

**Submissions from the Public Consultation on
The draft Code of Practice for Access and Working Scaffolds
(June 2017)
(2 Submissions received)**

Submission 1

Document Submitted by	Georgina Molloy BSc. Eng. C Eng. MIEI.
Organisation	Scaffold Design Ireland
Reference Number	CK-gd_2260
Submission Date	27/06/2017
Document reviewed by Michael Mc Donagh	

and/or ground.

22/06/17

Code of Practice for Access and Working Scaffolds

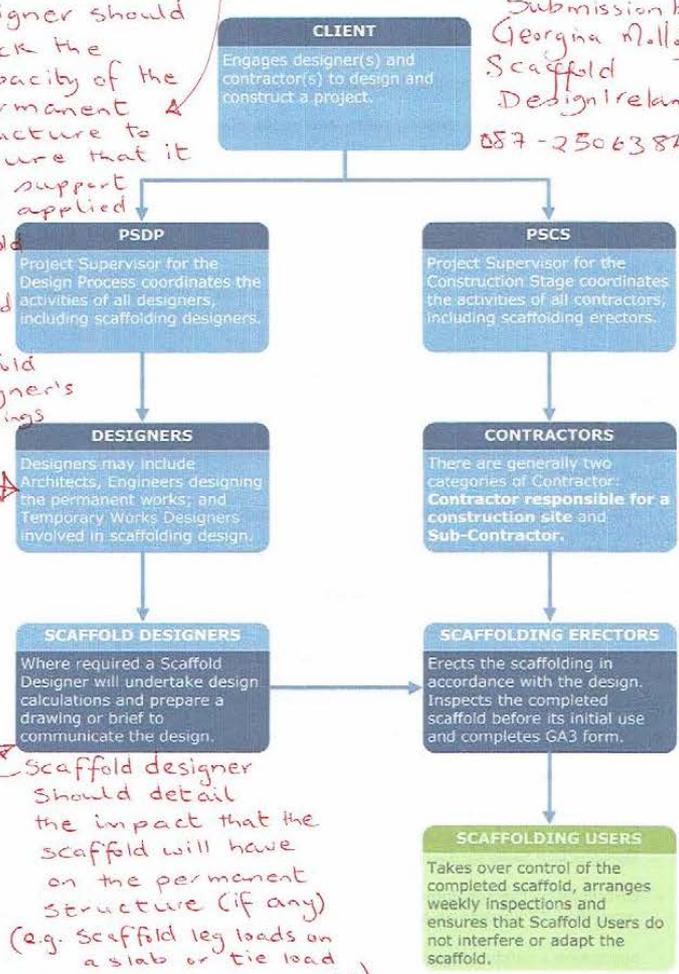
Permanent works designer should check the capacity of the permanent structure to ensure that it can support the applied

Scaffold loads detailed on scaffold designer's drawings

Submission by Georgina Malloy Scaffold Design Ireland 087-2506384

Scaffold designer should detail the impact that the scaffold will have on the permanent structure (if any) (e.g. Scaffold leg loads on a slab or tie load)

Figure 2: Duty Holders on a wall



1.7.1. The Client

The Client's duties include to:

- take reasonable measures to ensure that anybody they appoint as a designer, contractor or project supervisor is competent to carry out the work and have allocated, or will allocate, adequate resources to complete the work in a safe manner;
- make known to the designer, contractor, project supervisors any information that they have that is necessary for completing the design / construction of the project in a safe manner.

1.7.2. Project Supervisor for the Design Process (PSDP)

The duties of the PSDP include:

- identifying hazards arising from the design or from the technical, organisational, planning or time-related aspects of the project;
- where possible, eliminating the hazards or reducing the risk;
- communicating necessary control measures, design assumptions or remaining risks to the PSCS so they can be dealt with in the Safety and Health Plan;
- ensuring that the work of designers is co-ordinated to ensure safety;
- organising co-operation between designers; *in the case of scaffolding. Organise co-operation between scaffold designer and design of any other structure that the scaffold will have an impact on*
- preparing a written safety and health plan for any project where construction will take more than 500 person days or 30 working days or where there is a Particular Risk and deliver it to the client prior to tender; *any other structure that the scaffold will have an impact on*
- preparing a safety file for the completed structure and giving it to the client; *will have an impact on*
- when appropriate, issuing directions to designers, contractors or others; and *e.g. permanent works*
- notifying the Authority and client of non-compliance with any written directions issued. *e.g. Designer.*

1.7.3. Designers

Designers of permanent structures and temporary scaffolds have duties which include:

- identifying any hazards that their design may present during construction and subsequent maintenance;
- where possible, eliminating the hazards or reducing the risk;



Side protection is a set of components forming a barrier to protect people from the risk of falling and to retain materials.

