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Author / Title: Nicola Chelton – Health and Safety Advisor		Responsibility: Health and Safety	
Replaces: Version 3, Work at Height, S126		Head of Department: Anna Smith Head of Health and Safety	
Validated By: Health and Safety Committee		Date: 20/07/2017	
Ratified By: Procedural Document and Information Leaflet Group		Date: 16/08/2017	
Review dates may alter if any significant changes are made		Review Date: 01/08/2020	
Which Principles of the NHS Constitution Apply? Please list from principles 1-7 which apply Principles		Which Staff Pledges of the NHS Constitution Apply? Please list from staff pledges 1-7 which apply Staff Pledges	
Does this document meet the requirements of the Equality Act 2010 in relation to Race, Religion and Belief, Age, Disability, Gender, Sexual Orientation, Gender Identity, Pregnancy & Maternity, Marriage and Civil Partnership, Carers, Human Rights and Social Economic Deprivation discrimination? *Yes / No * Please delete as required			
Document for Public Display: *Yes / No * Please delete as required			
Reference Check Completed by..... Joanne Phizacklea..... Date..... 01/05/2017.....			
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CONTENTS		
		Page
1	SUMMARY	3
2	PURPOSE	3
3	SCOPE	3
3.1	Duties	3
4	POLICY	4
4.1	Organising and Planning	4
4.2	Risk Assessment	5
4.3	Information Instruction, Training and Competency	5
4.4	Roof Access	6
4.5	Selection of work equipment	6
4.6	Fragile Work Surfaces	7
4.7	Falling objects	8
4.8	Danger Area	8
4.9	Inspection of Work Equipment	8
4.10	Inspection of places of work at height	9
4.11	Emergency Procedures	9
4.12	Statutory Duties	9
5	ATTACHMENTS	9
6	OTHER RELEVANT / ASSOCIATED DOCUMENTS	10
7	SUPPORTING REFERENCES / EVIDENCE BASED DOCUMENTS	10
8	DEFINITIONS / GLOSSARY OF TERMS	10
9	CONSULTATION WITH STAFF AND PATIENTS	11
10	DISTRIBUTION PLAN	11
11	TRAINING	11
12	AMENDMENT HISTORY	11
Appendix 1	Work at Height Flow Chart	12
Appendix 2	Visual Inspection Checklist	13
Appendix 3	Equality & Diversity Impact Assessment Tool	14

University Hospitals of Morecambe Bay NHS Foundation Trust		ID No. Corp/Pol/131
Version No: 4	Next Review Date: 01/08/2020	Title: Work at Height
<i>Do you have the up to date version? See the intranet for the latest version</i>		

1. SUMMARY

There is a potential for injuries whilst working at height. The injuries sustained could be fatal if the correct control measures and procedures are not in place.

Work at height means 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 you are working at height if you:

- are working on a ladder or a flat roof
- are working off a step stool or “hop-up”
- could fall through a fragile surface
- could fall into an opening in a floor or a hole in the ground

2. PURPOSE

The purpose of this policy is to outline how that risk will be managed to ensure the safety of all who undertake working at height.

- The purpose of this policy is to ensure that the Trust as duty holders will:
- Avoid work at height where they can;
- Where the Trust cannot avoid working at height, use work equipment or other measure to prevent falls; and
- Where the Trust cannot eliminate the risk of a fall, use work equipment or other measures to minimise the distance and consequences of a fall should one occur.

3. SCOPE

3.1 Duties

Chief Executive

Responsible for ensuring that the Trust complies with current health and safety legislation and industry good practice.

Director of Governance

Responsible for ensuring the implementation of all Health and Safety legislation, policies and procedures relating to working at height.

Divisional Management Team

Responsible for ensuring that all approved policies, current health and safety legislation and industry good practice are implemented and followed within their area of responsibility with respect to working at height.

Departmental Managers of staff working at height

Responsible for ensuring that all approved policies, current health and safety legislation and industry good practice are in place and implemented in their areas of responsibility.

Responsible for ensuring that all necessary registers are kept and monitored on a regular basis.

