

'Height Aware' campaign 2006

Regulators' guidance



When

The campaign will be promoted on 10th May 2006 by Lord Hunt, Minister for Health and Safety at Work at the Access Industry Forum Conference, part of the Safety and Health Expo at the NEC, Birmingham.

Publicity/media activity, educational/promotional events and targeted inspections will take place across Great Britain from 22nd May until the end of June.

Why

This initiative supports HSE's Falls from Height Programme Plan for 2005 – 2008, the aim of which is to reduce by 2008 the number of work related fatal and major injuries caused by falls from height by 5% (2003/04 baseline).

- Falling from height is the most common cause of workplace fatalities
- In 2004/05, 53 people died and nearly 3800 were seriously injured as a result of falling from height whilst at work
- 60% of these injuries resulted from people falling distances from below head height
- Ladder accidents alone cost the UK economy £60 million each year

Work at height is often incidental to the main task being carried out and therefore the risks are not identified, especially for distances below head height. The campaign aims to raise awareness of when people are working at height, the associated risks and how to select the most appropriate precautions and equipment to carry out the work safely.

Who

The target activities are building and plant maintenance in their widest sense – both those who carry out the work and those that manage or procure it, including for example:

- electricians, mechanical and electrical fitters, painters and decorators, window cleaners, TV/video/audio engineers and caretakers; and
- facilities managers, commercial landlords, estates and building managers, housing associations and other landlords etc.

Annex 1 sets out the Standard Occupational Classifications (SOCs) to be used.

Objectives

- a. increase awareness of employers so they identify when they, or their employees, are working at height and any precautions they need to take. Particular focus to be on work at 'low' heights and use of ladders.
- b. influence attitudes to working at height to encourage those in control of the work to change their behaviour to select the most appropriate equipment for the job and ensure its proper use.
- c. influence the attitudes of clients and others procuring work to be done at height to bring about changes in their selection of competent contractors.
- d. work in partnership with Local Authorities (as regulators) and other stakeholders, to maximise outcomes.
- e. evaluate the effectiveness of the campaign so that lessons learned can be incorporated into future initiatives

Campaign support materials

A campaign pack is being developed and will be available from early April. It will include:

- campaign flyer
- information sheets covering planning work at height, selecting appropriate equipment and how to select and manage contractors
- 'Safe use of ladders and stepladders – An employers' guide', guidance booklet
- 'Top tips for ladder and stepladder safety', pocket card
- 'The Work at Height Regulations 2005 – a brief guide', leaflet
- CD Rom with the above information plus additional guidance

All the campaign pack information plus additional guidance and materials will be available on HSE's website.

Falls co-ordinators

Falls co-ordinators have been appointed for each of HSE's Divisions. Their role is to work with the campaign project team to plan and deliver the campaign activities locally and to support the falls work throughout the year.

Their key activities will include:

- communicating information about the campaign and programme and feeding back issues and progress with plans
- producing local instructions on the selection and targeting of inspection visits
- working with local authority colleagues, HSE Partnership Managers, other HSE staff and stakeholders to ensure activities are coordinated
- responding to questions locally from staff, local authority colleagues and stakeholders

Name	Location	Contact Details
Julie Kyle	Edinburgh, Scotland	0131 247 2119 (VPN 520) julie.kyle@hse.gsi.gov.uk
John McGrellis	Manchester, North West	0161 952 8459 (VPN 516) john.mcgrellis@hse.gsi.gov.uk
Carol Downes	Sheffield, Yorkshire and North East	0114 291 2370 (VPN 514) carol.downes@hse.gsi.gov.uk
Harvey Wild	Worcester, Midlands	0161 952 8319 (VPN 516) after 20th March:- 01905 743 600 (VPN 536) harvey.wild@hse.gsi.gov.uk
Paul Vinnecombe	East Grinstead, East and South East	01342 33 4247 (VPN 503) paul.vinnecombe@hse.gsi.gov.uk
Karl Howes	Luton, East and South East	01582 44 4329 (VPN 508) karl.howes@hse.gsi.gov.uk
Steve Kirton	London	020 7556 2174 (VPN 506) steve.kirton@hse.gsi.gov.uk
Andrew Kingscott	Bristol, Wales and South West	0117 988 6028 (VPN 501) andrew.kingscott@hse.gsi.gov.uk

What

This campaign builds on and broadens the publicity and inspection work last year during Ladders Week.

