

# Working at Height Procedure

## (Summary for Suppliers and Subcontractors)

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### Purpose

This procedure outlines the essential requirements and practices for all aspects of Work at Height (WaH) and related activities. If needed, divisional addendums will be added to reflect specific client or sector requirements where required. This process is connected to additional procedures, as well as the Work at Height Manual, which offers instructions and guidance in Annex B.

### Scope

Work at height means work in any place where, if there were no precautions in place, a person could fall a distance liable to cause personal injury. For example, you are working at height if you:

- are working on a ladder or a flat roof when there is a risk of a fall.
- could fall through a fragile surface.
- could fall into an excavation or hole in a floor.

All suppliers working on behalf of Mitie scope, plan, manage and deliver Work at Height (WaH) activities across many client sites from a Facilities management, Projects self-delivery or Projects professional service perspective. The contractual relationship must be clearly documented within the contract or Construction Phase Plan. All suppliers must be made aware of Mitie's WaH requirements and be assessed by Mitie to ensure compliance with Mitie's safety requirements.

For a WaH activity not specifically mentioned in this procedure or within the aligned WaH Manual, or the environment is classified as High risk, the planning and safe system of work shall be submitted to Mitie for formal approval prior to any works commencing. (Please contact - [QHSE.WAH@mitie.com](mailto:QHSE.WAH@mitie.com)). Please note these works may be subject to additional review and oversight by Mitie.

**IMPORTANT NOTE:** Unless stated the requirements of this procedure are MANDATORY deviation from these requirements is not permitted and may result in removal from site or contract non-compliance action.

## Definitions

### Categories

Work at Height (WaH) categories are defined based on complexity and risk. Below is a list of these categories, and their requirements are referenced throughout this procedure.

#### Category 1 (CAT 1)

Access equipment that forms a platform that can be used as a place of work or as a means of access and egress from a place of work other than those specially listed in other categories.

- Permissible work from ladders (subject to appropriate risk assessment and control measures) including telescopic and multi-function.
- Work from hop ups, podiums, and push arounds (low level access platforms), step ladders.
- Working on or from travelling ladders or gantries.
- Using fixed ladders, temporary or fixed walkways and gantries as access or egress.
- Use of all powered access equipment (Mobile Elevating Work Platforms - MEWPs)
- Roof works non-fragile, that do not require the use of man safe systems. (All roofs should be treated as fragile until confirmed otherwise by a competent person)
- Fragile roof with access on or over via an engineered safe walkway.
- Working from/ on a scaffold, including towers.
- Erecting and dismantling of scaffold classed as 'Standard' under TG20

#### Category 2 (CAT 2)

- Rope Access and climbing. (Arboriculture activities should follow relevant industry codes of practice)
- Working from Suspended Access Equipment.
- Work at height involving vertical or horizontal fixed fall protection systems, including activities within confined space procedures take precedence
- Roof works that are to be undertaken on or near fragile surfaces.
- Use of fixed horizontal or vertical fall protection systems.
- Working within a loft space that is not work on a safe walkway.
- Erection and dismantling scaffold by design (including edge protection) not covered by TG20:21, refer to relevant Scaffolding procedures.
- For lifting operations, the relevant lifting operations and lifting equipment procedures must be followed and will take precedence.

### Fragile Surfaces

The Work at Height Regulations 2005 define a fragile surface as “a surface, which would be liable to fail if any reasonably foreseeable loading were to be applied to it”.

A person walking (with or without tools and/or materials) is reasonable/ foreseeable loading. Under the regulations, duty holders must ensure that no one, working under their control (this includes contractors who may not be direct employees of the employer), goes onto or near a fragile surface unless that is the

only reasonably practicable way for the worker to carry out the work safely — having regard to the demands of the task, equipment, or working environment. The legal position is, “**A roof should always be treated as fragile until a competent person has confirmed otherwise**” if unsure clarification must be sought from Mitie. Typical fragile materials include asbestos cement sheets, skylights, roof lights, non-reinforced fibre cement sheets, corroded metal sheets, glass (including wired glass), slates, and tiles. The age of roof and general condition may also be consideration.

### Emergency Arrangements

All works shall have emergency arrangements to address potential incidents.

