

The use of working platforms on fork lift trucks

There is a variety of equipment available for work at height, including scaffolding, tower scaffolds, mobile elevating working platforms (MEWPs), platforms and portable ladders. The selection and use of an appropriate and suitable method of access will depend on the nature of the task to be carried out, frequency of occurrence, duration of the work and the availability of equipment.

In many workplaces people need temporary access to work at height, particularly for maintenance activities. Working at height is a high-risk activity and the planning, selection and use of a safe means of access and working area is important.

Fork lift trucks and working platforms

Primarily, fork lift trucks are intended for lifting materials and not people. However, they can be used with working platforms to allow people to work at height **in exceptional circumstances only**.

It is generally accepted that, in conjunction with a fork lift truck, an integrated working platform provides a higher level of safety than a non-integrated type. Nevertheless, a non-integrated working platform may be used when it provides a safer means of access than, for example, improvised stairs or platforms or a ladder that would otherwise be used and it is impracticable to use an integrated working platform.

4 Example of forklift trucks with platforms are given in **Figure 1–3**.



Figure 1 Counterbalance truck with non-integrated working platform

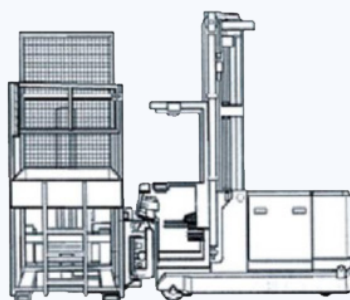


Figure 2 Very narrow aisle (VNA) truck with permissioning control working platform

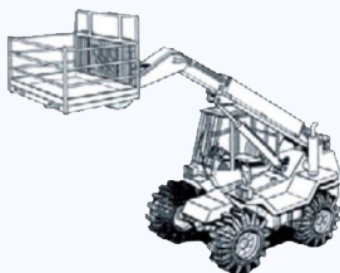


Figure 3 Variable reach truck with non-integrated working platform

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Definitions

‘Purpose-built access equipment’ means equipment that, by design, is intended to be used by people to allow them to work at height.

‘Non-integrated working platforms’ are attachments for use in conjunction with fork lift trucks to elevate people so they can work at height, but they have no controls in the platform i.e. all truck and working platform movements are controlled from the operator compartment by the fork lift truck operator.

‘Integrated working platforms’ are attachments with controls that are linked to and isolate the fork lift truck controls, so that only someone in the platform can control the platform lift height and truck movements.

‘Permissioning control working platforms’ are non-integrated working platforms with hold-to-run controls, that link to and nullify the truck lift/lower and traction controls until the controls in the platform are actuated by someone in the platform. Therefore, adjusting platform height or truck movement can only occur by the truck operator operating the truck controls when the platform controls are held by an operator in the platform.

‘Actual capacity (masted trucks)’ – the maximum weight the truck can lift to maximum lift height and specified load centre as marked on the fork lift truck’s capacity/rating plate.

‘Actual capacity (variable reach trucks (telehandlers))’ – the maximum weight, at the specified load centre, that can be lifted to the maximum lift height or to the maximum forward reach, whichever is the lower.

Occasional use

It is foreseeable but unacceptable that people will often use unsafe methods of access to work at height for short duration and occasional tasks. For example, a substantial number of serious incidents occur when people are lifted on forks or buckets, pallets or stillages placed on the forks of fork lift trucks.

To encourage safer working at height practices, the occasional use of non-integrated working platforms with fork lift trucks **in exceptional circumstances only**, is allowed in the UK only in accordance with the Health and Safety Executives (HSE) Guidance Note **PM28 Working platforms (non-integrated) on forklift trucks**.

Examples of occasional use are:

- Non-routine maintenance tasks for which it is impractical to hire in purpose-built access equipment.
- The replacement of light fittings in high-rise warehouses if the task is not carried out as part of periodic maintenance operations; tasks that would otherwise be carried out using less safe means of access such as ladders, because it is impractical to hire in purpose-designed people lifting equipment due to the short duration and occasional nature of the task, e.g. clearing a blocked gutter.
- Checking on high-level damage to racking suspected of causing an immediate risk or checking on the condition of damaged roof lights.

Routine or planned tasks, particularly those associated with production or pre-planned activities such as periodic maintenance or stocktaking, **are not exceptional circumstances** and are therefore not examples of occasional use.

