Guidance for
The Management of Change in the Offshore Environment

IMCA S&L 001
April 1999
The International Marine Contractors Association (IMCA) is the international trade association representing offshore, marine and underwater engineering companies.

IMCA promotes improvements in quality, health, safety, environmental and technical standards through the publication of information notes, codes of practice and by other appropriate means.

Members are self-regulating through the adoption of IMCA guidelines as appropriate. They commit to act as responsible members by following relevant guidelines and being willing to be audited against compliance with them by their clients.

There are two core committees that relate to all members:

- Safety, Environment & Legislation
- Training, Certification & Personnel Competence

The Association is organised through four distinct divisions, each covering a specific area of members’ interests: Diving, Marine, Offshore Survey, Remote Systems & ROV.

There are also four regional sections which facilitate work on issues affecting members in their local geographic area – Americas Deepwater, Asia-Pacific, Europe & Africa and Middle East & India.

**IMCA S&L 001**

This report provides guidance to tackle what is recognised as the cause of a number of major incidents.

A plan is developed to complete a job – the hazards associated with the planned course of action have been identified and addressed. In the course of executing the planned activity, circumstances change and those on the spot have to adopt and develop a new way of completing the work. There are hazards associated with the ‘new way’ – these are not identified at the time – things go wrong, sometimes very, very wrong.

This guidance is aimed at helping to develop a culture of pausing to assess and address the hazards associated with change, and taking any necessary measures to address the new hazards before proceeding.

This guidance is based on the cumulative experience gained in a number of the larger companies in IMCA membership.

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The information contained herein is given for guidance only and endeavours to reflect best industry practice. For the avoidance of doubt no legal liability shall attach to any guidance and/or recommendation and/or statement herein contained.
1. **Introduction**

Offshore experience has shown that many major incidents occur when changes are made to procedures, equipment, activity or approved practice without re-evaluation of potential impacts with reference to established procedures. To address such weakness, IMCA has developed the following generic guidance for managing operational change.

2. **Purpose**

Operational changes may pose a hazard and increase risk exposure, requiring better control measures to prevent equipment damage, limit environmental impacts and maintain acceptable levels of safety. This guidance aims to help IMCA members manage operational change effectively.

3. **Scope**

It is envisaged that this guidance may be applied to the management and documentation of:

- Operating change involving equipment
- Equipment change involving engineering and/or design
- Organisational change to team structures, competence and staffing
- Procedural change to approved methods or agreed practices

4. **Management of Operational Change Process/Flow Diagram**

A flow diagram describing the Management of Operation Change process is set out at Appendix 1.

5. **Guidance for Managing Operational Change**

The key steps in the flow diagram (Appendix 1) are discussed below.

*Identify change or the need to request change*

This guidance cannot define change precisely for all IMCA members. Nevertheless, when preparing your organisation’s procedure for managing...
operational change, criteria should be specified with which personnel at all levels may evaluate, identify and request a change.

**Consultation**

Discussion of potential change may take a variety of forms and follow a number of stages.

Minor change can have a major impact so consultation will often involve a wide range of personnel with the experience, knowledge and authority required to judge where change is required and how it will be most effective. In some cases effective consultation may result in a decision that change is not required.

**Hazard identification and risk assessment**

Identify items or areas affected by the change under consideration. Utilise appropriate risk assessment tools and techniques to determine the potential impacts of a proposed change, e.g. perform a hazard identification study or job safety analysis.

**Develop or revise control measures**

Determine appropriate measures with which to manage the assessed risk. This may include revised procedures or plans, equipment modifications and staff training.

**Obtain approvals and authorise change**

With reference to your organisation’s management system, ensure that staff with the relevant experience, authority and accountability sanction change.

**Communicate and implement approved activities/procedures**

Take practical steps to create awareness, build support, promote participation and ensure compliance with approved changes by all relevant personnel.

**Appendices**

Appendix 1 – Flow diagram ‘Management of Operational Change Process’

Appendix 2 – Sample documentation for change request and records
Appendix 1

Management of Operational Change Process

Identify change or the need to request change and appropriate form of recording

Consultation
Discuss the need for change in activities/procedures

Need for change rejected

Hazard identification and risk assessment
e.g. HAZID, Safe Job Analysis

Develop or revise control measures
e.g. staff training, equipment modification

Obtain approvals and authorise change

Communicate and implement approved activities/procedures
e.g. toolbox talks, activity plans

Safe operations
## Appendix 2

### Change Request

<table>
<thead>
<tr>
<th>CR No:</th>
<th>Date:</th>
</tr>
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<table>
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<tr>
<th>Client:</th>
<th>Project:</th>
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</thead>
</table>

#### Part 1

**Description Of Change:**

**Reason:**

<table>
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<tr>
<th>Requested By:</th>
<th>Initial Review:</th>
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<tbody>
<tr>
<td></td>
<td>*Approved /*Rejected</td>
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<th>Signed:</th>
<th>Date:</th>
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**Reason For Rejecting:**

#### Part 2

**Items/Areas affected by change:**

<table>
<thead>
<tr>
<th>Operating Procedure</th>
<th>HSE Procedure</th>
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<tbody>
<tr>
<td>Organisation Procedure</td>
<td>Installation</td>
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<tr>
<td>Engineering Criteria</td>
<td>Other (specify)</td>
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<tr>
<td>Equipment Certification</td>
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**Comments:**

**Impact Review:**

(Indicate: cost, cost saving, improvement to safety, effects on schedule, etc.)

**Actions:**

<table>
<thead>
<tr>
<th>Consultation</th>
<th>Amended Procedures or Drawings</th>
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</thead>
<tbody>
<tr>
<td>Performed Hazid/Risk Assessment</td>
<td>Obtained Approvals</td>
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<tr>
<td>Performed Safe Job Analysis</td>
<td>Communicated Change</td>
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**Remarks:**

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<th>(Onshore (if Required))</th>
<th>Client (when required)</th>
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# Change Request Register

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<tr>
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<th>CR Description</th>
<th>Approved Date</th>
<th>Rejected Date</th>
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Client:  
Project: