

WHSMP09: Permit to Work - Hazardous Work

Section 1 - Purpose and Scope

- (1) The purpose of this Permit-to-Work Procedure is to establish a controlled, systematic process for authorising and managing defined hazardous work activities undertaken on behalf of Southern Cross University (SCU).
- (2) The Permit-to-Work system is a task-level authorisation and verification control. It confirms that hazards have been assessed and required controls implemented prior to high-risk work commencing. The Permit-to-Work does not replace risk assessment, contractor management, or operational supervision responsibilities.
- (3) This Procedure ensures that hazardous work does not commence unless:
- the scope of work is clearly defined;
 - hazards have been identified;
 - critical risk controls have been implemented and verified; and
 - emergency arrangements are in place.
- (4) The Permit-to-Work system functions as a task-level control within SCU's broader contractor safety and work authorisation framework and operates under defined governance, ownership and accountability arrangements described in Section 3.
- (5) This Procedure applies to all SCU campuses, sites and facilities where permit-controlled hazardous work is undertaken, including work performed by:
- contractors and subcontractors;
 - SCU employees; and
 - other authorised persons undertaking hazardous work on behalf of the University.
- (6) This Procedure applies only to hazardous work activities requiring a Permit-to-Work and does not replace or override other risk management, authorisation or contractor engagement requirements.
- (7) This Procedure is a supporting procedure to the [Contractor Safety Procedures](#).
- (8) Where contractor work is undertaken a valid Authority to Work must be issued in accordance with the Contractor Safety Procedures before a Permit-to-Work may be issued. The Permit-to-Work:
- does not authorise contractor engagement;
 - does not provide site access; and
 - does not replace contractor pre-qualification, induction or procurement requirements.
- (9) In the event of any inconsistency:
- the [Contractor Safety Procedures](#) takes precedence over this Procedure; and
 - work must comply with applicable WHS law and University requirements.

Section 2 - Definitions

(10) For the purpose of this Procedure, the following definitions apply:

- a. Authority to Work (ATW) - A formal authorisation issued by SCU confirming that a contractor and nominated individuals are permitted to undertake defined work at a specified location and for a defined period, subject to completion of required pre-qualification, induction and risk assessment requirements. Authority to Work is a prerequisite to a Permit-to-Work where applicable.
- b. Hazard - A situation, activity, condition, or source with the potential to cause injury, illness or harm to a person, or damage to property, plant, equipment, infrastructure, the environment, or the continuity of university operations.
- c. Hazardous Work (Permit-Controlled Work) - Work activities identified by SCU as requiring a Permit-to-Work due to the potential for serious harm if controls fail. Hazardous Work includes activities that meet the definition of High-Risk Work in the Contractor Safety Procedures where additional task-level control, isolation, or coordination is required.
- d. Permit-to-Work (PTW) - A formal, time-limited authorisation that permits specified hazardous work to proceed only after hazards have been identified, required controls implemented and verified, isolations confirmed where applicable, and emergency arrangements established.
- e. Permit Issuer - An authorised SCU representative responsible for issuing, suspending and closing a Permit-to-Work after confirming that all required preconditions and verification requirements have been met. The Permit Issuer does not supervise or direct how work is performed.
- f. Permit Holder - The competent person nominated by the contractor or work party who accepts the conditions of the Permit-to-Work and is directly responsible for ensuring work is carried out in accordance with the permit. For SCU workers, the Permit Holder is the competent person nominated by the relevant SCU area to lead and control the permitted activity.
- g. Verifier - An authorised person responsible for verifying that required controls have been implemented and remain effective at the worksite. Verification does not involve supervision of work activities or direction of work methods.
- h. Worker - An individual who carries out work in any capacity for or on behalf of SCU, as defined under the Work Health and Safety Act 2011.

Section 3 - Governance, Ownership and Accountability

Governance and Accountability

(11) The Permit-to-Work system forms part of the SCU Work Health and Safety Management System (WHSMS).

(12) Overall governance of this Procedure is exercised through the WHSMS governance framework.

(13) Workplace Health and Safety is responsible for:

- a. maintaining the integrity of the Permit-to-Work framework;
- b. defining system requirements, standards and assurance activities;
- c. ensuring alignment with WHS legislation, Codes of Practice and University risk governance.

(14) Operational areas are responsible for:

- a. implementing the Permit-to-Work system within their operational activities;
- b. ensuring compliance with this Procedure; and
- c. maintaining operational controls consistent with the WHSMS.

