EPOL Relative Response Guidance

Revision 2.0

December 2020

Contents

1. Introduction

This guidance has been produced by the Relative Response and Evacuee Reception Working Group as a Sub-Group of the Emergency Preparedness Offshore Liaison (EPOL) Group. The aim of this document is to provide a synchronised approach to Relative Response, following incidents within the UK Oil and Gas offshore community and feedback received from operators, contractors and training providers.

2. Background and Purpose

Formal EPOL Relative Response guidance was first produced and issued in 2016, to provide a consistency of approach across the industry. There appeared to be an evolving approach to Relative Response over the years with no formal guidance ever having been produced; this resulted in people from a variety of backgrounds having undertaken training which was not based on a consistent standard. The original guidance aimed to address these issues by providing a clear method for managing Relative Response and a high-level process for Relative Responders to follow.

An EPOL Sub-Group set up in 2019 to investigate the possibility of industry mutual aid in relation to Relative Response and Evacuee Reception Centres identified that several companies and training providers had raised issues with the guidance over the years, following feedback from exercise and live mobilisations. Disagreements with the EPOL guidance had led to companies developing their own standards, thereby defeating the original purpose of the document. In light of this, it was agreed that the Sub-Group should review the guidance, considering the feedback provided by operators, contractors, helicopter operators and training providers, and bring to EPOL for approval.

The updated draft was reviewed by the wider EPOL group and circulated to training providers for comment, with seven organisations providing additional feedback which was considered and incorporated into the final published version.

3. Data Protection

Issues around data protection and the handling of personal information were raised and discussed as part of the review, and the Sub-Group agreed that personal data held on Vantage – such as Date of Birth, address, etc. – should never be released to callers. Following legal consultation, it was agreed that an individual's presence on an installation or flight likely constitutes 'personal data' under the General Data Protection Regulation (GDPR) and that the sharing of this information with those other than the named Next Of Kin/ Emergency Contact could be considered processing or disclosing personal data without the express consent of the individual concerned. However, the processing of such personal data was considered justifiable on the basis of Legitimate Interests, in that the company has a genuine and legitimate reason to process such information; that it is necessary in order to reduce harm or upset to the individual and their loved ones during a traumatic incident; and that it is balanced in the sense that the only data being processed is the individual's location in relation to their profession. The benefits of processing of this limited personal data was therefore not considered to be outweighed by any negative effects to the individual's rights and freedoms.

As interpretations and approaches vary between companies, it was agreed that the EPOL guidance

should reflect best practice based on the experiences of members and training providers in responding to calls from family members during an emergency, and that ultimately it is the responsibility of individual companies to conduct their own Legitimate Interest Assessments to ensure that their RRT practices align with their own data protection policies and interpretations of GDPR.

4. Vantage Reports

Vantage is the main software used in the Oil and Gas industry for tracking personnel across assets and helicopter transfers. It also contains information relating to the employees of the companies involved, including Next of Kin (NOK) details and Emergency Contacts (EC).

Personnel mobilising to assets are given the opportunity at check in to update their personal details. It is therefore accepted that this is the most up to date and accurate information available for contacts in the event of an emergency and therefore should be the primary source of information. Personnel should be regularly reminded of the importance of having up to date information in Vantage, its use and limitations in the event of an emergency.

Vantage allows for the generation of several reports which show different information held within the system and can be used by those responding to an incident. These are:

- **By Surname** – An alphabetical list of Personnel on Board (POB)/ Passengers (PAX), organised by surname.
- **By Company** – A list of POB/PAX arranged by company, showing company contact details.
- **5 per page** – Gives a summary of all details, with five persons listed per page. NB: there are two versions of the 5 per page available which display slightly different information: the 'by company' report showing NOK and EC together is most useful/relevant for RRT.
- **Relative Response** – A report which gives one page per person on the POB/PAX, showing the NOK and EC contact details and which is particularly useful for Relative Response Teams. The RRT call handlers use this sheet to record the details of calls received.

Alternative systems to Vantage are also in use in some areas. In these circumstances, the company would have to develop their own form to allow for capturing of this information usually recorded on the Relative Response sheets. Best practice is to align any alternative system with the processes detailed within this document wherever possible. Where alternative systems are in use with a drilling contractor, vessel operator or other contracting company, this should be detailed – and the workaround confirmed – in Emergency Response Bridging Documentation.

