

Working at Height Policy

May 2022

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Version Control History

Version Number	Date of Change	Summary of Revisions Made
2		Publication delayed due to lack of feedback from CMT. No changes following scheduled review, only footer changed.
2.1	July 2016	Footer updated to reflect new template model. Role Title Changed: Vice Principal, Human Resources and Communication.
2.2	December 2018	Change of role to Quality Manager and other job titles to adhere to new structure.
2.3	April 2020	Change of footer to reflect version status, change of owner, lead author, lead editor and next review date. 5.1 Change Chief Operating Officer to Head of Human Resources and Organisational Development. 5.4 Insert – In conjunction with the Health, Safety and Wellbeing Advisor identify and arrange any training as is necessary.
2.4	May 2022	Para 1. Amend statement of death and injury. Para 3. Reference to the above. Insert statement defining what Working at Height does not include. Para 3.10 inclusion of Fall Restraint Systems.

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Working at Height Policy

1 Purpose

Falls from height remain a major cause of workplace deaths and injuries. The Work at Height Regulations (Amended) 2007 places a duty on the duty holder – "where work has to be carried out at height then the duty holder shall take suitable and sufficient measures to prevent, so far as reasonably practicable, any person falling a distance liable to cause personal injury".

The purpose of this policy is to ensure that the College complies with current Health and Legislation and to ensure that all Working at Height activities are conducted in a safe manner and do not expose employees, students, contractors and members of the public to unnecessary risks to their health and safety.

This document will outline responsibilities and how the risks from Work at Height will be managed.

2 Scope

- 2.1 This policy will apply to all Work at Height (WAH) activities authorised, controlled, supervised or carried out by or on behalf of the College, it also includes the use of access equipment whether it be used on College premises or out with College premises by employees, contractors or students.
- 2.2 It is applicable to all staff, contractors, students and users of the College facilities.
- 2.3 These regulations also apply to those who work at height providing instruction or leadership to one or more people engaged in caving or climbing by way of sport, recreation, team building or similar activities.

Note: WAH does not include walking up and down a permanent staircase in a building.

3 Definitions

3.1 Working at Height

As defined in Paragraph 1, Working at Height is work in any place, including a place at, above or below ground level where a person could be injured if they fell from that place. This can also include means of access and egress to a place of work.

For example: you are working at height if you:

- Are working on a ladder, platform, scaffold or a flat roof.
- Could fall through a fragile surface.
- Could fall into an opening in a floor or a hole in the ground.

The Work at Height regulations place no minimum height for which work at height considerations apply.

Work at height does **not** include a slip or a trip on the level, as a fall from height has to involve a fall from one level to a lower level, nor does it include walking up and down a permanent staircase in a building.

3.2 Work at Height Hierarchy of Control

- No work will be undertaken at height if it is safe and reasonably practicable to do it other than at height. **(Avoid)**
- Where work at height cannot be avoided, use of work equipment or other measures must be taken, so far as is reasonably practicable, to prevent any person falling a distance liable to cause personal injury. **(Prevent)**
- Collective control measures must be taken before individual control measures are considered ie construction of a safe work platform with adequate guardrails as opposed to an individual wearing a harness and lanyard. **(Prevent)**
- Control measures must be implemented to mitigate the distance and consequence of injury should a fall occur. **(Minimise)**

3.3 Access Equipment

Any equipment used to access places at height, this includes ladders or stepladders, kick stools, scaffold towers, platforms, podium steps, mobile elevating working platforms (MEWP's), ropes, lanyards, fall arrest/restraint systems etc.

3.4 Duty Holder

Duty holders (the person responsible for organising or planning the work) include – employers, self-employed and those in control of people at work, to the extent of their control.

3.5 Competent Person

This is a person with sufficient technical knowledge and adequate training to prevent danger or, where appropriate, injury, during his/her work.

3.6 Fragile Surfaces

A fragile surface is 'any surface liable to fail if any reasonably foreseeable load is applied to it', and this will include surfaces such as sky lights and other horizontal or angled glazing in roofs, asbestos cement sheets and other non-load bearing materials, light weight ceilings constructed over internal offices, etc.

3.7 Method Statement/Safe System of Work

A Method Statement/Safe System of Work is a document detailing how a particular process will be carried out. It should detail the possible dangers and risks associated with a particular part of a project or process and the methods of control to be established to show how the work will be managed safely. This will be supported by a risk assessment.

3.8 Permit to Work

This is a written authority signed and issued by an authorised and Competent Person to allow work at height. This authority specifies the appropriate safety precautions which have been taken.

3.9 Person in Charge

This person has accepted the Permit to Work and/or Method Statement for a particular task or work activity from a Competent Person.

3.10 Collective and Personal Control Measures

Collective control measures are a means of protecting a group of people ie construction of a safe working platform. Personal control measures involve an individual using a personal fall arrest harness with lanyard to mitigate the distance they could travel should a fall from height occur or fall restraint systems which prevent persons reaching zones where the risk of fall exists.

4 Key Principles

4.1 Avoid all Working at Height where reasonably practicable.

4.2 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. Careful consideration should be given to the selection and use of work equipment and any employees who have particular requirements, ie young workers, expectant mothers, persons with disabilities.

