

# HEALTH AND SAFETY

## SAFETY POLICY & ARRANGEMENTS



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**Subject:** Work At Height

### Introduction

**This document forms part of the National Ice Centre's organisational written safety policy arrangements.**

Departments, services or teams may consider it appropriate to develop additional guidance and systems of work on specific work related activities.

Where proposals, additional guidance or changes to systems of work will have an impact on health, safety and welfare, this will be discussed and agreed at the Health & Safety Committee.

If you have any questions or require further information or support on the contents of this document, please contact the NIC Health & Safety Advisor or Corporate Safety Advice.

### Overview Of Management & Colleague Responsibilities

#### Manager Responsibilities

Below is an overview of the responsibilities which is intended to support managers in identifying their key duties that need to be taken to comply with the requirements of this document and the safety management systems of the National Ice Centre.

- Managers must ensure all work at height activities and operations been identified.
- Managers must ensure that adequate consideration been given to avoiding work at height.
- Managers are required to ensure risk assessments of work at height activities/operations been undertaken.
- Managers need to ensure where possible avoid a work at height activity/operation.
- Managers must ensure any appropriate work equipment been selected and provided, and other control measures put in place to prevent falls from height.
- Managers need to consider if the risk of a fall cannot be eliminated, has appropriate work equipment been selected and provided, and other controls put in place to minimise the distance and consequences of a fall, should one occur.
- Managers must ensure the use of ladders and stepladders has been minimised.
- Managers need to demonstrate that all work at height activities properly planned and organised.
- Managers need to ensure that the risks from fragile surfaces properly controlled.
- Managers must ensure equipment used for work at height properly inspected and maintained.
- Managers need to ensure that all affected colleagues have received suitable and sufficient training in working at heights and the use of associated equipment.

#### Employee Responsibilities

The Health & Safety at Work Act 1974 section 7 requires all employees to consider their own health & safety and the safety of others.

As an employee of the National Ice Centre, if you have concerns in relation to health & safety that is likely to cause you or someone else, injury or ill health then you must ensure that the concern is communicated to your manager immediately.

You are also required to co-operate with the management of the National Ice Centre to ensure compliance with the health & safety arrangements, policies and procedures and work to the requirements identified within this document.

## Defining Work At Height

Managers are legally required to manage work at height within their workplace.

The first step in this process is to identify what work at height activities and operations are carried out.

Work at height is considered as work in any place (including a place at or above ground level) where a person could be injured if they fell from that place.

Access and egress to a place of work (e.g. climbing a ladder to get to a higher point) is also identified as work at height.

### Examples of work that is classified as work at height:

- Working on a flat or pitched roof.
- Working from a ladder.
- Working at ground level adjacent to an open excavation.
- Work near or adjacent to fragile materials (e.g. roof materials).

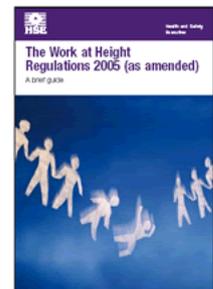
### Examples of where the regulations don't apply:

- Walking up and down stairs in a building. However, work on stairs (e.g. maintenance or decorating activities) would be classified as work at height.
- Working in the upper floors of a building.
- An operator sitting in the seat of a vehicle.
- Sitting in a chair.
- Slips and trips on the level.
- Caving or climbing involved in sport and recreation activities

The Work at Height Regulations 2005 provides a 'hierarchy of control' for determining how to manage the risks arising from work at height:

Avoid work at height.

- (a) Where work at height cannot be avoided, use work equipment or other measures to prevent falls.
- (b) 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. It is not necessary to implement all parts of the hierarchy if the risks are adequately controlled by one part e.g. in the case of a fully boarded and guarded scaffold platform, colleagues would not be expected to also wear personal fall-arrest equipment.



The information contained within this document not only covers work that is being directly undertaken by The National Ice Centre but also where colleagues go onto sites that are under the control of another organisation.

For example, if a colleague is required to go onto a building site and are then required to work at height, both the site manager and the colleague's own line manager have duties under this legislation to ensure the safety of that worker.

Colleagues also have a duty to bring to the attention of their own manager or site manager any concerns that they may have in relation to working at height.

## Work At Height Risk Assessments

After identifying work at height activities and operations the next stage is to carry out a work at height risk assessment.

