



CONFINED SPACES PROCEDURES

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1. PURPOSE

The purpose of this procedure is to provide guidance on how to manage risks associated with confined spaces that are under the control of David Jones.

2. SCOPE

This procedure applies to workplaces under the control of David Jones and more specifically to work that involves spaces that may be classified as a confined space, in accordance with Legislative and Standard requirements. The scope of this procedure is applicable to contractor activities only as David Jones employees are not authorised to undertake confined space work

3. KEY TERMS

Term	Description
Competent Person	A competent person is one who has acquired through training, qualification or experience, the knowledge and skills to carry out the relevant task.
Confined Space	An enclosed or partially enclosed space that: <ul style="list-style-type: none">• Is not designed or intended primarily to be occupied by a person; and• Is, or is designed or intended to be, at normal atmospheric pressure while any person is in the space; and• Is or is likely to be a risk to health and safety from:<ul style="list-style-type: none">○ An atmosphere that does not have a safe oxygen level, or○ Contaminants, including airborne gases, vapours and dusts, that may cause injury from fire or explosion, or○ Harmful concentrations of any airborne contaminants, or engulfment.
Confined Space Entry	Confined space entry is defined as where a person's head or upper body is within the boundary of the confined space. Inserting an arm for the purpose of atmospheric testing is not considered as entry into a confined space.
Confined Space Entry Permit	A document which gives authorisation, under specific conditions, to competent persons to undertake confined space work. This document is to be completed by the contractor and authorised by the Permit Issuer.
Confined Space Work	Any work associated with a confined space, including work inside or adjacent to the space.
Contractor	An individual other than a worker or a corporation who performs work or provides services for David Jones at a David Jones site. They are bound to complete a service/project or specified activity under a contract arrangement.
Hot Works	Any work that has the potential to create a source of ignition. This may include, but is not limited to, grinding, welding, thermal or oxygen cutting or heating, burn offs and other related heat or spark producing operations.
Manager	For the purpose of this procedure reference to a manager means reference to the David Jones representative who has management and control over the location or scope of works referred to.
Permit Issuer	A nominated David Jones representative who has acquired through training, qualification or experience, the knowledge and skills to carry out the following tasks: <ul style="list-style-type: none">• Review of contractor confined space competencies;• Review of contractor confined space hazard identification and assessment documentation; and• Review, authorise and close out Confined Space Entry Permits.



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Safe Work Method Statement	<p>A Safe Work Method Statement:</p> <ul style="list-style-type: none"> • Describes how work is to be carried out; • Identifies the work activities assessed as having risk; • Identifies the risks; and • Describes the controls that will be applied to the work activities.
Stand-by Person	<p>A competent person(s) who remains outside of a confined space and is capable of being in continuous communication with, and if practicable, observe those persons(s) inside the confined space. They initiate first aid and rescue procedures, if required.</p>

4. RESPONSIBILITIES

Role	Responsibilities
Contractors	<ul style="list-style-type: none"> • Undertaking confined space work in accordance with the requirements of this procedure. • Completing the required contractor pre-qualification activities, including induction, prior to undertaking confined space work on behalf of David Jones. • Undertaking hazard identification and assessment activities prior to completing confined space work. • Completing the Confined Space Entry Permit and seeking authorisation from the Permit Issuer prior to undertaking confined space work. • Returning the Confined Space Entry Permit to the Permit Issuer for close out of the permit and verification that works have been appropriately completed. • Reporting any incidents or uncontrolled hazards to the Permit Issuer for resolution and/or escalation.
Facilities Management or Real Estate Development	<ul style="list-style-type: none"> • Provide feedback to Managers or Permit Issuers, as required, with regard to appropriate fire services impairment methods. • Ensuring that contractors undertaking activities on their behalf have completed the appropriate contractor pre-qualification activities, including induction, prior to work taking place. • Ensure all identified confined spaces are appropriately labelled.
Managers	<ul style="list-style-type: none"> • Overseeing implementation of this procedure relevant to their area of responsibility. • Ensuring that confined spaces under their control are identified by a competent person and included on the local confined space register. • Ensuring that contractors undertaking activities on their behalf have completed the appropriate contractor pre-qualification activities, including induction, prior to confined space work taking place. • Ensuring that contractors undertaking activities on their behalf have been informed of and provided access to the relevant confined space register. • Ensuring that the nominated Permit Issuer has been provided with the appropriate information, instruction and/or training to enable them to competently complete their required tasks. • Informing the David Jones WHS Department of any incidents or uncontrolled hazards associated with the confined space work.
Permit Issuers	<ul style="list-style-type: none"> • Working in accordance with the requirements of this procedure. • Reviewing the currency and suitability of contractor documentation prior to confined space work taking place. • Reviewing Confined Space Entry Permits to ensure that appropriate measures have been taken to manage risk associated with confined space work. • Authorising confined space entry following review of the Confined Space Entry Permit. • Cancelling the Confined Space Permit on satisfactory completion of the work or where permit requirements may have been breached.



