

Working at Heights Training Standards Five-Year Review

Consultation Paper

Context & Objectives

This consultation is part of a commitment made by Ontario's Chief Prevention Officer (CPO) to review the Working at Heights training program and provider standards every five years. The intent of the review is to ensure the CPO's Working at Heights training standards remain effective, and will allow the continued delivery of high-quality working at heights training that saves lives.

The continued effectiveness of the Working at Heights standards is important. Falls from heights are the number one cause of fatalities in construction, and the third most common cause of lost-time injuries. These falls from heights in construction are preventable and working at heights training is one method to help eliminate them.

This consultation is designed to solicit feedback from workers, employers, learners, training providers, and other interested parties that interact with the standards. The feedback will help to keep the standards relevant and properly reflective of the hazards associated with working at heights, and to better understand how new teaching aids and technology may be incorporated in the standards. The consultation will also seek feedback on working at heights or fall protection training in other provinces.

Submissions in response to the consultation questions are requested by March 11, 2021 online or by email. Please submit your written feedback through PreventionFeedback@Ontario.ca with the subject line: **WAH Standards Review**.

Background:

Sections 7.1 through 7.4 of the *Occupational Health and Safety Act* (OHSA) give the CPO the authority to establish standards for training programs required under the OHSA and its regulations, and to approve training programs which meet those standards. The CPO also has the authority to establish standards that must be met in order to become an approved training provider for an approved training program, and to approve training providers under those standards.

The CPO has established two standards relating to working at heights in Ontario. They are:

- [The Working at Heights Training Program Standard](#)
- [The Working at Heights Training Provider Standard](#)

Generally, workers who are required to use specific fall protection equipment on construction projects in Ontario must complete a Working at Heights training program approved by the CPO and delivered by a CPO-approved training provider. These requirements are set out in the Occupational Health and Safety Awareness and Training Regulation (O. Reg. 297/13), made under the OHSA.

Since 2015, the CPO has approved 224 Working at Heights training providers and 240 Working at Heights training programs. The CPO's Working at Heights training program has resulted in over 805,000 learners. An additional 152,000 learners have completed the Working at Heights refresher training program.

Instructions

The consultation questions that follow may require reference to the Working at Heights program and provider standards, including relevant glossaries that are contained in the standards. The standards can be found on the Ministry of Labour, Training and Skills Development's website. Links to the standards online are provided in the Background section of this paper.

All feedback provided by respondents will be reviewed and considered by the ministry.

The questions are divided into five sections:

Section 1: Respondent information (optional)

Section 2: Questions relating to the Working at Heights training program standard

Section 3: Questions relating to the Working at Heights training provider standard

Section 4: Broad questions regarding the Working at Heights training program

Section 5: Fall protection training across Canada, and promoting greater labour mobility

Questions:

Section 1: Respondent information (optional)

Name:

Role/Occupation:

Name of organization that you work for or represent:

Industry or sector that you work in or represent:

Section 2: Questions relating to the Working at Heights training program standard:

1. When eLearning is combined with face-to-face training, the result is referred to as blended learning. What opportunities are there for greater use of eLearning in the standard? Currently, eLearning is only allowed for the theory module of the training, not the practical module.
2. Currently, the theory module of the training must be delivered prior to the practical module, i.e., before any practical (hands-on) learning outcomes can be introduced. How could the training requirements in the program standard be changed so that

there is greater flexibility in the order that the theory and practical learning outcomes are delivered? Please explain.

