



# Regulating Industrial Hygiene Offshore

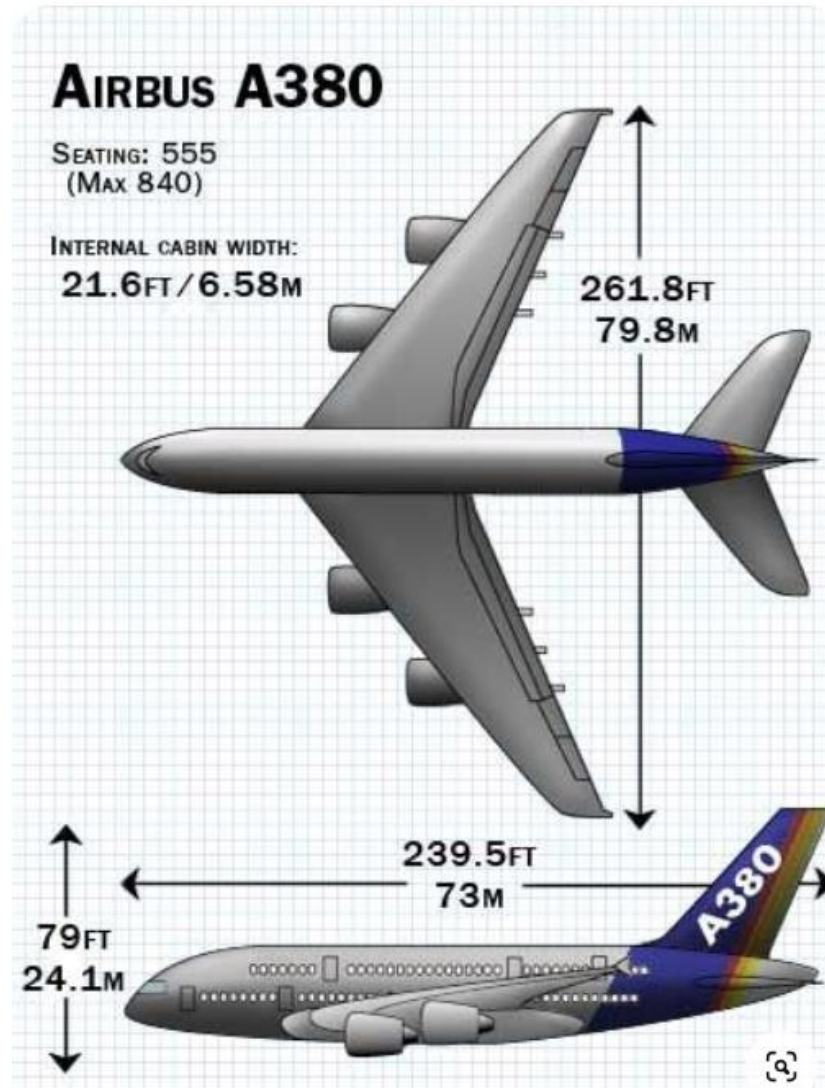
## Proactive & Reactive



**Neil Grace – Industrial Hygiene Team Lead**

Principal Inspector – Industrial Hygiene - Energy Division

# Annual Deaths from Work Related ill Health?



# Annual Deaths from Work Related ill Health?



# 10 Year Strategy & Business Plan



## The Challenge



**12k**

Lung disease deaths each year estimated to be linked to past exposures at work



**1.8 million**

Working people suffering from work-related ill health



**123**

Workers killed at work



**0.6 million**

Workers sustaining a non-fatal injury (Labour Force Survey)



**0.9 million**

Workers suffering from work-related stress, depression or anxiety in 2021/22



**0.6 million**

Workers suffering from a work-related illness caused or made worse by the effects of the pandemic

## Reduce work-related ill health

- In 2023/24, HSE will undertake important work to enable employers to take action to prevent work-related ill health and design out the risks



**Reduce work-related ill health,  
with a specific focus on mental  
health and stress**

### Our strategy and objectives

The world of work is changing, and HSE's mission is expanding. In 2022 we published our ten-year strategy *Protecting People and Places: HSE Strategy 2022-2032*. This is a strategy that reflects both our broad, existing role alongside our increasing provision of public assurance across a range of wider health and safety and environmental issues.

