WORKING AT HEIGHT POLICY

Executive Summary

Key Messages
- Definition - A place is “at height” if a person could be injured falling from it even if it is at or below ground level for example using a step stool, a step ladder, Mobile Elevated work Platform or roof work/fragile surfaces.
- Identify - Working at height activities need clearly identified
- Eliminate - Avoid working at height wherever possible
- Planning - Any work at height activities need to be properly planned and organised which must be part of a risk assessment and safe system of work process.
- Environment - Where NHS Lothian staff work outdoors then weather conditions must be considered before commencing any work at height
- Supervision - where the risk is greater the work should be subject to an increased level of supervision.
- Training - Those involved in working at height activities that create a significant risk must be trained and competent to undertake that work.
- Equipment - Equipment used for working at height is suitable, sufficient and appropriately inspected prior to use and after. Work Equipment can include Mobile Elevating Working Platforms, Mobile Scaffolding, Ladders and Step Ladders/step stool.
- Falling Objects - The risks from falling objects are properly controlled
- Communication - Due to the wide-ranging considerations necessary to ensure the successful selection of working at height equipment, this policy should be made available to all NHS employees, volunteers, contractors, and sub contractors.
- Risk – To mitigate the risk to the organisation to as low as is reasonably practicable there is an absolute need to have in place a Working at Height Policy

Implementation Standards

Managers
- The manager has identified the employees in his or her area to whom the policy applies and has given the policy (or selected excerpts) to them.
- The manager has assessed the impact of the policy on current working practices, and has an action plan to make all necessary changes to ensure that his or her area complies with the policy.
- The manager has set up systems to provide assurance to him or her that the policy is being implemented as intended in their area of responsibility.

Employees
- The employee has read the policy (or selected excerpts) and considered what it means for him or her, in terms of how to conduct their duties.
- The employee has completed any mandatory education or training that may be required as part of the implementation of the policy.
- The employee has altered working practices as expected by the policy.
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1.0 Introduction

The Work at Height Regulations 2005, apply to all work at height where there is a risk of a fall liable to cause personal injury.

The regulations place a duty of care on Employers, Employees, and any person that controls the work of others (e.g. Facilities/IT), who may contract others (Contractors, Sub Contractors) to work at height.

NHS Lothian will do all that is reasonably practicable to prevent anyone falling from a height whilst they are at work. NHS Lothian will avoid the need to work at height where possible, however, where such work is unavoidable, it will be carried out in accordance with the work at height regulations, and NHS Lothian policy and procedures incorporating risk assessment and safe systems of work.

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 given to the selection and use of work equipment.

* It should be noted that for all Hard Facilities Management (Estates) work at height, the” NHS Lothian Safe System of Working at Safety Rules and Procures 2016 document will support this policy and form the basis for the detailed management and control of working at activities. See Appendix 2.

2.0 Scope

2.1 This policy shall apply to all NHS Lothian employees, including temporary, agency, contractor, sub contractor and volunteer staff, and sets out the roles, responsibilities and arrangements for the management of risks associated with working at height. Work at height activities undertaken can include the following, NB: this list is not exhaustive:

- Estates – Maintenance: Use of step and leaning ladders, use of mobile elevated working platforms and mobile scaffolds.
- IT – Use of ladders for cable access in ceiling and other voids
- Domestic Services – Cleaning/curtain replacement: Use of step ladders/step stool.

3.0 Aims of the Policy

3.1 NHS Lothian will endeavour to avoid working at height activities, however this is not always possible and this Policy describes the actions taken should working at height occur.

3.2 To reduce the risk/likelihood of injury to person(s) working at height. This policy sets out how NHS Lothian will ensure that such risks are eliminated or reduced to the lowest level reasonably practicable.

3.3 NHS Lothian will endeavour to protect staff and other persons to whom it has third party liability, from the effects of working at height and the associated risks, by effective management and completion of full risk assessments incorporating safe systems of work.

3.4 NHS Lothian will through the line management teams ensure that staff are aware of their responsibilities when working at height which includes information, instruction and training.

4.0 Legal Considerations and Definitions
4.1. The Work at Height Regulations 2005 (as amended 2007) requires employers to ensure:

- all work at height is properly planned and organised;
- all work at height takes into account weather conditions that could endanger the health & safety of staff and others who maybe effected by NHS Lothian operations;
- those involved in work at height are suitably trained and competent;
- the place where work is done is safe;
- equipment for work at height is appropriately inspected prior to use and after;
- the risks from fragile surfaces are properly controlled; and
- the risks from falling objects are properly controlled.

4.2. Work at height can include but is not exclusively limited to:

- Working at ground level adjacent to an excavation
- Working below ground level
- Working on roofs
- Working on or around fragile surfaces. NB: (Working on fragile surfaces should be avoided).
- Working from a ladder/stepladder
- Working from a motorised platform (including vehicle tail lifts)
- Working from scaffolding

NB: ‘A person is ‘at height’ if a person could be injured falling from it, even if it is at or below ground level.