Sleeve coupler is a coupler used for joining two tubes located co-axially.

Standard is an upright member.

Swivel coupler is a coupler used for connecting two tubes crossing at any angle.

Tie member is a component of the scaffold that connects it with an anchorage at the structure.

Transom is a horizontal member normally in the direction of the smaller dimensions of the working scaffold.

Uniformly Distributed Load (UDL) is a load distributed evenly along the length of a member. *or area (kN/m²)*

Working area is the sum of the platforms in one level, which provides an elevated safe place for people to work on and to have access to their work.

Working scaffold is the temporary construction that is required to provide a safe place of work and the necessary access for the erection, maintenance, repair or demolition of buildings and other structures.

1.9.2. System Scaffolds

Scaffold system is:

- a) a set of interconnecting components, mostly purpose-designed for the scaffold system;
- b) the assessed standard set of system configurations; and
- c) the product manual.

Component is a part of a scaffold system that cannot be dismantled further, e.g. diagonal or vertical frame.

Configuration is a particular arrangement of connected components.

Connection device is a device that connects two or more components.

Element is an integral (e.g. welded) part of a component, such as a transom of a vertical frame.

System configuration is a configuration of the scaffold system comprising a complete scaffold or a representative section from it.

A **standard set of system configurations** is a specified range of system



NOT sure why you would design one of these?
The design would have to assume that it was not present.

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? **Movable tie** is a tie that may be temporarily moved for the execution of work. ? ~~it~~ ~~would~~ ~~you~~ ~~have~~ ~~that?~~

Non-movable tie is a tie that will not be moved during the life of a scaffold, as agreed between the user and the scaffold erector.

Plan brace is a brace in a horizontal plane.

Raker is an inclined load-bearing tube.

Reveal pin is a fitting used for tightening a reveal tube between two opposing surfaces.

Reveal tie is the assembly of a reveal tube with wedges or screwed fittings, and pads, if required, fixed between opposing faces of an opening in a wall together with the tie tube.

Reveal tube is a tube fixed by means of a threaded fitting or by wedging between two opposite surfaces of a structure, e.g. between two window reveals, to form an anchor to which the scaffold may be tied.

Scaffold board is a softwood board generally used with similar boards to provide access, working platforms and protective components such as toe-boards on a scaffold.

Sole board is a timber, concrete or metal spreader used to distribute the load from a standard or base plate to the ground.

Spigot is an internal fitting to join one tube to another coaxially (see also *Joint pin*).

Spigot pin is a pin placed transversely through the spigot and the scaffold tube to prevent the two from coming apart.

Supplementary coupler is a coupler added to a joint to back up the main coupler taking the load when the estimated load on the joint is in excess of the safe working load of the main coupler.

Sway transom is a transom extended inwards in contact with a reveal or the side of a column to prevent the scaffold moving sideways.

Through tie is a tie assembly through a window or other opening in a wall.

Toe-board is an up-stand at the edge of a platform, intended to prevent materials or operatives' feet from slipping off the platform.

1.9.4. Definitions in Safety, Health and Welfare at Work (General Application) Regulations 2007, Part 4: Work at Height

Access and **egress** include ascent and descent.

All scaffolding must be erected in accordance with a specific design. For standard proprietary system scaffolds, built in standard configurations, it would be sufficient to use the generic designs developed by the system manufacturer for those configurations. Other recognised designs, e.g. - such as provided for in TG20 for tube and fitting scaffolds, may also be appropriate to use provided they're appropriate to the scaffolding being erected. For scaffolds that fall outside the scope of these standard designs a bespoke design will be required. If a bespoke design is required (see Section 2.3.2), then a competent scaffold designer must be engaged to design the scaffold. Where it is reasonably foreseeable, the project designer should identify the need for a bespoke scaffolding at the design phase of the project. The project supervisor for the design process (PSDP) should co-ordinate this scaffold design with the permanent works design team.

