

**HARLOW COUNCIL**  
**Addendum to Health and Safety Policy**  
**Working at Height**  
**Harlow Civic Centre Roof**  
**Safe System of Work**

## **General Statement**

### **Working at Height**

The Health and Safety at Work Act 1974 makes it clear that employers have a duty to take all reasonable steps to ensure the safety of their employees. The Management of Health and Safety at Work Regulations 1999 places a further duty on employers to assess the risks to the health and safety of employees.

What does this mean in practice? As an employer Harlow Council, or more likely an individual Service, must consider health and safety risks associated with the work activities that are being undertaken. As a result of the assessment it will be possible to reduce any identified risks to an acceptable level by the introduction of suitable and sufficient control measures.

This safe working procedure contains general information to help reduce the risks from Working at Height. It is not intended to replace the requirement for individual Services to consider this issue in more detail.

### **General Safe Working Procedure**

The Working at Height Regulations 2005 make it clear that if work at height is necessary, safe systems of work should be established, proper planning and organisation should take place, and appropriate equipment should be chosen and used.

Falls from height are the most common cause of fatal injury and the second most common cause of major injury to employees.

### **GENERAL**

1. The two main hazards are employees falling when working above ground level and objects falling from a height.
2. There is no minimum height that should be considered safe. The most important consideration is the potential for harm rather than the distance someone or something might fall.
3. Employers should identify all activities that require working from height and carry out a risk assessment.
4. The assessment will initially be used to determine the most appropriate means of getting access to the point of work e.g. scaffolding, mobile tower, mobile elevated work platform (MEWP) or ladder etc.
5. Whatever method is used to gain access the assessment must identify suitable control measures to minimise the risk of people falling or items being allowed to fall.
6. Adequate information, instruction and training should be provided to everyone involved.

## **1. Ladders**

Schedule 6 of the Work at Height Regulations lays down the general requirements relating to the use of ladders and Working at Height.

Ladders should only be used for work at height when the risk assessment has determined that the use of other means of access, such as mobile towers or mobile elevated work platforms (nifty lift), is not justified because of the low risk. The assessment should also demonstrate that their use is of short duration and that existing features of the site cannot be altered. See working at height use of ladders and steps for full details of risk assessment and requirements.

## **2. Civic Centre**

For the purpose of working at height on the roof of the Civic Centre, a purpose built Latchway Mansafe System was fitted in May 2003, access is gained through two roof top access points, (doors to lower roof and trapdoor to upper roof). Anyone accessing the roof must be appropriately trained and equipped wearing the correct fall arrest harness. Only trained personnel, contractors or other persons trained to working at height, and in the use of the fall arrest equipment, will be allowed access. Anyone else should not be allowed access to the roof, even if supervised by an appropriately trained member of staff.

## **3. Legal position**

This policy document refers to working at height within or upon the open roof area of the Civic Centre, Harlow Council office buildings, and the procedures detailed here only apply to the Civic Centre. For all other authority owned buildings, although the arrangements for controlling any working at height activity at these locations may be similar, they will require their own bespoke safe system of work and risk assessments. This safe system of work applies only to the Civic Centre, Harlow.

What does this mean in practice? Although the guidance here is sound it applies to a site specific location and cannot be transferred to another council owned property.

As an employer Harlow Council, or more likely an individual Service, must consider health and safety risks associated with the work activities that are being undertaken. In this instance working at height on the roof of the Civic Centre, as a result of the assessment, it will be possible to reduce any identified risks to an acceptable level by the introduction of suitable and sufficient control measures. In this case relevant working at height training and the use of a fall arrest system.

This safe working procedure contains general information to help reduce the risks from Working at Height at the Civic Centre.

### **3.1 The law**

The Work at Height Regulations, require employers to make specific provisions for emergency planning:

Organisation and planning – Regulation 4

- (1) Every employer shall ensure that work at height is properly planned
- (2) Planning of work includes planning for emergencies and rescue

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In addition, the following regulation requires that all activities, including rescue, must be carried out by competent, persons:

### **Competence - Regulation 5**

Every employer shall ensure that no person engages in any activity, including planning, and supervision in relation to work at height unless [they are] competent to do

## **4. Risk assessment and managerial arrangements**

The Facilities Manager for the Civic Centre retains full responsibility for the safety of all persons entering the roof area. The Facilities Manager, (Nominated Person), is responsible for all aspects of safety, inspection, training, review and management of the safety systems in place there.

No person(s) should be allowed access to the roof whether to carry out work or otherwise, unless they have been appropriately trained and are equipped with and wearing the appropriate PPE and fall arrest harness.

No one should work alone on the roof.

Only the appropriate fall arrest harness device should be worn when on the Civic Centre roof. Latchway 20M Personal Rescue Device (PRD).

The rescue plan for the Civic Centre roof specifically asks that the Latchway 20M PRD be worn, any failure to do so, will complicate any rescue efforts and would require the intervention of the emergency services (Fire/ Ambulance).

