

Work at Height Arrangement

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1. Statement of purpose/objectives

This arrangement will enable Shropshire Council to comply with its legal duties under the working at height regulations to control any risks from working at height and will also assist in meeting Shropshire Council objectives to care for staff.

2. Scope

This arrangement applies to all Shropshire Council employees including part time, temporary staff, volunteers and contractors who may be required to carry out work at height.

3. Assessment of risk from working at height

Shropshire Council has a duty to ensure that an assessment of the risk from work at height to the health and safety of employees and others is undertaken by a competent person. The assessment should be reviewed when it is no longer valid, or there is a significant change. A record of the risk assessment must be kept while it remains relevant and for 3 years from the date of the assessment.

4. Elimination or control of work at height

Shropshire Council has a duty to ensure that the risk from work at height is either eliminated at source or, reduced to the lowest level that is reasonably practicable, by establishing and implementing a programme of organisational and technical measures. Shropshire Council must ensure employees and contractors are aware of the working at height regulations.

5. Personal protective equipment

Shropshire Council has a duty to make personal protective equipment available free of charge to their employees if deemed necessary by the work at height risk assessment.

6. Use and maintenance of equipment

Shropshire Council has a duty to ensure that all equipment provided for working at height is readily available and is maintained in a good state of repair, periodically checked and inspected by a competent person.

Shropshire Council employees must make full and proper use of any equipment provided and any other control measures provided must also be used, any defects discovered must be reported to their immediate supervisor or line manager. Defective equipment must not be used and shall be taken out of service.

7. Information, instruction, training and supervision

Shropshire Council has a duty to provide adequate information, instruction, training and supervision to employees required to carry out work at height. Shropshire Council has an obligation to provide information on the outcome of the risk assessment, and what the effects of the hazards are. Line Managers/Supervisors will ensure that appropriate work practises are observed by employees and contractors working at height.

8. Implementation

Management guidance in the form of frequently asked questions will be provided and updated to support the implementation of the arrangement.

9. Compliance

This arrangement will enable Shropshire Council to comply with statutory requirements and current best practise.

10. Review of arrangements

This arrangement will be reviewed by the Health & Safety Team every three years.

Reviewed by Health and Safety Team - May 2018

Reviewed by Health and Safety Team - February 2021

Working at height

Frequently asked questions

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1.0 Roles and Responsibilities/who does what?

- 1.1 Shropshire Council as a local authority employer, through its Elected Members, has ultimate responsibility for compliance with the Health and Safety at Work etc. Act 1974 and associated legislation.
- 1.2 The Chief Executive and Corporate Management Team are responsible for ensuring:
- The implementation of the working at height arrangement across all areas to ensure a consistency of approach.
 - The allocation of suitable and sufficient resources.
 - Ensuring that progress in the control and management of working at height is monitored effectively.
- 1.3 Group Managers and Heads of Service are responsible for ensuring:
- The implementation of the working at height arrangement and that all employees are familiar with the contents of the arrangement in so far as it is relevant to their role and responsibilities.
 - That managers/supervisors receive sufficient training to undertake their role.
 - The allocation of sufficient resources to effectively manage working at height.
- 1.4 Line Managers/Supervisors are responsible for:
- Identifying employees who are exposed to any working at height hazards.
 - Ensuring that all employees receive information, instruction and training on the management of working at height.
 - Ensuring that any equipment used by employees is assessed and that information on appropriate work practises have been communicated to the employees.
 - Ensuring that appropriate work practises are observed by employees and contractors engaged to carry out work at height, including safe working methods, use of appropriate personal protective equipment, safe working zones, job rotation, appropriate breaks and adherence to the control measures resulting from the risk assessment.
 - Reporting any issues to the Occupational Health and Safety Team.
 - Ensuring that a proper assessment of any work equipment is undertaken prior to purchase or hire.
 - Ensuring that employees take appropriate breaks.
- 1.4.1 Property Services Group (PSG) are responsible for:
- Ensuring that any contractors engaged to carry out work at height are competent to do so.
 - Comply fully with the working at height regulations and follow industry best practise at all times.
 - Where contractors are engaged independently of PSG, then the Service Area Managers letting the contract will take on this responsibility.
- 1.5 The Occupational Health and Safety Team is responsible for:

- Providing advice and guidance to managers on the effective control of working at height within their work place.

