

Inspection of work-related psychosocial issues on an offshore installation

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During normal health and safety inspections on Danish offshore installations in 2018, Danish Working Environment Authority inspectors found indications, that installations with a high number of work related incidents, serious gas releases and high number of enforcement notices, also seemed to have a higher absenteeism rate due to stress, poor employee engagement and a higher number of formal complaints from workers. The Danish Working Environment Authority decided to look closer at these issues with a dedicated inspection of the psychosocial conditions in the workplace. Dedicated inspections evaluating psychosocial issues are regularly used during onshore inspections in Denmark, but had not previously been used offshore. The psychosocial conditions relating to stress and abusive conduct, including bullying and sexual harassment has been a key topic in the area of working environment in Denmark in recent years.

Legal framework

Psychosocial work environment and thus work-related stress are covered by the Danish Offshore Safety Act.

According to the Offshore Safety Act, the employer on an offshore installation shall ensure that health risks connected with the performance of work are identified, assessed and reduced to a level as low as reasonably practicable, cf. Para 53. It also follows from the Offshore Safety Act, that the operator shall prepare a Health and Safety Document, which – among other things - shall identify the health risks, assess these risks and demonstrate that the risks have been identified, assessed and reduced to a level as low as reasonably practicable, cf. Para. 23, section 1, subsection 1–3.

It follows from the Executive Order on Operation of Installations, Connected Infrastructure and Pipelines in connection with Offshore Oil and Gas Operations that it must be ensured that the work does not entail any risk of physical or mental health impairment as a result of abusive conduct, including bullying and sexual harassment, cf. Para 8 of the aforementioned Executive Order.

It follows from the explanatory memorandum to the Offshore Safety Act, which was tabled before the Danish Parliament, and which has a legally binding status, that the concept of health in the law entails protection against accidents at work and occupational diseases in the traditional sense, as well as protection against other influences that can impair physical and mental health. It also follows from the explanatory memorandum, that psychosocial stress must be avoided.

Psychosocial inspections

The Danish Working Environment Authority (DWEA) only reacts to observations of stress, if the problems are caused by the individual employee's work function. The problems will then be linked to the work process, working time and hours, working procedures, products used or the physical framework that is needed to perform the work. For observations of abusive conduct, including bullying, violence and sexual harassment, the Inspector can take action, regardless of the cause of the problems.

The DWEA Inspector's assessment of work-related stress, is generally based on an analysis of the relationship between the psychological demands of the work and physical characteristics of the job and other influences in the workplace, such as the employee's control over the work. This includes the opportunities to influence the design and organization of one's own work, as well as the opportunities for support and feedback from management and colleagues. These factors constitute the basis for employees to meet the requirements of the work in a safe and healthy manner.

Matters of work-related stress can be complex. Therefore, it is not possible to specify simple norms for when the DWEA will take action in relation to the individual risk factors. The Inspector's actions and decisions regarding work-related stress will always depend on a specific assessment of the interaction between a number of risk factors including, but not limited to:

- Level of demands or opposite demands, influence on one's own work, collegial or managerial support and feedback,
- Exposure to traumatic events at work,
- Threats or actual acts of violence and/or harassment, and
- Fatigue and work schedules.

If the DWEA finds that employees, in their work function, are exposed to risk factors that leads or can lead to negative health and safety consequences, the operator is instructed to ensure that the risk factors in question do not impair the safety and health of the employees.

If the DWEA identifies or are made aware of work-related stress, or stress hazards in the workplace, the goal is always, as with other safety and health issues, to get the company to solve the problem.

The inspection procedure that was used to evaluating psychosocial issues on this specific inspection is outlined below. This inspection was done with a regular offshore Inspector joined by specifically qualified/trained psychosocial inspector.

Psychosocial inspection preparation including evaluation of the workplace risk assessment

Preparations for the psychosocial inspection, includes evaluation of the legally required workplace risk assessment, absenteeism statistics, minutes of meetings from the Health and Safety Organisation on the installation and results from the company's engagement surveys.

The workplace risk assessment process, that is required for all companies working offshore and onshore in Denmark, consists of five elements that the company must perform: survey the company's working environment to reveal any health and safety issues, describe any health and safety issues and evaluate how to resolve them, assess if there are working environment circumstances that contribute to increased sick leave, draft a plan of actions that describes, among other things, when, how and by whom any problems will be resolved and describe how the company will follow up on the plan of action, including who is responsible for carrying out the plan in practice. The DWEA will check during inspections whether the risk assessment is up to date and has been implemented as required by law.

The psychosocial inspection offshore

The inspection procedure for psychosocial inspections is generally based on group interviews with groups of employees from the individual work areas of the installation.

Inspections have the following steps:

- Initial meeting with the Health and Safety Organisation on the installation, where the framework for the inspection is presented, describing the legal framework for the psychosocial inspection, explaining that the statements in the group interviews will be anonymized and that persons must consent before a statement can be used directly by the inspector during, for example, the closing meeting with management.
- Group interviews guided by a DWEA question guides. Question guides are useful in identifying the risk factors in the work environment and ensuring that inspections on this challenging topic are carried out consistently. During the group interviews, the focus is on:

stress experienced during work, how employees experience the overall working environment and measures taken by the operator to prevent or minimize any psychosocial issues.

- After the group interviews, a final meeting is held with the installations management, where the inspector summarizes the conditions observed during the group interviews and the installation management is given the opportunity to comment.
- Finally a concluding meeting is held with the Health and Safety Organisation on the installation, summarizing all interviews and observations.

Summary

The Danish Offshore Safety Act requires, parallel with a focus on the physical conditions of offshore installations, also a focus on the psychosocial conditions on the installations. This is done to ensure risks are reduced to a level as low as reasonably practical. If the DWEA identifies or are made aware of psychosocial issues on offshore installations, inspections with a dedicated focus on psychosocial issues are considered a critical factor in ensuring that companies live up to this responsibility.

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