

# WORKING AT HEIGHTS

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## 1. PURPOSE

The purpose of this procedure is to provide guidance to David Jones with respect to the management and control of work at height activities

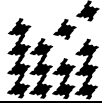
## 2. SCOPE

This procedure applies to David Jones operations that involve working at heights. The primary intention of this procedure is to identify and control contractor activities that involve a risk of a fall from two (2) or more metres in height.

Employee activities that involve a risk of a fall of less than two (2) metres, where it is reasonably likely to result in injury, shall be managed in accordance with the David Jones Risk Management Procedure (PRO-03-01-05).

## 3. KEY TERMS

Term	Description
Competent Person	A competent person is one who has acquired through training, qualification or experience, the knowledge and skills to carry out the relevant task.
Contractor	An individual other than a worker or a corporation who performs work or provides services for David Jones at a David Jones site. They are bound to complete a service/project or specified activity under a contract.
Fall	A fall by a person from one level to another that is reasonably likely to result in injury.
Fall Arrest System	Equipment or material or a combination these designed to arrest the fall of a person. Design and use must conform to the requirements of AS/NZS 1891 Industrial fall-arrest systems and devices- Series.
Hazard	Anything in the workplace that has the potential to cause injury, illness or harm to people property or the environment..
Manager	For the purpose of this procedure reference to a manager means reference to the David Jones representative who has management and control over the location or scope of works referred to.
Permit Issuer	A nominated David Jones representative who has acquired through training, qualification or experience, the knowledge and skills to carry out the following tasks: <ul style="list-style-type: none"><li>• Review of contractor work at height competencies;</li><li>• Review of contractor work at height Safe Work Method Statement or other suitable risk assessment documentation; and</li><li>• Review, authorise and close out Work at Height Permits.</li></ul>
Risk	The possibility that harm (death, injury or illness) might occur when exposed to a hazard.
Safe Work Method Statement (SWMS)	A Safe Work Method Statement: <ul style="list-style-type: none"><li>• Describes how work is to be carried out;</li><li>• Identifies the work activities assessed as having risk;</li><li>• Identifies the risks; and</li><li>• Describes the controls that will be applied to the work activities.</li></ul>



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Significant damage to property and/or the environment	Significant damage to property and/or the environment means: <ul style="list-style-type: none"> <li>• Damage to supporting structures that may compromise the integrity of the building; or</li> <li>• Damage to property in excess of \$50,000; or</li> <li>• Release of a quantity and/or type of hazardous chemical that would require recovery, dispersal or substantial clean-up.</li> </ul>
Solid Construction	An area that has: <ul style="list-style-type: none"> <li>• A surface that is structurally capable of supporting people, material and any other loads intended to be applied to it;</li> <li>• Barriers around its perimeter and any open penetrations to prevent a fall from the area;</li> <li>• An even and readily negotiable surface and gradient; and/or</li> <li>• A safe means of access and egress.</li> </ul>
Suspension Trauma	Suspension trauma can occur with a fall arrest system when a person has an arrested fall and is suspended in an upright, vertical position with the harness straps causing pressure on the leg veins.
Work at height	Work which requires the use of control measures such as scaffolding, barricading or fall arrest systems, to prevent a worker from falling from one level to another.

## 4. RESPONSIBILITIES

Role	Responsibilities
Contractors	<ul style="list-style-type: none"> <li>• Undertaking work at height activities in accordance with the requirements of this procedure.</li> <li>• Completing the required contractor pre-qualification activities, including induction, prior to undertaking work on behalf of David Jones.</li> <li>• Undertaking hazard identification and assessment activities prior to completing work at height.</li> <li>• Completing the Work at Height Permit and seeking authorisation from the Permit Issuer prior to undertaking the work.</li> <li>• Returning the Work at Height Permit to the Permit Issuer for close out of the permit and verification that works have been appropriately completed.</li> <li>• Reporting any incidents or uncontrolled hazards to the Permit Issuer for resolution and/or escalation.</li> </ul>
Workers	<ul style="list-style-type: none"> <li>• Undertake work at height activities in accordance with this procedure.</li> <li>• Report to the relevant David Jones Manager fall hazards that have not been identified or appropriately controlled.</li> <li>• Work in accordance with any Work Method Statement (WMS) or reasonable instruction provided by their David Jones Manager.</li> <li>• Report any incidents or uncontrolled hazards to the relevant David Jones Manager or Permit Issuer, as appropriate.</li> </ul>
Facilities Management or Retail Development	<ul style="list-style-type: none"> <li>• Provide feedback to Managers or Permit Issuers, as required, with regard to appropriate fire services impairment methods.</li> <li>• Ensuring that contractors undertaking activities on their behalf have completed the appropriate contractor pre-qualification activities, including induction, prior to work taking place.</li> </ul>



