

HEALTH & SAFETY

**Safety Code of  
Practice:  
Working at Height**

**US**  
UNIVERSITY  
OF SUSSEX

## **Executive Summary**

A Safety Code of Practice (SCoP) is a university-wide document that supports policies to provide detailed practical information on how to ensure compliance with relevant laws, standards, and regulations, and must be followed by all Faculties and Divisions.

SCoPs are supplemented by associated Guidance documents, which provide additional advice and information on specific topics and are intended to assist in the development of local procedures.

This document is the first in the Safe Management of Hazardous Locations and Hazardous Procedures C400 series of SCoPs and is intended to support managers and teams in drawing up local operational documents.

***Health, Safety & Wellbeing, HR Division***

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## 1. Introduction

Falls from height are one of the main causes of death and major injury at work. The Work at Height Regulations 2005, (amended 2007), aim to protect those working at height where there is a risk of a fall that is liable to cause injury. Where working at height cannot be avoided, a suitable and sufficient risk assessment must be undertaken, with the aim of preventing falls. Where they cannot be prevented, the fall distance and resultant consequences must be minimised. The work must be properly planned, appropriately supervised, and carried out in as safe a way as is reasonably practicable.

## 2. Scope

The work at height Regulations apply to all work at height where there is a risk of a fall that is likely to cause injury. No minimum height is specified in the Regulations; therefore, their application is dependent upon an assessment of the risks, considering the circumstances of the task, and the reasonable practicability of control measures. Activities can include working at height from ladders, stepladders, scaffold towers, mobile elevated working platforms (MEWPs) or in locations from which people could fall, such as roofs, parapets or similar natural locations.

This Safety Code of Practice (SCoP) applies to all work at height activities, carried out anywhere, that are under the control of the University. This includes persons who control work at height activities, including those who plan, commission, authorise, or oversee such work. It covers a range of circumstances such as:

- Design and construction of buildings and other structures
- Using work equipment (a work platform, scaffolding, or a ladder/stepladder)
- Work on a roof or up a tree
- Work next to openings such as cellars or excavations.
- Use of inappropriate means (e.g. standing on a table or chair) to change a light bulb.

## 3. Definitions

**Competent Person** – Someone with the skills, experience, training, knowledge required to undertake the activity safely.

**Duty Holder** – any employer, self-employed person, or other person who controls work at height, including those who plan, organise, manage, supervise, commission, or authorise such work. A duty holder has a legal responsibility to do all that is **reasonably practicable** to ensure that work at height is properly planned and organised; carried out by competent persons; undertaken using suitable work equipment and control measures; and managed so as to prevent, or where this is not reasonably practicable, minimise the risk of falls and falling objects. Within the University, duty holders may include (but are not limited to) senior leaders, line managers, technical managers, principal investigators, project or contract managers, supervisors, and others who exercise control over work at height activities.

**Work at height** – work, research or education, being undertaken/provided in any place a person could fall a distance, including falls into openings, excavations or through fragile surfaces at or below ground level, that that is likely to cause injury, unless preventative action is taken.

## 4. Responsibilities

### 4.1 Executive Deans of Faculty / Directors of Professional Services

- Ensure that arrangements are in place for identifying work at height tasks that may need to be undertaken.
- Ensure that work at height tasks are avoided wherever possible.
- Make sure that risk assessments of work at height tasks, which are unavoidable, are undertaken.
- Put in place mechanisms for sharing the outcomes of such work at height risk assessments with those who need to be aware.
- Make sure suitable work equipment is provided to undertake work at height tasks.
- Ensure equipment remains in a safe, useable condition and is reported for repair or replacement as required.
- Provide training, instruction and supervision to those who are required to undertake work at height activities.
- Ensure that arrangements are put in place to respond to foreseeable accidents and emergencies.
- Make sure those involved in incidents relating to work at height report these via the University's incident reporting system.
- Cooperate with the Estates, Facilities and Commercial Services Division by making sure that all those who may be involved in work at height activities, or who act as duty holder for such activities, are aware of the University's permit to access and permit to work processes.
- Ensure that all those involved in work at height activities, whether carrying out the work or acting as duty holder, follow the permit to work and permit to access processes by emailing the Estates Helpdesk with at least 10 working days' notice of the activity
- Must stop/prevent work at height activities where the requirements of the relevant permit to work or permit to access are not/cannot be met and escalate this through the relevant reporting channel.
- Ensure effective coordination and cooperation between parties, where work at height activities are shared or responsibilities overlap, inclusive of the exchange of relevant risk information.
- Ensure that work at height activities are suspended or modified where the weather or environmental conditions could compromise safety.
- Ensure rescue plans are considered for those working from height where appropriate.

