

Agriculture Sector Work Plan 2021/22: Inspection of farms in conjunction with Agriculture Compliance Events - Follow-up evaluation inspection of 2019/2020 ACE visits

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.

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Inspection programme

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 2021/22 inspection programme will comprise of:

- 1) A programme of inspection combined with a series of compliance events (Agriculture Compliance Events, ACE), developed as a result of research into farmers attitudes to risk, and to bring about a change in behaviours and the management of risk.
- 2) Follow up evaluation inspections to a small number of farms visited as part of the ACE inspections in 2019/2020.

What is the extent of the problem?

Agriculture has around 1% of the GB workforce but 20% of reported work-related fatalities. It therefore remains a priority in the HSE work plan.

Agriculture’s fatal injury rate is 6 times greater than construction and 18 times greater than the all industry average.

The main causes of death have remained unchanged for many years, they are:

- Workplace transport;
- Falling objects;
- Falls from height;
- Machinery, maintenance on moving equipment
- Livestock handling

The precautions necessary to prevent death and serious injury in these areas are well known and guidance widely available.

The latest fatal injuries report for agriculture can be found at <https://www.hse.gov.uk/agriculture/resources/fatal.htm>

In addition, the agriculture industry has a very poor record for non-fatal injury and occupational ill health. 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:

- 1.3 million people are suffering from some form of occupational disease because of working in agriculture.
- 500,000 of these are musculoskeletal disorders (MSD's) while occupational lung disease (OLD) is the second most common form of occupational ill-health.
- 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.

What must be covered at the inspections?

Appendices to this Operational Guidance (OG) describe the specific issues to be addressed during inspection. In addition, it is proposed that briefings will be offered to those FOD units involved in the Agriculture Compliance Event inspections during this work year.

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

What sectors and topics are we inspecting and when?

Sector	Topics	When
Inspection following Agriculture Compliance Events (ACE)	Topics will match the areas covered by the ACE <ul style="list-style-type: none"> • Work at height and falling objects • Workplace transport and machinery • Cattle handling • Electricity • Children on farms • Drowning and asphyxiation 	<ul style="list-style-type: none"> • Q3 and Q4
Follow-up evaluation inspection of Agriculture Compliance Events (ACE) 2019/2020 premises	Topics will match the areas covered by the ACE <ul style="list-style-type: none"> • Work at height and falling objects • Workplace transport and machinery • Cattle handling • Electricity • Children on farms • Drowning and asphyxiation 	<ul style="list-style-type: none"> • Q3 and Q4

Further information on targeting of premises including SIC codes is given in the targeting and inspection guide on the [FOD sharepoint site](#).

Application of the Enforcement Management Model (EMM)

Guidance is provided on application of the Enforcement Management Model for topics in each of the above work streams. The [IEE tables](#) are not intended to cover every scenario but are intended to give an overview of enforcement standards for relevant topic areas e.g. work at height, vehicles etc.

Sector support available

Relevant Sector Inspector	Topic lead
Wayne Owen – 07771 667015	Agriculture Team Leader
Stephen Britton – 07884 476446	Livestock safety (including public rights of way). Zoonoses and Animal Visitor Attractions. MSDs. Agricultural Buildings (including DTM asbestos). H&S at agriculture shows. Confined Spaces including slurry and slurry gases. DSEAR and fire safety. Ammonium nitrate (notification and storage). Biosecurity.
Eve Macready-Jones – 07788 566804 Or Christopher Maher – 07825 273401	Agricultural Transport. General Agricultural Machinery Safety. Tractor Cab approvals. Pre-harvest machinery and sprayer standards. Whole body vibration (agricultural machines). LOLER and telehandlers. Workplace transport. Overhead power lines. Landscaping.
Kathy Gostick – 07717 498653 Or Christopher Maher – 07825 273401	Forestry. Arboriculture. Aquaculture. Gamekeeping.
Paul Cooper – 07917 078785	Pesticides/biocides. Liaison and oversight of NPET arrangements. Work at Height (except tree work). Bale safety. Occupational Lung Disease in agriculture and horticulture. COSHH. Production horticulture. Vets and Veterinary medicines. Sheep dipping. College engagement. Stress. Mental Health. Child safety

The above support and guidance will be supplemented by in-year webinars for those inspectors carrying out follow up inspections for the Agriculture Compliance Events.

Recording of inspections

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

Sector	DO IT risk area
Inspection following agriculture compliance events	Plant & Equipment; Workplace Transport; Work at Height Inspection type 'AGCOMP'
Follow up evaluation inspections to 2019/2020 ACE premises	Plant & Equipment; Workplace Transport; Work at Height Inspection type 'EVALUATION'

Inspectors are also encouraged to share with the Agriculture Sector any issues of note (e.g. particular instances of 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 appropriate control measures present, used, checked and maintained?
- 3) What are the immediate control measure failings? E.g. Lack of guarding,
- 4) What are the management failings (systems, information, instruction, training, etc.)?
- 5) What level of enforcement taken was 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

Health and safety

Inspectors should follow [HSE guidance for inspectors when visiting farms](#) and [HSE guidance on biosecurity practices when visiting farms](#). You should be disinfecting your boots before and after any agriculture or forestry visit and check if the farm is in a restricted area using [APHA Map](#). It is essential that exemplary standards of biosecurity are followed to avoid reputational risk to HSE in the event of alleged disease transmission.