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Role	Responsibilities
Managers	<ul style="list-style-type: none"><li>• Overseeing implementation of this procedure relevant to their area of responsibility.</li><li>• Ensuring that fall risks under their control are identified and controlled in accordance with this procedure.</li><li>• Ensuring that contractors undertaking activities on their behalf have completed the appropriate contractor pre-qualification activities, including induction, prior to work taking place.</li><li>• Ensuring that the nominated Permit Issuer has been provided with the appropriate information, instruction and/or training to enable them to competently complete their required tasks.</li><li>• Informing the David Jones WHS Department of any incidents or uncontrolled hazards associated with work at height.</li></ul>
Permit Issuers	<ul style="list-style-type: none"><li>• Working in accordance with the requirements of this procedure.</li><li>• Reviewing the currency and suitability of contractor documentation, including SWMS and competency requirements, prior to work taking place.</li><li>• Reviewing Work at Height Permits to ensure that appropriate measures have been taken to manage risk.</li><li>• Authorising work at height activities following review of the Work at Height Permit.</li><li>• Cancelling the Work at Height Permit on satisfactory completion of the work or where permit requirements may have been breached.</li><li>• Informing the relevant Manager of any procedural or permit breaches or incidents or uncontrolled hazards associated with the work.</li></ul>
Workplace Safety and Wellbeing	<ul style="list-style-type: none"><li>• Ensure appropriate procedures are in place</li><li>• Assist in the implementation of procedure.</li><li>• Ensuring that the nominated Permit Issuer has been provided with the appropriate information, instruction and/or training to enable them to competently complete their required tasks.</li></ul>

## 5. PROCEDURE

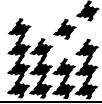
### 5.1 General

Legislation requires that hazards are identified and controlled where there is a risk of a fall from one level to another that is reasonably likely to result in injury. This procedure however, is applicable to work at two (2) metres or above, where there is a risk of a fall.

Where contractors are exposed to a fall hazard under two (2) metres in height, these activities shall be documented and appropriate controls specified within contractor Safe Work Method Statements (SWMS), or equivalent risk assessment documentation.

Where David Jones employees are exposed to fall hazards, these shall be identified, assessed and controlled in accordance with the David Jones Risk Management Procedure (PRO-03-01-05).

Note that prior to undertaking work on behalf of David Jones, contractors are required to complete the relevant prequalification activities, including inductions, in accordance with the Contractor Management Procedure (PRO-05-01-03).



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## 5.2 Identification of Fall Hazards

David Jones Managers are responsible for ensuring that work at height activities are identified and communicated to contractors prior to work commencing. Work at height activities may arise from:

- Use of portable ladders;
- Any structure or plant being constructed or installed, demolished or dismantled, inspected, tested, repaired or cleaned;
- Access to any brittle or fragile surface, such as fibre cement sheeting, corroded metal, fibreglass, acrylic polycarbonate and/or glassed skylights;
- Access to ceiling cavities where there is a risk of falling through the ceiling onto the floor below;
- Construction and deconstruction of scaffolding;
- Working near an unprotected edge or opening, such as near incomplete stairwells, floor penetrations, lift shafts, confined spaces or roof perimeters;
- Near a hole, shaft or pit, into which a person could fall, such as trenches or service pits;
- A sloping surface of greater than 15 degrees, such as a roof surface; and/or
- Any activities requiring personnel to use height access equipment, for example travel restraint or fall arrest equipment.

Identified work at height activities must be clearly documented and appropriate controls specified within contractor Safe Work Method Statements (SWMS), or other suitable risk assessment documentation.

## 5.3 Control of Fall Hazards

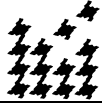
Where work at height activities are identified, controls must be applied in accordance with the Hierarchy of Control methodology, as defined in the David Jones Risk Management Procedure. Where practical, work activities that involve the risk of a fall shall be undertaken:

- From the ground; or
- If it is not reasonably practicable to perform the work from the ground, perform the work from a solid construction; or
- If it is not reasonably practicable to perform the work from a solid construction, provide a passive fall prevention device, such as guard railing or safety mesh; or
- If it is not reasonably practicable to provide a passive fall prevention device, provide a work positioning system (such as an Elevated Work Platform (EWP) or travel restraint system);
- If it is not reasonably practicable to use a work positioning system, use a fall arrest system; or
- If it is not reasonably practicable to use a fall arrest system, a ladder and/or an administrative control (such as training and procedures) may be used.

