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I. Purpose
The purpose of this Fall Protection Policy is to establish guidelines to protect all employees engaged in work activities that expose them to the potential for falls from elevations.

II. Scope
This policy applies to those employees whose work activities expose them to potential falls from elevations at heights of 4 feet or more. All outside contractors working in or on the premises of Villanova University will be required to follow guidelines consistent with those set forth in this Fall Protection Policy.

III. Definitions

**Anchor Point:** A secure point of attachment for lifelines, lanyards, or deceleration devices. An anchor point must be capable of supporting at least 5000 pounds (3600 pounds if engineered/certified by a qualified person) per person and must be independent of any anchorage being used to support or suspend platforms.

**Authorized Person:** A person trained and assigned by supervision to perform a specific type of duty or duties or to be at a specific location or job site (ex., hanging lights, building maintenance, roof repair, tree work, etc.).

**Competent Person:** A person trained to identify existing and predictable fall hazards in the surroundings or working conditions, which are hazardous or dangerous to employees. A person who has the authorization to take prompt corrective action to eliminate such hazards.

**Connector:** A device which is used to couple (connect) parts of the personal fall arrest system together.

**Deceleration Device:** Any mechanism, such as a rope grab, rip-stitch lanyard, a specially woven lanyard, tearing or deforming lanyard, automatic self-retracting lifeline/lanyard, etc., which serves to dissipate a substantial amount of energy during a fall arrest.

**Deceleration Distance:** The additional vertical distance a falling employee travels excluding lifeline elongation and free fall distance, before stopping, from the point at which the deceleration device begins to operate. It is measured as the distance between the location of an employee’s body harness attachment point at the moment of activation of the deceleration device during a fall, and the location of that attachment point after the employee comes to a full stop.

**Free Fall:** The act of falling before a personal fall arrest system begins to apply force to arrest the fall.
**Free Fall Distance:** The vertical displacement of the fall arrest attachment point on the employee’s body harness between the onset of the fall and just before the system begins to apply force to arrest the fall. **Free fall distance must not exceed 6 feet.** This distance excludes deceleration distance and lifeline/lanyard elongation distance.

**Full Body Harness:** Webbing/straps which are secured about an employee’s body in a manner that will distribute the fall arrest forces over the thighs, pelvis, waist, chest and shoulders; having means for attaching it to other components of a personal fall arrest system, preferably at the shoulders and/or middle of the back.

**Guardrail System:** A barrier erected to prevent employees from falling to lower levels. This system includes a toeboard, midrail and toprail able to withstand 200 pounds of force applied in any direction.

**Lanyard:** A flexible line of rope or strap that has self-locking snap hook connectors at each end for connecting to body harnesses, deceleration devices, and anchor points.

**Lifeline:** A component consisting of a flexible line for connection to an anchorage at one end to hang vertically (vertical lifeline), or for connection to anchorages at both ends to stretch horizontally (horizontal lifeline). This serves as a means for connecting other components of a personal fall arrest system to the anchorage.

**Low Slope Roof** – A roof having a slope of less than, or equal to, 4 inches in 12 (vertical to horizontal.) A roof with approximately a 19.5 degree slope or less.

**Personal Fall Arrest System:** A system used to arrest (catch) an employee in a fall from a working level. It consists of an anchorage location, connectors, a body harness, and may include a lanyard, deceleration device, lifeline, or any combination of the before-mentioned items.

**Qualified Person:** An individual, who by possession of a recognized degree, certificate, or professional standing or who by extensive knowledge, training, and experience, has successfully demonstrated his/her ability to solve or resolve problems relating to fall protection work, or project.

**Restraint System:** A system designed, and engineered, to prevent a worker from reaching the leading edge of a fall hazard. The system must include an anchor point capable of withstanding a load of 3,000 pounds and a restraint rope or lanyard with a self-locking snap hook at both ends.

