<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>DOSHS</td>
<td>Directorate of Occupational Safety and Health Services</td>
</tr>
<tr>
<td>OSH</td>
<td>Occupational Safety and Health</td>
</tr>
<tr>
<td>OSHA</td>
<td>Occupational Safety and Health Act</td>
</tr>
<tr>
<td>POSHAC</td>
<td>Petroleum Occupational Safety and Health Advisory Committee</td>
</tr>
<tr>
<td>GOK</td>
<td>Government of Kenya</td>
</tr>
<tr>
<td>O&amp;G</td>
<td>Oil and Gas</td>
</tr>
</tbody>
</table>
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1 INTRODUCTION AND OVERVIEW

1.1 CONTEXT
This document sets out guidelines for inspecting and auditing occupier asset(s) and occupier OSH management system(s) implemented for Oil and Gas (O&G) operations and related activities in Kenya.

1.2 OBJECTIVES
The principal objective of these guidelines and practice standards is to provide the Enforcer with a methodology to be adopted by its officers (acting as Auditors), so that they may check, control and ensure Occupiers’ (auditee) compliance with the OSH Regulations that have been specified for the O&G sector.

These Guidelines include:

i. Audit principles and tools covering:
   o the scope and breadth of the audit;
   o overall audit methodology and approach; and
   o audit scoring system and its associated grid.

ii. Audit methodology covering:
   o detailed approach to audit initiation (i.e. programming, planning, preparation);
   o conducting audits & inspections; and
   o associated audit outputs.

1.3 SCOPE OF APPLICATION
The current Guidelines and Standards should serve to guide Enforcer auditors in their work and allow them to effectively assess the extent of Occupier compliance with the O&G Regulations. These guidelines and standards also establish how Occupiers can:

i. Fulfill safety case requirements;
ii. Implement and maintain relevant safety cases;
iii. Demonstrate adequate risk management on their premises;
iv. Implement an adequate occupational safety and health management system;
v. Prepare adequate response measures should an emergency occur; and
vi. Fulfill any sector specific requirements that may apply to certain activities within the petroleum value chain and along segments (i.e. downstream, midstream, and upstream segments).

1.4 DEFINITIONS AND ABBREVIATIONS

<table>
<thead>
<tr>
<th>TERMS</th>
<th>DEFINITIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Activity</td>
<td>An activity refers to Occupier operations (i.e. drilling, production, storage) and can be categorized by the relevant Petroleum industry sector or segment i.e. upstream, midstream and/or downstream.</td>
</tr>
</tbody>
</table>
### Audit (Regulatory)
An audit is a systematic, independent and documented process carried out by an Auditor, which aims to verify implementation of systems and processes by an Auditee through the review and assessment of Audit evidence (which provides the means of objectively determining the level of compliance with the OSH Regulations).

### Audit evidence
Audit evidence means any record, statement of fact, template, procedure, documented observation or other information which is verifiable and relevant to the audit findings.

### Auditee
Auditee refers broadly to the Occupier, or Occupier-affiliated Entity being audited. This term can also be applied to a representative or onsite person appointed by an Occupier and designated as responsible and liable for the implementation of the OSH Regulations.

### Auditor
An Auditor refers to the Enforcer’s **occupational safety and health officer** in charge of conducting a regulatory audit. **Note:** In this document, an external advisor contracted to conduct a Regulatory Audit on behalf of the Enforcer is not considered an Auditor.

### Audit scope
The audit scope refers to the range of activities and time period under examination in relation to the part(s) of the Regulation being assessed for compliance.

### Audit plan
An audit plan is the formal description of the audit objectives, scope, duration, location(s), parties involved and steps that will be carried out during the course of the audit.

### Compliance
Compliance refers to the fulfilment of a regulation’s requirements by the Occupier.

### DOSHS
Directorate of Occupational Safety and Health Services

### Enforcement Notice
Enforcement Notice refers to notice(s) issued by the Occupier following the results of an Audit. There are two types of enforcement notices: Improvement Notices and Prohibition Notices.

### Entity
An Entity refers to a site or a location or a subsidiary or a process unit controlled by an Occupier.

### Improvement Notice
An Improvement Notice is a type of Enforcement Notice issued by the Enforcer indicating that an Auditee has been found to be non-compliant with regards to a Regulation and has at least 21 days to take remedial action or be liable for prosecution.

### Inspection
An inspection refers to a site visit conducted by an Auditor to control OSH implementation during operations / operational phase.

### Non-Compliance
Non-Compliance refers to the non-fulfillment of an Occupier’s obligations under the requirements of a Regulation and results in the issuance of an Enforcement Notice by the Enforcer.

### OSH
Occupational Safety and Health

### POSHAC
Petroleum Occupational Safety and Health Advisory Committee

### Process
The Process refers to the operations that enable the treatment and/or disposal of hydrocarbons (i.e. dehydration, desulfurization, gas condensation) conducted within an Occupier Entity.
<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prohibition Notice</td>
<td>A Prohibition Notice is a type of Enforcement Notice which notifies an Occupier of non-compliance with obligations under the requirements of a Regulation, and whose non-compliance presents the risk of serious personal injury thereby requiring the Occupier to immediately cease the non-compliant activity through the issuance of such a notice.</td>
</tr>
<tr>
<td>Prosecution</td>
<td>A Prosecution is the conduct of legal proceedings against an Auditee/Occupier when sufficient evidence has been collected to demonstrate a severe breach of the law has occurred.</td>
</tr>
</tbody>
</table>

*Table 1: Terms and Definitions*
1.5 RESPONSIBILITIES

1.5.1 AUDITOR
An Auditor is responsible for:

- Programming, planning and preparing regulatory audits in a serious and professional manner.
- Conducting regulatory audits with honesty, diligence, and in a responsible manner.
- Performing the audit in an impartial manner i.e. remaining fair and unbiased in all their dealings.
- Complying with any and all applicable legal requirements during the entire course of the regulatory audit, as well as displaying exemplary behavior (such as the use of adequate personal protective equipment).
- Reporting truthfully and accurately all relevant observations made during the course of the audit, and based on factual, verifiable and reliable evidence.
- Ensuring confidentiality and security of the information that has been examined and/or reported during the course of audit process.
- Issuing formal enforcement notices in writing, such as an Improvement Notice or a Prohibition Notice, as may be required.
- Prosecuting an Occupier when severe breaches to the OSH Regulations are observed.

1.5.2 AUDITEE
An auditee (occupier) is required to:

- Facilitate the implementation of the Audit Plan transmitted by the Auditor.
- Ensure availability of interviewees within its organization to provide sufficient and reliable feedback/discussions to Auditor.
- Provide all reliable evidence sought by the Auditor with honesty and report, without omission, any information related to non-compliant issues.
- Grant full and unfettered access to sites as requested by Auditors and ensure that Auditors can inspect sites in normal operating conditions.
- Implement remedial plans when required and further to Auditor notices within the allotted timeframes.

Note: As provided within the OSH Regulations, an Auditee/Occupier has a right to appeal against OSH Enforcement Notices.
2 PRINCIPLES OF REGULATORY AUDITS

Generally, all Regulatory Audits should be performed in an ethical manner and the Auditee should feel comfortable about the Auditor’s integrity. It is therefore the Auditor’s role to ensure that the Occupier understands that the Audit is not a punishment, but an exercise to facilitate continuous OSH related improvements. In addition, the OSH Regulations have been developed to promote best practices and ensure the safest possible working environments.

Regulatory Audits shall be conducted in a standard manner with Auditors should striving to ensure that audits are:

- Objective;
- Impartial;
- Independent (i.e. free of any conflict of interest);
- Truthful;
- Factual;
- Accurate; and
- Conducted rigorously with highest regard for professional standards;

Given the above, Regulatory Audits shall adhere to the principles set out below.

2.1 AUDIT OBJECTIVES

The Regulatory Audit is aimed at providing the Enforcer with an effective and trustworthy tool for defining and implementing the OSH Regulations.

The Regulatory Audit also provides the Occupier with reliable information on which Occupier can reliably use to improve its OSH management system, correct any inadequate practices, and/or increase internal Corporate OSH standards and requirements.

2.2 APPLICABLE REGULATIONS

The Regulatory Audit shall be conducted to principally ensure conformity with the provisions of the following Acts, Rules and Regulations:

- Occupational Safety and Health Act No. 15 of 2007
- Occupational Safety and Health (Oil & Gas) Regulation 2019
- Factories (Woodworking machinery) Rules
- Factories (Examination of plant) Order
- Factories (First-Aid) Order
- Factories (Cellulose Solutions) Rules
- Factories (Docks) Rules
- Factories (Extension of Application) Order
- Factories (Form of Abstract) Order
- Factories (General Register) Order
- Factories and Other Places of Work (Safety and Health Committees) Rules
- Factories and Other Places of Work (Medical Examination) Rules
- Factories and Other Places of Work (Noise Prevention and Control) Rules
- Factories and Other Places of Work (Fire Risk Reduction) Rules
- Factories and Other Places of Work (Hazardous Substances) Rules
2.3 AUDIT SCOPE
The Regulatory Audit shall allow the Enforcer to answer the following key questions:

- Has the Occupier developed system(s) that comply with the OSH O&G Regulations?
- Have these systems been implemented and are they effective?
- Are these systems efficient?

