

# Health & Safety Policy

## HSP 13

### Working at Height

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Key Document details:

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<b>Title:</b>	HSP13 – Working at Height
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<b>Application:</b>	This policy applies equally to all The White Horse Federation (TWHF) employees including agency or casual staff, and to all premises where TWHF is either the ‘employer’ or is in control of the premises.

<b>Definitions</b>	For the purpose of this policy, the following definitions apply;	
	Work at Height	A place is ‘at height’ if a person could be injured falling from it while undertaking work activities, even if it is at or below ground level.
<b>Policy Aims</b>	<p>To ensure adequate arrangements are put in place to prevent anyone falling or objects falling while undertaking work activities deemed to be at height.</p> <p>These arrangements will ensure:</p> <ul style="list-style-type: none"> <li>• all work at height is properly planned and organised;</li> <li>• all work at height takes account of weather conditions that could endanger health and safety;</li> <li>• those involved in work at height are trained and competent;</li> <li>• the place where work at height is done is safe;</li> <li>• equipment for work at height is appropriately inspected;</li> <li>• the risks from fragile surfaces are properly controlled and</li> <li>• the risks from falling objects are properly controlled.</li> </ul>	
<b>Policy</b>	<p>It is the policy of THWF to comply with the Work at Height Regulations 2005 (as amended) to do all that is reasonably practicable to prevent anyone falling, where there is a risk of a fall liable to cause personal injury.</p> <p>In undertaking its duties with regards to Work at Height, TWHF will ensure that:</p> <ul style="list-style-type: none"> <li>• where working at height cannot be avoided, a suitable and sufficient risk assessment must be undertaken by a competent person to identify the significant risks associated with working at height.</li> <li>• adequate control measures must be implemented to reduce the risks associated with identified hazards. All control measures must be communicated to the relevant persons, implemented and monitored by managers.</li> <li>• adequate training is provided for employees who are expected to work at height, as identified by the risk assessment.</li> <li>• work at height is properly planned, appropriately supervised, and carried out in as safe a way as is reasonably practicable. The planning must include consideration of emergency situations, rescues and weather conditions.</li> </ul>	
<b>Risk</b>	Falls from height remain the single biggest cause of workplace deaths and one of the main causes of major injury.	
<b>Responsibility</b>	This responsibility is discharged primarily at the line management/operational level.	

	<b><u>Roles &amp; Responsibilities</u></b>
1.	<p>Roles and responsibilities are defined in HSP2 Organisation.</p> <p>Any specific actions are detailed in the arrangements section below.</p>
	<b>Arrangements</b>
1.	<p><b>Risk Assessment</b></p> <p>If work at height cannot be avoided, then a risk assessment must be carried out for all such activities. You do not have to do a work at height risk assessment for tasks that pose a very low or trivial risk, such as using a kick stool to access shelves in an office. However, these activities must be included in your general risk assessment. You must make sure equipment is well maintained, and that employees are given appropriate information, instruction and training to make sure that they don't overload or overreach.</p> <p>Examples of what to consider in your work at height risk assessment include the:</p> <ul style="list-style-type: none"> <li>• work activity;</li> <li>• equipment to be used;</li> <li>• duration of the work;</li> <li>• location where the work is to take place, as there could be hazards, such as overhead power lines, open excavations, underground services or microwave transmitters etc.</li> <li>• working conditions, such as weather conditions and lighting;</li> <li>• condition and stability of existing work surfaces;</li> <li>• physical capabilities of those carrying out the work, for example, vertigo sufferers. This is also linked to whether they will be working alone, as they need to be medically fit and capable of doing this.</li> </ul>
2.	<p><b>Planning</b></p> <p>Any work at height needs to be planned and organised <b>in advance</b> of the activity. You must:</p> <ul style="list-style-type: none"> <li>• make sure that no task is done at height, if it is safe and reasonably practicable to do it without working at height;</li> <li>• take account of your risk assessment for the activity;</li> <li>• make sure that the work is: – properly planned, including the selection of equipment, carried out in as safe a way as is reasonably practicable, and appropriately supervised. For example, the use of fall arrest equipment will require a higher level of supervision;</li> <li>• plan for emergencies and rescue. For example, if a person falls while using a fall arrest system, how will they be rescued?</li> <li>• take account of the weather conditions. You must postpone tasks if weather conditions endanger health and safety. This could be due to high winds or where low temperatures or rain make surfaces slippery.</li> </ul> <p>If the activity is not high risk and occurs regularly, think about developing a standard safe system of work or procedure, rather than creating a formal plan each time the task is carried out.</p>
3.	<b>Hierarchy of Controls for Work at Height</b>

