

Work at Height Policy

1. Overview and Purpose

1.1 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 liable to cause injury. Where working at height cannot be avoided, a suitable and sufficient risk assessment must be undertaken. The work must be properly planned, appropriately supervised, and carried out in as safe a way as is reasonably practicable.

2. Scope

2.1 The Work at Height Regulations apply to all work at height where there is a risk of a fall liable to cause injury. No minimum height is specified in the regulation therefore its application is dependent upon assessment of the risks under the circumstances of the task and the reasonable practicability of control measures. Activities include working at height off ladders, stepladders, scaffold towers, mobile elevated working platforms or in locations from which people could fall, such as roofs, parapets or similar natural locations.

2.2 This policy applies to all work under the control of the University, indoor and outside and covers a range of circumstances, for example:

- 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, (standing on a table or chair), to change a light bulb.

2.3 Working at height in an office, or similar low risk environment, such as accessing top shelves, can be addressed through the general risk assessment process, where an office risk assessment can be adapted for use. Please see Guidance for Risk Assessment.

2.4 The Work at Height Regulations are relevant to all work at height activities carried out on the campus of the University of Sussex. The Policy also applies to all activities managed by the University at any off-campus properties and locations.

3. Responsibilities

3.1 The Director of Estates, Facilities and Commercial Services is responsible for the implementation of this Policy, insofar as it relates to the activities and equipment associated

Document Control					
Document No	HP032	Version	1.0	Date Issued	27/02/2023
Author	Dermot Barry	Reviewed by	Seimon Barton-Jones	Department	Health & Safety

with the Estates and Facilities' Department and for its communication to its staff as appropriate.

- 3.2 Heads of Departments and Schools are responsible for the implementation of this Policy within their respective Departments and Schools insofar as it relates to the activities and equipment within their own Department or School and for its communication to their staff and students as appropriate. Where work at height is carried out by staff or contractors then the prime responsibility for the safety of the work resides with the Department or School who employs the staff or engages the contractor. All staff and students within Departments and Schools must comply with this Policy and the associated arrangements, instructions and the University of Sussex's Work at Height Guidance (HS G070). Heads of Department are responsible for maintaining an inventory for all work at height equipment.
- 3.3 The Head of Health and Safety is responsible for advising on the standards and regulations that must be achieved to meet legal requirements; for keeping the University's Health and Safety website up to date with the related policy documents, linking such pages to any relevant arrangements, instructions and guidance; and undertaking assurance activities on behalf of the University that ensures compliance with this Policy.
- 3.4 All employees have a responsibility to comply with this Policy and any actions arising from its implementation. Should employees become aware that any work at height hazard is not covered by a risk assessment, they must report it to their Manager or Supervisor. They should also take steps to minimise the risk themselves.

4. Policy

- 4.1 This Policy document is not intended as a substitute for The Work at Height Regulations 2005 but as an introduction to them. Those who manage or undertake work at height for or on behalf of the University of Sussex must do so in accordance with this Policy. This Policy is incorporated under the University's Health and Safety Policy and in accordance with The Work at Height Regulation 2005.
- 4.2 The Work at Height Regulations 2005 set out a hierarchy for managing the risks of working at height to which the University of Sussex will comply. This hierarchy is:
- Avoid work at height if at all possible,
 - If work at height is unavoidable, control measures must be put into place to prevent falls.
 - Where the risk of falling cannot be prevented, control measures must be put into place to minimise the distances and consequences of a fall.
- 4.3 The University of Sussex will take all reasonably practicable measures to ensure all workplaces under their control are safe without unnecessary risk from working at height to any person needing to access them or are affected by such work.

Document Control					
Document No	HP032	Version	1.0	Date Issued	27/02/2023
Author	Dermot Barry	Reviewed by	Seimon Barton-Jones	Department	Health & Safety

4.4 Compliance with this Policy and the associated Work at Height Guidance is mandatory for all employees, contractors, self-employed persons and visitors who manage or undertake work at height. Work at height is defined as work in any place a person could fall a distance liable to cause injury unless preventative action is taken. This could be above or below ground or floor level.

