

# Issue HSSE - 1 March 2010

Guidelines for Health, Safety, Security and Environmental Management for

Jointly Operated Aviation Fuel Facilities at Airports



# Health, Safety, Security and Environmental Management System Guidelines

## Introduction

This document is intended as a framework to enable an Organisation to develop its own Health, Safety, Security and Environmental Management System (HSSEMS). It is not intended to constitute a management system itself.

A HSSEMS describes the framework with which the Organisation's HSSE systems are managed and to which all processes, standards and procedures are developed and maintained. The system in itself will not prevent accidents or incidents but should be used to aid the promotion of a culture where consideration of health, safety, security and the environment is primary.

The JIG HSSEMS Guidelines are intended to aid the translation of an Organisation's vision, policy and goals into the successful achievement of desirable performance in health, safety, security and environmental management.

# **Purpose**

The primary purpose of these guidelines is to enable a Joint Venture Manager to establish or enhance a HSSEMS based on industry best practices.

It should be noted that the Elements in these guidelines are not stand-alone but are all integral to the success of any HSSEMS. Each Element should be considered in conjunction with all other Elements when producing the documentation required to provide guidance and an auditable trail for compliance with the Management System.

A good HSSE procedure shall be clearly identified with the expectations of the Management System. Where there is a lack of identification between a specific procedure and the HSSEMS, then either the procedure will not deliver the objectives of the HSSEMS, the procedure is not required, or the HSSEMS is deficient.

Recognising the diversity of operations, cultures, and local environments, Organisations are expected to define processes and procedures to meet the Minimum Expectations of the HSSEMS and regulatory requirements. Whenever possible, programs implemented to meet the requirements of this HSSEMS should be consistent with industry best practice as defined by internationally accepted standards and specifications.

Joint Ventures will be audited against the Minimum Expectations of the JIG HSSEMS Guidelines.

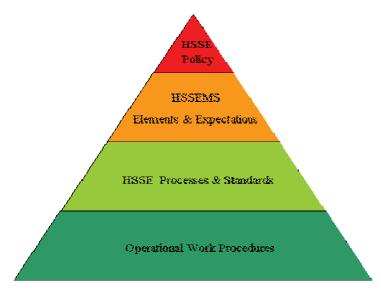
# **HSSEMS Documentation Hierarchy**

A HSSEMS is defined and supported by documents in a hierarchical structure. Documents and processes described at the top of the hierarchy (HSSE Policy, HSSEMS Elements & Expectations) are supported by Processes & Standards and Local



Operational Work Procedures). In all cases, documents and processes shall meet and support the requirements of those at higher levels in the hierarchy.

Figure 1: HSSEMS Documentation Hierarchy



## **Definitions**

Organisation – The legal entity, consortium or company that manages one or more jointly operated sites.

Minimum Expectation - The aspirations and overall purpose of that Element which form the basis of a good HSSEMS. As such, the Minimum Expectations constitute the auditable requirements of the HSSEMS, and facilities should establish and maintain programs focused on meeting the Minimum Expectations.

Additional Recommendations – These act as an enhancement to the Organisation's management system and should be considered when the Minimum Expectations have been met. They do not constitute the auditable requirements of the HSSEMS but will assist the Organisation in achieving continual improvement.



# Health, Safety, Security and Environmental Management System <u>Guidelines Elements</u>

- 1. Leadership, involvement and responsibility
- 2. Risk assessment and control
- 3. Asset design and construction
- 4. Documentation and records
- 5. Personnel and training
- 6. Occupational health and hygiene
- 7. Operation and maintenance
- 8. Management of change
- 9. Contractors and suppliers
- 10. Incident investigation and analysis
- 11. Emergency preparedness
- 12. Community
- 13. Management System Review and Improvement

