



St Mary's  
University  
Twickenham  
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## Working at Heights Policy

### HSPG 23

Version 6 - October 2022



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# Policy on Work at Height

## 1 Statement of Policy

This Policy applies to ALL work at ANY height where there is a risk of a fall liable to cause personal injury (Note: the previous 'over 2m height' definition of work at height has been removed).

In the University setting, work at height includes simple tasks such as the retrieval of items from high-level shelving, putting posters up, putting Christmas decorations up, etc. as well as the more obvious risk sectors of construction and maintenance work.

The Work at Height Regulations 2005, /as amended 2009. Regulation 2 states the following:

- A place is 'at height' if (unless these Regulations are followed) a person could be injured falling from it, even if it is at or below ground level.
- 'Work' includes moving around at a place of work (except by a staircase in a permanent workplace) but not travel to or from a place of work. For instance, a sales assistant on a stepladder would be working at height, but we would not be inclined to apply the Regulations to a mounted police officer on patrol.

All work at height must be:

- Avoided if it is reasonably practicable to do the work in some other way;
- Risk assessed;
- Properly planned, organised and supervised as appropriate;
- Carried out in a safe manner, so far as is reasonably practicable;
- Undertaken by competent people, who have had appropriate training;
- Undertaken using appropriate equipment, which is inspected and maintained as required;
- Undertaken in a way that minimises the risk of, and consequences of, persons falling or of falling objects.

The majority of this Policy applies to routine 'office' type work, student projects and day-to-day maintenance tasks using e.g. short ladders and stepladders or working in loading bays, on staging etc. HSPG 23b gives practical guidance for users on the use and inspection of ladders and stepladders.

More detailed requirements apply to higher risk activities that will normally only be undertaken by Facilities Management Services staff and their engineering and maintenance contractors. The guidance (HSPG 23a) includes detailed requirements that apply to existing places of work (e.g. roof work) and means of access for work at height, including the use of: collective fall prevention (e.g. guardrails and working platforms); collective fall arrest (e.g. nets, airbags etc); personal fall protection (e.g. work restraints, fall arrest and rope access) and ladders.

Typical examples of work at height undertaken within the St Mary's University include, but are not limited to:

- Putting up posters on walls and display boards above eye level
- Accessing high shelves for storage
- Changing light bulbs
- Accessing or working on wall mounted equipment, such as monitoring systems and air conditioning units
- Accessing or working on flat roofs

- Accessing large waste skips
- Working in loading bays
- Putting up Christmas decorations
- Using access platforms / ladders within theatres to build scenery
- Art projects
- Building maintenance work
- Grounds work, tree pruning

## 2 Organisation and Responsibilities

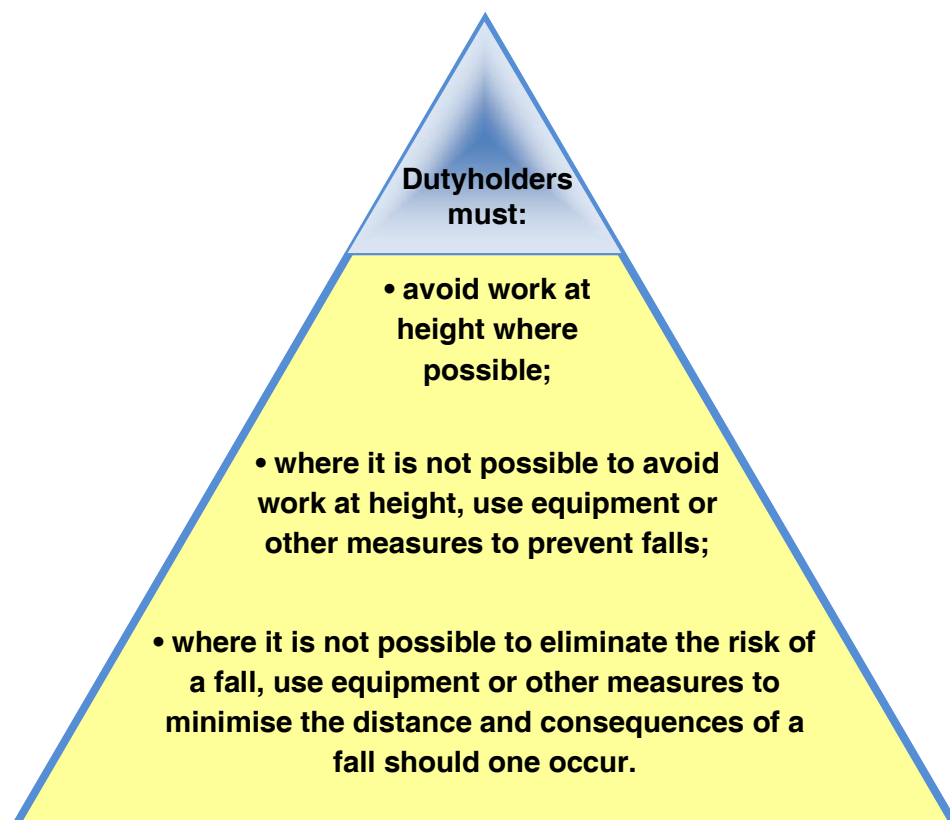
Managers, staff and others (e.g. temporary workers, contractors) have a duty to ensure that work of height is conducted safely, so far as is reasonably practicable.

