TATA STEEL

TATA

Health and safety

Code of practice

Loading and unloading of road vehicles

Table of contents

1 Scope and application 2
2 Roles, responsibilities and competence 2
2.1 Roles and responsibilities 2
2.2 Competence 3
3 Loading and unloading process 3
3.1 Loading area layout 3
3.1.1 Vehicle access to loading points (reversing) 4
3.1.2 Loading docks 4
3.2 Meet and greet at loading point 4
3.3 Suitability of equipment 5
3.3.1 Delivery vehicle 5
3.3.2 Loading / unloading equipment 5
3.4 Load configuration 5
3.5 Loading / unloading roles and responsibilities 6
3.6 Loading 7
3.6.1 Vehicle preparation 7
3.6.2 Exclusion zones 7
3.6.3 Driver safe zone / driver refuge 8
3.6.4 Working on trailers 9
3.6.5 Suspended loads 9
3.6.6 Unloading 9
3.6.7 Sheeting and securing Loads 9
4 Monitor, audit and review 10
4.1 Incident reporting 10
4.2 Auditing 10
4.3 Review 11
Appendix 1 – Pre-load checklist 12
Appendix 2 – Exclusion zones 14

1 Scope and application

This code of practice sets out the requirements for ensuring the safe loading and unloading of road vehicles on Tata Steel Europe sites. It describes both physical requirements of loading areas (such as exclusion zones and work-at-height protection) as well as procedural and communication requirements (such as driver / loader responsibilities and controlling reversing vehicles).

Tata Steel Europe hubs / units / sites must formulate, communicate and maintain documented procedures for safe loading and unloading of road vehicles on their sites.

In this code of practice, any reference to loading activities / areas applies equally to unloading activities / areas.

Tata Steel Europe health and safety standards and codes of practice are mandatory on all sites, including joint ventures where the business is operated by Tata Steel Europe.

In the context of road haulage safety, legal responsibility for the safety of a load varies from country to country. In all circumstances the driver and haulage company have the ultimate responsibility for the safety of the load at all times (on-site and off-site) and any instructions provided by Tata Steel Europe are for guidance only. It shall be made clear to road haulage service providers that they must comply with all relevant legislation, statutes, regulations, transport standards and other legal enactments whilst providing services to Tata Steel Europe.

If this code of practice creates a higher obligation than that required by local law or regulation, it should be followed as long as full compliance with the law or regulation is also achieved. In the unlikely scenario that a local relevant law or regulation requires a higher standard to be followed, that law or regulation should be followed and this should also be communicated to Group Health and Safety.

Codes of practice are part of the health and safety management system. Requirements and responsibilities for deployment as described in 'Governance and Accountabilities' and/or the Health and Safety Management System Framework equally apply.

2 Roles, responsibilities and competence

2.1 Roles and responsibilities

Tata Steel Europe hubs / units / sites must identify and allocate roles and responsibilities for loading and unloading of products and goods to and from road vehicles to ensure the safety of all personnel involved.

Road haulage contractors and Tata Steel Europe should jointly agree responsibilities for ongoing supervision and monitoring of loading / unloading activities on Tata Steel Europe sites and the agreed arrangements must be documented.

The management team for the loading / unloading area is responsible for ensuring safe operations during the loading / unloading activities (including load securing and sheeting as appropriate) and must ensure adequate control of lorry drivers is provided.

Notwithstanding the general statement above, roles and responsibilities must be clearly designated for each loading and unloading activity (see Section 3.5).

The management team for the loading area is responsible for ensuring the necessary equipment and information is provided at each loading bay to comply with the requirements of this document.

2.2 Competence

Each Tata Steel Europe hub / unit / site must take reasonable steps to ensure that lorry drivers arriving on a Tata Steel Europe site to collect a load are competent and have received the relevant training and information to safely complete the delivery.

Persons involved in loading and unloading vehicles, and management thereof, shall be provided with relevant training in:

- risk assessment of loading / unloading operations;
- procedures for loading / unloading, including application of exclusion zones, driver refuges and work at height protection;
- where relevant, mobile plant driving (crane, forklift, shunt unit, etc.) and slinging (including any product specific or site specific requirements);
- load configuration and restraint basic principles;
- relevant vehicle and load restraint equipment standards;
- relevant product specific load configuration and restraint requirements;
- the requirements of this and associated codes of practice;

Where banksmen are employed they must be sufficiently trained and competent.

