



# ILFRACOMBE HARBOUR

## EDGE PROTECTION POLICY

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## 1.0 DOCUMENT CONTROL

This is document which is subject to triennial review and periodic amendment as required. Major changes will be issued as a new version with all minor amendments to that version annotated by a decimal point e.g. V2 will become V2.1, V2.2 etc.

Amendment proposals should be sent to the Harbour Master using the following means:

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## 1.1 RECORD OF REVIEW & AMENDMENTS

<i>Review (R) /Amendment (A)</i>	<i>Date</i>	<i>Description of changes</i>
<i>New version 4.0</i>	18/07/20	
<i>R &amp; A</i>	08/07/23	RISK AUDIT AMENDED. POLICY UPDATED.

## 2.0 INTRODUCTION

This policy sets out the Harbour Authority's approach to 'Edge Protection', paying particular attention to the requirements of the Health & Safety at Work Act 1974 (HSWA74) and Safety in Docks - Approved Code of Practice and Guidance 2014 (ACOP2014). [Safety in docks. Approved Code of Practice - L148 \(hse.gov.uk\)](https://www.hse.gov.uk/l148/)

A basic guiding principle is that if there is an edge from which someone on the harbour estate could fall then there needs to be some kind of edge protection or risk assessed justification for its absence. All personnel are considered at risk be they at work, a customer or a member of the public. Ilfracombe Harbour Authority will endeavour, wherever practicable, to treat the harbour estate as 'work premises' in the context of HSE advice and guidance. The HSE have indicated that a harbour authority has an obligation under Section 3 of the HSWA74 to take reasonably practicable measures to ensure the safety of those who visit and use the harbour.

## 3.0 FENCING

On the matter of providing fencing to the open edges, the HSE have said that a harbour authority needs to consider, among other things, whether the open sections are used for 'fishing' or 'dock', type operations, such as specific loading/unloading tasks, where fencing of the edge would not be practicable.

Ilfracombe Harbour Authority has undertaken an 'edge protection' audit/risk assessment at each of its distinct Quay areas, refer to section 6.0. It has determined the need for fencing or other control method using the following basic principles: -

- In areas where fish loading or dock processes are going on, the Loading and Unloading of Fishing Vessels Regulations 1988 and ACOP 2014, recognise the impracticability of protecting edges during certain operations. However, they do require edge protection in other specified circumstances.
- The HSE have indicated that a harbour authority has an obligation under Section 3 of the HSWA74 to take reasonably practicable measures to ensure the safety of those who visit and use the harbour. In areas where other vessels are mooring alongside, the physical type of mooring arrangement may dictate the practicality (or otherwise) of edge protection. However, the advice is to start from a presumption towards protection where there is a risk to the public/users.
- Access steps and similar infrastructure e.g. slipways may not require a second handrail on the open edge, where this would create a risk to vessels by becoming a submerged hazard at a higher tide level.

In all circumstances where there is no practical reason against edge protection it is the risk assessment that will need to provide guidance on reasonable control measures.

## 4.0 AREAS OF RISK

There are particular areas of risk which require careful consideration:-

1. Where people are routinely walking and passing through an area;
2. Where vehicles are parking close to the edge and it is foreseeable that the vehicle could drive over the edge, or that their occupants could fall once they get out of the vehicle;
3. Where people are likely to use an area in a manner which could put them at risk (e.g. a bar or restaurant seating area on the harbour side).

The protection decided upon may vary from physical barriers, to specific arrangements (e.g. parking restrictions). The purpose of risk assessment is to provide a reasoned judgment about what is sufficient to comply with the legal duty that rests with the harbour authority.

## 5.0 EDGE PROTECTION CONTROL METHODS

1. Solid 3 bar fencing
2. Horizontal chain fencing
3. Stone walls
4. Dangerous edge painted markings (yellow/white lines and wording)
5. Signage
6. Adequate lighting

## 6.0 LEGISLATION

- Health & Safety at Work Act 1974
- Management of Health & Safety at Work Regulations 1999
- The Construction (Health, Safety & Welfare) Regulations 1996
- Provision & Use of Work Equipment Regulations 1998
- Lifting Operations & Lifting Equipment Regulations 1998
- Personal Protective Equipment at Work Regulations 1992
- Manual Handling Operations Regulations 1992
- Shipbuilding & Ship Repairing Regulations 1960
- Health & Safety in Construction HS-G 150
- HSE CIS 10 document
- HSE Safety in Docks - Approved Code of Practice and guidance (April 2014)

### 6.1 BUILDING REGULATIONS

Whilst not specifically subject to building regulations it is considered that best practice would be for any new fencing to be carried out to the same standards. Building regulation part K, requires that all areas with a risk of people falling more than 600mm should be protected by a barrier of between 800mm and 1100mm dependent on location and environment.

They can be made from wood, metal or other suitable material, and they should be rigid, smooth and able to withstand the weight of people falling against them. The gap between the top rail and any intermediate rail should not exceed 470 mm.

