



Work at Height Policy

This procedural document supersedes: CORP/HSFS 32 v.1



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Amendment Form

Please record brief details of the changes made alongside the next version number. If the procedural document has been reviewed **without change**, this information will still need to be recorded although the version number will remain the same.

Version	Date Issued	Brief Summary of Changes	Author
Version 2	January 2023	<ul style="list-style-type: none"> • Amended to reflect change of author • Amended to the up-to-dated version of the APD template. 	Gary Hewit
Version 1	February 2019	<ul style="list-style-type: none"> • This is a new procedural document, please read in full 	N P Donegan

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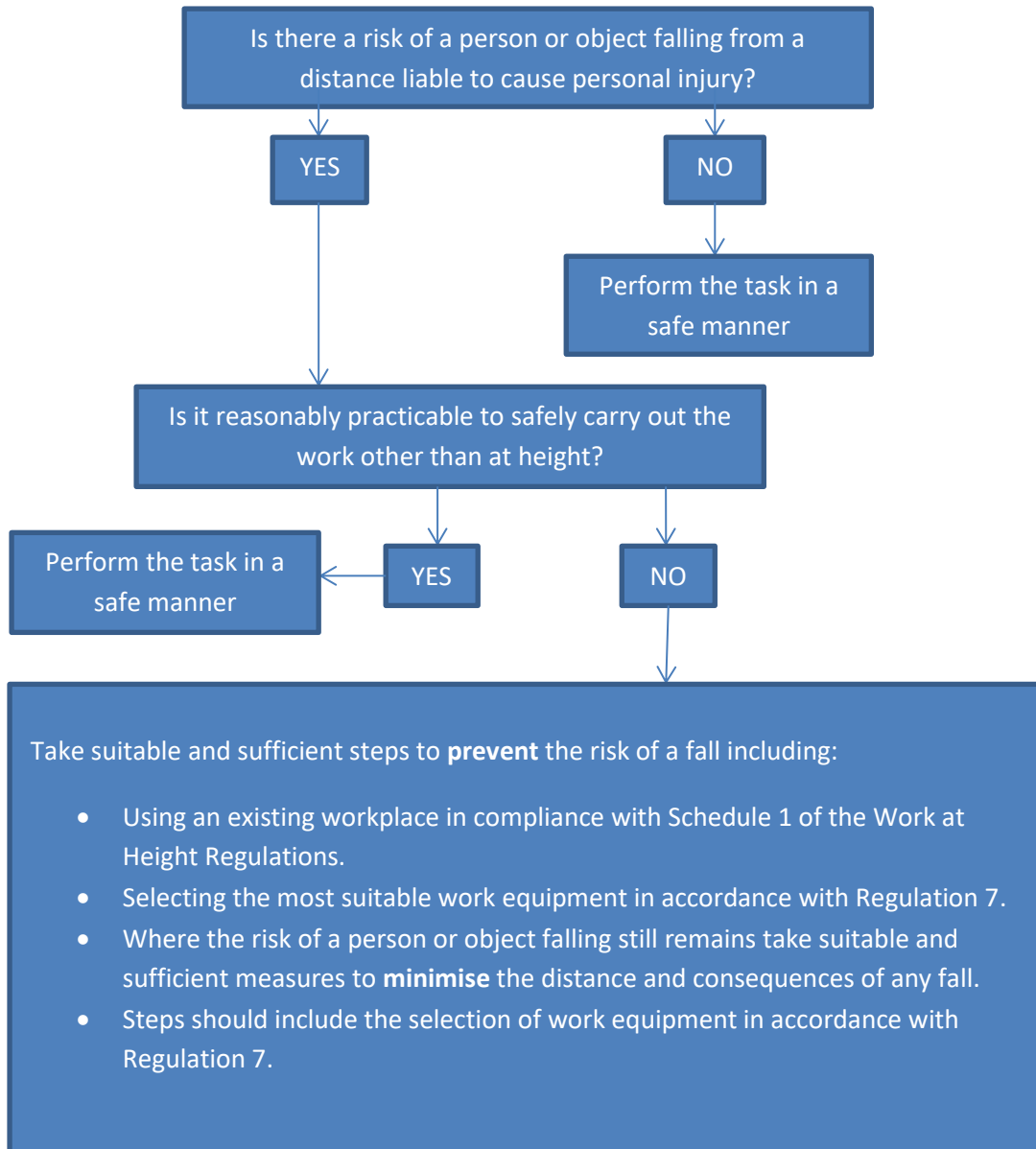
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WORKING AT HEIGHT - PROCESS AT A GLANCE



