## 7 Working at Height

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Preface

This publication is prepared by the Defence Infrastructure Organisation (DIO) on behalf of the Defence Safety Authority (DSA), Ministry of Defence (MOD). In order to meet MOD’s obligations under the Health and Safety at Work Act 1974, these Safety Rules and Procedures (SRP) are mandatory to ensure the safety of personnel working at height on the defence estate, and anyone else who may be affected by such activities.

Personnel responsible for planning, supervising or undertaking work at height on those workplaces that have fixed access systems and are designated as Restricted High Places (RHPs) are to comply with the contents of this chapter. For guidance on all work at height activities other than on RHPs, reference is to be made to JSP 375 MOD Health and Safety Handbook, Part 2, Volume 1, Chapter 27 - Preventing Falls and Falling Objects.

The implementation of this chapter may involve various organisations and personnel responsible for the management and use of the defence estate, for example:

Commanding Officers/Heads of Establishment;
Customer Estate Organisations (CEstOs)
Safety, Health, Environment and Fire (SHEF) Officers/Advisers;
Defence Fire Risk Management Organisation (DFRMO)
MOD Agencies;
Military Units (e.g. Signals Units, Antenna Maintenance Units and Equipment Sponsors);
Project Sponsors;
DIO Project Teams;
DIO Infrastructure Managers;
Contractors (e.g. Prime Contractors, supply chain contractors, Infra-structure Service Providers and PFI contractors);
External organisations who site share on MOD facilities;
Organisations requiring access to a Restricted High Place;
Designers and Specifiers of new or refurbished facilities.
The implementation of this document may have responsibility and training implications for the above organisations and personnel.

The use of the male gender, when used in this document, should be taken to mean either gender.

The current version of this document will be maintained in the ‘Related Documents’ area of the DSA Occupational Health and Safety website. It is the responsibility of the user to ensure they are referring to the latest version of the document. Updates will be announced in Defence Instructions and Notices (DIN) and DIO Policy Instructions.

JSP 375 Part 2 Volume 3 has been devised for the use by MOD and its contractors in the execution of works in relation to the defence estate. The Crown hereby excludes all liability (other than liability for death or personal injury) whatsoever and howsoever arising (including, but without limitation, negligence on the part of the Crown, its servants or agents) for any loss or damage however caused where the Standard (JSP 375 Part 2 Volume 3) is used for any other purpose.

Compliance with MOD Safety Rules and Procedures does not of itself confer immunity from legal obligations.

In the case of conflict between these Safety Rules and Procedures and a statutory requirement, the latter is to be followed and the Director General DSA and the Senior Authorising Authority (Working at Height) (SAA(WaH)) are to be informed in writing addressed as below:

DG DSA
Level 6 Zone D
MOD Main Building
Whitehall
London
SW1A 2HB

SAA (Working at Height)
Defence Infrastructure Organisation
Kingston Road
Sutton Coldfield
B75 7RL

Acknowledgements

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Royal Navy – Navy Command
Army – Combat Service Support
Royal Air Force – Air Command
Defence Equipment and Support
Defence Infrastructure Organisation
Atkins Asset Management Limited
Carillion Enterprise Ltd
Babcock Group
Interserve FM Ltd
Turner Facilities Management Ltd
Develop Training Ltd
Morsafe Limited
Whitenap Consultancy Ltd
### Glossary of Abbreviations

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<td>4Cs</td>
<td>Cooperation, communication, coordination and control</td>
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<td>AC</td>
<td>Authorised Climber</td>
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<td>ACD</td>
<td>Anti-Climb Device</td>
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<td>AE(WaH)</td>
<td>Authorising Engineer (Working at Height)</td>
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<td>AP(WaH)</td>
<td>Authorised Person (Working at Height)</td>
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<tr>
<td>ATLAS</td>
<td>The Association of Technical Lightning &amp; Access Specialists</td>
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<td>AUM</td>
<td>All Up Mass</td>
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<td>CAE</td>
<td>Coordinating Authorising Engineer</td>
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<td>CAP(WaH)</td>
<td>Coordinating Authorised Person (Working at Height)</td>
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<td>Construction, Design and Management Regulations</td>
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<td>Chartered Engineer</td>
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<td>Chief Environmental and Safety Officer</td>
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<td>CEstO</td>
<td>Customer Estate Organisation</td>
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<td>Commanding Officer</td>
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<td>Defence Safety Authority</td>
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<td>HNC/HND</td>
<td>Higher National Certificate/Diploma</td>
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<td>Industrial Rope Access Trade Association</td>
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<td>ISP</td>
<td>Infrastructure Service Provider</td>
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<td>JSP</td>
<td>Joint Services Publication</td>
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<td>NDT</td>
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<td>Maintenance Management Organisation</td>
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<td>MOD</td>
<td>Ministry of Defence</td>
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<td>Restricted High Place</td>
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<td>RPC</td>
<td>Regional Prime Contract</td>
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<td>SAA(WaH)</td>
<td>Senior Authorising Authority (Working at Height)</td>
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<td>SIM</td>
<td>Senior Infrastructure Manager</td>
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<td>SHEF</td>
<td>Safety, Health, Environment and Fire</td>
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<td>Standing Instruction</td>
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<td>TB</td>
<td>Technical Bulletin</td>
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<td>WaH</td>
<td>Working at Height</td>
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<tr>
<td>WRS</td>
<td>Work Restraint System</td>
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Introduction

Working at Height on the Defence Estate

7.1.1 Working at Height is defined as any work undertaken at any place above, at or below ground level, from which, if measures were not taken, a person could fall a distance liable to cause injury. It includes gaining access to or egress from such a place except by means of a staircase in a permanent workplace.

7.1.2 Working at height is acknowledged as one of the most dangerous activities in the construction, maintenance and facilities management industries. Amongst many hazards and associated risks, working at height exposes workers to the risk of falls from height, and others being hit by objects that may fall from height.

7.1.3 The Work at Height Regulations are subordinate regulations to the Health and Safety at Work etc Act 1974. The Regulations place a responsibility on employers and all persons, in his employ or under his control, engaged with the planning, supervision and carrying out of work at height to manage the risks involved.

7.1.4 In order to comply with The Work at Height Regulations all work at height activities, including those on HM ships in commission should be undertaken in accordance with the guidance given in JSP375 Part 2, Volume 1, Chapter 27 ‘Prevention of Falls and Falling Objects’. Work at height activities on shore based workplaces that are installed with permanent fixed access systems (e.g. ladders, step-irons, a structure’s lattice frame etc.) including those access systems in permanently berthed ships are to be undertaken in accordance with the requirements of this chapter.

7.1.5 A workplace that is at height and has been assessed, and presents a significant risk of a fall liable to cause personal injury is to be designated a Restricted High Place (RHP). Access to an RHP is to be controlled and is subject to the rules and procedures as mandated by this chapter. See sections 7.2.1 onwards for the definition of an RHP.

Scope and Limitations

Scope

7.2.1 This document sets out the Safety Rules and Procedures (SRP) relating to work at height on those workplaces that are designated as Restricted High Places (RHP), as listed in the establishment’s Register of Restricted High Places.

7.2.2 All requirements of JSP 375 Part 2 Volume 3 Chapter 2 Common Requirements are to apply to this chapter, except where otherwise stated.

7.2.3 An RHP is a workplace with a permanently installed fixed access system that has been assessed and presents a significant risk of a fall liable to cause personal injury and/or exposure to other hazards within close range of the RHP.

7.2.4 RHPs are, for example, masts, towers and other buildings, plant rooms and installations including work platforms with permanent fixed access systems such as fixed ladders, step-irons, etc. A mast or tower structure which does not have a
fixed access system but is climbable by using its lattice frame may also to be designated as an RHP.

7.2.5 This chapter also applies, subject to risk assessment, to workplaces and facilities that are roof-top sites such as roofs of buildings, aircraft hangars, water towers and plant rooms when reached by a fixed access system.

7.2.6 This chapter's application covers protection from falls whilst accessing, egressing or working on an RHP, including places at or below ground level.

7.2.7 Additionally, this chapter covers safety rules and procedures for protection from exposure to other potential hazards that may exist whilst accessing, egressing or working on an RHP, such as radiation, moving radars, environmental conditions including adverse weather, and others. These are described further in Sections 7.6.39 onwards.

7.2.8 The Authorising Engineer (AE(WaH)) with assistance from the Authorised Person (AP(WaH)) is to assess a workplace that is at height before it can be designated as an RHP. The process for designation of a workplace at height as an RHP is detailed in Sections 7.3.9 onwards.

7.2.9 This chapter sets out requirements for a safe system of work for accessing and working at height and a system for control of access to RHPs by the use of Permits to Climb (PtoC) to be issued by APs. It is a means of operating a system to ensure that all MOD establishments have a consistent approach as required by the Management of Health and Safety at Work Regulations.

7.2.10 Where the requirements of this chapter impact on the requirements of other chapters of JSP375 Part 2 Volume 3, the respective APs are to cooperate and coordinate their actions accordingly including the issuing of PtoCs and other safety documentation.

7.2.11 Where it is necessary to depart from any requirement of this chapter, the person seeking the dispensation is to agree such a departure in writing from the Senior Authorising Authority (Working at Height) (SAA(WaH)). A request for a written dispensation, including supporting reasons, is to be made via the AE(WaH).

Limitations

7.2.12 Access or egress by a staircase in a permanent workplace does not constitute working at height and is not covered by this chapter.

7.2.13 Work at height activities on temporary access systems, for example on scaffolding, portable ladders and Mobile Elevated Working Platforms (MEWPs) are to be in accordance with the guidance in JSP 375 Part 2, Volume 1, Chapter 27 ‘Prevention of Falls and Falling Objects’. Accordingly, roof-top sites and any other workplaces at height that are accessible by permanently installed fixed access systems and, subject to risk assessment, are deemed to pose levels of risk such that their accesses do not require to be controlled, are to be managed as per Chapter 27. This Chapter 7 applies to Restricted High Places only.

7.2.14 This chapter does not apply where specialised access techniques, such as rope systems or steeple jacking, are required to gain access to normally inaccessible locations. Where such work is being considered, the requirements of the Industrial
Rope Access Trade Association (IRATA) or the Association of Technical Lightning & Access Specialists (ATLAS) should be followed as appropriate, in addition to the requirements of other applicable regulations and standards.

7.2.15 Confined Space (CS) working is subject to the requirements of JSP375 Part 2 Volume 3 Chapter 6 Safe Working in Confined Spaces. Where a Confined Space is reached via an access that is designated as an RHP, the requirements of this chapter are to apply for access only on to the designated RHP and up to the point of entry into the Confined Space but not beyond. Two separate permits may need to be issued; i.e. one for working at height to access the RHP and one for working in a confined space. The Authorised Person (CS) and the Authorised Person (WaH) are to cooperate and coordinate their actions accordingly.

7.2.16 Notwithstanding the above, entering and working in a Confined Space (CS) may involve working at height. In such circumstances, where working at height is involved within a CS, the requirements of JSP375 Part 2 Volume 3 Chapter 6 Safe Working in Confined Spaces only are to apply.

