

Code of Practice: Safe Use of Industrial Trucks

Frequently Asked Questions

Scope and Status of the Code of Practice: Safe Use of Industrial Trucks

1. What is the scope and purpose of the Code of Practice: Safe Use of Industrial Trucks?

This Code of Practice **replaces** the previous *2001 Code of Practice Rider-operated lift trucks: operator training*. It has an increased scope which addresses many of the issues associated with the operation of industrial trucks in the modern workplace. It applies to the use of all types of rider-operated industrial trucks in all workplaces. Its aim is to provide practical guidelines, based on a risk management framework and a Safe System Approach, to help duty-holders identify, assess, and control the risks specific to the operation of rider-operated industrial trucks.

The Code of Practice has several objectives, including:

- Set out the basic roles and responsibilities of those who have duties in relation to ensuring the safe operation of industrial trucks.
- Give practical guidance on how the safe operation of industrial trucks at workplaces can be achieved, in accordance with the various legislative requirements.
- Increase the awareness of the hazards associated with the operation of industrial trucks.
- Help in the assessment of risk arising from the operation of industrial trucks and the identification of appropriate control measures.
- Encourage the consistent application of safe practices.
- Provide a basis on which safety training programmes can be developed and implemented.

The purpose of the Code of Practice is to:

- Raise awareness of the hazards associated with lift truck operation.
- Promote the consistent application of safe practices when using industrial trucks.
- Highlight employers' responsibilities to ensure their workplace is safe, their operators are competent, and they provide adequate supervision.
- Help employers to do effective risk assessments and implement safe management systems.
- Provide a **framework for managing industrial truck operations** in a more holistic, safe, and sustainable way by introducing new requirements based on a Safe Systems Approach of:
 - safe drivers/operators,
 - safe vehicles,
 - safe workplace, and
 - safe operations.
- Raise the overall standard and consistency of lift truck training, by encouraging those trainers who currently deliver excellent training courses to continue to do so and to raise the quality of training courses to a minimum, common, standard by laying down **basic course syllabi** (Level 5 QQI) for **counterbalance and reach forklift trucks** and **minimum qualification requirements for trainers/instructors** (Level 6 QQI "Train the Trainer") while strengthening requirements on course duration and trainee:instructor ratio.

2. Who is the Code of Practice relevant to?

This Code of Practice is intended to be used by the following stakeholders:

- operators of industrial trucks;
- supervisors, managers and those in control of places of work where rider-operated industrial trucks are used;
- organisations providing training for operators of industrial trucks;
- businesses that hire or lease industrial trucks to others;
- safety representatives and trade union representatives; and
- employers assessing competency and training needs when employing industrial truck operators.

Persons who own, hire, lease, handle, operate, store, transport, maintain or manage the use of a rider-operated industrial lift truck in the workplace should familiarize themselves with the terms of this Code of Practice.

The Code of Practice provides a comprehensive resource for managing industrial truck risks in all workplaces.

3. Is the Code of Practice a guidance document or is it legislation?

The Code of Practice is not legislation. However, the terms of the code are admissible in evidence in a court to give practical guidance as to the observance of the legislative requirements in relation to the safe use of industrial trucks.

The new Code of Practice: Safe Use of Industrial Trucks is an approved Code of Practice, published in accordance with Section 60 of the Safety, Health and Welfare at Work Act 2005 (No. 10 of 2005). This Code of Practice provides practical guidance as to the observance of the provisions of the Safety, Health and Welfare at Work Act 2005 with regard to the use of industrial trucks in workplaces. It sets out the basic roles and responsibilities of those who have duties in relation to ensuring the safe operation of industrial trucks and the training of industrial truck operators. Section 61 of the Act provides that where a code of practice appears to the court to give practical guidance as to the observance of the requirement or prohibition alleged to have been contravened, it shall be admissible in evidence.

4. What industrial trucks fall within the scope of this Code of Practice?

The Code of Practice is aimed at providing practical guidelines to help duty-holders identify, assess and control the risks specific to the **operation of rider-operated industrial trucks**. The definition for industrial trucks used in the Code of Practice is taken from the International Organization for Standardization (ISO) standard, *ISO 5053-1:2020, Industrial trucks — Vocabulary — Part 1: Types of industrial trucks*.

The definition is as follows:

Industrial trucks are wheeled vehicles having at least three wheels with a powered or nonpowered driving mechanism — except those running on rails — which are designed either to carry, tow, push, lift, stack or tier in racks any kind of load, and which are controlled either by an operator or by driverless automation.

Descriptions and diagrams of rider-operated industrial truck types within this definition, extracted from the ISO standard, are included in Annex I of the Code of Practice.

Common rider-operated industrial trucks covered by this Code of Practice include counterbalance and reach forklifts, narrow aisle trucks, teleporters/telehandlers, side loaders, order pickers, lorry-mounted trucks, straddle carriers, container handlers, ride-on pallet trucks etc.

Training of operators

5. Whose responsibility is it to provide training?

It is the duty of the employer, under occupational safety and health legislation, to provide training to operators of all types of industrial trucks including the attachments they need for the jobs they do. Section 8 of the Safety, Health and Welfare at Work Act 2005, requires employers to provide information, instruction and supervision to employees. Section 10 sets out the specific requirements for employers when providing instruction, training and supervision to employees, in support of the general duty in Section 8. Instruction and training must be given in a form, manner and language that is reasonably likely to be understood by those receiving it. Section 10 (4) states that where, in respect of any particular work, competency requirements are prescribed, the employer shall provide for the release of employees, during working hours, where appropriate, and without loss of remuneration, for the purpose of attending training in matters relating to safety, health and welfare at work as regards the particular work.

