

Prevention of Falls and Working at Heights

It is the policy of the Company to avoid working at heights above 2 metres wherever practical. When avoidance is not an option, the objective of the company is to prevent incidents involving falls. This policy applies to all company personnel and also contractors working for and on behalf of the Company.

Under the OH&S Act and several regulations throughout Australia, specific requirements apply to the prevention of falls when either working at a height from the ground or working in an area where there is a drop from ground level. This particularly applies to the requirement to undertake a risk assessment, considering the specific hierarchy of controls appropriate to risk of falls including height work, and to implement such controls as to eliminate or minimise risk.

Definitions

Administrative controls means systems of work or work procedures which eliminate or reduce the risk of a fall.

Fall hazard is anything that has a potential to fall.

Fall injury prevention system means equipment or material or a combination of equipment and material that is designed to arrest the fall of a person.

Hazard identification is the process of identifying all situations or events that could give rise to the potential for injury, illness or damage to plant or property.

Industrial rope access system means a system designed for the purpose of carrying out work on a building or structure by a person.

Passive fall prevention device means material or equipment, or a combination of material and equipment, that is designed for the purpose of preventing a fall, and that, after initial installation, does not require any ongoing adjustment, alteration or operation by any person to ensure the integrity of the device to perform its function.

Risk means the likelihood of injury, illness or damage to plant or property arising from exposure to any hazard.

Risk assessment is the process of determining the likelihood of an injury, illness or damage to plant or property happening.

Risk control is the process of implementing measures to reduce the risk associated with a hazard. The control process must follow the control hierarchy, in order, as prescribed in some health and safety legislation. It is always important that any control measure does not introduce new hazards, and that on going effectiveness of the control is monitored.

When Does This Policy Apply?

If you do work, or are about to do work where there is **any chance of a fall of more than 2 metres**, then this policy applies to that situation.

Workplace examples may include but are not limited to:

- ⇒ Maintenance work where there is a risk of a fall
- ⇒ Falling from ground level into a ditch or hole
- ⇒ Working near an edge of a mezzanine where there is risk of a fall
- ⇒ Climbing a ladder to change globes where you are more than 1.8 metres above ground level
- ⇒ Cleaning high shelves where there is a need to be above 1.8 metres off the ground
- ⇒ Working on or around areas where there is a likelihood of a fall or drop to below ground level of 1.8 metres.

It is important to note that this rule applies to any area where there is likely a fall could occur, therefore, you do not have to be 2 metres above the ground, you simply may be in a position where you can drop 2 metres. Hence, areas where building or building modifications are occurring such as drains, earthworks, shop fit outs, renovations to shopping centres etc, are considered in this policy.

Prevention of Falls Process

The six key steps in managing the prevention of falls are:

1. Identification of the fall hazard at workplace locations and during particular activities
2. Assessment of the risk using an appropriate risk assessment methodology
3. Controlling the risk using the determination of an appropriate hierarchy of controls
4. Design and use of equipment to control risk of falls
5. Emergency procedures and preparedness
6. Training and consultation to ensure competency, knowledge and commitment to safe work procedures

Hierarchy of Control

The **Hierarchy of Control** for prevention of falls is about fixing the problem.

Put in control measures in place using the following order/hierarchy of control.

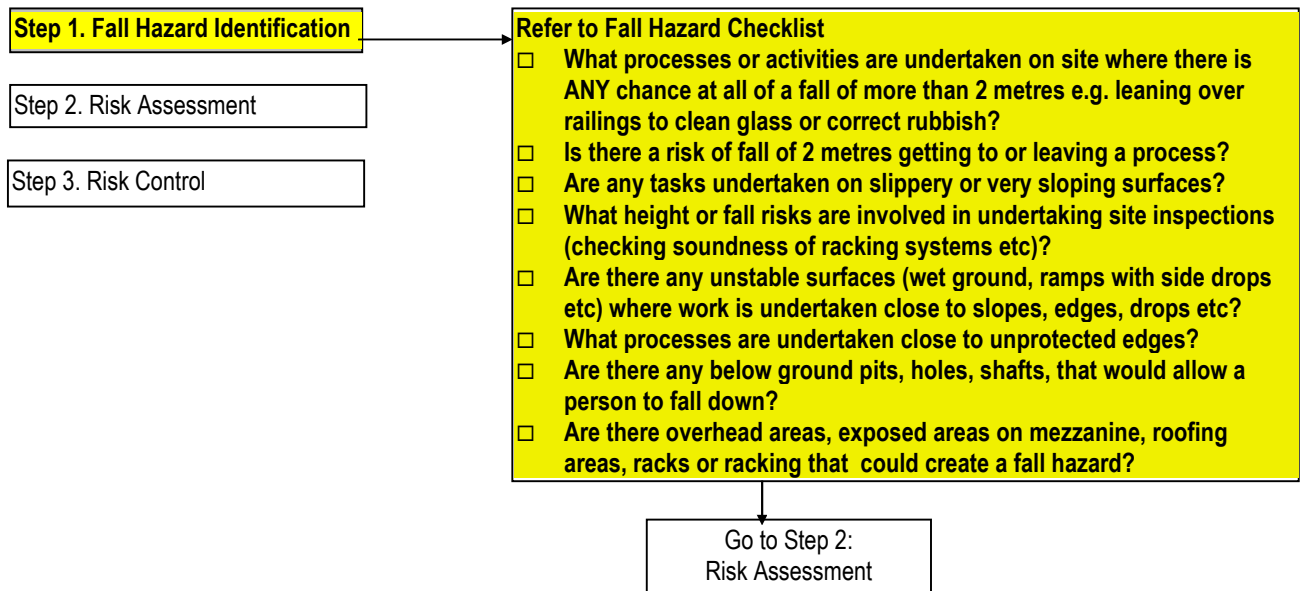
1. Eliminate the risk by **eliminating the opportunity to fall**.
 - e.g. work from the ground or from a solid structure, not balanced on a ladder
2. Use of a **passive fall prevention device**.

