SAFE CLEANSING ON THE HIGHWAY
MANAGING THE RISKS ASSOCIATED
WITH MANUAL AND MECHANICAL
CLEANSING

This guidance has been developed by the Waste Industry Health and Safety (WISH) Forum to help control safety and health risks in the waste management industry associated with safe cleansing on the highway. The Health and Safety Executive (HSE) was consulted in the production of this publication. It endorses the sensible, proportionate, reasonable and balanced advice to owners on managing the risk from this guidance during the waste-related activities as set out in the guidance.

This guidance is aimed at those responsible for the design, specification, operation, management, and monitoring of cleansing operations on the highway. It primarily focusses on traffic related issues associated with manual and mechanical cleansing including secondary cleansing, more commonly referred to as litter picking. It contains advice relating to good working practice that spans all aspects of the cleansing operations including temporary traffic management operations where required. It is not intended to be exhaustive and the guidance will point the user towards other relevant guidance that is freely available. It also includes broader management and monitoring issues, as well as the supervision and training of staff.
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Disclaimer and WISH

Note – this guidance is supported by five WISH information sheets. You should read this guidance in conjunction with the supporting information sheets:

- WISH INFO 14 Working on the public highway (street cleaning) - monitoring
- WISH INFO 15 Working on the public highway (street cleaning) - PPE
- WISH INFO 16 Working on the public highway (street cleaning) - risk assessment
- WISH INFO 17 Working on the public highway (street cleaning) - signage
- WISH INFO 18 Working on the public highway (street cleaning) - vehicles

These information sheets are free to download from the WISH web site.
1. Introduction

This guidance has been produced by the Waste Industry Safety and Health (WISH) Forum. In compiling this guidance WISH is grateful for the significant contribution made by the Environmental Services Association (ESA) and a number of other prominent individuals and private and public sector bodies.

It is targeted at clients in control of contracts, those who specify contracts, and employers who operate the services. It will also help managers and supervisors design and operate services to reduce the risks to operatives involved in the work and other road users, so far as is reasonably practicable.

This guidance applies to, and will assist, those managing or organising local cleansing activities as part of parish, charitable or similar cleansing schemes involving community workers and other volunteer members of the public.

Due to the extensive range of work scenarios that fall within the scope of cleansing highways it is not possible to provide specific guidance to cover every eventuality. As a result, the guidance is intended to be an umbrella document which places a heavy emphasis on duty holders carrying out suitable and sufficient risk assessments prior to undertaking all work activity. Where appropriate, the best available and most relevant guidance available to duty holders is signposted to assist in deciding what measures (if any) they need to take.

Useful definitions and terminology

Some useful definitions and terminology used in this guidance are:

- **“Cleansing”** means the collection and removal of litter and detritus
- **“Secondary Cleansing” or “Litter Picking”** means the collection removal of litter and small items of waste
- **“Litter”** means improperly discarded waste including items up to a predetermined weight and volume
- **“Detritus”** means small, broken down particles of synthetic and natural materials including dust, mud, soil, grit, gravel, stones, rotted leaf and vegetable residues, and fragments of twigs, glass, plastic and other finely divided materials
- **“Carriageway”** means that part of the road or highway constructed for use by vehicular traffic.
- **“High-speed road”** means a single or dual carriageway road which is subject to a permanent speed limit of 50 mph or more
- **“Highway”** means the area between the boundary fences including verges, shoulders, medians, footways, cycle tracks and carriageways (see Figure 1)
“Sideways Safety zone” means that area between the working space and the traffic lanes occupied by vehicles that is necessary to protect the workers (see Table 2).

“Single carriageway”, means a road that has one carriageway for travel in two directions or one direction in the case of a one-way road.

“Dual carriageway Road”, means a road which comprises a central reservation and two separate carriageways for travel in opposing directions. This includes motorways. An “all-purpose dual carriageway road” means a dual carriageway road which is not a motorway.

“Competent” means having:
- Relevant knowledge, skills and experience
- Ability to apply these, but recognise the limits of your competence, and
- Necessary training to acquire and maintain your competence

The components that make up a typical highway are shown in Figure 1.

![Figure 1: Typical highway layout (kerbs and gutters/channels not included)](image)

2. Assessing the risks

It is a legal requirement for every employer and self-employed person to make an assessment of the health and safety risks arising out of their work. The purpose of the assessment is to identify what needs to be done to control health and safety risks. Regulation 3 of the Management of Health and Safety at Work Regulations 1999.
Before any work commences the site (the highway where the proposed activity will take place), and the activity itself, should be risk assessed by a competent person to ensure that proportionate and reasonably practicable control measures are put in place.

Undertaking cleansing operations on the highway may expose operatives to many types of hazard that have the potential to cause death or serious injury to them, or other road users. The most significant risk to operatives and other personnel who may be associated with the works is being struck by a third party vehicle. Moving vehicles, plant or equipment, associated with the works, particularly when reversing, can also present the risk of being struck.

For all activities it is possible that circumstances could quickly change as the work progresses. Supervisors and operatives should receive training in dynamic risk assessment to ensure they are capable of adapting to the changing needs such as visibility changes caused by weather.

Timing activities when traffic flows are least hazardous can be an important risk control measure if properly managed.

When planning a traffic management scheme the opportunities for joint working should be considered by all authorities who have a responsibility for the highway. For example, the opportunity for cleansing of the highway could be taken when other maintenance work is taking place. This will reduce the risks to operatives and road users as well as having logistical and financial benefits. The sharing of information about closures and planned work between authorities who have a responsibility for the highway is important to the overall minimization of road risk to workers.

All risk assessments should be reviewed on a periodic basis as the working environment can change over time. They should also be reviewed following an accident or a dangerous occurrence (near miss).

There may be occasions when a risk assessment identifies that it may still be too dangerous to operate on the highway with live traffic flows and in those circumstances, the only suitable control measure would be to close the road. Similarly there may be occasions where ongoing, dynamic, risk assessment identifies that it may have become too dangerous to continue operations on the highway with live traffic flows. In those circumstances the only suitable course of action would be to cease the activity.

More guidance on risk assessment can be found in the “Before you start” section of the “Safety at Street Works and Roadworks” see below; and more generally www.hse.gov.uk/risk.
3. Measures to eliminate or reduce risk

The first step in deciding what risk control measures should be applied (if any) is to conduct a suitable and sufficient risk assessment. If that assessment identifies significant risks associated with the work the best available and most relevant guidance should be utilised by duty holders to decide on the appropriate control measures that should be implemented.

If the assessment identifies significant road/traffic risks associated with the work then the best and most relevant guidance for traffic management issues is likely to be found in: The Traffic Sign Manual: The Traffic Safety Measures and Signs for Road Works and Temporary Situations, commonly referred to as Chapter 8, and The ‘Safety at Street Works and Road Works’ produced by the Department of Transport, commonly referred to as the Red Book. See also References and further reading. Chapter 8 defines road works in Clause D1.5.3 as "any works or temporary restrictions that cause partial or total obstruction of any road or highway, whether on the verge, hard shoulder, footway, cycleway, bridleway or carriageway. Examples may include highway improvement schemes, excavations, structural or maintenance works of any kind, street works or any other work executed on or near the highway together with the necessary working space, safety zones, space required for the storage of any materials, the construction of any temporary structures and the operation of any constructional plant required for the execution of such work, including associated surveys and inspections”.

After consideration and consultation WISH has formed the view that, for the purposes of this guidance, where a risk assessment identifies that there are road related risks that need to be controlled in relation to activities such as litter picking; road sweeping; and other associated street cleansing activities the appropriate standard for those controls are set out in the guidance documents in references and further reading and Table 1.

The Chapter 8 and the Red Book do not explicitly apply to activities such as litter picking, nor do they explicitly exclude themselves from applying to them. However, for most activities the principles, approach, and standards that Chapter 8 and the Red Book sets out would be the most appropriate standard to be considered.

The standards described in Chapter 8 and the Red Book should only be applied to street cleansing activities proportionate to the risks involved in the activity. It does not necessarily follow that all of the provisions of Chapter 8 or the Red Book should be applied to every highway related cleansing activity. As an example, the collection of litter alongside a motorway or dual carriageway should be undertaken in accordance with the standards set in Chapter 8 and, or, the Red Book code of practice, as is appropriate, and as modified by IAN 115/08. At the other end of the spectrum, a risk assessment may identify that little needs to be done when street cleansing in a low risk environment such as a quiet residential cul-de-sac.
Waste Industry Safety and Health Forum

The applicability to all road configurations and the primary guidance available is summarised in Table 1. Note that Chapter 8 is applicable to roads of all speeds.

**Table 1 - Highway configurations and associated guidance**

<table>
<thead>
<tr>
<th>Configuration</th>
<th>Speed</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single Carriageway*</td>
<td>30 mph or less</td>
<td>Safety at Street Works and Road Works, A Code of Practice</td>
</tr>
<tr>
<td>Single Carriageway*</td>
<td>40 mph</td>
<td>Safety at Street Works and Road Works, A Code of Practice</td>
</tr>
<tr>
<td>Single Carriageway*</td>
<td>50 mph or more</td>
<td>Safety at Street Works and Road Works, A Code of Practice</td>
</tr>
<tr>
<td>Dual carriageway*</td>
<td>40 mph or less</td>
<td>Safety at Street Works and Road Works, A Code of Practice</td>
</tr>
<tr>
<td>High Speed dual carriageway*</td>
<td>50 mph or more</td>
<td>Chapter 8 and IAN115/08</td>
</tr>
</tbody>
</table>

*For the definitions of carriageway types see sections above.

When working on the highway a minimum amount of space must be maintained from the edge of the working space (nearest to live traffic) and the moving traffic. This area is referred to as the sideways safety zone. Table 2 shows the appropriate sideways safety zone from the Red Book for each type of road. No work should take place inside the sideways safety zone. No vehicles or equipment should be parked or stored in the sideways safety zone.

**Table 2: Safety zones**

<table>
<thead>
<tr>
<th>Type of highway</th>
<th>Sideways Safety Zone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single carriageway road, Restricted to 30 mph or less</td>
<td>0.5 Metres</td>
</tr>
<tr>
<td>Single carriageway road, restricted to speeds of 31 mph to 40 mph inclusive</td>
<td>0.5 Metres</td>
</tr>
<tr>
<td>All-purpose dual carriageway road restricted to 40 mph or less</td>
<td>0.5 Metres</td>
</tr>
<tr>
<td>Single carriageway road, with speed limit of 50 mph or more</td>
<td>1.2 Metres</td>
</tr>
<tr>
<td>All-purpose dual carriageway with a speed limit of 50 mph or more</td>
<td>1.2 Metres</td>
</tr>
</tbody>
</table>
Many rural villages will have narrow footpaths and pedestrian access areas alongside roads such that operatives working on those footpaths would be within the sideways safety zones described above. Whilst it may be possible for cleansing activities to take place using those footpaths, such work activities should be treated with the level of caution that befits their hazardous nature. They should be subject to separate, individual, risk assessment and may require either exceptional further risk controls, or lane closures before work can safely take place.

It is recognised that lane closures of narrow lanes can introduce additional risks to road users. When assessing the risk of cleansing activities at such locations regard should be given to the overall level of risk posed to all persons, whilst ensuring that this does not result in unacceptable levels of risk to any specific group of persons.

The work may also include risks other than those associated with traffic and they fall outside the scope of this guidance. Examples include manual handling, exposure to potentially hazardous substances or biological agents and exposure to sharps. Further information on these issues can be found on the HSE website at www.hse.gov.uk or on the WISH website.

4. Training

All staff must be appropriately trained for the work they are required to undertake. For cleansing operations there will be a range of activities (manual handling, COSHH, reversing vehicles CPC Driver Training, first aid etc.) where appropriate training would be required and these are beyond the scope of this guidance. Where a risk assessment indicates that temporary traffic management (TTM) is required the following applies:

Companies that work on Highways England (Welsh Government and Scottish Parliament) owned roads and supply services covered by the National Highways Sector Schemes (NHSS) have a contractual requirement (i.e. ‘Specification for Highway Works’) to be registered to the relevant Sector Scheme.

For operatives who undertake work on the highway under these circumstances they must be trained in accordance with an accredited training scheme as shown in Table 3.
Table 3: UKAS National Highway Sector Schemes

<table>
<thead>
<tr>
<th>Scheme 12A</th>
<th>Sector Scheme for Installing, maintaining and removing static temporary traffic management on motorways and high speed dual carriageways for schemes incorporating contraflow operations and/or temporary road markings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scheme 12B</td>
<td>Sector Scheme for static temporary traffic management on motorways and high speed dual carriageways for schemes not incorporating contraflow operations and/or temporary road markings</td>
</tr>
<tr>
<td>Scheme 12C</td>
<td>Sector Scheme for Mobile Lane Closure Traffic Management on Motorways and Other Dual Carriageways</td>
</tr>
<tr>
<td>Scheme 12D</td>
<td>Sector Scheme for Installing, Maintaining and Removing Temporary Traffic Management on Rural and Urban Roads</td>
</tr>
<tr>
<td>Scheme 18</td>
<td>For the Environment and Landscape including Ecology</td>
</tr>
</tbody>
</table>

For operations on similar roads which are not the responsibility of the Highways England, Welsh Government or Scottish Parliament e.g., where a Local Authority acts as the Highway Authority, equivalent standards should be adopted.

Operatives that are not undertaking traffic management tasks need not be trained in the applicable sector schemes. However, it is recommended that operatives working within the confines of a traffic management operation are trained to level 12DT1 (or equivalent) to ensure that they have a basic understanding and awareness of the risks they may face whilst working on the highway. A minimum ratio of one trained to one untrained operative is recommended.

All Drivers must hold an appropriate license for the vehicle that they are driving. Driving Licenses should be checked on a regular basis to ensure that there driver has not had a change in status.

**Rural and Urban Carriageways**

Operatives undertaking traffic management must be trained to the relevant UKAS National Highway Sector Scheme 12D standard (or equivalent) as shown (Table 4).
Table 4:- Training requirements for operatives for the varying types of traffic management related to rural and urban carriageways.

- It is recommended that litter picking operatives are trained to the level of 12D T1 of the national sector schemes, signing and coning for works on rural and urban single carriageways (or equivalent) to ensure they have a basic understanding and awareness of the risks.
- All drivers or operatives are conducting activities referred to in Chapter 8 they must conform to the physical standards set out in Chapter 8.
- A minimum ratio of one trained to one untrained operative.
- It is recommended that organisations should ensure that at least one person per operational region is trained to 12D T6 Supervisory Responsibilities; and at least one person in the company is trained to 12D T7.
High Speed Dual Carriageways and Motorways (speed limit 50mph or more)

- For high-speed dual carriageways and motorways all Operatives undertaking traffic management must be trained to the relevant UKAS National Highway Sector Scheme standards
- For full lane closures Traffic Management Operatives must be trained to the UKAS National Highway Sector Scheme standards of 12A and 12B. The Organisation must ensure that a qualified Traffic Safety and Control Officer or adequately trained and competent person is available to assist with the design and operation of the activity
- For Mobile Lane Closures Traffic Management Operatives must be trained to the UKAS National Sector Scheme Standard 12C. For a Mobile Lane Closure Operation to take place the Organisation must have access to a fully qualified Planning Officer to assist with the activities
- Unless a specialist division is present within the organisation undertaking the work, it is recommended that a specialist Traffic Management company is contracted to undertake the traffic management on high speed dual carriageways or motorways

5. Personal protective equipment

Operatives and drivers undertaking traffic management operations must wear appropriate personal protective equipment (PPE). The PPE required will be identified following a comprehensive risk assessment. It is likely that an adequate assessment will include the following:

- BS EN ISO 20471 Class 2 High Visibility vest is the minimum standard for all staff engaged in cleansing operations and must be worn at all times
- BS EN ISO 20471 Class 3 High Visibility jacket (long sleeve) is required for work on any live traffic lane (i.e. outside the working space of a closure) High visibility trousers should also to be worn on higher risk roads to increase visibility. Individual risk assessments may indicate that Class 3 standard, and the use of high visibility trousers (BS EN ISO 20471 Class 1), is applied to other highway activity. In Scotland and Wales High visibility jackets are to have full sleeves (unless a risk assessment shows that full sleeves would present increased risk, in which case three quarter sleeves are appropriate) for work on all roads
- Steel toe cap and mid-sole protected work boots to BS EN 345 s2
- Suitable protective safety gloves that can provide suitable protection in dry and wet weather.
- Some operators may also stipulate a protective helmet with chinstrap and visor (helmet to BS EN 397: 2012)
6. Vehicles

Guidance on the appropriate standard for all vehicles involved in working on the highway is set out in the guidance to Chapter 8. As applicable to the highway type:

- Vehicles shall be conspicuously coloured (e.g. Yellow or White), and have a High Visibility rear (e.g. Red/Yellow striped chevrons)
- Red reflective markings shall be applied on the inside edge of all rearward opening doors;
- All Highway Maintenance vehicles shall display a ‘740’ highway maintenance sticker on the rear, OR, the alternative light arrow sign in accordance with Chapter 8 section 10.8, OR chevron markings composing alternate strips of fluorescent orange-red retroreflective material and fluorescent yellow non-retroreflective material, of not less than 150mm each inclined at 45-60° to the horizontal and pointing upwards, OR a solid block of fluorescent orange-red retroreflective
- Vehicles shall be equipped with twin independent warning beacons, which must be visible from 360 degrees
- Lights and beacons shall be switched on when an operation is taking place and switched off once the operation has ceased. If working at night, work lights shall be fitted to the vehicle and must be used
- Vehicles shall carry an appropriate ‘610’ directional arrows and ensure that they are covered or removed when the operation has ceased or they are not in use
- It is recommended that all vehicles involved in Traffic Management operations should carry a first aid kit and fire extinguisher
- It is recommended that all vehicles should be fitted with headrests and 3 point of fixing diagonal seat belts
- Four-way hazard lights should only be used in an emergency or a broken down vehicle status

The above are also applicable to vehicles used for inspection and monitoring activities on the highway.

7. Signs

All signs used in traffic management must conform to the requirements laid out in the relevant primary guidance given in Table 1 and The Traffic Signs Regulations and General Directions 2015.

- Guidance on signing mobile works and short duration works is given in both the Red Book and Chapter 8
- Road works (ahead) warning signs with sub-plate legends ‘Road sweeping’, ‘Mobile road works’ or ‘End’ and single file traffic triangular signs with ‘single file traffic ahead’ sub plates are appropriate for use on single lane carriageways
8. Monitoring, inspection and review

Regular monitoring and inspection should be undertaken to ensure that specified safe operating procedures and control measures are being used. Where the cleansing operation is undertaken by a contractor monitoring shall be undertaken by the contractor and also by the client local authority. Where the cleansing operation is undertaken in-house the monitoring will be the responsibility of the operational management. The frequency of monitoring and inspection should be determined by the level of risk present and the results recorded.

Inspections and monitoring should only be undertaken by suitably competent persons. Vehicles used for inspections must meet the minimum requirements set out in Chapter 8 (see above) or be parked in a suitable safe area.

An example of a checklist that could be used for monitoring the safety of cleansing activities where TTM is required is available at Appendix 1. The checklist could be adapted for lower risk activities where TTM is not needed and more limited control measures are required.

Periodic reviews of the working practices and associated documentation should be undertaken to reflect changes such as legislative or other guidance changes; and following an accident/near-miss. A review should also be undertaken if it is felt that the working environment has changed enough to affect the overall risk to the operatives or the public. In addition, the working environment on the highway may change due to seasons in the year, vegetation growth or change in traffic density or type. In any event, a scheduled review of procedures should take place at pre-determined intervals.
9. Information, instruction and training

Workers must be given enough information and training to carry out their duties safely and effectively. There are specific training requirements for those engaged in traffic management activities (see above). It is important that those involved have been inducted and trained on safe systems of work. They should be clear about the process to be followed and it is particularly important to consider the training needs and supervision of:

- New employees and trainees
- Young people who are particularly vulnerable to accidents
- People changing jobs, or taking on new responsibilities; and
- Workers for whom English is not their first language

For additional advice, see HSE leaflet *Health and safety training: A brief guide to employers* (INDG345).

10. Worker consultation and engagement

Workers must be consulted and engaged regarding the health and safety arrangements and working practices. Their support is essential in ensuring safe working. Safety representatives and other workers can contribute positively in achieving the desired outcomes by:

- Identifying problems
- Indicating whether activities can be carried safely under prevailing conditions; and
- Generating sound practical ideas and solutions

Further information on worker involvement can be found at [www.hse.gov.uk/involvement/index.htm](http://www.hse.gov.uk/involvement/index.htm) and in HSE leaflet *Consulting employees on health and safety: A brief guide to the law* (INDG232).

11. Reporting and investigating incidents

There is a requirement under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR), to report specific types of accidents/incidents, including dangerous occurrences, to the relevant enforcing authority (usually HSE).
RIDDOR applies to all work activities but not all incidents are reportable. Investigations should aim to reveal the immediate and underlying causes, ensure lessons are learnt and remedial action is taken.

Further information about what must be reported and how to report it can be found at www.hse.gov.uk/riddor, and in HSE leaflet Reporting accidents and incidents at work (INDG453).

12. Community

In some areas local residents or local community groups organise and carry out a range of clean-up activities that could include the cleansing of highways and litter picking. This work generally supports the delivery of council services and volunteers are widely regarded as a valuable and useful resource.

Volunteers, whether individuals or part of a group or organisation, are not employees and as such volunteering would not normally fall within the scope of health and safety law. Section 3 of the Health and Safety at work etc Act 1974, however, does require employers (councils and other employing organisations involved) to protect people other than their employees (e.g. members of the public and volunteers) from risks to their health and safety arising from work activities.

It therefore follows that councils and organisers are required to guarantee a basic level of protection for volunteers that work on their behalf. The level of the protection they should afford will depend on the nature of the task(s) and the associated hazards and risks. A risk assessment of the activity should be carried out by the council and/or organisers prior to the activity taking place.

Using volunteers for low risk tasks should not present any problems or incur significant resources, however, as the hazards and risks increase so does the council’s and organisers duty of care.

The risk assessment may determine that the council and organisers may need to provide assistance in terms of the undertaking of further risk assessments, providing advice and information about hazards and protective measures, and the provision of appropriate PPE. Further measures such as training (particularly if fulfilling a skill-based role and/or using work equipment that is provided or loaned by the council), how to implement protective measures, and providing monitoring and supervision may also be required.
Further reading and information


Safety at Street Works and Road Works; A Code of Practice ('The Red Book')

Interim Advice Note 115/08 revision 1: Guidance for Works on the Hard Shoulder and Road Side Verges on High Speed Dual Carriageways (included in Chapter 8 in March 2009)

Interim Advice Note 150/12 Guidance for Alternative Temporary Traffic Management Techniques for Relaxation Schemes on Dual Carriageways.


UKAS National Highways Sector Scheme sections 12a, 12b, 12c, 12d and 18 http://www.ukas.com/


The Traffic Signs Regulations and General Direction 2015

HSE leaflet Health and safety training: A brief guide to employers (INDG345) INDG 345

HSE leaflet Consulting employees on health and safety: A brief guide to the law (INDG232). INDG 232

HSE leaflet Reporting accidents and incidents at work (INDG453) INDG 453
HSE website: www.hse.gov.uk

HSE’s waste website: www.hse.gov.uk/waste/wish.htm


The Highway Code https://www.gov.uk/highway-code
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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 that can improve industry health and safety performance.

Further information

This guidance is issued by the Waste Industry Health and Safety (WISH) Forum to help control safety and health risks. Following the guidance is not compulsory, unless specifically stated, and you are free to take other action. But if you do follow the guidance you will normally be doing enough to comply with the law. Health and safety inspectors seek to secure compliance with the law and may refer to this guidance.

This guidance is available free to download at the WISH web site.