**Appendix One – Example HSSE Policy Statement** 

Appendix Two – HSSEMS Gap Analysis Tool



# Element 1: Leadership, involvement and responsibility

## **Minimum Expectations**

- 1.1. Management shall be visibly committed to HSSE stewardship and make real personal commitment to HSSE.
- 1.2. Management shall ensure HSSE policies (including, as a minimum, HSSE, Drugs & Alcohol, Mobile Phone & PPE) are in place, visibly displayed and understood by all.
- 1.3. Authority, accountability and responsibility for all personnel shall be clearly defined by job position throughout the Organisation.
- 1.4. All employees and contractors shall have the opportunity and be encouraged to be actively engaged to provide input to HSSE systems and outcomes. This shall include attendance at HSSE and 'toolbox' meetings.
- 1.5. Performance goals and objectives shall be developed and documented that are based on risk and allow performance to be analysed for informed decision-making and drive continual improvement.
- 1.6. Management shall apply recognition and disciplinary programmes to reinforce and recognise desired behaviours consistent with HSSE policies and procedures.
- 1.7. All applicable safety, security, health, and environmental legislative requirements shall be identified, assessed and the necessary actions taken to ensure compliance.
- 1.8. Within their area of responsibility, Managers shall provide sufficient human, material, and financial resources for the effective development, operation, review, implementation, and maintenance of HSSE systems.
- 1.9. 'Safety walks' shall be conducted by Managers and Supervisors to a defined frequency. Safety walks should include site observations and interviews with employees or other information gathering techniques to identify unsafe behaviours and working conditions.

- 1.10. HSSE accountability shall be reviewed each time a position or incumbent changes.
- 1.11. Management shall establish and chair HSSE committees and subcommittees, as needed, to address site-specific HSSE issues and provide a mechanism for employee involvement. Meetings shall be held with interested parties (e.g. Airport Authorities).



### Element 2: Risk Assessment and Control

#### **Minimum Expectations**

- 2.1 A systematic approach to hazard identification and evaluation shall be used in each part of the Organisation. The approach shall identify all hazards which have the potential to cause harm or damage to people, property or the environment and for which mitigating activities shall be developed and implemented to reduce the risk exposure.
- 2.2 A systematic and structured approach for the identification and management of risks resulting from identified hazards shall be implemented. Risk assessments shall be conducted by competent persons using appropriate methods/tools and shall be reviewed at a defined frequency.
- 2.3 Security management plans shall be established, implemented, operated, monitored, reviewed and improved within the context of local security risks and regulatory requirements.
- 2.4 Results of hazard identification, evaluation and control and structured risk assessments shall be considered in the preparation and review of HSSE working practices, especially work instructions, emergency response plans and procedures produced by the facility and/or relevant contractors.

- 2.5 A system for the prioritisation of actions and control measures for the effective management of risk is applied.
- 2.6 Appropriate levels of residual risk transfer (e.g. insurance) are obtained and monitored regularly for adequacy of coverage.
- 2.7 Periodic assessments of hazardous materials inventories are conducted and material substitution to less hazardous alternatives identified, when practical to do so.
- 2.8 Hazard awareness programs are implemented within the Organisation that meet local and national requirements.
- 2.9 An agreement with a participant company or service provider is in effect to assist with the risk assessment process and to make methods/tools available.
- 2.10 Learning's from incidents and near misses are considered and provide input to the risk assessment process and Management System review.



