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GOM REGION

Contractor Health, Safety, Security and Environmental Management System (HSSE-MS) - Assessment and Retention Practice

5	11/04/2023	Revision	Shane Fruge’	Jeennifer Osterhaus
4	12/09/2021	Revision	Kenneth Rosamond	Alisa Tijerina
3	9/30/2018	Revision	Pam Tomme	Melissa Mark
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AMENDMENT RECORD

Amendment Date	Revision Number	Amender Initials	Amendment
11/02/2023	5	SF	Add quarterly TQ spot checks for contractors offshore
12/09/2021	4	S.F,	Updated links Included reviewing Helipass waiver data
9/30/2018	3	P.T.	Removed SK Evaluation Review section and attachments – this has been incorporated into the ISN RAVS section. Appendix C & G Not in Use Changed HSEMS review completion from 14 weeks to 8 weeks due to change in SK Changed RAVS Safety Programs Score to ≥90.00% from ≥80.00%
10/13/2015	2	P.T.	MOC# AMOC-GOMDW-15-0076 - Updated CAR to align with the Upstream Contractor Safety Management Procedure, SEMS, ISN Desktop Evaluation, Helipass, SK, and TQ process. Blue text represents an addition or change. See Amendment record attached. CAR Amendment Record Oct 2015.doc
12/15/2014	1	G.W	Updated document to align with the Upstream Contractor Safety Management Procedure and the GoM Production Division Contractor Management Procedure.

			Provide more guidance around SEMS requirements for contractor safety management. Provide more guidance on verification in the "During Contract" stage. Changed format of document to meet the GoM Region GOO document template requirements. Added S&K, TQ Daily, TQ Spot Check, and bridging document templates procedures as appendices to the practice.
7/15/14	0	G.W	Updated Appendix A- BP GoM Region Contractor HSE Evaluation Request Form. No MOC issued for the change.

1. Purpose

This practice describes GoM Region processes for implementing BP's OMS 2.5 Working with contractors HSSE expectations.

2. Scope

This practice applies to contractors performing activities for GoM Region offshore.

This practice does not apply to the following personnel:

- BP employees
- Media
- Universities
- Government Agencies
- BP Partners (i.e., Shell)

The following contractors are excluded from BP SEMS requirements:

- Logistics Vessel Crews (Standby vessel operators, anchor handling vessel operators, pipe-laying vessel)
- Subsea Vessel Crews (Subsea vessels and Seismic Survey Operators)
- Catering and Janitorial Service contractors
- Subcontractors
- GoM Region will consider waiving the portions of the ISN requirements for companies that may travel offshore to perform work that does not include manual labor and the persons are escorted by a BP person or designee while outdoors.

GoM Region requires contractors to verify that their subcontractors conform to BP expectations when working at GoM Region locations.

GPO Subsea Construction vessels are subject to SEMS only when they are attached to the seabed or a hydrocarbon line. GPO Subsea Construction vessels contracted to BP are typically NOT attached to the seabed or hydrocarbon lines, and therefore are not subject to the SEMS regulations and therefore not included in the Training Qualifications (TQ) process. The scope of HSSE oversight requirements for each individual subsea construction vessel is assessed and set forth in the contractual and bridging agreements and managed by the GPO Subsea Programs Team. In the event a Subsea construction vessel scope of work involves connecting to the seabed or a hydrocarbon line, the GPO Subsea Programs Team will cover the appropriate SEMS elements within the bridging agreement.

GoM Region may require contractor employees to have additional site-specific or task-specific training and skills and knowledge to work at GoM Region locations. GoM Region generally provides this additional training and maintains the training records. Contractor employees who perform safety critical activities or fill "core staffing positions" may also require additional skills and knowledge. GoM Region maintains records relating to the additional skills and knowledge required for safety critical activity/core staffing positions in CMAS and CoW.

Forms referenced in this practice are attached as appendices.

3. Acronyms, Definitions and Language

The terms in this section are specific to this practice.

Acronyms	
AP	Activity Planning
BSEE	Bureau of Safety and Environmental Enforcement
CAM	Contract Accountable Manager
CAR	Contractor Assessment & Retention Practice
CMAS	Competence Management Assurance System
CoW	Control of Work
CSM	Contractor Safety Management
EMR	Experience Modification Rate
GDP	Group Defined Practice
GoM Region	Gulf of Mexico Region
GOO	Global Operations Organization
GPO	Global Projects Organization
GWO	Global Wells Organization
HSSE	Health, Safety, Security and Environment
HIPO	High Potential Incident
IP	Improvement Plan
KPI	Key Performance Indicator
MODU	Mobile Offshore Drilling Unit
MSQ	Management System Questionnaire
OF	Operating Function
OMS	Operation Management System
PHCA	Potentially High Consequence Activity
PRM	Performance Review Meeting
PSCM	Procurement & Supply Chain Management
RAVS	Review and Verification System
RIF	Recordable Injury Frequency

Acronyms	
RFP	Request for Proposal
SK	Skills and Knowledge
SMS	Safety Management System
S&OR	Safety and Operational Risk
SPA	Single Point Accountability
SV&O	Self-Verification and Oversight
SEMS	Safety and Environmental Management System Regulation
TRIR	Total Recordable Incident Rate
TQ	Training Qualification

