## Spot The Safety Violation: Protect Your Feet with Appropriate Footwear



What should this man be wearing on his bare feet to keep them safe at this waste facility'

It's easy to take your feet for granted and forget that they need protection from workplace safety hazards, too. For example, feet can be at risk of suffering burns or lacerations or getting crushed if they're not properly protected. Of course, feet are never more vulnerable then when they're completely naked.

This photo, submitted by subscriber J. Dennis, was taken at a waste facility as the man was unloading his garbage. Can you imagine the various hazards at this facility to which his bare feet were exposed' Even basic street or athletic shoes would provide more protection than, well, nothing!

It's unlikely that your workers would show up to work with bare feet'but that doesn't mean that they'll always wear the right foot protection.

## TAKE 3 STEPS TO PROTECT WORKERS' FEET

The OHS regulations across Canada spell out <u>requirements for</u> <u>safety footwear</u>, typically in the general PPE section. Although the requirements vary by jurisdiction, in general, to comply, you should take the following three steps:

1. Conduct safety footwear risk assessment. All jurisdictions require employers to be aware of and protect workers from the hazards in the workplace that could endanger their feet. So conduct a risk assessment to determine whether such hazards are present, including:

- Slipping;
- Uneven terrain;
- Abrasion;
- Ankle protection;
- Foot support;
- Crushing potential;
- Temperature extremes;
- Corrosive substances;
- Puncture hazards;

- Electrical shock; and
- Any other recognizable foot hazard.

Make sure your assessment is thorough and covers all workers who could potentially be exposed to a foot hazard. (Use this <u>safety footwear risk assessment checklist</u>.) If your assessment misses some hazards or at-risk workers, an OHS inspector may hit you with a compliance order.

*Example*: An Ontario inspector issued a safety order requiring a store to ensure that all workers exposed to the risk of a foot injury wear appropriate foot protection. The store asked the Labour Relations Board to suspend the order because it already required workers who operate pump jacks to wear safety toe caps. The Board refused. As the inspector noted, other workers in the receiving area and who handled stock were also exposed to foot injuries and so should have to wear appropriate foot protection as well [*Dollarama LP v. Marcelo*, [2011] CanLII 46599 (ON LRB), July 22, 2011].

2. Ensure workers wear appropriate safety footwear. If the assessment reveals that some or all of your workers are exposed to foot hazards, determine the type of safety footwear that's appropriate to protect your workers' feet from the identified hazards and ensure that workers wear such footwear. Many OHS laws require safety footwear to comply with the CAN/CSA Z-195-09 *Protective Footwear* standard, which covers:

- Design requirements for safety footwear;
- Performance requirements;
- Test methods for ensuring compliance with the above requirements; and
- Marking and labelling of safety footwear so users know which types of safety footwear should be used in which circumstances.

It's also important to make sure that workers' footwear doesn't actually <u>create a safety hazard</u>.

Note that whether you or the worker must <u>pay for safety</u> <u>footwear</u> depends on the OHS laws in your jurisdiction.

3. Ensure that safety footwear is properly maintained. Safety footwear will only adequately protect workers' feet is it's properly maintained. So ensure workers regularly clean their safety footwear and inspect it for damage, defects or regular wear-and-tear, such as worn out soles that no longer provide sufficient traction. And make sure that safety footwear that no longer provides adequate protection is replaced.