Spot The Safety Violation: Turban + Hardhat = Ineffective Head Protection



How much protection, if any, do you think this hardhat is providing for this worker'

PPE such as safety glasses, respiratory protection and safety footwear can help protect workers from hazards that can't be eliminated through engineering or administrative measures. But for PPE to effectively protect workers, they must use it properly.

This picture shows a worker wearing a hardhat. Usually, you'd applaud such a worker for using his PPE. But in this case, it's doubtful that the hardhat is actually providing any head protection at all given that its gingerly perched on the top of his turban. (It's surprising that the hardhat is even staying in place at all.)

Your initial reaction to this photograph may be that someone should tell the worker to remove his turban so he can properly wear the hardhat and protect his head from injury. But given the worker's turban and beard, he may be a Sikh and thus wearing the turban for religious reasons.

If that's the case, you need to adequately balance religious freedom and workplace safety to avoid discrimination. For

example, if wearing a hardhat is a ‘bona fide occupational requirement,’ such as because the workplace is an active construction site, you should try to accommodate the worker’s religion by:

- Making an exception to the hardhat policy, if you can still keep the worker safe;
- Reassigning the worker to duties or a worksite where the hardhat isn’t required;
- Changing the worker’s schedule so he can avoid exposure to the hazard addressed by the hardhat; and
- Asking the OHS regulator for an exception from compliance with the OHS requirement that relates to the hardhat.

5 STEPS TO COMPLIANCE WITH SAFETY HEADWEAR REQUIREMENTS

Every jurisdiction includes requirements in its OHS regulations for protecting workers’ heads. You should always consult and comply with the requirements in your jurisdiction’s OHS law. But to ensure that you adequately protect workers’ heads from injury, take these general steps:

Step #1: Determine if Safety Headwear Is Required

The use of safety headwear is generally required when workers are exposed to the risk of injury to their heads, such as from falling, flying or thrown objects, or other harmful contacts. In addition, certain 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.

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. This determination may be based on the nature of the head

hazards and the type of workplace.

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. And they 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. (See, 'PPE: Can Employers Make Workers Pay for Their Own Protective Equipment'')

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

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 bar 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 non-required decals to them.

Step #5: Train Workers on Safety Headwear Rules

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. (Give this head safety toolbox talk handout to workers as part of their training.)