SAFETY LEADERSHIP BEYOND THE POLICY

Leading Crews in a Multi-Generational Workforce

Presented By:
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Field Safety Consultant
SAFETY CHECK, INC.

WHY POLICY ALONE FALLS SHORT

- Written policies don't prevent injuries, decisions do
  - Policies do not control behavior
  - Decisions are made without supervision
  - Enforcement defines credibility

LEADERSHIP VS. AUTHORITY

- Consistency builds trust
- Inconsistency weakens compliance

Authority is positional. Leadership is behavioral.

MULTI-GENERATIONAL WORKFORCE REALITY

- Different ages, same goal.
- Different communication styles.
  - Expectations must remain consistent
  - Safety standards do not change by age

WHAT IMPROVES SAFETY ACROSS GENERATIONS

- Clarity, consistency, and context
  - Explain the "why"
  - Ask workers to explain their plan
  - Reinforce safe decisions consistently

SERVICE CREW LEADERSHIP REALITY

- Leadership becomes the primary control measure
  - Limited supervision
  - Rapidly changing conditions
  - Leadership replaces oversight

SERVICE CREW SCENARIOS

- Apply real-world applications to safety
  - Time pressure increases risk
  - Exposure exists regardless of duration of work
  - Leadership decisions are required, no matter how small the crew

CLOSING

- Policies guide. Leadership decides.
  - Policy sets expectations
  - Leadership drives execution
  - Safety culture is demonstrated, not written

Effective Safety Policies and Procedures for your Service Dept.

Presented By:
Frank J. Marino, CSP
Partner
SAFETY CHECK, INC.

What are the differences between a Production Project vs. Service Project..?


OXFORD

Today we will cover…..

- *Differences in the Fall Protection Program.*
- *How to Determine Fall Protection “Strategies”*
- *OSHA enforcement for Service Dept.*
- *Effectively monitoring and enforcement for Service Dept. employees.*

A Quick Review……

Conventional Fall Protection

- Guardrail Systems
- Covers
- Safety Net Systems
- Personal Fall Arrest Systems (PFAS)

