	Safety Policy	HSE Policy No.:	HSE-P-010
	Working At Heights	Original Release:	January 2001
		Revision No.:	5
		Revision Date:	February 2017
		Approval:	Manager HSE

1.0 PURPOSE

This policy is intended to provide guidance to ensure the safety of all workers working at heights on Caesars Windsor property.

2.0 SCOPE

This policy is applicable to all Caesars Windsor employees, visitors, contractors and sub-contractors performing work at heights on the premises of Caesars Windsor.

As per Occupational Health and Safety Act (OHSA):

Where a worker is exposed to the hazard of falling and the surface to which he or she might fall is more than three metres below the position where he or she is situated,

- (a) The worker shall wear a serviceable safety belt or harness and lifeline that is adequately secured to a fixed support and so arranged that the worker cannot fall freely for a vertical distance of more than 1.5 metres; and
- (b) The fall arrest system described in clause (a) shall,
 - (i) Have sufficient capacity to absorb twice the energy and twice the load that under the circumstances of its use may be transmitted to it and,
 - (ii) Be equipped with a shock absorber or other devices to limit the maximum arresting force to 8.0 kilonewtons to the worker.
R.R.O.1990, Reg. 851, s.85; O. Reg. 420/10, s.14.

Amendment: Caesars Windsor employees are required to wear a harness and lifeline. Safety belts are not permitted.

3.0 DEFINITIONS


Anchor - A secure point of attachment for lifelines, travel restraint rope or lanyards that is capable of withstanding a fall restraint load of 800 pounds and a fall arrest load of 5000 pounds.

Control Zone - The area between an unguarded edge and a defined line which is set back a safe distance (approximately 18 inches from the edge).

Exceptional Hazard - An additional hazard over and above the normal hazard of falling to the surface below, for example, falling onto moving parts or onto protruding steel (e.g. protruding steel pipes at the bottom of main water feature).

Fall Arrest Distance - The distance from the point where the worker would start to fall to the point where the fall would be arrested.

Fall Arrest - Stopping a fall before the worker hits the surface below.

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Free Fall - The distance from the point where the worker would begin to fall to the point where the fall arrest system begins to cause deceleration and arrest of the fall (max. of 1.5 metres).

Full Body Harness - A device that provides a means of arresting an accidental vertical or near vertical fall, guiding and distributing the impact forces of the fall by means of leg and shoulder strap supports and an upper dorsal suspension assembly, with provisions for attaching a lanyard, lifeline or other components.

Horizontal Static Line - A 12 millimetre (1/2 inches) diameter improved plow, wire rope that is installed in a horizontal plane between two fixed anchors and used for attachment of a worker's lanyard or lifeline while permitting the worker to move horizontally.

Lanyard - A flexible line of webbing, rope, or cable used to secure a full body harness to a lifeline or anchor.

Lifeline - A vertical line attached to a fixed anchor and used for attachment to a rope grab of a worker's lanyard, full body harness or other device.

Fall Protection System - An arrangement of components such as guardrails, barriers, work platforms or planking that prevents a worker from falling from a work surface.

Fall Arrest System - An assembly of components intended to arrest the fall of a worker if he/she should fall from a work surface. A fall arrest system includes a full body harness to secure each worker to an individual anchor by means of lanyards, vertical lifelines or other connecting device.


Rope Grab - Device at the end of a lanyard attached to a vertical, near vertical lifeline or an anchor point which allows for adjustment of restraint distance.

Shock Absorber - A component whose primary function is to dissipate energy and limit deceleration forces which are imposed on the body during fall arrest.

Swing Fall Hazard - The hazard of swinging and colliding with an obstruction or the ground as a result of a fall of a worker connected to lifeline at an angle to the anchor location.

Travel Restraint - The use of a positioning system to prevent from traveling to an edge beyond which a worker may fall.

Work Procedures - Safe work procedures developed to ensure prevention of fall injuries by the use of proper fall prevention equipment, devices, training and supervision.

