

Permit to Work Procedure

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1 Purpose

The Permit to Work (PTW) Procedure establishes a structured and controlled approach for managing high-risk work activities across all PBPL-operated or maintained sites. Its purpose is to ensure that such tasks are carried out safely, with clear accountability and robust risk management practices in place. While a permit is a critical component of this system, it does not, by itself, make the job safe. Safety depends on thorough hazard identification, comprehensive risk assessment, and effective communication of control measures to everyone involved.

2 Scope

This Permit to Work (PTW) procedure applies only to PBPL-controlled work activities involving specified high-risk tasks and excludes external parties or vessels where PBPL is not the Person Conducting a Business or Undertaking (PCBU).

For example, this procedure does not apply to external parties seeking access to PBPL infrastructure for construction, maintenance, or other physical works where:

- The applicant is the Person Conducting a Business or Undertaking (PCBU) with control of the work.
- PBPL is not the PCBU or contracting party for the works.

For third-party access where PBPL is not the PCBU, refer to the **PBPL Infrastructure Access Consent Procedure** for further information.

Additionally, The PBPL PTW system does not apply to ships and other vessels visiting the Port of Brisbane that wish to perform hot works or overside maintenance work.

3 Definitions

Term	Definition
Assurance Activities	Planned actions used to confirm that permit conditions and critical risk controls are in place, understood and effective before work starts and while it is underway. Assurance activities may include documentation review, targeted questioning, site inspections, verification of control implementation, monitoring of work conditions and follow-up on any gaps or non-conformances.
Conflicting high-risk activities	Conflicting high-risk activities occur when two or more high-risk tasks are planned to be carried out at the same time and within the same work area, such that one activity could increase the risk level or impact the safety controls of another.
Conflicting work activities	Any work activities, whether high-risk or not, that occur at the same time or in the same work area and may interfere with one another, create additional hazards, or reduce the effectiveness of planned controls. Conflicting high-risk activities are a specific subset of conflicting work activities.
Control Form	A color-coded form accompanying the PTW that details safety checks and control measures for high-risk activities.
Deviation Form	A form used to request, document, assess and approve a temporary departure from a specific requirement of the PTW procedure, including any alternative risk controls.
High-Risk Activity	PBPL identifies the following as high-risk activities: confined space entry, hot work, electrical work, excavation, working at heights, and plant isolation.
Onsite Supervisor	The individual responsible for instructing the work party, verifying worker competency where required, ensuring controls are implemented and monitored onsite, and completing permit withdrawal and closeout request steps after work completion. This person must remain onsite for the duration of the high-risk activity.
PBPL	Port of Brisbane Pty Ltd – the organization responsible for implementing and maintaining the PTW system across its operated or maintained sites.
PBPL Engager	The PBPL representative is responsible for the early review of PTW documentation, confirming scope and site alignment, coordinating stakeholder communication, completing assurance activities as assigned, and verifying safe work completion before final permit closeout. Note: When high-risk activities are conducted by PBPL employees, the onsite supervisor (as defined above) takes on the responsibilities of the PBPL Engager and must complete sections 3, 5, & 9 of the PTW form.
PCBU	Person Conducting a Business or Undertaking – the entity with control over the work activity. PBPL acts as PCBU for its controlled work activities.

Term	Definition
Permit Issuer	The authorised PBPL person responsible for the final governance review, checking the PTW register for conflicting high-risk activities, identifying required assurance activities, issuing or approving permits, and closing permits in the register.
Permit Requester	The person who identifies the high-risk activity along with the PBPL Engager, completes Sections 1 & 2 of the PTW Form, and submits documentation for review.
Permit to Work (PTW)	A formal written authorization system that ensures high-risk work activities are carried out safely through hazard identification, risk assessment, and communication of control measures. It does not make the job safe by itself; safety depends on compliance with controls.
PTW Register	A tracking system for all issued permits, maintained electronically in CREWS or onboard TSHD Brisbane.
SIMOPS plan	A SIMOPS (Simultaneous Operations) Plan is a formalised plan used to manage the risks created when multiple work activities occur at the same time in the same area. It ensures that work activities that are individually safe do not become unsafe when performed together.
SWMS	Safe Work Method Statement – a document outlining the specific hazards and control measures for the work activity.
Transfer Form	Records the handover of PTW responsibilities when the Onsite Supervisor, Engager, or Permit Issuer changes (e.g., shift change or unplanned leave). The form must be completed and signed by both parties before the handover.
Verification	The deliberate and recorded process of confirming permit requirements and critical risk controls are correctly implemented and effective before work starts and throughout the job. Verification includes checking documentation (PTW, SWMS, risk assessments and relevant Control Forms) and physically confirming on site that controls (for example isolations, barriers, PPE, monitoring and rescue readiness) match the approved permit conditions. Verification supports assurance by providing evidence that the PTW remains a live safety control and that work proceeds only when conditions are met, with clear communication between the Permit Issuer, PBPL Engager and Onsite Supervisor.

