



Public - To be published on the Trust external website

Working at Height Procedure

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Overarching policy: [Health and Safety Policy](#)

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1 Introduction

The Trust has a legal and moral obligation to manage risk. By following this procedure responsible persons will ensure that the health and safety risks from working at height are adequately controlled.

This procedure links to Our Journey To Change as outlined within the Health and Safety Policy.

2 Purpose

Following this policy will help the Trust to comply with its legal obligations:

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Working at Height Regulations 2005
- Provision and Use of Work Equipment Regulations 1998
- Lifting Operations and Lifting Equipment Regulations 1998

3 Who this procedure applies to

This procedure applies to all bank, locum, permanent, fixed term contract employees (including apprentices) who hold a contract of employment or engaged with the Trust, and seconded (including students), volunteers, non-Executive Directors, Governors, and those undertaking research work within TEWV Trust. It also applies to external contractors, (including Private Finance Initiative (PFI)), agency workers, including those within the Gig Economy and other workers who are assigned to TEWV Trust.

4 Related documents

This procedure describes what you need to do to implement duties under the Trust Health and Safety Policy.

This procedure also refers to:

- ✓ Risk Assessment (H&S) Procedure

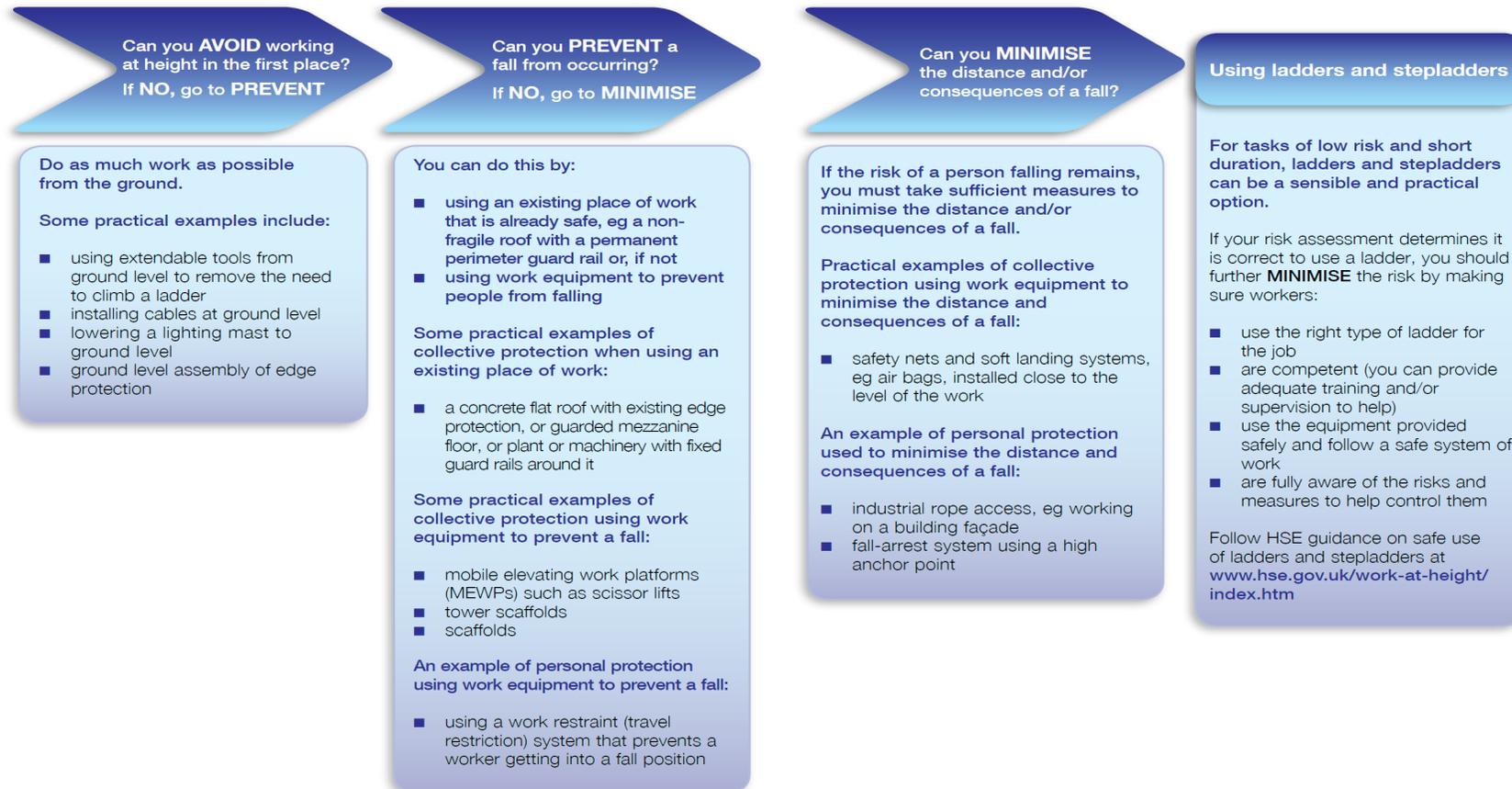
5 Procedure

Managers duties:

- **Avoid** work at height where possible.
- Where work at height cannot be easily avoided, **prevent** falls using either an existing place of work that is already safe or the right type of equipment to prevent the fall.
- Where the risk cannot be eliminated, **minimise** the distance and consequences of a fall by using the right type of equipment.
- For each step, consider measures that protect everyone at risk (**collective protection**) before measures that only protect the individual (**personal protection**).
- Make sure work is properly planned, supervised, and carried out by competent people.
- Carry out a risk assessment in line with the Risk Assessment (H&S) Procedure.
- Identify all hazards and document these and appropriate control measures on a risk assessment.
- Do as much work as possible from the ground.
- Ensure workers can get safely to and from where they work at height.
- Take precautions when working on or near fragile surfaces.
- Provide protection from falling objects.
- Ensure equipment is suitable, stable, and strong enough for the job, maintained and checked regularly.
- Plan and practice emergency evacuation and rescue procedures.

See the following diagram on page 5, which outlines the above:

- Figure 1: Working at Height Step by Step Diagram, HSE INDG401 Working at Height a Brief Guide



For each step, consider what is reasonably practicable and use 'collective protection' before 'personal protection'

Figure 1: Working at Height Step by Step Diagram, HSE INDG401 Working at Height a Brief Guide

5.1 Working at Height

Work at height covers all work activities where there is a potential for falling from a distance liable to cause personal injury. This is regardless of the work equipment being used, the duration the person is at a height or the height at which the work is performed.

Examples of work at height include:

- Using a ladder / stepladder / step-up.
- Working from scaffolds or mobile elevating work platforms.
- Climbing fixed structures.
- Working on fragile surfaces.
- Working at ground level close to an opening in the floor or a hole in the ground.

Work at height does **not** include a slip or a trip on the same level, as a fall from height has to involve a fall from one level to a lower level, nor does it include walking up and down a permanent staircase in a building.

5.1.1. Preventing Accidents and Injuries

Do not:

- Overload ladders – consider the equipment or materials workers are carrying before working at height. Check the pictogram or label on the ladder for information.
- Overreach on ladders or stepladders.
- Rest a ladder against weak upper surfaces, for example glazing or plastic gutters.
- Use ladders or stepladders for strenuous or heavy tasks, only use them for light work of short duration (a maximum of 30 minutes at a time).

5.2 Collective Protection

Collective protection is equipment that does not require the person working at height to act for it to be effective.

Examples are:

- Permanent or temporary guardrails.
- Scissor lifts.
- Tower scaffolds.

5.3 Personal Protection

Personal protection is equipment that requires the individual to act for it to be effective.

An example is putting on a safety harness correctly and connecting it, with an energy-absorbing lanyard, to a suitable anchor point.

5.4 Working Platforms

A working platform can be almost any surface from which work can be carried out, such as:

- A roof.
- A floor.
- A platform on a scaffold.
- A mobile elevating work platform (MEWP).
- Treads of a stepladder.
- Step-ups.

5.5 Ladders / Stepladders

Ladders and stepladders may be used for work at height when a risk assessment has shown that the use of other work equipment is not justified because of the low risk and short duration (short duration means working on a ladder for no more than 30 minutes at a time); or when there are existing workplace or environmental features which cannot be altered.

Three points of contact should always be maintained (this is not limited to hands and feet).

Don't stand and work on the top three steps (including a step forming the very top of the stepladder) unless there is a suitable handhold.

5.6 Visual Inspection and Pre-Use Checks

5.6.1 Visual Inspection and Pre-Use Checks for Ladders and Stepladders

Ladders and stepladders must be checked to make sure that they are suitable for the work task and in safe condition before use.

Ladders and stepladders should only be used if they:

- Are free from visible defects (pre-use checks conducted each working day).
- Have up-to-date record of the detailed visual inspections carried out regularly by a competent person and in accordance with the manufacturer's instructions. (Ladders that are part of a scaffold system should still be inspected every 7 days as part of the scaffold inspection requirements).
- Are suitable for the intended use.
- Have been maintained and stored in accordance with the manufacturer's instructions.

