

# Q&A for Safety Code

Prepared by the HAUC-UK Safety Code working group

## 1 What is the latest version of the Safety Code?

At the time of writing, the last time any amendments were made to the Safety Code was in June 2014. This version can be distinguished from the earlier version (published in October 2013) by looking inside the front cover. Under the line on Crown copyright it says:

2nd impression (with amendments), June 2014

There is no difference between this version and the third impression published in September 2014. It merely indicates a new print run.

If the code is amended in future it will include the phrase "with amendments", for example:

Nth impression (with amendments), Date.

Otherwise, it will be just another print run.

## 2 Can you clarify the position on vehicle mounted traffic signs?

Where fitted, vehicle mounted signs must comply with TSRGD. This has particular implications for rear facing, vehicle mounted keep right (or left) signs on works vehicles. Regulation 14 states that where the speed limit is 40mph or more these signs must be to diagram 7403.

Diagram 7403 is a large sign and it is not always practicable to mount this sign on certain vehicles, particularly small vehicles or vehicles with specialist equipment attached to the rear such as gully emptying lorries or wheeled excavators fitted with hedge/grass cutting machinery.

However, vehicle mounted signs are not compulsory. They can be omitted if it is determined through a site specific risk assessment that, for a given situation and level of vehicle conspicuity, the works can be carried out safely this way. Another alternative would be to use the short duration works layout as shown on page 89 where the required signing is static.

## 3 Does the Safety Code apply to street works being carried out in a private road?

Yes, provided that the works come under the definition of street works in England, Wales and Northern Ireland, or road works in Scotland.

## 4 The code says that 750 mm high traffic cones must be used on roads of 50mph or more. This can be difficult to comply with at short duration works which are often carried out from small vehicles. In what circumstances might smaller cones be used?

One of the changes the new Safety Code introduced was a requirement for 750 mm traffic cones to be used on single carriageway roads with a speed limit of 50 mph or more. This was included to improve consistency between the code and Chapter 8 of the Traffic Signs Manual.

In addition to static sites, this requirement applies to short duration works that last more than 15 minutes. However, it is recognised that it is not always practicable to carry 750 mm cones in the smaller vehicles sometimes used for short duration stops. This note explains that, where it is appropriate, 450 mm cones may be used.

The first paragraph on page 91 says "Some short duration works may be undertaken without the use of static signs or cones provided that a site specific risk assessment demonstrates

that traffic can pass the works vehicle safely and without difficulty, and there is low risk to operatives and road users"

Although it does not specifically mention the possibility of determining through a risk assessment that smaller sized cones might be acceptable, such a consideration is within the spirit of the code.

This clarification should not be perceived as a licence to use smaller cones as a matter of course on such short duration works. A risk assessment must be able to clearly demonstrate, for each site, that the use of smaller cones will not compromise safety.

**5 Can you confirm if road sweeping vehicles always have to comply with the advance signing requirements for mobile works as shown on page 84, particularly in urban areas?**

The following text is from page 91 of the Safety Code.

*Some short duration works may be undertaken without the use of static signs or cones provided that a site specific risk assessment demonstrates that traffic can pass the works vehicle safely and without difficulty, and there is low risk to operatives and road users. Examples might include meter reading, leak detection or gully emptying alongside a single carriageway road where operatives are working wholly on the footway or verge.*

Although it omits to mention mobile works vehicles such as road sweepers, it is quite clear that in terms of operational risk, these vehicles are little different from, for example, gully emptiers. As such, it would be reasonable to apply the advice on risk assessment in the above extract to road sweeping operations.

However, it is essential that for each site it can be clearly demonstrated through a risk assessment that the omission of such signs will not compromise safety. It should be appreciated that the higher the speed limit on the road, the greater the difference between the speed of the mobile works vehicle and that of other vehicles will be.

**6 When should risk assessments be recorded? What form should they take?**

The Safety at Street Works and Road Works Code of Practice places considerable emphasis on the need to carry out risk assessments but it does not prescribe their format. This will depend on the task being undertaken and the complexity of the site safety requirements.

