**Safe Work Requirement**

Permit to Work Procedure

Contents

[1. GENERAL 2](#_Toc53766364)

[1.1 INTRODUCTION 2](#_Toc53766366)

[1.2 PURPOSE 2](#_Toc53766367)

[1.3 OBJECTIVE 2](#_Toc53766368)

[1.4 SCOPE 2](#_Toc53766369)

[2. PROCEDURE 4](#_Toc53766370)

[3. ROLES AND RESPONSIBILITIES 5](#_Toc53766371)

[3.1 The Responsible Person 6](#_Toc53766374)

[3.2 General Manager 6](#_Toc53766375)

[3.3 Rig Manager 7](#_Toc53766376)

[3.4 Client Representative (Company Man) 8](#_Toc53766377)

[3.5 Permit Applicant-Person in Charge 8](#_Toc53766378)

[3.6 Permit Holder – Senior Person Assigned to the task 9](#_Toc53766379)

[3.7 HSE Supervisor 9](#_Toc53766380)

[3.8 The Fire Watch 10](#_Toc53766381)

[3.9 Crewmembers 10](#_Toc53766382)

[4. PERMIT CONTROL 11](#_Toc53766383)

[5. PERMIT OPERATION 12](#_Toc53766384)

[6. HOT WORK PERMIT 13](#_Toc53766385)

[7. COLD WORK PERMIT 14](#_Toc53766386)

[8. NO PERMIT REQUIRED 15](#_Toc53766387)

[9. SUPPLEMENTARY CERTIFICATES 16](#_Toc53766388)

[9.1 Isolation Certificate 16](#_Toc53766395)

[9.2 Entry Certificate 17](#_Toc53766396)

[10. PERMIT ADMINISTRATION 18](#_Toc53766397)

[11. RECORD RETENTION 19](#_Toc53766398)

[12. PTW AUDIT 20](#_Toc53766399)

[13. TRAINING 20](#_Toc53766400)

[14. Record 21](#_Toc53766401)

