UHSC 25/26 - 35

CODE OF PRACTICE

Work at Height

Document Information

Author	Paul Maggs, Health & Safety Advisor, Safety Health & Employee Wellbeing				
Revised By					
Date	June 2026	Version	2026	Status	Approved

Document change record

Date	Change description	Person
May 2026	First draft	Paul Maggs
June 2026	Summaries added in Appendices for training and competence requirements and inspection regime requirements. Language strengthen from should to must. Key message list added to the summary.	Paul Maggs
June 2026	Ladder training links changed to point to Moodle training course.	Paul Maggs

CONTENTS

1. Summary

Employers have a legal duty of care to assess, manage and control significant risks to their employees and others who might be affected by their undertaking. The University Health and Safety Policy sets out the general arrangements to fulfil this duty of care.

This Code of Practice (CoP) describes how the University Health and Safety Policy applies to activities involving work at height, and specific measures that must be taken to comply with the Policy and legal requirements. The Code of Practice is also intended to ensure that the University is managing our legal responsibilities to people working at height under the:

- The Health and Safety at Work Act 1974
- The Management of Health and Safety at Work Regulations 1999
- The Work at Height Regulations 2005
- The Provision and Use of Work Equipment Regulations 1998
- The Lifting Operations and Lifting Equipment Regulation 1998
- The Personal Protective Equipment Regulations 2022

The key messages of this Code of Practice are:

- ✓ That work at height must be avoided where possible.
- ✓ That collective fall prevention measures should be used in preference to person fall protection measures.
- ✓ That work at height equipment must be inspected before use.
- ✓ That work at height equipment must be formally inspected at suitable intervals.
- ✓ That defective equipment must never be used.
- ✓ That staff and students who work at height must be competent to do so and must be suitably supervised.
- ✓ That a rescue plan must be place where required.

2. Scope

This Code of Practice has been written to provide guidance and support for work at height activities performed by staff or students. This Code of Practice will be of particular interest to:

- Heads of Department, Divisions (School of management) and Professional Services Directorates who manage work at height activities that are performed by staff or students.
- Supervisory staff who supervise work at height activities that are carried out by staff or students.
- Staff or students who perform work at height activities.

This Code of Practice includes guidance for managers and supervisors on the general approach that must be taken to manage and supervise work at height activities, as well as guidance for specific scenarios and common work at height equipment that staff might use.

This Code of Practice is not applicable to contractors, although managers may consult this Code when evaluating risk assessments and method statements (RAMS) produced by contractors or when evaluating how they conduct their work at height. Those seeking guidance on managing contractors should consult the Management of Contractors Policy and the supporting documentation. Whilst this Code of Practice does not directly apply to contractors,

University managers must ensure contractor arrangements meet equivalent standards through the Management of Contractors Policy.

This Code of Practice is not applicable to recreational activities, such as rock climbing, bouldering, or abseiling.

3. Introduction

Falls from height are the single biggest cause of workplace fatalities, and a leading cause of life changing workplace injuries. Consequently, managing work at height activities is critical for safety, legal compliance and business protection.

The Work at Height Regulations 2005 set out the approach that employers must take to managing and performing work at height activities. The Regulations are designed to prevent falls and the resulting injuries. The regulations demand the application of a hierarchy of controls, with a preference to avoid work at height where possible, and were not, preventing falls.

The Regulations requires that the management of work at height is supported by risk assessment & planning, inspection & maintenance of equipment, training & supervision of employees, and (in some instances) emergency rescue planning.

4. Definitions

Working at Height	Work in any place where, if there were no precautions in place, a person could fall a distance liable to cause personal injury (for example a fall through a fragile roof, a fall from a ladder or a fall into an excavation). This is an extremely broad definition that includes a wide range of activities and a wide range of different equipment. Examples of work at height include: • Working on roofs, fragile surfaces, or near edges. • Working on scaffolds, mobile tower scaffolds, MEWPS, or elevated platforms. • Working on ladders or stepladders. • Working near openings (such as a lift shaft), pits, or excavations. Work at height does not include recreational activities. For example, recreational rock climbing would not be a work at height activity, but rock climbing to collect research samples would.