3 Loading and unloading process

Loading and unloading operations must be risk assessed by the local area and relevant risk control information must be made available to all stakeholders involved.

3.1 Loading area layout

The loading area layout must be subject to an appropriate risk assessment. The risk assessment must consider the following attributes of the loading point:

- **lateral** / **longitudinal slope**: when loading areas are not level, load stability may be compromised dependent on the nature of the load; this is particularly relevant prior to load restraint being applied or when removing load restraint prior to unloading;
- **road camber**: can have a similar effect to side slope, and needs to be taken into account particularly if moving loads without full load restraint;
- **surface condition**: potholes, ruts and drains can have a destabilising effect on forklifts (and any load being carried) as well as being slip/trip hazards for pedestrians;

- **available space**: exclusion zones and designated safe havens must be agreed in advance of the operation commencing;
- **working at height**: provisions must be in place to mitigate the fall from height risk if access is required on to the back of the vehicle;
- **vehicle rollaways**: refer to HSC-23.5 Large goods vehicle parking.

Where vehicle alignment is critical (e.g. when using twin hoist cranes), alignment lines must be clearly marked and the relevant procedures must incorporate this requirement.

3.1.1 Vehicle access to loading points (reversing)

Wherever possible, reversing should be avoided. Where reversing cannot be avoided, specific controls must be implemented to ensure personnel, plant and equipment are not put at risk.

Where reversing is required, one or both of the following may be appropriate:

- **Banksmen**. Trained, competent banksmen may be used to guide and direct reversing vehicles. Where banksmen are deployed, there must be clear rules on signals and safe positioning to avoid potential for trapping;
- **Segregation of vehicles** / **pedestrians** / **other traffic**. As an alternative to banksmen, the loading area should be segregated to prevent pedestrian access during reversing. Use of robust barriers to protect plant / equipment may be necessary.

3.1.2 Loading docks

The exposed edge of loading docks must be clearly marked. Measures to prevent falls from height or mitigate the consequences must be considered.

Where loading docks extend for some distance, specific loading bays/sections should be identified wherever possible. Where there is an exposed edge with a fall from height risk within a fixed loading area a physical barrier or other edge protection should be installed.

Controls must be implemented to prevent inadvertent driving away from loading docks.

3.2 Meet and greet at loading point

The vehicle driver must park the vehicle in a designated waiting area on arrival at a Tata Steel Europe site, and go to a designated “meet and greet” point where the driver will be met by a Tata Steel Europe employee or designated representative.

Rules for parking vehicles must be established and clearly communicated. These rules must include the need to apply the vehicle parking brake, turn the ignition off and remove the keys prior to the driver exiting the cab as described in HSC-23.5 *Large goods vehicle parking.*

During the meet and greet process, drivers should have access to welfare facilities.

As part of the meet and greet process the responsible person must check that the driver:

- has a current / valid site induction;
- has received and understands local safety rules and procedures;
- is wearing all required personal protective equipment (PPE);
- if collecting a load:
    - has all the necessary load restraint equipment;
    - has been trained in the relevant load restraint method.

    Where the driver has not been trained in the product specific load restraint method, additional controls should be put in place to ensure their safety whilst loading/unloading. These additional controls could include a shunt service, chaperoning or providing additional supervision.

3.3 Suitability of equipment

3.3.1 Delivery vehicle

A competent Tata Steel Europe employee or designated representative should visually check the suitability and condition of the vehicle and associated equipment against a defined standard prior to loading. If it doesn't comply with the defined standard, then loading of the vehicle must not take place.

The vehicle type must be compatible with the loading and unloading methods used and with the lifting equipment, lifting accessories employed.

3.3.2 Loading / unloading equipment

Equipment used for loading vehicles must be suitable for the product involved. In selecting appropriate equipment for loading, take account of the need to minimise work on trucks or touch suspended loads.

The risk assessment for loading must take into account the following items when determining the suitability of equipment:

- the weight of the load;
- the nature of the load – size, shape, integrity, stability;
- the means and method of attaching / detaching lifting equipment.

3.4 Load configuration

Before loading, there should be dialogue between the loader and lorry driver to discuss what is to be loaded, and the configuration of the load.

Loads should be planned to ensure that they can be adequately secured by the driver. Load planning should take into account the effect of any part deliveries during the journey. Product loads should be planned and loaded in accordance with specific Tata Steel Europe load restraint guidelines (see HSC-23.4 *Road haulage load restraint*).

