1. **Purpose:**
The purpose of this procedure is to ensure all risks associated with working at height within Department of Education and Early Childhood Development (DEECD) workplaces are identified and managed.

2. **Scope:**
This procedure applies to all tasks that require working at a height which are performed in DEECD workplaces including schools and central/regional offices.

3. **References:**
   - Occupational Health and Safety Act 2004
   - Occupational Health and Safety Regulations 2007
   - Prevention of Falls in General Construction Compliance Code; Edition 1: September 2008
   - AS1562.1:1992- Design and installation of sheet roof and wall cladding – Metal
   - AS1562.2:1999- Design and installation of sheet roof and wall cladding – Corrugated fibre-reinforced cement
   - AS1562.3:2006- Design and installation of sheet roof and wall cladding – Plastic
   - AS/NZS 1891.4:2009- Industrial fall-arrest systems and devices. Part 4: Selection, use and maintenance
   - AS/NZS 1892.5:2000-Portable Ladders, Part 5: Selection, safe use and care
   - AS/NZS 4488.2:1997 – Industrial rope systems. Part 2: Selection, use and maintenance
   - National Standard for Licensing Persons Performing High Risk Work, Australian Safety and Compensation Council
   - Certification, Licensing & Qualifications Checklist, WorkSafe Victoria

4. **Definitions:**
   - **Contractor:** Contractors include any service providers/individuals who are not direct employees of DEECD and are providing services/works in relation to maintenance and repair work. This includes contractor employees, subcontractors and sub-contractors employees. Services can be of a long or short duration.
   - **Fall Arrest System:** Equipment or material or a combination of both that is designed, to arrest the fall of a person.
   - **Hazard:** Anything with the potential to cause harm, injury, illness or loss.
   - **Health and Safety Representative (HSR):** An elected employee responsible for representing employees within a Designated Work Group (DWG) on matters relating to OHS.
   - **Management OHS Nominee:** A position nominated by the Workplace Manager to oversee the operational aspects of implementing health, safety and wellbeing initiatives, policies and procedures.
OHS Risk: A description of the likelihood and consequence of a hazard causing injury, illness or damage to property or the environment.

OHS Risk Assessment: The process of determining the likelihood and consequence of injury, disease or illness or damage arising from exposure to a hazard.

OHS Risk Register: A register of the OHS risks identified at the workplace, together with the inherent risk rating, controls and residual risk ratings.

Permit to Work: A formalised process to control work and access to identified high risk tasks and/or areas designed to prevent incidents in the workplace.

Safe Work Procedure (SWP): Are documented procedures that outline:
- The hazards associated with performing a particular task (which may include equipment use, or working in hazardous environments);
- Safety instructions in performing that task including any checks and precautions to be exercised;
- Any required PPE to protect employees, students, contractors and visitors.

Safe Work Method Statement (SWMS): A document which describes the high risk work being performed, the health and safety risks associated with the work and the risk control measures that will be applied to ensure the work is carried out in a safe manner.

Working at Height: Working at a height of over 2 metres (measured from the soles of your feet to the ground). This also applies in situations that involve a hole, shaft or pit into which a person could fall such as trenches, pile holes or service pits.

Work Positioning System: Equipment that enables a person to be positioned and safely supported at a work location for the duration of the task being undertaken at height (e.g. Travel restraint system).

Workplace Manager: The Manager or Principal responsible for the school, central office, regional office or other DEECD workplace.

5. Responsibility:

The Workplace Manager and/or Management OHS Nominee are responsible for:
- identifying working at height hazards within the workplace;
- consulting with HSRs and employees in relation to identifying and managing working at height hazards;
- providing Safely Working at Heights Training for those approved to work at heights;
- providing appropriate height access equipment including portable ladders that are compliant with AS 1892;
- ensuring OHS risk assessments are conducted for identified working at height tasks;
- reviewing the effectiveness of controls for working at height risks in the OHS Risk Register;
- issuing a Permit to Work to a contractor or employee that will be working at height at 2 metres or above;
- complying with legislation relating to working at height.

