

RECERTIFICATION, MAINTENANCE, INSPECTION, TRAINING GUIDANCE



HOW TO ENSURE EQUIPMENT IS SAFE TO USE AT ALL TIMES

Your Legal Duties

Recertification, inspection & training is much more than merely ticking a box and issuing a certificate. Depending on the equipment installed, some or all of the following regulations and standards may require you or your business to ensure continual compliance via recertification and training by a competent company/person on a scheduled basis.

- BS EN 7883:2005 Code of practice for the design, selection, installation, use and maintenance of anchor devices conforming to BS EN 795
- BS EN 365: 2004 Personal protective equipment against falls from a height
General requirements for instructions for use, maintenance, periodic examination, repair, marking and packaging
- Provision and Use of Work Equipment Regulations 1998
Maintenance – Regulation 5
Inspection – Regulation 6
Information and Instructions – Regulation 8
Training – Regulation 9
- Work at Height Regulations
Competence – Regulation 5
Inspection of Work Equipment – Regulation 12
Duties of Persons at Work – Regulation 14
Requirements for Personal Fall Protection Systems – Schedule 5
- Personal Protective Equipment at Work Regulations 1992 (as amended)
Compatibility of personal protective equipment – Regulation 5
Maintenance and replacement of personal protective equipment – Regulation 7
Information, instruction and training – Regulation 9
- Workplace (Health, Safety and Welfare) Regulations 1992
Maintenance of workplace, and of equipment, devices and systems – Regulation 5

If companies do not comply with legislation such as the above, they can be held responsible should an accident occur, particularly if the equipment is found to be faulty and/or uncertified.

Competence

Work at height is a specialised area of health & safety so it is important that you ensure you commission a competent company/person to assess the risks appropriately in accordance with the work at height hierarchy.

Competency can be demonstrated by certification as well as experience. In the case of the company it is essential that they are affiliated to a recognised industry representative group(s) so that they are updated regularly on changes to legislation and standards that relate to their line of business, particularly the services and products they offer.

A word of warning - many companies undergo inspections by their insurers as part of their indemnity, employer and premises insurance. Following conversations with insurers, the BSIF

(British Safety Industry Federation) now believes that these inspections do not validate risk assessments, operating method statements and equipment inspections as is believed by the companies, but simply evaluate the financial risk of a potential claim. Companies who believe their systems have been competently inspected by their insurers could be in difficulty when trying to defend themselves should an HSE inspection take place.

If in doubt about competency, EN365 sets out clear guidance as to required capabilities of the person carrying out periodic examination of systems as follows:

“This person should be capable of identifying and assessing the significance of defects, should initiate the corrective action to be taken and should have the necessary skills and resources to do so.”*

“A competent person may need to be trained by the manufacturer or his authorised representative on specific PPE or other equipment, e.g. due to its complexity or innovation, or where safety critical knowledge is needed in the dismantling, reassembly, or assessment of the PPE or other equipment, and may need to have that training updated due to modifications and upgrades.”

It is extremely rare for insurers to be health and safety specialists and to therefore have the competency outlined above to be able to carry out inspections.

Instructions for Periodic Inspections

When it comes to periodic inspections, instructions must be clear and concise and include:

- a) a warning emphasising the need for regular inspections and that the safety of those using the equipment depends upon the continued efficiency and durability of the equipment.
- b) a recommendation with regards to the frequency of inspections. This should take into account legislation, equipment type, frequency of use as well as environmental conditions and should include a statement that periodic inspections should be carried out at least every 12 months.
- c) a warning emphasising that periodic inspections must only be carried out by a competent person and in accordance
- d) an instruction when deemed necessary by the manufacturer, such as due to the complexity, innovation of the equipment or where critical knowledge is required for the dismantling, reassembly or assessment of the equipment (e.g. a retractable type fall arrester), that periodic inspections must only be conducted by the manufacturer or person/organisation authorised by the manufacturer.
- e) a requirement to check the legibility of the product markings.

** Resources would include the correct calibrated equipment to carry out the task, such as pull testers to complete a pull test of an eyebolt or swage end fitting of a life line system.*

NOTE: See Appendix A: for an example Periodic Inspection Procedure

Instructions for Repair

Where repair is permitted by the manufacturer, repair instructions must include a statement that repair should only be carried out by a competent person who has been authorised by the manufacturer, and that the repair procedure must be in accordance with the manufacturer's instructions.

Rescue Policy & Risk Assessment

You are legally required to have a Rescue Policy, Risk Assessment and the necessary rescue equipment in place for all work at height activities. Also you need to have fully trained personnel on site ready to use the equipment and complete a rescue should someone fall from your building.

