Public Consultation

Requirements for Electronic Security – Powered Gates Contractors in the Private Security Industry.

Summary of Public Consultation	
Agency: Private Security Authority	**Legislation:** The Private Security Services Acts 2004 - 2021
Subject: Electronic Security-Powered Gates	**Date:** 11th August 2023
Related publications: None	
Contacts for enquiries: Ian Murray: 062-32659 Josephine Crowe: 062-32616	**Email:** publicconsultation@psa-gov.ie

Agency and Legislation

The Private Security Services Act 2004, as amended, established the Private Security Authority (PSA) as the statutory body with responsibility for the licensing and regulation of the security industry in Ireland. The functions of the PSA as set out in section 8 of the Act include, the specification of qualifications or any other requirements (including requirements as to training) for the grant of licences.

Section 2 of the Private Security Services Act sets out the categories of security service to be licensed by the PSA. The PSA licence both contractors and individuals.

Why is this Public Consultation being issued?

The PSA currently licence contractors who install Powered Gates within the scope of Access Control. As part of the licensing criteria, the PSA wishes to prescribe the requirements which contractors and individuals must meet and adhere to. The PSA is concerned that the level of service currently being provided in this area is not being delivered in a consistent and safe manner across all providers. The security industry and the public expect all those working in the industry to provide an effective security service without posing any undue risk to the public. The PSA believes that the Requirements Document set out in this consultation will contribute to meeting this expectation.

PSA Requirements for Installers of Powered Gates

The PSA has produced a draft document which sets out the requirements which shall apply to contractors who install, maintain, or service powered gates. The document is titled "*Standard For The Licensing Of Powered Gates Contractors (PSA 80:2023)"* and is attached.

Responding to this Public Consultation

This Public Consultation is being issued for the information of contractors, industry stakeholders, interested parties and the public. Comments on same should be made to the PSA by the 15th September 2023.

By email at: publicconsultation@psa-gov.ie or
By post to: The Private Security Authority
Davis Street
Tipperary Town Co
Tipperary E34 PY91

The closing date for receipt of comments is Friday 15th September, 2023.

An tÚdarás Slándála Príobháidí
The Private Security Authority

The Security Regulator

PSA LICENSING REQUIREMENTS

Electronic Security – Powered Gates

(PSA 80:2023)

Standard For The Licensing Of

Powered Gates Contractors

www.psa-gov.ie

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FOREWORD

This Requirements Document has been published by the Private Security Authority for the licensing of contractors in the Powered Gates sector.

The PSA would like to thank the **Door & Hardware Federation (dhf)** for permission to use relevant guidance from their document DHF TS013:2021 which has made a substantial contribution to this document.

1. SCOPE

This standard provides a specification for compliance with licensing by the Private Security Authority and applies to contractors seeking licences to provide security services installation, modification, repair and maintenance of automated gate and traffic barrier systems intended primarily for vehicles, but which could also be accessed by persons.

The Government of Ireland through the Private Security Services Act, 2004 as amended, established the Private Security Authority (PSA) as the national regulatory and licensing body for the private security industry. Amongst the functions of the PSA are:

- The controlling and supervising of persons providing security services and maintaining and improving standards in the provision of those services.
- Specifying standards to be observed in the provision of security services.
- Specifying qualifications or requirements for the granting of licences.

Contractors licensed by the Private Security Authority and those seeking a licence from the PSA must comply with this standard. Only auditing bodies approved by the PSA may provide auditing services for licensing purposes. Contractors should check the PSA website, www.psa-gov.ie, for a list of approved auditing bodies.

By applying for and holding a licence, contractors agree to the sharing of information relating to this document, the contents herein and any audit (including audit reports) undertaken for the purposes of PSA licensing between the PSA and the contractor's auditing body. Where a contractor fails to comply with the requirements of this standard, the auditing body is obliged to notify the PSA.

This document is for the purpose of licensing by the PSA and should not be interpreted as meeting any other statutory obligations of a contractor. It is not a technical reference. Contractors seeking a licence in the Electronic Security – Powered Gates sector must also comply with the PSA Licensing Requirements for Security Service Providers (PSA74:2019).

Only the most recent edition of the Requirements Document specified by the PSA shall apply for licensing purposes. To ascertain the edition applicable visit the PSA website, at www.psa-gov.ie. This requirements document does not cover in detail the design or manufacture of control panels, drive units or safety devices. It does make reference to the minimum compliance requirements for these components where they are incorporated into gate or barrier systems covered by this document.

2. REFERENCES

Normative

The current version of the following standards provides information which is supplementary to the requirements of this document. Where referenced in this requirements document, compliance with the relevant elements of these standards is mandatory for compliance with this document.

IS 10101, ETCI Rules for Electrical Installations.

EN 12978, Industrial, commercial and garage doors and gates – Safety devices for power operated doors and gates – Requirements and test methods.

EN ISO 13849-1, Safety of machinery – Safety related parts of control systems - Part 1 General principles for design.

EN 1991-1-4, Eurocode 1. Actions on structures. General actions. Wind actions.

3. DEFINITIONS

3.1 Activation Device: Button, switch, key switch, handheld radio transmitter, radio transponder, digital keypad, intercom, ground loop, radar movement sensor or any other device used to generate or deliver a command to a gate or barrier system.

3.2 Approved Auditing Body: An auditing body approved by the PSA to provide auditing services in respect of this requirements document.

3.3 Assembler: An organisation who assembles a system from components and hence takes on the responsibilities of a “manufacturer” in regard to legal compliance.

3.4 Automated Gate or Barrier: A powered or automated gate or barrier primarily intended for vehicular use, but which might also be encountered by persons in industrial, commercial, residential or domestic premises.

3.5 Certificate of Compliance: Document issued (as required by this requirements document) to a system manager certifying that the gate or barrier meets the requirements of this standard.

3.6 Client: Individual or organisation retaining and maintaining a security organisation to carry out agreed services covered by this standard, and who is responsible for remunerating the organisation in accordance with an agreed contract or other form of oral or written agreement to provide such services.

3.7 Contract: Document, agreed and signed by both the service provider and the client, setting out the proposed services to be supplied and the details of the quotation, terms, conditions, responsibilities and undertakings.

3.8 Declaration of Conformity: A legally required document from an organisation responsible for legal compliance that the product to which it applies meets all relevant requirements of the Machinery Directive (see section 4) and all other European product safety directives applicable to that product; when first placed on the market or put into service.

3.9 Declaration of Incorporation: A legally required document from the manufacturer of a partly completed machine (PCM) to inform the assembler that the final machinery into which it will be incorporated fulfils the requirements of all applicable European product safety directives and that it must not be put into service until the complete machine is in full conformity with the Machinery Directive.

3.10 Extensive Modification: An alteration to an existing system that is so extensive that a new gate or barrier has been created and hence the need for re-CE marking in accordance with the Machinery Directive. This does not occur where parts are replaced like for like, but does occur where the way it operates has changed significantly.

3.11 Installer: Individual employed by an installation contractor to install, repair, maintain or modify gate or barrier systems.

3.12 Installation Contractor: Organisation responsible for the safe installation of a gate or barrier system.

3.13 Manufacturer: Organisation responsible for the manufacture of a component or complete system.

3.14 Maintenance Contractor: Organisation contracted to provider maintenance, modification or repair of an existing system.

3.15 Normative: Normative Annexes are an essential part of this standard; other Annexes are labelled as informative, giving additional information. Notes in the body of this standard are informative unless declared to be normative.

3.16 Organisation: A Body Corporate, a partnership or sole trader providing services relating to the installing, maintaining, repairing or servicing equipment that consists of power or automated gates or barriers.

3.17 Partly Completed Machine: An assembly which is almost machinery, but which cannot itself perform a specific application, a drive unit and control board is partly completed machinery.

3.18 Planned Preventative Maintenance: Routine servicing of a system, carried out on a regular basis to ensure ongoing safety and reliability.

3.19 Private Security Authority (PSA): The regulatory and licensing authority for the private security industry in the Republic of Ireland.

3.20 Reactive Maintenance: Repair, maintenance or modification carried out in response to the development of a fault.

3.21 Residual Hazard: The hazard that remains when the “state of the art” has been achieved. A hazard cannot be classified as “residual” if there is a state of the art means available to control the hazard. It is not possible to classify a hazard residual simply on the basis of likelihood of occurrence.

3.22 Compliance & Residual Risk Assessment: The process of identifying hazards and controlling them to acceptable levels; primarily, eliminating the hazard by alterations to the design, or applying control measures to hazards that cannot be resolved by design changes to achieve the state of the art. Then, identifying and assessing the residual hazards, providing appropriate controls and warnings, designing safe use instructions and, finally assessing the maintenance needs and designing the planned preventative maintenance instructions such that a gate or barrier system can remain safe.

3.23 Safety Device: A component which serves to fulfil a safety function, which is independently placed on the market, the failure and/or malfunction of which endangers the safety of persons, and which is not necessary in order for the machinery to function, or for which normal components could be substituted in order for the machinery to function (albeit less safely).

3.24 Safe System: A system in conformity with the requirements of this requirements document.

3.25 Site: The premises, property, area or complex at which the service is carried out.

3.26 State of the Art: The state of the art is a concept required by recital 14 of the Machinery Directive. It is the level of safety required and described in current product specific standards and other readily available relevant documents. It is by this means that the state of the art can change due to advances in technology and as standards are updated without the need to edit the directive.

3.27 System Manager: Organisation or person owning, or in control of, or with legal responsibility for, a gate or barrier in service. The system manager has legal responsibilities to users or others who may encounter the system in use.

3.28 System Safety Unknown Notice: A notice issued to a system manager informing them that due to a lack of safe access the safety of the gate or barrier system cannot be ascertained, and hence it is not known if it is safe to use or not.

3.29 Unsafe System Notice: A notice issued to a system manager informing them that the gate or barrier system has been assessed as being unsafe in accordance with this requirements document.

3.30 User: Anybody operating, using or passing by the gate or barrier system who may be affected by it.

4. REQUIREMENTS FOR SAFETY

4.1 Design and suitability of the system

The system must be designed and specified to reflect the demands of the site and the needs of users. Factors that must be considered are:

- Environment (wind, rain, flood risk, dust, ultra violet, flora and fauna)
- Location (sloping ground, emergency entry and egress, visibility and nature of traffic)
- Duty cycle (how often the system will operate per hour/24-hour period)
- User vulnerability (vicinity to the public, young children, people with physical and sensory limitations and people with learning restrictions)

The final specification must be compliant with this requirements document, be drawn up as a design proposal and be agreed with the client.

4.2 Compliance & Residual Risk Assessment

A compliance & residual risk assessment must be conducted for the design of a new system, for the installation of a complete system supplied by a 3rd party, or upon modification of an existing system and prior to taking on any reactive or planned maintenance of a system for the first time. The assessment must include the seven steps described in section 5.

Where the assessment of a new system supplied with a Declaration of Conformity and a CE mark by a third-party indicates that the system *may not* achieve the state of the art, the installation contractor must refer to Annex H.

Where the risk assessment of such a system indicates that the state of the art *is* achieved but residual hazards are present based on its local environment or use, the installation contractor must address them.

4.3 Certificate of Compliance

Contractors must issue a certificate of compliance to clients upon:

- taking on the maintenance of an existing compliant system
- the completion of a safety upgrade to an existing system
- the completion of minor modification of an existing system

Alternatively, where the compliance assessment of an existing system indicates non-compliance with this requirements document, an unsafe system notice must be issued instead. Where access to safety critical elements cannot be achieved safely, a system safety unknown notice must be issued instead.

4.4 Hazard types and Control Measures Required for Compliance

Hazard	Description	Control measures for compliance
Structural failure	Where structural faults cause falling down or derailment	4.5
Electrical	Electric shock, fire, loss of control or safety	4.6
Crush	Reducing gap less than 500mm in horizontal movement, or any vertically reducing gap	4.7, 4.8, 4.9, 4.10, 4.11
Impact	Contact with a moving leaf in the swept area, outside of any crush zone	4.7, 4.9, 4.10, 4.11
Shear	The guillotine effect where elements pass	4.7, 4.8, 4.9, 4.10.2, 4.11
Draw-in	Where body parts may be dragged into a gap	4.7, 4.8, 4.9, 4.10.2, 4.11
Imprisonment	Where escape from an enclosed area is prevented by fault or power cut	Alternative route or 4.7, 4.13
Hooking/cutting	Sharp edges or snagging of clothing	Alternative route or 4.7

Installations must be designed to eliminate hazards wherever reasonably practicable rather than use sensitive devices to control hazards created by the design. All hazards related to moving parts must be controlled or eliminated up to a height of 2.5m above ground level, or any other permanent access level e.g stairway or mezzanine floor. The requirements for safety in this section relate equally to new or existing systems.