Definitions	
Ariba	PSCM database that includes contractor HSSE data. This system has been acquired by SAP.
BP Contractor Nonconformance	Failure to meet HSSE Pre-Qualification or Retention Criteria.
Contractor	Companies, firms and individuals who contract with GoM Region and who perform services for GoM Region.
Daily Verification	A daily verification in Helipass for passengers traveling offshore that verifies company status and employee skills and knowledge.
Desktop Review	Evaluation of a contractor's RAVS score which includes SK Review, EMR, HSSE Statistics, HSSE Culture, Drug and Alcohol requirements, TQ and TQ spot check.
Experience Modification Rate (EMR)	A comparison of a company's workers' compensation claims experience to other companies of similar size that perform a similar type of work or service. An EMR of 1.00 is considered average, while an EMR >1.00 indicates higher than average workers' compensation claims and an EMR <1.00 indicates lower than average claims. The EMR rate directly impacts an employer's workers' compensation insurance rates.
Helipass	The software for the check-in kiosks at the heliport.
HSSE Block	Is a "not approved" status in SAP. This status prevents the ability to use a contractor and to issue purchase orders.
HSSE-Management System	Framework of processes and procedures designed to assure that an organization can fulfil tasks in conformance with HSSE objectives.

Definitions	
HSSE-MS Evaluation	A documented assessment performed by examining evidence to verify: • Contractor HSSE-MS conforms to the HSSE pre-qualification or retention criteria. • Contractor HSSE-MS is being effectively implemented.
HSSE-MS Pre-Qualification Criteria	Minimum HSSE performance measures required for a contractor to be considered for working in GoM Region locations.
HSSE-MS Retention Criteria	Minimum HSSE performance measures required for a contractor to continue working in GoM Region locations.
HSSE Statistics	The contractor's Total Recordable Incident Rate and Total Number of Fatalities as reported for the entire company/corporation. If a local or regional location is represented in ISNetworld, it should be used for qualification rather than a national or international location. HSSE Stats for BP GoM Region will be calculated and reported separately from the company total.
ISNetworld	An on-line, subscription based, contractor/ supplier management database.
Management System Questionnaire (MSQ) – HSE Culture	The HSSE-MS (MSQ) questions address the contractor's: • Leadership and Commitment; • Health and Safety Policy Structure and Responsibility; • Hazard Identification and Risk Assessment Processes; • Compliance with Legal and Other Requirements; Operational Controls – Programs and Procedures: • Training and Awareness; • Subcontractor Management; • Communication and Reporting; • Key Performance Indicators and Metrics; Incident Investigation Reporting and Analysis: • Evaluations; • Management Review; • Environmental Policy and Controls; • Sustainability and Corporate Social Responsibility.
Operating Management System (OMS)	Sets out BP's principles for good operating practice.
Potential High Consequence Activity (PHCA)	An activity which, if performed improperly, could directly result a purple risk event as shown on the GDP 3.1 risk matrix.
Review and	Review and Verification Score (RAVS) checklists used by ISNetworld to evaluate

Definitions	
Verification Services (RAVS)	the HSSE-MS program content of each contractor.
SAP	Is a supplier relation Management system which BP uses to manage supply and logistics, purchase to pay, order to cash and financials.
BP SEMS requirements	Skills and Knowledge (SK) and Training Qualification (TQ) verifications
Skills and Knowledge (SK) - Review	A review of the system that each contractor uses to ensure that its employees have the appropriate skills and knowledge required to safely perform work.
Training Qualification (TQ) Spot Check	Assessment of training records for “Qualified” individual employees. Only applicable to contractors who are subject to the BP GoM Region SEMS program.

4. Roles and Responsibilities

VP

- Final approver of variance requests.

HSE Manager (Operating Function)

- Key stakeholder overseeing GoM Region CAR Process.
- Approver of IP’s (EMR & TRIR).
- Final approver of CAR

Legal

- Provides legal guidance on Contractor Health, Safety, Security and Environmental Management System (HSSE-MS) - Assessment and Retention Practice

Subject Matter Expert (SME)

- SME plays role in assisting in the application of the training requirements.
- Reviews contractor’s responses to the SMS Interface Matrix for bridging documents.

Contractor Safety Advisor:

- Defines evaluation protocols and scoring.
- Defines required Health & Safety programs and training by specific contractor category and assures sufficient qualified resources are available.
- Provides input for the SMS bridging process for GoM Region.
- Facilitates bridging document process with CAM/BP Line Representative, SME, HSE Tag, and Contractor.
- Pre-assesses contractors based on ISNetworld data.
- Evaluates contractors' HSSE-MS and assure TQ actions are entered in ISNetworld.
- Reviews evaluation findings and works with CAM/BP Line Rep and contractor companies to implement effective corrective actions.
- Receives HSSE evaluation requests, conducts HSSE-MS evaluation, and enters HSSE evaluation results and action items in ISNetworld. Notifies PSCM of status and updates status in SAP.
- Performs spot checking of contractor qualifications in ISN versus work performed offshore to assure validity of training qualifications and roles actually being performed. This will be done quarterly on GoM assests.
- Manages and analyzes data for the pre-qualification (selection) and retention of contractor companies.
- Progresses against training targets, improvement plans and action items, and contractor grading, and identifies trends.
- Monitors contractor HSSE retention KPIs to assure that contractors continue to meet the HSSE retention criteria in Table 2 (pg. 15).
- Review and distribute Helipass data.
- Advises the Line Rep, HSSE Tag and PSCM when a contractor no longer meets the HSSE retention criteria.

