

Complex Isolation

(Energy Tag and Lockout)

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NOTE – Seqwater have updated their processes and procedures that support Energy Tag and Lockout. This procedure is part of the suite of documents that replace the Energy Tag and Lockout Procedure (PRO-00014).

This new procedure takes effect from 2 November 2026.

Contents

1.	Purpose	3
2.	Scope	3
3.	Isolation Critical Controls	3
4.	Complex Isolation Risk Controls.....	4
4.1.	Roles – Complex Isolations	4
4.2.	Isolation documentation and permits.....	4
4.3.	Lock types and lock board / lock boxes	5
5.	Complex Isolation Process – Isolation Steps	5
6.	Definitions	12
7.	Roles and Responsibilities	13
8.	Training and Competency.....	14
9.	References and Related Materials	14

Version No.	Document No.	Document Owner:	Approval Date:	Document Approver:	Page:
1	PRO-02657	Principal WHS Risk & Systems - P8320	28/09/2026	Head of Workplace Health & Safety - P6061	2 of 14

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1. Purpose

The purpose of this Procedure is to describe how to safely plan, implement, verify, maintain and release Complex Isolations of hazardous energy at Seqwater sites, using the Ten Isolation Control Steps.

This Procedure must be read together with the Energy Tag and Lockout Standard ([BST-00004](#)). Where there is any inconsistency, the Standard takes precedence.

2. Scope

This Procedure applies to all employees and contractors performing complex isolations on Seqwater's assets. High Voltage (HV) isolations and Network isolations are out of scope and must follow the relevant Seqwater electrical or network procedures.

This Standard does not apply to Principal Contractors (PCs) however, they must still:

- follow Seqwater's Minimum Health, Safety and Environmental Requirements ([GDE-00368](#))
- meet or exceed the isolation standards established by this document and the controls established in Seqwater's Critical Controls Handbook ([MAN-00313](#))
- verify their processes are compatible with Seqwater's lock colours and interfaces to site permits and access controls.
- Principal Contactor isolation processes must be confirmed during the contractor engagement, pre-start planning processes and Project Works Permit ([ERM-00777](#)) development. Refer to Seqwater's Contractor Management Procedure (HSW, Env & DWQ) ([PRO-00808](#)) for further information.

3. Isolation Critical Controls

There are three critical controls relevant to Complex Isolations:

1. Isolation of energy sources (excluding electrical)
2. Isolation of all low voltage electrical sources of energy
3. Isolation of all high voltage electrical sources

Refer to the Energy Tag and Lockout Standard ([BST-00004](#)) for details of the performance standards for each of these controls. Key aspects of these performance standards have been included in the Complex Isolation Process outlined in section 5.

Version No.	Document No.	Document Owner:	Approval Date:	Document Approver:	Page:
1	PRO-02657	Principal WHS Risk & Systems - P8320	28/09/2026	Head of Workplace Health & Safety - P6061	3 of 14

4. Complex Isolation Risk Controls

4.1. Roles – Complex Isolations

See Section 6 for detailed responsibilities of each role.

Authorised Isolator	Sets the isolation strategy, confirms minimum isolation category for each energy source, and approves the Isolation Permit (which contains the Isolation Instruction).
Isolation Officer	Performs the physical isolation and verification in the field as per the Isolation Permit. Where the work is electrical work or work on/near electrical equipment, isolation and proving must be performed by an Electrical Worker who also holds the relevant LOTO competency.
Isolation Permit Issuer	Controls the lock board / lock box for the complex isolation, ensures all ten control steps are followed, and verifies isolation effectiveness at key hold points. Issues the Isolation Permit through the application of their black lock.
Isolation Permit Recipient	Leads the work party and is responsible for isolation planning with the Authorised Isolator and work sequencing. Receives the Isolation Permit through the application of their green lock.
Access Officer / Duty Operator	Manages site access, plant operating status, and coordination of concurrent work (via PASS where applicable).
Workers / Contractors	Follow the isolation controls, apply personal locks, verify the isolation and comply with SWMS and permits.