4.5 Structural Integrity

It must be demonstrated that a gate or barrier leaf and its supporting structures are designed to resist permanent deformity, ultimate structural failure and derailment in normal use, manual use or under foreseeable misuse. Any deformity that does occur in use must not be detrimental to safety or function.

A gate or barrier leaf, its supporting structure and any suspension elements must be designed such that falling down, collapsing or derailment is prevented in normal use and under foreseeable misuse conditions as follows:

a) Gate or barrier leaves, their supporting structures, suspension elements and fixings must be designed to withstand 2 x the total foreseeable load without permanent deformity.

b) Gate or barrier leaves, their supporting structures, suspension elements, fixings and any travel stops, must be designed to withstand 3.5 x their total foreseeable load without ultimate structural failure.

c) Swing and folding gate systems should be protected against hinge failure whereby if a hinge fails the gate will not drop nor move more than 300mm off its vertical axis. They should also be protected against being lifted more than 50% of their hinge pin length.

In particular, travel stops must prevent derailment (e.g. sliding gate) and suspension element failure (e.g. hinge failure) when used in manual and in windy conditions. Foreseeable misuse must be allowed for, which could mean a user moving the gate to fast in manual. It must be possible to secure the gate against wind action in the fully open and closed position, particularly when used in manual mode.

The effects of wind must be taken into account in the structural assessment. The system must remain safe when subject to foreseeable wind loadings. A system is not necessarily required to remain functional in high winds (although client/contractual requirements might require otherwise); the system must, however, remain safe.
Information on predicting wind pressures on buildings can be found in EN 1991-1-4. This is not an exact science, hence considerable margin for error must be applied where there is doubt.

4.6 Electrical Safety

4.6.1 Supply Wiring

The supply to the installation must be provided, tested and certified to comply with IS 10101 as currently amended. Where an existing supply is utilised, evidence must be gained to demonstrate that it has been tested to ensure safety and compliance with IS 10101 (e.g. client Electrical Installation Certificate or Periodic Inspection Report copy).

4.6.2 System Wiring

The electrical and control system beyond the supply terminals must be built and tested using the same basic principles described in IS 10101 and EN 60204-1. It must be proven by either measurement or calculation that the total earth fault loop impedance of the entire installation is within the specification of the circuit protective device.

4.6.3 Isolation

A means to safely electrically isolate the system for maintenance must be provided. Where an electrical isolator is remote from the system, i.e. cannot be seen from the place of work, it must be prevented from being turned on during maintenance and warning notices posted.

4.6.4 Conductive Parts Earthing

Where class 1 earthed equipment (230/400v earthed) is present, all extraneous conductive parts must be connected to the supply earth terminal or prove to have a resistance of less than 0.5 ohm to the earth terminal. *Please note that many 24v electric operators are in fact 230v class 1 devices.*

4.6.5 Differing Voltage Bands

Where cables containing differing voltages share a conduit, all cables must have a voltage rating of the highest voltage present or the higher voltage cable must be surrounded by an earthed metallic screen, for example, steel wired armoured (SWA) cable or similar.

4.6.6 Communication or Data Cables

Where communication or data cables share a conduit with power cables, clause 4.6.5 above must apply with the addition that the data cable must also be screened and earthed.

4.6.7 Cable Ratings

Cables must be rated for the voltage present and the maximum current possible; volts drop must be no more than 5% or within the control system supplier's specification.

4.6.8 Flexible Cables

Cables used to connect equipment that moves relative to fixed elements in normal use (eg rams) must be of multi- stranded conductors to IEC 60228 class 5 or 6 (multiple fine strand copper conductor, not SWA, etc.).

4.6.9 Electrical Enclosures

- Enclosures subject to external conditions must be at least IP54
- Enclosures and drive units used below ground must be at least IP67
- Enclosures containing dangerous voltages must be marked with an appropriate dangerous voltage label and be openable only by means of key or tool

4.6.10 Mechanical Protection of cables

All vulnerable cabling must be provided with mechanical protection by means of conduits, trunking or armouring. Vulnerable cabling is anything containing 230v or greater or anything that forms part of a control system; examples include photo beam cables, safe edge cables, light grid/laser scanner etc. cables, motor cables, encoder cables or access control device cables. All cables, trunking, conduits and enclosures must have adequate UV protection where they are subject to sunlight.

4.6.11 Control System Integrity

Where a third party has provided the control system, the control panel/motor manufacturer's Declaration of Incorporation must be present, and the relevant instruction manual followed. Alternatively, if the manufacturer or assembler has built their own control system they must type test the system for conformity with Machinery Directive EH&SR 1.2 (Safety and Reliability of Control Systems), all other relevant EH&SRs, and all applicable product safety directives (see section 7). This will include the Electromagnetic Compatibility Directive (electrical devices) and the Radio Equipment Directive (radio devices) where applicable. Test reports must be available to prove compliance when required.
Activation of a safety device at one hazard location must not lead to any further hazards at other locations on the system. In the event of a fault in the safety system it must prevent further movement by at least the end of the current open/close cycle.

4.6.12 Safety Device Circuits

The system connecting safe edge, light grid or laser scanner etc. devices must be fully compatible with the control system they are connected to such that, as installed, they conform to category 2 or 3 of EN 954-1 or EN ISO 13849-1.

The circuit must be either protected from short circuit faults by a control panel derived category 2 test of the circuit at least once in every cycle, or for some category 3 devices not protected from short circuit faults, by means of:

- minimum 1mm^2 csa conductors, and
- use of short as possible cable routing, and
- use of crimped, ferruled or tinned conductor ends to prevent stray strands, and
- wherever reasonably practicable, the device must be placed within the control panel, or failing that be connected via armoured cable or cable in conduit

4.6.12.1. Post 2018 System

Systems produced after 2018 (since the publication of EN 12453:2017) are required to have all safety related parts of the control system in conformity with EN 13849-1 at minimum performance level C through the entire control system from any switch or sensing element to the motor terminals or be in full conformity with EN 60335-1 and 2; this must include any wicket gate stop switch. The following devices will additionally need to achieve at least category 2 as installed and prevent further movement by at least the end of the current open/close cycle in the event of a fault:

- non-contact presence detection device
- pressure sensitive device (safe edge)
- limit switch

4.6.13 Wicket Gate

Where a wicket gate is fitted in an automated gate, movement of the main gate must be stopped whenever the wicket gate is not in a safe position; devices and wiring used to achieve this must only fail to a safe condition.

4.7 Safety distances

Guards or fencing can be used to prevent access to hazardous movement and must:

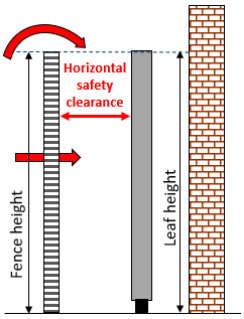
- be permanently fixed and only removable with a tool or key, and
- be durable and resistant to foreseeable abuse, and
- be designed to resist climbing with vertical elements on the outside and a maximum gap of 40mm between verticals and, conform with tables 1 and 2 for reach over and reach through protection

Height of guard	Height of leaf		
	2	2.2	2.4
	Horizontal clearance		
2	350	350	100
2.2	0	250	100
2.4	0	0	100
2.5	0	0	0

Table 1 – data from EN 13857

Rectangular aperture smallest dimension	Horizontal clearance
18.5 or less	120
18.6 to 29	300
29.1 to 44	500
44.1 to 100	850

Table 2 –from Annex B of EN12453

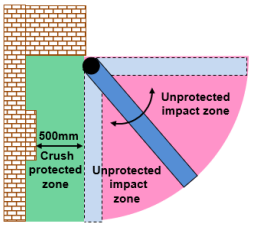


Various safety distances exist (derived from EN 349 & EN 12453) to prevent injury to differing body parts:

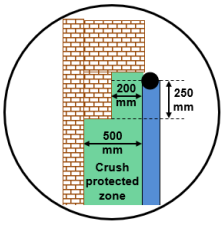
Crush hazard		Draw-in/shear hazard
Finger = 25mm Hand wrist = 100mm Arm, foot = 120mm	Leg = 180mm Head = 300mm Body = 500mm	Finger = 8mm (4mm at a hinge)

These can only be applied or utilised at points where only that size of body part could reasonably be affected. Hence use of these distances, other than 500mm, is severely restricted in most cases. For example, there is no point restricting a reducing gap to 25mm where an arm or leg could easily be inserted; the arm or leg would be seriously injured when the gap reduces to 25mm.

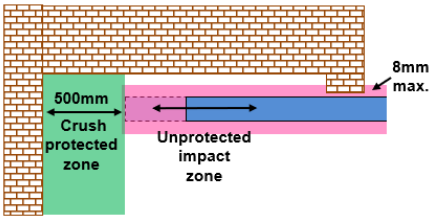
A gap greater than 500mm between a horizontally moving leaf and a fixed object eliminates the crush hazard potential at that location.



Swing door/gate



Relaxation to 200mm within 250mm of the hinge

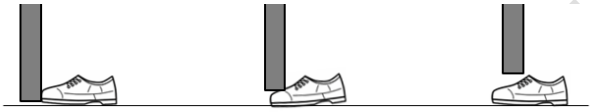


Sliding door/gate

However, an impact hazard will remain across the swept area of the leaf during movement that must be controlled by one or more of the means described in 5.5 to 5.7.

A foot crush hazard can be prevented by ensuring the gap under the leaf in the swept area is:

1) less than 8mm or more than 120mm, and
2) constant, without of slopes and kerbs, etc.



Less than 8mm and level = impact

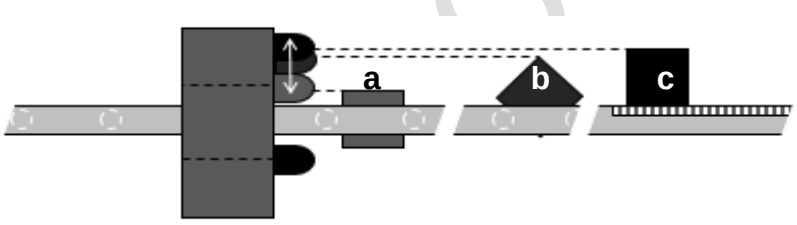
More than 8 and less than 120 or not level = crush & impact

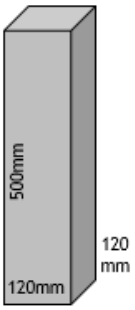
More than 120 and level = impact

Hazards in the swept area should be controlled by one or more of the permitted control measures: hold-to-run, force limitation or non-contact presence detection. Where force limitation is used, the nature of the hazards in the swept area will dictate the maximum force that can be used:

3) crush & impact hazards in the swept area = 400N maximum
4) impact only in the swept area (no crush) = 1400N maximum

A safe edge used to protect a sliding gate draw-in hazard must be positioned as close as possible to the moving leaf to prevent draw-in occurring.

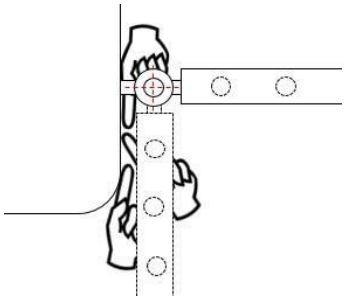




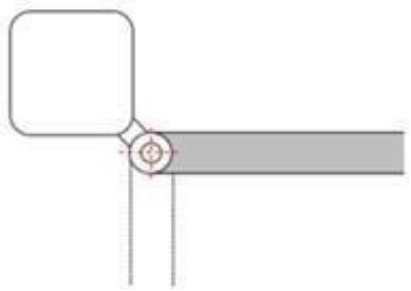
a) = Infill gaps >120mm b) = infill gaps <120mm c) = fine mesh or solid

The minimum distance allowable between the moving leaf and safe edge must be verified with a rigid rectangular test piece measuring 120mm x 120mm x 500mm. The test piece must be placed as deep as possible into the leaf infill material; the safe edge must be in close enough proximity to be activated by the test piece when the leaf is moved in manual. The nature of the gaps in the leaf infill dictate safe positioning of the safe edges.

Reducing gaps at the hinge area can generate very high force. Access to a reducing gap at a hinge area is possible from a variety of directions (see below). Reducing gaps at the hinge area must be avoided by safe design wherever possible. A safe design hinge area must have a gap of less than 100mm, less than 4mm or greater than 25mm, and any gap-change must be less than 20%.



Access to reducing gaps



Safe design hinge area

Safe design hinge area criteria:

- a constant gap of less than 4mm or more than 25mm, or
- where the overall gap is less than 100mm, a changing gap of 20% or less.