If a ladder is used as a risk control measure, it shall be;

- Fit for the intended purpose;
- Rated for industrial use and to 120 kilograms;
- Appropriate for the duration of the task; and
- Set up in a correct manner.

Identified control measures must be clearly documented within contractor Safe Work Method Statements (SWMS), or other suitable risk assessment documentation.



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## 5.3.1 Work at Height Permit

For work at a height at two (2) metres or above where there is a risk of a fall, a Work at Height Permit (FORM-05-18-01) shall be completed by the relevant contractor and shall be checked and authorised by the Permit Issuer.

Prior to authorisation of the Work at Height Permit, the Permit Issuer must review the contractors SWMS, or other suitable risk assessment documentation, to ensure suitability and currency.

A Work at Height Permit may be valid for up to 12 hours. A new permit will require completion if the person with direct control of the work changes, changes are made to the work that introduces hazards not addressed by the current permit, or new risk controls are required. The permit allows one (1) or more persons, listed on the permit, to complete the activities.

Note that a Work at Height permit is also required for ceiling cavity access, where there is a risk of personnel falling through the ceiling onto the floor or other surface below.

The Work at Height Permit must be kept until the work is completed, or if a notifiable incident occurs, for at least two (2) years after the work to which the permit relates is completed.

Once the work has been completed, the Permit Issuer shall confirm that the work site has been made safe. This shall include ensuring that any plant or equipment, including scaffolding, is secured from unauthorised access. The Work at Height Permit must not be signed off as complete, until the Permit Issuer has checked and verified that the site has been made safe.

Only when working at heights is performed as part of regular maintenance a Work at Height Acknowledgement form can be completed by the contractor annually (FORM-05-09-01).

## 5.3.2 Travel Restraint/Fall Arrest Systems and Devices

Contractors may utilise various travel restraint/fall arrest systems and devices to control fall hazards. Harnesses, lanyards and related fittings and equipment shall conform to the requirements of AS/NZS 1891.1 Industrial fall-arrest systems and devices - Harnesses and ancillary equipment. This equipment shall only be used by contractors that hold the relevant nationally accredited height safety competency. Where travel restraint/fall arrest systems and devices are to be used, this process shall be described, in detail, within the contractor's SWMS or other suitable risk assessment documentation.

Travel restraint/fall arrest systems and devices are also required to be inspected and maintained in accordance with AS/NZS 1891:2009 Industrial fall-arrest systems and devices – Selection use and maintenance.

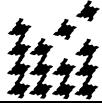
It is the responsibility of the contractor to ensure that travel restraint/fall arrest systems are used and maintained in accordance with Standard requirements, however the Work at Height Permit Issuer must ensure that contractors can demonstrate appropriate competency for equipment use and that risk control measures are specified within the contractors SWMS and Work at Height Permit.

## 5.3.3 Emergency Response Procedures

Where fall arrest equipment is being used, emergency response procedures shall be established, documented and rehearsed, prior to the activity taking place.

Emergency response procedures shall be established to enable the safe rescue of a suspended person within a reasonable timeframe, to reduce the risk of suspension trauma and to enable the application of first aid, should it be required. For this reason, contractors should be capable of conducting a rescue of a suspended worker and be familiar with onsite rescue equipment and procedures. In addition, a suitable first aid kit and personnel appropriately trained/competent in first aid practices shall be available on site. These requirements must be considered when reviewing contractor SWMSs.

Note that it is not acceptable that emergency services are relied on for the rescue of a suspended person, as emergency services may take extended periods of time (sometimes hours) to respond to these types of emergency situations.



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## 5.3.4 Fixed Anchor Points

Facilities Management are responsible for ensuring that fixed anchor points under the control of David Jones have been selected, installed and maintained in accordance with the requirements of AS/NZS 1891.4 Industrial fall-arrest systems and devices. Fixed anchor points shall be inspected and/or tested every 12 months from the installation date or more frequently, as required. Any installation, inspection and/or maintenance of anchor points shall be undertaken by a competent person.

