1. Introduction

Falls from height are the biggest cause of workplace deaths in the UK and one of the main causes of major injuries. In 2020/21 falls from height accounted for nearly one in four workplace fatalities (25%).

The Work at Height Regulations 2005 was enacted to protect staff and others against risks to their health and safety while working at height. The amended 2005 regulations removed the definition of 'Work at Height' being at least two metres, and placed no minimum height at which Work at Height considerations apply.

Work at Height should be avoided where possible. But when this is not possible a suitable and sufficient risk assessment must be undertaken and a safe system of work implemented. 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 taken in the selection and use of work equipment, including ladders. This policy and procedure is applicable to all staff, contractors and personnel working for the production.

2. Definitions

Work at Height - This is work in any place at, above or below ground level where a person could be injured if they fell from that place. This can also include means of access and/or egress to a place of work. Work at Height does not include slip, trip or fall on the same level, nor does it include walking up or down a permanent staircase in a building

Work Equipment - Means any machinery, appliance, apparatus, tool or installation for use at work (Provision and Use of Work Equipment Regulations 1998)

3. Responsibilities

3.1 HoD's / Supervisors

- Ensure that every effort is made to avoid working at height and that where is cannot be avoided a suitable and sufficient risk assessment is undertaken before the work is carried out
- Provide suitable work equipment or other measures such as guard rails, to prevent falls where work at height cannot be avoided and ensure that all work at height is being properly maintained and inspected
- Ensure that a method statement, which includes emergency procedures, has been developed prior to working, except for the

simplest activities where the precautions are straightforward and easily repeated.
- Ensure that a 'Permit to Work' has been raised and communicated to those undertaking the work
- Ensure that any equipment purchased is suitable
- Ensure that all staff working at height have appropriate information, instruction, training and supervision to ensure their competence
- Ensure that vendors / subcontractors do not start any work at height without having provided a suitable risk assessment and method statement
- Ensure that all vendors / subcontractors employed are competent to work at height and are appropriately supervised when on site.

3.2 Production H&S department
- Shall not issue any permits for work being undertaken by themselves unless countersigned by another PTW issuer
- Ensure that all necessary precautions, including emergency procedures, have been communicated to the persons in charge of the work
- Assess all associated risks involved in working at height and develop a safe system of work, including the selection, and the appropriate inspection of suitable equipment, where necessary
- Be responsible for the issuing of the working at heights permits, for the management of crew, vendors and subcontractors while they are on site and the cancellation working at heights permits
- Assist in the development and undertaking of audits concerning working at height and associated equipment
- Develop and put into place working at height training for crew, vendors and subcontractors to ensure safe use of any work at height equipment
- Be responsible for the maintenance of this policy and procedure

3.3 Crew, Vendors and Subcontractors
- Assist line management with the assessment of risks with regard to working at height
- Inform them if the system of work is inadequate, and do not work in the area until informed it is safe to do so
- Comply with any method statement developed through risk assessment and any permit to work requirements
- Report all accidents and incidents (including near misses), or any defects in equipment
- Ensure that pre-use checks of equipment and reporting of defects is undertaken

4. Procedures

4.1 Ladders, Step-ladders and Step-stools

Taken from INDG455 Safe Use of Ladders and Step-ladders (https://ladderassociation.org.uk/wp-content/uploads/2021/07/LA455-Safe-Use-of-Ladders-and-Stepladders-A-brief-guide.pdf)
Ladders can be used for low-risk, short duration activities that do not require higher level fall protection. As a guide ladders and step ladders should be used for no more than **30 minutes.**

4.1.1 Using Ladders

Training is required in the safe use of ladders and users must be deemed competent to be able to use the equipment safely. The operator must have read and signed the productionis risk guidance for using ladders.

4.1.2 Pre-Use checks

A pre-use check of ladders should be carried out:

- By the user
- At the beginning of the working day
- After something has changed e.g. if the ladder has been dropped or damaged, moved from a dirty to a clean area etc.

Items to check

- The Stiles – ensure they are not bent or damaged, as the ladder could buckle or collapse
- The Feet – if they are missing, worn or damaged the ladder could slip. Also check the ladder feet if moving from soft/dirty ground to smooth, solid surfaces to make sure that there is nothing embedded to prevent the feet from making contact with the ground
- The Rungs – if they are bent, worn, missing or loose the ladder could fall
- Any Locking Mechanisms – if they are bent of the fixings are worn or damaged the ladder could collapse. Ensure that any locking bars are engaged.
- Stepladder platform – if it is split of buckled the ladder could become unstable or collapse
- Steps or treads on stepladders – if they are contaminated they could be slippery, if the fixings are loose on steps, they could collapse

If the ladder fails any of these checks, remove the ladder from service and inform your HoD or Supervisor.

