



Science and  
Technology  
Facilities Council

# **WORK AT HEIGHT**

STFC Safety Code No 9

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## Revisions

1	Initial Launch	November 2007
1.1	Amendments to training and audit sections	May 2013
1.2	Changes to more clearly separate ladder use to PUWER code	March 2014
1.3	Document retention policy	August 2014
1.4	Minor changes to 4.2 and 4.4.3	April 2015
1.5	Minor change to Permit in Appendix 2	March 2018
1.6	Minor change to 4.1.2 and updates to reflect the launch of SHE Assure	October 2018
1.7	Update to Roof Work permit (Appendix 2)	January 2020
1.8	Update to reflect Assure name change and new SHE Directory.	April 2022
1.9	Add additional para 4.1.7	December 2022

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# WORK AT HEIGHT

## 1. Purpose

Falls from height are the biggest cause of workplace death in the UK and one of the main causes of major injuries. In 2005/06 falls from height accounted for 46 fatal accidents at work and nearly 4000 major injuries. A third of STFC 'fall from height' injuries, between 2001 and 2007, have had to be reported to the Health and Safety Executive (HSE).

The Work at Height Regulations 2005 protect staff and others against risks to their health and safety while working at height. Previous regulations defined "Work at Height" as being at least two metres high above ground level. The 2005 regulations have **removed this criterion** and place no minimum height for which work at height considerations apply.

This code outlines the steps to be taken by STFC staff to ensure that the risks to the health and safety of STFC staff or others can be effectively managed whilst working at height on Council business.

Work at Height should be avoided where possible. Where this is not possible a suitable and sufficient risk assessment must be undertaken and a safe system of work developed. 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 given to the selection and use of work equipment.

## 2. Scope

This policy is applicable to all staff, contractors, users and tenants working at STFC sites. Contractors may use their own format for risk assessments and method statements but they must meet the standards laid out in this code.

Working at height in an office, or similar low risk environment, can be addressed through the general Risk Assessment process, SHE Code 6 Risk Management, where an appended template office risk assessment can be adapted for use.

This code does not address the issue of erection of scaffolds or mobile work platforms or the statutory inspection of such equipment or the safe use of ladders, see:

- STFC SHE Code 4: Safety and the Safe use of Work Equipment.

This code encompasses specialist 'climbing', for example climbing structures on STFC sites such as RAL or Chilbolton. Specialist climbing procedures exist have been developed to address specific local hazards.

### 3. Definitions

**Work at Height**, is work in any place, including a 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 egress to a place of work. The legislation no longer specifies a minimum height, 'the 2m rule'. For example, work on the roof of a building, experimental hutch, Portacabin or other raised platform that does not have edge protection. The majority of external building roofs are under the control of site Estate teams and have edge protection.

**Roof** – is the uppermost covering or part of a structure. The structure may be inside another structure (e.g. an experimental hutch).

**Work Equipment** – means any machinery, appliance, apparatus, tool or installation for use at work (PUWER 1998)

## 4. Responsibilities

### 4.1. *Managers and Supervisors of work at height shall:*

- 4.1.1. ensure that every effort is made to avoid working at height and that where it cannot be avoided a suitable and sufficient assessment of the risks to health and safety is completed before the work is carried out.

The risk assessment should be based upon SHE Code 6 Risk Management and specific guidance in assessing the hazards associated with work at height can be found at Appendix 1.

- 4.1.2. provide suitable work equipment or other measures, such as guard-rails at edges or cover plates over gaps or holes, to prevent falls where work at height cannot be avoided and ensure that all equipment used while work at height is being carried out is properly inspected and maintained.

Areas where regular access is required for maintenance etc. should be protected as far as is reasonably practicable (see HSE document INDG 284 “Working on Roofs”).

- 4.1.3. except for the simplest jobs where the necessary precautions are straightforward and can easily be repeated, ensure that prior to working at height a method statement including emergency procedures, and rescue procedures where fall arrest harnesses are used, has been developed. Ensure where a ‘Permit to work on roofs’ is raised, it is issued and communicated to those undertaking work, see Appendix 2.

- 4.1.4. ensure that all staff who work at height and ‘Permit to work on roof Issuers’, have appropriate information, instruction, training, and supervision to ensure their competence, see Appendix 4 for training requirements.

- 4.1.5. ensure that contractors do not start any work at height without having provided a suitable risk assessment and method statement.

- 4.1.6. ensure that, where appropriate, all contractors employed are competent to work at height and are appropriately supervised when on site.

- 4.1.7. ensure that staff regularly working at height with no edge protection or fall arrest system in place receive regular medical screening to ensure fitness for this role. This involves working at heights of approximately 2.4m and above, it does not include employees working from kick stools, stepladders, etc.

