

Work at Height Policy

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1.0 Introduction

The objectives of this policy are:

- To ensure that staff, students, contractors on School Partnership Trust Academies (SPTA) premises are safeguarded from injury or death when working at height.
- To have arrangements in place for systems and procedures to minimise the risk of falls from height
- To ensure the SPTA complies with relevant legislation and standards, including:
 - The Health & Safety at Work etc. Act 1974 and associated legislation
 - The Management of Health and Safety at Work Regulations 1999
 - The Work at Height Regulations 2005
 - The Work at Height (Amendment) Regulations 2007

The Work at Height Regulations 2005 came into force on 6 April 2005.

They replace all earlier regulations about working at height and consolidate previous legislation on working at height and implement European Council Directive 2001/45/EC concerning minimum safety and health requirements for the use of equipment for work at height (the Temporary Work at Height Directive).

In 2005/06 falls from height accounted for 46 fatal accidents at work and nearly 3500 major injuries, of these 66% were as a result of falling from a height of less than 2 meters. They remain the single biggest cause of workplace deaths and one of the main causes of major injury.

Definition

What is 'Work at Height'?

Height - A place is 'at height' if a person could be injured falling from it, even if it is at or below ground level (all heights).

Work – Includes moving around a place (except by a staircase in a permanent workplace) but not travel to or from a place of work.

2.0 Policy Statement

- SPTA recognises it has an obligation under the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999, and the Work at Height Regulations 2005 for the health, safety and welfare at work of its staff and students, as well as people not in its employment.
- All reasonable steps shall be taken by the SPTA to provide a safe working environment for employees, students or contractors, etc. who are required to carry out their trade or professional skills at height.
- SPTA and each academy will provide the necessary preventive and protective measures to prevent falls of persons or materials in the workplace and will liaise with any other persons involved in the work activity. Employees and any other person involved in the work activity shall co-operate in the implementation of this policy.
- The responsibility for the implementation of this policy on behalf of the SPTA lies with the Academy Principals who are responsible for staff, students or contractors who may be working at height.
- The SPTA will ensure that:
 - all work at height is properly planned and organised;

- those involved in work at height are competent;
- the risks from work at height are assessed and appropriate work equipment is selected and used;
- the risks from fragile surfaces are properly controlled;
- equipment for work at height is properly inspected and maintained.
- The SPTA and its Academies will operate the following hierarchy for managing and selecting equipment for work at height:
 - avoid work at height wherever possible;
 - use work equipment or other measures to prevent falls where working at height cannot be avoided;
 - 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.

3.0 Legislation

The Health & Safety at Work etc Act 1974 and associated legislation

The Management of Health and Safety at Work Regulations 1999

The Work at Height Regulations 2005

The Work at Height (Amendment) Regulations 2007

4.0 Procedures

- Work at height must be avoided wherever possible.
- Work at height must not take place unless a risk assessment has been carried out for that activity.
- All persons working at height must be competent to do so
- The person planning work at height must ensure that the work is postponed while weather conditions endanger health or safety
- Existing places of work and means of access for work at height: Every existing place of work or means of access or egress at height within the SPTA and Academy premises will:
 - be stable and of sufficient strength and rigidity for the purpose for which it is intended to be or is being used;
 - where applicable, rest on a stable, sufficiently strong surface;
 - be of sufficient dimensions to permit the safe passage of persons and the safe use of any plant or materials required to be used and to provide a safe working area having regard to the work to be carried out there;
 - possess suitable and sufficient means for preventing a fall;
 - possess a surface which has no gap –
 - through which a person could fall;
 - through which any material or object could fall and injure a person; or
 - giving rise to other risk of injury to any person, unless measures have been taken to protect persons against such risk;
 - be so constructed and used, and maintained in such condition, as to prevent, so far as is reasonably practicable -
 - the risk of slipping or tripping; or
 - any person being caught between it and any adjacent structure;
 - where it has moving parts, be prevented by appropriate devices from moving inadvertently during work at height;

- where access is required to these places the appropriate roof permit or permit to work will be issued.

4.1 Collective fall protection measures

SPTA will ensure that the place where work is done at height (including the means of access) is safe and has features to prevent a fall (as described in Section 4), unless this would mean that it is not reasonably practicable for the worker to carry out the work safely (taking into account the demands of the task, equipment and working environment). Where the standards in Section 4 cannot be met, each academy will provide equipment for preventing (as far as is reasonably practicable) a fall occurring by means of guard rails, toe boards, barriers and similar collective means of protection.

This means of protection shall –

- be of sufficient dimensions, of sufficient strength and rigidity for the purposes for which they are being used, and otherwise suitable;
- be so placed, secured and used as to ensure, so far as is reasonably practicable, that they do not become accidentally displaced; and
- be so placed as to prevent, so far as is practicable, the fall of any person, or of any material or object, from any place of work.

4.2 Fall arrest systems

If the precautions in Section 4 and Section 4.1 do not entirely eliminate the risk of a fall occurring, the person planning work at height must do all that is reasonably practicable to minimise the distance and effect of a fall i.e. use a fall arrest system.

