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HEALTH AND SAFETY EXECUTIVE

Senior Management Team

Industrial lift truck training: Revised recognition criteria for Accrediting Bodies

A Paper by Peter Brown

Advisor: Carol Grainger and Oonagh Newcomen

Cleared by Jane Willis on 26 October 2009

Issue

1. This paper seeks clearance by the SMT of a proposal to pilot new criteria for recognition of Accrediting Bodies for industrial lift truck operator training.

Timing

2. For clearance on 4 November to enable an approved paper to go below the line to the Board on 25 November 2009.

Recommendation

3. That the SMT agrees the attached paper for submission to the HSE Board.

Background and Argument

4. See attached Board paper and annexes.

Consultation

5. Consultation has taken place with FOD Construction, Agriculture and Transportation Sectors, Policy Capability Team, STSU, Better Regulation Unit and PFPD. All comments have been taken on board.

Presentation

6. Internal – FOD, HID and all sectors and local authorities. External- all sectors and all users of mobile plant and plant training providers. Good communication routes to external stakeholders already exist via the Accrediting Bodies themselves, various trade associations and local authorities.

Costs and Benefits

7. The pilot will enable us to gather information on the costs and benefits of the new criteria. We will return to the SMT with a full assessment of these following the pilot.

Financial/Resource Implications for HSE

8. The best estimate of cost for HSE to review the monitoring exercise for 12 months would be £50,000. This includes HSL costs of £30k and the salaries for a maximum of 5 days per quarter of bands 3 and 4, and 2 days for Band 2 pr quarter. These costs are manageable within the current resource allocation. HSL have confirmed that they are happy and able to undertake this work.

Environmental implications

9. None

Action

10. SMT to clear the attached Board paper.

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INDUSTRIAL LIFT TRUCK TRAINING: REVISED RECOGNITION CRITERIA FOR ACCREDITING BODIES			

Purpose of the paper

1. To seek the Board's agreement to undertake a pilot scheme for the new criteria for recognition of Accrediting Bodies for industrial lift truck operator training.

Background

2. Since 1998, HSC has recognised certain bodies (listed at Annex 1) as being competent to accredit and monitor training organisations who train industrial lift truck instructors and /or train, test and certificate lift truck operators in accordance with the principles set out in the Approved Code of Practice Rider-Operated Lift Trucks: Operator Training (L117).

3. This system was originally developed to provide employers with some assurance that the training they are obtaining for their operators is of a satisfactory quality to help them meet their duties under Section 9 of PUWER 1998. Broadly these are, to ensure that all persons that use, supervise or manage the use of work equipment, - in this case lift trucks, - have received adequate training. This is particularly important to many small businesses that are generally without the necessary expertise to evaluate the quality for themselves.

4. A set of general criteria for recognition were developed (listed at Annex 2) when the scheme was set up. HSE has been concerned for some time that these criteria are not up to date and do not set out the requirements on Accrediting Bodies (ABs) clearly enough, nor do they provide sufficiently testing benchmarks to give HSE the confidence that bodies who are able to meet them are actually competent to do the work. The current ABs themselves are not clear about what is expected from them by HSE in terms of delivery standards, quality assurance, frequency of monitoring, information collection etc.

5. Although we believe the criteria now need review and revision, a study carried out for HSE by BOMEL in 2007 reported that though there were some inconsistencies in the operating standards employed by the existing bodies, all of them were fit for purpose. This provides some reassurance about the currently recognised ABs.

Argument

6. However, HSE believes that the existing criteria would not ensure that unsuitable bodies were denied recognition in the future; nor that falling standards in the existing ABs would be identified early and those bodies be given advice or held to account before harm were done –including reputational harm to HSE. In the light of this and

BOMELS's findings, the ABs have worked with HSE and HSL to develop a set of new more appropriate criteria. (listed at Annex 3).

7. The new draft criteria list the matters that ABs need to deal with and to what extent, define certain terminology and indicate minimum standards for monitoring and providing feedback to trainers. To make sure that the benefits of the existing scheme are maintained, and that the standards ABs are expected to meet and the consistency of training provision improved, the draft new criteria need to be tested in operation. The ABs and HSE have agreed to pilot the revised criteria for a year. HSL will monitor the process during this period. At the end of the pilot year, we will report back to the Board with the final criteria and options for the future of the scheme, including possible outsourcing of monitoring.

Costs and Benefits

8. This activity will involve introducing new auditable operating criteria. The main impact of the new criteria will be on the operation of the ABs, though there will be some additional requirements on the trainers. We expect the costs to the trainers to be minimal and therefore have little or no impact on the end user. However, the pilot period will give us the opportunity to assess this properly.

9. SMEs and other employers choose AB accredited training to help them meet their duties under Reg 9 PUWER. Improving the quality and consistency of the accreditation process will provide them with some reassurance about this choice, and provide HSE with reassurance that appropriate standards are maintained.

