Working at Height Procedure

Approval & Authorisation

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REFERENCES:

- VT-HSO1/1 Working at Height Policy and Practice
- VT-HS01/2 Control of Contractors Policy
- Health and Safety at Work Act etc. 1974
- Management of Health and Safety at Work Regulations 1999
- Working at Height Regulations 2005
- Safecontractor Working at Height Guidance Note No 2 November 2009
- CIS10 HSE Information – Tower Scaffolds and Ladders
- CIS149 HSE Information – General Access Scaffolds and Ladders
- HSG150 – Health & Safety in Construction
PART A

<table>
<thead>
<tr>
<th>Issue Record</th>
<th>This Company Policy will be updated when necessary and recorded on the revision record below. Amended or additional parts of revised pages will be marked by a vertical black line in the adjacent margin.</th>
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<tr>
<td>Issue</td>
<td>Date</td>
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<tr>
<td>1</td>
<td>February 13</td>
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<td>2</td>
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</table>

<table>
<thead>
<tr>
<th>Implementation</th>
<th>Implementation shall commence from date of receipt.</th>
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| Review | This policy will be reviewed annually and when any significant event or reorganisation occurs. |
PART B

1. INTRODUCTION
Vietec Limited was formed in August 2005 to provide wireless voice and data networking solutions to industry.

This Working at Height Procedure is mandatory and applies to all Vietec employees and subcontractors undertaking work activities using scaffolds and ladders. This includes the use of mobile towers and mobile elevated work platforms.

Robust health & safety measures, risk management and a culture of zero harm will be implemented by Vietec to ensure all work activities are carried out safely. The Managing Director will be responsible for all health & safety matters and shall ensure hazard control measures are implemented to mitigate risks associated with work activities so that risks are as low as reasonably possible (ALARP).

Vietec will pay particular attention to changing hazards when moving between projects. Specific health & safety roles and responsibilities will be allocated to project personnel. Detailed risk assessments will be undertaken by competent persons to highlight hazards and risks to feed into work package plans, task briefs and permits to work systems. Vietec will communicate all health & safety processes to its workforce and ensure continuous improvement, dissemination of best practice and incorporation of lessons learnt.

Vietec will foster an environment where everyone contributes to safe systems of work through active and open participation. Together with subcontractors and suppliers, Vietec will operate as an integrated team approach to ensure the health, safety and welfare of employees and subcontractors is inherent in all projects.

Our Health & Safety Policy and Practice (see VT-HS01) underpins the values of Vietec. It provides a vehicle to:

- eliminate or reduce health & safety risks;
- ensure Vietec complies with all statutory legislation;
- protect the health, safety and welfare of its employees and sub-contractors

2. PURPOSE
This procedure outlines the steps to be taken by Vietec to ensure that all employees and subcontractors do not work at height where it can be avoided and where it cannot suitable and sufficient controls are introduced following the appropriate hierarchy. To achieve this, our Health & Safety Policy and Practice requires a suitable and sufficient risk assessment to be completed for all tasks which require working at height.

3. SCOPE
This procedure applies to all employees and sub-contractors working for the undertakings of Vietec Limited.
4. DEFINITIONS

Site
Any location, other than the company’s established premises where work is undertaken as part of or in advance of a formal contract.

Employee
Any member of staff employed directly by and representing Vietec.

Sub-Contractor
Any engineer employed by the Company for the duration of a contract and representing Vietec.

Working at Height
A place is ‘at height’ if a person could be injured falling from it, even if it is at or below ground level.

5. PROCEDURE ACCESSIBILITY
This Working at Height Procedure shall be communicated to all employees and sub-contractors undertaking work activities using scaffolds and ladders. This includes the use of mobile towers and mobile elevated work platforms.

It shall be made available to all Vietec clients for information.

