Global experience

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Consistent high quality database and guidelines

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The oil & gas exploration and production industry recognises the need to develop consistent databases and records in certain fields. The OGP’s members are encouraged to use the guidelines as a starting point for their operations or to supplement their own policies and regulations which may apply locally.

Internationally recognised source of industry information

Many of our guidelines have been recognised and used by international authorities and safety and environmental bodies. Requests come from governments and non-government organisations around the world as well as from non-member companies.

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Acknowledgements

This document was produced by the OGP Safety Data Sub-committee

OGP Life–Saving Rules

Report No: 459
April 2013 (Version 2)

Acknowledgements

This document was produced by the OGP Safety Data Sub-committee

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<td>April 2013</td>
<td>Amendments to safety icon designs</td>
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<tr>
<td>2</td>
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Introduction

This document provides a set of life-saving rules which can be used in the oil & gas industry to mitigate risk and reduce fatalities. Member companies recognise the value of providing clear, simple and consistent communication regarding risks in the workplace and the proper use of barriers and safeguards to protect the workforce. Each OGP Life-Saving Rule in this document consists of a simple icon and descriptive text, with additional detailed guidance to explain why the Rule is important and what aspects workers and supervisors should focus on. Each Rule is also linked to controls and barriers which, if used properly, can prevent or avoid fatal incidents.

The OGP Life-Saving Rules are intended to supplement and support existing company management systems, programmes and policies. The Rules focus on modifying worker and supervisor behaviours in the workplace by raising awareness of activities which are most likely to result in fatalities. They also highlight simple actions individuals can take to protect themselves and others.

While member companies can benefit from implementing their own programmes, there is a larger potential benefit to be realised in standardising life-saving rules across the industry. Contractor employees are required to learn different rules and procedures for each client, even though the operating practices and risks are essentially the same. Migrating toward a standard set of industry life-saving rules will improve understanding and compliance, particularly in multi-language and multi-cultural settings, with the aim of reducing serious incidents and fatalities. It is recommended that:

- Companies without life-saving rules should consider adoption of these OGP Life-Saving Rules.
- Companies who already have equivalent rules should, at the next revision cycle, consider adoption of or alignment with the OGP Life-Saving Rules.
- Companies actively support their (sub) contractors in implementing the OGP Life-Saving Rules.

This document also provides guidance on roll out approaches that can be used to effectively communicate and implement these Rules.
2  The OGP Life-Saving Rules

Table 1 contains the eight OGP Core Life-Saving Rules which are most applicable to the oil & gas industry. Table 2 contains ten OGP Supplementary Life-Saving Rules which many companies may find applicable depending on their risk profile.

Table 1: OGP Core Life-Saving Rules

<table>
<thead>
<tr>
<th>Icon &amp; primary text</th>
<th>Additional guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Obtain authorisation before entering a confined space</td>
<td>A confined space, such as a vessel, tank or pipe can contain explosive gas, poisonous air or other dangers such as a lack of oxygen, things that can fall on you or you can fall from. Authorised access keeps you safe. You should: • confirm with the supervisor or the person in charge of the work that it is safe to start work • confirm with the attendant that you can enter a confined space • follow the requirements of the work permit If you are an attendant you should: • approve and control access to a confined space • have means of communication with people in the confined space If you are the supervisor or person in charge of the work you should: • confirm that the requirements of the work permit are in place • confirm that a qualified attendant is always present when people are in a confined space • confirm that gas testing is carried out as per work permit • confirm that it is safe to start work</td>
</tr>
<tr>
<td>Protect yourself against a fall when working at height</td>
<td>Use full protection equipment when working outside a protective environment where you can fall over 1.8 meters (6 feet) to keep you safe. A protective environment includes approved scaffolds, stairs with handrails, and man lifts. You should: • have authorisation to work at height outside a protective environment • be aware of what fall protection equipment to use and how to use it • check equipment before using it • always tie off when at height outside of a protective environment If you are the supervisor or person in charge of the work you should: • confirm that it is safe to start work at height</td>
</tr>
<tr>
<td>Do not walk under a suspended load</td>
<td>Working or walking immediately under a suspended load is unsafe as the load can fall on you. A suspended load is an object that is temporary lifted and hangs above the ground (rig floors are excluded from this rule). You should: • never cross a barrier controlling an area with a suspended load without authorisation • follow the instructions of the flagman or the person in charge of the lift If you are the person in charge of the lift you should: • mark the unsafe area and put barriers in place • ensure that nobody walks under a suspended load</td>
</tr>
<tr>
<td>Wear your seat belt</td>
<td>A seat belt protects you from injury in the event of an incident while driving and keeps you safe. Wearing seat belts includes safety belts in (rental) cars, taxis, (mini) buses, trucks, cranes, or forklift trucks, and involves persons in moving vehicles when engaged on company business.† Exceptions include vehicles where only lap seatbelts are available or in public transport where seat belts are not available. You (drivers and passengers) should: • always use a 3-point seatbelt (please note exceptions† above) • check that your seat belt works properly • keep your seat belt properly fastened while in a moving vehicle • check that everyone in the vehicle is wearing a seat belt properly before starting to drive • intervene when your fellow passengers are not wearing seatbelts properly</td>
</tr>
<tr>
<td>Icon &amp; primary text</td>
<td>Additional guidance</td>
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</table>
| **While driving, do not use your phone and do not exceed speed limits** | Speeding or using your phone while driving increases the risk of losing control of your vehicle.  
If you are a driver, you should while driving:  
• not use a mobile phone or pager, send or read a text message, or use a hands-free mobile phone device  
• stay at or below the maximum allowable speed for the road you are driving on as indicated by road signs or journey management instructions  
• stay at or below the maximum allowable speed for the vehicle you are driving  
• adjust your speed to the prevailing conditions  
If you are a passenger you should:  
• intervene if a driver is using a phone in a moving vehicle  
• intervene if a driver is exceeding the maximum allowable speed |