In order to answer these questions, Regulatory Audits shall combine the appraisal of the documentation comprising the Occupier’s OSH management systems together with a field inspection. In line with this approach, the Regulatory Audits shall cover:

- **Occupier OSH Management System Review**
  This aspect of the Audit aims to control the management systems developed by the Occupier to ensure safe operations, to assess their adequacy with regards to the operational risks faced by the Occupier, to evaluate whether the system effectively complies with the following sections of the OSH Regulations:
  
  o Part II: Development and compliance to safety case regulation,
  o Part III: Management of risks (design, external risks, operational)
  o Part IV: OSH management system (documentation & implementation)
  o Part V: OSH reporting system (internal / external)
  o Part VI: Emergency response preparedness
  o Part VII, VIII and IX: O&G sectors specifications, as they apply

- **Inspection of Occupier’s Operational Implementation of OSH Management System**
  This phase of the Audit requires an onsite inspection which aims to determine whether the management system functions and reaches the desired levels of effectiveness when put into practice at the workplace. To illustrate, this type of inspection may entail a review and assessment of the:
  
  o Quality of the risk assessments performed
  o Level of knowledge of operational staff
  o Use of the Permit to Work forms and the quality of the information stated on them
  o Adequacy of Lock-Out Tag-Out procedures
  o Proper identification of downgraded situation and their management
  o Adequacy of equipment installed for emergency preparedness and readiness
  o Supervision of sub-contractors
  o OSH toolbox talks and meetings and the level of effective use in the workforce
  o Equipment certification, maintenance and condition
  o Means of transport, transfer and accommodation of personnel

In some cases, a Regulatory Audit may be limited to a simple site inspection depending on the context (see next section).
2.4 AUDIT TYPOLOGIES

2.4.1 TYPES OF AUDITS AND THEIR SCOPE

An Audit serves to ensure compliance with the OSH O&G Regulation over the full range of Activities performed by the Occupier, from the managerial to the operational level of the Occupier’s organization.

Summarized in the table below are the types of Regulatory Audits and Inspections that can be performed depending on the scope of the Regulatory Audit to be carried out.

<table>
<thead>
<tr>
<th>Type of audit</th>
<th>SCOPE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial audit</td>
<td>▪ Initial audits shall be initiated when the Enforcer has never conducted a full OSH Regulatory Audit on an Occupier’s site.</td>
</tr>
<tr>
<td></td>
<td>▪ Initial audits shall be performed as a first regulatory appraisal of an Occupier’s OSH management system and ensure that it complies with the whole OSH O&amp;G regulation.</td>
</tr>
<tr>
<td></td>
<td>▪ Initial audits shall ensure that all OSH systems detailed in an Occupier’s safety case are properly implemented on its sites.</td>
</tr>
<tr>
<td></td>
<td>▪ Initial audits shall cover the Occupier OSH management system AND include a site inspection.</td>
</tr>
<tr>
<td>Partial audit</td>
<td>▪ Partial audits aim to control Occupier compliance with specific parts of the regulation:</td>
</tr>
<tr>
<td></td>
<td>- Part II: Development and compliance with safety case regulation,</td>
</tr>
<tr>
<td></td>
<td>- Part III: Management of risks (design, external risks, operational)</td>
</tr>
<tr>
<td></td>
<td>- Part IV: OSH management system (documentation &amp; implementation)</td>
</tr>
<tr>
<td></td>
<td>- Part V: OSH reporting system (internal / external)</td>
</tr>
<tr>
<td></td>
<td>- Part VI: Emergency response preparedness</td>
</tr>
<tr>
<td></td>
<td>- Part VII, VIII and IX: O&amp;G sectors specifications</td>
</tr>
<tr>
<td></td>
<td>▪ Partial audits are to be performed when specific OSH issues need to be sorted out and are being reviewed by an Enforcer Auditor.</td>
</tr>
<tr>
<td></td>
<td>▪ Partial audits shall cover the Occupier OSH management system and can be completed with a Site inspection as required and depending on the specific OSH issues being investigated.</td>
</tr>
<tr>
<td>Site Inspection*</td>
<td>▪ Site Inspections are to be conducted during the Occupier’s operational phases and aim to evaluate field implementation of standards communicated to the Enforcer (through the safety case, further to analysis of Occupier documents required, further to Occupier OSH management system audit or following an Auditor’s request).</td>
</tr>
<tr>
<td></td>
<td>▪ Site Inspections shall be undertaken in the contexts laid out in Section 2.4.2 and should focus on the adequacy of safety and health issues related to the type of operations and equipment involved.</td>
</tr>
<tr>
<td>Renewal audit</td>
<td>▪ After a period of 5 years from the completion of the Initial audit, Enforcer shall perform a comprehensive OSH audit in order to ensure that the Occupier still complies with the OSH O&amp;G Regulation.</td>
</tr>
<tr>
<td></td>
<td>▪ Renewal audits also aim to ensure OSH systems are improving, effectively correcting previously identified deficiencies, and aligning Occupier safety case to any major and/or material changes to operations and facilities.</td>
</tr>
<tr>
<td></td>
<td>▪ Renewal audits shall cover the Occupier OSH management system AND include a site inspection.</td>
</tr>
</tbody>
</table>
2.4.2 TYPES & SCOPE OF AUDIT BASED ON CONTEXT OF OPERATIONS

Enforcer shall determine the type of audit and/or inspection to perform depending on the associated project phase as defined above.

Summarized in the table below are the types of Regulatory Audits and Inspections that can be performed based on the activities currently being undertaken by an Occupier.

<table>
<thead>
<tr>
<th>CONTEXT</th>
<th>TYPE OF AUDIT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial audit</td>
<td>✓</td>
</tr>
<tr>
<td>Partial audit</td>
<td>✓</td>
</tr>
<tr>
<td>Inspection</td>
<td>✓</td>
</tr>
<tr>
<td>Renewal</td>
<td>✓</td>
</tr>
<tr>
<td>Submittal of safety case and start of Occupier activity</td>
<td>✓</td>
</tr>
<tr>
<td>An Occupier that has never been audited</td>
<td>✓</td>
</tr>
<tr>
<td>Reporting by Occupier of dangerous occurrence, accident or incident</td>
<td>✓</td>
</tr>
<tr>
<td>Notification of design change</td>
<td>✓</td>
</tr>
<tr>
<td>Poor overall OSH performance (KPI) Reported</td>
<td>✓</td>
</tr>
<tr>
<td>Denunciation of inappropriate working conditions within Occupier entity</td>
<td>✓</td>
</tr>
<tr>
<td>Request / report from county agents, governor, other agencies</td>
<td>✓</td>
</tr>
<tr>
<td>Evolution of external vulnerabilities</td>
<td>✓</td>
</tr>
<tr>
<td>Previous Audit / inspection follow up</td>
<td>✓</td>
</tr>
<tr>
<td>Initial Audit performed more than 5 years ago</td>
<td>✓</td>
</tr>
</tbody>
</table>

Table 3: Summary of the Types of Regulatory Audits based on Context of Activities

2.5 PRESENTATION OF METHODOLOGY
The following flowchart presents the overall methodology an enforcer’s Auditor shall adhere to when conducting a Regulatory Audit:

**PRE-AUDIT**
- Determining the type of audit and the scope
- Defining the audit plan, identifying the site(s) / location(s) / activite(s) and the duration of regulatory audit
- Issuing the audit plan to occupier and validation
- Identification of occupier documentation required
- Audit preparation

**CONDUCTING AUDIT**
- Opening the audit
- Conducting the OSH management system audit
- Conducting the site inspection
- Cross checking field observation and management system
- Addressing non compliance
- Closing the audit

**POST-AUDIT**
- Preparing / writing audit report
- Issuing an enforcement notice
- Tracking and following up on a remedial action plan
- Debriefing Enforcer on audit findings
- Prosecution and appeals

*Figure 1: Regulatory Audit Methodology*
2.6 AUDIT GRID AND SCORING

The audit process is aimed at making possible to identify the strengths and weaknesses of the Occupier’s OSH management system, its implementation and operational efficiency, as well as identify any areas requiring correction and/or improvement. Auditors conducting the assessments should also be able to highlight areas of non-compliance to Occupiers and issue Enforcement Notices when required.

In addition to presenting a grid of areas to be inspected and assessed, an overall score should be given to appraise whether an Occupier is compliant with the OSH O&G Regulation, operates in a safe manner, or if operations should be stopped until any identified improvement actions are implemented.

