**Process: Work at Heights**

Purpose

South Regional TAFE (the college) is committed to providing and maintaining a safe work environment.

Under the Work Health and Safety Act 2020 (WA) (WHS Act), the college holds a primary duty of care to ensure, as far as reasonably practicable, that the health and safety of workers and others is not put at risk by work conducted as part of its business or operations.

Scope

This process has been developed in accordance with the Safe Work Australia [Code of Practice: Managing the risks of falls at workplaces](https://www.safeworkaustralia.gov.au/doc/model-code-practice-managing-risk-falls-workplaces) and applies to workers who may be exposed to the potential of falling from height. This includes work carried out using various forms of portable structures such as elevated work platforms, ladders and scaffolding or work around unguarded holes, fragile/brittle surfaces or open edges etc.

What is work from height?

Work at Height (*WHS General Regulations 2022*, r.78) does not define a ‘specific height’ to classify general activities as work at height, however, it includes a fall from one level to another that is reasonably likely to cause injury to the person or any other person.

The onus is on both workers and supervisors to minimise the likelihood of a fall from any height.

Note that construction work that involves the risk of a person falling more than 2 metres is defined as high-risk construction work (*WHS General Regulations 2022*, r.291).

Roles & Responsibilities

**The Person Conducting a Business or Undertaking (PCBU)**

Eliminate the risk of falls in the workplace, or if that is not reasonably practicable, minimise those risks so far as is reasonably practicable, including:

* ensuring, so far as is practicable, that any work involving the risk of a fall by a person from one level to another is carried out on the ground or on a solid construction.
* provide safe means of access to and exit from the workplace and an area from which a person could fall, such as a platform or scaffolding, and
* if it is not reasonably practicable to eliminate the risk of a fall, minimise the risk of falls so far as is reasonably practicable by providing adequate protection against the risk, including by providing a fall prevention device if it is reasonably practicable to do so, or if not, a work positioning system or if not, a fall arrest system.

**Officers**

Officers, such as Directors, have a duty to exercise due diligence to ensure that the PCBU complies with the WHS Act and WHS Regulations. This includes taking reasonable steps to:

* gain an understanding of the hazards and risks associated with the operations of the college, and
* ensuring the college uses appropriate resources and processes to eliminate or minimise the risks of falls from one level to another that are likely to cause injury.

**Workers**

* have a duty to take reasonable care for their own health and safety and take care to not adversely affect the health and safety of other persons
* comply with reasonable instructions as far as they are reasonably able and cooperate with reasonable health and safety policies or procedures that have been notified to them.
* use or wear provided PPE so far as they are reasonably able to and in accordance with the information and instruction and training provided.

**Other persons at the workplace i.e. visitors**

* take reasonable care for their own health and safety and take care to not adversely affect the health and safety of other persons
* comply so far as reasonably able with reasonable instructions given by the college or workers to allow compliance with the WHS Act.

Training Competency & Records

All workers who are required to work at height, whether that work requires the use of a harness or not, must hold a Work Safely at Heights qualification (RIIWHS204E) (or equivalent industry training e.g. AHCARB319 - Use arborist climbing techniques) from a nationally accredited Registered Training Organisation (RTO).

If an older Work Safely at Heights unit is presented, then evidence of refresh training within the last 5 years is to be provided.

Further, for work at height over 2 metres, a minimum of two people must always be present.

It is highly recommended that the person approving a work at height permit, has also completed the relevant training. Other training requirements may be identified via risk assessment etc.

Contractors are required to upload their qualification to the college’s contractor management portal (or similar for regional campuses).

Permit to Work

The college has in place a [Work at Height Permit](file://bun-a-fs01.swit.local/dfs/Bunbury/swrcbs/Facilities%20%26%20Services/04/Forms/FAS04%20F03.doc) form that is to be submitted along with the JSA and/or SWMS. See below for further information.

For planned works, the form is to be submitted a minimum of **2 business days** prior to commencement of the work at height activity.

Approval to work at height must be obtained from the Manager Facilities and Services, Campus Manager, Regional Campus Manager, or another college authorised team member. The permit is retained by the college whilst the work is in progress.

A permit may not be required for the following activities:

* Using an A-frame ladder up to 2 metres, or
* Using a platform ladder up to 2 metres, or
* Working from a fixed scaffold that confirms to AS/NZS 4576 Guidelines for scaffolding, or
* Working from a mobile scaffold less than 2 metres that confirms to AS/NZS 4576 Guidelines for scaffolding, or
* Working on a roof which has permanent fall prevention. i.e., permanent guardrails or edge protection like parapet walls that are at least 900mm in height.