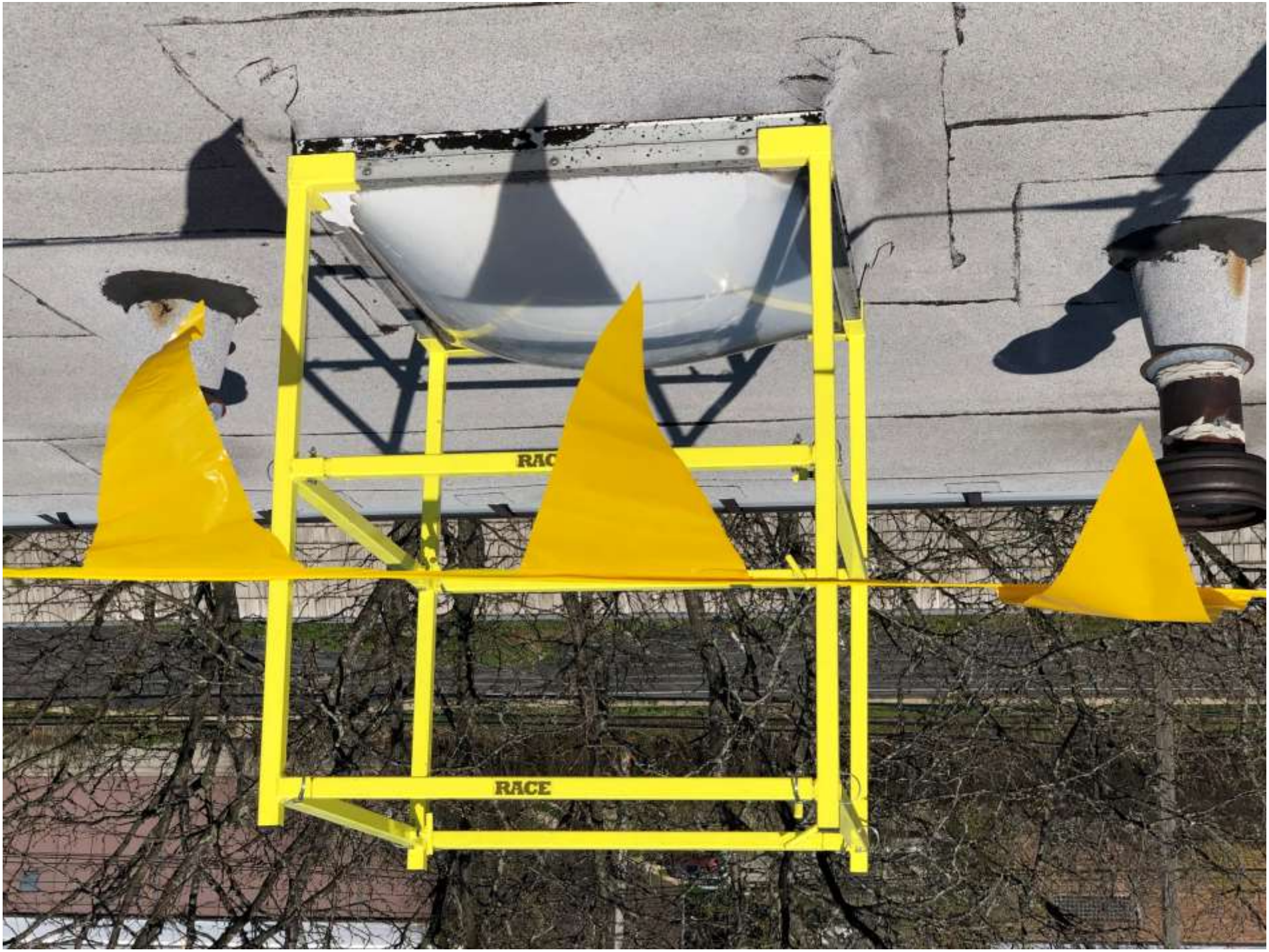
Alternative Fall Protection

Hoist Areas


SOPREMA
SOPREMA
SOPREMA
SOPREMA

Disposal Areas

Holes / Skylights


RACE

Wall Openings

Duty To Have Fall Protection

Conventional

- Hoist Areas
- Disposal Areas
- Holes / Skylights
- Steep-Slope Roofs
- Mechanical Equipment*
- Wall Openings

* Permitted within a warning line system

Alternative

- Roofing Work on Low-Sloped Roofs

OSHA 1926.500(a)(1)

This subpart sets forth requirements and criteria for fall protection in construction workplaces covered under 29 CFR part 1926.

Exception: The provisions of this subpart do not apply when employees are making an inspection, investigation, or assessment of workplace conditions prior to the actual start of construction work or after all construction work has been completed.

OSHA Field Operation Manual (FOM)

- **Employee Exposure**.
  A hazardous condition that violates an OSHA standard or the general duty clause shall be cited only ***when employee exposure can be documented.*** The exposure(s) must have occurred within the six months immediately preceding the issuance of the citation to serve as a basis for a violation, except where the employer has concealed the violative condition or misled OSHA, in which case the citation must be issued within six months from the date when OSHA learns, or should have known, of the condition. The RSOL should be consulted in such cases.

OSHA 1926.501(b)(13)

- *Residential construction*. Each employee engaged in residential construction activities 6 feet (1.8 m) or more above lower levels shall be protected by guardrail systems, safety net system, or personal fall arrest system unless another provision in paragraph (b) of this section provides for an alternative fall protection measure. ***Exception: When the employer can demonstrate that it is infeasible or creates a greater hazard to use these systems, the employer shall develop and implement a fall protection plan which meets the requirements of paragraph (k) of § 1926.502.***

Note: There is a presumption that it is feasible and will not create a greater hazard to implement at least one of the above-listed fall protection systems. Accordingly, the employer has the burden of establishing that it is appropriate to implement a fall protection plan which complies with § 1926.502(k) for a particular workplace situation, in lieu of implementing any of those systems.

Infeasible…?

