



Vodafone Policy Detailed Requirements

Working at Height

Policy Owner:	Policy Champion:	Version:	Date:
Head of HS&E	Senior HS&E Manager	V1.6	July 2024

Objective/Risk:	Scope
Falls from height is one of the most significant risks to life at Vodafone UK. This document sets out the minimum arrangements for work at height. This procedure also outlines how Vodafone UK puts in place arrangements, which enable us to comply with relevant legislation.	This policy applies to all Vodafone UK staff (permanent or temporary), Vodafone Group employees working in the UK and suppliers / contractors employed by other parties working on behalf of Vodafone UK.
Compliance levels are monitored and reviewed by appropriate governance bodies. Any breach will be treated as a serious disciplinary offence and may be subject to disciplinary action.	

Contents

1. Policy Principles	2
1.1 Definitions	2
1.2 Information	2
2 Specific Requirements	3
2.1 Fixed Ladders (under three metres)	3
2.2 Fixed Ladders (over three metres)	3
2.3 Lean-to ladder (less than three metres)	3
2.4 Lean-to ladder (more than three metres)	3
2.5 Lean-to ladder used with a roof ladder combination	4
2.6 Step-ladders	4
2.7 Towers, Masts and Pylons	4
2.8 Scaffolding	4
2.9 All types of Mobile Elevating Working Platforms (MEWP)	4
3 Equipment Management	5
4 Health	5
4.1 Failure of a Health & Fitness assessment:	5
5 Emergency Arrangements for climbers	5
6 Climber Categories and Training Requirements	6
7. Roles and responsibilities	7
7.1 Managers' responsibilities	7
7.2 Climbers	7
7.3 Responsibilities of the Person in Charge of Work (PICW)	8
7.4 Individual responsibilities	8
8 Exceptions	8

Detailed Requirements or Specialist Guidance

Name of document: Working at Height Detailed Requirements



9	Supporting documents	8
10	Document history	8

1. Policy Principles

This document sets the minimum standards to be applied by staff, suppliers, contractors, consultants, and others carrying out work at height for or on behalf of Vodafone.

This document describes legal requirements and standards of good practice and should be used as the basis for local instructions and safe systems of work, for work at height activities. It is not exhaustive, and references are given for further information.

There is a clear legal duty under [The Work at Height Regulations 2005](#) to plan and organise work activities so as to prevent personal injury resulting from falls or being struck by falling objects.

All work at height activities must;

- Avoid the need to work at height, or where this is not possible, ensure that suitable work equipment is selected, used, inspected, and maintained
- All works should be risk assessed, properly planned and organised
- Climbing or working at height by suppliers should be covered by that supplier's own procedures but must meet as a minimum the requirements set out in this document and may be subject to audit and inspection

All Climbing activities over three meters where a fall arrest system is used must be undertaken with two trained climbers in attendance. Should a rescue from height be required this may be undertaken by the second climber. Work at height activities using a fall restraint system such as 'first man up' do not require two climbers in attendance as no shock absorber lanyard is being used.

1.1 Definitions

Working at height - Work in any place where, if precautions were not taken, a person could fall a distance liable to cause personal injury. You are working at height if you:

- Work above ground/floor level
- Could fall from an edge, through an opening or fragile surface or
- Could fall from ground level into an opening in a floor or a hole in the ground

Competence and training - Competence for working at height requires knowledge, skill, experience and physical fitness. Climbers must also demonstrate the right behaviours and attitude.

MEWP – Mobile Elevated Work Platform

PICW – Person In Charge of Works

IPAF – International Powered Access Federation

PPE – Personal Protective Equipment

CLIMBING – Any activity where a person ascends or descends a vertical distance of more than three metres by manual method.

CLIMBER - A person ascending or descending a vertical distance more than three metres. (By manual method)

1.2 Information

For help or guidance on working at height matters please contact HSE.Helpline@vodafone.com or call 03333 04 6666.



2 Specific Requirements

2.1 Fixed Ladders (under three metres)

- Free climbing for access is allowed for fixed vertical ladders under three metres from ground level
- Operative must wear (at all times) a climbing helmet which conforms to EN 12492 EN 397
- A full written safe system of work completed by a competent person must also be in place. (Work does not include where the ladder is used solely for access.)
- Other Personal Protective Equipment (PPE) must be worn as identified by risk assessment
- All fixed ladders will be inspected annually.

2.2 Fixed Ladders (over three metres)

General Controls (applies to Options 1, 2 & 3)

- Operatives must wear (at all times) a climbing helmet which conforms to EN 12492 EN 397
- Operatives must remain connected to the ladder at all times whilst climbing
- A suitable written safe system of work is required
- Personal Protective Equipment (PPE) as identified by risk assessment
- Operatives must be trained in the correct use of the selected climbing system
- All fixed ladders will be inspected annually.

