HUMBERSIDE FIRE AND RESCUE SERVICE

Service Improvement

Work at Height Policy

Owner	**Executive Director of Corporate Services**
Responsible Person	**Head of Health, Safety & Environment**
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What we must do well

How we support our communities

We value and support the people we employ

We efficiently manage the Service

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1. INTRODUCTION

Humberside Fire and Rescue Service (HFRS) recognises the hazards posed to staff who may be required to work at height, both on and off HFRS premises, when conducting our daily activities, training sessions, maintenance activities, when delivering safe and well visits or in attendance at operational incidents.

Work at Height (WAH) should be anticipated and, where appropriate, identified as a hazard, not just for operational, training, fire safety and intervention purposes but also for other activities such as works conducted by contractors on HFRS premises, vehicles and equipment.

HFRS recognises our responsibility to comply with all appropriate legislation and create and maintain a safe working environment to protect employees during the course of their duties. Appropriate steps are taken, so far as reasonably practicable, to ensure that all work at height is planned, supervised and executed safely. Training requirements are determined by the role and level of competence required. The level of supervision will depend on the risks involved and the competence and abilities of personnel.

Core Code of Ethics

HFRS has adopted the Core Code of Ethics for Fire and Rescue Services. HFRS is committed to the ethical principles of the Code and strives to apply them in all we do, therefore, those principles are reflected in this Policy.

National Guidance

HFRS has fully adopted National Operational Guidance, and this is reflected in this Policy.

2. EQUALITY & INCLUSION

HFRS has a legal responsibility under the Equality Act 2010, and a commitment, to ensure it does not discriminate either directly or indirectly in any of its functions and services nor in its treatment of staff, in relation to race, sex, disability, sexual orientation, age, pregnancy and maternity, religion and belief, gender reassignment or marriage and civil partnership. It also has a duty to make reasonable adjustments for disabled applicants, employees and service users.

3. AIM AND OBJECTIVES

The HFRS Work at Height Policy establishes the requirements and performance standards necessary to protect employees from hazards associated with work at height undertaken during their work activities, both on and off HFRS premises and whilst in attendance at incidents.

HFRS shall discharge its duties under the Work at Height Regulations 2005, with regard to work at height, by utilising the WAH hierarchy:

- Avoid,
- Prevent
- Minimise.

HFRS staff, contractors and subcontractors should only work at height when absolutely necessary.

Where there are any work activities in which there is the potential of a risk of falling that could result in injury, the hierarchy 'avoid, prevent, minimise' should be used, before any work is carried out:

- **Avoid** work at height where it is reasonably practicable to do so.
- Where work at height cannot be avoided, **prevent** falls by using either an existing place of work that is already safe or, the correct type of equipment.
- **Minimise** the distance and consequences of a fall by using the correct type of equipment where the risk cannot be eliminated.

4. ASSOCIATED DOCUMENTS

- **Equality Impact Analysis**

- **Legal references**
  - The Management of Health and Safety at Work Regulations 1999 (as amended)
  - The Work at Height Regulations 2005
  - The Lifting Operations and Lifting Equipment Regulations (LOLER) 1998
  - The Provision and Use of Work Equipment Regulations 1998
  - The Personal Protective Equipment at Work Regulations 1992

- **National Guidance**
  - NOG Training Framework Height, Structures and Confined Spaces
  - NOG Guidance Framework Height, Structures and Confined Spaces

- Risk Assessment Policy
- Atypical Workers Policy

5. DEFINITIONS AND CATEGORISATIONS

Definition of 'Work at Height' is 'A place from which a person could be injured by falling from it, including a place at or below ground level'.

Work at height covers all activities where there is a possibility that a fall from a distance is liable to cause injury.

The need for staff to work at height falls broadly into two categories

Unintentional work at height

Where staff are attending an incident and have to deal with the potential to work at height; this could be, for example:

- Above ground, below ground or open structures
- In buildings, either complete, under construction or under demolition
- At geophysical locations, such as steep ground, cliffs or excavations

Intentional work at height

Where staff are training, conducting daily activities or attending an incident with a predefined requirement to work at height; this could be, for example:

- Maintaining vehicles and property
- Working on an aerial engine decking or platform
- Performing a rescue of a person trapped at height
- Working near a fragile surface

When essential, work at height can be achieved in various ways:

Method	Description
Ladders	Ladders mainly used for short duration tasks. Ladders vary in length and are usually made from aluminium using a riveted and trussed construction. Double or triple extensions are commonly used.
Aerial engines	Aerial Rescue Platform (ARP) and Aerial Ladder Platforms (ALP): These engines combine the main features of Turntable Ladders (TL) and Hydraulic Platforms (HP) on a single engine. A combination of main, telescopic and tip booms, along with an associated rescue cage.
Working platforms	A working platform is any platform that can be used as a place of work or as a means of access to or egress from a place of work at height (aerial engines fitted with a cage are deemed a working platform). Working platforms can also include any place of work on a scaffold, cradle, mobile platform, trestle, gangway, gantry or stairway. All working platforms should be properly supported and provided with guard rails and barriers set at an appropriate height. Working platforms must be used in accordance with manufacturer's instructions.

