



IADC
NORTH SEA
CHAPTER

**GUIDANCE ON THE MANAGEMENT
OF THIRD PARTY COMPETENCE FOR
SAFETY CRITICAL POSITIONS OFFSHORE**

Revision	Amendment	Date
1	Introduction: note added that elements of guidance may need to be modified for platform operations	24 March 2016

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Introduction

This Guidance has been developed by an International Association of Drilling Contractors (IADC) North Sea Chapter (NSC) Work Group.

The guidance document also incorporates amendments and feedback provided by other NSC members and has had input from the Health and Safety Executive (HSE).

It was developed to:

- ensure as far as is reasonably practicable that Third Party personnel involved in safety critical positions are competent to carry out the tasks and responsibilities required of them; and
- simplify and reduce the workload being placed on OIM's and other senior supervisors in the task of reviewing the competence of Third Party personnel; and
- provide a consistent approach to ensure all Third Party employers and suppliers are aware of the Drilling Contractor's requirements with respect to the competence of personnel they supply in support of the offshore drilling operation.

It should be noted that this guidance has been developed based on mobile rig operations and some elements may need to be modified for platform drilling due to differing contractual arrangements.

The IADC North Sea Chapter recommends this guidance is adopted by all members operating on the UKCS, suitably amended to reflect their own specific operations and management systems. Their use will deliver a consistent approach to third party competence assurance, reduce bureaucracy and associated burden on OIM's and give a more reliable delivery to enhance offshore safety. It is acknowledged that the principles set out in this guidance could be used in other geographical areas, subject to review against local regulatory requirements.

1.0 Background

1.1. Objective

In an effort to further reduce the risk of incidents offshore there is a strong emphasis in our industry on human factors and in particular competence management as this is recognised as a key component of the management of major accident hazards. This emphasis has greatly increased the pressure on offshore OIMs and senior supervisors to review and assess the competence of 'Third Parties'. It is in the interest of all parties to ensure that in addition to Drilling Contractor personnel all non-Drilling Contractor personnel on board members' rigs are also competent to carry out their assigned work tasks to ensure the safety of themselves and all others onboard. It is the responsibility of the employer of all Third Party personnel provided in support of offshore operations to ensure, as far as is reasonably practicable, the competence of such individuals to carry out the tasks and responsibilities required of them.

For the purpose of this guidance 'Third Parties' can be defined as any personnel who are not direct employees of the Drilling Contractor. Such personnel can be provided by the Drilling Contractor either as Agency Personnel to fill positions for which their own employees are not currently available, or as Contractors engaged by the Drilling Contractor to carry out maintenance, repair, or other specialised onboard functions. In addition they can be provided by Clients as their own employees, or in some instances, as self-employed contractors to cover the Client's onboard well and drilling management functions, or as contractor companies providing drilling support and other associated services to the Client.

Historically the assessment of Third Party personnel competence has been in the first instance carried out by an onboard interview by the OIM, or his designated responsible person, during the induction process utilising a checklist questionnaire. This is then augmented on an ongoing basis by observation and questioning by line supervisors as required whilst the Third Party is onboard. This has proved an administrative burden and time consuming process. It is also proving more difficult to correctly assess competence as many of the drilling and support functions carried out onboard are now more specialised and outwith the normal expertise of an OIM and senior or line supervisors.

It is recognised a more comprehensive process is required to reduce much of the administrative burden currently placed on the OIM and offshore supervisors with more emphasis placed on pre-screening and data gathering onshore by both the Drilling Contractor's shore based management and also Client management. Once personnel are already onboard there can be a strong temptation to accept 'what you have' even if some doubt remains.

This guidance has been developed to assist member companies in their 'Management of Third Party Competence for Safety Critical Roles' (as defined by the HSE's HID Offshore Inspection Guide - Wells Personnel Competency Management System Inspection Guide). In this guidance the list of Safety Critical Roles relates specifically to those involved in well integrity only and **companies using this guidance should augment this to include any other positions performing work on, or operating, safety critical systems as defined in the unit's Safety Case and associated Performance Standards.**

1.2 Regulatory Background

All parties (whether individuals, contractors, duty holders or employers) involved in offshore drilling operations have a duty of care to themselves, their personnel and others involved in the operation.