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| GENERAL    INTRODUCTION ECDC Permit to Work (PTW) system is a formal written document, which is used to control specific types of work. Correct use of this document ensures that all tasks performed are conducted in a controlled and approved manner.  All ECDC personnel, contractors and sub-contractors have specific responsibilities under this PTW system and are obliged to operate within the system parameters. It is important that all personnel are aware and understand theirs role, others person’s responsibilities, and are competent to perform the task assigned to them. PURPOSE The purpose of the Permit to Work system is to provide a formal system where the Rig Manager or Person in Charge (PIC) can monitor, control and administer work activities in a specific area through a Responsible Person, following a formal risk assessment. OBJECTIVE The Objective of this procedure is to ensure all work performed within the ECDC Operation with regards to the roles and responsibilities are controlled and to ensure safe systems of work are followed at all time. SCOPE The Permit to Work system shall be applied in the following cases:   1. **HOT WORK**, Work involving welding or the use of any flame or electric arc, or the use of any equipment likely to cause heat, flame or spark. It also includes caulking, chipping, drilling, riveting and any other heat producing operation, unless it is carried out in such a manner as to limit the temperature of the tools and work below 100° C. 2. Work at heights(including use of portable ladders, working on scaffoldings, carrying out maintenance on equipment involving use of hand operated lifting equipment like chain hoists, working with pressurized equipment like abrasive blasting equipment, airless spray equipment, etc, shall be covered by the Cold Work Permit. 3. Work requiring entry into a tank or confined space. Confined spaces include but are not limited to structural tanks, vessels, voids, storage tanks, mud pits, trip tanks, process vessels, sewers, ducts, manholes, pipelines, pits or which may contain toxic, corrosive, flammable or oxygen deficient atmospheres, any pit or excavation more than 1.5 meters deep. 4. The handling, use and storage of all equipment that is radioactive in nature and to the handling, use and storage of all containers used for the transport or storage of Radio-active sources. 5. Any equipment belonging to any party other than ECDC that is intended for installation or use, whether temporary or permanent, at the Site. 6. All cases where an employee is hoisted aloft on a man riding winch, man-lift or a crane certified for personnel lifts, using a riding belt or basket. It shall also apply to situations where an employee is lowered on a riding belt, using a man riding winch. 7. Activities which are outside the regular and normal operation of the Site. Maintenance and construction activities are considered as non-routine. Activities that are carried out on intervals exceeding six months shall be deemed to be non-routine activities. 8. Work on any pressurized systems or may cause uncontrolled or unintended released of hydrocarbon. 9. Work on any electrical or mechanical system requiring system isolation to ensure the safety of personnel. 10. Work on electrical equipment in hazardous areas to eliminate sources of ignition (Zone 0 & Zone 1). Any isolation work that is intended to be carried out on any equipment connected to energy sources. The energy sources may be mechanical, electrical, pneumatic, hydraulic etc. 11. All mechanical/ electrical isolation and de-isolation work. Whenever work is to be carried out on any mechanical or electrical equipment or equipment powered by electricity, a Permit should be issued indicating exactly what electrical supplies must be isolated or what isolation to mechanical equipment must be instituted to ensure that no possible source of injury to personnel exists. 12. Work on any of the rigs safety systems (i.e. firefighting, gas detection, safety valves etc.). 13. Work involving perforating or acidizing operations, radioactive sources, explosives or other dangerous sources. 14. Work involving the use of non-approved electrical equipment e.g. cameras, flashguns, radios, cell phones etc. 15. Work on /near moving equipment barriers and guards have to be bypassed. 16. Critical lifting and using of web slings. 17. Any work that does not clearly fit into one of the above categories and that in the judgment of the Company man/Rig manager requires a Permit to Work.  PROCEDURE Permit to Work procedures provides a method for supervisors and crewmembers to follow when undertaking certain types of tasks recognized to generate particular hazard to personnel or the facility. The PTW System also furnishes rig management a formal method to administratively coordinate and control work that may adversely impact other concurrent work, impair safety systems or otherwise endanger personnel and/or the facility.  On a practical level, the PTW System shall;   1. Limit the scope of the task. 2. Ensure supervisors and crew members follow procedures. 3. Ensure the crew are informed, heed necessary safety precautions and recognize the need to use required safety equipment. 4. Control the work within specified time limits. 5. Encourage pre-task planning, minimizing risk to personnel, process and equipment. 6. Reduce the inconvenience and interference to other operations. 7. Increase the awareness of personnel responsibility for the overall safety of the unit by providing documented details of potentially hazardous activities in progress. 8. Provide a continuous control and record of on-going work activities, detailing the nature of the work, required precautions/safeguards, and the responsible competent person in charge. 9. Ensure that upon completion of work, equipment and site are left in a safe condition. 