There are exceptions to this general rule where it is not practicable. E.g. a working dockside where it is safer for loading and unloading if there is not a fence in the way (see sections 150 ~152 of ACOP 2014).

### 6.2 WORKPLACE (HEALTH, SAFETY & WELFARE) REGULATIONS 1992

Regulation 13 requires that people be protected by a substantial barrier of 1100mm in height from falling a distance likely to cause injury or falling into a substance which increases the risk of injury.

The following guidance in respect of edge protection has been extracted from the following document.

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#### 6.2.1 SAFETY IN DOCKS - APPROVED CODE OF PRACTICE AND GUIDANCE HSE APRIL 2014.

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#### 6.2.2 VEHICLE MOVEMENTS

61. In areas where ships are loaded or unloaded, vehicles should avoid manoeuvring close to unprotected quay edges.

62. Where the pattern of vehicle movement presents a foreseeable risk from vehicles running over the edge of a quay or other dangerous edge, suitable barriers should be provided and maintained.

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### 6.2.3 WORKING AT HEIGHT

113. Many of the activities carried out in docks could lead to a fall from height. These activities may be during routine operations, maintenance activities or unexpected or unplanned activities. In docks, the added hazard of working near water means a fall may lead to the risk of drowning.
114. Typical falls from height hazards in docks include:
- Working adjacent to open edges of docks, wharves etc.

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### 6.2.4 HOW THE RISKS CAN BE REDUCED

139. Use risk assessment as a means of identifying and determining the safe distance from open edges.

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### 6.2.5 FENCING AT DOCK EDGES

150. Except for straight and level quaysides, fencing should be provided at all dock, wharf, quay or jetty edges from which people may fall into water, and where they must pass within 1 m of the edge, or the configuration of the quay or the arrangement of walkways is such that they are more than ordinarily liable to fall over such an edge.
151. Fencing should be provided throughout every open side of narrow access ways, whether the fall would be into water or not.
152. These provisions do not apply to areas where there is no work activity being undertaken, subject to any foreseeable risk to members of the public.
153. Secure and adequate fencing should be provided where risk assessment has found this to be needed.
154. Particular consideration should be given to:
- Every break, dangerous corner and other part or edge of a dock, wharf, jetty or quay;
  - Open sides of a gangway, footway over a bridge, caisson or dock gate; and
  - Any other place where someone working or passing might fall.
155. Secure fencing should consist of an upper rail and an intermediate rail. In certain circumstances, e.g. the presence of children, a higher standard of protection will be required. The rails may where necessary consist of taut wire, taut chain or other taut material.
156. Where the work involves being within 1 m of an unprotected quay edge, people should wear suitable PPE, e.g. lifejackets or buoyancy aids.

157. Dock premises should be provided with adequate and suitable rescue and lifesaving equipment and means to escape from danger, e.g. handholds on the quayside at water level, ladders on quay walls and life-saving appliances.
158. Take into account the risks to lone workers.
159. Take into account the risks to members of the public where public access is possible or foreseeable, even if there is no dock work activity being undertaken (to comply with section 3 of the HSW Act).

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#### 6.2.6 RESCUE AND LIFE-SAVING FROM WATER

211. At jetties and quay edges where the edges are unfenced, means should be provided to help people to rescue themselves from drowning, and also provision for other people to rescue those in danger without endangering themselves. The means should include:
  - Handholds on the quayside at water level (at any state of the tide);
  - Ladders on quay walls;
  - Life-saving equipment.

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#### 6.2.7 FENCED QUAY EDGES

212. At jetties or quays where the edges are fenced throughout in accordance with paragraphs 150–152, the provision of life-saving equipment alone is sufficient unless:
  - The public has access to the quay edge; or
  - The duty holder is made aware of a risk of people falling over a fenced edge that is comparable to the risk of people falling over an unfenced edge (whether or not by means of risk assessment).
213. In these situations additional measures will be required such as handholds and/or ladders.

## 7.0 ILFRACOMBE HARBOUR AUTHORITY EDGE PROTECTION RISK ASSESSMENT AUDIT

Location	Edge Protection	Control Measure (if unfenced)	Pedestrian Traffic	Risk
Cove - East	Unfenced	<p>This is one of two Harbour working quay areas. There is a painted line on the ground identifying the 'Working Area' and also markings stating 'No Public Access/ No Parking'. Additionally there are, 'Working Area' signs erected throughout the area warning of the dangers.</p> <p>Vehicles reversing towards the quay edge are prevented from reversing over the quay edge by in situ pile fenders, which extend above the quay level.</p> <p>2 x Lifebelts, 1 at either end of the Working Quay.</p>	<p>High.</p> <p>This is one of the Harbour's main Car Parks and the SW Coast Path runs through the area. A public pathway is in place on the opposite side of the roadway to the working quay to provide pedestrians with a safe route.</p>	<p>The Harbour dries adjacent to these berths and the worst case scenario is a fall from significant height onto the harbour bed.</p> <p>Vehicles collecting catch/delivering ice from/to fishing vessels reverse over quay edge.</p>