**Roof Work** – The hoisting, storage, installation, repair and removal of materials or equipment on the roof.
Rope Grab: A deceleration device, which travels on a vertical lifeline and automatically, by friction, engages the lifeline and locks to arrest the fall of an employee.

Snaphook: A connector comprised of a hook-shaped member with a closed keeper which may be opened to permit the hook to receive an object and when released, automatically closes to retain the object. Snaphooks must be self-closing with a self-locking keeper which remains closed and locked until unlocked and pressed open for connection or disconnection, thus preventing the opportunity for the object to “rollout” of the snaphook.

Steep Slope Roof
A roof having a slope of greater than 4 inches in 12 (vertical to horizontal.) A roof with a slope greater than 19.5 degrees.

Toeboard: A low protective barrier that will prevent the fall of materials and equipment to lower levels, usually 4 inches or greater in height.

Total Fall Distance: The maximum vertical change in distance from the bottom of an individual’s feet at the onset of a fall, to the position of the feet after the fall is arrested. This includes the free fall distance and the deceleration distance.

Unprotected Sides and Edges: Any side or edge of a walking or working surface (e.g., floor, ramp, runway, roof, etc.) where there is no guardrail system at least 42 inches high.

Walking/working surface: means any surface, whether horizontal or vertical on which an employee walks or works, including, but not limited to, floors, roofs, ramps, bridges, runways, formwork and concrete reinforcing steel but not including ladders, vehicles, or trailers, on which employees must be located in order to perform their job duties.

Warning Line System – A barrier erected on a roof to warn employees that they are approaching an unprotected roof side or edge, which designates an area in which work can be conducted without the use of guardrails or personal fall arrest systems to protect employees in the area. This will be utilized on any roof where all other forms of fall protection have been deemed impractical to use.

IV. Policy Statement
The goal of this Fall Protection Policy is to prevent the occurrence of falls from elevations of 4 feet or higher. This goal will be accomplished through effective education, engineering and administrative controls, use of fall protection systems, and enforcement of the Policy.
V. Procedures

A. Types of Fall Protection Systems

1. Any elevating man lift that is capable of self-propelled motion. The lift shall be equipped with one or more anchor points, preferably below the waist, to which a lanyard attached to a full body harness can be attached.

2. Manually propelled vertical lifts equipped with a guardrail system.

3. Scaffolding equipped with a guardrail system.

4. Platform, or work surface equipped with a guardrail system at least 42” high consisting of a toprail, midrail and toeboard.

5. Personal fall arrest system, consisting of:
   a. Anchor points (rated at 5000 pounds per person).
   b. Full body harness.
   c. Connector and lanyard or restraint line.

6. Personal restraint system.
   a. Anchor points (rated at 5000 pounds per person).
   b. Full body harness.
   c. Restraint line or lanyard
   d. Connectors (self-locking snaphooks)

7. Controlled access zone, consisting of:
   a. A warning line system.

8. The appropriate fall protection will be determined by a pre-job discussion performed before the work is started.

B. Fall Protection Locations

Fall protection is required wherever the potential to fall 4 feet or more exists. The Director of Maintenance, in consultation with the Office of Environmental Health & Safety has identified the following places where fall protection must be utilized:

1. All flat and sloped roof locations when working within six feet or the roof edge during roof repair/maintenance.
2. Any Green Roof requiring access by University personnel.
3. All interior and exterior equipment platforms, catwalks, elevating lifts and scaffolds.
4. All mezzanine and balcony edges and catwalks.
5. All tasks requiring use of scaffolds or elevating man lifts.
6. All tasks in which there is the probability of an employee to lean outside the vertical rails of ladders (e.g., painting, carpentry, light hanging, etc.).
7. Any task performed from a ladder on which three point contact cannot be maintained.
8. Scaffolding erection – 10 feet in height or greater.
9. All exterior and interior fixed ladders above 20 feet.
10. All open pits or excavations greater than 5 feet in depth.
C. Fall Protection Guidelines / Options

1. Engineering / Administrative Controls

   Engineering controls are always the preferred fall prevention option. An engineering control could include, but is not limited to, utilization of remote systems, where practical, to eliminate the need for working from heights.

