

SG29:17

Internal Edge Protection on Scaffold Platforms

1. INTRODUCTION

Main contractors and scaffold contractors often debate the requirement for internal edge protection. Whilst the scaffold must comply with the law, we must not lose sight of why the scaffold is required in the first place. The aim of this guidance note is to give some practical guidance on how to comply with the Work at Height Regulations 2005 (WAHR) with regard to internal edge protection.

2. PLANNING SCAFFOLDING REQUIREMENTS

Both WAHR and CDM Regulations 2015 require that all work at height is properly planned, including consultation with all relevant parties, including the client, main contractor, designer and especially the contractor/scaffold user who will undertake work from the scaffold (e.g. the painting contractor) and the specialist scaffolding contractor at tender/contract stage.

A thorough consultation before work commences will negate many of the problems that currently cause a lot of anxiety at site level once the job is under way.

3. WHAT IS INTERNAL EDGE PROTECTION?

Where there is a likelihood of persons or materials falling and causing injury at the internal edge of the scaffold nearest to the structure, the law requires a physical barrier of double guardrails and toe boards.¹



¹ The pictorials in this guidance document have been taken from NASC Technical Guidance, TG20:13. Please also note some of the themes/topics detailed in this Safety Guidance are also repeated in SG28 and SG32.

The WAHR specify that the minimum distance from the working platform to the top of the upper guardrail shall be at least 950mm, and the gap between it and any intermediate guardrail and toe board should not exceed 470mm.

However, it is recognised that the installation of complete internal edge protection can prevent or make work difficult when installing mullions, windows, cladding and brickwork etc.

In certain work situations enforcement agencies will assess compliance with legislation in a sensible and practical manner, provided a safe system of work is in place and a suitable and sufficient risk assessment of the work activity has been carried out.

This safe system of work may allow for some internal edge protection to be removed for a limited period of time to allow for a specific task to be carried out, providing other measures to prevent or mitigate a fall are in place and enforced.

Removal of edge protection etc is allowed under the Work at Height Regulations (Schedule 2(5)(2)) but it is also important that various options are explored during the planning phase with all relevant parties, especially the scaffold contractor and all trades who will work from the scaffold.

4. THE SCAFFOLD CONTRACTOR'S GOOD PRACTICE

Scaffolding providers must ensure that the scaffolds they hand over comply with the legal requirements. This also applies to the internal edge protection as described above. However, on occasions users may request that internal edge protection is either omitted or left incomplete (e.g. a single guardrail only).

Where the internal edge protection is incomplete or no internal edge protection has been requested by the client, scaffolding providers must advise the client on the Handover Certificate that the scaffold does not comply with current legislation and that they have a duty to prevent falls, of persons or materials, from any part of the scaffold, which in the absence of guardrails and toe boards means implementing a safe system of work. This could include the provision of other means of fall protection, limiting access to authorised people only, and ensuring that those performing the task are provided with adequate information, training and supervision as part of a safe system of work (or a permit to work system if it is appropriate).

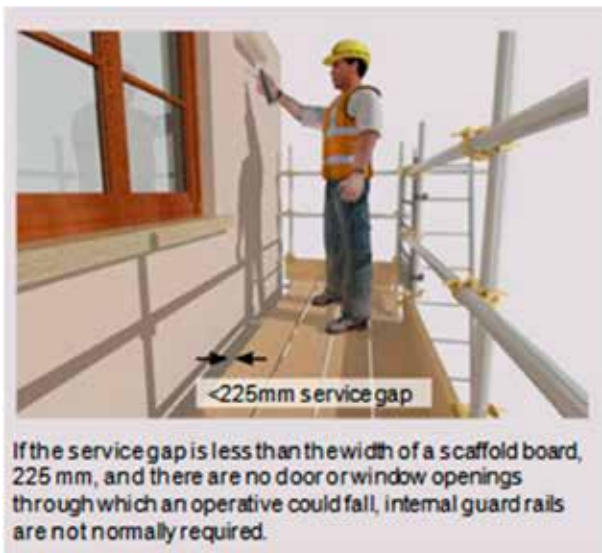
Once the scaffold is handed over the user must be advised that the scaffold then becomes their responsibility.

