

## **PERMIT TO WORK SYSTEM**

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**Procedure Designation: Non-core Audience: Operational Employees and Contractors**

**Review Period: 2yrs**

### **1. PURPOSE**

The purpose of this document is to define a minimum safe system for work being performed at sites controlled by the Kimberley Ports Authority (**KPA**) to ensure a high standard of protection for people, environment and property.

This document is used to plan and control work which is considered potentially hazardous, to ensure a common understanding between KPA management, employees, berth users, other port users and contractors who perform the work.

The main objectives of the permit to work (**PTW**) system are to:

- ensure that all non-routine or hazardous work conducted on KPA controlled sites is conducted in a manner which is safe;
- ensure all works are coordinated to avoid conflicting activities to maintain a safe working environment;
- ensure that the applicant accepts all responsibilities associated with the safe execution of works for which the permit is issued, ensures that the work area has been inspected, identifies existing and potential hazards, ensures that any equipment used is fit for purpose and ensures all necessary precautions have been considered before the work is authorised;
- ensure that persons undertaking work have appropriate competencies; and
- ensure that after work has been completed that the work site has been left in a safe condition.

### **2. SCOPE**

The PTW system covers all non-routine or potentially hazardous work performed by an employee, contractor or port user in all KPA controlled areas.

This PTW system is not to be used as an access control system. Access to the site will be in accordance with the KPA Maritime Security Plan.

This permit does not cover any additional requirements by the vessel owner/master to meet their safety management system requirements.

### **3. DEFINITIONS**

**Job Hazard Analysis (JHA):** a written description of the task which outlines the steps in the task and the safety and environmental controls and precautions that will be implemented. For the purpose of this procedure a description of the job with appropriate controls may be a JHA, risk assessment, safe operating procedure or other similar document.

**Non-routine or hazardous task:** a task undertaken for the first time, a task infrequently undertaken or a task with inherent hazards or risks that has the potential for a safety or environmental impact or incident.

**Permit:** a document authorising a person to undertake specific work in a designated area.

**Permit authoriser:** a KPA employee who is authorised to issue a permit.

**Permit applicant:** a person/company who is undertaking work who requires authorisation. The applicant completes the permit form and is required to comply with the KPA permit to work (PTW) system.

**Permit to work system:** the system where permits are required, completed and authorised.

### **4. ROLES AND RESPONSIBILITIES**

To ensure the PTW system is effective, all individuals involved must clearly understand and take an active role in meeting their responsibilities. All employees and port users must bring any unsafe act or condition during the operation of a permit they are aware of to the attention of the personnel performing the work and the permit authoriser. All personnel have the right and duty to stop the job if they feel that it is unsafe to continue

OSH responsibilities are outlined in KPA's OSH Policy. Due to the potential hazards associated with PTW system, the specific responsibilities outlined below must also be followed.

#### **4.1. Permit Authoriser**

The permit authoriser must be a KPA employee and no person shall be both the permit authoriser and the applicant for any given work.

The maintenance department are responsible for authorising and issuing all permits for land side and they must ensure that there are no conflicting activities with wharf or marine side activities.

The operations department are responsible for authorising and issuing all wharf, marine side and slipway permits and they must ensure there are no conflicting activities with any land side permits.

For KPA employees requiring forklift Workbox permits or Crane cage for transporting personnel between wharf and vessel or vessel and wharf, the shift supervisor is authorised to issue these permits.

It is the responsibility of the permit authoriser to:

- authorise the permit;
- ensure there are no conflicting activities; and
- ensure that all permits are issued in accordance with this procedure.

#### ***4.2. Permit Applicant***

Permit applicants must:

- ensure that all requirements specified in this procedure are met;
- fill out the permit in detail and with accurate information to ensure the authoriser has a sufficient understanding of the activity being undertaken; and
- ensure work is conducted in a safe manner and in accordance with relevant legislation, standards, Codes of practice and Industry best practice as a minimum.