Detailed Visual Inspections

Detailed visual inspections are conducted in accordance with manufacturer's instructions and are used to identify defects.

They can be done in-house by a competent person on a regular basis (i.e., 6 monthly). Detailed visual inspections should be recorded (for example a ladder tag).

Visual inspections look to identify:

- Twisted, bent, or dented **stiles**.
- Cracked, worn, bent or loose **rungs**.
- Missing or damaged **tie-rods**.
- Cracked or damaged welded **joints**, loose **rivets**, or damaged **stays**.

Pre-Use Checks

Before starting a work task, a pre-use check should be carried out to identify any obvious visual defects and to make sure the ladder / stepladder is safe to use.

Pre-use checks should be carried out by the user at the beginning of the working day.

Pre-use checks look to identify:

- Twisted, bent, or damaged **stiles**, as this could cause the ladder to buckle or collapse.
- Missing, worn or damaged **feet** as this could cause the ladder to slip.

- Bent, worn, missing or loose **rungs** as this could cause the ladder to fail.
- Bent or worn fixings of any **locking mechanisms** as this could cause the ladder to collapse.
- Split or buckling of the **stepladder platform** as this could cause the ladder to become unstable or collapse.
- The condition of **steps or treads** on stepladders; if they are contaminated, they could be slippery; if the fixings are loose on steps, they could collapse.

Where defects are identified the ladder should be tagged and quarantined.

Defects should be reported to supervisors / line managers for further action.

5.6.2 Visual Inspection and Pre-Use Checks for Other Equipment

All other equipment should undergo suitable pre-use checks, detailed visual inspections or inspections as specified within the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) and the Provision and Use of Work Equipment Regulations 1998 (PUWER).

5.7 Defective Equipment

Any defective equipment should be:

- Tagged as defective.
- Quarantined.
- Repaired or disposed of.

Supervisors / line managers should be notified, and replacements should be ordered where appropriate.

5.8. Rescues

Rescue typically involves the recovery of a casualty by another person, either remotely or directly.

You must ensure that you have a robust rescue plan in place where there is a risk of a casualty that cannot be easily evacuated.

These should be practiced ensuring they are workable in the event of an emergency.

5.9 Risk Assessment

A risk assessment for work at height should be completed using the rated risk assessment template from the Risk Assessment (H&S) Procedure.

Things to consider:

- Work task(s) being undertaken (e.g., height, duration, nature of task, competency, 3 points of contact available, materials being carried or handled, over-reaching, working side-on, PPE requirements, falling objects, lone working considerations).
- Equipment being used (e.g., suitable, safe, good condition, inspected, weight limit (including items being carried)).
- Environment (e.g., surface condition, fragile surfaces, weather conditions, electricity, locations of doors/windows, overhead obstructions).
- Vehicles or other people in the vicinity.
- Landing zone (i.e., where the staff member will fall on to).
- Appropriate plans devised for emergencies and rescue.

Permits to Work are issued to contractors by Estates in accordance with the Estates Control of Contractors Procedure.

5.9.1 Working at Height Control Measures

There is a simple hierarchy of control measures which should be followed to minimise the risk of falling when working at height. The hierarchy should be followed systematically and only move to the next level when one level is not reasonably practicable.

This means balancing the level of risk against the measures needed to control the risk in terms of money, time, or trouble.

The decision is weighted in favour of health and safety so that the measures are adopted, unless they are grossly disproportionate.

Hierarchy of controls for working at height:

- **Avoid** work at height where reasonably practicable.
- Use work equipment to **prevent** falls where work at height cannot be avoided.
- Where the risk of a fall cannot be eliminated, use work equipment to **minimise** the distance and consequences of a fall if one occurs.
- Always consider measures that protect all those at risk, i.e., **collective** protection measures (scaffolds, nets, soft landing systems) before measures that only protect the individual, i.e., personal protection measures (e.g., a harness).

5.10 Training

You do not need to be formally 'qualified' before using a ladder however you do need to be competent. This means having the necessary skills, knowledge, and experience to perform the task and to use a ladder properly for the work task to be conducted. If you are still being trained, are a young worker, apprentice etc., you will need to work under the supervision of somebody who can perform the task competently.

In the case of low-risk, short duration tasks involving ladders, competence requirements may be no more than making sure workers receive instruction on how to use the equipment safely (e.g., how to tie a ladder properly) and appropriate training.

