



COMMERCIAL SERVICES & ESTATES DEPARTMENT

Safe Systems of Work
Working at Height Procedure


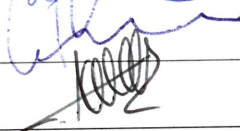

Rev 4

Safe Systems of Work

Working at Height Procedure

Document History

Document Revision	Date	Description of amendments	Revision Author
1	22/05/2017	Procedure developed by Matt Cheney and issued as a departmental procedural document in replacement of the previously titled 'Permit to Work Procedure'.	MC
2	18/12/2018	Annual Review. Update to section 1.3 responsibilities. Update EMM/EPM to AP throughout document.	MC
3	28/01/2020	Annual document review. Update section 1.3 responsibilities to include ETS.	MC
4	02/02/2023	Update director and assistant director titles, update department name throughout.	MC
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SECTION 1

Working at Height Procedure

1.1 Introduction & Scope

1.1.1 This procedure has been developed as part of a suite of Safe Systems of Work (SSoW) for the University of Kent's Commercial Services & Estates (CSE) department. The person with overall responsibility for controlling and updating these procedures is the Assistant Director of Energy & Hard FM and is deemed to be the duty holder.

1.1.2 Compliance with this procedure is mandatory in order to establish safe working practices for the protection of persons under the management of Estates Department. Activities involve work at height operations or the use of any access equipment within the University of Kent campuses. The definition of "work at height" is as follows;

A place is 'at height' if 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

1.1.3 The procedure governs work associated with the University of Kent and applies to both employees of the University of Kent's CSE department and those contractors and suppliers engaged by University of Kent, directly or via third parties, to work on its sites and premises.

1.1.4 All persons who are, or who may be, concerned with the installation, control, operation and / or maintenance of any access equipment; or those whom plan or undertake any working at height activities, shall comply with the University of Kent's working at height procedure, which observes the following statutory provisions:

- The Work at Height Regulations 2005
- Lifting Operations and Lifting Equipment Regulations 1998
- The Health and Safety at Work Act 1974 and subordinate legislation;
- The Management of Health and Safety at Work Regulations 1999

1.1.5 Any work undertaken may also be governed by University of Kent policies and safety rules other than those for safe working at height, such as those applying to general occupational health and safety matters and not least

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the requirement that work activities are subjected to risk assessment and method statement.

- 1.1.6 This procedure outlines the University of Kent's safety rules and arrangements to achieve compliance of the Working at Height Regulations 2005 and to ensure employees and contractors are not exposed to unnecessary risks associated with working at height.
- 1.1.7 These arrangements will assist employees with assessing the risks associated with the various scenarios where it is difficult to eliminate working at height. This procedure also outlines the duties of those persons engaged in working at height activities to enable them to work safely.
- 1.1.8 The University of Kent is committed to provide the necessary resources to enable the management of health and safety risks associated with undertaking work at height.
- 1.1.9 This procedure covers all contractors and staff working on behalf of the CSE department within all University of Kent campuses who are required to carry out any work activity at height.

1.2 Application of the CSE Department Working at Height Procedure

- 1.2.1 All persons who have cause in the normal course of their duties to be involved with or part of this procedure, shall be provided with a copy of this procedure by the appropriate manager.
- 1.2.2 Contractors or any other persons working on university property who have cause to be involved with work outlined in 1.1.4 above, will be supplied with a copy of this procedure by the appropriate manager
- 1.2.3 All employees and persons issued with this procedure shall sign a receipt for their copy and shall keep them in good condition and have them available for reference.

1.3 Responsibilities and Competency

Those having specific responsibilities for working at height matters include the following:

Assistant Director of Energy & Hard FM is the duty holder, who is the person responsible for controlling work activities under The Work at Height Regulations 2002 and updating and maintaining these procedures.

Estates Maintenance Manager (EMM) - A person who fulfils the requirements of a Competent Person (CP) is over 21 years of age, who is

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principally of an engineering/construction discipline or who has significant experience and who has had adequate training to work without danger and accepts responsibility for the safety of others working under his/her direction.

Estates Project Manager (EPM) - A person who fulfils the requirements of a Competent Person is over 21 years of age, who is principally of an engineering/construction discipline or who has significant experience and who has had adequate training to work without danger and accepts responsibility for the safety of others working under his direction.

Estates Technical support (ETS) - A person who fulfils the requirements of a Competent Person is over 21 years of age, who is principally of an engineering discipline or who has significant experience and who has had adequate training to work without danger and accepts responsibility for the safety of others working under his direction.

