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GOOD PRACTICE NOTE

FALL PROTECTION CHAMBER

Report on Unit Standard 120362

1. Introduction

The Institute for Work at Height was formed in January 2009 being a merger of the Specialised Access Engineering Manufacturers Association (SAEMA) and the Rope Access And Fall Arrest Association (RAFAA) desirous of creating safety awareness and in turn "professionalism in the overall Work At Height Industry". Its stated objectives and functions can be summarised as:

- Provides a unified voice for suppliers and users of all types of work at height equipment and services.
- Sets and maintains Industry standards.
- Develops guidelines and frameworks for skills development within the Industry.
- Impresses on clients the professionalism, integrity and credibility of IWH members by adherence to a Code of Ethical Practice.
- Represents Industry views to Government Departments and the Private Sector.
- Provides information on all related work at height matters.
- Provides a regular forum for members to meet and discuss matters of mutual interest.

2. Background

During November 2012, a request was received to evaluate Unit Standard 120362 *Monitor, report and make recommendations pertaining to specified requirements in terms of working at heights* and comment on its suitability for use as a measure of competence for operators who conduct work at height using fall protection equipment including harnesses.

3. Discussion

3.1. Title and description of the unit standard

- 3.1.1. The title of the unit standard mentions skills that include 'monitor', 'report' and 'make recommendations'. No mention is made of skills or scenarios that involve actual work at height. The title seems to highlight administrative skills rather than technical skills.
- 3.1.2. The recommendations that an operator needs to be able to make, once deemed competent to the unit standard, relates to 'specified requirements' associated with working at height. Therefore, it appears that such an operator would need to be able to interpret, implement and comment on a set of pre-compiled (not by the operator himself/herself) requirements that in some way relates to work at height. Again, the skills that are required appear to be predominantly administrative.
- 3.1.3. The field of application of this unit standard is defined as Health Sciences and Social Services. Other unit standards in this field include medical, management, social development and related skills. No other unit standards with technical work at height skills requirements could be found in this field.

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3.2. Purpose of the unit standard

- 3.2.1. Only one purpose for the unit standard is provided: 'People credited with this unit standard will be able to describe the requirements with regard to working at height'. The specific requirements referred to in the unit standard are:
- 3.2.1.1. Requirements relating to performing work in elevated positions.
 - 3.2.1.2. Inspecting, caring for and storing fall arrest equipment effectively.
 - 3.2.1.3. The safety, health and environmental principles regarding the safe construction and maintenance of working platform, ladders. Scaffolds and walkways in elevated positions.
- 3.2.2. It is notable that the unit standard expressly states that what is required is 'knowledge and understanding of the requirements' of certain skills and work systems and not the skills themselves. This is further highlighted by the provision of no less than five different fields of work at height for which the requirements should be known. Each of the five fields (fall arrest, working platforms, ladders, scaffolds and elevated walkways) that are mentioned have their own skills based unit standards or sets of unit standards in some instances. It is therefore inconceivable that unit standard 120362 requires or in any way guarantees competence in any of the five fields mentioned under its purpose.

3.3. Learning assumed to be in place

- 3.3.1. It is notable that two other unit standards are included under learning assumed to be in place. Both these unit standards relate to emergency response and care.

3.4. Unit standard range, outcomes and assessment criteria

- 3.4.1. It is notable that the list of site-specific requirements excludes Fall Protection Planning, although it includes risk assessment procedures.
- 3.4.2. All of the assessment criteria appear somewhat vague and ambiguous. For example, Assessment Criterion 1 under Specific Outcome 1 simply states: 'The requirements to perform work in elevated positions are explained'; Assessment Criterion 3 under Specific Outcome 1 states: 'The method used to conduct work in elevated positions is explained'. Such an open-ended requirement is prone to misinterpretation as there is a range of different methods, even in only the five fields of work at height referred to under the purpose of this unit standard.
- 3.4.3. Assessment Criterion 1 under Specific Outcome 3 requires 'knowledge and understanding pertaining to the inspection of working platforms, ladders, scaffolds and walkways in elevated positions'. It should be noted that the requirement is only for knowledge and understanding of such inspections and does not include the actual skills to conduct such inspections. It is inconceivable that a thorough inspection of all the related equipment mentioned in those five fields is what is in view under this single assessment criterion.
- 3.4.4. Assessment criterion 3 under Specific Outcome 3 states 'The need to ensure correct record keeping is explained'. (Assessment criterion 2 under Specific Outcome 2 states virtually the same). Reference to any specific records or how such records are to be completed are absent and, again, the criterion is vague and ambiguous.



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- 3.4.5. It is notable that no skills or even actual work at height per se were mentioned anywhere under the specific outcomes and assessment criteria of unit standard 120362.

3.5. Critical Cross-field Outcomes (CCFO)

- 3.5.1. The unit standard CCFO identifying states: 'Solve problems by working at heights [sic], the individual will be required to embark on remedial action, which requires problem solving'. This is the first mention in unit standard 120362 of actual working at height. However, the grammar is confusing and non-sensual. Either way, it seems a rather strange critical cross-field outcome to expect from an individual who is not required to have any practical skills related to working at height.
- 3.5.2. Actual work at height is again referred to under the unit standard CCFO collecting. Again, a rather strange critical cross-field outcome to expect from an individual who is not required to have any practical skills related to working at height.

3.6. Qualifications utilising this unit standard

- 3.6.1. The qualifications that are listed as utilising this unit standard are Construction Health and Safety (national certificate) and Occupational Hygiene and Safety (national certificate). In the context of safety related occupations, it seems reasonable for learners to have knowledge and understanding of some work at height facets, without requiring them to be competent in the skills that are required to actually carry out work at height. As such, this unit standard may form a valuable addition to those occupations, without serving as a measure of competence for conducting actual work at height.

3.7. Accredited providers

- 3.7.1. It is notable that only three accredited providers are listed for unit standard 120362, all three of which are mining firms. This seems to affirm the notions that were made under 3.6.

4. Conclusions

4.1. Having studied the unit standard, it is concluded that:

- 4.1.1. Unit standard 120362 does not seem to be intended to be used as a measure of competence for conducting work at height.
- 4.1.2. Unit standard 120362 does not require or specify any particular skills for working at height.
- 4.1.3. The context in which unit standard 120362 exists or occurs appears to relate to general health and safety management, particularly in the mining sector.
- 4.1.4. In light of the findings of this report, the Institute for Work at Height strongly advises against the use of unit standard 120362 as a measure of competence for working at height.

5. References

Unit Standard 120362 *Monitor, report and make recommendations pertaining to specified requirements in terms of working at heights*. South African Qualifications Authority.
<http://regqs.sqa.org.za/viewUnitStandard.php?id=120362>

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