| **Follow prescribed journey management plan** | A journey management plan is a plan for you as a driver that will help you to travel and arrive safely.  
If you are a driver you should:  
• confirm if a journey management plan is required before starting the journey  
• discuss the journey management plan with the authorised person  
• understand the journey management plan before starting the journey  
• comply with the duty, driving and rest hours specified in the journey management plan  
• follow the route specified in the journey management plan  
• tell the authorised person immediately if changes occur  
If you are the supervisor or person in charge you should routinely:  
• check that the journey management plan is in place and is being followed  
• check that the driver understands and complies to the journey management plan |

| **Work with a valid work permit when required** | A work permit describes what you must do to stay safe.  
You should:  
• understand the work permit and follow it  
• confirm that the work permit is valid  
• confirm with the supervisor or the person in charge of the work that it is safe to start work  
If you are the supervisor or person in charge of the work you should:  
• confirm if a work permit is required for this work.  
• confirm that the workplace has been inspected before work starts  
• explain how the work permit keeps you safe  
• confirm the work permit is signed  
• confirm that it is safe to start work.  
• get a new work permit when the work or the situation changes  
• confirm that the work is completed |

| **Verify isolation before work begins and use the specified life protecting equipment** | Isolation separates you from danger, such as electricity, pressure, toxic materials, poisonous gas, chemicals, hot liquids or radiation to keep you safe. Specified life-protecting equipment by the work permit, such as breathing apparatus, electrical arc flash protection or chemical resistant suits protect you from danger.  
You should:  
• understand the isolations that protect you from danger  
• confirm with the supervisor or the person in charge of the work that isolations are in place  
• confirm with the supervisor or the person in charge of the work it is safe to start work  
If you are the supervisor or person in charge of the work you should:  
• confirm isolation is in place, for example, lock switches, separate pipes with spades, or lock access doors  
• confirm no stored energy or other dangers remain  
• confirm that it is safe to start work |
Table 2: OGP Supplementary Life-Saving Rules

