



WPCG Newsletter: Edition 8, December 2022

Welcome to the eighth edition of the Work Place Clearance Group (WPCG) Newsletter.

It been a busy year for everyone as work picked up with the easing restrictions and then the flooding which impacted several states. Our thoughts are with those impacted and our thanks to service providers for supporting our sites to recover and re-open where possible to provide impacted communities with access to fuel and food.

As the end of year approaches and pressure mounts to close out jobs and get sites operational for Christmas remember to stay safe and there is Always Time To Do It Right.

This edition is focused on the content and outcomes of the WPCG Town Hall that was held in Sydney on the 26th October. Over 60 people attended the Town Hall which focused on the WPCG and the safety of our staff, contractors, and customers on our sites.

The Town Hall was opened by Max Paget, National Retail Safety Manager for Viva Energy and Chair of the WPCG Management Committee. During the opening Max officially welcomed **Chevron** into the WPCG. Chevron will be represented on the WPCG Technical committee by Chris Best Field HSE Advisor for Chevron and have committed to adopting all the WPCG requirements on their sites including the Retail Site Induction, Work Clearance, and Work Permits.

Following the opening each of the WPCG members shared incidents on their facilities highlighting the importance of getting things right and JulSen shared the findings from the WPCG Desktops and Site Inspections that were introduced this year as part of the WPCG continuous improvement process.



After morning tea two break sessions were held. The first was on topics chosen by the WPCG including traffic, isolations, concrete cutting and SWMS/JSA with the aim of coming up with the challenges, ideas, and improvements on what could be done and items for the WPCG to consider incorporating into the WPCG system. The outcomes of which will be used by the WPCG to plan their activities for 2023.

The second breakout session was an opportunity for the contractors to provide feedback to the WPCG on whatever topic they chose to discuss. Some of these were a continuation from the first session, others included feedback to the WPCG on what was working, what could be improved in the WPCG processes or with their forms and general questions on the WPCG. You will find a number of the questions with answers on the last page of the newsletter.

With the success of the event the WPCG plan to hold another Town hall in 2023, hope you can make it.

Contact us:

E-Mail: enquiries@wpcg.com.au

Phone: (03) 9399 8002

Website: www.wpcg.com.au

We welcome the input and feedback from contractors using the WPCG system as we want this newsletter to be of value to you and your workforce, with the primary objective that it helps support workplace health and safety.

Incidents

1. Asset Strikes

Why

There were multiple contributing factors that caused this incident to occur

- Project manager went on emergency personal leave
 - Lack of adequate handover of actions, responsibilities, and site-specific build requirements when the PM went on leave
- Lack of supervision by onsite site supervisor during and when the under boring was being carried out
 - Lack of experience managing under bores
 - Didn't stop the bore when there was less than 500mm between the known service and the drill head
- Under borer using different machine due to large single bore machine not being available. A single bore of 1 x 600mm was the proposed method as discussed onsite with PM, Site Supervisor and client
 - No consultation or communication with client
 - Resulted in 4 x 125mm bore shots / increased risk
 - 4th bore shot was kept to the left due to hard ground / rock encountered
- Under borer indicated they were under time pressures
 - Moved bore entry position to reduce time of having to do 4 bores
- Site Supervisor informed his manager however there was no further escalations or notification to senior management or client
- Site Supervisor left site even though they knew there was an issue and did nothing to escalate
 - Even though it was recommended by the property manager that a plumber needed to be called to rectify
 - Site Supervisor had pre planned personal commitments and was booked to fly back to Melbourne



2. Battery powered tools/equipment in hazardous areas



Event: Work activity conducted without hot work controls ie. Hot work checklist, gas testing, etc. Contractor performing work activity requiring the use of a battery operated multi meter inside the hazardous area. Not rated for use in a hazardous are (certified to IEC 60079-11)

Root cause: Technician did not consider a multi meter as a battery-operated tool.

