

Turning Large Scale Organisational Change



Into a Safety Advantage



"If you wouldn't bypass your plant MoC process, why would you bypass it for a major organisational change?"

The Silent Saboteur in High-Hazard Transformations

In complex, high-stakes operations, it's rarely the obvious threats that bring you down – it's the slow, unseen erosion of safety and capability during major change. Without disciplined oversight, restructures can quietly dismantle your hazard controls, strain your top talent, and leave your organisation exposed. The danger isn't just operational: it can threaten your license to operate, your reputation, and your survival as a business.



In every industry, organisational change is inevitable. Shifts in market conditions, technology, and corporate strategy demand restructuring, cost optimisation, and new ways of working.

But for businesses that manage Major Accident Hazards (MAHs), including oil and gas, petrochemicals, energy, mining, and nuclear, the stakes are far higher. Here, a poorly managed restructure is more than a productivity dip; it can erode the very systems that prevent catastrophic events. The risk isn't just to safety, it's to production uptime, regulatory compliance, and corporate reputation.

That's why it's essential for executives to manage large-scale business transformations using a systematic Management of Change (MoC) process – the same discipline applied to plant and equipment changes. Senior management must demonstrate clear commitment from the outset, not just in speeches but by following their own policies and leading by example.

Too often, organisations bypass a formal MoC process for large-scale reorganization, despite having policies that require it. In some instances, no formal risk assessments are undertaken, and in others, the leaders opt to rely on the use of simple checklists. While these may suffice for small changes, they are rarely adequate for major transformations.



From my experience failure to follow a structured risk assessment process often leads to key risks going unnoticed, such as:



Loss of corporate knowledge/ memory as a result of change in personnel responsibilities or headcount reduction.



Loss of focus on critical safety issues during the transition and afterwards.



Overload of personnel in newly combined or redefined roles.



Gaps in competence or knowledge for safety-critical activities.



Reduced emergency response capability due to unclear roles and responsibilities.

“But the changes we’re making are not safety related”

This is a statement I often hear from senior leaders who are making large scale changes: the motivation for change is often commercial, not safety-related: simplifying or improving the organizational structure, realizing cost savings, making efficiency gains, or strategic repositioning. However, without a structured risk assessment process, safety implications can remain hidden until it’s too late. A robust MoC process surfaces these risks early, allowing leaders to mitigate them before they undermine hazard controls.

The HSE have written an information sheet titled “Organisational change and major accident hazards”^[1] in which they share an incident at Hickson & Welch in Castleford where fires killed five employees during the cleaning of a vessel containing potentially unstable sludge. The company had recently completed a reorganization, and afterwards the cleaning task had been organized by inexperienced team leaders reporting to an overworked area manager. The HSE incident report said: “Companies should assess ... the workload and other implications of restructuring ... to ensure that key personnel have adequate resources, including time and cover, to discharge their responsibilities”.



And it's not just good practice - it's a compliance requirement. In regulated MAH environments, organisational changes that could impact safety must be demonstrably assessed, managed, and documented. A structured process provides the audit trail regulators expect, proving that hazard controls have not been weakened in the pursuit of business change.

Applying plant-level change discipline to Organisational Design



Protecting MAH control demands the same rigour as when making plant or equipment changes or modifications. Principles of a good Management of Change process for large scale organisational changes include:

- *Being Fit for Purpose: driven by risk exposure*
- *Satisfying the needs of the different stakeholder groups*
- *Having ownership at all levels of the organisation*
- *Being auditable*
- *Having an approach that can be consistently applied across all parts of your business*

In one business transformation I was involved in we made a significant organizational change: restructuring the organisation and reporting lines, reducing the team size, and moving one team from England to Scotland. For large scale business transformations, such as this, I've found it best to integrate the Organisational MOC process with the Organisational design process. If you follow a stage gate design process, that means embedding safety assurance at each gate: Appraise, Select, Define, Execute and Operate. The focus is on progressively removing uncertainty and risk. This is achieved through five core assurance activities:

Activities

Understand
Asses Risk
Recommend



Appraise



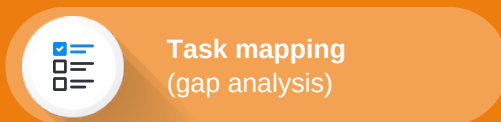
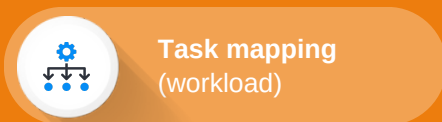
Understand
Asses Risk
Recommend



Select



Understand
Asses Risk
Recommend



Define



Review



Execute



Review



Operate



01 High Level Risk Assessment

Early in the change, identify all potential impacts on hazard control and business continuity. Use structured brainstorming, hazard ranking, and experience-based scoring to detect any “show-stopper” risks.

