

Ceres Rural – Health & Safety Bulletin

Introduction

Welcome to Ceres Rural's Health & Safety Bulletin. Each quarter, we update you on industry news, topical issues, and safety alerts with the aim of supporting you in achieving best practice on your farm or estate. This edition considers the implications for rural businesses of the Personal Protective Equipment at Work (Amendment) Regulations 2022. We outline some of the safety measures that can be taken in the coming months when silaging, grain carting and working with bales, before concluding with a reminder of the importance of reviewing health and safety policies and giving an update on Government guidance regarding living with Covid-19.



Personal Protective Equipment at Work (Amendment) Regulations 2022

On 6th April 2022 the Personal Protective Equipment at Work (Amendment) Regulations (PPER) 2022 came into force. They amend the 1992 Regulations and extend employers' duties regarding PPE to limb (b) workers.

In the UK, Section 230(3) of the Employment Rights Act 1996 defines a worker in two ways:

- Limb (a) describes those with a contract of employment, this group of employees are already within the scope of the PPER 1992.
- Limb (b) describes workers who generally have a more casual employment relationship and work under a contract for service, they do not currently come under the scope of the PPER 1992.

Generally, workers who come under limb (b) carry out casual or irregular work for one or more organisations. As every employment relationship is specific to the individual and employer, the precise status of any worker can ultimately only be determined by a court of tribunal, but it is not beyond possibility that many temporary or casual farm and estate workers could be deemed to fall under limb (b).

The PPER 1992 places a duty on every employer to ensure that suitable PPE is provided to employees who may be exposed to risks to their health or safety while at work. The PPER 2022 extends this duty to limb (b) workers. Employers need to carefully consider whether the changes to UK law apply to them and their workforce and take the necessary steps to comply.



Silaging

Working with silage is potentially dangerous as high-powered machinery is being operated at speed. Other factors which increase the likelihood of an accident occurring include fatigue, poor weather and difficult ground conditions. A number of safety measures can be adopted to make silage operations safer.



Machinery Safety

- Machinery must be properly maintained and in good condition.
- Only competent drivers should operate machinery.
- The carrying of passengers should be avoided.
- Children under the age of 13 must not ride in or on any machine.
- Beware of children in fields or yards where silaging and clamping is in progress.
- Guards must be in place; in particular, PTO shafts must be properly guarded.
- Disengage the drive, apply the handbrake, switch off the engine, remove the key and allowing sufficient time to run down before clearing blockages by hand.
- Adopt the 'safe stop' procedure during maintenance operations.
- Ensure approved safety cabs or rolls bars are fitted on all machinery.
- Take care when entering or exiting yards or fields and driving on the public road.
- Keep all lights, beacons and indicators in working order.

Clamp Safety

- Do not overfill clamps, this increases the chance of a tractor or loading shovel overturning when filling or rolling the clamp.
- Do not go underneath the silage cover once it is in place, fermenting grass consumes the oxygen in the air beneath the cover quickly and anyone going underneath risks rapid death due to asphyxiation.
- On open clamps with earth embankments, slope off silage sides and ends at a safe angle of less than 45 degrees.
- On clamps where machines and their drivers can drop 600mm (2 feet) or more, ensure strong front end barriers and guide rails are installed.
- Never fill silage above the top of clamp walls, if overfilled the guard rail will no longer be effective and will increase the risk of a machine overturning.
- Avoid excessive filling which will overload walls and increase the risk to workers.

Electricity

- Be aware of the location and height of overhead power lines.
- Inform contractors of overhead power lines which may impact large machinery.
- Remember self-propelled harvesters and tipping trailers need a lot of headroom.
- If in doubt, consult UK Power Networks.
- Ensure employees are aware of steps to follow if they hit an overhead power line.

Grain Carting

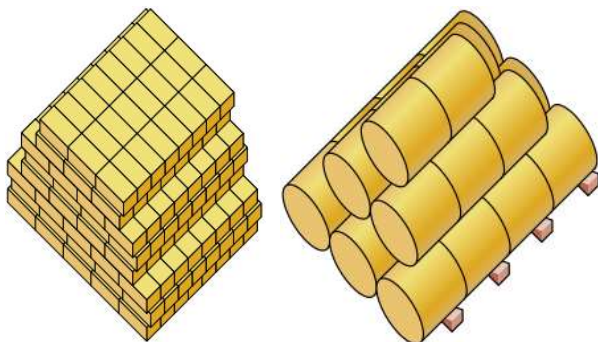
Grain carting is frequently the responsibility of the least experienced employees. Points of danger include road traffic accidents, rolling the trailer, and hitting overhead power lines when tipping, and these are exacerbated by inexperience, long working hours, and grain trailers getting larger and heavier.



The following steps should be followed to operate as safely as possible.

- Check the tractor and trailer are properly and securely hitched.
- Undertake daily safety checks and allow time for servicing and maintenance.
- Never stand underneath an unsupported trailer body.
- Do not exceed maximum permitted gross combination weight of 31 tonnes.
- Trim trees, hedgerows and vegetation around gateways to maximise visibility.
- Stay well clear of the combine harvester – it may reverse without warning.
- Do not unload the combine harvester within 10 metres of overhead power lines.
- Ensure loads are evenly distributed.
- Tip loads in a controlled manner without excessive speed or fierce braking.
- Lower the trailer body once tipping is complete and before moving away.
- Be certain nobody is behind the trailer before closing the hydraulic tailgate.
- Take regular rest breaks, and drink plenty of water to stay hydrated.