# Element 3: Asset Design and Construction

## **Minimum Expectation**

- 3.1 Project management procedures are in place, and include definition of required reviews, approvals and associated documentation.
- 3.2 Criteria are established and procedures are in place for conducting and documenting safety, security, health and environmental risk assessments at specific project stages to ensure that operations integrity objectives are met.
- 3.3 In the design and construction of new or modified facilities, industry accepted design practices and standards are used which:
  - Ensure construction is in accordance with specifications.
  - Meet or exceed applicable regulatory requirements.
  - Embody responsible requirements where regulations do not exist.
- 3.4 Deviation from these design practices and standards, or from the approved design, is permitted only after review and approval by the designated authority, and the rationale for the decision has been documented.
- 3.5 A pre-startup review is performed and documented to confirm that:
  - construction is in accordance with specifications and correct commissioning takes place (e.g. soak testing and hydrant flushing)
  - safety, health, security and environmental protection measures are in place
  - emergency, operations and maintenance procedures are in place and adequate
  - risk management recommendations have been addressed and required actions taken
  - training of personnel has been accomplished
  - regulatory and permit requirements are met
- 3.6 A formal review and documented handover from the Project Team to the Operator is in place.
- 3.7 For complex projects or projects utilising new technologies, Organisations seek appropriate expert advice to ensure project risks, including safety, security, health, and environmental risks, are identified and managed.
- 3.8 Shutdown, abandonment or disposal of a particular facility (including mobile equipment) is controlled under project management procedures. The following minimum criteria are met:
  - Responsibility is assigned for ensuring proper procedures are in place
  - Applicable regulations are identified and referenced
  - The plan of work is formally approved
  - Potential hazards are identified and risk assessed

- 3.9 Technical standards of design are consistent with international best practice.
- 3.10 A post-implementation review is conducted after the construction of new facilities to determine if they meet expected functionality and HSSE requirements.



## **Element 4: Documentation and Records**

#### **Minimum Expectation**

- 4.1 HSSE management systems shall be documented to demonstrate conformance with applicable requirements. These documents shall be made available to employees who require access, in hard copy or electronic format.
- 4.2 Documentation related to HSSE management shall be controlled where adverse effects to HSSE performance could result from not using the correct version of a document.
- 4.3 Document control processes shall be implemented to ensure that current versions of documents are available to those who need them, that documents are periodically revised, as necessary, and approved by responsible personnel, and that documents are removed from use when obsolete, with superseded versions archived, as required for legal purposes.
- 4.4 A system shall be implemented to manage drawings, design data and other documentation, securely, including the definition of responsibilities for maintaining this information. Drawings and documentation shall be updated as required.
- 4.5 Applicable legislative requirements, guidelines, regulations, permits, codes, standards and practices shall be identified and monitored on an ongoing basis. The resultant operating requirements shall be documented and communicated to employees.
- 4.6 HSSE records shall be maintained, available and retained as necessary. Obsolete records shall be identified and removed or archived.
- 4.7 Employee health, medical and occupational exposure records shall be maintained with appropriate confidentiality and retained as necessary.

#### **Additional Recommendations**

Nil



# Element 5: Personnel and Training

#### **Minimum Expectation**

- 5.1 The safe working skills and competencies required for each job function (including Trainers) shall be identified, documented and periodically reviewed. Particular attention shall be given to functions with the potential to directly affect HSSE performance.
- 5.2 Procedures shall be established and maintained to identify and provide HSSE training required by local legislation.
- 5.3 HSSE inductions shall be conducted at commencement of employment, for job transfers, for new contractors and others performing work for or on behalf of the Organisation. All visitors shall receive a HSSE induction appropriate to the nature of their visit including the hazards to which they may be exposed and evacuation and emergency procedures.
- 5.4 Systems shall be established and maintained to identify specific HSSE training needs (including emergency response procedures) of personnel based on their job function and expected progression. Training needs shall be prioritised and training provided.
- 5.5 An employee training record shall be maintained for every employee, which indicates:
  - 1) for which tasks training has been given and the date of such training
  - 2) the signature of the trainer
  - 3) a "yes/no" assessment of whether the trainee demonstrated satisfactory understanding of the training
  - 4) the signature of the trainee
- 5.6 Follow-up on-the-job observation (with refresher training if it is found to be necessary) shall be undertaken by supervisory or training staff at a frequency determined by the Manager, based on his assessment of on-going employee performance. The dates and results of these follow-up observations shall be recorded on the employees training record.

