



Hard Facilities Department

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Summerhill Services Limited

Operational Procedure SSLOP03

Working in Confined Spaces

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PART A – PROCEDURE STATEMENT & OBJECTIVES

1.0 Purpose

- 1.1 The purpose of this Hard Facilities Operational Procedure is to protect staff and others against risks to their health while working in Confined Spaces;
- 1.2 The Health and Safety at Work Act – Section 2 requires safe access and egress, a safe workplace and safe systems of working. The Hard Facilities Department will assess all work activities and ensure that safe access and egress is provided to confined spaces;
- 1.3 The Confined Space Regulations 1997 require that all staff entering an area deemed as a confined space is appropriately trained, a risk assessment has been conducted, have all required PPE and safety equipment, and that the task is properly supervised. The Hard Facilities Department will comply with these requirements;
- 1.4 A confined space is a place which is substantially enclosed (though not always entirely), and where serious injury can occur from hazardous substances or conditions within the space or nearby. Including any chamber, tank, vat, silo, pit, trench, pipe, sewer, flue, well, or other similar space in which, by the virtue of its enclosed nature, there arises a reasonably foreseeable specified risk;
- 1.5 The main hazards associated with confined space work includes exposure to toxic, pathogen or radioactive substances; slips trips and falls; lack of oxygen; heat stress, residuals in tanks, poor visibility, collapse of structure, flooding and explosive atmospheres;

2.0 Applicability

- 2.1 This Operational Procedure applies only to all of the activities carried out either directly by, or under contract for the Hard Facilities Department of Summerhill Services Limited. The Trust itself has a central risk management policy (R&S 01), and this will be followed by the Facilities Department. This procedure simply extends the provisions to cover the Hard Facilities operations and activities.

Facilities Direct Trades are NOT allowed to enter any confined spaces: sewer manholes (deeper than 1.2m), water tanks or lift pits etc.

ONLY specialist approved contractors with RAMS and Emergency Rescue Plans in place may enter confined spaces.

3.0 Responsibility

- 3.1 It is the responsibility of the Facilities Management and Maintenance team to ensure this Operational Procedure is implemented.
- 3.2 All personnel as defined within Section 2 of this document 'Applicability' must adhere to the requirements of this Operational Procedure.

PART B – ORGANISATION

4.0 Roles and Responsibilities

4.1 Facilities Department

- 4.1.1 The Facilities Department will meet the requirements of the relevant regulations to carry out 'Risk Assessments' prior to work being undertaken. Entries into confined spaces are to be avoided if at all possible. A safe system of work is used to control entry and work in confined spaces. Ensure arrangements are put in place to deal with emergency situations. (See Regulation 5 Emergency Arrangements within Confined Space Regulations 1997) Where possible a permanent safe access will be provided.

4.2 Senior Facilities and Capital Managers duties:

- Ensure specific **risk assessments** are conducted prior to work within a confined space taking place, complete with **method statements** and an appropriate emergency **rescue plan** are obtained and filed;
- Where the risk cannot be eliminated or reduced by permanent measures, ensure that all relevant PPE / RPE and safe access equipment is provided, stored and maintained in a safe fashion;
- Ensure that only competent staff may conduct this work. This will involve checking the training and competence of Approved Specialist Contractors in confined space work on recognised courses with relevant experience.
- Ensure that all confined space work is conducted on a "Permit to Work" basis. Refer to the relevant SSLOP21 Permit Procedure for further details;
- Ensure that all confined space work is properly supervised e.g. Top/Safe man (qualified first aider) is in place, it has been isolated / purged / ventilated/ gas monitor readings taken and that lone working is not permitted on such activities;
- Periodically inspect work to ensure that it is being conducted properly and that all open chambers remain adequately guarded;
- Keep and maintain a register of all the confined spaces at their sites. Ensure that all estate team members know where these confined spaces exist;
- That all staff who are required to enter or control a designated confined space, receive working in confined space training and practical refresher training. Maximum period between training shall not exceed 3 years or a shorter duration if circumstances dictate.

4.3 **Capital Works Managers:**

- The capital works management team and project leaders shall liaise before any specifications or instructions are generated or before the first site meeting is arranged for any scheme with the Facilities manager responsible for that site, to discuss and agree the locations of the confined spaces for the projects or works. This procedure is to apply to on-going developing situations;
- Regulation 11 of the Construction (Design and Management) Regulations 2007 (CDM) places a duty on designers to ensure that any design includes adequate regard to the need to avoid foreseeable risks to the health and safety of any person on the structure at any time. Therefore, capital managers need to consider minimizing the future need to enter a confined space. Consideration should be given at the design stage to cleaning, inspection and maintenance work that may be required and where entry cannot be avoided, access arrangements shall meet or exceed the standards set out in the Confined Spaces Regulations.

