

SECTION 3(12)

MANUAL HANDLING

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INTRODUCTION

Departments must comply with the Manual Handling Operations Regulations 1992 (MHOR). Health and Safety Executive (HSE) Guidance on Regulations L23, and it is recommended that this be read in conjunction with this section.

Work-related musculo-skeletal disorders affect a large and growing proportion of the UK working population. They involve the muscles, tendons, joints and skeleton; particularly in the back, hands and arms. The symptoms vary from mild aches and pains to severe swelling and inflammation. Occupationally, estimates of the size of the problems vary, but the most recent yearly figures show that 59 million working days are lost through back problems alone. Some 55,000 injuries due to handling, lifting or carrying accidents are reported to the HSE each year. This amounts to approximately one third of all reportable accidents.

GUIDELINES

An attempt to put numerical guidelines on manual handling operations has been made in the Guidance on Regulations. For example, Figure 1, in Appendix 1 entitled "Guidelines for Lifting and Lowering", sets out an approximate boundary within which operations are unlikely to create a risk of injury sufficient to warrant detailed assessment. Similar guidelines for various other manual handling operations are also given. You should be aware that any operations which exceed the guideline limits are expected to be fully assessed and you may be required to show evidence of such assessments to an HSE Inspector.

STEPS REQUIRED BY THE REGULATIONS (SEE APPENDIX 2: "FLOW CHART")

Step 1: Identification of Potentially Hazardous Manual Handling Operations

Regulation (3)(1) of the Management of Health and Safety at Work Regulations 1999 requires suitable and sufficient assessments of the risks to the health and safety of employees.

Where there is a possibility of risk of injury from the manual handling of loads, the MHOR should be observed. Departments must identify specifically which tasks, and under which circumstances injury may be caused as a result of a manual handling operation.

Step 2: Avoidance of Manual Handling - Regulation 4(1)(a)

The MHOR require the avoidance of the need for employees to undertake any manual handling operation which involves a risk of being injured. However, if a manual handling operation cannot be avoided, e.g. by mechanisation, then a suitable and sufficient assessment must be made with a view to taking appropriate steps to reduce risks of injury to the lowest level reasonably practicable.

Step 3: Assessment of Risk - Regulation 4(1)(b)(i)

If a potentially hazardous manual handling operation cannot be avoided then a suitable and sufficient assessment must be made with a view to reducing the risk of injury so far as is reasonably practicable. Assessment of a work process must look at the task, the load, the working environment and individual capability to analyse the forces which the operation may impose on the body and to identify where problems may occur (See Appendix 1). It may be necessary to involve the workforce in this process and sickness, absence and accident records may help to identify priority areas.

Appendix 2 provides a flow chart that sets out the sequence of actions required when applying the regulations to particular manual handling operations. If the manual handling operations

carried out within your Department/Section are many and varied, and possibly at different locations, a generic assessment may satisfy the demands of the regulations.

A distinction is made in the Guidance between an assessment and the everyday judgements that supervisors and others will have to make. The assessment should identify in broad terms the problems likely to arise during the kind of operations that can be foreseen.

Recording the assessment

In general, the significant findings of the assessment should be recorded and the record kept, readily accessible, as long as it remains relevant. However, the assessment need not be recorded if:

- (a) it could very easily be repeated and explained at any time because it is simple and obvious; or
- (b) the manual handling operations are quite straightforward, of low risk, and are going to last only a very short time, and the time taken to record them would be disproportionate.

Making a more detailed assessment

When a more detailed assessment is necessary, it should follow the broad structure set out in Appendix 4. The Appendix lists a number of questions in five categories including the **task**; the **load**; the **working environment**; and **individual capability**. Not all of these questions will be relevant in every case.

Assessment checklist

It may be helpful to use a checklist during assessment as an aide-memoire. An example of such a checklist is provided in Appendix 3. This checklist addresses not only the analysis of risk, but also the identification of steps to reduce the risk. The particular example given will not be suitable in all circumstances; it can be adapted or modified as appropriate.

Remember – assessment is not an end in itself, merely a structured way of analysing risks and pointing the way to practical solutions.