They must ensure that foreseeable risks are managed, such that they are as low as reasonably practicable (ALARP).

In the offshore drilling environment, where major accident hazards are a risk, duty holders must take appropriate steps to ensure that all personnel who perform safety critical tasks are capable, competent and resourced to carry out those tasks.

This duty can be discharged by ensuring that third party companies that provide personnel to perform safety critical tasks have suitable policies, procedures and management controls for all foreseeable operations. It is reasonably practicable to ensure that management systems address competence of all personnel assigned to perform safety critical tasks. It is not acceptable to make untested assumptions about the competence of individuals. Competence is defined as the ability to undertake responsibilities and perform activities to a recognised standard on a regular basis. It is a combination of skills, experience and knowledge.

The Health and Safety at Work Act 1974 places legal duties on individuals and employers to ensure the provision of such information, instruction, training and supervision as is necessary to ensure safety. The Safety Case Regulations require duty holders to ensure that they comply with all relevant statutory provisions and have satisfactory arrangements for the management of contractors and sub-contractors.

2.0 Procedure

2.1 Overview

The purpose of a Competence Management System (CMS) is to control in a logical and integrated manner a cycle of activities within the company or organisation that will assure and further develop competent performance at work. The aim is **to ensure that individuals are clear about the performance that is expected of them, that they have received appropriate training, development and assessment, and that they maintain their competence over time.**

It is the responsibility of every employer involved in offshore operations, whether directly linked by a contract with the Drilling Contractor (Duty Holder) and Client (Operator), or indirectly by their own contracts with either of the two main contract holders, to ensure their personnel are competent for the tasks expected of them. **This guidance only relates to the management of competence for Third Parties and is not a substitute for a CMS.**

To ensure consistency and industry acceptance it is recommended the procedure contained within this guidance document, or one based on similar principles, is in place on all UKCS Drilling Contractor rigs. This should cover all Third Party personnel as described within this guidance including: client personnel, client contractor personnel, self-employed consultancy personnel, agency personnel and Drilling Contractor contractor personnel.

For ease of use flow diagrams have been developed to assist members in their use of the procedures included in this guidance. These have been combined into four categories shown below:

- Drilling Contractor Agency Personnel (2.4.1)
- Drilling Contractor Service Providers (2.4.2)
- Client Personnel (Safety Critical) (2.4.3)
- Client Contractors (Safety Critical) (2.4.4)

If required these categories can be expanded to include personnel who do not readily sit within one of the above groups.

2.2 Application

The procedures contained in this guidance apply as a minimum to the following safety critical positions:

Location	Position	
Offshore	OIM	Well Service Personnel
	Company Man	Well Test Personnel
	Toolpusher	Coil Tubing Personnel
	Drilling Supervisor	E-line Personnel
	Driller	Slick Line Personnel
	Assistant Driller	Completions Personnel
	Derrickman	Subsea Engineers
	Mud Logger	BOP/LMRP Engineers
	Drilling Fluids Engineer	Well Integrity Engineers
	Cementer	Production Supervisors
	Additional positions as required	

Based on "OGUK Guidelines on competency for Wells Personnel Jan 2012" and "HID Offshore Inspection Guide – Wells Personnel Competency Apr 2014"

(Note: Members should append additional roles for personnel performing work on, or operating, safety critical systems as defined in the rig's Safety Case and associated Performance Standards)

