

Working at Heights Policy	Type: Policy Register No: 09085 Status: Public
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Consulted With	Post/Committee/Group	Date
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1. Purpose

- 1.1 The purpose of this policy is to outline the steps to be taken by the Trust to ensure that staff, contractors or others do not work at height where it can be avoided. Where this is not possible a written suitable and sufficient risk assessment must be undertaken and a safe system of work developed.
- 1.2 Any work at height needs to be properly planned in advance of the work activity, appropriately supervised and carried out in a safe manner. Careful consideration should be given to the selection and use of work equipment.

2. Introduction

- 2.1 The Work at Height Regulations 2005 is in place to protect staff and others against risks to their health while working at height.
- 2.2 Work 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.

3. Scope

- 3.1 This policy is applicable to all staff and independent contractors working within the Trust.
- 3.2 Persons responsible for developing Work at Height related guidance or procedures, such as the Estates Department, IT Department, Broomfield PFI Estates Department and Braintree Community Hospital PFI Estates Department must ensure that it complies with this policy.

4. Responsibilities

4.1 Senior and line managers are responsible for:

- Ensuring that every effort is made to avoid working at height
- Ensuring that, where working at height cannot be avoided, a suitable and sufficient assessment of the risks to health has been carried out
- Ensuring employees and their representatives are consulted when assessing the risks connected with working at heights
- Providing suitable work equipment or other measures to prevent falls where work at height cannot be avoided
- Ensuring all equipment used while work at height is being carried out is properly inspected and maintained
- Ensuring 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
- Ensuring that all staff involved in working at heights are aware of this policy, understand its content and comply with local procedures and safe systems of work

- Ensuring all staff that work at height are fit to do so
- Ensuring that all staff who work at height and those who issue permits to work have appropriate information, instruction, training and supervision
- Ensuring all contractors employed are competent to work at height and are appropriately managed when on site.

4.2 **Line Managers and Supervisors who issue permits to work, are responsible for:**

- Assessing all associated risks involved in working at height, using the Trust's Risk Assessment form in accordance with the Trust Risk Management Strategy & Policy
- Developing a safe system of work
- Ensuring all necessary precautions, including emergency procedures, are taken
- Checking safety at each stage of the work
- Acting upon any report of an activity or defect likely to endanger safety
- Checking the workplace before it is used
- Checking work equipment installed or assembled prior to use
- The issue of the permit to work and its cancellation
- Managing contractors while they are on site.

4.3 **Staff working at heights are responsible for:**

- Assisting with the assessment of risks
- Complying with any safe system of work developed through risk assessment and any requirements of a permit to work
- Using any safety equipment supplied
- Following training and instruction
- Informing their managers if they suspect that the system of work in place is ineffective or inadequate
- Reporting any activity or defect likely to endanger safety
- Reporting all incidents (including near misses) and any defects in equipment using a Trust incident reporting form.
- Report to management if they suspect they may not be fit enough to work at height

5. **Operational Systems**

5.1 In the event that working at heights cannot be avoided, a suitable and sufficient risk assessment must be carried out and a written safe system of work developed including the provision of emergency procedures. See Appendix 2 for the Safe Working Procedures document and Appendix 3 for the Working at Height Risk Assessment form.

5.2 A permit to work at height will be required (in accordance with Permit to Work Policy) where access is to be gained to any 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(Appendix 1).

5.3 Assessing the risks

5.3.1 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.

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

- Working at ground level adjacent to an excavation
- Working on roofs
- Working from a ladder

5.3.3 Specific guidance on ladders and stepladders can be found in the Health and Safety Executive document "Safe use of ladders and stepladders".INDG 455

5.3.4 **Associated areas for consideration may include:**

- The work activity being carried out
- Frequency of access
- The duration of the work
- The location in relation to the presence of hazards such as open excavations, overhead services etc
- The working environment with regard to weather or lighting
- Safe means of access and egress
- Lone working
- Condition and stability of work surfaces such as fragile materials, slippery surfaces etc
- Physical capabilities of the workers such as pregnancy or vertigo sufferers
- The equipment to be used and its inspection
- Falling objects
- Prevention of access by unauthorised persons

5.3.5 The risk assessment must be recorded on a Trust risk assessment form (as seen in Appendix 3) 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.

