

## IRELAND. INSPECTION ACTIVITIES

Title of the inspection activities: **Refuse collection vehicles**

Duration of the inspection activities: **Four weeks in July 2024**

Aim of the inspection activities: **The primary objective was to improve safety standards related to RCV operations.**

Sector covered by inspections: **Waste collection**

The number of establishments inspected in the framework of the activities: **101 inspections**

The number of labour inspectors involved in implementing the inspection activities: **6 inspectors**

The number of persons involved in supervising the implementation of the inspection activities (including development of inspection documents and summarizing results of inspections): **mainly the Senior Inspector responsible for the Waste Team (1)**

Short summary of the outcome of the inspection activities: **Key findings included:**

- **High visibility clothing:** during the campaign a high level of compliance was observed regarding the wearing of high visibility clothing by RCV helpers. However, the campaign found that there is an opportunity for the industry to increase the use of Class 3 high visibility clothing, given that RCV helpers work close to moving vehicles.
- **RCV driver blind spots:** it was observed during the campaign that in many cases camera systems, mirrors and proximity alarms were in good condition, but there remains significant opportunity to retrofit extra aids to assist drivers particularly with reversing manoeuvres.
- **Man-riding footboards:** Overall the campaign found that footboard were in a poor condition. The issues identified by Inspectors included defective safety devices, damaged/unstable footboards, inadequate grip handles, and general non-conformance with the I.S. EN1501-1:2021.

Following the campaign, the HSA met with industry stakeholders to present the findings. The HSA highlight its concerns regarding the significant level of non-compliance, particularly regarding the inspection and maintenance of man-riding footboards.

To ensure transparency and raise awareness, the HSA also published a campaign finding note, summarising key issues identified during inspections and providing guidance on improving safety standards.

Work is ongoing with the RCV operators to enhance safety standards, with a strong focus on compliance and risk reduction. As part of this commitment, the HSA will conduct an RCV campaign again in 2025 to assess progress since the 2024 campaign and promote the importance of maintaining high safety standards across the industry.

No.	question	yes/no	comment
<b>Inspection activity</b>			
<b>A. Selecting priority areas for inspection</b>			
1.	What sources of information did you use in selecting the priority area for inspection?		<input checked="" type="checkbox"/> inspectorate's own database of workplace accidents <input checked="" type="checkbox"/> proposals of stakeholders – employer organizations <input checked="" type="checkbox"/> complaints; <b>Inspectorate has databased of compliances and this is used to plan inspection campaigns.</b>
2.	What was the main reason for selecting the inspection priority area?		<input checked="" type="checkbox"/> high rates of workplace accidents, including fatal and serious accidents <input checked="" type="checkbox"/> stakeholders' expectations
3.	What was defined as priority area?		<input checked="" type="checkbox"/> a particular hazard (a group of hazards) in a given sector
4.	What was the predominant aim of workplace inspections?		<input checked="" type="checkbox"/> to provide the inspected entities with information on legal requirements <input checked="" type="checkbox"/> to provide the inspected entities with information on how to ensure compliance with legal requirements <input checked="" type="checkbox"/> to enforce compliance with the law in the inspected entities <input checked="" type="checkbox"/> to achieve a measurable effect, e.g. in the form of reduced accident rate, morbidity rate, etc.
5.	How did you determine the number of entities to be inspected?		<input checked="" type="checkbox"/> the percentage of all registered entities where the problem determined as the priority area was expected to surface (range: <input checked="" type="checkbox"/> over 50 to 75 %;
6.	What was taken into consideration when determining the number of		<input checked="" type="checkbox"/> the number of inspectors carrying out inspection tasks in a given region;