- person(s) having an accident,
- falling ill on site
- in the event of fire or other emergencies

Where there are WaH activities these should consider how a person would be assisted to an area of safety, treated at height or in the case of an evacuation being required how they will be alerted. Please note these should tie in with the existing arrangements for the premises and the site responsible person (e.g. client or building management)

### Rescue Plans (RP)

All work at height activities (excluding ladder only tasks unless used in conjunction with other equipment \must have a Rescue Plan (to address how someone would be rescued from height, i.e., fall into a net or become incapacitated) in place and referenced in the safe system or works, including risk assessments and method statements in addition to the plan template.

- I. Rescue Plans must be tested/ practiced and there may be a requirement for formal training, dependent on the controls implemented.

A suitable rescue plan must be developed or created specific to the working arrangements and environment. Please refer to the WaH Manual for further guidance.

### Scaffolds

Refer to relevant scaffolding procedures, Two main types of scaffolding:

- Independent tied scaffolds, mechanically fixed to adjacent structure.
- Freestanding scaffolds, including independent towers,

Scaffolds can be erected by a **competent person** from traditional “tube and fitting” supported by TG20 guidance or a specific design. To ensure scaffolding is designed, erected, altered, and dismantled safely, all tube and fitting scaffolding must be carried out by a recognised scaffold association member, such as the National Access & Scaffolding Confederation (NASC) or The Scaffold Association (Audited).

Inspections for all types of Scaffolds are required for,

- pre use,
- alteration or damages,
- after adverse weather, and
- every 7 days, by a **competent person**.

### Safe Working Platforms

Includes but is not limited to scaffolds/mast climbers/ mobile access platforms, proprietary low level access systems (e.g. Easi Dec)/ podium steps/ mobile safety steps/ trestles and staging / hop ups/ multi-function ladders etc in the platform mode not above 600mm, this list is not exhaustive.

<b>Suspended Access equipment</b>	All suspended access equipment whether permanently installed at premises or temporarily installed to conduct a specific task.
<b>Fixed Ladders, Walkways and Gantries</b>	Purpose designed permanent workplaces, designed specifically to provide access for operatives to conduct cleaning and maintenance tasks on a building or similar structure and for no other purpose.
<b>Travelling Ladders or Gantries</b>	Purpose-designed access, supported by or running on rails, beams, or prepared tracks.
<b>Ladders/ Steps</b>	<p>All forms of ladders and steps (conforming to Professional (BS EN131) excluding permanently fixed ladders or ladders used for utility access.</p> <p>Please note equipment conforming to BS 2037 and BS 1129 if well maintained and in good condition can still be used.</p>
<b>In date medical</b>	Where required, personnel undertaking work at height must be medically fit. Evidence of fitness may be requested by Mitie or the client.
<b>Responsibilities</b>	
<b>Employer &amp; Duty Holder</b>	<p>Shall ensure:</p> <ul style="list-style-type: none"><li>• An employer or duty holder is anyone who plans, controls, or allows work to take place at height, such as a company, building owner, or manager. The law says they must keep people safe when work is done above ground level, or anywhere a fall could cause injury.</li><li>• One of the most important responsibilities is planning the work properly. Employers and duty holders must think ahead and check what could go wrong before the work starts. They must look at the risks and decide the safest way to do the job. If the task can be done safely from the ground, it should be. If working at height is needed, they must plan how to prevent falls.</li><li>• Employers and duty holders must also provide the right equipment. This means using suitable things such as ladders, scaffolding, guardrails, or safety harnesses that are right for the job. The equipment must be in good condition and checked regularly so it does not fail while someone is using it. Using the correct equipment helps stop accidents from happening.</li><li>• Another key duty is making sure workers are trained and supervised. People working at height must know what they are doing and understand how to use the equipment safely. Employers must make sure workers are skilled enough for the task and are watched over if needed, especially if they are young or inexperienced.</li><li>• Finally, employers and duty holders must make sure the work is done safely at all times. They are responsible even if they use contractors, because the law says they still control the work. They must take reasonable steps to protect everyone involved and prevent falls wherever possible. The main aim of the regulations is simple: to stop people from falling and getting hurt.</li></ul>
<b>Contract and Operational</b>	Shall ensure all work at height activities are planned, reviewed, authorised and supported by suitable and sufficient risk assessments and method statements.