University Hospitals of Morecambe Bay NHS Foundation Trust		ID No. Corp/Pol/131
Version No: 4	Next Review Date: 01/08/2020	Title: Work at Height
<i>Do you have the up to date version? See the intranet for the latest version</i>		

Responsible for ensuring that method statements or procedures are in place.

Ensure any relevant permit for working at height is issued to staff provided the supporting documentation has been supplied.

Ensure local site policy is followed for access to the roof.

Responsible for ensuring that all training is provided as necessary.

Monitoring a 3% sample of working at height events to ensure compliance with all requirements.

Appointing Officers of Contractors working at height

Responsible for ensuring that contractors are managed in accordance with the Control of Contractors policy.

Responsible for ensuring local access procedures are communicated to the contractor and all permits to work are issued appropriately.

Randomly checking 3% of work at height events to ensure compliance with work at height requirements in their areas of authority. (This will not apply where sites are “handed over” to the contractor).

Health & Safety Department

Responsible for auditing against the work at height policy and departmental local systems and procedures.

Health and Safety Committee

Responsible for approving policy and any future amendments to it.

All Employees

Ensure that they use equipment that is provided in accordance with the training and instruction provided.

Ensure that they only carry out work that they are trained to do.

Every employee has a duty to report any risk relating to work at height likely to endanger the safety of anyone.

Report any unsafe working practices.

4. POLICY

4.1 Organising and Planning

All work at height will be properly planned, appropriately supervised, and carried out in as safe a way as is reasonably practicable.

Types of work carried out may be; accessing and retrieving items, cleaning and maintenance, inspection, refurbishment and re-roofing and ancillary works etc.

Emergency and rescue procedures must be in place for all work at height.

University Hospitals of Morecambe Bay NHS Foundation Trust		ID No. Corp/Pol/131
Version No: 4	Next Review Date: 01/08/2020	Title: Work at Height
<i>Do you have the up to date version? See the intranet for the latest version</i>		

Before working at height work planning involves these basic steps:

- Avoiding work at height where it is reasonably practicable. This means balancing the level of risk against the measures needed to control the real risk in terms of money, time or trouble. If it would be grossly disproportionate to the level of risk to do so this means that work at height cannot easily be avoided so;
- Preventing falls using either an existing place of work that is already safe or the right type of equipment and also
- Minimising the distance and consequences of a fall, by using the right type of equipment where the risk cannot be eliminated.

For each step, the primary consideration should be to measures that protect everyone at risk (collective protection) before measures that only protect the individual (personal protection).

Collective protection means using equipment that does not require the person working at height to act for it to be effective. Examples are permanent or temporary guardrails, scissor lifts and tower scaffolds.

Personal protection is equipment that requires the individual to act for it to be effective. An example is putting on a safety harness correctly and connecting it, with an energy-absorbing lanyard, to a suitable anchor point.

Weather conditions must be taken into account so that the safe working of persons involved is not jeopardised and work at height must not be carried out in hazardous weather conditions unless as part of a properly planned emergency procedure.

4.2 Risk Assessment

Under Regulation 3 of the Management of Health and Safety at Work Regulations 1999¹, a risk assessment must be carried out before any work can be undertaken.

The first principle is to avoid work at height therefore it must be decided if work at height is necessary and whether it can be avoided.

All risk assessments will be developed, monitored and reviewed in line with the Risk Assessment Policy. Generic risk assessments for working at height will be developed where this is a regular activity and job specific risk assessments for work at height will reflect the particular requirements of the job in hand.

As a rule only Estates staff will be required to use stepladders over 3 rungs high. Any other department identifying the need to use step ladders over 3 rungs high must contact the H&S department for support with their risk assessment and controls.

A work at height flow chart is found at Appendix 1.

4.3 Information Instruction, Training and Competency

Regulation 5 of the Work at Height Regulations 2005² refers to competence and states that employers should ensure that people engaged in any work at height activity, or using work equipment for that purpose, are competent to do so. A record of all training must be kept and monitored on a regular basis by the relevant manager.