5. Primacy

In the event of an emergency, several companies may be affected and mobilise their own Incident Management Team (IMT) to support the offshore response. In these circumstances, one company – ordinarily the operator or duty holder - will have 'primacy' for the incident and be responsible for leading the response and coordination with regulators and emergency response services. This company's response team is therefore considered the lead or primary IMT.

The company with the primary IMT is also responsible for establishing the lead or primary Relative Response Team (RRT), unless otherwise specified in an emergency response Bridging Document.

Other companies who have personnel involved in the incident, and have mobilised a supporting IMT, may wish to establish their own supporting RRT. Regardless of the number of contracting companies involved and supporting RRTs mobilised, only the contact number for the primary RRT should be published and made available to the public.

Any calls received by the primary RRT from individuals concerned about personnel from contracting companies should be given updates as any other caller, but in addition given the relevant supporting RRT number for subsequent updates; this process is described in detail in the 'Call Handling' section.

6. Sharing of Vantage Reports

Once the primary RRT has been mobilised, the primary IMT will issue the POB/PAX lists to the RRT Leader.

Those contracting companies who have mobilised a supporting IMT due to personnel or asset involvement should be issued with the POB/PAX information relevant to their personnel only. This should include the relevant copies of the Vantage '5 per page – By Company' report to allow that contracting company to make notifications as appropriate. The supporting IMT should then provide the Vantage information to the supporting RRT as required.[1]

Heli admin or authorised personnel offshore update POB and PAX lists after flight landings and departures. Care should be taken if an incident occurs involving a helicopter during take-off, landing or inter-fielding to ensure Vantage has been updated. Every effort should be made to confirm POB/PAX lists for accuracy where flights are involved.

7. Confirmed Information and RRT Liaison

Relative Response Teams exist to provide confirmed information to callers, which has been provided to them in the form of a Holding Statement or Media Statement by the IMT. This ensures that the IMT has control over any information which is released to the public by the RRT, and in turns ensures the callers receive only accurate information.

A pre-approved Holding Statement should be issued by the primary IMT to the primary RRT as soon as possible after an emergency occurs. This typically contains basic information about the time, date and location of the incident and allows the RRT to begin to answer calls from members of the public. The Holding Statement should ideally contain the primary RRT telephone number when issued - or if the primary RRT is not in place at the time of original issue, be reissued as soon as it is - to ensure that members of the public can begin to make calls as soon as possible.

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[1] The Collabro Vantage system only allows Relative Response reports to be generated by surname, meaning the reports would need to be manually sorted and sent to each company As this is potentially restrictive in an emergency situation, the 5 per page company report should be provided as an alternative, as this captures all company employees and their EC/NOK contact information, ensuring the key information can be provided to each company in good time. The contracting company should then use their own Relative Response forms to record calls, should they be setting up a Supporting RRT.

Subsequent Media Statements containing more information will be issued by the primary IMT on an ongoing basis thereafter, usually in liaison with supporting IMTs. The primary IMT should ensure that the media statements are issued to the primary RRT and any supporting IMTs as soon as possible after approval, at the same time, and prior to circulation to the press. The supporting IMTs are then responsible for ensuring these are passed to the supporting RRT as soon as possible. This ensures that all RRTs are working with the same statements and that the RRT(s) become a trusted source for the public for the latest confirmed information relating to the incident.

Once RRT(s) are in place and the telephone number issued, the primary RRT will begin to handle calls, in accordance with the guidance set out later in this document. If calls are received in relation to the employee of a contracting company which has set up a supporting RRT, the primary RRT call handler should treat the caller the same way as they would any other call, but at the end of the call provide the number of the supporting RRT for them to call for subsequent updates. By operating in this way, callers can be directed to the most relevant RRT without the need to issue more than one RRT number in Media Statements.

If supporting RRTs have been mobilised, direct and regular liaison should be established between the RRT Leaders of the primary and supporting RRT(s). This ensures that any information regarding call volumes, particular callers, etc can be shared between the teams, and allows the RRTs to ensure they are working from the latest confirmed information.[2]

Any calls from the media that are received by the RRT(s) should be directed to the Media Response Team number, which is typically also detailed on Holding/Media Statements.