6. DOCUMENTATION & CHANGE CONTROL
All company documentation shall be controlled to ensure:

- it is issued to the appropriate personnel;
- is under the correct level of authority;
- revised as and when required;
- reissued as necessary and
- obsolete versions are removed from the point of use

Such documentation typically includes:

- Policies;
- Procedures;
- Specifications;
- Customer Orders;
- Plans / Drawings;
- Quality Assurance Manual;
- Health & Safety Statements;
- Risk Assessments;
- Methods of Work

7. MANAGING DIRECTORS HEALTH & SAFETY POLICY STATEMENT
Health and Safety is a core value which will be set in context with all other business objectives to ensure the health, safety and welfare of all Vietec employees and others who may be affected by the company’s activities. This statement of policy, and the organisation and arrangements for its implementation, has been prepared to comply with section 2(3) of the Health & Safety at Work Act etc. 1974. Further arrangements for its implementation are detailed within Vietec company processes, procedures, and site management plans.
The company will treat the need to prevent accidents, injuries and ill health to employees and others affected by its work as a top priority. In doing so, it will ensure priority is given to the assessment of risk, health and safety planning, and to provide proper information, instruction, training and supervision in accordance with the relevant statutory provisions and industry best practice.

Vietec is committed to review and improvement of health and safety performance, including implementing new guidelines and requirements in its endeavor to achieve industry best practice. Vietec will establish and review quantifiable objectives and targets according to the nature of our activities, business and other legal requirements, to ensure continual improvement in both our safety management systems and our performance.

Adequate resources, commitment and the participation of all employees will ensure the continuation and development of a positive health and safety culture. Vietec policy is to take all reasonable steps to prevent work related accidents and ill-health, and to support the general health and well-being of its employees. To implement this policy, Vietec will:

- make sure that the causes of accidents and ill-health that may arise from its activities are, wherever possible, identified, understood, and either prevented or controlled;
- manage health problems through early problem recognition and monitoring;
- manage return to work after sickness certification and, wherever possible, support rehabilitation after prolonged illness and
- provide employees with information and services to help them take personal responsibility for maintaining and improving their own health

It is a fundamental company belief that the creation of a safe workforce is achieved through clear and effective communication at all levels of the organisation. Our policy is to maintain a culture where our employees contribute to safe systems of work through active and open participation.

All employees and others working for Vietec are required to comply with this policy. In particular, by co-operating and carrying out activities safely, and in such a manner that does not intentionally or recklessly interfere with, or misuse, anything provided in the interest of health, safety or welfare. It is the responsibility of Vietec management and supervisory staff to ensure that this policy and its arrangements are implemented. This policy will be reviewed annually and revised as often as may be deemed appropriate by Vietec, and then brought to the attention of all employees. It will be accessible to all employees, sub-contractors and Vietec customers. It is my responsibility to ensure health, safety and welfare is at the fore of all we do at Vietec.

Philip Drew
Managing Director
Vietec Limited

3rd March 2017
8. RESPONSIBILITIES
All employees and sub-contractors of Vietec shall have a responsibility for their own health and safety and that of others who may be affected by their actions.

The Managing Director shall have full responsibility for health, safety and welfare of the company’s employees and sub-contractors. All Vietec managers shall ensure this Procedure is fully implemented and adhered to at all time.

Employees and sub-contractors shall:
- ensure this Procedure is fully implemented and adhered to at all time;
- take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions at work;
- co-operate with their employer to enable them to comply with any duties or requirements imposed on them;
- not intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare in pursuance of the relevant statutory provisions;
- shall use any machinery, equipment, dangerous substance or safety devices provided to them by their employer in accordance with any training or instructions provided by their employer in compliance with statutory provisions;
- inform their employer of any work situation which may represent a serious and imminent danger to health and safety and
- inform their employer of any matter which may represent a shortcoming in the employer’s arrangements for health and safety

9. COMMUNICATION AND CONSULTATION
Employees and sub-contractors shall be consulted on matters that affect their health and safety and, in particular, with regard to:

- The introduction of any measures or new technologies;
- Arrangements for appointing competent persons;
- Relevant health and safety information;
- Planning and organisation of any health and safety training;

This will be either directly or through elected representatives. Employees or representatives may make representations to management on potential hazards and dangerous occurrences at the workplace, which affect, or could affect, themselves or others. Consultation shall be carried out during:

- Inductions;
- Tool box talks;
- Method statement briefings;
- Subcontractor progress meetings;
- Health and safety meetings and
- Pre-arranged or ad-hoc meetings following any responses to information posted on notice boards
10. RISK ASSESSMENT
In the event of working at height being unavoidable, a suitable and sufficient risk assessment shall be completed. This shall identify all the necessary control measures to prevent fall and injury to the employee, sub-contractor and others working in the vicinity of the equipment.

