Working at Height Procedure

Section 1 - Purpose and Scope

(1) This Procedure outlines requirements at The University of Queensland (UQ) for working at height and provides information about the hazards and precautions in place at UQ to reduce the risk of harm when working at height. UQ's legislative obligations for managing working at height are provided under the Work Health and Safety Act 2011 (WHS Act).

(2) This Procedure applies to all UQ workers on all UQ campuses and sites, including controlled entities. For the purposes of this Procedure, the definition of UQ workers is broad and is intended to ensure UQ meets its responsibilities under the WHS Act. The definition of UQ workers is provided in the Appendix.

(3) In addition to the requirements of this Procedure:

a. UQ's Work at Height Management Plan describes the systems developed by UQ to identify and mitigate risks associated with work at height. UQ workers conducting work at height must refer to this plan in conjunction with the requirements of this Procedure:
    i. UQ Work at Height Management Plan
    ii. Property and Facilities Division Work at Height Management Plan.
b. The Managing the Risk of Falls at Workplaces Code of Practice 2021 (the Code) provides practical guidance to achieving the standards of health, safety and welfare required under the Work Health and Safety Regulation 2011 (WHS Regulation). UQ will implement relevant and appropriate measures from the Code.

Scope

(4) For the purposes of this Procedure, working at height includes the following activities:

a. High-risk construction work (e.g. construction work that involves a risk of a person falling more than 2m);
b. Non-construction work above 2m (e.g. taking scientific measurements that involves a risk of a person falling more than 2m); and
c. Work at height less than 2m (e.g. where there is a risk of falling from one level to another).

Section 2 - Process and Key Controls

(5) The following requirements apply to all UQ workers proposing to conduct any work at height at UQ:

a. Access to roofs and unprotected balconies at UQ is restricted and centrally managed by the Property and Facilities Division (P&F).
    i. Any proposed work on roofs at UQ must be arranged through P&F (pfassist@pf.uq.edu.au);
    ii. Only authorised UQ workers are permitted to access roofs at UQ with the required roof access permit (PF-184);
    iii. Contractors will work under their own permit systems and require authorisation by submitting a Roof Access Request Form (PF-722) from P&F to access roofs at UQ (refer to the Work at Height Management

Plans for details);

iv. Roof space that has been allocated to Organisational Units for permanent or long-term use, in agreement with P&F, must adhere to the steps outlined in the Work at Height Management Plans.

b. Where work at height cannot be undertaken on a solid construction, and where fall arrest is the main measure to control the risk, UQ will outsource the work to competent contractors (excluding operating elevated work platforms – refer to clause 23 of this Procedure and the Work at Height Management Plans for further information).
c. High-risk construction work that involves a risk of a person falling more than 2m must not be carried out without a relevant Safe Work Method Statement (SWMS) in place.
d. A risk assessment must be undertaken to identify the hazards associated with work at height, and the controls proportionate and relevant to the activities being undertaken. The risk assessment must be completed in UQSafe and reviewed and approved by the relevant supervisor as outlined in the Health and Safety Risk Assessment Procedure and when the activities change.
e. UQ workers who are required and are authorised to work at height must be appropriately trained and competent.

Section 3 - Key Requirements

Property and Facilities Division Roof Register

(6) P&F will maintain a register of rooftops and unprotected balconies across all UQ campuses and sites. Access to these areas will be restricted and all roof access points will be appropriately signed. UQ Workers requiring access to a roof or unprotected balcony at a UQ campus or site must consult with their local Health, Safety and Wellness Managers (HSW Managers) for them to contact the relevant Client Facilities Manager (CFM) and/or P&F (pfassist@pf.uq.edu.au).

High-risk Construction Work

(7) A Safe Work Method Statement (SWMS) must be prepared before any high-risk construction work commences.

Safe Work Method Statement (SWMS)

(8) Organisational Units must ensure the preparation and implementation of a SWMS for high-risk construction work performed by UQ workers. SWMS may also be supported by a specific job hazard analysis (JHA) or risk assessment.

