

Working at Height Policy

Approval date:	February 2023
Version number:	3.1
Author:	Stephen Lamming, Maintenance Manager
Review date:	February 2026
Security classification:	OFFICIAL – Green: unclassified information

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Document reference number: CEPOL025

NHS Shetland Document Development Coversheet*

Name of document	Working at Height Policy		
Document reference number	CEPOL025	New or Review?	Review
Author	Stephen Lamming, Maintenance Manager		
Information Asset Owner	Stephen Lamming, Maintenance Manager		
Executive lead	Michael Dickson, Chief Executive		
Review date	February 2026		
Security classification	OFFICIAL – Green: unclassified information		

Proposed groups to present document to:		
Health, Safety and Wellbeing Committee	Staff Governance Committee	

Date	Version	Group	Reason	Outcome
09.11.22	3	HSW	PI, /S	PRO
21.02.23	3	SGC	FA	A, INT

Examples of reasons for presenting to the group	Examples of outcomes following meeting
<ul style="list-style-type: none"> Professional input required re: content (PI) 	<ul style="list-style-type: none"> Significant changes to content required – refer to Executive Lead for guidance (SC)
<ul style="list-style-type: none"> Professional opinion on content (PO) 	<ul style="list-style-type: none"> To amend content & re-submit to group (AC&R)
<ul style="list-style-type: none"> General comments/suggestions (C/S) 	<ul style="list-style-type: none"> For minor revisions (e.g. format/layout) – no need to re-submit to group (MR)
<ul style="list-style-type: none"> For information only (FIO) 	<ul style="list-style-type: none"> Recommend proceeding to next stage (PRO)
<ul style="list-style-type: none"> For proofing/formatting (PF) 	<ul style="list-style-type: none"> For upload to Intranet (INT)
<ul style="list-style-type: none"> Final Approval (FA) 	<ul style="list-style-type: none"> Approved (A) or Not Approved, revisions required (NARR)

***To be attached to the document under development/review and presented to the relevant group**

Please record details of any changes made to the document in the table below

Date	Record of changes made to document
February 2009	Creation and Implementation of New Policy.
February 2022	Review of policy
August 2023	Minor formatting changes and addition of reference number by IG Dept.

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1. Introduction

The Work at Height Regulations 2005 (as amended) are in place to protect staff and others against risks to their health while working at height.

Work at height is 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 a means of access or egress to a place of work.

This policy outlines the steps to be taken by NHS Shetland to ensure that staff and others do not work at height where it can be avoided. Where this is not possible a written suitable and sufficient risk assessment must be developed and safe system of work developed and implemented.

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.

This policy is applicable to all staff and contractors working within or for NHS Shetland grounds and premises.

Persons responsible for developing Work at Heights related guidance or procedures, must ensure that it complies with the overarching aims of this organisation-wide policy.

2. Principles

Shetland NHS Board is committed to applying a safe system of work to all working at height related situations as defined in the working at height Regulations (2005), To set an appropriate framework for systematic approach for the management and control of the risks associated with working at height. The board will also implement;

- Suitable and sufficient risk assessments;
- A robust permit to work system is in place;
- Appropriate working at height training;
- Provision of safe, suitable equipment;
- Information and instruction at departmental level.

This policy will be reviewed every three years, and registered holders of the Health and Safety Control Book will be notified of any amendments.

3. Policy Aims

This policy aims to:

- Meet the general commitments to the health and safety of staff described in the Risk Management Strategy and Health and Safety Policy;
- Eliminate high level tasks, which could cause injury, wherever this is reasonably practicable to do so, or reduce risks to the lowest level reasonably possible;
- Ensure that risk assessments are carried out and that the most appropriate equipment is used wherever possible;

- Ensure a permit system is in place and adhered to, all documentation to be completed and filed;
- Make arrangements for putting the policy into practice and make sure we make improvements in controlling the risks created by working at height;
- Reinforce the responsibilities of general or directorate managers and heads of departments for working at height within their areas of responsibility, if applicable; and
- Adhere to the working at height Regulations 2005 and all other legislative and professional guidance.