University Hospitals of Morecambe Bay NHS Foundation Trust		ID No. Corp/Pol/131
Version No: 4	Next Review Date: 01/08/2020	Title: Work at Height
<i>Do you have the up to date version? See the intranet for the latest version</i>		

Contractors should be members of a reputable trade organisation which may provide guarantees, have a complaints procedure, and inspect the credentials of members and their work. Trade organisations such as the National Federation of Roofing Contractors, the Flat Roofing Alliance, the Single Ply Roofing Association, the Mastic Asphalt Council and the Rural and Industrial Design and Building Association offer such assurances. Workers who erect mobile scaffold tower units should be trained and competent people who are following a safe method of work. There are two approved methods recommended by the Prefabricated Access Suppliers' and Manufacturers' Association (PASMA), which have been developed in co-operation with the Health and Safety Executive (HSE): the 'advanced guard rail' system and 'through the trap' ('3T'). Advice on these two methods is given in Health and safety in construction HSG150³ and Tower scaffolds CIS10⁴.

All staff who use ladders must have received certificated instruction in ladder safety and how to check and erect a ladder correctly.

Staff members using step-stools, "hop-ups" or a maximum of 3 rung steps need to complete the mandatory training workbook. A visual inspection checklist can be found in Appendix 2.

Staff members using stepladders with over 3 rungs must have had instruction from a competent person in how to set up and use step ladders safely. This training must be recorded and refreshed every 3 years. This will be accessed via the Estates Department which arranges certificated training on an annual basis.

Staff members using collapsible stepladders or surveyors ladders need to have specific training or instruction on their use. This training must be recorded.

Refresher training will be delivered to all relevant staff 3 yearly and a register of all competent users kept. It is mandatory that when using scaffolds, fall arrest and cherry pickers/nifty lifts that all this training must be certificated in order to validate staff competence. Staff must also be competent with regard to emergency procedures when using such equipment.

4.4 Roof Access

There will be a local site policy/ procedure for access to the roofs. Any areas vulnerable to loading or point loading will be specified. This procedure will be operated and maintained by the Estates Management Team. No contractor will be permitted access to the roof without a Roof Access Permit as per the Control of Contractors Policy. This will be issued by the Estates Management Team unless the area has been handed over to a contractor, in which case access is managed by the contractor.

There are a small number of fire exits which give access to roofs and safe access and use of these is covered in Fire training.

In all locations, hooped vertical ladders will be locked at the bottom and access controlled by Estates.

If access to a roof is required where vents emit on to roofs e.g. from path lab, aseptic suite mortuary etc, coordination will take place with occupiers of building to ensure that emissions do not put those working on the roof at risk. Risk assessment and local access procedures must be in place.

University Hospitals of Morecambe Bay NHS Foundation Trust		ID No. Corp/Pol/131
Version No: 4	Next Review Date: 01/08/2020	Title: Work at Height
<i>Do you have the up to date version? See the intranet for the latest version</i>		

4.5 Selection of work equipment

When work equipment for working at height is selected consideration must be given to providing collective protection measures rather than personal protection measures. For examples please see the toolkit.

All work equipment must comply with Provision and Use of Work Equipment Regulations (PUWER)⁵ and Lifting Operations and Lifting Equipment Regulations (LOLER)⁶ as appropriate. Both of these regulations require that all equipment is fit for purpose and regularly inspected / examined by competent persons. A register of all equipment and inspection/examination regimes must be held centrally within the relevant department and monitored on a regular basis.

The law says that ladders can be used for work at height when a risk assessment has shown that using equipment offering a higher level of fall protection is not justified because of the low risk and short duration of use; or there are existing workplace features which cannot be altered. Short duration is not the deciding factor in establishing whether use of a ladder is acceptable or not – the level of risk is most important and this influences the proportion of effort expected to make that task safe. However as a guide, if the task would require staying up a leaning ladder or stepladder for more than 30 minutes at a time, alternative equipment must be considered.

