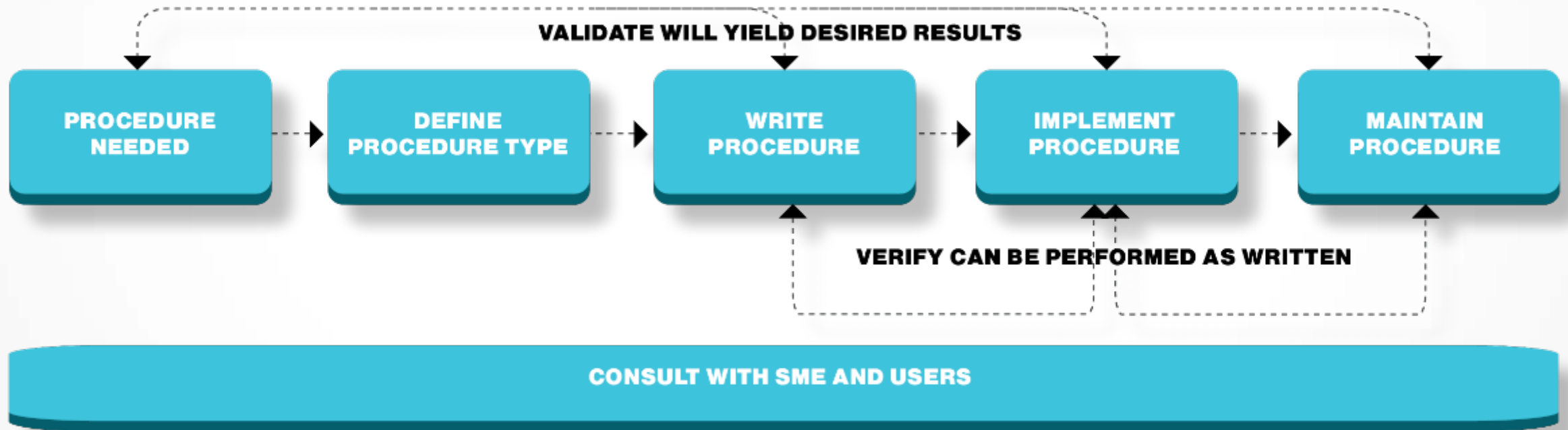
Capabilities;

- Develop, approve, maintain and use the procedures.

There are typically three positions:

- Coordinator
- Subject Matter Expert
- User

This illustration shows the useful sequence of steps required to identify the need, the type, writing, implementing and maintain the procedure.



A generic view of the level of knowledge and skills for given roles and function

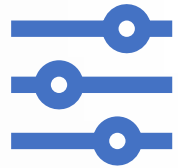
	Procedure Development Process	Activity / Task Design and Purpose	Activity / Task Implementation	Technical Writing
Coordinator	Expert	Awareness	Awareness	Basic
Subject Matter Expert	Basic	Expert	Basic	Basic to Expert
User	Awareness	Basic	Expert	Awareness

Level of responsibilities and knowledge and skills for Procedure Users

Role - Phase	Responsibilities	Knowledge and Skills
Procedure User – Pre-Execution	Stop use if not applicable to work conditions	<ul style="list-style-type: none"> • Activity or Task • Activity or Task Procedure • Situational awareness • Stop Work process
	Use deviation process, if applicable	<ul style="list-style-type: none"> • Deviation process
Procedure User - Execution	Execute as written	<ul style="list-style-type: none"> • Activity or Task • Activity or Task Procedure • Procedure proficiency in use
	Assess application and validity of procedure during use	<ul style="list-style-type: none"> • Activity or Task • Activity or Task Procedure • Procedure expected results • Situational awareness
Procedure User – Post Execution	Review procedure for continual improvement opportunities	<ul style="list-style-type: none"> • Activity or Task • Activity or Task Procedure • Procedure expected results

Section 3.3.4 PROCEDURE TYPES, CONTENT, CONVENTIONS, DELIVER, AND COMMUNICATION

Determining the type, content, conventions, method of deliver, and communication of procedures, taking into account the procedure users



