

Livewell Southwest

Confined Spaces Policy for Estates

Version No 1.3

Notice to staff using a paper copy of this guidance

The policies and procedures page of Intranet holds the most recent and procedural version of this guidance. Staff must ensure they are using the most recent guidance.

Author: Authorised Person (Confined Spaces)

Asset Number: 799

Reader Information

Title	Confined Spaces Policy for Estates. V.1.3
Asset number	799
Rights of access	Public
Type of paper	Policy
Category	Non Clinical
Document purpose/summary	The Confined Space Regulations 1997 place substantial duties on Livewell Southwest (LSW) to prevent or safely control entry into or work within confined spaces. This document sets out the responsibilities of Estates Department in safely managing access into confined spaces within LSW's estate.
Author	Estates Compliance & Safety Manager and Approved Person (Confined Spaces)
Ratification date and Group	19 th January 2016. Policy Ratification Group
Publication date	27 th January 2016
Review date and frequency (one, two or three years based on risk assessment)	27 th January 2019 Three years after publication, or earlier if there is a change in evidence.
Disposal date	The PRG will retain an e-signed copy for the archive in accordance with the Retention and Disposal Schedule. All copies must be destroyed when replaced by a new version or withdrawn from circulation.
Job title	Estates Compliance & Safety Manager
Target audience	All LSW staff
Circulation	Electronic: LSW intranet and website (if applicable) Written: Upon request to the PRG Secretary on ☎ 01752 435104. Please contact the author if you require this document in an alternative format.
Consultation process	This policy was produced in consultation with managers from: Estates Department Risk Management Department
Equality analysis checklist completed	Yes
References/source of information	<u>Legislation</u> Health and Safety at Work etc Act 1974 Management of Health and Safety at Work Regulations 1999 Confined Spaces Regulations 1997 Lifting Operations and Lifting Equipment Regulations 1998 Electricity at Work Regulations 1989 Control of Substances hazardous to Health Regulations

	<p>2002 Provision and Use of Work Equipment Regulations 1998 Personal Protective Equipment at Work Regulations 1992 Workplace (Health, Safety and Welfare) Regulations 1992</p> <p><u>Guidance</u> HSE ACOP L101 Safe Work in Confined Spaces 2009 HSE ACOP L21 Management of Health and Safety at Work 2000 HSE ACOP L22 Provision and Use of Work Equipment Regulations 2008 HSE L25 Guidance on Personal Protective Equipment at Work Regulations 2005 Water UK The Classification & Management of Confined Space Entries 2008 HSE HSG250 Guidance on Permit to Work Systems: A guide for the petroleum, chemical and allied industries 2005. The relevance of this guidance is not restricted to the petroleum industry. It will be helpful in any industry or work activity where the preparation and application of permits to work are being considered. HSE INDG163(rev2) 5 Steps to Risk Assessment Leaflet 2006</p>
Associated documentation	<ul style="list-style-type: none"> • Risk Management Strategy • Health and Safety Policy • COSHH Policy • Infection Prevention & Control Policy • Electrical Safety Policy • Slips, Trips & Falls Policy for Employees • Incident Reporting & Investigation Policy • Fire Safety Policy • First Aid Policy • Legionella Bacteria Control Policy • Lone Working Policy • Asbestos Policy (Management of)
Supersedes document	All previous versions
Author contact details	By post: Local Care Centre Mount Gould Hospital, 200 Mount Gould Road, Plymouth, Devon, PL4 7PY. Tel: 0845 155 8085, Fax: 01752 272522 (LCC Reception).

Document review history

Version no.	Type of change	Date	Originator of change	Description of change
V0.1	New policy	June 2011	Authorised Person (Confined Spaces)	New Estates' policy
1	Ratified	June 2011	Estates Compliance & Safety Manager	
1.1	Extended	November 2013	Estates Manager	Extended no changes
1.2	Extended	August 2014	Estates Manager	Extended no changes
1.3	Updated	January 2016	Deputy Head of Estates	Reformatted to LSW template. Reviewed with no major changes

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Confined Spaces Policy for Estates

1 Introduction

- 1.1 A number of people are killed or seriously injured in confined spaces each year in the UK. This happens in a wide range of industries, from those involving complex plant to simple storage vessels. Those killed include not only people working in the confined space but those who try to rescue them without proper training and equipment.
- 1.2 The Confined Spaces Regulations 1997 were made under the Health and Safety at Work etc Act (HSW Act) 1974, came into force January 1998 and was updated in 2008. The Regulations apply in all premises and work situations in Great Britain subject to the HASAW Act, with the exception of diving operations and below ground in a mine (there is specific legislation dealing with confined spaces in these cases).

