



Work at Height Policy and Procedures

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POLICY

1. Introduction

The University of Wolverhampton has duties under the Health and Safety at Work etc. Act 1974 to ensure the health, safety and welfare of its employees and make similar provision for non-employees including students and visitors who may be affected by the University's activities.

2. Purpose

This Policy is intended to provide clarification on the following:

- The current position;
- What constitutes work at height;
- Who is responsible for implementing the Regulations;
- The requirements to work at height;
- Work at height risk assessments; and
- The 'hierarchy of control' when work at height is undertaken.

3. Scope

The policy applies to all staff, either directly or indirectly employed by the University, all students, visitors, consultants, contractors, and sub-contractors whilst on university owned and controlled (rented or leased) property.

4. The current position

The Work at Height Regulations 2005, as amended by the Work at Height (Amendment) Regulations 2007, have been made to prevent the deaths and injuries caused each year by falls at work. The Regulations also replace all earlier regulations about work at height. Work at height is the single biggest cause of workplace deaths and one of the main causes of major injuries.

5. Definition - What is work at height?

Work at height is work in any place, including a place at, above or below ground level, where if precautions were not taken, a person could fall a distance liable to cause personal injury. You are working at height if you work above ground/floor level, could fall from an edge, through an opening or fragile surface or 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 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.

Work at height is no longer classed simply as any work above 2 meters off the ground, however parts of the original '2 metre rule' still apply in the construction industry.

A working platform can now be virtually any surface from which work can be carried out, such as:

- Work on a roof.
- Erecting false work and formwork;
- Work from a ladder or step ladder;
- Work from a scaffold (fixed or mobile);
- Mobile elevating work platforms (MEWPs);
- Work at ground level adjacent to an open excavation; and
- Work near or adjacent to fragile materials.

Note the above list is not exhaustive and work at height may include other activities not listed.

Some examples of where the Regulations will not apply:

- Walking up and down a staircase in an office;
- Work on the upper floors of an office block or Portacabin;
- Slipping or tripping on level ground; and
- Sitting in a chair.

6. Roles and responsibilities

Responsibility for implementing the Regulations:

The purpose of The Work at Height Regulations is to prevent death and injury caused by a fall from height. If you are an employer or you control work at height (for example facilities managers or building owners who may contract others to work at height) the Regulations apply to you.

Employers and those in control of any work at height activity must make sure work is properly planned, supervised and carried out by competent people. This includes using the right type of equipment for working at height. Low-risk, relatively straightforward tasks will require less effort when it comes to planning.

Within the University, all employees, all contractors working on behalf of the University and all employees who control work at height are required to follow the Regulations.

Employers and those in control must first assess the risks, it is the responsibility of the duty holder (the person responsible for organising or planning the work) to carry out an assessment of the risks to those who work at height and identify, where practicable, alternative methods of controlling the actual need to work at height.

The Regulations require the duty holder to ensure:

- all work at height is properly planned and organised;
- all risks from work at height are assessed;
- all work at height takes account of weather conditions that could endanger health and safety;

- those involved in work at height are trained and competent;
- the place where work at height is carried out is safe;
- appropriate work equipment is selected and used;
- the risks from fragile surfaces are properly managed;
- the risks from falling objects are properly controlled; and
- all equipment used for work at height is properly inspected and maintained.

It is ultimately the responsibility of the Dean of Faculty/Service Director to ensure that duty holders are not only carrying out their responsibilities but are also competent to do this.

Employees have general legal duties to take reasonable care of themselves and others who may be affected by their actions, and to co-operate with their employer to enable their health and safety duties and requirements to be complied with. For an employee, or those working under someone else's control, the law says they must:

- Report any safety hazard they identify to their employer.
- Use the equipment and safety devices supplied or given to them properly, in accordance with any training and instructions (unless they think that would be unsafe, in which case they should seek further instructions before continuing).

Further information on employers and employee's responsibilities can be found in the Health and Safety Executive Guidance (INDG401): <http://www.hse.gov.uk/pubns/indg401.pdf>

7. Policy

The requirements for work at height.

When considering work at height the following steps should be undertaken:

- conduct a risk assessment;
- avoid, prevent, or minimise the need to work at height (hierarchy of control); and
- where work at height remains a requirement, ensure that staff are competent to do the work and are properly supervised.

Work at height – Risk Assessment

Duty holders must, where possible, ensure that work at height is avoided by carrying out the work in another way. Where work at height cannot be avoided, the risk of falling must be prevented and the consequences of a fall minimised by carrying out a risk assessment. Risk assessment is an integral part of planning for any work at height task; by following a process of risk assessment, work at height hazards will be identified which will inform the control measures to be considered as part of the work at height safe working methods. Duty holders must ensure a risk assessment is in place and take account of the risk assessment when applying the requirements of the Regulations. For details on how to carry out a risk assessment see the Health and Safety Department's "Risk Assessment Policy" and associated materials (e.g. "How to..." Guidance and separate Risk Assessment Form).

