



# AZSPU

## Incident Investigation and Reporting Procedure

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## Incident Investigation and Reporting

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**Incident Investigation and Reporting**

## 1 INTRODUCTION

### 1.1 PURPOSE

This document describes the procedures employed for reporting and investigating incidents related to BP activities in the Azerbaijan Strategic Performance Unit (AzSPU) and in the preparation of associated reports.

**Note:** The prime objectives of such an investigation are to establish the immediate and root causes, analyze them, and make recommendations to prevent recurrence of a similar incident. It is not to attribute blame.

### 1.2 SCOPE

This process shall be used for all types of incidents, including but not limited to:

- Fatalities
- Workplace injuries and illness
- Security breaches
- Spills and leaks
- Vehicle accidents
- Near misses
- All drilling and well operations safety and integrity management accidents, incidents and significant near misses
- Process safety incidents e.g. overpressure of design plant, excursion from design temperature, formation of hydrate plugs, misdirection of process fluids, ESD or pressure safety valves lifting (whether to flare or vent)
- Plant/technical integrity incidents i.e. any incident where the root cause would be addressed by the Group Defined Practice - Integrity Management (GDP 5.0-0001) and there is actual or potential harm to people or the environment, including loss of primary containment or failure of an engineered system
- Marine related incidents
- Aviation related incident
- Etc.

All types of incidents are to be reported immediately to the supervisor and / or the BP representative.

### 1.3 CONTRACTOR INVESTIGATIONS

Contractor management may wish to conduct a separate internal incident investigation for serious incidents involving contractor employees. BP policy is to respect the wishes of contractors, and to encourage completion of a joint investigation in a cooperative manner with representatives of both BP and affected contractors.

For incidents that occur at BP controlled sites or activities the investigation shall be led by a BP representative.

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## 2 RESPONSIBILITIES

### 2.1 ALL PERSONNEL

Any person involved in or observing an accident or near miss must immediately report it to his / her supervisor or BP Representative.

### 2.2 SPU LEADER (SPUL)

SPU Leader is responsible and accountable for ensuring that this procedure is implemented in the AzSPU and for reporting major incidents and HiPos to the BP Group.

SPU Leader is responsible for

- Notification of Major Incidents and HiPos to the appropriate Group Vice President through personal conversation within 8 hours
- Issue of MIA/HiPo notification to “G E&P Incident Notification” distribution list
- Being the “owner” of all major incidents in AzSPU (other than fatality incidents, which require an externally led incident investigation team).

### 2.3 FUNCTIONAL VICE PRESIDENTS (VPS) OR DESIGNEE (OPERATIONS, MIDSTREAM, D&C, HSE & ENGINEERING)

Vice President (VP) or designee is responsible and accountable for:

- Ensuring that this procedure is implemented in their area of responsibility
- Reporting MIA/HiPo/DAFWC incidents to SPU leader
- Being the owner of HiPo incidents in their respective Function.

### 2.4 AREA/WELL/LOGISTIC OPERATIONS MANAGER

Responsible for:

- Ensuring that this procedure is implemented in their specific area of responsibility
- Reporting level G (health & safety) and all F+ incidents to the relevant VP
- Being the owner of actual level F severity incidents in their respective area of responsibility.

### 2.5 AZSPU ENTITY AVIATION AUTHORITY

AzSPU Entity Aviation Authority (EAA) is responsible and accountable for:

- Ensuring that this procedure is implemented for all aviation incidents
- Notifying Segment Aviation Authority and Group Head of Aviation about aviation incidents and incidents that could require aviation as part of the incident response, taking due consideration of the notification of the AzSPU Incident timing to ensure that the notification does not precede the notification to the Functional VP and Segment Management
- Providing the appropriate aviation expertise and resources to the investigation team

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- Consulting with Segment Aviation Authority and Group Head of Aviation on level of investigation and BP Aviation participation
- Acting as conduit to Segment and Group for promulgating lesson learned on aviation incidents.

## 2.6 MARINE AUTHORITY

The SPU Marine Authority is responsible and accountable for:

- Ensuring that this procedure is implemented for all marine incidents
- Reporting MIA/HiPo/DAFWC marine incidents to Single Point Accountability - Marine
- Ensuring SPA-Marine notifies BP Shipping of the incident, taking due consideration of the notification of the AzSPU Incident timing to ensure that the notification does not precede the notification to the Functional VP and Segment Management
- Providing the appropriate marine resources to the investigation team
- Consulting with BP shipping on level of investigation and BP Shipping participation
- Acting as conduit to BP Shipping for promulgating lesson learned.

## 2.7 SITE MANAGER

Site Manager/OIM/Fleet Operations TL are responsible for estimating the worst **probable** (not imaginable) outcome of a particular incident and making an initial assessment of the severity of the incident and determining the level of management that should own the investigation process. (Refer to Section [2.8](#)).

Site Managers are responsible for:

- Initial reporting of the incident
- Preservation of the incident scene (preservation of physical data and prevention of destruction/alteration) and early collection of material evidence, taking photographs etc
- Making an initial assessment of the severity of an incident
- Requesting drugs and alcohol testing whenever potential for substance abuse is under question
- Obtaining initial witness statements (eyewitnesses) while incident details are still fresh
- Instigating the appropriate investigation process
- Assuming ownership of minor incidents on his site
- Accepting the Incident Report and allocating the resulting actions
- Ensuring that all equipment is verified “fit for purpose” after a significant incident or event, prior to return to service.

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**Note:** The incident scene shall be released for resumption of work only at the direction of the incident investigation team. This shall be done (with advice from BP legal as needed) at the direction of, or with the concurrence of, any involved regulatory or law enforcement bodies.

## 2.8 INCIDENT OWNER

The Owner is the individual who requested the Incident Investigation to be performed and has the responsibility for the investigation through to closeout of the remedial actions. The level of the Owner must be commensurate with the severity, or potential severity, of the incident and should be:

- SPU Leader (SPUL) for major incidents in AzSPU (**all actual** level A-E incidents other than fatality).
- Vice President (VP) for HiPos (**potential** severity A-E).
- Area/Well/Logistics Operations Manager for all **actual** level F severity incidents.
- Site Manager/OIM/Fleet Operations TL **actual or potential** incident severity Levels G-H.

The Owner shall:

- Appoint the Investigation Team, other than for fatality incidents
- Draw up the terms of reference for the investigation
- Ensure that incident investigation team leads and members are given adequate relief from their normal duties to complete the incident investigation
- Ensure investigation team is provided with all resources required for investigation
- Provide a business overview on actions prior to entry into the tracking system and shall review each action item for confidentiality
- Review the selection of the Responsible Party for handling the action items
- Ensure that all new or reassigned action items are entered into the Accident and Incident database (Traction) under the appropriate category
- Review progress reports to ensure that all outstanding action items are being completed within specified deadlines
- Take appropriate action with the Responsible Party if action items are not being completed within the required deadline
- The incident owner shall promptly advise BP Legal of any incidents classified as “Major Incident”, and of any other incident where the possibility of regulatory action or litigation exists.

## 2.9 INVESTIGATOR / INVESTIGATION TEAM

The Investigator/Investigation Team will be appointed by the Investigation Owner (Site Management, Area/Well/Logistics Operations Manager, VP, SPUL) depending on severity of incident, and specifics of the case, and is responsible for:

- Investigating the circumstances leading to the event
- Making recommendations to prevent recurrence
- Ensuring that the written report is completed
- Ensuring the MIA, HiPo and DAFWC report is handed over to the “owner”.



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The Investigation Team shall:

- Establish the situation before the incident
- Determine what happen during the incident
- Determine the critical factors
- Determine the immediate and system causes
- Determine actions to prevent recurrence of a similar incident
- Produce the incident report.

**Note:** Wherever the location of the incident, the investigation team shall not investigate in circumstances where it may be unsafe to do so. It shall be the responsibility of the **investigation team leader** (with help from the BP entity leader as requested) to ensure the safety of the investigation team members during the investigation.

## 2.10 APPROVER

The Approver of the incident report will normally be the “Owner” of the incident and he/she is responsible for agreeing actions with the Investigation Team. If the Owner is not satisfied that the actions recommended fully address the immediate and system causes of the incident, he should instruct the Investigation Team to seek further advice and formulate further actions before he approves the incident report and actions in Traction.

The Approver is responsible for assuring the quality of the investigation report and the data entered into the Accident and Incident Reporting database (Traction).

The Approver shall:

- Review the Incident Report to ensure an accurate document with proper root cause analysis
- Ensure that:
  - appropriate causes have been identified
  - action items will effectively mitigate the hazards
  - action items are clear and provide the Responsible Party with adequate details to implement the action item
- Review the selection of the Responsible Party for handling the action item in order to ensure that the action item has been assigned to an individual or job position with sufficient authority and expertise to complete the action
- Approve the report in the Accident and Incident database (Traction).

## 2.11 INCIDENT REPORT ORIGINATOR

The Incident Report Originator is responsible for entering the Incident Report into the Accident and Incident database (Traction).

**Note:** This will normally be a nominated Traction operator at the site of the incident.

**Incident Investigation and Reporting****2.12 RESPONSIBLE PARTY**

The Responsible Party is the individual who has been assigned an action item arising from an Owner's Incident Investigation. The Responsible Party must have sufficient authority and expertise to carry out the action.

The Responsible Party shall:

- Review validity of assignments of an action item with the Owner, if and when they consider the assignment inappropriate
- Take accountability for ensuring that all of his/her action items are completed by the target date
- Take appropriate action with the Owner if the action items are not being completed within the desired deadline
- Ensure that all comments against their action items, updates of the status of their action items and closure of their action items when completed are entered into the Traction database
- Ensure actions are approved by the Owner and are closed in Traction.

**2.13 HEALTH AND SAFETY MANAGERS (OFFSHORE, MIDSTREAM)**

Responsible for:

- Providing support to Incident Owners in setting up the Investigation Team.

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### 3 RECORDING AND CLASSIFYING INCIDENTS

#### 3.1 REPORTING OF INCIDENTS IN RECORDING SYSTEMS

BP Group has minimum timeframe requirements for incident reporting into appropriate recording system. These requirements are summarized in Table 4.1 below.

**Table 4.1.** Requirements for entering incidents into Traction and MIA/HiPo database

Type of Incident	Recording Timescale	Recording System
Major Incidents (MIAs) Levels A-E	<24 hours	MIA/HiPo database
	<5 days	Traction
High Potential Incidents (HiPos)	<24 hours or on identification	MIA/HiPo database
	<5 days	Traction
Any BP Employee Fatality in the BP Work Related Boundary	<24 hours	MIA/HiPo database
	<5 days	Traction
Any BP Contractor Fatality in the BP Work Related Boundary	<24 hours	MIA/HiPo database
	<5 days	Traction
Any Third Party Fatality in the BP Operated boundary	<24 hours	MIA/HiPo database
	<5 days	Traction
Any non work-related Fatality in the BP Operated boundary	<24 hours	MIA/HiPo database
	<5 days	Traction
Loss of Primary Containment (LOPC)	<5 days	Traction
Security incidents	<5 days	Traction
Day Away from Work Case-Employee	<5 days	Traction
Day Away from Work Case-Contractor	<5 days	Traction
Restricted Work/Job Transfer-Employee	<5 days	Traction
Restricted Work/Job Transfer-Contractor	<5 days	Traction
Medical Treatment-Employee	<5 days	Traction
Medical Treatment-Contractor	<5 days	Traction
Loss of consciousness	<5 days	Traction
A significant injury or illness diagnosed by a physician or other licensed health professional, such as cancer, chronic irreversible disease, fractured or cracked bone, or punctured eardrum	<5 days	Traction
Needlestick and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material	<5 days	Traction
Medical removal under Government standards	<5 days	Traction
Occupational hearing loss (current hearing test must show 10dBA shift from current baseline and total cumulative hearing loss must be 25dBA or move above audiometric zero).	<5 days	Traction
Vehicle Accidents-Employee	<5 days	Traction
Vehicle Accidents-Contractor	<5 days	Traction
Spills $\geq$ 1 bbl	<5 days	Traction
Uncontrolled Releases/Events	<5 days	Traction
Fires	<5 days	Traction
Explosions	<5 days	Traction

MIA/HiPo database is located at: <http://miahipo.bpweb.bp.com>

**Note:** If there is any doubt as to whether an incident is within the reporting boundaries of this procedure it shall be initially reported based on the assumption that it is.

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**Note:** The incident should not be recorded in the Traction system if information is classified as ‘BP Confidential’ of higher under the [BP Global Information Handling Standard](#).

**Note:** Fraud incidents are not reported through Traction, but should be reported in line with [BP's Fraud Reporting Instruction](#) and the local BP entity leader shall notify the local financial controller or the relevant Segment / Function chief financial officer.

All other type of security incidents should be recorded in the [Traction](#) system.

### 3.2 CLASSIFICATION OF INCIDENT

The Incident Owner shall be accountable for the accuracy of the submitted data, including classifications.

Incidents and unsafe/unhealthy conditions which are entered into Traction shall be:

- Classified for incident actual severity in accordance with [Appendix D-E](#).
- Classified for incident potential severity in accordance with [Appendix D-E](#), and taking into account [Figure 6.1](#).
- Loss of Primary Containment (LOPC) incidents that involve an acute release shall be initially classified for potential severity in accordance with [Appendix F-G](#), based on the type of substance. This shall establish the minimum potential severity for recording or notification purposes. [Appendix D-E](#) shall then be used to determine if the potential severity classification should be higher based on the actual circumstances of the incident.
- When the incident severity appears border-line between two levels, initially, the more severe level shall be chosen. Where tools and calculations are used, the information provided in conjunction with sound judgment and common sense shall be used to support the decision.

When an initial recording of severity level is later revised due to additional or new information, the Incident Owner shall review the new severity classification. Incident Owner shall also ensure that the appropriate record within the designated HSSE information system is updated, and applicable local or Group notification is made.

[Appendix J](#) shall apply to resolution of requests for clarification from BP group regarding the recordability or classification of incidents or unsafe / unhealthy conditions.

**Note:** When entering MIA/HiPo and RI (recordable injury) incidents into Traction it is mandatory to classify the incident as being related to either:

- Process Safety
- Integrity Management
- Security
- Control of Work
- Driving
- Marine.

Process Safety Incident Classification Guidance is provided in [Appendix M](#).

For every incident the Safety Specialists/TA Team located in the Health and Safety Organization Offshore (Safety Specialists/TA Team Leader or HSE Incident Investigation Specialist) has to be informed and consulted to ensure that the selected category is correct.

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Additionally the LL One Pager report format ([AZSPU-HSSE-DOC-00054-A2](#)) has been updated to include mandatory indication of incident relatedness to the above categories.

## **4 TRAINING REQUIREMENTS AND COMPETENCE**

### **4.1 INVESTIGATION TEAM LEADERS**

Incident Investigation Team Leaders are considered “trained” upon completion of a standardized 12 hour “Basic RCA” training program that instils basic level competency for Root Cause Analysis.

The training on its own doesn’t prove competence, therefore the severity of the incident and the person’s previous experience in leading investigations shall be considered by the Incident Owner before nominating the person to act as Investigation Team Leader. Incident Investigation Team Leaders called on to investigate fatality incidents should receive “Incident Manager” training provided by Group Safety Advisor - incident investigation.

Untrained people should not lead RCA investigation.

### **4.2 ROOT CAUSE SPECIALISTS (RCS)**

Root Cause Specialists are considered “trained” upon completion of a standardized 12 hour “Basic RCA” training program that instils basic level competency for Root Cause Analysis. The severity of the incident and person’s previous experience should be considered by the Incident Owner before the person is nominated to act as Root Cause Specialist.