4.1.3 Using ladders safely

Simple precautions to minimise the risk of a fall:
Leaning Ladders

- Only carry light materials
- Don't overreach
- Make sure the ladder is long enough or high enough for the task
- Don't overload the ladder, check the pictogram or information on the ladder
- Make sure the ladder is at 75°
- Always grip ladders and face the ladder rungs while climbing or descending
- Don't move or extend ladders while standing on the rungs
- Don't work off the top three rungs and make sure the ladder extends at least 1m above where you are working
- Avoid holding items when climbing Maintain three points of contact when climbing (one hand and two feet)

Stepladders

- Check all four step ladder feet are in contact with the ground and the steps are level
- Only carry light materials and tools
- Don't overreach
- Don't stand or work on the top three steps
- Ensure any locking devices are engaged
- Try and position the stepladder to face the work activity and not side on
- Try to avoid work that imposes a side loading
- Maintain three points of contact at the working position (two feet and one hand)

4.2 Working with Mobile Scaffolds

Taken from HSE
(http://www.hse.gov.uk/construction/safetytopics/scaffold.htm)

Towers should be erected by trained and competent people. There are a number of organisations that provide training for the safe erection and use of tower scaffolds.

The incidents that occur are mainly caused by:

- Dangerous methods of erection or dismantling – where a safe system is not being followed;
- Defects in the erected scaffold – where the tower structure is incorrectly assembled or where a platform guardrail is missing;
- Misuse of the scaffold – where a ladder is used on a tower causing it to overturn or when a person falls while the tower is being moved

4.2.1 Erection and dismantling

The manufacturer, supplier or hirer has a duty to provide an instruction manual explaining the erection sequence, including any bracing requirements.
Towers should be erected following a safe method of work, either using:

- Advance guard rail system – where temporary guard rail units are locked in place from the level below and moved up to the platform level. They are in place before the operator accesses the platform to fit the permanent guard rails.
- 'Through-the-trap' (3T) – involves the operator taking up a working position in the trap door of the platform, from where they can add or remove the components which act as the guard rails on the level above the platform. It is designed to ensure that the operator does not stand on an unguarded platform.

4.2.2.Stability

To maintain tower stability you must make sure:

- The tower is resting on firm, level ground with the locked castors or base plates properly supported. Never use bricks or building blocks to take the weight of any part of the tower; stabilisers or outriggers are installed when required by the instruction manual;
- That a tower is never erected to a height above that recommended by the manufacturer

4.2.3.Precautions and inspection

Tower scaffolds must comply with the standard required for all types of scaffolds, e.g. double guardrails, toeboards, bracing and access ladder. When the tower is purchased or hired it should arrive with all the necessary components to prevent falls and ensure stability. Towers rely on all parts being in place to ensure adequate strength. They can collapse if sections are left out. All towers must be inspected following assembly and then at suitable regular intervals by a competent person. In addition, if the tower is used for construction work and a person could fall 2 metres or more from the working platform, then it must be inspected following assembly and then every 7 days. Stop work if the inspection shows it is not safe to continue, and put right any faults. The result of an inspection should be recorded and kept until the next inspection is recorded.

4.2.4.Using and moving

Make sure everyone involved is aware of, and follows, these simple rules:
Using
Never use a tower:

- In strong winds
- As a support for ladders, trestles or other access equipment

- With broken or missing parts
- With incompatible components

Moving
When moving a tower you should always:

- Reduce the height to a maximum of 4m
- Check that there are no power lines or other obstructions overhead
- Check that the ground is firm, level and free from potholes
- Push or pull using manual effort from the base only.

Never move a tower while people or materials are on the tower, or in windy conditions.

4.3 Working with MEWPS

Taken from HSE (https://www.hse.gov.uk/construction/safetytopics/mewp.htm)

The most significant MEWP dangers arise from operation and use of the machine rather than from their movement as a site vehicle.

However, a safe workplace for all vehicle operations needs to be established by separating pedestrians and vehicles and providing hazard-free traffic routes.

4.3.1 MEWP Hazards

Most fatal and serious injuries involving MEWPs arise from:

- Entrapment: operator trapped between part of the basket and a fixed structure, eg when manoeuvring in confined overhead areas of steelwork. Operators may become trapped against the platform controls, and if this happens they may not be able to stop the machine running.
- Overturning: the machine may overturn throwing the operator from the basket
- Falling: an operator may fall from the basket during work activities; and
- Collision: the vehicle may collide with pedestrians, overhead cables or nearby vehicles.

These hazards should be identified within a risk assessment and suitable control measures put in place.

4.3.2 Controlling the risk

It is important to select the right MEWP for the job and site.

Have a plan for rescuing someone from a MEWP and practise it – someone on the ground should know what to do in an emergency and how to operate the machine's ground controls.