1.6 All employees of Shropshire Council are responsible for:

- Complying with the requirements of the arrangement.
- Reporting any concerns to their line manager as soon as possible, including issues of work practices, in order that remedial actions can be taken.

2.0 What will Shropshire Council do for the staff working at height?

The Council will take all reasonable steps to ensure that the risks from working at height to employees are effectively controlled and reduced to the minimum.

3.0 What constitutes working at height?

3.1 Work at height is any place, including a place above or below ground level, where a person can be injured if they fall from that place. Access and egress (getting in and out) from a place of work can also be work at height.

3.2 Working at height is no longer classed simply as any work above 2 metres off the ground. This can range from using a kick stool, to working from a tower scaffold to suspended and powered access equipment.

3.3 Examples of work activities that are classed as working at height include:

- Working on a flat roof.
- Erecting false work and formwork^{note1}.
- Working from any ladder or step ladder.
- Working from suspended and powered access equipment.
- Working at ground level adjacent to an open excavation.
- Working near or adjacent to fragile materials. A fragile material is one that does not safely support the weight of a person and any load they are carrying, examples are: skylights, glass or fibreglass panels.

3.4 Some examples of where the regulation will not apply:

- Walking up and down a staircase in an office.
- Working on the upper floors of an office block or portacabin.
- Slipping or tripping on level ground.
- Sitting in a chair.

4.0 Why are the rules/regulations important?

4.1 The Working at Height Regulations has been made to prevent deaths and injuries caused each year by falls at work.

From 2015/16 to 2019/20 falls from height accounted for 25% of all fatal accidents at work (29 fatalities in 2019/20), with a further 2,735 specified (major) injuries and 2,479 lost time (over 7 day) non-fatal injuries reported to the HSE. They remain a major cause of workplace deaths and one of the main causes of specified injuries (HSE statistics).

5.0 Who is responsible for implementing the regulations?

- 5.1 The regulations place duties on employers, the self-employed, employees and anyone who controls the way working at height is under-taken, for example a principal contractor/contractor, a client, or a principal designer/designer. This duty will include Shropshire Council's employees who are responsible for project design and/or arranging for contractors to carry out work on behalf of Shropshire Council.
- 5.2 Within Shropshire Council all employees, contractors working on behalf of Shropshire Council and all employees who control working at height are required to follow the regulations.
- 5.3 It is the responsibility of the duty holder (the person responsible for organising or planning the work) to carry out an assessment of the risks to those working at height and identify methods of controlling the risks if the need to work at height cannot be avoided.
- 5.4 It is ultimately the responsibility of the Group Manager or Head of Service to ensure that duty holders are not only carrying out their responsibilities but are also competent to do this.

6.0 What are the requirements to work at height?

- 6.1 When considering work at height the following steps should be undertaken:
- Avoid work at height where it is reasonably practicable to do so;
 - Assess the risks
 - Where work at height cannot be avoided, prevent falls using either an existing place of work that is already safe or the right type of equipment;
 - Minimise the distance and consequences of a fall, by using the right type of equipment where the risk cannot be eliminated.
 - Ensure that employees and contractors are competent to do the work and are properly supervised.

7.0 What should the work at height risk assessment contain?

- 7.1 A risk assessment is a requirement of health and safety legislation. It is a careful examination of what could cause harm to people as a result of work activity. It will allow you to take the necessary precautions to prevent harm occurring. In any risk assessment, you will need to:
- Look for the hazards.
 - Decide who might be harmed, and how.
 - Inspect all equipment used for working at height.
 - Evaluate risks and decide whether the existing precautions are adequate.
 - Relay the findings of the risk assessment to all employees.
 - Record all findings.
 - Review your assessment.

- 7.2 In addition, any risk assessment for working at height the following should be considered:

- Working conditions.
- Weather conditions.
- Access and egress.
- Distance and consequence from any fall.
- Duration, frequency of use/task.
- Ease of rescue and evacuation.
- The installation and removal of all equipment.