The following acceptable options are listed in order of preference (1 to 3)

Option 1

- If, after visual inspection, it is fit for purpose inbuilt fall restraint system should be used
- Suitable for all categories of trained Climbers (see Section 6)

Option 2

- Use of a fall restraint system such as 'First Man Up' where a running line is attached
- After a vertical height from the ground of 6 metres, the operative must change to 'option 3'
- Below 6m suitable for all categories of trained Climbers (see Section 6) where they have been trained on the system used

Option 3

- Use of a harness and twin lanyard system
- Rescue support climber required to be in attendance
- Suitable for Category 1, 1a & 2 trained Climbers (see Section 6)

2.3 Lean-to ladder (less than three metres)

- Three points of contact are required at all times. (feet, hand, chest, torso, under-arm)
- Unless already incorporated into the ladder, an anti-slip device or person must be used to foot the ladder
- Lean-to ladders must only be used for low risk, short duration work (less than thirty minutes)
- Ladders must meet as a minimum the relevant EN 131 standard – EN131 Non-Professional ladders are not acceptable.
- All ladders must be inspected before use by operative
- All ladders must be inspected, at least, every six months by a competent person and recorded

2.4 Lean-to ladder (more than three metres)

Where possible the use of lean-to ladders over three metres should be avoided. Alternative means of access such as a MEWP or scaffold must be considered first. However, if a lean-to ladder must be used for access or work in excess of three metres above the ground:

- A suitable written safe system of work is required



- Only when it is safe to do so, operatives should be attached by a full body harness and use a protection system to prevent the operative hitting the ground in the event of a fall from a ladder
- Three points of contact are required at all times. (feet, hand, chest, torso, under-arm)
- Unless already incorporated into the ladder, an anti-slip device or person must be used to foot the ladder
- The ladder if possible must be anchored or tied to prevent it falling away
- Lean-to ladders must only be used for low risk, short durations (less than 30 minutes)
- Ladders must meet as a minimum the relevant EN 131 standard – EN131 Non-Professional ladders are not acceptable.
- All ladders must be inspected before use by operative
- All ladders must be inspected, at least, every six months by a competent person and recorded

2.5 Lean-to ladder used with a roof ladder combination

- Use the controls section 2.4 including full body harness and use a protection system to prevent the operative hitting the ground in the event of a fall from a ladder

2.6 Step-ladders

- Must be placed on firm, level ground
- Three points of contact are required at all times. (feet, hand, chest, torso, under-arm)
- Only one person to use a stepladder at any one time
- Must be inspected before use by operative
- All ladders must be inspected, at least, every six months by a competent person and recorded

2.7 Towers, Masts and Pylons

- Site Specific safe system of work is required. This must be communicated to the climbers by a competent person
- Climbing only within your designated category (see Section 6)
- Hand tools must be tethered at all times. If this is not possible speak with your line manager
- Exclusion/drop zones must be established at the base of the tower, mast or pylon.
- Operative(s) must be attached by a full body harness and use a protection system to prevent the operative hitting the ground in the event of a fall
- All climbing PPE must be inspected before use and every 6 months as part of its statutory inspection regime.
- Operatives must wear (at all times) a climbing helmet which conforms to EN 12492 EN 397

2.8 Scaffolding

- Only fully trained and competent persons are allowed to design erect scaffolding
- Specialist scaffolding company must erect and strike all general access scaffolding used by Vodafone
- A completion certificate must be issued by erecting company
- Inspection records eg. Scaff tag must be inspected before every use of the scaffolding and the erecting company reinspect at intervals not exceeding 7 days or changes / circumstances which jeopardise the safety of the installation e.g. winds

2.9 All types of Mobile Elevating Working Platforms (MEWP)

- Only fully trained and competent persons (IPAF) are allowed to operate a MEWP
- MEWPs must comply with all current legislation, be fully maintained and must have all required inspections completed. This must be accompanied by an indication (clear to everyone involved) when the last thorough examination has been carried out
- When conducting work at height activities using a MEWP staff and contractors must remain attached at all times. This requires operatives to attend full body harness training (this restriction may not apply when working next to or over water).



3 Equipment Management

- All PPE must be visually inspected before use
- Vodafone UK must approve all equipment and PPE
- Full details of PPE requirements must be contained within site-specific risk assessment
- Each item of climbing equipment is identified with a unique serial number which is retained in a formal register by Line Manager
- Records are maintained by Line Manager for all items of climbing related equipment held by employees
- A defect reporting and prohibition system must be in place for damaged or defective equipment

4 Health

All authorised climbers will be subject to a specific health & fitness assessment, which they must pass, as follows:

- At Pre-Placement
- For staff under 40 at least once every 3 years.
- For staff between 40 -49 years every 2 years
- For staff over 50 years – Annually

Climbers should have fitness reassessed in between periodic assessments if there:-

- Are any health concerns;
- Is any long term sickness absence (greater than 1 month);
- Has been in an accident;
- Has recently undergone medical treatment.