### 2.1 Duties on managers

Heads of Schools/Directorates and other managers must ensure that:

- All work at height is properly planned and organised;
- Those involved in work at height are trained and competent;
- The risks from work at height are identified and assessed;
- Appropriate work equipment is selected and used;
- Equipment for work at height is properly inspected and maintained;
- The risks from fragile surfaces are properly controlled;
- All work at height takes account of weather conditions that could endanger health and safety;
- The risks from falling objects are controlled.

Managers must ensure that everything that is reasonably practicable is done to prevent anyone falling. The following hierarchy must be followed for managing work at height:



## **2.2 Duties on all staff**

Staff must:

- Report (to your line manager) any activity or defect that is likely to endanger yourself or another person;
- Ensure that you receive appropriate training for working at height;
- Use equipment for working at height in accordance with your training;
- Comply with any instructions or procedures for working at height.

## **2.3 Duties on project managers, engineers and others who supervise contractors**

The duties set out above apply to contractors and their workers who are engaged on University construction and maintenance contracts. There is a duty to ensure the competency of contractors selected to undertake work at height, and there is a shared responsibility to assess the risks of work that could affect University staff, students or any others. The risk assessment and associated safe working rules and procedures must be agreed with the contractor. In so far as University staff control such work, there is a duty to apply the requirements of this Policy.

## **3 Arrangements**

If there is no alternative to working at height, the work must be properly planned, supervised, and carried out in as safe a way as is reasonably practicable.

The following arrangements apply:

- 3.1 For outdoors work, the plan must take account of adverse weather conditions. Work must be postponed if weather conditions are likely to endanger the health and safety of those working at height.
- 3.2 The plan must include what to do in an emergency and for rescue. Reliance on the emergency services (e.g. fire brigade) is not an adequate emergency plan.
- 3.3 Managers must ensure that all those involved in the work are competent. Staff must be trained in how to avoid falling, and how to avoid or minimise injury if they do fall, especially if the risk of a fall has not been entirely eliminated. They must be able to understand the potential hazards of the work and of the equipment being used; be able to recognise defects or omissions in the work or equipment; recognise the health and safety implications; and specify remedial action to make conditions safe.
- 3.4 The place of work must be safe and must normally have features to prevent a fall.
- 3.5 Academic and support staff, including technicians, administrative support, library staff, catering services and maintenance staff, often have to work at raised levels. The appropriate equipment must be provided and used to enable work to be undertaken safely. Staff must know what equipment is available and how to use it safely.
- 3.6 Mezzanine floors must have adequate guarding to prevent a fall and to prevent any materials or objects falling onto the floor below. The floor must be strong enough for the purpose for which the area is being used.

