



Work At Height Health & Safety Management Standard Issue 3 (April 2011)

Introduction

This document contains corporate standards and guidance on the management of risks arising from work at height. It is the responsibility of managers to ensure that any activities or operations involving working at height are managed in line with this document, in any area under their control.

This document must be read in conjunction with any additional guidance specific to Divisional issues or activities.

Managers' Checklist – Work At Height

The checklist below identifies key actions involved in managing the health and safety risks arising from work at height. Further information on each of these points is contained in this document.

1. Have all work at height activities and operations been identified?
2. Have risk assessments of these activities/operations been carried out?
3. Has adequate consideration been given to avoiding work at height?
4. If it is not possible to avoid a work at height activity/operation, has appropriate work equipment been selected and provided, and other control measures put in place to prevent falls from height?
5. If the risk of a fall cannot be eliminated, has appropriate work equipment been selected and provided, and other controls put in place to minimise the distance and consequences of a fall should one occur?
6. Is work at height activities/operations properly planned and organised?
7. Has the use of ladders and stepladders been minimised?
8. Is supervision carried out to ensure unsuitable access methods and equipment are not in use?
9. Are the risks from fragile surfaces properly controlled?
10. Is equipment used for work at height periodically inspected and maintained by a competent person?
11. Is there provision in place for equipment repairs to be carried out by a competent person?
12. Are inspection and maintenance records kept?

Defining 'Work At Height'

When considering how to manage work at height, the first step is to identify the work at height activities and operations that are carried out.

Work at height is work in any place (including a place at or above ground level) where a person could be injured if they fell from that place. Access and egress to a place of work (e.g. climbing a ladder to get to a higher point) can also be work at height.

Examples of work that is classified as work at height include:

- Working on a flat roof.
- Working from a ladder or stepladder.
- Working at ground level adjacent to an open excavation.
- Work near or adjacent to fragile materials (e.g. roof materials).
- Work from scaffolding.
- Work from a mobile elevated working platform (MEWP).
- Work on or from open sided vehicles.

Examples of where the Work at Height Regulations don't apply include:

- Walking up and down stairs in a building. However, work on stairs (e.g. maintenance or decorating activities) would be classified as work at height.
- Working in the upper floors of a building.
- An operator sitting in the seat of a vehicle.
- Sitting in a chair.
- Slips and trips on the same level.
- Caving or climbing involved in sport and recreation activities.

The Work at Height Regulations provide a 'hierarchy of control' for determining how to manage the risks arising from work at height:

- (a) Avoid work at height.
- (b) Where work at height cannot be avoided, use work equipment or other measures to prevent falls.
- (c) Where the risk of a fall cannot be eliminated, use work equipment or other measures to minimise the distance and consequences of a fall should one occur.

It is not necessary to implement all parts of the hierarchy if the risks are adequately controlled by one part. For example, in the case of a fully boarded and guarded scaffold platform, employees would not be expected to also wear personal fall-arrest equipment.

Work At Height Risk Assessments

After identifying work at height activities and operations, the next stage is to carry out a risk assessment. Within LCC, a documented risk assessment is required for all work at height activities/operations, except those that pose only low or minor risks (e.g. using of a kick-step to access shelves in an office). However, work at height activities that involve only low or minor risk should be included in the general risk assessments for the section / unit.

Within LCC it is the responsibility of managers to ensure that risk assessments are carried out within their area of control. Managers can either carry out risk assessments themselves, or delegate this task to individuals within their area of responsibility. If a manager delegates the task of carrying out a risk assessment, they must ensure that the person(s) is competent to carry out the assessment and takes all reasonable care when doing so. The manager remains responsible for the risk assessment and its implementation.

To assist in this process, a Work at Height Risk Assessment form is provided with this document.

Avoiding Work At Height

It may not be possible to avoid work at height, but consideration should always be given to whether avoidance is possible. For example, some window-cleaning firms now use extendable cleaning poles to avoid the use of ladders, and automatic 'sheeting' equipment can be fitted to large vehicles.