- means material or equipment designed for the prevention of falling and once installed, does not require further adjustment, alteration or operation by any person. e.g. work platform or guard railing
3. If unable to use options 1 or 2, and a risk of fall remains, risk control must be initiated using a **work positioning system**.
 - means any system other than a temporary work platform that enables a person to be positioned and safely supported whilst undertaking the task.
e.g. industrial rope access or travel restraint system
 4. If it is still not practicable to comply with any of the above, and the risk of fall remains, then a **fall injury prevention system** must be enacted.
 - a 'fall injury prevention system' is a device designed to arrest the fall of a person. e.g. safety harness, industrial safety net or catch platform, typically used in high rise window cleaning
 5. If all or part of a risk of fall remains even after implementing some or none of the above (whatever is practicable), then a **fixed portable ladder or administrative controls** must be implemented.
 - fixed portable ladder must be appropriate for the task, duration of the task and set up in an appropriate manner. Wherever possible, the ladder should be of a platform type that provides a flat surface area and handrail for protection when working
 - administrative controls must be described, recorded
 - and training undertaken to ensure employee competency prior to commencement of the task.

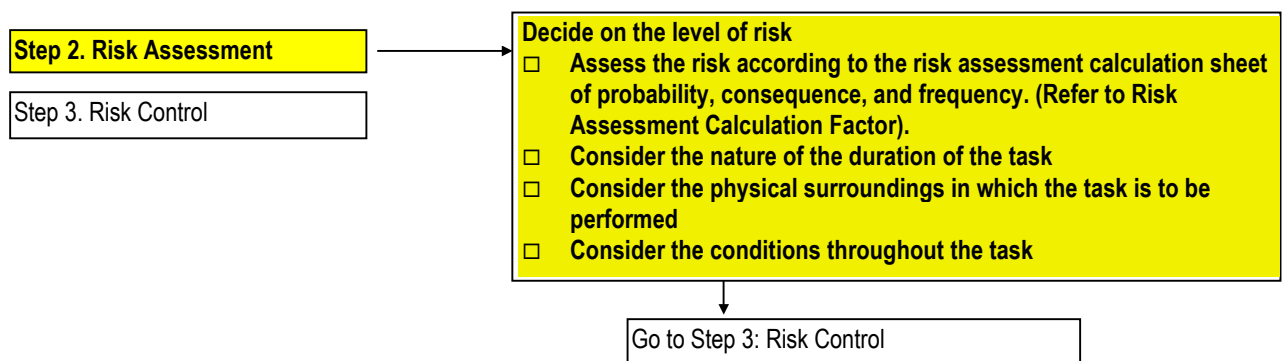
Procedure

1. Follow the attached flowchart of the hazard identification, risk assessment and risk control process.
2. Risk assessments will be signed of by a manager [or equivalent] and operational staff undertaking the work (including relevant contractors) as final management approval.
3. Use the attached 'Risk Assessment and Control Plan' form for each identified hazard. A Risk Assessment and Control Plan (this form) MUST be used for each hazard identified. Once completed, this form can be used when the same process applies. It is not necessary to complete a new form each time an activity is undertaken unless the conditions have changed. In such cases, the process needs to be reviewed and the Risk Assessment and Control Plan updated.

