

Agriculture Sector Work Plan 2019-20: Inspection of farms with beef and dairy cattle, Inspection in conjunction with Agriculture Compliance Events. Follow-up evaluation inspection of 2018/2018 ACE premises

Open Government status: Open

Audience: FOD Inspectors, Visiting Officers, Divisional Intelligence Officers, Specialist Inspectors

Explanatory note: Please refer to the overarching Targeting and Intelligence guide for information on targeting and extra information on how to record. This document now incorporates the extra details relating to the ACEs.

Contents

1. Inspection programme

- 1.1. [What are we inspecting and why?](#)
- 1.2. [What is the extent of the problem?](#)
- 1.3. [What must be covered at the inspections?](#)
- 1.4. [What sectors and topics are we inspecting and when?](#)
- 1.5. [Application of the Enforcement Management Model \(EMM\)](#)

2. [Support and guidance available](#)

3. [Recording the inspections](#)

4. [Your health and safety](#)

5. Appendices

- 5.1. [Managing the risks from cattle](#)
 - 5.1.1 Summary of relevant guidance.
 - 5.1.2 IEE for managing the risks from cattle
- 5.2. [Inspection in support of Agriculture Compliance Events \(ACE\)](#)
 - 5.2.1 IEE for inspections following Agriculture Compliance Events
- 5.3. [Follow up evaluation inspections of 2018/2019 ACE premises](#)
 - 5.3.1 IEE for follow up evaluation inspections to 2018/2019 ACE premises
- 5.4. [General references for inspecting in the agriculture sector](#)

Inspection programme

1.1. What are we inspecting and why?

Agriculture is an industry in which risks are poorly managed, resulting in persistently high rates of injury and ill-health.

The purpose of this inspection programme is three-fold:

- 1) To target the major risks in the livestock sector that often lead to fatalities and serious injury, including to members of the public who may encounter cattle in fields while using public footpaths: and
- 2) An inspection programme designed to combine with a series of compliance events (Agriculture Compliance Events -ACEs), developed as a result of research into farmers attitudes to risk with the aim to bring about a change in behaviours and improvements in the management of risk;
- 3) Follow up evaluation inspections to a small number of farms visited as part of the ACE inspections in 2018/2019.

The first deals with the management of risk arising from farming beef and dairy cattle, which is consistently one of the most common causes of fatal incidents and serious injury (it mirrors activity the Farm Safety Partnership is taking).

The second is year 2 of what is anticipated to be a long-term intervention aimed at delivering behaviour change and sustained improvements in risk management.

The third is to evaluate if the ACE approach is showing any results that might indicate sustained compliance.

1.2. What is the extent of the problem?

Agriculture represents 1.2% of the GB workforce but accounts for 20% of reported work-related fatalities each year and is a priority in the HSE work plan. Agriculture's injury rate is six times that of construction and 18 times greater than the all industry average. The causes of death have remained largely unchanged for many years e.g. workplace transport; struck by falling objects; falls from height; machinery and livestock handling, yet the precautions necessary are well known and guidance widely available. The latest fatal injuries report for agriculture can be found at [Fatal injuries in agriculture, forestry and fishing in Great Britain 2017/2018](#)

In addition, the industry has a very poor record for non-fatal injury and occupational health performance. The true extent is hard to gauge but best indicators of occupational ill-health performance are extrapolated from the Labour Force and self-reported work-related illness surveys. These suggest that 1.3 million people are suffering from some form of occupational disease because of working in agriculture.

0.5 million of these are musculoskeletal disorders (MSD's) while occupational lung disease (OLD) is the second most common form of occupational ill-health, followed by cancers and skin disease. There are estimated to be 15,000 cases of occupational ill-health reported to be caused or made worse by work and 13,000 non-fatal injuries in agriculture each year.

1.3. What must be covered at the inspections?

Appendices to this OG describe the specific issues to be addressed during inspection.

Briefings will be provided for those FOD units involved in the follow up inspections following farms attending Agriculture Compliance Events.

Matters of evident concern (MEC) and any matters of potential major concern (MPMC) should be dealt with in accordance with current guidance.

1.4. What sectors and topics are we inspecting and when?

Sector	Topics	When
Managing the risks from cattle	• Handling and housing cattle • Risks to members of the public • Bale handling and stacking • Slurry • Children on farms	Q1 See Appendix 5.1
Inspection following Agriculture Compliance Events (ACE)	Topics will match the areas covered by the ACE • Work at height and falling objects • Workplace transport and machinery • Cattle handling • Electricity • Children on farms • Drowning and asphyxiation	Q3 See Appendix 5.2
Follow-up evaluation inspection of Agriculture Compliance Events (ACE) 2018/2019 premises	Topics will match the areas covered by the ACE • Work at height and falling objects • Workplace transport and machinery • Cattle handling	Q4 See Appendix 5.3

	• Electricity • Children on farms • Drowning and asphyxiation	
--	---	--

Further information on targeting of premises including SIC codes is contained in the Targeting & Intelligence Guide

1.5. Application of the Enforcement Management Model (EMM)

Specific guidance is provided on application of the Enforcement Management Model and provision of IEEs for each of the above workstreams.

2. Support & Guidance Available

Specialist Support type	Relevant specialist
Industry standards & enforcement	Agriculture Sector:
	Luke Messenger x1739 - agricultural machinery
	Wayne Owen x1320 - falls, MSD, livestock
	Paul Cooper x 1749 - child safety, pesticides, OLD

Sector specific appendices provide links to specific guidance. Appendix 4 provides links to general agricultural guidance.

Important Other Guidance for Inspections	Guidance location
Workplace guidance inspection pack	WPT
Falls from height inspection pack	Falls

The above support and guidance will be supplemented by in-year work briefings relating to ACEs.

3. Recording of inspections

Inspections should be recorded in accordance with current work recording instructions (COIN/DO-IT).

Sector	DO IT risk area
--------	-----------------

Managing the risks from cattle	Livestock handling; Confined Spaces; Substances Hazardous to Health; Work at Height; MSD; Public Protection <i>Inspection type 'HRS'</i>
Inspection following agriculture compliance events	Plant & Equipment; Workplace Transport; Work at Height - <i>Inspection type 'AGCOMP'</i>
Follow up evaluation inspections to 2018/2019 ACE premises	Plant & Equipment; Workplace Transport; Work at Height - <i>Inspection type 'AGCOMP'</i>

Inspectors are encouraged to share with the Agriculture Sector any issues of note (e.g. good practice, extremely poor practice, photographs, copies of letter/notices etc.).

Answers to the following questions will assist in consistent and accurate recording and in analysis of the visit programme. **Please answer the following:**

- 1) Activity inspected?
- 2) Are control measures used, checked and maintained?
- 3) What are the specific control failings?
- 4) What are the management failings (training, instruction, information, etc.)?
- 5) What material breach or enforcement action has been taken?

The following structure should be used (including the question number) **at every visit** made in support of this programme:

Q1: Answer
Q2: Answer
Q3: Answer
Q4: Answer
Q5: Answer

4. Health and Safety

Industry-specific health & safety information is detailed in the sector sub-appendices.

General health & safety information for visiting staff can be found on the intranet Health and Safety for Visiting Staff.

5. Appendix 5.1: Managing the risks from cattle

Introduction

Managing the risks from cattle

Look at how farms manage the risks to themselves, their workers, contractors and members of the public from cattle.

Focus on:

- Handling and housing cattle
- Risks to members of the public in fields with public rights of way

FOD Visits will be coupled to significant industry activity in Q1 relating to livestock safety and supported by related comms activity.

Additional related topics

In addition, examine the following topics where they are present on site:

- Bale handling and stacking
- Slurry
- Children on farms

NOTE – Please record on HSE IT systems (COIN / DO-IT) that each of the five topics has been discussed during each visit.

MECs and MPMCs

Any [Matters of Evident Concern](#) and [Matters of Potential Major Concern](#) should be addressed in the usual way.

Reason for the inspections

In the last 5 years a total of 158 people have been killed in agriculture. Many thousands more have been seriously injured or made ill.

Being injured by cattle is one of the leading causes of fatal and major injury on farms. In the last 5 years 29 people have been killed by livestock.

In addition, there are significant numbers of fatalities arising from hazards that are common on livestock farms namely working at height, falling objects, bales and slurry.

Falls from height and falling objects have accounted for 39 deaths in the last 5 years - Incidents involving bales account for a large portion of these deaths.

10 people in the last 5 years have drowned or been asphyxiated in ponds, slurry lagoons / pits, grain bins or silos and other confined spaces.

Child safety continues to be an important topic to address on all farms - 5 children have been killed on farms in the last 5 years.

Targeting

Cattle visits will mainly take place in the following regions of Great Britain:

Region
Scotland
North West
Yorks & NE
East Midlands
West Midlands
Wales
South West

Visits should be made according to the instructions in the FOD Targeting and Inspection Guide 2019/20. Premises to visit will be provided to FOD by the Agriculture Sector.

Timing

Visits should be completed by the end of Q1 (end of June 2019) of the work year.

Health and safety

Inspectors should follow 'HSE guidance for inspectors when visiting farms' and [HSE guidance on biosecurity practices when visiting farms](#) at all visits.

Inspection**Roles and responsibilities of HSE****Agriculture Sector -**

- Provide list of viable visits to DST.

DST -

- Distribute lists of suitable farms to be visited to FOD Geographical Divisions.
- DST will work with the DIO network to ensure sufficient visits within each FOD Geographical Division.

FOD Geographical Divisions should

- Send visit numbers and visit lists to its FOD Groups.
- Ensure visits are carried out addressing the five topics.

FOD Divisional Intelligence Officers

- Assist where required in the communication of the visit lists and OG to the Principal Inspectors of FOD Groups in each FOD Geographical Division.

FOD admin / inspectors

- Consider advance contact with farms to arrange a visit date and time. This will reduce the chance of arriving to find the farmer is off site.

FOD Office Admin should

- Liaise with the Inspector to prepare targeting and intelligence packs for the visit. This should be done in a structured way as set out below.
- Refer to the visit lists and phone the farm to arrange a visit. If contact is made with the farm, check they have cattle and the key person is available.
- Farmers are often away from the phone and may not answer the phone at the first attempt. This does not mean that the farm is no longer active. Try contacting the next farm on the list and so on until you have enough visits. Sites you can't contact should be left on the list and contacted again if more visits are needed.
- It may be useful for your own purposes for Admin to note how many attempts at contact have been made for each farm.
- After several unsuccessful attempts to contact the farm consider sending a letter Agree the text with an inspector. Suggested text is given in Annex 3 of the T&I guide distributed by DST.
- Clearly use of a letter has its limitations. Every effort should be made to contact the farm by telephone in the first instance. If an email address is available, then this could also be used to contact the farm
- When setting up the COIN inspection case put “#cattle” in the Case Summary Field (this is important to enable the Sector to evaluate the work). Visits without the phrase ‘#cattle’ may not be counted by DST or Sector. Please record inspection case as **Inspection Type HRS**.
- Keep records and lists up to date to assist with organisation of the visits.

Inspectors

- Carry out inspections and record in line with the guidance in this OG and the FOD

Targeting and Inspection Guide 2019/20.

- Check that “**#cattle**” has been put in the Summary box in the COIN case. Cases that do not have this hashtag may not be counted against the planned number of inspections.
- At each visit, Inspectors should consider the 5 issues set out below in the Priorities section.
- **Enforcement action** should be considered if there is non-compliance in relation to a material risk. Initial Enforcement Expectations for commonly encountered issues are set out in Appendix 2.
- When recording the outcome of the inspection ensure that the questions posed in the OG are clearly answered.

Recording inspections

- Visits should be recorded in accordance with current work recording instructions and the instructions in this OG.

Priorities

Cattle - Handling system overview

A farm should have a good handling system in place to control risks to people from cattle. A good handling system should keep the farmer out of danger when working with cattle. This is the principle that you should keep in mind when inspecting.

A handling system will probably be made up several elements including a collecting pen, a race, a crush, shedding gates, loading facilities, and bull handling equipment. Contact the Agriculture Sector if you need advice on these elements.

Concentrate on arrangements for

- Handling and housing cattle – see attached guidance. Use of good handling facilities that are well maintained will reduce the risk of injury to those working with animals. Check that worker/farmer training, supervision and agility are all appropriate for the tasks being done. Mobile handling facilities reduce the risk of injury when working with animals in the field.
- Risks to members of the public in fields with public rights of way – Check arrangements have been made to keep cattle and calves out of fields with PROW or public access

In addition, examine the following topics where they are present on site:

- Bale handling and stacking
- Slurry
- Children on farms

Further guidance on the topics you are likely to encounter are attached in Appendix 5.1.1 and in the linked Guidance.

Possible MECs and MPMCs on a farm

Workplace transport e.g. ATVs	Asbestos
Machinery guarding e.g. PTOs	Flammable / explosive substances e.g. dust
Work at height e.g. roofs / fragile roof warning signs	Confined spaces
Falling objects	Pressure vessels e.g. LPG
Manual handling	Zoonoses
Electricity / overhead power lines	Dermatitis
Chainsaws	HAV
Chemicals and hazardous substances	Legionella
Slips and trips	Structural safety
Noise	Pesticides – approach an NPET (pesticides trained) inspector with any

	MECs identified
Guidance	
Cattle • HSE website - livestock pages • Handling and housing cattle - AIS35 • Cattle and public access in England and Wales - AIS17EW • Cattle and public access in Scotland - AIS17S Bales • Safe working with bales in agriculture - INDG125 Slurry • Managing slurry on farms - AIS9 • Managing confined spaces on farms - AIS26 Children • Preventing accidents to children on farms - INDG472 • HSE webpage - Children and public safety on farms General • Farmwise - HSG270 • What a good farm looks like	
Contacts	
Agriculture Sector – Health, Engagement, Livestock & Pesticides Team • Adrian Hodkinson – Head of Sector Team - 020 30 28 2683 • Wayne Owen - Sector lead on cattle, bales, slurry & child safety – 07771 667015	

Appendix 5.1.1– Summary of relevant guidance

Cattle – General considerations

- The farm should assess the risks when handling cattle, have standard procedures for routine tasks and have the appropriate equipment in place.
- Training and competence - Those handling cattle should understand and adopt safe practice, be able to use the handling equipment, be aware of the dangers, and understand cattle behaviour. They should be assessed on their competency. Where there are any doubts about competence, training courses on livestock handling are available or they should be fully and properly supervised
- Staff should understand the farm's standard procedures for specific tasks with cattle. Systems of work that keep cattle and people apart should be used where possible.
- Handling facilities are well maintained.
- The age, mental and physical abilities of workers should form part of the risk assessment. No one below the age of 16 should handle cattle. There should be a specific risk assessment for anyone between 16 and 18 and over 65 which identifies additional control measures to address issues such as maturity or agility.
- The farm should adopt a rigorous culling policy for temperamental animals. They should not sell the problem animal to others.
- No one should enter an enclosure such as a pen if a dairy bull is loose.
- A person should only enter enclosures with cows and calves if it is absolutely required and if there is no safer way of carrying out the task. In all cases never enter the enclosure without first assessing the temperament of the cow.
- Handlers should understand zoonotic risk. Good welfare facilities (hot and cold running water, soap, towels) should be in place. PPE such as gloves and aprons should be provided and worn for high risk tasks e.g. assisting during calving.

