

The Work at Height Safety Association

Technical Guidance Note 3

“Guidance on inspecting personal fall protection equipment”

A series of informative notes for all industries involved with work at height or rescue.

The Work at Height Safety Association (WAHSA) is a UK trade association for manufacturers of equipment for work at height and rescue. This series of guidance notes is published by WAHSA to provide information on topical issues relating to work at height which may be a source of confusion, or where other information may be lacking. The information provided is only intended to apply within the UK.

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WAHSA technical guidance note no. 3

Guidance on inspecting personal fall protection equipment

Introduction

This leaflet is intended to provide guidance on the interpretation of Regulation 12 of the Work at Height Regulations, 2005 (WAHR).

It offers general advice on inspection regimes for personal equipment used to provide protection against falls from a height and is intended to give information on the frequency, procedure and level of detail of inspection and the type of records which must be kept.

It does not give information about the criteria for inspecting individual products, methods of care or cleaning, or information about storage and or maintenance. Employers should consult the manufacturer and/or supplier of the equipment for any product-specific inspection requirements.

This leaflet does not deal with requirements for anchor points, which are discussed in leaflet no. 1

Legal requirements for inspection

The WAHR places duties on employers and other duty holders concerned with managing or carrying out work at height.

12. - (1) This regulation applies only to work equipment to which regulation 8 and Schedules 2 to 6 apply.

Regulation 12 only applies to equipment which is not an existing place of work. This guidance is intended to cover only personal protective equipment (PPE).

In addition to the requirements in WAHR, there are also requirements in BS EN 365: 2004 and BS 8437 which contain both general and specific information on periodic inspection of fall protection equipment.

Practical reasons for inspection

There is a wide range of possible causes of degradation of materials used in fall protection equipment (including abuse, general wear and tear, edge/surface damage, ultraviolet light, dirt, grit, chemicals, dropping, subjection to excessive loading, falls).

Textiles deteriorate slowly with age regardless of use. However, the most common cause of strength loss in textile equipment is through abrasion (either by grit working into the strands or by chafing against sharp or rough edges) or by other damage such as cuts.

Textile equipment that has suffered a high shock load (impact force), or has had a load dropped on to it, should be scrapped.

Recent research has highlighted that there is no well-defined boundary (e.g. usable life) separating equipment that is safe and that which is not.

The safest course of action is to scrap any component about which there is any doubt. Proof load testing should not be carried out on textile components or (usually) on components used in conjunction with textile components (e.g. rope grabs).

Obsolescence

Some equipment is given a lifespan or obsolescence date by the manufacturer. Where the manufacturer does not give an obsolescence date, it is advisable to set a period after which such equipment should

no longer be used. The information supplied by the manufacturer for the component should be referred to when deciding on the length of this period.

Equipment that has reached such a limit, which has not already been rejected for other reasons, should be withdrawn from service and not used again, unless or until confirmed by a competent person, in writing, that it is acceptable to do so.

Inspection regime

Employers should establish a regime for the inspection of equipment that is drawn up by a competent person. The regime should include:

- the equipment to be inspected (including their unique identification);
- the frequency and type of inspection (pre-use checks, detailed, interim inspection);
- designated competent persons to carry out the inspections;
- action to be taken on finding defective products;
- means of recording the inspections;
- training of users
- a means of monitoring the inspection regime to verify inspections are carried out accordingly.

It is essential that the person carrying out any inspection is sufficiently independent and impartial to allow them to make objective decisions, and has appropriate and genuine authority to take the appropriate action.

This does not mean that competent persons must necessarily be employed from an external company, although many WAHSA members offer both inspection services and training in the inspection of their products.

EN 365

4.4 d

When deemed necessary by the manufacture ,eg due to the complexity or innovation of the equipment ,or where safety critical knowledge is needed in the dismantling ,reassembly, or assessment of the equipment,(e.g. .retractable type fall arrester),an instruction specifying that the periodic examinations shall only be conducted by the manufacture or by a person or organisation authorised by the manufacturer see EN 365 4.4b EVERY 12 MONTHS

Competent person

EN 365 2004 for periodic examination

Person who is knowledgeable of the current periodic examination requirements, recommendations and instructions issued by the manufactures applicable to the relevant component, subsystem or system

Note 2

A competent person may need to be trained by a manufacture or his authorised representative on specific PPE or other equipment eg,due to its complexity or innovation ,or where safety critical knowledge is needed in the dismantling ,reassembly or assessment of PPE or other equipment ,and may need to have that training updated due to modification

And upgrades

Frequency and types of inspection

Equipment should be subject to different levels of inspection at different times through its use:

- pre-use checks;
- detailed inspections
- interim inspections (if necessary)

Pre-use checks

where the safety of work equipment depends on how it is installed or assembled, it is not used after installation or assembly in any position unless it has been inspected in that position.