The campaign will have three key elements:

1. Publicity/media
2. Educational/promotional Events
3. Inspections

1. Publicity/media

A nationally based campaign, targeting the defined audience, will be run from 22nd May for 6 weeks. Details of the campaign are currently under development but are likely to include, national, regional and trade press advertising, publication of campaign led articles and radio advertising.

2. Educational/promotional Events

HSE has committed to running:

- at least 14 Safety & Health Awareness Days (SHADs) aimed at building and plant maintenance contractors. To cover:
 - campaign messages
 - principles of the Work at Height Regulations
 - practical alternatives to ladders
 - ladder and stepladder safety
 - other issues relevant to the audience, eg management of asbestos, manual handling, slips and trips
- 21 smaller, possibly breakfast type, events aimed at clients, facilities managers etc. To cover:
 - campaign messages
 - their role and responsibilities
 - case studies
 - management of asbestos in buildings

Speedy Hire and HSS Ltd have confirmed they will provide equipment for demonstrations at events. Power point presentations and video clips will be available to help deliver the events from the beginning of April.

This presents an excellent opportunity to work jointly with Local Authorities to develop and run these events. We are also exploring any other ideas Local Authorities may have for local projects, events and other initiatives which would help the campaign reach a wider audience and have more impact. Some funding is available to support these activities and will be considered on a case by case basis.

Local Authorities have been asked to contact their falls coordinator by the end of March to discuss in more detail how they would like to be involved. Any bids for funding should also be discussed with them, no spending commitments should be made until funding is confirmed.

We plan to promote the key messages of the campaign through a number of 'point of sale' initiatives, where information and advice will be made available directly to customers by HSE's Health and Safety Awareness Officers (HSAOs). This approach builds on a pilot completed by HSE's Construction Division last year with Dulux Paints. Further details about this project and briefing for those staff involved will be provided in April.

Work is also in hand to encourage employers, trade associations, unions and other stakeholders to distribute campaign materials, carry articles in their publications and to run their own work at height initiatives during the campaign period.

3. Inspections

- a) Inspections during the campaign period will target:-
 - i) clients, facilities managers, commercial landlords, estates management companies etc; and
 - ii) building and plant maintenance contractors, eg electrical fitters, painters, ventilation engineers etc

Inspections will primarily be head office visits to i) and ii) above, to cover work at height issues and the management of contractors where appropriate. In addition, duty to manage asbestos should be discussed where appropriate. Follow up visits to inspect examples of work in practice should be arranged where standards of health and safety management raise concerns.

When visiting clients, facility managers etc, you should obtain details of contractors who are used regularly to carry out tasks at height. This will identify new dutyholders for programme directed inspections (PDI) following the campaign period. The PDI visits will need careful coordination across Divisions, particularly with Construction.

Local Authority inspectors should discuss work at height issues relating to building and plant maintenance with building occupiers as part of their planned inspection activities. There may be other inspection opportunities, for example, joint LA/HSE visits to local landlords and property owners and inspection based projects to particular local target groups. Local Authorities have been given details of their falls coordinator to discuss ideas further and should talk to them about joint visits and other inspection activities to make sure duplication is avoided.

b) Inspections following the campaign will continue to target groups i) and ii) above and, in addition, large organisations who carry out significant building and plant maintenance activities at height. See the Business Group Delivery Plans for details.

c) Accident Follow up

HSE's HSAOs, will write to all dutyholders reporting a falls from height incident, providing guidance and seeking a response about action taken. Follow up visits will be paid to those who fail to respond. These follow up visits may be carried out at any time, ie. during the campaign or subsequently.

