DROPPED OBJECTS POLICY

{COMPANY NAME}

{REPLACE ERGODYNE LOGO w/ COMPANY LOGO}

The following Dropped Objects Sample Policy is only intended to provide an example of a written policy on the topic of dropped-objects prevention. Employers may use this sample policy as general guidance when developing their own customized policy that is tailored to their respective workplace and their individual needs. The Sample Policy is not intended to supersede any applicable OSHA or ISEA standards. Employers should consult the applicable OSHA or other workplace safety and health standards for specific requirements applicable to their workplace. ***The information provided in this Sample Policy is not legal or professional advice.*** *Accordingly, Ergodyne encourages you to seek appropriate independent, legal and professional advice before adopting a Dropped Objects Policy. Under no circumstances shall Ergodyne have any liability to you for any loss or damage incurred as a result of your use of this Sample Policy or your reliance on any information contained herein. Ergodyne makes no representation or warranty of any kind, express or implied, regarding the accuracy, validity, or completeness of any information contained in the Sample Policy.*

1. Introduction

1.1 Purpose

The purpose of this policy is to establish safe management practices for objects at heights, including safe practices for dropped/falling tools and objects that may cause injury or damage. Dropped object hazards should be considered when personnel are working in an area located above ground level, adjacent to or elevated relative to other personnel, sensitive equipment, or third parties.

1.2 Affected Personnel

This policy applies to **{company}** personnel and extends to third parties engaged in or impacted by work as described above.

1.3 Applicable standards

{Your organization may choose to omit some of the standard references if they do not apply to your industry or areas of work}

1.3.1 United States: Federal OSHA

- Scaffolds, 1926.451(h) – "falling object protection"
- Fall Protection, 1926.501(c) – "protection from falling objects"
- Steel Erection, 1926.759(a) – "securing loose items aloft"
- Walking Working Surfaces
  - 1910.23 – climbing with equipment safely
  - 1910.28 – "protection for employees exposed to fall and falling object hazards."

1.3.2 Canada: Occupational Safety and Health Regulations

1.3.3 United Kingdom: HSE Work at Height Regulation

- Falling Objects (10) – Every employer shall take steps to prevent the fall of any materials or object

1.3.4 Australia: Model Workplace Health and Safety (WHS) (Division 10)

- Management of risk of falling objects
- Minimizing risk associated with falling objects

1.3.5 Brazil: Ministry of Labor and Employment

- "using tools with mooring to prevent their accidental fall"

1.3.6 American National Standards Institute (ANSI)/International Safety Equipment Association (ISEA)

- ANSI/ISEA 121-2018
- American National Standard for Dropped Object Prevention Solutions

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2. Scope

2.1 Potential Dropped Objects

This policy applies to tools, equipment, and other objects that can be potential "dropped objects." Dropped objects include hand tools, instrumentation, small parts, structural components and other items that must be transferred and used at heights. These objects have the opportunity of becoming dropped objects potentially resulting in struck-by injury or fatality or damage to equipment. This policy addresses safety practices to mitigate dropped objects hazards with an emphasis on preventative practices.

2.2 When and Where to Practice Dropped Objects Mitigation

With the above considerations in mind established parameters will be set for when and where workers should put dropped objects controls into place.

- When working **{6ft/1.8m}** above ground level and **{10ft/2m}** from a leading edge or otherwise elevated relative to other personnel or sensitive equipment (refer to Section 7 for more detail).
- **{adjust parameters of where and when personnel should implement these practices based on your organization's policy}**

2.3 Potential Affected Persons and Objects

Dropped objects should be considered when they could injure or damage …

- A person
- The dropped object itself
- An object below
- The environment or work area below
- The structure being worked on
- Equipment from foreign objects
- **{insert other potential affected persons or objects identified by your organization}**

2.4 Causes of Dropped Objects

Personnel covered by this policy should be aware of potential causes of dropped objects in their work area. Dropped objects can result from a variety of conditions including:

- Environmental elements
- Worker-generated conditions
- Poor housekeeping conditions
- Improper equipment transportation to and from heights
- **{insert other causes identified by your organization}**

2.5 Other considerations

Other organizational policies referenced with relation to dropped objects.

