Permit to Work System

Contents

1. Purpose

The SkyCity PTW system is one of SkyCity's most critical controls. Its purpose is to:

- Provide adequate assessment and control of typically non-routine, higher-risk work activities that are performed at SkyCity
- Manage potentially conflicting work
- Protect the health and safety of SkyCity employees, contractors, operators, tenants, customers and visitors
- Protect the environment from adverse effects
- Protect SkyCity assets, operations and reputation

2. Scope

This System shall apply to all workers (contractors, employees, operators, tenants) at Sky City.

3. Responsibility

All persons involved in the permit-to-work system shall clearly understand and take an active role in meeting their responsibilities within this standard. This includes SCEG Leader, General Manager, People Leader, Employee and Supplier.

The following responsibilities specifically relate to all SCEG Business Departments that have responsibilities in permit-to-work activities and associated risks:

3.1. Chief Executive Officer / Chief Operating Officer (New Zealand – Australia)

Has overall accountability for the SkyCity PTW. They are responsible for:

a) Ensuring the PTW system is established, implemented, and maintained
b) Ensuring the system is adequately resourced

3.2. Group GM Health and Safety

Is responsible for the implementation of the system within SkyCity. They are responsible for:

a) Implementing and maintaining the PTW system
b) Ensuring the system is adequately resourced
c) Ensuring the system is audited in line with documented system requirements
d) Ensuring that training systems and outcomes meet the defined requirements
e) Must authorise any changes to the permit to work system

3.3. People Leaders (e.g., General Manager and Managers, Project Managers, For Capital Projects, Facilities, Property Services, Security and Procurement)

They are responsible for:

a) Ensuring the system is implemented and applied where required in areas under their control

3.4. Permit Issuer (SkyCity responsible manager)

Authorises the PTW and has the responsibility to monitor and enforce its application. They are given responsibility for the following:

a) Ensuring they understand the exact nature and location of the work to be undertaken
b) Participating in hazard/risk analysis and collaborating with subject matter experts to determine controls to be implemented
c) Confirming that permit user/s have been fully inducted
d) Issuing permits only after the work area has been verified as being safe to work on.
e) Ensuring WorkSafe NZ or SafeWork South Australia have been notified of any notifiable work
f) Participating in the auditing of work permits as defined in this system.
g) Revalidating permits at each shift changeover
h) Ensuring the hand back process is completed and the permit is properly closed.
i) Completing relevant training and ensuring it is kept up to date

3.5. Permit Receiver (Works supervisor)

Applies for the PTW and has the responsibility to apply the conditions set out in the permit. They are responsible for:

j) Must apply for the permit at least 7 days in advance of the high-risk work
k) Informing WorkSafe NZ or SafeWork South Australia of Notifiable work.
l) Carrying out hazard/risk analysis (JSA/SWMS as a minimum) for the work activity.
m) Consulting with permit issuer on appropriate controls
n) Ensuring all permit users are properly inducted.
o) Communicating permit requirements to all permit users prior to commencing work on site.
p) Following all permit conditions.
q) Regularly inspecting the work area.
r) Revalidating work permits at each shift handover.
s) Immediately notifying the permit issuer of any possible changes to the original permit conditions.
t) Ensuring the hand back process and permit closure are carried out correctly.

3.6. Permit Users

Carry out the work activity in accordance with PTW requirements.

3.7. 3.7. Safety Observer

Carries out their duties as required on the nature of the work activity. Safety observers must possess completed relevant competencies and training.

4. Work/Activities Requiring a PTW

The following work activities require a written PTW accompanied by the relevant Certificate/s as listed below.