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Role	Responsibilities
	<ul style="list-style-type: none">Informing the relevant Manager of any procedural or permit breaches or incidents or uncontrolled hazards associated with the confined space work.
Workplace Safety and Wellbeing	<ul style="list-style-type: none">Ensure appropriate procedures are in placeAssist in the implementation of procedure.Ensuring that the nominated Permit Issuer has been provided with the appropriate information, instruction and/or training to enable them to competently complete their required tasks.

5. PROCEDURE

5.1 General

In accordance with legislative requirements, David Jones has a duty, so far as is reasonably practicable, to ensure that its employees, contractors and sub-contractors are not exposed to an unacceptable level of risk arising from confined space work.

A confined space is an enclosed or partially enclosed space that:

- Is not designed or intended primarily to be occupied by a person; and
- Is, or is designed or intended to be, at normal atmospheric pressure while any person is in the space; and
- Is or is likely to be a risk to health and safety from:
 - An atmosphere that does not have a safe oxygen level, or
 - Contaminants, including airborne gases, vapours and dusts, that may cause injury from fire or explosion, or
 - Harmful concentrations of any airborne contaminants, or engulfment.

Confined spaces are commonly found in vats, tanks, pits, pipes, ducts, flues, chimneys, silos, containers, pressure vessels, underground sewers, wet or dry wells, shafts, trenches, tunnels or other similar enclosed or partially enclosed structures, when these examples meet the definition of a confined space, as above.

Note that confined space entry shall only be undertaken by David Jones contractors whom are appropriately trained/qualified in confined space entry techniques and in accordance with the requirements of this procedure, which shall include the completion of a Confined Space Entry Permit (FORM- 05-17-01).

Prior to undertaking confined space work for David Jones, contractors are required to complete the relevant prequalification activities, including inductions, in accordance with the Contractor Management Procedure (PRO-05-01-03).

5.2 Identification of Confined Spaces

David Jones has a legislative obligation to identify confined spaces that are under its control.

Following identification, confined spaces shall be recorded on a register. The register shall include the following information as a minimum:

- The location of the confined space;
- The type of confined space, for example sewer pit or grease trap; and



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- Hazards that are required to be communicated to contractors who may be required to enter the space.

A confined space register shall be created for each David Jones site where confined spaces are identified. The register shall be communicated to relevant David Jones employees who may be required to oversee the permit issuing process or contractors who may be required to enter confined spaces on behalf of David Jones, for example plumbers.

David Jones had used a competent third party to carry out an independent at all David Jones sites to identify the presence of confined spaces. Each site has a confined space register and a corresponding risk assessment for each identified confined space. The Confined Spaces Register is kept with the Asbestos register at the staff door.

Note that confined space identification activities shall be undertaken by a competent person, which may be a suitably qualified third party service provider or appropriately trained internal David Jones resource.

5.3 Training

5.3.1 Contractors

Contractors required to enter confined spaces or undertake the role of the confined space stand-by person must demonstrate completion of appropriate training.

Due to the high risk nature of confined space entry, contractors must have completed a Nationally Accredited training course in confined space entry and use of breathing apparatus. In accordance with industry best practice, contractors should demonstrate completion of confined space refresher training every two years, as a minimum.

Contractors are not permitted to enter a confined space or undertake the role of the confined space stand-by person without being able to demonstrate appropriate competency. This may be achieved providing a copy of a current certificate, ticket or other record, that demonstrates completion of a Nationally Accredited training course in confined space entry and use of breathing apparatus.