Bale Safety



As well as grain, straw will be baled and stacked at harvest. Fatal and serious accidents can arise from work activities associated with bales including falling from bale stacks, falling from vehicles and machinery used to transport or stack bales, being struck by falling bales, electrocution from contact with overhead power lines, trips and falls from loose bale string, contact with bale handling machinery such as elevators, and fires. Health problems can also be caused by lifting and carrying bales resulting in musculoskeletal injuries, and exposure to dust resulting in respiratory diseases and infections.

- Build stacks on firm, level, dry and free draining ground away from power lines.
- Select a site away from potential fire hazards and sources of ignition.
- Good road access will allow bales to be safely transported to and from the stack.
- Provide tractors, trailers and transtackers adequate room to manoeuvre.

- Fence off stacks if close to a public footpath or boundary.
- Provide signs warning people to keep clear of bale stacks.
- Only use bales of sound construction, particularly for edges.
- For big square bales, use a wide base that narrows slightly as height increases. Use alternating layers of single or double bales that tie in with those below, i.e. have an overlap of half a bale width all round to add enough stability and strength to stop the stack from splitting. Do not build higher than one-and-a-half times the width of the base, the reach of equipment available to de-stack, ten bales on hard standing or concrete, or eight bales on sites without hard standing.
- For round bales, the safest method of stacking is on their sides (stacking on their ends can lead to unstable stacks because inconsistent bale density allows bales to settle and shift) in a pyramid. Ensure the bottom rows of outside bales are chocked or fitted with stakes or supports, and that layers are overlapped by half a bale front to end.
- Monitor the stack to ensure it remains stable during and after stacking.
- Make sure there are no loose strings that could present a trip hazard.
- Dismantle or rebuild stacks that become unsafe.

Health & Safety Policy Reviews

Managing health and safety is incremental. Proper inductions, regular checks of plant and machinery, training yourself and employees to be kept up to date with new technology so that they are completing tasks in a safe and efficient manner, are all vital.

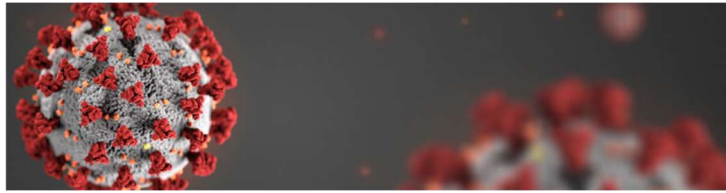
Health and safety policies must be reviewed and updated regularly, to take account of the continuously changing environment that farms and estates are subject to. Policies should be reviewed annually as a minimum, and whenever there is a significant change, such as a shift in business structure, new machinery being operated, new land being taken on, new employees being recruited, and when changes in legislation occur.

Reviewing health and safety is essential to adhere to legal requirements and to ensure that systems in existence are fit for purpose and protect the business, its employees and others, including visitors and trespassers. A review should incorporate a physical inspection, and interviews with all employees from directors and partners through to full time staff and harvest students. It should be documented to provide evidence that the business is meeting its obligations. The aim of a review is to identify strengths and weaknesses, and then look to improve any weaknesses or failure to minimise the risk of accidents or ill health occurring. It is worth having an independent audit carried out every couple of years as a professional will be aware of changes in legislation and will have seen other systems of work which may prove more effective than those currently in place. They will also bring a fresh set of eyes to the farm or estate.

A written health and safety policy must be in place where there are five or more employees. All partners and directors count as employees regardless of their day-to-day involvement in the business and are legally accountable for any health and safety failures.

Living with Covid-19

On 19th February 2022, the Government published its response to the consultation on Living with Covid-19. It identified the key objective of “removing



domestic restrictions while encouraging safer behaviours through public health advice, in common with longstanding ways of managing most other respiratory illnesses.” As recent news regarding Monkeypox demonstrates, society is still vulnerable to further outbreaks of infection and whatever happens, we must remain vigilant.

The key messages from the transition to this new strategy on Covid-19 are as follows:

- From 1st April 2022, businesses are no longer required to carry out a separate risk assessment for Covid-19 hazards.
- New guidance is available on “reducing the spread of respiratory infections, including Covid-19, in the workplace.”
- “Staying Covid-19 Secure” notices previously displayed in workplaces are no longer required.
- Although Covid-19 specific risk assessments can be archived, general workplace risk assessments should be updated to reflect hazards arising from diseases.
- Businesses may wish to keep certain risk control measures in place, such as hand sanitisers, screens between working areas where employees face each other in close proximity, and measures to increase ventilation.

As harvest approaches, the transmissibility and ill health effects of Covid-19 should continue to be considered in the context of the potential interruption to business operations, and a pragmatic approach adopted to minimise the risks involved. Further information can be found at www.gov.uk/guidance/reducing-the-spread-of-respiratory-infections-including-covid-19-in-the-workplace



Get in Touch

If you would like to discuss any topics raised in this issue of the Health & Safety Bulletin, do contact Rob Gazely.



Email: robert.gazely@ceresrural.co.uk

Mobile: 07592 041617