The start date for this work is still to be confirmed. Details of the standard letters to be used and the types of incidents to be included will be provided to nominated HSAOs in April. This information will also be available on the LA extranet should Local Authorities wish to run a similar scheme.

Enforcement

All inspections should be carried out in accordance with the guidance in the 'Falls from Height Topic Inspection Pack', revised in summer 2005, available on HSE's website, Falls from Height page. Instant visit reports should be used where appropriate and dutyholders encouraged to write to inspectors confirming action taken. Inspectors should only write letters in exceptional circumstances (usually only when formal enforcement action has been taken).

Formal enforcement should be in accordance with the Enforcement Policy Statement and Enforcement Management Model. Annex 2 is Section 7 of the Topic Inspection Pack, the 'Inspector Checklist', which provides a guide for the Initial Enforcement Expectation and links to template notices.

Recording Information

A feedback form to be used at SHADs and breakfast type events will be provided to the falls coordinators by the end of April.

Inspections must be recorded using an Inspection Report Form (IRF) and the dutyholder assessed against the existing Risk Control Indicators. These are reproduced at Annex 3.

Where a score of 3 or 4 is given against any of the RCIs the answers to the following questions must be put in the text comment box for the visit:

1. Action taken (eg. advice, voluntary cessation of work, destruction of equipment, IN, PN or PR)
2. Reason for above (what was the non compliance)
3. Outcome (what improvement has been achieved)

For all other activities where an IRF is not completed, ie. educational/ promotional events, point of sale work, the keyword **FALLS** must be entered in the summary box on the notes page.

LA inspector visits can be recorded on the HELA Website CO-ORD system using the IRF as described above or on a proforma to be completed at the time of the visit. Copies of this proforma, together with the arrangements for completing and returning them, will be available in early April from the falls coordinators.

Evaluation

An evaluation plan has been agreed. It will:

- Assess the impact of the campaign on employer and employee awareness of, and attitudes to, the risks when working at height and the actions that can be taken to reduce these risks;
- Explore the extent to which changing attitudes and raising awareness leads to the adoption of safer working practices; and
- Assess the campaign process through analysis of management information and exploring the experiences of those involved.

The work will be carried out by an independent research organisation and will involve:

- quantitative surveys - prior to the campaign to establish a baseline, immediately after the campaign and a follow up survey after 2 months;
- Qualitative research with dutyholders and stakeholders;
- Observational research of educational/promotional events; and
- Analysis of management information, eg. website traffic, Infoline calls, RCI scores.

Key references

The Work at Height Regulations 2005
<http://www.opsi.gov.uk/si/si2005/20050735.htm>

HSE's Work at Height Regulations 2005 - Presentations
<http://www.hse.gov.uk/falls/downloads/index.htm>

Topic pack OC200/30 Safe use of ladders and stepladders
http://www.hse.gov.uk/foi/internalops/fod/oc/200-299/200_30.pdf

Topic pack OC314/20 Preventing falls from Mobile Elevated Working Platforms (MEWPS) and selection and use of all Fall Protection Equipment
http://www.hse.gov.uk/foi/internalops/fod/oc/300-399/314_20.pdf

HSE's Falls from Height Topic Inspection Pack
<http://www.hse.gov.uk/foi/internalops/fod/inspect/falls.pdf>

Template Notices in Topic-Pack	Page Number
Risk Assessment	41
Managing Contractors	44
Fragile Roofs	45
Inadequate Precautions at open edges	46
And others	46-49

HSE's free leaflets – Falls from Height
<http://www.hse.gov.uk/pubns/fallindx.htm>

Contact details

Sarah Mallagh
Campaign Project Manager
0151 951 4560
sarah.mallagh@hse.gsi.gov.uk

Ian Greenwood
Falls from Height Programme Manager
020 717 6983
ian.greenwood@hse.gsi.gov.uk