Regulatory

- Interprets regulatory standards impacting GoM Region operations.

PSCM:

- Manages the process of hiring Contractors including submitting Appendix A- GoM Region Contractor HSSE-MS Evaluation Request Form for new contractor.
- Notifies CSM of contractor scope changes via GoM Region Contractor HSSE-MS Evaluation Request Form (Appendix A).
- Supports Performance Review Meetings for PHCA and selected contractors.
- Second line of escalation for contractor non-conformance.

Line Rep:

- Responsible for verifying fulfilment of the Contractor's obligations under the relevant Contract, including the day-to-day operational safe delivery of the Contractor work scope at the worksite.

- Responsible for engaging with PSCM, BP Stakeholders and Contractors during the sourcing processes for new Contractors, providing the key technical input to the program of works including defining the Scope of Work and Contractor selection criteria.
- Conducts Performance Review Meetings for PHCA and selected contractors.
- First line of escalation for contractor non-conformance.

Contract Accountable Manager (CAM):

- Line Rep for Potentially High Consequence Activity (PHCA) contracts.
- OF appointed individual (a BP employee) who holds the Contractor accountable for: delivery of HSE and operational performance, and having in place an effective self-verification system.
- Conducts the PRM regarding performance

Contractors:

- Responsible for meeting BP GoM Region Contractor HSSE requirements in Table 1 by target dates.

5. GoM Region Requirements

5.1 General

This section of the practice outlines the steps GoM Region implements to assess contractor HSSE-MS as part of sourcing and retaining contractors to work at GoM Region locations. See Figure 1. This process is aligned with the GoM Region Global Operations Organization Contractor Management Procedure 2300-T2-PU-PR-0006.

PSCM will use the following process to request CSM to initiate an HSSE-MS review:

- Ensure PHCA or non-PHCA status is determined and enter that determination in Ariba database.
- Identify a Line Rep and Category Delivery Lead/Specialist accountable for the contractor performance and register that person in the Ariba database.
- Submit a HSSE-MS Request Form Appendix A - GoM Region Contractor HSSE-MS Evaluation Request Form) to CSM to conduct a review.

Completion of the HSSE-MS review can take up to 8 weeks, depending on the contractor and risk of the activities to be performed.

Figure 1 shows the workflow for utilization of contractor companies within GoM Region Sourcing, Pre-Mobilization, During the Contract, and Post Contract Evaluation

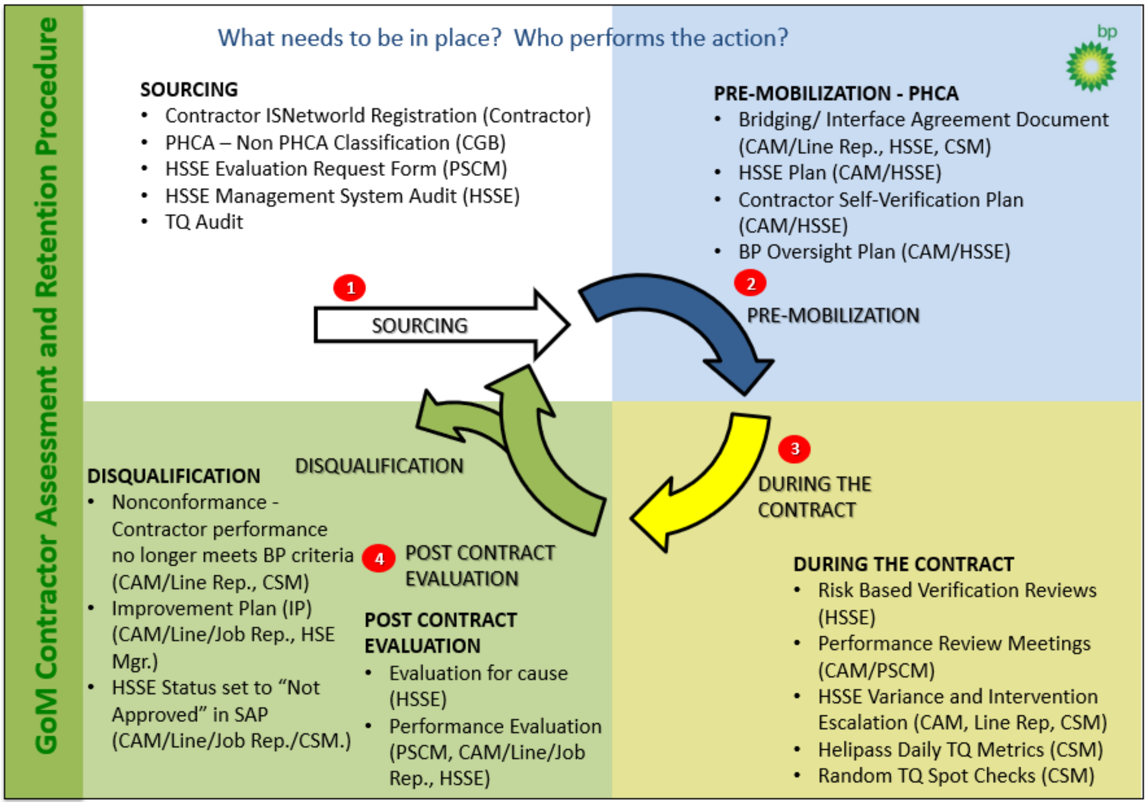


Table 1 identifies BP GoM Contractor HSSE requirements. These requirements apply to all contractors who do not fall under the exclusions outlined in Section 2: Scope.

