WORKING AT HEIGHT

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Health and Safety Committee		14th December 2022	
Links or overlaps with other procedures/policies:			
Health and Safety Policy			
Workplace Slips, Trips and Fall Management Procedure			
Falls Prevention Policy			
Permit to Work Management Procedure			

Amendment History

Issue	Status	Date	Reason for Change	Authorised
3.0	Full review	14/10/2022	Review due	Health and Safety Committee

Please note:

If you require a copy of this procedure in an alternative format (for example Large Print, Easy Read) or would like any assistance in relation to the content of this procedure, please contact the Human Resources (HR) team on 01803 656680.

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1. Introduction

The Work at Height Regulations 2005, require the Trust to control the risks associated with working at any place, where if suitable measures are not taken, a person could fall a distance liable to cause injury.

The regulations place duties on employers to ensure that if there is any requirement for a person to work at height all factors involved in the planning, organisation and provision of access equipment, have been given adequate attention to ensure the safety of those individuals has been maintained.

Most organisations will require employees to use equipment to perform a variety of tasks from filing in an office, hanging blinds, decorating and painting, changing light bulbs, maintenance of plant and equipment etc., and the Working at Height Regulations will apply.

The Trust approach will be to design out the risks of working at height so far as is reasonably practicable. Where working at height is necessary, the Trust will ensure all managers identify the tasks within their areas where such equipment is used. They will ensure that the equipment is fit for purpose and that staff are competent in its use. Training may vary from the simple demonstration of a ladder, to more formal training in specialist equipment. Estates and Facilities Managers will also need to ensure contractors are suitably competent and are using the correct equipment for the task.

2. Purpose

The purpose of this document is to enable the Trust to ensure that it provides, so far as is reasonably practicable, a safe working environment free from working at height hazards: by ensuring that potential hazards in the workplace are identified, risk assessed and managed.

It describes the procedures which should be followed, and the factors which should be considered by all employees when dealing with aspects of working at height in the workplace.

3. Definitions

3.1 Height

Any distance that a person or an object might fall and cause injury, loss or damage.

3.2 Fall

A fall is an event whereby an individual unintentionally comes to rest on the ground or another lower level (excluding intentional change in position to rest on furniture, walls or other objects), or any uncontrolled descent of a person or an object from a height.

3.3 Working at Height

Includes moving around at a place of work and will include any place at or below ground level, which requires access or egress to be achieved whilst at work, except by use of a permanent staircase. This would include the use of step stools, stepladders, ladders, specialist access equipment, i.e. mobile elevated work platforms, traditional scaffold, quick fit scaffold, etc.

It will also include work on any roof area, or any platform or intermediary area, where access has been achieved by using any of the equipment mentioned above.

4. Roles and Responsibilities

4.1 Chief Executive

The Chief Executive has overall responsibility for the implementation of this procedure and in turn this responsibility is delegated to the Director of Environment

4.2 Director of Estates and Facilities

The Director of Estates and Facilities has delegated responsibility for the successful implementation, management and monitoring of this procedure.

4.3 Corporate Health and Safety Manager

The Corporate Health and Safety Manager is responsible for providing reports on all working at height incidents for discussion and consideration for addition to the risk register, and/or the assurance framework as well as providing competent advice on the working at height legislation and guidance

4.4 Managers

All managers, supervisors who are responsible for employing, or contracting people, who will carry out work at height will ensure their staff/contractors read, understand and adhere to this procedure and related documents, and in addition the managers must:

- Where possible, avoid the requirement for working at height
- Carry out an assessment of all tasks which could be classed as working at height
- Ensure a Permit to Work (PTW) is in place where necessary
- Determine the most appropriate means of access/ egress
- Consider weather conditions and other factors (such as birds or insects) that could endanger health and safety
- Plan for emergencies and rescue
- Ensure staff carrying out the task are competent to use the equipment which will include correct assembly, and as appropriate, fixing and securing
- Provide collective protection measures (e.g. guard rails) as priority over personal protection measures (e.g. safety harnesses)
- Ensure that training is given to all staff using working at height equipment, which is appropriate to complexity of the equipment. For example, a stepladder or step stool could be by local demonstration by a Manager or supervisor where a scaffold or access equipment will require formal training by the manufacturer, supplier or other

recognized body. The details of this training must be recorded and retained on the personnel file of the staff members trained

- Ensure the risk of falling objects is minimised whilst working at heights e.g. the fitting of toe boards and/or netting should be considered

- Implementing any actions identified from incidents

- Ensure that any fragile areas are adequately marked and made known to employees or others as appropriate

- Ensure that any system of access equipment in use for extended periods is subject to inspection by a competent person to ensure it remains safe, e.g. with scaffolding-weekly inspections

- Ensure access equipment is periodically examined even when not in use to ensure it is maintained in good condition.

