



## PWYLLGOR IECHYD A DIOGELWCH HEALTH & SAFETY COMMITTEE

<b>DYDDIAD Y CYFARFOD: DATE OF MEETING:</b>	13 November 2023
<b>TEITL YR ADRODDIAD: TITLE OF REPORT:</b>	New Policy (1198) – Safe Working at Height Policy
<b>CYFARWYDDWR ARWEINIOL: LEAD DIRECTOR:</b>	Mandy Rayani, Director of Nursing, Quality and Patient Experience
<b>SWYDDOG ADRODD: REPORTING OFFICER:</b>	Tim Harrison, Head of Health, Safety and Security Adam Springthorpe, Health & Safety Manager

**Pwrpas yr Adroddiad (dewiswch fel yn addas)**

**Purpose of the Report (select as appropriate)**

Ar Gyfer Penderfyniad/For Decision

### ADRODDIAD SCAA SBAR REPORT

#### Sefyllfa / Situation

The Health and Safety Committee (HSC) is requested to approve the new 1198 – Safe Working at Height Policy. This report provides the required assurance that this written control document has been developed in line with all relevant legislation / regulations and available evidence and can therefore be implemented within Hywel Dda University Health Board (HDdUHB).

#### Cefndir / Background

The Work at Height Regulations 2005 provide a legal framework to protect people who work at height. The regulations require HDdUHB to protect employees who work at height, those who could be affected by work being undertaken at height and others who may be contracted to work at height on Health Board premises. 'Work at height' means work in any location where, if there were no precautions in place, a person could fall a distance liable to cause personal injury.

HDdUHB will avoid work at height where it is reasonably practicable to do so. Where work at height cannot be avoided, all activities will be properly planned and organised, forming part of a risk assessment and a safe system of work process.

HDdUHB recognises the risks posed to staff when working at height and will manage, as far as is reasonably practicable, all work at height that falls under its control. This policy demonstrates HDdUHB's commitment to reducing the risks associated with work at height and the continued improvement of employee health, safety and welfare.

#### Asesiad / Assessment

This new Policy has been developed with key stakeholders including Health and Safety, Manual Handling, Operational Compliance and Site Operations (Estates) and has been overseen by a Working Group.

The Policy was circulated to the full membership of the Health and Safety Advisory Group (HSAG) for comment over a period two weeks. The Group comprises of representation from the Health, Safety and Security Team, the Legal Team, Occupational Health, Operational Compliance and Manual Handling. All comments received were actioned appropriately.

The Policy was then sent for global consultation for the period 20/09/2023 – 04/10/2023. No further comments were received. The Health and Safety Advisory Group locally approved the Policy on 11/10/2023, ahead of the Health and Safety Committee.

The Policy will be available in all areas via the HDdUHB Policy Internet site.

For the Safe Working at Height Policy to be successful, all managers will need to ensure that all users of work at height equipment within their areas of responsibility read, understand and comply with the requirements of the Policy.

The Health, Safety and Security Department will monitor and review this Policy on a three-yearly basis (or sooner if there are any changes in legislation or practice). This will provide a measurement of performance and ensure adequate processes and structures are in place, as well as continuing compliance with statutory responsibilities.

#### Argymhelliad / Recommendation

The Health and Safety Committee is asked to:

- **APPROVE** the Safe Working at Height Policy.

#### **Amcanion: (rhaid cwblhau)**

#### **Objectives: (must be completed)**

Committee ToR Reference: Cyfeirnod Cylch Gorchwyl y Pwyllgor:	3.16 Approve organisational Health and Safety Policies, Procedures, Guidelines and Codes of Practice (policies within the scope of the Committee).
Cyfeirnod Cofrestr Risg Datix a Sgôr Cyfredol: Datix Risk Register Reference and Score:	N/A
Galluogwyr Ansawdd: Enablers of Quality: <a href="#">Quality and Engagement Act (sharepoint.com)</a>	1. Leadership 3. Data to knowledge 4. Learning, improvement and research
Parthau Ansawdd: Domains of Quality <a href="#">Quality and Engagement Act (sharepoint.com)</a>	2.1 Managing Risk and Promoting Health and Safety 7.1 Workforce
Amcanion Strategol y BIP: UHB Strategic Objectives:	1. Putting people at the heart of everything we do 4. The best health and wellbeing for our individuals, families and communities

Amcanion Cynllunio Planning Objectives	2a Staff health and wellbeing 5a Estates Strategies
Amcanion Llesiant BIP: UHB Well-being Objectives: <a href="#">Hyperlink to HDdUHB Well-being Objectives Annual Report 2021-2022</a>	2. Develop a skilled and flexible workforce to meet the changing needs of the modern NHS