For that purpose, Auditors shall fill in an Audit and Inspection Grid and score the Occupier for each area of O&G Regulation that is audited. In order to define the Enforcer’s recommended actions further to the audit results and score, the Auditor shall use the following audit criteria matrix:

<table>
<thead>
<tr>
<th>Score (S)</th>
<th>Level</th>
<th>Decision</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>S &lt; 40%</td>
<td>!❼❼❼❼❼</td>
<td>Totally Unacceptable</td>
<td>▪ Auditor shall immediately suspend Occupier’s activities</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>▪ Major and urgent remedial actions are required and mandatory.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>▪ <strong>Enforcer will issue a Prohibition Notice to the Occupier</strong></td>
</tr>
<tr>
<td>40% &lt; S &lt; 60%</td>
<td>!❼❼❼</td>
<td>Unacceptable</td>
<td>▪ Major improvements and/or significant enhancement are required to reach minimal compliance standards with the OSH O&amp;G Regulations.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>▪ Occupier is required to comply within a mandated timeframe to avoid suspension of operations.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>▪ <strong>Enforcer will issue an Improvement Notice to the Occupier</strong></td>
</tr>
<tr>
<td>60% &lt; S &lt; 80%</td>
<td>!❼❼❼</td>
<td>Acceptable</td>
<td>▪ Occupier is deemed to meet the minimal compliance criteria with the OSH O&amp;G Regulation.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>▪ Correction of minor OSH deficiencies must be completed within a reasonable time frame.</td>
</tr>
<tr>
<td>S &gt; 80%</td>
<td>!❼❼❼❼❼❼</td>
<td>Entirely Acceptable</td>
<td>▪ The current management system and its implementation are fully satisfactory and compliant to the OSH O&amp;G Regulations.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>▪ Good practices should be recognized and promoted.</td>
</tr>
</tbody>
</table>

*Figure 2: Regulation Audit and Inspection Scoring Methodology*
3 CONDUCTING THE REGULATORY AUDITS AND INSPECTIONS
As mentioned earlier the audit cycle covers activities before, during, and after the audit. The section below outlines the required actions in each of these phases i.e. when preparing for the audit, when conducting the audit, and finally when closing out the audit process.

3.1 PREPARING FOR AN AUDIT
When preparing for an audit, the following activities are required:
- Define the audit plan
- Identify the documentation that will be reviewed from the Occupier
- Prepare the audit and inspection plan (including preparing and printing scoring grids, etc.)
- Prepare for the audit and inspection (including review of the OSH Regulations, understanding Occupiers’ activities, review of previous audit reports, etc.)

The sections below elaborate on each of these activities.

3.1.1 DEFINING THE AUDIT PLAN

3.1.1.1 AUDIT SCOPE AND SCHEDULING
The Auditor shall clearly determine the objectives of the Audit, the scope and the type of Audit to be carried out prior to the launch of the audit process. This information is owned by the Auditor and need not be communicated to the Auditee.

The Auditor shall establish contact with the Occupier’s management team so as to verbally notify that a Regulatory Audit will be performed on an Occupier’s Entity.

While programming the audit with the Occupier, the Auditor shall review:
- Location of head offices
- Headcount of people working on Auditee premises
- Type of organization (organization chart)
- Description of site(s) and location(s) where activities are being carried out
- Description of activities undertaken by Occupier
- Nature and complexity of the operational processes linked to these activities

The Auditor should provide the Occupier with the following information:
- When and where the audit will be conducted
- What topics and issues the audit will cover
- Key personnel to be interviewed during the course of the Audit
- An overview of the regulatory steps involved in carrying out this Audit
- Presentation of the Audit timeframe (pre-audit, audit and post-audit),
- Information requested of the Occupier in order to complete the Audit process (e.g. required Occupier documentation, list of interviewees and availability, unfettered site access, etc.). Any requests for documentation prior to the audit should state clearly the deadline for the Occupier to present the information to the Auditor.

A template for the notice of audit visit along with the information request is provided in APPENDIX 1: NOTICE OF AUDIT VISIT AND REQUEST FOR DOCUMENTATION.
3.1.1.2 SITE(S) AND LOCATION(S) TO BE AUDITED

Once contact has been established with the Occupier, and the requested information has been transmitted to the Auditor, the Auditor will be able to establish the list of site(s) and the location(s) where the Audit will be performed.

In order to properly define Audit site(s) and location(s), the Auditor should be able to answer the following questions:

- Where will the Auditee’s OSH management system and documentation be audited?
  - This will depend in part on where the Occupier’s management team is located.
    - Management interviews should not be limited to OSH positions. The Audit should allow for interviews with Corporate Directors, Human Resource Managers, Production Managers, Maintenance managers and any other relevant individual whose position may have a relevance to operational safety.
  - Where did the Occupier define and develop its OSH systems?
  - Where does the Occupier prepare and maintain its safety case, and where might safety case relevant data be verified?

- Which site(s) will be inspected and evaluated in the Audit process?
  - Where the Occupier has different sites running the same activities, the Auditor may choose whether the Audit will be carried out on all concerned sites, or on a sample that is considered sufficiently representative of Auditee’s operations.
  - Where the Occupier has different sites running different activities, the Auditor may define a site inspection for each activity covered by the Audit scope.
  - Where the Occupier has on its site a simple process or a complex combination of processes, the Auditor should define, according to the site’s layout, which area(s) should be inspected.

Site(s) and location(s) should be clearly identified by the Auditor and mentioned in the Audit Plan, which plan should be submitted to the Auditee a minimum of 15 days prior to the date of Audit. A template for the Audit Plan to be used in this exercise is provided in Appendix 2: Audit Plan Template.

3.1.1.3 DETERMINING THE AUDIT DURATION

Once the scope and type of the Audit are set, and the site(s) and location(s) to be inspected have been identified, the Auditor shall continue planning the Audit and define the Audit duration.

To do so, the Auditor shall consider the following:

- An OSH management system can usually be audited within one (1) full day. This duration takes into consideration the time required for assessment of the documentation related to the OSH O&G Regulation, interviews with document owners (those in charge to develop, deploy & implement, maintain the documentation), and review of all associated forms and templates.
  - NOTE 1: If the Auditor is carrying out a Site Inspection, then the OSH management system audit is not required.
NOTE 2: The Auditor may increase or decrease this duration according to the occupier’s OSH documentation (i.e. complexity, structure, procedure level of details etc.) and organization chart (number of services and number of personnel). The assumption is that the more complex the documentation, the more time is required.

NOTE 3: In most cases, the OSH management system review for a Partial Regulatory Audit can be completed within half a day.

Typically, a site inspection for a “normal” O&G site is about one full day. This duration includes the site tour and the interviews of workers.

NOTE 1: This duration is estimated for an Occupier Entity that runs only one activity. Additional activities should increase this duration by half-a-day to one full day, as case may be.

NOTE 2: Complex facilities with numerous types of equipment and hazardous processes will likely require the Auditor to increase the duration.

The Pre-Audit preparation time varies from a half-day to three days depending on the Occupier’s site and activities. Similarly, Post-Audit work varies from one day to three to four days depending on the complexity of the Audit’s findings and the report and Enforcement notice to issue, when that is necessary.

Given the above, then the duration of a Regulatory Audit could span between two and eight days from Audit preparation to reporting, depending on the factors discussed above.

The table below provides the Enforcer with some illustrative examples of required durations for conducting an OSH Regulatory Audit on an Occupier site. This duration does not include the time spent by an Auditor on both the Pre-Audit preparation and Post-Audit phases. It also does not include travel time to the Occupier’s Site from the Enforcer’s offices.

<table>
<thead>
<tr>
<th></th>
<th>Initial</th>
<th>Partial</th>
<th>Inspection</th>
<th>Renewal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Seismic crew</td>
<td>2 days</td>
<td>1 day</td>
<td>0.5 day</td>
<td>2 days</td>
</tr>
<tr>
<td>Drilling rig</td>
<td>2 days</td>
<td>1 day</td>
<td>0.5 day</td>
<td>2 days</td>
</tr>
<tr>
<td>Offshore production</td>
<td>2 days</td>
<td>1 day</td>
<td>0.5 day</td>
<td>2 days</td>
</tr>
<tr>
<td>platform</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Table 4: Summary of Estimated Durations for Conducting Regulatory Audit and Inspection

<table>
<thead>
<tr>
<th>STEPS</th>
<th>ACTIONS</th>
<th>DEADLINES</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PRE-AUDIT</strong></td>
<td>Programming the Audit and providing notice to the Occupier that they will undergo a Regulatory Audit</td>
<td>T-30 days to DoA</td>
</tr>
<tr>
<td></td>
<td>Issuing request for Auditee documentation</td>
<td>T-30 days to DoA</td>
</tr>
<tr>
<td></td>
<td>Finalizing the Occupier OSH documentation gathering process</td>
<td>T-15 days to DoA</td>
</tr>
<tr>
<td></td>
<td>Issuing the Audit Plan to the Occupier</td>
<td>T-15 days to DoA</td>
</tr>
<tr>
<td></td>
<td>Analysis of documentation and Audit preparation</td>
<td>T-7 days to DoA</td>
</tr>
<tr>
<td><strong>AUDITING</strong></td>
<td>Conducting audit on Occupier site(s)</td>
<td>DoA</td>
</tr>
<tr>
<td><strong>POST-AUDIT</strong></td>
<td>Issuing Enforcement Notices</td>
<td>ASAP</td>
</tr>
</tbody>
</table>

#### 3.1.1.4 PREPARING AUDIT TIMELINES

In order to effectively run a Regulatory Audit, the following actions should be conducted as per the provided timelines. The point of reference is the Date of audit (DoA) when the Regulatory Audit will be performed on Occupier site.
### Table 5: Timelines for Conducting a Regulatory Audit

<table>
<thead>
<tr>
<th>STEPS</th>
<th>ACTIONS</th>
<th>DEADLINES</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Issuing Audit Report to Occupier</td>
<td>DoA + 30 days</td>
</tr>
<tr>
<td></td>
<td>Receipt of remedial action plan from Occupier</td>
<td>DoA + 21 days</td>
</tr>
<tr>
<td></td>
<td>Debriefing to POSHAC</td>
<td>Upon demand</td>
</tr>
<tr>
<td></td>
<td>Prosecution</td>
<td>Case by case</td>
</tr>
</tbody>
</table>

#### 3.1.2 IDENTIFICATION OF REQUIRED OCCUPIER DOCUMENTATION

The documentation required from the Occupier shall be set in relation to, and after, Enforcer analysis of the Occupier’s safety case.