Managers need to complete work at height risk assessments for all work at height activities except where the activity poses a low or trivial risks e.g. using a kick-step to access shelves in an office.

However, work at height activities that involve only low or trivial risk should be included in a teams own general risk assessments.

It is the responsibility of managers to ensure that work at height risk assessments are undertaken within their area of control.

Managers can either complete risk assessments themselves, or delegate this task to colleagues within their area of responsibility.

Where the manager delegates the task of completing out a risk assessment, they must ensure that the colleague is competent to carry out the assessment.

To assist in this process, a 'Work at Height' risk assessment template has been developed and is available from the safety manual.

## Work At Height - Permits To Work

Managers must ensure that the permit to work has been completed for any work at height that meets the following criteria:

- Any work which is considered as being of high risk to the person undertaking the work at height activity
- Any work which because of its location is liable to cause injury to any other person in the vicinity of the work at height activity

A permit to work is required to be completed prior to the commencement of the work at height.

The permit to work is the responsibility of the manager, however, it will require completion by the persons undertaking the work at height activity and must be retained by the premises to which the work is associated to.

A copy of the permit to work must be made available to the workers completing the work when requested

## Avoiding Work At Height

It may not be possible to avoid work at height, but consideration should always be given to the question of whether avoidance is possible.

For example, some window-cleaning firms now use extendable cleaning poles to avoid the use of ladders.

## Preventing Falls From Height

Where managers identify that it is not reasonably practicable to avoid work at height, the next consideration is whether equipment or other measures can be taken to prevent falls e.g. by using working platforms with guardrails, or access equipment such as Mobile Elevating Work Platforms (MEWPS) such as cherry pickers, scissor lifts, etc.

This legislation identifies that the fall distance should be considered as any height where the fall distance is likely to cause injury.



Injuries can be taken to include, impact injuries caused by the height itself or other injuries that may occur due to the environment such as the surfaces or objects that may cause injury due to their proximity to the person falling.

If the risks are trivial, it is not reasonably practicable to take extensive precautions; therefore the only action for managers may need to take is to provide relevant information, instruction or training.

## Minimising Falls From Height

Where it isn't possible to avoid working at height, or it is feasible to implement controls to prevent falls from occurring, then further steps must be taken to minimise the distance and consequences of a fall.

This may be achieved though the adoption of systems such as; safety nets, air bags, fall arrest, work-restraint, work positioning, rope access and positioning techniques, etc.

The NIC Health & Safety Advisor / Corporate Safety Advice will be able to provide advice on the suitability of control measures.

## Selecting The Right Equipment

One of the intended outcomes of carrying out a work at height risk assessment is that the right equipment will be selected for that particular activity / operation.

When selecting work equipment for use at height, the following factors need to be taken into account:

- The working environment:
  - What are the ground conditions,
  - are there likely to be space constraints,
  - are other people working in the same area,
  - is it in a public area.
- The duration and frequency of use:
  - Is the work activity of short duration,
  - is it repetitive.
- Emergency and rescue procedures: Can a timely evacuation and/or rescue be instigated?
- The distance and consequences of a potential fall: Can a fall occur? If so, does it have the potential to cause injury?
- In the case of access and egress, what is the distance to be travelled?
- Are there any additional risks posed by the installation, use, dismantling or removal of the work equipment?
- The dimensions of the work equipment, to ensure a safe working area and safe passage.
- The potential loadings of people, equipment and materials.
- Is it appropriate for the nature of the work to be undertaken?

Not all of these factors will be relevant to all work at height activities but further advice on these issues is given in relevant sections of this document.

## Collective & Personal Protective Equipment

When deciding on appropriate control measures, it must be remembered that collective control measures always take priority over personal control measures.

Collective measures (such as scaffolding, airbags and safety nets) protect more than one person at any one time and are usually passive (i.e. they require no action by the user to work properly).

Personal control measures (e.g. fall-arrest harnesses) rely upon only protecting the user.



They are also usually active (i.e. the user has to do something for the equipment to work, e.g. clipping on an anchorage point).

## Planning & Supervision

Managers need to ensure that any work at height needs to be planned and organised in advance of the activity.

Where the activity or operation is not high risk and occurs regularly, it may be possible to identify a 'standard' safe system of work or procedure rather than create a formal plan each time the task is carried out.

