S31 – Opening Statement

Working at Height

Falls from height are by far the most common cause of workplace deaths and one of the main causes of major injury in the workplace. Latest figures reveal that 46 people died and 3,351 suffered serious injury as a result of a fall from height whilst at work. The majority of injuries sustained in this manner, and typically the most severe, occur within the construction industry and agriculture.

Almost a third of falls are from ladders; however, employees are at risk of falling when working on stepladders, goods vehicles (whilst loading/unloading), tankers (whilst filling), machinery, open edges, roofs, mobile elevated work platforms, and waste containers. There are several factors which contribute to falls from height, consequently the Working At Height Procedure advises responsible managers to:

- Recognise a problem
- Provide safe systems of work
- Ensure that safe systems of work are followed
- Provide adequate information, instruction, training or supervision
- Provide and use appropriate, safe equipment.
S31 – Working at Height

What is this?
This is a written procedure which covers all aspects of identifying, preventing or reducing the risks of working at height.

The person responsible for implementing this procedure is:_____________________________________________________________

What is working at height?
Work at height is defined as ‘work in any place – from which, if no action was taken a person could fall a distance, liable to cause personal injury’. This could be above or below ground level.

I have heard of the ‘hierarchy of control’. What is this?
The ‘hierarchy of control’ (a league table of controls) is a simple process the HSE have introduced to help employers deal with working at height. It is to follow three points:

1. Where possible working at height is avoided.
2. Use work equipment or other measures (MEWP, cherry picker, scaffolding, etc.) to prevent falls where work at height cannot be avoided.
3. Where the risk of a fall cannot be eliminated, use work equipment or other measures (fall restraint and fall arrest equipment, nets, etc.) to minimise the distance and severity of a fall should one occur.

What do we need to do?
The person responsible for implementing this procedure must ensure that:

- A working at height risk assessment is undertaken. This needs to continue for the duration of the work as maintenance activities often create unforeseen at height risks;
- Work at height is properly planned, supervised and controlled;
- Equipment used for work at height is properly inspected and maintained in accordance with manufacturer’s instructions;
- Suitable warning notices are posted;
- Appropriate safety equipment is used;
- All fragile surfaces are clearly marked at ground level;
- People working at height are trained, competent and authorised to undertake the work.

Risks assessments must:

- Be undertaken by a competent person;
- Consider the ‘hierarchy of controls’ and ensure that the most appropriate method of working is selected, and that a record of it is made.
Consider non-workers, the public and others as a priority;
Ensure the place of work, including access and egress, is safe;
Take account of weather conditions that may endanger health and safety, i.e. high winds, lightning, heavy rain, etc.
Ensure risks from fragile surfaces are properly controlled;
Ensure risks from falling objects are minimised;
Plan for emergencies and rescue;
Be explained to all those undertaking work at height;
Consider ground conditions that may affect plant and equipment.

What equipment is needed?
Where a safe place of work cannot be provided the responsible manager must provide equipment for preventing, so far as is reasonably practicable, a fall occurring. If the precautions selected still do not eliminate the risk of falling then they must do all that is reasonably practicable to minimise the distance and severity of a fall.

In selecting equipment for work at height they must:
- Use the most suitable equipment;
- Give collective protective measures such as guard rails priority over personal protective measures, i.e. safety harnesses;
- Take into consideration working conditions and the risks to health and safety of those where the equipment is being used.

Consider using:
- Scaffolding
- Mobile elevated working platforms
- Cherry pickers
- Mobile scaffold tower
- Fall restraint and fall arrest equipment.

Fall restraint and fall arrest equipment
- Fall restraint harness will stop you falling and ensure that you remain in the same position.
- Fall arrest harness allows you to fall for a distance but reduces the impact on your body.

Note: Fall arrest equipment should be issued as a last resort.
Does the workplace and equipment require inspection?

An area where work is to be conducted at height must be inspected on every occasion before it is used.

Equipment must be inspected:

- After it is assembled or installed;
- As often as is necessary to ensure its safety (but no longer than 7 days);
- Before use if it has come from another workplace.

Note: If an item of equipment leaves your workplace it must be accompanied by the latest inspection report.

The person undertaking the inspection must:

- Prepare a report before going off duty; and
- Give the report to the responsible manager within 24 hours of its completion.

The responsible manager must hold printable copies of the report in a safe location:

- On-site until the work is completed; and
- Off-site for a further three months.

Can people work from a ladder?

Ladders are not work platforms; they are used for access and egress. If all other means of safe access have been exhausted and a risk assessment has deemed it acceptable then simple ladder work may be undertaken. The work must be authorised by the responsible manager.

When using a ladder it should be:

- Prevented from slipping;
- Prevented from moving before it is stepped on;
- Long enough to do the job safely;
- Have a handhold available to allow the worker to maintain three points of contact where possible;
- Used without overreaching;
- Inspected and checked regularly where necessary.

Can people work on a fragile roof?

People can only work on a fragile roof if there is no other safe way to perform the work. There must be suitable platforms, coverings and guard rails to limit any risk. Suitable controls must be in place to minimise the distance and severity should a fall occur.

Warning signs must be visible to alert people to the fact that a roof is fragile.
How can falling objects be controlled?

Falling objects can be controlled by ensuring that:

- Nothing is thrown or tipped that may injure someone;
- Items are stored in such a way that movement is unlikely to cause injury;
- Netting is placed around the outside of the work area to capture any falling objects;
- The area below people working at height is clearly indicated and unauthorised people are stopped from entering that area.

On occasions where it is necessary to move objects from a height, then a ‘chute’ should be introduced to safely channel all objects to ground level.

What information needs to be given to employees?

Where other precautions do not entirely eliminate the risk of a fall occurring, the responsible manager must ensure that employees are given information and training on the following:

- How to avoid falling
- How to avoid or minimise injury should a fall occur
- How to perform inspections of equipment

What do employees have to do?

Employees must:

- Use the correct equipment whilst at height
- Inspect all equipment correctly
- Wear the appropriate PPE and report any defects
- Not throw or tip material from height if it is likely to injure someone.

Consultation

Consulting with trade union appointed safety representatives or other employee representatives is a legal requirement. Responsible managers are to discuss with them any issues relating to work at height.

Legislation

- Work at Height Regulations 2005
- Management of Health and Safety at Work Regulations 1999
- Lifting operation and Lifting equipment Regulations 1998
- Construction (Health, Safety and Welfare) Regulations 1996

Note: This list is by no means exhaustive but identifies some of the key pieces of legislation associated with working at height.

Associated documentation

- Ladder inspection form H&SWAH01