

Work at Height UHL Policy

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REVIEW DATES AND DETAILS OF CHANGES MADE DURING THE REVIEW

October 2019: Policy subject to full re-write including the addition of the Working at Height Equipment Guideline (Safe working procedures) and Permit system included in the appendix

May 2023: Update on Board Lead / Formatting of Key Words section / Formatting of Abbreviations section and addition of RIDDOR / Role Titles / Addition of 4.6.1(i), (j) / 4.7 removal of Estates Compliance Team / 5.1.4 “will” replaced with “may” and addition of “designated high risk” / 5.2.2(h) added / 5.2.6(c) removed / Policy Monitoring table updated / Appendix I – removal of Compliance Team in header, additions to k) / Appendix II – grammatical and spelling corrections / Appendix II Monitoring table updated / Appendix II Supporting Documentation updated / Appendix III clarified when permit to be issued

KEY WORDS:

Ladders / MEWPS / Permit to Work (P2W) / Podium Steps / Risk Assessment / Scaffolding / Stepladders / Towers / WAH / Work at Height

1 INTRODUCTION AND OVERVIEW

- 1.1** The University Hospitals of Leicester NHS Trust recognises its responsibilities and duties under the Health and Safety at Work Act, etc. 1974 to provide a healthy and safe environment for all employees, contractors, and member of the public.
- 1.2** This document sets out the University Hospitals of Leicester (UHL) NHS Trusts Policy for the management, supervision, and control of work at height activities across all UHL sites as required by the Work at Height Regulation 2005 (WAH05).
- 1.3** The Work at Height Regulations 2005 is in place to protect staff and others against risks to their health while working at height. The Regulations apply to all work at height, where there is risk of a fall liable to cause personal injury. They place duties on employers, property owners and those who control any work at height activity (such as Estates and Facilities Managers or Project Managers who may contract others to work at height).

As part of the Regulations, the Trust must ensure that:

- a) All work at height is properly planned and organised;
 - b) Those involved in work at height are competent;
 - c) The risks from work at height are assessed, and appropriate work equipment is selected and used;
 - d) The risks of working on or near fragile surfaces are properly managed;
 - e) The equipment used for work at height is properly inspected and maintained
- 1.4** Work at height, is defined as 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.

2 POLICY SCOPE

- 2.1** This policy is applicable to all employees of the Trust (including temporary, agency and volunteer staff) and all contractors engaged by the Trust who are involved in the management, maintenance, refurbishment, construction, design, upgrading, in all premises owned and operated by UHL who undertake work at height as defined in the Work at Height Regulations 2005.
- 2.2** Those tasked with working at height or managing work at height activities are required, under the Work at Height Regulations 2005, to be deemed competent. They are required to have the necessary skills, knowledge, experience, and training (SKET) to perform the tasks safely.
- 2.3** In the case of low-risk, short duration tasks involving ladders / stepladders, competence requirements may be no more than making sure employees receive instruction on how to use the equipment safely (e.g., how to tie a ladder properly, how to check for defects etc.) and appropriate training. Training often takes place on the job; it does not always take place in a classroom.

- 2.4** When a more technical level of competence is required, for example drawing up a plan for assembling a complex scaffold, existing training and certification schemes drawn up by trade associations and industry is one way to help demonstrate competence.
- 2.5** Persons responsible for developing Work at Height related guidance or procedures must ensure that it complies with policy.

3 DEFINITIONS AND ABBREVIATIONS

Competent Person

A competent person is not someone who simply has the competence to carry out a particular task safely. In general terms, the definition of a competent person is someone who has the necessary skills, experience, and knowledge to manage health and safety.

DATIX ®

The incident reporting platform utilised by the Trust

SKET

Skills, Knowledge, Experience and Training; a means to determine competence

Work at Height (WAH)

Work in any place where, if precautions were not taken; a person could fall a distance liable to cause personal injury.

You are working at height if you:

- a) work above ground/floor level
- b) could fall from an edge, through an opening or fragile surface or
- c) could fall from ground level into an opening in a floor or a hole in the ground

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

IM&T

Information Management and Technology

RIDDOR

The Reporting of Injuries, Disease and Dangerous Occurrences Regulations

Permit to Work

A permit-to-work system is a formal written system used to control certain types of work that are potentially hazardous. A permit-to-work is a document which specifies the work to be done and the precautions to be taken.

4 ROLES

The Trust Health and Safety Policy A17/2002 define roles and responsibilities for all staff employed by the Trust. Where “Work at Height” activities are identified, the additional responsibilities for the effective management of these risks are outlined below.

4.1 Trust Board

The Trust Board has overall accountability for the activities of the organisation.

