

Permit to Work Procedure

WNH Q25 - Revision 2.0

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Revision History

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Contents

1.0	This Document	2
1.1	Purpose	2
1.2	Scope	2
2.0	The Permit to Work System	3
2.1	Overview	3
3.0	When is a PTW Required	4
3.1	Overview	4
4.0	General Principles of the Permit to Work	5
5.0	Delineation of Work Sites	6
5.1	Principles of Delineation	6
6.0	Roles & Responsibilities	7
6.1	General	7
6.2	Project Manager or Job Manager	7
6.3	Authorised Issuing Officer	8
6.4	Person In Charge	9
6.4.1	Transfer of PIC	10
6.5	Worker	11
6.6	Visitors to Worksite Controlled by a PTW	12
7.0	Supporting Systems and Processes	13
8.0	Permit to Work Numbering	14
8.1	Overview	14
8.2	Master & Subsidiary PTW Numbering	14
9.0	Definitions	15
10.0	Accountabilities	16
11.0	References	17

1.0 This Document

1.1 Purpose

The purpose of this procedure is to reduce the risk of impact, injury or environmental harm in high-risk work sites, As Far As Reasonably Practicable (AFARP), by providing a permit to work (PTW) (a work control system) for the management of such work. This document defines specific responsibilities and actions for those planning, authorising, managing, and working on work sites covered by a PTW, and establishes a standard and consistent approach.

1.2 Scope

This procedure applies on all Woolnorth Renewables (WNR) worksites and shall be used if any activity involves high risk or complex activities, as defined in the procedure. It provides the overarching framework for safe work management and utilises the fundamental risk management processes outlined in the Risk Management Procedure (WNH Q14). The associated Permit to Work (WNH Q25.1) provides the template for practical application of the PTW system. It may be necessary for these two documents to be read in conjunction with this Procedure.

2.0 The Permit to Work System

2.1 Overview

The Permit to Work (PTW) system defines a single approach for ensuring jobs and activities of a high-risk nature are effectively managed, with appropriate review, approval and hold points. The PTW pulls together the relevant operational and risk management documents for a project or activity into one location to ensure they are available at these planning and review hold points, and during the course of works, for any person or manager to review and reflect on during the activity. The typical structure of an enforced PTW is provided in Figure 1. The PTW system is supported by several key roles (described further in section 6), those being,

Project Manager (PM) or Job Manager (JM) (which one depends on the scale of the activity) – planning, administration, document preparation and facilitation of review, initial project approval.

Authorised Issuing Officer (AIO) – document preparation and review, worksite preparation, group, and remote isolations.

Person in Charge (PIC) – document review, work site preparation, management of work teams.

Worker – read and understand documentation, completion of work.

Safety Observer – document review, monitoring of specific activity.