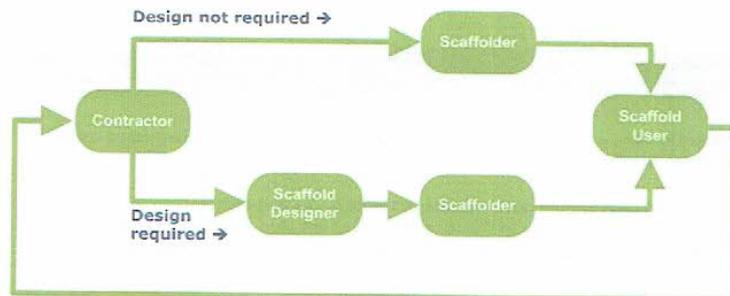


Figure 5: Design Process

PSDP and other designers
i.e. Permanent works designer
should be in this flow chart



The contractor should define a policy in relation to scaffolding. This written scaffolding policy should:

- include a commitment to put measures in place to protect employees, others at work and members of the public from the risks associated with scaffolding;
- require that competent persons be employed to erect, maintain and dismantle scaffolds;
- include a commitment to comply with relevant health and safety legislation, including the Safety, Health and Welfare at Work (Construction) Regulations

Note: Applying a proof test load that is higher ~~than~~ than is required may damage the integrity of the tie.

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to meet these distances, the manufacturer may permit plan bracing to be installed between the tie and the standards.

The vertical interval between ties should be determined in the scaffolding design and communicated to the scaffolding erector. In the case of system scaffolds, reference should be made to the manufacturer's instructions.

I have often seen them interfered with!

Scaffolds of normal width of 1.25m should not be erected 4m higher than the highest line of ties, unless the scaffold has been cross braced between ledgers (cross bracing) and the ties and scaffold are capable of taking the extra loads.

Unless a design shows that they can be removed, or a sufficient No. are left in to manufacturer instructions

3.3.2.1. Cast-in and Drilled Anchorages

Where lateral support is to be provided by the structure served, both the structural adequacy of that structure and the attachment of the anchorages shall be verified. If the base material is too weak to support an anchor, or if the structure as a whole is too weak, other means of access should be considered, including free-standing designed scaffolds or mobile elevated work platforms (MEWP).

These anchorages, which are cast or drilled into the permanent structure, ~~can~~ should usually be left in place until the scaffold is being dismantled. They are not subject to the degree of interference associated with, for example, through ties. These anchorages and their components should have a safe working capacity of at least 6.1kN (637kg) in both tension and compression.

If the calculated wind load is less than 6.1kN then the safe working capacity of Workers installing anchorages should be instructed in the manufacturer's recommendations for each type of anchorage and these recommendations should not need to be strictly complied with. To be 6.1kN or greater.

No refer to TG4:11

The anchorage capacity should be established by either proof load testing or by testing to failure a representative sample of anchorages. The manufacturer's recommendations in relation to the safe working capacity for your base material and testing should be followed.

Proof testing and failure testing are not the same thing

Testing should be carried out on all projects.

If you are giving a range how do we decide whether to use 1.2 or 1.5? TG4:11 gives 1.25

A sample of anchors to be used shall be tested to a load between 1.2 and 1.5 times the required tensile load. In the case of ties requiring 6.1kN tensile capacity, this means a test load of 9.2kN (where a tie load of 12.2kN is required the proof load equals 18.3kN). It is assumed that the allowable load of the anchor is in all cases greater than or equal to the working load. The pass criterion is that no significant movement of the anchor is apparent; a visual check is sufficient.

refer to TG4:11 if you do failure testing proof testing is still required.

A minimum of 3 anchors shall be tested and at least 5% (1 in 20) of the total job (see Table 2). If any anchors fail to satisfy this test requirement then the reason for failure should be investigated and the rate of proof testing at least doubled, i.e. at least 6 tests and 1 in 10 overall.

"or equal to" means there is no safety factor → incorrect.

This is explained in more detail in TG4:11 Health and Safety Authority

- CIS10 Tower Scaffolds
- CIS56 Safe Erection, Use and Dismantling of Falsework

National Access and Scaffolding Confederation (UK)

www.nasc.org.uk

- SG4:15 Preventing Falls in the Scaffolding Industry
- TG20:13 Guide to Good Practice for Tube and Fittings Scaffolding
- TG4:11 Anchorage Systems for Scaffolding

Should be used!

Prefabricated Access Suppliers' and Manufacturers' Association (UK)

www.pasma.co.uk

- PASMA Operator's Code of Practice
- DVD - Guide to the Safe Use of Mobile Access Towers
- DVD - Don't Fall for It!

this gives much better guidance on tie testing and requirements than is given in this document.