The board shall ensure that they receive appropriate assurances in respect of Compliance with the Health and Safety at Work etc. Act 1974 and supporting legislation. It follows, therefore, that the overall responsibility for the management of Working at Height will rest with the Trust Board. The Trust Board should ensure that it receives appropriate assurance of compliance with Trust policy, legislation, codes of practice and guidance documents

4.2 Chief Executive

The Chief Executive has overall responsibility for ensuring that systems and arrangements are in place to ensure that all work at height activities undertaken by directly employed staff and contractors are done so safely. This responsibility is delegated to the Senior Management in each Clinical Management Group (CMG) / Corporate Directorate

4.3 Director of Estates, Facilities and Sustainability (DoEFS)

The DoEFS has delegated responsibility for work at height activities undertaken by Estates and Facilities staff and their appointed contractors working on Trust premises. This includes Capital Project Contractors.

4.4 Clinical Management Group (CMG) / Corporate Directorate Managers

4.4.1 All Managers play a fundamental role in the management of Health and Safety in the areas under their control. This includes any activity classified as working at height, as defined in the Work at Height Regulations and this Policy.

4.4.2 The main work at height duties of all Managers is to:

- a) Ensure that every effort is made to avoid working at height;
- b) Ensure that, where working at height cannot be avoided, a suitable and sufficient risk assessment has been undertaken and documented;
- c) Ensure employees and their representatives are consulted when assessing the risks connected with working at heights;
- d) Provide suitable work equipment or other measures to prevent falls where work at height cannot be avoided;
- e) Ensure all equipment utilised for working at height is appropriately selected / specified for the type of work being undertaken and that is thoroughly inspected and maintained;
- f) Ensure that prior to working at height, a written safe system of work, including emergency and rescue procedures, has been developed and where necessary, a permit to work issued;
- g) Ensure that all staff involved in working at heights are competent to safely undertake what is expected of them;
- h) Ensure that all staff involved in working at height are aware of this policy, understand its content and comply with local procedures and safe systems of work;
- i) Ensure all staff that work at height are fit to do so;
- j) Ensure that all staff who work at height and those who issue permits to work have appropriate information, instruction, training, and supervision;
- k) Ensure all contractors employed are competent to work at height and are appropriately managed when on site.

4.5 Line Managers and Supervisors who issue permits to work (P2W)

4.5.1 This issue and management of WAH permits are controlled by the Estates and Facilities (E&F) Directorate.

4.5.2 Those issuing and controlling WAH access and Permits are required to:

- a) Assess all associated risks involved in working at height, using the Trust's Risk Assessment form in accordance with the Trust Risk Management Strategy & Policy;
- b) Develop a safe system of work;
- c) Ensure that all necessary precautions, including emergency procedures are taken;
- d) Check safety at each stage of the work;
- e) Act upon any report of an activity or defect likely to endanger safety;
- f) Check the workplace before it is used;
- g) Check work equipment installed or assembled prior to use;
- h) Control the issue of the permit to work and its cancellation;
- i) Manage contractors while they are on site.

4.6 Trust Employees, Contractors, Third Parties Employees and Volunteers

4.6.1 All staff have a duty of care to themselves, patients, visitors, and other members of staff and will ensure that when engaged to undertake any work at height activity they:

- a) Assist and contribute with the assessment of risks;
- b) Comply with any safe system of work developed through risk assessment, defined control measures and any requirements of a permit to work;
- c) Use any safety equipment supplied and inspecting prior to use;
- d) Follow training and instruction provided;
- e) Inform their managers if they suspect that the system of work in place is ineffective or inadequate;
- f) Report any activity (unsafe acts) or defect (unsafe condition) likely to endanger their safety or the safety of others;
- g) Report all incidents (including near misses) and any defects in equipment on DATIX®
- h) Inform the management if they suspect they may not be fit enough to work at height.
- i) Ensure they never enter restricted areas, use or access any work at height equipment without the necessary authority and training.
- j) Do not leave any work at height equipment unattended and ensure that the working area is left clear / clean when the work has been completed

4.7 Health and Safety Services

4.7.1 The Health and Safety Services team will:

- a) Ensure that competent advice and information on working at heights is available;
- b) Provide advice and assistance with 'Work at Height' risk assessment

where required / requested;

- c) Provide advice and guidance to managers and staff on their duties in relation the Work at Height Regulations;
- d) Provide advice on the suitability of any work system or equipment intended to be used for working at height;
- e) Investigate all RIDDOR reportable falls from height incidents;
- f) Monitor and Audit 'Work at Height' activity to inform policy, procedure, and best practice.

5. POLICY IMPLEMENTATION AND ASSOCIATED

5. 1 In the event that working at heights cannot be avoided, a suitable and sufficient risk assessment must be undertaken, and a written safe system of work developed including the provision of emergency procedures.

