

Statement

In the work at height industry, there are two principal sets of regulations which apply. These are the Work at Height Regulations 2005 and the Construction Design & Management Regulations 2007. Both of these regulations have had a positive impact by clearly stating the responsibilities of duty holders. We do not consider the regulations to be unduly burdensome; therefore, we believe they should remain in force. However, since the introduction of these regulations, there has been significant misinterpretation by duty holders in determining how to practically comply. Considerable time and effort is spent by the work at height industry to rectify these misinterpretations.

To determine an objective outcome in respect of either or both of these regulations, there is a need for accurate reporting on how successful these are in improving safety. It is the working at height industry's view that currently there is insufficient reporting in place to ascertain this. This means that it is difficult to validate the effectiveness of the regulations and also proves a challenge to industry in terms of identifying areas on which to focus in the future.

It is the work at height industry's recommendation that more specific pan-industry reporting is required in respect of falls from height, so that more useful data can be gathered. To compensate for the existing acknowledged 'under-reporting' under RIDDOR, we propose the development of a 'no blame reporting' approach which may be more effective in gathering factual evidence on the causes of non fatal work at height incidents.

The work at height industry continues to value competent HSE site inspection as a means of penalising non-compliance issues. The Access Industry Forum has offered (and continues to offer) to educate and instruct HSE resources to ensure that this government department is and remains competent to carry out this role in line with latest industry guidance and best practice with regards to working at height.

Government direct or indirect initiatives to develop further work at height improvements are welcome, though a regular and consistent dialogue with the work at height industry as a 'prime stakeholder' should be adopted from the very start of these developments. The current experience of inconsistent dialogue between our industry and government departments provides a challenge in ensuring that any regulatory developments are informed, practicable and accountable.

Regardless of the challenges faced, the work at height industry continuously works to inform and educate duty holders on their responsibilities in all aspects of working at height and is established as a competent resource for industry guidance on specialist matters of work at height.

The content contained within the submission dated 25th July 2011 to Professor Löfstedt is intended to outline this work in more detail.

Significantly more information is available upon request.

Access Industry Forum

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