Employers who are training their employees to operate an industrial truck have a responsibility to ensure that such training is carried out in full compliance with the terms of the Code of Practice.

Training organisations involved in industrial truck training, as well as the equipment manufacturer, should be able to advise an employer on suitable training. However, **employers have the ultimate responsibility for ensuring that industrial truck operators are adequately trained.** Employers should take account of the advice on instructor selection contained in the Code of Practice when choosing a training course and provider to ensure that the provider has the relevant competence and experience and that the course content and duration are sufficient to achieve the desired learning outcomes.

6. What are the three stages of operator training?

The training of industrial truck operators can be broken down into three stages:

- basic training, which covers the basic skills and knowledge required for safe industrial truck operation;
- function-specific job training, which covers knowledge of workplace operations and any special requirements and handling attachments; and
- training on the job under supervision, which covers industrial truck operation on the job under close supervision.

It is essential that each stage be covered fully, with due consideration given to the experience, if any, of the trainee(s) and the type (or types) of industrial truck which they will be expected to operate. The first two stages can be combined or integrated but need to be carried out off the job (that is, sheltered from production and other pressures), and in advance of the third stage. The third stage needs to be carried out on the job, but under close supervision.

Training programmes should include training for all work activities that an operator will be required to perform in the course of their work and for reasonably foreseeable situations that may arise in the workplace. To achieve this, training programmes should consist of all three stages of training.

In order to be able to prove that all three stages of training have been completed, an employer should keep a detailed record of each stage of training for each operator.

7. How can an employer satisfy themselves that a training provider is competent to train their employees?

The training of operators should be provided by suitably competent individuals or organisations. When choosing a training provider, careful consideration should be given to the qualifications, knowledge, skills and experience of the instructor(s), and their ability to demonstrate these. An employer should make enquiries with potential training providers in relation to the duration of the course, the learning outcomes covered, the time spent on practical activities, the coverage of the work activities that the operator will be required to perform in the workplace, etc. Potential training providers should be asked to supply evidence of their training and post-training experience on the type of industrial truck to be used, both as an instructor and operator, and their knowledge of and familiarity with conditions in the industry in which the trainees will work.

Operator training for counterbalance and reach trucks should only be carried out by instructors who have themselves undergone appropriate training in instructional techniques and skills assessment. Instructors should hold a QQI National Framework of Qualifications (NFQ) Level 6 Special Purpose Specification for Training and Development (QQI code 6S3372). This QQI-accredited 'train the trainer' award consists of two main modules: Training Needs Identification and Design, and Training Delivery and Evaluation. It aims to develop an understanding of the methodologies and processes available to approach training delivery and evaluation. An instructor who has earned this award is equipped with the knowledge, skills and competencies required to design, develop and deliver effective training sessions and apply best practice in assessment.

Additionally, instructors should give instruction only on the types of industrial trucks and attachments for which they themselves have been trained and successfully assessed as operators. They should be asked to supply evidence of their training and post-training experience on the type of industrial truck to be used, **both as an instructor and operator**, and their knowledge of and familiarity with conditions in the industry in which the trainees will work.

Training providers can demonstrate their competence, the quality of the courses they deliver and the maintenance of their training standards by being accredited by a relevant industry body.

8. Who will decide on matters regarding the competence of a training provider or the appropriateness of a training course provided?

Ultimately this will be a decision for a Court to make in the event of a dispute. This might arise during investigation of an industrial truck incident where training of the operator may be a factor. This Code of Practice provides the Court with practical guidance on compliance with legal requirements in relation to the use of industrial trucks and will be used to inform decisions.

9. What information should be included in an employee's training certificate? Should certificates state the number of hours/days of training provided?

On successful completion of the necessary assessments of the basic training and the function-specific job training, the instructor should issue a certificate of training to the trainee. This certificate should contain details as set out in Appendix 1. This includes the number of days of training and the hours per day.

Where a course is adapted to meet company or operator requirements, the written record of training and the employee's training record should accurately reflect the actual content of the training delivered, the learning outcomes achieved and any restrictions which apply because of the modification of the course. This modified training is generally only suitable for working in that company.

An employer must satisfy themselves as to the competence of an employee to operate an industrial truck. Where a potential employee presents themselves as already having training and sufficient operating experience, employers should satisfy themselves that this is the case. They should look for documentary evidence of the training award and satisfy themselves that the training, experience and ability are sufficient for the industrial truck and handling attachments to be operated safely in their specific working environment. Where evidence of prior training is not available or reliable, employers will need to provide training, in compliance with the Code of Practice, before allowing the employee to operate an industrial truck.

10. What about a person who has experience but was never certified? What type of training is required?

If an employer wishes to employ an employee as an operator of an industrial truck and they don't already possess a certificate of training, the employer is obliged to provide training, in compliance with the Code of Practice, before allowing the employee to operate an industrial truck.

