

THE STATE HOSPITALS BOARD FOR SCOTLAND

WORKING AT HEIGHT POLICY AND PROCEDURES

Policy Reference Number	OHS20
Issue Number	4.0
Lead Author	Head of Estates and Facilities
Contributing Authors	Estates Manager
Advisory Group	Health and Safety Committee
Approval Group	Policy Approval Group (PAG)
Implementation Date	24 January 2025
Next Review Date	24 January 2028
Accountable Executive Director	Director of Security, Estates and Resilience

The date for review detailed on the front of all State Hospital policies/ procedures/ guidance does not mean that the document becomes invalid from this date. The review date is advisory and the organisation reserves the right to review a policy/ procedure/ guidance at any time due to organisational/legal changes.

Staff are advised to always check that they are using the correct version of any policy, procedure or guidance rather than referring to locally held copies.

The most up to date version of all State Hospital policies, procedures and guidance can be found on the Hospital's Intranet policies page.

REVIEW SUMMARY SHEET

No changes required to policy (evidence base checked)

Changes required to policy (evidence base checked)

Summary of changes within policy:

2024 review

- Names and titles of groups and personnel changed to reflect current model.
- No legislative changes to policy.

CONTENTS

1	BACKGROUND	4
2	SCOPE.....	5
2.1.	Structure of Responsibilities for Working at Heights	5
2.2.	Chief Executive.....	5
2.3.	Designated Person – Director of Security, Estates and Resilience	5
2.4.	Nominated Person - Head of Estates and Facilities.....	6
2.5.	Deputy Nominated Person - Estates Manager	6
2.6.	Competent Persons	7
3	PLANNED / REACTIVE MAINTENANCE ACTIVITY	7
4	COMMUNICATION, IMPLEMENTATION, MONITORING AND REVIEW OF POLICY	7
5	EQUALITY AND DIVERSITY	8
6	STAKEHOLDER ENGAGEMENT	8
7	REFERENCES	8
	APPENDIX 1: APPLICATION OF THIS POLICY AND GUIDANCE	10

1 BACKGROUND

The Health and Safety at Work etc. Act 1974, The Management of Health and Safety at Work Regulations 1999 and The Work at Height Regulations 2005 place a duty on The State Hospital (hereinafter referred to as the "Hospital") to publish, issue and implement an Working at Height Policy which outlines the organisational procedures required to achieve the objectives set out in those legislative documents.

The Work at Height Regulations 2005 applies to all work at height where there is a risk of a fall liable to cause personal injury. This policy and guidance derived from the above regulations applies to virtually all State Hospital work situations from where a person could fall a distance liable to cause personal injury, or access to and from such a place, including volunteers working for the hospital. It includes any place at or below ground level e.g. open excavations, the safe use of ladders, stepladders, tower scaffolds and powered access equipment used by The State Hospital employees, contractors and volunteers.

The Hospital regards Health and Safety as matters of prime importance, which are to be given an equal priority with other business and operating objectives and will ensure, so far as is reasonably practicable, that the safety of employees at work, volunteers, patients, carers and other persons is not adversely affected by any of the Hospital's operational activities.

The Hospital recognises that the lowest acceptable standards of safety are contained in legislation and it is the aim of the Hospital, as an organisation committed to quality performance, to improve upon these standards.

The Hospital is committed to the safe operation of all systems, for which it has a responsibility, by implementing the requirements of Work at Height Regulations 2005.

The Hospital reviews procedures for health and safety matters, identification of hazards and eliminations of risk when working at height, with the safety guidance, to ensure compliance with statutory legislation.

The Hospital proposes to continue to promote and develop a pro-active working at height regime by providing information, training and instruction for all employees, together with safe workplace procedures when working at height.

The effectiveness of the working at height policy and procedures depends to a large extent on the full co-operation and active participation of all employees / volunteers to implement safe work practices and to report on any perceived risk of danger arising when working at height.

The Hospital regards working at height being a responsibility of every employee / volunteers in order to safeguard themselves, their colleagues and other persons within the sphere of the Hospital's interests.