5.1.2 See Appendix 1. for the Working at Height Risk Assessment form

5.1.3 See Appendix 2. for the Safe Working Procedures document

5.1.4 A permit to work at height may be required where access is to be gained to any designated high risk roof area. In addition, where planned work involves the use of cradles or cherry pickers or other mechanical means of working at height such as during window cleaning, a Working at Heights Permit will be required. See Appendix 3.

5.2 Assessing the risks

5.2.1 When assessing the risks, use must be made of all the information available about the work to be carried out. All foreseeable hazards and risks must be considered in advance.

5.2.2 Work at height can include, but is not exclusively limited to:

- a) Working at ground level adjacent to an excavation;
- b) Working on roofs;
- c) Working from access equipment;
- d) Working from ropes;
- e) Working from a ladder / stepladder;
- f) Working from a podium step or kick-stool;
- g) Going into a roof void where there is a non-load bearing ceiling below.
- h) Working on or from (loading / unloading) vehicles

5.2.3 When conducting the WAH Risk assessment consideration should be given to the following when allocating any risk rating:

- a) The work activity(ies) being planned and undertaken;
- b) The frequency of access;
- c) The duration of the work(s);
- d) The location in relation to the presence of hazards such as open excavations, overhead services etc.

- e) The working environment regarding weather or lighting;
- f) Safe means of access and egress, including restrictions to those not authorised;
- g) Lone working;
- h) Condition and stability of work surfaces such as fragile materials, surface contamination, ground conditions, weight restrictions etc.;
- i) Physical capabilities of the workers such as pregnancy or vertigo sufferers
- j) The equipment to be utilised, its suitability for the task(s) and its maintenance and inspection regime;
- k) Impact from overhead services, projections or falling objects;
- l) The method and means of transporting tools, materials, and substances from ground level to the working level.

5.2.4 The risk assessment must be recorded on a Trust risk assessment form (Appendix 1) and undertaken by a person who is competent to do so. This must be signed by the assessor and by the manager or head of department. Managers must keep a copy of the assessment form in their department.

5.2.5 In gathering information for an assessment, managers may need expert advice.

5.2.6 Information on work at heights is available from the following sources:

- a) HSE website at <http://www.hse.gov>
- b) The Health and Safety Service Team healthandsafetyteam@uhl-tr.nhs.uk

5.3 Developing a Safe System of Work

5.3.1 The information gathered during the risk assessment process is essential in developing a documented safe system of work document. This provides vital information and instruction to those expected to carry out the work(s).

5.3.2 This document will detail all the risk control measures and the reasons for their application, e.g., the need to use ladder fixing points. It will also detail, where necessary:

- a) The means for preventing unauthorised access to the area underneath the work being carried out;
- b) Any supervision that may be necessary;
- c) Any weather conditions that workers may be exposed to e.g., icy roofs, slippery surfaces in the rain, wind, etc.;
- d) Any emergency or rescue conditions required on site. It is not acceptable to rely solely on the emergency services, this needs to be covered in the risk assessment and planned prior to the work being carried out

Note: Fall arrest equipment should be the last in the hierarchy of control. Collective protection measures, e.g., guard rails, should be deployed in the first instance rather than personal protection.

6 EDUCATION AND TRAINING REQUIREMENTS

- 6.1 The Trust has a duty under the Health & Safety at Work, etc. Act to provide staff with information, instruction, and training appropriate to their role. Managers must identify the training needs for their staff group. It is important that staff receive the correct type and amount of information, instruction, and training to ensure competence for the duties undertaken.
- 6.2 Information, instruction, and training must be delivered in such a way that it is received and understood by the person receiving it:
- a) Information may be written or verbal and may include booklets, posters, signage, risk assessment findings, location of policies, induction packs, etc. Information provided with equipment must be readily available to staff that are expected to use the equipment;
 - b) Instruction may be written or verbal. Examples include safe operating procedures, safe systems of work and on the job 'show-and-tell' type instruction. Instructions will include actions to be taken by staff in the event of an emergency;
 - c) Training will be required for all Trust operatives required to work at height and managers or supervisors who issue permits to work. This will enable them to be competent and confident with procedures, legislation and equipment associated with work at height.
- 6.3 Training may include the use of ladders / stepladders, erection and use of scaffold or use of a Mobile Elevated Work Platform (MEWP), the use of harnesses and lanyards and escape plans.
- 6.4 Identified staff must have working at height and associated refresher training within a three-year period or sooner if risk assessment or safety data indicates that it is necessary.
- 6.5 Supervisors and Managers who direct staff and/or engage contractors for work at height activities should be suitably trained to recognise the hazards and control measures presented by work at height activities.
- 6.6 Supervisors, Managers, and designated staff who issue work at height permits to work should have received suitable training.

