



HEIGHT SAFETY: FREQUENTLY ASKED QUESTIONS

Can I walk on the top plate without any fall protection?

No. At no time is any person to stand on or work from an external wall top plate without suitable fall protection. This must be considered as part of your planning for a safe approach to working at height.

If prefabrication of the roof structure is not possible and trusses are assembled in situ, a safe working platform (such as scaffold) should be provided around the perimeter of the framing. Measures to prevent or mitigate the distance of a fall must also be provided internally. This can be achieved by providing a working platform immediately beneath the underside of the trusses. Either conventional scaffolding, or (if appropriate) proprietary decking systems can be used. The use of safety mesh or other safety rated products that can span across the top of the framing can also be used.

Alternatively, if a safe internal working platform cannot be provided, safety nets can be used if a safe clearance distance below the net and a suitable fixing point can be achieved. Alternatives to nets are soft landing systems such as bean bags or air bags. In some circumstances safe clearance distance can be achieved by locating bracing of the framing on the outside of the structure.

For more information read the factsheet, [*The safe installation roof trusses.*](#)

Can ceiling battens be used as a method of fall protection?

No. Ceiling battens do not provide any safe fall protection. Both metal and timber ceiling battens are generally a lightweight element designed to provide support for ceiling linings and not to sustain the loads imposed by a person falling. Even if a ceiling batten was engineered to sustain the loads imposed by a person falling there is still risk of the person sustaining serious injuries by landing on the battens.

For more information read the factsheet, [*Caution – ceiling battens do not provide fall protection.*](#)

Do I have to use edge protection on a single-level dwelling?

Yes. Single-storey dwellings require the same level of protection as two-storey dwellings and the same process must be followed to establish appropriate control measures. For example, where edge protection is the appropriate control measure required, it should be installed on a single-level dwelling in the same way that it should be installed on higher dwellings.

For more information see the factsheet, [*Be safe working on roofs.*](#)

Is it alright for me to use my saw horse as a working platform?

Generally saw horses or saw horses with planks are not recognised as suitable work platforms, as they have not been designed for this purpose. The exception to this rule would be if the equipment was purposely designed and manufactured for this use and meets a relevant Standard.

There is a variety of access equipment on the market to make working at height safer. Your duty is to take all practicable steps to prevent any harm that would result from a fall.

Working from a form of work platform with a guardrail will offer far better protection to prevent a fall than one without.

Focusing your attention on work above your head increases the risk of stepping off the board or platform and falling if you do not employ a guardrail.

Any work platform should be suitable for the purpose it is being used. There are two types of work platform:

- a proprietary (engineered) work platform constructed and used in accordance with the manufacturer's instructions
- a constructed work platform using construction materials and built by a competent person. (This is only to be considered if no alternative forms of work



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platform are readily available.)

Have a look around your local access equipment hirer or trade supplier for ideas for more appropriate equipment. Podium steps could be one option.

Your hazard assessment must consider the site-specific factors and arrive at a decision that is justified by your assessment.

For more information refer to section 6.6 of the *Best Practice Guidelines (BPG) for Working at Height* and the factsheet, *Temporary work platforms*.

Is my three-step ladder still legal to use?

Principals or employers may ban the use of these ladders on some sites as a way of managing the risk of the ladder being used incorrectly. The HSE Act does not ban the use of three-step ladders, but does require that they are used in the way the manufacturer had designed them. Ladders are access tools – but occasionally, in the right circumstances and with the right care taken, they're appropriate for short-duration work.

The evidence shows that in many accidents involving ladders they were being used as a work platform, not being used correctly, or were improperly maintained.

The Ministry has provided information about safe ladder use, which can be found in the *BPG* and in the factsheet, *Safe working with ladders and stepladders*.

The HSE Act requires the employer to assess the hazards and plan a safe system of work. This should take into account all practicable steps to eliminate or reduce, as low as is reasonably practicable, the risk of a person falling a distance likely to cause personal injury.

This safety plan should be completed before you start work. It is therefore your responsibility to ensure that when you work at height you work safely without risk to yourself or any other person.

Measures you select need to be proportionate to the risk. The use of a three-step ladder is considered appropriate for low-risk, short-duration tasks. Advice on safe use should be sought from the manufacturer/supplier. Generally they are designed for internal use, close to a wall, and not for the user to be standing on the top rung/step.

Focusing your attention on work above your head could lead to stepping off the ladder and falling.

Alternatives to step ladders are light and mobile equipment that offers the protection of a guardrail. Podium steps could be one option.

What is the maximum height I can use my ladder?

The HSE Act does not specify heights, but the selection of the most appropriate access equipment for a particular task is a requirement of the law.