02 Scenario Testing

Stress-test the proposed organisation against real-world challenges: emergency response, production upsets, simultaneous operations, and the loss of key skills. Use both desktop and live exercises to prove capability before the new structure is embedded.

03 Sustainability Testing

Assess the proposed organisation’s ability to perform not just in the first month, but in the medium and long term. Benchmark against corporate safety and operational excellence frameworks (e.g. Safety Management System or Operating Management System) to ensure hazard control will hold under business-as-usual conditions.

04 Task Mapping (Workload and Gap Analysis)

Map every task from the old organisation to the new. Identify where work can be removed or streamlined, where overload risks exist, and where safety-critical tasks might be lost if not explicitly reassigned.

05 Integrated Decision Support

At every gate, collate findings into a documented decision support package (DSP) for leadership sign-off. This creates a clear audit trail that links organisational design choices to hazard management outcomes: a critical requirement for satisfying regulatory scrutiny.

This approach doesn’t slow change, it accelerates it safely, ensuring leaders make informed decisions, avoid hidden pitfalls, and retain control over their most important safety barriers.



The Non-negotiables for **Safe Change in Major Accident Hazard (MAH)** environments

Delivering a safe and effective organisational change programme in a MAH environment requires discipline in three key areas:

01 Governance and Sponsorship

- *Appoint a senior leader as the change sponsor, accountable for ensuring MAH control is a non-negotiable priority.*
- *Maintain a dedicated Management of Change (MoC) register for organisational changes, just as you would for plant changes.*
- *Ensure decision makers formally review organizational risks and approve mitigation plans before proceeding.*
- *Involve regulators early and maintain an open dialogue throughout the change.*

02 Resourcing and Competence

- *Allocate proportionate resources to the safety aspects of change: don't expect existing teams to manage transformation "off the side of their desk."*
- *Identify competence gaps early, particularly for roles in emergency response, hazard monitoring, and safety-critical maintenance. Ensure training or recruitment is complete before go-live.*

03 Monitoring and Assurance

- *Develop both transition KPIs (e.g., completion of training, activity mapping, emergency exercise outcomes) and sustainability KPIs (e.g., plant availability, maintenance backlog, safety audit frequency).*
- *Plan post-change reviews at defined intervals. Many of the most dangerous weaknesses only emerge six to twelve months after go-live.*

When executed well, these measures do more than protect safety, they drive operational clarity, optimise resources, and strengthen organisational resilience.

But what if I've gone live with an organizational change and haven't risk assessed it?

My recommendation is not to put your head in the sand and ignore it, but take action to rectify the situation. A retrospective assessment is better than no assessment and involves the following:

- 1. Document what changes have been made.*
- 2. Conduct a high level risk assessment.*
- 3. Identify where your highest risks are, if any, and decide whether to conduct Scenario testing, Sustainability testing, or Task Mapping.*
- 4. Document your decisions and update your risk registers, if required.*

Conclusion

Change that Strengthens your License to Operate

In Major Accident Hazard industries, organisational change is not just a business exercise, it's a direct intervention into the systems that prevent catastrophic events. Leaders who apply a stage-gated, assurance-driven process with high level risk assessment, scenario testing, sustainability testing, and task mapping embedded can deliver transformation without undermining their hazard controls.

By demonstrating visible commitment, following company policies, and building a defensible audit trail, executives not only protect people, assets, and the environment, they strengthen their organisation's license to operate. In this world, change doesn't just avoid compromising safety, it becomes an opportunity to improve it.

References

[1]. **HSE information sheet** – Organisational change and major accident hazards – Chemical Information Sheet No CHIS7