   Engineering controls should also assure that gaps or holes in a wall or walking/working surface through which employees can fall to a lower level are adequately protected. Covers must be engineered to withstand twice the expected load.

   Administrative controls can include the use of Controlled Access Zones, and the use of personal fall restraint systems. When a personal fall restraint system is used it shall be rigged to allow the movement of the employee only as far as the Controlled Access Zone warning line.

2. Guardrails

   When engineering controls are impractical, guardrails made only from materials capable of carrying the anticipated load will be acceptable. All guardrail systems will comply with the current OSHA standards (i.e., contain a 42” high toprail, a midrail and toeboard, and can withstand 200 pounds of force in any direction). Guardrails shall be placed in the following areas based on work location or requirements:
   a. On all open sided floors.
   b. On all open sided work platforms.
   c. Around all open excavations or pits.
   d. On leading edges of mezzanines.
   e. On all elevating man lifts.
   f. Surrounding roof access hatches and skylights.

3. Personal Fall Protection Systems

   All employees working on any project that requires the use of a personal fall arrest or restraint system must complete the training mandated in Section H of this policy and follow these guidelines:
   a. A full body harness must be used when mandated.
   b. Harnesses, and components shall be used only for employee protection (as part of a personal fall arrest system) and not to hoist materials.
   c. When required, only self-retracting or shock absorbing lanyards may be used so as to keep impact forces at a minimum on the body.
   d. Only nylon rope or nylon straps with locking snaphooks may be used for restraints.
   e. All lanyards must have self-locking snaphooks.
   f. The user must inspect all personal fall arrest equipment before each use. Any deteriorated, bent, damaged, or impacted item or harness showing excessive wear must be removed from service.
4. Fall Arrest Equipment Use
   a. The buddy system applies – working alone in any application that requires fall
      protection is strictly prohibited.
   b. Use a co-worker to assist in donning the harness and attaching the lanyard to the
      back D-ring.
   c. Do not allow the snap hook at the front of the lanyard to drag; attach it to the front
      of the harness when moving about.
   d. Except for mobile equipment where the anchor point is below the waist, the ideal
      anchor point is above the head.
   e. Personnel working from a mobile elevating manlift may only tie-off to an
      approved anchor point on the lift. Tie-off to an adjacent structure or other
      equipment is prohibited.
   f. In the rare instances when an employee must exit an elevated manlift (e.g., to get
      to a roof) special care must be exercised. 100% tie-off is mandated at all times.
      Use of a double legged lanyard is required; one leg must remain attached to the lift
      until the second leg is attached to an anchor point on the roof or structure. Only
      then can the first leg of the lanyard be detached.

5. Lifeline Systems
   Lifeline systems must be engineered to have appropriate anchorages. The strength of the
   line must be designed to hold the number of employees connected to it. Additionally the
   line must possess adequate strength to aid in the arrest of a fall, and durability to hold a
   fallen employee suspended until a rescue can occur.
   Lifelines must be designed and/or approved by a professional engineer.

6. Controlled Access Zone
   All work on a flat roof which is performed 6 feet or greater from the edge of a roof can be
   completed by establishing a Controlled Access Zone. The Zone demarcation line will
   guard the entire perimeter of the roof, and can be established by either of the following
   methods:
   a. By installing wood or metal stationary post and stringing wire or nylon rope from
      post to post. The strung material must be capable to withstand 16 pounds of force
      (preferred).
   b. Painting lines on the roof surface at 6 feet from the nearest edge (alternative). If
      this method is used the lines must be periodically repainted as they fade.
   c. If an employee must access an area within 6 feet of the roof’s edge, for reasons
      other than exiting the roof via a ladder or fixed industrial ladder the employee must
      don a full body harness and attach a fall restraint lanyard to an anchor point to
      prevent reaching the edge of the roof.
D. Calculating Total Fall Distance
The permissible total fall distance is the distance an employee can fall before the fall arrest equipment brings him to a stop. Serious injury can result if this does not occur before the employee strikes a lower level, or an obstruction. Accordingly, calculation of the fall distance must be a consideration in the pre-job discussion. The total fall distance can be calculated using the following formula:

\[ TFD = FFD + DD + HEFF + SF \]

**Total Fall Distance (TFD):** The total fall distance an employee can fall before the fall arrest equipment brings him to a complete stop.