1 INTRODUCTION

This Policy document is not intended as a substitute for The Work at Height Regulations 2005 but as an introduction to them. Those who manage or undertake work at height at any of Doncaster and Bassetlaw Teaching Hospital NHS Foundation Trust (DBTH) or any of its properties must do so in accordance with this Policy.

This Policy is incorporated under the Health and Safety Policy CORP/HSFS 1 and in accordance with The Work at Height Regulation 2005.

DBTH will take all reasonably practicable measures to ensure all workplaces under their control are safe without unnecessary risk from working at height to any person needing to access them or are affected by such work.

Compliance with this Policy or Safe Operating Procedure (SOP) is mandatory for all employees, contractors, self-employed persons, and visitors who manage or undertake work at height.

Work at height is defined as work in any place a person could fall a distance liable to cause personal injury unless preventative action is taken. This could be above or below ground or floor level.

2 PURPOSE

The purpose of this Policy is to ensure that DBTH provides a safe working environment for any person who may enter the site by:

- Ensuring all potential hazards from working at height in the workplace are identified.
- Any risk to a person's health and safety is adequately controlled and reduced to the lowest level reasonably practicable.
- Where necessary the appropriate risk assessments and risk reduction plans are in place and followed.

3 DUTIES AND RESPONSIBILITIES

3.1 Board of Directors

Has overall responsibility for ensuring the management of Health and Safety. They receive assurance by the Audit and Non-Clinical Risk Committee (ANCR).

3.2 Chief Executive

Has specific responsibility for giving effect for Health and Safety matters and for ensuring that this Policy is implemented.

3.3 Director of Estates and Facilities

Is the Executive Team member and nominated person for Health and Safety.

The Director of Estates and Facilities is responsible for ensuring that any premises owned or leased by the Trust are safe and do not present a hazard to employees and others using the Trust premises for approved uses. The Director of Estates and Facilities will also ensure that any premises used by the Trust are provided and maintained in accordance with this Policy.

3.4 Head of Compliance

Has responsibility for ensuring that this Policy allows the Trust to comply with their legal responsibilities.

The Head of Compliance has a duty to ensure that any work at height is carried out in accordance with the Trust Health and Safety Policy as well as The Work at Height Regulations. Part of this role is to ensure that appropriate risk assessments have been undertaken.

3.5 Managers

Have a duty to implement this Policy, to maintain and where possible to improve Health and Safety standards in the workplace and in particular working at height.

It is a manager's responsibility to ensure that every workplace under their control is adequately maintained and repairs carried out. This may be in-house or by specialist contractors.

The manager must ensure that suitable and sufficient risk assessments have been carried out and Safe Operating Procedures/Method Statements are in place.

3.6 Employees

All employees have a responsibility to comply with this Policy and any actions arising from its implementation.

Should employees become aware that any work at height hazard is not covered by a risk assessment, they must report it to their manager or supervisor.

They should also take steps to minimise the risk themselves.

3.7 Health and Safety Advisor

Has a responsibility for helping to ensure that by following this policy, it allows the Trust to comply with their legal obligations and reduce the risk of injury to employees or contractors.

4 PROCEDURE

The overriding principle of working at height is to as far as is reasonably practicable prevent any person falling a distance liable to cause personal injury.

The hierarchy for working at height is as follows: -

- Avoid the risk by not working at height. Where it is reasonably practicable to carry out the work safely other than at height do so.
- Prevent falls – where work at height cannot be avoided the risks must be assessed and procedures implemented to allow the work to be done whilst preventing so far as is reasonably practicable people or objects falling. This might include ensuring that the work can be undertaken safely from an existing place of work or choosing the right work equipment to prevent falls e.g., Mobile elevated work platform (MEWP).
- Mitigate the consequences of a fall – where the risks of people or objects falling still remains steps must be taken to minimise the distance and consequences of such falls. This will also involve the selection and use of work equipment and preventing people not involved with the work entering the hazardous area.

