Process Safety Forum
Learning Brief #11 – Issued on 30 September 2014

Tips on Auditing of management of Change Systems

To ensure the effectiveness of Management of Change (MoC) processes, they should be subjected to periodic audit. Whilst an audit may be against individual changes raised, ensuring compliance to procedures, it should also consider any changes that may have been made without engaging MoC.

Through review of completed audits, the site can determine if audit takes place at appropriate intervals, are against defined criteria, and where appropriate, review the status of any corrective actions.

Appendix 1 provides an example of those checks that MoC Audit may cover. The actual checks carried out will be influenced by corporate process and systems.

Appendix 1 – Example MoC Audit Checks

Raising and completing the MoC Documentation		
Item	**Step**	**Example Check**
1	Description of Change	The type of change has been identified, for example: • Equipment • Instrument • Process variable • Procedure • Building • Information Technology • Alarm The correct risk assessment methodology has been identified, for example: • Hazard and Operability Study • Alarm Objective Analysis • Checklist • Other Process Hazard Analysis
2	Defining the Scope	Is the MoC title and description contain sufficient detail, for example: • Describes why the change is required • Lists equipment name and identifiers as appropriate • Relevant documentation is attached or referenced (and can be retrieved) • Identification of permanent or temporary change • If the change is temporary change, the removal date has been included
3	Safety and Environment	The MoC clearly identifies any safety and environmental considerations, and provides supporting documentation as necessary.
4	Risk Assessment	Verify that the requirements for the risk assessment team (for example core competency and disciplines) meet the corporate standard.
5	Assessing Hazards	Verify that hazards have been identified adequately by the risk assessment.
6	Assessing Risk	Verify that risk has been assessed using corporate standards (such as relevant risk matrices)
7	Identifying Control Measures	Verify that control measures have been identified and that they are sufficient to control the risks identified.

Raising and completing the MoC Documentation		
Item	**Step**	**Example Check**
8	Actions and Recommendations	Verify that any actions or recommendations required to implement the change, and those identified following the risk assessment, are clearly defined, realistic and assigned to appropriate personnel.

Signing off the MoC Documentation and Registering the Change		
Item	**Step**	**Example Check**
1	Signatories	Verify that the MoC documentation has the necessary signatures and that the signatories have the appropriate level of authorisation.
2	Registering the Change	Where corporate systems are in place to register the MoC, ensure that these have been updated correctly.

Closing Actions and Recommendations		
Item	**Step**	**Example Check**
1	Documentation	Verify that all documentation impacted by the change, have been updated, reviewed, approved and were appropriate registered in corporate document management systems. Documentation may include: • Piping and Instrumentation Diagrams • Cause and Effect Diagrams • Loop Diagrams • Datasheets • Calculations • Hazardous Area Diagrams
2	Regulatory Documentation	Verify that any documentation required to meet necessary legislation has been updated, reviewed, approved and were appropriate registered in corporate document management systems. Regulatory documentation may include: • COMAH Safety Report • Environmental Permits • On and Off Site Emergency Plans
3	Equipment	Verify that any equipment *removed* from service has also been removed from corporate asset registers such as: • SAP • Safety Critical Equipment Lists • Maintenance and Inspection Schedules Verify that any equipment *entered* into service has also been added to corporate asset registers.

Closing Actions and Recommendations		
Item	**Step**	**Example Check**
4	Procedures	Verify that all procedures impacted by the change, have been updated, reviewed, approved and were appropriate registered in corporate document management systems. This may include: • Operational Procedures • Inspection Procedures • Maintenance Procedures
5	Training	Verify that any training material impacted by the change has been updated reviewed, approved and were appropriate registered in corporate document management systems. Verify that any training required to be given as a result of the change has been completed, and training records updated.
6	Stakeholder Engagement	Where necessary, verify that relevant stakeholders have been informed of the change, this may include: • Health and Safety Executive • Environment Agencies • Emergency Services • Public