

30 Permit to Work

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Introduction

1. This chapter sets out the procedures and guidance for the use of Permits to Work (PTW) to manage hazardous Defence activities with a high level of residual risk not already covered by Permit to Work procedure in JSP 375, Volume 3.
2. The MOD has a statutory duty to provide and maintain plant and systems of work, that are; so far as is reasonably practicable, safe and without risk to health. For high-risk activities, it is good practice to set-up a PTW system. The harmonisation of PTW systems between different locations can provide a familiar format and assist personnel moving between locations to understand the required controls and procedures to manage high risk activities. As systems become more complex, it is essential to coordinate them and understand inter-dependencies using the Safety and Environmental Case approach. It is therefore recommended that all new PTW systems or the revision / review of existing PTWs use the principles, guidance and templates contained within this leaflet.
3. A PTW is an effective means of controlling hazardous work activities and is a key element of the hierarchy of risk controls¹. It shall be a formal written authority to a named competent person to closely control an activity or process, to which, following a risk assessment and the formulation of a Safe System of Work or a method statement, a high level of risk still exists. A PTW is the formalisation of a Safe System of Work but is not a guarantee of absolute safety.

When Should a Permit to Work be Used?

4. A PTW should be used whenever it is intended to carry out any work which may adversely affect the safety of personnel, the environment or plant and equipment where assessment and the existing Safe System of Work do not fully mitigate the level of risk. A PTW is normal part of good-practice used as one of many risk control measures for activities such as maintenance work.
5. It is also advisable to use PTWs when two or more individuals or groups of people, perhaps from different trades or different contractors, need to co-ordinate their activities to ensure that they do not compromise the safety of each other; each

¹ Management H&S at Work Regulations 1999, Schedule 1

will be issued with a permit. This will apply equally when there is a transfer of work and responsibilities from one group to another.

Roles and Responsibilities

Commanding Officer (CO) / Head of Establishment (HoE)

6. Where no Duty Holder is appointed, the CO or their supporting HoE shall be responsible for the appointment of Sanctioning Officers (SO) and shall satisfy themselves that the SO is competent, with sufficient knowledge and experience of the task, hazards and potential risks involved with the activity to evaluate and sanction the PTW on their behalf. The SO shall be provided with a letter of authority or Terms of Reference (TORs) defining the types of PTW that they are authorised to sanction. A process shall be put in place to ensure that no more than one SO is on Duty in any one shift to sanction a PTW and that control systems are assured.

Managers

7. The manager (owner of the task) shall be responsible for ensuring that a risk assessment has been undertaken prior to requesting a PTW to be raised and that a suitable Safe System of Work / method statement has been drafted by a competent person (seeking specialist advice if necessary). Reporting managers should ensure that all controls measures have been implemented so that when the PTW is issued that each party are confident that the risks are as low as is reasonably practicable (ALARP) and acceptable for the work to commence on the designated task, area or plant for the time specified.

Sanctioning Officer (SO)

8. The SO shall have suitable knowledge, experience and the authority to take action (e.g. refuse to issue, withdraw, or close a PTW) as necessary. Before issuing the permit, the SO is to be satisfied that suitable risk assessments and Safe Systems of Work etc have been developed and all necessary precautions have been taken, and in conjunction with the manager, that any work activities that may interact are identified and de-conflicted. Any PTW shall only be valid when signed by the SO giving their authority to proceed (e.g. section 5 of MOD Form 5071) and should be signed off by the SO when the activity has been completed or work ceased (e.g. section 8 of MOD Form 5071). All PTWs shall be recorded on a PTW register (e.g. MOD Form 5072) or similar control system prior to issue and on closing.

9. The sanctioning officer is the only person who is authorised to sign for authority to proceed and the sanctioning officer's declaration (e.g. PARTS 5 and 8 on MOD Form 5071). The SO shall periodically monitor PTW tasks to ensure that the conditions of PTWs are complied with.

Person in Charge (Supervisor)

10. The PTW should be issued to the Person in Charge (PiC) of the work, who must be competent, understand and agree to the conditions of the permit. The PiC will be the person who physically supervises the task or activity and accepts the responsibility for ensuring compliance with the requirements of the PTW by signing a declaration (e.g. section 6 of MOD Form 5071). Such persons shall be held responsible for directly controlling the task as detailed on the PTW and must always be present at the location where the activity is being carried out and able to provide close supervision for the duration of that activity.

11. The PiC shall ensure that they are fully conversant with, and able to ensure compliance with the conditions set out in the PTW and all documentation associated with the task, that the PTW is displayed at the point of work, and that all personnel involved in the activity / task are fully briefed, competent and adequately trained.

12. Each PiC shall ensure that any additional actions required by the PTW are in place including additional emergency arrangements and that all necessary safety and emergency equipment is available, suitable and safe for use before commencing the task and that only the task detailed on the PTW is carried out. If the conditions of the PTW cannot be met work must stop immediately and all personnel withdrawn, and when safe to do so, all tools, plant and equipment and the area made safe.

13. If the PiC leaves the point of work, the task shall be stopped, and the area made safe until they return.

14. The PiC must ensure that all personnel directly affected by the activities of the PTW have been briefed to ensure they are aware of the hazards and control measures and are subsequently kept informed of any changes of the task.

15. If the task is not completed within the specified working time, the SO shall determine how the task is to be stopped, the area made safe and the permit closed. A new permit shall be raised and issued to the next PiC taking over the responsibility for the continuance of the task where the permit is issued to the individual PiC not to the task. Under no circumstances can the same person carry out the duties of the SO and be the person in charge of the task / activity.

All Personnel

16. All Defence personnel should comply with all information, instruction, training (including Safe Systems of Work) as required by management and in accordance with the requirements of any PTW. Personnel should inform the manager of any defective control measures, or any physical or medical condition that could affect the findings of the risk assessment and their ability to undertake the activity safely so that appropriate corrective action can be taken.

Retention of Records

17. The original signed copy (working copy) of the PTW shall be issued to the PiC and a copy retained by the SO for the duration of the task. Upon completion of the task the original (working copy) should be returned to the SO who should complete and sign off the PTW. The original (working copy) should be filed together with any associated unique supporting documentation and retained for a minimum of three years in accordance with JSP 375, Volume 1, Chapter 39 (Retention of Records)

18. The Register of PTWs should be retained for a minimum of three years following the last entry, or as defined by maintenance records.

Related Documents

19. The following documents should be consulted in conjunction with this chapter:

- a. JSP 375, Volume 1:
 - (1) Chapter 08 – Risk Assessment;
 - (2) Chapter 15 – Personal Protective Equipment (including RPE); and
 - (3) Chapter 39 – Retention of Records.
- b. JSP 375 Part 2, Volume 3:
 - (1) Chapters 2 to 8.
- c. Other MOD Publications;
 - (1) DSA01.1 – Defence Policy for Health, Safety and Environmental Protection;
 - (2) DSA01.2 Chapter 2 – Requirement for Safety and Environmental Management Systems in Defence; and
 - (3) DSA02 Regulations as required.

