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Version	1

Working at Height Policy

Purpose
The purpose of this policy is to ensure Universal Group comply with The Work at Height Regulations 2005, which is to prevent death and injury caused by a fall from height. As an employer and in control of work at height these regulations apply and support the general Health & Safety Policy.

Scope
This policy applies to all work at height carried out by Universal Group and contractors that may undertake works on behalf of the company. Universal Group have identified there is work at height that will be identified and risk assessed on a project requirement basis.

In all cases risks from working at height shall be identified and mitigations applied prior to work starting.

Definition of Work at Height (taken from HSE website)
Work at height means work in any place where, if precautions were not taken, a person could fall a distance liable to cause personal injury. You are working at height if you:

- Work above ground/floor level
- Could fall from an edge, through an opening or fragile surface or
- Could fall from ground level into an opening in a floor or a hole in the ground

For example you are working at height if you:

- are working on a ladder or steps
- working on a roof.
- could fall through a fragile surface.
- climbing permanent structures such as gantries, communication masts or signal posts.
- working on scaffolding or from a mobile elevated work platform (MEWP).
- working on the back of a flatbed road or rail vehicle.
- using cradles or ropes to gain access.
- using a ladder to gain access to a permanent or temporary structure.

Work at height does **not** include a slip or a trip on the level, as a fall from height has to involve a fall from one level to a lower level, nor does it include walking up and down a permanent staircase in a building.

NOTE: This is regardless of the work equipment being used, the duration the person is at height or the height at which the work is being performed. It includes access to and egress from a place of work.

Policy
Universal Group as an employer and in control of any work at height activity will make sure work is properly planned, supervised and carried out by competent people (a person with sufficient skills, knowledge and experience to perform the task safely. Persons being trained must work under the supervision of somebody competent). This includes using the right type of equipment for working at height. Low-risk, relatively straightforward tasks will require less effort when it comes to planning.

Employees will fulfil their general legal duties to take reasonable care of themselves and others who may be affected by their actions and will co-operate with Universal Group to enable their health and safety duties and requirements to be complied with.
Before working at height, the following steps will be worked through:

- Avoid work at height where it is reasonably practicable to do so.
- 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 / selecting the right type of equipment where the risk cannot be eliminated. Use the
- Ensure a risk assessment has been carried out before work starts.

You should:

- Make sure that people with sufficient skills, knowledge and experience are employed to do the task.
- Do as much work as possible from the ground.
- Ensure workers can get safely to and from where they work at height.

- Ensure equipment is suitable, stable and strong enough for the job, maintained and checked regularly.
- Make sure you don't overload or overreach when working at height.
- Take precautions when working on or near fragile surfaces.
- Provide protection from falling objects.
- Consider your emergency evacuation and rescue procedures.

Permitted Use of Steps
Steps shall only be used when it is not practicable to use other measures or equipment higher up the hierarchy of controls.
A point of work risk assessment is undertaken for the place of work justifying the use of Steps at the required location.

Steps should only be used for short durations, if the task requires the user staying up a stepladder for more than 30 minutes alternative equipment shall be used where reasonably practicably (it may not be reasonably practicable to use alternative equipment such as podiums or towers in areas of limited space).

When there are tasks requiring multiple settings of access equipment that require the use of Steps the combined time of the tasks shall be included where it is reasonably practicable. It may be that an alternative access method needs to be selected to reduce the risk of falls.

In any case the use of Steps would need to be justified if the use of a mobile tower or podium was not appropriate for the work requirement.

Steps can only be used if justified as detailed above; additionally the following conditions shall be met:

- The Steps are Trade and Industrial grade (BS2037 or Class 1 EN131)
- The Steps can be secured (tied off); or
- The Steps are footed; or
- The Steps are used on level stable (firm) ground.
- The Steps are a Ladder step combination and is Class 1 EN131, this type of ladder\steps may be used without ladder mats provided the ladder/steps is or are used on stable (firm) ground, and has manufactures stabilisers fitted
- (Mats may still be required to level the ladder\steps) (Class 1 EN131 has introduced stabilisers on ladders over 3m).

