



PRIMARY AUTHORITY ASSURED ADVICE

MATERIALS HANDLING EQUIPMENT OBSERVATION ASSESSMENTS

If you require further information and the full version of this advice and guidance, please contact the Primary Authority via the Primary Authority Register or email bfffprimaryauthority@wakefield.gov.uk

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

Primary Authority Advice is issued by Wakefield Council to The British Frozen Food Federation. This guidance provides details of a methodology that can be adopted by organisations to carry out observation assessments of their operatives using MHE (materials handling equipment). It also provides additional information to ensure that supervisors are competent and knowledgeable about how to complete such an assessment. The guidance will assist organisations in meeting their obligations under Regulation 9 of PUWER and to achieve the aims of Paragraph 75 of the ACoP L117.

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Introduction

Lift trucks including various forms of MHE (material handling equipment) are routinely used by operators for the movement and transportation of goods. In compliance with health and safety legislation organisations must ensure that equipment is maintained, and staff are trained in the correct use of such equipment. This guidance provides more detail on how to achieve the aim of Paragraph 75 of the ACoP L117; which states that “lift truck operators, even those who are trained and experienced, need to be routinely monitored in the workplace and, where necessary retested or refresher trained to make sure they continue to operate lift trucks safely

Definitions:

MHE – Material Handling Equipment

LLOP – Low Level Order Picker

PPT – Powered Pallet Truck

FLT – Fork Lift Truck



The Law

The Provision and Use of Work Equipment Regulations 1998 (PUWER) place certain requirements on employers. You must make sure that all people who use, supervise or manage the use of work equipment have received adequate training, which includes:

- the correct use of the equipment
- any risks from its use
- the precautions to take

Further detailed guidance is provided in:

- [INDG 462 \(03/13\)](#) – Lift-truck training: Advice for employers
- [L117 – ACoP](#) – Rider-operated lift trucks Operator training and safe use
- Appendix 1 Basic training: Objectives to consider
- Appendix 2 Basic training: Tests of operator skills
- Appendix 3 Example of an employer's training record Approved Code of Practice (ACOP) for lift-truck operator training

Supervisors

The Health and Safety at Work etc. Act 1974 requires you to provide adequate supervision. It is essential that supervisors have enough training and knowledge to recognise safe and unsafe practices. This does not mean they need full operator training, but they do need to understand the risks involved, and how to avoid or prevent them. Some organisations offer training courses for supervisors and managers of lift-truck operations.

Supervisors should be able to:

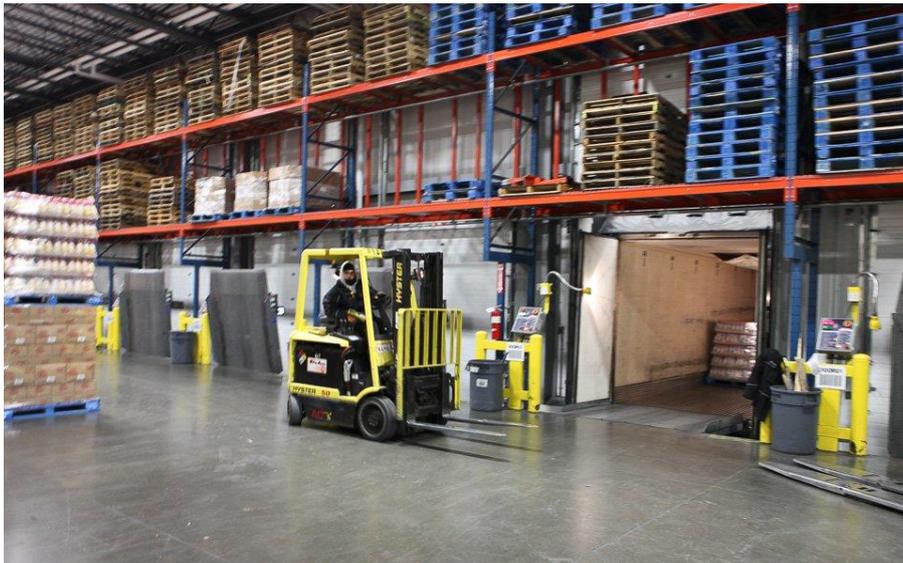
- carry out an effective observation and know what to look for (see Appendix 1 for an example of observation/assessment criteria);
- communicate effectively with operators and line managers for example pointing out unsafe practice and explaining company procedures and remedial actions
- recognise unsafe practice and behaviour
- maintain and promote health and safety standards, lead by example, challenge unsafe practices and reinforce good behaviour
- explain the benefits of good health and safety practice including a reduction in accidents and injuries, cost savings and increased productivity etc.
- have an awareness of remedial options available such as training, toolbox talks and other sanctions.



