

WHAT TO DO NEXT

So, you're aware of the rooftop hazards and the risks they pose. You know your obligations, and the potential impact on your people and on your business in the event of an incident. What are the next steps to take to gain a complete understanding of height safety risks on your own roofs?

Understand Work at Height Competency

As the person ultimately responsible for the safety of employees and in some cases the contractors on site, it's vital that you understand work at height competency. This will also help you to avoid the needless expense of 'over competence' - where unnecessarily qualified specialists are contracted for a task that does not require their higher level of expertise. Here's what you need to know:

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COMPETENT TO UNDERTAKE A TASK DOES NOT MEAN COMPETENT TO DO IT AT HEIGHT

There are different types of competence. A worker qualified to maintain HVAC systems may not be qualified to do so on your roof, using your height safety systems.

YOU NEED TO ASSESS YOUR BUILDING

Don't assume that appropriate height safety provision was made during the design and construction of your building. Just because it may be 'obvious' that you'd need regular roof access for your building type, doesn't mean this was included in the final build. You need to assess your current height safety systems, and understand how that determines who can access your roof safely.

YOU ALSO NEED TO ASSESS YOUR WORKERS

Competence to work at height is not a binary decision. There are different levels of competence, which will determine who can safely work on your roof based on its fall protection measures. For example, using elevated working platforms or rope access systems requires very specific skills and qualifications, whereas caged ladders and staircases can be used safely by a broader range of workers.

There are currently no set industry standards for individual work at height competence. Based on our extensive experience of roof work at **FIXFAST USA**, we have developed a simple four-tier classification for worker work-at-height competence:

Novice ● ● ● ●

- Almost no experience
- Negligible training
- Examples include typical office workers
- **Should not work at height in 'maintenance areas' under any circumstances**

Basic ● ● ● ●

- Occasionally works at height, but not regularly and experience is limited to a narrow range of scenarios
- Has had some fall protection training relevant to some means of access and protection in the last two years
- Is able to provide evidence of this training, and of recent related experience
- Examples include HVAC maintenance contractors and facility technicians

Advanced ● ● ● ●

- Regularly works at height, and has done so in many different scenarios
- Has had extensive training in using different means of safe access and protection systems, with multiple qualifications
- Can demonstrate extensive experience of work in similar roof scenarios over a number of years
- Examples include roofing contractors and experienced facility managers

Expert ● ● ● ●

- Works at height every day, and can make themselves safe in almost any situation
- Has extensive work at height qualifications including multiple specialist certifications
- Can provide logbooks showing regular training to maintain their qualifications, and will usually be a member of a relevant trade association
- Examples include IRATA-certified Rope Access Technicians

Thinking about worker competence now will give you a better understanding of the safety of the roof areas you manage. It will also help with contractor selection, ongoing risk assessments and work orders. And by keeping a record of this assessment, you can demonstrate that you've given adequate consideration to height safety provision in a reasonably practicable way, in line with your duties. Put simply, with a better understanding of competence, you can keep your people safe, fulfill duties and reduce the cost of any rooftop work you manage.

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OBLIGATIONS AS A FACILITY MANAGER

WORK AT HEIGHT HIERARCHY

Avoid Work at Height

As a facility or safety manager, your primary responsibility is to provide a safe working environment on behalf of your company. The key focus is the safety and wellbeing of the employees, however there is also certain responsibilities when it comes to contractors performing work on your facility.

First and foremost, wherever possible, work on a roof should be avoided. For a facility manager, this means minimizing the amount of equipment installed on the roof, and conducting work on the ground wherever possible. This eliminates all risk of falling from the roof and is therefore the most effective method of injury prevention.

If work at height cannot be avoided, then you must...