Appendix 1 - Inspection in support of Agriculture Compliance Events

Introduction

Four regions have been selected to run HSE's Agriculture Compliance Event (ACEs) training during the 2021/22 work year. These events, delivered to farmers, will be linked directly to inspection activity within the same area - see table below. The inspection activity will begin approximately two months after the ACE training. Unlike the face-to-face events delivered in previous years, this year the ACE training will be delivered online through an e-learning package.

Regions selected to run agriculture compliance training are:

Midlands	Oxfordshire, Bedfordshire, Hertfordshire and Buckinghamshire
South Wales	Various locations
Scotland	Tayside
North West	Cumbria, Lancashire

ACE online training will be offered to farmers in those areas in August 2021.

HSE has contracted Lantra to organise and deliver this training. The focus will be on the practical steps that farms can take to ensure compliance ahead of the programme of inspection visits which will take place mid Q3 to early Q4. The term ACE is not being used externally. Instead they are invited to undertake training to help them prepare for an inspection.

The Sector will provide FOD with four lists (one for each region) of farm premises after the ACE training has taken place. The list will detail which farms registered and completed the e-learning course and which farms did not take up the offer of the HSE funded training.

FOD are asked to carry out visits to farms in each of the four regions. Details of numbers of visits will appear in the FOD Targeting and Inspection Guide. Inspection visits should be carried out from November 2021 to January 2022 for each of the 4 regions.

Agriculture Sector is offering webinar based briefing sessions in Q2 (June / July) for FOD inspectors carrying out the Q3/Q4 inspections. These sessions will also cover enforcement expectations.

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.

In 2018 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. The approach uses behavioural insights to improve and deliver sustained compliance.

We use the intelligence gained each year to improve our approach and aim to use peer support group events to help with regulatory assurance.

Timing

FOD Inspection activity will take place November 2021 to January 2022.

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 other agricultural work programmes.

Health and safety

Inspectors should follow [HSE guidance for inspectors when visiting farms](#) and [HSE guidance on biosecurity practices when visiting farms](#). You should be disinfecting your boots before and after any agriculture or forestry visit and checking if the farm is in a restricted area using [APHA Map](#). It is

essential that exemplary standards of biosecurity 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 in the agricultural e-learning training) and ill health. Even if farmers do not choose to take the training, the HSE leaflet '[What a Good Farm Looks Like](#)' is available free of charge online. The leaflet contains simple statements of what a farm complying with health and safety legislation looks like in terms of management of safety and health risks. There is no excuse for poor practice on site and risks are well known.

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

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.

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 – Main message, children shouldn't be in the active workplace
 - Young children: safe play areas and fully supervised if on the farm
 - Older children: trained and fully supervised only undertaking low risk activities in a controlled way
- Transport and machinery safety
 - Safe farm layout
 - ROPS (cabs and bars)
 - Seat belt use
 - Competence for using tractors, telehandlers, ATVs
 - ATVs (helmets, training and maintenance)
 - Safe Stop and machinery isolation
 - Power Take Off (PTO) shaft guarding
 - Maintenance and LOLER examination
- Cattle
 - Handling and housing (workers segregated from animals during high risk work)
 - Race and crush
 - Public rights of way
- Falls from height
 - Work on fragile roofs / gutters
 - Falling objects – bales, potato boxes, stored machinery and equipment
- Overhead power lines (OHPLs)
 - Maps (location know and communicated to workers and contractors)
 - Use of appropriate vehicles and equipment
 - Storage (not under OHPLs)
 - Traffic routes and control
 - Control of contractors
- Electrical supplies
 - Tested and maintained
- Confined Spaces – grain stores and slurry lagoons

- Fencing
- Contractors used for confined space work

Additionally, inspector may wish to look at any of the following when encountered

- OLD risk i.e. Lung disorders –dust, fume, slurry,
- Manual handling risk
- Pesticide stores - design and maintenance of
- Training – including chainsaws and ATVs
- Asbestos - Duty to manage, and control work

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. Due to lone working incidents on farms often have worse outcomes than other industries; consider dutyholder factors in applying EMM.

Guidance

[Farmwise](#)
[What a Good Farm Looks Like](#)

Contacts		
Relevant Sector Inspector		Topic lead
Wayne Owen	07771 667015	Agriculture Team Leader
Stephen Britton	07884 476446	Livestock safety (including public rights of way). Zoonoses and Animal Visitor Attractions. MSDs. Agricultural Buildings (including DTM asbestos). H&S at agriculture shows. Confined Spaces including slurry and slurry gases. DSEAR and fire safety. Ammonium nitrate (notification and storage). Biosecurity.
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Chris Maher	0782 5273401	Arboriculture and Agricultural Machinery

Appendix 2 - Evaluation inspections of 2019/20 ACE premises

Introduction

In 2019/2020 four regions were selected to run HSE's Agriculture Compliance Events (ACEs) and the follow up inspections in support of the events were carried out in 2019. These four regions were Yorkshire & North East, South East, Midlands and Scotland (borders).

During this work year (21-22) FOD are asked to revisit some of the farms inspected in previous years to determine whether there has been any sustained improvement.

