Working at Height Procedure

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Contents

Summary

Purpose of this Procedure
This procedure is intended to ensure a safer working environment for anyone who works at height as part of work activities. Working at height means work in any place where, if there were no controls in place, a person could fall a distance liable to cause personal injury. Working at height includes:

Use of ladders and stepladders to carry out routine maintenance tasks (e.g. changing projector lamps and filters)
Carrying out tasks using kick stools
Where a fall into an opening in a floor could occur

This procedure is intended to ensure that the University of Portsmouth is compliant with current legal requirements and best practice with regards to employees carrying out or organising work at height activities.

Who is this Procedure for?
This procedure is intended for all University staff and students who work at height or are exposed to hazards associated with working at height whilst on University owned and controlled property or off-campus whilst conducting work activities.

Estates and Campus Services
Work at height carried out by contractors is managed by Estates and Campus Services; people wishing to access rooftops must follow the Estates and Campus Services policy and procedure Arrangements for Working at Height Code of Practice.

How does the University ensure the Procedure is implemented?
The Health & Safety Office monitors the implementation of control measures and procedures identified in risk assessments for all activities. Results from audits of procedures, risk assessments, accident and incident data, as well as feedback from staff and students are utilised to ensure continual improvement.

This procedure and associated procedures and documentation are subject to internal audit.

Who to contact for enquiries about this Procedure?
Any questions about this procedure should be directed to the Health & Safety Office.

Introduction

Falls from height are one of the biggest causes of workplace fatalities and major injuries, with common accidents being low falls such as falls from ladders.

The Work at Height Regulations 2005 (WAH), defines working at height as:

a) *work in any place, including a place at or below ground level;*
b) *obtaining access to or egress from such place while at work, except by a staircase in a permanent workplace, where, if measures required by these Regulations were not taken, a person could fall a distance liable to cause personal injury*

Implementing this procedure will ensure work at height activity undertaken at the University of Portsmouth is properly planned, supervised and carried out by competent people.

Legislation

The Work at Height Regulations 2005 (WAHR): Requires the University to ensure that work at height is:

- Properly planned, including the selection of suitable work equipment.
- Appropriately supervised.
- Carried out in a safe manner.

The Provision and Use of Work Equipment Regulations (PUWER) 1998: Applies to all work equipment. The regulations require that:

- Work equipment is suitable for the purpose it is used or provided for, and is properly maintained and inspected at suitable intervals.
- Where the use of work equipment is likely to involve specific risks, the use, maintenance etc. of that equipment is restricted to people given the task of using and/or maintaining it.
- Users, supervisors and managers have received adequate training for the purposes of health and safety.

Lifting Operations and Lifting Equipment Regulations 1998 (LOLER).
Lifting equipment includes any equipment used at work for lifting or lowering loads, including attachments used for anchoring, fixing or supporting it. The Regulations cover a wide range of equipment including, cranes, forklift trucks, lifts, hoists, mobile elevating work platforms, and vehicle inspection platform hoists. The definition also includes lifting accessories such as chains, slings, eye bolts etc.

The Management of Health and Safety at Work Regulations 1999 (MHSWR)
Requires the University to make suitable and sufficient assessment of the risks to the health and safety of employees whilst they are at work and to ensure the health and safety of others (i.e. students, visitors and contractors) arising out of, or in connection with University activity.

Responsibility

Areas of responsibility are defined in the University Health and Safety Policy. This procedure forms part of the University's Health and Safety Policy. Non-compliance with arrangements for managing health and safety may lead to formal action being taken under the University's disciplinary procedure.

Senior Managers are responsible for ensuring that work at height that cannot be avoided in their department/faculty is carried out in accordance with this procedure.

Staff with line management and supervisory roles are responsible for ensuring the safety of work activities, including the implementation and monitoring of health and safety policies.

All staff and students are required to follow all health and safety instructions and to report defective equipment and unsafe practices. Staff and students must ensure:

- Their own health and safety and that of others is not put at risk when carrying out work at height activities. Any problems relating to the activity are reported to staff with supervisory or line management roles.
- They comply with instruction and training which is provided for work at height activities.
- They use all work equipment which has been provided in a safe manner.
- If their health is being affected by their work or their ability to perform their job is impaired by a health issue (e.g. seizures) they should speak to their line manager in the first instance.

Reporting Faults

Staff and students have a duty to report equipment faults/damage and unsafe working practices to their supervisor or line manager. Accident or near miss incidents must be recorded using the HS1 injury/ near miss reporting form.

Arrangements for Working at Height

Planning

Where possible, avoid the need to work at height by conducting as much work as possible from the ground. If working at height cannot be avoided ensure a suitable and sufficient risk assessment is carried out. For routine operations (e.g. carrying out maintenance for a data projector), where the task, height, equipment used and environment are the same a generic risk assessment may be sufficient.

