

SAFETY AT 'BRING-SITES' IN THE WASTE MANAGEMENT AND RECYCLING INDUSTRY

This guidance has been developed by the Waste Industry Health and Safety (WISH) Forum to help control safety and health risks in the waste management industry associated with bring sites. The Health and Safety Executive (HSE) was consulted in the production of this publication. It endorses the sensible, proportionate, reasonable and balanced advice to owners on managing the risk from this guidance during the waste-related activities as set out in the guidance.

This document provides advice on how to assess the main risks associated with transport movements, mechanical lifting operations, slips trips and falls, and manual handling at bring-sites (a facility where members of the public can deposit recyclable materials). Such bring sites are often located in supermarket car parks, leisure centres, public car parks and similar locations open to members of the public. This public access can pose safety risks, in particular when receptacles (waste containers of various types such as bottle banks, clothing banks etc) are being serviced, emptied or collected.

It provides guidance on reasonably practicable measures that can be introduced to eliminate or reduce these risks for employees, contractors and members of the public.

This guidance is aimed at designers of bring-sites, their owners and those in control of land with a bring-site/s on it, managers and supervisors of those who service (collect wastes from) these sites, and employers with responsibilities for them.

Contents

1. Introduction
2. Associated risks
3. Assessing the risks
4. Public safety
 - Transport movements
 - Slips, trips and falls
 - Manual handling
5. Safe worker
 - Safe equipment
 - Mechanical lifting operations
 - Falls from height
 - Personal protective equipment
 - Training, instruction and supervision
 - Monitoring
6. Worker consultation and engagement
7. Further reading
8. Further information

1. Introduction

1.1 This guidance was produced by the Waste Industry Safety and Health (WISH) forum in consultation with the Health and Safety Executive (HSE).

1.2 In this guidance, a bring-site is defined as any facility (usually unstaffed) where members of the public can deposit recyclable materials such as glass, cans, plastics, paper, textiles, shoes etc. Such facilities are often located in supermarket or other car parks, village hall areas, public house car parks and similar. Manned civic amenity sites are specifically not included as they are covered by separate guidance (see further reading section below).

1.3 The guidance is aimed at:

- Designers
- Owners and those in control of land with bring-sites
- Managers and supervisors of those who service these sites (eg receptacle replacement/transfer)
- Employers with responsibilities for such sites

1.4 Many bring-sites are situated in supermarket/retail or local authority car parks, although some can be found in other locations. The location of the site will inevitably have an impact on the design and layout.

1.5 For operators, owners or those designing the layout and contents of a bring-site, the risks associated with your particular site, and the methods of reducing those risks, should be revealed during your risk assessment (see below).

1.6 Depending on your responsibilities, this guidance may also help you to devise, put in-place, monitor and revise methods of work at bring-sites.

2. Associated risks

2.1 The main risks to employees, contractors and members of the public visiting bring-sites include:

Transport:

- The movement of private vehicles (belonging to members of the public)
- Risks during reversing of private and commercial vehicles
- Collisions between moving vehicles, and between vehicles and pedestrians

Mechanical lifting operations:

- Risks of collisions between hoisted receptacle and other obstructions (parked cars, overhead power lines etc)
- Risks to members of the public during hoisting

Slips, trips and falls:

- The condition of the ground where pedestrians are expected to walk
- Risks caused by poor visibility (eg use at night)
- Risks caused by weather conditions (eg ice, snow, standing water, high winds)
- Risks caused by the design, location and maintenance of access structures where they are provided (eg steps, gantries etc)

Manual handling:

- The distances the public have to carry items
- Ergonomic risks caused by excessive reaching, stretching and stooping by the public when depositing recyclables

3. Assessing the risks

3.1 To effectively manage health and safety employers and self-employed people are required to carry out a suitable and sufficient risk assessment of their activities.

3.2 Your risk assessment will help you to:

- Identify the hazards that can cause harm
- Decide who is at risk, eg workers, contractors, subcontractors, agency and temporary workers, or members of the public
- Assess the risks from those hazards
- Eliminate or reduce risks (by using appropriate control measures), so far as reasonably practicable
- Record any significant findings

3.3 Your risk assessment should be regularly reviewed to ensure that any control measures put in place remain effective. When reviewing, you should consider the following:

- Is the site design and layout the best that is reasonably practicable to minimise the risks?
- Is the hardware (bins, receptacles, compactors etc) suitably situated and sufficiently maintained to minimise risks?

- Do staff and members of the public follow the instructions set out, if not, why not? This could indicate that you need to make changes?
- Are your systems adequate to control the risk? Do they need revising?
- Few workplaces remain the same so are your procedures frequent enough? Do you need to do certain tasks more (or less) often?

3.3 This guidance gives examples that will help you to comply with the law, and may be used to assist with the risk assessment process. It is not, however, a substitute for a suitable and sufficient site- or task-specific risk assessment in itself.

3.4 For further information and guidance on risk assessments visit www.hse.gov.uk/risk/.

4. Public safety

4.1 Although this section is focused on the public, the same risks apply to workers. The most significant risks to the public who attend bring sites will involve:

- Transport movements
- Slips, trips and falls
- Manual handling of materials

4.2 Transport movements

4.2.1 Vehicle movements regularly cause deaths and some of the most serious accidents within the waste and recycling industry. At bring-sites, because moving vehicles can operate in close proximity to pedestrians, there is the very real potential for collisions.

4.2.2 Vehicles driven by the public, as well as vehicles servicing the site, create hazards that should be properly managed.

4.2.3 The Workplace (Health, Safety and Welfare) Regulations 1992 require that every workplace is organised so pedestrians and vehicles can circulate in a safe manner.

4.2.4 Operators of waste handling facilities should use this guidance in conjunction with the information available in HSE and other publications (see further reading section at the end of this document).

4.3 Safe site

4.3.1 Clear roles and responsibilities should be assigned to those having control of the bring-site and to those operating the recycling vehicles and recycling receptacles.

4.4 Site layout

- **Can bring-site owners achieve a clear directional flow of traffic around the site?** One-way systems are best; they can minimise the amount of hazardous vehicle reversing
- **Are contents of each receptacle clearly marked and visible?** This will minimise the possibility of vehicle drivers making late adjustments to driving speed and direction. It may also minimise the amount of reversing required when drivers overshoot the receptacle they need
- **Can skips and other receptacles be positioned to eliminate blind corners?** If not, consider providing mirrors to improve any visiting driver's view of obscured areas.

4.5 Segregate cars, servicing vehicles and pedestrians

4.5.1 Can all vehicle movements (involving private cars as well as collection/servicing vehicles) and pedestrian activities be segregated? You could achieve this by:

- Scheduling receptacle exchange movements and servicing operations (cleaning etc) during a quieter time of day (eg early morning or at the end of the working day)
- Situating bring-sites away from areas where heavy pedestrian and vehicle traffic is expected (eg away from shops or facilities pedestrians or vehicles wish to access)
- Restricting access to areas where collection vehicles are operating. Have enough space around receptacles for safe vehicle manoeuvring/receptacle lifting. Where possible, owners should segregate areas (eg coning-off) around bins (the site is effectively closed) before servicing or exchange. This should prevent people parking cars impeding service vehicle
- Providing drop-off zones (eg marked by bollards, kerbs, painted lines), next to receptacles

4.5.2 Further controls may be necessary to ensure that pedestrians and public vehicles are effectively segregated from service vehicle movements. Suitably trained staff from the bring-site or from the pick-up company could be used to help ensure segregation.

4.6 Slow vehicle speed

- Is it possible for site owners to slow vehicle speed in the vicinity of the bring-site?
- Can prominent speed limit signs be placed at the bring-site entrance?
- Where they would not cause extra risk, is it possible to use high-visibility speed retarders?

4.7 Improve vision

- Can the bring-site be lit during twilight or when it's dark? This may also deter arson and vandalism etc, and dissuade members of the public from trying to enter bins.
- Avoid blind corners. Where blind corners cannot be avoided, can mirrors be provided?
- All staff should wear high-visibility clothing when near to vehicle movements
- Avoid obstructions around receptacles
- When cones, bollards etc are used to segregate pedestrians and vehicles, they should be highly visible (eg with high-visibility paint, reflectors etc)

4.8 Minimise and control reversing operations

4.8.1 Around a quarter of all deaths involving vehicles at work occur as a result of reversing. It also results in considerable damage to vehicles, equipment and property. Therefore, aim to:

- Eliminate or reduce the need to reverse
- Reduce the time spent during reversing by:
 - Minimising the distances vehicles have to reverse
 - Minimising the number of reversing operations that need to be done
- Minimise the potential for collisions by excluding pedestrians and obstacles from the immediate area during reversing

Table 1: Minimising/controlling reversing operations

Aim	Considerations
Eliminate or reduce the need to reverse	<ul style="list-style-type: none"> ■ One-way systems ■ Receptacle location ■ Provision of turning circle
Minimise the potential for collisions by keeping the area clear	<ul style="list-style-type: none"> ■ Receptacle location to permit clear lines of sight for drivers ■ Good housekeeping to remove transient obstructions ■ Control of public car parking in the area around the receptacle
Excluding pedestrians from the area during reversing operations	<ul style="list-style-type: none"> ■ Providing dedicated pedestrian walkways to segregate pedestrians from traffic ■ Selecting quiet times of day to operate ■ Providing a reversing assistance (see below)

Waste Industry Safety and Health Forum

- 4.8.2 Your risk assessment may show that relying purely on these risk reduction strategies cannot completely prevent the unexpected appearance of pedestrians. There may be areas where the public cannot be excluded effectively during servicing vehicle operations, and may be expected to be present.
- 4.8.3 Your risk assessment may also show that using reversing aids (mirrors, beacons, reversing alarms, CCTV etc) alone is insufficient to adequately control the risks during reversing.
- 4.8.4 The actions of members of the public can be unpredictable, and they are often not aware of the dangers of being in proximity to moving working vehicles. In these cases, a trained reversing assistant or a trained banksman (signaller) can reduce the risks when used in combination with other reversing aids.
- 4.8.5 **A reversing assistant** is defined as a trained employee who plays an active part in reversing manoeuvres by giving pre-arranged hand signals to drivers. Their role is to stop collisions by preventing the vehicle colliding with people and other road users.
- 4.8.6 **A trained banksman (signaller)** can be used both to keep the reversing area free from pedestrians and to guide drivers, particularly where lifting operations are also involved. More information on the use of a banksman/signaller can be found on HSE's website at: www.hse.gov.uk/workplacetransport/information/reversing.htm.
- 4.8.7 It may be reasonably practicable to use a trained reversing assistant or a banksman/signaller if the vehicle is double-crewed, or if the pick-up site is staffed (eg at a supermarket). Your own risk assessment may conclude that, wherever the public are likely to be in the vicinity during vehicle operations, you may always need to use either a reversing assistant or a banksman/signaller, whichever is the more appropriate to the site circumstances (as long as it is reasonably practicable and safe to do so).

4.9 Safe vehicles

- 4.9.1 Vehicles operating in public areas with a potentially high pedestrian density (car parks, city centre sites etc) should give the driver effective vision to the sides, rear and front of the vehicle. A high standard of reversing aids should be fitted to help the driver minimise risks to the public. Reversing aids may include CCTV, parabolic mirrors, reversing alarms, reversing sensors, beacons, or a mixture of these. Your risk assessment will help you decide which ones to use.

4.10 Slips, trips and falls

4.10.1 Slips and trips are the most common source of injury at work and members of the public will be equally at risk at bring sites where floors become wet or contaminated and where there is poor housekeeping.

4.10.2 Those in control of bring-sites may be able to reduce the risks of slips, trips and falls by adopting some of the features set out in Table 2 where appropriate.

Table 2: Reducing the risks of slips, trips and falls

Potential hazard	Potential controls
Slips and trips caused by poor ground condition	<ul style="list-style-type: none"> ■ Ground should be firm and without steep slopes ■ Avoid uneven surfaces and sudden changes in level ■ Surfaces should be maintained in good condition and free from potholes, broken paving slabs etc ■ Gullies should be covered to prevent them becoming blocked by waste and presenting a tripping hazard
Slips and trips caused by weather conditions	<ul style="list-style-type: none"> ■ The area should be well drained to reduce slipping risk caused by standing rainwater ■ In ice and snow are present, grit or salt etc may need to be applied
Slips and trips caused by excess waste, spillages and temporary obstructions	<ul style="list-style-type: none"> ■ Procedures should be in place to regularly clear away accumulated waste and spillages in the vicinity of the receptacles ■ The fill level of receptacles should be regularly monitored to arrange replacements, preventing overfilling, spillages and items being left in access walkways ■ The area should be regularly monitored to clear away temporary obstructions as soon as reasonably practicable ■ Unspecified waste (furniture, electrical items etc) deposited at the bring-site could cause tripping hazards. These items should be cleared away regularly, or if possible, separate receptacles should be provided
Slips and trips caused by poor illumination	<ul style="list-style-type: none"> ■ If possible, restrict operation to daylight hours ■ Adequate illumination may be needed during twilight or if the site operates when it is dark

Table 2: Reducing the risks of slips, trips and falls (continued)

Potential hazard	Potential controls
<p>Slips, trips and falls caused by access structures (if steps/ramps and gantries are provided)</p>	<p>Providing access arrangements such as steps, ramps and gantries to fill receptacles at bring-sites is comparatively rare. If your site does have them, then consider providing:</p> <p>At steps:</p> <ul style="list-style-type: none"> ■ Handrails and toe-boards ■ Broad treads with slip-resistant surfaces ■ Even spaced risers between treads ■ High-visibility (eg yellow-contrast painted) tread nosings, rounded to prevent feet catching ■ Signage – warn of steps, and inform users to use the handrail <p>At ramps:</p> <ul style="list-style-type: none"> ■ Handrails and toe-boards ■ Gentle gradients (avoid excessive ones) ■ Slip-resistant materials or coatings ■ Providing a ‘dogleg’ bend in the ramp to minimise the risks of ‘runaway’ barrows, or dropped items <p>At gantries:</p> <ul style="list-style-type: none"> ■ Guard rails and toe-boards to prevent falls from the gantry or into the skip/receptacle when loading ■ Slip-resistant materials or coatings

4.10.3 Effective housekeeping can reduce risks:

- A clean site, free from liquid spillages, dropped items, broken glass etc around the receptacles will minimise the slips and trips risk. Appropriate personal protective equipment (eg cut-resistant gloves) should be provided and used
- Materials for removing snow and ice should be available and used when required
- Housekeeping activities should not be carried out while vehicles are manoeuvring or receptacles are being lifted or lowered in the vicinity

4.10.4 You can find more guidance on slips, trips and falls at www.hse.gov.uk/slips/.

4.11 Manual handling

4.11.1 The risk assessment process will help identify the risks associated with manual handling to the public:

- Whether the need for manual handling can be avoided
- The level of risk of injury from any manual handling operation that cannot be avoided
- Measures to reduce the risk of injury from manual handling

4.11.2 Adopting some of the following suggestions may minimise the risks associated with manual handling to the public. The checklist is not comprehensive and your risk assessment may reveal other hazards and help identify other methods of effectively reducing the risks presented by those hazards.

Table 3: Minimising risks in lifting operations

Potential hazard	Potential controls
Carrying loads over unnecessary distances	Try to get the load and the receptacle as close to each other as possible, eg by locating car parking drop-off points as close as is practicable to the receptacles
Unnecessary reaching and stooping	<ul style="list-style-type: none"> ■ When selecting receptacles feed apertures ensure, so far as is reasonably practicable: ■ They are ideally between knuckle and elbow height (if that is not possible then they should be between knuckle and shin height, or between elbow and shoulder height) ■ They are not at or near ground level, and above shoulder height ■ Areas around feed apertures are kept clear of obstructions, so that people can get close to the feed aperture and do not have to over-reach
Steep ramps and steps	<ul style="list-style-type: none"> ■ Are steep ramps and steps really necessary? ■ Could more appropriate receptacles be chosen?
Lack of information to the public	<p>Advise the public, by signs or other means, that to reduce the handling risks to themselves, they can:</p> <ul style="list-style-type: none"> ■ Break the load down to be lighter and less bulky ■ Use bags or other containers to make the load easier to grasp ■ Use both hands when carrying ■ Avoid stooping and reaching where possible

4.11.3 You can find guidance on manual handling on the HSE website at www.hse.gov.uk/msd.

5 Safe Worker

5.1 Safe equipment

- 5.1.1 The contract between the bring-site owner and the recycling company should stipulate who is responsible for the safety and integrity of any receptacles.
- 5.1.2 Equipment should be maintained in a safe condition and may need to be regularly inspected by a competent person. They have been known to fail because progressive wear or deterioration in their condition has not been noticed.
- 5.1.3 The chains, wire ropes, lifting rods etc attached to containers such as bottle banks are considered to be part of the load and, as such, their inspection is not a direct requirement under the Lifting Operations and Lifting Equipment Regulations (LOLER).
- 5.1.4 However, an inspection under the Provision and Use of Work Equipment Regulations (PUWER) is a requirement because if chains/ropes/rods were to fail the contents of the bottle bank would be dropped, putting anyone in the vicinity at risk. The scope of the PUWER inspection would be similar or identical to that of an examination under LOLER; the significant difference is that under PUWER there is no requirement for a written report of inspection.

5.2 Mechanical lifting operations

- 5.2.1 Table 4 summarises some actions you can take to minimise the risks from the lifting and emptying of recycling receptacles.

Table 4: Example ways to minimise risks from lifting and emptying receptacles

Potential hazard	Potential controls
Receptacle or load-bearing points could fail due to wear and tear, corrosion or overloading	Inspection to check the integrity of the: <ul style="list-style-type: none"> ■ Recycling receptacles ■ Lifting equipment ■ Lifting points
Destruction or catastrophic failure of lifting equipment or unexpected movement of the receptacle when released	The receptacle should be able to move freely as intended – ensure there is no snagging of chains etc

Waste Industry Safety and Health Forum

Collision risks to pedestrians during pick-up/exchange operations	Ensure pedestrians are excluded from areas where these operations are taking place
Risks of receptacle over-run outside the designated area	Some premises have made this task easier by providing raised floor guides and 'wheel stops' to ease skip location and prevent over-run (ie the receptacle skidding when placed, and moving outside the intended area)
Collisions between vehicles/parked cars/plant/pedestrians	<p>A receptacle's location is important for safe and efficient operation of the site. Interfering with smooth and planned traffic flow on site dramatically increases the risk of collisions. Creating a blind corner or obstructing pedestrian walkways can increase collision risks. Check the location and the surrounding area. When assessing the receptacle's location, ask yourself:</p> <ul style="list-style-type: none"> ■ Does it conform to your requests as to where it should be placed? ■ Does it impede or interfere with traffic movement and/or parking arrangements? ■ Does it create a blind corner?
Contact with overhead obstructions or overhead power lines	<p>Overhead obstructions can impede the lifting operation, pose direct risks or impair the driver's view of the lifting operation:</p> <ul style="list-style-type: none"> ■ The receptacle should be sited to avoid street lighting, bunting, overhead cables etc ■ Overhanging vegetation should be pruned to prevent obstruction or snagging ■ If lifts must take place under any overhead power lines and pipework then special precautions will be required. Seek competent advice

5.2.2 Your risk assessment should indicate the security measures you may need to have in place to prevent public access to the insides of certain receptacles.

5.3 Falls from height

5.3.1 Sheeting high-sided skips and commercial vehicles by climbing onto the vehicle without adequate means to prevent a fall is a high-risk activity with a significant risk of serious injury. Site and vehicle operators should both ensure that only safe systems of work are used.

- 5.3.2 You can prevent falls during sheeting vehicles by providing automated sheeting systems (auto-sheeters). These remove the need to work on top of the load. These systems are suitable for all sites and remove the need for each site to provide safe access.
- 5.3.3 Alternatively, you could provide a sheeting station that allows access to the load via a gantry and a safety harness for the operator to prevent falls from unguarded sides of the load.

5.4 Personal protective equipment

- 5.4.1 Drivers and any support staff involved in manoeuvring, receptacle lifting or emptying tasks should wear high-visibility clothing.

5.5 Training, instruction and supervision

- 5.5.1 Sufficient training, instruction and supervision for all workers involved with the recycling operation should be provided specific to the task they are performing. Where site-specific rules exist, staff must understand these and carry them out. There is more advice in HSE leaflet *Health and safety training: A brief guide*.

5.6 Monitoring

- 5.6.1 You may need to monitor work activities periodically to assure yourself that your system of work is both suitable, and that your staff keep to it.

6 Worker consultation and engagement

- 6.1 Workers should be consulted and engaged regarding the health and safety arrangements and working practices. Their support is essential in ensuring safe working. Safety representatives and other workers can contribute positively in achieving the desired outcomes by:
 - Identifying problems
 - Indicating whether activities can be carried out safely under prevailing conditions
 - Generating sound practical ideas and solutions
- 6.2 Further information on worker involvement can be found at www.hse.gov.uk/involvement/ and in HSE leaflet: Consulting employees on health and safety: A brief guide to the law.

7 Further reading

WISHWASTE 26 – Managing health and safety in civic amenity sites.

HSE's 'Managing for health and safety' website: www.hse.gov.uk/managing/

Workplace health, safety and welfare. Workplace (Health, Safety and Welfare) Regulations 1992. Approved Code of Practice L24 HSE Books 1992 ISBN 978 0 7176 0413 5
www.hse.gov.uk/pubns/books/l24.htm

Workplace transport safety: An employers' guide HSG136 (Second edition) HSE Books 2005 ISBN 978 0 7176 6154 1 www.hse.gov.uk/pubns/books/hsg136.htm

Safe use of lifting equipment. Lifting Operations and Lifting Equipment Regulations 1998. Approved Code of Practice and guidance L113
HSE Books 1998 ISBN 978 0 7176 1628 2 www.hse.gov.uk/pubns/books/l113.htm

Safe use of work equipment. Provision and Use of Work Equipment Regulations 1998. Approved Code of Practice and guidance L22 (Third edition)
HSE Books 2008 ISBN 978 0 7176 6295 1 www.hse.gov.uk/pubns/books/l22.htm

Health and safety training: A brief guide Leaflet INDG345(rev1)
HSE Books 2012 www.hse.gov.uk/pubns/indg345.htm

Consulting employees on health and safety: A brief guide to the law
INDG232(rev2) HSE Books 2013 www.hse.gov.uk/pubns/indg232.htm

Risk assessments: www.hse.gov.uk/risk/

Slips, trips and falls: www.hse.gov.uk/slips/

Manual handling: www.hse.gov.uk/msd/

Sheeting and unsheeting: www.hse.gov.uk/workplacetransport/information/sheeting.htm

Worker involvement: www.hse.gov.uk/involvement/

Disclaimer and WISH

Nothing in this guidance constitutes legal or other professional advice and no warranty is given nor liability accepted (to the fullest extent permitted under law) for any loss or damage suffered or incurred as a consequence of reliance on this guide. The guidance is not a substitute for duty holder judgment and/or professional safety advisor's judgment, Notwithstanding the good practice in this guidance, duty holders are responsible for ascertaining the sufficiency and adequacy of their internal and independent procedures for verifying and evaluating their organisation's compliance with health and safety law. WISH does not accept any liability (to the fullest extent permitted under law) for any act or omission of any persons using the guidance

The Waste Industry Safety and Health (WISH) Forum exists to communicate and consult with key stakeholders, including local and national government bodies, equipment manufacturers, trade associations, professional associations and trade unions. The aim of WISH is to identify, devise and promote activities that can improve industry health and safety performance.

Further information

This guidance is issued by the Waste Industry Health and Safety (WISH) Forum to help control the safety and health risks. Following the guidance is not compulsory, unless specifically stated, and you are free to take other action. But if you do follow the guidance you will normally be doing enough to comply with the law. Health and safety inspectors seek to secure compliance with the law and may refer to this guidance. Some parts of the guidance represent good practice and may go further than the minimum you need to do to comply with the law.

This guidance is available free to download at the WISH web site. This publication is based on guidance previously published by the Health and Safety Executive (HSE) known as Waste 11, which was withdrawn in 2015. © Crown copyright 2013.

WISH is re-using text provided by the HSE free of charge under the terms of the Open Government Licence v2.0. To view this licence visit <http://www.nationalarchives.gov.uk/doc/open-government-licence>, or write to the Information Policy Team, The National Archives, Kew, Richmond, Surrey, TW9 4DU; or email: psi@nationalarchives.gsi.gov.uk. Any enquiries regarding this document/publication should be directed to WISH or the HSE.