Building Research Establishment (UK)

www.bre.co.uk

- BRE Digest 284 Wind Loads on Canopy Roofs
- BRE Digest 346 Parts 1 to 8, Assessment of Wind Loads
- BRE Digest 436 Parts 1 to 3, Wind Loads on Buildings

Other

- H. B. Walker (1975), *Wind Forces on Unclad Tubular Structures*, Croydon: Constructional Steel Research and Development Organisation, Constrado publication 1/75

The scaffold should incorporate one type of façade bracing (see Figure 13).

System scaffolding should be braced in accordance with the manufacturer's recommendations. The recommended maximum façade brace spacing for system scaffolds ranges from 3 unbraced bays to 8 unbraced bays; however this depends on the system used and the manufacturer's erection manual must be referred to.

Tube and fitting scaffolds should be braced at least every 6 bays, unless movement along the building is prevented by other means.

Bracing should be fixed as near to the standard-ledger intersections as possible. The bracing should extend to the bottom of the scaffold with no breaks. This applies to all scaffolds including pavement scaffolds.

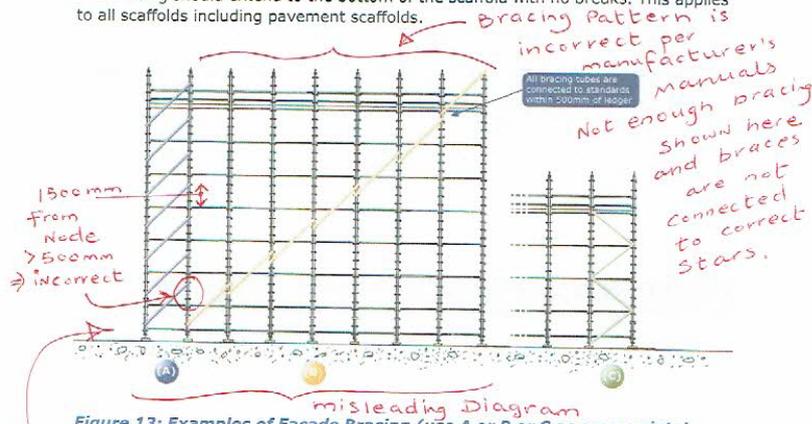


Figure 13: Examples of Façade Bracing (use A or B or C as appropriate)

*
Some
manufacturer's
limit
pattern
A to
6 lifts
high.
7 shown
here.

3.3.4.2. Ledger Bracing

Ledger or cross bracing runs at right angles to the façade and is in a vertical plane. Some types of system scaffold do not require cross bracing unless:

- ties cannot be located as required by the manufacturer or are liable to be removed; or
- the height of the scaffold is 4m or more above the last line of ties.

Where ledger bracing is installed for the above reasons, the loads on the adjacent ties will be increased. The system manufacturer's instructions should be consulted to determine whether ledger bracing is required.

for the Construction Stage (PSCS).

Where the contractor intends to load materials onto the scaffold by crane or teleporter, loading bays should be incorporated into the scaffolding at appropriate locations. If material has to be loaded directly onto the working platform, the risks of overloading or destabilising the scaffold must first be assessed by the contractor and the loading controlled.

All other forms of scaffold, including special scaffolds, should be subject to design and calculation by a competent designer.

The need for a specific scaffold design should be identified at the earliest possible time in a project. Where it is foreseeable at design stage that a specific scaffold design will be necessary the permanent works designer should identify this, and flag it to the PSCS/Contractor, e.g. for a structure with unusual elevations etc. In other circumstances it may only become evident later in the project that a standard configuration of system scaffold will not suffice. Once identified as a requirement a competent scaffold designer must be engaged and a specific temporary works scaffold design produced. The PSDP has a duty to ensure the co-ordinations of designs and to ensure co-operation between designers and must be vigilant to proactively identify any designs, or design changes arising during the construction phase of a project.

Sections 6 and 10 of I.S. EN 12811 Part 1, 2004 provide technical data for the structural design of scaffolds.