Additionally:

- The user is competent to use the equipment; and
- A pre use check of the equipment is undertaken; and
- Only light, tools & recording equipment are used; and
- The works can be completed without overreaching
- The user can work from the Steps without standing on the top three steps (including a step forming the very top of the stepladder) unless there is a suitable handhold (designed into the steps); and
- Locking devices are engaged; and
- Side loading is avoided (where side loading cannot be avoided the steps must be secured (e.g. tied. Otherwise, use a more suitable type of access equipment); and
- Three points of contact can be maintained at the working position. This means two feet and one hand, or when both hands need to be free for a brief period, two feet and the body supported by the stepladder; and
- Every step ladder shall be used in such a way that a secure handhold and secure support are always available to the user (Save for the point above). The user shall not carry any load up a ladder. Suitable means of carrying loads must be provided, such as tool belts; and
- Tool Lanyards shall be used when reasonably practicable i.e. a suitable securing point for the lanyard is available.

Mobile Elevating Work Platforms (MEWPs)
MEWPs will be hired in from hire companies approved for use on the company's Approved Supplier List. A copy of the in date Certificate of Thorough Examination is to be provided by the hire company, along with in date Harness Inspection Certificates. All documents provided will be retained on the company server.

Inspect the MEWPs prior to initial use and handover. Visually inspect the MEWP before each operation.
Position MEWPs on firm, level ground or rails, within the parameters set by the manufacturer when in use.

MEWPs shall only be operated by trained, competent and certificated persons.

Note: climbing out of the basket using the safety rails is NOT permitted. This is because climbing out of the MEWP basket in these circumstances is potentially hazardous. However, the risk assessment carried out at the planning stage of any work activity involving

work at height may identify the use of a MEWP to gain access to a structure provided that a safe method of access and egress can be deployed.

At least one person who is familiar with the operation of the MEWP shall be at the location ground level where the MEWP is in use. If an emergency arises using a MEWP, the second person shall:

- Operate the MEWP emergency controls and get the casualty to ground level; or
- Call for help

Work from an access platform is performed in the work restraint mode therefore emergency rescue systems for fall arrest are not required.

MEWP only to be used within the manufacturers permit wind limits, an Anemometer is to be used as required to verify the local wind speeds.

Use of Harnesses in MEWPs
Scissor Lift with Fixed Carrier Basket
The operator and staff members within the carrier basket shall be attached to designated harness anchorage points at all times whilst the machine is being operated. Attachment shall be via work restraint to physically prevent personnel being able to fall from the carrier, or over reach beyond the confines of the safe work area.

Once the machine has been positioned at the point of work and the controls disengaged, the operator and staff members do not need to be attached and can move freely within the working platform.

Harnesses shall be worn at all times and shall be attached before the machine is operated or adjusted. The operator shall check that all personnel attach before the machine is operated.

Where harnesses are used within he carrier during work activity, lanyards shall not present a tripping hazard to the user or other personnel.

Other MEWPs (Boom Lift, Cherry Picker, Forklift Mounted Carrier)
The operator and staff members within the carrier shall be attached to the designated harness anchorage points at all times.

Attachments shall be via work restraints to physically prevent personnel being able to fall from the carrier.

Personal Protective Equipment (PPE)
Only consider PPE as a form of protection from falls if;

- Working at height cannot be avoided; and
- Collective safeguards cannot be applied

Work restraint systems can also be used to prevent the worker from over-reaching beyond guardrails. Work restraint systems are preferable to fall arrest systems with shock absorbing lanyards. They do not prevent a fall but mitigate the consequences.

Harnesses and lanyards shall only be used by competent persons following training, or issued to attendees of a IPAF WAH training course. Ensure the hire company provides an in date harness inspection certificate (see MEWPs General). Check harnesses prior to each use. Rectify any defects before use, or do not use the harness and request another from the hire company.

Implementing the Safe Method of Work on Site
Before working at height commences on site, a competent person must complete a point of work risk assessment to determine the risks from work at height are correctly mitigated.

The aim is to:

- Establish there is NO reasonably practicable alternative other than to work at height
- Confirm suitable work equipment to allow safe and practicable work method has been selected
- Confirm the actions taken to prevent falls and to minimise the consequences are suitable

Signed
Richard Lowe
Managing Director

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