

PPE & Foot Protection Policy



One of every 10 disabling workplace injuries in Canada is a foot injury, according to the Podiatric Association of Canada. The National Institutes of Health estimates that the average final workers comp settlement for a foot injury is \$27,628, including \$15,762 in medical costs and \$11,866 in indemnity payments. The good news is that most foot 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 foot 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 footwear that's adequate to protect them from the foot 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;

- **“CSA Z195”** means the version of CSA Standard CSA Z195, Safety Footwear, required by the OHS Regulations;
- **“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;
- **“Foot hazards”** means risks or conditions that may result in injury to a worker’s toes or feet, including but not limited injury from crushing, slipping, tripping, uneven terrain, abrasion, musculoskeletal injury, temperature extremes, puncture, corrosive substances and electrical shock;
- **“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;
- **“PPE”** means personal protective equipment;
- **“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 will not require workers to wear footwear that may

pose a hazard to their health or safety.

As with all hazards, ABC Company's preferred approach to managing workplace hazards to a person's feet 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 foot 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 head and other hazards, workers affected by the hazard requiring use of PPE must understand what the PPE does to protect them, what its limitations are, as well as 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 foot hazards have and are required to properly use, inspect, and maintain the required foot protection regardless of who supplies that foot protection 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 PROTECTIVE FOOTWEAR

The foot protection and safety footwear required by this Policy and OHS Regulations must be provided by workers at their sole expense, except for where the terms of an applicable collective agreement or other agreement specifically require ABC Company to pay some or all of the costs of the foot protection and safety footwear *[[add if you're in Manitoba] or where the required footwear consists of: (a) outer foot guards that provide metatarsal protection against workers exposed to substantial risk of a crushing injury to the foot, and/or (b) protective footwear required to protect the worker's feet against the danger of a hot, corrosive or toxic substance]*.

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 foot and other 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 Regulation, including any CSA, ANSI, or other voluntary standards incorporated into the Regulation by reference, 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 foot and other 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 are developed 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 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, and 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.

7.3 Selection of Foot Protection

Where the PPE hazard assessment identifies foot hazards, workers exposed to those hazards must wear safety footwear that provides appropriate protection against the hazard and that meets the requirements of CSA Z195.

- **[Add for Alberta:** or ASTM Standard F2413-05, Specification for Performance Requirements for Protective Footwear, if the PPE to protect the feet was manufactured on or after July 1, 2009]
- **[Add for BC:** or ANSI Standard Z41-1991, American National Standard for Personal Protection – Protective Footwear, British Safety Institution Standard BS EN 345:1993 Specification for Safety Footwear for Professional Use, or British Safety Institution Standard BS EN 346:1993 Specification for Protective Footwear for Professional Use]
- **[Add for Yukon]** or ANSI Standard Z41, Footwear, Protective Personal Protection, or another similar standards acceptable to the Yukon WHCSB.

8. 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.

8. 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.

9. 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;
- Where necessary, disciplining workers for PPE violations.

10. PRIME CONTRACTORS, CONTRACTORS & SUBCONTRACTORS

All prime contractors, contractors, and subcontractor 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.