For illustrative purposes, typical examples where design and calculation may be necessary include:

- sheeted system scaffolds;
- system scaffolds erected in areas where the wind pressure exceeds that specified in I.S. EN 12810 Part 1, 2004 or where the design wind speed exceeds that specified by the scaffolding manufacturer;
- system scaffolds where the maximum height, tie spacing, imposed loads, bay widths or number of working lifts exceeds the manufacturer's recommendations;
- scaffolds where the tie or anchorage capacity is less than 6.1kN (621kg);
- tube and fitting scaffolds where the height exceeds 50m for unsheeted scaffolds and 25m for sheeted scaffolds;
- scaffolds subjected to impact, e.g. mechanical loading of heavy materials onto working platforms;
- scaffolds where the bottom transoms or ledgers have been omitted to allow

The working platform is actually a loading Bay then it should

be designated as such.

This would be many many situations see notes on ties.

Very misleading!
If a working platform is going to be overloaded then it becomes a "loading Bay" whether mechanically loaded or not. 9/10

2.2. Choice of Scaffolding Equipment

Scaffolding equipment should be selected on the basis of a risk assessment that takes account of the nature of the work to be performed, the loads to be withstood and the height from which falls may occur. The decision may also be affected by the shape of the building; the environment that the scaffolding is to be erected in; the capacity of the foundations; the duration that the scaffolding is to remain in place; and the ability to provide ties to the scaffolding.

2.3. Layout and Design

A well laid-out scaffold will require the minimum amount of modification during its life and will be capable of being erected, used and dismantled in safety.

2.3.1. Layout

The initial layout will have a significant impact upon the safety of the completed scaffold. When considering the layout the following points should be remembered.

- The scaffold should be laid out so as to reduce the gap between the structure and the scaffold to a minimum, except where guard-rails will be erected adjacent to the structure.
- The standards should be positioned so as to avoid manhole lids or shallow drains, which may not be able to sustain the scaffold loading.

2.3.2. Structural Design of Scaffolds

Strength and stability calculations for scaffolding should be carried out unless:

- an appropriate reference drawing and calculations covering the structural arrangements contemplated is available; or
- the scaffolding is to be assembled in conformity with the manufacturer's design or a recognised standard configuration. *- what does this mean?*

Warning

The designer should have a full working knowledge of I.S. EN 12810 and I.S. EN 12811 and be competent to undertake scaffolding design. Competence is defined as having sufficient training, experience and knowledge appropriate to the nature of the work to be undertaken. The level of expertise required will depend on the complexity of the design. The scaffold design must take account of the relevant technical guidance, manufacturer's instructions and the guidance referenced in Appendix E.

Scaffolding contractors must specify the system of scaffolding in use, and provide copies of the manufacturer's guidelines to the Contractor and the Project Supervisor

Decision/Result of review

Page 1 – This is covered in other areas of the COP, including with the introduction of a Temporary Works Co-ordinator, who may be appointed to assist the Project Supervisors with their duties. Not deemed necessary to include this extra detail within the flowchart.

Page 2 – The duties of the PSDP are outlined and include the co-ordinating of all designers including scaffolding designers and all temporary works designers. This is dealt with in a number of areas of the COP particularly in Section 2.3 Layout and Design.

Page 3 – Definition changed to “Uniformly Distributed Load (UDL) is a load distributed evenly along the length of a member or working platform.”

Page 4 – There are circumstances where a tie may need to be temporarily moved due to the nature of the works being engaged in. In these circumstances alternative arrangements must be in place to secure the structure for the duration of time the tie is moved.

Page 5 – Flowchart has been removed and issues dealt with in the text.

Page 6 – Section has been reviewed and alterations made including allowance for variance from the tie capacity based on a design / calculations of a competent person and also reference to TG4:17. Also removed range (1.2 to 1.5) for testing of ties. It is now set at 1.5.

Page 7 – Just an observation, no change requested.

Page 8 – As per Section 1.9 all drawings within the COP are only for illustrative purposes and they do not supersede or replace the illustrations or arrangements contained in the system manufacturer’s erection instructions. The title of the figure has been amended to highlight that the bracing examples should not be mixed.

Page 9 – Paragraph states if material is to be loaded onto the scaffold by teleporter or crane loading bays should be in place at suitable locations.

Comment on tie capacity is dealt with in change to tie section allowing for calculations of a competent person to allow for different tying capacity / configuration.