**Industrial Hygiene Team**  
**Offshore Safety Case – MAH vs Health?**  
**Permissioning Regime**  
**Investigations**  
**2023/24 Inspection Plan**  
**IH Enforcement Statistics**  
**Working with Industry - IH Inspection Guides**  
**Asbestos Campaign - DTM**



# Your HSE IH Team...



Steve Clarke



Neil Grace



Asif Parkar

# Regulating Industrial Hygiene Offshore

- **Offshore Installations (Safety Case) Regulations...** requires a safety case to demonstrate that the duty holder's management systems are adequate to ensure compliance with the relevant statutory provisions
- Brought in following the Public Enquiry into the Piper Alpha disaster via the Cullen Report, **which focused on controlling Major Accident Hazards (MAHs)**
- **So how does "Health" fit into this remit offshore?**
- *A safety case which does not include occupational health elements in the descriptions of the safety management system is therefore unlikely to demonstrate that the management system is adequate.*
- Health risk is an important part of the offshore permissioning regime, requires demonstration that their SMS complies with the statutory requirements of the regulations covering health risks.



# Safety cases - Permissioning

- Occupational health is the creation of a state of physical, mental and social wellbeing of the workers in the working environment.
- The aims should be to promote, protect and maintain...
- Health & Hygiene is reviewed under 5 headings within a Safety Case:
  - » OH1 – Specialist Advice
  - » OH2 – Recognition, Evaluation & Control of hazards and risks to health
  - » OH3 – Health care & First Aid
  - » OH4 – Welfare & Accommodation
  - » OH5 – Decommissioning & Dismantlement

Offshore Major Accident Regulator	Offshore Petroleum Regulator for Environment & Decommissioning	HSE
Safety Case Topic Assessment Guide:  Industrial Hygiene		
Case Title	<input type="text"/>	
Duty Holder	<input type="text"/>	
Topic Assessor	<input type="text"/>	
COIN Reference	<input type="text"/>	
CAP Reference	<input type="text" value="[Cap number]"/>	

# HSE Investigations...Reactive

We investigate reportable injuries, diseases, dangerous occurrences and concerns raised by workers, the public or others helps us improve H&S standards.

- **How do we investigate?**
  - We gather and establish the facts
  - identify immediate and underlying causes and lessons to be learned
  - take actions to prevent recurrence
  - identify any breaches of legislation
  - consider appropriate enforcement
  - An investigation may range from a single inspector to a team of inspectors.