	inspections to be carried out by individual field offices (regions):		
7.	Were IT tools used to identify the priority area in the described inspection campaign?	YES	<p>A brief description of IT tools:</p> <ul style="list-style-type: none"> <li>• <b>Internal ICT database.</b></li> </ul> <p>Type of data analysed to determine the priority area:</p> <ul style="list-style-type: none"> <li>• <b>Accidents, incidents, complaints and enforcement data.</b></li> </ul>
8.	Were IT tools used to identify the target group of inspected entities in the described inspection campaign?	YES	<p>A brief description of IT tools</p> <ul style="list-style-type: none"> <li>• <b>Internal ICT database.</b></li> </ul> <p>Type of data analysed to determine the target group of inspected entities:</p> <ul style="list-style-type: none"> <li>• <b>Internal data was review in terms of the waste collection operators, accident and incident notification and compliance history.</b></li> </ul>
<b>B. Determining the time span of inspection activities</b>			
9.	How was the breakdown of inspections planned? Were the inspections carried out:		
a)	evenly throughout the whole period of the planned activities	YES	<b>Inspectors mainly targeted waste transfer stations, where RCV operators were coming to tip their loads over a four week period.</b>
b)	as a series of intensified inspections in predetermined short periods of time	NO	
c)	other way (how?)	YES	<b>Inspectors were provide with locations of transfer stations, and advised to target as many different RCV operators as they could.</b>
10.	What was the average duration of a workplace visit conducted in the framework of the programme implementation (the time it took to complete inspection activities at an individual establishment)?		<input checked="" type="checkbox"/> within one day, between 2 and 4 hours;

11.	What was the average duration of the activities carried out in the office of the labour inspectorate (excluding the penal and administrative sanctions)?		<input checked="" type="checkbox"/> within one day, no longer than 2 hours;
<b>C. Selecting establishments for inspection.</b>			
12.	What criteria were used when selecting establishments for inspection?		<input checked="" type="checkbox"/> personal knowledge of labour inspectors who supervise particular workplaces (groups of workplaces) <input checked="" type="checkbox"/> workplace location criterion <input checked="" type="checkbox"/> sectoral criterion
13.	What sources of information were used when selecting establishments for inspection?		<input checked="" type="checkbox"/> inspectorate's own database
14.	Were IT tools used to select specific inspected entities in the described inspection campaign?		A brief description of IT tools <b>N/A.</b> Type of data analysed to select specific inspected entities: <b>Inspection, accident, complaints and enforcement date.</b>
<b>D. Provision of staff for carrying out inspections</b>			
15.	What group of inspectors was involved in the inspection activities?		<input checked="" type="checkbox"/> a select team of inspectors was involved based on their education and experience: <input checked="" type="checkbox"/> up to 10% of the staff <input checked="" type="checkbox"/> other (please specify). <b>Less than 3% of HSA staff but full Waste team.</b>
16.	How were inspectors prepared for the inspection activities (additional training)?		<input checked="" type="checkbox"/> additional training was provided by the same person (the same team) for all labour inspectors involved in the campaign; <input checked="" type="checkbox"/> other (please specify). <b>Campaign briefing was provided to inspectors and additional information was</b>

			<b>provided including a checklist and enforcement expectations.</b>
18.	What materials were at the inspectors' disposal during the activities?		<input checked="" type="checkbox"/> description of the inspection activities' objectives; <input checked="" type="checkbox"/> description of the ways in which to implement the activities (tasks to be completed); <input checked="" type="checkbox"/> checklists; <input checked="" type="checkbox"/> examples of reactive actions to be taken by inspectors upon identification of typical cases of non-compliance;
19.	Did labour inspectors use IT tools when carrying out activities within the described inspection campaign?	YES	<p>A brief description of IT tools:</p> <p><b>Onsite the inspectors use their inspectors notebook and checklist and then log the inspection on the internal ICT system when they return to the office.</b></p> <p>- IT tools were used :</p> <p><input checked="" type="checkbox"/> when summarizing and documenting the results of the inspection in a specific inspected entity</p> <p>They support the labour inspector in (please provide a short description):</p> <p>- summarizing and documenting the results of the inspection</p> <p><b>Internal ICT system used to log and record inspections on return to the office.</b></p>
<b>E. Involvement of other regulators, institutions, authorities for labour protection and social partners in the implementation process.</b>			
20.	Can other regulators, institutions, authorities for labour protection and social partners submit their proposals of inspection topics to the inspectorate's plan of work?	NO	

