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1. Policy & Purpose

The purpose of this policy and procedure is to describe the procedures to be employed to ensure that all tasks that are required to be controlled by the use of a Permit to Work are managed appropriately and that the issue, operation and closure of a permit to work are carried out in a formal standardised and effective manner, and ensure that Permit to Work documents are used correctly and in line with Company policy. This document addresses the duties and responsibilities placed upon the Company and its employees, contractors, agency staff and all others by the Permit to Work policy.

This document applies to all managers, employees and contractors who have interest in any works or activities undertaken under the control of a Permit to Work.

2. Definitions

Permit to Work: A formal document which gives written permission for a person or persons to carry out work of a particularly hazardous nature or to work in a potentially hazardous environment. The Permit to Work document will contain information on work to be done and precautions to be taken. It is a clear record that all foreseeable hazards and risks have been considered and all appropriate precautions have been defined and implemented.

3. Requirements

The Company requires that all Permits to Work are effectively and appropriately used for the right reasons and are **NOT** to be used for other reasons such as an authority for contractors to carry out routine tasks, etc. They will only be prepared, authorised and issued by a person who has been appointed to issue them in writing and has received formal training in the importance, management and use of Permits to Work.

Permits will only be prepared, issued and utilised in strict compliance with the requirements of this policy and supporting procedures.

4. Statement

The use of a Permit to Work system is an extremely important function of the Company's management system and as well as helping control hazardous activities it demonstrates a heightened level of awareness and commitment to minimise risk.

A Permit to Work will only be issued by a manager, supervisor or other competent person, all of whom will have received formal Permit to Work training and will have been authorised and appointed in writing by a senior or General Manager and/or a Director using the Grundon form "Appointment to Authorise Permits to Work". They are designated as "Appointed Persons". Letters appointing them will be held by the respective Appointed Person at their place of work, and will be readily available for examination at all times.

It is the responsibility of managers to be fully aware of the requirements of this policy and its supporting procedures and to adopt and implement their requirements fully and effectively within the workplaces under their control.

Managers are to communicate the requirements of this policy/procedure and supporting documents to all employees and contractors who may be affected by them.

5. Responsibilities

The Board of Directors are responsible for:

- Ensuring the effective implementation of the Permit to Work policy and procedures.
- Allocating sufficient resources to enable the policy/procedures to be delivered.
- Monitoring the overall effectiveness of the policy and procedures.

Senior Managers are responsible for ensuring that:

- All managers under their control, are aware of the requirements of this policy/procedure and are trained and appointed in writing.
- All operations controlled by a Permit to Work are carried out in full compliance with Company policy and that it is communicated and delegated to the respective operational managers.
- They routinely monitor and review the activities carried out under a Permit to Work.

Operational Managers are responsible for:

- The communication of the Permit to Work policy and procedure, to all employees and/or contractors affected by it.
- The identification of all tasks and activities that will require to be controlled through a Permit to Work.

- Establishing, populating and maintaining a Permit to Work Register of documents issued, and subsequently closed out, (OP/GR/GEN/016h-i) or appropriate continuation register, at their respective locations.
- Ensuring that all Permits to Work are issued and managed as described within this policy/procedure and associated documentation.
- Ensuring that all documentation used in support of a Permit to Work is retained with the permit in question, and retained for audit purposes for at least 4 years.
- Nominating, arranging formal Company training, and appointing (in writing), suitable personnel authorised to issue Permits to Work, and maintain copies of the relating documents for audit purposes.

Employees are responsible for:

- Complying with the requirements of the Permit to Work policy and procedure.
- Attending any training or Tool Box Talk relating to Permits to Work when directed to do so.
- Reporting any issues which might affect anyone working under the Permit to Work system to their manager.

SHEQ Manager is responsible for:

- Along with the SHEQ Team, identifying and delivering Permit to Work training on behalf of the Company.
- Ensuring that regular audits of Permit to Work policy and procedures are carried out and findings are acted upon.

5.1 Permit Issuer (Appointed Person)

The permit issuer will be an authorised Appointed Person who has been appointed in writing on form OP/GR/GEN/016b. They must have a reasonable working knowledge of the work process to be carried out, and have received formal Company training in completing Permits to Work.

They should be able to demonstrate a clear understanding of the principles of the Permit to Work system.

They will be responsible for:

- Selecting, preparing, issuing monitoring and cancelling the Permit to Work Forms (OP/GR/GEN/016c, d, e, f and g) pertinent to the work being carried out.
- Allocate each Permit to Work with a unique serial number from the location's Permit to Work Register (OP/GR/GEN/016h-i) or continuation register.

- Discuss the work to be undertaken with the permit receiver, to confirm all hazards, controls, etc, and enter all these points on the Permit to Work form as appropriate.
- Arranging for the prominent display of a copy of the permit at a suitable location at all times whilst work is ongoing.
- Monitor the work to validate compliance with detailed work instructions and control measures and record this.
- Remaining on site for the duration of the permit. If the Issuer has to leave site then the permit must be closed off and a new one issued by another appointed person.
- Ensure that any other Company procedures, such as Isolation or Pass Over Padlock, are implemented where required.
- Ensuring that such ancillary equipment necessary to comply with the permit conditions, such as padlocks, multi-lock hasps, warning labels and notices are available for use prior to the permit being issued.

In order to carry out this duty thoroughly, the issuer may need to seek advice from the SHEQ Team.