An organisation should document details of their nominated supervisors along with evidence of their assessment training and competency.

Aims of supervision are:

- to ensure safe practice
- reduce accidents/incidents
- improve Health & Safety Culture
- highlight any training requirements
- reduce costs



Selection and training requirements for MHE operators

Organisations should initially screen their employees to determine which they deem suitable to be trained to operate lift truck/ lifting equipment (e.g. age, health, ability, reliability). Formal operator training is then required covering three key stages:

- Initial basic training – driving a truck
- Specific training - relates to work task/ environment (e.g. cold store)
- Familiarisation training – on site with the actual equipment

All training must be provided by suitably qualified and competent instructors covering a combination of both practical and written tests and enable organisations to provide written authorisation/certification to be provided for each type of MHE this must include accessories such as fork extensions. Although there is no legal requirement for refresher training, it is recommended that all users attend periodic refreshers to ensure they:

- maintain good driving habits
- learn new skills where appropriate
- reassess their abilities.



Refresher training or retesting should also be considered where operators:

- have not used trucks for some time
- are occasional users
- appear to have developed unsafe working practices
- have had an accident or near miss
- have changed their working practices or environment

Monitoring and assessment of operators

Lift-truck operators, even those who are trained and experienced, need to be routinely monitored and, where necessary, retested or refresher trained to make sure they continue to operate lift trucks safely. There is no specific time period on the need to provide refresher training or formal assessment, however, driving standards may vary over time and you will need to establish the best way to make sure each employee remains competent. Where possible the recommended age for medical refreshers should be aligned with those of HGVs. It is not acceptable to rely purely on the need for refresher training after a designated period of time (e.g. every 3–5 years as referenced in Paragraph 79 of guidance L117).

Structured regular monitoring is recommended and enables poor driving practices to be challenged before any incidents occur. See Appendix 2 – MHE Observation Log, which outlines an example of the monitoring criteria.

To maintain an assessment of competency, a programme of periodic monitoring and assessment should be documented and implemented. This can be achieved by carrying out periodic observation assessments of operators as they carry out their routine duties. The results should be used to identify training needs/further assessments and be recorded against personnel records including the following:

- details of the initial training date of the operator
- what MHE equipment they can/are authorised/certified to use
- the date of assessment
- any corrective actions and how this was communicated
- the details of any refresher training



Observation Process

1. Observations do not need to be completed by someone trained to drive the MHE; however the supervisor or manager completing the assessment should have received training on what constitutes good or bad practice and be able to apply the assessment criteria for the operative driving the equipment.
2. The supervisor or manager may wish to shadow their MHE instructor on a couple of observations or have received alternative instruction prior to completing their own assessments.
3. Observations should take place unannounced and from a suitable location so that the driver is unaware they are being assessed. It is recommended that a structured observation programme is introduced. For example, observations of all operatives are completed at a frequency of no greater than three months.
4. Observations should be completed in isolation of the outcome of any previous assessments to avoid influencing the result (i.e. awareness of prior failing).
5. The assessor should complete a record of both good and bad practices observed. Additional comments can be added to supplement the assessment criteria.
6. The outcome of the observation should be discussed with the relevant operative within an appropriate timeframe depending on the severity of the issue. Important issues should be addressed immediately, and all outcomes should be discussed within seven days of the assessment. Where appropriate reference should be made to any observations made on previous assessments.
7. Where relevant the appropriate course of follow up action should be recorded (e.g. see training section).
8. Completed forms need to be signed and dated by the driver and assessor, along with the comments and recommendation. Completed forms should be placed on their training file.
9. Where a driver is repeatedly seen to perform minor issues of a similar nature then referral for re-training may be more appropriate than a re-briefing.
10. In certain instances, the assessor may feel they have concerns over the results of the observations and do not believe they are best placed to decide on the next course of action. In such circumstances they should refer the matter to the MHE instructor for review.
11. If the manager/supervisor believes the driver should not carry on driving until their review has been completed, they can suspend them from driving pending further assessment. Such action should be discussed with the MHE instructor.
12. In very extreme circumstances further investigation including disciplinary action may be appropriate.
13. It must be noted that MHE observation are not a replacement for formal training.



Appendix 1 – Example of Observation / Assessment Criteria

	Observation	Assessment Criteria
1.	Driver gives way to pedestrians	To maintain a safe working environment, drivers should always give way to pedestrians. Observations should note if the driver: <ul style="list-style-type: none"> ➤ was aware of pedestrians when he drove, ➤ slowed down near pedestrians, and ➤ gave way to pedestrians.
2.	Driver looking in the direction of travel	Drivers should always look in the direction of travel. If they have a large load that obstructs their vision they should reverse, looking over their shoulder and take occasional glances to check load security.
3.	Did the driver sound his horn when entering an aisle?	The horn is to warn other drivers and pedestrians that they are present and should not be used as a joke or as a musical instrument. Horn use should be appropriate as overuse can be as bad as not using at all.
4.	Driver speeding or using inappropriate speed for the area observed	The speed of the truck should be judged on the amount of traffic, pedestrians, and obstructions in the area. Drivers should slow down when entering or exiting aisles, approaching, and exiting roller shutter doors, entering congested areas, battery charging areas or areas of poor vision. [List is not exhaustive]
5.	Driver travelling with the forks down, slightly raised off the ground (Safe travel position)	The fork position on trucks for travel with no load should be with the fork heels as low as reasonably practicable, slightly tilted back – the height will differ from warehouse to warehouse due to the condition of the floor. With a load, the fork heels should be as low as reasonably practicable and tilted back. All drivers must ensure that they consider the load and the ground conditions. Travelling with raised forks has the potential to cause a major accident.
6.	Pre-use checks carried out and recorded for the MHE	All trucks require a pre-use check before they are used. The checks should identify any faults and if found, the truck should be defected and not used. Observers should see if a check has been carried out on the truck observed and does it reflect the condition of the truck.
7.	Driver performs any violent manoeuvres – e.g. swerving or harsh braking	This should identify any erratic or dangerous driving. All the controls the driver has over the system should be used smoothly and with confidence. Erratic driving, driving with arms or feet out of the truck, riding the footbrake, harsh acceleration, rough use of hydraulic controls and sharp braking are all misuse of the controls and should be noted.
8.	Driver travelling a safe distance apart from other MHE – as per policies (e.g. 2 bays/3 lengths)	Drivers do not know when the person in front is about to stop so should maintain a safe distance of three vehicle lengths in between trucks.
9.	Driver has the correct and current MHE licence with them	The operative should be trained, authorised and hold the correct certification for the type of MHE being used. It is good practice for the driver to keep a copy of his/her licence/authorisation.
10.	Seatbelt being worn (where appropriate)	Where fitted seat belts should be used. For most truck types e.g. counterbalance, seat belts/restraints will be fitted and must be worn.





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VAT Reg. No. GB 115 5466 23

