

**Resources Safety and Health
Performance Accountability Framework
2017-18 Self-Assessment Supplementary Evidence
Report**

Petroleum and Gas Inspectorate

December 2018

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Summary

Resources Safety and Health Performance Accountability Framework

The Resources Safety and Health Performance Accountability Framework (the Framework) was established to assess our performance when interacting with industry stakeholders while carrying out our regulatory functions. It is intended to evaluate how we perform as a regulator and our level of engagement with stakeholders.

The Framework and self-assessment reporting is modelled on the established Commonwealth Regulator Performance Framework which comprises six outcome-based KPIs to communicate the expectations of regulator performance.

Framework self-assessment

Resources Safety and Health (RSH) carried out the first annual self-assessment of its inspectorates' performance against the Framework Key Performance Indicators (KPIs).

For the first self-assessment report, we have released details of specific activities undertaken in 2017-18 that demonstrate the KPIs on the department's website. Another key source of supporting evidence are the results of a 2018 RSH industry stakeholder survey.

The information contained in this report is by no means an exhaustive list of the activities undertaken by the Petroleum and Gas Inspectorate, but it captures the main elements of the work undertaken in 2017-18.

Future self-assessment reports will focus on significant initiatives and consultation activities, as well as significant continuous improvement initiatives, rather than repeating the material covered in the framework KPIs. We believe there is more value focusing on our significant performance efforts in future reports.

Summary of assessment

The self-assessment found RSH:

- is engaged with regulated industries, other regulatory agencies and academic and scientific institutions;
- is delivering against the KPIs and performance measures;
- effectively manages the balance between supporting industry through regular engagement and consultation and enforcing the legislation to achieve better safety and health outcomes.

Areas for improvement highlighted by the self-assessment include:

- improving understanding within industry of the risk-based approach RSH inspectorates take when monitoring compliance;
- improving our website to make it easier for our stakeholders to find the information and guidance material to assist them in their day-to-day operations.

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Petroleum and Gas Inspectorate 2017-18 supplementary activity-based evidence

KPI 1: RSH does not unnecessarily impede the operation of regulated entities

Stakeholder Survey1

PGI staff demonstrate an understanding of your operation

Correlated Performance Accountability Framework KPI's: KPI1, KPI6



Overall, how well do you feel that PGI performs in terms of being a proactive safety and health regulator (KPI 1)?



To what extent do you feel that PGI supports positive safety and health outcomes for your organisation (KPI 1)?



Delivery of functions - How well do you think PGI performs?

Correlated Performance Accountability Framework KPI's: KPI1, KPI4



¹ The stakeholder survey results represented in this document may not always equal 100 per cent as 'Unsure' or 'Not applicable' responses have not been included where the results were very small.

Raise awareness and promote safety and health outcomes - How well does PGI perform in the delivery of these functions?

Correlated Performance Accountability Framework KPI's: KPI 2



Did you access, download or receive any resources from Resources Safety and Health during the last 12 months? (Quality and ease of access)

Correlated Performance Accountability Framework KPI's: KPI1, KPI2



Industry Consultative Committees

- Petroleum and Gas Inspectorate Stakeholder Engagement Committee Upstream held three meetings.
- Petroleum and Gas Inspectorate Stakeholder Engagement Committee Downstream held three meetings.

Consultation and engagement activities

- Fourteen Gas Awareness Sessions for the gas work sector (work licence and authorisation holders) held over May and June 2018 throughout Queensland. These sessions provided updates on the Petroleum and Gas (Production and Safety) Act 2004 and regulation, Australian Standards and general industry updates including licensing, compliance expectations and new risk based approach.
- Drilling Contractors Safety Roundtable held in Toowoomba 16 March 2018 information sharing.
- Monthly Australian Petroleum Production & Exploration Association (APPEA) Health & Safety Officers meetings.
- Monthly APPEA Qld Policy Director meetings.
- Quarterly Queensland Gas Association meetings.
- Biogas Operators meeting held in Brisbane 11 May 2018 including other Queensland Government agencies on the Petroleum and Gas Inspectorate Biogas Discussion Paper.
- Safer Together Upstream Gas Industry Safety Forum held on 20 February 2018 with the Petroleum and Gas Inspectorate attending as guest observer.
- Participated in five Gas Energy Australia Queensland meetings (includes fuel gas delivery sector).

Conferences, seminars and workshops

- Chief Inspector of Petroleum and Gas attended the annual APPEA Conference in Adelaide 15-17 May 2018.

Academic and scientific institutions

Contracted services between the Petroleum and Gas Inspectorate and the Griffith University Safety Science Innovation Laboratory to provide training, workshops reference material and interviews with inspectors to assist in adopting a more positive approach to its regulatory tasks (Everyday Work Explorations).

Engagement with domestic and international safety and regulatory agencies

- Member of the national Gas Technical Regulators Committee with members drawn from Australia and New Zealand.
- Regular engagement with the Hazardous Industries and Chemical Branch in Workplace Health and Safety Queensland (agencies have co-regulation of some facilities).

Professional and technical committees

Petroleum and Gas Inspectors regularly participate in Australian Standards committees and other technical committees including:

- *AS5601 Gas Installation*
- *AS2885 Pipelines – Gas and Liquid Petroleum*
- Australian Pipelines and Gas Association Code of Practice Steering Committee and Technical Working Group.
- Annual Gas Technical Regulators Committee (includes technical and safety regulators from Australian States and Territories and New Zealand).

KPI 2: RSH communicates with regulated industries in a clear, targeted and effective manner

Stakeholder Survey

Raise awareness and promote safety and health outcomes - How well does PGI perform in the delivery of these functions?

Correlated Performance Accountability Framework KPI's: KPI 2



Information and Guidance Material - How well do you think PGI performs:-

Correlated Performance Accountability Framework KPI's: KPI2



Communication and Information - How well do you think PGI performs?

Correlated Performance Accountability Framework KPI's: KPI2, KPI5



Did you access, download or receive any resources from Resources Safety and Health during the last 12 months? (Quality and ease of access)

Correlated Performance Accountability Framework KPI's: KPI1, KPI2



Consistent communication

The following documentation is stored in the Petroleum and Gas Inspectorate's databases and is available to all staff to promote consistency in communication with stakeholders. These documents also form part of the induction process for new employees.

- Departmental communication procedures and style guides
- Departmental protocols and templates
- RSH Investigations Manual
- RSH Compliance Policy
- Business Administration Procedure
- Operational Activities Procedure
- Response Assessment Procedure
- Initial Response Procedure
- Gas Work Licence and Authorisation Procedure
- Statutory document templates

- Departmental templates.

Communication and information releases

- Regular releases of information to stakeholders through tailored emails and letters, Vision6 and social media posts.
- Petroleum and Gas Newsletter
- Website information and guidance material regularly reviewed and updated
- Email information release including a short video to all 6200 licensed gasfitters
- Gas Awareness Sessions and Stakeholder Engagement Committees.

Feedback received on quality and availability of information

The Petroleum and Gas Inspectorate did not receive any direct feedback from industry or the public on the quality and availability of information and guidance material on the website.

