



WORKING AT HEIGHT POLICY

26th March 2024



INTEGRITY



PRIDE



RESPECT

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Glossary of Terms

Term / Acronym	Definition / Meaning
Collective Protection	Equipment that does not require the person working at height to act to be effective, for example a permanent or temporary guard rail.
Competent Person	Person with sufficient skills, knowledge and experience are employed to perform the task, or, if they are being trained, that they work under the supervision of somebody competent to do it.
Drop Zone	An area in which items may fall from height – Falling objects may be purposely cut off of a tree or fall during climbing, such as deadwood or tools
Exclusion Zone	A cordoned off area which contains all working operations, to exclude anyone other than the working team entering the working area.
LOLER	Lifting Operations & Lifting Equipment Regulations
MEWP	Mobile Elevated Work Platform
Short Duration Tasks	Tasks that take less than 30 minutes to complete
Work at Height (WAH)	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 unless preventative action is taken.
WAHR	Work at Height Regulations 2005

1 Introduction

Falls from height are one of the biggest causes of workplace fatalities and major injuries. In tree works falls from height are still common often resulting in serious injury. Common causes are falls from ladders, through fragile roofs and accessing trees. For example, you are working at height if you:

- Are working on a ladder/step ladder or a flat roof.
- Could fall through a fragile surface.
- Could fall into an opening in a floor or a hole in the ground.

2 Purpose

The purpose of WAHR is to prevent death and injury from a fall from height. Identify those responsible for and the method to be adopted to comply with the WAHR and other legislation & Industry best practice guidance.

3 Scope

The company will take all reasonable steps to provide a safe working environment for all employees who may be affected by work at height activities.

4 Roles and Responsibilities

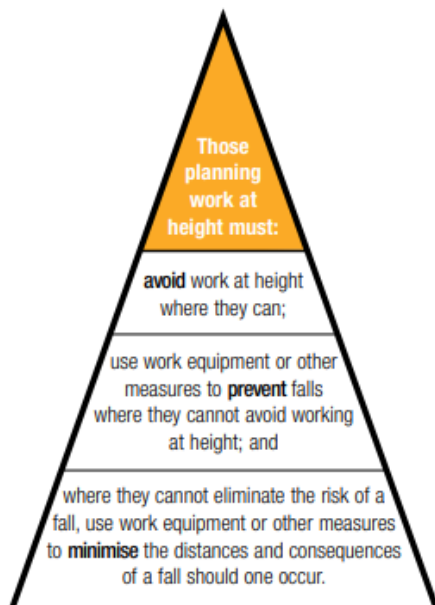
Chief Executive Officer	Provide the means to be able to perform all tasks within this policy
Chief Operating Officers	To ensure safe systems of work are employed to reduce risk of injury. To make sure work is properly planned, supervised, and carried out by competent people including using the right type of equipment for working at height.
Managers / Supervisors	Ensure that: <ul style="list-style-type: none"> • All work at height is properly planned and organised consistent with the hierarchical approach specified in regulations. • All work at height is identified and a specific site risk assessment is in place highlighting most suitable means of access and all team members made fully aware of its content. • All work at height takes account of the weather conditions that could endanger health and safety.

	<ul style="list-style-type: none"> • All those involved in work at height are trained and competent. • The place where work at height is done is safe. • All equipment for work at height is appropriately inspected. • The risks from fragile surfaces are properly controlled, and the risks from falling objects are properly controlled. Tree Work drop zones are clearly identified restricting access from unauthorised personnel. • You must ensure that the work is properly planned, appropriately supervised, and carried out in a safe way as reasonably practicable. • Ensure that equipment is checked by a competent person on a regular basis. • You must plan for emergencies and rescue. • You must ensure all involved in work process are fully briefed on the site risk assessment.
Employees	<p>Ensure that:</p> <ul style="list-style-type: none"> • You comply with safety rules. • Ensure all aspects of the site risk assessments are always followed. • Report any safety hazards to your manager/supervisor. • Co-operate with your manager/supervisor. • Pre use checks are completed prior to each day's work. • Use the equipment supplied properly, following any training and instructions (unless you think that would be unsafe, in which case you should seek further instructions before continuing).

5 Procedure – Hierarchy of Controls

The Working at Height Regulations 2005 apply to all work at height where there is a risk of a fall liable to cause personal injury. Nurture Group management and supervision must apply the following hierarchy of controls.

Before working at height, you must work through these simple steps:



- **Avoid work at height where it is reasonably practicable to do so.**
- **Use work equipment or other measures to prevent falls where they cannot avoid working at height and where they cannot eliminate the risk of a fall.**
- **Use work equipment or other measures to minimise the distances and consequences of a fall should one occur.**

For tree works this equates to

- Ground Level – Consider straight felling or works with pole pruner.
- MEWP use where reasonably practicable or deemed a more efficient operation.
- Climb tree from rope & harness in line with industry guidance.

You should

- Follow the above hierarchy of control - Where possible eliminate the need to undertake work at height - Do as much work as possible from the ground,

- Ensure workers can get safely to & from where they work at height.
- Ensure equipment is suitable, stable, and strong enough for the job, maintained and checked regularly.
- Take precautions when working on or near fragile surfaces.
- Provide protection from falling objects.
- Consider our emergency evacuations and rescue procedures.
- Follow the safe system of work for the task.