Ladders should only be used in situations where they can be used safely, e.g. where the ladder will be level and stable, and where it is reasonably practicable to do so, the ladder can be secured. If this cannot be achieved, the work must be re-designed or other access equipment must be used. Straight ladders will only be permitted for use by the Estates Department. No other department will be permitted to use straight ladders.

Where step ladders are considered for lower level work at height, pulpit-steps with built-in guard rails will be used as standard.

4.6 Fragile Work Surfaces

A register of all fragile roof areas is kept by the Estates Department and monitored on a regular basis.

Metal profiled roofing sheets are frequently used and the following risk factors must be considered and detailed in the CDM file:

- Non-fragility: most industrial-grade profiled sheets, including roof lights, are now available to achieve a non-fragile status when installed. Designers should make sure that such specifications are followed during procurement and construction. A reduction in the thickness of the profiled sheeting, to save on cost, may result in a non-fragile specification becoming a fragile construction
- Longevity: whatever roofing assembly has been specified, all non-fragile roofs will deteriorate with time, and at some point the assembly will become fragile. Designers should therefore determine the design life of the roof and specify the roofing materials that will provide non-fragility for this period. Such information must be included in the health and safety file for the building. Environmental issues may also affect longevity
- Material weight: with an increasing need to provide better-insulated and more airtight buildings there is a growing need for thicker, longer and therefore heavier roof panels.

University Hospitals of Morecambe Bay NHS Foundation Trust		ID No. Corp/Pol/131
Version No: 4	Next Review Date: 01/08/2020	Title: Work at Height
<i>Do you have the up to date version? See the intranet for the latest version</i>		

Designers must consider the safety issues with handling the materials that they specify.

- No person will be permitted to work on / pass across/from or near a fragile work surface, unless a platform, covering, or guard rail or similar means of support or protection is in place. If there is still a risk of falling even with these precautions in place then sufficient measures must be taken to minimise the distance and consequence of the fall.

Warning signs must be provided at the approach to the fragile surface.

4.7 Falling Objects

Suitable and sufficient steps should be taken to prevent the fall of any material or object.

Netting fan-guards and toe boards are used as standard.

No items should be thrown or tipped from heights. Chutes, lifts or hoists must be used in all cases.

Where tubular scaffold is being erected, scaffolders will be required to follow all industry guidance and safe practice.

4.8 Danger Areas

If there is a risk of a person falling a distance or being struck by a falling object e.g. whilst scaffold is being erected then steps must be taken to prevent unauthorised persons from entering the area, e.g. signs and barriers, exclusion zones, locked-off areas.

4.9 Inspection of Work Equipment

Where work equipment used for work at height depends for safety on how it is installed or assembled, it must be inspected by a competent person before it is used and the results of the inspection be recorded:

- For equipment installed or handed over to a Contractor, by the contractor's competent person
- For equipment installed on behalf of the trust for use by any authorised person, by the competent person for the Trust

All work equipment exposed to conditions (i.e. bad weather) causing deterioration, e.g. ladders stored outside, working platforms etc, must be inspected by a competent person at suitable intervals, or after each incident which is liable to jeopardise the safety of the work equipment. Details of the inspection must be recorded.

In the case of tubular scaffold a scaffold register must be kept. The Trust will appoint an Authorised Person who will perform the statutory checks when this scaffold is used by Trust staff.

No fixed working platform will be used for work, or from which a person could fall unless it has been inspected in that position within the last 7 days.

Pre-use checks to spot any obvious visual defects are required before the use of any

University Hospitals of Morecambe Bay NHS Foundation Trust		ID No. Corp/Pol/131
Version No: 4	Next Review Date: 01/08/2020	Title: Work at Height
<i>Do you have the up to date version? See the intranet for the latest version</i>		

access equipment to make sure it is safe to use.

A pre-use check should be carried out:

- by the user;
- at the beginning of the working day;
- after something has changed, e.g. a ladder has been dropped or moved from a dirty area to a clean area (check the state or condition of the feet).

4.10 Inspection of places of work at height

The surface of every parapet, permanent rail or other such fall protection measure of every place of work at height must be checked on each occasion before the place of work at height is used.