## **5. PERMIT TO WORK PROCESS**

### ***5.1. Permit Types***

KPA requires a permit to be submitted for the works identified in the table below, in order to gain authorisation for the work to commence. Further information about the type of work covered in a permit and the required supporting information and documentation can be found on the specific permit. Permit forms are available on the Kimberley Ports Authority website: <http://www.kimberleyports.wa.gov.au/>.

Table 1: Permit to Work types

<b><u>KPA PERMITS</u></b> <b>are Compulsory for the</b> <b>following prohibited activities.</b>	<b>All Vessels in Port</b> <b>Waters</b>	<b>Third</b> <b>Contractors</b> <b>jurisdiction</b>	<b>Party</b> <b>KPA</b>	<b>KPA Works</b>
Bunkering Permit	✓	✓		✓
Hot Work Permit	✓	✓		✓
Confined Space Entry Work Permit	Notify Port	✓		✓
Electrical Work Permit	NA	✓		✓
High Voltage Permit	NA	✓		✓
Excavation and Penetration Permit	NA	✓		✓
Working at Height / Over the Side Permit	Notify Port	✓		✓
Diving Permit	✓	✓		✓
Abrasive Blasting and Spray Painting Permit	✓	✓		✓
General Work Permit*	✓	✓		✓
Launching of Life Boats or Rescue Craft other than for an emergency	Request permission Port	Request permission Port		Request Port permission
Immobilise Main Engine	Request permission Port			

\*General Work permits are required for any work to be performed that is identified as non-routine maintenance work with safety and environmental hazard potential, e.g. high pressure water jetting, removal of handrails/gratings/fixed ladders, pressure testing (all situations), any work involving spraying pesticides or insecticides, any work being conducted at the slipway and launch and retrieve of vessels from the slipway.

If in any doubt about permit type notify or clarify with Port Operations (for wharf and marine side permits) or Maintenance department (for landside and slipway permits).

### **5.2. Job Hazard Analysis for tasks**

Any work requiring a permit is considered to have a different risk when compared to routine work. Each work activity requiring a permit also requires an approved JHA supporting the works associated with the permit.

For KPA employees and KPA contractors the JHA will be approved by a nominated responsible person, for example a KPA employee, supervisor or manager.

For third parties applying for a permit the relevant document e.g. JHA, is to be approved by the company/representative and available on request. The permit authoriser may choose to review the JHA as required.

### **5.3. Applying for permits**

The person performing the work, or their supervisor/company representative, will endeavor to apply for the permit 24 hours prior to the commencement of the work. If the person undertaking the task is unable to apply for the permit, then a representative who is responsible for the work can fill it out on their behalf. The representative must then ensure the person performing the work is aware of the contents of the permit and ensure they have a copy of the permit and supporting documentation with them at the job site.

For landside permits, these will be submitted to, and authorised by, the maintenance department at the Engineering Office prior to activities commencing.

For wharf, marine side and slipway permits, these will be submitted to, and authorised by, the operations department at the Operations Office or email to [operations@kimberleyports.wa.gov.au](mailto:operations@kimberleyports.wa.gov.au) prior to activities commencing.

Note: for KPA employees applying for permits, these permits will be applied where possible the day before in consultation with the Supervisor of the work and will be signed off by a Permit Authoriser where possible the day before or on the day.

For hot work, confined space and bunker permits these can be booked in advance, however, they will be authorised by the KPA at approx. 1400 the day prior to the planned commencement of works to avoid conflict with other activities.

When completing the permit the applicant must:

- clearly specify the nature, location and estimated duration of the work;
- ensure all sections of the permit are complete with sufficient detail to clearly identify the work to be performed;
- provide applicable supporting documentation as required for each permit; and
- ensure the permit is signed by the applicant or a supervisor/company representative.

Once issued, the scope of the permit must not be changed. If the scope of work to be completed changes then the existing permit shall be closed and a new permit should be applied.