At all stages a combination of protective measures e.g., guard rails, airbags, and nets must be given precedence over personal protective measures such as safety harnesses.

The work at Height Regulations 2005 (as amended) requires you to:

- Assess the risk to determine a safe way to work.
- Follow the above hierarchy.
- Plan and organise the work considering such things as emergency measures, possible weather, and environmental conditions.
- Make sure that those working at height are competent to do so, understand the risks and the risk assessments are made aware of any Trust Policies and Procedures.

5 PLANNING WORK AT HEIGHT

The Work at Height Regulations 2005 (as amended) require you to plan your work correctly and to ensure that it is carried out in a safe manner.

The employee and/or the employee's representatives should be involved at all stages when planning any work at height.

Consulting with the employees will encourage them to be more aware of risks from work at height and their duties under health and safety law. It will also help you to comply with your duties as a manager or supervisor.

5.1 Provide Supervision

Evaluate the findings of the risk assessment plus the experience and capability of the people involved in the work. A worker may be trained to a nationally accredited standard but will still need to acquaint with the layout and peculiarities of the site. They will also need the tasks required of them carefully and fully explained.

Make sure that those affected by the work understand the risk assessment and what they must do to comply with it. This may be through toolbox talks or briefings to make sure workers are aware of the hazards and when they should ask for further assistance. The activity may also affect other people on site not just employees, inform and discuss with these people how the task is to be undertaken and the affects that it may have on them.

5.2 Plan for Emergencies and Rescue

If required have a rescue plan in place before the work begins. This plan should be reviewed throughout the length of the project and updated if there are any substantial changes to the work.

The plan needs to consider the possible risks to rescuers.

You should not assume that the emergency services will be able to affect a rescue in all situations, especially within the necessary timescale.

6 RISK ASSESSMENT

The risk assessment should consider the effects that the weather can have on outdoor work at height.

The Provision and Use of Work Equipment Regulations 1998 (PUWER98) require that work equipment is suitable for the conditions intended and that suitable and sufficient lighting is provided at any place where work equipment is in use.

Lightning, wind, rain, snow, ice, temperature, and sun will change the working conditions during the work, this may increase the risks that need to be addressed. Protective gloves, sun block, non-slip footwear wet-weather clothing may help but your risk assessment should consider the wider aspects such as could bulky clothing get tangled in machinery or make access/egress more dangerous. Heat exhaustion must also be considered in hot and humid conditions.

7 USE OF APPROPRIATE WORK EQUIPMENT

The Work at Height Regulations 2005 recognises that work at height can be undertaken in various ways using a wide range of work equipment. The choice of equipment will depend on the risk assessment. Whatever equipment is selected it must be of sound construction, suitable material, be of adequate strength and free from obvious defects.

7.1 Choosing the Right Equipment for the Task

The choice of equipment involves “reasonable and practical” it must prevent a person or object falling or if this cannot be achieved, mitigate the distance and consequences of such falls.

Careful consideration must be given when making the choices – A ladder may reach the workplace but if workers need to climb it for a long duration or with heavy bulky equipment, scaffolding is likely to be more appropriate.

On the other hand, the risks of erecting scaffolding should be considered especially for short duration work where a Mobile Elevating Work Platform (MEWP) might be more appropriate.

7.2 Selecting the right equipment for access and egress

Selecting equipment for access or egress will depend on the particular use envisaged. For frequent access/egress you should consider more permanent arrangements e.g., if a scaffold is to be in place for a long duration the erection of a staircase with handrails would be more appropriate than a tied-off ladder, especially if bulky loads are to be carried up or down. You should also consider the use of hoists or other methods if this will reduce the risk of falls.

