

CONTENTS	Page
1.0 INTRODUCTION.....	1
2.0 GENERAL STATEMENT	1
3.0 DEFINITION	2
4.0 ORGANISATION AND MANAGEMENT	2
5.0 WORKING AT HEIGHT RISK ASSESSMENT	4
6.0 HIERACHY OF CONTROL.....	5
7.0 THE USE OF STEP LADDERS AND LADDERS	6
8.0 PERMIT TO WORK.....	6
9.0 TRAINING AIDS & FURTHER ADVICE.....	6
10.0 MONITORING, AUDIT & REVIEW	7

1.0 INTRODUCTION

Falls from height account for a significant number of workplace injuries and unnecessary deaths every year across a wide range of work at height activities. Common causes are falls from ladders and through fragile roofs. The purpose of the 'Working at Height Regulations 2005' (WAHR) is to prevent death and injury from a fall from height.

The WAHR operate alongside the 'Management of Health and Safety at Work Regulations 1999', which require an employer to undertake a suitable and sufficient risk assessment of the health and safety issues within the workplace that may affect employees and others associated with the business activities.

These regulations apply in all cases where an assessment indicates there is a possibility of risk of a fall whilst carrying out a task.

Purpose

This policy is intended to alert staff of the risks presented by working at height and the measures required to safeguard against injury, also to identify the responsibilities of individuals in identifying and managing risk.

Scope

This policy applies to all staff and their line managers/supervisors who may be involved with working at height, at any time, in any situation described in the definition below.

2.0 GENERAL STATEMENT

The organisation acknowledges that working at height can lead to accidents many of which can result in serious injury or death. The organisation's policy therefore, is to comply with both the letter and the spirit of the law on Health and Safety at Work, specifically in accordance with the Work at Height Regulations 2005 and to this end, the provisions of this policy are centred around ensuring that in any requirement for an employee to work at height all the factors involved in the planning, organisation and provision of access equipment have been given due attention to ensure safety of those individuals involved has been maintained. The provision of any access equipment has to be given much more consideration than simply assuming that existing equipment is fit for all the tasks it is being used for.

Most organisations will require their staff to use equipment of ranging types to perform a range of tasks that may require some form of work at height to be involved. This could be use of ladders (any type) to use of Mobile Elevated Work Platforms (MEWPs) and the Regulations therefore apply. Falls or falling objects even from heights at relatively low levels present an unacceptable risk to people.

The overriding principle for the organisation is to do "all that is reasonably practicable to prevent anyone falling". Consequently the procedures and guidance below must be undertaken prior to commencing any work at height.

This working at height policy supports and extends the organisation's Health and Safety policy and provides guidance for those operations which involves working above or below the ground where falls or falling objects are likely to cause injury. Both the organisation and contractors working on the organisation's premises all have responsibilities under health and safety law. By employing a contractor, the organisation will not be able to handover total responsibility and must take care to discharge its own responsibilities diligently.

Implementation: It is the responsibility of line managers to ensure that staff members are aware of and understand this policy and any subsequent revisions.

3.0 DEFINITION

The term 'Working at height' is carrying out a task in any place, including a place at, above or below ground level, where a person can be injured if they fell from that place. Access and egress (getting in & out) from a place of work can also be work at height.

Examples include:

- Use of a kick stool
- Use of any step ladder/ladder
- Working on a flat roof
- could fall through a fragile surface;
- could fall into an opening in a floor or a hole in the ground.
- Working at ground level adjacent to an open excavation

Examples where the regulations don't apply:

- Walking up and down staircases
- Slipping or tripping at ground level
- Sitting on a chair

4.0 ORGANISATION AND MANAGEMENT

Chief Executive Officer

The Chief Executive has overall responsibility for ensuring that the Company meets its statutory obligations and that effective arrangements for the management of health and safety are put in place.

Senior Leadership Team (Chief Officers)

The Senior Leadership Team have responsibility for ensuring that the Organisation meets its statutory obligations and that effective arrangements for the management of health and safety are put in place and are therefore responsible for setting and approving policy direction.

The Health and Safety Team

The Health and Safety Team are responsible for advising on appropriate measures to meet legal and organisational requirements as required and for regularly monitoring and reviewing any incidents/accident that involve working at height to ensure that the provisions of this policy were implemented.