Table 1: Permit to Work Activities

Permit activity	Description	Exclusions
Permit to Work	This is required for any of the work described in the table below (certificates relating to them will be attached to this permit). In addition to the below any Notifiable Work.	This permit is not to be used for work outside of SkyCity's control (e.g., work conducted by tenants that does not interface with SkyCity's infrastructure).
Hot work (Certificate)	Any work that involves a source or potential source of ignition. It covers gas cutting and welding; rotary disc cutting and grinding; soldering, paint stripping (hot air and flame gun), and any other operation that uses naked flames or produces sparks. It also includes the use of non-intrinsically safe or flameproof equipment in potentially flammable atmospheres.	Hot work done in a designated Hot Work area within a workshop. Use of handheld gas-powered torches within culinary environments for food production.
Work at height (Certificate)	Work at height exceeding 2m (measured from workers' feet). Work within 2 metres of an exposed edge with a risk of fall >2m. Work carried out from a "man cage". Erection of scaffold over 2m.	Work carried out from a certified scaffold. Certain work at heights may be verbally authorised based on the criteria outlined in **Table 2**.
Confined space entry (Certificate)	Examples include: Tanks; Silos; Bins; Pits and open tanks where heavier-than-air gases can accumulate.	None
Cranage (Certificate)	Lifting anything by mobile truck-mounted crane.	Simple unloading of materials from a vehicle using a Hiab or similar.
Excavation (Certificate)	Excavation includes any work which breaks the ground surface deeper than 300mm. It also includes penetrations through floors, walls, and ceilings (including the demolition of these).	Gardening activities, where digging is done with hand tools. Masonry fixings into concrete walls/slabs; picture hooks etc.
Pyrotechnics (Certificate)	Use of pyrotechnics within/in proximity to SkyCity premises	Cold spark machine (utilise hot works instead)
Hazardous material removal/disturbance (Certificate)	The removal of hazardous materials, including asbestos-containing material (ACM), or work within proximity to ACM which could result in disturbance.	

Electrical Isolations (Certificate)	Where isolating more than one breaker/switch or carrying out High Voltage work.	Standard single-point isolations.
System isolation	A permit or certification may be accompanied by a request for isolation of one or more essential building services such as: • Fire protection • Electrical • Gas • Water • Radiofrequency (RFR)	

4.1. Use of Verbal Authorisation

Verbal authorisation will be offered to catch lower-risk and routine work that otherwise may go unpermitted. Tasks eligible for verbal authorisation must be clearly defined, and management oversight is necessary.

Before proceeding with activities under verbal authorisation, a risk management discussion should be held with the SCEG People Leader authorising the work. Work conducted in this manner must adhere to the following criteria:

• Work must be of a routine and/or low-risk nature
• Must be completed in the current shift

The tasks detailed in **Table 2** can be performed with verbal authorisation from the SCEG People Leader and should be recorded in the onsite Authorized Access/Work Register.

Table 2: List of Activities that can be carried out outside the PTW system with a verbal authorisation

Work activity	Description	Requirements
Working At Heights	Work from an elevated working platform.	Operator competency/certification and lift certification must be confirmed by SCEG work supervisor Permit Issuer prior to issuing verbal authorisation
	Work on a roof with appropriately designed and installed edge protection.	Work must be carried out on/from properly designed and constructed walkways/work platforms.
	Roof access that only requires walking on purpose-designed walkways.	Must be always be escorted by a SCEG person
	Working from a certified scaffold	Workers must always remain with the confinement of guard rail systems.

	Routine work activities conducted by the SCEG in house rigging team	Work must be supervised and executed by a competent and qualified Rigging Supervisor.

Note: Where circumstances change and the level of risk is deemed high, SkyCity Management reserves the right to mandate the issuance of an official Permit to Work certificate to any supplier or contractor. In such cases, verbal authorisation will no longer be sufficient, as it is only applicable to low-risk, routine activities. Therefore, any work assessed as high-risk must be formally permitted to ensure full compliance with SkyCity's safety and operational standards.

5. Overview of the Permit to Work System

Define the Scope of Work

- Clearly identify the exact nature and extent of the work activity to be permitted.

Hazard/Risk Management

- The primary hazard management tool to be an indepth risk assessment. This is to be carried out for all permitted work and must be submitted by the Permit Receiver at the time of applying for a permit. It should reflect the scope of work and situation/environment at that time.
NB: Certain types of work are excluded from the Permit to Work system through verbal exclusion, as outlined in Table 2.

Consulation with Subject Matter Experts (SMEs)

- Engage SMEs in hazard and risk analysis procedures to ensure thorough assessment and efficient determination of control measures for implementation.

Prepare the Worksite

- Ensure the worksite and equipment is safe to work in or on. This includes all isolations and control of potentially conflicting work.

Check the Worksite

- An independent check of the worksite to ensure it is safe. This is to be undertaken by the Permit Issuer or their designate.

