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Fall Protection – More than just Harnesses

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Often complying with OSHA requirements to stop falls conjures images of harnesses, yo-yos and safety lines: these types of equipment are all necessary, but other standards also address falls without focusing upon fall protection equipment. Although OSHA most often cites standards requiring fall protection systems, it also enforces standards regulating ladders, stairways, and scaffolding to prevent falls, which are the deadliest construction hazard.

Each construction tool has a specific rule, requiring employers to comply with a slew of standards. Frequently, employers hire contractors to erect scaffolding for them because it is difficult to do correctly and safely. But employers usually manage, setup, and use ladders and stairways independently. A ladder requires more than just throwing it out and climbing, and stairways are not as simple as walking to the second floor in your house makes it seem. Here are some basic tips for preventing falls and complying with OSHA standards when employees use ladders and stairways.

Ladders come in a variety of forms including fixed ladders, step ladders, wooden ladders, non-self-supporting ladders, ladders made at jobsites, and even ladders like single rail ladders, which OSHA forbids. Stairway requirements include dimensions, a range of 30 to 50 degrees from the horizontal, and uniform depths. Requiring different precautions that OSHA provides, stairways and every kind of ladder pose unique hazards. Sections 1926.1051 and 1926.1060 cover general requirements for both ladders and stairways.

Training is likely the most important of these common standards. With some variance based upon the ladder or stairway, training should always follow the same basic requirements. First, the standards require training as necessary, which should be before an employee uses a ladder or stairway for the first time, at anytime where there is a near miss or fall on a site, and at new sites. Consider scheduling refresher training too. A competent person, who is qualified by experience or training, should administer training on:

- The nature of fall hazards in the work area;
- The correct procedures for erecting, maintaining, and disassembling the fall protection systems to be used;
- The proper construction, use, placement, and care of all stairways and ladders;
- The maximum intended load-carrying capacities of ladders and stairways;
- The standards in the applicable subparts.

It is important that the competent person specifically tailors training to the ladder, stairway, and workplace that workers will use. More specific is better. Trying to make this training interesting with examples of near misses or accidents is a good way to make workers understand the risks.

After training, the standards common to ladders and stairways focus upon when they are necessary. Once again, whether you use ladders or stairways and what type you use will depend upon the circumstances. You must use some form of ladder or stair when:

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- There is a personnel point of access where there is a break in elevation of 19 inches (48 cm) or more, and no ramp, runway, sloped embankment, or personnel hoist;
- When only one point of access exists between levels and equipment or work prevents free passage at that point, you must also establish a second point of access with a ladder or stairway. At least one point of access must be maintained to permit free passage of employees; and
- You identify work that requires installing stairways or ladders, which means before work *begins*. Installing respective fall protection systems must also occur at that time.

Inspecting ladders and stairways for visible defects is also something that you should task a competent person to perform. Although the standards require this inspection periodically and after any incident that could affect the safe use of ladders, inspecting stairways is also recommended.

Designing workplaces and planning tasks plays a big roll in preventing falls, which is why OSHA provides such specific ladder and stairway guidance. Whenever your feet leave the ground at work, think about preventing falls.

Authors: Kristin White and Ben Ross are attorneys with the law firm of Fisher Phillips LLP. Their practices are in the area of workplace health and safety working with clients throughout the country. Fisher Phillips is a national labor and employment law firm serving employers and is committed to providing the highest level of client service for every matter it handles. The firm has more than 430 attorneys in 37 offices, including a national workplace safety and catastrophe management practice to help with all OSHA, MSHA, crisis management and workplace safety needs.