**Management Team/s**

Shall ensure that adequate resources are in place at mobilisations and throughout the works so that the requirements of this procedure and associated documents are fully implemented.

**Authorised Person**

Relevant personnel must remain informed of changes in legislation, codes of practice, industry guidance and best practice.

- All high-risk work at height activities must be formally authorised by Mitie prior to commencement.
- All safety systems of work must be reviewed and approved by Mitie to ensure they are suitable and sufficient.
- All personnel must be competent to undertake the work at height activities assigned to them. All equipment must be maintained in good condition and fit for purpose.

**Commercial Roles (QS/ Estimating)**

The hierarchy of control must be applied when planning work at height activities. Planning must ensure appropriate access methods, rescue arrangements, and equipment are in place to ensure that access safety which will include – site specific requirements, development of rescue plans, access equipment and that we have the resources to operate/ use the access arrangements selected.

**Competent Person (CP):**

Personnel must be trained and competent to undertake work at height activities appropriate to the level of risk. (Note other industry recognised qualifications may be required for example IPAF, the operation of a mobile elevated work platform.) Please see “Appointments” WaH for further detail

**Instructed Person (IP)**

Personnel must be trained and competent in the use of specific access equipment they are required to operate.

**ALL suppliers and their personnel:**

- All suppliers and their personnel: Must comply with the requirement of this procedure and its associated documents must stop work and report any unsafe work at height activities always ensure they comply with all necessary statutory and regulatory requirements.
- Must ensure they have the appropriate skills, knowledge, experience and training.
- Following pre-use inspection, any defects must be reported and the equipment taken out of service

## Authority to Work at Height

An Authority to Work at Height will be issued by Mitie once the scope of works, safe system of work, and competence of personnel have been reviewed and deemed sufficient. including emergency arrangements on site and the (Skills, knowledge, experience, and training) of those proposed to carry out the works and they are satisfied that they are sufficient.

An Authority to Work may be issued for a specific task, activity or defined period as determined by Mitie.

The issued Authority to Work must be available on site at the point of works. Issued by Mitie to the person in charge of the task.

## Inspection of Equipment

All inspection requirements must be followed in accordance with relevant standards and guidance. All access equipment (whether hired or directly owned by Mitie) shall be recorded appropriately and be formally inspected by a fully trained and competent person. Each inspection record must include the date of inspection, outcome, and next inspection due date, the result of the inspection and required maximum required re-inspection date.

All persons using access equipment must be competent and shall undertake a full visual inspection of all equipment and their own PPE before use to ensure that it is free of any defects, the re-inspection date has not expired and is safe to use within the work location. Any defects identified during inspection must result in the equipment being removed from service immediately.

Any equipment taken out of use following a failed inspection must be made unusable, secured, and clearly labelled to prevent further use. Any defective equipment must be reported and immediately removed from use. Statutory scaffold inspections must only be undertaken by a competent person appropriate to the type of scaffolding.

Please note - Ladders and steps must be inspected by persons who are trained and competent in accordance with recognised industry standards.

## Appointments WaH

**Competency Levels for Appointed Person** Please note - Individual and Group qualifications are listed against each piece of access equipment within the WaH Manual)

