

Ministry of Labour

Health & Safety at Work

Prevention Starts Here

Construction Health and Safety Action Plan



Ministry of Labour

**Construction Health and
Safety Action Plan**

May 2017



Construction Health and Safety Action Plan

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The Honourable Kevin Flynn
Minister of Labour
400 University Avenue
Toronto, Ontario M7A 1T7

Dear Minister Flynn,

I am pleased to provide you with the Construction Health and Safety Action Plan (CHSAP). As you know, this action plan responds to the Premier's September 2014 mandate letter, which included direction in working with the Chief Prevention Officer to strengthen workplace accident prevention in the construction sector, a priority reinforced in the 2016 Premier's mandate letter.

There is, of course, no higher priority in government than keeping Ontarians safe, including at work. This plan is designed to reach workers wherever construction activity exists – on projects both large and small, in companies of every size and in other places of employment where construction occurs. Whether a project is valued in the billions of dollars or in the thousands of dollars, the human and social cost of a worker's injury, illness or death is the same. So, we have an obligation to enable health and safety performance that is consistent across the construction sector, though right now that is not the case.

This action plan was also developed with a view to the strategic importance of the construction industry. Ontario needs a strong construction sector to make foundational investments in our economy – such as infrastructure, hospitals, schools and postsecondary institutions. Construction also fuels economic activity – such as redesigning office spaces, renovating restaurants, opening retail stores and the myriad of other projects that help enterprises to launch and grow. Construction also intersects with personal lives when we build or renovate a home. In short, when Ontarians make plans for the future, construction is very often an enabler. When construction work is done professionally, skillfully and safely, Ontario's economy and its people can better adapt to and lead change.

In fact, demographic change is impacting the construction industry itself. With retirement of current workers, and growth in the economy, we need more Ontarians choosing to work in construction. As new demands emerge for sustainably built, technologically advanced homes and buildings, the construction workforce of tomorrow will need a broader range of technical and problem-solving skills. Effective strategies for preventing workplace injuries and fatalities will contribute to the recruitment and retention of the construction workers Ontario's economy will need.

Important progress has been made in recent years, particularly as a result of the contributions of the *Expert Advisory Panel Report on Occupational Health and Safety*, and the *Healthy and Safe Ontario Workplaces Strategy*. However, the focus on workplace health and safety must be sustained over the long term. The attached plan sets two overarching strategic goals: a more knowledgeable and skilled system and sector; and increased construction sector compliance. It then makes 16 recommendations to make progress towards these goals.

Health and safety is an area of public policy where implementation must be ongoing. There is immediate importance to this work in helping to ensure that workers return home safely at the end of the day. That is why the Ministry of Labour and Chief Prevention Office are already implementing recommendations aimed at priority areas of concern identified by the advisory group.

This action plan was created in close partnership with employers, workers and other partners. It will be implemented in the same spirit of collaboration. Together, we've established the key performance indicators that will measure whether the recommendations are hitting their mark and having success. We will adapt our plans, as needed, to ensure progress is made, and to address emerging priorities.

My office and the ministry will work with the committed people in the construction sector to sustain health and safety progress over the long term—to ensure more workers return home safely and to help build the workforce Ontario will need to keep building well into the future.

Yours truly,

George Gritziotis

Chief Prevention Officer

Associate Deputy Minister

The CHSAP Advisory Group

The advisory group members showed leadership and a true commitment to collaborate in order to strengthen the promotion of health and safety through CHSAP. Many people at the Ministry of Labour and the Infrastructure Health and Safety Association have contributed. Parliamentary Assistant Mike Colle provided valuable insight through his engagement of the construction industry and the broader health and safety community. The report also benefits from two construction stakeholder task groups, as well as from many construction stakeholders who participated in consultation sessions held across the province.

Labour Representatives:

Joe Dowdall

Director of Training and Apprenticeship,
International Union of Operating Engineers (IUOE),
Local 793

James Hogarth

President, Provincial Building and Construction
Trades Council of Ontario and Business Manager,
Ontario Pipe Trades Council

Cosmo Mannella

Business Manager (retired)
LIUNA Ontario Provincial District Council

Carmine Tiano

Director of Occupational Services,
Provincial Building and Construction
Trades Council of Ontario

Mike Yorke

President, Carpenters' District Council of Ontario,
Local 27

Employer Representatives:

Samuel Lapidus

President, Keystone Ridge Developments Ltd.

Tom McLaughlin

Finance Manager, Thomasfield Homes Ltd.

Dave McLean

President, Southwestern Ontario,
Mattamy Homes

Steve Riddell

Regional Safety Director, EllisDon Corporation

Mike Wieninger

Senior Vice President and District Manager,
PCL Constructors Canada Inc.

