



Working at height policy

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Review Annually

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1.0 Introduction

Falls from height are the biggest cause of workplace deaths in the UK and one of the main causes of major injuries. The Work at Height Regulations 2005 was enacted to protect staff and others against risks to their health and safety while working at height. The amended 2005 regulations removed the definition of 'Work at Height' being at least two metres, and placed no minimum height at which Work at Height considerations apply.

Work at Height should be avoided where possible. However, there will be times when this is not possible and a suitable and sufficient risk assessment must be undertaken and a safe system of work implemented.

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 taken in the selection and use of work equipment, including ladders. This policy and procedure are applicable to all West Norfolk Academies Trust staff irrespective of their role. However, contractors employed to carry out works on behalf of WANT or the associated schools must prove that working at height has been considered prior to starting any task.

2.0 Definitions

Work at Height - This is work in any 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/or egress to a place of work. Work at Height does not include slip, trip or fall on the same level, nor does it include walking up or down a permanent staircase in a building

Work Equipment - This is any machinery, appliance, apparatus, tool or installation for use at work (Provision and Use of Work Equipment Regulations 1998). There may be mandatory inspections required on this equipment and this is the remit of the Premise/ Site Manager.

3.0 Responsibilities

3.1. Headteachers

Headteachers hold the ultimate responsibility for their respective site, however, some responsibilities can be delegated accordingly

- Ensure that every effort is made to avoid working at height and that where this cannot be avoided a suitable and sufficient risk assessment is undertaken before the work is carried out.
- Ensure that a method statement, which includes emergency procedures such as guard rails, has been developed prior to working, except for the simplest activities where precautions are straight forward and easily repeated.
- Provide suitable work equipment or other measures such as guard rails, to prevent falls where work at height cannot be avoided and ensure that all work at height is being properly maintained and inspected
- Ensure that all staff working at height have appropriate information, instruction, training and supervision to ensure their competence.
- Ensure that contractors do not start any work at height without having provided a suitable risk assessment and method statement

- Ensure that all contractors employed are competent to work at height and are appropriately supervised when on site.

3.2 Premises / Site Managers

- Ensure that a thorough roof survey is conducted every 5 years.
- Ensure that a record of all fragile roofs is maintained for their respective site and that suitable signage is in place.
- Ensure unauthorised access to roofs and places of height are controlled
- Ensure that any equipment is purchased, maintained and inspected as required
- At as a point of contact, to assist the headteacher, for all contractor requirements and ensure all documentation is in place prior to starting a task.
- Ensure all site staff, and those identified by departments, complete working at height and ladder safety training every 2 years.
- Ensure nominated staff remain current regarding authorisations to use specific equipment such as scaffolding or mechanical lifts where utilised.
- Monitor all staff for correct working at height procedures and address any potential H&S issue in the first instances. If a requirement for working at height is identified follow the requirements of this policy.
- Complete any requirement delegated by the head in order to meet the requirements of this policy

3.3 Estates Manager

- Assist in arranging roof surveys and carrying out follow up action to ensure remedial work is scheduled according to priority
- Conduct an audit to ensure control measures are in place to prevent unauthorised access and to confirm servicing or inspections of equipment.
- Ensure risk assessments and method statements are fit for purpose as part of an audit process.
- Be responsible for the review of this policy.
- Assist the Premises / Site manages in the procurement of suitable training.

3.4 Employees

- Assist line management with the assessment of risks with regard to working at height and informing them if the system of work is inadequate, and do not work in the area until informed it is safe to do so
- Comply with all mitigating measures as identified in the risk assessment and any requirement
- Complete any training allocated to them as applicable to their role
- Inform the Premises / Site manager should a working at height requirement be identified
- Utilise the correct equipment to ensure safe working at height procedures.
- Report all accidents and incidents (including near misses), or any defects in equipment to the Premises / Site Manager or Estates Manager

4.0 Procedures

Note: Where possible working at height should be avoided and alternate provision should be considered. For example,

1. Can gutters be suitably cleared using a designated vacuum cleaner? Figure 1 shows.
2. Can a drone be used to obtain images of roof surfaces for survey purposes?

Both options are available with equipment held at Springwood High School



Fig 1 – gutter clearance using a vacuum

4.1 Working with ladders, Step-ladders or Step-stools

Taken from INDG455 Safe Use of Ladders and Step-ladders

Ladders can be used for low-risk, short duration activities that do not require higher level fall protection. As a guide ladders and step ladders should be used for no more than 30 minutes.