The sector will provide FOD with a list of premises in Yorkshire & North East, South East, Midlands and Scotland (borders) that were visited in the 2019/2020 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 ACEs.

FOD are asked to carry out visits to farms in each of the four regions. Inspection visits should be carried out between January and March 2022. Details of visit numbers and selection will appear in the FOD Targeting and Inspection Guide.

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.

In 2018 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 by e-learning delivery, there will be a small number of revisits to premises that were visited in previous 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 2022.

Recording and Reporting

Follow the arrangements in the main body of the OG. Use Coin Inspection Type '**EVALUATION**' to distinguish these ACE evaluation visits from other farming visits taking place this year.

Health and safety

Inspectors should follow [HSE guidance for inspectors when visiting farms](#) and [HSE guidance on biosecurity practices when visiting farms](#). You should be disinfecting your boots before and after any agriculture or forestry visit and checking if the farm is in a restricted area using [APHA Map](#). 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 agricultural compliance session) and ill health. Even if farmers do not choose to take the training, the HSE leaflet '[What a Good Farm Looks Like](#)' is available free of charge online. The leaflet contains simple statements of what a farm complying with health and safety legislation looks like in terms of management of safety and health risks. There is no excuse for poor practice on site and risks are well known.

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

Enforcement expectations

Inspectors should consider those issues set out below in the Priorities section where relevant at each visit. [Initial Enforcement Expectations](#) are set out later in this document.

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 – Main message, children shouldn't be in the active workplace
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- Overhead power lines (OHPLs)
 - Maps (location know and communicated to workers and contractors)
 - Use of appropriate vehicles and equipment
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 - Traffic routes and control
 - Control of contractors
- Electrical supplies
 - Tested and maintained
- Confined Spaces – grain stores and slurry lagoons
 - Fencing
 - Contractors used for confined space work

Additionally, inspector may wish to look at any of the following when encountered

- OLD risk i.e. Lung disorders –dust, fume, slurry,
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Appendix 3 – Initial Enforcement Expectation tables for commonly seen issues in agriculture

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.

In the following tables references are given on where to find additional guidance on each topic in

- the HSE publication [What a Good Farm Looks Like](#) (WaGFL),
- the Lantra training package,
- the relevant link to the HSE website.

LIVESTOCK – HOUSING AND HANDLING CATTLE		
<ul style="list-style-type: none"> • WaGFL p10 • https://www.hse.gov.uk/agriculture/topics/livestock.htm • AIS 35 Handling and housing cattle <p>Scotland's Rural College (SRUC) Design standards</p> <ul style="list-style-type: none"> • TN 565 - Recommendations for the design of new, safe and efficient cattle handling systems <p>Humane Slaughter Association Guidance</p> <ul style="list-style-type: none"> • Design-specifications-handling-facilities-for-abattoirs-and-farms <p>Advice on calving is available from HSE Northern Ireland:</p> <ul style="list-style-type: none"> • Animal Safety During Calving • Safety Around Calving Time Stop and Think Safe 		
Situation	IEE	Comment
Stock tasks are carried out on unrestrained animals	IN	Working on unrestrained animals presents a foreseeable and significant risk. If being carried out at the time a PN should be considered.
Doors/gates in the race are operated from within the race	IN	Persons should not be mixed in with animals moving through a race. There should be segregation, and this is best achieved by the handlers being outside the race. Gates etc. 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	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	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	PN	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	AIS 35 gives the standard and requirements.
Gates or facilities not well maintained, difficult to move	IN	Poorly maintained facilities can present a risk that animals will escape, increase manual handling risk, and make noise that can alarm the cattle. Gates, fences can fall over etc if not properly maintained. Bailer twine is not suitable to hold cattle facilities together.
Unstable race or crush	IN	If they fall then they can cause serious injuries especially if animals are present. Consider PN for imminent use.
No floor in Crush, and unsecured	IN	Without a floor, animals can move or walk off with a crush, or cause it to tip over. Consider PN for imminent use.
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	Good facilities are required along with a SSOW to ensure stock tasks can be carried out without risk of injury.

LIVESTOCK – FIELDS WITH PUBLIC ACCESS

- [AIS 17ew Cattle and public access in England and Wales](#)
- [AIS 17s Cattle and public access in Scotland](#)
- [Livestock On Public Rights Of Way: Country Land and Business Association GN03-09](#)
- [Signage Guidance for Outdoor Access: A guide to Good Practice.](#)
- [Countryside walking with your dog PDSA.](#)
- [Rights of way and accessing land. .GOV guidance](#)
- [The Countryside Code.](#)
- British Standard BS ISO 3864-1:2011 Graphical symbols. Safety colours and safety signs. Design principles for safety signs and safety markings
- [Health & Safety \(Safety Signs and Signals\) Regulations 1996 L64](#)
- [Traffic Signs Manual](#)

Dairy bulls of recognised breeds are kept in fields with public access	PN and consider PR	AIS 17 specifies the recognised breeds and no dairy bull should be in a field with public access. This is long established guidance.
Cows with calves at foot are grazed in fields with public access when there are fields available without public access	IN	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.

Livestock – field work

No suitable vehicle, or other effective means of escaping attack, used in field when carrying out tasks on stock	NOC	The vehicle is a refuge.
No mobile handling facilities or SSW for stock tasks	IN	When separating animals especially calves, there should be adequate arrangements to ensure the mother or other animals in the herd cannot contact the handler.

