



Request for Confirmation of the Operational Approach Proposed by the Safety Assessment Federation (SAFed) Members for the Engineering Inspection, Testing and Certification Industry in Response to Covid-19

The continued operation of the Engineering Inspection, Testing and Certification Industry is essential to ensure the safety of health care settings as well as any continued activities of UK PLC.

SAFed Member Companies provide statutory examinations and inspection services to national legislation standards (referred to hereafter as inspections). The outbreak of Covid-19 has already created site access limitations, and it is expected that the potential for limited site access, along with resource availability to complete these inspections, will worsen as government guidance and restrictions develop.

The purpose of this brief is to seek confirmation, or further discussion, of SAFed member companies proposed approach to ensure compliance, and therefore safety, of UK plant and equipment.

The brief provides information for the HSE or other appropriate Government body to then provide confirmation or response to the following:

- Designation of the Engineering Inspection, Testing and Certification Industry as a body of key workers.
- Agreement of the critical industry sectors to ensure provision of focused support, and the approach to pragmatic prioritisation of work as and when the impact of reduced resource to complete inspections is realised.
- Further advice and guidance on protecting the health and safety of the work force conducting inspections.

Designation of the Engineering Inspection, Testing and Certification Industry as a body of key workers.

The service our member companies provides is driven by legislation, namely but not exhaustive of PUWER, PSSR, LOLER and COSHH. The examinations and inspections completed are statistically proven to ensuring and improving the safety of plant and equipment and the health and welfare of operatives.

The HSE has provided information and guidance, and within this there is no derogation of statutory responsibilities. SAFed member companies are contracted on behalf of their clients to complete these statutory duties, and consider their work essential, and so will be continuing business as normal within the current guidance and limitations as presently set by the HSE and Government.

The Government statement yesterday highlighted 'key workers' and that support would be provided to allow key workers to attend their work setting.

We seek that our member companies are given key worker status, as the removal of the examination and inspection function is certain to introduce accidents and incidents, or simply the inability to use plant and equipment due to overdue statutory inspections in the sectors that most need it.



Agreement of the critical industry sectors to ensure provision of focused support, and the approach to pragmatic prioritisation of work as and when the impact of reduced resource to complete inspections is realised.

SAFed member companies are currently working to their agreed schedules with clients and are monitoring the cases where site access is refused due to Covid-19 and results in a 'Plant Not Available' (PNA) designation.

The immediate issues are for the clients in that if they refuse site access, and therefore an inspection is not conducted when due, the legislation dictates that the equipment should not be used until this inspection is complete.

For example, access is denied to conduct an inspection on a passenger lift in a hospital, and so it is reported as 'PNA', and presents the following:

- For the client – that the equipment, unless the inspection can be completed before the due date, should not be available for use.
- For the member company – the inspection will need to be rescheduled creating a backlog of inspection activities.

The same would apply for pressure systems, however, we appreciate there is a process to allow for deferrals, however, these are to be requested prior to the equipment becoming overdue, and can only occur once, i.e. some equipment may already be subject to a deferral and so this is not an option.

Whilst the HSE have suggested a pragmatic approach, which includes addressing areas where there are vulnerable people such as hospitals, as well as conducting inspections earlier, there is not a definitive approach presently to which sectors are critical and should be prioritised.

SAFed member companies have identified and categorised their industry sectors considering their criticality as high, medium and low as below. It is noted that the list is not exhaustive, and aims to provide clarity between sectors rather than a detailed list of individual areas.

- High priority – facilities that are crucial for the treatment / containment of the virus and the general infrastructure of the country, this includes:
 - o health care settings (hospitals, GP practices and essential NHS hubs) and pharmacies
 - o services and utilities (power stations, water, gas)
 - o retail, manufacturing and transport serving essential provisions (food, medical supplies)
 - o maintenance and repair serving essential provision, as above
 - o social / economically vital sites and services (construction, large employers)
 - o essential commerce
- Medium priority – Areas where there are secondary risks with equipment being unavailable, such as nursing / care homes, dental care and non-essential medical practices, and residential high-rise flats.
- Low priority – Areas where the services are recreational and non-essential, or are closed due to government rules, such as residential homes, gyms / recreation centres, shops other than supermarkets and pharmacies, theatres.

The agreement of critical sectors and the ability for our member companies to prioritise their efforts would extend further to the anticipated future issues to address the expected backlog of inspections



created from access limitations and compounded as a result of resource availability from the expected absence due to illness or isolation at both member companies and client sites.

Our member companies are considering their approach as the burden of inspections increases, and the resource available to complete the inspections decreases. For example, during stage 1 when there is still high resource availability within the member companies, as a minimum high priority work will be completed, and medium and low priorities will be completed where possible. As resource decreases, there would be reduction in the amount of low and medium priority work completed, until the extreme situation where only high priority and profound plant and equipment with no option for alternative measures, for example NDT on maintenance repairs, and inspection of essential pressure systems, such as compressed air and medical gases.

We seek confirmation of the critical sector prioritisation as presented above, or discussion to agree a definitive list of critical sectors, that will ensure the focus of efforts of the member companies both immediately and as any further restrictions are realised, either created by HSE / Government guidance (location and movement of personnel, closures) or by reduction in resource available (illness, self-isolation, care-givers) to conduct examination and inspections.

In addition, HSE / Government confirmation of this prioritised approach will provide information and allow the management of expectations of stakeholders, and if needed, that provision of alternatives can be sought. For example, a residential home, if the lift is not available, will need to consider siting all reduced mobility residents on the ground floor.

Further advice and guidance on protecting the work force.

SAFed member companies continue to be appraised of the current HSE and Government advice and adopt the guidance in their working practices. However, many of the high priority sectors have increased risk of exposure to Covid-19 due to the nature of the work conducted, for example, any health care settings. Successful completion of inspections in hospitals and the healthcare sector will be paramount to ensure the availability of safe plant and equipment. Further, the only way in which an inspection can be completed is to be present, and therefore, we are continually assessing the locations our employees are attending to ensure as far as reasonably practicable their health is not compromised by Covid-19.

We seek further advice and guidance on any additional recommended PPE, training, and / or access to infection testing, to ensure the health and therefore availability of our workforce, to support statutory inspection requirements, in particular, if attending health care settings.

Please consider a response to these requests as a matter of urgency to support our members, our clients, and the safety of UK plant and equipment in vulnerable and economically sensitive sectors.

Yours Sincerely,

Caroline Hamilton, Chief Executive, Safety Assessment Federation