Stated response timeframes

The *Petroleum and Gas (Production and Safety) Act 2004* and the Petroleum and Gas (Safety) Regulation 2018 have response timeframe provisions.

RSH inspectorates also comply with departmental and ministerial response timeframes.

Procedural fairness and appeal mechanisms

There were no internal or external review applications received in 2017-18.

Petroleum and Gas (Production and Safety) Act 2004

Chapter 12 of this Act provides for internal review by the Minister, chief inspector or chief executive of certain decisions under the Act, including for example a decision about the grant of a gas work licence or authorisation or a decision to give a compliance direction.

Chapter 12 also provides for external review of certain decisions by QCAT, and for appeals against certain decisions to the District Court or Industrial Court.

KPI 3: Actions undertaken by RSH are proportionate to the regulatory risk being managed

Stakeholder Survey

Compliance activities and complaints processes - How well does PGI perform in the delivery of these functions?

Correlated Performance Accountability Framework KPI's: KPI 3



How well do you think PGI performs when working with industry to reduce the likelihood and consequence of serious incidents?

Correlated Performance Accountability Framework KPI's: KPI 3



Communication of expectations to regulated industries

- RSH Annual Leaders Briefing at Parliament House on 27 October 2018.
- Petroleum and Gas Inspectorate Stakeholder Engagement Committee Downstream 4 May 2018 meeting included a brief to industry on compliance focus for 2018-19 and Q&A information sheet provided.
- Gas Awareness Sessions covered compliance expectations including the new risk based approach being adopted in 2018-2019.
- Eight Safety Alerts and two Safety Information Bulletins published on the department's website.
- Petroleum and Gas Inspectorate Newsletter.
- Petroleum and Gas Inspectorate email and short video sent to all 6200 licensed gasfitters.
- Petroleum and Gas Inspectorate legislation and compliance webpage Legislation and compliance for petroleum and gas | Business Queensland

Risk approach and review mechanisms

- The new risk based approach for the Petroleum and Gas Inspectorate's regulatory activities (including risk profile) to downstream industry was developed in first half of 2018 with implementation underway in 2018-2019.
- Category assessment review is undertaken each financial year by Category Lead and recorded in Petroleum and Gas database. Category leads also assess risk for Petroleum and Gas fee purposes.
- Changing risk priorities are assessed through the annual Compliance Assurance Program which is developed each year and formally reviewed each quarter.

Recognition of alternative ways to come into compliance

Generally, direct communication between the inspectorate and the regulated entity allow for discussion on possible alternative ways to come into compliance with the legislation.

Regulated entities can also request an internal review of a compliance direction under Chapter 12 of the *Petroleum and Gas (Production and Safety) Act 2004*. This provides for internal review by the Minister, chief inspector or chief executive of certain decisions under the Act.

An internal review might result in a compliance direction being withdrawn if other options are available to achieve compliance with the legislation.

KPI 4: RSH compliance and monitoring approaches are streamlined and coordinated

Stakeholder survey

Delivery of functions - How well do you think PGI performs?

Correlated Performance Accountability Framework KPI's: KPI1, KPI4



Information sharing practices (external and internal)

- Memorandum of Understanding with the Office of Industrial Relations for the provision of regulatory cooperation and understanding of roles, responsibilities and obligations.
- Memorandum of Understanding with the Queensland Police Service for the provision of shared information and documentation concerning the investigation of fatalities, injuries or serious incidents.
- Director WHSQ Hazardous Industries and Chemicals Branch (HICB) attended Petroleum and Gas Inspectorate Quarterly Review meeting 2 February 2018
- Regular informing sharing and engagement with Queensland Fire and Emergency Services (gas emergencies/response)
- Limited engagement with the Queensland Police Service (warrant execution, investigations)
- The Petroleum and Gas Inspectorate has a range of safety educational resources and information available on the department's website www.business.qld.gov.au/industries/mining-energy-water/resources/safety-health/petroleum-gas/safety-education
- RSH inspectorates share information through the monthly Chief Inspectors meetings, the monthly RSH Leadership Group meeting, RSH Newsletter, regional meetings, joint compliance meetings and day-to-day engagement.

Coordinated inspections

- Four joint inspections conducted with the Explosives Inspectorate in relation to the Commonwealth Games.
- Four joint industry engagements with the Explosives Inspectorate in relation to the Commonwealth Games.
- Petroleum and Gas Inspectorate also conducted a number of joint inspections, engagements and visits with the following regulators:
 - Three joint audits with HICB, WHSQ
 - One joint investigation with WHSQ
 - Seven joint engagements with WHSQ including six Commonwealth Games related.

Complaints

There were a total of 171 complaints made to the inspectorate in 2017-18 ranging from complaints made to the Minister's Office and through the gas safety generic email gassafe@dnrme.qld.gov.au. Feedback on the outcome of a complaint is conveyed to the complainant through ministerial correspondence, site visits, email communication and phone.

The majority of complaints related to gas work and devices. Of these, there are no complaints still under investigation. Information received on complaints throughout the year is released in a handout to industry stakeholders at the Annual Leaders Briefing.

There were no complaints received from regulated industries about information requests.

Complaints are confidentially managed in accordance with the department's Complaints Management Policy.

KPI 5: RSH is open and transparent in its dealings with regulated entities

Stakeholder survey

Open, transparent and responsive in their dealings with industry (targeted survey question)



Practice transparent and fair decision-making (targeted survey question)



Performance - How well do you think PGI Inspectors perform?

Correlated Performance Accountability Framework KPI's: KPI 5



Communication and Information - How well do you think PGI performs?

Correlated Performance Accountability Framework KPI's: KPI2, KPI5



Publication and communication of reported incidents and compliance approaches

- RSH Compliance Policy is published on the department's website.
- The *Legislation and compliance for petroleum and gas* page on the department's website provides information on the legislation, codes and standards that apply to the industry www.business.qld.gov.au/industries/mining-energy-water/resources/safety-health/petroleum-gas/regulation
- The gas safety promotional campaigns page on the department's website provides information on gas safety incidents www.business.qld.gov.au/industries/mining-energy-water/resources/safety-health/petroleum-gas/safety-education/campaign

Regular engagement with stakeholders

Refer to responses in KPI 1 and KPI 6.

KPI 6: RSH actively contributes to the continuous improvement of regulatory frameworks

Stakeholder Survey

Consultation or engagement with industry on legislative or major policy changes (targeted survey question)



PGI staff demonstrate an understanding of your operation

Correlated Performance Accountability Framework KPI's: KPI1, KPI6



Consultation on major policy and legislation changes

- During 2017 the Petroleum and Gas Inspectorate and members of the RSH Policy Unit consulted with industry stakeholders including the Australian Petroleum Production and Exploration Association (APPEA), Queensland Resources Council (QRC) and members of the Petroleum and Gas Inspectorate's Stakeholder Engagement Committees (SECs) were consulted regarding the Land, Explosives and Other Legislation Amendment Bill 2018. Industry stakeholders were also able to provide submissions to the Parliamentary Committee inquiry into the Land, Explosives and Other Legislation Amendment Bill 2018, which RSH responded to as part of the Parliamentary Committee process.
- Industry stakeholders including APPEA, QRC and members of the SECs were briefed and invited to comment on the consultation draft of the Petroleum and Gas (Safety) Regulation 2018. Industry representatives also had opportunity in May 2018 to attend Question and Answer sessions about the consultation draft. Advice about the proposed new regulation was also announced at 14 gas fitter trade nights across Queensland during May and June 2018.
- The SECs comprise representatives from the upstream, distribution and downstream sectors of Queensland's petroleum and gas industry.
- Consultation on significant policy changes included review of operating plant, review of gas work licensing fees and biogas sector regulation.

