

Body & Limb Protection & PPE Policy



From loading docks to lawyers' office, your workers face risk of injury to the arms, legs and torso. However, most of the injuries that do happen could have been prevented. The good news is that most of these injuries can be prevented with proper safety policies, procedures and equipment. Here's a policy template you can adapt to ensure safe and compliant selection, use, maintenance and inspection of body, arm and leg protection and other PPE required by OHS laws.

1. PURPOSE

ABC Company has adopted this Policy to ensure that all personnel required to use have and properly use, maintain, inspect and store safety and personal protective equipment ("PPE") that's adequate to protect their torso and limbs from the hazards they face while performing their work, whether at a Company workplace or offsite location, in accordance with [province] *Occupational Health and Safety Regulations* ("OHS Regulations"), the *Occupational Health and Safety Act* ("Act"), the ABC Company Occupational Health and Safety Program ("OHS Program"), and other applicable requirements and standards.

2. DEFINITIONS

For purposes of this Policy:

- **"Administrative controls"** means the provision, use, and scheduling of work activities and resources in the

workplace, including planning, organizing, staffing, and coordinating, for the purpose of controlling risk;

- **“Body and limb hazards”** includes risks or conditions that may result in injury to a worker’s body, torso, arms, legs, hands or skin, including but not limited to punctures, cuts, irritations, burns, abrasions, fractures, amputations, contamination, infection, contact with a hazardous, chemical or biological substance, exposed energized electrical conductor or extremely cold or hot surface, exposure to work processes that result in extreme temperatures, injury caused by prolonged exposure to water and hand arm vibration;
- **“Engineering controls”** means the physical arrangement, design, or alteration of workstations, equipment, materials, production facilities, or other aspects of the physical work environment, for the purpose of controlling risk;
- **“New worker”** includes any worker who is:
 - New to the workplace;
 - Returning to a workplace where the hazards in that workplace have changed during the worker’s absence;
 - Affected by a change in the hazards of a workplace; or
 - Relocated to a new workplace if the hazards in that workplace are different from the hazards in the worker’s previous workplace;
- **“Practicable”** means that which is reasonably capable of being done, a standard applied in determining what safety measures to implement to control a hazard;
- **“Qualified”** means being knowledgeable of the work, the hazards involved, and the means to control them by reason of education, training, and/or experience;
- **“Young worker”** means a worker under age 25.

3. POLICY STATEMENT

ABC Company's approach to managing workplace hazards, including body and limb hazards, is to totally eliminate them. However, total elimination of such hazards may not be practicable in all situations. When total elimination is not practicable, ABC Company will take steps to minimize and control body and limb hazards, which may include the use of engineering controls, administrative controls, safe work practices, and PPE, or a combination of the above.

In selecting controls, ABC Company will give preference to measures that control the hazard at the source; second choice will be accorded to measures that control the hazard along its path to the worker; PPE and other measures that control the hazard at the worker will be used as a measure of last resort and/or as a means of supplementing and backing up controls implemented at the source and along the path.

Where PPE is determined to be necessary to deal with body and limb hazards, workers affected by the hazard requiring use of PPE must understand what the PPE does to protect them, what its limitations are, and how to properly use, inspect, and maintain it before engaging in operations requiring them to use the PPE.

4. SCOPE OF POLICY

The intent of this Policy is to ensure that **all workers** engaged to perform work for ABC Company at its work sites who may be exposed to body and limb hazards have and are required to properly use, inspect, and maintain the required protective clothing or equipment regardless of who supplies that clothing or equipment or who employs those workers, including:

- Full- and part-time workers paid by ABC Company;
- Temporary employees placed by an outside agency to work at the site;
- Contract labourers engaged to perform work at the site;

- Volunteers who work at the site for free; and
- Workers employed by prime contractors, contractors, and subcontractors to perform work at the site under a contract with ABC Company.