The Health and Safety Executive (HSE) provides guidance for assessing, planning and carrying out work at height in their guidance Working at Height: a Brief Guide and this is summarised in the flow chart at the end of this procedure (see Appendix 1).

Selection of Equipment

If it has been assessed that working at height cannot be avoided, then suitable equipment needs to be selected in order to carry out the task.

All work at height equipment must be suitable for the purpose it is intended, including the environment it is to be used in.

When selecting work at height equipment the following points should be considered:

- Type of Equipment: This should include the type of work that is going to be carried out and the environment where it is going to be used. In most instances this will mean the use of step stools, ladders and stepladders.

- Specialist equipment such as Mobile Elevated Work Platforms (MEWPs) Scaffold Towers and Tallescopes are classified as working at height equipment and are subject to additional regulations under LOLER and PUWER. This type of equipment will require specialist training by the relevant external organisation for certification and is subject to stringent risk assessment, maintenance and inspection regimes. Specialist equipment for working at height is only available for use by trained and competent staff nominated by their department. Please contact the Health and Safety Office for more information.

- Material: Work at height equipment should be constructed from materials suitable for the purpose that they will be used for. For example, a stepladder used for electrical work should be made from a non-conductive material such as glass reinforced plastic (GRP)

  For information about specialist work at height equipment please refer to links in the Further Information section at the end of this document.

- Height: The equipment must be suitable for the height that it is required for and for the person using it, to ensure that they do not have to overreach when carrying out tasks

All work equipment must be maintained and inspected at regular intervals by a competent person (staff who have received Work at Height training at the University) and carry an identification tag in accordance with the University procedures for Working at Height Equipment Register and Inspection.

Frequency of inspection should be determined by the risk assessment. High use equipment should be inspected at three monthly intervals in accordance with the University procedures for Working at Height Equipment Register and Inspection. Low use equipment may require less frequent inspection and testing i.e. a step ladder that is only used annually for putting up Christmas decorations.

From December 31st 2018 new standards have been introduced to replace the old British Standard for domestic, trade and industrial ladders (See figure 2).

There are separate requirements for step stools (EN14183), loft ladders (EN14975), telescopic ladders (EN131-6), mobile ladder with platform (EN131-7) and single or multiple joint ladders (EN131-4).

Key Changes:

- There will be one standard; EN131 which will outline requirements for non-professional and professional ladders (See figure 1).
- For each category the minimum load capacity is 150Kg
- There is no need to replace ladders that are compliant with the old British Standard for Trade and Industrial ladders as long as they are in good condition.

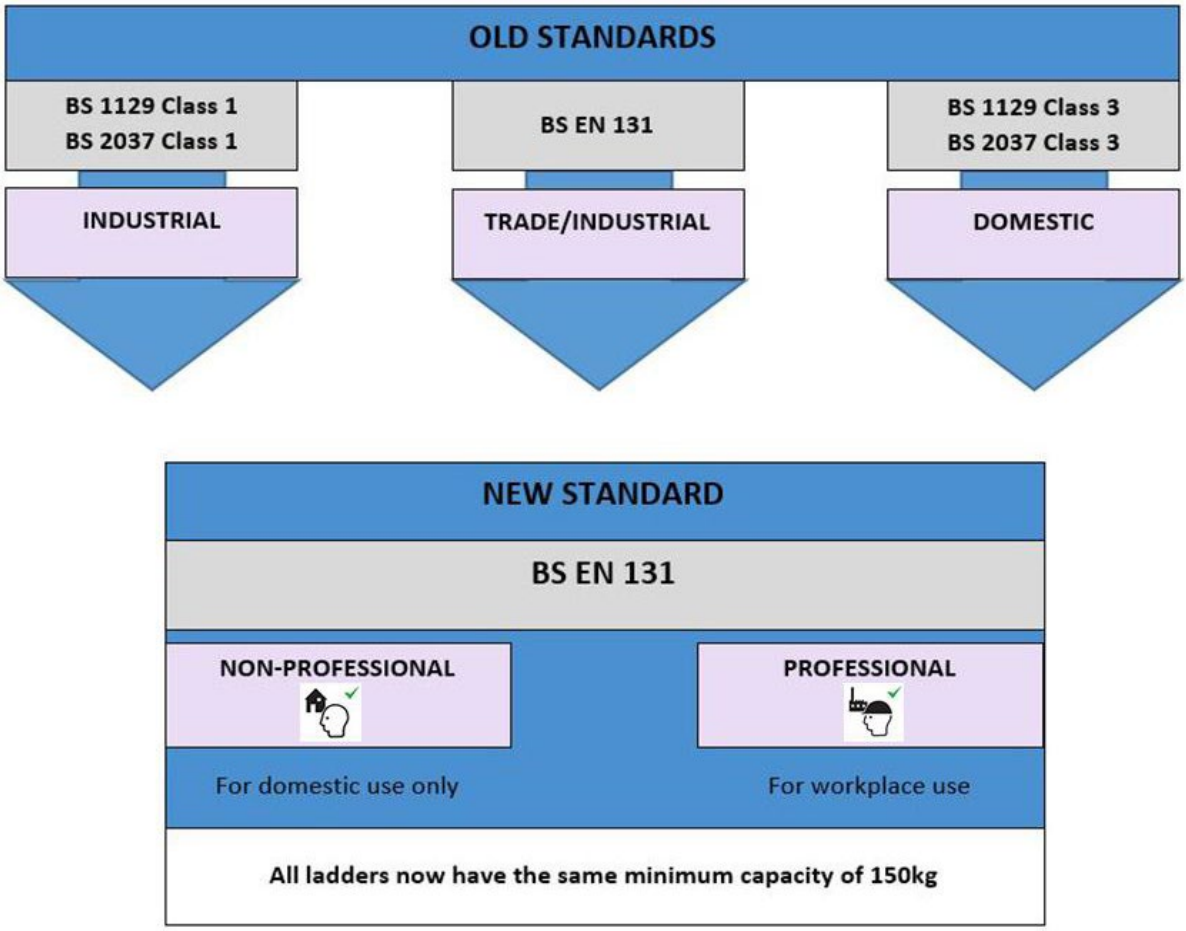
Figure 1: Key changes to EN 131 (Source: Arco)