10. Provide formal notification of completion of all work to the Rig manager  ROLES AND RESPONSIBILITIES All personnel with responsibilities under the ECDC Permit to Work System are required to complete a Permit to Work training course and test. Third parties are to ensure they are conversant with the procedure, abide to the ECDC PTW procedure and documentation.  The following personnel have specific duties within the ECDC Permit to Work system.   1. The Responsible Person is the Rig manger or Person in Charge. 2. The Permit Applicant is the respective Area Supervisor as designated by the RM/PIC. 3. The Permit Holder is the senior person assigned to the task at the work site. 4. Crewmembers are Individuals personnel assigned to the task and shall follow the stipulations set forth on the Permit(s).   The Rig Manager and Permit Applicant normally work a 12-hour shift. When off, the Alternate Responsible Person shall be the Night Toolpusher who shall administer the PTW system during this time. These individuals and their responsibilities are further defined below and have specific duties to perform.      The Responsible Person Shall ensure that:   1. All work requiring permits is identified. 2. Each permit contains a clear description of the work to be done, its location, start time and duration. 3. PTW activities that may interact or affect one another are clearly and effectively cross-referenced and managed. 4. All other work, which would create a hazard if undertaken at the same time, is made safe and suspended. 5. There are limitations on the time required and scope of the job is defined. 6. All persons involved in the preparation of permits, responsible for the supervision and performance of the job are identified. 7. Permits do not proceed beyond 12 hours or end of the Permit Holders tour, whichever occurs first, and any work continuing after a tour change is not resumed until new permits are issued.  General Manager The ECDC General Manager is responsible for implementing a safe system of work.   1. Responsible for the health, safety, environment and welfare of all personnel on the ECDC rigs and base camp location. 2. Ensure that written procedures and safe operating systems are in place and are complied with. 3. Provide enough resources for managing the PTW process e.g. training, competent persons and administration  Rig Manager The rig manager’s responsibilities as follows:   1. Manage, sign and administer the PTW System, including supplemental certificates. 2. Ensure participating personnel are aware of requirements and are competent to perform the work. 3. Oversee all on-going operations and planned activities to ensure conflicts are not caused by simultaneous activities. 4. Overall coordination and control of the PTW System and to approve all permits prior to the specified work commencement. 5. Designate Area Supervisors to be responsible for their respective work areas as Permit Applicants. 6. All hazards associated with the task have been identified. 7. The task description is clear, detailed and has been communicated to the workforce. 8. The rig site HSE Supervisor/Permit Applicant leader has checked the work site/task. 9. All steps necessary to ensure the safety of the site have been identified. 10. Sign the closure of the PTW that the work has been performed safely and the work site has been return to safe condition  Client Representative (Company Man)  1. Ensure all hazards associated with task have been identified and controls are in-place 2. The Client Representative is the final approval in the PTW application process. 3. Signs the PTW before the work commence and after completion of work  Permit Applicant-Person in Charge The Permit Applicant shall be the Area Supervisor as designated by the Rig Manager and they shall be responsible for the work being carried out in their area. A list of Supervisors designated, as “Area Supervisors” shall be displayed at the Permit Control Centre and only those Supervisors designated on the list shall be Permit Applicant. They shall ensure that:   1. All hazards associated with the proposed job have been identified. 2. All safety measures required for the job have been identified and review the JSA. 3. The work site is examined; the safety measures are in place, and remain in effect for the duration of the job. 4. The persons conducting the work are aware of the precautions to be taken, the safety equipment to be used, and the procedures to be applied during the period of the permit. 5. No work will commence until the Responsible Person has approved the permit in writing. 6. The work site is inspected prior to work commencing, at any time work is suspended or re-started, and on completion of the job to verify that it is left in a safe condition. 7. Before permit cancellation or closeout that all isolations required to be withdrawn are completed, and any associated systems are returned to normal operating condition. 8. The Rig Manager is notified of any suspension or the completion of the work and any other factors relevant to safety.  Permit Holder – Senior Person Assigned to the task The Permit Holder shall complete the permit(s) and associated supplementary certificates, and ensure that：   1. The operation of the PTW system and requirements of the permit are understood by all personnel associated with the permitted task and the applicable procedures are followed. 2. Any additional instruction or training is given to the work group to ensure understanding of the PTW system and procedures in general, and the specific precautions required for the work. 3. No work shall commence without the authorization and issue of the necessary permit in writing by the Responsible Person. 