

WHSMS High Risk Activities Management Procedure

Section 1 - Governing Policy

(1) This Procedure is governed by the [Work, Health, Safety and Wellbeing Policy](#).

Section 2 - Application

(2) This Procedure applies to all work undertaken by ACU or managed by ACU in the case of maintenance contractors. It does not apply to work undertaken by a Principal Contractor or managed by a Principal Contractor.

Section 3 - Permit to Work Processes

(3) This section outlines the requirements for the issue of Permits to Work to adequately control high risk work activities.

Application

(4) The [Permit to Work](#) shall be issued for asbestos removal work and identified high risk activities: hot works, confined spaces entry, working at height, isolation of plant or equipment. The [Permit to Work](#) may also be used for such other work as ACU Managers deem appropriate.

Permit Definitions

(5) In this Section, the following definitions apply:

Term	Definition
Authorised Person	The person authorised to issue the Permit to Work - the Facilities Manager or Nominee.
Permit Holder	The person in charge of the work activity to which the permit applies - the relevant ACU staff member or a contractor representative.

Permit Responsibilities

(6) The following table identifies the responsibilities held by the persons defined in clauses (5) and (6).

Table 1: Responsibilities

(7) Ensure that permits to work are cross referenced effectively with other interacting permits (e.g. [Confined Space Entry Permit](#) and [Hot Works Permit](#)).

Who	Responsibilities
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<p>Authorised Person</p>	<p>The Authorised Person shall:</p> <ul style="list-style-type: none"> • Ensure that the person requesting the permit has identified and risk assessed the hazards associated with the proposed work activity using a Job Safety Analysis Form (JSA) or similar before the permit is issued. • Ensure that a Safe Work Method Statement (SWMS) or similar is in place for the work and has been given an undertaking that staff involved in the work have been adequately trained in it • Be familiar with the intended task(s). • Identify isolation requirements before work commences. • Ensure that the work area and equipment is safe and isolated in accordance with the requirements set out in the permit and that all tags and signs are prominently displayed so that personnel are aware that the equipment is not to be operated. • Ensure that permits to work are cross referenced effectively with other interacting permits (e.g. Confined Space Entry Permit and Hot Works Permit). <p>Retain signed off permits for at least five years. Confined space entry permits shall be retained indefinitely.</p>
<p>Permit Holder</p>	<p>The Permit Holder shall:</p> <ul style="list-style-type: none"> • Identify any work requiring a Permit to Work and request the Permit. • Conduct a WHS risk assessment using a JSA or similar. • Ensure that the permit has all the required signatures before starting work. • Ensure they understand the requirements of the permit. • Be in charge of the work and supervise the persons (if more than him/herself) doing the work. • Be qualified trained and competent to perform or supervise the work, including the use of any personal protective equipment or rescue equipment. • Adhere to the Permit to Work requirements including all those specified in any associated high-risk work permits. • Ensure that the Authorised Person is informed when a job is completed or suspended and that the permit is properly handed over and signed off and cancelled. • Keep the permit readily available for inspection at the work site at all times whilst the work is being performed. • Ensure that the work is performed in a safe manner • Clean up the area and make it safe on completion of the work. • If circumstances or conditions change such that safety risks may have increased, cease or suspend work, make the work area safe and advise the Authorised Person.

Permit to Work Process Steps

(8) After the identification of a work activity requiring the issue of a [Permit to Work](#) the following process steps shall be followed:

- a. The Authorised Person shall liaise with the person requesting the permit and discuss the work activity being undertaken.
- b. The Authorised Person shall ensure that all prior actions and advanced safety measures are completed including risk assessments, that a SWMS has been produced and any necessary isolations are in place.
- c. The person requesting the [Permit to Work](#) shall complete the permit after agreeing with the Authorised Person on the permit duration and other high risk activity permit requirements.
- d. The Authorised Person shall sign and issue the [Permit to Work](#) and any other applicable high risk work permit, and the person requesting the permit shall become the Permit Holder.
- e. The Permit Holder shall brief other site personnel in relation to the [Permit to Work](#) and any other applicable high risk activity permits.
- f. The Permit Holder shall supervise the works activity ensuring compliance with the associated SWMS and the permit conditions and expiry date/time.
- g. Upon completion of the work, the Permit Holder shall sign the completion section of the [Permit to Work](#) and any other applicable high risk work permit, to confirm that work is complete or document its incompleteness.
- h. Following completion (or abandonment) of the work, the Authorised Person shall inspect the work location to ensure it is safe for normal use.
- i. The Authorised Person shall sign the [Permit to Work](#) and any other applicable high risk work permits as cancelled.