4.3 Equipment for work at height

When selecting equipment for work at height the persons planning the work must:

- use the most suitable equipment;
- give collective protection measures (e.g. guard rails) 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.

4.4 Inspections

- SPTA and each academy must ensure (as far as it is reasonably practicable to do so) that each individual place at which work is to be done at height is checked on every occasion before that place is used. This involves checking the surface and every parapet, permanent rail etc.
- Each Academy must also ensure that any item of a type mentioned in Schedules 2 to 6 of the Work at Height Regulations (i.e. collective fall prevention (e.g. guard rails and toe boards), working platforms, collective fall arrest (e.g. nets, airbags etc.), personal fall protection (e.g. work restraints, work positioning, fall arrest and rope access) and ladders and stepladders are inspected:
 - after it is assembled or installed (or after it has been assembled and installed if both are required), if its safety depends on how it is assembled or installed;

- as often as is necessary to ensure safety, and in particular to make sure that any deterioration can be detected and remedied in good time.

4.5 Working platforms

- Condition of surfaces:
 - Any surface upon which supporting structures rest must be stable, and of sufficient strength to support the supporting structure, the working platform and any loading intended to be placed on the working platform.
- Stability of supporting structure:
 - Only supporting structures, (i.e. tower scaffold) approved by the Academy will be used on Academy premises, or by SPTA employees.
- Any supporting structure will be suitable and of sufficient strength and rigidity.
- In the case of a wheeled structure, will have brakes to prevent movement during work at height.
- Be prevented from slipping by secure attachment to the bearing surface or to another structure, provision of an effective anti-slip device or by other means of equivalent effectiveness.
- Be stable while being erected, used and dismantled.
- When altered or modified that it remains stable.

NB: Stability of working platforms

- A working platform will:
 - Be stable and of sufficient strength and rigidity;
 - Be correctly erected;
 - When altered or modified, ensure that it remains stable;
 - Be dismantled in such a way as to prevent accidental displacement.

NB: Safety on working platforms

- A working platform must:
 - be of sufficient dimensions to permit the safe passage of persons and the safe use of any plant or materials required to be used and to provide a safe working area;
 - possess a suitable surface and have no gap in the working platform through which a person or object that could hurt someone could fall;
 - not create a tripping or slipping hazard;
 - not create a risk of any person being caught between the working platform and any adjacent structure.

NB: Loading

- A working platform and any supporting structure shall not be loaded so as to give rise to a risk of collapse or to any deformation which could affect its safe use.

NB: Tools and equipment

- Tools and equipment should not be left on working platforms when the platform is being moved.

4.6 Fragile surfaces

The Academy will ensure that no one working under their control goes onto or near a fragile surface unless that is the only reasonably practicable way for the worker to carry out the work safely.

- If anyone does work on or near a fragile surface the Academy will:
 - ensure (as far as it is reasonably practicable to do so) that suitable platforms, coverings, guard rails, and the like are provided (and used) to minimise the risk;
 - Do all that is reasonably practicable, if any risk of a fall remains, to minimise the distance and effect of a fall.
- Prominent warning notices will be fixed at the approaches to the danger zone of any fragile surfaces.

4.7 Falling Objects

The Academy, and those working at height will do all that is reasonably practicable to prevent anything falling. If it not reasonably practicable, those working at height must ensure that no one is injured by anything falling.

- Those working at height must ensure nothing is:
 - thrown or tipped from height if it is likely to injure anyone;
 - stored in such a way that its movement is likely to injure anyone.
- Where the Academy has an area in which there is a risk of someone being struck by a falling object or person, the Academy will ensure that the area is clearly indicated and that (as far as reasonably practicable) unauthorised people are unable to reach it.

4.8 Steps and ladders

Ladders are acceptable for short term light duty work. Any ladders used must be in good condition and inspected prior to use. The following basic principles will be adhered to:

- Access ladders, steps, trestles and lightweight staging should meet BS 2037:1994 or BS 1129:1990.
- Each Academy will not buy or use equipment that does not meet these standards.
- Access to the decks of rack storage is permitted only where handrails and toe-boards have been fitted, and where suitable load bearing flooring is fitted. This also applies to the use of roofs of internal offices, staff rooms, toilets, etc. Safe means of access must be provided.
- Suitable access equipment (dependent on circumstances) is supplied by the Academy for access to high levels.
- It is imperative that employees understand that using the access equipment provided is mandatory. Improvised access equipment is not acceptable for accessing heights.

The basic rules for steps and ladders maintenance and use are:

- Ladders are not to be painted; varnish or wood preservative should be used.
- All steps and ladders should be frequently inspected for defects by the Superintendent and taken out of service if dangerous.
- All ladders should be recorded on the ladder register.
- Three points of contact should be maintained on a ladder at all times.
- Checks to make are splits, cracks, splintering, warping or bruising, undue wear (especially on rungs), missing rungs, wedges and tie rods for tightness, feet should be sound and not split or frayed, ropes and other fittings should be of sound condition.