Points of improvements: Technicians intending to perform work activities in a hazardous area must read / familiarise themselves with all WPCG documentation and requirements. All tools including all battery powered tools/equipment e.g. multi meter, drills, phones, tablets, cameras, leaf blowers, etc. to be taken into hazardous areas must be risk assessed for WPCG compliance.

3. Unauthorised Hot works in a hazardous area

Event: Technician decided to attend an Ampol site outside business hours. Technician did not advice the onsite staff of the works. Despite not having a valid work order for the activity the technician decided to perform grinding activity in a hazardous area without a WPCG Work Permit, Hot work certificate, Atmospheric Testing & monitoring and hot work controls in place.

Root cause: Technician wanted to perform task without any traffic on the forecourt because it was safer and it was only going to take approx. 20-30seconds to grind the object. He wanted to make the Store Manager happy by removing the item and replace it with a better one to make it look better.

Points of improvements: Obtain authorisation to perform work activity e.g. Work order, Site staff approval. Implement and complete all WPCG requirements prior to commencing work activity.

WPCG Desktop & Site Inspection Findings

WPCG Desktop Inspections

- 298 WPCG Work Clearance Forms reviewed
- 6146 items checked, 791 flagged items
- Average score per form correct 87%
- Lowest scoring form 60%
- Each individual with flagged items is provided feedback

Top Flagged Items

Item	Finding
Work Clearance Form	
1. Authorisation to start work has been completed correctly?	No Name (site &/or contractor) No surnames
2. End of Day Sign Off completed correctly?	No Signature (site &/or contractor) Use of an X not Covid 19
3. Is the description of work clear?	Unclear what is being done eg: Inspection of oil probe and alarm Fridge Investigate water leak
4. Tools and equipment permitted for use clear?	Equipment unclear: Tools of trade, toolbox. No mention of a ladder or drill however, checklists in place. Hand tools referring to battery operated equipment.
5. From the description has the correct level of work authorisation been issued?	Unclear if correct or, Not identifying the required minimum control checklists
6. Tasks Requiring Minimum Controls Checklist section has been completed correctly?	
7. Controls required	Not identifying traffic management for pedestrians
Hot Work Checklist	
1. Gas Testing Requirements completed?	No bump test Bump test does not look right Missing make and model No gas test results
2. Name, Date & Job No. entered?	Left blank
3. Safety Precautions including hazardous areas completed?	Working inside a hazardous area, controls not identified
Ground Disturbance Checklist	
1. Name, Date & Job No. entered?	Left blank
2. Soil Boring, Drilling or Coring completed?	Controls not identified
Work At Height Checklist	
1. Name, Date & Job No. entered?	Left blank
2. Work From an EWP completed?	Controls not identified

WPCG Site Inspections

- 78 Site Inspections
- 18 Companies (arranged & random)
- All states & territories

Top Flagged Items Work Clearance Site Inspections

Item	Finding
1. For the documents completed were they correctly filled in	Lack of detail in the forms includes equipment or work description, incorrect signature's, gas test bump test results
2. Are the documents the correct versions WCv5 HWv3 WAHv3 GDv4	Mainly using PDF of checklist
3. Are work vehicles located to protect personnel from being struck?	When on the forecourt
4. Only work authorised on the paperwork is being undertaken	Either equipment being used does not match the form or the actual work being performed
5. Are the correct Work Authorisations in place?	
6. SWMS/JSA has been made site and task specific	JSA/SWMS not used or not accessible, not made site/task specific, different variations across companies
7. Have all workers signed the SWMS/JSA	
8. Is there a SWMS/JSA available	

Observations

- Additional workers on site have not have always completed the Retail Site Induction
- Ongoing gas testing issues - bump testing issues, understanding of bump test results vs test gas being used
- More than 1 Work Clearance form for the same job
- Workers don't always think about why they are doing something. Eg Gas detector on top of dispenser, walking without stopping when gas testing initial area, gas detector upwind of vapour source, vehicle parked on non-traffic side of work,

