ST VINCENT DE PAUL CATHOLIC PRIMARY SCHOOL



Work at Height Policy

"We are called to be the hands and face of Jesus as we learn, love and grow together"

(HCC latest version: Updates November 2020 V2: substantial review to previous content Next HCC update November 2022)

Document Date: Summer 2023 Review Date: Summer 2024

Reviewed by the Health and Safety Committee

Ratified at Full Governing Body meeting

Chair of Governors Date ratified: 4th July 2023

Signature:

Page 1 of 11 March 2023

Introduction

- 1. **The Work at Height Regulations 2005** apply to all work situations from where a person could fall a distance liable to cause personal injury, or access to and from such a place, this includes work at ground level where there is a risk of falling into an excavation etc.
- 2. You are working at height if you:
 - · work above ground/floor level;
 - could fall from an edge, through an opening or fragile surface; or
 - could fall from ground level into an opening in a floor or a hole in the ground.

Work at height does **not** include slips / trips on the same level, nor does it include walking up and down a permanent staircase in a building.

3. Falls from height are still a major cause of injuries at work and often where the activity is of short duration and from 'low' heights of less than 2 meters.

Common causes of such accidents include:

- overreaching or over balancing;
- climbing with loads;
- using inappropriate access equipment such as desks / chairs;
- not securely fixing access equipment;
- using faulty access equipment;
- placing access equipment on unsuitable surfaces;
- falls from roofs with unprotected edges;
- falls through fragile materials i.e. skylights.
- 4. This guidance applies to all work situations from where a person could fall a distance liable to cause personal injury.
- 5. Reference to the safe use of ladders and stepladders is included in this guidance in recognition of the fact that after a risk assessment such equipment may be the only reasonably practical means of carrying out a task.

Responsibilities

- 6. Head teachers and those in control of any work at height activity must make sure the work is properly planned, supervised and carried out by competent people.
 - This includes using the right type of equipment for working at height and ensuring that suitable and sufficient risk assessments are in place.
 - Low-risk, relatively straightforward tasks will require less effort when it comes to planning.
- 7. Under H&S law all employees have general legal duties to take reasonable care of themselves and others who may be affected by their actions, and to co-operate with their employer to enable their health and safety duties and requirements to be complied with.

- 8. The School has agreed to nominate the Site Manager as the competent person responsible for all work at height activities on site. The Site Manager shall receive adequate training to complete the role and is named in the School's Health and Safety policy.
- 9. The nominated person shall ensure:
 - all work at height is properly planned and organised;
 - the use of access equipment is restricted to authorised users;
 - all those involved in work at height are given the relevant information / instruction / training and are competent and fit enough to undertake the task;
 - the risks from working at height are assessed and appropriate equipment selected;
 - a register of access equipment is maintained;
 - all access equipment is inspected and maintained;
 - the risks from fragile surfaces is properly controlled.
- 10. **Employees**, including volunteers, temporary staff etc. are responsible for
 - complying with any safety measures put in place by managers/supervisors to ensure any work at height is undertaken safely;
 - informing their employer of any medical condition (temporary or otherwise) which would prevent them from working at height;
 - only using access equipment which is appropriate to the task and for which they are trained;
 - inspecting equipment before use and reporting any defects identified.
- 11. In most cases school staff will do very little working at height and the majority of this will be at low level for light duties and relatively low risk.
 - However, you will need to consider whether there are any staff that are doing higher risk activities, such as caretakers or site managers accessing roofs, light building works, changing bulbs/florescent tubes at high level.

Risk Assessment for Work at height

- 12. Work at height should never be considered as being incidental to the actual activity being undertaken. Thus for all activities involving work at height a risk assessment **must** be conducted and the findings recorded.
 - This assessment should consider both the activity and the most appropriate access equipment to be used (not just what is available on site) to achieve a safe system of work.
- 13. There is a simple hierarchy of controls for work at height as follows:
 - a) avoid the risk by not working at height, if this is reasonably practicable.

