



S₂ Partnership Ltd
Intelligent Risk Management

Advice Note

Working Near Fragile Surfaces

Introduction

The HSE's annual workplace fatality [figures](#) for 2019-20 highlight that approximately a quarter of all worker deaths were due to falls from a height. According to the HSE, at particular risk are workers who carry out small, short-term maintenance and cleaning jobs.

To ensure a person's safety, all roofs should be treated as fragile until a competent person has confirmed they are not.

Many injuries and fatalities sustained from working at height, particularly those involving fragile surfaces, are mostly avoidable. Implementing some simple assessments and controls can significantly reduce the number of accidents occurring on roofs near fragile surfaces.

Typical control measures including risk assessments

Firstly, all roof work requires a risk assessment. Simple jobs may have fewer requirements, but more complex jobs need a more in-depth assessment. It is important to remember that all roof work is dangerous, and it is essential that all risks are identified before the work starts and that the necessary equipment, appropriate precautions and systems of work are provided and implemented.

It is also essential to note that [Section 9 of the Work at Height Regulations](#) states the following in regard to working near fragile surfaces: "Every employer shall ensure that no person at work passes across or near, or works on, from or near, a fragile surface where it is reasonably practicable to carry out work safely and under appropriate ergonomic conditions without his doing so." If the work cannot be avoided, then working platforms or fall protection systems are required. There is no definition of "appropriate ergonomic conditions", but "fragile" refers to "a surface which would be liable to fail if any reasonably foreseeable loading were to be applied to it".



The [HSE](#) suggest that a hierarchy of steps should be taken to deal with the danger of a fragile surface:

1. **Avoidance:** Plan and organise work to keep people away from fragile surfaces so far as possible, e.g. by working from below the surface on a mobile elevating work platform or other suitable platform.
2. **Control:** Work on or near fragile surfaces requires a combination of guard rails, fall restraint, fall arrest and safety nets slung beneath and close to the roof.
3. **Communication:** Warning notices must be fixed on the approach to any fragile surface. Those carrying out the work must be trained, competent and instructed in use of the precautions required.
4. **Co-operation:** On business premises, contractors should work closely with the client and agree arrangements for managing the work.

In order to effectively manage contractor activities, it is important that relevant information is held relating to fragile surfaces and that this is provided to anyone working in close proximity to fragile surfaces. This should include photos of areas (if available) and also include areas where the presence of fragile surfaces cannot be confirmed. This information should form part of a robust permit to work process.

Ensuring the safety of contractors

If work must be carried out and cannot be avoided, the HSE state that prior to work commencing on a roof or at height, building owners/occupiers should ensure:

Assessment – the roof/area is assessed by a competent person using a safe system of work

Planning – the work is planned by a contractor with sufficient expertise on fragile roof working

Specification – non-fragile assemblies are specified for new and replacement roofs

Time – contractors have allowed sufficient time to carry out the work safely; and

Implementation – the planned safe system of work is implemented.



Access equipment / fall arrest issues

Work on fragile materials must be carefully planned to prevent falls through the roof, and, wherever possible, work should be carried out from below. However, that isn't always an option. If work must be carried out from above, the priority should be to use non-contact methods, such as a mobile elevating work platform (MEWP) or a scaffolding gantry - but never improvise using forklifts or extension ladders.

Installing barriers around fragile surfaces

If the previously highlighted controls are not reasonably practicable to implement, then the installation of guardrails should be considered. There are numerous suppliers of barrier protection, that are very effective at preventing access to fragile surfaces, such as skylights. Barriers and toe boards can be placed around the fragile areas, reducing the risk of workers coming into contact with them and putting themselves at risk.

How can the S₂ Partnership help?

For further advice or guidance about work at height, [contact our health & safety team](#). Our consultants carry out a Working at Height Risk Assessments, which help ensure that standards meet the specific requirements of the Work at Height Regulations, including any areas that contain fragile surfaces.

A site-specific report will be produced which contains details of the areas examined, risk assessment and actions to be implemented. Actions will be supported with digital photographs, where necessary. Our consultant will also examine safe working practices, method statements and risk assessments provided by contractors who work in or access these areas. For further information, [contact us](#).



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