Both the EMM, EPM and ETS will be considered Authorised Persons (AP) following written authority by the duty holder.

Apart from EMM/EPM and ETS other positions may also be classified as Authorised Persons (AP) and shall receive written authority from the Duty Holder.

The AP shall ensure compliance with the requirements of the Working at Height Regulations 2005 and this safe working procedure by;

- Assessing the risks associated with the work activity and equipment and its potential effect on the surrounding area and processes.
- Deciding whether the work can be carried out in accordance with a standard operating procedure or whether a permit to work is required.
- Issuing the appropriate documentation to the Competent Person, discussing the practicalities of the safety precautions and control measures required.
- To monitor that during the work activity, the work is carried out in line with the permit to work or standard operating procedure. Where the work extends beyond one day, the permit can be extended if the conditions are still applicable.
- To ensure that on completion of the work the Competent Person has left the area in a safe condition and also ensure sign off the work permit.

Authorised persons shall hold recognised formal qualifications beyond their experience with a minimum of City & Guilds or equivalent. Where formal City & Guilds type qualifications have not been attained a

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recognised ONC, HNC, HND or Degree relevant to the AP activity will satisfy this requirement.

Competent Person (CP) - A person who has adequate technical knowledge and experience of safe working at height practices along with the equipment to be used to avoid risk to himself or others for whom he may be responsible. Also see section 2.5

Competent Person(s) shall comply with this procedure by;

- Ensuring receipt from the Authorised Person (AP) of either a safe system of Work or a Work at Height Permit to Work, prior to starting work.
- If a Permit to Work is issued the CP will discuss the safety precautions required with the Authorised Person (AP). Sign for acceptance of the Permit to Work to confirm the understanding of the requirements and the obligation to carry out the instructions correctly.
- Work in compliance with the job instructions and any other control procedures/processes imposed.
- Adhere to any provision in the Safety Document (Safe System of Work or Permit to Work).
- Supervise, erect and maintain any barriers, screens or other protective measures.
- Ensure/arrange communication and/or reporting procedures for emergency situations as appropriate.
- Comply with any monitoring required by the documentation.
- On completion or cessation of the work, confirm that the work area is safe and free from any tools or materials. If a permit was issued, sign it off and return it to the Permit Issuer (Authorised Person).

The AP and the maintenance staff in the University of Kent's CSE Department are deemed to be Competent Persons by reason of qualifications and experience. Also see section 2.5.

All contractors shall have evidence of having received appropriate training and provide a written method statement and risk assessment for review by AP and have a valid Permit-to-Work prior to undertaking any work activities at height. Contractors will comply with this procedure and the duties outlined under Competent Person(s) in this subsection.

1.4 Standard Operating Procedures

Some activities or equipment may have standard operating procedures or similar documentation in place, developed by the CSE department, to ensure safe working practices and methods are adopted. The introduction

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of Standard Operating Procedures can play a positive role in risk reduction and may alleviate the requirement of a Permit to Work at Height. Where it is identified that a Standard Operating Procedure is required it will be the responsibility of the Authorised person (AP) to ensure this is in place.

1.5 Dangerous Occurrences or Accidents

All dangerous occurrences and accidents shall be immediately reported to line management, to the health and safety advisor and to the AP.

1.6 Operational Restrictions

Operational restrictions identified from any source are to be registered with the AP. These may include, but may not be limited to:

- Health and Safety Executive (HSE) safety alerts.
- Manufacturer's product safety alerts.
- Failures of equipment during operation.
- Third party reports or other safety alerts

1.7 Objection to Instructions

If a person has an objection on safety grounds to instructions received for work on, or the operation of, any equipment used for working at height, he/she shall make their objection known to their line manager. The manager shall consider the matter immediately, referring to the AP if the matter cannot otherwise be resolved.

1.8 Signs and Barriers

Responsibility for placing in position or moving any signs or barriers required in connection with the issuing of any written work instruction documents rests with the AP/Competent Person (CP).

1.9 Information, Instruction & Training

Arrangements shall be made by the University to ensure:

- That all employees concerned are adequately trained, informed and instructed as to the system, equipment and area that are affected by particular aspects of work and which legal requirements, safety procedures and related documents still apply.
- That other persons that are not employees but who may be affected by the operations or work also receive adequate information, instruction and training where appropriate.

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Never perform work at height unless you have received the necessary training, have the appropriate experience and have been authorised to undertake the work.

1.10 Review of CSE Department Working at Height Procedure

Due to the nature of any work undertaken at height this procedure will be under constant review, updated and amended accordingly.

