

WORK AT HEIGHT			
Policy ✓	Code of Practice ...	Guidance ...	Procedure ...
Organisation Wide ✓		Local ...	
Approved by the University Health and Safety Committee			
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1. Introduction

'Work at height' means work in any place where, if there were no precautions in place, a person could fall a distance liable to cause personal injury (for example a fall through a fragile roof). Previously "work at height" was defined as 2m or more above the ground, however this was removed from the Work at Height Regulations 2005 and now any work "above ground" may be considered as work at height.

This Policy with the requirements of the Health and Safety at Work Act 1974, and other legislation, such as:

- The Management of Health and Safety at work Regulations 1999.
- The Work at Height Regulations 2005.
- The Lifting Operations and Lifting Equipment Regulations 1998.
- The Provision and Use of Work Equipment Regulations 1998.

This policy reflects the commitment of the university to meeting the requirements of the Work at Height Regulations 2005 by ensuring that work at height is properly planned appropriately, supervised and carried out in a manner which is so far as is reasonably practicable, safe. It recognises that falls from height are a significant cause of workplace fatalities and major injuries. Those planning to undertake Work at Height activities on behalf of the university must consider the risks associated with the work and ensure control measures are in place to manage these risks including the selection of work equipment based on the hierarchy of controls. Where possible work should be completed from the ground.

The objectives of this policy are to ensure, so far as is reasonably practicable:

- That those with duties under this procedure are identified and are provided with clearly defined roles and responsibilities
- Work at height activities are avoided where possible.
- That those responsible undertake a suitable risk assessment for all work at height for tasks and activities undertaken on behalf of the university
- That equipment is suitable for its intended use and part of all necessary inspection and maintenance programmes.
- That all persons who are undertaking work at height duties are trained and competent to do so.

2. Scope

This policy applies to all Brunel University of London activities where Work at Height risks exist, including research, teaching, estates, facilities, student activity, and contractor operations. It applies to all staff, students, visitors, contractors, and others who may be affected by university activities.

The overriding requirement of this policy is that all staff, students, and contractors must avoid working at height, wherever possible, and must put a suitable risk assessment in place and implement suitable and sufficient controls where working at height cannot be avoided. This includes ensuring the safety of those who may be impacted by the work at height (e.g., those working beneath the work at height activity). All staff must follow this policy and other relevant procedures for work at height.

3. Definitions

Work at height – means work in any place where, if there were no precautions in place, a person could fall a distance liable to cause personal injury.

Work platform – A working platform can now be virtually any surface from which work can be carried out, such as a roof, a floor, a platform on a scaffold, mobile elevating work platform (MEWP), the treads of a stepladder.

Work equipment – any machinery, appliance, apparatus, tool, or installation for use at work (whether exclusively or not). This includes equipment which employees provide for their own use at work. The scope of work equipment is, therefore, extremely wide.

Fragile surface – any surface that would be liable to fail if any reasonably foreseeable loading were to be applied to it.

Access equipment – any equipment that is specifically designed to allow the user to work safely at height (e.g., ladders, scaffolds, tower scaffolds).

Competent person – a person who has the skills, knowledge, attitude, training, and experience to undertake the role effectively.

4. Responsibilities

The University will ensure that:

- Work at height is avoided wherever possible.
- Where work at height must be undertaken a suitable and sufficient risk assessment undertaken by a competent person is in place, appropriate safe systems of work are in place and appropriate equipment, and personal protective equipment is available.
- Organisational arrangements are clearly defined for achieving compliance (see roles and responsibilities section of this policy).
- All work at height is properly planned, organised, and supervised and control measures implemented prior to any work commencing.
- Work at height is never carried out alone and is always supervised.

- Where weather conditions endanger health or safety, work at height activities are postponed.
- Those personnel involved in work at height activities receive appropriate training and are provided with suitable access/work equipment so that they can operate safely and without risk to themselves and others.