The relevant risk assessment for working on the roof of the Civic Centre roof is located on the Health and Safety Kaonet under Generic Corporate Risk Assessments and is titled Generic Corporate Risk Assessment – Working at Height – Civic Centre Roof, as is the Safe System of Work.

Whilst both these documents sit within the Health and Safety Kaonet for easy reference, the responsibility to maintain, up keep, review, amend, change, develop, alter, deliver, educate, train, indeed all aspects related to safety and safe operations on the Civic Centre roof, remain the responsibility of the Facilities Manager (Nominated person) for the Civic Centre.

The Health and Safety Team will provide professional advice and assistance in all aspects of safety and working at height, to the Facilities Manager as and when required.

## **5. Routine testing and maintenance**

The Latchway Mansafe Fall Arrest System located on the roof of the Civic Centre, must be inspected examined and certified as safe for use.

This applies equally to all fall arrest harnesses (PRD or otherwise), arrestor lanyards, karabiners, latches and couplings.

This examination must be carried out by a suitably qualified or competent person. In all cases reference should be made to the manufacturer's user manual/maintenance log.

## **5.1 Examination and certification**

The fall arrest system, associated harnesses and PPE will be examined periodically.

- Latchway Mansafe System (located on upper and lower roof area) – Annually
- Latchway 20M PRD Harness – Annually
- Other Fall Arrest Harnesses – Annually
- Arrestor lanyards, latches, couplings – Annually

In all cases end of useful life recommendations as defined by the manufacturer, for use of the equipment must be observed. Fair wear and tear will probably mean the useful life expectancy of equipment is extended, whilst frequent or heavy use may require the equipment to be replaced at an earlier stage.

For example the useful life recommendation for the Latchway Mansafe System if fully maintained is 25 years. The useful life expectancy of the Latchway 20M PRD Harness is 10 years and applies to all other fall arrest harnesses as well.

Every Latchway Mansafe System should have a maintenance log where annual inspection results are recorded, as would be any repair, upgrade or maintenance tasks carried out. Each Fall Arrest Harness (PRD or otherwise), should also have an individual maintenance log again showing the annual inspections, upgrades, or maintenance tasks carried out upon them.

## **5.2 Un-certificated use of equipment**

The use of un-certificated equipment is not recommended and could be life threatening. A piece of equipment will be considered to be un-certificated if it is over 12 months old (check date of manufacture in maintenance log book) and it has not undergone an annual inspection by a suitably qualified or competent person.

Any uncertified equipment found on site should be removed immediately and surrendered to the Health and Safety Team who will arrange for it to be disposed of or destroyed.

## **5.3 Certificate of Conformity**

Only equipment certified as BS EN will be used when working at height –

- BS EN 354, Personal protective equipment against falls from a height — Lanyards
- BS EN 355, Personal protective equipment against falls from a height — Energy absorbers
- BS EN 358, Personal protective equipment for work positioning and prevention of falls from a height, belts for work positioning and restraint and work positioning lanyards
- BS EN 361, Personal protective equipment against falls from a height — Full body harnesses
- BS EN 362, Personal protective equipment against falls from a height — Connectors
- BS EN 363, Personal protective equipment against falls from a height — Fall arrest systems
- BS EN 364, Personal protective equipment against falls from a height — Test methods
- BS EN 365, Personal protective equipment against falls from a height — General requirements for instructions for use, maintenance, periodic examination, repair marking and packaging

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Where there is no certificate of conformity (BS EN mark) or where there is no maintenance log book, or the equipment has not been examined and checked, use of that equipment should be avoided.

### 6. Records and reporting

The maintenance and use of log books will be kept up-to-date with the equipment and PPE to which they refer and be readily available for inspection.

The risk assessment and the Safe Systems of Work will be readily available at the premises to which they relate.

A list of authorised persons and authorised contractors, competent and trained to carry out work or inspection of the Civic Centre roof, will be maintained by the Facilities Manager.

Permits to work on the Civic Centre roof will be issued through the Facilities Manager. Remember no one should have access to the roof unless a permit has been completed.

All accidents, near misses, hazardous incidents or dangerous occurrences whilst on the roof must be reported to the Health and Safety Team through the established channels.

In the event of any employee suffering a fall from height or having to deploy their Personal Rescue Device (PRD) a statutory report will be required under RIDDOR\*.

#### **\*The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995**

All RIDDOR reports will be sent to the HSE by the Health and Safety Team who must be informed as soon as possible.

### Revision History

Revision date	Previous revision date	Summary of Changes	Changes marked
NOV 2013	None	Original Draft document	
MARCH 2020		Grammatical & layout	

**Reference**

The Health and safety at Work Act 1974

The Work at Height Regulations 2005

The Lifting Equipment and Lifting Operations Regulations 1997

The Management of Health and Safety at Work Regulations 1999

The Personal Protection and Equipment Work regulations 1992

BS 7883:2005, Code of practice for the design, selection, installation, use and maintenance of anchor devices conforming to BS EN 795.

BS 8437:2005, Code of Practice for selection, use and maintenance of personal fall protection systems and equipment for use in the workplace.

BS 8454:2006, Code of Practice for delivery of training and education for work at height and rescue.

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