



Ontario Association of Architects

INFORMATION BULLETIN

Basic Site Safety for Architects and Their Staff

Safety on Construction Sites

With the change from fall prevention training, to the mandatory “Working At Heights” training, the provincial government has raised the bar for everyone going onto a construction site including architects and their staff. As a result of the focus of the Ministry of Labour on site safety and the potentially heavy fines for non-compliance with the Occupational Health and Safety Act (OHSA), contractors are concerned about their liabilities.

Since contractors are typically responsible for site safety, they may require more than the legislated minimum training. It certainly simplifies their administration of site safety if everyone has the same training. Some are requiring Working At Heights training for all visitors to all their construction sites even where there is not a danger of falling 3 metres and Working At Heights training is not required by law.

Architects should ensure that they and their staff who may visit construction sites are appropriately trained.

With Working At Height’s emphasis on life lines, lanyards, rope grabs and harnesses, the information relating to other aspects of general site safety may be overshadowed. In addition, architects may want to inform staff of their own policies and procedures its staff are required to follow when representing the practice on site. To emphasize general site safety and educate staff about policies and procedures, architects may want to provide documentation to or training for staff in addition to Working At Heights training. Any such additional safety related efforts should be logged and completion dates noted. These records should be retained to show what the practice has done.

Remember, it is not just the architect/owner of a practice who is liable, but any staff member who supervises the work of others. The penalty for every person who contravenes or fails to comply with a provision of the OHSA or the regulations may face a fine of up to \$25,000 or to imprisonment for up to two years or both. If your practice is a corporation, you may face a fine of up to \$500,000.

Compared to the possible penalties, the cost of safety training is inexpensive.

Responsibility of Architect as Employer

Even where a contractor may not require Working At Heights training because there is no danger of falling (such as many interior renovations) or where a building condition assessment

is being done prior to there being any construction project, the architect as employer is required to provide appropriate safety equipment and training.

Prior to the introduction of Working At Heights as the mandated training, many practices used (and contractors recognized) the “Basics of Fall Protection” course that was available from the Infrastructure Health and Safety Association. It provided a good overview of fall prevention, addressing the issues of ladders, scaffolds, powered elevating work platforms, protective covers, warning barriers, bump lines, guardrails, and travel-restraint systems separate from fall arrest systems. While this is no longer acceptable as minimum training, the topics are still relevant to site safety.

Other topics that practices may want to address include personal protective equipment (use, care and replacement) , reporting of unsafe site conditions, site awareness, danger from falling objects, use of telephoto lenses to avoid dangerous locations, and other such concerns.

Some Additional Requirements of the Occupational Health and Safety Act

Architects as employers should be aware of the requirements of OHSA as it applies to all employers. For instance, Part II 8.(1) requires a workplace where the number of workers regularly exceeds 5 to have a health and safety representative. Part II 9.(2)(a) requires a workplace where 20 or more workers are regularly employed to have a joint health and safety committee.

Part III sets out the duties of employers and other persons including supervisors, workers and owners (of workplaces that are not projects, such as architects who own the building the practice is housed in). It is here that the requirements to provide personal protective equipment and training are stated.

Part IX sets out the penalties for contravention of the Act.