

WORKING SAFELY AT HEIGHTS

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1. Purpose & Scope

We are committed to ensuring all individuals are informed of the risks associated with working at heights on our sites. We have a system in place which meets or exceeds WorkSafe's [Best Practice Guideline for Working At Heights](#).

This policy covers the following requirements:

- Planning and risk assessment for safe work at heights
- Supervision and Training requirements
- Protection of workers from fall and dropped objects risk

This policy applies to all staff members, students, contractors and consultants who operate on Wintec owned and controlled sites.

2. Policy Statement

The [Health & Safety at Work Act 2015](#) requires People in Charge of the Business or Undertaking (PCBU) to work collectively to support a harm free workplace. Contractors, sub-contractors and consultants are by legal definition PCBU's and have a legal responsibility to ensure they are aware of and comply with our policies and procedures.

Every year in New Zealand workers are exposed to un-necessary risk when working at height. The most common causes of workers being put at risk are listed below:

- lack of or inadequate planning and hazard assessment
- inadequate supervision
- insufficient training for the task being carried out
- incorrect protection or equipment choices
- incorrect use or set-up of equipment including personal protective equipment
- unwillingness to change the way a task is carried out when a safer alternative is identified
- suitable equipment being unavailable

We are committed to ensuring that these risks and all others associated with working at heights are mitigated.

A good record of the planning process and communications with clients, contractors, workers, and other site visitors must be maintained. This policy should be read in conjunction with our policies on:

- Managing Electrical Hazards
- Health & Safety Risk Management (TBD)
- Accident & Incident Reporting

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- Critical Incident Management
- Managing Contractors

3. Key Roles & Expectations

Wintec and the PCBU responsible for performing work at height have specific duties under the [Health & Safety at Work Act 2015](#). The following roles have key responsibilities:

Students

- Must not enter any areas of Wintec where anyone is working at heights Wintec staff members or contractors are undertaking work at heights
- if a student identifies a health and safety risk with a contractor, they are required to notify a Wintec staff member and if possible, enter an observation into vault as soon as is practicable.

All Staff

- Must not enter any areas of Wintec where anyone is working at heights, unless authorised to be there
- ensure that work being undertaken at height within their areas of responsibility are well planned and executed safely to prevent harm to fellow staff, students, contractors and students.

Principal Hiring Manager / Project Manager

- Responsible for ensuring that all work at height performed in their area has been well planned with input from both Wintec and the contractor performing the work
 - responsible for ensuring the work is regularly reviewed by way of a documented audit process
 - communicate any audit findings to the Contractor PCBU and the Wintec PCBU person in charge of the work and Wintec's Safety & Wellbeing Manager
 - on completion of the work, must undertake a review of the work, and the person working at height
 - where working at heights are involved, the project manager or other Wintec staff member must have received the appropriate training
- Note:** This role can be performed by a specific project manager (typically for larger works), another Wintec staff member (the Wintec PCBU), or an external contractor.

Tutor Teaching at Height

- Where teaching staff instruct students working at heights, the tutor must ensure planning and risk assessment has taken place, including a site-specific risk assessment and safety plan
- responsible for ensuring students are taught and follow correct safety procedures and best practice, including the correct use of any Personal Protective Equipment (PPE) provided by Wintec for the purposes of teaching.

Persons Working at Height

- Performs the required working at height
- can be a Wintec staff member, contractor, or other person, but must be trained in working at heights

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- responsible for ensuring the work is well planned with input from the Wintec person in charge
 - ensures that all work at height is undertaken in a manner which aligns with the hierarchy of controls as per this policy and WorkSafe's good practice guideline for safe work at heights
 - must have the appropriate PPE
 - ensures that no action or inaction on their behalf leads to a health and safety incident occurring whilst the work is being undertaken
 - reports any event or incident that breaches or is a suspected breach of this policy.
- Wintec Person in Charge of the Work (PCBU)**
- Responsible for arranging an audit of the worksite to ensure health and safety practices are being followed
 - can be a specific project manager (typically for larger works), another Wintec staff member, or an external contractor.
- Safety & Wellbeing Manager**
- Reports to Worksafe
 - can consult with and give advice to Wintec staff members and the Infrastructure & Assets team on the creation of JSAs, audits, and safety plans
 - formally notifies WorkSafe of particularly hazardous work.
- Department Head, HOS/ Centre Director)**
- Ensures the audit process is completed and documented evidence collected of active engagement by both Wintec and the contractor PCBU through the planning phase of the work.
- Strategic Assets Manager**
- Support the wider Wintec team to ensure the requirements within this policy are effectively applied in every circumstance
 - ensures annual testing of any Wintec owned or provided PPE related to working at heights, as well as anchor points on Wintec owned or managed sites
 - responsible for the day-to-day management of this policy.
- Executive Director, Infrastructure & Assets**
- Holds overall responsibility for the implementation of this policy.
- Executive Group**
- Ensures that Wintec meets its statutory and accountability obligations.