11. What about a person who is unemployed? Can they receive training and what type of training is required?

A training course for an unemployed novice operator should consist of the first two stages of training, i.e., Basic training and Function-specific job training. However, in the case of an unemployed trainee, there is no one to specify what elements should be covered in the function-specific job training, so it would be up to the training provider to cover this in a more general manner. Appendix 2 of the Code of Practice outlines general learning outcomes for counterbalance and reach forklift truck skills.

Fundamental elements should be included in this, such as:

- conditions that industrial trucks operators typically meet at work (for example: gangways or ramps, loading bays, loading platforms, racking, lifts, automatic doors, confined areas, cold stores, slopes, rough terrain, bad weather conditions),
- general site safety rules (for example: industrial truck operating zones, one-way systems, speed limits, general emergency procedures, use of protective clothing and devices, including operator restraints and eye and hearing protection, working near overhead lines and other hazards),

- training in typical work activities (for example: reversing, stacking and de-stacking pallets and other loads, loading of racking and vehicles, handling loads and materials typically found in workplaces, assessment of load characteristics, operating in aisles, operating on slopes and ramps, manoeuvring around obstacles),
- instruction on typical safe systems of work to ensure the safe use of industrial trucks (for example: use of safety devices and restraint systems, wearing seatbelts, conducting pre-shift inspections, operating in the vicinity of other people, refuelling and changing batteries, key control procedures).

A trainer who has a Level 6 “Train the Trainer” qualifications, combined with operator and instructor training and sufficient industrial experience to enable them to put their instruction in context, should be capable of formulating this element of the training. The Safe Workplace and Safe Operations parts of the Code of Practice can be used to inform this.

On successful completion of the necessary assessments of the basic training and a generalised function-specific job training, the instructor should issue a certificate of training to the trainee. This certificate should contain details of the training provided in the persons training record (based on the template in Appendix 1). Because this has not been influenced by an employer, particular care should be taken by the trainer to document what has been covered and what may not have been covered. This is to allow a potential employer to understand the extent of training provided.

If that person subsequently obtains employment and presents themselves as already having training and sufficient operating experience, the new employer must satisfy themselves that this is the case. (This is similar to an already trained employee changing employment or changing to operate at a new site, as outlined in Question 12).

The employer should look for documentary evidence of the training award and satisfy themselves that the operator’s training, experience and ability are sufficient for the industrial truck and handling attachments to be operated safely in the working environment. This may involve them contacting the training provider to verify the provision and extent of training.

If the employer is satisfied that appropriate basic and function specific training has been provided to the new employee, they must proceed to the third stage of training, i.e., “training on the job under supervision”. This needs to be carried out “on the job”, i.e., the operator carrying out the typical activities required by the job, but this should be under close supervision for whatever period is necessary until the employer is satisfied that it has been successfully completed. However, if the employer identifies that there are any gaps in the operator’s training, they should arrange for an additional element of conversion training to address those gaps.

If or when the employer is satisfied that the operator can operate safely in their workplace, they should record the satisfactory completion of this element of training in the employee’s training record before providing the employee with written authorisation to operate the type(s) of industrial truck(s) for which all three elements of training have been successfully completed. Operators should be authorised in writing. Authorisations should state the operator’s name, the date of authorisation, the truck(s) to which they relate, and any special conditions. Authorisation should be specific and limited to those industrial trucks that the operator has been trained to use and should also be site specific.

12. What should happen if a jobseeker presents seeking employment with a certificate of training?

Where a potential employee presents themselves as having training and sufficient operating experience already, employers must satisfy themselves that this is the case. They should look for documentary evidence of the training award, and ensure the documentation is sufficient to satisfy themselves that the training, experience, and ability is in fact sufficient to meet the requirements of this Code of Practice and to allow safe operation of the industrial truck(s) and handling attachment(s) in the specific working environment concerned.

Where evidence of prior training is not available, sufficiently detailed or reliable, employers will need to provide training before allowing the employee to operate an industrial truck. In the case where evidence of prior training (basic and function-specific) is available and reliable, an employer should apply the third stage of training, i.e., training on-the-job under supervision.

New employees or employees operating at a new site who are already the holders of a certificate of training should always satisfactorily complete the third stage of training, training on the job under close supervision, before being allowed to operate an industrial truck unsupervised at a site new to them. This training needs to be carried out on the job and under close supervision by someone with appropriate knowledge and experience. It should cover the application, under normal working conditions, of the skills already learned and include familiarisation with the assigned industrial truck and its controls, any accessories used, the loads to be lifted or moved, the site layout, local rules and emergency procedures, and any other feature of the work that is not practicable to teach off the job. The employer should record the satisfactory completion of this element of training in the employee's training record before providing the employee with written authorisation to operate the type(s) of industrial truck(s) for which all three elements of training have been successfully completed.

13. Is there a specified operator training course for all types of industrial trucks?

No. The Code of Practice specifies the minimum requirements and learning outcomes for courses for counterbalance and reach trucks only, which are based on a national QQI standard. Trainers must be able to demonstrate that they can deliver a course which meets these requirements, *as a minimum*. This does not prevent trainers from using training frameworks and documentation developed under other accreditation schemes, provided they can show that they fulfil all the requirements and learning outcomes of the courses specified in Appendix 2 of the code.

For training programmes for other types of industrial trucks, the principles set out in the learning outcomes of the counterbalance and reach industrial truck operator training programmes in Appendix 2 of the Code of Practice should be adapted and applied.