- 5.7 Recruitment and selection criteria for job functions include consideration of personal competencies and capabilities required to carry out the role safely.
- 5.8 Periodic HSSE competency testing is performed for job functions with potential to affect HSSE performance.
- 5.9 Where driving a vehicle is one of the job function competencies, drivers possess valid Government-issued drivers' licences and have completed a practical safe-driving course.



# Element 6: Occupational Health & Hygiene

## **Minimum Expectation**

- 6.1 A system is implemented, documented and maintained to identify, evaluate, control and monitor all occupational health hazards associated with all activities. The system ensures that hazard exposure levels are within accepted local regulatory standards. The system considers long term health effects. The system is updated regularly and whenever there are significant changes.
- 6.2 Health risks are effectively managed in the workplace, appropriate first aid arrangements/access to medical services is provided, and appropriate Personal Protective Equipment is available, dependent on the location and nature of operations.
- 6.3 Personnel undergo medical assessments prior to the commencement of employment to ensure their fitness for the activities required of them, as local legislation permits. All medical records are kept confidential.
- 6.4 To reduce health hazards in handling aviation products and other materials which may be held at the facility, safe handling precautions (extracted from the current Material Safety Data Sheets) are prominently displayed. All Material Safety Data Sheets are reviewed regularly to ensure the latest versions are available.
- 6.5 Where appropriate, preventative and corrective measures, including the control of alcohol and drug use and abuse, are taken to ensure personnel are fit for work.
- 6.6 All health incidents and accidents are recorded in a format that can be reported to the participants of the Joint Venture.

- 6.7 Preventative and corrective measures are taken to manage the risk of transmission of communicable diseases.
- 6.8 Effective initiatives, such as health promotion programs and employee assistance programs, are in place to promote the health and wellbeing of personnel.
- 6.9 Effective systems are in place to ensure the rehabilitation and return to work of personnel following a work-related injury, illness or other adverse health effects. Systems are maintained for addressing legal claims in occupational health cases.
- 6.10 A health surveillance program is in place, based on needs as identified by a medical representative. This program has qualified occupational health & hygiene specialist input with clearly defined procedures to manage the results of health surveillance. This includes potential job reassignment or rotation or other non-discriminatory responses.
- 6.11 Management have the responsibility to ensure that all contractors engaged in activities on behalf of the Organisation have made adequate occupational health provision.
- 6.12 Hazard exposure levels comply with international good practice requirements.



# Element 7: Operation & Maintenance

## **Minimum Expectation**

- 7.1 Organisations shall establish and maintain a Permit to Work system or equivalent program to ensure work activities are coordinated and controlled, and that safety, security, health, and environmental hazards of work activities are identified and assessed.
- 7.2 Procedures shall be established and maintained which ensure the health and safety of all visitors to the site. Compliance with the HSSE requirements specific to the site is mandatory for visiting and remaining on the property.
- 7.3 Documented Operating Procedures shall be established in line with the JIG Guidelines for Quality Control & Operating Procedures, the JIG HSSEMS Guidelines and applicable legislation. Procedures shall meet the most stringent requirements of JIG Guidelines (QC & Operations and HSSEMS) and applicable legislation (national and regional).
- 7.4 Systems shall be established and maintained to ensure the on-going integrity of plant and equipment. This includes maintenance, inspection, testing and calibration of equipment and, safety, security and environmental systems appropriate for the level of associated HSSE criticality.

- 7.5 Documented preventative maintenance procedures are established to ensure the requirements of 7.2 are met.
- 7.6 Systems are established and maintained to control the quality and availability of maintenance consumables and replacement parts.
- 7.7 Systems are in place to ensure a full understanding of HSSE risks and opportunities (including soil & groundwater contamination) prior to every transaction, including leases and property transfers.
- 7.8 Operating procedures contain an effective system for shift handover



# Element 8: Management of Change

## **Minimum Expectation**

8.1 Procedures shall be created and implemented to identify changes with potential HSSE implications. Potential hazards to personnel, plant, equipment, and the environment shall be assessed and the appropriate action to manage those hazards shall be documented.