4.5 Core Principles:

- All work at height must be properly planned and organised, and a risk assessment must be carried out before the work is commenced: reference must be made to the University’s Work at Height Guidance document (HS G0 70).
- Suitable control measures must be put in place to ensure safety, including the use of a Permit to Work (PTW) where it is deemed necessary. A PTW must be used for all work involving roof work, tower scaffolds, scaffolding, rope access techniques or Mobile Elevated Work Platforms (MEWPs) and must be considered for ladder usage where risk assessments deem it appropriate. A PTW would not be usually required where it has been identified that use of stepladders, podium steps, hop-up platforms, or use of kick stools, (or similar), are required for working at height that is of low risk and short duration of use.
- Ladders can only be used for work at height when a risk assessment has shown that using equipment offering a higher level of fall protection is not justified because of the low risk and short duration of use; or there are existing workplace features which cannot be altered.
- Measures must be taken to ensure not only the safety of those working at height, but also to ensure the safety of those who might be impacted by the work at height, for example, passers-by and those working adjacent to or beneath any work at height activity.
- Those individuals involved in work at height must be competent, (including any specialist training where required), and must receive an appropriate level of supervision for the work. The level of competence and supervision required is dependent on the risk associated with the work.
- Equipment used for work at height must be registered in an inventory and must be properly inspected and maintained, and records kept of all such maintenance and inspection work. Some items will require statutory inspections, and the Estates and Facilities Department must be informed of the existence of all equipment used for work at height so that the necessary arrangements can be made for such statutory inspections.
- When not in use, all equipment must be kept secure so that it cannot be used by any unauthorised individuals or persons.
- Contractors must provide their own work at height equipment for the tasks they undertake and are not permitted to use University owned or managed equipment.
- Access to roof spaces and roof areas is controlled under a separate policy on Permits to Work.

5. Legislation and Good Practice

5.1 This Policy must be read in conjunction with the University of Sussex’s Work at Height Guidance which can be accessed here:
 Work at Height Guidance – (HS G070)

Document Control					
Document No	HP032	Version	1.0	Date Issued	27/02/2023
Author	Dermot Barry	Reviewed by	Seimon Barton-Jones	Department	Health & Safety

<https://www.sussex.ac.uk/hso/documents/hs-g070-work-at-height-guidance-final.docx>

- 5.2 A copy of the Work at Height Regulations 2005 can be accessed here:
[The Work at Height Regulations 2005 \(legislation.gov.uk\)](https://www.legislation.gov.uk)
- 5.3 The Health & Safety Executive's (HSE) website provides more advice, guidance, and answers to frequently asked questions.
 Find out more at:
<http://www.hse.gov.uk/work-at-height/faqs.htm>
- 5.4 *Safe use of ladders and stepladders - A brief guide*, Ladder Association, LA455 (formerly INDG455); [LA455 - The Ladder Association](#)
- 5.5 The Ladder Association Code of Practice 2021:
[Ladder-Association-Code-of-Practice-Version-2-Rev-0-0721.pdf \(ladderassociation.org.uk\)](#)
- 5.6 *Health and Safety in roof work* HSG33 (Fourth edition)
 HSE Books 2012 ISBN 978 0 7176 6527 3:
<http://www.hse.gov.uk/pubns/priced/hsg33.pdf>
- 5.7 *Fragile roofs: Safe working practices* General Information Sheet GEIS5 HSE Books 2012:
<http://www.hse.gov.uk/pubns/geis5.pdf>
- 5.8 Further information about CDM and design requirements can be found at:
<http://www.hse.gov.uk/pubns/books/l153.htm>

Review / Contacts / References	
Policy title:	Work at Height Policy
Date approved:	24 th February 2023
Approving body:	University Health and Safety Committee
Last review date:	Not applicable – New Policy
Revision history:	V 1.0
Next review date:	
Related internal policies, procedures, guidance:	University of Sussex – Work at Height Guidance (HS G070) Health and Safety website The Ladder Association
Policy owner:	Health & Safety
Lead contact/author:	Head of Health and Safety

Document Control					
Document No	HP032	Version	1.0	Date Issued	27/02/2023
Author	Dermot Barry	Reviewed by	Seimon Barton-Jones	Department	Health & Safety