

Order 34 Audit 2020 Review

NSW Coal Operations CHPPs



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Agenda



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Introduction

- The topic areas were determined following feedback from training personnel from across the industry
- Recommended focus on CHPP's
- SB 18-19 – Isolation issues identified at coal mines
- The number of incidents that were occurring across the industry
- The role of supervision in preventing incident occurrences



Recommended focus on CHPP's

The audit topics

- Review of training, assessment, re-training and re-assessment for Isolation/Hazardous Energy Control
- Training Needs Analysis (TNA) and/or Training Plan for CHPP supervisors; and
- Training, assessment, retraining and re-assessment for CHPP supervisors

Routine audit follow-up



General findings

- A majority of sites maintained the “stamped and approved” TCMS as the controlled document within the Document Control System.
- Many sites had **not completed** an “internal audit” of the TCMS
 - Rely on company regulatory compliance audits, SAWOL audits etc.
 - The Order 34 team have developed a tool for this purpose.
- Many of the sites had contemplated but not yet implemented the improvement opportunities from the 2019 Order 34 audits
 - If not implemented, could pose a risk to the operations

Isolation of energy:

What a good system looks like

- Documented management plans and procedures
- Basic training and assessment at induction/onboarding
- Detailed training and assessment prior to commencing work
- Quality theory assessment (not True/False, Yes/No for everything)
- Practical assessment/demonstration to be included
- Regular refresher based on risk
- Anything else?

Isolation of energy

What we found

- Significant variation in the complexity and detail
- Variations in the practical application of isolation procedures
- Wide variety of lock colours (and purposes) across the sites
- Majority of the sites included “basic” isolation training during the induction process.
- For the sites with “complex” isolation system, the possibility of mistakes, errors or omissions arise
 - high potential incidents with possibly catastrophic consequences.



Isolation of energy

What we found

- Assessment of competence for “basic” isolation is by a theory/knowledge assessment involving True/False, Yes/No , or fill in the missing word.

Does this assess “competence”?

- Assessment/re-assessment of competence **did not always** include a “practical” exercise
- The re-assessment frequency established at three (3) year intervals.
 - Little regard to an increased frequency for high risk isolations e.g. hi voltage isolation
 - Some sites had not re-assessed competency for Isolation Supervisors for many years

Supervisor training



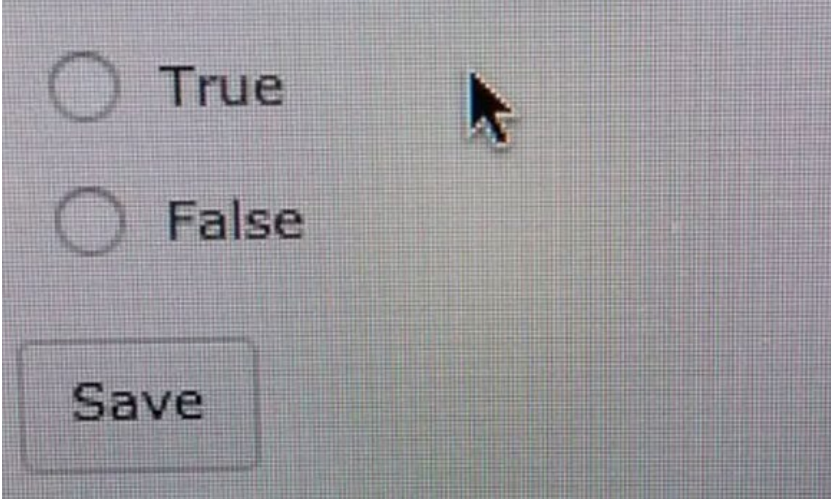
What a good system looks like

- Documented position description (list of essential and desirable qualifications and experience for each position e.g. CHPP Manager, Supervisor, Operator)
- TNA based upon the above
- Training plan based on two items above
- Regular refresher training and assessment based on risk
- Anything else?

Supervisor TNA and training

What we found

- Most sites had a TNA for Supervisors.
- Significant differences between the TNA (or Training Plan) and training records.
- Assessments of Supervisor understanding of their roles and responsibilities arising from elements of the SMS was generally poor.
- Some sites require the Supervisor to read and sign, others assessing competence by True/False, Yes/No, or fill in the missing word type assessment tools.
- ANTS training was poor, but covered by internal company-based programs.



A screenshot of a digital assessment form. It features two radio button options: "True" and "False". A mouse cursor is positioned over the "True" option. Below the radio buttons is a rectangular button labeled "Save".

General comments



- Majority of sites participated positively
- Remote audit checklist helped identify improvement opportunities
- It is a personal concern when Isolation of Energy is crammed into Induction and there is an expectation that people will comply with the procedure when their understanding of the process is somewhat questionable
- Assessment of competence **cannot** be measured by True/False, Yes/No type questions
- The establishment of an industry isolation standard is a dream for the future – it's in your hands (at least a consistent lock colour code)
- Isolation incidents are still occurring



Coal Services