Preventing Falls From Height

If it isn't reasonably practicable to avoid work at height, the next consideration is whether equipment or other measures can be taken to prevent falls. E.g. by using working platforms with guardrails, or access equipment such as MEWPS (Mobile Elevating Work Platforms such as cherry pickers, scissor lifts, etc.).

Falls from over 2 metres

Previously there was a distinction between potential falls above and below 2 metres, and the actions required to prevent falls (e.g. fitting of guardrails to scaffolding). Although the previous '2 metre rule' is not contained in the Work at Height Regulations, there should be no dilution of existing safe working practices for work above 2 metres.

Where the potential fall height is 2 metres or more, the Health & Safety Executive will always expect action to be taken to prevent falls. When deciding on access equipment, the expectation is that guardrails and working platforms will be used, unless the risk assessment identifies that other equipment or measures will provide a better level of protection.

Falls from less than 2 metres

Although the '2 metre rule' has been removed, the Work at Height Regulations still requires a sensible risk based approach to preventing falls. For example, the handrails on a tower scaffold should not be deliberately removed just because the platform is less than 2 metres high.

If the risks are minor, it is not reasonably practicable to take extensive precautions. Therefore, the only action that may need to be taken is to provide relevant information, instruction or training for those carrying out the activity/operation.

Minimising Falls From Height

If it isn't possible to avoid work at height, or implement controls to prevent falls from occurring, then further steps must be taken to minimise the distance and consequences of a fall. This may be achieved through the adoption of systems such as safety nets, fall arrest, work-restraint, work positioning, rope access and positioning techniques, etc.

Your allocated H&S Team is able to advise on the suitability of controls.

Selecting The Right Equipment

One of the intended outcomes of carrying out a risk assessment is that the right equipment will be selected for that particular activity/operation. When selecting work equipment for use when working at height, the following factors need to be taken into account:

- The working environment: What are the ground conditions? Are there likely to be space constraints? Are other people working in the same area? Is it in a public area?
- The duration and frequency of use: Is the work activity of short duration? Is it repetitive?
- Emergency and rescue procedures: Can a timely evacuation and/or rescue be instigated?
- The distance and consequences of a potential fall: Can a fall occur? If so does it have the potential to cause injury?
- In the case of access and egress, what is the distance to be travelled?
- Are there any additional risks posed by the installation, use, dismantling or removal of the work equipment?
- Are the dimensions of the work equipment adequate to ensure a safe working area and safe access/egress?
- Is the equipment adequate for the potential loadings of people, equipment and materials?
- Is the equipment appropriate for the nature of the work to be undertaken?

Not all of these factors will be relevant to all work at height activities/operations. Further advice on these issues is given in the relevant sections of this document.

Collective And Personal Control Measures

When deciding on appropriate control measures, it must be remembered that collective control measures always take priority over personal control measures. Collective measures (such as scaffolding, airbags and safety nets) protect more than one person at any one time and are usually passive, i.e. they require no action by the user to work properly. Personal control measures (e.g. fall-arrest harnesses) rely upon personal protective equipment and only protect the user. They are also usually active, i.e. the user has to do something for the equipment to work, (e.g. clipping on an anchorage point).

Planning And Supervision

Work at height activities/operations need to be planned and organised **in advance** of the activity. If the activity or operation is not high risk and occurs regularly, it may be possible to document a 'standard' safe system of work or procedure, rather than create a formal plan each time the task is carried out.

The safe system of work should take account of:

- Any supervision that may be necessary. For example, the use of fall arrest equipment will require a higher level of supervision.
- Restrictions arising from weather conditions. For example, carrying out maintenance on an icy roof, or working in windy and/or rainy conditions on a slippery surface.
- Any emergency or rescue procedures that may be required. For example, if a person falls while using a fall-arrest system how will they be rescued?

Unsuitable Equipment and Methods

All work at height must be properly planned whether it is a major project or just accessing a shelf at high level. Part of the planning is the selection of the appropriate access equipment. It is all too easy, and common - place, for someone to use access equipment or methods that are not only inappropriate but also puts the user at risk.

