



**Procedure on Life Protection Rules – Zero Tolerance**

**Mark Air Conditioning System**

## **1. Introduction**

We have implemented several measures for strengthening the Safety Management System at Mark. This includes framing of procedures and compliance with the group standards; training of personnel on procedures, providing resources and several proactive measures to enhance level of safety.

Incident analysis at Group level indicated that majority of incidents are either involving Line break activities, Confined Space entry or due to lack of implementation of stated controls in issued work permit. Considering all, Centre for HSE Excellence (CHSEE) has released standard on 'Life Protection Rules' –Zero Tolerance (hereafter mentioned as LPR ZT).

This procedure describes implementation of this standard

It is intended that by widely communicating requirements of this procedures and adherence to site safety rules and procedures, need for applying provisions of LPR-ZT shall not arise. However, this procedure describes, how LPR –ZT rules will be applied in case of any violation to LPR-ZT is observed.

## **2. Intent and purpose**

The intent of this procedure is to '**Protect Personnel**' working at site. It is applicable for every person working at site irrespective of his/her status. It requires whole hearted efforts from all employees and contractors for its compliance.

This procedure does not supersede Progressive Disciplinary Action procedure but compliments that.

## **3. Scope**

The scope of 'Life Protection Rules- ZT' as laid down in this document is applicable to the everyone working at Mark. Therefore, all employees and contractors working inside steady state area of Refinery complex is required to strictly abide by the provisions made in this procedure,

This procedure is applicable under all circumstances e.g. Even during ReSOP round LPR ZT violation is observed this procedure is to be followed.

## Procedure on Life Protection Rules - Zero Tolerance

Refer below mentioned details on applicability of this procedure considering the areas of Mark work sites

<b>Life Protection Rule</b>	<b>Applicability</b>
No drugs or alcohol, No smoking	Inside Complex Premises
Non-use of mobile phones in hazardous area	In Areas where mobile phone use is prohibited
No Violation of Work Permit conditions	Inside Process as well as in Non-Process areas where Work Permit System is applicable
No Line Break without authorization	Inside Process as well as in Non-Process areas where Work Permit System is applicable
No Confined Space entry without authorization	Inside Process as well as in Non-Process areas where Work Permit System is applicable

#### **4. Life Protection Rules - Zero Tolerance**

'Zero Tolerance' is defined as the policy of not allowing any violation which can put the life of the person in danger.

**Life Protection Rules of Zero Tolerance:**

Following are the four rules through which JMD site intends to build Safety Culture of Zero tolerance across the site.

- 1. No drugs or alcohol, No smoking, No use of mobile phones in hazardous area.**
- 2. No Violation of Work Permit Conditions**
- 3. No line break without authorization**
- 4. No Confined space entry without authorization.**

**4.1**

**No drugs or alcohol, No smoking, No use of mobile phones in hazardous area:**

Using alcohol illegal drugs, or misusing legal drugs or other substances, reduce the ability of the person to do the job safely. Smoking or use of matches or cigarette lighters could ignite flammable materials. Therefore, nobody is allowed to smoke or use drugs or alcohol and keep ignition sources such as lighters, matches, or mobile phones even in switched off condition in their possession inside the ISBL plant, except in the area permitted.



Below mentioned conditions and behaviors are prohibited and shall apply LPR ZT process on violation inside Complex

- Using, possessing, selling or distributing illegal drugs.
- Remaining under influence of alcohol or drugs during duty hours. This includes remaining under influence of medical drugs which may hamper the performance at work.
- Smoking inside Refinery premises
- Carrying or Using mobile phone in restricted area (other than intrinsically safe mobiles authorized to key personnel). Use of mobile phone in safety critical jobs may also result in distraction leading to an incident.

