

POLICY FOR SAFE WORKING AT HEIGHT AT ALL CHURCHES

General Background

Falls from height (normally 2 metres and above) within the UK account for almost 50% of all fatalities within the construction industry and for a significant number of serious accidents. Fatal injuries can be sustained from a fall from a height of less than 2 metres.

Legal Requirements

The principal legal obligations upon the Churches Conservation Trust is to provide safe access and egress and a safe place of work for all our staff and safe access and egress for the visitors to the Churches within our care. These duties are contained primarily within the **Health and Safety at Work etc Act 1974, Section 2, *General duties of employers to their employees***, sub-section (a): *so far as is reasonably practicable as regards any place of work under the employer's control, the maintenance of it in a condition that is safe and without risks to health and the provision and maintenance of means of access to and egress from it that are safe and without such risks.*

Other applicable legislation includes:

- **Workplace (Health, Safety and Welfare) Regulations 1992, Regulation 13 *Falls or falling objects***, which with the Approved Code of Practice and Guidance also includes specific requirements relating to Fixed Ladders and Roof Work.
- **Management of Health and Safety at Work Regulations 1999, Regulation 3 *Risk Assessment***, which emphasises the requirements of the Health and Safety at Work Act in requiring the Churches Conservation Trust to make a suitable and sufficient assessment of (a) the risks to health and safety of our employees when they are at work; and (b) the risks to the health and safety of visitors to, and contractors working at, the Church premises and Churchyards under our control. These assessments are required to identify the preventative and protective measures in place to control the risk from working at height or access/egress as well as any further action needed to reduce the risk to an acceptable level.
- **Provision and Use of Work Equipment Regulations 1998** applies to ladders, temporary stairs/scaffolding, including access towers and sets out requirements for safe use of equipment as well as information, instruction and training in the correct use.
- **Personal Protective Equipment at Work Regulations 1992** sets out the requirements for the provision of personal protective equipment, such as harnesses to provide protection from falling when working at height and obligations relating to information, instruction and training. Generally, the use of personal protective equipment is a method of last resort when no other, practical safer methods of protection can be provided.
- **Construction (Health, Safety and Welfare) Regulations 1996**
Regulation 5 *Safe places of work*; Regulation 6 *Falls*; Regulation 7 *Fragile Material*; Regulation 8 *Falling Objects*. These Regulations apply only to construction sites and are the primary responsibility of the Principal Contractor in respect of implementation and the provision of a safe place of work.
- **Work at Height Regulations 2004 (as proposed)**
Although these Regulations are still being drafted and subject to further consultation, they are required to be in force by 19 July 2004 to satisfy EU requirements. In essence they will require the Churches Conservation Trust to:
(i) Avoid Risks from work at height; (ii) Select appropriate work equipment for work at height including access and egress. Additionally, they prohibit the use of rope access and ladders as means of access/egress or for work unless, following risk assessment, there is no other safety method available.

Guidance

The principal health and safety guidance for *Work at Height* is contained within:

- (i) **Workplace Health, Safety and Welfare** ~ Approved Code of Practice, Workplace (Health, Safety and Welfare) Regulations 1992 – applicable to workplaces that are not construction sites.
- (ii) **Health and Safety in Construction** ~ applicable to construction work including maintenance and repair.
- (iii) **Health and Safety in Roofwork** ~ applicable to any project involving roofwork and outlining responsibilities of the Trust to provide information relating to existing roofs including: age, construction, fragile areas of roofing, existing access arrangements.

General Requirements for Work at Height/Protection from Falling

The Churches under the care of the Churches Conservation Trust were all constructed prior to Building Regulations or Health and Safety Regulations being introduced. As such, they often have areas where access, or protection from falling, does not comply with current regulatory requirements. The Churches Conservation Trust are required to assess the risk of falling from height to staff and visitors within our Churches and to instigate measures that provide suitable protection and prevention. This applies to stairs, steps, ladders, rood screens, balconies, organ lofts, bell chambers, roof spaces, towers, roofs and any place where there is an unprotected risk from falling.

Church Visitors/Protection from Falling/Restrictions on Access

In order to adequately protect visitors from falls from height, the policy of the Churches Conservation Trust is that visitors to Churches, and especially children, are not allowed access to towers. This policy also applies to rood screens, galleries, organ lofts or bell chambers, where there is inadequate protection from falling.

Churches Conservation Trust Staff/Protection from Falling/Restrictions on Access

A general Risk Assessment has been undertaken for Work at Height and a Safe System of Work developed based on providing all staff with safe access and egress and a safe place of work. **In essence, staff are not authorised to access any area where there is an unprotected risk from falling 2 metres or more.** This applies to access to towers, roofs, roof voids, bell chambers and rood screens.

