

HEALTH AND SAFETY ADVISORY

Working at Heights—Site-Specific Training

Falling from heights continues to be a leading cause of injuries and fatalities in the Ontario construction industry. Despite the fact that working at heights (WAH) training is mandatory and must meet a provincial standard, workers are still dying or suffering life-altering injuries.

All Ontario workers on a construction project who may use a method of fall protection to protect themselves from a fall hazard must receive WAH training that has been approved by the Chief Prevention Officer (CPO) of Ontario. In addition, a WAH refresher course must be taken every three years. However, an important part of WAH training that is often overlooked is the requirement for the employer to provide **site-specific WAH training**.

CPO-approved WAH training is only the first step. Knowing the specific fall hazards on site and how to protect against those hazards is the key to keeping workers safe and reducing the number of fall-related incidents.

Legal Requirements

According to the Construction Projects regulation (213/91):

*26.2 (1) An employer shall ensure that a worker who may use a fall protection system is adequately trained in its use and given **adequate oral and written instructions by a competent person.***

*(1.1) In addition to the requirements of subsection (1), an employer shall ensure that a worker who may use a fall protection system meets **the working at heights training requirements** of Ontario Regulation 297/13 (Occupational Health and Safety Awareness and Training).*

(For the definition of a competent person, refer to the *Occupational Health and Safety Act*.)



Site-Specific WAH Training

Adequate oral and written instructions given to a worker should include:

- Informing them about the actual fall hazards they may be exposed to on the jobsite
- Reviewing the procedures for protecting themselves against these fall hazards
- Training them on the particular equipment they will be using on the site.

These instructions should be a part of the employer's site-specific training. Training can also include providing instruction to the worker on such things as:

- How to inspect anchors systems and other system components
- How to use the equipment that is connecting the system together
- How to understand the limitations of the equipment and calculate fall distance
- How to respond to an emergency situation if a fall were to occur (i.e., on-site rescue procedures).

A Ministry of Labour (MOL) inspector can ask for written proof of WAH training (O. Reg. 213/91, s. 26.2(4)). This not only includes a valid WAH training certificate but also site-specific training information such as the date it was given, what was addressed (e.g., Were written instructions provided? Was training given on the specific systems being used?), the name of the worker(s) who received the training, and the name of the competent person who provided the training.

Developing Site-Specific WAH Training

Below are some suggestions for developing effective site-specific WAH training.

1. Conduct a hazard assessment of the site.

An assessment will show what the hazards are, where they are located, and where fall protection is required. IHSA recommends that each site also have a customized **Fall Protection Work Plan**.

If your company doesn't have a hazard assessment form or a work plan, you can download one by visiting the **Fall Prevention and Working at Heights** topic page on the ihsa.ca website.

2. Put controls in place to eliminate or reduce the likelihood of a fall.

Find the solutions to prevent any fall-related hazards found during the hazard assessment. Solutions could include eliminating the hazard by putting up guardrails or controlling the hazard by finding appropriate anchor locations and figuring out what type of fall protection equipment is needed.

Use a JSA or **Job Safety Analysis Form**, which is also available on the ihsa.ca website, to help with this. These solutions should be included in your Fall Protection Work Plan.

3. Develop a fall rescue plan.

Before any worker uses a fall arrest system on a project, the employer is legally required to develop written procedures for rescuing someone whose fall has been arrested. Having a good rescue plan in place and making sure everyone knows what to do in case of an emergency can save a life.

A sample fall rescue plan is available to download from ihsa.ca and can be customized to fit your needs.

4. Write it down.

Keep a record of all site-specific WAH training done at the site. Include details such as who the trainer was, who was trained, what was discussed, etc. That way, if an inspector comes to your site and asks for this information, you will be able to provide it.

IHSA recommends that supervisors keep a log book to record everything that happens at a jobsite in case questions such as these come up.

Remember: It's important that everyone understands and follows the Fall Protection Work Plan and fall rescue procedures. Make sure they're posted in a conspicuous place at the project where workers can see them.

How IHSA Can Help

IHSA has developed a **Falls Kit**, which contains some of the resources needed to develop site-specific WAH training. To get a free kit sent to you, email douyourpart@ihsa.ca or download the resources from the **Fall Prevention** topic page.

Our **Policy and Program Templates** section of the website also contains helpful resources such as hazard assessment forms and jobsite inspection checklists.



A publication of the Provincial Labour-Management Health and Safety Committee in partnership with the Infrastructure Health & Safety Association

June 2018