Hierarchy of Control	The Hierarchy of Control is a system used in health and safety to minimise or eliminate exposure to hazards. It ranks control measures from most effective to least effective. The hierarchy of control presented in this Code of Practice is specifically for work at height and comes from the Work at Height Regulations 2005. The controls must be applied in the order listed; avoidance of work at height, collective preventative measures, personal preventative measures, then fall mitigation.
Risk Assessment	A systematic process of identifying hazards, evaluating the risks associated with them, and implementing measures to eliminate or control those risks. For information on risk assessment, with links to risk assessment training, consult the Risk Assessment Guidance web page.
Competence	The combination of training, skills, experience and knowledge that a person has, and their ability to apply them to perform a task safely and effectively.
Scaffolds	A temporary structure used to provide safe access and a working platform for people and materials when working at height. A scaffold provides a safe working platform, with edge protection, toe boards and stability controls.
Mobile Tower Scaffold Also known as a Mobile Access Tower.	Mobile Tower Scaffolds are a subset of Scaffolds. They are assembled using prefabricated components, with the dimensions fixed by the design. They normally have four legs with castors and are stable by supports on the ground. A mobile tower scaffold is used to provide a safe, movable working platform, with edge protection, toe boards and stability controls.
Mobile Elevated Work Platforms (MEWP)	A machine designed to lift people, tools, and materials to a height safely, providing a temporary working platform that operators can move and reposition. A MEWP can be motorized to enable it to be repositioned, whilst others must be moved by hand. Examples of a MEWP are scissor lifts, boom lifts (also called cherry pickers), vertical mast lifts, and spider lifts.
Mobile Steps Also known as mobile safety steps, warehouse steps, mobile access stairs, or mobile podium steps.	Mobile steps are wheeled access units with built-in handrails and a working platform. They are widely used in warehouses, manufacturing, and retail environments.
Ladders	A piece of equipment consisting of two side rails joined by rungs or steps, used to provide access or egress between different working levels. Ladders are usually portable and are commonly used for short duration and low risk tasks.
Step Ladders	Step ladders are a subset of ladders. A step ladder is a self-supporting portable ladder with flat steps and a hinged design, allowing it to stand freely and used without needing additional support. Step ladders are usually portable and are commonly used for short duration and low risk tasks.

Kick Stools Also known as kick steps, roll feet, or elephant feet.	Kick Stools are small, mobile, spring-loaded step units. They are designed to lock in place under body weight, using spring loaded castors. Kick stools are widely used in offices, shops and libraries to access shelves.

5. Roles and Responsibilities

The University's health and safety policy describes the general roles and responsibilities of all employees to safeguard themselves and others in the workplace. This Code of Practice sets out the application of the University Health and Safety Policy to work at height.

5.1. Heads of Department / Directors of Professional Services

Heads of Department, Divisions (School of management) and Professional Services Directorates are responsible for the implementation of this Code of Practice for activities that they manage.

Heads of Department, Divisions (School of management) and Professional Services Directorates are responsible for:

- Ensuring that departmental arrangements are in place to implement this Code of Practice and legal requirements.
- Ensuring that departmental arrangements are in place so that work at height activities are properly risk assessed and planned, and that the hierarchy of control is applied.
- Ensuring that departmental arrangements are in place so that work at height equipment is subject to a suitable inspection and maintenance regime, and that suitable records are kept.
- Ensuring that departmental arrangements are in place so that staff and students who work at height are provided with suitable information, instruction, and training, and that staff and students who work at height are provided with suitable supervision.
- Ensuring that departmental arrangements are in place so that suitable emergency rescue plans are in place for work at height activities. The emergency rescue plans must be suitably risk assessed and planned, and sufficient resources are available to implement them.
- Ensuring that departmental arrangements are in place to provide assurance that the local arrangements, this Code of Practice, and legal requirements are complied with.

5.2. Staff Supervising Work at Height

Staff who directly supervise work at height activities are responsible for the operational implementation of this Code of Practice.

Staff who directly supervise work at height activities are responsible for

- Ensuring that work at height activities are properly risk assessed and planned, and that the hierarchy of control is applied.

- Ensuring that any work at height equipment has been subject to suitable inspection and maintenance. If equipment has not been subject to suitable inspection and maintenance, then the supervisor will ensure that it is not used.
- Ensuring that staff and students who work at height have been provided with suitable information, instruction, and training, and that staff and students who work at height are provided with suitable supervision. If staff and students have not been provided with suitable information, instruction and training, and providing supervision is not sufficient control, then the supervisor will not allow the work at height to proceed.
- Ensuring that staff suitable emergency rescue plans are in place for work at height activities. If the work requires an emergency rescue plan, and one is not in place, then the supervisor will not allow the work at height to proceed.

5.3. Staff Performing Work at Height

Staff who perform work at height activities are responsible for following this Code of Practice, local arrangements and any training given.

Staff who perform work are height are responsible for:

- Cooperating with their line managers and supervisors to ensure that health and safety responsibilities can be discharged. This includes reporting defective work at height equipment and reporting defective work at height practices so they can be remedied.
- Following this Code of Practice, departmental arrangements and any training given.
- Not misusing or damaging any work at height equipment provided.

Staff and students who perform work at height can refuse to undertake the work if doing so would breach this Code of Practice, departmental arrangements, or the training they have been given.

Students, except those performing paid employment, are not generally considered to be employees under health and safety legislation, and as such have few legal duties imposed. However, students are required to comply with University ordnances and regulations and are expected to comply with health and safety instructions.

6. Managing Work at Height

6.1. Managing Work at Height Hierarchy of Controls

Those who manage or supervise work at height activities must ensure that the hierarchy of controls is applied to the work. The work at height hierarchy of controls is a structured approach to controlling work at height risks which ranks work at height controls, from the most to the least effective. (See Appendix: Work at Height Hierarchy of Control Summary).