Types



Content



Conventions



Method of Delivery

Section 3.3.5 DEVELOPING, DOCUMENTING, AND APPROVING PROCEDURES

Developing, documenting, and approving procedures

Writing

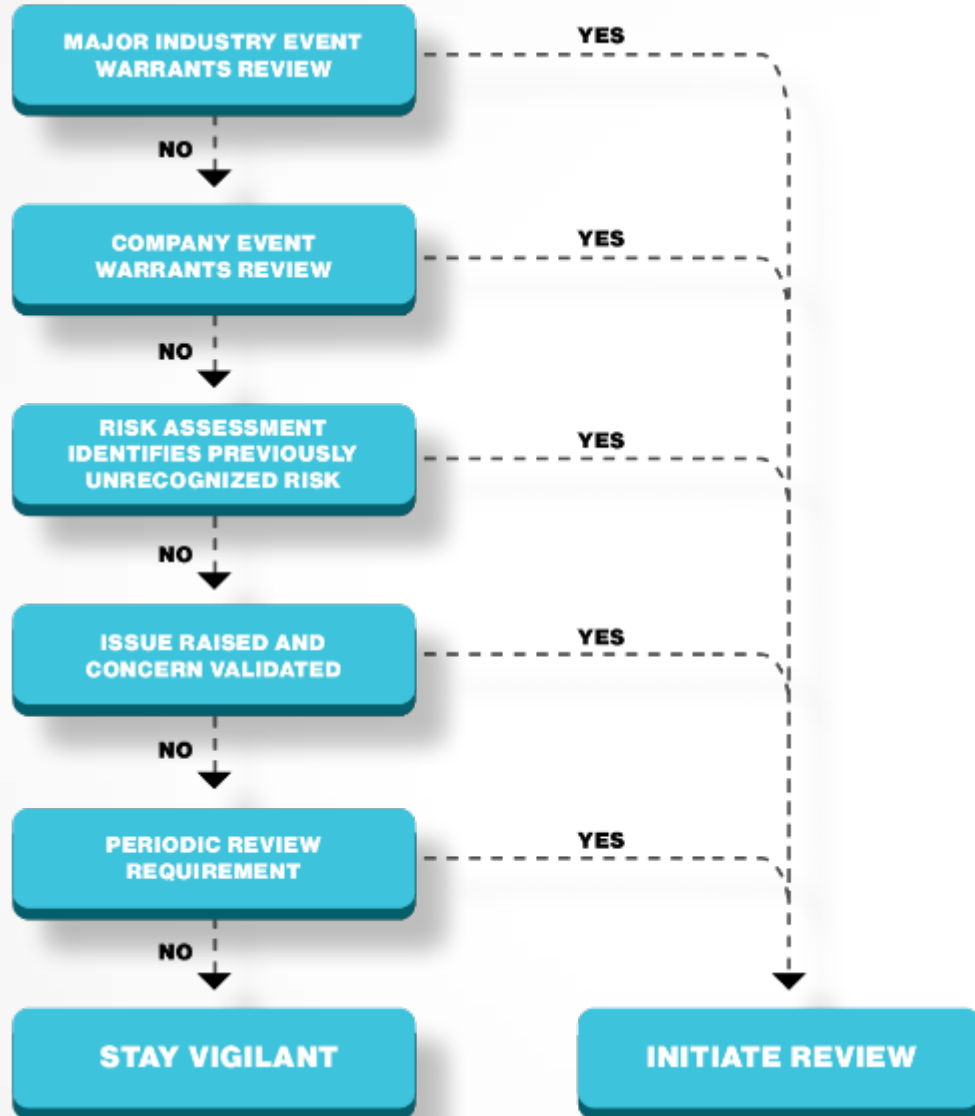
Approving



Verifying &
Validating

Documenting

PERIODIC VERIFICATION AND VALIDATION TRIGGERS



Section 3.3.6 PERIODIC VERIFICATION AND VALIDATION

Initially and periodically verifying procedures can be performed as documented and validating they will consistently produce the desired results

Section 3.3.7 PROCEDURE ACCESS AND USE

Accessing and using procedures as documented

- Who are the users? Procedures users are:
 - Developers, managers, users
- What should they access? Versions of procedures that are:
 - Current, approved, controlled versions
- Controlled versions
 - Electronic format
 - Contingency plan for system outage



Section 3.3.7 PROCEDURE ACCESS AND USE (cont'd)

- Why use procedures?
 - Good practice
 - Set up for success
 - Capture of institutional knowledge
- How to use procedures?
 - Review prior to use and have in hand during execution if appropriate
 - When multiple shifts, allow time for complete shift handover