Temporarily installed edge protection must be inspected as per scaffold requirements.

4.11 Emergency Procedures

Under the Work at Height Regulations 2005², emergency procedures must be considered for circumstances such as stuck access equipment and deployed fall arrest, so that a person or people can be rescued. There must be a plan in place that outlines how someone would be recovered should they fall.

The method of rescue needs to be proportionate to the risk and you should not rely on the emergency services. The method of rescue may be simple, such as putting a ladder up to a net and allowing the fallen person to descend, or lowering a worker hanging on a deployed lanyard onto the surface below.

The rescue plan should include:

- details of the rescue equipment to be used;
- configuration of the equipment for different types of rescue;
- identification of anchor points where necessary;
- limitations of the plan for adverse weather such as high winds; and
- the need for trained rescue personnel.

4.12 Statutory Duties

Regulation 4(1) of the Work at Height Regulations 2005² states: Every employer shall ensure that work at height is properly planned; appropriately supervised; and carried out in a manner which is so far as is reasonably practicable safe.”

Regulation 9(2) of the Work at Height Regulations 2005² states: “Where it is not reasonably practicable to carry out work safely and under appropriate ergonomic conditions without passing across or near, or working on, from or near, a fragile surface, every employer shall:

- (a) ensure, so far as is reasonably practicable, that suitable and sufficient platforms, coverings, guard rails or similar means of support or protection are provided and used so that any foreseeable loading is supported by such supports or borne by such protection;
- (b) where a risk of a person at work falling remains despite the measures taken under the preceding provisions of this regulation, take suitable and sufficient measures to

University Hospitals of Morecambe Bay NHS Foundation Trust		ID No. Corp/Pol/131
Version No: 4	Next Review Date: 01/08/2020	Title: Work at Height
<i>Do you have the up to date version? See the intranet for the latest version</i>		

minimise the distances and consequences of his fall.”

The Health and Safety at Work Regulations 1974⁷ and the Management of Health and Safety at Work Regulations 1999¹ also apply.

5. ATTACHMENTS	
Number	Title
Appendix 1	Work at Height Flow Chart
Appendix 2	Equality & Diversity Impact Assessment Tool

6. OTHER RELEVANT / ASSOCIATED DOCUMENTS	
Unique Identifier	Title and web links from the document library
Corp/Pol/002	Control of Contractors http://uhmb/cs/tpdl/Documents/CORP-POL-002.docx

7. SUPPORTING REFERENCES / EVIDENCE BASED DOCUMENTS	
References in full	
Number	References
1	The Stationery Office (TSO) (1999) (SI 1999 No.3242) Management of Health and Safety at Work Regulations 1999 (accessed 01/05/2017)
2	The Stationery Office (TSO) (SI 2005 No.735) Work at Height Regulations 2005 (accessed 01/05/2017)
3	Health and Safety Executive (HSE) (2006) Health and safety in Construction HSG 150 (accessed 01/05/2017)
4	Health and Safety Executive (HSE) Tower Scaffolds (accessed 01/05/2017)
5	The Stationery Office (TSO) (1998) Provision and Use of Work Equipment Regulations (PUWER) 1998 (accessed 01/05/2017)
6	The Stationery Office (TSO) (1998) (SI 1998 No.2307) The Lifting Operations and Lifting Equipment Regulations 1998 (accessed 01/05/2017)
7	Great Britain (1974) Health and Safety at Work Act 1974 (accessed 01/05/2017)

University Hospitals of Morecambe Bay NHS Foundation Trust	ID No. Corp/Pol/131
Version No: 4	Next Review Date: 01/08/2020
Title: Work at Height	
<i>Do you have the up to date version? See the intranet for the latest version</i>	