When the safe design hinge area criteria is not met, one or a combination of the following measures must be applied such that the hazard is controlled:

- Hold to run
- Safe edge
- Flexible guard
- Fine mesh to prevent access through the infill
- Non-contact presence detection

4.8 Hold to Run

Sustained pressure on the activation device must be required to move the leaf and:

1. the leaf must travel no more than 100mm on release of the activation device, and
2. for sliding gates, the leaf must travel no more than 50mm on release of the activation device in the last 500mm of horizontal movement, and
3. only trained users must use the system; hence the activation device must prevent unauthorised use where untrained persons might be present (by use of key switch or similar), and
4. the device should be designed or placed such that it can only be used in a position that allows full, direct, and permanent real-time view of the leaf during the leaf movement and ensures that the person controlling the gate or barrier is not in a hazardous position, and
5. only one device should be active at any one time, and
6. the leaf must travel at no more than 0.5m/sec (for converging leaves this means 0.25m/sec. each)

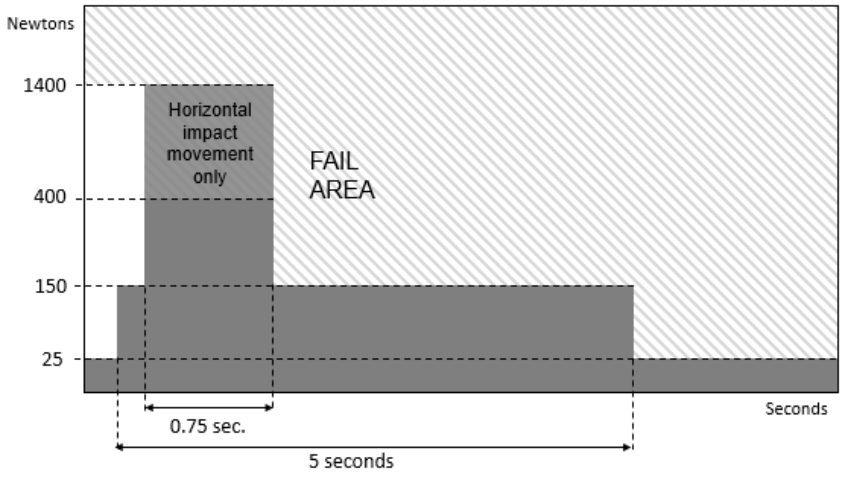
Note: According to EN 12453, video cameras do not give a full, direct, and permanent real-time view

Hold to run can be used to control **crush, impact, shear or draw-in** hazards.

4.9 Force Limitation (safe contact solutions)

The maximum allowable forces and durations are:

- 400N at crush, shear and draw-in hazards (all vertically reducing gaps and horizontally reducing gaps of 500mm or less)
- 1400N at horizontal impact hazards (contact with a horizontally moving leaf outside of a crush, shear or draw-in zone)
- The maximum time force can remain above 150N in all cases is 0.75 seconds
- The maximum time force can remain above 25N in all cases is 5 seconds
- The maximum time a force can exist at or below 25N in all cases is infinite



Force limitation maximum values

4.9.1 Safe Edge

Force limitation can be provided by safe edge in resistive, optical, mechanical, or pneumatic format and:

- The device should be UKCA/CE marked and come with a manufacturer's machinery Declaration of Conformity
- the safe edge and any control device should conform to EN 12978
- the safe edge should provide the permitted force and time figures
- the safe edge should protect the full height/width of the crush/impact zone with the exception that the edge does not need to be sensitive in the final 30mm of each end
- the control circuit should meet the requirements of 4.6.12

The required safe edge specification is governed by leaf overtravel (stopping distance). The speed & weight of the moving leaf, the reversal torque of the operator and the time the control system takes to react all affect overtravel. The available overtravel in the safe edge will need to be greater than the overtravel of the leaf in all but the lightest of systems.

A safe edge can be used to control any **crush, impact, shear or draw-in** hazard.

4.9.2 Inherent Force Limitation

Force limitation at some hazards can be provided by sensitive drive units.
The system should reliably provide the permitted force and time figures.

Inherent force limitation can be used to control some, but not all hazards:

- Inherent force limitation should not be used to control draw-in hazards, by implication, this will also apply to any associated shear hazards.
- Inherent force limitation is unlikely to be able to provide safe force at reducing gaps in the vicinity of the hinge on hinged systems, particularly in reducing hinge gaps, or at the lower edges in the hinge area.

  These areas will normally need safe edges to provide force limitation. If inherent force limitation is to be relied upon to provide force limitation in these areas, the resulting crush force should be measured directly in that location.
- Inherent force limitation systems are unlikely to provide safe force on hinged systems when subject to high winds. It will usually be necessary to rely on safe edges for force limitation on such systems, given that the system should be safe in all conditions. If inherent force limitation is to be relied upon for such a wind affected system, evidence should be provided that safe force is achieved, even in high winds.

4.9.3 Force Measurements

Testing must be carried out with an annually calibrated instrument that complies with EN 12445 or EN 12453.

4.9.4 Force Measurement of New Pre-CE Marked Systems

Installation companies commissioning new pre-CE marked systems must conduct testing in accordance with the installation and commissioning instructions supplied with the gate or barrier, or use the methods in 4.10.7 to 4.10.9.

4.9.5 Force Measurement of all Other Systems

Tests should be conducted with an annually calibrated instrument that complies with EN 12453 or EN 12445. Manufacturers type testing for serial production will involve many multiples of tests, in accordance with the relevant standard but, when doing one-off testing of individual systems as part of commissioning or maintenance, a reduced number of tests is more appropriate. In general, each test position should be tested once but, where the result is in excess of 90% of the maximum permitted value, it should be repeated three times and the average of all three tests taken as the actual result.

The 90% threshold values above which an average of three tests must be used are:

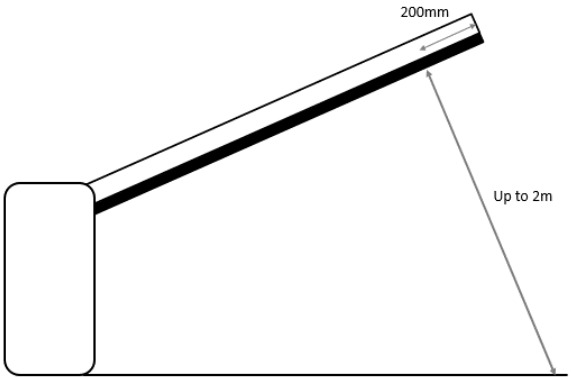
- 360N (400N maximum) for crush hazards
- 1260N (1400N maximum) for horizontal pure impact hazards
- 0.68 seconds (0.75 second maximum) for force to remain above 150N
- 4.5 seconds (5 second maximum) for force to remain above 25N

4.9.6 Force Measurement Point on Traffic Barriers

The measurement must be taken with a 2m maximum extension fitted to the tester:

- 200mm in from the tip of the arm, and
- at an angle that results in the face of the tester being parallel with the arm

Lightweight gravity deployed skirts (not fixed or linkaged) may be tied up out of the way for the test. This will mean that any system utilising a safe edge will need the skirt to collapse such that it reveals the safe edge.



The test must result in a 400N maximum and achieve force reduction in line with 4.10.

Note1(normative): Fixed or linkage connected skirts must be assessed in terms of reachable hazards in reducing gaps in the skirt during the opening and closing phases and appropriate control measures applied in line with 5.6.

4.9.7 Force Measurement Points on Horizontally Moving Gates

Test 1. An initial measurement must be taken at the mid height (or for gates taller than 2800mm high at 1500mm above ground) with an extension on the tester that results in testing at full speed movement

Test 2. Then at three heights with a 500mm extension on the test meter:

2.1. 300mm from the top of the gate (or for gates taller than 2800mm high at 2500mm above ground)

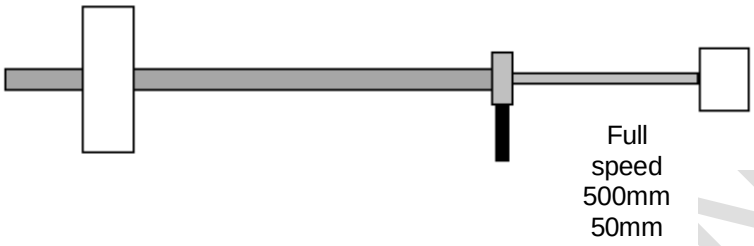
2.2. At the mid height or 1.5m, whichever is the lower

2.3. 50mm up from the base of the gate

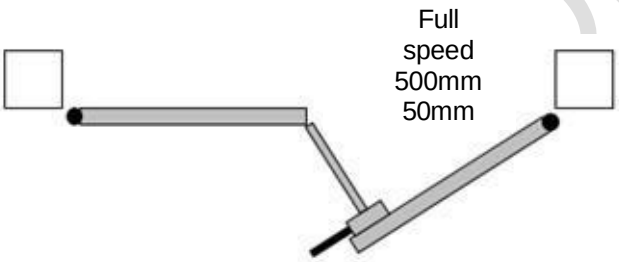
Test 3. The point of highest reading at points in tests 2.1. 2.2. & 2.3 is then re measured with no extension on the test meter (50mm)

The gate must be tested in the mode in which it is to be used. If a leaf delay is used, it must be tested with that same delay; if no delay is used, the leaves must be tested as they converge.

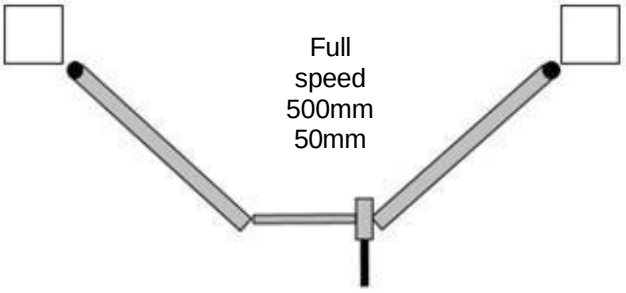
Sliding gate test position -



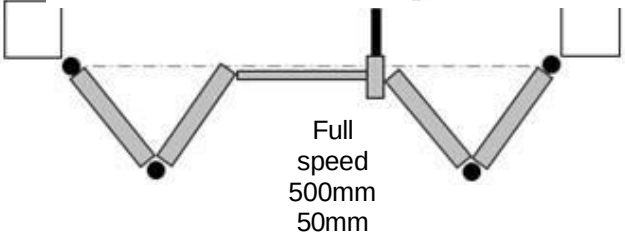
Swing gate test position (with leaf delay) -



Swing gate test position (without leaf delay) -



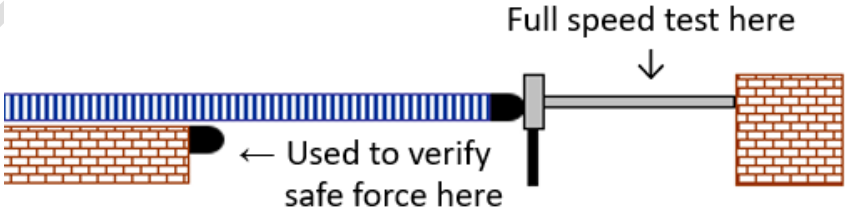
Folding gate test position -



Single leaf systems must be tested at the closing post instead of being tested against the other leaf.

4.10.9. Result assessment for hazards not tested directly – sliding

As testing at draw-in points on sliding gates is not usually possible or safe, the full speed main edge result can also be used to assess safe force at other hazards in the swept area.



This method assumes that opening and closing speeds and settings are equal.

Comparing the full speed result, with the protection used on the main edge, and the protection used at other swept area crush, shear and draw-in hazards, reveals what action is necessary as explained in the following table.

Trailing edge open impact hazards can be assessed directly from the main edge test results, other crush, shear and draw-in hazards can be assessed as follows.

