

**Confined Space Entry
Audit Protocol**

Audit Information
Facility Name:
Date(s) of Audit:
Auditor's Name:
Period Under Review:

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A. Introduction

1. Review background information obtained from the facility to develop a general understanding of conditions or operations requiring confined space entry at the facility that may result in an accident, injury, or fatality.
2. Tour the facility to gain a general understanding of the areas of confined space entry.

B. Step 1: Understand Management Systems

***Note:** The purpose of Step 1: Understand Management Systems is to develop a detailed understanding of the facility's overall approach to managing its regulatory obligations. After completing this section of the protocol, the auditor should understand:*

- *How and why the facility has evaluated the applicability of existing regulatory standards to facility operations.*
- *Types of facility procedures that exist to implement compliance activities, and the general scope of such procedures.*
- *Methods used by the facility to assist in the implementation of compliance programs.*
- *Whether compliance management roles and responsibilities are clearly understood.*
- *Types of programs or activities engaged in to familiarise staff with confined space entry information.*
- *How the facility maintains and documents the effectiveness of its confined space entry program activities.*

C. Step 2: Assess Strengths and Weaknesses of Management Systems

***Note:** Once the auditor has developed an understanding of how the facility manages its confined space entry programme, the next step is to evaluate the soundness of these management and control systems in the context of the potential environmental, health, and safety impacts. The purpose of this assessment is to determine verification priorities for Step 3: Gather Audit Evidence activities. Spending the time to evaluate priorities will enable the auditor to maximize the effectiveness and efficiency for gathering the evidence needed to achieve the objectives of the audit.*

3. Determine the range of potential impacts if confined space entry activities are not managed appropriately.

4. Evaluate the management systems and controls to determine if they are designed soundly, i.e. consider if the systems, coupled with the control systems, are appropriate given the potential impacts.
5. Set verification priorities so as to provide the optimum allocation of available team resources to ensure that issues representing high risk and weak management/control systems receive sufficient attention. That is, complete the matrix provided in Table 1 that links the management systems assessment with potential impacts to determine your prioritization scheme.

Table 1: Determining Verification Priorities

Based on your understanding of the management system for confined space entry and the potential impacts if confined space entry activities are not managed appropriately put confined space entry in the appropriate box on the graph.

		Potential Impacts	
		Low	High
y a x i s	Weak	3	1
	Strong	4	2

x axis

D. Step 3: Gather Audit Evidence

Note: *The results of Step 2: Assess Strengths and Weaknesses of Management Systems activities (i.e., setting the verification priorities) provide the basic framework for the auditor to use in developing a sound and defensible verification strategy. Once the auditor has determined where the audit priorities lie for their protocol assignment(s), he/she develops a verification strategy based on available resources, what needs to be done, how to gather the information, where to apply verification testing, and what sampling strategies to employ. It is important to remember that the auditor develops this strategy in general to help ensure that the verification strategy is representative of the assessment made in Step 2: Assess Strengths and Weaknesses of Management Systems, and that the types of information gathered are appropriate for the protocol topics being examined. When gathering audit evidence, each auditor should ensure that the most appropriate type(s) of information will be representative and will be sufficient to verify compliance, as well as to substantiate noncompliance.*

Confined Space Entry Program

Note: *A permit-required confined space (permit space) means a confined space that has one or more of the following characteristics: (1) contains or has a potential to contain a hazardous atmosphere; (2) contains a material that has the potential for engulfing an entrant; (3) has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section; or (4) contains any other recognized serious safety or health hazard.*

6. Based on your understanding of the facility's management systems, confirm that the facility has evaluated the workplace to determine if any spaces are permit-required confined spaces.
7. Examine documents and interview key personnel to confirm that a written permit-required confined space entry program is established and functioning at the facility. Review the written program and confirm that the following key elements are included (place a check [√] on the line if the element is included):

___ Implementation of the measures necessary to prevent unauthorized entry (e.g., by posting danger signs ["DANGER—PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER"] or by any other equally effective means, to inform employees of the existence and location of and the danger posed by the permit spaces).

___ Identification and evaluation of the hazards of permit spaces before employees enter such areas.

- ___ Development and implementation of the means, procedures, and practices necessary for safe permit space entry operation.
 - ___ Performance of oxygen and explosive vapor monitoring prior to entering and during work in the confined space and employment of appropriate ventilation and/or breathing apparatus.
 - ___ Issuance of permit prior to work, which includes:
 - ___ Location and purpose of entry.
 - ___ Date and authorized duration of the entry permit.
 - ___ Names of the authorized entrants and the personnel serving as attendants and entry supervisors.
 - ___ Hazards of the permit space to be entered.
 - ___ Measures to isolate the space and control hazards.
 - ___ Acceptable entry conditions.
 - ___ Types of emergency services that can be summoned, and the means for such summons.
 - ___ Communication procedures employed during the confined space entry.
 - ___ Emergency and personal protective equipment.
 - ___ Any other safety-related information.
 - ___ Any additional related permits (i.e., hot work permits) that have been issued.
 - ___ Implementation of requirements for attendants outside the confined space and emergency rescue procedures.
 - ___ Documentation of the identification of the duties of authorized entrants, attendants, entry supervisors, or persons who test or monitor the atmosphere in a confined space.
8. Tour the facility to confirm that confined spaces requiring entry permits are identified by means of a sign or other equally effective means, stating the existence of the space, location, and danger posed by the permit space.

