

1. SCOPE

This document details the policy and procedure to be applied in auditing **Senior Authorised Persons** and **Authorised Persons** to ensure full compliance with the application of the ScottishPower Safety Rules (Electrical and Mechanical) and support documentation.

Auditing of **HV Rubber Glove Working** teams will be completed in accordance with OPSAF-11-007 (MSP 1.5).


2. ISSUE RECORD

This is a **Reference** document. The current version is held on the EN Document Library.

It is your responsibility to ensure you work to the current version.

Issue Date	Issue No	Author	Amendment Details
December 2010	9	P J Currie	Update Logo and review, reference MSP. Minor editorial changes and delete appendices.
February 2012	10	Dave Naylor	Update to Sections 8.3 (iii) and 8.8.
18/01/2017	11	Dave Naylor	Audit frequencies extended to four years. Minor editorial changes.

3. ISSUE AUTHORITY

Author	Owner	Issue Authority
Name: Dave Naylor Title: Operational Safety Engineer	Name: Gary Evans Title: Operational Assurance Manager	Name: Wilma Kelly Title: Health & Safety Director  Date: 6/2/17.....

4. REVIEW

This is a **Reference** document which has a 5 year retention period after which a reminder will be issued to review and extend retention or archive. The proposed revision date can be viewed in the Management Safety Procedures Document Index DOC-00-238.

DISTRIBUTION

This document is part of the Management Safety Procedures Manual but does not have a maintained distribution list.

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6. DEFINITIONS

Terms printed in bold type are as defined in the ScottishPower Safety Rules (Electrical and Mechanical) 4th Edition.

Terms printed in italics are defined in the Definitions document (OPSAF-11-002) of the Management Safety Procedures.

7. GENERAL

- 7.1 Safety of **Persons** when working on the **System** is ensured by compliance with the ScottishPower Safety Rules (Electrical and Mechanical) and support documentation.
- 7.2 To ensure that ScottishPower's legal obligations in this respect are carried out and that **Persons** are complying with the Safety Rules and support documentation, Operational Compliance Auditing shall be carried out as detailed in this procedure.
- 7.3 Operational Compliance Audits will consist of three parts:
- (i) On-site audits
 - (ii) **Safety Document** audits
 - (iii) **Control Person** audits
- 7.4 While **General Safety** is not directly associated with the **System**, this shall be established and maintained during the course of the work. If **General Safety** is not established and maintained to an acceptable standard this may have an adverse effect on **Safety from the System**. Maintenance of **General Safety** shall, therefore, be included in Operational Compliance Auditing. The arrangements for the establishment and maintenance of **General Safety** are covered by OPSAF-11-012 (MSP 2.1).

8. POLICY

8.1 Operational Compliance Audit – Responsibilities

The responsibility for Operational Compliance of Energy Networks staff rests with the Operational Assurance Manager.

The responsibility for Operational Compliance Auditing of non-Energy Networks staff rests with the employing company of the staff authorised. The Operational Assurance Manager will conduct his own sample on-site audits on a selection of non-Energy Networks staff.

8.2 Operational Compliance Audit – Auditor

Operational Compliance Auditing shall be carried out by **Person(s)** with the appropriate knowledge and experience and nominated by the Operational Assurance Manager.

8.3 Operational Compliance Audit – Persons to be Audited

All **Persons** authorised for the following will be the subject of an Operational Compliance Audit.

- (i) Authorised for the issue and/or receipt of **Safety Documents** (On-site audit).
- (ii) Authorised to undertake **Live** work procedures (On-site audit).
- (iii) Authorised for **Switching** (On-site audit). NB this excludes **Control Persons** authorised only for **Switching** by remote control - see iv) below.

- (iv) Authorised to act as **Control Person** holding authorisations CP-1 or CP-2 (**Control Person** audit).
- (v) Staff holding authorisation for *Field Control*, CP-3 or CP-4, will also hold authorisation for issue of **Safety Documents**. An “On-site” audit will be conducted on these staff rather than a “**Control Person**” audit.

In addition, “Risk Based” audits will be carried out as determined by the Operational Assurance Manager. These audits shall be targeted at activities and/or staff groups most at risk to operational incidents.

8.4 Operational Compliance Audits – On-Site Audits

On-site audits shall be completed in the following manner by:

Unannounced visits (where reasonably practicable) to sites where work involving the application of the Safety Rules and support documentation is in progress. The audit shall take into consideration all work in progress at the time of the audit and shall include auditing of **Safety Documents**, **Switching** schedules, **Switching** and Fault Logs and any other written instructions/drawings issued.

8.5 Operational Compliance Audits – Control Person

These audits will be conducted on staff holding authorisations CP-1 or CP-2.

