



DNZ

HS10-01 Management of Change

Relating to Standard: HS10 Management of Change

December 2018

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1 Background and Purpose

This procedure describes the process for ensuring significant business changes are planned, consulted on and assessed for their effect on health and safety (H&S) risk. It includes, but is not limited to changes of materials, equipment, process or organisational structure that may affect the capability for DNZ to operate effectively. The focus for management of change (MOC) is on DNZ critical risk processes and activities.

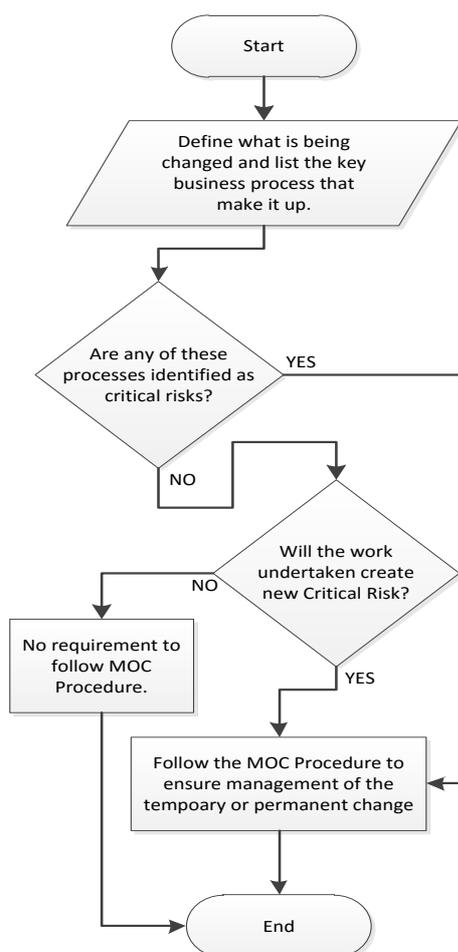
This procedure relates to the DNZ standard as described in HS10.

2 Scope

This procedure applies to all DNZ divisions and facilities that are undertaking changes that affect the identified critical risks and their controls. It should be used in conjunction with the Critical Risk and Hazard Management Procedure HS03-01.

3 Procedure

3.1 Is MOC required



The flowchart to the left is used to determine if MOC is required. Given MOC is to be used where DNZ is making decisions that impact on, or introduce, elements of Critical Risk, this is an important step, and due consideration in making this decision is required.

Use the flowchart to the left to support making the decision about whether MOC is required.

This process should be used for both long term and short change and the decision making process documented.

It is suggested that for both temporary and permanent changes the key business processes are documented into a table that allows for an assessment to be completed. If it is determined that MOC is required, this document forms the basis of completing that change.

It is recommended to use this procedure for any significant change project.

Anyone using this procedure, who is unsure of the need to apply MOC, should seek guidance from the Group Manager – Health and Safety.

Figure 1. MOC Requirement

3.2 MOC process

Overview of MOC process

Changes to our facilities, equipment or control processes, especially where these impact our Critical Risk processes, require strong control over change. In particular, it requires identifying potential new causes of harm that could be introduced, and where current Critical Controls could be impacted. The process to be followed is as shown below.

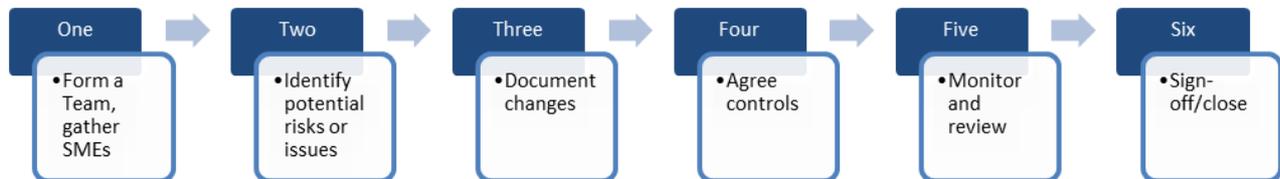


Figure 2. Critical Risk Control of Change

Identify stakeholders and subject matter experts (SME)

The MOC process will be managed by the project manager or relevant person accountable for managing the change. They will be responsible for ensuring consultation is undertaken, and identifying who the key stakeholders are for involvement in the consultation process. Those chosen for consultation must be capable of providing a broad perspective on the change being considered and include independent (of the work area) advice. This could be the Health and Safety advisor, other SME or relevant independent reviewer.

