PPE and Head Protection Compliance Game Plan

Head injuries are among the most serious a worker can suffer. Unfortunately, they happen all the time. In 2020, 21,458 of the 253,009 lost-time injuries suffered by workers in Canada were injuries to the head, according to the Association of Workers' Compensation Boards of Canada. Leading causes of head injuries include:

- Slips, trips and falls;
- Falling or flying objects;
- Falls from heights;
- Walking into objects; and
- Electrical shock.

The good news is that the injury count would have been significantly higher but for the use of hard hats and other forms of head protection. In addition to preventing serious and even fatal injury, ensuring proper use of head protection at your workplace can keep you out of trouble with OHS inspectors. Here's a look at OHS head protection requirements and a 7-step game plan for complying with them.

Defining Our Terms

This analysis covers general OHS safety headwear rules. Be aware that most jurisdictions also have separate head protection requirements for workers who use certain kinds of

mobile equipment like all-terrain vehicles, snowmobiles, motorcycles and bicycles and/or who engage in particular kinds of operations like industrial firefighting.

Step 1. Perform Safety Headwear Hazard Assessment

Not all workers have to wear head protection’only those who are or may be exposed to the risk of head injury in the workplace. So, the first step in the compliance process is to have a qualified person assess whether any such head hazards exist at your site. In BC and Yukon, the hazard assessment must be done in consultation with the workplace JHSC or health and safety representative. Saskatchewan provides that head hazards are deemed to exist if the workplace is a mine, mill, smelter, forestry or sawmilling operation, construction site, drilling operation or an oil or gas servicing operation.

Step 2: Try to Engineer Away Head Hazards

Under the so-called hierarchy of controls approach followed by Canadian OHS laws, the preferred approach to controlling hazards is to eliminate them completely via engineering and work design solutions. **Example:** Installing a physical barrier to keep overhead objects from falling on the workers below. If engineering controls aren’t reasonably practicable, employers should use administrative or work controls to manage the hazard. PPE is the safety measure of last resort to be used only when there’s no way to eliminate or control the hazard via engineering and administrative methods.

Step 3: Ensure Selection of

Appropriate Head Protection

If PPE is necessary to guard against head injury hazards, ensure that the head protection used meets the required standards. Most jurisdictions require head protection to meet either CSA Z94.1, *Industrial protective headwear ‘ Performance, selection, care, and use*, or ANSI Z89.1, *American National Standard for Industrial Head Protection*, but there are variations:

Required OHS Head Protection Standards by Jurisdiction

Jurisdiction(s)	**Required Standard for Head Protection**
Federal	CSA Z94.1, or ANSI Z89.1
Alberta	CSA Z94.1-05, or ANSI Z89.1 2003, for Type II head protection
British Columbia	CSA Z94.1-05, or CSAZ94.1-15, or ANSI/ISEA Z89.1-2009, or ANSI/ISEA Z89.1-2014
Manitoba	CSA Z94.1-05, or ANSI/ISEA Z89.1-2014 (R2019)
New Brunswick	**Construction:** Class E, Type 1 meeting CSA Z94.1-15, or equivalent standard **Non-construction:** CSA Z94.1-15, or equivalent standard
Newfoundland	CSA -Z94.1, or applicable NFPA Standard for emergency response personnel if there’s danger of head injury from falling, flying or thrown objects or other harmful contacts
Nova Scotia	CSA Z94.1, or ANSI Z89.1
Ontario	Not specified
Prince Edward Island	CSA Z94.1-15

Jurisdiction(s)	Required Standard for Head Protection
Québec	Most recent version of CSA Z-94.1 for any new safety hat manufactured as of April 3, 2014, or CSA Z94.1-05 for older hats
Saskatchewan	Not specified
Northwest Territories/Nunavut	Not specified
Yukon	CSA Z-94.1-05, or ANSI Z89.1-2003, or ANSI Z89.1-2003, or similar standards acceptable to Director

In addition to meeting the required CSA or ANSI standard, you must ensure that head protection:

- Has chin straps or another effective means of keeping the head protection in place for work in high winds or other conditions that may cause it to become dislodged;
- Has a lining to protect the worker from cold conditions;
- Has a nonconductive rating and/or shell adequate to protect workers from electrical shock; and
- Is fluorescent orange or an equally visible colour where being visible is important to the worker's health and safety.

Step 4: If Necessary, Furnish Workers Required PPE at Your Own Expense

The question of who furnishes and pays for required head protection varies by jurisdiction:

- Employer must furnish PPE at no expense to worker: NB, NT, NU, QC, SK;
- Workers must furnish their own head protection: BC;
- OHS laws don't say who must furnish and pay for head

protection: FED, AB, NL, NS, ON, PEI.

In Manitoba, employers must provide and pay for head protection **unless** the site is a construction project, in which case workers must provide their own equipment.

Strategic Pointer: Keep in mind that the employer is responsible for ensuring that the required PPE meets OHS standards, regardless of who provides and pays for it. So, as a practical matter, paying for the equipment may be a worthwhile price to pay for keeping the control you need to ensure compliance.

Step 5. Ensure Proper Head Protection Use & Maintenance

As employer, you're responsible for ensuring that workers properly use and maintain the head protection they're required to wear. So, establish clear safety rules and policies requiring workers to:

- Properly wear safety headwear in accordance with applicable safe work procedures, manufacturer's instructions and the training and instructions they receive;
- Ensure their safety headwear is the correct size and fits properly;
- Clean the equipment with soap and water and other appropriate cleansers'not toxic solvents, which can degrade the hard outer shell;
- Refrain from painting or affixing decals to their head protection;
- Not wear a baseball cap or other covering under their hardhat, or wear it backward, unless permitted by the manufacturer;
- Replace their safety headwear if something hard or fast strikes it, it even if it doesn't appear to be damaged;

and
- Properly store their safety headwear when it’s not in use.

Step 6. Ensure Proper Inspection of Head Protection

Specifically require workers to inspect their head protection, including both the shell and suspension system, for any damage or defects that could undermine its effectiveness, such as cracks, dents, holes or torn suspension components. Any damage or defects discovered should be reported immediately to a supervisor, with the equipment removed from service unless and until a qualified person makes the proper repairs.

Step 7: Train Workers Head Protection Rules

Every worker required to use head protection must, before first use, receive training and instruction from a supervisor or other qualified person covering, at a minimum:

- How the equipment works;
- Why the worker has to wear it;
- Any limitations in the protection the equipment provides;
- How to properly use, maintain, inspect and store the equipment; and
- How to carry out the applicable safe work procedures for operations requiring use of the equipment.

Be sure to verify that workers understand and are capable of applying their training and keep written records documenting the training provided, who furnished it and the date and time of training.

Hard Hats v. Bump Hats

Hard Hats v. Bump Hats

There are two basic types of safety headwear and they're ***not*** interchangeable:

Hard hats, the most common safety headwear, are generally made of thick plastic and have an internal suspension or webbing system that's designed to reduce the impact of items falling and striking workers in the head.

Bump hats have a thinner shell and don't have internal suspension systems the way hard hats do. They're also not subject CSA or ANSI standards the way hard hats are. Bump hats may be used in lieu of hard hats only in workplaces where the sole risk to workers is of bumping their heads and suffering minor injuries, such as cuts, scrapes and bruises.