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4.0 ROLES & RESPONSIBILITIES

4.1 Managers, Supervisor Responsibilities


- a) Ensure employees working at Caesars Windsor comply with fall protection instructions.
- b) Identify workplace fall hazards through job safety analysis.
- c) Hold pre-job planning meetings to discuss the requirement of the fall protection system. At this time assess the level of engineering controls needed to sufficiently control access to the work area.
- d) Ensure that all fall arrest equipment, including travel restraint and fall arrest for all employees engaged in such activities, meets the CSA requirements (See Appendix A)
- e) Must ensure that PPE needed for the job is used by workers and maintained in good condition.
- f) Provide instruction on safe work procedures for any job requiring working at heights. In addition, each department must have a maintenance and inspection procedure of their fall arrest system and elevated work platforms as per the manufacturer.
- g) Attend and provide training in the proper use of fall restraint and fall arresting equipment and maintain training records.
- h) Ensure contractors working on Caesars Windsor facilities comply with Ontario Ministry of Labour Fall Protection Regulations and Caesars Windsor Working at Heights policy.
- i) Coordinate with the Health and Safety Department and contractors any work to be performed at heights
- j) The department must ensure that annual inspections, tests, repairs, modifications and maintenance performed on the elevating work platform have taken place by a competent person and the inspection record is available to all workers (the record must include the name and signature of the persons who carried out the maintenance, tests or repairs).

4.2 Manager, Health, Safety and Environment Responsibilities

- a) Review workplace-specific written job procedures related to working at heights prior to implementation and periodically audit procedures.

4.3 Employee Responsibilities

- a) Inspect Fall Arrest Equipment prior to use to ensure that it is in good working order and CSA approved. Complete the Pre-Operational Inspection Report – Elevated Work Surfaces.
- b) Follow corporate policies and workplace-specific job procedures provided when working in locations where potential for fall hazard exists. Be knowledgeable of the written emergency procedures in place.

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- c) The spotter will control or restrict access to the drop zone below all elevated work. Engineering controls will be used to assist the spotter with this task. **A minimum of four (4) designated cones (minimum height of 32") will be used for all elevated work.** Any work requiring added controls due to increased risk shall be controlled using caution tape, stanchions or other appropriate controls. Any required added controls are to be reported to the supervisor.
- d) Attend training to understand the requirements and proper use of the Fall Arrest System, travel restraint and fall arrest equipment before use and will be refreshed every 3 years. Use only Caesars Windsor supplied or approved equipment.

5.0 PROCEDURES

- 5.1 A fall hazard assessment must take place prior to the commencement of the work to determine the extent of the fall hazard, the type of equipment required for the work and the anchorage points for attachment.
- 5.2 The supervisor must provide instruction on safe work procedures to the employee prior to the start of the work.
- 5.3 Fall arrest/restraint system must be worn at all times and tied off to engineered anchorage points while lift is in horizontal or vertical motion.

5.4 Fall Arrest

- a) Before each use, workers shall inspect all components of the fall arrest/restraint system for wear, damage and other deterioration as outlined by the manufacturer. Components must be removed from service when the components' function or strength has been adversely affected due to wear or damage or it is greater than five years past the manufacturer date or the in service date (if properly marked on the tag).
- b) Fall protection equipment which has been involved in arresting an actual fall must not be used again until it has been reconditioned and recertified. One time use equipment such as Lifeline, harness etc. involved in arresting an actual fall must never be re-used.
- c) Secure full-body harness systems to anchorage points capable of supporting 2272 kgs (5000 lb).
- d) Protect safety lines and lanyards against cuts or abrasions.
- e) Limit the free fall distance (through rigging) to a maximum of 1.5 metres. Inspect the areas below work location to ensure that there are no obstructions within 1.5 metres (5 feet) of a potential fall that may injure a worker in case of a fall.
- f) Only one employee may be attached to any one vertical lifeline.
- g) Connect only one snap hook to any one D-ring.
- h) Snap hooks must not be connected to one another.

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- i) In the event of an actual fall where a worker cannot return to a stable work surface, co-workers may assist only if their position does not put them at risk of a subsequent fall or injury and they are properly tied off.
- j) **In any rescue that may require special retrieval skills because of location or injury to the fallen worker the supervisor must contact Security who will then contact the Fire Rescue Team of the Windsor Fire Department.**
- k) Follow travel restraint procedures outlined in Section 5.5 as required.