Step 4: Reducing the Risk of Injury - Regulation (4)(1)(b)(ii)

Having identified hazardous manual handling operations and assessed those which cannot be avoided it is now necessary to introduce controls to reduce risk to the lowest level reasonably practicable. The same structured approach used during the assessment of risk should be applied in turn to the task, the load, the working environment and individual capability.

In reducing the risk of injury with respect to the task, improvements may be made to the task layout, by using the body more effectively, for example by removing the need for twisting, stooping and stretching. Improvements could be made to the work routine, by handling whilst seated, by ensuring team handling operations are carried out safely where it would be difficult for one person to operate, Manual Handling Operations and other clothing may be provided, for example suitable gloves, aprons or overalls.

Equipment should be suitably maintained and be accessible. When considering reducing the risks of injury with respect to the load, this may be achieved by making it lighter, or making it smaller or easier to manage, by making it easier to grasp, more stable or less damaging to hold.

The working environment may be improved by removing space constraints by improving the nature and condition of floors, by ensuring a suitable working temperature and ventilation and by suitable lighting.

When considering the individual capability of the person carrying out the operations the risk of injury may be reduced by paying particular considerations to employees who e.g. have recently been pregnant or who are known to have a history of back trouble, hernia or other health problems. It will be necessary to identify which of the staff within your control fall into these types of categories.

Step 5: Review of Assessment - Regulation 4(2)

The assessment must be reviewed if either there is reason to suspect it is no longer valid or there has been a significant change in the manual handling operation.

PROVISION OF INFORMATION AND TRAINING

Where there is a risk of injury, Regulation 4(1)(b)(iii) requires the provision of general indications and, where it is reasonably practicable, to provide precise information on the weight of each load and the heaviest side of any load whose centre of gravity is not positioned centrally.

Inherent in the Regulations is also a requirement to provide employees with information and training on manual handling as well as on injury risks and prevention. Such training programmes for safe manual handling must include:

- (a) How potentially hazardous handling operations may be recognised.
- (b) How to deal with unfamiliar handling operations.
- (c) The proper use of handling aids.
- (d) The proper use of Manual Handling Operations.
- (e) Features of the working environment that can contribute to safety.
- (f) The importance of good house keeping.
- (g) Factors affecting individual capability.
- (h) Good handling technique.

EMPLOYEES LEGAL DUTIES - REGULATION 5

The MHOR require each employee of the Council to make full and proper use of any equipment or system of work provided to him in compliance with these regulations. Every employee must inform his line manager about any physical condition suffered which might reasonably be considered to affect their ability to undertake manual handling operations safely.

REMEMBER IF IN DOUBT ASK - DON'T LIFT

FURTHER INFORMATION

Manual Handling Operations Regulations 1992 Guidance on Regulations L23 HSE Books 1998
ISBN 0-7176-2415-3

Solutions you can handle, HSG115 HSE Books 1994 ISBN 0 7176 0693 7

Lighting at work, HSG38, HSE Books 1998, ISBN 0 7176 1232 5

Seating at work, HSG57, HSE Books 1998, ISBN 07176 1231 7

Upper limb disorders in the workplace: A guide to prevention, HSG60, HSE Books 2002,
ISBN 0 7176 1978 8

A pain in your workplace? Ergonomic problems and solutions, HSG121, HSE Books 1994
ISBN 0 7176 0668 6

Getting to grips with manual handling: A short guide for employers, INDG143, HSE Books 2000,
ISBN 0 7176 1754 8

If the task fits: Ergonomics at work, INDG90 (rev), HSE Books 1997, ISBN 0 7176 1379 8

**Manual handling risk assessment detailed
assessment guidelines filter**

Introduction

1. The Manual Handling Regulations set no specific requirements such as weight limits. Instead, they focus on the needs of the individual and set out a hierarchy of measures for safety during manual handling operations:
 - (a) avoid hazardous manual handling operations so far as is reasonably practicable;
 - (b) make a suitable and sufficient assessment of any hazardous manual handling operations that cannot be avoided; and
 - (c) reduce the risk of injury from those operations so far as is reasonably practicable.