### **4.3 MASTER ROOT CAUSE SPECIALIST (MRCS)**

Major Incidents (level A-E) and HiPOs will require that at least one incident team member is trained to Master Root Cause Specialist level. The person is considered “trained” upon completion of a 3 day “Master RCA” training program. The master-level incident investigator is the local centre of expertise that can train, coach, and mentor incident investigation team leads trained at a lower competency level. There should be at least one person trained to Master Root Cause Specialists level within AzSPU who shall be available to facilitate level A-E severity incidents.

### **4.4 TEAM MEMBERS**

Although there is no formal requirement for Investigation Team Members (other than Team Leader and RCS) to attend above mentioned trainings, it is desirable for them to attend the standard 12 hours “Basic RCA” training program.

Certain incidents will require Human Factors Analysis (HFA) to be performed. Only trained people shall do this.

**Note:** A pool of trained RCS and MRCS are available in AzSPU. A rotational weekly schedule has been developed with the intention that Incident Owner can select the required MRCS or RCS dependent on the actual or potential severity of the incident. This rotational schedule also ensures further development and application of RCA investigative techniques.

**Incident Investigation and Reporting****5 CORPORATE NOTIFICATION REQUIREMENTS**

The following paragraphs describe incident notification requirements.

**5.1 SPECIFIC RESPONSIBILITIES**

All incidents shall be reported immediately to the appropriate supervisor or line manager and through the line management to the Site Manager/OIM/Fleet Operations TL. For level G incidents (other than H&S) and all level H incidents this requirement is relaxed to 8 hours. The Site Manager/OIM shall ensure that the scene of the incident is made safe and then protected from disturbance.

**5.1.1 Site Manager/OIM/Fleet Operations TL**

Site Manager/OIM/Fleet Operations TL is responsible for notification of all incidents to Area/Well/Logistics Operations Manager under following notification timetable:

- Any MIA, HiPo or DAFWC (Level F – Health and Safety), immediate verbal notification
- All Level F (other than Level F - H&S) and Level G incidents at the earliest opportunity, but within 8 hours
- All Level H incidents at the earliest opportunity, but within 24 hours

For MIAs, HiPOs, injury/illness incidents, and production loss events Site Manager / OIM / Fleet Operations TL must use the 'Initial Internal Incident Notification Form' to assist with verbal notification (see Appendix K)

For drilling related incidents the OIM shall notify the Well Operations Manager and make the Area Operations Manager aware of the incident. The Well Operations Manager will determine the level of investigation required.

In addition to their line notification responsibilities the Fleet Operations TL for Marine Related Incidents shall notify the AzSPU Marine Authority taking due consideration of the notification timetable.

**5.1.2 Area/Well/Logistics Operations Manager/Marine Authority**

Area/Well/Logistics Operations Manager is responsible for incident notification to relevant VP under following notification timetable:

- Any MIA or HiPo incidents, immediate verbal notification.
- Level F - H&S incidents at the earliest opportunity, but within 8 hours.
- Any F (other than H&S) and Level G – H&S incidents at the earliest opportunity, but within 24 hours.

The Area/Well/Logistics Operations Manager should exercise their best judgment whether further notification is required for all other incidents.

For Marine Related Incidents the Marine Authority shall notify the AzSPU Single Point Accountability -Marine.

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Logistics Manager in role as AzSPU EPRA (Entity Person Responsible for Aviation) shall additionally to his line management notify AzSPU Entity Aviation Authority (EAA) of any aviation incidents and incidents that could require aviation as part of the incident response.

#### 5.1.3 Vice President (VP)

The VP is responsible for incident notification to Strategic Performance Unit Leader (SPUL) under following notification timetable:

- Any MIA and HiPo incidents, immediate verbal notification
- All Level F – H&S incidents (including DAFWC) at the earliest opportunity, but within 24 hours.

The VP should exercise their best judgment whether further notification is required for all other incidents.

The Single Point Accountability – Marine shall coordinate and effect the notifications of Marine or Marine Related incidents to the Group Marine Authority and BP Shipping taking due consideration of the AzSPU incident notification timing to ensure that the notification does not precede the notification to the GVP and Segment Management.

**Note:** All Level A-E marine incident investigations shall be brought to the attention of BP group marine authority.

#### 5.1.4 Strategic Performance Unit Leader (SPUL)

The SPUL shall verbally notify the Group Vice President of MIA and HiPo incidents at the earliest opportunity but within 8 hours.

The initial verbal MIA and HiPo notification shall be confirmed with global e-mail notification within 24 hours using the Major Incident /HIPO announcement proformas ([AZSPU-HSSE-DOC-00054-A7](#)). The SPUL should exercise their best judgment whether further notification is required for Level F - H&S incidents.

**Note:** The SPUL shall verbally notify TVP Ops, HSE, Engineering of any BIL (BOTAS International Limited) MIA/HiPo incidents at the earliest opportunity but within 8 hours.

The initial verbal notification shall be confirmed with email notification to “G E&P Non-Op Incident Notification” within 24 hours by using the Major Incident /HIPO announcement proformas ([AZSPU-HSSE-DOC-00054-A7](#)).

#### 5.1.5 Incident Notification Details

The notifications should provide the following information:

- Type of occurrence (fire, explosion, injury, spill, etc)
- Site / location
- Date and time of incident
- Brief description of the event
- Actual severity (Level A-H)



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- Incident category, i.e. injury details, damage or oil / chemical spilled, whichever relevant
- Immediate corrective action taken to prevent further loss
- Contact name (person supplying information) and telephone number.

## 5.2 Incident Notification Flowchart

Summarizing the above, Figure 5.1 describes the AzSPU incident notification flowchart.

**Figure 5-1 Incident Notification Flowchart**

If observe the incident report to →	Immediate Supervisor	OIM/Site Manager/ Fleet Ops TL	Area/Well/ Logistics Operations Manager	Vice President and AzSPU Incident Notification mailbox "G EUBAK MIA/HIPO Notification"	SPUL	GVP and Segment Requirements (Verbal)	Global email Notification List "G E&P Incident Notification"	TVP Ops, HSE, Engineering (Verbal)*	Email Notification List "G E&P Non-Op Incident Notification"
Major Incident (MIA) Levels A-D	Red	Red	Red	Red	Red	Yellow	Green		
High Potential Incident (HiPo) Levels A-E	Red	Red	Red	Red	Red	Yellow	Green		
Any BP Employee Fatality in the BP Work Related Boundary	Red	Red	Red	Red	Red	Yellow	Green		
Any BP Contractor Fatality in the BP Work Related Boundary	Red	Red	Red	Red	Red	Yellow	Green		
Any Third Party Fatality in the BP Operated boundary	Red	Red	Red	Red	Red	Yellow	Green		
Any non work-related Fatality in the BP Operated boundary	Red	Red	Red	Red	Red	Yellow	Green		
BIL MIA/HiPo incidents	Red	Red	Red	Red	Red			Yellow	Green
Level F (Health and Safety, including DAFWC)	Red	Red	Red	Yellow	Green	Best Judgment			
Level F (Others)	Red	Red	Yellow	Green	Best Judgment				
Level G (Health and Safety)	Red	Red	Yellow	Green	Best Judgment				
Level G (Others)	Red	Yellow	Yellow	Best Judgment					
Level H and Near Misses	Red	Yellow	Green	Best Judgment					

*TVP is a part of "G E&P Incident Notification" distribution list.*



Immediately



Within 8 hours



Within 24 hours

**Note 1:** Figure 5-1 specifies the minimum incident notification requirements which must be followed at all times, however more stringent notification requirements may be exercised if deemed necessary.



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**Note 2:** All Major incidents (A-E levels), HiPos and certain security sensitive incidents (e.g. illegal taps) shall initially be sent to “G EUBAK MIA/HiPo Notification”, and shall not be distributed any further without prior SPUL agreement. Distribution of MIA and HiPo LL One-Pager Reports and HiPlus’s outside AzSPU must be from SPUL office, not from individual Operating Areas / Facilities.

**Note 3:** All F-H severity incidents (excluding HiPos and security sensitive incidents) should be distributed accordingly to “G EUBAK AzSPU incidents\_offshore” for offshore incidents and to “G EUBAK AzSPU incidents\_onshore” for onshore incidents.

**Note 4:** More details on Illegal Tap Incident Notification requirements for Exports PU are described in Appendix H.

**Note 5:** Details on external notification requirements for Onshore Operations can be found in Appendix I.

**Note 6:** For external notification of material release to the environment the AzSPU Internal & External Material Release Reporting & Notification Procedure ([AZSPU-HSSE-DOC-00075-2](#)) shall be followed.

**Note 7:** If for any reason any line position is unavailable (e.g. vacation, unreachable) their delegate shall assume full responsibility to continue the line notification process.

**Note 8:** Notifications of Marine or Marine Related Incidents to E&P Segment Marine Authority and BP Shipping will be coordinated and effected by the AzSPU Single Point Accountability - Marine taking due consideration of the notification of the AzSPU Incident timing to ensure that the notification does not precede the notification to the GVP and Segment Management

**Note 9:** For a major security or HiPo security incident that may not be in the public domain, the SPUL shall privately and securely if possible, communicate with the relevant segment or function designated executive line management, regional security advisor and group head of S&O. The regional security advisor shall inform additional senior leadership on a need-to-know basis or based on who can advise or help. The notification chart in [Figure 5.1](#) shall be used.

**Note 10:** For drilling related incidents the OIM shall notify the Well Operations Manager and make the Area Operations Manager aware of the incident. The Well Operations Manager will determine the level of investigation required.

**Note 11:** SPUL, who has reason to believe that a fatality is either the result of natural causes or is self-inflicted, shall consult with the BP regional health director for a preliminary cause decision.

If the BP regional health director agrees that the fatality appears to be the result of a natural cause or is self-inflicted, BP group notification shall not be required. If further investigation provides new information that the fatality is not the result of natural causes or self-inflicted, then the notification chart in [Figure 5.1](#) shall be used.

If consultation with the BP regional health director is not possible, the BP leader shall comply with the notification requirements in [Figure 5.1](#).

If the fatality is classified as a natural cause or is self-inflicted, but circumstances associated with the incident could have other potential consequences resulting in a potential severity

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level A-D or E classification (e.g., driver, crane operator, or another critical role), then notification requirements in [Figure 5.1](#) apply.

## 6 THE INVESTIGATION PROCESS

### 6.1 DETERMINING INCIDENT SEVERITY

The processes used to investigate an incident always follow the same principles. However, the make up of the Investigation Team, and the investigation process followed, is determined by the actual and potential severity of the incident and specifics of the case. For guidelines on the level of investigation and investigation team make up [AZSPU-HSSE-DOC-00054-A3](#) should be referred to.

If an incident has different types of HSSE and business impacts the most stringent investigation requirements apply. For instance, an incident with classification level A for environment and level H for health, safety and security is investigated using level A requirements.

### 6.2 DEVIATION FROM INVESTIGATION PROCESS

The relevant VP accountable for the area of operation where the incident occurs shall request the segment or group head of HSSE for approval of any exceptions from the requirements of [AZSPU-HSSE-DOC-00054-A3](#). The relevant VP may request an exception for an incident that appears to be a special case for the following reasons:

- The location of the incident.
- The nature of BP's relationship to the incident (e.g. the involvement of other parties).
- The nature of other investigations taking place, or the possibility of a joint investigation with a governmental authority or other parties.
- The potential for litigation or regulatory action.

When an exception is requested, the relevant head of HSSE shall determine whether to conduct an investigation, and if so, when and how to do so. If an exception is approved, the decision of the segment or function head of HSSE as to whether, when and how to investigate the incident shall replace the requirements of this practice for that specific incident. The relevant head of HSSE shall inform the group safety adviser-incident investigation of any exceptions for incidents at level A-E.

When relevant VP requests an exception for levels A-E, the segment head of HSSE (or functional equivalent) should consult BP legal and / or other relevant functions (e.g., security).

The first stage of the process is therefore to make an estimate of the most serious **probable** outcome of the incident in order to determine the process to be followed. This will initially be done by the Site/Wells Manager/OIM.

**Note:** Potential Incident severity is based upon the most serious **probable** outcome. For example:

If a man cuts his finger with a knife, the most likely outcome of the incident is a cut finger and the potential severity of the incident should be judged on that basis


**but...**

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If a man cuts his finger on a power saw, the most serious probable outcome could easily have been an amputation and the potential severity of the incident is therefore judged to be much greater.

Additionally the **Figure 6.1** below can assist in assessment of the potential severity of incident.

**Figure 6.1 - Guidelines to Assess Potential Severity**

Assessment of Potential Severity	
<p><b>Intent:</b> To ensure that the potential severity classification of an incident or unsafe/unhealthy condition is based on the most serious probable outcome.</p> <p><b>Ask:</b> Under different circumstances, could the consequence of the incident or unsafe/unhealthy condition have been more serious for the:</p> <ul style="list-style-type: none"> <li>• Health, safety and security of people and the environment?</li> <li>• Equipment (e.g., damage)?</li> <li>• Privilege to operate?</li> </ul> <p>Different circumstances include but are not limited to:</p> <ul style="list-style-type: none"> <li>• Time of day.</li> <li>• Weather (e.g., wind direction or strength).</li> <li>• Presence or absence of people going about their normal routine/business.</li> <li>• Exceptional intervention of people.</li> <li>• Similar activity with similar controls carried out by the same operation elsewhere.</li> <li>• A source of ignition could have been present, even if the likelihood is low.</li> <li>• If someone or equipment was struck with enough energy to injure an individual or damage/break the equipment, even if the event was minor.</li> </ul> <p>Consult the HSSE team for advice if the probable serious outcome / consequence seem extremely unlikely. For example, a wasp sting can occasionally be fatal for someone allergic to wasp stings, but a first-aid case is a much more foreseeable consequence.</p>	

### 6.2.1 Major Incident (Definition)

A major incident is an incident, including a security incident, involving any one of the following:

- 1 or more fatalities associated with BP operations
- 10 or more injuries or health effects to BP workforce, either permanent or requiring hospital treatment for more than 24 hours
- Significant adverse reaction from authorities, media, NGOs or the general public
- Costs from accidental equipment and property damage equal to or exceeding US \$ 1 Million
- Environmental Impact with A-E severity level.

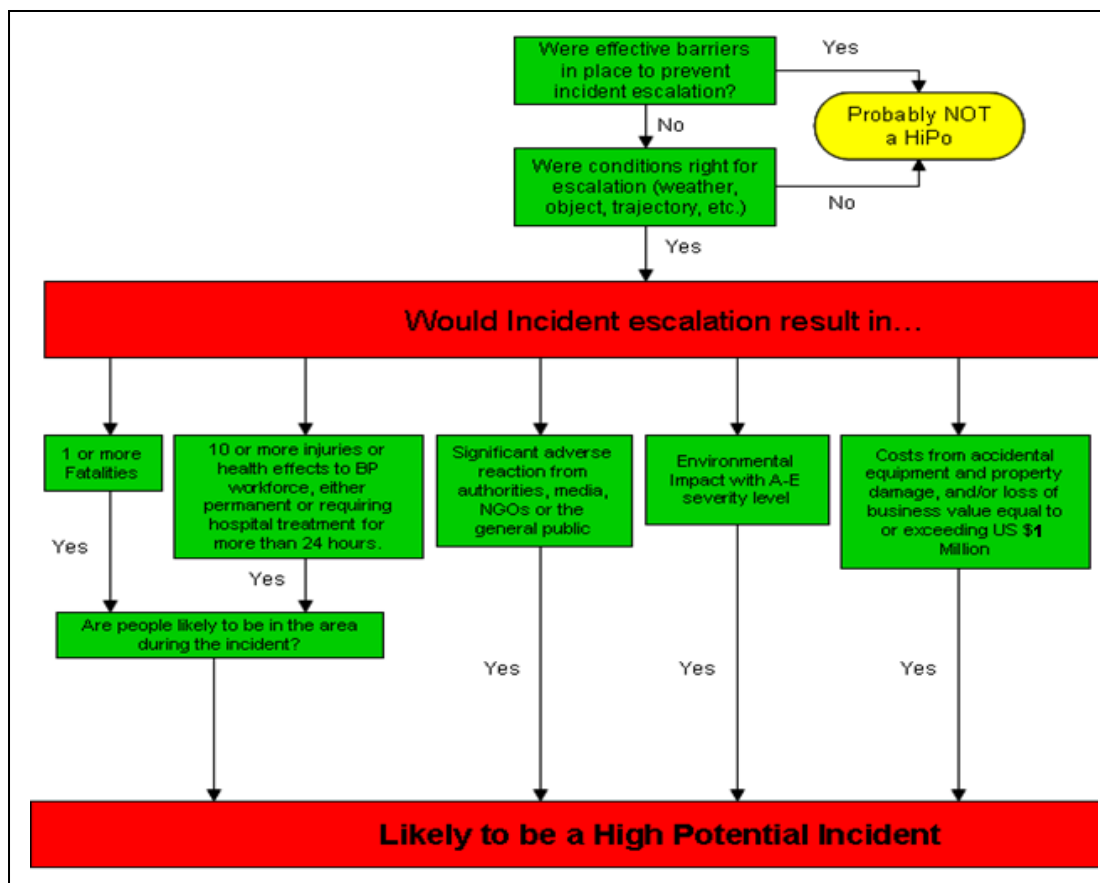
### 6.2.2 High Potential Incident (HiPo) Determination

A High Potential Incident (HiPo) is an Incident or Unsafe/Unhealthy Condition or near miss, including a security incident, where the most serious probable outcome is a Major Incident. In addition, this includes any Loss of Primary Containment (LOPC) Incident where the potential severity is classified at Level E or greater as defined in the Group-Defined Practice 'Reporting of HSSE and Operational Incidents' (GDP 4.4-0001).