**Note:** The KPA can request for further documentation associated with a permit at any time.

### **5.3.1. Urgent after hours authorisation**

Where a permit is required due to urgent operational need outside normal business hours the KPA on-call officer is to be contacted. This is applicable for all permits; land, slipway or marine side permits, (with the exception of, forklift Workbox and WP C6 crane cage permits, the shift supervisor is authorised to issue these permits) The applicant seeking the permit is responsible for ensuring the permit is completed and authorisation is obtained from the KPA on-call officer.

### **5.4. Issuing and Reviewing Permits**

Prior to authorising the permit, the permit authoriser will:

- ensure that all permits are completed legibly;
- ensure that the scope, location and timing of work is clearly described on the permit;
- review the applicant's proposed safety and risk controls as identified on the permit and the authoriser may request additional safety controls;
- review the scope of work with the applicant to ensure a mutual understanding of what the work entails, the tools to be used and the work methods - the permit authoriser relies on the applicant to understand the nature of the work and risks associated with it;
- ensure that all supporting documentation as per the specific permit is submitted by the applicant when applying for a permit, including an approved JHA and where required the rescue plan;
- if in doubt seek further advice from a KPA manager/supervisor in regards to the permit or supporting documents; and
- check that the work does not conflict with other work being undertaken at the time at any other location.

### **5.5. Authorisation**

Permits shall be authorised by the permit authoriser who will:

- ensure that any other area of KPA operations that may be impacted by the operation of a permit is notified prior to the work commencing;
- be satisfied that the applicant has met all the requirements of this procedure and understands fully their responsibilities as the applicant;
- ensure the applicant understands the permit requirements;
- obtain signature of the applicant; and
- authorise the permit.

### **5.6. Working under a Permit**

Upon receiving the permit, the applicant must:

- ensure that a hard copy of the permit and other associated documents including a JHA are readily available at the job site. For operations requiring a KPA SOP ensure the SOP is understood and completed by all involved in the Task

- ensure that all persons engaged in the work have the necessary training, competence, qualifications and licenses to carry out the work in a safe manner; and
- comply with the KPA safety and security requirements.

Permits are only valid for the period specified and only while conditions remain unchanged. If conditions change significantly, the start of work is significantly delayed, or if work ceases for an extended period, then the permit shall become invalid.

When the permit expires before the end of the work, the permit authoriser may extend it by altering the expiry time and initialing the change.

A permit cannot be transferred to another applicant. In such cases, a new permit must be generated.

All permits are invalidated in the event of an emergency. All work must cease immediately and the work site must be left in a safe condition. All permits must be rechecked and revalidated by the permit authoriser once the emergency is over and prior to work recommencing.

### **5.6.1. Vessel Masters Responsibility**

For wharf and marine side activities on vessels, the vessel owner/master is responsible for informing KPA when works relating to a permit issued to a third party are being undertaken. The following information must be provided:

- prior to works commencing, inform KPA of the permit number and time of commencement of work, and
- advice to KPA when the works have been completed.

Contact KPA during working hours on channel 14, and after hours via email to the operations department.

### **5.7. Close out of Permit**

The permit applicant must ensure the site is safe at the completion of their activity. A job is not complete until all waste, surplus material, personal danger tags and other work materials have been removed from the location and isolations have been reinstated.

Upon completion of the work, or on expiry of the permit, the applicant shall complete the "Completion" part of the permit and return to the Operations building or Engineering Office where it can be signed off by KPA or if after hours email a scanned copy to operations department (for wharf and marine side permits) or maintenance department (for landside and slipway permits).

The permit authoriser or designated person may choose to do a final inspection of the job site, and when satisfied, sign-off the permit.

### **5.8. Withdrawal of a Permit**

A breach of the permit conditions shall be brought to the attention of the applicant by a person witnessing a breach. On receiving report of a breach, the applicant will immediately have work stopped until the situation is discussed with the permit authoriser or KPA delegate.

The permit authoriser will withdraw a permit if the permit does not adequately address the works being undertaken and safe practices are not being adhered to.