4.2. Isolation documentation and permits

Complex isolations must be documented on an Isolation Permit ([TEM-00077](#)). This document:

- records all isolation steps and energy sources
- identifies the minimum isolation category for each energy source as per the Minimum Isolation Standards in Energy Tag and Lockout Standard ([BST-00004](#))
- defines the test for dead / prove for dead method
- includes hold points and communication steps
- records verification results and residual risk rating
- records any variance from the minimum isolation standards and the approval level, in line with [FRA-00014](#) Enterprise Risk Management Framework.
- For any High Voltage Electrical Isolation, [PRO-00006](#) Electrical – High and Low Voltage Procedure, remains the controlling electrical safety document; [TEM-00077](#) may only operate as an overlay for non-electrical / coordination / parent-child lock-board management where explicitly authorised.

Where required a Major Works Permit ([FRM-00778](#)) must also be in place in accordance with Permit Access Safety System (PASS) Procedure ([PRO-01820](#)). This procedure does not duplicate PASS mechanics; it defines how isolations are planned and executed once a permit triggers the need.

Version No.	Document No.	Document Owner:	Approval Date:	Document Approver:	Page:
1	PRO-02657	Principal WHS Risk & Systems - P8320	28/09/2026	Head of Workplace Health & Safety - P6061	4 of 14

4.3. Lock types and lock board / lock boxes

Complex isolations must use lock board / lock boxes. The standard Seqwater lock colours are:

- **Red** – Personal safety lock (each worker).
- **Orange** – Equipment isolation lock (on isolation points).
- **Black** – Isolation Permit Issuer (controls the lock board / lock box and isolation keys).
- **Green** – Isolation Permit Recipient (work party lead for that complex isolation).

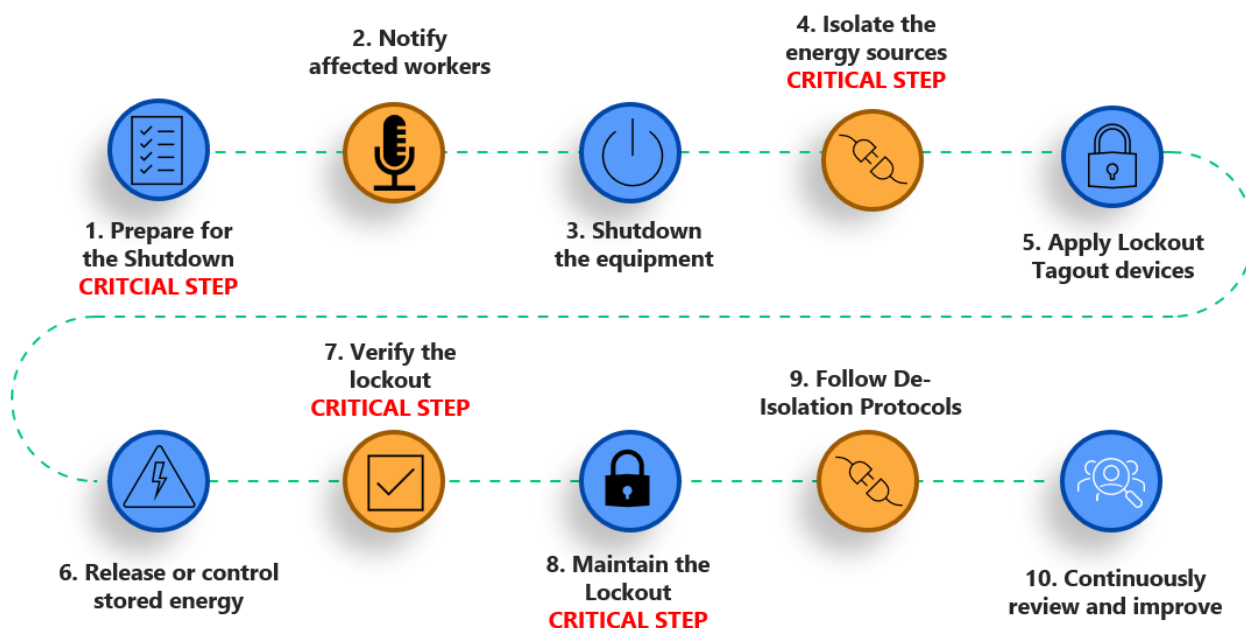
Lock boards / lock boxes must:

- securely hold all keys to orange equipment isolation locks for that isolation
- have space for Isolation Permit Issuer and Isolation Permit Recipient locks plus all personal red locks
- be stored in a secure, dry and visible location agreed during planning (often control room or local plant location).
-
- Note: Out of Service (OOS) locks (**Yellow**) – are only used when an item of plant is removed from service and not under an active isolation. They are not used as an isolation lock.