The Alternative Creates a Greater Hazard

1926.502(k)

Fall protection plan. This option is available only to employees engaged in leading edge work, precast concrete erection work, or residential construction work (See § 1926.501(b)(2), (b)(12), and (b)(13)) who can demonstrate that it is infeasible or it creates a greater hazard to use conventional fall protection equipment. The fall protection plan must conform to the following provisions.

1926.502(k)(1)

- The fall protection plan shall be prepared by a qualified person and developed specifically for the site where the leading edge work, precast concrete work, or residential construction work is being performed and the plan must be maintained up to date.

1926.502(k)(2)

- Any changes to the fall protection plan shall be approved by a qualified person.

1926.502(k)(3)

- A copy of the fall protection plan with all approved changes shall be maintained at the job site.

1926.502(k) Cont.

1926.502(k)(4)

- The implementation of the fall protection plan shall be under the supervision of a competent person.

1926.502(k)(5)

- The fall protection plan shall document the reasons why the use of conventional fall protection systems (guardrail systems, personal fall arrest systems, or safety nets systems) are infeasible or why their use would create a greater hazard.

1926.502(k)(6)

- The fall protection plan shall include a written discussion of other measures that will be taken to reduce or eliminate the fall hazard for workers who cannot be provided with protection from the conventional fall protection systems. For example, the employer shall discuss the extent to which scaffolds, ladders, or vehicle mounted work platforms can be used to provide a safer working surface and thereby reduce the hazard of falling.

1926.502(k) Cont.

1926.502(k)(7)

- The fall protection plan shall identify each location where conventional fall protection methods cannot be used. These locations shall then be classified as controlled access zones and the employer must comply with the criteria in paragraph (g) of this section.

1926.502(k)(8)

- ***Where no other alternative measure has been implemented, the employer shall implement a safety monitoring system in conformance with § 1926.502(h).***

1926.502(k)(9)

- The fall protection plan must include a statement which provides the name or other method of identification for each employee who is designated to work in controlled access zones. No other employees may enter controlled access zones.

1926.502(k)(10)

- In the event an employee falls, or some other related, serious incident occurs, (e.g., a near miss) the employer shall investigate the circumstances of the fall or other incident to determine if the fall protection plan needs to be changed (e.g. new practices, procedures, or training) and shall implement those changes to prevent similar types of falls or incidents.

Ask Yourself…

…Is it Safe ???

Steps to Determine Fall Protection Plan on a Service Project:

- *Perform Roof Top Inspection*
- *Determine Hazard Exposure*
- *Develop Fall Protection Plan (which includes a feasibility assessment)*
- *Perform the work*

SAFETY CHECK, INC.

CONTRACTOR XYZ
JOB HAZARD ANALYSIS

The following Job Hazard Analysis is for the installation of a roof system at the locations detailed below and is intended to be supplemental to, and used in combination with, the COMPANY XYZ. Safety & Health Manual, and any applicable Local, State, and/or Federal Regulations

PROJECT NAME: 233 E. Wacker Dr. Chicago IL 60601	**DATE:** 5/14/25
ADDRESS: 233 E. Wacker Dr. Chicago IL 60601	
SURVEY PERFORMED BY: Frank J. Marino, CSP	