Non-professional EN 131 (domestic) ladders are prohibited for use in the University, except as props e.g. in a theatre production.

CE Marked Ladders

These should not be used as there is no legal means for a manufacturer to CE mark ladders.

Figure 2: New EN 131 Standard for professional and non-professional ladders



Training
All staff who work at height as a regular feature of their employment must undergo Work at Height Training and there is a requirement for three yearly refresher training. This can be arranged by line managers with the Health and Safety Office.

Students who are involved in work at height as a part of their study (i.e. putting up exhibitions) should attend student training in work at height. Course leaders and tutors should arrange Work at Height training for students with the Health and Safety Office.

Use of Work at Height Equipment
Staff and students who work at height must ensure they use work at height equipment correctly; measures include:

- Ensure equipment is situated on a level surface.
- Do not overload or overreach when working at height.
- If it is not reasonably practicable to prevent objects falling, take suitable and sufficient measures to make sure no one can be injured, e.g. cordon off the area to keep people away.
- Consider emergency evacuation procedures e.g. not obstructing emergency exit routes.

- Consideration should also be given to environmental factors that may compromise safety such as lighting and weather conditions.

Pre-user Checks
All users of work at height equipment should carry out a visual inspection of the equipment prior to using it. Any work at height equipment that appears to be defective should not be used.

All work at height equipment must carry a completed yellow identification tag, displaying when the equipment is due for inspection (see figure 3).

Damaged or faulty work at height equipment should have the yellow ID tag removed, showing the 'Do Not Use' label and be removed from service immediately. Damaged and faulty work at height equipment must be disposed of in accordance with the Estates and Campus Services procedure for disposing of redundant equipment.

Figure 3 Example of an Inspection Tag

Record Keeping
Ladder inspection records should be stored locally within individual Faculties and Departments and must be made available for investigation and auditing purposes.

Further Information

University of Portsmouth: *Inspection, Storage and Issue of Ladders*

University of Portsmouth: *Health and Safety Events Calendar*

HSE guidance (INDG401 rev2) – '*Working at Height - A Brief Guide*'

Health and Safety Executive: '*Safe Use of Work Equipment'* Approved Codes of Practice

Health and Safety Executive: *'Safe Use of Ladders and Step Ladders'*. Guidance.

Use of Specialist Work at Height Equipment

Health and Safety Executive:

'The selection, management and use of mobile elevating work platforms'. Information Sheet.

'Scaffold Towers. What You Need to Do'. Web page.

'Work at Height and use of Tallescopes in Theatres'. Web page.

Other Sources of Information:

The International Powered Access Federation (IPAF). Website.

Prefabricated Access Suppliers' and Manufacturers' Association (PASMA): *'Scaffold Towers'*. Website.

The Association of British Theatre Technicians (ABTT). Website.

ABTT: *'Code of Practice for use of Tallescopes for Working at Height in Theatres'*. Pdf download.

Equality and Diversity

The University's Equality Analysis Impact procedure was used in the development of this procedure and is available on request.

This procedure is subject to review to ensure it is used appropriately and that it meets with the University's commitment to equality and diversity.

Appendix 1

Figure 4 : Source HSE