2 Purpose

- 2.1 The purpose of this policy is to outline the steps to be taken by LSW to ensure that its Estates staff or others (i.e. contractors) do not work in confined spaces where it can be avoided.
- 2.2 Where this is not possible a written suitable and sufficient risk assessment must be undertaken and a safe system of work developed.
- 2.3 LSW is committed to safely managing confined spaces, in compliance with applicable legislation and guidance. In order to comply with its duties LSW will ensure that:
 - 2.3.1 A Responsible Person (Confined Spaces) is appointed, having overall responsibility for the management of confined spaces; to give advice on the management of confined spaces, and to carry out audits of the confined spaces management regime.
 - 2.3.2 Authorised Persons are formally appointed to take responsibility for the day to day management of confined spaces.
 - 2.3.3 Suitable training is given to the Responsible Person, the Authorised Persons, and any LSW staff who may need to enter confined spaces.
 - 2.3.4 Contractors' staff needing to enter confined spaces shall provide evidence of competence in confined spaces for all those staff that will carry out the work.
 - 2.3.5 Where possible, entries into confined spaces are avoided or minimised. Where appropriate, entries into confined spaces are contracted to a specialist contractor, having the necessary skills, training and management systems.

- 2.3.6 A Confined Spaces Register for each site within LSW's estate is developed, maintained and updated, and containing risk assessment on each confined space with all the associated known hazards and controls.
- 2.3.7 Suitable safety equipment for entry into confined spaces is provided for directly employed staff, and is repaired, maintained and periodically inspected (contractors are required to provide their own equipment).
- 2.3.8 All entries into confined spaces are permitted only with a suitable risk assessment, a safe system of work, and under the control of a Confined Spaces Permit to Work from an Authorised Person.
- 2.3.9 All confined space entry teams comprise a minimum of **three** suitably trained members, including a Safety Person who continuously supervises the entry.
- 2.3.10 The confined spaces management regime is periodically audited and reviewed.

3 Definitions

- 3.1 **Confined Space** means any place such as ducts, vessels, culverts, tunnels, boreholes, manholes, excavations, sumps, inspection pits, experimental hutches, tanks, building voids, roof spaces or other similar space in which, by virtue of its enclosed nature there is a reasonably foreseeable risk of:
 - 3.1.1 serious injury from fire or explosion;
 - 3.1.2 loss of consciousness arising from increased body temperature;
 - 3.1.3 loss of consciousness or asphyxiation arising from gas, fume, vapour or lack of oxygen;
 - 3.1.4 drowning arising from increased levels of liquid; or
 - 3.1.5 asphyxiation from a free flowing solid.
- 3.2 A "**Risk assessment**" is a careful examination of what could cause harm to people at work, in order to decide on precautions to prevent that harm occurring.
- 3.3 A "**Safe System of Work**" is the systematic examination of a task in order to identify all hazards; it will include a detailed analysis of the materials and the equipment to be used, the environment and the people involved and affected. This information can be gleaned from risk assessments undertaken. It is important to involve employees that carry out the work or with detailed knowledge of the activity, so that the system of work produced is effective and practical as well as safe. Involving employees with the process helps them to understand why this level of control has to be established and maintained.

- 3.4 A “**Permit to Work**” ensures a formal check is undertaken to ensure all the elements of a safe system of work are in place before people are allowed to enter or work in the confined space. It is also a means of communication between site management, supervisors, and those carrying out the hazardous work. Essential features of a Permit to Work are:
- 3.4.1 clear identification of who may authorise particular jobs (and any limits to their authority) and who is responsible for specifying the necessary precautions (e.g. isolation, air testing, emergency arrangements etc);
 - 3.4.2 provision for ensuring that contractors engaged to carry out work are included;
 - 3.4.3 training and instruction in the issue of permits;
 - 3.4.4 monitoring and auditing to ensure that the system works as intended.
- 3.5 A “**Certified First Aider**” is a person who has undergone a four-day training course in administering first aid at work and holds a current first aid at work certificate following attendance at a training course from a Health & Safety Executive (HSE) approved provider.
- 3.6 “**PPE**” Personal Protective Equipment. Equipment issued free of charge to the employee by the employer in order to protect them, personally, from the risk of harm from certain activities. May include safety footwear, coveralls, gloves, goggles, hard hat etc.

4 Duties & responsibilities

- 4.1 The **Chief Executive** is ultimately responsible for the content of all policies, implementation and review.
- 4.2 **Director of Development** has delegated responsibility for the Estates Department to the Deputy Director of Finance (Capital & Estates).
- 4.3 The **Deputy Director of Finance (Capital & Estates)** is responsible for ensuring that systems are in place for confined space and restricted access work and that they meet the legal and organisational requirements.
- 4.4 The **Head of Estates** is responsible for ensuring that the requirements of this policy are observed and adhered in:
- a) all capital project work and other contract works managed by the Estates Department;
 - b) all Estates related work carried out by staff and external contractors;
 - c) developing and maintaining a Confined Space / Restricted Access Register together with risk assessments for each site.