Confined spaces asphyxiation and drowning

- WaGFL p12
- <https://www.hse.gov.uk/agriculture/topics/welfare.htm#confined>
- <https://www.hse.gov.uk/coshh/basics/permits.htm>
- [Confined Space ACOP L101](#)
- [Confined Spaces a brief guide to working safely INDG258](#)
- [Managing slurry on farms - AIS9](#)
- [Managing confined spaces on farms - AIS26](#)

Third Party guidance that may be useful:

- HSA Agriculture guidance on confined spaces [Full guidance](#)
- HSE Northern Ireland [Slurry mixing guidance](#)

No or inadequate arrangements to ensure people stay out of livestock buildings connected to the slurry storage system during mixing/pumping	IN	Consider PN if people are inside a store with a slatted floor above slurry being stirred or agitated. Do not enter the building yourself
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
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 SSOW for those entering a confined space	PN	If work is not going to be carried out within 21 days an IN may be considered
The RA or SSOW does not identify suitable RPE, and equipment to enable entry and emergency rescue	IN (PN if work being carried out at time)	Emergency arrangements should not rely solely on the emergency services
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 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
RA and SSW not provided to those entering	PN	If work is being carried out without a safe system of work (SSW) or there is a SSW but it

		those entering have not been adequately instructed and informed
Gas detectors used as only protection where there is a risk of oxygen depletion or toxic gas	PN	Gas detectors are not suitable for preventing exposure to slurry gas. Gas can be released from pockets in the slurry unexpectedly and not in a uniform way. 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

- WaGFLL p8
- <https://www.hse.gov.uk/agriculture/topics/children.htm>
- [The Prevention of Accidents to Children in Agriculture Regulations 1998](#)

Situation	IEE	Comment
Unsupervised young children are present in the workplace	PN	Adequate supervision of young children 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	If children can wander or are left to play in the workplace. 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	See the machinery /vehicles section of this table for more details.
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	NOC	This can be achieved by signs at the entry to the farm to warn that children may be present
Slurry lagoon not fenced	IN	Long established standard to prevent people (including children) falling into slurry.

Children on Vehicles

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 and consider PR PACCAR Reg 3	Absolute duty. Consider PR.
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 and consider PR PACCAR Reg 3 PUWER Reg 25	https://www.hse.gov.uk/pubns/ais36.pdf

Carrying passengers over 13 on mobile equipment without provision for carrying them safely.	PN and consider PR PUWER Reg 25	PN if adult passenger in tractor cab or similar vehicle without seat and seat belt. 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 for higher risk, e.g. the passenger is on the outside of a vehicle, trailer drawbar, tractor linkage, cab steps, forks/buckets of materials handling equipment or on a single seat ATV.
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Agricultural vehicles

- WaGLL p3
- <https://www.hse.gov.uk/agriculture/topics/machinery/farm-vehicles.htm>
- [FOD workplace transport guidance](#)
- [Construction guidance on traffic management](#)

Situation	IEE	Comment
Safe site Inadequate pedestrian safety.	IN Workplace Reg 17	L24 ACoP safe segregation measures to focus on higher risk locations: <ul style="list-style-type: none"> • potato grading lines, • bale stacks and materials handling areas • building and yard entrances. <p>Lighting: Consider Workplace Reg 8(1) if lighting is insufficient or unsuitable or</p> <p>PPE Reg 4(1) or 4(2) if high visibility clothing is absent but necessary.</p>
Reversing when RP to not do so.	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.
LPG bulk store, or diesel tank no vehicle protection	IN	Notice to ensure vehicle protection is established.

Safe operator Lack of formal training and test/assessment for operators of telescopic handlers, lift trucks and ATVs.	IN PUWER Reg 9(1)	Assess competence of operators: 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.
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General Vehicle Issues		
Vehicle driven with open door or seat belt not worn.	IN HSWA S2 or S3	IN for replacing door or seatbelt inoperable. IN to establish arrangements for information, instruction to use seatbelts for operations with risk of rollover. Using tractors safely A step-by-step guide INDG185
ROPS cab structure corroded or damaged.	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 RR251
Driver visibility reduced: dirty windows and mirrors, cameras.	NoC PUWER Reg 5(1)	
Driver visibility reduced: Broken or missing mirrors and visibility aids on telescopic handlers and tractors towing large trailers.	PN PUWER Reg 28(e)	Consider IN for cracked mirrors that are still largely complete
Inadequate visibility aids or audible warning aids on any vehicle.	IN PUWER Reg 28(e) or 24(1)	For telehandlers use guidance: Safe Use of Telehandlers - Plant safety group
Inadequate braking of any vehicle.	PN PUWER Reg 5(1)	Hydraulic lines on trailers should be attached and operation should move brake parts.
Vehicle driven with open door or seat belt not worn.	IN HSWA S2 or S3	IN for replacing door or seatbelt inoperable. IN to establish arrangements for information, instruction to use seatbelts for operations with risk of rollover.

