West Norfolk Academies Trust

Working at Height

Compliance Code

Reviewed: January 2026

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1. 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 stated there is no minimum height at which Work at Height considerations apply.

Work at Height should always be avoided where possible through the use of mechanical means such as lifts, hoists or gutter clearance vacuums etc. However, there will be times when this it 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 Compliance code is applicable to all West Norfolk Academies Trust staff irrespective of their role. Contractors employed to carry out works on behalf of WNAT must prove that working at height has been considered prior to starting any task and copies of Risk Assessment Method Statements (RAMS) should be requested.

2. 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. Responsibilities

3.1. Headteachers

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

- 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.
- Provide suitable work equipment or other measures such as guard rails, to prevent falls where work at height cannot be avoided
- Ensure that all control measures identified in the risk assessment are being implemented
- Ensure that all staff working at height have appropriate information, instruction and training 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

Where the responsibility is delegated the requirements below are to be carried out

- 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. In some cases, signage is not a suitable deterrent and physical restriction may be required such as fencing etc.
- Ensure that any equipment purchased is suitable for the task identified
- Ensure all equipment is maintained and inspected as required. For mechanical lifting equipment LOLER will need to be considered.
- Act as a point of contact for all contractor requirements and ensure all documentation is in place prior to starting a task.
- Conduct regular checks of contractors to confirm adherence to agreed control measures
- Ensure all site staff, and those identified by departments, complete working at height training.
- 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. Where staff continually fail to meet the requirements of this Compliance Code this should be address following a disciplinary route. See WNAT Discipline Policy.
- Complete any requirement delegated by the head in order to meet the requirements of this policy

3.3 Deputy Chief Operations Officer (DCOO)

The DCOO must ensure compliance with this code through the completion of site visits and inspections.

Where the risk assessment additional control measures identify an improvement to the fabric of the building this should be factored into the 5-year infrastructure plan for the site.

3.4 Employees

Section 7 of the H&S at Work Act 1974 places a responsibility on all employees to ensure they do not expose themselves or others to undue risk by not adhering to the control measures implemented by the employer.

Staff found not to be complying may be exposing themselves to disciplinary measures through none compliance.

Therefore, all staff are required to

- Assist line management with the assessment of risks with regard to working at height and informing them if the system of work is inadequate.
- Comply with all contorl measures as identified in the risk assessment
- 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

3.5 Contractors

All contractors commissioned to conduct work at height are to provide a copy of their Risk Assessment Method Statement (RAMS) prior to commencing any works.

Works can include

- Contracted window cleaning
- Contracted gutter clearance/ Maintenance
- Roof surveying / repairs
- Etc.

In some cases, contractors may place the emphasis for providing safe access on the site prior to conducting works. Where this is the case any provision must be agreed with the contractor and all requirements of this compliance code are to be met prior to work commencing.

When commissioned by WNAT the Trust/ School hold the responsibility for ensuring that all contractors follow the approved control measures and regular checks should therefore be carried out. Where failure to comply is identified the contractor must cease work until the issues are sufficiently addressed.

4. Potential working at height tasks within schools

The following list details tasks that are common within schools where working at height should be included in a risk assessment with suitable control measures identified. This list is not exhaustive and as such other tasks will need assessment as and when identified.

- Accessing roof spaces for maintenance or equipment retrieval
- Access to gutters for maintenance and cleaning
- Accessing of water towers for maintenance or inspection
- Changing light tubes
- Reaching high level storage such as shelving
- Hanging of displays
- Performances utilizing stages or platforms
- Rigging of performance lighting

5. Procedures

NOTE: Furniture such as desks, Tables and Chairs are not suitable for working at height requirements. Irrespective of the duration of a task the correct equipment is to be used.

Where possible working at height should be avoided and alternate provision should be considered.

For example,

Can gutters be suitably cleared using a designated vacuum cleaner?

Can a drone be used to obtain images of roof surfaces for survey purposes?
Can sport equipment be retrieved from ground level?

WNAT has access to a gutter vacuum and drone and can be requested via the DCOO

5.1 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.

5.1.1. Using ladders

Ladders should only be used by competent staff who have suitable experience to consider the following

- Is the Ladder suitable for the task at hand? Does the ladder reach the required height without being fully extended?
- Is the ladder in good condition? Has the monthly inspection been carried out? Has a pre-use check been carried out?
- Is the weather suitable to allow safe use? Ladders should never be used during strong wind conditions
- Is there a more suitable option available such as mobile scaffolding?

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 of 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.

Precautions

Simple precautions to minimise the risk of a fall:

Leaning Ladders

- Ensure the ladder is sufficiently long enough for the task at hand. There should be sufficient length to extend at least 1 meter above the point of work
- Never over reach. Relocate the ladder should the point of work be more than an arm's length away
- Don't overload the ladder, check the pictogram or information on the ladder for max weight limits
- Make sure the ladder is at 75°
- Always grip ladders and face the ladder rungs while climbing or descending. Maintain three points of contact
- Don't move or extend ladders while standing on the rungs
- Avoid holding items when climbing

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

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. Relocate the ladder as required
- 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 introduces a side loading

- Maintain three points of contact at the working position

5.2. 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.

Note – Contractors commissioned to conduct work as part of a project will often utilise scaffolding. It is the contractor's responsibility to ensure that the scaffolding is correctly assembled, secured and inspected. This requirement should be stated within the Risk Assessment Method Statement (RAMS) provided as part of the project documentation. Site staff are NOT permitted to utilise this scaffolding without the express permission of the principal contractor.

5.2.1. 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.

5.2.2. 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.

5.2.3. 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. 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.

5.2.4. Using and moving

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

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.

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.

5.3 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?
- there height restrictions such as overhead cables?
- What additional control measures are required to allow the safe operation of the equipment within a school setting? Consider student interaction.

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

6. Risk Assessments

For information on how to conduct a risk assessment see the WNAT Risk Assessing guidance

However, foreseeable hazards such as those listed in paragraph 4 are likely to have been assessed as part of the Site General Risk Assessment or Relevant department Risk Assessment as required in the respective department Compliance Code.

For example, operating on the stage should be considered as part of the Drama performance Risk assessment.

Therefore, a separate Risk Assessment may only be required in exceptional circumstances

6.1 Roof work control measures

The WNAT estate consist of numerous buildings all of differing design. Therefore, they are numerous types of roof structure.

Pitched roof –

Pitched roofs should not be accessed due to the increased risk of fall from the slopped surface. As such access should be restricted to gutter maintenance only using the methods described in this compliance code.

Where repairs have been identified a suitable contractor should be employed to address the issues.

Flat roofs –

Where a building has a flat roof, it may be determined that it is safe to access. However, this is not the case. The roof may be fragile and as such not suitable for access or there may be no safe access or fall protection in place.

WNAT is working towards providing safe access and fall protection on all flat roofs. Therefore, where this provision is in place then access is permitted to conduct maintenance and inspections to ensure roof warranties remain valid.

Where there is no safe access or fall protection, or there is lack od suitable PPE such as harnesses, then access is strictly not permitted. As per pitched roofs any repair or maintenance requirement should be outsourced.

Note: safe access and fall barriers are to be inspected annually IAW BS 13700:2021. This is included as a compliance requirement.