Consultation activities

Refer also to responses in KPI 1.

RSH internal information sharing activities

Regular information sharing occurs between the inspectorates and other business units at the monthly RSH Leadership Group meetings and Chief Inspectors meetings.

- Members of the RSH Policy Unit regularly attend the quarterly Petroleum and Gas Inspectorate Stakeholder Engagement Committee meetings and quarterly Petroleum and Gas Inspectorate review meetings to provide updates on policy and legislation matters.
- RSH Policy Unit provides specific policy and legislation updates at the Chief Inspector's weekly stand-up meetings as required.

- Formal and informal meetings occurred between the Petroleum and Gas Inspectorate and the RSH Policy Unit to discuss various policy projects and other matters related to the regulatory framework and stakeholder feedback. This included discussion on the Land, Explosives and Other Legislation Amendment Bill 2018 and the remake of the Petroleum and Gas (Safety) Regulation 2018 and various reform projects being undertaken by the Inspectorate.

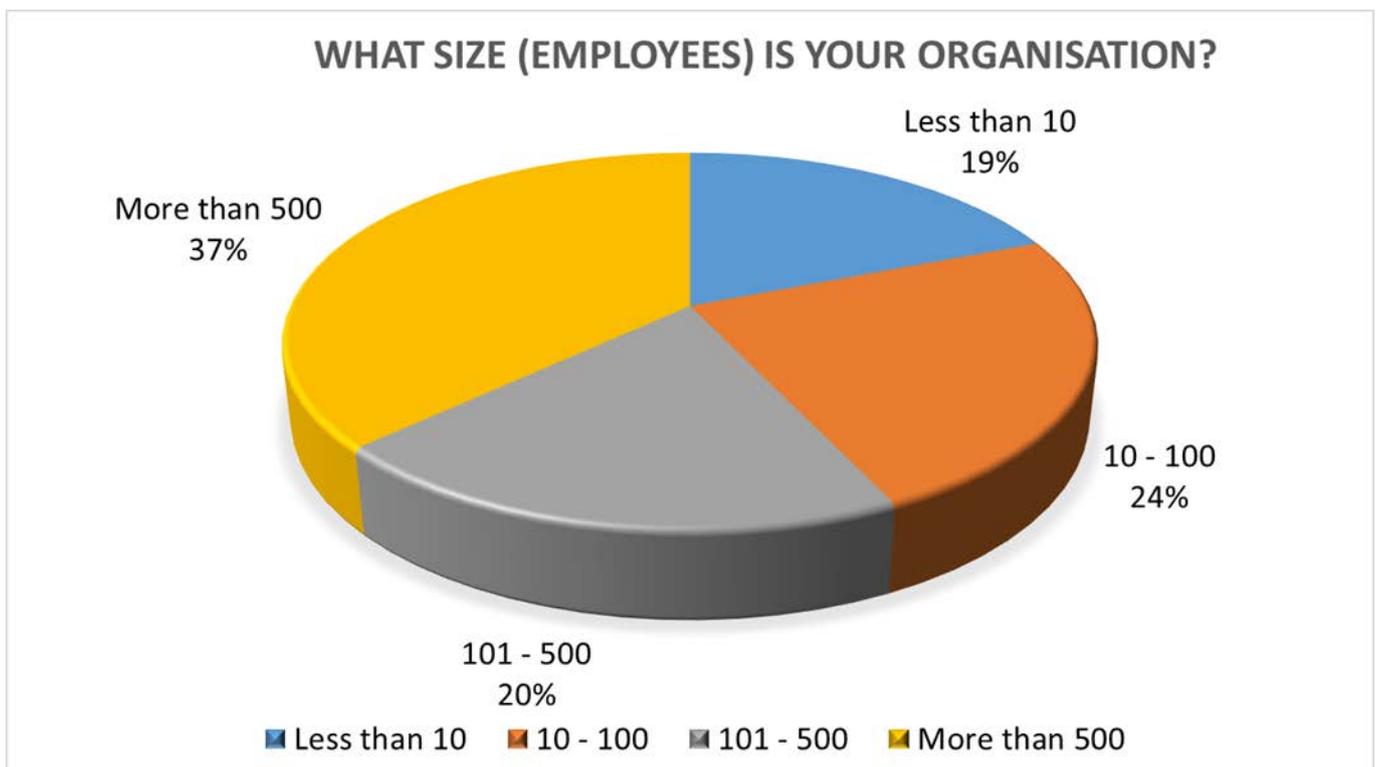
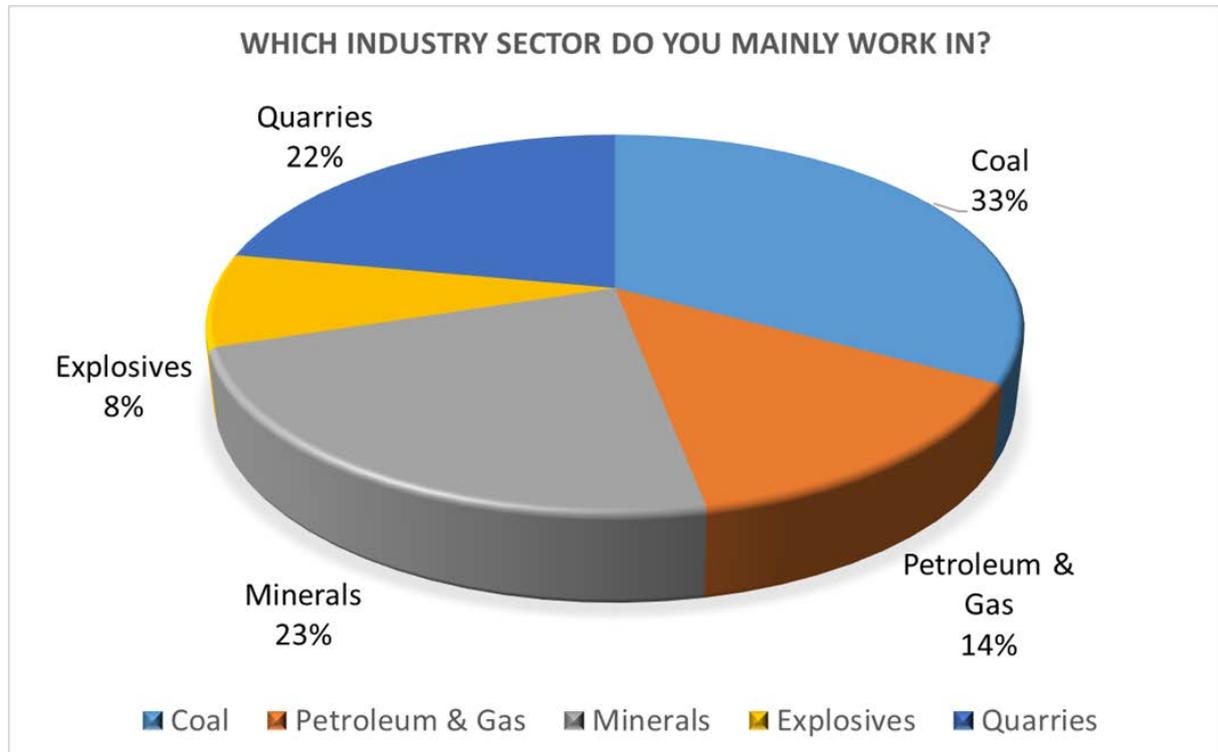
Stakeholder surveys

The Petroleum and Gas Inspectorate did not conduct any stakeholder surveys in 2017-18.

