We have the policies — now what?

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Policies and procedures (P&P) — those words seem to always elicit an emotional response when associated with quality, health, safety and the environment (QHSE). A familiar outcry of, "Oh, no, not another one!" is generally the response. Nonetheless, P&P that is properly researched, thought out and constructed is an extremely valuable tool. It can properly educate those with less experience or none at all, to conduct business while adhering to company guidelines. P&P takes time and energy in order to get it right.

Companies that do not have professional resources are at a distinct disadvantage when it comes to P&P writing in general. The focus of this article is on the QHSE-type P&P, and my experience in working with companies that do not have comprehensive QHSE P&P in place. Simply put, you need P&P! Even if you never want to work for a "major" E&P company, you need P&P. It is simply good business. However, if you are in a hurry to meet a Master Service Agreement (MSA) and you need a whole bunch of P&P to "qualify," you can buy them, ready-made, guaranteed to get you a green-light 100 percent "A" rating, on some internal checklist or third-party database.

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This "canned" P&P phenomenon is a growing cottage-industry that is so rampant that there is not a day that that goes by without a telemarketer or e-mail blast from these folks that offer to solve all my P&P issues now and forever (for a fee). Okay, that is someone trying to make a buck. Caveat emptor, "Let the buyer beware."

With P&P in place, now what?

You conduct your business based upon those P&Ps. The review processes by certain third-party databases and similar services only verify you have all the words in the proper order, syntax and sentence structure. When a company posts these P&Ps, or puts them in the MSA or service quote return envelope, it now has an obligation to live by them — the company owns it — not only in the literal sense, but also by a financial and operational one. If you say you do something in a P&P, you have to actually do it and that can be a surprise to some.

How problems start

Once you state in a P&P that you will perform in a certain manner, you better be prepared for the follow-ups to failures of those P&Ps, usually in the form of actual practical audits by clients, investigations by OSHA, root cause analysis of incident investigations, lawsuits, etc. Those failures might hurt your people, damage property, your client's well/operations, cause environmental issues and absolutely will damage your reputation. So why put all of that on the line for a "canned" P&P without any due-diligence on your part?

Consider these steps to P&P success.

Step 1: Writing workable P&Ps. Let's get P&P done right the first time, before you post it or drop it in the envelope. What does that entail? First, whether you construct your P&P "off the shelf" from a third-party vendor or build it yourself internally, make sure the P&P will work for you in the real world of practical application. Mid-level managers and line personnel can help you there. They are the ones that literally have to live by the P&P. Take the "legal version" (my words) that cover the regulatory or database verbiage (usually the same thing) and really

LOOK at it. Can your employees make this P&P work as is? If not, modify the legal version to incorporate these workable solutions into the P&P. That is not an easy task, as it requires practical operational knowledge (your employees), and regulatory, and/or legal balance. Consider involving a QHSE professional and perhaps some legal expertise to ensure that the P&P covers all of the bases. Once that is done, get your senior management to approve and provide the resources to make the P&P a reality. Now everyone owns the P&P and because of the participation in writing the P&P, the employees especially own it and the eye-rolling generally stops when it is introduced in Step 2.

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Step 2: Training. If you develop any P&P, you have to train the affected people on the P&P. Adult learning/training has taken on a whole new "look and feel" over the years. Not that many years ago, you could have an employee sit down and watch a video, sign in on a training sheet and maybe even take a test to "verify" comprehension of the material. These elements are critical, but that is not all of it. My grandfather once told me that if you can repeat an instruction you are a parrot; if you can follow an instruction you are an average employee. If you can communicate the instruction to others in your own words and teach or show others, you are a great employee. We need to shoot for great employees. That will take some resources in time and money, but the return on this investment always pays dividends.

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Step 3: Practice. Maybe we could call this Policies, Procedures and Practice (P3) as this phase is critical. Do what you say you do in your P&P and don't forget about the PPE, equipment for confined space, personal dosimeters, etc. Don't pencil-whip the JSA or BBS cards or tailgate meetings. Have quality meetings, reports and documentation with real thought behind them used in the spirit for which they were designed — to produce a safe workplace as well as meet or exceed expectations of the regulators, our clients and most importantly, ourselves. Don't do it because you were told you had to in order to get a job. Do it because it is just good business, done right.

***ABOUT THE AUTHOR**: Eric Rosemann has over 35 years of experience in the petroleum industry in wireline operations and technical sales. A certified safety professional, he is the director of QHSE for Gray Wireline, a part of Archer.*