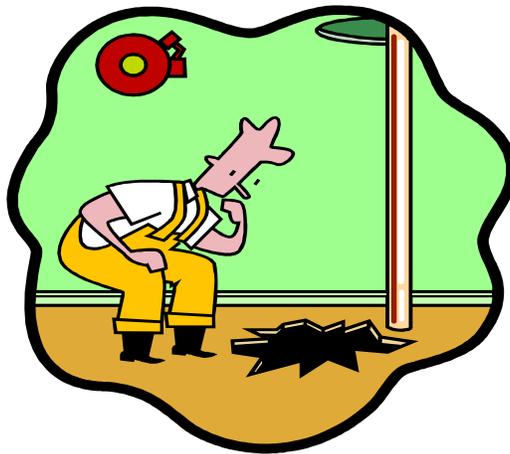


**Footwear and Leather Industries  
Health & Safety  
Committee**

# ***Should you be doing that?***

## **A guide to Permits to Work in the Footwear & Leather Industries**





## **INTRODUCTION**

**Under relevant existing statutory provisions, employers are required to provide systems of work that are, so far as is reasonably practicable, safe and without risks to health to their employees and to other who may be affected by the work.**

However, certain types of work carry a particularly high risk of serious personal injury, serious ill health or property loss and require more formal safety planning and control. This can be achieved by the use of and strict adherence to a "permit-to-work" system.

## **WHAT THE LAW SAYS**

Legal requirements relevant to permits-to-work are set out in the following legislation:

### **Health and Safety at Work etc Act 1974**

Section 2 General duties of employers to their employees

Section 3 General duties of employers and self-employed to people other than their employees

Section 7 General duties of employees at work

### **Management of Health and Safety at Work Regulations 1999**

**Regulation 3** Risk assessment to determine preventive and protective measures

**Regulation 4** Arrangements for effective planning, organisation control, monitoring and review of preventive and protective measures

**Regulation 8** Information for employees

**Regulation 9** Co-operation and co-ordination



**Regulation 10** People working in host employer's undertaking

**Regulation 11** Capabilities and training

### **WHAT IS A PERMIT TO WORK?**

A permit-to-work system is a formal recorded process used to control work which is identified as potentially hazardous. It is also a means of communication between site/installation management, plant supervisors and operators and those who carry out the hazardous work. Essential features of permit-to-work systems are:

- clear identification of who may authorise particular jobs (and any limits to their authority) and who is responsible for specifying the necessary precautions;
- training and instruction in the issue, use and closure of permits;
- monitoring and auditing to ensure that the system works as intended;
- clear identification of the types of work considered hazardous;
- clear and standardised identification of tasks, risk assessments, permitted tasks
- duration and supplemental or simultaneous activity and control measures.

The terms 'permit to work', 'permit' or 'work permit' refer to the paper or electronic certificate or form which is used as part of an overall system of work, and which has been devised by a company to meet its specific needs.

A permit to work system aims to ensure that proper consideration is given to the risks of a particular job or simultaneous activities at site. Whether it is manually or electronically generated, the permit is a detailed document which authorises certain people to carry out

specific work at a specific site at a certain time, and which sets out the main precautions needed to complete the job safely.

## WHERE A PERMIT TO WORK MIGHT BE USED

- demolition
- hot work (cutting, grinding, welding)
- cold work
- entry into confined spaces
- electrical work
- erection of steel and structural frames
- excavation work
- high risk equipment maintenance
- use of highly flammable substances
- work on pressure systems
- lifting operations
- use of suspended access equipment
- roof work
- asbestos
- hazardous or restricted areas

## DESIGNING A PERMIT TO WORK

See Appendix 1.

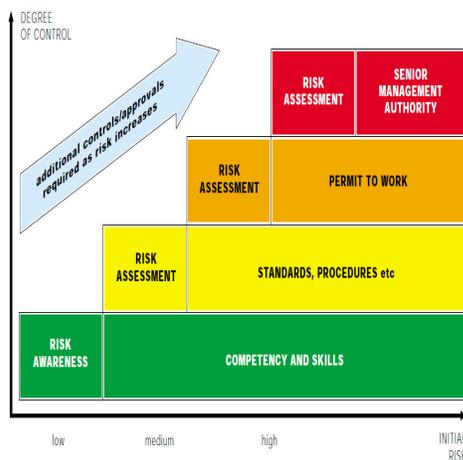
## ASSESSING THE TASK

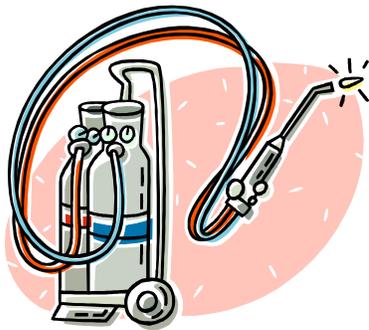
Assessing the task in hand will help to decide if a formal permit to work is required. This can be done using the information contained within the risk assessment and method statement supplied by the contractor.