Pam Waldron
Falls from Height Delivery Partner
0191 202 6211
pam.waldron@hse.gsi.gov.uk

Annex 1 - Standard occupational classification

Standard Occupational Classification (SOC)	SOC Code
<i>Total Audience</i>	
Property, housing and land managers	1231
Managers and proprietors in other services	1239
Civil engineers	2121
Mechanical engineers	2122
Electrical engineers	2123
Electronics engineers	2124
Chemical engineers	2125
Design and development engineers	2126
Production and process engineers	2127
Planning and qilty control engineers	2128
Engineering professionals n.e.c.	2129
Metal machining setters and setter operators	5221
Tool makers, tool fitters and markers-out	5222
Metal working production and maintenance fitters	5223
Electricians and electrical fitters	5241
Telecommunications engineers	5242
Lines repairers and cable jointers	5243
TV, video and audio engineers	5244
Computer engineers, installation and maintenance	5245
Electrical/electronics engineers	5249
Plumbers, heating and ventilating engineers	5314
Carpenters and joiners	5315
Glaziers, window fabricators and fitters	5316
Plasterers	5321
Floorers and wall tillers	5322
Painters and decorators	5323
Housekeepers and related occupations	6231
Caretakers	6232
Window cleaners	9231
Elementary cleaning occupations	9239

Annex 2 - Inspection topic pack, section 7: Inspector checklist

The Initial Enforcement Expectation (IEE) in the checklist is a guide only. Enforcement should be in accordance with current enforcement policy. The checklist is not intended to cover all work at height issues and inspectors should be aware of this during visits.

References are to the Inspection Topic Pack, template notices are in section 6 of the pack, see HSE website, Falls from height - information sources.

Risk Control Indicator 1	IEE
Identification	
Has the duty holder identified activities and precautions involving work at height. Has the hierarchy been considered when identifying such activities and precautions. (See Section 2.2.1 for guidance on the hierarchy)	
Has the duty holder considered work at height conducted by peripatetic workers? Are appropriate precautions provided including arrangements for supervision and training in the use of equipment?	
Has the duty holder carried out a risk assessment and identified work at height activities and appropriate precautions, including work, which is incidental or ancillary to the main activity? (See template Notice 1) [NB: <i>Formal enforcement action should be taken where activities present a significant risk</i>]	IN
Fragile Surfaces	
Has the duty holder identified fragile surfaces on site (e.g. asbestos cement roof sheets, plastic sheets, roof lights, bridged materials in silos, crusted surfaces of sludge lagoons etc) and have suitable precautions been identified for any work on or near fragile surfaces and to prevent inadvertent access onto them?	
Is access to fragile surfaces prohibited except under controlled conditions (e.g. governed by a permit to work system)?	
How are fragile roofs/gutters cleaned?	
Work is being carried out on or near to fragile surfaces and guardrails, coverings or other suitable precautions have not been provided, (See template Notice 8)	PN
Are warning signs fixed at the approach to fragile roofs when access is needed or foreseeable e.g. cleaning valley gutters? (See template Notice 4)	IN
Risk Control Indicator 2	
Equipment	
General	
Does the duty holder have a system in place to ensure that appropriate access equipment is selected for working at height given the circumstances of the job? Risk assessment should consider factors such as the duration, complexity of the work, conditions of the surface etc. when selecting suitable work equipment. (See guidance on some principles for the selection of work equipment Section 2.3.1)	
Have people who are expected to use work equipment received appropriate instructions and training in how to use it safely?	
Is work equipment appropriately inspected and maintained?	
Work at height is being carried out and there are no precautions against falling and there is a risk of a person falling a distance liable to cause personal injury. (See template Notice 9)	PN
Evidence indicates work at or near open edges will be done where a person could fall a distance liable to cause personal injury e.g. at a mezzanine floor/storage area above an office. There are no precautions against falling from an edge. (See template Notice 5)	IN