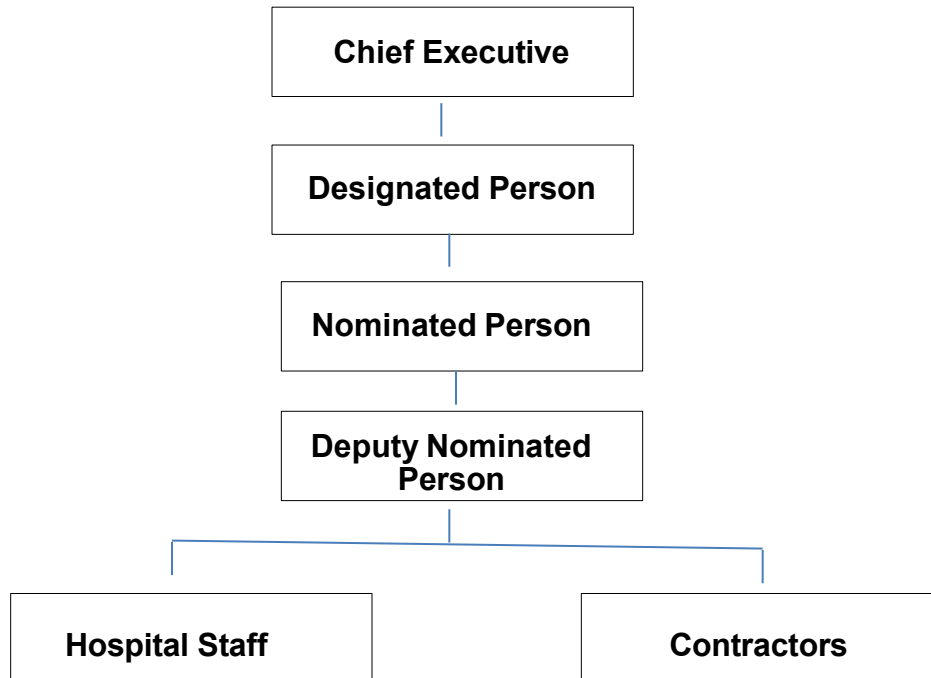
This working at height policy will apply wherever any Hospital employees, volunteers or contractors are working at height which is within the responsibility of the Hospital, wherever it is located (see Appendix 1 Application of this policy and guidance).

If anyone appointed to undertake contracted duties is suffering from a medical condition which may affect their safety and security, the member of staff at the Hospital who is co-ordinating access must be advised. For safety and security reasons, some people may be excluded from parts of the site which could give rise to concerns about their personal safety. In recognition of our responsibilities to the mother and unborn child, this practice also applies to pregnant workers.

2 SCOPE

The Work at Height Regulations 2005 applies to all work at height where there is a risk of a fall liable to cause personal injury. Working at height equipment is also subject to the Provision and Use of Work Equipment Regulations (PUWER) 1998 and the Lifting Operations and Lifting Equipment Regulations (LOLER) 1998 and should be read in conjunction with this advice.

2.1. Structure of Responsibilities for Working at Heights



2.2. Chief Executive

The Chief Executive has the overall authority and responsibility for ensuring compliance with the Work at Height Regulations 2005 for The State Hospital ownership as part of risk management and health and safety policies.

2.3. Designated Person – Director of Security, Estates and Resilience

The Designated Person shall:

- Ensure that all appropriate systems and procedures are in place to implement the requirements of the Work at Height Regulations 2005 within all areas of responsibility.
- Review the effectiveness of the policies and procedures put in place to comply with the Work at Height Regulations 2005.
- Authorise the issue of the Working at Height Policy, its application, and undertake a formal review of its contents.
- Appoint a Nominated Person for working at height to carry out duties and protocols as detailed in the policy.
- Approve and authorise any changes to the policy as required by the Nominated Person.

- Ensure members of staff receive information, instruction and training to carry out their defined responsibilities effectively and safely.

2.4. Nominated Person - Head of Estates and Facilities

The Nominated Person is responsible for managing, monitoring and ensuring:

- To appoint in writing and monitor the day to day activity of the Deputy Nominated Person (Work at Height) and Competent Persons.
- Ensure that all Hospital staff and contractors work in accordance with this policy and procedure.
- Ensure risk assessments and safe working protocols are raised and applied for each “working at heights” activity within their sphere of appointment.
- Ensure records and other documentation required by the Work at Height Regulations 2005 are raised and kept for a minimum of three years.
- Ensure adequate access and safety equipment is provided and that this equipment / plant is uniquely numbered, regularly inspected together with maintaining appropriate records as required by the Work at Height Regulations 2005.
- Monitor the practical implementation of this policy and associated protocols.
- Report to the Designated Person (Work at Height) as required.
- Arranging staff training.
- Full cognisance must be duly taken of the health and safety control book, which incorporates relevant operational procedures, method statements and risk assessment.