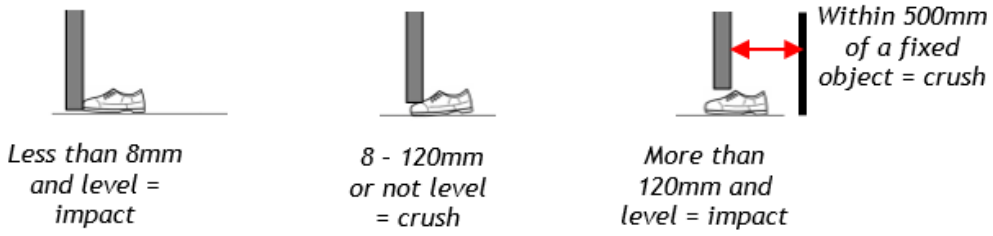
Full speed result at the main edge	Main edge protection	Swept area hazard protection	Result assessment outcome and required action at swept area hazards.
Up to 400N	Safe edge	Same	OK - no further testing/action required
Up to 1400N	Safe edge	Larger	*Not verified - test sample of the larger safe edge on the main edge*
Up to 400N	Safe edge	Smaller	*Not OK - fit equal size safe edge*
Up to 1400N	Safe edge	Same/smaller	*Not OK - fit larger safe edge*
Up to 1400N	Inherent	Safe edge	*Not verified - test sample safe edge at the main edge*
Up to 1400N	Inherent	Inherent	*Not OK - inherent force limitation not suitable for draw-in*

4.10.10. Result assessment for hazards not tested directly – swing and folding

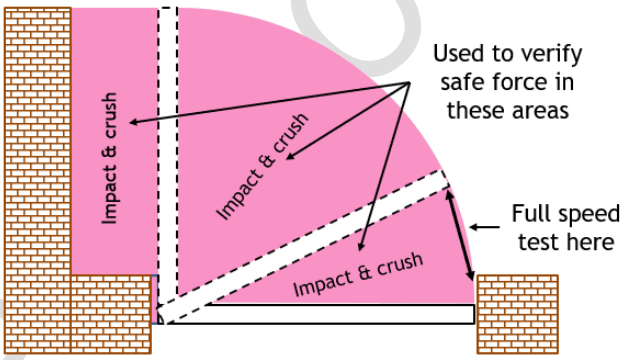
The full speed main edge result can also be used to assess safe force in the swept area of swing/folding doors & gates as follows:

1) Where the swept area does contain crush hazards, the full speed main edge test should result in 400N or less, or

2) Where the swept area does not contain crush hazards, the full speed test at the main edge could result in as much as 1400N.



Comparing the full speed result with the protection used at the main edge, and the protection used at the hazard being assessed, can reveal what action is necessary. This is explained in the following table.



Full speed result at the main edge	Main edge protection	Swept hazard area protection	Swept area hazard	Result assessment outcome and required action at the swept area hazard
400N or less	Safe edge	Safe edge	Crush	OK – no further testing/action required
401N to 1400N	Safe edge	Safe edge	Impact only	OK – no further testing/action required
400N or less	Safe edge	Inherent or smaller safe edge	Crush	Not verified – safe edge/larger safe edge needed in the area close to the hinge, or measure force at the hazard
401N to 1400N	Safe edge	Inherent or smaller safe edge	Impact only	Not verified – test inherent at the main edge (away from the safe edge)
400N or less	Inherent	Inherent	Crush	Not verified – safe edge needed in the area close to the hinge, or measure force at the hazard
401N to 1400N	Inherent	Inherent	Impact only	OK – no further testing required

4.10.11. Supplementary Device

Force limitation is not considered to be universally safe. Where users are untrained, the means of activation is remote from the system, or there is reasonable possibility that untrained people will be affected, supplementary devices for the detection of people (e.g. photo beams) must be added. This is to reduce the probability of contact with force limited movement.

The supplementary device should be active somewhere between 700mm and the ground, and no more than 200mm horizontally from the face of the leaf and active across the entire width.

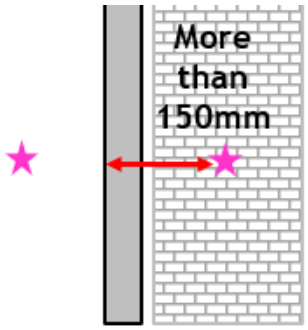
For hinged doors and gates, where an inner device is used, it should be active no more than 200mm horizontally from the open extremity of the swept area.

For traffic barriers, either one device active directly below the arm, or two devices, one on either side within 200mm of the arm are permitted.

Table 1 of EN 12453 provides the minimum level of protection necessary at the main edge when using force limitation.

Activation	Users present		
	Only trained users present	Trained users, untrained people present	Untrained users
Impulse activation in sight	No supplementary device needed	No supplementary device needed	Supplementary device required
Impulse activation out of sight	No supplementary device needed	Supplementary device required	Supplementary device required
Automatic	Supplementary device required	Supplementary device required	Supplementary device required

Systems manufactured after 2018 (since publication of EN 12453:2017), with a distance greater than 150mm between the device and the opposite face of sliding and vertically moving leaves, are required to have a device active on both sides.



4.11. Non-contact Presence Detection

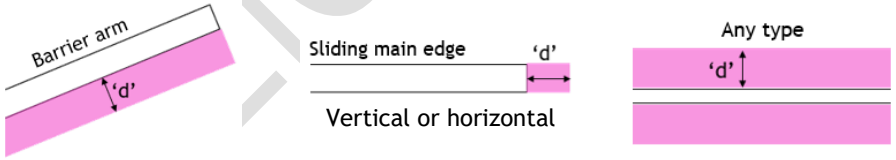
Non-contact presence detection systems are those that that can prevent a person from being touched by the moving leaf. When a system is fully protected by non-contact presence detection, there is no need for force limitation, but the system must be tested for effectiveness, and the following:

1. The device should be UKCA/CE marked and come with a manufacturer's machinery Declaration of Conformity
2. The device should be compliant with EN 12978
3. Any background field auto adjust time should be at least 30 seconds
4. As installed, the system should meet the requirements of section 4.6.12

Single beam photoelectric beams are not included, unless they can exclude all possible contact with the hazard, for example, when attached to the lower edge of a vertically moving door or barrier.

There are two permitted methods of providing protection:

1. Acting directly in the movement plane of the door/gate:
   - acting within or through drillings in the guides (e.g. shutters), or
   - a device mounted on and traveling with the main edge (see 'd' below)
2. Acting to create safety zones on both sides of the door/gate, extending a distance 'd' horizontally from the face of the door/gate/barrier:
   - related to the speed and height of the door, but no less than 200mm, and
   - dimensioned to activate before a person can be contacted



Compliance and effectiveness of the system is not verified by configuration or mounting position, but by testing.

Non-contact presence detection technology can be used to control any crush, impact, shear, draw-in or lifting hazard. There are no limits on the presence of untrained persons or means of activation with this type of protection.

NOTE: Be aware that these systems can be subject to nuisance tripping due to adverse environment and weather conditions (heavy rain, snow, wind-blown debris or animals and birds). Where systems can be desensitised to accommodate these effects, they should still pass the tests set out below and will require re-testing following any adjustments.

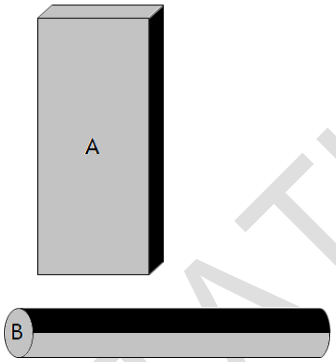
This technology can be used to control **crush, impact, shear or draw-in** hazards.

4.11.1. Testing Non-contact Presence Detection.

Installation companies commissioning new pre-CE marked systems must conduct testing in accordance with the installation and commissioning instructions supplied with the gate or barrier, or use the methods in 4.11.2 to 4.11.5

On site testing as part of commissioning or maintenance, is conducted with rigid material test pieces as follows.

Test piece A.
Rigid material 700mm x 300mm x 200mm.
Painted matt black on three sides RAL 7040 grey on the other three.
Used for impact and whole-body simulation.



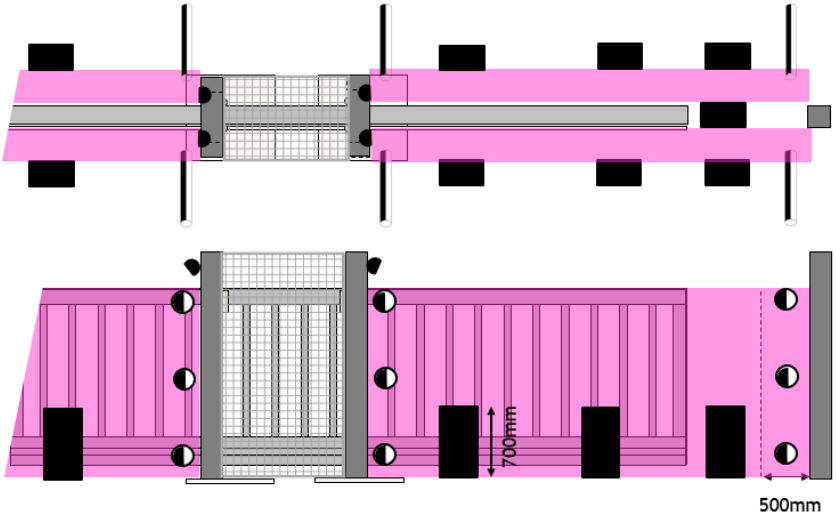
Test piece B.
Rigid material 300mm x 50mm painted, half matt black and half RAL 7040 grey.
Used for arm, hand and foot simulation.

The reaction of the system to an activation of the device will be crucial. In some locations, the resulting reversal can result in un-protected movement at other hazards. For this reason, pause, stop, or even emergency stop may be the required reaction to activation on some systems. No contact with hazardous movement is permitted in a successful test.

NOTE: Machine safety legislation dictates that activation of a safety system at one hazard location should not create further hazards on other parts of the machine.

4.11.2. Testing Non-contact Presence Detection on a Sliding Gate

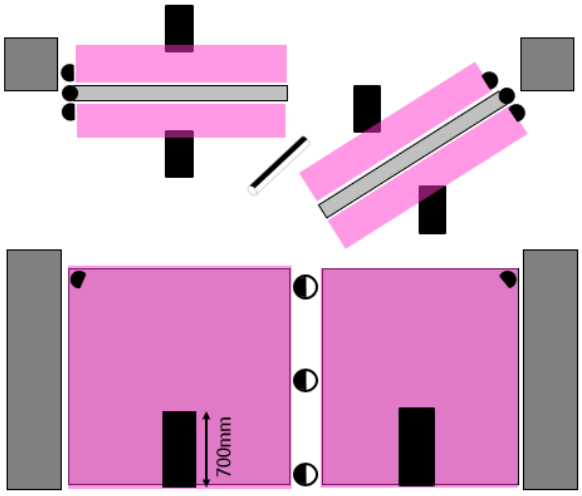
Test pieces A & B should be presented towards the moving leaf at all hazard areas from both sides. Test piece A should be used at impact hazards and test piece B should be used at crush, shear and draw-in hazards.
Movement should cease before the test pieces are impacted, crushed, sheared or drawn-in.
Test piece A is also placed in the dead zone with its 200mm dimension horizontal to the leaf; no movement should be possible.



Test piece A is oriented with the 700mm dimension vertical

4.11.3. Testing Non-contact Presence Detection on Swing Gates

Test pieces A & B should be presented towards the moving leaf at all hazard areas from both sides. Test piece A should be used at impact hazards and test piece B should be used at crush hazards.

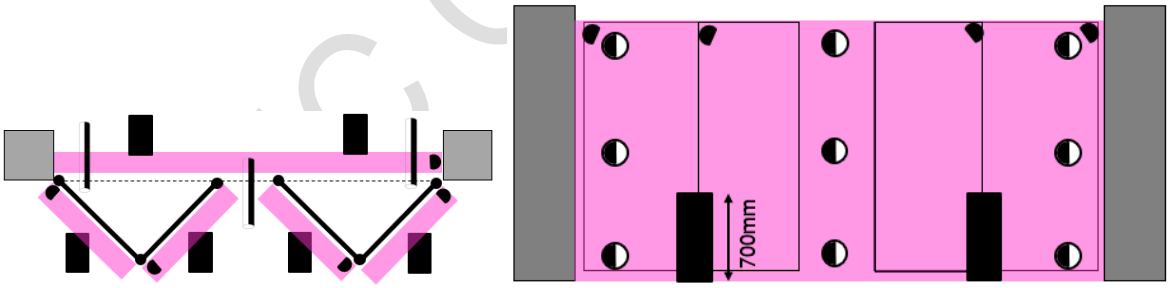


Test piece A is oriented with the 700mm dimension vertical

Hazardous movement should cease, or the leaf should reverse, before the test piece is impacted or crushed. If the leaf reverses, the leaf should remain protected during the reversal movement.

4.11.4. Testing Non-contact Presence Detection on Folding Gates

Test pieces A & B should be presented towards the moving leaf at all hazard areas from both sides. Test piece A should be used at impact hazards and test piece B should be used at crush hazards.



In this example, 4 x laser scanners are protecting the inner surfaces and a single light grid is protecting the outer face. The threshold device will need to activate ‘emergency stop’ in order to prevent crush 7 impact within the “V” between the leaves.

If the leaf retracts, the leaf should remain protected during the reversal movement.

