



Labour Department (Headquarters)

勞工處 (總處)

Your reference 來函編號：

Our reference 本處檔案編號： (51) in LD/1-55/30 Pt. 4

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To whom it may concern

Statutory Requirements about Work-above-ground Safety

The Labour Department (“LD”) is highly concerned about the risk associated with above-ground work and the serious and fatal accidents related to such work in recent years. Out of the 703 fall-from-height work accidents investigated by LD since 2012, 429 cases (61%) involved a falling distance of 2 metres or less. 232 cases (33%) involved improper use of ladders, and 8 of them caused fatalities.

2. Apart from the potential risk of working at height, the above statistics also underline the lack of awareness of some workers and/or their employers about the importance of using a safe working platform in undertaking above-ground work. Despite LD’s on-going efforts to promote workers’ and employers’ awareness about such risk, we every now and then still come across cases of workers using ladders to conduct maintenance, cleansing and construction works. Regardless of the height of such works above ground, using ladders for above-ground work is unsafe, as borne out by the statistics mentioned in paragraph 1.

3. In fact, the use of ladders for above-ground work is generally prohibited under the Occupational Safety and Health Ordinance (“OSHO”) (Cap. 509). OSHO applies to all workplaces, including schools/education institutions, and binds the Government. Pursuant to OSHO, employers/ responsible persons for schools (where work takes place) are required to safeguard the safety and health of their employees at work, including developing/maintaining safe plant and safe systems of work, and providing necessary information, instruction, training and supervision. For those employees who are required to perform above-ground work in schools/education institutions, safe means of support should be provided for their use, including the

provision and maintenance of suitable working platforms, so as to comply with the relevant provisions under OSHO.

4. Above-ground work is not uncommon in schools/education institutions, like minor building maintenance, cleansing as well as tree pruning, etc. To eliminate fall-from-height hazards, employers/responsible persons for schools/education institutions should conduct task-specific risk assessments to identify all related hazards and adopt necessary safety measures/procedures to eliminate the hazards. They should include, but not limited to, the following:

- (i) Avoiding above-ground work where possible by, for example, designing and using specific hand tools to allow the work to be done safely on the ground;
- (ii) Refraining from using ladders (*Appendix I*) for work of any height;
- (iii) Providing and ensuring the use of a suitable light duty working platform (*Appendix II*) where above-ground work is unavoidable;
- (iv) Where light duty working platform cannot be erected and used in certain work environment (for example, where space is restrictive), providing and ensuring the use of a suitable step platform (梯台) or hop-up platform (功夫橇) (*Appendix II*) as appropriate if light duty above-ground work has to be carried out; and
- (v) When all the above measures are found not feasible in special circumstances such that using ladders is unavoidable, exercising stringent control through conducting a thorough risk assessment, implementing a permit-to-work system¹ and adopting all necessary safety measures related to use of ladders.

¹ A permit-to-work system is an important means to control the occupational safety and health risks arising from hazardous work processes. To control these risks, a system to issue a permit before a highly hazardous work process is allowed to be carried out (i.e. a permit-to-work system) should be developed and implemented to ensure that all necessary safety measures with regard to the risks have been put in place. As to the permit-to-work system for work-at-height safety, you may make reference to the “Guidelines on Work-above-ground Safety” issued by the Construction Industry Council at the following website:

http://www.cic.hk/cic_data/pdf/about_cic/publications/eng/guidelines/Guidelines%20on%20Work-above-ground%20Safety_e.pdf

5. Employers/ responsible persons for schools (where work takes place) should also make arrangements to ensure that the contractors you might engage will take the above steps to ensure above-ground work safety of their workers.

6. Work-at-height safety has long been the focus of LD's strategy to promote workers' occupational safety. We have been undertaking rigorous enforcement and promotion work, targeting at the education sector.

7. Should you need any further information or advice, please feel free to contact Divisional Occupational Safety Officer Mr. LO Wai-kai on 2852 4960.

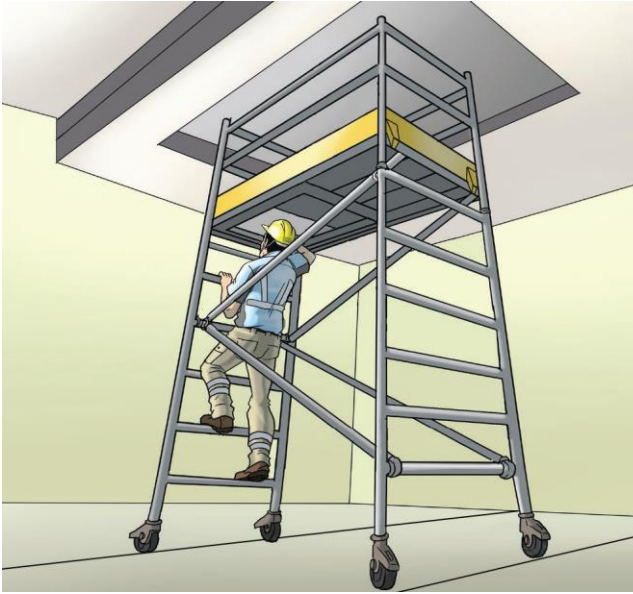


(CHAN Cheung-hing)
for Commissioner for Labour



Examples of ladders

Appendix II



(a) Light duty working platform



(b) Step platform (梯台)



(c) Hop-up platform (功夫橈)