Health and safety legislation requires that where an employer has five or more employees, the significant points of risk assessments need to be recorded. (This rule applies even if most employees are office based and there is, for example, only one employee on site.) However, the Safety Code makes no distinction as to the number of employees - its requirements with regard to risk assessments apply regardless of the size of the organisation involved.

In addition, the requirement to record the significant points of a risk assessment is a minimum requirement. Owing to the complexity of street and road works, the range of circumstances, and the risks involved, risk assessments will often need to be recorded in more detail.

**7 Our vans have metal panels instead of glass in the rear doors. Although most of the rear is covered in chevrons, we use the "window" space for the name of our company, not chevrons. Does this comply with the code?**

The code says that "chevrons should cover as much of the rear-facing portion of the vehicle as possible without obscuring windows, vehicle lighting or the registration plate". This wording was included to encourage more coverage than a simply chevron strip at the top and bottom of the doors.

Omitting chevrons from these panels would be no different from omitting them from windows, were they to be fitted present. As such, your arrangement would be deemed to comply with the code.

**8 With regard to vehicle conspicuity, the code says "... all vehicles stopping on the carriageway for works purposes ...". Do the vehicle conspicuity requirements in the code apply to, say, inspectors or supervisors using their private vehicles?**

The advice needs to be read in context. The purpose is to reduce risk where it is greater than the risk present in normal traffic conditions. If a risk assessment determines that a person associated with the works using a private vehicle was at a risk similar to that of a typical motorist in a similar vehicle under everyday circumstances, then conspicuity aids would not be required (although they might be preferred). It would be reasonable to assume that all private vehicles used by, for example, inspectors or supervisors would be provided with magnetic amber roof beacons at a minimum.

For vehicles slowing down to enter the site, or slow moving vehicles undertaking asset inspections etc., beacons might be sufficient. Where exposure times are greater (e.g. an average user may stop in an area not usually used for parking for say an hour a week, while maintenance workers may be doing that for 2 hours or more a day at several locations), then additional conspicuity measures such as chevron signs might become necessary. Where rear chevron markings are required, the percentage of vehicle coverage could be determined by a vehicle specific risk assessment.

In many cases, the assessment might recommend semi-permanent chevrons stuck to the owners vehicle. If this is not acceptable, serious consideration should be given to providing a dedicated works vehicle thus equipped for this purpose.

**9 Do works vehicles need to keep their amber beacons lit within a site?**

If a dedicated works vehicle forms a material part of the traffic management (i.e. at mobile or short duration works sites) it must be conspicuous - beacons and high visibility rear chevron markings are strongly recommended in England and Northern Ireland, and compulsory in Scotland and Wales.

If a stationary dedicated works vehicle is located within a properly set up static site, it will not normally need chevrons or beacons - the static arrangement should already be providing the conspicuity required.

**10 Does the advice on advance site visits for planned works on pages 10 and 12 of the code include mobile and short duration works?**

Yes in principle, although for these works, the required site specific risk assessment can be carried out by a competent person immediately before carrying out the works instead of involving a separate advance visit. Should the risk assessment determine that additional safety measures or time requirements are necessary, the works might need to be rescheduled.

**11 Does the Safety Code apply to road works on Highways Agency roads?**

No - only street works. Section 71 of the Traffic Management Act, which was enacted to make the Safety Code apply to road works, expressly refers to local highway authorities. As such, the code does not apply to the Highways Agency's Maintenance Agent Contractors.

(Note that for street works on trunk roads, applying the Safety Code in isolation may not meet the minimum requirement for road user or road worker safety (ALARP as specified in Chapter 8 of the Traffic Signs Manual).)

**12 The advice on page 9 says that "Only appropriately trained ... persons should be engaged in ... signing, lighting, guarding and temporary traffic control."**

**Does this mean everyone on site has to have a prescribed qualification in signing, lighting, guarding?**

No. The code does not override the requirements of s67 of NRSWA. While it says "Only appropriately trained ... persons should be engaged ..." only one operative has to hold the prescribed signing, lighting, guarding qualification.