- j. The Authorised Person shall ensure that any outstanding high-risk work is undertaken under a new [Permit to Work](#).

Section 4 - Isolate Plant and Equipment

(9) This section outlines the requirements for the isolation of plant and equipment that is unsafe to operate or in the process of being cleaned, serviced, repaired or altered. A [Plant/Equipment Isolation Permit](#) shall only be issued with a [Permit to Work](#).

Definitions

(10) In this Section, the following definitions apply:

Term	Definition
Isolation	The removal of the energy source from an item of equipment in such a way as to prevent the possibility of accidental start-up of the whole or a section of that equipment. The isolation must also prevent the introduction of contaminants into working areas defined as confined spaces through equipment such as piping, ducts, vents, drains, service pipes and fire protection equipment.
Energy Sources	Energy stored in electrical, mechanical, hydraulic, pneumatic, chemical, thermal, gravitational or other form.
Isolation Measures	Locks, tags, closing and blanking, removal of mechanical linkages, blocks, slings, etc.

Plant and Equipment Isolation Instructions

(11) Specific isolation or lock-out instructions shall be developed for all plant and equipment that may be subject to isolation for cleaning, servicing, repair, alteration or other purposes.

Fire System Isolation

(12) Where fire systems require isolation, the Fire Impairment Notice shall be used. The Facilities Manager or Nominee shall ensure that the notice is completed in accordance with the timings stipulated in the notice as follows:

- a. Section 1 - 48 hours before shutdown
- b. Section 2 - prior to shutdown
- c. Section 3 - After system restoration

(13) The Facilities Manager or Nominee shall also ensure that Unimutual acknowledgement of restoration (Section 4) is received.

Isolation Process

(14) The isolation of plant or equipment shall be undertaken under a [Plant/Equipment Isolation Permit](#) as part of the [Permit to Work](#) process and shall be controlled in accordance with the process identified in Section 3.

Process Steps

- a. Isolation measures shall be identified as part of the preventative maintenance programme or through Job Safety Analysis and/or risk assessment.
- b. Only competent persons shall isolate equipment. Where a [Permit to Work](#) requires an isolation and the accompanying [Plant/Equipment Isolation Permit](#), the person responsible for isolating shall be clearly identified by the Authorised Person.

- c. The person responsible for isolating the plant or equipment shall undertake the isolation in accordance with the isolation or lock-out instructions for the plant or equipment.
- d. The person responsible for isolation shall complete the [Plant/Equipment Isolation Permit](#), certifying that the necessary isolations identified in the permit have been implemented.
- e. The Authorised Person shall review and sign the [Plant/Equipment Isolation Permit](#), authorising any work activity for which a [Permit to Work](#) was required, to proceed.
- f. The person responsible for isolation shall remove the isolation measures upon completion of the work activity and sign the [Plant/Equipment Isolation Permit](#) confirming removal.

Section 5 - Confined Spaces

Definitions

(15) In this Section, the following definitions apply:

Term	Definition
Confined Space	An enclosed or partially enclosed space that is not intended or designed primarily for human occupancy, within which there is a risk from one or more of the following hazards: <ol style="list-style-type: none"> 1. an oxygen concentration outside the safe oxygen range; 2. a concentration of airborne contaminant that may cause impairment, loss of consciousness or asphyxiation; 3. a concentration of flammable airborne contaminant that may cause injury from fire or explosion; and/or 4. engulfment in a stored free-flowing solid or a rising level of liquid that may cause suffocation or drowning.

