

Working at Height Procedure	
Enabling Policy Statement; Executive Owner; Approval Route:	Our Safety - Chief Operating Officer - Compliance Committee
Associated Policy Statements:	N/A
Authorised Owner:	Director of Health and Safety
Authorised Co-ordinator:	Health and Safety Manager (Professional Services)
Effective date:	13 October 2022
Due date for full review:	12 October 2025
Sub documentation:	<ul style="list-style-type: none"> - Flow chart of working at height process (Appendix 1) - Equipment – frequency of inspections and examinations (Appendix 2) - Ladder/stepladder inspection template (Appendix 3)

Approval History

Version	Reason for review	Approval Route	Date
1.0	New Procedure.	University Compliance (Health, Safety and Wellbeing) Committee	13 October 2022

1. Purpose

This procedure establishes the framework for the effective management of work at height for the University of Surrey which includes:

- a) Design and construction of buildings and other structures in relation to working at height.
- b) Development of a safe system of work for any work at height, including permit to work systems.
- c) Management structures (including clearly defined roles and responsibilities) for working at height.
- d) The use and maintenance of work equipment for working at height.

The overriding requirement of this procedure is that all staff, students, and contractors must avoid working at height, wherever possible, and implement suitable and sufficient controls where working at height cannot be avoided. This includes ensuring the safety of those who may be impacted by the work at height (e.g., those working beneath the work at height activity).

2. Scope and Exceptions to the Procedure

This procedure applies to all staff, students, contractors, and visitors who are either controlling, conducting or that could be affected by working at height activities. This procedure applies to all premises, work operations (indoors, outdoors, and off-site) and equipment used in working at height activities under the management and control of the University of Surrey.

This procedure sets out what all staff and students must do to prevent, so far as is reasonably practicable, any person/object falling a distance likely to cause personal injury at any height, but only where the fall would not be considered to have occurred at the same level (e.g., tripping on the stairs or a curb).

Exceptions:

This procedure does not apply to:

- Sporting events, recreational and team building activities.
- Slips, trips, and falls on the same level.

3. Definitions and Terminology

Work at height – means work in any place where, if there were no precautions in place, a person could fall a distance liable to cause personal injury. For example, you are working at height if you:

- Are working on a ladder.
- Working on a flat roof without fixed barrier edge protection.
- Could fall through a fragile surface.
- Could fall into an opening in a floor or a hole in the ground.

Work platform – A working platform can now be virtually any surface from which work can be carried out, such as a roof, a floor, a platform on a scaffold, mobile elevating work platform (MEWP), the treads of a stepladder.

Work equipment – any machinery, appliance, apparatus, tool, or installation for use at work (whether exclusively or not). This includes equipment which employees provide for their own use at work. The scope of work equipment is, therefore, extremely wide.

Fragile surface – any surface that would be liable to fail if any reasonably foreseeable loading were to be applied to it.

Access equipment – any equipment that is specifically designed to allow the user to work safely at height (e.g., ladders, scaffolds, tower scaffolds).

Competent person – a person who has the skills, knowledge, attitude, training, and experience to undertake the role effectively.

Training – equipping staff (and others where the University has a duty-of-care) with relevant skills to deal appropriately with a given health and safety situation. Training will be made available in a range of formats according to the needs of the trainee and different groups of staff, students, and others.

4. Procedural Principles

4.1 Commitment

Recognising that falls from height are a significant cause of workplace fatalities and major injuries, the University will ensure that:

- Organisational arrangements are clearly defined for achieving compliance (see roles and responsibilities section of this Procedure).
- Work at height is avoided wherever possible, where established from a risk assessment, or where a more suitable alternative course of action is available.
- All staff, students and others are protected from the risks associated with working at height.
- All work at height is properly planned, organised, and supervised, with a suitable and sufficient risk assessment carried out by a competent person, and control measures implemented prior to any work commencing.
- Work at height is never carried out alone and is always supervised.
- Where weather conditions endanger health or safety, work at height activities are postponed.
- Those personnel involved in work at height activities receive appropriate training and are provided with suitable access/work equipment so that they can operate safely and without risk to themselves and others.