### 4.2 Director of Estates, Facilities and Commercial Services

In addition to the responsibilities of Directors of Professional Services, the Director of Estates, Facilities and Commercial Services is responsible for:

- Ensuring that there is a robust permit to access and permit to work system in place for University projects that involve work at height, and that this is devised and implemented in consultation with stakeholders within Faculties and Divisions.
- Making sure that there is cooperation between EFM, Faculties and Divisions in relation to implementing and following such permit procedures.
- Ensuring that those with duty holder responsibilities within Faculties and Divisions in relation to work at height activities, are aware of how to escalate incidents where the requirements of a permit to access or permit to work are not fulfilled.
- Ensuring that places of work at height such as roof are inspected regularly.
- Ensuring processes are in place for making sure contractors, under the control of Estates, Facilities and Commercial Services, are aware they must undertake risk assessments of any necessary work at height activities and that they follow the University's permit to work and permit to access processes.

### **4.3 Line Managers, Technical Managers and Principal Investigators**

- Undertake any duties delegated to them by the Executive Dean of Faculty or Director of Professional Services Division.
- Plan work at height activities considering potential impacts on the campus and others, implementing suitable controls to prevent incident.
- Vet contractors to ensure they are competent, review risk assessments and method statements for work at height activities and monitor contractor performance during the works.
- Identify tasks that will involve work at height that is unavoidable.
- Carry out work at height risk assessments for these activities.
- Communicate the outcomes of these risk assessments to those who are required to carry out the work at height tasks.
- Provide suitable work equipment for carrying out the risk assessed tasks.
- Make sure such equipment undergoes regular inspection and is taken out of use if identified as damaged.
- Arrange for those involved in work at height tasks to receive training.
- Supervise those involved in work at height tasks through monitoring to ensure arrangements for managing their health and safety are followed.
- Make sure foreseeable emergencies and accidents are planned for, and tested periodically, ensuring that resources and equipment remain stocked for such events.
- Ensure those under their control report any work at height related incidents on the University's incident reporting system.
- Make sure that work at height risk assessments consider the risk of falling objects that may impact others.
- Ensure task specific rescue arrangements are put in place for those working at height.
- Cooperate with the Estates, Facilities and Commercial Services Division by making sure they remain aware of the University's permit to access and permit to work processes, and that they ensure those under their control also remain aware of these processes.
- Ensure that all those under their control, involved in work at height activities, follow the permit to work and permit to access processes.

- Must stop/prevent work at height activities where the requirements of the relevant permit to work or permit to access are not/cannot be met and escalate this through the relevant reporting channel.

#### 4.4 Staff, students, third parties, visitors and contractors

These duties are legal requirements under Regulation 14 of the Work at Height Regulations:

- Follow all controls and arrangements in place for managing the risks presented by work at height tasks they need to undertake, including arrangements relating to permit to access and permit to work where applicable.
- Use equipment provided for work at height activities correctly.
- Co-operate and follow safety instructions and training from those who are responsible for them.
- Report any work at height related incidents, or defects to work at height equipment through appropriate local reporting and escalation channels.
- Contractors carry out their own work at height risk assessments and cooperate with University.

## 5. Requirements

### 5.1 Risk Assessments & Approvals

Faculties and Divisions must ensure that a suitable and sufficient risk assessment is undertaken for all work at height activities that need to be carried out in relation to work, education and research. When doing so, the hierarchy of control, specific to the Work at Height Regulations 2005 must be followed. The hierarchy of control must be followed sequentially. If a step is to be bypassed, this must be clearly justified and recorded in the work at height risk assessment:

- 1) Avoid work at height wherever possible.
- 2) If work at height is unavoidable, a risk assessment must be undertaken, and control measures must be put in place to prevent falls.
- 3) Where the risk of falling cannot be prevented, control measures must be put in place to minimise the distance and consequences of a fall from height.