Contractors and agency staff will need to satisfy Vodafone as to their fitness prior to being given climbing activities. In certain cases, they may need to attend the Vodafone climber's health and fitness assessment.

4.1 Failure of a Health & Fitness assessment:

If an existing climber fails their health and fitness assessment, the climber's line manager will need to raise a Manager Support line case and liaise with Vodafone Occupational Health to establish the reasons for the failure, if necessary the climber may be referred to their GP on Occupational Health's recommendation. The health & fitness assessment must be repeated within an eight-week period, and authorisation to climb is temporarily suspended during this period.

The climber is obliged to follow the prescribed course of action / exercise programme in order to achieve the required level of fitness. This must be supported by line management to ensure the climber is given all the support necessary.

A climber failing their second health and fitness assessment should again be referred to Vodafone Occupational Health or their GP to understand whether there is an underlying medical reason for them failing their health & fitness assessment and authorisation to climb is temporarily suspended.

If the colleague is deemed medically unfit to climb, they will be invited to an employment review meeting with their line manager to discuss what further support is required and look at what further options are available.

5 Emergency Arrangements for climbers

Category 1, 1a & 2 Climbers (see Section 6) must be trained in basic rescue and first aid techniques. Regular practices of both rescue and first aid should be undertaken and recorded.

All persons involved with the work at height activity must be aware of the emergency actions and, when necessary, rescue techniques required to deal with emergency involving a person at height.

The following procedure should be adopted:

- Following an incident, no action should be taken that exposes other people to further hazards
- Emergency services should be summoned, if required, giving details of the type of incident, number of persons involved and location. Emergency services must not form part of the safe system of work.



- Whilst waiting for the emergency services, first aid should be carried out if at all possible.
- The injured person may be brought to the ground if this can be done without causing further injury and is safe to do so.
- Do not attempt to rescue another person without competent assistance eg. MEWP expert, unless this is necessary to preserve life. The preferred course of action is to make the injured person safe and comfortable until further help arrives.
- If the rescue plan fails, as a last resort make the injured person safe and comfortable until further help arrives.
- All rigging teams carrying out work on structures must carry an approved rescue kit.

6 Climber Categories and Training Requirements

Non-Climber Aptitude Assessment - No formal training required. This category covers anyone wishing to become employed by Vodafone UK as a climbing engineer or rigger. This also covers anyone taking part in a climbing experience day.

Category 1 - Must be trained in basic rescue and first aid techniques, regular practice on both rescue and first aid should be undertaken and recorded. All persons involved on site in work at height must be aware of the emergency actions and when necessary, rescue techniques to deal with emergency involving a person at the height.

These are colleagues such as riggers, who are competent to work unsupervised on structures, they may directly supervise Category 1a climbers as required.

Category 1a - Trainee Climber - is a probationary category, covering colleagues who are training to become climbers. They will have attended the relevant climbing course(s), but may not to have the competence or experience to work unsupervised. They must therefore be under the direct supervision of a Category 1.

It will be the decision of the climber's manager and supervisor as to the competency level required for them to progress to Category 1 status. Advice can be sought from the health and safety team.

Category 2 - Rooftop Climber (fall arrest) – Rooftop climbers are operatives who are required to climb fixed ladders to access rooftops or safe working areas. They receive less comprehensive training than for Categories 1 and 1A and are consequently restricted from any climbing beyond Fixed Ladders for access. Category 2 Rooftop Climbers may use either fall arrest or fall restraint systems that they have been trained in.

Category 3 - Rooftop Climber (fall restraint) – Category 3 Rooftop Climbers may climb fixed ladders to access rooftops or safe working areas using fall restraint systems which they have been trained in. However, they may not be trained in rescue techniques.

Name:	Days:	Period:
Category 1		
Advanced Climber	2	Start
Advanced Climber Refresher	1	Every 12 months
First Aid at Height	1	Every three years
Rescue at heights	1	Every 12 months
Roof Top Safety and Access	1	Every three years
Monopole Rescue (required if climbing step peg monopoles)	1	Every 12 months
Category 1a		
As Category 1 above with a probationary period		
Category 2		
First Aid at Height	1	Every three years
Roof Top Safety and Access	1	Every three years
Fixed Ladder Rescue	1	Every 12 months
Category 3		

Detailed Requirements or Specialist Guidance

Name of document: Working at Height Detailed Requirements



First Aid at Height	1	Every three years
Roof Top Safety and Access	1	Every three years
First Man Up (or similar system)	1	Every three years