**Freefall Distance (FFD):** The vertical distance an employee travels between the onset of a fall until just prior to the point where the fall arrest equipment begins to arrest the fall, OSHA limits this distance to 6’ or less.

**Deceleration Distance (DD):** The vertical distance an employee travels between the activation of the fall arrest system and final arrest. OSHA limits this distance to 3.5’ or less.

**Harness Effects (HEFF):** The stretch of a harness during fall arrest. This is typically 1’ or less for a properly fitted harnesses.

**Safety Factor (SF):** An addition factor of safety to assure the existence of the required clearance below the working surface (minimum 3’).

E. Inspection of Fall Protection Systems
The following criteria will be utilized to maintain all equipment in good working condition:

1. Full Body Harnesses
   a. The user shall inspect before each use.
      - Closely examine all of the nylon webbing to ensure there are no burn marks, which could weaken the material.
      - Verify there are no torn, frayed or broken fibers, pulled stitches, or frayed edges anywhere on the harness.
      - Examine the D-ring for excessive wear, pits, deterioration, or cracks.
      - Verify that buckles are not deformed, or cracked, and that they operate correctly.
      - Check to see that each grommet (if present) is secure and not deformed from abuse or a fall.
      - The harness should never have additional punched holes.
• All rivets should be tight and not deformed.
• Check tongue/straps for excessive wear from repeated buckling.
• Assure that the harness is not discolored and weakened from exposure to sunlight.

b. At least quarterly, a Competent Person will complete an inspection of all harnesses utilizing the parameters above. These inspections must be documented in the equipment instruction manual and on the inspection grid label located on the harness.

c. Upon expiration of the manufacturer’s specified service limits (5 years) the harness shall be removed from service and replaced. The harness shall be removed from service earlier than five years if it has been subjected to a fall, damaged, or the manufacturer’s label is not legible or is missing.

d. Storage will consist of hanging in an enclosed cabinet, to protect from damage.

e. All harnesses that are involved in a fall must be immediately removed from service and returned to the manufacturer.

2. Shock Absorbing Lanyards

a. The user shall inspect before each use.
   • Visually inspect the body to ensure there is no physical damage to the webbing.
   • Make sure the entire length of the lanyard strap is free from any cuts, burns, abrasions, kinks, knots, broken stitches/strands, and excessive wear.
   • Inspect the snaphooks for distortion in the hooks, locks and eye.
   • Ensure that all locking mechanisms seat/lock properly.
   • Once locked, locking mechanisms should prevent the hook from opening.
   • Visually inspect the shock absorber for any signs of damage, paying close attention to where the shock absorber attaches to the lanyard strap.
   • Verify that all required labels are present and fully legible.

b. At least quarterly, a competent person will complete an inspection of all lanyards utilizing the parameters above. These inspections must be documented in the equipment instruction manual and on the inspection grid label located on the lanyard.

c. Upon expiration of the manufacturer’s specified service limits (5 years) the shock absorbing lanyard shall be removed from service and replaced. The lanyard shall be removed from service earlier than five years if it has been subjected to a fall, damaged, or the manufacturer’s label is not legible or is missing.
d. Storage will consist of hanging in an enclosed cabinet, to protect from damage.
e. All lanyards involved in a fall must be immediately removed from service and returned to the manufacturer.