4.5 The **Responsible Person (Confined Spaces)** is responsible for:

- 4.5.1 Ensuring that operational procedures and Permit to Work system for the safe management of confined spaces within LSW are developed, implemented, complied with, monitored, and periodically reviewed and updated;
- 4.5.2 Ensuring that the Confined Spaces / Restricted Access Register for each site is developed, maintained and updated by the Authorised Person(s) at that site;
- 4.5.3 Arranging the training and appointment of suitably qualified and experienced Authorised Persons (Confined Spaces);
- 4.5.4 Advise on the training of LSW staff, and advise on the minimum training standards that contractors operatives should meet;
- 4.5.5 Be responsible for tendering for third party confined spaces contractors, monitoring of planned maintenance and carrying out monthly performance reviews of key contractors;
- 4.5.6 Supporting and assisting the Authorised Persons (Confined Spaces) in their role, deputising where necessary;
- 4.5.7 Reporting any accidents, incidents and near misses relating to confined spaces, in accordance with LSW's Incident Reporting & Investigation Policy;
- 4.5.8 Ensuring that any deficiencies relating to confined spaces are logged for remedial action (including relevant risk registers), and where necessary, resources are requested;
- 4.5.9 Ensuring that an audit of the Confined Spaces management regime is carried out at least every three years;
- 4.5.10 Provide advice, on request, on all aspects of the management of confined spaces, including advice on the provision and maintenance of suitable safety equipment.

4.6 The **Authorised Person (Confined Spaces)** is responsible for:

- 4.6.1 Developing, maintaining and updating the Confined Spaces / Restricted Access Register for all LSW sites;
- 4.6.2 Ensuring that those LSW staff who may reasonably be expected to access confined spaces in the course of their duties receive suitable training on confined spaces, and that suitable records are kept and maintained;
- 4.6.3 Ensuring that LSW safety equipment, suitable for access into confined spaces, is provided, repaired, maintained (including any necessary

recalibration) and periodically inspected. Records of inspections and recalibration shall be kept for five years;

- 4.6.4 Ensuring that hired in confined space equipment comes from approved companies with proven safety record;
 - 4.6.5 Assessing, with colleagues, whether confined space entries are necessary, or whether they could be avoided;
 - 4.6.6 Assessing, with colleagues, whether services in confined spaces could be re-engineered so as to eliminate or reduce the necessity to access confined spaces;
 - 4.6.7 Ensuring responsibility for third party confined space contractors;
 - 4.6.8 Overseeing entries into confined spaces, ensuring that a suitable and sufficient risk assessment and safe system of work is in place prior to entry. Ensuring that every entry team comprises of at least **three** members, including a Safety Person, who will continuously supervise the entry. Authorising the Confined Spaces Permit to Work at the time and point of entry, having checked that the requirements of the safe system of work and the Permit to Work have been met, including the training and competency of the confined spaces entry team. This will include liaison with other Authorised Persons, Estates Officers and Supervisors who are managing the work to be undertaken within the confined space;
 - 4.6.9 Keeping suitable records of all confined spaces entries, including confined spaces checklists, risk assessments, safe systems of work and Permits to Work;
 - 4.6.10 Reporting any accidents, incidents and near misses relating to confined spaces, in accordance with LSW's Incident Reporting & Investigation Policy, including near misses, failed tasks and faulty equipment;
 - 4.6.11 Remediating any deficiencies in confined spaces management where resources permit, notifying the Responsible Person of any significant deficiencies, for entry by the Responsible Person onto risk registers and requests by the Responsible Person for any necessary additional funding;
- 4.7 **Estate Officers and Supervisors** are responsible for:
- 4.7.1 Ensuring that their staff and contractors are aware that entries into confined spaces are managed under these procedures, and are permitted only under the control of an Authorised Person (Confined Spaces);
 - 4.7.2 Ensuring that they attend confined spaces training and first aid training when requested to do so;
 - 4.7.3 Providing to the Authorised Person, for any LSW staff needing access into a confined space, at least 10 working days (excepting emergencies) prior to the proposed entry:

- a) Evidence of competence in confined spaces for all those staff that will carry out the work. This will include records of suitable confined spaces training within the last two years, evidence of confined space entries within the last two years, and for Safety Persons evidence that they are a qualified First Aider;
- b) A risk assessment and safe system of work for the confined space entry;
- c) Any necessary risk assessments and safe systems of work for entry and the work to be carried out within the confined space.

4.7.4 Ensuring that any contractor needing access into a confined space provides the Authorised Person, at least 10 working days (excepting emergencies) prior to the proposed entry, with:

- a) Evidence of competence in confined spaces for all those staff that will carry out the work. This will include records of suitable confined spaces training within the last two years, evidence of confined space entries within the last two years, and for Safety Persons evidence that they are a qualified First Aider. See section 5.4;
- b) A risk assessment and safe system of work for the confined space entry;
- c) Confirmation that their operatives will provide and use all necessary safety equipment (including PPE) to comply with the confined spaces safe system of work and the confined spaces Permit to Work;
- d) Certificates of conformity for all the safety equipment that will be used.

4.7.5 Ensuring that any contractor needing access into a confined space provides them (the person instructing the work), prior to the work, with a suitable and sufficient risk assessment and safe system of work for the work to be carried out within the confined space.

4.8 **Estates Project Managers** are responsible for:

- 4.8.1 Ensuring that their contractors and subcontractors are aware that entries into confined spaces are managed under these procedures (except where the site is handed over to the contractor, see note box below), and are permitted only under the control of an Authorised Person (Confined Spaces);
- 4.8.2 Ensuring that any contractor needing access into confined spaces provides the Authorised Person, at least 10 working days (excepting emergencies) prior to the proposed entry with:

- a) Evidence of competence in confined spaces for all those staff that will carry out the work. This will include records of suitable confined spaces training within the last two years, evidence of confined space entries within the last two years, and for Safety Persons evidence that they are a qualified First Aider. See section 5.4;
- b) A risk assessment and safe system of work for the confined space entry, including details of the PPE and safety equipment to be used (any necessary maintenance certificates to be furnished to the Authorised Person prior to entry);
- c) Confirmation that their operatives will provide and use all necessary safety equipment (including PPE) to comply with the confined spaces safe systems of work and the confined spaces Permit to Work.

