

PERMIT TO WORK SYSTEM

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Audience: Operational Employees and Contractors Review Period: 2yrs

VARIATION RECORD

Version No.	Version Date	Brief Description of Change
1.0	2006	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"> • Updates to position titles; • Operations department processing all slipway permits (not Maintenance); and • Changes made to permit forms.
6.0	November 2019	Full review with changes including: <ul style="list-style-type: none"> • Update of PTW system objectives; • Change to permit processing through the Operations Department; and • Added additional controls around hot work.
6.1	January 2020	Additional information added to the procedure and diving permit regarding Harbourmaster authorisation of diving activities prior to the permit being authorised.

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:

- set a standard for all non-routine or hazardous work conducted on KPA controlled sites to be conducted in a manner which is planned, safe, considers potential simultaneous operations and avoids adversely impacting the environment;
- provide a system where KPA can coordinate works to avoid conflicting activities to maintain a safe working environment;
- provide a site hand over / hand back process; and
- clearly define the responsibility of the permit applicant, including that they accept all responsibility associated with the safe execution of works for which the permit is issued, including but not limited to ensuring that:
 - task hazard identification and control has been undertaken and supporting documentation (e.g. a job hazard analyses) is available;
 - the work area is set up and has been inspected (pre and post works);
 - equipment used is fit for purpose
 - training and competency needs are met; and
 - all necessary precautions have been considered before the work is authorised;

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 Procedure. 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 operations department are responsible for authorising and issuing all permits including:

- wharf,
- marine side,
- slipway; and
- landside permits

For KPA employees requiring to work in a crane workbox the shift supervisor is authorised to issue these permits. The forklift workbox and personnel cage do not require a permit.

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.

A permit board will be set up at the Operations Office to assist with the management of daily permits and minimise the opportunity for conflicts. Note: for diving permits the KPA Harbourmaster must authorise the activity prior to the permit authorisation.

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 KPA website: <http://www.kimberleyports.wa.gov.au/>.

Table 1: Permit to Work types

<u>KPA PERMITS</u>	All Vessels in Port Waters	Third Party Contractors (KPA jurisdiction)	KPA Works
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 / Workbox 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 Port permission	Request Port permission	Request Port permission
Immobilise Main Engine	Request Port permission	NA	NA

*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.

****All diving activities must be authorised by the KPA Harbourmaster, prior to the Permit Authorising authorising the permit.**

If in any doubt about permit type notify or clarify with Port Operations.

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.

All permits will be submitted to and authorised by the operations department at the Operations Office or email to 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.

When working under a hot work permit, if there is a bunker box within the vicinity of the works the bunker box is to be isolated and the Operations Department made aware of the isolation.

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 where it can be signed off by KPA or if after hours email a scanned copy to operations department.

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.

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 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