Page 10 – This section has been changed accordingly to “scaffolding is to be assembled in conformity with the manufacturers design, appropriate designs by competent designers or TG20”

Submission 2

Document Submitted by	Conor Kenny
Organisation	None Specified
Reference Number	CK-gd_2261
Submission Date	27/06/2017
Document reviewed by Michael Mc Donagh	

<p>Draft 2017 Code of Practice for Access and Working Scaffolds</p> <p>Submission:</p>	<p>Feedback:</p>
<p>Comments and Feedback as follows –</p> <p>1. Page 11 states that “The manual will generally give the user a number of generic designs for a variety of basic configurations of the system. It the user varies from the manual when erecting the scaffold then a specific bespoke scaffold design will be required”. It should be clarified, and defined, what a “specific bespoke scaffold design” actually means; for example could a scaffolding design prepared for one particular construction project be utilised on another particular construction project?</p> <p>2. Page 15 states that “The main duty holders for any project involving scaffold structures include suppliers, project supervisor for the design process (PSDP), designers of permanent works, designers of permanent works, designers of scaffold structures, project supervisor for the construction stage (PSCS), contractors and workers”. Designers of permanent works is repeated twice, and temporary works designers are not mentioned. This should be amended.</p> <p>3. Page 16 “Figure 2: Duty Holders” does not show all the interactions between duty holders; e.g. scaffold designers are normally employed by contractors, designers would coordinate with Contractors / Scaffold designers, as would the PSDP too.</p> <p>4. Page 17 states that “The duties of the PSDP include: where possible, eliminating the hazards or reducing the risk” this is not a duty of the PSDP the relevant duty is to “take account of the general principles of prevention during the various stages of the design and preparation of a project”; for example only the relevant duty holder (e.g. Designer / Contractor) could actually</p>	<p>This is a widely used and understood term in scaffolding. Bespoke in this context means that the design will need to be specifically developed for the specific scaffold to be erected. This would only be applicable to that situation.</p> <p>This has been amended as per request.</p> <p>The flowchart is only representative of the interactions between the key dutyholders which are dealt with in detail in the text. It has been amended to show interaction both ways between the contractor and scaffold designer.</p> <p>Amended as per request.</p>

“eliminate the hazard” in their design / methodology after coordination / notification by the PSDP.

5. Page 17 states that “The duties of the PSDP include: when appropriate, issuing directions to designers, contractors or others; and notifying the Authority and client of non-compliance with any written directions issued”. The CoP should clarify exactly when it is appropriate to issue directions to designers, contractors or others, and what specific action(s) the Authority will take, once notified, to ensure said directions are actually implemented.

6. Page 18 states that “Designers of permanent structures and temporary scaffolds have duties which include: communicating necessary control measures, design assumptions or remaining risks to the PSDP so they can be dealt with in the Safety and Health Plan” this should be amended to include “Designers of permanent structures and temporary scaffolds have duties which include: communicating necessary control measures, design assumptions or remaining risks to the PSDP so they can be dealt with in the Safety and Health Plan, and with a view to protecting the safety, health and welfare of persons involved in construction work. Designers must communicate this information to the PSDP by way of a their written Design Risk Assessment, and their written, and signed Permanent / Temporary Works Design Certificate (as currently contained within the HSA publication “Guidelines on the Procurement, Design and Management Requirements of the Safety Health Welfare at Work (Construction) Regulations 2006)”

7. Page 22 the definition of “Design” should be the same definition included in the Safety, Health and Welfare at Work (Construction) Regulations 2013, and by way of example state this would include scaffolding temporary works design.

8. Page 29 states that “All scaffolding must be erected in accordance with a specific design. For standard proprietary system scaffolds, built in standard configurations, it would be sufficient to use the generic designs developed by the system manufacturer for those configurations. Other recognised designs, e.g.- such as provided for in TG20 for tube and fitting scaffolds, may also be appropriate to use provided” It should be clarified, and defined, what a “specific design” and “generic design” actually means with specific reference to the definition of “design” in the Safety, Health and Welfare at

This is outside the scope of a Scaffold COP. There are many various circumstances where a PSDP may decide to issue a direction. This is dealt with in the Guidelines on the Procurement, Design and Management Requirements of Safety, Health and Welfare at Work (Construction) Regulations 2013 (page 39).

This is outside the scope of the COP Scaffolding. This is dealt with already in the guidance highlighted above. Reference and links to this guidance are in the COP.

Amended as requested.