Table 1: HSSE Requirements

HSSE Criteria	Acceptable Value	Comments
Contractor Grade (Desktop Review)	Green	Comprised of RAVS score, EMR, HSSE Statistics, HSSE Culture, Drug and Alcohol requirements
RAVS Safety Programs Score	≥80.00%	RAVS score for required HSSE-MS programs for the specific service line performed which includes SEMS required Skills and Knowledge. ISNetworld Checklists are used to review the regulatory content of the contractor's written HSSE-MS programs. ISNetworld maintains the list of required HSSE-MS programs for each contractor category.
Current EMR	≤1.00	Reported for entire company. If a local or regional location of that company is represented in ISNetworld, the EMR for that local or regional location should be used for qualification, rather than the EMR for the entire company.

HSSE Statistics Four Quarter Rolling Average- TRIR for BP GoM Region jobsites.	≤1.00	For entire company's work on behalf of BP GoM Region.
HSE Culture Score (Management Systems Questionnaire)	≥120 points	Contractors must answer all MSQ questions.
Drug & Alcohol Policy	Yes	Contractors must have a Drug & Alcohol Policy
TQ Spot Check	Complete	Requirement for contractors who fall under BP GoM Region SEMS program only
Daily TQ (Helipass)	Qualified	Verified at time of travel

5.2 Contractor Qualification and Selection (Sourcing)

During this phase, an integrated team, comprised of the Line, PSCM, HSSE and CSM, qualifies and selects contractors.

GoM Region requires contractors who fall under the BP GoM Region SEMS program to subscribe to ISNetworld, and to enter and maintain their HSSE-MS data in ISNetworld. GoM Region utilizes ISNetworld to source the data required to assess the contractor HSSE-MS, including skills and knowledge competencies and training qualifications (see Table 1).

5.2.1 Contractor HSSE-MS Evaluation Process

CSM Team shall review contractor HSSE-MS using contractor data entered into ISNetworld.

All GoM Region Contractors that are under bp contract and perform offshore work shall enter the following HSSE-MS data in ISNetworld to facilitate a desktop review:

- RAVS Safety Programs specific to the services provided in the contract
- Experience Modification Rate (EMR) Letter
- HSSE Statistics including:
  - 3-Year Total Recordable Incident Rate (TRIR) Average*
  - Total Number of Fatalities for the last 3 years
- HSE Culture through completion Management System Questionnaire (MSQ)
- Drug & Alcohol Policy

Contractors that are traveling offshore under BP GoM Region SEMS program will also be subject to the following reviews through ISNetworld:

- Skills and Knowledge – (SK) Review managed in RAVS
- Training Qualifications (TQ) specific to the worker role(s) provided in the contract - in the event the worker has more than 1 role, each role must be assigned to the individual and ust be qualified

- Training Qualification (TQ) Spot Check

Contractors utilizing subcontractors offshore must provide a Subcontractor Management Plan in ISNetworld as part of the RAVS Safety Programs.

*United Kingdom based companies that do not have a TRIR rating should complete RIDDOR Form 2508. The link to the RIDDOR Form 2508 is listed below.
RIDDOR Form 2508

5.2.2 Skills and Knowledge Verification

The purpose of the SK Verification is to assess the contractor's training framework as per SEMS and OMS 2.5 Working with Contractors.

GoM Region CSM Team shall assess the training framework of the contractors programs via ISN to verify their ability to provide employees who have the appropriate skills and knowledge required to safely perform the work.

Well Control certificates and Crane Operator certificates are required to be uploaded into ISNetworld. They will be verified to determine that the certifiates meet the requirements prior to offshore travel.

5.2.3 Training Qualification (TQ) Spot Check

GoM Region CSM Team shall assess the validity of training documentation for contractors who that are required by the BP SEMS program. This is done by performing spot checks of training records for "Qualified" individual employees who will be performing work at BP Sites.

5.2.4 Contractor HSSE Approval Status

CSM shall review the ISNetworld grading for new selected contractors (see Table 2: BP GoM Region Contractor HSSE Pre-Qualification and Retention Criteria).

GoM Region requires contractor HSSE status to be Approved (Green) or Conditionally Approved (Yellow) in the SAP Database to conduct work at GoM Region facilities.

Table 2: BP GoM Region Contractor HSSE Pre-Qualification and Retention Criteria

Status	Rationale
Approved "Green"	Indicates that a contractor meets GoM Region HSSE Pre-Qualification or HSSE Retention Criteria, whichever is applicable.
Conditionally Approved* "Yellow"	GoM Region shall issue an IP when a single grading element, mentioned in Table 1, is deficient and not remedied within 30 days.

Status	Rationale
Not Approved "Red"	GoM Region shall change contractor's status to Not Approved in SAP when more than one grading element is deficient. (Table 1 – elements not completed or did not receive the minimum grade allowed).
Not HSSE Evaluated	Those contractors who do not conduct work at GoM Region facilities will not be HSSE evaluated. GoM Region will identify those contractors as "Not HSSE Evaluated."