5. WORKER RESPONSIBILITY TO PROVIDE GENERAL PURPOSE WORK GLOVES & SAFETY BOOTS

Workers must provide and use general purpose work gloves to protect their hands and general purpose boots or safety footwear to protect their feet while performing their jobs. ABC Company will furnish the other forms of body, hand, arm, leg and skin protection required by OHS Regulations and this Policy for workers' use.

6. OTHER ROLES & RESPONSIBILITIES

6.1. ABC Company

Owners, corporate officers and directors, upper management, and other individuals at ABC Company who may be considered an "employer" under the Act are responsible for oversight and general implementation of this Policy, including ensuring that:

- Hazard assessments are carried out to identify body and limb hazards and determine what measures are necessary to control them, including which PPE is required for particular operations, work areas, equipment or conditions;
- Such PPE assessments are carried out in consultation with the:
 - Workplace Joint Safety and Health Committee (JHSC) or Health and Safety Representative (Safety Rep); and
 - Workers who will use the PPE;
- Where it is required, appropriate PPE that meets or exceeds the standards set out in the OHS Regulations is used;

- If practicable, alternative PPE or safety measures are provided to workers when the required PPE causes them allergenic or other harmful health effects;
- Safe work procedures are developed for operations in which the use of PPE is required, and workers are instructed in those procedures before being required to carry them out;
- Workers required to use PPE are adequately instructed in its correct use, limitations, and maintenance; and
- This Policy is appropriately reviewed.

6.2. Safety Coordinator

The ABC Company safety coordinator, facility manager, or other individual in charge of safety at the workplace is **responsible for ensuring the measures required by this Policy are effectively carried out, including:**

- Hazard assessments to identify body and limb hazards and determine necessary measures are to control them, including which PPE is required for particular operations, work areas, equipment, or conditions;
- Hazard assessment consultations with the:
 - JHSC or Safety Rep; and
 - Workers who will use the PPE;
- Selection of appropriate PPE that meets or exceeds the standards set out in the OHS Regulations;
- Provision of all workers with the PPE they are required to use—whether such PPE is provided by ABC Company or workers themselves;
- Inspection of PPE and removal of defective PPE from service;
- Development of safe work procedures for operations in which the use of PPE is required and instruction of workers in such procedures before workers are required to carry them out;
- Instruction of workers required to use PPE in the PPE's correct use, limitations and maintenance **before** it's

used;

- Application of this Policy to prime contractors, contractors, subcontractors and visitors; and
- Review of this Policy.

6.3. Supervisors

Supervisors are responsible for ensuring that appropriate PPE is:

- Available to workers;
- Properly worn when required; and
- Properly cleaned, inspected, maintained, and stored;

Supervisors must also be prepared to carry out or oversee the safety measures required by this PPE Policy, including:

- PPE-related hazard assessment;
- Selection of appropriate PPE to control identified hazards;
- Development of safe work procedures for job tasks and operations that require use of PPE;
- Training and instructing workers in the above safe work procedures before workers are required to implement them;
- Instructing workers in the proper use, limitations, care, maintenance, and storage of the PPE workers are required to use and ensuring workers actually follow those instructions;
- Showing workers how to ensure different items of PPE fit properly;
- Enforcing this Policy and applicable safe work procedures including, where necessary, via discipline;
- Ensuring that prime contractors, contractors, subcontractors, and visitors are notified of and required to comply with this Policy (and any applicable safe work procedures); and

- Reviewing this Policy.

6.4. Workers

Workers are responsible for knowing and carrying out their obligations under this Policy, including:

- Providing their own:
 - Clothing to protect them from natural elements;
 - General purpose work gloves; and
 - Footwear, including safety footwear.

Workers required to use PPE are also responsible for:

- Using the PPE in accordance with their training and instruction;
- Inspecting the PPE before each use;
- Refraining from wearing PPE outside of the work area (to the extent wearing it would create a hazard);
- Report any PPE malfunction to their supervisor or manager.

Workers assigned responsibility for cleaning, maintaining, or storing PPE must do so in accordance with the training and instruction provided.