<b>Gwybodaeth Ychwanegol: Further Information:</b>	
Ar sail tystiolaeth: Evidence Base:	<ul style="list-style-type: none"> <li>• INDG401 'Working at height: A brief guide'. Health and Safety Executive (HSE).</li> <li>• LA455 'Safe Use of Ladders and Stepladders – a brief guide'. Ladder Association and HSE.</li> <li>• HSG33 'Health and safety in roof work'. HSE.</li> <li>• GEIS5 'Fragile roofs. Safe working practices'. HSE</li> <li>• BS EN 131 Ladders. Terms, types, functional sizes. British Standards Institution.</li> <li>• Work at Height Policy and Procedure, NHS Lothian.</li> <li>• Work at Height Policy, Doncaster and Bassetlaw Teaching Hospitals NHS Foundation Trust.</li> <li>• Health and Safety Executive (HSE) Work at height website.</li> </ul>
Rhestr Termiau: Glossary of Terms:	As contained within the body of the report.
Partïon / Pwyllgorau â ymgynhorwyd ymlaen llaw y Pwyllgor Ansawdd Iechyd a Diogelwch: Parties / Committees consulted prior to Health and Safety Committee:	Key Stakeholder Consultation Work at Height Working Group Health & Safety Advisory Group

<b>Effaith: (rhaid cwblhau) Impact: (must be completed)</b>	
<b>Ariannol / Gwerth am Arian: Financial / Service:</b>	There are no direct costs associated with the Policy other than continued (rather than new) training requirements.
<b>Ansawdd / Gofal Claf: Quality / Patient Care:</b>	There is a positive impact on staff safety, health and wellbeing through compliance with this Policy.
<b>Gweithlu: Workforce:</b>	There will be no adverse impact upon staff.
<b>Risg: Risk:</b>	Not applicable.
<b>Cyfreithiol: Legal:</b>	A breach of health and safety regulations can result in the issue of prohibition or improvement notices or criminal proceedings.

<b>Enw Da: Reputational:</b>	Prosecutions and claims due to breaches in legislation or personal injury claims can lead to negative publicity.
<b>Gyfrinachedd: Privacy:</b>	Not applicable.
<b>Cydraddoldeb: Equality:</b>	No evidence gathered at this stage to indicate a negative impact on any protected group(s).

## Equality Impact Assessment (EqIA) Screening Template

The Equality Impact Assessment Screening Template is a short exercise that involves looking at the overall proposal and deciding if it is relevant to the Public Sector Equality Duty, and other key areas.

The questions in the Screening Template below will help you to decide if the proposal is relevant to the Equality Act 2010 and whether a detailed EqIA is required. The key question is whether the proposal is likely to have an impact (either positive or negative) on any of the protected characteristics.

Quite often, the answer may not be obvious, and staff, service-user or provider information will need to be considered to make a preliminary judgment.

There is no one size fits all approach, but the screening process is designed to help fully consider the circumstances and to inform evidence-based decisions.

**Note: If the proposal is of a significant nature and it is apparent from the outset that a full Equality Impact Assessment (EqIA) will be required, then it is not necessary to complete the Screening Template and you can proceed to complete the full EqIA.**

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### What to do:

In general, the following questions all feed into whether an EqIA is required:

- How many people is the proposal likely to affect?
- How significant is its impact?
- Does it relate to an area where there are known inequalities?

At this initial screening stage, the point is to try to assess obvious negative or positive impacts.

You will need to provide sufficient information within the template to justify the assessment of impact.

If a negative/adverse impact has been identified (actual or potential) during completion of the screening tool, a full EqIA must be undertaken.

If no negative / adverse impacts arise from the proposal, it is not necessary to undertake a full EqIA however, the decision and justification must be clearly recorded.

### On completion of the Screening Template, staff should:

- Check that all sections of the template are fully completed.
- Ensure that the Project/Policy owner has signed off the Screening Template
- Send a copy of the completed template along with the related policy to the Diversity & Inclusion Team for them to review – email this to [Inclusion.hdd@wales.nhs.uk](mailto:Inclusion.hdd@wales.nhs.uk)

<b>Date of commencement of Screening Assessment:</b>	<b>19/09/2023</b>
<b>Screening conducted by (name and email address):</b>	<b>Adam Springthorpe</b>
<b>Title of programme, policy or project being screened:</b>	<b>(No. TBC) – Safe Work at Height Policy</b>

**Description of the programme/policy/project being screened (including key aims and objectives)**

This policy aims to protect employees and others, as far as is reasonably practicable, from the risks posed to staff when working at height. Hywel Dda University Health Board (HDdUHB) will aim to achieve this by putting measures in place to control the risks associated with work at height as far as is reasonably practicable. When selecting controls to manage this risk, HDdUHB will apply the hierarchy of controls as set out in the Management of Health & Safety at Work Regulations 1999 and the Work at Height Regulations 2005. The aim of this document will be achieved through the following three basic objectives, based on the hierarchy of controls:

- HDdUHB will, as far as is reasonably practicable, **avoid** work at height;
- Where work at height cannot be easily avoided, HDdUHB will **prevent** falls using either an existing place of work that is already safe or the right type of equipment;
- Where the risk cannot be eliminated, HDdUHB will **minimise** the distance and consequences of a fall by using the right type of equipment.