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

5.3.7 Information on work at heights is available from the HSE website at <http://www.hse.gov> or from the Trust's Health and Safety Manager.

5.4 Developing a Safe System of Work

5.4.1 The information gathered during the risk assessment will be used to develop a written safe system of work document which will give information and instruction to the employees who are to carry out the work.

5.4.2 This will include all of the risk control measures and the reasons for their application, e.g. the need to use ladder fixing points.

5.4.3 It will also detail, where necessary:

- The means for preventing unauthorised access to the area underneath the work being carried out
- Any supervision that may be necessary
- Any weather conditions that workers may be exposed to e.g. icy roofs, slippery surfaces in the rain, wind
- Any emergency or rescue conditions e.g. it is not acceptable just to rely 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. Monitoring

- 6.1 The monitoring of this policy will be through monitoring of proactive risk assessment as part of an annual policy audit. The annual policy audit results of the annual policy audit will be presented at the H&S Group for scrutiny.
- 6.2 Incidents reported via the Trust Risk Event reporting procedure will also be reviewed by the H & S Group as part of the H&S Report.

7. Training

- 7.1 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. Training may include the use of ladders, erection and use of scaffold or use of a Mobile Elevated Work Platform (MEWP), the use of harnesses and lanyards and escape plans.
- 7.2 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.

8. Communication & Implementation

- 8.1 The policy will be made available on the Trust's intranet & website by the Estates Department. The Principal Engineer will be responsible for issuing copies to senior operational managers for them to disseminate within their wards and departments.
- 8.2 The Head of Maintenance will be responsible for ensuring all Estates staff read and fully understand the policy and is read in conjunction with the Control of Contractors Policy.
- 8.3 The Broomfield PFI Estate Manager will be responsible for ensuring all PFI Estate staff read and fully understand the policy and is read in conjunction with the Control of Contractors Policy.
- 8.4 The Braintree Community Hospital (BCH) PFI Estate Manager will be responsible for ensuring all PFI Estate staff read and fully understand the policy and is read in conjunction with the Control of Contractors Policy.

- 8.5 The approved policy will be notified in the Trust's Staff Focus that is sent via e-mail to all staff.
- 8.6 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.

9. Equality & Diversity

- 9.1 The Trust is committed to the provision of a service that is fair, accessible and meets the needs of all individuals.

10. References

Health and Safety Executive: The Management of Health and Safety at Work Regulations 1999;

Health and Safety Executive: Working at Heights a Brief Guide INDG 401

Health and Safety Executive: Health and Safety in Roof work HSG 33

Health and Safety Executive: Working on roofs INDG 284

Health and Safety Executive: Personal protective equipment (PPE) at work (INDG174)

Health and Safety Executive: Safe use of ladders and stepladders (INDG 455)

Further information on working at height can be found at the Health and Safety Executives website at <http://www.hse.gov.uk>

Working at Heights Permit

Permit No:

Building / Area:..... **Exact location:**

Job Details:.....

Tools/Special Equipment to be used:.....

This permit is only valid when all sections are complete. If you are in doubt or don't understand, then please ask.
Please ensure that you sign this permit to work. On receipt of this permit the responsible person will be issued with a key for access to the identified roof area. Return key and permit form to Estates Department for filing.

I have read, and understand the Policy for roof level working. I will not access any other Roof Area.