7.2.17 Electrical, petroleum and mechanical systems installations may be located at a high place and therefore require to be accessed via a fixed access system that is designated as an RHP. A Permit to Climb or a Standing Instruction may therefore be necessary in addition to permits to work on the task activities of other specialisms i.e. electrical, petroleum and mechanical systems. Two or more separate permits may therefore require to be issued. The Authorised Person (WaH) and the APs of other work specialisms are to cooperate and coordinate their actions accordingly.

Roof-top Sites

7.2.18 All roof-top sites accessed by permanently installed fixed access systems are to be recorded in the Register of Workplaces at Height. The register is described further in Sections 7.3.9 onwards. A risk assessment of each roof-top site shall determine if the roof-top is to be designated as a Restricted High Place. Roof-top sites that are not designated as RHPs shall be the subject of JSP 375 Part 2, Volume 1, Chapter 27 ‘Prevention of Falls and Falling Objects’. Guidance on safety in roof-top working is provided in Sections 7.6.56 onwards of this document.

Relocatable Masts

7.2.19 The application of this chapter to relocatable masts is at the discretion of Commanding Officers (COs) or Heads of Establishment (HoEs) as appropriate. In MOD, relocatable masts are generally in use in operational theatres.

7.2.20 Relocatable masts are defined as structures which are not permanently constructed in one location. They do not necessarily form part of the MOD built estate in that the structures are erected on temporary foundations or outriggers so that they could be easily dismantled and transported to other locations. The masts are generally available in smaller units or sections for ease of transportation by military vehicles and trailers usually in customised steel containers. They are assembled and erected on-site and are usually fabricated or manufactured as proprietary products.
7.2.21  For the assembly, erection and dismantlement of relocatable masts there may be a need to work at height. After erection is completed and the mast is operational, there may be a need for personnel to climb the structure for installation, adjustment or removal of mounted equipment. In these situations, the work at height activities are to be subject to the requirements of this chapter with the proviso of paragraph 7.2.19 as above.

7.2.22  Good practice and, where applicable, manufacturer's instructions are to be strictly followed during assembly, erection and dismantlement of the structure. All work is to be supervised, and carried out by competent personnel including inspection and certification after completion of work. See Sections 7.3.19 onwards of this chapter, ‘Design, Appraisal, Inspection and Maintenance - Restricted High Places’. The Practitioner Guides 09/08 and 10/08 on masts and towers referred therein may be followed at the discretion of COs or HoEs.

Military Training and Exercises

7.2.23  Royal Navy, Army, Royal Air Force and Cadet Forces carrying out training, adventurous training and other hazardous military activities involving recruitment, selection and public relations need not comply with the requirements of this chapter. In these circumstances the requirements of JSP 375 Part 2, Volume 1, Chapter 40 ‘Military Training’ shall apply.

7.2.24  Where Military Training and Exercises are to be conducted on an RHP, the Commander responsible for the activity is to liaise with the AP(WaH) to arrange access to the RHP. A PtoC is not required in these instances, where the Commander has a ‘Safe System of Training’ in place. The AP(WaH) is to make available any relevant information concerning the RHP to assist the Commander with preparation of the ‘Safe System of Training’.

Fire Escapes

7.2.25  Fire escapes, for example, staircases, fixed ladders or other similar means of escape wholly dedicated for the purposes of escape during a fire, are not to be included in the Register of Workplaces at Height. They are not governed by this chapter.

7.2.26  Where there is lack of clarity whether a fixed access system is a fire escape or not, or where a fixed access system is also utilised as a fire escape during an emergency, the AE(WaH) is responsible for contacting the establishment’s Fire Safety Officer and agreeing their respective responsibilities in writing.

7.2.27  This chapter does not apply to work at height activities associated with fire training in drill towers, on fire escapes or other structures. However activities other than training of fire personnel, for example, inspection and maintenance work on the tower or structure shall be subject to the requirements of this chapter.
Management Arrangements

General

7.3.1 This section covers the management arrangements required to be put in place for managing safety in relation to work at height activities on Restricted High Places (RHPs). The general principles of the management structure required under this chapter are shown in Figure 7.1.

7.3.2 Other topics covered in this section include the overall policy objectives, the hierarchy of control measures for working at height, designation of a workplace at height as an RHP, design, inspection and maintenance of RHPs, signage, anti-climb devices, locks and keys, audit and reporting of dangerous incidents.

7.3.3 Details of each of the management roles including duties of appointed personnel, suitability criteria, assessment and appointment procedures are set out in Section 7.4.

Policy

7.3.4 Maintenance Management Organisations (MMOs) on the defence estate are, for example, MOD contractors or in-house organisations that are responsible for the provision and maintenance of MOD estate related assets. MMOs may include, Regional Prime Contractors (RPC), Infrastructure Service Providers (ISP), Deputy Commander Royal Engineers (DCRE), DIO or other MOD Agency in-house staff. Implementation of this chapter is the responsibility of the MMO and he is to make the appropriate appointments as required by this chapter.

7.3.5 The MMO is to have in place comprehensive management arrangements for the implementation of this chapter for working at height on RHPs, covering the establishments under its area of responsibility. If a dedicated and customised management plan for implementation of Chapter 7 is not prepared, then the MMO may elect to include relevant information in his overall health and safety policy or strategy for the establishments.

7.3.6 Access to an RHP is to be subject to a safe system of work and is to be limited to Authorised Climbers (ACs) only. A Permit to Climb (PtC) or Standing Instruction (SI) is to be issued to the Person in Charge (PiC) by the AP(WaH) for each RHP.
Figure 7.1 Overview of Management Structure

Note: This figure shows the general principles of the management structure. For further details of the appointment and assessment procedures and processes, refer to JSP375 Part 2 Volume 3 Chapter 2 Common Requirements.
Hierarchical Control Measures for Work at Height

7.3.7 The Work at Height Regulations set out a control hierarchy for the avoidance of risks from work at height. This is as follows:

(a) Avoid work at height;
To ensure that no work is carried out at height if it is safe and reasonably practicable to carry it out other than at height. All new works and, on an opportunity basis, all existing works shall, so far as is reasonably practicable by design, eliminate the need for personnel to work at height e.g. by using lowerable columns or positioning equipment at ground level.

(b) Prevent falls;
The use of an existing safe place of work or means of access is to be made, e.g. an existing place of work with permanent collective passive protection such as handrails. Where this is not reasonably practicable, sufficient work equipment is to be provided, for preventing a fall occurring e.g. by using collective work equipment such as temporary guardrails or mobile elevated working platforms, or by using personal work equipment such as a Work Restraint System (WRS).

(c) Minimise the distance and consequence of a fall;
Where measures taken to prevent a fall do not eliminate the risk of a fall occurring, sufficient work equipment is to be provided, so far as is reasonably practicable, to minimise the distance of a fall, or where it is not reasonably practicable to minimise the distance, the consequence of a fall is to be minimised. Suitable collective work equipment to minimise distance and consequences include nets or airbags positioned close under the work surface or at a lower level. Suitable personal protective equipment includes Fall Arrest Systems (FAS), and suitable personal work equipment includes personal injury systems e.g. a life jacket whilst working next to unguarded water. Additional training and instruction is to be given to workers as necessary.

7.3.8 When selecting work equipment for use during work at height, collective protection measures for example, the use of guard rails, nets, air bags, etc are to take priority over personal protection measures.

Designation of a workplace at height as a Restricted High Place

7.3.9 A flow chart showing the process for designation of a workplace at height as an RHP is provided at Figure 7.2.

7.3.10 The AP(WaH), under the guidance and supervision of the AE(WaH) as appropriate, is to survey, collate and record relevant data of all workplaces at height that are accessible by a fixed access system for the establishments under his area of responsibility. Workplaces that are accessible by temporary means, for example, portable ladders, Mobile Elevated Working Platforms (MEWPs), scaffolding, etc are not to be recorded as they are governed by JSP 375 Part 2 Volume 1 Chapter 27.
7.3.11 A Register of Workplaces at Height is to be compiled as a spreadsheet in electronic or hardcopy format by the AP(WaH). The AE(WaH) is to carry out a risk assessment of each identified workplace at height to determine if the workplace is to be designated as an RHP. The AE(WaH) may be assisted by the AP(WaH) during the risk assessment process however the responsibility for the decision whether to designate a workplace at height as an RHP is to remain with the AE(WaH).

**Figure 7.2 Process to designate a workplace at height as a Restricted High Place**

- **Survey, collate and record all workplaces at height.**
- **Enter data on to a Register of Workplaces at Height (electronic spreadsheet or hardcopy).**
- **Carry out a risk assessment of each workplace at height. Does the workplace pose a risk such that access to it requires to be controlled?**
  - **No**
  - **Yes**
    - **Designate the workplace at height as a Restricted High Place (RHP). Annotate the Register of Workplaces at Height and enter data onto Register of RHPs (Form H1).**
    - **Complete RHP Datasheet (Form H2) and Register of Residual Hazards (Form H3) as applicable.**

* Action by AP(WaH) under the guidance and supervision of AE(WaH)

** Action by AE(WaH) and assisted by AP(WaH) as necessary
7.3.12 The risk assessment of a workplace at height is to consider the following as a minimum:

- the workplace location, type, height and its condition;
- the access system, type and its condition;
- the requirement for competence of climbers;
- provision of edge and fall protection;
- residual and other hazards likely to present a risk to health and safety.

7.3.13 The designated RHP is to be annotated on the Register of Workplaces at Height and entered on to the Register of Restricted High Places (Form H1) for each establishment.

7.3.14 The following forms, included at Annex A as Model Forms, are to be completed where applicable, for each RHP:

- RHP Datasheet (Form H2);
- Register of Residual Hazards (Form H3);
- Serious Fault Notice (Form H8).

7.3.15 All documentation related to the RHP is to be updated after the following:

- Non-Routine Work;
- Condition Inspection or Design Appraisal of masts, towers or other fixed access systems;
- When there is any significant alteration to the RHP, e.g. damage or modifications to the structure, access system or installed equipment.

7.3.16 Records of the risk assessment for designating a workplace at height as an RHP are to be kept by the AP(WaH) at the Document Centre for scrutiny and audit by the SAA(WaH).

7.3.17 The AE(WaH) is to notify the MMO about those workplaces at height that he has not designated as RHPs, in order for the MMO to control risks of falls from height as per JSP 375 Part 2 Volume 1 Chapter 27 or the MMO’s own safe system of work.

Operating Procedures

7.3.18 The operating procedures set out in this chapter are to be followed when issuing a PtoC, preparation of a Task Risk Assessment, Method Statement and Emergency and Rescue Plans. Requirements for other documentation including record keeping are to be followed accordingly. Refer to Section 7.5 for details.

Design, Appraisal, Inspection and Maintenance - Restricted High Places

7.3.19 All Restricted High Places are to be designed, inspected and maintained to current codes, standards and in accordance with applicable manufacturer’s instructions.

