

Fall Protection During a Pandemic

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Fall protection in construction is one of the most cited OSHA standards across all industries, with fall protection training in construction being the eighth most-cited. More importantly, falls constitute more than a third of construction deaths, dwarfing the next three causes combined. Outside of construction industries, falls remain a leading cause of citations and fatalities. Falls are the most dangerous hazard for American workers, which means that fall protection is the most important safety consideration for employers. Disappointingly, in late March this year the COVID-19 pandemic forced OSHA to postpone its Seventh Annual National Safety Stand-down to Prevent Falls.

Across the country, construction and much of general industry continues without pause through the pandemic; OSHA's national safety stand-down may be postponed, but employers cannot stop preventing falls. Although OSHA supplies a list of public safety stand-downs that people can attend, it also stresses that employers can conduct safety stand-downs at any time, using a toolbox talk or taking a work break. Copious amounts of information concerning fall protection is also available on <u>OSHA's website</u>, which provides employers with an easy place for stand-down guidance.

Most employers are trying to follow the fall protection regulations. They provide the right equipment and train their employees to use the equipment. The question then remains, how is fall protection continually the number one citation? We offer suggestions below to help reduce the lack of use of fall protection on job sites.

First, create a fall protection plan prior to anyone working at heights. The plan will cover how the job is to be performed and how employees are to perform each task while remaining tied in. Having a written plan helps ensure everyone understands what equipment is to be used and how. A good fall protection plan can help spot problems prior to workers being on the roof and running into areas where use of their fall protection appears infeasible.

Second, enforce a disciplinary policy when workers are found to not be using their fall protection equipment. Consistent enforcement of discipline for violating both the fall protection plan and your fall protection program shows employees that the use of fall protection while working at heights is a real requirement. Document your enforcement even if it only involves a verbal warning. From a legal perspective, consistent, documented discipline helps provide you a defense against fall protection citations. Many workplaces require social distancing on jobs at this time. Implementing a safety stand-down as part of a tool-box talk is a great way to bring people together during distancing. Contemplate small groups based upon your state or locality's guidelines or perhaps use different areas to conduct a stand down simultaneously across a worksite with multiple groups. Hold the stand down outside, where spacing is easier and virus transmission less likely. Videoconferencing isn't ideal but could be incorporated to increase attendance from management and corporate workers. Keep people engaged by buying pizza or snacks, providing awards, or raffling prizes. A stand-down may seem dull or difficult during a pandemic, but planning and creative ideas can make it effective, safe, and fun.

Lastly, conducting a safety stand-down specifically educates employees about fall protection, but it also shows them that their employer cares. Culture is perhaps the most important element for maintaining a safe workplace, but also the most elusive. Difficult to describe or understand, culture is even harder to create and maintain. Now, when many workers may be numb to warnings about COVID-19, other kinds of hazards still exist. Don't let efforts to prevent them relax.

Fall hazards during a pandemic also have the benefit of being real and immediate. Young, healthy workers face little risk and may not know anyone that COVID-19 affected. But fall hazards are easy to see, and workers in every industry are victims of falls. Focusing on fall hazard now is a good way to get workers' attention and focus upon a safety issues that they can see, control, and prevent.

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