Risk assessment filter

2. Where manual handling operations cannot be avoided, employers have a duty to make a suitable and sufficient assessment of the risks to health. This assessment must take into account the range of relevant factors listed in Appendix 4. A detailed assessment of every manual handling operation, however, could be a major undertaking and might involve wasted effort. Many handling operations, for example lifting a tea cup, will involve negligible handling risk. To help identify situations where a more detailed risk assessment is necessary, HSE has developed a filter to screen out straightforward cases.
3. The filter is based on a set of numerical guidelines developed from data in published scientific literature and on practical experience of assessing risks from manual handling. They are pragmatic, tried and tested; they are not based on any precise scientific formulae. The intention is to set out an approximate boundary within which the load is unlikely to create a risk of injury sufficient to warrant a detailed assessment.
4. The application of the guidelines will provide a reasonable level of protection to around 95% of working men and women. However, the guidelines should not be regarded as safe weight limits for lifting. There is no threshold below which manual handling operations may be regarded as 'safe'. Even operations lying within the boundary mapped out by the guidelines should be avoided or made less demanding wherever it is reasonably practicable to do so.
5. It is important to remember that the purpose of the guidelines is to avoid wasted time and effort. The use of the filter will only be worthwhile, therefore, where the relevance of the guideline figures can be determined quickly, say within 10 minutes. If it is not clear from the outset that this can be done, it is better to opt immediately for the more detailed risk assessment.

Guidelines for lifting and lowering

6. The guidelines for lifting and lowering operations assume that the load is easy to grasp with both hands and that the operation takes place in reasonable working conditions with the handler in a stable body position. They take into consideration the vertical and horizontal position of the hands as they move the load during the handling operation, as well as the height and reach of the individual handler. For example if a load is held at arm's length or the hands pass above shoulder height, the capability to lift or lower is reduced significantly.

7. The basic guideline figures for identifying when manual lifting and lowering operations may not need a detailed assessment are set out in Figure 1. If the handler's hands enter more than one of the box zones during the operation, the smallest weight figures apply. It is important to remember, however, that the transition from one box zone to another is not abrupt; an intermediate figure may be chosen where the handler's hands are close to a boundary. Where lifting or lowering with the hands beyond the box zones is unavoidable, a more detailed assessment should always be made.

