Health and Safety - Confined Spaces Procedure

Section 1 - Purpose / Objectives

(1) This Procedure outlines the safety arrangements applying to "Confined Spaces" in Victoria University campuses.

(2) The objective of this Procedure is to ensure entry and works in confined spaces are conducted as far as is reasonably practicable without risks to safety and health.

Section 2 - Scope / Application

(3) This Procedure applies to:

a. All campuses.
b. Employees, staff or contractors entering confined spaces for whatever purpose.

Section 3 - Definitions

(4) Competent Person

(5) Confined Space – A space in any vat, tank, pipe, duct, flue, oven, chimney, silo, reaction vessel, container, receptacle, underground sewer, shaft, well, trench, tunnel or other similar enclosed or partially enclosed structure, if the space:

a. is, or is intended to be, or is likely to be, entered by any person; and
b. has a limited or restricted means for entry or exit that makes it physically difficult for a person to enter or exit the space; and
c. is, or is intended to be, at normal atmospheric pressure while any person is in the space; and
d. contains, or is intended to contain, or is likely to contain:
    i. an atmosphere that has a harmful level of any contaminant; or
    ii. an atmosphere that does not have a safe oxygen level; or
    iii. any stored substance, except liquids, that could cause engulfment.
    iv. but does not include a shaft, trench or tunnel that is a mine or is part of the workings of a mine.

(6) Confined Space Entry Authorised Person (CSEAP)

(7) Confined Space Entry Permit

(8) Entry (confined spaces) – When a person's head i.e. the breathing zone, or upper body is within the boundary of the confined space (NB - Inserting an arm for the purpose of atmospheric testing is not considered an entry to a confined space).

This policy document may be varied, withdrawn or replaced at any time. Printed copies, or part thereof, are regarded as uncontrolled and should not be relied upon as the current version. It is the responsibility of the individual reading this document to always refer to Victoria University's Policy Library for the latest version.

(9) Safe Work Method Statement (SWMS)

Section 4 - Policy Statement

(10) Nil

Section 5 - Procedures

Part A - Roles/Responsibilities

Roles	Responsibility
Associate Director Facilities Management	- Responsible for the management of the permit to work system at VU. - Is an authorised person and will authorise other persons with appropriate competency, skill and authority to issue permits. - Ensure all nominated authorised persons have been trained in this Procedure. - Ensure all nominated authorised persons have completed confined space entry training (including refresher training) and are competent to supervise person(s) entering a confined space.
Security Team	- Issue access devices — keys and fobs — to contractors. - Assist in prevention of unauthorised access by third parties to confined spaces and in particular to confined spaces when in use as a workplace.
Confined Space Entry Authorised Person — normally Facilities Supervisor /Manager (CSEAP)	Ensure before issuing a confined space entry permit that: - Alternatives to confined space entry have been exhausted by the initiating manager or contractor. - Risk assessment is conducted and satisfactorily addresses risks of entry. - All persons entering the space or acting in a standby capacity are competent to do so AND have completed confined space training. - Be familiar with the intended task(s) and ensure the risk assessment (or SWMS) addresses entry risk into the specific space. - Communications enable uninterrupted contact. - Signage and access restrictions suffice to deter unauthorised access. - Emergency procedures are appropriate, robust and rehearsed. - Ensure entry and exit times are observed and communicated. - Validate that contractors are working in accordance with their SWMS / Risk Assessment, in at least 5% of permits issued. This will ensure that all contractors SWMS / Risk Assessments are validated over time.
OHS Team	- Audit and monitor application of confined space procedure including issue of confined space entry permits and the currency of the confined space register.
Contractors	- Ensure all staff under their control, working in and/or around confined spaces are competent AND have completed training in confined space entry (this includes sub-contractors). This training must be renewed at least every 2 years. - Create and review of the risk assessment (or SWMS). - Ensure risk controls are adequate and in place throughout the confined space entry.
Initiating Manager	- Before considering confined space entry do everything reasonably practical to eliminate the need to conduct confined space work. - Initiate a works request for a suitable contractor.
Facilities	- Maintain the confined space register (including updating it with any additional confined spaces or removing them as a result of any changes to VU facilities). - Maintain signage on confined spaces. Maintain security of access to confined spaces. Ensure that work orders for work to occur in a confined space are referred to a Confined Space Entry Authorised Person for issue of a confined space entry permit. - Determine that contractors are competent (completed confined space training) and do not access confined spaces without a confined space entry permit. - Maintain for a period of 30 days copies of confined space entry permits that have been issued. - Maintain copies of completed confined space risk assessments for a period of up to 2 years.

This policy document may be varied, withdrawn or replaced at any time. Printed copies, or part thereof, are regarded as uncontrolled and should not be relied upon as the current version. It is the responsibility of the individual reading this document to always refer to Victoria University's Policy Library for the latest version.