7 PROCESS FOR MONITORING COMPLIANCE

- 7.1 All Policies must include details of audit standards or key performance indicators that will be used for monitoring compliance and effectiveness and the frequency of monitoring / audit. These must be set out in the Policy Monitoring table set out below.

POLICY MONITORING TABLE

Element to be monitored	Lead	Tool	Frequency	Reporting arrangements Who or what committee will the completed report go to.
Work at Height Risk Assessment	Manager initiating work at height	Audit of paperwork (representative sample)	Annually	Estates and Facilities Health & Safety Group
Development of Safe Systems of Work / SOP for working at height	Manager initiating work at height	Audit of paperwork (representative sample)	Annually	Estates and Facilities Health & Safety Group
Incidents reported on DATIX® arising from working at height	Health and Safety Team	DATIX® Reports DATIX® Dashboards	Annually Quarterly	UHL H&S Committee
Permit to Work	Authorised Person(s) (Estates and Facilities)	Spot Check Audit of Permit Books	Ad hoc Annually	Estates and Facilities Health & Safety Group
Training Needs Analysis	Line Managers	Training Matrix HELM	Annual	Estates and Facilities Health & Safety Group
Training Competencies	Line Managers	Training Matrix HELM	Every 3 years	Estates and Facilities Health & Safety Group

8 EQUALITY IMPACT ASSESSMENT

- 8.1 The Trust recognises the diversity of the local community it serves. Our aim therefore is to provide a safe environment free from discrimination and treat all individuals fairly with dignity and appropriately according to their needs.
- 8.2 As part of its development, this policy and its impact on equality have been reviewed and no detriment was identified.
- 8.3 A worker may be found to be unsuitable for work at heights after following due process and the standards within this policy. These standards meet the criteria in the Equality Act in that they are a proportionate means of achieving the legitimate aim of the ensuring safety of the worker and others.

9 SUPPORTING REFERENCES, EVIDENCE BASE AND RELATED POLICIES

Act of Parliament 1974 The Health and Safety at Work etc. Act 1974 (c. 37)

HSE Books 2014 INDG401 (rev 2) Working at Height: a brief guide

HSE Books 2014 INDG455 Using ladders and stepladders safely: A brief guide Leaflet

HSE Books 2012 (4th Edition) HSG33 Health and Safety in Roof Work

Statutory Instruments (SI) 2005 No.735 The Work at Height Regulations 2005

Statutory Instruments (SI) 1998 No. 2307 The Lifting Operations and Lifting Equipment Regulations 1998

Statutory Instruments (SI) 1998 No 2306 The Provision or Work Equipment Regulations 1998

Statutory Instrument (SI) 2015 No 51 The Construction (Design and Management) Regulations 2015

Statutory Instruments (SI) 2013 No.1471 The Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013

Statutory Instruments (SI) 1992 No 3004 The Workplace (Health, Safety and Welfare) Regulations 1992

UHL Health and Safety Policy A17/2002


UHL Risk Management Policy A12/2002

UHL Management of Contractors Policy B24/2004

10 PROCESS FOR VERSION CONTROL, DOCUMENT ARCHIVING AND REVIEW

- 10.1 The updated version of the Policy will be uploaded and available through INsite Documents and the on the Trust's externally accessible Freedom of Information publication scheme. It will be archived through the Trust's PAGL system.
- 10.2 It should be noted that paper copies may not be the latest up-to-date version.

- 10.3 This policy and associated documentation will be reviewed every 3 years or sooner as deemed necessary due to changes in Legislation, Healthcare guidance, local practice, responsibilities, or arrangements.
- 10.4 Review will be conducted by the Estates and Facilities Head of Compliance, Estates Managers, Specialist contractors (where applicable), the Health and Safety Team and all members of the UHL H&S Committee before submission to the Policy and Guidelines Committee.
- 10.5 The Director of Estates and Facilities will be responsible for ensuring all effected Estates and Facilities staff read and fully understand the policy and is read in conjunction with the Control of Contractors Policy.
- 10.7 Contractors working at height on Trust premises are to be given a copy of the policy and relevant safe working procedures which they are to sign for as proof of receipt.

Work At Height Risk Assessment Form				University Hospitals of Leicester 	
CMG / Directorate		Dept:		Ward/Team	
Please refer to the Trusts Safe Working Procedures Guideline in Appendix 2 of the Work at Height Policy / or seek guidance from the Health and Safety Services Team before completing this risk assessment.					