Although there is some documentation that is commonly requested prior to an Audit, the Auditor shall determine the documentation that is relevant for the audit scope, the type of audit, and the activities and site(s) audited.

The Auditor will typically request the following from an Occupier prior to an Audit:

- **The list of the Occupier’s OSH documentation:** Occupiers oftentimes keep an up-to-date list of all their OSH documentation. This list should allow the Auditor to identify any additional documentation that needs to be consulted prior to an Audit.
- **Organization chart:** the organization chart should allow the Auditor to identify the key personnel to be interviewed during the Audit – their names should be noted in the Audit Plan;
- **The up-to-date Risk Register:** this will identify the risk assessments carried out prior to the Audit, or during audit and implementation during site inspection;
- **Equipment register:** for purposes of identifying the safety critical elements and assess the Occupier’s maintenance strategy and records;
- **Training register:** to evaluate whether personnel are appropriately trained for their positions, that they have understanding and training in OSH matters relevant for their positions and the activities they undertake;
- **Incident register:** to evaluate incident types, severities, and frequencies as well as review near misses specific to the Occupier and the site under audit; and
- **Action plan:** to evaluate all actions identified by the Occupier, including ongoing and closed out actions.

These documents should provide a good overview to the Auditor of where audit evidence should be sought while onsite as well as the questions and issues that should be raised during the Audit.
The above list is not exhaustive and as such, the Auditor should have a good understanding of the Occupier’s activities and facilities. Understanding the operations will allow the Auditor to request more information such as Piping & Instrument Diagrams, Process and Flowchart Diagrams, etc.

The official request for documentation shall be addressed to the Occupier sufficiently in advance so as to allow the Auditor enough time to review the documents and define the Audit Plan accordingly. The template for document request is included in the notice letter provided in APPENDIX 1: NOTICE OF AUDIT VISIT AND REQUEST FOR DOCUMENTATION.

3.1.3 AUDIT PLANNING
The Auditor shall formally establish an Audit Plan following the collection of all the information gathered in the previous step. The Audit Plan shall include, as a minimum, the following details:

- **General information**: Auditor identification, contact details, Auditee identification, type of audit to be carried out, dates and durations.
- The **list of the documentation required** and that should be made available by the Auditee during the Audit and which may be observed / consulted by the Auditor (incident reports, inspection reports, exercise reports etc.).
- The **relevant persons who are to be interviewed** for OSH system review; document’s owners and people managing the OSH processes under audit;
- The **site’s operations to be observed** and the process units to be inspected.
- The **overall Audit schedule (meetings, interviews, site inspection, close-out meeting)** and the allocated timeframe.

The Audit Plan should be tailored to the organization that is to be audited and presented to the Occupier. Its main purpose is to facilitate the efficiency and coordination of the Regulatory Audit.

The amount of detail provided in the Audit Plan should reflect the Auditor’s expectations with regards to the scope and type of Audit being carried out.

- **NOTE 1**: The Audit Plan should be sufficiently flexible to allow for any change which may arise as the Audit progresses (for example, to conduct an interview that was not initially planned).
- **NOTE 2**: The Audit Plan should be prepared as per the template provided in Appendix 2: Audit Plan Template. APPENDIX 2: AUDIT PLAN TEMPLATE (although this document may be adapted as required) and signed by the Auditor. The Plan, once signed, should be transmitted to, and formally accepted by, the Occupier or the duly appointed representative. Any objections by the Occupier to the Audit Plan should be discussed and resolved between Auditor and Auditee.

3.1.4 PREPARATION FOR THE AUDIT PROCESS
The primary function of the Audit preparation phase for the Auditor is to:
- Understand the Occupier’s activities
- Understand the site(s) configuration / layout
- Understand the OSH processes developed by the Occupier and how they may or may not comply with the law, providing an opportunity for the Auditor to carry out a preliminary assessment of the Occupier’s system.

- Identify possible gaps and/or areas that would require deeper review during the Audit.

This is a critical step for the Auditor as it influences the course of the Audit when in the Occupier site. The Auditor should properly analyze and assess all relevant information from/related to occupier prior to onsite mobilization.

During this preparation phase, the Auditor should first gather the following:

- **Occupier’s safety case (the last available revision)**
  The Auditor should have the last safety case that the Occupier issued to DOSHS. The safety case provides information on how the Occupier manages OSH issues on its premises.

- **Previous Audit reports and Occupier records**
  In addition to the safety case, the Auditor should check if the Occupier has already been audited by the Enforcer and collect previous reports from DOSHS. Additional data may also be available, such as incident records that have been reported to DOSHS.

- **Documents requested from the Occupier**
  While programming the Audit, the Auditor will have requested from the Occupier a number of documents which will serve as audit evidence. This data represents the Occupier’s “live” documentation and will be useful in determining how the Occupier is implementing the OSH management systems.

Once the above documentation has been collected, the Auditor shall perform the document review and consider whether:

- the information in the documents provided is:
  - complete (all expected content is contained in the document);
  - correct (the content conforms to other reliable sources such as standards and regulations);
  - consistent (the document is consistent in itself and with related documents); and
  - current (the content is up to date).

- the documents being reviewed cover the Audit scope and provide sufficient information to enable the Audit to occur in appropriate conditions.

- the information will enable an efficient and effective conduct of the Audit.

During the Audit preparation, the Auditor should clearly identify the issues that will need to be checked and confirmed upon arrival on the Occupier’s site.

**NOTE:** It is a good practice for Auditors to prepare notes during the audit preparation phase in order to ensure that all identified issues are raised with the Occupier and/or investigated during the audit.
3.2 AUDITING ACTIVITIES

3.2.1 KICKING OFF THE AUDIT
To initiate the audit under the best conditions, the Auditor carries out an Audit kick-off meeting. The purpose of the kick-off meeting is to:

- Establish appropriate communications with the Auditee’s representatives, introduce the Auditor, and confirm the authority under which the Audit is being carried out;
- Provide information on the Audit’s objectives, scope, methods and its expected outputs;
- Inform the Auditee of the relevant documents and records which will be required;
- Ensure the availabilities of key personnel for interviews;
- Review the ongoing activities for the site inspection;
- Explain how confidential information are used and kept;
- Ensure that all planned Audit activities can be performed and agree on the logistical arrangements for the Audit;
- Create a relationship of trust between the Auditor and the Auditee.

For Regulatory Audits consisting solely of the Site Inspection, the kick-off meeting may simply focus on communicating the fact that an Audit is being conducted and explaining the nature of the Audit.

The kick-off meeting should be formal, and records of attendance should be kept.

The kick-off meeting should be held in the presence of the Occupier’s management team and, where appropriate, those responsible for the OSH systems to be audited, such as, but not limited to the following positions:

- Chief Executive Officer or Managing Director;
- Production Manager;
- OSH Manager;
- Human Resource Manager;
- Maintenance Manager;
- Safety Committee Representative; and/or
- Other posts as appropriate

During the Audit Plan stage, the Auditor will have inspected the Occupier’s organization chart and be able to outline more extensively who should be in the Kick Off meeting.

3.2.2 OSH MANAGEMENT SYSTEM AUDIT
This OSH Management System Audit aims to control the quality of the OSH systems developed by the Occupier, their adequacy with regards to the operations and their associated risks, the extent of their implementation in the field and the overall level of compliance with the OSH O&G Regulation.

The OSH Management System Audit is conducted by applying the following methods:

- Interviewing Occupier Personnel
Managers should be interviewed to give them the opportunity to explain their OSH systems. These interviews should be identified when planning the Audit.

Technical personnel and support staff using / applying OSH systems should also be interviewed to confirm that the systems are known by the personnel and effectively implemented in every day operations.

- Presentation of issues and notes identified by the Auditor during the Audit Preparation phase, following OSH documentation review, in order to collect Occupier responses, explanations and clarifications.

- Examination of Occupier documents and review of evidence presented to the Auditor further to Audit discussions.