4.8.3 Ensuring that any contractor needing access into a confined space provides them (the person instructing the work), prior to the work, with a suitable and sufficient risk assessment and safe system of work for the work to be carried out within the confined space;

4.8.3.1 Where a contractor is given sole control of their site (under CDM Regulations), they will be entirely responsible for the safe management of confined spaces entries within that site. Under these circumstances they may use their own confined spaces management arrangements.

4.9 **LSW Estates Staff** needing to access confined spaces are responsible for:

- 4.9.1 Being aware that entries into confined spaces are managed under these procedures, and are permitted only under the control of an Authorised Person (Confined Spaces);
- 4.9.2 Attending confined spaces training and first aid training when requested to do so, as may need to act as "Safety Person";
- 4.9.3 Ensuring that when engaged in a confined space entry they comply throughout with the confined space safe systems of work including the risk assessments, the confined space Permit to Work, supervision by the Safety Person leading the entry team, and any instructions from the Authorised Person overseeing the confined space entry;
- 4.9.4 Raising with the Authorised Person any concerns they have regarding confined spaces;
- 4.9.5 Reporting any incidents, accidents or near misses, in accordance with LSW's Incident Reporting & Investigation Policy.

4.10 **Contractors** needing to access confined spaces are responsible for:

- 4.10.1 Ensuring that their staff are aware that entries into confined spaces are managed under these procedures, and are permitted only under the control of an Authorised Person (Confined Spaces);
- 4.10.2 Providing the Authorised Person, at least 10 working days (excepting emergencies) prior to the proposed entry, with:
- a) Evidence of competence in confined spaces for all those staff that will carry out the work. This will include records of suitable confined spaces training within the last two years, evidence of confined space entries within the last two years, and for Safety Persons evidence that they are a qualified First Aider;
 - b) A risk assessment and safe system of work for the confined space entry, including details of the PPE and safety equipment to be used (any necessary maintenance certificates to be furnished to the Authorised Person prior to entry);
 - c) Confirmation that their operatives will provide and use all necessary safety equipment (including PPE) to comply with the confined spaces safe systems of work and the confined spaces Permit to Work;
- 4.10.3 Providing the person instructing the work, prior to the work, with a suitable and sufficient risk assessment and safe system of work for the work to be carried out within the confined space;
- 4.10.4 Ensuring that their staff comply throughout with the confined spaces safe systems of work, the confined spaces Permit to Work, and any instructions from the Authorised Person managing the confined spaces entry;
- 4.10.5 Reporting any incidents, accidents or near misses to the Authorised Person.
- 4.11 Responsibilities of **Safety Persons** irrespective of whether the confined spaces entry team comprises LSW staff or contractors, will lead every confined space entry team, and is responsible for:
- 4.11.1 Liaising with the Authorised Person, receipt of the authorised confined spaces Permit to Work, and subsequent sign-off of the Permit to Work on completion;
 - 4.11.2 Remaining for the duration of the entry at the confined spaces entry point;
 - 4.11.3 Supervising the confined space entry, and continuously supervising and communicating with the staff within the confined space;
 - 4.11.4 Ensuring that relevant safe systems of work (for confined space entry and any work within the confined space) are complied with;

- 4.11.5 Controlling all entry into and exit from the confined space, and preventing entry by non-authorized persons (including cardiac arrest teams);
- 4.11.6 Responding immediately in accordance with the SSOW emergency arrangements in the event of any accident or incident;
- 4.11.7 Rendering first aid where necessary;
- 4.11.8 Summoning the emergency services where necessary;
- 4.11.9 Reporting any problems or concerns to the Authorized Person;
- 4.11.10 Where the work in the confined space is remote from the entry point (and hence is remote from the Safety Person) a member of the team within the confined space may need to deputise for the Safety Person in respect of supervision of the work only. The Safety Person remains in overall control of the confined space entry team.

5 The avoidance & minimisation of confined spaces entries

5.1 Avoidance of Confined Spaces Entries

- 5.1.1 In some instances it may be possible to achieve the desired result without entering a confined space. The Confined Spaces Regulations require that entry into a confined space is prevented unless it is not reasonably practical to achieve the desired result without such entry;
- 5.1.2 Authorized Persons are therefore required, before they authorise any confined spaces entry, to satisfy themselves that each confined spaces entry is necessary and that the work could not be done without that entry;
- 5.1.3 It may be possible in certain instances to re-engineer services to remove maintenance items from confined spaces, and therefore eliminate the necessity of entering confined spaces. For example, it may be possible to relocate valves, pumps, pneumatic tube diverters, telecoms distribution boards, etc out of underground services ducts. This is recognised as the highest form of risk assessment control.