Cattle – Collecting pen

- There should be enough room in the collecting pen for all the cattle.
- Consider how the cattle are pushed forward in the collecting pen into the race. A circular collecting pen allows staff to stand behind a forcing gate. Some farms use powered electric gates to move the herd forward into the race.

Cattle – Race

- There should be no use of makeshift gates and fences. Farms should be using a properly designed, permanently installed, race.
- The race should have a funnel end to allow cattle to readily enter the race.
- The cattle should be able to see to the crush and beyond.
- The race should not include tight turns. If necessary to change direction, the race should be curved.
- Sides of the race should be high enough to stop cattle getting out.
- The race should be properly secured to the ground.
- Sheeting the sides of the race helps to keep the cows moving and reduce possible signs of aggression. It reduces distractions, disturbances and possible causes of stress.
- The next animal to be worked with should be contained in the race while it waits its turn to enter the crush; a gate operated from the working side of the race is suitable for this. The farmer should not have to lean over the race to operate a securing gate. There should be no work on an animal in a crush with an unrestrained animal in the race behind.

Cattle – Crush – straightforward tasks

- Makeshift gates and fences are not suitable as alternatives to a crush. Use a properly designed crush.

- A standard crush is suitable for most tasks but it will need additional features to safely allow belly or foot trimming (see section below).
- The crush should have a locking front gate and yoke (self-locking are the best) so the animal's head can be restrained.
- The crush should:
 - Have a restraint bar to stop the animal tossing its head up and injuring people.
 - Have a rump rail, chain or bar to stop the animal moving forwards or backwards while in the crush.
 - Be secured to the ground or, if mobile, a vehicle and positioned so that the farmer can work safely around it.
 - Have a slip resistant floor of sound hardwood, metal chequer-plate, or rubber mat over the base.
 - Be positioned so that the farmer can work safely around it without risk of contact with other animals.
 - Have good lighting.
 - Be well maintained. All gates must open smoothly with minimum effort and noise.
- In addition, it is conducive to efficiency and keeping cattle calm to work at the crush undercover with a bench or similar nearby for documentation, medicines and equipment.
- If the animals need to be sorted into different groups after treatment in the crush, shedding gates should be used to minimise risk to people during sorting activity.

Cattle – Crush – belly and foot trimming

- Cattle for slaughter are usually required to be sent to the abattoir in a clean condition. The belly often gets soiled and matted. Good husbandry can keep cattle reasonably clean, but trimming may still be required. Cattle hooves can get long or overgrown and may need to be trimmed or cleaned out.
- The main risk during trimming is being kicked.
- Belly and foot trimming cannot be done safely on a standard crush.
- Where the farmer carries out belly or foot trimming the crush must have the features of a standard crush and the following:
 - The farmer should be able to open the bottom half of both the sides of the crush.
 - There should be no permanent vertical bars when these doors are open as these may become trapping risks.
 - The farmer should work facing the front of the animal, so he is not leaning into any possible kicking action from the cow.
 - An anti-kicking device or anti-kicking apron can further reduce the risk of kicking.

Cattle – Other equipment / miscellaneous

- Makeshift gates/barriers make handling more difficult and increase the risk of injury. Use a proper race, crush and shedding gates.
- Downer cattle – When dealing with an animal that can't stand (aka a downer cow) use appropriate lifting equipment / accessories which have been thoroughly examined. Keep people out of the way.
- Halters and ropes - Halters and ropes may be useful but will normally require specially instructed users and animals familiar with their use. Suitable ropes should be used. Bale string or similar cord is not acceptable. Restraining ropes/halters should not be wrapped around handlers' arms or legs so they can be released easily.
- Sticks/Flags - can be used as an extension of the handlers arm and as a guide to cattle. They give the handler a bigger appearance to the animal. A stick or prod should never be used to strike an animal. It may agitate the animal and make handling more difficult in future.
- Anti-kicking device - Before working on any animal the farmer must ensure that it is adequately restrained from kicking. An anti-kicking device may be used for this – see

illustration

- Flags – A small nylon flag on the end of a slender flexible stick works well for moving livestock. In a similar manner to sticks they may be used to make handlers look larger and encourage movement. Their use makes animals easier to guide in the desired direction by making movement behind or in front of the 'point of balance' This is the point to the side of an animal that encourages it to move forward or backwards in response to a threat or other stimulus.

Photographs of Flags and Anti-kicking device



Cattle – Working with cattle in fields

- The farmer should use mobile handling facilities and handling equipment where possible. Any mobile crushes should be secured e.g. to a vehicle when used in the field.
- There should be at least two people present if the farmer has to separate an animal in the field or if ear tagging a calf with the dam (mother) unsecured.
- A vehicle should be close to where the task is being carried out (to act a refuge)
- The second person should be watching the herd and actively dissuading animals or the dam from approaching too close. They should also be giving warnings when it is necessary to take avoiding action, e.g. getting into the refuge vehicle when the herd shows protective or aggressive signs.

Cattle – Handling bulls

- No one should enter an enclosure such as a pen if a dairy bull is loose.
- Anyone handling bulls must be trained, competent, fit and agile. Many incidents happen to people beyond normal retirement age.
- Having bulls ringed at 10 months allows for safer handling. Nose rings should be checked regularly.
- If a bull is taken out of its pen, suitable equipment should be used to secure and lead him. Suitable methods include:
 - Two people. One using a bullpole attached to the nose ring. The other using a rope/chain attached to a halter/head chain via the nose ring.
 - Two people. One using a rope/chain attached to a halter. The other using a rope/chain attached to the nose ring or through the nose ring to the halter.
 - One person. Using a bullpole attached to the nose ring and a rope/chain attached to the halter/head chain via the nose ring. Although not involved in moving the bull, another person should be on hand to control the bull if necessary.
 - If the bull is not ringed, other equally effective methods should be used e.g. halter and rope around the base of the bull's horns.
- If the beef bull is run with the herd, it should where possible be separated from the cows at milking time. If the bull cannot be safely separated the farmer should be able to show that it can be run through the milking parlour if the parlour is big enough and the bull can be kept quiet by feeding, or arrangements are in place to allow it to pass straight through the parlour.

- If the beef bull runs loose with the herd in cattle housing, the farmer should have taken steps to let other people know that he is loose and the precautions they should take.
- It is good practice to castrate bulls not intended for breeding, this can be done at 1 month old and reduces the risk of aggression in the bull as it matures.
- 'Bull-beef' should be kept in groups of 15-20 as they mature and must be held in secure pens. People should not enter the pens while the bulls are loose. Feeding should take place without entering the pen. Separate adjacent pens with gates that can be controlled from outside the pen allow bulls to be moved into an adjacent pen to allow change of bedding etc. Pens and gates should be strong enough and at least 1.5m high. Gates should be secure. Warning signs that the pens contain bulls should be displayed.
- No one should ever enter a pen containing bull-beef.
- No one should handle 'bull-beef' animals alone.

Cattle - Bullpens

- All dairy bulls should be kept in a purpose-built bull pen. They should not be tethered in cows' stalls or cubicles or run free in the yard.
- Dairy bulls must not be allowed to run through the parlour at milking time.
- A bull pen should:
 - Have a 215mm thick wall built of reinforced concrete blocks.
 - Be topped with railings of 48mm diameter so the bull can see out. See the cattle if possible.
 - Walls, fences and gates should be at least 1.5m high.
 - The gaps between bars in gates or partitions should be no more than 100mm.
 - External gates and doors to be kept locked with stockproof catches.
 - Allow feeding and watering from outside the pen e.g. through a hatch.
 - The feeding area should incorporate a yolk (or chain and spring hook if the bull is ringed) so that the bull can be secured without entering the pen.
 - The pen should include a separate exercise yard. The gate to the entry yard should be controlled from the outside of the pen. This allows the bull to be secured in the exercise yard while re-bedding the pen.
 - Have a service pen with a yolk or similar to secure the cows head.
 - Have a refuge or emergency escape route that a person can escape but nothing else can enter.
 - Have slip resistant floors, good drainage and good light.
 - Have a triangular yellow and black sign warning of the presence of the bull
- If you keep a beef bull in a bullpen it should meet the above standard.

Cattle – Bulls tethered in fields

- Sometimes a bull may be kept tethered in a field. If so:
- The tether should allow free movement with minimal risk of entangling the bull.
- The connection with the tether should pass through the nose ring regardless of whether a head collar or chain is used.
- No connection should be made direct to the nose ring.
- The tether should be firmly secured to the ground.
- Only bulls of good temperament should be tethered.

Cattle – Public rights of way (PROW)

- The farmer should never keep bulls of recognised dairy breeds in fields with PROW.
- The farmer should assess the temperament of all cattle in fields with PROW.
- No cattle that are known or suspected to be aggressive should be kept in a field with a PROW.
- Cows with calves should not, where possible, be kept in fields with PROW.
- It may be reasonably practicable to temporarily fence off PROW so that cattle can't put walkers or other users of the PROW at risk (especially cows with calves).
- If beef bulls are kept in fields with PROW they should always be with female stock.
- If beef bulls or cows with calves are in fields with PROW, signs should be displayed at every entrance to the field.

- Further guidance is available in AIS17.

Bales

- The farm should have a safe system of work when stacking and de-stacking bales.
- Bale stacks should be stepped back and interlocked.
- Bales should be stacked on firm, dry and level ground.
- People should be kept clear when stacking and destacking.
- All large bales should only be moved with mechanical equipment.
- Operators should be trained to use mechanical equipment e.g. telehandlers.
- No stacking should take place within 10m of overhead power lines measured horizontally from the lines.
- The farmer should monitor the stack regularly and deal with any problems such as instability caused by settling.
- Ladders should not be left next to stacks.
- Large bales - single or double bales stacked and the next layer should overlap by half a bale to tie in. The maximum height of the stack is one and a half times the width of the base.
- Round bales – should be stacked on their sides with the bottom row chocked to prevent rolling. Each layer should be set half a bale back to create an overlap. Stacking 'on end' should only occur in buildings where bales are prevented from falling sideways by strong walls (but consider openings / doors to those buildings). The maximum height of a stack for round bales is 3 times the diameter of the bales.
- Bales on trailers – sound bales should be used for edges. Bales should be interlocked. People should not ride on loads. People must be kept away during loading / unloading – bales often fall or collapse. The vision of the driver should not be obscured by the load. The load should be secured by ropes with a double rope at the rear as this end is less stable and tends to sway. Trailer tyre pressures should be checked. No unsafe work at height on trailers is permissible. Mechanical means should be used to move, load or unload bales.
- Safe stop should be followed when getting out of vehicles (handbrake on – controls neutral – stop engine – remove key).
- Tractors used to move bales using a fore-end loader should have ROPS and FOPS fitted. A roll bar is not enough.
- Ensure tractors and telehandlers are maintained and where necessary thoroughly examined – mirrors etc.

Slurry

- Toxic gases are generated in slurry. They may be released when the slurry is disturbed / stirred. Gypsum / silage effluent etc added to slurry can further increase gas levels. It is recommended that gypsum is not used in bedding which is then transferred to slurry pit as it increases the amount of toxic gas in the slurry.
- The farm should have considered how to deal with slurry mixing. Does the farmer agitate on a windy day if possible? Has he understood and considered the risks? Does he know how his slurry system is connected to the farm buildings and therefore where gas can emerge? Does he check that covers are closed and in good order?
- People should stay out of buildings connected to a slurry storage system when mixing or pumping and leave the buildings ventilated for at least 30 minutes after stirring has stopped before re-entering or approaching. Gases build up too quickly to detect by hand held monitor, the primary control measures are keeping people away from likely affected areas during and after mixing. Mixing from a well-ventilated point and opening all doors and windows before mixing.
- People should never stand over slurry mixing points, reception pits or slats. Mixing points should be outside. Slurry gases may be flammable there should be no sources of ignition (no smoking)
- When there is no alternative to working inside a slurry storage system or a sealed grain/forage silo, farmers must use specialist contractors competent in confined spaces work.
- Slurry lagoons – should be fenced according to risk. Children and drivers of scraper tractors are at higher risk. Fencing should be at least 1.3m with 2 strands of barbed

wire 100 to 150 mm apart along the top of the fence. There should be a tractor stop barrier strong enough to stop a sliding tractor (so made of concrete or steel). The apertures in the fencing for suction pipes and where tractor stop barrier is should also be guarded to same standards as the fencing including barbed wire. Gates / access points should be padlocked. The farmer should inspect the fencing / gate / padlock.

- Slurry towers – planned maintenance is important. Maintenance is safer when the slurry tank is empty and has been washed through. Hydrogen sulphide is corrosive to metal and weakens concrete, hence the need to inspect the tower. Precautions should be taken regarding the gases during maintenance. People should never work alone when maintaining slurry systems. Any confined space work must be carried out by contractors, or by other trained and competent people with the right equipment.