- Sampling techniques should be used to assess the overall OSH system by focusing attention on specific OSH systems that have been identified as potentially weak or vitally important to overall operational safety. The Auditor should require evidence from the Auditee on specific aspects of the OSH procedure being sampled. For example, an Occupier may report several incidents during the past year, in which case the Auditor would seek to randomly review some investigation reports so as to confirm that: 1) the investigation system is properly implemented and, 2) that it generates effective and relevant OSH improvement actions.

- Tracking a specific OSH procedure from beginning to end. This method consists of checking the implementation of an OSH system using a specific real-life case study. For example, the Auditor could check a design risk assessment and identify a safety critical element in particular, and then check if it is certified, maintained, and whether personnel are trained for its use.

These methods should be used in combination and/or applied individually at the Auditor’s discretion.

Each audit check point shall be based on verifiable facts. It is recommended that the Auditor identify a piece of audit evidence (certificates, reports, photos etc.) related to each point. When an area of non-compliance is observed, the evidence should be mentioned into the Audit Report.

3.2.3 AUDIT AND INSPECTION GRID

A standard Audit grid will be developed for Regulatory Audits of the OSH O&G Regulation, so that it may serve as a general guide to Audit activities. This grid, together with the scoring matrix, will be used to determine how well the Occupier is doing in terms of implementing its safety case and complying with the OSH O&G Regulations.

The process of developing this guide will require for nominated officers of the Enforcer to gather together to review the OSH O&G Regulation in order to identify a checklist of questions that need to be answered during an Audit. The officers will also determine the points of operation and management systems that should be assessed for each of the Regulations.

As an example, Regulation 9 stipulates that all Occupiers “shall prepare a safety case in respect of that facility and submit it to the Director’s approval”. In order to establish compliance, an Auditor may ask the following questions:
- Has the Occupier prepared a safety case in respect of the facility?
- Has this safety case been submitted to the Director?
- Has the Director approved this safety case?

This process should be carried out for all relevant topics covered in the OSH O&G Regulations and would lead to a grid containing questions addressing the entire scope of the regulation:

<table>
<thead>
<tr>
<th>Regulation</th>
<th>Assessment Question</th>
<th>Evidence Provided</th>
<th>Score</th>
<th>Weight</th>
<th>Weighted Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>Has the Occupier prepared a safety case in respect of the facility?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Has this safety case been submitted to the Director?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Has the Director approved the safety case?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Figure 3: Illustrative Section of Audit and Inspection Grid*

Ideally, the Audit and Inspection Grid should contain an answer for each of the questions, and the Auditor should attribute a score based on that answer according to a standardized scoring system that needs to be developed by the Enforcer and improved over time once applied in real circumstances.

Each answer should be supported by tangible evidence. Evidence may include reports (investigation reports, daily/monthly/yearly reports etc…) or any other form of data produced by the Occupier such as operational statistics, contracts, photos or second hand information such as interviews.

A binary scoring approach is preferred with a positive assessment leading to a score of “1” and a negative assessment leading to a score of “0”. Sometimes further granularity will be required but should be limited to very specific cases and such scoring needs to be defined very precisely.

Below is an example of a scoring matrix where scores are defined to avoid too much subjectivity:

<table>
<thead>
<tr>
<th>Score</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>The Occupier has not met the minimal compliance requirements set out by the Regulation.</td>
</tr>
<tr>
<td>1</td>
<td>The Occupier meets the minimal compliance requirements set out by the Regulation but could improve performance substantially to reach commonly accepted industry standards.</td>
</tr>
<tr>
<td>2</td>
<td>The Occupier is compliant with the requirements set out by the Regulation and meets commonly accepted industry standards.</td>
</tr>
</tbody>
</table>
The Occupier is fully compliant with the requirements set out by the Regulation and is setting the standard for best practices.

Table 6: Binary Scoring Approach for Audit and Inspection Grid

It should be noted that there are 114 Regulations in the OSH O&G Regulations, with several of these Regulations containing multiple sub-sections. This means that the along with developing the checklist of items for assessment and related questions, the officers working on the Audit and Inspection grid will have to undertake a prioritization exercise.

This prioritization process will be key to ensuring the effectiveness of the Audit and Inspection Grid as it will allow the Auditor to focus on higher priority areas. The Enforcer’s vision should be the starting point for establishing priority audit areas. Such a vision may be articulated in a simple statement such as “DOSHS’ vision is to ensure that there are 0 Accidents in the Kenyan O&G Industry.” In order to meet the requirements of this vision, therefore, DOSHS must identify Priority Areas that need to be carefully monitored in order to achieve this vision.

Priorities may be rooted in objectives set by the political or administrative authorities, as well as in data. For instance, referring to available accident data in Kenya and in the O&G industry generally, DOSHS might want to focus on areas experiencing a high incidence of accidents. Drilling is one of the most hazardous O&G activities worldwide, and this may be an area of the regulation to focus on as the country ramps up drilling activity. Another area that may warrant special attention is tanker safety, which has been found to be the source of many fatalities in Kenya in particular.

The Enforcer may also wish to define outcome targets. As an example, it may want to halve tanker accidents in a given year. Analyzing lessons learned reports from tanker accidents may yield specific conclusions that allow for more targeted and effective auditing. These accident reports may inform the Enforcer that tanker drivers are not properly licensed, or trucks are not regularly maintained, or key equipment is improperly certified. This may yield further outcome targets such as ensuring 100% compliance with licensing requirements or third-party equipment certification.

This tiered approach may help focus the Enforcer’s attention during Audits.

Figure 4: Methodology for Defining Audit and Inspection Priority Areas

It can be complicated to objectively determine priority areas, as such it may be useful to develop a prioritization framework to establish a systematic approach to the auditing process. This starts with agreeing on a set of criteria that will be used to evaluate the importance of a specific safety issue addressed in each Regulation.
Below you will find an example of a prioritization framework that may be adopted by the Enforcer to rate the relative importance of specific safety issues that Auditors may audit:

**Figure 5: Prioritization Framework (Illustrative)**

Once the Enforcer has set its prioritization criteria, the nominated officers working on the Audit and Inspection Grid may then proceed to establish a rating matrix. This rating matrix should be applied to the priority as follows:

**Figure 6: Priority Areas Rating Matrix**

This rating matrix can subsequently be applied to each item on the inspection checklist in order to establish the Weight and therefore relative importance of a particular item.
ITEMS IN THE INSPECTION GRID
Weighted Scoring

<table>
<thead>
<tr>
<th>Audit Item</th>
<th>Impact</th>
<th>Viability</th>
<th>Sustainability</th>
<th>Total Score</th>
<th>Weighted Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Item 1</td>
<td>1-5</td>
<td>1-5</td>
<td>1-5</td>
<td>(3-15) / 3</td>
<td></td>
</tr>
<tr>
<td>Item 2</td>
<td>1-5</td>
<td>1-5</td>
<td>1-5</td>
<td>(3-15) / 3</td>
<td></td>
</tr>
<tr>
<td>Item 3</td>
<td>1-5</td>
<td>1-5</td>
<td>1-5</td>
<td>(3-15) / 3</td>
<td></td>
</tr>
<tr>
<td>Item 4</td>
<td>1-5</td>
<td>1-5</td>
<td>1-5</td>
<td>(3-15) / 3</td>
<td></td>
</tr>
<tr>
<td>Item 6</td>
<td>1-5</td>
<td>1-5</td>
<td>1-5</td>
<td>(3-15) / 3</td>
<td></td>
</tr>
</tbody>
</table>

Figure 7: Illustrative Application of Rating Matrix to Items in the Audit and Inspection Grid

The output of this exercise will be inputted in the Audit and Inspection Grid on the column marked “Weight.”

<table>
<thead>
<tr>
<th>Regulation</th>
<th>Assessment Question</th>
<th>Assessment</th>
<th>Score</th>
<th>Weight</th>
<th>Weighted Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>Has the Occupier prepared a safety case in respect of the facility?</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Has the Director approved the safety case?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Figure 8: Placement of Calculated Weight for Items in the Audit and Inspection Grid

In the end, the weighted score of items in the Audit and Inspection Grid will then be calculated as the assessed score multiplied by the items weight.

The template for the Audit and Inspection Grid will be provided following the Enforcer capacity building training session on the draft OSH Audit and Inspection Guidelines.

- **Note 1**: In all cases, this guide should be reviewed regularly to ensure that it is meeting the goals of the audit process including field inspection.
- **Note 2**: Although the Audit and Inspection Grid summarizes the key issues to be assessed in an audit, it is recommended that the Auditor does not question the Auditee by strictly following the order or scope of such an audit or inspection checklist. Such an approach would complicate sampling and tracking OSH systems and lower the quality of the exchanges that can be instituted by the Auditor with an Auditee. Auditors should exercise judgement based on their analysis and experience to determine what issues to focus on. In this view, the Audit grid will be completed as required after the audit.