Persons conducting work must still undergo the Risk Management process and consult with stakeholders to complete a documented risk assessment detailing the necessary controls required to eliminate or minimise the risks.

Risk Management

The worker/s and supervisor must conduct a risk assessment by completing a Job Safety Analysis (JSA) Form and/or a Safe Work Method Statement (SWMS) (where the work is defined as High-Risk Construction Work and involves a risk of a person falling more than 2 metres then a SWMS is needed instead of a JSA).

Before work commences, all workers new to the task should be briefed on the processes to be followed and the need to observe all safety requirements. This process ensures that all hazards are identified, and appropriate procedures are documented and implemented to effectively manage and control those risks.

The risks associated with work at heights activities, are to be controlled by the hierarchy of control. It is important to constantly monitor and review control measures to ensure they continue to prevent or control exposure to risks or conditions.

Where it is reasonably practicable to eliminate the work at height hazard, it must be eliminated. If that is not possible, then a safe system of work that provides adequate protection from falls must be implemented. This includes arranging:

* a fall prevention device – e.g., handrails, hard barricading, scaffolding, elevating work platforms (EWP which must have its own rescue descent device).
* if that is not possible, a work positioning system – e.g., an industrial rope access system which would include the following components: anchor points, main & safety rope lines, safety harnesses, descenders, belay devices, fall arrest devices, back up devices, connectors & shock absorbing lanyards.
* if that is not possible, a fall arrest system – e.g., plant or material that is designed to safely stop a worker falling an uncontrolled distance and to reduce the impact of the fall. This includes an industrial safety net, a catch platform, a safety harness with a shock absorbing lanyard.

A combination of these controls may be necessary to sufficiently minimise the risk.

A copy of the JSA and/or SWMS is to be held at the job whilst the work at heights activity is being undertaken. Once the work has finished, the JSA and/or SWMS is retained with the Work at Height Permit and saved to Content Manager.

Selecting Appropriate Equipment

All height safety equipment should be selected based on the risk assessment and task being performed as outlined in Safe Work Australia [Code of Practice: Managing the risks of falls at workplaces](https://www.safeworkaustralia.gov.au/doc/model-code-practice-managing-risk-falls-workplaces) and in line with AS-NZS 1891.4-2000- Industrial Height Safety Equipment.

If the requirement for a second person is identified in the risk assessment, they should be present at all stages of the fitting, attaching and use of the fall protection systems. Furthermore, the second person must be fully trained and competent in working safely at height and have all required PPE, even if they do not intend to work at height. This is in case of an emergency or urgent need for assistance.

The PCBU that provides working at heights equipment must ensure that the equipment is suitable for its intended use, inspected and approved before use to ensure it is in good working condition. Defective or damaged equipment should be removed immediately and repaired or replaced.

Rescue Plan

A work at height rescue plan must be documented and attached to the Work at Height Permit whenever fall arrest systems are in use.

A PCBU which provides a fall arrest system as a measure to control risk, must establish emergency and rescue procedures. For example, a contractor performing work at height activities at a college site, must have their own rescue plan established. Similarly, if a college worker performs work at height, the campus must have its own established rescue plan.

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| **Requirement** | **Topic** |
| Specific Requirements | * All harnesses must have a suspension trauma strap to allow the suspended worker, if conscious, to stand up in their harness and to relieve the pressure being applied to the arteries and veins around the top of the legs.
* Emergency contact information must be available.
* The emergency procedures must be tested to determine their effectiveness.
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| Additional Considerations | * Communication methods available.
* The type of body-holding device in use.
* The person may be unconscious or injured and unable to assist in their own rescue.
* The steps the rescue team will take to ensure their own safety.
* Whether the injured person can be raised or lowered.
* The rescue equipment and the workers who are familiar with its safe use.
* The possible effects of suspension trauma if rescue is delayed.
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Relying on emergency services is not a rescue plan. It is not their duty to rescue a fallen worker, however they still must be alerted as soon as someone falls.

Roof Safety

All roofs with a fixed height safety system, require a documented roof safety survey or similar. This document outlines the safety systems in place and is to be used as a general guideline for workers when accessing roof areas. Systems installed can include walkways, fixed anchor points, static lines etc.