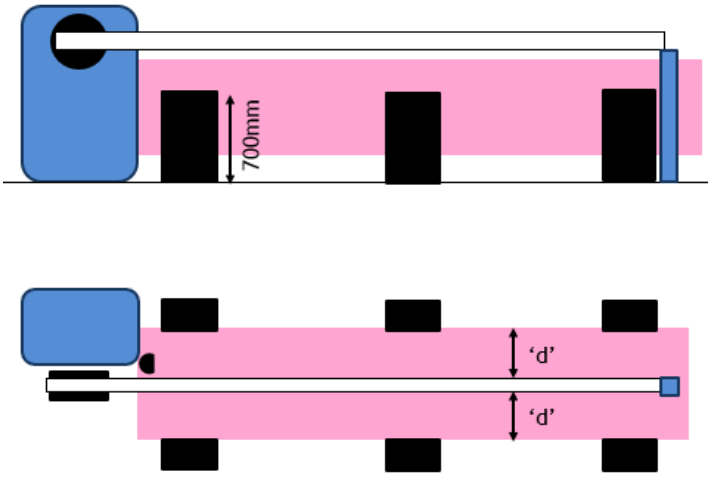
4.11.5. Testing Non-contact Presence Detection on Barriers.

Test pieces A & B should be presented towards the moving leaf at all hazard areas from both sides. Test piece A should be used at impact hazards and test piece B should be used at crush hazards.

Example 1 - Single laser scanner is providing an exclusion zone ‘d’ either side of the arm.

Test piece A should be offered to all points at the periphery of the protection zone from both sides with the 700mm dimension vertical.

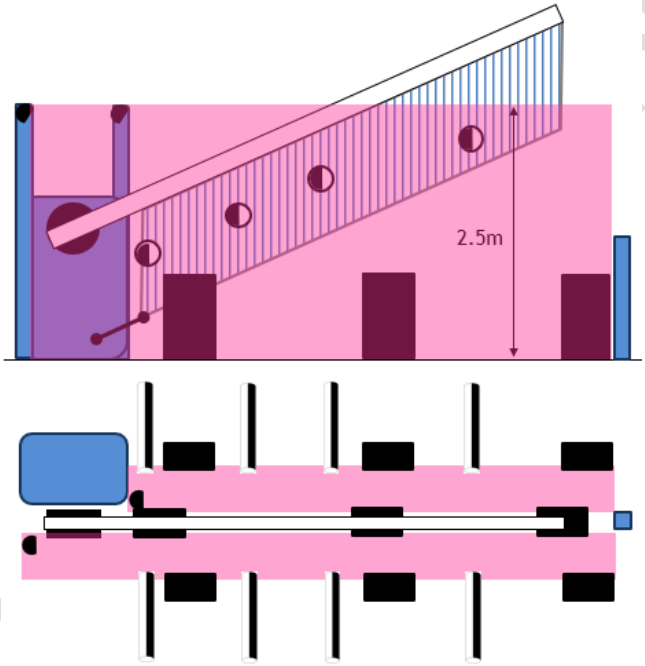
Contact with hazardous movement should be prevented.



Example 2 - Two laser scanners or light grids are used to provide a 2.5m high exclusion zone either side of a barrier fitted with a linkage operated (fixed) skirt that has crush hazards in the skirt as the arm raises.

Test piece A should be offered to all points at the periphery of the protection zone from both sides during closing (700mm dimension vertical). Test piece B should be offered to reducing gaps associated with the skirt during opening.

Contact with hazardous movement should be prevented.



4.12. Imprisonment Hazard Control

An imprisonment hazard is caused when the gate is the only route out of an enclosed area where people can come to harm. In such environments, a manual release should be provided at the gate. Where untrained users will be affected, user instructions should also be displayed.

The gate should remain safe when being used in manual mode and also when power is restored unexpectedly.

NOTE: Depending on the location and use, fire safety regulations may require additional escape means that are less restrictive to use – e.g. push bar swing doors. Very few automated gates could achieve the ease of use required for an emergency escape route in a multi occupancy building.
Care must be taken to ensure that the system will not contravene fire safety legislation. Organisations should consult Technical Guidance B document for more accurate escape routes.

4.13. Manual Use (automated system in manual mode)

Use of the manual opening and closing systems must not introduce hazards. Moving the leaf in manual must be achievable with ease and, where more than one person is required to move the leaf in manual mode, the customer must be made aware of this and the user instructions must also explain this.
A safe force for one person to move a leaf in manual is 390N in industrial environments.

4.14. Powered Pedestrian Gates

The scope of EN 12453 does not cover horizontally moving pedestrian-only entrance systems, these are covered by the automatic door standard EN 16005. Whilst it is not an absolute legal requirement to use the appropriate harmonised standard, an equal or improved degree of safety must be achieved.

In higher risk environments, where there will be high numbers of children or vulnerable adults using the door, EN 16005 requires the use of non-contact presence detection over force limitation. Non-contact presence detection according to EN 12453, as explained in clause 4.11, provides an equal degree of protection.

Where the environment or the gate design does not lend itself to EN 16005 automatic door operators and associated optical safety devices, safety could alternatively be provided using a combination of force limitation and supplementary beams according to EN 12453, as explained in clause 4.10.

DHF advises that, if force limitation in combination with supplementary beams is to be employed, the maximum force should be kept much lower than the 400N permitted by EN 12453 (e.g. 150N to match EN 16005) and that the supplementary devices should be employed on both sides of the swept area. This should be applied together with a combination of additional residual hazard controls – see clause 4.15 below.

4.15. Residual Risk Assessment

A residual risk is the risk that remains after the state-of-the-art has been achieved, for example, the effects of being subject to 399N for 0.74 seconds. For very young or infirm people, the effect of residual risk could in fact be significant and, hence, the residual risk assessment should attempt to reduce the degree of harm possible. Where high risk exists (e.g. at a school), non-contact solutions, even lower force than the standard allows or additional beams should be given the highest priority.
Vehicle related hazards should be considered and provided for at this stage as the state-of-the-art is primarily concerned with the safety of people, not vehicles.

Residual risks can be controlled by applying suitable measures, e.g. one or a combination of the following, shown in order of merit for the protection of vulnerable users:

1) non-contact
2) very low force
3) additional photo beams
4) warning lamps
5) LED warning strips
6) audible warning devices
7) activation devices
8) pedestrian railings
9) signage
10) zone lighting
11) hazard tape
12) ground markings
13) traffic lights
14) vehicle detectors
15) traffic calming
16) user warnings
17) user instructions
18) user training

Selection of appropriate residual controls should be arrived at based on a local risk assessment. Unlike the main body of hazards dealt with by the state-of-the-art, where the focus is on the potential degree of harm, the control of residual risks can be based on likelihood of occurrence and frequency of exposure.

The need for residual hazard controls reduces as the likelihood of contact with a residual hazard diminishes on a given site. Great care is required none the less as, in the event of an incident, the findings of the residual risk assessment will be brought into judgement to some degree at least. Written user warnings, safe use instructions and user training should be provided and are an important aspect of residual hazard control.

5. COMPLIANCE & RESIDUAL RISK ASSESSMENT PROCESS

The assessment process in this section applies equally to new or extensively modified systems, reactive maintenance, planned preventative maintenance and minor modifications. Reference is made to the Machinery Directive Essential Health and Safety Requirements in this section, but the Machinery Directive Essential Health & Safety Requirements are technically only relevant, and hence need to be recorded, for new and extensively modified systems (see section 4).

The actual requirements for safety are however the same for all automated gate and barrier work and are described in section 1 which reflects and clarifies the requirements of the various applicable standards and represents the state of the art.

This risk assessment process must be conducted for the design of a new system, installation of a complete system supplied by a 3rd party, upon modification of an existing system and prior to taking on any reactive or planned maintenance of a system for the first time.

The risk assessment process must be documented and split into seven distinct steps with each step properly documented, described below in 5.1 to 5.7. and recorded as per 5.8.

5.1 Describe the System

Describe the system, the nature of users, the environment, the activation methods and the expected duty cycle, etc.

5.2 Identify and make a numbered list of all possible hazards associated with the system, including those arising from foreseeable misuse

Make a list of all hazards associated with the system: structural, electrical, control or safety system, moving parts, wear and tear, etc. This part is simply a list of all the things that could present a hazard in normal use and under foreseeable misuse. This section should not be confused with describing specific 'faults' with a given system; it is a list of potential hazards that must be controlled.

5.3 Resolve as many hazards as possible by application of, or checking the existing, safe design principles

Provide (or propose for existing systems) measures to resolve or reduce as many of the hazards listed in step 2 as possible by improving the design to eliminate or reduce the hazard. These will include structural integrity, safe distances and clearances, guards & enclosures, electrical safety, and control/safety system integrity.

5.4 Apply, or check the existing, state of the art control measures for the remaining hazards

Provide (or propose for existing systems) permitted measures to control all remaining hazards: hold-to-run, inherent force limitation, safe edge force limitation, non-contact presence detection. In all cases, the state-of-the-art standards represent the absolute minimum acceptable level of safety needed for legal compliance.

5.5 Identify the remaining minor residual hazards

Identify and list the residual hazards (hazards that remain when the state-of-the-art is achieved). Consider the risk to vulnerable users, e.g. high numbers of children, persons with mobility, sight, hearing, learning limitations. Protection of vehicles should also be considered at this stage; the state-of-the-art is mainly focused on the safety of people.

5.6 Design user instructions and warnings

Provide (or propose for existing systems) residual hazard control measures based on the likelihood of occurrence, frequency of occurrence and user vulnerability. If necessary, consider reducing some hazards further, e.g. by proposing even lower force, additional photo beams, non-contact technology or re-design. Residual hazard controls include things like warning lights, markings, signage and other pedestrian or traffic control systems.

5.7 Design planned preventative maintenance instructions

Provide (or assess the existing) operation, maintenance manual (O&M).

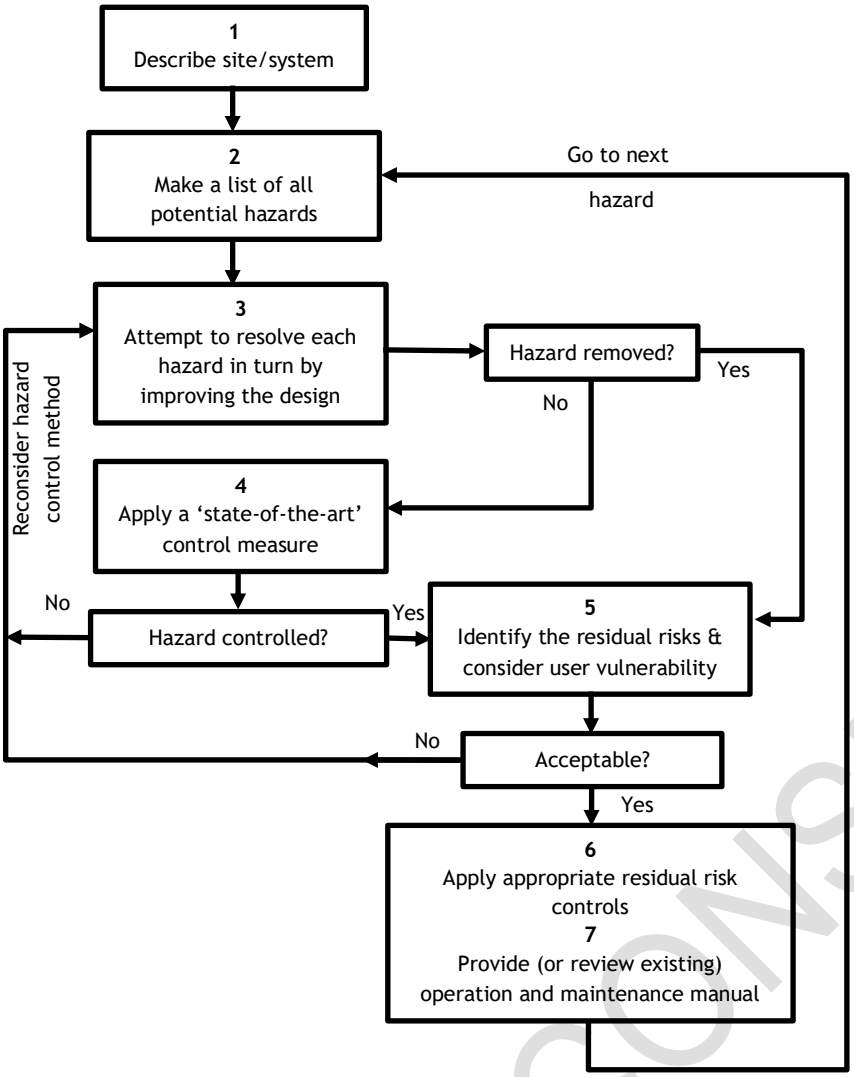
The user section should identify and explain the residual hazards. Safe use instructions should explain how to use the system and specify any user training necessary. There should also be a section that explains how the safety systems function, how to identify a fault and what to do/not do, including how to isolate the system and use it in manual.