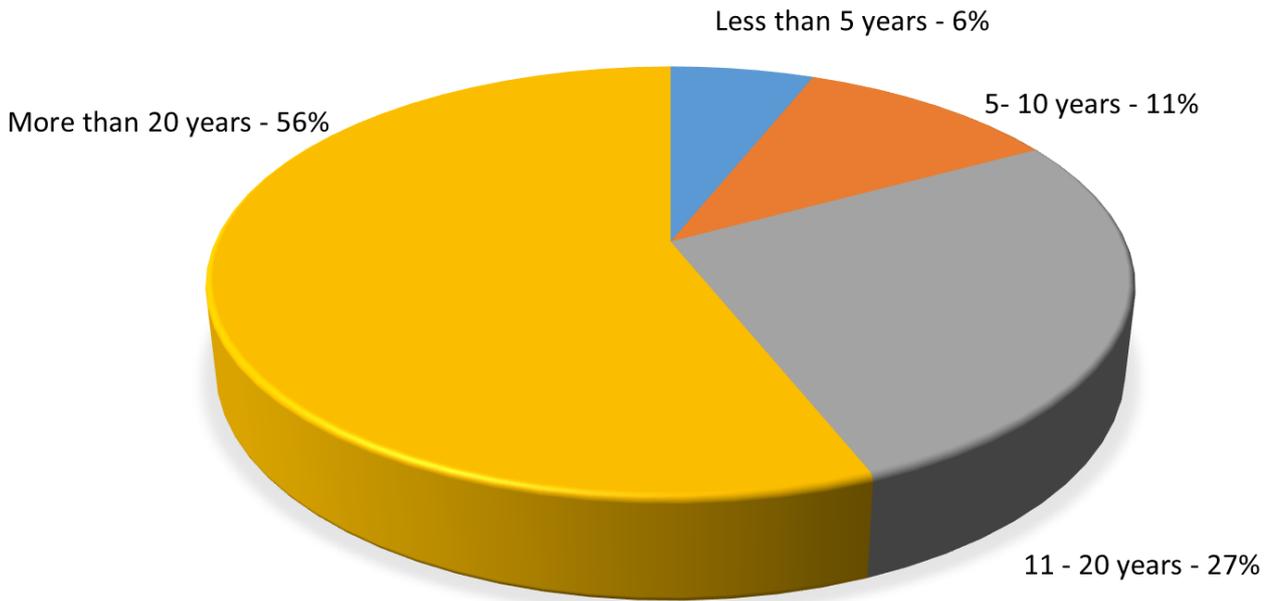
Feedback mechanisms

Refer to responses in KPI 2, KPI 3 and KPI 4.

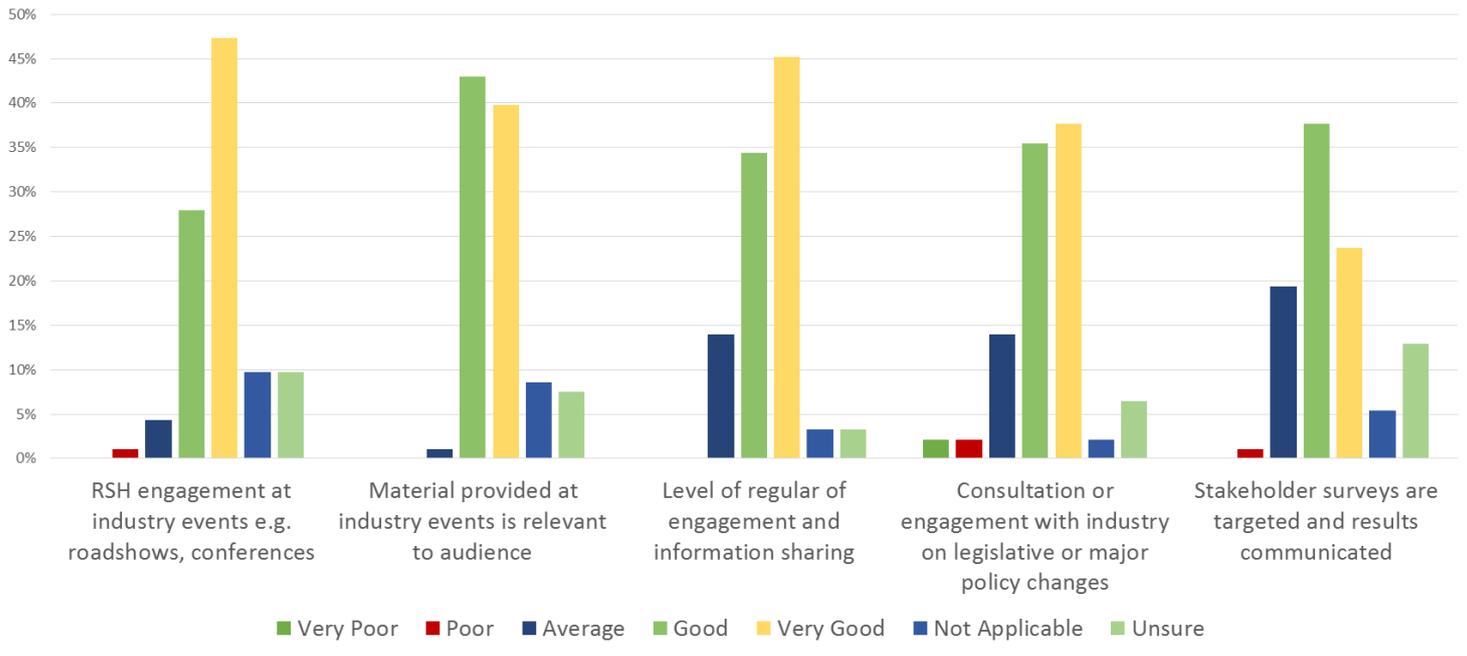
Resources Safety and Health 2018 Stakeholder Survey Results