These checks are essential and should be carried out each time, before the product is used. Pre-use checks should be tactile and visual. The whole item should be subject to the check. A visual check should be undertaken in good light and will normally take a few minutes.

work equipment exposed to conditions causing deterioration which is liable to result in dangerous situations is inspected -

*(a) at suitable intervals; and
(b) each time that exceptional circumstances which are liable to jeopardise the safety of the work equipment have occurred,*

to ensure that health and safety conditions are maintained and that any deterioration can be detected and remedied in good time.

Detailed inspections

These are formal, comprehensive inspections that should be carried out from time to time at intervals as set out in the employer's inspection regime. There should be a detailed inspection before first use and then at least every six months or after circumstances which might jeopardize safety have occurred

For equipment which is used frequently it is suggested that the frequency of detailed inspections is increased to at least every three months, particularly when the equipment is used in arduous environments (e.g. demolition, steel erection, scaffolding, steel masts or towers with sharp edges).

Interim inspections

These are also comprehensive inspections and may be needed to supplement pre-use checks and detailed inspections. Interim inspections will be required where the employer's risk assessment has identified a risk that could result in significant deterioration, affecting the safety of the equipment before the next detailed inspection is due.

The need for and frequency of interim inspections will depend on use. In determining what is a suitable interval, factors such as whether items are subject to high levels of wear and tear or contamination should be considered.

Examples of situations where they may be appropriate include: risks from aggressive working environments involving any type of contamination from chemicals, paint, grit blasting, acids or alkalis.

The results of both detailed inspections and the interim inspections should be recorded.

(6) the result of an inspection under this regulation is recorded and, subject to paragraph (8), kept until the next inspection under this regulation is recorded.

Keeping suitable records

Apart from any legal considerations, good record keeping is essential to establish the age and conditions of use for products. All products must therefore be marked individually to allow the history of the product to be recorded.

Products must only be marked in ways that will not cause damage or reduce their effectiveness. In particular, textile products must not be indelibly marked on load bearing areas unless it has been ascertained that the marking agent will not cause damage to the textile.

(7) A person carrying out an inspection of work equipment to which paragraph (4) applies shall

—

(a) before the end of the working period within which the inspection is completed, prepare a report containing the particulars set out in Schedule 7; and

(b) within 24 hours of completing the inspection, provide the report or a copy thereof to the person on whose behalf the inspection was carried out.

(8) An employer receiving a report or copy under paragraph (7) shall keep the report or a copy thereof -

(a) at the site where the inspection was carried out until the ... work is completed;

(b) thereafter at an office of his for 3 months.

Moving equipment from one place of work to another

Certificates of inspection should always be available with a product. WAHR states that is a product should not be used if:

(a) leaves his undertaking; or

(b) if obtained from the undertaking of another person, is used in his undertaking,

unless it is accompanied by physical evidence that the last inspection required to be carried out under this regulation has been carried out.

Withdrawing equipment from Use

If there is no evidence that equipment has been inspected by a competent person within the last six months and/or identification marks are not present, it should be withdrawn from use and passed to a competent person for a detailed inspection to decide on further action.

It is important that there is a quarantine procedure for ensuring that defective or suspect equipment that has been withdrawn from service does not get back into use. Any equipment considered to be defective should be permanently broken up before being disposed of, to ensure that it cannot be retrieved and used again.

Equipment that has been used to arrest a fall should never be reused. It should be withdrawn from service immediately and destroyed or returned to the manufacturer.

References

The Work at Height Regulations 2005

Issues surrounding the failure of an energy absorbing lanyard SIR59 HSE Books 2001 ISBN 0 7176 2256 8

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

HSE - INDG 367 – Inspecting fall arrest equipment made from webbing or rope