4.2 Risk assessment

If work at height cannot be avoided, a suitable and sufficient risk assessment must be undertaken. The outcomes of this risk assessment will establish all necessary control measures, including any safe systems of work, and the provision of emergency procedures.

Both regular and irregular activities associated with the task should be considered when carrying out a general risk assessment. Where it is identified that the work at height operation involves occasional or infrequent activities which fall outside the parameters of the general risk assessment, a specific risk assessment should be carried out.

4.3 Selection and management of access/work equipment

4.3.1 Ladders and stepladders

Ladders must only be used for low risk, short duration activities which do not require higher fall protection. Training and risk assessment of the activity is required prior to use of ladders. Pre-use checks must also be carried out by the user at the beginning of the day/job and if something has changed (e.g., ladder has been dropped, damaged, or moved from a dirty location).

- Ensure the stiles are not bent or damaged.
- Ensure the feet are not damaged or missing, they touch the ground fully, and ensure they are clean to prevent slipping.
- Ensure the rungs are not bent or damaged to prevent the ladder from falling.
- Locking mechanism (if any) - ensure they are engaged when the ladder is put in place and are not damaged or worn.
- Ensure the steps on the ladder are clean to prevent slips and the fixing must be secure and not loose as they can collapse.
- Ensure the step ladder platform is not damaged or slippery.

Ladders should be positioned on a firm base at a 1:4 gradient against a wall and secured against a structure, wherever possible. Care must be taken in the placement as not all work areas will be suitable. Ladders must be long enough for the task to avoid over stretching. Always face the ladder

rungs while climbing or descending the ladder. Always maintain three-point contact when using the ladder (one hand and two feet). Step ladders should face the work activity and not be located side on.

4.3.2 Mobile access equipment

There are a variety of different types of equipment including cherry pickers and scissor lifts that are collectively termed as mobile elevating work platforms (MEWPs). They are suitable for roof access and short duration work such as inspection or maintenance. Equipment must be used on firm solid ground. If there is a risk of people falling from the platform, a harness with a short work restraint lanyard must be secured to a suitable manufacturer-provided anchorage point within the basket.

A programme of daily visual checks, regular inspections and servicing schedules should be established in accordance with the manufacturer's instructions and the risks associated with each MEWP.

Operators must report defects or problems to their supervisor immediately. Reported problems should be put right quickly and the MEWP taken out of service if the item is safety critical. Remedial work, if required, should be carried out by a competent person; this may be an external contractor.

The MEWP must be thoroughly examined at least every six months by a competent person or in accordance with an examination scheme drawn up by a competent person.

4.3.3 Working with tower scaffolding

Towers should be erected following a safe method of work, either using:

- Advance guard rail system – where temporary guard rail units are locked in place from the level below and moved up to the platform level. They are in place before the operator accesses the platform to fit the permanent guard rails.
- 'Through-the-trap' (3T) – involves the operator taking up a working position in the trap door of the platform, from where they can add or remove the components which act as the guard rails on the level above the platform. It is designed to ensure that the operator does not stand on an unguarded platform.

Ensure that the tower is resting on firm, level ground with the locked castors or base plates properly supported. Never use bricks or building blocks to take the weight of any part of the tower; stabilisers or outriggers are installed when required by the instruction/operator manual, and that a tower is never erected to a height above that recommended by the manufacturer.

Tower scaffolds must comply with the standard required for all types of scaffolds (e.g., double guardrails, toe boards, bracing and access ladder). When the tower is purchased or hired it should arrive with all the necessary components to prevent falls and ensure stability. Towers rely on all parts being in place to ensure adequate strength; they can collapse if sections are left out. All towers must be inspected following assembly and then at suitable regular intervals by a competent person. In addition, if the tower is used for construction work and a person could fall 2 metres or more from the working platform, then it must be inspected following assembly and then every 7 days. Stop work if the inspection shows it is not safe to continue and put right any faults. The result of an inspection must be recorded and kept until the next inspection is carried out and recorded.