Where a product-specific load restraint guideline does not exist, loads should be built to ensure stability of the load, and to ensure that the load can be adequately secured.

Due consideration must be given to the position of the load to ensure:

- axle weight limits (maximum and minimum) are adhered to for all countries on the delivery route;
- vehicle lateral stability is not unduly affected;
- the vehicle design limits are not exceeded.

Note the driver has ultimate responsibility for the safety of the load and for ensuring compliance with relevant legislation. It is considered good practice to document the agreed load configuration within a pre-load checklist (see Appendix 1).

If disputes arise, there should be an escalation process to resolve the matter.

3.5 Loading / unloading roles and responsibilities

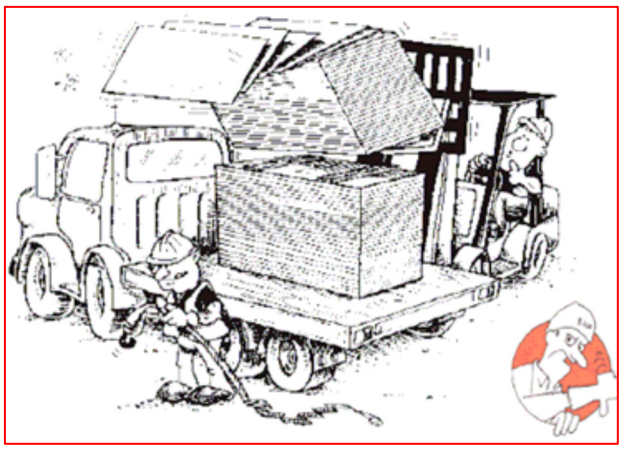
Roles and responsibilities must be clearly designated for each loading and unloading activity and these must be made clear to the people involved. This includes the loader (crane driver, forklift driver etc.), lorry driver and any other persons involved. One designated person, generally the loader, must take overall responsibility for activities during the loading / unloading process.

Wherever possible, lorry drivers should not be directly involved in the loading process. Having discussed the load configuration they should go to a safe place / driver refuge (see 3.6.3 below) until material has been loaded.

Loading crews should ideally be limited to a maximum of two people, as the more people are involved, the greater the chance for mis-communication or someone entering a danger area.

Where more than one person is involved in the loading activity:

- responsibility for leading the activity must be clearly allocated (usually to the loader / crane driver / forklift driver);
- the principle of “Can’t See [everyone]…Can’t Load” should be implemented:



This places the onus on the loader to ensure they can see all personnel involved in the operation at all times. If they cannot, then the loader must STOP until they can see everyone is in a safe place;

- a set of unambiguous signals and verbal instructions must be agreed / confirmed (these should be documented in relevant procedures and in compliance with local legislation / guidance);
- only one nominated person shall issue instructions to the loader and that person must be trained and competent to do so.

3.6 Loading

The principles set out below must be applied – actual implementation will vary across and between sites based on different operating environments, equipment used and product types.