- 3.7 Where equipment is needed to gain access to waste skips, a fixed platform, staging or stepladder with a working platform and guard rails must be provided. A ladder must not be used.
- 3.8 Unauthorised personnel are not permitted to access roofs. Roof access is controlled by Facilities Management Directorate. Where access is required to a roof, a risk assessment must be prepared, taking account of:
- Access and egress (routes on and off for personnel and equipment)
  - The duration of the work
  - The pitch and condition of the roof
  - Any fragile surfaces such as roof lights, unprotected openings, or fragile roofing material
  - Provision of suitable edge protection or alternative methods of protection
  - Exposure to hazardous materials e.g. emissions from local exhaust ventilation
  - Prevention of falling materials
  - Tripping hazards presented by service pipe work etc.
  - Weather conditions (high winds, frost, lightning)
  - Proximity to other hazards e.g. electromagnetic radiation from radio masts
  - Emergency procedures
- 3.9 Other, more specialist work at height may be undertaken on University sites, by grounds and maintenance staff and others. This may include e.g. tree work, gutter cleaning and maintenance. All such work is considered potentially high risk. There must be a safe system of work and working procedures for these types of activities.
- 3.10 If the risk of a fall remains, equipment to prevent a fall must be provided, so far as reasonably practicable. Such equipment must be suitable and give collective protection for the whole workforce e.g. guard rails, priority over personal protection measures e.g. safety harnesses. Consideration should be given to the working conditions; the distance to be negotiated for access and egress; the distance and consequences of a potential fall; the duration and frequency of use; the need for evacuation in the event of an emergency; and any additional risks posed by the use, installation or evacuation of such equipment.
- 3.11 Ladders and stepladders are regarded primarily as a means of access. They should only be used as workplaces for light work of short duration and then only if the use of more suitable equipment is not justified because of low risk and when the residual risk is adequately controlled. It is generally safer to use other equipment such as tower scaffolds, podium steps or temporary stairs (see HSPG 23b).
- 3.12 The following requirements apply to all use of temporary staging, scaffolding and tower scaffolds:
- Formal instruction and training must be provided for all those who erect such equipment.
  - Persons who erect such equipment must be competent.
  - The equipment must be formally inspected by a competent person at intervals while in use – see Appendix 2.
  - The user or other competent person e.g. supervisor, checks the place of work (scaffold, platform, staging etc) on every occasion before the equipment is used.

- 3.13 When work by the Contractor involves the erection of any scaffold, support, shoring or similar structure, he/she is responsible for the incorporation, in addition to the safety of the above, of features such as 'fans', walkways, covers, guardrails, warning lights, etc, as may be necessary for safety. Steps must be taken daily to ensure safety by the removal of ladders or other means of access when work ceases.
- 3.14 Arrangements are also required to ensure that the security of the premises is not compromised by scaffolding, ladders etc outside normal working hours.
- 3.15 Where the University has entered into a separate contract for the provision of scaffolds, the University will make the appropriate arrangements to ensure that the safety of the scaffold is checked initially and at weekly intervals.
- 3.16 The person in charge of the work must ensure that:
- The fall of material or objects from height is prevented;
  - Where it is not reasonably practical to prevent falling material or objects, steps are taken to prevent such materials hitting a person below.
  - Danger areas, where there is a risk of people being struck by falling objects (including a person falling from height), are demarcated and entry by unauthorised persons is prohibited.
- 3.17 With regard to fragile surfaces, Regulation 9 states that the person in charge 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;
  - ensure if anyone does work on or near a fragile surface (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;
  - ensure that 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.
- 3.18 Before proceeding with any work, the person in charge must ensure that all risk assessment, method statement and inspection forms have been completed (see HSPG 23a).
- 3.19 It should be noted that BS EN131 Trade and Industrial ladders are suitable for use on campus. The older Class1/EN131 ladders in use can still be used until they are changed in due course for new BS EN131 Trade and Industrial ladders.
- 3.20 No ladder should have a CE mark on the label as there is no longer a CE certificate scheme for ladders.
- 3.21 Don't overload it – consider workers' weight and the equipment or materials they are carrying before working at height. Check the pictogram or label on the ladder for information.

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