

# WALKING A FINE LINE

Recent guidance published by the International Tank Container Organisation (ITCO) serves as a reminder to an enduring safety issue... working at height on the top of heavy goods vehicles. Peter Shakespeare asks: is it still necessary?

**S**lips and falls from cabs, tractor units and trailer load beds can result in injury, sometimes serious. But a fall from several metres higher on the top of a tanker, tipping trailer or the top deck of a car transporter could prove fatal.

"When it comes to the unavoidable need to work on top of a tanker, the driver, loader or mechanic, should be equipped with a safety harness system that enables them to clip themselves on," states Nick Deal, RHA manager for logistics development, who is responsible for its specialist logistics sector groups.

He then immediately qualifies that statement: "But this scenario is deemed the last resort. In terms of delivering product, almost everything is delivered using gantry systems. And sites that have product delivered by tanker are expected by the Health & Safety Executive (HSE) to have engineered out the requirement to get on top of the tank. The RHA's guidance was updated in 2009, in consultation with the HSE, and since then nothing has changed.

"When it comes to ISO tanks, there should be no reason why a driver should need to get on top of it. The tank should have been filled prior to



collection, lifted on to a skeletal trailer, driven to a port, where it is taken off prior to being loaded onto a ship. In the 13 years I have worked at the RHA, I can only think of a handful of occasions when members have contacted us because of disputes with customers who ask drivers to work on tank tops and the member wants clarification on what can and cannot be asked of them. The reason for this is most sites that have product delivered by tank have it delivered all the time and therefore will have gantry systems in place.

"Milk tankers could be an exception as they collect from farms, but they have been bottom-loading and -delivery for many years" (see also pp14-15).

ITCO's July guidance also highlights that it is normal for all loading and unloading to take place within a permanent site gantry. It says that if these operations happen without a gantry, the ISO tank design must feature a wide top walkway that covers a large area of the tank top and be equipped with all-round guard rails, in addition to a fold-out top access ladder, and fixed hand holds. Its guidance is also clear that the people responsible for loading and unloading ISO tanks should be the terminal operators and not the driver of the delivery truck. But it points out that in some countries, it is normal for drivers to be expected to perform these



**WARNING** !

Working on top of tankers is discouraged, but, if unavoidable, trained operators need a fall arrest system and act according to results of a risk assessment.

A new official code of practice for such work is due to be released by the end of 2020, replacing SIM 5 [Sector Information Minute 05/2007/03], according to Simon Scaife, director of Vehicle Transporter Training Limited. One of the few accredited training providers in this field, Scaife is also a consultant for the HSE and the DVSA in related matters.

He says: "I set up the business because there was no accredited training for the vehicle logistics sector. We are affiliated to the CILT and have now got our training Driver CPC accredited. Working closely with the HSE and DVSA, we have brought them and the industry much closer together. And now, rather than hit operators over the head with a big stick when things go wrong, they want to work with them to help find solutions. Previously the only qualification you needed to drive a car transporter and work at height was an HGV driving licence.

He continues: "When it comes to working at height on a car transporter, each time there is an accident and a driver falls off, there are calls that they must wear harnesses and be clipped on. It is not possible to do this safely or effectively on a transporter, and HSE have now agreed that due to the configuration of top deck of most car transporters and the nature of the work [climbing into and out of vehicles] this is the case."

Scaife explains that with the preferred wagon-and-drag type 11+ car

operations. If it is the case a driver finds themselves in this situation abroad, a full risk assessment must have been carried out and operation specific training provided.

The RHA's own data collated from its tanker operator members between 2000 and 2008 shows that injuries sustained from falls from tankers of all types reduced significantly over the period. While reportable cases of death and serious injury were relatively low, all were preventable. The main cause was where handrails were either deployed incorrectly or they failed. During the period 2019/20, HSE data tracking all causes, shows 11 people died as a result of a workplace accident in the transport sector. Data tracking fatalities since 1981 confirms numbers have consistently fallen and since 2014 have stabilised at a low, but still unwanted, level.

What is clear from HSE's statistics is the construction sector is the most

dangerous. This said, as far as falls from construction vehicles are concerned, safety requirements imposed by construction site operators have almost eliminated the need for drivers to leave their cab. This is thanks to automatic tail gates, travelling floor and ejector trailers and remotely-operated mechanical sheeting systems.

**CAR TRANSPORTER SAFETY**

One road transport sector where working at height cannot be engineered out is vehicle transport. Most car and van transporters are double-deck. When loaded, these vehicles deliver to car and van dealerships in every conceivable location. Regularly having to offload vehicles on busy roads next to the dealership, the driver has no other option than to walk up the top deck to release load restraints and climb into the vehicles and drive them down the ramp.

**THE RISK ASSESSMENT**

In all scenarios, a thorough risk assessment should be carried out, points out the ITCO document (pictured). These should be carried out by site and vehicle operators. RHA says that relevant details include: height of the working position, top loading being the most critical aspect; frequency of access required; nature of the task to be performed; any equipment that needs to be carried or handled; the actual location where activity is to take place. The above would also need to include exposure to the elements. Other factors to keep in mind: operating procedures; maintenance procedures; supervision; experience and training of individuals concerned; PPE equipment, like correct supportive, non-slip footwear.



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Simon Scaife

transporter, the driver has to cross the gap between trailer and the vehicles on the top of the prime mover, so there is no way of having a continuous safety wire to clip on to. In addition, they have to get in and out of the loaded vehicle to drive them on and off.

“There are safe ways of working at height on transporters and understanding these is down to a thorough knowledge of the working practices required and proper training. But sadly, the vast number of accidents are due to a lack of training, or hand-me-down training from when the company owner was a driver themselves. In terms of RIDDOR reportable accidents, there are not that many each year. But in terms of incidents that don’t get reported, there are several. Most incidents result from slips on wet decking that result in a fall. But we do have accidents that result from metal fatigue.”

Scaife explains that car transporter top decks must be permanently fitted with a safety hand rail, but because they run close to maximum height, the passenger side of the vehicle can suffer from a battering by overhanging trees, which bends the hand rail posts and in the worst case, sometimes writes the load off.

He says that during the pandemic councils have not been cutting the trees



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back and there have been a couple of recent cases where drivers have gone up to straighten bent handrail posts, which snapped off in their hands, causing them to lose their balance and fall off. But he adds that while the damage to handrails can often not be avoided, thorough training would have made these drivers aware of the risk they were exposing themselves to, by trying to fix it while over 11 feet off the ground.

It is evident that design, technology, better collaboration better industry and the authorities and a much-improved general awareness around safety has

considerably reduced the risk while working at height. The overarching message is to engineer out the requirement, but if an unavoidable last resort, before climbing on top of a vehicle, the task should be properly risk-assessed and the driver properly equipped and trained to carry it out. After all, one dead or seriously injured driver is one too many. **TE**

**FURTHER INFORMATION**

- ITCO advice (2020) - [www.is.gd/odaver](http://www.is.gd/odaver)*
- SCOPA advice (2017) - [www.is.gd/wehala](http://www.is.gd/wehala)*
- RHA advice (2009) - [www.is.gd/forema](http://www.is.gd/forema)*

**RHA'S WORKING AT HEIGHT HIERARCHY OF CONTROL**

RHA guidance says that the main way to ensure safety is to not get on top of a tanker or high vehicle body in the first place. It follows that the hierarchy of control should be used to determine the most safe and practical method used in all cases. Namely:

- Eliminate the need to access the tops of tankers, for example by bottom loading

and discharge facilities, or in some cases remotely-operated lids on tankers (popular in the vacuum waste sector)

- Where access to the top of tankers cannot be eliminated, ensure that fixed gantries are provided at loading and discharge facilities that incorporate secure fencing on all sides of the high-level

working position from which a person could fall

- Where fixed gantry loading/unloading is not reasonably practicable – and tank top access cannot be eliminated – ensure that secure fencing is provided to all sides of the walkway of the road tanker
- Use of personal fall restraint – or fall arrest systems – should

be seen as the last resort, or used as an interim solution Where used, rigorous controls and training measures need to be applied to support this.

- Written copies of the risk assessment should be made available to the relevant employee and customers. Employees should be given instruction and training.