The functions of the HSRs can include:
Working at Height Procedure

- reporting working at height hazards to the Workplace Manager and/or Management OHS Nominee;
- assisting in completing risk assessments.

Employees and volunteers are responsible for:

- reporting working at height hazards to the Workplace Manager and/or Management OHS Nominee;
- assisting the Workplace Manager and/or Management OHS Nominee with risk assessments;
- complying with SWP and the Permit to Work for working at height.

Contractors are responsible for:

- reporting working at height hazards to the Workplace Manager and/or Management OHS Nominee;
- assisting the Workplace Manager and/or Management OHS Nominee with risk assessments;
- complying with SWMS or SWP and the Permit to Work for working at height.

6. Procedure:

6.1 Identify Hazards Associated with Working at Height

The Workplace Manager and/or Management OHS Nominee, in consultation with HSRs, employees and contractors, are to identify all tasks which involve working at height in the workplace. Examples of working at height tasks include (but are not limited to):

- Working on roofs (see section 6.2);
- Cleaning windows;
- Air-conditioning maintenance;
- Erecting signs and displays;
- Changing lighting in a theatre or gymnasium;
- Ladder work;
- Working near holes, pits, trenches and shafts;
- Working on fragile, slippery or sloping surfaces.

6.2 Working on Roofs

6.2.1 Fragile or Brittle Roofs

Roofs on which employees and/or contractors are required to work on should be as specified in AS1562 for metal, corrugated fibre-reinforced cement and plastic roofs. Any other roofs should be considered as fragile. Where practicable, the Workplace Manager is to install weight-bearing grills above or below fragile/brittle roofs to prevent persons falling. Warning signs are to be displayed at all points of access where a roof or part of a roof comprises fragile or brittle material.

Where it is necessary for work to be carried out on a roof containing fragile material, the Workplace Manager and/or Management OHS Nominee need to ensure the roof is inspected by a contractor to determine the extent of fragile roof material and temporary walkways at least 450mm wide are provided with edge protection.
6.2.3 Steep or sloping roofs

Where work is required to be carried out on a steep roof where the slope exceeds 35 degrees, do not stand on the roof. A steep pitched roof is an inappropriate surface to stand on due to the likelihood of sliding. Schools and other DEECD workplaces with roofs slope exceeding 35 degrees must conduct a risk assessment of the works required and implement appropriate falls prevention control such as using a pitch platform or scissor lift.

7. OHS Risk Assessment working at height

7.1 Employees Working at Heights

No DEECD employee is to work at a height of 2 metres or above unless their role specifically requires them to do so and the requirement has been appropriately documented (i.e. in their position description). If an employee is required to work at height, a Task Based Risk Management Form and Safe Work Procedure (SWP) must be developed and the employee is to be trained in the procedure, and deemed competent before the work can be performed. A Permit to Work – Working at Heights must also be completed by the employee (see section 8) and signed by the Workplace Manager or Management OHS Nominee. This is to be completed in consultation with:

- The HSRs;
- Employees;
- Relevant standards, codes of practice, compliance codes or legislation.

7.2 Contractors Working at Heights

If a contractor is required to work at or above a height of 2 metres a Safe Work Method Statement (SWMS) or equivalent must be supplied by the contractor. A Permit to Work – Working at Heights at 2 metres or above must also be issued to the contractor and signed by the Workplace Manager or Management OHS Nominee.

8. Permit to Work – Working at Heights

The Workplace Manager and/or Management OHS Nominee are responsible for ensuring the Working at Height Procedure and associated Permit to Work system is followed for all work at height.

The Permit to Work - Working at Heights must be signed by the Workplace Manager and/or Management OHS Nominee. The original is to be maintained by the contractor/employee completing the work and a copy maintained by the Workplace Manager and/or Management OHS Nominee. The original is returned at the completion of work and signed off by the Workplace Manager and/or Management OHS Nominee and the contractor/employee. The original copy of the permit is to be filed by the Workplace Manager and/or Management OHS Nominee.