The safe system of work for work at height needs to take account of:

- Any supervision that may be necessary. e.g. the use of fall arrest equipment will require a higher level of supervision.
- The weather conditions. e.g. carrying out maintenance on an icy roof, or working in rainy or windy conditions on a slippery surface.
- Any surrounding or adjacent areas and activities that may be affected by the work at height.
- Any emergency or rescue procedures that may be required. e.g. if a person falls while using a fall-arrest system how will they be rescued?

The environment in which working at height is to take place must be assessed to ensure that it is suitable for the work at height equipment that is to be utilised.

Any colleague who is expected to undertake work at height must have suitable training on the use of the equipment. If you require advice on training, contact Corporate Safety Advice directly.

## Ladders & Stepladders

The Work at Height Regulations does **not** preclude the use of ladders and stepladders, but they do require that careful consideration is given to their use.

Ladders should only be used where the use of other equipment (such as tower scaffolds, podium steps or temporary stairs) is not possible or appropriate.

Where ladders and stepladders are utilised, it should only be used for undertaking light work of short duration.

Work activities involving the carrying of heavy loads should never be carried out from a ladder.

When using a ladder, it is always recommended that three points of contact is maintained (i.e. two legs and a hand).

Where a task requires both hands to be used to complete the required task, both ladders or step ladders without a specifically designed standing platform must not be considered as the correct equipment for that job.



## Fragile Surfaces

Managers must ensure that controls are in place to ensure that colleagues do not go onto or near a fragile surface through which they could fall.

The only exception to this rule is where it is the only reasonably practicable way for the work to be carried out safely, having fully considered the demands of the task, equipment and working environment.

In the first instance, fragile surfaces should be identified and clearly indicated with prominent warning notices fixed at approaches to the danger zone (see example safety sign opposite). Roof spaces, roof coverings and skylights are often fragile surfaces.



Please contact the NIC Health & Safety Advisor Corporate Safety Advice for further advice on identifying fragile surfaces.

If work on or near a fragile surface is unavoidable:

- It must be ensured that suitable platforms, covering, guardrails, etc, are provided and used.
- If the risk of a fall still remains, the distance and effect of a fall must be minimised

## Falling Objects

Managers need to consider that the risk of falling materials be minimised by keeping working platforms clear of loose materials. In addition, toe boards, solid barriers and/or brick guards should be provided at open edges.

If scaffolding is erected in a public place, debris nets, fans or covered walkways (as appropriate) should also be provided.

Where material needs to be dropped or removed from a platform the method should be decided during planning so that it can be done in a controlled manner (e.g. using a chute) into a receiving area that is clearly marked (e.g. with clear warning signs) and secured to keep people out.

## Checks & Inspections

### Checks

The Work at Height Regulations places a duty where working at height will be undertaken for it to be checked by the user or operator, on every occasion before the activity begins.

This is taken to include a visual inspection of the surface on which the equipment will be placed and the integrity of any existing edge or fall protection, the actual access equipment, etc.

### Inspections

The Work at Height Regulations identifies inspections as being a more formal process.

An inspections must be carried out for the following types of equipment:

- Scaffolding and other working platforms fitted with handrails, toe-boards, barriers, etc.
- All types of personal fall protection and fall arrest systems.
- Ladders and stepladders.

Managers need to ensure that any inspections are carried out by a competent and trained person:

- Each time it is assembled or installed.
- At intervals so that any deterioration can be detected and remedied in good time.

Where inspections are necessary, Managers need to implement a system to formally record that they have been undertaken.

Certain scaffolding must be erected by an approved contractor.

If there are any concerns about the erection of scaffolding, managers need contact to the NIC Health & Safety Advisor.

If managers utilise any of the types of equipment that require formal inspections, the NIC Health & Safety Advisor & Corporate Safety Advice can provide advice on competency issues, inspection frequencies and record keeping.

## References & Further Information

The following information and reference material is in place to assist managers to understand their responsibilities and duties.

### **NCC Documentation and Links**

- Leaning Ladder Templates
- Step Ladder Templates

### **External References**

- INDG 401 – ‘The Work at Height Regulations 2005 - A Brief Guide’ (HSE)
- INDG 455 – ‘Safe use of ladders and stepladders. An employer’s guide’ (HSE)