

August 2004

Working at Heights Workshop

This workshop, held on 23rd June at the Avoncroft Museum of Historic Buildings, was one of our most successful ever. It was attended by 90 delegates from firms all over UK, as far apart as London and Liverpool!

The event was launched by a keynote introduction from [Ray Cooke, Principal Inspector, Construction Group](#), who outlined the source of the new Regulations covering temporary work at heights and their aim to provide a single set of requirements for all industries. He went on to say that they were desperately needed because falls are the largest cause of fatalities in the working environment. Sadly, he added, most of them could have been prevented if only the right equipment had been provided and used.



Essentially, Ray said, the new Regulations covered falls from height, but not on the same level, and did not change the present situation in terms of their objective. There is a major problem, Ray said, with the myth that falls only need dealing with if they occur from above 2 metres – this is not so. What they did emphasise, however, was the methodology for achieving compliance with a risk based approach. He then displayed a series of slides to illustrate modern equipment and techniques to control the risks, to contrast with some rather hazardous examples of hoe “not to” work at heights! The Golden Rule, of course, is “if you don’t have to work at heights – then don’t!”

Ray then went on to address the key area of working with ladders, which resulted in about 12 fatalities each year, many major injuries and which was a special target for HSE. He emphasized that there was not going to be a ban on the use of ladders but the new Regulations would certainly challenge the automatic use of them instead of safer methods. He then described the various HSE initiatives to bring about a change in practice for working at heights, supported by an enforcement strategy with an appropriate ‘lead-in’ period.

Ray concluded by saying that prevention of falls was not difficult, but it was essential to ensure that all work is planned, a robust risk assessment approach was in place and that all individuals were adequately trained and supervised.

The next presentation was by **Brian Duncley of Balfour Beatty Rail Technologies** who picked up where Ray Cooke had left off, on the subject of practical Risk Assessment issues. He described the Risk Assessment Hierarchy to AVOID the

Risk, PREVENT falls and MITIGATE the consequences by adopting collective protective measures. He then focused on the significant key topics in working at heights, namely: -

- Existing structures
- Scaffolding
- Mast Work Platforms
- Cradles
- Mobile Work Elevating Platforms (MEWPs)
- Alloy Towers
- Ladders
- Collective Protection
- Personal Protection
- Abseiling Techniques

In all of these areas, Brian gave a comprehensive insight into the issues that must be addressed in doing a “suitable and sufficient” risk assessment. These include basic facts about suitability of equipment design, its stability, duration of use, the weather conditions, training of staff and effectiveness of inspection and maintenance systems. Brian had no difficulty, it seems, in finding the examples of malpractices with which he sprinkled his talk!

When he addressed the topic of ladders and stepladders, he reiterated what Ray Cooke had said about the need to challenge the automatic use of ladders. He emphasised the need to ensure the use of industrial standard ladders and to keep an accurate register of ladders to support an effective system of inspection and maintenance.

Brian then gave a useful series of examples of work operations in different industries that would have to be reviewed under the new Regulations because past practices may not be suitable. He concluded by saying that the new guidance included some helpful case studies in various industries, which would help to change existing approaches.

The view from the Facilities Management Sector was presented by the next speaker, who was **Alison Hartland, Regional Safety Advisor with Interserve FM**. In her introductory remarks about the imminent changes, Alison referred to the demise of the ‘old 2m rule’ and emphasised the reason for this with a report of a maintenance fitter who lost his footing on the second rung of a ladder and was killed when his head hit the floor as he fell backwards. She went on to say that the risk from falls did not just occur above ground level – they could equally happen into cellars, trenches or excavations, down manholes or lift shafts!

Alison then went on to explain the range of contracts undertaken by her firm, in which falls from height presented significant risks. Protecting people from these risks was also made more complex because of the way their services were provided to clients through a network of other Interserve Divisions, Selected Partners or sub-contractors via the tender process. This illustrated another aspect of the problem –

making sure that the risk control measures could be adequately controlled ‘at a distance’! Like Brian, she was able to provide, sadly, ready examples of how people ‘got it wrong’!