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Generally, non-integrated working platforms do not provide as high a level of safety as purpose-built access equipment. Consequently, fork lift trucks fitted with non-integrated working platforms are not suitable for order picking, routine maintenance or the transfer of goods or people from one level to another.

However, stocktaking within cold stores is currently permitted using non-integrated working platforms, due to the lack of an effective alternative.

Precautions you must take if a manned platform is to be fitted to a fork lift truck

- It must be secured to the forks or carriage so that it cannot come off.
- The platform must meet the construction and inspection requirements set out by the HSE.
- There must be a safe method of use agreed before starting the work.
- Only authorised persons operate and are lifted in the manned platform.
- The operator must not leave the fork lift truck whilst the occupants are in the cage.
- Only the lift and lower lever shall be used.
- No other hydraulic levers should be used.
- The fork lift truck must be on level ground.
- The operation must be for occasional non-scheduled use.
- A thorough risk assessment of the lift must be in place.
- The fork lift truck must be secured by use of the handbrake and neutral applied.
- The Thorough Examination frequency of the fork lift truck must be at least 6-monthly.
- Persons are not to be transported within the cage.
- A method of communication is agreed between the operator and person(s) lifted prior to the work commencing.

Tilting mechanism, side shift and variable geometry attachments and the following functions must not be capable of movement while the working platform is elevated:

- Tilt or side shift.
- Chassis or mast levelling.
- Reach (reach trucks).

Health and Safety Executive guidance

The requirements for working platforms on fork lift trucks are detailed in the Health and Safety Executive (HSE) Guidance Note **PM28 Working platforms (non-integrated) on forklift trucks**.

Following PM28 guidance is not compulsory, unless specifically stated, and you are free to take other action. But if you do follow HSE guidance you will normally be doing enough to comply with the law.

Health and safety inspectors seek to secure compliance with the law and may refer to this guidance.

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Law

Legislation in the form of **Regulation 7(2)(b) of The Work at Height Regulations 2005** places a duty on employers to select the most suitable work equipment for the task to be carried out regardless of the duration of the task.

Law in the form of **The Lifting Operations and Lifting Equipment Regulations 1998** (LOLER) places duties on people and companies (duty holders) who own, operate or have control over lifting equipment, including fork lift trucks. LOLER requires that all lifting equipment be fit for purpose, appropriate for the task, suitably marked and in many cases, subject to statutory periodic Thorough Examination.

In most cases lifting equipment is work equipment, so **The Provision and Use of Work Equipment Regulations 1998** (PUWER) will also apply. Which includes the inspection and maintenance of safety-related items, such as brakes, steering and tyres.

Marking of lifting equipment with its safe working load

Regulation 23 of PUWER states: 'Every employer shall ensure that work equipment is marked in a clearly visible manner with any markings appropriate for reasons of health and safety.'

Regulation 7 of The Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) builds upon the requirements of Regulation 23 of PUWER and states:

Marking of lifting equipment

7. Every employer shall ensure that –

(a) subject to sub-paragraph (b), machinery and accessories for lifting loads are clearly marked to indicate their safe working loads;

(b) where the safe working load of machinery for lifting loads depends on its configuration –

- (i) the machinery is clearly marked to indicate its safe working load for each configuration; or
- (ii) information which clearly indicates its safe working load for each configuration is kept with the machinery;

(c) accessories for lifting are also marked in such a way that it is possible to identify the characteristics necessary for their safe use;

(d) lifting equipment which is designed for lifting persons is appropriately and clearly marked to this effect; and

(e) lifting equipment which is not designed for lifting persons but which might be so used in error is appropriately and clearly marked to the effect that it is not designed for lifting persons

Selecting a suitable fork lift truck – Truck and platform compatibility

It is essential that the working platform is compatible with the fork lift truck on which it is used. Before any combination is used for the first time the working platform and fork lift truck manufacturer/supplier must be consulted. It is particularly important to ensure that:

- The fork lift truck/working platform combination has adequate stability under all circumstances in which it is intended to be used.
- The working platform can be securely attached to the fork lift truck.

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- People on the working platform cannot reach hazardous moving parts or controls on the fork lift truck.

The weight of the working platform together with its load of people, tools, materials etc should be not more than half of the actual capacity of the fork lift truck (i.e. actual capacity for materials handling) with which it is intended to be used at the rated load centre distance, maximum lift height and maximum outreach in the case of telehandlers and reach trucks.