4 Roles and Responsibilities

Role	Key Responsibilities in PTW Process
Permit Requester	<ul style="list-style-type: none"> • Identify high-risk work activity in conjunction with the PBPL Engager • Complete Sections 1 & 2 of PTW Form. • Complete relevant Control Form(s) and site-specific Risk Assessment/SWMS. • Present documentation to PBPL Engager.
Onsite Supervisor	<ul style="list-style-type: none"> • Complete Section 6 of the PTW Form before any work commences . • Instruct the work party on methods and controls per the SWMS, PTW and relevant Control Forms. • Ensure worker sign-on and sign-off is completed for the work party in the PTW form. • Verify worker competency where required by the PTW or relevant Control Forms and confirm only competent workers undertake the task. • Implement permit requirements onsite and ensure risk management and health and safety of all people in the work area. • Monitor safety and control implementation onsite for the duration of the work. • Complete any permit-required assurance activities assigned to the Onsite Supervisor. • Manage and report hazards, incidents, or scope changes to the PBPL Engager and consult the Permit Issuer, where required. • Ensure the site is left in a safe state, complete Section 9 to withdraw the permit after work completion and submit the closeout request with relevant documentation.

Role	Key Responsibilities in PTW Process
PBPL Engager	<ul style="list-style-type: none"> • Complete Section 3 of the PTW Form before sending the Permit application through to the Permit Issuer • Lead the early review of PTW Forms, Control Forms, SWMS and supporting documentation for completeness, appropriateness and site alignment. • Define and clarify the work scope, location, timing and interfaces, including occupation rights and known infrastructure hazards. • Check for conflicting work activities, ensure stakeholders are informed of the work scope and oversight arrangements, and develop or coordinate a SIMOPs plan, where applicable. • Request amendments, challenge inadequate controls and consult with the Permit Issuer early for complex permits, where required. • Complete Assurance Activities identified by the Permit Issuer in Section 5 of the PTW Form. • Monitor contractor compliance with PBPL requirements and maintain communication with the Onsite Supervisor during the work. • Verify completion of work and permit requirements, ensure the site has been left in a safe state, reinstate the area for other works where applicable, and sign Section 10 (Close-Out) of the PTW Form. • Report non-conformances, hazards and incidents in Evotix and notify the Permit Issuer as soon as reasonably practicable of any moderate or more significant incidents or hazards.
Permit Issuer	<ul style="list-style-type: none"> • Conduct the final governance review of PTW documentation for completeness, compliance and appropriateness. • Request amendments, provide feedback to the PBPL Engager and challenge inadequate controls where required. • Check the PTW Register for conflicting high-risk work activities and determine whether additional controls or a SIMOPs plan are required. • Issue the permit, allocate the PTW number, update the register, and sign Section 4 (Approval) of the PTW Form. • Identify Assurance Activities under Section 5 of the PTW Form. Assurance Activities to be completed by the PBPL Engager. • Review permit extensions, deviations and significant changes or incidents in line with the PTW procedure. • Close the permit in the register, retain the PTW documentation and sign Section 11 (Close-Out).

Role	Key Responsibilities in PTW Process
Work Party	<ul style="list-style-type: none"> • At the start of each shift contact the Onsite Supervisor, obtain any Permit to Work and obtain permission to commence work. • Each day sign on/off in Section 7 of PTW Form. • Follow instructions and controls as per SWMS and Control Forms. • Report hazards or incidents to onsite supervisor.

5 Responsibility Matrix (RACI)

The Responsibility Assignment RACI Matrix defines the key roles and accountabilities within the Permit to Work (PTW) process at PBPL. It ensures that all parties understand their specific responsibilities for safe and compliant work execution.

The matrix clarifies who is **Responsible (R)**, **Accountable (A)**, **Consulted (C)**, and **Informed (I)** for each activity within the PTW process, promoting clear communication, efficient workflow, and alignment with PBPL's safety management standards. Where wording elsewhere in this procedure describes roles in broader terms, the RACI matrix is the primary source for role accountability and decision ownership.

This structure supports consistency, prevents overlapping or confusion of duties, and strengthens overall permit governance and compliance.

Task / Stage	PTW Requester	Onsite Supervisor	PBPL Engager	Permit Issuer	Comments
Identify the need for a permit	R	R	A/R		
Define and document scope of work	R	R	A/R		
Conduct risk assessment and prepare controls	R	A/R	C		
Engager review of all PTW supporting documentation (SWMS, drawings, control forms, etc.)			A/R	C*	Permit Issuers may be consulted early, especially for complex permits.
Verify occupation rights and communicate known infrastructure hazards	I	C	A/R		
Check for conflicting work activities (general site/task interface review)	I	R	A/R	I	
Permit Issuer review relevant PTW supporting documentation (SWMS, drawings, control forms, etc.)			C*	A/R	PBPL Engagers may be consulted, especially for complex permits.

Check for conflicting high-risk work activities (formal permit/register review)	I	C	R	A/R	
Identification of assurance activities	I	I/C*	R	A/R	<p>Permit Issuer is accountable for assurance activities.</p> <p>PBPL Engager should flag any additional activities to include.</p> <p>Onsite Supervisor is informed via the system and consulted when needed to coordinate onsite.</p>
Issue/approve Permit	I	I	I	A/R	
All stakeholders informed of work scope and oversight		R	A/R		
Where applicable, SIMOPs plan to be developed, shared with all relevant stakeholders, and saved with PTW documentation		R	A/R	I*	For complex or unfamiliar tasks, the Permit Issuer may ask to be informed of the SIMOPs plan.
Verify worker competency		A/R	R*		For some high-risk activities, competency must be verified in the control forms. Where required, the PBPL Engager checks the relevant training is complete.
Manage worker sign-on and sign-off		A/R	R		PBPL Engager checks that workers sign on and sign off during work.
Implement permit requirements on site		A/R	R		PBPL Engager checks that permit requirements are followed on site.
Monitor controls on site		A/R	R		PBPL Engager checks that the Onsite Supervisor is monitoring controls. PBPL Engagers may also complete site monitoring where relevant.
Complete permit-required assurance activities		C/R*	A/R		In some cases, the Permit Issuer may prescribe assurance activities for the onsite supervisor to take responsibility for.