#### **4.2 No Violation of Work Permit Conditions:**

An approved work permit is required for all work to be performed except jobs which are exempted from Work Permit Procedure. The permit to work recognizes the risks posed by the relevant task to be performed and puts in place appropriate controls for the safe conduct of the work right from the planning of the task



Below mentioned conditions and behaviors are prohibited and shall apply LPR ZT process on violation inside Complex

- Working without a valid permit
- Working without Lifesaving Personal Protective Equipment such as Online BA sets or SCBA sets
- Permitting work without gas test, when required.
- Working at height without securing safety harness
- Permitting work without ensuring proper isolation (Process, Mechanical or Electrical).
- Walking on pipeline at pipe rack (1st tier or above) without using proper fall protection
- Performing Heavy Lift without Lifting Plan.

#### **4.3 No line breaks without authorization:**

Consider all process lines as full of hazardous material and energy until it is proved that they are sufficiently isolated, depressurized, drained, purged for decontamination.



Below mentioned conditions and behaviors are prohibited and shall apply LPR ZT process on violation

- Performing Line Break without valid authorization and risk assessment.
- Line break is performed without isolation, depressurization, draining and purging, where line is likely to remain under pressure or contaminated due to passing or non-provision of isolation valves.

- Lifesaving Personal Protective Equipment either not identified in permit or not used during job (e.g. Online/SCBA Sets, PVC suits while acid handling, IFR / Alumina suits)

#### **4.4 Entering a Confined Space without authorization:**

Confined spaces in plants have potential hazards of Ignition, Oxygen deficiency, Toxic gas exposure. Entering in to such confined spaces require proper planning for isolation, depressurization, draining and purging them with suitable media. Confirmation of atmospheric conditions through gas test is essential for ensuring safe conditions inside Confined space before man entry.



Below mentioned are the conditions/ behaviors which are expected as a mandatory requirements and failure of which shall apply LPR ZT process

- Entering confined space without authorization
- Attendant of the confined space is not available when person is already working inside the Confined Space.
- Process, Mechanical, Electrical, and Radiations Isolations not performed before permitting Confined Space entry.
- Gas tests not performed for toxic, flammable and oxygen presence during permit first entry and subsequently at predefined frequencies.

#### **5. Communication of LPR – ZT Rules**

It is very essential to communicate these LPR – ZT rules clearly to all employees, contractor employees, suppliers, and vendors etc. as part of General Contract Conditions (GCC). The LPR – ZT module shall be one of the mandatory modules of communication for existing employees (HSE Cluster training) as well as new joiner's validation program.

**6. Classification of LPR – ZT Violations and Level of actions**

All LPR ZT classifications shall be based on ‘What could have happened’ (Potential consequences) rather than ‘What has actually happened’. It is every individual’s responsibility to abide at all times by the above Life protection rules- ZT. Any violation observed shall be classified with respect to potential consequences as well as type of violation. In case of violation, following Consequence Matrix shall be used for classification of disciplinary action.

**Consequence Matrix**

<b>Potential Consequences</b> → <b>Type of violation</b> ↓	MTC	RWC	LWC	Fatality/ Multiple Fatality
Unintentional/ Situational/ Exceptional	C	C	VCC	WCC
Routine	C	VCC	WCC	S
Negligence/Shortcut	VCC	WCC	S	T
Sabotage	T	T	T	T

<b>Level of Action in Matrix</b>	<b>Action for Employees (Thru’ HR dept.)</b>	<b>Action for Contractor Employees, Vendors, Experts (Thro’ Contract Cell)</b>
C	Counseling	Counseling
VCC	Verbal Correction Contact	Suspension for 3 days from duty
WCC	Written Correction Contact	Suspension for 7 days from duty
S	Suspension from the work (Short duration)	Suspension for 30 days from duty
T	Termination from services	Termination of access

Potential Consequences mentioned in the above matrix are self-explanatory and does not need further explanation. Sabotage in any form shall be treated as Intolerable. Repeat violation by individuals will lead to next higher level of disciplinary action.

*(In case of lack of clarity or doubt in deciding the level of actions the decision from Site LPR – ZT committee with approval from Site President shall be final and abiding to all)*

### **Explanation on Type of Violations**

- **Unintentional, Situational, Exceptional:** Violation due to lack of clarity in communication or unintentional violation due to situational difficulties or adversities.