Poorly loaded vehicle.	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.
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ATV quadbikes		Safe use of all-terrain vehicles (ATVs) AIS 33
Head protection for ATV use not worn or provided.	IN PN/PR PPE Reg 4(1) or 4(2)	IN for provision IN to IN to establish instruction, training, and supervision PN and 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 (3-5psi) should be provided and 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. (dealer servicing is usually every 6 months) Thethrottle should operate smoothly in all steering positions.
Lack of formal training and test/assessment for operators of telescopic handlers, lift trucks and ATVs.	IN PUWER Reg 9(1)	Assess competence of operators: In the absence of formal training operators often cannot explain how importance of correct tyre pressures and body positions when operating ATVs.

Machinery – Safe use		
<ul style="list-style-type: none"> • WaGFL p5 • http://www.hse.gov.uk/agriculture/topics/machinery.htm 		
Situation	IEE	Comment
Machinery with missing / inadequate guards when: <ul style="list-style-type: none"> • Machinery in use • Use is imminent 	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

		Especially machinery that is used in one place, grain driers, saws et
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 Especially machinery that is used in one place, grain driers, saws etc
Inadequately guarded machinery: Machinery likely to be used in the next 3 – 6 weeks	IN	Access to dangerous parts of machinery IN for guards to be replaced/fitted/repaired.
Operating mobile PTO driven equipment – inadequate PTO or PIC guards	PN and consider 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 eg close fitting linkage mounted sprayer.
Operating mobile PTO driven equipment – inadequate PTO or PIC guards	PN and consider 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: <ul style="list-style-type: none"> • 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 to include: <ul style="list-style-type: none"> • Understand operating instructions, • safe start and stop the machine safely and from the correct position, • safe isolation and 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	Workplace Regs 8,9 & 12

Machinery - Maintenance

- WaGFLL p5
- <http://www.hse.gov.uk/agriculture/topics/maintenance.htm>
- [PUWER Approved code of practice L22](#)

Situation	IEE	Comment
<p>Safe isolation</p> <p>Operator is seen intervening with a machine without carrying out safe stop and isolation (e.g. clearing a blockage).</p>	<p>PN and consider PR</p>	<p>Risk of machine restarting when blockage is cleared (e.g. contra-rotating rollers on potato harvesters)</p> <p>or risk of other operators restarting machine during the maintenance intervention.</p> <p>Safe stop and isolation of trailed equipment needs to be considered (including stored energy in springs/hydraulics/pneumatics))</p>
<p>Safe stop</p> <p>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.</p>	<p>IN</p>	<p>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</p>
<p>Maintenance work under vehicle/machine cabs, bodies, access covers or trailers that are not adequately supported</p>	<p>PN</p>	<p>Risk of vehicle/machine falling or descending in an uncontrolled manner. WAH Reg 10(1)</p> <p>Maintenance under raised vehicle/machine bodies, trailers, etc., without using designed equipment to support the load (axle stands etc and pins.)</p> <p>Also use of inappropriate lifting equipment, e.g. forklift/telehandler to raise vehicle/machine being maintained.</p>
<p>No systems for isolating or marking machinery that is not safe to use, e.g. during maintenance if guards are removed</p>	<p>IN</p>	<p>Disable or electrically isolate electrical machinery, lock-off and warning notices attached.</p>
<p>Maintenance workshops – electrics, pressure systems, cutting, welding, lifting equipment and accessories, etc</p>		<p>Treat as any other industry, e.g. MVR</p>

LOLER And Lifting

- WaGFLL p5
- <https://www.hse.gov.uk/agriculture/topics/maintenance-4.htm>

Situation	IEE	Comment
Equipment which lifts loads over or close to people, such as telescopic handlers, lift trucks and fore end loaders 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	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 not clearly marked on lifting equipment and accessories	NOC	

Work at height, falls and falling objects

- WaGFLL p6
- <https://www.hse.gov.uk/agriculture/topics/falls.htm>
- <https://www.hse.gov.uk/work-at-height/index.htm>
- [FOD inspection guidance for working at height](#)
- [Working at Height a Brief Guide indg401](#)
- [Health and Safety in Roofwork 5th edition 2020 HSG 33](#)
- [Fragile roofs Safe working practices GEIS5](#)
- [Safe use of ladders and stepladders INDG 455](#)

Situation	IEE	Comment
<p>Working on a roof or at height where it is reasonably practicable to carry out the work without working at height</p> <p>E.g. low-level filling options for diesel tanks</p>	IN	Enforcement action will depend on the level of risk as to how quickly the work at height should cease.
<p>Fixed access equipment</p> <p>diesel tanks, silos etc. rather than leaning ladders.</p> <p>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.</p> <p>Includes unsuitable work equipment and if work is taking place from unsafe place, platform or surface.</p>	IN	<p>The work at height hierarchy should be applied to the task to determine the safest reasonably practicable way of working safely at height.</p> <p>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.</p> <p>Where unsafe work at height practices are observed they should be prohibited.</p>
<p>Fragile roof / skylights</p> <p>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.</p> <p>For example, holes/opening, fragile surfaces have not been covered or protected to prevent a fall through or into or through.</p> <p>Or walking on roof above support purlins with no additional equipment</p>	PN and consider PR	<p>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</p> <p>Guidance is available Fragile roofs Safe working practices GEIS5</p>

No perimeter edge protection and work is being carried out near an open edge.	PN and consider PR	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.
Ladder or other access equipment in poor condition	PN	Use guidance in Safe use of ladders and stepladders INDG 455
Falling objects No exclusion zone under and around work area where there is a risk of objects falling.	PN	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.
Those erecting scaffolding or operating a MEWP have not been adequately trained	IN	
Access equipment is not inspected before use	NOC	
Lifting equipment and accessories not thoroughly examined to lift persons (telehandlers, FLTs, man lifting cages, MEWPs, cherry pickers etc)	IN	If in poor condition PN
RA and SSOW for work at height activities that are taking place on site or have and will take place on site	IN	
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.