<table>
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<tr>
<th>Icon &amp; primary text</th>
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<tr>
<td>Prevent dropped objects</td>
<td>There is a significant risk of dropped objects when using tools and portable equipment at height. Preventing objects from falling keeps you and people working below you safe. You should: • secure all tools and equipment to prevent them from falling/being dropped • put barriers around areas where there is a potential for dropped objects • always wear head protection where required If you are the supervisor or person in charge of the work you should: • create awareness of the risk of dropped objects and understanding of what actions need to be taken (for example during team/toolbox meetings) • regularly inspect the site to ensure that precautions are taken to prevent objects from falling from height (e.g. hand tools are tied off, no loose objects, no holes in grating, toe boards are in place, barriers are in place where necessary, head protection is worn where required, etc.)</td>
</tr>
<tr>
<td>Position yourself in a safe zone in relation to moving and energised equipment</td>
<td>Working “in the line of fire” of moving equipment (e.g. cranes and other vehicles) and energised equipment (e.g. rotating, electrical or pressurised machinery) is unsafe as this can impact you. You should • confirm the safety precautions with the supervisor or the person in charge of the work when working near moving or energised equipment • follow the instructions of the flagman or the person in charge for equipment movements • confirm with the person in charge that it is safe to enter and/or work in the restricted zone • make sure that the driver of a moving vehicle sees you If you are the supervisor or person in charge of the work you should: • confirm that access to areas posing danger is restricted and that barriers are put in place • ensure that only authorised personnel is working in a restricted zone • confirm that signaling methods and communications are agreed on and understood by everyone • ensure that the site is properly lit and/or that high-visibility clothing is worn</td>
</tr>
<tr>
<td>Obtain authorisation before starting excavation activities</td>
<td>Obtain authorisation before starting excavation activities. Excavation activities may contain hazards such as electrical cables, confined space, collapse of walls or excavated material. Check that it is safe to start work. An excavation is any man-made cut, cavity, trench, or depression, formed by earth removal (e.g. digging). You should • confirm with the supervisor or person in charge that it is safe to start work • follow applicable work permit requirements • stop work and notify your supervisor if anything unexpected happens If you are the supervisor or person in charge of the work you should confirm: • all work permit requirements are in place (e.g. confined space, isolation) • barriers and signs are in place to restrict access to excavation sites • a work site risk assessment has been conducted by a competent person(s) including: identified hazards e.g. cable/pipeline route marking; soil classification and testing • soil movement is controlled to prevent collapse (e.g. shoring, sloping, soil placement) • ground stability is inspected before work and after adverse weather conditions • an emergency response plan is in place</td>
</tr>
<tr>
<td>Conduct gas tests when required</td>
<td>Air is tested to stop explosions and/or make sure you can breathe the air safely. You should • confirm with the supervisor or the person in charge of the work that the air is tested • confirm with the supervisor or the person in charge of the work it is safe to start work • stop work if you smell gas If you are a gas tester you should: • understand which tests the work permit requires and how often • use certified equipment for the tests If you are the supervisor or person in charge of the work you should: • confirm that gas testing is carried out as per work permit • request more gas tests if necessary • confirm that it is safe to start work</td>
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<tr>
<td>Wear a personal flotation device when required</td>
<td>Personal flotation devices should always be worn when there is a danger of falling into water. When working near or on water, wearing a personal flotation device (e.g. life jackets or buoyancy aids) protects you from drowning. You should • understand when it is required to wear a personal flotation device • always wear a personal flotation device when required • wear the personal flotation device properly and as intended (e.g. correct size, tied where required, etc.) • check whether the personal flotation device is working properly and not damaged before use If you are the supervisor or person in charge of the work you should: • based on a risk assessment, confirm when and where a personal flotation device must be used and ensure your team is aware of this • ensure that personal flotation devices are regularly inspected</td>
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<td>Icon &amp; primary text</td>
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| Do not work under or near overhead electric power lines | **Working with equipment immediately under or near overhead lines is unsafe as an electrical current or flashover can kill you.**  
**Maintain adequate distance to keep you safe.**  
Be aware that a flashover can happen if you work within the clearance distance (e.g. 7 meters for a 275kV line), even if you do not touch an overhead line.  
**You should:**  
- never work with equipment under or near overhead lines unless authorised to do so by your supervisor  
- not allow work under or near life overhead lines unless precautions have been taken. Examples of precautions: power lines are electrically switched off/isolated; work is outside the unsafe/clearance distance; barriers are set to mark the clearance distance; and/or safe passageways are created  
- not allow equipment (e.g. cranes, tipping trucks, ground moving equipment, mobile weather towers) within the clearance distance of the overhead power lines  
- confirm that the correct precautions have been taken and that it is safe to start work |
| No alcohol or drugs while working or driving | **Using alcohol or illegal drugs, or misusing legal drugs or other substances, will reduce your ability to do your job safely.**  
**You should:**  
- always inform the supervisor or the person in charge if you are taking medicine that may have an effect on your performance  
- if in doubt always check with your supervisor or the person in charge who may seek medical advice  
- not use, keep, sell or distribute illegal drugs  
- intervene if you see a case of alcohol or drugs abuse |
| Do not smoke outside designated smoking areas | **Smoking or use of matches or cigarette lighters could set on fire flammable materials. Designated smoking areas, such as a smoking hut or a smoking room, will keep you safe from causing fire and explosion.**  
**You should:**  
- know where the designated smoking areas are  
- intervene if you see someone smoking outside a designated area |
| Follow prescribed lift plan | **A lift plan describes how to lift and hoist safely. For routine lifts, there needs to be a general lift plan. For non-routine lifts, including complex and heavy lifts, the plan is specific.**  
Lifting equipment operators should:  
- understand the lift plan before starting the work and follow it  
- confirm that the load does not exceed the capacity of the lifting equipment  
- confirm that the crane is level and positioned on a solid surface  
- verify that safety devices on lifting equipment are installed and operational  
**If you are the supervisor or person in charge of the work you should:**  
- confirm that a general or specific lift plan is in place, depending on the type of lift  
- confirm that the crane operator understands and complies with the lift plan  
- confirm that people who supervise or perform lifting operations and who inspect and maintain lifting equipment are trained and competent  
- verify that equipment to be used for lifting and hoisting has been inspected, maintained and certified  
- confirm that the signaling methods and communications are agreed and clear |
| Obtain authorisation before overriding or disabling safety critical equipment | **Safety-critical equipment must work correctly to keep you safe.**  
Examples of safety-critical equipment include isolation devices/emergency shut down valves, lock out/tag out devices trip systems, relief valves, fire and gas alarm systems, certain level controls, alarms, crane computers, in-vehicle monitoring systems.  
**You should:**  
- obtain authorisation from the supervisor or person in charge before overriding or disabling safety-critical equipment  
- point out the safety-critical equipment in your work place  
- confirm the authorisation comes from the right level  
**If you are the supervisor or person in charge of the work you should:**
3 Implementing the OGP Life-Saving Rules

It is recommended that companies working in the oil & gas industry adopt the OGP Life-Saving Rules. Analysis of 1,484 fatal incidents reported by OGP member companies over the last twenty years indicates that adoption, conformance and enforcement of these simple Rules may have prevented many of these fatalities. Each company should consider their operations, activities and high potential event history to determine which Rules will be most effective in reducing risk.

Companies implementing the rules should, at a minimum, adopt the eight OGP Core Life-Saving Rules that correspond to 40% of historical fatal incidents reported to OGP. Supplementary Rules can be selected to address particular risk exposure of the implementing organisation.