5. Complex Isolation Process – Isolation Steps

Review the [Complex Isolation Animation](#) to see how the Ten Isolation Steps are applied to Complex Isolations.

All lock out tag out activities must follow the 10 Isolation Steps established by the Energy Tag and Lockout Standard ([BST-00004](#)). Critical steps (strongest controls, highest assurance) are marked **CRITICAL STEP**. They cover planning, isolating, verifying and maintaining the Lockout.



Version No.	Document No.	Document Owner:	Approval Date:	Document Approver:	Page:
1	PRO-02657	Principal WHS Risk & Systems - P8320	28/09/2026	Head of Workplace Health & Safety - P6061	5 of 14

Control Step 1 – Prepare for the Shutdown

CRITICAL STEP

The Authorised Isolator, with support from the Isolation Officer and Isolation Permit Recipient, must plan each complex isolation so that:

1. Hazards and risks are identified using Hazard Identification and Risk Management Procedure ([PRO-00657](#)).
2. The correct type of isolation is selected (simple, complex, tiered, HV, network). This Procedure applies once the task is confirmed as a complex isolation.
3. All energy sources are identified using drawings, P&IDs, site inspection and input from operations and trades.
4. The minimum isolation category is determined for each energy source and work type, using the Minimum Isolation Standards and confined space isolation requirements where applicable.
5. An Isolation Permit is drafted that include all information specified in section 4.2.
6. Interactions with other permits (e.g. confined space entry, hot work, working at height) are identified and aligned.
7. Resourcing is confirmed – competent Isolation Officer(s), Isolation Permit Issuer, Isolation Permit Recipient, isolation equipment, access to plant labels and drawings.
8. Where minimum isolation standards cannot be met for Non-electrical isolations (relating mechanical and process work), or Confined Space Isolations standards cannot be met, a WHS Management System Deviation Approval Form is prepared supported by a written risk assessment explaining:
 - a. why Category 1 or 2 isolation is not reasonably practicable
 - b. the proposed alternative method
 - c. how equivalent safety will be achieved (compensatory controls).
 - d. the identified Managed Risk Level with compensatory controls in place.

Compensatory controls within the risk assessment may include:

- a. upstream isolations.
- b. Energex isolations.
- c. continuous gas monitoring and alarms.
- d. additional temporary blinds downstream.
- e. mechanical inhibition of auto-start systems.
- f. isolation watchers and additional supervision.
- g. Plant shutdown.
9. The outcome of the Deviation request is attached to the isolation Permit, and the deviation ID recorded in Section 1 of the Isolation Permit.

Output of Step 1: a reviewed and Authorised Isolator approved Isolation Permit, ready for field implementation.

Control Step 2 – Notify Affected Employees

Before isolations commence, the Isolation Permit Recipient (or delegate) must:

- notify the Isolation Permit Issuer that the work team are ready for the isolation to commence
- notify affected work groups, including Principal Contractors and stakeholders on site, that the isolation is due to start

Version No.	Document No.	Document Owner:	Approval Date:	Document Approver:	Page:
1	PRO-02657	Principal WHS Risk & Systems - P8320	28/09/2026	Head of Workplace Health & Safety - P6061	6 of 14

- confirm any required permits (PASS and others) are active before isolations start.
- The Isolation Permit Issuer will:
- notify Access Officer / Duty Operator that the isolation will commence, the isolation scope and planned start and finish times
- agree on the plant operating status and any constraints (e.g. supply, environmental, customer impacts)

Notifications and agreements are recorded on the Isolation Permit and, where relevant, in PASS.

Control Step 3 – Shut Down the Equipment

The Isolation Officer shuts down the plant in a controlled manner in accordance with operations procedures and the Isolation Instruction. This may include:

- stopping pumps, drives and process equipment
- ramping down flows to minimise surge
- placing controls in the defined safe condition (e.g. local/remote, manual/auto)
- confirming alarms and control systems are set to support the isolation (e.g. disabling auto-starts where authorised).

Plant must not be shut down in a way that introduces new or uncontrolled risks (e.g. water hammer, chemical mixing, overflows).

Control Step 4 – Isolate the Energy Sources

CRITICAL STEP

This step implements the minimum isolation standards. For each energy source the Isolation Officer:

1. Isolate each energy source as per the isolation instructions within the isolation permit ensuring the method meets the minimum requirements for the isolation type and work type:

A. Electrical Energy Isolation for Non-Electrical Work:

Apply Category 1 as preferred, or Category 2 electrical isolations if required, to remove motive power from the plant being worked on. Ensure the isolation points selected can be secured and functionally verified that the motive power has been isolated.