Lifting platforms

- [PM28 Working platforms \(non-integrated\) on forklift trucks](#)

Non-integrated man cages are used to lift people for routine tasks	NOC	An IN should be considered depending on the risk. Where work can be planned, more suitable equipment can be used.
Raising persons unsafely e.g. on forks of a lift truck or telehandler / bucket on excavator / in a potato box lifted on forks	PN and consider 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 to any standard	PN	Man lifting cages must be constructed in line with PM28
Man lifting cage does not have a current thorough examination certificate	IN	IN If corroded damaged and considered dangerous PN
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 with a telehandler with no or defective anti-tilt lock	PN	An anti-tilt lock must be fitted and must be working.
Worker riding on trailer with no means of preventing falls	PN	Workers should not ride on trailers without a means to prevent falls. 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.

Bales and falling objects

- WaGFLL p7
- <https://www.hse.gov.uk/agriculture/topics/falls.htm#bales>
- [Safe working with bales in agriculture - INDG125](#)
- [Opening hay, haylage and silage bales – AG6](#)
- [Safe use of big round balers - AIS4](#)
- [HSE website - maintenance of plant and equipment](#)
- [Working safely with agricultural machinery - INDG241](#)

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 OHPLs	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 FOPS	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	NOC	Even stacks properly constructed in line with INDG125 should be regularly inspected.
Those tasked with stacking or de-stacking bales have not received adequate information and instruction and there is no SSW	IN	Stacking is a skill and it essential there is a Safe System of Work and instructions on how to construct stacks and de-stack in line with INDG125
Bales transported on trailers are not secured	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	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 FOPS used to remedy the stack

Electricity - Overhead Power Lines (Ohpls)

WaGLL p9 – LANTRA workbook p40

[GS6 Avoiding danger from overhead power lines](#)

[AIS8 Working safely near overhead electricity power lines](#)

[Energy Networks Association guidance, leaflets including Look Out Look Up, and printable cab stickers from ENA website](#)

Situation	IEE	Comment
<p>Location of OHPLs on farm not mapped and/or maximum working height/minimum clearance distances to be maintained are not known</p>	<p>IN</p>	<p>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)</p> <p>HSWA, MHSWR</p>
<p>No plan for minimising risk of contact with OHPLs</p>	<p>IN</p>	<p>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 such as:-</p> <p>Designated tipping, folding, storage, stacking areas away from OHPLs. Designated routes for tall/high reach vehicles (possibly with combination of signage and goalposts). 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.</p> <p>I, I & T for farm workers and measures to inform contractors and visiting drivers.</p> <p>HSWA, MHSWR Reg 3,4,5,8 10 & 11, PUWER Reg 4,8 & 9, EAWR 4(3) & 14</p>
<p>Following activities carried out within 10m horizontal distance from OHPLs without additional advice from the DNO:</p> <ul style="list-style-type: none"> • Stacking bales, fertiliser bags or potato boxes • Erecting temporary structures such as polytunnels • Folding sprayer booms 	<p>PN</p>	<p>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.</p> <p>HSWA, EAWR 1989 Reg 4(3) and 14</p>

<ul style="list-style-type: none"> • Tipping trailers or lorries with tipping bodies • Operating lift trucks or materials handlers • Working on top of combines or other high machinery • Moving or storing ladders, scaffold tubes or irrigation pipes • Tree work • Fencing • Assemble/dismantle boom irrigation sprayers 		<p>N.B. If work near OHPL is required to comply with enforcement notices, e.g. removal of stacks from below OHPL this will need to be carefully planned and controlled with advice from the DNO.</p>
<p>Building up land beneath OHPL so minimum clearance is reduced to less than legal minimum (e.g. 5.2m 11kV)</p>	<p>PN</p>	<p>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.</p> <p>HSWA, EAWR 1989 Reg 4(3) and 14</p>
<p>Use of a rain or slurry gun within 30m (greater distance in high winds)</p>	<p>PN</p>	<p>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.</p>
<p>Farm workers unaware of location of OHPLs, precautions to take, and action to take in the event of contact with an OHPL.</p>	<p>IN</p>	<p>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.</p> <p>DNOs will provide cab stickers for free or dutyholders can print their own from the ENA website.</p> <p>HSWA, PUWER Reg 8 & 9, MHSWR Reg 10 & 11</p>
<p>No signage indicating presence of OHPLs or prohibiting high risk activities (e.g. tipping)</p>	<p>IN</p>	<p>Part of the farms wider control measures already covered above.</p>