14. What training is required for teleporters/telehandlers?

A telescopic handler is an item of work equipment, and the employer has an obligation to train the operative under Sections 8 and 10 of the Safety, Health and Welfare at Work Act, 2005, and to satisfy themselves as to the competency of the training providers and that the standard of training is appropriate for their needs. It is also an industrial truck under the scope of this Code of Practice when it is configured for lifting and stacking of unit loads. Hence, the requirements for training under the Code of Practice can be used as the benchmark for training to be provided for the operators of this type of industrial truck.

There are specific legislative requirements for the training of telescopic handler operators in the construction and quarrying sectors under the Construction Skills Certification Scheme (CSCS) and the Quarry Skills Certification Scheme (QSCS), respectively, which are separate to the requirements of this Code of Practice. Outside of these industry sectors, the terms of the Code of Practice should be used to inform the fundamentals of the training of operators of telescopic handler industrial trucks in other workplaces. The new entrant courses under the CSCS can also, if appropriate, be used to inform the fundamentals of a training course for operators working in a workplace other than in the construction sector.

15. What training is required for the use of a banksman or assistant?

Banksmen/signallers should only be used in exceptional circumstances where other control measures are not possible. In circumstances where the use of a banksman/signaller to assist the operator of an industrial truck is an appropriate risk reduction measure only a trained and authorised person should be used for this purpose. The level of training to be provided to such a person can only be determined by a risk assessment of the activity to be carried out to ensure that the information and instruction provided is sufficient to ensure their safety.

Some of the industry training bodies have developed courses of this nature.

Requirements for Training Providers

16. What is the transition period for the Code of Practice?

Most elements of this Code of Practice came into immediate effect on publication of the Code of Practice on September 12th, 2025. However, there are two limited exceptions outlined in Section 2.8.12 of the Code of Practice.

Where an operator has been trained and can demonstrate evidence of that training under the 2001 Code of Practice, *Code of Practice: Rider-operated lift trucks: operator training*, such training will continue to be recognised under this new Code of Practice.

Training providers operating under the terms of the 2001 Code of Practice can, if required, continue to operate under the requirements of that Code for a period of 18 months from the date this Code of Practice comes into operation (12 March 2027), after which time all operator training should be in accordance with the requirements of this Code of Practice. This means that training providers of counterbalance and reach truck operator training who do not possess Level 6 “train the trainer” qualifications have an 18-month period to acquire these qualifications if they want to continue delivering such training programmes.

Every aspect of the Code of Practice, other than the requirement for trainers of counterbalance and reach operator training to acquire Level 6 “Train the Trainer” qualifications, **came into immediate effect on publication of the Code of Practice**. Employers and operators should apply those terms which are applicable to them.

17. Where can Level 6 “Train the Trainer” courses be found?

Further Education and Training (FET) offer a wide variety of life-long education options. FET courses and programmes are provided through the Education and Training Board (ETB) network throughout

the country as well as through other local providers including online through SOLAS' eCollege. FET courses are provided at levels one to six on the [National Framework of Qualifications \(NFQ\)](#).

Courses and course locations can be searched for on the Further Education and Training Course Hub (FETCH) available at <https://www.fetchcourses.ie/>

There may be certain eligibility criteria for a course, but the course provider or ETB can be contacted for more information.

18. Does the Instructor have to have a Forklift Instructors Qualification?

Yes. The requirement for instructors to be able to demonstrate their competence is outlined in Section 2.8.6 of the Code of Practice. There are three elements to this competence:

- Successful assessment as operators for the industrial trucks and attachments they intend to provide training on
- **Successful assessment as an instructor for the type of truck and attachments they intend to provide training on, and**
- Holder of an award for QQI National Framework of Qualifications (NFQ) Level 6 Special Purpose Specification for Training and Development (QQI code 6S3372). Trainers who are not the holders of this qualification have until 12 March, 2027 to achieve this qualification.

When arranging training, an employer must be satisfied that the instructors delivering the course are competent to do so. They should be asked to supply evidence of their training and post-training experience on the type of industrial truck to be used, both as an instructor and operator, and their knowledge of and familiarity with conditions in the industry in which the trainees will work. This will include expertise in any requirements particular to the operation of the truck(s) and in the work the trainees will be expected to undertake. Since training is largely accomplished through demonstration followed by supervised practice, it is essential that each demonstration by the instructor is a model free from technical errors and misjudgements. Instructors must also be able to make effective use of instructional techniques in both the working and classroom environments.

Good instructors should:

- Be able to demonstrate competence to operate the truck they are training on
- Keep their own training and experience as instructors up to date, especially if they are not training regularly.

There is a requirement for all instructors delivering courses on counterbalance and reach industrial trucks to hold a QQI Level 6 award for Training and Development. This is the nationally recognised qualification for those who work as professional trainers. The component specifications for this award are detailed in Appendix 3. This QQI-accredited 'train the trainer' award consists of two main modules: Training Needs Identification and Design, and Training Delivery and Evaluation. It aims to develop understanding of the methodologies and processes available to approach training delivery and evaluation. An instructor who has earned this award is equipped with the knowledge, skills and competencies required to design, develop and deliver effective training sessions and apply best practice in assessment. Successful training depends on the competence of instructors. A forklift instructor's course is not a replacement for this qualification.