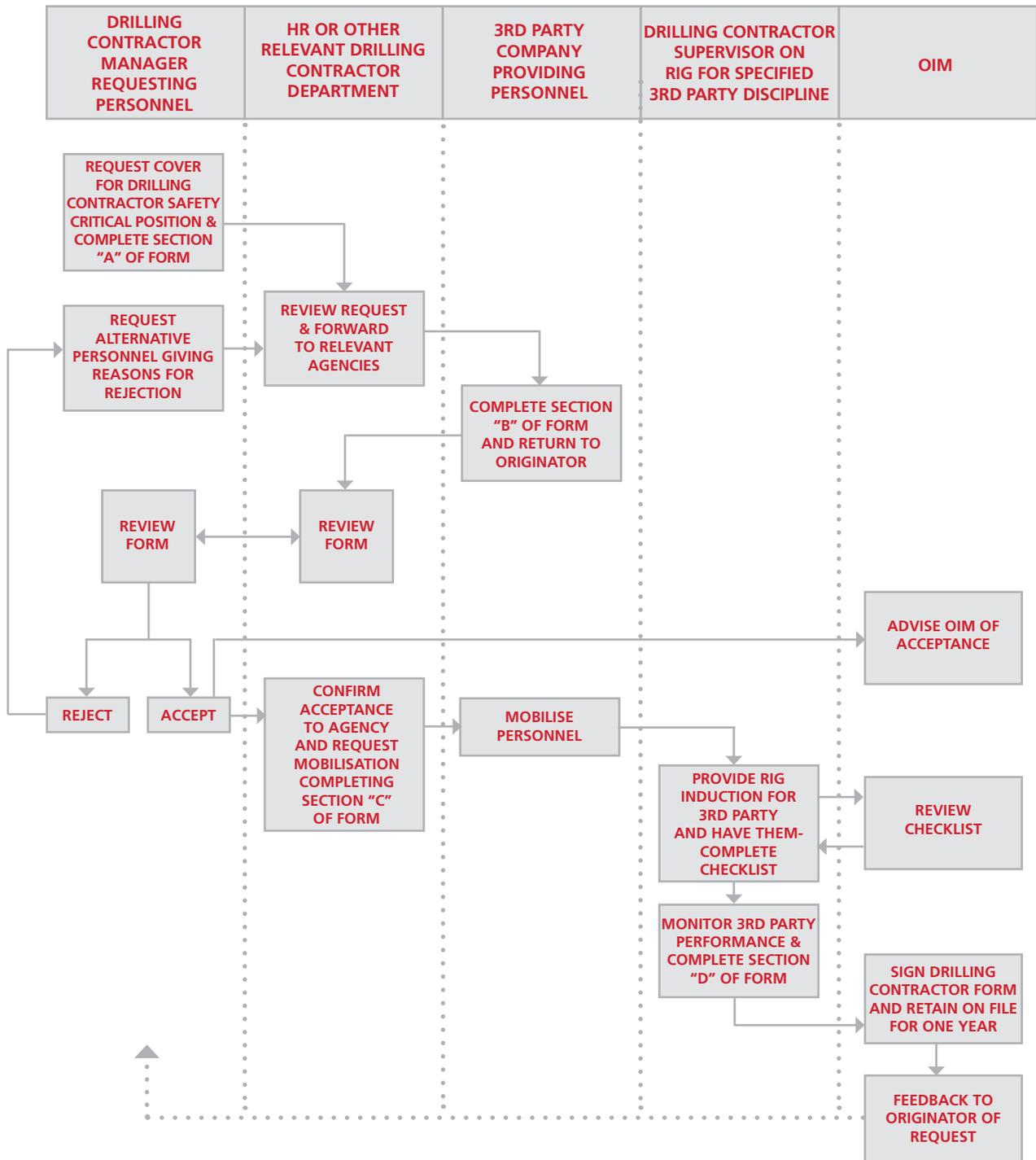
2.3 Responsibility

It is recognised job descriptions will vary between companies, however the following generic descriptions are used in this guidance and can be modified by those using it and the associated procedure to better suit the terminology used within their own organisation.