7.3 After the risk assessment has been conducted, the working at height '**Hierarchy of Control**' should be implemented.

8.0 What is the hierarchy of control?

8.1 Under regulation 6 of the Work at Height Regulations, there is a hierarchy of control for determining how to work at height safely.

The hierarchy must be followed systematically and only when one level is not reasonably practicable may the next level be considered. It is not acceptable to select work equipment from lower down the hierarchy (e.g. personal fall arrest, such as harnesses and lanyards) in the first instance. The hierarchy has three basic steps to consider, in order these are:

- AVOID
- PREVENT
- MINIMISE

8.2 It is the responsibility of the duty holder to:

Avoid – the risk by not working at height - where it is reasonably practicable to avoid working at height then you must do so.

Prevent falls – where it is not reasonably practicable to avoid work at height, assess the risks and take measures to ensure people or objects do not fall.

Minimise - If the risk of a fall cannot be eliminated, work equipment or other measures must be used to minimise the distance and consequences should a fall occur, by using the right type of equipment.

9.0 Should records be kept relating to working at height?

9.1 You are required to keep a record of any inspection for types of work equipment including: guard rails, toe-boards, barriers or similar collective means of protection; working platforms (any platform used as a place of work or as a means of getting to and from work, e.g. a gangway) that are fixed (e.g. a scaffold around a building) or mobile (e.g. a mobile elevated working platform (MEWP) or scaffold tower); or a ladder.

9.2 Any working platform used for construction work and from which a person could fall more than 2 metres must be inspected:

- After assembly in any position;
- After any event, liable to have affected its stability;
- At intervals not exceeding seven days.

- 9.3 Where it is a mobile platform, a new inspection and report is not required every time it is moved to a new location on the same site.
- 9.4 N.B. Records do not have to be kept in a particular form. They can be handwritten or stored electronically. 'Keeping' a record means keeping it safe from loss and unauthorised interference, so that a copy can be supplied when required. You must keep all other records of inspection until the next inspection has been carried out.^{note2}
- 9.5 Records must also be kept of:
- Any medical conditions which may prevent or hinder persons from carrying out activities involved in working at height, such as visual impairments and or loss of hearing.
 - The result of assessment of the risk to which person(s) may be exposed whilst working at height, plus any review or revision made to working arrangements arising from these assessments.
 - Details of information and training provided to persons required to undertake work at height

10.0 Do the rules apply to you?

- 10.1 The Work at Height Regulations 2005 applies to all work where there is a risk of a fall liable to cause personal injury. They place duties on employers, the self-employed, and any person who controls the work of others (e.g. facilities managers or building owners who may contract others to work at height) to the extent they control the work.

11.0 Fragile Surfaces?

- 11.1 You must ensure that no one working under your control goes onto or near a fragile surface, unless that is the only reasonably practicable way for the worker to carry out the work safely, having regard to the demands of the task, equipment, or working environment. If anyone does work on or near a fragile surface, you must:
- Ensure (as far as it is reasonably practicable to do so) that suitable platforms, coverings, guard rails, and the like are provided (and used) to minimise the risk.

Do all that is reasonably practicable, if any risk of a fall remains, to minimise the distance and effect of a fall. If anyone working under your control may go onto or near a fragile surface, you must do all that is reasonably practicable to make them aware of the danger, preferably by prominent warning notices fixed at the approaches to the danger zone.

12.0 Falling objects from height

- 12.1 Where it is necessary to prevent injury, you must do all that is reasonably practicable to prevent anything falling. If it is not reasonably practicable, you must ensure that no one is injured by anything falling.

You must ensure that nothing is:

- Thrown or tipped from height if it is likely to injure anyone
 - Stored in such a way that its movement is likely to injure anyone
- 12.2 If any workplace contains an area in which there is a risk of someone being struck by a falling object or person, you must ensure that the area is

clearly indicated and cordoned off appropriately as far as reasonably practicable so no unauthorised people have access.