5.0 Roles and Responsibilities

The over arching Health & Safety Policy for the organisation sets out the roles and responsibilities for NHS Lothian employees, additional responsibilities to enable the effective management of work at height are detailed below:

5.1 NHS Lothian Board as the employer are ultimately responsible for fulfilling all duties assigned to them in regards to Health and Safety Legislation.

5.2 The Chief Executive has overall responsibility for working at height, and will ensure that Directors, Managers and Employees are aware of, and carry out the roles and responsibilities identified in this policy.

5.1 Senior Managers and Their Management Teams

Senior Managers and their Management Teams whose staff undertake tasks/activities that result in working at height are responsible for ensuring the following:

- That their staff are aware of this policy and the requirements within it.
- That every effort is made to avoid working at height (see flow chart Appendix 1)
- If working at height cannot be avoided then managers must make sure work is properly planned, supervised and carried out by competent people. This includes using the right type of equipment for working at height. Low-risk, relatively straightforward tasks will require less effort when it comes to planning.
- Where work at height activities are identified then a risk assessment should be undertaken before work commences. Should the risk assessment process identify that a significant risk exists then a safe system of work will be developed and then implemented.
• That all staff receive information, appropriate instruction, supervision and training in relation to working at height, the safe systems of work and safe use of any associated equipment
• That all staff who work at height are physically fit to do so.
• That the place where work at height is undertaken (including the means of access) is safe and has control measures in place to prevent a fall (taking into account the demands of the task, equipment and working environment).
• That there is provided suitable and sufficient work at height equipment or other measures to prevent falls where work at height cannot be avoided. Contact either Estates or the Health and Safety Department for guidance on equipment selection.
• An inventory for working at height equipment is kept and recorded at departmental level.
• That they identify, implement and monitor suitable arrangements for the servicing and inspection of equipment where required. Inspection frequency will be determined by the use and location of the equipment.
• That contractors (and subcontractors) employed are competent to work at height and are managed and monitored in accordance with the Control of Contractors Policy.
• Ensure Personal Protective Equipment is provided to staff working at height and fit for purpose.
• Implement all aspects of NHS Lothian’s Adverse Event Management Policy when reporting and investigating all working at height incidents or accidents.

5.3 Employees

• Must inform their line manager of any limitations they may have which may prevent them working at height.
• Ensure that where possible any working at height activity is avoided. If in doubt ask
• Inform their line manager of any work at height activities that they will need to undertake. If in doubt ask
• All polices and procedures designed to minimise incidents and accidents associated with working at height are understood and adhered to. If in doubt ask.
• Assist with the assessment of risks, and comply and adhere to the risk assessment findings and any safe systems of work identified for working at height.
• Report immediately, any working at height adverse events that may cause harm to them or others to their line manager. Record on the NHS Lothian Datix system.
• Immediately inform their line manager if they suspect that the safe system of work in place is ineffective or inadequate.
• Ensure that they wear the appropriate PPE as identified within any task based risk assessment.
• Ensure that any information, instruction and training for working at height is adhered to. If in doubt ask
• Where equipment is provided for working at height it must be used for its intended purpose
• Prior to use inspect ladders paying particular attention to the condition of the rungs, stiles, connectors, treads, crossbar, welds, screws, hinges and built in stability devices.
• Immediately report to their line manager any fault or defect with any work at height equipment and remove from use.

6.0 The Risk Assessment Process

6.1 Planning
Before any work at height is undertaken the following five points must be complied with:

1. all work at height is properly planned and organised
2. those involved in work at height are competent
3. the risks from work at height are assessed, and appropriate work equipment is selected and used
4. where applicable the risks of working on or near fragile surfaces are properly managed
5. the equipment used for work at height is properly inspected and maintained.

6.2 Risk Assessment

When planning work at height there is a need to carry out a suitable and sufficient ‘risk assessment’. The risks for working at height are usually well known and most necessary control measures are easy to apply.

Remember a risk assessment is simply
• a careful examination of the work at height task to identify hazards and
• a consideration of whether the hazards pose a risk that could cause harm to people.

As part of the risk assessment process always consider whether you have taken enough precautions or should do more to prevent harm. An example risk assessment is provided (see Appendix 4) for a working at height task.

