

	<h1>ASSESSMENT</h1>	<h1>POLICY</h1> <p><input checked="" type="checkbox"/> Approved for Publication</p>
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1. Purpose

This policy provides a documented, consistent and systematic approach to assessment of various types of documents submitted to NOPSA. This policy is supported by, and can be read in conjunction with, separate policies for each type of assessment conducted.

2. Scope

This policy applies to the assessment of safety cases, field development plans, scopes of validation, validation statements, pipeline safety management plans and diving submissions.

3. Assessment Principles

NOPSA has a regulatory obligation to assess a range of documents submitted by an operator. The outcomes of assessment contribute to development of the ongoing inspection for the facility or activity. Information gained from inspection and investigation may be used to inform the assessment. NOPSA will continue to build on its knowledge and experience of dealing with an operator to help it assess subsequent submissions. However, assessment is not an isolated or “one-off” process, but forms part of an on-going strategy for dealing with offshore petroleum and greenhouse gas facilities.

The *Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2009* [OPGG(S) Regulations] require the operator to make a commitment to ongoing improvement of all aspects of the operator’s safety management system. Further, the OPGGS(S) Regulations require the operator to implement control measures that reduce risks as low as reasonably practicable. During the assessment process NOPSA will consider whether the operator has made all practicable improvements during and as a result of the preparation of the safety case.

The following principles apply to the entire assessment process for all types of assessment activities. These principles provide procedural direction and guidance for personnel involved in the assessment process.

4.1. All information contained in submissions provided for assessment will be treated as confidential, within the limits of FOI

As is normal NOPSA Policy, any information provided within any submission for assessment, or provided to NOPSA during the assessment process shall be treated as confidential. Unless compelled to do so by law, NOPSA will not publicly disclose any information provided to it, except with the express permission of the operator.

4.2. Each assessment will be fair and technically competent

The assessment, and subsequent conclusions, must be fair and technically competent. To ensure fairness, assessment will be undertaken in accordance with specified procedures that meet the requirements of the legislation and are consistent with guidelines, including the Safety Case Guidance Notes.

The NOPSA core processes contain the guidance and operational procedures for the assessment teams and supporting personnel involved in processing and assessing submissions from operators. As such, it must meet the requirements of the legislation. All assessment processes will be consistent with information and interpretations previously provided to stakeholders via NOPSA guidance and alerts.

Each Assessment will be conducted by an assessment team with the appropriate skills and competencies. The assessment team will have (or have access to) an appropriate combination of technical and operational expertise and experience to perform their allocated roles. In addition, all assessment team members will receive training to ensure that they are competent in the use of NOPSA core processes.

4.3. There will be consistency between different assessments

Any individual assessment must be carried out in a manner that is consistent with other assessments, regardless of when they occurred or who carried them out (allowing for continual improvement of operator's safety and NOPSA's processes over time). This will be achieved by:

- Use of the NOPSA assessment processes for all assessments.
- Use of an assessment team with appropriate combination of technical and operational expertise and experience.
- Use of Team Leaders and other Representatives of the Safety Authority (RSAs) to ensure consistency of assessment across operators.
- Use of external specialists in areas where NOPSA has insufficient in-house knowledge.
- Structured capture and sharing of knowledge and lessons from assessments within and between assessment teams.

4.4. Assessment processes will be transparent

The assessment process and the resultant conclusions must be sufficiently transparent to enable affected parties such as the operator and members of the workforce to understand the basis of NOPSA's decisions and actions in relation to assessment. Appropriate documentation must be maintained to enable any decision to be audited. This will be achieved by the following:

- The assessment team will be selected on specified grounds and the Lead Assessor made known to the operator.
- The assessment process shall employ the structured approach and criteria defined in NOPSA procedures and guidelines.
- Any deviations from documented procedures must be approved and recorded in the relevant assessment file.
- NOPSA will provide the results of its assessment, the conclusions drawn and the reasons for these to the operator upon completion of the assessment.
- NOPSA's decisions and actions will be confirmed in writing to the operator, including the action to be taken by NOPSA and what is expected from the operator.
- Significant findings that may affect the decision will be communicated to the operator as soon as possible.

4.5. Good project management practices will be applied

The assessment of each submission will be project managed. NOPSA has appointed a Project Coordinator to coordinate and monitor all assessment processes. A specific assessment plan will be developed by the Lead Assessor for each submission in accordance with NOPSA guidelines. Progress against the plan will be monitored to ensure that the assessment is completed within an appropriate time frame, with the allocated resources to the required standard.

Each assessment will be managed by a Lead Assessor who will be the primary responsible person for assessment and the point of contact for the operator for communications about the process. The Lead Assessor has the principal responsibility to ensure that the assessment is conducted according to NOPSA procedures. The operator will be informed of the name and contact details of the Lead Assessor following receipt of the submission.

Assessors working as assessment team members are still empowered as OHS inspectors and must act accordingly at all times.

