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| Process Safety Management Program |
| **Title:** Compliance Guidelines for Employee Participation  **Document #:** PSM-SY-UN-012 **Issued:** 08/01/14 |
| **Responsible Dept.:** EHS **Version:** New  **Approved By:** PSM Focus Group **Page:** 1 of 2 |

**1.0 Purpose:** This document summarizes the method The Pennsylvania State University uses to comply with the requirements relating to the Employee Participation Element of the Process Safety Management (PSM) Program.

**2.0 Scope:** The intent of this element is to provide a structure for a cooperative participatory environment and to ensure the necessary flow of information from senior leadership to employees and employees to senior leadership on process safety issues. Senior leadership is required to consult with their employees and their representatives (where they exist) in an attempt to elicit and respond to employee concerns and suggestions affecting process safety activities. This two-way dialogue, between management and the workforce, on process safety issues in the workplace is required as one of the components of a continuous process safety improvement program. The element is not intended to delegate process safety responsibilities to employees, but rather to take advantage of their knowledge, experience and unique perspectives when considering process safety matters.

**3.0 Guidelines:** Under the Penn State PSM program, employees are encouraged to actively participate in all elements of the program. In addition, many of the PSM program elements have included a specific requirement within the Compliance Guidelines for employee involvement on hazard assessment/review teams, incident investigation teams and other areas that employee involvement is critical.

Specific examples of employee participation include:

1. Employees will participate in developing the Process Safety Management Program for the University or subsequent program modifications
2. Employees will participate in developing and conducting Process Hazard Analysis (PHA) on the various covered process areas
3. Employees will participate on Incident Investigation teams
4. Employees will provide input on various process operating or maintenance procedures, or in certain cases develop and write the procedures
5. Teams evaluating proposed process changes under the Management of Change (MOC) element will include employees from all levels of the organization
6. Consult with employees on PSM training programs. This can include the need to conduct refresher training, on an existing covered process, more frequently than once every three (3) years as outlined in the Training and Assessment element

In addition to these formal employee participation avenues, appropriate options to communicate process safety concerns or issues identified by employees must exist within the University. The methods to raise process safety concerns must be communicated to employees and supported by senior leadership. At a minimum, employees can communicate any process safety issues to their supervisor, Safety Officer or the Process Safety Program Manager (PSPM). These issues shall be provided in writing.

The University will also consult with Contractors on process safety issues and to solicit their input on the effectiveness of the Contractor Management Element (#10) periodically. In addition, Contractor participation on applicable Incident Investigation Teams and evaluating appropriate proposed changes under the Management of Change element will be required where appropriate.

Employee participation within the various aspects of the University’s PSM program will be documented accordingly. This can include but not limited, to meeting minutes, investigation team documentation, email correspondence or training documentation.

**4.0 Definitions:** The following definitions provide guidance regarding common issues surrounding the Employee Participation Element.

*Employee Consultation –* establishing a dialogue for the exchange of views or soliciting input between employees and the University.

*Employee Participation -* the process whereby employees are involved in decision making processes, ability to raise issues/concerns and are actively engaged in a two-way dialogue regarding process safety management matters, rather than simply acting on orders

Note: The Employee Participation Element is intended to include both participation and consultation.

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| Process Safety Management Program |
| **Title:** Employee Participation Procedure  **Document #:** PSM-SOP-UN-009 **Issued:** 10/03/2014 |
| **Responsible Dept.:** EHS **Version:** New  **Approved By:** PSM Focus Group **Page:** 1 of 5 |

**1.0 Purpose:** This document is intended to guide employees of The Pennsylvania State University (Penn State) in the requirements of Employee Participation within the Process Safety Management (PSM) Program. This procedure provides a structure for a cooperative participatory environment and to ensure the necessary flow of information from senior leadership to employees and from employees to senior leadership on process safety matters.

**2.0 Scope:** For the PSM program to be successful, active employee involvement and participation must be a component. Employee participation is intended to leverage their knowledge, experience and unique perspectives when evaluating process safety matters. This element identifies the various mechanisms available for employees to participate in the PSM program and defines the minimum requirements relating to employee engagement.

