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Health and Safety Executive		Operational Circular	
		OC 282/30	
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To
 AFQ Inspectors (Bands 0-4)
 Specialist Group Inspectors (Con, Mech - Bands 0-3)
 HID Inspectors (Bands 0-4)
 Railway Inspectors (Bands 0-4)
 NSD Inspectors (Bands 0-3)

INSPECTION OF FALL ARREST EQUIPMENT MADE FROM WEBBING OR ROPE

This OC replaces OC 282/29. It advises inspectors of the publication of new guidance (leaflet INDG 367) *Inspecting fall arrest equipment made from webbing or rope*; clarifies a publishing error within the leaflet; and provides updated enforcement guidance to inspectors to take account of EMM version 3, when inspecting such equipment.

1 A new leaflet on [Inspection of fall arrest equipment made from webbing or rope \(INDG 367\)](#) has been published following recent research by Health and Safety Laboratory (HSL) involving synthetic fibre webbing lanyards. This research confirmed the range of causes of degradation and highlighted that there is no well-defined boundary (eg usable life) separating those lanyards that are safe and those that are not (eg a one mm cut in the edge of a lanyard can result in a 5-40% loss of strength depending on the make of lanyard being used). It is therefore essential that if lanyards are to provide the required level of protection they are subject to an effective inspection regime.

2 The leaflet is aimed at employers who use fall arrest equipment, incorporating energy absorbing lanyards made from fibre webbing or rope. It gives generic advice on inspection regimes where the equipment is used as part of personal protective equipment for protection against falls from height, and advises employers to consult the manufacturer/supplier of the equipment for any product specific inspection requirements. It confirms that many of the principles can be applied to non-energy-absorbing lanyards and safety harnesses used as protection against falls from height. It does not cover other equipment such as anchor points.

3 The leaflet also advises employers on:

- (1) the types of defects or damage with the potential to result in degradation and/or weakening of the lanyard;

- (2) situations which should result in lanyards being withdrawn from use; and
- (3) British Standards:
 - (a) BS EN 365:1993 *Personal protective equipment against falls from a height. General requirements for instructions for use and for marking*; and
 - (b) BS EN 365:1993 gives general requirements for periodic inspection, instructions for use and marking of PPE against falls from a height.

ACTION BY INSPECTORS

- 4 Over 11 000 copies of the leaflet have been distributed to relevant dutyholders via employer associations, trade associations and other intermediaries. However, inspectors are asked to bring the leaflet to the attention of relevant dutyholders during inspections and where relevant require them to have adequate inspection regimes in place.
- 5 In cases where there is doubt about the frequency of inspections specified in an inspection regime, inspectors should consult specialist group (SG) construction specialist inspectors who can consult Construction Division Technology Unit (CDTU) if necessary.
- 6 Inspectors should be aware that the heading *Legal requirements for inspection* on page 2 of the leaflet was included in error and may be taken to imply that the British Standard referred to in the subsequent text is a legal requirement. If challenged, inspectors should explain the error outlining that the relevant legal requirements are Provision and Use of Work Equipment Regulations 1998, reg.6 and Personal Protective Equipment at Work Regulations 1992, reg.7. The error will be corrected when the leaflet is reprinted.

ENFORCEMENT MANAGEMENT MODEL GUIDANCE

- 7 The following guidance is based on [EMM Operational version 3.0 \(May 2002\)](#) and may be varied by the actual risk on site and other dutyholder factors.
- 8 Where lanyards are in use and there is visual evidence of significant defects or damage (see INDG 367), there is an imminent risk of serious personal injury and a prohibition notice (PN) should be considered.
- 9 With checks and inspections by competent persons, the general benchmark is 'remote likelihood of serious personal injury'. Where lanyards are used frequently and there is no inspection regime, but no evidence of defects, the actual risk is 'a possible risk of serious personal injury'. The Provision and Use of Work Equipment Regulations 1998, reg.6 and Personal Protective Equipment at Work Regulations 1992, reg.7, BS EN 365 and INDG 367 are established standards. The Initial Enforcement Expectation is letter/inspection form. However, applying strategic factors to these circumstances raises the action to be considered to an improvement notice requiring an inspection regime. This is because we know from experience that failure to have an inspection regime in place will, longer term, fail to control the risk.

- 10 CDTU have indicated that they are likely to offer support as set out in paras 11-13 below.
- 11 In the circumstances described in para 9, account should also be taken of lanyards in current use or likely to be used before the inspection regime is in place, and dutyholders should undertake appropriate checks and inspections in the interim.
- 12 CDTU have indicated that they may offer support for PNs, where there is resistance from dutyholders to take interim measures, as follows:
- (1) where any lanyard is less than six months old (three months if used in an arduous environment) to withdraw it from use until a pre-use check has been carried out;
 - (2) where any lanyard is more than six months old (three months if used in an arduous environment) to withdraw it from use until a detailed inspection has been carried out.
- 13 This is because lanyards of uncertain integrity are in use and there could be imminent risk of serious personal injury.
- 14 If support for action as described in para 12 is needed, CDTU should be contacted via SGs to discuss the specific circumstances.

CANCELLATION OF INSTRUCTIONS

- 15 OC 282/29 - **cancel** and **destroy**.

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