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| ONR Technical Inspection Guide (TIG)  LC 9 – Instructions to persons on site |



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LC 9 – Instructions to persons on site

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Revision commentary

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| Issue | Description of update(s) |
| 7 | Major update - addition of foreign languages, general update.  Review date extended to March 2027. |
| 7.1 | Minor update - Document simplified/duplication removed, no major change to outcomes or intent. |

# Introduction

1. Technical Inspection Guides (TIGs) assist inspectors in making regulatory judgments and providing advice on Licence Conditions (LCs). Most LCs are goal-setting, leaving the specifics of arrangements to the dutyholder, who is ultimately responsible for safety. However, Licence Condition (LC) 9 is one of the LC’s which do not formally require the licensee to make and implement adequate arrangements.
2. LC 9, along with LC 8 [1], is more prescriptive, using the term ‘**shall ensure**’. Both ONR and the licensee must clearly understand the adequacy of systems for delivering proper instructions to site personnel.
3. This guidance provides a framework for inspectors to judge compliance with LC 9 – Instructions to Persons on Site, though it is neither exhaustive nor mandatory.
4. Inspectors should also refer to the ONR procedure on Risk-Informed and Targeted Engagements (RITE) [2], which guides risk-based prioritisation in regulatory interventions and supports decisions on engaging with dutyholders.

# LC 9 – Instruction to persons on site

1. The licensee shall ensure that every person authorised to be on the site receives adequate instructions (to the extent that this is necessary having regard to the circumstances of that person being on the site) as regards the risks and hazards associated with the plant and its operation, the precautions to be observed in connection therewith and the action to be taken in the event of an accident or emergency on the site.

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# Purpose and outcomes of LC 9

1. The purpose of LC 9 is to ensure that the licensee provides all people on the site with sufficient information in relation to their activities on the site.
2. The regulatory outcomes being sought by LC 9 are that all persons authorised to be on site receives adequate instruction with regards to:

* the risks and hazards (including security if appropriate) associated with the plant and its operation.
* the appropriate precautions to be observed whilst on site.
* response to an incident or emergency situation thus minimising delay.

1. LC 9 does not explicitly require formal arrangements, it does place an absolute legal duty on the licensee to provide adequate instructions. This requirement is not subject to reasonable practicability. LC 9 aligns with other statutory duties ensuring people on site receive suitable instruction, training, and supervision, including:

* [Sections 2(2)(c)](https://www.legislation.gov.uk/ukpga/1974/37/section/2) and [3(3)](https://www.legislation.gov.uk/ukpga/1974/37/section/3) of Health and Safety at Work etc. Act 1974,
* [Regulation 10](https://www.legislation.gov.uk/uksi/1999/3242/regulation/10/made) of the Management of Health & Safety at Work Regulations 1999
* [Regulation 15](https://www.legislation.gov.uk/uksi/2017/1075/regulation/15/made) of the Ionising Radiations Regulations 2017

1. The licensee should in particular ensure consideration is given to:

* the category of the person(s) e.g. new staff, contractors, delivery drivers. visitors
* whether the person(s) are escorted by experienced personnel
* the site location of the person(s)
* if the media and language used for the information is suitable.

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# Guidance on inspection of instructions for LC 9

1. While LC 9 does not mention arrangements directly, licensees should have a management system that demonstrates compliance. Here, "arrangements" refers to the formal system used to ensure that adequate instructions are created and communicated.
2. The following provides ONR’s views on what the licensee’s arrangements might be expected to contain to comply with LC 9:
   1. that LC requirements should be readily available and extant, signed by an appropriate senior manager and controlled under a system compliant with the requirements of LC17 – Management Systems [3]
   2. informed by the information addressing the requirements of LC 16 - Site plans, designs and specifications [4].
   3. that all persons on the site have been given appropriate instruction on the risks, hazards and responses necessary, during normal operations and potential accidents or emergencies. The arrangements should address any precautions that need to be observed in the event of any accident or emergency situation and could possibly vary depending on the person(s) location.
   4. that instructions are given to new staff, delivery drivers, contractors and visitors and that refresher training is also given at appropriate intervals.
   5. that authorised casual visitors who do not meet normal training requirements are escorted when on the site.
   6. that records of relevant training are made, controlled and kept under the arrangements made for LC 6 (Documents, records, authorities and certificates) [5].
   7. that the instruction is in an appropriate media form and language for the person(s). Person(s) understanding should be verified
3. For inspectors in judging the adequacy of the licensee’s instructions. The following is guidance:
   1. Check that documents demonstrating compliance with LC 9 are in place.
   2. Review the compliance arrangements to ensure they align with the site’s instructions and emergency plan. Verify that recent updates are reflected, responsible persons are correctly identified, and quality assurance measures are followed. Confirm that any changes have been properly incorporated and validated.
   3. Check that information from LC 16 [4], especially regarding buildings and plant affecting safety, is appropriately incorporated into the LC 9 arrangements and informs their development.
   4. Ensure that induction information matches the site's hazard level, risk, and emergency arrangements, taking into account whether access is unescorted or restricted.
   5. Check all persons on the site receive appropriate instructions during their time on the site. Confirm that they address the differing requirements e.g. of new staff, contractors, as well as suitable refresher training where necessary. The instruction media and language used should be suitable for the person(s) and understanding could be sampled by questioning or attending induction(s).
   6. Check escorts have an adequate knowledge of the hazards, risks and emergency arrangements associated with the location for which they are providing the escort duties.
   7. Confirm that records of relevant training and instruction and check that there is suitable cross reference to, and consistency with, the arrangements for LC 6 [5], LC 10 (Training) [6] and LC 11 (Emergency arrangements) [7].

# References

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| [1] | ONR, “Licence Condition 8 Warning Notices Technical Inspection Guide (NS-INSP-GD-008)”. |
| [2] | ONR, “Risk Informed and Targeted Engagements (ONR-RD-POL-002)”. |
| [3] | ONR, “Licence Condition 17 Management Systems Technical Inspection Guide (NS-INSP-GD-017 )”. |
| [4] | ONR, “Licence Condition 16 Site plans, designs and specifications (NS-INSP-GD-016)”. |
| [5] | ONR, “Licence Condition 6 Documents, records, authorities and certificates (NS-INSP-GD-006)”. |
| [6] | ONR, “Licence Condition 10 Training Technical Inspection Guide (NS-INSP-GD-10)”. |
| [7] | ONR, “Licence Condition 11 Emergency Arrangements (NS-INSP-GD-011 )”. |