**Example: -**

No anchorage provided for anchoring safety harness while working at height. Due to some unintended action, violation has occurred it may not be solely employee's fault.

- **Routine:** Violation has become the normal way of doing things, everybody is doing it and it is usually known by supervisors who ignore it by not acting on to it stop/prevent recurrence.

**Example: -**

Non-use of seatbelt by forklift drivers during material handling or bypassing reverse movement indicator flash lights.

Doing high risk conflicting activities

- **Negligence/Shortcut:** Taking the shortcuts or narrowing the timelines in completing tasks at the cost of steps/ timelines mentioned in procedures

**Example: -**

Reducing the purging time (lesser than the one mentioned in SOP) resulting into adverse condition in vessel during confined space entry.

- **Sabotage:-** Violation with intention to bypass procedure even after having awareness on procedural requirements

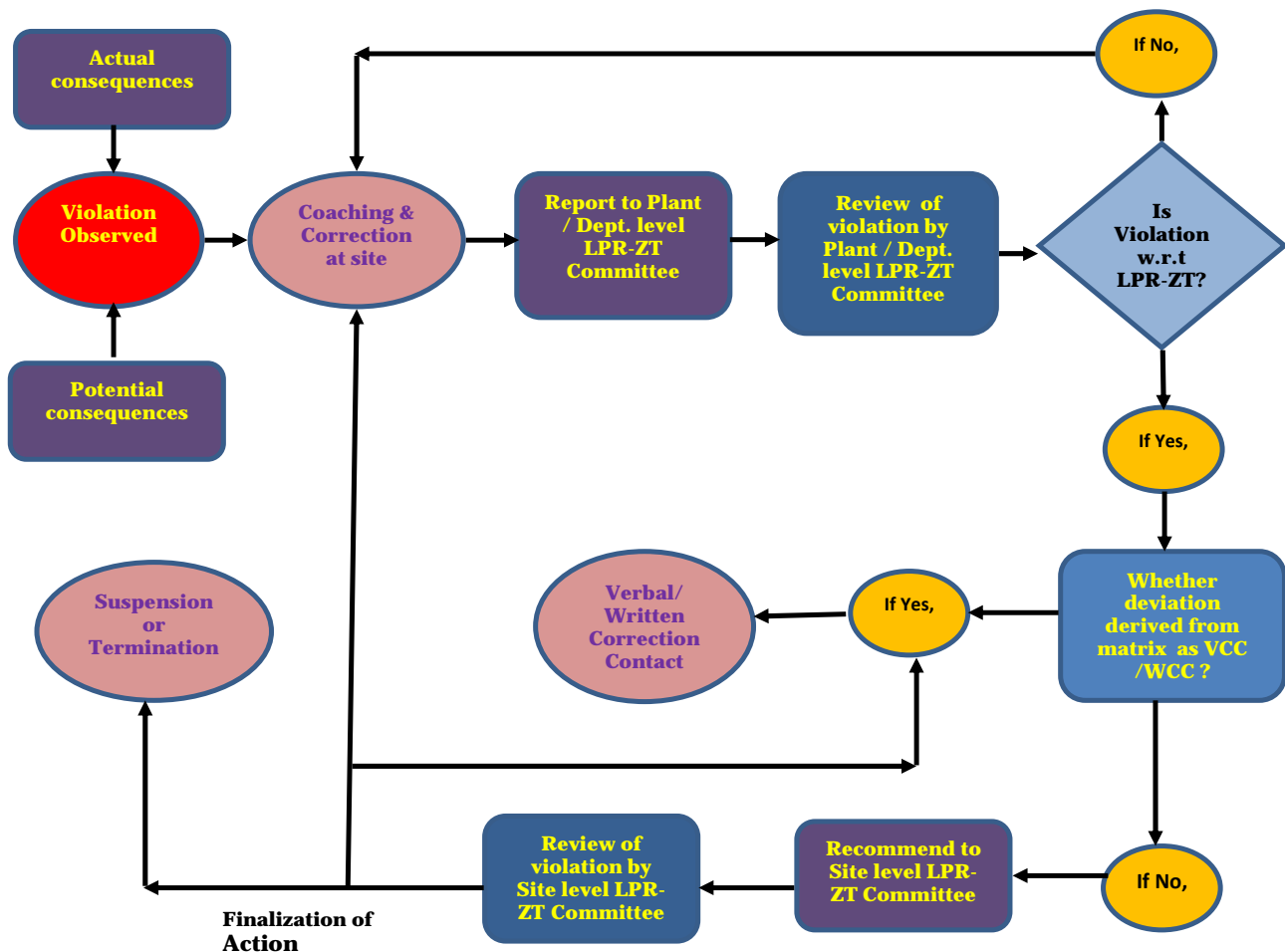
**Example: -**

Allowing personnel entry in confined space without confirming Oxygen content, Hydrocarbon, Toxics etc.

Unauthorized override of safety critical equipment such as Pressure Safety Valve or a Process Relief Device.



## 7. LPR – ZT Violations Review & Concluding Level of Actions



### Explanation of Steps

1. A violation observed shall be reported by person who observes violation called intervener.
2. Intervener will positively try to coach and correct the person involved in violation. This shall be ensured before reporting.
3. Intervener shall have a dialogue with person involved in violation, to understand the causal factors and verify
  - 1) If the person is aware of the LPR ZT rules?
  - 2) Is there a situational factor or pre condition that provoked violation?
  - 3) Was he/she been instructed to bypass procedural steps?
  - 4) Any past behavior of the person or his habits on similar violations
4. Once clear about above facts, Intervener will report the violation to Plant/Dept. level LPR ZT committee using format attached as Annexure I

**Plant/Dept. level LPR ZT committee constitution** is as follows shall have

- 1) HOD Plant /Dept. (Leader),
- 2) Maintenance Manager (Where applicable),
- 3) HR Coordinator,
- 4) Safety Manager,
- 5) Contract cell officer (Where violation involves contractor employee).

Plant / Dept. Level committee will review the violation, have an unbiased view will assess if subject violation is LPR ZT violation or not?

If it is not found a LPR ZT violation, but any other procedure violation then the person involved in violation shall be counseled.

