



Work at Height Policy

2025 – 2026

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1.0 Introduction

- 1.1 This Policy procedure and guidance document supports the Company Health, Safety & Wellbeing Policy and covers specific aspects of identifying, preventing or reducing the risks of working at height in line with the requirements of The Working at Height Regulations 2005 and associated legislation.
- 1.2 Work at height is defined as *“work in any place – from which, if no control measures were in place a person could fall a distance, liable to cause personal injury”*. This could be above or below ground level.
- 1.3 The ‘hierarchy of control’ is a process to assist workers to manage when working at height.
- Where possible working at height is **to be avoided** at all times.
 - Use work equipment or other measures (MEWP’s, Tower Scaffolding etc.) to prevent falls where work at height cannot be avoided.
 - Where the risk of a fall cannot be eliminated, use work equipment or other measures (fall restraint and fall arrest equipment, nets, etc.) to minimise the distance and severity of a fall should one occur.

2.0 Aim

- 2.1 The overall aim of this policy is to ensure;
- Work at height is properly planned, supervised and controlled;
 - Ensure a working at height risk assessment is undertaken through effective planning. This assessment requires being maintained for the duration of the work as the very nature of Civil Engineering Works, the work may often create unforeseen work at height risks;
 - Equipment used for work at height is properly inspected and maintained in accordance with both legislation and the manufacturer’s instructions;
 - Suitable warning notices are posted in the work area;
 - Appropriate safety equipment is used;
 - All fragile surfaces are clearly marked at ground level;
 - People working at height are trained, competent and authorised to undertake the work.

3.0 Risk Assessment

- 3.1 All project Risks assessments must be specific to the task and:
- Be undertaken by a competent person;
 - Consider the ‘hierarchy of controls’ and ensure that the most appropriate method of working is selected, and that a record of it is made;
 - Consider third parties, the public and others as a priority during both the planning and execution of the works;
 - Ensure the place of work, including access and egress, is safe;
 - Take account of weather conditions that may endanger health and safety, i.e. high winds, lightning, heavy rain, etc;
 - Ensure risks from fragile surfaces are properly controlled;

- Ensure risks from falling objects / materials are minimised through tethering or collective protection;
- Consider the fall from height from ground level to excavations;
- Plan for emergencies and rescue of operatives from height;
- Communicate and explain the dangers to all those undertaking work at height;
- Consider any surface or ground conditions that may affect plant and equipment;
- Reviewed on a regular basis, annually as a minimum.

4.0 Selection of Work Equipment

- 4.1 Where work at height is not able to be prevented or a safe place of work cannot be provided the Directors must provide equipment for preventing, so far as is reasonably practicable, a fall occurring.

If the precautions selected still do not eliminate the risk of falling, then the Directors must do all that is reasonably practicable to minimise the distance and severity of such a fall.

In selecting equipment for work at height they must:

- Provide and use the most suitable equipment for the task;
- Give collective protective measures such as guard rails etc priority over personal protective measures, i.e. safety harnesses;
- Take into consideration working conditions and the risks to health and safety of those where the equipment is being used.

In addition, the consideration in the use of:

- Scaffolding;
- Mobile Elevated Work Platforms (MEWPs - Boom & Scissors) (See Annex 1);
- Mobile Scaffold Tower - inclusive of Advanced Guard Rail Systems (AGR) (See Annex 2);
- Fall restraint and fall arrest equipment.

5.0 Inspections - General

- 5.1 General Inspections - An area where work is to be conducted at height must be inspected by a qualified person on every occasion prior to work commencing.

In addition, all equipment must be inspected:

- After it is assembled or installed;
- As often as is necessary to ensure its safety with the following as a minimum;
 - Mobile Towers & Scaffolding etc - no longer than 7 days (Recorded);
 - Plant Equipment – Daily and all matters recorded;
- Before use if it has come from another workplace.

The qualified person undertaking the inspection must:

- Prepare a report before going off duty; &

- Give a copy the report to the project manager (Principal Contractor) within 24hrs of its completion;
- The Site Manager or Supervisors must hold 'hard' or printable copies of the report in a safe location;
 - On-site until the work is completed; &
 - Off-site for a further three months (minimum).

5.2 Statutory Inspections - Given the nature of the work conducted by the Company there will be specific work at height equipment which requires being inspected under the laid down statutory provisions.