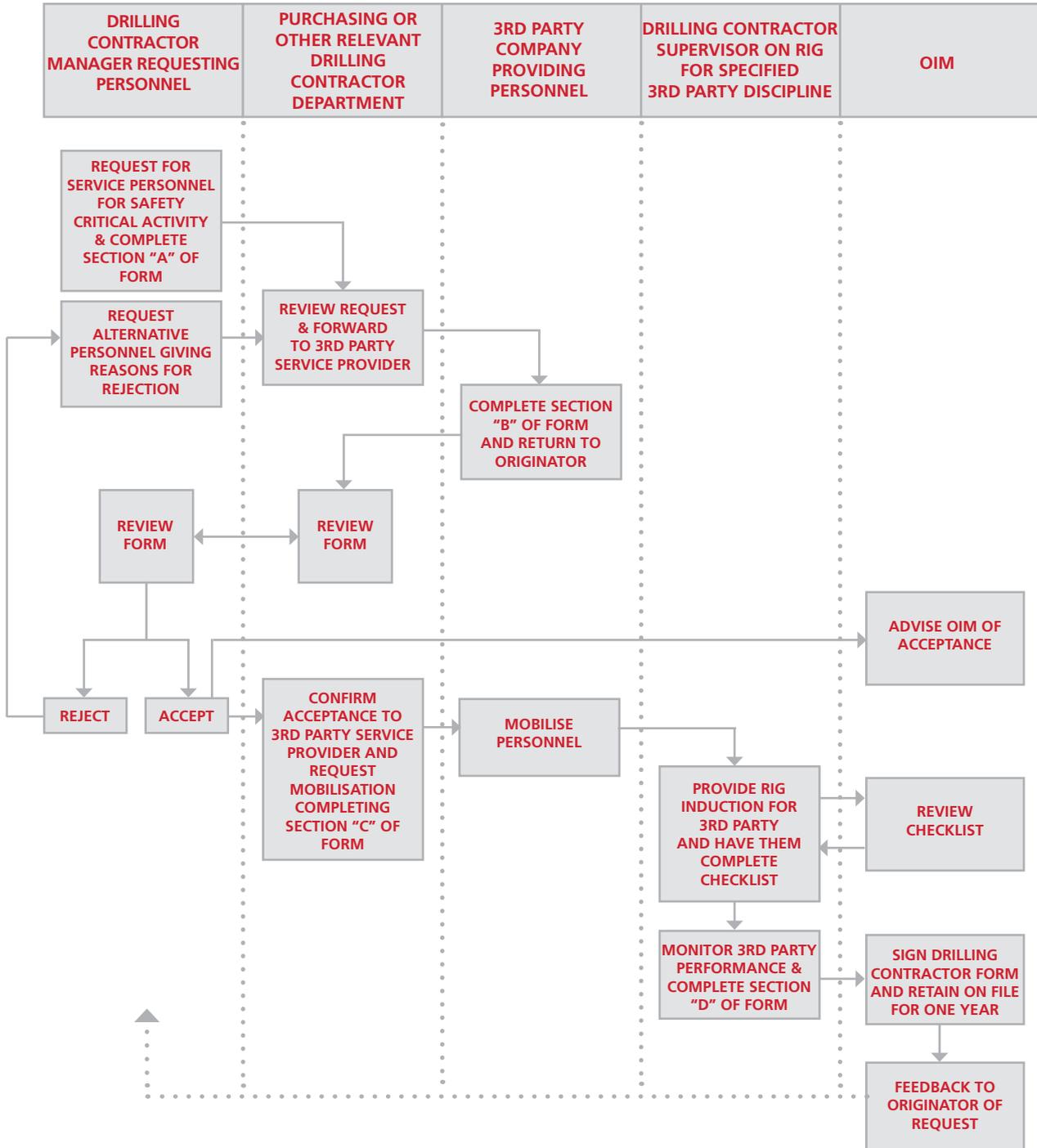
- Rig Manager / Operations Manager – responsible to ensure this procedure is followed within their rig team including onshore support members of management and offshore supervisors.
- OIM – responsible to ensure this procedure is followed onboard their rig.
- Hiring Manager / HR Manager / Personnel Manager (either Drilling Contractor or Client) - responsible for initiating this process when deciding on mobilising agency or contractor personnel to work onboard.
- Drilling Manager / Well Construction Manager / Drilling Superintendent (Client) - responsible for ensuring responsible management personnel within the client organisation complete the relevant sections of the Onshore Competence Review Form and participate as required in the Onboard Monitoring / end of Trip Assessment section.