5.2 Use of Specialist Contractors for Confined Spaces Entries

- 5.2.1 It may be possible to minimise risk by the use of specialist contractors (having particular experience and expertise in confined spaces entries), where the work to be carried out falls within the competence of the contractor. An example would be employing a specialist drainage system contractor to deal with all deep drains and drain manholes;
- 5.2.2 However all confined spaces entries by such a contractor must be managed by an Authorized Person, in accordance with these management procedures.

6 The management of confined space entries

6.1 Site Registers of Confined Spaces

6.1.1 Authorised Persons will compile, maintain and update for their respective sites, one Confined Space Register (which will be placed on a shared Estates computer drive);

6.1.2 The purpose of these registers is to provide the information necessary for carrying out a confined spaces risk assessment and safe system of work. The information provided in these registers will include (but not be limited to):

- a) Description, location and any unique identifier for the confined space;
- b) Suitable entry and escape points;
- c) Asbestos status (please see the Asbestos Policy (Management of));
- d) Information on special restrictions (large, small, crawl, crouch, etc);
- e) Information on known or anticipated hazards and control measures (vertical access, heat, obstructions, flooding, poor lighting, etc);
- f) Summary results of gas monitoring for that confined space (i.e. whether any oxygen deficiency or toxic gases/fumes have ever been detected).

6.2 Provision of PPE and Safety Equipment

6.2.1 Advice shall be sought from the Authorising Engineer, by the Responsible Person and the Authorised Persons, on current applicable standards and suitable makes and types of PPE and safety equipment;

6.2.2 The provision, repair, maintenance (including any necessary recalibration) and periodic inspection of PPE and safety equipment for confined spaces entries by LSW staff shall be the responsibility of the Authorised Person for the site concerned. Records of inspections and recalibration shall be kept for five years;

6.2.3 The provision, repair, maintenance (including any necessary recalibration) and periodic inspection of PPE and safety equipment for confined spaces entries by contractor's staff shall be the responsibility of the contractor. Records of inspections and recalibration shall be kept for five years;

6.2.4 The PPE and safety equipment required for each confined spaces entry will be identified by the risk assessment, but the equipment required is likely to include some or all of the following:

- a) Safety footwear;
- b) Standard issue overalls or disposable overalls;
- c) Eye protection;
- d) Safety helmet or bump cap (with chin strap and no peak) – check fit, expiry date and condition prior to entry;
- e) Hand held torches (intrinsically safe) – check they are functional prior to entry;

- f) Safety notices posted at entrance (one per man in confined space);
- g) Escape set (one per person in confined space) – get serviced every six months;
- h) Facemasks to protect against dust;
- i) Hand held radios (one for every member of the confined spaces entry team, particularly the Safety Person leading the team) – check charged and functional prior to entry;
- j) Mobile phone with Safety Person – check charged and functional prior to entry;
- k) Safety barrier for access hatch;
- l) Gas monitoring equipment – check in-calibration, charged and functional prior to entry;
- m) Fall arrest equipment, including tripod – check inspected within previous six months and functional prior to entry;
- n) Access ladder – check security and condition prior to entry;
- o) First Aid Kit.

6.3 Risk Assessment and those Permitted to Enter a Confined Space

6.3.1 All confined spaces entries shall be preceded by a written risk assessment specific to the entry proposed. Failure to include relevant information in the risk assessment could lead to inadequate precautions in the subsequent system of work;

6.3.2 Any proposed entry into underground services ducts, plant rooms or roof spaces shall be checked against the asbestos register for that location, and the access restrictions detailed in that register complied with;

6.3.3 The hazards relating to confined spaces arise through the combination of the confined nature of the place of work and the possible presence of substances or conditions which, taken together, could increase the risk to the safety or health of people. A hazard can be introduced to a substantially enclosed space that would otherwise be safe. The most likely hazards specifically related to confined spaces include (but are not limited to):

- a) Flammable substances and oxygen enrichment:
 - i) Oxygen enrichment will increase flammability of clothing and other combustible materials;
- b) Toxic gas, fume or vapour:
 - i) Fumes may be given off by sludge;
 - ii) Fume and vapour can be produced by work inside the confined space (i.e. welding, flame cutting, painting, use of adhesives or solvents, etc);
 - iii) Gas and fumes can build up in sewers, manholes, contaminated ground etc;
 - iv) Vehicle exhausts discharging near confined spaces can introduce toxic fumes;
- c) Oxygen deficiency:

- i) A small reduction in oxygen levels can lead to a rapid impairment of mental ability, with no warning to alert the senses;
 - ii) Concentrations below 16% can lead to unconsciousness and death;
- d) Oxygen deficiency may result from:
- i) Purging the space with inert gas;
 - ii) Biological processes that consume oxygen;
 - iii) Rusting inside a closed steel vessel;
 - iv) Increased carbon dioxide levels from wet limestone chippings;
 - v) Welding, flame cutting or grinding;
 - vi) Use of liquid nitrogen for pipe freezing;
 - vii) Processes above ground producing fumes which are heavier than air and seep into the confined space, displacing oxygen;
- e) Ingress or presence of liquids:
- i) Liquids can flow into a confined space and lead to drowning or other serious injury;
- f) Solid materials which can flow:
- i) Free flowing solids can submerge a person, preventing breathing;
- g) Presence of excessive heat:
- i) This can lead to a dangerous rise in core body temperature, and can be made worse as a result of PPE being worn. The result may be heat stroke and unconsciousness;
- h) Other general hazards to be considered include:
- i) Slips, trips and falls;
 - ii) Manual handling hazards;
 - iii) Burns from hot surfaces;
 - iv) Head injury from obstructions within the confined space;
 - v) COSHH hazards;
 - vi) Starting up of machinery, without realising that persons are working inside or adjacent to the machinery;