### 3.2.4 SITE INSPECTION

The Site Inspection aims to control the actual implementation and the effectiveness of OSH systems in practice at the Occupier’s workplace. This Site Inspection is conducted by applying the following methods:

- **Interviews with supervisors** so as to assess how the OSH Management Systems presented in the first part of the Audit are translated in actual operations. Several Supervisors should be interviewed in order to exhaustively assess the Occupier’s OSH systems, and allow the Auditor to appraise the Supervisors’ level of OSH knowledge.
- **Interviews with workers** so as to evaluate how OSH systems are understood and implemented by them. These interviews should also serve to assess whether these workers understand the risks they face on their workplace and the safety precautions they should implement to minimize their exposure to those risks.
- **Check available documentation on site.** The Auditor should consult any documentation found at the workplace, to examine the pertinence and the accuracy of the information given. Documents that should be found and reviewed can include, but are not limited to, permit to work forms, risk assessment forms, and any other document used to manage OSH on site.
- **Equipment Observation.** The Auditor should control the certification, the maintenance performed and the overall condition of equipment (such as but not limited to pressurized vessels; lifting equipment; electrical equipment used in explosive atmospheres, identified zonage; or equipment used for the storage of hazardous substances) and cross-check the results with the Occupier equipment register.
- **Observation of operations.** The Auditor should observe the ongoing operations and assess if they are undertaken as per best industry practices. The Auditor should assess whether sub-contractors are properly supervised, if OSH signs are in place, and all other issues critical to appropriate OSH practices (NOTE: ideally, the Occupier has communicated to the Auditor the applicable standard operating procedures, otherwise, this would also be subject to minimal cross checking by the Enforcer)

These methods are used in combination and/or applied individually at the Auditor’s discretion.

Each item on the Audit checklist should be assessed on the basis of verifiable facts. It is recommended that the Auditor identify any and all evidence (certificates, reports, photos etc.) related to each item. When areas of non-compliance are observed, the evidence should be mentioned in the Audit report.
3.2.5 REVIEW OF AUDIT OBSERVATIONS
In some cases, the Auditor may need to do a second review or double check observations and conclusions that result from an interview, an examination of a document or an observation to ensure that any identified areas of non-compliance are truly valid.

The purpose of double checking is to confirm that the Auditor's assessment accurately reflects the Occupier's level of compliance. The Auditor should review the information obtained during the audit (such as the adequacy of worker training, personnel compliance with a procedure, proper incident reporting etc.) before issuing an assessment of non-compliance. If adequate documentation or evidence cannot be provided within the Audit timeframe, the Auditee should be informed that non-compliance has been observed.

3.2.6 ADDRESSING NON-COMPLIANCE
When an area of non-compliance with the OSH Regulation has been identified by the Auditor, the Auditor should immediately inform the Auditee and take steps for both parties to take note of the violation of the related OSH Regulation. The Auditee should be provided with an opportunity to clarify and respond.

It remains the Auditor's duty to confirm/double-check the observation made and decide whether or not the activities shall be seized (in application of Regulation 35 of the OSH Act).

Any area of non-compliance shall be factual and formally addressed with the Occupier during the Close-Out Meeting, and only once the Auditor has double-checked the evidence.

Non-compliance shall be followed up with the issuance of an Enforcement Notice, which may come in one of two forms:

- **A Prohibition Notice:**
  In accordance with the application of Regulation 37 of the OSH Act, a Prohibition Notice is issued when an Auditor considers that there is risk of serious personal injury resulting from an improper application of OSH standards, systems or procedures.

  The Prohibition Notice should contain relevant legal information, clearly identify which Regulation has been violated, and note how the Occupier is in breach of the concerned regulation. **APPENDIX 4: IMPROVEMENT NOTICE** provides a template of the form that should be used.

  In such a case, the Occupier must not resume the activity that is a subject of the Prohibition Notice until it has taken the necessary corrective actions required to remove or control the risk. As provided in the OSH O&G Regulations, if the Occupier does not comply with the Prohibition Notice, the Occupier is liable to prosecution.

- **An Improvement Notice:**
  In accordance with Regulation 36 of the OSH Act, an Improvement Notice is issued when an Auditor observes a breach of law but does not consider that this breach poses serious risk of personal injury.
The Improvement Notice should contain relevant legal information, clearly identify which Regulation has been violated, and how the Occupier is in breach of the concerned regulation.

Improvement Notices aim to rectify illegal health and safety situations in order to ensure immediate improvement by the Occupier.

The template for issuing Improvement Notices is provided in APPENDIX 4: IMPROVEMENT NOTICE.

The below table represents a range of non-compliance examples, and their degree of severity.

<table>
<thead>
<tr>
<th>Degree of non-compliance</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major (Prohibition notice)</td>
<td>- Occupier contravenes to safety case regulations (no safety case has been prepared, neither submitted to DOSHS, or Operations have commenced despite having the safety case rejected by the Enforcer)</td>
</tr>
<tr>
<td></td>
<td>- Absence of risk management system and lack of risk assessment</td>
</tr>
<tr>
<td></td>
<td>- Absence of OSH Management System</td>
</tr>
<tr>
<td></td>
<td>- Lack of emergency preparedness</td>
</tr>
<tr>
<td></td>
<td>- Personnel un-trained, and found to be incompetent to conduct hazardous activities</td>
</tr>
<tr>
<td></td>
<td>- Equipment used is not properly certified and unsafe to operate</td>
</tr>
<tr>
<td></td>
<td>- Absence of standard operating procedures</td>
</tr>
<tr>
<td></td>
<td>- Inadequate risk assessment methodology, one which would not allow the identification of major risks</td>
</tr>
<tr>
<td></td>
<td>- Inadequate inspection process and monitoring of facility</td>
</tr>
<tr>
<td></td>
<td>- Incidents are not reported to DOSHS</td>
</tr>
<tr>
<td></td>
<td>- Lack of regulatory register</td>
</tr>
<tr>
<td></td>
<td>- Inadequate program to implement occupier OSH policy;</td>
</tr>
</tbody>
</table>

Table 7: Examples of Non-Compliance and Degree of Severity

3.2.7 AUDIT CLOSE-OUT MEETING
At the end of the Audit process, a Close-Out Meeting should be held by the Auditor in order to debrief the Auditee on the Audit’s major findings. Prior to, and in order to prepare for, the Close-Out Meeting, the Auditor should take some time on his/her own (+/-30mn) to:

- review the information collected during the Audit and confirm that the Audit objectives and scope have been met.
- establish all areas of non-compliance which have been observed. The Auditor shall assess their importance and prepare appropriate Enforcement Notices as necessary.
- Identify recommendations to be included in the Enforcement Notices to assist the Auditee in the regulatory compliance process.
- Maintain a positive approach towards the Auditee and always emphasize the good practices and strengths which have emerged from the Audit.

Once the Close-Out Meeting is prepared, the Auditor should invite the Occupier’s management and all personnel responsible for the functions or processes which have been audited.

The Close-Out Meeting should be a structured presentation of the Audit findings and should be viewed as an opportunity to introduce the “post-audit” issues that will need to be addressed.

The following should be explained to the Auditee during the Close-Out Meeting:

- Overview of Occupier’s OSH systems that were audited;
- Good practices and OSH strengths which were identified and/or observed during the audit;
- Presentation of the major Audit findings and an explanation of Enforcement Notices that will be issued, as case may be.
  o Enforcement Notices should be explained in such a manner that they are understood and acknowledged by the Auditee’s management. This step results in officially issuing the relevant notice (prohibition or improvement), dated and signed by both Auditor and Auditee. The Auditor shall keep a copy of the signed notice(s).
- Related post-audit activities (e.g. implementation of corrective actions, audit complaint handling, appeals process):
  o the remedial action plan to be developed and submitted to the Auditor, within an agreed timeframe;
  o the process of Audit findings handling;
  o the appeals process available to the Auditee; and
  o the prosecution process if Occupier does not comply with the notices.

Any divergent opinion regarding the Audit findings or conclusions between the Auditor and the Auditee should be discussed and, if possible, resolved. If such divergence is not resolved, this should be recorded and made part of the report.

3.2.8 INCOMPLETE AUDITS

In some cases, the Auditor may not be able to meet the Audit’s scope and may not complete the Audit Plan.

In some cases, there may be some situations that may make it difficult to effectively conduct of an Audit. Such situations may include:

- Unavailability of interviewees identified in the Audit Plan;
- Restricted, or lack of access, to Occupier sites making observation of activities impossible or difficult;
- Lack of access to Occupier digital documentation, or software database (e.g. in case of a shutdown of the server/web provider, etc.); and/or
- Major ongoing operations which would mobilize the whole Occupier workforce thereby making them unavailable for audit activities.
In such instances, the Auditor will need to determine the appropriate course of action. Some of the appropriate responses may include the modification of the Audit Plan, changes to the Audit scope, extension of the Audit duration, or termination and/or rescheduling of the Audit.

3.3 POST AUDIT ACTIVITIES

3.3.1 AUDIT REPORT
The Auditor should compile observations, findings, and recommendations into a written report after completing the audit activities.

3.3.1.1 ISSUANCE DEADLINES
The Audit Report should be issued within 30 days of Audit completion and distributed as below.

3.3.1.2 CONTENT
The Audit report should provide a complete, accurate, concise and clear record of the Audit, with distinctions between legal requirements and best practices.