If Category 1 or 2 isolations cannot be implemented for non-electrical work, the isolation task must be escalated to an Authorised Isolator who is an Electrical Worker and be treated as electrical work.

B. Electrical Energy Isolation for Electrical Work:

Apply Category 1 as preferred, or Category 2 electrical isolations if required, to de-energise the plant. Ensure the isolation points selected can be secured and be subjected to an approved test-for-dead method to verify de-energisation.

If Category 1 or 2 isolations for electrical work cannot be implemented, treat it as energised work and follow requirements specified in [PRO-00006](#) Electrical – High and Low Voltage Procedure. Category 3 isolations for electrical work are not permitted.

Note: Where the work is electrical work or work on/near electrical equipment, isolation and proving must be performed by an Electrical Worker who also holds the relevant LOTO competency.

Version No.	Document No.	Document Owner:	Approval Date:	Document Approver:	Page:
1	PRO-02657	Principal WHS Risk & Systems - P8320	28/09/2026	Head of Workplace Health & Safety - P6061	7 of 14

C. Non-Electrical Isolations for Mechanical and Process Work

Apply Category 1 non-electrical isolations as preferred, or Category 2 non-electrical isolations if required, to prevent exposure to the hazardous energy. Ensure the isolation points selected can be secured and be subjected to functional verification suitable to the hazardous energy (e.g. Mechanical, Hydraulic, Pneumatic, Gravity, Thermal and or Chemical energy).

If Category 1 or 2 isolations for mechanical and process work cannot be implemented, the Authorised Isolator must follow the deviation pathway outlined in Control Step 1 (part 8).

D. Confined space isolations:

Apply Category 1 – Positive Isolation on every line that could introduce hazardous substances or energy into the space by default.

Where Category 1 – Positive Isolations cannot be implemented due to plant infrastructure limitations, the minimum isolation standard is double block and bleed proven isolation with continuous monitoring and zero pressure verification at the bleed clearly documented and approved via the Isolation Permit.

Where the minimum double block and bleed proven isolation cannot be implemented, the Authorised Isolator must follow the deviation pathway outlined in Control Step 1 (part 8).

2. Ensures all isolation devices are fit for purpose and can be locked out (valve lockouts, shrouds, hasps etc.).
3. Ensures SCADA, control circuits or emergency stops are not used as the primary method of isolation. They may be used as additional controls only.

If any isolation step behaves unexpectedly (back feed, residual pressure, alarms), the Isolation Officer must stop, make safe and consult the Authorised Isolator and Isolation Permit Recipient, revising the Isolation Permit before proceeding.

Control Step 5 – Apply Lockout and Tag Devices

Once isolation devices are in the correct position, the Isolation Officer must:

1. Attach an orange equipment isolation lock and isolation tag to every isolation point.
2. Ensure each tag clearly states:
 - isolation ID / step number
 - plant/equipment
 - person who applied the lock
 - contact details
 - date/time.
 - Where an isolation cannot initially be secured, the isolation lockout work should be escalated by the Isolation Officer to the Authorised Isolator, Permit Issuer, or to their Supervisor. If a non-electrical isolation still cannot be secured after this escalation, the variation pathway in Control Step 1 (part 8) should be followed. If an electrical isolation still cannot be secured after initial escalation, the isolation should not proceed until a securable isolation point upstream can be implemented.

Version No.	Document No.	Document Owner:	Approval Date:	Document Approver:	Page:
1	PRO-02657	Principal WHS Risk & Systems - P8320	28/09/2026	Head of Workplace Health & Safety - P6061	8 of 14

3. Place all keys for orange equipment isolation locks into the dedicated lock board / lock box.

Control Step 6 – Release or Control Stored Energy

The Isolation Officer must control all stored and potential energy sources in line with the Isolation Instruction on the Isolation Permit, including:

- discharging pressure from vessels, lines and accumulators
- draining, venting, or depressurising process lines to zero gauge pressure
- securing or lowering suspended or moving parts (e.g. counterweights, rams, gates, penstocks)
- removing mechanical drives or couplings where required (e.g. key removal, shaft separation)
- earthing and discharging capacitors and batteries (in consultation with competent electrical personnel)
- ensuring auto-start functions, back feeds and UPS/VFD regeneration paths are disabled or otherwise controlled.