Faculties and Divisions must ensure that control measures are put in place, and that all work at height risk assessments are approved by the relevant duty holder. In most cases this will be the person responsible for the work activity, work area or permit to work process. Those involved in the activity must also sign the risk assessment to confirm that they have read, understood and agree to follow the risk assessment.

During an emergency or incident, a dynamic risk assessment must be undertaken when assessing any need for work at height. **Safety must not be compromised** and the area made safe, with work paused if controls are unavailable.

Individual's health, fitness and physical capability need to be considered, including any pre-existing medical conditions which may impact a person's safety whilst undertaking work at height activities.

The risk assessment must be reviewed periodically, and if there is a change in the way the activity is undertaken, a change in staffing, a change in the law or best practice, or if an incident occurs.

## **5.2 Physical Controls**

Faculties and Divisions must consider the following physical controls as part of their risk assessment when work at height cannot be avoided:

### **5.2.1 Facilities**

#### **Existing places of work**

Existing places of work must be considered prior to preventative measures through equipment e.g. a flat concrete roof, with existing edge protection.

### **5.2.2 Equipment**

#### **Collective fall prevention**

Collective fall prevention equipment must be considered, as this prevents all those involved in a work at height activity from falling.

#### **Collective fall arrest**

Where falls cannot be prevented, the provision of collective fall arrest equipment must be considered, so that all those involved in a work at height activity are prevented from hitting a lower level, if they were to fall.

#### **Protection of people below from falling objects**

Measures must be put in place to prevent objects falling from places of work at height, to protect people below. This includes, but is not limited to, tethering tools, securing materials and avoiding storage at height.

## **5.3 Management Controls**

Faculties and Divisions must also give consideration to management controls in their work at height risk assessment including:

### **5.3.1 Permit to Work Systems**

For higher risk work at height, such as roof access, a permit to work process must be obtained, where people carrying out the task are given signed off permission to carry out the task for a designated period of time. Once the time elapses, a new permit to work must be issued. The process must be documented and must be written in consultation with the Estates, Facilities and Commercial Services Division. The permit to work must be signed off by the relevant duty holder.

### **5.3.2 Planning**

The Faculty or Division's work at height risk assessment must assess what planning arrangements need to be in place for the work at height activity. Depending on the level of risk presented, this must include pre-task planning, how the task will be carried out, how and what equipment must be selected and a rescue plan for helping those who may get into difficulty whilst working from height. Planning must also take into account safe access and egress from any place of work at height, including during emergency and rescue situations. Danger areas and exclusion zones must also be considered in order to prevent unauthorised

access to work at height locations and equipment. Weather conditions (wind, rain, ice, heat) and environmental factors affecting stability or visibility must also be considered.

### **5.3.3 Selection of suitable equipment**

Consideration must be given to the correct type of equipment required for the task and work equipment must meet the relevant requirements set out in Schedules 1-6 of the Work at Height Regulations.

Whilst stepladders and ladders are allowed for low-risk, short duration tasks and/or for access where reasonably practicable, they are a last resort and must not be used where it is reasonably practicable to use safer collective measures.

#### Stepladders

Stepladders must be considered where work at height is unavoidable, but the risk assessment identifies that the task is low risk and of short duration. Where this is the case, Faculties and Divisions must make sure that stepladders are purchased from a reputable retailer and are of EN131 Trade Standard.

#### Leaning Ladders

Leaning ladders must be considered where work at height is unavoidable, but the risk assessment identifies that the task is low risk and of short duration. Where this is the case, Faculties and Divisions must make sure that stepladders are purchased from a reputable retailer and are of EN131 Trade Standard.

#### Footstools/Kick stools

Footstools/Kick stools must be considered in the Faculty or Division's risk assessment, particularly where the task cannot be carried out from floor level, but a stepladder or leaning ladder is not suitable. Footstools/Kick stools must be purchased from a reputable retailer.

#### Other equipment

The work at height risk assessment must also consider other access equipment from reputable retailers.

