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<td>As Low as Reasonably Practicable</td>
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<td>BOHS</td>
<td>British Occupational Hygiene Society</td>
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<td>Configured for Medical Duties</td>
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<td>CRO</td>
<td>Control Room Operator</td>
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<td>FOD</td>
<td>Foreign Object Debris</td>
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<td>FRSM</td>
<td>Fluid Resistant Surgical Mask (in the context of helicopter travel, this is for Category C helicopter passengers only)</td>
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1 Introduction

1.1 Background

The offshore oil and gas industry has been working to manage the threat posed by COVID-19 and as part of the national critical infrastructure, it is required to maintain operations to ensure security of supply for the UK.

From the outset, industry has engaged with regulators, trade unions, governments and public health agencies to ensure that these operations are and continue to be conducted in line with government advice, existing health and safety law and good practice. The situation is dynamic, and any apparent conflict between this guidance and advice from government and public health agencies will be a result of such advice being updated – every effort will be made to ensure that changes are captured as soon as reasonably possible. Government, regulatory and public health advice will always supersede the industry good practice outlined here.

This guideline provides information on how the offshore oil and gas industry has responded to the pandemic, building on lessons learned to outline how safe working has been maintained during the pandemic, and demonstrating how it can increase activity levels safely from the minimum manning implemented by the majority of operators at the start of the epidemic in the UK.

Monitoring of the effectiveness of the industry approach is being undertaken by operators through their internal assurance process, including feedback from workforce and elected safety representatives, and also at industry level, by weekly review of the number of individuals being returned onshore via CMED helicopter flights and by collation of heliport screening results from operators and feedback from regulatory oversight.

The aim of industry in managing any health and safety risk has always been to reach the “as low as reasonably practicable” threshold (ALARP), and this remains true for non-process risks such as that posed by COVID-19.

The first section of this document outlines risk management approaches and how these will be used by industry in managing COVID-19, then, using the hierarchy of control, following sections provide examples of common considerations and controls to assist with the process of managing risk onboard an offshore installation.

It should be noted that this document outlines a sensible and proportionate approach to help the industry manage specific health risks during the coronavirus (COVID-19) outbreak. It is not exhaustive and is not intended to replace existing obligations for managing wider health, safety and environmental aspects of offshore oil and gas production.

Installation operators continue to maintain management arrangements for health, safety and the environment, particularly the integrity of major accident hazard plant and safety and environmentally critical equipment, including during a security of supply scenario. This includes:

- Complying with each installation’s Safety Case and OPEP
- Ensuring installations have an appropriate number of competent staff to manage health, safety and environmental risks; and
- Ensuring health, safety and environmental protection is not unduly compromised
The presumption is that, wherever possible, existing arrangements to manage health, safety and environmental risks will be maintained, along with any specific undertakings made to regulators, including those listed in installation permit conditions or outlined in letters.

In applying this guidance, employers should be mindful of the particular needs of different groups of workers or individuals. It is breaking the law to discriminate, directly or indirectly, against anyone because of a protected characteristic such as age, sex or disability. Employers also have particular responsibilities towards disabled workers and those who are new or expectant mothers.
2 Risk Assessment and Workforce Engagement

Risk management is at the core of the offshore oil and gas industry. The existing risk management framework should be used to manage the COVID-19 risk and to ensure that controls implemented do not undermine the existing risk management framework outlined in the installation Safety Case, the written scheme of examination for safety and environmentally critical elements and other documented risk assessments. The form of the COVID-19 risk assessment will be decided by the installation operator, bearing in mind the common risks across all operations, but also the specificities of the work environment and work scopes on individual installations.

SI 971 requirements for elected safety representatives for each installation means that workforce engagement and communication about risk management can use existing arrangements to ensure that the workforce is consulted on managing COVID-19 risk. Engaging the workforce effectively in any process to change working arrangements from the current minimum levels will be essential to successfully identify effective controls and barriers, and assist in reducing the risk to as low as reasonably practicable, as required by existing law. Workforce engagement should include sharing information on the controls that have been considered but not implemented, as well as those that have, and the reasons behind these decisions. As part of the decision-making and ALARP demonstration, the elected safety representatives and the workforce should also be informed of additional risk reduction measures that were considered but ruled out because they were not practicable or did not provide sufficient risk reduction.

One of the challenges of risk assessment for COVID-19 is the fact that comparatively little is known about the virus, and a significant proportion of the workforce will not be familiar with managing infectious disease risk. Clear communication about known facts relating to its spread, measures that are known to be effective against its spread, and its effects on individuals is an essential element in ensuring that the risk assessment process creates a proportionate and effective response. This knowledge will assist in including social distancing and infection control measures into job specific risk assessment, or at pre-work toolbox talks.