9. Controlling Risks Posed by Working at Height

The Workplace Manager and/or Management OHS Nominee, in consultation with the HSR and employees are to control risks associated with working at height and document control
Working at Heights Procedure

measures identified from the Task Based Risk Management Form, SWP, SWMS and Permit to Work in the OHS Risk Register.

When determining controls to reduce risks, the Workplace Manager and/or Management OHS Nominee must follow the hierarchy of control outlined in the OHS Risk Management Procedure. Examples of controls (from most to least effective) could include:

- eliminating the need to work at heights (e.g. installing air conditioning at ground level, redesigning roof guttering systems to eliminate or minimise the need to collect balls or clean gutters);
- providing passive fall prevention systems (e.g. edge protection, roof walkways and elevated work platforms such as scissor lifts, boom lifts and scaffolding);
- installing roof anchor points and using work positioning systems such as harness/lanyard for either travel restraint or falls arrest systems;
- providing industrial rated ladders and associated ladder stabilising devices;
- providing Personal Protective Equipment (PPE) (e.g. gloves, footwear etc).

Note: All working at heights is deemed to be a high risk and therefore the development of a Safe Work Procedure is required for all tasks working a height.

9.1 Use of Ladders
The Workplace Manager is to ensure any portable ladders comply with AS 1892. All ladders are to be inspected for signs of damage or wear prior to use and must be appropriate for the task. When working at heights, ladders are to be used for access only and must not be used as a work platform.

9.2 Safety Harnesses and Anchor Points
Safety harnesses may not be used unless there is at least one other person at the workplace who has been trained and can perform a rescue if required. Safety harnesses, lanyards anchorages, etc. should comply with, be inspected, certified and re-certified by a height safety inspector and be used in accordance with the relevant requirements of AS/NZS1891.4:2009 Industrial fall-arrest systems and devices and AS/NZS 4488.2:1997 Industrial rope access systems.

For further information on the selection and use of fall arrest devices, the Workplace Manager and/or Management OHS Nominee should contact the OHS Advisory Service on 1300 074 715.

9.3 Scaffolding
All employees and/or contractors involved in scaffolding and rigging work should hold the appropriate certificate of competency in accordance with National Licensing Requirements for Persons Performing High Risk Work and the Victoria Certification, Licencing and Qualifications Checklist. For further information, contact the OHS Advisory Service on 1300 074 715.

9.4 Safely Working at Heights Training
The Workplace Manager and/or Management OHS Nominee are to make sure that employees who are required to work at height are appropriately trained in a competency-based Work Safely at Heights Training Course (RIIWH204D).
Working at Heights Procedure

Attendance at other working at heights training should be provided where practicable including;

- specific licensing and competency requirements e.g. scaffolding, fall arrest device, etc;
- the prevention of falls through safe systems of work;
- the proper use, care and fitting of personal protective equipment;
- the proper use, care and storage of tools and equipment to be used;
- emergency response procedures safe methods of work related to working on brittle and fragile material.

Records of this training are to be recorded and maintained by the Workplace Manager and/or Management OHS Nominee as outlined in the Induction and Training Procedure.

9.5 Falling Objects

Where work at heights may result in the added hazard of falling objects, additional controls may be required. This may include isolating the area immediately below the work and posting warning signs i.e. ‘No Entry’ areas (see OHS Consultation and Communication Procedure) is required and barricading of the area.

10. Volunteers working at heights

For risk controls related to volunteers working at heights refer to the Volunteer and Working Bee Procedure.

11. Reviewing Controls

The Workplace Manager and/or Management OHS Nominee are responsible for reviewing the effectiveness of controls in consultation with HSRs and employees. This review is to be documented on the Task Based Risk Management Form and in the OHS Risk Register.

12. Related Documentation:

OHS Consultation and Communication Procedure
OHS Induction and Training Procedure
OHS Risk Register
OHS Risk Management Procedure
Permit to Work - Working at Heights
Safe Work Method Statement
Safe Work Procedure
Task Based Risk Management Form
Volunteer and Working Bee Procedure

13. Version Control

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### OHSMS requirements
Some wording changes and additions that state that DEECD employees should not be working at a height unless their role requires them to do so i.e. maintenance personnel.

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