

Bradbury Stamm Construction – Safety Directive

Safety Directive # 018-08

Original Issue Date: 01/15/2007

Revision Date: 11/01/2022

SCAFFOLD PLATFORM ACCESS

Purpose

1. This directive is intended to prevent exposure to falls from elevation when employees move between scaffold platforms (walking/working surfaces) and fixed scaffold ladders.
2. Maintain compliance with OSHA regulations.

Hazard

Employees accessing scaffolds platforms from ladders are exposed to falls when crossing over, under or through cross braces and guardrails. Employees may have tools, tool belts or clothing catch causing them to lose their balance and/or grip and fall. Employees must be able to step from the ladder to the scaffold or from the scaffold to the ladder without trip hazards or obstructions.

Ladders fixed to scaffolds should be located where employees can make this unimpeded transition. Typically, ladders are located at the end of walkthrough frames. To avoid exposure to falls at the end of the frames, the ladder access will close by swing gates, chains or other device in compliance with OSHA's Subpart L - Scaffolds and Subpart M-Fall Protection guardrail system specifications. *See note below.*

Policy

1. **All ladder-to-scaffold access points will be free of fixed cross braces and fixed guardrails.**
2. **All openings in the scaffold's guardrail system will be equipped with a swing gate or other movable device to allow unobstructed movement from the ladder to the scaffold platform and from the scaffold platform to the ladder.**

Note: Although NM OHSB and the Scaffold Training Institute allow passing through cross braces and guardrails, by doing so employees are exposed to falls. OSHA has two interpretations in response to employers' letters concerning first, climbing through cross braces and guardrails and second, openings in the guardrail system.

In the first interpretation dated 2000, OSHA acknowledges climbing through, over, or under cross braces and/or guardrails is not specifically prohibited by Subpart L – Scaffolds. OSHA does state that if employees are exposed to hazard not covered by Subpart L it may issue General Duty Clause citations.

In the second interpretation, OSHA upholds the continuity of the guardrail system thus mandating "swing gates or similar devices." In this interpretation OSHA also warns that the toe board is part of the guardrail system and if objects on the platform can become falling objects then a movable toe board must be installed with guardrail system.