 For example by working from existing platforms, using long reach equipment etc.

If it is not practicable to do the work safely in some other way then:

b) use work equipment or other measures to prevent falls; and

- c) where the risk of a fall cannot be eliminated further controls to minimise the distance and consequences of a fall should one occur.
- 14. A task specific work at height template is available to assist with the risk assessment process, along with some generic assessments these are not exhaustive and should be customised to suit the specific site and activity concerned. https://www.thegrid.org.uk/health-and-safety-offsite-visits-premises/health-and-safety/risk-assessments/generic-risk-assessments
- 15. As with all risk assessments these should be proportionate to the scale of the activities and level of risk involved, further advice is available from the Education Health and Safety Team if needed.
- 16. As a general guide the risk assessment should consider the following areas:

The task and activity involved

- How long will it take? (stepladders and ladders are only suitable for light tasks and short-term -less than 30 minutes duration)
- O What tools will be needed and will they increase the risks?
- o What manual handling will be involved will the user be stable enough?

The people (medical conditions etc.)

- o Are they adequately trained to use the equipment?
- Do they have any medical conditions that could affect their safety?
- o Are there any significant individual health issues i.e. epilepsy?
- o What is their general fitness are they comfortable to work at height?
- o Are they competent to work at height?

Equipment to be used including erection and dismantling

- o Is the equipment of the correct size/length (tall enough so no over-reaching is necessary but not so long or flexible that sway or vibration could occur)?
- Is the equipment of the correct design? (for ladders/stepladders, work within HCC should use EN 131 equipment – check the label. Class 3 'domestic' should be avoided unless risk assessment can justify that they are suitable for the task

• The location (proximity to roads, overhead electrical cables etc)

- Is the structure against which the access equipment will be used strong enough and in good repair?
- Is the surface which the access equipment will stand on or the area that will be accessed fragile or unstable?
- o Could pedestrian routes, overhead cables etc. be a hazard?
- o Can ladders be tied to the structure?

• The environment, poor conditions and slippery surfaces (weather, temperature etc.)

- Are surfaces slippery e.g. if the ground is muddy, could this be transferred to the equipment?
- o If outside, are weather conditions suitable (no high winds, heavy rain etc.)?
- Are light levels adequate?

• The effect on others

 Is there anyone on site who may be affected by the activity, such as pedestrians at risk from falling objects?

Emergency arrangements – including:

- Are any emergency plans needed, e.g. for rescuing or assisting people who are at height?
- 17. Once a risk assessment has been conducted it must be shared with all relevant person(s).
- 18. Where higher risk or specialist activities are contracted out then the contractor is responsible for ensuring a suitable risk assessment and method statement is undertaken. Those commissioning such work must satisfy themselves that the contractor selected has the appropriate competency and equipment to undertake the task safely.

Selecting Equipment

- 19. In selecting appropriate equipment for working at height priority should always be given to collective protective measures to prevent falls (e.g. guardrails and working platforms) before other personal measures. (e.g. fall arrest equipment)
- 20. Access equipment should be selected which is appropriate to the nature of the work being undertaken, taking account of such factors as:
 - working conditions;
 - duration and frequency of use;
 - complexity of work;
 - distance and consequences of a fall.
 - the risks to the safety of others where the work equipment will be used.
- 21. Ladders and stepladders should be used only for light duty, short duration work (max 30 mins) which has been approved by the Site Manager. For example whilst a ladder may reach the workplace, if the task requires strenuous work, carrying bulky / heavy equipment or likely to take > 30 mins then an alternative means of access such as a tower scaffold or podium steps would be more appropriate.

Use of work at height equipment

- 22. Schools should compile a register of such equipment (excluding kick stools), example ladder register.
 - Where there is more than one piece of equipment each should be indelibly marked with an identifying number.
- 23. Equipment for work at height, should be inspected prior to use (basic visual inspection) and by a competent person termly/6 monthly. The inspection will depend upon the complexity of the equipment. Checklist for ladder inspections
- 24. Where work equipment is hired to the user, it is important that both parties agree, in writing, exactly what inspection has been carried out and that this information is passed to those working at height.
- 25. In the case of tower scaffolds a competent person must inspect these prior to its first use and thereafter every 7 days that it remains in place.