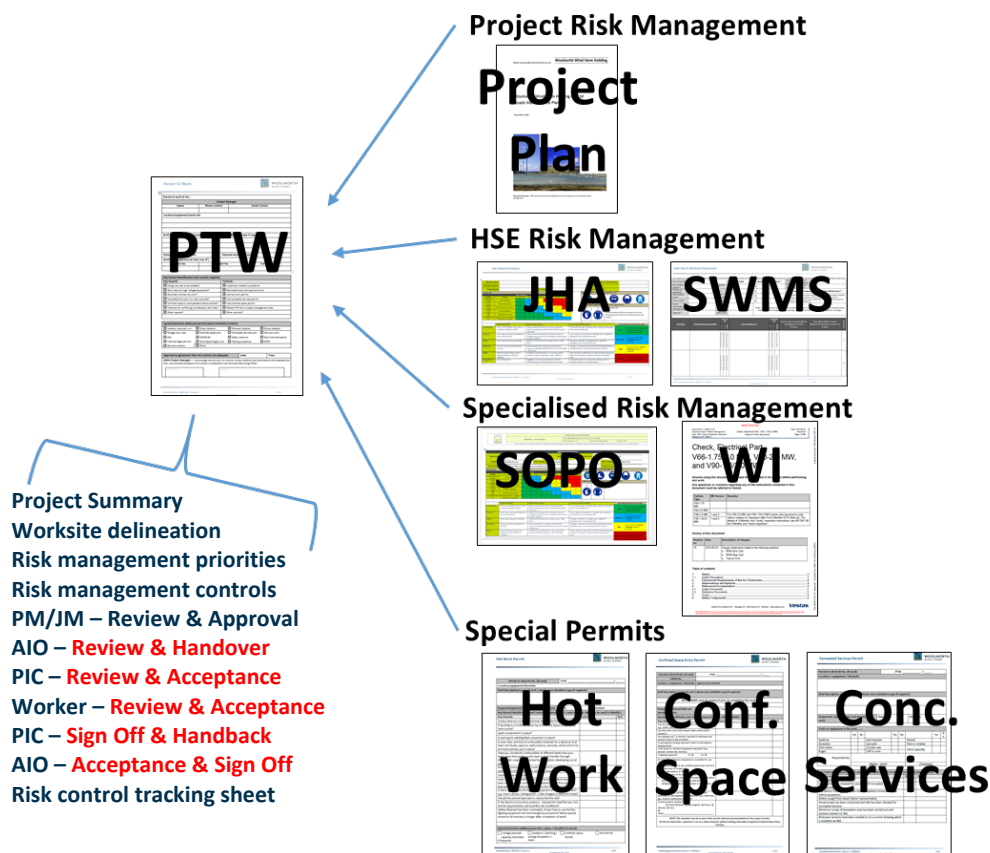


Figure 1. Structure of a Permit To Work (PTW) and the potential documents that may be appended to it e.g. JHA – Job Hazard Analysis, SWMS – Safe Work Method Statement, SOPO – Schedule of Safe Operations, WI – Work Instructions.

3.0 When is a PTW Required

3.1 Overview

Figure 2 outlines the circumstances or types of activities for which a Permit To Work (PTW) is **mandatory** to be issued. A PTW can, however, be utilised for any activity if a PM or JM deem that improved safety, environmental or operational outcomes are likely to be achieved as a result of its use.