Unsuitable access methods include:

- Standing on a chair.
- Standing on a table, desk or other office furniture.
- Standing on a box or other similar object.
- Using damaged stepladders or ladders.
- Using stepladders and ladders that are not long enough.
- Straddling between a stepladder or ladder and another object.
- Sitting on someone's shoulders.
- Etc.

Suitable footwear

Those working at height must wear suitable footwear; this means a decent non-slip sole and preferably ankle support. Where appropriate safety, footwear must be worn. Inappropriate footwear includes, open toed sandals, flip-flops, high heels, footwear with laces undone, etc.

Ladders And Stepladders

The Work at Height Regulations do not ban the use of ladders and stepladders, but they do require that careful consideration is given to their use.

It is likely that any work at height carried out below 2 metres will be done by using a ladder or stepladder. The risk assessment will determine if this is the correct choice, as a suitable method of access, if this is the case guidance issued by the HSE should be followed.

It should also be remembered that the HSE define a ladder or stepladder as a means of access and not a working platform, however by following the HSE guidance short-term work is allowed.

Ladders should only be used where the use of other equipment (such as tower scaffolds, podium steps or temporary stairs) is not possible or appropriate. Where ladders and stepladders are used they should only be used for light and short duration work.

Work activities involving the carrying of heavy loads should never be carried out from a ladder. When using a ladder, three points of contact should be maintained (i.e. two feet and a hand). Therefore, if a task requires both hands, ladders (and stepladders without a purpose designed standing platforms) are not the right equipment for the task.

Fragile Surfaces

Controls should be in place to ensure that employees and others (e.g. contractors) do not go onto or near any fragile surface through which they could fall. The only exception to this rule is where it is the only reasonably practicable way for the work to be carried out safely, having fully considered the demands of the task, equipment and working environment.

All fragile surfaces should be identified with prominent warning notice fixed at approaches to the danger zone (see the example safety sign opposite). Roof spaces, roof coverings and skylights are often fragile surfaces. Please contact your Divisional H&S Team or Property Consultant for further advice on identifying fragile surfaces.



If work on or near a fragile surface is unavoidable:

- It must be ensured that suitable platforms, covering, guardrails, etc, are provided and are used.
- If the risk of a fall still remains, the distance and effect of a fall must be minimised (see previous sections).
- It must be carried out under a "Permit-to-Work".

Falling Objects

The risk of falling materials should be minimised by keeping working platforms clear of loose materials. In addition, toe boards, solid barriers and/or brick guards should be provided at open edges. If scaffolding is erected in a public place; debris nets, fans or covered walkways (as appropriate) should also be provided.

Where material needs to be dropped or removed from a platform the method should be decided during planning, so that it can be done in a controlled manner. For example using a chute into a receiving area that is clearly marked (e.g. with clear warning signs) and barriered to prevent people going into it.

Checks And Inspections

Checks

The user or operator must always carry out checks on every occasion before the work at height activity/operation begins. E.g. visually inspecting the surface on which access equipment will be placed, checking any existing edge or fall protection, the actual access equipment, etc.

Inspections

Whereas 'checks' may be just a visual examination of equipment before it is used, the Work at Height Regulations identifies inspections as being a more formal process. Inspections must be carried out by a competent person for the following types of equipment:

- Scaffolding and other working platforms fitted with handrails, toe-boards, barriers, etc.
- All types of personal fall protection and fall arrest systems.
- Ladders and stepladders.
- Mobile elevated working platform
- Inspections should be carried out:
 - Each time it is assembled or installed.
 - At intervals so that any deterioration can be detected and remedied in good time.

Where inspections are necessary, systems must also be in place to formally record that they have been carried out. If you use any of the types of equipment that require formal inspections, your Divisional H&S Team are available to advise on competency issues, inspection frequencies and record keeping.

Repairs

During the formal inspections it may be identified that the ladder or stepladder is damaged or faulty and is in need of repair. Repairs must be carried out by a competent person who has been trained to do so. Repairs that are done must be recorded for future reference.

Alternatively during the inspection it may be identified that the ladder or stepladder is beyond economical repair, in which case the ladder or stepladder must be withdrawn from use, secured to prevent it from being used and ultimately destroyed.