

HEIGHT SAFETY EQUIPMENT MAINTENANCE, INSPECTION, RECERTIFICATION & TRAINING GUIDANCE

This guide focuses on the maintenance, inspection and testing of height safety equipment including fall arrest systems & horizontal lifeline systems.



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ENSURE YOUR EQUIPMENT IS SAFE TO USE

Your Legal Duties

Inspection and Recertification is an essential part of ownership and much more than a box ticking exercise resulting in the issuing of a certificate. Depending on the equipment installed, 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 regular 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

• **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

None compliance with legislation such as the above, will mean that businesses and individuals can be held responsible should an accident occur, particularly if the equipment is found to be faulty and/or uncertified.



Competence

Competency can be demonstrated by in date certification as well as experience, but generally both. In the case of a company it is essential that they are participating members of a recognised industry representative group(s) This ensures that they are up to date on changes to legislation and standards that relate to their business activity, including services and products that they offer. CSS Worksafe are members of BSIF, Personal Safety Manufacturers Association, Chair of BSIF Height Safety Group and committee members of BSI PH5, European Standards Group for Height Safety Standards.

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

Inspection by insurance Companies

Companies may have inspections undertaken by their insurers as part of their indemnity requirements or for annual renewals.

For some considerable time there have been concerns regarding so called inspections of height safety equipment by insurance company engineers. The BSIF (British Safety Industry Federation) have had conversations with several insurers regarding their competence to undertake in depth inspections and re certification of fall protection equipment and systems and now conclude that these inspections do not validate risk assessments, operating method statements and equipment inspections as might be understood by the insured, but simply evaluate the financial risk of a potential claim.

It is extremely rare for insurers to be health and safety specialists and to therefore have the competency and manufacturers consent or qualification to be able to carry out inspections.

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.”

Instructions for Periodic Inspections BSEN365 2004

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 a 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.

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

It is a legal requirement to have a Rescue Policy, Risk Assessment and a rescue plan and 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 and be suspended or injured.

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. i.e. too long a lanyard that allows a fall to take place where none is intended.

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

CSS Worksafe Recertification

CSS Worksafe is actively involved with key industry bodies such as the HSE, British Safety Industry Federation, BSIF Height Safety Group and BSI, PH5 European Standards Group and ensures that its Recertification Engineers are fully trained on all relevant health & safety disciplines and equipped for all eventualities.

Prior to commencement on site CSS Worksafe supply, Risk Assessment and Method Statement specific to the task in hand, as well as training and certification information for our engineers.

To avoid confusion, our Engineers are fully briefed and provided with copies of the project's initial installation details, including full access detail, drawings and PPE provided for use with the systems on site. AS our engineers are long term employees, it is possible that they will have been involved in the initial installation and have firsthand knowledge of your site.



Recertification

Engineers will adhere to all site specific safety requirements as indicated at the site safety induction our and will carry out a Dynamic Risk Assessment and evaluation of the property to establish if anything has changed since the last site visit.

This evaluation also includes an assessment of the following:-

- a) Permit to work issue and lone worker policy review.
- b) Access provision to work area.
- c) Additional equipment fitted at roof level that may interfere with the installation.
- d) Equipment attached to the Fall Protection System by third parties such as aerials and lighting etc.
- f) Structural changes to the area i.e. extensions that may change how the fall protection system operates.
- e) Additional tenant equipment fitted/tenant contractor access provision.
- f) Rescue Policy, the rescue plan and equipment review.

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

Fall Protection Systems/Equipment Inspections

The Fall Protection System may be a collective measures, such as guardrail or PPE, such as harnesses and lanyards, lifeline systems, anchorage point, bespoke steelwork or ladders.

Fall Protection Systems can be removed, damaged and tampered with, or, in some cases, even deployed through use, or indeed misuse.

Installed systems need to be inspected regularly (every 12 months minimum) subject to frequency of use or the environment they are used or installed in and will be re certified in order to ensure that they are safe to use at all times and manufacturers warranties are upheld.

During the recertification we will assess the system in line with current regulations and provide a full electronic report on completion along with new certification where appropriate. Any recommendations/remedial repairs will be noted on the report. Where possible small repairs will be carried out by our Engineers whilst on site. All additional requirements will be notified and a associated costs given in writing.

PPE

In most cases PPE is required for use with the Fall Protection system. 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 (a system), the person selecting that combination is seen as the 'manufacturer' and so the responsible person for making the correct choice.

When it comes to specifying PPE equipment, this should only be undertaken by a competent Person with sufficient knowledge and experience. We are happy to assist you with this process, as the wrong choice can prove catastrophic.

Records and data bases

Once the recertification has been completed, CSS Worksafe will send an electronic recertification/inspection report together with the certificate for the equipment (if passed inspection). These records are also stored on our client database for future reference and are reviewed before the following year's recertification expires, at which point a reminder will be sent out.

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. ***If unsure please ask for an assessment.***

Training

It is essential that everyone involved with work at height and particularly those using fall protection systems and equipment are adequately trained and qualified. This also includes persons deemed to be under your control (i.e. Contractors). It is essential that all those using fall protection systems are able to make the correct selection of such items as harnesses, lanyards, safety ropes and grabs, fall arrest blocks and rescue equipment and are aware of rescue procedures.

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.

For further information or to discuss your recertification requirements please contact our Maintenance and Certification Manager on **Tel: 01527 873262** or email:

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