Instructors should give instruction only on the types of industrial trucks and attachments for which they themselves have been trained and successfully assessed as operators. They also need sufficient industrial experience to enable them to put their instruction in context and an adequate knowledge

of the working environment in which the trainee will be expected to operate. An instructor's course is required to meet the requirement outlined in bullet 2 above.

When arranging for training, employers should satisfy themselves that the training is in accordance with this Code of Practice.

19. My trainer qualification is accredited by a recognised industry body. Do I need to renew this training as well as achieving the QQI Level 6 train the trainer qualification?

Instructors should be able to demonstrate (to employers and Inspectors of the Health and Safety Authority) that they:

- are competent to operate the industrial truck they are providing training on, and
- keep their training and experience as instructors up to date.

Instructors have flexibility about how they do this in practice.

Accreditation by a third-party organisation is not mandatory under the Code of Practice but it is one method of demonstrating competence and continuing professional development. Training providers can demonstrate their competence, the quality of the courses they deliver and the maintenance of their training standards by being accredited by a relevant industry body. It is also a method for employers to have independent verification of trainer competence when they are selecting trainers. Being accredited by a relevant industry body enables an instructor to demonstrate to an employer:

- that they are competent to deliver the course,
- their training and post-training experience on the type of industrial truck to be used, both as an instructor and operator, and
- their knowledge of and familiarity with conditions in the industry in which the trainees will work.

If a trainer chooses to use accreditation for the above purposes, then they must meet the requirements set by the accreditation bodies for their membership.

The QQI Level 6 qualification for Training and Development is a one-time qualification. This is the nationally recognised qualification for professional trainers.

Training Duration

20. What is the minimum course duration for a novice operator.

The duration of training may vary depending on the objectives to be covered, the trainee: instructor ratio, and the trainees' ability and previous experience. **The normal duration of a course for novice operators is 32.5 hours over 5 days** (based on an assumption of 6.5 contact hours per working day). In **certain circumstances**, the duration of a training course may be reduced to 3 or 4 days. In **such circumstances, the reduction should be justified in writing by the training provider, in consultation with the employer**. The justification to reduce a training course must take account of the operator's previous experience and their current level of skill in operating the industrial truck for loading and lifting operations in the workplace. **In all cases, the time devoted to training needs to be sufficient to ensure that the basic training objectives and assessments of operator skills and learning outcomes can be achieved.**

3 days is the minimum course duration for a novice operator.

A trainer should not deliver a reduced course based on operator prior experience unless they are fully satisfied of the operator's experience and can justify same in writing. Where a course is adapted to meet company or operator requirements, **the record of training and the Employees Training Record should accurately reflect the actual content of the training delivered**, the learning outcomes achieved and any restrictions which apply because of modification of the course.

Justification of a reduced training time may come under scrutiny:

- (a) during an inspection or review by the Health and Safety Authority,
- (b) by a judge in the event of an incident leading to injury of an employee.

Training ratio

21. What is the desirable trainee:instructor:truck ratio for a typical training programme?

The desirable trainee:instructor:truck ratio is 3:1:1, but in any case, the ratio should not exceed 4:1:1 except for lecture or theory sessions.

The ratio of trainees to instructors and to trucks should enable the instructor to demonstrate each part of the practical training and allow each trainee to obtain adequate hands-on experience while also having an opportunity to learn from the performance of other trainees who may be in attendance. There should be adequate time for each trainee to practise operating the truck under close supervision and to prepare for the practical assessments of the learning outcomes.

Training location

22. Should training be delivered at the employer's location or in a training centre?

Basic training may be given at a suitable training centre or venue, or on an employer's premises.

Basic training needs to be carried out off the job. Even when conducted on an employer's premises, this means that the instructor and trainees, together with the industrial truck and loads they are training on, should be wholly concerned with training, kept away from normal commercial operations, and trainees should not be diverted to other activities while training is in progress. The minimum training time set out in the Code of Practice (32.5 hours for novice operators) is based on the assumption of direct face-to-face interaction between the trainer and trainee(s) for this period.

In order to maintain a safe environment, the training area must have its access restricted to the instructor and trainees. Warning signs should be prominently displayed at each access point. Where practicable, training areas should be sheltered from adverse weather conditions.

In a similar fashion, function-specific training, which covers knowledge of workplace operations and any special requirements and handling attachments, may be given at a suitable training centre or venue, or on an employer's premises.

The third stage of training needs to be carried out on the job, that is, at the employer's premises. It needs to be carried out on the job and under close supervision by someone with appropriate knowledge. It should cover the repeated application, under normal working conditions, of the skills already learned including using the assigned industrial truck and its controls, any accessories used, the loads to be lifted or moved, the site layout, local rules and emergency procedures, and any other feature of the work that is not practicable to teach off the job.

The employer should record the satisfactory completion of this element of training in the employee's training record (example provided in Appendix 1 of the Code of Practice).

Refresher training

23. Is there a requirement for refresher training?

The Safety, Health and Welfare at Work Act 2005 sets out a requirement for training to be repeated periodically.

There is no specific requirement to provide refresher training after a set period of time, but even trained and experienced industrial truck operators need to be reassessed from time to time to ensure that they continue to operate industrial trucks safely. This assessment of the need for refresher training should form part of an employer's normal monitoring procedures and be formally scheduled to ensure that it is done at reasonable intervals.