The important question here, she stressed, was “How competent are your sub-contractors?” Of necessity, many works are undertaken out-of-hours, with the inevitable risk that standards of supervision may lapse. “Don’t be afraid”, Alison added, “to visit them and take a look at their working methods”. It was vital to check that they were working to the method statement they provided you with in the tender stages! Other elements that needed checking were insurance certificates for Public Liability and Employer’s Liability – and make sure they are current. Don’t rely on the fact they were insured in previous years. Other important information is their Safety Policy Statement, site-specific risk assessments and method statements, copies of training records for nominated staff and company accident histories. Also check on the HSE website for any prosecutions! Finally – agree written levels of supervision in writing and ensure that emergency procedures exist.

Regarding the sensitive matter of ladder use in window cleaning, Alison said there is no longer a need for double or triple extension ladders. Interserve FM manages many multi-storied buildings and, wherever possible, does not permit the use of ladders. Instead they use pole systems that can clean up to the 4th or 5th floor. Failing that, cradles or abseiling can be used. Ladders may be used only after risk assessment has shown that other equipment is not justified because of low risk, or the work is of short duration, or that existing features on site cannot be altered. When they are used, they must protrude sufficiently above a place of landing. Another important consideration is users always have a secure handhold, especially when carrying a load! Alison then went on to discuss the use and abuse of stepladders, which are a common item of kit in facilities management. She emphasised the need to inspect them before use, to always open them fully, to select the right size for the job and never stand on the platform.

In terms of corporate-wide implications, it is necessary to address working at heights as a specific issue in the safety policy. Risk assessments must be produced and managers and supervisors must be educated to adopt a more proactive approach to working at heights. Employees must be trained in to the new methods, the use of new equipment and, importantly, when the use of a ladder is unsuitable. It may be necessary to purchase or hire more access equipment, or even sub-contract certain tasks.

A key measure is the planning of work in a more logical manner. For instance, it may be safer to programme different types of work together, in order to reduce the frequency of access to high positions. Similarly, scheduled bulk changing of lights using life-cycle data from suppliers can reduce the number of operation at heights. Alternatively, looking at new buildings, installation of equipment that can be lowered for maintenance will be an improvement and has long been a requirement of the CDM Regulations.

In conclusion, Alison said that, after construction workers, maintenance workers and window cleaners were most at risk from falls. Undoubtedly there will be cost implications for all businesses in terms of physical alterations, equipment and training. It will take time to overcome a sometimes casual attitude to recognising the degree of risk and it will take a major effort to change behaviour.

The particular demands of Emergency Works at Height were addressed by the next presenters, **Mick Webb of South Staffordshire Housing Association and Tony Hall of AWG Facilities Services Ltd.** Immediately they were drawn into the need to define “**Emergency**”, “**Height**” and “**Out-of-Hours**”. All of these have a crucial bearing on standards of risk assessment and the implementation of suitable control measures. For instance, work defined as non-emergency may be deferred until more suitable resources are available in normal hours and a risk is thereby eliminated. By the same token, if a temporary repair can be done, the amount of high risk work under emergency conditions, outside normal hours, is reduced. Examples of this approach were quoted for a roof leak, hanging debris and upper floor glazing.

On the subject of what constitutes “height”, Mick made the point it is really “any distance that is likely to cause personal injury” and, hence, demonstrated the fallacy of paying undue attention to the old criterion of falls from 2 metres or more. Similarly, Mick said that the HASAWA still applied “out-of-hours” and so it was vital to organise properly to maintain the same high standards of safety! This meant, for example, providing portable lighting to cope with poor light and access to suitable equipment.

In addressing the suitability of risk assessment, Mick mentioned the importance of following hierarchy of risk control measures. He discussed advantages of a system of generic risk assessments supported by appropriate ‘fine-tuning’ on site to produce specific safe working methods. This requires tradesmen to be trained in risk assessment, particularly with regard to allowing for the current weather or unexpected environmental conditions.

Regarding the suitability of risk control measures, it was likely that two persons would be needed to apply them, special equipment would be needed and lighting would be necessary. As an illustration of this, he quoted the repair of a damaged ball valve in a loft.

Tony Hall continued the presentation by describing the work profile carried out by his firm, AWG Facilities Services on the housing stock of Birmingham City Council. This comprised some 20,000 jobs per month on 55,000 properties, of which 1,750 were out of hours to do repairs like removal of hanging slates/tiles, isolation of water penetration, securing property, restoring electricity supplies, making forced entries and a whole lot more, too numerous to list here!

Tony went on to show a number of situations where access was needed over obstructions to the faces of shops, houses and even streetlamp columns, which made detailed pre-planning an uncertain art! He then focussed on the specific problem of