Knowledge of the mechanisms by which the virus is spread, and its effects, is increasing, and government advice is updated regularly to reflect this increasing knowledge. It is therefore important to note that any risk assessment along with the controls and barriers identified will of necessity be dynamic and should be regularly reviewed as both the wider pandemic situation and the level of manning and activity onboard changes. The figure below provides a generic barrier model that can be used to communicate the controls in place.

Further Information:

OGUK Managing Health, Safety and Environmental Risk Associated with COVID-19 Pandemic on Offshore Installations

British Occupational Hygiene Society – Protecting Workers’ Health During the Extended COVID-19 Outbreak

https://www.hse.gov.uk/risk/controlling-risks.htm
Figure 1: COVID-19 Barrier Model
3 Who Should Go To Work

3.1 Pre-mobilisation Checks

Pre-mobilisation communication should be carried out with all personnel intending to travel offshore before they mobilise from their home location. The method and content of the communication is determined by operators, however, it should reiterate the importance of following national guidance for the current stage of the pandemic response: in this case remaining at home if the worker, or anyone in the worker’s household has symptoms consistent with COVID-19, in line with government guidance. Individuals advised to self-isolate as a result of the reinstatement of contact tracing by the UK and devolved governments should also be advised to stay at home.

An additional barrier is in place to identify individuals who have become symptomatic between the time they leave home and the time they reach their mobilisation point. Temperature and health screening is conducted as standard across all heliports. Anyone who fails this screening will be given advice on what they must do to comply with government requirements, and will not be permitted to proceed offshore.

Some operators have implemented pre-mobilisation PCR testing for workers, preventing anyone testing positive for COVID-19 from proceeding offshore. Individuals who test positive will be given appropriate advice on self-isolation in line with government requirements.

As key workers, priority testing is available to offshore oil and gas workers and members of their household if they display symptoms consistent with COVID-19, including those who are refused travel offshore as a result of screening. A negative test result and the absence of symptoms for forty-eight hours may in certain circumstances permit an individual to return to work before the 7 day self-isolation or 14 day quarantine period is ended, but only under clinical advice and after consultation with the relevant employer and installation operator. In the case of contact with a confirmed case, the 14 day quarantine must be completed in full. OGUK guidance for use by company medical advisors on returning to work following test results is available at the link below.


3.2 Vulnerable Groups

UK Government advice identifies two groups of people who may be at higher risk of developing severe COVID-19 if they become infected, termed “vulnerable” and “extremely vulnerable”. Extremely vulnerable individuals are currently advised to “shield” at home and should not be working in a setting where it is not possible to socially distance.

Operators and employers should use the available health information on vulnerable to identify workers who may be at higher risk of developing severe illness if they are infected, and make a risk-based decision regarding their mobilisation, which may include:

- the risk to the individual of developing severe symptoms offshore
- the impact on the teams who may need to look after them offshore if they do get sick
- the impact on business / safety critical roles and appropriate manning levels
OGUK guidance on conducting this assessment notes that normal occupational health processes should be followed, and that information about the specific measures in place on the installation in question should be factored into this decision making. While the assessment should be made by the employer, operators of installations may also decide to restrict mobilisation of certain groups based on their own assessment.

The OGUK guidance can be found here:


Lockdown measures currently in force for the wider population include school closures and household isolation rules, which may also impact on an individual’s ability or willingness to return to work. These are outside the scope of this guidance and should be managed by the employing company in line with their own company policy.

3.3 Essential Work

Government guidance remains in place that states those who can work remotely should continue to do so. Some activities, or parts of activities, can be conducted remotely rather than onboard installations – for example, training, assessments, audits and inspections. Installation operators should continue to review work scopes to identify aspects that can be completed without mobilising personnel wherever it is reasonable to do so. However, it is in the nature of the work that most offshore activities will require personnel to mobilise to the workplace.

Oil and gas businesses are not included in the list of public-facing businesses that were ordered to close at the outset of the pandemic, and as part of the national critical infrastructure were in fact expected to maintain operations. The reduced manning onboard installations was a critical control measure against COVID-19 infection when it was not clear how widespread or how severe the outbreak would be.