## HSE Offshore Planned Inspections...

- **IH Inspection Plan 23/24 (Apr-Mar)**

- » **27 Offshore Interventions**

- » **7 HQ Inspections**

- » **Specific topic focus**

- » **Health Risk Strategy**

- » **CoSHH**

- » **Water Management**

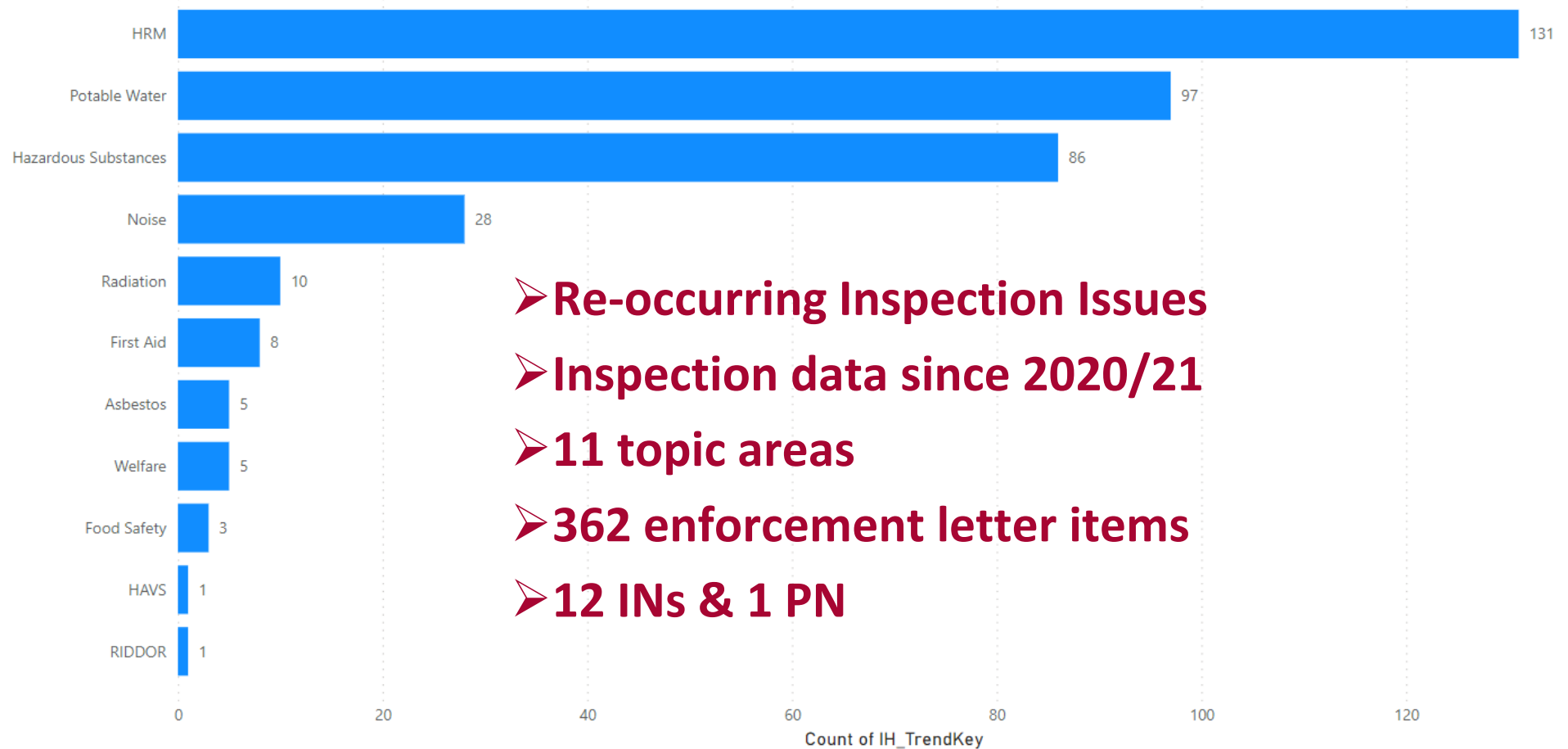
- » **Noise - control at source**

- » **Asbestos “duty to manage”**

29 03 2022



# HSE Offshore Planned Inspections...



- Re-occurring Inspection Issues
- Inspection data since 2020/21
- 11 topic areas
- 362 enforcement letter items
- 12 INs & 1 PN

