RE: Inquest of Jason Vaughan Holland – Prevention of future Death Report

With regards to the content of the ITSSAR course syllabus 'MISC 553 – Course Syllabus and Operator Testing Standards' and how ITSSAR expect their accredited training organisations to approach training and testing delivered on these machines.

ITSSAR follow the basis of the L117 approved code of practice for lift trucks – operator training and safe use as it outlines the following:

'Even though the ACOP and guidance on training apply to stacking rider operated lift trucks and do not explicitly cover all types of lift truck, the general principles can be used as a guide when training operators of other truck types.'

'The general guidance in paragraphs 97-181 covers a range of lift trucks with forks, for example, industrial counterbalanced trucks, industrial reach trucks, rough terrain counterbalanced trucks, variable reach trucks (telehandlers), side-loading trucks, container-handling trucks, articulated trucks, pedestrian-operated trucks (pallet stackers), order-picking trucks, very narrow aisle (VNA) trucks and straddle trucks. This is not an exhaustive list.'

Some of the machine types listed within this publication include VNA and order picking machines require the operator to be elevated to work.

The L117 publication includes the following three types of training of which our course syllabus covers the first stage (basic):

What should training include?

Basic training: *the basic skills and knowledge required to operate a lift truck safely and efficiently.*

Specific job training: *knowledge and understanding of the operating principles*

Familiarisation training: applying what has been learnt, under normal working conditions on the job.

Basic and specific job training, which can be combined, should take place off the job.

With regards to section 5 of the regulation 28 report:

ITSSAR feel that under the basic training and testing standards we provide operators with sufficient skill and knowledge to operate the machine safely and efficiently. However, with specific regards to rescue at height ITSSAR would like to outline the following potential issues with compiling a training programme specifically for this type of rescue:

- The operators often attend training centres for basic training that are completely different to the working environments that they will be expected to operate in
- The operators of the MEWP will not necessarily be the persons involved with rescue from height as they are the operator who will be in the platform should such a rescue be necessary
- A suitable and sufficient risk assessment will be required to be performed by the employer, specific to the work being performed at height within their specific working environments.

With regards to potential improvement areas identified within our course syllabus:

Within the knowledge section of the syllabus, we will request the training providers to include the following additions:

All work at height is properly planned and organised specifically stating the hierarchy of control measures is as follows:

- Avoid working at height where possible.
- Use work equipment or other measures to prevent falls, where work at height cannot be avoided.
- Use work equipment or other measures to minimise the distance and consequences of a fall, should one occur.

In addition:

- Ensure that work at height on a MEWP should not be performed without prior agreement and familiarisation by an operator to a company specific rescue plan relevant to the machine type, task being performed and working environment.
- Inclusion of the importance of having a safe system of work in place specifically relevant to lone working that includes:

    1. Assessing areas of risk including violence, manual handling, the medical suitability of the individual to work alone and whether the workplace itself presents a risk to them;
    2. Requirements for training, levels of experience and how best to monitor and supervise them;
    3. Having systems in place to keep in touch with them and respond to any incident.

ITSSAR instructors are all trained:

- In instructional techniques and methods
- Hold operator certification for the machine types they will be expected to deliver training and testing on.
- Are recommended to analyse all tasks on the MEWP covered in training and compile suitable lesson plans relating to the specific key points to achieve the elements, knowledge and skill detailed within the attached course syllabus.

ITSSAR would like to stress that they will be extremely keen to be involved in any future discussions or groups that are compiled to help- improve training and testing standards within the industry.