Step 1# Hazard identification – use attached form



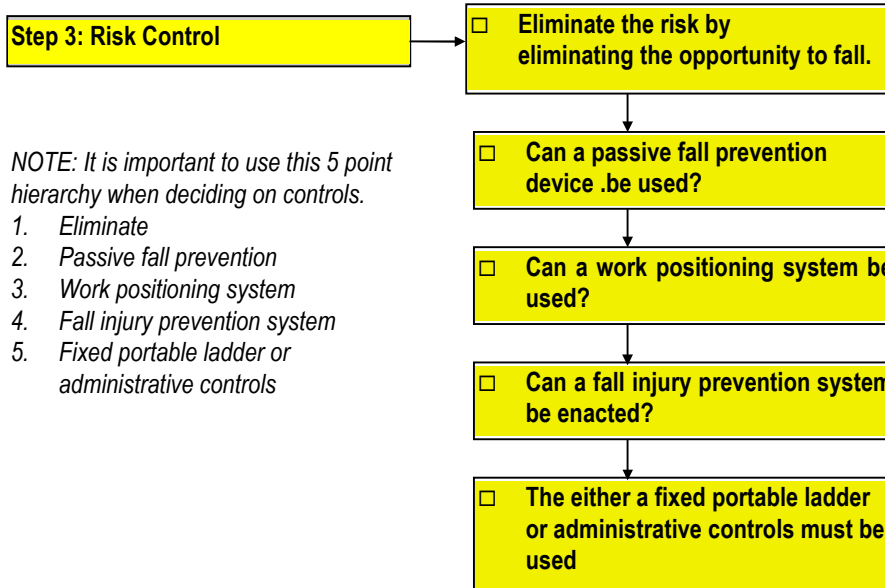
Step 2# Risk assessment



Make sure all employees who are part of the work process are also part of the risk assessment process.

Step 3# Risk Controls

Use the hierarchy of controls method (see below) when identifying options to control hazards.



Initiate controls in order of priority, i.e. substitution, engineering, administrative or PPE. Training and personal protective equipment are not considered sufficient and appropriate controls unless all other options have been tested.

Actioning decisions

- Agree on planned approach to the controls
- How do you intend to ensure the controls are effective NOW and in the FUTURE?
- Who is responsible for initiating controls?
- How do you know if the controls have minimised the hazard?
- Indicate what is intended on the Risk Control Plan.

| LIKELIHOOD | VALUE | ACTUAL SCORE |
|---|-------|--------------|
| • Common/very likely that it could happen | 10 | |
| • Quite likely that it could happen | 6 | |
| • Not likely but could happen | 3 | |
| • Unlikely to happen – quite remote | 1 | |
| • Virtually impossible to happen | 0.5 | |

| CONSEQUENCES | VALUE | ACTUAL SCORE |
|---|-------|--------------|
| • Death or environmental disaster | 10 | |
| • Permanent disability or permanent damage to the environment | 9 | |
| • Serious injury, illness or serious environmental damage | 7 | |
| • Injury/illness requiring medical treatment or some temporary environmental damage | 3 | |
| • First aid injury/illness or minor temporary environmental damage | 1 | |

| EXPOSURE | VALUE | ACTUAL SCORE |
|------------------------------------|-------|--------------|
| • Continuous – all the time | 10 | |
| • Daily – consistent | 6 | |
| • Weekly – frequent | 3 | |
| • Monthly – periodic | 2 | |
| • Seldom, few times a year | 1 | |
| • Yearly or regular periodic basis | 0.5 | |

RISK CALCULATION SHEET

To be used for all risk assessment calculations

$$\text{LIKELIHOOD} \times \text{CONSEQUENCES} \times \text{EXPOSURE} = \text{FINAL SCORE}$$

××=

| LEVEL OF RISK | SCORE |
|--|------------------|
| VERY HIGH Must initiate controls Senior Management Decision/Action required | ABOVE 400 |
| HIGH Must initiate controls Line Manager/Foreman Decision/Action required | 200 – 400 |
| MEDIUM Review for improvement opportunities | 70 – 200 |
| LOW | 20 – 70 |
| VERY LOW | BELOW 20 |

PREVENTION OF FALLS: RISK ASSESSMENT AND CONTROL PLAN

Area: _____ Date: _____ Undertaken by: _____

| | |
|--|--|
| Step 1# | Description of FALL HAZARD |
| Step 2# | Assessment of the risk using the risk assessment checklist |
| Step 3# | Identify risk control measures according to the hierarchy of controls |
| Step 4# | Design / plan the implementation of the controls. |
| Step 5# | Emergency planning in case of a fall. |
| Step 6# | Training and competency requirements for this task. |
| Attach signed off plans / drawings of any designed or developed control equipment or plant. | |

Decisions and outcomes agreed.