5. ADVISING THE USER (e.g. Painting Contractor)

The *Work at Height Regulations* (WAHR) require physical edge protection to be provided where personnel or materials could fall and cause injury. Whilst the requirements for edge protection in general are fairly prescriptive in the WAHR, practical considerations should be taken into account by main contractors in consultation with their scaffolding suppliers in risk assessing the extent of compliance for internal edge protection. The following paragraphs give practical advice on common situations where scaffold users have requested less than full internal edge protection.

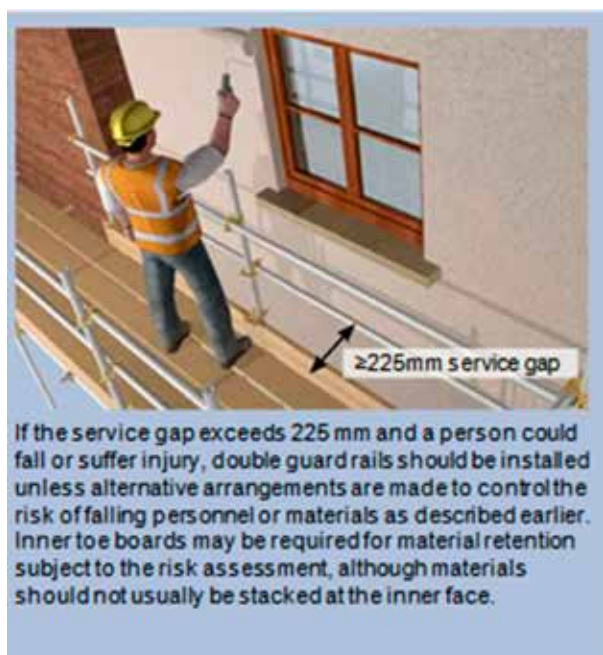
The requirement for internal edge protection depends on the size of the *service gap*: the gap between the inner edge of the scaffold platform and the building, as illustrated below.

However, because the installation of complete internal edge protection can impede or even prevent certain types of work, a safe system of work, following a risk assessment, may be used in place of some or all internal protection. If the client requests that internal edge protection is not installed this must be recorded on the scaffolding handover certificate.



The picture on the left show a gap less than the width of a board, whereas the picture on the right shows a gap of approximately one board's width (225mm). Please note that a gap larger than 225m needs very careful risk assessing.

It may also be prudent for the client/main contractor/user to put in place a Permit to Work system when a single guardrail is used.



Generally in situations where double guardrails are required internally, toe boards should also be fitted. However, there may be circumstances where because of the nature of the work, toe boards would have to be continuously removed and replaced. However, it must be remembered that the toe board can be part of the system to retain persons on the platform. In these cases it is permissible to have a safe system of work that uses alternative arrangements to control risk from falling objects, subject to a risk assessment and control measures put in place.

These alternative arrangements may include the prevention of persons working directly below or to put in protection fans, protective walkways or exclusion zones. It is important that physical barriers and signage are used to identify exclusion zones and are removed as soon as they are no longer required. Leaving them in place once the work is complete may lead to them being ignored in future situations.

The key is proper risk assessment with appropriate control measures to ensure a safe system of work. As work progresses, the scaffold user will be required to reassess the effectiveness of the safe system of work/control measures and amend as necessary.

6. REFERENCES AND FURTHER READING

Legislation

- The Health and Safety at Work Act 1974;
- Construction (Design and Management) Regulations 2015;
- Work at Height Regulations 2005.

Guidance

- NASC Guidance Documents, including the following:
 - SG4 Preventing falls in scaffolding operations;
 - SG7 Risk Assessment & Method Statements;
 - SG36 Unauthorised modifications to scaffolding;
 - TG20 Operational Guide/Design Guide.

Whilst every effort has been made to provide reliable and accurate information, we would welcome any corrections to information provided by the Writer which may not be entirely accurate, therefore and for this reason, the NASC or indeed the Writer, cannot accept responsibility for any misinformation posted.



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