1	**AVOID**	Avoidance of work at height will eliminate all fall risks.
2	**COLLECTIVE PROTECTION**	Collective protection is equipment that does not require the person working at height to act to be effective. Examples are permanent or temporary guardrails, scissor lifts and tower scaffolds.
3	**PERSONAL PROTECTION**	Personal protection is equipment that requires the individual to act to be effective. An example is putting on a safety harness correctly and connecting it to a position restraint system
4	**FALL MITIGATION**	Mitigation measures do not prevent a fall from height but mitigates the effects of a fall. An example would be putting on a safety harness with an energy absorbing lanyard correctly and connecting it to a suitable anchor point. Mitigation measures must be used in conjunction with an emergency rescue plan

Application of the hierarchy of control will impact on the assessment and planning of the work at height.

The controls selected when applying the hierarchy will impact on the inspection & maintenance of equipment requirements, the training & supervision requirements, and the need (or otherwise) for emergency rescue planning.

Application of the hierarchy of controls does not prevent the use of ladders, step ladders, or kick stools. However, these are at the bottom of the hierarchy and must only be used in low-risk situations and for short periods of time. Consult the Specific Work at Height Situations & Equipment section of this Code of Practice for more details.

6.2. Managing Work at Height Supporting Measures

Application of the hierarchy of controls must be supported by other measures. The supporting measures are:

- Risk assessment & planning of work at height.
- Inspection & maintenance of equipment.
- Training & supervision of workers.
- Emergency rescue planning.

The purpose of the supporting measures is to ensure that the hierarchy is properly applied, and the controls fully implemented.

All work at height activities must be subject to risk assessment and the work must be planned to ensure that the risk assessment is fully implemented before the work starts. Work at height risk assessment should be recorded on the standard risk assessment template used at the university.

Hazards that work at height risk assessment will likely need to consider are:

- Falls from height.
- Falling objects striking persons below.
- Fragile surfaces at height (such as fragile roofs or skylights).
- Unstable or improperly erected access equipment or equipment failure.
- Weather conditions (such as wind, rain or ice).
- Overreaching or loss of balance.
- Access and egress arrangements.

A completed work at height risk assessment must identify the appropriate equipment to be used and the competencies needed by the equipment operators. For details on the competencies needed in different situations consult the Specific Work at Height Situations & Equipment section of this Code of Practice.

For information on risk assessment, with links to risk assessment training, and the risk assessment template, consult the Risk Assessment Guidance web page.

All work at height equipment will require periodic inspection, and some work at height equipment will require maintenance. For details on the regimes for different work at height equipment consult the Specific Work at Height Situations & Equipment section of this Code of Practice for more details.

For details on the competencies needed in different situations consult the Specific Work at Height Situations & Equipment section of this Code of Practice. The level of competency needed will vary from the completion and passing of training courses to use specific equipment (for example mobile tower scaffolds or MEWP), to the receiving of instruction.

Some work at height will require an emergency rescue plan.

A rescue plan is required where a MEWP is used for work at height. The rescue plan must include the action to take in the event of a MEWP failure which strands the operators at height. The MEWP manual should contain instructions on how to lower a MEWP in the event of a failure.

A rescue plan is required where safety nets, air bags or fall arrest systems are used as a work at height control measure. However, it would be expected that such work would normally be carried out by specialist contractors (and not staff or students), and that the contractors risk assessments and method statements (RAMS) would include rescue planning.

7. Specific Work at Height Situations & Equipment

7.1. Working on a Roof

Building roofs are part of the building fabric and are the responsibility of Campus Infrastructure. Roof access is controlled by Campus Infrastructure, and access to a roof requires their express permission.

Permission will be given in the form of a Roof Access Permit, issued by an authorised member of Campus Infrastructure acting on behalf of the Director of Campus Infrastructure.

A request for a Roof Access Permit must be supported by documented risk assessments and method statements (RAMS), including emergency and rescue arrangements. Some roofs may house more hazards than simply working at height, such as equipment and local exhaust ventilation outlets, which will need to be considered in the RAMS.

For more information contact Campus Infrastructure or consult the Campus Infrastructure Code of Safe Working Practices for Contractors.

Some roofs are equipped with edge guarding, making them relatively safe places to work. However, edge guarding is not universal. Contact Campus Infrastructure for information on specific roofs and the arrangements that are in situ.

7.2. Scaffolding

Scaffolds are widely used for construction, maintenance, and inspection tasks. When used correctly they provide a stable and guarded work platform with safe access and egress.

Scaffolding must be planned, erected, altered, dismantled and inspected by competent persons only. These roles are all the reserve of specialist contractors. For more information contact Campus Infrastructure or consult the Campus Infrastructure Code of Safe Working Practices for Contractors

A scaffolding contractor must be a member of a recognised trade body, such as the National Access and Scaffolding Confederation (NASC)[1]. The contractor staff who erect the scaffold must hold a Construction Industry Scaffolders Record Scheme card (CISR)[2]. The contractors' supervisory roles must hold a CISR card, and a Site Supervisor Safety Training Scheme or Site Management Safety Training Scheme qualification.