In the event of a fatality or workplace injury, it is likely that all parties involved will be scrutinized to determine fault. In many cases there is multiple parties held responsible. The most prominent pieces of legislation and guidance to be aware of that relate to general industry are:

Prevent Falls from Occurring

- OSHA 1910.22 - Walking-Working Surfaces - General Requirements
- OSHA 1910.23 - Walking-Working Surfaces - Ladders
- OSHA 1910.25 - Walking-Working Surfaces - Stairways
- OSHA 1910.28 - Walking-Working Surfaces - Duty to Have Fall Protection
- OSHA 1910.29 - Walking-Working Surfaces - Fall Protection Systems Criteria and Practices
- OSHA 1910.140 - Personal Fall Protection Systems
- OSHA 1926.1051 - Stairways & Ladders - General Requirements

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If work must be undertaken at height, then systems should be installed which prevent falls from occurring.

These measures should prevent falls from occurring. Collective systems include guardrails, toe boards, and safety nets. Personal fall protection equipment should only be used where it is not reasonably practicable to provide a collective alternative. Examples include anchor points and anchor line systems designed for work restraint.

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Personal protection systems, when used correctly with specific PPE, can usually only protect one or two workers at a time and require higher levels of competency.

You should read these regulations in full to be aware of your legal duties. But in summary, if a worker goes on your roof, your main responsibilities are to ensure that:

- Appropriate work equipment is provided and used
- This equipment is regularly inspected and properly maintained
- All risks have been identified and mitigated so far as reasonably practicable
- Each task conducted has been properly planned and organized
- All workers received the correct training, and are sufficiently knowledgeable and experienced to complete the task safely
- A roof access log is available and maintained

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Mitigate the Consequences of a Fall

As a last resort, if the risk of falling can't be removed, then the extent and consequences of any fall should be minimized with fall arrest systems. This reduces the risk of injury to workers, where fall prevention is not reasonably practicable. Fall arrest systems include measures such as anchors points or lifelines systems. Again, collective protection measures should be considered ahead of personal ones.

OSHA

RESPONSIBLE

CONSEQUENCES OF FAILURE

Courtesy of youngstromsafety.com



The consequences of failing to manage roof risk adequately are severe. Most importantly, they present a very real risk to people who could be injured or killed working on your roof. **There are also serious legal ramifications for facility managers, company directors and the business as a whole, even if no actual injury occurs.**

Russ Youngstrom was involved in a fall years ago. Visit his website to learn the challenges he faces. youngstromsafety.com

While most work at height is completed without incident, there are still thousands of injuries caused every year. Falls from height can result in long recovery periods, and those left unable to work can experience difficulties with mental health alongside the financial hardship caused by lack of income. These are entirely preventable with the correct policies and equipment in place.

887

887 total deaths in general industry were due to slips, trips and falls.

290,660

There was a total of 290,660 nonfatal occupational, fall-related injuries and illnesses involving days away from work.

With OSHA regularly publishing the names of companies facing convictions, and intense media scrutiny of these cases, a business can be financially affected by more than just the fines they receive. Potential customers are only a search away from finding out about any issue in your company's past Health and Safety record. A reputation is built over a lifetime, but can be lost overnight. It pays to keep on top of your responsibilities, and your record clean.

\$25M

More recently in March of 2019, a roofer was awarded a \$25 million verdict. A contractor fell through a skylight on the roof while he was performing work. In the result of his fall he has suffered a brain injury and numerous fractures as well as new struggles that face his family. He was only 40 years old. The company that held the property lease was found 60% negligent, the building owner 30% negligent and the contractor 10% negligent.

More recently in March of 2019, a roofer was awarded a 25 million verdict. A contractor fell through a skylight on the roof while he was performing work

16.9%

In 2015, 16.9% of all fatal falls were from heights of 10 feet or less.

\$129k

OSHA will issue a fine of \$129,000 per violation if it is willful or repeated.

#1

'Fall protection' was the #1 most cited violation by OSHA. 'Ladders' came in at #6 and 'Fall Protection-Training Requirements' was #8.