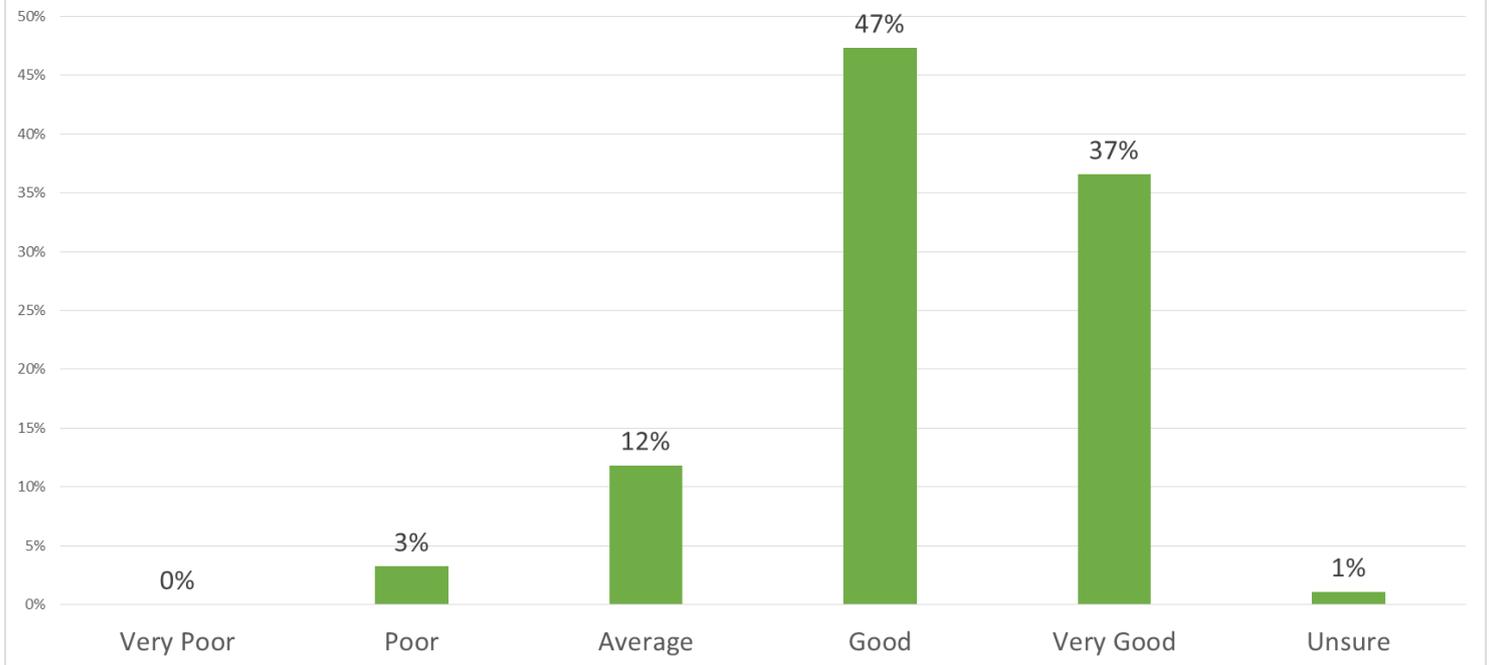
HOW LONG HAVE YOU BEEN WORKING IN YOUR INDUSTRY?



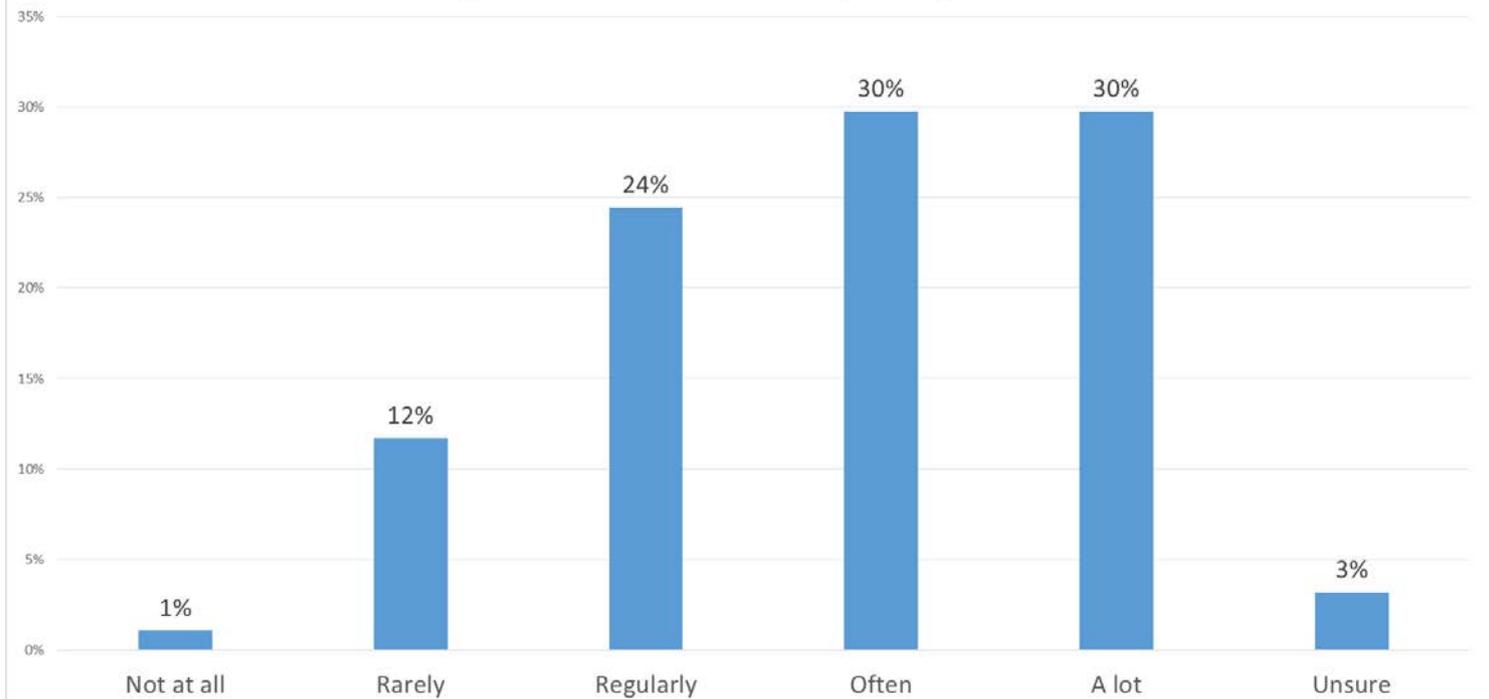
Resources Safety and Health staff demonstrate an understanding of your operation