This is a necessity in the case of "fall arrest" equipment installations and may also be required where "fall restraint" systems have been installed as there is the possibility of potential misuse or a risk that the wrong PPE combination is being used, leading to a "fall arrest" situation.

Safesite can provide full policy documentation, equipment and specialist training in this area if required.

Safesite's Recertification

Safesite is actively involved with key industry bodies such as the HSE, Construction Health & Safety Group, Work at Height Safety Association, Advisory Committee for Roof Safety and the British Safety Industry Federation, and ensures that its Recertification Engineers are fully trained on all relevant health & safety disciplines. This includes annual refresher training on each topic as well as product.

Safesite's recertification service commences long before our Engineer arrives on site. Once the appointment is scheduled all the required paperwork is issued prior to the recertification. This includes a full On Site Safety Operations Policy, Risk Assessment and Method Statement specific to the recertification. Our Engineers are fully briefed and provided with electronic copies of the project's initial installation details, including full access detail, drawings and PPE provided on site together with the names of those persons initially trained to use the system. In the case of new clients this information is requested prior to acceptance of the order for carrying out a recertification.

The Recertification

Once on site and upon completion of any required inductions and the Dynamic Risk Assessment, our Engineer will carry out an evaluation of the property to establish if anything has changed since the last recertification.

This evaluation also includes an assessment of the following:-

- a) Condition of access provision to work at height equipment.
- b) Permit to work issue and lone worker policy review.
- c) Cat ladder/loft ladder access to the recertification area.
- d) Additional equipment fitted at roof level that may now need protection.
- e) Equipment bolted to the Fall Protection System by third parties e.g aerials, lighting.
- f) Changes in building configuration/extensions that may change how the fall protection system operates.
- g) Additional tenant equipment fitted/tenant contractor access provision.
- h) Rescue Policy, plan and equipment review.

Once we are satisfied with the above we will commence the recertification in accordance with the Operations and Maintenance Manual for the installed product/system.

Systems/Equipment Inspected

- **Fall Protection Systems**

The Fall Protection System may be a guardrail, lifeline system, anchorage point, bespoke steelwork or ladder. All of these products were originally installed to specific standards and to protect particular areas.

Fall Protection Systems can be removed, damaged and tampered or, in some cases, even deployed. These systems need to be certified continually in order to ensure that they are safe to use at all times.

During the recertification we will assess the system in line with current regulations and provide a full electronic report. Any recommendations/remedial repairs will be noted on the report. Where possible, small repairs will be carried out by our Engineer whilst on site.

- **PPE**

In some cases PPE is required for use with the Fall Protection. Where more than one piece of PPE is being used, it is essential that the different items are compatible with one another. If a combination of PPE is being used, the person selecting that combination is seen as the 'manufacturer' and so the responsible person.

When it comes to specifying PPE equipment, this should only be done by a competent PPE specialist. Over the years we have inspected combinations of PPE which would certainly have caused severe injury to the user if they had fallen from a building.

Records and Inspection logs

Once the recertification has been completed, Safesite will send an electronic recertification/inspection report together with the certificate for the equipment. These records are also stored on our servers for future reference and are reviewed before the following year's recertification expires. All training certificates are also sent to you electronically and again stored on our servers as a back up for you.

Training

It is vital that everyone using the fall protection system is adequately trained to do so. This includes your employees and also persons not in your employ, but deemed to be under your control (Contractors). It is essential that all those using the fall protection system are also aware of the correct PPE combination of equipment. Extreme care must be taken in the case of fall restraint systems as the wrong length rope grab could prove fatal.

Frequency

The frequency of recertification/inspection/training will depend upon a number of factors. As a minimum we recommend recertification of equipment should take place every twelve months dependent upon frequency of use and environment.

Training needs to be scheduled appropriately as must training for new members of staff or contractors. The frequency of staff/contractor turnover will also have a bearing on the frequency of training.

Conclusion

Your responsibility to providing a safe working environment does not simply mean installing work at height safety solutions. Once equipment has been installed it must be maintained at least once a year by a competent company/person and all those using the equipment must have the appropriate level of instruction, supervision and training.

If something does happen and there is a fatality, your company's health and safety culture will be examined thoroughly under the Corporate Manslaughter Act.

For further information or to discuss your recertification requirements please contact our Recertification Division on **Tel: 01293 529977** or email: recertification@safesite.co.uk

APPENDIX A

Periodic Inspection Procedure

The following flowchart from prEN795:2011 provides an example of periodic inspection procedures for lifeline/anchor systems.