(15) Operational implementation does not confer authority to modify governance or system requirements.

Roles and Accountability

Permit Issuer

(16) The Permit Issuer is accountable for:

- a. issuing, suspending and closing Permits-to-Work in accordance with this Procedure;
- b. confirming that a valid Authority to Work is in place prior to issuing a Permit-to-Work where contractor work is undertaken;
- c. reviewing permit documentation to confirm hazards, controls, isolations and emergency arrangements have been identified, and that verification has been completed and confirmed by an authorised Verifier;
- d. ensuring permit conditions are clearly defined and communicated; and
- e. exercising stop-work authority where permit conditions are not met or controls are compromised.

(17) The Permit Issuer does not supervise contractor work or direct work methods.

Verifier

(18) The Verifier is accountable for:

- a. verifying that required controls have been implemented and remain effective at the worksite;
- b. conducting verification activities in accordance with the Contractor Safety Procedures;
- c. re-verifying controls where conditions change or work is interrupted; and
- d. exercising stop-work authority where verification cannot be confirmed or maintained.

(19) Verification does not involve supervision of work activities or direction of work methods.

Permit Holder

(20) The Permit Holder is accountable for:

- a. initiating the Permit-to-Work request and providing accurate and complete supporting information;
- b. accepting the conditions of the Permit-to-Work;
- c. ensuring work is carried out strictly within the approved scope and conditions;
- d. ensuring all persons working under the Permit-to-Work are briefed, competent and comply with Permit-to-Work requirements; and
- e. stopping work and escalating where conditions change or controls cannot be maintained.

System Governance and Assurance

(21) The Permit-to-Work system forms part of the WHSMS.

(22) Workplace Health and Safety is responsible for enterprise governance of the Permit-to-Work framework, including:

- a. maintaining the integrity and consistency of the Permit-to-Work system;

- b. defining authorisation, competency and role requirements for Permit Issuers, Verifiers and Permit Holders;
- c. monitoring compliance and undertaking assurance activities proportionate to risk;
- d. supporting implementation across all operational areas using the Permit-to-Work system; and
- e. ensuring lessons learned from incidents, audits and system reviews are incorporated into continuous improvement of the framework.

(23) All operational areas that utilise the Permit-to-Work system are responsible for:

- a. implementing the system in accordance with this Procedure;
- b. ensuring authorised personnel are competent and comply with permit requirements; and
- c. maintaining operational controls consistent with the WHSMS.

(24) Governance and assurance responsibilities do not extend to operational supervision of contractor work or direction of work methods.

Role Boundaries

(25) The University retains responsibility for governance, authorisation, verification and assurance of hazardous work.

(26) Contractors retain responsibility for supervision of workers, development and implementation of safe systems of work, and execution of work activities.

(27) Nothing in this Procedure requires the University to direct how work is performed or transfers operational control or supervision from contractors to the University.

Section 4 - General Principles of the Permit-to-Work System

Purpose of the Permit-to-Work System

(28) The Permit-to-Work (PTW) system is a risk control mechanism used to manage hazardous work activities where failure of controls may result in serious harm.

(29) The PTW system:

- a. authorises defined hazardous work under controlled conditions;
- b. confirms hazards have been identified and required controls implemented;
- c. provides structured control of work scope, change, interruption and close-out; and
- d. supports coordination of concurrent high-risk activities.

(30) A Permit-to-Work does not replace risk assessments, safe systems of work, competency requirements, or contractor supervision arrangements.

When a Permit-to-Work Is Required

(31) A Permit-to-Work is required where work meets the definition of High-Risk Work as defined in the Contractor Safety Procedures, and where the activity is designated by the University as permit-controlled. This includes High-Risk Work involving:

- a. High-Risk Construction Work;

- b. University Critical Risks requiring permit controls; and/or
- c. Specific high-risk activities requiring formal isolation or coordination.

(32) This requirement applies to all relevant work, irrespective of whether it is performed by contractors or SCU workers, and regardless of whether the activity is routine, infrequent, short duration, or time-critical.

(33) Typical activities requiring a Permit-to-Work include, but are not limited to:

- a. confined space entry;
- b. hot work;
- c. excavation or trenching;
- d. working at heights (where permit threshold applies);
- e. electrical isolation or energised electrical work;
- f. asbestos-related work;
- g. crane lifts or critical lifting operations;
- h. mobile plant operations where interface risk exists;
- i. structural alterations and penetrations;
- j. live electrical work;
- k. any activity designated by SCU as permit-controlled due to critical risk.