- PSCM maintains the PHCA contractor status in the Ariba and the Contract Information Database."

5.3 Pre-Mobilization

5.3.1 General

In the Pre-Mobilization stage, BP GoM Region determines whether the contractor and subcontractors appear to understand the risk profile of the work and the site specific HSSE requirements in order to do the work safely.

It is the contractor's responsibility to keep its company and employee status updated in ISNetworld. In addition, it is the contractor's responsibility to ensure that any employee working for BP GoM have the necessary skills and knowledge needed to perform their assigned task, are within ISN, and meet all the necessary qualifications listed for the occupational role they will be performing.

Prior to mobilization, a BP Line Rep may confirm with CSM HSE that a contractor has an HSSE approval for traveling offshore.

5.3.2 PHCA Contractor Bridging Documents

An HSSE-MS Bridging Document lists the specific HSSE policies, practices and procedures that the contractor will follow during the work activity. In order to complete the HSSE-MS Bridging Document, the Region determines whether the contractor will follow BP Region policies, practices, and procedures, or whether it will follow its own policies, practices, and procedures. The signed HSSE-MS Bridging Document becomes part of the contract between BP and the contractor.

PSCM is responsible to notify the CSM Team when a new contractor has been designated a PHCA contractor. PSCM will utilize the GoM Region CAR Procedure, *Appendix A- GoM Region Contractor HSSE Evaluation Request Form* to document the request to initiate HSSE Review.

GoM Region GWO will follow the Upstream Practice GWO Safety Management System Bridging EP SDP 2.2-0004 to prepare the HSSE-MS Bridging Document.

GoM Region GOO and GPO will follow *GoM Region* Appendix E - GOO Bridging Template to prepare the HSSE-MS Bridging Document.

CSM Team, utilizing [BP Guide 100405 – HSSE Bridging] will facilitate the process to engage the contractor and GoM Region personnel in developing the HSSE-MS Bridging Document in preparation for approval by the GoM Region CAM.

A typical workflow for developing a bridging document follows below:

- Face-to-face Bridging Induction for PHCA contractors.
- GoM Region releases draft bridging document to contractor.
- Contractor returns completed draft bridging document to GoM Region.
- GoM Region reviews draft bridging documents and contractor HSSE-MS programs.
- GoM Region and contractor complete and sign bridging document.
- GoM Region communicates completion of bridging document and retains signed bridging document in Ariba and Atlas.

5.4 During the Contract

GoM Region verifies work activities are conducted in conformance with HSE expectations. The following reviews and checks may be utilized.

5.4.1 Desktop Review

Desktop Review is an evaluation of a contractor's RAVS score, EMR, HSSE Statistics, HSSE Culture, Drug and Alcohol requirements, and the TQ and TQ spot check which occurs during the sourcing phase of a new contractor. The following triggers could prompt an additional desktop review during the performance of the contract.

- OSHA recordable
- HIPO
- BSEE recordable
- Scope change
- Upon Management or CAM request

5.4.2 Training Qualifications (TQ) Random Spot Check

GoM Region CSM Team may perform spot checks of training records via ISN for individual employees who go offshore. The objective is to verify that documentation for each training qualification exists and supports the data that is entered into ISNetworld. Appendix D - Training Qualification Assurance Procedure.

The CSM team will identify a random selection of different contractors on a monthly basis. Each monthly random selection criteria shall include:

- Non-PHCA contractor
- PHCA contractor
- Subpart O contractor
- Production Safety System contractor

The TQ Spot Check will be initiated in ISN utilizing the Action Item module or by verifying the Waiver spreadsheet via Helipass.

Underpinning the TQ Assurance Procedure is the Appendix D-2 BP TQ Matrix, which outlines the minimum HSE training required for roles that contractors perform offshore. The TQ Matrix cross references Occupational Roles and the minimum HSE training that BP requires. The published document(s) will be stored on ISN's Bulletin Board and will be available for download by the contractor at any time. CSM may receive questions from the contractor regarding which Occupational Role to map their employee to, why a TQ is required for an Occupational Role, or the frequency and depth of training BP requires. If there is a question regarding an Occupational Role, CSM may request that the contractor provide a Job Description. Upon its review, guidance may be given to the contractor. If CSM requires assistance with any of the contractor's questions, he/she may consult with a Subject Matter Expert (SME).

Accompanying the TQ Matrix is the Appendix D-3 TQ Course Description, which cites regulatory references for required training and describes BP's minimum training expectations. The document lists the name of the TQ course, provides the Activity Code assigned by ISN, cites the regulatory reference, a brief course description, frequency of training and suggested methods of obtaining training. The published document will also be stored on ISN's Bulletin Board and will be available for download by the contractor at any time.

If any of the above assessment/verification process identifies gaps, BP and the contractor shall identify actions to close the gap and track corrective TQ actions to closure.

CSM will enter TQ actions into ISNetworld for contractors to complete and track to closure.

CAM/BP Line Reps are accountable for managing the TQ action closure process for their respective assigned contractors.

