

SAFETY IN DRIVER ONLY COMMERCIAL WASTE AND RECYCLING COLLECTIONS

This WISH information document is aimed at health and safety improvements in the waste management industry. The Health and Safety Executive provided support to WISH in producing this guidance. This guidance may go further than the minimum you need to do to comply with the law with regard to health and safety

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Introduction and scope

This information is aimed at, but not limited to, managers, supervisors and employees of commercial and industrial waste and recycling collection services that may use vehicles operated by a driver only. The activities undertaken are likely to be through the use of rigid vehicles that collect waste and/or recycling at the kerbside or at customer premises (e.g. Trade Waste Vehicles – Front End Loader (FEL); refuse collection vehicles (RCVs); Roll on-Roll off (Ro- Ro); Skip vehicles).

The information is about assessing the risks when collecting waste and recycling from commercial/industrial premises to determine whether “driver only” operations are appropriate, and the risks can be adequately managed. It deliberately focuses on:

- Vehicle issues (but comments on other issues)
- Activities in public access areas (e.g. commercial premises, car parks, industrial sites, schools / colleges etc.)

The advice in this information sheet should be read in conjunction with:

- WISH WASTE 04 Waste and recycling vehicles in street collection
- WISH WASTE 23 Safe waste and recycling collection services

Many of these issues will require good liaison and cooperation between those involved (e.g. clients, contractors, employees, unions, recruitment agencies).

Assessing the risks

The servicing organisation (the employer) should carry out a risk assessment at each customer's site and bin collection/delivery point. This will help to determine and identify whether "driver only" operations are appropriate.

When should the risk assessment be carried out?

The assessment of the potential customer's site should be carried out prior to the start of the contract. It should be reconfirmed to ensure all hazards have been identified when the containers are being delivered as the delivery operative should be familiar with the vehicle being used. If at this point further controls are needed the servicing contract manager will liaise with the customer on actions to be taken.

Who should carry out the risk assessment?

Those carrying out risk assessments should have received training such that they understand the hazards from the perspective of the driver and others who may be affected (e.g. other road/footpath users). Drivers, managers and customers may need to be consulted to help ensure that hazards are identified.

The assessment may be carried out by one person or by a team e.g. involving the sales representative, driver and supervisor/manager.

The risk assessment process

The assessment should begin with an information gathering exercise. The table in Appendix 1 provides an example of the potential hazards and control measures for this type of activity *[Note: The information in the table may assist employers develop their own customer risk assessment form as part of the risk assessment process].*

If the initial assessment is carried out by a member of the sales team, the importance of the involvement of the driver, supervisors/managers and the person locally managing the collection point area is paramount.

This information should be recorded in order that the supervisor/manager can determine whether adequate controls are in place prior to the first collection/delivery.

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The assessment should be reviewed by the driver prior to and during the first collection/delivery to confirm that no additional hazards are present, and the assessment is a true reflection of the hazards and that adequate controls are in place. Any concerns should be reported to the supervisor/manager.

The drivers should be made aware of the hazards and controls at each site through the provision of suitable instructions/procedures/guidance (e.g drivers round sheet) and training.

Review of risk assessment

The risk assessment should be reviewed regularly throughout the operation of the contract. This can be via:

- Driver feedback / near miss reporting
- A robust de-briefing process
- Supervision and monitoring
- Following an Incident
- Upon customer notifying servicing organisation of site condition changes
- Upon customer notifying servicing organisation of relocating container collection points

Where further risks are identified, the risk assessment should be reviewed.

Unplanned collections

Occasionally there may be a requirement to undertake an extraordinary, unplanned (spot) collection from a customer premises. Under such circumstances it is essential that:

- A risk assessment is carried out (with the aid of the employer's risk assessment form)
- The person (the driver) carrying out the risk assessment has received adequate training
- Other relevant parties (e.g. the person locally managing the waste collection point) are consulted if necessary
- Adequate controls are put in place
- Drivers are instructed that if there is any concern about the safety of the collection that the work should not be undertaken

What should be recorded?

The results of the assessment should be recorded, together with details of any suitable and sufficient control measures that have been identified as being necessary.

Training requirements driver only collections

Drivers, including agency drivers, should be competent to work safely when collecting commercial/trade waste. They should be able to identify hazards and take appropriate action, as they will often encounter new circumstances and unplanned/unknown hazards. Where drivers may be asked to undertake unplanned collections, they should be competent to assess the risks associated with doing so using checklists, forms and similar provided by the employer. Driver CPC training and ongoing assessments of driver competence will ensure that operational training is current. However, it is good practice to provide specific refresher training in relation to 'driver only' operations to cover safe working practices and vehicle manoeuvring using new technologies such as all-round vision cameras, reversing aids, etc.

Individual capability

In selecting personnel for proposed "driver only" operations, due consideration should be given to the following:

- The physical capability of drivers relative to increased manual handling operations required by "driver only" operations
- The ability to adjust to the scheduling of the collection round and shift patterns (early and late collections/deliveries)
- The attitude of the drivers chosen to undertake "driver only" operations relating to their ability to self-supervise effectively and to be suitably and sustainably risk aware

Note - The practice of offering financial inducement to staff to engage in 'driver only' operations in the absence of thorough and complete risk assessment is unacceptable. Measures should also be put in place to ensure that drivers are protected from repercussions should they decline to undertake a collection on the basis of reasonable safety concerns (even if those safety concerns are later determined to be unfounded).

Remote workers and communication

Drivers should be given clear, unambiguous information and instructions about the control measures required at the collection/delivery points.

Where further hazards are identified by the driver, these should be reported to the supervisor/manager via either a robust de-briefing process or a safety concern report (near miss report). These will require re-assessment of the location with feedback given to the driver.

Drivers should be provided with a communication system set up between supervisor and colleagues. For example, the driver should be provided with a phone or radio device to allow for effective communication and reporting in times during the working day.

Supervision and monitoring

Monitoring of “driver only” collections should be carried out on a regular basis to check that the controls identified in the risk assessment are being followed. This may be by “spot checks” or using live feeds or recorded material from on board cameras.

It is also good practice for the sales/commercial team of an organisation to visit their client base to ascertain whether there is a requirement to undertake a review of a premises risk assessment prior to any scheduled contract or risk review.

Worker engagement

It is regarded as good practice that in addition to a robust de-briefing process, collections staff are included in regular team meetings / briefs, Health & Safety Committee Meetings etc. and afforded a platform to both air any concerns and receive feedback on the responses to previous issues / concerns raised relating to “driver only” operations.

Close attendance to vehicles (vehicle security)

Employers as part of the risk assessment process should identify if there is a cause or situation whereby a vehicle is to be left unattended by the driver in order to carry out the collection activity. Left unattended in this circumstance relates to going out of sight of the vehicle for any period of time or greater than 5m away.

If a situation occurs where the driver is to be out of sight of the vehicle the driver is to switch off the engine, effectively apply the parking brake, remove the keys and lock the cab whilst bringing the waste containers to the rear of the vehicle. Once at the rear the driver can then insert the keys if required in order to operate any ancillary equipment fitted to the vehicle.

During the risk assessment process employers should consider the area collections are undertaken and establish if further controls are needed such as RFD systems requiring a tag to be presented before engaging a gear on the vehicle. This may be appropriate if a vehicle is used in a heavily populated area where criminal or terrorist activity could be foreseen.

All vehicles left unattended at any time must be positioned where they are not endangering any person, property or other road users.

Further information can be found in section 107 of the Construction & Use Regulations 1986.

Additional safety/control measures

When engaged in the procurement of new vehicles or the modification of existing vehicles and equipment, the following matters relating to 'driver only' operations should be considered:

- Enhanced all-round vision capability
- Low-entry cabs to reduce fatigue
- The positioning of equipment controls relative to all round visibility of the operator during "driver only" operations
- Means of emergency communication
- Procedure for inspection of waste containers i.e. condition of and potential rough sleepers

Disclaimer and WISH

This information document has been prepared by health and safety practitioners to assist health and safety improvements in the waste management industry. It is endorsed by the WISH (Waste Industry Safety and Health) Forum. This information document is not formal guidance and represents good practice, which typically goes beyond the strict requirements of health and safety law.

Nothing in this information document constitutes legal or other professional advice and no warranty is given nor liability accepted (to the fullest extent permitted under law) for any loss or damage suffered or incurred as a consequence of reliance on this document. WISH accepts no liability (to the fullest extent permitted under law) for any act or omission of any persons using this document.

This information document is not a substitute for duty holder and/or professional safety advisor's judgment. Notwithstanding the good practice in this document, duty holders are responsible for ascertaining the sufficiency and adequacy of their internal and independent procedures for verifying and evaluating their organisation's compliance with safety law.

The Waste Industry Safety and Health (WISH) Forum exists to communicate and consult with key stakeholders, including local and national government bodies, equipment manufacturers, trade associations, professional associations and trade unions. The aim of WISH is to identify, devise and promote activities to improve industry health and safety performance.

Useful links and further reading

WISH WASTE 09 Safe transport in waste management and recycling facilities

WISH WASTE 04 Safe use of waste and recycling vehicles in street collection

WISH WASTE 23 Safe waste and recycling collection services

WISH INFO 10 Safe use of refuse collection vehicle bin lifters and bins

WISH INFO 12 Reversing in waste recycling collection

WISH REF 01 Example daily periodic check sheets for street collection vehicles

WISH REF 02 Case Studies bin lifters and bins on waste vehicles

WISH REF 03 Example refuse recycling collection round data sheet

WISH REF 04 Example format driver assessment

All WISH publications are available from the WISH web site as free downloads.

Waste Industry Safety and Health (WISH) Forum can be found at <https://wishforum.org.uk/>

HSE's waste website: www.hse.gov.uk/waste

Appendix 1 example driver only risk assessment

Note: The below is simply an example. You should not just copy this and use it. You need to make your own decisions, however, the below may assist you in this.

Site issues	Yes	No	Control measures	Comments
Are there site rules?			Driver to be made aware of site rules before/at first collection/delivery	
Does the site have induction requirements?			Induction to be carried out before/at first collection/delivery	
Are there specific PPE requirements on site?			Correct PPE made available and worn	
Is there a speed limit?			Driver to be made aware of before/at first delivery	
Are there time restrictions for collections/deliveries?			Driver to be made aware of before first delivery	
Is there a traffic management plan for the site			Driver to be made aware of site traffic plan before first collection	
Are other vehicles are likely to be on site during collection			Restrict from the collection activity	
Are there likely to be pedestrians? [<i>numbers, time of day, footpaths available</i>]			<ul style="list-style-type: none"> • Time restricted collections to avoid pedestrian • Repositioning bins away from pedestrians • Exclusion zones during collection/delivery 	
Are there vulnerable persons nearby? [<i>children, patients, elderly</i>]				
Are there footpaths for pedestrians? [<i>width, available both sides road, crossing points</i>]				
Access for LGV/HGV				
Reversing - Is there a need for : <ul style="list-style-type: none"> o reversing on site? o reversing onto main road? o a long reverse? 			<ul style="list-style-type: none"> • Can the need for reversing be eliminated e.g. use of a smaller vehicle (which can turn in a smaller space and is more suitable for narrow access)? • Organise route to minimise reversing • Additional crew member to assist with manoeuvring and reversing (trained reversing assistant or banksman) • Exclusion zones during collection/delivery • Use of additional safety aids such as cameras, radar etc • Reassess collection/delivery method 	
Are there narrow roads/tracks?				
• Is there good lighting?				
• Is there good visibility? [<i>overgrown bushes/trees, bends, parked cars</i>]				
• Are there overhead obstructions? [<i>e.g. power lines, trees, bridges</i>]				
• Are the ground conditions adequate? [<i>uneven surfaces, prone to flooding/ice</i>]				
• Are there steep slopes?				
Manual Handling and Unauthorised access to vehicle				
<ul style="list-style-type: none"> • Is it a long distance from vehicle parking area to collection/delivery point? [<i>Manual handling ground conditions, steep slopes, side waste</i>] • Is the vehicle a long distance from office [to get paperwork signed]. 				