As per reply to comment 1 these are widely used and understood terms within scaffolding. A specific design is one specifically developed for a particular job whereas a generic design would be a design, mostly developed by the system scaffold manufacturer, developed to suit many common applications e.g. the Cuplok system scaffold manual would provide a generic design for erection of its system scaffold around a typical detached house. This can be used as the design by contractors carrying out this type of

<p>Work (Construction) Regulations 2013; also refer to Item 1.</p> <p>9. Page 29 states that “Where it is reasonably foreseeable, the project designer should identify the need for a bespoke scaffolding at the design phase of the project. The project supervisor for the design process (PSDP) should coordinate this scaffold design with the permanent works design team”. Similar comment to items 1 & 8 the term “bespoke scaffolding” should be clarified, and defined. In addition this should be amended to state “Where it is reasonably foreseeable, the project designer should identify the need for a bespoke scaffolding at the design phase of the project. Designers must communicate this information to the PSDP by way of a their written Design Risk Assessment, and their written, and signed Permanent / Temporary Works Design Certificate (as currently contained within the HSA publication “Guidelines on the Procurement, Design and Management Requirements of the Safety Health Welfare at Work (Construction) Regulations 2006). The project supervisor for the design process (PSDP) should coordinate this scaffold design with the permanent works design team”.</p> <p>10. Page 29 Figure 5: Design Process does not encapsulate the design process and excludes other important duty holders including the PSDP, Permanent Works Designers, and other Temporary Works Designs; also refer to item 3.</p> <p>11. Page 35 states that “the scaffolding is to be assembled in conformity with the manufacturers design or a recognised standard configuration.” Similar comment to items 1, 8 & 9 the term “manufacturers design” should be clarified, and defined with specific reference to the definition of “design” in the Safety, Health and Welfare at Work (Construction) Regulations 2013.</p> <p>12. Page 36 states that “Where it is foreseeable at design stage that a specific scaffold design will be necessary the permanent works designer should identify this, and flag it to the PSCS/Contractor, e.g. for a structure with unusual elevations etc. In other circumstances it may only become evident later in the project that a standard configuration of system scaffold will not suffice. Once identified as a requirement a competent scaffold designer must be engaged and a specific temporary works scaffold design produced. The PSDP has a duty to ensure the co-ordinations of designs and to ensure co-operation between designers and must be vigilant to proactively identify any designs, or</p>	<p>work.</p> <p>See above replies to submissions 1 & 6 above.</p> <p>This diagram has been removed.</p> <p>See reply 1 above.</p> <p>See reply to 1 and 6 above.</p>
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design changes arising during the construction phase of a project". This should be amended to state that "Where it is foreseeable at design stage that a specific scaffold design will be necessary the permanent works designer shall identify this, and flag it to the PSDP, and PSCS/Contractor, e.g. for a structure with unusual elevations etc. Designers must communicate this information to the PSDP by way of a their written Design Risk Assessment, and their written, and signed Permanent / Temporary Works Design Certificate (as currently contained within the HSA publication "Guidelines on the Procurement, Design and Management Requirements of the Safety Health Welfare at Work (Construction) Regulations 2006). In other circumstances it may only become evident later in the project that a standard configuration of system scaffold will not suffice. Once identified as a requirement a competent scaffold designer must be engaged (normally by the Contractor) and a specific temporary works scaffold design produced. The Designer(s) have the duty to provide all this necessary information to the PSDP, and the PSDP has the duty to ensure the coordination of those designer's activities and organising cooperation between said designers". In addition the term "specific temporary works scaffold design" should be clarified, and defined with specific reference to the definition of "design" in the Safety, Health and Welfare at Work (Construction) Regulations 2013.

13. On page 36 the typical examples where design and calculation may be necessary should include 'Scaffolding erected in water, and Scaffolding erected over water'

14. Page 39 states that "Scaffolding contractors must specify the system of scaffolding in use, and provide copies of the manufacturer's guidelines to the contractor and the PSCS". This should be amended to state that "Scaffolding contractors must specify the system of scaffolding in use, and provide copies of the manufacturer's guidelines to the contractor and the PSCS, and to the PSDP when requested to do so; and in order to verify the scaffolding has been erected in accordance with manufactures instructions and does not require a temporary works scaffolding design."

This would be outside the standard configuration and would require design. However it is not included as a design as scaffolding should not be erected in water. If it is erected over water then it would be a slung or cantilevered scaffold which is already listed. The risks of working near or over water are referenced elsewhere in the COP.

Reference to providing this to the PSDP, where required, has been included.