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**Figure 6-2** facilitates the process of decision making while determining the HiPo relevance of the incident. A HiPo may not be identified as such at the time of the incident and it may only be after the investigation that true the severity of the probable outcome becomes clear. If, after investigation, an incident is found to fit these definitions, it should be reported as a HiPo, even if it is outside the nominated reporting timeframe, or does not explicitly meet these definitions. This requires a HiPo to be posted in the MIA/HiPo Database system and the severity in the Traction Potential Risk Matrix to be increased to level A-E.

**Figure 6-2 - HiPo Incident Determination Flowchart**



See the guidance on “use of DROPS Calculator” and on “Dropped Object HiPo determination” at [Appendix L](#) of this document.

### 6.3 TRACTION

Traction is a software tool designed to provide a single data entry system for all Health, Safety, Environmental, Property Damage, Security, Reputation and Business Interruption/Unit Outage incidents. Traction also offers an actual and potential severity matrix that allows the user to assess the incident severity on a consistent basis.

### 6.4 ESTABLISH INVESTIGATION TEAM

The Investigation Team is appointed by the Investigation Owner.

The Owner initiates the RCA investigation by agreeing with and issuing “Terms of Reference” to the Investigation Team Leader.

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## 6.5 TERMS OF REFERENCE

Terms of Reference detail the requirements of the investigation and give official status to the investigation. In particular they will:

- Identify references
- Define the scope of work
- List the team members
- Provide objectives/guidance
- Indicate any requirements for intermediate reporting.

**Note:** The investigation shall remain strictly within the Terms of Reference and deviate from them only after discussion with the Owner. A model Terms of Reference template is provided in [Appendix A](#).

Copies of the Terms of Reference shall be provided to the Investigation Team and the Site Manager.

The Team Leader of the Investigating Team shall discuss the Terms of Reference with the Owner to ensure that he is fully briefed.

## 6.6 TEAM SELECTION

Incident investigation teams are determined according to the type of incident. Generally, the team will consist of the following:

- A member designated as the Investigation Team Leader with seniority dependent on severity of the incident
- At least one person knowledgeable in the process involved, e.g. operations or technical engineer
- A contract employee, contractor management representative, and / or HSE representative if the incident involved the work of a contractor
- A person knowledgeable in incident investigation techniques and system cause analysis – Root Cause Specialist
- Other persons, as needed, with appropriate knowledge and experience to thoroughly investigate and analyze the incident, i.e. may include persons from other facilities or within the industry as a third party representative in major investigations.

**Note:** People directly or indirectly involved in an incident A-E shall not be selected as members of the incident investigation team.

**Note:** BP legal should be consulted on the arrangements for appointing any person from outside BP (e.g., someone with a relevant area of expertise) to participate in the investigation, whether as a team member or as a provider of expert opinion.

**Note:** Fatality incidents will require an externally led incident investigation team, with a member of Group Leadership as a Team Leader trained as “Investigation Manager” and a master level root cause specialist coming from outside AzSPU. BP’s RCA Investigation process shall be used.

All other non-fatality Major Incident (Level A-E) shall have a MRCS on the team.

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Safety related HiPo investigations shall be led by, or have a member of the team, that has been trained as a MRCS or 'basic' RCA, depending on the complexity of the investigation. BP's RCA Investigation process shall be used. The investigation may be internally led.

Level F (Health&Safety) incidents shall use BP's RCA Investigation process.

If a HiPo is not a safety related HiPo, then the actual severity will determine the required level of investigation.

Only people trained in basic RCA or MRCS shall use Comprehensive List of Causes (CLC) techniques in RCA investigations.

An incident investigation team assigned to investigate a level A-F security incident shall include a security professional nominated or approved by the group head of Security.

The further guidance on required level of investigation and investigation team make up can be found at [AZSPU-HSSE-DOC-00054-A3](#).

All team members shall be mobilized within 48 hours of the incident.

## 6.7 CONDUCTING THE INVESTIGATION

The Team Leader is responsible for managing the investigation.

### 6.7.1 Scope and Objectives

The investigation shall:

- Establish the facts surrounding the incident
- Review the application of management systems and management practices and their impact
- Identify critical factors, immediate and system causes and make recommendations to prevent recurrence.

## 6.8 FACT FINDING

Information on the incident can be obtained by collecting information from people, positions, parts and papers – PPPP technique.

Interviews with witnesses shall be carried out as soon as possible after the incident; while the incident is fresh in their minds and before too much discussion has taken place with their colleagues.

Witnesses should be interviewed individually, so that they are not interrupted or questioned by others involved. One member of the team should interview the witness and a second record the interview. The interviewee must sign interview transcripts.

To ensure that all facts are uncovered, ask the broad "who, what, where, when, why and how" open-ended questions.



**Incident Investigation and Reporting****6.9 ESTABLISH THE SEQUENCE OF EVENTS**

As the investigation progresses, the investigators should begin to identify the sequence of events and concentrate efforts on increasing their knowledge in areas of uncertainty.

As the extent of physical factors involved in an incident becomes clear, the investigators should shift the emphasis of their investigation and questioning to the system causes and the reasons for people's actions.

Establish a chronology of events by date, time and place. The construction of a diagram showing the connections between the various events and conditions leading up to the incident, called Sequence of Events or timeline, is a useful technique in the investigation process, especially for more complex incidents.

**6.10 ESTABLISH AND ANALYZE FINDINGS**

The findings of the investigation should establish the immediate and system causes of the incident so that corrective measures can be taken to prevent future incidents.

**6.10.1 Identify Critical Factors and Causes and Make Recommendations**

The investigation process shall identify actions to prevent recurrence. This is achieved by addressing the substandard acts and conditions and by identifying and correcting the latent failures.

Not all causes can be completely eliminated and some may be eliminated only at prohibitive cost. Some recommendations will, therefore, be focused on reducing the risk to a tolerable level, while others will be focused on improving protective systems (the defenses) to limit the consequences.

At least one recommendation should be made for each finding.

Actions shall be ranked for order or priority as follows.

1. Requires immediate action before activity at the site resumes.
2. Must be completed to an agreed plan.
3. Should be considered but not a priority.

**6.10.2 System Cause Analysis**

All incident findings should be reviewed to determine the critical factors, immediate causes and system causes of the incident.

Before starting System Cause Analysis it is important to determine Critical Factors surrounding the incident. Critical Factors are those actions or conditions that, if eliminated would have either prevent the incident from happening or reduce its severity.

Identification of system causes of an incident may often reveal underlying management system failures that resulted in the incident occurring.

System Cause Analysis is a process for analyzing incidents to:

- Provide consistent and repeatable results
- Provide objective and not punitive results
- Provide final results from which system causes can be identified.
- Identify actions which can be taken to correct the cause and prevent a similar type of incident.

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After examining all the critical factors involved in an incident and arriving at the system causes, a good check to use is to ask, "If these system causes were corrected, would this prevent the incident from happening again?" If the answer is no, further evaluation is needed.

### 6.10.3 System Cause Analysis - Example

It is very easy to mistake an immediate cause for a system cause of an incident. As stated above, the system causes of an incident will often be a management system failure. The following example illustrates this point:

*A spill occurred when an employee overflowed a fuel truck while loading it at the bulk fuel loading facility.*

*The initial investigation revealed that the operator of the truck overestimated the amount of fuel required to fill the truck. By the time he realized he was running out of tank capacity, he couldn't reach the shutoff switch before the truck overflowed.*

*The initial finding was that the operator of the fuel truck was inattentive. However further questioning of the driver and a survey of the scene revealed that the truck was being loaded from the top and the emergency shutoff switch for top loading was not functioning properly. This required the operator to climb down off of the truck and to enter the pump room to shut off the flow of fuel. The malfunctioning switch had been reported several weeks prior to the incident but had not yet been repaired.*

**Note:** One system cause of the incident was subsequently found to be a management system that allowed a critical component of an emergency shutdown system to remain in service while not functioning properly.

After arriving at one of the most obvious causes of the incident, it is important to ask, "Why?" In the case above, asking why the employee overflowed the tank resulted in the identification of the malfunctioning switch, and the need for a system to prioritize work requests so critical safety components are repaired as soon as possible.

The BP Comprehensive List of Causes Chart shall be used to determine system causes for all incident investigations ([AZSPU-HSSE-DOC-00054-A6](#)). A CLC glossary is also available ([AZSPU-HSSE-DOC-00054-A5](#)).

### 6.10.4 Human Factors Analysis (HFA)

HFA is performed to understand why people intentionally or unintentionally behaved as they did and to identify how to change this type of behaviour for another desired behaviour.

To perform HFA two techniques are used: Antecedent - Behaviour - Consequence analysis (ABC Analysis) for intentional behaviour, and Human Error Analysis (HEA) for unintentional behaviour.

It is not suggested that HFA is used in all investigations – rather it should be invoked as required by investigation teams whenever they need a deeper understanding of intentional or unintentional behavioural factors.

HFA should be performed once evidence gathering has been completed and critical factors have been identified and written. It is performed at the beginning of the analysis phase of the investigation and allows the investigator to reach a deeper understanding around why a



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person acted or behaved the way they did, so that the investigator is in the best possible position to recommend appropriate corrective actions.

### 6.11 COMPILE REPORT

**Note:** All Incidents need to be reported through the Traction reporting system. For Major, High Potential and Level F Incidents the RCA Incident Investigation Report must also be completed. Reports must follow the layout described. Incident Investigation Report should be completed within 30 days post HIPO/MIA. In cases when extraordinary circumstances exist which would delay the report, e.g. legal review etc, then adjusted completion target must be agreed with HSE & Engineering VP before 30 days elapses who will communicate this to SPUL, as appropriate.

#### 6.11.1 Report Outline

Investigation Team shall use investigation report format provided by BP for completing RCA investigations.

A blank Investigation Report format with minimum required contents can be found at [AZSPU-HSSE-DOC-00054-A1](#).

A sample completed report of a fictional incident can be found at [AZSPU-HSSE-DOC-00054-A4](#).

**Note:** All formal RCA incident investigations must be marked "draft" or "final". Upon receipt of comments and approval on draft formal RCA incident investigations, a "final" marked report will be issued and "draft" versions will be destroyed. Only the corrective actions from the "final" marked RCA incident investigation report shall be entered into [Traction](#).

### 6.12 NON-CONTRIBUTORY FACTORS

The Team may find deficiencies when investigating an incident, which have no bearing on the incident or outcome. If recorded these must be clearly stated as such in the report.

### 6.13 REVIEW WITH MANAGEMENT

#### 6.13.1 BP Management

All Incident Investigation reports shall be reviewed with management including the incident owner to confirm that the technical aspects are correct and the Terms of Reference have been met.

#### 6.13.2 Contractors

Investigations involving contractor owned / operated worksites or equipment, located on BP operated areas, will be reviewed by BP and contractor management to obtain agreement on the report.

However the essential element is that the report is agreed internally within BP and that management accepts the findings. Preferably these findings will not contradict any contractor investigation however if this does occur then the reasons for the discrepancy should be investigated.

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### 6.13.3 Agree with Owner

The basic causes and actions of all Incident Reports must be agreed with the Owner before the final 'approved' or signed off report is produced. Each action in the recommendations must be assigned to a person accountable for the action, a target date for completion and a risk ranking (priority high/medium/low).

The Owner is responsible for making the actions, required completion date, and risk ranking, known to the person accountable for the action and assuring timely completion.

Incident Owner shall determine which of the proposed corrective actions shall be accepted, which shall be accepted with modification and which shall be rejected. Any changes to proposed corrective actions shall be documented, along with the reasons for those changes, and retained within the business. It is the responsibility of the Incident Owner to review any proposed corrective actions having implications beyond their authority the incident owner shall copy the report to the person(s) who would be able to accept or implement that action.

### 6.14 ACTIONS

Recommended actions must state explicitly what is to be done, when and by whom. Before assigning actions the Responsible Party must be consulted to agree a reasonable timescale for completion to avoid actions going unnecessarily overdue.

Traction contains three possible choice of priority when entering actions - these are listed below with their criteria.

#### 6.14.1 Prioritization

The investigation process shall identify actions to prevent recurrence.

At least one recommendation should be made for each finding. The Investigation Team must consult whatever technical experts it feels may be necessary to determine possible actions.

Actions shall be ranked for order or priority as follows:

- High- Requires immediate action before activity at the site resumes
- Medium - Must be completed to an agreed plan
- Low - Should be considered by the Owner but is not a priority

**Note:** The decision about the establishment of the target dates for the completion of the actions should be made and agreed by the Investigation Team and the Owner (e.g. VP, Site/Installation Management) based on the levels of the priority prior to insertion into Traction system.

#### 6.14.2 Owner

The Owner (as per section 2.8) shall allocate actions to a Responsible Party. The Owner and Responsible Party shall reach an understanding on the scope of the action and the timescale by which it is to be completed.

#### 6.14.3 Responsible Party

The Responsible Party shall ensure that the action is closed out in the Action and Incident Data Base (Traction). An action will not be considered finalized until the database has been updated.

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#### 6.14.4 Close-Out of Actions and use of Traction system

Traction is the system BP uses globally to report all safety related incidents as well as Audits and Other events. Traction is a web based tool that enables BP to fulfill their commitment to openly report, investigate, analyze and document all health, safety, security and environmental incidents. It is expected that all BP reportable incidents that occur during the course of working activities will be entered into Traction.

Each Operating Area shall establish a process for tracking the close out of actions. The Managers directly accountable to the VP shall do this on a monthly basis. The VP shall be notified of the number of overdue actions each month. Actions resulting from Major Incidents, High Potential Incidents, Day Away From Work Cases and significant audits will be tracked to resolution at the SPU level in Traction.

All corrective actions from the final incident investigation report will be included into Traction system for further follow-up and completion.

#### 6.15 INCIDENT REPORT ORIGINATOR

Each Operating Area should appoint Incident Report Originators who will be responsible for entering Incident Reports into the database and closing actions in the database when advised to do so by Responsible Parties.

### 7 REPORT DISTRIBUTION

All RCA incident investigation reports shall as minimum be copied to:

- The Owner
- The Site Manager (if he is not the Owner)
- The Area H&S Team Leader
- Health and Safety Managers (Offshore and Midstream) (Major Incident and HiPo Reports).