Additionally:

- Where work at height cannot be avoided, all activities will be properly planned and organised, forming part of a risk assessment and safe system of work process;
- HDdUHB will provide employees with suitable information, instruction and training;
- HDdUHB will ensure that equipment is suitable, stable and strong enough for the job, suitably maintained and checked regularly, including periodic inspections by a competent person.

**Evidence considered (including staff and population data, relevant research, expert and community knowledge etc.)**

- The Policy has been written in conjunction with the Operations Compliance Team in the Estates Department – the department containing the main high-risk staff to which the policy is most relevant.
- Reviewer is Policy author and subject matter expert.
- Knowledge of the work undertaken by those affected by the Policy.
- Knowledge of the staff groups affected by the requirements of this Policy.

**Assess which protected characteristics will potentially be affected by the proposal:**

<b>Group</b>	<b>Positive Impact</b>	<b>Negative Impact</b>	<b>No Impact</b>
<b>Age</b> Is it likely to affect older and younger people in different ways or affect one age group and not another?	It is more likely to have a positive impact in that it protects the health and safety of staff in the workplace.		
<b>Disability</b> Those with a physical disability, learning disability, sensory loss or impairment, mental health conditions, long-term medical conditions such as diabetes	It is more likely to have a positive impact in that it protects the health and safety of staff in the workplace.		
<b>Gender Reassignment</b> Consider the potential impact on individuals who either: <ul style="list-style-type: none"> <li>• Have undergone, intend to undergo or are currently undergoing gender reassignment.</li> <li>• Do not intend to undergo medical treatment but wish to live in a different gender from their gender at birth</li> </ul>			No impact
<b>Marriage / Civil Partnership</b> This also covers those who are not married or in a civil partnership.			No impact
<b>Pregnancy and Maternity</b> Maternity covers the period of 26 weeks after having a baby, whether or not they are on Maternity Leave	It is more likely to have a positive impact in that it protects the health and safety		

	of staff in the workplace.		
<b>Race / Ethnicity</b> People of a different race, nationality, colour, culture or ethnic origin including non-English / Welsh speakers, gypsies/travellers, asylum seekers and migrant workers.			No impact
<b>Religion or Belief</b> The term 'religion' includes a religious or philosophical belief.			No impact
<b>Sex</b> Consider whether those affected are mostly male or female and where it applies to both equally does it affect one differently to the other?			No impact
<b>Sexual Orientation</b> Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.			No impact



**Consider the potential impacts of the programme/policy/project on the following wider determinants:**

Additional Determinants	Positive Impact	Negative Impact	No Impact
<p><b>Armed Forces Community</b>  Consider members of the Armed Forces and their families, whose health needs may be impacted long after they have left the Armed Forces and returned to civilian life. Also consider their unique experiences when accessing and using day-to-day public and private services compared to the general population. It could be through ‘unfamiliarity with civilian life, or frequent moves around the country and the subsequent difficulties in maintaining support networks, for example, members of the Armed Forces can find accessing such goods and services challenging.’</p> <p>For a comprehensive guide to the Armed Forces Covenant Duty and supporting resource please see:  <a href="#">Armed-Forces-Covenant-duty-statutory-guidance</a></p>	<p>It is more likely to have a positive impact in that it protects the health and safety of staff in the workplace.</p>		
<p><b>Socio Economic Duty</b>  Consider those on low income, economically inactive, unemployed or unable to work due to ill-health. Also consider people living in areas known to exhibit poor economic and/or health indicators and individuals who are unable to access services and facilities. Food / fuel poverty and personal or household debt should also be considered.</p> <p>For a comprehensive guide to the Socio-Economic Duty in Wales and supporting resource please see:  <a href="#">more-equal-wales-socio-economic-duty</a></p>			<p>No impact</p>
<p><b>Welsh Language</b>  Please note opportunities for persons to use the Welsh language and treating the Welsh language no less favourably than the English language.</p>			<p>No impact</p>

**Summary of Potential Impacts Identified**

**Positive Impacts**

The Policy is more likely to have a positive impact in that it protects the health and safety of staff in the workplace.

**Negative Impacts**

There was no evidence to indicate that the policy would have an adverse effect on any group or individual with any one or multiple protected characteristics that could not be mitigated.

<b>Has the screening identified any negative impacts?</b>		No
<b>If yes, a full Equality Impact Assessment will need to be undertaken.</b>		

**If No negative impacts were identified, please give full justification here**

No negative impacts identified.