Access ladders, particularly on Church towers, prior to being used, must be inspected to ascertain whether they are complete and in good condition, adequately secured, provided with protection from falling (hooping from 2500mm vertical height or partial hooping/protection where there is a risk of falling 2 metres or more or contact with bells) and suitable handholds.

Churches with specific Work at Height/Access issues have been scheduled (refer to Appendix 1) and access is not permitted to the areas identified.

APPENDIX 1 : CHURCHES WITH WORK AT HEIGHT/ACCESS ISSUES

Church	Details
Abbotsley	Difficult access from ladder to tower parapet.
Aldwinckle	Slightly difficult access out onto roof.
Alton Priors	Another of those very small tower roof hatches very close to a low parapet and difficult to negotiate when you're long in the back and legs.
Blackburn	Dangers ladders and floors within tower. Very low parapet to roofs.
Blatherwycke	Low parapet.
Bothenhampton	No permanent access to tower. Long aluminium d/e ladder in base of tower has to be placed against underside of bellchamber floor beam before floor hatch can be opened.
Bradstone	Access to tower roof via newel stair interrupted by bellframe. One has to climb through frame to continue access.
Bristol St John	Tower newel stair to nave roof. No handrail.
Bristol St Paul	Very long ladders from tower first floor to upper levels.
Bristol St Thomas	Nave roof space access via 'gangplank' from ringing chamber. Plank slippery especially when wet. No footgrips. Timber in first stages of decay.
Brockley	Recent badly fixed rope to tower newel stair. Rope should have been fitted to newel post – not the walls. Securing rings too far apart, narrowing stair width, especially on descending. Tower roof access door very narrow and difficult to negotiate.
Brookthorpe	Access to upper stages of tower difficult.
Burringham	Difficult bellcote access.
Chute Forest	Vertical iron ladder in base of tower to first-floor trap from which one has to unlock 'errant' padlock. Aluminium ladder to next stage. Rickety d/e wooden ladder to upper stage/spire. At least two rungs missing.
Clapton	Access to tower roof via bells and bellframe. Very low parapet.
Colemore	Ancient wooden ladder to bell (less) turret. Whilst general construction of ladder fairly sound, some rungs are of very slight section.
Conington	Slipper chancel roof.
Copley	High level gutter above clerestorey.
Duxford	Very scary access through central trap hatch into tower (KW doesn't do it anymore).
Elworthy	Short vertical wooden ladder from tower first floor, then through bellframe and further vertical ladder to roof. Heavy lead-covered hatch.
Emborough	Old timber ladder from tower first floor to bellchamber. To this has recently been fitted an aluminium d/e ladder.
Exeter St Martin	New stair to tower roof interrupted by horizontal tie-bars. By-pass iron ladder (almost vertical) from first floor to bellchamber.
Gunton	Very scary access into roof space (KW only does it with Patrick Hansberry).
Hales	Slightly difficult access into first stage of tower.
Haley Hill	High level gutter above clerestorey.
Harewood	(Tower) low parapet to roof.
Hartley Wintney	Access to tower first floor via W gallery. This necessitates climbing over the back seat and then scaling a gimcrack vertical wooden ladder fixed to wall over a 10'0" drop. Said ladder fixings of doubtful efficacy. Thereafter aluminium ladder to bellchamber and fixed iron ladder to roof.
Heckingham	Virtually no parapet.
Hellington	Very long ladder.
Hockwold	Easy access but low parapet.
Kedleston	Odd, awkward access from chancel roof into tower.
King's Lynn	Slippery roofs.
Leicester	High level gutter above clerestorey.
Little Barford	Terrible access but is scheduled to be improved.
Little Witchingham	First floor stage in tower very worm eaten and unsafe.
Lower Basildon	Difficult access to upper stages of tower.