## HOT WORK EXAMPLES:

- ⇐ Higher risk maintenance activities (eg hot work next to flammable store).
- ⇐ Hot work out with dedicated workshop (eg in factory).
- ⇐ Hot work within an engineering workshop.
- ⇐ Hot work takes place in an engineering workshop within bays dedicated to controlling risks such as fire and fume.

risk control model





## **ROLES AND RESPONSIBILITIES**

### **Three tiers:**

1. **Overall controller** (CEO/Chief Engineer/Plant Manager etc)
2. **Nominated person** to issue permit
3. **Permit recipients** – operators or contractors

### **Authorisation:**

Executive responsibility for arranging and authorising a task remains the province of the issuing company at all times. This can be dealt with through internal structures. There may be different levels of authorisation to ensure that the type of work required is authorised by the appropriate level of management

Persons authorised to issue and sign permit to work must:

- Be carefully selected (eg interview) and:
- Understand the responsibilities involved with the job
- Be familiar with the plant, potential hazards and isolation procedures
- Specify the level of precautions and any emergency/rescue arrangements required
- Be trained/instructed in all aspects of the permit to work system

### **Permit issue – key steps:**

1. Authorised person issues the permit to work to the person (or group) clearly indicating:
  - ✓ The plant, work to be done and safety measures
  - ✓ How long the permit to work remains in force
  - ✓ That no variation is allowed to the specific work

2. The authorised person must check that all the preparations, isolations and precautions specified in the permit to work have been taken.
3. The authorised person must certify that the particulars outlined in the permit to work are correct and that the work may proceed.

**Permit acceptance:**

A permit to work must only be issued to a person (or group) that is competent to carry out the work described in the permit to work. This can include trained competent employees and approved contractors.

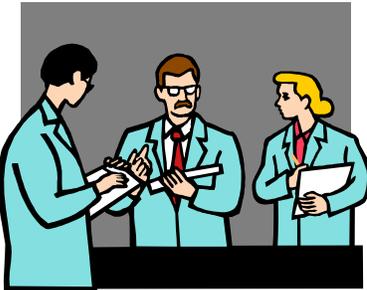
The person (or group) must be accredited to sign to accept the conditions of the permit to work prior to commencing - including:

- Understanding the hazards and precautions to be taken
- Signing the permit to work as acceptor
- Briefing a larger workforce under his/her control on the hazards, precautions to be taken and all other conditions laid down in the permit to work
- Carrying out the work as specified on the permit to work

A copy of the permit to work must be given to the acceptor. Original of permit to work must be given to authorised person (or posted on "live" permit board). The permit to work should always be available for inspection purposes.

**Completion of Work and Permit**

The acceptor(s) (competent person) should check the area to ensure that the work has been completed and all tools, equipment and



	<p>materials withdrawn and that the area is left in a safe condition and fit for use, at the end of each permit period.</p> <p>When the work is complete, at the end of a shift or in certain cases where there is a status change the acceptor signs the "completion" section of the permit to work and informs the authorised person</p> <p>The authorised person inspects that the work has been completed as specified in the permit to work and that the plant/equipment is safe for use.</p> <p>The authorised person then cancels the permit to work.</p> <p>At the start of each day or shift, a new copy of the permit will have to be issued with the time the work is carried out, so that all details are correct in each case</p>
	<p><b>WHAT CAN GO WRONG?</b></p> <ul style="list-style-type: none"><li>× Failure to recognise a significant hazard (either before or during maintenance)</li><li>× Inaction concerning known deficiencies in the permit to work system</li><li>× Communication failure during the use of a permit to work system</li><li>× Lack of enforcement of the permit to work system</li><li>× Inadequate auditing of the permit to work system</li><li>× Failure of the site safety management system</li><li>× Cost shortcuts by contractors</li></ul>



If unforeseen hazards arise during the validity period, the permit to work becomes void. Work should cease, the work area made safe and a new permit to work incorporating the necessary changes issued. The authorised person should cancel the old permit and mark it "VOID".