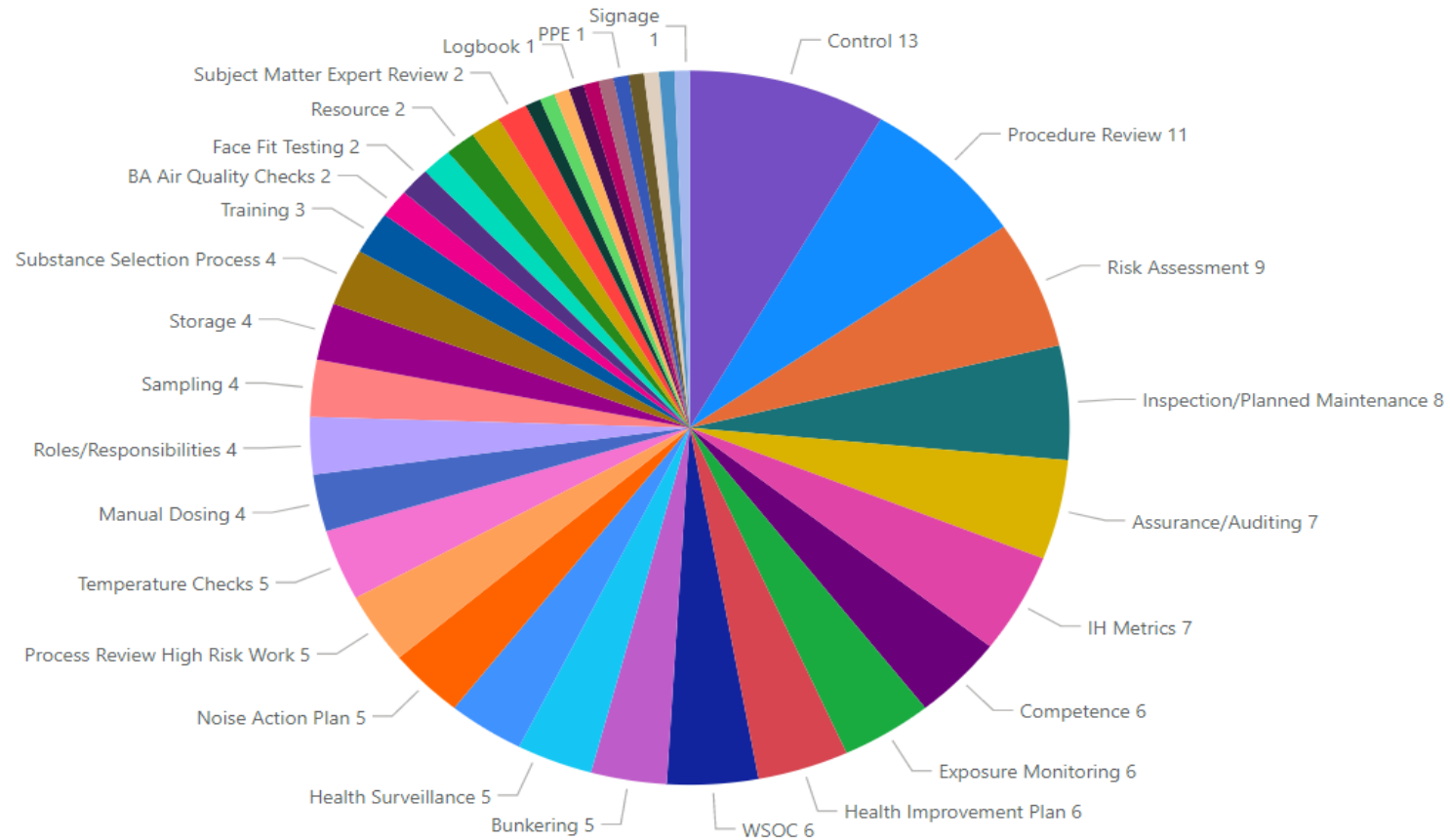
tyholder/Asset

Planning Year

Number of IN's	Number of PN's	Number of Letter Items
<b>12</b>	<b>1</b>	<b>362</b>