Examples that may meet the definition for a confined space include: storage tanks, silos and other tank-like compartments; open-topped spaces such as pits; pipes, sewers, shafts, ducts and similar structures; that have limited or restricted entry and exit.

Identification

(16) ACU shall maintain a register of confined spaces present in ACU owned or managed facilities that clearly describes the type and location of each confined space and the corresponding hazard. Each confined space shall have a sign affixed to it immediately adjacent to the entry point. The sign shall indicate “DANGER. CONFINED SPACE. ENTRY BY PERMIT ONLY”.

Work in Confined Spaces

(17) Work in confined spaces shall only be undertaken by competent contractors engaged by ACU. ACU staff are not permitted to undertake work in confined spaces. Work in confined spaces shall be undertaken under a [Confined Space Entry Permit](#) as part of the [Permit to Work](#) process and shall be controlled in accordance with the process identified in Section 3.

(18) The Facilities Manager or Nominee shall ensure that:

- a. any cleaning or purging of the confined space required in advance of confined space entry has been undertaken;
- b. the contractor has undertaken a risk assessment of the confined space and produced a SWMS for the work activity to be undertaken in the confined space;
- c. isolations required for the safe entry and work in the confined space are identified and implemented [see Section 4];

- d. the contractor has established emergency first aid and rescue procedures for the confined space work;
- e. the contractor undertakes atmospheric testing of the confined space prior to any entry taking place (and during the work) and that all other identified control measures are in place. These control measures, as a minimum, shall include:
 - i. a person outside the confined space continuously communicating with the worker(s) inside the space or having him/her in sight at all times wherever possible;
 - ii. monitoring of the conditions within the space by a person who is in the vicinity of the space;
 - iii. continuous atmospheric monitoring of the confined space for oxygen level and flammable gases and vapours (as appropriate); and
 - iv. provision of air supplied respiratory equipment where the atmosphere in the space may have an oxygen level less than 19.5% by volume.

(19) Having satisfied themselves that the items above are in place or have been undertaken, the Authorised Person shall sign the [Confined Space Entry Permit](#) and follow the [Permit to Work](#) process in Section 3.

Records

(20) ACU shall keep the following records:

- a. a copy of the risk assessment related to the confined space entry for at least 28 days after the work is completed; and
- b. a copy of the risk assessment or entry permit for at least 2 years if a notifiable incident occurs. Refer to the [WHSMS Records and Document Management Procedure](#) for more information.

Section 6 - Working at Height (Falls)

Introduction

(21) This section outlines the requirements for working at height (falls). The harmonised WHS legislation in four of the five states in which ACU operates defines 'falls' rather than 'working at height'. The risk of a fall from any height must be managed in accordance with the hierarchy of control.

Use of Ladders

(22) When there is no reasonably practicable alternative, ladders may be used for working at height but shall be used in accordance with a Safe Operating Procedure or following a WHS risk assessment and production of an appropriate SWMS.

Roof Access

(23) Roof Access by ACU staff or contractors shall be undertaken only under a [Roof Access Permit](#) as part of the [Permit to Work](#) process and shall be controlled in accordance with the process identified in Section 3.

(24) Wherever possible, access to roofs shall be by using internal access. For roofs that are accessed externally, where reasonably practicable, these shall be accessed by an elevated work platform. The use of ladders to access roofs shall be in accordance with clause (22).

(25) The Facilities Manager or Nominee shall ensure that for all roof access with a risk of falling, all the following controls are used:

- a. a Safe Operating Procedure or risk assessment and appropriate SWMS are in place for the work to be

- undertaken requiring roof access;
- b. a fall arrest system is in place;
- c. all components of the fall arrest system (anchor points, lanyards and harnesses) have been tested within the required period;
- d. emergency first aid and rescue procedures for the roof access work have been established and that workers have been trained in those procedures; and
- e. access to the roof shall be provided within arm's reach of anchor points to ensure that workers can attach themselves before moving on to the roof.

