Confined Spaces Management Procedure

Section 1 - Purpose and Scope

(1) This Procedure outlines requirements at The University of Queensland (UQ) for working in confined spaces and provides information about the hazards and precautions in place at UQ to reduce the risk of harm when working in confined spaces. UQ's legislative obligations for managing work in confined spaces are provided under the Work Health and Safety Regulation 2011 (WHS Regulation).

(2) This Procedure applies to all UQ workers on all UQ campuses and sites, including UQ controlled entities. For the purposes of this Procedure, the definition of UQ workers is broad and is intended to ensure UQ meets its responsibilities under the Work Health and Safety Act 2011. The definition of UQ workers is provided in the appendix.

(3) In addition to the requirements of this Procedure:

a. UQ's Confined Spaces Management Plans describe the systems developed by UQ to identify and mitigate the risks associated with work in confined spaces. UQ workers conducting work in confined spaces must refer to these plans in conjunction with the requirements of this Procedure:
    i. UQ Confined Spaces Management Plan.
    ii. Property and Facilities Division Confined Spaces Management Plan.
b. The Confined Space Code of Practice 2021 (the Code) provides practical guidance to achieving the standards of health, safety and welfare required under the WHS Regulation. Additional information about safe work practices when working in confined spaces is provided in the Code. UQ will implement relevant and appropriate measures from the Code.

Scope

(4) For the purposes of this Procedure, and as described in the WHS Regulation, a confined space means an enclosed or partially enclosed space that:

a. is not designed or intended primarily to be occupied by a person; and
b. is, or is designed or intended to be, at normal atmospheric pressure while any person is in the space; and
c. is or is likely to be a risk to a person's health and safety from:
    i. an atmosphere that does not have a safe oxygen level;
    ii. contaminants, including airborne gases, vapours, and dusts, which may cause injury from fire or explosion;
    iii. harmful concentrations of any airborne contaminants; or
    iv. engulfment.

Section 2 - Process and Key Controls

(5) The following requirements apply to all UQ workers proposing to conduct any work in a confined space at UQ.

a. UQ workers that have permission to work in and around confined spaces must be appropriately trained and competent.
b. Where the emergency rescue plan indicates that a rescue would require a trained rescuer to physically enter the confined space, UQ will outsource the work to competent contractors.
c. A risk assessment must be undertaken to identify the hazards present in and around all confined spaces. The risk assessment must be completed in UQSafe, reviewed and approved by the relevant supervisor as outlined in the Health and Safety Risk Management Procedure and when the activities change.
d. In addition to the above:
    i. Organisational Units must complete a task-specific risk assessment for the activity.
    ii. Property and Facilities P&F must complete a Job Hazard Analysis (JHA) for the activity.
e. High-risk construction work in confined spaces must not be carried out without a relevant Safe Work Method Statement (SWMS).
f. Work in confined space must not commence until the Confined Space Entry Permit (PF-179), and an Emergency Response Plan (ERP) has been completed by a competent person.
g. Completed Confined Space Entry Permits must be checked by the relevant Client Facilities Manager (for P&F managed or controlled space) or the Head of Organisational Unit or their delegate (e.g. HSW Manager) for all other confined spaces before work in a confined space can commence.
h. Contractors must obtain authorisation from P&F or the engaging UQ Organisational Unit to access the confined space (refer to the Confined Spaces Management Plans for details) and will work under their own permit systems.
i. Hot work must not be undertaken in a confined space that has a hazardous atmosphere unless a Hot Work Permit (PF-220) has been issued and approved.

Section 3 - Key Requirements

Confined Space Register

(6) P&F will maintain a register of confined spaces under their management or control across UQ campuses and sites.

(7) Organisational Units must maintain a local register for the confined spaces under their management or control.

(8) Access to confined spaces must be:

a. restricted by means of locked access (keys must remain with the authorised person controlling access – e.g. the relevant P&F Client Facilities Manager or Head of Organisational Unit); and
b. clearly signed at the entry to notify all persons of the confined space.

Risk Assessment

(9) The risks of working in confined spaces can be high and may include loss of consciousness, impairment, injury or even death from:

a. the immediate effects of airborne contaminants;
b. fire or explosion from the ignition of flammable contaminants;
c. difficulty rescuing and treating an injured or unconscious person;
d. oxygen deficiency or immersion in a free-flowing material, such as grain, sand, fertiliser, water or other liquids (engulfment);
e. falls from a height;

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f. environmental factors (e.g. extremes in temperature);
g. poor lighting; or
h. manual handling.

(10) Risk assessments for all activities involving work in confined spaces must be undertaken in UQSafe by the Organisational Unit and must address all associated risks.

(11) The hierarchy of risk control must be considered for developing and implementing control measures in the risk assessment process. Refer to the Health and Safety Risk Management Procedure for more information.

(12) Further guidance in conducting workplace risk assessments is available from Organisational Unit local HSW Manager or Work Health and Safety Coordinator (WHSC)).

Confined Space Entry Permit

(13) UQ workers must complete a Confined Space Entry Permit that has been approved by the authority in the prescribed form. The approval authority for the permit is as follows:

a. confined spaces controlled and managed by Property and Facilities – Client Facilities Manager; and
b. all other confined spaces – Local HSW Manager.

