

Title: **Working at Heights**

Adopted: June 27, 1995

Effective: June 27, 1995

Amended/Reviewed: June 2, 2026

This procedure must be interpreted, applied, and implemented in ways that uphold Indigenous and human rights and responsibilities, promote accessibility, and prevent and address (and do not reinforce) discrimination/discriminatory barriers.

1.0 RATIONALE

This Procedure outlines training and safety requirements for any employees, contractors and/or students working at heights.

This procedure complies with applicable Legislation and Standards including:

- Ontario Regulation 213/91: Construction Projects, Sections 26 and 207
- Ontario Regulation 851/90: Industrial Establishments, Sections 85 and 86
- Ontario Reg 297/13 Occupational Health and Safety Awareness and Training 2.0

2.0 DEFINITIONS

2.1 Working at Heights: Persons engaged in work or activities which exposes them to falling from heights of 3 metres or more. The 3-metre level is measured from the person's feet to the surface below. Examples include, but not limited to, working on a roof (within 2 metres from the edge without fall prevention measures), scaffold, aerial platform or extension ladder.

2.2 Fall Prevention: The means, methods and devices to keep workers from being exposed to fall hazards such handrails, guardrails, barriers and travel restraint systems.

2.3 Fall Protection: A method, such as safety devices, used to minimize the risk of falling when it is not possible to use fall prevention methods and can include a fall arrest (e.g. harness), fall restriction (e.g. lanyard), or safety net.

2.4 Working at Heights Training: Mandatory training for those required to use a method of fall protection to protect themselves from a fall hazard. The Working at Heights Training must be delivered by a training provider who has been approved by the Ministry of Labour, Immigration, Training and Skills Development's (MLITSD) Chief Prevention Officer (CPO).

- 2.5 Rescue Plan:** A plan outlining procedures to safely and rapidly retrieve a worker suspended in a fall arrest system or stranded at an elevated position.
- 2.6 Fall Hazard Awareness Training:** Hazard-specific training focused on Ladder and Roof Access Safety for applicable DDSB employees.
- 2.7 Elevated Work Platform:** Hydraulic or electrical controlled devices used to elevate personnel or materials.
- 2.8 Scaffold:** A scaffold is a temporary fixed or movable platform for individuals to stand or sit on when working above the ground or floor level.
- 2.9 Step Ladder:** A step ladder is a self-supporting portable ladder made from aluminum or fiberglass in 1.82 meters (6 feet), 2.43 meters (8 feet) and 3.04 meters (10 feet) lengths.

3.0 RESPONSIBILITY

3.1 Health and Safety

The Health and Safety Department will coordinate Working at Heights training for all Board employees required to work at heights where fall protection requirements apply. When applicable, the training will also include equipment specific instruction (e.g. Elevated Work Platform).

The Health and Safety Department is responsible for the development and maintenance of the Ladder and Roof Access Safety training program delivered to applicable DDSB employees.

The Health and Safety Department will coordinate an annual certified inspection of lift equipment (as per O. Reg. 851/90) and annual inspections on fall protection equipment for working at heights (e.g. harnesses, lanyards).

The Health and Safety Department will manage all records related to the Working at Heights activities (e.g. employee training and inspections records) in accordance with the Board's Records and Information (RIM) Procedure and the Records Retention and Classification Schedule (RRCS).

3.2 Manager of Maintenance

Manager of Maintenance (or delegate) will ensure an inventory of all working at heights lift equipment is maintained.

Manager of Maintenance (or delegate) will coordinate and budget all required repairs to lift equipment.

Manager of Maintenance (or delegate) will ensure that all lifts stored at Maintenance are properly charged and ready to be deployed and visually inspected upon return.

3.3 Facilities Services Supervisor

Facilities Services Supervisors (Custodial and Maintenance) are responsible for identifying staff who require Working at Heights training.

Facilities Services Supervisors must ensure that employees do not perform any work at heights unless their Working at Heights training under O. Reg. 297/13 is current, and they have been properly instructed and trained on the specific equipment being used (e.g., elevated work platforms).

Facilities Services Supervisors are responsible for ensuring applicable staff complete DDSB fall hazard awareness training (Ladder Safety and Roof Access Safety).

The Facilities Services Supervisors are responsible for communicating the requirements of this Procedure to contractors assigned to perform work.

3.4 Custodian:

The Custodian is responsible for completing training as required. The custodian is also responsible for ensuring that only staff who have successfully completed WAH training engage in activities requiring such training.

The Custodian or trained custodian is responsible for visually inspecting the ladder, elevated work platform and fall protection equipment prior to use and reporting any defect or damage directly to supervisor.

The Custodian at a school equipped with its own working at heights elevated work platform is responsible for ensuring the equipment is properly charged and ready to be used and visually inspected after use.

3.5 Maintenance Employees

Maintenance staff are responsible for completing training as required.

Maintenance is responsible for visually inspecting the ladder, elevated work platform and fall protection equipment prior to use and reporting any defect or damage directly to supervisor.

3.6 School Administrator and Curriculum Teacher

There may be a small number of secondary teaching staff and students that require Working at Heights training. The School Administrator in consultation with curriculum teacher must always consider safer alternatives to working at heights and can consult with Health and Safety for advice.

School Administrators and curriculum teacher must ensure that all secondary students working at heights have completed Working at Heights training and have received specific instruction on the equipment that is to be utilized and work under

the direct supervision of the trained teacher.