The activity/operation			
Describe the work at height activity/operation being assessed:			
What are the foreseeable consequences of a fall? (No injury, minor injury, fatality, etc.)			
	Assessment factor	Yes	No
a)	Can the activity/operation be done in a way that avoids work at height?		
b)	Can the work be carried out from a suitable existing place of work?		
c)	Does the existing workplace provide a means of preventing falls?		
d)	Does the existing workplace have suitable safe access/egress?		
e)	Does the work require the use of two hands?		
f)	Does the work require pushing or pulling?		
g)	Is the activity/operation repetitive in nature?		
h)	Is the activity/operation of short duration (less than 10 mins)?		
i)	Will the activity/operation be supervised?		
j)	Does the task require more than one person?		
k)	Does the task require tools, equipment and/or materials and substances to be raised to the place of work?		
l)	Will the work take place where falling objects could injure passers-by?		
m)	Are the ground conditions suitable for a scaffold or other access equipment?		
n)	Are there any power cables or other overhead restrictions?		
o)	Are there suitable anchorage points for a ladder?		
p)	Can the risk of falling be eliminated?		
q)	Can the distance of fall be minimised?		
r)	Can the consequences of a fall from height be minimised?		
s)	Will inclement weather affect the safety of the job (high wind, rain, snow, etc.)?		
t)	What is the maximum distance of fall (in metres)?		
u)	If the activity is just access or egress (e.g., getting onto a raised storage area) what is the distance (in metres) to be travelled?		

Access equipment	
Using the information above, select the equipment that should be used for the activity/operation being assessed.	
<input type="checkbox"/> MEWP <input type="checkbox"/> Independent scaffold <input type="checkbox"/> Tower scaffold <input type="checkbox"/> Easidec	Briefly explain why this equipment has been selected:

<input type="checkbox"/> Ladder <input type="checkbox"/> Stepladder <input type="checkbox"/> Podium step / kick-stool <input type="checkbox"/> Fall arrest system <input type="checkbox"/> Work positioning equipment <input type="checkbox"/> Other (specify opposite)	
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Instruction, training, and procedures		
Assessment factor	Yes	No
Is the proposed equipment adequate for the foreseeable loading of people, equipment, and materials?		
Have employees been trained or instructed in the use of the selected equipment?		
If fall arrest equipment is to be used, are there emergency/rescue procedures in place?		
Does the selected equipment require formal inspection periodically and before use?		
Who will carry out the above inspections? (Provide name, job title and contact no.)		

Summary and further/remedial actions

Likelihood and severity table

Severity Consequence / Likelihood	1 Insignificant No injury noticeable First Aid not required	2 Minor Injury requiring treatment, e.g., First Aid	3 Moderate Lost time injury or illness RIDDOR reportable > 3 days absence	4 Major Fractures, amputation, extensive injury RIDDOR reportable	5 Extreme Death
Rare = 1 < 0.1%	1 LOW	2 LOW	3 LOW	4 LOW	5 LOW
Unlikely = 2 0.1-1%	2 LOW	4 LOW	6 LOW	8 MOD	10 MOD
Possible = 3 1-10%	3 LOW	6 LOW	9 MOD	12 MOD	15 HIGH
= 4 10-50%	4 LOW	8 MOD	12 MOD	16 HIGH	20 HIGH
Almost Certain = 5 > 50%	5 LOW	10 MOD	15 HIGH	20 HIGH	25 EXTREME

With all the above control measures in place this activity/operation is considered to be (please circle):
LOW MODERATE HIGH EXTREME

Remedial actions or additional control measures required	Date for completion

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Assessor(s)'s name:	Assessor(s)'s signature:	Date:
Manager must sign below to accept the assessment and ensure that remedial actions are implemented.		
Line Manager's name:	Line Manager's signature:	Date:

Date for review	Date of review	Reviewed by (name)	Comments

1. Introduction and Who Guideline applies to

- 1.1 Working at height can be a high-risk activity and falls from height still contribute to one of the largest causes of accidental death at work so it is essential that suitable and sufficient controls are implemented to mitigate the risk of working at height if it cannot be avoided.
- 1.2 Proper safety standards are essential for all working at height and the nature of the precautions required must be assessed for each individual task.
- 1.3 This guidance provides good practice advice relevant to specific access equipment which may be identified by risk assessment and subsequently used on trust premises.
- 1.4 Much of this guideline is aimed at Estates and Facilities staff but is relevant to all Trust staff and contractors engaged by the Trust who frequently or infrequently use working at height equipment as part of their undertaking.

2.0 Guideline Standards and Procedures

2.1 Safe working for the use of Steps / Stepladders for standard tasks including but not limited to:

- a) Cleaning high level surfaces above arm's length
- b) Changing bed/privacy/shower curtains
- c) Changing lamps
- d) Cleaning vent grilles
- e) Removing/fixing vent grilles
- f) Repairing luminaires
- g) Removing/fitting ceiling tiles
- h) Cleaning A/C Unit filters and louvers
- i) Removing/fitting Fire Alarm detectors
- j) Accessing patient records / stock items

NOTE: Max Height for a Standard task is 2.7mtrs from floor level.

