Health and Safety - Confined Spaces Procedure

Section 1 - Summary

(1) This Procedure outlines the safety arrangements applying to "Confined Space management and entry" at Victoria University (VU) 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 - Accountability

Accountable/Responsible Officer	Role
Accountable Officer	Chief Human Resources Officer
Responsible Officer	Senior Manager, Health Safety & Wellbeing

Section 3 - Scope

(3) This Procedure applies to:

a. All VU campuses and locations.
b. Staff, contractors or any person entering a confined space for any purpose.

Section 4 - Definitions

(4) Competent Person: A person who has, through a combination of training, education and experience, acquired knowledge and skills enabling that person to perform correctly a specified task.

(5) Confined Space: An enclosed 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; an
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:

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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; but
iv. 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).

(9) 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.

Section 5 - Policy/Regulation

(10) Health and Safety Policy.

Section 6 - Procedures

Part A - Summary of Roles and Responsibilities

Roles	Responsibility
Director, Operations and Planning	- Is 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, site knowledge 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.
Director, Capital Projects, Planning & Asset Utilisation	To ensure as far as is practicable during project design that confined spaces are not created. If not practicable that; - that the need for any person to enter the space is eliminated: if not practical; - risks of entry are reduced as far as is practicable.
Director Trades Technical Services Team Leader Associate Directors of Research College Deans	To ensure as far as is practicable for designed or purchased plant that: - confined spaces are not created, if not practicable that - the need for any person to enter the space is eliminated, if not practical - risks of entry are reduced as far as is practicable.
Security Team	- Issue access devices — keys and fobs — to contractors who are approved and entered into the VU Contractor management system and nominated by VU authorised person for the task. - Assist in prevention of unauthorised access by third parties to confined spaces and in particular to confined spaces when in use as a workplace.

Roles	Responsibility
Confined Space Entry Authorised Person — normally Facilities Supervisor /Manager (CSEAP)	Before issuing a confined space entry permit ensure that: - Alternatives to confined space entry have been exhausted by the initiating manager or contractor. - A Confined Space Risk assessment is conducted, documented and controls satisfactorily address risks of entry and exit of the space. - Emergency procedure, Rescue plan and First Aid arrangements are appropriate, robust and rehearsed. - All persons entering the space or acting in a standby capacity are competent to do so AND have completed accredited confined space training which is current. - Be familiar with the intended task(s) and ensure the risk assessment and Confined Space Permit address entry risk into the specific space. - Communications enable uninterrupted contact between standby person/s and entrant/s. - Signage and access restrictions suffice to deter unauthorised access. - Ensure entry and exit times are observed and recorded on the Confined Space Permit. - Validate that contractors are working in accordance with the Confined Space Permit. - Record and investigate any breaches of this Procedure.
OHS Team	- Audit and monitor application of Confined Space Procedure including issue of confined space entry permits the currency of the confined space register, and adequacy of confined space risk assessments, air monitoring and rescue plans.
Contractors	- Ensure all staff under their control, working in and/or around confined spaces are competent AND have completed accredited training in confined space entry (this includes sub-contractors). This training must be renewed at least every 2 years. Evidence of this must be provided to the site Facility Manager prior to works commencing. - Provide a confined space risk assessment prior to work commencing. - Ensure risk controls are adequate and in place throughout the confined space entry. - Ensure Emergency Response, Rescue Plan, required rescue equipment and First aid arrangements 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. - Ensure the confined space risk assessment is documented and reviewed with the contractors prior to entry. - Ensure that the CSAEP initiates the confined space entry permit and reviews this with the contractors prior to entry. - Ensure that Emergency and rescue plans are documented and equipment to be used is maintained in suitable condition for any rescue.
Facilities Operations	- Maintain the confined space register (including updating this register with any additional or removed confined spaces of any changes to VU facilities). - Maintain signage on confined spaces in a clear and legible condition. - Maintain security of access to confined spaces. - Ensure that work orders for work to occur in a confined space are flagged and referred to a Confined Space Entry Authorised Person for issue of a confined space entry permit and rescue plan. - Maintain a centralised document control system for confined space risk assessments so that they can be reviewed and reused for frequently entered spaces. - Ensure that contractors are competent (i.e. completed accredited confined space training) and do not access confined spaces without completion of the confined space risk assessment, confined space entry permit and confined space rescue plan. - Retain in a central location completed confined space entry permits and their risk assessments for the designated period.

Part B - Procedures

(11) NOTE: At all times, a person entering a confined space entry must be competent to undertake this activity. Competency at VU includes appropriate accredited training in confined space entry, with refresher training conducted at least every 2 years.