Changes to the following are evaluated for potential HSSE impacts:

- Plant and Facilities
- Equipment
- Hardware or Software
- Processes
- Operating Procedures
- Design and Construction
- Maintenance Procedures
- Composition or Properties of Materials
- Organisation Structures and Responsibilities
- Personnel Training or Competency Requirements
- Regulatory Requirements
- 8.2 Changes shall be assessed and approved by the responsible technical authority (Change Owner) and communicated to those who may be affected.
- 8.3 Each time a Management of Change process is conducted a record shall be kept.
- 8.4 A system shall be maintained to track changes in legal and regulatory requirements. When required, regulatory approval is sought and obtained prior to implementing a proposed change. The appropriate regulatory authority is informed as required.

#### **Additional Recommendations**

8.5 An agreement with a participant company or service provider is in effect to assist with the Management of Change process and to make methods/tools available.



# Element 9: Contractors and Suppliers

## **Minimum Expectation**

- 9.1 A HSSE risk-based pre-qualification evaluation and selection procedure shall be utilised to confirm contractors and suppliers have the necessary HSSE competency and capability to successfully undertake work in a manner consistent with HSSE requirements. Prior HSSE performance shall be a criterion for contractor prequalification and selection.
- 9.2 All contractual agreements relating to physical services conducted on site shall include documented HSSE requirements as well as defined roles, responsibilities and accountability for HSSE management. This includes reporting and investigation of incidents. Contractors shall report HSSE performance measures to the Contract Owner.
- 9.3 For physical services conducted on site, a system shall be implemented to assess contractor compliance and performance by auditing commensurate with HSSE risk throughout the lifecycle of the contract activities. All identified deficiencies shall be documented and corrective action(s) applied, including summary dismissal and summary contract termination.
- 9.4 The HSSE requirements of equipment and materials, which have the potential to affect the health, safety, or security of people and protection of the environment, are specified prior to purchase, hire or lease as part of the tender process. Compliance with these specifications is verified by the Contract Owner or designate.
- 9.5 Procedures shall be established and maintained which ensure the health and safety of all contractors working at the site. All contractors shall receive a HSSE induction appropriate to the nature of their work and the hazards to which they may be exposed. Compliance with the HSSE requirements specific to the site is mandatory for working on site.

- 9.6 A list of qualified contractors and suppliers is maintained in support of 9.1.
- 9.7 A post-completion assessment of contractor performance is completed at the end of the contract period to assist in continual monitoring of contractor performance and to update the list of qualified contractors and the comparison of contractor performance.



# Element 10: Incident Investigation and Analysis

## **Minimum Expectation**

- 10.1 Procedures shall be established and maintained for the identification, reporting and investigation of workplace hazards, incidents and near misses or any situation detrimental to HSSE.
- 10.2 A documented incident investigation process shall be established to identify contributing factors and root causes of incidents or near misses. The investigation team members shall be commensurate to the actual or potential severity or consequences of the incident or near miss.
- 10.3 Prioritised actions aimed at preventing the recurrence of similar events shall be implemented. A system shall be implemented to track the effectiveness and completion of preventative actions including responsible individual(s) and timelines for completion.
- 10.4 A system shall be implemented and maintained in the Organisation to ensure compliance with local, state/provincial, and national legislative requirements related to incident reporting and record keeping.
- 10.5 Incident reporting procedures shall include clear internal reporting lines, including incident notification escalation to management and participants, as needed, based on incident severity.
- 10.6 A system shall be established and maintained to communicate lessons learned from incident investigations within the Organisation and the participant companies.

#### **Additional Recommendations**

Nil



# Element 11: Emergency Preparedness

## **Minimum Expectation**

11.1 The nature and scale of reasonably foreseeable emergencies shall be identified and documented. Formal response plans shall be established to address these potential emergency situations. All such plans and resources shall be in place for new operations prior to start-up.