- Maintain a record of all ladders and steps within their work area and must ensure they are inspected at least once a year, and that a record of the inspection is kept.

- As necessary engage specialist contractors where heights are considered beyond the capability of employees

4.5 Employees

Any employee who is required to work at height will:

- Ensure any equipment they use remains safe and that they are authorised and trained to use the equipment (before attempting to work at height with the equipment)

- Report any defects immediately to your manager or supervisor

- Report any difficulty or danger regarding the height or the means of access to it

- Make use of any equipment designed to prevent individuals falling or objects falling

- Attend training to ensure competency with use of any access equipment or system

- Ensure equipment, subject to a periodic maintenance programme, has been maintained before using it

- Report any ill health that may permanently or temporarily affect working at heights to your manager

5. Risk Assessment

Risk assessment is the means by which work at height activities and precautions required should be identified.

Risk Assessment could include, but not be confined to, the following issues:

- Access to and egress to/from the area of work
- Height of the work
- The area of work
- Ground conditions (loading etc.)
- Fragile structures (fragile roof/sky lights etc…)
- Falling materials
- Identification & suitability of fall from height protection methods
- Overhead & buried services
- Weather
- Night work/light levels
- Security of the access
- Lifting operations
- Management of emergencies

Due to the location of the Trust sites there may be risks from birds for staff and contractors working outside. Whilst the Trust will assess the risks, and as far as reasonably practicable protect staff from bird attacks and guano, staff and contractors should be aware of these risks and consider these risks during their assessment of the work activity to be carried out.

Considering the Risk Control Hierarchy is a key part of the risk assessment and decision-making process as to how to work safely. The duty holder has to ask themselves the following risk control questions in order to identify work at height activities and ensure adequate precautions are taken:

- Can the need to work at height be avoided in the first place?
- If avoidance is not reasonably practicable, the duty holder should consider the next stage of the hierarchy which is fall prevention. Can a fall be prevented by utilising an existing place of work?
- If fall prevention is not reasonably practicable or measures outlined above do not eliminate the risk of a fall occurring, then the duty holder should mitigate the effects of a fall. Can work equipment be used to minimise the distance and/or consequences of a fall?
- Finally, if it is not reasonably practicable to prevent or mitigate the effects of fall, duty holders should identify and provide additional training and instruction or take other additional suitable and sufficient measures to prevent a fall. Can additional training,

instruction and other suitable and sufficient measures be taken to prevent so far as is reasonably practicable, any person falling a distance liable to cause personal injury?

A flow chart showing the Hierarchy of Control can be found at Appendix 1.

5.1 Rescue/Recovery

The law requires that when work is carried out at height, planning is also undertaken for emergencies and rescue. These arrangements should not rely on the fire brigade as there may be delays and time can be a critical factor in the success of any rescue. Rescue kits are available and suppliers can provide training in their use so that in-house equipment and expertise can be provided

If a plan is necessary, staff must be suitably trained and the equipment should be confirmed as having passed a safety inspection in the required timeframe. A simulation must be undertaken to ensure that the plan is effective and highlights any changes needed.

Examples of when a rescue plan would be required:

- Working in a MEWP (i.e. cherry picker)
- Erection/dismantling of scaffolding

6. The use of ladders

The main cause of all injuries from working at height is people falling from ladders. Ladder and stepladder use can be justified using the bottom of the hierarchy, providing the user has been trained and instructed in the selection and safe use of ladders, and systems are in place to ensure all ladders are maintained and inspected (at least annually).

Decisions and authorisation of the use of ladders must be made by a competent person who has risk assessed the situation. Ladders do not prevent a fall or mitigate a fall but if used by trained operators in appropriate circumstances, i.e. low risk and for short durations, their use can be justified.