A search of similar policies elsewhere indicated similar results:-  
[bing.com/ck/a?!&&p=cb00f48a6aa37f71JmltdHM9MTY5NTA4MTYwMCZpZ3VpZD0xNGFIZTlwZi0yNDA2LTZiYTMtMDQyMy1mMmQ4MjVjNjZhOTlmaW5zaWQ9NTlwMQ&ptn=3&hsh=3&fclid=14ae20f-2406-6ba3-0423-f2d825c66a92&psq=Equality+Impact+assessment+nhs+work+at+height+policy&u=a1aHR0cHM6Ly93d3cuZGJ0aC5uaHMudWsvZG9jdW1lbnQvY29ycGhzZnMzMm0yLw&ntb=1](https://www.bing.com/ck/a?!&&p=cb00f48a6aa37f71JmltdHM9MTY5NTA4MTYwMCZpZ3VpZD0xNGFIZTlwZi0yNDA2LTZiYTMtMDQyMy1mMmQ4MjVjNjZhOTlmaW5zaWQ9NTlwMQ&ptn=3&hsh=3&fclid=14ae20f-2406-6ba3-0423-f2d825c66a92&psq=Equality+Impact+assessment+nhs+work+at+height+policy&u=a1aHR0cHM6Ly93d3cuZGJ0aC5uaHMudWsvZG9jdW1lbnQvY29ycGhzZnMzMm0yLw&ntb=1)

The needs of individuals in relation to their protected characteristics need to be taken into account when providing associated training e.g. assistance with accessibility, language, learning and literacy skills.

It will be the responsibility of managers to ensure that the policy is applied fairly and equitably on an individual basis and that staff with any single or multiple protected characteristics will be afforded the same opportunities and protections as those who do not share any protected characteristics.

Screening Completed by:	Name	Adam Springthorpe
	Title	Health & Safety Manager
	Contact details	adam.springthorpe@wales.nhs.uk
	Date	19/09/2023
Screening Authorised by: (Project / Policy Owner)	Name	Adam Springthorpe
	Title	Health & Safety Manager
	Contact details	adam.springthorpe@wales.nhs.uk
	Date	19/09/2023
Seen by Diversity & Inclusion Team:	Name	Alan Winter
	Title	Senior Diversity & Inclusion Officer
	Contact details	<a href="mailto:Alan.winter@wales.nhs.uk">Alan.winter@wales.nhs.uk</a>
	Date	4/10/2023

# Safe Working at Height Policy

## Policy information

**Policy number:**  
1198

**Classification:**  
Corporate

**Supersedes:**  
N/A

**Local Safety Standard for Invasive Procedures (LOCSSIP) reference:**  
N/A

**National Safety Standards for Invasive Procedures (NatSSIPs) standards:**  
N/A

**Version number:**  
V1

**Date of Equality Impact Assessment:**  
19/09/2023

## Approval information

**Approved by:**  
Health and Safety Committee

**Date of approval:**  
*Enter approval date*

**Date made active:**  
*Enter date made active (completion by policy team)*

**Review date:**  
*Enter review date (normally three years from approval date)*

**Summary of document:**

This document provides guidance on the arrangements for managing work at height as part of the Health Board's responsibility to staff under Health & Safety Legislation.

**Scope:**

This policy is applicable to all Hywel Dda University Health Board (HDdUHB) staff, including Independent Members, volunteers, those seconded into the Organisation or holding honorary contracts, locums and students.

**To be read in conjunction with:**

[010 – Health and Safety Policy](#) - opens in a new tab

[273 – Manual Handling Policy](#) – opens in a new tab

[393 – Confined Space and Restricted Access Space Policy](#) – opens in a new tab

[541 – Contractor Control Policy](#) – opens in a new tab

[608 – Risk Management Framework](#) – opens in a new tab

[649 – Workplace Slips, Trips and Falls Policy](#) – opens in a new tab

[674 – Risk Assessment Procedure](#) – opens in a new tab

[982 – Incident, Near Miss and Hazard Reporting Procedure](#) – opens in a new tab

**Patient information:**

Include links to [Patient Information Library](#)

**Owning group:**

Health & Safety Advisory Group / Health and Safety Committee

11/10/2023

**Executive Director job title:**

Mandy Rayani, Director of Nursing, Quality and Patient Experience

**Reviews and updates:**

N/A

**Keywords**

Work at height, Ladders, Step ladders, Steps, Stools, Kick-stools, Working platforms, Scaffolding

**Glossary of terms**

WaH – Work at Height

SSoW – Safe System of Work

HSE – Health and Safety Executive

MEWP – Mobile Elevated Working Platform

PPE – Personal Protective Equipment

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## Introduction

The Hywel Dda University Health Board (HDdUHB) has statutory obligations under the Health and Safety at Work Act (HSWA) to ensure the health, safety and welfare of all employees and anyone affected by their work, as far as is reasonably practicable. This includes taking steps to control the risks presented by work at height.

The Work at Height Regulations 2005 provide a legal framework to protect people who work at height. The regulations require HDdUHB to protect employees that work at height, those that could be affected by work being undertaken at height and others who may be contracted to work at height on Health Board premises. '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.

HDdUHB will avoid work at height where it is reasonably practicable to do so. Where work at height cannot be avoided, all activities will be properly planned and organised, forming part of a risk assessment and safe system of work process.