2.4 Flowcharts

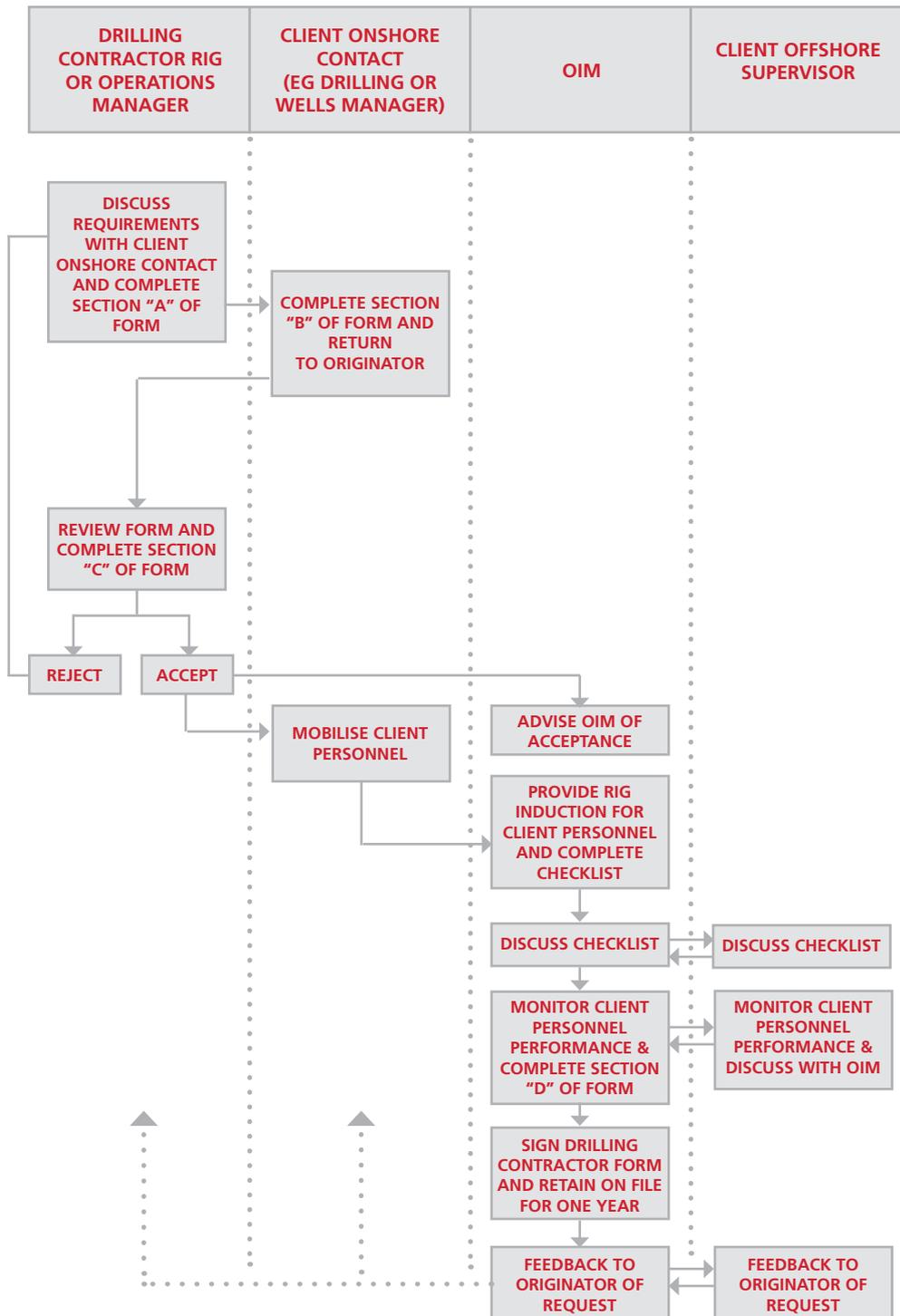
2.4.1 Competence Review of Drilling Contractor Agency Personnel