- 4.3 All 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 other members of staff, students, visitors, members of the public who may be in the vicinity, emergency situations, rescues and weather conditions.
- 4.4 Adequate control measures will be implemented to reduce the risks associated with identified hazards. All control measures will be communicated to the relevant persons, implemented and monitored by management.
- 4.5 Provision of adequate training for employees who are expected to Work at Height, as identified by the risk assessment and that supervision will be provided by a competent person.

Only competent contractors will be used by the College to carry out Work at Height on its behalf.

5 Responsibilities

The organisational structure for the implementation and management of the College's statutory health and safety duties are described in detail in the Health and Safety Policy.

General duties for Working at Height remain the same, but additional or specific duties relating to this policy are detailed on the next page.

5.1 Head of Human Resources and Organisational Development

It is the responsibility of the Head of Human Resources and Organisational Development to review and update this policy and ensure an EIA is carried out on this policy.

5.2 Managers

It is the responsibility of all managers to:

- Bring this policy to the attention of staff who they line manage.
- Ensure their staff avoid Work at Height where reasonably practicable.
- Ensure that there are suitable and sufficient risk assessments in place for Work at Height activities that cannot be avoided.
- Seek advice from the Health, Safety and Wellbeing Advisor with regards to Working at Height, this includes guidance on carrying out risk assessments, purchasing equipment and training and/or instruction.
- Ensure that staff that Work at Height are competent ie received appropriate training and/or instruction;

- Ensure that any outside agencies used to provide instruction or leadership to employees and/or students are competent to do so eg caving or climbing by way of sport, recreation, team building or similar activities.
- Ensuring that any accidents, incidents, near misses, dangerous occurrences are reported to the Health, Safety and Wellbeing Advisor.

5.3 Head of Estates

Head of Estates shall ensure:

- They bring this policy to the attention of contractors they engage.
- Contractors are competent to work at height ie request training records, risk assessments, method statements and safe systems of work.
- Work at Height equipment purchased for College use is suitable for its intended task by seeking advice from the Health, Safety and Wellbeing Advisor.
- That there is an up-to-date register of the College's Work at Height equipment eg ladders/stepladders, working platforms.
- That all College's Work at Height equipment is subject to regular inspection and/or maintenance and that these are recorded.
- No one accesses roofs without a Permit to Work being issued.
- That Work at Height under their control takes into account weather conditions that could compromise health and safety.
- The risks from fragile surfaces are properly controlled.

5.4 Human Resources

Human Resources will:

- Advise and support managers on disciplinary proceedings when required.
- Refer staff to the College Occupational Health Provider when necessary.
- In conjunction with the Health, Safety and Wellbeing Advisor identify and arrange any training as is necessary.

5.5 Occupational Health Provider

The College Occupational Health Provider will:

- Carry out health checks to employees that Work at Height who are referred by HR.

5.6 Health, Safety and Wellbeing Advisor

The Health, Safety and Wellbeing Advisor will:

- Investigate reported Work at Height related accidents.
- Inform Senior Management Team of reported Work at Height accidents accordingly and report them to the HSE when appropriate.
- Advise as necessary on the suitability of Work at Height risk assessments, both College and contractors'.
- Advise on suitable Work at Height equipment for College activities.
- Advise on appropriate Work at Height training for College employees.
- Deliver Work at Height training when a need is identified and is within his/her area of competence.
- Stop any Work at Height in which there is a risk of serious and imminent danger, either to the person carrying out the activity or others.

5.7 All College Staff

It is the responsibility of all College staff to ensure that they:

- Do **not** carry out any Work at Height unless there is a risk assessment in place.
- Do **not** carry out Work at Height activities unless they have received appropriate training and approval to work at height.
- Do **not** use any equipment unless they have received appropriate training and/or instructions.
- Do **not** use ladders/stepladders unless the:
 - Risk assessment deems them suitable for the task.
 - Work is of a short duration (less than 30 minutes).
 - Work is of a light nature (Handling material less than 10kg).
 - Environment means ladders or stepladders can be used in a safe manner.

It is the responsibility of all College staff to ensure that they **do**:

- Comply with this policy. In cases of staff members breaching this policy then College disciplinary procedures may be followed.
- Use any equipment they have been provided with as per any training and/or instructions they have received.
- Inspect any equipment supplied prior to use and ensure that it is in a safe condition.
- Report any defective equipment to their line manager.
- Report any accidents, incidents, near misses, dangerous occurrences or breaches of this policy to their line manager.

5.8 Contractors and their Staff

Contractors and their staff must:

- Comply with this Policy.
- Report any accidents, incidents, near misses, dangerous occurrences to the Head of Estates in the first instance.
- Not access any roofs at College premises without seeking permission from the Duty Holder.
- Have risk assessments and method statements for work at height activities, however they can use their own format, but they must meet legal requirements.

5.9 Quality Manager

Quality approval check of the policy is the responsibility of the Quality Manager who will arrange for the policy to be posted on the intranet.

6 Linked Policies/Related Documents

Health and Safety Policy
Staff Disciplinary Procedure

7 Relevant Legislation

Health and Safety at Work etc Act 1974
Management of Health and Safety at Work Regulations 1999
Work at Height Regulations 2005
Provision and Use of Work Equipment Regulations 1998
Lifting Operation Lifting Equipment Regulations 1998
The Construction (Design and Management) Regulations 2015
Control of Asbestos Regulations 2012