	<p>A simple hierarchy for managing the risks and selecting equipment for work at height is given in the Work at Height Regulations 2005. This is:</p> <ol style="list-style-type: none"> <li><b>1. Avoid work at height where you can</b> Is it reasonably practicable to do the work safely from the ground?</li> <li><b>2. Prevent falls</b> Use work equipment or other measures to prevent falls, where you cannot avoid working at height.</li> <li><b>3. Minimise injuries</b> Where you cannot eliminate the risk of a fall, use work equipment or other measures to minimise the distance and consequences of a fall should one happen.</li> </ol> <p>This must be followed systematically. Only consider the next level when it has been checked that the previous one isn't reasonably practicable. So it is not acceptable to select work equipment from lower down the hierarchy, for example, personal fall arrest such as harnesses, without considering whether the work at height can be avoided altogether.</p> <p>This hierarchy is the key part of the risk assessment process, and will help you decide what is reasonably practicable for the task. It does not specify the equipment needed; it is up to the assessor to decide.</p> <p>It is not necessary to implement all parts of the hierarchy if the risks are adequately controlled by one part. For example, if a fully boarded and guarded scaffold platform was being used, employees wouldn't be expected to also wear personal fall arrest equipment.</p>
4.	<p><b>Weather</b></p> <p>Where weather conditions are such that it presents further hazards endangering health and safety, all work at height activities should be postponed until weather conditions improve. For example, this could be due to high winds or where low temperatures or rain make surfaces slippery.</p>
5.	<p><b>Training</b></p> <p>TWHF will ensure that it's staff:</p> <ul style="list-style-type: none"> <li>• involved in work at height, or supervising work at height receive suitable information, instruction and training.</li> <li>• who supervise personnel using access equipment shall be trained and competent to do so.</li> <li>• who use ladders; stepladders, podiums, scaffolds and other access equipment are trained to do so.</li> <li>• know their limitations and when to seek expert advice.</li> </ul>
6.	<p><b>Selecting Equipment</b></p> <p>A work at height risk assessment will help you to select the right work equipment for your task. You must consider following the hierarchy for selecting work equipment:</p> <ol style="list-style-type: none"> <li>I. can a fall be prevented using collective protection, such as guard rails and working platforms?</li> <li>II. if this is not reasonably practicable, is personal prevention equipment, such as work restraints, appropriate?</li> </ol>

	<p>III. otherwise, can you minimise the risk with collective equipment, such as nets, bean bags or air bags? If this is not reasonably practicable,</p> <p>IV. look at minimising the risk with personal equipment, such as fall arrest and rope access.</p> <p>Collective measures, such as scaffolding, edge protection and mobile elevated work platforms (MEWPs), protect more than one person at any one time, and are usually passive measures. This is because they do not require specific action by the user to work properly. Collective protection equipment should be considered before anything else. This is the top of the hierarchy of controls.</p> <p>Personal control measures, such as fall arrest and work positioning harnesses, rely upon personal protective equipment, and only protect the user. They are usually active measures because the user has to do something for the equipment to work, for example, clipping on an anchorage point.</p>
7.	<p><b>Inspections</b></p> <p>The Work at Height Regulations define inspection as such visual or more rigorous inspection by a competent person, as is appropriate for safety purposes, including any testing appropriate for those purposes.</p> <p>This is a more formal process than doing ‘checks’, which may be just a visual examination of equipment before it’s used.</p> <p>Inspections should be carried out to fulfil not only the statutory requirements of the Work at Height Regulations, but also, the Provision and Use of Work Equipment Regulations (PUWER) and the Lifting Operations and Lifting Equipment Regulations (LOLER).</p> <p>Inspections must be carried out on:</p> <ul style="list-style-type: none"> <li>• scaffolding</li> <li>• working platforms</li> <li>• collective fall arrest systems, such as nets and air bags</li> <li>• personal fall protection systems, such as work restraints, work positioning, fall arrest and rope access</li> <li>• ladders and stepladders.</li> </ul> <p>They must be done:</p> <ul style="list-style-type: none"> <li>• each time the equipment is assembled or installed, or after both, if its safety depends on how this is done</li> <li>• at intervals so that any deterioration can be detected and remedied in good time.</li> </ul> <p>Systems must be put in place to make sure that these inspections are carried out and recorded.</p> <p>It should be ensured that any equipment supplied by a third party is:</p> <ul style="list-style-type: none"> <li>• marked or tagged with an inspection date, or</li> <li>• has the inspection report with it, showing that the last inspection required by the regulations has been carried out. This must be clear to everybody involved, and must be checked before the equipment is used.</li> </ul>