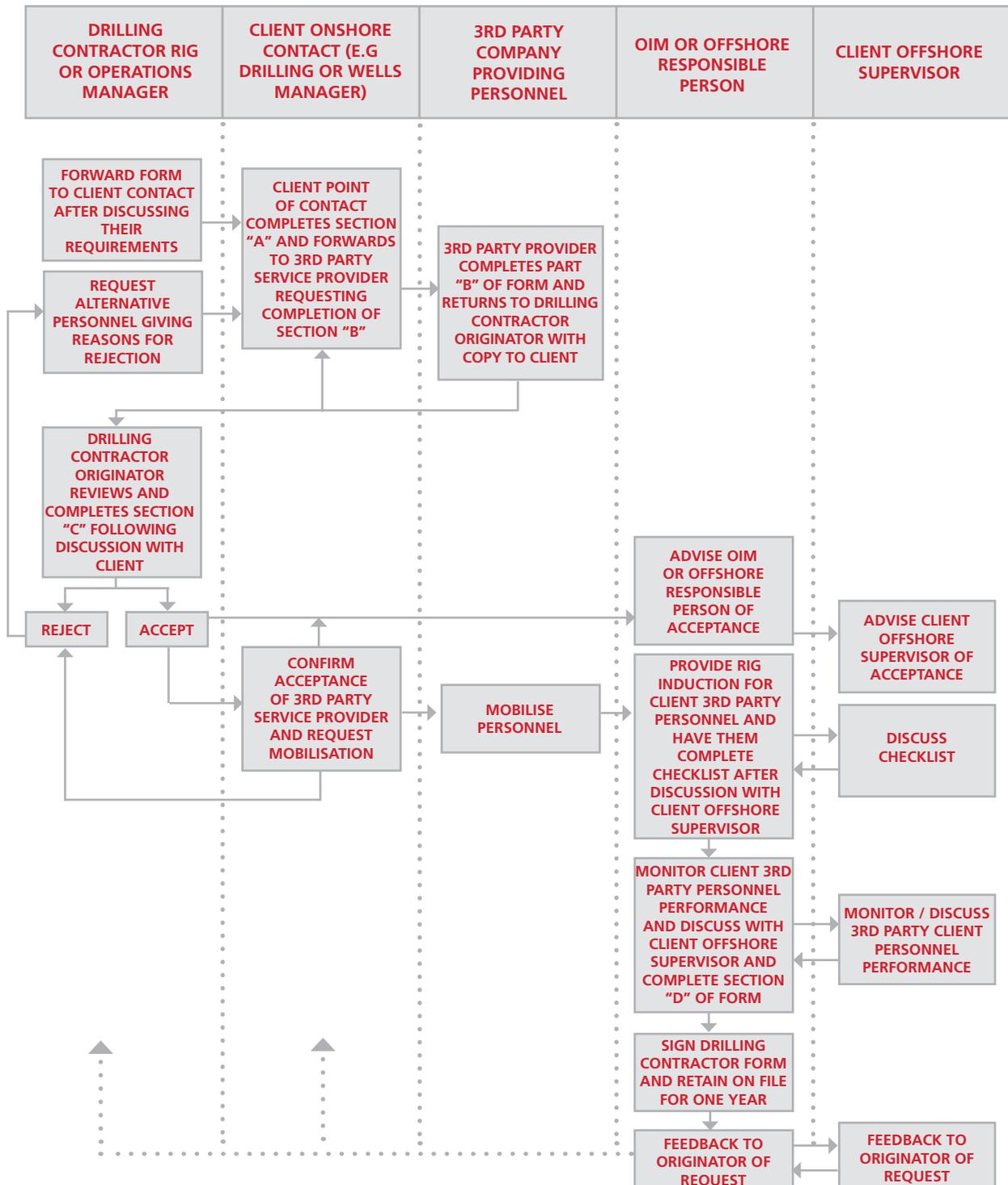
2.4.2 Competence Review of Drilling Contractor Service Providers



2.4.3 Competence Review of Client Personnel (Safety Critical)



2.4.4 Competence Review of Client Contractors (Safety Critical)



3.0 Onshore Contractor Competence Review

3.1 Guidance on completing the Onshore Competence Review Form

The 'Onshore Competence Review Form' shown in Section 3.2 is provided as a guide only and can be modified to suit individual Drilling Contractor requirements. It is split into four distinct sections as follows:

Section "A" – this section is completed by the individual or department within the Drilling Contractor's or Client's organisation that is responsible for requesting the Third Party individual(s) or service based on the individual Drilling Contractor's policies and procedures. The "Job Role" box should outline any specific skills or experience required. Example: "Driller required for semi sub, must have cyber chair and HPHT experience".