A scaffold must be inspected by a competent person:

- Before first use.
- Every seven days.
- After alterations.
- After bad weather (such as high winds or storms).
- After an impact or other damage.

Ensure that if a scaffold fails an inspection, that it is clearly marked as having failed and that it is not used until faults are rectified and the inspection repeated.

[1] The National Access and Scaffolding Confederation (NASC) is the main UK trade body for the scaffolding and access industry. It is recognised as the leading authority in the sector.
[2] The Construction Industry Scaffolders Record Scheme (CISRS) is the UK's official training and competence certification scheme for individual scaffolders. The scheme is used across the UK to prove that a scaffolder and supervisors are trained and competent.

Some Departments have scaffold structures to create temporary observation platforms. Although this is not the traditional use of a scaffold, they must still be subject to inspection as listed above. A staff member or contractor with a CISRS Scaffold Inspection card would be competent to do this. Records must be kept of each inspection.

7.3. Mobile Tower Scaffolding

Mobile Tower Scaffolds are widely used for construction, maintenance, and inspection tasks. When used correctly they provide a stable and guarded work platform with safe access and egress.

Mobile Tower Scaffolds are a subset of scaffolds. They are assembled using prefabricated components, with the dimensions fixed by the design. They normally have four legs with castors and are stable by supports on the ground. Because the tower is prefabricated and the design is fixed, the level of training needed to be competent to erect, dismantle or inspect a tower is less than that of a scaffolder.

Describing all the intricacies of using a mobile tower scaffold is beyond the scope of this Code of Practice. Further information on the safe use of tower scaffolds can be found in the PASMA Operators Code of Practice (which is available on request through the PASMA website).

Towers must only be assembled, dismantled or passed for use by people who are competent to do so. People who have passed the appropriate Prefabricated Access Suppliers' & Manufacturers' Association (PASMA)[3] approved training courses are widely recognised as competent to assemble, dismantle or inspect a tower scaffold.

Additional PASMA training will be required for some tasks involving towers (e.g. assembling a tower scaffold on stairs). Additional PASMA training is needed for anything other than a simple BS EN 1004-1 mobile access tower. There is a range of BS 1139-6 tower configurations available, with a corresponding PASMA course.

An instruction manual should be supplied with a mobile scaffold tower when purchased or hired. The instruction manual will contain essential health and safety information and must be readily available to those who assemble or dismantle the tower.

If the operation has been properly assessed, planned and organised then the tasks will we carried out by competent PASMA trained operatives, however the exact arrangements differ between towers, and it is essential that they have access to the manual.

The manual should report:

- ✓ How to assemble the tower without ever standing on an unprotected platform.
- ✓ The bracing pattern, which is what gives the tower its strength.
- ✓ Which stabilisers or outriggers to use for the height of the tower you're building.
- ✓ Guidance on maximum allowable side loads, such as the wind or use of high-pressure jets.
- ✓ The maximum safe working load that a single platform and the whole tower can support.
- ✓ A schedule of the components and their number required for each configuration.

[3] The Prefabricated Access Suppliers' & Manufacturers' Association (PASMA) is an international not for profit association who represent the interest of manufacturers, suppliers, specifiers, and users of prefabricated access equipment (including mobile tower scaffolds). It provides and oversees the industry standard training scheme and is a major publisher of safety-related knowledge, information, and guidance. Persons who have passed the appropriate PASMA approved training courses are widely recognised as competent to assemble, dismantle or inspect a tower scaffold

Tower scaffolds must comply with the standard required for all types of scaffolds, e.g. double guardrails, toeboards, bracing and access ladder.

If purchasing or hiring a mobile tower scaffold, the equipment must be compliant with EN 1004[4]. A tower that meets the relevant standards must:

- ✓ Be marked with a label that confirms it meets the standard.
- ✓ Come with certification that confirms it meets the standards.
- ✓ Have purpose designed platforms and trapdoor entry and exit.
- ✓ Built in access for safe ascent and descent.
- ✓ Supplied with the correct size and quantity of stabilisers to prevent overturning.
- ✓ Have the correct quantity and number of guardrails with the correct gaps and dimensions to prevent a fall.

For more information on buying or renting a mobile tower scaffold consult the PASMA website.

When selecting a tower, you'll also need to select the most appropriate configuration. Towers come in different shapes and sizes, with different access arrangements. When you're choosing a tower, pay close attention to a few key attributes to ensure it meets your needs. These details should be marked on the tower, the user instructions or on the supplier's website.

Different towers can have different built in access arrangements. The options are stairways, stair-ladders, inclined ladders or vertical ladders. Task that requires users to frequently go up and down the tower should use a tower with a stairway or stair ladder. Task that requires users to carry materials or larger tools or equipment should use a stairway tower.