Rope access and rope rescue	Rope access and rope rescue can be achieved using a variety of systems and with many types of equipment. Systems can be used in isolation or in conjunction with other work at height equipment, including working platforms and aerial engines.
Specialist wire systems	HFRS do not utilise these systems, they are generally only used by nationally accredited urban search and rescue (USAR) teams or, in some cases, specialist rope rescue teams. The line access and casualty extrication equipment (LACE) used by USAR teams usually involves wire winches, rather than fabric rope systems, in circumstances where there is an increased risk of damage, such as in a collapsed structure or confined space environment.
Collective fall protection systems	Collective protection is equipment that does not require the person working at height to act for it to be effective. i.e. collective protection offers effective protection to more than one person. Where practicable, collective fall protection should always take precedence over personal protective equipment (PPE). An example of collective protection is a guard rail.
Personal fall protection systems	Personal protection is equipment that requires the individual to act for it to be effective. An example is putting on a safety harness correctly and connecting it, with an energy-absorbing lanyard, to a suitable anchor point.

6. WORK AT HEIGHT ACTIVITIES

All work at height activities undertaken should be risk assessed, properly planned, appropriately supervised, and carried out in a manner that is reasonably practicable and safe.

Where work at height cannot be avoided and is undertaken by contractors or sub-contractors on HFRS premises, a permit to work system will be utilised, following the acceptance of method statements and risk assessments that are deemed suitable and sufficient. Planning of work requires the inclusion of planning for emergency situations and rescue.

Whilst HFRS operational staff are in attendance at operational incidents, they must have the ability to be reactive, and their decision making process must consider a suitable rescue plan.

7. WORK AT HEIGHT TRAINING

HFRS staff who may be required to work at height must be informed of the risks and receive training appropriate to their role.

HFRS is committed to ensuring that its staff are adequately trained and informed of suitable safety measures to apply throughout activities that they may conduct during the course of their work, from portable ladder use at safe and well visits to specialist capabilities required on the incident ground.

Additional specialist training will also be considered, such as bridge rescue, ALP and rope amalgamation to meet the specific risk profile of the Service area.

Work at height training is required to be maintained at suitable intervals to safeguard the skills, knowledge and competencies as appropriate to the role. Maintenance of competence is the responsibility of the individual. Where an individual identifies shortcomings in their own knowledge in this area, they must make their line manager aware in order for appropriate training to be organised and delivered within a reasonable timescale.

HFRS operates three main differing levels of work at height training for operational staff to ensure safe working at height capabilities.

(Level 1) Safe Work at Height

This is the minimum standard recommended to provide a safe system of work for personnel working at height to resolve an incident.

Personnel will be able to identify and use a selection of appropriate work restraint and fall arrest equipment to work safely at height.

(Level 2) Twin Rope Access and Stabilisation

Personnel will be able to create a safe system of work and identify and use suitable anchors to create rope access and egress systems. This enables individuals to be raised or lowered vertically and to traverse structures primarily to access and stabilise casualties.

Personnel at this level should be able to meet most access and rescue requirements. A twin-rope system can create a safe system of work in order to access casualties for stabilisation and vertical rescue. Personnel descending and then the lowering of a casualty, referred to as ‘Down and Down’, is the preferred rescue option, but it may be necessary to haul up in an emergency and exceptional circumstances.

(Level 3) Technical Rope Rescue

Personnel will be able to identify, create and use suitable anchors and to construct access and egress systems. These skills enable both individuals and teams to ascend, descend and traverse while accessing and transporting casualties.

This capability is required to meet the specific demands of a complex rescue. This may include, but is not restricted to, incidents involving extreme height, lack of obvious anchor points or difficult access.

8. REDUCING THE RISK

The risks posed to staff working at height are many and varied, and work at height can be extremely complex. Consideration should always be given to avoiding the need for work at height.

Work at height and rope rescue techniques will only be undertaken if it is not reasonably practicable to perform the rescue in any other way.