4. Measuring Success

Measurement of success for safe working at heights will be measured in the following ways:

- Documented evidence by way of Job Safety Analysis (JSA) sheets showing engagement between Wintec and the contractor PCBU in the safe planning of work at height, for every project.
- Documented evidence of regular auditing of the worksite by the Project Manager or other Wintec person in charge of the work.

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- Evidence of input by both Wintec and the contractor PCBU into the documented risk assessment for the work.
- Documented evidence of the engagement from both Wintec and the contractor PCBU into the post contract review process.

5. Supporting Information

5.1. The Hierarchy of Controls

Where the potential of a fall exists, the following simple hierarchy of controls must be considered before work or student-related activities commence. Consider:

- Can the job be done without exposing people to the hazard (eliminate) Eliminating risks can often be achieved during the design, construction planning and tendering stages.
- If elimination is not possible, what steps can be taken to minimise the risk to people from the hazard (isolate) Safe working platforms, guardrail systems, edge protection, scaffolding, elevated work platforms, mobile scaffolds and barriers that restrict access can all be used to isolate people from the hazard.
- If elimination and isolation are not possible, then steps must be taken to minimise the likelihood of any harm resulting. This could be the use of work positioning systems or travel restraint systems.
- If work is above five metres from the ground has notification been sent of particularly hazardous work to WorkSafe NZ.

A hazard/risk assessment **must** be carried out for all work at heights, whether as part of our business activities or for activities related to educational purposes. Throughout all, relevant users, be they staff members, contractors or students must be appropriately informed of the risks.

Doing nothing is not an option. The below structure of Eliminate, Isolate and Minimise shall be used for planning all work at height activities:

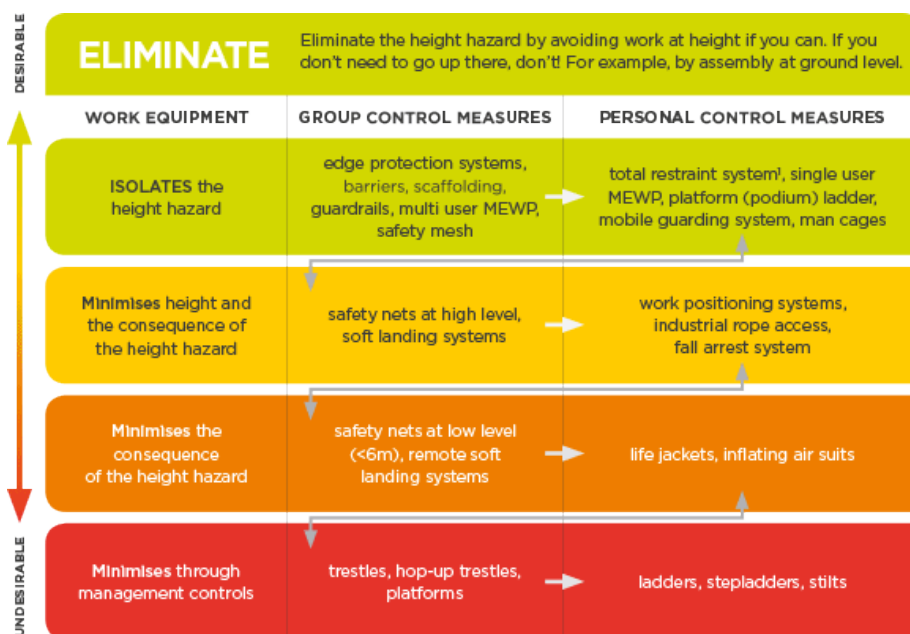


Figure 1: The selection of work equipment linked to hierarchy of controls (Best Practice Guidelines for Working at Height in New Zealand, WorkSafe, 2018)

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6. Procedures

The following procedures must be followed to ensure safe working at heights:

6.1. Planning and Risk Assessment for Safe Working at Heights

Wintec requires all people involved with work at height activities to have undertaken a site-specific risk assessment prior to any site materials being placed.

The risk assessment must be documented and answer the following questions:

- Can the job be done without exposing people to work at height risks? If the answer is no, then:
- Can the job be done from behind rated handrails? If the answer is no, then:
- Can the job be done with limited frequency to a fall risk in a harness in fall restraint? If the answer is no, then:

The job must be planned in such a manner that the above conditions are met. This includes completing a Job Safety Analysis (JSA) if one does not already exist and is up-to-date.

