# DAIRY UK GUIDANCE ON SAFE SYSTEMS FOR WORKING AT HEIGHT ON MILK TANKERS

*First edition – February 2015*

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***Legal Liability***

***While Dairy UK has made every effort to prepare this guidance in compliance with the requirements of current regulations and good industry practice, Dairy UK can accept no responsibility for the consequences of individual or corporate actions arising as a result of following the guidance. Specifically, Dairy UK does not accept any legal liability for any injuries, harm or other consequences arising from the interpretation given by companies to this guidance.***

***The possession of this guidance does not absolve companies from the requirement to create their own risk assessment approach document for working at height on milk tankers tailored to their own specific circumstances. This guidance is solely intended to give assistance in the creation of such a document and is not a training manual.***

# INTRODUCTION

## Content

**The best way to ensure safety is to avoid working at height (WAH) in the first place and your aim must be to achieve this wherever possible.**

**If, however, there remains no alternative to working at height in order to complete your task, then this guidance document offers you advice on the procedures that should be followed so that you can prevent falls and conduct the task in a safe and practical way to minimise the risk of injury.**

The structure of this guidance follows the current legal requirements under the Work at Height Regulations by following the hierarchy for managing risks from working at height, i.e. taking steps to avoid, prevent or minimise risks if colleagues are required to work at height. However, technical developments could provide further opportunities to minimise working at height in the future.

This guidance has been produced by Dairy UK through a working group drawn from Dairy UK's Occupational Health and Safety Committee and the Management Committee of the Dairy Transport Assurance Scheme.

The dairy industry recognises the need to reduce accidents from working at height on milk tankers and find solutions that minimise the reasons for accessing the top of milk tankers.

This requires companies to:

- identify opportunities to introduce new procedures that reduce the requirement for accessing the top of tankers;
- develop and implement appropriate safe systems for working at height on milk tankers.

This guidance:

- provides information on possible approaches to avoid working at height;
- provides guidance to hauliers on the development and possible content of a safe systems of work document covering working at height on milk tankers and is targeted towards tanker drivers and milk intake staff.

## Legislation

***The hazards associated with potential falls clearly dictate that the application of appropriate safety standards and risk management procedures is the priority issue for all parties involved. This will include loading/unloading, inspection, transportation, sample taking and maintenance operations. There are overall requirements and legal obligations for all parties to conduct risk assessments of operations, to reduce and/or minimise risks to protect all colleagues and to co-operate and co-ordinate their activities to comply with statutory requirements.***

***These include:***

- ***Management of Health and Safety at Work Regulations 1999***
- ***Work at Height Regulations 2005***

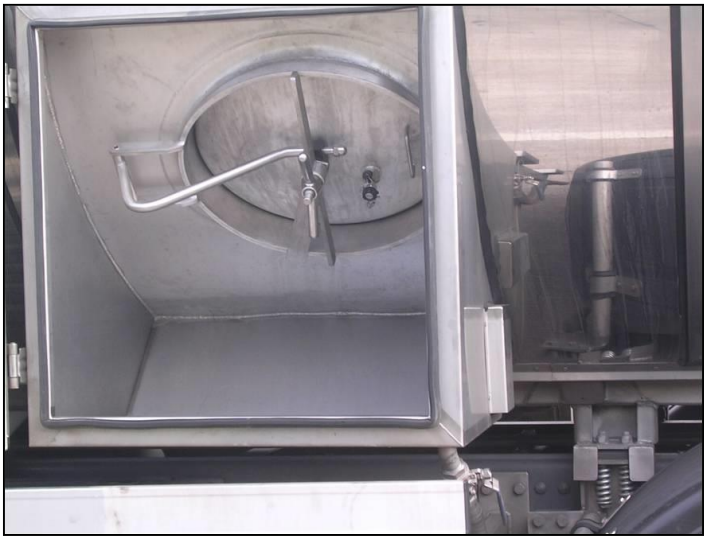
***This guidance does not replace these regulations, obligations or duties. Every party in the distribution chain must co-operate and work together to ensure that all colleagues are protected.***

***You must ensure that no work is done at height if it is safe and reasonably practicable to do it other than at height.***

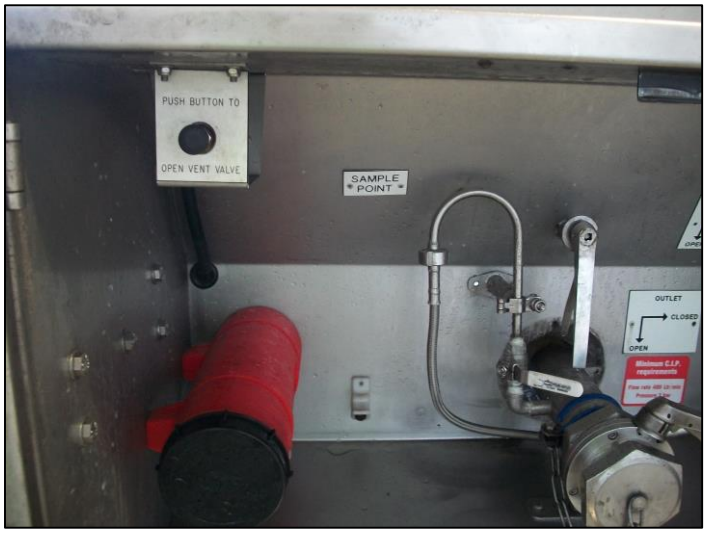
## ➢ *Avoiding the Need to Work at Height*

### ◆ Tanker Design Stage

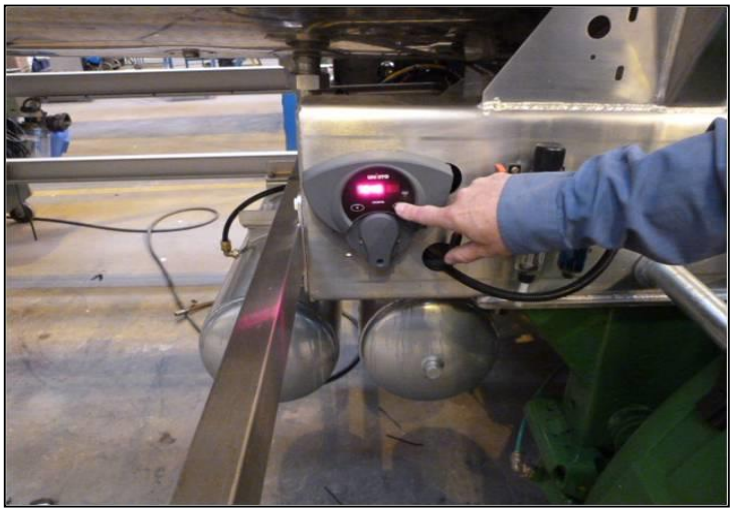
- ground level manway lids and ground level sample points;



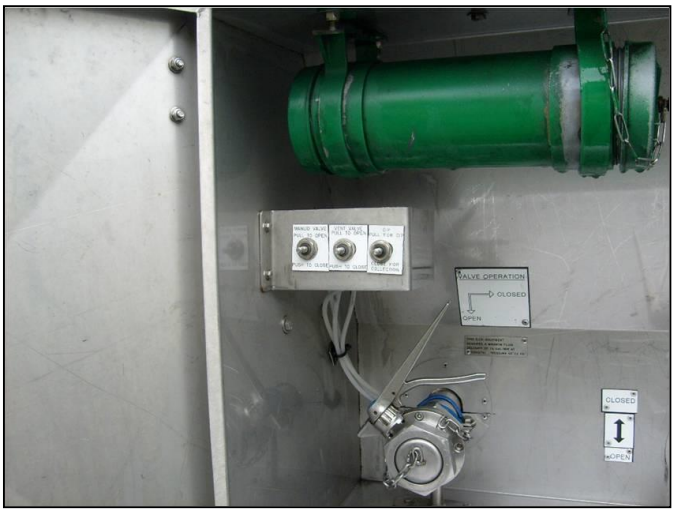
- ground level venting;



- ground level security.



- Modification/retrofit
  - relocating vent/ground level venting;




  - relocating sample taps

***Where avoidance cannot be met, these are some of the preventative measures that can be considered:***

## ➢ *Preventing Falls*

- fixed gantry

- portable gantry

- deployment of hand safety rails

***Your company should address the following areas:***

## ➢ *Authorisation*

Colleagues permitted to work at height on tankers should be authorised, trained, competent and the fact recorded.

The permitted reasons for accessing the top of tankers should be specified, e.g. venting, visual inspection, sampling, swabbing purposes and maintenance.

## ➢ *Risk Assessment*

A risk assessment should be prepared. This should identify potential causes of injury. These may include, but are not limited to:

- **Competence**

  ***Training***

  Colleagues who are not trained in the task of accessing tankers.

- **Capability**

  ***Focus***

  Over familiarity and lack of concentration.

  ***Incapacity***

  Fatigue/alcohol or drugs (prescriptive or otherwise).

- **Operating Environment**

  ***Lighting***

  Inadequate/defective lighting.

  ***Collisions***

  Injury caused by moving vehicle.

  ***Surface area***

  Slippery ground area because of spilt fluids; uneven broken ground creating trip hazards.

  ***Weather***

  High winds leading to instability, visual impairment and flying debris. Poor grip due to slippery steps on the ladder as a result of wet and icy conditions.

## Vehicle Safety

***Vehicle movement***

Tanker not properly secured.

***Inadequately vented tanker***

Tanker implosion and flying debris, e.g. manway lid.

## Safety and Access Equipment

***Safety and Access Equipment***

Inadequate provision of appropriate safety and access equipment.

E.G. PPE, gantry, fall arrest, harnesses, carrying equipment

***Defective safety equipment***

Damaged or improperly maintained equipment.

***Incorrect deployment of access equipment***

E.G. gantry ladder not being raised up/released down correctly.

***Defective access equipment***

E.G. ladder or handrails failing.

***Incorrect use of access equipment***

E.G. Persons not using ladders etc. properly and inappropriate method of work on top of the tanker.

Having assessed possible risks to minimise the distance and consequences of a fall, the Safe Systems of Work document should then consider the risks identified and control measures. These may include, but are not limited to:

- **Competence**

  Clear limitations should be set on which colleagues can be permitted to access tankers, i.e. those that have undergone training.

  An appropriate training programme needs to be developed along with the process of documenting training and refresher training.

- **Capability**

  The obligation on colleagues to notify line management of potential incapacity, e.g. due to medical conditions and prescriptive drugs, needs to be clearly set out and the method by which this is communicated and the message reinforced. Colleagues must also refer to their company's existing drugs and alcohol policies

  The reinforcement of the importance of appropriate procedures and the need to concentrate also has to be set out, e.g. refresher training, warning signs, random inspections, disciplinary procedures, etc.

- **Operating Environment**

  ***Lighting***

  Your safe systems of work should clearly identify which locations/conditions tanker access should be undertaken e.g. specified areas with adequate lighting, use of lighting gantries etc.

  ***Collisions***

  There should be a clearly identified procedure for reducing the risk of collisions either by:

  - only permitting access in specified suitable locations;
  - effectively demarcating the tanker from moving vehicles.

  ***Surface area***

  This should be addressed either by:

  - designating defined areas for tanker access;
  - defining adequate levels of surface grip, e.g. ground should be even, unbroken and provide firm traction/grip.

  ***Weather***

  Procedures should be set out to address adverse weather conditions, e.g. ice, heavy rainfall, heavy snow, high winds.

- **Vehicle Safety**

  The document should set out the procedure for securing the tanker against movement and keeping it secured e.g. removal of keys, passing keys to specified colleagues/locations.

  The process for adequately venting tanks should be in place.

## Safety and Access Equipment

### *Safety and Access Equipment*

- Where PPE is provided, operators should be aware of pre-use checks, cleaning, limitations and correct storage prior to use. All defects must be reported to a Supervisor immediately.

- Safety harness

- Tool belt

- Fall arrest system

***Defective safety equipment***

Ensure equipment is properly maintained and not damaged.

***Incorrect deployment of safety equipment***

Ensure all safety equipment is properly deployed.

***Defective access equipment***

Conduct regular inspections of safety equipment.

***Incorrect use of access equipment***

Ensure individuals using access equipment are adequately trained for their use.

## *ACCESS AND EGRESS TO A TANKER WORK PLATFORM*

In the absence of a built in or fixed gantry, the next course of action is using a ladder and the following guidance should be followed:

- **Contact points**

  Maintain three points of contact at all times on the ladder.

- **Footwear check**

  Ensure the soles and heels of shoes are clean and have adequate tread.

- **Ground surface check**

  Ensure the ground surface is free from potholes/trip hazards and has adequate lighting.

- **Orientation towards the ladder**

  Require colleagues to keep facing the ladder at all times whilst climbing.

- **Keeping hands free**

  Prohibit the carrying of anything in the hands whilst climbing to maintain three points of contact, e.g. by using a tool belt.

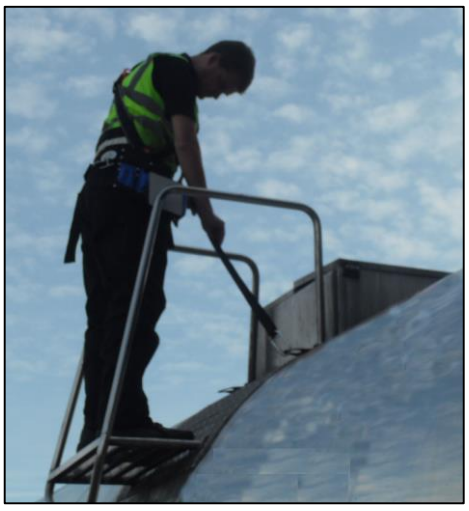
- **Use of ladder rails**

  Check the integrity of the ladder rail and steady the body before placing the foot on the bottom rung of the ladder.

- **Climbing the ladder**

  Pull the body up using the ladder rails so that the next foot can be placed on the next rung of the ladder whilst checking the integrity of the step before placing full body weight on the next rung.

  Make sure that you are attached to the tanker when you have reached the top of the ladder.



- **Concentration**

  The importance of not being distracted when accessing/egressing top of tank, e.g. answering a mobile phone.

### *At the Top of a Tanker Work Platform;*

**Consideration should be given to the following:**

- how the tasks should be carried out;
- appropriate position for particular types of tankers;
- when it is permitted to stand: presence of handrails, width of gantry/walkway;
- safety and access equipment; to prevent any falls from height
- prohibition of walking on the tanker.

### *Egressing from a Tanker Work Platform:*

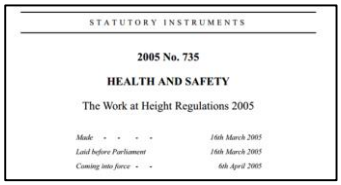
- three points of contact: maintaining three points of contact with the ladder at all times;
- feet placement: placing both feet on the working platform;
- descent: firmly grasping the handrail with both hands and descending the ladder one rung at a time. Jumping must be prohibited;
- orientation: facing the ladder at all times;
- landing area inspection: visual inspection of the landing area before stepping off.

## SOURCES OF FURTHER INFORMATION

***Some of the other publications which are available for additional guidance include:***

***Health and Safety Executive (HSE) Working at Height microsite***

http://www.hse.gov.uk/work-at-height/index.htm


STATUTORY INSTRUMENTS

2005 No. 735

HEALTH AND SAFETY

The Work at Height Regulations 2005

Made - - - - 16th March 2005
Laid before Parliament 16th March 2005
Coming into force - - 6th April 2005

***The Work at Height Regulations 2005***

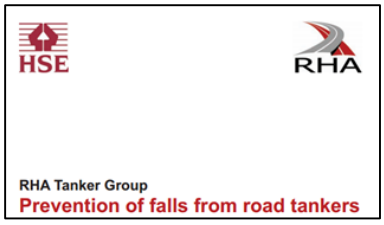
http://www.hse.gov.uk/work-at-height/the-law.htm

***HSE: The Work at Height Regulations 2005 (as amended)***
http://www.hse.gov.uk/pubns/indg401.htm

***Working at Height – A brief guide***
http://www.hse.gov.uk/pubns/indg401.pdf

***Safe use of ladder and stepladders – A brief guide***
http://www.hse.gov.uk/pubns/indg455.pdf

***Preventing falls from vehicles – Advice for workers***
http://www.hse.gov.uk/pubns/indg413.pdf




***HSE/RHA Tanker Group: Prevention of falls from road tankers***

http://www.rha.uk.net/ContentFiles/RHA%20Prevention%20of%20Falls%20from%20Road%20Tankers.pdf

***Freight Transport Association: Preventing Falls from Vehicles (An industry guide)***

http://www.fta.co.uk/export/sites/fta/_galleries/downloads/workplace_transport_safety/preventing_falls_from_vehicles.pdf

***Freight Transport Association: Health and Safety (FTA Support Guide)***

*http://www.fta.co.uk/export/sites/fta/_galleries/downloads/health_and_safety/health_and_safety_support_guide.pdf*

This guidance document has been produced by members of the Dairy Transport Assurance Scheme (DTAS) Management Committee and members of the Dairy UK Occupational Health and Safety Committee.
*http://www.dairytransport.co.uk/*