5.5 Travel Restraint


- a) Travel Restraint shall require no less than two workers to perform the work.
- b) The second worker acts as a spotter and observes for obstructions and provides tools and/or supplies.
- c) The rope grab device shall only be adjusted to permit the worker to access within 18 inches.
- d) When traversing over multiple levels and variable distances, the worker should work from the nearest level and gradually proceed to the furthest level while ensuring that the lanyard is taught at all times.
- e) Only the worker attached to the rope grab device shall adjust the devices and the lanyard.

5.6 Work Area

- a) The area around the elevated work platform must be secured and inspected as outlined by the manufacturer.
- b) The elevated work platform
 - Must not be loaded in excess of its rated working load
 - Must be situated on a firm and level surface
 - Must be operated only in accordance with the written instructions of the manufacturer
 - Shall not be loaded and used in such a manner as to affect its stability or endanger a worker

6.0 TRAINING

- 6.1 Employees must successfully complete Caesars Windsor Fall Arrest Training Program prior to performing any job task requiring working at heights.
- 6.2 Employees must also successfully complete training on any equipment that requires the use of fall arrest personal protective equipment (ie. elevated work platforms) prior to performing job tasks using the specified equipment.

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7.0 COMMUNICATION


- 7.1 This policy shall be included in the Health and Safety Manual located in the Document Library of the corporate intranet site.
- 7.2 Activities relating to working at heights shall be communicated through the JHSC Meeting Minutes.

8.0 EVALUATION

- 8.1 This policy shall be reviewed by the Manager, Health, Safety and Environment on an annual basis.
- 8.2 To ensure compliance with the training requirements stated under this policy, the Health and Safety Department will conduct a random audit of employee training records.

9.0 REFERENCES

- CSA International – Fall Arrest Systems Practical Essentials
- Ontario Regulation 851/90 (Regulations for Industrial Establishments)
- Ontario Regulation 213/91 (Regulations for Construction Projects)
- Ministry of Labour Engineering Guidelines (Horizontal Static Lines Used in Fall Arresting Systems)
- Ministry of Labour Engineering Guidelines (Roof Anchorage for Fall Arrest Systems)
- CAN/CSA–Z91-M90 (Safety Code for Window Cleaning Operations)

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10.0 REVISIONS

Revision Number	Revision Date	Revision Summary
1	March 2003	
2	December 2013	<ul style="list-style-type: none"> ▪ Updated format of policy ▪ Removed reference to water feature
3	April 2015	<ul style="list-style-type: none"> ▪ Updated verbiage in Roles & Responsibilities ▪ Expanded on scope to include 'fall arrest/restrain system to worn while lift is in horizontal or vertical motion' ▪ Updated verbiage in 5.4 a)
4	April 2016	<ul style="list-style-type: none"> ▪ Updated verbiage in 5.4 b)
5	February 2017	<ul style="list-style-type: none"> ▪ Updated verbiage in 2.0 to be consistent with language in the OHSA. ▪ Changed approval in header to 'Manager HSE' from VP, Human Resources. ▪ Add assessment of engineering controls to 4.1(c) ▪ Appendix A – Define engineering controls as: safety cone and/or caution tape, minimum height of safety cone is 32" ▪ 4.3(a): Add completion of Pre-Operational Inspection Report – Elevated Work Surfaces. ▪ 4.3(c): Add that a minimum of 4 cones required for overhead work. ▪ Added Appendices 'B' and 'C' ▪ Added Amendment – safety harness and lifeline required - no safety belts permitted.

11.0 AUTHORIZATION



Kelly Wolfe-Gregoire
Vice-President, Human Resources

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APPENDIX A

Equipment Minimum Specifications:

Fall Arrest System:


- Hardware used must be drop forged, pressed or formed steel with a corrosion-resistant finish, with surfaces and edges smooth to prevent damage to the attached lanyard or full body harness
- Vertical life-lines must have a breaking strength specified by the manufacturer as 27 kN (6000lbs); termination knots or splices cannot reduce the strength of the life-line to less than 22 kN (5000 lbs).
- Horizontal static Lines must be twelve (12) mm (1/2 inches) diameter wire rope with a manufacturer specified breaking strength of at least 89 kN (20000 lbs).
- Increase the above forces by 25% if two workers are connected to the same horizontal static line
- Lanyards must have a minimum tensile strength of 2272 kg (5000 lbs)
- Body harness components must be CSA-approved
- Snap hooks must be the self-locking double action type
- Miller Rope Grabs
- Travel restraint rope must be at least 16mm (5/8 inches) diameter nylon or polypropylene rope.