For more information on planning work at heights, risk assessments and a suitable hierarchy of controls, refer to *Section 5. Supporting Information*. You can also refer to WorkSafe's [Best Practice Guideline for Working At Heights](#).

6.2. Notification of Particularly Hazardous Work

The [Health and Safety in Employment Regulations 1995](#) require employers as well as the person who controls a place of work to provide at least **24 hours' notice** to WorkSafe of particularly hazardous work. This is so WorkSafe can organise a workplace visit if they deem it necessary, prior to work commencing.

Examples of particularly hazardous work include (but are not limited to):

- Logging or tree felling undertaken for commercial purposes
- construction work with a risk of falling 5 Metres or more
- erecting or dismantling scaffolding with a risk falling 5 metres or more
- use of a lifting appliance where the appliance must lift a mass of 500 kilograms or more a vertical distance of 5 metres or more
- work in any pit, shaft, trench, or other excavation in which any person is required to work in a space more than 1.5 metres deep and having a depth greater than the horizontal width at the top
- work in any drive, excavation, or heading in which any person is required to work with a ground cover overhead

In all instances where particularly hazardous work is to be undertaken, you must notify the Safety & Wellbeing Manager before commencing. The Safety & Wellbeing Manager will [notify WorkSafe](#). If you are unsure whether the work meets the criteria for particularly hazardous, consult with the Safety & Wellbeing Manager. For more information on Particularly Hazardous Works, refer to *Section 9. Key Definitions & Glossary*.

Note: Most heights-related educational activities will not require notification. However, if in doubt check with the Safety & Wellbeing Manager.

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6.3. Supervision and Training Requirements

We require all staff members and contractors undertaking work at heights to hold the appropriate qualifications and levels of competency as required by the WorkSafe NZ [Best Practice Guideline for Working At Heights](#) and all other industry related best practice guidelines including but not limited to Arboriculture and Outdoor Adventure.

All work at height to be undertaken on behalf of Wintec must have a Wintec staff member assigned who will liaise with the people undertaking the work on a frequent basis to ensure the following:

- H&S standards are being met and our H&S policies, procedures and systems are being adhered to.
- The person working at heights is following the relevant JSA.
- Work at height is done in a safe manner including verification that exclusion zones are in place in the areas under which the work is being undertaken.
- Regular risk assessments are being completed and if changes in the work occur these are being documented by the workers.
- Two-way regular communication occurs between the Wintec supervisor and the workers which includes details of near misses, incidents and opportunities for improvement which are to be documented in [Vault](#).
- Verify that the emergency response plan is workable and that the workers have undertaken a trial to ensure they can effectively lower someone safely from height if required. Any emergency planning for working at heights shall meet the requirements of the Wintec Emergency Management Systems, including the ability to record events in [Vault](#).

For more information, refer to our [Coordinated Incident Management](#) policy .

If harnesses are being worn the PCBU must ensure that the anchor point has been verified by an engineer to ensure there is no risk of the anchor point failing (checked at least annually). The anchor point must also be inspected by the person working at height or tutor teaching at height on a daily basis while work or teaching in being undertaken, to verify it is safe to use. Any concerns should be reported to the Infrastructure & Assets team (if work related) or the Safety & Wellbeing Manager (if related to teaching). Work should not progress until all concerns have been resolved.

6.4. Protection of workers from dropped or falling objects

The Health and Safety at Work Act Regulations require that the risk of falling or dropped objects be managed effectively. We have implemented the following process to meet this requirement: The use of a dedicated exclusion zone with a perimeter which acknowledges the risk of bouncing falling or dropped objects.

- The exclusion zone will be visible with a sign on site indicating it's a no-go zone while work is being undertaken above.
- The exclusion zone can only be lifted once the work has ceased and the exclusion zone will be reinstated prior to work beginning again.
- A Breach of the exclusion zone for the purposes of this procedure will be deemed as serious misconduct.

