

ROYAL HOLLOWAY, UNIVERSITY OF LONDON

WORK AT HEIGHT

POLICY AND PROCEDURE

(Version 2)

1 Introduction

This Policy reflects the College's commitment to meeting the requirements of the Work at Height Regulations 2005. It identifies the duties of each head of department/school/director (hereafter referred to as 'managers') and provides guidance to those charged on their behalf with taking action necessary to ensure compliance. The extent of such action will be dependant on the level of risk of each activity undertaken 'at height'. In the majority of departments, the work involved is likely to be minimal, however, where work at height is a more significant issue, the requirement to manage it will be more onerous.

The Policy is not intended to provide definitive guidance to the Regulations and where any doubt exists as to the action to be taken or advice or assistance being required, contact should be made with the College Health and Safety Office.

The Work at Height Regulations 2005 apply to all work undertaken at height wherever there is the potential for a fall to occur which may cause personal injury. No height limits are specified in the Regulations in recognition that all work undertaken at height has the ability to result in injury. The Regulations apply to work undertaken inside or outside of buildings and place duties on employers, the self-employed and any person who controls the work of others e.g. Estate Services, to the extent that they control the work.

The Regulations do not apply to the provision of paid instruction or leadership in caving or climbing undertaken for sport, recreation, teambuilding, or similar activities.

Work at height will range from the routine use of a stepladder to retrieve files on shelving which is an activity undertaken in many departments, to potentially higher risk activities undertaken by, or under the control of Estate Services such as on the roofs of College buildings which could present unusual and difficult access issues. Specific work undertaken in other departments, for example, Drama and Theatre and Media Arts, is also frequently undertaken at height and presents particular risks. This Policy will, therefore, need to be read in conjunction with all activities involving work at height in order to minimise any risk of injury occurring.

2 Addressing Departmental Risks Arising from Work at Height

In view of the broad definition of 'work at height', it is likely that this Policy will be applicable to every department. For the majority, it will involve situations such as the stepladder example already given. This will require a risk assessment of the task(s)

followed by instructions to the staff in what to do and not do, including not standing on chairs, always using a stepladder and not overreaching.

Risk assessments must be undertaken by a trained member of a department's staff. Training in undertaking these, including instruction for those working at height, will be provided by members of the College Health and Safety Office.

For those departments in which more significant risks exist, comprehensive risk assessments will be required to identify how tasks are to be undertaken and the equipment, training and other elements necessary. Training in these situations will either be provided or approved by the College Health and Safety Office. The extent of the work required in each department will be dependant on the level of risk involved in the activities undertaken.

3 Requirements of this Policy

The Work at Height Regulations and this Policy require managers to do all that is reasonably practicable to prevent anyone falling and set out the following simple hierarchy for managing and selecting equipment for work at height:

- *avoid work at height wherever possible;*
- *use work equipment or other measures to prevent falls where working at height cannot be avoided; and*
- *where the risk of a fall cannot be eliminated, use work equipment or other measures to minimise the distance and consequences of a fall should one occur.*

These duties require that:

- a) all work at height is properly planned and organised;
- b) where applicable, all work at height takes account of weather conditions that could endanger health and safety;
- c) those involved in work at height are trained and competent to do so;
- d) the place where work at height is undertaken is safe;
- e) equipment used for work at height is appropriately selected, used, inspected and maintained;
- f) the risks from fragile surfaces are properly controlled; and
- g) the risks from falling objects are properly controlled.

The above measures require that the risks arising from such work is, therefore, risk assessed and that risk control measures commensurate with those risks are implemented. Managers must ensure that:

- no work is undertaken at height if it is safe and reasonably practicable to do it other than at height;
- the work is properly planned, appropriately supervised and carried out in as safe a way as is reasonably practicable;
- they plan for emergencies and rescue;
- they take account of the findings of the risk assessment referred to above.