Issue Permit

- The PTW (and associated Certificate/s) are issued when it is authorised by the Permit Issuer and countersigned by the Permit Receiver. All the above activities must have been completed and confirmed prior to issuing the permit.

Monitor/Inspect the Permitted Work

- Periodic inspection of the work activity by the Permit Issuer or designate to ensure that permit conditions are being followed and that no new hazardous conditions have arisen. Inspection timeframes will be determined by the length of time and comlpexity of the permitted work activity.

Revalidate or Close The Permit

- The permit is closed on successful completion of the scope of work. If the permit spans a shift, a handover between the existing/new Permit Issuer and/or existing/new Permit Receiver must be completed. This requires the existing/new Permit Issuer to revalidate the work permit.

6. Permit Issuing Through DoneSafe

6.1. Permit Application and Issuing

Contractors and SCEG employees may apply for a permit, and associated certificates, using the DoneSafe platform. The permit receiver (work supervisor) will be required to provide details of the scope, hazards and controls to be implemented for the duration of the work. A permit issuer (e.g. SkyCity responsible manager) will be required to review the

request and complete further checks to ensure the work conforms to SkyCity's expectations. During this review stage, the permit issuer may request an SME to review the information provided before a permit may be issued.

Once a permit has been approved and issued in DoneSafe the permit receiver (e.g., the original work supervisor) who submitted the request will be required to accept and indicate the commencement of work in accordance with the previously agreed actions.

Following completion of the work, or expiry of the permit (or any isolations) the permit will be cancelled, and a new permit can be applied for within the system.

7. Permit Lifecycle and Rules

7.1. Permit Applications

The Permit Receiver is to notify the Permit Issuer at least **7 days** prior to the intended work start time. The Permit Issuer has the express right to refuse to issue a PTW.

NB: While permits typically require a 7-day advance application before work commencement, urgent or emergency requests will be considered.

7.2. Permit to Work Form and Risk Assessment Completion

The Permit Receiver shall complete the PTW form and Risk assessment for the proposed work activity. This will include certificates that are required due to the nature of the work activity.

7.3. Job Set-up

After receiving confirmation from the Permit Issuer that the work as described in the online submitted application can be carried out at the proposed time, the Permit Receiver and other Permit Users can set up on-site in preparation to start the job. Depending on location and sensitivity, this may require discussion with the Permit Issuer at the time. The work cannot, however, be started until the PTW has been authorised (signed) by the Permit Issuer. Once the permit has been issued to the Permit Receiver, the site will then become an area that they have the ability to influence and control and will remain so until the work has been safely completed and returned to the Permit Issuer.

7.4. Permit to Work Issue

1. The Permit Receiver will go through the PTW and associated certificates with the Permit Issuer on site.
2. The Permit Issuer will ensure that all the agreed-upon controls, as stipulated on the PTW and associated certificates, are met, or the mechanisms for meeting them are in place, prior to authorising a PTW.
3. The Permit Issuer will digitally sign (authorise) the PTW and the Permit Receiver will countersign it. The digital PTW will be retained online through SkyCity's Health and Safety Management System (HSMS), Donesafe.
4. N.B. Permits can be assigned for a future date only upon approval, sign-off, and closure of the designated work area. No changes to the work site are permitted until work commences.

5. The permit issuer will ensure a copy of the signed PTW, and associated certificates are available. This copy must be immediately available upon request either electronically at the location of the work or may be printed and kept at a visible location in proximity of the work, or at a designated permit display/contractor sign in point.

6. A permit must be signed off each day or shift change when permitted work is to be carried out.

7.5. Permit Life

The PTW will last for the time specified on the permit. This will be no longer than the number of times it is able to be revalidated. Once a PTW has reached its maximum number of revalidations, a new PTW must be issued.

7.6. Permit Suspension

The Permit to Work is regarded as being suspended in the following situations and must be revalidated before work can recommence:

1. Any emergency alarm/situation.
2. Following a serious incident.
3. A significant change in circumstances potentially impacting on the work activity.
4. If there is a shift change and the permit has not been revalidated at the time of the shift change.

7.7. Permit Revalidation

The Permit to Work must be revalidated at the following times:

1. At the shift change of either the Permit Issuer or Receiver.
2. At the start of a new of a new shift.
3. In every situation outlined above giving rise to suspension.