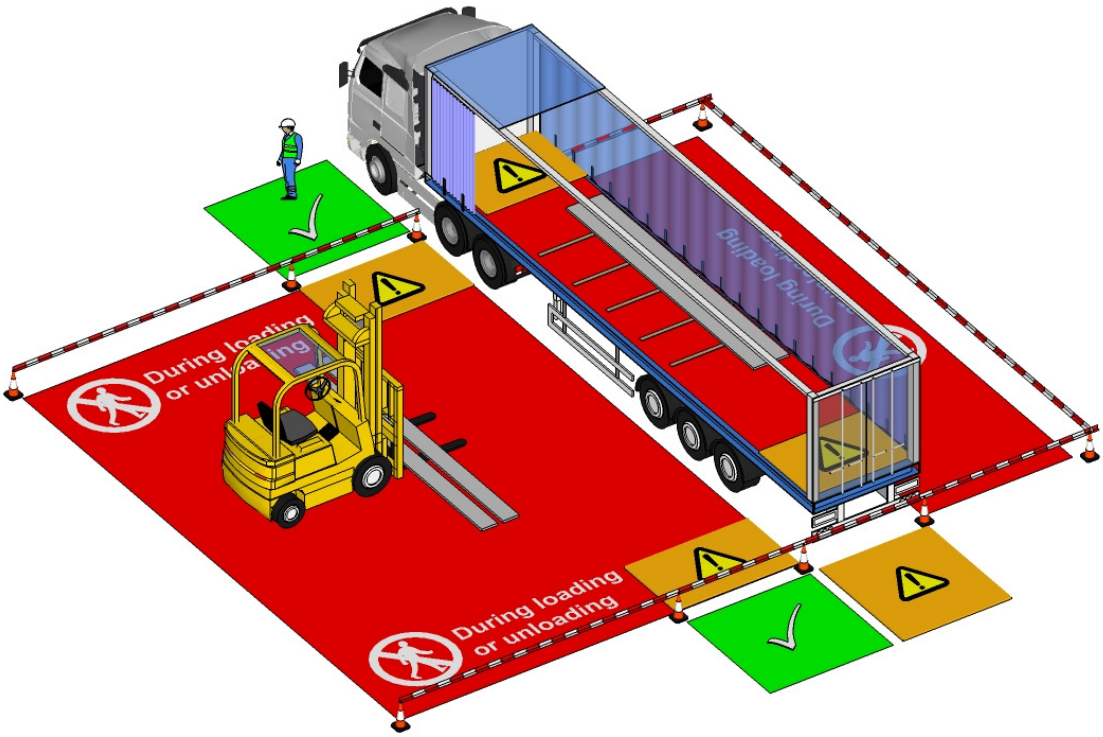
3.6.1 Vehicle preparation

Once parked in the loading area the driver must isolate the vehicle (keys out) and immobilise (apply hand brake) before exiting the cab. The trailer parking brake should be applied if the tractor unit is uncoupled from the trailer. Other isolation controls may be in place such as sleeping policemen, chocks etc. which should be proportionate to the trailer / vehicle rollaway risk.

Vehicle preparation (placing well boards, setting out dunnage etc.) should be carried out in a designated area with all required safe systems and processes in place including trailer access / working at height protection. Drivers should be supervised.

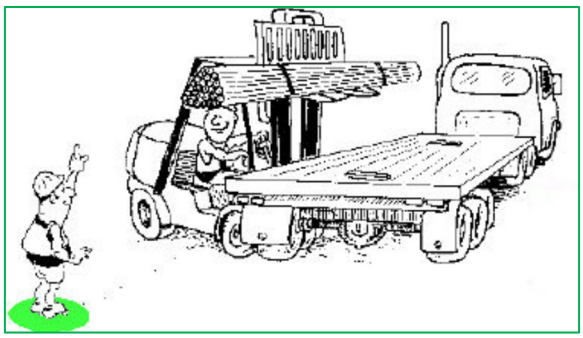
3.6.2 Exclusion zones

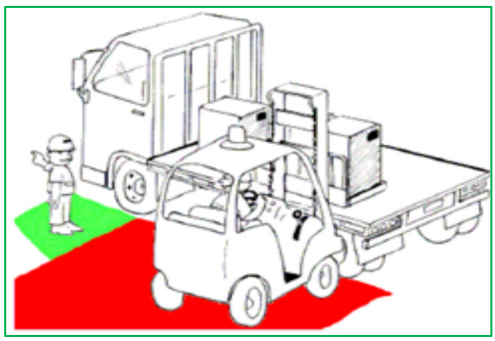
Effective exclusion zones must be implemented at every loading point. This applies whether the loading point is inside or outside a building.



The principles that must be applied are:

- unsafe "Red" zones must be clearly identified. These are the areas that **no one** is allowed to enter during loading / unloading. The size and position of the zone may vary to suit the operation, but should be large enough to ensure that should something go wrong during the activity, personnel will be far enough away to ensure their safety. Placing barriers to physically prevent access to an exclusion zone is good practice;
- safe "Green" zones or safe havens must be clearly identified. These are the areas where people should be during loading / unloading.





- "Amber" zones are those areas where there is known to be an increased risk, but for practical reasons, someone needs to enter them, for example to remove lifting equipment from a load. If Amber zones are necessary, then extra precautions needs to he taken and additional procedures may be required – e.g. forklift truck switched off and handbrake applied, or crane controller put down and isolated to prevent unintentional movement prior to entering the Amber zone.

All relevant personnel should be trained in the principles and implementation of exclusion zones. The loader (crane / forklift / mobile plant driver) is responsible for enforcing the exclusion zone and they must stop the operation if someone enters the exclusion zone or leaves the safe zone.

3.6.3 Driver safe zone / driver refuge

Where drivers are not directly involved in the loading process, they should go to a defined driver safe zone – a designated safe place where they cannot be injured should something go wrong during loading. The positioning of each safe zone is at the discretion of the loading site as per the site risk assessment.

