



## Guidance for Duty Holders to Conduct a Risk Based Approach for Continued Use of Equipment

This guidance has been developed by members on behalf of SAFed using their technical insight and knowledge, in discussion with the HSE, and accepted by UKAS as a pragmatic approach by the Inspection Bodies to provide support to Duty Holders.

The intent of this guidance is to provide a more detailed rationale for Duty Holders on the application of the Risk Based approach and should be read in conjunction with the HSE information on 'Thorough examination and testing of equipment during the coronavirus outbreak' and the associated guidance document 'Thorough examination and testing during the coronavirus outbreak: Your legal obligations', as per the links below.

<https://www.hse.gov.uk/news/work-equipment-coronavirus.htm>

<https://www.hse.gov.uk/news/assets/docs/loler-pssr-during-outbreak.pdf>

This guidance also provides a framework for a Duty Holder to conduct a Risk Based approach for continued use of equipment, and aims to support the Duty Holder in demonstrating a sound understanding of their equipment, its safe continued use, and any additional control measures and their impact.

The guidance is formed around areas as follows:

- Regulatory Requirements and Potential for Postponement
- Equipment Suitability
- Equipment Maintenance
- Equipment Examinations
- Risk Based Approach - Additional Control Measures

It is noted that following this guidance does not automatically provide justification that equipment use can be continued, it simply provides a reasonable framework for review and consideration when adopting a Risk Based approach for safe continued use. The list proposed is not exhaustive, and it is expected that the Duty Holder expands the content of their review based on the type, make and models of their equipment, which may require competent advice which may be available within the organisation, or if not, could be sought externally.

## Regulatory Requirements and Potential for Postponement:

### **Regulations:**

- What Regulations are applicable to the equipment? For example; COSHH, Electricity at Work, LOLER, PUWER, PSSR.
- What further industry guidance has been used?  
Note. Significant amounts of informative guidance is available for employers and Duty Holders through the HSE website.

### **Postponement:**

- For items which have not yet reached their due date, Regulation 9(7) of PSSR presents the opportunity to change examination due dates as long as it is safe to do so. Therefore, for PSSR only - Has the equipment been subject to a postponement?
  - If No, standard PSSR postponement procedures can be applied with the agreement of your competent person.
  - If Yes, the Risk Based approach may be adopted.
  - Note. If a postponement has not been conducted the Risk Based approach may still be used. As per the HSE Guidance, equipment should only be used outside of its test regime if the Duty Holder can demonstrate that it can still be operated safely. If this demonstration cannot be made, and the safe use of equipment cannot be assured, and / or a formal postponement cannot be made, then it should be taken out of use.

## Equipment Suitability:

### **Application:**

- What is the intended purpose of the equipment?

### **Operability:**

- What are the expected capabilities and responsibilities of operators / users?
  - Is additional knowledge, training or supervision required?
  - Are all people using the equipment or supervising / managing its use sufficiently competent to do so safely?
- What plans and procedures are in place to support operation / use?
- Are written procedures, e.g. lifting plans, safe systems of work, operational plans, etc. available?

### **Environment:**

- What are the typical operational parameters with respect to the physical environment, e.g. heat, moisture, as well as working environment, e.g. solitary, busy areas of site?
- Have these parameters changed in any way and could this adversely affect the equipment safety?

### **Safety Features:**

- What safety features (e.g. limits, interlocks) are present on the equipment and are these fully functional?

## Equipment Maintenance:

- Maintenance Schedule & Maintenance of Safety Devices:**
- What formal system of planned maintenance is in place for:
    - regular maintenance?
    - safety critical components that could fail and cause the equipment, guards or other protection devices to fail and lead to immediate or hidden potential risks?
- AND
- are maintenance activities (regular and safety critical) being completed to the schedule?
  - have any observations and / or further activities been noted, and have plans for follow up (repair, checks, etc) been identified and completed?
  - what effect does any incomplete maintenance or follow-up work have on the safety of the equipment? If none, how is this justified?
- Manufacturers' Recommendations:**
- What are the manufacturers instruction or guidance? Have these measures been fully adopted within the maintenance schedule?

## Equipment Examinations:

- Written Scheme:**
- What is defined within the Written Scheme and have examination activities been conducted as per the schedule?
- Examination Reports:**
- Are previous examination reports available? Have these been reviewed? Have any defects, or issues been highlighted?
- Defect Rectification:**
- What, if any, serious defects have been identified? What has been done to rectify these?
- Covid-19 Impact:**
- What, if any, changes in operation / use have occurred as a result of the Covid-19 restrictions, such as stagnation, operating above / below normal operating parameters, and what are the result of the changes, for example, differing / additional damage?

## Risk Based Approach - Additional Control Measures:

- Documentation:**
- What additional control measures have been identified in the documented Risk Assessment? What reviews have been conducted to justify these control measures?
- Communication:**
- What amendments / updates have been made to documented processes / procedures? Who needs to understand and accept this information? How has the information been communicated? What records the demonstrable understanding of the changes?
- Applicable Timeframe:**
- What are the applicable timescales? Are the applicable timescales and any review point(s) clearly identified within the documented Risk Assessment?