

The Confined Space Permit

Info Sheet 9 a

Besides becoming a record of what was done, organizations use a Confined Space Permit as a prompt to help people remember what to do or as a generic procedure. However, according to the "Checklist Manifesto" by Dr. Atul Gawande, most organizations do not have sufficient procedures and training to make a checklist an effective memory jogger. In addition, without sufficient written documentation and training, many permits are improperly completed. Most Regulated Confined Spaces must have a completed permit containing specific information at the entry point. But what about regulated areas that are not confined spaces or non regulated confined spaces? Do they require permits? To best answer these questions, it is important to understand what a permit does and should contain. A permit is a multi-purpose document, but at the end of the day, it will become a record that should enable a reader to reconstruct what went on, in, or around the space during the task. In other words, the Permit is proof of your due diligence efforts. To achieve this, the permit should contain sections to record:

- (a) space and work details mentioning the specific space as well as the type and when the work was performed will enable the reader to ensure they are looking at the right document.
- (b) last minute hazard review listing the hazards found, including any discrepancies in hazards that were found on the original assessment verses on that particular day's entry. This allows the reader to gain understanding as to why some decisions were made.
- (c) hazard control deployment noting what controls were implemented. This information in conjunction with the last minute hazard review, tells the reader how hazards were mitigated or controlled during the job.

(d) verification/authorization - detailing those who participated in the preparation and entry into the space. The reviewer is then able to contact those involved for further information.

(e) deviations and notations - to capture what occurred during the work. This information could be the entries and exits of the workers, gas monitor results, weather, hazard changes, etc.. These details provide further data to the reader as to why a specific course of action was taken.

With all this in mind, your permit should be set up in a way to ensure the data you need is captured during the project. Another consideration when designing the form is that most tradespersons hate paperwork.



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Info Sheet 9 b

The "Checklist Manifesto" provides a revealing look at checklist design and implementation. Everyone thinks it is so easy, but it is not. Words that have different meanings and statements can have different degrees of completeness. Complex forms may be difficult to complete and simple jobs may render most check boxes "not applicable or N/A". Too many, "N/A's" may lull some people into a false sense of security and then the only thing you check is whether or not the pen you are using is working.

When designing your form, we suggest having at least two distinct forms. We will call the first form a log and the second form a permit. The log would record space details as well as deviations and notations. You could use this log on jobs in confined spaces with limited access or egress or with spaces that have non atmospheric hazards that could produce non Critical injuries. A log could be as simple as a notebook or a template that has blanks for specific information. Blanks can cause problems if the recorder has poor grammar and spelling skills. However, having a laminated list of key words with the Attendant can reduce the mistakes. Other actions to reduce the writer's block is wanting specific information in the log. For instance your procedures could list generic entry choices (e.g. weather - high humidity, sunny, rainy, or windy or personnel entries, etc.). Keep the log fairly simple in design. For the other two types of spaces (see flow chart in the Introduction Sheet), you would use the log in conjunction with a permit. The permit's design should use a combination of pick lists, check boxes and blanks. Completion of the form should follow the steps in the project and mirror the sequence in supporting documents. The form should also be efficient to complete. In addition, it should limit duplication of information found in any other form.

It is important to have detailed written procedures on how to complete these forms and what data is to be included. As the "Checklist Manifesto" points out, lack of procedures and training on how to fill out the form is the main reason these things fail us when we need them most. Finally, these forms must be reviewed and marked for completion at the end of the job. Your audit should ensure:

- a. all blanks are filled in properly
- b. slight deviations in penmanship showing the form was completed at different times
- c. data is accurate (eg. names and signatures match, hazard listing is accurate and all personnel are recorded out of the space)
- d. times are not always rounded to the nearest number
- e. descriptions of the issues that arise are complete, understandable and what was done about it (eg. plan deviations, etc.) is also complete and understandable.
- f. improvements needed for next time



Info Sheet 9 c

This monitoring does two things. First, it signals to all the documentation is important to complete properly. Secondly, you will identify missing information quickly and have a chance to obtain the information before it is lost.

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The Confined Space Permit

Info Sheet 9 d

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