4.1 Associate Director of Estates

The Associate Director of Estates (within their area of management and control), is responsible for:

- Implementing a management system (including the provision of adequate resources), and estates work at height procedures which ensure the avoidance of working at height where possible, or, where this is not possible, ensures that activities are appropriately risk assessed to establish and put in the necessary control measures to ensure work is undertaken safely.
- Appoint one or more suitably qualified and experienced 'responsible persons' to assess working at height tasks, including work at height activities which fall within the requirement of a permit to work system.
- Formally identifying the roles and responsibilities of their staff in respect of the day-to-day management of work at height activities.
- Periodically reviewing, with relevant staff, the effectiveness of the above management system.
- Ensuring that for all capital works, building developments and refurbishments, the avoidance of work at height is considered and, if reasonably practicable to do so, implemented at the design stage.
- An audit of all roof areas is undertaken (including internal structures) to assess requirements for edge, fragile surface protection, or the control of unauthorised access.
- Appropriate fixed barriers and/or other fall arrest systems are installed in any areas where staff must conduct regular routine maintenance or inspections and there is a risk associated with working at height.
- Personal fall protection equipment is supplied correctly for each installation and inspected before first use and then at least every six months or after circumstances which might jeopardise safety have occurred, with inspection records retained. This includes checking that no equipment has been in service for more than the manufacturer's recommended time period.
- Ensuring any staff and contractors engaged by Estates are monitored to ensure they are trained and competent to complete the work at height tasks they are being engaged to undertake.
- Ensuring any incidents involving working at height are reported and, where necessary, investigated in consultation with the Health and Safety department.

Note: The Associate Director of Estates can delegate implementation of the above responsibilities to appropriately competent members of their staff.

4.2 Estates Management Staff

Estates management staff are responsible for ensuring that:

- Working at height is avoided, where possible.

- All work at height is properly planned and organised, ensuring this is proportionate to the risks involved, and that all risks are assessed, periodically reviewed, and risk controls implemented.
- Controlled access to restricted locations is implemented where there is a risk of falling from height, ensuring there is a maintained register of all these locations, including those which require a permit to work or an access authorisation.
- There is an adequate supply and range of access equipment (including access and personal protective) available to their staff for the work at height tasks being conducted, it is suitable for the task being undertaken, and staff use it as required.
- A planned preventative maintenance programme is in place for all Estates owned equipment used for working at height.
- Safe systems of work and procedures are in place, and that they are followed and regularly reviewed.
- All equipment is inspected in accordance with relevant regulations (i.e., PUWER and LOLER), with records of such inspections maintained, including the retention of a ladder register and associated inspection log.
- All fall arrest and restraint equipment is inspected before use
- A permit to work system is in place that covers high risk working at height tasks, that the system is understood and followed by all those that it affects, including those within the faculties.
- A list of all restricted or controlled spaces due to working at height risks or risk of falling is maintained and kept up to date.
- All contractors are issued with and agree to adhere to and follow this policy and all related estates procedures.
- Procedures are in place to restrict work appropriately during inclement weather and work is postponed where weather conditions present a danger to health and safety
- All staff and contractors engaged by the Estates department are competent to undertake the work at height tasks they are being asked to do.
- Any incidents involving working at height are reported and investigated, where necessary, in consultation with the Head of Health and Safety.

4.3 Associate Directors, Heads of Colleges/Directorates/Departments

Associate Directors, Heads of School/Directorate and department are responsible for:

- Implementing a management system (including the provision of adequate resources) which ensures the avoidance of working at height where possible, or, where this is not possible, ensures activities are appropriately risk assessed to establish and implement necessary control measures.
- Ensure staff including managers who are responsible for work at height activities are competent to assess tasks, including work at height activities which fall within the requirement of a permit to work system and will be subject to the Estates work at height procedure and permit to work system.
- Formally identifying the roles and responsibilities of their staff in respect of the day-to-day management of work at height activities.
- Any incidents involving working at height are reported and investigated, where necessary, in consultation with the Associate Director of Health, Safety and Environment

- Applying for such resources as are appropriate to discharge the University's statutory obligations.
- All staff and contractors engaged are competent to undertake the work at height tasks they are being asked to do.
- Periodically reviewing, with relevant staff, the effectiveness of the above management system.

Note: The Associate Directors, Heads of School/Department/Directorate can delegate implementation of the above responsibilities to appropriately competent members of their staff.