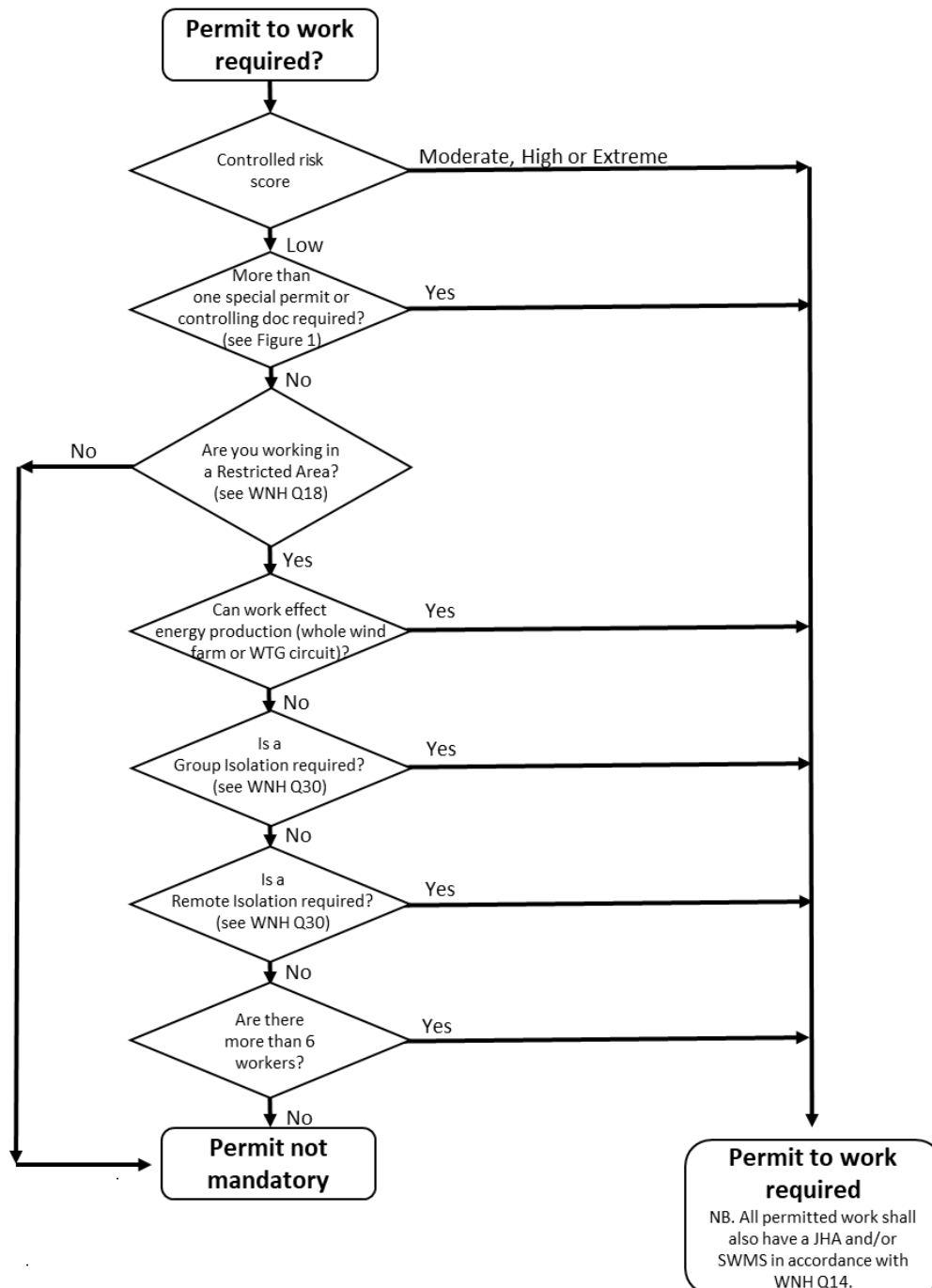


Figure 2. Permit to Work flow chart outlining the work activities for which a PTW is mandatory. Examples of special permits are provided in Figure 1.

4.0 General Principles of the Permit to Work

The following points outline the general principles of the PTW system. If a situation arises where the principle of the PTW system cannot be applied, or are inadequate/insufficient, all attempts will be made to document them and apply a relevant control measure/s.

- a) **no PTW shall be issued** by the PM/JM until they agree with the AIO that adequate planning and preparation has occurred,
- b) **no PTW shall be transferred** prior to the AIO and the PIC agreeing that adequate planning and preparation has occurred,
- c) no changes to the content and detail provided by a PTW shall be made without the knowledge and **consent of the AIO** while they are signed on to the PTW,
- d) the PTW and associated documentation is the “**source of truth**”, as such it shall accurately record what was agreed and done. If there is any uncertainty or clarification required regarding the scope or the equipment to be worked on, all parties shall refer to the PTW,
- e) if during work the PTW documentation is found to not **accurately reflect the work** or access required (or is ambiguous), all activity shall stop and not proceed until the PTW is reviewed with the AIO and alignment between the activity and the documentation is achieved,
- f) the roles of PM/JM, AIO and PIC should be **performed by different people** for a PTW. This is to ensure a level of independence and critical review. By not doing this the risk of undetected errors increases,
- g) where it is not practical, to have different people in the roles, additional vigilance is required when checking the risk controls are correctly identified and actioned. This risk shall be specifically considered in a JHA and **approved in writing** by the PM,
- j) the issue, receipt and hand back of a PTW and the transfer of PIC shall only occur **at the location/work site**, unless a suspension or cancellation of the PTW takes place,
- k) a PTW can only be **issued by an AIO** to a PIC. The PIC shall independently determine that safe conditions exist at the worksite noting all hazards/danger points, control measures and/or conditions for testing, prior to accepting the PTW,
- l) **multiple PTW's** can be issued on the same or adjacent assets, plant, equipment or property, providing that the delineated work site for each PTW is established and shall not be entered without approval of the relevant PIC,
- m) in such cases, an over-arching permit (**master permit**) may be required that focused solely on the management and risks associated with the coordination and delineation of these worksites,
- n) the PTW shall be readily available for inspection at the location/work site at all times that the work party is on site, unless the PTW is suspended in which case it will be kept in a secure place by the AIO. The original of any PTW which has isolation points shall be kept in the PTW sleeve, **locked to the group isolation board**,
- o) PTW number and details shall be recorded on the respective wind farm's **operational log**,
- p) **cross-locking** where an isolation point is required under the SOPO of two or more separate PTWs, will be achieved by using a hasp and group isolation locks from the AIO of the respective PTWs. Any cross locking would have to be included on the SOPOs of both permits that are overlapping,
- q) in addition to the PTW, **other permits** may be required, e.g. hot work, confined space, and concealed services, where required these permits shall be identified on the PTW,