Risk assessments may be generic covering the same task on a number of occasions and in a number of locations, but if there is significant changes to the task, location, personnel or the equipment used then a specific assessment shall be completed for that task.

When considering the use of a generic risk assessment the following factors shall be taken into account:

- the task
- equipment used
- competency of the personnel

The Work at Height Regulations 2005 provides a hierarchy of control measures for determining an appropriate level of control. This hierarchy shall be followed systematically and only when it is not reasonably practicable to introduce the controls shall the next level down be considered. It shall not be acceptable to accept controls from lower down the hierarchy (e.g. personal fall arrest equipment or ladders) in the first instance. The hierarchy has three basic steps to consider in order:

1. Avoid
2. Prevent
3. Minimise

<table>
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<tr>
<th>Hierarchy</th>
<th>General Guidance</th>
<th>Examples</th>
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<tbody>
<tr>
<td>1. Avoid</td>
<td>If you don’t have to go up there don’t.</td>
<td>Can the work be done from ground level?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Can the work be lowered to ground level?</td>
</tr>
<tr>
<td>2. Use work equipment or other measures to prevent falls where working at height cannot be avoided.</td>
<td>Can an existing safe place at height be used? Adopt a more suitable method of working. Select of suitable equipment.</td>
<td>Use an existing building or structure including its means of access and egress. Use fixed scaffold, mobile elevated work platforms.</td>
</tr>
<tr>
<td>3. Where you cannot eliminate a risk of a fall, use work equipment or other measures to minimise the distance and consequences if a fall should occur.</td>
<td>Give collective measures priority over personal. Mitigate the consequences of a fall. Prevent any person falling a distance liable to</td>
<td>Use landing mats nets.</td>
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<tr>
<td></td>
<td>Have measures in place to arrest a fall?</td>
<td>Use fall arrest equipment,</td>
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11. CHOOSING THE RIGHT WORK EQUIPMENT
When selecting work equipment Vietec shall give collective protection (passive systems in that they do not require any action by the person at the work position) priority over personal protection measures; examples include:

- guardrails,
- tower scaffolds;
- mobile elevated work equipment which provides collective fall prevention;
- nets and airbags

When choosing the suitability of equipment to work at height consideration shall be given to all the following points:

11.1 Working conditions
Slopes, poor ground, obstructions and traffic can determine the choice of work equipment e.g. a mobile elevated work platform (MEWP) could reach over bad ground or obstructions as long as its stability was not compromised. MEWP's must be used on firm ground which is free from slopes / holes likely to result in overturning. Tower scaffolds should rest on firm level ground, with the wheels or feet properly supported and if necessary outriggers fitted.

11.2 Weather conditions
Adverse weather conditions need to be anticipated and suitable precautions taken. Rain, ice, or snow can turn a secure footing into a skating rink. A roof should always be inspected before work starts to see if conditions have changed and to check whether it is safe to work. Sudden gusts of wind can lead to a loss of balance. An anemometer should be available to measure wind speed on the roof if large sheets are being handled and the safety manager contacted for advice on wind speeds.

11.3 Access and egress
The distance to be negotiated for access and egress needs consideration. Ladders are likely to be less suitable from higher access. Provide fixed access or towers with internal stairs from higher access.

11.4 Distance and consequences of a fall
A fall arrest lanyard would be unacceptable if the deployment length of the lanyard and energy absorber where greater than the fall height. The user would hit the floor before the system could deploy. Nets and airbags become less reliable in terms of preventing injury the higher the fall, alternative work equipment should be selected in such circumstances.

