



Lift & Escalator Owner News

Subject: COVID-19: HSE guidance on thorough examination and maintenance

Introduction

The Health and Safety Executive (HSE) has revised its guidance on thorough examination at: <https://www.hse.gov.uk/news/work-equipment-coronavirus.htm>. This confirms that there are no derogations from the requirements of the Lifting Operations and Lifting Equipment Regulations (LOLER) and the Provision and Use of Work Equipment Regulations (PUWER) and other regulations requiring thorough examination (TE):

“For equipment covered by these regulations:

- *the requirement that work plant and equipment is maintained and safe to use remains in place*
- *an effective maintenance regime is still essential to make sure equipment is safe*
- *examination and testing is still a legal requirement and a fundamental part of management (although HSE has a pragmatic approach to enforcement during the outbreak)”.*

The following is our guidance to owners/duty-holders of lifts, escalators, moving walks, lifting platforms, home lifts and stairlifts (“equipment”) on the implications of the HSE guidance. Thorough examination of lifting equipment is carried out under LOLER, and maintenance and inspection of work equipment is carried out under PUWER. The owner/duty-holder should continue to ensure these are carried out to ensure the safety of the equipment and users.

The HSE guidance covers specific cases where thorough examination might not be possible due to: a backlog of work from lockdown, staff or contractors not being available to support, or due to refusal of staff from the inspection body to carry out thorough examination. It follows that for all other scenarios, outside the scope of the HSE guidance, there is no change in the requirements for thorough examination.

General guidance to owners and duty-holders

Where the owner/duty-holder’s business is not currently operating, access should be allowed for the inspection body (to carry out thorough examination) and for the maintenance provider so that equipment is ready for when the business reopens. This is supported by LEIA guidance on [What is essential maintenance work?](#)

The owner/duty-holder remains responsible for ensuring safe access to and through their building/premises to the equipment. The owner should ensure that inspection bodies and maintenance providers accessing equipment are provided with a contact person on site who is responsible for them. The owner/duty-holder is responsible for measures in the building to address COVID-19 and to follow Government guidance. The owner/duty-holder should communicate these measures to the inspection body and maintenance provider.

Key issues from HSE guidance for overdue Thorough Examinations and LEIA guidance

HSE guidance addresses situations where thorough examination cannot be undertaken for the reasons identified above. If thorough examination is overdue and cannot be undertaken, the owner/duty-holder may continue to use their equipment only if it is for essential work and only if they can demonstrate that it can be used safely, otherwise they must take their equipment out of service. The owner/duty-holder should follow a risk-based approach described in the HSE guidance to help demonstrate that the equipment can be used safely.

The owner/duty-holder should, as part of their risk-based approach, consider additional measures including additional maintenance after taking advice from the inspection body. HSE guidance does not define a role for maintenance providers who should treat requests for such advice with caution since these might involve them with additional liabilities.

The owner/duty-holder should communicate clearly to the maintenance provider on their measures to address COVID-19, and the further measures the owner/duty-holder is applying if thorough examination is overdue and the equipment has not been removed from service. The owner/duty-holder should make clear to the maintenance provider that any additional maintenance work they request is not thorough examination.

If asked for assistance by the owner/duty-holder, maintenance providers should carefully consider issues such as the following in assessing whether and what additional maintenance and inspection they are able to provide:

- Has the owner/duty-holder consistently shared reports of thorough examination with the maintenance provider and had defects consistently and fully addressed?
- Has the owner/duty-holder had any supplementary tests called for by the inspection body consistently carried out and made available details to the maintenance provider?
- Has the owner/duty-holder had defects and concerns raised by the maintenance provider addressed consistently and fully?
- Are the changes in maintenance being requested by the owner/duty-holder:
 - consistent with the details in the owner's manual (provided by the owner to the maintenance provider)?
 - consistent with the history of the equipment from past maintenance reports?

Conclusion

The owner/duty-holder is responsible for having their equipment maintained and thoroughly examined. Where it is not possible to have thorough examination undertaken due to a backlog of work from lockdown, staff or contractors not being available to support, or due to refusal of staff from the inspection body to carry out thorough examination, HSE guidance requires a risk-based approach from the owner/duty-holder taking advice from the inspection body about additional measures such as additional maintenance. This note includes some issues for maintenance providers to consider if they are requested to provide additional maintenance where equipment is in service and overdue for thorough examination. In cases where HSE guidance is not fully applied then equipment with overdue thorough examinations should be taken out of service.