Using Ladders (including stepladders)

- 26. Ladders should not be used simply because they are readily available, the risk assessment should determine if a ladder or stepladder is appropriate for the task.
- 27. Ladders and stepladders should only be used for short duration tasks (less than 30 minutes), light duty tasks or where more suitable access equipment cannot be used due to existing features of the site which cannot be altered.
- 28. Only those persons who have been trained to use ladders safely may use them.
- 29. All ladders should be secured against unauthorised use
- 30. Prior to use it should always be ensured that the ladder is in good condition and fit for purpose.
- 31. Where ladders are to be used to work from it should be ensured that:
 - a secure handhold and support are available at all times;
 - three points of contact maintained;
 - the work can be completed without stretching;
 - the ladder can be secured to prevent slipping.

The HSE have produced simple advice for users on the safe use of steps and ladders. LA 455 Safe use of ladders and stepladders – a brief guide

Work from roofs

- 32. Precautions must be in place to prevent falling from an edge, where permanent edge protection is not available then temporary guard rails or similar barriers are required.
- 33. Where roofs have to be regularly accessed for specific work activities / maintenance of plant, air handling units etc. then suitable protective measures should have been put into place at the design stage. Ensure that all contractors accessing such areas are aware of controls and have undertaken their own RAMS (risk assessment / method statement) for the works.
- 34. Considerations when accessing roofs

1. Can you eliminate the risk i.e., is access really needed?

For example, footballs could be replaced rather than retrieving 'ad hoc' from school roofs.

Where site staff or contractors are accessing the roof regularly for maintenance tasks (i.e., for fixed plant such as air handling units etc.) then edge protection (guardrails and handrails) should be installed.

Consider how often are staff going on the roof, is there one particular location where edge protection could be beneficial?

2. Edge Protection

This can be fixed or freestanding /folding, a weighted freestanding option does have advantages in that there's no need to penetrate the roof surface thus it won't compromise the integrity of the roof.

For more significant repair / maintenance tasks on the roof then temporary scaffolding could be used to provide edge protection or a short-term quardrail hire.

Scaffolding should only be erected and used by competent persons.

3. Fall arrest anchor systems

Where collective edge protection cannot be installed then vertical / horizontal safety lines for personal fall protection should be used e.g., a Man safe system or similar.

There are also mobile man anchors which can be used in locations where the fitting of a permanent system is not possible.

Any fall arrest or fall prevention systems used for Work at Height to be tested for integrity and compliance at least once every 12 months.

Training on fall arrest and the harness would be required for staff and there must be a **rescue plan** in place (These will be unique to each situation and that rescue could be affected by something as simple as providing a ladder for the individual to self-recover for example but obviously this depends on the roof height).

The key is to get the person down safely in the shortest possible time and before the emergency service response. If the rescue team cannot affect a rescue themselves emergency services are to be called at once.

Rescue plan to consider:

- What communication systems will be used between the suspended worker and rescue team? E.g., Direct voice communication, Mobile Phone, Two-way Radios etc.
- Members of rescue team / first aid provision Advice for first-aiders responding to harness suspension incidents - First aid at work (hse.gov.uk)
- Safety of rescuers / are there a sufficient number of rescuers available?
- How will rescuers get to casualty and is rescue equipment appropriate? E.g., ladder, via internal stairs / ladders, pull casualty in through window

4. Limit the amount of access

Combine tasks where possible, retrieve non-essential items such as footballs on a planned basis (e.g., termly, and subject to weather conditions), retrieve when accessing the roof for another maintenance tasks, gutter clearance etc.