**Note:** The investigation team leader shall consult with the security professional team member when determining the distribution list for any report of a security related incident.

### 8 DEVELOPMENT AND DISTRIBUTION OF LESSONS LEARNED

The main objective of carrying out an incident investigation is to identify the causes of incidents and to prevent recurrence. In order to achieve the biggest benefit from the investigation, the lessons learned need to be distributed to other sites where a similar incident might occur.

Two types of documents currently utilised in AzSPU can be used for distributing of lessons learned from accidents and incidents:

- AzSPU Lessons Learned (LL) One-Pager ([AZSPU-HSSE-DOC-00054-A2](#)).
- Safety Flash document.

There is a SPU specific protocol and process timeline established for development and distribution of LL reports, which is as follows:

LL One-Pager must be issued for all work related MIA and HiPo incidents. Although not specifically required, individual Sites may choose to issue LL One-Pager for lesser severity incidents. In any case, LL One-Pager should be developed by the Incident Owner. It is the responsibility of the Incident Owner (Area Ops Manager) to deliver the lessons learned to the

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HSE & Engineering VP, or his delegate, for review and agreement before submitting to SPUL for distribution.

All MIA and HiPo LL One-Pagers must be submitted to SPUL office within 45 days from the incident date. To ensure timely completion and submission of the MIA and HiPo LL One-Pagers to the SPUL office, the Safety Specialists/TA Team located in the Health and Safety Organization Offshore will enter a Traction Item on HSE & Engineering VP upon classification of HIPO or MIA into Traction to expedite LL after **35 days**.

**Note:** In case the MIA or HiPo LL One-Pager cannot be issued within this timeline, then target date must be agreed with SPUL via HSE & Engineering VP.

Distribution of MIA and HiPo LL One-Pagers and HiPlus's outside AzSPU must be from SPUL office, not from individual Operating Areas or Facilities. SPUL will circulate LL One-Pagers to the applicable MIA and HiPo distribution list (**G E&P Incident Notification**).

**Note:** HSE & Engineering will also confirm with Segment HSE VP the HIPO/MIAs for which LL will not be submitted (e.g. non work related fatality).

The SPU Marine Authority is accountable for ensuring marine Lessons learned are issued to BP Shipping.

## 9 STORAGE OF RECORDS

The incident shall be entered into the Traction database.

When a site has access to [Traction](#), the report in the database is sufficient record of the incident.

When a site does not have access to [Traction](#) a copy of the report signed by the Originator and Owner must be retained on the site.

Refer to AzSPU HSSE Record Control Procedure ([AzSPU-HSSE-DOC-00041-2](#)) for additional guidance.

**Note:** Incident investigation documents shall be managed in accordance with the applicable requirements of the [BP Global Information Handling Standard](#).

The incident investigation team shall maintain the confidentiality of the investigation materials and information, control the flow of information regarding the incident investigation and release the information only when they find it prudent or necessary to do so, or where release is required by law.

**Note:** The incident investigation team should consult with the incident owner and the security professional in the case of a security incident if there is any doubt as to the correct classification of a document, under the [BP Global Information Handling Standard](#).

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## 10 HSSE & OPERATIONAL INCIDENT REPORTING BOUNDARIES

### 10.1 REPORTING AND RECORDING BOUNDARIES

This section describes reporting and recording boundaries which are used to determine if the incident is / is not BP reportable.

Table 10.1 below defines the applicable boundary for various types of incident. If an incident is determined to be within a boundary described below, then the applicable reporting and recording requirements apply, noting that an incident may fall into more than one of the incident types.

Where the table states that the “Work-related” boundary applies or the “Operational Boundary” applies, Figure 10.3 provides a flow-chart with supporting definitions and guidance to use in determining whether the incident shall be reported.

**Table 10.1 - Applicable boundary for each type of incident**

Type of incident	Boundary
An incident involving an injury/illness, fatality, or vehicle accident to - BP Employee or - <a href="#">D2D Supervised Contractor</a>	<a href="#">“Work-related”</a> Boundary*
An incident involving an injury/illness, fatality to a BP Contractor (excluding D2D Supervised Contractors)	“Work - related” due to an event or exposure occurring either (i) at a facility or location that is within the <a href="#">“Operational Boundary”</a> or (ii) during <a href="#">“Business Travel - BP Contractor”</a> or (iii) during a flight under a BP <a href="#">“Contract for Aviation Services”</a>
An incident to a BP contractor (excluding D2D Supervised Contractors)	“Work - related” and occurs either (i) at a facility or location that is within the <a href="#">“Operational Boundary”</a> or (ii) during <a href="#">“Business Travel - BP Contractor”</a> or
Security incident	Affects the security of (i) one or more members of BP’s workforce (in their capacity as such) or (ii) BP premises /facilities or (iii) BP operation or project.
Explosion	“Operational Boundary”
Flammable gas release	
Fire	
LOPC includes oil spills	
Any other HSSE / Operational Incident	

### 10.2 “OPERATIONAL BOUNDARY”

An incident is within the “Operational Boundary” if:-

- It occurs at a BP-operated facility (which includes unmanned facilities such as wellheads and pipelines where BP Workforce are not present on a day to day basis, where these are operated by BP) or;

## Incident Investigation and Reporting

- It occurs at a facility operated by a Joint Venture, in respect of which BP has the ability to determine Board-level decisions.
- It occurs at an [“E&P contractor-led site doing material work for BP”](#) or;
- It is an operational incident that occurs at a BP operated site, irrespective of who is operating the equipment or.
- It involves a facility that meets the relevant criteria in section 10.3 below.

Below shown are AzSPU sites that are deemed to be within and outside of BP Operational Boundary.

**Figure 10.2 – BP Operational Boundaries for AzSPU**





<b>Incident Investigation and Reporting</b>
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### 10.3 “OPERATIONAL BOUNDARY” – SPECIAL CASES

For HSSE and operational reporting purposes the following criteria apply:- [“dedicated to BP’s business use”](#)

- Vessels: BP holds the International Safety Management Code Document of Compliance (DOC). For example, BP would not hold the DOC for time chartered vessels, spot chartered vessels, or for vessels that are BP owned but not managed by BP.
- Vehicles/Aircraft/Rail transportation: The facility in question is “dedicated to BP’s business use” (see definitions Appendix B).
- BP-maintained facilities: The incident involves a facility at a non-BP-operated location (such as underground storage at a CoDo or DoDo retail site) and BP is responsible for the maintenance and / or integrity of the facility.
- Service Level Agreements: The incident occurs at a non-BP operated location and involves or is within the scope of a service provided by BP under a Service Level Agreement or similar contractual arrangement.

### 10.4 “WORK- RELATED” BOUNDARY

A BP employee (or D2D supervised contractor) injury or illness is considered work-related (for HSSE Reporting purposes) if an event or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness. Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring in the work environment, unless [exceptions](#) specifically apply.

For a BP employee or D2D Supervised Contractor, the work environment is the establishment and other locations where they are present as a condition of their employment. The work environment includes not only physical locations, but also the equipment or materials used by the employee or D2D supervised contractor during the course of his or her work.

Any other BP contractor injury or illness is “work-related” (for HSSE reporting purposes) if an event or exposure within the boundaries described in the previous table for Contractor injury/illnesses either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness. Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring within these boundaries, unless [exceptions](#) specifically apply.

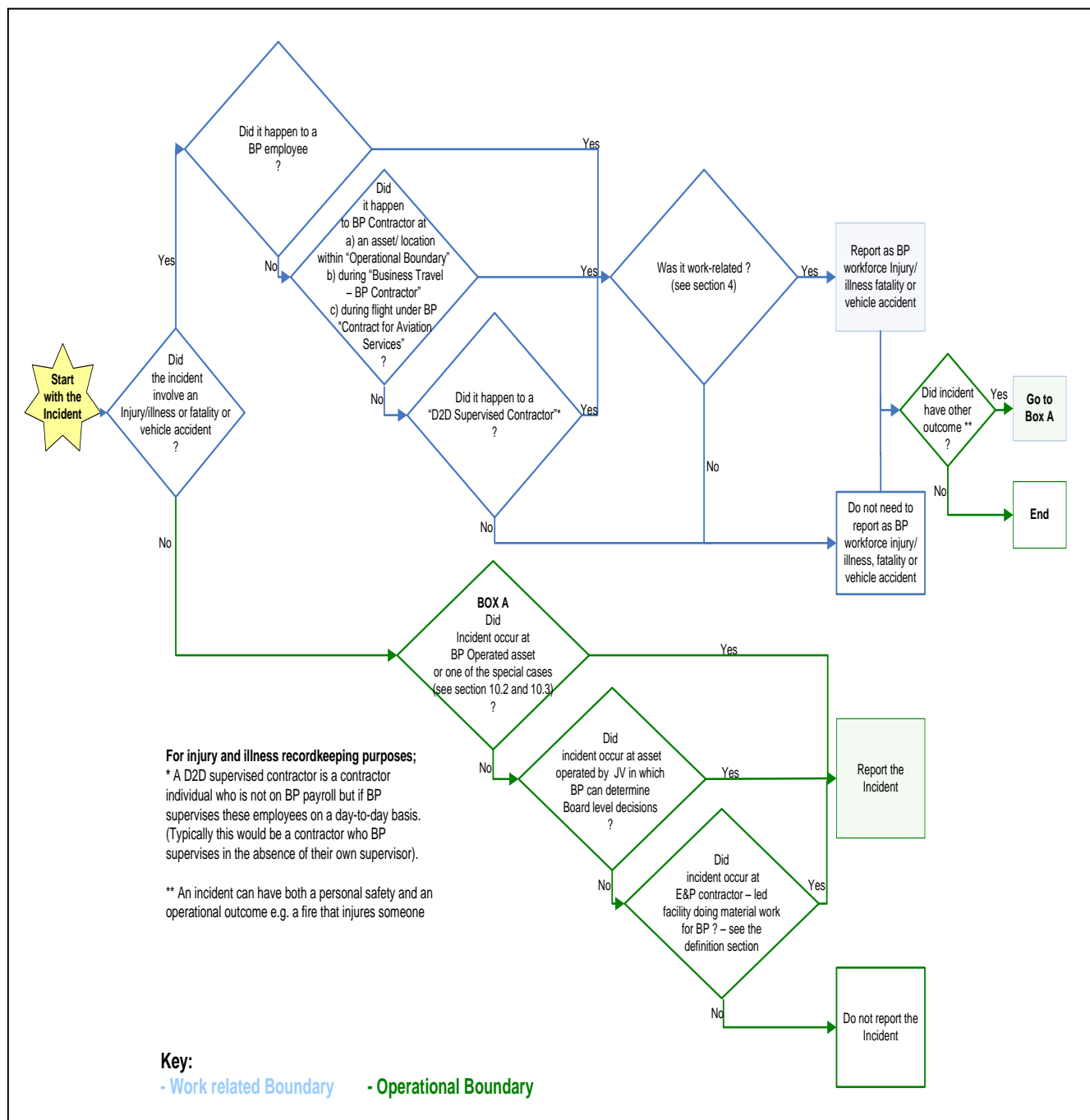
### 10.5 ILLUSTRATIVE CASE

For example an incident involving a loss of primary containment and an employee injury.

- If the incident occurs at a facility operated by BP and injures a BP employee, then it is within the boundary for LOPC and BP employee injuries, and it is reportable as both an LOPC and as an Employee injury.
- If the incident occurs at a customer’s premises, which a BP employee is visiting as part of their work for BP, then it is within the boundary for BP Employee injuries and is reportable as such. However, it is outside the “Operational Boundary” for LOPC and any LOPC would therefore not be reportable.

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**Figure 10.3 - Flowchart helping to establish whether an incident is “BP-recordable” incident for Group reporting purposes**





**Incident Investigation and Reporting****REFERENCES**

1. [Group Defined Practice on Reporting HSSE and Operational Incidents \(GDP 4.4-0001\)](#)
2. [Group Defined Practice on Incident Investigation \(GDP 4.4-0002\)](#)
3. [BP Group HSE Reporting Definitions](#)
4. [BP Group Recommended Practice for Marine Activity \(GRP 5.6-0001\)](#)
5. [Group Major Incident Reporting website](#)
6. [HSSE & Operational Data Reporting Requirements](#)
7. [Traction](#)
8. [Group OMS Glossary](#)
9. [Group OMS Library](#)
10. [BP Global Information Handling Standard](#)
11. [HSSE & Operational Incident Reporting Boundaries](#)
12. [Group Defined Practice on Aviation \(GDP 3.7-0001\)](#)
13. [Drilling and Well Operation Practice \(GP 10-00\)](#)

**Incident Investigation and Reporting****APPENDIX A – MODEL TERMS OF REFERENCE TEMPLATE****INCIDENT INVESTIGATION TEAM**

The following Investigation Team members and leadership have been agreed by the AzSPUL, Area / Wells Operations Manager, and Health and Safety Manager (Offshore, Midstream).

<i>Name</i>	<i>Position</i>
1. ....	.....
2. ....	.....
3. ....	.....
5. ....	.....
6...etc	

The Team Leader appointed by (Position.....) is (Name.....).

The Team Leader will:

- provide methodology guidance for the Investigation Team
- ensure compliance with the Terms of Reference
- ensure compliance with BP references for incident investigation
- ensure consensus among Team Members regarding report contents
- ensure persons accountable for actions agree with action(s) and date(s)
- report directly to (position), who is the Owner for this Investigation Team
- provide daily progress updates to the Owner for the duration of the investigation.

**OBJECTIVES**

1. Identify and review immediate causes of the incident.
2. Identify and analyze relative people, positions, parts and papers.
3. Identify and review system causes of the accident.
4. Map evidence; establish chronological list of events to identify critical factors.
5. Utilize “Comprehensive List of Causes; A Tool for System Cause Analysis” to analyze the incident.
6. Develop recommendations, corrective actions and lessons learned for the Owner's review and approval.

Focus is on prevention of recurrence of a like-in-kind incident and communications of positive optics.

\_\_\_\_\_(Owner)

**Incident Investigation and Reporting****APPENDIX B – DEFINITIONS**

Definitions in this procedure, where appropriate, are identical to [BP Group HSE Reporting Definitions](#).

Prompt reporting of incidents is essential. Before we can report we must be able to accurately classify our incidents. The Injury and Illness Reporting Decision Tree in Appendix F is an aid in this effort.

**WORK-RELATED**

An incident must be considered work-related if an event or exposure in the work environment caused or contributed to that incident occurring. For injury or illness, an incident must be considered work-related if the event or exposure caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness. Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring in the work environment unless one of the following exceptions applies in its entirety:

- Occurs when the employee was present in the work environment as a member of the general public
- Results solely from voluntary participation in a wellness program or in a medical, fitness, or recreational activity
- Involves signs or symptoms that surface at work but result solely from a non-work related event or exposure
- Is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption
- Is solely the result of an employee doing personal tasks at the establishment outside of the employee's assigned working hours
- Is solely the result of personal grooming, self medication for a non-work-related condition, or is intentionally self-inflicted
- Is caused by a vehicle accident and it occurs on a company owned parking lot or road while the employee is commuting
- Is the common cold or flu; and/or
- Is a mental illness (unless it is post-traumatic stress syndrome where it can be tied to a specific workplace incident, or are Incidents where the employee voluntarily provides an opinion from a physician or other licensed health care professional stating the employee's mental illness is work-related).

**BP WORK ENVIRONMENT**

The establishment and other locations (including marine vessels and vehicles) where one or more BP Employees and or BP Contractors are working or are present as a condition of their employment/contract. The work environment includes not only physical locations, but also the equipment or materials used by the employee or contractor during the course of his or her work.