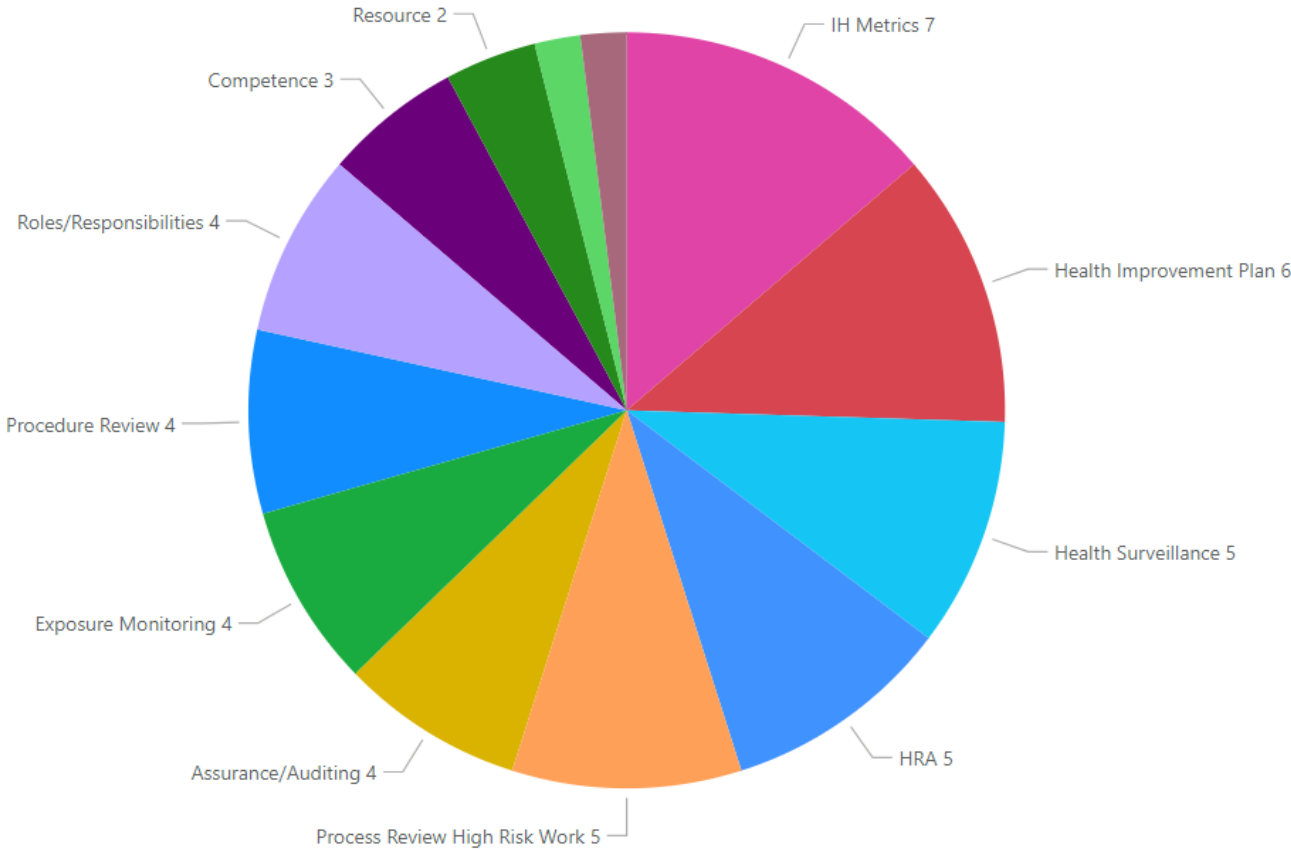


# Total IH Enforcement 2022/23



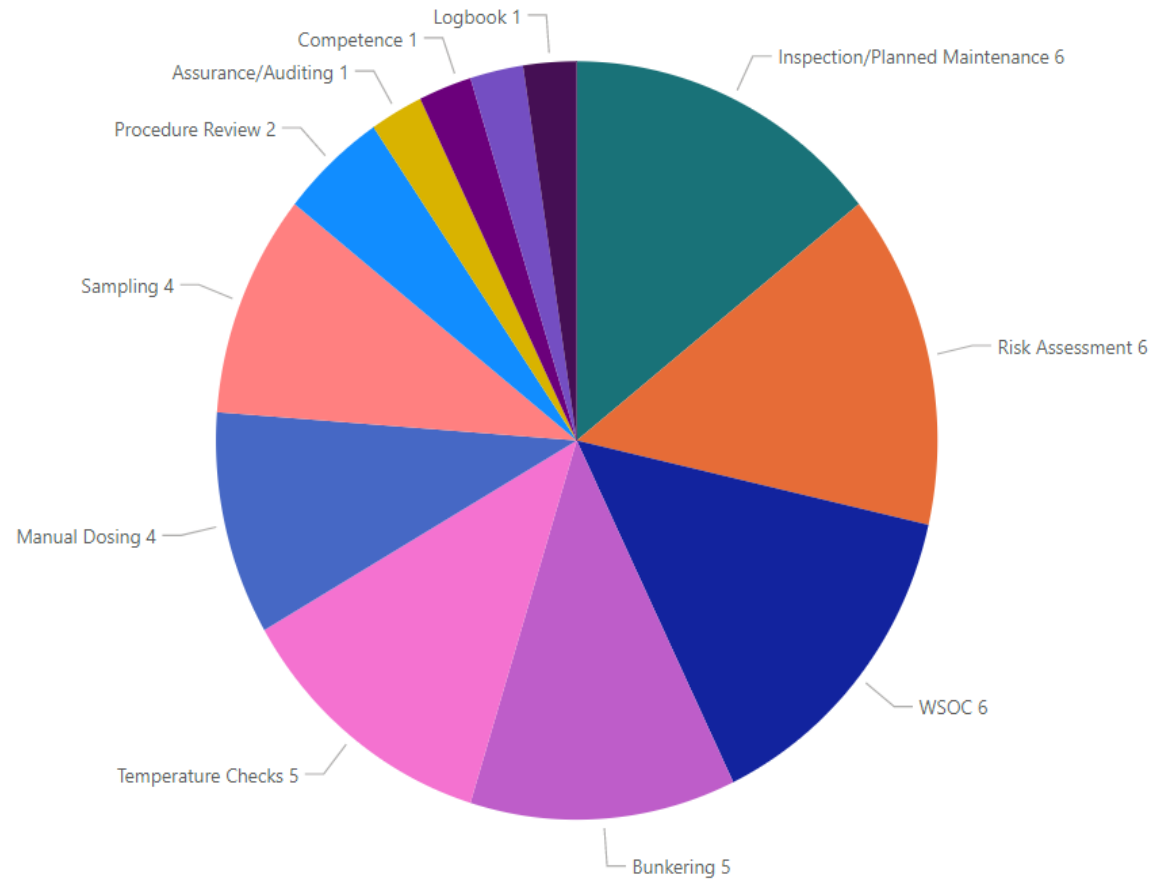
<input type="text"/>	<input type="text" value="2022/2023"/>	Number of IN's	Number of PN's	Number of Letter Items
<input type="text"/>		<b>6</b>	<b>1</b>	<b>148</b>