5. Controlling risks where access can't reasonably be eliminated

- staff must have received working at height training, considered compulsory for HCC staff who
 access the school roof.
- ensure the integrity of the roof is inspected before work is carried out.
- keep away from any areas where water is pooling, these could be a weak point.
- be aware of any loose cables laying on the roof as well as overhead cables.
- no lone working when working at height. Activity must be carried out by two persons; one person to access the roof, one to foot the ladder.
- a suitable ladder to be used for access which **MUST** extend 1 M above the roof line. (This then acts as a handrail to access and egress the ladder onto and off the roof).

- secure the ladder via eye bolts to areas frequently used to access the school roof.
- activity carried out only when weather conditions are suitable, i.e., not in high winds, heavy rain, ice and snow on the surface, poor light, or darkness.
- consider how will tools etc be carried i.e., tool belt or bucket and rope system?
- once on the roof, care must be taken to avoid approaching the roof edge, staff to move 2
 metres away from the edge once on the roof. A push stick or similar item should be used to
 move or dislodge items close to the roof edge.
- if relevant Sky lights to be controlled via a visual barrier or a safe net system to be put in place. (There are products such as skylight fall prevention covers to prevent falls through fragile surfaces when working on roofs).

is there adequate communication in place in the event of an emergency i.e., mobile phone / walkie talkie.

35. See Appendix 1 for additional advice on access to low roofs.

Fragile surfaces

- 36. All fragile surfaces should be identified on site and suitable precautions be in place to prevent inadvertent access during access / works to such areas. i.e. barriers around sky lights or safety net systems (see https://www.skylightsafetynet.co.uk/ as an example)
- 37. Warning signs should be fixed at the approach to fragile roofs where access is needed or foreseeable.
 - Work should be arranged as far as possible to avoid working on or passing near fragile surfaces.

Information, instruction and training

- 38. All employees required to work at height must be competent to do so and receive relevant information and instruction in the risks of working at height and specific training in the equipment that they will be using. The level of training required should be proportionate to the risk.
- 39. This does not necessarily mean they need to go on a training course. In many cases, simply ensuring staff are aware of the risk assessment and the safety advice within it might be sufficient, particularly for low risk activities using kick stools and small stepladders.
- 40. The HSE have produced simple practical advice for users on the safe use of steps and ladders (INDG45) (see Appendix 2) for staff involved in low risk activities (accessing storage, putting up displays at low height etc. Managers should talk through the expectations of the school policy and this guidance with staff and ensure that this is understood.
- 41. Providing the HSE guidance to staff and ensuring they are aware of the simple precautions to take when using ladders and stepladders would constitute a proportionate level of instruction for low risk activities.
- 42. A formal training course on working at height would be advisable for higher risk work such as:
 - accessing unguarded flat roofs;
 - working on unguarded flat/fragile roofs;
 - cleaning out gutters;
 - cleaning windows which cannot be reached from ground level;

- Changing bulbs/florescent tubes at high level e.g. >3m;
- 43. Training in the safe use, selection and inspection of ladders are provided by the Education Health and Safety Team. Contact healthandsafety@hertfordshire.gov.uk for information.
- 44. Members of staff who erect or use other access equipment (mobile tower scaffold, mobile elevated working platform (MEWPs) such as scissor lifts etc.) **must** have received specific training in the use of that equipment.
- 45. A PASMA (Prefabricated Access Suppliers' and Manufacturers' Association) qualification is recognised in the construction industry for those operatives working at height on mobile access towers. The **training courses** are approved by HSE and the UK Contractors Group.
- 46. School staff assembling / dismantling mobile towers should be PASMA trained, this proves that users have undertaken training to an accredited standard and combined with experience and technical knowledge demonstrates competency. See https://pasma.co.uk/about/ & find a training centre nearby via https://pasma.co.uk/directory/find-training-centre/

Further information and guidance

Health and safety guidance and support Education Health and Safety Team - 01992 556478 healthandsafety@hertfordshire.gov.uk

APPENDIX 1 LOW ROOF UNAUTHORISED ACCESS

In addition to the work at height regulations, occupiers liability legislation requires the occupier of premises to ensure that it's safe for visitors both lawful and unlawful.

