SUBJECT: 4.2 (G) CONFINED SPACE

1.0 POLICY

Some spaces within the Victoria University facilities are classified as confined spaces according to the Ontario Occupational Health and Safety Act and Ontario Regulation 632/05 Confined Spaces, (O.R. 632).

It is the policy of Victoria University that all spaces identified as confined spaces are under the care and control of Infrastructure and Sustainability, (I&S), and shall be entered only by competent persons employed or contracted by Victoria University, in accordance with this program and O.R. 632.

2.0 PURPOSE

The purpose of this program is to define the responsibilities and processes for the identification of confined spaces and management of confined space entries.

3.0 SCOPE

This program applies to:
- Victoria University facilities in Toronto, Ontario
- All confined spaces owned by or under the jurisdiction of Victoria University
- Victoria University staff who have authority over a confined space; may perform or organize any work related to or grant access to a confined space; or have duties that include the control or supervision of a confined space

This program does not apply to Authorized Entry Only spaces. Such spaces, while potentially hazardous, are not Confined Spaces. Authorized Entry Only Spaces may be entered only with authority and approval of I&S, further to consideration, assessment and reasonable control of identified hazards, by competent persons.

Emergency work conducted by or under direction of firefighters or a fire department as defined in Fire Protection and Prevention Act, or by a gas technician certified under the Technical Standards and Safety Act, 2000, working under the direction of a fire department, are exempted from the requirements of this program by O.R. 632.
4.0 ROLES AND RESPONSIBILITIES

This section identifies the general responsibilities of the various Victoria University personnel involved with confined space entries.

4.1 EMPLOYER SHALL

- Provide the necessary human and financial resources to implement and support this program.

4.2 I&S SHALL

- Consult with the JHSC and other affected stakeholders regarding this program on change to the workplace environment.
- Ensure that an inventory of confined spaces is developed, documented and maintained by a competent person.
- Ensure that identified confined spaces are appropriately marked/sign.
- Retain care and control of all identified confined spaces at Victoria University.
- Ensure that confined spaces are entered only with authorization and approval from I&S, by competent persons and in accordance with this program.
- Identify responsible supervisor or manager for each approved and authorized entry.
- Ensure that only competent contractors are sourced for confined space entries in accordance with this program and the Contractor Safety Program.
- Ensure that all Victoria University stakeholders that are managing, supervising, performing, involved in or affected by confined space entry are trained in this program and assigned tasks and are competent to perform those tasks.

4.3 MANAGERS/SUPERVISORS SHALL

- Attend training, commensurate with duties related to confined spaces and this program.
- Ensure that no confined space is entered without authorization and approval from I&S.

4.4 SENIOR MANAGER CAMPUS OPERATIONS, I&S (OR DESIGNATE) SHALL

- Grant authorization and approval of I&S for any proposed entry of a confined space.
- Assign only trained and competent workers to tasks related to confined space entry and related works.
- Ensure that a hazard assessment of any confined space is conducted or confirmed and documented prior to an entry using the Confined Space Assessment Form that is part of this program or contractor equivalent.
- Ensure that an entry plan that documents reasonable controls for hazards identified in the hazard assessment is developed and documented on the Confined Space Entry Permit that is part of this program, or contractor equivalent, prior to an entry.
• Ensure all equipment, materials and protective devices required to protect workers when performing confined space entry and related work as documented on the entry plan are available and maintained in good working order.

• Ensure that a space specific rescue plan that outlines adequate and appropriate equipment and tools is developed and documented prior to an entry, and personnel trained in that rescue plan including use of the documented equipment and tools are available at the space during the entry.

• Ensure that entries occur in accordance with the entry permit and entry plan.

• Ensure that the entry permit records monitoring of the atmosphere within the space, authorization to entry, records of all entrants and exits from the space and is posted at the space.

• Initiate a Multiple Employer Coordination Document for each entry that is performed by or involves a contractor, documenting distribution of responsibilities to contractor and Victoria University.

• Communicate Multiple Employer Coordination Document to contractor. Get contractor signature confirming acceptance of responsibilities. Retain signed coordination document with other records related to the entry. Provide copy to the contractor.

• Monitor confined space entry to ensure conformance with requirements of the entry permit, this program and O.R. 632

• Promptly report to I&S and address issues of non-conformance when identified

• Collect records and approvals related to confined space entry for retention.

4.5 CONTRACTOR SHALL

• Sign to record acceptance of responsibilities for entry as documented on Multiple Employer Coordination document

• Ensure a competent person conducts and documents a confined space hazard assessment; develops and documents an entry plan that reasonably controls identified hazards; develops and documents a rescue plan prior to a confined space entry.

• Assign only trained and competent workers to tasks related to confined space entry, space attendance, emergency response/rescue and related works.

• Appoint a competent Entry Supervisor that ensures that entry occurs in accordance with entry plan.

• Ensure Entry Supervisors, Attendants, Entrants and rescue personnel are identified to all Victoria University staff involved in a particular entry.