- Housekeeping
- Walking-Working Surfaces
- Fall Protection
- Material Handling
- Personnel training
- **{insert other policies here}**

2.6 Definitions

{Your organization may choose to define key terms as they relate to dropped objects and their control}

3. Responsibilities

{Add, remove or arrange responsibilities below as necessary}

3.1 Management and Supervisors

- Develop and maintain the Dropped Object Prevention Policy that establishes safe management practices, engineering controls, and other preventative and protective actions as well as specify when and where these actions should or shall take place.
- Designate a Competent Person.
- Conduct or coordinate Hazard Analysis for upcoming projects.
- Provide appropriate equipment and materials related to preventative and protective actions and tools.
- Maintain inventory of dropped object prevention solutions and materials.
- Ensure personnel receive training on the dropped object preventative and protective actions and other tools used in the workplace.
- Communicate responsibilities under this policy to affected third parties so they are aware of and understand their responsibilities through pre-construction meetings, pre-task planning, safety meetings, and other coordination activities.

3.2 Competent Person

- Assist management personnel with maintenance and implementation of the Dropped Object Prevention Policy.
- Conduct or coordinate Hazard Analysis for upcoming projects and communicate findings.
- Conduct personnel training related to dropped object preventative actions and solutions used in the workplace.
- Ensure dropped object prevention solutions are maintained and regularly inspected by appropriate personnel.
- Conduct regular inspections of the worksite for dropped object hazards and effectiveness of implemented controls.
- Stop work if hazardous conditions prevent the job from being done safely.
- Conduct necessary inspections or evaluations prior to resuming work after a stoppage due to hazardous conditions.

3.3 Authorized Installers and Inspectors

- Identify tool geometry, weight, and other characteristics of tools used at height to select proper dropped object prevention solutions.
- Install engineering controls as applicable to prevent objects and tools from being dropped from elevated work areas.
- Apply dropped object prevention solutions to applicable tools used at heights.
- Conduct inspections at **{designated frequencies}** to identify dropped object prevention solutions that need to be replaced or repaired.
- Stop work if hazardous conditions prevent the job from being done safely.

3.4 Authorized Users

- Notify supervisor or manager of dropped object hazards in the workplace.
- Participate in elimination and mitigation of dropped object hazards prior to the start of work.
- Use preventative and protective controls as directed by management and supervisors.
- Attend and participate in training administered by the organization or designated third-party training provider(s).
- Stop work if hazardous conditions prevent the job from being done safely.
- Immediately report dropped or fallen tools, materials, or equipment.
- Participate in Job Hazard Analysis, Dropped Object Hazard Evaluation, and other pre-construction and pre-task planning and training activities.

4. Hazard Analysis, Risk Assessment, and Task Planning

4.1 A "Dropped Objects Hazard Analysis and Work Plan (*Appendix A*)" will be conducted to evaluate operations and identify the potential for dropped items while conducting elevated work and methods of control. This evaluation should take place during the development of the Job Hazard Analysis, Site-Specific Safety Plan, or other project-specific plan. Work should not start until mitigation actions are taken, and tools are in place.

4.2 After identifying the actual and potential hazards, and exposures present at the worksite, assess the risks to identify if the hazards can be eliminated or substituted prior to evaluating the use of engineering and other controls. Refer to Section 6 of this program for detailed information on the hierarchy of controls.

5. Inspection of the Worksite

5.1 Frequency
Throughout a project, as the workplace is evaluated, the effectiveness of procedures included in this policy should be audited through informal daily walks and formal inspections done at specified frequencies by designated personnel.

{Insert organization's policy here regarding inspection frequency, additional inspection details, and requirements}

5.2 Documentation
Formal inspections of the worksite should be documented and include evaluation of dropped objects hazards, dropped objects prevention solutions, and other controls related to dropped objects hazards.

{Insert organization's policy here regarding documentation of inspection or refer to other policies}

6. Hierarchy of Controls

Controls are listed in order of ideal application. When a hazard is identified, consider how to eliminate or substitute that hazard before implementing a combination of Engineering, Administrative, and/or PPE controls.

6.1 Eliminate the Hazard: Determine if the risk or exposure of elevated work or tools and materials can be eliminated.

6.2 Substitute the Hazard: Determine if the elevated work can be done in a different way so tools and materials are not used at height.

6.3 Engineering Controls

Engineering Controls isolate people from the hazard and are considered Preventative Practices. They are broken into two categories: Passive and Active Controls. Jobsites and specific applications within the worksite should be evaluated for the ability to implement both Passive and Active controls.