NOTE: Max duration of standard task is

30mins (for continuous work on the steps)

2.1.1 Safe working procedures to be followed:

- a) Assess the task; is it a standard or non-standard task?
(i.e., is it suitable to be carried out on a pair of steps? Consider risk and duration).

- b) All staff using steps must have received formal 'Working at Height' training within the last 3 years or can demonstrate competence
- c) inspect the steps; make sure they have an in-date inspection label with a unique identification reference linked to the equipment register / asset list.
- d) Ensure the steps are in good condition? Undertake a pre use check as per your training.
- e) Place steps on level ground, open to maximum span.
- f) Check all four stepladder feet are in contact with the ground and the steps are level.
- g) Only carry light materials and tools
- h) Do not overreach
- i) Ensure any locking devices are engaged
- j) Position the stepladder to face the work activity and not side on.
- k) Where side-on loadings cannot be avoided, you should prevent the steps from tipping over, e.g., by tying the steps. Otherwise, use a more suitable type of access equipment;
- l) Place warning signs around you or have safety men assisting you.
- m) Do not place the steps where you ~~have to~~ (must) lean over to work,
- n) Always keep 3 points of contact with the steps i.e. Two feet one hand.
When both hands need to be free keep two feet on the same step and the body (knees and/or chest) supported by the stepladder to maintain 3 points of contact.
- o) Do not go above 3 rungs from the top. Unless fitted with a working platform and guardrail system
- p) Do not leave tools on the platform part.
- q) Carry out the task in a safe manner
- r) Tidy up after completion
- s) Inspect steps for signs of damage after usage. Report any issues. If damaged removed from operation and inform your manager immediately.
- t) Replace steps in the correct and secure place never leave them where public can access them.
- u) Avoid damaging the steps when storing.

2.1.2 Task considered “non-standard” when utilising steps / stepladders include:

- a) Tasks over 2.7mtrs from the floor level
- b) Tasks with a duration of longer than 30mins
- c) Non-standard tasks are not restricted to the above.

NOTE: ALL Non-standard tasks are to be individually Risk Assessed.

NOTE: Alternative methods should be given every consideration.

NOTE: All Non-Standard tasks need the permission of the Manager authorising the activity before commencing work

2.2 Safe working procedures for the use of Ladders for all tasks

NOTE: Ladders are ideally only to be used for access purposes, every effort should be made to use other means for the task.

- a) Assess the task, ensure it is within the HSE INDG455 publication guidelines for working from a ladder
- b) All staff using Ladders must have received suitable training, within the last 3 years or can demonstrate competence.
- c) A documented risk assessment **MUST** be carried out before any use of a ladder.
- d) Inspect the Ladder, check for an in-date inspection identification tag.
- e) Ensure that the ladder is suitable for the task; make sure it is long enough and fit for purpose.
- f) Inspect the ladder and **DO NOT** use if any rungs have sign of damage if it is warped or showing signs of fatigue or cracking.
- g) The number of staff required to erect a ladder will be defined by risk assessment and determined by length and weight.
- h) The ladder must be positioned so the task does not require the operative to lean at all outside the width of the ladder. If this cannot be achieved, then another means of access is required, and a ladder is not suitable.
- i) Display warning signs around the position.
- j) Make sure the ground is level and firm.
- k) The ladder must have a 4:1 ratio, up 4 and out 1.
- l) Avoid holding items while climbing or descending, use a tool belt or similar
- m) **DO NOT** work of the top three rungs.
- n) **DO NOT** work within 6m horizontally of overhead power lines.
Maintain 3 points of contact whilst climbing and if possible, carrying out the task, (both feet and a hand) only deviate from this for very brief times. When both hands need to be free keep two feet on the same step and the body (knees and/or chest) supported by the ladder to maintain 3 points of contact.
- o) **DO NOT** try to move or extend ladders while standing on the rungs;
- p) A leaning ladder must be secured to prevent slipping. Footing the ladder is only for short duration tasks.
- q) When the ladder is for access, it should extend past the landing point at least 3 rungs (1mtr) and be tied off.
- r) When the task is complete the ladder must be cleaned and stowed safely away and secure place never leave them where public can access them.

2.3 Safe working procedures for the use of Tower Scaffolds for all tasks

NOTE: Tower Scaffolds are only to be used for after a task specific Risk Assessment has been undertaken by a competent person.

