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### Quality, Health, Safety, Environmental & Energy Manual:

Document No: SM-65

#### Management of Change

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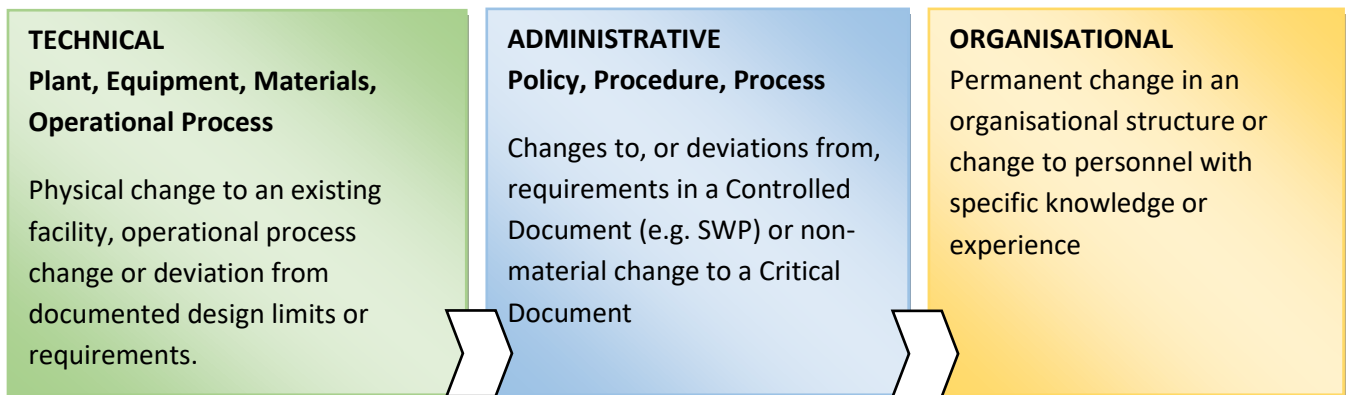
This procedure applies to any planned temporary and permanent change to Plant, Process, or People with the potential to impact safe, compliant and reliable operating activity and should be followed by anyone who is involved in the Management of Change (MOC) process for TMHUK including those functions where changes impact facilities or operating activities. To ensure MOC is completed consistently across TMHUK, local procedures should not be developed.

#### Purpose

- 1.0 Management of Change is about identifying potential hazards that a change can introduce, then assessing the risks associated with these hazards, and systematically addressing them.
- 1.1 Any change to plant, process or people could introduce risk. In addition, changes can have unintended or unsuspected consequences.
- 1.2 Ineffective Management of Change processes can result in:
  - Change management that focuses on the expected benefits without properly considering the possible risks;
  - A tendency to focus on technical change rather than all types of change e.g., organizational, materials and legal and regulatory requirements;
  - Failure to communicate changes to the people affected by the change;
  - Failure to update or revise key documents such as operating procedures; and
  - Failure to address all relevant aspects of a change.
- 1.3 Therefore, a formal process that is used to manage any change from conception through to implementation is essential to identifying foreseeable potential hazards and managing their risks.
- 1.4 The MOC process is not a way to capture or explore ideas. Before initiating an MOC the following activities should be completed.
  - Discussed it with the right people
  - An indication from them that it's feasible and that money and people are available to complete the change
  - Agreement from them that it should be progressed. This agreement must then be formally documented

### Types of MOCs

2.0 The MOC process consists of the following three types of changes:



### Roles and Responsibilities

3.0 Everyone involved in the MOC process is responsible for stopping the activity if they have concerns regarding the safety of the change being considered.

3.1 A MOC agreement/process may be documented in different forums, dependent upon the complexity of the change. These include but are not limited to:

- Hoshin
- Gant Chart
- Risk Assessment/Safe system of work
- Method Statement

#### 3.2 Key Supporting Roles

- The Depot Responsible person has overall responsibility for any Technical MOC for their facility. A project manager or team may be assigned to manage the project to completion.
- A Functional Leader or above has overall responsibility of any Organisational or Administrative MOC which falls within the scope of this procedure.
- A member of the QSE team is to be assigned on all MOC's to ensure that a MOC plan is in place and meets TMHUK, regulatory and any other requirements.

### Communication of Change

4.0 Each MOC shall include communication of changes to affected parties of the workforce. Affected parties are those individuals (TMHUK team members and contractor) who will have a role or responsibility or are otherwise impacted by the proposed change. The type of communication should be based on both the risk involved and the complexity of the change. The following guidelines should be considered:

- **Email Notification** – Use for awareness only. Should be considered when change is easily understood and has a low risk. If awareness is required, email should be attached to the documented MOC agreement as evidence.

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- **LMS Based Training/ Video Training** – Use for higher level training. Should be considered when change requires training for low risk activity. If knowledge is required, testing should be considered, and results recorded.
- **Instructor Lead Training** – Use for detailed training. Should be considered when change requires training responsible parties on high risk activity. Testing should be completed, and results recorded

### **Replacement in Kind (RIK)**

- 5.0 The MOC process is not used for “Replacement in Kind” activities. RIK means a technically “like for like” replacement where the replacement is in full conformance with approved specifications and will have no impact on the plant. This means that RIK changes use the same size, style, type, duty, and performance characteristics.
- 5.1 When considering whether a replacement is RIK, it is important that Initiators take environmental, energy performance and regulatory issues into consideration. A change may not be considered RIK if a new emissions permit is required or an existing one requires amendment as a result of the change. A risk assessment must be carried out to consider any potential issues. Contact the QSE Team if you have any questions

### **Records**

- 6.0 Monitoring is essential to make sure the MOC process is working as it should. The assigned leader is responsible for assuring that it is working properly.
- 6.1 All documented MOC agreement/process must be retained by the assigned leader for no less than 5 years.
- 6.2 The Quality, Safety and Environmental Manager will present an analysis of all active MOC’s at each Safety Council meeting.