Child Safety

- Where children live on the farm or frequently visit the farm, the farmer/ dutyholder should have arrangements to ensure children are kept safe.
- Children under 13 should not operate or ride on agricultural vehicles including ATVs, there is a specific absolute legal prohibition in the Prevention of Accidents to Children in Agriculture Regulations. Older children may only operate simple machines that are suitable for their age and maturity (HSWA and MHSW Regs).
- Children under school leaving age (normally 16) should not be in work areas of the farm unless fully and directly supervised by an adult not involved in any work activity.
- There should be a safe and secure play area for children away from the farm yard.
- If children are ever on the farm they should be with a responsible person who understands the risks on the farm and is not engaged in any activity other than to look after the child.
- Harvesters, spreaders, machines with power driven soil engaging parts, adult sized ATVs and other self-propelled machines can only be operated by persons over 16.

Appendix 5.1.2 – IEE for managing risks from cattle

NB: Should an Inspector identify that there is (or is likely to be) a risk of serious personal injury arising from any of the situations below, then they should consider issuing a Prohibition Notice, regardless of the IEE indicated in the table.

CATTLE – HANDLING AND HOUSING		
Situation	IEE	Comment
Stock tasks are carried out on unrestrained animals	IN/NOC	Working on unrestrained animals presents a foreseeable and significant risk. If being carried out the time a PN should be considered.
Doors/gates in the race are operated from within the race	IN/NOC	Persons should not be mixed in with animals moving through a race. There should be segregation and this is best achieved from the handlers being outside the race. Gates etc. need to be designed and installed so they can be operated from outside.
Working in the crush with an unsecured animal waiting in the race behind	NOC	There should be arrangements in place to prevent the waiting animal entering the crush until the crush is empty
Crush does not have a self-locking gate, a yoke and rump rail/bar	IN/NOC	The crush should contain and secure the animal. If working near the head from outside the crush, additional head restraint may be required to prevent headbutting.
Bull being walked with no segregation without a bull pole or halter	IN/NOC	PN should be considered if this is a regular task that is or is likely to occur especially if it is a dairy bull.
Persons entering an enclosure when a bull is loose	IN/NOC	Consider a PN if the activity is taking place or is likely to. There should be a system of segregating or restraining a bull before entering any pen or enclosure.
No or inadequate bull pen for dairy bull	IN/NOC	AIS 35 gives the standard and requirements.
Gates or facilities not well maintained, difficult to move, 'lashed up'	IN/NOC	Poorly maintained facilities can present a manual handling risk, as well create noise that can adversely affect animal behaviour. Gates, fences can fall over etc if not properly maintained. Bailing twine is not suitable to hold cattle facilities together.
Unstable race or crush	PN	If they fall they can cause serious injuries especially if animals are present.
No floor in Crush	PN	Without a floor or a damaged floor animals can move or walk off with the crush, or cause it to tip over.
Damaged floor in crush	NOC	The floor needs to be intact and maintained to prevent animals getting purchase on the ground beneath. Animals need a sure footing to remain calm.
Poorly designed facilities	IN/NOC	Good facilities are required along with a SS of W to ensure stock tasks can be carried out without risk of injury.
CATTLE – FIELDS WITH PUBLIC ACCESS		
Dairy bulls of recognised breeds are kept in fields with public access	PN/consider PR	AIS 17 specifies the recognised breeds but no dairy bull should be in a field with

		public access. This is long established.
Cows with calves at foot are grazed in fields with public access when there are fields available without public access	IN/NOC	A herd management approach is needed when available land consists of fields with and without public access. The herd should always be managed to ensure potentially high-risk situations such as cows with young calves are not in fields with public access.
No signs at likely access points to fields to advise of beef bulls or cows with calves	NOC	Signs should be present, not to warn of a risk (as animals that pose a risk should not be in the field), but to inform the public in case they want to take an alternative route.
CATTLE – FIELD WORK		
No suitable vehicle (or similar means of achieving a safe place) used in field when carrying out tasks on stock	NOC	The vehicle is a refuge in case stock become agitated
No mobile handling facilities or SSW for stock tasks	IN/NOC	When separating animals especially calves, there should be adequate arrangements to ensure the mother or other elements of the herd cannot contact the handler.

DROWNING AND ASPHYXIATION		
Confined space entry is likely to take place but there is no RA	IN	If there is a risk assessment and the person who has carried out it out is not competent an IN would be suitable
Avoid working in a confined space	PN	If the task can be carried out without entry, or from outside
A professional contractor is not being used and in-house staff are entering the confined space who have not been adequately trained	PN	Entering confined spaces is a hazardous activity and should only be done so by persons who have been adequately trained.
There is no SSW for those entering a confined space	PN	Entering confined spaces is a hazardous activity and a SSOW is required to ensure the safety of those undertaking the work
The RA or SSW does not identify suitable emergency arrangements	IN (PN if work being carried out at time)	Emergency arrangements should not rely solely on the emergency services
No or inadequate arrangements to ensure people stay out of buildings connected to the slurry storage system during mixing/pumping	IN/NOC	Consider PN if people are inside a store with a slatted floor above slurry being stirred or agitated. Do not enter the building yourself
Indoor stirring point being used for slurry mixing/pumping	PN	If an indoor stirring point has to be used, air fed respirators will be required along with all other CS controls. Do not enter the building yourself
People standing over mixing points whilst mixing/pumping place	PN	The stirrer should be started, people then kept away from buildings and stirring points. After 30 mins can return to turn off stirrer (up wind) and move away again for at least another 30 mins. Do not approach the stirring point yourself
The personal capabilities of each	IN	PN if the work is being carried on at the

individual entering the CS have not been assessed		time of the visit, or from talking to those entering the CS medical issues are identified
No emergency plan or inadequate emergency plan	PN	If work is not going to be carried out within 21 days an IN may be considered
RA and SSW not provided to those entering	PN	If work is being carried out without a SSW or there is a SSW but it those entering have not been adequately instructed and informed
Are detectors used where there is a risk of oxygen depletion or toxic gas	PN	Gas detectors are not suitable for slurry gas due to the levels required to cause an alarm alert. There will not be adequate time once the alarm raises to get a person out of the area
If PPE and detectors are used and they aren't calibrated and tested	PN	

CHILDREN – (See vehicles section for IEE's relating to children and vehicles)

Situation	IEE	Comment
Unsupervised children are present in the workplace	PN	Adequate supervision can only be achieved if those supervising are not engaged in any aspect of a work activity.
Children don't have a safe and secure play area away from the hazards of the farm	IN	It must be clearly understood and defined where the home stops and the work areas begin. Children must be provided with a safe and secure play area that adequately confines them to only safe locations.
Children under the age of 13 riding or driving agricultural vehicles	PN consider PR	See the machinery /vehicles section of this table for more details.
Signs are not present on the entry to the farm to warn that children may be present	NOC	Employees and visiting drivers etc. should be made aware that that they must stop if they see a child on the farm and make sure the child has been returned to a safe area
Slurry lagoon not fenced	IN	Long established standard to prevent people (including children) falling into slurry.

AGRICULTURAL VEHICLES

Situation	IEE	Comment
Safe stop Safe stop is not practiced and there are no alternative arrangements for preventing vehicle movement when the operator leaves the cab or maintenance activities are carried out with the machinery running.	IN	Leaving the vehicle operating position without applying the handbrake is a common cause of fatal incidents. IN for instruction and training, supervision Before leaving the driver's seat/operating position: - Engage handbrake - Controls in neutral - Switch off engine (or turn off power) - Remove key (or lock-off the power supply)

Safe stop Keys left in vehicles/self-propelled machines	NOC	Where there is a risk of use by unauthorised/untrained operators and children. Key security arrangements
Operating vehicles on slopes - no operator roll over protection	PN/PR	To prohibit the use of the vehicle where there is significant risk of roll over until a roll over protective structure and a restraining device have been fitted. PR especially if Tractor Cabs Regulations breached (Some vehicles will require specialist advice regarding suitability of ROPS)
Operating vehicles on steep slopes - only a roll bar or incomplete cab is fitted	IN	To require the fitting of a restraining device.
Operation of vehicle on steep slopes indicates lack of adequate training.	PN HSWA S2 or S3 PUWER Reg 9(1)	Where a driver is, or will shortly be expected to, have to drive on slopes where due to the slope or operations involved, overturning is possible.
Operation of vehicle on steep slopes indicates lack of adequate training.	IN HSWA S2 or S3 PUWER Reg 9(1)	As above but operations are not imminent.
Vehicle driven with open door or seat belt not worn.	NOC/IN HSWA S2 or S3	A seat belt acts as a restraint to reduce the level of injury to the driver during a collision or roll over. Many fatal injuries have been received on vehicles with adequate ROPS due to the driver not wearing the restraint provided. Open doors also increase the risk of injury during a roll over and allow higher noise levels inside cabs.
Poorly loaded vehicle.	NOC/IN WAH Reg 10	Consider the stability of products, overall weight and distribution, methods of retention, condition and suitability of the vehicle/trailer and restraints.
Reversing when RP to not do so.	NOC/IN HSWA S2 or S3 Workplace Reg 17	L24 ACoP: The need for vehicles with poor rear visibility to reverse should be eliminated as far as possible, for example by using one-way systems. Establishing turning circles can also promote compliance.
Child under 13 is a passenger in a tractor or self-propelled agricultural machine being used for agricultural work or which is travelling to or from such work.	PN/PR PACCAR Reg 3	Only passengers over 13 may ride in these vehicles in connection with agricultural work, and then only when restrained within a passenger seat.
Child under 13 is a passenger in a trailer and not riding on its floor or on the load with adequate means to prevent the child falling.	PN/PR PACCAR Reg 3 PUWER Reg 25	

Carrying passengers over 13 on mobile equipment without provision for carrying them safely.	PN/PR PUWER Reg 25	PN if adult passenger in tractor cab or similar vehicle without passenger seat as their presence reduces access to vehicle controls, decreases visibility and represents a hazard to the driver in the event of a collision or roll over. Consider PR if the risk of serious personal injury is probable, e.g. the passenger is on a trailer drawbar, tractor linkage, cab steps, forks/buckets of materials handling equipment or on a single seat ATV.
Person mounts or dismounts a moving vehicle	PN HSA S2 or S3	
Lack of formal training and test/assessment for operators of telescopic handlers, lift trucks and ATVs.	IN PUWER Reg 9(1)	In the absence of formal training operators often cannot explain how to use load indicator chart on telescopic loader or the importance of correct tyre pressures and body positions when operating ATVs.
Head protection for ATV use not worn or provided.	PN/PR PPE Reg 4(1) or 4(2)	Consider PR if ATV being used as opposed to just being available.
ATV tyre pressures not checked.	IN PUWER Reg 6(2)(a)	An accurate low-pressure gauge should be provided and be available. The operator should know the pressure recommended by the manufacturer.
No pre-use check of ATV brakes and throttle.	IN PUWER Reg 6(2)(a)	Brakes should give a safe straight stop. Brakes can have a relatively short life in the farming environment and need frequent cleaning, regular adjustment and proper maintenance. A throttle should operate smoothly in all steering positions.
Inadequate pedestrian safety.	IN Workplace Reg 17	Higher risk locations include around potato grading lines, materials handling areas such as produce and bale stacking/de-stacking and building and yard entrances. Consider Workplace Reg 8(1) if lighting is insufficient or unsuitable or PPE Reg 4(1) or 4(2) if high visibility clothing is absent but necessary.
Driver visibility is impaired due to excessively dirty windows and visibility aids.	NoC PUWER Reg 5(1)	
Broken or missing visibility aids on telescopic handlers and tractors towing large trailers.	PN PUWER Reg 28(e)	
Inadequate visibility aids or audible warning aids on any vehicle.	IN PUWER Reg 28(e) or 24(1)	Where foreseeable hazards exist which could be reduced by the fitting of such aids.
Significant corrosion or damage to a	IN	Defects in the condition of the structure

cab structure that acts as a ROPS.	PUWER Reg 5(1) Agriculture (Tractor Cabs) Reg 3(8)	should be repaired and inspected by a competent person. Note: Repair or modification to structural components of a tractor safety cab (e.g. by welding or drilling holes) will immediately invalidate the original Test Approval if this results in a material change. Reg 3(8) An approved safety cab shall cease to be approved if it is materially changed as a result of damage, alteration, neglect or any other cause
Inadequate braking of any vehicle.	PN PUWER Reg 5(1)	

MACHINERY – SAFE USE		
Situation	IEE	Comment
Operating inadequately guarded machinery: Machinery in use or where use is imminent has missing guards or is inadequately guarded	PR	Access to dangerous parts of machinery (rotating shafts, powered rollers, chain and sprocket drives, etc) where there is a foreseeability of contact with the dangerous parts from the operating position or maintenance with the machine running is undertaken
Inadequately guarded machinery: Machinery likely to be used imminently	PN	Access to dangerous parts of machinery (rotating shafts, powered rollers, chain and sprocket drives, etc) where there is a foreseeability of contact with the dangerous parts when the machine is running or being maintained
Inadequately guarded machinery: Machinery likely to be used in the next 3 – 6 weeks	IN	Access to dangerous parts of machinery (rotating shafts, powered rollers, chain and sprocket drives, etc) where there is a foreseeability of contact with the dangerous parts from the operating position when the machine is used. IN for guards to be replaced/fitted/repaired.
Operating mobile PTO driven equipment – inadequate PTO or PIC guards	PN + PR	PTO shaft is inadequately guarded, and the machine is in use or is about to be used.
Operating mobile PTO driven equipment – inadequate PTO or PIC guards	PN	PTO shaft is not easily accessible e.g. close-fitting linkage mounted sprayer.
Operating mobile PTO driven equipment – inadequate PTO or PIC guards	PN + PR	If damaged guard already reported to management and employee required to continue work (PR employer)
Suitability of work equipment – Use of unsuitable equipment for the task	PN	Where risk of risk of injury e.g. crushing / struck by falling objects. Examples include: Excavator buckets used for driving fence posts, bale spike used for lifting other than bales, telehandler/forklift used as a makeshift vehicle lift during maintenance.
Operator training – for self-propelled,	IN	Where machine operator can be shown by

trailed, stationary (e.g. grading lines, fleece and rope winding machines, grain dryers), or workshop machinery		lack of experience or accident, or by observed poor practice, to be in need of training. Understand operating instructions, know how to start and stop the machine safely and from the correct position, understand how to carry out safe stop and how to safely clear blockages. Training may be provided by the supplier (installation training), in-house, or for some equipment formal training is available (e.g. Lantra). Operators should have access to the instruction manual.
Area around fixed or stationary machines not adequately lit, not clean, tidy and free from obstruction.	IN/NOC	Workplace Regs 8,9 & 12

