

## ESTATES OPERATIONS

HEALTH & SAFETY DOCUMENT

CODE of PRACTICE

DOCUMENT

FORKLIFT TRUCKS &  
PALLET TRUCKS

ISSUE DATE & VERSION

APRIL 2018 v1.4

**Please Note** – the guidance provided in this Code of Practice pertains only to the Estates Operations Group and its activities. For Imperial College’s Health & Safety policies and Codes of Practice go to: <https://imperial.ac.uk/safety>.

### INTRODUCTION

This Code of Practice sets down the standards for the management of the use of forklift trucks and pallet trucks. It is intended to assist in meeting the requirements of current legislation and sets out procedures on how to achieve safe environments for College staff, students and visitors.

Over and above the general duty of care owed by the College to its staff, students and others under the Health and Safety at Work Act 1974, all work relating to the use of forklift trucks is legislated by the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER). The use of pallet trucks is legislated by the Provision and Use of Work Equipment Regulations 1998 (PUWER).

This Code of Practice provides the following:

- A definition and the scope of the applicable Regulations
- The duties imposed on the employer / employees / other
- Inspection Guidance
- Responsibilities of duty holders and employees
- Competence
- Training Requirements
- Guidance Documents at [Appendix 1](#)

### 1. Overview and Introduction to Forklift Trucks & Pallet Trucks

[Lifting Operations and Lifting Equipment Regulations 1998](#) places duties on any person who uses, supervises, manages or has any control of equipment used for lifting or lowering loads at work (either objects, persons or animals). The regulations state that lifting equipment must be positioned and installed so as to be safe. It must be of adequate strength and stability and clearly marked with its safe working load. In addition, any load parts or attachments used in the lifting operation must also be of adequate strength and marked with any information necessary to ensure their safe use. The regulations require that all lifting operations must be properly planned by a competently trained person, appropriately supervised and carried out in a safe way.

[Provision and Use of Work Equipment Regulations 1998](#) places duties on any person who uses, supervises, manages or has any control of equipment used for work purposes. The regulations state that every employer shall ensure that work equipment is so constructed or adapted as to be suitable for the purpose for which it is used or provided.

Every employer shall ensure that work equipment is used only for operations for which, and under conditions for which, it is suitable. The regulations require that work equipment is maintained in an efficient state, in efficient working order and in good repair and any

maintenance carried out is logged. The regulations also require suitable inspections at regular intervals if machinery is likely to suffer from deterioration or if work equipment depends on the installation conditions.

## 2. Duties Imposed on the Employer/Employees/Others

The Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) introduced new requirements for the safe provision and use of lifting equipment. Regulation 9 of LOLER requires that all lifting equipment provided for use in work activities are thoroughly examined by a competent person at regular intervals. This applies to forklift trucks used to lift people or loads. We have a responsibility to ensure that all operations involving forklift trucks that could result in injury are assessed and adequately controlled. To this end suitably competent persons are employed to carry out the actions below.

We shall ensure that;

- A suitable and sufficient risk assessment is carried out involving forklift trucks and pallet trucks. Estates Facilities have produced a [Code of Practice on Risk Assessment](#) which must be followed.
- Lifting equipment should be inspected if the risk assessment identifies any significant risk to operators and others from the equipment's use. The result of the inspection should be recorded and this record should be kept at least until the next inspection of that equipment.
- Lifting equipment that requires inspection should not be used, unless the inspection has taken place. Where it leaves our undertaking, or is obtained from another (e.g. from a hire company) it should be accompanied by physical evidence of the last inspection, such as an inspection report.

## 3. Inspection Guidance

The level of inspection required will depend upon the type of lifting equipment being used, its use, and the conditions to which it is exposed. This will be determined through the risk assessment process and the use of manufacturer's guidelines and recommendations.

Any inspection should concentrate on the safety-related parts which are necessary for the safe operation of the lifting equipment. Further guidance is provided in [Appendices 2 & 3](#) of this Code of Practice, however in summary the types of inspections required include:

- Pre-use checks before use ([please see Appendix 2](#))
- Weekly/monthly inspections
- More extensive thorough examinations (six monthly thorough examination by a competent person)

Thorough examinations will need to be undertaken by a competent person. The definition of what constitutes a 'competent person' is identified in Section 5 below. Such an inspection will involve a systematic and detailed examination of the forklift truck and all its associated equipment. To determine the extent of any thorough examination, the competent person will assess the risks, considering factors such as where the forklift truck is to be used, frequency of use, age and condition, and the weight of loads to be lifted.

In summary it is a legal requirement that all forklifts are thoroughly examined:

- After substantial and significant changes have been made;
- At least every **six months**;
- Following 'exceptional' circumstances such as damage to, or failure of, the forklift/pallet truck, long periods out of use or a major change in operating conditions which is likely to affect the integrity of the equipment.

