

Workplace Safety in Facade Inspection: WSHA Compliance for Building Owners

Facade inspection safety singapore — practical guidance for building owners and managers

Facade Inspection Singapore — BCA-Approved Competent Person

Workplace Safety in Facade Inspection: WSHA Compliance for Building Owners

WSHA compliance for facade inspection in Singapore — owner, principal, employer, MA and CP duties under the Workplace Safety and Health Act explained.

A periodic facade inspection involves people working at height, often dozens of metres up, often outside the building line, sometimes on a gondola anchored to a roof structure that hasn't been load-tested in months. Facade inspection safety in Singapore is not just an internal contractor concern — under the Workplace Safety and Health Act (WSHA), the building owner is a duty holder, and so are the management agent, the principal, the employer of the inspector, and the inspector themselves. Getting this wrong has consequences measured in six- and seven-figure fines and, in the worst cases, custodial sentences.

This post sets out the WSHA framework that applies to facade inspection, explains who carries which duty under which contractual arrangement, and translates that into the risk-assessment discipline a competent inspection actually requires.

The WSHA in 30 seconds

The Workplace Safety and Health Act took effect on 1 March 2006. It covers all workplaces where a person is at work, and a facade inspection meets that definition. The Act imposes general and specific duties on different categories of duty holder, requires every workplace to take "reasonably practicable" measures to ensure safety and health, and gives the Commissioner powers to issue remedial orders, stop-work orders, and prosecute offences.

The WSHA framework rests on three principles:

- Reduce risks at source — emphasised by mandatory risk assessment under the WSH (Risk Management) Regulations

- Industry ownership of standards — performance-based rather than purely prescriptive, with the "reasonably practicable" standard
- Higher penalties for poor management — set high enough to deter risk-taking

Penalties under the Act are substantial: corporate offences under sections 11, 12, 14, 16 and 17 carry a maximum fine of S\$500,000; individual offences under section 15 (or 48 read with 50(a)) reach S\$200,000 and/or two years imprisonment; repeated offences causing death can reach S\$1 million for a corporate or S\$400,000 and two years for an individual.

Who is a duty holder during a facade inspection?

The WSHA defines five duty-holder categories that matter for a facade inspection.

Occupier — section 11

The occupier is the holder of the factory permit, or in any other workplace, the person who has control of the premises. For a facade inspection on a residential or commercial building, the occupier is typically the owner, the MCST, or the management agent. Under section 11, the occupier must take reasonably practicable measures to ensure that the workplace, the means of access and egress, and any machinery, equipment, plant, article or substance there is safe and without risks to health.

Employer — section 12

Any person who employs another under a contract of service. For a CP firm, the firm is the employer of the CP and any in-house Resident Engineer or RTO. Specific duties include providing and maintaining a safe work environment, ensuring adequate safety measures around machinery and process, ensuring no exposure to hazards under the employer's control, developing emergency procedures, and ensuring adequate instruction, information, training and supervision.

Principal — section 14 / 14A

A principal engages another person otherwise than under a contract of service to supply labour or do work for gain or reward. In facade inspection, an owner who engages an access-equipment supplier (gondola contractor) directly is a principal towards that supplier; a CP who engages an access supplier becomes a principal too. Principal duties include reasonably practicable measures to ensure safety of contractors and their workers where the principal directs the manner of work.

Self-employed — section 13

A self-employed person — for example, a freelance Façade Inspector or a Professional Engineer issuing a certificate — must take reasonably practicable measures to ensure the safety of any persons who may be affected by the undertaking.

Section 19 — Approved Code of Practice / Authorised Examiner duties for machinery

Where inspections rely on lifts, gondolas or other equipment regulated under WSHA subsidiary legislation, section 19 brings in additional duties. A gondola, for instance, must be tested by an Authorised Examiner (a Professional Engineer specially approved by MOM) at first installation and at least once every six months thereafter under the Approved Code of Practice CP 20 for suspended scaffolds.