Different towers have different safe working loads. Manufacturers will usually quote the safe working load (SWL) of a tower, but some will quote this as the universally distributed load (UDL) or maximum distributed load (MDL). When selecting a tower, ensure that the SWL is sufficient for the people, tools and equipment that will be on the structure at any one time.

Different towers have different maximum platform heights that it can be built to. The tallest possible height that an EN 1004-1 tower can go to is 8 metres outdoors and 12 metres indoors. When selecting a tower, ensure that the maximum height is sufficient for the task.

When left in an incomplete state, a notice must be placed on the tower in a prominent position to announce the fact. A PASMA tower inspection record or a Scafftag inspection record would be a suitable notice.

Ensure that the tower scaffold is subject to an inspection regime carried out by a competent person. Inspections must be carried out as follows.

- ✓ After assembly and before first use.
- ✓ After modification and before use.
- ✓ At an interval of no more than seven days and
- ✓ After any circumstances liable to compromise the installation

The inspection must be carried out by a competent person, and should include checks that:

[4] EN 1004 is a European standard that specifies safety requirements for mobile access and working towers (MAWPs) — commonly known as mobile scaffold towers.

- ✓ The tower has been erected properly, following the manufacturers manual, and properly braced.
- ✓ The ground is firm, level, stable and capable of supporting the tower.
- ✓ That no improvised packing has been used to level the tower (such as bricks or blocks).
- ✓ The correct outriggers or stabilisers are fitted where required, and that castors are locked.
- ✓ The tower is fitted with toeboards, bracing and access ladders, and these are installed properly.

You do not need to re-inspect the tower if it is moved unless it was necessary to significantly alter it to make that movement or if anything happens when moving it that may have affected its safety.

Ensure that if a tower scaffold fails an inspection, that it is clearly marked as having failed and that it is not used until faults are rectified and the inspection repeated.

Ensure that a record of the inspection is made and retained until superseded by the next inspection. Ensure that the inspection record is displayed on the completed tower scaffold. Commercial systems are available for recording and displaying the inspection results e.g. Using Scafftag or PASMA tags.

Ensure that tower scaffolds are assembled or dismantled only by persons competent to undertake this work. Towers must be erected following a safe method of work, either using:

- ✓ Advance guard rail system – where temporary guard rail units are locked in place from the level below and moved up to the platform level. They are in place before the operator accesses the platform to fit the permanent guard rails.
- ✓ 'Through-the-trap' (3T) – involves the operator taking up a working position in the trap door of the platform, from where they can add or remove the components which act as the guard rails on the level above the platform. It is designed to ensure that the operator does not stand on an unguarded platform.

To maintain tower stability, you must make sure:

- ✓ the tower is resting on firm, level ground with the locked castors or base plates properly supported. Never use bricks or building blocks to take the weight of any part of the tower.
- ✓ stabilisers or outriggers are installed when required by the instruction manual; and
- ✓ that a tower is never erected to a height above that recommended by the manufacturer.

When moving a tower, you must always:

- ✓ reduce the height to a maximum of 4m.
- ✓ check that there are no power lines or other obstructions overhead.
- ✓ check that the ground is firm, level and free from potholes; and
- ✓ push or pull using manual effort from the base only.

Never move a tower while people or materials are on the tower, or in windy conditions.

7.4. Mobile Elevated Work Platforms

Describing all the intricacies of using a Mobile Elevated Work Platforms is beyond the scope of this Code of Practice. There are numerous different types of MEWP, and differences in operation for similar types. It is recommended that the manufacturers or suppliers handbook is consulted. Some guidance can also be found on the International Powered Access Federation (IPAF) web site.

Mobile Elevated Work Platforms (MEWP)are commonly used for site inspections, maintenance tasks, high level cleaning tasks, and tree surgery work. If used properly, they provide a safe working platform with edge guarding and safe access and egress. Mobile Elevated Work Platforms can come in a number of different formats. Examples include scissor lifts, boom lifts (also called cherry pickers), vertical mast lifts, and spider lifts.

MEWPS must only be moved and operated by people who are competent to do so. People who have passed the appropriate International Powered Access Federation (IPAF) approved training courses are widely recognised as competent to use a MEWP.

There are different IPAF courses for different types of MEWP, and the IPAF course must match the type of MEWP to be used. There may be differences between the MEWP on which the user has trained, and the MEWP to be used, such that the user may need familiarisation training, or additional time to become familiar with the controls.

A Mobile Elevated Work Platform must be inspected by the users before every use or following maintenance. Visual checks should be made of the wheels, the structure, the hydraulic system, the power system, the working platform, the stabilisers, and the harness anchor points. There are numerous different types of MEWP, and differences in operation for similar types. It is recommended that the manufacturers or suppliers handbook is consulted.

A Mobile Elevated Work Platform functions must be tested by the user before every use or following maintenance. Checks should be made of the stabilisers, the emergency stop controls, the emergency lowering system, the control system, the movement functions, the alarm system, and the limit switches. There are numerous different types of MEWP, and differences in operation for similar types. It is recommended that the manufacturers or suppliers handbook is consulted.