Line Managers

Line Managers are responsible for

- Where possible, avoid working at height.
- Undertaking an assessment of all tasks which could be classed as working at height.
- Ensure a Permit to Work (PTW) is in place where necessary through the My Compliance system.
- Determining and provision of the most appropriate access equipment.
- Consider weather conditions 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) priority over personal protection measures (e.g. safety harnesses).
- Ensuring 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 or supplier.
- Ensuring the risk of falling objects is minimised whilst working at heights e.g. the fitting of toe boards and/or netting should be considered where appropriate.
- Implementing any actions identified from incidents.
- Ensuring that any fragile areas are adequately marked and made known to employees or others as appropriate.
- Ensuring 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.
- Ensuring access equipment is periodically examined even when not in use to ensure it is maintained in good condition.
- Maintaining a record of all ladders and steps within their work area and ensuring they are inspected at least once a year, and that a record of the inspection is kept.
- As necessary engaging specialist contractors where heights are considered beyond the capability of employees.

Employees

Any employee who is required to work at height will:

- Assisting with the assessment of risks as determined by the Line Managers.
- Complying with any safe system of work developed through risk assessment and any requirements of a permit to work.
- Using the appropriate access equipment in accordance with instruction/information and training provided.
- Using any safety equipment supplied.
- Informing their managers if they suspect that the system of work in place is ineffective or inadequate.
- Report any defects immediately to your manager or supervisor.
- Reporting any activity or defect likely to endanger safety.
- Make use of any equipment designed to prevent individuals falling or objects falling.
- Undertake training to ensure competency with use of any access equipment or system.
- Ensure equipment, subject to periodic maintenance programme, has been maintained before using it
- Reporting all incidents (including near misses) and any defects in equipment using the My Compliance electronic reporting system.
- Report any ill health that may permanently or temporarily affect working at heights.

- Report to management if they suspect they may not be fit enough to work at height.

Contractors

It will be accepted that the standards described within the policy will form part of any Contractor selection process.

All managers who are involved in engaging contractors or others, where working at height is part of the work, have a duty to ensure that the Contractor adopts the standards within this document.

As such Council employees are required to report contractor non-compliance to their Manager/Facilities Department (where relevant) or Health and Safety Team.

Contractors are responsible for providing their own access equipment that is maintained and in good working order.

Health and Safety Trade Union Representatives

Health and Safety / Trade Union Representatives have certain responsibilities and duties and are able to audit and complete inspections where required.

Health and safety representatives are fellow workers who represents other union members to look after the health and safety at work of people they work with.

Health and Safety Representatives have the right to:

- take an active part in workplace risk assessments.
- investigate potential hazards and 'dangerous occurrences' and examine the accident data.
- investigate members' complaints.
- carry out inspections of the workplace in work time, at least every three months.
- be consulted on new working practices and new technology.
- receive safety information from their employer (such as inspectors' reports, hygiene surveys and risk assessments).
- attend union-approved training courses without loss of pay; and have access to a phone and office equipment, and paid time off work, both to carry out inspections and to meet staff and other safety reps.

5.0 WORKING AT HEIGHT RISK ASSESSMENT

A risk assessment is a requirement of health and safety legislation. It is a careful examination of what could cause harm to people as a result of work activity. It will allow you to take the necessary precautions to prevent harm occurring. In a risk assessment you will need to:

- Look for the hazards.
- Decide who might be harmed and how (falling or something falling on someone nearby).
- Evaluate the risks and decide whether the existing precautions are adequate, or should more be done (do you need to provide additional equipment or training to reduce the risk).
- Record your findings.
- Review your assessments and revise it if necessary (if there are any changes, if the weather has worsened or there has been an accident).

In addition, any risk assessment for working at height should consider the following:

- All work at height is properly planned and appropriately supervised.

- Those working at height are competent.
- The place where work at height is done, is safe.
- The weather conditions are considered, and all work is stopped if weather conditions endanger health or safety.
- Distance and consequences of a fall.
- Duration and frequency of task.
- Equipment for work at height is suitable and properly inspected and maintained.
- Risk of use, installation and removal of equipment.
- Access and egress.
- The risks from fragile surfaces are properly controlled.
- Procedures in case of emergency are planned for.