MACHINERY - MAINTENANCE		
Situation	IEE	Comment
Safe stop Safe stop is not practiced, and maintenance is being carried out with the machine running or all power not isolated (including stored energy in springs/hydraulics/pneumatics))	PN/PR	Operator is seen intervening with a machine without carrying out safe stop (e.g. clearing a blockage). Risk of machine restarting when blockage is cleared (e.g. contra-rotating rollers on potato harvesters) or risk of other operators restarting machine during the maintenance intervention.
Safe stop Safe stop is not practiced and there are no alternative arrangements for preventing vehicle movement when the operator leaves the cab or maintenance activities are carried out with the machinery running.	IN	Where operator is seen leaving the vehicle operating position without applying the handbrake there is no maintenance ongoing but lack of use or lack of general awareness of Safe Stop is established from discussion
Maintenance work under vehicle/machine cabs, bodies, access covers or trailers that are not adequately supported	PN	Maintenance under raised vehicle/machine bodies, trailers, etc., without using adequate jacks, chocks or supports so relying on machine hydraulics or pneumatics. Also use of inappropriate lifting equipment, e.g. forklift/telehandler to raise vehicle/machine being maintained. Risk of vehicle/machine falling or descending in an uncontrolled manner. WAH Reg 10(1)
No systems for isolating or marking machinery that is not safe to use, e.g. during maintenance if guards are removed	IN	Disable or electrically isolate electrical machinery, lock-off and warning notices attached.
Maintenance workshops – electrics, pressure systems, cutting, welding, lifting equipment and accessories, etc		Treat as any other industry, e.g. MVR

MACHINERY – LIFTING

Situation	IEE	Comment
Equipment which lifts loads over or close to people, such as telescopic handlers, lift trucks and foreloaders on tractors, without adequate operator protection, or other people will be in close vicinity, has not been thoroughly examined at 12-month intervals.	IN LOLER Reg 9(3)(a)(ii)	If no one is at risk from failure of the lifting equipment, e.g. where there is operator protection and no other persons will be present, then a thorough examination may not be required. But this decision can only be justified after carrying out a suitable risk assessment.
Other lifting equipment not thoroughly examined in the last 12 months, e.g. workshop hoist	NOC/IN	Note: LOLER does not apply to three-point linkages on tractors, bale elevators, grain augers or tipping trailers but all of these will need to be maintained under PUWER
Lifting accessories not thoroughly examined every six months.	IN LOLER Reg 9(3)(a)(i)	
Equipment used to lift people not thoroughly examined every six months	IN LOLER Reg 9(3)(a)(i)	If item appears to be in poor condition, PN.
SWL clearly marked on lifting equipment and accessories	NOC/IN	And must not be exceeded

BALES AND TRAILERS

Situation	IEE	Comment
Bale stacks not stacked on firm, dry and level ground	IN	If bales are not stacked on firm, dry level ground, it is foreseeable deterioration will occur. A PN should be served if the stack is unstable at the time.
If bale stacks are seen to be unstable	PN	
If stacks are not tied/interlocked or stepped back in line with INDG125	IN	A safe system of work will need to be in place until the IN is complied with to ensure persons aren't in the area. If this can't be achieved a PN should be served preventing access to the area until the bales have been restacked.
Bale stacks are constructed under OHPL's	IN	A PN may need to be considered to prevent work until OHPL's have been turned off if there is risk of contact.
Rider operated equipment being used without FOP's	PN	
Work is being carried out near the edges of stacks or trailer beds	NOC	PN should be served if the work is observed and there is an immediate risk in order to prevent a fall of a distance likely to cause personal injury
Bale stacks are regularly inspected for signs of deterioration	IN/NOC	It is essential even stacks properly constructed in line with INDG125 are regularly inspected.
Those tasked with stacked or de-	NOC/IN	Stacking is a skill and it essential there is

stacking bales have not received adequate information and instruction and there is no SSW		a SSW and instructions on how to construct stacks and de-stack in line with INDG125
Bales transported on trailers are not secured	IN/NOC	If being carried out and there is a risk to persons or structures a PN would appropriate.
People not kept well out the way of any loading/unloading of bales	PN	Pedestrians should be excluded from areas where bales could fall during loading or unloading
Big bales are being moved by hand	PN	Big bales can weigh up to 600kg so as well as the risk of them falling onto people, they present a significant risk manual handling risk if they are being handled by hand.
Round bales are stacked on their end	IN/NOC	Stacking on the ends can compromise the integrity of the stack. They should be stacked in their sides, chocked and as described in INDG125.
Round bale stacks are visibly unstable	PN	Persons should be prohibited from being near the stack and only lifting equipment with FOP's used to remedy the stack

ELECTRICITY – ELECTRICAL SYSTEMS AND PORTABLE EQUIPMENT

Situation	IEE	Comment
Poorly designed or badly maintained fixed electrical systems	PN/IN	Fixed systems should be properly designed. Consumer units, switches, wiring, sockets and plugs all in good condition. There should be no 'daisy chaining' of extension leads or over use of adaptors. Expectation should be no different to other industries and if it looks wrong it probably is. EAWR 1989 Reg.4(1)
Fixed systems not inspected	NOC	Inspection and testing by a competent electrician. HSE guidance gives no recommended interval. BS7671 IET Wiring Regulations 18 th Edition recommends maximum period of 3 years for agricultural and horticultural settings. LANTRA workbook recommends testing by a qualified at least every 5 years. EAWR 1989 4(2)
Power cables to fixed machines not adequate. Covers to electrical equipment open.	NOC/IN	Power to machines should be in armoured cable or installed in conduit with a good earth connection. Emergency cut off switched close to all fixed machines. Keep all covers closed. EAWR 1989 Reg 4(1), 6, 7
No RCD on sockets used outdoors or in damp/corrosive atmospheres, or where they can be reached by steam or water jets. Unsuitable (domestic) type sockets in use in these areas.	PN/IN	RCDs should also be tested regularly using the 'test' button. EAWR 1989 4(1) and 6
Poorly maintained portable equipment, e.g. cracked housings, damaged cables exposing inner	PN/NOC IN for maintenanc	PN if immediate risk e.g. in use and exposed live conductors or risk of ingress water. IN for

wires/conductors, cable glands/chord grips pulled out, broken plugs	e, inspection, testing regime.	maintenance/inspection/testing regime. Users should undertake brief visual checks of portable appliances before use with more formal visual inspection and combined inspection and test by a competent person at frequency determined by type of equipment and environment it is used in. Suggested frequency in HSG107, e.g. heavy industrial/high risk of damage areas there should be weekly formal inspection and inspection and test at 6-12 month intervals. http://www.hse.gov.uk/pubns/priced/hsg107.pdf EAWR 1989 Reg 4(2)
Domestic 240v tools used outdoors without RCD	PN/IN	Electrical tools used outdoors or where there is a lot of earthed metalwork should be reduced voltage (110v) or connected through an RCD. Suggest using alternatives, e.g. air or battery tools. EAWR 1989 Reg 4(1)
Pressure Washer used without RCD	PN/IN	EAWR 1989 4(1) & 6. Do you use a steam/water pressure cleaner? http://www.hse.gov.uk/pubns/indg68.pdf and <i>Electrical risks from steam/water pressure cleaners Guidance Note PM29</i> http://www.hse.gov.uk/pubns/priced/pm29.pdf

MUSCULO-SKELETAL DISORDERS

Situation	IEE	Comment
Based on the level of risk it is reasonably practicable for hazardous manual handling / repetitive tasks to be eliminated.	IN	Hazardous manual handling / repetitive tasks that pose a risk of serious personal injury can often be eliminated through automation (such as using conveyor belts, use of mechanical means etc.).
A suitable and sufficient risk assessment has not been carried out to determine the level of risk from any hazardous manual handling / repetitive tasks which cannot be eliminated	IN	Where hazardous manual handling / repetitive tasks cannot be eliminated a risk assessment should be carried out to determine the level of risk and identify any further risk control measures. The assessment should assess the task, individual carrying out the task, the load, and the environment. The risk assessment may be a simple MAC assessment, or it may need to be a full risk assessment which fully considered those elements set out in Schedule 1 of MHOR
Based on the level of risk it is reasonably practicable for hazardous manual handling / repetitive tasks to be reduced through provision of mechanical aids	IN	Manual handling / repetitive tasks can often be reduced through provision of mechanical aids (such as provision of trolleys, lifting tables etc.)

Based on the level of risk it is reasonably practicable to improve the ergonomic design of the work station / area to reduce the risk from hazardous manual handling / repetitive tasks	IN	The design of the work station (e.g. at potting stations) can often be improved to reduce periods of poor body posture e.g. repetition of upper body movement, bending, twisting etc.
Job rotation, rest breaks are specified in the risk assessment as a control measure but in practice they are not happening on the shop floor	IN	Job rotation / frequent short breaks are reasonably practicable ways of reducing the risk from hazardous repetitive tasks. If significant risk can be reduced through job rotation / rest breaks and if it is a control measure that is specified in the risk assessment then it is for the company to ensure that it is implemented.
Where hazardous manual handling / repetitive tasks cannot be eliminated and have been reduced as far as reasonably practicable, it is still important that those exposed to the residual risk from hazardous manual handling / repetitive tasks have received adequate training in how to carry out manual handling and safe use of any equipment that they are expected to use	IN	Provision of manual handling training should not be a first option. Elimination assessment and reduction should be considered first. Training should be relevant to the tasks which the individual is required to perform and should cover: manual handling risk factors and how injuries occur, safe manual handling techniques, systems of work for the tasks, use of mechanical aids, practical work to allow trainer to identify and remedy poor technique.

WELFARE (ZONOSSES)

Situation	IEE	Comment
Failure to provide suitable and sufficient toilets.	IN	Toilets to the standard and number set out in the ACOP (see Appendix 1) should be provided at static farm sites. However, Reg 20 (provision of toilets) applies to farming away from the farmyard (ie a field) SFAIRP. If farming equipment can be taken to the field, then so should welfare provisions if the activity will last for any amount of time that it is likely that employees will need welfare provision.
Toilets are provided but they are not up to standard e.g. not clean, do not have lockable doors etc	NOC / IN	Toilets (even those provided for work away from the farm) should be clean, well-ventilated, well lit, toilets with a lockable door (cabins are preferable but chemical toilets are acceptable). If welfare provision is provided there is no reason that it cannot be kept clean. If the farm is failing to ensure that toilets are kept clean, a cleaning rota may be needed.
Failure to provide washing facilities to the level required by the regulations	IN	Washing facilities to the standard and number set out in the ACOP (see Appendix 1) should be provided at static farm sites. However, Reg 21 (provision of washing facilities) applies to farming away from the farmyard SFAIRP. If farming equipment can be taken to the field then so should welfare provisions if the activity will last for

		any amount of time that it is likely that employees will need welfare provision. Where it is reasonably practicable to provide washing facilities, at least cold running water, soap, towels, and basins large enough to wash forearms should be provided
Washing facilities on the premises do not meet the standard specified in the regulations	IN	Wash basins with hot and cold (or warm) running water, soap and towels (or a hand dryer) – basins should be large enough to wash forearms
Failure to provide drinking water	IN	Reg 22 (provision of drinking water) applies to farming away from the farmyard SFAIRP. Adequate supply of drinking water can be provided. It is reasonably practicable to take sufficient supply of bottled water for employees required to work away in the fields etc If shared supply of drinking water is provided then cups should also be provided.

OCCUPATIONAL LUNG DISEASE

Situation	IEE	Comment
Not wearing RPE where there is evidence that significant dust is generated with no mechanical means of protecting the operator	IN	RPE with a minimum APF of 20 eg. FFP3
Evidence of significant dust generation and vehicles being used with windows down or cab not fitted with suitable ventilation and not wearing RPE.	IN	Vehicles fitted with suitable ventilation and adequately maintained will prevent significant exposure to dusts where processes are generating dust (e.g. straw chopping). RPE with a minimum APF of 20 eg. FFP3 where significant dust is generated.
Significant welding in buildings with no mechanical means of dust extraction	IN	Welding in agriculture is frequently of short duration or in the open air. However, some farms may have a dedicated workshop and do a significant amount of fabrication.
Cleaning and removal of residual dust or dry manure using hand- held stiff brushes, flails or compressed air. Not wearing RPE with a minimum APF of 20 eg. FFP3.	IN	Very high levels of dust expected. Not using wet cleaning techniques, such as, damping down or wet mopping or not using a vacuum cleaner and not wearing RPE with a minimum APF of 20 eg. FFP3 where significant dust is generated.
RPE not maintained or no face fit test for tight fitting masks	IN	Incorrectly fitted or maintained RPE will not provide the protection required.
Health surveillance absent and the dust controls are not fully effective, resulting in a possible risk of occupational asthma and COPD	IN	Discuss with Occupational Health

5.2 Inspection in support of Agriculture Compliance Events

Introduction

Four regions have been selected to run HSE's Agriculture Compliance Events (ACEs) during May and June 2019. These events will be linked directly to inspection activity within the same area - see table below. The inspection activity will take place approximately three months after the ACEs

Regions selected to hold farm agriculture compliance events are:

Yorkshire & NE	North Yorkshire
South East	East and West Sussex
Midlands	Leicestershire, Northamptonshire, Warwickshire
Scotland -Borders	Dumfries & Galloway; Cumbria

Further details on location and dates can be found in CM9 record no: 2019/118763

HSE has contracted Lantra to organise and deliver classroom-based training events to farmers. The events will clearly set out the legal requirements and help farmers understand how to comply. The events will be delivered by experienced Lantra training providers using suitably accredited instructors. The focus will be on the practical steps that farms can take to ensure compliance ahead of the programme of inspection visits in mid Q3 to early Q4.