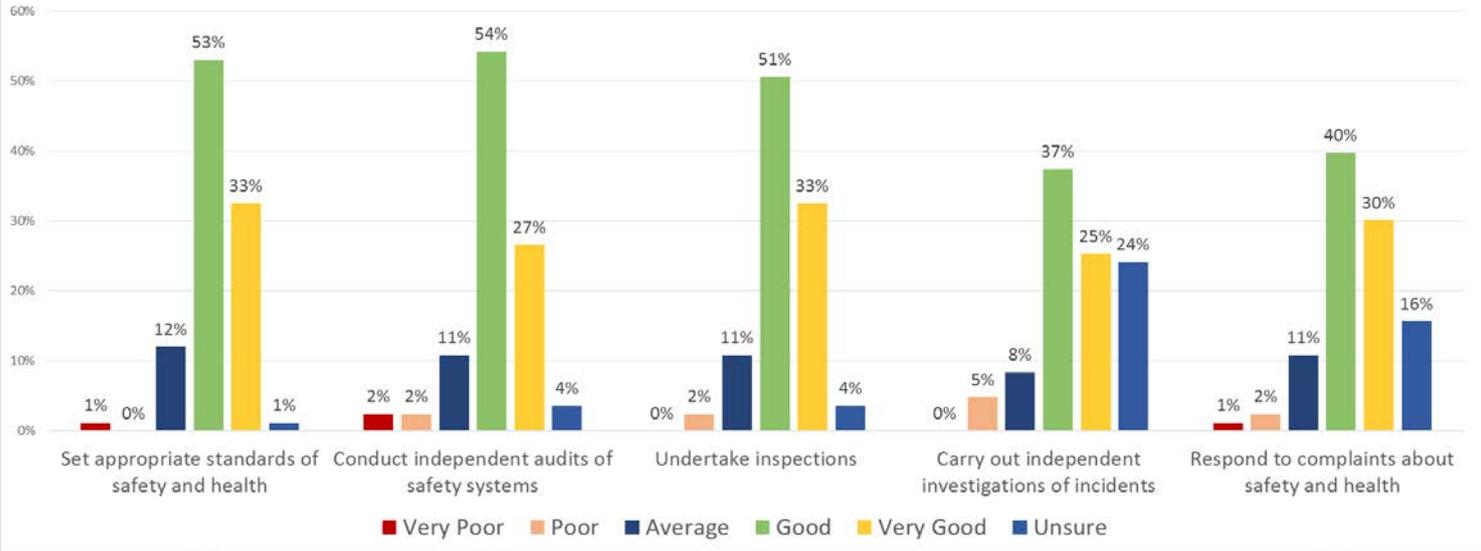
Overall, how well do you feel that Resources Safety and Health performs in terms of being a proactive safety and health regulator?



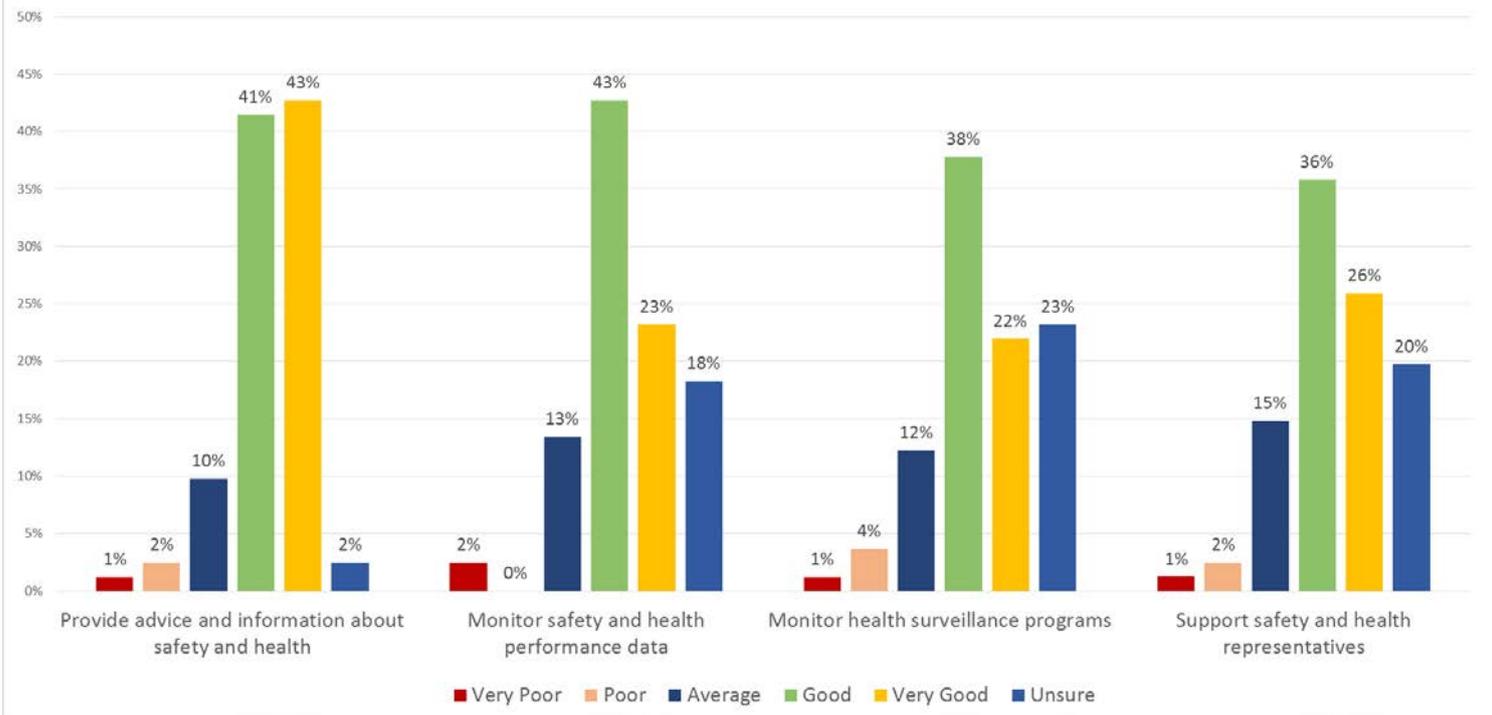
To what extent do you feel that Resources Safety and Health supports positive safety and health outcomes for your organisation?