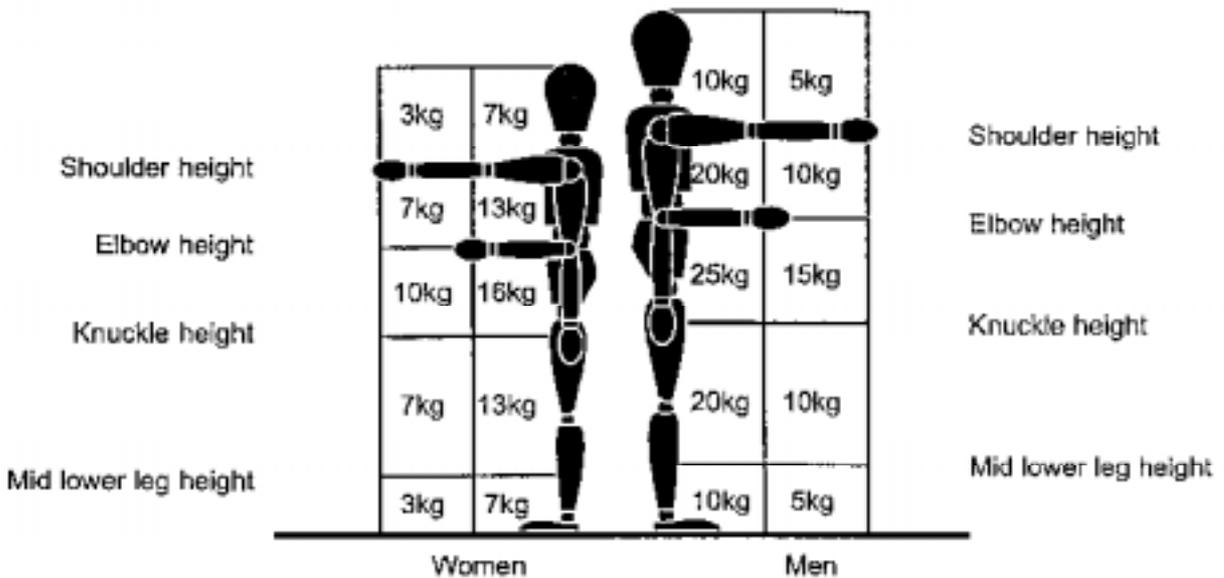


Figure 1 Lifting and lowering

8. These basic guideline figures for lifting and lowering are for relatively infrequent operations - up to approximately 30 operations per hour. The guideline figures will have to be reduced if the operation is repeated more often. As a rough guide, the figures should be reduced by 30% where the operation is repeated once or twice per minute, by 50% where the operation is repeated around five to eight times per minute and by 80% where the operation is repeated more than about 12 times per minute.
9. Even if the above conditions are satisfied, a more detailed risk assessment should be made where:
- (a) the worker does not control the pace of work;
 - (b) pauses for rest are inadequate or there is no change of activity which provides an opportunity to use different muscles;
 - (c) the handler must support the load for any length of time.

Guidelines for carrying

10. Similar guideline figures apply to carrying operations where the load is held against the body and is carried no further than about 10 m without resting. If the load is carried over a

longer distance without resting or the hands are below knuckle height then a more detailed risk assessment should be made.

11. Where the load can be carried securely on the shoulder without first having to be lifted (as for example when unloading sacks from a lorry) the guideline figures can be applied to carrying distances in excess of 10 m.

Guidelines for pushing and pulling

12. For pushing and pulling operations (whether the load is slid, rolled or supported on wheels) the guideline figures assume the force is applied with the hands between knuckle and shoulder height. The guideline figure for starting or stopping the load is a force of about 25 kg (ie about 250 Newtons) for men and about 16 kg (ie about 160 Newtons) for women. The guideline figure for keeping the load in motion is a force of about 10 kg (ie about 100 Newtons) for men and about 7 kg (ie about 70 Newtons) for women.
13. There is no specific limit to the distance over which the load is pushed or pulled provided there are adequate opportunities for rest or recovery.

Guidelines for handling while seated

14. The basic guideline figure for handling operations carried out while seated, shown in Figure 2, is 5 kg for men and 3 kg for women. These guidelines only apply when the hands are within the box zone indicated. If handling beyond the box zone is unavoidable, a more detailed assessment should be made.

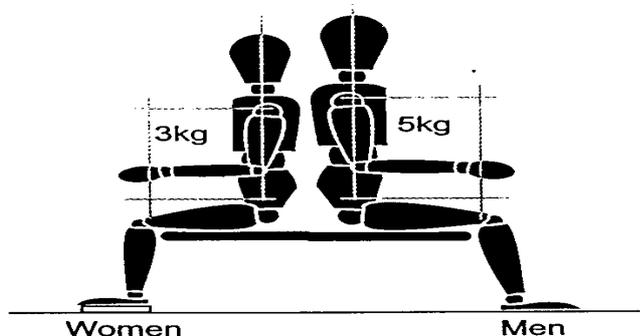


Figure 2 Handling while seated

Other considerations: Twisting

15. In many cases, manual handling operations will involve some twisting (see Figure 3) and this will increase the risk of injury. Where the handling task involves twisting and turning, therefore, a detailed risk assessment should normally be made. However, if the operation is relatively infrequent (see paragraph 8 of this Appendix) and there are no other posture problems then the filter can be used. In such cases, the basic guideline figures shown above should be reduced if the handler twists to the side during the operation. As a rough guide, the figures should be reduced by about 10% where the handler twists through 45° and by about 20% where the handler twists through 90°.

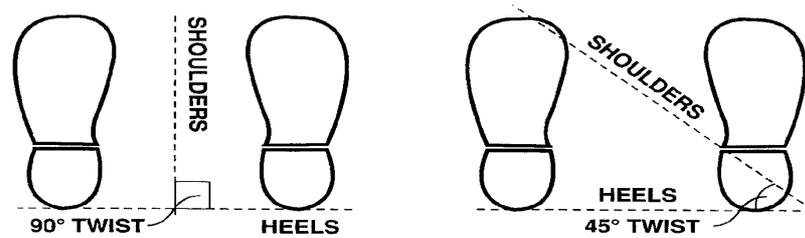


Figure 3 Assessing twist

Remember: The use of these guidelines does not affect the employer's duty to avoid or reduce risk of injury where this is reasonably practicable. The guideline figures, therefore, should not be regarded as weight limits for safe lifting. They are an aid to highlight where detailed risk assessments are most needed. Where doubt remains, a more detailed risk assessment should always be made. Even for a minority of fit, well-trained individuals working under favourable conditions, operations which exceed the guideline figures by more than a factor of about two may represent a serious risk of injury. Such operations should come under very close scrutiny.