4.4 **Management of Contractors:**

- It must be ensured that all contractors carrying out works on SSL sites are informed of the presence of confined spaces where necessary and ensure that they comply with this operating procedure;
- All contractors must be able to provide certified evidence that they are trained and competent to work in confined spaces. Confirming that they have worked under similar conditions;
- Contractors working for or within the SSL's premises shall be informed of any known additional hazards to which they could be exposed;
- Should there be a need for a contractor to enter a confined location out of normal working hours, then the "on call " estate/capital manger should liaise with the normal working week Facilities/capital manager responsible, regarding the execution of this work.

PART C – ARRANGEMENTS

5.0 Working In Confined Spaces

5.1 Key Points

- Decide whether the work will be carried out in a confined space;
- Confined spaces may include not only the obvious but also obscure areas such as ventilation ducts etc. If in doubt ASK;
- Beware of danger due to lack of oxygen or presence of dangerous fumes/toxic gases;
- Competent and trained personnel ONLY can work in confined spaces;
- Suitable emergency arrangements MUST be arranged BEFORE entry or work commences;
- Suitable competent supervision must be provided;
- A risk assessment and method statement complete with an emergency rescue plan must be carried out on all potential confined space work by an approved specialist contractor. These RAMS must be approved by the Facilities/capital manager responsible, before work commences or anyone is allowed to enter the confined space. The RAMS should assess the following:-

Type of work to be done

Isolation, purge, test/monitor gas readings

Cleaning before entry

The suitability of those doing the work

Top man / safetyman in attendance at ALL times (Qualified First Aider)

Means of communication

Present and previous contents

Rates of flow

The weather – wind, rain, frost

Amount of ventilation

Atmosphere quality – the working environment

The duration of the task – safe tools, generation of fumes or dust

The distance to be travelled

Lighting level – IEE wiring regulations BS7671 Section on Special Locations

Noise level

Fire precautions – No smoking, No flammable or combustible materials

Means of raising an alarm, notifying emergency services in advance of entry?

Plant and machinery present and /or needed i.e. mechanical ventilation

Access/egress/movement difficulties are safety harnesses and line required.

Suspension points for winch (PUWER / LOLER inspections for winch)

Underfoot conditions

Structure – damage, obstructions, loose debris

Any other local conditions e.g. will the work itself create hazardous situations

Liaison with local emergency services

Method statements from contractors must include the details of the safe system of work for entry into confined spaces.

SSL DOES NOT LOAN ANY SAFETY EQUIPMENT TO CONTRACTORS

5.2 **Permit to Work:**

- **Important note** – No one shall enter a confined space without the specific approval of the Facilities/capital manager responsible for issuing a permit to work, if required;
- The permit to work may need to be supported by the issue of any other permit to works which may be applicable or appropriate for the proposed works, inspections, tests or activity to be undertaken;
- A permit to work which lasts for the working day or shift is issued at the site by the Facilities/capital manager responsible, immediately before entry. Appendix B Management Pre-Entry Checklist for Confined Space Activities describes the precautions to be taken. The permit is normally closed by that same person;
- Permit writers are not permitted to issue permits to themselves;
- Contractors may possibly be allowed to issue their own permit to work under the following circumstances:-
 - Where confined spaces have been isolated, de-commissioned and handed over to the contractor
 - On new work – prior to commissioning
 - Where written permission has been given by the Facilities manager responsible for the works
- A permit can only be issued for a period up to a working day;
- Due to the nature of an emergency within the confined space it may be necessary to shutdown adjacent plant before attempting emergency rescue. This would need to be done in conjunction with the site Facilities team;
- Before issuing the permit check that the minimum size of an opening to allow access with full rescue facilities including self –contained breathing apparatus is 575mm. It will be necessary to check that a person wearing suitable equipment can safely and readily pass through any proposed entry and exit point.
- If unsafe working is observed by any SSL employee or any contractor the permit can be cancelled and the works / activity stopped.

5.3 **Direct Trades entering Sewer Manholes NOT exceeding 1.2m deep**

- Apply barrier cream to hands, wear gloves, don safety clothing including boots, bump cap, goggles;
- All manholes and inspection chambers are to be ventilated prior to any potential entry, if needed by lifting manhole nearby;
- No smoking, naked lights or engine exhausts are to be permitted within 5 metres of any open manhole. Danger notices should be posted;
- All open manholes or inspection chambers must have safety barriers erected around them;
- All manholes or inspection chambers must be checked for unusual smells. If in doubt contact the Facilities/capital manager who will arrange for the atmosphere to be tested. DO NOT ENTER until the all clear is given;
- Disturb sludge to test for hazardous gases/vapours etc.;
- Visually check condition of step irons, ascend step irons one at a time;
- Only one person within the manhole at one time;
- Ensure working person is visible at all times while clearing manhole;
- Replace manhole cover once debris is cleared;
- Remove all safety barriers;
- All tools and safety wear must be cleaned and disinfected upon completion of the work;
- The surrounding area shall be thoroughly washed down and disinfected upon completion of the work.
- Carry out personal hygiene at site welfare facilities.
- Report any abnormal occurrences, engineering defects, personal injury (obtain medical advice) and defects in equipment to the Facilities/capital manager.