The code does not define "appropriately trained" - that is something for supervisors or other competent persons to determine depending on the circumstances. At the very least this might simply amount to someone who has been verbally instructed on how to, say, safely replace displaced traffic cones. The essential message is that in whatever form that training has taken place, it should be appropriate to ensure a given task is carried out by someone who knows what to do, and how to do it safely.

**13 Can you clarify what the code means when it discusses "fixing" or "securing" in relation to footway ramps, footway boards, temporary covers and road plates?**

It is not the intention of the code to define in all cases exactly how footway ramps, footway boards, temporary covers or road plates should be secured. Fixing methods vary but essentially, once these components have been installed, they should stay securely and safely in place until they need to be removed. The decision as to what is required will therefore depend on the site-specific conditions and risks.

All such elements must be stable in normal use so that they do not pose a hazard to people passing over them, either on foot or using a vehicle. Normal use would also include accidental actions that might cause displacement (e.g. kicking, heavy braking). If vandalism or theft can be reasonably foreseen, then additional precautions will be necessary.

Ultimately, it is for competent personnel on site to satisfy themselves that the fixing methods used are appropriate for any given site.

**14 On page 30, the code says "At all static works, pedestrians must be protected by a continuous system of barriers". This is not always practicable where road resurfacing is being carried out. Could you please clarify what is required here?**

The requirement to use continuous pedestrian barriers comes under the section on footway and footpath works (starting on page 28). There is no similar requirement for works in the carriageway. As such, there is more flexibility in how pedestrians are protected during road resurfacing operations.

The guiding principle throughout the Safety Code is that pedestrians must be provided with a safe route past the works and they must be protected from any hazards arising from the works themselves. The methodology used to achieve this should relate to the specific site conditions identified in the risk assessment.

It is worth bearing in mind that in the no-works situation, the protection to pedestrians from moving traffic afforded by a simple kerb is often considered adequate. As such, provided that the works do not affect the footway it might be reasonable to assume that no more than this is required. Having said that, resurfacing works involve plant that has a greater chance of affecting pedestrians because, for example, it could overhang or slew over the footway. There is also the possibility that material such as planings might be ejected over the footway. Provided these and other risks are properly assessed and any additional precautions put in place (localised barriers, temporary closure of the footway, etc.) the justification for continuous barriers reduces.

Ultimately, the risk assessment must determine whether pedestrian barriers are necessary or not.

**15 Page 89 shows a diagram for short duration stops more than 15 minutes on a single carriageway road. A longways clearance is provided but there is no mention of a sideways safety zone. Is this correct?**

A sideways safety zone is not specified for short duration works as shown on pages 89 and 90 because that is normally a feature of static sites where barriers are installed. In addition, these short duration arrangements are often used where operatives might be working well away from the live traffic or even off the carriageway altogether. However, as noted at the bottom of page 86, the layouts show the minimum standards generally required. If a site-specific risk assessment determines that additional width within the coned area is necessary, you should provide it.

**16 For the short duration stops layout shown on page 87 of the code, does the carriageway width of 6.75m still apply when using a road narrows sign without a 'single file traffic' supplementary plate?**

Unobstructed road widths are not specified for short duration works on single carriageways. In some cases, the remaining width might restrict traffic to 'give and take' shuttle working. Static give and take layouts (see page 57) are limited to 30 mph roads and require more signing than shown in the layouts on pages 87 and 89. This limitation and the additional requirements for static sites do not normally apply to short duration works because, by their very nature, they are not in place for long. As such, exposure to risk is over a much shorter time. However, as noted at the bottom of page 86, the layouts show the minimum standards generally required. If a risk assessment determines that these layouts are not suitable for the conditions at a particular site, additional signing or, in some cases, a static closure may be required.

**17 The layout on page 89 for short duration stops more than 15 minutes on a single carriageway road doesn't appear possible on a 60 mph road owing to the 50 m maximum overall permitted length. Can you confirm?**

This is correct. The title should read "Short duration stops more than 15 minutes on a single carriageway road up to 50 mph".