**3.0 Responsibility:** The following list of employees has specific responsibilities assigned to them in accordance with the requirements of Employee Participation within the PSM Program. Specific Budget Executives and Budget Administrators may assign these responsibilities to a Department or individual other than the one identified in this procedure as appropriate.

Budget Executives and Budget Administrators:

1. Primary responsibility to maintain a safe work environment within their jurisdiction, by monitoring and exercising control over their assigned areas.
2. Assign a representative from each academic and administrative unit to ensure compliance with this procedure.
3. Ensure appropriate mechanisms exist for employee participation within the academic departments or administrative units for which they are responsible.

Director Design & Construction:

1. Ensure employees within their area(s) of responsibility are aware and understand employee participation requirements outlined in this procedure.
2. Provide appropriate opportunities for employees to actively participate in the PSM program.

Building Operations / Utility Engineers:

1. Participate on PHA’s, Incident Investigation teams, Pre-Startup Safety Reviews, and Management of Change assessments.

Supervisor, Area Services:

1. Ensure employees within their area(s) of responsibility are aware and understand employee participation requirements outlined in this procedure.
2. Provide appropriate opportunities for employees to actively participate in the PSM program.
3. Participate on PHA’s, Incident Investigation teams, Pre-Startup Safety Reviews, and Management of Change assessments.
4. Take prompt corrective action when unsafe process safety conditions or practices are observed or reported.

Operations/Facility Manager:

1. Ensure employees within their area(s) of responsibility are aware and understand employee participation requirements outlined in this procedure.
2. Provide appropriate opportunities for employees to actively participate in the PSM program.
3. Participate on PHA’s, Incident Investigation teams, Pre-Startup Safety Reviews, and Management of Change assessments as appropriate.
4. Take prompt corrective action when unsafe process safety conditions or practices are observed or reported.

Safety Officer:

1. Coordinate implementation of the Employee Participation element within the work unit.
2. Ensure required training is provided to employees within the work unit.
3. Participate on PHA’s, Incident Investigation teams, Pre-Startup Safety Reviews, and Management of Change assessments as appropriate.
4. Take prompt corrective action when unsafe process safety conditions or practices are observed or reported.

Process Safety Program Manager – EHS Department:

1. Oversee all aspects of the University’s Process Safety Employee Participation program.
2. Periodically review department records associated with employee participation.
3. Provide appropriate opportunities for employees to actively participate in PSM program development, modification and training sessions.
4. Track and report metrics established for this element to affected groups and senior leadership as appropriate.

Employees:

1. Actively participate in the various PSM program elements.
2. Report Process Safety issues to appropriate line management and/or Process Safety Program Manager that may help eliminate or mitigate the consequences of a catastrophic release in a covered process area.

**4.0 Definitions:**

*Covered Process* - any process where a highly hazardous chemical / biological agent or extremely hazardous substance deemed by Penn State is used, handled or stored. This also includes critical process operations identified by the University that would benefit from PSM program implementation.

*Employee Consultation –* establishing a dialogue for the exchange of views or soliciting input between employees and the University.

*Employee Participation -* the process whereby employees are collaboratively engaged in decision making processes, are able to raise issues/concerns and are actively participating in a two-way dialogue regarding process safety management matters in an effort toward continuous improvement.

*Incident Investigation Team* – A group of qualified people that examine an incident in a manner that is timely, objective, systematic, and technically sound to determine the factual information pertaining to the event, ensure probable cause(s) are ascertained, and complete technical understanding of such an event is achieved and documented.

*Process Hazard Analysis (PHA) -* is an analytical tool that is used to identify the inherent causes and subsequent consequences of potential accidents or hazard scenarios that involve fires; explosions; releases of toxic, reactive or flammable chemicals/biological agents; and major spills of hazardous chemicals/biological agents and to recommend corrective measures to prevent such occurrences.