13.0 Can I still use ladders?

13.1 There is a common misconception that ladders and stepladders are banned, but this is not the case. There are many situations where a ladder is the most suitable equipment for working at height. These regulations do not ban ladders but say they should be used only when all other safer alternatives for work at height have been ruled out. A risk assessment must show that the task is low risk and of short duration, or that there are site features that mean other equipment is not appropriate. If so, then ladders can be used.

14.0 Do employees need to be trained to use ladders?

14.1 **YES.** Working at Height Regulations state that 'every employer shall ensure that no persons engages in any activity including organisation, planning and supervision in relation to working at height or work equipment for use in such work unless they are competent to do so or, if being trained, is supervised by a competent person'

14.2 Common causes of falls from ladders – see appendix 2

15.0 What ladders do I use?

15.1 **Class 1 and BS EN131 ladders only.**

The type of ladders suitable for use in the workplace should be identified by your risk assessment. However, it is recommended that Class 3 ladders, i.e. domestic duty rated ladders and step-ladders are **not** used. BS 2037, BS 1129 **Class 1** and BS EN 131^{note3}, metal, wooden and fibreglass ladders and step-ladders which meet these standards will be suitable^{note4}.

N.B. Wooden ladders must not be painted, other than with a clear/transparent varnish.

16.0 What checks, records should I keep?

16.1 Ladders are work equipment and are subject to the requirements of the Provision and Use of Work Equipment Regulations 1998 (PUWER).

16.2 1) All ladders should be numbered individually and placed on an equipment register which records:

- The make/type of ladder
- duty/weight/class rating
- date first put into use

16.3 2) The ladder should be subject to suitable, regular documented management inspections. See checklist appendix 3.

16.4 In practice inspections will be based on the frequency of usage, the type of ladder used and the working environment, along with the outcome of your risk assessment – see guidance appendix 1.

Arrangements should be in place for handling any defect found, which would include repair or removal of the ladder from service.

Ladders should also be subject to a daily pre-use check.

16.5 Defects will include (list not exhaustive):

- cracked, bent or warped stiles
- cracked, bent or missing rungs

- loose defective or missing feet, tie rods, brackets and corrosion of any fittings.

17.0 What is a “Competent person”?

17.1 A ‘competent person’ is defined as someone who by virtue of qualification, experience and training is able to perform a specific activity in a safe manner. Satisfying the Work at Height Regulations involves selecting competent person(s) to do the task; ensuring that the person(s) carrying out the work are properly trained and physically suited to do the task in hand; making sure that they have been supplied with the necessary personal protective equipment.

18.0 Fall prevention

18.1 Ensure the right work equipment has been provided and select collective measures to prevent falls (i.e. guardrails & working platforms) before other measures which may only mitigate the distance and consequences of a fall (such as nets or airbags) or may only provide personal protection from a fall. Refer also to the Personal Fall Protection Equipment Arrangement.

19.0 Safe Systems of Work

19.1 It is imperative that a safe system of work is provided, this will include:

- All work at height must be properly planned and organised, those involved in work at height must be competent.
- The risks from work at height are assessed and appropriate work equipment is selected and used.
- The risks from fragile surfaces must be properly controlled and the equipment for work at height is properly inspected and maintained.

20.0 Unauthorised access

20.1 Ensure that unauthorised access to the danger zone/area is prevented, this may require fencing off the area around the working zone using Heras fencing, using a permit to work regime or by blocking off access (i.e. removal of ladders at the end of the working day). Ensure appropriate warning signs are displayed at all access points.

21.0 Access to information, advice and support

For health and safety advice or support please contact Shropshire Councils Health and Safety Team on (01743) 252819.

industrial rope access trade association.

www.hse.gov.uk Health & Safety Executive.

www.ladderassociation.org.uk/ The Ladder Association.

Notes:

- 1 **Formwork** is best described as “A structure which is usually temporary but can be whole or part permanent, it is used to contain poured concrete to mould it into required dimensions and support until it is able to support itself.”
False work is described as “A temporary structure used to support a permanent structure during the erection until it becomes self-supporting.”
- 2 **Scaffolds** - An inspection and a report, carried out by a competent person

is required for Scaffolds and other working platforms (including tower scaffolds and MEWPs) used for construction work and from which a person could fall more than 2 m. This must be carried out at intervals not exceeding 7 days. Inspected after installation or assembly in any position and inspected after exceptional circumstances which are liable to jeopardise the safety of work equipment.