5.0 Delineation of Work Sites

Work site delineation is provided to direct movement of the work party to and from the area in which it is safe to work under the terms and conditions of the permit to work.

5.1 Principles of Delineation

All delineated work sites **shall**:

- a) be established prior to the issue of the permit to work;
- b) be defined by barrier markers erected to indicate, as clearly as possible, the work site in which work is to be performed. Where it is not possible and/or practicable to use physical barrier markers, approved procedures **shall** be followed;
- c) be arranged so that the equipment to be worked on is accessible without interfering with the barrier markers;
- d) have a clearly defined entry point. This may require separate entry points for personnel and vehicles;
- e) have appropriate barrier markers and/or signs placed at points where it is possible to move into the safe approach distance to conductors, which **shall** be regarded as energised;
- f) have appropriate barrier markers and/or signs placed at points where other hazards exist, e.g. excavations.

Employees **shall** not cross under/over or interfere with barrier markers that delineate a work site except in an emergency situation that threatens the safety of personnel, equipment or the environment and then only with due consideration for personal safety.

6.0 Roles & Responsibilities

6.1 General

The following roles shall be fulfilled for any work that is being managed under a PTW. These roles should be performed by different people. This is to ensure a level of independence and critical review. By not doing this the risk of undetected errors increases. Where it is not practical to have different people in the roles, additional vigilance is required when checking the risk controls are correctly identified and actioned. This risk shall be specifically considered in a JHA and at a minimum there should always be separate personnel fulfilling the PM and AIO roles. For any work or projects that are not managed under a PTW, it is expected that these roles are still in place where relevant.

6.2 Project Manager or Job Manager

Project Managers (PM) and Job Managers (JM) are differentiated by the scale of the activity they are managing. As examples, PM would typically refer to a person responsible for all aspects of a complex wind farm outage whereas a JM would refer to someone managing a task completed within a short timeframe (<1 shift), such as a WTG transformer inspection. In relation to the permitting and isolation requirements, the role of PM or JM are largely the same and are as follows:

- design and prepare a description of the works to take place, project plan that is produced in close consultation with the designated Authorised Issuing Officer (AIO) for the project, ensuring the exact equipment and extent of the work site are described,
- ensure all aspects of the planning of the job or project are completed, either by themselves if competent or through delegations to suitably competent personnel,
- in consultation with the AIO, determine a suitably competent and experienced PIC(s) that is willing to do the work.
- schedule the project with relevant business personnel (e.g. site supervisors, engineers and advisors) which should include an outline of their required inputs for the project and opportunities to review the project plan prior to the handover of the permit to the AIO,
- ensure relevant approvals and compliance requirements with external authorities such as network regulators are in place,
- organise for all staff and contractors involved in the project to have completed all training and inductions relevant to the activity and ensure all administrative requirements for contractors are completed e.g. contracts, insurances and licenses,
- the PM must ensure that the AIO and the intended PICs hold the necessary WNR authorizations.
- The PM and AIO must ensure that all necessary resources for the job are organized and available for the job (signage, locks, hasps, tags, specialist PPE, any paper-based resources).
- prepare and coordinate the review of all relevant operational (work instructions, SOPOs etc) and risk management (e.g. JHA, SWMS, special permits, SOPOs) documents to be attached to the permit, and,
- authorise and handover the PTW to the AIO.