7. Roles and responsibilities

7.1 Managers' responsibilities

Managers who have control over colleagues or contractors carrying out climbing activities are responsible for ensuring that:

- An adequate record of competence is kept for each climber
- Climbers maintain their competence by carrying out climbing activities on a regular basis (recommended at least one climb per month)
- They are aware of the current level of fitness of the climbers they manage
- Refresher training of climbers is undertaken where required
- Health and fitness assessments are undertaken when requested by the occupational health provider or line manager
- Any significant change in a climber's physical or mental condition is notified to the occupational health provider as soon as practicable and the climbers work activities appropriately restricted
- Their climbers follow the recommendations advised following a fitness assessment to ensure support is given where necessary
- Suitable and sufficient Personal Protective Equipment (PPE), including wet weather clothing is provided and maintained for their climbers
- All climbing activities are adequately planned and controlled so as to minimise any risk
- Emergency rescue planning is undertaken
- A Person In Charge Of Work (PICW) is appointed to be responsible for the work
- Risk assessments and Safe Systems of Work (SSoW) are completed and communicated to the climbers and those involved
- Contractors are competent and have suitable equipment available for the work
- All examinations and testing of any equipment is undertaken and recorded
- Record-keeping for all climbers under their control is maintained
- Ensure manning levels are correct for different types of work i.e. Two climbers when climbing higher than three metres with a full body harness
- Managers and supervisors must ensure, through the performance management and risk assessment processes, that their colleagues are appropriately trained for their tasks.

7.2 Climbers

Vodafone employees who are authorised climbers must:

- Be attached to the structure at all times
- Only carry out climbing / working at height activities and rescue to their competency level
- Have a valid medical certificate
- Wear an approved / calibrated and working Radio Frequency Monitor (where required)
- Maintain their standard of competency in cooperation with their line manager
- Conduct a suitable and sufficient point of work risk assessment before climbing
- Notify their manager and occupational health provider if there are any ongoing health issues which may affect their ability to climb, i.e., change in health circumstances, medication, seeing a specialist, etc.
- Report any accidents, incidents, near misses or damage to property or equipment
- Advise their line manager if their climbing log / activities are becoming irregular
- Understand their responsibilities for health and safety at work
- Follow approved safe systems of work

Detailed Requirements or Specialist Guidance

Name of document: Working at Height Detailed Requirements



- Cope with the physical demands of the work without compromise to their health and safety or their ability to assess risks

7.3 Responsibilities of the Person in Charge of Work (PICW)

The PICW must ensure that:

- All work at height is properly planned and organised
- Those involved in working at height are trained and competent
- Equipment for work at height is appropriately inspected
- Risks from fragile surfaces are properly controlled
- Risks from falling objects are properly controlled
- Ensure good relations and liaison with site owners or customers
- Provide a correct briefing to all concerned with the job
- Ensure that the job is carried out in accordance with the risk assessment / SSoW including the method statement, ensuring any deviations are notified to the appropriate personnel
- Identify and sign or guard any hazards that exist after cessation of work
- Notify the customer or site owner of any incomplete work or remaining hazards
- Set up adequate exclusion zones on the ground
- Protect the safety of other parties who enter the safety zone
- Leave the site clean, tidy and free from hazards at the end of the job.

7.4 Individual responsibilities

Individual persons working at height are responsible for:

- Their own and other people's safety
- Informing the PICW if they feel unwell on the day
- Notifying their manager and occupational health provider if there are any ongoing health issues which may affect their ability to work at height safely i.e., change in health circumstances, medication, seeing a specialist, etc.
- Not deviating from the approved risk assessment / SSoW without notifying the PICW
- Keeping alert to, and immediately notifying the PICW of, unforeseen hazards
- Keeping outside antenna exclusion zones unless radio frequency sources have been isolated
- Preventing falls of tools, equipment and objects
- Using only authorised equipment
- Knowing their personal limits

8 Exceptions

Any exceptions to the requirements set out in this document must be approved by the [Vodafone UK H&S Team](#)

9 Supporting documents

- [The Work at Height Regulations 2005](#)
- [The Green Book](#)

10 Document history

Version	Date	Changes	Other standards affected	Approved by
1.0	May 2019	New document	N/A	
1.1	August 2019	Update to incorporate changes to EN131 and Training frequency.	N/A	



1.2	October 2019	Amendment to section1 & ladder inspection frequency.	N/A	
1.3	July 2020	Changes to S.2.2 and addition of Cat1&2 (S.6)	The Green Book	
1.4	Sept 2022	Links updated	N/A	
1.5	Sept 2023	Links and policy champion updated	N/A	
1.6	July 2024	Full review	The Green Book	