(14) Approved permits must be held and implemented by the Confined Space Work Supervisor at the location of the work.

(15) Closed permits must be retained by the approval authority.

Emergency Response Plan (ERP)

(16) UQ will outsource all work in confined spaces that requires a trained rescuer to physically enter the confined space to undertake the rescue. These tasks will be undertaken by external contractors with expertise and appropriate emergency procedures for such tasks.

(17) An Emergency Response Plan (ERP) must be developed by competent persons prior to entering a confined space. The WHS Regulation and the Code stipulate the need for emergency and rescue procedures when working in confined spaces. Consideration should be given to:

a. communications;
b. rescue and resuscitation equipment;
c. capabilities of rescuers;
d. first aid;
e. local emergency services;
f. complexity of rescue.

Competency and Training

(18) UQ workers that work in and around confined spaces and are responsible for installing, maintaining, using, and inspecting confined space equipment must be trained and competent. They must understand the hazards associated with the tasks, the requirements of the Confined Space Entry Permit and their associated control measures.

(19) UQ workers that are required to enter confined spaces, and/or conduct confined space rescue duties, at UQ must hold certificates of competency from a nationally accredited Registered Training Organisation (RTO).

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(20) Records of all training provided to UQ workers for working in confined spaces must be maintained by the Organisational Unit.

Hazardous Atmospheres

(21) In confined spaces with poor ventilation, a hazardous atmosphere may exist or may develop quickly. UQ workers must not enter a confined space unless the atmosphere has been determined as safe. This may require atmospheric testing and continuous monitoring. Further information about managing the risk of hazardous atmospheres in confined spaces is provided in the Confined Spaces Management Plans.

Hot Work

(22) Hot work must not be undertaken in a confined space without a Hot Work Permit that has been approved by the approval authority prescribed in the permit. The permit's approval authority is responsible for ensuring the safe execution of any hot work and all requirements of the permit are implemented. The approval authority has the ability to enforce the requirements of the permit.

Barricading and Signage

(23) Where work is being undertaken in or around a confined space, and there is a risk of inadvertent entry from others to the confined space, the area must be controlled by warning signage and/or barriers.

(24) Barricading and signage must be used to ensure, as far as practicable, all non-essential personnel and equipment is kept clear of any confined space work area.

Personal Protective Equipment (PPE)

(25) Personal Protective Equipment (PPE) must be used where determined to be an appropriate risk control measure, either in combination with other controls or as a stand-alone measure, through the risk assessment process or where stated in regulations. Refer to the Personal Protective Equipment Procedure for more information.

(26) Respiratory Protective Equipment (RPE) must be worn in situations where there is no exposure standard for an airborne contaminant. RPE refers to a range of breathing equipment, including air-supplied and self-contained breathing apparatus. The appropriate RPE should be based on the level and type of contaminants and the work to be done.

Section 4 - Roles, Responsibilities and Accountabilities

Heads of Organisational Units

(27) Heads of Organisational Units are responsible for:

a. managing the risk of confined space entry in their areas of responsibility in accordance with this Procedure and the Confined Spaces Management Plans;
b. seeking advice from their local WHSC or HSW Manager on implementing the requirements of this Procedure and the Confined Spaces Management Plans;
c. ensuring that Managers and Supervisors in their areas of responsibility, who manage UQ workers required to access confined spaces, are aware of this Procedure and the Confined Spaces Management Plans, and provide resources to meet the requirements of this Procedure; and
d. ensuring that the Organisational Unit's confined space register is completed and kept up to date.

Managers and Supervisors

(28) Managers and Supervisors are responsible for:

a. ensuring UQ workers under their supervision conducting work in and around confined spaces are suitably qualified, trained and competent (refer to 'Competency and Training' provisions above) and have been informed of the Confined Spaces Management Plans;
b. ensuring relevant equipment, information, supervision, training, and instructions to UQ workers regarding confined space work is provided; and
c. managing locks and keys for restricted access confined spaces.

Confined Space Work Supervisors

(29) Confined space work Supervisors must be trained and competent as required in the 'Competency and Training' provisions above of this Procedure and are responsible for ensuring:

a. risk assessments (completed in UQSafe) are conducted in consultation with UQ workers;
b. Job Hazard Analysis (JHA) are completed in consultation with UQ workers;
c. equipment controlled and managed in their Organisational Unit (e.g. harnesses, tripods, ropes, fall restraint devices and rescue equipment) is inspected and maintained in accordance with AS/NZS 1891 Industrial fall restraint systems and devices;
d. records of inspections and maintenance of all equipment is maintained and kept with the equipment;
e. required permits and documentation is completed as outlined in the 'Confined Space Entry Permit' and 'Hot Work' provisions of this Procedure; and
f. appropriate and practiced rescue plans have been developed independent of UQ Security and Emergency Services.