11.5 Duration and frequency of use
Long Duration higher frequency of work can justify a better standard of fall protection e.g. a tower scaffold rather that a ladder. However a ladder may be justified for short duration low risk repetitive work. Care should be taken when requiring precautions for short duration work (taking minutes rather than hours) because it may not be reasonably practicable to install safeguards such as edge protection.
11.6 Ease of rescue / evacuation
If evacuation from employed fall arrest equipment is going to be difficult, choose other work equipment.

11.7 Risk of use Installation and removal of equipment
A MEWP used by 1 person to work safely at height may entail less risk than exposing 2 or 3 people to risk in order to erect a tower or scaffold for the 1 person to work safely. The 2 or 3 people will be exposed to more risk during installation and removal of scaffold tubing / boarding etc. which has to be installed / dismantled at height. A MEWP will entail lower installation and removal risks. If there are overhead electrical lines crossing the site or near to the site, there may be a danger of contact or near contact with scaffolding tubes, metal roof sheets, or ladders causing flashover.

11.8 Work on sloping and flat roofs
For work on sloping roofs unless of very short duration full edge protection is required on all roof elevations to which access is needed. This is to prevent people and materials falling from the lower edge of the roof. The potential loading on edge protection when a person falls down a pitched roof onto it is much greater compared to falling against it on a flat roof. The scaffold supplier must be aware of the roof pitch when specifying edge protection. All work within 2 metres of gable ends no matter what the time duration of the work must have edge protection at those edges.

For work of a short duration on a pitched roof the decision on whether or not to erect edge protection will depend on a number of factors. The minimum standard for such short duration work on a pitched roof is:

- a safe means of access to roof level and
- a properly constructed and supported roof ladder

Under no circumstances must any individual work directly on tiles or slates unless additional measures to prevent falls e.g. a safety harness with a suitable anchorage point are provided.

Roof ladders must be designed and fabricated to be fit for purpose and:

- strong enough to support workers when spanning across the supports for the roof coverings;
- long enough to span the supports (at least three rafters) and
- secured or placed to prevent accidental movement

The anchorage at the top of the roof ladder should be by some method which does not depend on the ridge capping. The anchorage should bear on the opposite slope by a properly designed manufactured ridge iron or be secured by other means.

Eaves and gutters should not be used as footing or to support a roof ladder.

11.9 Flat roofs
Where the design of the roof does not provide permanent edge protection, then temporary edge protection will normally be required, e.g. by means of guard rails and toe boards which should when erected:
• give protection during the full course of the work;
• be strong and rigid enough to prevent people from falling and be able to withstand other loads likely to be placed on them;
• when fixed to a structure capable of supporting them; and
• be designed in such a way that it is not necessary to remove them in order to work at the edge of the roof

All guard rails should meet the minimum legal standard, i.e. they should include:

• a main guard rail at least 910 mm above any edge from which people are liable to fall;
• a toe board at least 150 mm high; and
• an intermediate guard rail, barrier or suitable alternative, positioned so that the unprotected gap is no greater than 470

Where limited work is being carried out on sections of a large roof, a simple form of barrier some distance from the roof edge could identify the work area and any access route to it. The distance should be adequate to ensure that people working within the demarcated area cannot fall from the edge of the roof. For roofs with a slight slope where this method is used, it may be necessary to prevent materials rolling away, beyond the safe area.

In most circumstances a distance of at least 2 m from the edge will be sufficient. This will depend on the geometry of the roof and may need to be increased. This type of barrier is only acceptable where there is a high level of supervision and discipline to ensure that people do not go beyond the demarcated area. There should be no unprotected holes, breaks or fragile material within the 'safe area'. Markings at foot level are not a suitable alternative to a barrier.