<p>15. Pages 41 & 89 include “Project Supervisor” it is assumed this is the PSCS; this should be clarified and amended.</p>	<p>Amended to clarify PSCS.</p>
<p>16. Page 42 states that “Other workers should be effectively excluded from the work areas by signs and/or solid barriers and solid barriers or hoarding should be used to exclude members of the public from the area. Where persons cannot be excluded from the working area, they should be protected by the provision of properly constructed sheeting or fans.” This should be amended to state that “Other workers should be effectively excluded from the work areas by signs and solid barriers. Solid barriers, or hoarding, should be used to exclude members of the public from the area. Where persons cannot be excluded from the working area, they shall be protected by the provision of properly designed and constructed sheeting or fans.”</p>	<p>Amended as requested. ‘And /or’ left in place as there may be circumstances where both are not required.</p>
<p>17. Page 47 - 3.3.2.1. Cast-in and Drilled Anchorages – this entire section should be amended and updated to provide specific references to the requirements of the HSA CoP for the Design and Installation of Anchors, in particular to the applicability to scaffolding and the requirements for various duty holders to provide the required Anchor Forms.</p>	<p>This section has been amended and includes reference to the COP on design and installation of anchors and NASC TG4:11 ‘Anchorage systems for scaffolding’.</p>
<p>18. Page 76 states that “Working near overhead cables is a listed particular risk under the Safety, Health and Welfare at Work (Construction) Regulations and should therefore have been identified by the PSDP at the design stage of the project”. This should be amended to state that “Working near overhead cables is a listed particular risk under the Safety, Health and Welfare at Work (Construction) Regulations 2013 and should therefore have been identified by the Permanent Works Designers and the PSDP at the design stage of the project”</p>	<p>Amended as requested.</p>
<p>19. The Authority should proof read the entire document and ensure all references are up to date and applicable; including Appendix E.</p>	<p>Completed.</p>
<p>20. In order to make the proposed “Draft 2017 Code of Practice for Access and Working Scaffolds” workable and implementable across the entire Construction Industry the previously issued HSA “Guidelines on the Procurement, Design and Management Requirements of the Safety Health Welfare at Work (Construction) Regulations 2006” should be amended, updated, and reissued as a Health & Safety Authority Code of Practice (e.g. the <i>HSA Code of Practice for the Procurement, Design and</i></p>	<p>The Guidelines on the Procurement, Design and Management Requirements of the Safety, Health and Welfare at Work (Construction) Regulations 2013 are published. The Authority does not agree that this guidance document would be appropriate as a COP.</p>

Management Requirements of the Safety Health Welfare at Work (Construction) Regulations 2013 in order to update to reflect the Safety, Health and Welfare at Work (Construction) Regulations 2013, and to put it on the same footing as other Codes of Practice applicable to the Construction Industry including, but limited to the –

- Code of Practice for the Design and Installation of Anchors,
- Code of Practice for Working in Confined Spaces,
- Code of Practice - For Contractors with Three or Less Employees Working on Roads,
- Code of Practice for Avoiding Danger from Underground Services,
- Code Of Practice for Safety In Roofwork,
- ESB Code of Practice for Avoiding Danger from Overhead Electricity Lines,
- Code of Practice for Access and Working Scaffolds.

21. In the interests of transparency in general, and the transparency code and associated legislation in particular, the Authority should publish the communications, and submissions, on relevant matters made to it in advance this particular public consultation on the Draft 2017 Code of Practice for Access and Working Scaffolds, and any communications and submissions by the Construction Industry, in relation to the Safety, Health and Welfare at Work (Construction) Regulations 2013 (or previous versions thereof), or any proposed amendments to the HSA “Guidelines on the Procurement, Design and Management Requirements of the Safety Health Welfare at Work (Construction) Regulations 2006”.

22. The Authority should adhere to its own published consultation policy (<http://consultation.hsa.ie/consultation-process/policy.asp>) and ensure that each stage of the consultation process is completed prior to moving to the next stage.

23. The Authority should complete the consultation process for numerous other incomplete consultations e.g. invite parties making submissions to clarify matters relating to their submissions, and the publication of the outcomes of various public consultation prior to finalisation, and in advance of issuing finalised proposals for consideration by the Board of the Authority, and if necessary to the Minister.

The Authority’s consultation policy is being followed including publication.

As you are aware there was no public consultation on the updates made to the Guidelines on the Procurement, Design and Management Requirements of the Safety, Health and Welfare at Work (Construction) Regulations 2013.

The Authority’s consultation policy is being followed.

No comment. Not relevant to this consultation. Issues have been raised already in other correspondence.