Staff must:

- Report to their line manager any safety hazards associated with work at height;

- Use the equipment supplied (including any safety devices) correctly, follow the training and instruction given unless it is believed that doing so would be unsafe, in which case they must seek further instructions from their line manager before proceeding.

If additional information is required in undertaking the risk assessment process for a specific project, the College Health and Safety Office must be consulted.

Staff Training

Managers must ensure that everyone involved in work at height is competent to do so, having received suitable and sufficient information, instruction and training and while being trained, is supervised by a competent person. It will also necessitate an appropriate training element in the organisation, planning, supervision, and supply and maintenance of the work and equipment used for such purposes.

Any training in conjunction with work at height will be either provided or approved by the College Health and Safety Office.

The Place Where Work is Undertaken

Where work is undertaken at height, which includes the means of access, it must be able to be undertaken safely and have appropriate features to prevent a fall, unless this would mean that it is not reasonably practicable for the worker to carry out the task safely (taking into account the demands of the task, equipment and working environment). Detailed safety requirements relating to where work is undertaken at height are set out in the Schedule to the Regulations and should be consulted where further information is required.

When selecting equipment for work at height:

- Use the most suitable work equipment;
- Give collective protection measures (e.g. guard rails) priority over personal protection measures (e.g. safety harnesses);
- Take account of:
 - the working conditions; and
 - risks to the safety of all those at the place where the work equipment is to be used.

Arrangements must be made to ensure that all equipment, temporary structures (e.g. scaffolding) and safety features comply with the detailed requirements of Schedules 2 to 6, including other relevant legislation.

The Schedules to the Regulations provide the specific requirements for places of work and means of access for work at height. They cover fall prevention measures such as guardrails and working platforms, fall arrest measures such as nets and airbags, personal fall protection such as work restraints, fall arrests and rope access, and ladders. Information to assist with the management of these issues is, therefore, covered in the following Schedules to the Work at Height Regulations:

The Schedules to the Regulations

The Schedules to the Regulations cover:	Schedule No.
Existing places of work and means of access for work at height	1
Collective fall prevention (e.g. guard rails and toe boards)	2
Working platforms	3
Collective fall arrest (e.g. nets, airbags etc.)	4
Personal fall protection (e.g. work restraints, work positioning, fall arrest and rope access)	5
Ladders and step ladders	6
Inspection reports (for working platforms in construction only)	7
Revocations	8

4 Meeting the Requirements of the Regulations

By following good practice in the management of work at height, departments should already be taking sufficient measures to meet the requirements of the Regulations and will, therefore, be protecting persons being required to undertake such work from potential danger. In accordance with normal College Policy, managers will ensure that risk assessments are in place and are reviewed at the intervals identified to be necessary.

Managers will also take appropriate measures as are necessary to ensure that all work at height is planned, organised and undertaken by competent persons and that the measures identified in Section 3 above are followed. They will also ensure that only the most appropriate work equipment is used and that measures to prevent falls (e.g. guardrails and working platforms) are in place before arrangements that may only mitigate the distance and consequences of a fall (e.g. nets).

The Estate Department has responsibility for ensuring that all fragile roofs are hazard signed.

Each department's compliance with the requirements of this Policy will be reviewed by members of the Health and Safety Office during the health and safety audit process.

This Policy forms part of the College's Health and Safety Policy.

Definition of "Reasonably Practicable": *Place on one hand the quantum level of risk and on the other the money, time, or trouble involved in averting the risk. If there is a gross disproportion between them with the risk being insignificant in relation to the sacrifice then you will have proven that compliance was not reasonably practicable.*

Dr Richard Fisk
Health & Safety Adviser
Version 2 (reviewed with no changes)
16th June 2010

'In accordance with the College's commitment to equality and diversity, this Policy has been written and screened to avoid discrimination and promote a positive approach to race, disability and gender issues. Comments on the content of this document should be directed to Mrs Leanie DuToit in the College Health and Safety Office.'