6.5. JHSC/Safety Representative

The JHSC or Safety Rep for the workplace, if any, is responsible for participating and consulting in, including but not limited to by issuing recommendations, the safety measures required by this Policy, including:

- PPE-related hazard assessment;
- Development and review of PPE-related safe work procedures;
- Selection of appropriate PPE;
- Inspection of PPE including ensuring that the required monthly workplace inspection addresses whether the required PPE is being provided and properly used in

accordance with this Policy and applicable safe work procedures;

- Instruction and training of workers in the proper use, limitations, care, and maintenance of PPE.

6.6. Visitors

Visitors to ABC Company workplaces are responsible for wearing whatever PPE is required in the particular work area or facility they visit, as well as with complying with the ABC Company Workplace Safety for Visitors' policy.

7. PROCEDURES

7.1. PPE Hazard Assessment

A qualified person(s) will conduct hazard assessments to identify hazards that may require PPE to control, in consultation with the JHSC, Safety Rep and workers required to use the PPE. Identified hazards will be assessed to determine their severity. Measures will then be selected to eliminate or control hazards.

7.2. General Selection of PPE

Where use of PPE is determined necessary to control a hazard, appropriate PPE will be selected in accordance with the following principles:

- PPE must meet the requirements applicable to the particular item under the OHS Regulations, including any CSA, ANSI or other standards incorporated into the Regulations by reference;
- PPE must not in itself create a hazard to the person wearing it;
- PPE must be compatible with PPE currently being used so that one item of PPE does not render another item ineffective;
- If use of PPE creates hazards equal to or greater than

those its use is intended to protect against, alternative PPE must be used or other appropriate measures taken; and

- PPE should be comfortable, properly fit and be usable by workers required to wear it.

8. HAZARDS & OPERATIONS REQUIRING HAND PROTECTION

8.1 Hand-Arm Vibration

Workers that operate grinders, jack hammers or other vibrating machinery or equipment or who are otherwise exposed to hand-arm vibration must wear protective gloves and use other protective equipment to protect against the hazards of such vibration. *[add if you're in BC] When workers are exposed to hand-arm vibration, ABC Company will ensure, to the extent practicable, that the workers' hands or arms aren't exposed to cold, either from the environment in which the worker is working or as a result of using equipment, or from coming into contact with cold objects.*

8.2 Welding & Hot Work

Workers involved in welding or burning operations must wear appropriate PPE including, among other things, gauntlet gloves and arm protection made of leather or other suitable fire-retardant material.

8.3 Work on Energized Electrical Equipment

If it's not practicable to completely isolate high voltage electrical equipment, rubber gloves and other appropriate electrical protective equipment must that meet applicable standards, including standards, including ASTM D120, Standard Specification for Rubber Insulating Gloves, and ASTM F696, "Standard Specification for Leather Protectors for Rubber Insulating Gloves and Mittens," must be selected, used, stored, tested and maintained. *[add the following for construction work in Ontario] Rubber gloves rated for use with*

voltages above 5,000 volts AC must be tested and certified to ensure they can withstand the voltages for which they're rated at least once every 3 months, if they're in service, or at least once every 6 months, if they're not in service. Rubber gloves must be worn with adequate leather protectors and not worn inside out. Rubber gloves or leather protectors that are damaged or not adequate to protect workers from electrical shock and burn must not be used. Workers will be trained in the proper use, care and storage of rubber gloves and leather protectors.

8.4 Use of Chain Saws

Workers must use proper hand, arm and leg protection when using a chain saw with the hand protection allowing for a proper grip on the chain saw. *[add if you're in BC] Leg protective devices must meet or exceed: (a) general requirements of section 4 of WorkSafeBC Standard – Leg Protective Devices, listed in Schedule 8-A of OHS Regs; (b) the performance requirements of one of the following standards, using the cut-resistance testing protocol set out in that standard:*