6.3.1 Passive Controls do not require active participation from the worker. Jobsites should be evaluated prior to and during work to determine if Passive Controls can be put into place to prevent dropped objects. Depending on the equipment in use, possible solutions to consider include:

- Grating
- Toe boards
- Tie-downs
- Netting
- Guarding
- Barricading
- Other passive means of preventing tools, equipment, and materials from falling to a lower level.
- **{Delete controls that do not apply to your organization's work, add controls as necessary}**

6.3.2 Active Controls require active participation from the workers. These include tethering systems and containers that secure tools and equipment when at heights. The Three T's of Active Dropped Object Controls should be implemented. These fall into two practices Tethering Systems and Containment:

- **Tethering Systems**
  - **Trapped:** Captures an attachment point on anchors and tools that do not have one built in. Most anchors and tools lack convenient connection points so certified retrofit attachment points should be applied. **{you may choose to list the Trapped controls used by your organization here. Refer to these Anchor & Tool Attachments as examples.}**

- **Tethered:** Prevents objects from falling by securing them to a worker or other anchor point. The weight of the item being tethered must be considered as well as the type of connection needed for the tool, and the length of lanyard needed. Tools and other items like communication equipment and PPE should be tethered.
  {you may choose to list the Tethered controls used by your organization here. Refer to these Tool Tethers/Lanyards as examples.}

- **Containment**
  - **Topped:** Buckets, pouches, and other containers should be securely covered to avoid spilling their contents. The type of equipment being transported as well as the weight of equipment must be considered when choosing a solution for carrying or hoisting.
    {you may choose to list the Topped controls used by your organization here. Refer to these Tool Pouches and Hoist Buckets as examples.}

6.3.3 All active controls used (Trapped, Tethered, and Topped) should be labeled and marked to indicate they have been tested by the manufacturer per **ANSI/ISEA 121-2018**. This standard includes requirements for:

- Design of the solutions
- Performance of the solutions
- Testing and labeling of solutions

6.4 Administrative Controls

Administrative Controls involve changing the behavior of individuals on the worksite. These controls can be broken into several categories:

- Zoning or Perimeter Setting
- Awareness and Communication Materials
- Policies and Procedures
- Pre-Task Planning
- Housekeeping
- Staging and storage of tools, materials, and equipment
- Material handling
- Positive control of tools
- Equipment inspection

6.5 Personal Protective Equipment

PPE is a secondary dropped object prevention solution that minimizes worker injury due to dropped objects and should be used in combination with other controls. Wear PPE that protects and covers the worker or deflects an object after it has fallen.

Examples of PPE include:

- Hard hats
- Safety eyewear
- Safety-toed boots
- **{include other PPE examples here based on your organization's operations, i.e.: gloves with dorsal protection}**

7. Tools, Materials, and Equipment at Heights

7.1 Tool Inventory Log

Tools to be used at height will be documented using a Tool Inventory Log (*Appendix C).* The log will include information used to select the appropriate dropped object prevention solutions:

- Photo of tool **{optional}**
- Tool assignment **{person, task, site}**
- Tool Geometry & Weight
- Trapping and Tethering solutions information
- Sign-In and Sign-Out **{if required}**

7.2 Manufacturers Information

Refer to manufacturer-supplied instructional information when using tools and installing dropped object prevention solutions.

7.3 General best practices for tools and their use at heights are as follows:

7.3.1 Selection of Tools Used at Heights

- Select tools with inherent captive connection points whenever possible.
- Tools with multiple parts should have systems to prevent separation of the parts, i.e., sockets should lock into wrenches.
- Select hammers and other striking tools that have steel or composite shafts with a head-locking mechanism.
- Select tools with non-slip handles whenever possible.
- Non-slip grips should be securely fastened to the handle or inherent to the handle to avoid slipping off the end of the tool.

7.3.2 Where and When to Practice Prevention (Passive & Active Controls)

- Tethering systems and equipment containment/securement should be in place when workers ascend **{6ft/1.8m}** up and are less than **{10ft/3m}** away from a leading edge or other exposed opening to lower levels.
- Tethering systems and equipment containment/securement should be in place when otherwise elevated relative to personnel or sensitive objects.

- Tethering systems and equipment containment/securement should be in place in specified FOD (Foreign Object Disposal) or FME (Foreign Material Exclusion) zones.
- **{Set predetermined height and distance from an edge and other parameters for when tethering and securement should be in place}**

7.4 General weight capacity guidelines for anchoring tools and tool containers:

- If tool <5lbs // 4.5kg = Can be anchored to the body (tool belt or fall protection harness) if desired.
- If tool >5lbs // 4.5kg = Anchor to a rated structure.
- Best practice is to anchor to a separate tool or structure whenever possible.

