Establishing a Written Ladder Safety and Inspection Program

The Occupational Safety and Health Administration (OSHA) frequently cites ladder violations for both General Industry and Construction. According to the <u>American Ladder Institute (ALI)</u>: "... work-related ladder falls result in one death and more than 180 nonfatal injuries every two days."

Various OSHA standards contain requirements for the design, selection, use, inspection, and employee training related to ladders. These requirements include:

29 CFR 1910.23, Ladders (General Industry)

Ensure the appropriate selection and use of ladders

- Inspect ladders before initial use in each work shift, and more frequently as necessary, to identify any visible defects that could cause employee injury
- Remove defective ladders from service and tag "Dangerous: Do Not Use" until repaired

29 CFR 1910.30, Training requirements

- Ensure a qualified person provides training to each employee who requires training under Subpart D
- Training must include the recognition of fall hazards and procedures to minimize hazards

29 CFR 1926.1053, Ladders (Construction)

- Ensure the appropriate selection and use of ladders
- Require inspection by a competent person for visible defects on a periodic basis and after any occurrence that could affect their safe use
- Remove defective ladders from service and tag
 "Do Not Use" until repaired

29 CFR 1926.1060, Stairways and Ladders, Training Requirements

Ensure a competent person provides training for each employee using ladders and stairways, to include hazard recognition and procedures to minimize hazards

Ladder manufacturers comply with ladder consensus standards developed by the ALI. The consensus standards describe general ladder requirements, specifications, testing, selection, care, use, and ladder labeling/marking.

This document identifies key elements to establish a written ladder safety and inspection program.

1. RESPONSIBILITIES

Define the responsibilities and procedures for all personnel within the organization involved with ladders, including:

- Safety staff develop and maintain a written ladder safety program to ensure correct selection, use, inspection, care, and maintenance of ladders per manufacturer requirements
- Supervisors ensure all ladders meet regulatory requirements, are properly inspected, maintained per manufacturer requirements, and employees have appropriate training
- Employees know how to choose and use the correct ladder for the job, when and how to inspect ladders, and how to report suspected unsafe conditions or ladders to their supervisor.



2. LADDER INSPECTION

Include guidance on conducting ladder inspections in your written program. Document the frequency and methods for inspecting ladders, procedures to follow when a ladder is found to be unsafe (e.g., tag out of service, repair, disposal), and how to obtain replacement labels from the manufacturer. Create a ladder safety inspection checklist using manufacturer information specific to your ladders. Example ladder inspection checklists may be found at:



Image courtesy of OSHA

- ALI Ladder Safety Resources
- Grainger Quick Tips #132.2
- > National Institute for Occupational Safety and Health (NIOSH) Ladder Safety Application
- Fixed Metal Ladders Inspection Checklist (Navy Fall Protection Guide, Appendix H)

When possible, form a team of employees familiar with your ladders and their safe use to help develop this section of your ladder inspection program.

3. EMPLOYEE TRAINING

Incorporate employee training requirements in your written program. Remember, all employees using ladders in your organization must receive training from a competent or qualified person. Ensure employees understand manufacturer requirements and instructions regarding safe use methods and limitations for each ladder they use. Retraining may be required if employees exhibit unsafe behavior or a lack of understanding regarding safe ladder use. Additional training resources include:

- OSHA Portable Ladder Safety Quick Card
- ALI's Ladder Safety Training
- NIOSH Ladder Safety Application

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Images courtesy of Bing Images (left) & CTC (right)

4. DOCUMENTATION

Document what to do with completed ladder inspection checklists – maintain hardcopies, scan checklist into a shared folder, or both. It is important both supervisors and employees can access them. Are the checklists submitted to the safety office, an employee in charge of the program, or other personnel?

Document ladder safety training. Training records require specific information, including: the date of training; the training session content; instructors' names and qualifications; student names, job titles, and attendee signatures. Verify online training gets recorded through a learning management system.

Your written ladder safety and inspection program is part of your overall safety and occupational health management system and is your organization's way of protecting personnel and preventing ladder incidents and injuries. Review your ladder inspection program as part of your annual self-evaluation, or more frequently if needed, and revise it as necessary.

For additional information on the SMCX's services, please visit the SMCX-hosted website: https://www.smscx.org/.