Financial/Resource Implications for HSE

10. The best estimate of cost for HSE to review the monitoring exercise for 12 months would be £50k. This includes funding HSL to provide quarterly reports to HSE at a cost of £30k and HSE salaries for a maximum of 5 days per quarter for Bands 3 and 4, and 2 days for a Band 2 per quarter. Actual resource requirements are expected to be less than this. These costs are manageable within our current resource allocation and costs for the next financial year have been included in the Divisional bid. HSL have confirmed they are willing and able to undertake this work.

Action

11. To note the paper and agree to the proposed pilot.

Paper clearance

Jane Willis has cleared this paper.

Contact

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Annex 1

CURRENT ACCREDITING BODIES

There are currently six lift truck Accrediting Bodies recognised by the Health and Safety Executive (HSE) Board:

- Road Transport Industry Training Board (RTITB), an independently funded limited company that accredits over 600 training providers;
- ConstructionSkills, the Sector Skills Council for Construction, funded predominantly by the construction industry (through a statutory levy) who accredit 161 test centres;
- Lantra the Sector Skills Council for the environmental and land-based industries, which is publicly funded and works with seventeen industries across the United Kingdom and has accredited over 900 instructors;
- National Plant Operators Registration Scheme (NPORS), which is privately funded (through registrations and applications), and has accredited over 1000 instructors and training providers;
- The Association of Industrial Truck Trainers (AITT), a self financing and non-profit making organisation which has accredited over 900 instructors;
- Independent Training Standards Scheme and Register (ITSSAR), a self-financing and non-profit making organisation that has accredited around 4000 instructors.

Annex 2

EXISTING CRITERIA FOR RECOGNITION BY HSC AS AN ACCREDITING BODY **Health and Safety Commission Paper (2005)**

a. General

To be recognised, an accrediting body should have:

- i A generally acknowledged standing and expertise in the development of lift truck operator and instructor training courses and in training issues likely to arise in respect of both operator and instructor training;
- ii Prepared and published standards for lift truck operator training which are accepted by major training bodies, employers, trade unions and other interested organisations within the sphere of the accrediting body; and
- iii The staff and resources to administer a large-scale accreditation scheme successfully.

b. Accrediting standards and practice

An accrediting body should:

- i Accredite only organisations, individuals or courses that ensure training at least to the standards laid down in the Health and Safety Commission's Approved Code of Practice and associated guidance;
- ii Monitor the performance of any organisation, individual or scheme that it accredits;
- iii Revoke accreditation in cases where standards fall below those prescribed;
- iv Not withhold accreditation unreasonably, give an unsuccessful applicant reasons for the rejection of the application and an opportunity to re-apply; and
- v Maintain strict separation and independence between its accrediting functions and its own training activities, if any.

c. Provision of information

An accrediting body should:

- i Make available to inquirers up-to-date lists of accredited organisations, individuals and courses and a description of its assessment criteria; and
- ii Keep the Health and Safety Executive informed of its accrediting activities, furnishing reports as necessary.

Annex 3

DRAFT CRITERIA TO BE PILOTED

Accrediting Bodies must ensure that:

1) Training Providers have these minimum requirements (e.g. of courses and facilities) -

Training Providers must have a defined programme for every course and associated course documentation (e.g. training syllabi and course materials), which is pre-approved or created by the Accrediting Body. Training syllabi must be comprehensive and include as a minimum; the aims and objectives of the course, a breakdown of the course, duration of course and notes for instructors.

The Training Providers must ensure sites have the relevant and necessary facilities and equipment available on site (i.e. plant machinery and equipment). Training Providers must adhere to Accrediting Body criteria (i.e. including the relevant and necessary legislation) in order to deliver the training (e.g. Health and Safety legislation – including accident reporting and emergency procedures and Equal Opportunities Legislation) they must also have the appropriate insurance and professional indemnity, and be registered with the Information Commissioner's Office either directly or indirectly via the relevant Accrediting Body.

Prior to certification, Training Providers must ensure that the knowledge, skills and abilities of the trainees have been objectively assessed and documented. As a guide Lift Truck courses for novice trainees are expected to last 5 days (i.e. a minimum of 36 hours, excluding breaks and lunches) and Training Providers will be expected to provide objective assessments and related documentation as evidence to support any instances where shorter Lift Truck courses have been delivered to novices.

Once a year a quality assurance committee, that includes representatives of the Accrediting Bodies, will ensure that the standards that Training Providers are assessed against are maintained. Meeting collectively and regularly (at least once a year), with a structured agenda, the Accrediting Body representatives will review and agree the minimum requirements for training.

