

Working at Height Policy



Title:

Working at Height Policy (Health and Safety)

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Author/s:	NHS Lothian Health and Safety Adviser		
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Executive Lead:	NHS Lothian Executive Medical Director		
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Version Control

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Mar 2022	NHSL Health and Safety Adviser	v6.0	Approved by the Policy Approval Group

Executive Summary

The Work at Height Regulations 2005 provides a legal framework to protect people where there is a risk of a fall liable to cause personal injury. The regulations define that a place is “at height” if a person could be injured falling from above, at or below ground level, for example, using a step stool, a step ladder, Mobile Elevating Work Platform, or undertaking roof work/fragile surfaces.

The regulations place duties on employers, and those who control any Work at Height activity (such as Facilities managers, or others who may contract others to work at height), who therefore have a responsibility to manage and minimise the risks from work activities, identify hazards and assess the risks, and put in place actions to prevent and control these risks and review them regularly.

All Work at Height activities must be clearly identified and, wherever possible, working at height should be avoided. It is a requirement of the regulations that work should not be undertaken at height where it is reasonably practicable to carry out the work safely otherwise than at height.

Regular inspection of places of work at height should be undertaken. The regulations clearly state that: ‘Every employer shall, so far as is reasonably practicable, ensure that the surface and every parapet, permanent rail or other such fall protection measure of every place of work at height are checked on each occasion before the place is used’.

All Work at Height activities must be properly planned and organised, forming part of a risk assessment and safe system of work process. Weather conditions must also be considered before commencing any work at height that is undertaken outside.

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1.0 Purpose

The purpose of this policy and its associated procedure is to support managers in the assessment of working at height risks, and to enable NHS Lothian to meet, as a minimum, its statutory duty of managing, controlling and protecting staff and others who may be affected, as far as is reasonably practicable, from the risks that can arise out of working at height.

This policy should be read in conjunction with the NHS Lothian Health and Safety Policy and the Working at Height Procedure.

2.0 Policy statement

The Work at Height Regulations 2005 place duties on employers, and those who control any Work at Height activity (such as Facilities managers, or others who may contract others to work at height), who therefore have a responsibility to manage and minimise the risks from work activities, identify hazards and assess the risks, and put in place actions to prevent and control these risks and review them regularly.

All Work at Height activities must be clearly identified and, wherever possible, working at height should be avoided. It is a requirement of the regulations that work should not be undertaken at height where it is reasonably practicable to carry out the work safely otherwise than at height.

NHS Lothian as an organisation through its management teams will manage and control all reasonably foreseeable risks associated with Working at Height likely to cause harm.

3.0 Scope

This policy applies to all NHS Lothian employees, and all temporary, agency, contractor, sub-contractor and volunteer staff working on behalf of NHS Lothian and on NHS Lothian premises, 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:

- 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
- Administration – Access: Medical records and use of step ladders/step stool
- Clinical – Access: Use of step ladders/step stool

Please note, this list is not exhaustive.

4.0 Definitions

The Work at Height Regulations 2005 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 and Safety of staff and others who may be affected 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 use.
- The risks from fragile surfaces are properly controlled; and
- The risks from falling objects are properly controlled.

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. (Please note that working on or near fragile surfaces should be avoided).
- Working from a ladder/stepladder
- Working from a motorised platform (including vehicle tail lifts)
- Working from scaffolding

Please note that 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 Implementation roles and responsibilities

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

The overarching [NHS Lothian Health and Safety Policy](#) 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 Chief Executive

The Chief Executive has overall executive responsibility for ensuring that all work at height has effective Health and Safety arrangements in place, and will ensure that Directors, Managers and Employees are aware of, and carry out the roles and responsibilities identified in this policy and its associated procedure.

5.2 Senior Managers and their Management Teams

Senior Managers and their Management Teams are responsible for leading on the implementation of this policy and its associated procedure by ensuring that any Work at Height activity is properly planned, supervised, and carried out by competent people, and that effective systems are in place to identify, manage and control risks associated when working at height.

5.3 Employees

Employees must follow this policy and associated procedure, and any other local procedural arrangements designed to minimise adverse events associated with working at height. Employees must report any working at height adverse events that may cause harm to them or others to their line manager immediately. All adverse events associated with working at height must be recorded on the DATIX system.

6.0 Associated materials

[NHS Lothian Working at Height Procedure](#), approved by the NHS Lothian Health and Safety Committee

7.0 Evidence base

- [The Health and Safety at Work etc. Act 1974](#)
- [The Work at Height Regulations 2005](#)
- [The Management of Health and Safety at Work Regulations 1999](#)
- [The Provision and Use of Work Equipment Regulations 1998](#)
- Health and Safety Executive Guidance and Procedures:
 - Safe use of ladders and stepladders
 - Using leaning ladders safely
 - Using stepladders safely

8.0 Stakeholder consultation

This policy was reviewed with engagement from NHS Lothian Hard FM colleagues and presented to the NHS Lothian Health and Safety Committee.

Additionally, the draft version of this policy was placed on the NHS Lothian Consultation Zone to provide stakeholders the opportunity to provide comment and feedback.

9.0 Monitoring and review

The monitoring and implementation of the policy will be through the Health and Safety Management System Quarterly Review process.

This policy will be reviewed every 3 years, as a minimum, or before as a result of any changes in either the level of risk, legislation or Healthcare Facilities guidance.