

PPE: Take 5 Steps to Comply with Requirements for Safety Headwear



Your head contains your brain, probably the most complex organ in the body. But heads are surprisingly fragile. And in the workplace, workers may be exposed to many hazards to their heads, which can result in injuries ranging from bruises, cuts and burns to concussions and fatal brain injuries. To prevent such injuries, the OHS regulations in every jurisdiction require workers to wear proper head protection. Here's a look at the requirements for safety headwear in the OHS regulations and the steps you should take to comply with them.

Defining Our Terms

This article will address only the general safety headwear requirements under the OHS regulations—not specific requirements for certain kinds of workers, such as firefighters, or for certain activities, such as operating an all-terrain vehicle or bicycle.

TAKE 5 STEPS

Every jurisdiction includes requirements in its OHS regulations for protecting workers' heads. (See this chart for the general safety headwear requirements in each province and territory.) Although there are some differences, these requirements are typically very similar. Of course, you should always consult and comply with the requirements in your jurisdiction's OHS law. But to help you ensure that you adequately protect workers' heads from injury, take these general steps:

Step #1: Determine if Safety Headwear Is Required

The OHS regulations generally require the use of safety headwear when workers are exposed to the risk of injury to their heads. For example, the *OHS Regulations* in BC require safety headgear to be worn by a worker in any work area where there's a danger of head injury from falling, flying or thrown objects, or other harmful contacts [Sec. 8.11(1)]. Also, if a worker's work clothing or skin is likely to be contaminated by hazardous substances, you may

need to provide an appropriate protective head cover.

In addition, certain kinds of workplaces, most notably construction sites, are presumed to pose a safety hazard to workers' heads and so safety headwear is usually required by all workers in such workplaces. In addition to construction sites, safety headwear may also be required at:

- A mine, mill or smelter;
- A forestry, sawmilling or logging operation;
- A drilling operation; and
- An oil or gas servicing operation.

Step #2: Determine Appropriate Type of Safety Headwear

If you've determined that workers are required to use head protection, you next need to determine the appropriate type of safety headwear, which in most cases will be some type of hard hat. (See the box at the bottom for the difference between hard hats and bump hats.) This determination may be based on the nature of the head hazards. For example, if a worker may be exposed to electrical hazards, the safety headgear should have an appropriate non-conductive rating. The appropriate type of safety headwear may also depend on the type of workplace, with some jurisdictions having one requirement for construction sites and another for other non-construction worksites where the risk of a head injury is present.

Most jurisdictions also require safety headwear to comply with either of the following standards:

- CSA Z94.1'05, *Industrial Protective Headwear*, which divides hard hats into three classes according to intended use; or
- ANSI Standard Z89.1'2003, *American National Standard for Industrial Head Protection*, which uses the same class system as the CSA standard.

In addition, the OHS regulations may have general requirements that apply to all safety headwear. For example, hard hats may need to be red, orange or another very visible color or have reflective decals if worker visibility is a safety issue.

You may also need to ensure that workers have liners for their safety headwear if they'll be working in or exposed to cold conditions. And safety headwear may require some kind of retention system such as a chin strap if workers are working at heights, in windy conditions or in other circumstances in which their hard hats could get dislodged.

Step #3: Provide or Require Workers to Provide Appropriate Headwear

Once you've figured out the appropriate type of safety headwear, you must either provide such head protection for workers or ensure that they provide their own headwear. Whether you or workers must provide or pay for safety headwear depends on your OHS law and any collective agreements. Regardless of who pays for or provide the safety headwear, it *must* comply with the OHS requirements discussed above.

Step #4: Set Rules for Use & Care of Safety Headwear

As with all PPE, you should set safety rules for the use and care of safety headwear. At a minimum, your rules should require workers to:

- Wear safety headwear when needed or required by your OHS program or OHS law;
- Ensure their safety headwear is the correct size and fits well;
- Clean their safety headwear using only appropriate cleansers, such as basic soap and water—not toxic solvents, which can degrade the hard shell;
- Inspect their hard hats—both the shell and suspension system—for any damage that could undermine its effectiveness, such as cracks, dents, holes or torn suspension components;
- Replace their safety headwear whenever it's been struck by something—even if it doesn't appear to be damaged; and
- Properly store safety headwear when it's not in use so it doesn't get damaged.

In addition, your safety rules should prohibit workers from doing the following:

- Wearing casual hats such as baseball hats in lieu of or underneath hard hats;
- Using damaged or defective safety headwear;
- Carrying items inside their hard hats (unless permitted by the manufacturer);
- Wearing headwear backwards (again unless permitted by the manufacturer); and
- Painting hard hats or affixing decals to them (the adhesive may interact with the shell and reduce its strength).[\[/learn_more\]](#)

Step #5: Train Workers on Safety Headwear Rules

As always, you should train workers on your rules for safety headwear and ensure that workers understand these rules and comply with them on the job. You should also periodically review these rules with workers.

BOTTOM LINE

Whether a worker is wearing a hard hat can literally mean the difference between life and death. For example, a 70 lb. metal beam fell from the seventh storey of a condominium development and struck a worker on the head, face and torso. He was taken to the hospital in serious condition but survived. Police credited the worker's hard hat with saving his life. Unfortunately, a 58-year-old man who was delivering wallboard to a construction project wasn't so lucky. He parked his truck and stepped from the vehicle when he was hit by a one-pound tape measure, which had slipped off the belt of a construction worker at the top of the tower under construction. The man, who *wasn't* wearing a hard hat at the time, was struck in the head and knocked unconscious. He was taken to the hospital, where he died. *The lesson:* Follow these steps to choose appropriate safety headwear and ensure that workers use it when needed.

Hard Hats v. Bump Hats

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

Hard hats. 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. The hard outer shells may also resist shocks and punctures. Hard hats generally conform with CSA or ANSI standards for safety headwear. So when workers are exposed to the risk of being hit in the head by tools, materials or equipment, they'll likely need to wear hard hats.

Bump hats. Workers in some workplaces are only at risk of bumping their heads and suffering minor injuries, such as cuts, scrapes and bruises. For example, a mechanic may only be at risk of hitting his head on a car while working underneath it. In such cases, workers may be adequately protected by wearing so-called 'bump hats' or 'bump caps.' Bump hats have a hard shell that's usually thinner than a hard hat and don't have internal suspension systems. In addition, bump caps aren't required to comply with CSA or ANSI standards. [/box]