FLOW CHART

Regulation 2(1)

Do the Regulations apply – ie does the work involve manual handling operations?

Yes

Regulation 4(1)(a)

Is there a risk of injury?

Yes/possibly

Is it reasonably practicable to avoid moving the loads?

No

Is it reasonably practicable to automate or mechanise the operations?

Yes

Does some risk of manual handling remain?

No

Regulation 4(1)(b)(i)

Carry out manual handling assessment

Yes/possibly

Regulation 4(1)(b)(ii/iii)

Determine measures to reduce risk of injury to the lowest level reasonably practicable

Implement the measures

Is risk of injury sufficiently reduced?

Yes

No

End of initial exercise

Regulation 4(2)

Review if conditions change significantly

How the follow the Manual Handling Operations Regulations 1992

Example of an assessment checklist

1. A suitable and sufficient risk assessment is required when hazardous manual handling is unavoidable. The assessment should identify where the risk lies and suggest an appropriate range of ideas for reducing the potential for injury. A checklist can help with this process by ensuring a systematic examination of all the potential risk elements.
2. An example of a basic checklist is provided on pages 12-15. Its use will help to highlight the overall level of risk involved and identify how the job may be modified to reduce the risk of injury and make it easier to do. It will also be useful in helping to prioritise the remedial actions needed. The checklist may be copied freely or may be used to help design your own assessment checklist.
3. The following notes are intended to assist in completing the checklist.

- (a) **Section A: Describe** the job. There is space available for a diagram to be drawn to summarise the job in a picture, as well as for a written description.
- (b) **Section B: Tick** the level of risk you believe to be associated with each of the items on the list. Space is provided for noting the precise nature of the problem and for suggestions about the remedial action that may be taken. It may also be useful to write down the names of the relevant people or groups in your organisation who you will wish to consult about implementing the remedial steps, for example managers, workforce trainers, maintenance personnel or engineers.

Some tasks may involve more than one operator, each with a different level of risk, depending on the exact nature of their duties. If you wish to use the same checklist for all of the operators involved, you can allocate a number (or other identifying mark) to each and use that against each tick (eg ✓¹; ✓^{1/2}; ✓^{1/2/3}; etc) or comment on the checklist form that relates to each particular operator.

- (c) **Section C: Decide** whether the overall risk of injury is low, medium or high. This section will help to prioritise remedial action if you have a large number of risk assessments to carry out.
 - (d) **Section D: Summarise** the remedial steps that should be taken, in order of priority. You may also wish to write in **(I)**, **(M)** or **(L)** alongside each entry to denote whether the action can be taken **(I)mmediately** or is a more **(M)edium-term** or **(L)ong-term** objective. The assessor's name and the date by which the agreed actions should be carried out should be recorded. It may also be useful to enter the target date for reassessment if this is appropriate.
4. When all the manual handling tasks have been assessed, the completed checklists can be compared to help prioritise the most urgent actions. However, there are likely to be several ways to reduce the risks identified and some will be more effective than others. Action on those that can be implemented easily and quickly should not be delayed simply because they may be less effective than others.
 5. A check should be carried out at a later date to ensure that the remedial action to remove or reduce the risk of injury has been effective.

6. A worked example of a risk assessment made using the checklist is given on pages 50-51 to show how the checklist might be used in practice.
7. The purpose of the checklist is to help bring out a range of ideas on how the risks identified can be avoided or reduced by making modifications to the load, the task, and the working environment. There are a number of people who may be able to help with suggestions, for example safety representatives, the quality management team within the organisation, and relevant trade associations. There is also a great deal of published information about risk reduction methods. *Solutions you can handle* and *A pain in your workplace*, both published by HSE, give examples that are relevant to situations across many sectors of industry (see Further Information). Trade journals, too, often contain information about products that can be used to help reduce the risk of injury from the manual handling of loads.