A logbook must be kept of visual checks and function checks.

If a defect is found, then the MEWP must not be used. It must be clearly marked as defective, and it must be withdrawn from service until it can be repaired.

A Mobile Elevated Work Platforms must be formally inspected by a competent engineer every six months (as required by the Lifting Operations and Lifting Equipment Regulation 1998)[5]. The engineer will complete a formal thorough examination and will issue a thorough examination certificate if the inspection is passed[6]. The thorough examination provides assurance that the MEWP is safe to use, has no defects affecting safety, and complies with legal requirements.

7.5. Mobile Safety Steps

Mobile steps (also called mobile safety steps, warehouse steps, mobile access stairs, or mobile podium steps) are wheeled access units with built-in handrails and a working platform. They are widely used in warehouses, manufacturing, and retail environments.

[5] Under the Lifting Operations and Lifting Equipment Regulations 1998, a MEWP is classified as lifting equipment, and because they lift people, they must undergo a formal though examination every six months.

[6] It is a statutory requirement that insurance surveyors inspect all University-owned pressure vessels and lifting equipment at regular intervals. A schedule of all equipment inspected, and the certificates of inspection are held and maintained by Property Services. All such equipment should be declared to Simon Holt, Insurance Services Manager, before it is used, so that it can be added to the insurance schedules. Visit Insurance Services.

Mobile steps provide:

- ✓ A stable working position.
- ✓ Guardrails and platform protection.
- ✓ Safer access than ladders for light–medium tasks requiring two hands.
- ✓ Controlled movement when *not occupied.*

Mobile steps offer partial collective protection (guardrails, stable platform) but still rely on operator positioning and correct use. Therefore, they are typically ranked above ladders but below fully guarded tower platforms

Mobile steps are appropriate when:

- ✓ The task is short to moderate duration.
- ✓ Workers need a stable platform with guardrails.
- ✓ Loads are light and manageable (manufacturer guidance discourages heavy tools and load-carrying).
- ✓ Ground conditions are level and firm.

If the work requires extended duration, heavy tools, outreach, or significant movement, a scaffold tower or MEWP may be more appropriate.

Mobile steps must not be used when:

- × Work requires leaning or reaching outside the guardrails.
- × The platform height is insufficient.
- × Heavy equipment or materials must be lifted or used.
- × The floor surface is uneven or contaminated.
- × Long-duration tasks requiring hands-free operation.

In these cases, choose a scaffold tower, podium, or MEWP depending on risk.

Operators must receive suitable and sufficient information and instruction on the safe use of mobile steps or must be supervised by a competent person. This must include:

- ✓ Work at height hazards.
- ✓ Safe ascent and descent.
- ✓ Use of platform handrails.
- ✓ Proper braking procedure.

If purchasing or hiring mobile steps, the equipment must be compliant with EN 131-7: Mobile Ladders with Platform. (EN 131-7 is the European (and British) standard that defines the design, safety, marking, and testing requirements for *mobile steps / mobile ladders with a platform)*. Very few UK manufacturers certify to EN 131-7 due to high testing costs.

Mobile steps must be:

- ✓ Used with brakes fully applied, immobilising the unit.
- ✓ Used by only one person at a time (usually an explicit manufacturer requirement).
- ✓ Worked from while staying within the handrails, with users remaining central and within arm's reach of the task.
- ✓ Kept clear of surrounding hazards, barriers or signage are recommended to prevent collision if other people are nearby.

- ✓ Never moved with a person or load onboard.
- ✓ Moved only on level ground as movement over uneven surfaces risks instability and tip-over.

Mobile steps must be inspected by the operator before use. The inspection should include a check of:

- ✓ Presence and condition of rubber feet
- ✓ Working brake system (must be applied before use)
- ✓ Stability of the top platform
- ✓ Condition of handrails

Departments must ensure that their mobile safety steps are formally inspected annually. A record must be made of each inspection, and an inspection record retained until superseded by the next inspection.

7.6. Ladders and Step Ladders

Describing all the intricacies of using a ladder or step ladder is beyond the scope of this Code of Practice. Further information on the safe use of ladders and step ladders can be found in LA455 Safe Use of Ladders and Stepladders – a Brief Guide. This guidance is published by the Ladder Association[7] in conjunction with the Health and Safety Executive and replaces the HSE guidance.

You may use a ladder when your risk assessment shows that:

- ✓ A higher level of fall protection (e.g. scaffold, MEWP) is not justified due to low risk or short duration.
- ✓ The work requires being in one position no longer than ~30 minutes.
- ✓ The workplace circumstances (e.g. tight space, short maintenance task) make other equipment impractical.

Operators must receive suitable and sufficient information and instruction on the safe use of ladders or stepladders or must be supervised by a competent person. This should include:

- ✓ Assessing risks.
- ✓ When/when not to use a ladder.
- ✓ Choosing the correct ladder type.
- ✓ Using ladders correctly.