Part B - Procedures

(11) NOTE: At all times confined space entry person(s) must be competent to undertake this activity. Competency at VU includes appropriate training in confined space entry, with refresher training conducted at least every 2 years. VU's preference is that confined space entry is outsourced to contractors who routinely perform confined space work, to ensure high levels of capability and safe systems of work.

Confined Spaces Register

(12) A confined space register will be maintained by facilities. Any department of the University that acquires a device or structure that falls within the definition of a confined space will provide written notice of the location and characteristics (including use, purpose and maintenance requirements) of the confined space to facilities so the register may be kept up to date.

(13) The register will be made available by facilities to workers or contractors who may work on, in or adjacent to the space.

Signage and Labelling

(14) Any space that is listed in the confined space register will have signage on or adjacent to the entry to the space. The signage will indicate that the space is a confined space and entry is prohibited unless a confined space entry permit has been granted. Maintenance of signage on fixed building items is the responsibility of facilities. Maintenance of signage or labelling on non-fixed structures or devices will be the responsibility of the manager with responsibility for the structure or device.

Secure Entry

(15) Any space that is listed in the confined space register will be secured from casual or unauthorised entry. A gatic lid is considered a secure entry to a pit. If entry to a device or structure such as a duct or a tunnel is within a locked room or structure, this will be considered a secured entry — so long as signage or labelling is at the actual point of entry to the device or structure. If a door or other entry point to a confined space is not within a secured room it must be secured with a lock or padlock at each entry point.

Risk Assessment

(16) A risk assessment must be undertaken by a competent person or persons before work associated with the confined space is carried out. The ' Confined Space Risk Assessment ' form must be completed and revised whenever there is evidence to indicate that it is no longer valid. Where multiple similar confined spaces in which similar work is performed are present and the risk factors are identical, a generic risk assessment may be appropriate.

(17) If the risk assessment identifies risk to health or safety from work in a confined space, the risk must be eliminated or, if this is not practicable, minimised by the implementation of appropriate risk control measures. The risk controls measures must be documented on the ' Confined Space Risk Assessment ' form or the contractors SWMS (as long as the SWMS's reflects the same requirements as this form - as a minimum).

(18) No person shall enter a confined space to conduct atmospheric testing or monitoring without a confined space entry permit.

(19) No person shall enter a confined space unless:

a. The current risk assessment has been reviewed/ updated and continues to be valid;
b. A CSEAP provides a confined space entry permit to, the person responsible for DIRECT CONTROL of the work in the confined space;

c. The written authority includes any control measures or precautions necessary for the safe entry and execution of the work;
d. They are advised of, understand and comply with the requirements of the written authority; and
e. A record of their presence in the confined space is maintained.

(20) Where it is not technically feasible to ensure an oxygen level in the atmosphere greater than 19.5%, or the atmospheric contaminants cannot be reduced to below the relevant exposure standards, no person shall enter the confined space unless they are equipped with suitable breathing apparatus.

Initiating work in a confined space

(21) Before arranging an entry into a space or structure that has been labelled a confined space, the manager initiating the work permit or arranging for the work to take place must first consider all available alternatives that eliminate or reduce entry into the confined space. For example; if a water pump inside a confined space has ceased working then turning off the water from outside the space eliminates the need for one entry. Having the pump winched out of the space and then worked on above ground reduces the amount of time spent during an entry. By considering such alternatives the initiating manager reduces risk and achieves a greater level of compliance.

Confined Space Entry

(22) A confined space entry permit may only be issued by a Confined Space Entry Authorised Person (CSEAP) appointed by Associate Director Facilities Management.

(23) A CSEAP may not issue a ' Confined Space Entry Permit ' until the CSEAP has completed an appropriate course of training. A CSEAP will most often work within facilities management. A CSEAP may not issue a confined space entry permit until:

a. Satisfied alternatives to entry have been fully explored and any entry will be for as short a time as is practicable.
b. They are satisfied there is a completed confined space risk assessment (and / or SWMS) that identifies and controls various hazards and risks inherent in entry into the particular confined space.
c. The risk assessment (and / or SWMS) particularly addresses that space, task, date and conditions.
d. The risk controls noted in the risk assessment / SWMS are in place and functional — including communications and emergency procedures, robust restriction of third parties from the entry point, and other permits are also issued — e.g. hot work permit.
e. The person or persons entering the confined space or acting as standby persons have received accredited confined space training and hold current certification.
f. Confident the provisions of the permit will be communicated to the person or persons entering the confined space or acting as standby persons.

(24) A confined space entry permit must include provision for the time of entry and the time of exit which will be confirmed by the Confined Space Entry Authorising Person before the departure from site of those engaged in the confined space entry.

Confined Space Entry Permit

(25) A ' Confined Space Entry Permit' must be completed for every confined space entry, unless the entry is by an emergency service during a confined space rescue. A confined space entry permit may only be issued by an appropriately trained authorised and appointed CSEAP. A single permit may only be used for the day of issue but may be used for multiple entries into a space within one day and may be used where there is more than one access point into a single space. A single permit may not be used for entry into multiple spaces or for entries on multiple days.