Hazards to be aware of and precautions to be taken	✓ Please Tick	Yes	No	N/A
Are you qualified / trained to undertake this work?				
Appropriate permits posted?				
Is there a safe means of access and egress?				
Area to be barricaded?				
Is there a means of contact in emergency? Method				
Crawl boards with handrails and roofing ladder to be used?				
Scaffolding and/or harness required?				
If yes? Is scaffolding in place and inspected?				
Weather conditions acceptable?				
Ducts or outlets on roof?				
If yes? Any hazard from fumes, steam etc.?				
Existing overhead services crossing and/or adjacent to proposed height working?				
Edge protection, guard rails, toe boards required? (roof or scaffold)				
Are there fragile surfaces?				
Is personal protective equipment required?				
2 nd Man if required? NAME				

Other precautions required:

Other safety equipment required:

Preparation Complete. Acceptance and Authorisation

I verify the above location has been examined, the precautions on the checklist have been taken, and that permission is authorised for this work. I also accept responsibility for the work to be carried out.

Name of person and company accepting the work:.....**Signed**.....

Authorised By:.....**Title**.....

Date and Time:..... **Time of Expiry:**.....

Hand Back and Cancellation Procedures

I confirm that the work has been completed/partially completed, checked by myself and the area left in a safe and tidy condition. (please delete accordingly)

Name of person: **Date and Time:**.....

I have inspected the finished work and hereby cancel this permit.

Name of person: **Date and Time:**.....

Safe Working Procedures: Working at Heights

1. Safe working procedures for the use of Steps
2. Safe working procedures for the use of Ladders for all tasks
3. Safe working procedures for the use of Tower Scaffolds for all tasks
4. Safe working procedure for the use of Mobile Elevating Work Platforms (MEWP)
5. Safe working procedures for tasks on Flat Roofs
6. Safe working on Fixed Vertical Ladders for Access

1. Safe working procedures for the use of Steps

Procedures to be followed when carrying out standard tasks such as:

Cleaning high level surfaces above arms length
 Changing cubicle curtains
 Changing lamps
 Cleaning vent grilles
 Removing/fixing vent grilles
 Repairing luminaires
 Removing/fitting ceiling tiles
 Cleaning A/C Unit filters and louvers
 Removing/fitting Fire Alarm detectors
 Max Height for a Standard task is 2.7mtrs from floor level.
 Max duration of standard task is 30mins (for continuous work on the steps)

Procedures to be followed:

- Assess the task, is it suitable to be carried out on a pair of steps and is of low risk and short duration.
- All staff using steps must have received formal 'Working at Height' training within the last 3 years
- Inspect the steps; make sure they have an in-date inspection label
- Ensure the steps in good condition? Undertake a pre use check as per your training.
- Place steps on level ground, open to maximum span.
- Check all four stepladder feet are in contact with the ground and the steps are level.
- Only carry light materials and tools
- Don't overreach
- Ensure any locking devices are engaged
- Position the stepladder to face the work activity and not side on.
- 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;
- Place warning signs around you, or have safety men assisting you.
- Do not place the steps where you have to lean over to work,
- Always keep 3 points of contact with the steps.
- Do not go above 3 rungs from the top.
- Do not leave tools on the platform part.
- Carry out the task in a safe manner
- Tidy up after completion
- Check the steps are suitable to be used again.
- Replace steps in the correct and secure place never leave them where public can access them.
- Avoid damaging the steps when storing.

Procedures to be followed for Non Standard tasks:

- Non standard tasks are over 2.7mtrs from the floor level
- Non standard tasks have a duration of longer than 30mins
- Non standard tasks are not restricted to the above.
- ALL Non standard tasks are to be individually Risk Assessed.
- Alternative methods should be given every consideration.
- All Non Standard tasks need the permission of the Maintenance supervisor before commencement.