Report incidents or scope changes		A/R	R	I/C*	Permit Issuer consultation is not always required e.g. minor incidents or low-risk hazards. For high-risk incidents (including near misses) consult the Permit Issuer to support decisions.
Site left in a safe state & permit closeout request submitted along with all relevant documentation		A/R	I/C*		PBPL Engager may be consulted before leaving site to confirm it is left safe.
Verify completion of work and permit requirements, ensure the site has been left in a safe state, and reinstate site for other works to continue in the area	I	I	A/R	C*	Permit Issuer may need to be consulted before final documents are submitted.
Close Permit	I	I	I	A/R	
* Not always a requirement					

Table Legend:

- R = Responsible (does the task)
- A = Accountable (owns the outcome / decision)
- C = Consulted (may provide input)
- I = Informed (kept updated on progress)

Overview of Review Stages in the Permit to Work Process

The Permit to Work (PTW) system includes two distinct but connected review stages to ensure high-risk work is both well prepared and formally controlled. The PBPL Engager’s review provides early assurance that the scope of work, hazards, and proposed controls are practical, site-aligned, and appropriately documented.

The Permit Issuer’s review is the formal governance step where documentation is assessed for compliance, high-risk work activity conflicts are checked, conditions are set, and approval is granted for work to proceed.

The table below summarizes the key differences between these two reviews, highlighting their purpose, authority, and role within PBPL’s PTW System.

Aspect	PBPL Engager Review	Permit Issuer Review
Purpose	Assurance & readiness	Formal approval
Authority to issue PTW	✗ No	✓ Yes
Focus	Practicality, site alignment, quality of controls	Compliance, conflicts, governance
Documents reviewed	PTW, SWMS, Control Forms	Same, plus register & conflicts
Key action	Challenge, clarify, coordinate	Approve, issue, enforce
PTW sections signed	Section 3 & 10	Issue section & Section 11
Role in safety system	Key assurance point	Final authorising authority

6 High Risk Activities

High-risk activities are tasks that, without appropriate controls, may result in serious injury or significant operational consequences. These activities require defined control measures and formal approval to ensure risks are managed to an acceptable level.

At PBPL the following activities are classified as **high-risk under PBPL procedures and therefore require a Permit to Work (PTW) before commencement:**

1. Confined Space Entry
2. Hot Work (e.g., welding, grinding)
3. Electrical (Live)
4. Electrical (High Voltage)
5. Excavation and Digging
6. Working at Heights
7. Isolation

Each PBPL high-risk activity has its own procedure with key requirements. Select the relevant activity above to view its procedure.

The colour coded '*Control Forms*' that accompany the PTW Form, set out what safety checks / control measures are to be used to ensure that the high-risk activity can be performed safely.

The table below details the key hazards associated with each high-risk activity, the required control measures, and the specific PTW requirements to ensure safe execution.

6.1 Table of PBPL High Risk Activities

Activity	Key Hazards	Potential Control Measures / Requirements	PTW Requirements
Confined Space Entry (e.g., sewer manholes, tanks)	Oxygen deficiency, toxic atmospheres, flammable gases, restricted exit, mechanical hazards	Ventilation, atmospheric testing, trained personnel, PPE, rescue plan	PTW authorises entry, confirms all controls, specifies personnel and monitoring requirements
Hot Work (e.g., welding, grinding)	Fire, explosion, burns, fumes	Remove flammable materials, fire suppression equipment, PPE, supervision, work area isolation	PTW confirms hazard controls, authorises competent personnel, documents fire prevention measures
Electrical (Live Work): Energised or near live lines	Electric shock, burns, electrocution	Insulated tools, PPE, lockout/tagout if possible, trained personnel, compliance with AS/NZS 4836	PTW confirms live work authorisation, ensures continuous monitoring, specifies control measures and responsible personnel
Electrical (High Voltage): Energised or near live lines	Fatal shock, arc flash, fire, uncontrolled energisation	De-energisation where possible, lockout/tagout, PPE, barriers, verification, trained personnel	PTW confirms HV authorisation, documents isolation and verification, assigns competent personnel
Excavation and Digging: Excavation > 1.5 m deep – e.g., trenches for pipe-laying	Cave-ins, underground service strikes, falls	Soil stability assessment, shoring, benching/battering, service location, competent operators	PTW confirms risk assessment, isolation of underground services, control measures, and supervision requirements
Working at Heights: Fall risk > 2 m – e.g., roof work, elevated platforms	Falls, dropped objects, structural collapse	Fall protection systems, guardrails, harnesses, safety nets, training, rescue plan	PTW authorises work at height, confirm controls, PPE, rescue readiness, and competent personnel
Isolation: Multiple energy sources or complex isolation steps	Unexpected energisation, stored energy, mechanical movement	Lockout/tagout, verification, controlled de-energisation, signage, competent personnel	PTW documents isolation points, assigns responsibility, verifies controls before work starts, prevents re-energisation

6.2 Activities frequently Misclassified as High Risk

Some tasks may **appear high risk** but do not meet the threshold for high risk when proper controls are in place. Examples:

- 1 **Using a ladder for short, low-level tasks** (under 2 meters) with stable footing and supervision.
- 2 **Basic hand tools used** in a controlled environment.
- 3 **Routine cleaning or maintenance** without exposure to hazardous substances or energy sources.