Organisational Unit Risk Assessment and Registers

(9) Risk assessments for all other activities undertaken by UQ workers and infrastructure involving work at height must be completed in UQSafe by the Organisational Unit and must address all associated risks.

(10) The hierarchy of risk controls must be considered for developing and implementing control measures in the risk assessment process. Refer to the Health and Safety Risk Management Procedure for more information.

(11) Further guidance in conducting workplace risk assessments is available from UQ HSW Managers or Work Health and Safety Coordinators (WHSCs).

Non-construction Work at Height Above 2m

(12) Organisational Units must ensure that risk assessments are completed in UQSafe for tasks and activities that require working at height greater than 2m. UQ workers should firstly consider whether the work needs to be conducted at height or if there is another way the work can be undertaken.

Work at Height Less than 2m

(13) Organisational Units must ensure that risk assessments are completed in UQSafe for tasks and activities that require working at heights less than 2m to determine:

a. the risk of falling from one height or level to another; and
b. risks from falling objects.

(14) Appropriate equipment must be used for any work at height (e.g. platform ladders should be used instead of standing on furniture).

Emergency Response Plan (ERP)

(15) UQ will outsource work at height that may require the performance of at-height rescues to external contractors with expertise and appropriate emergency procedures for such tasks.

(16) For all other work at height, as determined by a risk assessment, an ERP must be developed by competent persons prior to working at height. The WHS Regulation and the Code stipulate the need for emergency and rescue procedures. Consideration should be given to:

a. communications
b. rescue and resuscitation equipment
c. capabilities of rescuers
d. first aid
e. local emergency services.

(17) Where a fall arrest system is used as a control measure (see clause 5.b), emergency and rescue procedures must be established, tested to ensure they are effective, and relevant workers must be provided with suitable information, training and instruction in those procedures. Rescue arrangements must enable the prompt retrieval of a suspended worker, as prolonged motionless suspension in a harness can cause suspension (orthostatic) intolerance, which can be life-threatening. Reliance on local emergency services alone is not sufficient.

Competency and Training

(18) UQ workers that are required to work at height must have the skills and knowledge to understand the hazards associated with the tasks, the requirements of Roof Access Permits (PF-184) and their associated control measures.

(19) Organisational Units must ensure that UQ workers responsible for installing, maintaining, using, and inspecting work at height equipment are trained and competent.

(20) UQ workers that are required to work at height using work positioning systems must hold a certificate of competency from a nationally accredited Registered Training Organisation (RTO).

(21) Organisational Units must ensure that UQ workers undertaking work above 2m (either construction or non-construction) have the necessary training, instruction, and supervision to undertake the task competently.

(22) Records of all training provided to UQ workers for working at heights must be kept by the Organisational Unit.

Elevated Work Platforms (EWP)

(23) EWP may be used by UQ workers as a working platform. EWP must not be used as a means of entering or exiting a work area unless the risk assessment shows that it is safer than all other means of access. The following requirements apply to the use of EWP:

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a. EWP must be operated in accordance with the manufacturer's or supplier's instructions and the safe operating procedure located on the machine;
b. only licensed EWP operators are authorised to operate EWP;
c. a competent person must act as a spotter and rescuer, remaining on the ground and in clear view of the EWP operator at all times;
d. harnesses and lanyards must be visibly inspected by the EWP operator prior to every use and be within certified inspection dates; and
e. work is not permitted and must cease in the event of wind speeds exceeding those specified on the equipment specification plate, or during any lightning.

Scaffolds

(24) Where a person or object may fall 4m or less, a competent person with relevant information, instruction, training, and supervision may erect, move or relocate scaffolds. If a person or object may fall more than 4m from the scaffold, a licensed contractor must be engaged to erect, move or relocate the scaffold.

(25) All fixed and mobile scaffold use must be carefully planned in consultation with all relevant UQ workers and key stakeholders impacted in the work area.

(26) For more information about safe scaffold use, refer to the Work at Height Management Plans.

Use of Ladders

(27) Only appropriate, fit-for-purpose ladders should be used by UQ workers. Domestic ladders must not be used. When selecting a ladder, consider the duration of the task, the physical surroundings of where the task is to be undertaken and the prevailing weather conditions.