3. Self-Retracting Lanyards (SRL)
   a. The user shall inspect before each use.
      • Visually inspect the body to ensure there is no physical damage to the body.
      • Make sure all nuts and rivets are tight.
      • Make sure the entire length of the nylon strap/wire rope is free from any cuts, burns, abrasions, kinks, knots, broken stitches/strands, excessive wear and retracts freely.
      • Test the unit by pulling sharply on the lanyard/lifeline to verify that the locking mechanism is operating correctly.
      • Verify that the coil pin securing the swivel is fully inserted in the SRL housing and the fastening screw is secure.
      • Verify that all required labels are present and fully legible.
   b. Currently, there are no SRLs in use in the departments covered under this Policy. If in the future SRL’s are purchased they must be inspected at least quarterly utilizing the parameters above. These inspections must be documented in the equipment manual and on the housing of the SRL.
   c. Upon expiration of the manufacturer’s specified service limits (5 years) the self-retracting lanyard shall be removed from service and replaced. The self-retracting lanyard shall be removed from service earlier than five years if it has been subjected to a fall, damaged, or the manufacturer’s label is not legible or is missing.
   d. All self-retracting lanyards involved in a fall must be removed from service and returned to the manufacturer.

4. Snaphooks
   a. The user shall inspect before each use.
      • Inspect snaphook for any hook and eye distortions.
      • Verify there are no cracks or pitted surfaces.
      • The keeper latch should not be bent, distorted, or obstructed.
      • Verify that the keeper latch seats into the nose without binding.
      • Verify that the keeper spring securely closes the keeper latch.
      • Test the locking mechanism to verify that the keeper latch locks properly.
b. At least quarterly a competent person shall conduct an inspection of all snaphooks. This inspection shall be conducted and documented as a part of the shock absorbing lanyard inspection.

c. All snaphooks involved in a fall must be immediately removed from service and returned to the manufacturer.

5. Tie-Off Anchorages
   a. Inspect for integrity and attachment to solid surface.
   b. Annually, the Office of Environmental Health & Safety shall arrange for a competent vendor to complete an inspection of all building and or roof tie-off anchorages. The vendor shall provide written re-certification of these inspections. Documentation will be maintained by the office of Environmental Health for three years.
   c. Any anchorage point which has been subjected to a fall incident shall be immediately removed from service until recertified by a competent person.

6. Elevating Man Lift
   a. The user shall inspect the lift before each use in accordance with the manufacturer’s placard on the unit.
   b. Facilities shall insure the unit is inspected/serviced per manufacturer guidelines annually for University owned equipment. For rental equipment, the supplier shall perform these inspections and provide the University with evidence of the inspection with the rental agreement.

7. Horizontal Lifelines
   a. The user shall inspect the line before each use for structural integrity of the line and anchors.
   b. Where applicable, The Office of Environmental Health & Safety shall arrange for a competent vendor to complete an annual inspection of all lifelines. Documentation will be maintained for three years by the Environmental Health & Safety Office. The vendor shall provide written re-certification of these inspections.

8. Guardrails
   a. Temporary systems – The Departmental Safety Contact (page 15) shall conduct a daily visual inspection of the system.
   b. Temporary systems – The Departmental Safety Contact (page 15) shall conduct a weekly structural inspection.
c. Permanent systems – Annual structural inspections will be completed by a competent person designated by the Director of Maintenance.

F. Storage and Maintenance of Fall Protection Equipment
   1. Never store the personal fall arrest equipment in the bottom of a toolbox, in a vehicle, on the ground, or outdoors exposed to the elements (i.e., sun, rain, snow, etc.).
   2. Hang equipment in a cool, dry location in a manner that retains its shape.
   3. Always follow the manufacturer recommendations for inspections.
   4. Clean with a mild, nonabrasive soap and hang to dry.
   5. Never force dry or use strong detergents in cleaning.
   6. Never store equipment near heat sources, chemicals, moisture, or sunlight.
   7. Never store in an area with exposures to fumes or corrosive elements.
   8. Avoid dirt or other types of build-up on equipment.
   9. Never use this equipment for any purpose other than personal fall arrest.
   10. Once exposed to a fall, remove equipment from service immediately.