Electricity – Electrical systems and portable equipment

- WaGFLL p21
- <https://www.hse.gov.uk/agriculture/topics/electricity.htm>
- [INDG231 \(rev1\) Electrical Safety and you.](#)
- [INDG236 \(rev3\) Maintaining portable electric equipment in low-risk environments](#)
- [HSG107 \(Third edition\) Maintaining portable electrical equipment](#)
- [HSR25 \(Third edition\) The Electricity at Work Regulations 1989 Guidance on Regulations Guidance Note](#)
- [PM29 Electrical risks from steam/water pressure cleaners](#)
- [INDG68 Do you use a steam/water pressure cleaner?](#)

Situation	IEE	Comment
Poorly designed or badly maintained fixed electrical systems that are dangerous	PN	Fixed systems should be properly designed. Consumer units, switches, wiring, sockets and plugs all in good condition. 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 person at least every 5 years. EAWR 1989 4(2)
Power cables to fixed machines not adequate. Covers to electrical equipment open.	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
Sockets used outdoors and / or damp/corrosive atmospheres, or where they can be reached by steam or water jets. Ingress protected (IP) plugs should be in use with RCD protection	PN	RCDs should also be tested regularly using the 'test' button. EAWR 1989 4(1) and 6
Portable equipment damaged, e.g. cracked housings, damaged cables exposing inner wires/conductors, cable glands/chord grips pulled out, broken plugs	PN	PN if immediate risk e.g. in use and exposed live conductors or risk of ingress water. IN for maintenance/inspection/testing regime.

		<p>Users should undertake brief visual checks.</p> <p>PAT (portable appliance testing) to follow guidance. http://www.hse.gov.uk/pubns/priced/hsg107.pdf</p> <p>EAWR 1989 Reg 4(2)</p>
Domestic 240v tools used outdoors without RCD	PN	<p>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.</p> <p>EAWR 1989 Reg 4(1)</p>
Pressure Washer used without IP rated plug and RCD	PN	<p>EAWR 1989 4(1) & 6.</p> <p>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</p>

Electricity – Underground cables

- [HSG47 Avoiding danger from underground services](#)
- [ENA leaflet 'Watch out Cables About'](#)

Situation	IEE	Comment
Excavation (or other ground penetration) being undertaken where buried cables are likely to be present but no plans, cable location or safe digging practices undertaken.	PN	<p>Unless the landowner can be certain that no cables have been buried in the past they should assume they could be present. Buried cables are more likely near farm buildings, sub-stations or other fixed electrical equipment, at termination of overhead power lines, and any other places where cables can be seen emerging from the ground. The dutyholder can ask the DNO for location plans (free service). A trained and competent person should locate cables using cable detection techniques (CAT/Genny). Safe digging techniques used where cables are present.</p> <p>EAWR 1989 Reg 4(3) and 14. If construction work also CDM 2015 Reg 25(4)</p>

Asbestos

- WaGFL p13
- <https://www.hse.gov.uk/asbestos/>
- [L143 Managing and working with asbestos Control of Asbestos Regulations 2012. Approved Code of Practice and guidance](#)

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.
ACMs not clearly marked	IN	Asbestos warning signs required to be in situ
Absence of contractor arrangements to communicate management plan and location of ACM's	IN	Contractors should be provided with the asbestos management plan and adequate information to allow them to plan and safely carry out work
ACMs in poor condition and no action taken	IN	ACMs obviously deteriorating and no plans or action to control/contain/manage

Musculoskeletal disorders

WaGFL p14

- <https://www.hse.gov.uk/agriculture/topics/manual-handling.htm>
- [Manual Handling at work: Getting help with manual handling](#)
- [MAC Tool](#)
- [Assessment of Repetitive Tasks \(ART\) tool](#)
- [Upper Limb Disorder Risk Assessment Worksheets](#) for more detail than the ART
- [Risk Assessment for Pushing and Pulling RAPP](#)

Situation	IEE	Comment
Hazardous manual handling / repetitive tasks could 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.).
No risk assessment	IN	The risk assessment should assess the task, the individual, the load, and the environment. The risk assessment may be a simple MAC or ART assessment or it may need to be a full risk assessment which fully considered those elements set out in Schedule 1 of MHOR
Mechanical aids are reasonably practicable	IN	Manual handling / repetitive tasks can often be reduced through provision of mechanical aids (such as provision of trolleys, lifting tables etc.)

Ergonomic design of the work station would be reasonably practicable	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.
Information instruction and training to staff carrying out handling using SSOW including handling equipment.	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 (Zoonoses)

- WaGFL p16
- <https://www.hse.gov.uk/agriculture/topics/zoonoses.htm>
- <https://www.hse.gov.uk/coshh/industry/agriculture.htm>
- [L24 Workplace health, safety and welfare. Workplace \(Health, Safety and Welfare\) Regulations 1992. Approved Code of Practice and guidance](#)
- [INDG 293 Guidance for employers on welfare provisions](#)

Situation	IEE	Comment
Failure to provide suitable and sufficient toilets.	IN	Toilets to the standard and number set out in L24 (see Appendix 1) should be provided at static farm sites. However Reg 20 (provision of toilets) applies to farming away from the farmyard (e.g. 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. Construction guidance is useful: https://www.hse.gov.uk/construction/healthrisk/welfare/toilets-and-washing.htm
Toilets are provided but they are not up to standard e.g. not clean, do not have lockable doors etc	IN	Enforcement to establish suitable arrangements for cleaning and maintenance.
Failure to provide washing facilities to the level required by the regulations	IN	Static farm site – follow L24 (see Appendix 1).