Permanent or long-term fixed anchorage points must be signed with the following information as required by AS/NZS 1891.4

* Name of installer and installation date, or if an existing structure has been certified, the name of the certifier and the certification date.
* The highest purpose category for which the anchorage is suitable (see AS/NZS 1891.4 Table 3.1).
* The ultimate strength rating, if less than 15 kN. In this case, words must be added to the sign to the effect that the anchorage is to be used only for fall restraint scenario and not to be used for fall-arrest.

The maximum number of people (never to exceed two) who are permitted to be connected to the anchorage point at any one time.

Elevating Work Platform

Elevating work platforms (EWP) include any type of platform, including boom, telescopic and scissor.

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| **Requirement** | **Topic** |
| Specific Requirements | * Workers operating an EWP with boom lengths exceeding 11 metres, must have a current high risk work licence. Minimum of two workers at all times.
* The platform should only be used as a working platform and not as a means of access to and egress from a work area unless as identified as part of a rescue plan.
* All workers operating a boom or telescopic type platform, must wear a body harness and be tethered to the platform, with the shortest lanyard possible to allow the worker to complete the desired work. A harness is not required to be worn in a scissor lift type platform unless identified by risk assessment.
* Consider the ground conditions. Unless designed for rough terrain, the platforms should be used on a solid, level surface only.
* Mandatory pre-use inspections must be completed, and records retained. A pre-start logbook is to be maintained on each EWP. The operator must check the currency of the EWP before use. A copy of the certificate must be always held in the EWP.
* Where an EWP is being operated near power lines exclusion zone distances must be maintained and a spotter assigned. Additional controls such as isolation and use of protection such as insulators must be put in place. ‘Tiger tails’ (powerline indicators) must be considered as a minimum.
* A traffic management plan may be required where EWPs are used on a roadway / road shoulder where interaction with traffic is likely. If an EWP encroaches onto a laneway, the lane must be diverted around the EWP, if sufficient room. If the laneway must be closed down to one lane, traffic management will be required.
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Ladders

The following applies to the selection and use of ladders.

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| **Requirement** | **Topic** |
| Portable Ladders | * The type of ladder used, shall be selected based on the task involved, for example, ladders for electrical use must be non-conductive.
* They are intended for temporary use only.
* They should be inspected prior to use. If damaged, tag out as unserviceable and either repair or destroy. Store ladders to avoid damage and deterioration.
* Where possible, platform type ladders that have a working platform should be used in preference for non-platform types.
* Straight ladders should be tied off where possible to prevent movement during use. If necessary, have a second person ‘foot’ the base of the ladder until it is tied or fixed in place.
* Generally, the distance between the ladder base and the supporting structure (wall) should be approximately 1 metre away for every 4 metres of working ladder height (1 out, 4 up).
* When used for access or egress to a roof, platform, or similar, the ladder should extend at least 900mm above the stepping off point. Extension or single ladders are a means of access to or egress from a work area. They are not to be used as a work platform.
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| Fixed Ladders | * Constructed and installed in accordance with AS 1657 Fixed Platforms, Walkways, Stairways and Ladders.
* Visibly checked prior to use.
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Scaffolding

The erection and dismantling of all scaffolding are to be undertaken in accordance with the requirement of AS/NZS 1576 Scaffolding General Requirement and AS/NZS 4576 Guidelines for Scaffolding.

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| **Requirement** | **Topic** |
| Specific Requirements | In addition to the general JSA requirements and compliance with the listed Standard, the following items are to be included in the risk assessment when conducting scaffolding activities:* Workers shall hold the appropriate high risk work licence for the type of scaffold being erected or dismantled.
* Scaffolds shall not to be used unless written confirmation from a competent person is attached stating that construction of the scaffold has been completed and it is safe to use.
* All components should be inspected prior to use. If damaged, tag out as unserviceable and either repair or destroy. Store to avoid damage and deterioration.
* Scaffolds must be inspected at least every 30 days by a competent person.
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Scaffold activities related to student delivery are managed by the relevant learning area. This includes inspection evidence and JSA’s etc.

Falling or Dropped Objects

Objects falling from heights can place those working near or below at risk. Consideration shall be made for plant, equipment or other objects required for use at heights.

Where work at height requires objects such as tools and equipment, the following shall be required:

* Safe means of raising and lowering plant, materials and debris in the place of work.
* Edge protection to be used.
* Provision of appropriate personal protective equipment.
* Barrier to close off the work area underneath or other means to prevent workers working or pedestrians passing by underneath.
* Supervision of the area beneath.