In addition a permit may be withdrawn due to KPA operational needs.

### **5.9. Permit Audits**

KPA Managers/supervisors may audit the permit to work system from time to time. Where a breach or non-compliance has been identified the permit may be withdrawn.

## **6. VARIATION RECORD**

<b>Version No.</b>	<b>Version Date</b>	<b>Brief Description of Change</b>
1.0	Unknown	Initial distribution
2.0	March 2007	
3.0	October 2008	Updated as per the Port's document style conventions – content remains unchanged.
3.1	August 2010	Minor changes to document.
3.2	June 2011	Sections 3, 4.1.1, 5, 5.1, 8.2, 10 and acknowledgement assessment included.
4.0	October 2013	Review of entire procedure. Removed reference to Permit to work for a workbox with forklift. Clarification of roles for permit authoriser and permit applicant.
5.0	June 2014	Include requirement for documented rescue plan for all work at height, over the side and working from workbox and combine those permits. Split the Permit system into two areas (Landside and marine).
5.1	August 2014	Include clarification for authorization of forklift workbox permit.
5.2	October 2014	Include provision for Crane cage and FAQ sheet as appendix document
5.3	May 2015	Inclusion of summary table for permits.
5.4	July 2017	Full review with minor changes including: <ul style="list-style-type: none"> <li>• updates to position titles;</li> <li>• operations department processing all slipway permits (not Maintenance); and</li> <li>• changes made to permit forms.</li> </ul>



### ACKNOWLEDGEMENT

**This written assessment must be completed by KPA employees to ensure a good understanding of the Permit to Work Procedure.**

**Instructions:** All questions must be answered correctly; incorrect answers will require you to demonstrate your understanding to the HS Officer or delegate. Read each question carefully and tick the answer that is CORRECT and fill in where indicated. Pass mark is 100% correct.

#### QUESTIONS:

1. The KPA permit authoriser is responsible for authorising work to commence:  
 True  False
2. A Job Hazard Analysis (JHA), or similar document, must be completed for all work requiring a permit:  
 True  False
3. If you or your company are undertaking work at KPA that requires a permit, you are responsible for applying for the permit:  
 True  False
4. How long before commencing work should you endeavour to submit your permit?  
 30 mins  > 24 hours  12 hours  2 hrs
5. List three activities that require a permit:  
a) \_\_\_\_\_  
b) \_\_\_\_\_  
c) \_\_\_\_\_
6. After the completion of work you must sign the permit and return the permit to the permit authoriser or the operations office:  
 True  False

***I have read and understood the content of the Policy/Procedure and agree to be bound by the Policy/Procedure.***

Full Name (please print): \_\_\_\_\_

Company / Organisation: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## APPENDIX A - FAQ's Permit to Work

Here are some frequently asked questions with regards to the KPA permit system on vessels:

1. Is a KPA hot work permit required for hot works conducted onboard a vessel?
  - Yes - if the work is to be conducted outside of machinery space, for instance if conducting hot work on deck or over the side, then a KPA permit must be applied for by the person conducting the work. The person carrying out the work must also obtain a permit from the Vessel Master under the vessel safety management system.
  - No - if the hot works is to be conducted inside the machinery space, for instance instance in the ships engine room or workshop, then this activity falls under the vessels safety management system.
2. Is a working at Height Permit required for any work carried out at height on a vessel.
  - Yes - if the operation involves our personnel. For instance we use our employees to man the vessels or wharfs crane and supply a Dogman for the operation. In this instance the work being carried out would require the vessel to conduct the activity under its own permit system and our operators to also raise a permit under our system. The two systems would need to be aligned when it comes to the rescue plan and would fall under the control of the vessel system.
3. Is a confined space work permit required for vessel crew or contractors working in confined spaces on the vessel, even if it doesn't involve KPA equipment or personnel?
  - Yes
4. Is a Diving permit required for any diving operations in port controlled areas?
  - Yes