- WorkSafeBC Standard – Leg Protective Devices, set out in section 5 of Schedule 8-A, applying a threshold chain speed of 18.3 metres per second or 3,600 feet per minute;
- ASTM F 1414-04 Standard Test Method for Measurement of Cut Resistance to Chain Saw in Lower Body (Legs) Protective Clothing, but applying a threshold chain speed of 16.8 metres per second or 3,300 feet per minute;
- ISO 11393-2 Protective clothing for users of hand-held chain-saws – Part 2: Test methods and performance requirements for leg protectors, applying a Class 2 threshold chain speed of 24 metres per second or 4,724 feet per minute;
- BS EN 381-5:1995 Protective clothing for users of hand-

held chain saws – Part 5: Requirements for leg protectors, applying a Class 2 threshold chain speed of 24 metres per second or 4,724 feet per minute;

Leg protective device worn by a worker must have a label that:

- Is permanently affixed;
- Uses lettering at least 6 mm (1/4 in) high; and
- Clearly indicates all of the following information:
 - The name or trademark of the manufacturer;
 - The standard met or exceeded required for that particular device as listed above; and
 - The year of manufacture of device, unless that information is already marked on the device.

8.5 Battery Changing Operations

If a rechargeable storage battery is charged, or filled with or drained of electrolyte, ABC Company must provide and workers performing the work must use acid-resistant gloves and other necessary PPE and protective equipment, including appropriate protective footwear which may be provided by ABC Company or workers themselves.

8.6 Firefighting Operations

When engaged in structural firefighting, a firefighter must wear protective handwear that meets or exceeds the latest version of NFPA 1971, Standard on Protective Ensemble for Fire Fighting.

8.7 Handling of Sharp Materials

Workers must wear appropriate PPE and protective equipment when handling wire cable or other materials involving risks of puncture, cuts, abrasion, perforation and laceration, including puncture-resistant safety mitts, gauntlets, gloves, footwear, aprons, sleeves, arm protection and leg protection.

8.8 Handling of Infectious Materials

Workers that handle medical waste or other biohazardous or infectious materials or chemicals must wear appropriate PPE and protective equipment, including protective footwear, clothing and gloves made of vinyl, latex or other suitable material to guard against risks of corrosion and infection.

9. USE & MAINTENANCE OF PPE

All required PPE must be used safely in accordance with manufacturer's instructions. Safe work procedures will be developed and implemented for operations requiring the use of PPE. Workers required to use PPE must keep the equipment clean and in good working order. Workers must inspect their PPE before each use and immediately notify their supervisor if they find a defect that they believe may impair the item's effectiveness in protecting against the hazard. Defective items must be removed from service and not used again unless and until a qualified person determines that it is safe to use.

10. INSTRUCTION & TRAINING

Workers required to use PPE will receive adequate training and instruction from a qualified supervisor or other trainer in:

- The correct use, limitations, and maintenance of the PPE; and
- The safe work procedures that apply to operations or work requiring use of PPE.

PPE training will also be provided to new and young workers as part of safety orientation training, when workers' job duties change in a way that requires workers to use the PPE for the first time, and at least once a year. No worker will be required or allowed to carry out work tasks requiring the use of PPE unless and until they adequately complete their PPE training.

11. MONITORING

Steps will be taken to monitor, review, and enforce this Policy and safe work procedures and proper use of PPE including via:

- Addressing PPE condition as part of monthly workplace inspections;
- Observations of PPE use by workers;
- Providing extra PPE training, instruction, and support for workers who need or ask for it; and
- Where necessary, disciplining workers for PPE violations.

12. PRIME CONTRACTORS, CONTRACTORS & SUBCONTRACTORS

All prime contractors, contractors, and subcontractors hired to perform work at an ABC Company workplace requiring the use of PPE will be notified of and required to comply with the terms of this Policy and applicable safe work procedures.

Prime contractors may follow the terms of either this PPE Policy and the applicable safe work procedures developed by ABC Company or alternative PPE policies and procedures that meet the requirements of the Regulation, are coordinated with, and provide at least equivalent protection as ABC Company's Policy and safe work procedures to workers performing the work the prime contractor controls.