21.	Was the inspection activity the result of a proposal submitted by another regulator, institution, authority for labour protection or social partner?	NO	
22.	Was there any cooperation between the labour inspectorate and another regulator, institution, authority for labour protection or social partner?	NO	What was that co-operator? <b>No, but the Authority does meet with the waste industry twice a year to discuss accidents, incidents and compliance issues identified during inspections.</b>
25.	Are there any legal requirements obliging other regulators, institutions, authorities or social partners to make their data accessible to the labour inspectorate for inspection needs?		Please indicate institutions and the type of accessible data / information: <b>Data sharing agreements are in place with other regulators where cooperation is required.</b>
26.	Does the labour inspectorate have direct online access to information and data collected by other bodies, institutions and authorities?	YES	Please indicate institutions and the type of accessible data / information: <b>Statutory Companies Register is part of the HSA's new inspectorate ICT system.</b>
27.	What information obtained in the above manner was used for implementing the inspection campaign?		Please indicate the cooperating institutions and the type of data / information used in the described inspection campaign: <b>Establishing the list of locations to inspect.</b>
<b>F. Supporting inspection activities with training provided for employers or workers (combining inspection and educational activities)</b>			
28.	Were establishments covered by inspections provided with information or training <b>prior to the commencement of the inspection task</b> ?	YES	How was it provided? <b>Industry was advised of the campaign in advance.</b>  What percentage of establishments selected for inspections participated in training events (or other forms of provision of information)? <b>Over 70% of RCV operators engaged with the HSA in advance of the campaign.</b>
29.	Is the effectiveness of prior information or training activities	NO	



	taken into account when evaluating the results of the inspections?		
30.	Once the <b>inspection activity is completed</b> , are representatives of inspected establishments provided with recommendations and proposed corrective measures – in the form of guidance or training – regarding the identified compliance level in establishments operating in the field covered by inspection?		<p>What form do they have?</p> <p><b>The Authority provided an online webinar with the industry to summarise the findings of the campaign.</b></p> <p>What percentage of establishments selected for guidance/training (or other forms of communication activities) actually attended?</p> <p><b>Over 70% of the waste collection industry attended.</b></p>
<b>G. Monitoring the implementation of inspection activities</b>			
31.	Was the implementation of inspection activities in any way monitored and coordinated?	YES	<p>How many people were involved in monitoring and coordination of the inspection activity?</p> <p><b>Line management – mainly the Senior Inspector responsible for the Waste Team.</b></p> <p>What was the function of those persons in relation to labour inspectors who implemented the activity (fellow labour inspectors, immediate supervisors, national coordinator at the labour inspectorate's headquarters)?</p> <p><b>Ensure inspections/enforcement was carried out consistently and appropriately.</b></p>
32.	What was the scope of monitoring and coordinating actions regarding the inspection activity?		<p><input checked="" type="checkbox"/> assistance in solving problems: over the phone, via email, formally (official correspondence), other (what?)</p> <p><input checked="" type="checkbox"/> monitoring the implementation level of the developed quantitative plan</p>
33.	Were IT tools used to carry out monitoring and coordination activities as part of the described inspection campaign?	YES	<p>A brief description of IT tools:</p> <p>Inspectors use their notebook and checklist onsite.</p> <p>- IT tools were used to:</p>

			<input checked="" type="checkbox"/> monitoring the implementation level of the developed quantitative plan
<b>H. Communicating the information about inspection campaign and its results.</b>			
34.	Did you develop any plan to communicate the information about the inspection activities to:		
a)	Stakeholders in the sector covered by the inspection activity ?	YES	<p>If so, what information did the communication plan contain?</p> <p><b>After the campaign an online briefing was delivered for members of the Irish Waste Management Association a key stakeholder group in Ireland. A campaign findings information note was also published on the HSA website.</b></p> <p><a href="https://www.hsa.ie/eng/publications_and_forms/publications/work_related_vehicles/rcv_inspection_campaign_2024_-_findings.pdf">https://www.hsa.ie/eng/publications_and_forms/publications/work_related_vehicles/rcv_inspection_campaign_2024_-_findings.pdf</a></p>
b)	the general public?	YES	<p>If so, what information did the communication plan contain?</p> <p><b>A campaign findings information note was published on the HSA website.</b></p> <p><a href="https://www.hsa.ie/eng/publications_and_forms/publications/work_related_vehicles/rcv_inspection_campaign_2024_-_findings.pdf">https://www.hsa.ie/eng/publications_and_forms/publications/work_related_vehicles/rcv_inspection_campaign_2024_-_findings.pdf</a></p>
35.	What was the scope of information communicated to:		
a)	stakeholders in the sector covered by the inspection activity ?		<b>The briefings and information note summarising key issues identified during inspections and providing guidance on improving safety practices.</b>
b)	the general public?		<b>The information note summarising key issues identified during inspections and</b>