• Ensure all equipment, materials and protective devices required to protect workers when performing confined space entry and related work as documented on the entry plan are available and maintained in good working order.

• Ensure that entries occur in accordance with this program, legislation and entry plans and that entry permits are created and posted for each entry
• Provide copy of entry permit and rescue plan to Victoria University, Senior Manager, Campus Operations, I&S for each entry

4.6 ADMINISTRATIVE MANAGER, I&S, SHALL
• Assist with retention of records related to confined space entries as required
• Initiate review of this program on change to legislation or facility, in consultation with JHSC.

4.7 WORKERS (Victoria University) SHALL
• Not enter any identified confined space unless trained to do so and entry is authorized and approved by I&S.
• Participate in training related to confined spaces as provided.
• Perform work related to confined space entry in accordance with training, and this program

5.0 PROCEDURES

5.1 Identification of Confined Spaces
• If possible, on design of new work spaces, consideration and priority shall be given to:
  • avoid the creation of spaces that meet the definition of confined space, and
  • the implementation of systems, devices and tools that eliminate the need to enter a confined space.
• I&S will ensure that all confined spaces are identified by a competent person and inventoried on the Confined Space Inventory Form. This inventory shall consider the conditions within the space under normal conditions. This inventory shall be maintained and updated further to changes to the workplace.
• I&S will ensure that each identified confined space is secured against such unauthorized entry, and/or clearly identified as a confined space with permanent signage, appropriate to the environment, at the space access entry points. The signage shall indicate that the space is a confined space, and prohibit unauthorized entry into the space

5.2 Entry Plans
• The confined space entry plan shall define, as applicable:
  • Duties of all those involved with the entry
  • Atmospheric testing requirements
  • Means of entering and exiting the confined space
  • Methods to prevent unauthorized entry
  • Coordination of multiple employers
  • Ventilation and/or purging means and methods.
  • Required personal protective equipment, clothing and devices
  • Means for isolating energy sources and controlling materials movement
• Procedures for working in flammable or explosive atmospheres
• Attendants’ duties and responsibilities
• Rescue procedures, rescue equipment and communication methods

5.3 Confined Space Entry Permits

• An entry permit shall be completed prior to each entry, (per work shift) and shall confirm all known hazards are identified and controlled.
• The entry supervisor shall communicate the permit contents to all staff involved in the entry or responsible to perform related works and shall ensure that the permit remains posted and readily available to every person who is involved in the entry at the confined space.

5.4 Confined Space Emergency Rescue Procedures

• Prior to a confined space entry commencing, an emergency rescue plan must be in place and communicated to affected staff. The plan must consider the confined space hazard assessment, the location of the workplace and the space and required response time necessary and first aid availability.

• Emergency rescue personnel, equipped with adequate knowledge, training, procedures, tools and equipment appropriate to implement the rescue plan in order to minimize harm to both themselves and the entrants must be available at the workplace in close proximity to the space being entered.

5.5 Isolation of Hazardous Energy and Control of Materials Movement

• The presence of hazardous energy sources, the potential for material movements and/or engulfment by materials, is identified through the space assessment performed prior to entry.

• Control of hazardous energy sources shall be performed in accordance with Victoria University Hazardous Energy Control Program and its application to the entry must be documented on the Entry Permit.

5.6 Measurement and Control of Atmospheric Hazards

• Potential hazards related to confined space atmospheres are identified during the space assessment performed prior to the entry.

• Appropriate monitoring and control of identified atmospheric hazards are documented on the Entry Permit and may include as appropriate:
  • Appropriate work controls and limitations for toxic, oxygen enriched or oxygen deficient, flammable or explosive atmospheres
  • Adequate ventilation and/or purging
  • Inspection and calibration of air-monitoring devices and equipment in accordance with manufacturer’s specifications, prior to use
- Pre-use functional test of equipment as per manufacturer’s requirement
- Retention of calibration and bump test records
- Testing of space atmospheres prior to every entry or re-entry
- Continuous atmospheric monitoring of a space during entry

5.7 Contractors and Coordination of Multiple Employers

- Any entry into a confined space authorized and approved by I&S or work related to such an entry that must be contracted shall be contracted to a competent contractor.

- Through ownership of the space Victoria University will retain the role of Lead Employer in an entry. Prior to each entry, the Senior Manager Campus Operations, I&S shall document and confirm the delegation of responsibility with all involved contractors through completion and signatures of all parties, (Lead Employer and involved Contractors) on the Multiple Employer Coordination Form

- Senior Manager, Campus Operations, I&S will support safety entry by the competent contractor by disclosing to the contractor any hazard knowledge or information in his/her possession or in the possession of the Victoria University with regards to the confined space

- In the event of a confined space entry on a construction project at Victoria University, the role of Lead Employer will be fulfilled by the party identified as the Constructor for the project. The Constructor may be a separate party contracted by Victoria University and would then be responsible for completion of the Multiple Employer Coordination Form.