7.3.20 All masts and towers on the defence estate are to be designed, inspected and maintained to current codes, standards and in accordance with DIO Practitioner Guides (PGs) 09/08 - Design Appraisal of Masts and Towers, 10/08 – Condition Inspection of Masts and Towers, and 03/10 – Fixed Access Systems.
7.3.21 PG 09/08 mandates policy on the Design and Appraisal of Masts and Towers on the defence estate. The PG sets out requirements for completion, by the MMO, of forms as follows:

- Form R12 - Professional Appraisal Information
- Form R13 - Professional Appraisal Certificate
- Form R14 - Professional Appraisal Check Certificate.

7.3.22 PG 10/08 mandates policy on the Condition Inspection of Masts and Towers on the defence estate. It sets out requirements for completion, by the MMO, of forms as follows:

- Form R8 - Condition Inspection Certificate
- Form R9 - Condition Inspection Summary Report.

7.3.23 PG 03/10 provides guidance for the selection and design of fixed access systems on the defence estate.

7.3.24 The RHP Datasheet (Form H2) is to indicate whether an RHP is a mast, tower or other facility with a fixed access system. Where the RHP is identified as a mast or tower the provisions contained within PGs 09/08 and 10/08 are to be followed and the MMO is to make available to the AE(WaH) and AP(WaH) the respective Forms R8, R9, R12, R13 and R14. The RHP Datasheet is to state the location of the completed ‘R Forms’.

7.3.25 Where an RHP is identified as a facility with a fixed access system other than a mast or tower, the RHP including its access system and equipment as applicable are to be inspected by a competent person to be engaged by the MMO and in accordance with the MMO’s management plan. The management plan is to state the MMO’s policy, strategy and programme for design, appraisal and condition inspection of those RHPs other than a mast or tower. Appropriate records of inspections are to be kept and updated at regular intervals, e.g. a LOLER Thorough Examination Report, Form R104 for World War II Hangars as per TB 02/04, etc.

7.3.26 Pre-use inspections of RHP access systems are to be carried out prior to each climbing activity, but they are not to be deemed as a substitute for scheduled inspections and appraisals.

7.3.27 Design, appraisal, inspection and maintenance documentation is to be made available by the MMO, as necessary, for the preparation of Task Risk Assessments and updating of the Document Register.

7.3.28 When planning core works, core services or minor new works under the Construction Design and Management Regulations (CDM), the CAE is to be notified by the DIO Project Manager or the MMO as appropriate in accordance with JSP375 Part 2 Volume 3 Chapter 2 Common Requirements.

7.3.29 In order to meet the requirements of CDM, the AE(WaH) is to be consulted to ensure due cognisance is taken of potential hazards that may be introduced during the design process. This is to ensure, so far as is practicable, hazards are not designed and built into new construction works, to reduce the need for additional safe systems of work. It should therefore be noted that permission for access to a workplace at height during the new work may not necessarily have been granted
under the requirements of this chapter but a MEWP, crane or some other means may have been utilised instead. Alternatively, work may have been carried out on an RHP without the need to work at height. The work may have covered, for example, adding, removing or replacing aerials, dishes and other communications equipment, part or full demolition or dismantlement of a structure, etc.

**Signage**

7.3.30 Appropriate permanent advisory and warning signs are to be placed on or in close proximity to the access point of each RHP. Where an RHP is individually fenced and the fence is in close proximity to the RHP, the signs may be fixed to the fence. On large aerial farms, for example, where a single fence may enclose many RHPs, signs are to be fixed on each RHP. An example of a Model Sign is provided in Annex B.

7.3.31 The AP(WaH) is to liaise with any other party that has control over residual hazards on or in the vicinity of each RHP, and is to verify that full and sufficient signage is in place at each RHP location.

7.3.32 During a work at height activity, where there is a risk of falling objects, a site perimeter is to be established and temporary warning notices and signs are to be positioned as appropriate. A site perimeter is to be set at a radius equal to half the maximum working height up to a limiting radius of 25 metres.

**Anti-Climb Devices, Locks and Keys**

7.3.33 The AE(WaH) is to advise the MMO to implement appropriate preventative control measures, where deemed necessary, in order to constrain unauthorised access to RHPs. This may be achieved, for example, by fitting anti-climb devices (ACD) such as plates with padlocks on ladders, or installing perimeter fencing.

7.3.34 Details of all keys relating to RHPs are to be included in the Document Register. The AP(WaH) is to hold and issue keys for lockable ACDs installed on RHPs within his area of appointment.

7.3.35 The issuing of a PtoC may necessitate, for example, the isolation of equipment involving a separate Permit to Work and control of keys. Where this situation arises for an RHP, the AP(WaH), APs of other specialisms and any other person authorised to issue a Permit to Work are to cooperate and coordinate their actions accordingly. The AE(WaH) is to agree suitable procedures for coordination with APs of other specialisms and incorporate them into the MMO’s management plan for working at height on RHPs.

7.3.36 For further details on procedures for locks and keys, refer to JSP375 Part 2 Volume 3 Chapter 2 Common Requirements.

**Audit**

7.3.37 Application of this chapter will be subject to periodic assessment of personnel and audit and monitoring for compliance with this chapter in accordance with JSP375 Part 2 Volume 3 Chapter 2 Common Requirements.
Reporting of Dangerous Incidents, Dangerous Conditions, Dangerous Practices, Dangerous Occurrences, Injuries and Diseases

7.3.38 For details on the reporting of Dangerous Incidents, Dangerous Conditions, Dangerous Practices, Dangerous Occurrences, Injuries and Diseases refer to JSP375 Part 2 Volume 3 Chapter 2 Common Requirements.

Roles, Duties, Assessment and Appointment of Personnel

General

7.4.1 This section details the roles, duties, suitability criteria, assessment, appointment and training requirements for the personnel appointed to management roles. It sets out requirements that are supplementary to JSP375 Part 2 Vol. 3 Chapter 2 Common Requirements, with which it is to be read in conjunction.

7.4.2 The management appointees are to have adequate authority and resources to ensure that requirements of this chapter are complied with.

Authorising Engineer (WaH)

7.4.3 The role of the AE(WaH) is to implement working at height policy for RHPs at establishment level, and to monitor and audit the application of this chapter.

7.4.4 Duties of an AE are detailed in JSP375 Part 2 Volume 3 Chapter 2 Common Requirements. The AE(WaH) is to undertake additional duties as follows:

(a) to assist with the development and update of the MMO’s management plan or arrangements for controlling working at height on RHPs;
(b) to oversee and take responsibility for carrying out assessments of all workplaces at height on the establishments;
(c) to ensure that the Register of RHPs is prepared and maintained;
(d) to advise on the need and suitability of fixed access systems;
(e) to ensure that the planned appraisals, inspections and maintenance documentation is available for each RHP;
(f) to review and approve Non-Routine Working;
(g) to review and approve Standing Instructions;
(h) to provide advice with regard to the CDM Regulations and requirements for the Health and Safety Plans in respect of RHPs;
(i) to ensure Handover Documentation, in respect of each RHP, is satisfactory.

7.4.5 As a guide, suitability criteria of an AE are detailed in JSP375 Part 2 Volume 3 Chapter 2 Common Requirements. The AE(WaH) is to meet specific criteria as follows:

(a) as a minimum, hold an HNC/HND qualification, or equivalent, in a relevant engineering subject (i.e. civil or structural engineering);
(b) have relevant technical experience;
(c) be familiar with the different types of structures, installations and access systems in use on the defence estate;
(d) be competent in the preparation of risk assessments for working at height;
(e) be competent in conducting assessments of personnel;
(f) be competent in conducting audits;
(g) maintain knowledge of current climbing practices, climbing equipment and WaH PPE by undergoing suitable training.

7.4.6 Assessment and appointment of an AE(WaH) is to be undertaken in accordance with JSP375 Part 2 Volume 3 Chapter 2 Common Requirements.

**Authorised Person (WaH)**

7.4.7 The role of the AP(WaH) is to manage and control access to each RHP. The AP(WaH) is to be a single named appointee for all RHPs on a site, establishment or within a defined area and is to be responsible for the issue of PtoCs and for the management of the PtoC system.

7.4.8 Where 24 hour availability of access is essential due to user or other operational requirements, a system of ‘duty’ AP(WaH) may need to be operated. The relevant RHP may therefore have more than one AP(WaH) appointed, however there is to be only one ‘duty’ AP(WaH) for that RHP at any one time.

7.4.9 Duties of an AP are detailed in JSP375 Part 2 Volume 3 Chapter 2 Common Requirements. The AP(WaH) is to undertake specific duties, in relation to this chapter as follows:

(a) to survey, collate and record data of all workplaces at height and to prepare and maintain the Register of RHPs;
(b) to assist the AE(WaH) in the risk assessment of all workplaces at height on the establishment in order to determine if they are to be designated as RHPs;
(c) to review all requests for access to an RHP and to issue a PtoC;
(d) to notify the AE(WaH) of any requests for Non-Routine Working and to keep him informed of progress on site during the work at height activity;
(e) to arrange safe access for the Climbing Team;
(f) to monitor that the Climbing Team comply with requirements of this chapter and, if not, to take appropriate action;
(g) to undertake random checks of the Climbing Team to establish that the provision and use of the PPE and the work being carried out is in accordance with the Method Statement;
(h) to inform the AE(WaH) of any Serious Fault Notices (Form H8) and other feedback as received from the Climbing Team;
(i) to maintain and keep up to date the Document Register;
(j) to cooperate and coordinate with APs of other specialisms.
7.4.10 As a guide, suitability criteria of an AP are detailed in JSP375 Part 2 Volume 3 Chapter 2 Common Requirements. The AP(WaH) is to meet specific criteria as follows:

(a) be familiar with each RHP for which he is appointed;
(b) be familiar with the establishment and its user requirements in respect to RHPs;
(c) have awareness of current climbing practices, climbing equipment and WaH PPE.

7.4.11 Assessment and appointment of an AP is to be undertaken in accordance with JSP375 Part 2 Volume 3 Chapter 2 Common Requirements.

Coordinating Authorised Person (WaH)

7.4.12 The role, duties and appointment procedure for a Coordinating Authorised Person (WaH) (CAP(WaH)), as appointed within the area of his discipline, is detailed in JSP375 Part 2 Volume 3 Chapter 2 Common Requirements.

Coordinating Authorising Engineer

7.4.13 The role, duties and appointment procedure for a Coordinating Authorising Engineer (CAE) is detailed in JSP375 Part 2 Volume 3 Chapter 2 Common Requirements.

Senior Authorising Authority (WaH)

7.4.14 The role of the of the SAA(WaH) is to act as the focal point for this chapter and carry out his duties as detailed in JSP375 Part 2 Volume 3 Chapter 2 Common Requirements.

7.4.15 As a guide suitability criteria of a SAA are detailed in JSP375 Part 2 Volume 3 Chapter 2 Common Requirements. The SAA(WaH) is to meet specific criteria as follows:

(a) be a Chartered Civil or Structural Engineer;
(b) have considerable relevant professional experience (normally in excess of 7 years);
(c) maintain awareness of working at height best practice in the wider industry;
(d) have knowledge of the different types of structures, installations and facilities in use on the defence estate;
(e) have knowledge of current climbing practices, climbing equipment and WaH PPE;
(f) be competent in the preparation of risk assessments for working at height;
(g) maintain awareness of and currency in new developments in health and safety legislation in relation to working at height.