There are a number of precautions that can reduce the risk from MEWP hazards. These are:

- Confined overhead working: Brief operators on the dangers, and the safe system of work to be followed. If there are overhead structures against which an operator could be trapped and then pushed onto the MEWP controls, consider selecting a MEWP that has been designed to prevent such accidental contact.
  MEWPs with shrouded or otherwise protected controls are available. Keeping the platform tidy will reduce the risk of the operator tripping or losing balance while in the basket.
- Ground conditions: The platform should be used on firm and level ground. Any temporary covers should be strong enough to withstand the applied pressure. Localised ground features, e.g. trenches, manholes and uncompacted backfill, can all lead to overturning.
- Outriggers: Outriggers must be extended and choked before raising the platform. Spreader plates may be necessary – check the equipment manual.
- Guardrails: Make sure the work platform is fitted with effective guardrails and toe boards.
- Arresting falls: if there is still a risk of people falling from the platform a harness with a short work restraint lanyard must be secured to a suitable manufacturer-provided anchorage point within the basket to stop the wearer from getting into a position where they could fall from the carrier.
- Falling objects: barrier off the area around the platform so that falling tools or objects do not strike people below.
- Weather: high winds can tilt platforms and make them unstable. Set a maximum safe wind speed for operation. Storms and snow falls can also damage platforms. Inspect the platform before use after severe weather.
- Handling materials: if used to install materials check the weight and dimensions of materials and consider any manual handling and load distribution issues. You may need additional lifting equipment to transport materials to the work position.
- Nearby hazards: do not operate a MEWP close to overhead cables or other dangerous machinery, or allow any part of the arm to protrude into a traffic route

4.3.3 Training and competence

MEWP operators should have attended a recognised operator training course and received a certificate, card or 'licence', listing the categories of MEWP the bearer is trained to operate.

The expiry date of the training licence or card should be checked.

In addition to formal training for the type of MEWP, operators should have familiarisation training on the controls and operation of the specific make and model of MEWP they are using.

4.3.4 Inspection, maintenance and examination

A programme of daily visual checks, regular inspections and servicing schedules should be established in accordance with the manufacturer's instructions and the risks associated with each MEWP.

Operators should be encouraged to report defects or problems. Reported problems should be put right quickly and the MEWP taken out of service if the item is safety critical.

The MEWP must be thoroughly examined at least every six months by a competent person or in accordance with an examination scheme drawn up by such a competent person.

5. Risk Assessment Guidance

In the event that work at height cannot be avoided, a suitable and sufficient risk assessment **MUST** be undertaken. The outcomes of this risk assessment must provide the evidence for the development of a safe system of work, which includes the provision of emergency procedures. If the risks are significant, the assessment and the method statement (safe system of work) must be written down.

5.1 Assessing the Risks

When assessing risk, all available information about the work to be undertaken needs to be available and consulted. All foreseeable risks must be considered in advance and the following may need to be considered.

- Working at height without adequate fixed protection
- Working from a ladder
- Working from a scaffold or scaffold tower
- Working from a MEWP

5.2. Areas for consideration in the assessment

- The work being undertaken
- Frequency of access
- Duration of the work
- Location in relation to the presence of hazards e.g. overhead services etc.
- The working environment with regard to weather and lighting
- Safe means of access and egress
- Lone working
- Condition and stability of work surfaces such as fragile materials, slippery surfaces etc.
- Physical capabilities of the workers such as pregnancy or vertigo sufferers
- Falling objects
- Impact on adjacent work activities, or passage of staff adjacent to work at height
- Prevention of access by unauthorised persons

5.3. Developing a Method Statement

In the development of a written method statement, the information gathered during the risk assessment will be used to develop a document that will give information and instruction to the employee who is carrying out the work.
It will also detail, where necessary:

- Collective fall protection
- Personal fall arrest
- Requirements for inspection
- The means of preventing unauthorised access to the area underneath the work being carried out
- Any supervision that may be necessary
- Any weather conditions that workers may be exposed to e.g. ice roofs, slippery surfaces in the rain, wind etc.
- Any emergency or rescue conditions e.g. it is not acceptable just to reply on the emergency services, this needs to be covered in the risk assessment and planned prior to the work being carried out

Collective measures such as guard rails etc. should be deployed in the first instance rather than personal protection. Fall arrest/restraint equipment should be the last, as defined in the hierarchy of control as Personal Protective Equipment (PPE).

5.4. Rescue Plan

Any method statement must include a rescue that considers how an injured worker could be removed safely. The speed of response is an essential consideration, especially when a safety harness is being used as a control measure. Persons suspended in a harness can become unresponsive in as

little as five minutes and may be fatally injured in 15 minutes if help is not immediately available.