Emergencies to be considered are:

- Equipment breakdown affecting ability to operate
- Power failure
- Product spillage
- Serious injury to staff, contractors or third parties as a result of actions of joint operation
- Significant facility asset damage
- Terrorist actions, bomb warning, civil disturbance etc.
- Fuel quality problems
- The occurrence of an aircraft accident/incident where fuel could be a contributory factor
- Fire
- 11.2 Systems for emergency preparedness and response plans shall be developed with due regard to the nature of the potential emergency based on appropriate hazard identification and risk assessment.
- 11.3 Procedures and arrangements for the management of major emergencies shall be implemented and effectively linked to the management systems of emergency services and other third party interfaces (e.g. logistics providers, airport authorities and into-plane fuelling companies).
- 11.4 Emergency preparedness, response plans and resources shall be periodically tested through drills and audits to verify their appropriateness and effectiveness and the competencies of personnel to carry them out. Learnings from emergency drills shall be captured and actions taken to incorporate these in the next revision of the plans.
- 11.5 The contact details for emergency management personnel and the contents of the emergency response plans shall be communicated to all relevant personnel within the Organisation and other interested parties and updated at appropriate frequencies.

- 11.6 Systems are in place to receive notification of changes to security threat levels (from national, local government, airport authorities, oil companies etc.) and procedures are established to ensure actions are taken to reassess the risks.
- 11.7 Procedures are in place to handle media interest.



# **Element 12: Community**

## **Minimum Expectation**

- 12.1 Management shall evaluate whether community awareness efforts are necessary. This evaluation shall take into account the following factors:
  - Existence and effectiveness of airport authority community programmes
  - Size and proximity of local community
  - Sensitivity of local environment
  - Known concerns of the local community
- 12.2 Periodically, Management shall assess the effectiveness of any community awareness communication processes related to HSSE information.
- 12.3 Systems shall be established to communicate information on HSSE aspects of operations to employees and other stakeholders.
- 12.4 Open communication shall be maintained with local governments, authorities, and agencies, as appropriate (e.g. airport safety committees and meetings with airlines and handling agent representatives).
- 12.5 Management shall inform and respond to questions and concerns from the onairport community regarding HSSE issues, Organisation operations and emergency response processes.

#### **Additional Recommendations**

Nil



# Element 13: Management System Review and Improvement

### **Minimum Expectation**

- 13.1 Organisations shall make sufficient time and resources available to support externally-led HSSEMS auditing programs.
- 13.2 External audits shall be conducted at least once every three years. Results of audits and corrective/preventive actions in response to audit findings shall be documented.
- 13.3 Audit findings shall be addressed through documented action plans and focus on corrective and preventive measures. Progress on implementation of action plan items shall be tracked and reported by Management.
- 13.4 Documented audit protocols shall be used and auditors shall be competent on the basis of both training and experience. Findings from audits shall be communicated to The Board or equivalent overseeing persons to ensure continual improvement.
- 13.5 A process of internal HSSEMS audits shall be established that is commensurate to the risks associated with the Organisation. Internal auditors shall be competent on the basis of both training and experience.
- 13.6 A Management review should be conducted at least annually which covers at least the following: output from internal and external audits, findings and trends from incident investigations, near misses and safety conversations and changes to the risk profile of the Organisation.

- 13.7 Subsequent audits are not conducted by the same auditor.
- 13.8 A follow-up to the external audit is arranged within the three-year period to ensure corrective actions are in place and to assist with continued improvements.



## Appendix One – Example HSSE Policy Statement

#### Organisation Name Health, Safety, Security and Environment (HSSE) Policy

Organisation Name is wholly committed to establishing a working environment where the Health, Safety and Security of our employees and stakeholders is our highest priority. In operating our business we will seek to minimise the overall environmental impact of our activities. This will be achieved by implementing an effective HSSE Management system which complies with regulations as required by legislation, industry codes of practice and any associated guidelines.