7.4.16 Assessment and appointment of the SAA(WaH) is to be undertaken in accordance with JSP375 Part 2 Volume 3 Chapter 2 Common Requirements.
Tuition, Training and Site Familiarity

7.4.17 Tuition, training and site familiarity of personnel appointed for the management roles as per this chapter are to be undertaken in accordance with JSP375 Part 2 Volume 3 Chapter 2 Common Requirements.

7.4.18 Personnel appointed as AE(WaH), CAP(WaH) and AP(WaH) are to undergo the discipline specific training provided by a DIO approved Training Provider, as detailed in JSP375 Part 2 Volume 3 Chapter 2 Common Requirements.

Operating Procedures

General

7.5.1 This section details the operating procedures to be adopted for managing the control of access to Restricted High Places (RHPs). It covers Task Risk Assessments, Method Statements, Emergency and Rescue Plans, Permits to Climb (PtoCs), Standing Instructions (SIs), and the Documentation Arrangements.

7.5.2 Access to an RHP requires the issue of a PtoC, unless access is permitted under a Standing Instruction or the provisions of Military Training and Exercises. The PtoC system operates two categories of permits, one for Routine Work and one for Non-Routine Work. A PtoC may also need to be issued in conjunction with other Permit to Work systems e.g. confined spaces, electrical, petroleum or mechanical systems.

7.5.3 Routine Work and Non-Routine Work is explained in the following sub-sections with examples. An RHP is often subjected to changes in loadings due to change or replacement of mounted equipment, or when additional equipment is installed on the RHP. A nominal weight of 8kg is to be used when considering 'change control' and for categorising Routine Work or Non-Routine Work.

Routine Work

7.5.4 Routine Work includes tasks on an RHP which have been assessed by the AE(WaH) and listed on the RHP Datasheet (Form H2) for each RHP.

7.5.5 As a guide, the following tasks are considered Routine Work:

- a survey for change of use;
- an inspection, measurement or non-destructive test (NDT) survey;
- minor work to feeders;
- minor repairs of antennas;
- like-for-like replacement of installed equipment (less than 8kg) except tasks where lifting equipment is to be used;
- replacement of lamps.

7.5.6 All Routine Work requires a PtoC to be issued by the appropriate AP(WaH) and without further reference to the AE(WaH).
Non-Routine Work

7.5.7 All Non-Routine Work is to be referred to the AE(WaH).

7.5.8 As a guide the following tasks are considered Non-Routine Work:

- tasks which will modify the structure and/or access system;
- installation, removal or replacement of equipment (i.e. not like-for-like);
- where live working is being considered e.g. electricity and RF hazards;
- tasks where repairs to catenary type antenna require lowering of complete antenna system thus affecting mast verticality and guy tensions;
- tasks where single items greater than 8kg have to be moved, carried or lifted;
- tasks where lifting equipment is to be used whether attached to the structure or not;
- tasks where tools other than small hand tools are to be used;
- tasks which require the issue of permits to work under other specialisms;

7.5.9 When it is not clear if the task is Non-Routine Work, the AP(WaH) is to refer it to the AE(WaH) for a decision.

Task Risk Assessment and Method Statement

7.5.10 For all Routine Work and Non-Routine Work to be undertaken on an RHP, a Task Risk Assessment is to be prepared by or under the supervision of the Person in Charge (PiC).

7.5.11 The Task Risk Assessment is to take into consideration details given on the RHP Datasheet (Form H2), Residual Hazards (Form H3) and Condition Inspection Certificate (Form R8 or similar) which are to be made available to the PiC. Additional hazards present at the time of the work at height activity are also to be considered. Guidance on potential hazards in relation to working at height is provided in Sections 7.6.39 onwards.

7.5.12 In preparing the Task Risk Assessment, each risk is to be assessed taking into consideration the mitigation and control measures to be applied as far as reasonably practicable. Any residual risk is to be clearly identified and full details of how the work will proceed safely are to be provided in the Method Statement.

7.5.13 The Method Statement is to include the sequence of work and details of the WaH Personal Protective Equipment (PPE) to be worn by each member of the Climbing Team during the work at height activity.

7.5.14 The Method Statement is also to include details of site boundaries, methods of cordoning-off suitable areas around the RHP, and any temporary signage that may be required.

7.5.15 The PiC and members of the Climbing Team are to remain vigilant and are to continually review the Task Risk Assessment during the work at height activity. They are to take account of any changes, for example, environmental conditions, and implement further control measures as necessary. Any changes made to the Task Risk Assessment, control measures and Method Statement are to be subsequently recorded.
Emergency and Rescue Plans

7.5.16 For any work at height activity on an RHP, the PiC is to prepare a suitable and sufficient Emergency Plan for dealing with emergencies. The plan is to include names and telephone numbers of all emergency and support services that may need to be contacted.

7.5.17 A Rescue Plan is to be prepared by the PiC as part of the planning for a work at height activity. The Rescue Plan is to be effective, considering the task and location, in order for the rescue to be carried out promptly. The rescue method selected shall be proportionate to the risk and is not to rely on the emergency services unless specific prior arrangements are made with them.

7.5.18 A Rescue Plan is to include the following details:

- method of rescue
- personnel to be engaged for the rescue operation
- rescue equipment
- means of communication
- first aid arrangements

7.5.19 In the event of a fall, personnel carrying out the rescue are to be competent to carry out the procedures for rescue from height by using the equipment deployed. Equipment required for the selected rescue method and location of equipment is to be detailed in the plan. All members in a Climbing Team are to be able to communicate with each other including the rescue personnel. All means of communication are to be proven effective.

7.5.20 The outcome of a risk assessment including preparation of the Emergency and Rescue Plans may determine the requirement for a member of the Climbing Team to remain on the ground in addition to those required for the actual climbing task. This person is not required to be an Authorised Climber. Where the task is such that only one climber is required on a structure and the second climber is to remain on the ground to provide rescue, then he is to be fully equipped with a full body harness and other appropriate WaH Personal Protective Equipment (WaH PPE) ready to climb should there be an emergency.

7.5.21 During a rescue from height, single rope working is only to be permitted where life is endangered and it is considered essential following a dynamic risk assessment.

7.5.22 When a work at height activity is carried out at a remote site, it is essential that the Climbing Team has suitable and sufficient Emergency and Rescue Plans in place taking into consideration the remote nature and location of the site. Plans are to include details of the means of communication that shall be proven to be effective. Appropriate rescue equipment is to be available, suitable for the location, height and type of work to be carried out.
Permit to Climb

7.5.23 A Permit to Climb (PtoC) is to be issued by the AP(WaH) to the PiC in order to allow the Climbing Team access to an RHP. A flow chart showing the process is included in Error! Reference source not found.. A PtoC (Form H6) is included at Annex A. Each PtoC is to have a unique serial number. Under some circumstances a Standing Instruction (SI) may be issued in lieu of a PtoC, see Sections 7.5.34 onwards.

7.5.24 The AP(WaH) is to issue a PtoC only after all aspects of the need to work at height and safe access have been considered and proven necessary. The Climbing Team proposing to undertake the work is to satisfy the AP(WaH) that they have met the requirements as set out in this chapter.

7.5.25 The AP(WaH) is to check the climber status of each member of the Climbing Team. For Skilled Climbers, the AP(WaH) is to inspect their logbooks in order to check their competencies for working at height. He will not however check the competencies for carrying out task specific activities of other work specialisms, for example, electricity, confined spaces, pressure systems, etc. The Climbing Team’s competencies for other work specialisms are to be checked by the respective APs of these specialisms, or the MMO as appropriate.

7.5.26 The AP(WaH) is to also check evidence of medical examination of each Skilled Climber.

7.5.27 For Routine Work the AP(WaH) is to ensure that a suitable and sufficient Task Risk Assessment, Method Statement, and Emergency and Rescue Plans are in place prior to the issue of a PtoC.

7.5.28 A PtoC for Routine Work is to be issued to the PiC by the AP(WaH) when he is satisfied that the request for access to an RHP has proposed a safe system of work for the task. If the AP(WaH) deems the task to be Non-Routine the request for access is to be referred by him to the AE(WaH) for approval.

7.5.29 For Non-Routine Work the AE(WaH) is to ensure that a suitable and sufficient Task Risk Assessment, Method Statement and Emergency and Rescue Plans are in place. Sufficient time is to be allowed for the AE(WaH) to appraise all documentation. A PtoC for Non-Routine Work is only to be issued to the PiC by the AP(WaH) following approval of the Non-Routine Work by the AE(WaH) and completion by the AE(WaH) of part 2 of the PtoC.

7.5.30 A PtoC is to be issued at the location of the RHP. For each RHP, there is to be only one valid PtoC issued and open at any one time. The AP(WaH) is to close the PtoC on completion of the task, and receive any feedback from the Climbing Team. Any Standing Instruction in place is to be temporarily suspended for the period a PtoC is issued for the RHP.

7.5.31 A PtoC, in most circumstances, is only to be valid for the date it is issued. In the event that the duration of a work at height task takes longer than one day, the AP(WaH) may, subject to risk assessment, consider a request for the PtoC to remain open for a longer period up to a maximum of 5 days. This is dependent upon the specific WaH activity and upon the PiC confirming on a daily basis that members of the Climbing Team are fit to undertake the task, and that the task risk assessment and method statement remain suitable and sufficient.
Figure 7.3  Permit to Climb Process
7.5.32 A PtoC for an RHP may require to be issued in conjunction with other Permit to Work systems, e.g. electricity, confined spaces, pressure systems etc. In this situation, the AP(WaH) and APs of other work specialisms are to cooperate and coordinate their actions accordingly for the issue of safety documentation as per the relevant safety rules and procedures and agree suitable arrangements for the control of keys.

7.5.33 An AP(WaH) shall not issue a PtoC to a Climbing Team which includes him either as a member of the team or the PiC.

Standing Instruction

7.5.34 Where a WaH task is of a routine and frequent nature, a Standing Instruction (SI) may be issued to the Person in Charge by the Authorised Person (WaH) instead of a PtoC. The SI is to be approved and signed by the Authorising Engineer (WaH) and issued on Form H10.

7.5.35 The AP(WaH) is to conduct a suitable and sufficient assessment of the risks for consideration of an SI instead of a PtoC system. The AP(WaH) shall issue an SI subject to approval by the AE(WaH).

7.5.36 The AP(WaH) is to provide the following documents where applicable to the PiC for consideration of his safe system of work documentation in support of an SI:

- Form H2 - Datasheet
- Form H3 - Register of Residual Hazards
- Form H8 - Serious Fault Notice
- Form R8 - Condition Inspection Certificate or latest inspection report for an RHP other than a mast or tower.

7.5.37 The PiC is to submit the following documents to the AP(WaH):

- Task Risk Assessment
- Method Statement
- Emergency and Rescue Plans

7.5.38 The above documents may be of a generic nature for the type of WaH activity being undertaken under the SI. The generic documents are to be reviewed by the PiC and updated to task specific ones as applicable on each occasion the SI is invoked.