# Health Risk Enforcement 2022/23



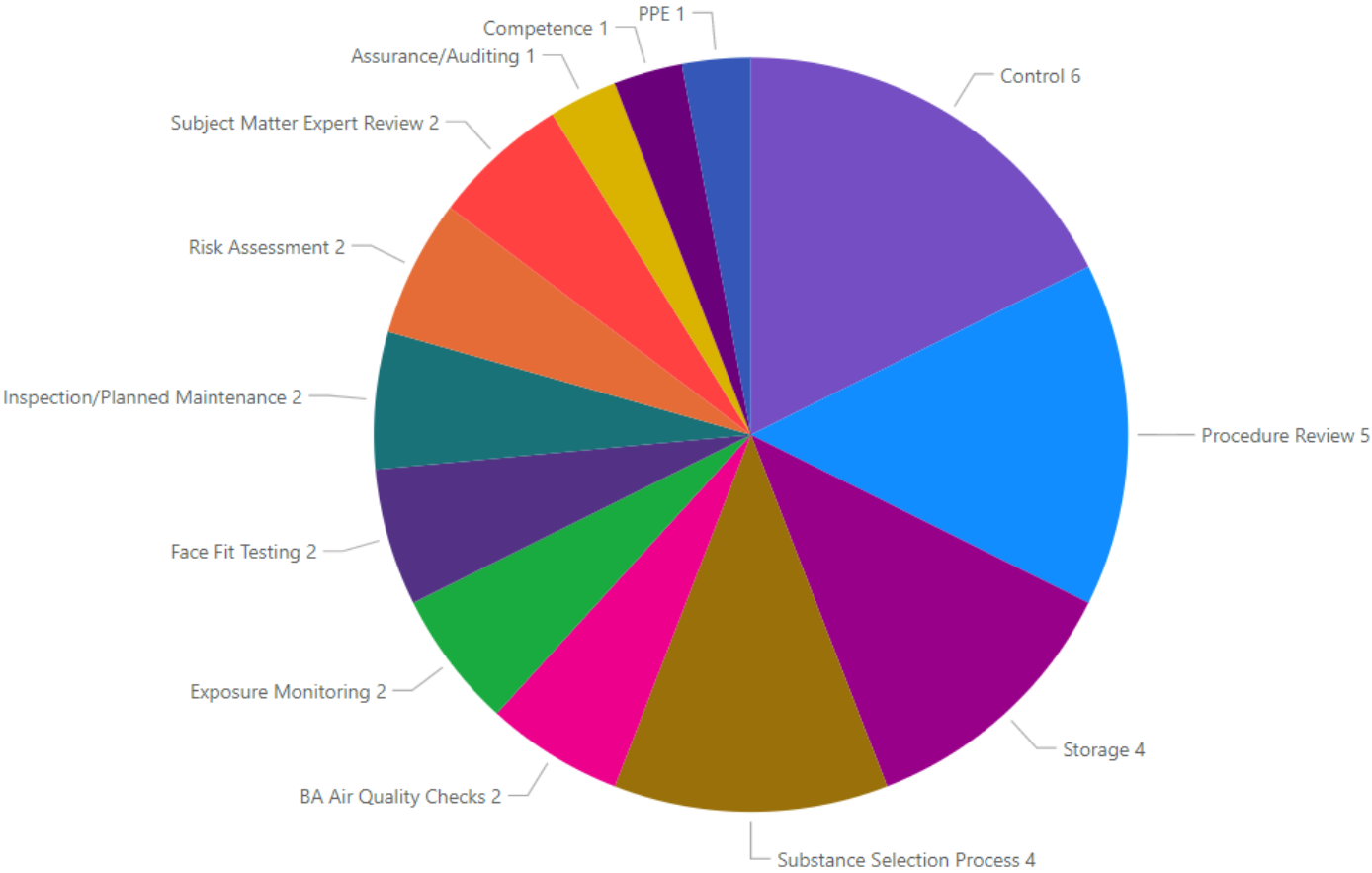
<input type="text"/>	<input type="text" value="2022/2023"/>	Number of IN's	Number of PN's	Number of Letter Items
<input type="text"/>		--	--	51