OGP member companies should actively support their (sub) contractors in implementing the OGP Life-Saving Rules. This standardisation will simplify training and aid compliance and intervention.

It is important that the Rules are communicated to all workers, preferably as part of each new worker induction, safety awareness campaign, pre-job discussion, etc.

3.1 Fundamental requirements

There are some fundamental requirements that an organisation needs to have in place to ensure the effective implementation of the OGP Life-Saving Rules:

- Work will not be conducted without a pre-job risk assessment and a safety discussion, such as a toolbox talk, appropriate for the level of risk.
- All personnel will be trained and competent for the work they conduct.
- Personal protective equipment will be provided and worn in accordance with the requirements identified by the risk assessment and work-site policies.
- Emergency response plans, developed from a review of potential emergency scenarios, will be in place with suitable and sufficient resources available, before commencement of work.
- Everyone is authorised to stop work if they are in doubt about the safety of an activity.
- Peer to peer interventions should be encouraged with regard to compliance with the OGP Life-Saving Rules.
The OGP Life-Saving Rules can be grouped into four broad categories.

### 3.1.1 Personal safety

The implementing company is required to ensure that the necessary personnel, training, equipment and resources have been provided in order to support the effective implementation of the OGP Life-Saving Rules associated with personal safety.

### 3.1.2 Driving

There is an OGP recommended practice on land transportation that addresses both journey management and personal safety requirements. This material should be helpful to organisations implementing the OGP Life Saving Rules related to driving. It can be downloaded from the OGP website:

- Land transportation safety recommended practice, OGP Report № 365

### 3.1.3 Site safety

The Life-Saving Rules related to site safety require the implementing company to clearly state the requirements for each of the Rules they have selected, examples include:

- designation of authorised smoking areas
- safe working distances from overhead power lines
- Substance misuse: a guide for managers & supervisors in the oil & gas industry, OGP/IPIECA Report № 445

### 3.1.4 Control of work

OGP has previously produced guidance pertaining to control of work which would be worth consulting for organisations implementing Rules in this category. The material can be downloaded from the OGP website:

- Guidelines on permit to work systems, OGP Report № 189
- Lifting & hoisting safety recommended practice, OGP Report № 376

### 3.1.5 Authority to stop work

All members of the workforce should understand that they have the responsibility and authority to intervene and stop work if they observe potential or actual non-compliance to these Rules or indeed any other unsafe activity. The intent is to create a safe working environment for everyone. Companies should promote the development of a culture that encourages individuals to intervene and that only allows work to be carried out when there is compliance with the Rules/zero tolerance for non compliance. Proactive intervention may be the last opportunity to prevent a serious injury or fatality. If rule breaking occurs, workers should know that they must notify their supervisor or the person in charge of the work activity (or higher level management) immediately.
3.2 Life-Saving Rules implementation resources

OGP has provided a package of materials to assist companies in the roll-out and implementation of the OGP Life-Saving Rules, please visit: http://www.ogp.org.uk/publications/life-saving-rules.

The *Life-Saving Rules User Agreement* (inside cover) states the conditions under which the Life-Saving Rules icons and accompanying wording is made available.

The materials available at time of publication of this report are:

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<th>Audience/Purpose</th>
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<td>– For signage and other communication needs</td>
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<tr>
<td>459.2</td>
<td>Zip folder</td>
<td>eps &amp; jpg files of Supplementary Rules</td>
<td>– For signage and other communication needs</td>
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<td>Work cards</td>
<td>18 x individual work cards (one for each rule)</td>
<td>– To hand out to company and contractor employees</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>– Adaptable for use in signage and other communication needs</td>
</tr>
<tr>
<td>459.4</td>
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<td>Poster showing all 18 Rules</td>
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<td>Presentation</td>
<td>Guidance to clarify the rules</td>
<td>– Presentation describing each Rule</td>
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<td>Presentation</td>
<td>Leadership engagement</td>
<td>– <strong>Audience</strong>: Leaders in companies</td>
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<tr>
<td>459.6b</td>
<td>Presentation</td>
<td>Contractor leadership engagement</td>
<td>– <strong>Audience</strong>: Leaders in contractor companies</td>
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<td>Presentation</td>
<td>Induction slide pack</td>
<td>– <strong>Audience</strong>: Company and contractor employees</td>
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<td>459.7b</td>
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<td>Speaker support pack for induction slides</td>
<td>– <strong>Audience</strong>: Those who will give the instruction</td>
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<td>A3 note pad for use during toolbox talk sessions</td>
<td>– For use during Tollbox talks. Front page has instructions/question for the speakers, remaining pages are 'tear-away' for use with question 3</td>
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<td>– <strong>Audience</strong>: Leaders who deliver toolbox talk sessions</td>
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<td>Posters</td>
<td>A3 posters of the Core Rules</td>
<td>– Intended for use during Toolbox talks, but also applicable in other situations</td>
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<td>Data Tables</td>
<td>Supporting data on the applicability of the OGP Life-Saving Rules to historical OGP reported fatal incidents and high potential events.</td>
<td>– <strong>Audience</strong>: Company representatives tasked with selecting appropriate life-saving rules for their organisation.</td>
</tr>
</tbody>
</table>
3.3 Lessons learned in rules implementation

