



ADMINISTRATIVE PROCEDURES

SUBJECT: Safe Roof Access

The Lambton Kent District School Board is committed to the protection of its employees from workplace injury and recognizes that workers are potentially exposed to the hazard of falling more than three (3) meters when accessing roofs. This procedure has been developed to outline the Board's procedures and ongoing facility improvements for minimizing the risk of falls associated with roof access. Only Board authorized persons may access the roofs.

General Responsibilities:

The Lambton Kent District School Board is responsible to ensure this Safe Roof Access administrative procedure is implemented so that safe procedures and equipment are provided for staff members who access roofs of Board owned facilities. The Board is responsible to take every precaution reasonable in the circumstances to protect staff from hazards associated with roof access.

Supervisors/School Principals are responsible to ensure this administrative procedure is implemented as it relates to their staff. Take every precaution reasonable in the circumstances to protect their staff.

All staff is required to comply with the Occupational Health and Safety Act and the Board's policies and administrative procedures. Staff members are required to report defective equipment and all other health and safety concerns to their Supervisor/School Principal.

Equipment Standards / Inventory / Maintenance:

1. The Health and Safety Officer is responsible to co-ordinate an annual, formal, comprehensive visual and physical safety inspection of all fixed vertical access ladders and fixed vertical ladders, roof access hatches including grab rails, guardrails on roofs including around roof hatches, and permanent roof anchors, located at all of the Lambton Kent District School Board facilities to ensure compliance with Ontario Ministry of Labour, Immigration, Training and Skills Development and Ontario Building Code where applicable. The inspection must include an inventory and the labeling of the equipment with unique identification numbers.
2. The Supervisor of Maintenance is responsible to co-ordinate repairs to address deficiencies identified in the inspection reports.

3. The Supervisor of Maintenance and Coordinator of Sites and Design are responsible to ensure all new equipment meets and are installed according to applicable regulations, codes and standards; also, to ensure design and installation documentation is maintained.
4. The Supervisor of Maintenance and Coordinator of Sites and Design are responsible to inform the Health and Safety Officer whenever equipment is installed or removed.
5. The Health & Safety Officer is responsible to arrange a third-party inspection for all new equipment. Supervisor of Maintenance and/or Coordinator of Sites and Design is responsible to ensure the equipment is tagged “Do Not Use” so that it is not used until it has passed the third-party inspection.
6. The Supervisor of Maintenance is responsible to maintain posted signs at all points of roof access indicating entry being restricted to authorized personnel only.
7. Custodian and Trades staffs are responsible to submit a work order if a sign required at an entry point is missing or illegible.
8. The Manager of Facility Maintenance & Capital is responsible to incorporate roof access safety improvements in the annualized Capital planning.
9. The Manager of Facility Operations is responsible to provide a summary of information to be used in the planning for roof access safety improvements. The information should include site-based staff recommendations for improvements.
10. The Health & Safety Department is responsible to provide information such as annual inventory and inspection reports and relevant potential incident reports to be used in the planning for roof access safety improvements.
11. The Manager of Facility Maintenance & Capital is responsible to maintain current roof safety equipment drawings.

Authorization and Training:

Only authorized persons shall access the roofs. No other persons shall access the roofs.

- 1) The following employee groups may be authorized to access the roofs: NOTE: staff training must be successfully completed prior to staff accessing any roof.
 - Custodians
 - Trades and Utility staff
 - Sites and Design staff
 - Health & Safety Department Staff
 - Facility Maintenance and Facility Operations Management staff
 - Principals and Vice Principals

- 2) In addition, the following external parties may access the roofs:
 - Consultants, constructors, contractors, subcontractors approved through the Board's Contracted Services Program
 - Regulatory and law enforcement agencies such as Ministry of Labour, Immigration, Training and Skills Development, TSSA, and Police and Fire Services.
- 3) All authorized persons planning to access a roof during school hours are responsible to notify the school office. Contractors must also notify their Board contact prior to accessing a roof.
- 4) Supervisors/School Principals are responsible to restrict roof access to Board authorized persons only.
- 5) Custodian, Trades, and Utility staffs are responsible to carry a cell phone, programed with the school office and supervisor's numbers.
- 6) Custodian, Trades, and Utility staff are responsible to obtain written authorization prior to accessing a roof. This could be a work order, a PM, or an email/text message from the immediate supervisor.
- 7) Authorized contractors may access roofs during construction projects which typically occur during school breaks.
- 8) Trades staff and Authorized Contractors may access roofs outside of regular school hours for emergency purposes. If work is during the afternoon shift, they are responsible to sign in and out and notify the custodial staff on duty when they are arriving and when they are leaving.
- 9) When a trade or utility staff member will work alone as described in the Board's Working Alone Administrative procedure, the Supervisor of Maintenance must review the work plan, including a proper emergency response procedure, with the staff prior to the work being performed. The plan must allow for the work to be performed in a safe manner with adequate lighting. The Supervisor of Maintenance is responsible to ensure that another person with knowledge of the work, its hazards, and with proper emergency response procedures is within shouting distance (i.e. readily available). Where deemed necessary, the Supervisor of Maintenance must perform a risk assessment with the staff. (Refer to *Working Alone Administrative Procedure A-BU-531*).
- 10) Staff members in roof access authorized job categories are responsible to complete the relevant mandatory training prior to accessing a roof.
- 11) Supervisors are responsible to ensure staffs in authorized job categories have completed all the required training.
- 12) All staff authorized for roof access must complete the *Ladder* and *Safe Roof Access* Training courses issued from the Board's online eTraining program prior to accessing a roof. The *Ladder* course is a component of new employee orientation for all staff. Current employees moving into a roof access authorized job category must complete the *Safe Roof Access* course upon hire into the new position before accessing a roof.