- Ladders should be positioned at an angle of 1:4 so that the foot of the ladder is one unit out for every four units high. Use them on secure, level bases, lash or clamp at the top or support at the base by the second person.
- All step-ladders must be opened to the full extent allowed for by tie-ropes/bars and **MUST NOT BE USED AS AN ORDINARY LADDER.**
- Only staff trained to use ladders are permitted to use them.

4.9 Flat roofs

All roof work must be carried out in line with the HSE guidance INDG284 Working on Roofs. Wherever anyone could fall, the first line of defence is to provide adequate edge protection to prevent a fall occurring. This should include or be equivalent to:

- a main guard rail at least 950 mm above the edge;
- a toe board and brick guard where there is risk of objects being kicked off the edge of the platform; and
- a suitable number of intermediate guard rails or suitable alternatives positioned so that there is no gap more than 470 mm.
- Sometimes a roof parapet may provide equivalent protection but if it does not, extra protection will be required.

4.10 Sloping roofs

Full edge protection at eaves level will normally be required for work on sloping roofs. The edge protection needs to be strong enough to withstand a person falling against it. The longer the slope and the steeper the pitch, the stronger the edge protection needs to be. A properly designed and installed independent scaffold platform at eaves level will usually be enough. Less substantial scaffolding barriers (rather than platforms) may not be strong enough for work on larger or steeper roofs, especially slopes in excess of 30°.

On some larger roofs, the consequences of sliding down the whole roof and hitting edge protection at the eaves may be such that intermediate platforms are needed at the work site to prevent this happening.

If the work requires access within 2 m of gable ends, edge protection will be needed there as well as at the eaves. Alternatively, consider using MEWPs or proprietary access systems as an alternative to fixed edge protection where appropriate for the work you are planning.

5.0 Responsibilities

5.1 Principal

- Shall have overall responsibility for ensuring compliance with Health and safety legislation.
- Shall ensure that adequate resources are made available to implement the policy.

5.2 Academy Leadership Team

- Shall ensure the effective implementation of the Work at Height policy in their area of responsibility.

- Shall ensure that all activities and sites within their responsibility are assessed for work at height risks on a regular basis.
- Shall ensure that all employees receive appropriate work at height training both at induction and through regular update sessions.

5.3 Health and Safety Coordinator/ Facilities Managers/Site Superintendent

- Shall liaise as necessary with contractors to provide and obtain Work at Height information.
- Shall ensure that Work at Height risk assessments are carried out for all relevant activities within their area.
- Shall supervise contractors in relation to their work at height and enforce safe working practices.
- Shall liaise as necessary on work at height implications for construction and refurbishment projects with architects, building control and contractors.
- Shall arrange for the maintenance of any work at height equipment including ladders, scaffolds and working platforms.
- Shall arrange for work at height training where necessary.
- Will be suitably trained in Work at Height.
- Should ensure that staff working at height are physically fit to do so.
- Will assist with work at height risk assessments.

5.4 Employees

- All employees shall be responsible for becoming familiar with the relevant contents of this Work at Height Policy and the day to day observation of work at height safety
- All employees who have to work at height shall be responsible for becoming familiar with the contents of any work at height risk assessment that concerns them.
- All employees shall be responsible for ensuring that they attend work at height training.
- All employees should be responsible for reporting unsafe work at height procedures if observed.
- Employees must report any damage or defects they observe to work at height equipment.
- Staff working at height should make themselves aware of the first aiders on site and their location.

5.5 Students

- All students that have to work at height as part of their training must comply with the instructions of their instructors when working at height.
- Students must not interfere with any work at height equipment.
- Students must report any damage or defects they observe to work at height equipment.

6.0 Training

SPTA recognises that training is required for staff to acquire competence in working at height. SPTA will ensure that all staff as part of CPD have access to adequate training.

6.1 Work at Height training

- All SPTA staff who work at height will attend Work at Height Training.

- Records will be kept of attendance.

6.2 Step ladder and ladder training

- All persons working with steps and ladders will be provided with training on the use and maintenance of steps and ladders.
- All users of steps and ladders will be provided with the HSE publication INDG405

6.3 Mobile Elevated Work Equipment Training

Any staff that are required to use Mobile Elevated Work Platforms (MEWPS) will be required to attend IPAF accredited training to operate this equipment

6.4 Mobile Tower Scaffold Training

Any staff that are required to use mobile tower scaffold will be required to attend PASMA accredited training to use this equipment.

7.0 Reference / Guidance

- *www.hse.gov.uk.*
- *The Working at Heights Regulations 2005. INDG 401*
- *Safe use of ladders and stepladders. INDG 455*
- *Falls from heights webpages: www.hse.gov.uk/falls/index.htm*
- *The International Powered Access Federation www.ipaf.co.uk*
- *The Prefabricated Access Manufacturers and Suppliers Association www.pasma.co.uk*
- *The Work at Height Safety Association www.wahsa.org.uk*