- a) Tower scaffolds can only be erected by officially trained and competent persons. A list of staff trained for this is available in the Estates and Facilities office.
- b) All staff using tower scaffolds must have received formal working at height training within the last 3 years.
- c) Even though all towers are erected by trained and approved personnel, never use a tower if you feel it is unsafe. If you spot an unsafe condition then report this to Estates Management and ensure that the tower is not used until the issue has been resolved.
- d) Only use a safe access to the tower, this must be on the inside of the tower by an appropriately designed built-in ladder.
- e) A task specific Risk Assessment needs to be undertaken for every task requiring the use of a tower scaffold.
- f) All tasks require warning signs positioned to alert persons of the potential of any falling items causing harm to people.
- g) Where possible and practicable erect barriers at ground level to prevent people from walking into the tower or work area;
- h) Remove or board over access ladders to prevent unauthorised access if it is to remain in position unattended.

Never use a tower –

- a) as a support for ladders, trestles, or other access equipment;
- b) in weather conditions which are likely to make it unstable;
- c) with broken or missing parts;
- d) with incompatible component;
- e) on uneven / unsuitable ground.

2.4 Safe working procedure for the use of Mobile Elevating Work Platforms (MEWP)

NOTE; A “Cherry Picker” or any other MEWP are only to be used for after a task specific Risk Assessment has been undertaken by a competent person.

- a) A MEWP can only be operated by officially trained persons, who are familiar with it. A list of staff trained for this is available in the Estates offices.
- b) At all times follow your training
- c) All staff using a MEWP must have received formal working at height training, and specific instruction for hydraulic platform working, including the use of restraint harnesses.
- d) A task specific Risk Assessment needs to be undertaken for every task requiring the use of a MEWP
- e) All tasks require warning signs positioned to alert persons of the potential of any falling items causing harm to people.
- f) Where possible and practicable erect barriers at ground level to prevent people from walking into the or work area.
- g) A fully trained person must remain on the ground to initiate a manual lowering of the platform if required, they must be fully trained in this operation.
- h) An emergency rescue plan must be part of the Working at Height Risk Assessment.

2.5 Safe working procedures for tasks on Unprotected Flat Roofs

NOTE: All unprotected Flat roofs are restricted access, estates staff only.

NOTE: All other roof types are only to be accessed by specialist contractors for specific tasks.

Procedures for flat roofs with purpose made safety handrails fitted;

- a) Flat roofs can only be accessed by staff who have received official Working at Height Training within the last 3 years.
- b) The handrails are designed to prevent falls; under no circumstances should they be used for standing on.
- c) No person should cross the handrail barrier and work from the 'other side'
- d) No ropes or lifting equipment should be attached to the barriers.
- e) Any alterations to the handrails are to be by specialist contractors only and subject to a specific Risk Assessment.
- f) For flat roofs where there are possibilities of contamination from fume discharge a Permit to Work is required. Full knowledge of the system involved is required. Notice must be given to the users for routine tasks; no access to the area is to be made until the discharge is made 'safe,' even in emergencies.
- g) For tasks within 2mtrs of skylights or a similar 'Fragile roof structure' a specific Risk Assessment must be undertaken.
- h) For any flat roofs that do not have guard rails fitted operatives must not go within 2 metres of the edge, and all tasks require a specific Risk Assessment and Safe Working Method, no access is allowed when there are strong winds or adverse weather conditions. As a result of the risk assessment and method statement, alternative means of protection must be put in place.

2.6 Safe working procedures on Fixed Vertical Ladders for Access

Note; All Fixed vertical ladders are restricted access, estates staff only (or estates appointed contractors).

Guidance for FVL usage;

- a) Before using the ladder, the condition needs to be checked, loose fixing, corrosion, damaged rungs, or hoops must be reported to Estates Maintenance management.
- b) Never use a FVL or allow others to if you feel it is unsafe to do so.
- c) Both hands are to be used to climb these ladders
- d) All tools and equipment unless on a tool belt need to be hoisted and not carried up the ladder.
- e) Extreme care needs to be taken when using these ladders in cold and icy conditions, gloves are recommended and available
- f) Operatives must not stand directly underneath while someone is climbing or descending the ladder.
- g) All FVL's that are accessible to non-estates staff need to have suitable locking devices to prevent unauthorised use of the ladder.

3.0 Education and Training

3.1 No specific education or training is required to implement this guideline however any person expected to utilise work at height equipment should hold the relevant qualification(s) / certification, outlined below, for that equipment and be able to demonstrate competence in their use.