Elevated Work Platform:

- The elevating work platform has been certified by a professional engineer
- The platform must be equipped with guardrails
- The elevating work platform must have signs that are clearly visible to an operator at its controls indicating its rated working load, all the limiting working conditions and warnings by the manufacturer (and direction of machine movement for non boom-type elevating work platforms)
- The elevating work platform must have (clearly visible to the operator) the name and number of the National Standards of Canada standard to which it was designed and the name and address of its owner

Engineering Controls:

- Safety cone and/or caution tape must be utilized on property to block off the area where overhead work is being completed.
- Safety cones must be a **minimum** height of 32", with a minimum of four (4) safety cones required to block off a work area.

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APPENDIX B


Minimum Requirements for Caesars Windsor workers:

Purpose:

- To be compliant with the Occupational Health & Safety Act requirements where a worker is exposed to the hazard(s) of falling.
- To ensure that all Caesars Windsor workers are knowledgeable in the specific Fall Arrest Procedures for those departments using the equipment, specifically:
 1. Engineering
 2. Multimedia
 3. Public Areas
 4. Surveillance

Procedure:

- A fall hazard assessment must take place prior to the commencement of the work.
- With the assistance of the department manager, the type of equipment required for the planned work must be determined.
- The worker must sign out the appropriate equipment from the appropriate departmental area and complete an inspection of the fall arrest equipment prior to using it. In the event that the worker does not feel the equipment passes inspection, it must be removed from use and reported to the department immediately. This equipment will then be tagged by the Manager and turned in to the Health and Safety Department.
- Approved harnesses and lanyards must be worn at ALL times and tied off to approved anchorage points while working at heights, and/or while the lift is in vertical or horizontal motion.
- All elevated work shall be completed by having two workers present. One to perform the work and a second to act as a spotter to ensure the safe travel of the lift and also to ensure the safety of others relevant to the location of the elevated work.
- ALL anchorage points shall be confirmed by two competent people, one of which is performing the work at hand.
- The Department shall ensure that annual inspections have taken place by a competent person and the inspection record is available to ALL workers at a designated departmental location.
- Use of PPE for overhead work, use of chemical and/or projectiles as outlined by departmental Standard Operating Procedures (SOP's).
 - Public Areas: Safety glasses are mandatory with overhead work, dust masks optional for most assignments; some mandatory.
 - Multimedia: Antistatic gloves available to use when hanging equipment.
- Departmental personnel must follow lifting equipment operating instructions and reference training provided by Caesars Windsor.
- Upon completion of the elevated work the worker must report to their Manager and return the fall arrest equipment to the appropriate departmental area(s), where they shall perform an inspection of the equipment before signing it back in. In the event that any equipment has been damaged the worker must report this to the Manager immediately. This equipment will then be tagged by the Manager and turned in to the Health and Safety Department

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APPENDIX C

Minimum Requirements for Contractor workers:

Purpose:

- To ensure that all contractors completing work at Caesars Windsor are knowledgeable in the specific Fall Arrest Procedures.

Contractor Requirements:

1. Contractors are NOT permitted to use any of the Caesars Windsor Elevated Work Platforms or Fall Arrest equipment (i.e. harness).
2. Contractors MUST have a spotter present at ALL times when the lift is in horizontal motion.
3. The work area shall be blocked off with engineering controls (i.e. a minimum of 4 safety cones at a minimum height of 32" or caution tape, etc.) if no spotter is present during actual work, for example, if the lift is in a stationary position during the completion of overhead work.
4. Approved harnesses and lanyards must be worn at ALL times and tied off to approved anchorage points while working at heights, and/or while the lift is in vertical or horizontal motion.
5. When work is being completed in a public area (i.e. gaming floor, etc.), a spotter MUST be present at all times, in addition to the use of engineering controls to block off the area(s).
6. All contractors must have a copy on their person, proof of certification for Elevated Work Platform training completion.