FALL PROTECTION PROGRAM OVERVIEW

November 18, 2013

1.0 Purpose and Applicability
The purpose of this Program is to ensure that University personnel and students who work at heights have the knowledge and tools to work safely. This program overview applies to elevated work surfaces at six feet or greater above the lower level, that can’t be accessed using a ladder, including but not limited to ramps, runways, other walkways, excavations, hoist areas, holes, leading edge work, unprotected side or edges, other walking/working surfaces. Protection must be provided for all workers, be they student or staff, and students who are exposed to potential hazards at heights.

2.0 Definitions
2.1 Work at heights is whenever students or employees will be 6 feet or more. Ladders that are less than 25 feet in height are not subject to this overview.

2.2 Passive restraint systems may include safety nets, guardrails, etc.

2.3 Personal fall arrest systems may consist of a full body harness, a deceleration device, a lanyard, and an anchor point. A personal fall arrest system should be constructed such that personnel can neither fall more than six feet nor contact a lower level or equipment or building components during the fall.

2.4 A personal fall restraint system may consist of a full body harness that is connected to an anchor point by a lanyard. It prevents the worker from reaching the edge of the elevated work surface.

2.5 ANSI is the American National Standards Institute.

3.0 Roles and Responsibilities
3.1 Environmental Health & Safety (EHS), along with department Safety Coordinators, has overall responsibility for the program administration including the training, evaluation, inspections, and audits. EHS conducts periodic audits of the workplace to ensure that this program is being effectively implemented. EHS has final authority over all safety issues and may halt operations or practices it considers as an imminent danger at any time at its discretion.

3.2 Each department is responsible for purchase and maintenance of the equipment, both structural and all components of personal arrest or restraint systems, and any passive fall protection components. Departments ensure that the manuals are made available to each user on specific personal fall protection equipment, and appoint an individual as a designated Department Safety Contact who will be the point of contact with the EHS Department and employees concerning fall protection safety issues.

Departments are responsible for providing and informing all users of any personal protection requirements (PPE) required when working at heights. Departments are responsible for resolving
any safety issues that arise, during inspections or audits. Departments may institute more stringent standards. When safety-related concerns have been discovered, the concern shall be corrected or the area shall be barricaded from access or equipment taken out of service until the hazards have been addressed. Departments and department contacts may employ qualified and competent third party contractors to assist with any components of this program provided that the contractor abides by the minimum requirements, as set by EHS for the University. Departments must comply with manufacturers’ specification for maintenance and use to ensure that equipment is kept in good working order.

3.3 Department Safety Contacts are responsible for enforcing all University policies and practices. They will model best practices and educate students and staff to promote a general culture of safety when working at heights. Department Safety Contacts are expected to halt work when unsafe operations or conditions are discovered. Department Safety Contacts must ensure that operators receive model specific training for all personal arrest/restraint systems.
- Understand hazards for their work surface and explains to all affected students, staff, and faculty
- Ensure modifications are not made to equipment without manufacturer’s prior approval
- Ensure signs, caution tape, barriers/fences and other means of diverting or safeguarding pedestrian traffic when there are workers at height above
- Ensure that employees and students attend and complete all general and site specific training
- Must retain completed inspections reports for a minimum of two years.

3.4 Employees and students are responsible for complying with all applicable rules and regulations, wearing all required PPE, and completing any University and department required training, including:
- Complete general fall protection training, offered by EHS, at a minimum of once every two years training prior to working at heights when passive systems are not in place
- Complete all department specific and hands-on training prior to working at heights when passive systems are not in place
- Inspect all equipment prior to use
- Always adhere to manufacturer specifications for the safe operation of all equipment
- Stop work immediately if they create a hazard for pedestrians or personnel working or walking below
- Notify their supervisor or Department Safety Contact immediately of any safety concerns, activation of personal arrest systems, or equipment damage
- Maintain any PPE required to work safely at heights.

4.0 Fall Safety Rules
- Fall protection must be employed or worn by all University personnel, students, staff, and faculty when there is a potential fall hazard of six feet or greater.
- Passive restraint systems such as guardrails may be employed provided they meet current standards.
- Inspect systems before each use for wear, damage, and other deterioration, and remove defective components from service.
- Remove systems and components from service immediately if they have been subjected to a fall impact, unless a qualified person has deemed them as undamaged.
- Use of personal fall protection is recommended but not required for ladders in good working order that are not taller than 25 feet in height.
- Ensure that personal fall arrest systems will, when stopping a fall, limit maximum arresting based on current industry standards.
• If a department believes that conventional fall protection methods are infeasible or may pose a greater hazard, they must contact EHS and provide a written plan to address these hazards.
• Use only ANSI approved equipment.
• Do not attach fall arrest systems to guardrail systems or hoists.

5.0 Program Elements
5.1 Inventory
Department Safety Coordinators and Department Safety Contacts will maintain an inventory of all personal protective equipment.

5.2 Inspections
Departmental Safety Contacts are responsible for performing self-inspections of personal safety equipment as recommended by the manufacturer in the time period as set by the manufacture or ANSI. Departments may employ qualified and competent third party contractors to assist with inspections. Each individual wearer of personal arrest/restraint system must perform an inspection of their personal protective equipment every time prior to use. Inspections must be documented and readily available for review. EHS may perform periodic inspections.

5.3 Training
EHS will offer general training on how to work safely at heights. This training is required at a minimum of every two years. Model and manufacturer specific training is also required and to be provided by the departments or an appropriate third party contractor. Model and manufacturer specific training is also required every two years. Departments may choose to adhere to more stringent training requirements.

5.4 Record Keeping
Departments shall maintain inspection reports and a current roster of employees and students who are trained.

5.5 Rescue Plan
Ensure adequate rescue plan is current and in place prior to working at heights. On the Main and PRC campuses this typically will involve the City of Austin’s emergency responders. Satellite locations may have to perform self-rescue. Rescue plans that do not involve City of Austin personnel must be reviewed, and when necessary, updated annually.

6.0 Program Review
EHS will conduct a program review and evaluation at least every two years and may make revisions and updates that will promote continuous improvement. For further details please consult EHS or your Safety Coordinator.

7.0 Key References and Resources
• President’s Environmental Health and Safety Statement of Commitment
• Occupational Safety and Health Administration (OSHA)
• Texas A&M University Environmental, Health, and Safety Department Fall Protection Program

Dr. Bob Harkins, Associate Vice President-Campus Safety and Security

Dr. Pat Cluett, Vice President-University Operations