		<p>Construction guidance is useful: https://www.hse.gov.uk/construction/healthrisks/welfare/toilets-and-washing.htm</p> <p>Washing hands and forearms prior to eating is a high priority for agriculture due to additional risks from zoonoses.</p> <p>If the activity will last for any amount of time that it is likely that employees will need welfare provision.</p>
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		
<ul style="list-style-type: none"> • WaGFLL p19 • https://www.hse.gov.uk/agriculture/forestry.htm • INDG 317 Chainsaws at work • http://www.hse.gov.uk/treework/safety-topics/chainppe.htm 		
Situation	IEE	Comment
Absence of formal training and assessment for operating a chainsaw on or inside trees, including cross cut work on fallen branches.	PN PUWER Reg 9(1)	<p>PUWER ACoP requires appropriate training and either a relevant certificate of competence or a national qualification to assess whether training was understood. Various courses and qualifications are available, see SIM 01/2004/02.</p> <p>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.</p>
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, <u>but the operator must still be adequately trained</u> . 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 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: <ul style="list-style-type: none"> • 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 without required controls and competencies in place.	PN and consider 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 should under normal circumstances not be allowed.	PN and consider 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

- WaGFL p15
- <https://www.hse.gov.uk/asthma/agriculture.htm>
- <https://www.hse.gov.uk/coshh/industry/agriculture.htm>
- <https://www.hse.gov.uk/dust/index.htm>
- <https://www.hse.gov.uk/welding/index.htm>
- [HSG129 Health and safety in engineering workshops](#)

Situation	IEE	Comment
Welding in buildings with no mechanical means of fume extraction.	IN	Welding in agriculture is frequently of short duration or in the open air. Some farms may have a dedicated workshop and do a significant amount of fabrication. Follow general industry guidance, particularly mindful that all steel is considered a carcinogen (2020).
High dust area, no extraction and no RPE	IN	RPE with a minimum APF of 20 e.g. FFP3
High dust area, Vehicle Cabs with no ventilation no 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 e.g. FFP3 where significant dust is generated.

Cleaning no vacuum or wet cleaning and no RPE: E.g. stiff brushes, flails or compressed air.	IN	Methods should consider: 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	Consider guidance: https://www.hse.gov.uk/health-surveillance/index.htm Discuss with Occupational Health

Noise		
WaGFL p17 https://www.hse.gov.uk/agriculture/topics/noise.htm https://www.hse.gov.uk/noise/index.htm https://www.hse.gov.uk/noise/calculator.htm		
Situation	IEE	Comments
Exposure is above the exposure limit value (LEP,d of 87 dB). OR Exposure is likely to exceed the upper exposure action value (LEP,d of 85 dB) No reduction measures in place,	IN	Noise Regulations Require a programme of work to reduce exposures to ALARP Consider: <ul style="list-style-type: none"> • On vehicle noise – tractor / telehandler cabs, quadbikes, skid steer etc. • Fixed equipment – workshops, Animal feeding HPZs as for other operations. • Portable tool use Consider daily and weekly exposures. https://www.hse.gov.uk/noise/calculator.htm Potential solutions are described in construction guidance: https://www.hse.gov.uk/construction/healthrisks/physical-ill-health-risks/noise.htm
Rough guide on noise risk assessment		
It is likely that the upper exposure action value (LEP,d of 85 dB) will be exceeded if: <ul style="list-style-type: none"> • 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

- <https://www.hse.gov.uk/vulnerable-workers/index.htm>
- <https://www.hse.gov.uk/gas/landlords/index.htm>
- [Guidance on provision of caravan accommodation for temporary workers in the UK \(Fresh Produce Org\)](#)

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.
Worker sleeping accommodation is not set away from main farm activities	IN	Temporary accommodation such as caravans should be sited away from the main farm activity
No means to fight small fires e.g. extinguisher	IN	Fire extinguishers or a hose may be required depending on the risk
Worker sleeping accommodation is not set away from main farm activities	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	IN	Adequate space between caravans: a minimum 6 m separation is recommended

Pesticides and material storage

WaGFLL p18

<https://www.hse.gov.uk/agriculture/topics/pesticides.htm>

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 (Agriculture Sector) or an NPET Inspector for advice on how to proceed.

However some aspects of other materials stored in or near to the pesticides can be dealt with as detailed below.

Pesticides found outside of locked store	IN	Enforce under COSHH for safe storage
Stores have incompatible materials in or around them e.g. Flammable liquids and LPG stored with pesticides	IN	<p>Enforcement under DSEAR. Using RGP for the materials:</p> <p>LPG storage and associated pipework (e.g. underground pipework; security of store and proximity of vehicles) HSE LPG topic, LPGA codes of practice</p> <p>Flammable liquids and solids, diesel, petrol etc</p> <ul style="list-style-type: none"> • HSG51 The storage of flammable liquids in containers,

		<ul style="list-style-type: none">• Guidance for the Storage of Intermediate Bulk Containers,• HSG71 Chemical warehousing: The storage of packaged dangerous substances• INDG 230 Storing and Handling Ammonium Nitrate
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