6.5. Post Work Review

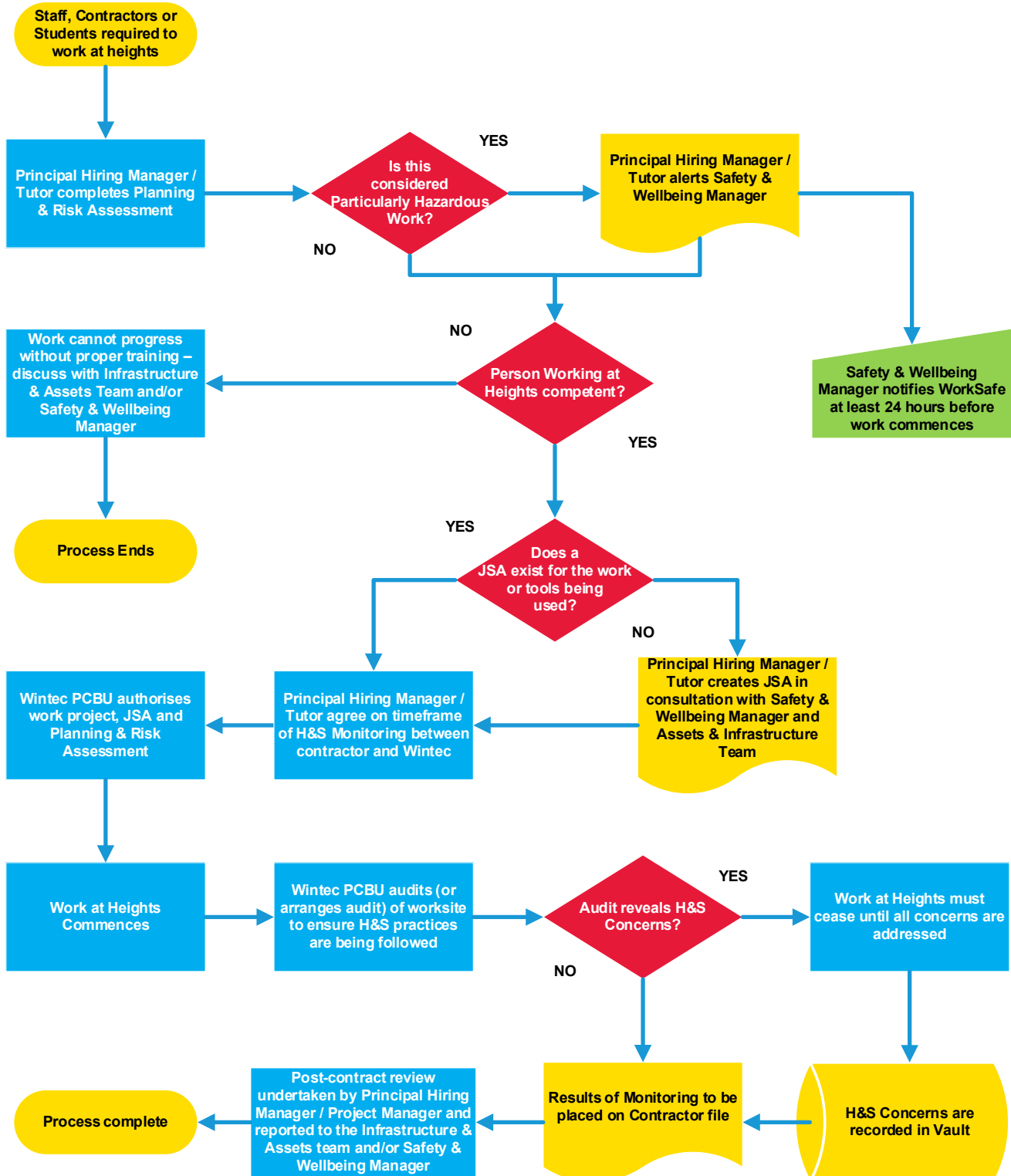
On completion of the work, the Principal Hiring Manager/Project Manager must undertake a review of the work, and the person working at height. Any issues should be reported to the Infrastructure &

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Assets team (for commercial work) or the Safety & Wellbeing Manager (for both commercial work and education-related issues)

7. Processes

7.1. Working at Heights



Printed Copies are not Controlled. Please refer to Wintec's Policy Web for the most current version.

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8. Related Legislation, Regulations, Policies, Guidelines, and Forms

Legislation/Regulations	Policies	Guidelines/Forms
Health and Safety at Work Act 2015	Coordinated Incident Management Policy	WorkSafe NZ Best Practice Guidelines for safe work at height in New Zealand
Health and Safety at Work Regulations 2016	Records & Information Policy Managing Contractors Policy Managing Electrical Hazards Policy Health & Safety Risk Management Policy (TBD) Accident & Incident Reporting Policy	Site-Specific Risk Assessment Job Safety Analysis Site-Specific Safety Plan
<p>Copies of New Zealand Legislation can be found on the New Zealand Legislation Website. You can view Wintec's Policies and Procedures on the Policy Web. This is not an exhaustive list of policies, procedures and legislation.</p>		