- 13) Only Trades and Utility staff may be authorized for extension ladder use and must, prior to using an extension ladder, have a valid Working at Heights training certificate from a Ministry of Labour, Immigration, Training and Skills Development approved course and trainer.
- 14) Any staff accessing heights within a construction project must have a valid Working at Heights training certificate from a Ministry of Labour, Immigration, Training and Skills Development approved course and trainer.
- 15) Where an extension ladder is required to gain access to a roof, staff is responsible to ensure a second worker will hold and steady the ladder on ascent and descent. If the ladder cannot be secured to the building at the top the staff member is responsible to notify the Supervisor.

Safety Protocols:

- 1) Never access a roof if you are subject to dizziness or experiencing a physical injury that restricts the ability to climb a ladder safely.
- 2) All authorized staff members accessing roofs are responsible to adhere to the Board's 10 Foot (3 metres) Rule: never come within 10 feet to an unprotected edge.
- 3) Custodians are responsible to combine tasks when possible to limit how often they access the roof. Retrieve balls and other items that are thrown onto the roof only when going up to complete tasks that are associated with work orders or PMs.
- 4) All authorized staff members must evaluate weather conditions and roof walking surfaces when determining if it is safe to access the roof and shall not access roofs during inclement weather (thunder, lightning, heavy winds, icy conditions, heavy rain, fog).
- 5) Trades and Utility staff must consult with their supervisor to determine which tasks may require a second worker; refer to *Working Alone* Administrative Procedure A-BU-531-1.
[Working Alone](#)
- 6) All authorized staff members are responsible to adhere to the *Hot Weather* Administrative Procedure A-OP-431-13 when accessing roofs during hot weather.
[Hot Weather Procedure and West Nile Virus](#)
- 7) All authorized staff members are responsible to wear fully enclosed treaded footwear that is in good condition and is clean; Non-slip safety footwear with a low heel is highly recommended.
- 8) All authorized staff members are responsible to be extra observant of trip hazards and puncture hazards, such as pipelines, loose gravel, and fallen nails/screws.
- 9) Staff is prohibited from accessing sloped roofs.

Pre-use inspection and Hazard Recognition:

1. All authorized staff accessing Board owned roofs are responsible to:
 - inspect each ladder before use;
 - locate the inspection sticker on each ladder used to make sure the annual inspection was within a 12-month period; submit a work order if an inspection sticker is missing/illegible or more than a year past the date.
 - Refrain from using RED tagged ladders; yellow tagged ladders may be used with caution after first making note of the deficiency described on the tag.
2. All authorized staff accessing Board owned roofs are responsible for making themselves familiar with the annual ladder inspection reports posted on the staff web in the school's Health and Safety folder.
3. All authorized staff accessing Board owned roofs are responsible to immediately report defective or missing equipment (i.e. roof hatch, guardrail system, fixed ladder etc.) and submit a work order and notify their immediate supervisor. If the equipment poses a danger, the worker must ensure that the equipment is immediately tagged "Out of Service". The supervisor must notify the Health & Safety Officer of all identified deficiencies.
4. Any Health and Safety concerns regarding roof access must be reported to your supervisor and the Health and Safety Concern Resolution Flow Chart must be followed.
[Health & Safety Concern Resolution Flow Chart](#)

Implementation Date: March 5, 2018

Revised Date: November 28, 2022

Applicable Legislation, Standards, Documents:

- Occupational Health and Safety Act (OHSA) R.S.O. 1990
<https://www.ontario.ca/laws/statute/90o01>
- O. Reg. 851, R.R.O. 1990, Industrial Establishments; Sections 11, 13, 14, 15, 18, 19, 73.
<https://www.ontario.ca/laws/regulation/90085>
- O. Reg. 253/14 Working at Heights Training – Construction Projects
<https://www.ontario.ca/laws/regulation/r14253>
- Working Alone Administrative Procedure A-BU-531-1
[Working Alone](#)
- Hot Weather Administrative Procedure A-OP-431-13
[Hot Weather Procedure and West Nile Virus](#)
- LKDSB H&S concern Resolution flow chart
[Health & Safety Concern Resolution Flow Chart](#)
- Custodial Manual
- <https://portal.lkdsb.net/department/Business/building-services/Procedure%20Manuals/Manuals/Custodial%20Manual%202022.pdf>