For permit revalidation, both the issuer (or delegate) and receiver must be present on-site, and the permit must be authorized by the issuer for renewal.

7.8. Permit Closure

The PTW will be closed off by the Permit Issuer when they are satisfied the following has occurred:

a) The site has been returned to a safe condition and all housekeeping requirements have been completed.
b) All isolations have been removed and plant/equipment returned to service.
c) All equipment has been removed where practicable.
d) All notifications have been made to potentially affected parties.
e) A thorough check of the work and the surrounding areas has been made to check for fire or other latent hazards.
f) The relevant insurance company has been notified that isolations have been lifted. Insurer (e.g., FM global) has received notification upon the reinstatement of Fire Protection Systems.

8. Training and Competency

Persons operating in PTW roles must be trained in the PTW system. The training must ensure that personnel can competently carry out the required activities as defined in the system.

Training in the PTW system alone will not provide the knowledge required to authorise and manage work activities. Permit signatories must be provided with training in related topics, such as hazard management, together with the necessary supervision and experience required of the process and the environment in which they work.

SkyCity requires that the following training is needed:

Responsible Person	Required Training	Additional Training Requirements Based on Scope of work and/or Location
People Leaders	• SkyCity PTW overview training	
Permit Issuers	• SkyCity PTW system/issuers training	
Subject Matter Experts (SMEs)		Competency based on certification, training, and/or experience.
Permit Receiver	• SkyCity Induction • SkyCity PTW system/receivers training • Accredited risk management training	**New Zealand**: • Confined space Entry (US17599) – if Confined Space certificate is needed • Work at Heights (NZQA) – if Work at Heights certificate is needed **Australia:** • Competency based on certification, training, and/or experience
Permit Users	• SkyCity Induction	**New Zealand**: • Confined space (NZQA) – if Confined Space certificate is needed • Work at Heights (NZQA) – if Work at Heights certificate is needed **Australia**: • Competency based on certification, training, and/or experience.
Gas Tester	• SkyCity Induction **New Zealand:** • Confined space entry and gas testing (NZQA) **Australia:** • **Competency based on certification, training, and/or experience.**	

Training records for training conducted with SCEG will be saved and held by SCEG for each individual undertaking such training.

Refresher training for Permit Issuers and Permit Receivers should take place every two years provided the candidate has been consistently participating in the PTW system for that period. If this is not the case, then retraining may be required at an earlier point. This will be at the discretion of the Group GM Health and Safety and the relevant SkyCity People Leaders.

The relevant people leader and permit receiver are responsible for ensuring that all individuals in their area of influence, undertaking defined roles in the PTW system, have been trained as described.

9. Monitoring and Review

The auditing of the PTW system shall occur on two levels:

Level 1 - Weekly operational monitoring by Permit Issuers or their designate. These observations will be conducted while the work is in progress, as applicable, utilising the checklist on Donesafe. Key areas to check include:

a) Has it been properly documented?
b) Is required safety equipment in place?
c) Have permit requirements been communicated to all users?
d) Does the actual work and permit scope match?
e) Is the work being carried out as required by the permit?
f) Are there adequate levels of supervision present on site?

Level 2 - Six monthly review by the Group GM Health and Safety and/or their designate. These reviews examine compliance with the overall Permit to Work permit system and to identify areas for improvement. The review shall randomly examine permits for the period and include a field audit (for a live permit). Corrective actions from the last review should be followed up. Key areas to check include:

a) Risk assessment to form part of a SWMS and JSA carried out adequately.
b) Permits authorised correctly.
c) Weekly monitoring carried out.
d) Persons signing permits have been trained.
e) Is sufficient equipment (gas tester, fall arrest) available and in good order?

10. Ring Fenced (Physically Isolated Projects)

Where a capital works project is conducted outside of Sky City buildings/facilities and physically isolated to both people and existing Sky City utilities/services and operations), the Main Contractor is regarded as having influence and control of the site and can apply their own PTW system.