7.5.39 The PiC or his employer is to provide details of the climbers to the AP(WaH). The SI is valid for the named climbers only within the Climbing Team. The climbers are to be trained and competent as per the requirements of this chapter.

7.5.40 The PiC is to confirm that members of the Climbing Team have undergone the relevant medical examination and that they are fit to undertake the task. He is also to check the weather forecast prior to each WaH activity. The PiC is to immediately inform the AP(WaH) of any changes to the agreed plan of work, change of personnel or any other circumstances that would affect the safety of the Climbing Team or increase the level of risk originally assessed.

7.5.41 The SI is to be valid for a period not exceeding 12 months.
7.5.42 Keys for access to the Restricted High Place (RHP) during the validity of the SI are to remain under the control of the AP(WaH). The AP(WaH) is to make suitable arrangements for the issue of keys during call-outs and access requirements outside normal working hours.

7.5.43 During the validity period of the SI, a WaH task on the RHP other than that under the SI may be required to be carried out. Under such circumstances, the SI is to be temporarily suspended and the PiC is to stop any future work on the RHP that was authorised under the SI. When the planned work under a separate PtoC has been completed and the PtoC has been returned to the AP(WaH) for closure, the SI that was under temporary suspension may be re-activated.

7.5.44 An SI may be cancelled by the AP(WaH) under the following circumstances:

- change of named climber or climbers
- change of WaH task
- new hazards are present and/or the risk rating has increased to unacceptable levels
- infringement of the terms of the SI
- actions of climbers that compromise their safety or that of others.

7.5.45 Form H10 should be completed to indicate whether those members of the Climbing Team who may perform the PiC role for the task that is the subject of the SI. Should more than one potential PiC be included in the Climbing Team, only one of them shall undertake the PiC role for the task being carried out. Following each climbing activity a copy of page 2 of the SI should be dated and marked up indicating the composition of the team including the PiC and retained for audit purposes.

**Documentation Arrangements**

7.5.46 A Document Centre for each establishment is to be kept and maintained by the AP(WaH) for his area of responsibility, under the AE(WaH)’s guidance and supervision. The Document Centre may cover several establishments, sites, locations or geographical areas. Each Document Centre is to have a Document Cabinet for the safe keeping of documents relevant to implementation of this chapter. The AE(WaH) may elect to use electronic records provided this method is more efficient and effective.

7.5.47 A Document Cabinet is to contain the following documents:

(a) The Document Register;
(b) Stocks of stationery including H Forms as necessary;
(c) Reference documentation (see Annex D for guidance).

7.5.48 The Document Cabinet is to be a lockable drawer, cabinet or series of cabinets which are to be kept locked when unattended. Access to the Document Cabinet is to be under the control of AP(WaH)s.
7.5.49 The Document Register is to include as a minimum:

(a) Index;
(b) The Operating Record;
(c) A site plan or geographical footprint showing locations of each RHP and the AP(WaH)'s areas of responsibility;
(d) Register of Workplaces at Height including risk assessments for their designation as RHPs;
(e) Register of Restricted High Places (Form H1);
(f) Register of Permits to Climb (Form H7);
(g) Written agreements on lines of responsibilities with others, e.g. with Fire Safety Officer;
(h) General correspondence file;
(i) Appointment letters of AE(WaH)s and AP(WaH)s;
(j) Register of Authorised Climbers (optional);
(k) Key List and Key Issue Register;
(l) Contact details for Emergency Services and RHP equipment users;
(m) Copies of Audit Reports;

and for each RHP:

(n) RHP Datasheet (Form H2);
(o) Register of Residual Hazards (Form H3);
(p) Copies of issued Permits to Climb (Form H6);
(q) Register of issued Permits to Climb/Standing Instructions (Form H7);
(r) Copies of Serious Fault Notices (Form H8);
(s) Copies of issued Standing Instructions (Form H10);
(t) Condition Inspection Certificate (Form R8), where applicable;
(u) Professional Appraisal Certificates (Forms R12, R13 & R14), if applicable;
(v) Inspection and appraisal reports of RHPs other than masts and towers;
(w) any other information deemed relevant or necessary.

7.5.50 Where documentation is held elsewhere, the location of the respective document is to be noted in the relevant section of the Document Register.

7.5.51 An Operating Record (OR) is to be kept for each area of responsibility for which an AP(WaH) is appointed. The Operating Record may be in a bound book or kept electronically, and is to be clearly marked to indicate the sites, locations, establishments and geographic regions to which the records relate.

7.5.52 The pages of the Operating Record book are to be divided into columns with the following headings as a minimum:

- Time and Date;
- Location and reference of RHP;
- Details of event or operation and reason;
- Name and signature.
Examples of events or operations to be included are:

- Issue and cancellation of each PtoC or SI;
- The loss of a PtoC or SI;
- Withdrawal or cancellation of a PtoC or SI;
- Change in condition of an RHP;
- Handover of duties from one AP(WaH) to another;
- Details of any dangerous occurrence in respect of WaH on an RHP;
- Inclusion or removal of an RHP from the Register of RHPs;
- Any other points to be noted for ensuring safety of personnel during future work.

Only one Operating Record is to be kept for each site, location or geographical area, as determined by the AE(WaH). The OR is to be kept and retained in the Document Cabinet for a period of 6 years after the date of last entry.

Climbing Teams and Authorised Climbers

General

This section provides details on Climbing Teams, the Person in Charge (PiC) and Authorised Climbers (ACs). It defines the required competencies of the two categories of ACs; Occasional and Skilled. It describes the composition of a Climbing Team and the responsibilities of the PiC and members of the Climbing Team. The requirements for medical examination, fitness to climb, climber skills, training, logbooks and a register for Authorised Climbers are also given. Additionally, guidance is provided on potential hazards, personal protective equipment and roof-top working.

This chapter does not refer to the appointment of ‘Skilled Persons’ as defined by JSP375 Part 2 Volume 3 Chapter 2 Common Requirements. Instead, all work at height activities on RHPs are to be carried out by ACs upon issue of a PtoC or SI by an AP(WaH). See Sections 7.6.30 onwards.

Climbing Team

Guidance for selection of Authorised Climbers to enable suitable composition of the Climbing Team to perform the work at height activity and plan for emergencies and rescue is provided in Figure 7.4.

The Climbing Team is to be composed of adequate numbers of trained and competent personnel for the work at height activity on the RHP in accordance with the requirements of this chapter.

In order to avoid ‘lone working’, the Climbing Team is to comprise a minimum of two ACs. If the Emergency and Rescue Plans specify the utilisation of the Climbing Team’s personnel to perform a rescue then at least two of the climbers are to be of skilled climber categories. This is to allow one skilled climber to rescue the other and vice versa. The Climbing Team is to have effective and proven means of communication between members of the team at all times.
7.6.6 The Climbing Team is to have all appropriate equipment and WaH PPE to undertake the work at height activity safely, and it is to be used in accordance with the Method Statement.

**Person in Charge**

7.6.7 For each work at height activity, a suitably trained and competent person in the Climbing Team is to be nominated as the Person in Charge (PiC) by his employing organisation. The PiC is to be an Authorised Climber. He has overall responsibility with regard to safety and climbing matters in relation to the commencement or continuation of the work at height activity. The PiC is to be the most suitable person to assume responsibility and need not necessarily be the person of the highest rank or grade within the Climbing Team.

7.6.8 Prior to any climbing on an RHP, the PiC is to request a PtoC from the respective AP(WaH) or ensure that an SI is in place to cover the proposed task. The AP(WaH) will not issue a PtoC or SI until all hazards have been considered and the associated risks have been assessed and the control measures have been planned and recorded in the Task Risk Assessment. It is the responsibility of the PiC to ensure that the Task Risk Assessment, Method Statement, Emergency and Rescue Plans are prepared and that they are followed and reviewed as necessary.

7.6.9 The PiC is to ensure that each member of the Climbing Team operates in a safe manner and understands his individual responsibility. He is also to ensure that each climber is operating within his own capability and is willing to undertake the task. Where a climber demonstrates a lack of fitness or confidence in carrying out a task, the PiC is not to compel the climber to carry it out.

7.6.10 In a situation that the PiC considers to be unsafe, all climbing operations are to immediately cease and he is to notify the AP(WaH) accordingly. No work at height activity is to be resumed until the AP(WaH) and the PiC have agreed to do so in writing by annotating the PtoC or issuing a new PtoC.

7.6.11 When a serious fault in respect of safety is identified by any member of the Climbing Team, the PiC is to notify the AP(WaH) as soon as practicable and complete a Serious Fault Notice (Form H8). The AP(WaH) is to, in turn, inform the AE(WaH) and copy the Serious Fault Notice (Form H8) to the AE(WaH). The PiC and the AP(WaH) are to take appropriate and immediate action to rectify the serious fault. All accesses to the RHP are to be made secure and further climbing is to be prohibited.

7.6.12 On completion or stoppage of the work at height activity, the PiC is to provide feedback on the PtoC form. The PiC is to confirm that the work has been completed or stopped and that the structure and access system have been left in a safe condition and the site secured. The PiC is to return the PtoC to the AP(WaH) for closure or cancellation.

7.6.13 If climbing becomes necessary in order to rectify the serious fault, then a new request for a PtoC shall be made. The Task Risk Assessment, Method Statement and the Emergency and Rescue Plans are to be prepared taking into consideration the serious fault identified by the preceding Climbing Team. Using an alternative access route on to the RHP, deploying alternative climbing techniques and engaging higher skilled and more experienced climbers may be considered in order to mitigate and control risk.
7.6.14 The role of a Person in Charge shall not be undertaken by an Authorised Person (WaH) whilst he is working in the capacity of a duty AP(WaH).

Figure 7.4 Guidance for Selecting Authorised Climbers

Notes:
1. An Occasional Climber is not permitted to climb higher than 12m unless a risk assessment by the AE(WaH) determines that he may climb to a new higher limit.
2. The decision to permit an Occasional Climber to wear PPE and be attached to the fixed access system is subject to risk assessment by the Person in Charge.
Authorised Climbers

7.6.15 Only Authorised Climbers (ACs) are permitted to access an RHP on the defence estate under a PtoC or SI. The two categories of ACs are:

- Occasional Climber;
- Skilled Climber.

7.6.16 The competencies and climbing restrictions for each of the AC categories are set out in Figure 7.5. It is the responsibility of the employing organisation to maintain the competencies of its ACs.

7.6.17 The Occasional Climber may be engaged for Routine Work or Non-Routine Work on RHPs incorporating platforms at 6m maximum spacing. The height of climb that he is permitted shall be determined by the AE(WaH) and limited to 12 metres unless a risk assessment by the AE(WaH) determines a higher limit.

7.6.18 The Occasional Climber may be required to wear a full body harness subject to risk assessment being carried out by the PiC, taking into consideration the hazards and the particular task he is to be engaged on.

7.6.19 The Skilled Climber may be engaged for Routine Work or Non-Routine Work activities on RHPs. There is no absolute height limitation set for a Skilled Climber. It is the responsibility of his employer to ensure that the skills required for a task match the individual's competence and for the individual climber to demonstrate this by appropriate records in his Logbook.