3. Working at Heights training has a minimum required training duration of 6.5 hours and the refresher training program has a minimum required training duration of 3.5 hours. Are these minimum training durations appropriate to deliver the required learning outcomes? Please explain.
4. The maximum learner to instructor ratio for theory module is 24:1 and for the practical module is 12:1. Are the current ratios appropriate? If not, please explain.
5. The equipment to learner ratio is 1:3 and the damaged equipment to learner ratio is 1:12. Are the current ratios appropriate? If not, please explain.
6. What pieces of equipment could be added or removed from the equipment list in section 8 of the standard to reflect technological change or industry needs and best practices?
7. The Working at Heights training program standard requires that learners meet specific learning outcomes to successfully complete training. What changes should be made to the learning outcomes to ensure the program is relevant and effective? Please explain if there are any learning outcomes you believe should be:
 - a. revised;
 - b. added (e.g., practical ladder training, skylight safety); or
 - c. removed (e.g., duplicative learning outcomes or overlapping training requirements).
8. How could learner evaluation in the training program standard be enhanced (e.g., updated terminology, new technology and/or modern learning approaches)? Please explain.
9. Workers are required to refresh their training every three years in order to maintain its validity. Do you have any suggestions for changes regarding the validity of the training and the need to complete refresher training? Please explain.
10. Should workers be required to retake the full Working at Heights training program (6.5 hours) if they do not refresh within a specified amount of time since the last training was successfully completed? Please explain.

Section 3: Questions relating to the CPO's Working at Heights training provider standard:

1. What changes should be made to clarify expectations for training providers (e.g., required course materials, equipment, etc.)?
2. What modifications, if any, should be made to the qualification criteria for instructors to enhance program delivery? Please explain.
3. What, if anything, should be added to, removed from or revised in the current code of ethics?

4. Are there other reporting requirements for training providers, besides the current annual reporting requirement, that should be considered to support consistent, high quality training? Please explain.
5. What additional changes should be considered to strengthen the requirements to create a positive learning environment (e.g., anti-racism, anti-harassment requirements, etc.)?

Section 4: General questions relating to the Working at Heights training program:

1. How suitable are learning outcomes contained in the training program standard for use in other workplaces or sectors outside of construction? Please explain which workplaces or sectors and why or why not.
2. What additional data related to training programs should be collected and shared to improve our understanding of the impact of WAH training on health and safety outcomes in Ontario (e.g., WAH training failure rates, worker occupation, etc.)?
3. What barriers, if any, do you face when completing or delivering training (e.g. access to information, geographic location, issues related to race, language, and culture, etc.)?

Section 5: Fall protecting training across Canada, and exploring greater labour mobility:

Labour mobility has become a priority for all Canadian jurisdictions, including Ontario, under the Canadian Free Trade Agreement (CFTA). One method to facilitate labour mobility could be recognizing training or qualifications across provinces and territories.

1. If you have had experience with working at heights or fall protection training in other provinces or territories, how does that training compare to the CPO approved Working at Heights training? Please describe the training and explain how it compares to Ontario's training.
2. Would you support recognition of working at heights or fall protection training completed by workers from other provinces or territories? Any jurisdiction in particular? Why or why not?

Comments Due Date

March 11, 2021

Email

PreventionFeedback@Ontario.ca

Address

Working at Heights Standards Review

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Notice to Consultation Participants

Submissions and comments provided to the Ministry of Labour, Training and Skills Development (the Ministry) are part of a public consultation process to solicit views on the Working at Heights training program and provider standards. This process may involve the Ministry publishing or posting to the internet your submissions, comments, or summaries of them. In addition, the Ministry may also disclose your submissions, comments, or summaries of them, to other parties during and after the consultation period.

Therefore, you should not include the names of other parties (such as the names of employers or other employees) or any other information by which other parties could be identified in your submission.

Further, if you, as an individual, do not want your identity to be made public, you should not include your name or any other information by which you could be identified in the main body of the submission. If you do provide any information which could disclose your identity in the body of the submission, this information may be released with published material or made available to the public. However, your name and contact information provided outside of the body of the submission (such as that which may be found in a cover letter, on the outside of an envelope, or in the header or signature of an email) will not be disclosed by the Ministry unless required by law. An individual who provides a submission or comments and indicates a professional affiliation with an organization will be considered a representative of that organization and his or her identity in their professional capacity as the organization's representative may be disclosed.

Personal information collected during this consultation is under the authority of sections 7.1 and 7.2 of the *Occupational Health and Safety Act* and is in compliance with subsection 38(2) of the *Freedom of Information and Protection of Privacy Act*.

If you have any questions regarding the collection of personal information as a result of this consultation, you may contact the Ministry's Freedom of Information Office, 400 University Avenue, 10th Floor, Toronto, Ontario, M7A 1T7, or by calling 416-326-7786.