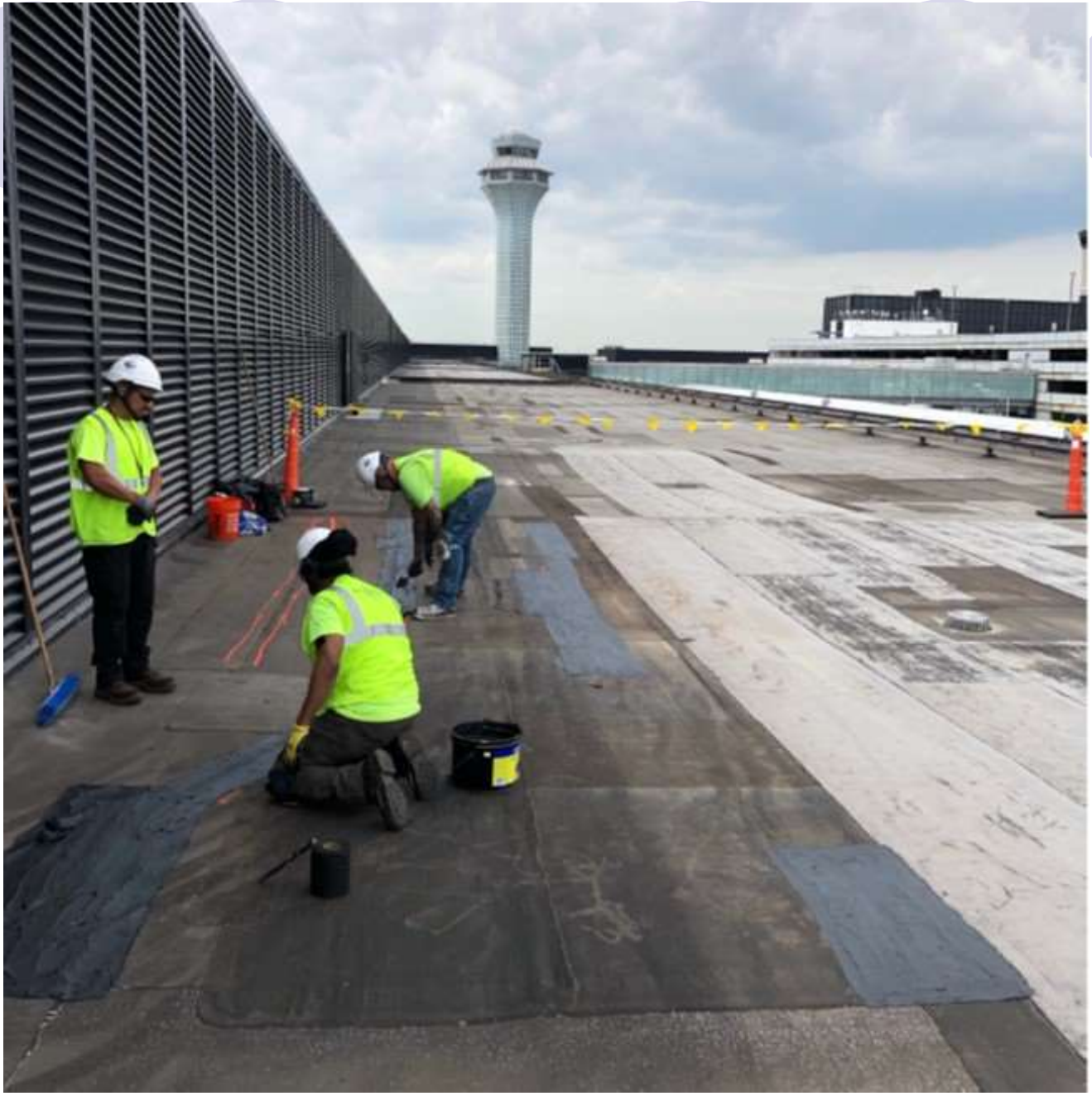
WORK TO BE PERFORMED	POTENTIAL HAZARD	RECOMMENDED ACTION
• Access to the roof /different roof sections • Access via an extension ladder (Continued from previous section)	• Employees could fall while accessing the roof sections • Access / Egress could become blocked • Employees may be exposed to overhead hazards • Employees may fall through the roof hatch • The ladder may fall (Continued from previous section)	• Ladders, steps, or ramps will be provided for any break in elevation on the walking/working surface greater than 19 inches. • Ladders will be inspected prior to use and will be tagged / removed from service if damaged • Ladders will be set up & utilized in accordance with 29 CFR 1926.1053 • Employees will maintain three points of contact on ladders; objects will not be carried • Ladders will be secured & extended at least 3 feet • No materials will be stored in areas that may block any access / egress • Employees will wear hardhats when overhead hazards are present • The area will be inspected for power lines; ladders will not be set up or utilized in any area where an employee, the ladder, or any other tools being carried could make contact with a power line

Fall Protection Evaluation:

Perimeter

Hoisting

Holes



What NOT To Do…..

