

Work at Height

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Policy Statement

Summary

This policy procedure outlines the Force's responsibility when undertaking work at height.

The Force undertake many activities that require working at height varying from the use of kick stools in an office environment to protestor removal from trees all of which have varying levels of risk.

One factor that is not always considered is that a fall from a relatively small height can result in serious injury; including from objects such as hard surfaces, sharp objects such as railing and glass and water hazards. In the UK there are around 40 fatal work place accidents per year attributed to falls from height of which approximately 15% are from falls less than head height. In addition to this there are around 3000 major injuries (e.g. broken limbs) of which two thirds are from falls less than head height.

The aims of the policy are to describe:

- Responsibilities of those involved;
 - The approach to risk assessment; and,
 - The equipment options and training available.
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Scope

This policy applies to all police officers and police staff.

Principles

Working at Height

- Working at height, describes any workplace situation where a person could fall and injure themselves or others if the precautions required by the regulations were not taken.
 - This covers not only potential falls from the normally elevated working positions, but also the risk of potential falls to below ground level.
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Collective/ Personal Protection

- Collective protection is equipment that does not require the person working at height to act for it to be effective. Examples are permanent or temporary guardrails, scissor lifts and tower scaffolds.
 - Personal protection is equipment that requires the individual to act for it to be effective e.g. using a safety harness.
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Responsibilities

Introduction

- Under the Health and Safety at Work, etc. Act 1974, the Force has a duty to ensure, so far as is reasonable practicable, the health and safety of all employees while at work.
 - Under the Management of Health and Safety at Work Regulations 1999, the Force has a duty to undertake suitable and sufficient risk assessments, including those associated with working at height.
 - The WAHR place duties on employers, the self-employed, and other persons that controls the work of others (e.g. Facilities Management or building owners who may contract others to work at height).
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Supervisors/Line Managers

Responsibilities

Whilst the line manager will usually be responsible for supervising the activity for some more complex operational activities they may not be competent to do so. Where this is the case these responsibilities will fall to the supervisor of the activity, which also includes those situations where a supervisor is working remotely away from the incident, for example in a police station, control room or multiagency hub.

Supervisors/Line Managers are responsible for:

- Ensuring appropriate risk assessments are completed for the activities undertaken, including any individual circumstances. This includes both for planned matters and spontaneous “in progress” incidents such as working at height searches involving suspects or for evidential purposes. Supervisors/Line Managers are required to discuss with the individual in advance the circumstances of the proposed working at height related activity and undertake a NDM assessment as to whether the proposed work is necessary and proportionate to achieve the required objective.
 - Ensuring that other tactical options to mitigate against the necessity to work at height are considered and potential risks highlighted on pages 4-6 are discussed with the officer/staff member prior to the activity.
 - Ensuring staff have adequate information, instruction and training. For simple tasks this may be a toolbox talk.
 - Communicating the details and how to comply to the risk assessment to those affected – this may include other third parties.
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Employees

Responsibilities

There is a general requirement under the Health and Safety at Work, etc. Act 1974 for employees to comply with the safety measures put in place by their employers.

Employees are responsible for:

- Co-operating with employers and others to ensure that work can be carried out safely.
 - Ensuring that they understand the hazards in the workplace and comply with the safety rules and procedures.
 - Using any equipment supplied in accordance with the employer's instructions and training.
 - Not tampering with or modifying the equipment.
 - Ensuring that the employer is notified of any medical condition that may affect the safety of working at height.
 - Conducting themselves in a manner that does not endanger themselves or others.
 - Reporting any defect or action that could lead to a dangerous occurrence.
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Risk Assessment

Assessment

- A detailed assessment of every Work at Height activity would be a major undertaking and may not always be possible for operational police officers in an emergency.
 - The rapidly changing circumstances of operational incidents mean a certain amount of reliance is placed on operational staff to undertake dynamic risk assessments.
 - For common, short duration tasks, a Generic Risk Assessment is documented on the Health and Safety Intranet site. For longer/planned tasks which are not covered by these, a specific risk assessment should be documented and where necessary supported by a detailed method statement.
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Approach to Managing Risk

- The Force adopts the Health and Safety Executive step by step process when planning work at height activity and will prioritise collective protection before personal protection.
- The Force also provides a directive to assist officers in selecting the appropriate method of working at height search as follows:

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Anticipated type of search:	Minimum response:
1. Short duration searches that will not involve the disturbance of significant amount of insulation or other obstacles.	Available to all staff with the additional awareness training and proper work equipment.
2. Longer duration detailed searches in which there will be disturbance of significant amounts of insulation or other obstacles.	LSOs who have additional PPE, training and work equipment.
3. Complex searches – all large industrial premises, where the height of a fall is over 2m and/or the extent of the loft is greater than that of a typical dwelling house.	After consultation with a Working at Heights Supervisor, either deploy Working at Heights specialist search team or LSOs.