OGP Life-Saving Rules should be rolled out as a project with the commitment of senior management. Based on the experience of OGP member companies that have implemented life-saving rules, it is recommended that the following steps are taken:

- Conduct a risk assessment of your organisation’s activities and review historical data related to fatalities and high potential events within your own organisation. Compare the rules to the risk profile of your organisation and select life-saving rules for initial implementation. This should include the eight Core Rules and some Supplementary Rules that address specific risks in your organisation.
- Develop a business case/change management programme and discuss with management to ensure commitment to implement the selected set of rules.
- Adopt the set of Core Rules (unless your risk assessment suggests otherwise) and select Supplementary Rules as applicable.
- Develop a communications and roll-out plan for the implementation of the chosen Rules (stakeholder mapping, communications plan, accountability and compliance strategy in consultation with legal and human resources).
- Develop performance monitoring metrics (KPIs) to determine the level of effective implementation of the Rules (e.g. percentage of training conducted, monitoring of rule breaking, review of lagging indicator metrics, workplace behaviour modification).
- Customise OGP roll-out materials such as the leadership and contractor engagement employee packs.
- Monitor performance and report to management with improvement opportunities.
- Review organisational data to determine if additional Rules are required.

Appendix B contains a case study on the implementation of life saving rules at an OGP member company.

3.3.1 What is important for leaders

It is important for leaders to know that:

- the OGP Core and Supplementary Life-Saving Rules are linked to the prevention of a majority of fatal incidents reported to OGP
- OGP advises the adoption of a set of Core Life-Saving Rules. Member companies can add selected Supplementary Rules to fit their risk profile
- it is good practice to start with a set of Rules to get 100% compliance and develop a culture of ‘this is the way we work’
- leaders show their commitment by monitoring compliance and showing zero tolerance for non-compliance
- supervisors/leaders create work conditions so that workers can comply.

3.3.2 What is important for workers

It is important for workers to know:

- the meaning of the Rules
- that compliance is mandatory since non compliance can result in a fatality
- that Life-Saving Rules describe actions for the individual that may be the last barrier to prevent a fatality
- that the Rules enable workers to discuss worksite risks with their supervisors and gives them the authority to stop work.
3.3.3 Accountability and disciplinary policies

Experience from member companies suggests that for a life-saving rules programme to be successful there must be accountability for compliance with the rules and consequences for rule breaking or wilful violations at all levels throughout the organisation. It is critical that leaders drive toward a 100% compliance culture. Although this document does not provide a specific accountability and disciplinary model, the following key points should be considered:

1 The life-saving rules are for everyone

The intention is to keep everyone safe by ensuring everyone follows the same life-saving rules. The OGP Life-Saving Rules focus on activities with the greatest potential for serious injuries or fatalities. In those situations, the message to workers should be “if you choose to break the life-saving rule, you choose not to work here”.

2 Avoid the perception that the company is looking to dismiss workers

A frequently asked question is: ‘isn’t disciplinary action against someone a bit extreme for breaking a life-saving rule?’ The commitment to implement life-saving rules is to protect people. Companies can invest a lot of effort in making sure people know the rules. It is better to take disciplinary action than to allow people to take risks that could result in them hurting or killing themselves or others.

3 Take action any time the life-saving rules are broken

Disciplinary action should follow once an investigation has proven a life-saving rule has been broken, not only when an incident with actual consequences has occurred. Following a thorough investigation, disciplinary action should take into account the risk taken and local employment laws. The intent is to apply consistent disciplinary action that is appropriate to each situation.

4 Encourage open reporting

Stress to personnel that by not reporting rule breaking they choose to make the workplace a more hazardous place for themselves, colleagues and friends. Positively reinforce an open reporting culture and respond appropriately where cases of ‘non-reporting’ are found.

3.4 Continuous improvement

Initial introduction of life-saving rules to the workforce is not enough. A continuous effort is required to drive 100% compliance. Monitoring of life-saving rule breaking will enable identification of which rules need further reinforcement, or where controls or work conditions need to be revised to help workers comply. A number of tools exist to continuously improve compliance to the life-saving rules, for example:

- ‘mini’ campaigns, to raise awareness
- retraining of employees and workers
- site visits of leaders
- regular reporting on rule breaking and its causes to management
Appendix A  Background and supporting data

Historical data review

OGP reported incident data shows that Lost Time Injury Frequency Rates (LTIF) and Total Recordable Injury Rates (TRIR) have decreased significantly over the last 10 years, as shown in Figures 1 and 2.

OGP reported Fatal Accident Rates (FAR) for the same time frame show similar declines at first, but then a slower rate of improvement over the last four years (2007-2010), as shown in Figure 3.

This raises the concern that while, as an industry, we may be getting better at preventing more frequent, less serious incidents, we have not been as successful at reducing the rate of less frequent, more serious incidents.