If working at height is unavoidable then:

• Use an existing safe place of work to access work at height - don’t cut corners, if there is already a safe means of access such as a permanent stair and guard railed platform use it!
• Provide or use work equipment to prevent falls, such as scaffolding, mobile access towers or mobile elevating work platforms (MEWPs) which have guardrails around the working platform.
• Minimise distance and consequences of a fall, for example by using a properly set up stepladder or ladder within its limitations for low level, short duration work only.
• High risk activities for working at height will require a Permit to Work system. These may include where access is required to any roof area. Increased levels of supervision are required where Permit to Work Systems are used
• In addition where planned work involves the use of cradles or a Mobile Elevated Work Platform or other mechanical means of working at height again increased levels of supervision will be required.
• Ensure that working at height training is provided, reviewed annually and is kept up to date. E.g. authorised person working at height training and ladder awareness training.
• Ensure the provision of emergency and rescue procedures are incorporated within the written safe system of work.

6.3 Active Monitoring

Those managers whose staff work at height should ensure effective implementation of this policy and associated procedure by systematically reviewing compliance through;

• The use of regular Inspections, Safety Walk Rounds or similar checking systems.
• The frequency of the inspections and checks will depend on the level of risk. E.g. high risk working at height tasks will require more frequent checks.
• Reviewing and discussing any local procedures with staff to determine if the safe
systems of work (procedure) is effective.

6.4 Reactive Monitoring

• All work at height incidents and accidents must be reported using the DATIX system
and investigated in line with the requirements of the NHS Lothian Adverse Event
Management Policy.

7.0 Audit and Review

Compliance with the policy will be audited as part of the NHS Lothian internal audit process.
The policy will be reviewed and revised on a regular basis (every 3 years) or sooner as a
result of any changes in legislation and healthcare facilities guidance.

8.0 Equality and Diversity

As per the NHS Lothian Development of NHS Lothian Policies and Procedures – Policies and
Guidance for all Employees, a Rapid Impact Assessment has been undertaken inline with the
requirements of the Equality and Diversity Policy.

9.0 Related Documents


10.0 References

10.1 Health and Safety Executive Guidance and Procedures
1. Safe use of ladders and stepladders (HSE INDG402)
2. Working at Height Regulations 2005 (HSE INDG401)
3. Toolbox talk on leaning ladder and stepladder safety(HSE)
4. Tower Scaffolds (HSE INFO SHT 10 Rev 4)

10.2 Health Facilities Scotland “Standardised Unified Procedures 04 for Working at Height”
13.0 Appendices

Appendix 1

Procedural flow chart for working at height activities

Can Working at Height be avoided?

NO

Plan/organise the working at height activity to be carried out.

Is the activity covered by the permit to work system (Estates)?

YES

Follow the permit system and Estates procedures for safe working at height (appendix 2)

NO

All other Working at Height activities should be covered by a departmental Risk assessment.

YES

Carry out work in a safe manner.
Appendix 2


Document attached

Appendix 3

HSE Guidance documents:

http://www.hse.gov.uk/falls/wait/wait-tool.htm

Appendix 4

Example of a Task Based Risk Assessment for Working at Height
Record of General Risk Assessment

Name of Assessor(s): A.N.Other
Date of Original Assessment: 22-7-16

Manager Responsible: Sum One

Department:

Subject of Assessment: Consider Task or Environment.
Changing Window Curtains

Step 1: What are the Hazards?
1. Use of incorrect / defective equipment
2. Inappropriate use of access equipment
3. Uneven floor causing instability
4. Manual Handling
5. Restricted workspace

Step 2: Who might be harmed and how?
Domestic staff by –
1. Fall from Height
2. Overreaching / Stretching
3. Slips, Trips and Falls
4. Musculoskeletal Injuries
5. See no. 1 & 2

Step 3: What are you already doing? (Existing Precautions)
1. Staff trained and competent in use of access equipment
2. All access equipment (e.g. step ladder / platform) suitable and sufficient for purpose; checked before use and maintained in good condition.
3. Access Equipment is of adequate height for the task.
4. Reporting procedure in place for identified defective equipment with prompt removal/remedial action.
5. Frequent documented checks to ensure safe working condition (at least 6mthly).
6. Appropriate PPE worn (footwear)
7. Window opening limiters in place.
8. All staff trained and competent in use of access equipment
9. Equipment to be repositioned where required to prevent overreaching/stretching
10. Floor surfaces suitable to use – firm and even surface and free from obstacles / substances
11. Staff to be trained in moving and handling techniques
   2 person job – second person available at ground level to hand curtains to/take from

12. Where it is not possible to gain access to corner of windows due to static furniture items present, the curtains should be hung at a position that is free from obstructions and then drawn over whilst at ground level
   Suitable access equipment should be used for the task in hand – consideration of use of a working platform to allow safe access to areas where required (e.g. whilst hanging curtains within side room (one bedded room) where sink provides restricted access)

Level of Risk

Current risk level: Green

Step 4: Action Plan
**What further action is necessary?**

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<th>Action by when (dd/mm/yy)</th>
<th>Action completed. (dd/mm/yy)</th>
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<td>22-07-16</td>
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During any activity that involves working at height the Supervisors will check that the safe system of work is being complied with both prior to and during the task.

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**Step 5: Review Table**

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