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 shall 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 is 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 access cover 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 documented confined space 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 and Rescue Plan must be completed and revised whenever there is evidence to indicate that it is no longer valid.

(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 and Rescue Plan or the contractors SWMS (the SWMS's must cover the same requirements as the Confined Space Risk Assessment and Rescue Plan - as a minimum). A copy of the Contractor SWMS must be retained with the retained confined space entry permit.

(18) Initial atmospheric testing, completed by a competent person using a calibrated instrument shall commence from outside the space.

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

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

a. The current confined space risk assessment and emergency plans have been documented, reviewed/ updated and continue 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 confined space permit 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 documented confined space permit;

and

e. A record of their presence in the confined space is maintained.

(21) 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 before or during work, no person shall enter the confined space unless they are equipped with suitable breathing apparatus.

Initiating Work in a Confined Space

(22) 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.

Confined Space Entry

(23) A Confined Space Entry Permit may only be issued by a Confined Space Entry Authorised Person (CSEAP) appointed by the Director, Operations and Planning.

(24) A CSEAP may not issue a Confined Space Entry Permit until the CSEAP has completed accredited confined space training and this training is current. A CSEAP will most often work within facilities management. A CSEAP may not issue a confined space entry permit until:

a. They are 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 documented confined space risk assessment (or equivalent SWMS) that identify and control various hazards and risks inherent in entry into the particular confined space.
c. The confined space risk assessment (and / or SWMS) is specific for the space to be entered, the task/s , and conditions.
d. They have emergency procedures, a documented rescue plan and appropriate rescue equipment in place. At least one person on the job shall have current First Aid training which includes cardio pulmonary resuscitation (CPR).
e. They are satisfied that the space is fully isolated from introduction of any substance and relevant sources of energy or movement are locked out.
f. They are satisfied that the atmosphere in the space has appropriate oxygen levels and potential airborne exposures are removed or controlled by use of appropriate respiratory protection. This includes consideration of potential gases or airborne substances generated by the work.
g. There are satisfied that the risk of fire or explosion is eliminated or appropriately controlled.
h. The risk controls noted in the confined space 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.
i. The person or persons entering the confined space or acting as standby persons have received confined space training which is current.
j. They have reviewed and are satisfied that the provisions of the confined space permit will be communicated to the standby person/s and entrant/s and identified controls will be applied.

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 and accredited 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 provided all entry and exit names and times are recorded and a hazard review is completed should conditions or work change. 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 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 protection and personal protective equipment.
    iii. List any equipment to be taken into the confined space, including any exclusions from the space such as ignition sources.
    iv. List any specialist emergency rescue equipment required.
d. The name of any employee permitted to enter the space.
e. The name of any standby person assigned to the space.
f. The period of time that the permit is in operation — this shall be no longer than 12 hours.

(27) The confined space entry permit and risk assessment shall be revised and re-validated if -

a. the person with direct control of work in the space changes, or
b. a break in work continuity occurs, or
c. changes are made to the work that introduce hazards not addressed by the current permit, or
d. new risk controls are needed.

(28) The confined space entry permit and the risk assessment shall be displayed in a prominent place at the entry point where the standby person is stationed.

(29) A confined space entry permit must record the names and times of entry and exit which will be confirmed by the CSEP before the departure from site of those engaged in the confined space entry.

Facilities

(30) Facilities Unit will:

a. Maintain the confined spaces register and associated confined space 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 CSEAP’s have current accredited training and follow this Procedure and their training in the issuing of

confined space entry permits.

h. Retain for a period of 30 days confined space entry permits and risk assessments that have been issued.
i. Retain for a period of two years any confined space entry permit where a notifiable incident (i.e. a person has been seriously injured or suffered health effects) has occurred during the work.

Managers

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

a. Report and identify any potential confined spaces to Facilities.
b. 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 CSEAP.
c. 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

(32) The OHS Team will:

a. Support facilities to ensure a register of confined spaces is created and maintained.
b. Periodically audit the operation of confined spaces procedure including:
    i. Training of CSEAP's;
    ii. Adequacy and issue of confined space entry permits;
    iii. Adequacy of confined space risk assessments and / or SWMS.

Security

(33) 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.
d. Liaise with emergency services should this be required.

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

Training and Competency

(35) All persons with work activities related to a confined space shall be trained and assessed as competent to perform those activities. Persons shall complete accredited confined space entry permit training and maintain this training as required to ensure their ongoing competency to perform activities relevant to their entry and work associated with confined space.

(36) 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 7 - Guidelines

(37) Nil.

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