6.3.4. All participants in the entry (including the Safety Person) shall be confined spaces trained to an appropriate standard;

6.3.5 Checklists, risk assessments and safe systems of work shall be prepared by:

- a) For work by LSW employees – relevant Estates Officer or Supervisor;
- b) For work undertaken by Contractors – Contractor's Manager / Supervisor.

6.4 Safe System of Work for Confined Spaces Entry

6.4.1 Following the risk assessment, a safe system of work shall be developed, documented and checked. Issues to be considered within a safe system of work include:

- a) Supervision
- b) Competence for confined space working
- c) Communication
- d) Testing/Monitoring the atmosphere
- e) Gas purging
- f) Ventilation
- g) Removal of residues
- h) Isolation from gases, liquids, and other flowing materials
- i) Isolation from mechanical and electrical equipment
- j) Selection and use of suitable equipment
- k) Personal protective equipment and respiratory protective equipment
- l) Portable gas cylinders and internal combustion engines
- m) Gas supplied by pipes and hoses
- n) Access and egress
- o) Fire prevention
- p) Lighting
- q) Static electricity
- r) Smoking
- s) Emergencies and rescue
- t) Limiting the working time
- u) Fitness and health of participants in entry
- v) Environmental conditions (i.e. hot and/or humid environment)

6.4.2 Confined space entry teams will comprise a minimum of **three** persons, one of these being the Safety Person. All confined spaces entries will involve the following participants:

- a) The Authorised Person overseeing the entry;
- b) The Safety Person leading the confined space entry team. The Safety Person will have received training in confined spaces and will also be a certified First Aider. The Safety Person will remain at the confined spaces entry point for the duration of the entry, will supervise the entry, and will immediately respond following the emergency procedures in the event of any accident or incident;
- c) The other members of the confined spaces entry team will have received confined spaces training (see sections 5.3 and 5.4), and will work under the supervision of the Safety Person;
- d) Consideration **must** be given to the health and fitness of proposed participants in the entry:
 - i) Those who suffer from claustrophobia, fainting, intolerance to heat (if the environment will be hot), hypoglycaemia, etc should not participate;

- ii) Those having a size or shape incompatible with the entry should not participate;
 - iii) Anyone suffering from diabetes should be carefully checked before entry, to ensure that their intake of fluids and food is sufficient;
 - iv) Anyone feeling unwell should not participate.
- e) Note that a separate risk assessment and safe system of work may be necessary for the work that will be carried out once the confined space has been entered. These will be separate from, but complementary to, the confined spaces risk assessment and confined spaces safe system of work. The Authorised Person (Confined Spaces) supervising the confined space entry is responsible for checking that the confined spaces risk assessment and confined spaces safe system of work are adequate. Checking the separate risk assessment and safe system of work for the work to be carried out once the confined space has been entered is the responsibility of the person instructing that work.

6.5 Emergency Arrangements

6.5.1 Arrangements will depend on the nature of the confined space, the risks identified, and the likely nature of an emergency rescue. Account needs to be taken not only of accidents arising from a specified risk, but also any other accident in which a person needs to be recovered from a confined space.

6.5.2 Suitable emergency arrangements will need to consider:

Issue	Control Measures
Rescue & resuscitation equipment	The risk assessment and safe system of work will identify what rescue equipment is necessary. This may include harnesses, lifelines, lifting equipment and escape sets, etc. It is essential that such equipment is set up ready prior to any entry. Each confined space entry is different, and the risk assessment and safe system of work must be specific to the entry being planned.
Raising the alarm and rescue	The participants in the confined spaces entry will have a suitable means of communication, as set out in the risk assessment and safe system of work (whether visual, verbal, radio's, rope, etc), and the Safety Person will at all times have a charged and functional mobile phone to enable the emergency services to be contacted. For high risk confined spaces entries (particularly where there is a significant risk of toxic fumes or oxygen deficiency i.e. fuel oil tanks), the Authorised Person shall arrange for a suitably trained and experienced contracted-in rescue team to be on site, set up and immediately available.
Safeguarding the rescuers	The confined spaces training regime will cover this issue, and the necessity of considering the risks before joining those in difficulty.
Fire safety	Any necessary advice on fire safety precautions may be obtained from the Fire Safety Advisor.