When a more technical level of competence is required, for example drawing up a plan for assembling a complex scaffold, existing training and certification schemes drawn up by trade associations and industry is one way to help demonstrate competence.

6 Health, Safety and Security Team

The Health, Safety and Security Team (which also includes a Local Security Management Specialist) provides advice and support to all staff and managers around the management of risk.

7 Definitions

Term	Definition
Working at Height	<p>HSE:</p> <ul style="list-style-type: none"> ‘Work at height’ means work in any place where, if there were no precautions in place, a person could fall a distance liable to cause personal injury.’

8 How this procedure will be implemented

<ul style="list-style-type: none"> This procedure will be published on the Trust’s intranet.
<ul style="list-style-type: none"> Line managers will disseminate this procedure to all Trust employees through a line management briefing.
<ul style="list-style-type: none"> Line managers to ensure that the appropriate staff are booked on to the courses identified in the below training needs analysis and the examination (where applicable) is successfully completed.

8.1 Training needs analysis

Staff/Professional Group	Type of Training	Duration	Frequency of Training
Estates	Local Induction Working at Height training Toolbox talks		Commencement of employment for role. As required and based on level of risk.
Hotel Services (i.e., Housekeepers / Porters etc.)	Local Induction Toolbox talks		Commencement of employment for role. As required and based on level of risk.
Pharmacy	Local Induction Toolbox talks		Commencement of employment for role. As required and based on level of risk.
Other Groups	Local Induction Toolbox talks		As and when required dependent on the level of risk.

9 How the implementation of this procedure will be monitored

Number	Auditable Standard/Key Performance Indicators	Frequency/Method/Person Responsible	Where results and any Associate Action Plan will be reported to, implemented and monitored; (this will usually be via the relevant Governance Group).
1	Compliance with the legal requirements outlined within the Management of Health and Safety at Work Regulations 1999. <i>NB. There are 14 questions listed in the audit template that are assessed for compliance.</i>	<p>Frequency: Annual rolling audit programme.</p> <p>Method: Risk Assessment audits will be carried for a sample of all teams utilising standard audit templates via an internet-based audit platform (iAuditor). Results are collated and discussed at Health, Safety, Security and Fire Group (HSSF GROUP) with quarterly report to be submitted to Quality Assurance Committee (QAC).</p> <p>Responsible: Undertaken by members of the Health and Safety Team as directed by the Head of Health, Safety and Security.</p>	Implementation and monitoring are directed by Quality Assurance Committee (QAC) and devolved to the HSSF Group.

10 References

- ✓ Health and Safety at Work etc. Act 1974
- ✓ The Management of Health and Safety at Work Regulations 1999
- ✓ The Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)
- ✓ Provision and Use of Work Equipment Regulations 1998 (PUWER)
- ✓ Working at Height Regulations 2005
- ✓ Workplace (Health, Safety and Welfare) Regulations 1992
- ✓ HSE Guidance Note: INDG 401 (Rev2) – Working at Height a Brief Guide
- ✓ Safe use of ladders and stepladders: A brief guide LA455
- ✓ Health and safety in roof work Guidance HSG33

11 Document control (external)

To be recorded on the policy register by Policy Coordinator

Date of approval	18 July 2023
Next review date	July 2026
This document replaces	HS-0001-015-v2
This document was approved by	Health, Safety, Security and Fire Group
This document was approved	18 July 2023
This document was ratified by	EFM DMT
This document was ratified	13 July 2023
An equality analysis was completed on this policy on	17 May 2023
Document type	Public
FOI Clause (Private documents only)	n/a

Change record

Version	Date	Amendment details	Status
V1	Aug 2020	New document to cover working at height procedure as formerly covered in Slips, Trips and Falls (Visitors and Staff) Procedure.	withdrawn
V2	18 Jul 2023	Full review: Clarified and updated the wording. Added Figure 1 on page 6. Removed Appendix 1.	Withdrawn
V2.1	23 Oct 2023	Minor amendment to correct EIA, section 1, Title : to 'Working at Height Procedure'. Note – no formal approval required for this change.	Approved

Appendix 1 - Equality Analysis Screening Form

Please note: The Equality Analysis Policy and Equality Analysis Guidance can be found on the policy pages of the intranet