Wherever possible, driver safe zones should:

- be located to allow the driver to view the loading process;
- provide seating and, if outside, protection from adverse weather;
- provide relevant safety or other information (e.g. load restraint guidance).

The driver must not be in his cab or on the vehicle bed during loading.

3.6.4 Working on trailers

Physically working at height on the bed of a trailer must be avoided wherever possible. Where the task cannot be completed without accessing the trailer, appropriate measures must be implemented to:

- provide safe access to the trailer bed;
- prevent falls or mitigate the consequences of falls from the trailer bed.

3.6.5 Suspended loads

The requirement to touch suspended loads during loading must be avoided wherever possible.

Suspended loads must not be taken over people, or be so close to them that they could be struck or trapped by a swinging or falling load.

When loads are being moved by overhead crane, where possible establish flight paths that avoid travelling over walkways or key equipment.

If contact with a suspended load is unavoidable, the use of equipment to position these will minimise the associated risks.

The loader must refrain from transporting any suspended loads over lorry cabs or when drivers are working on the back of a trailer.

3.6.6 Unloading

Loads must be inspected prior to the removal of any load restraint. This is to ensure, so far as possible, that the load is stable and will not slip / fall when load restraint equipment is removed.

3.6.7 Sheeting and securing Loads

Wherever possible, manual sheeting of loads should be avoided by agreement with customers and / or selection of suitable equipment (e.g. sliding canopies or Tautliners).

Where manual sheeting of loads cannot be eliminated, safe systems of work must be established for the process by the haulage company.

Specific locations must be identified and allocated for the securing and sheeting of loads. This may or may not be the relevant loading point. Selection and control of the securing and sheeting point must take account of the same factors as the loading point, e.g. slope, gradient, vehicle access, fall prevention and protection etc.

Full load restraint (as defined by HSC-23-4 *Road haulage load restraint* and associated product specific load restraint guidelines) must be applied prior to moving the vehicle onto the public highway. Options for on-site movements - see HSC-23-4.

The driver has ultimate responsibility to ensure the load is safely secured at all times. However, it is considered good practice for Tata Steel Europe hubs / units / sites to have a process of recording the load security that has been applied to the load prior to final despatch e.g. CCTV, photographs or check sheets.

4 Monitor, audit and review

Managers should have a process in place to evaluate the deployment and efficacy of this code of practice in their area of responsibility. Typical performance indicators might include compliance with exclusion zone implementation, safe parking of vehicles and the correct application of load restraint.

4.1 Incident reporting

Any incident during the loading / unloading process must be reported to a local Tata Steel Europe representative as soon as it is safe to do so. The road haulier or the road haulage managing contractor must be informed and they shall escalate the incident as per the requirements of the relevant business unit's rules.

4.2 Auditing

Where safety checks at the point of loading are undertaken feedback should be provided to stakeholders and the Road Transport Safety Group. Where the RAPID reporting system is available it should be used for recording audits and checks (refer to HSC-23-1 *Haulier engagement, communication and control*).

Tata Steel Europe hubs / units / sites should ensure this code of practice is scheduled in their internal audit program, at a minimum three year frequency. Units should review the outcomes of audits and performance measures at their health and safety forums and make recommendations for improvement where targets, aspirations and plans have not been achieved.

Any learning from:

- road transport related incident / accident investigations;
- new knowledge / technology / legislation;
- results of audits;

should be fed back to the Road Transport Safety Group.

4.3 Review

Units should review the outcomes of audits and performance measures at their health and safety fora and make recommendations for improvement where targets, aspirations and plans have not been achieved.

Users of this code of practice are encouraged to feed back any comments or experiences in the application of this document to assist in the process of continuous improvement. Feedback should be given to the Road Transport Safety Group.

This code of practice will be reviewed by the Road Transport Safety Group every three years and at any other point in time if obliged by any feedback mentioned above.

Appendix 1 – Pre-load checklist

Prior to loading a vehicle, a number of different checks are required including driver competence and suitability of equipment. In addition, for many loads it is necessary to discuss and agree the load configuration including how material will be loaded, in what order and so on.

Given the range of issues to be covered, it is good practice to utilise a pre-load checklist. This can both act as a prompt to the loader to ensure all relevant issues are covered. It can also act as a record that such checks have taken place.