For clarity, the Scottish Government advice published at the end of April regarding essential activity included “essential repair, maintenance operation or decommissioning of oil and gas critical infrastructure, including supply chain services as required for these services, for safe exploration, appraisal and production to ensure long term energy resilience and security of supply”.¹

Minimum manning levels as implemented at the start of the pandemic can only ever be a temporary measure. Postponed activities become critical over time, and the balance between COVID-19 risk and major accident hazard risks will change as a consequence. Postponed workscopes should be subject to a comprehensive risk assessment to determine if the work should be undertaken during the COVID-19 pandemic or delayed to a later date. Operations must be conducted in a manner which manages the additional risk posed by COVID-19 to as low and as is reasonably practicable. Installation operators will make risk-based decisions about their own circumstances when deciding what work should go ahead, and which workers will be needed to conduct it.

4 Social Distancing Onboard

It is unlikely that any offshore installation will be able to achieve two metre distance between individuals all the time while maintaining safe operations. Social distancing guidance from government recognises this, requiring rather that is maintained wherever possible.

Offshore installations, like the rest of society, have been assessing and identifying changes that can be made to the workplace to maintain social distancing, or to reduce the associated risks of infection when it cannot be eliminated.

Current practice has been shared between installation operators via Step Change in Safety, outlining the types of changes that can be made to work on board the installation. HSE workplace guidance is also relevant to certain aspects of offshore work, so that same simple approaches can be made, following the hierarchy of control. The BOHS document referenced below has classed control measures for COVID-19 into this hierarchy.

Changes to work tasks should be made wherever possible to maintain increased frequency of personal hand hygiene routines and social distancing, but where this is not possible, actions to reduce the risk of infection should be considered, such as ensuring workers are not positioned face to face, the time in close proximity is limited, enhanced cleaning is conducted, etc. as outlined in the guidance documents mentioned below.

For offshore installations, common areas used during non-working hours must also be considered during the risk assessment. Changes may include reducing seating, spacing queues, and scheduling or otherwise reducing access to gyms, tv and smoking rooms (where these are provided).

Food service should also be reviewed to ensure that contact is minimised. The provider of catering and stewarding services should be included in this review.

Further Guidance:

Health Protection Scotland – Guidance for prevention and management of cases of COVID-19 on Offshore Installations

Step Change in Safety – COVID 19 Current Practice Checksheets for Onboard Installations


5 Managing Visitors and Contractors

As covered in section 3, a key consideration in the management of visitors and contractors is to reduce where possible the number of personnel attending the installation and ensuring only those who need to attend in person are mobilised.

For those who do need to attend in person, existing arrangements for managing visitors and contractors going to offshore installations already provide mechanisms for delivering many key elements relevant to working safely with COVID-19. Mobilisation processes, site inductions and record keeping are standard, and can be used to ensure that COVID-19 related information is communicated and understood.

Installation operators should ensure that expectations and any additional requirements are clearly communicated prior to mobilisation for personnel travelling to installations during the pandemic, and review third party COVID-19 risk management plans where they could impact the risk on the installation. For example, operators may wish to check that any bridging documents between the installation operator and contracting companies covers issues such as responsibility for arranging onward travel for individuals returning to shore to enter self-isolation.
6 Cleaning and Sanitising the Workplace

As with any workplace during the pandemic, enhanced cleaning routines are in place onboard installations to minimise the risk of infection. The changes made should reflect the mechanism by which COVID-19 is known to spread, that is directly via respiratory aerosols and through transfer of these through contact points and then hands to eyes, mouth and face. Removing the virus from surfaces through cleaning and sanitising provides group protection. This includes personal hand and respiratory hygiene. Effective hand washing or sanitisation before and after contact with surfaces and avoiding touching the face with the hands, will reduce the likelihood of surface contamination, as well as reduce the potential for virus transfer via contaminated surfaces. This is particularly important before and after eating.

The risk assessment should consider the requirement for routine cleaning frequency, enhanced cleaning requirements, cleaning between shifts and between rotations, as well as the arrangements for cleaning following identification of potential cases offshore.

Increased frequency of cleaning points of shared contact will be necessary. These include door handles, work surfaces, chairs and tables, but also equipment that is shared during or across shifts.

Additional cleaning routines may also be required for accommodation where reducing cabin occupancy is not an available option, and for shared sanitary facilities.

COVID-19 cleaning routines should account for any changes in access times for cleaning communal areas and cabins as well as the additional cleaning itself. It is likely that existing assumptions about the ratio of stewarding personnel to POB will be inappropriate given the additional duties required, and any decision to change manning levels should include a review of the additional cleaning this may entail.

Normal disinfectants and equipment are sufficient to conduct cleaning of the workplace environment, although additional supplies may be needed. In addition, as it is possible that individuals will need to enter isolation while offshore, the PHE infection, prevention and control guidance on cleaning non-healthcare settings should be followed to ensure this is done safely.