4.1.1. Using ladders

Training is required in the safe use of ladders and users must be deemed competent to be able to use the equipment safely.

4.1.2. Pre-Use Checks

A pre-use check of ladders should be carried out:

- By the user
- At the start of the task
- After something has changed e.g. if the ladder has been dropped or damaged, moved from a dirty to a clean area etc.

Items to check

- The Stiles – ensure they are not bent or damaged, as the ladder could buckle or collapse
- The Feet – if they are missing, worn or damaged the ladder could slip. Also check the ladder feet if moving from soft/dirty ground to smooth, solid surfaces to make sure that there is nothing embedded to prevent the feet from contacting the ground
- The Rungs – if they are bent, worn, missing or loose the ladder could fall
- Any Locking Mechanisms – if they are bent, worn or damaged the ladder could collapse. Ensure that any locking bars are engaged.
- Stepladder platform – if it is split or buckled the ladder could become unstable or collapse
- Steps or treads on stepladders – if they are contaminated they could be slippery, if the fixings are loose on steps, they could collapse Record the outcomes of any pre-use checks in the ladder booking out ledger.

4.1.3. Precautions

Simple precautions to minimise the risk of a fall:

Leaning Ladders

- Only carry light materials
- Don't overreach
- Make sure the ladder is long enough or high enough for the task (*See note 1*)
- Don't overload the ladder, check the pictogram or information on the ladder
- Make sure the ladder is at 75°
- Always grip ladders and face the ladder rungs while climbing or descending
- Don't move or extend ladders while standing on the rungs
- Don't work off the top three rungs and make sure the ladder extends at least 1m above where you are working
- Avoid holding items when climbing
- Maintain three points of contact when climbing (one hand and two feet)

NOTE 1: When using a ladder to enable the clearance of gutters it will be necessary to use a suitable stand off frame to ensure the ladder does not rest against the gutter and to provide sufficient height to allow the task to be completed. Figure 2 shows



Fig 2 - Stand-off frame in use

Stepladders

- 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
- Don't stand or work on the top three steps
- Ensure any locking devices are engaged
- Try and position the stepladder to face the work activity and not side on
- Try to avoid work that imposes a side loading
- Maintain three points of contact at the working position (two feet and one hand)

4.2. Working with Mobile Scaffolds

Taken from HSE (<http://www.hse.gov.uk/construction/safetytopics/scaffold.htm>)

Towers should be erected by trained and competent people. There are a number of organisations that provide training for the safe erection and use of tower scaffolds

The incidents that occur are mainly caused by:

- **Dangerous methods of erection or dismantling** – where a safe system is not being followed
- **Defects in the erected scaffold** – where the tower structure is incorrectly assembled or where a platform guardrail is missing
- **Misuse of the scaffold** – where a ladder is used on a tower causing it to overturn or when a person falls while the tower is being moved.

4.2.1. Erection and dismantling

The manufacturer, supplier or hirer has a duty to provide an instruction manual explaining the erection sequence, including any bracing requirements.

Towers should be erected following a safe method of work, either using:

- **Advance guard rail system** – where temporary guard rail units are locked in place from the level below and moved up to the platform level. They are in place before the operator accesses the platform to fit the permanent guard rails.
- **'Through-the-trap' (3T)** – involves the operator taking up a working position in the trap door of the platform, from where they can add or remove the components which act as the guard rails on the level above the platform. It is designed to ensure that the operator does not stand on an unguarded platform.

4.2.2. Stability

To maintain tower stability, you must make sure:

- The tower is resting on firm, level ground with the locked castors or base plates properly supported. Never use bricks or building blocks to take the weight of any part of the tower; stabilisers or outriggers are installed when required by the instruction manual; and
- That a tower is never erected to a height above that recommended by the manufacturer.

4.2.3. Precautions and inspection

Tower scaffolds must comply with the standard required for all types of scaffolds, e.g. double guardrails, toe boards, bracing and access ladder. When the tower is purchased or hired it should arrive with all the necessary components to prevent falls and ensure stability.

Towers rely on all parts being in place to ensure adequate strength. They can collapse if sections are left out. All towers must be inspected following assembly and then at suitable regular intervals by a competent person. In addition, if the tower is used for construction work and a person could fall 2 metres or more from the working platform, then it must be inspected following assembly and then every 7 days. Stop work if the inspection shows it is not safe to continue, and put right any faults. The result of an inspection should be recorded and kept until the next inspection is recorded.