Section 1	Scope
Name of service area/directorate/department	Health & Safety, EFM
Title	Working at Height Procedure
Type	Procedure
Geographical area covered	Trust wide
Aims and objectives	<p>The objectives of this procedure are to:</p> <ul style="list-style-type: none"> • Comply at all times with the Health and Safety at Work etc. Act 1974 etc., the Management of Health and Safety at Work Regulations 1999, the Working at Height Regulations 2005 and all other relevant statutory provisions. • Manage health and safety effectively to improve the quality of patient care, visitors and working conditions of staff and others.
Start date of Equality Analysis Screening	05 May 2023
End date of Equality Analysis Screening	17 May 2023

Section 2	Impacts
Who does the Policy, Service, Function, Strategy, Code of practice, Guidance, Project or Business plan benefit?	All staff, patients, contractors and visitors and the general community.
Will the Policy, Service, Function, Strategy, Code of practice, Guidance, Project or Business plan impact negatively on any of the protected characteristic groups?	<ul style="list-style-type: none"> • Race (including Gypsy and Traveller) NO • Disability (includes physical, learning, mental health, sensory and medical disabilities) NO • Sex (Men, women and gender neutral etc.) NO

	<ul style="list-style-type: none"> • Gender reassignment (Transgender and gender identity) NO • Sexual Orientation (Lesbian, Gay, Bisexual, Heterosexual, Pansexual and Asexual etc.) NO • Age (includes, young people, older people – people of all ages) NO • Religion or Belief (includes faith groups, atheism and philosophical beliefs) NO • Pregnancy and Maternity (includes pregnancy, women who are breastfeeding and women on maternity leave) NO • Marriage and Civil Partnership (includes opposite and same sex couples who are married or civil partners) NO • Armed Forces (includes serving armed forces personnel, reservists, veterans and their families) NO
Describe any negative impacts	There will be times when health and safety has to take priority and this may have an impact on a person's protected characteristics. TEWV would however always try and mitigate as much as possible any negative impact whilst ensuring health and safety legislation is followed.
Describe any positive impacts	Procedure is in place to reduce risk to all staff, patients, visitors, contractors etc.

Section 3	Research and involvement
What sources of information have you considered? (e.g. legislation, codes of practice, best practice, nice guidelines, CQC reports or feedback etc.)	Health & Safety at Work Act 1974 Management of Health and Safety at Work Regulations 1999 (MHSWR) Working at Height Regulations 2005
Have you engaged or consulted with service users, carers, staff and other stakeholders including people from the protected groups?	Yes

If you answered Yes above, describe the engagement and involvement that has taken place	Programme of visits and audits have been undertaken where concerns have been discussed and documented. These have been considered while reviewing the procedure.
If you answered No above, describe future plans that you may have to engage and involve people from different groups	

Section 4	Training needs
As part of this equality analysis have any training needs/service needs been identified?	No
Describe any training needs for Trust staff	N/A
Describe any training needs for patients	N/A
Describe any training needs for contractors or other outside agencies	N/A

Check the information you have provided and ensure additional evidence can be provided if asked.

Appendix 2 – Approval checklist

	Title of document being reviewed:	Yes / No / Not applicable	Comments
1.	Title		
	Is the title clear and unambiguous?	Yes	
	Is it clear whether the document is a guideline, policy, protocol or standard?	Yes	
2.	Rationale		
	Are reasons for development of the document stated?	Yes	
3.	Development Process		
	Are people involved in the development identified?	Yes	
	Has relevant expertise has been sought/used?	Yes	
	Is there evidence of consultation with stakeholders and users?	Yes	
	Have any related documents or documents that are impacted by this change been identified and updated?	Yes	
4.	Content		
	Is the objective of the document clear?	Yes	
	Is the target population clear and unambiguous?	Yes	
	Are the intended outcomes described?	Yes	
	Are the statements clear and unambiguous?	Yes	
5.	Evidence Base		
	Is the type of evidence to support the document identified explicitly?	Yes	
	Are key references cited?	Yes	
	Are supporting documents referenced?	Yes	
6.	Training		
	Have training needs been considered?	Yes	
	Are training needs included in the document?	Yes	
7.	Implementation and monitoring		

	Title of document being reviewed:	Yes / No / Not applicable	Comments
	Does the document identify how it will be implemented and monitored?	Yes	
8.	Equality analysis		
	Has an equality analysis been completed for the document?	Yes	
	Have Equality and Diversity reviewed and approved the equality analysis?	Yes	17 May 2023
9.	Approval		
	Does the document identify which committee/group will approve it?	Yes	
10.	Publication		
	Has the policy been reviewed for harm?	Yes	
	Does the document identify whether it is private or public?	Yes	Public.
	If private, does the document identify which clause of the Freedom of Information Act 2000 applies?	N/a	