

# Working at Height Procedure

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## 1 Introduction

Mervyn Lambert Plant Ltd cares about the health and safety of its people and accepts its responsibility to do all that is reasonably practicable to ensure that working at height is both safe and operates within current legislative requirements.

This document outlines the Mervyn Lambert Plant Ltd policy relating to requirements imposed by the Health and Safety at Work Act etc. 1974. The Working at Height Regulations 2005. The Management of Health and Safety at Work Regs 2003 reinforces this requirement, the Provision and Use of Work Equipment Regulations 1998 the Construction (Health Safety and Welfare) Regulations 1996 and the Workplace (Health, Safety and Welfare) Regs 1992.

## 2 Scope

Working at height is a necessary requirement of many disciplines within Mervyn Lambert Plant Ltd. The risk of a fall during these activities must be controlled. Falls from height are the cause of a significant number of all reported major injuries and half of the fatal injuries to construction workers. Additionally it is the most common cause of fatal accidents to employees in the UK.

This Policy outlines procedures and plans to remove or reduce risk to Mervyn Lambert Plant Ltd people who work at height as part of their normal operational duties. It details arrangements for identifying and managing risks from working at height.

## 3 Policy

Elimination of risk is the key factor in all work activities and Mervyn Lambert Plant Ltd Policy reflects our customer's standards and safe systems of work.

From the outset fall prevention is the primary goal. Working methods will take full account of this by ensuring adequate Risk Assessment. Where elimination of risk cannot be achieved, fall prevention or as a last resort, fall arrest systems will be employed. Suitable equipment and appropriate levels of information instruction, training and supervision will be given to all employees who work at height.

## 4 Responsibilities

**The Managing Director** is responsible for making the necessary arrangements to provide financial support to provisions of working at height for various activities

**The Health & Safety Manager** will ensure that this Policy and Procedure is appropriately communicated, understood and implemented. This will be achieved by regular audits and inspections.

**Managers** will be responsible for the completion and documentation of suitable risk assessment prior to work commencing. They will ensure that levels of competency are maintained within their teams and that equipment to be used is fit for purpose and well maintained and an appropriate inspection regime is in place.

**Supervisors** will ensure the correct implementation of safe systems of work and that personnel are using the systems provided correctly. Any safety issues relating to the task will be escalated appropriately.

**Operatives** who carry out the work must be medically fit, use systems and equipment provided correctly and report any loss or defects to supervisors and managers. Any additional risks associated to the task must also be reported and actioned.

## 5 Policy Objectives

Before considering any work at height, a task specific risk assessment must demonstrate that there is no safer way of completing the task. All work at height must be:

- Avoided whenever possible.
- Assessed for risk to the standard as far as is reasonably practicable.
- Properly planned
- Adequately supervised
- Through the implementation of an appropriate safe system of work ensure the safety of all people who may be exposed to risk.
- Undertaken by competent people who have been suitably trained, equipped and instructed in using the appropriate Mervyn Lambert Plant Ltd work procedures.
- Ensure the safety of those affected by activities arising from working at height.

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## 6 Risk Assessment

The Health and Safety at Work etc, Act 1974 and supporting Regulations impose a duty on employers to carry out suitable and sufficient assessment of risk to which employees and people who may be affected by their activities are exposed. With the assistance of the H&S Manager it is the responsibility of each Manager/Supervisor to complete task assessments for all work activities their people carry out. This includes activities involving working at height. Completed assessments must be retained locally.

Common risks associated with Mervyn Lambert Plant Ltd activities while working at height are as follows:

- Falls from unguarded or unprotected edges
- Use of fixed ladders accessing plant equipment
- Use of ladders and steps for access
- Use access platforms, fixed and temporary scaffolding or mobile elevated work platforms
- Reflection and glare
- Slips trips and falls
- Manual handling
- Falling debris, tools and equipment
- Adverse weather conditions
- Misuse of personal protective equipment
- Working alone at height
- Other external environmental influences.

## 7 Arrangements

Compliance with the following arrangements will ensure the achievement of the Mervyn Lambert Plant Ltd policy objectives above.

### 7.1 Working at Height

Ladders should only be used for access, egress and short duration inspection work, (Maximum of 15 - 30 minutes work at a single position before it is moved).

Before any roof work commences the roof risk assessment must be consulted. In addition a task specific risk assessment must be completed. This must consider all hazards including:

Electrical, working above or near water, inclement weather, and high winds.