It is the responsibility of the Permit Issuer, to verify that contractors have completed the appropriate confined space entry training, prior to work taking place.

5.3.2 Permit Issuers

Permit Issuers shall be trained and assessed as competent to complete relevant confined space tasks, such as:

- Review of contractor competencies;
- Assessment of contractor hazard identification and assessment documentation; and
- Review and authorisation of Confined Space Entry Permits.

Not that training may be provided internally by a competent person or by a specialist third party service provider.



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5.4 Hazard Identification and Assessment

Prior to undertaking confined space work, contractors are required to identify, assess and control hazards associated with the work. This may be demonstrated by providing to the Permit Issuer a site/task specific Safe Work Method Statement (SWMS) or other equivalent risk assessment documentation.

SWMSs developed for confined space work should give consideration to hazards and controls within and outside of the confined space, including:

- Emergency response and evacuation;
- Whether the work can be carried out without the need to enter the confined space;
- Oxygen concentration below 19.5%;
- Oxygen enriched atmospheres, with oxygen concentration greater than 23.5%;
- The presence of contaminant in the atmosphere or on surfaces;
- Free-flowing solids stored in the confined space;
- Potential for the increase in the level of liquid in the confined space;
- Inability to maintain continuous communication and/or observation between those in the confined space and the standby person;
- Radiation;
- Hot work;
- Work at height;
- Unsafe entry and exit or unsafe surfaces;
- Lighting;
- Electrical hazards;
- Openings obstructed by fittings or equipment that could impede rescue;
- Entrapment by the operation of moving equipment;
- Services entering the space;
- Operation of plant and equipment located within close proximity to the space; and
- The tasks conducted in the confined space that may produce harmful fumes.

It is the responsibility of the Permit Issuer to review contractor SWMSs for currency and suitability prior to work taking place.

5.5 Confined Space Entry Permit

A Confined Space Permit (FORM- 05-17-01) shall be completed by the contractor undertaking the confined space work and shall be checked and authorised by the Permit Issuer prior to entry.

A Confined Space Permit may be valid for up to 12 hours. A new permit will require completion if the person with direct control of the work changes, changes are made to the work that introduces hazards not addressed by the current permit, or new risk controls are required. Where there is a break in the continuity of work, a new permit may be required based on the outcomes of the SWMS or equivalent risk assessment documentation.

Each permit only applies to one (1) confined space and allows one (1) or more workers, listed on the permit, to enter that space.



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A Confined Space Permit is also required if a worker is required to enter a confined space to conduct the initial hazard identification or risk assessment. The permit may need to be revised after the assessment is completed.

The entry permit shall be displayed in a prominent place to facilitate signing and clearance. The permit shall remain in place until the confined space work is completed. Each affected stakeholder must be able to understand the entry permit.

The permit must be kept until the work is completed, or if a notifiable incident occurs, for at least two (2) years after the confined space work to which the permit relates is completed.

For the purposes of meeting legislative requirements and industry best practice, the David Jones Confined Space Permit (FORM- 05-17-01) has been adapted from Appendix H of Australian Standard AS 2865:2009 Confined spaces.

5.6 Communication and Monitoring

A communication system established to enable communication between contractors inside and outside the confined space and to summon help in an emergency. Depending on the conditions in the confined space, communication can be achieved by voice, radio, hand signals or other suitable methods.

Before a worker enters a confined space, a stand-by person must be assigned to continuously monitor the wellbeing of those inside the space and if practicable, observe the work being carried out and initiate appropriate emergency procedures when necessary.

The stand-by person should:

- Understand the nature of the hazards inside the confined space and be able to recognise signs and symptoms that workers in the confined space may experience;
- Remain outside the confined space and do no other work which may interfere with their primary role of monitoring the workers inside the space;
- Have all required rescue equipment (for example, safety harnesses, lifting equipment, a lifeline) immediately available;
- Have the authority to order workers to exit the space if any hazardous situation arises; and
- Never enter the space to attempt rescue.

5.7 Emergency Procedures

Contractors must establish and implement appropriate first aid and rescue procedures, to be followed in the event of an emergency. These procedures shall be practised as necessary to ensure that they are efficient and effective. First aid and rescue procedures must be initiated from outside the confined space, as soon as practicable, in the event of an emergency.