Signs in accordance with AS/NZS 1891.4 shall be provided for each fixed anchor point. Signage shall include the date of installation and the most recent inspection/test date. The sign shall be located at each anchor point or alternatively, on a plan displayed at the entry to the area.

## 5.4 Falling Objects

Consideration must be given to any object that may fall from one level to another with the potential to cause injury or harm. This may include objects such as tools, equipment and building material.

Suitable control measures to prevent falling objects must be considered and documented within the contractor's SWMS, or other suitable assessment documentation. Potential control measures may include:

- Tethering tools and/or equipment to the worker or structure;
- Installing industrial safety netting; and
- Implementing traffic management protocols, such as barricading, signage and observers.

## 5.5 Training

Contractors undertaking work where a Work at Height Permit is required shall demonstrate appropriate competency in form of relevant industry specific training.

For work that involves the use of travel restraint and/or fall arrest systems, the contractor must demonstrate competency by means of completion of an appropriate nationally accredited height safety course administered by a Registered Training Organisation (RTO). Training, or refresher training, in height safety must have been completed within the two years prior to the work taking place.

Permit Issuers shall verify contractor competencies prior to issuing Work at Height Permits.

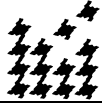
### 5.5.1 High Risk Work License Requirements

The relevant David Jones Manager or Permit Issuer must ensure that contractor holds High Risk Work Licenses, where relevant, for work at height activities. For example:

- Scaffolding;
- Rigging; and
- Operation of boom type elevated work platforms that extend greater than 11 metres.

Note that where scaffolding is erected, altered or dismantled and there is a risk of a person or object falling less than four (4) metres from the platform or structure, a High Risk Work Licence is not required.

For further information in regards to High Risk Work License and scaffolding requirements refer to the David Jones Plant and Equipment Procedure.



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## 5.6 After Hours Work

David Jones understands that some work at height activities are required to be completed after hours. This however, does not negate David Jones' responsibility to implement appropriate risk control measures to ensure that contractor activities are completed in a safe manner and in accordance with legislative requirements. As a result, the relevant David Jones Manager shall ensure that appropriate resources, such as a Permit Issuer, are available for compliance with permit requirements, as required.

## 5.7 Emergency Work

Where emergency works are required and there is a risk to the health and safety of persons or significant damage to property and/or the environment, the Work at Height Permit process may be bypassed. However, the relevant David Jones Manager, or nominated representative, shall maintain direct supervision during the work until complete or until such a point where the Work at Height Permit process can be implemented. In addition, every reasonable attempt shall be made to engage a contractor who has successfully completed the David Jones contractor pre-qualification process.

## 5.8 Additional Permits

Where the work requires the completion of any of the following activities, additional permits will require authorisation prior to work taking place:

- Confined space work, refer to the Confined Space Procedure (PRO-05-13-01);
- Hot works, refer to the Hot Work Procedure (PRO-05-11-01);
- Isolation of fire services, refer to the Hazardous Work Procedure (PRO-05-12-01);
- Electrical isolation, refer to the Hazardous Work Procedure;
- Gas work, refer to the Hazardous Work Procedure;
- Hazardous materials work, refer to the Hazardous Work Procedure; and
- Trenching or excavations, refer to the Hazardous Work Procedure.

## 5.9 Records and Forms

Record	Person Responsible	Storage Location	Storage Period
Working at Height Permit (FORM-05-18-01)	The relevant Manager	Electronic WHS Database	For the duration of the work or two (2) years as a minimum in the event of an incident
Working at Height Acknowledgement form (FORM-05-19-01)	The relevant Manager	Electronic WHS Database	For the duration of the work or two (2) years as a minimum in the event of an incident



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## 6. REFERENCES

### 6.1. Related Policies and Procedures

- Contractor Management Procedure (PRO-05-01-03)
- Plant and Equipment Procedure (PRO-04-10-01)
- Risk Management Procedure (PRO-03-01-05)
- Confined Space Procedure (PRO-05-13-01)
- Hot Work Procedure (PRO-05-11-01)
- Hazardous Work Procedure and Fire Services Isolation Procedure (PRO-05-12-01)

### 6.2. External References

- Australian State and Territory Work Health and Safety Acts & Regulations
- AS/NZS 1891.1 Industrial fall-arrest systems and devices - Harnesses and ancillary equipment
- AS/NZS 1891.4 Industrial fall-arrest systems and devices

## 7. VERSION CONTROL

Version	Section Amended	Amendment	Date Created	Author
05-14-01	all	New Procedure	08/2017	HR Manager WHS