4. The conditions and precautions specified in the permit issued for the job are fully understood and adhered to. 5. When a job has been completed or suspended, the Responsible Person and Permit Applicant are informed and the permit is returned and/or signed off and the worksite is made safe.  HSE Supervisor The HSE Supervisor is responsible for:   1. Ensures that the PTW system is implemented according to the procedure. 2. Provides continuous support to ensure the PTW process is understood. 3. Reviewing risk & controls associated with activities requiring additional certificates 4. Maintains and updates the PTW log 5. Inspect job site with Permit Holder to ensure all requirement are met 6. Conducts gas test when required and records the result 7. Assist in supervising high risk jobs 8. Make sure the PTW forms & certificates are made available and that closed out PTW are documented in the PTW register.  The Fire Watch A qualified person designated to monitor the area of hot work involving welding or cutting, takes appropriate action to reduce the risk of fire and if necessary extinguish an incipient stage fire.   1. Have NO OTHER RESPONSIBILITIES that would interfere with his reliably fulfilling fire watch duties. 2. Maintain vigilance for changes in area or work conditions that may increase the chance for a fire or explosion and stopping work accordingly. 3. Have a charged water hose or fire extinguisher available and extinguish incipient fires that may start as the result of hot work being performed. The area must be kept wet/damp at all times if required by the permit.   When exposed combustibles (wood, paper, rags, dry grass, etc.) are present within 35 feet of the work area, fire watch can only leave the area after hot work has been stopped for thirty minutes or a relief attendant has been obtained Crewmembers  1. Ensure that they do not start work on any task requiring a PTW until a PTW has been issued and a toolbox talk is held. 2. Have a working knowledge of PTW system and the stop work process. 3. Ensure they have signed the TBT/PJSM or JSA documents before the work commences 4. Responsible for executing the task 5. Be under the authority of a Permit Holder before starting any work 6. Ensure that any safety instructions or safety measures under the PTW system are adhere to 7. Remembering, that they have the right to stop any unsafe work. 8. Make the job site safe after the task has been completed, by removing all tools and equipment used for the job.  PERMIT CONTROL  1. The PTW system requires the sequential transfer of authority starting and finishing with the Responsible Person. 2. All permits must be presented to the Responsible Person for approval prior to the commencement of any associated task. 3. At the completion of the permitted task the Responsible Person must be advised and will then close out the permit after ensuring the work site has been made safe. 4. Safety precautions and procedures shall be listed on the permit and must be put in place prior to conducting the task. 5. There shall be posted at the Permit Control Center a list of Supervisors designated by the Rig Manager as “Area Supervisors” to undertake the responsibility of Permit Applicant and be responsible for work being carried out within their area of supervision 6. The Permit Applicant will provide written instructions in order that the task can be carried out safely. 7. There shall be a formalized handover of equipment on site in a safe manner to the Permit Holder. 8. The Permit holder must be in control of the execution of the work within the specified time limits. 9. There shall be a formalized notification to the Responsible Person of the return to service of equipment and area under the permit after the task is completed. 10. The Issuing Authority shall also check and sign the cross-reference section, notify all “Affected Area Supervisors” and if there are no affected area supervisors the word/s “None” or “Not Applicable” are to be inserted. 11. The Permit Applicant and Permit Holder can not be the same individual in the execution of a Permit required task; the only exception to this is for an Electrical and/or Mechanical Isolation.  PERMIT OPERATION  1. The Permit Holder in consultation with the Permit Applicant shall Prepare the permit(s) and associated supplemental certificates. 2. The permit shall then be submitted to the Responsible Person for final approval and registration. A permit shall not be valid until the Responsible Person has approved it. 3. Personnel designated as the Permit Applicant or Permit Holder for a work permit will fulfil the same role / title on any related supplemental certificates. 4. Tasks identified under PTW system will be assigned to the following permit categories    1. Hot Work.    2. Cold Work.    3. No Permit Required. 5. Supplementary Certificates may be required before a PTW can be issued if specialist activities are to be performed in conjunction with a given task. These are separate from the Work Permit but are referenced on each document. These are the two categories of supplementary Certificates:   1. Isolation (Lockout/Tagout) .  2. Entry (Confined Space).   1. Permit checklists are also available to aid in permit preparation for specialised operations e.g. Perforating or Radioactive materials etc. 2. Copies of Hot & Cold Work Permits, Isolation & Entry Certificates and the above-mentioned checklists are available in the HSE Office. 3. The need to issue a Permit for any operation other than those listed can only be decided after careful consideration of the potential risks involved. Reference to applicable JSA’s shall be utilized.  HOT WORK PERMIT  1. A Hot Work Permit applies to any type of work which involves actual or potential sources of ignition and which is done in an area where there may be a risk of fire or explosion, or which involves the emission of toxic fumes or vapors from the application of heat. 2. The Hot Work Permit is only valid for the specific site listed and approved on the permit. The Hot Work Permit remains valid for a continuous period of up to 12 hours, or until the end of the Permit Holders tour, whichever comes first. 