(28) Organisational Units are responsible for ensuring that safe operating procedures are followed when ladders are used by UQ workers in their area and that ladders:

a. comply with Australian Standards and have a clearly displayed load rating of at least 120kg;
b. are manufactured for industrial use; and
c. are regularly inspected and maintained.

(29) For more information about safe ladder use, refer to the Work at Height Management Plans.

Falling Objects

(30) Where work is being conducted overhead and there is a risk of being struck by falling objects, the area must be controlled by barriers cordoning off the area below.

(31) Barricading and signage must be used, as far as practicable, to ensure all non-essential personnel and equipment are kept clear of any work area where there is a risk of falling from height or being struck by a falling object.

(32) In access areas or doorways, if necessary, erect a barrier or lock the door shut.

Personal Protective Equipment (PPE)

(33) PPE must be used where determined to be an appropriate control measure, either in combination with other controls or as a stand-alone measure, through the risk assessment process or where if stated in regulations or procedures. Refer to the Personal Protective Equipment Procedure for more information.

Section 4 - Roles, Responsibilities and Accountabilities

Heads of Organisational Units

(34) Heads of Organisational Units are responsible for:

a. managing the risk of falls in their areas of responsibility in accordance with this Procedure and the Work at Height Management Plans;
b. seeking advice from their local WHSC or HSW Manager on implementing the requirements of this Procedure and the Work at Height Management Plans; and
c. ensuring that managers and supervisors in their areas of responsibility, who manage UQ workers required to work at height, are aware of this Procedure and the Work at Height Management Plans and provide resources to meet the requirements of this Procedure.

Managers and Supervisors

(35) Managers and supervisors are responsible for ensuring:

a. UQ workers under their supervision conducting work at height are suitably qualified, trained and competent (refer to “Competency and Training” clauses 17-21) and have been informed of the Work at Height Management Plans;
b. relevant equipment, information, supervision, training and instructions to UQ workers regarding working at heights are provided;
c. equipment controlled and managed in their Organisational Unit (e.g. harnesses, lanyards, ropes and fall restraint devices) is inspected and maintained in accordance with AS/NZS1891 Industrial Fall-arrest Systems and Devices;
d. risk assessments are conducted in consultation with UQ workers; and
e. records of inspection and maintenance of all equipment is maintained and kept with the equipment.

HSW Managers and Work Health and Safety Coordinators (WHSCs)

(36) HSW Managers and WHSCs are responsible for:

a. providing advice and guidance to UQ workers in their Organisational Unit on how to implement and operationalise this Procedure and the Work at Height Management Plans;
b. assisting managers, supervisors and UQ workers to conduct and review risk assessments for work at height; and
c. consulting with Health, Safety and Wellness Division (HSW Division) on any constraints to implementing the requirements of this Procedure or the Work at Height Management Plans.

UQ Workers

(37) UQ workers conducting work at height are responsible for:

a. complying with the requirements of this Procedure and any information, training or instruction they receive from their manager or supervisor;
b. inspecting equipment, such as harnesses, lanyards, ropes and fall restraint devices to ensure it is in good physical condition prior to every use; and

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c. assisting managers and supervisors in conducting risk assessments before the commencement of any work at height.

Property and Facilities Division (P&F)

(38) Property and Facilities Division (P&F) is responsible for:

a. maintaining UQ's register of rooftops and unprotected balconies;
b. restricting access to rooftops and unprotected balconies;
c. conducting roof risk assessments in UQSafe for all UQ buildings and reviewing these risk assessments annually;
d. ensuring P&F workers undertake Job Hazard Analysis (JHA) before conducting work at height;
e. inspecting and maintaining anchor points for all UQ building roof tops in accordance with AS/NZS1891 Industrial Fall-arrest Systems and Devices;
f. managing UQ's Roof Access Permit (PF-184) system, including the application and approval process, and authorising access to roofs at UQ;
g. applying this Procedure to P&F high-risk construction work and any other work involving work at height by P&F workers; and
h. providing contractors with information about all known risks for working on UQ roofs and ensuring they have the appropriate training and emergency plans to facilitate a safe rescue if required.