Comments

- More presence of WPCG to encourage contractors to do the right thing site, staff won't stop you
- Time to fill in the forms for small jobs inside
- Why do I have to have long sleeves when inside and the site staff don't. Have different requirements inside vs outside
- The test questions are too tricky. Not necessary. Simply test questions and make more relevant to the worker
- Refresher too long for a refresher
- Good to see auditing is happening
- All Workers to sign onto the Work Clearance Form

Top Flagged Items Work Permit Site Inspections

Item	Finding
1. For the documents completed were they correctly filled in	Incorrectly filled in, not enough detail, gaps missing information
2. Are the required controls in place?	SDS not available or incorrect
3. Are work vehicles located to protect personnel from being struck?	When on the forecourt
4. Only work authorised on the paperwork is being undertaken	Either equipment being used does not match the form or the actual work being performed
5. Are the correct Work Authorisations in place?	Checklists being used, or Certificate not in place
6. SWMS/JSA has been made site and task specific	JSA/SWMS not made site/task specific

Observations

- Large scopes of work being covered on a single permit, leading to limited detail
- Forms/Controls are open to interpretation and the Permit Receivers appear not to challenge/question the Permit Officer
- Reasonable handover from Permit Officer to Permit Receiver in terms of process, not always the detail/understanding
- Good processes on site for site control when a project
- Most were open to the audits and appreciated seeing someone on site
- Permit not being followed

Comments

- Your audit is more robust than many, its good, makes you think
- Good to see WPCG out in the field
- Functionally of the WPCG electronic form could be improved to help the risk assessment process
- Confined space log and Isolation Record as part of WPCG forms
- Once the initial training is done there is no implementation on site. Better process for new entrants into the industry as they can complete the training and then go out onto site and authorise work
- Can you come and do one of these on a job I'm running

FAQ

There were a number of questions submitted during the Town hall, we have done our best to answer most of these, in some cases it was unclear what was being asked, or if it was a suggested improvement to a form such as a wording change these have been noted for the next review of the form.

Work Permits / Permit Officer	
1	<p>Q. Is a Permit Officer required to complete a WCF to issue a permit?</p> <p>A. No. There is no requirement for a Permit Officer to issue a Work Clearance to cover them issue a Work Permit, just like there is no requirement for a Work Clearance Issuer to issue a Work Clearance to cover them to issue a Work Clearance. A Permit Officer would need to issue a Work Clearance and remain on site if the Permit Receiver is not a WPCG trained Work Clearance Issuer.</p>
2	<p>Q. Combining Permit Officer validation with Clearance issuer validation to reduce renewal / assessment time as the Permit Officer validation includes both requirements?</p> <p>A. The WPCG will review in 2023 as it requires a full review of the Permit Officer refresher as the refresher theory is currently covered in the Work Clearance Issuer refresher not in the Permit Officer refresher.</p>
3	<p>Why does a permit writer require to requalify every three years, in addition to the clearance issuer requalification?</p> <p>As per Q 2, and there are also IT changes required so a Permit Officer can issuer a Work Clearance from the WPCG system.</p>
4	<p>There could be a distribution list for electronic permits?</p> <p>As per the Work Authorisation procedure there must be a copy of the Work Permit on site, this can be paper or electronic. Anyone wanting to view the Work Permit can ask the Permit Receiver who MUST be on site while work is taking place or the Permit Officer if on site. The WPCG also generates a PDF of the Work Permit which the Permit Receiver or Permit Officer can distribute.</p>
5	<p>What happens if the Permit Receiver is incapacitated?</p> <p>If the Permit Receiver needs to leave site or cannot return the following day the Permit Officer should be contacted so they can add a new permit Receiver.</p>
6	<p>Who MUST HAVE CSE qualifications for a Confined Space Entry task?</p> <p>All workers who could enter or work in a confined space, or other workers who are not required to enter the confined space but could carry out related functions ie standby or emergency procedures, and the Permit Receiver if supervising any of these workers. Training must be current within the past 3 years. The Permit Officer must also be trained to issue a Work Permit for confined space work.</p>
7	<p>Is there possibility of the standby sign in sign out register being attached to the confined space certificate? Similar to gas detection readings on hot works?</p> <p>Most organisations have their own templates. The WPCG will consider this next year. The WPCG can add this, but this may create some duplication if organisations need to follow their own too. Further consultation is needed on this.</p>
8	<p>The permit is the master document in the permit process, can we enforce the listing of all workers AND their role within that list area.</p> <p>All workers MUST be taken through the requirements of the Work Permit and are required to sign onto the Work Permit. Only individuals with dedicated roles under the permit such as spotters, stand by, fire watch are captured on the permit. Other roles will be documented on the contractor's relevant documents such as tool box talks, entry logs, SWMS etc.</p>
INDUCTION	
9	<p>Is the Retail Site Induction required across all WPCG members?</p> <p>Yes, Ampol, bp, Viva energy and Chevron require the Retail Site Induction</p>
10	<p>Who needs to complete the WPCG Retail Site Induction?</p> <p>All contractors performing work on WPCG Member operated sites are required to complete the induction. This includes co-workers or subcontractors performing work under a Work Clearance issued by a Work Clearance Issuer. WPCG Work Clearance Issuer you do not need to complete the induction.</p> <p>A delivery driver such as a driver delivering fencing or concrete does not require the Retail Site Induction so long as they are delivering only, not setting up the fencing. If the contractor has control of the site, they</p>