Never use a tower in strong winds, as a support for ladders or other access equipment. When moving a tower, make sure the height is reduced to a maximum of 4 metres, check ground is firm, level, and free from potholes, push or pull by manual effort from base only to avoid tipping over. Never move a tower in windy conditions or with materials or people on it.

4.4 Selection and use of fall protection equipment

The principles of the hierarchy of control are important when selecting appropriate safety equipment for working at height:

- Prevention – guardrails / barriers / purlin trolleys / safety decking.
- Passive arrest – safety nets / fall arrest mats.
- Active arrest – cable and track-based systems.
- Mitigation of any consequences of an accident.
- Personal protective equipment (PPE) – full body harness and a lanyard.

The risk of a fall must, wherever possible, be designed out. If this is not possible, the above hierarchy must be followed in equipment selection.

4.5 Prevention of falling objects and people

The University has a [Hazardous Working Procedure](#) that places strict access control requirements for locations of higher risk. All locations permanent and temporary, have restricted access signage and are secured to restrict access where a fall from height is a risk. The University will either have an access control system in place or locked key access to all high-risk locations, including access ladders, roof access, and or controlled areas within buildings. Key management systems will be in place, where key sign out to restricted areas is tightly controlled and can only be given out through specified processes (like permit to work system or through an authority to access process) by key responsible personnel.

All staff that are given either key card access or have access to keys to these locations, will be assessed as competent to safely enter or be in these locations. Temporary locations for working at height (i.e., scaffolding) must be built and secured to ensure access is restricted, security and access control requirements are included in key contractor information and ensured it is considered at the design stage of a project.

In environments open to public and non-trained staff, appropriate measures must be taken to deter and protect people from accessing locations where they are at risk from falls from height (i.e., restrictions on window opening, secured barrier protection locations (both permanent and temporary), if needed.

4.6 Roof access and fragile surfaces

Any work on the roofs of university buildings whether for maintenance or other reasons must be approved by the Director of Estates and Facilities, or a delegated responsible person(s). Access to roof areas will only be granted to staff or contractors who possess appropriate qualifications, training and/or experience in relation to the type of roof and the nature of the work being carried out. Estates and Facilities will retain a written record of any access granted.

The University conducts surveys of work at height locations ensuring fixed barrier protection is fitted where needed (for both edge protection and for fragile surfaces) and these locations are regularly inspected, with action taken to resolve any issues/problems arising.

All our building roofs are installed with Safety Lines (commonly referred to as 'Mansafe Systems'), that will be inspected in accordance with the relevant regulations; records of inspection and maintenance of the fixed installations are stored within Estates and Facilities.

4.7 Permit to work system

For all non-routine, one-off work or if a contractor is involved, a permit to work will be required. The process and requirements of a permit is explained in detail in the *EFCS Permit to work guidance procedure*. A permit to work may not be required for activities that are carried out routinely and where a risk assessment has identified all necessary control measures, including any safe systems of work, and the provision of emergency procedures.

4.8 Emergency response and planning

Any safe systems of work developed within Faculties or Estates and Facilities must include an emergency plan that considers how an injured worker could be removed safely. The speed of response is an essential

consideration, especially when a safety harness is being used as a control measure. Persons suspended in a harness can become unresponsive in as little as five minutes and may be fatally injured in 15 minutes if help is not immediately available.

Due to the need for rapid response, reliance must not be placed on the emergency services to affect a rescue, unless this has been formally agreed with the emergency services. Rescue procedures could include use of a second MEWP to recover the person, or procedures to safely lower the MEWP and person to the ground.

4.9 Training

Those responsible for managing work at height must ensure that those who undertake such activities receive sufficient information, instruction, training, and supervision, necessary for them to work safely. This will include, but is not limited to:

- The findings of the risk assessment, and the requirements of any safety system of work, associated method statement, and emergency procedures.
- Training relating to the safe operation and use of access equipment, for example:
 - Ladder Safety and Safe Use of Ladders
 - Mobile elevating work platforms (MEWP) – operators will have attended a recognised operator training course (e.g., International Powered Access Federation (IPAF) or equivalent) and received a certificate, card, or 'licence', listing the categories of MEWP the bearer is trained to operate. In addition, formal training for the type of MEWP; operators should have received familiarisation training on the controls and operation of the specific make and model of MEWP they are using.
 - Erection of tower scaffold – persons must be trained and competent and familiar with the type of scaffold to be installed. They should be trained by the Prefabricated Access Suppliers' and Manufacturers' Association (PASMA), or equivalent. Staff using the scaffolding must also be trained on safe use, including emergency procedures.
 - Use of harnesses – staff must undergo IPAF or equivalent training to use and inspect safety harnesses.

