

WAREHOUSING AND DISTRIBUTION

The Key to Successful
Safety Compliance





Change always brings challenges – and the UK’s online shopping revolution is no exception. Growth in warehouse and distribution centres has been matched by a corresponding jump in fines for health and safety infringements.

Since ‘new’ sentencing guidelines¹ were introduced in February 2016, there have been much harsher penalties imposed on businesses with 19 fines reaching £1m or more - three of which resulted in £3m² - highlighting an appetite and willingness for the courts to punish infractions and to deter business from merely paying lip service to health and safety law.

The potential for punitive fines makes the argument for establishing robust warehouse safety management all the more compelling for operators.

This e-guide takes you through the key areas to consider when devising a safety strategy and offers tips and advice on best practice. If you have any questions about health and safety in warehousing and distribution, please do not hesitate to contact us.



SECTION ONE

LAYING PROPER FOUNDATIONS: RISK ASSESSMENTS AND COMPETENT STAFF

Strong health and safety management starts with an audit and risk assessment of your current working practices. If you employ five or more people you need to keep a written record of your findings.

The assessment should take into account:

- What tasks are being carried out and the potential hazards they pose – for example, vehicles moving about the warehouse, lifting and carrying, working at height and falling objects
- The risk of someone being harmed by these hazards and how serious that harm is likely to be
- Who is most likely to be affected – for example, employees, contractors, visitors and so on
- What safety provisions are already in place and how they can be improved
- Accident and sickness records, which may highlight a recurring issue
- The views of employees, including supervisors and union reps
- Ancillary tasks, such as cleaning and equipment maintenance

The next step is to use the findings to decide what further action needs to be taken, such as training or modifying equipment, and to appoint competent people to get this done. The risk assessment should be reviewed regularly, as well as whenever there is a safety-related incident. Employees need to be kept informed of any alterations.

The need for competent staff

As part of your risk-assessment, you will need to assess employees' competence to do their jobs. This means their level of training, experience and skills. Doing this will help you decide what further information, instruction and supervision may be required. For example, workers whose first language is not English may require extra training and pictorial signage.

The law requires that employers provide adequate health and safety training to enable staff to do their jobs safely, particularly if they are new to a job or process or need to update their skills. This applies to self-employed workers and contractors, as well as PAYE employees.

Some employers use a health and safety passport scheme to show that employees have received basic health and safety awareness training. You can find out more about these at [hse.gov.uk](https://www.hse.gov.uk).

SECTION TWO

WHEN AN EMPLOYEE IS NOT AN EMPLOYEE: MANAGING CONTRACTORS

As an employer, you have a legal responsibility to ensure the safety of all your workers, even if they are contractors or agency staff³.

Before taking on a contractor, it is recommended that you do an assessment of the health and safety implications of the work required and share this with the contractor before the job begins. Areas that need special attention include working at height, for example on roof repairs, and tasks involving vehicles, such as forklift trucks, as these are common factors in warehouse accidents.

Ensuring contractors are competent

Just as you need to be sure your own employees are competent, you need to check that contracted staff have the appropriate skills, training and knowledge to undertake the work required safely.

In the event of an accident, it is advisable that you can show due diligence in choosing your contractor and assessing contract workers' competence. So check:

- Risk assessments and method statements for the job
- References for similar work
- Arrangements for managing and supervising the work
- Whether subcontractors will be used and, if so, whether they pass your competency tests
- The contractor's health and safety record and policy and qualifications
- Insurance held

You will also need to consult your own employees about working safely alongside contracted staff and, if necessary, introduce additional safeguards.



SECTION 3

ACCIDENT BLACKSPOT: RACKING

With falls from height accounting for around a third of workplace deaths, stock falling from racking or its collapse are major safety concerns in warehouses⁴.

Thorough racking inspections should be made at least once a month by a competent person, who should check for signs of damage and that load capacities are being observed. Particular attention should be given to damage to the uprights through careless forklift use, which can affect the integrity of the whole racking structure. Managers also need to ensure that access to racking is kept clear and there is sufficient space for pickers and fork lifts to manoeuvre safely.

Racking safety tips:

- Set up a reporting system so staff can log damage
- Ensure racking is anchored securely and spaced to allow easy access
- Provide aircraft-style step ladders if necessary and include them, along with other equipment, in your regular inspections
- Ensure lighting is adequate and floors are not slippery or uneven
- Do not allow pedestrians and forklifts in aisles at the same time
- Do not use pallets on forklifts as work platforms

Case study: Racking collapse

A worker was trapped for more than nine hours after racking collapsed in a cheese warehouse. With each pallet carrying approximately 1,300kg of cheese, the case shows the importance of having racking designed, installed and inspected by competent professionals.



SECTION 4

ACCIDENT BLACKSPOT: FORKLIFTS, REACH TRUCKS AND SIDeloadERS

Around a quarter of workplace transport accidents involve forklift trucks⁵. And employers have a duty to enforce safe driving behaviour.

Pedestrians and forklifts are an especially dangerous combination and should be given clearly marked, separate routes wherever possible. If necessary, temporary barriers can be used to keep forklifts and people apart, for example in aisles where pickers are at work.

Forklift operators need regular training on the specific type of truck they operate and refresher courses every three to five years – in fact, suitable training is required by law. The training should include safe loading of racking to reduce the danger of goods falling from bays. Forklifts must be well maintained and inspected regularly, including at the start of each shift, and any issues should be logged immediately.

Although still not a statutory requirement, there is increasing pressure across all sectors for employers to enforce the use of seatbelts at all times to reduce the risk of drivers being crushed by

forklifts in the event of overturn. This means incorporating the requirement in the company health and safety policy, using appropriate signage and providing verbal reminders.

Forklift safety tips:

- Keep pedestrians and forklifts apart
- Ensure drivers wear a seatbelt and are properly trained
- Fit speed limiters and reversing beepers on forklifts
- Display speed limits signage
- Conduct pre-use inspections
- Make sure routes are well lit and marked, have an even surface, are free of obstructions and have protective barriers around doorways that open directly onto vehicle routes
- Ensure forklifts are only driven in designated areas and with forks lowered

Case study: Wilko forklift accident

Retailer Wilko was fined £200,000 after an employee was crushed to death between two forklift trucks in 2011. An investigation found that particular driving practices and a lack of enforcement in the use of seatbelts were key failings in this case.



SECTION 5

ACCIDENT BLACKSPOT: LOADING AND UNLOADING

Loading and unloading presents various potential hazards, including falling loads, workers falling from loading docks or vehicles, pedestrians being struck by goods and visiting drivers who are unfamiliar with your procedures.

In particular, accidents can be caused by vehicles moving away from loading bays unexpectedly, badly designed or misused dock levellers and tail lifts, incorrect loading and careless retrieval of goods.

Loading and unloading safety tips:

- Loading areas should be level, well lit and clear of pedestrians, other traffic and obstructions – including hazards such as overhead cables

- Ensure vehicles and trailers have their brakes applied and stabilisers in place to avoid creep
- Provide a safe place where drivers can wait and provide instructions in advance if they are required to load/unload goods
- Prevent vehicles from being driven off too soon by using traffic lights, restraints and/or holding keys elsewhere
- Check dock plate and vehicle load capacity
- Have a “walk, don’t run” policy in the loading area

Case study: Decco warehouse fall

In 2016, wholesaler Decco was fined £2.2 million after an agency worker died in a fall from a loading platform. The accident could have been prevented if a fault to a gate had been identified and the employee had received instructions on using the gate.

SECTION 6

ACCIDENT BLACKSPOT: DRIVING AT WORK

Up to a third of all road traffic accidents involve somebody who is at work at the time⁶.

As an employer, you are responsible for taking steps to ensure the safety of workers who drive as part of their job, so this should be part of your risk assessment. This applies to contract and agency workers, such as delivery drivers, as well as employees who use their own or a hired vehicle⁷.

Consider in your health and safety policy:

- Journey planning – routes, weather conditions, rest breaks

- Vehicle condition – free from defects, insured for business use and MOT’d.
- Driver suitability – fitness and required level of training.

Driving safety tips:

- Check drivers’ references, licences and certificates
- Ensure drivers carry out routine safety checks, for example on lights, tyres and wheels, and report faults immediately

- Include breakdown procedure in training
- Ensure drivers have appropriate eye sight and complete health surveillance questionnaires
- Download and check data
- Operate a strict hands-free only mobile phone policy or ban mobile phone use in vehicles altogether



SECTION 7

ACCIDENT BLACKSPOT: MANUAL HANDLING

Manual handling is responsible for more than a third of all workplace injuries, according to HSE. These range from back and joint pain and repetitive strain conditions to loss of fingers and limbs – and account for many lost working hours.

Consulting workers about the best ways to handle stock will result in some practical suggestions and help to get staff to take health and safety concerns seriously.

Manual handling safety tips:

- Avoid manual handling where possible by use of mechanised lifting equipment or mechanical handling aids.
- Provide training on manual stock picking and carrying safely
- Separate manual pickers and vehicles at all times
- Ensure workers use the mechanical handling aids provided and that they are well maintained
- Stock the heaviest goods on lower shelves
- Keep aisles and walkways free of clutter



SECTION 8

UNDERSTANDING THE PSYCHOLOGY OF MISTAKES: BEHAVIOURAL SAFETY

Developing a health and safety policy is not a one-off task – it is an evolutionary process that may require trying out different approaches. Behavioural safety is a strategy that attempts to deal with the problem of human error – something that HSE estimates contributes to some 80 per cent of work-related accidents⁸.

Safety-related mistakes fall into three general categories:

SLIPS OR LAPSES IN CONCENTRATION

Such as picking the wrong item or missing a step in a procedure

ERRORS OF JUDGEMENT

For example, doing the wrong thing believing it to be right, possibly due to lack of training

VIOLATIONS

Deliberate departures from procedure, perhaps as a result of peer pressure, lack of understanding or poorly designed equipment or processes

Unlike traditional safety techniques, which tend to focus on tangible factors such as equipment and procedures, behavioural safety examines the psychology behind the way workers behave. In simple terms, it involves setting up a programme of in-house observation and reporting in order to find out how tasks are being done and how they can be made safer.

It can be used to identify warehouse safety issues such as:

- Cutting corners to save time or effort
- Insufficient training
- Unsuitable tools or equipment
- Lack of concentration due to tiredness or excessive noise and so on

To be successful, a behavioural safety programme needs to have the support of senior management as well as the workforce, who need to feel fully engaged in the process.

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