Role	Skills	Knowledge	Experience	Training (This can be met through a personal development plan)
WaH AE (SME) & CAE	<ul style="list-style-type: none"> <li>IT</li> <li>Communication</li> <li>Co-operation and co-ordination</li> </ul>	<ul style="list-style-type: none"> <li>Demonstrable knowledge for aspects (see instructions) of working at height relevant to their role including relevant legislation.</li> <li>Understanding Temporary Works</li> </ul>	Demonstrable experience of WaH activities, temporary works, the ATW process.	<ul style="list-style-type: none"> <li>Management of Work at Height Course</li> <li>Level 3 award in Health and Safety</li> <li>Mitie Risk Assessment &amp; Method Statements</li> <li>Temporary Work Supervisor or Coordinator</li> <li>Authority to Work course (<i>provided as part of appointment</i>).</li> <li>See the specific competency in the WaH Manual</li> </ul>
Authorised Persons	<ul style="list-style-type: none"> <li>IT</li> <li>Communication</li> <li>Co-operation and co-ordination</li> </ul>	<ul style="list-style-type: none"> <li>Demonstrable knowledge for aspects (see instructions) of working at height relevant to their role including relevant legislation.</li> <li>Understanding Temporary Works</li> <li>qualifications for various WaH equipment</li> </ul>	Demonstrable experience of WaH activities and temporary works.	<ul style="list-style-type: none"> <li>Management of Work at Height Course</li> <li>Risk Assessment &amp; Method Statement course.</li> <li>Authority to Work awareness training (<i>provided as part of the appointment</i>).</li> </ul>
Competent Person	<ul style="list-style-type: none"> <li>Communication</li> <li>Co-operation and co-ordination</li> </ul>	Demonstrable knowledge for aspects (see instructions) of working at height relevant to their role including relevant legislation.	Line Manager makes an assessment based on experience (less experienced people may need to be mentored), aptitude and attitude.	<ul style="list-style-type: none"> <li>Relevant Working at Height Course (which includes Risk Assessment section)</li> <li>Risk Assessment &amp; Method Statement (for those who are using grandparent rights on WaH courses other than the Mitie course issued Jan23).</li> <li>Specific Training (see WaH Manual) to suit equipment / risk/ operation / site in accordance with best practice, Regulations and ACOP</li> </ul>
Instructed Person	NA	NA	NA	<ul style="list-style-type: none"> <li>Mitie (IP) Entry Level Working at Height Course</li> <li>Instruction on the use of the single piece of access equipment</li> <li>Completed TBT and course on Learning Hub.</li> </ul>

## Nomination of Personnel

The Mitie WaH CAE's will be appointed by the Mitie Director of Engineering (Specialist) – TS.

CAEs will appoint WaH AE's

AEs will appoint APs.

Line managers will nominate persons (AP's) to the AE via the Mitie WaH QHSE page link "Apply to become an AP."

CP's & IPs are appointed recognising line management endorsement for training and the successful completion of the requisite Mitie training package.

## Record Keeping

The automated systems linked with the Mitie QHSE WaH page link with the AE SharePoint site, where all records are stored, registers are then made available through the Mitie QHSE WaH page. Monthly register checks are completed with Mitie HR to ensure data is dependable.

## Authorising Engineer (AE)

The AE will be responsible for defining the scope of the appointment of Authorised Persons (AP).

The AE will review evidence, as supplied by the nominating person, of training received, experience gained, and relevant qualifications attained when making the assessment of competency and ensure that candidates for appointment as Authorised Persons. They must be able to,

- satisfy the qualification requirements,
- satisfy the training and familiarisation requirements,
- is able to show sufficient understanding of every system, installation, and equipment type that requires authorisation.
- satisfy the Authorising Engineer as to their competence and ability.

When satisfied, the AE will issue with a letter of appointment (email confirmation) valid for a period not exceeding three years to the AP defining the scope and any restrictions of the systems and installations for which each Authorised Person is responsible. This information will then be added to the WaH authorised person registers.

## Authorised Persons (AP)

The Authorised Person (AP) will have to be nominate by the BU and be assessed competent to undertake the role with the relevant knowledge and experience. Please note that a contractor/ agency worker can be appointed as an AP for a limited period, contract specific temporary appointment if assessed by the AE. Please see "Appointments" WaH for further detail

Working at height is an expansive subject and as such the requisite skills, knowledge, experience, and training are varied. To ensure that the AP is supported in reviewing and approving work at height activities across the scope, the AE will make an assessment as to their competence. If a restriction is noted the AE will confirm those arrangements when agreeing the appointment. Restrictions do not prohibit the AP working with the operational teams, reviewing the SSOW and drafting the ATW but they must gain a formal approval from an AE before final issue. Using the standard document suite (M forms Draft) to support the WAH management.

Please note with regards to training and the appointment process:

- Authorised Persons (AP) can only be authorised by an Authorising Engineer (AE) or (CAE)
- All approved WaH trainers (both internal and through HSS) will be Appointed Persons (AP's)

### **Competent and Trained personnel**

Work at height activities must be undertaken by competent personnel appropriate to the level of risk. For higher risk activities, all work must follow the approved safe system of work and any required authorisation process.