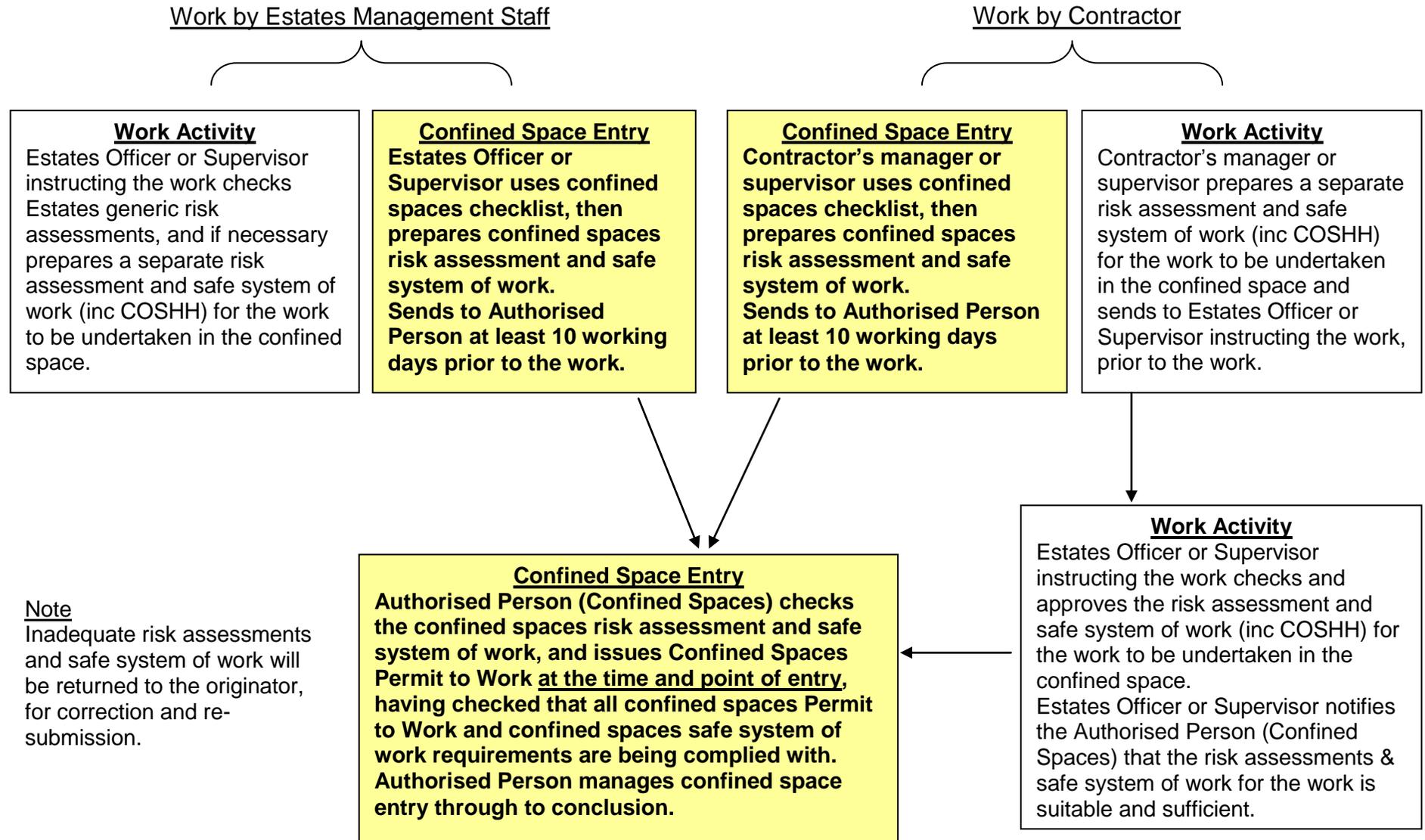
Issue	Control Measures
Control of plant	There may be a need to shut down adjacent or nearby plant before attempting an emergency rescue. The shutting down of plant and equipment should be considered when preparing the safe system of work.
First aid	The safe system of work should address how first aid can be delivered to someone within a confined space. The Safety Person must be a certified first aider.
Public emergency services	<p>The Safety Person will at all times have a charged and functional mobile phone to enable the emergency services to be contacted.</p> <p>For high risk confined spaces entries (particularly where there is a significant risk of toxic fumes or oxygen deficiency i.e. fuel oil tanks), the Authorised Person shall arrange for a suitably trained and experienced contracted-in rescue team to be on site, set up and immediately available.</p>
Training	See Section 7

6.6 Confined Spaces Permit to Work System

- 6.6.1 The Authorised Persons shall make use of a proprietary Permit to Work paperwork, developed specifically for managing work in confined spaces, procured by the Responsible Person, and as approved by the Authorising Engineer;
- 6.6.2 Every confined spaces Permit to Work will specify the names of the confined spaces entry team and their specific roles, particularly that of Safety Person;
- 6.6.3 Confined spaces permits to work shall only be authorised by an Authorised Person **at the time and point of entry**, and only after having checked that all the safety requirements of the safe system of work and Permit to Work have been met. Before signing the Permit to Work the Authorised Person must also check that the entry team members:
- a) Are fit and well;
 - b) Are not liable to suffer from claustrophobia, fainting, intolerance to heat, hypoglycaemia, etc;
 - c) Are of a size and shape compatible with the entry;
 - d) Have received sufficient intake of fluids and food, particularly if diabetic;
- 6.6.4 The Authorised Person is not expected to stay in the vicinity of the entry for the whole duration of the entry, but is expected to ensure (periodically checking either in person or by a colleague) that those undertaking the entry are safe and continue to comply with the confined spaces safe systems of work and the confined spaces Permit to Work;

- 6.6.5 The Safety Person leading the confined spaces entry team will continuously supervise the entry, and will remain for the duration of the entry at the confined spaces entry point;
- 6.6.6 On completion of the confined spaces entry the Authorised Person shall sign off the confined spaces Permit to Work. All relevant paperwork (checklist, risk assessment, Permits to Work, etc) shall be retained by the Authorised Person for five years.