**BUSINESS TRAVEL – BP EMPLOYEE**

Any travel undertaken for the purposes of work activities pursuant to the BP employee's contract of employment with BP plc or one of its subsidiary companies, to the following extent:

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- It includes the period from the time that person leaves their residence or their normal place of work until they return or until the time they arrive at their destination and check into temporary accommodation ('home away from home')
- It includes, on the return trip, the period from when the person checks out of their temporary accommodation until they arrive at their residence or their normal place of work.
- It includes the whole spectrum of travel, from international travel through to simple acts like crossing a public road on foot between two BP buildings.
- It excludes a person's normal commute to and from the office.
- It includes travel to the airport for a business trip from the time an employee leaves home even if that travel follows the same route as their normal commute. If the employee stops in the office first to work, then the period of the employee's business travel starts from the office and not their home.
- It excludes that person's commute from their home away from home to their temporary place of work or a significant detour made for personal reasons.

### BUSINESS TRAVEL - BP CONTRACTOR

Any travel undertaken for the purposes of work activities in which the BP Contractor is engaged in supplying BP plc or one of its subsidiary companies with goods and / or services, to the following extent:

- It includes day to day travel undertaken by a BP Contractor in the course of carrying out BP work-related activities.
- It excludes day to day travel undertaken by the BP Contractor when that person is not engaged in BP work related activities (such as their normal commute, or any travel undertaken in the interests of their own employer).
- It excludes Contractor mobilization and demobilization prior to work or on completion of work for BP. If, however, BP directs a contractor to make a journey and specifies or provides their means of travel (for example, specifies the airline to be taken, the route of travel, or provides the use of a BP car and driver), such travel would normally be included. In complex cases such as this guidance should be sought when reporting from your local HSE manager/champion, or from Finance (HSE Sunbury).

### EMPLOYMENT STATUS

We count both Company and Contractor incidents that are work related. Accounting for Contractor incidents is a function of premises, as well as the nature of work and whether it is at a 3rd Party fabrication site. A definition for Contractor follows in the next section.

### BP WORKFORCE

The BP Workforce comprises all BP Employees, all BP Contractors and all BP Directors.

### EMPLOYEE

An individual who has a current contract of employment with BP plc or one of its subsidiary companies.

### CONTRACTOR

An individual under a contractual relationship to supply BP plc or one of its subsidiary companies with goods and/or services.

A contractual relationship covers:

- All individuals contracted directly or sub-contracted

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- All employees of companies contracted directly or sub-contracted
- All situations where a contract has not been raised but BP's procurement policy would normally expect there to be a contract in place. This applies to all levels including sub-contracted relationships.

Note: For the purposes of HSE reporting any sub-contractor is to be treated as if they held a contract directly with BP plc or one of its subsidiary companies.

**THIRD PARTY**

Anyone who is not a BP Employee or a BP Contractor as previously defined in this document.

Members of the BP Workforce may be classified as third parties under specific circumstances. Three of the most common are:

- They are present in the BP Work Environment as a member of the general public (for example, an office worker refueling their car at a BP Retail Station).
- They are present in the BP Work Environment but are still commuting to work under OSHA definitions
- Those periods on a business trip when they are not deemed to be working under OSHA definitions - for example, during their temporary commute or when residing at their home away from home.

**INCIDENT**

An unplanned event or occurrence that affects or has the potential to affect the health or safety, or security of:

- people, or
- assets, or
- the environment.

**ACCIDENT**

An unplanned event or occurrence that affects the health or safety, or security of:

- people, or
- assets, or
- the environment.

**NEAR MISS**

An undesired event that, under slightly different circumstances, could have resulted in harm to people, damage to assets, environmental harm or unplanned operational shutdown. A near miss is an incident involving the unintentional transfer of energy but has no negative consequence.

**FIRST AID CASE**

An incident is classified as a First Aid if the treatment of the resultant injury or illness is limited to one or more of the 14 specific treatments below.

These are:

1. Using a non-prescription medication at non-prescription strength
2. Administering tetanus immunizations
3. Cleaning, flushing or soaking wounds on the surface of the skin

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4. Using wound coverings such as bandages, gauze pads, etc; or using butterfly bandages
5. Using hot or cold therapy
6. Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc
7. Using temporary immobilization devices while transporting as accident victim
8. Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister
9. Using eye patches
10. Removing foreign bodies from the eye using only irrigation or a cotton swab
11. Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means;
12. Using finger guards
13. Using massages, or
14. Drinking fluids for relief of heat stress.

If the treatment type isn't on the list then the case should be considered as medical treatment and will be counted as a recordable injury or illness.

Note: When determining whether a prescription medicine was used the normal practise is to apply the definitions used in the country where the incident occurred. However, when making this classification it should be remembered that the intent is to distinguish those more severe situations that require a medical practitioner to use strong antibiotics and painkillers from those that only require simple first aid.

#### MEDICAL TREATMENT CASE

A case arising from an Incident, in which the management and care of the patient to address the injury or illness is above and beyond First Aid. Medical Treatment does not include the conduct of diagnostic procedures, such as x-rays and blood tests, including the administration of prescription medications used solely for diagnostic purposes.

#### INJURY/ILLNESS

Injuries are a consequence of instantaneous events. Instantaneous events are characterised by a sudden and unexpected physical change which occurs over a short time and which results in immediate harm to people. A short time may be described as the snap of your finger or a single breath. Therefore, conditions such as sunburn, welders flash, friction blisters, or repetitive motion induced conditions are illnesses.

#### OCCUPATIONAL ILLNESS

An occupational illness is any abnormal condition or disorder, other than one resulting from an occupational injury, caused by exposure associated with the BP work environment. This includes acute and chronic illnesses or diseases which may be caused by inhalation, absorption, ingestion, or direct contact with physical, chemical, biological or psychological hazards in or associated with the working environment.

Guidance: In the BP work environment, whether an adverse health effect is classified as an occupational injury or occupational illness is determined by the nature of the original event or exposure which caused the case. Illnesses are caused by anything other than identifiable instantaneous events. e.g. if repeated or prolonged exposure is involved, the outcome is considered to be an illness.

Where an injury or illness has multiple causations, if any of the causation is from a work activity, it is sufficient to make the case work-related.

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Examples of occupational illnesses include: work-related upper limb disorders associated with prolonged computer use; asbestosis due to exposure to asbestos; noise induced hearing loss due to exposure to noise, gastro-intestinal illness due to food poisoning in the work environment.

Back cases are always considered injuries, by OSHA definition.

**OCCUPATIONAL INJURY**

An occupational injury is any harm to an individual caused by an instantaneous event in the work environment. Instantaneous events are characterised by a sudden and unexpected physical change which occurs over a short time and which results in immediate harm to people. A short time may be described as the snap of your finger or a single breath.

Guidance: In the BP work environment, whether an adverse health effect is classified as an occupational injury or occupational illness is determined by the nature of the original event or exposure which caused the case. Illnesses are caused by anything other than identifiable instantaneous events. e.g. if repeated or prolonged exposure is involved, the outcome is considered to be an illness.

Where an injury or illness has multiple causations, if any of the causation is from a work activity, it is sufficient to make the case work-related.

"Back cases" should be treated like any other Health incident and dealt with on a case by case basis.

**RECORDABLE OCCUPATIONAL ILLNESS AND INJURY**

Guidance: There are two sets of criteria for determining recordability, based on OSHA. If a case meets any of the listed criteria in either the general or specific, it must be considered recordable.

*General:*

- Death
- Days away from work
- Restricted work or transfer to another job
- Medical treatment beyond first aid
- Loss of consciousness
- A significant injury or illness diagnosed by a physician or other licensed health professional, such as:
  - Cancer
  - Chronic irreversible disease
  - Fractured or cracked bone, or
  - Punctured eardrum

*Specific:*

- Needlestick and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material
- Medical removal under Government standards
- Occupational hearing loss (current hearing test must show 10dBA shift from current baseline and total cumulative hearing loss must be 25dBA or move above audiometric zero).



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### RESTRICTED WORK OR JOB TRANSFER (RW/JT)

An incident is classified as a restricted work or job transfer case when:

- The member of the BP Workforce is kept from performing one or more of the routine functions of his or her job, or from working the full workday that he or she would otherwise have been scheduled to work or is transferred to a different job for all or part of his/her period of recuperation.
- A physician or other licensed health care professional recommends that the member of the BP Workforce not perform one or more of the routine functions of his or her job, or not work the full workday that he or she would otherwise have been scheduled to work or is transferred to a different job for all or part of his/her period of recuperation.

Guidance: Routine functions are these work activities the member of the BP Workforce regularly performs at least once a week.

### DAYS AWAY FROM WORK CASE (DAFWC)

A work-related injury or illness that would prevent the injured person from working on the day following that which the injury occurred, whether or not he or she is actually scheduled to work the following shift. If the medical professional declares that the individual is not fit to return to work on the day following the injury, then the case is classified as a DAFWC even if the following day is not a scheduled workday. If a person subsequently must have corrective surgery or otherwise miss work as a result of the work related injury, and does so during a scheduled absence then the injury is still considered a DAFWC.

### HIGH POTENTIAL (HiPo) INCIDENT

An Incident or Unsafe/Unhealthy Condition or near miss, including a security incident, where the most serious probable outcome is a Major Incident. In addition, this includes any Loss of Primary Containment (LOPC) Incident where the potential severity is classified at Level E or greater as defined in the Group-defined Operating practice 'Reporting HSSE and Operational Incidents'

Guidance on reporting HiPos: A HiPo may not be identified as such at the time of the incident and it is only after investigation that true the severity of the probable outcome becomes clear. If, after investigation, an Incident is found to fit these definitions, it should be reported as a HiPo, even if it is outside the nominated reporting timeframe.

### MAJOR INCIDENT (MIA)

An Incident, including a security incident, involving any one of the following:

- 1 or more fatalities associated with BP operations
- 10 or more injuries or health effects to BP workforce, either permanent or requiring hospital treatment for more than 24 hours.
- Significant adverse reaction from authorities, media, NGOs or the general public
- Costs from accidental equipment and property damage equal to or exceeding US \$ 1 Million
- Environmental Impact with A-E severity level

### RECORDABLE FATALITY

A fatality is deemed recordable unless the circumstances indicate that the event is not relevant to the measurement of the health and safety performance of the Company.



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Fatalities arising, for example, from suicide, inexplicable personal behaviour or natural causes would normally be excluded.

### INCIDENT SEVERITY

All incidents should be reported. Incident severity is determined per the Traction Severity Matrix or Severity Matrices in [Appendices D-E](#).

### VEHICLE ACCIDENT

A work-related accident involving a motor vehicle that occurs on or off-road resulting in injury, or loss/damage, or harm to the environment, whether this impacts BP and/or its contractor directly, or impacts a third party. This is irrespective of whether the accident was preventable or non-preventable. It excludes all accidents where:

- The BP Workforce vehicle was legally parked
- The journey is to or from the driver's home and normal place of work
- Minor wear and tear is the case (e.g. stone damage to a windscreen, minor paintwork damage)
- An Incident is the result of vandalism, or theft
- A company provided vehicle is being driven on non-work related activities (e.g. private business, leisure).

### SEVERE VEHICLE ACCIDENT

A Vehicle Accident that has been recorded in Traction with a severity level of A to G inclusive. The very minor severity H incidents are excluded from this measure. If any one of the following occurs the accident must have a severity level of at least G:

- Any incident involving a motor vehicle rollover, or incurring disabling damage requiring any of the Motor Vehicle(s) involved (BP and/ or 3rd party) to be recovered from scene with the following exceptions:
- Vehicle was operable, yet it was towed due to the driver not being physically fit to safely operate their motor vehicle
- Damaged vehicle is repairable at the scene of the incident, yet it is determined that the minor repairs, e.g., tire or lamp replacement, cannot be completed safely on the roadside. Therefore, the motor vehicle is towed to a safe location to complete the minor repairs.
- It is determined based on investigation and corroborating evidence that damages sustained to a 3rd party motor vehicle rendering it inoperable occurred prior to contacting the company unit.
- Recordable injury to any single person off site
- Any off-site spill greater than 1 barrel of product, while in transit, by a company motor vehicle.

### LOSS OF PRIMARY CONTAINMENT (LOPC)

An unplanned or uncontrolled release of material from Primary Containment.

Guidance: Unplanned or unintentional releases are to be reported as loss of primary containment (LOPC) irrespective of the need for an immediate corrective action. However, fugitive emissions or gases released to the atmosphere from properly designed and operating safety devices (such as a flare, scrubber or relief device designed per API Standard 521 or an equivalent industry standard) are not considered as a loss of primary

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containment and are excluded. Releases from safety devices which have not operated as designed are to be reported as LOPC e.g. liquid releases from a gas flare system.

**UNCONTROLLED RELEASE/EVENT**

Any uncontrolled event where process fluids are released from primary containment and which results in the need for immediate corrective action (e.g. shutdown, evacuation or isolation) to mitigate the effects of loss of containment. Fugitive emissions and minor flange, hose joint or seal liquid leaks which can be contained by capturing the fluid for safe disposal should not be included.

Guidance: A 'Hydrocarbon Spill Greater than or equal to 1 barrel' as defined above should also be reported as an uncontrolled release, provided it meets the definition of an uncontrolled release.

When reporting a material release in Traction the additional field "uncontrolled release" should be checked if the release conforms to the above description.

Note: process fluids are defined as flammable, corrosive or toxic fluids; or inert gases that could deplete oxygen levels; or otherwise inert fluids by nature of their temperature or pressure are considered dangerous to people. For examples and further information Refer Group IM Metrics and Reporting, <http://integritymanagement.bpweb.bp.com/>.

**PRIMARY CONTAINMENT**

A tank, vessel, pipe, rail car or equipment intended to serve as the primary container or used for the transfer of the material. Primary containers may be designed with secondary containment systems to contain and control the release. Secondary containment systems include, but are not limited to, tank dykes, curbing around process equipment, drainage collection systems into segregated oily drain systems, the outer wall of double walled tanks etc.

**UNSAFE/UNHEALTHY CONDITION**

Any departure from the required or expected performance or condition of equipment (Plant), procedures (Process), or People, which if not addressed could result in an Incident, or make a consequence of an incident more severe. For example, thinning of pipes due to corrosion or excessive work hours causing fatigue.

**INCIDENT INVESTIGATION**

The methodical examination of an incident; incident investigation activities are directed toward identifying the facts and circumstances related to the event, determining the causes, and developing remedial actions to control the risks.

**10.6 IM RELATED INCIDENT**

Any incident where the root cause would be addressed by the IM GDP and where there is actual or potential harm to people or the environment. This includes:

- Loss or potential loss of primary containment

OR

- The failure of an engineered system (including mechanical, electrical, structural, lifting, process or process control, and protective systems).

**Incident Investigation and Reporting****PROCESS SAFETY**

A disciplined framework for managing the integrity of hazardous operating systems and processes by applying good design principles, engineering and operating practices. It deals with the prevention and control of incidents that have the potential to release hazardous materials or energy. Such incidents can cause toxic effects, fire or explosion and could ultimately result in serious injuries, property damage, lost production and environmental impact.

**PROCESS SAFETY INCIDENT**

An unplanned event or occurrence which has, or could have, released hazardous materials or energy.

Guidance: Examples of Process Safety Incidents include:

- Loss of Primary Containment (e.g. oil spills, gas releases) from process plant
- Fires or Explosions resulting from a flammable liquid or gas release
- Injuries or Fatalities resulting from a Fire or Explosion.

**EQUIPMENT /PROPERTY DAMAGE (INCIDENT DIRECT COST)**

Direct cost attributed to an Incident such as replacement value of equipment, cost of repairs, immediate clean-up, and emergency response.

**HOME AWAY FROM HOME**

When an employee on travel status checks into a hotel, motel, or other temporary residence, he or she is considered to have established a "home-away-from-home." In such cases, the employee's activities must be evaluated in the same manner as an employee who leaves work and is essentially "at home". If employee gets injured after "home-away-from-home" has been established this will not be considered work related.