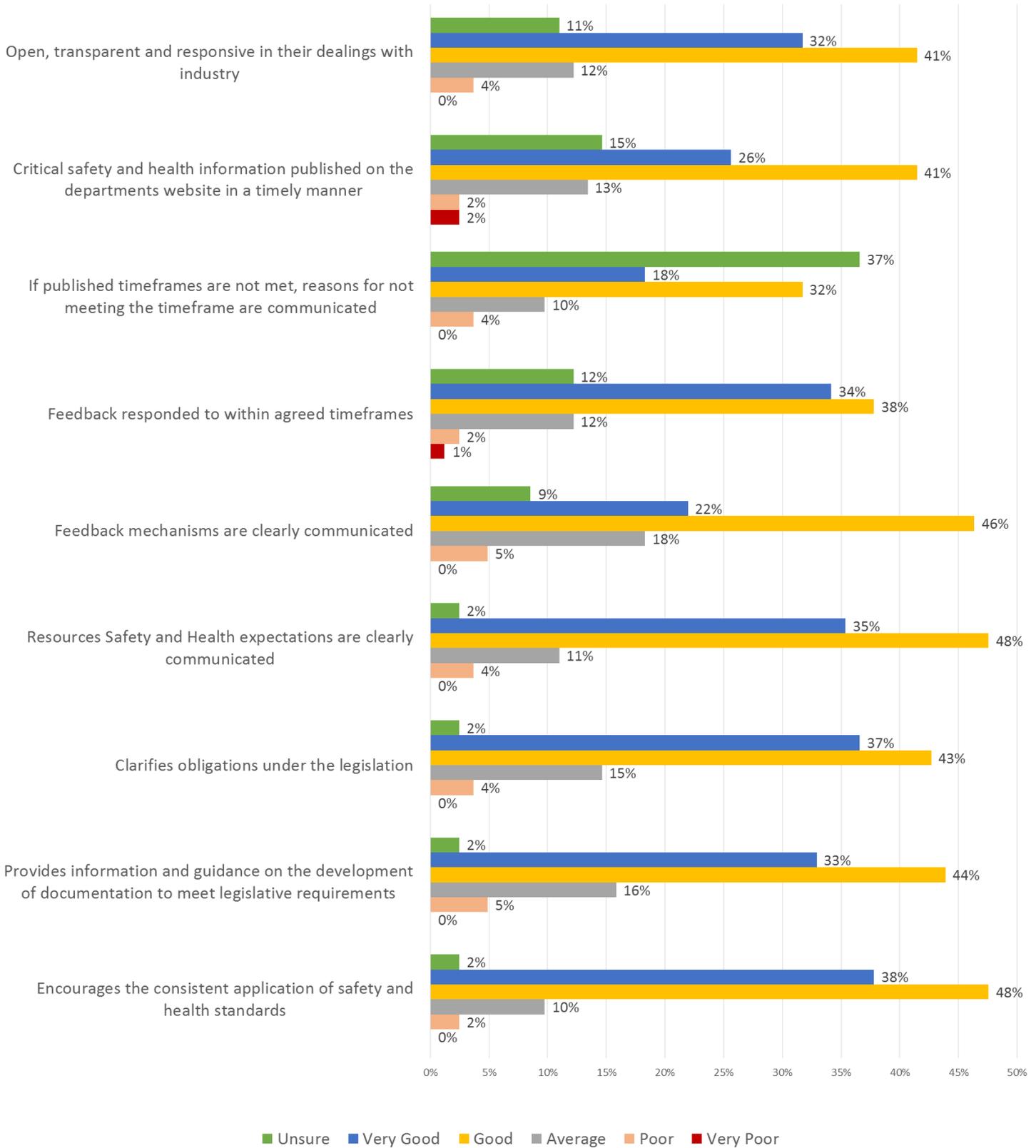
Compliance activities - How well does Resources Safety and Health perform in the delivery of these functions?



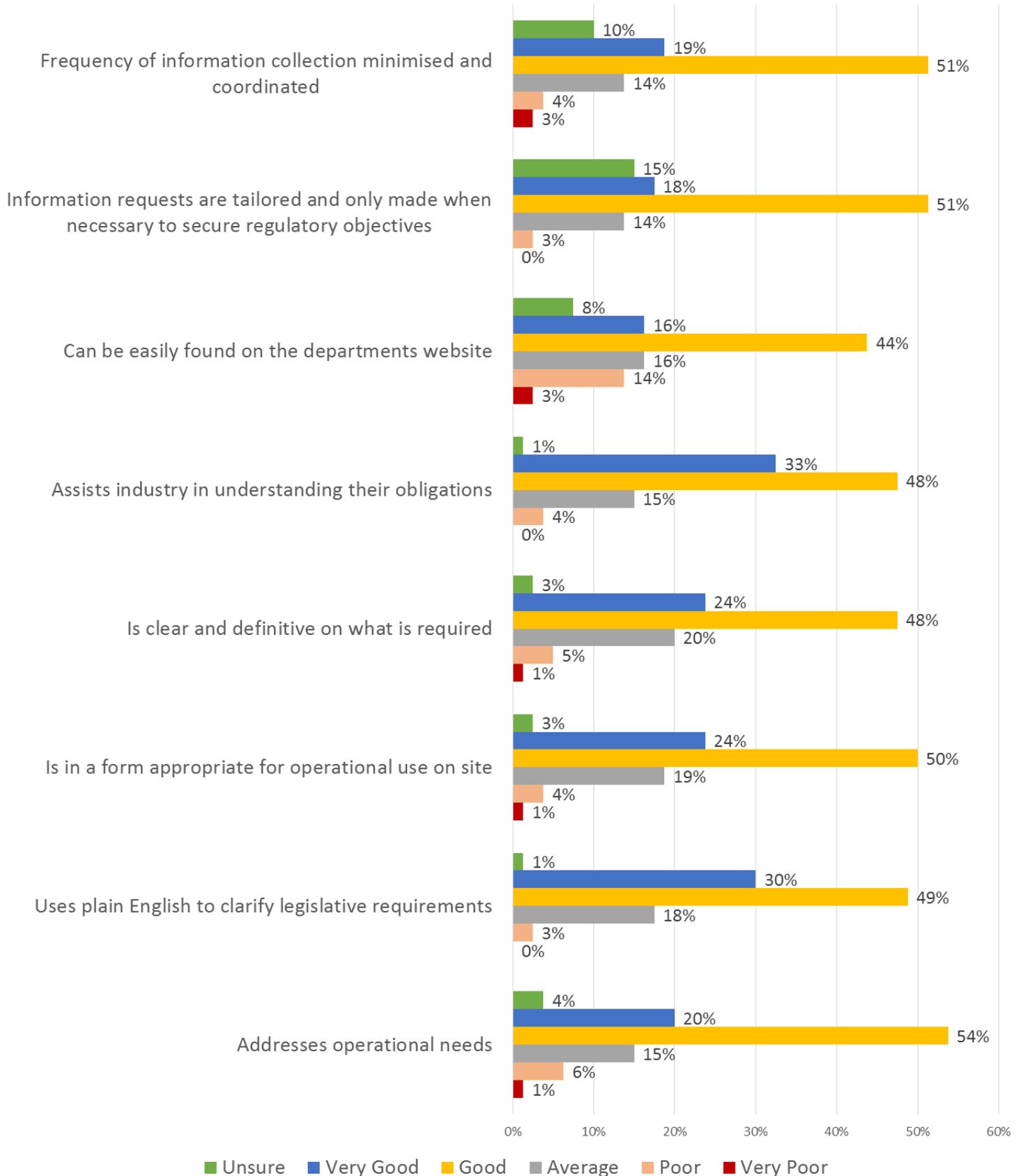
Raise awareness and promote safety and health outcomes - How well does Resources Safety and Health perform in the delivery of these functions?