Church	Details
Macclesfield	Dangerous access to upper stages of tower.
Maddington	Tower access via d/e aluminium ladder in base of tower to first-floor trap. No handrails on first floor. Fixed ladder to roof hatch. Safety harness anchor points fitted for working on tower gutters.
Moulton	Difficult access into tower.
North Huish	Final stages of tower roof access via recent wooden steps through bellframe. One tread recently damaged. Small access door to roof making it difficult for those over 5'0" in height. Very low parapets. Safety harness anchor points installed.
North Barningham	Long ladder.
Northampton	High level gutter above clerestorey.
Northover	Another very small access door to tower roof difficult to negotiate. Very low parapet.
Orcheston	Unfixed vertical ladder in base of tower to first floor. Ladder can be pulled out at angle but is heavy. Gymnastics via bellframe to short fixed vertical ladder to tower roof. Horizontal stainless steel bars at access point, otherwise low parapet.
Parracombe	No handrail for access up the tower. Ladder kept in vestry.
Pendock	Dangerous access to tower (vertical ladder and very heavy hatch).
Preston Deanery	Very long vertical ladder.
Privett	Access to base of spire (access not required on regular basis) requires squeezing past one of the larger bells.
Redbourne	Difficult lone access.
Stocklynch	The newel stair is interrupted by the bellframe. Gymnastics required to gain access to tower roof hatch whilst standing on one of the bell headstocks.
Stratford Tony	Awkward tower roof hatch on sloping roof. Low parapets and narrow gutter.
Stretton	Difficult access from bellchamber to roof, long ladder and padlock from tower base.
Swaffham Prior	Slippery roof ladder.
Tarrant Crawford	Vertical wooden ladder from ground to tower first floor. Hatch in first floor now fitted with padlock in which it is difficult to engage key whilst holding onto ladder with one hand.
Torbryan	Access to bell.
Toxteth	Low parapet to roof.
Upton Tower	Heavy wooden pole ladder in base of tower needs positioning to first floor 'landing stage'. Wooden ladder to intermediate stage, neither of which has handrails. Fairly heavy tower roof hatch.
Warburton	Unsafe ladder giving access to upper stages of tower.
Waterloo	Low parapet to roof.
West Ogwell	Small access door to tower roof and close to parapet, making it difficult to get out, especially for those long in the back and legs.
Whitcombe	?
Wolfhamcote	Consider harness for vertical ladder to tower.
Yazor	No reasonable access to upper stages of tower
York Holy Trinity	Long vertical ladder into tower.

CHURCHES CONSERVATION TRUST · WORK AT HEIGHT · GENERAL RISK ASSESSMENT

Task/operation and location : Inspection and Survey Work/Work at height; use of cameras/tape recorders (including any equipment in use)		
Hazard	Risk Rating	
	Without controls	With controls
<ul style="list-style-type: none"> Falls of staff/employees from ladders, towers, roofs, through fragile materials such as ceilings/rotted floors, or from unprotected areas (bell chambers, rood screens, organ lofts). 	High	Low
<ul style="list-style-type: none"> Falling equipment 	High	Low
Harm		
<ul style="list-style-type: none"> Significant injuries or fatalities from falls · Injuries from falling equipment 		
Persons in danger		
<ul style="list-style-type: none"> Staff working at height · Other staff or visitors within the Church premises 		
Control Procedures for Staff		
<ul style="list-style-type: none"> Safe means of access within towers using existing ladders if in good condition and adequately secured and guarded. Access roofs including tower roofs restricted to areas where there are suitable and adequate parapets/guarding from falling. If safe access/suitable protection from falling is not available then staff must not proceed and the Head of Conservation is to be advised. Staff must not at any time put either their own safety at risk or the safety of any colleague working with them. If in doubt, do not proceed. Edge protection/protection from falling must be provided at all openings or edges where falls of two metres or more can occur. Lone worker ~ inspection or survey work at height should not be undertaken by lone workers. No access/work at height is to be undertaken if the area to be visited is slippery/wet, icy or if there are strong winds. 		
Protection for Visitors		
<ul style="list-style-type: none"> If necessary (Church has visitors) and there is a risk of falling objects (loose material, equipment). Signs (“Overhead Work”) must be placed below the area of inspection and the area barriered off. 		
Personal Protective Equipment		
<ul style="list-style-type: none"> Staff are to be provided with safety footwear, which has a good grip. 		
Specific legislation:		
<ul style="list-style-type: none"> Health and Safety at Work etc Act 1974 Management of Health and Safety at Work Regulations 1999 Workplace (Health, Safety and Welfare) Regulations 1992 Provision and Use of Work Equipment Regulations 1998 Personal Protective Equipment at Work Regulations 1992 Construction (Health, Safety and Welfare) Regulations 1996 		
HSE and other guidance		
<ul style="list-style-type: none"> <i>Health and Safety in Roofwork</i> HS(G)33 · <i>Health and Safety in Construction</i> HS(G)150 BS5395: Part 3 : <i>1985 Stairs, Ladders and Walkways</i> · Work at Height Regulations (proposed) 		
Information, instruction and training		
<ul style="list-style-type: none"> All staff are to be inducted into the safe system for work at height. 		
Emergency procedures		
<ul style="list-style-type: none"> Emergency procedures are to include raising alarm if an incident occurs and provision for the rescue of staff from heights. 		
Monitoring procedures		
<ul style="list-style-type: none"> Work at Height should be monitored to ensure that control measures are adequate. 		