9. Determine if the facility has an internal rescue team. If so, through interviews with the rescue team members and a review of the rescue program and procedures, verify that (place a check [√] on the line if the element is included):
- ___ Rescue team members have been provided with the personal protective equipment (PPE) needed to conduct permit space rescues safely.
 - ___ Rescue team members have been trained in the use of that PPE.
 - ___ The rescue team has been trained to perform assigned duties.
 - ___ Rescue team members practice making permit space rescues at least once every 12 months.
10. If welding is performed in confined spaces, verify through inquiry and observation (if possible) compliance with safe work practices. (Use Table 2 to record your information.)

Table 2: Welding in Confined Spaces Checklist

Criteria	Yes	No/Describe Discrepancy	Location
Adequate ventilation is supplied to prevent accumulation of toxic materials or possible oxygen deficiency.			
Safety belts and lifelines are used when entering through a manhole or other small opening.			
Gas cylinders and welding machines are left outside and heavy portable equipment mounted on wheels is secured to prevent movement.			
A "watch" is stationed outside to observe the welder at all times.			
NIOSH approved airline respirators or hose masks are provided for work conducted in confined spaces that cannot be adequately ventilated.			
NIOSH approved hose masks with blowers or self-contained breathing equipment are utilized in areas immediately hazardous to life.			
The permit conditions in the confined space entry permit reflect welding activities.			

E. Step 4: Evaluate Audit Findings

11. Review actions taken to complete each step of the protocol. For each protocol step assigned, summarize your conclusions regarding the facility's compliance status. (Use Table 3 to summarize your opinion regarding the level of compliance being achieved.)
12. Review and discuss any unresolved compliance issues with appropriate facility personnel. Note explanations and disposition of such issues in the working papers.
13. Develop a written list of your exceptions and observations and use as a basis for discussion with other team members prior to the exit conference. As a team, evaluate the data used to substantiate the audit results and identify any patterns or trends in the results. In addition, evaluate your findings and observations based on the information gathered during Step 1: Understand Management Systems.
14. As a team, develop a complete list of exceptions and observations, which are clearly and concisely written and substantiated by audit data gathered.

F. Step 5: Report Audit Findings

15. Review all exceptions and observations with the facility environmental, health, and safety contact, and present them to facility management during the close-out meeting.

**Confined Space Entry
Audit Protocol
Table 3: Audit Opinion**

Develop an opinion as to the compliance status of the facility regarding confined space entry using the guidance provided below. Place a check (✓) in the most appropriate category or record N/A (not applicable). Document your opinion in your working papers.

Protocol Topic	Audit Opinion				
	Meets	Substantially Meets	Generally Meets	Requires Improvement to Meet	Requires Significant Improvement to Meet
Confined Space Entry Program					
Description of Audit Opinion Categories					
<p>Meets Governmental and Internal Requirements This opinion applies when, based on the audit team’s review, the facility is judged to be in compliance with all (or virtually all) of the applicable requirements included in the audit scope. For those very few requirements where isolated exceptions are noted, these departures are determined to be occasional and anomalous, and are considered to be inconsequential in comparison to the overall level of compliance achieved. It is intended for locations that are found to be in full compliance with applicable requirements.</p> <p>Substantially Meets Governmental and Internal Requirements This opinion is given when the audit results substantiate a high degree of compliance. It applies when, based on the audit team’s review, the facility is in compliance with most of the applicable requirements reviewed but only a few requirements were not satisfied. These departures are considered to represent isolated exceptions in an otherwise effective compliance program.</p> <p>Generally Meets Governmental and Internal Requirements Except as Noted This opinion applies when, based on the audit team’s review, several exceptions to applicable requirements are noted. These exceptions are more than isolated anomalies and reflect weaknesses in the design and/or implementation of compliance programs.</p> <p>Requires Improvement to Meet Governmental and Internal Requirements This opinion applies when, based on the audit team’s review, several exceptions to applicable requirements are noted and some of the exceptions reflect the absence of required programs, significant departures from established criteria, or lapses in program implementation.</p> <p>Requires Significant Improvement to Meet Governmental and Internal Requirements This opinion applies when, based on the audit team’s review, many exceptions to applicable requirements are noted, including several significant departures from established criteria, the absence of several required programs, or prolonged inattention to the resolution of previously identified compliance or liability issues.</p>					