Risks arising from the release of stored energy (noise, spray, discharge to environment) must be controlled and recorded in the risk assessment and Isolation Permit.

No work is to commence until Steps 4, 5 and 6 have been completed and documented.

Control Step 7 – Verify the Lockout

CRITICAL STEP

Verification (“test for dead / prove for dead”) is critical and must be sceptical and evidence based.

The Isolation Officer must verify that:

- all isolation points are correctly positioned and locked
- stored energy has been dissipated or effectively restrained
- attempts to start the plant or introduce flow/pressure are unsuccessful.

Individual verification of each isolated energy source must follow the minimum requirements specified for the energy type and work type:

A. Electrical Energy Isolation for Non Electrical Work:

Apply a functional verification test to ensure all motive power has been removed. Try-start testing should be performed for each start mode available for the plant (local, remote, auto starts). Ensure the isolation point is appropriately secured during the functional verification test.

B. Electrical Energy Isolation for Electrical Work:

Ensure a competent person (Electrical worker) applies an approved test-for-dead (live-dead-live) method to verify the plant has been de-energised.

C. Non-Electrical Isolations for Mechanical and Process Work

Apply a functional verification test to ensure the specific hazardous energy exposure is removed. For valving isolating hydraulic, pneumatic or chemical energy, functional verification is proven via a bleed between the live system and equipment which is being isolated.

Version No.	Document No.	Document Owner:	Approval Date:	Document Approver:	Page:
1	PRO-02657	Principal WHS Risk & Systems - P8320	28/09/2026	Head of Workplace Health & Safety - P6061	9 of 14

The Isolation Officer records verification steps and results on the Isolation Permit (including readings, photos or other evidence where practical). These verification steps can later be observed on the Isolation permit and confirmed in the field by any individual worker working under the isolation permit.

Control Step 8 – Maintain the Lockout

CRITICAL STEP

Maintaining the lockout ensures that a safe zero-energy state is preserved for the entire duration of the work. For complex isolations:

- Lock board / lock box control
 - Once verification is complete, the Isolation Officer ensures all keys to orange isolation locks are secured in the lock board / lock box.
 - The Isolation Permit Issuer Lock (Black) is only applied when the isolation instructions within the permit (Section 2) and isolation proving procedures (Section 3, 3a) are completed, and it is safe for the work to begin. The black lock ID number is recorded on the permit.
 - Isolation Permit Recipient Lock (Green) is only applied after a Permit Issuer Lock is placed on the lock board, and the Isolation Permit Recipient is satisfied the completed isolation permit allows the workgroup to complete their scope of work safely.
- Personal locks
 - Every worker exposed to complex isolations must apply their red personal lock onto the lock board controlling that isolation only after a Permit Issuer Black Lock and Permit Recipient Green Lock have been applied and the permit recipient has communicated it is safe to do so.
 - Workers remove their red lock and sign off the Isolation Permit whenever they leave site or cease working on the isolated plant.
- Break in work (> one shift) - Where the work cannot be completed in a single shift, but the plant must remain isolated:
 - All orange equipment isolation locks and tags remain in place.
 - Workers remove their red locks and sign off before leaving.
 - The Isolation Permit Recipient confirms:
 - work status
 - condition of plant and work area
 - that all workers are clear of the plant.
 - The Isolation Permit Recipient may remove their green lock once satisfied that work has ceased and the plant will remain isolated.
 - The Isolation Permit Issuer leaves their black lock in place on the lock board / lock box. Because the black lock secures all keys to the isolation locks within the lock board / lock box, it is the primary control that prevents reenergisation during the break in work.
 - The lock board / lock box and associated documentation are stored in a secure location (e.g. control room or secure plant room) agreed with the Access Officer.
- Continuous Shift handover:
 - All outgoing workers remove their red personal locks after confirming the job site is clear.
 - If the permit recipient remains the same for the next continuous shift they leave their permit recipient lock on the lock board, and perform the handover with the incoming shift

Version No.	Document No.	Document Owner:	Approval Date:	Document Approver:	Page:
1	PRO-02657	Principal WHS Risk & Systems - P8320	28/09/2026	Head of Workplace Health & Safety - P6061	10 of 14

Out of Service locks are not used as the primary control to manage break in work for complex isolations. Yellow OOS locks are reserved for equipment that is out of service but not under an active Isolation Permit.