4.4 Managers and Supervisors

Managers and supervisors across the university are responsible for ensuring that:

- Working at height is avoided, wherever possible.
- All work at height is properly planned and organised, ensuring this is proportionate to the risks involved, all risks are assessed, periodically reviewed, and risk controls implemented.
- There is an adequate supply and range of equipment (including access and personal protective) available to their staff for the type of working at height tasks being conducted, it is suitable for the task being undertaken, and staff use it as required.
- All their staff (who are required to work at height as part of their role) and contractors (engaged to do working at height tasks) receive information, instruction, and training for the tasks they are required to do.
- They act upon any report of an activity or defect likely to endanger safety and report these to their line management and via the university's online incident reporting system.
- Ensure staff are suitably competent and able to undertake duties
- Where, and if needed, go through the Estate permit to work system, conducting all required risk assessments and method statements and act as the working at height task supervisor while the permit is active. Staff should follow the advice and guidance of the permit authoriser, or if not able to perform the role of supervisor, a competent person is engaged to do such work on their behalf.
- Any incidents involving work at height activities within their area of responsibility are reported and investigated, where necessary, in consultation with the Associate Director of Health, Safety and Environment

4.5 Permit to Work Authorisers

Permit to Work Authorisers (work at height) will:

- Not issue permits for work they are going to carry out themselves unless this has been countersigned by another permit (working at height) issuer.

- Ensure all associated risks have been assessed involved in working at height including the safe system of work, the selection and, where necessary and the appropriate inspection of suitable equipment.
- Only issue permits to work where necessary and as set out in the permit to work procedure
- Ensure all necessary precautions, including emergency procedures, have been communicated to the person in charge of the working at height task.
- When needed check the workplace before it is used and any work equipment that may have been installed or assembled prior to use and carry out inspections, where required.
- Be responsible for the issue of the permits to work, determining if the supplied risk assessments, method statements, and emergency plans are sufficient for the work to proceed. They are responsible for the management of staff and contractors while they are on site, and the cancellation of the permit.
- Ensure random spot checks on permit to work tasks, to ensure it is safe, and all safety features and mitigations are in place, as required.
- Act upon any report of an activity or defect likely to endanger safety and report these to both their line manager and via the university's online incident reporting system.
- Assist with any accident/incident investigation as requested by line manager or member of the health and safety team.

4.6 Contractors

All work undertaken by contractors must only be carried out following approval of relevant risk assessments and method statements and/or issue of permit to work detailing how the work will be carried out in a safe manner. Approval will usually be by the Project or Authorising Manager.

Contractors working on behalf of the University must:

- Carry out and provide suitable risk assessments for any activities requiring work at height.
- Work to approved method statements with adequate controls to prevent injury to themselves or others who may be affected by their work.
- Ensure their staff receive suitable training and are competent to undertake the activity
- Are medically fit to undertake the activity
- Provide suitable maintained access equipment to carry out the required work and check that it has been correctly installed before use, and at appropriate periods thereafter.
- Prevent unauthorised entry to access equipment when not in use.
- Report all accidents or near miss to their contact in the University.

4.7 Health, Safety & Environment Team

The Health, Safety and Environment Team are responsible for:

- The provision of advice and guidance on the application of the legislative requirements.
- Where necessary, liaising with the enforcement authorities, including in relation to incidents reported under RIDDOR.

- Monitoring and auditing compliance with the requirements of this procedure.

4.8 All Personnel Undertaking Work at Height

Personnel working at height (including staff, visitors and students) must:

- Work in accordance with any risk assessment, method statement or permit to work associated with working at height.
- Undertake and work in accordance with any information, instruction and training provided.
- Use any equipment supplied (including safety devices) properly, and in accordance with training and instruction provided.
- Not undertake any actions which may endanger themselves or other persons.
- Assist with the assessment of risks, informing their manager/supervisor if they suspect that the existing safe system of work is ineffective or inadequate, and stopping any work until advised it is safe to proceed.
- Promptly report any incidents or defects in equipment to their manager/supervisor.
- Inform their manager/supervisor of any health issues that may preclude them from working at height.
- Carry out any required pre-use checks of equipment, reporting any defects to their manager/supervisor.
- Follow the instructions on safety signage and not access restricted locations they are not approved to enter.

5. Risk Assessment

If work at height cannot be avoided, a suitable and sufficient risk assessment must be undertaken. The outcomes of this risk assessment will establish all necessary control measures, including any safe systems of work, and the provision of emergency procedures. Both regular and irregular activities associated with the task should be considered when carrying out a general risk assessment. Where it is identified that the work at height operation involves occasional or infrequent activities which fall outside the parameters of the general risk assessment, a specific risk assessment should be carried out.