4.10 Equipment Inventory

An inventory of access/work equipment owned by each Faculty/Directorate must be maintained. As a minimum, details of the equipment number, stored location, last inspection date, and next inspection due date must be recorded. Any defects that arise from an inspection must also be recorded, including when any equipment is decommissioned or disposed of.

4.11 Responsibilities

4.11.1 Director of Estates and Facilities (within their area of management and control), is responsible for:

- Implementing a management system (including the provision of adequate resources) which ensures the avoidance of working at height where possible, or, where this is not possible, ensures that activities are appropriately risk assessed to establish and implement necessary control measures.
- Appointing (in writing) one or more suitably qualified and experienced 'responsible persons' to assess working at height tasks, including work at height activities which fall within the requirement of a permit to work system.
- Formally identifying the roles and responsibilities of their staff in respect of the day-to-day management of work at height activities.
- Applying for such resources as are appropriate to discharge the University's statutory obligations.
- Periodically reviewing, with relevant staff, the effectiveness of the above management system.

4.11.2 Head of Projects is responsible for:

- Ensuring that for all capital works, building developments and refurbishments, the avoidance of work at height is considered and, if reasonably practicable to do so, implemented at the design

stage.

- Ensuring any staff and contractors engaged by Projects are competent to undertake the work at height tasks they are being engaged to undertake.
- Ensuring any incidents involving working at height are reported and investigated, where necessary, in consultation with the Director of Health and Safety.

Note: The Head of Projects can delegate implementation of the above responsibilities to appropriately competent members of their staff.

4.11.3 Head of Maintenance Services is responsible for ensuring that:

- Working at height is avoided, where possible.
- All work at height is properly planned and organised, ensuring this is proportionate to the risks involved, and that all risks are assessed, periodically reviewed, and risk controls implemented.
- An audit of all roof areas is undertaken (including internal structures such as experimental hutch roofs or mezzanines) to assess requirements for edge, fragile surface protection, or the control of unauthorised access.
- Appropriate fixed barriers and/or other fall arrest systems are installed in any areas where staff must conduct regular routine maintenance or inspections and there is a risk associated with working at height.
- Personal fall protection equipment is supplied correctly for each installation and inspected before first use and then at least every six months or after circumstances which might jeopardize safety have occurred, with inspection records retained. This includes checking that no equipment has been in service for more than the manufacturer's recommended time period.
- Controlled access to restricted locations is implemented where there is a risk of falling from height, ensuring there is a maintained register of all these locations, including those which require a permit to work or an access authorisation.
- There is an adequate supply and range of access equipment (including access and personal protective) available to their staff for the work at height tasks being conducted, it is suitable for the task being undertaken, and staff use it as required.
- A planned preventative maintenance programme is in place for all Estates and Facilities owned equipment used for working at height.
- Safe systems of work and procedures are in place, and that they are followed and regularly reviewed.
- All equipment is inspected in accordance with relevant regulations (i.e., PUWER and LOLER), with records of such inspections maintained, including the retention of a ladder register and associated inspection log.
- A permit to work system is in place that covers high risk working at height tasks, that the system is understood and followed by all those that it affects, including those within the faculties.
- A list of all restricted or controlled spaces due to working at height risks or risk of falling is maintained and kept up to date.
- All staff and contractors engaged by Maintenance Services are competent to undertake the work at height tasks they are being asked to do.
- Any incidents involving working at height are reported and investigated, where necessary, in consultation with the Director of Health and Safety.

Note: The Head of Maintenance Services can delegate implementation of the above responsibilities to appropriately competent members of their staff.