Low level, flat roofed buildings present a particular risk as people are able to easily gain access to a height where they are then at risk of falling off the roof edge or through fragile roof materials.

LOW ROOFS - A DEFINITION

A low roof should be considered to be one which may be climbed onto by an individual without assistance from another person. This includes both low roof heights relative to ground level and those with an available foothold for climbing such as:

- low level structural features, porches, window ledges, drainpipes etc;
- fences, walls and railings adjacent / close to the building;
- · trees or shrubs near the building;
- moveable objects (wheelie bins etc) nearby;
- items which may at times be located close to the building (e.g. parked vehicles).

RISK ASSESSMENT

The generic low roof risk assessment can be used to assist establishments identify the risks associated with access to low, flat roofed structures.

In identifying the hazards the following should be considered:

- are there locations providing easy access to roofs (examples are given in 2.1) particular consideration should be given to features located in more remote and thus less well supervised areas.
- is there any history or evidence that climbing has occurred at these locations e.g. worn areas on walls and fences, damage to trees, rubbish / graffiti on roof locations.
- are there any allurements, which may attract children to climb onto the roof e.g. access to a restricted courtyard or onto a higher level roof.
- are all fragile surfaces (glazing, roof lights, roofing) on site clearly identified, those where there is a risk of a person falling through must be assessed.

Control measures will generally fall into the following categories

Physical controls such as:

- the removal of climbing aids:
- use of anti-climb paint (only to be used above 2M high and with warning signs) on guttering, roof edging etc. identified as a potential climbing area;
- anti-climb fans around the top of drainpipes or locations identified as having easy access due to adjacent structures.
- Prikka strips- strip fence spikes.
- Bins located away from the school building.

Management controls such as:

- areas for ball games located away from flat roofs;
- arrangements for safe retrieval of items from roof;
- supervision of potential climbing locations during lunchtime, breaks etc;
- an awareness of the need to minimise the potential for access to roofs offered by new structures / modifications e.g. installing walls, fences etc.

APPENDIX 2 SAFE USE OF STEPLADDERS

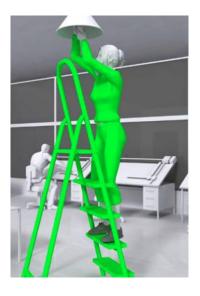
'Contains public sector information published by the Health and Safety Executive and licensed under the Open Government Licence'.

When using a stepladder to carry out a task:

- Check all four stepladder feet are in contact with the ground and the steps are level
- Only carry light materials and tools
- Don't overreach
- 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
- Ensure any locking devices are engaged
- Try to position the stepladder to face the work activity and not side on. However, there are occasions when a risk assessment may show it is safer to work side on, e.g., in a retail stock room when you can't engage the stepladder locks to work face on because of space restraints in narrow aisles, but you can fully lock it to work side on
- Try to avoid work that imposes a side loading, such as side-on drilling through solid materials (e.g., bricks or concrete)
- Where side loadings cannot be avoided, you should prevent the steps from tipping over,
 e.g., by tying the steps. Otherwise, use a more suitable type of access equipment
- Maintain three points of contact at the working position. This means two feet and one hand, or when both hands need to be free for a brief period, two feet and the body supported by the stepladder.

When deciding whether it is safe to carry out a particular task on a stepladder where you cannot maintain a handhold (e.g., to put a box on a shelf, hang wallpaper, or install a smoke detector on a ceiling), the decision needs to be justified, considering:

- the height of the task
- whether a handhold is still available to steady yourself before and after the task
- whether it is light work
- whether it avoids side loading
- whether it avoids overreaching
- whether the stepladder can be tied (e.g., when side-on working)



Example where two hands need to be free for a brief period for light work. Keep two feet on the same step and the body (knees or chest) supported by the stepladder to maintain three points of contact. Make sure a safe handhold is available