Working on roofs with unguarded or unprotected edges within two meters of the edge of the roof requires specific training. People carrying out this type of work must be competent and have suitable equipment to carry out the task. When selecting work equipment for access to and egress from working at height consideration should be given to:

- Frequency of use
- The height to be negotiated
- The duration of the use

Work equipment will not be selected for access to or egress from work at heights unless it allows for evacuation in the event of imminent danger, taking into consideration the number of people using the access/egress and the height to be descended.

### 7.2 Fall Prevention and Fall Arrest Equipment

As stated previously fall prevention must be the first consideration in all aspects of working at height. If due to specific requirements this is not possible, the use of fall arrest systems must form part of the risk assessment.

Fall prevention equipment must:

- Be issued as Personal Protective Equipment (PPE).
- Be of suitable strength and safety to arrest the fall of any person
- Securely attached to a structure or plant by means of a suitable attachment. The structure, plant and attachment must be of sufficient strength and stability for the purposes of supporting that equipment and any person liable to fall with a factor of safety.
- In the event of a fall by any person the equipment should not, as far as possible lead to any further danger.
- Suitable and sufficient means of rescue after a fall is to be provided.
- Be visually inspected by the user prior to use.
- Be fully inspected subject to frequency of use.

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It is the responsibility of the user to ensure that pre and post use checks of all PPE are carried out and that any defects are reported. In addition to this, the Manager must ensure that a Competent Person inspects harnesses and fall arrest equipment issued to their people on a six monthly basis and that it is recorded. Any repairs or replacement to kit recommended by the competent person must be completed prior to next use.

### 7.3 Competent Persons

A competent person is one trained in the inspection, use and maintenance of the equipment with the necessary practical, theoretical knowledge, and other attributes, ability to recognise any defects and understand their significance in the prevention of danger during work.

### 7.4 Inspection of Access Equipment

All inspection reports must be endorsed with the appropriate access equipment's unique identification number. Formal inspections shall be undertaken at regular intervals not to exceed the following:

Safety Harnesses and associated equipment – 6 months

All other equipment e.g. ladders platforms – 12 months

All equipment must be inspected at the prescribed time and the results must be recorded on an inspection report form as shown in **Appendix A** for ladders, steps and portable work platforms

Equipment purchased henceforth must be tested strictly in accordance with manufacturer instructions. The Manager/Supervisor must be informed when new access equipment is purchased for addition to the local asset register and future testing.

### Safety Harnesses / Lanyards should be replaced every 5 years

It is the responsibility of the Manager/Supervisor to ensure that inspection and certification are made in a timely manner.

All inspection records will be kept for three years where the equipment is used.

**Appendix B** is to be used to record the formal inspections

Equipment found to be faulty must be withdrawn from use immediately and marked appropriately. Where repairs are necessary these must be completed and re-inspected before returned to use. Equipment that cannot be repaired must be destroyed and the inspection records endorsed.

### 7.5 Use of Mobile Equipment

Cherry Pickers and Mobile Elevated Work Platforms (MEWPs).

Confirmation of testing and certification of the equipment when it is on hire is the responsibility of Mervyn Lambert Plant Ltd.

Mervyn Lambert Plant Ltd operatives must receive training (IPAF) covering safe operation of this equipment.

### 7.6 Use of Fixed and Temporary Scaffold Towers

All scaffolding systems are safe and effective work platforms that offer a safe place from which Mervyn Lambert Plant Ltd people can operate. A competent person (e.g. PASMA qualified) must carry out erection, alterations and inspection of this type of access equipment. Regular inspection of scaffolding by a competent person is a statutory requirement and a log of inspection findings and remedial actions must be maintained. Mervyn Lambert Plant Ltd operatives must receive training covering inspection and safe use of this equipment where applicable.

All component parts of Scaffold Towers should be marked with a unique number, this is to reduce the risk of borrowing / mixing component parts.

### 7.7 Use of Ladders

Ladders are not to be used as a long term working platform. Where ladders are in use they must be securely tied at the top or footed prior to use. The feet of a portable ladder shall be prevented from slipping during use by securing the stiles at or near the upper or lower ends by an anti slip device or any other arrangement of equivalent effectiveness.

### 7.8 Stepladders

The use of Stepladders is permitted provided that a suitable Risk Assessment is carried out prior to work commencing. Careful consideration on the selection and use of stepladders must be given in context to the task being carried out.

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Mervyn Lambert Plant Ltd operatives must receive training covering safe operation of this equipment.

### 8 Falling Objects

Suitable provision must be made to prevent people, equipment, material or other items from falling. On roofs fixed guarding or temporary edge protection must be provided wherever possible at any place where a person might fall.

No material or object shall be thrown or tipped from height where it is liable to cause injury.