- a) Ladder / Stepladder – practical and theoretical face to face training via toolbox talk or similar medium delivered by a competent person
- b) Mobile Scaffold tower (or similar) – PASMA (Prefabricated Access Suppliers' & Manufacturers' Association) accredited training, or equivalent, specific to the equipment in use
- c) Powered Access / MEWPS / “Cherry Pickers” – IPAF (International Powered Access Federation) accredited training, or equivalent, specific to the equipment in use
- d) Fixed Scaffolding - CISRS (Construction Industry Scaffolders Record Scheme) accredited training, or equivalent, specific to the equipment in use
- e) Rope Access – IRATA (Industrial Rope Access Trade Association) accredited training, or equivalent, specific to the type of access and equipment in use

4. Monitoring Compliance

What will be measured to monitor compliance	How will compliance be monitored	Monitoring Lead	Frequency	Reporting arrangements
Work at Height Risk Assessment	Audit of paperwork	Manager initiating	Annually	Estates and Facilities H&S Committee
Permit to Work	Authorised Person(s) (Estates and Facilities)	Spot Check Audit of Permit Books	Ad hoc Annually	Estates and Facilities H&S Committee
Training Competencies	Line Managers	Training Matrix HELM	Annually	Estates and Facilities H&S Committee

5. Supporting References (maximum of 3)

The Work at Height Regulations 2005 SI 2005/735 The Stationery Office 2005
www.legislation.gov.uk

Working at Height: A brief guide Leaflet INDG401(rev2), published 01/14

Safe use of Ladders and Stepladders: A brief guide, guidance Document LA455

<https://ladderassociation.org.uk/wp-content/uploads/2021/07/LA455-Safe-Use-of-Ladders-and-Stepladders-A-brief-guide.pdf>

6. Key Words

Cherry Picker / Ladders / Stepladders MEWP/ Roof work Scaffold Steps / Vertical ladder / WAH / Work at height

CONTACT AND REVIEW DETAILS	
Guideline Lead (Name and Title) Michael Blair Michael - Head of Compliance	Executive Lead Michael Simpson – Director of Estates, Facilities and Sustainability
Details of Changes made during review: New Guideline	
May 2023 – Grammatical errors updated throughout Monitoring table updated Supporting Documentation updated	

Appendix 3 Work at Height Permit to Work (Estates and Facilities)

This permit is to be completed when carrying out designated high risk working at height , such as unprotected roofs / access equipment / abseiling etc. or any situation as deemed necessary at roof level,

Site / Building:		Location (exact):	
Work Order #No		Contractor:	
Authorised Person (UHL):(print name)		Designation:	
Valid from (time / date)		Valid to (time / date)	

(To be signed by UHL authorised person (AP) and person in charge (PIC) or Competent Person (CP) undertaking the work)

Details of precautions to be considered		Answer	Sign	Sign
		Yes / No / N/A	AP	PIC/CP
1	Have alternative work methods have been considered to eliminate the working at height activity?			
2	Work has been adequately risk assessed and sufficient control measures implemented?			
3	If working outdoors, weather conditions have been assessed?			
4	Operatives trained and competent for the task?			
5	All fragile/loose equipment/surfaces/areas identified, and area below work isolated?			
6	Suitable fall prevention measures have been provided and applied (if appropriate)?			
7	Fall restraint measures have been prioritised over fall arrest features?			
8	If a fall arrest/fall restraint harness is to be used the certification is available and in date?			
9	Fixed or permanent access platforms been considered over ladder usage?			
10	Scaffold/mobile platform erected by competent operative (PASMA trained) to NASC SG4 standard?			
11	If a MEWP is being used it is operated by a competent person (IPAF trained)?			
12	A rescue plan is place and communicated to Permit Users prior to work commencing?			

**NOTE: If scaffold or mobile towers are to be used, they must be erected and struck by a competent person
This permit must be available for inspection, in the work area, on request.**

Description of works:

Section 1: Acceptance (to be completed by UHL authorised person)

I am aware of the activity to be conducted and verify that a suitable and sufficient risk assessment and method statement has been implemented that addresses the associated hazards and applicable control measures

Name (print)	Signature	Date:	Time
Contact Number:	Designation:		

Section 2: Acceptance (to be completed by the PIC or CP for the intended works)

I am competent to supervise/perform the works described and accept responsibility for conducting the work detailed in this permit and associated risk assessment. No attempt will be made by me or others to deviate from the agreed work method and controls

Contact Number:	Company:	Date:	Time
Name (print)	Signature:		

Section 3: Completion (to be completed by the PIC or CP for the intended works)

<i>I declare that the work has been completed and all equipment and people under my supervision have been withdrawn and the area left in a safe condition.</i>			
Name (print)	Signature	Date:	Time
Section 4 Cancellation (to be completed by UHL authorised person) <i>The described works have been completed satisfactorily and the area left in a safe condition. The permit is now cancelled.</i>			
Name (print)	Signature	Date:	Time