Injures and illnesses that occur to an employee while on travel status are work-related if at the time of injury or illness the employee was engaged in work activities" in the interest of BP".

The normal exclusion for "Home Away From Home" is not applied to BP personnel and contractors that are working and living in out remote sites (offshore, onshore) as this facilities owned, managed or controlled by BP. This means that BP-provided living accommodations are considered a condition of employment where there is a BP policy or contractual agreement that employee resides at BP owned, managed or controlled housing. This will imply that any injury or illness experienced by the employee while at that housing irrespective of whether injury/illness occurred in employee's working hours or off time will be considered work related unless eliminated from reporting through the use of **nine exceptions** to [work relationship](#).

**Reference:** Clarification letter published by OSHA in 2007. This new exclusion for "Home Away From Home" is applied in AzSPU from 1st January 2009.

However, if housing made available by BP is accepted by the employee voluntarily, for example, on a normal landlord-tenant basis and in preference to other reasonably available facilities, such housing would not constitute a condition of employment.

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### EXPLOSION

An Incident involving the unintentional, rapid and destructive release of materials and / or energy, including detonations, deflagrations and physical overpressures that result in physical damage.

Guidance: Any explosion of any kind should be reported.

Explosions are typically related to Process-Safety Incidents. For example:

- A 'puff' during a furnace start-up that results in damage to the refractory or bends the walls
- A failure of a pressure control system on a tank that results in an overpressure that bulges a tank.

Explosions do not include:

- An overpressure that results in the activation of a relief valve
- An overpressure that results in the burst of a rupture disk
- A 'puff' during a furnace start-up that results in no damage to the furnace.

### FIRE

An Incident involving either the unintentional ignition of material resulting in flame or smoke, or an unintentional electrical arc.

Guidance: Any fire of any magnitude should be reported irrespective of whether it is considered a Process Safety Incident or not.

Examples of fires that may be considered Process Safety Incidents include:

- A gas, oil or chemical release that results in a flame.
- A tangible indication of a fire in a plant handling hydrocarbons (e.g. soot on the inside of a distillation tower) where no flame was actually seen.
- A fire, including an electrical arc, from a 120 or 220 volt shorted switch in an operation handling hydrocarbons.

Examples of fires that are not normally considered Process Safety Incidents include:

- A paper or cardboard fire in a garbage / trash can in an office building.
- A fire during equipment repair in a maintenance shop.
- A solvent fire in a laboratory.
- Smouldering rags in a pump house (whether or not there is a flame).
- A fire in a vehicle in a parking lot.

### ACUTE RELEASE

A sudden release of material that reaches or exceeds the LOPC reporting threshold in approximately one (1) hour or less.

### FRAUD

Intentional scheme to obtain money or property belonging to the company by means of false pretence.

### SECURITY INCIDENT

An incident within the scope of this practice that affects the security of BP's workforce, premises or assets, or operation or project. Such an incident includes or may include any of

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the following: assault / threat, burglary, civil unrest, criminal property damage, drug/alcohol abuse / possession, robbery, security of information breach, and terrorist / guerrilla activity or theft.

### MAJOR SECURITY INCIDENT

An incident that involves:

- Kidnapping of company personnel or contractor's staff.
- Evacuation of personnel from an operative site.
- Security-related shutdowns of a well site, which might may result in present production losses, thereby significantly affecting total daily production rates in excess of 10,000 barrels per day (gross) or more.
- Civil disturbances in the country, which call for possible or actual evacuation of personnel.
- Bombing, serious sabotage or serious crimes resulting in losses or damages.
- Hostage situation.
- Overt or explosive attacks against a location, vessel, aircraft, or company personnel or assets, or explosive attacks.
- Significant extortion or blackmail.

### HIGH POTENTIAL SECURITY INCIDENT

An incident that involves:

- Abductions or short-time (less than 12 hours) detention.
- Serious non-compliance with company directives to manage security information.
- Attacks against company or contractor personnel, locations or assets, or minor explosive attacks.

### MARINE RELATED INCIDENT

An unplanned event or occurrence that affects or has the potential to affect the health or safety, or security of; people engaged in marine activity, or the marine systems or floating structure of marine assets, the ship/shore interface of terminals or incidents involving pollution of the marine environment.

### INCIDENT INVESTIGATION

The methodical examination of an incident; incident investigation activities are directed toward identifying the facts and circumstances related to the event, determining the causes, and developing remedial actions to control the risks.

### BP's RCA INVESTIGATION

An Incident Investigation undertaken by an incident investigation team using BP's RCA process (CLC) for gathering evidence; undertaking interviews; utilising human factor tools; determining root cause through identification of critical factors, possible immediate and system causes and subsequent use of the 5-Why technique to identify underlying systemic causes; developing proposed corrective actions; and submitting an incident investigation report. Utilization of BP's RCA process requires basic root cause specialist or MRCS training.

### CRITICAL FACTOR

An event, action or condition contributing to the incident that, if eliminated would have either prevent the incident from happening or reduce its severity.

## Incident Investigation and Reporting

### UNSAFE/UNHEALTHY CONDITION

Any departure from the required or expected performance or condition of equipment (Plant), procedures (Process), or People, which if not addressed could result in an Incident, or make a consequence of an incident more severe. For example, thinning of pipes due to corrosion or excessive work hours causing fatigue.

### “CONTRACT FOR AVIATION SERVICES”

A contract under which aviation services are provided to BP, which include or are expected to include passenger travel in aircraft (excluding travel by personnel of the aviation supplier, any aviation operator under the contract, or any personnel of their contractors or subcontractors):

This definition includes shared services agreements and other such arrangements for the carriage of passengers, under which BP's direct contract may be with another party (such as another energy company) rather than directly with the aviation operator.

This definition includes BP contracts with an aviation supplier for the provision of emergency response, where the aircraft are expected to carry passengers.

A turnkey contract involving aviation, including seismic, aeromagnetic or pipeline inspection services, is not a contract for aviation services if the only personnel to be carried by aircraft under those contracts are personnel involved in supplying the contracted service to BP. However, if the contract also provides for the carriage of passengers, then those flights which carry passengers is not a contract for aviation services shall be deemed

### “D2D SUPERVISED CONTRACTOR”

For injury and illness recordkeeping purposes a day to day supervised contractor is a contractor individual who is not on BP payroll but if BP supervises these employees on a day-to-day basis.

### “DEDICATED TO BP'S BUSINESS USE”

A vehicle, aircraft or rail rolling stock is dedicated to BP's business use, for HSSE reporting purposes, where it has been designated, normally under contractual terms, to be exclusively available for the provision of goods and or services to BP during a period of time; the vehicle is unavailable for business use by other parties. This excludes spot chartered vehicles, aircraft or rolling stock because these are regularly available for business use by other parties and as such are not dedicated to BP's business use.

### “E&P CONTRACTOR LED FACILITY DOING MATERIAL WORK FOR BP”

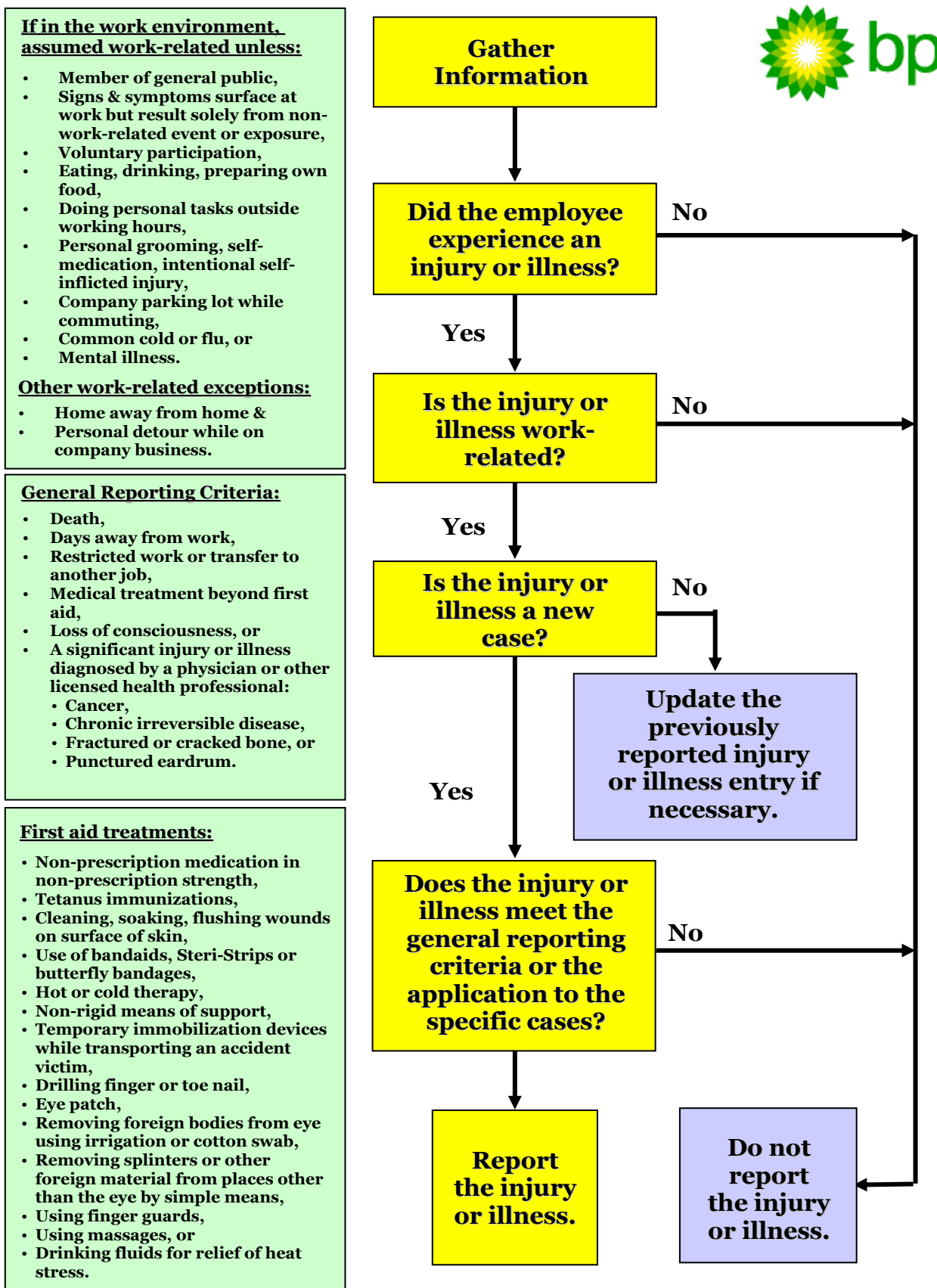
The following list is intended to illustrate what is meant by the term “E&P contractor led facility doing material work for BP”. The list is not exhaustive and members of E&P should refer to the E&P Segment HSSE team if further guidance is needed:

- An offshore construction vessel, once the vessel is in position and its activities associated with the BP project have begun.
- A drilling rig while the rig is secured in the location from which it will perform the well work for BP (laid anchors for offshore).
- Seismic activity once within the BP block from earliest of deployment streamers or entering block.
- Pipelay vessels while engaged in dedicated BP pipe laying activity.



## Incident Investigation and Reporting

## APPENDIX C - INJURY AND ILLNESS REPORTING DECISION TREE





## Incident Investigation and Reporting

## APPENDIX D - SEVERITY MATRIX, HSE IMPACT LEVELS

SEVERITY LEVEL	HEALTH AND SAFETY	ENVIRONMENTAL
<b>A-D</b>	<ul style="list-style-type: none"> <li>3 or more fatalities.</li> <li>Identified onset of life-threatening health effects to 3 or more individuals.</li> <li>30 or more injuries or health effects, either permanent or requiring hospital treatment for more than 24 hours.</li> </ul>	<ul style="list-style-type: none"> <li>Event with widespread or extensive damage to any environment, including sensitive and non-sensitive environments, and remains in "unsatisfactory" state for a period of &gt; 5 years.</li> <li>Event with widespread or extensive damage to a non-sensitive environment and can be restored to an equivalent capability in a period of around 1 year.</li> <li>Event with localized, widespread or extensive damage to a sensitive environment and can be restored to an equivalent capability in a period of around 1 year.</li> <li>Event with widespread or extensive damage to a non-sensitive environment and can only be restored to a satisfactory / agreed state in a period of more than 1 year and up to 5 years.</li> <li>Event with widespread or extensive damage to a sensitive environment and can only be restored to a satisfactory / agreed state in a period of more than 1 year and up to 5 years.</li> <li>Event with widespread damage to a sensitive or non-sensitive environment and can be stored to an equivalent capability in a period of months.</li> <li>Event with extensive damage to a sensitive environment and can be restored to an equivalent capability in a period of months.</li> </ul>
<b>E</b>	<ul style="list-style-type: none"> <li>1 to 2 fatalities, acute or chronic, actual or alleged.</li> <li>10 or more injuries or health effects, either permanent or requiring hospital treatment for more than 24 hours.</li> </ul>	<ul style="list-style-type: none"> <li>Event with localized damage to a non-sensitive environment and can be restored to an equivalent capability in a period of 1 year.</li> <li>Event with extensive damage to a non-sensitive environment and can be restored to an equivalent capability in a period of months.</li> <li>Event with localized damage to a sensitive environment and can be restored to an equivalent capability in a period of months.</li> <li>Event with extensive damage to a sensitive environment and can be restored to an equivalent capability in a period of days or weeks.</li> </ul>
<b>F</b>	<ul style="list-style-type: none"> <li>Permanent partial disabilities.</li> <li>Several non-permanent injuries or health impacts.</li> <li>Days Away From Work Case (DAFWC)</li> </ul>	<ul style="list-style-type: none"> <li>Event with localized damage to a non-sensitive environment and can be restored to an equivalent capability in a period of months.</li> <li>Event with immediate area damage to a sensitive environment and can be restored to an equivalent capability in a period of months.</li> <li>Event with extensive damage to a non-sensitive environment and can be restored to an equivalent capability in a period of days or weeks.</li> <li>Event with localized damage to a sensitive environment and can be restored to an equivalent capability in a period of days or weeks.</li> </ul>
<b>G</b>	<ul style="list-style-type: none"> <li>Single or multiple recordable injury or health effects from a common source / event.</li> </ul>	<ul style="list-style-type: none"> <li>Event with immediate area damage to a non-sensitive environment and can be restored to an equivalent capability in a period of months.</li> <li>Event with localized damage to a non-sensitive environment and can be restored to an equivalent capability in a period of days or weeks.</li> <li>Event with immediate area damage to a sensitive environment and can be restored to an equivalent capability in a period of days or weeks.</li> </ul>
<b>H</b>	<ul style="list-style-type: none"> <li>First aid.</li> <li>Single or multiple over-exposures causing noticeable irritation but no actual health effects.</li> </ul>	<ul style="list-style-type: none"> <li>Event with immediate area damage to a non-sensitive environment and can be restored to an equivalent capability in a period of days or weeks.</li> </ul>

## Incident Investigation and Reporting


**APPENDIX E - SEVERITY MATRIX, BUSINESS IMPACT LEVELS**

*When categorising business impact severity to meet the requirements of this practice, only equipment / property damage (replacement cost) as a result of a HSSE incident or unsafe / unhealthy condition shall be considered.*