HSW Managers and Work Health and Safety Coordinators

(30) Health, Safety and Wellness Managers (HSW Managers) and Work Health and Safety Coordinators (WHSCs) are responsible for:

a. providing advice and guidance to UQ workers in their Organisational Unit on how to implement and operationalise this Procedure and the Confined Spaces Management Plans;
b. assisting Managers, Supervisors and UQ workers to conduct and review risk assessments for work in confined spaces; and
c. consulting with Health, Safety and Wellness Division (HSW Division) on any constraints to implementing the requirements of this Procedure or the Confined Spaces Management Plans.

(31) Local HSW Managers are the approval authority for confined space permits under the control of the Organisational Unit.

UQ Workers

(32) UQ workers conducting work in confined spaces are responsible for:

a. complying with the requirements of this Procedure and any information, training, or instruction they receive from their Manager or Supervisor;
b. inspecting any equipment, such as harnesses, lanyards, ropes and fall restraint devices to ensure it is in good physical condition prior to every use; and
c. assisting Managers and Supervisors in conducting risk assessments for tasks involving confined spaces.

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Property and Facilities Division (P&F)

(33) Property and Facilities Division (P&F) is responsible for:

a. maintaining a register for P&F managed or controlled confined spaces;
b. conducting risk assessments for P&F managed or controlled confined spaces and reviewing these risk assessments annually;
c. ensuring P&F workers undertake Job Hazard Analysis (JHA) before conducting work in confined spaces; and
d. inspecting and maintaining UQ's facade access systems (Davit Systems) for P&F managed or controlled confined spaces.

Client Facilities Managers

(34) P&F Client Facilities Managers are responsible for managing confined spaces within their precincts including:

a. managing locks and keys for restricted access confined spaces;
b. issuing Confined Space Entry Permits for P&F workers following completion of a job hazard analysis (JHA) and the ERP; and
c. authorising access to confined spaces to competent contractors.

(35) P&F Client Facilities Managers are the approval authority for confined space permits under the control of P&F.

Health, Safety and Wellness Division

(36) Health, Safety and Wellness Division (HSW Division) is responsible for:

a. supporting P&F in the ongoing development and implementation of this Procedure and providing health and safety advice to P&F when required or requested;
b. communicating this Procedure to Organisational Units and UQ's Safety Network for implementation; and
c. providing guidance and advice to Organisational Units, in collaboration with P&F, on the implementation of this Procedure.

(37) The Occupational Hygiene Advisor, within the HSW Division, will provide advice to Organisational Units on confined space identification, procedure preparation, training, ventilation, and testing arrangements.

Section 5 - Monitoring, Review and Assurance

(38) Property and Facilities Division is responsible for reviewing this Procedure as required, in collaboration with the HSW Division, to ensure its accuracy, relevance and effectiveness. Review of the procedure will also be informed by feedback from Heads of Organisational Units, Supervisors and Managers.

(39) HSW Division will conduct periodic audits of Organisational Unit compliance with this Procedure, which may include checking:

a. The existence, adequacy and review of confined space risk assessments and ERPs;
b. Confined Space Entry Permit approvals;
c. UQ workers' compliance with Confined Space Entry Permit requirements;
d. UQ workers' awareness of compliance obligations associated with this Procedure;
e. UQ workers' confined space competency and refresher training documentation; and
f. Management of contractors regarding work in confined spaces.

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(40) Local HSW Managers and WHSCs will conduct regular inspections (at least annually) to review appropriate risk controls.

Section 6 - Recording and Reporting

(41) HSW Manager and Organisational Unit Managers and Supervisors will ensure:

a. all incidents and near misses relating to confined spaces are reported in UQSafe;
b. non-compliance with this Procedure, the Confined Spaces Management Plans and relevant local standard operating procedures (LSOPs) is reported to the Head of the Organisational Unit, who will notify the HSW Division; and
c. approved Confined Space Entry Permits (PF-179) are recorded and held locally.

Section 7 - Appendix

Definitions

Term	Definition
Competent person	A person who has acquired through training, qualification or experience, or a combination of these, the training and knowledge and skills to carry out that task.
Hazardous atmosphere	An atmosphere is a hazardous atmosphere if: • the atmosphere does not have a safe oxygen level; or • the concentration of oxygen in the atmosphere increases the fire risk; or • the concentration of flammable gas, vapour, mist, or fumes exceeds 5% of the lower explosive limit (LEL) for the gas, vapour, mist or fumes; or • a hazardous chemical in the form of a combustible dust is present in a quantity and form that would result in a hazardous area.
Job Hazard Analysis (JHA)	Also called a Job Safety Analysis (JSA), is a technique to identify the hazards and risks of specific tasks in order to reduce the risk of injury to workers.
Safe Work Method Statement (SWMS)	In relation to high-risk construction work, is a safe work method statement mentioned in section 299 of the WHS Regulation.
UQ Workers	For the purposes of this Procedure includes: • staff - continuing, fixed-term, research (contingent funded) and casual staff; • contractors, subcontractors and consultants working under UQ systems and control (e.g. contingent workers); • visiting academics and researchers; • academic title holders, visiting academics, emeritus professors, adjunct and honorary title-holders, industry fellows and conjoint appointments; • higher degree by research students; and • volunteers and students undertaking work experience.

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