Section "B" – this section is a declaration by the company providing the individual(s) or service on their own assessment of the competence of the personnel they will be supplying to meet the Drilling Contractor's work scope or position requirements. In the case of a Drilling Contractor's Client completing the form, it relates to the individuals they are supplying to meet their own operational requirements or work scopes. This section is very important as the information within this section is that which the Drilling Contractor will be basing their assessment on the suitability or otherwise of Third Party personnel

Section "C" – this section is completed by the person within the Drilling Contractor's organisation who is responsible for accepting the personnel proposed to meet the position or service requirements. This position will vary from company to company, in some instances it may be an operational manager or alternatively procurement/purchasing or human resources. Company procedures should make it clear what is involved in the acceptance of personnel. (See Sections 3.3 and 3.4 of this guidance). Reasons should be given for accepting or rejecting personnel.

Section "D" – this section covers the ongoing monitoring of the individual Third Party personnel performance including technical, safety and human factors where relevant whilst carrying out their functions onboard. Depending on the classification of the Third Party this section should be completed by the OIM /Drilling Contractor Supervisor, or in the case of the Third Party being supplied to provide a role or service to the client company it should also be completed by the client's onboard supervisor or representative. It is recommended in any case the OIM /Drilling Contractor Supervisor and the client's supervisor/representative jointly assesses the performance of onboard Third Parties. Drilling Contractors should stipulate in their policies where and for how long the Section D should be retained on file.

Note. A pilot project based on the guidance contained within this document clearly identified the need for a separate and unique email address or web portal covering the flow of information required under this guidance. Whilst the requirements can be utilised under a pure "paper" only system it is recognised that this may prove cumbersome and more importantly time consuming.

3.2 Onshore Competence Review Form

A. Request for Personnel (to be completed by Drilling Contractor Manager responsible for initiating request or Client onshore manager as applicable)		
Company		
Job Role (include specific equipment and operational experience required)		
Anticipated Dates for Deployment		
B. Competence declaration (to be completed by company providing personnel)		
Please provide name or names of personnel mobilising		
Do you operate a competence management system (CMS) in compliance with recognised industry standards?	Specify:	
Have the personnel named above completed your company competence management scheme sufficiently to be deemed competent to fulfil the job requirements?	Specify:	
If you do not operate a recognised CMS please provide alternative evidence to demonstrate the competence of personnel.	Specify:	
I confirm that the named personnel are competent for deployment on this job role within the approved dates for deployment		
Name	Position	Date

Send completed form back to Drilling Contractor / Client (if Client Contractor)

C. Mobilisation Acceptance by Drilling Contractor (to be completed by person responsible for hiring)		
Based on the above declaration are the named personnel accepted for deployment to "-----".		
Accepted	Yes <input type="checkbox"/>	Give reason:
Name	No <input type="checkbox"/>	Give reason:
Signature	Position	Date

D. On Board Monitoring / end of trip Assessment (to be completed by OIM, together with Drilling Contractor Supervisor or Client Rep)			
Evaluation Criteria	Good/Exceeded Expectations	Met Expectations	Below Expectations
How did the above named perform their job role with regards to the required technical requirements?			
How did the above named perform their job role with regards to the required HSE requirements?			
Reviewed by Drilling Contractor Supervisor or Client Rep:	Name and Sign:		
Date:			
Accepted by OIM:	Name and Sign:		
Date:			

3.3 Drilling Contractor Acceptance Standard

It is recognised that the comments provided in Section B may make it difficult for the Drilling Contractor to fully assess the individual as this can be subjective. To assist in assessment it is suggested that a 'traffic light' system could be introduced into the Drilling Contractor's procedures as an 'Assessment Criteria' along the lines of the generic example shown on the following page. Individual Drilling Contractor companies can then stipulate what is acceptable i.e. all green – accepted, majority green with some amber – accepted but only able to work under supervision, any red – not accepted unless further investigation and communication carried out.