9. Key Definitions & Glossary

Key definitions and glossary for the safe working at height policy can be found below:

- Codes of practice**
- [Code of Practice for Safety and Health in Tree Work Part One: Arboriculture](#)
 - [Approved Code of Practice for Cranes](#)
 - [Best Practice Guidelines Excavation Safety](#)
 - [Approved Code of Practice for Training Operators and Instructors of Powered Industrial Lift Trucks \(Forklifts\)](#)
 - [Code of Practice for Manual Handling](#)
 - [Best Practice Guidelines for Mobile Elevating Work Platforms](#)
 - [Safe Use of Elevating Work Platforms in the Horticulture Industry](#)
- Dropped objects** Any item left unrestrained at height which has the potential to fall causing harm.
- Dedicated Exclusion zone** Defined demarcated area below the work area above which is off limits to anyone entering to ensure the safety of people in the wider area.
- JSA** A job safety analysis is a procedure which helps integrate accepted safety and wellbeing principles and practices into a task or job operation. In a JSA, each basic step of the job is to identify potential hazards and to recommend the safest way to do the job.
- Particularly Hazardous Work** The [Health and Safety in Employment Regulations 1995](#) require Wintec to notify WorkSafe at least 24 hours' notice of our intention to undertake particularly hazardous work, as defined below:
- Construction work with a risk of falling 5 metres or more
- Excludes:

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- work on overhead telecommunications lines and overhead electric power lines
- work carried out from ladder only
- maintenance and repair work of a minor or routine nature.
- Erecting or dismantling scaffolding with a risk of falling 5 metres or more
- Logging or tree felling undertaken for commercial purposes
- Use of a lifting appliance where the appliance has to lift a mass of 500 kilogrammes or more a vertical distance of 5 metres or more (see exclusions below)

Excludes:

- work using an excavator
- work using a forklift, or
- work using a self-propelled mobile crane
- Work in any drive, excavation, or heading in which any person is required to work with a ground cover overhead
- Work in any excavation in which any face has a vertical height of more than 5 metres and an average slope steeper than a ratio of 1 horizontal to 2 vertical
- Work in any pit, shaft, trench, or other excavation in which any person is required to work in a space more than 1.5 metres deep and having a depth greater than the horizontal width at the top
- Work involving the use of explosives, or storage of explosives for use at the worksite
- Work in which a person breathes compressed air, or a respiratory medium other than air (including diving).

If the work to be completed meets the definition for particularly hazardous work then the Safety & Wellbeing Manager must be advised, so that Wintec can notify WorkSafe, at least 24 hours prior to commencing the work.

Works that do not require WorkSafe to be notified include:

- Any construction work or tree-felling required to deal with an emergency,
- damage caused by any earthquake, explosion, fire, flood, lightning, rain, slip, storm, or washout; or
- the blockage or breakdown of any drain or sewer; or
- the blockage or breakdown of any distribution system or network for electricity, gas, telecommunications, or water,

Note: Wintec staff members are expected to comply with our Coordinated Incident Management Policy and other applicable policies in the event of an incident or emergency.

PCBU

A PCBU is a 'person conducting a business or undertaking' is a broad concept as defined by the [Safety and Wellbeing at Work Act 2015](#). A PCBU may be an individual person (a sole trader) or an organisation, however in most cases a PCBU will be an organisation (a business entity such as a company). A PCBU does not include a person to the extent that the person

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is employed or engaged solely as a worker in, or as an officer of, the business or undertaking.

Site-Specific Risk Assessment A risk assessment adapted to a specific site, containing only relevant information for the particular project. Site specific risk assessments take into account the actual site conditions and type of project and address the relevant hazards.

Site-Specific Safety Plan The SSSP is an agreement between businesses working on a specific site that determines how Safety and Wellbeing will be managed. It ensures that relevant site information is regularly updated, and safety is monitored.

10. Records Management

In with the Public Records Act 2005, Wintec is required to provide an Information and Records Management programme to ensure that authentic, reliable and usable records are created, captured and managed to a standard of best practice, and to meet business and legislative requirements. All records relevant to a specific policy need to be listed in every policy in the following format:

Record	Minimum retention period	Disposal Action	GDA Reference #
This policy	7 years after date of last action	Destroy	5.1.2
Job Safety Analysis	7 years after date of last action	Destroy	10.6.2
Work at Height H&S Audit	7 years after date of last action	Destroy	10.6.2
Site-Specific Risk Assessment	7 years after date of last action	Destroy	10.6.2
Site-Specific Safety Plan	7 years after date of last action	Destroy	10.6.2

11. Version History

Version	Date Approved	Details
1	October 2019	First Published.