### **Completion of Work**

On completion of the work stipulated in the permit, the person(s) who conducted the work should ensure that all the precautionary measures taken during the course of the work are removed, or terminated safely. Under those circumstances, the permit to work should be signed and returned to the authorised person.

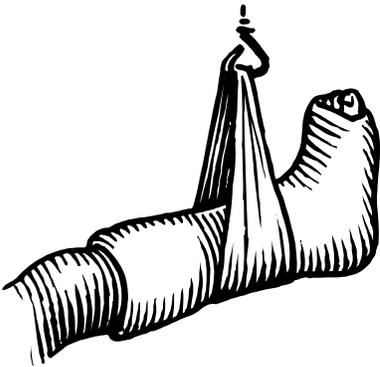
### **Reinstatement of Work Area**

It is the responsibility of the authorised person to ensure that plant, equipment and the work area are returned to service in an orderly fashion. It is also the responsibility of that person to ensure that all users are informed that normal operations/processes may resume.

At that stage, the permit to work should be signed off by the authorised person. Completed permits and any corresponding "VOID" permits should be retained by the issuing company for inspection purposes. Copies should be made available to safety representatives, estates offices and relevant contractors on request.

### **AUDIT**

It is essential that the effectiveness of the permit to work system is routinely checked by a competent person.



Inspections/audits should check that:

- ❖ The plant worked on was clearly defined
- ❖ The work done was clearly defined including isolations, preparations and precautions (eg isolation, draining, cleaning, purging, testing, barrier erection, warning posted, etc)
- ❖ Any residual hazard was described on the permit
- ❖ **Additional safety measures** required were listed on the permit (eg PPE, personal alarm, etc). Also, emergency arrangements were highlighted where appropriate
- ❖ The start and finish times were clearly stated on the permit. It is recommended that the duration of a permit should not exceed 24 hours unless the issuer is satisfied that the plant/job conditions and safety measures will not change
- ❖ Any suspension of work or change of status to the permit (eg where the issuer or acceptor(s) change during the course of the work) must be reflected in the completion of work section or clearly referenced to another document
- ❖ The issuer of the permit is authorised by the company
- ❖ The permit has not been issued and accepted by the same person
- ❖ The acceptor of the permit has signed the permit stating that the conditions of the permit (ie hazards and precautions) were understood
- ❖ The acceptor has signed the **completion of work** section to indicate that the work was complete
- ❖ The issuer has signed the **cancellation** section confirming that the work was completed satisfactorily in time and the plant/equipment was returned to

service

- ❖ Determine that permits to work are used where required
- ❖ Ensure requirements of the permits are met 100% of the time.
- ❖ A high standard of permit to work must be maintained, so that acceptors will look upon them as confirmation that their safety has been carefully considered. If the standard of permit to work is not as high as can be achieved they will be of little use.

It is good practice for the permit file to be reviewed periodically to identify routine work where a written safe system of work would be more appropriate.

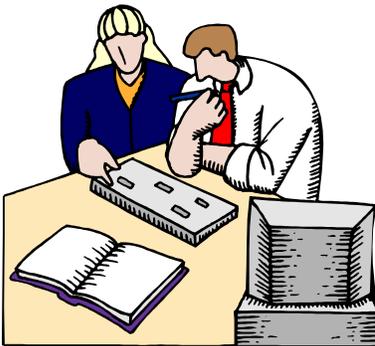
## **INFORMATION, INSTRUCTION, SUPERVISION AND TRAINING**

All persons involved with the permit to work process should have sufficient knowledge and understanding of their roles and responsibilities.

All parties need to consider what information should be passed between them and agree appropriate ways to make sure this is done. They need to exchange clear information about risks arising from their operations, including relevant safety rules and procedures and procedures for dealing with emergencies. This exchange of information should include details of any risks the other parties could not reasonably be expected to know about. The information must be specific to work.

### **Consulting the Workforce**

Clients, contractors and sub-contractors must consult their employees on health and safety matters. Where there are recognised trade unions, consultation should be with safety



representatives. However, the workforce is represented, it should be part of the liaison arrangements set up by the clients and should be involved from the outset.