SEVERITY LEVEL	EQUIPMENT/PROPERTY DAMAGE	NON-FINANCIAL IMPACT PRIVILEGE TO OPERATE
<b>A-D</b>	>\$10m Equipment/Property Damage	<ul style="list-style-type: none"> <li>Public or investor outrage in markets where we have presence or aspirations.</li> <li>Prolonged adverse national or international media attention.</li> <li>Loss of license to operate an asset or threat of global loss of license to operate.</li> <li>Intervention from the government.</li> <li>Severe enforcement action against a material asset in a non-major market, or against other assets in a major market.</li> <li>Widespread adverse social impact.</li> <li>Damage to relationships with key stakeholders of benefit to the Segment or BP group.</li> <li>Localized or limited interest-group outrage in a major market.</li> </ul>
<b>E</b>	\$1m – \$10m Equipment/Property Damage	<ul style="list-style-type: none"> <li>Other adverse enforcement action by regulators.</li> <li>Limited interest-group outrage in a non-major market.</li> <li>Short term adverse national or international media coverage.</li> <li>Damage to relationships with key stakeholders of benefit to the Strategic Performance Unit (SPU).</li> </ul>
<b>F</b>	\$100k – <\$1m Equipment/Property Damage	<ul style="list-style-type: none"> <li>Regulatory compliance issue which does not lead to regulatory or other higher severity level consequence.</li> <li>Prolonged adverse local media coverage.</li> <li>Local adverse social impact.</li> <li>Damage to relationships with key stakeholders of benefit to the Operating Area.</li> </ul>
<b>G</b>	\$25k – <\$100k Equipment/Property Damage	<ul style="list-style-type: none"> <li>Short term adverse local media coverage.</li> <li>Some disruption to local operations (e.g., loss of single-road access for less than 24 hours).</li> </ul>
<b>H</b>	<\$25k Equipment/Property Damage	<ul style="list-style-type: none"> <li>Isolated and short term complaints from neighbors (e.g., complaints about specific noise episode).</li> </ul>

## Incident Investigation and Reporting


## APPENDIX F - POTENTIAL SEVERITY CLASSIFICATION, LOPC OF FLAMMABLE GASES, LIQUIDS AND OTHER HAZARDOUS CATEGORIES (ACUTE RELEASE)

Loss of Primary Containment – Potential Severity Classification					
Type of Substance	Flammable Gases and Vapours		Flammable Liquids <sup>1</sup>		Other Hazardous Categories including combustible or corrosive gases/ fluids/vapours or solids
	Onshore confined releases  Offshore releases – manned facilities	Onshore, unconfined releases  Offshore releases – unmanned facilities	Offshore – loss of primary containment	Onshore – loss of primary containment	Onshore/offshore – loss of primary containment.  Oil spills related to marine activity.
<b>Level A-D</b>	> 5000 kg	> 50000 kg	> 10000 kg	> 100,000 kg	>1000 bbl (fluids) >200,000 kg (gas/vapours/solids)
<b>Level E</b>	500 < 5000 kg	5000 < 50000 kg	1000 < 10000 kg	10000 < 100,000 kg	100 <1000 bbl (fluids) 20,000 <200,000 kg (gas/vapours/solids)
<b>Level F</b>	50 < 500 kg	500 < 5000 kg	100<1000 kg	1000 < 10000 kg	10 <100 bbl (fluids) 2000 <20,000 kg (gas/vapours/solids)
<b>Level G</b>	5 < 50 kg	50 < 500 kg	10 < 100 kg	100 < 1000 kg	1 < 10 bbl (fluids) 200 < 2000 kg (gas/vapours/solids)
<b>Level H</b>	< 5 kg	< 50 kg	< 10 kg	< 100 kg	< 1 bbl (fluids) < 200 kg (gas/vapours/solids)
<b>Definitions</b>	Definition of flammable gas:  Gaseous material, at ambient temperature/pressure, that forms a flammable mixture where the Lower Flammable Limit is <13%, or the range between the Lower and Upper Flammability Limit is >12%.		Definition of flammable liquid:  Liquids having a flashpoint less than or equal to 38 °C, or  High-flash liquids (38 °C or higher) stored or handled at temperatures above or within 8 °C of their closed cup flashpoint.		A comprehensive list of substances is available under the categorization of Packing Group II or III materials as defined by United Nations (UN) Dangerous Goods definitions.  (e.g., corrosives including acid or base, organic peroxides, pyrophoric, combustible liquid >38 °C flash point, heating oils)

<sup>1</sup> Rule of Thumb: conversion factor is approximately 150 kg = 1 barrel.

## Incident Investigation and Reporting

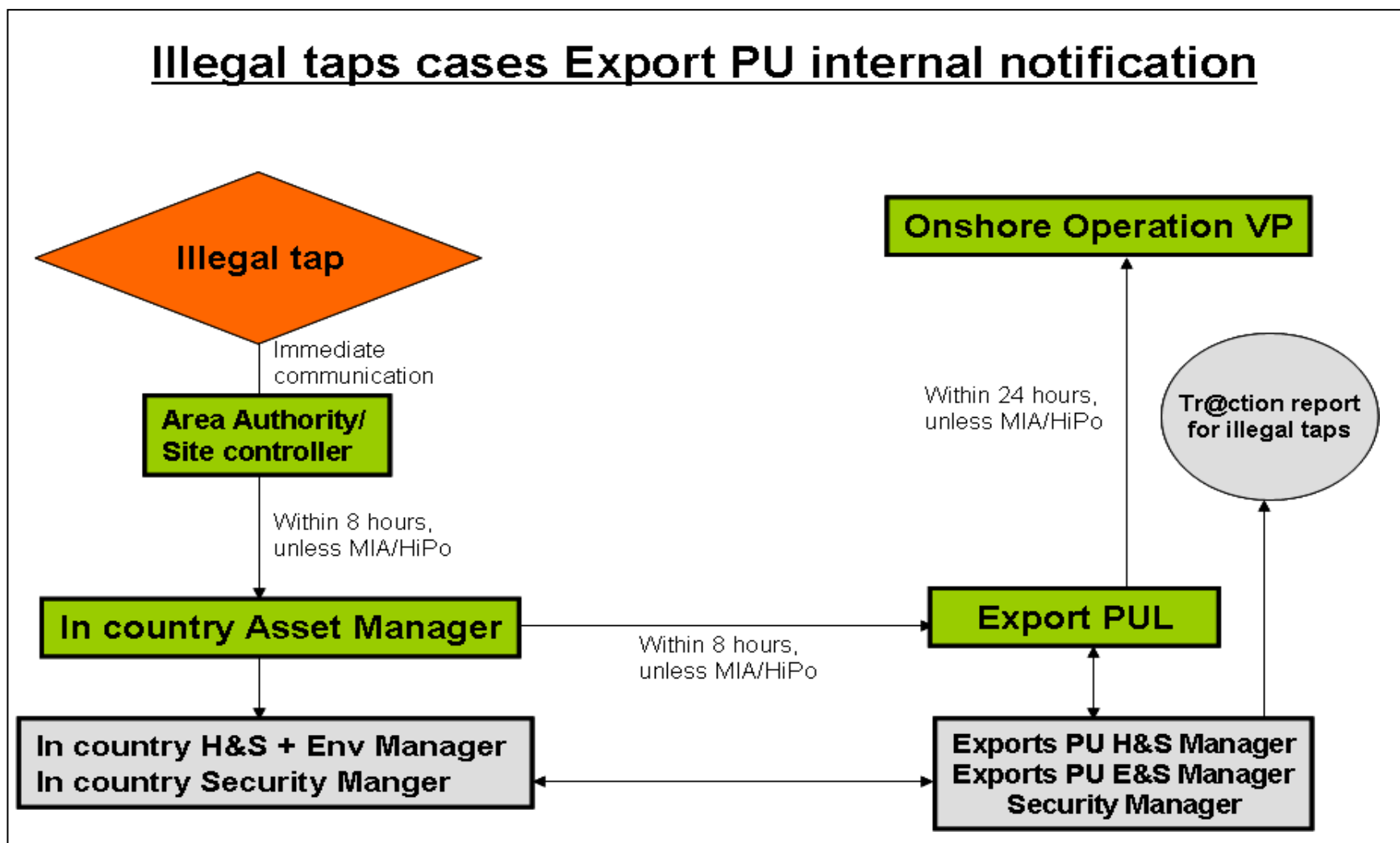
## APPENDIX G - POTENTIAL SEVERITY CLASSIFICATION, LOPC OF TOXIC SUBSTANCES (ACUTE RELEASE)

Toxic Substances - Potential Severity Classification (Potential Human Inhalation Hazard)				
Substance Class	Lower Toxicity Substance (Class D)	Medium Toxicity Substance (Class C)	Higher Toxicity Substance (Class B)	Acutely Toxic Substance (Class A)
	All gas, vapour, mist or aerosol LOPC, regardless of location			
Level A-D	> 4000 kg	> 2000 kg	> 1000 kg	> 50 kg
Level E	2000 < 4000 kg	1000 < 2000 kg	250 < 1000 kg	15 < 50 kg
Level F	200 < 2000 kg	100 < 1000 kg	25 < 250 kg	5.0 kg < 15 kg
Level G	50 < 200 kg	25 < 100 kg	5 < 25 kg	0.5 < 5.0 kg
Level H	< 50 kg	< 25 kg	< 5 kg	< 0.5 kg

From proposed CCPS and API guidelines based on UN Dangerous Goods definitions, November 2007.

## Incident Investigation and Reporting

## APPENDIX H - EXPORTS PU INTERNAL INCIDENT NOTIFICATION REQUIREMENTS FOR ILLEGAL TAPS




## Incident Investigation and Reporting

## APPENDIX I - ONSHORE OPERATIONS EXTERNAL NOTIFICATION REQUIREMENTS

What	When	By Whom	To Whom
Major Incidents (MIAs)	<24hrs (verbal) <3 days (written)	AzSPU CHSSE (Az) or C&EA (Geo) ( <i>during office hours</i> ) or Duty Incident Commander ( <i>out of office hours</i> )	In-country Regulators
	<2 days	PUL	Partners (BTC or SCP)
	<3 days	BTC Commercial	BTC Lenders (BTC MIAs only)
High Potential Incidents (HiPos)	<24 hrs (verbal) <3 days (written)	AzSPU CHSSE (Az) or C&EA (Geo) ( <i>during office hours</i> ) or Duty Incident Commander ( <i>out of office hours</i> )	In-country Regulators
	<2 days	PUL	BTC or SCP Partners
	<3 days	BTC Commercial	BTC Lenders (BTC HiPos only)
Any other Incident (that is not an MIA or HiPo)	<5 days	Onshore PU E&S Manager (Environmental Incidents only)	BTC Lenders
Spill / material release to the environment (i.e. that breach secondary containment) that is not an MIA or HiPo	24 hrs verbal 72 hrs written	CHSSE External Relations (Az) or C&EA Teams (Geo)	Regulatory notification

**Incident Investigation and Reporting****APPENDIX J - INCIDENT CLASSIFICATION, RESOLUTION PROCEDURE**

<b>Incident Classification – Resolution Procedure</b>	
<ul style="list-style-type: none"> <li>• The business line shall be accountable for reporting HSSE data in accordance with the requirements of this practice. Group S&amp;O provides specific subject matter expertise on HSSE topics to support accurate and consistent reporting. S&amp;O finance is accountable for providing assurance on the integrity of all group HSSE data.</li> <li>• Clarification on the reportability or classification of specific HSSE incidents may be requested by group S&amp;O or by S&amp;O finance. These may include, for example, whether an incident is work-related, whether an injury is properly classified as DAFWC or a recordable Injury, whether or how an incident is properly classified as Loss of Primary Containment (LOPC), or incident severity classification.</li> <li>• Request for clarification from group S&amp;O or S&amp;O finance shall be directed to the line initially through the relevant segment HSSE functional lead or function HSSE equivalent. In response, line management shall consult with local and BP group subject matter experts as needed.</li> <li>• If a difference of view is identified and not resolved by this means, the issue shall be referred to S&amp;O HSSE head of discipline and S&amp;O finance manager who shall consult with representatives from the segment (or equivalent) and, if appropriate, with resources outside the company before advising line management of their recommendation.</li> <li>• In order to reach resolution, it may be necessary to escalate through both the line and the functional organizations. Ultimate authority for classification resolution resides with executive management.</li> </ul>	



## Incident Investigation and Reporting

**APPENDIX K - INITIAL INTERNAL INCIDENT NOTIFICATION FORM**

To assist with verbal notification of MIAs, HiPOs, all injury/illness incidents and all production loss events.

<b>Notification of :</b> (insert incident title)	
<b>Location:</b>	(VP Group / Operating Area / Facility / Specific Location etc)
<b>Date of the Event:</b>	
<b>Time of the Event:</b>	
<b>Brief Description:</b>	
<b>Injury/Illness Details:</b>	
<b>Damage/Loss Details:</b>	
<b>Likely Causes:</b>	
<b>Immediate Actions Taken:</b>	
<b>Potential:</b>	
<b>Person reported the Incident</b>	
<b>Person Leading the Investigation, if known:</b>	

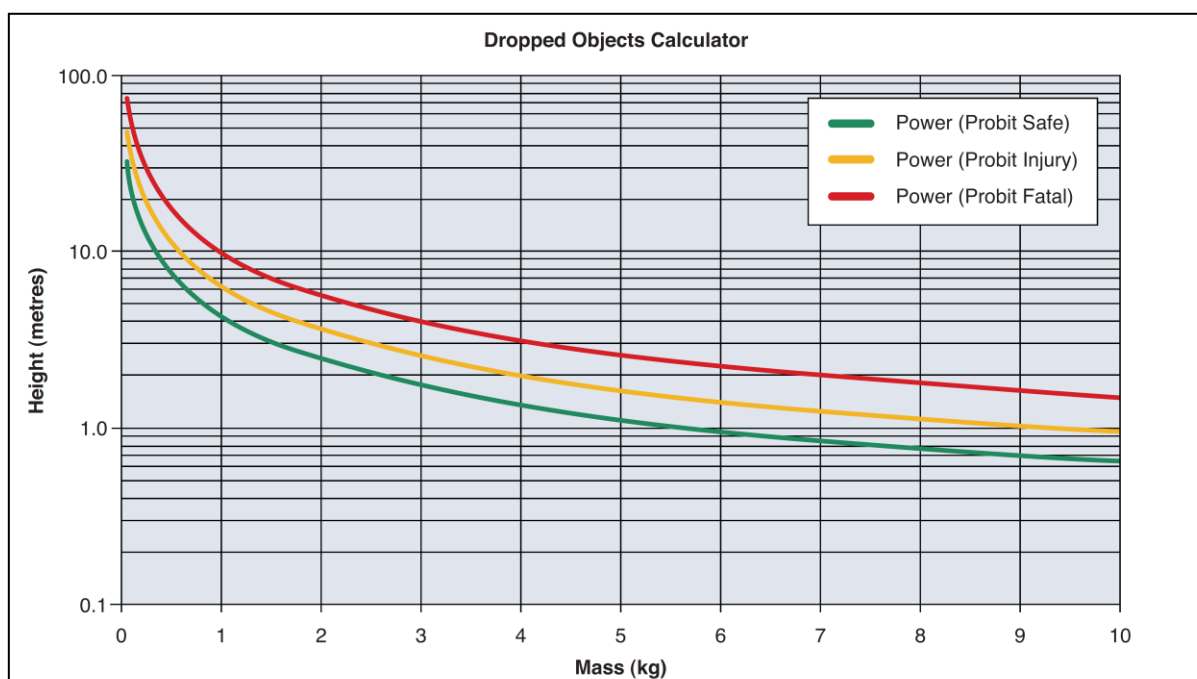
## Incident Investigation and Reporting

## APPENDIX L - GUIDANCE ON USE OF DROPS CALCULATOR AND DROPPED OBJECT HIPO DETERMINATION.

The DROPS calculator is effectively a graph template upon which a dropped object 'is plotted', based upon the mass of the object and the distance that it fell, in order to determine its potential effects.

The graph is based on three probit functions. A probit function indicates the relationship between exposure and the probability that the consequential risk takes place. This is a method which is currently available to determine the effects of dropped objects:

- With light objects (<0.1kg) the most important effect is the skin being punched and the tissue/organic functions being damaged; this criteria can be used for incidents such as breaking glass flying around or metal particles
- With heavier objects (>0.1kg) the effects of skull fractures are used



All dropped objects that occur on, or at, a BP establishment or location, or as a result of BP-related work, **shall** be appropriately assessed and reported.