### 4.2. *Directors shall:*

- 4.2.1. Appoint in writing one or more suitably qualified and experienced “Permit to work on roofs Issuers”; see Appendix 4 for training requirements. The appointment should be recorded in SHE Directory where the geographic/equipment scope of the appointment should be defined.

- 4.2.2. Institute an audit of all roof areas (including internal structures such as experimental hutch roofs or mezzanines) under their control to assess requirements for edge protection where an existing suitable barrier does not provide adequate safety or to control unauthorised access to fragile roofs.

As a general rule at RAL, DL and their outstations the director responsible for RAL and DL estates is responsible for all roof areas associated with the fabric of buildings maintained by STFC.

- 4.2.3. Ensure a register of all roof areas under their control is maintained, identifying where access requires a "Permit to work on roofs". See Appendix 3 for minimal dataset to be included in the register.

#### **4.3. Permit to work on roof issuers shall:**

- 4.3.1. not issue permits for work they are going to carry out themselves unless this has been countersigned by another permit to work on roofs issuer.
- 4.3.2. assess all associated risks involved in working at height (see Appendix 1 for risk factors associated with working at height) and develop a safe system of work, including the selection and, where necessary, the appropriate inspection of suitable equipment.
- 4.3.3. ensure all necessary precautions, including emergency procedures, have been communicated to the person in charge of the work.
- 4.3.4. check the workplace before it is used and any work equipment that may have been installed or assembled prior to use and carry out inspections where required (see HSE Construction Information Sheet No 47 for more information).
- 4.3.5. be responsible for the issue of the permit to work on roofs, for the management of staff and contractors while they are on site, and the cancellation of the permit to work on roofs.
- 4.3.6. act upon any report of an activity or defect likely to endanger safety and report these to their line management, see SHE Code 5 Incident reporting and investigation.

#### **4.4. Employees, tenants, users, contractors shall:**

- 4.4.1. assist line management with the assessment of risks. Inform them if they suspect that the system of work in place is ineffective or inadequate and do not work in area until it is safe to do so.
- 4.4.2. comply with any method statement developed through risk assessment and any requirements of a permit to work on roofs;
- 4.4.3. report all incidents (including near misses) and any defects in equipment to their manager or contract supervising officer, see SHE Code 5 Incident reporting and investigation.

- 4.4.4. inform line management of any known health issues that may preclude them from working at height.
- 4.4.5. carry out a basic pre-use inspection of any equipment and report any defects to their manager or supervisor.



## **Appendix 1 – Guidance for undertaking work at height risk assessments**

In the event that work at height cannot be avoided, a suitable and sufficient risk assessment must be carried out and a safe system of work developed including the provision of emergency procedures. This should be completed in accordance with STFC guidance in STFC Code 6 'Risk Management'. Where the risks are significant the assessment and method statement **must** be written.

A permit to work on roofs will be required where access is to be gained to any roof area without adequate fixed protection against falls.

### **1.2 Assessing the risks**

When assessing the risks, use must be made of all the information available about the work to be carried out. All foreseeable hazards must be considered in advance and the following issues may need consideration:

Work at height can include, but is not exclusively limited to:

- working at ground level adjacent to an excavation;
- working on roofs without adequate fixed protection;
- working on roofs with unprotected roof lights;
- working from a ladder; and
- working from a scaffold or scaffold tower.

### **1.3 Areas for consideration in the assessment should include:**

- the work activity being carried out;
- frequency of access;
- the duration of the work;
- the location in relation to the presence of hazards such as open excavations, overhead services etc;
- the working environment with regard to weather or 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;
- the equipment to be used and its inspection;
- falling objects;
- impact on adjacent work activities, or passage of staff adjacent to work at height;
- prevention of access by unauthorised persons;
- Weather conditions.

Written risk assessments must be entered in the risk assessment section of *Evotix Assure* the STFC web based SHE management system. Staff should be made

aware of the results of the risk assessments. Risk assessments provided by contractors should be attached as documents in Evotix Assure.

In gathering information for an assessment, managers may need expert advice.

Information on work at heights is available from the HSE website or from the site Safety Offices.

#### **1.4 Developing a Method Statement**

In the development of a written method statement, the information gathered during the risk assessment will be used to construct a document that will give information and instruction to the employees who are to carry out the work.

It will also detail, where necessary:

- collective fall prevention;
- personal fall arrest;
- requirements for inspection;
- the means for 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. icy roofs, slippery surfaces in the rain, wind; and
- any emergency or rescue conditions e.g. it is not acceptable just to rely on the emergency services, this needs to be covered in the risk assessment and planned prior to the work being carried out.

Collective protection measures, e.g. guard rails, should be deployed in the first instance rather than personal protection. Fall arrest/restraint equipment should be the last in the hierarchy of control.