If the violation involves LPR ZT violation, Plant /Dept. Level committee will review and investigate it in detail considering all available facts and evidences.

Plant /Dept. Level committee will classify the violation and level of actions as per consequence matrix mentioned at Section 6. If the level of actions required is up to Verbal or Written Correction contact, same shall be concluded by the Plant / Dept. Level committee with copy to Site Level committee.

Plant /Dept. Level committee will initiate process for LPR ZT violation by next working day of its submission by the intervener.

5. If the concluded Level of actions are recommended as Suspension (S) or Termination (T) , Plant /Dept. Level committee will make recommendations and forward it to the Site Level committee.
6. On receiving the details from Plant/Dept. Level LPR ZT committee, Site LPR ZT committee will review the violation as recommended by Plant/Dept. Level committee.

Site Level LPR ZT committee will review the evidence that the violation involved is LPR ZT violation or not? They will interview the person involved in violation and recommend suitable corrective action on penalty as per consequence matrix.

If Site Level LPR ZT committee decides that subject violation needs action up to Verbal or Written Correction contact, then the same will be sent back to respective Plant/Dept. Level committee with recommendation for action. If after review and investigation, Site Level committee concludes violation as Suspension or Termination, the action will be recommended to the Site President for employees and to the respective Engineering In charge and Head Contract cell for contractor employees.

Site level committee will give adequate opportunity to hear violator's case on 'Why this has occurred?'

7. If the violation involves a member of the Plant Level committee then in the form prescribed, Intervener can directly report such case to Site Level committee Secretary. In such cases, steps mentioned above at Sr. No 3 & 4 shall be performed by Site Level committee.

### **Violations resulted in Incidents (Actual Consequences)**

The violations to be considered at above mentioned steps are based on potential consequences of the violation act. In case of actual consequences (Incident), Site Level LPR ZT committee will review the investigation report submitted by the Chairman of Investigation team. They will review any violation of LPR ZT rules, based on the facts mentioned in the report. Site Level LPR ZT committee will decide the level of action, if felt necessary through accountability process.

