



Document Title:	Working in Confined Spaces Policy & Procedures
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1. Introduction

RHSU is committed to meeting its statutory obligations under the Health & Safety at Work Act 1974 and the Confined Spaces Regulations 1997. This policy sets out the responsibility of all line managers and provides guidance to the process and action that should be taken to ensure compliance.

RHSU acknowledges that serious health and safety risks may arise when entry into confined spaces is required. It is the intention of RHSU to ensure that any risks are reduced to as low as is reasonably practicable, and where possible entry to these spaces is avoided.

For the purposes of this policy a confined space will be defined as any space of an enclosed nature where there is a risk of death or serious injury from hazardous substances or dangerous conditions such as lack of oxygen or fire. Confined spaces may include:

- i. Underground cellars / rooms
- ii. Storage tanks / vessels
- iii. Enclosed drains / ducts
- iv. Unventilated / poorly ventilated rooms / spaces

It is not possible to provide a comprehensive list of confined spaces. Some spaces may become confined when work is being carried out, during construction or fabrication, and subsequent modification.

2. Risks Arising from Working in Confined Spaces

Confined spaces have the potential to hold hidden hazards, as well as the potential to amplify hazards which may occur as a consequence of their use or tasks being undertaken within them.

Dangers can arise in confined spaces because of:

- i. A lack of oxygen – this can occur where there is a reaction between substances and oxygen in the atmosphere, presence of another gas displacing normal air or inside a steel tank when rust is forming.
- ii. Toxic gas, fumes or vapours – this can build up in sewers and manholes (pits connected to systems), enter tanks or vessels via pipework and seep into trenches or pits in contaminated land.
- iii. Liquids and solids – these can suddenly fill the space, or release gases when disturbed, free flowing solids can solidify causing blockages which can collapse unexpectedly. Liquids and free flowing solids can move into low lying spaces.
- iv. Fire and explosions – this can be caused by flammable vapours or excess oxygen.
- v. Residue – this can be a source of noxious fumes, risk of slippage and potentially caustic
- vi. Dust – confined spaces have a potential higher concentration of dust which may impede breathing
- vii. Heat – confined spaces can be cooler / hotter than surrounding space, adversely impacting on core body temperature.

Some of the above conditions may already be present in the confined space, however some may arise through the task being carried out, or because of ineffective isolation of plant nearby or linked to the space. The confined space may also increase hazards arising from the task undertaken, where machinery is being used, solvents are employed or access restricted.

In view of the broad range of dangers and hazards identified a risk assessment will be required for all areas defined as confined spaces, and for all tasks undertaken within a confined space. Once

completed clear instruction and information given to staff whose roles / tasks involve their access to or work within confined spaces. For the majority it will involve situations such as access to beer cellars, access to crawl spaces or cleaning of catering equipment.

Risk assessments must be undertaken by a trained member of staff. For those departments in which more significant risks exist, comprehensive risk assessments will be required to identify how tasks are to be undertaken and the equipment, training and other elements necessary.

3. Employer Responsibilities

To achieve compliance with the Regulations, day-to-day responsibility is devolved to Heads of Departments and respective line managers. It is their responsibility to ensure the safe access to confined working spaces within their areas, to ensure that all tasks which involve confined working spaces are risk assessed and suitable information, training and PPE provided to all relevant staff and students.

RHSU is required to ensure that:

- i. Facilities are maintained, safe for use and free from harmful substances
- ii. Appropriate safe systems of work are implemented
- iii. Confined working spaces are regularly inspected, records maintained
- iv. Confined working spaces are used for appropriate storage, or specific requirements.
- v. Access to confined working spaces is controlled, delegated persons have received adequate information, instruction and training
- vi. Where compressed gas cylinders are in use a safety alarm system is installed which informs persons prior to entering the space of any hazard, and storage of cylinders is secure.
- vii. Compressed gas systems are regularly inspected, records maintained.

4. Line Management Responsibilities

Managers will take appropriate measures as are necessary to ensure that all work in confined spaces is planned, organised and undertaken by competent persons. These measures include, but are not exclusive:

- i. All confined working spaces identified and appropriate risk assessments completed
- ii. Ensure risk assessment takes account of the working conditions, location and equipment utilised
- iii. Where risk assessment identifies significant risk, access is restricted and any task undertaken will be completed by a professionally trained contractor.
 - a. Compliance with the RHUL Permit to Work system must be complied with in these circumstances
- iv. Where compressed gas cylinders are in use safety alarms are tested, records maintained, and cylinders stored securely

5. Employee's Responsibilities

All employees have a duty to take reasonable steps to ensure that they do not place themselves or others at risk of harm. They are also expected to co-operate fully in complying with any procedures that may be introduced as a measure to protect the safety and well-being of our staff and visitors.

It is the responsibility of all employees:

- i. to be aware of the potential risks in the area where they are working
- ii. to comply with instruction and follow safe working practices at all times
- iii. to ensure that PPE provided is used

6. Compressed Gas Systems

Compressed Gas systems are used by RHSU in all Licensed Trade Venues for the purpose of dispensing draught beverages, notably dispense of beers, lagers and ciders as well as carbonated soft drinks.

The compressed gas systems are professionally installed by the nominated suppliers, in respect of Draught beers, lagers and ciders this has been completed by InnServe on behalf of all national suppliers; and for carbonated soft drinks by CCE Ltd. The installations are certified, with annual maintenance schedules in place, and all reactive maintenance completed by their engineers.

Compressed Gas is delivered to RHSU venues by certified contractors, cylinders are delivered direct to designated storage areas by the contractors, sealed and secured in place. The cylinders can be moved by competent persons, the cylinders used are identified as 14lb units and the gas mixtures are identified on the cylinder. The systems use 3 types of compressed gas – CO₂ / Nitrogen mixed gases (60:40 / 70:30) and pure CO₂.

All locations which have compressed gas installations are fitted with a CO₂ alarm system which audibly informs persons prior to entering the location when there is a build-up of CO₂ in that location. These locations are defined as Confined Work Spaces:

- i. SU Venue – Beer Cellar is located in the basement level with indirect access at floor level to the outside environment
- ii. Medicine – Beer Cellar is located in the basement level with direct access at floor level to the outside environment
- iii. The Packhorse – Beer Cellar is located in the basement level, with direct access at ceiling level (via Dray Hatch) to the outside environment

A catastrophic leak in the compressed gas system can be identified by the audible alarm system informing persons of the excessive build-up of CO₂, and by the freezing of equipment caused by a rapid depressurization of the system.

7. Training

Managers must ensure that everyone who may access a confined work space or is required to undertake a task in a confined work space is competent to do so, having received suitable and sufficient information, instruction and training and while being trained, is supervised by a competent person.

8. Monitoring, Reporting and Record Keeping

Line Managers must ensure that records of all maintenance, testing and examination of equipment and systems are kept, including the date and action taken.

Line Managers must ensure that records are maintained for all training, with copies held at departmental level and centrally with HR.

The implementation of this Policy will be monitored at departmental level with any accidents, incidents or near misses being recorded and reported centrally.