8. DEFINITIONS / GLOSSARY OF TERMS	
Abbreviation or Term	Definition
Work at height	Work at height – work in any place, including a place at or below ground level (eg something you can fall into), and obtaining access to or egress from such place while at work, except via a staircase in a permanent workplace, where if measure were not taken, a person could fall a distance liable to cause personal injury.
Ladder	Ladder – includes a fixed ladder and step ladder.
Fragile surface	Fragile surface – surface which would be liable to fail if any reasonably foreseeable loading were to be applied to it, (eg glass).
Line	Line – includes rope, chain or webbing.
Personal fall protection system	Personal fall protection system – fall prevention, work restraint, work positioning, fall arrest or rescue system, other than a system in which the only safeguards are collective safeguards, or rope access and positioning techniques.
Work equipment	Work equipment – any machinery, appliance, apparatus or tool
Working platform	Working platform – any platform used as a place of work or as a means of access/egress to/from a place of work. This includes any scaffold, suspended scaffold, cradle, mobile elevating working platform e.g. cherry pickers, trestle, gangway, gantry and stairway which is so used.
Existing workplace	This is a place that is already safe for example, a roof with permanent guard rails or a parapet around the edges; or a piece of plant or equipment that has fixed, permanent guard rails around it.
Appointing Officer	The person responsible for appointing a contractor. This will NOT necessarily be an officer within the Estates department.

9. CONSULTATION WITH STAFF AND PATIENTS		
Enter the names and job titles of staff and stakeholders that have contributed to the document		
Name	Job Title	Date Consulted
	Health and Safety Reps, champs and health advocates	21/06/2017
	Health and Safety Committee Members	22/06/2017

University Hospitals of Morecambe Bay NHS Foundation Trust	ID No. Corp/Pol/131
Version No: 4	Next Review Date: 01/08/2020
Title: Work at Height	
<i>Do you have the up to date version? See the intranet for the latest version</i>	

10. DISTRIBUTION PLAN	
Dissemination lead:	Anna Smith
Previous document already being used?	Yes
If yes, in what format and where?	Available on the Intranet
Proposed action to retrieve out-of-date copies of the document:	Replace document on the Trust Intranet – Policy library
To be disseminated to:	Library Service Chairperson of approving Committee Divisional General Managers Divisional Nurse or AHP Divisional Clinical Director
Document Library	
Proposed actions to communicate the document contents to staff:	Disseminate via H&S Management Group Promote via the Health and Safety notice boards and intranet Include in the UHMB Friday Corporate Communications Roundup – New documents uploaded to the Document Library

11. TRAINING		
Is training required to be given due to the introduction of this policy? No		
Action by	Action required	Implementation Date