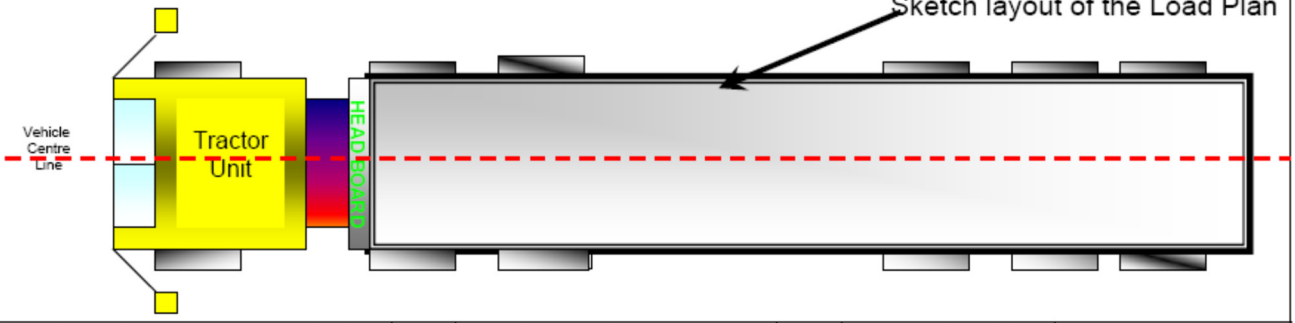
Where pre-load checklists are used, key rules and requirements can be incorporated. They can also be used to promote standardisation of load configurations. This will aid effective securing of loads as well as reducing potential for misunderstanding and mis-communication during the loading process – an issue that has been previously identified as a factor in at least one fatality within Tata Steel Europe.

The format and content of a pre-load checklist will vary from location to location – an example is given overleaf.

Load List No-:	Loader-:	Shift-:	AM	PM	Nights	Date-:

Trailer No-:

Sketch layout of the Load Plan



Number of packs to be loaded		Number of Stacks		Gross Weight	Kgs

Stack No 1	Stack No 2	Stack No 3	Stack No 4
Lifts X Packs	Lifts X Packs	Lifts X Packs	Lifts X Packs

If the Warehouse person has any doubts regarding the competency of the Driver they are to work with, they should immediately make their current activity SAFE and seek instruction from their supervisor as to the SAFEST manner to proceed with the loading operation.

Prior to Loading, always Discuss, Determine, Check, Agree and Comply with the following -:

Subject	Plate	Coil	Blank	Discs	Tick	Comments
Safe Working Procedure	030	030a	030b	030c		
Drivers Rules document WR 07						
Wear the approved Personal Protective Equipment (PPE)						
Communication Signals, Verbal (V) or Signed (S)						
Driver to Remove Lifting Dogs/Grabs from ALL PACKAGES						
Type of Lifting Tackle to be used-:			Plate Grabs			
			Beam x 3M			
			Beam x 6M			
			Chains			
			Coil Lifters			
			'C' Hook			
			Double Hook			
Final Inspection & Testing to Quality Procedure QP9						

No Of Packs	Pack Combination 3 Stacks			Tick Choice	Pack Combination 4 Stacks				Tick Choice	Actual Loading Combination due to quantity issues				Tick choice BOX, unless packages are of different sized material or Mixed product, then complete Actual Load Combination boxes. Alternatively give reason for any deviations
5	2	2	1		2	1	1	1						
6	2	2	2		2	2	1	1						
7	3	2	2		2	2	2	1						
8	3	3	2		2	2	2	2						
9	3	3	3		2	3	2	2						
10	3	4	3		2	3	3	2						
11	3	4	4		3	3	3	2						
12	4	4	4		3	3	3	3						
13	4	5	4		3	4	3	3						
14	4	5	5		3	4	4	3						
15	5	5	5		4	4	4	3						
16	5	6	5		4	4	4	4						

ALWAYS REMEMBER !

NO "Top ONE or TWO off's" during the Loading Operation.