	<p>The inspection requirements for scaffolding and other working platforms used for construction work are still in place. This means that:</p> <ul style="list-style-type: none"> <li>• they must be inspected before first use, and then at least not more than every seven days</li> <li>• an inspection report must be prepared, and kept on site until the work is completed, and</li> <li>• all site copies of the inspection reports must be kept for another three months afterwards.</li> </ul> <p>All other inspection records must be kept until the next one has been carried out.</p>
8.	<p><b>Fragile Surfaces</b></p> <p>Where work on or near fragile surfaces cannot be avoided then all reasonably practicable control measures will be implemented to mitigate the possibility of falls of people or objects. The control measures must include:-</p> <ul style="list-style-type: none"> <li>• The selection and use of suitable platforms, coverings, guard rails to minimise the risk of falls or falling objects.</li> <li>• Where there is a residual risk remaining then minimise the distance and effect of a fall.</li> <li>• Implement the use of suitable and sufficient barriers, warning notices and signage to clearly indicate and warn others of the danger zone.</li> <li>• Access and egress should be restricted to authorised persons only and using the appropriate Personal Protective Equipment (PPE) at all times.</li> </ul> <p><b><i>Remember that roof spaces, roof coverings and skylights are often fragile surfaces.</i></b></p>
9.	<p><b>Falling Objects</b></p> <p>If there are risks from falling objects, they must be properly controlled. This includes making sure that nothing is:</p> <ul style="list-style-type: none"> <li>• thrown or tipped from height if it is likely to injure anyone</li> <li>• stored in such a way that its movement is likely to injure anyone.</li> </ul> <p>Minimise the risk of falling materials by:</p> <ul style="list-style-type: none"> <li>• keeping working platforms clear of loose materials</li> <li>• providing toe boards, solid barriers or brick guards at open edges</li> <li>• providing debris nets, fans or covered walkways, as appropriate, when scaffolding is put up in a public space.</li> </ul> <p>Where material needs to be dropped or removed from a platform, choose the most suitable method when planning for the work. This should make sure it can be done in a prepared and controlled way. An example of this would be specifying and using a chute into a receiving area that is clearly marked with warning signs, and secured to keep people out.</p> <p>If your workplace contains an area where there is a risk of someone being struck by a falling object or person, you must make sure it is clearly marked, and unauthorised people cannot access it.</p>
10.	<p><b>Contractors</b></p>

	Contractors who conduct work at height on TWHF premises should have their own Health and Safety Policies to ensure the risks to their staff, sub-contractors and TWHF occupants are adequately managed. They should conduct a suitable and sufficient risk assessment and work to approved method statements with adequate control measures to mitigate the risk of injury to themselves or others.
11.	<p><b>Limitations of this Policy</b></p> <p>The policy cannot anticipate all eventualities; therefore professional judgement should be used to identify the appropriate course of action needed to protect those who are vulnerable and/or at risk. This judgement should derive from multi-disciplinary team discussion rather than any one individual where possible.</p>
12.	<p><b>Appendices</b></p> <p>HSF 13.1 Ladder Register          HSF 13.2 Ladder Inspection Check list          HSG 13.1 Ladder Inspection          GRA 13.1 Working at Height          GRA 13.2 Mobile Scaffold Tower</p>

Date	Issue	Section	Changes
September 2020			No significant changes