6. Selection and management of access equipment

6.1 Ladders and Stepladders

- Ladders must only be used for low risk, short duration activities which do not require higher fall protection. Training and risk assessment of the activity is required prior to use of ladders. Pre-use checks must also be carried out by the user at the beginning of the day/job and if something has changed (e.g., ladder has been dropped, damaged, or moved from a dirty location).

- Ensure the stiles are not bent or damaged.
- Ensure the feet are not damaged or missing, they touch the ground fully and ensure they are clean to prevent slipping.
- Ensure the rungs are not bent or damaged to prevent the ladder from falling.
- Locking mechanism (if any) - ensure they are engaged when the ladder is put in place and are not damaged or worn.
- Ensure the steps on the ladder are clean to prevent slips and the fixing must be secure and not loose as they can collapse.
- Ensure the step ladder platform is not damaged or slippery.
- Ladders should be positioned on a firm base at a 1:4 gradient against a wall and secured against a structure, wherever possible.
- Care must be taken in the placement as not all work areas will be suitable.
- Ladders must be long enough for the task to avoid over stretching.
- Always face the ladder while climbing or descending the ladder.
- Always maintain three-point contact when using the ladder (one hand and two feet).
- Stepladders should face the work activity and not be located side on.

6.2 Mobile Access Equipment

There are a variety of different types of equipment including cherry pickers and scissor lifts that are collectively termed as mobile elevating work platforms (MEWPs). These can be suitable for roof access and short duration work such as inspection or maintenance of equipment. Equipment must be used on firm solid ground and within the correct weight restrictions of the surface, this is assessed by competent risk assessment. If there is a risk of people falling from the platform, a harness with a short work restraint lanyard must be secured to a suitable manufacturer-provided anchorage point within the basket. Staff using mobile working platforms will receive suitable competent training which will include obtaining the correct IPAF licence for operating the equipment. A programme of daily visual checks, regular inspections and servicing schedules should be established in accordance with the manufacturer's instructions and the risks associated with each MEWP. Operators must report defects or problems to their supervisor immediately. Reported problems should be put right quickly and the MEWP taken out of service if the item is safety critical. Remedial work, if required, should be carried out by a competent person; this may be an external contractor. The MEWP must be thoroughly examined at least every six months by a competent person or in accordance with an examination scheme drawn up by a competent person.

6.3 Working With Towers

Towers should be erected following a safe method of work and only used a competent person who has received suitable training in the equipment use and obtained the correct PASMA licence where appropriate. All towers erected must be inspected following assembly and then at suitable regular intervals by a competent person. In addition, if the tower is used for construction work and a person could fall 2 metres or more from the working platform, then it must be inspected following assembly and then every 7 days. Stop work if the inspection shows it is not safe to continue and put right any faults. The result of an inspection must be recorded and kept until the next inspection is carried out and recorded. Never use a tower in strong winds, as a support for ladders or other access equipment. When

moving a tower, make sure the height is reduced to a maximum of 4 metres and/or in line with manufacturer's guidance, check ground is firm, level, and free from potholes, push or pull by manual effort from base only to avoid tipping over. Never move a tower in windy conditions or with materials or people on it.

7. Selection and use of Fall Protection Equipment.

The principles of the hierarchy of control are important when selecting appropriate safety equipment for working at height:

- Prevention – guardrails / barriers / purlin trolleys / safety decking.
- Passive arrest – safety nets / fall arrest mats.
- Active arrest – cable and track-based systems.
- Mitigation of any consequences of an accident.
- Personal protective equipment (PPE) – full body harness and a lanyard.

The risk of a fall must, wherever possible, be designed out. If this is not possible, the above hierarchy must be followed in equipment selection.

8. Prevention of Falling Objects

All locations permanent and temporary, must have restricted access signage and are secured to restrict access where a fall from height is a risk.