Note: Of the 90-100 fatalities reported to OGP each year, generally in excess of 70% involved contractor personnel.
OGP fatal incident and high potential event workshop

Considering the plateau in fatalities and the large percentage of contractor personnel involved, the OGP Safety Data Sub-Committee (SDSC) sponsored a two day workshop in January 2010. The objective of the workshop was to focus specifically on causes and prevention offatal incidents and high potential events in the upstream oil & gas industry. The workshop resulted in recommendations to the OGP Safety Committee on actions that could be taken to prevent future fatal incidents and high potential events. The workshop involved 38 participants representing 26 OGP member and associate member companies and 3 industry trade associations, participants covered a wide geographical area. Over the two days of the workshop the attendees were provided with information from OGP data along with member company experiences in the form of both presentations and a knowledge sharing session. This information was used to set the scene for a series of interactive workshop sessions and panel discussions.

A study was presented on all the fatal incidents from 2005 to 2008 which had been reported by OGP member companies. The publicly available data had been reviewed for trends related to cause and the use of protective barriers. Some 332 workplace related fatal incidents were analysed, resulting in the following conclusions:

- 83% of threats associated with fatalities analysed were human factors related
- process safety hazards represented only 16% of the fatalities
- skill-based errors were reducing while rule-based errors were increasing
- recommendations were generally aligned with identified inadequate control measures
- the inadequacy of procedural control measures was increasing dramatically. Especially project specific planning and procedures needed to be addressed.

The OGP data study and several other presentations given by representatives of member companies indicated that there were common trends in the causal factors of fatal incidents. The workshop participants concluded that there would be value in having OGP pursue the development of a set of standardised industry life-saving rules. It was agreed that the rules should:

- use simple, standardised icon and descriptive text
- focus on workplace hazards that are most likely to contribute to fatal incidents
- build on existing OGP data studies, member companies’ experience, and good practices in other industries
- be used by member companies to build new life-saving rule programmes or enhance existing programmes.

Based on the outcomes of the workshop, two SDSC task forces were formed to work on two key deliverables:

- define, analyse and report on ‘causal factors’ for fatal incidents and high potential events
- the development of an appropriate set of recommended life-saving rules

A standardised list of ‘causal factors’ were developed and approved by the OGP Safety Committee for inclusion in the 2010 OGP request for safety data. The resulting information has been published in Safety performance indicators – 2010 data, OGP Report № 455.

Development of OGP Life-Saving Rules

Two approaches were taken in the development of the OGP Life-Saving Rules; the first was an analysis of OGP reported data and the second was to learn from and ensure alignment with member companies that had already developed rules.
OGP data analysis

The OGP Life-Saving Rules development group conducted a comprehensive review of the data reported to OGP from 1991 to 2010 (inclusive) for fatal incidents and from 2000 to 2010 (inclusive) for high potential events. As the classifications of incidents and events had changed over this time period, the incident descriptions submitted to OGP were also reviewed and reclassified according to the current definitions, as listed below.

### Category of event
- Assault or Violent Act
- Caught In, Under or Between
- Confined Space
- Cut, Puncture, Scrape
- Exposure Electrical
- Exposure: Noise, Chemical, Biological, Vibration
- Explosions or burns
- Falls from height
- Overexertion/Strain
- Pressure Release
- Slips and Trips (at the same height)
- Struck By
- Water Related, Drowning
- Other

### Type of activity
- Construction, Commissioning, Decommissioning
- Diving, Subsea, ROV
- Drilling, Workover, Well Services
- Lifting, Crane, Rigging, Deck operations
- Maintenance, Inspection, Testing
- Office, Warehouse, Accommodation, Catering
- Production Operations – includes normal, start-up or shut-down operations
- Seismic/Survey operations
- Transport – Air
- Transport – Land
- Transport – Water, including Marine Activity
- Unspecified – Other

The results of the review indicated common situations where compliance to simple rules could have avoided fatal incidents. This information was used to determine a list of potential rules most relevant to the industry.

A second review of the historical data was then undertaken to ensure the life-saving rules selected corresponded to the acceptance criteria (as determined by the outcome of the workshop), which were:

- Identify eight core rules that apply to at least 40% of OGP reported fatal incidents
- Identify a larger set of additional rules that apply to at least 60% of OGP reported fatal incidents
- Each rule had to include a simple icon and descriptive text
- Each rule had to be applicable to individual workers and supervisors, encouraging personal accountability and enabling disciplinary action to be taken at the discretion of the implementing organisation.

The results of this second review indicated that failure to follow at least one of the full set of 18 life-saving rules described in this document was a contributing factor in 70% of the 1,484 fatal incidents analysed and 48% of the 1,173 high potential events.

The results show that the aim of having the eight OGP Core Rules applicable to at least 40% of the OGP reported fatalities has been met.
OGP Member company rules

One member company which implemented a set of life-saving rules in 2009 has seen significant decreases in serious incident rates and fatality incident rates which they attribute in part to the new life-saving rules programme. This is consistent with experience reported by other member companies.

OGP member companies were asked to submit examples of similar industry rules already in use. These were compared and common themes in graphics, text and implementation approaches were identified.