SIGNED: _____ DATE: _____

SIGNED: _____ DATE: _____

SIGNED: _____ DATE: _____

MONITORING & REVIEW (Annual): Review the controls to ensure they are effective?

SIGNED: _____ DATE: _____

PREVENTION OF FALLS HAZARDS - Checklist

| | |
|---|--|
| LEANING OVER RAILINGS | ⇒ e.g. attempting to clean edges on the outer sides of an escalator |
| STEEP SLOPES, SLIPPERY SURFACES | ⇒ e.g. risk of slip into or down steep slopes |
| GOODS STORED AT HEIGHT | ⇒ e.g. need to access means of reaching top levels of racking |
| THERMAL CONDITIONS | ⇒ e.g. heat stress affecting judgment |
| DUST, VISUAL IMPAIRMENT | ⇒ e.g. dust impaired vision of work area |
| MAINTENANCE ACTIVITIES AT HEIGHTS | ⇒ e.g. maintenance staff having to work in hazard areas |
| WORKING ON HIGHRISE BUILDINGS | ⇒ e.g. window cleaning |
| INSTALLATION, MAINTENANCE OR INSPECTION OF PLANT | ⇒ e.g. climbing up, down and in and around plant and equipment for inspection purposes |

PREVENTION OF FALLS HAZARDS - Checklist

| | |
|---|--|
| ELECTRICAL OVERHEADS | ⇒ e.g. high voltage overheads, transformers |
| GETTING TO WORK AREA | ⇒ e.g. difficult areas to access creating a risk, particularly when collecting litter |
| LEAVING WORK AREA | ⇒ e.g. difficult areas to get out of creating a risk |
| MEZZANINE FLOORS, WORKING ON, ACCESS, EGRESS | ⇒ e.g. difficult areas to access on uneven surfaces and in areas that have restricted access |
| CUT AWAYS | ⇒ e.g. ground areas that have soft surface areas |
| ACCESS & EGRESS FROM PLANT | ⇒ e.g. getting on and off large mobile plant onto rough surfaces |
| TRAFFIC HAZARDS | ⇒ e.g. lack of space for both pedestrians and mobile plant/vehicles near road edges |
| BROKEN OR WORN BARRIERS/RAILINGS | ⇒ e.g. risk of fall |

Additional Information

The following information provides an overview of systems used when working at heights.

Remember that fall prevention systems are only an option when the hazard cannot be removed. Fall prevention is not in itself a preventive measure, it only minimises the risk of injury, it does not minimise the risk of a fall.

Also remember that ladders are primarily an access and egress system and not a work platform, unless specifically designed for the task.

Scaffolds

It is not common practice for cleaning companies to be involved in the use of or erecting scaffolding. However, there are times when employees are on sites that require scaffolding and therefore, the following information is provided.

Where there is a risk of falling from a height, or falling objects creating a workplace hazard, and no scaffolding has been erected as a protective measure, employees should not enter the area. The employee should report the hazard to the Site Supervisor (on the job) and ask for instruction.

Platforms

Purpose built work platforms shall conform to the provision of positive fall protection where there is a danger to persons working from the platform.

This includes, where necessary, the provision of handrails, kickboards, safe access and a fully decked out work platform. There must also be provision for immobilising mobile platforms.

Caution: In all circumstances, positive protection must be provided where persons are exposed to risk of falling 1.8m or more. Work areas less than 1.8m in height shall not be considered as safe without some means of fall protection.

Working with Ladders

Workplace Managers must ensure that suitable ladders complying with statutory requirements are provided for the safe access of persons to elevated work areas or lowering into below ground level areas etc. Ladders are not a work platform unless specifically designed to be so. Ladders should be used for access and egress purposes only unless no other alternative option is available. Where no other alternative is available, and appropriate ladder, usually a platform type ladder, should be used. (Risk assessment required).

All ladders purchased should be approved to the appropriate Australian Standard for the type of ladder.

Long term storage of ladders should be in conditions which would prevent damage and deterioration. Ladders (including new ones) should be inspected prior to issuing to personnel.

All ladders should be inspected and if necessary, tested on a regular basis. All ladders considered unsafe must be removed from use and repair or, if this is not practical, condemned and not used.

The hazards associated with the use of ladders in work situations should be identified and assessed.

These may include:

- ⇒ incorrect type of ladder (eg. aluminium ladder for electrical work)
- ⇒ ladder falling off the wall (eg. angle too steep, ladder not secured)
- ⇒ rungs breaking under person's weight (eg. poorly maintained ladder, lack of regular inspections)
- ⇒ ladder sliding sideways (eg. unstable footing, uneven surface, ladder not secured, etc.).