2. Safe working procedures for the use of Ladders for all tasks

Procedures to be followed in the safe use of Ladders

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

Guidance:

- Assess the task, Ensure it is within the HSE INDG455 publication guidelines for working from a ladder
- Confirm with the Maintenance Supervisor that the task can be carried out safely.
- All staff using Ladders must have received formal 'Working at Height' training, within the last 3 years.
- A written, individual task, risk assessment MUST be carried out before any use of a ladder.
- Inspect the Ladder, check for an in-date inspection id. tag.
- Ensure that the ladder is suitable for the task, make sure it is long enough and fit for purpose.
- 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.
- At least 2 operatives are required to erect the ladder.
- 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.
- Display warning signs around the position.
- Make sure the ground is level and firm.
- The ladder must have a 4:1 ratio, up 4 and out 1.
- Avoid holding items while climbing or descending, use a tool belt or similar
- Make sure the ladder extends a minimum of 3 rungs (1mtr) above where you are working.
- DO NOT work within 6trs 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 and have an alternative means of fall prevention if doing so.
- Don't try to move or extend ladders while standing on the rungs;
- A leaning ladder must be secured to prevent slipping. Footing the ladder is only for short duration tasks.
- When the ladder is for access it should extend past the landing point at least 3 rungs (1mtr) and be tied off.
- 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.

3. Safe working procedures for the use of Tower Scaffolds for all tasks

Procedures to be followed in the safe use of Tower Scaffolds

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

- Tower scaffolds can only be erected by officially trained and competent persons. A list of staff trained for this is available in the Maintenance office.
- All staff using tower scaffolds must have received formal working at height training within the last 3 years.
- 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.
- Only use a safe access to the tower, this must be on the inside of the tower by an appropriately designed built-in ladder.
- A task specific Risk Assessment needs to be undertaken for every task requiring the use of a tower scaffold.
- All tasks require warning signs positioned to alert persons of the potential of any falling items causing harm to people.
- Where possible and practicable erect barriers at ground level to prevent people from walking into the tower or work area;
- Remove or board over access ladders to prevent unauthorised access if it is to remain in position unattended.

Never use a tower –

- as a support for ladders, trestles or other access equipment;
- in weather conditions which are likely to make it unstable;
- with broken or missing parts;
- with incompatible components.

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

For all tasks

Procedures to be followed; in the safe use of “Cherry Picker” and all 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 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 Maintenance offices.
- At all times follow your training
- All staff using a MEWP must have received formal working at height training, and specific instruction for hydraulic platform working.
- A task specific Risk Assessment needs to be undertaken for every task requiring the use of a MEWP
- All tasks require warning signs positioned to alert persons of the potential of any falling items causing harm to people.
- Where possible and practicable erect barriers at ground level to prevent people from walking into the or work area.
- 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.
- An emergency rescue plan must be part of the Working at Height Risk Assessment.

5. Safe working procedures for tasks on Flat Roofs

Procedures to be followed in the safe working on flat roofs;

Note: All 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 hand rails fitted;

- Flat roofs can only be accessed by staff who have received official Working at Height Training within the last 3 years.
- The hand rails are designed to prevent falls, under no circumstances' should they be used for standing on.
- No person should cross the hand rail barrier and work from the 'other side'
- No ropes or lifting equipment should be attached to the barriers.
- Any alterations to the hand rails is to be by specialist contractors only and subject to a specific Risk Assessment.
- 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.
- For tasks within 2mtrs of skylights or a similar 'Fragile roof structure' a specific Risk Assessment must be undertaken.
- 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.

6. Safe working on Fixed Vertical Ladders for Access

Procedures in the safe use of Fixed Vertical ladders (FVL) for access;

Note; All FVL's should be restricted access, estates staff only.

Guidance for FVL usage;

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

WORKING AT HEIGHT RISK ASSESSMENT

TASK:

RISKS:

Level of Risk					
	Most likely consequence (if in doubt grade up, not down)				
Likelihood of occurrence	None (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
Almost certain (5)	5	10	15	20	25
Likely (4)	4	8	12	16	20
Possible (3)	3	6	9	12	15
Unlikely (2)	2	4	6	8	10
Rare (1)	1	2	3	4	5

Initial Risk Rating: (Likelihood) (Severity) (Risk)

Safety measures to be Taken:

Authorised by : NAME

Supervisor Signed

Date

Authorised by : NAME

Manager Signed

Date

Residual Risk Rating: (Likelihood) (Severity) (Risk)

Operative : NAME

Signed

Date