## Policy statement

HDdUHB recognises the risks posed to staff when working at height and will manage, as far as is reasonably practicable, all work at height that falls under its control. This policy demonstrates HDdUHB's commitment to reducing the risks associated with work at height and the continued improvement of employee health, safety and welfare. Work at height can include, but is not exclusively limited to:

- working from a ladder / stepladder / mobile ladder / fixed ladder / stool / platform step;
- working on roofs;
- working on or around fragile surfaces;
- working from scaffolding;
- working from a motorised platform (including vehicle tail lifts);
- working on top of a vehicle, such as a tanker or flat bed lorry;
- working at ground level adjacent to an excavation;
- working below ground level (this may involve vertical access to below ground spaces and therefore still be classified as work at height. This also would cover descending into pits, tanks, bunding, or other confined spaces).

## Scope

This policy is applicable to all HDdUHB staff, including Independent Members, volunteers, those seconded into the Organisation or holding honorary contracts, locums and students. This policy relates to all staff whose work requires them to work at height in the workplace. Work at height activities undertaken can include the following:

- Estates – Maintenance: Use of step ladders and leaning ladders, Mobile Elevated Working Platforms (MEWPs), mobile scaffolds, fixed scaffolds, line access systems, access to confined spaces and vertical access to fixed structures such as chimneys, water tanks etc;
- Facilities – Cleaning/curtain replacement: Use of step ladders/step stools;
- IT – Use of ladders for cable access in ceiling and other voids;
- Health Records / Administration / Clinical areas – Use of step ladders / step stool to access patient records, files, linen, stores and equipment as required.

Please note, this list is not exhaustive.

## Aim

This policy aims to protect employees and others, as far as is reasonably practicable, from the risks posed to staff when working at height. HDdUHB will aim to achieve this by putting measures in place to control the risks associated with work at height as far as is reasonably practicable. When selecting controls to manage this risk, HDdUHB will apply the hierarchy of controls as set out in the Management of Health & Safety at Work Regulations 1999 and the Work at Height Regulations 2005.

<b>Reg 6 (2)</b>	<b>Avoid work at height</b>
<b>Reg 6 (4(b))</b>	<b>Prevent falls from height by using an existing workplace</b>
<b>Reg 6 (4(b))</b>	<b>Prevent falls from height using collective equipment</b>
<b>Reg 7 (a)</b>	<b>Prevent falls from height using PPE</b>
<b>Reg 6 (5)(a)(i)</b>	<b>Minimise distance of a fall from height using collective equipment</b>
<b>Reg 7 (a)</b>	<b>Minimise distance of a fall from height using PPE</b>
<b>Reg 6 (5)(a)(ii)</b>	<b>Minimise consequences of a fall from height using collective equipment</b>
<b>Reg 6 (5)(b)</b>	<b>Minimise consequences of a fall through training and instruction</b>

A visual representation of the hierarchy of controls for work at height and the relevant regulation.

## Objectives

The aim of this document will be achieved through the following three basic objectives, based on the hierarchy of controls outlined above:



- HDdUHB will, as far as is reasonably practicable, **avoid** work at height;
- Where work at height cannot be easily avoided, HDdUHB will **prevent** falls using either an existing place of work that is already safe or the right type of equipment;
- Where the risk cannot be eliminated, HDdUHB will **minimise** the distance and consequences of a fall by using the right type of equipment.

Additionally:

- Where work at height cannot be avoided, all activities will be properly planned and organised, forming part of a risk assessment and safe system of work process;
- HDdUHB will provide employees with suitable information, instruction and training;
- HDdUHB will ensure that equipment is suitable, stable and strong enough for the job, suitably maintained and checked regularly, including periodic inspections by a competent person.

## Responsibilities

### Chief Executive

The Chief Executive is responsible to the Board of HDdUHB for the implementation of the arrangements and procedures required to implement this policy and to achieve compliance with legislation in standards of health and safety. These are outlined in more detail within HDdUHB 010 – [Health and Safety Policy](#).

### Executive Directors

Executive Directors are responsible to the Board and for ensuring that all risks associated with any work at height are adequately controlled within their areas of responsibility. Executive Directors are also responsible for ensuring suitable and sufficient risk assessments are undertaken as required and suitable control measures are implemented to control the risk from work at height.

### Senior Managers

All Senior Managers including Assistant Directors, Heads of Departments etc are responsible for leading on the implementation of this policy 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.