4.11.4 Heads of School/Department/Directorate are responsible for:

- Implementing a management system (including the provision of adequate resources) which ensures the avoidance of working at height where possible, or, where this is not possible, ensures

that activities are appropriately risk assessed to establish and implement necessary control measures.

- Appointing (in writing) one or more suitably qualified and experienced 'responsible persons' to assess working at height tasks, including work at height activities which fall within the requirement of a permit to work system.
- Formally identifying the roles and responsibilities of their staff in respect of the day-to-day management of work at height activities.
- Applying for such resources as are appropriate to discharge the University's statutory obligations.
- Periodically reviewing, with relevant staff, the effectiveness of the above management system.

Note: Heads of School/Department/Directorate can delegate implementation of the above responsibilities to appropriately competent members of their staff.

4.11.5 Managers and supervisors are responsible for ensuring that:

- Working at height is avoided, wherever possible.
- All work at height is properly planned and organised, ensuring this is proportionate to the risks involved, all risks are assessed, periodically reviewed, and risk controls implemented.
- There is an adequate supply and range of equipment (including access and personal protective) available to their staff for the type of working at height tasks being conducted, it is suitable for the task being undertaken, and staff use it as required.
- All their staff (who are required to work at height as part of their role) and contractors (engaged to do working at height tasks) receive information, instruction, and training for the tasks they are required to do.
- They act upon any report of an activity or defect likely to endanger safety and report these to their line management and via the university's online incident reporting system.
- Where, and if needed, they go through the Estates and Facilities permit to work system, conducting all required risk assessments and method statements and act as the working at height task supervisor while the permit is active. Staff should follow the advice and guidance of the permit authoriser, or if not able to perform the role of supervisor, a competent person is engaged to do such work on their behalf.
- Any incidents involving work at height activities within their area of responsibility are reported and investigated, where necessary, in consultation with the Director of Health and Safety.

4.11.6 Permit to Work Authorisers (work at height) will:

- Not issue permits for work they are going to carry out themselves unless this has been countersigned by another permit (working at height) issuer.
- Assess all associated risks involved in working at height and develop a safe system of work, including the selection and, where necessary, the appropriate inspection of suitable equipment.
- Ensure all necessary precautions, including emergency procedures, have been communicated to the person in charge of the working at height task.
- When needed 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.
- Be responsible for the issue of the permits to work, determining if the supplied risk assessments, methods statements, and emergency plans are sufficient for the work to proceed. They are responsible for the management of staff and contractors while they are on site, and the cancellation of the permit.
- Conduct random spot checks on permit to work tasks, to ensure it is safe and all safety features and mitigations are in place, as required.
- Act upon any report of an activity or defect likely to endanger safety, and report these to both their line manager and via the universities online incident reporting system.

- Assist with any accident/incident investigation as requested by line manager or member of the health and safety team.

4.11.7 Contractors

All work undertaken by contractors must only be carried out following approval of relevant risk assessments and method statements detailing how the work will be carried out in a safe manner. Approval will usually be by a Project Manager or Contract Administrator. Contractors working on behalf of the University must:

- Carry out and provide suitable risk assessments for any activities requiring work at height.
- Work to approved method statements with adequate controls to prevent injury to themselves or others who may be affected by their work.
- Provide suitable maintained access equipment to carry out the required work and check that it has been correctly installed before use, and at appropriate periods thereafter.
- Prevent unauthorised entry to access equipment when not in use.
- Report all accidents or near miss to their contact in the University.

4.11.8 Director of Health and Safety is responsible for:

- The provision of advice and guidance on the application of the legislative requirements.
- Where necessary, liaising with the enforcement authorities, including in relation to incidents reported under RIDDOR.
- Monitoring compliance with the requirements of this procedure.

4.11.9 Personnel working at height (including staff and students) must:

- Work in accordance with any risk assessment, method statement or permit to work associated with working at height.
- Undertake and work in accordance with any information, instruction and training provided.
- Use any equipment supplied (including safety devices) properly, and in accordance with training and instruction provided.
- Not undertake any actions which may endanger themselves or other persons.
- Assist with the assessment of risks, informing their manager/supervisor if they suspect that the existing safe system of work is ineffective or inadequate, and stopping any work until advised it is safe to proceed.
- Promptly report any incidents or defects in equipment to their manager/supervisor.
- Inform their manager/supervisor of any health issues that may preclude them from working at height.
- Carry out any required pre-use checks of equipment, reporting any defects to their manager/supervisor.
- Follow the instructions on safety signage, and not access restricted locations they are not approved to enter.