6.0 Review

- 6.1 This strategy is reviewed every three years and updated if necessary by the Head of Facilities Manager. A review should take place when new or amended Regulations, Legislation and Guidance occur.

7.0 Records

- 7.1 Suitable and sufficient records of training, permits, risk assessments and method statements will be maintained.
- 7.2 Register of confined space locations to be maintained and updated, especially when building alterations / refurbishments have taken place, including the renaming of wards.
- 7.3 Medical fitness records maintained e.g. Persons suffering from Claustrophobia will not be allowed access. Training awareness should be provided for Leptospirosis (Weil's disease), before any entry is allowed.
- 7.4 Rescue equipment inspection records (PUWER/LOLER) and rescuer training records maintained. Breathing apparatus (certified fit for purpose) records kept.

PART D – APPENDICES

APPENDIX A: RECOMMENDED LIST OF PROTECTIVE CLOTHING AND EQUIPMENT

- Safety Helmet complete with visor
- Goggles and Ear Defenders
- Sweat Shirts, T Shirts and Trousers
- Waterproof Over Clothes
- Appropriate PPE and RPE (assessed for the individual task)
- RAMS for the task with Rescue Plan and equipment to support the rescue
- Safety Harness
- Safety Line
- Man rescue winch
- Atmosphere testing equipment
- Breathing Apparatus
- Boots and Gloves
- Fire fighting equipment
- Personal Alarm
- Hand Torch (intrinsically safe)

APPENDIX B

Management Pre-Entry Checklist for Confined Space Activities

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Topic	Safety Points	Remarks
1. Pre-planning	Is entry absolutely necessary? Has a risk assessment been carried out? Have all hazards and sources of danger been identified? Means of communication, are radios required? Are suitable weather conditions required? Duration of the task? Distance to be travelled? Underfoot conditions?	
2. Isolation and emptying arrangements	Is the confined space securely isolated /purged from all sources of danger? (e.g. liquids, solids, gases, steam, mechanical and electrical) Is "Lock Out/Off" of the confined space area required? Is the confined space empty of product?	
3. Ventilation	Is the confined space clean (residues removed)? Is natural ventilation adequate or is forced ventilation required? Will forced ventilation lower temperatures within space?	
4. Atmosphere monitoring	What are the requirements for atmosphere monitoring? (E.g. flammable gases, toxic gases, oxygen deficiency). Are the arrangements for monitoring (initial and on-going) satisfactory? Will a COSHH assessment be required?	
5. PPE	Have all PPE needs been identified? Is sufficient and appropriate PPE available? (Breathing apparatus at hand in good working order) Are staff fully conversant with the correct method of use?	

APPENDIX B

Management Pre-Entry Checklist for Confined Space Activities

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Topic	Safety Points	Remarks
6. Access arrangements	Have satisfactory arrangements been made for safe access and egress (e.g. ladder provision)? Is a trained Top/Safe man attendant on site to keep watch? Have satisfactory arrangements been made for lowering/raising tools and equipment? Is the entrance big enough to allow access and egress in an emergency?	
7. Permit-to-work	Are “permits-to-work” required? Is the Permit authorised by the relevant member of staff? Does the permit identify the safe area of work and clearly state all measures taken to achieve safety (e.g. points of isolation and on-going monitoring requirements?)	
8. Tools and equipment	Are all tools and equipment in good condition and safe to use? Have satisfactory precautions been taken to ensure safe use of portable electric tools? (E.g. cordless battery or 110V centre tapped to earth (CTE systems) so that max voltage to earth does not exceed 55V.	
9. Competency	Are all staff involved in the work appropriately trained? Do all staff fully understand their role and responsibilities?	
10. Emergency procedures	Is there a plan for dealing with emergencies, e.g. an emergency rescue plan? Is all necessary emergency equipment available at site and in good working order? (Safety line/tripod/harness etc.) Are all staff fully conversant with the rescue procedures? Do the emergency services need to be notified in advance of the entry?	

APPENDIX C: FORMS & ATTACHMENTS

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APPENDIX D: AMENDMENTS

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