The Sector will provide FOD with four lists (one for each region) of farm premises after the ACEs have been delivered. The list will detail which farms attended and which farms declined the invitation.

FOD are asked to carry out visits to farms in each of the four regions. See the T&I document from DST for detail. Inspection visits should be carried out between October 2019 and January 2020.

The sector is providing briefing sessions in Q2 (July/August) for FOD inspectors carrying out the Q3/Q4 inspection. These sessions will also cover enforcement expectations where poor standards are found.

Background

For many years HSE ran agricultural safety and health awareness days (SHADs) as a way of raising the awareness of safety and health issues amongst hard to reach farmers.

Last year we changed to a model where a series of regional events were linked to inspection activity targeted at promoting sustained compliance with long established legal duties and standards and thereby drive up standards on farms. These new events will continue this year and will dovetail with the FOD inspection programme and specifically targeted communication activities to reinforce to farmers the expected standards for compliance in the agricultural industry. Information from inspection visit reports and direct feedback will be used as the basis of industry wide communication and improving future events.

The approach builds on HSE research into farmers' attitudes to risk to ensure compliance with long standing requirements and improved standards of health and safety performance. It works in parallel with partnership work, with industry stakeholders, to significantly change attitudes and behaviours in relation to health and safety and will be used to define the norms of good health and safety performance in agriculture (e.g. not accepting anyone using an ATV without a helmet and training or operating any machine at any time with an incomplete or missing PTO shaft guard).

Timing

FOD Inspection activity will take place October 2019 to January 2020

Recording and Reporting

Follow the arrangements in the main body of the OG. Use Coin Inspection Type 'AGCOMP' to

distinguish visits from those completed under the fresh produce programme.
Health and safety
Inspectors should follow 'HSE guidance for inspectors when visiting farms' and HSE guidance on biosecurity practices when visiting farms . It is essential that exemplary standards of bio security are followed to avoid reputational risk to HSE in the event of alleged disease transmission.
Inspection
Inspection will concentrate on the main causes of fatal accidents (which will have been covered at the events), and ill health. Farmers that attend an agriculture compliance event will have received a leaflet ('What a Good Farm Looks Like') containing simple statements of what a farm complying with health and safety legislation looks like in terms of management of safety and health risks to help them understand what they can do and should have in place. Any MPMC and MEC encountered should be addressed (OC18/12)
Enforcement expectations
Inspectors should consider those issues set out below in the Priorities section where relevant at each visit. Initial Enforcement Expectations for some commonly identified issues are set out in this OG (see below). Additional detail will be provided at the briefings.
Priorities
Ensure farmers, including the self-employed, understand and manage the H&S risks associated with running their farm: Are they complying with long standing legal requirements and understand why these are important to prevent injury and ill health? Where relevant concentrate on: ○ Child Safety (e.g. not on the farm, not on machines, provided with safe play areas and if going onto the farm fully supervised at all times) ○ Transport and machinery safety (including ROPS, Seat belt use, ATVs (helmets- training and maintenance), Safe Stop, Guarding of PTO shafts; machinery maintenance and statutory examination, safe site, driver behaviour etc) ○ Cattle (handling, protection of the public on rights of way, facilities including crushes) ○ Falls from height, something collapsing and falling objects e.g. bale stacking, working on fragile roofs, access equipment, ladders ○ Overhead power lines (OHPL's) and electrical systems ○ Entry or accidental entry into confined spaces or slurry lagoons Additionally, inspector may wish to look at any of the following when encountered ○ Manual handling ○ Design and maintenance of pesticide stores ○ Training – including use of chainsaws ○ Duty to manage, and control work with, asbestos ○ Respiratory hazards – dust, fume Take effective enforcement action to secure compliance with matters giving rise to significant risk of injury and ill health. The Sector has access to considerable accident and ill health history. Farms should not be treated any differently than any other workplace.
Guidance
Farmwise
Contacts
Agriculture Sector – Health, Engagement, Livestock & Pesticides Team Adrian Hodkinson – Sector Principal Inspector - 020 3028 2683 Nick Sangha – Sector point of contact for the events - 020 3028 1745

Agriculture – Forestry, Arboriculture and Agricultural Machinery Team

Andrew Turner – Sector Principal Inspector – 020 3028 2755

Luke Messenger – Agricultural Machinery – 020 3028 1739

5.2.1 IEE for inspections following Agriculture Compliance Events

NB: Should an Inspector identify there is (or is likely to be) a risk of serious personal injury arising from any of the situations below, consider issuing a Prohibition Notice, regardless of the IEE indicated in the table.

Livestock – housing and handling cattle

WaGLL p10 – Lantra workbook p21

Situation	IEE	Comment
Stock tasks are carried out on unrestrained animals	IN/NOC	Working on unrestrained animals presents a foreseeable and significant risk. If being carried out the time a PN should be considered.
Doors/gates in the race are operated from within the race	IN/NOC	Persons should not be in the race with animals. There should be segregation of people from animals. Gates and similar barriers need to be designed and installed so they can be operated from outside the race.
Working in the crush with an unsecured animal waiting in the race behind	NOC	There should be arrangements in place to prevent the waiting animal entering the crush until the crush is empty
Crush does not have a self-locking gate, a yoke and rump rail/bar	IN/NOC	The crush should contain and secure the animal. If working near the head from outside the crush, additional head restraint may be required to prevent headbutting.
Bull being walked with no segregation without a bull pole or halter	IN/NOC	PN should be considered if this is a regular task that is or is likely to occur especially if it is a dairy bull.
Persons entering an enclosure when a bull is loose	IN/NOC	Consider a PN if the activity is taking place or is likely to. There should be a system of segregating or restraining a bull before entering any pen or enclosure.
No or inadequate bull pen for dairy bull	IN/NOC	AIS 35 gives the standard and requirements.
Gates or facilities not well maintained, difficult to move	IN/NOC	Poorly maintained facilities can present a manual handling risk, as well create noise that can adversely affect animal behaviour. Gates, fences can fall over etc if not properly maintained. Bailing twine is not suitable to hold cattle facilities together.
Unstable race or crush	PN	If they fall they can cause serious injuries especially if animals are present.
No floor in Crush	PN	Without a floor, animals can move or walk off with a crush, or cause it to tip over.
Damaged floor in crush	NOC	The floor needs to be maintained to prevent animals getting purchase on the

		ground beneath. Animals need a sure footing to remain calm.
Poorly designed facilities	IN/NOC	Good facilities are required along with a SS of W to ensure stock tasks can be carried out without risk of injury.
Livestock – Fields with Public Access		
Dairy bulls of recognised breeds are kept in fields with public access	PN/consider PR	AIS 17 specifies the recognised breeds but no dairy bull should be in a field with public access. This is long established.
Cows with calves at foot are grazed in fields with public access when there are fields available without public access	IN/NOC	Where reasonably practicable the herd should be managed to ensure potentially high-risk situations such as cows with young calves are not in fields with public access. Alternative controls should be in place if there are no other available fields
No signs at likely access points to fields to advise of beef bulls or cows with calves	NOC	Signs should be present.
Livestock – Field Work		
No arrangement in place to provide protection for workers in field e.g. suitably placed vehicle	NOC	A vehicle can provide separation or a refuge in case of difficulty with the animals.
No mobile handling facilities or SSW for stock tasks	IN/NOC	When separating animals especially calves, there should be adequate arrangements to ensure the mother or other elements of the herd cannot contact the handler.

Drowning and Asphyxiation		
WaGLL p12 – Lantra workbook p45		
Confined space entry is likely to take place but there is no RA	IN	If there is a risk assessment and the person who has carried out it out is not competent an IN would be suitable
Avoid working in a confined space	PN	If the task can be carried out without entry and no suitable precautions are in place
A professional contractor is not being used and in-house staff are entering the confined space who have not been adequately trained	PN	Entering confined spaces is a hazardous activity and should only be done so by persons who have been adequately trained and have the right equipment.
There is no SSW for those entering a confined space	PN	Entering confined spaces is a hazardous activity and a SSOW is required to ensure the safety of those undertaking the work
The RA or SSW does not identify suitable emergency arrangements	IN (PN if work being carried out at time)	Emergency arrangements should not rely solely on the emergency services
No or inadequate arrangements to ensure people stay out of buildings connected to the slurry storage system during mixing/pumping	IN/NOC	PN if people are inside a store with a slatted floor above slurry being stirred or agitated. Do not enter the building yourself
Indoor stirring point being used for slurry mixing/pumping	PN	If an indoor stirring point has to be used, air fed respirators will be required along with all other CS controls. Do not enter the building yourself

People standing over mixing points whilst mixing/pumping place	PN	The stirrer should be started, people then kept away from buildings and stirring points. After 30 mins can return (from up wind) to turn off stirrer and move away again for at least another 30 mins. Do not approach the stirring point yourself
The personal capabilities of each individual entering the CS have not been assessed	IN	PN if the work is being carried on at the time of the visit, or from talking to those entering the CS & medical issues are identified
No emergency plan or inadequate emergency plan	PN	If work is not going to be carried out within 21 days an IN may be considered
RA and SSW not provided to those entering	PN	If work is being carried out without a SSW or there is a SSW but those entering have not been adequately instructed and informed
Are detectors used where there is a risk of oxygen depletion or toxic gas	PN	Gas detectors are not suitable as a warning of slurry gas - concentrations of gas can rise very rapidly and unexpectedly. There will not be adequate time on alarm to get out of the area
If PPE and detectors are used and they aren't calibrated and tested	PN	

Children – see vehicles section for IEE's relating to children and vehicles

WaGLL p8 – Lantra workbook p36

Situation	IEE	Comment
Unsupervised children are present in the workplace	PN (PR)	Adequate supervision can only be achieved if those supervising are not engaged in any aspect of a work activity.
Children don't have a safe and secure play area away from the hazards of the farm	IN	It must be clearly understood and defined where home stops and work areas begin. Children must be provided with a safe and secure play area that adequately confines them to safe locations. (PN - If children can wander or are left to play in the workplace)
Children under the age of 13 riding or driving agricultural vehicles	PN	See the machinery /vehicles section of this table for more details.
Signs are present on the entry to the farm to warn that children may be present	NOC	Employees and visiting drivers etc. should be made aware that they must stop if they see a child on the farm and make sure the child has been returned to a safe area
Slurry lagoon not fenced	IN	Long established standard to prevent people (including children) falling into slurry.

Agricultural vehicles

WaGLL p3 – Lantra workbook p28

Situation	IEE	Comment
Safe stop Safe stop is not practiced and there are no alternative arrangements for preventing vehicle movement when the operator leaves the cab or maintenance activities are carried out with the machinery running.	IN HSWA S2 or S3	Leaving the vehicle operating position without applying the handbrake is a common cause of fatal incidents. IN for instruction and training, supervision Before leaving the driver's seat/operating position: • Engage handbrake • Controls in neutral • Switch off engine (or turn off power) • Remove key (or lock-off the power supply)
Safe stop Keys left in vehicles/self-propelled machines	NOC	Where there is a risk of use by unauthorised/untrained operators and children. Key security arrangements
Operating vehicles on slopes - no operator roll over protection	PN/PR	To prohibit the use of the vehicle where there is significant risk of roll over until a roll over protective structure and a restraining device have been fitted. PR especially if Tractor Cabs Regulations breached (Some vehicles will require specialist advice regarding suitability of ROPS)
Operating vehicles on steep slopes - only a roll bar or incomplete cab is fitted	IN	To require the fitting of a restraining device.
Operation of vehicle on steep slopes indicates lack of adequate training.	PN HSWA S2 or S3 PUWER Reg 9(1)	Where a driver is, or will shortly be expected to, have to drive on slopes where due to the slope or operations involved, overturning is possible.
Operation of vehicle on steep slopes indicates lack of adequate training.	IN HSWA S2 or S3 PUWER Reg 9(1)	As above but operations are not imminent.
Vehicle driven with open door or seat belt not worn.	NoC/IN HSWA S2 or S3	A seat belt acts as a restraint to reduce the level of injury to the driver during a collision or roll over. Many fatal injuries have been received on vehicles with adequate ROPS due to the driver not wearing the restraint provided. Open doors also increase the risk of injury during a roll over and allow higher noise levels inside cabs.