These tasks still require safe work practices but **do not need a Permit to Work** under PBPL procedures.

7 When is a Permit to Work Required?

A permit is required for all PBPL controlled work activities that involve one or more specified high-risk activities covered by the PTW System. **Appendix A** illustrates when a PTW is required.

PBPL controlled work includes, but is not limited to the following work scenarios:

- work undertaken by PBPL workers
- work undertaken by supplier/contractors or consultants as part of a service/maintenance arrangement
- work undertaken by supplier/contractors or consultants on a purchase order/one-off arrangement.

Where PBPL is the Person Conducting a Business or Undertaking (PCBU), all contractors must complete a PBPL Permit to Work using PBPL documentation, regardless of their own internal processes or systems. This ensures that PBPL maintains control and oversight of high-risk activities, aligns all work under a single safe system of work, and eliminates potential gaps caused by differing contractor procedures.

High-Risk work activities conducted in Principal Contractors areas of control must be managed under the Principal Contractors Permit to Work System.

8 Permit to Work Process

Permit to Work (PTW) Process by Section of the PTW form and Responsibility

Step	Section in PTW Form	Person Responsible
1. High-risk task requiring PTW is identified and the need for a permit is confirmed	Section 1	Permit Requester and Onsite Supervisor, led by the PBPL Engager.
2. Complete required forms (PTW Form, Control Form(s), SWMS)	Sections 1 & 2	Permit Requester
3. Submit forms to the PBPL person engaging the contractor or PBPL worker*	Sections 1 & 2	Permit Requester
4. PBPL Engager review: review documentation, confirm scope, occupation rights, known infrastructure hazards, and general conflicting work activities and interfaces; ensure stakeholders are informed and, if satisfied, present to the PBPL Permit to Work Issuer	Section 3	PBPL Engager
5. Issuing the permit	Section 4	Permit Issuer
6. Assurance Activities	Section 5	Identified by the Permit Issuer and completed and signed by the PBPL Engager, and in some circumstances by the Onsite Supervisor where specified in the permit.
7. Onsite Supervisor responsibilities clearly documented. Must be signed and sent to the PBPL Engager before work commences.	Section 6	Onsite Supervisor
8. Sign on/off of work party	Sections 7	Onsite Supervisor
9. Approval of Permit Extension – if required	Section 8	Permit Issuer
10. Ensure the site is left in a safe state, complete permit withdrawal, and submit the closeout request with all relevant documentation	Section 9	Onsite Supervisor
11. Verify completion of work and permit requirements, confirm the site is left safe, reinstate the area where applicable, and return permit documentation.	Section 10	PBPL Engager
12. Close permit in register	Section 11	Permit Issuer

***Note:** If the work is completed by a contractor, all completed forms are presented to the PBPL person who has engaged the supplier/contractor (PBPL Engager). If the work is completed by PBPL employees, then the onsite supervisor must fulfil the role of the PBPL Engager, i.e.:

- review the content of the site/work activity specific risk assessment/Safe Work Method Statement (SWMS), control form/s and PTW form, and when satisfied, hand the documentation to the PBPL Permit to Work Issuer.
- Complete Section 3, 5 & 10 of the PTW form.
- Review and manage control effectiveness onsite

8.1 Transfer form

The Transfer Form is used to record a handover of PTW responsibilities when the Onsite Supervisor, Engager, or Permit Issuer changes (e.g., shift change, extension, or unplanned leave). Both parties must complete and sign the form before the handover and summarize the reason for the change and any critical handover details in the “Specific Instructions” section.

If the **Onsite Supervisor** cannot continue and cannot complete the transfer, the PBPL PTW Engager must:

- confirm PTW progress and any safety issues
- consult the Permit Issuer where required
- brief the work party and incoming Onsite Supervisor
- complete the Transfer and Specific Instructions sections on the Supervisor’s behalf
- The incoming Onsite Supervisor must sign the Transfer Form before any further work commences.

If the Engager cannot continue and cannot complete the transfer, the PBPL PTW Permit Issuer must decide whether to terminate the permit or themselves:

- confirm PTW progress and any safety issues
- brief the Onsite Supervisor and incoming Engager
- complete the Transfer and Specific Instructions sections on the Engager’s behalf
- The incoming PBPL Engager must sign the Transfer Form before any further work commences.

8.2 Extension

A Permit to Work may only be extended where the original scope of work remains unchanged, the work area and conditions have been reassessed, and all identified controls remain effective and suitable for the continued work. A permit extension is intended to allow the completion of the same approved work where additional time is required, and must not be used to approve new tasks, changed conditions, or an expanded scope of work.

A permit extension may only be approved **once** and for a period of no more than **7 days from the original permit close-out date**.