In addition to routine safety monitoring and competency retention, refresher training might be appropriate where operators:

- have not used industrial trucks for some time,
- return to work after an extended absence,
- are occasional users of industrial trucks,
- appear to have developed unsafe working practices,
- have had an accident or near miss, or
- experience a change in their working practices or environment.

Employers may find it useful to record reassessment and refresher training in their safety monitoring records. Employers can decide that automatic refresher training after a set time period is the best way of making sure that employees are operating safely, but, where this approach is adopted, it will still be necessary to monitor performance in case retraining is required before the set period ends.

The guiding principle is that the possession of a training certificate alone does not ensure the safe operation of industrial trucks, and employers need to maintain the competence of the operator through a documented, formal process of monitoring and assessment.

24. What is the timeframe when conducting refresher training i.e. how many hours?

There is no set period of hours specified for refresher training as this will depend on the assessment of the need for training.

People lose skills if they do not use them regularly, and it is important to maintain good operating habits. They can also develop bad practices and habits. Refresher training facilitates the appraisal of an operator's skills, and new skills can be learned during refresher training. The need for refresher training should be considered as part of an employer's safety management system, and this should be recorded in a schedule.

When it is determined that refresher training is needed, it should be approached with the same attention to detail as basic training in order to ensure that all gaps in existing skills and knowledge are identified and covered during training (see section 2.7.6. and 2.7.7. of the Code of Practice).

Refresher training will only be applicable to operators who have already completed all three stages of training.

Conversion training

25. What is conversion training and when is it required?

An operator who has been trained for one type of industrial truck or handling attachment cannot safely operate others for which they have not been trained without additional conversion training.

Conversion training to allow operators to extend the range of industrial trucks they are qualified to operate should be provided when an operator is required to operate a different type of industrial truck than what they have previously been trained on. For example:

- There may be significant variations in the configuration or application of controls, even in the same truck types.
- There may be an introduction or change of a handling attachment.
- An operator may be required to operate a significantly larger or more powerful industrial truck.
- An operator may be required to operate a completely different type of truck, such as a narrow aisle man-up stacking truck or a side-loading truck.
- An operator may be required to operate on a different site or in a different environment.

26. As a training provider I typically conduct training on two types of industrial trucks, i.e., counterbalance forklifts and multi-directional trucks. Should the five-day training requirement be completed separately for each truck type, or can both be covered within a single five-day training programme?

Employers have a duty under occupational safety and health legislation to provide training to operators of all types of industrial trucks and the attachments they need for the jobs they do. It is essential that all three stages of training are covered fully, with due consideration given to the experience, if any, of the trainee(s) and the type (or types) of industrial truck which they will be expected to operate.

A five-day training course for a novice operator, incorporating basic and job-specific training, should be completed on the type or types of industrial trucks they will be expected to operate. The training programme should include training for all work activities that the operator will be required to perform in the course of their work and for reasonably foreseeable situations that may arise in the workplace.

An operator with training on one type of industrial truck or handling attachment cannot safely operate others for which they have not been trained without additional conversion training, so if an operator who has been trained on one type of industrial truck is subsequently required to operate a different type of truck, conversion training will be required.

In line with the Code of Practice, it is expected that the normal duration of training for a novice operator on a single type of industrial truck would be five days. If an operator has successfully completed basic training and job-specific training for one type of industrial truck, including satisfactory assessment of skills, **additional conversion training** would then be required for any other types of industrial truck. Hence, the overall expectation is that training for two truck types would exceed 5 days and should be scheduled so that training on the job under supervision and authorisation of the employee to operate the first type of truck in the workplace would be completed before conversion training for the second truck type takes place.

Authorisation

27. If there are currently workers who are trained as forklift drivers do they need to be authorised in writing by the employer at this stage or is this something that can be done when refresher training is due next time?

Operators should be authorised in writing by the employer. The employer should provide the employee with written authorisation to operate the type(s) of industrial truck(s) for which all three elements of training have been successfully completed. Only authorised operators with the relevant training should be allowed to drive and operate industrial trucks in the workplace. Employers should not allow personnel to operate industrial trucks on any premises without authorisation (except in the case of a trainee under close supervision).

Authorisation should be specific and limited to those industrial trucks that the operator has been trained to operate. Authorisation should also be site specific.

28. How is authorisation done in practice? Is an electronic signature acceptable?

Following satisfactory completion of training, the employer should provide the employee with written authorisation to operate the type(s) of industrial truck(s) for which all three elements of training have been successfully completed.

Authorisations should state the operator's name, the date of authorisation, the truck(s) to which they relate, and any special conditions, such as area limitations. Authorisations may be issued on an individual basis and/or recorded centrally by the employer.

The Safety Health and Welfare at Work Act, 2005, allows for the electronic holding of records.

Supervision

29. Is an employer's responsibility fulfilled by providing an operator with training to operate an industrial truck

No. The provision of training does not remove the employer's responsibility to ensure that operators are fully competent to operate industrial trucks within their specific workplace or the legal requirement to have adequate supervision in place to ensure that the operator is operating safely and in accordance with workplace protocols and systems of work.

Training alone will not ensure the competence of individuals; this will develop with experience and should be monitored.

The guiding principle is that the possession of a training certificate alone does not ensure the safe operation of industrial trucks, and employers need to maintain the competence of the operator through a documented, formal process of monitoring and assessment.

The Safety, Health and Welfare at Work Act 2005 requires employers to provide supervision necessary to ensure the safety, health, and welfare at work of their employees. Continued supervision is necessary to ensure that good standards of operation are maintained.