### **7.1 Records Management**

Site Management intends to develop web based system for effective entry, review and processing of LPR ZT violation cases.

However, till the time IT system is developed, hard copy formats are to be used for reporting purpose and to be submitted to Plant Manager /Dept. Head as hard copy or by scanned copy of format through E-mail. It is essential that, Plant/Dept. Level committee start review process on the next working day and take appropriate decisions.

### **7.2 Grievances Management**

Grievances, on concluded level of actions on violators, can be challenged by violator. Once informed about actions, violator can register their grievances (if any) in writing, to Site level committee. Site Level committee will once again review the process applied for its appropriateness for such grievances.

**Annexure I**  
**Format for Reporting LPR ZT Violation**

<b>Name of Intervener (Reporter):-</b>	
<b>EC No / EP No:-</b>	
<b>Details of Employee Involved in Violation</b>	
<b>Name of the Employee / Contractor Employee</b>	
<b>EC / EP No</b>	
<b>Plant / Department</b>	
<b>Name of Contractor Agency (If violation involves contractor employee)</b>	
<b>Date &amp; Time</b>	
<b>Location at which violation was observed (Describe in brief)</b>	
<b>Brief Description of Activity in which violation was observed (Brief Description)</b>	
<b>Primary Details on Violation</b>	
Is Person aware of the LPR ZT rules? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Is he/she trained for performing the task which involved violation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Are there any situational difficulties in performing activities where violation is Observed? (e. g. Low Illumination, High Noise, Resource not provided etc.) Yes <input type="checkbox"/> No <input type="checkbox"/>	
Is person involved assigned challenging timelines or was forced to bypass Procedure/take shortcut? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Is it a part of individual's repetitive behaviors / habits? Yes <input type="checkbox"/> No <input type="checkbox"/>	
<b>Primary Details on Potential Consequences (What could have happened?)</b>	
<b>State Potential Consequence could have been there due to violation</b>	
MTC <input type="checkbox"/>	RWC <input type="checkbox"/> LWC <input type="checkbox"/>
Fatality <input type="checkbox"/>	Multiple Fatality <input type="checkbox"/>
<b>This filled in form is to be handed over to Plant Manager or Dept. Head physically or using scanned copy through mail.</b>	

\_\_\_\_\_ (Signed by Intervener)

**Annexure II**

**Format for Recommending LPR ZT Violation**

*(To be filled by Plant Dept. Level LPR ZT Committee or Site Level LPR ZT Committee)*

<b>Name of Intervener:-</b>	
<b>EC No / EP No :-</b>	
<b>Details of Employee Involved in Violation</b>	
<b>Name of the Employee / Contractor Employee</b>	
<b>EC / EP No</b>	
<b>Plant / Department</b>	
<b>Name of Contractor Agency (If violation involves contractor employee) and RIL Engineering Incharge</b>	
<b>Date &amp; Time</b>	
<b>Location at which violation was observed</b>	
<b>Brief Description of Activity in which violation was observed</b>	
<b>Classification of Violation [Please attach evidence /proof, if any]</b>	
Unintentional / Situational	Yes <input type="checkbox"/> No <input type="checkbox"/>
Routine	Yes <input type="checkbox"/> No <input type="checkbox"/>
Haste / Shortcut	Yes <input type="checkbox"/> No <input type="checkbox"/>
Negligence	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>Classification of Consequences</b>	
MTC <input type="checkbox"/>	RWC <input type="checkbox"/> LWC <input type="checkbox"/>
Fatality <input type="checkbox"/>	Multiple Fatality <input type="checkbox"/>
<b>Level of Action derived from Matrix</b> <i>(Refer Section 6)</i>	
<b>Any Past Records of LPR ZT Violation</b> Yes <input type="checkbox"/> No <input type="checkbox"/>	
Brief Details (If Yes)	
<b>Final Level of Action concluded /Recommended</b>	

\_\_\_\_\_ (Signed by Members)