Documentation of Proposed Change

The consultation group will:

- Review the proposed changes in detail using available documentation such as plans, change schedules, drawings etc.
- Identify potential hazards and risks
- Agree and document interim controls and action plans associated with the change including the length of time temporary changes to critical risk controls will be in place.
- Develop processes for monitoring adherence to the action plans and temporary changes.

Once defined, the proposed changes must include authorisation by the divisional and departmental manager accountable for the change. In authorising they are providing assurance that the following documentation/changes to the following documentation are included as part of the process (not all will be applicable for all MOC):

- H&S documentation;
- Training and communication plans;
- Critical Controls – with reference to Bow Ties or other control plans;
- Changes for the operating procedures;
- Maintenance procedures including preventative maintenance schedules;
- Inspection, testing and certification of any applicable equipment – e.g. electrical, pressure vessels;
- Pre-start-up/change inspection to ensure changes have been made correctly and acknowledged by impacted stakeholders;
- Duration (if a temporary change); and
- Approvals (from impacted departments/person(s)).

Implementation of changes

Changes must be implemented as documented and agreed with controls and written procedures to manage changes (except for “replacements in kind”).

These written procedures must ensure that the following considerations are addressed from a health and safety perspective prior to any change:

- Ensure there is knowledge and understanding of the purpose of the proposed change;
- Impacted stakeholders;
- Impacted processes and controls;
- Modifications to operating procedures;
- Necessary time period for the change; and
- Authorisation requirements for the proposed change.

All workers who operate a process, or part of a process that will be affected by change, or whose job tasks will be affected by change, must be informed of, and trained in, the change prior to start-up. If a change is covered by a standard operating procedure or practice, the required safety information must be updated accordingly.

Temporary or Permanent Change

All significant changes that have the potential to alter a critical risk must go through a MOC process. This is to ensure that even temporary changes return to their pre-change state rather than becoming a permanent change without being fully assessed for impact on people and process.

For the purposes of this document, changes that are intended to revert to pre-change state within 90 days are defined as Temporary Changes.

Record keeping for MOC

A permanent record must be kept for seven years by the division or department undertaking the change. The record can be kept within the overall project documentation, or if it is not covered by a project, the person accountable for the change must ensure such a record is stored. It should be filed clearly in a location associated with the management procedures for the area where the change has occurred.

Complex or design change

For complex change or significant design change, a hazard evaluation procedure (HAZOP) with approvals by the different operational, maintenance, and safety support personnel shall be undertaken. This process should be facilitated by a trained HAZOP facilitator.

Changes in planning documents, technical specifications, raw materials, operating procedures, mechanical integrity programs, including electrical classifications are to be noted so that these revisions can be made permanent when the drawings and procedure manuals are updated. Copies of process changes must be kept in an accessible location to ensure that design changes are available to operating personnel.

4 Responsibilities

Divisional Managers

- Accountable for supporting and resourcing appropriate resources to support the activities of change management processes and for the authorisation of change.
- Accountable for ensuring that the MOC processes are understood and effectively implemented.

Project Managers

- Ensures this procedure is followed when undertaking change associated with existing critical risk or its controls, or if introducing potential critical risk into the business.
- Ensures appropriate resources are allocated to achieve and maintain compliance to MOC for critical risk processes.

Group Health and Safety

- Accountable for driving a culture for MOC for Critical Risk processes in their respective businesses.
- Must coach and mentor project or accountable managers in the MOC process.
- H&S Managers/Advisors are to provide support as SME's when required and provide support for MOC to line managers.
- Group Health and Safety is accountable for ensuring that MOC for Critical Risk processes are audited appropriately

Workers

- Be part of MOC stakeholder groups as required.

Actively participate in MOC processes and contribute to ensure all relative safety consideration is given to the changes being made.

5 Other Information

- H&S Definitions (HS01-01-01).
- Full table of Procedures (HS01-01-02).
- Change Management Standard (HS10).
- Risk and Hazard Management Standard and Procedure (HS04 and HS4-01).

6 Document Control

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