Note that a rescue should only be attempted by appropriately competent personnel and in accordance with the permit and SWMS or equivalent risk assessment documentation.



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5.8 Confined Space Signage

Before any work in relation to a confined space commences, signage must be erected to prevent entry of persons not involved in the work. Signs must warn against entry by people other than those who are listed on the Confined Space Permit and must be placed at each entrance to the confined space. Signs must be in place while the confined space is accessible, including when preparing to work in the space, during work in the space and when packing up on completion of the work.

Signage should read "Danger Confined Space, Authorised Entry Only", or to that effect.

Note that, where practicable, confined space signage shall be permanently fixed to, or adjacent to the confined space entry point, for example hatch, lid or gatic cover.

5.9 Atmospheric Testing and Monitoring

Atmospheric testing of the confined space, consistent with the contractor's SWMSs should be conducted before the permit is issued.

Normal entry should only be considered when the test results show that the confined space is safe. A suitable gas detector should be used for testing of the atmosphere, in accordance with manufacturer's recommendations and relevant standards.

Retesting and monitoring of the atmosphere may be necessary. Arrangements should be made for repeat tests for oxygen and airborne contaminants at intervals that take account of the likelihood of a change in conditions.

Use of continuous monitors with alarms may be the most effective approach. If there is a significant break in occupancy of a confined space, the atmosphere should be retested before re-entry.

5.10 Maintenance of Confined Space Equipment

Contractors must ensure that any equipment used for confined space work is appropriately maintained. Maintenance may involve periodic certification, calibration, visual checks and inspections, testing of equipment, preventative maintenance and remedial work. Equipment requiring regular inspection and maintenance includes:

- Atmospheric testing and sampling equipment, such as gas detectors;
- Personal protective equipment, including respirators;
- Ventilation equipment;
- Safety harness and lines; and
- Emergency rescue equipment.

5.11 Completion of Work

Once the confined space work has been completed, the Permit Issuer shall confirm that the work site has been made safe. This shall include ensuring that the confined space is appropriately secured from unauthorised access. Any lids, hatches, gatic covers, or similar must be secured and locks, where applicable, replaced. The Confined Space Permit (FORM-05-17-01) must not be signed off as complete, until the Permit Issuer has checked and verified that the site has been made safe.



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5.12 After Hours Work

David Jones understands that some confined space activities may be required to be completed after hours. This however, does not negate David Jones' responsibility to implement appropriate risk control measures to ensure that contractor activities are completed in a safe manner and in accordance with legislative requirements. As a result, the relevant David Jones Manager shall ensure that appropriate resources, such as a Permit Issuer, are available for compliance with permit requirements, as required.

5.13 Additional Permits

Where the confined space work requires the completion of any of the following activities, additional permits will require authorisation prior to work taking place:

- Hot Works, refer to the Hot Works Procedure (PRO-05-11-01);
- Work at a height of two (2) metres or above, refer to the Work at Heights Procedure (PRO-05-14-01);
- Isolation of fire services, refer to the Hazardous Work Procedure (PRO-05-12-01);
- Electrical isolation, refer to the Hazardous Work Procedure;
- Gas work, refer to the Hazardous Work Procedure;
- Hazardous Materials Work, refer to the Hazardous Work Procedure; and
- Trenching or excavations, refer to the Hazardous Work Procedure.

5.14 Records and forms

Record	Person Responsible	Storage Location	Storage Period
Confined Space Entry Permit (FORM- 05-17-01)	The relevant Manager	Electronic WHS Database	For the duration of the work or two (2) years as a minimum in the event of an incident

6. REFERENCES

6.1. Related Policies and Procedures

- Contractor Management Procedure (PRO-05-01-03)
- Hot Works Procedure (PRO-05-11-01)
- Work at Heights Procedure (PRO-05-14-01)
- Hazardous Work Procedure (PRO-05-12-01)

6.2. External References

- Australian State and Territory Work Health and Safety Acts & Regulations
- Australian Standard AS 2865:2009 Confined spaces
- Safe Work Australia Model Code of Practice for Confined Spaces – 2014



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7. VERSION CONTROL

Version	Section Amended	Amendment	Date Created	Author
PRO-05-13-01	All	New procedure	08/2017	HR Manager WHS