- *“One Size Fits All…”*
- *Answer a Question with a Question.*
- *Impede lines of communication that are vital for problem solving.*
- *…And NEVER Forget to ask “Is it Safe..?”*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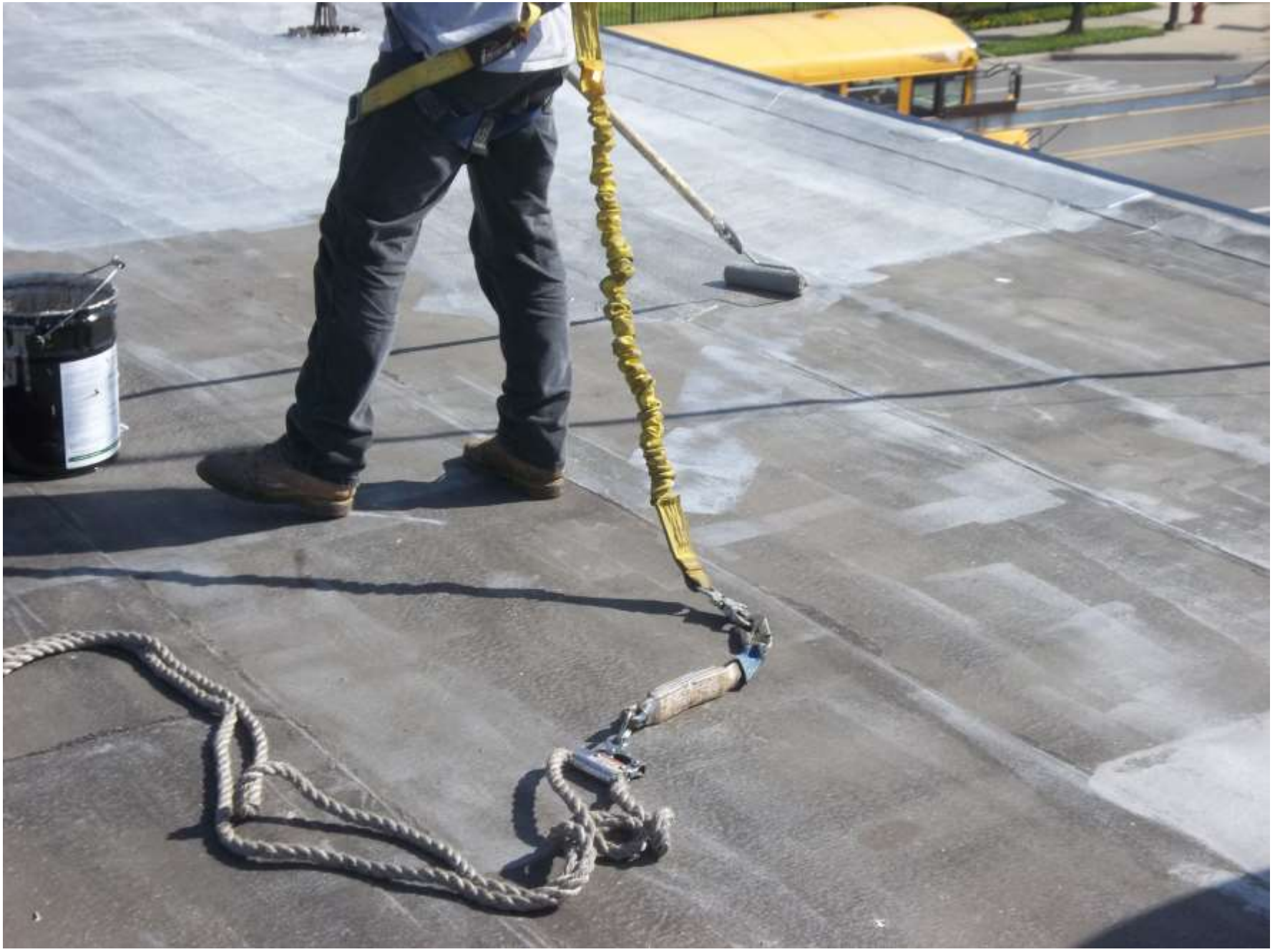