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[2] Some organisations prefer for RRT Leaders to communicate with the HR positions in their respective IMTs, who then share the Relative Response updates. However, establishing direct RRT Leader to RRT Leader contact relieves the burden on the HR function and ensures the timely passing of information. Regardless, companies should include their expectations in their Emergency Response Plans.
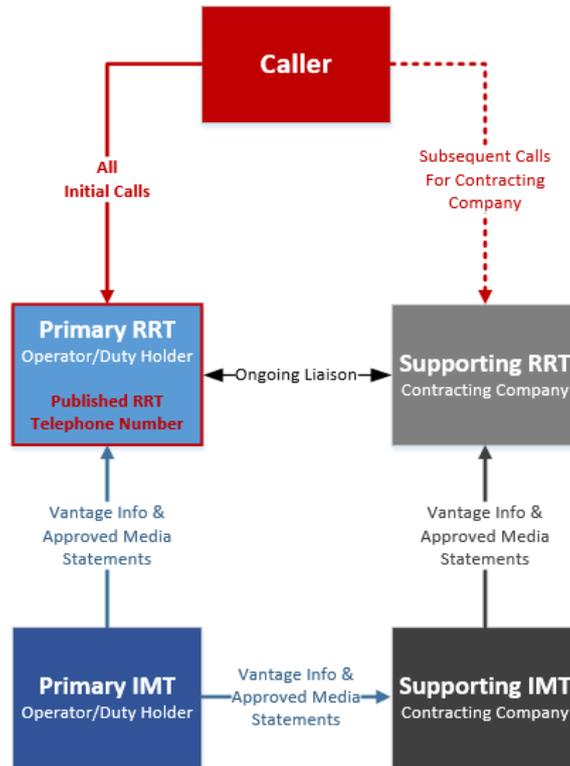
Fig 1: Flow of information between Primary and Supporting RRTs

8. RRT Call Handling

The purpose of a Relative Response Team is to receive calls from members of the public in relation to the incident and provide the latest confirmed information to the families of those involved.

Relative Response Teams may have historically been trained to ensure that the fact an employee is listed on a POB/PAX list is only communicated to individuals who are named NOK or EC as listed on the Vantage report. However, it is recognised that increasingly families are non-nuclear and there may be undue distress caused if information has been denied to a close relative – such as a long-term partner, child or sibling - purely because these are not listed at NOK/EC on Vantage. There must therefore be an element of discretion involved, to ensure that close relatives are not denied information to which they are reasonably entitled. Information may therefore be shared with a close relative who the RRT call handler is satisfied is a 'genuine' caller.

Regardless of the stated identity of the caller, the call handler should ensure that they ask the caller to confirm at least two pieces of key information about the individual from Vantage - such as job title, date of birth, address, etc - to satisfy themselves that the caller and their relationship to the employee is 'genuine'. It is important to note that the call handlers should not themselves disclose any of these details to the caller, rather to ask the caller to provide them: the call handler is not therefore disclosing any personal information. If in any doubt, the call handler should discuss the issue with the RRT Leader prior to any information being released.

Should the caller not be the NOK/EC/Close Relative, or is unable to provide satisfactory key information about the employee to which the call relates, they should not be advised whether or not that individual is on the POB/PAX list. However, as the statements available to the RRT are also released to the media, there is no issue with the call handler providing the confirmed information on the Holding/Media Statement to any caller.

If a caller is enquiring about an individual who is <u>not</u> listed on the POB/PAX list, the call handler should advise them of this, as this provides reassurance and helps to reduce the volume of calls received by the RRT.

Once the call handler is satisfied that the caller is genuine and that it is reasonable to release the information, they may confirm that the individual is on the POB/PAX list. It should be noted that this is different to communicating a 'Message of Involvement' as defined in Police Scotland Guidance on Notifying Next of Kin, as it does not make any comment as to whether the employee is 'injured, missing or apparently deceased', or the extent to which they are involved; only that they are on board at the outset of the incident. It is also different from a Proactive Family Notification, which is passed to the NOK/EC by Family Liaison/HR personnel within the company.