### Estates and Facilities Directorate Management Team and Operations Compliance Team

The Estates and Facilities Directorate management team and Operations Compliance team (including Estates Officers and Supervisors, Facilities Managers, Supervisors & Co-ordinators etc) are responsible for:

- identifying employees within the Estates and Facilities Directorate who undertake work at height;
- ensuring that all employees undertaking high-risk and/or long duration work at height activities receive suitable and sufficient information, instruction and training on the management of work at height, commensurate to the level of risk and specialist equipment required;
- ensuring that all employees undertaking low-risk, short duration work at height receive suitable and sufficient information, instruction and training on the management of work at height via a locally delivered team brief (using the template in Appendix 1);
- ensuring that when planning work at height:
  - every effort is made to avoid work at height;
  - where work at height cannot be avoided, managers must make sure work is properly planned, supervised and carried out by competent people;
  - a risk assessment is undertaken before work commences. Should the risk assessment process identify that a significant risk exists then a safe system of work should be developed and then implemented;
  - all staff who work at height are physically fit to do so;
  - the place where work at height is undertaken (including the means of access) is safe and has control measures in place to prevent a fall (taking into account the demands of the task, equipment and working environment);
  - suitable and sufficient work at height equipment or other measures to prevent falls are provided where work at height cannot be avoided.
- ensuring that all work at height is undertaken using equipment which is suitable, stable and strong enough for the job, suitably maintained and checked prior to each use;
- ensuring that all work at height equipment is uniquely identifiable, subject to a periodic service and/or inspection by a competent person and that an inventory of work at height equipment is kept and recorded. The inspection frequency will be determined by the use and location of the equipment;
- ensuring that all Personal Protective Equipment (PPE) provided for use by staff undertaking work at height is fit for purpose;
- ensuring that all **contractors (and subcontractors)** employed to undertake work at height on Health Board premises are competent to work at height and are managed and monitored in accordance with the Contractor Control Policy;
- ensuring the reasonable prevention of unauthorised access to height.

### **Line Managers / Supervisors (Except Estates and Facilities Directorate)**

Line Managers / Supervisors (Except Estates and Facilities Directorate – See previous) are responsible for:

- identifying employees within their area(s) of responsibility who undertake work at height;
- ensuring that all employees undertaking low-risk, short duration work at height receive suitable and sufficient information, instruction and training on the management of work at height via a locally delivered team brief (see Appendix 1). This may be facilitated through cascade training;
- ensuring that every effort is made to avoid work at height;
- ensuring that all work at height is undertaken using equipment which is suitable, stable and strong enough for the job, suitably maintained and checked prior to each use;
- reporting concerns to the Engaging Manager and/or Estates if they see contractors or staff members using stepladders or any other work at height equipment inappropriately;
- ensuring that all work at height equipment is uniquely identifiable and subject to a periodic inspection by a competent person from the Health, Safety and Security Department. The inspection frequency will be determined by the use and location of the equipment.

**Note: If any staff outside of the Estates and Facilities Directorate are identified as needing to undertake work at height which is high-risk and/or long duration, it must be ensured that those staff receive suitable and sufficient additional work at height training.**

### **Health, Safety and Security Department**

Reporting to the Director of Nursing, Quality and Patient Experience, the Health, Safety and Security Department will be responsible through HDdUHB's Health and Safety management system for:

- ensuring that all line managers / supervisors understand that they need to deliver the team brief in Appendix 1 to all staff that undertake low-risk, short duration work at height. This may be facilitated through cascade training;
- ensuring that all work at height equipment outside of the Estates and Facilities Directorate is uniquely identifiable and subject to a periodic inspection by a competent person. The inspection frequency will be determined by the use and location of the equipment;
- providing advice and guidance on the selection of suitable work at height equipment for departments outside of the Estates and Facilities Directorate, in conjunction with Procurement;
- reporting to Health and Safety Committee any reported issues relating to work at height and the actions taken to prevent recurrence;

- developing the HDdUHB Safe Working at Height Policy and advising on local implementation;
- monitoring and reviewing Policy effectiveness in conjunction with the Operations Compliance Team in the Estates Department;
- communicating changes in legislation and best practice.

### **Manual Handling Team**

Reporting to the Health, Safety and Security Department, the Manual Handling Team will be responsible for:

- delivering training on handling tasks undertaken at height, including guidance on risk assessment using the TILE method (Task, Individual capacity, Load, Environment), as part of the corporate induction process;
- providing advice and guidance on handling tasks undertaken at height.

### **Employees**

In addition to their duties under the Health and Safety at Work etc. Act 1974, Management of Health and Safety at Work Regulations 1999 and subsequent legislation and guidance, employees will assist their managers by:

- complying with requirements of this policy, local procedures and risk assessed control measures, including any safe systems of work identified for working at height;
- immediately informing their line manager if they suspect that the safe system of work in place is ineffective or inadequate;
- ensuring that any information, instruction and training for working at height is adhered to;
- wearing the appropriate PPE as identified by the risk assessment;
- using any equipment provided for work at height for its intended purpose;
- inspecting ladders prior to each use, paying particular attention to the condition of the rungs, stiles, connectors, treads, crossbar, welds, screws, hinges and built-in stability devices;
- reporting to their line manager any fault or defect with any work at height equipment and immediately removing from use;

- reporting to their line manager if they see contractors or staff members using stepladders or any other work at height equipment inappropriately;
- informing their line manager of any limitations they may have which may prevent them working at height.