7.6.20 The Skilled Climber is permitted to operate anywhere on an RHP dependant upon the task to be undertaken, provided that he is protected by a permanent (e.g. rigid rail or wire) or temporary (e.g. double lanyard) fall arrest system at all times.

7.6.21 Working at Height PPE is manufactured and tested against standards that govern the maximum All Up Mass (AUM) of a person that can safely use that equipment. Current standards detail tests at 100kg, although many manufacturers produce tested and certified equipment rated to 130kg and above. The AUM is the total sum of the climber's body weight plus any other attached tools, equipment and clothing. The maximum force during the braking period of an energy absorber in PPE must not exceed 6.0 kN. The PiC is to ensure that all members of the Climbing Team are issued with the appropriate PPE and that the AUM for the climber does not exceed the stated AUM for any items of PPE in use.

7.6.22 When climbing directly on a structure, climbers are to select the strongest anchor point available. The selected anchor point is to be as high as practically possible and preferably above head height. Reference to the latest inspection or appraisal report of the RHP is to be made as necessary.

7.6.23 Prior to climbing an RHP, the PiC is to undertake a visual inspection of the structure and access system from the ground. All ACs are to maintain visual inspection of the structure and access system throughout the work at height activity. The inspection does not need to be recorded, but any unacceptable conditions found are to be reported to the AP(WaH).
### Authorised Climber Category

<table>
<thead>
<tr>
<th></th>
<th>Occasional</th>
<th>Skilled</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Training</strong></td>
<td>Awareness only, to be arranged by Employer (see 6.5.2).</td>
<td>Formal (see 6.5.3).</td>
</tr>
<tr>
<td><strong>WaH Experience</strong></td>
<td>Employer assessed.</td>
<td>Demonstrated in Logbook.</td>
</tr>
<tr>
<td><strong>Additional Skills</strong></td>
<td>Roof-top Working</td>
<td>Roof-top Working</td>
</tr>
<tr>
<td></td>
<td>RF Awareness</td>
<td>RF Monitoring</td>
</tr>
<tr>
<td></td>
<td>Full body harness and associated WaH PPE</td>
<td>Rescue from Height</td>
</tr>
<tr>
<td></td>
<td></td>
<td>First Aid at Height</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Lifting Systems</td>
</tr>
<tr>
<td><strong>Medical Examination</strong></td>
<td>Not required.</td>
<td>Certified by Medical Practitioner.</td>
</tr>
<tr>
<td><strong>Fitness</strong></td>
<td>To be confirmed by PiC.</td>
<td>To be confirmed by PiC.</td>
</tr>
<tr>
<td><strong>Climbing / Height Limitation</strong></td>
<td>RHPs incorporating platforms at 6m max spacing. Maximum height from ground level* to be determined by AE(WaH) and limited to 12m unless a risk assessment by the AE(WaH) determines a higher limit.</td>
<td>Limited by experience / risk assessment.</td>
</tr>
</tbody>
</table>

*The ground level as a benchmark is based on the assumption that the surrounding ground area is flat and clear from any obstruction or other hazards.

### Figure 7.5 Guidance on Authorised Climber Competencies

**Training of Authorised Climbers**

7.6.24 Authorised Climbers are to have received adequate and appropriate training in order to carry out work at height. Skilled Climbers are to be able to demonstrate this by presenting training records in their Logbooks.

7.6.25 It is not mandatory for Occasional Climbers to undergo formal work at height training however his employer is to ensure that awareness training appropriate to the task being undertaken is provided. Occasional Climbers are to receive awareness training to include as a minimum, ladder safety, ladder climbing techniques, relevant health and safety legislation, potential hazards, risk assessment and planning for emergencies. If deemed necessary, the training is also to include roof-top working, RF awareness and wearing of a full body harness associated with WaH PPE.
7.6.26 All Skilled Climbers are to receive formal work at height training. The training is to cover as a minimum, relevant health and safety legislation, aptitude for working at height, climbing and access techniques, selection and use of work equipment and WaH PPE, inspection of work equipment and WaH PPE, potential hazards, preparation of risk assessments, planning for emergencies and rescues, record keeping and maintaining a Logbook. A Skilled Climber may enhance his skills and qualifications in specialist areas by additional endorsements, for example, RF monitoring, rescue techniques, first aid at height, positioning temporary anchorage points or systems, use of lifting systems, specialist suspension techniques, etc.

7.6.27 When a period of 12 months or longer has lapsed since the last recorded climb in the AC’s Logbook, the climber’s employing organisation is to arrange for the climber to undergo appropriate supervised work at height refresher training. When a period of 3 years or longer has lapsed, or there are changes in the health and safety legislation that deem it necessary, the Skilled Climber is to undergo formal re-training in working at height.

Authorised Climber’s Logbook

7.6.28 Skilled Climbers are to keep and maintain Logbooks to demonstrate their acquired levels of competence in order to work at height on RHPs. It is optional for Occasional Climbers to keep Logbooks.

7.6.29 The following details are to be included in the Logbook as appropriate:

- A climbing log (indicating e.g. weather conditions, type of structure, details of fall arrest system, height and purpose of climb, role within the Climbing Team, i.e. groundman, lead climber, PiC etc);
- training records;
- evidence of medical examination.

Authorised Climbers Register

7.6.30 An Authorised Climbers Register may be kept by the AP(WaH) in order to avoid the need to inspect a climber’s Logbook each time a request is made for a Permit to Climb. The requirement for a register to be kept and maintained is optional.

7.6.31 As a guide, the following details of each Authorised Climber may be entered on the register:

- Date of entry on register;
- Name of Authorised Climber;
- Employer organisation;
- Authorised Climber category (Occasional/Skilled);
- Designated Person in Charge (Yes/No);
- Safety Rule Book issued (Yes/No);
- Name and signature of assessor i.e. AP(WaH);
- Date of review;
- Any remarks and notes.
Medical Examination and Fitness to Climb

7.6.32 Climbing activities undertaken on masts, towers and other exposed high structures can be physically and mentally demanding. Consequently, Skilled Climbers who access an RHP are to have a periodic medical examination in order to identify any conditions which might affect an individual’s ability to climb. Furthermore, immediately prior to undertaking any climbing activity, the Person in Charge is to complete the relevant section of the Permit to Climb (Form H6) after interviewing each Occasional and Skilled Climber to confirm that members of his Climbing Team are fit to undertake the task.

7.6.33 Medical examination for Skilled Climbers is to be undertaken by a Medical Practitioner, competent to assess an individual’s ability to undertake the activities when accessing an RHP.

7.6.34 It is the responsibility of the PiC to ensure that each member of the Climbing Team is in possession of valid documented evidence. If the AP(WaH) is in any doubt as to the validity of documented evidence presented, he is to consult with the AE(WaH) for guidance.

7.6.35 The recommended minimum frequencies of medical examination for civilian personnel are:

- every 5 years, for personnel up to the age of 45;
- every 2 years, for personnel aged between 45 and 55;
- annually, for personnel aged over 55.

7.6.36 Military personnel whose medical employment standard is P2 and have passed their Service fitness test do not require further medical examination. Personnel downgraded to P3 or below are to make reference to ‘The Joint Medical Employment Standard’ as per 2009 DIN01-183 and JSP 950 Medical Policy – Volume 6, Chapter 7 – Leaflet 6.7.2, if to be deployed on work at height activities.

7.6.37 Although a medical examination is conducted on a regular basis, minor illnesses may result in life threatening situations for individuals climbing or working at height. Individuals must not climb if they do not feel fit enough to do so, whatever the reason.

7.6.38 Individuals are to review their health after any of the following events and seek a medical examination if they wish to maintain status as an Authorised Climber:

- an absence due to sickness of two weeks or more, where the cause or effects of the sickness may impair the ability to climb safely, e.g. taking medication that could impair vision, decision making or cause drowsiness;
- at the request of their supervisor where there is reason to suspect an individual may have difficulty undertaking a work at height task because of ill health.
Hazards - Guidance

7.6.39 Radio Frequency (RF) hazards may be encountered on the defence estate from transmitting antennas. Further guidance on RF hazards can be found in JSP 392, Part 2, Leaflet 35 – Radio Frequency Radiations.

7.6.40 Where the radiating properties of an antenna are unknown or cannot be established, then it shall be deemed to be hazardous. In this case the risk is to be managed by denying all personnel access in the vicinity of the antenna unless:

- the antenna is electrically isolated, or;
- trained and competent personnel equipped with portable RF monitoring equipment establish that there is no significant risk in the area in which work is proposed.

7.6.41 Falling objects from structures can cause a hazard, especially where they can be deflected and travel large distances.

7.6.42 Environmental and weather conditions can present a hazard. Climbing is not to be undertaken when environmental conditions are such that they would present unreasonable risk to the personnel involved. This will depend upon the types of access system, the activity to be undertaken, the height of the climb and the experience of the individual members of the Climbing Team.

7.6.43 Guidance on the mean wind speeds acceptable for each category of AC is given in Figure 7.6. The limiting wind speed values in Figure 7.6 may be adjusted subject to the Task Risk Assessment. The final decision is to be made by the PIC.

<table>
<thead>
<tr>
<th>Authorised Climber Category</th>
<th>Mean Wind Speed</th>
<th>Wind Description</th>
<th>Visual Description</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>Beaufort Scale</td>
<td>m/s</td>
<td>Knots</td>
</tr>
<tr>
<td>Occasional</td>
<td>3</td>
<td>3-5</td>
<td>7-10</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Skilled</td>
<td>4-5</td>
<td>5-10</td>
<td>11-21</td>
</tr>
<tr>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

Figure 7.6 Guidance on Authorised Climber Category and Wind Speed

7.6.44 Wind speed measurements and forecasts are usually referenced at a height of 10m above ground in open terrain. Due account is to be taken of the nature of the terrain and the height of the structure. Wind gusts can be expected to exceed the mean speed values by a factor typically of between 1.5 and 2.0 and would be the maximum recorded on a hand-held anemometer.

7.6.45 Constant monitoring of weather conditions is to be undertaken. Use is to be made of the most appropriate source of up to date information, and actions shall be taken as necessary.
7.6.46 Environmental and weather conditions, for example, temperature, rain, sun, snow, ice, dust, lightning and thunder, are to be taken into consideration. Other conditions include wind chill factor and the levels of light.

7.6.47 Electricity, moving objects, sudden noise, fumes, flora, fauna and substances hazardous to health are to be considered where relevant.

Work Equipment and Personal Protective Equipment for Work at Height – Guidance

7.6.48 Suitable work equipment and PPE for work at height is to be selected as determined by the Task Risk Assessment. WaH PPE is to be utilised during a work at height activity as per the Method Statement and strictly in accordance with the manufacturer’s instructions. All WaH PPE is to comply with the relevant and most recent British or European Standards.

7.6.49 Work restraint systems, fall arrest systems and horizontal lifelines that may include, for example, a lanyard, anchor, hook or traveller, are to be appropriate and compatible for the facility that they are installed on or designed to be used with. Further guidance is available in JSP 569 Working at Height Personal Protective Equipment.

7.6.50 All Skilled Climbers are to wear full body harnesses on RHPs unless, in unusual circumstances, the Task Risk Assessment and Method Statement show that they are not required to be worn.