Further information on what is to be included within a thorough examination is contained in [Appendix 3](#) to the rear of this Code of Practice.

For hand operated pallet trucks a thorough examination is not necessary. However a formal safety inspection will still be required on at least an annual basis by a competent person.

#### **4. Responsibilities of Duty Holders and Employees**

We have a responsibility to ensure that all operations involving forklift trucks and pallet trucks which could result in injury are assessed and adequately controlled. To this end we appoint suitably competent persons to carry out the actions below.

- maintaining the forklift/pallet truck so that it is safe to use;
- selecting and instructing the competent person;
- ensuring that the forklift is examined at statutory intervals (every six months) or in accordance with an examination scheme drawn up by a competent person, with pallet trucks formally inspected at least once every 12 months;
- keeping the competent person informed of any changes in the forklift/pallet truck operating conditions which may affect the risk assessment;
- making relevant documentation available to the competent person, e.g. manufacturer's instructions and maintenance records;
- acting promptly to remedy any defects;
- ensuring that all documentation complies with the Regulations; and
- record keeping.

Employees and students have a responsibility not to undertake any activities on forklift trucks and pallet trucks that may cause themselves or others harm and adhere to the information, instruction and training provided. They must immediately bring instances having the potential to cause harm to the attention of their immediate line manager.

#### **5. Competence**

A 'competent person' is someone who has sufficient technical and practical knowledge of the forklift or pallet truck to be able to detect any defects and assess how significant they are. It is also important that the competent person is sufficiently independent and impartial to allow them to make an objective assessment of the lifting equipment. For this reason, it is not advisable for the same person who performs routine maintenance to carry out the thorough examination, as they are then responsible for assessing their own work. The College will utilise an external company to act as the competent person, ensuring they meet the above criteria. The competent person will understand what is meant by a 'thorough examination' and what the law requires. Accreditation by the United Kingdom Accreditation Service to the relevant standard (BS EN 45004) is an indication of the competence of an inspection body.

#### **6. Training Requirements**

##### **Forklift Trucks**

Guidance on the use of forklifts state that children under the minimum school leaving age should never operate forklift trucks.

The law requires forklift truck operators to be trained. Regulation 9 of the Provision and Use of Work Equipment Regulations (PUWER 98) states that every employer shall ensure that all persons who use work equipment have received adequate training.

Adequate training means sufficient for the job which, for forklift truck operators at the College, will be measured in days rather than hours.

The training of operators includes three stages:

1. **Basic Training**; the basic skills and knowledge required for safe operations.

2. **Specific Job Training;** knowledge of the workplace and experience of any special needs.
3. **Familiarisation Training;** operation on the job under close supervision.

Different training will usually be required for different types of forklift truck. On completion of training the operator will be given a certificate. This will show the type of truck that he or she may operate.

The operator should receive training on each type of equipment he or she may be required to operate. Such training may be provided by an in-house College instructor or an external trainer. The training provider should then issue a certificate, or other document, giving details of the results of that training. This document is not a licence.

The College is required to give written authority for any member of staff to actually operate the equipment. If an individual document is issued this is the closest document to a licence, but it is not a licence. The College alone will determine how long this authority remains valid but it is good practice to ensure that the performance of all operators is formally monitored.

There is no legal requirement for forklift truck operators to receive routine refresher training. Such training may be needed in certain circumstances.

In addition to routine monitoring formal re-assessment is likely to be needed where operators:

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

The Forklift Truck Association (FLTA) advises that refresher training, if required, should not follow a set programme. It should be designed to overcome the weaknesses highlighted by the monitoring/assessment process.

## **Pallet Trucks**

Regulation 9 of the Provision and Use of Work Equipment Regulations 1998 (PUWER 98) makes it very clear that an employer must provide adequate training for all persons who use work equipment. This includes training in how the equipment should be used, the risks involved and precautions to be taken.

The same regulation makes it clear that those who supervise or manage the use of such equipment must also receive adequate, similar training.

All the various types of hand controlled pallet trucks would fall into this category, from the simple manual pump truck through to quite complex electric counterbalance stackers. The degree of training required, and the time it will take, will vary according to the type of equipment and the tasks to be performed.

For the more basic equipment it may be possible to provide in-house training. This still needs to be properly organised and formally recorded. If in any doubt the College will seek professional advice.

## **Appendix 1 - Guidance Documents Available**

### **Simple guide to the Lifting Operations and Lifting Equipment Regulations (HSE)**

These guides provide information about the legal requirements of the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) which came into force on 5 December 1998.

It gives a general indication of some of the main requirements of the Regulations. The guidance documents are available at the following link:

<http://www.hse.gov.uk/pubns/indg290.pdf>

### **Thorough Examination of Lifting Equipment**

The following link provides guidance on the Thorough Examination of Lifting Equipment:

<http://www.hse.gov.uk/pubns/indg422.pdf>

### **Safety in Working with Lift Trucks**

Further guidance can be obtained from the below link:

<http://www.hse.gov.uk/pubns/priced/hsg6.pdf>

### **Rider Operated Lift Trucks: Operator Training**

Further guidance on what training should cover is available from the below link:

<http://www.hse.gov.uk/pubns/priced/l117.pdf>

### **Fork Lift Truck Association**

Further guidance can be obtained on the use and maintenance of forklifts from the Forklift Truck Association, accessed via the below link:

<http://www.fork-truck.org.uk>

### **Pallet Trucks**

Further information on the training requirements for using hand powered pallet trucks can be obtained from the below link:

[http://www.fork-truck.org.uk/web\\_images/manuals/factsheets/FS09.pdf](http://www.fork-truck.org.uk/web_images/manuals/factsheets/FS09.pdf)

## Appendix 2 – Forklift Truck Pre-Use Checklist

Truck No: \_\_\_\_\_ Serial No: \_\_\_\_\_ Week Beginning: \_\_\_\_\_

**Operators should carry out these checks in accordance with the Manufacturers' Guidelines.**

Name of Operator: \_\_\_\_\_

Mark 'Yes' if satisfactory.

Mark 'No' if further action required.

DATES							
<b>Pre-Use Checks:</b>							
<b>Forks/Attachments</b>							
Cracks/Damage							
Carriage							
Adjustment Pins							
Load Guard							
Mast Rollers							
Lift Chairs							
Capacity Plate Visible							
<b>Tyres</b>							
Pressure/Damage							
Wheel Nuts							
<b>Lubricants</b>							
Fuel							
Engine Oil							
Hydraulic Oil							
Brake Fluid							
Water							
<b>Lights</b>							
Front Lights							
Brake Lights							
Flashing Beacon							
<b>Hydraulics</b>							
Lift							
Lower							
Tilt							
Side shift							
Leaks							
<b>Driving</b>							
Operator's Seat							
Steering Gear							
Mirrors							
Footbrake							
Handbrake							

**Comments/Further Action Required:**

## Appendix 3 – Thorough Examination of Forklift Trucks

A thorough examination is a systematic and detailed examination of the forklift and all its associated equipment by a competent person. Its aim is to detect any defects which are, or might become, dangerous, and for the competent person to report them to the duty holder (the College) and, if appropriate, the enforcing authority (the Health and Safety Executive or local authority) so that appropriate remedial action can be taken.

To determine the extent of the thorough examination, the competent person will assess the risks, considering factors such as where the forklift will be used, frequency of use, age and condition, the weight of loads to be lifted, etc.

A thorough examination may include some testing, if the competent person considers it to be necessary. The competent person will normally determine what tests are required, taking account of the relevant guidance and standards, and the College will insist on this approach.

Thorough examination may also be supplemented by inspection. Inspections should be carried out at suitable intervals between thorough examinations by a competent, trained employee. Inspections would normally include a pre-use check (please refer to [Appendix 2](#) of this Code of Practice). Thorough examination should not be confused with preventive maintenance, although they have some elements in common. Preventive maintenance usually involves replacing worn or damaged parts, topping up fluid levels and making routine adjustments to ensure risks are avoided. Thorough examination may act as a check that maintenance is being carried out properly, but is not intended to replace it.

### Frequency and Conditions for the Thorough Examination

The law requires that all forklifts when in use should be thoroughly examined:

- after substantial and significant changes have been made;
- at least every six months if the forklift is used at any time to carry people, every twelve months if it only carries loads, or in accordance with an examination scheme; and
- following 'exceptional circumstances' such as damage to, or failure of, the forklift, long periods out of use or a major change in operating conditions which is likely to affect the integrity of the equipment.

### Thorough Examination Documentation

The competent person is legally required to send the College a written and signed report of the thorough examination as soon as practicable. This should normally be within 28 days, but if there is a serious defect which needs to be addressed, the report should be received much sooner. If the competent person identifies a defect which presents an 'existing or imminent risk of serious personal injury' they are also legally required to send a copy of the report to the enforcing authority. By law, the report must contain certain information, specified in LOLER.

In summary, it should:

- identify the equipment examined (serial number, make, etc.), the employer and the premises;
- give the date of the last thorough examination and specify when the next one should take place;
- specify the safe working load of the forklift;
- give the reason for the thorough examination (i.e. according to an examination scheme, statutory interval, etc.);
- identify any defect which is or may become a danger to people;
- give the details of any repair, renewal or alteration required to remedy the defect and the date by which it should be undertaken;
- give details of any tests carried out;



- give details of the person carrying out the report and the person validating the report on their behalf.

If the report does not contain all the information above, the College should not accept it, as this may place the College in breach of the law. In this scenario the College is to try and resolve the matter with the competent person, but if this is unsuccessful the College should contact the local enforcing authority for advice.