



Date: 17th June 2025

Subject: Inspection of devices under RPII Guidance Notes 10, 11, 12, 13

PIPA supports the development of publicly accessible standards to align and improve safety across the industry. Currently PIPA is being contacted by manufacturers, inspectors and controllers raising valid questions about the contents of these guidance notes and querying why PIPA has permitted the release of such guidance notes.

We wish to clarify that these guidance notes were not authored, issued, or approved by PIPA, at any point. PIPA was never consulted or given a preview of the documents. This is a given right by the author of the guidance notes, however there is industry perception that PIPA is the co-author, which is completely untrue.

Since the publication of the subject named guidance notes, the questions raised have demonstrated significant uncertainty across the sector. We write this public letter to help the answer questions raised by the industry, and to help reduce the volume of calls the PIPA office is receiving.

- These Guidance Notes were not written or passed to PIPA prior to their release.
- These devices fall, in the main, outside the scope of BS EN 14960 Parts 1–4.
- Guidance notes are not ratified standards, and do not carry regulatory or enforcement status. Guidance notes are legally tested as to the author of the guidance, and the level of evidence supporting such guidance.
- These documents includes a legal disclaimer in which it is intended only as general advice.
- It is not clear on the degree of training and examination conducted as part of the release of the guidance notes. The liability of ensuring competency of their inspection body and the safety of inflatable amusement devices is placed on the controller. Sufficient due diligence should be carried out by the controller as part of their usual business activities.
- In its current form, the guidance place inspectors in a difficult position. Devices have recently been failed under Guidance Notes despite:
 - Being accompanied by comprehensive manufacturer risk assessments and documentation;
 - Displaying no observable or structural defects;
 - Falling entirely outside the scope of current inspection standards.
- When inspection bodies issue a 'failed inspection report' to a controller, they are liable to any litigation brought about by a controller or a manufacturer in the absence of a fault in design or clear safety implication.

This has led to understandable confusion, loss of trust, and commercial disruption, and may expose inspectors to potential liability should any litigation be brought about against them.

PIPA would like to clarify that these guidance notes are the view of the author and organisation that has issued them. They do not form any part of the requirement of an inspector under the PIPA scheme. Any questions should be directed to the author and not PIPA.

For inspectors solely registered with the PIPA scheme, PIPA does not recommend you take reference from these documents at this time in their current structure. For those inspectors who are members of both schemes, you should seek written advice from the author to ensure you are clear on your obligations and liabilities as an inspector and remain within the scheme rules of that body. You should also clarify with your insurer whether sufficient cover is in place to inspect devices under these guidance notes.

PIPA has a process for the release of guidance notes. The initial creation of a guidance note is drafted, before an internal review by the PIPA Leadership Group, to create a final draft for comment by PIPA members and the Health & Safety Executive, before the final version is released. When PIPA receives feedback about guidance notes, it has withdrawn the guidance until it is reviewed and updated accordingly.

PIPA inspectors are provided with structured training, and examination. The PIPA inspection hub website does not permit inspectors to undertake inspection of devices until they have passed the necessary examination. And feedback is provided to inspectors through the PIPA auditing process.

PIPA has previously offered advice to inspectors about competence and inspection of devices outside the scope of the PIPA scheme, and is available in its published document IS08:

<https://www.pipa.org.uk/media/10dbhlcb/scope-of-the-pipa-scheme.pdf>

Specifically, any inflatable beds associated with an electromechanical device (such as a rodeo bull, sweeper, or simulator) are a critical part of the device which needs to be considered as a whole. The inspection of inflatable beds separate to the electromechanical device has been raised by the Health & Safety Executive as insufficient, as they are seen to be a single amusement device in which all risks need to be considered. PIPA strongly advises inspectors to only inspect these devices in a way which they can consider all of the risks, and can demonstrate they are competent to do so.

PIPA advises its inspectors to continue to follow the advice provided in IS08 and only act accordingly where they are competent to do so.

Signed: The PIPA Leadership Group