Systems of work or other means of access/egress must be designed so that workers do not have to climb over guard rails etc. If frequent access/egress is required, then it may be appropriate to install gates which will allow safe access/egress but also protect those working on the scaffold by providing a barrier. For those working on high rise buildings which may take a considerable amount of time to complete, the use of mast climbing work platforms or suspended platforms may be a better option. These should only be erected, altered, operated or dismantled by trained, competent persons according to the manufacturer’s instructions.

MEWP’s should not generally be used as a means of access/egress to or from another structure or surface – climbing out of MEWPs in these circumstances has injured several people.

However, they may be used for this purpose if they have been specifically designed for it or as part of a properly planned operation where, in exceptional circumstances it is the safest way to gain access or egress to a place of work at height. In such circumstances suitable and sufficient fall protection should be worn and correctly anchored.

8 WORK EQUIPMENT

Ladders including fixed ladders and stepladders are commonplace, however people often seriously underestimate the risk involved in using them with catastrophic results. Falls from

ladders used at work is one of the largest causes of fatalities and major injuries (Health and Safety Executive) (HSE)

There are many types and sizes of ladders - portable, step, suspended, interlocking, extension, mobile and fixed ladders. They must comply with the Work at Height Regulations 2005. Ladders are classified as work equipment under the Provision and Use of Work Equipment Regulations 1998 (PUWER) and therefore must be suitable for the intended task.

8.1 Ladders

Should only be used as work equipment either for access or egress. They can be used as a place of work where a risk assessment shows that the use of other work equipment is not justified because of the low risk and the short duration of the work or unalterable features of the work site. The risk assessment is essential and should take into consideration not only those using the ladder but others who could be affected such as passers-by. The safety of sole workers who use ladders such as window cleaners, depend greatly on their correct use, and adequate training is essential. Safety should not be compromised by the haste to complete a job and all ladders must only be used in accordance with the manufacturer's instructions. For instance, where a ladder is too long and is cut down to make it fit, it is no longer fit for purpose as it is not in its original state.

If ladders are to be used to work from make sure:

- A secure handhold and secure support are available at all times e.g., 3 points of contact at all times.
- The work can be reached without stretching.
- The ladder can be secured to prevent slipping.
- It is tempting to try and finish the work without going up and down moving the ladder but overreaching when working from a ladder is a major cause of falls even for experienced operative.

8.2 Harness Equipment

Harness equipment will only be provided as a result of a risk assessment and must comply with relevant current standards. Request must be made to the Estates management for routine testing and inspection requirements.

Note: Where a harness is used, if a person falls there is a risk of suspension trauma which is defined as:

- The worker is suspended in an upright position, legs dangling.
- The safety harness and straps exert pressure on the leg veins, compressing them and restricting blood flow back to the heart
- The harness keeps the person in an upright position, regardless of loss of consciousness which can kill them.

- If harness equipment is to be used a rescue plan must be in place and ready to use.

8.3 Additional Equipment

Listed below are other items of equipment may be used and must comply with this policy.

- Kick stools (elephant's foot).
- Step ladders (irrespective of size).

Note: Chairs and desks are NOT suitable equipment for working at height.

9 WORKING AT HEIGHT COMPETENCY

Regulation 5 of the Work at Height Regulations 2005 requires that any person undertaking work at height must be competent to do so, or if being trained supervised by a competent person. Competency is defined as a combination of experience, training, appropriate practical and theoretical knowledge, which combined should enable a person to:

- Undertake safely their defined activity at their level of responsibility.
- Fully understand any potential risks related to the work activity including equipment for any tasks that they are undertaking.
- Detect any defects or omissions and recognise any implications for health and safety with the aim of specifying appropriate remedial actions that may be required in relation to their work activities.

Note: This could include refusing to carry out a particular task if the risk is identified as being too great, waiting for reassessment, or risk reduction plan.

10 FRAGILE SURFACES

Risks posed by fragile surfaces must be managed safely. E.g., surfaces where there is a risk of a person or object falling through it, these surfaces may be either close to or part of the structure on which work is to be done and will include vertical or inclined surfaces.

Any surface from which work at height is carried out must be strong and stable enough so that any foreseeable loads, persons plus any materials/loads they may be required to carry placed on it, will not lead to collapse.