Poorly loaded vehicle.	NoC/IN WAH Reg 10	Consider the stability of products, overall weight and distribution, methods of retention, condition and suitability of the vehicle/trailer and restraints.
Reversing when RP to not do so.	NoC/IN HSWA S2 or S3 Workplace Reg 17	L24 ACoP: The need for vehicles with poor rear visibility to reverse should be eliminated as far as possible, for example by using one-way systems. Establishing turning circles can also promote compliance.
Child under 13 is a passenger in a tractor or self-propelled agricultural machine being used for agricultural work or which is travelling to or from such work.	PN/PR PACCAR Reg 3	Only passengers over 13 may ride in these vehicles in connection with agricultural work, and then only when restrained within a passenger seat.
Child under 13 is a passenger in a trailer and not riding on its floor or on the load with adequate means to prevent the child falling.	PN/PR PACCAR Reg 3 PUWER Reg 25	
Carrying passengers over 13 on mobile equipment without provision for carrying them safely.	PN/PR PUWER Reg 25	PN if adult passenger in tractor cab or similar vehicle without passenger seat as their presence reduces access to vehicle controls, decreases visibility and represents a hazard to the driver in the event of a collision or roll over. Consider PR if the risk of serious personal injury is probable, e.g. the passenger is on a trailer drawbar, tractor linkage, cab steps, forks/buckets of materials handling equipment or on a single seat ATV.
Person mounts or dismounts a moving vehicle	PN HSWA S2 or S3	
Lack of formal training and test/assessment for operators of telescopic handlers, lift trucks and ATVs.	IN PUWER Reg 9(1)	In the absence of formal training operators often cannot explain how to use load indicator chart on telescopic loader or the importance of correct tyre pressures and body positions when operating ATVs.
Head protection for ATV use not worn or provided.	PN/PR PPE Reg 4(1) or 4(2)	Consider PR if ATV being used as opposed to just being available.
ATV tyre pressures not checked.	IN PUWER Reg 6(2)(a)	An accurate low pressure gauge should be provided and the operator should know the pressure recommended by the manufacturer.
No pre-use check of ATV brakes and	IN	Brakes should give a safe straight stop. Brakes can have a relatively short life in

throttle.	PUWER Reg 6(2)(a)	the farming environment and need frequent cleaning, regular adjustment and proper maintenance. A throttle should operate smoothly in all steering positions.
Inadequate pedestrian safety.	IN Workplace Reg 17	Higher risk locations include around potato grading lines, materials handling areas such as produce and bale stacking/de-stacking and building and yard entrances. Consider Workplace Reg 8(1) if lighting is insufficient or unsuitable or PPE Reg 4(1) or 4(2) if high visibility clothing is absent but necessary.
Driver visibility is impaired due to excessively dirty windows and visibility aids.	NoC PUWER Reg 5(1)	
Broken or missing visibility aids on telescopic handlers and tractors towing large trailers.	PN PUWER Reg 28(e)	
Inadequate visibility aids or audible warning aids on any vehicle.	IN PUWER Reg 28(e) or 24(1)	Where foreseeable hazards exist which could be reduced by the fitting of such aids.
Significant corrosion or damage to a cab structure that acts as a ROPS.	IN PUWER Reg 5(1) Agriculture (Tractor Cabs) Reg 3(8)	Defects in the condition of the structure should be repaired and inspected by a competent person. Note: Repair or modification to structural components of a tractor safety cab (e.g. by welding or drilling holes) will immediately invalidate the original Test Approval if this results in a material change. Reg 3(8) An approved safety cab shall cease to be approved if it is materially changed as a result of damage, alteration, neglect or any other cause
Inadequate braking of any vehicle.	PN PUWER Reg 5(1)	

Machinery – Safe Use

WaGLL p5 – LANTRA Workbook p32

Situation	IEE	Comment
Operating inadequately guarded machinery: Machinery in use or where use is imminent has missing guards or is inadequately guarded	PR	Access to dangerous parts of machinery (rotating shafts, powered rollers, chain and sprocket drives, etc) where there is a foreseeability of coming into contact with the dangerous parts from the operating position or maintenance with the machine running is undertaken
Inadequately guarded machinery: Machinery likely to be used imminently	PN	Access to dangerous parts of machinery (rotating shafts, powered rollers, chain and sprocket drives, etc) where there is a foreseeability of coming into contact with the dangerous parts when the machine is running or being maintained
Inadequately guarded machinery: Machinery likely to be used in the next 3 – 6 weeks	IN	Access to dangerous parts of machinery (rotating shafts, powered rollers, chain and sprocket drives, etc) where there is a foreseeability of coming into contact with the dangerous parts from the operating position when the machine is used. IN for guards to be replaced/fitted/repaired.
Operating mobile PTO driven equipment – inadequate PTO or PIC guards	PN + PR	PTO shaft is inadequately guarded, and the machine is in use or is about to be used.
Operating mobile PTO driven equipment – inadequate PTO or PIC guards	PN	PTO shaft is not easily accessible e.g. close fitting linkage mounted sprayer.
Operating mobile PTO driven equipment – inadequate PTO or PIC guards	PN + PR	If damaged guard already reported to management and employee required to continue work (PR employer)
Suitability of work equipment – Use of unsuitable equipment for the task	PN	Where risk of risk of injury e.g. crushing / struck by falling objects. Examples include: Excavator buckets used for driving fence posts, bale spike used for lifting other than bales, telehandler/forklift used as a makeshift vehicle lift during maintenance.
Operator training – for self-propelled, trailed, stationary (e.g. grading lines, fleece and rope winding machines, grain dryers), or workshop machinery	IN	Where machine operator can be shown by lack of experience or accident, or by observed poor practice, to be in need of training. Understand operating instructions, know how to start and stop the machine safely and from the correct position, understand how to carry out safe stop and how to safely clear blockages. Training may be provided by the supplier (installation training), in-house, or for some equipment formal training is available (e.g. Lantra). Operators should have access to the instruction manual.
Area around fixed or stationary machines not adequately lit, not clean, tidy and free from obstruction.	IN/NOC	Workplace Regs 8,9 & 12

Machinery – Maintenance

WaGLL p5 – LANTRA Workbook p28

<http://www.hse.gov.uk/agriculture/topics/maintenance.htm>

Situation	IEE	Comment
Safe stop Safe stop is not practiced and maintenance is being carried out with the machine running or all power not isolated (including stored energy in springs/hydraulics/pneumatics))	PN/PR	Operator is seen intervening with a machine without performing safe stop (e.g. clearing a blockage). Risk of machine restarting when blockage is cleared (e.g. contra-rotating rollers on potato harvesters) or risk of other operators restarting machine during the maintenance intervention.
Safe stop Safe stop is not practiced and there are no alternative arrangements for preventing vehicle movement when the operator leaves the cab or maintenance activities are carried out with the machinery running.	IN	Where operator is seen leaving the vehicle operating position without applying the handbrake - lack of use or lack of general awareness of Safe Stop is established from discussion
Maintenance work under vehicle/machine cabs, bodies, access covers or trailers that are not adequately supported	PN	Maintenance under raised vehicle/machine bodies, trailers, etc., without using adequate jacks, chocks or supports so relying on machine hydraulics or pneumatics. Also use of inappropriate lifting equipment, e.g. forklift/telehandler to raise vehicle/machine being maintained. Risk of vehicle/machine falling or descending in an uncontrolled manner. WAH Reg 10(1)
No systems for isolating or marking machinery that is not safe to use, e.g. during maintenance if guards are removed	IN	Disable or electrically isolate electrical machinery, lock-off and warning notices attached.
Maintenance workshops – electrics, pressure systems, cutting, welding, lifting equipment and accessories, etc	In – NOC	Treat farm activities in the same way as any other factory or workshop if concerns are found. Follow general manufacturing welding enforcement position if inside or outside.

Machinery – Lifting

Situation	IEE	Comment
Equipment which lifts loads over or close to people, such as telescopic handlers, lift trucks and foreloaders on tractors, without adequate operator protection, or other people will be in close vicinity, has not been thoroughly examined at 12-month intervals.	IN LOLER Reg 9(3)(a)(ii)	If no one is at risk from failure of the lifting equipment, e.g. where there is operator protection and no other persons will be present, then a thorough examination may not be required. But this decision can only be justified after carrying out a suitable risk assessment. Machine would fall under PUWER, so must still be adequately maintained.
Other lifting equipment not thoroughly examined in the last 12 months, e.g. workshop hoist	NOC/IN	Note: LOLER does not apply to three-point linkages on tractors, bale elevators, grain augers or tipping trailers but all of these will need to be maintained under PUWER
Lifting accessories not thoroughly	IN	

examined every six months.	LOLER Reg 9(3)(a)(i)	
Equipment used to lift people not thoroughly examined every six months	IN LOLER Reg 9(3)(a)(i)	If item appears to be in poor condition, PN.
SWL clearly marked on lifting equipment and accessories	NOC/IN	And must not be exceeded

WORK AT HEIGHT, FALLS AND FALLING OBJECTS

Situation	IEE	Comment
Working on a roof or at height where it is reasonably practicable to carry out the work without working at height	IN/PN	Enforcement action will depend on the level of risk as to how quickly the work at height should cease.
Working on a roof or at height is taking place where control measures higher in the work at height hierarchy are not in place but are reasonably practicable to achieve. Includes unsuitable work equipment and if work is taking place from unsafe place, platform or surface.	IN/PN	The work at height hierarchy should be applied to the task to determine the safest reasonably practicable way of working safely at height. Ladders are near the bottom of the hierarchy and should not be accepted as a default option where other measures are safer and reasonably practicable. Where unsafe work at height practices are observed they should be prohibited.
Working on a roof or at height is taking place on or near to fragile materials and no means of preventing a fall through the fragile materials has been put in place. For example holes/opening, fragile surfaces have not been covered or protected to prevent a fall through or into or through.	PN/PR	Fragile materials should be treated as unprotected edges. Measures should be put in place to prevent or mitigate against falls. If no such measures are in place the inspector should prohibit any further work at height until such measures are in place
No perimeter edge protection and work is being carried out near an open edge.	PN	Any open edge from which a person could fall should be protected and if there is a risk of a fall of a distance likely to cause personal injury a PN should always be considered.
No toe boards or other measures in place to prevent tools or material falling from an open edge	PN	This will include platforms, scaffolding as well as other work areas at height.
No exclusion zone in place below a roof where work is taking place to protect those on the ground from tools or equipment that may fall through openings	IN/NOC	Measures should always be taking to prevent items falling but on the rare occasions where there is a risk tools can be dropped or can fall, an exclusion zone should be in place.
Purlins are walked	PN/PR	The work at height hierarchy must be adhered to and all RP measures taken to prevent or mitigate a fall.
Non-integrated man cages are used to lift people for routine tasks	NOC	A PN should be considered depending on the risk. Where work can be planned, more suitable equipment can be used.

Those erecting scaffolding or operating a MEWP have not been adequately trained	NOC/IN	
Access equipment is not inspected before use	NOC	
Lifting equipment (telehandlers, FLTs, man lifting cages, MEWPs, cherry pickers etc) that has not been thoroughly examined is used to lift persons	IN	If in poor condition PN
No risk assessment has been carried out for work at height activities that are taking place on site or have and will take place on site	IN	If unsafe work at height is witnessed then a PN may be appropriate
Fragile roof materials not adequately marked or if this is not reasonably practicable communicated to persons working in the vicinity in another way	IN	Fragile roof signs required at all likely access points to fragile surfaces. Even in glass houses signs should be displayed. Some glass is designed to be walked upon, other glass is not. The duty holder should make all fragile surfaces known.
Access to glasshouse roofs is not suitably controlled	PN	Where access is required to carry out cleaning, inspection or other work suitable measures should be in place to prevent falls. Any persons accessing glasshouse roofs should be properly trained and competent to do so.
Raising persons unsafely e.g. on forks of a lift truck or telehandler / bucket on excavator / in a potato box lifted on forks	PN / PR	Risk of serious personal injury from fall. Man cages designed and inspected in accordance with HSE guidance PM28 may be used for non-routine unplanned work. They should also be used with suitable equipment e.g. a suitable FLT, or a telehandler where the tilt, side shift, chassis or mast levelling functions must not be capable of operating whilst the lifting platform is elevated
Work at height access equipment or accessories (tower scaffolds, pedestals, pop-ups mini towers, ladders, ropes, walk lines, carabiners, harnesses etc) are in an unsafe condition	PN	If there is a risk of persons falling distance liable to cause serious personal injury from use of unsafe equipment then its use should be prohibited
Man lifting cage not constructed in line with PM28	PN	Man lifting cages must be constructed in line with PM28
Man lifting cage does not have a current thorough examination certificate	IN	IN unless the condition of the cage is unsafe for use in the opinion of the inspector in which case a PN can be issued.
Man riding basket being used on a telehandler that can lift higher than 6m	PN	Non-integrated platforms on telehandlers reaching above 6m should not be used. Alternative measures need to be taken to provide access to heights above 6m, such as integrated man riding baskets, or other suitable working platforms.
Man riding cage used for non-routine tasks with a telehandler with no or defective anti-tilt lock	PN	A anti-tilt lock must be fitted and must be working.
Worker riding on trailer with no means of preventing falls	IN /PN	Workers should not ride on trailers unless modified to transport people (sides, seats, access etc). Where workers do need to

		get access to the trailer to load or sort stock it should be done while the trailer is not moving.
Ladder or other access equipment in poor condition	PN	Ladders used on site should be “industrial class” and be in good condition. Poorly maintained ladders e.g. with missing feet, damaged rungs or stiles should not be used.

Bales and trailers		
Bale stacks not stacked on firm, dry and level ground	IN	If bales are not stacked on firm, dry level ground, it is foreseeable deterioration will occur. A PN should be served if the stack is unstable at the time.
If bale stacks are seen to be unstable	PN	
If stacks are not tied/interlocked or stepped back in line with INDG125	IN	A safe system of work will need to be in place until the IN is complied with to ensure persons aren't in the area. If this can't be achieved a PN should be served preventing access to the area until the bales have been restacked.
Bale stacks are constructed under OHPL's	IN	A PN may need to be considered to prevent work until OHPL's have been turned off if there is risk of contact.
Rider operated equipment being used without FOP's	PN	
Work is being carried out near the edges of stacks or trailer beds	NOC	PN should be served if the work is observed and there is an immediate risk in order to prevent a fall of a distance likely to cause personal injury
Bale stacks are regular inspected for signs of deterioration	IN/NOC	It is essential even stacks properly constructed in line with INDG125 are regularly inspected.
Those tasked with stacked or de-stacking bales have not received adequate information and instruction and there is no SSW	NOC/IN	Stacking is a skill and it essential there is a SSW and instructions on how to construct stacks and de-stack in line with INDG125
Bales transported on trailers are not secured	IN/NOC	If being carried out and there is a risk to persons or structures a PN would appropriate.
People not kept well out the way of any loading/unloading of bales	PN	Pedestrians should be excluded from areas where bales could fall during loading or unloading
Big bales are being moved by hand	PN	Big bales can weigh up to 600kg so as well as the risk of them falling onto people, they present a significant risk manual handling risk if they are being handled by hand.
Round bales are stacked on end	IN/NOC	Stacking on the ends can compromise the integrity of the stack. They should be stacked in their sides, chocked and as described in INDG125.
Round bale stacks are visibly unstable	PN	Persons should be prohibited from being near the stack and only lifting equipment with FOP's used to remedy the stack

ELECTRICITY - Overhead Power Lines (OHPLs)

WaGLL p9 – LANTRA workbook p41

GS6 Avoiding danger from overhead power lines <http://www.hse.gov.uk/pubns/g6.htm>
AIS8 Working safely near overhead electricity power lines <http://www.hse.gov.uk/pubns/ais8.htm>
Energy Networks Association guidance, leaflets including Look Out Look Up, and printable cab stickers from ENA website <http://www.energynetworks.org/electricity/she/overview.html>
Individual Distribution Network Operator (DNO) websites.