5.4.3 Helipass Daily Verification

BP GoM contractor employees' ISN status will be monitored at the Heliport via the Helipass system. The Helipass system consists of a kiosk at the Heliport which will verify that each contractor employee has an acceptable company status and a "Qualified" employee status in ISN. An unacceptable company status or a "Non-Qualified" employee status will prevent the contractor employee from travelling offshore. This check does not include subcontractor employees. GoM Region requires contractors to verify that subcontractor employees comply with the same requirements as documented in the Skills and Knowledge Review. When a contractor company starts work with BP GoM, it is notified by CSM that there is a requirement to do the following:

1. Complete Desktop Review.
2. Have its employees assigned to an occupational role on the BP GoM Region Training Qualification (TQ) Matrix in ISNetworld and
3. Ensure that the training record (including dates of the latest training) for each contractor employee is up to date prior to conducting work offshore.

5.4.4 Performance Review Meeting (PRM)

When requested, CSM provides HSSE-MS and Daily TQ data to support PSCM/HSSE in a formal Performance Review Meeting (PRM). For more details see the *BP procedure Upstream Contractor Management Procedure, document # 100550*

CSM may provide assurance in performing self-verifications of PRM's. See Appendix H: GOO SV PHCA PRM for more details

5.5 Post Contract

When requested, CSM provides HSSE-MS and Daily TQ data to support PSCM/HSSE in a post contract evaluation. For more details see the *BP procedure Upstream Contractor Management Procedure, document # 100550.*

6. Escalation

6.1 HSSE Variance and Intervention Escalation

GoM Region requires contractors to maintain and report their HSSE-MS performance to meet retention criteria defined in Table 2: BP GoM Region Contractor HSSE Pre-Qualification and Retention Criteria and any agreed KPIs. Failure to meet or report HSSE-MS performance will result in the contractor being labeled as BP Contractor Nonconformance and as Not Approved (HSSE Block) in SAP.

For contractorsthat are considered to be Nonconformant, GoM Region may intervene, up to issuing Stop Work orders, in order to address contractor HSSE performance. The following steps may be taken to address the HSSE-MS gaps. The decision would be made by CAM/PSCM.

6.1.1 Performance Discussion

A performance discussion is a first response for a contractor that has been deemed to be Nonconformant. The CAM/Line Representative is responsible for initiating the discussion and follow-up as appropriate.

6.1.2 Improvement Plan

The CAM/Line Representative may prepare an Improvement Plan (IP) to specifically address identified contractor HSSE performance issues. IPs are developed, implemented and communicated to mitigate the risks and to verify that the OF HSE Manager approves the proposed mitigation measures. The proposed IP must be approved by the OF HSE Manager. The CAM/Line Representative is then accountable to work with the contractor to agree the IP and verify action item closure. The CAM/BP Line Representative is accountable for verifying the contractor complies with the IP. The designated time period for an IP shall not exceed 45 days, except in cases where the HSE Statistics (TRIR) or EMR Rating are the cause of the Nonconformance, in which case the designated time period for the IP shall not exceed 365 days. The IP will be uploaded into ISNetworld by CSM Advisor.

6.1.3 Variance

If a contractor has not met the BP HSSE requirements defined in Tables 2: BP GoM Region Contractor HSSE Pre-Qualification and Retention Criteria, or has a RED status in ISN, then a variance is required before that contractor can travel offshore for the GP GoM Region. An approved variance requires the contractor have an IP prior to starting work. The designated time period for a variance shall not exceed 45 days from the time the form is signed and implemented. Variance must be approved by the VP-Function.

6.1.4 Variance

The CAM/BP Line Representative may request an IP or Variance to the pre-qualification HSSE criteria, defined in *Table 1- HSSE Requirements*, using Appendix B- BP GoM Region Contractor HSSE Improvement Plan/ Variance Form.

GoM Region uses this process to verify that potential HSSE risks in using a contractor that does not meet GoM Region HSSE-MS requirements are understood and mitigated.

The CAM/BP Line Representative is accountable for initiating and verifying that the contractor complies with the IP/Variance.

The CAM shall designate the time period of the Variance. The Variance time period shall not exceed 45 days from the time the form is signed and implemented. The Improvement Plan time period shall not exceed 45 days from the time the form is signed and implemented except in the case of EMR or TRIR in which case it shall not exceed 365 days.

If a variance is not approved, the contractor HSSE status shall be not approved for work. The following tables identify the IP/Variance process:

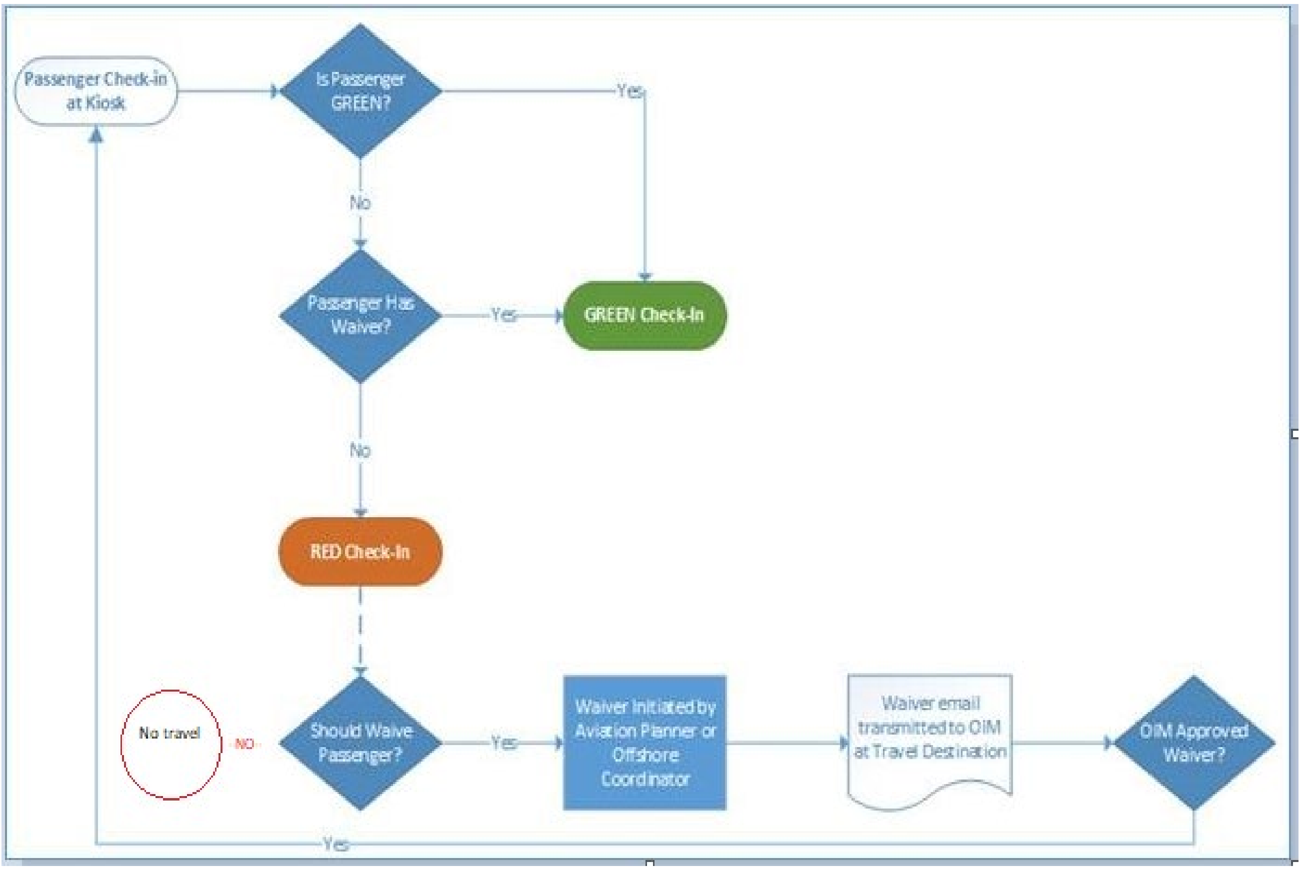
NOTE:

- Requires inal HSE Manager (Function) approval.
- If the IP expires, a variance will be required to go offshore.
- If a contractor has two or more IP's a variance is required to go offshore.
- Variance requires final VP approval.

6.3 Helipass Waiver Process

A waiver may be granted for individuals not meeting the Helipass requirements in order to travel offshore to a BP Managed Site. The waiver process requires OIM/WSL approval.

6.3.1 Helipass Waiver Process Work Flow



7. Reference Documents

- Upstream Contractor Safety Management Procedure, document # 100550
- GoM PSCM Supplier Approval Procedure 2300-T2-PU-PR-0004
- Safety & Environmental Management System (SEMS) Program 2000-T2-RG-SR-0001.
- BP Procedure 100084 Upstream Category Management
- BP Guide 100441 – Contractor Self-verification and BP Oversight Plans
- BP Guide 100332 Upstream Contractor Performance Management – Roles and Responsibilities
- BP Guide 100405 - HSSE Bridging

8. Appendix A – GoM Region Contractor HSSE-MS Evaluation Request Form

GoM Region Contractor HSSE-MS Evaluation Request Form

9. Appendix B – BP GoM Region Contractor HSSE Improvement Plan (IP)/Variance Form

BP GoM Region Contractor HSSE Improvement Plan/ Variance Form

10. Appendix D- Training Qualification Assurance Procedure

Training Qualification Assurance Procedure

Appendix D-2: TQ Matrix

TQ Matrix

Appendix D-3: TQ Course Description

TQ Course Description

11. Appendix E - GOO Bridging Template

PHCA Bridging Template

12. Appendix F - Non-Conformance Process

Non-Conformance Process

Administrative MOC

= Required Field

MOC #:	AMOC-GOMDW-15-0078
Date Initiated:	9/8/2015
Initiator:	Bryant, Christopher J
Stage:	Implementations
Status:	Approved

Facility:	GoM	Expected Implementation Date:	10/13/2015
System	GoM-Wide	MOC Duration:	Permanent / Temporary
Verifier/Coordinator:	GoM Verifiers		

Title:

Contractor Assessment and Retention Revision 3

Scope:

Update document to align with the Upstream Contractor Safety Management Procedure and the GoM Production Division Contractor Management Procedure. Provide more guidance on the processes utilized by Contractor Safety Management to vet contractors in accordance with SEMS requirements. Provide more guidance on the processes to vet contractors during the sourcing phase of the contractor qualification and selection process. Provide more guidance on the processes utilized to monitor and verify contractor performance during the contract phase of the contractor qualification and selection process. Updated processes as result of the change: Contractor Scorecard in ISN measures contractor performance for each of the required HSSE-MS elements. Helipass: method to assess offshore travel status. TQ Matrix and TQ Course Description: updated based on approved changes to align with industry standards. SK Review and TQ Procedures: updated based on software improvements to the ISNetworld operating system. Non-Conformance Process: updated to reflect changes in the process to verify and monitor contractor performance. Reviewers: Farley Burge, David Barker, Edgar Molina, Abhijit Malegaonkar, Mike Bush, Curtis Anderson, Wendy Goodman, Pam Tomme Approver: Melissa Mark

Justification:

Reason for the Change: To integrate updates to the contractor verification process within the CAR Practice. Other factors contributing to the need to implement this change: Requested improvements in ISN to measure contractor performance. Other technology enhancements implemented by ISNetworld to their software system. Development of the Helipass process. Streamline of the process for Contractor Safety Management to qualify contractors.