2.5. Deputy Nominated Person - Estates Manager

- Ensure training and refresher training for employees (low level activity).
- Ensure risk assessments and safe working protocols are raised and applied for each “working at height” activity within their sphere of appointment.
- Ensure records and other documentation required by the Work at Height Regulations 2005 are raised and kept for a minimum of three years.
- Ensure proper, sufficient and suitable access and safety equipment is provided for the range of activity undertaken by his/her staff and that the equipment is suitably maintained, monitored and recorded.
- Ensure appointed contracted staffs are competent for “working at heights” and carry out their tasks in accordance with all applicable legislation, national guidance and The State Hospital policy / protocols.
- Monitor the practical implementation of this policy and associated protocols.
- Report to senior management as required on “working at heights”.
- Liaise between all people within and outwith the safety management structure as required in the performance of these stated duties ensuring no gaps exist in the delivery of this service and in their duty.
- Not be responsible for below ground level or such specialised activity. This specialised area of works shall be managed by the Nominated Person (Work at Height) and staff.
- Refer any below ground level or other such specialised activity arising within their sphere of authority to the appropriate Nominated Person (Work at Height).
- Indirectly contribute into the annual policy and associated protocols review.
- Monitor the day to day activity of Competent Persons (Work at Height) and other employees undertaking low level activity within their sphere of appointments.
- Ensure training and refresher training for Competent Persons (Work at Height) and employees undertaking low level activity within their sphere of appointment.

- Ensure adequate access and safety equipment is provided and that this equipment / plant is uniquely numbered and regularly inspected together with maintaining appropriate records as required by the Work at Height Regulations 2005.
- Report to the Nominated Person (Work at Height) as required.
- Liaise between all people within and outwith the safety management structure as required in the performance of these stated duties ensuring no gaps exist in the delivery of this service and in their duty.
- Be responsible for high level including roofs, scaffolding or other such specialised activity.
- Accept referrals for below ground level or other such specialised activity from management and shall generally provide day to day advice to management who practice within the Authorised Persons (Work at Height) sphere of appointment. Indirectly contribute into the annual policy and associated protocols review.

2.6. Competent Persons

Competent Persons are those who by their training, certification and experience are capable of supervising or undertaking work at heights.

Each Competent Person will be given a method statement that will clearly state the work to be carried out at height that the competent person is competent to undertake.

- The work to be undertaken will be in accordance with Work at Height Regulations 2005.
- The Competent Person will, at all times, take the necessary safety measures to avoid danger to any person.
- The Nominated Person appoints the Competent Persons in writing, or in the case of indirect labour, will ascertain and be satisfied of the competence of the contractor, their labour and equipment, the details of which must be confirmed in writing.
- The Competent Person will take charge of the work detailed on the method statement and will ensure that the Nominated/Deputy Nominated Persons instructions are followed at all times.
- Full cognisance must be duly taken of the health and safety control book, which incorporates relevant operational procedures, method statements and risk assessments.

3 PLANNED / REACTIVE MAINTENANCE ACTIVITY

All planned maintenance activity should be duly undertaken in accordance with the maintenance management system. All reactive maintenance will be issued through the maintenance management system.

All tasks planned and unplanned will take cognisance of relevant hazards through risk assessment.

4 COMMUNICATION, IMPLEMENTATION, MONITORING AND REVIEW OF POLICY

This policy will be communicated to all stakeholders within the State Hospital via the intranet and through the staff bulletin.

The Health and Safety Committee will be responsible for the implementation and monitoring of this policy.

Any deviation from policy should be notified directly to the policy Lead Author. The Lead Author will be responsible for notifying the Advisory Group of the occurrence.

This policy will be reviewed every three years or earlier if required.

5 EQUALITY AND DIVERSITY

The State Hospitals Board (the Board) is committed to valuing and supporting equality and diversity, ensuring patients, carers, volunteers and staff are treated with dignity and respect. Policy development incorporates consideration of the needs of all Protected Characteristic groups in relation to inclusivity, accessibility, equity of impact and attention to practice which may unintentionally cause prejudice and/or discrimination.

The Board recognises the need to ensure all stakeholders are supported to understand information about how services are delivered. Based on what is proportionate and reasonable, we can provide information/documents in alternative formats and are happy to discuss individual needs in this respect. If information is required in an alternative format, please contact the Person-Centred Improvement Team on 01555 842072.