For short duration work on flat roofs, it may not be feasible to provide edge protection. In these circumstances the decision on the precautions to be taken will depend on an overall assessment of the risks involved which should consider:

• duration of the work;
• complexity of the work;
• pitch of the roof;
• condition of the roof;
• weather conditions;
• risk to those putting up edge protection and
• risk to other workers and the public

Mobile access equipment can provide a safe working platform in some situations. Where this is not practicable, then travel restraint or fall arrest should be considered.

11.10  Fragile surfaces
A fragile surface is a surface that would be liable to fail if any reasonably foreseeable loading were to be applied to it. Where it is possible working on fragile materials should be avoided. All fragile surfaces near any area where work at height is taking place must be identified on the risk assessment e.g. asbestos, cement / plastic sheet, glass, wood, roof lights. All fragile...
surfaces must have a fixed warning notice at all access points. Work on or near fragile surfaces must be carefully planned and the principles of the hierarchy of control measures firmly applied. Any work on or near fragile materials must be subject to a permit to work system.

11.11 Training
All employees and sub-contractors who work at height must attend a working at height awareness course. Additionally employees and sub-contractors who use equipment to work at height must receive an appropriate level of information instruction or training in the use of that specific equipment used. This includes a range of equipment from kick stools, ladders, scissor lifts, harnesses and scaffolds.

All training must be reviewed regularly and within a maximum timescale of three years.

11.12 Ladders and Step Ladders
Ladders have not been banned in the workplace. The use of ladders and step ladders can be justified being at the bottom of the hierarchy, providing the user has been trained and instructed in the selection and safe use of ladders and systems are in place to ensure ladders are maintained and inspected every six months. Ladders do not prevent a fall or mitigate a fall but if used by trained operators in appropriate circumstances i.e. low risk and for short durations, their work can be justified. Vietec shall operate a ladder register, detailing the date of purchase, date and frequency of maintenance, defects reported, repair work etc. All ladders must have an identifiable number. When possible, access ladders should be removed to prevent their unauthorised use. Easily accessible permanently fixed access ladders should be blocked off e.g. by boards over rungs when access is not required. All ladders and step ladders must be stored correctly consult the manufacturer’s instructions for safe storage of ladders and step ladders.

When using a ladder all users shall:

- The work is of short duration and involves only light work.
- Three points of contact can be maintained at all times.
- The work only requires one hand to be used.
- The work can be reached without stretching.
- The ladder can be fixed to prevent slipping.
- A good handhold is available.
- The ladder is safe to use and has been regularly inspected.

When using step ladders all users shall ensure:

- all four legs are in contact with the ground;
- stepladders with the rungs are facing the work activity and not side on as this is less stable;
- ladders are the correct length and you do not overreach;
- you do not use the top three (including the top step) rungs of the stepladder unless it has a suitable hand rail and
- you use appropriate footwear

All step ladders used by Vietec employees and sub-contractors shall be the British
Standard for stepladders BS / EN 131 or BS 2037 (aluminium) BS 1129 (wood) and shall be Class 1 (industrial).

11.13 Mobile elevated work platforms
If a mobile elevated working platform is selected Vietec shall ensure the following:

- A suitably trained and competent person operates the platform.
- Fall arrest equipment is provided and used by the person or persons inside the platform.
- No one in the platform will climb out over the guard rails unless the platform is specifically designed to allow this.
- All hand tools are secured to the platform with safety ropes to prevent them falling should they be dropped.
- A suitable means of decent from the platform is provided in case of an emergency.
- Maintenance and test records (dated within the last 6 months) of the equipment are available for inspection.

11.14 Mobile scaffolding towers
If a mobile scaffolding tower is selected Vietec shall ensure the following:

- It has been erected by a suitably trained and competent individual.
- The relevant components show no signs of rust or damage.
- A suitable means of access is provided inside the tower.
- Toe boards and guard rails are provided at the suitable heights (Toe board 150mm, intermediate guard rail 470mm and the top guard rail 950mm).
- That weather and ground conditions are properly considered as these may adversely affect the stability of the tower and also its suitability for the task.
- Manufacturers’ guidelines are followed in relation to the height to base width ratio.
- That an inspection regime is in place to ensure the tower remains safe at all times.