Control Person audits shall be completed in the following manner by:

Unannounced visits to Control Centres, which coincide with low **System** activity. The Auditor shall take into consideration the work in progress, recently completed jobs and shall include audits of **Safety Document** issue, **Switching** schedules, Suspension of Operational Practices and authorisation levels.

8.6 Operational Compliance Audit – Frequency of Audits

The target period between programmed audits shall be 48 months. Where reasonably practicable all staff requiring an audit, as specified in section 8.3 above, shall be audited at least once within a 54 month period.

8.7 Operational Compliance Audit – Safety Document Audit

In any 48 month audit period a minimum of 10 **Safety Documents** or all **Safety Documents** issued, whichever is the least, shall be audited.

8.8 Operational Compliance Audits Which Cannot Be Carried Out Using Normal Arrangements

Operational Compliance Audits under normal arrangements may not be possible for staff who are either:

- (i) non-operational during the normal working day and may only undertake standby duties out of hours, or
- (ii) non-operational except for **System** emergencies.

Special arrangements will be required to enable Operational Compliance Audits to be completed for these staff at either one of the ScottishPower training centres or on a pre-arranged job.

Staff who do not, when requested, submit themselves for Operational Compliance Auditing in this way shall have their OP, WL, SI, SR and CP authorisations revoked. They will then be required to attend refresher training and assessment to regain their authorisation.

9. PROCEDURE

9.1 On-Site Operational Compliance Audits (Energy Networks Staff)

9.1.1 A register recording the Energy Networks **Persons** to be audited shall be stored in the Health and Safety database.

The register shall be compiled and updated annually from the data held in the Authorisation database.

9.1.2 Operational Compliance Audits shall be carried out by unannounced visits where reasonably practicable.

9.1.3 Audits shall be timed so that work and/or **Switching** are monitored.

9.1.4 Auditing shall be based on the 'Operational Site Audit' checklist that is contained in the Health and Safety database.

9.1.5 The Auditor shall point out and record any non-compliance with the Safety Rules and other deficiencies to the personnel concerned on site during the course of the audit.

9.1.6 If any non-compliance with the Safety Rules or other deficiencies are such that it is necessary to stop work the responsible Manager shall be contacted immediately.

9.1.7 For each audit, a report shall be prepared in the appropriate sections of the 'Operational Site Audit' checklist. Results of audits and actions required shall be recorded in the Health and Safety database and be available to managers for viewing and to auditors at future audits. Significant non-compliance will be notified to managers with required remedial action specified.

9.2 Safety Document Auditing (Energy Networks Staff)

9.2.1 A Register recording the **Persons** to be audited shall be stored on the Health and Safety database.

The Register shall be compiled and updated annually from the data held in the Authorisation database.

9.2.2 Auditing of completed and returned **Safety Documents** shall be based on the '**Safety Document** audit' checklist contained in the Health and Safety database. Cancelled **Safety Documents** shall be retained in accordance with requirements of OPSAF-11-031 (MSP 4.6).

9.2.3 For each audit, feedback from the Auditor will be given to the **Senior Authorised Person** on the quality and accuracy of his/her **Safety Documents**. Results of audits and actions required shall be recorded in the Health and Safety database and be available to managers for viewing and to auditors at future audits. Significant non-compliance will be notified to managers with required remedial action specified.

9.3 Control Person Audits

9.3.1 A Register recording the **Persons** to be audited shall be made available via the Health and Safety database to the Operational Assurance Manager.

The Register shall be compiled and updated annually from the data held in the Authorisation database.

9.3.2 **Control Person** audits will be carried out by unannounced visits where practicable.

9.3.3 Audits shall be timed to coincide with periods of low **System** activity.

9.3.4 Audits shall be based on the checklist that is contained in the '**Control Person** audit' checklist contained in the Health and Safety database.

9.3.5 During the course of the audit the Auditor shall point out to the **Control Person**, and shall also record, any non-compliance with the Safety Rules and support documentation, and any other deficiencies.

9.3.6 If any non-compliance with the Safety Rules or other deficiencies are such that it is necessary to stop work the responsible Manager shall be contacted immediately.

9.3.7 For each audit, feedback from the Auditor will be given to the **Control Person**. Results of audits and actions required shall be recorded in the Health and Safety database and be available to managers for viewing and to auditors at future audits. Significant non-compliance will be notified to managers with required remedial action specified.

10. RECORDING OF OPERATIONAL COMPLIANCE AUDITS AND RETENTION OF RECORDS

For both Energy Networks' Staff and Contractors, the results of the audits shall be recorded on the Health and Safety database.

11. COMPLIANCE REPORT

A Compliance Report, produced from information held in the Health and Safety database, shall be completed on a monthly basis to monitor the progress of audits against target and to monitor the progress of any resulting actions. Deficiencies will be highlighted in the report and assigned to the responsible Manager for action.