Line Managers are responsible for ensuring that staff can undertake their role, adhering to policies and procedures. Specialist advice is available to managers to ensure that reasonable adjustments are in place to enable staff to understand and comply with policies and procedures. The Equality and Impact Assessment (EQIA) considers the Protected Characteristic groups and highlights any potential inequalities in relation to the content of this policy.

6 STAKEHOLDER ENGAGEMENT

This policy is governed by specialised national guidance. Therefore engagement with Key Stakeholders is not necessary.

Key Stakeholders	Consulted (Y/N)
Patients	N/A
Staff	N/A
Carers	N/A
Volunteers	N/A

7 REFERENCES

- The Work at Height Regulations 2005 Statutory Instrument 2005 No 735
- The Work at Height Regulations 2005, a brief guide (HSE)
- Safe use of ladders and step ladders: An employer's guide INDG402 10/05
- A toolbox talk on leaning ladder and stepladder safety INDG403 10/05
- Tower scaffolds CIS10 (free leaflet)
- General Access Scaffolds and ladders CIS49 (free leaflet)
- Health and Safety in Construction HSG 150
- Working on roofs INDG284
- HSE Question and answer brief for the construction industry on the work at height
- BS EN 365:1993 personal protective equipment against falls from a height.
- General requirements for instructions for use and for marking (under revision)
- UK Ladder Standards
- BS 2037 – 1994 British standard Specification for Portable aluminium ladders, steps, trestles and lightweight staging's

- BS en131 – 1993 Part 1 “Ladders specification for term types, functional sizes” Part 2 “Ladders specification for requirements testing marking”
- BS 1129 – 1990 British standard specification for portable timber ladders steps trestles, and lightweight staging.
- Health and Safety at work etc Act 1974.
- Safe use of lifting equipment. Lifting Operations and Lifting Equipment.
- Regulations 1998. Approved code of practice and guidance L113 HSE Books 1998 ISBN 0 7176 1628 2.
- Safe use of work equipment. Provision and use of work equipment Regulations 1998. Approved Code of Practice and guidance L22 (second edition) HSE Books 1998 ISBN 0 7176 1626 6
- Provision and use of work equipment regulations (PUWER) 1998 Workplace transport safety: Guidance for employers HSG136 HSE Books 1995 ISBN 0 7176 0935 9
- PSSD PUWER Policy SSD-SP-HS-010

APPENDIX 1

APPLICATION OF THIS POLICY AND GUIDANCE

The Work at Height Regulations 2005

The Work at Height Regulations (WAHR) were introduced in 2005. Their Purpose is simply to reduce the significant death and injury currently occurring each year in the working environment. The regulations apply to virtually all sectors of UK industry, including the health service, and bring together principles relating to work at height regulations. They also reiterate some parts of the Provision and Use of Work Equipment Regulations 1998 (PUWER), the Management of Health and Safety at Work Regulations 1999 (MHSWR) and the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER).

The Provision and Use of Access Equipment falls under the requirements of the Work at Height Regulations 2005.

This policy and guidance derived from the above regulations applies to virtually all State Hospital work situations from where a person could fall a distance liable to cause personal injury, or access to and from such a place, including volunteers. It includes any place at or below ground level e.g. open excavations, the safe use of ladders, stepladders and tower scaffolds, accessed by The State Hospital employees.

Included in this policy and guidance in recognition of the fact that after risk assessment such equipment in some instances may be the only reasonably practical means of carrying out a task. This does not imply that ladders are suitable for any particular task without considering the full requirements of The Work at Height Regulations 2005 (WAHR).

Powered access equipment and Mobile Elevating Work Platforms (MEWP's) either purchased or hired may also be used, but only by employees who have been trained, certificated and are competent to use this type of equipment. This document does not cover any types of scaffolding other than the above or other equipment, e.g. roped access. These areas are regarded as high risk specialist operations, and it is the policy of The State Hospital that they must only be undertaken by specialist contractors / employees with the appropriate training, ability and competency.

Contractors

The State Hospital guidance is intended mainly for the information of its employees but where contractors carry out work on our property risk assessments and method statements will be required prior to work commencing on site. The nominated person or deputy will ensure that all contractors' staff are suitably qualified and certificated for the work being carried out on site. Where contractors are obviously not complying with this code or are undertaking an activity in an unsafe manner, managers shall in the first instance immediately stop the works, discuss the matter with the contractor and their supervisor.