The NOK/EC/Close Relative should be asked to act as a single point of contact for all information relating to the person their call is regarding. The call handler should confirm the location of this person and that they will be contactable should any update be required, or if the Family Liaison or wider HR function needs to get in touch. If the call handler identified that a call is in relation to an employee of a contracting company which has set up a supporting RRT, the call handler should provide information in accordance with the process. However, prior to ending the call, the call handler should provide the number of the supporting RRT to the caller, to ensure that any subsequent calls go direct to the relevant contracting company. The RRT Leader of the primary RRT should then update the supporting RRT to advise them of this.

Call handlers should avoid making a promise or setting an expectation around callers being contacted by the company: rather the caller should be encouraged to contact the RRT for the latest updates.

In an incident, the IMT may be looking to establish contact with the NOK/EC of particular individuals, for example those who are definitively 'involved'/injured/missing. The IMT should provide these names to the RRT Leader, to ensure any calls are flagged as soon as possible. No further information on the status of those individuals should ever be provided to the RRT call handlers: they should never be in a position where they are aware of more information than they are permitted to give to the caller e.g. injury status, knowledge of death/missing person.

9. Helicopter Incidents

The response to any incident involving a helicopter ditching can be especially challenging for an RRT. In such a circumstance, the Family Liaison function will be working closely with the Police to send Proactive Family Notifications/Involved Messages to the families of all of those on the PAX list as soon as possible. However, it is possible that an RRT may be mobilised before such time as the Involved Message has been passed, or that calls may be received by an individual who is a Close Relative but not the NOK/EC and therefore did not receive the Involved Message.

In such circumstances, the expectation is that the RRT should confirm to the relevant NOK/EC/Close Relative that the individual being enquired about was on the affected helicopter and then advise that the caller's details (including current location and best contact number) will be passed on to the responding IMT so that a dedicated focal point can be assigned. The relevant details should be passed on as a priority, to allow the appropriate company or Police responders to commence Family Liaison processes.
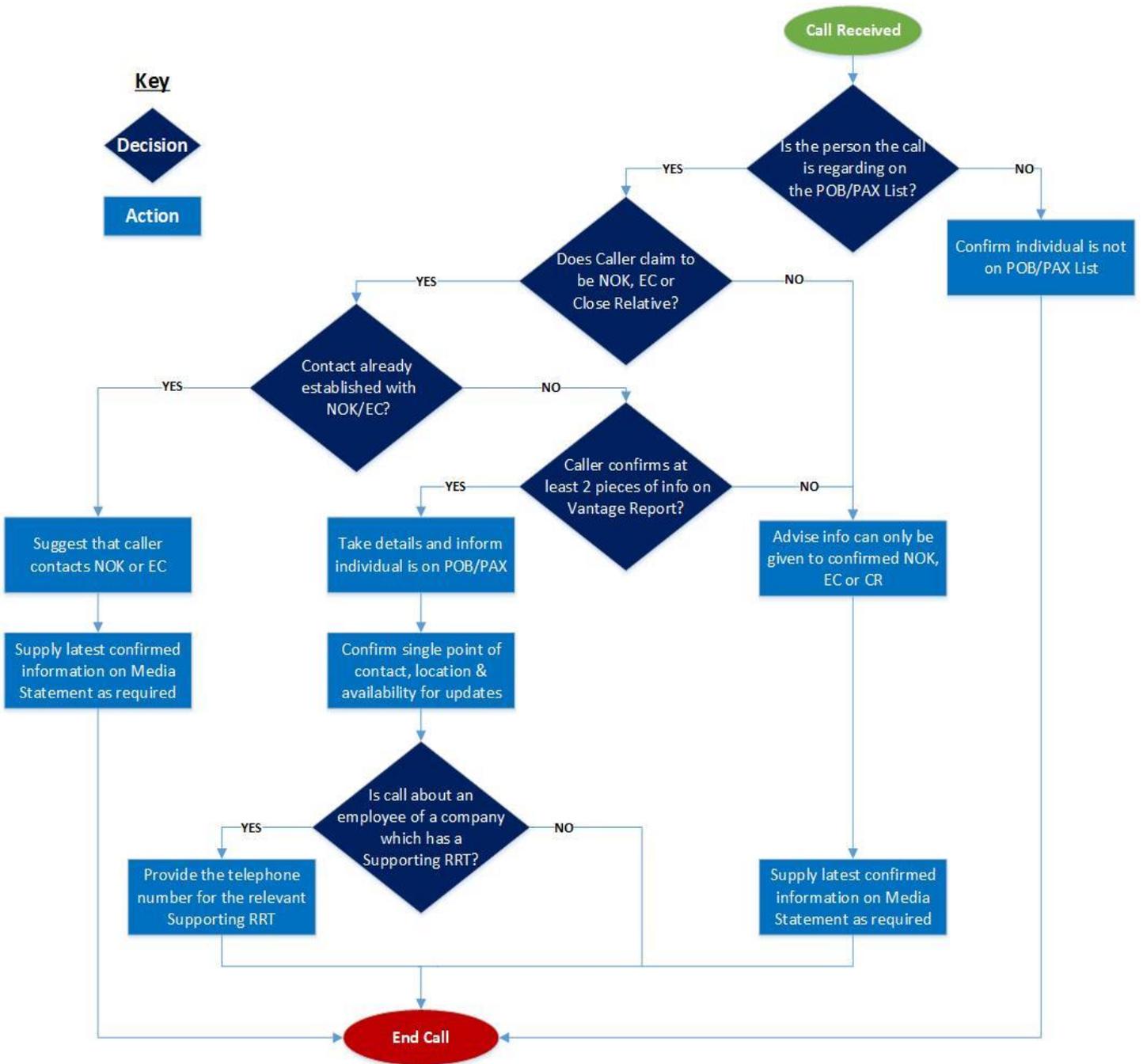
10. RRT Call Handling Flowchart