You must consider whether work on or near a fragile surface could be carried out in a way which does not expose workers to risks by having to stand near them e.g., can the work be done from below? You must consider the whole installation, including any fixtures and fittings of the surface material.

It is imperative to consider the dynamic forces of the person or object falling on to the surface and any effect of ageing on the surface material and any deterioration due to weather, environment, impact, and any structural alterations.

Roof lights in non-fragile roofs may be difficult to see, particularly if they have been painted over and in bright sunshine. Remember that fragile surfaces may also be vertical or nearly so, as well as horizontal. For example, some skylights (mainly older) may have large vertical glass sections through which people or objects can fall.

If the work requires regular or occasional access/egress where there is a fragile surface, labelling, permanent fencing, guarding or other means to prevent the risk of falls must be in place.

Note: Where a risk of falling remains, fall arrest equipment will be required, so far as is reasonably practicable.

11 FALLING OBJECTS

If it is identified that a falling object could injure someone, steps need to be taken to ensure that this is prevented.

Ways of preventing objects being knocked off or rolling off the edge could include, toe boards, netting or solid barriers, or by attaching them to people or fixed structures. Any guard (including brick guards) must be robust and require a mid-rail. Even a mobile phone falling a short distance can cause serious injuries if it strike someone.

The use of netting can be one method of managing this risk, another could be to leave all unnecessary items or equipment stored in a safe place prior to working at height.

Rubbish chutes used to dispose of materials from height must be properly erected and managed so that the material or debris does not hit anyone either as it goes down the chute or when it hits the skip/pile at the bottom. Materials or debris must not be thrown from the structure, this is an illegal practice often known as "Bombing".

It is important to ensure that workers understand the risks of objects falling and injuring people during the use of hoists, ropes or hand to hand methods of moving materials or work equipment such as scaffold clips.

All loads and equipment need to be safely stored so that they do not collapse or fall at any time to cause injury. The method of storing materials on work surfaces must take into account that the workers access smaller amounts when at height and any surplus materials or equipment must be stored at ground level. This requires special attention in relation to any duty placed on a person under the employer's control.

12 DANGER AREAS

Where workers are adjacent to an area where there is a risk of falling or being struck by a falling object, people whose presence is not required in the area must be prevented from entering the area so far as is reasonably practicable.

The Work at Height Regulations 2005 requires that clear demarcation of the area is given, for example by signing or physical isolation to alert any person who might require access to the area of the need to take the appropriate actions such as head protection or fall arrest equipment.

13 INSPECTION

Equipment for work at height requires regular inspection to ensure that it is safe to use, marking such equipment may be required to make sure that it is obvious when the next inspection is due. Formal inspection as required by the regulations must not be a substitute for routine maintenance or pre-use checks. Inspection does not normally include the checks that are part of the maintenance regime although certain aspects may be common.

The Work at Height Regulations 2005 requires that, where the risk assessment under Regulation 3 of the Management of Health and Safety at Work Regulations (1999) identifies a significant risk, suitable and sufficient should be carried out.

A significant risk is one that could foreseeably result in a major injury or worse, which is likely for the majority of falls from height.

The purpose of an inspection is to identify whether the equipment is fit for purpose and can be used safely for its intended purpose and that any deterioration is detected and remedied before it results in unacceptable risks.

An inspection can consist of a simple visual check, tactile check to a comprehensive inspection requiring dismantling/testing. A competent person should decide the nature, frequency and content of any inspection considering such factors as the type of equipment, how and where it is used as well as the risk of deterioration.

Further information is available in INDG 367 (HSE Guidance) Inspecting Fall Arrest equipment made from webbing or rope, for rope positioning systems that require inspection prior to use. Lifting equipment covered by the Lift Operations and Lifting Equipment Regulations 1998 (LOLER) will also be subject to thorough examination by a competent person (see Lifting Operations and Lifting Equipment Regulations ACoP and Guidance).

Regulation 12 of the Work at Height Regulations 2005 requires that a weekly inspection of scaffolding is carried out by a competent person. Inspections are also required following high winds or if the scaffolding is struck by a vehicle etc.

