

WORK AT HEIGHT POLICY AND GUIDANCE

Introduction and Policy Statement

This policy has been developed to comply with Health and Safety Regulations and to reduce and prevent the risk of falls from height.

Elstree Film Studios (EFS) policy is that no work at height will be carried out without a suitable comprehensive risk assessment. Operatives will only be permitted to work at height once they have received appropriate training for working at height, in the use of any equipment and safety equipment provided. All equipment will be maintained and inspected in accordance with the requirements of the Lifting Operations and Lifting Equipment Regulations (LOLER) and best practice.

The Health and Safety Executive (HSE) broad definition for working at height is “work at height means work in any place where, if precautions were not taken, a person could fall down and injure themselves. If you work above ground 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 hole in the ground; you will be working at height, because you can fall from one level to another.”

Work at height includes any work using access equipment, e.g ladders, stepladders, scaffolds, cherry pickers or working on a roof or piece of plant or equipment that you could fall from, and working near any open holes or edges at ground level.

Legal Framework

In addition to the overall responsibility placed on the EFS as an employer under the Health and Safety at Work etc. Act 1974, there are a number of health and safety regulations that need to be applied to work at height, these include: the Management of Health and Safety at Work Regulations 1999 specifically with regard the requirement for risk assessment; the Construction (Health, Safety and Welfare) Regulations 1996; the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) and the Provision and Use of Work Equipment Regulations 1998 (PUWER) with regard to any equipment purchased and used, including safety equipment. The primary legislation, which this policy is based on, is the Work at Height Regulations 2005 (WHR).

Requirements of the Work at Height Regulations 2005

There are duties placed on EFS as an employer and as the person in control of the EFS site and therefore any work at height carried out by contractors or others (eg tenants, production companies etc). These duties include:

Doing all that is reasonably practicable to prevent anyone from falling by applying a basic hierarchy:

- To avoid work at height where it can be
- To use work equipment or other measures to prevent falls where work at height cannot be avoided
- To use work equipment or other collective safety measures to minimise the distance and consequences of a fall should one occur, if it is not possible to eliminate the risk of a fall
- Where possible create a safe place of work (eg permanent guard rails) where work at height is carried out, this responsibility applies to the Council where they are the occupier or owner of premises.

And ensuring that:

- All work at height is planned and organised properly.
- Weather conditions that could endanger health and safety are addressed.
- Staff are trained and competent for any work involving work at height.
- Equipment is maintained and inspected to comply with legislation and best practice.
- Any risk from fragile surfaces (eg falling onto them) is controlled.
- Any risk from falling objects from work being carried out at height is controlled.

Full details of these requirements are given under the guidance section for risk assessment.

Roles and Responsibilities

The Board of Directors

The Board of Directors for EFS being responsible for health and safety will ensure that suitable resources are available to meet the requirements of the Work at Height Regulations and this policy, and ensure that this policy is applied through managers of EFS.

Managers

In addition the general responsibility that line managers hold for the overall health and safety of their staff and the work they carry out, with regard to working at height the line manager is also responsible for:

- Identifying all tasks, which require work at height.
- Where possible avoiding tasks that require work at height or finding alternative ways of working.
- Ensuring that a suitable risk assessment is carried out for all work at height tasks.
- Ensuring that staff they manage have received appropriate training for work at height and do not carry out such work without the training and being competent to do so.
- Ensure that any contractors you or your staff instructs for any work at height are competent.
- Ensure that where personal protective equipment (eg safety harness, fall arrest equipment) is provided as a measure to reduce the consequences of a fall, staff are trained in their use and inspection.
- Ensure that emergency procedures are in place and that staff are aware of these and able to apply them.
- Carrying out monitoring of work at height to ensure staff are following the safety procedures and systems of work put in place.

Individuals

Each person has a responsibility for their own health and safety and that of others who could be affected by their acts or omissions. With regard to work at height individuals are also responsible for:

- Following the safety procedures and controls set out in the risk assessment and any safe systems of work.
- Reporting any hazards or risks, which are not, covered by the risk assessment or you feel are not adequately controlled.
- Using and storing equipment (including safety equipment and personal protective equipment) for its intended purpose and in accordance with training and instruction you have been given. Any damage to equipment must be reported.
- Reporting any incident (accident or near-miss) that they are involved in or witness.
- Reporting any un-safe acts they witness a contractor or other (eg tenant, production company etc) carrying out on EFS site.

All reports should be made to the EFS Site Facilities Manager or Health and Safety Adviser.

Guidance on conducting Risk Assessment

In the first instance a list of all activities that involve work at height must be established. It should then be ascertained if it is possible to avoid work at height for any of the activities (eg by carrying them out from ground level). If it is not possible to avoid work at height then the risk of a fall or the consequences of a fall must be managed.

Managing work at height

Making a work at height workplace safe

Consideration should be given to whether or not it is reasonably practical to put in place permanent control measures such as guardrails or parapet around edges or roofs, or equipment. Such collective protection measures should take priority over personal measures such as use of fall arrest equipment.