2) Monitoring

Training providers are to be monitored annually. Monitoring visits must include assessment of the documentation (e.g. training syllabi, the training programme and course materials) and observation and assessment of course delivery. When a lone Accredited Training Instructor receives a monitoring visit, at least 20% of the time spent on site will be allocated to the observation of course delivery. When monitoring Training Providers, who employ In-House Training Instructors, a sample of the In-House Training Instructors will be selected for observation (e.g. at a site with 20 In-House Training Instructors delivering courses, it would be possible to select a sample of 10% i.e. two Instructors) and again 20% of the time spent on site will be allocated to the observation of course delivery. A days monitoring visit will take at least four hours to complete, this being the minimum set for monitoring small

Training Providers and Accredited Training Instructors, larger Training Providers will require additional monitoring time that reflects their size (i.e. the number of courses, trainees and In-House Training Instructors).

In addition Accrediting Body monitors will ensure the Training Providers have:

- Appropriate insurance;
- The necessary indemnity;
- Up to date records and evidence of the instructors' qualifications;
- Thorough procedures in place to assess of the instructors' competence;
- Thorough quality assurance procedures;
- Registration for data protection;
- Adherence to the appropriate legislation and regulation (e.g. Health and Safety legislation - emergency procedures);
- An acceptable standard of the equipment (i.e. plant machinery and equipment) and facilities.

An Accrediting Bodies quality assurance committee will meet at least once a year to review and agree the criteria and practices that are monitored, and the process that their monitors employ to make their assessments.

3) Registered certification

Each Accrediting Body is to have in place their own certification registration system; the related database must include details of the date of the course, name of the Instructor, location of the course, Training Provider, unique certificate ID number, qualification awarded and the full name of the successful trainee.

All related certification will include the full name of the successful trainee, the Accrediting Body, the dates of the course attended, a unique certificate ID number and details of the training (e.g. the type of machinery/equipment the individual is qualified to use).

If the certificate has been produced by the Training Provider then the details of the Training Provider must also be on all related certification.

4) Communication

Training Providers and instructors must receive detailed and time scaled action plans when required from their Accrediting Body following a monitoring visit. The Training Provider and instructors will receive, where possible, verbal feedback on the day of the visit and written feedback will be received by the Training Provider no later than ten working days after the monitoring visit.

Service level agreements between Accrediting Bodies and Training Providers/Accredited Training Instructors must be in place to ensure that Accrediting Bodies respond to Training Providers/Accredited Training Instructors queries within five working days.

Accrediting Bodies are responsible for ensuring that Training Providers are clear on the criteria that they must comply with to ensure accreditation status is achieved/maintained. Accrediting Bodies must be readily accessible to Training Providers and provide regular and relevant information (e.g. quarterly newsletters, helpdesk staffed during office hours, informative website, and generic email accounts that are publicised and continually monitored).

5) Sanctions

Accrediting Bodies are to have in place contractual agreements with the Training Providers. Contravention of the contractual requirements set by the Accrediting Bodies; fraudulent activity, working outside of the accreditation system, inappropriate behaviour and falling below the minimum standards, will incur sanctions.

The NVQ code of practice (i.e. QCA 2006) will form the model upon which the sanctions will be applied by the Accrediting Bodies i.e. the starting point (level 1) being that the Accrediting Body impose an action plan on the Training Provider. The action plan between the Accrediting Body and Training Provider will detail the differences and reparations regarding what will be done and when.

Accrediting Bodies must clearly inform Training Providers that their accreditation status has been revoked. Accrediting Bodies will ensure that they maintain regular contact with each other through the Health and Safety Executive (HSE), as this will reduce fraudulent activity (e.g. one Training Provider having their application for accreditation rejected or revoked by one Accrediting Body and then moving on to another Accrediting Body to make a new application for accreditation).

An Accrediting Bodies quality assurance committee will meet at least once a year to agree the sanctions to be applied for contravention of the contractual requirements and the system to be adopted for imposing sanctions.

6) Accrediting Body Status

Accrediting Bodies must provide evidence that they are continuously maintaining their eligibility to be an Accrediting Body:

- All Accrediting Body monitors (i.e. those who undertake site audits of courses and evaluate new instructor applications) require a sufficient level of technical knowledge, training in auditing techniques and have a recognised professional instructor qualification.
- Accrediting Bodies must have corporate governance i.e. documented business plans, policies and appeals procedures, that gives Training Provider management the control to effectively manage the provision of training on the use of plant machinery and equipment.
- Accrediting Bodies are to provide HSE with details of their activity i.e. evaluated in the form of yearly audits of documentation and evaluation against quality systems.

7) Accreditation logo

All Accrediting Bodies will use a national common logo, and HSE will revoke the use of this logo if any Accrediting Body falls below the minimum standards required for Accrediting Body status.

Glossary

Accrediting Body – An organisation that accredits, for example, Training Providers, Accredited Training Instructors, training courses and training centre premises.

Training Provider – Organisation delivering training on the use of plant machinery and equipment.

Accredited Training Instructor – The Accrediting Body has inspected and continually monitors the performance of the Accredited Instructor i.e. an individual delivering the training.

In-House Training Instructor - An Instructor that only delivers training for the Training Provider that they are employed by.

Novice – Someone who has had limited/no prior experience on the use of plant machinery or equipment.