Once a risk assessment has been conducted the working at height 'hierarchy of control' should then always be implemented.

A sensible approach should be adopted when considering precautions for work at height. There may be some low-risk situations where common sense tells you no particular precautions are necessary and the law recognises this.

There is a common misconception that ladders and stepladders are banned, but this is not the case. There are many situations where a ladder is the most suitable equipment for working at height.

6.0 HIERACHY OF CONTROL

Under Regulation 6 of the Work at Height Regulations, there is hierarchy of control for determining how to work at height safely. The hierarchy has to be followed systematically and only when one level is not reasonably practicable may the next level be considered. It is not acceptable to select work equipment from lower down the hierarchy (e.g. personal fall arrest, such as harnesses and lanyards) in the first instance. The hierarchy has three basic steps to consider, in order these are AVOID, PREVENT, MINIMISE.

It is the responsibility of the duty holder to:

- avoid working at height where it is reasonably practicable to do so.
- where working at height cannot be avoided, prevent falls using either an existing place of work that is already safe or the right type of equipment.
- minimise the distance and consequences of a fall, by using the right type of equipment where the risk cannot be eliminated.

Therefore always:

- Do as much work as possible from the ground.
- Ensure staff can get safely to and from where they work at height.
- Ensure equipment is suitable, stable and strong enough for the job, maintained and checked regularly.
- Make sure you don't overload or overreach when working at height.
- Take precautions when working on or near fragile surfaces.
- Provide protection from falling objects.
- Consider your emergency evacuation and rescue procedures.

It is not always necessary to implement all parts of the hierarchy, e.g. in the case of a fully boarded and guarded scaffold, workers would not be expected to wear personal fall arrest equipment in addition.

Rescue/Recovery

The law requires that when working at height, there also needs to be in place a plan for emergencies and rescue.

If a plan is necessary, a simulation must be undertaken to ensure that it 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

7.0 THE USE OF STEP LADDERS AND LADDERS

The main cause of all injuries from working at height is people falling from ladders. Ladder and stepladder use can be justified for low risk and short duration work providing the user has been trained and instructed in the selection and safe use of ladders, and systems are in place to ensure ladders are maintained and inspected.

Decisions and authorisation of the use of ladders must be made by a competent person who has risk assessed the situation.

When it is necessary to use ladders, precautions should normally be taken to prevent a leaning ladder slipping or falling (refer to HSE Guidance INDG455). 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.

Step ladders and any ladders used must conform to Class 1 or BS EN 131. Domestic rated steps must not be used.

8.0 PERMIT TO WORK

A permit-to-work system is a formal written safe system of work used to control potentially high-risk work activities. It specifies the precautions that need to be taken to control the risks. Examples include working in confined spaces, ACM's, roof work, excavation work, electrical system work, and hot work.

Permit-to-work systems ensure that work can be carried out in a safe way and begin only after safe procedures have been defined and put in place.

Regarding Working at Height, all contractor roof work requires a PTW, this includes roof access to ensure their works are managed safely.

All permit to works must be raised and closed within the My Compliance system for contractors attending our premises to complete roof works.

9.0 TRAINING AIDS & FURTHER ADVICE

All staff who are required to work at height must be competent to carry out the task safely, staff who use ladders must receive training in the safe use and procedures.

The following guidance published by the HSE may be used towards providing suitable training.

Additional guidance and advice can be downloaded for free from the HSE website

<https://www.hse.gov.uk/work-at-height/index.htm>

10.0 MONITORING, AUDIT & REVIEW

The Health and Safety Team and the Health and Safety Trade Union Representatives will regularly monitor and review any incidents/accident that involve working at height to ensure that the provisions of this policy were implemented.

The line manager/supervisor will also provide adequate instruction and supervision to their staff to ensure safe working practices are followed, and review systems of work following incidents and near misses involving working at height.

Any member of staff with a concern regarding working at height tasks, should ensure that it is discussed with their supervisor or manager.

This policy will be reviewed as part of the regular reviews, unless changing circumstances require an earlier review.