The actual capacity is the capacity of the fork lift truck when equipped with any specified attachments, such as side shift and when carrying out maintenance work, any items or parts placed in the working platform add to the overall weight on it. For very narrow aisle (VNA) fork lift trucks with elevated operator position and secondary load elevating mechanism, the maximum lift height should be the maximum lift height of the truck with the auxiliary mast fully raised.

Identification and use of specific fork lift truck(s)

Before the working platform is used, the user must attach a sign to it which identifies the specific fork lift truck(s) on which it can be fitted and used.

Take account of any lifting attachments fitted to a fork lift truck when identifying its suitability to be used with a working platform. Working platforms should not be used on fork lift trucks that are not identified on the sign.

Thorough Examination of fork lift trucks used to lift people

The above requirement has a significant consequence, as there is a legal requirement for Thorough Examination to be conducted at 6-monthly intervals on fork lift trucks that may be used to lift people.

Where there is a working platform which identifies a number of fork lift trucks on its sign, those trucks require Thorough Examination at an interval of at least every 6 months. However, this assumes there are no other operational conditions which may change the frequency of Thorough Examination. Conditions such as operating hours in excess of 80 hours per week or use in arduous conditions e.g. cold store or corrosive/abrasive environments. These conditions change the interval of Thorough Examination to at least every 4 months. See Technical Bulletin 05 for more details.

Exclusions from use

Non-integrated working platforms are not suitable for use on:

- Fork lift trucks that have an actual capacity of less than 1,000 kg unless their stability has been verified by testing or calculation verified by empirical data.

Note: Some fork lift truck types with an actual capacity of less than 1,000 kg may be suitable for use with working platforms, but the truck manufacturer must be consulted to ensure the stability of the truck/platform combination.

- Fork lift trucks that require manual sequencing of the lift/tilt controls to maintain the working platform horizontal while being lifted.
- Variable reach trucks (telehandlers) that can lift to a nominal height greater than 6 metres.

Note: The use of non-integrated platforms on rough terrain variable reach trucks requires extra care because of the rough terrain environment in which these machines are normally used and the nature of the pneumatic tyres fitted.

- Pallet stackers with wrap-over type forks.

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- Fork lift trucks with masts that can give erratic movement, e.g. due to sequencing problems during lowering.

Warning Signs

With the exception of working platforms intended for use on VNA trucks, a permanent notice must be fitted to the working platform. In a position where the fork lift truck operator can read it from their normal operating position when the working platform is lowered. The sign should state:

'Before elevating the platform apply the parking brake and ensure the transmission is in neutral' or equivalent.

A sign must also be provided on the working platform, where it can be read, informing the fork lift truck operator to stay at the truck controls while the working platform is in a raised position.

Communication

There must be adequate communication between the fork lift truck operator and people on the working platform, especially when raising and lowering. Handheld communication devices or a system of signals should be used where communication is difficult.

If a working platform is lifted to a height greater than 4 metres above the fork lift truck operator or the working platform is used in a noisy environment, then it is likely that communication aids will be required. Extra consideration should be given to using a permissioning control platform, integrated working platform or a MEWP in these circumstances.

CE marking of non-integrated working platforms

To encourage safer working at height practices, the occasional use of non-integrated working platforms with fork lift trucks **in exceptional circumstances only** is allowed in the UK, only in accordance with the HSE Guidance Note **PM28 Working platforms (non-integrated) on forklift trucks**.

This occasional use is allowed in the UK but may not be permitted in some other EU member states. As such, there is no free movement of non-integrated working platforms throughout the EU and they must not be CE marked.

Illustration

The illustration is extracted from HSE publication PM28 Working platforms (non-integrated) on forklift trucks Guidance Note PM28 (Fourth edition) which is available from [hse.gov.uk/pubns/pm28.htm](https://www.hse.gov.uk/pubns/pm28.htm)

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The information in this Fact Sheet has been assembled and interpreted to give truck owners and users basic guidance on frequently asked questions. Further important information will be given in the quoted reference documents. Responsibility for meeting the safety obligations discussed rests with the employer, and the UKMHA will not accept liability for any problem arising as a result of the content of this document. Technical Bulletins, containing more detailed information and updated as appropriate, are made available free to members of the **UKMHA SAFE USER GROUP**.

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