3 **Ladder Classifications** - There are three main classifications for ladders:

- Class 1 (INDUSTRIAL): Class 1 ladders are suitable for relatively high frequency and onerous conditions of use, carriage and storage.
- Class 2 (LIGHT TRADE) is no longer used as classification on new ladders, this has been replaced by the European Standard (BS) EN 131.
- Class 3 (DOMESTIC): Class 3 ladders are suitable for only low frequency use, where good storage and good carrier conditions occur and are **not** recommended for use in the workplace.

4 **British and European ladder standards**

- British ladder standards (Aluminium ladders) BS. 2037
British ladder standards (Wooden ladders) BS.1129
Class 1 (Industrial) Duty rating 130 kg or 20 stone,
with a maximum vertical static load of = 175kg.
Class 3 (Domestic) Duty rating 95kg or 15 stone,
With a maximum vertical static load of = 125kg.
- European standards: European standards for ladders are EN 131. Now incorporated into a British Standard, BS EN 131 applies to both metal and timber ladders. These ladders have a maximum vertical static load of =150 kg.

Appendix 1:

Frequency of ladder inspections:

As a general guide:

In all cases the ladders/step-ladders must be visually checked by the user before use each working day (report not required).

- Ladders/step-ladders which are in daily use should be subject to a formal visual inspection once every 3 months, records must be kept of this inspection and the ladder marked or labelled to indicate this.
- Ladders/step-ladders which are used once a week should be subject to formal visual inspection every 6 months, records must be kept of this inspection and the ladder marked or labelled to indicate this.
- Ladders/step-ladders which are only used once a month should be subject to formal visual inspection every 12 months, records must be kept of this inspection and the ladder marked or labelled to indicate this.

Inspect after exceptional circumstances which are liable to jeopardise their safety.

N.B. Ladders that are part of a scaffold system or are in use on a construction site will have to be inspected every seven days.

Appendix 2:

Common causes of falls from ladders include those where:	You can help prevent this type of fall if you:
The user over-reaches	Keep your body centred within the ladder Always keep three points of contact with the ladder
The user slips from the ladder	Keep the rungs clean and in good condition Wear non-slip footwear, if necessary clean the soles before using the ladder Are fit to work at height Are trained to use a ladder Keep three points of contact with the ladder Make sure the rungs are horizontal
The ladder wobbles, slips and falls	Position the ladder correctly on a firm, level surface Check the feet of the ladder daily Fasten the ladder at top and bottom Rest the ladder on a firm surface at the top
The ladder breaks	Position the ladder properly, use the 1 in 4 rule for leaning ladders Do not exceed the maximum weight limit on the ladder Only carry light materials or tools (up to 10kg)
Inclement weather conditions	Do not use ladders in icy weather or high or gusty wind conditions/storms etc...

Appendix 3: Example ladder checklist:

Shropshire Council – Formal ladder inspection report						ATTENTION - BEFORE LADDER USE: All ladders must be visually checked for defects by the user. Defective ladders must not be used. All defects must be reported in the first instance to your immediate line manager.					
Ladder id number:		Inspection due:									
Ladder type:		Inspection frequency:									
Location:		Date of next inspection:									
Checked by:		Ladder label updated:									
Check ladders/step-ladders for:						Satisfactory		Comments	Action		
Stiles:	Warping	Cracking/splitting	Bending	Rotting/corrosion	Different lengths	Yes	No				
Rungs:	Missing rungs	Bending	Wear	Loose	Connected to stile	Yes	No				
Feet/End Caps:	Missing feet	Condition	Wear			Yes	No				
Hinges:	Free movement	Excessive play				Yes	No				
Tie rods/Struts/Stay:	Missing rods	Bending	Corrosion			Yes	No				
Rope operated devices:	Operation	Condition				Yes	No				
Hooks, catches, guide brackets:	Operation	Condition				Yes	No				
Additional comments/action to be taken:											
For office use only:		Register updated:									
Form checked by:		Signed:				Dated:					