The extension must only be completed by the **original PBPL Permit Issuer, or the incoming Permit Issuer provided a Transfer Form has been completed**. Before approving the extension, that person must confirm that:

- the original work scope has not changed.
- the Risk Assessment, SWMS / control forms and any supporting permit documents remain current and applicable.
- the work area has been reviewed, and conditions remain safe for the work to continue.
- any new or changed hazards have been assessed and appropriately controlled.

- interactions with other work activities, permits or site operations have been reviewed through the Permit to Work Register.
- the work party, onsite supervisor and relevant affected persons have been consulted where required; and
- the permit register has been updated to reflect the approved extension period.

If the scope of work has changed, site conditions have materially changed, or controls are no longer adequate, the permit must **not** be extended. In these cases, the existing permit must be closed out and a **new Permit to Work** raised and authorised.

The permit issuer approving the extension must record the revised permit period, sign, and date the extension before work continues beyond the original expiry.

8.3 Permit Deviation

A deviation form may be used in relation to the Permit to Work (PTW) process where there is a genuine need to depart from a specific procedural requirement. For example, this may include circumstances where an extension to a permit is required beyond the standard maximum period of one week. In such cases, the deviation form must be completed by the requester, onsite supervisor, or engager, with sufficient detail provided to explain the nature of the deviation, the reason it is required, the duration of the deviation, and any alternative control measures that will be implemented to manage risk.

All PTW deviations must be formally reviewed and approved by the appropriate Permit Issuer prior to implementation. Depending on the nature of the deviation, this may also include the relevant Business Unit Executive General Manager, the Executive General Manager Governance, and the Head of Health, Safety and Wellbeing. Deviations are intended to be exceptional and temporary arrangements only and must not become standard practice or a substitute for compliance with the PTW procedure.

8.4 Permit to Work Registers

The PBPL PTW register is used to track the status of all issued permits and allocate PTW numbers. Two separate PTW registers will be maintained as follows:

- Electronically in CREWS for all PBPL work sites except for the TSHD Brisbane
- Electronic copy onboard the TSHD Brisbane

The role of the PTW Register is to provide a number allocation and tracking system for permits.

PBPL Permit to Work Issuers are responsible for ensuring that the appropriate PTW Register is kept up-to-date at all times in terms of the status of all permits.

8.5 SIMOPS Plan (Simultaneous Operations)

A SIMOPS Plan is required where simultaneous or overlapping work activities may create additional risk, affect existing controls, or require coordinated oversight. The plan must clearly document how the work interfaces will be managed before the permit work commences. It should consider the following:

- What activities are occurring at the same time;
- where and when the activities overlap;
- how the activities may interact, conflict, or affect existing controls;
- additional controls required to safely manage the interface;
- communication and coordination requirements; and

- the person responsible for coordination, oversight, and ongoing monitoring.

The PBPL Engager is responsible for identifying potential conflicting work activities in the location where the permitted work is planned. This includes consulting with relevant site managers, maintenance teams, work owners and other affected stakeholders to confirm whether other activities are planned or underway in the same area.

Where conflicting work activities are identified, the PBPL Engager must coordinate the development of a SIMOPS Plan or confirm another suitable method of managing the interface. The SIMOPS Plan must be agreed with relevant stakeholders and retained with the PTW documentation.

The Permit Issuer must use the PTW Register to identify potential conflicting high-risk activities during the permit review process. Where a conflict is identified, the Permit Issuer may require a SIMOPS Plan, request additional controls, or decline the permit if the risk cannot be adequately controlled.

8.6 *Conflicting High-Risk Activities*

Conflicting high-risk activities are a specific subset of conflicting work activities and occur when two or more high-risk tasks are planned to be carried out at the same time and within the same work area, such that one activity could increase the risk level or impact the safety controls of another.

The Permit Issuer must use the PBPL Register to identify potential conflicting high-risk activities during the planning and permit review process.

Where conflicting high-risk activities are identified, the **Permit Issuer** is responsible for:

- Reviewing the associated risks
- Determining whether the work can proceed safely with additional controls (e.g., implementation of a SIMOPS plan), or
- Refusing the permit if the risks cannot be adequately controlled

8.7 *Assurance Activities*

Assurance activities are planned actions used to confirm that permit conditions and critical risk controls are in place, understood and effective before work starts and while it is underway. Assurance activities may include documentation review, targeted questioning, site inspections, verification of control implementation, monitoring of work conditions and follow-up on any gaps or non-conformances.

The following outlines how the **PBPL Engager** might conduct assurance activities.

i) Conduct Targeted Walk-Throughs Aligned to the PTW and Control Forms

The PBPL Engager might physically walk the work area to confirm that risk controls match what is documented in the PTW, SWMS, and relevant Control Forms. This includes confirming the work location, isolation boundaries, rescue readiness, or fall protection arrangements depending on the activity.

Examples of what to check:

- Work area barricading and signage are in place.
- Access and exclusion zones reflect the PTW requirements.
- Plant is isolated exactly as described in the Isolation Control Form.
- Hot work areas are prepared and combustibles removed as documented.

- Confined space barriers, monitors, and rescue equipment match documented requirements.
-

ii) Validate Critical Controls Through Prompting Questions

Prompts are a structured assurance mechanism and a key tool for verifying that controls are implemented and practical, not just listed on paper. The PBPL Engager uses activity-specific questions to uncover gaps and confirm readiness.