Where work equipment is hired to the user then it is important both parties agree in writing exactly what inspections have been carried out and that the information is readily available and passed on to the workers, Further details on the inspection of work equipment are in Regulation 6 of the Provision and Use of Work Equipment Regulations 1998 Approved Code of Practice and Guidance.

Regulation 13 of the Work at Height Regulations 2005 requires that the surface conditions and any other permanent features where work at height will be undertaken are checked on each occasion before any work takes place to identify whether there are any obvious defects.

Thorough examination under the Lifting Operations and Lifting Equipment Regulations (1998) (LOLER) – Lifting equipment used for people or loads which, is subject to Regulation 9 of LOLER requires a more detailed and comprehensive inspection – called a thorough examination – which may include some dismantling and/or testing.

It is important to remember that some items of equipment for work at height for example window cleaning platform hoists will have some parts subject to a thorough examination under LOLER, but there may be others such as guard rails and floors which will not be subject to LOLER and may need to be inspected more often.

14 MAINTENANCE

Inspection and thorough examination are not a substitute for properly maintaining equipment. The combination of the information gleaned from the maintenance process, inspection and thorough examinations should be complementary.

A maintenance log should be maintained and kept up to date. It should be available for the competent person undertaking the thorough examination or inspection.

Planned Preventative Maintenance (PPM) will include the changing of parts or making required adjustments at pre-set intervals to ensure that the risks of deterioration or failure of the equipment is minimised.

Condition based maintenance involves monitoring the condition of safety-critical parts and carrying out maintenance as required to avoid hazards that could otherwise occur. This would include for example the safety critical parts of hoists or other lifting equipment.

Note: The frequency of any maintenance will depend on the type of equipment, the conditions under which it is used, the manufacturer's instructions and any legislative requirements.

Where work equipment hired to the user, it is vital that both the person responsible for hiring the equipment and the hire company which party will undertake any safety related inspections and maintenance. This is important for any equipment on long term hire and the terms of agreement between the hirer and the user who should record this responsibility.

Both parties should agree in writing exactly what they are responsible for, and this should be communicated to the workers.

All those undertaking any maintenance work must be competent to do so. They must have the skills, knowledge, and experience of the relevant equipment. They must be able to identify any defects/potential defects and be aware of the impact on the equipment as well as what action to take as a result.

15 RECORD KEEPING

Regulation 12 of the Work at Height Regulations 2005 requires employers to record inspections that relate to the safety of the site or work equipment so that in the event of an accident/incident they can provide useful information.

A Health and Safety inspector may legally ask to see these records, as such they must be stored in a way that is accessible but tamperproof. Records may be kept electronically as long they are able to be printed out.

16 TRAINING/SUPPORT

For DBTH employees training should be in accordance with SET and any Training Needs Analysis identified, they may also require specialist training to be a competent person for undertaking work at height.

Any contractors undertaking work at height must be competent for the work which they are undertaking. Their company must provide copies of any training information related to work at height and they must provide us with written confirmation of staff competency.

17 MONITORING COMPLIANCE WITH THE PROCEDURAL DOCUMENT

What is being Monitored	Who will carry out the Monitoring	How often	How Reviewed/ Where reported to
Any work at height e.g., from steps or stepladders, portable ladders, work platforms and scaffolding.	A competent person Heads of Operational Estates/Departments Estates managers or officers Departmental managers Health and Safety	Daily or weekly as agreed.	Visually and reported to Head of estates or department head, who will ensure that remedial action is undertaken. Trust Health and Safety Committee.
The condition and safety of scaffolding.	A competent person Heads of Operational Estates. Estates managers or officers Health and Safety	Weekly or following high winds or any impact damage to scaffold.	Visually and reported to Head of estates who will ensure that remedial action is undertaken. Trust Health and Safety Committee.

18 DEFINITIONS

DBTH – Doncaster and Bassetlaw Teaching Hospitals NHS Foundation Trust

LOLER – Lifting Operations and Lifting Equipment Regulations

PUWER – Provision and Use of Work Equipment Regulations

SET – Statutory and Essential Training

TNA – Training Needs Analysis

WAHR – Work at Height Regulations

19 EQUALITY IMPACT ASSESSMENT

The Trust aims to design and implement services, policies and measures that meet the diverse needs of our service, population, and workforce, ensuring that none are disadvantaged over others. Our objectives and responsibilities relating to equality and diversity are outlined within our equality schemes. When considering the needs and assessing the impact of a procedural document any discriminatory factors must be identified.