4. General Strategy

The strategy is to set an appropriate framework for a systematic approach to a safe system of work for the management and control of the risks associated with working at heights;

- Creating a culture, which fosters co-operation, co-ordination, communication and competence.
- Having clear health and safety management processes, responsibilities and accountabilities, including regular active monitoring, audit and review protocols and the enforcement of performance standards where appropriate.

5. Definition

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

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.

6. Responsibilities

The **Chief Executive** has overall accountability for ensuring that the organisational structure, arrangement and resources exist to implement this policy, its objectives, and associated plans to ensure that health, safety and welfare of staff employed by NHS Shetland liable to be affected by the activities of the organisation.

The Chief Executive will review the arrangements for controlling the risks from working at height, and where further controls and/or resource are required to meet the aims for the coming year, these will be included in the annual health and safety report for the organisation's Board.

The Health, Safety & Wellbeing Committee, chaired by the Director of Human Resources, the Committee will act on behalf of the Chief Executive in overseeing how the policy is implemented and ensure it achieves the aims set.

The Health and Safety Lead is the main source of expertise in the control of working at height within NHS Shetland and is a standing member of the Committee.

The Health and Safety Lead will advise the Committee on strategic developments necessary to reduce instances of injury or death resulting from working at height to meet current legislation and best practice.

The Health and Safety Lead is part of the Human Resources and Support Services Directorate, and is responsible for advising managers and staff about their legal obligations and for providing specialist advice and support in relation to the management of manual handling operations. The Health & Safety lead will;

- Advise departmental managers and control book owners on issues relating to working at height, where it is relevant to that particular area.
- Keep up to date with Working at height information and guidance from sources such as the HSE and where improvements in control and management of Working at height are published, disseminate this information through the Health, Safety and Wellbeing Committee.
- Carry out safety inspections and audits to determine the effectiveness of Working at height controls and management systems and where failings are identified, bring this to the attention of the Health, Safety and Wellbeing Committee.
- Monitoring Datix 'Adverse Event' reports to following up on actions to prevent re-occurrences, where applicable.
- Reporting to the HSE any ill-health that is reportable under RIDDOR legislation.

Departmental Managers and Control Book Owners are responsible for:

- Ensuring that every effort is made to avoid working at height;
- Ensuring that, where working at height cannot be avoided, a suitable and sufficient assessment of the risks to health has been carried out;
- Ensuring employees are consulted when assessing the risks associated with working at heights;
- Providing suitable work equipment or other measures to prevent fall where work at height cannot be avoided;
- Ensuring all equipment used while work at height is being carried out is properly inspected and maintained;
- Ensuring that prior to working at height, a written safe system of work, including emergency and rescue procedures, has been developed and where necessary, a permit to work issued;
- Ensuring that all staff who work at height are fit to do so;
- Ensuring that all staff who work at height and those who issue permits to work, have appropriate information, instruction, training and supervision;
- Ensuring that all contractors employed are competent to work at height and are appropriately managed when on site.
- Making sure that Datix incident reports are completed for all injuries or near miss related adverse events which occur in their area of responsibility;

Managers and supervisors who issue permits to work, are responsible for:

- Assessing all associated risks involved at working at height;
- Developing a safe system of work; Ensuring all necessary precautions, including emergency procedures are taken; Checking safety at each stage of the work;
- Acting upon any report of an activity or defect likely to endanger safety;
- Checking the workplace prior to work commencing;
- Checking equipment installed or assembled prior to use;
- The issue of permit to work certificate or its cancellation
- Managing contractors whilst on site.

All staff are responsible for:

- Assisting with the assessment of risks;
- Complying with any safe system of work developed through risk assessment and any requirements of a permit to work;
- Using any safety equipment supplied;
- Following training and instruction;
- Informing their immediate line manager if they suspect that the system of work in place is ineffective or inadequate;
- Reporting any activity or defect likely to endanger safety;
- Reporting all incidents (including near misses) and any defects in equipment using Datix incident reporting system.

The Occupational Health Department is responsible for:

- Carrying out pre-employment screening and making sure that new staff are fit for the duties involved in their post.

Occupational health will provide annual health surveillance screening.

They will discuss with the Ward or Department Head, the Staff Physiotherapists or the Health & Safety Lead any risks which they consider to be significant, bearing in mind patient confidentiality.