It is the responsibility of staff who have Working at Heights training and are supervising students who have Working at Height training to complete the equipment inspection prior to use. Any defect or damage to equipment including ladders, elevated work platforms, harnesses, lanyards, and anchors must be taken out of service and reported to the School Administrator. The School Administrator will notify the Health and Safety Department.

School Administrator and the Curriculum Teacher will manage all school records related to the Working at Heights activities (e.g. teaching staff and student training) in accordance with the Board's Records and Information (RIM) Procedure and the Records Retention and Classification Schedule (RRCS).

3.7 Information Technology Services Manager

Information Technology Services Managers are responsible for ensuring applicable staff complete DDSB fall hazard awareness training (Ladder Safety and Roof Access Safety). Information Technology Managers can request training records annually through the Health and Safety department.

3.8 Purchasing Department

The Purchasing Department will maintain a list of Working at Heights training providers.

4.0 APPLICATION AND SCOPE

The Working at Heights Procedure will be followed by all Durham District School Board employees, students, and/or contractors.

No person, worker or student is permitted to be working at heights, unless they have a record of training under O. Reg 297/13 and have received instruction and training on the equipment being utilized.

No elementary students shall be allowed to work at heights.

5.0 PROCEDURES

5.1 General Working at Heights Procedure

5.1.1 Preparing for Working at Heights

It is the responsibility of all Facilities Services Supervisors (Custodial and Maintenance) or School Administrators to identify staff or students who require Working at Heights Training.

Facilities Services Supervisors or School Administrators must contact the Health and

Safety Department to coordinate Working at Heights training and specific equipment training prior to staff and/or secondary students utilizing the equipment.

Facilities Services Supervisors or School Administrators must ensure that all staff and secondary students working at heights have completed the Working at Heights program and have received specific instruction on the equipment that is to be utilized.

5.1.2 Access to Equipment

Elevated work platforms, when not in use, shall be secured from unauthorized use. This can include a locking device or key/power pack control and/or securing in a location with controlled access by the Lead Custodian.

5.1.3 Transportation of Elevated Work Platforms

Transporting elevated work platforms can expose personnel to safety hazards and may also result in equipment damage, which can create additional safety risks.

Personnel transporting and lifting elevated work platforms shall comply fully with the Transport and Lifting Instructions in the Operator's Manual for the unit. This includes both DDSB staff and external cartage companies.

5.1.4 Roof Access

Roofs may only be accessed by authorized workers. This includes Facility Services staff who have completed the DDSB Roof Safety training, authorized constructors/contractors/subcontractors, and regulatory and law enforcement agencies.

Accessing the roof of a building should be limited to work related duties such as inspection of roof drains, maintenance of roof top units and/or removing debris.

Roof access requires pre-planning:

- Notifying Administrative / Custodial staff of access/purpose/duration
- Timing (e.g. daylight hours)
- Weather conditions
- Roof surface conditions (e.g. icy/slippery)
- Communication (e.g. two-way radios)

Roof work within 2 metres of an unprotected roof edge requires additional safety measures. These include, but are not limited to, guardrails, long reach tools (e.g. grabbers), or travel restraints and fall arrest equipment. When performing a task that is within 2 metres, DDSB staff must first discuss the work with their supervisor for further direction (e.g. additional tools, fall arrest equipment, Working at Heights training).

5.1.5 Ladder Use

Step ladders (6ft, 8ft, and 10ft) are restricted to Facility Services and IT staff who have completed the Ladder Safety training. Other Board staff who may require ladder use based on Curriculum needs (e.g. technology and theatre) must contact Health and Safety for approval and training. Non-board ladders may not be used by staff or volunteers at any time.

All step ladders used must be Board approved, Grade 1 or Grade 1A and CSA certified.

School staff are permitted to use Board approved 2-step ladders. As a best practice, schools should have Board approved two-step ladders readily available and accessible for staff use.

School staff and volunteers requiring access to heights beyond the Board approved 2-step ladder shall communicate the need to the school Custodian for assistance.

5.1.6 Contractors

Contractors are not permitted to use DDSB ladders, elevated work platforms, and associated safety equipment.

Contractors must comply with all applicable requirements under the Occupational Health and Safety Act, including valid Working at Heights training, when applicable.

5.1.7 Scaffolds

Only trained and authorized DDSB Maintenance staff are permitted to use scaffolds. Maintenance Supervisors will ensure that the applicable staff have the required training.

5.1.8 Rescue Plan

A rescue plan is mandatory whenever a fall arrest system (e.g., harness) is used.

When a worker falls and is suspended in a harness, quick rescue is important. In addition to potential injuries, prolonged suspension may lead to suspension trauma (pooling blood in lower body).

A rescue plan will include, but not limited to, stand-by person, communications/back up communications and emergency access to the work site.

5.1.9 Records Management

All records related to equipment inspections shall be managed by Health and Safety in accordance with the Board's Record and Information Management (RIM) and the Record Retention and Classification Schedule (RRCS).

All records related to training shall be managed by Health and Safety or School Administrator (as applicable) in accordance with the Board's Record and Information

Management (RIM) and the Record Retention and Classification Schedule (RRCS).

6.0 REFERENCE DOCUMENTS

- *Occupational Health and Safety Act*, RSO 1990, c O.1, as amended by SO 2025, c 13, Sched 4.
 - Ontario Regulation 213/91: Construction Projects, Sections 26 and 207
 - Ontario Regulation 851/90: Industrial Establishments, Sections 85 and 86
 - Ontario Reg 297/13 Occupational Health and Safety Awareness and Training (Working at Heights Training — Construction Projects under O. Reg 213/91 Construction Projects)
- CSA Z11-18 (R2022) - Portable Ladders