# PSM is about people, plant and systems, and what they do in real life

Good governance of process safety requires a clear strategy, robust policies and procedures, and allocation of appropriate resources. But that alone is not enough. It also requires a positive culture, embodied by the right mix of individual and group values, attitudes, competencies, and behaviours to remain confident that things will get done as expected when no one is watching.

Every organised group of individuals develops a culture, but a good culture makes people feel safe and respected, enabling them to perform at their best.[1] Without this those involved in process safety management (PSM) will just be a collection of individuals guided by their own values, knowledge, and experience.

A good process safety leader should determine policy, set standards and expectations, and encourage engagement throughout. An effective safety management system (SMS) will provide structure and serve to reinforce the overall safety culture.

All establishments falling under the COMAH Regulations[2] must prepare a Major Accident Prevent Policy (MAPP) setting out the measures in place for managing major accident hazards.

For lower tier sites the MAPP will be a relatively simple standalone document covering what is to be achieved, referencing essential elements of the underpinning SMS. The MAPP is concerned with people, plant and systems, and what they do in real life[3] and must demonstrate a commitment to continuous improvement in all aspects.[4]

For upper tier sites the MAPP must be included as a separate document in the COMAH safety report. In turn, the safety report should detail risks due to credible major accident scenarios on site for personnel, nearby populations, and the environment, and should demonstrate that the MAPP and the SMS for implementing it have been put into effect in accordance with the information set out in Schedule 2 of the Regulations. In essence, the safety report is a snapshot in time, providing stakeholders with a degree of confidence that the systems in place for managing major accident hazards are effective. Further, under Regulation 10, any changes to the SMS that could have significant consequences for the prevention of major accidents or the limitation of the consequences of major accidents to human health and the environment will call for review and, where appropriate, revision of the safety report.

But regardless of planned changes, management systems can degrade with time. Recognising this, Schedule 2 of the Regulations places a requirement on every COMAH operator to adopt and implement procedures "... for periodic systematic assessment of the major accident prevention policy and the effectiveness and suitability of the safety management system."

Audits are an essential part of any management system and should be carried out as part of normal day to day business. Auditing should be a structured process of collecting information on the efficiency, effectiveness, and reliability of the whole SMS.

In accordance with L111 [4], the audit plan should include details of the:
- areas and activities to be audited
- frequency of audits for each area concerned
- roles and responsibilities
- resources and personnel required for each audit
- audit protocols to be used
- procedures for reporting audit findings
- follow-up procedures, including corrective action management

Different parts of the SMS may be subject to different audit frequencies, based for example on policy, risks or the maturity of the SMS, but the programme must cover the entire SMS and operational areas over time. A well-designed audit programme should also promote workforce engagement, making best use of available resources, and drive improvement towards defined standards and goals. Reports should also help stakeholders to understand the current state of the SMS – the way things are versus defined standards – and what needs to be done to realise the desired future state based on what is reasonably achievable and acceptable to all concerned.

*OpenPSM has been designed to help operators manage their SMS audits easily and simply in-house. For more information, go to www.openpsm.uk.*

[1] Lead From the Top: 5 Core Responsibilities of a CEO | Entrepreneur
[2] The Control of Major Accident Hazards Regulations 2015 (legislation.gov.uk)
[3] Understanding-comah-new-entrants.pdf (hse.gov.uk)
[4] The Control of Major Accident Hazards Regulations 2015. Guidance on Regulations L111 (hse.gov.uk)