6 Planning Considerations

The following are all requirements in law that you need to consider when planning and undertaking work at height. You must:

- Take account of weather conditions that could compromise worker safety.
- Check that the place (e.g., a roof) where work at height is to be undertaken is safe. Each place where people will work at height needs to be checked every time before use.
- Stop materials or objects from falling or, if it is not reasonably practicable to prevent objects falling, take suitable and sufficient measures to make sure no one can be injured, e.g. use exclusion & drop zones to keep people away or mesh on scaffold to stop materials such as bricks falling off;
- Store materials and objects safely so they won't cause injury if they are disturbed or collapse.
- Plan for emergencies and rescue, e.g., agree a set procedure for evacuation. Think about foreseeable situations and make sure employees know the emergency procedures. Don't just rely entirely on the emergency services for rescue in your plan.
- Risk assessment will determine where working at height must be supervised.

7 Risk Assessment

Before any work involving working at height is begun a site-specific risk assessment must be created for all tasks which is read, understood & signed as by all operators involved in the works.

All creating Site risk assessments will be trained in creating risk assessments and made fully aware of any possible WAH risk.

Where work cannot be done at a safe level, the following will be considered by the person carrying out the risk assessment and formulating the safe working methods:

1. The physical condition of the personnel involved (e.g. age, fitness, vertigo, pregnancy, etc.)
2. The activity
3. Equipment to be used.
4. Location (e.g., near or over water, roads, under power lines, on steep roofs with or without parapets, on weak structure such as "asbestos" roofs, etc.),
5. The environment, (e.g., weather, temperature, lighting, condition of roof or walkways, etc.),
6. Duration of the work,
7. Condition and stability of the work surfaces.
8. Tree structural condition, presence of significant defects/decay.
9. Anchor point availability & strength to ensure suitable & adequate protection.

The safe working method statement will be explained in advance to the personnel who will carry out the work.

8 Competency to Work

Regulation 5 of the WAHR 2005 requires any person undertaking work at height must be competent to do so.

Those who work at height will be provided suitable & sufficient training specific to the task being completed. This will ensure that a person:

- Undertake safely their defined activity at their level of responsibility.

- Fully understand any potential risks relating to the work activity including equipment for any tasks they are undertaking.
- Detect any defects or omissions and recognise any implications for health & safety with the aim of specifying appropriate remedial actions that may be required in relation to their work activities.

When a more technical level of competence is required, for example, Rope & Harness work, Elevated Platforms, Erecting Scaffold Towers etc existing training and certification schemes drawn up by trade associations and industry will demonstrate competency e.g. IPAF, NPTC, PASMA etc. All competency training for specialist tasks must be refreshed at least every 5 years.

9 Equipment Selection

When selecting equipment for work at height, Nurture Group will:

- Provide the most suitable equipment appropriate for the work depending on risk assessment.
- Take account of factors such as: the working conditions (e.g., weather)
- The nature, frequency, and duration of the work.
- The risks to the safety of everyone where the work equipment will be used.

10 Equipment Inspection

Equipment for WAH requires regular inspection to ensure its safe to use, marking such equipment is completed to make sure it's obvious when the next inspection is due.

Formal thorough inspections of lifting equipment used for people & loads will be completed as required by LOLER at least every 6 months by a competent person.

Any equipment exposed to conditions that may cause it to deteriorate, and result in a dangerous situation, must be inspected at suitable intervals appropriate to the environment and use.

Records of any inspection for types of work equipment are kept including: guard rails, toe-boards, barriers or similar collective means of protection; working platforms (any platform used as a place of work or as a means of getting to and from work, e.g. a gangway) that are fixed (e.g. a scaffold around a building) or mobile (e.g. a mobile elevated working platform (MEWP) or scaffold tower); or a ladder.

We also ensure that before we use any equipment, such as a MEWP, which has come from another business or rental company is accompanied by an indication (clear to everyone involved) when the last thorough examination has been carried out.

Routine pre use checks are completed by individual operators prior to usage of the equipment ensuring that equipment is safe for use.

11 Equipment Maintenance

Inspection & thorough examination are not a substitute for properly maintaining equipment.

All equipment receives planned preventative maintenance at pre-set intervals to ensure that the risks of deterioration or failure of the equipment is minimised.

The frequency of any maintenance will depend on the type of equipment, the conditions under which it is used, the manufacturer's instructions & any legislative requirements.

All maintenance is completed by competent people and logged records are kept & maintained.

Defective equipment is removed from service, and clearly identified as being unfit for use, quarantined and disposed of if irreparable.

12 Rope & Harness Equipment

Harness equipment will only be provided as a result of a risk assessment & must comply with all relevant current standards. These include:

- Harness selection is made following risk assessment ensuring correct type for location being used.
- Ensure all equipment has received a formal LOLER inspection within the previous 6 months.
- All users will complete daily inspections of equipment prior to works commencing.