Risk/Mitigation (attach risk documentation where appropriate):

Affected Parties:
Contractor Safety Management Team, CAMs, Job Representatives, Line Representatives, HSSE, PSCM and Contractors involved with work performed within the GoM Region.

Method of Implementation/Roll-out: See attached documents
Face to Face presentation with PSCM stakeholder leaders in GOO, GWO and GPO.
Email communication to GoM employees.
Publish updated practice in Atlas under OMS Navigation 2.5 Working with Contractors.

		Completed On	Completed By
Proceed with MOC?	Yes / No/Cancel / Clarify	10/12/2015	Arquiett, Candy L

MOC Reviews

AMOC-GOMDW-15-0075 = Required Field

= Reviews have been created but not issued

MOC #:	AMOC-GOMDW-15-0078
Date Initiated:	9/8/2015
Initiator:	Bryant, Christopher J
Stage:	Implementations
Status:	Approved

Reviews Due Date

Review	Responsible Person	Complete	Completed On	Completed By
Senior Counsel	Burge, Farley	Agree / Disagree		Burge, Farley
Project Procurement Manager	Barker, David C	Agree / Disagree		Barker, David C
PSCM GOM GOO Category Delivery Director	Molina, Edgar M	Agree / Disagree		Molina, Edgar M
GoM GPO Subsea HSSE Manager	Bush, Mike	Agree / Disagree		Bush, Mike
Global Wells Organization, HSE Manager, Go	Anderson, Curtis P	Agree / Disagree		Anderson, Curtis P
Regional SEMS Manager	Goodman, Wendy	Agree / Disagree		Goodman, Wendy
GoM HSE Programs Team Lead	Tomme, Pamela R	Agree / Disagree		Tomme, Pamela R
		Agree / Disagree		
		Agree / Disagree		
		Agree / Disagree		

MOC Approval

= Required Field

= Approvals have been created but not issued

MOC #:	AMOC-GOMDW-15-0078
Date Initiated:	9/8/2015
Initiator:	Bryant, Christopher J
Stage:	Implementations
Status:	Approved

Please select the approval levels required for this MOC. ☑ Level 1 ☐ Level 2 ☐ Level 3

Level 1 Approvals

Approver	Disposition	Date	Approved By
Mark, Melissa A	Approve / Cancel / Clarify	11/2/2015	Arquiett, Candy L
	Approve / Cancel / Clarify		
	Approve / Cancel / Clarify		

Level 2 Approvals

Level 3 Approvals

MOC #: AMOC-GOMDW-15-0078

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Document Lifecycle Tree

Navigate through the form and click on the last box you ended through below selection process

START

Are you proposing to create / revise /supersede / obsolete a document containing **mandatory requirements** [(1)] **or guides** [(2)] which impact one or more of GOO GoM teams?

- YES → Is the document site / facility specific or regional engineering practice [(3)]?
- NO → Out of Scope. RCT approval not required. Check here ☐ and embed this form in document → END

Is the document site / facility specific or regional engineering practice [(3)]?

- YES → Out of Scope. RCT approval not required. Check here ☐ and embed this form in document → END
- NO → Is the document supporting (for revised or obsoleted doc) or intended to support (for new doc) conformance to / implementation of an OMS Group Essential or existing BP Practice, BP Procedure or BP Guide?

Is the document supporting (for revised or obsoleted doc) or intended to support (for new doc) conformance to / implementation of an OMS Group Essential or existing BP Practice, BP Procedure or BP Guide?

- YES → Is this complete [(4)] or technical [(5)] change to existing document?
- NO → Out of Scope. RCT approval not required. Check here ☐ and embed this form in document → END

Is this complete [(4)] or technical [(5)] change to existing document?

- YES → IN SCOPE. Check here ☐ and
  a) complete GOO GoM PID template
  b) obtain OMS RCT [(6)] approval of PID and email approved PID to gomoperationsimdc@bp.com
  → END
- NO → Out of Scope. RCT approval not required. Check here ☐ and embed this form in document → END

(1) Mandatory requirements are: 'Shall', 'Must', 'Need to' or 'Required to' type statements.

(2) Guides containing 'Should' or 'Recommended that' type statements.

(3) E.g.: Site Operating Procedures (SOPs), Emergency Response Plans (ERPs), REP, Maintenance and Inspection documents.

(4) Complete - New or significant changes to existing document (incl. superseding, obsoleting) (5) Technical - Changes impact the intent of one or more requirements

(6) Identify GoM OMS RCT here. RCT approved PID needs to be emailed no later than two weeks before quarterly DGB Meeting to be considered for review. See DGB meeting schedule here.