- Further advice on the types of Hazards to be considered during the assessment can be found in the Work at Height Hazard guide and listed here, this is not exhaustive:
 - Is there suitable safe access?
 - Is there adequate edge protection in the form of handrails?
 - Are there fragile materials which a person could fall through Including asbestos, boarding, joints, glass?
 - Are there any trip hazards or blind drops?
 - Is there adequate lighting either natural or artificial?
 - Is there a risk of being pushed off or through a surface by a subject?
 - Are there any sloped or angled surfaces?
 - What is the surface below your work at height area? Is it hard ground, glass, spiked matter such as railings, any electricity or communications wiring, or water related such as swimming pool, river, canal?
- Police Officers and staff must assess whether proposed working at height activity can be avoided, including by way of other tactical options depending on the circumstances including but not limited to: containment and negotiation if relating to a sought subject, reconnaissance by way of police air asset including helicopter and drone (the force operates a caged Elios drone that can be flown within buildings with low risk of collision, ideal for confined spaces, building search, loft access, dangerous or contaminated places and it is equipped with thermal camera and LED lighting,) heat source assessment through helicopter or handheld thermal imaging. Tactical option availability should be sought through the Force Duty Officer via telephone. The overarching power in law remains Article 2 ECHR (The Right to Life) and officers/staff should not undertake activity which places themselves or

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others, including suspects, in danger of death or serious injury.

- Before undertaking any planned or spontaneous working at height activity, Police officers and staff must liaise with their supervisor/line manager to undertake a NDM assessment of the activity, considering whether this is necessary and proportionate towards the required objective. If the officer or staff member is in possession of a Bodycam, this liaison should be recorded on the Bodycam.
 - When police work at height activity is required on building sites or sites under renovation or in state of disrepair (e.g. abandoned factory) reasonable attempts should be made to contact the site manager or land owner so that officers can be made aware of hazards as part of their NDM of the proposed task
 - When police work is required where there is a risk of falling into water, whether the officers themselves or a subject, life preservers should be made available, including by way of request to West Yorkshire Fire & Rescue Service. Officers and staff should consider what protective equipment they need to remain wearing and what may be able to be safely discarded to lessen their weight in the event of a fall into water.
 - When it is known or suspected (low threshold, 2 to 3 / 10 suspicion) that an officer would be required to pass over fragial material which could cause a fall from height, the activity must not take place unless platforms, coverings or other similar means are provided to adequately mitigate against the perceived risk. Each district does possess such equipment and advice can also be obtained through the duty POLSA or SSG search team leader or the Force Duty Officer via telephone.
 - Working at Height trained supervisors and specialists can be contacted Monday to Friday day shift at Public Order Training, Carr Gate.
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Use of Ladders

- Where working at height cannot be avoided and access cannot be facilitated through permanent structures, ladders/steps are a sensible and practical option.
 - Their use should be restricted to short duration work (maximum 30 minutes) where the activity is low risk and requires minimal equipment to perform the task e.g. a drill.
 - Where these criteria cannot be met, alternative equipment should be selected.
 - The ladder inspection checklist is available.
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Contractors

- Contractors working on West Yorkshire Police premises will provide their own risk assessments and safe systems of work.
- They will be provided to the department appointing the contractor, usually Assets and Logistics – Estates, who will monitor the use and provision.

Training

Summary

- Adequate information, instruction and training must be provided to all employees involved with Working at Height.
 - The nature of this will vary from formal training courses delivered to specialist groups such as:
 - Firearms teams;
 - Specialist Support Group search teams;
 - Hostage Negotiators; and,
 - Technical Support Units.
 - This will include the use of specialist equipment such as rope access/fall arrest equipment and undertaking evacuation from at height.
 - For groups who use ladders/step ladders on Force premises such as Driver Handy persons, Vehicle workshops and Estates Team, Force Training School provide ladder training courses.
 - For other lower risk tasks, such as the use of step stools, a local toolbox talk can provide the relevant information.
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Additional Information

Compliance

This policy complies with the following legislation, policy and guidance:

- Health and Safety at Work Act etc. 1974
 - Provision and Use of Work Equipment Regulations 1998
 - Working at Height Regulations 2005 (WAHR)
 - Data Protection Act 2018
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Further Information

Methods to control risks are often based simply on common sense and general good practice. However, there are a number of information sources that can be utilised as a further means of assessing existing controls or providing guidance on additional controls.

Further guidance in relation to this policy can be sought from:

- Working at height Generic Risk Assessment
- Process for District Staff undertaking Loft Searches
- Equipment provided for Loft Searching
- Work at Height Hazard guide
- Work at Height Equipment guide

Force Health and Safety Department:

- The Force Health and Safety advisors can provide additional support and expert guidance where necessary. They can be contacted directly via telephone.

Health and Safety Intranet site:

- The Intranet site includes guidance and advice on risk assessments when working at height.

Health and Safety Executive (HSE) Internet site:

- The following guidance is freely available to download from the HSE website:
<https://www.hse.gov.uk/work-at-height/index.htm>
 - Working at Height 'a brief guide':
<https://www.hse.gov.uk/pubns/indg401.pdf>
 - Safe Use of Ladders:
<https://www.hse.gov.uk/pubns/indg455.pdf>
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