An Audit report should include the following:

- Identification of the Audit type, the Auditor and the Auditee
- The Auditee’s general information, to provide an understanding of activities, types of operation, workforce, and all other relevant Occupier information
- The record of personnel interviewed
- The Audit’s general findings, as it relates to the OSH O&G Regulation
- The specific findings, as they relate to Prohibition and Improvement Notices. This section shall be properly filled in, referring the breaches to a specific OSH Regulation, defining the nature of the breach and the related risks. It is important to note that this section may be used in court, if and when appeals or prosecutions are undertaken.
- The Audit’s conclusions

An Audit Report Template is provided in APPENDIX 5: AUDIT REPORT TEMPLATE.

3.3.1.3 DISTRIBUTION
All Enforcement Notices should be shared with the Petroleum Occupational Safety and Health Advisory Committee as soon as they are issued to Occupiers. It is vitally important that all members of POSHAC are aware of such breaches to ensure that they are aware of major OSH trends in the country. Such data is useful for inter-agency coordination and to enable better and more targeted reviews of Safety Cases.

The Audit Report should be prepared and signed by the Auditor and submitted to the Occupier within the above-mentioned issuance deadlines.

The Audit Report should also be shared with other POSHAC member agencies for the purposes of proper coordination. A copy of the final Audit Report should be addressed to the DOSHS head office.
DOSH should file the reports received and share copies as required to any Auditor having to perform additional Regulatory Audit (within the county where occupier is located or from other counties).

In all cases, the information contained in Audit Reports should remain confidential and should be distributed only to authorized personnel. Such authorizations should be determined by DOSHS by way on written internal policy. It may also be advised to have all Auditors sign a confidentiality agreement covering all Regulatory Audits.

3.3.2 FOLLOW-UP ON ENFORCER NOTICES

As a follow-up to any Enforcement Notice issued, Auditees shall return in writing an associated remedial action plan to the Auditor within 21 days from the notice’s date of issue.

It remains the Enforcer's duty to monitor and follow-up on Enforcement Notices issued by the Auditor to the Occupier and to:
- Assess the Occupier’s proposed corrective actions to ensure compliance with the law
- Tracking Occupier’s implementation of corrective actions until their closure

When the Auditor has received sufficient evidence to prove that the contents of the Enforcement Notices have been resolved, he/she informs the Occupier in writing.

3.3.3 DEBRIEFING DOSHS AND/OR POSHAC

Under certain circumstances, the Auditor may be required to report the Audit findings to DOSHS and/or POSHAC and debrief their members under one or several of the following circumstances:
- An important event occurred prior to or post-audit, such as fatality, explosion, etc.
- Occupier has been found to have very poor overall OSH performance
- Other Occupier sites/entities/subsidiaries present high OSH concerns and risks
- Occupier appeals notices issued by the Auditor and/or puts into question the Auditor’s professionalism
- Specific OSH issues that may influence evolutions in the regulatory, licensing or permitting processes
- Upon issuance of an official request from DOSHS or POSHAC
3.3.4 PROSECUTION AND APPEAL

The Audit Report can be used by the Enforcer to ensure Occupier accountability in case of persistent non-compliance.

Prosecution can be carried out by the Enforcer; however, the Auditor can only recommend prosecution if there is enough evidence and if such prosecution is in the workforce and/or public interest.

Prosecution is more likely and will normally follow in cases where:

- A fatality has occurred due to a breach of law
- Occupier is responsible for an offence or injury which is serious in nature and breadth
- Occupier has persistently displayed poor compliance
- Work has been carried out without a license where one is needed, or in breach of the terms of that license
- Work has been carried out without a safety case where one is needed, or fails to follow the processes set out in a safety case
- Safety management standards fall well below industry expectations and causes significant risk to interested parties
- Failure to comply with an Improvement Notice or Prohibition Notice has been recorded
- Occupier has displayed an intent to deceive in relation to a matter which gives rise to significant risk to interested parties
- Inspectors have been intentionally obstructed in the course of their duties
4 SIGN-OFF

I confirm that the contents of this Audit and Inspection Guidelines Report are in accordance with my understanding of the scope of the Project and will meet the stated requirements of the Client.

Sign-off from the Client is required within one week of the issuance of this report after one turn of collated comments. Delays in sign-off will not be an impediment to payment of fees.

AEGIDE Representative:
Name: 
Signature: 
Date: 
Witness
Name: 
Signature: 
Date: 
Client Representative:
Name: 
Signature: 
Date: 
Witness
Name: 
Signature: 
Date:
5 APPENDICES

APPENDIX 1: NOTICE OF AUDIT VISIT AND OFFICIAL DOCUMENT REQUEST
APPENDIX 2: AUDIT PLAN TEMPLATE
APPENDIX 3: PROHIBITION NOTICE
APPENDIX 4: IMPROVEMENT NOTICE
APPENDIX 5: AUDIT REPORT TEMPLATE
APPENDIX 1: NOTICE OF AUDIT VISIT AND REQUEST FOR DOCUMENTATION

MINISTRY OF LABOUR AND SOCIAL PROTECTION
DIRECTORATE OF OCCUPATIONAL HEALTH AND SAFETY SERVICES

M/S: ..................................................
Address: ...........................................
Phone: .............................................

Dear Sirs,

**RE: NOTICE OF AUDIT AND INSPECTION VISIT**

Pursuant to the provisions of the Occupational Health and Safety Act, 2007 and the Occupational Health and Safety (Oil & Gas) Regulations 2019 (“OSH O&G Regulations”), you are hereby notified that your company will soon be undergoing a Regulatory Occupational Safety and Health (OSH) Audit.

Our Auditors will be visiting your premises to review your compliance with the OSH O&G Regulations. In anticipation of this Audit, you are required to provide the Occupational Safety & Health officer in charge of this exercise: .......... (**NAME OF OFFICER**) the following OSH documentation:

- Your up-to-date Corporate OSH documentation
- Your company organization chart
- Your up-to-date risk register(s)
- Your up-to-date equipment register(s)
- Your up-to-date training register(s)
- Your up-to-date incident register(s)
- Your up-to-date OSH action plan(s)

Further documentation may be requested as required by your assigned OSH Officer.

Yours faithfully,

....................... (**NAME OF OFFICER**)  
**FOR: COUNTY OCCUPATIONAL SAFETY AND HEALTH OFFICER**

**CC:**
The Director of Occupational Safety and Health Services,  
P.O. Box 34120, Nairobi.
APPENDIX 2: AUDIT PLAN TEMPLATE
MINISTRY OF LABOUR AND SOCIAL PROTECTION
DIRECTORATE OF OCCUPATIONAL HEALTH AND SAFETY SERVICES

AUDIT PLAN

This document is provided to you by the Directorate of Occupation Safety and Health Services (DOSHS) in preparation for your upcoming Regulatory Audit. We strongly urge you to review this information and to take into consideration the scheduled audit timelines, prepare for stated interviews, and gather the requested documents in order to facilitate the Auditor’s work.

Please be informed that you are required to ensure unfettered access to your facilities to our Auditor(s) so that they may carry out their task in the most objective, comprehensive and effective manner. You are also requested to facilitate safety & health induction courses for the Auditors, as required.

<table>
<thead>
<tr>
<th>GENERAL INFORMATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Audit Type:</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Name of Auditor(s)</td>
</tr>
<tr>
<td>Auditor(s) Contact Details</td>
</tr>
<tr>
<td>Name of Occupier</td>
</tr>
<tr>
<td>OSH Registration Number</td>
</tr>
<tr>
<td>Occupier Representative</td>
</tr>
<tr>
<td>Audit Date(s)</td>
</tr>
<tr>
<td>Audit Duration</td>
</tr>
<tr>
<td>Activities Audited</td>
</tr>
<tr>
<td>Location / Site</td>
</tr>
</tbody>
</table>
The following OSH documentation may be requested by Auditor(s) during the course of the Audit:

- Up-to-date Corporate OSH documentation
- Company organization chart
- Up-to-date risk register(s)
- Up-to-date equipment register(s)
- Up-to-date training register(s)
- Up-to-date incident register(s)
  Up-to-date OSH action plan(s)
- Incident reports
- Inspection reports
- Drills & exercise reports
- Personnel records
- Maintenance records
- Equipment certification records
- Personnel authorization records

Please keep copies of these documents accessible and available during the course of the Audit.

