



SAFETY ASSESSMENT
FEDERATION

Guidance

Use Of Working Platforms (Non-Integrated) On Forklift Trucks

Work at Height Regulations (WAHR) 2005 and
HSE Guidance Note PM 28 [4th edition] April
2013 — Working platforms (Non-
integrated) on Forklift trucks

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DEFINITION

Definition of a 'Non Integrated Working Platform'

An attachment for use in conjunction with forklift trucks to elevate people so they can work at height but they have no controls in the platform that allow a person in the platform to control the lift height of the platform or move the truck i.e. all the truck and platform movements are controlled by the truck operator.

Non-integrated work platforms can be attached and detached from the fork lift truck to allow flexibility of use.

Note: This guidance should be read in conjunction with the working at height regulations and HSE guidance note PM28

Legal Considerations and the HSE position

Non integrated working platforms were specifically excluded from the Supply of Machinery (Safety) Regulations 1992 as amended (EC Machinery Directive) and, therefore, they can not carry the CE mark. However, unusually this does not mean that they can not be manufactured and supplied for use at work, provided they meet other more general criteria, e.g. HSWA 1974 s2(2)(a) & s6 etc. Indeed there was some argument over whether the exclusion from the Machinery Directive was appropriate as this had the effect of banning such use in certain countries with the result in an increase of accidents caused by falls from other less safe methods of access (e.g. ladders).

The use of non-integrated work platforms is regulated by the more general requirements of risk assessments, safe working practices and duty of care provisions of the regulations, such as the Work at Height Regulations (WAHR) 2005. The overriding principle is to do all that is reasonably practicable¹ to prevent anyone falling [WAHR 2005 R6 (3)]. In particular WAHR R7(b) places a duty on employers 'to select the most suitable work equipment for the task to be carried out regardless of duration of the task ...' Guidance is also offered in HSE Guidance Note PM 28 concerning work platforms on fork lift trucks as follows:

- Paragraph 3: Primarily, forklift trucks are intended for lifting materials and not people. However, they can be used with work platforms to allow people to work at height. It is generally accepted that, in conjunction with a forklift truck, an integrated platform provides a higher level of safety than a non integrated type. Nevertheless, a non integrated working platform may be used when it provides a safer means of access than, for example, improvised stairs or platforms or a ladder that would otherwise be used and it is impracticable to use an integrated platform
- Paragraph 12 relates to WAHR Reg. 7(2)b and in particular the selection of the most appropriate and safe equipment to access work at height:

To encourage safer working practices, in (these) exceptional circumstances, occasional use of non integrated working platforms with fork lift trucks is allowed in the UK in accordance with this guidance.

Paragraph 13 gives examples of occasional use:

- A.** Non routine maintenance tasks for which it is impractical to hire in purpose built access equipment

- B. The replacement of light fittings in high rise warehouses if the task is not carried out as part of periodic maintenance operations
- C. Tasks which would otherwise be carried out using less safe means of access such as ladders, because it is impractical to hire in purpose designed people lifting equipment due to the short duration and occasional nature of the task
- D. Checking on high level damage to racking suspected of causing an immediate risk or checking on the condition of roof lights.

The examples given above do not constitute an exhaustive list and indeed do not cover the frequency of operation. The Lifting Operations and Lifting Equipment Regulations (LOLER) (regulation 9) requires lifting equipment for lifting people, which includes trucks and working platforms used to lift people to be thoroughly examined by a competent person at least once every six months or in accordance with an examination scheme.

Practical Use

From the above it is recognised that, in certain scenarios, the use of non integrated working platforms is acceptable. In such scenarios, where non integrated platforms are considered the most appropriate and safe method of gaining access and used, it is essential to establish safe working practices and control measures to reduce the risk of accidents. This is particularly important as it is likely that the equipment and operator will be provided by the site and such tasks may be unfamiliar. Specifically the following should be addressed to establish the procedure for safe working:

- Risk assessment to identify hazards, risks, control measures for safe working and all options for accessing height are considered.
- Prior to use check all equipment, attachments, harnesses and fixings to ensure safe and secure operation
- Communication between operator and user to explain the task involved, establish the competence of the operator to perform the task, communication process, any signs or hand signals, emergency procedures etc and a clear understanding of the requirement and responsibilities.
- Ensure that the minimum amount of time is spent working at height

Conclusion

SAFed member policy concerning the use of non integrated work platforms is that they are acceptable provided that after taking into account the working at height activity and the methods of access that they have identified this as the safest method of accessing the working at height work activity and that suitable control measures are taken to ensure continued safe working practices.