Understanding OSHA:  
Correct Implementation of a Safety-monitoring System

The Occupational Safety and Health Administration (OSHA) allows use of a safety-monitoring system as a means of fall protection in certain instances. When a safety-monitoring system will be used as a means of fall protection on a roofing project, OSHA imposes certain requirements on construction employers pursuant to 29 C.F.R. § 1926.502(h) and its subparts.

To comply with this standard, foremen and superintendents are advised to take the following actions:

- For low-slope roofing work, first determine whether the roof width is 50 feet or less. On roofs with widths 50 feet or less, a safety-monitoring system can be used without another method of fall protection. On roofs with widths greater than 50 feet, the safety-monitoring system must be used with a warning-line system to ensure proper fall protection.

- If a safety-monitoring system will be used, assign one person to fulfill the safety monitor’s duties. Be sure the person assigned is competent to identify and recognize fall hazards.

- Ensure the safety monitor has no other assigned duties other than to monitor the roofing crew. Instruct the safety monitor to not perform any work that will take his or her attention away from monitoring.

- Ensure the safety monitor stays on the same walking or working surface as the roofing workers he or she is responsible for monitoring. If roofing work is going to be performed on two or more walking or working surfaces, it will be necessary to assign a safety monitor to each walking or working surface where work is to be performed.

- Consider whether the crew being monitored by the safety monitor will be within visual distance to the safety monitor at all times while work is performed and whether the safety monitor is close enough to verbally communicate with the employees being monitored. If some of the work to be performed will take the roofing crew outside the safety monitor’s visual distance, or beyond a distance that allows the monitor to verbally communicate with those being monitored, it may be necessary to assign a second person to serve as a safety monitor or to use a different means of fall protection.

- If mechanical equipment is being used or stored in areas where safety-monitoring systems are being used to monitor employees, equipment use must stop and the equipment must be moved and stored away from where employees are being monitored by a safety monitor. The rule prohibits using mechanical equipment during roofing activities on low-slope roofs where only a safety monitor is used.

- Keep all employees who are not engaged in roofing work away from areas where an employee is being monitored by a safety monitor.