7.5 General weight capacity guidelines for tool containers worn by workers:

- When transitioning equipment to heights it should be secured in a pouch or other container that allows the worker to climb safely.
- Workers should not carry more than **{40lbs/18kg}** on their person when climbing.
- Other equipment should be hoisted to heights in a rated portable container.
- **{set a maximum load that workers can carry on their person}**

8. Inspection of Dropped Object Prevention Solutions

8.1 Frequency of Inspection

Dropped object prevention solutions are required to be inspected **{insert inspection interval requirement here. Intervals should be determined according to frequency of equipment use. Refer to company policy or manufacturer-supplied instructions for guidance on inspection intervals.}**

8.2 General Guidelines for Inspection

In general, the following guidelines should be followed for inspection of dropped object prevention equipment (Trapping - Anchor & Tool Attachments, Tethering - Tethers/Lanyards and Topping - Containers):

- Daily: The end user should visually inspect the solutions before and after each use.
- Monthly: The Competent Person should conduct monthly inspections of the solutions. This inspection should be documented.

9. Replacement of Dropped Object Prevention Solutions

9.1 Dropped object prevention solutions should be replaced if:

- It fails a regular inspection.
- It has been involved in a drop.
- It exceeds the replacement frequency as detailed below in Section 9.3.

9.2 If there is a question about any solution, it should be removed from service until a Competent Person can inspect it. The Competent Person should determine if the equipment should be returned to service or replaced.

9.3 Frequency of Replacement

{Insert organization-specific replacement guidelines if applicable or use the following information}

Dropped object prevention solutions should be replaced per manufacturer guidelines provided with the manufacturer's instructions. In lieu of manufacturer's instructions, the following guidelines should be followed:

- Every 6 months if under heavy use or exposed to unusual conditions
    - Heavy Use = the equipment is used daily or every other day.
    - Unusual Conditions Examples = extreme temperatures, environmental factors, chemical exposure
- Every 12 months if under light use
    - Light Use = the equipment is used weekly or less frequently.

9.4 Employee-owned tools and tethering equipment are the **{employer's}** responsibility once used at the worksite and are subject to rules contained within this Policy.

10. Care and Maintenance of Dropped Object Prevention Solutions

10.1 Maintenance and Cleaning

In addition to daily inspection by the end user and monthly inspection by a Competent Person, dropped object prevention solutions should be properly maintained and cleaned per the manufacturer's guidelines.

{insert any specific requirements here}

10.2 Storage of Dropped Object Prevention Solutions

- Solutions should be stored out of direct sunlight or other elements.
- Solutions should be stored in an area where it will not be snagged, spilled on, or otherwise damaged.
- A tool lanyard or other dropped object prevention solution may be stored while attached to a tool.

{insert any specific requirements here}

11. Personnel Training

11.1 Initial Training
Personnel must receive training appropriate to their responsibilities under the Dropped Object Prevention Solutions Policy and any site-specific safety plan prior to exposure to objects at heights. At a minimum this training should include:

- Potential dropped object hazards in their workplace.
- Procedures and equipment used for dropped object hazard prevention.
- Use and limitations of dropped object prevention solutions.
- Inspection, storage, and maintenance procedures for dropped object prevention solutions.
- Reporting procedures for incidents and near misses.
- **{insert any specific training timelines or details here}**

11.2 Retraining should be conducted in the following instances:

- At least once every **{two}** years.
- When a new hazard is identified in the workplace.
- When new dropped object prevention solutions are put into service at the workplace.
- When there are changes to the Dropped Object Prevention Policy.
- When there is reason to believe that the employee needs remedial training.

11.3 Specialized Training
Depending on specific personnel responsibilities, training may include detailed information on installation and inspection of dropped object prevention solutions.
{insert any specialized training details here}

11.4 The basic levels of dropped object hazards training is as follows:

- General Awareness: Students understand dropped objects fundamentals.
- Equipment Use & Inspection: Students understand how to select, use, and inspect dropped object prevention solutions.
- Tool Management & Installation: Students understand how to inspect and install dropped object prevention solutions.
- Competent Person: Students understand how to identify dropped object hazards and solutions.
- Program Administrator & Trainer: Students understand how to build and implement dropped object prevention policies.

11. Policy Review

This policy should be reviewed annually and when new tasks, equipment, or dropped object prevention solutions are added to the workplace or new jobs are started.

12. Policy Resources

Ergodyne: www.ergodyne.com

- Dropped object prevention solutions and products
- Installation tutorial videos
- Safety training and information

The ANSI/ISEA 121-2018 standard:
https://safetyequipment.org/product/ansi-isea-121-2018/

The ISEA Dropped Objects Prevention Solutions resources page:
https://safetyequipment.org/dropped-object-prevention-resources/

Dropped Object Prevention Scheme (DROPS): www.dropsonline.org/resources-and-guidance

{Insert other dropped object prevention solutions manufacturer information here for products used at the worksite}

Appendices

Appendix A: Dropped Objects Hazard Analysis and Work Plan

Appendix B: Dropped Object Prevention Solution Tool Inventory

Appendix C: Ergodyne Dropped Object Prevention Solutions Inspection Log

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