### **What is Competence?**

This can be defined as the ability to undertake responsibilities and perform activities to a recognised standard on a regular basis. It is a combination of skills, expertise and knowledge.

### **Employees and Safety Reps**

Consulting with trade union appointed safety representatives (*see Safety Reps and Safety Committee Regulations 1977*) or other employee representatives (*see Health & Safety Consultation [with employees] Regulations 1996*) is a legal requirement. Working with safety representatives and employees' representatives is a very useful means of communicating on health and safety matters in the workplace.

**Remember: involving employees in decisions can help to foster closer working relationships and make employees more receptive to new ideas.**



### **USEFUL SOURCES OF INFORMATION**

FLIHSC – Safe Systems of Work  
[www.britfoot.com](http://www.britfoot.com) [www.bcleathertech.com](http://www.bcleathertech.com)

[www.community-tu.org](http://www.community-tu.org)

FLIHSC – Electrical Safety & Testing  
[www.britfoot.com](http://www.britfoot.com) [www.bcleathertech.com](http://www.bcleathertech.com)

[www.community-tu.org](http://www.community-tu.org)



FLIHSC – Workplace Transport Safety  
[www.britfoot.com](http://www.britfoot.com) [www.blcleathertech.com](http://www.blcleathertech.com)  
[www.community-tu.org](http://www.community-tu.org)

FLIHSC – Safe Work at Heights  
[www.britfoot.com](http://www.britfoot.com) [www.blcleathertech.com](http://www.blcleathertech.com)  
[www.community-tu.org](http://www.community-tu.org)

FLIHSC – Isocyanates  
[www.britfoot.com](http://www.britfoot.com) [www.blcleathertech.com](http://www.blcleathertech.com)  
[www.community-tu.org](http://www.community-tu.org)

FLIHSC – Fire Risk – Safety Assessment  
[www.britfoot.com](http://www.britfoot.com) [www.blcleathertech.com](http://www.blcleathertech.com)  
[www.community-tu.org](http://www.community-tu.org)

FLIHSC – COSHH  
[www.britfoot.com](http://www.britfoot.com) [www.blcleathertech.com](http://www.blcleathertech.com)  
[www.community-tu.org](http://www.community-tu.org)

Safe Interventions - Aide memoire on entry into confined spaces -  
[www.hse.gov.uk/paper/app2confinedspaces.doc](http://www.hse.gov.uk/paper/app2confinedspaces.doc).

Guidance on permit to work systems -  
[www.hse.gov.uk/pubns/priced/hsg250.pdf](http://www.hse.gov.uk/pubns/priced/hsg250.pdf)

Use of Contractors: A Joint Responsibility INDG368 [www.hse.gov.uk/pubns/indg368.pdf](http://www.hse.gov.uk/pubns/indg368.pdf)

HSE Safety Representatives web pages  
[www.hse.gov.uk/involvement/hsrepresentatives.htm](http://www.hse.gov.uk/involvement/hsrepresentatives.htm)

**APPENDIX 1. Designing a permit to work – some of the essential elements:**

Name of company:
Permit title:
Permit reference no:
Date of issue:
Name of authorised person:
Name of appointed contractor:
Job location:
Plant identification:
Description of work to be done and its limitations:
How the workforce is to be consulted:
Hazard identification – including residual hazards and hazards associated with the work:
Precautions necessary and actions in the event of an emergency – people who carried out precautions, eg isolating, authority, should sign that precautions have been taken:
Protective equipment including PPE:
Issue – signature (issuing authority) confirming that isolations have been made and precautions taken, except where these can only be taken during the work. Date and time duration of permit. In the case of high hazard work a further signature from the permit authoriser will be needed:
Acceptance – signature confirming understanding of work to be done, hazards involved and precautions required. Also confirming permit information has been explained to all permit users:
Extension/shift handover procedures – signatures confirming checks made that plant remains safe to be worked upon and new performing authorities and permit users made fully aware of hazards/precautions. New expiry time given:
Hand-back – signed by performing authority certifying work completed. Signed by issuing authority certifying work completed and plant ready for testing and recommissioning:
Cancellation – certifying work tested and plant satisfactorily recommissioned:
Anticipated time of closure:

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This document will be available on the following websites:

British Footwear Association – [www.britfoot.com](http://www.britfoot.com)

UK Leather Federation – [www.uk.leather.org](http://www.uk.leather.org)

Community – [www.community-tu.org](http://www.community-tu.org)