- Company Owned Equipment - An asset register of all plant and equipment detailing maintenance and inspection records will be kept and maintained. All statutory inspections will be undertaken by a qualified 'third party' within the laid down time provision, with all certifications held centrally.
- 'Hired In' Equipment - All work at height equipment shall be 'hired in' through an Industry recognised company, with all certifications checked on receipt. This certification shall remain with the equipment throughout the hire period, when there is a requirement for re-inspection it is to be completed only by the hire company within the specified statutory period.

6.0 Ladders (Inc Stepladders)

6.1 Ladders are not work platforms; they are used for access and egress. If all other means of safe access have been exhausted and a risk assessment has deemed, it acceptable the follow process will be adhered too;

- A specific Work at Height Plan will be developed identifying the work exclusion zones;
- Approved by the Principal Contractor;
- Use of ladders / Stepladders controlled through a Permit to Work on acceptance.

Once in place then simple short duration work (15 mins maximum) may be undertaken from a ladder (See the Safe Use of Ladders and Step Ladders – Annex 3).

7.0 Control of Falling Objects

7.1 Falling objects can be controlled by ensuring that:

- No material, tools or equipment is thrown or tipped below that may injure someone;
- All items are stored safely in such a way that movement is unlikely to cause injury;
- Above 3m and / or 2m from an edge, all tools are to be tethered to either the operative or machine with a proprietary harness strap;
- Netting is placed around the outside of the work area to capture any falling objects;
- The area below people working at height is a segregated zone by the use of suitable barrier, which is clearly indicated, signed ensuring unauthorised people are prevented from entering that area.

On occasions where it is necessary to move objects from a height, then a proprietary 'chute' shall be introduced to safely channel all objects to a waste receptacle at ground level.

8.0 Information & Communication with Workers

8.1 Where other precautions do not entirely eliminate the risk of a fall occurring, the Directors must ensure that workers are given specific information and training through proprietary training supported by toolbox talks on 'Working Safely at Height'.

9.0 Workers Responsibilities

9.1 Workers must:

- Use the correct equipment whilst at working height;
- Inspect all equipment correctly;
- Wear the appropriate PPE and report any defects;
- Not throw or tip material from height if it is likely to injure someone.

10.0 Legislation

10.1 Current legislation pertaining to the above requirements are;

- Work at Height Regulations 2005
- Management of Health & Safety at Work Regulations 1999
- Lifting Operation and Lifting Equipment Regulations 1998
- Construction (Design & Management) Regulations 2015

Note: This list is by no means exhaustive but identifies some of the key pieces of legislation associated with working at height that requires to be taken cognisance of during the planning of working at height.

11.0 Supporting Documentation

- Safe Use of MEWPs Policy (Annex 1)
- Safe Use of Mobile Towers (Annex 2)
- Safe Use of Ladder & Step Ladder Policy (Annex 3)
- Safety Harness & Lanyard Inspection Register (Annex 4) (SMS – 20)
- Working at Height Checklist



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Safe Use of Mobile Elevating Work Platforms (MEWP's – Boom & Scissors)

Introduction

The aim of this Annex is to clarify the minimum form of protection while working from Mobile Elevating Work Platforms (MEWP's). The guidance is based on industry best practice.

Working Practices

Training Requirements

Operators of Mobile Elevating Work Platforms (MEWP's) must hold an IPAF or another recognised accreditation card approved by either CITB or IPAF. The Cards must appertain to the type of machine being used i.e.

- Self Propelled Booms (SPB)
- Trailer Push-arounds (TPS)
- Vehicle Mounted Platforms (VMP)
- Scissor Lifts (SL)
- Vertical Personnel Platforms (VPP)

An operator who cannot prove competence on these categories of machine is not permitted to use the equipment.

Boom Type MEWP

Personnel in the working platform of a boom-type MEWP's **are** required to use approved full body harness with work restraint systems attached to the manufacturers anchorage point while in the work platform.

The most suitable type of work restraint system is an adjustable lanyard adjusted as short as possible.

Boom type MEWPs include: Self Propelled Booms (SPB), Trailer Push-arounds (TPS) and Vehicle Mounted Platforms (VMP)

Vertical (Scissors) MEWP

Normally it is not necessary for personnel working from a vertical MEWP to wear fall protection equipment, other than in exceptional circumstances as identified by the risk assessment.

MEWP's conforming to BS EN 280:2013 (as amended) - (i.e. all CE marked machines) have work platforms which are provided with guard-rails, mid-rails and toe-boards that provide an equivalent level of protection against falls from height to that on fixed scaffold.