Any work at height must be risk assessed, properly planned, supervised where determined as required and carried out by competent people with the skills, knowledge and experience to do the task. Planning should include the preparation for emergencies and rescue from height, and the rescue plan should be ingrained through training and practice. Staff must use the correct type of equipment for work at height, with consideration for collective measures to be applied before controls that protect only the individual, i.e. in attendance at a WAH rescue, an ALP is the first consideration.

Fitness Assessments

All HFRS operational staff are required to undertake both periodic medical examinations and fitness assessments to determine that they meet the minimum fitness and physical requirements for safe and effective firefighting.

These assessments require personal information to be provided of both current and previous injuries, medical conditions, medications and body mass, all of which have the potential to impact on the operational capabilities of the individual. There are various medical reasons why an individual may be deemed as not fit to conduct WAH. This includes where an operational firefighter’s body mass exceeds 125kg. In these circumstances the individual would be recorded as unavailable for all WAH activities that require the use of personal fall protection equipment. This ensures that the certified maximum permitted safety ratings of the personal fall protection equipment is not exceeded.

Fitness assessments are recorded on Form OCC15 which are held on file by Occupational Health and the Service Fitness Manager. Where a firefighter has been assessed as unavailable for WAH activities, the HSE team and the firefighter's line manager will be notified by Occupational Health of the non-availability, but not the cause of that unavailability. This will enable measures to be taken to ensure that the stations operational rescue capabilities are not impacted.

All HFRS employees have a responsibility to report any changes to their health that may impact on their role.

Safe Systems of Work

A Safe System of Work defines safe methods of working which eliminate the hazards or minimise the risks associated with them. Advice and guidance is provided through

training for those working at height to identify hazards and apply suitable control measures.

All work at height is to be conducted in a safe manner using approved safe systems of work and working to national operational guidance.

Rescue Plan

A rescue plan is a **pre-planned strategy or procedure**, designed to safely retrieve someone from height. It contains and provides information about the type and location of equipment that are vital in the rescue process.

Wherever staff are committed to work at height, a rescue plan should be formed and communicated to all, i.e. when supervising a development session or in command of an incident. Should there be any incidents or medical episodes, the plan can be acted on without hesitation, and the member of staff can be brought down to receive definitive care.

HFRS may not always have the ability to use a predetermined rescue plan, for someone who has fallen and is suspended in fall arrest equipment, these situations require the Analytical Risk Assessment (ARA) to be employed and the decisions and rationale recorded as soon as reasonably practicable.

Dynamic Risk Assessment (DRA)

A Dynamic Risk Assessment (DRA) is used to establish the immediate hazards, people at risk and the control measures necessary to protect those people. Having carried out a DRA and established a tactical mode, the Incident Commander (IC) will be aware of the immediate hazards, people at risk and the control measures necessary to protect those people.

Analytical Risk Assessment (ARA)

Due to the changing nature of the environment at an incident, the IC must ensure that as soon as resources permit, a more analytical form of risk assessment is carried out and, when necessary, new control measures implemented whenever the hazard or degree of risk demands it.

The purpose of the ARA is to confirm that the DRA and chosen tactical mode is correct. The form (HSE_32) must confirm any relevant ARAs or decision logs have been communicated appropriately and also identify the current incident structure.

Completed forms must be kept with Command Support for the duration of the incident and then forwarded to the Health, Safety and Environment/Operational Assurance team.

9. FURTHER INFORMATION

Additional learning packages, guidance documents and information are accessible

for all HFRS employees on the HFRS LearnPro eLearning system and the HFRS SharePoint under HFRS NOG Guidance.

10. EMPLOYEE'S DUTIES

Regulation 14 of Management of Health, Safety and Environment at Work Regulations 1999 places the following duties on all employees:

- Inform their line manager without delay of any situation which may present a serious and imminent danger.
- Notify their line manager of any shortcomings in health and safety arrangements.
- Use the equipment, safe systems of work and procedures provided by HFRS in accordance with training and instruction given.

By complying with Regulation 14 above, individuals can contribute to assist HFRS in making the workplace safer and reduce the potential for accidents and incidents.

11. MONITORING PERFORMANCE

Incidents, exercises and training events involving work at height will require monitoring through Operational Assurance (OA).

Information captured during debriefs must be recorded on the relevant OA form. This will ensure all relevant sections are made aware of any safety critical events, areas of concern or related good practices, which may then be actioned as a means of improving performance across the Service.

If you require any further guidance in relation to this policy, please contact the Health, Safety & Environment Section