Edge Protection	
Guard rails, mid rails toe boards or similar barriers should be rigid enough to prevent a person or materials falling and their dimensions should comply with current standards (See Section 2.3.2)	
Stairs	
Provided with robust handrails? (See template Notice 6)	IN
General Scaffolds	
Erected, altered and dismantled by competent people?	
Provided with edge protection as listed above?	
Provided with fully boarded working platforms?	
Inspected by a competent person at least once per week?	
Tower Scaffolds	
Are there any tower scaffolds on site? (even if dismantled or hired)	
Have persons erecting and using towers had appropriate training?	
Are guardrails and toe boards provided?	
Is the height of the tower scaffold no more than 3 times the minimum base dimension? (or in accordance with the manufacturers instructions on height to base ratio) <i>[NB: the indicative base to height ratio should not be the sole basis of formal enforcement, see below]</i>	
Are wheels locked when in use and is the working platform empty when moved?	
Is safe access to the working platform provided? i.e. through internal trap doors	
If a tower has any of the following fault; no guard rails and toe boards; no safe working platform; height exceeds 3 times the base dimension and the manufacturers height v base dimension is not known and the tower is not tied to an adjacent structure; or the tower is not vertical; or a ladder is being used from the top of it.	PN
Mobile Elevating Working Platform (MEWP) See OC 314/20	
Should be safe plant i.e. correct type for the job, provided with adequate guard rails, toe boards, thoroughly examined in the last 6 months, properly maintained and inspected.	
Should be used on a safe site i.e. firm level ground which is free from slopes, holes etc and can cope with the load and segregated from other site traffic to avoid collisions.	
Should have a safe operator who is trained and experienced.	
No segregation of MEWP, or part of it, seen working at height in a live highway e.g. street lighting work, bridge repair and there is a risk of vehicle impact. Poor on site segregation and unsafe practices seen e.g. driving at speed in vicinity of MEWP being used for work at height.	PN
Ground conditions poor or not considered so there is a risk of an overturn or collapse e.g. failure to establish strength of ducts, manhole covers, suspended floors or MEWP wheels or outriggers seen sinking into the ground.	PN
No fall protection equipment provided or incompatible/inappropriate equipment used and unsafe practices seen e.g. climbing onto mid rails and or leaning over the edge to the extent that there is a risk of a fall. Inadequate anchorages in MEWP for fall protection.	PN
After dealing with immediate segregation issues as detailed above, safe system of work may be needed re segregation.	IN
No evidence of MEWP being thoroughly examined in the last 6 months, no defects visible.	IN

Working Platforms on Fork Lift Trucks (see guidance note PM28)	
Non-integrated platforms are acceptable for occasional, not routine use for work at height. Preference should be given to purpose built equipment for work at height such as tower/general scaffolding and MEWPS.	
Platform should be compatible with the truck.	
Platform should be secured to the forklift truck.	
Should have adequate edge protection as described above.	
Should be thoroughly examined every 6 months.	
Truck operators should be properly trained.	
If people are being raised or lowered on the forks or a pallet to access and work at height.	PN
Collective Safeguards for arresting Falls	
Nets and airbags should be positioned as close to the level at which persons are working so that any fall height is minimised.	
Should be sufficient clearance below the net to avoid injury due to a collision with an obstruction if a person fell into the net.	
Nets should not have any gaps at their edges through which a person could fall.	
Nets should be securely anchored.	
Requirements for Personal Fall Protection Systems	
Personal fall protection systems should only be used if risk assessment demonstrates that the work can be done safely while using the equipment and the use of other, safer (collective) work equipment is not reasonably practicable.	
Users of personal fall protection systems should be trained.	
Components of personal fall protection systems ie harnesses, lanyards, ropes, connectors, anchorages etc should be compatible, identifiable and regularly inspected.	
Fall arrest lanyards may need protection from sharp edges and there must be adequate clearance for the lanyard and energy absorber to deploy.	
Users must ensure inertia reel systems are anchored in accordance with manufacturers instructions. (usually above the user). (Often such systems are not designed for anchorage at foot level)	
Users of Fall arrest systems should have a rescue plan in place.	
Where lanyards are in use and there is visual evidence of significant defects or damage (cuts, abrasion see INDG 367 for details of inspections to be carried out)	PN
Scaffolding (Not tower) is being erected/dismantled/alterd with no safety harness and associated equipment . (See template Notice 7)	PN
Harnesses and lanyards are used frequently and there is no inspection regime (See INDG 367) but no evidence of defects.	IN
Work Restraint	
Must ensure the wearer cannot reach a position in which a fall could occur <i>[PN if circumstances taking place]</i>	
Ladders	
Question whether ladders/step ladders are the most appropriate equipment for access or a place of work given the circumstances (including duration) of the job. Would it be safer to use other work equipment e.g. tower scaffold?	
Have workers been instructed in the safe use of ladders e.g. 1 metre out for every 4 metres up, and the need to secure?	
Are adequate precautions in place to stop a ladder from slipping or falling eg. tied?	
Are ladders in good condition?	