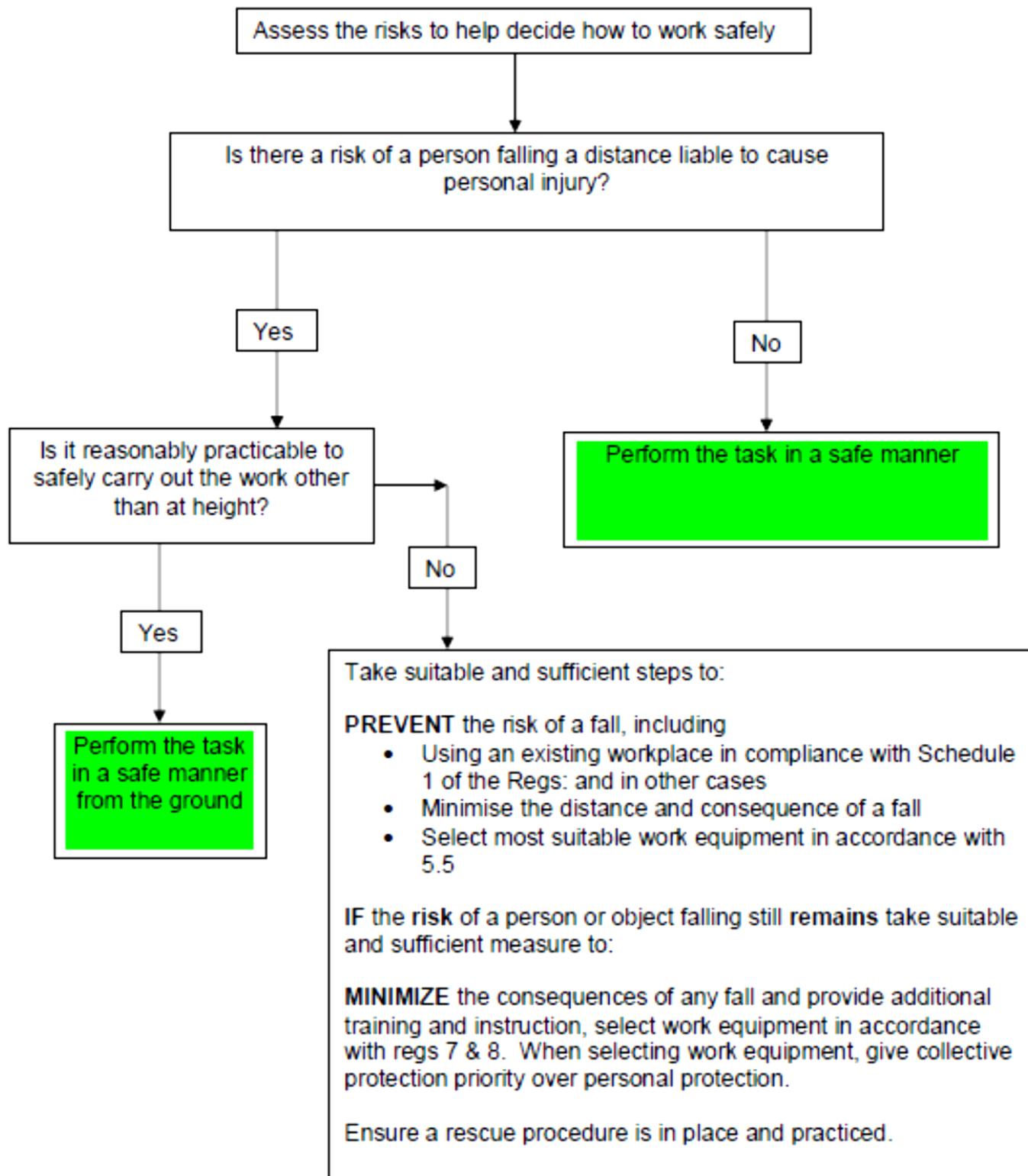
12. AMENDMENT HISTORY				
Version No.	Date of Issue	Page/Selection Changed	Description of Change	Review Date
2			Reformatted and amended to comply with current legislation	
2	Aug 2011	Section 5.2 Page 8	Competencies are clearly defined	Aug 2014
2	Aug 2011	Section 7 Page 12	Monitoring section more defined	Aug 2014
2	Aug 2011	Section 5.5.1 Page 5	Removal of information which is now part of a work at height toolkit	Aug 2014
		Section 5.6 Page 10	Removal of information which is now part of a work at height toolkit	Aug 2014
3	June 2014	All	Update of terms and job titles. Detail enhanced for clarity in many sections	Aug 2017
4	July 2017	4.3 Information Instruction,	Reference made to new appendix	01/08/2020

University Hospitals of Morecambe Bay NHS Foundation Trust		ID No. Corp/Pol/131
Version No: 4	Next Review Date: 01/08/2020	Title: Work at Height
<i>Do you have the up to date version? See the intranet for the latest version</i>		

		Training and Competency		
4	July 2017	Appendix 2	Insertion of new appendix – Visual Inspection Checklist	01/08/2020

University Hospitals of Morecambe Bay NHS Foundation Trust		ID No. Corp/Pol/131
Version No: 4	Next Review Date: 01/08/2020	Title: Work at Height
<i>Do you have the up to date version? See the intranet for the latest version</i>		

Appendix 1: Work at Height Flow Chart



University Hospitals of Morecambe Bay NHS Foundation Trust		ID No. Corp/Pol/131
Version No: 4	Next Review Date: 01/08/2020	Title: Work at Height
<i>Do you have the up to date version? See the intranet for the latest version</i>		

Appendix 2: Visual Inspection Checklist for Stepladders & Kick Stools

Ladder No:		Type Of Ladder:	
Date:		Date Of Next Check:	
Inspected By:		Signature:	