Maintenance and Inspection of Equipment

The college shall ensure the following:

* A competent person inspects fall protection equipment at least six monthly and certifies that it is in good, correct, and safe condition.
* A register of all personal fall protection equipment must be kept as per AS/NZS 1891.4 Industrial fall-arrest systems and devices – Part 4: Selection, use and maintenance.
* Equipment must be visually inspected prior to, and after, every use to ensure integrity.
* Permanently fixed anchorages must be inspected by a competent person at not more than six-month intervals. They must also be inspected by an authorised competent person every 12 months and a certificate issued to indicate that the equipment is safe to use.
* Ladders will be visually inspected every 12 months, and an inspection tag affixed.
* Equipment must be stored in an appropriate, designated storage area containing instructions on care, fitting and maintenance of equipment.

If equipment or anchorages require maintenance or are unserviceable, they must be appropriately tagged and removed from use.

Documentation & Record Keeping

The following documentation must be maintained by all areas with control over work at height:

* The location of all working at heights access points.
* Training and competency records.
* Work at heights permits and risk assessments.
* Inspection reports of height safety equipment and systems.
* All hazards or incidents associated with working at height must be entered into the colleges safety management system.

Monitoring, Evaluation and Review

This document is required to be reviewed every three years from the last scheduled review date.

Minor updates made within this period will not be taken as a full review.

Definitions and acronyms

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| **Term** | **Definition** |
| Anchorage | A secure attachment on a structure or plant to which a fall arrest device, lanyard assembly or restraint line or lifeline can be attached. |
| Competent person | A competent person is one who has acquired through training, qualification or experience, the knowledge and skills to carry out the relevant task. |
| Edge Protection | A structural system, which may comprise of posts, rails, infill panels, mesh, toe boards and/or a combination thereof, that is designed to prevent people and/or objects from falling over an exposed edge. |
| Elevating work platforms (EWP) | Include scissor lifts and boom type elevating platforms or elevating work platforms (EWPs). An EWP may have a telescoping or articulated device with a platform basket, which is able capable of manoeuvring around obstacles or consist of a work platform that can only move up or down to raise or lower a worker or workers to a desired height to perform work. |
| Fall | A fall by a person from one level to another that is reasonably likely to result in injury. |
| Fall restraint system | A system to control a worker’s movement by physically preventing the worker from reaching a position at which there is a risk of a fall. It consists of a harness that is connected by a lanyard to an anchorage or horizontal lifeline. It must be set up to prevent the wearer from reaching an unprotected edge. |
| Passive fall prevention device | Materials or equipment or a combination thereof, that is designed for preventing falls and, after initial installation, does not require any ongoing adjustment or alteration by any workers to ensure the devices integrity. Examples include fixed or mobile scaffolds, guardrails, safety mesh, elevated work platforms and scissor lift. |
| Person Conducting a Business or Undertaking (PCBU) | The WHS Act places the primary duty of care and various other duties and obligations on a ‘person conducting a business or undertaking. This is a broad concept used to capture all types of modern working arrangements. |
| Worker | Any person who carries out work for a person conducting a business or undertaking, including work as an employee, contractor or subcontractor (or their employee), self-employed person, outworker, apprentice or trainee, work experience student, employee of a labour hire company placed with a 'host employer' or a volunteer.  |

Related documents

* Policy: Work Health and Safety
* Policy: Risk Management Framework
* Form: Work at Height Permit
* Form: Job Safety Analysis
* Form: Safe Work Method Statement
* Form: High Risk Work Rescue Plan

Relevant legislation and references

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| ***Standard*** | ***Title*** |
| *Australian Standard* | *1657 Fixed platforms, walkways, stairways and ladders – Design, construction and installation* |
| *1891 Industrial fall-arrest systems and devices* |
| *1892 Portable ladders* |
| *2550.10 Cranes, hoists and winches – Safe use – Part 10: mobile elevating work platforms*  |
| *AS/NZS* | *1576 Scaffolding General Requirements* |
|  | *4576 Guidelines for Scaffolding* |

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| ***Act or Regulation*** |
| *Work Health and Safety Act 2020*  |
| *Work Health and Safety (General) Regulations 2022*  |

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| ***Authority*** |
| *WorkSafe WA* | *Code of Practice – Prevention of Falls in the Workplace*  |