SECTION 2

Working at Height Safely

The risk assessment will establish the nature, duration and detail of the work so that the most suitable equipment is selected for those works. The following areas should be considered both within the risk assessment and by all staff who are undertaking the work.

2.1 Planning

Carryout a risk assessment and ensure no work is undertaken at height if it is safe to work another way. Ensure there is adequate supervision and the activities are carried out in a safe manner as far as is reasonably practicable. Select the most suitable equipment for the task and ensure there are plans in place for emergencies and for rescue where required.

2.2 Prior Considerations to Undertaking Work

Before any work is undertaken where it may be perceived that an employee will need to work 'at height', a risk assessment to identify the hazards involved in undertaking the work needs to be carried out, ensuring the hierarchy of controls identified by the Working at Height Regulations which must be adhered to, i.e.:

- Avoid working at height where possible;
- Use work equipment or other measures to prevent falls where working at height cannot be avoided (e.g. Temporary edge protection, MEWP, Mobile Access Tower, Stepladder etc...);
- Where the risk of a fall cannot be eliminated, use work equipment or other measures to minimise the distance and consequences of a fall should one occur (e.g. fall restraint equipment).

2.2.1 Hard hats or bump caps must be worn at all times when working at height.

2.3 Weather

If weather conditions are likely to give rise to unnecessary additional risk to persons, the activity must be postponed until a more suitable time, where reasonably practicable to do so.

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2.4 Training and Competency

Everyone involved in work at height must be competent and trained to use the selected equipment for the job as follows:-

- MEWPS – only operated by IPAF (International Powered Access Federation) (or equivalent) certified operators.
- Mobile access towers – these should only be erected by PASMA (Prefabricated Access Suppliers' and Manufacturers' Association) (or equivalent) trained and certified operatives
- Tube & Fitting scaffold – these must only be erected by an approved scaffold contractor.
- Use of fall arrest and fall restraint systems and harnesses – all persons using such equipment must be trained in their safe use.
- Other equipment and systems that aren't listed here must only be installed, erected and used by competent persons with the appropriate training and/or certificates as applicable.
- Where stepladders are used they must be inspected prior to use. It is forbidden to stand or work off the top rung or platform.

All employees must use equipment provided for their safety in accordance with the instructions and training provided.

2.5 Type and Suitability of Equipment

When selecting equipment for work at height, it must be the most suitable for the task. Wherever possible, give collective protection measures (e.g. guard rails) priority over personal protection measures (e.g. harnesses). Take into account, the working conditions and risks to the safety of all those at the place where the work equipment is to be used.

2.6 Inspections

All equipment used for work at height or access to a place of work shall undergo a visual inspection prior to use.

All items shall be inspected; after they are assembled or installed as often as is necessary to ensure safety, and to make sure that any deterioration can be detected and rectified immediately. This is normally upon first use, after any event that may have caused damage or disturbance to the working platform and every 7 days for equipment that is left in place for this long.

All equipment used for lifting persons is subject to a 6 month thorough inspection as per the requirements of the Lifting Operations and Lifting

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Equipment Regulations 1998 (LOLER). A certificate of this inspection must be provided and must be retained within Estates control.

Any faulty or damaged work or access equipment must be clearly labelled 'DO NOT USE' and must be reported to the CSE Maintenance team to allow a repair or replacement to be arranged.

2.7 Fragile Surfaces

You must ensure that no one working under your control goes onto or near a fragile surface unless, with suitable control measures and PPE, if it is the only reasonably practicable way for the operative to carry out the work safely.

If anyone needs to work on or near a fragile surface you must ensure that suitable platforms, coverings, guard rails, or other safety equipment is provided and used to minimise the risk, and do all that is reasonably practicable to avoid danger. If the risk of a fall remains, to minimise the distance and effect of a fall; a permit to work must be issued for work on or near a fragile surface to ensure that adequate controls have been identified, agreed and communicated.

2.8 Falling Objects

As well as the risk of persons falling from height, you must also consider the risk of objects falling which could give rise to injury to persons below the work area and take reasonable steps to eliminate or mitigate such risks.

You must ensure at all times that nothing is thrown or tipped from height if it is likely to injure any person or stored in such a way that its movement is likely to injure someone.

If the 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 noted and that unauthorised persons are unable to reach it. This is usually achieved through the use of clear signs and physical barriers.

2.9 Wildlife

Care must be taken in areas where wildlife may be present, this should be included in any risk assessment and considered as part of the planning activities.

Where birds are nesting on roofs or other workplaces there is a foreseeable risk that such wildlife may protect the nest and any eggs or

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hatchlings. Where access to these areas is unavoidable during nesting then all persons must wear bump caps or hard hats to protect themselves from attacks from seagulls and other wildlife.

