

Working at Heights

PURPOSE: This policy establishes guidelines to prevent injury to employees engaged in work activities that expose them to potential falls from elevations of 4 feet (6 feet for construction) or more. This policy does not supersede any building code requirements.

TERMS & DEFINITIONS

Basic definitions:

- Active fall protection system: An active fall protection system is a dynamic fall protection system that require the use of special equipment and participation by the worker.
- Fall arrest system: A fall arrest system is a fall protection system used to safely stop (arrest) a worker who is falling from a working level. It consists of an anchorage, connectors, and a body harness. It also may include a lanyard, deceleration device, lifeline, or suitable combinations of these.
- Fall restraint system: A fall restraint system is a fall protection system that prevent the user from falling any distance. This system is comprised of a body belt or body harness, an anchorage, connectors, and other necessary equipment.
- Passive fall protection system: A passive fall protection system is a non-dynamic and stationary fall protection system that does not move or adapt or change when in or out of use and do not require the use of Personal Protective Equipment or active participation from the worker.

POLICY:

1. Each campus shall establish a fall protection program. At a minimum, the program will address:
 - a. Scope and applicability – where required, outline program requirement parameters and thresholds, consider:
 - i. A description of where protection in general is required; define a height threshold
 - ii. Situations where fall protection is not required, such working from ladders
 - iii. A description of where/when fall protection is required for rooftop work
 - iv. Requirements for use of scissor lifts and aerial (boom) lifts
 - b. Application of the safety hierarchy of controls when addressing fall hazards both during design of new facilities and in managing existing processes or operations fall hazards.
 - c. Roles, responsibilities and training
 - d. Provisions for coordinating unique contractor fall protection expectations as applicable
 - e. Program management, monitoring and review
2. When addressing fall hazards the preferred method of control in order of precedence is:
 - a. Passive fall protection (e.g. hand rails)
 - b. Fall restrain (e.g. a tie off, harness and lanyard that precludes approaching an edge)
 - c. Fall arrest (e.g. a tie off, harness and retractable fall arrest or shock-pack that prevents ground impact after a fall)
3. If personal fall arrest systems are used, the program shall specify:
 - a. Responsibilities of employees authorized to use personal fall arrest systems; indication that training is necessary before using PFAS (training can be documented elsewhere)
 - b. Requirements for anchorage points
 - c. Evaluation of total fall clearance distance, swing falls and specification of correct lanyards
 - d. Equipment inspection requirements
 - e. Rescue and emergency plans in event of a fall arrest
4. Qualifications: Other than where there passive fall protection exists, only qualified staff will be tasked to perform work at heights.
5. Means and methods to consider fall risks when planning work.

PROCEDURES & PRACTICES: Refer to confined space procedural guide for details. If after reviewing you have any questions, please reach out to EHS for clarification.

Resources: 29 CFR 1910 Subpart D, 29 CFR 1926 Subpart M.