Preconditions to Permit Issue

(34) A Permit-to-Work must not be issued unless:

- a. the scope of work is clearly defined;
- b. hazards have been identified and assessed;
- c. required controls and isolations are implemented and verified;
- d. emergency and rescue arrangements are in place; and
- e. where contractor work is undertaken, a valid Authority to Work is confirmed.

(35) Where these conditions are not met, work must not proceed.

Change Management

(36) Any change to the following will trigger a review to the Permit-to-Work:

- a. scope of work;
- b. work methods;
- c. personnel;
- d. site conditions; or
- e. concurrent activities

(37) Where risk increases or conditions change, the permit must be amended, re-verified, suspended or withdrawn.

(38) Work must not continue where permit conditions no longer reflect actual work conditions.

Stop-Work Authority

(39) Stop-work authority applies at all times.

(40) Work must cease immediately where:

- a. permit conditions are not met;
- b. required controls fail or are not maintained;
- c. site conditions change and increase risk; or
- d. verification cannot be confirmed.

(41) Stop-work may be initiated by:

- a. the Permit Issuer;
- b. the Verifier;
- c. the Permit Holder; or
- d. any worker identifying an unsafe condition.

(42) Work must not recommence until issues are resolved and authorisation is re-confirmed.

(43) Stop-work authority does not transfer operational supervision or control of work.

Permit Validity

(44) A Permit-to-Work:

- a. is valid only for the approved scope, location and timeframe specified in the Permit-to-Work;
- b. must be reviewed where work extends across multiple days or shifts; and
- c. must be revalidated where work is interrupted, suspended or conditions change.

(45) Permits must not be reused for unrelated activities or locations.

Concurrent Work Interface

(46) Where multiple permit-controlled or high-risk activities occur concurrently:

- a. interface risks must be identified and managed;
- b. permit conditions must address interaction risks; and
- c. coordination arrangements must be established to prevent conflict.

Permit-To-Work Process Overview

(47) The Permit-to-Work process ensures hazardous work is authorised, controlled and completed safely.

Permit Application

(48) The Permit Holder must:

- a. define scope of work;
- b. complete risk assessment or Safe Work Method Statement (SWMS);
- c. identify required isolations and emergency arrangements;
- d. confirm Authority to Work (where applicable).

(49) Incomplete applications must not proceed.

Permit Review and Issue

(50) The Permit Issuer must verify:

- a. hazards and controls identified;
- b. isolations and emergency arrangements in place;
- c. required verification is complete.

(51) Permits must not be issued where requirements are not met.

Work Under Permit

(52) Work must remain within the approved scope of the permit.

(53) Workers must be briefed and signed onto permit.

(54) Deviations require escalation.

Change Management

(55) Where scope, personnel or conditions change, the permit:

- a. must be reviewed; and
- b. amended, re-verified, suspended or withdrawn if risk increases.

Permit Close-Out

(56) The Permit Holder confirms completion and safe condition.

(57) The Permit Issuer verifies and closes permit.

Verification, Monitoring and Assurance

(58) Verification, monitoring and assurance activities ensure Permit-to-Work conditions are implemented and maintained.

Verification

(59) Verification must be completed by an authorised person prior to commencement of permit-controlled work.

(60) Verification confirms required controls, isolations and permit conditions are in place.

(61) Re-verification is required where work is interrupted, conditions change, or controls are disturbed.

(62) Work must not proceed unless verification is confirmed.

Monitoring

(63) Permit-controlled work must be actively monitored to confirm compliance with permit conditions.

(64) Monitoring may include inspections, spot checks or review of permit documentation.

(65) Monitoring does not transfer operational supervision of work.

Assurance and Audit

(66) Workplace Health and Safety will undertake periodic assurance or audit activities to confirm the effectiveness of the Permit-to-Work system.

(67) Operational areas must cooperate with verification and assurance activities.

Non-Compliance

(68) Where permit conditions are not met, work must cease immediately. Non-compliance must be escalated in accordance with University incident management processes.

Training and Authorisation

(69) Only persons who are trained, competent and formally authorised may perform roles within the Permit-to-Work system.

(70) Authorisation is based on demonstrated competency relevant to the hazards and activities being authorised and is not automatically conferred by position or job title.

Permit Issuers

(71) Permit Issuers must:

- a. be formally authorised by the University;
- b. complete required PTW training; and
- c. demonstrate competency in the hazards and activities within their authorised scope.