All work at height must be carefully planned and a suitable risk assessment prepared and communicated effectively to all those involved in or those who may be affected by the work.

Where edges are not obvious or easily seen these should be marked/highlighted/illuminated.

Work at height within 2 metres of an edge should not be permitted unless there are safety features such as guardrails or personal fall protection is used.

Any access equipment should be suitable for its requirement, eg if tools, equipment and spare parts etc. are required to be taken onto a roof to maintain plant equipment, then a stairway will be more suitable than an vertical enclosed ladder.

Any access equipment, permanent or temporary should not introduce an additional hazard or risk for a fall from height (eg they should have suitable handrails and be located as to avoid any trip hazards).

Use of suitable access equipment

Any access equipment should be suitable for its requirement, eg ladders are only suitable for low risk, short duration work. The risk assessment must identify what is most appropriate for the task and location, eg scaffoldings, scissors lift, elevated work platform. When assessing what is appropriate consideration must be given to the ground surfaces, weather (for external use), pedestrian and vehicle traffic, blocking of any doors etc, work on electricity, overhead obstructions, risk of falling objects, required load bearing, duration of the activity, the activity itself and the training and competence of staff or others who will use the equipment.

Any work equipment used, must be installed by a competent person and regularly inspected and appropriately maintained in accordance with the relevant legislation and best practice, again by a suitably competent person.

Other hazards to consider

If there are any fragile surfaces that work at height is carried out in close proximity to, or above then suitable controls must be put in place. Consider not only the risk of a person or object falling onto or through the fragile surface, but also the risk to any person below or near the fragile surface that could also be at risk. Wherever possible working above a fragile surface should be avoided. If this is not possible, use fixed walkways with guardrails or suitable working platforms with guardrails. Fragile surfaces must be clearly marked with warning signs.

The general environment in itself can pose many hazards, for outdoor work at height this would include the weather, and wind should be specifically considered within the risk assessment, in addition heavy rain can also have an affect on the stability of the ground surface where directly on earth, and staff could have their physical and mental ability whilst working affected by extreme hot or cold conditions.

Minimising the consequences of a fall

It may be necessary in order to minimise the consequences of a fall from height or falling objects from height to use nets, airbags and fall arrest equipment. Any safety equipment used must be suitable and staff trained in its use.

Emergency procedures must be in place, as a quick response is vital to reduce the consequences from injury after a fall, even when the person is using fall arrest equipment. Staff must be aware of, and able to apply emergency procedures without delay.

Key general controls for work at height

As mentioned above, the use of edge protection (eg toe boards, guardrails); maintaining safe distances from an edge; use of fall arrest safety equipment and the use of safety nets can be used to prevent falls or falling objects.

Use the right people for the task. Ensure staff are competent, this should include appropriate training, knowledge, personal ability and attitude to their own safety and that of others. Considering also their general health and fitness (eg vertigo, pregnancy).

Ensure that work areas are kept tidy, so that there are no loose objects that can be knocked over an edge or tripped over to result in the fall of a person.

Where necessary create exclusion zones in areas where work at height is being carried out in order to remove other persons from the risk of being hit by falling objects.

Keep un-authorized persons away from access equipment to prevent any tampering with the equipment and access to a high area where they could fall from.

Ensure that there is adequate lighting whether working indoors or outdoors.

Ensure that the risk assessment and any safe system of work prohibits the throwing or tipping from height of any equipment, debris or other items.

Ensure that any equipment or other items installed or stored at height are secure and cannot be easily disturbed and fall, e.g. safety bonded to a structure.

Provide staff with personal protective equipment where this is necessary (in addition to safety harness), this may include suitable trousers or overalls, high visibility clothing, gloves, suitable footwear, hard hats or safety helmets, the risk assessment must clearly identify what is required.

If you require further information on work at height hazards or controls, please contact the Health and Safety Adviser.

Work at Height Policy for Tenants, Productions Companies etc. at EFS

All tenants, production companies etc. have a legal duty to comply with the Work at Height Regulations and any other legislation that impacts upon work at height. In addition to compliance with EFS site policies and procedures, which include:

The provision of your own health and safety advice with regard to compliance with the law and best practice.

To notify the EFS Site Facilities Manager of any work at height that is planned on the site, in advance.

EFS has the right to request from you copies of any risk assessments or safe systems of work with regard to work at height. Should it be considered that suitable controls are not in place, you will be asked to stop work immediately, failure to do so would result in you being reported to the appropriate enforcing authority for health and safety legislation.



Risk assessments must include control measures to protect other EFS site users where there is a risk to them from any work at height being carried out.

Where any equipment is required as part of control measures, e.g. scaffoldings, scissors lifts, ladders, safety harnesses etc., these must be provided by yourself and maintained and inspected in accordance with legislation and industry guidance (e.g. TG 20, SG4:1`5 for scaffold structures). Operators of machinery or riggers of temporary structures must be appropriately trained and certified/qualified for the machinery or structures to be utilised (e.g. IPAF, PASMA qualified). EFS can request copies of inspection or qualification certificates if it requests.

Please contact info@elstreestudios.co.uk if you have any comments or questions.