	should induct the site visitor, discuss the work fronts/ hazards and controls, Emergency Response plans / muster points and escort the visitor.
11	<p>Q. What are requirements for visitors to site who are company representatives (direct employees or consultants) who are not on site to perform work on the facilities, but are conducting inspections on contractors work and audits on contractors?</p> <p>A. WPCG Induction is required. Visitors will typically not need to follow the Work Authorisation process (ie Work Clearance or Work Permit) due to the level of risk provided they are at ground level and not performing maintenance, construction or other similar work activities. WPCG minimum PPE required.</p> <p>If the contractor has control of the site, they should induct the site visitor, discuss the work fronts/ hazards and controls, Emergency Response plans / muster points and escort the visitor.</p>
ACTIVITY MATRIX	
12	<p>As changes in technology how will WPCG allow contractors to use them within the facilities?</p> <p>This is something the WPCG will be reviewing next year. We need to comply with regulatory requirements on use of these devices in hazardous areas. The other issue is distraction when using these devices on the forecourt.</p>
13	<p>Could there be a minimum control, or checklist, or clearance form rules, for use of IT devices & other minor battery devices/tools like multimeters, to be on an approved list for use without gas tester?</p> <p>See question 12. At present as per the WPCG Activity matrix, when using battery operated equipment inside a hazardous area that is NOT certified for use in the hazardous a Minor Hot Work Minimum Control Checklist with gas testing is required.</p>
14	<p>In regard to tools and equipment (specifically test equipment) used by maintenance contractors can WPCG provide greater clarification and specific examples on the use within hazardous areas for contractor reference?</p> <p>As per the WPCG Activity Matrix, when using battery operated equipment inside a hazardous area that is NOT certified for use in the hazardous a Minor Hot Work Minimum Control Checklist with gas testing is required. The obligation is for contractors to demonstrate that their equipment is certified for the work area in accordance with AS600079. WPCG does not attempt to maintain a current list of third-party equipment and their certifications. If there is no evidence of certification, then it should be treated as uncertified.</p>
15	<p>Can I use diesel concrete cutter in a hazardous area using the Work Clearance Form and Minimum Controls Checklists?</p> <p>Yes, you require the Work Clearance Form with both the Ground Disturbance and Minor Hot Work Checklists and associated controls from all the forms in place. You are still required to do your risk assessment and have any controls for potential sparking in place. However, if you are satisfied there will not be continual sparking like there is with an angle grinder then the work is considered minor hot work inside a hazardous area. If there was continual sparking, or the concrete cutter was petrol driven, or not all controls on the Min Controls Checklist can be completed, then this would require a Work Permit and Permit Officer.</p>
16	<p>Does fusion welding inside a hazardous area require a permit?</p> <p>Fusion welding in a hazardous area does not require a Work Permit. However, it is important to note that the Minimum Controls Checklist for Minor Hot Work requires that no breaking containment can occur. As such only fusion welding of new pipework in hazardous areas of other fuel systems would be able to be conducted. Fusion welding on existing / live systems would require a Work Permit and Hot Work Certificate due to the greater potential for fuel vapours to be present in the area or pipework being fusion welded, and the additional precautions that may be necessary beyond those on the MCC.</p>
17	<p>Working at heights – need to define what is “minor maintenance”. If it is minor use checklist, is minor based on scope, or duration?</p> <p>As per the Minor Work At Height Checklist when working within 2m of an exposed edge minor maintenance includes preventative maintenance on HVACs, gutter cleans, roof leak detection, signage lighting and CCTV.</p>
Other Questions	
18	<p>Can a Function created to select all on WPCG permit/minimum controls to minimize time completing the WPCG when no permit/ minimum control is in place during works?</p> <p>This is not something being considered; the purpose of these statements/questions is for the person filling in the forms to read and acknowledge each one. This helps form part of their risk assessment.</p>
19	<p>If WPCG form Work Clearance or Work Permit is completed on sites, other than Ampol, bp, Viva energy or Chevron, why is it not accepted by WPCG?</p>