Mapping contractual arrangements to WSHA roles

The same physical inspection can sit under any of several contractual arrangements, and the duty-holder mapping changes with each. Some common patterns from the MOM training material:

- Owner engages CP and access supplier separately — owner is principal towards both; CP is employer of in-house staff; access supplier is employer of riggers.
- Owner engages CP firm; CP firm engages access supplier — owner is principal towards CP firm; CP firm becomes principal towards the access supplier and employer of its own staff.
- Owner engages an MA who engages the supplier — MA carries section 19 duties; owner remains in the chain via section 14A.
- CP working as self-employed person — section 13 duties apply directly to the inspector.

The practical implication for owners is that you cannot subcontract your way out of WSHA. Picking a CP firm with a properly resourced safety management system is the most reliable single act of compliance an owner can perform.

Risk assessment — what the inspector actually does

Every facade inspection must be preceded by a risk assessment under the WSH (Risk Management) Regulations. The process is the standard Identify–Evaluate–Control loop, customised to the building.

Identify

Hazards are anything with the potential to cause bodily injury or ill-health, considered against the work activity, task and location. For facade inspection, the typical hazard inventory includes work at height, falling objects, gondola or MEWP failure, electrical hazards, heat stress, lightning, insects/snakes in less-trafficked areas, asbestos contact during sample-taking, and pre-existing facade defects (loose plaster, cracked tiles) that can be dislodged during inspection access.

Evaluate

Severity × likelihood, with the matrix calibrated to MOM's expectations. Severity 1 hazards require immediate elimination or substitution before work proceeds.

Control

The control hierarchy — eliminate, substitute, engineering controls, administrative controls, PPE — applies. For work at height, that means travel restraint where possible, fall arrest where not, and work positioning as a last line of defence. For gondola work, that includes the section 19 testing regime, proper anchorage design by a Professional Engineer, weekly re-inspection by a qualified suspended-scaffold supervisor, and 12-monthly winch inspection.

Common red flags during compliance review

- Risk assessment not signed off by the CP before mobilisation
- Method statement that doesn't match actual site conditions (for example, a gondola wire path that contacts a roof canopy)
- No record of pre-installation site inspection of the access equipment

- Workers without the WAH (Work at Heights) competency for their role
- PPE issued but not enforced (helmet straps undone, no shock-absorbing lanyards)
- Stop-work authority not given to inspectors
- No emergency rescue plan for a worker suspended in fall arrest

Singapore regulatory context

The compliance backbone is the Workplace Safety and Health Act 2006, with subsidiary regulations including WSH (Construction), WSH (General Provisions), WSH (Risk Management), WSH (Work at Heights), WSH (Scaffolds), WSH (First-Aid), WSH (Incident Reporting) and WSH (Approved Codes of Practice) Notification. For machinery testing, the Approved Code of Practice CP 20 applies to gondolas and suspended scaffolds. The BCA periodic facade inspection regime sits alongside WSHA, not above it — meeting the Building Control Act's PFI obligation does not relieve any party of its WSHA duties.

What to do next

Before your next facade inspection mobilises, ask three questions: who is the principal under section 14, who is the employer of every worker at height, and where is the signed-off risk assessment that says the access plan is reasonably practicable for this specific facade. If those answers are not on paper, the inspection isn't ready to start.

Author — Facade Inspection Singapore · BCA-Approved Competent Person Team. Inspections issued within 5 working days, with full WSHA-compliant risk assessment and method statement.

- Service overview: facadeinspection.com.sg
- Periodic facade & structural inspection: [Periodic Structural Inspection](#)
- Get a quote: [Contact our facade inspectors](#)

Sources & references

- Source training material: 4.1-Lim-Cheong-Facade-Handsout — Workplace Safety & Health in Façade Inspection (MOM).
- Building and Construction Authority (BCA) — Periodic Facade Inspection (PFI), Building Control Act and Building Control (Periodic Inspection of Buildings and Building Facades) Regulations 2021. www1.bca.gov.sg
- Ministry of Manpower (MOM) — Workplace Safety and Health Act 2006 and subsidiary regulations including WSH (Risk Management), WSH (Work at Heights), and WSH (Scaffolds) Regulations. www.mom.gov.sg
- Singapore Civil Defence Force (SCDF) — Code of Practice for Fire Precautions in Buildings 2023 Edition (effective 1 March 2024). www.scdf.gov.sg