5.8 Training

- Victoria University staff that have care and control of confined spaces, are involved in the organization, performance of or contracting of confined space entry or are affected by confined space entry, including Senior Manager, Campus Operations, I&S, delegates for Senior Manager, Campus Operations, I&S, and the JHSC, shall be trained in applicable legislation and this program by a competent trainer.

- Records of confined space training must be kept on file including names of those who participated in the training, name and credentials of trainers and date of training.

- Training of contracted entrants, rescuers, attendants and entry supervisors is the responsibility of that contractor. Training must meet frequency and content requirements define by Ontario Regulation 632/05 Confined Spaces.
• Confirmation of such training for contracted parties shall be requested by Victoria University prior to contract approval and prior to I&S authorization and approval for entry. Training records may be audited during the work in accordance with the Victoria University Contract Management Program.

5.9 Records Retention

• The Senior Manager, Campus Operations, I&S shall keep all records related to confined spaces and confined space entries on file in a retrievable manner.

• Such records include:
  • Confined Space Inventory
  • Confined Space Assessments
  • Training records of internal staff
  • Contracts for competent contractors contact for confined space entry
  • Multiple Employer Coordination Forms for each entry
  • Entry permits, plans and rescue plans for each entry.

• Such records shall be retained for at least 2 years or longer such that the two most recent records of each kind that relate to a particular confined space are retained.

6.0 COMMUNICATION

This procedure will be communicated to all employees working in or around a confined space and JHSC.

Entry permits shall be posted at the point of entry during any confined space entry.

7.0 MONITORING/CONTRAVENTIONS

Victoria University will review this program in consultation with JHSC on change to applicable legislation or the workplace.

Senior Manager, Campus Operations, I&S shall monitor for conformance with this program during entries.

8.0 LEGISLATIVE & ADMINISTRATIVE AUTHORITIES

• Ontario Occupational Health and Safety Act
• Ontario Regulation 632/05 Confined Spaces
• MLITSD Confined Spaces Guide
9.0 Definitions

**Adequate** when used in relation to a procedure, plan, material, device, object or thing, means that it is,

(a) sufficient for both its intended and its actual use, and
(b) sufficient to protect a worker from occupational illness or occupational injury;

**Administrative Manager** means Administrative Manager, I&S

**Assessment** means an assessment of hazards with respect to one or more confined spaces in a workplace

**Attendant** means a worker who is located outside the confined space and is assigned to continuously monitor work that is being carried out in or near the space and who is competent to provide support or response for the safety of the entry team.

**Atmospheric hazards** means,

(a) the accumulation of flammable, combustible or explosive agents,
(b) an oxygen content in the atmosphere that is less than 19.5 per cent or more than 23 per cent by volume, or
(c) the accumulation of atmospheric contaminants, including gases, vapours, fumes, dusts or mists, that could,
   (i) result in acute health effects that pose an immediate threat to life, or
   (ii) interfere with a person's ability to escape unaided from a confined space.

**Authorized Entry Only Space** means a fully or partially enclosed space that is both not designed and not constructed for continuous human occupancy but in which atmospheric hazards do not occur under normal circumstances.

**Confined Space:** “confined space” means a fully or partially enclosed space,

(a) that is both not designed and not constructed for continuous human occupancy, and
(b) in which atmospheric hazards may occur because of its construction, location or contents or because of work that is done in it.

**Entrant** means a worker who enters a confined space.

**Entry:** The action by which a person passes through an opening into a confined space. Entry is considered to have occurred as soon as any part of the entrant’s body breaks the plane of an opening into a confined space.

**Senior Manager, Campus Operations, I&S / Supervisor** means an individual who has been assigned the responsibility for directing all aspects of a confined space entry and has the authority to effect change.
Flammable/Explosive Atmosphere: An atmosphere that contains a concentration of flammable vapour, gas, or combustible dusts that presents a fire or explosion hazard in relation to the type of work to be performed.

JHSC: means the Joint Health and Safety Committee

Lead employer means an employer who contracts for the services of one or more other employers or independent contractors in relation to one or more confined spaces that are located,
   (a) in the lead employer's own workplace, or
   (b) in another employer's workplace

Oxygen Deficient Atmosphere: An atmosphere with oxygen content of less than 19.5 % by volume.

Oxygen Enriched Atmosphere: An atmosphere with oxygen content of greater than 23 % by volume.

Related work: Work that is performed near a confined space in direct support of work inside the confined space. Examples of related work may include, and not be limited to, emergency response/rescue, control of hazardous energy sources, hot works, and attendant works.

8.0 RELATED PROCEDURES

- Health and Safety Responsibilities
- Lockout Tagout Procedure
- Contractor Safety Program

9.0 FORMS

- Confined Space Inventory
- Confined Space Multiple Employer Coordination Document
- Confined Space Assessment
- Confined Space Permit

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