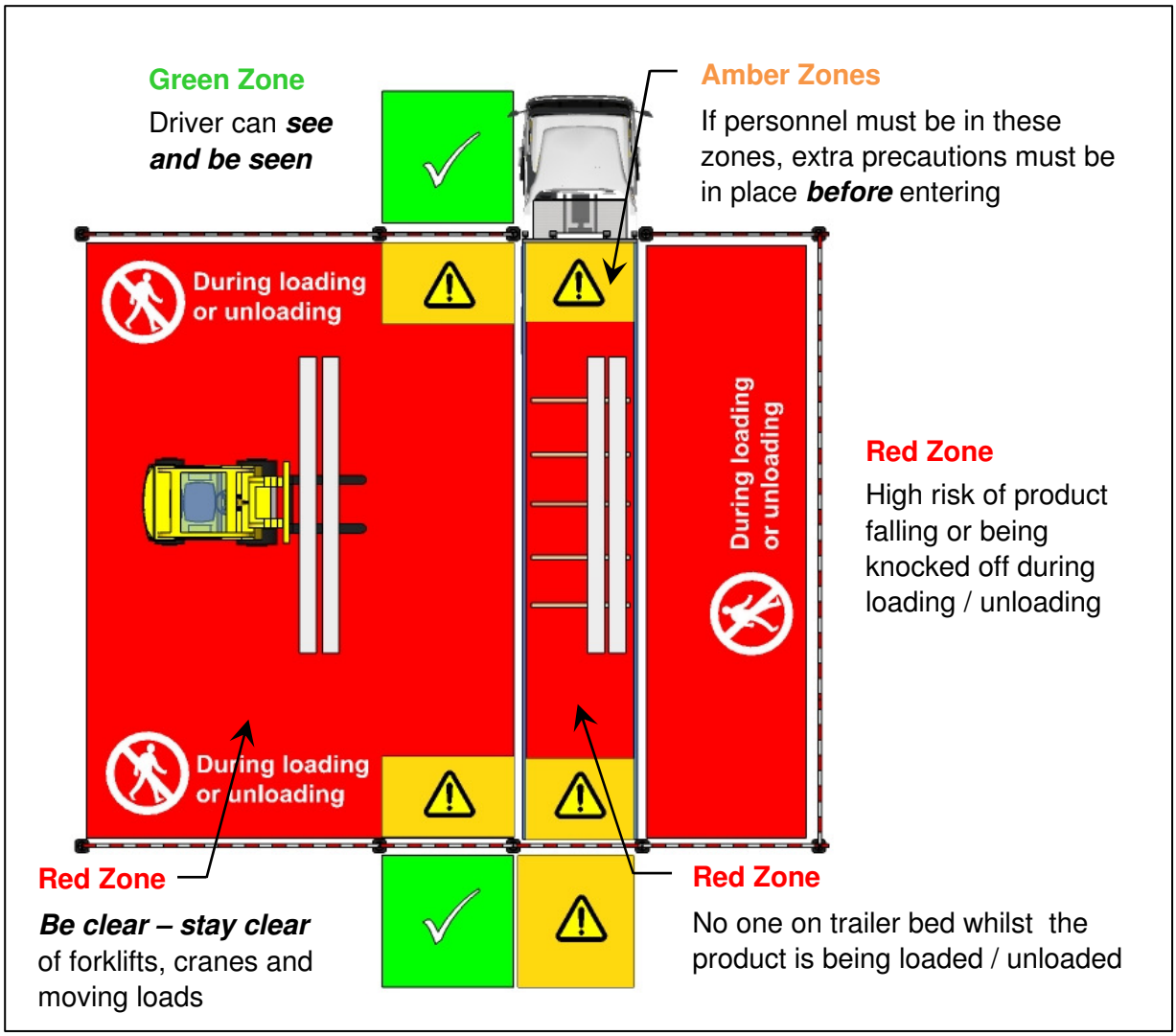
ALWAYS, start positioning from the Head Board, completing each planned stack before commencing the NEXT.

ENSURE -: All wooded Blocks & Bearers used for material separation are aligned.
ENSURE -: Steel is well presented and appears flat before being placed under tension by load security strapping.
REFER -: All issues of **"Loading Non-Compliance"** are to be addressed by a **COMPETENT** Corus employee, for the final decision on the suitability of any TDG Logistics, supplied Vehicle for purpose of Loading in accordance with our Safety Standards.

Check list completed by-: Shunter _____ Warehouse Person_____

Agreed by-: Driver _____ Competent Person _____

Appendix 2 – Exclusion zones



The loader is responsible for the exclusion zone:

- If anyone enters the red zone the loading / unloading operation must **STOP**
- If the loader cannot see all persons involved, the loading / unloading operation must **STOP.**

Can't see – can't load!

Physical barriers

Exclusion zones must be clearly identified with permanent marking and / or physical barriers.