#### **1.5 Rescue Plan**

Any method statement must include a rescue plan that considers how an injured worker could be safely recovered. Speed of response is an essential consideration, especially where a safety harness is being used as a control measure. A person suspended in a harness may be unconscious within five minutes and dead within fifteen minutes if help is not immediately available.

## **1.6 References and further reading**

Further information on working at height can be found at the Health and Safety Executive's website.

Health and Safety Executive	The Work at Height Regulations 2005 A brief Guide INDG 401
Health and Safety Executive	Health and Safety in Roof work HSG 33
Health and Safety Executive	Working on roofs INDG 284
Health and Safety Commission	Safe use of work equipment (Provision and Commission Use of Work Equipment Regulations 1998) Approved Code of Practice and Guidance L22
Health and Safety Executive	Personal protective equipment at work (Personal Protective Equipment at Work Regulations 1992) Guidance on regulations L25
Health and Safety Executive	Safe use of ladders and stepladders INDG 402
Health and Safety Executive	Tower Scaffolds Construction Information Sheet No 10
Occupational Health & Safety magazine	Will Your Safety Harness Kill You? (PDF)

## Appendix 2 - Permit to work on roofs

See external document.

**Appendix 3 – Minimal data to be collected from roof survey:**

- 1) BU/Directorate; Department; Site; Building No
- 2) Location
- 3) Hazards (e.g. Type of roof (sloping, fragile, vents,...; height of roof)
- 4) Controls in place or required (e.g. permit; rails)
- 5) Drawing reference
- 6) Approved Permit to Work on Roofs issuers



## Appendix 4 - Training Requirements

Role	Initial Training	Refresher	Frequency	Comments
<b>Staff &amp; tenants likely to work at height.</b>	1 day	½ day	5 years	Training on the use of equipment and basic height awareness.
Courses Available:	DL – part of 1 day Manual Handling/Work at Height course RAL – Pivotal, KO Training: Safe Working at Heights			
<b>Staff using fall arrest harnesses</b>	1 day	1 day	5 years	
<b>Managers and supervisors of work at height</b>	1 day	½ day	2 years	Training in the selection of equipment and the preparation of risk assessments and method statements
Courses Available:	Pivotal, Working at Height, Management and Supervisory Responsibilities. SafeSite, Managing Height Safety			
<b>Permit to work on roof Issuers</b>	As Managers Above + ½ day	As Managers Above + ½ day	2 years	Additional training in the general requirements for permit systems
Courses Available	DL – Internal Permit Awareness Course Pivotal, Permit to Work			
<b>Contractors</b>	n/a	n/a	n/a	STFC should ensure that all contractors are competent e.g. by use of relevant competence certification schemes.

## Appendix 5 - Audit Checklist

Ref	Item	Rating	Comments
1 (Section 4.2.2)	Are the registers of roofs complete and up to date?		
2 (Section 4.1.1)	Have documented risk assessments been undertaken for significant activities where work at height is required?		
3	Have these risk assessments been recorded in Evotix Assure?		
4 (Section 4.1.3)	Have method statements been developed for work at height based upon risk assessment (documented or otherwise)		
5 (Section 4.1.3)	Do method statements include emergency and as appropriate rescue procedures?		
6 (Section 4.2.2)	Has all work on designated roofs been conducted under a permit to work on roofs?		
7 (Section 4.1.4)	Are permits to work on roofs signed off correctly by a trained/competent permit to work on roofs issuer?		
8	Do method statements for work on roofs adequately address all hazards and use of PPE?		
9 (Section 4.2.1)	Has an audit of all roof areas been carried out in the past 5 years and suitable barriers, guard rails or covers been provided?		
10	Is there evidence that harnesses or full arrest equipment is in use where appropriate?		
11 (Section 4.1.4) (Appendix 4)	Have all employees who may work at height been adequately trained?		
12 (Appendix 1)	Has safe access and egress been provided where required?		



13 (Section 4.1.5)	Where contractors have undertaken work at height on our behalf do method statements suitably address height hazards?		
14	Have local climbing procedures been reviewed within the past two years?		
15	Are local climbing procedures employed?		
16 (Section 4.2.3)	Have Directors documented the appointment of PTW on roof issuers in the SHE Directory?		

## Appendix 6 Document Retention Policy

<b>Records Established</b>	<b>Minimum Retention Period</b>	<b>Responsible Record Keeper</b>	<b>Location of Records</b>	<b>Comments/Justification</b>
Working at height Risk assessments, permits	Current + 5 Years	Line management	Evotix Assure	SHE Group maintain Evotix Assure Facility
<b>Appointments:</b>				
Work at height Permit issuer	Most Recent	Director	SHE Directory	Appointment Letter