3. A new permit shall be issued at the end of the shift or after 12 hours, whichever comes first.. 4. There are 3 copies of each Hot Work Permit and are distributed to:   1st Copy: Permit Board,  2nd Copy: Permit Applicant (Dept. Head) and the  3rd Copy： Permit Holder to be displayed at the work site.   1. A flammable gas test must be carried out prior to issue of a Hot Work Permit for an area where the presence of gas is possible. 2. Continuous monitoring shall be conducted when carrying out Hot Work in confined spaces. 3. The results of this test and any subsequent tests shall be recorded on the Permit. 4. A Hot Work Permit is not required for operations involving permanently mounted plant using an enclosed flame such as boilers. 5. Work shall be stopped periodically to check for hot slags, fire or smoldering materials. 6. All flammable material shall be removed from the work site. 7. Additional person shall be used as fire watch through the duration of the work. 8. Ensure that the fire extinguishers or fire hose Is available at the work site   NOTE: Hot work not involving open flame or sparks may not require the designation of a fire watch COLD WORK PERMIT A Cold Work Permit is required for a task that does not involve hot work but has a high risk potential. The Cold Work Permit remains valid for a continuous period of up to 12 hours, or until the end of the Permit Holders tour, whichever comes first.  There are 3 copies of each Cold Work Permit and are distributed to:  1st Copy: Permit Board,  2nd Copy: Permit Applicant (Dept Head) the  3rd Copy：Permit Holder to be displayed at the work site.  A Cold Work Permit is required for specialized activities include but are not limited to the following:   1. Hydrostatic testing or pressure testing by other means of all piping and/or equipment. 2. Work on plant machinery e.g. agitators, mud pump, both drivers and driven, and/or vessels. 3. Opening of explosion proof or purged enclosures in classified areas. 4. Erection of scaffolding 5. Use of radioactive source for logging operation 6. Lift greater than 75% of crane SWL, complex or complicated loads and the use of multi-cranes, 7. Repair and Maintenance operation which compromise critical safety systems, critical equipment or which remove them from service e.g. fire and gas detection equipment, firefighting equipment etc. 8. Any other work the Issuing/Permit Applicant decides a Cold Work Permit is required 9. Use of Man riding 10. Use of 3rd Party and subcontractor Equipment or third party operation 11. Using of web slings, portable ladders and working at height tools. 12. Ground Disturbance.  NO PERMIT REQUIRED Many routine operations may be safely performed without the issue of a Permit to Work. The decision to use this facility is taken by the relevant Rig Manager/Department Head and/or in discussion with the relevant Area Supervisor if they are not one and the same, and must only be taken after consideration of the circumstances relating to the given operation.  The work must not be potentially hazardous to either the person who performed or to anyone else. The Rig Manager/Department Head must be satisfied that all reasonable practicable steps have been taken to ensure the safety of all. Examples of operations that may not require a permit include the following;   1. Routine drilling operations. 2. Routine materials handling. 3. Routine crane operations. 4. Routine Cold Work inside workshops and within accommodation units.  SUPPLEMENTARY CERTIFICATES For some operations it may be necessary to carry out a specific task, which requires instructions beyond those covered by the Permits to Work. For this purpose, Supplementary Certificates must be raised and cross-referenced on the relevant PTW. Supplementary Certificates are available in the following form:  A. Isolation or Lockout/Tag-out Certificate  B. Entry or Confined Space Certificate          Isolation Certificate Before a PTW is issued, it may be necessary to isolate the equipment or plant to be worked on.   1. The Isolation Certificate provides a means of documenting both electrical and mechanical isolations so that the task may be carried out safely. 2. The Permit Applicant and the Permit Holder should be a signatory to the isolation certificate. 3. The Permit Applicant and Permit Holder on the isolation certificate will be the same as the Permit Applicant and Permit Holder on the related work permit. 4. There are 3 copies of each Isolation Certificate and they are distributed as follows:   1st Copy: Permit Board,  2nd Copy: Permit Applicant (Dept Head) the  3rd Copy Permit Holder to be displayed at the work site.  Isolation of equipment may be for short-term periods of up to one tour for routine maintenance, or for extended periods of more than one tour for repairs or while waiting on replacement equipment or spares.   1. An Isolation Certificate is raised and logged for short-term isolations in the isolation log and the details added on the Active Isolation List displayed in the control room/permit issuing centre and then a PTW will be issued. 2. Both the Isolation Certificate and PTW shall then remain in force until the task has been completed and the equipment returned to a safe condition. 3. At this time both the Isolation Certificate and PTW shall be cancelled and all logs updated.   In the event it is necessary to isolate a piece of equipment for an extended period of more than one tour, the following procedure will be followed:   1. A permit will be raised and an isolation certificate completed. 2. A record of the isolation will be made in the Isolation Log and added on the Active Isolation List displayed in the control room/permit issuing center. 