- Resuming work after break in or shift change - Before work resumes:
 - The new Isolation Permit Recipient (or returning Isolation Permit Recipient) reviews the Permit, risk assessment and any other permits.
 - The Isolation Permit Recipient and Isolation Officer jointly inspect the plant and work area for changes (conditions, operations, other work, weather).
 - The Isolation Officer re-verifies critical isolation points if there is any doubt or if required by the Minimum Isolation Standards (e.g. after a major rainfall event, operations intervention, or long break).
 - The Isolation Permit Recipient applies their green lock to the lock board / lock box.
 - Each worker applies their red personal lock and signs back on before commencing work.
- Forced lock removal
 - If a worker has left site without removing their red lock and the plant must be returned to service, the Forced Lock Removal Form ([FRM-00424](#)) must be used.

Control Step 9 – Follow De-Isolation Protocols

When work is complete or when the plant must be partially reinstated for testing, the following must occur:

1. Confirm work completion – The Isolation Permit Recipient confirms that:
 - the defined work is complete or at a safe pause point
 - all mandatory testing has been completed i.e. pressure testing, electrical mandatory tests
 - all tools, equipment and waste are removed
 - guards and protection devices are re-installed
 - other permits (e.g. confined space) are closed or in a safe state.
2. Workers remove personal locks – All workers remove their red locks and sign off. The Isolation Permit Recipient removes their green lock after confirming that the above checks are complete.
3. Inch and Test (if required):
 - Where the plant must be energised for testing before final reinstatement, the Isolation Officer and Isolation Permit Recipient follow the Inch and Test requirements recorded in the Isolation Permit.
 - All personal red locks are removed before inch / test.
 - After testing, isolations are fully reinstated, locks returned to the lock board / lock box, and workers re-attach red locks if more work is required.
4. De-isolation and return to service – When the plant is ready to return to service:
 - The Isolation Officer confirms with the Access Officer / Duty Operator and Isolation Permit Recipient that de-isolation can proceed.
 - The Isolation Permit Issuer removes their black lock from the lock board / lock box and hands keys to orange locks the Isolation Officer.
 - The Isolation Officer removes orange equipment isolation locks and tags in accordance with the Isolation Permit.
 - The Isolation Officer reinstates energy sources in a controlled manner and performs any required start-up checks and function tests.
 - Any temporary overrides, alarms or bypasses are removed and returned to normal.

Version No.	Document No.	Document Owner:	Approval Date:	Document Approver:	Page:
1	PRO-02657	Principal WHS Risk & Systems - P8320	28/09/2026	Head of Workplace Health & Safety - P6061	11 of 14

- The Isolation Officer records completion on the Isolation Permit and advises the Access Officer / Duty Operator that the plant is available for service.

5. Documentation:

- Isolation tags used during the isolation are destroyed once records are complete.
- The completed Isolation Permit is either saved with the work order in Mainpac or saved in REX.

Control Step 10 – Continuously Review and Improve

After significant or high-risk complex isolations (e.g. plantwide outages, complex confined space work, incidents or near misses), the Isolation Permit Recipient and Authorised Isolator should:

- hold a short post job review with the Isolation Officer, Isolation Permit Issuer and key workers
- identify what worked well, any issues or near misses, and improvement actions
- capture improvements to standard isolation instructions or isolation templates
- feed system issues into improvement processes (e.g. hazard reports, change management, updates to Minimum Isolation Standards or plant labelling).

6. Definitions

Refer to the Energy Tag and Lockout Standard ([BST-00004](#)) for definitions relating isolations. The following definitions are included to give context to the Simple Isolation process.

Term	Definitions
Break In Work	A planned pause in work while isolations remain in place (for example, overnight or over several shifts) during which equipment isolation locks and lock board / lock boxes remain secured, but personal red locks and green Isolation Permit Recipient locks may be temporarily removed and re-applied under defined controls.
Complex Isolation	An isolation used when a Simple Isolation is not sufficient - typically involving multiple energy sources or isolation points, multiple workgroups or shifts, or high consequence work - and which is controlled using an Isolation Permit and lock board / lock box.
Inch and Test	A controlled process for temporarily energising plant to test function or direction of movement during a job, then re-isolating and re-verifying before work resumes, as defined in the Isolation Permit.
Lock Board / Lock Box	A dedicated board or box that secures all keys to equipment isolation locks for a Complex or Tiered isolation and provides the point where the Isolation Permit Issuer, Isolation Permit Recipient and all workers apply their locks, so that no one can re-energise plant while any person is still locked on.