	Whoever engages you as a contractor or Permit Officer is responsible and liable for your activities on their sites and they need to ensure you have been adequately trained and safe systems of work (amongst other duties of care and regulatory requirements). The WPCG JV partners have no liability for implementation on non-JV partner sites. If other organisations want to become a WPCG partner, the WPCG would be happy to have the discussion.
20	Who needs to sign the Work Clearance form? Only the Work Clearance Issuer and the Site Operator (if on site) sign the Work Clearance form. Other workers will sign on to the contractors' relevant documents such as toolbox talks, SWMS etc.
21	There are some gas detectors that automatically test the gas levels during the bump test and a tick is populated if successful, is this sufficient for a bump test? This sounds like a functional test to confirm the device is operating rather than a bump test to confirm readings are accurate. Bump test involves connecting the gas detector to calibrated gas. If this process of "automatically testing" does not involved the introduction of a gas of known concentrations, then no this is not a bump test.
22	Can WPCG portal be used to store other training, high risk work licences & trade quals, all in one place? It's unlikely the WPCG database will be used for this purpose. Some companies already have systems in place, industry is starting put things in place, adding to the WPCG system would be duplicating effort and unlikely it would be kept up date. It is the responsibility of the contractors to maintain a record of any training completed by their employees.
23	Oil companies should provide clearer description (clarity) of roles and responsibilities, eg what can an permit officer do? Each of the WPCG roles are defined in the WPCG Work Authorisation Procedure which can be found in the resource tab of the WPCG Website. For example, the procedure clearly states, the self-issuing of Work Permits is not allowed. The Permit Officer must not work under a Work Permit they have issued. The only exception to this is if the Permit Officer is acting in a role dedicated to safety such as a standby / observer for a confined space, a fire watch, or spotter.
24	Need matrix that shows similarities between CI and receiver. While not a matrix each of the roles are defined in the WPCG Work Authorisation Procedure which can be found in the resource tab of the WPCG Website.
25	Program of WPCG Site Inspections. Locations, frequency? Each state is visited 1or 2 times a year with the inspections arranged directly with the Oil Companies or specific contractors or randomly while we are in that state. If you would like to be included in the program, please contact enquiries@wpcg.com.au