G. Personal Protective Equipment
   Employees performing a task in which a hazard exists that cannot otherwise be mitigated by engineering or administrative controls shall be trained in the use of and must wear a full body harness and shock-absorbing lanyard attached to an approved anchor point. The supervisor of the Authorized Employee shall determine the additional Personal Protective Equipment required to safely accomplish the assigned task and assure its use.

H. Training
   The Office of Environmental Health and Safety shall document the attendance of all trainees and retain records for three years.

Prior to engaging in any activity requiring the use of a fall arrest systems, all employees, exposed to a potential fall from height will be trained and have the knowledge to:
   1. Recognize the fall hazards on their job sites.
   2. Understand the hazards associated with working near fall hazards.
   3. Work safely in hazardous areas by utilizing appropriate fall protection measures.
   4. Understand and follow all components of this Fall Protection Policy.
   5. Identify and understand the enforceable OSHA standards that pertain to fall protection.
   6. Understand how to use the trauma relief straps to reduce the effects of suspension trauma in the event of a fall.
   7. Inspect the equipment in accordance with Policy requirements.
I. Enforcement

1. All employees who fail to adhere to the provision of this policy are subject to disciplinary action.
2. Documentation of any violations by employees will be kept in the employee’s personnel file and the Office of Environmental Health & Safety.

J. Rescue Procedures

This section establishes guidelines for responding to an arrested fall from height. These guidelines should ensure that the victim’s health risks are minimized during a fall. The rescue plan shall minimize the at risk behavior of the rescuer during the rescue attempt, and assure that the rescue is conducted in a safe and professional manner.

A rescue plan must be a part of the pre-job discussion for any job that is to be performed that requires work at height. The rescue plan shall include consideration of the following rescue types and circumstances:

1. Self-Rescue.
   If the person working at heights makes proper choices in the equipment to be used and implements that equipment properly, 90% of fallen workers will perform a Self-Rescue which would include:
   a. Worker will climb back up to the level from which he fell (a few inches to 2 or 3 feet).
   b. Worker will return to the floor or ground and be reviewed for possible medical attention.
   c. Remove all components of his fall arrest system from service and document (bag and tag) the components involved in the fall with name, date and activity at time of fall and return to the manufacturer.

2. Assisted Self-Rescue with hauling/rope system.
   If self-rescue is not possible then an Assisted Self-Rescue will be needed.
   The following guidelines should be used during an aided rescue.
   a. The haul line will be secured to an anchor that is deemed stable and suitable.
   b. The haul line may be swung over or lowered to the worker, who will grab the lifeline hook and secure it to the appropriate body support D-ring. A positive connection to the D-ring must be verified by one of the rescue team members.
   c. The rescue team will raise or lower the fallen employee to the appropriate work platform or ground and determine if the rescued worker requires medical attention.
d. Remove all components of his fall arrest system from service and document (bag and tag) the components involved in the fall with name, date and activity at time of fall and return to the manufacturer.

3. Assisted Rescue with mechanically aided aerial lift.
   Another means to perform an Assisted Rescue is with a man-lift using the following guidelines:
   a. A rescuer will move the aerial lift to the site and make sure there is a second fall protection device such as shock absorbing lanyard or self-retracting lifeline available for the rescued worker.
   b. The aerial lift will be maneuvered into position (raise up under the employee to be rescued) to perform the rescue.
   c. Attach the second lanyard or self-retracting lifeline in the aerial lift to the employee being rescued.
   d. Disconnect the rescued employee from the impacted fall arrest equipment.
   e. Lower the employee to the ground and determine if the rescued worker requires medical attention.
   f. Remove all components of his fall arrest system from service and document (bag and tag) with name, date and activity at the time of fall and return to the manufacturer.