7 PPE and Face Coverings

PPE is the last stage in the hierarchy of control, and industry’s focus should therefore be on other measures which have a collective effect (e.g. social distancing and cleaning) in order to reduce the risk to ALARP. Only where these cannot be satisfactorily implemented should PPE be considered.

WHO and current government advice is clear that during the pandemic, medical or surgical masks should be reserved for two groups – those displaying symptoms consistent with COVID-19, and those caring for them. Healthcare workers performing high risk procedures may require RPE. Recent government advice for the general public is to use face coverings, which may provide a small benefit in preventing the spread of infection, in situations where individuals may be unable to maintain social distancing from other people. If personnel are making onshore journeys using public transport where social distancing is not possible, then non-medical face coverings should be advised for these journeys. It is important to note that face coverings are deemed effective in reducing the spread of infection by the wearer, not as protection from infection for the wearer.

Operators may wish to consider the use of face coverings as a control measure in activities where social distancing is difficult to maintain. Any such use should take into account the proper donning, removal and conditions of use, and any safety implications arising, for example the suitability of the fabric for work environment, or impact on communications.

However, the existing requirements for RPE to protect workers from other respiratory hazards in the workplace are not superseded by this advice. Installation operators will therefore need to ensure availability of suitable RPE or FRSM, in general for the following reasonably foreseeable situations:

- “normal” operations requiring respiratory protection, such as breaking containment, or emergency response duties
- Clinical assessment, treatment and care for individuals becoming symptomatic while onboard: primarily the installation medic and first aiders, if aerosol generating procedures are performed.
- Symptomatic individuals who need to leave isolation, for example during muster, or prior to and during transportation home.

Existing risk assessments and work instructions will identify the level of protection required in the first instance, government guidance is available on the appropriate RPE and other PPE to be used in the second, and symptomatic individuals should, wherever possible, use fluid resistant surgical masks (FRSM) in the third. Risk assessments should ensure that infection risk is considered for disposal of used RPE and face coverings. Further advice on face coverings and RPE can be found in the following documents:


The offshore oil and gas industry introduced the wearing of specific “snood” face coverings for workers during transit to and from the installation, only after these had been tested in the HUET and assessed as posing a low risk of posing a threat to the aircraft as Foreign Object Debris (FOD).
Increased global demand for PPE has led to pressure on existing supply chains and shortages of certain equipment. Due diligence is always essential when sourcing equipment from new suppliers, but organisations may need to take extra steps to ensure that equipment is in date and appropriately certified. The British Safety Industry Federation website has resources to assist with the authentication of certification.
8 Workforce Management

8.1 Shift patterns and work groups

Limiting contact between different shifts or work groups can assist in preventing the spread of infection, particularly when thinking about access to common facilities and areas. Where teams are conducting tasks where social distancing is not fully implemented, then limiting the contacts those teams have with others will reduce risk. Staggering start and mealtimes should be relatively straightforward but may impact on cleaning routines as access will be more difficult with smaller numbers using spaces over a longer time. Where larger changes are made to working times, such as moving to day/night shift working or increasing the length of trip beyond 21 days, this should be covered in the risk assessment.

https://www.stepchangeinsafety.net/resources/oim-guidance-for-offshore-rotas-and-rest-periods/

If cohorting is used, consideration should be given to ensuring critical roles are covered between different groups (e.g. not all CROs can be in the same group).

Installation operators should note that if an individual develops symptoms while offshore, or is diagnosed with COVID-19 in the forty-eight hours following demobilisation, contact tracing will be needed to identify close contacts the individual has had while on board. Information about cohorts and work groups will be essential to this activity.

Someone offshore may also be identified as a contact following exposure to a confirmed case onshore. This would mean the offshore personnel would be advised to isolate for 14 days from most recent exposure, or from symptom onset if the case shared a household with the member of staff.

8.2 Accommodation and Travel

8.2.1 Travel to and from Point of Mobilisation

An OGUK work group produced guidance on travel and accommodation for offshore workers, covering the movement at the commencement of their rotation from their ‘home location’ to ‘initial point for mobilisation pre-rotation’. Please note that this ‘initial point’ may be either a testing centre or a heliport or a quayside.

The current government advice is to avoid using public transport wherever possible, and OGUK guidance on personnel movement to and from work reflects this.

Additionally, the Guideline addresses the movement of a key worker at the conclusion of their work rotation from the ‘point of disembarkation post-rotation’ to return to ‘home location within the UK.