5. Governance Requirements

5.1 Implementation: Communication Plan

The procedure will be available via the University procedures webpages. The procedure is communicated to all those working at height through relevant training.

The Compliance Management Group will be informed, and relevant details disseminated through line management. Faculty Health and Safety Committee will also be informed.

This procedure and relevant supporting documentation are also published on the University Health and Safety intranet site.

5.2 Implementation: Training Plan

Staff and others working at height are required to undergo training as detailed in section 4.10. Training will enable the university to meet the regulatory requirements listed in Section 5.4.1 of this procedure.

5.3 Review

The Central Health and Safety Team will monitor for required changes and updates. Minor changes will be reviewed by the Compliance Management Group and approved by the Compliance (Health, Safety and Wellbeing) Committee. Major reviews will also be reviewed by the Compliance Management Group, prior to submission to Compliance (Health, Safety and Wellbeing) Committee for approval, and if required, noted at Executive Board.

This procedure will be reviewed every three years or in line with relevant changes in legislation, if sooner. The Health and Safety Consultative Committee will be consulted during the review process, as required.

5.4 Legislative Context and Higher Education Sector Guidance or Requirements

5.4.1 Applicable Legislation

This Procedure complies with the requirements of the Health and Safety at Work Act 1974, and other legislation, such as:

- The Management of Health and Safety at work Regulations 1999.
- The Work at Height Regulations 2005.
- The Lifting Operations and Lifting Equipment Regulations 1998.
- The Provision and Use of Work Equipment Regulations 1998.

5.4.2 Legislative context

This procedure sets out to comply with the required 'duty of care' placed upon the University. Under Health and Safety Law a 'duty of care' is generated between organisations and individuals when carrying out activities that could foreseeably cause harm.

The primary duty of care is owed through the employer-employee relationship in which the employer owes a duty of care to ensure that work activities that could result in harm to the employee are assessed and controlled. That duty of care is put into practice by the line management responsibilities as set out in the hierarchy of the organisation.

This duty of care cannot be delegated away; instead, the act of delegation must be accompanied by a realistic and workable system of monitoring or supervision to ensure that the delegated task has been adequately implemented (i.e., the responsibility is not met by giving directions; it is met when those directions have been confirmed as carried out). The result is a cascade of delegated accountability that runs through the organisation via the line management network, accompanied by a system of monitoring, supervision, and feedback.

The duty of care extends to assurance that services provided by others (be they another department of the University or contractors) are undertaken safely. The level of assurance required should be commensurate with the risk of the activity. In addition, anyone carrying out an activity owes a duty of care to anyone who may be put at risk by the activity, such as students, staff, and visitors.

5.4.3 Sustainability

This Procedure has no impact on carbon emissions or on energy consumption.

6. Stakeholder Engagement and Equality Impact Assessment

1.1. An Equality Impact Assessment was completed on **07/10/2022** and is held by the Authorised Co-ordinator.

1.2. Stakeholder Consultation was completed, as follows:

Stakeholder	Nature of Engagement	Date	Name of Contact
Governance	Development and creation of this new Procedure v1.0.	12/07/2022	Ros Allen, Head of Governance Services.
Director of Health and Safety	Development and creation of this new Procedure v1.0.	19/05/2022	Matthew Purcell, Director of Health and Safety.
Members of the Compliance Management Group.	Development and creation of this new Procedure v1.0.	12/07/2022	Members of this Committee.
Members of the Health and Safety Consultative Committee	Development and creation of this new Procedure v1.0.	12/07/2022	Members of this Committee.
Equality, Diversity & Inclusion	Development and creation of this new Procedure v1.0.	12/07/2022	Jo McCarthy-Holland, Equality & Diversity Advisor.