Cognisance must be taken if there is a risk of falling from the work platform as a result of sudden movements caused by an impact, sudden ground collapse, entanglement of the platform or failure of a critical part, an appropriate personal fall protection system must be worn in accordance with BS 8437:2022.

Vertical MEWPs include: Scissor Lifts (SL) and Vertical Personnel Platforms (VPP)

Use of Fall Protection

Consideration must be given for the requirement to wear fall protection systems which is done by carrying out a specific Risk Assessment prior to the commencement of any works.

Risk assessments should consider the following:

- When working next to or in a live highway, is there a risk of a vehicle hitting the MEWP;
- When travelling with the carrier in the raised position could it strike fixed objects in its path (e.g. steelwork, overhead branches, etc);
- When travelling with the carrier in the raised position is the ground uneven;
- Identify the correct equipment to suit the task being carried out;
- The availability of manufacturers rated anchor points within the work platform;
- The rescue of any person in the event of an emergency;
- Validation of Inspections and routine replacement of the fall protection systems.

(Note: The MEWP **must** be suitable for travelling with the carrier in the raised position, otherwise all travel will be undertaken with the carrier retracted.)

Types of Fall Protection Equipment

The two main types of fall protection systems that can be used within the MEWP carrier are:

- Work Restraint Systems
- Fall Arrest Systems

The risk assessments and method statements prepared by the operators must include the following checks:

- Ascertain whether a fall arrest system can be used;
- Does the carrier have suitable anchor points as recommended by the manufacturer;
- The danger of other occupants, loose material or tools being ejected from the carrier if a fall from the carrier occurs;

- When selecting fall arrest equipment following the manufacturer's guidance, operatives must ascertain the minimum clearance height required for the proposed system;
- Consider issues regarding projections, such as balconies, canopies, etc;
- A Rescue Plan is in place.

Guidance on Emergency Rescue at Height from an MEWP

Rescue at Height

There is a requirement of the risk assessment to embrace how a person is to be rescued from a MEWP for any reason. A rescue procedure must be properly planned if the platform is stranded at height and if there is a need for urgency.

The following rescue plan has been compiled in order to comply with current legislation for individuals who work at height. It will be included within the specific Risk Assessments and brought to the notice of those individuals exposed to the risk of working at height and those engaged with both the management and supervision of said works.

Emergency Situation	Proposed Action
The failure of upper control functions while elevated.	Where the normal upper controls functions fail the operator will use the auxiliary controls from the platform to lower the working platform to the ground.
Failure of the operator to be able to effectively operate the MEWP functions while elevated due to the potential following reasons; - Operator incapacitated. - Auxiliary functions fail to operate from upper control station.	If the operator is incapable of lowering the MEWP using the upper controls an appointed person who is familiar with the controls of the machine shall use the 'lower ground' controls to safely lower the working platform.
Failure of lower Ground Controls	Where the 'lower ground' controls fail to allow the working platform to be safely lowered to the ground, the appointed person shall use the auxiliary ground controls to lower the working platform to the ground.
Failure of all normal and auxiliary control functions (Working platform still elevated)	Where all the controls fail a secondary MEWP will act as the rescue machine / platform where; - The rescue machine must be positioned so as to enable the rescue process to be carried out without compromising the safety of personnel involved in the rescue; - The carriers of both machines should be adjacent to each other with a minimal gap between them; - The engines / power on both machines should be switched off during the transfer; - The risk assessment must identify the appropriate fall protection system to be used in the rescue;

	- The lanyard should be attached to the anchor points on the rescue machine prior to the transfer taking place; -Care must be taken not to overload the rescue machine (i.e. which may mean more than one journey to complete the rescue).
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Additional Information

Following any rescue 1st Aid Requires being administered on the Injured Person (IP), where an IP has been suspended from height by their harness, they are to be taken to hospital to be checked / treated for suspension trauma.

In addition, the MEWP which was being used by the IP required being placed 'Out of Use' and a full inspection undertaken by a qualified engineer to ensure the machine is safe to continue normal operation.

Safe Use of Mobile Tower Scaffolds (Inc Advance Guard Rail Systems)

Introduction

The aim of this Annex is to provide guidance and to clarify the minimum standards that are to be achieved whilst using proprietary Mobile Tower Scaffolds. This guidance is based on industry best practice.

Training Requirements

All Operatives who erect, dismantle and inspect a Mobile Scaffold Tower shall hold the minimum qualification of the Prefabricated Access Suppliers & Manufacturers' Association Ltd (PASMA) training course for 'Towers Users'.