The University will either have an access control system in place or locked key access to all high-risk locations, including access ladders, roof access, and or controlled areas within buildings. Key management systems will be in place, where key sign out to restricted areas is tightly controlled and can only be given out through specified processes (like permit to work system or through an authority to access process) by key responsible personnel. All staff that are given either key card access or have access to keys to these locations, will be assessed as competent to safely enter or be in these locations. Temporary locations for working at height (i.e., scaffolding) must be built and secured to ensure access is restricted, security and access control requirements are included in key contractor information and ensured it is considered at the design stage of a project. In environments open to public and non-trained staff, appropriate measures must be taken to deter and protect people from accessing locations where they are at risk from falls from height (i.e., restrictions on window opening, secured barrier protection locations (both permanent and temporary), if needed.

9. Roof Access and Fragile surfaces

Any work on the roofs of university buildings whether for maintenance or other reasons must be approved by the Estates department and the estates departments delegated responsible person(s) through the university permit to work procedure, please see point 4.7. Access to roof areas will only be granted to staff or contractors who possess appropriate qualifications, training and/or experience in relation to the type of roof and the nature of the work being carried out. Estates will retain a written record of any access granted. The University conducts surveys of work at height locations ensuring fixed barrier protection is fitted where needed (for both edge protection and for fragile surfaces) and these locations are regularly inspected, with action taken to resolve any issues/problems arising. Building

roofs are installed with appropriate safety lines (commonly referred to as 'Mansafe Systems') where necessary, that will be inspected in accordance with the relevant regulations; records of inspection and maintenance of the fixed installations are stored within Estates department.

10. Permit to Work

All non-routine work at height on campus requires a permit to work to be issued from the estates department. The process and requirements of a permit is explained in detail in the Estates Permit to work procedure. A permit to work may not be required for activities that are carried out routinely within a department and where a risk assessment and safe system of work is in place and has identified all necessary control measures, including any safe systems of work, and the provision of emergency procedures.

11. Emergency Response and Planning

Any safe systems of work developed within colleges, directorates, departments or Estates must include an emergency plan that considers how an injured worker could be removed safely. The speed of response is an essential consideration, especially when a safety harness is being used as a control measure. Persons suspended in a harness can become unresponsive in as little as five minutes and may be fatally injured in 15 minutes if help is not immediately available. Due to the need for rapid response, reliance must not be placed on the emergency services to affect a rescue, unless this has been formally agreed with the emergency services. Rescue procedures could include use of a second MEWP to recover the person, or procedures to safely lower the MEWP and person to the ground.

12. Training

Those responsible for managing work at height must ensure that those who undertake such activities receive sufficient information, instruction, training, and supervision, necessary for them to work safely. This includes but is not limited to:

- The findings of the risk assessment, and the requirements of any safety system of work, associated method statement, and emergency procedures.
- Training relating to the safe operation and use of access equipment, for example:
 - Ladder Safety and Safe Use of Ladders
 - Mobile elevating work platforms (MEWP) – operators will have attended a recognised operator training course (e.g., International Powered Access Federation (IPAF) or equivalent) and received a certificate, card, or 'licence', listing the categories of MEWP the bearer is trained to operate. In addition, formal training for the type of MEWP; operators should have received familiarisation training on the controls and operation of the specific make and model of MEWP they are using.
 - Erection of towers– persons must be trained and competent and familiar with the type of tower to be installed. They should be trained by the Prefabricated Access Suppliers' and Manufacturers' Association (PASMA), or equivalent. Staff using the scaffolding must also be trained on safe use, including emergency procedures. Use of harnesses – staff must undergo IPAF or equivalent training to use and inspect safety harnesses.

13. Equipment Inventories

An inventory of access/work equipment owned by each College/Directorate must be maintained. As a minimum, details of the equipment number, stored location, last inspection date, and next inspection due date must be recorded. All statutory examination records must be kept up to date within departments. Any defects that arise from an inspection must also be recorded, including when any equipment is decommissioned or disposed of. Ladders including stepladders must be subject to 6 monthly inspections by a competent person.

14. Implementation

The policy must be communicated and implemented through Colleges/Directorates and departments by the member of the health and a safety committee and those they delegate responsibility to via departmental meetings committees, staff meeting, briefings and cascades. The procedure is communicated to all those working at height through relevant training. The procedure will be available via the University policy webpages. This procedure and relevant supporting documentation are also published on the University Health and Safety intranet site. All staff have a responsibility to ensure they read, understand and adhere to university health and safety policy.