All employees of the Organisation are required to project a positive attitude and commitment to the promotion of a culture which will ensure that the policy is effective, thus ensuring a safe working environment for themselves and others.

This will be achieved by:

- Setting standards that will not only meet local, industry and international statutory regulations relating to health, safety, security and environmental issues and business activities but also seek to encompass the ongoing evolution of industry best practice.
- Ensuring that all staff employed directly or indirectly (including contractors) by the
  Organisation comply with all procedures and are aware of their responsibilities with
  regard to the personal health, safety and security of themselves and those who work
  with them, along with the need to protect the environment.
- Providing adequate training to ensure that all employees can conduct their duties safely and efficiently and maintain a safe place of work and, for contractors, ensuring that such training has been provided.
- Providing and maintaining safe plant, machinery, equipment & design standards.
- Ensuring that any potential hazard to health, safety, security or the environment associated with the activities of the Organisation is assessed and appropriate action undertaken to prevent risk to the Organisation, its personnel and the broader community alike.
- Ensuring that all necessary documentation is available to monitor the performance of the Organisation and to report information on health, safety, security and environmental matters as appropriate to management, national & local authorities, employees, contractors, customers and the public, and to recommend protective measures.
- Reviewing on a regular basis, and updating where necessary, operating standards, procedures and practices in accordance with changes in Organisation policy, changes in technology and statutory local, industry and international regulations.
- Monitoring for compliance through inspection, trend analysis and training to ensure continuous improvement.

The Board (or equivalent overseeing persons) will be accountable for all aspects of HSSE within the Organisation. The General Manager is responsible for the implementation and stewardship of this policy. Each employee has a responsibility to promote the objectives in accordance with the policy set down.

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# Appendix Two - HSSEMS Gap Analysis Tool

The following steps are suggested to ensure an effective gap analysis is conducted and an authorised action plan is used to close any gaps:

- Identify the gap between the way your organisation manages HSSE issues and the expectations detailed within the JIG HSSEMS Guidelines.
- Identify tasks and determine resource requirements and the responsible persons to close any identified gaps.
- Monitor closure plans routinely, addressing remaining tasks on a priority basis.
- Ensure the appropriate decision makers in your organisation receive the gap analysis results and approve the action plan.

The JIG HSSEMS Guidelines Gap Analysis Tool can be used to manage these steps.

## **HSSEMS Guidelines Gap Analysis Tool**

The following table shows you how the Gap Analysis Tool can be used to identify gaps, record and assign actions and manage the process through to completion.

Table 1 – Example of completed Gap Analysis Tool

Ref	Element Requirement		Gap		Risk		Proposed	Responsible	Planned	Planned	Status	Comments
		Yes	No	High	Med	Low	Action To Close Gap	Person	Start Date	Finish Date	% Complete or Closed	
Element 1: Leadership, involvement and responsibility												
	Minimum Expectations											
1.1.	Management shall be visibly committed to HSSE stewardship and make real personal commitment to HSSE.		X									
1.2.	HSSE policies (including as a minimum HSSE, Drugs & alcohol, Mobile Phone & PPE) are in place, visibly displayed and understood by all.	X		Н			Produce a written Mobile Phone policy and it make available to all staff and undertake training to ensure it is understood.	General Manager	01/01/2010	31/01/2010		
1.3.	Authority, accountability and responsibility for all personnel clearly defined by job position throughout the Organisation.		X									
1.4.	All employees and contractors shall have the opportunity to be actively engaged to provide input to HSSE systems and outcomes. These shall include attendance at HSSE and 'toolbox' meetings.	X			M		Involve contractors in relevant HSSE meetings.	Operations Manager	01/02/2010	28/02/2010		

The actions can be prioritised based on the risk ranking assigned to each gap. The risk ranking will be determined by the Organisation.

The complete Excel spreadsheet template will be available for download from the JIG website. This template is not compulsory and can be modified for an individual Organisation's purpose.