4. Fully Assisted Rescue
   If the workers injuries prevent them from attaching themselves to the rescue system, and both self-rescue and assisted self-rescue are not options, a Fully Assisted Rescue is necessary.

   The services and expertise of the Bryn Mawr Fire Department will be utilized to accomplish a fully assisted rescue.

5. Suspension Trauma
   This phenomenon may be experienced by workers who fall while using a fall arrest system. Following a fall, a worker may remain suspended in a harness. Depending on the length of the time the worker remains suspended, physical trauma may result. Ideally an employee who has fallen can rescue him/herself. Villanova must provide for the prompt rescue of employees in the event of a fall should self-rescue not be possible. Rescue procedures must be pre-planned and address the potential for suspension trauma.
Rescue procedures should include the following contingency based actions:

a. If self-rescue is impossible, or if rescue cannot be performed promptly, the worker should be trained to “pump” his/her legs frequently to activate the muscles and reduce the risk of venous pooling. Footholds can be used to alleviate pressure, delay symptoms and provide support for “muscle pumping.”

b. Continuous monitoring of the suspended worker for signs and symptoms of suspension trauma.

c. Ensuring that a fallen worker is transported to the nearest hospital following rescue.

6. Rescue Drill

At least annually, the Director of Environmental Health & Safety shall assure that a rescue drill is conducted. This drill may be included in the training mandated in Section H of this policy.

7. Communication

In the event of a fall a co-worker shall make the following contacts immediately:

a. Public Safety Dispatcher at 4444 or 610-519-4444.

   Provide the Public Safety Dispatcher with as much relevant information as possible. This should include the time and location of the incident, the number of employees involved and the urgency.

   If indicated, Public Safety will request assistance from the Bryn Mawr Fire Department.

b. The Facilities Work Control Coordinator at 9-4420.

c. The appropriate Departmental Safety Contact:

   Rick Finizio, Maintenance - cell - 484-576-3087.
   Hugh Weldon, Grounds - cell - 484-576-9793.
   Mickey Dittbrenner, Custodial - cell - 610-517-5368.

d. The Director of Environmental Health & Safety:

   Alice Lenthe cell - 610-316-2180.

K. Fall Investigation

All fall investigations will be conducted by the employees’ immediate supervisor in conjunction with the office of Environmental Health and Safety.
The following documentation will be completed as part of the fall investigation:

1. Interviews with co-workers and witnesses.
2. Supervisor injury/accident report.
   https://www1.villanova.edu/content/dam/villanova/fmo/documents/EHSForms/HR%20Injury%20Form.pdf
3.

L. Contractors Use of Fall Arrest System
   All outside contractors working in or on the premises of Villanova University will be required to follow guidelines consistent with those set forth in this Fall Protection Policy. Contractors in the pre-job meeting will be informed of these requirements by the cognizant Facilities Supervisor, or Project Manager, as to the on-site work rules that apply.

M. Policy Evaluation
   This Fall Protection Policy will be jointly evaluated periodically by the Director of Maintenance and the Department of Environmental Health and Safety to determine its effectiveness. The following criteria will be used to evaluate its performance:

   1. Accident reports.
   2. Number of accidents and /or “near misses”.
   4. Periodic on-site audits.
   5. Employee feedback and interviews.

VI. Related Information
References:
OSHA Regulations – http://osha.gov
29 CFR 1910 Subpart D – Walking-Working Surfaces
29 CFR 1926 Subpart M – Fall Protection

VII. History – Issued 4-1-16, Revised 4-26-16, 5-27-16.

VIII. Responsible University Division Department
Vice President
Facilities Management Office
800 Lancaster Avenue
Villanova, PA 19085
610-519-4589
IX. **Responsible Administrative Oversight**

Executive Vice President  
Office of the Executive Vice President  
800 Lancaster Avenue  
Villanova, PA 19085  
610-519-4530

RB/mgs – 5-27-16