4.2.4. Using and moving

Make sure everyone involved is aware of, and follows, these simple rules:

Using

Never use a tower:

- In strong winds;
- As a support for ladders, trestles or other access equipment;
- With broken or missing parts; or
- With incompatible components.

Moving

When moving a tower, you should always:

- Reduce the height to a maximum of 4m;
- Check that there are no power lines or other obstructions overhead;
- Check that the ground is firm, level and free from potholes; and
- Push or pull using manual effort from the base only.

Never move a tower while people or materials are on the tower, or in windy conditions.

4.3 Working with mobile mechanical lifts

Mobile mechanical lifts such as scissor lifts or cherry pickers can offer a safe method of reaching areas where a ladder or scaffolding would not be a suitable option. However, the following should be considered when using mobile mechanical lifts

- Is the user qualified and suitably experienced to operate the machine? Some rental company's offer the additional provision of an operator as part of the rental agreement
- Is the equipment suitable for the task at hand? Is the ground sufficiently firm enough to support the unit? Are there height restrictions such as over head cables?
- What additional control measures are required to allow the safe operation of the equipment within a school setting? This should be captured by conducting a risk assessment.

Note: Mechanical lifting equipment is subject to service and inspection requirements as per the Lifting Operations and Lifting Equipment Regulations (LOLER) 1998

5. Risk Assessment Guidance

Training in how to complete a risk assessment is available upon request from the Trust Estates Manager in addition to the following guidance. A generic risk assessment for working at height is provided in Annex A to this policy.

In the event that work at height cannot be avoided, a suitable and sufficient risk assessment **MUST** be undertaken. The outcomes of this risk assessment must provide the evidence for the development of a method statement, which includes the provision of emergency procedures. If the risks are significant, the assessment and the method statement must be recorded.

5.1. Assessing the Risks

When assessing risk, all available information about the work to be undertaken needs to be available and consulted. All foreseeable risks must be considered in advance and the following may need to be considered.

- Working on roofs without adequate fixed protection
- Working on roofs without unprotected roof lights
- Working from a ladder
- Working from a scaffold or scaffold tower

5.2. Areas for consideration:

- The work being undertaken
- Frequency of access
- Duration of the task
- Location in relation to the presence of hazards e.g. overhead services etc.
- The working environment with regard to weather and 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
- Falling objects
- Impact on adjacent work activities, or passage of staff adjacent to work at height
- Prevention of access by unauthorised persons

5.3. Developing a Method Statement

Note: A task where precautions are identified as straight forward and easily repeated would not necessarily require a method statement. For example, gutter clearance or rigging of performance lighting. A task requiring access to the roof surface of a building would include higher risk and would therefore justify the need for a method statement.

In the development of a written method statement, the information gathered during the risk assessment will be used to develop a document that will give information and instruction to the employee/s who are carrying out the work. It will also detail, where necessary:

- Collective fall protection
- Personal fall arrest
- Requirements for inspection
- The means of 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. ice roofs, slippery surfaces in the rain, wind etc.
- 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

Collective measures such as guard rails etc. should be deployed in the first instance rather than personal protection. Fall arrest/restraint equipment should be the last in the hierarchy of control as Personal Protective Equipment (PPE).

5.4. Rescue Plan

Any method statement must include a rescue that considers how an injured worker could be removed safely. The speed of response is an essential consideration, especially when a safety harness is being used as a control measure. Persons suspended in a harness can become unresponsive in as little as five minutes and may be fatally injured in 15 minutes if help is not immediately available.

6. Training Requirements

All site team members and any identified faculty staff who are required or permitted to use ladders, mobile scaffolding or mobile mechanical lift equipment will be required to undertake the following training that must complete refresher every 2 years or sooner following an incident.

