


<h1>Project Navigator</h1>				Guideline			
TITLE WORKING AT HEIGHTS RISK ASSESSMENT				VALE # NAV-GP-0294		PAGE 1/4	
				DM # 1031780		REV. 3	
Effective Date:	Mar 27/15	Revisit Date:	Feb 2017	Prepared By:	T. Pinkerton.	Approved By:	T.Hirschfeld

1.0 PURPOSE

This guideline is intended to assist ERM project teams in completing a Working at Heights Risk Assessment, with the goal of reducing risk on their projects.

2.0 REFERENCE DOCUMENTATION

The following documents were used in the development of this document or are related to it. The most recent revision shall be used.

Link	Working at Heights Risk Assessment Questions
NAV-TP-0019	Process Hazard Review (PHR) Template
NAV-TP-0161	Contractor Training Requirements Template
Link	MOL Working at Heights Program Standard
Link	MOL Working at Heights Provider Standard
Link	MOL Approved Providers for Working at Heights Training
	Ontario Regulation 213/91 s. 26

3.0 APPLICATION

2015 – as part of ensuring compliance to the new Working At Heights Training Requirements effective April 1, 2015, Working At Heights Risk Assessments are to be conducted for all Registered Construction Projects. Construction Coordinators are to conduct the risk assessments for all Construction work. Others are to conduct this risk assessment, where applicable, for Commissioning or other project fieldwork.


2016 and later – this will be an optional process at the discretion of the Project Manager, but recommended as a means of reducing project risk.

4.0 CONTEXT

4.1 WORKING AT HEIGHTS TRAINING REQUIREMENTS

The Ontario Ministry of Labour (MOL) has announced changes to Regulation 297/13: Occupational Health and Safety Awareness and Training effective April 1, 2015. Workers that will work at heights on construction project sites must complete a Working At Heights training program that has been approved by the MOL (Chief Prevention Officer). (See Reg. 297/13 section 6 for more information.) Training certificates will be valid for three years from the date of completion.

Anyone exposed to fall hazards on the job as per Construction Regulation (213/91) section 26.2 requires fall protection training. Workers who have already received

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training that meets the existing requirements of section 26.2 has two years (until April 1, 2017) to complete an approved Working At Heights training program.

In 2013, the Prevention Office released a [Working at Heights Training Program Standard](#) and a [Working at Heights Training Provider Standard](#). These standards specify the minimum learning outcomes for Working At Heights training programs and the requirements for approved training providers.

Employers have a legal duty to ensure workers are properly trained. When Vale is the Constructor on a registered Project, the project personnel are also accountable to ensure this is done.

5.0 CONDUCTING A WORKING AT HEIGHTS RISK ASSESSMENT

Part one of this Risk Assessment includes a review of construction tasks to identify tasks requiring work at heights. Those tasks are to be reviewed to identify the mitigation strategy(ies) and the associated element(s) from the hierarchy of control. The current PHR Template will be used for conducting these risk assessments.

Part two of this Risk Assessment includes an audit of the Working at Heights training records for all workers that will be working at heights to ensure that all training:


- If received after April 1, 2015 has been done by an MOL approved provider
- If received prior to April 1, 2015 that the training provided meets the intent of the current O.Reg 213/91 s26.

5.1 PROCESS

5.1.1 Part One – Risk Assessment

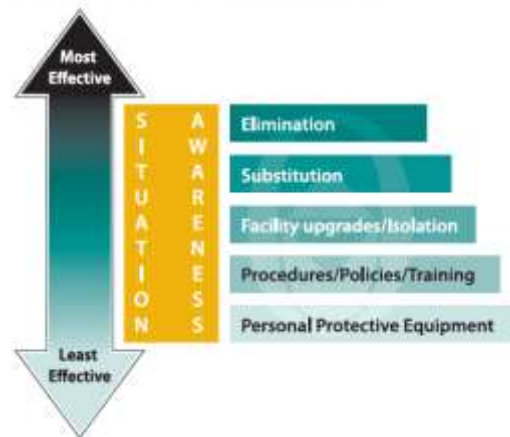
If a PHR has already been completed for the work being assessed and there is a completed work methodology, that PHR document should be reviewed and revised as follows:

- The “Working at Heights Risk Assessment Questions” document will assist in identifying any missing’s in an existing PHR or will assist in identifying Working at Height tasks and controls to mitigate the hazard.
- A field review of the jobsite may reveal additional Working at Height hazards that require mitigation. The Risk Assessment questions document should be reviewed prior to conducting this field walk-about.
- Review all tasks on the PHR Methodology and add “WAH” at the beginning of all tasks that are associated with working at heights.

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- Add any new tasks that relate to working at heights that may have been “missed” during the initial development of the PHR Methodology and add “WAH” to the beginning of that task description.
- For each WAH task identified on the PHR Methodology add a line(s) at the bottom of the PHR Minutes tab completing all of the required columns.
- Identify which hierarchy of control will be used in either the “Existing protection” or “Recommendation” column for each WAH task.

Hierarchy of Controls




Note: for work where a PHR has not yet been completed or another risk tool was used, use the PHR Template and ensure that the Methodology tasks are identified with “WAH” at the beginning of the task description and that the Minutes include which hierarchy of control will be used to mitigate the working at heights hazard(s).

Note: these Risk Assessments can be done independently or in conjunction with some or all of the original PHR Attendees.
It is not mandatory to re-convene the entire PHR team, or to re-do the entire PHR.

5.1.2 Part Two – Training Record Audit

For each Registered Construction Project the Vale Representative shall request from the Contracting Party an updated training matrix, which will include the name of the Working at Heights Training Provider used (e.g. NORCAT, Soucie Salo, etc...). If no training matrix has been provided at the time of this audit the Construction Coordinator shall request the Contracting Company to complete the “Contractor Training Requirements Summary Template (NAV-TP-10161)” which includes a line for identifying the Working at Heights Training Provider used.

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The training record audit must also include verification of all Working at Height Training certificates / wallet cards for all workers on site at the time of the audit. (If additional workers are assigned to the site later, confirm that their training also meets the requirements.)

If the Training was received prior to April 1, 2015 and the Provider Course has been identified on the “OCS Working at Heights Program Standards & Provider Standards Survey Matrix” as “likely not acceptable” this training record will not be accepted. If the Training Provider does not appear on the OCS list, a “high level” review of this Training Providers Program must be done to determine if that Program was “likely” to meet the intent of the current training requirements in O.Reg 213/91 s26.6. (Consult the Project Manager for assistance as required). If the Training was received after April 1, 2015 the Training Provider name must appear on the [MOL Approved Providers Training list](#).

6.0 APPENDICES

Appendix A: Revision and Transition Notes

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Revision notes describe: what was changed, why it was changed, and the plan to implement the change, including whether changes are retroactive)

Revision Control Information

Rev #	Date	Nature of Change	Page inserted, replaced, revised or cancelled	Approved by document owner
1	Mar 27/15		Development	T.Hirschfeld
2	Feb 8/17	Update	Removed section 4.2 “Safety Plant Tracker Requirements” as no longer applicable	T. Hirschfeld
3	May 6/18	Minor	Aligned terminology from PMO to ERM	