

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.

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WAHSA technical guidance note no. 3

Guidance on inspecting personal fall protection equipment

Introduction

This guidance note gives guidance on the interpretation of Regulation 12 of the Work at Height Regulations, 2005 (WAHR) which sets out duties for the inspection of work equipment.

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 inspections, as well as 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 Technical Guidance Note 6.

1.0 What are the legal requirements for inspection?

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

Regulation 12 applies only to the inspection of work equipment to which Regulation 8 and Schedules 2 to 6 apply. This guidance will only cover personal protection equipment (PPE) associated with Schedule 5 personal fall protection systems.

In addition to the requirements in WAHR, there are also requirements for inspection in BS EN 365: 2004, recommendations in BS 8437 and Health & Safety Executive Publication INDG367. All contain both general and specific information on periodic inspection of fall protection equipment.

2.0 What are the practical reasons for carrying out inspections?

There are a wide range of possible causes of degradation of the materials used in fall protection equipment, including abuse, general wear and tear, edge/surface damage, ultraviolet light, dirt, grit, chemicals, excessive loading and falls of the user.

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. Any equipment showing signs of damage such as this should be scrapped. Textile equipment that has suffered a high shock load (impact force), or has had a load dropped on to it, should also be scrapped.

Recent research has highlighted that there is no well-defined boundary (e.g. usable life) separating equipment that is safe to use 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).

3.0 Longevity and obsolescence of personal protection equipment.

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 date 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 the manufacturer, or a competent person trained and authorized by the manufacturer, in writing, that it is acceptable to use.

4.0 Inspection and checks

It is essential that the person carrying out any inspection is competent to do so. In the case of pre-use checks, this is likely to be the user, however detailed and interim inspections should be carried out by somebody sufficiently independent and impartial to allow them to make objective decisions, and have 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.

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 inspection, interim inspection and servicing)
- 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.

4.1 Pre-use Checks

These checks are essential and should be carried out each time, before the product is used. Pre-use checks should be tactile and visual and 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. The function of items such as connectors, anchor line devices, buckles on harnesses, descending and ascending devices and retractable type fall arresters should also be checked.

4.2 Detailed Inspection

These are formal, comprehensive inspections that should be carried out at suitable intervals based on an assessment of the equipment type, frequency of use and environmental conditions. BS EN 365: 2004 recommends detailed inspection at least every 12 months. BS 8437: 2005 and INDG367 recommend intervals not exceeding 6 months, or 3 months where the equipment is used in arduous conditions e.g. demolition, steel erection, scaffolding, steel masts or towers with sharp edges.

A detailed inspection should also be carried out before first use and after circumstances have occurred which are liable to jeopardize safety e.g. after the equipment has arrested a fall.

The results of the detailed inspection prior to first use, and subsequent detailed inspections should be recorded. The record of inspection should be kept until the next inspection is recorded.

4.3 Interim Inspections

These are additional to 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 integrity of the equipment before the next detailed inspection is due.

The need for and frequency of interim inspections will depend on the use and environment. Examples of situations where they may be appropriate include: arduous working environments involving paints, chemicals, grit blasting operations and acidic or alkaline environments.

The results of interim inspections should be recorded and the record of inspection kept until the next inspection is recorded.

4.4 Servicing

Some equipment, (such as retractable fall arresters and controlled rate descenders), must be serviced, inspected and re-certified by the manufacturer, or an approved company, at least every 12 months, or less if deemed .

BS EN 365: 2004 Clause 4.4(b) states that "Where deemed necessary by the manufacturer e.g. 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 manufacturer or by a person or organisation authorised by the manufacturer" shall be included with the products.

5.0 Who is a competent person?

BS EN 365: 2004 for periodic examination defines a competent person as a "person who is knowledgeable of the current periodic examination requirements, recommendations and instructions issued by the manufacturers applicable to the relevant component, subsystem or system".

BS EN 365: 2004 Clause 3.3 also states "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".

Note: A competent person may need to be trained by a manufacturer or their authorised representative on specific PPE or other equipment (as detailed in Section 4) and may need to have that training updated due to modification and upgrades.

6.0 Keeping suitable records of inspections

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.

6.1 Moving equipment from one place of work to another

Certificates of inspection should always be available with a product. Equipment should not be issued or used without physical evidence that the last inspection has been carried out. Physical evidence can take the form of a tag, label or document.

7.0 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 immediately and passed to a competent person for a detailed inspection to decide on what further action should be taken.

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.

8.0 References

The Work at Height Regulations 2005

SIR59 HSE Books 2001 ISBN 0 7176 22568 *Issues surrounding the failure of an energy absorbing lanyard*

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*

BS 8437: 2005 + A1: 2012 *Code of practice for selection, use and maintenance of personal fall protection systems and equipment for use in the workplace*