

Fall protection & working from heights

The Occupational Safety and Health Administration's (OSHA's) Fall Protection standard focuses primarily on the construction industry. However, it pertains to all companies regardless of their operation if they perform work at heights. Although the standard falls under the Construction Industry, OSHA can use the Construction Fall Protection standard against any company if they identify a potential fall hazard. General Requirements for Fall Protection, 29 CFR 1926.501 and Training Requirements for Fall Protection, 29 CFR 1926.503 are almost always found on OSHA's Top Ten violations, year after year. It is essential to evaluate if your company falls under these standards.

Since the Fall Protection standard includes a large number of individual regulations, it is important to understand what the specific rules are that are commonly violated. Here are the top 5 sub-sections OSHA is citing companies for under General Requirements for Fall Protection.

29 CFR 1926.501, General Requirements for Fall Protection

- 1) 1926.501(b)(13) – States that anyone performing construction work at heights of 6 feet or more shall be protected from falls using approved guardrail systems, safety net systems, or personal fall arrest systems.
- 2) 1926.501(b)(1) – Employees working on platforms 6 feet or higher with unprotected sides or edges shall be protected by guardrail systems, safety net systems, or personal fall arrest systems.
- 3) 1926.501(b)(10) – Employees engaged in roofing activities on low-slope roofs with unprotected sides and edges 6 feet or more above lower levels shall be protected by use of a guardrail systems, safety net systems, or personal fall arrest systems.
- 4) 1926.501(b)(11) – Steep roofs that are 6 feet or higher from a lower level shall be protected from falling by guardrail systems with toeboards, safety net systems or personal fall arrest systems.
- 5) 1926.501(b)(4) – Holes- Each employee on walking/working surfaces shall be protected from falling through holes (including skylights) more than 6 feet above lower levels, by personal fall arrest systems, covers, or guardrail systems erected around such holes. Additionally, employees must be protected from tripping hazards and employees below must be protected from falling objects from holes.

These five citations tell us that if your employees are working at heights 6 feet or higher in the construction industry, you must have some type of fall protection. Keep in mind that this is for Construction. If you are in the General Industry, the height is 4 feet, the Shipyard Industry is 5 feet and the Longshoring Industry is 8 feet.

OSHA suggests three types of fall protection employers can use to protect workers.

- 1) *Personal fall arrest systems* – System used to safely stop (arrest) a worker who is falling from a working level. Specifics on Fall Arrest Systems can be found at 29 CFR 1926.502(d).
- 2) *Safety net systems* - Safety net systems are designed to catch a falling worker. Safety nets are intended to decrease the fall distance, absorb the energy of a fall, and reduce the likelihood or seriousness of an injury. Specifics on Safety Net Systems can be found at 29 CFR 1926.502(c).

- 3) *Guardrail systems* – Guardrail systems are barriers erected to prevent workers from falling to lower levels. Specifics on Guardrail Systems can be found at 29 CFR 1926.502(b).

29 CFR 1926.503, Training Requirements for Fall Protection

Here are the top five sub-sections OSHA is citing companies for under Training Requirements for Fall Protection.

- 1) 1926.503(a)(1) – Employees who are exposed to fall hazards must be appropriately trained on how to recognize and correct those hazards.
- 2) 1926.503(b)(1) – The written certification record shall contain the name or other identity of the employee trained, the date(s) of the training, and the signature of the person who conducted the training or the signature of the employer.
- 3) 1926.503(a)(2) – Employer shall ensure each employee has been trained, as necessary, by a competent person. (94) Competent Person - *one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.*
- 4) 1926.503(c)(3) – Inadequacies in an affected employee's knowledge indicate that the employee has not retained the required understanding or skill.
- 5) 1926.503(c) – Retraining. If you feel an employee does not have the understanding or required skill after training, they shall be retrained.

These 5 citations are telling us that employees were not trained in using fall protection, unable to identify a potential fall hazard and unable to retain the knowledge of fall hazards, even after the training. Additionally, employers failed to document training for employees.

Fall protection and training continue to be a serious problem in the workplace and they continue to appear on OSHA's Top Ten list. To identify potential hazards in your workplace or the job site, compare the citations above and see if your organization complies with them. If you identify any gaps, take the necessary steps to close those gaps, protect employees and minimize potential fines.

If you need help identifying potential hazards in your workplace, please contact Andy Sawan, Risk Services Specialist at Sedgwick at andrew.sawan@sedgwick.com or 330-819-4728.