

PRIMARY AUTHORITY ASSURED ADVICE

How to Assess Head Protection for Cold Store Workers

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Advice Issued June 2014 and reviewed June 2017 and May 2021, Primary Authority Advice is issued by Wakefield Council to The British Frozen Food Federation that the guidance document 'How to Assess Head Protection for Cold Store Workers version 4' is satisfactory to comply with Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999 and the Personal Protective Equipment Regulations 1992

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IT HAS BEEN ASSESSED BY THE PRIMARY AUTHORITY THAT THE ABOVE DOCUMENT DEMONSTRATES COMPLIANCE WITH HEALTH AND SAFETY LEGISLATION.

WHERE THIS DOCUMENT IS PROPERLY IMPLEMENTED BY BFFF MEMBERS IT WOULD DEMONSTRATE SO FAR AS IS REASONABLY PRACTICABLE, COMPLIANCE WITH THE ABOVE HEALTH AND SAFETY LEGISLATION

If you require further information and the full version of this advice and guidance, please contact the Primary Authority via the Primary Authority Register.

THE PRIMARY AUTHORITY WOULD NOT BE PREPARED TO SUPPORT ENFORCEMENT ACTIONS WHICH CHALLENGE THE ADEQUACY OF THIS POLICY.



Introduction

There is no specific legislation that states that hard hats should be worn within cold stores. The necessity to wear head protection should be determined by suitable and sufficient risk assessment. (see Regulation 3 of The Management of Health and Safety at Work Regulations 1999).

Risk Assessment

The first step is to carry out your risk assessment and as with any health and safety issue, a hierarchy of control measures should be followed to reduce any risks highlighted.

Control measures for cold stores to consider in a risk assessment to prevent falling stock are likely to include:

- Safe stacking methods for goods stored at height;
- Shrink wrapping pallets stored at height;
- Maintenance of racking;
- Checking condition of pallets prior to put away;
- Removal of damaged pallets;
- Time or distance separation of pick operations / stock put away;
- Racking protection barriers.

Where possible, removing the hazard is the best option. PPE should always be regarded as a 'last resort' means of preventing or controlling exposure to hazards to safety and health. This means that other methods of controlling exposure must be considered before taking the decision to use PPE.

Selecting Appropriate PPE

If you have determined that head protection is required to be worn within your store, then selecting the most suitable and appropriate equipment is the next stage.

The selection of suitable PPE within a temperature-controlled environment should involve the process of risk assessment, taking into consideration temperature, length of exposure, type of operation and personal preference. The aim should always be to choose equipment, which will give minimum discomfort to the wearer. Those companies having workers who have to use PPE should involve and consult the employees regarding the selection and specification of the equipment.

Table 12 (page 131) of HSG76 provides a guide to recommended PPE to be worn in temperature-controlled storage facilities. For head protection these are:

Chill environment (down to minus 5°C) - baseball cap or thinsulate hat or safety helmet

Frozen environment (minus 5°C and below) - safety helmet with thermal liner, thermal balaclava and thermal hood.

PPE must be CE marked.



When working below 0°C the body starts to try and keep organs warm by reducing blood flow to areas furthest from the heart including ears, fingers, and toes. Ears are a key area at risk from frostbite because they do not have any muscles to produce heat and keep them warm.

The Wearing of the Head Protection

If you have decided that head protection must be worn as a safety precaution, then the Personal Protective Equipment at Work Regulations 1992 (as amended) apply. Personal protective equipment is to be supplied free of charge and used at work wherever there are risks to health and safety that cannot be adequately controlled in other ways.

The HSE have produced guidance on these regulations (Personal protective equipment (PPE) at work. A brief guide), which is available at the following link:

<http://www.hse.gov.uk/pubns/indgl74.pdf>

It is the employees' duty to co-operate with you in order that you can fulfil your health and safety duties and they must wear PPE provided. The employers' duty is to monitor and enforce the wearing of the relevant PPE that you deem is a necessary safety precaution for the employee. Therefore the disciplinary procedures may be necessary if there are issues with enforcing your safety rules.

Conclusion

If you risk assess and conclude that employees within the cold store should wear head protection, the company should consult with the employees in order to agree on the selection of suitable and appropriate head protection. Once the selection process is complete, the company should:

- Supply the head protection to all relevant employees free of charge (employees should be provided with an element of choice from suitable head protection);
- Provide adequate storage facilities for the PPE;
- Train employees on how to use and maintain the PPE correctly;
- Put into place ongoing processes to inspect and maintain the PPE and replace where necessary;
- Enforce the wearing of the PPE in the appropriate areas and act if the employees disregard the safety processes (signage to indicate PPE to be worn in specific areas may be required); Monitor the safety processes put in place and review the safety measures implemented; Consider whether there is a need to provide head protection for site visitors.





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