- Step-ladder, ladder safety awareness
- Working at height awareness

Risk assessment

School Site: As required Section/Team: As required Location: As required Activity/Area: As required Assessor Name: S Bowdery Manager Name: S Bowdery	Assessment name: General working at height tasks Assessment Date: Review Date:
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What are the hazards?	Who might be harmed and how	Existing Risk controls	Assessment of Risk			Further Risk Controls required	Residual Risk		
			L	C	RR		L	C	New RR
Fall from height	Site teams, Staff, Students, visitors Serious injury or death from fall from a ladders or step-ladder	<i>Note: A ladder is only used where there is no other practical method of allowing safe work at height. Chairs, tables etc are not classed as suitable alternate methods</i> A ladder should only be used for a short duration. If the work required is likely to take more than 30 minutes to complete an alternate form of access equipment such as scaffold tower or platform should be considered Ladders should be stored securely when not in use to prevent unauthorised use. Ladders should be set at the correct angle of 75 Deg (1:4) and should be positioned on a firm, level base. Ladders should be secured to the structure to prevent slipping. If this is not possible the ladder should be footed at the bottom by a suitably experienced person Ladders will not be placed on top of other objects at any time when in use Suitable hold off frames should be used when access is required above the level of a gutter to prevent the ladder from resting on the gutter itself Ladders are not to be used to gain access to roofs – Where the need is identified a specific Risk	3	5	15	A ladder should only be used where there is no other practical method available. Scaffold towers and mechanical lifts provide a much more stable working platform and offer additional fall protection in the form of barriers. Note- - Scaffolding should only be erected by suitably trained and authorised personnel and is subject to inspection requirements - Mechanical lifts should only be operated by suitably experienced personnel For gutter clearance consider the use of a gutter vacuum machine as this will negate the need for ladder use. West Norfolk Academies Trust current have access to a machine located at SHS Mechanical means such as extendable poles etc should be considered to aid in the retrieval of sport equipment or high level cleaning as opposed to using a ladder	1	5	5

		Assessment should be carried out a a method statement created Footwear should be none slip and suitable to the task at hand and all rungs and steps should be clear of mud or debris 3 points of contact should be maintained throughout when using a ladder When in use the top 3 rungs of a ladder or the top 2 steps of a step ladder should not be used. Staff included in the task should have completed both ladder safety and working at height training Ladders should be positioned to ensure overreaching is not required as this can cause toppling of the ladder Ladders should not be used during periods of inclement weather such as rain or strong wind							
Objects falling from height	Site teams, Staff, Students, Visitors Serious injury or death sustained from objects falling from height	Where tools are required they should be secured at all times The surrounding area should be cordoned or monitored to restrict access when working at height is taking place If using a ladder, the person footing the ladder should consider suitable head protection Items such a waste or debris should be refrained from dropping from height and a collection method should be considered	2	5	10	A ladder should only be used where there is no other practical method available. Scaffold towers and mechanical lifts provide a much more stable working platform and offer additional fall protection in the form of barriers and larger platform areas. Note- - Scaffolding should only be erected by suitably trained and authorised personnel and is subject to inspection requirements - Mechanical lifts should only be operated by suitably experienced personnel	1	5	5
Defective equipment	Site teams, Staff, Students, Visitors Serious injury or death from use of defective equipment	Working at height equipment should be inspected before every use with defective equipment removed from use and labelled as defective. Mechanical lift equipment should be serviced in accordance with the Lifting Operations and Lifting Equipment Regulations (LOLER) Check ladders for - Splits in wooden ladders - Missing feet - Warped rungs or sides - Bent ladders - Broken locking devices etc. If in use check the stand-off frame to ensure security to the ladder	1	5	5	Existing control measures adequate			

Annex A to WNAT Working at height policy

Restricted walkways	Site teams, Staff, Students, Visitors	Work at height tasks should be carried out at quiet times. Alternate routes should be provided to avoid areas where working at height is taking place Warnings should be in place to inform pedestrians if working at height is taking place directly around blind corners	1	5	5	Existing control measures adequate			
Overhead objects	Site teams, Staff, Students, Visitors	Ensure the area above the equipment in use is clear to ensure the user does not climb into an obstruction Consider - Cables - Overhanging trees - Overhangs of buildings	1	5	5	Existing control measures adequate			

(L - Likelihood C – Consequence RR – Risk Rating NRR – New Risk Rating)

The tables below identify if further action is required depending on the risk rating allocated for each hazard:

Consequence						
Likelihood		Extreme (5)	Major (4)	Moderate (3)	Minor (2)	Insignificant (1)
	Almost Certain (5)	25	20	15	10	5
	Likely (4)	20	16	12	8	4
	Possible (3)	15	12	9	6	3
	Unlikely (2)	10	8	6	4	2
	Rare (1)	5	4	3	2	1

Action levels		How the risk should be managed
16-25	Unacceptable	Stop activity and make immediate improvements.
10-15	Significant	Identify controls needed and set timescale for improvement.
05-09	Adequate	Review current controls according to school policies and procedures.
01-04	Acceptable	No further action, but ensure controls are maintained and reviewed at next review date.