7.6.51 Climbing helmets are to be worn by all ACs. Climbing helmets are to include a chin strap. All personnel within the designated site perimeter and exclusion zone are to wear head protection.

7.6.52 Eye protection is to be worn by all ACs, as appropriate for the work activity being undertaken or prevailing environmental conditions. The type of eye protection is to be compatible with the climbing helmet and also with spectacles, when worn by a climber.

7.6.53 Protective clothing is to be worn, suitable for the work activity being undertaken or prevailing environmental conditions. An all-in-one coverall is preferable enclosing all loose and flapping clothing and reducing the potential for snagging. All clothing should be comfortable to wear, with a high visibility jacket over it where appropriate, and it is not to restrict movement. All pockets should be closed with fasteners to prevent items falling out. When working in wet and windy conditions, extra protection may be required. In inclement weather, clothing may be required with hoods large enough to be worn over the climbing helmet, however such clothing is not to restrict the fitting of full body harnesses or restrict movement. Exposure to sunlight is to be considered and precautions taken as necessary.

7.6.54 Footwear is to provide firm support to the foot and ankle. It is to have a well defined instep and patterned sole to prevent slipping. Where long climbs are involved and where work is being undertaken standing on a ladder, structural member or open mesh type platform, strengthened soles are recommended.

7.6.55 Protective gloves are to be available and worn, when appropriate, suitable for the work activity being undertaken or prevailing environmental conditions, e.g. to protect against cold, heat, splinters and protective coatings.
Roof-top Working – Guidance

7.6.56 A risk assessment shall determine if a roof-top site is designated as a Restricted High Place and therefore the requirement to obtain a Permit to Climb or Standing Instruction prior to any work being carried out. If the roof-top is not designated as an RHP then a PtoC or SI shall not be necessary, however the requirements of JSP 375 Part 2 Volume 1 Chapter 27 shall apply.

7.6.57 Roof-top working is a specialised area of working at height and can be considered a dangerous activity. The roof-top worker must undergo suitable training including RF safety awareness. He may also be required to undergo training in the wearing of a safety harness and work restraint if working close to an unprotected edge.

7.6.58 Roof-top working must be planned to ensure safety. Some examples of areas that ought to be considered and covered in the MMO’s management arrangements as referred to in Section 7.3 are: hazard identification; risk assessment; competency; method statements; fragile surfaces; lifting equipment; safety of others including passers-by; safe access to the roof; weather conditions; lone working; and emergency and rescue plans.

7.6.59 Further guidance on roof-top working can be obtained by referring to the HSE Book: HSG33: ‘Health & Safety in roof work’.
Annex A

Model Forms

H1 - Register
H2 - Datasheet
H3 - Register of Residual Hazards
H6 - Permit to Climb
H7 - Register of Permits to Climb/Standing Instructions
H8 - Serious Fault Notice
H10 - Standing Instruction
Intentionally Blank
## RESTRICTED HIGH PLACES REGISTER

### Establishments:

<table>
<thead>
<tr>
<th>AE(WaH) Name</th>
<th>Organisation</th>
<th>Telephone No.</th>
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<table>
<thead>
<tr>
<th>AP(WaH) Names</th>
<th>Organisation</th>
<th>Telephone No.</th>
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### RHP

<table>
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<tr>
<th>RHP Ref. No</th>
<th>Establishment</th>
<th>Description</th>
<th>Max. height (m)</th>
<th>Access type</th>
<th>Inspection frequency</th>
</tr>
</thead>
</table>

Use continuation sheets as necessary

---

### Document distribution

Prepared by: …………………………………..AP(WaH)

Approved by: …………………………………..AE(WaH)
### Routine Work

For this RHP, the following tasks have been designated as Routine Work. To undertake these tasks, a Permit to Climb (Form H6) is to be requested from the appropriate Authorised Person (WaH). Any tasks not listed below are to be classed as Non-Routine Work. To undertake Non-Routine Work tasks, the Authorising Engineer (WaH) is to approve and sign Section 2 of the Permit to Climb (Form H6) before the Permit to Climb can be issued by the Authorised Person (WaH).

<p>| | |</p>
<table>
<thead>
<tr>
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<tbody>
<tr>
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<td>8.</td>
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<tr>
<td>4.</td>
<td>9.</td>
</tr>
<tr>
<td>5.</td>
<td>10.</td>
</tr>
</tbody>
</table>

### Access information

**Details of access arrangements**

Provide details of fixed work restraint system, lifelines or fall arrest system etc (where applicable)

Provide details of anti-climb device(s), locks and keys
## Indicate if this RHP is classified as a mast or tower (as defined by PG09/08) or other type of facility with a fixed access system.

<table>
<thead>
<tr>
<th>Mast or Tower</th>
<th>Copy of valid R8 Condition Inspection Certificate is retained by AP(WaH).</th>
<th>Location of Forms R12, R13 and R14:</th>
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<tbody>
<tr>
<td><img src="image" alt="Tick box if 'yes'." /></td>
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<td><img src="image" alt="Tick box if 'yes'." /></td>
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</table>

## Other type of facility with a fixed access.

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<tr>
<th><img src="image" alt="Tick box if 'yes'." /></th>
<th>Date of last Access System/Facility Inspection:</th>
<th>Location of last Access System/Facility Inspection Report (e.g. LOLER report, Form R104 as per TB 02/04, etc):</th>
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</thead>
<tbody>
<tr>
<td><img src="image" alt="Tick box if 'yes'." /></td>
<td><img src="image" alt="Tick box if 'yes'." /></td>
<td><img src="image" alt="Tick box if 'yes'." /></td>
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</tbody>
</table>

## Comments/observations from Access System/Facility Inspection Report

<table>
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<tr>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image" alt="Tick box if 'yes'." /></td>
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</tbody>
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## Document distribution

Prepared by: …………………………………AP(WaH)
## RESTRICTED HIGH PLACE
### REGISTER OF RESIDUAL HAZARDS

<table>
<thead>
<tr>
<th>RHP Reference No</th>
<th>Establishment</th>
<th>Location</th>
<th>Description</th>
<th>Height (m)</th>
</tr>
</thead>
</table>

### Hazards

<table>
<thead>
<tr>
<th>Hazards</th>
<th>Possible consequence</th>
<th>Yes/No</th>
<th>Details*</th>
</tr>
</thead>
<tbody>
<tr>
<td>The structure: sharp edges, paint system, falling objects.</td>
<td>Cuts and other injuries.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Electrical power supply and lighting equipment.</td>
<td>Electrocution.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fuel and flammable liquid (fire and fumes).</td>
<td>Burns, suffocation, slipping.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Feeder and other cables, RF.</td>
<td>Burns, electrocution.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transmitting antennas, RF.</td>
<td>Burns, electrocution.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Machinery, moving parts, pulleys and blocks.</td>
<td>Injury.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Warning sirens, speakers and sudden noise.</td>
<td>Deafness</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Liquid tanks (fire, fumes and explosion).</td>
<td>Drowning, burns and suffocation.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

continued on page 2
<table>
<thead>
<tr>
<th>Hazards</th>
<th>Possible consequence</th>
<th>Yes/No</th>
<th>Details*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air conditioning units.</td>
<td>Injury, disease.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tensioned elements (e.g. guys).</td>
<td>Injury.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chimneys, air vents (fumes) and atmospheric pollutants.</td>
<td>Poisoning, suffocation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Confined Spaces.</td>
<td>Various.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ancillary equipment.</td>
<td>Various</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
RESTRICTED HIGH PLACE
PERMIT TO CLIMB

<table>
<thead>
<tr>
<th>Permit Serial No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

RHP Reference No

Establishment

Location

Description

Height (m)

1  Work Activity (to be completed by AP(WaH))

<table>
<thead>
<tr>
<th>Date of work</th>
<th>Time of work</th>
<th>Start:</th>
<th>Finish:</th>
</tr>
</thead>
</table>

Description of work at height activity:

<table>
<thead>
<tr>
<th>Type of work (tick one box):</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Routine Work</td>
</tr>
<tr>
<td>Routine Work</td>
</tr>
</tbody>
</table>

If this is a subsequent request for a PtoC under an existing Non-Routine Work approval, enter the original PtoC Serial No. here:

and proceed to Section 3, otherwise proceed to Section 2

2  Approval of Non-Routine Work (to be completed by AE(WaH))

<table>
<thead>
<tr>
<th>I confirm that I have assessed the following</th>
<th>yes/no</th>
<th>Comments / Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Task Risk Assessment</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Method Statement</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Emergency and Rescue Plans</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other relevant documentation</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>AE(WaH) Name</th>
<th>Organisation</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
</table>

When approved, proceed to Section 3
**PRIOR TO START OF WORK**

### 3 Confirmation by Person in Charge

<table>
<thead>
<tr>
<th>Date of work</th>
<th>Time of work</th>
<th>Start:</th>
<th>Finish:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Climber Name</th>
<th>AC Category</th>
<th>Climber Name</th>
<th>AC Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
<td>5.</td>
<td></td>
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<tr>
<td>2.</td>
<td></td>
<td>6.</td>
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<td>3.</td>
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<td>7.</td>
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<td>4.</td>
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<td>8.</td>
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</tbody>
</table>

I confirm the following:
- I understand the requirements of JSP375 Part 2 Vol.3 Chapter 7 (Safety Rules and Procedures – Working at Height).
- The members of my team have undergone the relevant medical examination and I confirm that, to the best of my knowledge, the members of the Climbing Team are fit to undertake this task.
- The members of the Climbing Team are trained, competent and under no duress to undertake the work at height activity described in Section 1 and possess suitable work equipment and PPE for the WaH activity, as appropriate.
- The Task Risk Assessment, Method Statement and Emergency and Rescue Plans are up to date and remain valid.
- I will immediately inform the AP(WaH) of any changes to the agreed plan of work.
- I am in possession, have read and understand the Chapter 7 ‘Safety Rule Book’.

**Thunderstorm Level**

<table>
<thead>
<tr>
<th>Low, moderate or high</th>
</tr>
</thead>
</table>

**Updates obtained from**

<table>
<thead>
<tr>
<th>Person in Charge Name</th>
<th>Organisation</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
</table>

### 4 Certification by AP(WaH)

The following documents have been presented to the PiC, where ticked

- □ Form H2 – Datasheet
- □ Form H3 – Register of Hazards
- □ Form H8 – Serious Fault Notice
- □ Last Inspection Report / Form R8 – Condition Inspection Certificate

The following documents have been seen and submitted where ticked

- □ Task Risk Assessment
- □ Method Statement
- □ Emergency and Rescue Plans
- □ Logbooks / Climber Certification
- □ Medical examination evidence

I confirm that the following equipment has been switched off and/or isolated in order to remove the related hazard:

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation</th>
<th>Signature</th>
<th>Date</th>
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</thead>
</table>

**Permit to Climb issued by**

<table>
<thead>
<tr>
<th>AP(WaH) Name</th>
<th>Organisation</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
</table>

(proceed to Section 5)
### AFTER COMPLETION / STOPPAGE* OF WORK

<table>
<thead>
<tr>
<th>5</th>
<th>Confirmation by Person in Charge</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of work</td>
<td>Time of work</td>
</tr>
</tbody>
</table>

**Feedback / Reason for stopping work**: 

I confirm that the work has been completed / stopped* and that the structure and access system have been left in a safe condition and the site secured. I have reported to the AP(WaH) any incidents or occurrences. I have recorded above the reasons for stopping the work (where applicable).