Disturbance of any wildlife in the workplace must be avoided so far as is reasonably practicable, and where this may prevent a work activity from taking place this must be reported to the H&S advisor to allow a decision to be made on how to proceed.

SECTION 3

Working at Height Equipment

3.1 Mobile Access Towers

Generally used for short duration works or for access where erection of scaffolding is not reasonably practicable. Users must be trained and competent in the erection, use and dismantling of mobile tower scaffolding and must hold a current PASMA certificate. Employees must follow the Estates Procedure for erecting and using a mobile access tower.

3.2 Ladders

Use of ladders should only be undertaken following a suitable and sufficient risk assessment and only used as a last resort for short duration works (not exceeding 15 minutes) and where three points of contact with the ladder can be maintained at all times.

Work from a ladder should be restricted to 3 meters or below unless in specific circumstances where a ladder is required which exceeds this height but the work has been thoroughly risk assessed.

Ladders should always be tied securely or footed by another person (if appropriate) when in use. The choice of ladder will be appropriate for its intended use and must be in a good condition and free from any defects. If carrying out any electrical works then ladders must be constructed of non-conductive materials.

All ladders used in the work place must be rated to Class 1 or BS: EN131 and clearly display this on their label. No Class 3 / domestic ladders are permitted for use in the workplace.

All ladders must undergo a periodic inspection and must not be used if they have expired or failed this inspection. Users should check the inspection date before use and also conduct a visual inspection to identify any defects. All inspections must be recorded on the Ladder Register.

3.3 Work on Roofs

Before any work on a University of Kent campus roof is permitted there must be a specific current risk assessment in place. The specific assessments detail those risks associated with access and egress from the workplace and any additional hazards associated with it such as roofs

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which lack edge protection or where isolations are required prior to access.

A permit to work at height applies across all University of Kent campuses. Anyone wishing to undertake work on a roof must first consult the risk assessment.

A permit to work at height will be required where any **one** of the following criteria applies;

- The use of a man-safe system, lanyards or harness is required.
- Temporary edge protection is installed to allow working on roof.
- Isolations of any plant or services is required prior to access.
- Any work activity close to an unprotected edge.
- Any work activity on or near a fragile surface.
- Any work activity that requires fall protection to be installed.
- Any other work considered to be high risk by the AP responsible for engaging a contractor.

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Appendix 1: Permit to Work at Height

Permit to Work at Height Safe systems of Work: Working at Height Procedure	
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Work at Height Permit

Date Time Permit Number

Description of Work

Exact Location of Proposed Work

Checklist

	YES	NO	N/A
Is there a Risk Assessment / Method statement for this task?	<input type="checkbox"/>	<input type="checkbox"/>	
Weather conditions are suitable (high winds, slippery surfaces, etc.)?	<input type="checkbox"/>	<input type="checkbox"/>	
Does the Safety equipment and PPE have current inspection tags and is it in good condition? Fall arrest <input type="checkbox"/> Fall Prevention <input type="checkbox"/> Fall Restraint <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Training in correct use of safety equipment and PPE has been conducted?	<input type="checkbox"/>	<input type="checkbox"/>	
Does the anchor point(s) have a current inspection tag and has it been deemed suitable and tested by a competent person?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has a rescue plan been established if work is being carried out in fall arrest?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is all rescue equipment and are rescue personnel available at the activity site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are personnel medically capable (self-assessed) to perform work at height?	<input type="checkbox"/>	<input type="checkbox"/>	
Has an Observer considered and appointed if necessary?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Workers have all required PPE for the task?	<input type="checkbox"/>	<input type="checkbox"/>	
All access equipment used has current inspection and/ or tags. (scaffolds, MEWPs, ladders)	<input type="checkbox"/>	<input type="checkbox"/>	
Have Access/Egress points been identified and any additional risk mitigated?	<input type="checkbox"/>	<input type="checkbox"/>	
Area affected by work at heights signed & barricaded off?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Risk of exposure to dust or fumes from ducts or outlets? If yes, ventilation has been isolated?	<input type="checkbox"/>	<input type="checkbox"/>	

I confirm that all controls as above have been agreed and I have communicated the requirements of this permit.

UoK Permit Authority Contact No

Signature Date

I confirm that all controls as above are in place and I have understood the requirements of this permit.

Competent Person Contact No

Signature Date

Work Completion

I have inspected the worksite. I am satisfied that the work is complete, all equipment returned and the site safe.

UoK Permit Authority

Signature Date