The maintenance section should explain the steps necessary to keep the system in a safe condition. For example, the inspections, cleaning, lubrication, adjustment, routine parts replacements, and safety testing necessary. The manual should also describe the frequency, skills, qualification and experience necessary for each task.

5.8 Record the process

Record all seven steps and retain them for inclusion on the relevant technical or maintenance file. Annex A sets out one possible way of executing and recording this process. If this system is not used, any alternative method must achieve the same level of safety and clearly document all seven steps.

Compliance Assessment Process Flow Diagram



6 COMMISSIONING

The commissioning process is a series of inspections, checks and tests conducted to ensure a system is functioning correctly and safely prior to placing into service or returning to service following maintenance, repair or modification. The actual steps necessary will be dictated by the exact nature of the system in question but must in any case ensure it is safe before leaving in service. The commissioning process is a combination of following manufacturer's installation instructions and checks to ensure that all hazards present have been identified, prevented, controlled or reduced correctly and that nothing has been missed.

The process must cover at the very least the following areas, but also assess every possible critical element based on the site, environment, design, user profile and client requirement.

6.1 Structural Integrity

- Foundations, structures, supports, welding and fixings are secure and resilient
- Guides, tracks, rollers and hinges are secure and resilient
- Travel stops secure, properly aligned and resilient
- Safety distances to prevent crush hazards correct (measure)
- Enclosures and fencing is secure and has the correct safety clearance/aperture size

6.2 Electrical Safety

- Supply is tested or has been certified by a RECI electrician
- Earth connections present and continuity to earth is tested
- Isolation is functional and securable in the off position where required
- Cabling is secure and protected mechanically
- Wire terminations correct and secure
- All cable entries are sealed
- Enclosures are sealed and secured by key or tool
- Dangerous voltage labels in place
- Polarity, continuity, insulation, earth fault loop, RCD function etc. are tested
- Safety device wiring achieves category 2 or 3 as installed

6.3 Functional Tests and Settings

- Guides, rollers and hinges operate smoothly and maintain the correct level
- Limit switches are properly set
- Operating logic correct for safety in use
- Safety device function and system response correct
- Photo beam function and response correct
- Wicket gate switches operate the stop function
- Loop detectors operate the correct command
- Intercoms, keypads, key switches, buttons, transmitters etc. operate the correct command
- Overall, that the system operates as designed and as required by the client

6.4 Performance Tests

- Hold-to-run overtravel (measure)
- Light grid or laser scanner etc. performance (test piece)
- Force limitation(force test)

6.5 Warning Devices, Signage and Markings as per Risk Assessment

- Warning lamps function and are visible
- Audible warning devices function correctly
- Road markings in place and visible
- Warning signs in place, visible and comprehensible
- Pedestrian railings in place and secure
- Pedestrian routes marked and visible

6.6 Risk Assessment

- All hazards identified and recorded
- All hazards correctly controlled
- Residual hazards correctly identified and recorded
- User warnings identified and residual hazards explained
- Safe use instructions reflect the residual hazards
- Maintenance instructions adequate

6.7 User Information

- User training completed
- User warnings provided and explained
- User instructions provided and explained
- Maintenance instructions provided and explained
- Declaration of Conformity provided (new systems)
- Certificate of compliance provided (existing systems)
- CE label fitted, visible and contains the correct information
- Commissioning completed and signed off
- Site left clean, tidy and all waste material properly disposed of

7 LEGAL COMPLIANCE

7.1. New and Extensively Modified Systems

7.1.1. Harmonised European Standard

A Harmonised standard is a European standard (EN) which is recognised by the European Commission as conferring a presumption of conformity with legislation on a product complying with the standard. There are two standards currently harmonised with the Machinery Directive covering systems within the scope of this requirements document:

- EN13241, Gates and Barriers primarily for vehicle use but also accessed by pedestrians
- EN12978, Sensitive devices for gates, doors and barriers

7.1.2. Machinery Directive

Compliance with the Machinery Directive (currently 2006/42/EC) is mandatory for the organisation who manufactures or brings an automated gate or barrier into service for the first time due to the European Communities (Machinery) Regulations 2008 in the Republic of Ireland

Previous versions of the directive have been in force without any significant change to the applicable Essential Health and Safety Requirements set out in Annex 1 of the directive:

1. Foreseeable misuse
1.1.2. Principles of safety integration
1.1.3. Materials & products
1.1.5. Design of gates/barriers to facilitate handling
1.2.1. Safety & reliability of control systems
1.2.2. Activation devices
1.2.3. Starting
1.2.4. Stopping
1.2.6. Failure of power supply

1.3.1. Stability of foundations
1.3.2. Risks of break up during operation
1.3.4. Risks due to surfaces, edges or angles
1.3.5. Risks related to combined machinery
1.3.6. Risks related to variations in operating conditions
1.3.7. Risks related to moving parts
1.3.8. Choice of protection against risks from moving parts

1.3.9. Risks of uncontrolled movements
1.4.1. General requirements of guards
1.4.2.1. Special requirements for fixed guards

1.4.3. Special requirements for protective devices

1.5.1. Electricity supply

1.5.4. Errors of installation

1.5.14. Risk of being trapped
1.5.15. Risk of slipping, tripping or falling
1.6.1. Machinery maintenance
1.6.2. Access to operation position & servicing points
1.6.3. Isolation of energy sources
1.7.1. Information
1.7.1.2. Warning devices

1.7.2. Warnings
1.7.3. Markings

A new or extensively modified automated system must conform to the Essential Health and Safety Requirements of the directive, taking into account the current “state of the art” (recital 14). This will mean achieving or exceeding the level of safety prescribed in current product specific standards (**EN 12453**). The directive is written such that the state of the art can change as standards improve without the need for revision of the directive itself.

The organisation responsible for conformity is whoever first creates the system within the European Economic Area or who first imports it into the European Economic Area (EEA).

The following activities create a responsibility for legal compliance:

a) Manufacturing a complete automated gate or barrier within the EEA
b) Adding an electric operator to an existing manually-operated gate
c) Modify a complete system prior to or during installation in a way not permitted in the manufacturer’s instructions
d) Make an extensive modification to an existing automated system that alters the way it operates e.g.:
    - Changing from sliding to swing operation
    - Changing from ram operation to an underground operator system
    - Altering the opening width such that new leaves, supports or foundations are created
e) Assembling components from more than one manufacturer to make a complete gate or barrier, either on site or in your own workshop, e.g.:
    - Fabricate a gate and install an operator from a 3rd party supplier
    - Install a gate from one manufacturer with an operator from another
    - Buy a collection of components from a supplier not certified by them as a complete system
    - Buy components from multiple sources which you assemble

7.1.3. Risk Assessment

A risk assessment must be conducted that identifies and lists all potential hazards present and identifies which of the Essential Health and Safety Requirements are applicable:

a) The nature of the system and its intended use must be assessed
b) Wherever possible, the elimination of as many of the identified hazards as possible must be achieved by making design modifications to eliminate or reduce the danger
c) Any hazard that cannot be eliminated or adequately reduced by design changes must be reduced with a measure that achieves the current state of the art
d) Signage, warning devices etc. and safe use instructions must be designed to address any residual hazards.
e) Minor residual hazards must then be listed; hazards that can be eliminated or controlled by state of the art means cannot be declared and retained as residual hazards
f) A set of user warnings and safe use instructions must be created and supplied
g) Detailed maintenance instructions must be created and supplied

7.1.4. Partly Completed Machine

The machinery directive defines a partly complete machine (PCM) as:
"An assembly which is almost machinery, but which cannot itself perform a specific application. A drive system is partly completed machinery. Partly completed machinery is only intended to be incorporated into or assembled with other machinery or other partly completed machinery or equipment, thereby forming machinery."

The manufacturer of partly complete machinery must supply it with:

a) A Declaration of Incorporation under the Machinery Directive
b) Installation instructions for the PCM
c) Maintenance instructions for the PCM

The PCM must be in full compliance with and be CE marked under all applicable directives except the Machinery Directive; components in this category include electric operator and control panel combinations.

It is not permissible to supply a complete machine minus safety devices under a Declaration of Incorporation to avoid full compliance; such a machine would in fact be a complete machine without adequate safety.

7.1.5. Safety Device

The directive defines a safety device as:
"A component which serves to fulfil a safety function, which is independently placed on the market, the failure and/or malfunction of which endangers the safety of persons, and which is not necessary in order for the machinery to function, or for which normal components may be substituted in order for the machinery to function."
The manufacturer of a safety device must CE mark the device under the Machinery Directive and ensure that it is in full conformity with the applicable Essential Health and Safety Requirements. It must be supplied with a Declaration of Conformity under the directive and also be in full conformity with all other applicable directives e.g. Electromagnetic Compatibility and Radio Equipment Directives, components in this category are:

- Safe edge and any associated control device
- Light grid, laser scanner etc. and any associated control device.

As sensitive devices are listed in Annex iv of the directive, they must either be manufactured in full conformity with the relevant harmonised standard (EN 12978) or be subject to type testing by a test laboratory notified by the European Commission to test safety devices under the Machinery Directive.

7.1.6. Maintenance Instructions

Detailed planned preventative maintenance instructions must be drawn up by the assembler or installer of the completed system and supplied to the client, the instructions must accurately describe the:

- Inspections
- Cleaning

- Lubrication
- Adjustment
- Replacements
- Testing
- Required frequency of maintenance

The maintenance instructions must specify the required frequency of maintenance and the qualifications, skills and experience needed to execute the required maintenance tasks.

7.1.7. Safe Use Instructions

Instructions that identify and explain the residual hazards and how to safely use the system must be drawn up and supplied to the client. They must include electrical isolation, manual use, what to do in the event of a fault or damage and how to change batteries etc.

7.1.8. Declaration of Conformity (see Annex D)

The completed system must be supplied with a Declaration of Conformity that declares conformity with the Machinery Directive, and all other relevant directives, see Annex D.

7.1.9. CE Mark

The system must bear a CE plate that includes:

- Manufacturer or assembler name and address
- Product designation or serial number
- 2006/42/EC
- The year of manufacture

Mounted visibly and indelibly on the system see Annex D.

7.1.10. Technical File

The organisation responsible for compliance of a new or extensively modified automated system must compile a technical file and retain it unchanged for at least 10 years after installation, to evidence the entire compliance process. The file must be assembled and provided on request from relevant authorities. There is no requirement to share the technical file with the client. Technical files may be held with references to sites and or products and not clients in order to avoid possible conflict with data protection legislation.

the technical file must contain at least:

a) Technical drawings and specifications for the structure, foundations and safety critical elements such as hinges, guides, stops and fixings

b) Calculations for loadings

c) Detailed instructions for installation and commissioning that include any testing required

d) The risk assessment

e) The list of residual hazards

f) A list of standards or parts of standards that are being relied on as evidence or part evidence of compliance

g) Test reports from 3rd parties (where used)
h) A copy of the Declaration of Incorporation for any partly complete machine components used
i) A copy of the Declaration of Conformity for any safety devices used
j) Force test report (where force limitation is used)
k) Light grid or laser scanner etc. test report (where presence detection is used)
l) Electrical test certificates and reports
m) A copy of the installation manuals for all components used
n) A copy of the user warnings and safe use instructions
o) A copy of the planned preventative maintenance instructions
p) The Declaration of Conformity

Companies involved in repeat use of components (e.g. PCMs and safety devices) must operate and maintain a production control system; the system need not be independently certified (e.g. to ISO 9001) but must be comprehensive, documented and maintained to ensure that compliance and documentation keeps pace with any supplied product changes. See Annex G.

7.1.11. Obligations

Where a system is installed by a person engaged in a trade, business or other undertaking (whether for profit or not), then that person will have duties under the Safety, Health and Welfare at Work Act 2005 to ensure the resulting system is safe.

The Safety, Health and Welfare at Work (General Applications) Regulations 2007 also require that electrical systems are installed to prevent electric shock and fire due to electrical faults. The regulations also dictate that electrical work is only conducted by persons who possess the knowledge or experience, or are working under such degree of supervision as may be appropriate, to prevent harm. Live working must be avoided wherever possible.

In appropriate cases, a charge of reckless endangerment under the Non-Fatal Offences Against the Person Act 1997 may be considered.

7.2.Existing Systems – Repair, Maintenance and Modification

7.2.1. The Management of the Maintenance Process

There will be some variance about just how unsafe a given system may be. However, where children or untrained persons are potentially affected, the emphasis of the risk assessment must be on degree of harm rather than likelihood of occurrence; in many cases, it is foreseeable that children could play on or around these systems or that untrained persons might encounter them. In making a determination an assessment should result in one of two outcomes, that the system is either safe or not safe in accordance with the relevant standard or code.