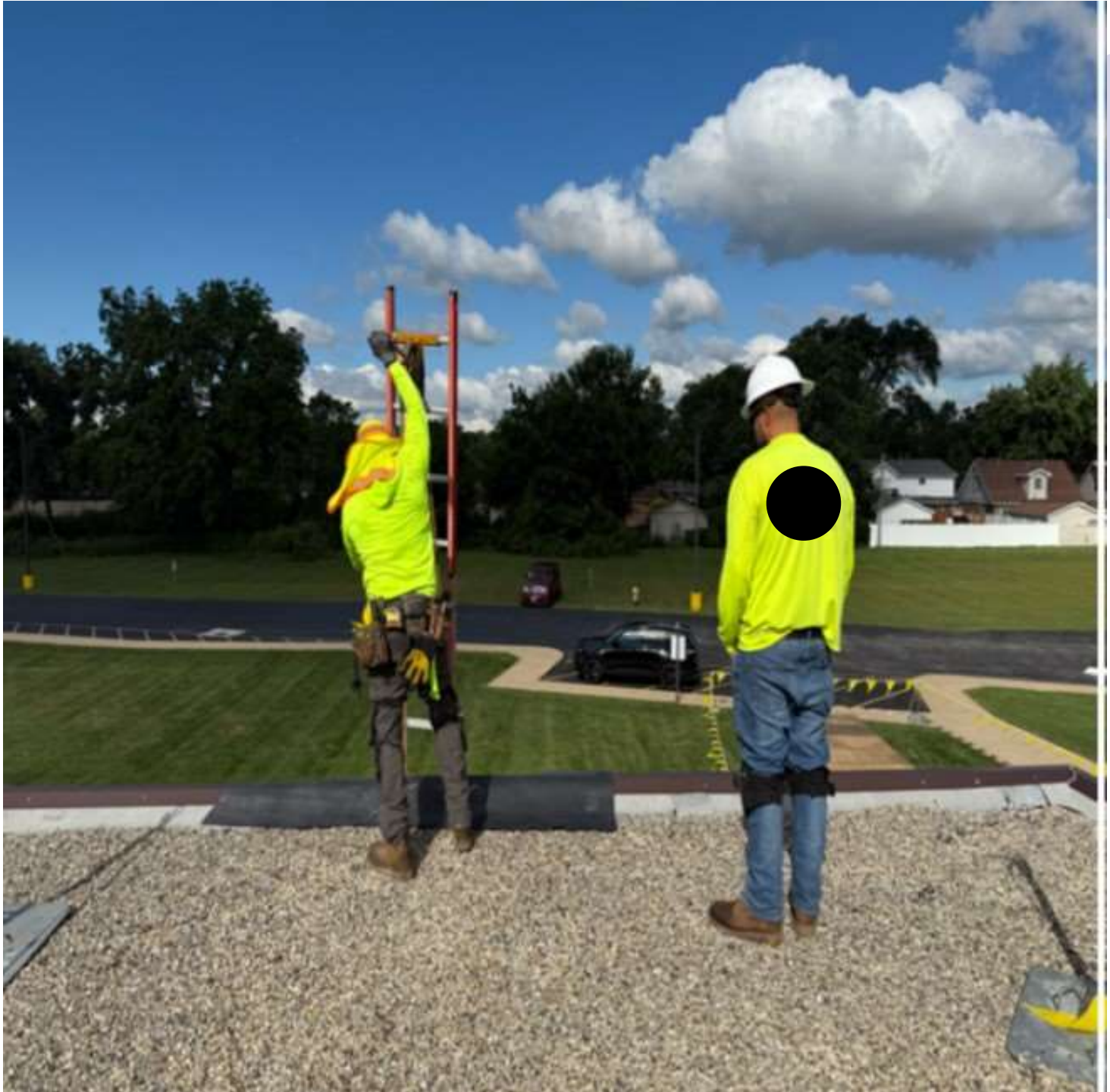


JLG

Tools to ensure compliance on Service projects:

- *Frequent and Regular Inspections.*
  - *i.e. photos submitted by foreman*
- *Engage in "Explain your Process" conversations with the Competent Person.*
- *Use specific scenarios in ongoing training sessions*