All staff can consult the OH Service, confidentially, on any aspect of health and safety while at work.

7. Control and Management Procedures

In the development of a written safe system of work, the information gathered during the risk assessment process will be used to construct a document which will give information and instruction to the employees who carry out the work.

This will include all of the risk control measures and the reasons for their application. E.g. the need to use ladder fixing points.

It will also detail where necessary:

- The means for preventing unauthorised access to the area underneath where the work is being carried out;
- any supervision that may be necessary;
- any weather conditions that workers may be exposed to e.g. icy roofs, slippery surfaces, wind;
- any emergency or rescue conditions e.g. it is not acceptable purely to rely on the emergency services, this needs to be covered in the risk assessment and planned prior to the work being carried out.

NB: Fall arrest equipment should be the last in the hierarchy of control and used by trained personnel only.

Collective protective measures e.g. guard rails should be deployed in the first instance.

8. Training

Training will be required for all operatives required to work at height and for managers or supervisors who issue permits to work. This will enable them to be competent and confident with procedures, legislation and equipment associated with work at height. Training may include the use of ladders, erection and use of scaffolding or the use of cherry pickers.

9. PPE, Hard hats and Hi-Viz clothing

As part of the permit requirement a Hard hat and hi visibility clothing **MUST** be worn at all times when on any roof or high level equipment such as cherry pickers or scaffolding.

10. Monitoring

This policy will be monitored by the Health, Safety and Wellbeing Committee.

The Health, Safety and Wellbeing Committee is responsible for overall monitoring of risk assessments and control measures within NHS Shetland. Any problems highlighted should be brought to the attention of the Chief Executive Officer through the appropriate Committee process.

Outcome and indicators which may be used to evaluate the policy include:

- Is the policy effectively and widely communicated?
- Are staff aware of the policy and its implications?
- Is the policy addressed in local and organisational induction programmes?

This policy will be reviewed every three years from its effective date by the Health, Safety and Wellbeing Committee, reporting to Shetland NHS Board, unless amendments are required due to changes in equipment, work processes or changes in HSE guidance. Under these circumstances, the policy will be reviewed as soon as practicable along with the relevant risk assessments and safe systems of work to consider any gaps in procedures and controls that may have developed.

To assist the Health, Safety & Wellbeing Committee to evaluate the effectiveness of this policy, information from the following key indicators may be utilised:

- Adverse event statistics reported via Datix
- RIDDOR incidents reported to the HSE
- Legal action / claims data
- Sickness absence data
- Occupational health data on health surveillance
- Safety Inspection and audits
- Monitoring planned preventative maintenance and inspection regimes

11. Dissemination and communication

The policy is made available via both the NHS Intranet and NHS Shetland website to ensure ease of access for all staff. Paper copies of the policy are also available in some departments within the Control Book system. The policy is referred to and made available to all relevant staff commencing employment with Shetland NHS Board. This is done as part of their departmental staff induction.

Risk assessments and related safe systems of work are also communicated as part of the departmental induction process.

NHS Shetland will utilise a variety of communication pathways to not only pass on safety information to staff, but also enable 2-way communication and feedback from all staff members. This is achieved by encouraging open and honest dialogue with staff members through team meetings and union safety representatives. These Union representatives also sit on the Health, Safety and Wellbeing Committee and so, have a direct route into the upper echelons of the organisation to highlight safety issues raised by staff.

12. Related documents

- Permit to Work Policy
- NHS Shetland Incident Reporting Policy
- NHS Shetland Personal Protective Equipment Policy
- NHS Shetland Risk Assessment Policy

13. References and further reading

- HMSO The Work at Heights Regulations 2005
- HSE Health and Safety in Roofwork HSG 33
- HSE Working on roofs IND(G) 284
- HSE Safe use of ladders and stepladders IND(G) 402
- HSE Personal protective equipment at work – guidance on regulations L25
- HSC Management of health and safety at work – approved code of practice L21
- HSC Safe use of work equipment – Approved code of practice and guidance L22.

Further information on working at height can be found at the Health and Safety Executives website at <http://www.hse.gov.uk/pubns/fallindx.htm>