30. Do my supervisors need to have training to meet the requirements for monitoring and supervision?

It is essential that supervisors have enough training and knowledge to recognise safe and unsafe practices in the operation of industrial trucks. They need to understand the risks involved, and how to avoid or prevent them. Employers must be satisfied that supervisors are competent to carry out effective observation and recognise unsafe practices and behaviour in both operators and other persons in the vicinity of industrial trucks. To facilitate this, it may be necessary to offer appropriate training to supervisors and managers of work activities involving industrial truck operations. This does not necessarily mean that supervisors must have received full industrial truck operator training, although this would be beneficial.

Some of the industry training bodies have developed courses of this nature.

Medical fitness and Medication and intoxication

31. Is medical assessment of driver operators mandatory, and does the Code of Practice now require drug and alcohol testing for operators?

Section 2.4 and 2.5 of the Code of Practice set out the requirements around medical fitness, medication, and intoxicants.

The Code of Practices advises that if an employee has a medical condition that may affect their ability to operate a forklift truck or a lift truck safely, an occupational health assessment is recommended.

The requirement not to be under the influence of toxicants in the workplace may be built into terms of employment and other internal policy documents, e.g., an Intoxicants at Work policy.

There is no requirement under health and safety legislation for employers to test employees for intoxicants. Testing for intoxicants is a policy for individual employers to implement.

Intoxication at work should be identified as a potential hazard and should be addressed within the company's safety statement and addressed in a risk assessment, with appropriate control measures applied. If an employee's intoxication or behaviour presents a potential risk of danger to him/herself or others, the employer has an obligation to remove this risk.

The Code of Practice advises that if an employer suspects that an employee is under the influence of an intoxicant at work, they should refer to their Intoxicants at Work policy.

More information on Intoxicants at Work is available in the Health and Safety Authority's information sheet:

https://www.hsa.ie/media/lpihhpjz/intoxicants_at_work_information_sheet.pdf

Risk Assessment

32. Is there a sample Risk Assessment available for guidance?

A Guide to Risk Assessments and Safety Statements is available at:

<https://www.hsa.ie/media/ameaedb0/103525-hsa-1-risk-assessment-brochure.pdf>

The information contained in this guidance document will help an employer or self-employed person to manage safety and health in their workplace(s) by preparing risk assessments. The terms of the

Code of Practice will help to inform the control measures that should be put in place in respect of the safe use of industrial trucks.

Seat belts

33. Is wearing a seatbelt necessary when operating an industrial truck?

Seatbelts and other restraint systems should be used when they are provided, unless a risk assessment indicates it is not safe to do so and other risk controls, which provide the same level of protection or higher, are implemented. This means that there can be some reliance on risk assessment to determine other adequate mitigation measures to justify situations where the use of seat belts may not be needed.

34. If the fork truck in use is an older model with no seat belt, am I required to upgrade to a model with a seat belt?

If the fork truck in use is an older model with no seat belt it is advisable to consult with the manufacturer as part of the process of carrying out an appropriate risk assessment on the need for a seat belt on the specific model type. They may be in a position to advise on the possibility of retrofitting a seat with a seat belt on that model type.

35. Are seat belts required on reach trucks?

Generally speaking, seat belts are usually not supplied on reach trucks, but this is conditional on the CE certification carried out by the manufacturer when certifying the EN Standards that the truck complies with. The manufacturer should be consulted to verify whether seat belts are required.

36. Does an operator need to wear a seat belt on a reach truck if they frequently get on and off the machine to pick pallets after they've been dropped?

Seat belts should be used when they are provided, unless a risk assessment indicates that it is not safe to do so and other risk controls that provide the same level of protection or higher are implemented.

General and Application

37. Does the Code of Practice apply to existing FLT drivers in the workplace?

Where an operator has been trained and can demonstrate evidence of that training under the 2001 Code of Practice, *Code of Practice: Rider-operated lift trucks: operator training*, such training will continue to be recognised.

Every aspect of the Code of Practice, other than the requirement for trainers of counterbalance and reach operator training to acquire Level 6 "Train the Trainer" qualifications, **came into immediate effect on publication of the Code of Practice**. Employers and operators should apply those terms which are applicable to them.

38. Does the Code of Practice apply to motorised power pallets trucks without stands, - operated by pedestrians walking behind them?

A pedestrian pallet truck (walk behind) falls outside the scope of the Code of Practice, purely because of the distinction applied to the definition of industrial trucks for the purpose of the Code, i.e., “rider-operated”, so strictly speaking the terms of the Code do not apply to that type of truck. That said, such a pallet truck is an item of work equipment, and the employer has an obligation to train the operative under Section 10 of the Safety, Health and Welfare at Work Act, 2005. They must satisfy themselves as to the competency of the training providers and that the standard of training is appropriate for their needs. Because the pedestrian pallet truck closely resembles its ride-on counterpart, the terms of the Code of Practice should be used to inform the fundamentals of that training.