When it is necessary to use ladders precautions should normally be taken to prevent a leaning ladder slipping or falling (refer to HSE/Ladder Association Guidance LA455). The hierarchy of precautions in descending order of effectiveness is:

- Where possible, tie (or equally effective secure) the ladder at the top. If this is not reasonably practicable; then
- Tie it part way down (i.e. through a window), or at or near the foot; then
- Use an effective ladder stability device; then
- Wedge the ladder against a suitable fixed structure (e.g. a wall); then
- ‘Foot it’. The best method of footing is by facing the ladder with feet on the bottom rung, each foot as far apart as possible on the rung (stile to stile), and both hands on the stiles. The person footing the ladder should remain in the position described until

the person using the ladder has descended to at least the halfway point. The user and footer should not overload the ladder.

Trust ladders and steps must confirm to Class 1 or BS EN 131. Domestic rated steps must not be used on Trust property.

7. Permit to Work (PTW)

PTW systems detail the work to be carried out, how and when it is to be done and the precautions to be taken. PTW systems are applicable to all staff including contractors.

With regard to Working at Height within the Trust, all roof work where the roof has no fall protection requires a PTW, this includes roof access. PTW may also be necessary for other Working at Height tasks.

Further guidance and information can be found in the Trust Permit to Work Procedure.

8. References

The following references and further reading are applicable to this document:

- Health and Safety at Work Act etc. 1974
- Health and Safety Executive Working at Height Regulations (2005) amended – A brief guide
- Management of Health and Safety at Work Regulations 1999
- The Workplace (Health Safety and Welfare) Regulations 1992
- The Trust Permit to Work Procedure
- HSE/Ladder Association document – LA455 Safe use of ladders and stepladders – A brief Guide