3. The equipment will be isolated, locked and tagged out. 4. When isolation of the equipment has been completed, all safeguards are in place and all associated work processes are completed (e.g. removal of equipment) the work permit may be cancelled. The isolation certificate and all safeguards will then remain in place.   When work/repairs have been completed on the isolated equipment, the following steps will be followed.   1. First a permit will be raised to cover the de-isolation process. 2. All lockout/tagout equipment will be removed following all safety procedures. 3. Once the equipment is back in service and all systems have been returned to a safe condition the Permit and Isolation Certificate will be cancelled.  Entry Certificate A Confined Space Entry Certificate shall be issued when it is necessary for personnel to enter any space with limited or restricted means for entry/exit and that is not designed for human continuous human occupancy. Confined spaces include, but are not limited to tanks, storage bins, manholes, pits, cellar, vessels, pipelines and other areas without adequate natural or forced ventilation.   1. An Entry Certificate must be issued when it is necessary for personnel to enter Confined Spaces. 2. The main purpose of the Entry Certificate is to certify that the atmospheric conditions in the space to be entered are acceptable and to document the necessary precautions. 3. The Entry Certificate is supplemental to the Permit to Work and does not allow for any confined space entry until a Permit to Work has been raised to address the safety issues. 4. A PTW must be raised before any task can be undertaken in a confined space, including visual inspection. 5. A Gas Test shall be performed with results recorded on the Certificate. 6. The Gas Test must be repeated after any interruption of the work. 7. Continuous gas testing using a portable or personal gas detector may be a certificate requirement. 8. The Entry Certificate is raised prior to the PTW being issued and shall remain in force until it and the PTW is cancelled.   There are three copies of each Entry Certificate and they are distributed as follows:  1st Copy: Permit Board,  2nd Copy: Permit Applicant (Dept Head) the  3rd Copy Permit Holder to be displayed at the work site. PERMIT ADMINISTRATION  1. All permits will be raised from a single designated issuing centre at the facility. 2. Once the Responsible Person has approved a permit, it shall be recorded in a Permit to Work Log maintained at the issuing centre. 3. One copy of the active permit will be displayed on an Active Permit Board located at the issuing centre and other copies of the permit will be distributed as per sections 6.0, 7.0, 9.1, 9.2 4. The Active Permit Board will be located in a prominent position within the issuing centre to allow relevant individuals to view open permits and cross reference information as necessary. 5. Permits will remain on the Active Permit Board until they are closed out at which time copies of the closed permit will be placed in a closed permit file and the Permit to Work Log updated. 6. It is the responsibility of the Permit Applicant to ensure that all permits are closed out in a timely manner on completion or postponement of the work.  RECORD RETENTION  1. All permits shall be recorded in a Permit to Work (PTW) Log that shall be maintained at the control room/permit-issuing centre. 2. The log shall contain the following details; the date the permit was raised, type of permit, person and department requesting the permit, brief description of the work to be carried out, area where work will be conducted, cross reference of Isolation or Entry Certificate number if applicable and the time and date the permit was closed out. 3. Copies of all closed out permits will be maintained at the facility for a period of 12 months, after which they may be destroyed. 4. Copy of Task Specific JSA is to be kept in a file with the Permit to Work as per Policy. 5. Monitoring the effectiveness of the Permit System shall be verified by conducting spot checks and inspections. 6. Spot Checks will be conducted by the Rig Manager or Alternate Responsible Person and by the Issuing Authority to ensure that tasks for which a Permit has been issued are being undertaken in the manner described in the Permit. 7. The Rig Manager shall review aspects of the PTW System and conduct spot checks of active permits during his regular rig inspections. 8. All supervisory staff are also encouraged to conduct spot checks of open permits whether associated with their department or other departments to aid in verification of the system.  PTW AUDIT Senior ECDC Management and the client representatives will undertake periodic auditing of the PTW system. On completion of the audit, the observations are to be communicated to the Rig manager and concerned departments. The ECDC PTW system including all its associated documentations shall be audited annually. Updates and changes should be reflected using the Management Of Change procedure. The client well team management and HSE department should be notified of any changes to the PTW system. A review of the PTW System shall be undertaken as part of the MS Internal Audit process TRAINING Training of all personnel, including 3rd parties shall be undertaken for any individuals performing tasks governed under the company’s PTW System. All personnel are required to undertake PTW training. A record of such training shall be maintained under the administration of the Rig Manager. In the event any individual requires additional training in the PTW system, it is the responsibility of the Rig Manager to ensure adequate training is provided. Record 14.1 BSA-ECDC-HS-CL-S001-01-Work Permit v1.0  14.2BSA- ECDC -HS-CL-S001-02-Isolation Certificate v1.0  14.3BSA- ECDC -HS-CL-S001-03-Entry Certificate v1.0  14.4BSA- ECDC -HS-CL-S001-04-PTW\_Register v1.0 |