5.2 Permit Receiver

The permit receiver must be able to demonstrate to the Issuer, that they understand the contents and conditions imposed by the permit, and that both parties agree the scope and extent of the permit conditions before it is accepted by the receiver.

They will also be responsible for:

- Ensuring that all persons (supervised by the receiver) working on the job have the scope and conditions of the permit explained to them.
- Exercising a suitable level of supervision, sufficient to ensure the conditions of the permit are observed.
- Ensure that if they make any changes to the process that deviates from the details within the Risk Assessment/Method Statements, they are to stop and inform the permit issuer of the changes before carrying on with the work and make the necessary changes to their documentation.
- Ensuring that all personnel, equipment, articles and substances (under the receiver's control) are removed from the area on completion or suspension of the work activity. At the end of the shift (or working day, whichever is sooner), the permit must be cleared and cancelled (see 4.2 Clearance/Cancellation)

NOTE: In order to be effective, a Permit to Work cannot be issued and accepted by the same person.

6. When to Use a Permit to Work

The use of a permit is required when work has been identified as particularly hazardous, or which warrants higher than normal safety precautions.

Managers and employees must note that there are specific work activities for which a Permit to Work will always be applied. These are:

- Any entry into a Confined Space (see OP/GR/GEN/022a) Any excavation work carried out in “virgin” (previously undug) ground, with the exception of cell and dig preparatory works in quarries and landfill sites, which will be covered by specific Safe Systems of Work.
- All fragile roof work – even if wearing PFPE (Personal Fall Protective Equipment).
- All hot work carried out by a contractor. (**Hot work** is any process that can be a source of ignition when flammable material is present or can be a fire hazard regardless of the presence of flammable material in the workplace. Common **hot work** processes are welding, soldering, cutting, brazing or grinding).
- All hot work carried out by a Grundon employee except those in the confines of a Grundon Workshop or Fabrication Workshop which are classed as designated areas.
- Any Work at Height above 2 m from the ground, with the exception of:
 - Work from behind a fixed hand rail whether on fixed or temporary platform, ie, cherry picker/scissor lift.
 - Work at height where PFPE is being used by those trained persons carrying out the work.
- Any electrical work over 25 volts AC, that involves removal or disconnection of circuit components (minor work such as the changing of bulbs is excluded from this regime) and any live electrical testing activities of fixed electrical wiring.
- Any work activity that a manager deems to be of such significance and has residual risk levels that are deemed worthy of the extra control of a Permit to Work.

6.1 Exemption

Any Hot Work carried out in the confines of a Grundon Workshop or Fabrication Workshop, which are classed as designated areas, need not complete a Hot Work Permit, however, a specific Risk Assessment for the work being carried out must be in place along with other control measures. The fire watch will be determined as part of the Risk Assessment.

7. The Use of Permit to Work

Permits will only be issued in support of a task specific Risk Assessment, an SOP or Method Statement and proof of competencies of the person(s) carrying out the works.

All permits **MUST** be closed at the end of each Shift or working day (whichever is sooner) and recorded in the Permit to Work Register.

Permits to Work will only be issued to an individual in control of the work activity. The permit will not be issued generically to a company.

Following closure of the Permit to Work it is to be retained securely and available for examination/audit for a minimum of 4 years.

7.1 Maximum Durations for Permits to Work

The maximum period for which a Permit to Work may be issued is one shift or working day (whichever is sooner). Where work extends beyond this, the Permit to Work will be closed off by the issuer (Appointed Person) and the receiver, the site/equipment will be made safe and a new Permit to Work will be re-issued on the following shift/day.

7.2 Clearance/Cancellation (“Signing-Off”)

When work is completed (or suspended), both parties must sign the clearance/cancellation part of the Permit to Work forms (OP/GR/GEN/016 c–g) to indicate that the work has been carried out (or if not, give reasons and identify any significant risks remaining). Both parties must confirm that the work has been completed or left in a safe manner with the Pass Over Padlock Procedure (OP/GR/GEN/015e) initiated, and record the date and time of clearance in the register. Only the Appointed Person who opens the permit can cancel the permit; before doing so, he must ensure that all operations to which the permit applies are in a safe condition and account for everyone involved.

A Hot Work Permit can be closed by the issuer after an initial contractor fire watch (part 4 of the Hot Work Permit) has been completed and then handed over to the permit issuer to complete the remaining fire watch when necessary.

Remember: A permit once cancelled cannot be re used even during the same shift/day. The Authorised Person must issue a new permit.

7.3 The Permit to Work Register

The Permit to Work Register must be kept secure at all times. Entries are to be made only by Appointed Persons (Issuers) and all entries must be closed out upon closure of the permit.

When a register is full it is to be archived as well as its supporting documentation, and a new (continuation) register opened.

8. Associated Documents/Records

- OP/GR/GEN/016b Appointment to Authorise Permits to Work
- OP/GR/GEN/016c Permit to Work - General
- OP/GR/GEN/016d Permit to Work - Confined Spaces
- OP/GR/GEN/016e Permit to Work - Hot Works
- OP/GR/GEN/016f Permit to Work - Electrical
- OP/GR/GEN/016g Permit to Work - Excavating
- OP/GR/GEN/016h-m Permit to Work Register/Continuation Registers
- OP/GR/GEN/022a Confined Spaces Policy & Procedure
- OP/GR/GEN/015a Isolation Policy & Procedure
- OP/GR/GEN/015e Pass Over Padlock Procedure