You also have a duty, where working at height cannot be avoided, to take all practicable steps to prevent any harm that would result from a fall. Work platforms, scaffolding and towers all offer protection from a fall occurring. Ladders and step ladders do not offer fall protection, so should be the last form of work access equipment to be considered.

If you have selected ladder use, your hazard assessment must justify why it is not possible to use safer equipment.

If your hazard assessment determines that a ladder is the right piece of equipment to be used, then the right ladder should be selected and used in the correct manner.

Ladders should be used for low-risk and short-duration tasks, and three points of contact should always be maintained to prevent a person slipping and falling.

The risk of falling onto something below a ladder (e.g. spiked railings or glass covering) is equally relevant as the height of the potential drop in terms of risk.

The Australian/New Zealand Standard *AS/NZS 1892.1. Portable Ladders* sets the following limits for ladder heights:

- for temporary non-fixed ladders the maximum length for:
 - a single ladder is nine metres
 - an extension ladder is 15 metres
 - a step ladder 6.1 metres.
- where a ladder rises nine metres or more above its base, landing areas or rest platforms should be provided at suitable intervals.

What training is required to erect my own scaffolding and to what height can I go?

Anyone erecting scaffolding should be competent (or in the case of trainees, supervised by a competent person) for the type of scaffolding work they are undertaking. They should have received appropriate training relevant to the type and form of scaffolding they are working on.

If any part of the scaffold is five metres or more above the ground it must be erected, altered and dismantled by, or under the direct supervision of, a person with an appropriate Certificate of Competency. This work must



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be notified to the Ministry of Business, Innovation and Employment as hazardous work. A scaffold register should be kept on site as a record of regular inspection.

Where work is performed using mobile scaffolds, the scaffold should be erected by a competent person and used in accordance to the manufacturer's specifications.

There are courses available that will give you the skills and knowledge to work safely and erect non-notifiable prefabricated scaffolding up to five metres in height. Many manufacturers and suppliers provide training for the safe use of their scaffolding system. As a bare minimum you should at least have a good working knowledge of the manufacturer's instructions.

Refer also to regulations 22 and 53 of the Health and Safety in Employment Regulations 1995 and the [*BPG for Scaffolding in New Zealand*](#).

Do I need a rescue plan when working with height?

Yes. Emergency procedures need to be considered for reasonably foreseeable circumstances, such as stuck access equipment or rescue following a deployed fall arrest.

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

In other situations, consideration may need to be given to the use of other work equipment, such as MEWPs or proprietary rescue systems. Whatever the method selected, you should be able to access the required equipment and demonstrate that if someone falls there are arrangements in place in order to rescue that person. Anyone involved in a rescue must be trained in the procedures and use of the equipment required.

How often does scaffolding need to be inspected?

A scaffold should be inspected before it is used for the first time and then every seven days, until it is removed. It should also be inspected each time it is exposed to conditions likely to cause deterioration, e.g. following adverse weather conditions or following substantial alteration.

NOTE: there are different requirements for different scaffolds, for example suspended scaffolds.

For more information see the [*Best Practice Guideline for Scaffolding in New Zealand*](#).

Can I use a safety harness when working alone?

Allowing people to work alone when using a safety harness system is not normally recommended and should be avoided due to the need for assistance in emergency situations.

If you are considering doing this you need to be able demonstrate that you have completed a comprehensive hazard assessment that has considered the site-specific factors and be able to justify that working alone is going to be adequately managed. This must only be for low-risk, short-duration and minor roof work where the harness system is set up so the worker will be in total restraint at all times.

You will need to ensure that the worker is fully trained and experienced, and that you have a clear safe system of work that covers the job. The safe method of work should outline what steps will be taken to ensure that the worker will be constantly monitored to ensure that they have not fallen (e.g. regular reporting in to a supervisor, a roving supervisor or co-worker).

From what height do I have to use fall protection?

Where the potential of a fall exists, the following simple hierarchy of controls shall be considered by duty holders:

1. Can the job be done without exposing persons to the hazard? (Elimination.) This can often be achieved at the design, construction planning and tendering stages.
2. If elimination is not practicable then steps should be taken to isolate people from the hazard. This can be achieved using safe working platforms, guardrail systems, edge protection, scaffolding, elevated work platforms, mobile scaffolds and barriers to restrict access.
3. If neither elimination nor isolation is practicable then steps should be taken to minimise the likelihood of any harm resulting. This means considering the use of work positioning systems or travel restraint systems, safety harnesses, industrial rope access systems and soft landing systems.

The HSE Act requires that if there is a potential for a person at work to fall from any height, reasonable and practicable steps must be taken to prevent harm from resulting.

Doing nothing is not an option.