Examples:

- *“Show me how isolation was verified before starting.”*
- *“How does your fall restraint system prevent edge access?”*
- *“Where have underground services been marked?”*
- *“What is your communication method for confined space entry?”*

These questions help ensure that the documented controls are functioning as intended. The table below provides additional **prompting questions** for each type of high-risk activity.

Activity	Purpose / Risk	Prompts to Use	Assurance Focus
Isolation	Physically disconnect energy sources to make equipment safe	<ul style="list-style-type: none"> • What steps confirm isolation has been applied correctly? • How do you verify zero energy before starting work? • What is your process for restoring isolation after work completion? • Are all isolation points clearly tagged and communicated? 	Isolation Control Form and Steps Sheet complete and effective
Hot Work	Welding, grinding, cutting, or naked flames outside designated areas	<ul style="list-style-type: none"> • What controls prevent sparks from affecting other areas? • Has the area been gas tested and monitored? • What fire extinguishing equipment is available? • Who is responsible for post-hot work monitoring? 	Fire prevention measures documented in Hot Work Control Form
Working at Heights	Tasks with fall risk \geq 2m require fall prevention and rescue planning	<ul style="list-style-type: none"> • What steps secure loose items at height? • How does the fall restraint system prevent edge access? • Have harnesses/lanyards been inspected within 6 months? • What's your rescue plan? • How do you ensure 100% tie-off compliance? 	Work at Heights Control Form includes anchor certification and rescue readiness
Confined Space Entry	Atmospheric and access hazards	<ul style="list-style-type: none"> • Who is the nominated Confined Space Planner and their training? • What communication methods exist between safety watch and supervisors? • Has a rescue plan been practiced? • Are electrical appliances compliant with voltage and insulation? 	Isolation, atmospheric testing, and rescue plans documented and practical
Excavation and Digging	Excavation deeper than 300 mm or near underground services	<ul style="list-style-type: none"> • What underground services have been identified and marked? • How is public safety ensured? • Is excavation shored or benched per ACOP? • What environmental controls prevent contamination? 	Excavation Control Form includes service location, collapse prevention, and emergency planning
Electrical Safety (Live & HV)	Work on or near electrical installations requires isolation and competent personnel	<ul style="list-style-type: none"> • What recovery measures exist for electrical shock? • Is the safety observer positioned outside arcing fault limit? • Are insulated tools and PPE checked and fit? • What steps ensure safe working distances? 	Lockout/tagout and PPE requirements documented and enforced
Live Electrical Work & Testing (<415V)	Testing on energised equipment requires strict isolation verification and PPE	<ul style="list-style-type: none"> • Who is responsible for isolation and how is it verified? • Is isolation limited to localised equipment? • How do you ensure isolation is removed before leaving? • What method proves isolation is effective? 	Live Electrical Control Form reflects safe practices and isolation steps

iii) Confirm the Presence and Condition of Required Equipment

The PBPL Engager might check that mandatory equipment listed in the Control Forms is present, functional and appropriate for the task.

Examples include:

- Fire extinguishers and fire watch arrangements for hot work.
- Atmospheric monitors for confined space entry.
- Certified anchor points, inspected harnesses, and rescue kits for work at heights.
- Insulated tools, PPE and safety observer positioning for electrical work.

This ensures compliance with PBPL standards and Australian WHS legislation.

iv) Cross-Check SWMS, PTW and Actual Site Conditions

The PBPL Engager verifies that the SWMS and control measures reflect real site conditions and that the work party is following them. SWMS must be task-specific and aligned to the PTW — generic SWMS are not acceptable.

What to look for:

- Steps being followed match the SWMS sequence.
 - Controls (e.g., spotters, testing, fire watch, spotters near services) match both the SWMS and PTW.
 - Any changes in site conditions have been communicated and documented.
-

v) Engage Directly with the Work Party and Onsite Supervisor

Engagers must ensure that communication is active between themselves, the Onsite Supervisor, and workers. This includes ensuring that all workers understand the permit conditions and that controls are implemented as documented.

Effective engagement includes:

- Asking workers to explain the controls they are using.
 - Confirming they have read and signed on to the PTW (Section 7).
 - Checking that supervision is adequate for the identified risks.
-

vi) Verify Ongoing Compliance Throughout the Task

Assurance is not a one-off action. The PBPL Engager should monitor for emerging hazards and confirm controls remain effective throughout the activity.

Examples:

- Re-checking isolation during multi-stage tasks.
 - Monitoring environmental changes that affect confined space or hot work.
 - Confirming excavation controls (benching, shoring, service markings) remain in place.
-

vii) Summary

The PBPL Engager provides assurance of controls on-site by:

1. Conducting targeted physical inspections.
2. Using structured prompts to test the effectiveness of controls.
3. Confirming presence and readiness of required equipment.
4. Ensuring alignment between PTW, SWMS, and actual conditions.
5. Engaging directly with workers and supervisors.
6. Monitoring controls throughout the job.
7. Documenting verification through formal PTW sign-offs.

This approach ensures that hazards are managed in accordance with PBPL standards, WHS legislation, and the intent of the PTW system — maintaining the PTW as a live and effective safety control.

9 Training Requirements

9.1 Objective

To ensure all personnel involved in the Permit to Work (PTW) process have the necessary knowledge, skills, and competency to perform their roles safely and effectively. The training matrix provides a structured approach to identify mandatory training, refresher requirements, and pre-requisites for each role within the PTW system.