Despite this, it is possible to discriminate to some degree and not all hazards will necessarily result in a system needing to be taken out of service:

- Where a hazard is classified as “safety critical”, the system must not be returned to service by a maintenance contractor or, for that matter, by a system manager.
- Where a hazard is classified as “requiring improvement”, the system could possibly be left

in service at the discretion of the maintenance contractor and/or the system manager.

In either case, a system manager must be fully informed, and an unsafe system notice (see Annex E) issued. Where a hazard has been classified “requiring attention” and the system is left in service, the system manager remains potentially liable to criminal prosecution or civil legal action in the event of a near miss or injury incident and hence must be given the opportunity to take the system out of service.

Organisations must observe the following process to manage maintenance, repair and modification works.

7.2.1.1. Step 1 – Inform the Client

Before going to site, the maintenance contractor must explain to the system manager that, as a duty of care to themselves, the system must be taken out of service for initial electrical and structural safety checks prior to the actual work or assessment process and, that if during maintenance or assessment work, the system proves to have safety critical defects, it will not be put back into service by the maintenance contractor.

7.2.1.2. Step 2 – Assess the Work

Once on site, the maintenance contractor must assess the system for safety before starting work, in so far as is possible in its current condition. The maintenance contractor must also assess the extent of work requested to be done by the system manager in terms of its likely impact on the safety of the system.

If assessment in safety is not possible due to lack of access, a System Safety Unknown (see Annex F) notice must be issued.

If step 2 reveals that the system will be safe on completion of the proposed work, then the maintenance contractor can continue with the contracted work. If it subsequently becomes obvious during the work that the system will have safety critical defects on completion, the maintenance contractor must not put the system back into service.

If step 2 reveals that the proposed work will not result in a safe system:

a) The maintenance contractor must explain all the exposed hazards to the system manager, verbally and, as soon as possible, in writing.

b) The maintenance contractor must also explain to the system manager what additional work (if any) might be necessary to properly diagnose the hazards; it may prove necessary to replace or adjust drive units, control boards, hinges or rolling gear etc. or work to gain access before a complete assessment is possible.

The maintenance contractor must inform the system manager in writing of the measures that will be necessary to make the system safe.

7.2.1.3. Step 3 – Complete the Work

The maintenance contractor must then request clearance from the system manager to complete both the contracted work and the required safety upgrade work.

If the system manager requires that the maintenance contractor completes only the contracted maintenance work the maintenance contractor must not put a system with “safety critical”

defects back into service. The contractor may only leave a system with "requiring improvement defects" in service with written permission from the system manager.

The maintenance contractor must explain to the system manager how service can be restored (e.g. explain where the switch is or how it has been secured against collapse). In this case, it would be reasonable for the contractor to assume that the required safety upgrade work is intended to be undertaken later. The contractor must also inform the system manager in writing (using the unsafe system notice) that there could be legal consequences for them in the event of an incident involving the system if it is returned to service in its current state.

7.2.1.4. Step 4 – Subsequent Visits

If, on a subsequent visit, the maintenance contractor finds the system is still in service in an unsafe condition, the process must be repeated and the system manager re-informed in writing of the potential hazards and of the potential consequences present, using the unsafe system notice. The maintenance contractor must not be the person who puts the system back into service with safety critical defects at any stage.

7.2.1.5. Mitigating Action

Although a maintenance contractor must never put a system with safety critical defects back into service, in many cases, a system could revert to manual use or be controlled in hold-to-run in order to maintain security at the site. This may not be undertaken where the problem is potential structural failure.

7.2.1.6. Conclusion of the Process

When informing system managers about defects affecting a system, it is important that the information outlining the defects is not confused with a quote to improve it. Accordingly, two separate documents should be provided. The unsafe system notice must not be ambiguous in any way. This requirements document requires the use of specific document templates to cover the informing of safety element of the process (see Annex E & F).

If a maintenance contractor continues to arrive at a site repeatedly to find that the system is still in use with safety critical defects and if, at the third visit to the site, the system manager is still resisting safety improvements, then the maintenance contractor should request in writing a formal meeting with the system manager to discuss their ongoing intentions for safety of the system and to explore the possibility of staged improvements or other hazard mitigation strategies.

7.2.1.7. Maintenance File

The maintenance file is a record of completed maintenance and alterations to a system throughout its life. Where a maintenance file is located in the same place as a technical file care must be taken to avoid any confusion between the two records.

The maintenance file must include the following:

- A copy of the maintenance contract or service agreement
- A copy of the current Planned Preventative Maintenance instructions (where PPM is contracted)

- The risk assessment for initial take-over of maintenance or reactive first visit
- The risk assessment for any alteration
- The maintenance log (or a copy of it where it is retained by the system manager)
- Declarations of Conformity or Incorporation for safety device or partly complete machine replacements
- A copy of installation manuals for parts replacements (where they differ from the original)
- A copy of updated user instructions issued as a result of alterations
- A copy of unsafe system notices issued
- A copy of the certificate of compliance
- Copies of any other relevant communication with the client

7.2.1.8. Maintenance Frequency and Content

Maintenance frequency and content must in the first instance be specified by the manufacturer or assembler of the complete system. In the absence of a specified frequency and content or if the specified schedule of maintenance proves inadequate, the maintenance contractor must design a maintenance schedule that is judged suitable to keep the system in a safe condition. Where the system manager disputes or refuses a revised schedule, this must be treated as a “requires improvement” hazard and notified to the system manager in the manner outlined in this section.

Force limitation, light grids and laser scanners etc. must be performance tested at least annually but need not be tested at every maintenance visit (providing that function is checked) throughout the year unless changes are made that might alter performance e.g.:

- When safe edges are replaced with a different type or size
- When a control panel that has torque adjustment is replaced
- When a drive unit or optical device is replaced

ANNEX A - Automated Gate or Barrier Compliance and Residual Risk Assessment

Company name:
Company address:
Job reference:
Site address:

Site & system description

☐ New ☐ Repair ☐ Planned maintenance ☐ Modification

☐ Swing ☐ Sliding ☐ Folding ☐ Barrier

Other:

Number of leaves: Leaf 1 width: Leaf 2 width:

Material: Height: Weight:

Percentage infill: Expected operations per hour: and per 24-hour period:

Terrain:

☐ Paved ☐ Unmade/gravel ☐ Sloping ☐ Kerb crossing ☐ Crowned road

Weather conditions:

What weather conditions will the system be exposed to?

☐ Inside location ☐ Outside location ☐ Sheltered ☐ Exposed

Estimated maximum wind gust speed:

Other:

Activation methods:

☐ Hold-to-run ☐ Free exit button ☐ Loop free exit ☐ Radio fob

☐ Keypad entry ☐ Intercom ☐ Proximity access control ☐ GSM/phone activation

Other:

Users and others who may encounter the system:

☐ No untrained persons present ☐ Untrained persons could be present

☐ High numbers of vulnerable persons present

Nature of vulnerable persons:

Reason/location for vulnerable persons:

Hazard list

Generic hazards present with all systems are suggested, the other more system specific hazards must be added, some guidance is shown in brackets. Users of this template should edit the fields as required.

	Hazard description
1	***Foundations and supporting structures*** *(derailment or collapse due to supporting masonry, post, foundation or fixing failure)*
2	***Leaf structure*** *(derailment or collapse due to gate leaf or barrier arm failure)*
3	***Hinge, guide or rolling gear*** *(derailment or collapse due to hinge, guide wheel, cantilever carriage failure)*
4	***Travel stop*** *(derailment or collapse due to the absence or failure of physical travel stops in manual or powered use)*
5	***Wind load*** *(derailment or collapse due to wind load)*
6	***Fall-back*** *(vertically acting doors)*
7	***Electrical faults*** *(earthing, cable and wiring faults etc)*
8	***Control system faults causing loss of safety*** *(safe edge, light grid, laser scanner, wicket gate switch, limit switch control system faults)*
9	***Crush at the leading edge*** *(gates and barriers)*
10	***Impact in the swept area*** *(gates)*
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	

Hazard controls

Use the hazard numbers from the hazard list and describe how the hazard has been eliminated, reduced or controlled by state-of-the-art means, giving priority where possible to safe design, edit as required.

Hazard control measure applied/recommended *(delete as applicable)*	
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	

Residual risk description		Residual risk control measures applied/proposed
1	*The system will become unsafe if not correctly maintained.*	*Provide suitable planned maintenance instructions.*
2	*Users may not be aware of residual hazards and may not know how to use the system safely.*	*Provide suitable user warnings and instructions.*
3		
4		
5		
6		
7		
8		
9		
10		

☐ **Operation and maintenance instructions suitable**

Declaration

Completed by: **Signature:**

Date:

ANNEX B - Explanations of Essential Health and Safety Requirements

1. Foreseeable misuse:
Must be considered and provided for in the risk assessment.

1.1.1 Principles of safety integration:
The system must be designed in the following order:

a) Safe design used wherever possible to eliminate hazards
b) Safety systems/devices must be applied for hazards that cannot be designed out
c) Warnings must be provided for minor residual hazards

1.1.2 Materials & products:
All materials must be suitable for use and environment, oils and other hazardous substances must be properly contained.

1.1.3 . Design of machinery to facilitate handling:
Manufacturers of complete systems must provide a lifting plan for their clients.

1.2.1. Safety & reliability of control systems:
A Declaration of Incorporation must be present from the control system manufacturer and the relevant installation manual followed. All cabling must be protected against damage, voltage bands separated, cable size appropriate for current and volts drop, IP ratings and cabling appropriate for environment.

1.2.2. Control devices:
Must be safely placed and activate a safe response.

1.2.3. Starting:
Not possible when a safety device is activated where that would result in dangerous movement.

1.2.4. Stopping:
There must be no automatic re-start after stop command, stop must override all other commands. Emergency stop is not normally required on fully automatic systems because activation of stop by an untrained person can cause trapping where the existing safety system would have provided adequate safety (stop and reverse).

1.2.6. Failure of power supply:
Loss of power must not present danger to users, e.g. provision of manual release, battery backup or non-locking drives. Use of the system in manual must be safe and the system must be safe if power is restored unexpectedly.

1.3.1. Stability of foundations:
Foundations, supporting structures, fixings, leaves, guides, rollers, stops, hinges and foundations must be designed to withstand 2 x the actual load without permanent distortion.

1.3.2. Risks of break up during operation:
Supporting structures, fixings, leaves, guides, rollers, stops, hinges and foundations must be designed to withstand 3.5 x actual loading without failure. No single component failure can be allowed to cause a dangerous situation.

1.3.4. Risks due to surfaces, edges or angles:
All sharp edges and hooking hazards must be removed or protected.

3.5. Risks related to combined machinery:
Control system integrity must be maintained when combining systems, e.g. bollards and gate systems from differing manufacturers. When this is done by an installation contractor, they have become the modifier of a control system and must ensure compliance with EH&SRs 1.2.1.

1.3.6. Risks related to variations in operating conditions:
The expected wind load must not compromise safety.

1.3.7. Risks related to moving parts:
All moving parts hazards must be identified in the risk assessment.

1.3.8. Choice of protection against risks arising from moving parts:
Hazards identified in 1.3.7 must be controlled in line with this requirements document.

1.3.9. Risks of uncontrolled movements:
No single component failure can be allowed to cause dangerous movement e.g. sliding gate on a slope.

1.4.1. General requirements of guards:
Mesh size and horizontal clearances must be appropriate, securely fixed and made anti climb.

1.4.2.1. Special requirements for fixed guards:
Only removable by key or tool, fixings must be retained on the guard when it is removable for maintenance.

1.4.3. Special requirements for protective devices:
Sensitive devices must only fail to safe, by good wiring practice and using devices in conformity with EN 12978 that achieve category 2/3 as installed.

1.5.1. Electricity supply:
The supply must be provided, tested and certified to IS 10101. All cabling wiring and earthing must be provided and tested to the state of the art e.g. EN 60204-1.

1.5.4. Errors of installation:
Instruction manuals must be followed by competent, trained, skilled fitters. All work must be inspected and tested on completion.

1.5.14. Risk of being trapped:
Manual release must be provided as appropriate.

1.5.15. Risk of slipping, tripping or falling:
Must be identified and controlled, residual hazards must be highlighted and explained in the user warnings.

1.6.1. Machinery maintenance:
Detailed maintenance instructions must be specified in the planned preventative maintenance instructions, including the required maintenance frequency.