Cove - West	Fenced	N/A	High	<p>Low risk of fall onto harbour bed.</p> <p>Gaps in the fence, to allow access to the berths, are protected with chain bridles and these are often left undone by those gaining access.</p>
Quay Road	Walled	N/A	High	<p>A 900mm wall protects the roadway from the quay edge.</p> <p>There are access points to ladders over the top of the wall for access to boats berthed alongside.</p>
Harbour – Main Slipway	Part fenced	The Slipway edge is only fenced for approx. one third of its length as required by the RNLI.	Medium	<p>Falling from the unfenced portion of the slipway is possible, particularly if moving aside on the uneven floor to allow a boat to launch/recover.</p> <p>The part fenced Slipway is designed to reduce the possibility of crush injuries to crews when launching/recovering the Lifeboat and to avoid navigational danger to the lifeboat and other users due to the submerged fencing at high tide.</p>

*Harbour – Old Slipway	Unfenced	Railings to be erected to prevent falls from unfenced edge	High	Users fall from the unfenced edge onto the hard sand below.
Old Quay Head - South	Unfenced	This is the other working quay area at the harbour. Fishing vessels require an open quay edge to be able to land their catch/equipment and for it to be safely collected for transportation off site.  1 x Lifebelt  Signage has been erected specifically warning of unfenced quay edges.	Medium  This Quay is a Grade II listed structure which is advertised as being open to the public. There is therefore a duty on the Harbour Authority to keep the Quay as safe as is reasonably practicable.	The Harbour dries adjacent to these berths and the worst case scenario is a fall from significant height onto the harbour bed.
Old Quay Head - North	Fenced	Access steps are unfenced but a handrail is fitted on the walled side of the steps	High  The Northern end of the listed Quay is much busier than the Southern end because it is the area where passengers board tripping boats and also where benches are situated.	Fall from steps into sea or onto harbour bed.
South Quay (Upper)	Fenced	N/A	High	There are 3 access gates along the Quay which are only opened to allow access to ships alongside. This is carried out under controlled

				circumstances by qualified Ships Crew/Harbour Authority staff.
South Quay (Lower) 1 <sup>st</sup> Landing	Part fenced	<p>When the tide drops below 7m the lower landing uncovers and the gangway/access to ships/boats alongside is moved to the new lower position. Access to the area is also controlled by gates with warning signage stating 'No Access to unauthorised personnel'.</p> <p>1 x Lifebelt (above on Upper Quay)</p> <p>All areas which have a drop onto other concreted steps/landings are fenced. The outer edge of the quay, where access to vessels is required, is unfenced.</p>	Low	Fall from quay edge into water or if tide height is below 3m onto harbour bed.
2 <sup>nd</sup> Landing	Fenced	<p>The lower landings at this berth are unfenced but a handrail is provided on the walled side of the berth.</p> <p>Access gate is fitted at the entrance to the lower landing stating No unauthorised access.</p>	Medium	<p>The steps area of this landing is fenced with removable chains. These chains are required to be removable to allow access from the landing to vessels alongside.</p> <p>There is a risk present as people sometimes undo chains to take part in the illegal act of</p>

				tombstoning and forget to reattach them afterwards.
Stonebench (Upper)	Fenced	N/A	High	<p>This area is fenced with a mixture of 3 bar fencing and removable chains. The chains are required to be removable to allow access from the landings to vessels alongside.</p> <p>2017 – This berth is the main Oldenburg cargo loading site and as such the removable fencing is taken away whilst loading operations are underway. A new risk assessment of this operation has identified the need to mark the quay edge so that those handling cargo are kept more aware of their proximity to the edge. Yellow hatching has been applied.</p> <p>There is a risk present as people sometimes undo chains to take part in the illegal act of tombstoning and forget to reattach them afterwards. The chains are checked on safety rounds early every morning.</p>
Stonebench (Lower)	Part fenced	The landings in this area uncover with the falling tide and full fencing is impractical given the exposed nature and	Low	The area adjacent to this berth only dries on a low spring tide. The most probable risk is a fall into water.

		<p>requirement for passenger loading.</p> <p>Access gate is fitted at the entrance to Stone Bench stating No unauthorised access.</p> <p>1 x Lifebelt</p>		
East Face	Part fenced	<p>All areas except the main ship berth are fenced including the area around the steps to protect from falls onto concrete steps.</p> <p>1 x Lifebelt</p>	Medium	Fall into the sea from up to 5m.
East Face Lower Flat		<p>The boat landing at this berth has been extended to provide low water springs access and there are no protecting fences. However, handrails have been installed on the walled side of the steps. There is one section of the steps where it is impractical to fit handrails and this needs to be managed by boat owners when embarking passengers.</p>		

*This Risk Assessment Audit has been reviewed by the Harbour Master and amended 08.07.2023*