11.15 Fixed Scaffolding
If fixed scaffolding is selected Vietec shall ensure the following:

- That it has been designed, erected, altered and dismantled by a competent person or the work is supervised by a competent person.
- It is only erected on a firm level foundation that is capable of taking the load of the scaffold.
- It is braced and tied to a permanent structure or otherwise stabilised.
- If it is to be loaded then it must be appropriately altered to withstand the extra weight.
- Platforms are fully boarded and wide enough for work and access.
- Scaffold boards are properly supported and do not overhang excessively i.e. more than four times its thickness.
- That there is a safe ladder or other means of access to the platform. If a ladder is used it must be tied off and extend at least one metre above the platform to provide a safe handhold.
- It is regularly inspected and formal detailed inspections are made at least every 7 days or sooner if something occurs that may have affected its strength and/or stability.
11.16 Harnesses
Vietec shall ensure that a suitable and sufficient risk assessment has been undertaken to ensure no other safer means of working can be achieved. All personnel who use a harness must hold a current International Powered Access Federation (IPAF) safety harness training card.

11.17 Falling objects
Where it is reasonably practicable all steps must be taken to prevent anything falling from any elevated working platform ladders or step ladders. Additionally nothing must be thrown or tipped from a height, or stored in such a way that its movement is likely to injure anybody. The provision of waste chutes, directly into sealed skips and the use of barriers to secure a clearly marked area to prevent unauthorised persons access are two possible ways of achieving this.

11.18 Additional hazards
Care should be taken not to expose anybody to additional hazards when working or accessing an unfamiliar place of work. Consideration must be given to the location of overhead power cables or service cables particularly when the assembly of height access equipment is being undertaken. Stack pipes which may emit harmful fumes. Manual handling risks in particular the methods to be utilised to get equipment and materials to the place of work. The safe working principles must not be compromised when transferring equipment and materials to and from the place of work. Whenever possible the use of battery operated electrical equipment must be used at height. The work area can cause damage to the cable insulation on 240V and 110V electrical equipment. However if they have to be used all electrical supplies should be obtained from properly constructed and installed plugs and sockets of the industrial type and always used in conjunction with a Residual Current Device (RCD). Additionally shall electrical equipment must be properly installed and maintained.

11.19 Inspections
All equipment used for working at height must be inspected by a competent person. This inspection must be vigorous as well as visual. Inspections must be carried out on all scaffolds, including tower and Mobile Elevated Work Platforms (MEWP) at the following intervals:

- after installation or assembly;
- if exposed to conditions likely to cause deterioration e.g. soft ground high winds etc.;
- every 7 days;
- after any incident or report of near miss and
- after exceptional circumstances which may jeopardise the safety of the equipment

The inspection shall be documented. If the inspection identifies that the safety of any person is placed at risk, the site must be cleared immediately and the Safety Manager informed.

A simple visual check shall be completed by all users prior to use. The simple check is looking for the following defects:

- missing damaged or worn anti-slip feet on metal and fibreglass ladders (these are essential for good grip);
- items stuck in the feet such as swarf, stones grease or dirt, preventing the feet from making contact with the ground;
- mud grease or oil either on the rungs or the stiles (the slides);
- cracks in the rungs or stiles of the ladder;
- missing broken or weakened rungs;
- missing or damaged tie rods and/or
- check metal ladders for cracked or damaged welds and missing or loose screws or rivets

12.0 IMPLEMENTATION
For Vietec risk management to be effective this procedure has been structured to support approach for the implementation of training and will demonstrate our commitment that all staff are taking positive steps and working in partnership with each other and customers to provide a positive risk management culture within the organisation.

To achieve this, our Working at Height Procedure will be:

- reviewed annually and approved by the senior management team;
- circulated to all managers with specific responsibilities detailed in the document;
- available to all employees and sub-contractors and
- available to all clients on request

Our Health & Safety Manager will provide support and guidance to all staff to implement this procedure.