

Safety Warning Notice No 7

Relevant to those working in the Industrial Door, Domestic Garage Door and Automated Gate industries

At the end of October 2017 a sentence of 42 months' imprisonment was imposed on an employee (installer) of an automated gate company. **dhf** would like to take this opportunity to remind those who work within the industrial door, domestic garage door and automated gate industries of a few pertinent facts relevant to this case in the spirit of learning by experience for all.

The prosecutions were based on an automated sliding gate that was able to derail and overturn when used in a manual capacity by, and subsequently killing the user.

It must also be noted that not only was the employee given a prison term for his shortcomings on site, but his employers were also convicted and fined under Regulation 7 of the Supply of Machinery (Safety) Regulations 2008. These regulations bring the European Machinery Directive into UK criminal law, and regulation 7 makes some very important requirements for automated gates, barriers and doors:

- A compliance assessment (risk assessment) must be conducted that identifies and lists all possible hazards (*structural, moving part, control and electrical*) and which MD Essential Health and Safety Requirements apply
- Foreseeable misuse must be catered for (*people passing through vehicle gates, barriers and doors - despite signs and walkways etc*)
- The identified hazards must be eliminated by safe design (*altering or improving the design*) wherever possible (*structural strength, run back enclosures, guards, constant gap hinges etc*)
- Hazards that cannot be eliminated by safe design must be controlled by applying the "state of the art" (*hold to run, force limitation, safe edges, light grids, photo scanners, electrical safety etc*)
- Hazards remaining when the state of the art has been met must be listed and controlled by warning devices, signs and safe use and maintenance instructions
- A technical file must be compiled that documents in detail the entire design, build, installation and compliance process
- A CE mark must be applied

The technical file must contain at least:

1. A detailed structural design/analysis providing evidence of structural stability, and in particular, foundations, supporting structures, fixing strength, hinges, guides, moving structure and travel stops.
2. A risk assessment including a description, hazards identified, safe design measures, control measures, residual hazards, warning devices, user instructions, detailed maintenance instructions and the Essential Health and Safety Requirements complied with.
3. Test results of compliance tests, force tests, light grid/photo scanner tests and electrical tests.
4. Installation instructions - where others will install the product.
5. Declaration of Incorporation (*from the component manufacturer*) for any drive/control panel used.
6. Declaration of Conformity (*from the component manufacturer*) for any safety device used e.g. safe edge, light grid, photo scanner, safety brake, slack cable device or spring break device.
7. Copies of all component installation manuals.
8. The user instructions (*copy to client*).
9. The planned preventative maintenance instructions, including what needs doing, how often and details of the required skills and experience necessary (*copy to client*).
10. The Declaration of Conformity (*copy to client*).

The system must at least reach the level of safety described in current standards (EN 12604 for structure and EN 12453 for moving parts), notwithstanding the July 2015 warning from the European Commission that some areas of these standards are not currently adequate for legal compliance (EHSR 1.3.7 - moving parts and EHSR 1.4.3. - safety devices).

dhf understands many risk assessments/technical files within the industry are currently not adequate, some only addressing moving parts; this is not acceptable, nor is it safe or legally compliant.

It must be noted, that in addition to the Machinery Directive there are other criminal responsibilities in place under the Health and Safety at Work Act 1974 for employers, employees and the self-employed with regard

to work in progress, work on completion and product manufacture/supply. The Construction Products Regulation EU 305/2011 brings additional requirements for CE marking construction products (doors primarily).

dhf training covers all aspects outlined here and takes account of the declared inadequacies in current standards. Our courses provide the only truly comprehensive guidance available at this time for legal compliance and safety in the vehicle gate, barrier and door industry.

DHFTS 011:2016 provides guidance on all aspects of compliance of installation repair and maintenance of automated gates and barriers. A similar code of practice (**DHFTS 012:2017**) for industrial doors and domestic garage doors is due to follow.



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