Manual Handling of Loads: Assessment Checklist

Section A – Preliminary

* Circle as appropriate

Job description: Factors beyond the limits of the guidelines?	Is an assessment needed? (ie is there a potential risk for injury, and are the factors beyond the limits of the guidelines?) Yes/No*
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If 'Yes' continue. If 'No' the assessment need go no further.

Operations covered by this assessment (detailed description): Locations: Personnel involved: Date of assessment:	Diagrams (other information):
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Section B – See over for detailed analysis

Section C – Overall assessment of the risk of injury? Low/Med/High*

Section D – Remedial action to be taken:

Remedial steps that should be taken, in order of priority:	
1	
2	
3	
4	
5	
6	
7	
8	
Date by which action should be taken:	
Date for reassessment:	
Assessor's name:	Signature:

TAKE ACTION ... AND CHECK THAT IT HAS THE DESIRED EFFECT

Section 3(12): Manual Handling

Section B – More detailed assessment, where necessary:					
Questions to consider:	If yes, tick appropriate level of risk			Problems occurring from the task (Make rough notes in this column in preparation for the possible remedial action to be taken)	Possible remedial action (Possible changes to be made to system/task, load, workplace/space, environment. Communication that is needed)
	Low	Med	High		
The tasks – do they involve: <ul style="list-style-type: none"> • holding loads away from trunk? • twisting? • stooping? • reaching upwards? • large vertical movement? • long carrying distances? • strenuous pushing or pulling? • unpredictable movement of loads? • repetitive handling? • insufficient rest or recovery? • a work rate imposed by a process? 					
The loads – are they: <ul style="list-style-type: none"> • heavy? • bulky/unwieldy? • difficult to grasp? • unstable/unpredictable? • intrinsically harmful (eg sharp/hot) 					
The working environment are there: <ul style="list-style-type: none"> • constraints on posture? • poor floors • variations in levels? • hot/cold/humid conditions? • strong air movements? • poor lighting conditions? 					
Individual capability – does the job: <ul style="list-style-type: none"> • require unusual capability? • hazard those with a health problem? • hazard those who are pregnant? • call for special information/training? 					
Other factors: Is movement or posture hindered by clothing or personal protective equipment?	Yes/No				

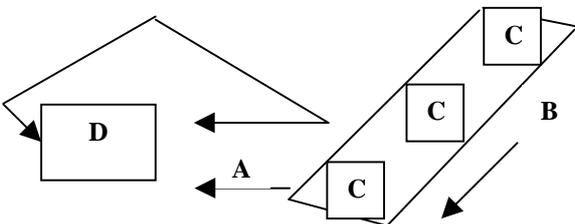
Worked Example of a Manual Handling of Loads: Assessment Checklist

Section A –Preliminary

* Circle as appropriate

<p>Job description: Pallet loading: boxes containing coiled wire</p>	<p>Is an assessment needed? (ie is there a potential risk for injury, and are the factors beyond the limits of the guidelines?)</p> <p style="text-align: center;">Yes No*</p>
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If 'Yes' continue. If 'No' the assessment need go no further.

<p>Operations covered by this assessment (detailed description): Operator lifts box, with hook grip, from conveyor, which 20 inches above the ground, turns, walks 3 metres and lowers box onto a pallet on the ground. Boxes are piled 6 high on pallet.</p> <p>Locations: Wire factory only</p> <p>Personnel involved: One operator</p> <p>Date of assessment: xx June 20xx</p>	<p>Diagrams (other information) a) Worker; b) Conveyor; c) 48 kg boxes of wire; d) pallet</p>  <p>Arrows show direction of conveyor belt and worker movements between conveyor and pallet</p>
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Section B – See over for detailed analysis

Section C – Overall assessment of the risk of injury? Low/Med/**High***

Section D – Remedial action to be taken:

<p>Remedial steps that should be taken, in order of priority:</p>	
<p>1 Review product design to reduce weight of load and improve grip.</p>	
<p>2 Review process in light of changes agreed in (1), particularly on customer requirements and transportation.</p>	
<p>3 Seek funding for magnetic lifting aid to help with transfer from conveyor to pallet.</p>	
<p>4 Seek funding for pallet rotating/height adjustment equipment.</p>	
<p>5 Operator to attend manual handling training.</p>	
<p>6 Raise conveyor height by 15 inches.</p>	
<p>7 Ensure full pallets are removed by pallet truck promptly.</p>	
<p>8 Operations manager to ensure no rushing on this job.</p>	
<p>Date by which action should be taken:</p>	<p>xx December 20xx</p>
<p>Date for reassessment:</p>	<p>xx December 20xx</p>
<p>Assessor's name: A N Onymous</p>	<p>Signature: A N Onymous</p>