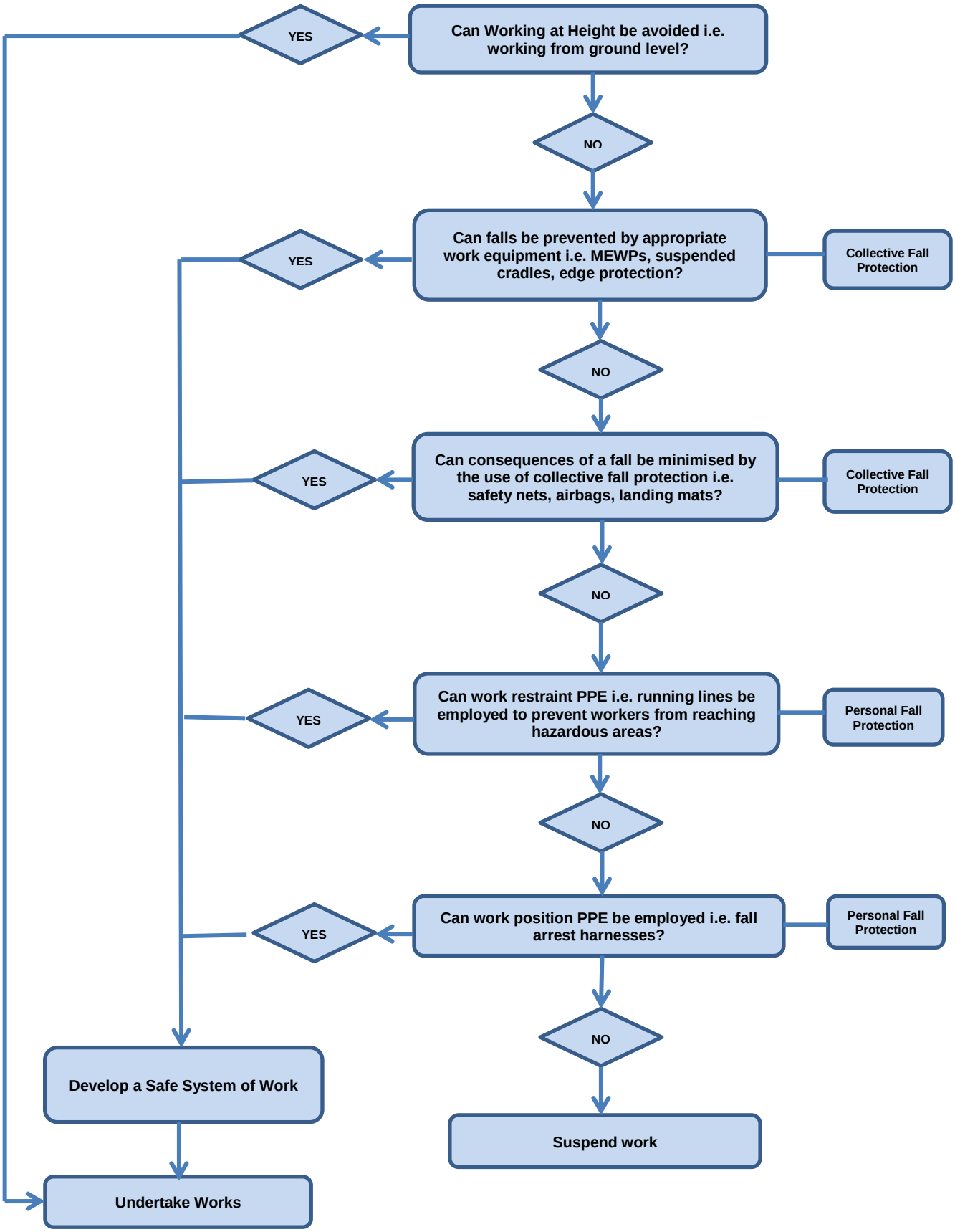
9. Appendices

Appendix 1 – Hierarchy of Control

Appendix 2 – Equality Impact Assessment

Appendix1

Hierarchy of Control



Appendix 2

Equality Impact Assessment

Policy Title (and number)	***WORKING AT HEIGHT***		**Version and Date**	***V3***	
Policy Author	Health and Safety Team				
An equality impact assessment (EIA) is a process designed to ensure that a policy, project or scheme does not discriminate or disadvantage people. EIAs also improve and promote equality. Consider the nature and extent of the impact, not the number of people affected.					
EQUALITY ANALYSIS: How well do people from protected groups fare in relation to the general population? ***PLEASE NOTE: Any 'Yes' answers may trigger a full EIA and must be referred to the equality leads below***					
Is it likely that the policy/procedure could treat people from protected groups less favorably than the general population? (see below)					
Age	Yes ☐ No☒	Disability	Yes ☐ No☒	Sexual Orientation	Yes ☐ No☒
Race	Yes ☐ No☒	Gender	Yes ☐ No☒	Religion/Belief (non)	Yes ☐ No☒
Gender Reassignment	Yes ☐ No☒	Pregnancy/ Maternity	Yes ☐ No☒	Marriage/ Civil Partnership	Yes ☐ No☒
Is it likely that the policy/procedure could affect particular 'Inclusion Health' groups less favorably than the general population? (substance misuse; teenage mums; carers[1]; travellers[2]; homeless[3]; convictions; social isolation[4]; refugees)					Yes ☐ No☒
Please provide details for each protected group where you have indicated 'Yes'. **Suitable risk assessment will be completed depending on staff circumstances.**					
VISION AND VALUES: Policies must aim to remove unintentional barriers and promote inclusion					
Is inclusive language[5] used throughout?					Yes ☒ No☐
Are the services outlined in the policy/procedure fully accessible[6]?					Yes ☒ No☐
Does the policy/procedure encourage individualised and person-centered care?					Yes ☒ No☐
Could there be an adverse impact on an individual's independence or autonomy[7]?					Yes ☐ No☒
If 'Yes', how will you mitigate this risk to ensure fair and equal access? See individual Risk Assessment.					
EXTERNAL FACTORS					
Is the policy/procedure a result of national legislation which cannot be modified in any way?					Yes ☒ No☐
What is the reason for writing this policy? (Is it a result in a change of legislation/ national research?)					
The purpose of this Procedure is to enable the Trust to ensure that it provides, so far as is reasonably practicable, a safe working environment free from working at height hazards: by ensuring that potential hazards in the workplace are identified, risk assessed and managed.					
Who was consulted when drafting this policy/procedure? What were the recommendations/suggestions?					
Health and Safety Committee					
ACTION PLAN: Please list all actions identified to address any impacts					
Action			**Person responsible**		**Completion date**
none					
AUTHORISATION: **By signing below, I confirm that the named person responsible above is aware of the actions assigned to them**					
Name of person completing the form	Senior Corporate Health & Safety Advisor		**Signature**	SE	
Validated by (line manager)	Corporate Health & Safety Manager		**Signature**	KW	