9.2 Key Requirements

- **Role-Specific Training:** Training requirements vary by role (Permit Requester, Onsite Supervisor, PBPL Engager, Permit Issuer) and must support the responsibilities assigned in the PTW RACI.
- **Verification of Competency (VOC):** Certain roles require formal VOC to confirm practical understanding and application of PTW processes, particularly for permit governance and decision-making.
- **Refresher Training:** PTW System Overview, PBPL Engager, and Permit Issuer modules every 3 years, with Permit Issuers supplemented by quarterly case study reviews.
- **Pre-Requisites:** Includes site induction, risk assessment capability, health and safety induction, and relevant high-risk certifications for specific roles. For both the Permit Issuer and PBPL Engager roles, a selection criteria table must be completed by the applicant and their manager and signed by the Head of HSW.
- **External Modules:** High-risk work training (for example confined space, working at heights and electrical) must be completed.

9.3 Training Matrix

Role	Mandatory Training	Refresher Interval	Prerequisites
Permit Requester	PTW Systems Overview Module	Every 3 years	Site Induction, Risk Assessment capability
Onsite Supervisor	PTW Systems Overview Module + Relevant External High-Risk Modules	Every 3 years	Site Induction, SWMS knowledge, worker supervision capability and relevant high-risk certifications where applicable
PBPL Engager	PBPL Engager Module + High Risk Activities Assessment	Every 3 years	Site Induction, risk assessment capability, contractor oversight capability and understanding of site hazards and occupation rights
Permit Issuer	Permit Issuer Module + Relevant VOC Assessments + Quarterly case study reviews + Relevant External High-Risk Modules	Every 3 years	Site Induction, advanced PTW knowledge, permit governance capability and competence in register, conflict and assurance decision-making

9.4 Verification of Competence (VOC) – Permit Issuers

Permit Issuer applicants must complete a VOC Assessment to be approved as a PBPL Permit Issuer.

The VOC is designed to:

- Capture the **assessment outcome** (VOC achieved vs further training required).
- Confirm the trainee’s **acknowledgement/commitment** to comply with PBPL PTW requirements.
- Provide a structured **knowledge assessment** (questions/scenarios) to confirm understanding of critical controls and decision-making.
- Define **records management** expectations (where the VOC and supporting records must be stored/published: iChris).

The PBPL Permit to Work VOC Assessment has two categories—**Baseline and Specific**—aligned to the high-risk activity breakdown above.

- The **Baseline** VOC Assessment covers **Hot Works, Working at Heights, Isolation, and Confined Space**.
- The **Specific** VOC comprises three separate VOC Assessments: **Excavation, Live Electrical, and High Voltage Electrical**.

9.5 Permit Issuer Quarterly Case Study Reviews

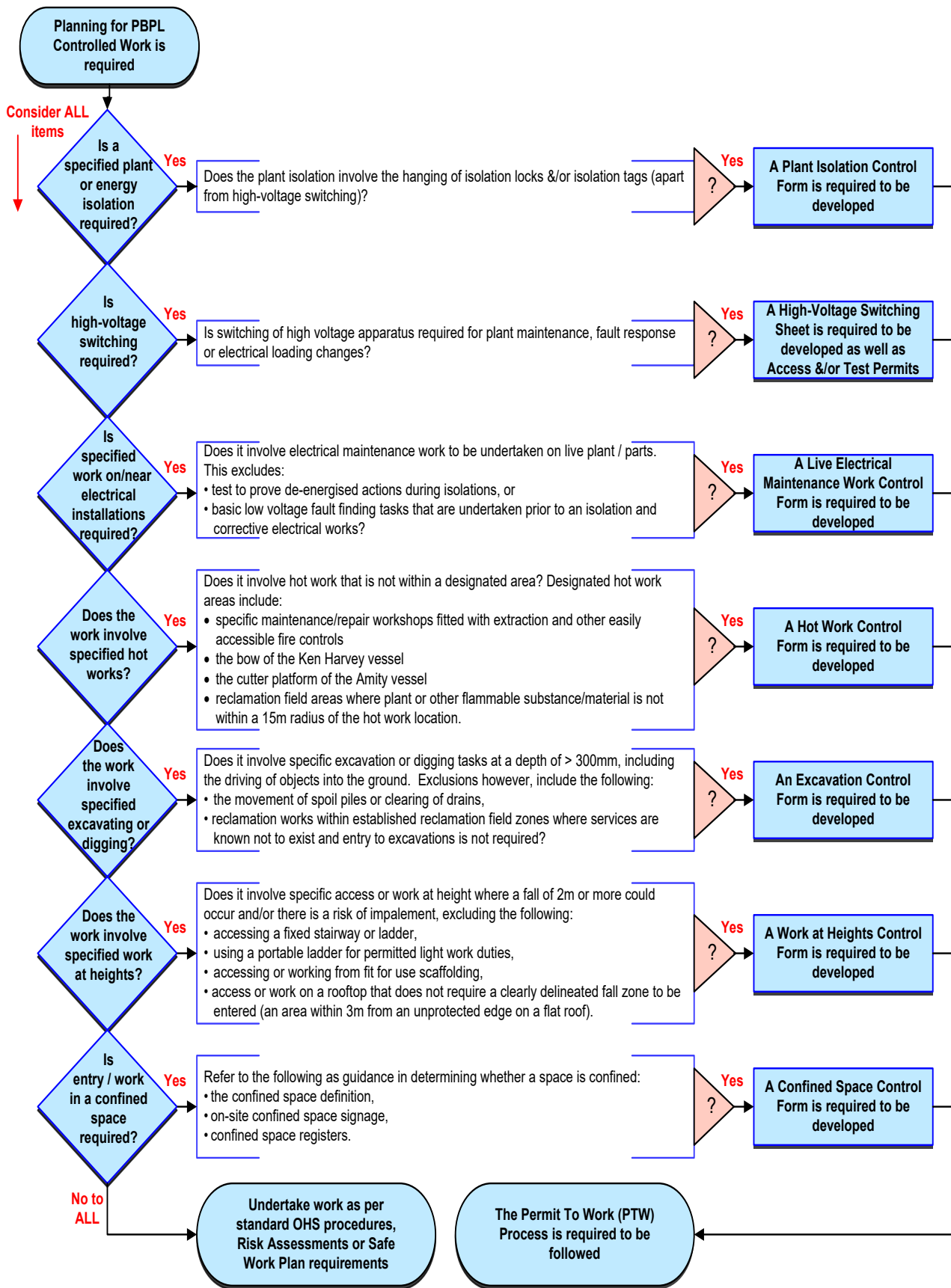
Quarterly case study review sessions will be conducted for all PBPL Permit Issuers to support consistent decision-making, strengthen permit governance, and drive continuous improvement in the Permit to Work (PTW) system. Sessions will focus on reviewing real examples (de-identified where required), including complex permits, investigations, and learnings, to reinforce expectations and share good practice across the issuer cohort.