Information was submitted by fourteen companies that had developed their own safety rules. The number of rules varied from 4 to 13 per company, with an average of 10 rules per company. The subject matter of the rules was reviewed to determine the most common themes covered. The most common subjects included (by percentage of companies that covered the subject matter):

- permit to work – 86%
- journey management – 86%
- mechanical lifting – 71%
- working at height – 71%
- energy isolation – 57%
- confined space entry 50%
- excavation (ground disturbance) – 36%

There were a further 31 hazards which had been addressed by a rule. As the OGP Rules were intended to focus on issues that were most likely to result in a fatality, a review of additional rules in conjunction with the OGP historical data indicated the following should also be considered:

- hazardous gas – 21%
- alcohol /drugs – 14%
- smoking – 14%

The detailed text associated with each of the rules was also reviewed to determine common requirements. Some of the member company rules had been written in such a way as to allow disciplinary action to be taken in the event of a rule not having been complied with; other companies had written their rules in a different style. A decision was taken to ensure that the OGP Rules could be used in conjunction with disciplinary action although whether to follow this option would be left to the implementing company to decide. A case study for the use of disciplinary action in conjunction with rules implementation has been presented within this document for consideration.

There were also a number of different approaches to the development of icons which has resulted in a potentially confusing diverse signage across the industry.

The OGP approach was to try to avoid using text where possible on the icons, to allow the icons to be understandable by workers from all geographic locations and irrespective of their level of literacy. In order to utilise existing familiarity, a decision was made to follow the principles of the ANSI and European Union standard format for safety icons:

- prohibition signs being recognised by a red circle with a cross bar running top left to bottom right with a black symbol on a white background
- mandatory signs (i.e. signs indicate that a specific course of action is required) being circular in shape with the background colour blue with the symbol in white.

The icons were then developed in accordance with the needs associated with the findings from the OGP data review.
Background

Keeping people safe is a top priority for Shell. The company aims to have zero fatalities and no incidents that harm people, or put neighbours and facilities at risk. This aim is defined as ‘Goal Zero’ and Shell works to build a culture where every employee and contractor believes this goal is possible.

After reviewing work-related fatalities that occurred between 2000 and 2008, Shell found that a failure to comply with a limited number of safety rules was a significant factor in the majority of cases. In response, Shell launched a programme to reinforce what employees and contractors must know and do to help prevent serious injury or fatality. Compliance is mandatory for all Shell employees and contractors while on business or Shell sites.

The 12 Shell Life-Saving Rules were launched in 2009 across the company. They were not new rules but were branded in such a way to increase awareness of the Rules’ ability to prevent serious injury and save lives. The Rules are also being better enforced to ensure consequences are applied if rules are broken. For example, if employees break the rules, they may face disciplinary action up to and including termination of employment, while contractors can be removed from site and barred from future work with Shell. The guiding principle is ‘if you choose to break the rules, you choose not to work for Shell’.

The programme was based on the successful introduction of active consequence management in the event of a safety rule violation in Shell’s manufacturing business.

The 12 Life-Saving Rules are:
1) Work with a valid work permit when required
2) Conduct gas tests when required
3) Verify isolation before work begins and use the specified life protecting equipment
4) Obtain authorisation before entering a confined space
5) Obtain authorisation before overriding or disabling safety critical equipment
6) Protect yourself against a fall when working at a height
7) Do not walk under a suspended load
8) Do not smoke outside designated smoking areas
9) No alcohol or drugs while working or driving
10) While driving, do not use your phone and do not exceed speed limits
11) Wear your seat belt
12) Follow prescribed journey management plan

Aims

Shell’s Life-Saving Rules aim to help employees and contractors comply with company-wide rules covering the activities of highest safety risk. The programme set out to meet the following objectives:

- achieve zero work-related fatalities and serious injuries caused by non-compliance with the life-saving rules
- improve compliance with safety standards/rules
- achieve a consistent Shell-wide approach to enforcing the rules, within the bounds of local legislation, from July 1, 2009
- contribute to a Goal Zero mindset – a safety culture where believing that no fatalities and no incidents that harm people is possible.

The core principles behind the programme were:

- The drive to save lives – preventing those non-compliances which result in the most serious incidents.
- The recognition that applying disciplinary actions has a major impact on human behaviour – it is necessary to show that Shell is serious by applying the maximum allowable disciplinary action once a life-saving rule is broken. This means applying the principle if you choose to break the rules, you choose not to work for Shell.

- Transparency, clarity and fairness – communicating the Rules effectively to all employees and contractors, making it clear each violation would be investigated thoroughly, consequences would be applied and that the consequences also apply to those who contributed to conditions for rule breaking.

Communications strategy

Successful implementation of the Life-Saving Rules required change and good project management. Communications and engagement on the Rules started in March 2009, with the Rules fully enforced from July 1, 2009.

The communications objectives stated for the programme include:

- understanding the Rules and their associated consequences, specifically: staff acknowledge they understand the rules in at least 75% of countries by May 30, 2009 and at 100% by July 1, 2009
- understanding of roles and accountabilities of implementation leads, leadership, employees and contractors
- staff believe that leaders are role modelling good Life-Saving Rules behaviours and decisions
- compliance with the Rules, as measured quarterly.
In the first half of 2009, the Life-Saving Rules were rolled out country by country based on project plans created by Country Coordination Teams. The roll out principle was: ‘Businesses drive, Countries coordinate’. Within this framework, communication in each of the businesses/functions was led by focal points, with co-ordination by region and country hubs. Country communications could tailor local planning by as required, to ensure consistent cross-business delivery within each jurisdiction.