CHURCHES CONSERVATION TRUST · WORK AT HEIGHT · SAFE SYSTEM OF WORK

Church:		
1.	Activity to be undertaken: Inspection/Survey Work	
2.	Location:	
3.	Does the activity involve work at height (work at height applies where there is a risk of falling 2 metres or more)	Yes <input type="checkbox"/> No <input type="checkbox"/> (✓ as appropriate)
4.	If yes , can the inspection/survey work be undertaken remotely by using binoculars or cameras.	Yes <input type="checkbox"/> No <input type="checkbox"/> (✓ as appropriate)
5.	If no , is safe access to the work area available.	Yes <input type="checkbox"/> No <input type="checkbox"/> (✓ as appropriate)
6.	If no , the activity should not be undertaken and the situation reported to the Head of Conservation. Reported by ☎ Yes <input type="checkbox"/> No <input type="checkbox"/> Memo Yes <input type="checkbox"/> No <input type="checkbox"/> Date:	
7.	If safe access is available is this by: (✓ as appropriate, if different access required ✓ all respective types)	Stairs <input type="checkbox"/> Steps <input type="checkbox"/> Ladders <input type="checkbox"/> Protected walkway <input type="checkbox"/> Scaffolding <input type="checkbox"/> Access tower <input type="checkbox"/> Mobile elevating platform <input type="checkbox"/>
8.	Access by stairs/steps: Are the steps in reasonable condition, not slippery or rotted, reasonably visible and is there adequate protection from falling in terms of balustrading/walling or guard rails.	Yes <input type="checkbox"/> No <input type="checkbox"/> (✓ as appropriate)
	If yes , Lone Worker Arrangements to apply if stairs/steps used for access. If no , the activity should not be undertaken and the situation reported to the Head of Conservation. Reported by ☎ Yes <input type="checkbox"/> No <input type="checkbox"/> Memo Yes <input type="checkbox"/> No <input type="checkbox"/> Date:	
9.	Access by ladder: Is the ladder(s) in good condition/complete, adequately secured, with sufficient handholds at landings and resting on a suitable surface with safe access.	Yes <input type="checkbox"/> No <input type="checkbox"/> (✓ as appropriate)
	If yes , Lone Worker Arrangements to apply if ladder used for access. If no , the activity should not be undertaken and the situation reported to the Head of Conservation. Reported by ☎ Yes <input type="checkbox"/> No <input type="checkbox"/> Memo Yes <input type="checkbox"/> No <input type="checkbox"/> Date:	
10.	Protected Walkway: Is the walkway/access route in good condition, not slippery and with adequate secure parapets or other suitable edge protection/protection from falling.	Yes <input type="checkbox"/> No <input type="checkbox"/> (✓ as appropriate)
	If yes , Lone Worker Arrangements to apply if walkway used for access. If no , the activity should not be undertaken and the situation reported to the Head of Conservation. Reported by ☎ Yes <input type="checkbox"/> No <input type="checkbox"/> Memo Yes <input type="checkbox"/> No <input type="checkbox"/> Date:	
11.	Scaffolding/Access Towers: Is there a Handover Certificate confirming the scaffolding has been erected correctly and has the scaffolding been inspected/certified safe for use.	Yes <input type="checkbox"/> No <input type="checkbox"/> (✓ as appropriate)
	If no , do not proceed or use the scaffolding/access tower. If yes , Lone Worker Arrangements to apply if scaffolding/access tower used for access.	
12.	Mobile Elevating Platforms (MEP): Is there a trained and certificated operator and is the equipment positioned on a suitable level surface (spreader plates should always be used in churchyards due to the presence of graves/voids below the surface).	Yes <input type="checkbox"/> No <input type="checkbox"/> (✓ as appropriate)
	Is the area of operation free from any overhead cables (especially electricity) or any other obstruction (overhanging structure, trees).	Yes <input type="checkbox"/> No <input type="checkbox"/> (✓ as appropriate)
	Does the working platform have adequate guard rails and toe boards.	Yes <input type="checkbox"/> No <input type="checkbox"/> (✓ as appropriate)
	If yes , to all questions proceed, if no to any questions do not proceed. Fully safety harnesses although not compulsory, should be worn and attached when using mobile access platforms.	
13.	External Access: If the access is slippery, either due to water/ice/moss/leaves or if their are strong/gale force winds then do not proceed out onto towers, roofs or any other external exposed areas.	