Situation	IEE	Comment
Location of OHPLs on farm not mapped and/or maximum working height/minimum clearance distances to be maintained are not known	IN/NOC	The dutyholder needs to know both the location and the maximum working height/minimum clearance to be maintained so this can be compared to the height/reach of machines and work planned to minimise the risk of contact. The location of OHPLs and maximum working height/reach can be marked on farm map. Dutyholder should contact their local Distribution Network Operator (DNO) for advice and help measuring OHPL actual heights or if they suspect OHPLs may be below the legal minimum, e.g. 5.2m for 11kV (see AIS8 and GS6 for other voltages) HWSA, MHSWR
No plan for minimising risk of contact with OHPLs	IN/NOC	Compare line heights/minimum clearances to maximum height/reach of farm machinery. Plans may include: Ensure there is enough clearance for these machines. Purchasing policies for machines. Planning activities to avoid approaching OHPLs (see list of activities below). Designated tipping, folding, stacking areas away from OHPLs. Planning planting to reduce risks during harvesting, e.g. leaving areas below OHPLs uncultivated, drilling row crops parallel to OHPLs, harvesting parallel to OHPLs to minimise passing under with high machinery. I, I & T for farm workers and measures to inform contractors and visiting drivers. HWSA, MHSWR Reg 3, 4 & 10,11, PUWER Reg 4, 8, & 9
Following activities carried out within 10m horizontal distance from OHPLs without additional advice from the DNO: - Stacking bales, fertiliser bags or potato boxes - Erecting temporary structures such as polytunnels - Folding sprayer booms - Tipping trailers or lorries with tipping bodies - Operating lift trucks or materials handlers	PN	These activities should be avoided within 10m horizontal distance. If they cannot be avoided the dutyholder will need to contact the DNO for advice, e.g. re-routing the line, temporarily making the line dead, or assessing the risks and agreeing a safe system of work with the DNO. This may involve physically limiting the height/reach of machines, the erection of barriers and goal posts, etc. to keep machinery at a safe height or a safe distance away. HWSA, EAWR 1989 Reg 4(3) and 14

- Working on top of combines or other high machinery - Moving or storing ladders, scaffold tubes or irrigation pipes - Tree work - Fencing		
Building up land beneath OHPL so minimum clearance is reduced to less than legal minimum (e.g. 5.2m 11kV)	PN	Prohibit work if ongoing. Prohibit use of high/variable reach machines, stacking materials, storage, etc in those areas until rectified. DNO will need to be contacted to raise OHPL height or re-route. HSWA, EAWR 1989 Reg 4(3) and 14
Use of a rain or slurry gun within 30m (greater distance in high winds)	PN	Position guns so that jets cannot contact the OHPL. Guns should travel parallel to the OHPL not below them. Check breaker devices (that interrupt the jet) are working because a continuous jet could conduct electricity.
Farm workers unaware of location of OHPLs, precautions to take, and action to take in the event of contact with an OHPL.	IN/NOC	Farm should have systems in place to ensure all farm workers, contractors (e.g. hedge trimming, harvesting, spraying), and visiting drivers (e.g. feed or aggregate tipping lorries have information on the location of OHPLs and farm precautions. DNOs will provide cab stickers for free or dutyholders can print their own from the ENA website. HSWA, PUWER Reg 8 & 9, MHSWR Reg 10 & 11
No signage indicating presence of OHPLs or prohibiting high risk activities (e.g. tipping)	IN/NOC	Part of the farms wider control measures already covered above.

Electricity – Electrical Systems and Portable Equipment

WaGLL p21 – LANTRA workbook p42

<http://www.hse.gov.uk/electricity/index.htm>

<http://www.hse.gov.uk/electricity/information/agriculture.htm>

Situation	IEE	Comment
Poorly designed or badly maintained fixed electrical systems	PN/IN	Fixed systems should be properly designed. Consumer units, switches, wiring, sockets and plugs all in good condition. There should be no 'daisy chaining' of extension leads or over use of adaptors. Expectation should be no different to other industries and if it looks wrong it probably is. EAWR 1989 Reg.4(1)
Fixed systems not inspected	NOC	Inspection and testing by a competent electrician. HSE guidance gives no recommended interval. BS7671 IET Wiring Regulations 18 th Edition recommends maximum period of 3 years for agricultural and horticultural settings. LANTRA workbook recommends testing by a qualified at least every 5 years. EAWR 1989 4(2)
Power cables to fixed machines not adequate. Covers to electrical	NOC/IN	Power to machines should be in armoured cable or installed in conduit with a good earth connection. Emergency cut off switched close

equipment open.		to all fixed machines. Keep all covers closed. EAWR 1989 Reg 4(1), 6, 7
No RCD on sockets used outdoors or in damp/corrosive atmospheres, or where they can be reached by steam or water jets. Unsuitable (domestic) type sockets in use in these areas.	PN/IN	RCDs should also be tested regularly using the 'test' button. EAWR 1989 4(1) and 6
Poorly maintained portable equipment, e.g. cracked housings, damaged cables exposing inner wires/conductors, cable glands/chord grips pulled out, broken plugs	PN/NOC IN for maintenance, inspection, testing regime.	PN if immediate risk e.g. in use and exposed live conductors or risk of ingress water. IN for maintenance/inspection/testing regime. Users should undertake brief visual checks of portable appliances before use with more formal visual inspection and combined inspection and test by a competent person at frequency determined by type of equipment and environment it is used in. Suggested frequency in HSG107, e.g. heavy industrial/high risk of damage areas there should be weekly formal inspection and inspection and test at 6-12 month intervals. http://www.hse.gov.uk/pubns/priced/hsg107.pdf EAWR 1989 Reg 4(2)
Domestic 240v tools used outdoors without RCD	PN/IN	Electrical tools used outdoors or where there is a lot of earthed metalwork should be reduced voltage (110v) or connected through an RCD. Suggest using alternatives, e.g. air or battery tools. EAWR 1989 Reg 4(1)
Pressure Washer used without RCD	PN/IN	EAWR 1989 4(1) & 6. Do you use a steam/water pressure cleaner? http://www.hse.gov.uk/pubns/indg68.pdf and <i>Electrical risks from steam/water pressure cleaners Guidance Note PM29</i> http://www.hse.gov.uk/pubns/priced/pm29.pdf

ASBESTOS

WaGLL p13

Situation	IEE	Comment
No Asbestos Management Plan	IN	Farms should have an up to date Asbestos Management Plan. Sector can provide an example plan to include with any Notice or NOC.
ACM's not clearly marked	NOC/IN	Asbestos warning signs required to be in situ
Absence of contractor arrangements to communicate management plan and location of ACM's	NOC/IN	Contractors should be provided with the asbestos management plan and adequate information to allow them to plan and safely carry out work
Poor condition and no action taken	IN/PR	ACMs obviously deteriorating and no plans or action to control/contain/manage

MUSCULO-SKELETAL DISORDERS

WaGLLp14

Situation	IEE	Comment
Based on the level of risk it is reasonably practicable for hazardous manual handling / repetitive tasks to be eliminated.	IN	Hazardous manual handling / repetitive tasks that pose a risk of serious personal injury can often be eliminated through automation (such as using conveyor belts, use of mechanical means etc.).
A suitable and sufficient risk assessment has not been carried out to determine the level of risk from any hazardous manual handling / repetitive tasks which cannot be eliminated	IN	Where hazardous manual handling / repetitive tasks cannot be eliminated a risk assessment should be carried out to determine the level of risk and identify any further risk control measures. The assessment should assess the task, individual carrying out the task, the load, and the environment. The risk assessment may be a simple MAC assessment or it may need to be a full risk assessment which fully considered those elements set out in Schedule 1 of MHOR
Based on the level of risk it is reasonably practicable for hazardous manual handling / repetitive tasks to be reduced through provision of mechanical aids	IN	Manual handling / repetitive tasks can often be reduced through provision of mechanical aids (such as provision of trolleys, lifting tables etc.)
Based on the level of risk it is reasonably practicable to improve the ergonomic design of the work station / area to reduce the risk from hazardous manual handling / repetitive tasks	IN	The design of the work station (e.g. at potting stations) can often be improved to reduce periods of poor body posture e.g. repetition of upper body movement, bending, twisting etc.
Job rotation, rest breaks are specified in the risk assessment as a control measure but in practice they are not happening on the shop floor	IN	Job rotation / frequent short breaks are reasonably practicable ways of reducing the risk from hazardous repetitive tasks. If significant risk can be reduced through job rotation / rest breaks and it is a control measure that is specified in the risk assessment then it is for the company to ensure that it is implemented.
Where hazardous manual handling / repetitive tasks cannot be eliminated and have been reduced as far as reasonably practicable, it is still important that those exposed to the residual risk from hazardous manual handling / repetitive tasks have received adequate training in how to carry out manual handling and safe use of any equipment that they are expected to use	IN	Provision of manual handling training should not be a first option. Elimination assessment and reduction should be considered first. Training should be relevant to the tasks which the individual is required to perform and should cover: manual handling risk factors and how injuries occur, safe manual handling techniques, systems of work for the tasks, use of mechanical aids, practical work to allow trainer to identify and remedy poor technique.

WELFARE (ZOO NOSES)

WaGLL p16

Situation	IEE	Comment
------------------	------------	----------------

Failure to provide suitable and sufficient toilets.	IN	Toilets to the standard and number set out in the ACOP (see Appendix 1) should be provided at static farm sites. However, Reg 20 (provision of toilets) applies to farming away from the farmyard (ie a field) SFAIRP. If farming equipment can be taken to the field, then so should welfare provisions if the activity will last for any amount of time that it is likely that employees will need welfare provision.
Toilets are provided but they are not up to standard e.g. not clean, do not have lockable doors etc	NOC / IN	Toilets (even those provided for work away from the farm) should be clean, well-ventilated, well lit, toilets with a lockable door (cabins are preferable but chemical toilets are acceptable). If welfare provision is provided there is no reason that it cannot be kept clean. If the farm is failing to ensure that toilets are kept clean, a cleaning rota may be needed.
Failure to provide washing facilities to the level required by the regulations	IN	Washing facilities to the standard and number set out in the ACOP (see Appendix 1) should be provided at static farm sites. However, Reg 21 (provision of washing facilities) applies to farming away from the farmyard SFAIRP. If farming equipment can be taken to the field, then so should welfare provisions if the activity will last for any amount of time that it is likely that employees will need welfare provision. Where it is reasonably practicable to provide washing facilities, at least cold running water, soap, towels, and basins large enough to wash forearms should be provided
Washing facilities on the premises do not meet the standard specified in the regulations	IN	Wash basins with hot and cold (or warm) running water, soap and towels (or a hand dryer) – basins should be large enough to wash forearms
Failure to provide drinking water	IN	Reg 22 (provision of drinking water) applies to farming away from the farmyard SFAIRP. Adequate supply of drinking water can be provided. It is reasonably practicable to take sufficient supply of bottled water for employees required to work away in the fields etc If shared supply of drinking water is provided then cups should also be provided.

CHAINSAWS

WaGLL p19

Situation	IEE	Comment
Absence of formal training and assessment for operating a chainsaw	PN	PUWER ACoP requires appropriate training and either a relevant certificate of

on or inside trees, including cross cut work on fallen branches.	PUWER Reg 9(1)	competence or a national qualification to assess whether training was understood. Various courses and qualifications are available, see SIM 01/2004/02 . Note – Important exception If the chainsaw use is done as part of agricultural operations, such as hedging, clearing fallen branches or pruning trees to maintain clearance for machines, and the operator first used a chainsaw before 05/12/98, see row below.
Absence of formal training for chainsaw use as part of agricultural operations where the operator first used a chainsaw before 05/12/98.	PN PUWER Reg 9(1)	A certificate of competence or a national qualification is not mandatory in these specific circumstances, but the operator must still be adequately trained. Such training should include the dangers from the chainsaw, the task, the necessary controls and relevant legal requirements.
Absence of training for other chainsaw work (cutting firewood, furniture, pallets etc).	PN PUWER Reg 9(1)	A certificate of competence or a national qualification is not mandatory for these tasks, but the operator must still be adequately trained. Such training should include the dangers from the chainsaw, the task, the necessary controls and relevant legal requirements.
No chainsaw refresher/update training or frequency of such training exceeds guidance.	NoC/IN PUWER Reg 9(1)	The view of industry, training providers and sector is that in order for a chainsaw operator's training to be adequate, refresher/update training should be undertaken at regular intervals: • Occasional users every 2-3 years • Full time users every 5 years IN for refresher/update training, in addition to other enforcement, is appropriate if there is evidence of unsafe work.
Tree felling within two tree lengths of OHPLs or branch removal within 10 metres of OHPLs.	PN/PR EAW Reg 4(3)	Such work should only be done by professional arborists, typically utility arboricultural contractors, which have liaised with and notified the Network Operator (or are working for them) and are operating in accordance with their specialist advice and guidance.
Presence of persons other than chainsaw operator within two tree lengths of tree being felled.	PN/PR WAH Reg 10(2)	This describes felling whereby the chainsaw operator stands on the ground and fells the entire tree without reducing its height first. Persons may be within two tree lengths if a tree is sectionally felled (i.e. sections are cut off one at a time by an operator inside a MEWP or climbing with ropes), but persons on the ground still need to remain outside of any danger zone to prevent injury from falling arisings and equipment.

Defects with or absent chain brake, chain catcher or front & rear hand guards.	PN PUWER Reg's 5(1) or 11(1)	See Page 7 of INDG317 for illustration of these controls.
Defects with or absent anti-vibration mounts.	IN VAW Reg 6(1)	Machine to be repaired or replaced.
Defects with or absent silencer.	NoC NAW Reg 6(1)	Machine to be repaired or replaced.
Inadequately tensioned chain.	NoC PUWER Reg 5(1)	There should be no visible sagging of the chain under the bottom of the bar.
Absence of or badly damaged helmet, chainsaw trousers, chainsaw boots, hearing protection or eye protection for all types of chainsaw work.	PN PPE Reg 4 or Reg 7	See http://www.hse.gov.uk/treework/safety-topics/chainppe.htm for details of specifications. Helmets provide some protection against kickback to the head which is why they are still required for chainsaw work even where there is no risk from falling objects.
No gloves worn for certain tasks or they are badly damaged.	NoC PPE Reg 4 or Reg 7	Type of glove will depend on a RA of the task and the machine, considering the need for protection from chainsaw contact, thorny material, cold/wet conditions and where relevant, to assist with rope climbing.