Fig 2: RRT Call Handling Flowchart

11. Glossary

Call Handler	The member of a Relative Response Team who takes calls from concerned members of the public.
Close Relative	An individual not listed as an employee's NOK or EC on Vantage, but who is a spouse/partner, parent, child or sibling of the employee.
Emergency Contact (EC)	An individual who the Company can contact in the event of an emergency. Employees can choose to register EC details on Vantage, if the EC is different from the Next of Kin. This individual must be over 18 years of age.[3]
Employee	For the purposes of this document, an individual who appears on the POB/PAX List.
Holding Statement	A basic, pre-approved Media Statement template, which is acknowledges that the company is responding to an incident, and can be populated with the time, date and location of an incident and quickly issued. Holding Statements may be 'proactive' or 'reactive'; e.g. distributed to reception desks etc. or held and issued upon receipt of requests.
Incident Management Team (IMT)	The primary onshore response team set up by a company to coordinate the tactical response to an offshore incident. May also be known as an Emergency Response Team, Incident Response Team, etc.
Key Information	Personal data held on Vantage which the call handler requests the caller to provide (without themselves disclosing the data) to allow the caller to demonstrate they are the NOK/EC/Close Relative of the individual concerned: Date of Birth of employee, full name and address of employee, full name and address of NOK, etc.
Message of Involvement	Police Scotland term used to describe the procedure for initially contacting NOK to confirm that someone has been involved in an incident offshore. In this context, involved means that the people are either injured, missing or deceased.
Next of Kin (NOK)	The nearest living relative of an employee, who the Police may contact in a serious incident. NOK Details must be provided when registering for Vantage. [3]
Proactive Family Notification	An initial notification made by the contracting company to the NOK/Emergency Contact of their employee, to confirm that someone has been involved in an incident offshore, even if full information is not available.

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[3] The definitions of EC and NOK are taken from the Collabro Vantage registration forms.

Primary IMT/RRT	The IMT/RRT of the company with 'primacy' for the incident: the primary IMT coordinates with the regulators and emergency services and provides regular updates to Support IMTs/RRTs mobilised by contracting companies.
Relative Response Team (RRT)	A team which handles calls from concerned members of the public in the event of an emergency. Led by a RRT Leader, who liaises with the HR contact within the IMT.

12.   Revision History

Revision	Date Published	Amendments
2.0	December 2020	Amendment to RRT call handling practices in relation to treatment of Close Relatives; introduction of 'Primary' and 'Supporting' RRT; update to call handling flowchart; inclusion of reference to Proactive Family Notification; addition of Data Protection and Revision History.
1.0	June 2016	-