An Equality Impact Assessment (EIA) has been conducted on this procedural document in line with the principles of the Equality Analysis Policy (CORP/EMP 27) and the Fair Treatment for All Policy (CORP/EMP 4).

The purpose of the EIA is to minimise and if possible, remove any disproportionate impact on employees on the grounds of race, sex, disability, age, sexual orientation, or religious belief. No detriment was identified. ([See Appendix 1](#))

20 ASSOCIATED TRUST PROCEDURAL DOCUMENTS

CORP/HSFS 1 - Health and Safety Policy, including the Health and Safety Risk assessment form.

CORP/HSFS 3 - Lone Workers Policy

CORP/HSFS 14 - Fire Safety Policy

CORP/HSFS 30 - Management of Contractors Policy and Procedures

CORP/HSFS 31 - Permit to Work Policy and Procedures

CORP/EMP 4 - Fair Treatment for all

CORP/EMP 27 – Equality Analysis Policy

PAT/PA 19 - Mental Capacity Act 2005 – Policy and Guidance, including Deprivation of Liberty Safeguards (DoLS)

PAT/PA 28 - Privacy and Dignity Policy

21 DATA PROTECTION

Any personal data processing associated with this policy will be carried out under 'Current data protection legislation' as in the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR) 2021.

For further information on data processing carried out by the trust, please refer to our Privacy Notices and other information which you can find on the trust website:

<https://www.dbth.nhs.uk/about-us/our-publications/information-governance/>

22 REFERENCES

Lifting Operations and Lifting Equipment Regulations (1998)

Management of Health and Safety at Work (1999)

Provision and Use of Work Equipment Regulations (1998)

Work at Height Regulations (2005)

APPENDIX 1 - EQUALITY IMPACT ASSESSMENT PART 1 INITIAL SCREENING

Service/Function/Policy/Project/Strategy	Division	Assessor (s)	New or Existing Service or Policy?	Date of Assessment
Working at Height Policy	Estates and Facilities	Gary Hewit	Existing	September 2022
1) Who is responsible for this policy? Name of Division/Directorate: Estates and Facilities				
2) Describe the purpose of the service / function / policy / project/ strategy? Who is it intended to benefit? What are the intended outcomes? To prevent any person working at height injuring themselves or others				
3) Are there any associated objectives? Legislation, targets national expectation, standards: Compliance with legislation and Trust Policies and Procedures				
4) What factors contribute or detract from achieving intended outcomes? – Lack of adherence to Policies and Procedures				
5) Does the policy have an impact in terms of age, race, disability, gender, gender reassignment, sexual orientation, marriage/civil partnership, maternity/pregnancy, and religion/belief? Details: [see Equality Impact Assessment Guidance] - No				
<ul style="list-style-type: none"> • If yes, please describe current or planned activities to address the impact [e.g., Monitoring, consultation] – N/A 				
6) Is there any scope for new measures which would promote equality? [any actions to be taken] N/A				
7) Are any of the following groups adversely affected by the policy?				
Protected Characteristics	Affected?	Impact		
a) Age	No			
b) Disability	No			
c) Gender	No			
d) Gender Reassignment	No			
e) Marriage/Civil Partnership	No			
f) Maternity/Pregnancy	No			
g) Race	No			
h) Religion/Belief	No			
i) Sexual Orientation	No			
8) Provide the Equality Rating of the service / function / policy / project / strategy – tick (✓) outcome box				
Outcome 1 ✓	Outcome 2	Outcome 3	Outcome 4	
<i>*If you have rated the policy as having an outcome of 2, 3 or 4, it is necessary to carry out a detailed assessment and complete a Detailed Equality Analysis form – see CORP/EMP 27.</i>				
Date for next review: September 2025				
Checked by: James Hutchinson – Estates Manager			Date: November 2022	