The following key personnel shall be available for one-to-one interviews with Auditor(s):

- Chief Executive Officer (CEO)
- Occupational Safety and Health (OSH) Manager
- Production Manager
- Human Resource Manager
- Maintenance Manager
## Audit Plan

<table>
<thead>
<tr>
<th>Time</th>
<th>Duration</th>
<th>Step</th>
<th>Objectives</th>
<th>People to meet</th>
<th>Location / Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>8h30</td>
<td>30 minutes</td>
<td>Audit Kick-Off Meeting</td>
<td>The Auditor kicks-off the Audit presents the Audit process and methodology</td>
<td>Occupier Management Team</td>
<td></td>
</tr>
<tr>
<td>9h00</td>
<td>3 and ½ hours</td>
<td>OSH Management System audit</td>
<td>The Auditor reviews and assesses the OSH Management System developed and implemented</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12h30</td>
<td>1 and ½ hours</td>
<td>Lunch break</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14h00</td>
<td>2 and ½ hours</td>
<td>Interviews with managers</td>
<td>The Auditor conducts interviews with key actors of the corporate OSH system.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>16h30</td>
<td>30 minutes</td>
<td>Cross checking</td>
<td>The Auditor makes a cross checking between interviews, evidences shown and management system.</td>
<td>Auditor</td>
<td></td>
</tr>
<tr>
<td>17h00</td>
<td>30 minutes</td>
<td>Audit Closing</td>
<td>Debriefing meeting is held between the Auditor and the entity’s Management to present “on-the-spot” findings.</td>
<td>Entity’s management</td>
<td></td>
</tr>
<tr>
<td>Hour</td>
<td>Duration</td>
<td>Step</td>
<td>Objectives</td>
<td>People to meet</td>
<td>Location / Site</td>
</tr>
<tr>
<td>------</td>
<td>----------------</td>
<td>---------------------------</td>
<td>-----------------------------------------------------------------------------</td>
<td>----------------------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>8h30</td>
<td>30 minutes</td>
<td>Opening Audit Meeting</td>
<td>The Auditor presents the process site inspection</td>
<td>Entity's management</td>
<td></td>
</tr>
<tr>
<td>9h00</td>
<td>3 and ½ hours</td>
<td>Site inspection</td>
<td>The Auditor visits activities and/or field of the auditee.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12h30</td>
<td>1 and ½ hours</td>
<td>Lunch break</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14h00</td>
<td>2 and ½ hours</td>
<td>Site inspection</td>
<td>The Auditor visits activities and/or field of the auditee.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>16h30</td>
<td>30 minutes</td>
<td>Double checking</td>
<td>The Auditor cross checks field observation against the management system.</td>
<td>Auditor</td>
<td></td>
</tr>
<tr>
<td>17h00</td>
<td>30 minutes</td>
<td>Audit Close-Out</td>
<td>Close-Out Meeting is held between the Auditor and Auditee.</td>
<td>Entity's management</td>
<td></td>
</tr>
</tbody>
</table>

…………………… (NAME OF OFFICER)

FOR: COUNTY OCCUPATIONAL SAFETY AND HEALTH OFFICER

CC: Director, Directorate of Occupational Safety and Health Services
APPENDIX 3: PROHIBITION NOTICE

MINISTRY OF LABOUR AND SOCIAL PROTECTION
DIRECTORATE OF OCCUPATIONAL HEATH AND SAFETY SERVICES

M/S: ………………………………………
Address: ………………………………………
Phone: ………………………………………

Dear Sirs,

PROHIBITION NOTICE NO. XXXXX/XXXX
OCCUPATIONAL SAFETY AND HEALTH ACT 2007

The inspection of your workplace on … (ADDRESS OF REGISTERED WORK PLACE) by … (NAME OF OFFICER) and undersigned on … day of … (MONTH AND YEAR), refers. You are required to avail the following documents (LIST DOCUMENTS REQUIRED):
…………………………………………………………………………………………………………………………
…………………………………………………………………………………………………………………………
…………………………………………………………………………………………………………………………

In addition to the above, and under powers conferred upon me under Section 37 of Occupational Safety and Health Act 2007, I hereby PROHIBIT operations connected with (LIST PROHIBITED ACTIVITIES):
…………………………………………………………………………………………………………………………
…………………………………………………………………………………………………………………………
…………………………………………………………………………………………………………………………

REASONS FOR PROHIBITION
Which contravenes (QUOTE THE SECTION OF OSHA AND OSH O&G REGULATIONS)
…………………………………………………………………………………………………………………………
…………………………………………………………………………………………………………………………
…………………………………………………………………………………………………………………………

When the prohibition notice is in force, all workers will continue earning their wages and benefits as prescribed by Section 37[7] of the Occupational Safety and Health Act 2007.

Note that after compliance with the requirements, work should only start after an Occupational Health and Safety Officer has verified and is satisfied that the said Rules have been complied with failure to which further legal action shall be taken without any reference to you.

Name of officer serving the notice: …. (NAME OF OFFICER)

Designation: OCCUPATIONAL HEATH AND SAFETY OFFICER

Signature………………………… Date…………………………

APPROVED BY

Name ……. (NAME OF APPROVING OFFICER)

Designation ……………………………………………………..

Signature………………………… Date…………………………
SERVICE OF NOTICE
The Notice is served in accordance with section 118 of the Occupational Safety and Health Act 2007.

Received By:

<table>
<thead>
<tr>
<th>Name</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

NB: Since the person to whom this Notice was addressed refused to receive it, the notice was pinned at the door of the office/ was left in the office/posted by registered mail.

<table>
<thead>
<tr>
<th>Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

CC:
The Director of Occupational Health and Safety Services,
P.O. Box 34120, Nairobi.
APPENDIX 4: IMPROVEMENT NOTICE

MINISTRY OF LABOUR AND SOCIAL PROTECTION
DIRECTORATE OF OCCUPATIONAL HEALTH AND SAFETY SERVICES

M/S: ......................................................
Address: ..............................................
Phone: ...................................................

Dear Sirs,

IMPROVEMENT NOTICE NO. XXXXX/XXXX
OCCUPATIONAL SAFETY AND HEALTH ACT 2007

Further to the recent inspection visit on .... (ADDRESS OF REGISTERED WORK PLACE) by ... (NAME OF OFFICER) and undersigned on ... day of .... (MONTH AND YEAR), I confirm the following matters require your immediate attention (LIST ALL AREAS OF IMPROVEMENT):

............................................................................................................................................................................................
............................................................................................................................................................................................
............................................................................................................................................................................................

You are therefore given XXXXX DAYS from the date of this letter to comply.

Expedite soonest possible. Thank you.

Yours faithfully,

........................................... (NAME OF OFFICER)
FOR: COUNTY OCCUPATIONAL SAFETY AND HEALTH OFFICER

CC:
The Director of Occupational Health and Safety Services,
P.O. Box 34120, Nairobi.
APPENDIX 5: AUDIT REPORT TEMPLATE

MINISTRY OF LABOUR AND SOCIAL PROTECTION
DIRECTORATE OF OCCUPATIONAL HEALTH AND SAFETY SERVICES

AUDIT REPORT

<table>
<thead>
<tr>
<th>Audit Type:</th>
<th>☐ Initial Audit</th>
<th>☐ Partial Audit</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>☐ Site Inspection</td>
<td>☐ Full periodic Audit</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name of Auditor(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Auditor(s) contact details</th>
<th>Cell phone:</th>
<th>Email:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name of occupier</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>OSH Registration number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Occupier responsible person</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Audit Date(s)</th>
</tr>
</thead>
<tbody>
<tr>
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</table>

<table>
<thead>
<tr>
<th>Audit duration</th>
</tr>
</thead>
<tbody>
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<td></td>
</tr>
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</table>

<table>
<thead>
<tr>
<th>Activities audited</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Location / Site</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

This report is prepared under the authority of DOSHS. Information included in this report are strictly confidential.
### GENERAL INFORMATION

<table>
<thead>
<tr>
<th>Sector</th>
<th>Upstream</th>
<th>Midstream</th>
<th>Downstream</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Location</th>
<th>Onshore</th>
<th>Offshore</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Number of employees</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Overall site turnover</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Previous audit findings</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lost time injury frequency</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of subcontractors</td>
<td></td>
<td></td>
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<tr>
<td>Type of subcontracted activities</td>
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### PERSONNEL INTERVIEWED

<table>
<thead>
<tr>
<th>NAME</th>
<th>POSITION</th>
<th>KOM</th>
<th>MSA</th>
<th>SI</th>
<th>CM</th>
</tr>
</thead>
</table>

KOM: Kick-Off Meeting  
MSA: (OSH) Management System Audit  
SI: Site Inspection  
CM: Close-Out Meeting
### OVERALL AUDIT FINDINGS

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
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<tbody>
<tr>
<td>1</td>
<td>Safety case regulation</td>
</tr>
<tr>
<td>2</td>
<td>Risk management</td>
</tr>
<tr>
<td>3</td>
<td>OSH Management system</td>
</tr>
<tr>
<td>4</td>
<td>Preparation to emergency</td>
</tr>
<tr>
<td>5</td>
<td>Sector specificities</td>
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### SPECIFIC FINDINGS

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<th>Strengths &amp; best practices observed</th>
<th>Number of non-compliances</th>
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#### Prohibition Notice*

- **Premises/activities:**
- **Matter:**
- **Recommended actions:**

#### Improvement Notice*

- **Premises/activities:**
- **Matter:**
- **Recommended actions:**

* lines to be repeated for each notice issued to occupier

### ACTIONS REQUIRED

<table>
<thead>
<tr>
<th>Action 01*</th>
<th>Action details:</th>
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<tbody>
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* lines to be repeated for each notice issued to occupier
<table>
<thead>
<tr>
<th>AUDIT CONCLUSIONS</th>
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<tbody>
<tr>
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</table>

**Auditor Name:**
**Date:**
**Signature:**