Section 7 - Asbestos Removal

(26) This section describes the process for identifying and removing asbestos from ACU-owned facilities.

Definitions

(27) In this Section, the following definitions apply:

Term	Definition
Asbestos	The fibrous form of the mineral silicates belonging to the serpentine and amphibole groups of rock-forming minerals and includes actinolite, amosite (brown asbestos), anthophyllite, crocidolite (blue asbestos), chrysotile (white asbestos), and tremolite.
Asbestos Containing Material (ACM)	A material containing one or more forms of asbestos.
Class A licence	A licence issued by a regulator which allows the holder to remove friable asbestos-containing material and non-friable asbestos-containing material as specified in the licence.
Class B licence	A licence by a regulator which allows the holder to remove non-friable asbestos-containing material as specified in the licence.

The Identification of Asbestos

(28) Before commencing any work activity involving the disturbance (including drilling) of any part of any ACU owned building or plant, the Facilities Manager or Nominee shall consult the Asbestos Register to determine whether asbestos has been identified in the work area.

(29) If the register has identified the presence of asbestos, then proceed to clauses (32) and (33). If the work involves the exposure of concealed areas and other areas that have not been tested for the presence of asbestos, then samples shall be taken of all suspected ACM in accordance with clause (31).

(30) If the register does not identify asbestos and does not involve the exposure of concealed areas, then the work activity can proceed without further consideration of asbestos.

Sampling and Verification

(31) Where the sampling of potential ACM is required, ACU shall employ a competent person or company to undertake the sampling, ensuring that they also use a NATA accredited laboratory to test for the presence of ACM. The sampling work shall be undertaken under a [Permit to Work](#) in accordance with Section 3.

Planning for Asbestos Removal

(32) Only Class A licenced contractors shall be engaged to remove friable asbestos. A Class A or Class B licenced contractor can be engaged for the removal of non-friable asbestos. Listings of licenced asbestos removal contractors

can be found on the relevant state regulator's website.

(33) Prior to the commencement of removal works, ACU shall ensure that the licenced contractor:

- a. notifies the relevant state regulator in writing at least 5 days prior to commencing removal work and gives a copy of the notification to the Facilities Manager or Nominee; and
- b. develops a Control Plan.

Asbestos Removal

(34) The removal of asbestos by a licenced contractor shall be undertaken under a [Permit to Work](#) in accordance with Section 3.

(35) The Facilities Manager or Nominee shall ensure that:

- a. the licenced contractor provides to them a copy of the Control Plan;
- b. for the removal of friable asbestos, that the contractor has a supervisor on site at all times, and for the removal of non-friable asbestos, a supervisor is readily available;
- c. the contractor erects signs and barricades to prevent unauthorised access;
- d. as far as reasonably practicable, no one other than those undertaking the asbestos removal work has access to the asbestos removal area;
- e. the contractor has engaged an independent licenced asbestos assessor to undertake air monitoring;
- f. copies of the results of the air monitoring are received from the contractor and given to:
 - i. workers at the workplace;
 - ii. health and safety representatives at the workplace; and
 - iii. other persons at the workplace.
- g. on completion of the work, that a clearance inspection is carried out by a licenced asbestos assessor and a Clearance Certificate is issued.

Records

(36) On completion of the asbestos removal works, the Facilities Manager or Nominee shall ensure that the Asbestos Register is updated.

Section 8 - Revisions made to this Procedure

(37) The University may make changes to this Procedure from time to time to improve its effectiveness. If any staff member wishes to make any comments about this procedure, they should forward their suggestions to People and Capability.

Section 9 - Further Assistance

(38) Any staff member who requires assistance in understanding this Procedure should first consult their Nominated Supervisor or Manager who is responsible for applying the [WHSMS Implementation Procedure](#) within their work area. Should further information or advice be required staff should visit [Service Central](#).

Section 10 - Associated Information

(39) For related legislation, policies, procedures and guidelines and any supporting resources please refer to the Associated Information tab.

Status and Details

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Effective Date	18th December 2023
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Responsible Executive	Angelle Laurence Chief People Officer
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