- **Audience:** All PBPL Permit Issuers.
- **Frequency:** Quarterly (typically 1 hour).
- **Chair:** A Health & Safety representative.
- **Invitees:** PBPL Engagers may be invited on occasion where their input supports shared learning.
- **Topics:** Complex permits; permit conditions and control verification; interactions between simultaneous permits; incidents, near misses and investigations; non-compliance trends; and key learnings/updates.
- **Objective:** Identify learnings, improve permit quality and consistency, and agree actions to prevent recurrence of issues.
- **Outputs:** Agreed actions and/or procedural improvements recorded and communicated to Permit Issuers and relevant stakeholders.

10 Non-Compliance

Breaches of this procedure may result in disciplinary action being initiated in accordance with PBPL's Code of Conduct.

11 Appendix 1: Specified High Risk Work Task Summary



12 Appendix 2: Permit Issuer Selection Criteria Table and Formal Approval

Objective: Summarize the candidate's overall ability to fulfill the role.

Please tick the High-Risk work activities the candidate intends to Issue Permits for:

Baseline		Specific	
<input type="checkbox"/>	Hot Works	<input type="checkbox"/>	Excavation
	Working at Heights	<input type="checkbox"/>	Live Electrical
	Plant Isolation	<input type="checkbox"/>	High Voltage Electrical
	Confined Space		

Please provide examples of your experience with the following:

Category	Candidate Comments	Manager Comments	Head of HSW Comments
Technical knowledge and regulatory compliance regarding High-Risk Work Activities e.g. <ul style="list-style-type: none"> Relevant qualification Description of technical experience – undertaking / supervising HRW, include roles/ employment, years 			
Experience reviewing PTW documentation e.g. SWMS, Control Forms			
Experience with Onsite Assurance Activities			
Stakeholder Engagement & Communication			
Administrative Accuracy & Attention to Detail			
Conflict Resolution & Escalation Capability			

Pre-Approved by EGM Governance:	
Date:	

Please confirm that you have completed the training modules below:

<input type="checkbox"/>	Permit Issuer Training Module
<input type="checkbox"/>	Permit Issuer VOC assessment - Baseline
<input type="checkbox"/>	Permit Issuer VOC assessment – Specific (Excavation)
<input type="checkbox"/>	Permit Issuer VOC assessment – Specific (Electrical High Voltage)
<input type="checkbox"/>	Permit Issuer VOC assessment – Specific (Live Electrical)
<input type="checkbox"/>	Relevant High-Risk Activities External Modules
<input type="checkbox"/>	PBPL Risk Assessment Training
<input type="checkbox"/>	PBPL H&S Induction & Authority to Work Safely
<input type="checkbox"/>	Conflict Management

Approved by EGM Governance:	
Date:	

13 Appendix 3: PBPL Engager Selection Criteria

Objective: Summarize the candidate’s overall ability to fulfill the role.

Please provide examples of your experience with the following:

Category	Candidate Comments	Manager Comments	Head of HSW Comments
Experience and understanding of High-Risk Activities			
Experience reviewing PTW documentation e.g. SWMS, Control Forms			
Experience Completing On-Site Assurance Activities			
Stakeholder Engagement & Communication			
Administrative Accuracy & Attention to Detail			
Conflict Resolution & Escalation Capability			

Pre-Approved by EGM Governance:	
Date:	

Please confirm that you have completed the training modules below:

<input type="checkbox"/>	PBPL Engager Module
<input type="checkbox"/>	High Risk Activities Assessment
<input type="checkbox"/>	PBPL Risk Assessment Training
<input type="checkbox"/>	PBPL H&S Induction & Authority to Work Safely
<input type="checkbox"/>	Conflict Management

Approved by EGM Governance:	
Date:	