



WORKING AT HEIGHT

Department of Labour Health and Safety Position Paper

Issued 22nd November 2011

■ Purpose

Falls contribute to an unacceptable number of serious harm accidents in the Construction industry. More injuries occur from low falls of less than 3 metres than from high falls.

This document sets out the Department of Labour's position on the application of the Health and Safety in Employment Act 1992 to situations with the potential for a fall from height. It is primarily focussed on work in the construction sector but the principles apply to working at height in any workplace.

The Department wants to make it clear that doing nothing to prevent a fall from height is not an option.

■ Background

Preventing falls from height is a priority for the Department of Labour and it expects employers and contractors, with staff working at height, to actively manage this significant hazard.

The Department review of the Workplace Health and Safety Strategy to 2015 recommended the development of five Sector Action Plans to focus on those sectors with high levels of fatality and serious harm. The intent of the action plans is for the sector and government agencies to work in collaboration to reduce the work toll from 2010 to 2013. One of these plans is the Construction Sector Action Plan.

■ Department's Position

The Health and Safety in Employment Act 1992 sets out the performance required of duty holders. People with a duty must take all practicable steps to ensure the safety of workers when they are exposed to a fall, or where the hazard of a fall exists.

The HSE Act sets out a hierarchy of controls to be considered in sequence. This is the "Eliminate, Isolate, Minimise" process.

Where the hazard of a fall exists, duty holders shall consider:

1. Whether the job can be done without exposing persons to the hazard (**eliminate**). This can often be done at the design, construction planning and tendering stages.
2. If elimination is not practicable then steps should be taken to **isolate** people from the hazard. This can be achieved using safe working platforms, guardrails systems, edge protection, scaffolding, elevated work platforms, mobile scaffolds, barriers to restrict access.
3. If neither elimination nor isolation are practicable then steps should be taken to **minimise** the likelihood of any harm resulting. This means considering the use of work

positioning systems or travel restraint systems, safety harnesses, industrial rope access systems, safety nets, air bag/bean bag systems, and catch platforms.

■ Preventing falls from roofs

Where the hazard of working at height cannot be eliminated, some form of edge protection should be used as a means of isolating workers from a fall. This includes single storey buildings and structures.

If this is not practicable then the use of scaffolding, elevated work platforms or temporary work platforms are more acceptable alternatives.

■ Preventing falls from ladders

Ladders should be used as a means of access, and for short duration maintenance work such as changing light bulbs or touching up paint.

All too often, a ladder is used without thought to whether it is the safest and most effective equipment for the job.

People using ladders must be trained and instructed in the selection and safe use of ladders. Ladders must be regularly inspected and well maintained to ensure they are safe to use.

In a workplace, a ladder must be manufactured to an industrial standard AS/NZ 1892.1:1996.

■ Regulation 21 of the Health and Safety in Employment Act Regulations 1995

There is a reasonably good understanding amongst many people in building and construction that if the distance of possible fall is greater than 3 metres then steps must be taken to prevent any fall from occurring.

What is not so well understood is that even if a possible fall is less than 3 metres the HSE Act requires that if there is any chance of harm resulting, steps must be taken to prevent the fall from occurring.

Regulation 21 is the source of the often-quoted "3 metre rule". It is mistakenly believed that no further action is needed where a person faces a fall of less than 3 metres. That belief is wrong and ignores the overarching duties in the Act.

■ Information

Further information about how to prevent falls from height can be obtained from the Department of Labour at www.dol.govt.nz