Has a Serious Fault Notice (Form H8) been completed and issued?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

Person in Charge Name | Organisation | Signature | Date |
|----------------------|--------------|-----------|------|

<table>
<thead>
<tr>
<th>6</th>
<th>Confirmation by AP(WaH)</th>
</tr>
</thead>
</table>

I confirm closure / cancellation* of this Permit to Climb, and that the work has been completed / stopped* and that the structure and access system have been left in a safe condition and the site secured.

AP(WaH) Name | Organisation | Signature | Date |
|--------------|--------------|-----------|------|

* Delete as appropriate

### Document distribution

- Original: AP(WaH) - (held by PiC during work)
- Copy 1: Person in Charge
- Copy 2: AE(WaH) - (for Non-Routine Work)
# RESTRICTED HIGH PLACE
## REGISTER OF PERMITS TO CLIMB / STANDING INSTRUCTIONS

<table>
<thead>
<tr>
<th>Establishment</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>AP(WaH) Name</th>
<th>Organisation</th>
<th>Signature</th>
<th>Date</th>
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<tbody>
<tr>
<td></td>
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<table>
<thead>
<tr>
<th>PtoC / SI Serial No.</th>
<th>Date of PtoC / SI</th>
<th>RHP Ref. No.</th>
<th>Routine or Non-Routine Work?</th>
<th>Name of PiC</th>
<th>Name of PiC Organisation</th>
<th>AP(WaH) signature</th>
</tr>
</thead>
<tbody>
<tr>
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</tbody>
</table>

*use continuation sheets as necessary*

## Document distribution

**Original:** AP(WaH)
### RESTRICTED HIGH PLACE
### SERIOUS FAULT NOTICE

<table>
<thead>
<tr>
<th>RHP Reference No</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Establishment</td>
<td></td>
</tr>
<tr>
<td>Location</td>
<td></td>
</tr>
<tr>
<td>Description</td>
<td></td>
</tr>
<tr>
<td>Height (m)</td>
<td></td>
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</tbody>
</table>

When a Serious Fault is identified by any member of the Climbing Team, the PiC is to notify the AP(WaH) as soon as practicable. The AP(WaH) is to, in turn, inform the AE(WaH). The PiC and the AP(WaH) are to take appropriate and immediate action to make the RHP secure and prohibit further climbing.

<table>
<thead>
<tr>
<th>Date and Time serious fault identified</th>
<th>Date:</th>
<th>Time:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Person who identified serious fault</td>
<td>Name:</td>
<td></td>
</tr>
<tr>
<td>Description of fault</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Action taken by PiC</th>
<th>Action taken by AP(WaH):</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Date and time AP(WaH) notified</th>
<th>Date:</th>
<th>Time:</th>
</tr>
</thead>
<tbody>
<tr>
<td>PiC Name</td>
<td>Signature:</td>
<td></td>
</tr>
<tr>
<td>AP(WaH) Name</td>
<td>Signature:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date and Time AE(WaH) notified</th>
<th>Date:</th>
<th>Time:</th>
</tr>
</thead>
<tbody>
<tr>
<td>AE(WaH) Name</td>
<td>Signature:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date Serious Fault Rectified</th>
<th>Date:</th>
<th>Signature:</th>
</tr>
</thead>
<tbody>
<tr>
<td>AE(WaH) Name</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Document distribution
- Original: AP(WaH)
- Copy 1: AE(WaH)
- Copy 2: Person in Charge
# Standing Instruction Serial No.

<table>
<thead>
<tr>
<th>RHP Reference No</th>
<th>Establishment</th>
<th>Location</th>
<th>Description</th>
<th>Height (m)</th>
</tr>
</thead>
</table>

## 1 Work Activity and Documentation

<table>
<thead>
<tr>
<th>Date of Issue</th>
<th>Date of Expiry (max 12 months)</th>
</tr>
</thead>
</table>

**Description of ROUTINE and FREQUENT work at height activity:**

The AP(WaH) is to tick the boxes to confirm that the following documents have been provided to the PiC, or enter N/A where not applicable. The AP(WaH) is to provide updated copies of any documentation amended during the SI period of validity.

- [ ] Form H2 - Datasheet
- [ ] Form H3 - Register of Hazards
- [ ] Last Inspection Report / Form R8 - Condition Inspection Certificate
- [ ] Form H8 - Serious Fault Notice
- [ ] Risk Assessment
- [ ] Method Statement
- [ ] Emergency and Rescue Plan

The PiC is to submit the following documents, that may be of generic nature for the type of WaH activity being undertaken, to the AP(WaH). The PiC is to update generic documents to task specific ones, as applicable, on each occasion the SI is invoked.
Standing Instruction Serial No.

Note: In Section 2 below, indicate (by annotating Y or N) which climbers are assigned PiC status for the SI Work Activity.

### Confirmation by Person in Charge

<table>
<thead>
<tr>
<th>Climber Name</th>
<th>AC Category</th>
<th>PiC Y/N</th>
<th>Climber Name</th>
<th>AC Category</th>
<th>PiC Y/N</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td>6.</td>
<td></td>
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<tr>
<td>2.</td>
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<td>3.</td>
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<td>8.</td>
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<td>4.</td>
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<td>9.</td>
<td></td>
<td></td>
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<tr>
<td>5.</td>
<td></td>
<td></td>
<td>10.</td>
<td></td>
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</tr>
</tbody>
</table>

I confirm the following to be true prior to any climb taking place under this SI:

- That I understand the requirements of JSP375 Part 2 Volume 3 Chapter 7 (Safety Rules and Procedures – Working at Height). I am in possession, have read and understand the Chapter 7 ‘Safety Rule Book’.
- That the members of my team are to have undergone the relevant medical examination and I confirm that, to the best of my knowledge, the members of the Climbing Team are fit to undertake this task.
- That the members of the Climbing Team are to be trained, competent and not under duress to undertake the work at height activity as described in Section 1 and shall possess the appropriate work equipment and PPE for the WaH activity.
- That the Task Risk Assessment, Method Statement and Emergency and Rescue Plans shall all be date and time specific, updated as necessary and remain valid for the duration of the task.
- That the weather forecast shall be checked prior to each WaH activity.

I shall immediately inform the AP(WaH) of any changes to the agreed plan of work, change of personnel or any other situation that would affect the safety of the Climbing Team members or increase the level of risk as originally analysed.

<table>
<thead>
<tr>
<th>Person in Charge Name</th>
<th>Organisation</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

### Certification

This SI is to remain valid in accordance with the provisions made in JSP375 Part 2 Vol.3 Chapter 7. This SI can be suspended or cancelled at any time by the AP(WaH) and is to be reviewed when any change of circumstances occur following initial issue.

<table>
<thead>
<tr>
<th>AE(WaH) Name</th>
<th>Organisation</th>
<th>Signature</th>
<th>Date</th>
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</thead>
<tbody>
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<table>
<thead>
<tr>
<th>AP(WaH) Name</th>
<th>Organisation</th>
<th>Signature</th>
<th>Date</th>
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<tbody>
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<td></td>
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</tbody>
</table>

### Cancellation

I declare that

[ ] The Standing Instruction is CANCELLED

<table>
<thead>
<tr>
<th>AP(WaH) Name</th>
<th>Organisation</th>
<th>Signature</th>
<th>Date</th>
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<tbody>
<tr>
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</tbody>
</table>

Document distribution

Original: PiC (to be returned to AP(WaH) on cancellation or temporary suspension)
Copy 1: AE(WaH)
Copy 2: AP(WaH)
Model Signage

1. All signs are to be in accordance with the Health and Safety (Safety Signs and Signals) Regulations and BS5499.

2. The model sign below is for guidance only and is not shown to scale.

3. All signs are to be clearly displayed on or in the vicinity of each RHP and to be easily visible on the approach to the fixed access.

4. AP(WaH) contact details are to be added in accordance with establishment policy.

5. Additional hazard signs may be added where appropriate, e.g. RF Hazard as shown below.
Sample Climber Logbooks

(Covers only shown)

Above logbook is available from:
Kall Kwik Centre 1418, 71 High Street,
Winchester, Hampshire S023 9DA,
Tel: (01962) 864900 Fax: (01962) 864649
e-mail: winchester@kkukl4l8.kwiknet.com
References and Associated Publications

Health and Safety at Work etc Act
Management of Health and Safety at Work Regulations
The Work at Height Regulations
The Work at Height (Amendment) Regulations
The Workplace (Health and Safety and Welfare) Regulations
The Provision and Use of Work Equipment Regulations
The Personal Protective Equipment at Work Regulations
The Lifting Operations and Lifting Equipment Regulations
The Construction (Head Protection) Regulations
The Control of Substances Hazardous to Health (COSHH) Regulations
The Construction (Design and Management) Regulations
The Building Regulations
The Building Regulations (Northern Ireland)
The Building (Scotland) Regulations
Health and Safety (First Aid) Regulations
Health and Safety (Safety Signs and Signals) Regulations
JSP 375 MOD Health and Safety Handbook (All Parts and Volumes)
Safety Rule Book for Persons in Charge of Working at Height on Restricted High Places
JSP 392 Part 2 Leaflet 35 – Radio Frequency Radiations
JSP 426 MOD Fire Safety Manual
JSP 569 MOD Working at Height Personal Protective Equipment
JSP 950 Medical Policy - Volume 6, Chapter 7, Leaflet 6.7.2: Joint Medical Employment Standard
Practitioner Guide 03/10 Fixed Access Systems
Practitioner Guide 09/08 Design and Appraisal of Masts and Towers
Practitioner Guide 10/08 Condition Inspection of Masts and Towers
Technical Bulletin 00/16 Masts and Towers – standard nomenclature guidance to the identification and referencing of key elements of mast and tower structures
Technical Bulletin 02/04 Professional Appraisal and certification of World War II hangar structures
Technical Bulletin 02/05 Safety Audit and technical inspection of World War II hangar structures

Policy Instruction 03/10 – Implementation of Eurocodes on the MOD Estate

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations

BS EN 355: Personal Protective Equipment Against Falls From a Height. Energy absorbers

BS EN 358: Personal Protective Equipment For Work Positioning and Prevention of Falls From a Height. Belts for work positioning and restraint and work positioning lanyards

BS EN 361: Personal Protective Equipment Against Falls From a Height. Full body harnesses

BS EN 397: Specification for Industrial Safety Helmets

BS EN 795: Protection against falls from a height – Anchor devices – Requirements and testing

BS EN 7883: Code of practice for the design, selection, installation, use and maintenance of anchor devices conforming to BS EN 795

BS EN 1263: Safety Nets

BS 8437: Code of Practice for Selection, Use and Maintenance of Personal Fall Protection Systems and Equipment for Use in the Workplace

BS 8454: Working at Height Training

HSE Book: HSG33: ‘Health & Safety in roof work’