6.3 Authorised Issuing Officer

The role of the AIO is as follows:

- review and assist in the preparation of the operational and risk management documentation being prepared by the PM/JM for the activity;
- authorise and issue the PTW to the PIC **on-site**, which shall include a joint visual inspection of the controls and isolations for the project as far as reasonably practical,
- ensuring that they have authorisation from WNR and are competent and confident to fulfil the role of the AIO at the work site and for the work scope;
- in the case for Remote Isolations, a Coordinating AIO is to be defined for the entire activity as well as the Remote AIO/s. The coordinating AIO shall be responsible for the coordination and communication between all the AIOs and PICs in regard to the isolation of all plant and energy sources relevant to the activity, as described in the SOPO for that activity.
- ensuring that the equipment/work site is safe for work, prior to issuing a PTW;
 - preparing schedule of planned operations (SOPO), which reflects the scope and all activities identified in the PTW and arranging independent checking of the SOPO,
 - performing plant isolations using “Danger – Do Not Operate” tags and yellow isolation locks in accordance with the prepared and checked SOPO;
 - confirm the need for, extent of, and establish work site delineation at all stages of the PTW process;
 - liaising with the PIC prior to a PTW being issued to determine whether the PIC intends to use any special tooling, vehicle or plant which may have a bearing on the preparation/delineation of the work site;
 - liaising with the PIC to ensure the description of work accurately describes the work to be performed;
 - liaising with the PIC to ensure additional control measures and/or conditions for testing are detailed on the PTW; and
 - where the AIO determines that a safety observer is required in addition to previously determined and agreed control measures, the appointment is made in consultation with the PIC.
- ensuring that a PTW is issued only to employees who hold current PIC authorisation, and who present as competent and confident to lead the work covered by the PTW. This includes situations where the PIC changes during the operation of the permit to work;
- in consultation with the PM and PIC (s) determine the requirements for safety observers;
- giving permission to commence work and receiving hand back of a PTW in liaison with the PIC;
- describing the status of the equipment/work site, hazards/danger points and any relevant information to the PIC and, if possible, to the Workers;
- identifying and approving the conditions under which isolation, operational earths and additional safety measures can be varied for testing. The responsibility for varying the conditions may be delegated to the PIC following approval by the AIO, as outlined in the PTW;
- restoring the plant back to service after PTW hand back if safe to do so.

Note: The AIO shall not alter any isolations, even when all work party and PIC personal isolation locks have been removed, unless explicitly agreed and directed by the PIC and the PIC subsequently advises the whole work party. Any changes to isolations will be approved in writing with peer review from another AIO experienced with the specific plant.

6.4 Person In Charge

The role of the PIC is as follows:

- ensuring that they have authorisation from WNR and are competent and confident to fulfil the role of the PIC at the work site and for the work scope;
- ensuring that work is understood and carried out by the work party in accordance with the scope, work site boundaries and risk managements controls identified on the PTW;
- controlling the work site and the work by:
 - being present to the extent necessary to fully exercise responsibility;
 - transferring responsibility to another PIC; and
 - ceasing work and removing all persons from the work site if unable to immediately appoint another person in charge.
- removing any person deemed unsuitable from the location/work site;
- in addition to any previously completed risk assessments, conduct regular Take 5 assessments to ensure any additional or changed conditions that have changed risk, are considered and controlled;
- ensuring a current copy of the PTW Procedure (WNH Q25) and Isolation Procedure (WNH Q30) shall be readily available at the location/work site;
- maintaining familiarity, complying with this procedure and any/all amendments as they occur.
- determining that the AIO is authorised to issue the PTW;
- liaising with the AIO prior to a PTW being issued and informing the AIO of any intended use of special tools, vehicles or plant which may have a bearing on the preparation/delineation of the work site;
- liaising with the AIO to ensure the description of work accurately covers the work concerned;
- liaising with the AIO to ensure all agreed risk control measures, including all isolations, are implemented;
- ensuring that the equipment/work site covered by the PTW is safe for work;
- receiving and being in control of the PTW until transferred to another PIC by locking the PTW to the Group Isolation lock box in a permit sleeve, or handed back, or surrendered if cancelled;
- ensuring the original of the PTW shall be readily available at the location/work site at all times that the work party is on site;
- ensuring that Workers operating under the PTW:
 - are familiar with their responsibilities;
 - understand the extent of the location/equipment/work site covered by the PTW;
 - understand the extent of the hazards/danger points present and agreed controls;