1.6.2. Access to operation position & servicing points:
Access for maintenance in safety must be provided.

1.6.3. Isolation of energy sources:
An electrical isolator must be provided within sight of the system or made lockable on the off position. Isolators must be “all pole” design switching line and neutral conductors.

1.7.1. Information and warnings:
Warning signs and ground markings must be provided where identified in the risk assessment.

1.7.1.2. Warning devices:
Must be provided where identified in the risk assessment, e.g. flashing lights, traffic lights and sounders etc.

1.7.2. Warning of residual risks:
Must be explained in the user instructions and warnings.

1.7.3. Marking of machinery:
The system must be marked visibly, legibly and indelibly with the following minimum particulars:

a) Business name and full address of the manufacturer
b) CE mark and 2006/42/EC
c) Serial number
d) Year of manufacture/installation
e) Electrical hazard labels where required.

1.7.4. Instructions:
User instructions and warnings must be carefully compiled and passed to the client along with the required user training and demonstration.

ANNEX C - Certificate of Compliance

Job reference:

Site address:

Postcode:

Reason for issue: ☐ Maintenance ☐ Repair ☐ Modification

Structural integrity

☐ Foundations, supports, welding and fixings are provided secure and resilient

☐ Guides, tracks, rollers and hinges are secure, aligned and resilient

☐ Travel stops secure, properly aligned and resilient

☐ Resistance to wind load correct for environment

☐ Safety distances to prevent crush hazards correct

☐ Fence enclosures secure and have the correct safety clearances

Electrical safety

☐ Earth connections correct and secure

☐ Wire terminations correct and secure

☐ Enclosures and cable entries sealed

☐ Supply conforms to ET 101

☐ Isolation is functional

☐ Cabling is secure and protected mechanically

☐ Cable sizes and specifications correct

☐ Dangerous voltage labels in place

☐ Conductive metalwork continuity to earth is tested

☐ Electrical tests completed

☐ Safety devices achieve category 2 or 3 as installed

Functional tests and settings

☐ Limit switch/system properly set

☐ Safety device function and response correct

☐ Wicket gate/door switches operate the stop function

☐ Operating logic correct for safety in use

☐ Photo beam function and response correct

☐ Loop detectors operate the correct command

☐ Intercoms, keypads, key switches, buttons, transmitters etc. operate the correct command

☐ The system operates as designed

Safety performance tests

☐ Hold-to-run overtravel measured

☐ Non-contact presence detection systems tested

☐ Force limitation tested

☐ Force test results assessed and indicate safe force at all hazards protected by force limitation

Warning devices, signage and markings

☐ Warning devices, signage and markings provided as per the residual risk assessment

☐ Warning lamps function correctly ☐ Audible warning devices function correctly

☐ Road markings in place and visible ☐ Warning signs in place, visible and comprehensible

☐ Pedestrian barriers in place and secure ☐ Pedestrian routes marked and visible

Compliance assessment

☐ All hazards identified ☐ All hazards correctly controlled

☐ Residual risks correctly identified ☐ User warnings explain residual risks

☐ Safe use instructions reflect the residual risks

Maintenance

☐ Maintenance instructions adequate ☐ Maintenance interval adequate

☐ Maintenance tasks completed Maintenance interval …… months

User information

☐ User training completed ☐ User warnings provided and explained

☐ User instructions provided and explained ☐ Maintenance instructions provided and explained

☐ Maintenance log provided (new systems) and updated (existing systems)

On the date indicated this system is safe and at that time satisfied the legal obligations of both the owner and the maintaining company.

Completed by: …… Signature: …… Date: ……

Position: ……

ANNEX D - Declaration of Conformity & CE Mark

Organisation: ……	Address: ……

Declaration of Conformity

Description & unique identification number: ……

The organisation above declares under its own authority that the system above is fully compliant with:

- ☐ 2006/42/EC – Machinery Directive

The organisation additionally declares under its own authority that the system is in full compliance with the following directives:

- ☐ 2014/30/EU – Electromagnetic Compatibility Directive (EMC)
- ☐ 2014/53/EU – Radio Equipment Directive (RED)

Place and date of declaration: ……

Name & signature of the responsible person: ……

Organisation:	Address: ……
CE 2006/42/EC	**Year:** …… **Description:** …… **Unique identification no:** ……

ANNEX E - Unsafe System Notice

Dear: …… **Job reference number:** ……..……

System type: .……

Reference: .……..…

Location: …… **Date:** ……..……

In our opinion, the above system is currently not safe for operation.

Continued use of this system may result in damage to property or injury to users or members of the public generally. Overleaf is a list of faults we consider necessary to be rectified before the system can be regarded as safe in operation. We also attach an estimate of the cost of this work if undertaken by us.

You are reminded that, as the system manager, you have a legal duty of care to users and to visitors to the premises (including trespassers). If the system is not maintained in a safe condition, any party whose property is damaged, or who is injured by the system is likely to be able to sue for damages. If you have insurance covering such risks, your insurance contract is likely to oblige you to disclose material facts to your insurer such as, in this case, the fact that the system is not considered safe.

Depending on location and use, there may well also be responsibilities for the system manager under health and safety law (see over for details). Failure to meet duties imposed by health and safety legislation could result in criminal proceedings.

Due to our own responsibilities under criminal law as a system maintainer, we are unable to leave a system with "safety critical" defects in service. Where a system has lesser safety issues that are rated as "requiring improvement", we may leave the system in service at your discretion. Where a system with defects requiring improvement is left in service, there may well still be legal liabilities for the system manager in the event of an incident resulting in damage to property or injury. We strongly advise that all safety related defects are resolved with immediate effect to protect the interests of both the system manager and users of the system.

The system has been left: ……

(eg "*switched off", "set to hold to run control", "as found", "secured against collapse" etc*)

Yours faithfully: …… Signature: ……

Applicable Legislation

The actual document used shall contain a list of applicable legislation at this point (as indicated in section 7 of this requirements document), for efficiency the list has not been replicated here.

Exposed system hazards: SC = Safety Critical / RI = Requiring Improvement

1. **SC/RI: ……**
2. **SC/RI: ……**
3. **SC/RI: ……**
4. **SC/RI: ……**
5. **SC/RI: ……**

ANNEX F - System Safety Unknown Notice

Dear: …… **Job reference number:** ……

System type: ……

Reference: ……

Location: …… **Date:** ……

We are unable to gain access to some safety critical elements of your system.

As part of routine maintenance, repair or modification works we need to gain access to the safety critical areas of your system for inspections, adjustments, cleaning, lubrication or testing. Without this access we are unable to ascertain the safety of your system and hence are unable to determine whether or not it is safe to use.

Continued use of the system could result in damage to property or injury to users or members of the public generally. You are reminded that, as the system manager, you have a legal duty of care to users and to visitors to the premises (including trespassers).

If the system is not maintained in a safe condition, any party whose property is damaged, or who is injured by the system is likely to be able to sue for damages. If you have insurance covering such risks, your insurance contract is likely to oblige you to disclose material facts to your insurer such as, in this case, the fact that safety of the system could not be ascertained.

Depending on location and use, there may well also be responsibilities for the system manager under health and safety law (see over for details). Failure to meet duties imposed by health and safety legislation could result in criminal proceedings.

Due to our own responsibilities under criminal law as a system maintainer, we are unable to leave a system in service where we cannot ascertain its safety. If a system is left in service where the safety of it cannot be ascertained, there may well be legal liabilities for the system manager in the event of an incident resulting in damage to property or injury. We strongly advise that you arrange for structural alterations that will make routine access for maintenance of your system possible with immediate effect to protect the interests of both the system manager and users of the system.

We would be happy to advise what access is necessary.

The system has been left: ……

(e.g. *"switched off", "set to hold to run control", "as found", "secured against collapse" etc.*)

Yours faithfully: …… **Signature:**……

Applicable Legislation

The actual document used shall contain a list of applicable legislation at this point (as indicated in section 7 of this requirements document), for efficiency the list has not been replicated here.

ANNEX G - Factory Production Control (FPC) Checklist

This section highlights some of the areas for consideration when designing a Factory Production Control system as an alternative to a full ISO 9001 system. An FPC system is needed wherever manufacture of gates or traffic barriers occurs.

General

- Are written procedures/work instructions issued to the shop floor?
- Are they “controlled” so that updates can be consistently applied?
- Identify the documents relevant to the product(s) being CE marked
- Do you directly control the machinery used to manufacture the product?
- If not, and you use a sub-contractor, what controls are in place?

Personnel

- Who is the management representative in overall charge of FPC and with responsibility for ensuring that its requirements are applied?
- Are the personnel involved in production qualified and trained to operate and maintain the equipment and carry out production line duties?

Equipment

- Is maintenance of the process machinery carried out to written procedures at regular intervals?
- Are the results recorded?
- Is the inspection equipment correctly maintained and calibrated to ensure constant accuracy of tests performed during FPC?
- How is the frequency of calibration controlled?
- Are records kept?

Design

- Where relevant, are the responsibilities for the stages of the design process defined?
- Do procedures contain details of any design checks to be carried out?
- Raw materials and components
- What are the procedures/routines covering the purchase of raw materials and components?
- Do purchase orders detail specific requirements such as grade of steel or type of glass?
- Are specifications agreed with certain suppliers?
- Are any certificates of analysis or conformity requested from suppliers?
- Are batches of raw materials or components traceable through the production process and in finished products?
- If so, how is this traceability maintained?

Production Process Control

- How is the flow of production controlled? Are job sheets or works orders raised for each batch/day/week of production?
- How is progress recorded?
- What records are generated?
- Are all production processes and procedures recorded at regular intervals?
- Who records the processes?
- Is the recording automatic?
- How is the documentation organised?
- Is product testing carried out on site?
- If not, then where?
- Check test records for recent production. Do the results match the requirements of the technical specification?

Traceability and Marking

- How are product batches traceable through the production process and in finished products?
- What records are maintained of where the finished products are shipped?
- How is production batch number traceability maintained after dispatch to assist in traceability in the event of a complaint being received?
- How long are records kept?

Non-conforming Product

- Is there a documented inspection system that allows detection of defects before delivery?
- What proportion of products is inspected?
- How are any non-conforming products identified and stored?
- What records are kept?

Corrective Action

- Does the system include action to prevent future non-conformities?
- Who is responsible for:
- Investigating the cause of non-conformities?
- Correcting non-conformities?
- Is there an adequate documented system concerning complaints received about products and is the system integrated into the FPC?
- How are customer complaints addressed?

Handling, Storage and Packaging

- Are procedures in place for storing and handling raw materials, components and products to prevent damage and deterioration?

ANNEX H – Complete new system non-compliance process

When an installation company sources a system from a 3rd party supplier, they must be careful to understand what they have ordered. Have they ordered a disparate collection of parts, or a complete system? If a collection of parts was ordered, the installation company bears full responsibility for compliance. If a complete system was ordered, the importer, distributor, or manufacturer, whoever first placed it on the market, has responsibility for compliance.

Where there are residual hazards specific to the local environment, the site or the nature/vulnerability of users, the installation company must deal with them as part of the 'as installed' compliance assessment, at the residual risk stage.

There may be occasions where an installation company has been supplied with a complete system supported by declarations and CE marking, but the system appears to have some hazards that are not protected in line with the state-of-the-art.

Where this happens, it is important to understand the various roles and responsibilities under criminal or civil law:

1. The supplier of the complete system is responsible for compliance.
2. The installation company must follow the supplier's installation instructions.
3. The installation company has a duty to report any apparent non-compliance to the supplier, and ultimately to the client if the supplier declines to respond.
4. If the installation company makes safety improvements not authorised by the supplier, the installation company takes on responsibility for compliance and could suffer some loss of warranty cover.
5. The client has legal responsibilities if they choose to keep the system in service below the state-of-the-art.
6. There is potential for the installation company to bear legal liability when they fail to communicate any concern over the safety of a system to either the supplier or the client if they could reasonably have been expected to understand the issues at stake, e.g. they are qualified in the appropriate standards and legislation.
7. There are obvious conflicts of interest at stake when this happens, considerable care will be needed to protect the criminal, civil and commercial interests of all concerned parties; DHF offers the following advice:
    a. Contact the supplier in writing explaining the apparent non-compliance, listing the exposed hazards and requesting a state-of-the-art solution
    b. If refused, contact DHF if you are a member, or if the supplier is a DHF member; DHF will assist with negotiations and attempt to achieve an amicable resolution
    c. Where this action does not result in an acceptable solution, the installation contractor has three remaining options:
        - resolve the hazards with state-of-the-art modifications themselves and take over responsibility for compliance
        - report the apparent non-compliance to the relevant national authority, e.g. HSA
        - inform the client of the apparent unprotected hazards and allow the client to decide how they wish to proceed.