OGUK guidance on travel and accommodation can be found here:

An exemption for offshore workers from the requirement to quarantine for 14 days on entering the UK has been granted. Details are given on the government web site:


An IMO circular on international movement of workers, including offshore energy sector workers is also available


8.2.2 Travel to and from Installation

Travel to and from offshore installation is primarily conducted via commercial air transport, on approximately six different types of helicopter airframe. Barriers have been installed between passengers and flight crews, and face coverings (snoods) are provided for use during the flight to minimise the possibility of droplet spread while in the aircraft.

Survival suits and lifejackets are routinely sanitised between uses, as are ear protectors.

Arrangements are also in place for the transfer of individuals who are suspected of having COVID-19, or have been in close contact with suspected cases via CMED helicopters.

Further Information:


Stepchange in Safety COVID-19 Current Practice in Heliports and Helicopters


8.2.3 Accommodation Onboard the Installation

Current practice is to reduce the sharing of cabins wherever possible, or to limit sharing to different shifts, with cleaning conducted between occupants. However, this is not always possible, and sharing cabins may have to take place. Where this is the case, consideration should be given to how to minimise the spread of infection. Controls include further enhancement of cleaning routines, and limiting sharing to those already working closely together, also known as “cohorting”, to ensure the number of contacts is kept to a minimum.

Experience has also shown that where cabins are shared, or split across day and night shifts, then common leisure areas are likely to be more heavily used. The maximum capacity available for such common areas will be a limiting factor on sharing, unless alternative areas can be found.

It should be noted that in the event of an individual developing symptoms while offshore, or being diagnosed with COVID-19 in the forty-eight hours following demobilisation, contact tracing will be
needed to identify close contacts the individual has had while on board. Information about cabin sharing will be essential to this activity.

Engaging with the workforce to explain the necessity for sharing and asking for ideas on how best to manage it are encouraged.

8.3 Communication and Training

Where new ways of working have been implemented, training and exercises may be required to ensure these are understood and implemented. Examples may include socially distanced mustering during emergency response exercises, and additional precautions for first-aiders.

Communication with personnel should include reminders about the symptoms of COVID-19, and what to do in the event of developing them. Clear instructions on where to go to avoid contact with other personnel, and how to contact the installation medic by phone should be available to all personnel.

The best controls to prevent the spread of COVID-19 are perhaps the hardest to implement. Changing personal behaviours is essential, and as with improving safety culture, changing personal hygiene behaviours will take time and effort.

Repeated and regular communication of facts about the virus, including the way the virus is spread, the symptoms it can cause, the action to be taken if any develop, and the behaviours needed to prevent it will be needed to ensure that behavioural change is implemented and maintained.

8.4 Managing a Case of COVID-19 Offshore

Arrangements should be made on board for the isolation of individuals, including accommodation, provision of medical supervision, meals, and roles in emergency procedures such as musters and drills, until such time as the individual can be removed from isolation or returned onshore to isolate at home.

When an individual is to isolate at home, clear instruction should be given, in line with current government advice, about what they should do, and how they will make the journey home from the heliport. See section 8.2.1 above for further information.

As described in the OGUK document on movement of passengers, close contacts of anyone developing symptoms onboard must be identified, and a risk-based decision made on whether they should isolate on board or return home to isolate there. This will also need to be done in the case of contacts of someone who develops symptoms of COVID-19 within 48 hours of demobilisation.

While the likelihood of an outbreak onboard is minimised by the control measures in place, installation operators should manage any outbreak in line with current industry / HPS guidance to manage cases offshore (subject to regular review).

Guidance on this can be found in the document:

Public Health Scotland – Guidance for prevention and management of cases of COVID-19 on Offshore Installations
9 Further Guidance

Government Resources


Public Health Scotland – Guidance for prevention and management of cases of COVID-19 on Offshore Installations


Infection Prevention and Control

British Occupational Hygiene Society – Protecting Workers’ Health During the Extended COVID-19 Outbreak

https://www.hse.gov.uk/risk/controlling-risks.htm

https://www.hps.scot.nhs.uk/a-to-z-of-topics/covid-19/


Offshore Oil and Gas Sector Resources

https://oilandgasuk.co.uk/covid-19/

https://www.stepchangeinsafety.net/workgroups/covid-19/

https://www.stepchangeinsafety.net/resources/oim-guidance-for-offshore-rotas-and-rest-periods/

Other Resources

OGUK Guidelines
Member companies dedicate specialist resources and technical expertise in developing these guidelines with Oil & Gas UK with a commitment to work together, continually reviewing and improving the performance of all offshore operations.

Guidelines are free for our members and can be purchased by non-members.