- have signed on the PTW;
- have placed a personal lock on to the group isolation lock box and have signed onto any special permits required; and
- work safely.
- appointing a safety observer, competent for the task and environment, as agreed as a PTW control or with the authorised issuing officer prior to the work commencing or as the need arises during the work activities;
- ensuring, where testing is approved, all Workers, cease work, remove their personal isolation locks, and sign off the PTW prior to commencing testing. All testing procedures will be written in the risk assessment documentation and SOPO prior to the job starting. The PIC shall ensure the work party lock on to the isolations in place for the testing. The PIC must ensure that on completion of testing; all isolations are fully restored, and all Workers are fully briefed on the changes which may potentially occur in their work environment as a consequence of the testing, before Workers re-attached personal isolation locks;
- implementing control measures and/or conditions for testing as delegated by the AIO;
- applying and removing work earths, as additional safety measures, and recording their application and removal in an appropriate log;
- on completion of work, the PIC shall ensure that all Workers working under the PTW:
 - have signed off the PTW;
 - have removed their personal isolation locks;
 - are informed the PTW is to be handed back; and
 - are located in a safe environment and have been instructed to keep clear of the equipment/work site.
- if the equipment is not in a safe and suitable condition to be operated, place an orange defect/restriction Lock and “Hazardous or Unusual Condition” tag on the group board prior to removing their own red personal isolation lock.

The PIC does not sign off the PTW unless transferring to another PIC or handing back the PTW to the AIO.

6.4.1 Transfer of PIC

Any new PIC shall be approved by the AIO. Where the current PIC is able to transfer PIC responsibilities to another PIC immediately;

- the current PIC shall advise the work party, and the AIO and PM, before any transfer of PIC is undertaken;
- the current PIC shall ensure the proposed PIC is authorised, informed of, and agrees to all the content and detail for the PTW section and then signs off the PTW;
- the incoming PIC then signs on to the PTW and agrees to the content of the PTW and immediately assumes responsibility, or follows the process of a suspended permit.

Where the current PIC is not able to transfer PIC responsibilities to another PIC immediately, the current PIC shall suspend the permit and apply defect/restriction lock to the group isolation board and place a “Hazard or Unusual Condition Tag” stating “delayed PIC transfer” and transfer the key to the Site Supervisor.

On hand back or suspension of the PTW, the current PIC shall,

- ensure all work party have signed off the PTW, removed any personal isolation locks and are clear of the work site and shall not re-enter it;
- where the work site is delineated:
 - close the PTW Area site entry;
 - remove “PTW Area” sign for work site entrance; and
 - apply sign to work site entry “No PIC on Site – Strictly No Entry”
- sign off the PTW “PIC - Change Log & Acknowledgement Sheet”;
- where there is a group isolation used:
 - the PIC is to remove their personal isolation lock and place the reasons for removal on the Hazard or Unusual Condition Tag; and
 - transfer the key from the defect/restriction lock via the Site Supervisor or their delegate to the new PIC as appointed.
- The PIC appointed to take on this delayed role shall:
 - sign on to the PTW and agrees to the content and conditions of the PTW and immediately assumes responsibility.
 - where there is a group isolation used attend the work site and receive the key to the defect/restriction lock attaching the PTW to the group isolation board;
 - confirm all aspects of the worksite have not deviated from that outlined in the PTW and its associated documents and inspect all isolation points, all with the AIO for the PTW, and seek clarification from the previous PIC as required;
 - ensure that all site signage is reinstated.

Where an unplanned transfer of the PIC responsibilities to another PIC is required, the permit will be suspended and transferred as described above.