In addition the assessor or the individual reviewing the form should:

- during completion of the post induction checklist; or
- during the evaluation stage of Section D of the Contractor Competence Review Form

Consider:

- (1) Can the individual **recognise** what could go wrong with the operation or work scope they will be performing? and
- (2) Can the individual **respond** in an appropriate manner to the hazard if one should arise? ; and
- (3) Can the individual **evaluate** the ongoing situation? ; and finally
- (4) Can the individual **remediate** the situation to a stable and safe position?

3.4 Example of an Acceptance Standard

Any competence gaps should be judged on the basis of the responses to the 'Onshore Competence Review Form' questionnaire.		
Poor	Broadly Compliant	Fully Compliant
<p>Third Party is not covered by any industry recognised CMS.</p> <p>Third Party has not completed their company's CMS sufficiently to be deemed competent to fulfil the job requirements.</p> <p>Company does not operate a recognised CMS and has not provided sufficient evidence to demonstrate the competence of the Third Party.</p>	<p>Third Party is operating under their own company's CMS which is not industry recognised.</p> <p>Third Party has completed their company's CMS but is not yet judged fully competent to fulfil the job requirements without supervision.</p> <p>Company does not operate a recognised CMS however has provided some evidence to demonstrate the competence of the Third Party subject to working under supervision.</p>	<p>Third Party is covered under an industry recognised CMS.</p> <p>Third Party has completed their company's CMS and is deemed competent to fulfil the job requirements.</p> <p>Company does not operate a recognised CMS however has provided sufficient evidence to demonstrate the competence of the Third Party.</p>
IADC NSC MEMBER EXPECTATIONS		
Fully excluded from the rig or, as a minimum, prohibited from Safety Critical work	Only works under full supervision, and performance must be constantly assessed	Performance assessed and monitored, as normal, during rig operations

4.0 Offshore Competence Review

4.1 Guidance on completing the Offshore Competence Checklist

Sections 2 & 3 of this guidance set out the requirements and checks to ensure as far as reasonably practical that Third Party personnel due to undertake Safety Critical roles offshore are competent.

The purpose of the Offshore Competence Checklist is to provide a means for the OIM/Drilling Contractor Supervisor to establish if there is a potential issue with the competence of a Third Party involved in safety critical activities and verify the details set out in the Onshore Competence Review Form are correct. This form should be used in conjunction with the Acceptance Criteria set out in 3.4.

This process is not designed to prevent any Third Party from carrying out their duties. It is, however, designed to allow the Duty Holder to conduct their business in a safe, efficient and incident free manner.

At the end of the offshore induction and completion of the checklist the new personnel should be assigned to an area authority, or similar who can assess what further induction is required to allow them to perform their role.

4.2 Offshore Competence Checklist

All supervisors, crews and third parties, working on this drilling rig should be fully familiar with:

The procedures, methods and work instructions, for operating within your employer's CMS; how each competence standard for your position is met and assessed; the extent of your subsequent training, development & assessment requirements and your management, supervision and operating responsibilities.

To assure us that you are fully familiar with these objectives, you are asked to complete the simple self-assessment shown below.

ONBOARD INDUCTION COMPETENCE CHECKLIST FORM

EMPLOYEE NAME:		DATE:		
COMPANY:		STAFF or AGENCY:		
POSITION:		TIME IN POSITION:		
WELL OPERATOR:		WELL NUMBER:		
Questions on competence assurance	YES	PARTLY	NO	Duty Holder Actions
1. Are you aware of the specific competence requirements for the role and the specific operational details and are you comfortable with performing the role?				
2. Do you need further information or support to perform the role?				
3. Is your performance being regularly assessed against your company's competence system?				
4. Is your competence assessment up to date (particularly relative to changes in offshore standards, equipment, and/or legislation)?				
5. Are your CMS records being maintained, and could they be made available to us?				

Name:	Signature:
Company:	Staff or Agency: