

Waste Industry Safety and Health Forum FORMAL GUIDANCE DOCUMENT

SAFE OPERATION OF WASTE AND RECYCLING COLLECTION VEHICLES

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 the operation of waste and recycling collection vehicles. The Health and Safety Executive (HSE) was consulted in the production of this publication. It endorses the sensible, proportionate, reasonable, and balanced advice on managing risk during waste-related activities as set out in the guidance.

This guidance is about waste and recycling collection activities in street/urban environments. The focus is on operational issues associated with the use of collection vehicles, particularly in areas where there is a potential for members of the public to come into close proximity with moving vehicles. The principles can be applied to all waste and recycling collection services, including commercial/trade collection services. It is written for employers, managers, supervisors, and workers. It provides guidance on managing the risks associated with vehicle operations and movement and provides practical examples of how to eliminate, or reduce, the risk of serious injury.



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Disclaimer and WISH

Note – throughout this guidance mention is made of various WISH supporting documents:

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

INFO 11 Safety in driver only commercial waste and recycling collections

INFO 12 Reversing in waste recycling collection

REF 01 Example daily periodic check sheets for street collection vehicles

REF 02 Case Studies bin lifters and bins on waste vehicles

REF 03 Example refuse recycling collection round data sheet

REF 04 Example format driver assessment

These are not a formal part of this guidance. They either provide further information (those noted as INFO documents) or are examples of how some organisations approach the relevant topic or case studies (those noted as REF documents). These should not be taken as formal guidance – you need to decide how you will do things, although these supporting documents may help you in deciding. These support documents are all available on the WISH web site.

Tip – throughout this document, and in the further reading and useful links section below, extensive use is made of 'hyper-links'. This is for convenience. However, over time some of these links may well change – if a link does not work for you go to the relevant web site and search.

1. Introduction

This WASTE 04 guidance document on the safe operation of waste and recycling collection vehicles was first produced in the 2000s. In 2019 the document was revised extensively including the removal of its appendices and their production as separate standalone information sheets and reference documents (see list above). In addition, what was WASTE 05 on the safe use of hoists and bins was incorporated into this document and WASTE 05 itself withdrawn. This version 3 of WASTE 04 includes various minor revisions and, more significantly, two new sections have been added: 2.4 on crew ride-on platforms and 2.5 on roll/drive-away incidents.

This guidance explains how to manage the risks associated with:

- Vehicles (including bin lifters)
- Workers (including drivers, operatives, and agency workers)
- Activities in public access areas (such as streets and car parks)
- Operation of vehicles (including reversing the main cause of fatalities during collections)

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

This guidance cannot be comprehensive and cover every eventuality, but you may find its contents helpful in considering what you need to do to comply with the law. The risks associated with your particular activities, and the methods of reducing those risks, should be identified during your risk assessment process.

This document also refers to advice and/or requirements from other regulatory authorities such as, Police, Fire Service, Driver and Vehicle Standards Agency (DVSA), Environment Agency, Natural Resources Wales, and Scottish Environment Protection Agency.

Note – this guidance considers hazards and risks while collecting and transporting wastes. It does not consider safe transport while actually on waste management sites. Separate guidance on transport at waste and recycling premises is given in WISH WASTE 09 "Safe transport in waste management and recycling facilities". This guidance is available free to download from the WISH web site.

2. Managing the risk

It is a legal requirement for employers to assess the risks of their specific activities to identify the measures they need to have in place to comply with their duties under health and safety law. Risk assessments aim to help you:

- Identify the hazards
- Identify those potentially at risk, such as:
 - Your workers, agency workers, temporary workers etc
 - The public (other road users and pedestrians)
 - Contractors, subcontractors etc
- Assess the risks from those hazards, remembering that consideration may be needed for people with disabilities, young people, etc
- Eliminate or at least reduce the risks from those hazards so far as is reasonably practicable

It is important that work is monitored and reviewed regularly. This will help identify potential flaws in your systems. You should ask questions such as:

- Is the design, layout, and maintenance (of vehicles, depots, collection rounds, etc) the best that is reasonably practicable to minimise the risks?
- Is the hardware (bins, receptacles, compactors, etc) suitably situated and sufficiently maintained in order to minimise risks?
- Do employees follow your agreed systems of work? If not, why not?
- Are your systems adequate to control the risk? Do they need revising?
- Are the procedures and checks you have put in place sufficient? Do you need to do certain tasks more (or less) frequently?
- Are there any changes to the environment?
- Can other collection vehicles or different methods be used to reduce the hazard?

Staff should be consulted and engaged with on health and safety arrangements. Their support is essential. Safety representatives and other staff can contribute to achieving the desired outcomes by:

- Identifying problems
- Indicating whether activities can be carried out safely
- Generating sound practical ideas and solutions

For more information about risk assessment see www.hse.gov.uk/risk/index.htm (see further reading and useful links at the end of this document).

Vehicle movements in the waste and recycling industry represent a risk of serious or fatal accidents to workers and the public. To manage these risks effectively, you need to consider three key areas:

- Safe vehicle (including lifting equipment and ancillary equipment)
- Safe place of work and safe systems of work
- Safe worker

2.1 Safe vehicle

The following should be read in conjunction with guidance enforced by other authorities such as the police, the DVSA and Transport for London (for example <u>Safer Lorry Scheme - https://tfl.gov.uk/infofor/deliveries-in-london/delivering-safely/safer-lorry-scheme</u>). The vehicle operator should ensure that vehicles (whether owned, hired, leased or borrowed) used for the collection of waste and recyclables are fit for purpose, roadworthy, and incorporate essential safety features.

Tip – useful examples of daily and other periodic checks on street collection vehicles can be found in the WISH reference document REF 01 Example daily periodic check sheets for street collection vehicles. As for all WISH documents this can be found on the WISH web site.

2.1.1 Visibility from the vehicle

The following will allow the driver to be able to see clearly around their collection vehicle:

Windows

Should:

- Be kept clean
- Not be obstructed by items such as stickers, clothing, newspapers, or additional equipment such as CCTV monitors

Mirrors

Should be:

- Designed and positioned correctly to provide the optimum field of vision (e.g. wide angle) (see the Department for Transport Information Sheet relating to Summary of Requirements for Mirrors on Motor Vehicles:
 - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/780602/information-sheet-mirrors.pdf- at www.gov.uk for further information)
- Undamaged
- Clear of dirt and condensation

Working Zone CCTV

The primary function of CCTV is to protect the crew during collection operations. Such systems are not designated as 'reversing cameras' and should be seen as a supplementary - and not a primary - reversing aid. Operators and drivers should be aware of the potential for blind spots (e.g. close to the vehicle and immediately behind the rave rail) in which pedestrians/loaders can disappear from view.

CCTV camera lenses

Should:

- Be positioned and adjusted to provide optimum vision during reversing
- Be clean
- Provide a good view of the working zone (it is recommended the camera provides a wide field of view and extends at least 5 metres behind the vehicle)
- Cater for low light levels

CCTV systems

Should:

- Be of sufficiently high definition to give a clear view of the rear working and pedestrian zone
 (N.B. colour monitors provide a clearer visual display than monochrome)
- Display a mirror image when the monitor is positioned to function in the same way as a rearview mirror
- Not 'blank out' in sunlight (this can be achieved by adjustable monitors, monitor shrouds etc)

 Note: drivers should be instructed that in the event of a rear-view CCTV system failure, the collection vehicle should be taken out of service.

Increasingly, collection vehicles are being fitted with additional cameras, giving up to 360° vision, and recording images for future reference. Whilst these may give valuable insights into working practices, and provide evidence following incidents, they have little or no relevance in real time for drivers and crews whilst carrying out collection activities.

2.1.2 Warning devices

Warning devices include:

High visibility warning lights/beacons

These should be fitted to the front and rear of collection vehicles such that they can be:

- Clearly seen from all angles 360 degrees
- Capable of warning pedestrians
- Easily and properly maintained

Reversing alarms

These should be fitted and be clearly audible at the side and rear of the vehicles. They should work at all times when the vehicle is reversing (during permitted hours i.e. 7am to 11.00pm).

Reversing detectors

These can provide additional warning of objects or people entering the reversing zone, but they should not be regarded as a primary reversing aid. If fitted, ensure that it only covers the area behind the vehicle and not the sides, as this can create false alarms.

Handbrake alarm

If a driver opens the door of the vehicle without applying the handbrake/parking brake an audible alarm will sound. It is recommended that these are fitted and emit a different sound to the "lights on" warning alarm. This should also be the case on newer vehicles with automatic parking handbrakes. *Note:* Such alarms are not always fitted in the standard designs of vehicle manufacturers and therefore they may need to be specified or retrofitted.

2.1.3 In-cab features

Vehicles should have the following in-cab features:

- The height of the vehicle should be prominently displayed in the cab
- Seats should be adjustable to achieve a comfortable driving position, and a headrest fitted
- Drivers and the crew in the cab must wear seat belts when travelling more than 50 metres between stops. Seatbelts in high visibility material can help management check this
- Suitable communication equipment (e.g. two-way radios) should be considered for situations where it is unsafe for the deployment of a reversing assistant, but a crew member could aid the driver from a safe position with a clear view. A mobile phone can be provided to ensure communication between the driver and management and for emergencies, however strict instructions and limitations on use should be applied. See the Department for Transport web page at www.gov.uk for guidance on the use of mobile phones (https://www.gov.uk/using-mobile-phones-when-driving-the-law).
- Cabs should be kept clear of clutter and other loose material that may interfere with driving controls or a driver's concentration

Note: It became mandatory for manufacturers to fit seat belts in 2001 and the Road Traffic Act 1988 requires them to be worn where fitted. Vehicles manufactured prior to 2001 may not have seatbelts fitted. There are also a limited range of medical exemptions from wearing seatbelts and operators are advised to check that their procedures comply with this legislation. The exemption is defined at regulation 2(b) Motor Vehicles (Wearing of Seat Belts) (Amendment) Regulations 2005 (2005 No 27).

2.1.4 Lifting equipment (bin lifters) and bins

The lifting operation of the wheeled waste collection bins (both domestic "wheelie bins" and larger size trade waste bins) by the bin lifters has also caused serious accidents.

Tip – Further information on the common causes of injury (including case studies) and the necessary control measures relating to safe use can be found in the WISH information document INFO 10 Safe use of refuse collection vehicle bin lifters and bins the WISH reference document REF 02 Case Studies bin lifters and bins on waste vehicles. All WISH documents these can be found on the WISH web site.

2.1.5 Load

Vehicles should not be driven when overloaded. To assist drivers the following are recommended:

- The use of on-board weighing equipment
- Fitting weight sensors (preferably with automatic compactor cut-off to prevent overloading)
 particularly when loading recyclables of different weights

Regular monitoring of weighbridge tickets should be carried out to establish trends

Drivers should know:

- The gross vehicle weight (GVW)
- The vehicle's payload
- How to operate weighing equipment (if fitted)
- What to do when the on-board weigh equipment fails
- The procedures to follow in the event of an overload.

2.1.6 Ancillary equipment

First aid boxes should be provided and kept stocked in line with first aid risk assessments. Guidance is available in First aid at work: Your questions answered Leaflet (http://www.hse.gov.uk/pubns/indg214.pdf).

Firefighting equipment (where required or fitted) should be:

- Suitable
- Maintained
- Easily accessible
- Clearly marked for it's appropriate use
- Only used by drivers and crew who have been instructed and trained when and how to use it correctly

2.1.7 Facilities for hand cleansing

A good standard of personal hygiene is essential to prevent ill health. Facilities should be provided on collection vehicles for workers to maintain effective hygiene and should include:

- Hand wash basins (with soap, warm/cold water provision and towels)
- Hand wipes
- Hand gels

These can be provided either separately or in combination (as well as in conjunction with other measures, e.g. provision of personal protective equipment), as appropriate to the activity and dependent on the risk. Alternative control measures can be used if it can be demonstrated they are the most effective and reliable control options. Factors to consider include:

- The nature and type of materials being collected
- The potential level (low/medium/high) and frequency of contamination
- Levels of containment (e.g. bags, wheelie bins, boxes)
- Routes of exposure
- The location of collection activities (e.g. rural versus urban)
- The hierarchy of controls and specific measures, as well as principles of good practice (as outlined in <u>COSHH http://www.hse.gov.uk/coshh/index.htm</u>) such that the control measures adopted are effective, reliable, practicable and workable to control exposure adequately
- Emergency decontamination procedures and arrangements. For example, during collection activities if gross contamination occurs (e.g. from split bags, contact with animal and human waste, acids, alkalis etc) the provision of hand wipes and/or gels alone is unlikely to be sufficient. Where such circumstances are foreseeable, emergency arrangements should be provided, including for example additional measures to assist with cleaning (such as a readily available bulk supply of clean water, identification of locally available welfare facilities etc)

Facilities and equipment provided should be kept sufficiently stocked and/or maintained in good working order. Also, avoid strong or abrasive cleansers that can cause irritant dermatitis.

2.1.8 Inspection and maintenance of vehicles and ancillary equipment

Vehicles should be maintained in good working order, so they remain mechanically sound, and any devices, such as flashing beacons, on-board weighing, CCTV etc, function properly.

Any <u>lifting equipment</u> <u>http://www.hse.gov.uk/work-equipment-machinery/lift-equipment.htm</u> (e.g. bin lifts, tail lifts etc) must be thoroughly examined by a competent person and reports kept.

Planned inspections are a vital part of preventative maintenance. These should include:

- Daily safety checks carried out by drivers
- Regular maintenance inspections based on time or mileage, and in accordance with manufacturer's instructions

Drivers should be provided with a list of the daily checks to be signed off at the start of each shift. This should be monitored to ensure the checks are carried out properly.

Tip – useful examples of daily and other periodic checks on street collection vehicles can be found in the WISH reference document REF 01 Example daily periodic check sheets for street collection vehicles. As for all WISH documents this can be found on the WISH web site.

All defects should be reported to management, and any safety-critical defects repaired before the vehicle leaves the depot.

Adequate records relating to the vehicle should be kept. These may include:

- Tachograph or other working time records
- Daily and periodic check records
- Maintenance (including planned preventative maintenance) and repair records

2.2 Safe place of work and safe systems of work

2.2.1 Collection points

Containers for waste and recyclables should be placed in locations that minimise the need for difficult vehicle manoeuvres. This will require liaison with customers and householders.

Where new developments are planned, local authorities are encouraged to liaise with planners prior to building approval to ensure the collection of waste is taken into consideration. A case study on this is available at www.hse.gov.uk/waste/services/case-studies/waltham-forest.htm.

2.2.2 Collection risk assessments

Collection activities should be planned and risk assessed in line with the guidance given in <u>WISH WASTE 23 "Safe waste and recycling collection services"</u> (available on the WISH web site) to ensure, so far as is reasonably practicable, that risks to crews and the public are minimised.

Additional guidance on collection risk assessments can also be found in IOSH Waste collection health and safety management training package (from the IOSH web site). For more details email Networks@iosh.co.uk.

Tip – for further information also see WISH information document INFO 11 Safety in driver only commercial waste and recycling collections. As for other WISH documents this can be found on the WISH web site.

2.2.3 Reversing

Reversing is a high-risk activity and should be eliminated wherever possible or otherwise minimised. This may be achieved by:

- Planning the route effectively
- Selecting of the most appropriate vehicles
- Positioning of waste and recycling collection points.

Where the risk assessment identifies that reversing is likely, the additional control measures should include:

- The use of reversing aids
- The use of trained reversing assistant/s

Tip – for further and more detail information also see WISH information document INFO 12 Reversing in waste recycling collection. All WISH documents this can be found on the WISH web site.

2.2.4 Workplace violence and aggression

Violence, threatening behaviour, abuse, and aggressive driving are increasingly being reported by collection crews. Managers should:

- Identify potential 'hotspots', inform crews and reschedule collections if necessary
- Liaise with clients or key stakeholders (whether internal or external) to manage expectations as to what the collection will cover and any constraints
- Provide training to recognise and react appropriately to aggressive behaviour
- Provide crews with effective reporting mechanisms and ensure feedback is provided
- Ensure that all incidents are reported to the appropriate authorities

2.3 Safe worker

Driver selection and ability

Employers should ensure that drivers (including agency and temporary drivers), are fit and capable of operating vehicles safely. They should assess drivers to determine their fitness, ability, and attitude to do their work competently. See also 'Driver Assessment' below

Fitness for Work

- Employers are required to confirm driver fitness and health. For further information on eyesight (https://www.gov.uk/driving-eyesight-rules) and medical fitness (https://www.gov.uk/guidance/appendices-assessing-fitness-to-drive) see the DVLA's website and HSE publication Driving at work www.hse.gov.uk/pubns/hse5.pdf
- Drivers are required to present themselves in a fit state for work. They should not be excessively tired, or suffering adversely from drugs (prescription or otherwise), alcohol, or any other factor which could reduce their ability to drive safely

Driver assessment

- Employers should appoint a competent or qualified 'driver assessor' who can routinely review and reassess drivers' skills. They can be recruited from external organisations or from within the company if suitably competent employees can be identified. (In practice, different aspects of this role may be shared between different individuals or even organisations)
- The assessor should:
 - use theory and practical tests to establish competence and suitability
 - take pre-employment details of driving licence, endorsements and accident history
 - carry out and record periodic driving licence checks
- Drivers should report to management any alterations or endorsements to their licences immediately

Tip – for further information also see WISH reference document REF 04 Example format driver assessment. All WISH documents this can be found on the WISH web site.

Standby and agency drivers

When standby or agency drivers are required, the vehicle operator should ensure that the same standards are applied in terms of medical fitness, training, and competence. Agency or temporary workers must be provided with the same level of health and safety protection as permanent employees including PPE (personal protective equipment)

Secondary employment

- Drivers should comply with their company's written rules and legislation regarding working excessive hours
- Drivers wishing to pursue additional work should notify their employer
- Employers should consider the effects of secondary employment, especially if the proposed additional work involves shifts or excessive hours that could adversely affect concentration and physical condition to drive
- Managers should remind drivers periodically of the company's rules regarding secondary employment

2.3.1 Training

Employers should provide adequate information, instruction and training for drivers and crews, including temporary/agency workers. Guidance can be found in WISH WASTE 21 Health and safety training in waste management and recycling (available from the WISH web site).

Employers should ensure the following are included in a training programme:

- Identification of levels of skill and expertise required to do the job safely
- Induction training (beginning the first day of employment)
- On the job training (under the control of a competent person)
- General health and safety awareness training. This should be completed as soon as possible after a new employee starts and in any event before the employee is exposed to any significant risks
- Safe working practices, including:
 - General road safety
 - Reversing operations
 - Manual handling techniques
 - Vehicle safety checks

Tip – useful examples of daily and other periodic checks on street collection vehicles can be found in the WISH reference document REF 01 Example daily periodic check sheets for street collection vehicles. As for all WISH documents this can be found on the WISH web site.

Until training is completed, and competence demonstrated, new starters should work under the close supervision of a competent person. Employers should also:

- Be mindful of individuals' literacy, numeracy, and linguistic abilities
- Assess training needs periodically
- Provide refresher training and on-going training when necessary, including but not confined to toolbox talks on relevant topics
- Ensure that training providers are competent to deliver the training

2.3.2 Health

Employers should assess the health risks related to the work undertaken by drivers and crews and ensure that appropriate measures are taken. This might include:

- Offering appropriate information about vaccinations. Employers may need to seek advice from a suitably qualified clinician or occupational health practitioner
- Provision of health education and advice
- Undertaking a COSHH bioaerosol risk assessment, particularly for green/food collections and less frequent collections of residual wastes

For further information about some specific health risks see the following:

- Leptospirosis: Are you at risk?
- Working with sewage: The health hazards A guide for employees
- Blood-borne viruses in the workplace: Guidance for employers and employees
- WISH REF 05 on occupational health: https://www.wishforum.org.uk/wp-content/uploads/2020/05/REF-05.pdf
- WISH INFO 13 on COVID-19: https://www.wishforum.org.uk/wp-content/uploads/2021/08/INFO-13-COVID19-and-waste-management-issue-11-6-Aug-21.pdf

All above available from the HSE web site. Further guidance can be found in WISH WASTE 27 Health and hazardous substances in waste and recycling (available from the WISH web site).

2.3.3 Personal Protective Equipment

PPE must be provided free by employers where risks cannot be controlled by other methods. When providing PPE, you should consider:

- Visibility
- Weatherproofing
- Cut and puncture resistance
- Slip resistance
- Cleaning, care, and maintenance
- Storage and replacement arrangements

Suitable and sufficient information, instruction and training should be given in the correct use, care and maintenance of PPE. PPE should be fit for purpose and manufactured to a recognised British or European Standard (where appropriate).

It is considered standard industry practice to issue all drivers and collection crews in street collections with High Visibility clothing. This will be determined by risk assessment. It is likely to include:

- Class 2 High Visibility vest
- Class 3 High Visibility jacket (long sleeve)
- High Visibility trousers

Note: 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.

Further guidance on PPE can be found in <u>Personal Protective Equipment (PPE) at work: A brief guide (http://www.hse.gov.uk/pubns/indg174.htm)</u>.

2.4 Crew ride-on platforms

Rear mounted ride on platforms should not be fitted or used on any type of refuse or recycling collection vehicle in use anywhere in GB.

EN1501-1 is the main 'harmonised' standard applying to rear-loaded refuse/recycling collections vehicles, such as RCVs. The standard includes requirements for fitting and using rear mounted 'ride-on' crew platforms, the use of which is commonplace in mainland Europe. However, in the UK the fitment and use of such platforms was banned between 1986 and 1995. Since then, ride-on platforms have technically been permitted in GB by EN1501-1 but have been actively discouraged by the HSE. In addition, ESA member companies agreed not to fit platforms in 1995. UK data does not show a single serious injury or fatality involving a ride-on platform since 1987. Unlike in mainland Europe where multiple serious and fatal accidents are recorded every year.

Following the completion of the Brexit transition period, the UK will continue to operate to most current EN harmonised standards (these have now become 'designated standards' and are administered by Office for Product Safety). There is no intention to change the current industry and enforcement positions relating to ride-on platforms. The HSE has formally referred the inconsistency between EN1501-1 and accepted GB industry practice to BEIS for clarification.

Collections crews should be reminded that riding on vehicles other than in the cab is not allowed and will be treated as a serious matter.

2.5 Roll/drive-away incidents

The waste and recycling, and many non-waste transport industries, continue to experience vehicle roll and drive away incidents. Roll-away events are where a vehicle rolls-away down a slope under gravity, typically because the parking/hand brake has not been applied, or not applied fully. Drive-away incidents are where a vehicle drives-away under its own power, such as when a vehicle has been left in 'drive' and any interlock or similar system designed to prevent such an event is ineffective.

The potential consequences of such incidents are obvious:

 The vehicle may collide with a person/s or an object resulting in serious or fatal injury or property damage

 The driver, or other person, may attempt to re-enter the cab to apply the brakes and is themselves run over, again resulting in serious or fatal injury

Common causes of such events include:

- Driver error, such as failure to apply the parking/hand brake fully and correctly
- Faults/failures or tampering with safety systems designed to prevent drive-away incidents

To prevent/reduce the likelihood roll-away/drive-away incidents:

- Driver training on vehicles should include detailed instruction on the operation of the parking/hand brake, including any locks, release mechanisms and similar
- Drivers should be reminded of the critical importance of including parking/hand brake operation during thorough daily or first use pre-checks
- Driver training and induction should include a section on roll-away/drive-away incidents, including the consequences of incidents
- Unless at a very slow creeping pace, and drivers can be absolutely sure that it is safe to do so, NO attempt should be made to re-enter the cab to prevent a vehicle roll/drive-away. Attempting to re-enter the cab to stop a moving vehicle has led to the deaths of a number of drivers
- Driver and crew training and induction should include clear procedures for raising the alarm should a vehicle roll/drive-away incident occur, such as alerting any person who may be in the path of vehicle by loud shouting and arm waving
- New collection vehicle specification should include automatic systems which apply the parking/hand brake automatically if the driver opens the cab door without fully applying the parking/hand brake
- For older fleets and existing vehicles, as a minimum, there should be an audible warning to alert the driver that the parking brake is not correctly applied (the sound should be different from lights-on warnings etc). Note – this type of system should not be fully relied on as they do not fail to safe and may not detect that a parking brake has only been applied partially
- Vehicle control and electrical systems, in particular safety systems such as interlocks, should not be interfered with in any way without strict authorisation systems being in place. For example, robust change management systems where modifications are approved by a senior technical manager and safety professional. Modifications must be thoroughly tested to identify any unforeseen effects on other vehicle systems before final approval, and any modifications must be documented in detail, including in maintenance schedules and operating procedures. Drivers and crews should be made aware of any modifications and their implications
- Drivers, crews, maintenance personnel and similar should be reminded that tampering with any safety system is illegal and will be treated as a serious matter attracting disciplinary measures up to and including dismissal

- Tamper-proof seals should be installed on critical components and wiring junction boxes to
 prevent access, and those seals should be inspected regularly at planned maintenance
 inspections, and any damaged or missing seals must be reported and thoroughly investigated
 to ensure nothing has been modified without authorisation
- Checking seals can also be included in third party inspections, such as LOLER inspections, so there is a regular independent check of seals
- If seals need to be removed for maintenance, this should be recorded on maintenance documentation along with confirmation that a replacement seal has been fitted immediately following the work

Note – in the section above the term 'drive-away' is used. This is purely for the sake of this guidance document and is not intended to be definitive. Other sectors may use different terms, for example, see: https://www.hse.gov.uk/workplacetransport/sitebased.htm.

3 Management

3.1 Supervision and monitoring

Employers should ensure that collection crews are regularly monitored to ensure that the agreed systems of work are followed in practice, and to make sure that collection activities are effective and safe. Deviations from agreed safe working procedures may lead management to consider the following:

- Is the method established appropriate or are changes needed?
- Have all reasonably foreseeable circumstances and risks been anticipated?
- How effective is the current training?
- Is there a need for further or refresher training?
- Is improved supervision or disciplinary action needed?

Reviews of incidents, accidents, ill health reports and near misses can help you identify potential flaws in your systems.

To be effective, risk assessments and safe working practices should be reviewed periodically or following an accident or change in procedures.

The following checks might be suitable:

- Check vehicle inspection sheets
- Carry out periodic on-site inspections of working practices (e.g. reversing practices (including the use of reversing assistants) wearing of PPE, wearing of seatbelts, manual handling behaviours)
- Check weighbridge tickets for overloaded vehicles.
- Monitor rest periods, hours worked, speeding and break periods
- Review route planning

Those carrying out monitoring and supervision should be appropriately trained.

Tip – for more information on driver monitoring see WISH information document INFO 03 Effective proactive monitoring in waste and recycling collections. All WISH documents this can be found on the WISH web site.

3.2 Record keeping

Records of checks should be kept, to help evaluate the effectiveness of systems. How long records have to be kept will depend on the legal requirements and internal procedures. Advice on this should be obtained from your health and safety advisor or another appropriate person. Records may include:

- Vehicle inspection sheets/defect reports
- Inspection/maintenance records
- Tachograph analysis
- Drivers' logbooks/record sheets
- Time sheets and daily check sheets
- Receipts for the issue of information on safe working practices
- Training records
- Risk assessments
- Accident/incident reports
- Vaccinations
- Onsite inspection reports
- Incident records
- Other monitoring reports, including external agencies such as DVSA
- PPE issued to collection workers
- Monitoring sheets

4 References, further reading and useful links

4.1 References

WISH WASTE 09 - Safe transport in waste management and recycling facilities

First aid at work: Your questions answered Leaflet INDG 214(rev2) HSE Books 2014 ISBN 978 0 7176 6469 6 www.hse.gov.uk/pubns/indg214.htm

Control of substances hazardous to health (COSHH). The Control of Substances Hazardous to Health Regulations 2002 (as amended). Approved Code of Practice and guidance L5 (Sixth edition) HSE Books 2013 ISBN 978 0 7176 6582 2 www.hse.gov.uk/work-equipment-machinery/lift-equipment.htm

WISH WASTE 23 - Safe waste and recycling collection services

WISH WASTE 21 Health and safety training in waste management and recycling

WISH Information Document XX – Examples of Toolbox Talks for those involved in waste and recycling street collection

Leptospirosis: Are you at risk? Pocket card INDG 84(rev1) HSE Books 2011 ISBN 978 0 7176 6455 9 www.hse.gov.uk/pubns/indg84.htm

Working with sewage: The health hazards – A guide for employees Pocket card INDG197 HSE Books 1995 www.hse.gov.uk/pubns/indg197.pdf

Blood-borne viruses in the workplace: Guidance for employers and employees Leaflet INDG 342

HSE Books 2001 ISBN 978 0 7176 2062 3 www.hse.gov.uk/pubns/indg342.htm

WISH WASTE 27 Health and hazardous substances in waste and recycling

Personal Protective Equipment (PPE) at work: A brief guide Leaflet INDG 174(rev2) HSE Books 2013 ISBN 978 0 7176 6475 7 www.hse.gov.uk/pubns/indg174.htm

4.2 Further reading and useful links

The list below is not comprehensive but does provide an overview of useful documents you may wish to consider. Other guidance is available – you should ask your competent health and safety advisor.

BS EN 1501-5:2011 Refuse collection vehicles. General requirements and safety requirements. Lifting devices for refuse collection vehicles British Standards Institution

http://shop.bsigroup.com/ProductDetail/?pid=00000000030133247

BS EN 1501-1:2011 + A1 2015 Refuse collection vehicles. General requirements and safety requirements -- Rear loaded refuse collection vehicles

http://shop.bsigroup.com/ProductDetail/?pid=00000000030299767

BS EN 1501-2:2005+A1:2009. Refuse collection vehicles and associated lifting devices. General requirements and safety requirements Side loaded refuse collection vehicles

http://shop.bsigroup.com/ProductDetail/?pid=00000000030180870

BS EN 1501-3:2008 Refuse collection vehicles and their associated lifting devices. General requirements and safety requirements. Front loaded refuse collection vehicles

http://shop.bsigroup.com/ProductDetail/?pid=00000000030110035

BS EN 1501-4:2007. Refuse collection vehicles and their associated lifting devices. General requirements and safety requirements.

http://shop.bsigroup.com/ProductDetail/?pid=00000000030170921

BS EN 349: 1993. Safety of machinery. Minimum gaps to avoid crushing of parts of the human body British Standards Institution ISBN 0 580 60963

http://shop.bsigroup.com/ProductDetail/?pid=00000000030173737

British Standards can be obtained in PDF or hard copy formats from BSI http://shop.bsigroup.com/ Lifting Operations and Lifting Equipment Regulations 1998 SI 1998/2307 The Stationery Office 1998 ISBN 978 0 11 079598 0 http://www.legislation.gov.uk/uksi/1998/2307/contents/made

Lifting equipment at work: A brief guide Leaflet INDG 290(rev1) HSE Books 2013 ISBN 978 0 7176 6483 2 www.hse.gov.uk/pubns/indg290.htm

Safe use of lifting equipment. Lifting Operations and Lifting Equipment Regulations 1998. Approved Code of Practice and guidance L113 HSE Books1998 ISBN 978 0 7176 1628 2 http://www.hse.gov.uk/pUbns/books/l113.htm

Provision and Use of Work Equipment Regulations 1998 SI 1998/2306 The Stationery Office 1998 ISBN 978 0 11 079599 7 http://www.legislation.gov.uk/uksi/1998/2306/contents/made

Safe use of work equipment. Provision and Use of Work Equipment Regulations1998. Approved Code of Practice and guidance L22 (Fourth edition) HSE Books 2014 ISBN 978 0 7176 6619 5 http://www.hse.gov.uk/pubns/books/l22.htm

Using work equipment safely Leaflet INDG229(rev2) HSE Books 2002 (single copy free or priced packs of 10 ISBN 978 0 7176 2389 1) Web version: www.hse.gov.uk/pubns/indg229.pdf
Providing and using work equipment safely: A brief guide Leaflet INDG291 HSE Books 2013 (single copy free or priced packs of 15 ISBN 978 0 7176 6477 1) Web version:
http://www.hse.gov.uk/pubns/indg291.pdf

Supplying new machinery: A short guide to the law and some information on what to do for anyone supplying machinery for use at work Leaflet INDG270(rev1) HSE Books 2011 (single copy free or priced packs of 15 ISBN 978 0 7176 1560 5) Web version: www.hse.gov.uk/pubns/indg270.htm
Buying new machinery: A short guide to the law and some information on what to do for anyone buying new machinery for use at work Leaflet INDG271(rev1) HSE Books 2011 (single copy free or priced packs of 15 ISBN 978 0 7176 1559 9) Web version: www.hse.gov.uk/pubns/indg271.htm
Workplace transport safety: An employers' guide HSG136 HSE Books 2005 ISBN 978 0 7176 6154 1 www.hse.gov.uk/pubns/books/hsg136.htm

Managing for Health and Safety HSG65 HSE Books 2013 ISBN 978 0 7176 6456 6 www.hse.gov.uk/pubns/books/hsg65.htm

Risk assessment www.hse.gov.uk/risk/index.htm

Manual handling. Manual Handling Operations Regulations 1992 (as amended). Guidance on Regulations L23 (Third edition) HSE Books 2004 ISBN 978 0 7176 2823 0 http://www.hse.gov.uk/pubns/books/l23.htm

Basic advice on first aid at work Leaflet INDG 347(rev2) HSE Books 2011 ISBN 978 0 7176 6435 1 www.hse.gov.uk/pubns/indg347.htm

Reporting accidents and incidents at work: A brief guide to the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) Leaflet INDG 453(rev1) HSE Books 2013 ISBN 978 0 7176 643 5 www.hse.gov.uk/pubns/indg453.htm

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

The Driver and Vehicle Standards Agency and the Department for Transport web pages can be found at www.gov.uk, where you can also find information about agency workers

The Freight Transport Association website: www.fta.co.uk

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Nothing in this guidance 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 guide. The guidance is not a substitute for duty holder judgment and/or professional safety advisor's judgment. Notwithstanding the good practice in this guidance, 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 health and safety law. WISH accepts no liability (to the fullest extent permitted under law) for any act or omission of any persons using the guidance

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.