*Pre-Startup Safety Review (PSSR)* – a technical review and inspection of equipment modification prior to startup to ensure that the modification has been installed in accordance with the approved design standards, that procedures are in place and adequate, and that training of affected personnel has been completed.

**5.0 Procedure:** Penn State recognizes that employee involvement and participation in the University’s EHS programs, including Process Safety Management is critical for driving a safe University culture. This commitment is demonstrated through various policies and programs (e.g. Philosophy of Safety, OPP Safety Mission Statement, Integrated Safety Plan, etc.), but it also must be clearly visible within day-to-day activities. The following steps outline the requirements relating to employee participation within the PSM program.

1. The fundamental objective of this element is to have employees actively engaged in various phases of the departmental process safety efforts. The intent is not to delegate process safety responsibilities to employees, but rather to take advantage of their unique insights when evaluating process safety issues.
2. Establishing clear lines of communication on process safety issues is an important method of learning about potential hazards within a covered process area. It also provides an effective mechanism for involving employees by encouraging them to bring forth process safety concerns or suggestions. Therefore, it is important to make certain that employees know who they should contact regarding process safety input. This normally would be their immediate supervisor or manager.
3. Employees should also be aware of other resources available to them such as the college or unit safety officer, the department safety committee and the EHS department. Employees wishing to remain anonymous when reporting can submit their concerns or suggestions through their department Suggestion Box (if one exists) or the main EHS webpage.
4. Any employees working in an area designated as a Covered Process Area within the PSM program will be made aware of the mechanisms to communicate PSM issues. This will occur when the work unit is identified as a covered process under the PSM program. In addition, any new employees (newly hired or transfers) in the covered process area will be provided the information within 30 working days.
5. Certain PSM program elements outline specific employee involvement, however, at a minimum it will include:
   1. Employee participation in initial PSM Program development and subsequent program modifications
   2. Employee participation in Process Hazard Analysis (PHA) on covered process areas
   3. Employee participation on Incident Investigation teams
   4. Employees will provide input and review appropriate process operating or maintenance procedures and where appropriate, develop and write the procedures
   5. Employee participation on Management of Change evaluations
   6. Employee participation on Pre-Startup Safety Reviews
   7. Obtain employee input when developing process safety training materials, including training frequency
6. In addition to the activities identified above, employees are empowered to formally evaluate contractor activities while working in or around a covered process area. Requirements associated with this type of employee participation are outlined within the Contractor Management Element (#10).
7. The Process Safety Program Manager (PSPM) is required to periodically evaluate performance to program elements within the various covered process areas and overall PSM management system. Where appropriate, the PSPM will involve employees in these internal program assessments.
8. Employee participation within the PSM program will be appropriately documented by the department. Documentation can include but is not limited to meeting minutes, investigation team lists (Incident Report Form), Pre-Startup Safety Review team lists (PSSR Form), Management of Change authorization (MOC Form), PHA team lists (PHA Report Form), Inter-Office Memorandums, email correspondence or training Sign-In sheets.
9. In addition to actively engaging employees in their participation of various aspects of the University’s PSM program, employee consultation is also included within the requirements of this element. Consultation is typically requested through written surveys or specific selection from various options (e.g. selection of PPE, etc.). Consultation activities within the PSM program will be appropriately documented as well by the department.
10. The University will also consult with contractors on process safety issues and solicit their input on the effectiveness of the Contractor Management Element. Contractor input will periodically be sought during their re-qualification process.
11. Specific contractor participation on applicable Incident Investigation Teams will be required as appropriate. If a contract employee is involved in a Process Safety Incident or Near Miss while working on or around a covered process area, a representative from the contractor will participate on the investigation team.
12. Specific contractor participation in evaluating proposed modifications under the Management of Change (MOC) element will be required as appropriate. If a contractor is engaged as part of the MOC and contains specific experience and/or knowledge relating to the proposed modifications, a representative from the contractor will participate in the MOC.
13. The PSPM will periodically evaluate performance within the requirements of this element and provide input to the affected departments.

**6.0 Attachments**

* 1. N/A