## Risk Assessment

As stated in the objectives, every reasonably practicable effort should be made to **avoid** work at height. Where work at height cannot be easily avoided, HDdUHB will **prevent** falls using either an existing place of work that is already safe or the right type of equipment. Where the risk cannot be eliminated, HDdUHB will **minimise** the distance and consequences of a fall by using the right type of equipment. The HSE's simple step-by-step guide ([Working at height: A brief guide \(hse.gov.uk\)](https://www.hse.gov.uk/working-at-height/) – opens in new tab) helps consider the risks associated with work at height and provides guidance on putting in place sensible and proportionate measures to manage the risks of working at height.

In the event that work at height cannot be avoided, a suitable and sufficient risk assessment must be undertaken. The outcomes of the risk assessment will provide the evidence for the development of a safe system of work, which includes the provision of emergency procedures. The risks presented by work at height are usually well known and most necessary control measures are easy to apply. All foreseeable risks must be considered in advance. When assessing risk, all available information about the work to be undertaken needs to be available and consulted.

Firstly, **ensure that every effort is made to avoid work at height**. Is there an alternative work method? Can the work be undertaken from the floor with a tool with a long handle for example? Where work at height cannot be easily avoided, the risk assessment required will depend on the level of risk.

Where only low-risk, short duration tasks are to be performed:

- ensure that all staff undertaking the work have received suitable and sufficient information, instruction and training on the management of work at height via a locally delivered team brief (see Appendix 1);
- minimise the distance and consequences of a fall by using a properly set up stepladder, working platform or step stool within its limitations. Ensure that all work at height is undertaken using equipment which is suitable, stable and strong enough for the job, suitably maintained and checked prior to each use;
- ensure that all work at height equipment is uniquely identifiable and subject to a periodic inspection by a competent person. The inspection frequency will be determined by the use and location of the equipment.

Where higher-risk and/or longer duration tasks are to be performed, the following should be considered by the risk assessment and the safe system of work:

- ensuring that all employees undertaking work at height have received suitable and sufficient information, instruction and training on the management of work at height, commensurate to the level of risk and specialist equipment required. This training must be delivered by suitably qualified and competent trainers;
- considering the physical capabilities of workers such as pregnancy or vertigo sufferers;
- using an existing safe place of work to access work at height;
- deploying collective measures such as guard rails etc. in the first instance rather than personal protection. Fall arrest/restraint equipment should be the last in the hierarchy of control as Personal Protective Equipment (PPE);
- using work equipment to prevent falls, such as scaffolding, mobile access towers or mobile elevating work platforms (MEWPs) which have guardrails around the working platform;
- ensuring that harnesses and a double-hook system are used when ascending/descending any vertical fixed ladder;
- ensuring suitable and sufficient levels of supervision, depending on the level of risk;
- ensuring that a permit to work system is used to control high risk work at height. The permit system is managed by the Estates Department on each acute hospital site;
- ensuring that emergency and rescue procedures are incorporated within the written safe system of work;
- ensuring that all work at height is undertaken using equipment which is suitable, stable and strong enough for the job, suitably maintained and checked prior to each use;
- ensuring that all work at height equipment is uniquely identifiable and subject to a periodic inspection by a competent person. The inspection frequency will be determined by the use and location of the equipment;
- ensuring that, if the work is being undertaken outside, any weather conditions that workers may be exposed to e.g. ice roofs, slippery surfaces in the rain, wind etc. have been considered;
- confirming the condition and stability of work surfaces such as roof lights, skylights, fragile materials, slippery surfaces etc;

- ensuring that there are suitable and sufficient means of preventing unauthorised access to the area underneath the work being carried out;
- minimising the impact on adjacent work activities, or passage of staff adjacent to work at height;
- ensuring that objects, tool or materials etc that cannot fall from height and cause harm;
- preventing access by unauthorised persons, for example by removing an access ladder from a scaffold to deter unauthorised use.

## Information, Instruction and Training

The Manual Handling Team will provide training on handling tasks undertaken at height, including guidance on risk assessment using the TILE method (Task, Individual capacity, Load, Environment), as part of the corporate induction process.

Where only low-risk, short duration tasks are to be performed, line managers should ensure that all staff undertaking the work have received suitable and sufficient information, instruction and training on the management of work at height via a locally delivered Team Brief (see Appendix 1).

Where higher-risk and/or longer duration tasks are to be performed, line managers should ensure that all employees undertaking the work have received suitable and sufficient information, instruction and training on the management of work at height, commensurate to the level of risk and specialist equipment required. This training must be delivered by suitably qualified and competent trainers;

## Monitoring Compliance, Audit & Review

Those Departments whose staff work at height should ensure effective implementation of this policy and compliance through the use of regular inspections, safety walks or similar checking systems, the frequency of which will depend on the level of risk.

Corporate level monitoring and auditing of compliance with this policy will be undertaken as part of the Health , Safety and Security Department audit schedule.

This document will be reviewed every three years or earlier should audit results or changes to legislation / practice within HDdUHB indicate otherwise.