Version No.	Document No.	Document Owner:	Approval Date:	Document Approver:	Page:
1	PRO-02657	Principal WHS Risk & Systems - P8320	28/09/2026	Head of Workplace Health & Safety - P6061	12 of 14

7. Roles and Responsibilities

This section supplements the roles defined in the Energy Tag and Lockout Standard ([BST-00004](#)).

Role	Responsibility
Authorised Isolator	- Confirm that a complex isolation is required. - Approve the Isolation Permit including minimum isolation categories and isolation instructions. - Ensure conflicts with operations are identified and managed. - Approve any variance from Minimum Isolation Standards as required by the Energy Tag and Lockout Standard (BST-00004). - Provide technical support to Isolation Officer and Isolation Permit Issuer.
Isolation Officer	- Review the isolation instructions within the isolation permit and physically implement isolation steps. - Apply orange equipment isolation locks and tags then place keys to keys in the lock board / lock box. - Control stored energy. - Perform and document verification of isolation steps. - Manage de-isolation and inch/test steps. - Confirm plant is safe prior to returning to service.
Isolation Permit Issuer	- Ensure Ten Isolation Control Steps are followed. - Confirm the Isolation Permit is approved by an Authorised Isolator before the isolation commences. - Control the lock board / lock box using a black lock. - Confirm workers have attached / removed locks at start of work, after break in work and completion of work - Coordinate shift handover for ongoing isolations. - Ensure forced lock removal process is followed if required.
Isolation Permit Recipient	- Lead planning for the work. - Ensure risk assessments and SWMS are in place. - Coordinate isolations with Access Officer and other permit holders. - Confirm verification of the isolation's effectiveness has been completed and attach green lock before any worker attaches a red lock. - Ensure all workers apply and remove their locks correctly. - Manage break in work and shift handover processes - Confirm completion of work and readiness for de-isolation. - Can not hold the dual role of Isolation Permit Issuer for the same Isolation Permit and scope of work.
Line Supervisor	- Ensure workers are competent and authorised to perform Complex isolations - Confirm that risk assessments, SWMS and other permits reference the Complex Isolation and its verification steps where applicable. - Monitor the job and intervene if the scope, risk or duration changes such that Tiered isolation is required.

Version No.	Document No.	Document Owner:	Approval Date:	Document Approver:	Page:
1	PRO-02657	Principal WHS Risk & Systems - P8320	28/09/2026	Head of Workplace Health & Safety - P6061	13 of 14

Role	Responsibility
LOTO Subject Matter Expert	• Provide specialist advice on hazardous energy and isolation controls. • Support training and competency programs. • Carry out critical control verification activities and audits on complex isolations.
Workers / Contractors	• Participate in pre-start briefings. • Follow SWMS and permits. • Personally verify or ask the Isolation Permit Issuer or Isolation Permit Recipient to demonstrate that the isolation is effective and confirm green lock is present before attaching red personal locks. • Keep red locks on the lock board / lock box whenever working on isolated plant, then remove red locks and sign off when leaving site. • Immediately report any concerns or changes affecting isolation integrity.

8. Training and Competency

Refer to the Energy Tag and Lockout Standard ([BST-00004](#)) for details of training and competency requirements for Complex Isolations.

9. References and Related Materials

Description	Location
BST-00004 Energy Tag and Lockout Standard	REX
Complex Isolation Animation	Vimeo
FRA-00014 Enterprise Risk Management Framework	REX
FRM-00424 Forced Lock Removal Form	REX
FRM-00777 Project Works Permit Form	REX
FRM-00778 Major Works Permit Form	REX
GDE-00368 Principal Contractor Minimum Health, Safety and Environmental Requirements Guideline	REX
MAN-00313 Critical Controls Handbook	REX
PRO-00006 Electrical – High and Low Voltage Procedure	REX
PRO-00657 Hazard Identification and Risk Management Procedure	REX
PRO-00808 Contractor Management Procedure (HSW, Env & DWQ)	REX
PRO-01820 Permit Access Safety System (PASS) Procedure	REX
TEM-00077 Isolation Permit	REX

Version No.	Document No.	Document Owner:	Approval Date:	Document Approver:	Page:
1	PRO-02657	Principal WHS Risk & Systems - P8320	28/09/2026	Head of Workplace Health & Safety - P6061	14 of 14