10.1. Physically Isolated from People Within Sky City Facilities

Where a capital works project is carried out within Sky City buildings/facilities where Contractors and Suppliers are working at a site that they have the ability to influence and control; then the following applies:

1. If the project work site cannot be physically isolated, then the Sky City PTW will apply.
2. If the work site can be physically isolated from people, then the Main Contractor can apply their own PTW system for Work at Height, Excavation (although this will require a Sky City SME to confirm utilities identification), and hot work. The caveat to this is that the Main Contractors system must be of at least an equivalent standard to the Sky City PTW. Approval to use their system must be given to the Main Contractor by the People Leader (e.g., Project Manager) prior to the commencement of the work.
3. Regardless of the above and where PCBU overlapping occurs, PTWs relating to fire systems impairment, and data systems change will be issued by SCEG and remain principal as part of a contractor permit system in a defined closed area.

11. Records

Record type	Duration of retention	Method of Retention
Documentation relating to work activities (i.e., SWMS, JSA)	5 years	Electronic
PTW permit	5 years	Electronic
Certificates of competency and training	5 years	Electronic
Inspection and certification records	5 years	Electronic
Incident reports relating to HRW	5 years	Electronic

12. Related documents

- *HSMS Standard* - Supplier Management Standard
- *HSMS Standard* - Confined Space Critical Risk Standard
- *HSMS Standard* - Working at Heights Critical Risk Standard
- *HSMS Standard* - Electrical Works Standard
- *HSMS Standard* - Fire-Hot Works Standard
- *HSMS* – Prescribed Retention Times for HSMS Documentation

13. Change Log

Version	Date of Change	Authorised By	Amendment Details
1.0	29/04/2024	Paul Uttley – Group GM Health & Safety	- New document
1.1	29/12/2025	Paul Uttley – Group GM Health & Safety	- Clarification of limitations on the use of verbal permit authorisation - Updated related records

14.Appendix

14.1. Definitions

Phrase/Acronym	Meaning/Definition
Confined Space	An enclosed or partially enclosed space that is not intended or designed primarily for human occupancy, within which there is a risk of one or more of the following: a) An oxygen concentration outside the safe oxygen range. b) A concentration of airborne contaminants that may cause impairment, loss of consciousness or asphyxiation. c) A concentration of flammable airborne contaminant that may cause injury from fire and explosion. d) Engulfment that may cause suffocation or drowning. Confined spaces may be temporary (e.g. during repairs or excavations).
Cranes	For the purpose of the permit to work system refers to mobile cranes and fixed tower cranes. It excludes gantry and Hiab type cranes.
Excavation	Excavation includes all work, which breaks the ground surface deeper than 300mm. It also includes penetrations through floors, walls, ceilings (including the demolition of these). Excavation may be by hand or by mechanical means
Hot Work	Any work that involves a source or potential source of ignition. It covers gas cutting and welding; rotary disc cutting and grinding; soldering, paint stripping (hot air and flame gun), and any other operation that uses naked flames or produces sparks. It also includes the use of non-intrinsically safe or flame proof equipment in potentially flammable atmospheres.
Fire Systems Impairment Permit/Certificate	This is required for the impairment/isolation of emergency systems (alarms, sprinklers, and detectors).
Hazardous Materials	Any item or agent (biological, chemical, radiological, and/or physical) that can cause harm to humans, animals, or the environment. This could be a result of the material by itself or interaction with other materials.
Risk Assessment	Risk assessment tools such as JSA or SWMS that breaks down the work activity and identifies hazards/risks and their controls to be applied.
Notifiable Work	Work needing to be notified to the relevant regulator (i.e., SafeWork AU or WorkSafe NZ)
Safety Observer	Responsible for monitoring hazardous work, stopping work when a dangerous situation arises, and initiating rescue procedures if required. Safety observers are required for confined space entry at a minimum, but can also be required for cranage, excavation, and work at height.
Work at Heights	Any work where there is the risk of fall of two or more metres as measured from the worker's feet.
People Leader	An individual designated with supervisory responsibilities within SCEG, tasked with overseeing and managing personnel – this could include

	General Manager, Managers, Project Managers, For Capital Projects, Facilities, Property Services, Security and Procurement.
Permit Issuer	Issues the permit to work (PTW), authorising work to proceed in line with defined conditions
Permit Receiver	Person who applies for the permit to work (PTW) and is generally the person in charge of the place of work.
Permit User	Those carrying out the permitted work.
PTW	Permit to Work