(72) Permit Issuers may only issue permits for activities they are competent and authorised to assess (e.g. working at heights, confined space entry, electrical work).

(73) Authorisation requirements are defined in each Permit-to-Work form.

Verifiers

(74) Verifiers must:

- a. be formally authorised;
- b. be competent in the hazards and controls being verified; and
- c. operate within the scope of their authorisation.

Permit Holders

(75) Permit Holders must:

- a. be competent in the work being undertaken; and
- b. ensure workers under the permit understand permit conditions.

(76) Where contractors act as Permit Holders, competency and authorisation must be confirmed through the Authority to Work process.

Authorisation Management

(77) Records of training and authorisation must be maintained in accordance with University requirements.

(78) Authorisation may be suspended or withdrawn where competency, compliance or safety requirements are not met.

Section 5 - Roles and Responsibilities

(79) Refer to [WHSMP13: Responsibility and Accountability Statement](#).

Section 6 - Records of Documentation

(80) All records generated under the Permit-to-Work system must be retained in accordance with Work Health and Safety legislative requirements and University record-keeping requirements.

(81) Records include, but are not limited to:

- a. Permit-to-Work applications and issued permits;
- b. verification and re-verification records;
- c. sign-on or briefing records;
- d. permit suspensions, withdrawals and close-out records;
- e. associated risk assessments, Safe Work Method Statement (SWMS) and emergency arrangements;
- f. authorised Permit-to-Work forms;
- g. relevant training or competency records; and
- h. incidents or events occurring during permitted work.

(82) Records must be accurate, legible and readily retrievable where required for monitoring, assurance, audit or investigation purposes.

Section 7 - Revision and approval history

(83) This Procedure will be reviewed as per nominated review dates, or earlier where required, including in response to:

- a. legislative or regulatory changes;
- b. internal or external audit outcomes;
- c. incidents or investigation findings;
- d. significant changes to University operations or risk profile; or
- e. outcomes of management review or assurance activities.

(84) Updates may be made to ensure the Procedure remains effective, practical and aligned with the WHSMS.

Section 8 - References

(85) The Procedure aligns with:

- a. [Work Health and Safety Act 2011 \(NSW\)](#)
- b. [Work Health and Safety Act 2011 \(QLD\)](#)
- c. [Work Health and Safety Regulation 2025 \(NSW\)](#)
- d. [Work Health and Safety Regulation 2011 \(QLD\)](#)

- e. Relevant WHS Codes of Practice (NSW and QLD)

Section 9 - Related Documents

(86) The following documents, procedures, forms and systems support the application of this Procedure and must be considered where relevant:

- a. [Southern Cross University Work Health and Safety Management System \(WHSMS\), including associated policies, procedures and standards](#)
- b. [Contractor Safety Procedures](#)
- c. [WHSMP02: Hazard Identification, Risk and Opportunity Management](#)
- d. [WHSMP17: Incident Management, Reporting and Investigation](#)
- e. [HRP07: Electrical Safety](#)
- f. [HRP19: Confined Space](#)
- g. [HRP02: Working at Heights](#)
- h. [HRP21: Excavation and Trenching](#)
- i. [HRP03: Asbestos Management](#)
- j. [HRP04: Plant and Equipment](#)
- k. [WHSMP13: Responsibility and Accountability Statement](#)
- l. [WHSMP15: Audit and Assurance](#)
- m. Permit-to-Work application and approval form
- n. WHSMP09-FOR-01 - Mobile Lift Permit
- o. WHSMP09-FOR-02 - Hot Work Permit
- p. WHSMP09-FOR-03 - Working at Heights Permit
- q. WHSMP09-FOR-04 - Excavation Permit
- r. WHSMP09-FOR-05 - Confined Space Entry Permit
- s. WHSMP09-FOR-06 - Crane Lift Permit
- t. WHSMP09-FOR-07 - Confined Spaces Rescue Plan
- u. WHSMP09-FOR-08 - Structured Alterations & Penetrations Permit
- v. WHSMP09-FOR-09 - Asbestos & ACM Disturbance Permit
- w. WHSMP09-FOR-10- Live Electrical Permit
- x. Any other approved Permit-to-Work supplementary forms relevant to the activity being undertaken.

Status and Details

Status	Current
Effective Date	20th April 2026
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Responsible Executive	Kim Franks Vice President (People and Culture)
Head of Work Unit	Brendan Pearce Director, Workplace Relations
Enquiries Contact	Shaun Brown Manager, Workplace Health and Safety <hr/> Vice President (People and Culture) portfolio