			<b>providing guidance on improving safety practices</b>
36.	How was the information about the inspection activities communicated to stakeholders and the general public?		<b>The campaign findings note was published on the HSA website.</b> <a href="https://www.hsa.ie/eng/publications_and_forms/publications/work_related_vehicles/rcv_inspection_campaign_2024_-_findings.pdf">https://www.hsa.ie/eng/publications_and_forms/publications/work_related_vehicles/rcv_inspection_campaign_2024_-_findings.pdf</a>
<b>I. Evaluating the results of the inspection activities. Evaluation methods and tools.</b>			
37.	How were the <b>results</b> of inspection campaign evaluated?		
a)	based on a checklist	YES	How are the results of inspections evaluated by means of a checklist? <b>Checklist data was analysed and interpreted which highlighted a high level of non-compliance in relation to the inspection and maintenance of the man-riding footboards.</b>
b)	based on the number of legal measures issued	YES	<b>The number of Reports of inspection issued, improvement notices and prohibition notices issued was review.</b>
38.	How was the information about the <b>effects</b> of inspection campaign obtained (e.g. about the elimination of irregularities, introduction of higher standards)?		
a)	information provided by the employer	YES	If so, what form did the information provided by the employer have? <b>Employers required to respond to enforcement activity by providing evidence of compliance.</b> Was the information provided by employers randomly verified by labour inspectors? <b>Yes</b> What is the employer's liability for providing false information? <b>It is an offence for an employers to provide false information to an inspector.</b>

b)	information provided by the labour inspector who conducted the next inspection at the workplace	YES	If so, what form did the information provided by the inspector have? <b>Inspection report, improvement notices and prohibition notices.</b>
39.	What performance indicators were used to evaluate the effectiveness of the inspection campaign?		Please list and briefly describe the indicators: <ul style="list-style-type: none"> <li>• <b>Compliance with the enforcement issued during the campaign.</b></li> <li>• <b>Feedback from stakeholders.</b></li> <li>• <b>Compliance at next RCV campaign in Q2 2025.</b></li> </ul>
40.	Were IT tools used to assess the effectiveness of the inspection campaign?		A brief description of IT tools: <b>Internal ICT system used to capture and record inspections.</b> - IT tools were used to: <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> provide compilations of data on the basis of which the inspection campaign was assessed</li> <li><input checked="" type="checkbox"/> formulate an assessment of the effectiveness of labour inspectors' activities within the inspection campaign</li> </ul>
41.	How were the project <b>effects</b> evaluated? <ul style="list-style-type: none"> <li>• <b>Compliance with the enforcement issued during the campaign.</b></li> <li>• <b>Feedback from stakeholders</b></li> </ul>		
a)	Was any final summary evaluation of the inspection task (inspection campaign) made?		If so, what was the scope of such evaluation? <b>Repeat campaign is to completed in Q2 2025.</b>
b)	Were partial assessments made during the inspection activity?	NO	
42.	How was the final document utilized in practice?		<b>The campaign findings were published on the HSA website for all stakeholders to view.</b> <b>Work is ongoing with the RCV operators to enhance safety standards, with a strong</b>

			<p>focus on compliance and risk reduction. As part of this commitment, the HSA will conduct an RCV campaign again in 2025 to assess progress since the 2024 campaign and promote the importance of maintaining high safety standards across the industry.</p>
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