4.6. Good quality management practices will be applied

The assessment process will be subject to QA/QC and adequate review to ensure sound technical judgement and compliance with procedures.

QC/QA processes are embedded into the assessment processes to ensure procedural compliance. The inherent QC/QA processes will be supplemented by a system of audits (in accordance with the QMS) to ensure procedural compliance is being maintained.

4.7. The detail of assessments will be proportional to the level of risk

The amount of effort that will need to be expended in order to be satisfied about the operator's compliance with the legislation will depend, to some extent, on the size and complexity of the facility. Effort is focussed on those areas of the facility and those activities that contribute the largest proportion of the risk, and on those control measures and those aspects of the safety management system that are the most critical to risk control.

Initial planning of the assessments will assign more resources and effort to facilities or modifications that are large and complex. NOPSA will make this judgement based on its existing knowledge of the facility and the content of the safety case.

In the legislated timeframe, NOPSA is unable to assess every aspect of a submission when it is received, but will carry out such evaluations as are necessary to gain sufficient assurance on which to base an assessment decision. The content of critical procedures and methodologies may not be assessed in total, but these procedures and methodologies may be assessed and verified by sampling. This sampling will be focussed on providing sufficient assurance that the procedures and methodologies will be fit for purpose.

4.8. The results of assessment will be presented to relevant stakeholders

At the conclusion of the assessment the operator and, where appropriate, the Health and Safety Representatives (HSR) will be briefed on the assessment results, any immediate action to be taken by NOPSA and what is expected from the operator. Any verbal briefings will be supported in writing.

Should any serious issues be identified during the course of the assessment that may lead to a refusal, the operator will be informed as soon as possible so that there is opportunity to rectify the issue in accordance with the legislation.

4.9. Actions taken in response to findings will be graduated, and proportionate to the risk

Any deficiencies in a submission that are identified will be made known to the operator and suitable actions and a timeframe for resolution agreed. However, action on a gross deficiency in the submission cannot be delayed until after the assessment process is completed and must be addressed with the operator in a timely manner. If gross deficiency in the submission is suspected, this must be clarified by the assessor in a timely manner prior to any action being taken.

The discovery of any deficiency in safety control will require a response from NOPSA proportionate to the perceived risk and consistent with the NOPSA Compliance and Enforcement Policy. OHS inspectors engaged in assessment activities must still comply with standard operating procedures, thus any issues that are believed to pose an immediate risk to health and safety must be addressed immediately via the appropriate enforcement tool.

The enforcement of any deficiencies in the submission, and the resultant actions by NOPSA, will be proportionate to the perceived risk as judged by NOPSA.

4.10. Assessment of Competency

Assessments will generally include a review of the commitments in relation to competency; including (for safety cases) the requirement to meet the requirements of OPGGS(S) regulation 2.9 *Members of the workforce must be competent*. Where relevant nationally endorsed competencies are reasonably available, NOPSA expects operators to adopt those competency schemes, unless they can clearly demonstrate that they have more effective systems, based on other recognised standards, in place. As a matter of policy, and in light of the specific risks associated with lifting operations, NOPSA will apply this assessment to competency of crane operators, in particular, and assess competency schemes for suitability. Assessments may include consideration against nationally endorsed Units of Competence such as PMASUP305A *Operate Offshore Cranes*.

4.11. Working with other Agencies

NOPSA have established working relationships with relevant State and Territory Designated Authorities and other relevant agencies to facilitate cooperation and consultation associated with assessment activities. Memoranda of Understanding (MOUs) have been developed with these agencies to outline the cooperative arrangements of both parties.

Relevant agencies with which NOPSA has an MOU will be advised of acceptance of safety cases, DSMSs or diving project plans and PSMPs, including any revisions. Notification will also be provided of intention to reject, or actual rejection of a safety case, diving safety management system or diving project plan, including the reasons for the rejection; intention to withdraw, or actual withdrawal of the acceptance of a safety case, diving safety management system or diving project plan, including the reasons for withdrawal.

4.12. Use of Data obtained from Assessment

NOPSA will use the information gathered during assessment to guide inspection and investigation activities. This will be used to monitor continuous improvement of operators to allow benchmarking of the industry (and individual operators) through various organisations including:

- Australian Petroleum Production and Exploration Association (APPEA),
- Oil and Gas Producers (OGP),
- International Association of Drilling Contractors (IADC),
- International Marine Contractors Association (IMCA) and
- International Regulators Forum (IRF).

Information held by NOPSA from assessment may be provided to other relevant government agencies.

4. Related documents

- N-04100-PL0243 - Field Development Plan Assessment
- N-04200-PL0268 - Validation
- N-04300-PL0052 - Safety Case Assessment
- N-04400-PL0053 - Pipeline Safety Management Plan Assessment
- N-04500-PL0054 - Diving Submission Assessment

For lower level documents, refer to the Related Documents section of the policy documents listed above.