# Water Management Enforcement 2022/23



Planning Year		Number of IN's	Number of PN's	Number of Letter Items
<input type="text"/>	2022/2023	1	--	41

# COSHH Enforcement 2022/23



Planning Year  
2022/2023

Number of IN's	Number of PN's	Number of Letter Items
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## **Working with Industry...**

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- **As this data was building-up we proactively communicated with the industry on specific findings**
- **Highlighting the areas requiring extra effort**
- **Actions taken to draft new inspection guides**
- **Update and improve topic assessment guides**
- **Share, communicate & consult with industry**
- **Keep raising awareness re Health & Hygiene offshore**

# Working with Industry - Inspection Guides



- There were 23 inspection guides in total (all topics)
- Only one health guide (Noise & HAVS)
- Following the IH inspection data...
- More were required for raising awareness & consistency
- 3 new guides were published in 2022
  - Health Risk Management
  - CoSHH
  - Water Management

OFFSHORE MAJOR ACCIDENT REGULATOR

Offshore Petroleum Regulator  
for Environment & Decommissioning

**HSE**

## The Offshore Health Risk Management Inspection Guide

**Open Government Status**  
Fully Open

**Publication Date**  
May 2022

**Review Date**  
May 2025

**Review History**

Date	Changes

**Target Audience**  
OMAR Inspectors / ED Offshore Inspectors / ED Specialist Inspectors



# Inspection Guides



- 2023
- Updated & Issued the Noise & Vibration Inspection Guide (IG)
- Issued new IG for Radiation Management
- 2024
- Asbestos Management IG completed internal HSE consultation
- External consultation started with industry at the beginning of February
- Food Safety IG currently being drafted

OFFSHORE MAJOR ACCIDENT REGULATOR



Offshore Petroleum Regulator  
for Environment & Decommissioning



**The Offshore Health Risk Management  
Inspection Guide**

*Open Government Status*  
Fully Open

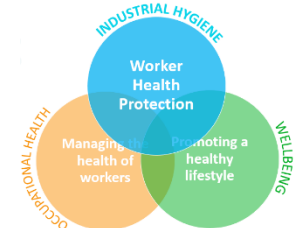
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# Asbestos Inspections - Duty to Manage



- Select committee findings published 2022, HSE report for School inspections published in 2023
- Asbestos “Your Duty” campaign was launched onshore on the 15<sup>th</sup> January 2024
- HSE’s Offshore business plan includes asbestos management focus in the 24/25 work year
- This adds into the work we already undertake as a high priority, ASB5 notification reviews and inspection for offshore licensed asbestos work
- To ensure we target risk, a triage approach has now been developed, the plan is to roll this out from April 2024 across all the UKCS operators.



House of Commons  
Work and Pensions Committee

## The Health and Safety Executive’s approach to asbestos management

Sixth Report of Session 2021–22

*Report, together with formal minutes relating to the report*

*Ordered by the House of Commons to be printed 30 March 2022*

**ASBESTOS**  
**YOUR DUTY**

## Asbestos Inspections – Duty to Manage

- First stage – operators will receive an electronic questionnaire to complete within a certain period.
- There will be some general questions on H&S management, and more detailed questions on asbestos management.
- These will be collated and reviewed and “triaged” based on the risk profile.
- Second stage – operators will be contacted with a request for specific documents, which will undergo a review utilising a defined question set.
- Third Stage - followed up by a short call to a specific installation’s OIM to ask further questions.
- Any highlighted ‘red flags’ from this work will then be reviewed by the IH team to assess compliance and determine if and what regulatory action may be required.



**ASBESTOS**  
**YOUR DUTY**

**Thank You**