	Acceptable Condition <input type="checkbox"/>	Needs Repair <input type="checkbox"/>	If Applicable Sign and Date Once Actioned:
All Stepladders			
General condition			
Clean and dry, free from paint, oil, mud etc.			
No missing or loose steps or rungs			
No loose nails or screws bolts			
No loose or bent hinges			
No split, worn, broken –steps or rungs			
No damaged or worn non-slip bases			
No corrosion, sharp edges or dents			
Stable when erected – no side to side wobble			
Identification number clearly visible			
Step stools /Elephant Foot Stools/Hop ups Only			
Locks in to place as per design			
Rubber matting present and in good condition			

University Hospitals of Morecambe Bay NHS Foundation Trust	ID No. Corp/Pol/131
Version No: 4	Next Review Date: 01/08/2020
Title: Work at Height	
<i>Do you have the up to date version? See the intranet for the latest version</i>	

Equality Impact Assessment Form

Department/Function	Health and Safety			
Lead Assessor	Nicola Chelton			
What is being assessed?	Work at Height			
Date of assessment	13/07/17			
What groups have you consulted with? Include details of involvement in the Equality Impact Assessment process.	Equality of Access to Health Group	<input checked="" type="checkbox"/>	Staff Side Colleagues	<input checked="" type="checkbox"/>
	Service Users	<input checked="" type="checkbox"/>	Staff Inclusion Network/s	<input checked="" type="checkbox"/>
	Personal Fair Diverse Champions	<input checked="" type="checkbox"/>	Other (Inc. external orgs)	<input checked="" type="checkbox"/>
	Please give details:			

1) What is the impact on the following equality groups?

Positive:		Negative:		Neutral:	
<ul style="list-style-type: none"> ➤ Advance Equality of opportunity ➤ Foster good relations between different groups ➤ Address explicit needs of Equality target groups 		<ul style="list-style-type: none"> ➤ Unlawful discrimination, harassment and victimisation ➤ Failure to address explicit needs of Equality target groups 		<ul style="list-style-type: none"> ➤ It is quite acceptable for the assessment to come out as Neutral Impact. ➤ Be sure you can justify this decision with clear reasons and evidence if you are challenged 	
Equality Groups	Impact (Positive / Negative / Neutral)	Comments			
Race (All ethnic groups)	Neutral	<ul style="list-style-type: none"> ➤ Provide brief description of the positive / negative impact identified benefits to the equality group. ➤ Is any impact identified intended or legal? Neutral: This policy applies equally to all Equality Groups and aims to provide a safe working environment for all.			
Disability (Including physical and mental impairments)	Neutral				
Sex	Neutral				
Gender reassignment	Neutral				
Religion or Belief	Neutral				
Sexual orientation	Neutral				
Age	Neutral				
Marriage and Civil Partnership	Neutral				
Pregnancy and maternity	Neutral				
Other (e.g. caring, human rights)	Neutral				

2) In what ways does any impact identified contribute to or hinder	N/A
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University Hospitals of Morecambe Bay NHS Foundation Trust	ID No. Corp/Pol/131
Version No: 4	Next Review Date: 01/08/2020
Title: Work at Height	
Do you have the up to date version? See the intranet for the latest version	

promoting equality and diversity across the organisation?

- 3) If your assessment identifies a negative impact on Equality Groups you must develop an action plan **to avoid discrimination and ensure opportunities for promoting equality diversity and inclusion are maximised.**
- This should include where it has been identified that further work will be undertaken to further explore the impact on equality groups
 - This should be reviewed annually.

Action Plan Summary

Action	Lead	Timescale
N/A		

This form will be automatically submitted for review for Policies and Procedures once approved by Policy Group. For all other assessments, please return an electronic copy to EIA.forms@mbht.nhs.uk once completed.

University Hospitals of Morecambe Bay NHS Foundation Trust	ID No. Corp/Pol/131
Version No: 4	Next Review Date: 01/08/2020
Title: Work at Height	
<i>Do you have the up to date version? See the intranet for the latest version</i>	