39. Can a person under the age of 18 years operate an industrial truck?

No. Under Regulation 51 of the Safety Health and Welfare at Work (General Application) Regulations 2007 (S.I. No. 229 of 2007), as amended, **persons under the age of 18 are not permitted to operate lifting equipment.**

40. What is the situation with regard to lifting persons using a personnel cage on an Industrial Truck?

Regulation 48(1) of the Safety Health and Welfare at Work (General Application) Regulations 2007, as amended, deals with lifting people using machines that are designed for lifting loads, e.g. forklift trucks and telehandlers. It states that an employer shall ensure that work equipment not specifically designed for the purpose of lifting persons is not used to this effect other than in exceptional circumstances. Reading Regulation 48 in conjunction with Part 4 of the General Application Regulations 2007 relating to work at height, particularly Regulation 100(b)(iii), means that people should only be lifted by equipment specifically designed for lifting persons. Mobile work equipment, such as mobile elevating work platforms (MEWPs), is readily available for hire or purchase.

The term “exceptional circumstances” used in Regulation 48 is not applicable to jobs which are planned in advance, irrespective of their duration, nor does it apply to activities which could safely be delayed until proper access equipment is obtained. An exceptional circumstance should be a rare event.

Regulation 48(2) does not allow people to be lifted by devices which permit a free fall mode to be engaged while lifting people.

The HSA emphasis is on the planning and assessment of risks in advance of work being undertaken and on the selection of the most appropriate work equipment for lifting persons, taking account of the work to be done and the surrounding environment.

A definitive decision on whether a particular set of circumstances could be considered as ‘exceptional circumstances’ would lie with the court system rather than the HSA.

Application in the agricultural sector

41. Are industrial loaders covered by the Code of Practice?

An industrial loader (loading shovel, front end loader) does not come under the scope of the Code of Practice: Safe Use of Industrial Trucks, because it does not fall under the definition used for the scope. Similarly, a variable-reach telehandler type of industrial truck **that is not configured for lifting or stacking**, e.g., when it is fitted with a loading shovel (bucket), does not strictly fall under the scope of the Code of Practice.

However, they are items of mobile work equipment and there is a general requirement under the Safety Health and Welfare at Work Act 2005 to ensure that the operator of such work equipment in any workplace is trained. If an employer is deciding on the extent of training required for an operator of such a machine, they should recognize that training for this type of machine (e.g. telehandler, front end loader) is legislated for in other industries, such as quarrying and construction. Those training schemes could be used to inform the fundamentals of training to be provided to an operator operating this type of machine in all other work sectors.

For reference, the definition used for the Code of Practice is as follows:

For the purposes of this Code of Practice, the definition for industrial trucks from the International Organization for Standardization (ISO) standard, ISO 5053-1:2020, Industrial trucks — Vocabulary — Part 1: Types of industrial trucks, is adopted:

Industrial trucks are wheeled vehicles having at least three wheels with a powered or non-powered driving mechanism — except those running on rails — which are designed either to carry, tow, push, lift, stack or tier in racks any kind of load, and which are controlled either by an operator or by driverless automation.

A variable-reach truck telescopic handler tele-handler type of industrial truck that is being used for lifting and stacking is within the scope of the Code of Practice because it complies with the definition above and the description in Annex 1 [extracted from ISO 5053-1:2020] below.

variable-reach truck
telescopic handler
tele-handler
lift truck fitted with one or more articulated arms, telescopic or not, non-slewing or having a slewing movement of not more than 5° either side of the longitudinal axis of the truck used for stacking loads

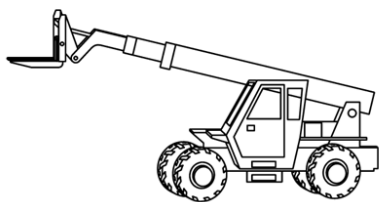


Figure 20 — Variable-reach truck

This machine is used for lifting and stacking when it is fitted with an attachment for the purpose of lifting a “unit load”, such as pallet forks or a grab, e.g., bale grab, etc. However, when it is fitted with an attachment for moving loose bulk material, such as a shovel (bucket) or silage forks, it falls outside the scope of the Code of Practice. A further reason for this is that the movement of loose bulk materials in a shovel (bucket) is generally not considered as lifting operations for the purposes of International Standards or occupational safety and health legislation.

42. What type of machinery used on farms come under this code of practice?

Typically, the type of machines commonly used on farms and ancillary operations which fall under the scope of the Code of Practice include counterbalance lift trucks, rough terrain lift trucks, variable-reach tele-handlers (configured for lifting or stacking), and lorry mounted lift trucks (e.g., Moffett Mountie).

These truck types are listed in Annex 1 of the Code of Practice [extracted from ISO 5053-1:2020]) under the headings; counterbalance lift trucks, articulated counterbalance lift trucks, rough terrain trucks, variable-reach truck telescopic handler tele-handlers, rough-terrain variable-reach truck telescopic handler tele-handlers, and lorry-[truck-] [trailer-] mounted trucks.

With reference to the definition for industrial trucks (see Question 41 above) and the descriptions of the various truck types in Annex 1 of the Code of Practice, the variable-reach truck telescopic handler tele-handler type of industrial truck **falls under the scope of the Code of Practice when they are configured for lifting or stacking of unit loads.**

If a variable-reach truck telescopic handler tele-handler type of industrial truck is not configured for stacking the Code of Practice does not strictly apply, but it still meets the definition of an item of work equipment for which an operator should be trained (as per Question 41).

Enforcement of the Requirements of the Code of Practice

The intention is that, during inspections, inspectors will be focussing on compliance with the Code of Practice in relation to training of operators, authorisation of operators, and supervision.