(26) The confined space entry permit will detail:

a. The location and description of the confined space to which the permit applies.
b. The results of pre-permit atmospheric testing.
c. The hazards and measures to control the risk of those hazards:
    i. List the control measures that need to be implemented before work commences. These may include the isolation of plant and services, purging, ventilation, atmospheric testing, cleaning and signage, communications and emergency procedures.
    ii. List the control measures that need to be implemented or continued while work is being done in the space. These may include ventilation, continuous monitoring, Respiratory Protective Equipment and Personal Protective Equipment.
    iii. List any equipment to be taken into the confined space, including any exclusions such as ignition sources.
    iv. List any specialist emergency rescue equipment required.

(27) The name of any employee permitted to enter the space.

(28) The name of any standby person assigned to the space.

(29) The period of time that the permit is in operation — no longer than 24 hours.

(30) The permit needs to be re-validated if the person with direct control of work in the space changes, a break in work continuity occurs, changes are made to the work that introduce hazards not addressed by the current permit, or new risk controls are needed.

(31) The entry permit needs to be displayed in a prominent place to facilitate signing and clearance. A copy of the entry permit is normally displayed at the entry point where the standby person is stationed.

(32) A confined space entry permit must include provision for the time of entry and the time of exit which will be confirmed by the Confined Space Entry Authorising Person before the departure from site of those engaged in the confined space entry.

Facilities

(33) Facilities Unit will:

a. Maintain the confined spaces register and associated risk assessments.
b. Maintain legibility of signage on confined spaces.
c. Maintain security of access to confined spaces.
d. Ensure work orders are scrutinised to ensure work orders involving work in a confined space are recognised and referred to a CSEAP for issue of a confined space entry permit.
e. Determine that contractors do not access confined spaces without a confined space entry permit.
f. Record details or copies of contractors' competencies to enter confined spaces e.g. training records.
g. Ensure Confined Space Entry Authorising Persons have appropriate training and follow this Procedure and their training in the issuing of confined space entry permits.
h. Maintain for a period of 30 days copies of confined space entry permits that have been issued.

Managers

(34) All managers with respect to staff, contractors and equipment in their area of responsibility will:

This policy document may be varied, withdrawn or replaced at any time. Printed copies, or part thereof, are regarded as uncontrolled and should not be relied upon as the current version. It is the responsibility of the individual reading this document to always refer to Victoria University's Policy Library for the latest version.

a. Ensure no entry is made by staff or contractors into signed or labelled confined spaces unless that entry is authorised by an entry permit signed by a Confined Space Entry Authorised Person.
b. Advise Facilities and the OHS Team if a structure or device is purchased or utilised that may be deemed, or should be assessed as to whether it may be, a confined space.

OHS Team

(35) The OHS Team will:

a. Ensure register of confined spaces is created and maintained.
b. Periodically audit the operation of confined spaces procedure including:
    i. Training of CSEAP
    ii. Issue of entry permits
    iii. Adequacy of risk assessments and / or SWMS

Security

(36) Security Officers have no direct role in confined space entry beyond their:

a. Involvement in contractor management through the issue of access keys and fobs.
b. Control of access to secured buildings and facilities- including secured confined spaces.
c. Control of traffic during emergency procedures.

(37) Security Officers will under no circumstances enter a Confined Space in an emergency to rescue persons within the space.

Training and Competency

(38) All persons with work activities related to a confined space shall be trained and assessed as competent to perform those activities. Persons shall be reassessed or complete refresher training every 2 years to ensure their ongoing competency to perform activities relevant to their entry and work associated with confined space.

(39) Training shall include:

a. The hazards of confined spaces.
b. Assessment procedures.
c. Control measures.
d. Emergency procedures.
e. The selection, use and maintenance of safety equipment.

Section 6 - Guidelines and Forms

(40) Confined Space Risk Assessment Form

(41) Confined Space Entry Permit

Status and Details

Status	Historic
Effective Date	4th September 2015
Review Date	30th November 2018
Approval Authority	Vice-Chancellor
Approval Date	27th August 2015
Expiry Date	15th October 2018
Accountable Officer	Lisa Line Deputy Vice-Chancellor Enterprise and Digital Lisa.Line@vu.edu.au
Responsible Officer	Kirsten Jeffery Chief Infrastructure Officer 9919 5145
Enquiries Contact	Workplace Relations and Safety

Glossary Terms and Definitions

"Safe Work Method Statement (SWMS)" - A document that identifies the steps in a task, the hazards involved in performing the tasks and the risk controls to be applied to eliminate or reduce risks involved in a task.

This policy document may be varied, withdrawn or replaced at any time. Printed copies, or part thereof, are regarded as uncontrolled and should not be relied upon as the current version. It is the responsibility of the individual reading this document to always refer to Victoria University's Policy Library for the latest version.