An online training course is available for ladder and step ladder users on Moodle . For most ladder users watching and understanding the video guidance should be sufficient. For higher risk ladder operations, or operations that deviate from the norm, then the Ladder Association training course and assessment should be considered.

[7] The Ladder Association is the key UK organisation for safe ladder use and competence—similar to how IPAF relates to MEWPs and NASC/CISRS to scaffolding. The Ladder Association sets best practice for safe ladder use in the UK.

If purchasing or hiring a ladder or step ladder, the equipment must be compliant with EN131. This is the European harmonised safety standard for portable ladders, covering all types such as step ladders, extension ladders and combination ladders. The standard contains two classifications; EN 131 professional (intended for more demanding workplace use) and EN 131 non-professional (intended for light domestic use). Ladders purchased or hired for work use must be compliant with EN 131 professional.

While BS2037 and BS1129 have been withdrawn, ladders originally made to these standards prior to their withdrawal, and which are still in good condition, may still be used (subject to following user instructions and guidance on safe use).

Ladders and stepladders must be inspected by the operator before use. The inspection should be done at the start of a work session, or after any significant change (e.g. moving the ladder from a dirty to clean area. The inspection should include a check of:

- ✓ Stiles are not bent, cracked, or damaged (as the ladder could collapse under load).
- ✓ Feet are present, undamaged, clean, and not worn.
- ✓ Rungs or steps are not loose, missing, or contaminated.
- ✓ Locks & hinges (on stepladders) are working correctly.
- ✓ General condition after the ladder has been dropped or moved.

A ladder or step ladder must not be used if it fails any of the checks and it must be withdrawn from service. Other than unclean feet or rungs (which can be cleaned), ladder and stepladder faults can not be remedied, and the ladder will need to be safely disposed of.

Departments must ensure that their ladders and stepladders are formally inspected annually. A record must be made of each inspection, and an inspection record retained until superseded by the next inspection. The Ladder Association training course for ladder inspection should be considered. It is common practice to attach a scafftag to the ladder as a means to record and display the inspection results.

7.7. Kick Stools

Kick Stools (also known as kick steps, roll feet or elephant feet) are small, mobile, spring-loaded step units. They are designed to lock in place under body weight, using spring loaded castors. Kick stools are not classed as a ladder; however, they are work at height equipment. They sit at the very bottom of the control hierarchy, and they are only appropriate for very low risk, low height, short duration tasks.

They are commonly used in offices, libraries, retail premises, and stock rooms, typically for reaching shelves that are just out of normal reach.

Kick stools are suitable for very low-level work only. They can be used when:

- ✓ The required reach is small
- ✓ The task is low risk and short duration
- ✓ The loads are light (as heavy or bulky loads can cause a loss of balance)
- ✓ The task does not require side-loading, leaning, or stretching

If the user needs to reach significantly higher or handle larger loads, then mobile steps or a step ladder must be used instead.

Operators must receive suitable and sufficient information and instruction on the safe use of kick stools. Use of a kick stool is relatively straightforward, and the instruction needed is minimal.

If purchasing a kick stool, the equipment must be compliant with EN 14183, the European Standard that specifies requirements, dimensions, materials, performance criteria, and test methods for step stools, including stair-type and dome-type step stools. The standard includes fixed or folding step stools, stair-type step stools and dome-type steps (e.g. kick stools).

Kick stools must be inspected by the operator before use. Before using a kick stool, it should be checked to ensure that:

- ✓ The base castors are free from damage (as these are essential for grip and stability).
- ✓ The base is free from cracks, buckling or other structural damage.
- ✓ That the stool platform is clean, dry and intact.

Departments must ensure that their kick stools are formally inspected annually. A record must be made of each inspection, and an inspection record retained until superseded by the next inspection.

When using a kick stool user must:

- ✓ Step on one foot at a time, keeping both feet centred on the stool platform
- ✓ Maintain an upright posture and do not overreach
- ✓ Handle only small, light items as large loads can increase instability
- ✓ Dismount slowly, one foot at a time, and do not jump off
- ✓ Wear closed toe footwear with good grip
- ✓ Keep the operating area clear of obstacles
- ✓ Avoid using kick stool near moving doors, congested aisles
- ✓ Only use the kick stool on flat dry surfaces.

8. Appendix: Work at Height Hierarchy of Control Summary

Key Principles

Always plan and organise work at height properly
Use competent people and suitable equipment
Apply the hierarchy top-down — don't skip steps
Prioritise collective protection over personal protection

Control: Avoid work at height altogether (elimination).

This is the best control as it eliminates the risk entirely
Examples: Using extendable tools such as long handled rollers, long handled window cleaning poles.
Examples: Prefabricating components at ground level to eliminate some work at height.

Control: Prevent falls using collective protection measures.

Collective measures protect everyone, with no user action required. Preferred over personal protection.
Examples: Guardrails, handrails and toe boards.
Examples: Scaffolding with edge protection.
Examples: Mobile elevated work platforms with guard rails.

Control: Prevent falls using personal protective measures.