Section 3.3.8 REQUESTED DEVIATIONS FROM PROCEDURES

Managing requested deviations from procedures



Correct procedure, but cannot use it in current be conditions



Request for deviation from procedure necessary



Should have formal component to manage requested deviations



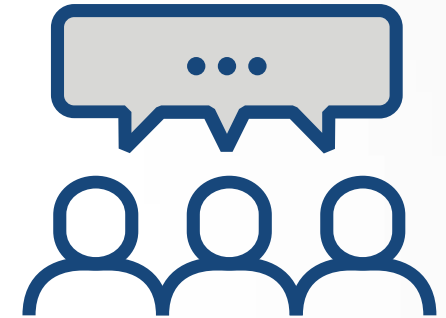
Expedited approval may be needed

Section 3.3.9 PROBLEMS WITH PROCEDURES

Responding to and communication when procedures cannot be performed as documented or when procedures produce an unintended result

Should have component to:

Respond, address concern, and communicate resolution



Good practice might include:

stopping or pausing activity

determining from where problem stems

engaging appropriate individuals

consider risks from solution

All above should incorporate feedback loops

Section 3.3.9 PROBLEMS WITH PROCEDURES (cont'd)

Regarding problem responses

- Users should feel confident
 - concerns are communicated and addressed
 - those affected are aware
- Companies need clear and reliable method for
 - communicating concerns; receiving feedback
- Methods may include:
 - documenting concerns
 - recognizing to the user that concern has been documented
 - providing written feedback to user who raised concern regarding resolution



Section 3.3.10 USER ENGAGEMENT

Engaging procedure users when verifying and validating procedures



User involvement is critical



Users provide valuable information



Engage users

as early as possible

with varying degrees of experience and
from multiple facilities

for verification and validation

Section 3.3.11 DEFICIENCIES AND IMPROVEMENT OPPORTUNITIES

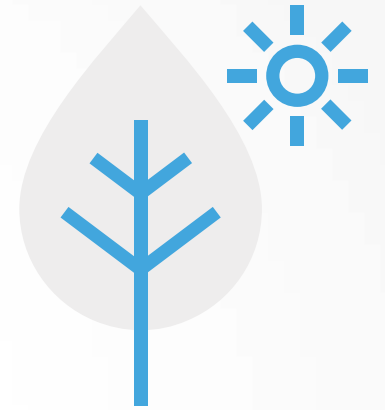
Resolving identified deficiencies and improvement opportunities in procedures, including those identified from internal and external learnings

- Undergo constant scrutiny
- Reporting deficiencies and improvement opportunities
- Minimize the gap between work as imagined versus work as done
- Respond to and resolving deficiencies to gain User trust and confidence
- After-action reviews
- Assess emerging risk



Section 3.3.12 MANAGING CHANGES TO PROCEDURES

Managing changes to procedures



- Periodic review under a document control system
- Changes in activity or task may prompt a formal management of change.
- Three types of changes:
 - Technical
 - Organizational
 - Administrative
- Mergers and acquisitions
- Good practice: notify users when procedure is undergoing revision



Join Us!

COS Annual Forum

November 10-12

Registration Information: www.centerforoffshoresafety.org

- Spotlights on Excellence – finalists for the 2020 COS Safety Leadership Award
- Conversations with BSEE and USCG
- API RP 75 4th Edition
- Process Safety
- Breakout sessions
 - SEMS Maturity
 - Mechanical Lifting
 - Life Boats
 - COVID

Questions & Answers



Participants in Development of the Good Practice

Sarah Acton, Baker Hughes	Jack Gilbert, Halliburton	Curt Johnson, COS	Ajay Shah, Chevron
Frank Adamek, Adamek Engineering	Phil Grossweiler, M&H	Rick Keen, Danos	Albert Skiba, OPITO
Brady Austin, Consultant	Leonard Hale, Gulf Copper	Ben Marguglio, ASQ	Brad Smolen, BP
Michael Batiste, Schlumberger	Brandy Harrington, COS	Miles Montegut, BHP	Terrance Sookdeo, Baker Hughes
Christine Cobb, ExxonMobil	Joseph Hart, USCG	Jeramy Montgomery, Rowan	Richard Stafford, GP Strategies Corp
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Cameron Craig, Pacific	Eileen Hughes, BHP	Chris Muzzy, MSRC	Russell Turner, Baker Hughes
Paul Delgado, BHP	Robert James, Murphy	Camille Peres, Texas A&M University	Jason Vanhaverbeke, ExxonMobil
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