Materials and equipment must be stored in such a way as to prevent risk to any person from the collapse, overturning or unintentional movement of the materials or equipment.

### 9 Working Alone

During periods of working alone it is essential that your Manager/Supervisor know where you are working.

### 10 Personal Protective Equipment (PPE)

PPE is only issued and used as a last resort when other means to protect are not suitable or available. All PPE must have a British Standard kite mark or the European CE marking to demonstrate compliance to accepted standards. Purchasing from an approved supplier should ensure this standard. Wearing hard hats while working at height is a mandatory requirement. Protective footwear that has a well defined heel and instep is recommended. Provision of all PPE is subject to risk assessment.

### 11 Training

All requests for training must be made via the normal agreed method. Competent preferred suppliers will deliver approved training in a timely and cost effective way. On completion of training records will be updated and training details will be added to personnel files.

Persons undergoing training **must** be supervised by a competent person.

### 12 References

Working at Height Regulations 2005

Management of Health and Safety at Work Regulations 1999

Personal Protective Equipment at work Regulations 1992

Mervyn Lambert Plant Ltd PPE Policy

The Provision and Use of Work Equipment Regulations 1998

The Workplace Health, Safety and Welfare Regulations 1992

The Construction (Design & Management) Regulations 2007

The Lifting Operations and Lifting Equipment Regulations 1998

HS(G)19 Safety in Working with Power Operated Mobile Platforms

### 13 Enquiries

For additional information regarding this document contact the H&S Manager.

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**Appendix A**  
**Record of Annual Inspection of Ladders, Steps and Portable Work Platforms.**

Certificate No

Owner of Equipment  Location

Type of Equipment  Serial Number

Manufacturer

Details of any defects

Observations

Date of Inspection  Date of next Inspection

**Details of Test (Portable Work Platforms Only)**

SWL  Test Load Applied  Proof Load \* Applied

Details of Test and Equipment Used.

Declaration I hereby declare that the equipment described in this record was Inspected/Tested under the Work Equipment Regulations 1998.  
and was found to be free from any defect likely to affect safety on / / and that the above particulars are correct.

Signature ..... Date record is made .....

Name and Address of person authenticating the record.

Name..... Address.....  
.....

*\* If applicable.*

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**Appendix B**  
**Record of Thorough Inspection of Lanyard and Safety Harness**

**NOTE** A separate Inspection Record is required for Harness and Lanyard

Certificate No

Owner of Equipment

Contact Details

Type of Equipment  Number

Manufacturer

Details of any defects

Observations

Date of Inspection  Date of next Inspection

Details of Test and Equipment Used.

Declaration I hereby declare that the equipment described in this record was Inspected/Tested under the Work Equipment Regulations 1998.  
and was found to be free from any defect likely to affect safety on / / and that the above particulars are correct.

Signature ..... Print .....Date record is made .....

Name, Address & Contact details of person authenticating the record.

Name..... Address.....

.....

Contact Details.....

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**Appendix C**  
**Safety Features of Aluminium Towers – MLP-HSG-011**

- ☐ All the components must be in good condition, work correctly and be compatible. Checks should be made for cracks, broken welds, crushed or bruised tubing or any other damage.
- ☐ Mobile towers should only be erected on firm and level ground and with the castors locked.
- ☐ The maximum height of a mobile tower should be no more than three times the minimum width when used outside. This can increase to three-and-a-half times, inside. **However, the manufacturer's recommendations should be followed.**
- ☐ Outriggers or stabilisers may be used to gain extra height, but within the limitations of the manufacturer's recommendations.
- ☐ Double guardrails and toeboards must be fitted as with normal scaffold.
- ☐ Before climbing the tower any movement must be prevented by locking the wheels.
- ☐ Any outriggers or stabilisers must be securely fastened and braced, steps or ladders should not be placed on the platform to gain extra height.
- ☐ Towers should only be moved by pushing at the base and there should be no personnel or materials on the platform. When moving towers they must be dismantled to a platform level of 2.5 times the effective least base dimension. Care should be taken that there are no overhead obstructions or power lines.
- ☐ Adequate means of access to the working platform should be provided. This may be in the shape of angled steps, an inclined ladder within the tower, a vertical ladder attached to the narrow side or a built-in vertical ladder integral within a frame section. Climbing the outside cross supports or bracing sections is not permitted.
- ☐ There should be a platform provided at distances not exceeding 4 metres.
- ☐ The recommended SW load should never be exceeded.
- ☐ If a mobile tower is left erected in the same place in excess of seven days, then an inspection and report must be undertaken, similar to the requirements for scaffolding.

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