Personal measure protects the person using it only, and which requires action by the user to activate.
Requires suitable training and correct use.
Examples: Restraint systems such as work positioning and shirt lanyards.
Examples: Personal fall protection systems that prevent reaching a fall edge.

Control: Minimises the consequences of a fall (mitigation).

These measures do not prevent a fall, they only reduce the harmful consequences of a fall.
These measures are a last resort as they do not prevent falls and only reduce the injury suffered.
Requires suitable training and correct use.
Requires emergency rescue plans that can be implemented rapidly (eg to retrieve someone who has fallen)
Examples: Fall arrest systems (harness and a lanyard with shock absorbers)
Examples: Safety nets, air bags, and soft-landing systems.

Supporting Measures.

Application of the hierarchy of control should be supported by:
Risk assessment and planning of work at height
Inspection and maintenance of equipment
Training and supervision of workers
Emergency rescue planning

9. Appendix: Training & Competence Summary Table

Equipment	Minimum Requirement
Scaffolding	A scaffolding contractor must be a member of a recognised trade body, such as the National Access and Scaffolding Confederation (NASC). The contractor staff who erect the scaffold must hold a Construction Industry Scaffolders Record Scheme card (CISR). The contractors' supervisory roles must hold a CISR card, and a Site Supervisor Safety Training Scheme or Site Management Safety Training Scheme qualification. Some Departments have scaffold structures to create temporary observation platforms. A staff member or contractor with a CISRS Scaffold Inspection card would be competent to carry out weekly inspections.
Mobile Tower Scaffolding	Towers must only be assembled, dismantled or passed for use by people who are competent to do so. People who have passed the appropriate Prefabricated Access Suppliers' & Manufacturers' Association (PASMA) approved training courses are widely recognised as competent to assemble, dismantle or inspect a tower scaffold
Mobile Elevated Work Platform	MEWPS must only be moved and operated by people who are competent to do so. People who have passed the appropriate International Powered Access Federation (IPAF) approved training courses are widely recognised as competent to use a MEWP. There are different IPAF courses for different types of MEWP, and the IPAF course must match the type of MEWP to be used. There may be differences between the MEWP on which the user has trained, and the MEWP to be used, such that the user may need familiarisation training, or additional time to become familiar with the controls.
Mobile Safety Steps	Operators must receive suitable and sufficient information and instruction on the safe use of mobile steps or must be supervised by a competent person.
Ladders and Step Ladders	An online training course is available for ladder and step ladder users on Moodle . For most ladder users watching and understanding the video guidance should be sufficient. For higher risk ladder operations, or operations that deviate from the norm, then the Ladder Association training course and assessment should be considered.
Kick Stools	Operators must receive suitable and sufficient information and instruction on the safe use of kick stools. Use of a kick stool is relatively straightforward, and the instruction needed is minimal.

10. Appendix: Inspection Regime Summary Table

Equipment	Pre-Use	Formal Inspection
Scaffolding	When left in an incomplete state, a notice must be placed on the scaffolding a prominent position to announce the fact. A Scafftag inspection record would be a suitable notice	Ensure that the scaffold is subject to an inspection regime carried out by a competent person. Inspections must be carried out at an interval of no more than seven days.
Mobile Tower Scaffolding	When left in an incomplete state, a notice must be placed on the tower in a prominent position to announce the fact. A PASMA tower inspection record or a Scafftag inspection record would be a suitable notice	Ensure that the tower scaffold is subject to an inspection regime carried out by a competent person. Inspections must be carried out at an interval of no more than seven days
Mobile Elevated Work Platform	A Mobile Elevated Work Platform must be inspected by the users before every use or following maintenance. A Mobile Elevated Work Platform functions must be tested by the user before every use or following maintenance. A logbook must be kept of visual checks and function checks.	A Mobile Elevated Work Platforms must be formally inspected by a competent engineer every six months (as required by the Lifting Operations and Lifting Equipment Regulation 1998)[8]. The engineer will complete a formal thorough examination and will issue a thorough examination certificate if the inspection is passed
Mobile Safety Steps	Mobile steps must be inspected by the operator before use	Departments must ensure that their mobile safety steps are formally inspected annually. A record must be made of each inspection, and an inspection record retained until superseded by the next inspection
Ladders and Step Ladders	Ladders and stepladders must be inspected by the operator before use. The inspection must be done at the start of a work session, or after any significant change (e.g. moving the ladder from a dirty to clean area.	Departments must ensure that their ladders and stepladders are formally inspected annually. A record must be made of each inspection, and an inspection record retained until superseded by the next inspection. The Ladder Association training course for ladder inspection should be considered.
Kick Stools	Kick stools must be inspected by the operator before use	Departments must ensure that their kick stools are formally inspected annually. A record must be made of each inspection, and an inspection record retained until superseded by the next inspection.

[8] Under the Lifting Operations and Lifting Equipment Regulations 1998, a MEWP is classified as lifting equipment, and because they lift people, they must undergo a formal though examination every six months.