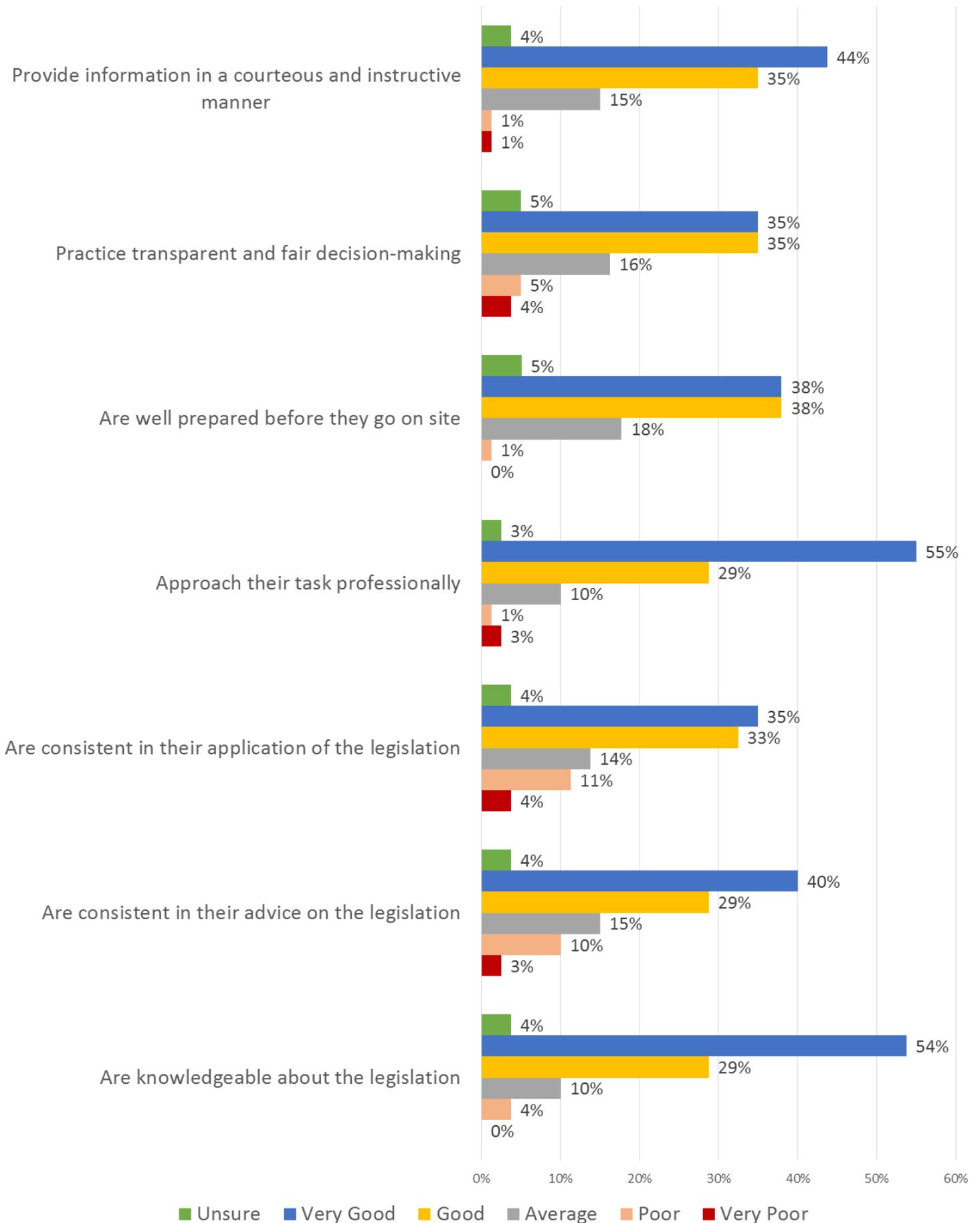
How well do you think Resources Safety and Health performs when working with industry to reduce the likelihood and consequence of serious incidents and fatalities?



Information and Guidance Material - How well do you think Resources Safety and Health performs :-



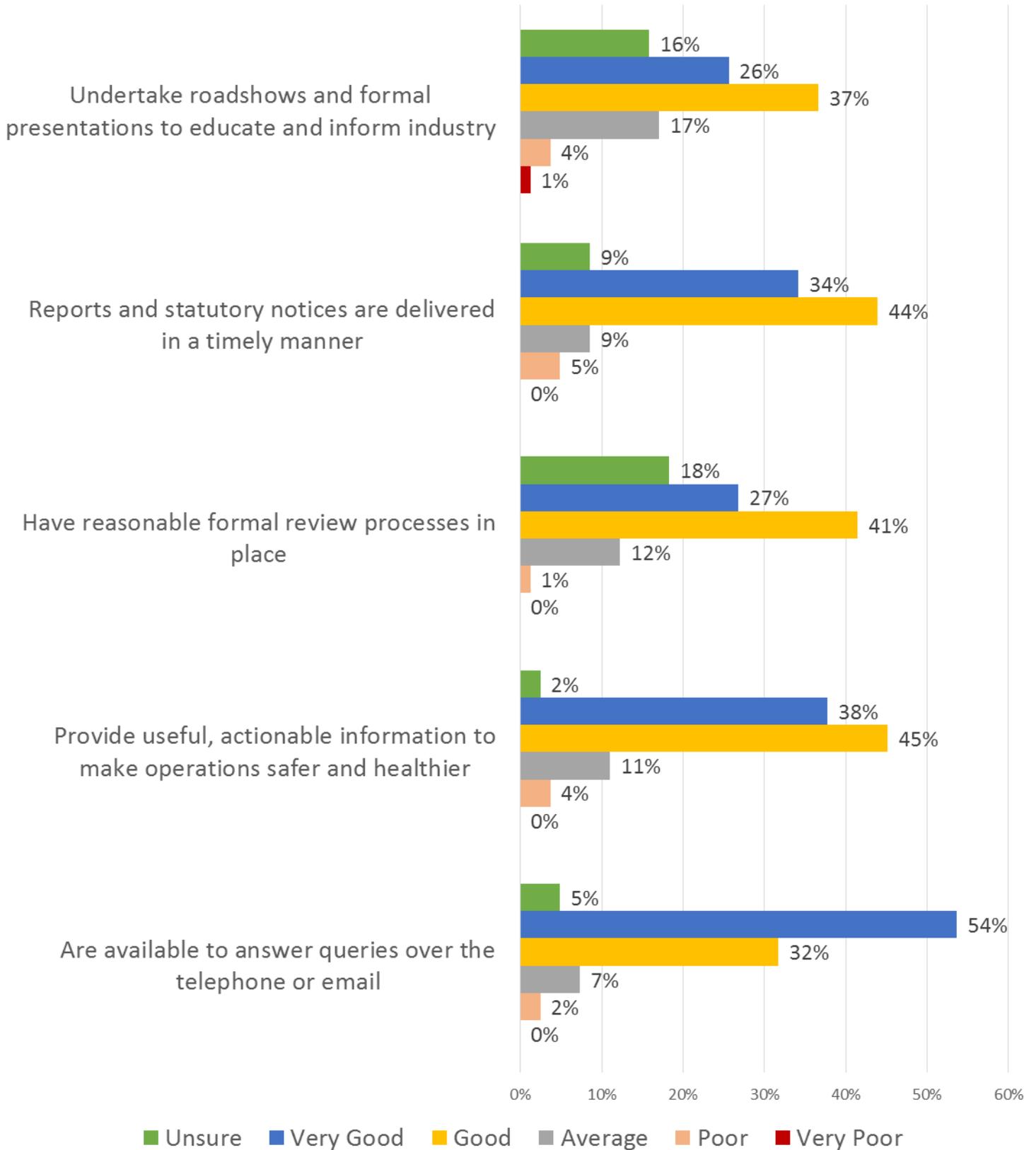
Performance - How well do you think Resources Safety and Health Inspectors perform on the following?



Delivery of functions - How well do you think Resources Safety and Health performs on the following?



Communication and Information - How well do you think Resources Safety and Health performs on the following?



Did you access, download or receive any of the following resources from Resources Safety and Health during the last 12 months?