Health, Safety and Wellness Division (HSW Division)

(39) HSW Division is responsible for:

a. supporting P&F in the ongoing development and implementation of this Procedure and providing health and safety advice to P&F when required or requested;
b. communicating this Procedure to Organisational Units and UQ's Safety Network for implementation; and
c. providing guidance and advice to Organisational Units, in collaboration with P&F, on the implementation of this Procedure.

Section 5 - Monitoring, Review and Assurance

(40) P&F is responsible for reviewing this Procedure as required, in collaboration with the HSW Division, to ensure its accuracy, relevance and effectiveness. Review of the Procedure will also be informed by feedback from Heads of Organisational Units, supervisors and managers.

(41) HSW Division will conduct periodic audits of Organisational Unit compliance with this Procedure, which may include checking:

a. the existence, adequacy and review of work at height risk assessments and ERPs;
b. Roof Access Permit approvals (PF-184);
c. UQ workers' compliance with Roof Access Permit (PF-184) requirements;
d. UQ workers' awareness of compliance obligations associated with this Procedure;
e. UQ workers' work at height competency and refresher training documentation; and
f. management of contractors regarding work at height.

(42) Local HSW Managers and WHSCs will conduct regular inspections (at least annually) to review appropriate risk controls.

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Section 6 - Recording and Reporting

(43) HSW Managers and Organisational Unit managers and supervisors will ensure:

a. all work at height incidents and near misses are reported in UQSafe;
b. non-compliance with this Procedure, the Work at Height Management Plans and relevant LSOPs is reported to the Head of Organisational Unit, who will notify the HSW Division; and
c. approved Roof Access Permits (PF-184) will be recorded and held locally.

Section 7 - Appendix

Definitions

Term	Definition
Competent person	a person who has acquired through training, qualification or experience, or a combination of these, the training and knowledge and skills to carry out that task.
Construction work	means any work carried out in connection with the construction, alteration, conversion, fitting-out, commissioning, renovation, repair, maintenance, refurbishment, demolition, decommissioning or dismantling of a structure.
Elevating work platform (EWP)	a device used to support a platform on which personnel, equipment and materials can be elevated to perform work. While EWPs come in a range of different configurations, the general types of EWP include: • self-propelled scissor lifts • self-propelled boom-type • truck-mounted • trailer-mounted.
Fall	a fall by a person from one level to another.
Fall arrest	plant or material designed to arrest a fall.
High-risk construction work	in the context of falls from heights, means construction work that involves a risk of a person falling more than 2m.
Job Hazard Analysis (JHA)	also called a Job Safety Analysis (JSA), is a technique to identify the hazards and risks of specific tasks in order to reduce the risk of injury to workers.
Scaffolding	the individual components, for example tubes, couplers or frames and materials that when assembled form a scaffold. Scaffolding is classified as plant under the WHS Act.
Safe work method statement (SWMS)	in relation to high-risk construction work, is a safe work method statement mentioned in section 299 of the WHS Regulation.
Solid construction	means an area that has: • a surface that is structurally capable of supporting all persons and things that may be located or placed on it; • barriers around its perimeter and any openings to prevent a fall; • an even and readily negotiable surface and gradient; and • a safe means of entry and exit.
Work at height	where there is a risk of falling from one level to another (e.g. falling from a step ladder).
Work positioning system	involves the use of equipment that enables a person to work supported in a harness in tension in such a way that a fall is prevented.

Term	Definition
UQ Workers	for the purposes of this Procedure, UQ Workers include: • staff - continuing, fixed-term, research (contingent funded) and casual staff; • contractors, subcontractors and consultants working under UQ systems and control (e.g. contingent workers); • visiting academics and researchers; • affiliates - academic title holders, visiting academics, emeritus professors, adjunct and honorary title-holders, industry fellows and conjoint appointments; • higher degree by research students; and • volunteers and students undertaking work experience.

Status and Details

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