Section 3(12): Manual Handling

Section B – More detailed assessment, where necessary:					
Questions to consider:	If yes, tick appropriate level of risk			Problems occurring from the task (Make rough notes in this column in preparation for the possible remedial action to be taken)	Possible remedial action (Possible changes to be made to system/task, load, workplace/space, environment. Communication that is needed)
	Low	Med	High		
The tasks – do they involve: <ul style="list-style-type: none"> • holding loads away from trunk? • twisting? • stooping? • reaching upwards? • large vertical movement? • long carrying distances? • strenuous pushing or pulling? • unpredictable movement of loads? • repetitive handling? • insufficient rest or recovery? • a work rate imposed by a process? 	✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓	✓	✓ ✓	1. Twisting when picking up the box. 2. Stooping when placing box on pallet and stooping when picking box up from the conveyor. 3. Sometimes extended reaching when placing boxes on pallet.	Remind operator of need to move feet (I). Adjust pallet height – Review availability of rotating, height adjusting equipment (I) and raised height of conveyor (M). Provide better information and instruction (I) Review mechanical handling equipment to eliminate manual lifting (I).
The loads – are they: <ul style="list-style-type: none"> • heavy? • bulky/unwieldy? • difficult to grasp? • unstable/unpredictable? • intrinsically harmful (eg sharp/hot) 	✓ ✓ ✓	✓	✓	4. Load too heavy. Is the weight of the load a problem for customers too? 5. Smooth cardboard boxes are difficult to grasp.	Review product and customer needs with a view to improving product design (L). Provide boxes with hand grips (M)
The working environment are there: <ul style="list-style-type: none"> • constraints on posture? • poor floors • variations in levels? • hot/cold/humid conditions? • strong air movements? • poor lighting conditions? 	✓ ✓ ✓ ✓ ✓	✓		6. Bad postures encouraged by obstruction when full pallets are not removed.	Introduce system to ensure full pallets removed promptly – Speak to Operations Manager (I).
Individual capability – does the job: <ul style="list-style-type: none"> • require unusual capability? • hazard those with a health problem? • hazard those who are pregnant? • call for special information/training? 		✓	✓ ✓ ✓	7. Operator has no history of back pain problems but clear signs of sweating and straining.	Consider job enlargement to introduce variety and allow for recovery time (M). Monitor to ensure no rushing (I). Speak to trainer about manual handling course (I).
Other factors: Is movement or posture hindered by clothing or personal protective equipment?	<div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; display: flex; align-items: center; justify-content: center; margin: 0 auto;"> Yes/No </div>				

**Factors to be considered
when making an assessment**

The tasks

Do they involve:

- holding or manipulating loads at distance from trunk?
- unsatisfactory bodily movement or posture, especially:
 - twisting the trunk?
 - stooping?
 - reaching upwards?
- excessive movement of loads, especially:
 - excessive lifting or lowering distances?
 - excessive carrying distances?
- excessive pushing or pulling of loads?
- risk of sudden movement of loads?
- frequent or prolonged physical effort?
- insufficient rest or recovery periods?
- a rate of work improved by a process?

The loads

Are they:

- heavy?
- bulky or unwieldy?
- difficult to grasp?
- unstable, or with contents likely to shift?
- sharp, hot or otherwise potentially damaging?

The working environment

Are there:

- space constraints preventing good posture?
- uneven, slippery or unstable floors?
- variations in level of floors or work surfaces?
- extremes of temperature or humidity?
- conditions causing ventilation problems or gusts of wind?

- poor lighting conditions?
- Individual capability
- Does the job:
- require unusual strength, height, etc?

create a hazard to those who might reasonably be considered to be pregnant or to have a health problem?
 - require special information or training for its safe performance?
- Other factors
- Is movement or posture hindered by personal protective equipment or by clothing?