<https://www.wlv.ac.uk/staff/services/hsd/policies-procedures--forms/>

A risk assessment is a requirement of health and safety legislation. It is also a careful examination of what could cause harm to people as a result of work activity and will also 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.
- Evaluate the risks and decide whether the existing precautions are adequate or more should be

done.

- Record your findings; and
- Undertake appropriate reviews of your assessments.

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

- Working conditions.
- Adverse weather conditions likely to give rise to any unnecessary or additional risk.
- Access and egress.
- Distance and consequences of a fall.
- Duration and frequency of use/task.
- Ease of rescue and evacuation.
- Risk of use, installation, and removal of equipment.
- A plan for emergencies and rescue.
- The potential to outsource, should the risk level be higher than acceptable.

Consideration should specifically be given to the most common causes of accidents due to fragility

- Roof lights.
- Liner panels on built-up sheeted roofs.
- Non-reinforced fibre cement sheets.
- Corroded metal sheets.
- Glass (including wired glass).
- Rotted chipboard.
- Slates and tiles.

When selecting equipment for working at height, you must:

- Use the most suitable equipment.
- Give collective protection measures (e.g., guard rails etc., as detailed in the regulations) priority over personal protection measures (e.g., safety harnesses).
- Take account of the working conditions and risks to the safety of all those at the place where the work equipment is to be used.

Through the risk assessment process, the work at height 'hierarchy of control' should always be implemented (see below).

Work at height – Hierarchy of control

As required by the Work at Height Regulations, there is a 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 an option from lower down in 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 chronological order these are AVOID, PREVENT, MINIMISE.

It is the responsibility of the duty holder to:

- avoid work at height where they can;
- use work equipment or other measures to prevent falls where they cannot avoid work at height; and
- where they cannot eliminate the risk of a fall, use work equipment or other measures to minimise the distance and consequences should one occur.

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.

Competency & training

All those who undertake work at height must have sufficient skills, knowledge, and experience to perform the task, or, if they are being trained, that they work under the supervision of somebody competent to do it.

In the case of low-risk, short duration tasks involving ladders, 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) and appropriate training. Training often takes place on the job; it does not always take place in a classroom.

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.

All staff employed to undertake work at height must be.

- Competent to work at height (or, if under training, be appropriately supervised by a competent person).
- Where circumstances require, trained in how to avoid falling and how to minimise injury should they fall (where control measures do not eliminate the risk of falling); and
- Managers must ensure that this training takes place and is refreshed as necessary.

Duty holders must have arrangements in place to ensure that:

- All employees concerned are adequately trained, informed and instructed as to the system, equipment and area that are affected by particular aspects of work and which legal requirements, safety procedures and related documents still apply.
- Other persons that are not employees but who may be affected by the operations or work also receive adequate information, instruction and training where appropriate.

Work at Height training is available through the Organisational Development Programme (course dates advertised and bookable via Agresso Self Help).

Use of ladders/step ladders.

The use of ladders and portable steps are permitted where the risk assessment relating to the activity to be carried out defines these are the most appropriate method of work at height. You should only use ladders in situations where they can be used safely, e.g., where the ladder will be level and stable, and where its reasonably practicable to do so, the ladder can be secured.

Like any other work at height task a risk assessment must consider any reasonably practicable alternatives to the use of ladders. As a guide, if your task would require staying up a leaning ladder or stepladder for more than 30 minutes at a time, it is recommended that you consider alternative equipment.

The requirements of the Work at Height Regulations (such as inspections of equipment) equally apply to ladder, stepladder, and mobile platform work, in that, they should:

- Have an up-to-date record of the detailed visual inspections carried out regularly by a competent

- person. These should be done in accordance with the manufacturer's instructions.
- Have no visible defects. They should have a pre-use check each working day.
- Be suitable for the intended use, i.e., are strong and robust enough for the job.
- Have been maintained and stored in accordance with the manufacturer's instructions

Summary

All activities at the University which involve work at height must:

- be properly planned;
- be appropriately supervised;
- be carried out by competent individuals or if being trained be supervised by a competent person;
- be risk assessed; and
- follow the 'hierarchy of control'.

Ladders and portable steps are permitted provided that a risk assessment has been carried out and that assessment has identified ladders as the most appropriate method of work at height.

It is only when this process has been followed that work at height will be appropriately managed and the University of Wolverhampton assured of its compliance with the Work at Height Regulations 2005.

8. Incident reporting

All incidents, accidents and near misses should be reported to the Duty holder (Manager) and logged on the University on-line incident report system. <https://secure60.prositehosting.co.uk/sssl/WLVAC/>.

Accidents affecting contractors should also be reported to their employer as soon as possible in line with their company's equivalent procedures.

9. Exceptions

There are no exceptions to this policy.

10. Amendments

The University may change this Policy at any time, and where appropriate. Where a policy is not due for review, but is found to require updating, it will remain published, unless the reasons for review render it obsolete.

11 Information and Resources

For further advice on work at height see the associated Health and Safety Executive Guidance (INDG401): <http://www.hse.gov.uk/pubns/indg401.pdf>

12. Contact

For general queries, please contact the University Health and Safety team.

Email: HSDEmails@wlv.ac.uk

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