



SAFETY ASSESSMENT  
FEDERATION

# Guidance

## Working at Height – Safe Access to Mobile Plant

Work at Height Regulations 2005

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## INTRODUCTION

Safety Assessment Federation (SAFed) member company Engineer Surveyors have been inspecting mobile plant for many years and the risk associated with a fall from height are well understood.

The purpose of this document is to describe a common SAFed position on gaining access to mobile plant for the purpose of inspection.

## DISCUSSION

### 1.1. Regulations

The Work at Height Regulations define a place to be “at height” if a person could be injured from falling from it, even if it is at or below ground level. The regulations require that:-

- The risks are assessed.
- The work is planned.
- The work is carried out by competent persons.
- The work equipment to be used has been inspected.
- The hierarchy of managing risk is adopted:-
- Avoid work at height
- Use measures to prevent falls
- Where they cannot eliminate the risk of a fall, use of work equipment or other measures to minimise the distance and consequences of a fall should one occur.
- Rescue is considered.

### 1.2. Work activity — Inspection

- The inspection of mobile plant carried out by Engineer Surveyors requires close visual scrutiny of critical components. The use of tools is not limited to measuring equipment as a degree of dismantling may be required to access critical hidden parts. The work is short in duration, typically less than 5 minutes in any one position. Applying the hierarchy of risk reduction it is apparent that in many situations:-
- Engineer Surveyors cannot avoid working at height.

- The installation of collective protection may not be practical or the installation creates a greater time on risk than does the inspection.
- The use of preventative measures is not always practicable, for example, the use of work restraint personal protective equipment is not always possible as there is no suitable anchor point. The use of inflatable mats and safety nets is not practical due the short nature of the task.

In these situations it may be sensible and pragmatic to adopt a minimum risk position and use the machine to gain access to the component for inspection.

### **1.3. Risk assessment**

A draft risk assessment is attached below. This could be customised to suit the particular hazards at the location of work.

### **1.4. Planning**

Planning should be carried out in consultation with the client responsible for the site. Agreement should include the access decisions, arrangements for monitoring and rescue. A minimum risk position must be adopted and appropriate safety foot wear worn.

### **1.5. Minimum risk position**

The machine must be isolated, in a position that is stable such that there is no risk of impact from other vehicles or unexpected movement of the machine. There must be a flat stable, weight-bearing place for feet and suitable handholds to gain access to carry out the inspection. The item must be free from slipping hazards such as oil or water. It must be possible for the Engineer Surveyor to maintain three points of contact at all times.

### **1.6. Competency**

All Engineer Surveyors employed by SAFed member companies are recruited against the strict requirements of the United Kingdom Accreditation Service (UKAS) schedules for the accreditation of inspection bodies, and in line with the mandatory aspects of the SAFed Standard SS01:2001. is this the current Standard?

All Engineer Surveyors undergo a rigorous and closely monitored training programme. Each Engineer Surveyor is authorised to undertake only the inspection work for which competency has been demonstrated. They all hold SAFed Safety Passports. or equivalent

Authorisation is maintained through regular routine field auditing of all Engineer Surveyors and through continuous technical development and training.

Accreditation to ISO /IEC 17020: 2012 and SAFed SS01 ensure that training and competency is maintained.

### 1.7. Example

Inspecting a lift truck and similar mobile plant, for example gaining access to the chains and masts. Where a step ladder or other access devices is suitable these may be used, however in the case of access to the fork truck masts for inspection the machine is typically used to access these parts. The use of access equipment requires over reaching with the potential to fall. Using the machine to gain access is considered to provide a less hazardous means of access by adopting a minimum risk position such as is achieved by standing on a lift truck mudguard, maintaining three points of contact.

Adopting these control measures provides a pragmatic approach to the hazards associated with work at height during the examination of mobile plant. There is still a risk of falling but we believe that the risk is 'As low as is reasonably practicable' (ALARP) commensurate with the benefit of completing the inspection / thorough examination which is designed to ensure that the machine does not contain defects that may cause a danger to persons.

**RISK ASSESSMENT – Work at height, gaining access to mobile work equipment**

Hazard	Who might be harmed	Control measure	What more needs to be done	By whom	When
<p>Work at height gaining access to carry out inspections</p> <p>Where it is not practical to use collective protection or preventative measures.</p>	<p>Engineer Surveyors may fall whilst gaining access to machines, potentially resulting in serious or fatal injury.</p>	<p>Engineer Surveyors are trained to make safe access decisions based upon the hierarchy of risk reduction</p> <ul style="list-style-type: none"> <li>• Avoid</li> <li>• Use collective protection</li> <li>• Use PPE.</li> <li>• The residual risk is controlled by:-</li> <li>• The machine must be isolated, in a stable position such that there is no risk of impact from other vehicles or unexpected movement of the machine.</li> <li>• Checking for any the weather conditions which may increase the risk of slipping.</li> <li>• Site Environmental considerations</li> <li>• Suitability of lighting</li> <li>• Underfoot conditions for oil etc.</li> <li>• Use of appropriate footwear</li> <li>• Other tripping hazards</li> <li>• Maintain three points of contact.</li> </ul>	<p>Engineer Surveyors are required to justify access decisions on the basis of the hierarchy of risk reduction and agree access decisions with site representatives.</p> <p>If Engineer Surveyors are concerned about any access of the examination they are authorised to stop the inspection.</p> <p>There is still a risk of falling but we believe that the risk is “As low as is reasonably practicable “ALARP commensurate with the benefit of completing the inspection which is designed to ensure that the machine does not contain defects that may cause a danger to persons.</p>	<p>Engineer Surveyors</p>	<p>Every access decision.</p>