6.7 Flow Chart for Confined Spaces Management Process



Note
Inadequate risk assessments and safe system of work will be returned to the originator, for correction and re-submission.

6.8 Accidents, Incidents and Near Misses

- 6.8.1 All accidents, incidents and near misses shall be reported, by the Authorised Person managing the entry, in accordance with LSW Incident Reporting & Investigation Policy;
- 6.8.2 Health & Safety Services will notify the Health & Safety Executive (HSE) of any accidents or incidents that are reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) relating to LSW staff, patients or members of the public;
- 6.8.3 Contractors are legally required to notify HSE of any accidents or incidents that are reportable under RIDDOR relating to their employees or subcontractors. They must also inform the Authorised Person of any accidents, incidents or near misses.

7 Training implications

- 7.1 The Responsible Person (Confined Spaces) will undergo specialist training from an accredited training provider, to allow them to adequately discharge the duties of Responsible Person (Confined Spaces). A suitable course is City & Guilds training course “Overseeing work in confined spaces in the water industry” Unit 6150-04, or equal and approved by the Authorising Engineer (Confined Spaces).
 - 7.1.1 The Responsible Person (Confined Spaces) will periodically undergo refresher training, normally every three years.
- 7.2 The Authorised Persons (Confined Spaces) will undergo specialist training from an accredited training provider, to allow them to adequately discharge the duties of Authorised Person (Confined Spaces). A suitable course is City & Guilds training course “Overseeing work in confined spaces” Unit 6150-04, or equal and approved by the Authorising Engineer (Confined Spaces).
 - 7.2.1 The Authorised Persons (Confined Spaces) will periodically undergo refresher training, normally every three years.
- 7.3 All LSW Estates staff that may reasonably be expected to access confined spaces in the course of their duties must undergo suitable confined spaces training every three years. A suitable course is City & Guilds “Working in medium risk confined spaces in the water industry” Unit 6150-02, or equal.
- 7.4 All confined spaces entry teams must include a Safety Person, who continuously supervises the entry and remains for the duration of the entry at the confined spaces entry point. Safety Persons must be certified First Aiders, as well as having received confined spaces training.

7.5 Minimum training requirement for Contractor Staff

7.5.1 Contractors needing to enter LSW confined spaces will be required to have received, prior to the entry, confined spaces training from an accredited training provider covering the following areas :-

- a) Requirements of the Confined Spaces Regulations 1997;
- b) Personal protection and hygiene requirements;
- c) Risk assessing residual hazards;
- d) Types of gaseous atmosphere, portable gas monitoring equipment and its use;
- e) The use of harness tripod/man-riding winch, fall arrest and safety line;
- f) The use of escape breathing apparatus as part of a self-rescue procedure;
- g) Safe entry working and exit procedures and exit procedures at confined spaces;
- h) Emergency procedures and practical exercises;
- i) Knowledge and skill assessment exercises for planning, entering, working and exiting confined spaces using escape-breathing apparatus as a part of the planned means for self-rescue;
- j) Practical skill assessment and written examination;

7.5.2 The above requirements will be met by training course City & Guilds "Working in medium risk confined spaces in the water industry" Unit 6150-02, or equal and approved by the Authorising Engineer (Confined Spaces);

7.5.3 They will also be required to demonstrate that they have carried out confined space entries within the last two years, and that they remain competent for work within confined spaces.

7.6 All confined spaces entry teams must include a Safety Person, who continuously supervises the entry and remains for the duration of the entry at the confined spaces entry point. Safety Persons must be certified First Aiders, as well as having received confined spaces training.

8 Monitoring compliance

8.1 The Responsible Person shall ensure that an audit is undertaken of the confined spaces management regime, by the Authorised Person (Confined Spaces), at least every two years. The Responsible Person, assisted by the Authorised Persons, shall take appropriate action to address any issues identified by the audit.

8.2 Regular maintaining and monitoring of the Confined Spaces / Restricted Access Register for all LSW sites.

8.3 Regular monitoring of all reported incidents involving confined spaces.

- 8.4 The Authorised Person (Confined Spaces) will monitor the performance of Contractors, Persons in Charge and Work Teams in carrying out their duties. Monitoring is to be carried out on a continuing basis and is to include:
- 8.4.1 Spot checks on work in progress for compliance with safety method statements, permits, sanctions, standing instructions and other documents;
 - 8.4.2 Checking safety equipment;
 - 8.4.3 Random visits to the point of work.

All policies are required to be electronically signed by the Lead Director. Proof of the electronic signature is stored in the policies database.

The Lead Director approves this document and any attached appendices. For operational policies this will be the Locality Manager.

The Executive signature is subject to the understanding that the policy owner has followed the organisation process for policy Ratification.

Signed: Director of Finance

Date: 20th January 2016