### **5.3.4 Inspection and maintenance**

Any work equipment provided for work at height purposes must be included in a work at height register of equipment, be subject to pre-use checks and regular formal inspection (annually as a minimum), undertaken with oversight from the duty holder. Maintenance must be carried out in line with the manufacturer's guidance and records of inspection maintained. Damaged or faulty equipment must be taken out of use for repair or disposal and secured to prevent use with 'do not use' signage as appropriate. Inspections must also be carried out following exceptional circumstances that affect the safety of the work at height activity.

Places of work at height must be inspected before first use and after events likely to affect safety (e.g. severe weather), undertaken with oversight from the duty holder.

Storage of equipment in relation to work at height must be considered, to ensure it does not become damaged, for example due to inappropriate storage or it becoming weathered.

Where it is necessary to hire work at height equipment, this must be done through reputable suppliers. Hired equipment must be subject to the same inspection processes as University owned equipment. Maintenance issues will usually be addressed by the supplier, but defects must be notified to the supplier and items taken out of use immediately.

### **5.3.5 Fragile surfaces**

Fragile surfaces must be considered as part of the work at height risk assessment, with the aim of making these secure, to prevent those involved in the work at height activity from falling through. Consider the use of platforms, coverings, guardrails, warning notices and fall arrest systems if a residual risk remains.

### **5.3.6 Training, supervision and competence**

All those involved in work at height activities must be trained, provided with information, and supervised to ensure they understand and agree to follow the arrangements to protect them. This is inclusive of all the controls and procedures in place, how to use any equipment that needs to be used, how to inspect work at height equipment and what to do if there are any faults with such equipment, or they don't understand the arrangements in place.

Faculties and Divisions must put arrangements in place to monitor competence in following the measures that have been put in place, and to address gaps in competence as these arise.

## **5.4 Personal Protective Equipment (PPE)**

### **5.4.1 Personal fall protection**

Personal fall protection that either prevents an individual falling, or stops them falling to a lower level, must be considered last. This is because it only protects the individual.

## **6. Emergency Arrangements**

### **6.1 Emergency Planning & Preparation**

Faculties and Divisions must consider any foreseeable emergencies that could occur because of working at height. They must make sure that these emergencies are planned and documented in their rescue plans and that resource is provided to be able to respond to such an emergency.

The emergency rescue plan must be tested periodically to ensure that those with roles under it remain aware of what to do.

### **6.2 Emergency Response & First Aid**

Faculties and Divisions must consider foreseeable first aid incidents that may arise from the work at height tasks being carried out. They must decide whether the existing university first aid provision in terms of Local First Aiders and first aid equipment are sufficient to respond to such an incident.

Where additional resource is, or may be, required, Faculties and Divisions must carry out a first aid needs assessment to identify what additional personnel and equipment are required.

### **6.3 Reporting Incidents & Accidents**

Faculties and Divisions must ensure that any incidents, accidents or near misses that occur in relation to a working at height activity are reported on the University's incident reporting system.

Faculties and Divisions must ensure that when an incident, accident or near miss occurs, this is followed up with those concerned to make sure they are recovering and if anything can be done to prevent or reduce the likelihood of a repeat incident.

Where the Health, Safety and Wellbeing Team may need to carry out an investigation, for example if an accident or dangerous occurrence needs to be reported to the Health and Safety Executive (HSE), Faculties and Divisions must support this process.

## **7. Transport**

This section is not relevant to the scope of this document.

## **8. Monitoring & Assurance**

Faculties and Divisions must implement local arrangements for ensuring that control measures from working at height risk assessments are implemented and followed.

The Health, Safety and Wellbeing Team will monitor the implementation of this SCoP through inspection, audit and the review of reported incidents.

## **9. Records & Retention Requirements**

Working at height risk assessments must be retained for 5 years once they have been superseded by an updated version.

Any formal procedures relating to working at height, such as method statements and rescue plans, must be retained for 10 years once superseded by an updated version.

Inspection records and audits relating to work at height must be retained for 10 years following completion of any actions that were identified.

## **10. Further Information / Guidance**

- To follow.

## **11. Legislation & Standards**

- [Work at Height Regulations 2005](#)
- [HSE Working at Height: A Brief Guide \(INDG401 rev2\)](#)

## **12. References**

- [Working at Height webpage](#)

### 13. Appendices

This section is not relevant to the scope of this document.

### 14. Document Control

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