Whilst the actual severity of any dropped object is generally easy to determine, it is important that in all cases the most likely potential severity of the dropped object is understood.

To assist in understanding the most likely potential severity, the AzSPU uses the industry standard Dropped Objects Prevention Scheme (DROPS) consequence calculator, the DROPS calculator.

### **Use the DROPS calculator to establish the likely severity.**

**Note:** The use of DROPS gives an indication of the likely severity of a dropped object and in any analysis, the following questions **should** be considered:

<b>Incident Investigation and Reporting</b>
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- Was the energy potential expended in some way as the object fell (ie deflected by pipework)? If so, you **should** assume that DROPS may have overestimated the likely potential severity.
- Was the object that 'dropped' of differing size? The DROPS calculator was based on an object delivering a force over a small surface area (point load), so the force delivered from an object of differing size and makeup needs to be considered.
- Was the dropped object made of solid material? DROPS assumes a solid object. In some rare cases the material may not always be solid and DROPS may have therefore overestimated the likely potential severity.
- Did the object fall into a 'barriered off' area or an area where no personnel were present? If so then this would again have the effect of lowering the likely potential severity indicated by DROPS.

**Note:** Any reassessment of the likely severity as a result of any of the above questions is going to be subjective, the purpose of this guidance is to ensure that a meaningful review of the likely potential severity indicated by the DROPS calculator is carried out, even if the eventual outcome remains unchanged.

**Decide whether the incident is BP reportable as a HiPo.**

The ultimate potential of any dropped object incident is determined by asking what the most serious probable outcome would have been. For a HiPo, the most relevant serious probable outcome refers to those incidents that could have led to either:

- A fatality associated with BP operations
- Multiple serious injuries
- A significant adverse reaction from authorities, media, NGOs or the general public
- The cost of accidental damage exceeding US \$500,000

In reaching a conclusion as to the likely potential severity of a dropped object incident, further consideration **shall** also be given to the following:

The location in which the object falls. In the extreme, a heavy object falling into the sea would not raise any question in terms of a likely personnel injury outcome (provided a vessel was not present and no diving operations were ongoing), so the same would apply to locations on a platform or rig which are rarely accessed by people.

There has to be proximity – for a dropped object incident to be defined as a BP recordable HiPo, the following two criteria **must** be met:

- An individual needs to be close to the impact area when the dropped object actually lands, and
- In a position where it would be reasonable to assume that in slightly different circumstances they could have been struck by the object (ie they have just left the area where it actually landed)

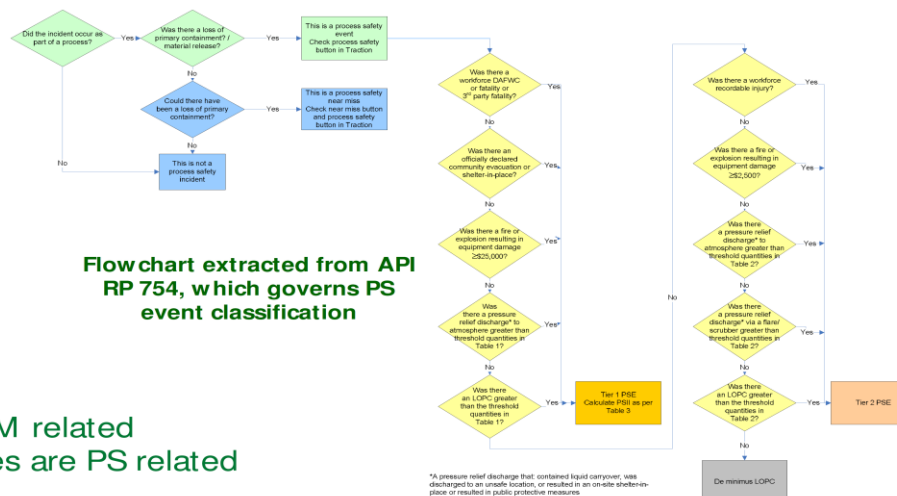
There has to be some kind of reported incident. So as a guide, if an object (that had clearly dropped) was 'found' on the floor and was of a weight that would have potentially resulted in a fatality, but the incident had not been observed or heard, then the assumption would be that nobody was present and it would not be reportable as a HiPo.

The fact that an area has been barriered off to keep people away from a potential dropped object situation is valid grounds to declare that there was no risk of injury.

## Incident Investigation and Reporting

## APPENDIX M - PROCESS SAFETY INCIDENT CLASSIFICATION GUIDANCE (Consider A3 format when printing)

Process Safety Related	Not Process Safety Related
LOPC (from process plant) of <b>any</b> material	LOPC ( <b>not</b> from process plant)
Fire or Explosion in process / bulk storage area	Fire or Explosion <b>not</b> in process / bulk storage area
Events/Near Misses occurring as part of a process	Events/Near Misses occurring which <b>are not</b> part of a process



All Process Safety event/near misses are also IM related  
**Not all** Integrity Management event/near misses are PS related

## What is a Process Safety event?



	1	2	3
Investigation Owner	SPU Leader	Vice President Operations or Midstream	Installation Manager

		Potential Severity		
		E & above	F	G & below
Actual Severity	E & above	1		
	F	2	2	
	G & below	2	3	3

## Process Safety Event

An unplanned or uncontrolled loss of primary containment (LOPC) of any material whether or not on the United Nations Dangerous Goods List (UNDGL) (e.g. steam, hot condensate or compressed air) from a process,

## Process Safety Near Miss

an undesired event or condition that, under slightly different circumstances, could have resulted in a LOPC of a material (as stated in API RP754).

Protective Layers	Discovered in failed state / disrepair / not followed / missing	Incorrectly set	Activated spuriously	Activated on actual demand	Failed to activate on demand	Activated on demand but secondary system failed
Ops / Maint procedural control	IM Near Miss	-	-	-	-	-
Process Control System	IMNM if not SRD, PSNM if SRD	IMNM if not SRD, PSNM if SRD	IM event	-	IM event	-
Safety Instrumented System	PS Near miss	PS Near Miss	IM event	IM event	PS Near Miss	-
Relief device	PS Near Miss	PS Near Miss	IM event	PS Near Miss	PS Near Miss	PS Event
Mechanical system	See Below					
Active / Passive Fire Protection	PS Near Miss	PS Near Miss	IM event	PS Event	PS Event	-

Key	PSNM	IMNM	LOPC	SRD
	Process Safety Near Miss	Integrity Management Near Miss	Loss of Primary Containment	Safety Related Device

Mechanical Integrity	Physical damage to containment envelope via impact/event	Error of omission or commission	Gradual degradation of physical condition
Leading to LOPC	PS Event	PS Event	PS Event
Leading to no LOPC	PS Near Miss	PS Near Miss	IM Near Miss

Control Tier: 2

Document Number: AZSPU-HSSE-DOC-00054-2

Revision Date: 06 January, 2011

Print Date: 1 February 2011

**Incident Investigation and Reporting****REVISION/REVIEW LOG**

<b>Revision Date</b>	<b>Authority</b>	<b>Custodian</b>	<b>Revision Details</b>
23 February 2006	Alan McNulty	Abbas Islamov	Initial Issue
09 July 2007	Alan McNulty	Abbas Islamov	<p>The major changes made in the document cover the following areas:</p> <ul style="list-style-type: none"> <li>• Clarity on individual Roles and responsibilities and incident owners based on severity of incident</li> <li>• Process for notification of MIA/HiPo incidents to Group and AzSPU Senior Management</li> <li>• Clarity on the procedure for classification and initiation of DAFWC/HiPo/MIA investigations</li> <li>• Actions setting and prioritization - note change from targets based on prescriptive dates to agreed timescales between actionee and action owner</li> <li>• Approval process - owner and approver is now the same person</li> <li>• Removal of "Spheres of Influence"</li> <li>• Roles and responsibilities</li> <li>• MIA/HiPo notification</li> <li>• Investigation Process</li> <li>• Actions setting and prioritization</li> </ul>
30 April 2008	Alan McNulty	Rufat Mamedov	<p>The major changes made in the document cover the following areas:</p> <ul style="list-style-type: none"> <li>• Tr@ction and MIA/HiPo Database recording requirements</li> <li>• Incident Notification Requirements clarified in Figure 3.1</li> <li>• Included Figure 4.1 "Guidelines to Assess Potential Severity"</li> <li>• Update to figure 4.2 "HiPo determination flowchart" in light of new Group severity matrices</li> <li>• Included section on ABC Analysis</li> <li>• Requirements for AzSPU outside distribution requirements for HiPlus, Lessons Learned one pager and similar documents.</li> <li>• New Comprehensive List of Causes (CLC) Chart</li> <li>• Appendix E renamed to "Definitions" and definitions were updated in light of new BP Group F&amp;CA HSE Definitions and OMS GDPs 44-00-01 and GDPs 44-00-02</li> <li>• new severity matrices</li> <li>• Export PU Internal Notification requirements for illegal taps</li> <li>• Onshore Operations External Notification Requirements</li> </ul>

## Incident Investigation and Reporting

Revision Date	Authority	Custodian	Revision Details
30 April 2009	Yuliy Zaytsev	Rufat Mamedov	<p>The major changes made in the document cover the following areas:</p> <ul style="list-style-type: none"> <li>Added definition of Marine related Incident</li> <li>Added Marine Authority responsibilities</li> <li>Added the requirement to consult BP legal for Level A-E incidents</li> <li>Added the requirement to provide a relief from normal duties for Investigation Team Members</li> <li>Added "Training Requirements and Competence" section</li> <li>Added additional incident notification requirements for Marine related incidents in "Reporting and Notification Requirements" section</li> <li>Removed LOPC from Major Incident definition to reflect that LOPC on itself doesn't constitute Major Incident unless causing MI in "H&amp;S, Environment, Property damage" severity levels</li> <li>Updated HiPo determination chart by removing LOPC box reflecting the above point</li> <li>Added Appendix N, specifying level of investigation required depending on actual severity level</li> <li>Revised HiPo definition</li> <li>Revised minimum requirement for investigation team composition for MIA and HiPo incident</li> <li>Added Appendix O, giving an example of formal incident investigation report</li> </ul>
25 May 2009	Yuliy Zaytsev	Rufat Mamedov	<p>The major changes made in the document cover the following areas:</p> <ul style="list-style-type: none"> <li>Timeline for completing formal incident investigation report - Section 5.11</li> <li>AzSPU specific protocol and process timeline established for development and distribution of LL reports - Section 7</li> </ul>
8 July 2009	Yuliy Zaytsev	Rufat Mamedov	<p>The major changes made in the document cover the following areas:</p> <ul style="list-style-type: none"> <li>Added definition and guidance for "Loss of Primary Containment" (LOPC)</li> <li>Added "Primary Containment" definition</li> <li>Added definition on "Unsafe/Unhealthy condition"</li> <li>Added "Incident Investigation" definition</li> <li>Added Major Incident guidance</li> <li>Added "Process Safety" and "Process Safety incident" definitions</li> <li>Added definition of "Injure/Illness"</li> <li>Added "Occupational Injury" and "Occupational Illness" definitions</li> <li>Revised "Recordable Occupational Illness and Injury" definition</li> <li>Revised "Medical Treatment Case" definition</li> </ul>

## Incident Investigation and Reporting

			<ul style="list-style-type: none"> <li>Added "Equipment /Property Damage" (Incident Direct Cost)</li> <li>Added Business Travel – BP employee and Business Travel – Contractor definition</li> <li>Added another column into the 2.1 table describing information use internally and externally</li> <li>Added definition of an "Explosion"</li> <li>Added definition of "Fire"</li> <li>Added definition for "Severe Vehicle Accident"</li> <li>Added definition on "Uncontrolled Release/Event"</li> </ul>
20 October 2009	Yuliy Zaytsev	Rufat Mamedov	<ul style="list-style-type: none"> <li>Added definition of "IM related incident"</li> </ul>
19 January 2010	Yuliy Zaytsev	Rufat Mamedov	<p>Main reason for the revision was the issue of updated GDP 4.4-0001 and GDP 4.4-0002. Details are:</p> <ul style="list-style-type: none"> <li>Incident notification flowchart has been revised to reflect that all MIA e-mail notifications to the Group relaxed from 8 to 24 hours.</li> <li>Requirement to advise BP legal on any MIA incident and other incidents with possibility of regulatory action or litigation.</li> <li>Requirement not to enter incident into traction if information contained is classified as "BP confidential".</li> <li>"Incident Classification" section has been added.</li> <li>Training requirements for Fatality incident investigation team leader.</li> <li>AzSPU incident distribution lists have been revised.</li> <li>Requirement to notify regional security advisor for MIA and HIPO security incidents which may not be in public domain.</li> <li>Requirement to notify BP regional health director for fatalities resulting from natural causes or self-inflicted.</li> <li>Details on required level of investigation and investigation team make-up.</li> <li>"Guidelines to assess potential severity" (Figure 6.1) has been updated.</li> <li>"HiPo determination flowchart" has been updated.</li> <li>"Storage of records" section has been updated.</li> <li>Severity Matrices and Potential LOPC severity matrices have been updated. "Business Value Loss" severity category has been removed.</li> <li>"Definition" section has been revised.</li> <li>Formats for LL one Pager, CLC chart, MIA/HiPO announcement and RCA investigation report have been removed as appendices. Uploaded to Dk and links provided within the document.</li> </ul>



**Incident Investigation and Reporting**

08 February 2010	Yuliy Zaytsev	Rufat Mamedov	<ul style="list-style-type: none"> <li>Updated incident notification flowchart to reflect notification requirements for BIL MIA/HiPo incidents.</li> <li>Added section on HSSE &amp; Operational Incident Reporting Boundaries</li> <li>Added the requirement to classify incident relatedness to PS, IM, CoW, Driving, Marine, Security when entering incident into Traction</li> <li>Requirement to inter incident relatedness to PS, IM, CoW, Driving, Marine, Security into One Pager LL summary.</li> <li>Requirement to initially report the incident even if in doubt as to whether incident is within reportable boundaries.</li> </ul>
21 June, 2010	Yuliy Zaytsev	Rufat Mamedov	<ul style="list-style-type: none"> <li>Revised and updated R&amp;R as part of Sector Leadership Functional Organisation.</li> <li>Revised "incident owner" section.</li> <li>Clarified drilling related incidents notification requirements.</li> <li>Added Initial Internal Incident Notification form as Appendix K.</li> <li>Updated Reference Section.</li> <li>Slight update to section "HSE &amp; Operational Incident Reporting Boundaries".</li> </ul>
17 September, 2010	Yuliy Zaytsev	Rufat Mamedov	<ul style="list-style-type: none"> <li>Added requirement to mark the formal RCA investigation report as "Draft" or "Final" to ensure only action from final report are entered into traction.</li> </ul>
08 October, 2010	Yuliy Zaytsev	Rufat Mamedov	<ul style="list-style-type: none"> <li>Slight change to section 9 to bring more clarity on investigation reports retention schedule.</li> </ul>
6 December, 2010	Yuliy Zaytsev	Rufat Mamedov	<ul style="list-style-type: none"> <li>Added Appendix L for "Guidance on use of DROPS Calculator and Dropped Object HiPo determination".</li> <li>Added Figure 10.2 to Section 10 to bring clarity on BP Operational Boundaries for AzSPU.</li> <li>Added AzSPU Entity Aviation Authority (EAA) roles and responsibilities and expanded Logistic Manager responsibility to notify EAA on aviation related incidents.</li> <li>Section 1.2 was updated to ensure that all drilling and well operations safety and integrity management accidents, incidents and significant near misses are investigated.</li> <li>Added Process Safety Incident Classification Guidance as Appendix M.</li> </ul>