Are ladders well maintained and inspected regularly?	
Portable leaning ladders are in use or are available for use and have defects such as splits in timber ladders, cracked welds at rung/stile connections on metal ladders, missing rungs, play between rungs and stiles, missing anti slip devices at the top and bottom, bent stiles at the bottom.	PN
Signs of damage or defects that are not likely to result in imminent risk of serious personal injury e.g. minor dents in rungs. (IN requires an individual ladder to be inspected or an inspection system to be implemented by a competent person)	IN
Ladders are in use for large jobs with unwieldy equipment or materials (e.g. replacing cast iron gutters) and persons could fall a distance liable to cause personal injury.	PN
Ladders are available for use for work where a person could fall a distance liable to cause personal injury and consideration has not been given to whether ladders are the most appropriate equipment for the work. (See template Notice 2)	IN
Homemade ladders are in use and the duty holder cannot demonstrate compliance with an appropriate standard.	PN
Risk Control Indicator 3	
Contractors	
Does the duty holder use contractors (including for small scale work such as minor repairs, lighting maintenance, as well as large scale work like redecoration, construction/installation work)?	
Does the duty holder have appropriate arrangements for managing contractors in relation to H&S e.g. pre meeting, induction (site rules), establishing contacts, sign in sign out, segregation arrangements, periodic monitoring of their work etc.?	
Has the duty holder enquired about a contractor's competence to work at height? The following questions/examples will help.	
1. What experience do they have for work at height. Ask for examples of previous work. Does the duty holder ask for references that include comment on H&S?	
2. What equipment will they use? Seek evidence of training, inspection, and maintenance.	
3. Are safety method statements/risk assessments required from contractors? (Can be a useful tool to monitor the work)	
4. What are their arrangements for supervision while on site to ensure that 3 are followed during the work?	
5. Are they a member of a relevant trade association?	
Is the duty holder aware of CDM Regs?	
Contractors are used regularly for work at height and no procedures exist for managing contractors. (See template Notice 3)	

Annex 3 - Risk control indicators

Risk Control Indicator 1	Identification of activities and precautions involving falls from height	Work in any place where there is a risk of a person falling a distance liable to cause personal injury, including maintenance, cleaning and repair, has been identified and workers instructed in precautions; access to fragile surfaces marked.
Risk Control Indicator 2	Selection, use and maintenance of equipment	Appropriate access equipment is provided, is well maintained and regularly inspected and used.
Risk Control Indicator 3	Systems for the procurement and control of contractors	Managers know how to screen potential contractors (in line with principles of CDM) and actively monitor their work.

Assessment scale			
Each risk control indicator should be assessed against the following 1-4 scale. A score of 1 must satisfy all the appropriate criteria of the risk control indicator.			
1	2	3	4
Full compliance in areas that matter	Broad compliance in areas that matter	Some compliance in areas that matter	Limited or no compliance in areas that matter