Guidelines for Safe Use

Prior to the deployment of a mobile tower a specific risk assessment will be conducted and once fully erected by the competent person (See above) a Pre-Use Inspection shall be conducted. As mobile towers can differ in basic design with different manufacturers the competent person must **always** follow the manufacturers or supplier's instruction manual.

In addition, all Supervisors / Operatives are to ensure the following guidelines are adhered to;

- Working platforms must be accessed by a safe means. Internal ladders or fixed ladders must be used. No individual is to climb up the outside for access or egress;
- Working platforms must be fully boarded out with guard rails and toe boards;
- Brakes must be on before use;
- No movement of the tower scaffold unless it is clear of persons, equipment, or materials – at **NO** time are the towers too be 'surfed', all operatives are to be off the tower prior to it being moved.
- An exclusion zone must be established around the base of the tower with suitable warning signs;
- All tower sections must be fully connected (slotted together);
- The tower should be positioned so that operatives to not have to stretch over the guard rails;
- If the tower requires to be moved check for overhead power cables;
- The tower is to be inspected after assembly and at the start of every shift (Recorded & placed on a 'scaff tag').
- Where there is a requirement for a tower to be used on a slope additional guidance is to be sought from the Directors / H&S consultant prior to commencement of works.

Additional Guidelines

If the height of the tower is to exceed the manufacturers maximum figures it **must** be secured to the structure and additional information sought from a structural engineer.

Where an untied, independent mobile tower is deployed the manufactures guidelines require being consulted as the heights must never exceed;

- 3 x the minimum base width for outdoor use;
- 3.5 x the minimum base width for indoor use;
- Outriggers should be deployed if nearing the maximum heights.

Rescue at Height – Mobile Towers

As with working from an MEWP there is a requirement of the risk assessment to embrace how a person is to be rescued from the erected Mobile Tower any reason. As with all rescues a procedure must be properly planned if the platform is stranded at height and if there is a need for urgency.

The following is the recommended procedure for general works off a mobile tower and can be assessed further for the specific work area in the RAMs.

1. Self-help - This is the first procedure where the person or persons are capable of descending the tower without outside assistance
2. Assisted Descent - This is where the person or persons are capable of descending the tower with the assistance of others (Depending on the injury and location of the tower.
3. Professional Rescue – This is the procedure where the person or persons are totally incapacitated and incapable of descending the tower and need to be removed from the tower by others. If the person or persons are incapacitated such that they are unable to descend the tower even with the assistance of others, then their condition is likely to be such that only the professional medical or rescue services (ambulance and/or fire service) would have sufficient knowledge and skills to affect a safe and successful rescue. It is highly likely that in such circumstance, persons without such professional medical and rescue knowledge and skills, could potentially cause further injury and/or significant risk to themselves or the person or persons in need of rescue.

In these circumstances the Hardgate 1st Aider / Colleague is to support the injured person until the rescue services are in attendance.

The Safe Use of Ladders & Step Ladders

Introduction

Every year a number of persons are injured, some fatally, whilst using ladders on construction sites. Falls and fatal accidents have also involved step ladders and working platforms supported by trestles.

More than half of the accidents occur because ladders are not securely placed and fixed, and of these many happen when the work is of 30 minutes' duration or less. Other causes of accidents include climbing with loads, overreaching or over-balancing, indicating that ladders are used when other equipment could have been more suitable.

The Working at Height Regulations 2005 sets out specific requirements (Schedule 6) for the safe use of ladders when planning and risk assessing work at height. Duty holders (Directors) must consider how to avoid work at height.

If this is not possible, duty holders should take steps to prevent a fall occurring. When they cannot eliminate the risk, they should take steps to minimise the distance and consequences of a fall.

Safe System of Work

The use of ladders and stepladders within the company at present is categorised as:

- Pole Ladders - **only** used as a means of access/egress where the use of stairs or proprietary stair systems is not feasible, they are **NOT** to be used as a working platform
- Step Ladders – In essence the use of Step Ladders is prohibited for all works, in specific circumstances where there is limited space, or the use of another system is not viable, the use of a Step Ladder can be approved by the Directors for a specific task and of short duration. This will require a specific risk assessment and permit to work approved by the Directors.
- Podium Ladders - If there is a specific requirement for the use of ladders due to the nature of the working environment the only ladders to be used will be podium ladders. They will again be subject to a specific risk assessment based on the works to be conducted to demonstrate that no other system can be used.

