

INDEX 

Health and Safety Executive		Sector Information Minute	
Commercial and Consumer Services, Transportation and Utilities Sector (CACTUS)		SIM 05/2001/06	
Cancellation Date	10/05/2005	Open Government Status	Fully Open
Version No & Date	1: 10/05/2001	Author Unit/Section	F an E Sector

Target Audience:
AFQ Inspectors

FALLS FROM HEIGHT: SSP OBJECTIVE 4, WINDOW CLEANERS

This SIM complements the guidance in the protocol from the SSP, and outlines issues and standards to consider under each key factor on the form inspectors are asked to complete and return to the Sector by 15 February 2002. It also offers guidance on FOCUS recording.

INTRODUCTION

1 Although the guidance in the SSP protocol is detailed, the essence of this objective is to pilot means of inspecting the activities of employers whose work is carried out by peripatetic employees, rather than in fixed premises. Window cleaners undertake hazardous work and falls result in death and major injury to significant numbers each year. One aim of this objective is to improve control of risks from work at height.

LOCAL AUTHORITIES

2 A second aim of the objective is to build in a contribution from local authorities (LAs) to the inspection of the company's activities. In this way, by working together, it is possible a more accurate view of an employer's overall health and safety performance will be achieved, leading to more efficient and effective intervention and ultimately fewer accidents/cases of ill health. Local authorities will be the enforcing authority for work carried out within premises allocated to them by the Health and Safety (Enforcing Authority) Regulations 1998. If a company base is simply an office, the LA will be responsible also for enforcement within the office. The Sector has recently set up a liaison group with representatives of the national trade association. Two LA members have been nominated by the Local Government Association from the councils for the City of London and The Royal Borough of Kensington and Chelsea. Revision of BS 8213 is one task currently underway and work to prepare more detailed guidance to replace the aged and out of print HSE guidance on window cleaning will follow shortly.

INSPECTIONS

3 The nuts and bolts of actually inspecting will be no different in principle from any other inspection, and the only change will be in the broader planning of the inspection to include examination of off-site work practices and corresponding management arrangements for controlling work at such sites, both HSE and LA inspected. To this extent, it is an experiment and its value will include identifying what benefits this approach brings and what problems/obstacles field inspectors experience in trying to implement it, as well as giving a snapshot of how employers approach the key factors in managing peripatetic work.

4 The annual local authority circular describing possible areas for joint working with LAs does not include this initiative, as it will only apply to a tiny minority of authorities. Inspectors will have to initiate contact directly with those relevant to the firms chosen. Enforcement liaison officers should be able to offer a suitable contact.

ACCIDENT PICTURE

5 Reported accidents to window cleaners are not numerous, but are generally serious. In a typical recent year there were 5 deaths, 11 major injuries and 12 over- three-day injuries. All the deaths were from ladder falls, as were the majority of other accidents. About half the victims were self employed.

STANDARDS

6 The SSP protocol lists the key references.

REPORT COMPLETION

7 Inspectors should consider the issues in the [appendix](#) for each of the key factors in this objective. These correspond broadly to the key issues listed in the form with the protocol. The protocol also requests a narrative report. Ideally, this will cover the main findings, to amplify the form markings, and feedback on the value/difficulty of this type of approach to organisations with a peripatetic workforce.

8 On FOCUS, for each company selected, a record should be created in the usual way if one does not already exist (examination of one divisional database indicated that the great majority of window cleaning firms are not registered). For some firms, the base premises may be LA-enforced, eg if simply an office and store. Use of the client clue and/or incumbent pen picture will clarify that HSE has a legitimate interest in such premises.

9 For off-site visits, incumbent records using the applicable location type should be opened and then date closed after the visit has been input. For many sites a minor transient location will be all that is required, eg domestic buildings, exterior of LA-enforced premises and work is done from the street. Once all off-site visits and, as appropriate, base premises inspections have been completed, the base premises incumbent should be rated based on the inspector's assessment of the overall company performance.

Date first issued: 10 May 2001

APPENDIX (para 7)

Health and safety arrangements for management of window cleaners' health and safety

- Does risk assessment cover all risks to which they may be exposed or create? These will include risks arising from loading/unloading ladders and other equipment, from work at height using all types of access equipment known to be encountered.
- Are specific risks at sites identified in advance in the risk assessment (eg overhead power cables, soft ground, problematic windows and have suitable control measures

been identified and implemented?)

- Are those responsible for risk assessment given adequate information, instruction and training on risk assessment and deciding on controls? Is this supplemented by adequate health and safety assistance?
- Are health and safety responsibilities understood by those responsible and do they have time to discharge them?
- Is supervision of window cleaners adequate? What is done to check on their activities?

Arrangements for co-operation between window cleaning firm and employers whose sites cleaners visit

- Do employers at sites visited provide the firm with information on risks to cleaners or site rules they must follow?
- Do window cleaning firms tell their employees?
- Does this information go direct to the window cleaners and does the firm know this?
- Do employers at sites visited consider risks to window cleaners and provide controls, eg eyebolts for harness attachment

Training and information for window cleaners

- Are they trained and given suitable information, eg on basic safety checks before using access equipment, safe use of equipment, emergency procedures?
- Is least risky access method used and is the equipment involved used properly and maintained? What checks on examination certificates are carried out?

Agency workers

- Is the information required by Management of Health and Safety Regulations 1999 reg.15(3) given to any agency workers used?
- Are agency workers given health and safety information specific to any tasks they have to do?

Consultation with employees and safety representatives

- Are they involved in risk assessments and deciding control measures?
- Is there a safety committee?

Monitoring and review

- What steps does the firm take to monitor window cleaners?
- What use do they make of accident reports? Are adequate investigations carried out?