6.5 Worker

The role of the worker is as follows:

- reviewing the JHA and specific job procedures and the scope, work site boundaries and risk managements controls identified;
- verifying green AIO lock is attached to group isolation board;
- signing on to the work party status sign on/off sheet and attaching red personal isolation lock to group isolation board, if and only if, they are satisfied that the work site is safe, and they have understood the documentation attached to the PTW;
- completing work in accordance with the JHA, specific job procedures and PIC instruction;
- communicating with the PIC and work party throughout the work activity;
- maintaining the specific work party tracking requirements during the work activity;
- working safely, both in regards to themselves and their co-workers; and

- signing off the work party status sign on/off sheet and removing red personal isolation lock from the group isolation board before leaving site or on completion of the work.

6.6 Visitors to Worksite Controlled by a PTW

Visitors shall only be given access to visit work sites controlled by a PTW after they have been given approval by the PIC and received an informal work site induction. Visits should be for legitimate and important reasons. They shall remain under the direct and continuous supervision of the PIC and shall not be left unaccompanied or unattended. The PIC shall ensure that the visit does not compromise the PTW conditions or risk controls.

7.0 Supporting Systems and Processes

The systems and processes that are required to support the PTW system and its procedure are:

- a) a competency based training and personal development system to ensure that all employees, and specifically those in key roles in the PTW process, are competent, confident, and authorised to carry out their responsibilities.
- b) an accessible register is maintained of all persons authorised in the WNR PTW System detailing their area of competence in exactly what operations, areas, assets they are competent in. This shall include refresher tracking to ensure competencies are maintained at the required level.

8.0 Permit to Work Numbering

8.1 Overview

Each PTW is to have a unique identification number, created as follows:

(wind farm or location)/asset/date/time (24 hour format) SSSS AAAAA DD MM YY HHMM

Examples are as follows;

Musselroe Wind Farm wind turbine B06 15th May 2018 10:13am would create – MRWTGB06 150518 1013

Studland Bay Trans Line 24th November 2020 3:31pm would create – SBTL 241120 1531

All attached project and HSE risk management documents e.g. JHAs, special permits, SOPO and work instructions, will use the above created PTW number followed by a forward slash and a capital alphabetic character.

An example is as follows;

PTW – MRWTGB06 150518 1013

SOPO for isolation – MRWTGB06 150518 1013 / A

Confined Space Permit – MRWTGB06 150518 1013 / B

Hot Work Permit – MRWTGB06 150518 1013 / C

8.2 Master & Subsidiary PTW Numbering

Any subsidiary PTWs required as part of a major scope of work where there are a number of work groups undertaking different tasks with different risk control measures would be numbered as the overarching (master) PTW number followed by a sequential capital alphabetic character. All attached special permits/checklists will use the above created subsidiary PTW number followed by a forward slash and a sequential capital alphabetic character. The Master Permit may also have higher level risk controls attached at the master permit level – eg. Project Safety Management Plan.

An example is as follows;

Master PTW – MRWTGB06 150518 1013

1st Subsidiary PTW – MRWTGB06 150518 1013 A

SOPO for isolation – MR WTGB06 150518 1013 A / A

2nd Subsidiary PTW – MR WTGB06 150518 1013 B

SOPO for isolation – MR WTGB06 150518 1013 B / A

9.0 Definitions

None

10.0 Accountabilities

The General Manager of WNR is to ensure that the PTW procedure and accompanying documentation are applied to activities undertaken and managed by the WNR business. Also, to ensure that personnel within the business have the delegate authority to implement the Procedure and are aware of their HSE risk management responsibilities, As Far As Reasonably Practicable (AFARP).

All staff within WNR conducting operational activities must ensure AFARP that they understand the requirements of this procedure and that their activities are in compliance with this procedure.

All staff and contract managers are to ensure the operational personnel they are responsible for have access to this procedure, understand the core requirements of this procedure and that they are provided with adequate supervision to minimise the risks of incidents in hazardous environments AFARP.

The HSE Manager for WNR is to ensure AFARP that this procedure reflects industry best practice, meets National and State legislative requirements and Standards and that this document is maintained within the Plan-Do-Check-Act cycles of the businesses HSE system.

11.0 References

- WNH Q14 Risk management procedure
- WNH Q25.1 Permit to work template
- WNH Q30 Isolation procedure