

Personal Protective Equipment

“Oh, so that’s what an invisible barrier looks like.”

By Dan Zuhlis

Following a labor dispute with the Supreme Being, Fidget and his band of dwarf robbers shattered an invisible barrier by throwing a human skull through it (the movie *Time Bandits*, 1981). Invisible barriers are much easier to find in the workplace because they are demarcated using lines, signs and “write-ups.” These invisible barriers are not so easy to shatter.

Invisible barriers are used throughout industry to administrate personal protective equipment (PPE) programs. “Hearing protection required beyond this line.” “Hard hat required beyond this point.” “Safety goggles required at all times.” “Respirator required in the production area.”

Mountains of these citations are issued to employees who fail to wear hearing protection in quiet rooms, hard hats in open areas, safety goggles inside inactive warehouses and respirators within contaminant-free areas. Worker safety is not unique in this respect. I have seen bald men written up for not wearing hairnets in food plants. These invisible barrier write-ups are issued to make enforcement easier and, according to many, more consistent. Adding insult to overzealous injury protection, these barriers frequently result from injuries that were never analyzed for the root cause, assessed for future likelihood or reassessed after operations changed.

This all-too-common management practice almost ensures that employees will become desensitized to the importance of personal hazard identification. And frankly, it just plain ticks them off. People rarely resist counseling when they directly associate the counseling with the risk. In my experience, employees usually

interpret such counseling as caring. In contrast, employees view the enforcement of invisible barriers as needless punishment.

OSHA’s new PPE rule makes it clear that protective equipment should be issued “... wherever it is necessary by reason of hazards.” The standard instructs us to assess the workplace for hazards when they “are likely to be present.” It does not instruct us to enforce the use of PPE when we all know the hazard is not present. If my interpretation is wrong, I hereby motion for the enactment of a Culture Protection Standard.

Hazard assessments, assigning PPE and enforcing equipment use are complicated tasks that require thoughtful consideration and ongoing evaluation. Active Agenda can help organizations by providing a standard method for conducting and recording these assessments and PPE assignments.

The Controls and the Job Analyses modules help organizations record PPE assignments at the task level to improve employee education (supervising or supervised), monitor assessment frequencies and more easily view, track, certify and update equipment assignments. Ultimately, the Controls module enables more thoughtful equipment use and enforcement practices.

The Controls module also helps automate the ANSI Z10 Hierarchy of Controls, and it doesn’t stop there. The module can be used when assigning equipment to hazards, whether a hazard represents a risk to an employee, a product or an operation.

Using invisible barriers to enforce PPE policies may unwittingly protect more than is intended. Such practices may perpetuate negative culture, much

like the Fortress of Ultimate Darkness in *Time Bandits*.

What Gets Measured

Whether you subscribe to the Three E’s (engineering, education and enforcement), the more recent hierarchy of control (engineering, administration and PPE), or ANSI Z10’s Control Hierarchy (elimination, substitution, engineering, warnings, administration and PPE), they all share a common trait – PPE and enforcement should be a last resort. Is that true in your organization?

The Controls module can answer this question with a Pareto chart that reflects your actual control hierarchy practices. The Controls module also can quantify the frequency of PPE assignments by organization, category, type and other factors that help analyze the characteristics of an organization’s PPE program.

Finally, the Corrective Actions module can quantify the frequency of disciplinary action taken when employees fail to wear PPE. This chart can be used as a map for locating invisible barriers.

What Gets Done

The Controls module helps organizations improve the practicality and effectiveness of PPE programs. The Controls and Corrective Actions modules make it possible to find and shatter invisible barriers.

This Month’s Links:

Demo: demo.activeagenda.net/list.php?mdl=cnt

Wiki: activeagenda.net/documentation/index.php?title=Controls_Module

Forum: activeagenda.net/discussions/viewforum.php?i=10

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