Occupational Lung Disease

WaGLL p15

Note: The health consequences of occupational lung disease are serious in the EMM

Situation	IEE	Comment
Not wearing RPE where there is evidence that significant dust is generated no mechanical means of protecting the operator	IN	Provide extraction or ventilation where possible. If not reasonably practicable to provide, RPE with a minimum APF of 20 eg. FFP3
Evidence of significant dust generation and vehicles being used with windows down or cab not fitted with suitable ventilation and not wearing RPE.	IN	Vehicles fitted with suitable ventilation and adequately maintained will prevent significant exposure to dusts where processes are generating dust (e.g. straw chopping). RPE with a minimum APF of 20 eg. FFP3 where significant dust is generated and worker outside of protected cab

Significant welding in buildings with no mechanical means of dust extraction	IN	Welding in agriculture is frequently of short duration or in the open air. However, some farms may have a dedicated workshop and do a significant amount of fabrication. Must meet recently published general welding enforcement standards
Cleaning and removal of residual dust or dry manure using hand- held stiff brushes, flails or compressed air. Not wearing RPE with a minimum APF of 20 eg. FFP3.	IN	Very high levels of dust expected. Not using wet cleaning techniques, such as, damping down or wet mopping or not using a vacuum cleaner and not wearing RPE with a minimum APF of 20 eg. FFP3 where significant dust is generated.
RPE not maintained or no face fit test for tight fitting masks	IN	Incorrectly fitted or maintained RPE will not provide the protection required.
Health surveillance absent and the dust controls are not fully effective, resulting in a possible risk of occupational asthma and COPD	IN	Discuss with Occupational Health

Noise

WaGLL p17

HSE guidance on noise: <http://www.hse.gov.uk/pubns/indg362.pdf>

Situation	IEE	Comments
Exposure is likely to exceed the upper exposure action value (LEP,d of 85 dB) and it is reasonably practicable to reduce the exposure by organisational and/or technical measures	IN	Noise Regulations r.6(2) Require a programme of work to reduce exposures to ALARP
Exposure is likely to exceed the lower exposure action value (LEP,d of 80 dB) but be below upper exposure action value (LEP,d of 85 dB) and it is reasonably practicable to eliminate or reduce the risk, e.g. by changing the work process	NOC	Noise Regulations r.6(1) Require the necessary changes
Exposure is above the exposure limit value (LEP,d of 87 dB).		Consider whether exposure is ALARP – if not see item 1. If personal hearing protection has not been supplied, see item 5. If personal hearing protection has been supplied but is not being fully and properly used, see item 6. See also item 13 and 14
Exposure is likely to exceed the upper exposure action value (LEP,d of 85 dB) and no hearing protection	IN	Noise Regulations r.7(2), 7(4) Require provision of suitable hearing protection

provided or hearing protection is not suitable		Consider prosecution See also item 13 and 14
Exposure is likely to exceed the lower exposure action value (LEP,d of 80 dB) but be below upper exposure action value (LEP,d of 85 dB), and no personal hearing protection is provided	NOC/IN	IN if workers have requested hearing protection and it has not been provided. Noise Regulations r.7(1), 7(4) Require personal hearing protection is supplied to employees who request it Consider whether breach originates from a failure to provide information instruction and training on availability of hearing protection, see item 11.
Personal hearing protection is not being fully or properly used where it has been supplied under r.7(2).	IN	Noise Regulations r.8(1)(a) Require full and proper use of personal hearing protection Consider whether breach originates from a failure to provide information, instruction and training on use etc. of hearing protection, see item 11, and the need for hearing protection zones, see item 7. Consider prosecution
Hearing protection zones (HPZ) are not designated or adequately signed, i.e. in areas of the workplace where work is going on during which particular employees must use hearing protection (r.7(2)) or areas of the workplace where the upper exposure action values would be likely to be exceeded if personnel spent a significant portion of their working day within them	NOC	Noise Regulations r.7(3) Require clearly marked hearing protection zones and management of access Improvement Notice if of the opinion that lack of HPZ is likely to lead to unprotected daily noise exposure above upper exposure action value, but consider whether action under r.7(2) or r.8(1), see items 4 and 6, is (more) appropriate.
The use of personal hearing protection within designated hearing protection zones (HPZ) is not being observed and/or access to zones is not restricted where practicable.	IN	Noise Regulations r.7(3) (likely also that action under r.7(2) or r.8(1) is appropriate, see items 4 and 6) Require that access to HPZ is restricted and no employee enters zone unless wearing personal hearing protectors
Noise control equipment provided (e.g. enclosures, silencers) is not fully and properly used and/or is not adequately maintained; Personal hearing protection provided is not adequately maintained.	IN	Noise Regulations r.8(1) Require full and proper use and/or maintenance of noise control equipment provided, and maintenance of hearing protection provided, as relevant Consider whether breach of failure to use noise control equipment originates from a failure to provide relevant information, instruction and training, see item 11. Consider prosecution where risk gap is extreme, i.e. exposure likely to exceed 85 dB.
Exposure frequently is likely to exceed the upper exposure action value (LEP,d of 85 dB), or employees are otherwise at risk, and; (i) there is no health surveillance, or health surveillance systems inadequate; or (ii) the employer is failing to act on	IN	Noise Regulations r.9(1) or 9(4) Require a suitable system of health surveillance or require appropriate action in the event of identifiable hearing damage Consider whether breach originates from a failure to provide information, instruction and training on noise risks/health surveillance (e.g. employees not attending

the results.		appointments), see item 11. Inspectors are advised to consult an Occupational Health Inspector if considering enforcement action under 9(1) where the adequacy of health surveillance is the issue, or under r.9(4)
Exposure is likely to exceed the lower exposure action value (LEP,d of 80 dB) and employees have not been provided with suitable and sufficient information, instruction and training.	NOC/IN	IN if lack of information, instruction and training is implicated in breaches of r.7(1), 8(1) or 9, see items 5, 6, 9 and 10) Noise Regulations r.10 Require suitable and sufficient information, instruction and training
Exposure appears significant (for rough guide on when RA required see below). No risk assessment or risk assessment is not suitable and sufficient and employer taking no action	IN	Noise Regulations r.5 It will usually be appropriate also to enforce other regs within the Noise Regulations.
Transient site. Exposure is likely to exceed the upper exposure action value (LEP,d of 85 dB) and no personal hearing protection is provided.	PN	Noise Regulations r.7(2)
Exposure is above the exposure limit value (LEP,d of 87 dB, LCpeak of 140 dB), dutyholder cannot supply personal hearing protection for immediate control of risk, and work likely to continue under these conditions unless inspector intervenes.	PN	Noise Regulations r.6(4) Inspectors are advised to consult a Noise & Vibration Specialist Inspector if considering issuing a Prohibition Notice in this situation

Rough Guide on Risk Assessment

As a rough guide, it is likely that the upper exposure action value (LEP,d of 85 dB) will be exceeded if:

- You have to raise your voice to talk to someone about 2 m away and employees are exposed to the noise for most of the working day;
- You have to raise your voice to talk to someone about 1 m away and employees are exposed to the noise for more than two hours;

VULNERABLE WORKERS		
Situation	IEE	Comment
No current Landlord Gas Safety Record for gas appliances which have been provided by the farm to the worker as part of the living accommodation (building or caravan)	IN	Gas appliances provided by the farmer to workers with the caravan or accommodation should be checked by a competent and registered gas engineer every 12 months. A copy of the certificate should be given to the tenant within 28 days. The farmer (landlord) should retain copies of previous LGSCs for 2 years.
No means to raise the alarm in the event of a fire	IN	May need to consult with the fire authorities if there is a serious risk. The site should have some means to alert those in the accommodation
No means to fight small fires e.g. extinguisher	NOC / IN	Fire extinguishers or a hose may be required depending on the risk
Worker sleeping accommodation is not set away from main farm activities	NOC / IN	Temporary accommodation such as caravans should be sited away from the main farm activity

Caravans should be properly spaced as a control measure in the event of fire	NOC / IN	Adequate space between caravans: a minimum 6 m separation is recommended
--	----------	--

PESTICIDES

Many aspects of pesticide storage and use are subject to requirements under legislation specific to plant protection products, not the Health and Safety at Work Act. You may not have the appropriate Warrant to take action. If during the visit you identify any issues regarding storage or use of pesticides, you should contact Paul Cooper or Adrian Hodgkinson (Agriculture Sector) or an NPET Inspector for advice on how to proceed.

5.3 Follow up evaluation inspections of 2018/2019 ACE premises

Introduction
During 2018/2019 four regions were selected to run HSE's Agriculture Compliance Events (ACEs) and the follow up inspections in support of the events. These regions were the South West, Eastern England, Mid and north Wales and the central belt of Scotland. Inspections were carried out in Q4, targeting the ACE topics as the principal causes of fatal and serious injuries in agriculture. More details of the 2018/2019 ACE inspection programme can be found in Agriculture Sector Work Plan 2018-19: Inspection of farms growing fresh produce, Inspection of Forestry sites and Inspection in conjunction with Agriculture Compliance Events. During this work year follow up evaluation inspections (see Targeting and Intelligence documentation from DST) will be made to premises visited during Q4 of 2018/2019. These visits will take place in Q4 with the same proportional split between ACE attendees/non-attendees. The sector will provide FOD with a list of premises in the South West, Eastern England, mid to North Wales and the central belt of Scotland that were visited in the 2018/2019 ACE inspection programme. The list will include sufficient sites to identify a suitable number of visits and will detail which farms attended and which farms did not attend the ACE. FOD are asked to carry out evaluation visits to farms in each of the four regions. Inspection visits should be carried out between January and March 2020. The split of visits between attendees and non-attendees should be the same as the 2018/2019 visits.
Background
For many years HSE ran agricultural safety and health awareness days (SHADs) as a way of raising the awareness of safety and health issues amongst hard to reach farmers. Last year we changed to a model where a series of regional events were linked to inspection activity targeted at promoting sustained compliance with long established legal duties and standards and thereby drive up standards on farms. While these new events will continue this year, there will be a small number of revisits to promises that were included in last year's programme to help evaluate whether the ACE programme and supporting inspections provide a mechanism for sustained compliance.
Timing
FOD Inspection activity will take place January to March 2020
Recording and Reporting
Follow the arrangements in the main body of the OG. Use Coin Inspection Type 'AGCOMP' to distinguish visits from those completed under the fresh produce programme.
Health and safety
Inspectors should follow 'HSE guidance for inspectors when visiting farms' and HSE guidance on biosecurity practices when visiting farms. It is essential that exemplary standards of bio security are followed to avoid reputational risk to HSE in the event of alleged disease transmission.
Inspection
Inspection will concentrate on the main causes of fatal accidents (which were covered at the events in 2018/2019. Farmers that attended an agriculture compliance event received a leaflet ('What a Good Farm Looks Like') containing simple statements of what a farm complying with health and safety legislation looks like in terms of management of safety and health risks to help them understand what they can do and should have in place. Any MPMC and MEC encountered should be addressed (OC18/12)

Enforcement expectations Inspectors should consider those issues set out below in the Priorities section where relevant at each visit. Initial Enforcement Expectations for some commonly identified issues are set out in this OG under IEE for inspections following ACE (above).
Priorities Ensure farmers, including the self-employed, understand and manage the H&S risks associated with running their farm: Are they complying with long standing legal requirements and understand why these are important to prevent injury and ill health? Where relevant concentrate on: ○ Child Safety (e.g. not on the farm, not on machines, provided with safe play areas and if going onto the farm properly (fully) supervised at all times) ○ Transport and machinery safety (including ROPS, Seat belt use, ATVs (helmets- training and maintenance), Safe Stop, Guarding of PTO shafts; machinery maintenance and statutory examination, safe site, driver behaviour etc) ○ Cattle (handling, protection of the public on rights of way, facilities including crushes) ○ Falls from height, something collapsing and falling objects e.g. bale stacking, working on fragile roofs, access equipment, ladders ○ Overhead power lines (OHPL's) and electrical systems ○ Entry or accidental entry into confined spaces or slurry lagoons Additionally, inspector may wish to look at any of the following when encountered ○ Manual handling ○ Design and maintenance of pesticide stores ○ Training – including use of chainsaws ○ Duty to manage, and control work with, asbestos ○ Respiratory hazards – dust, fume Take effective enforcement action to secure compliance with matters giving rise to significant risk of injury and ill health. The Sector has access to considerable accident and ill health history. Farms should not be treated any differently than any other workplace.
Guidance Farmwise
Contacts Agriculture Sector – Health, Engagement, Livestock & Pesticides Team Adrian Hodkinson – Sector Principal Inspector - 020 3028 2683 Nick Sangha – Sector point of contact for the events - 020 3028 1745 Agriculture – Forestry, Arboriculture and Agricultural Machinery Team Andrew Turner – Sector Principal Inspector – 020 3028 2755 Luke Messenger – Agricultural Machinery – 020 3028 1739

5.3.1 IEE for follow up evaluation inspections of 2018/2019 ACE premises

See 5.2.1 (IEE for inspections following Agriculture Compliance Events) for initial Enforcement Expectations for the follow-up evaluation inspections.

5.4 General references for inspecting in the agriculture sector

General

[Agriculture microsite](#)

[Farmwise](#)

[Overhead power lines](#)

[Working at height](#)

[Child and public safety](#)

[Workplace safety and welfare](#)

[Manual Handling in Agriculture webpages](#)

Machinery

[Working safely with agricultural machinery](#)

[Using tractors safely](#)

[Machinery - safe use](#)

[Power take-offs and power take-off shafts](#)

[Operator restraints for tractors and mobile work equipment](#)

Livestock

[Livestock](#)

[Managing slurry on farms](#)