13 Mobile Work Platforms e.g., Scaffolds & Scaffold Towers

Work equipment, for example scaffolding, needs to be assembled or installed according to the manufacturer's instructions and in keeping with industry guidelines.

Erection of scaffolding is a specialist operation and will only be carried out by a competent scaffolding organisation.

Before any works takes place on scaffolding, a certificate of safety will be provided by the erector.

Access to the work area must be restricted to unauthorised personnel in the vicinity.

Scaffold towers are to be erected by competent trained tower erector, (e.g. PASMA)

14 Elevated Work Platforms e.g. MEWPS

Mobile Access Equipment includes Mobile Elevating Work Platforms (MEWPs), telescopic and articulated boom platforms and mast platforms. Nurture Group will ensure that:

- All equipment has received a formal LOLER inspection within the previous 6 months.
- Mobile access equipment will only be operated by people who have been properly trained, certificated and are competent to do so,
- Emergency procedures to deal with power failure, fire, injury to or collapse of the operator will be established, and personnel made familiar with them (e.g. IPAF)
- Such equipment will be suitable for its use, be properly constructed and maintained,
- Maintenance records for the equipment are kept,
- The safe working load will be clearly marked and will not be exceeded,
- Put into place arrangements to ensure that the condition of the surface on which the equipment is going to operate will be checked for stability and the equipment will not be operated on any uneven or sloping ground,
- The equipment will be operated in accordance with the manufacturer's instructions to reduce risk to health and safety of Nurture Group's employees, contractors or any other person who might be affected by the company's operations.
- Equipment will be installed, modified, and dismantled only by a competent person,
- Adequate barriers will be installed to prevent people or vehicles being struck by any moving platform or falling materials,
- Suitable precautions will be taken to prevent any part of any mobile platform from touching, or coming into close enough distance to cause arcing, any overhead electricity supply cables. (In addition, no part of any mobile access equipment may be permitted to be within 15metres of an uninsulated overhead electric cable.).
- Operators take into consideration any inclement weather forecast when arranging for the positioning of the units,
- Where required through risk assessment, personnel operating or riding on mobile access equipment wear suitable harnesses properly secured to a suitable part of the platform,

15 Ladders & Step Ladders

Ladders & Steps can only be used where risk assessment shows that other work equipment is not justified because of low risk and short duration of work.

A risk assessment must be in place for all ladder / step ladder work where you should minimise the risk by ensuring that:

- The right type of ladder / step ladder is selected for the job.
- Users are competent and have been provided with adequate training.
- Equipment Must only be used in accordance with the manufacturer's instructions.
- All ladders will be checked & logged by a competent person on a regular basis. All will display a completed ladder inspection tag.
 - Heavily used ladders - every 3 months
 - Occasionally used – every 6 months

- All ladders will be checked for defects or damage before each use. If any defect is noted, the ladder will be immediately taken out of service & clearly marked – DO NOT USE.

16 Fragile Roof Work

Roof work is high risk and falls from roofs, through fragile roofs and fragile roof lights are one of the most common causes of workplace death and serious injury and must be managed safely. These accidents can also occur on roofs of factories, warehouses, and farm buildings when roof repair work or cleaning is being carried out.

Any surface from which WAH is carried out must be strong and stable enough so that any foreseeable loads, persons plus materials/loads they may be required to carry paced on it, will not lead to collapse.

The following are likely to be fragile and suitable & sufficient controls MUST be in place to avoid accidental falls within the Site Risk Assessment:

- Roof Lights.
- Liner panels on built-up sheeted roofs.
- Non-reinforced fibre cement sheets.
- Corroded metal sheets.
- Glass (including wired glass).
- Rotted chipboard.
- Slates and tiles.
- Unboarded domestic roof voids

17 Falling Objects

Falling objects result in severe injury and the wearing of helmets will be mandatory for anyone working at heights where there is a risk of falling objects.

The safe working methods will consider a system which:

- Provides barriers (e.g., toe boards or mesh guards to prevent items from slipping or being knocked off the edge of a structure),
- Secures objects to the structure concerned (e.g., lashing of scaffold boards),
- Ensures that there are no loose objects and that tools, other equipment & any containers are properly secured,
- Creates an exclusion zone, where necessary, beneath areas where work is taking place. All tree works will have identified drop & exclusion zones.
- All workers trained to fully understand the risks of objects falling & injuring people during their work activities.

In addition, when employees or contractors are working at heights above other work areas in clients premises their employees and other people must be excluded. Danger areas will be clearly marked with suitable safety signs indicating that access is restricted to essential personnel wearing hard hats whilst the work is in progress.

18 Monitoring and Auditing

The Chief Operating Officers have responsibility for ensuring this policy is implemented accordingly and monitored appropriately.

19 Compliance

Adherence to this policy is both an individual and a corporate responsibility. Wilful breach of this policy, or unauthorised departure from the procedures derived from this policy, may invoke the disciplinary procedure.

20 Review and Improvement

The Chief Operating Officers and the HSEQ team are responsible for reviewing this procedure, making any recommendations for improvement, and presenting these to the Senior Safety Committee for further consideration.

Nurture reserves the right to amend or discontinue the policy and any associated procedures at any time.