The following principles were used to guide communications activities for the roll out:

- communications is owned and delivered by line management
- must use face-to-face communications to brief employees/contractors on the rules
- consistent set of briefing materials with some leeway to link to local context
- do not allow ‘cottage industry’ in production of collateral
- progress of roll-out has to be monitored/checked
- communicate outcomes following breaches (reinforces new approach) as well as celebrating positive safety behaviours/performance.

In the months leading up to the July 1 launch, Shell line managers engaged with those under their supervision to brief them on the Rules. Front line workers had the opportunity to discuss whether the Rules could be implemented in practice or whether there were any blockers. These blockers were later-on removed where applicable/possible. All employees and contractors had to confirm that they understood the Life-Saving Rules before they became effective on July 1, 2009.

Communication to contractor companies

Shell’s contracting companies engaged with their staff on the Rules and were requested to make sure that those working for Shell knew and understood them. Shell’s CEO also personally wrote to the top fifty contracting companies. All contractors were informed about the Life-Saving Rules and by contractual clauses the induction of new contractor workers about the Rules is sustained.

Continuous monitoring and improvements

Rule violations are tracked using existing management information systems and consequences are reviewed at the highest level to ensure that the Rules are applied effectively and that follow up action is taken. Campaigns are organised to focus on those rules which show most violations.

Consequence management

Consequence management and disciplinary action are driven by the legal position and agreements within each jurisdiction. Consider which other representative bodies, including staff councils and unions, should be informed.

Communications timeline

- February 3: CEO message sent to senior Shell leaders introducing the programme
- February 9: Executive Committee note with more detail sent to Country Chairs and all senior leaders
- February: briefing of key facilitators, including HSSE, HR, Communications
- March: briefing of line management/senior management of top fifty contractors
- March 30: Internal Life-Saving Rules website live, restricted access
- From March 30 to end June: briefing of all staff and contractors including relevant joint ventures
- July 1: Full implementation of Life-Saving Rules, company-wide
Communications materials

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| Leadership messages                      | • Email messages to Shell Country Chairs to introduce the programme and highlight need for “visible and felt” leadership from the top  
• Email messages from Executive Committee to members to Shell’s leadership team introducing the programme                                        |
| Life-Saving Rules internal website       | Developed to be the one-stop-shop for all Life-Saving Rules briefing, induction and creative materials. It also directs users to Q&As and how to submit ideas and success stories                                 |
| Induction and Briefing materials         |                                                                                                                                                                                                 |
| Leadership briefing pack                 | This slide pack is to brief senior management; provides key information and to stresses leadership role                                                                                              |
| Employee and Contractor induction pack   | Pack for leaders and supervisors to brief employees and contractors. Will allow minor tailoring by Business                                                                                          |
| Speaker support pack                     | Guidance, speaker notes and Q&As for leaders and supervisors to use for employee and contractor briefing                                                                                               |
| Guidance to clarify the rules            | Provides fuller details about application of rules, where they apply and exemptions. For use by line managers and staff (content is used in the work cards)                                               |
| Creative materials                       | Posters, banners, security badge/wallet cards, work cards, web banners, editable slides                                                                                                               |
| Contractor Leadership engagement materials| Slide pack with speaker notes and key messages document for use by contract holders for engagement with contractor leadership and management                                           |
| Questions & Answers                      | To underpin senior management briefing. Will be updated as required                                                                                                                               |
| Key messages and talking points          | A one page brief with core messages and talking points for the Life-Saving Rules programme. It can be used to brief leaders prior to staff engagements and to develop communications                             |
| External response briefing note          | For use by external-facing communications staff to respond to media queries                                                                                                                        |
Impact and benefits

Since their launch, the Life-Saving Rules have made an immediate impact on Shell, producing a paradigm shift in the way rule-breaking is viewed. Implementation has not been without its downsides. Opponents have argued that the consequences are too harsh, or that the rigid application damages trust and adversely impacts on existing intervention processes.

While consequence management has been applied, Shell continues to emphasise that the aim is not to dismiss people. Success is measured by how many lives have been saved, not by how many people have been asked to leave. Every violation prevented is potentially a life saved.

A recent survey shows that 97% of employees know about the Life-Saving Rules and what is required of them. Whilst there are still a number of violations reported each month, these reported violations are seen as successes as these interventions saved people’s lives.

There are signs that the programme is working. Shell’s injury rate in 2009 was down by 22% compared to 2008, the lowest ever. It has steadily come down over time, improving by more than 55% since 2000. Between 2008 and 2009, six fewer people died while working for Shell. The 2009 fatal accident rate was the lowest recorded, down 32% on 2008.

The campaign is being maintained with refresher communications focusing on the positive results of the implementation of the Life-Saving Rules. These have been communicated more than 500,000 employees and contractors, including monthly briefing for leaders, and quarterly campaigns focusing on a particular rule, e.g. speeding.

Summary

The implementation of the Life-Saving Rules is considered successful for the following reasons:

- a clear, consistent and simple message: life saving rules – the rules that save lives;
- effective internal and external stakeholder management;
- HSSE and HR working together;
- excellent communication materials available through a central website;
- a planned approach; and
- continued top and middle managements focus.
For further information and publications, please visit our website at

www.ogp.org.uk