**18 Can you clarify when traffic signal heads at a junction should be bagged off?**

At signalised junctions, where works are taking place that render the traffic signals temporarily redundant, the Safety Code does not specifically require that traffic signal heads are bagged off. However, the advice on page 43 assumes that the signals are inoperative, in which case a 'Light signals ahead not in use' sign erected on all approaches is all that is required.

Where it is not practicable to switch the signals off, it is essential that steps are taken to ensure they cannot mislead road users. In this case, the 'Light signals ahead not in use' signs must be supplemented by bagging off the signal heads. A suitably robust (and opaque) cover should be used - a black bin liner, for example, would not be considered acceptable.

Where permanent signals are replaced by temporary ones, 'Light signals ahead not in use' signs should not be used.

**19 In Scotland, are pedestrian barriers capable of withstanding winds of Class B required if the site is inspected every 24 hours?**

If an unattended site is checked every 24 hours, it does not need to comply with the enhanced pedestrian barrier wind criterion on page 98 of the Safety Code. The inspection of a site by, say, a roads authority inspector is not deemed as an inspection in this case. The inspection should be undertaken by or on behalf of the organisation directly responsible for the site.

A site does not need to meet the criteria set out on page 82 of the Safety Code to be subject to a 24 hour check.

**Q20: What are the correct failure modes for portable light signals?**

A20: There are 2 failure modes - 'fail to all-red' and 'fail to all-off'. Either may be used on the public highway

**Q21: I need to work on a footway. How do I decide when it is appropriate to close it?**

A21: There is an implicit hierarchy for footway work within the code giving the order in which you should consider the options. The safety code says that you should always try to enable pedestrians to remain on the footway and that the remaining width available to them should ideally be a minimum of 1.5m, so that is the preferred option and it is therefore the first in the hierarchy. If there is not enough room for 1.5m, you should then consider the next option, and so on. The basic rule is that you should not choose an option without good reason if the one above it would work. The hierarchy is as follows:

- 1 Works partially obstruct footway, 1.5 m minimum width remaining for pedestrians.
- 2 Works partially obstruct footway, 1.0 m minimum width remaining for pedestrians.
- 3 Footway closed, 1.2 m minimum width walkway provided in the carriageway.
- 4 Footway closed, 1.0 m minimum width walkway provided in the carriageway.
- 5 Footway closed, no walkway in the carriageway, pedestrians expected to use footway on opposite side.

Whichever option is chosen, it should be accompanied by an appropriate site risk assessment. Note that the above are minimum widths, **not widths to aim for**. For example, if you have to resort to option 3 because options 1 and 2 won't work, don't go straight to 1.2 m if there is room for a wider walkway.

**Q22: The diagram on page 89 for short duration stops of more than 15 minutes on a single carriageway road does not work with a 60mph speed limit. What arrangement should I use in these circumstances?**

You should risk assess the situation to see if the prevailing traffic speed would allow for safe operation using:

- the page 89 layout for 50mph; or
- the page 89 layout for 50mph but with an impact protection vehicle; or
- the appropriate static layout.

**Q23: I need to work on a dual carriageway. Can I consider the guidance in Highways England's Interim Advice Note 150 in order to avoid carrying signs across the carriageway?**

A23: The warning box at the bottom of page 18 of the safety code says:

*You should only cross a live carriageway on foot when traffic flows are low enough to regularly produce sufficient gaps between vehicles to allow time to cross safely. For dual carriageways, the need to place signs in the central reservation must be assessed before you proceed and you should consult your supervisor, manager or other competent person.*

As such, and provided that it is with the specific agreement of the highway/road authority, if a site-specific risk assessment determines that it is safer overall to omit signs from the central reservation (or any other locations) in accordance with IAN 150, then doing so is acceptable. IAN 150 is available at:

[http://www.standardsforhighways.co.uk/ians/pdfs/ian150\\_15.pdf](http://www.standardsforhighways.co.uk/ians/pdfs/ian150_15.pdf)