## References and Resources

INDG401 'Working at height: A brief guide'. Health and Safety Executive (HSE).

LA455 'Safe Use of Ladders and Stepladders – a brief guide'. Ladder Association and HSE.

HSG33 'Health and safety in roof work'. HSE.

GEIS5 'Fragile roofs. Safe working practices'. HSE

BS EN 131 Ladders. Terms, types, functional sizes. British Standards Institution.

Work at Height Policy and Procedure, NHS Lothian.

Work at Height Policy, Doncaster and Bassetlaw Teaching Hospitals NHS Foundation Trust.

Health and Safety Executive (HSE) Work at height website: [Work at height - HSE](#) (Opens in new tab)



## Appendix 1: Team Brief – Use of Stepladders\*

\*Stepladders - includes use of Step Stools, Steps, Platform Steps and Mobile Ladders and Mobile Podiums

**Delivered by:** Line managers

**Delivered to:** All staff working within their areas of responsibility who undertake low-risk short duration work at height.

### Background

Falls when working at height remain the most common kind of workplace fatality, accounting for around a quarter of all worker deaths and 8% of all non-fatal injuries every year, with many involving a fall off a ladder. It is essential that people use the right type of work at height equipment for a task and know how to use it safely.

A range of this equipment has been found in hospital and other health board owned and controlled environments. It is quite often the case that some of this equipment is owned by the department, with others owned by other departments including estates but freely available for use by all Health Board staff and sometimes contractors.

The aim of this team brief is to improve the control of this equipment and ensure safe use by all users.

### Key Actions for All Staff

- Identify to the person delivering this training all equipment that you have been using.
- **ONLY** use the equipment that has been provided to you by your line managers.
- **DO NOT** loan this equipment to other departments or Contractors.
- Perform the Pre-Use Safety Checks and abide by the Safe Use Guidance in the following sections:

### Pre-Use Safety Checks

A pre-use check should be carried out:

- by the user;
- at the beginning of the working day;
- after something has changed, e.g. a ladder has been dropped or moved from a dirty area to a clean area (check the state or condition of the feet).

The check should include:

- **the stiles** - to make sure 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;
- **the locking mechanism** - does the mechanism work properly? Are components or fixings bent, worn or damaged? If so, the ladder could collapse. Ensure any locking bars are fully engaged;
- **the stepladder platform** - if it is split or buckled, the ladder could become unstable or collapse;
- **the steps or treads on stepladders** - if they are contaminated or damaged, it could cause the user to slip; if the fixings are loose on the steps, they could collapse.

**If you spot any of the above defects, do not use the ladder and notify your line manager immediately.**

## Safe Use of Stepladders

When using a stepladder to carry out a task:

- Undertake a pre-use check;
- Check that all four stepladder feet are in contact with the ground and that the steps are level;
- Only carry light materials;
- Do not overreach;
- Do not stand on or work on the top three steps (including a step forming the very top of the stepladder), unless it is a Podium Step, or Steps with a suitable handhold;
- Ensure that 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 that it is safer to work side on, e.g. in a stock/storage room when you cannot engage the stepladder locks to work face on because of space restraints, but you can fully lock it to work side on.
- Avoid work that is side-on, especially tasks that impose a side loading;
- Tasks that involve carrying loads should be subject to a manual handling risk assessment – please speak to your supervisor about this.
- Maintain three points of contact at the working position, which means two feet and one hand.

## Safe Use of Mobile Podiums

When both hands need to be free for a brief period, use a mobile podium which is designed to work hands free for brief periods. When using a mobile podium to undertake a task:

- Undertake a visual inspection as normal and ensure that all castors (wheels) retract when weight is placed on the first step, so that the podium is immobile;
- Check the condition of rubber bands on the feet and report any defects;
- Always stand central to the podium, work within arms distance, and at no time lean over the rail;
- Maintain three points of contact when ascending or descending the ladder;
- If carrying a load, the load should be transferred to a co-worker before ascending or descending the ladder;
- Loads should be subject to a manual handling risk assessment.

## Safe Use of Step Stools (Plastic or Metal)

Same basic principle as for Mobile Platforms:

- Check condition of the body for damage including cracks;
- Make sure that the castors (wheels) fully retract when pressure is applied and that all rubber seals are in place and are not damaged;
- Do not lean / stretch whilst using the step stool because it could cause it to move.

For further information please refer to LA455 'Safe Use of Ladders and Stepladders – a brief guide'. Ladder Association and HSE. (Please see [LA455-Safe-Use-of-Ladders-and-Stepladders-A-brief-guide.pdf](https://ladderassociation.org.uk/LA455-Safe-Use-of-Ladders-and-Stepladders-A-brief-guide.pdf) ([ladderassociation.org.uk](https://ladderassociation.org.uk)) – Opens in new tab).

**Remember, if you think the ladder is unsafe, dangerous or not made to standard, do not use it!**

*Thank you for attending*