Executive Summary

In March 2015, the Minister of Labour established an advisory group to assist the government in the development and implementation of a Construction Health and Safety Action Plan. As set out in the Ministry of Labour 2014–15 mandate letter, the action plan will strengthen workplace injury and illness prevention for construction workers across the province. Members of the advisory group—which includes an equal number of labour and employer representatives—worked with Parliamentary Assistant Mike Colle and the province’s Chief Prevention Officer on finding best ways to:

- » Increase the commitment to health and safety in construction workplaces
- » Enhance training for workers in the construction sector
- » Work with other enforcement authorities and municipalities to improve safety
- » Build an awareness about construction health and safety among young people
- » Encourage effective supervision of construction workers
- » Ensure legislation and regulations are better understood by the construction sector
- » Ensure effective consumer outreach strategies

SNAPSHOT OF THE SECTOR

The construction sector is a priority because of its size, diversity and the nature of health and safety challenges. Construction accounted for 6.7 percent of Ontario’s GDP in 2015. It is the province’s seventh largest sector, with approximately 500,000 current workers.

Approximately 85,000 construction workers, or 21 percent of the current labour force, are expected to retire over the next 10 years. At the same time, the province’s construction labour force will need to grow by approximately 23,000 workers to meet the demands created by increased construction activity. As a result, Ontario will need to attract about 110,000 new construction workers by providing opportunities for young workers or newcomers.

Construction work includes the labour of specialized trades that work on major industrial, commercial or institutional projects. It can also include workers on small-scale residential and home renovation projects, some of which might be operating on a cash basis within the underground economy. Construction work activities are also performed in other industries such as manufacturing and industrial establishments, health care facilities or schools. Construction workers include sheet metal workers, rod workers, drywall finishers, painters, electricians, precast concrete erectors, plumbers, hoisting engineers, and masons, to name a few.

In construction, many workers continually change workplaces. On a single job site, the environment changes as work progresses, which can create challenges in controlling hazards. The majority of construction firms are small businesses, with 45 percent of Ontario's construction workers employed by businesses with fewer than 20 workers. These and other factors present challenges unique to the sector.

OCCUPATIONAL INJURIES AND ILLNESSES REMAIN PERSISTENTLY HIGH

Approximately 30 percent of all work-related traumatic fatalities and occupational disease fatality claims for Schedule 1 workplaces in Ontario occurred in the construction sector, yet the sector comprises only 6.7 percent of all provincial employment and 8.4 percent of WSIB-insured employment. In the construction sector:

- » 36 percent of traumatic fatalities are due to falls from heights.
- » 51 percent of fatal occupational disease claims are for Mesothelioma, a rare, aggressive form of cancer caused by exposure to asbestos.
- » 53 percent of non-fatal occupational disease claims are associated with noise-induced hearing loss.

THE PROCESS

The CHSAP is a product of widespread and inclusive consultation. This included an initial meeting of approximately 40 people representing employers and workers, sessions around the province involving 274 construction stakeholders, a Home Renovation Construction Safety Roundtable hosted by Parliamentary Assistant Mike Colle, three regional sessions involving 86 of the ministry's construction health and safety inspectors. There were also 15 meetings involving a total of 250 people to confirm support for the plan.

The resulting Construction Health and Safety Action Plan set two overarching strategic goals, with corresponding objectives and recommendations.

Goal 1: A more knowledgeable and skilled system and sector

The objectives associated with creating a more knowledgeable and skilled system and sector includes enhancing the Internal Responsibility System (IRS), increasing access to new and existing resources and improving training and education in the sector.

Recommendations:

- 1.** Create a culture and climate of safety within construction by planning, creating and supporting ongoing multi-media OHS awareness campaigns that promote the importance of workplace occupational health and safety with industry stakeholders as well as consumers.

2. Increase safety knowledge in the construction sector by promoting awareness of the top construction sector hazards (falls from heights, motor vehicle incidents, struck by objects, machinery) and how to control these hazards through new and improved information channels, including industry, government and other stakeholder partnerships.
3. Support the role of the supervisor in creating and maintaining a culture that fosters worker participation in identifying and mitigating workplace hazards.
4. Identify and develop “workplace friendly” resource tools focused on the top hazards in construction (falls from heights, motor vehicle incidents, struck by-object, machinery), with a particular focus on small- and medium-size businesses.
5. Build and support multi-stakeholder partnerships and distribution channels that enable better flow of health and safety resources.
6. Create a strategy for career-long health and safety learning for the construction sector.
7. Develop stronger partnerships with the education system to reach students, teachers and employers that participate in construction-directed experiential learning programs.
8. Identify, review and enhance health and safety content of apprenticeship training standards.

Goal 2: Increased construction sector compliance

The objectives associated with the goal of increasing construction sector compliance are ensuring regulatory requirements are up-to-date and effectively communicated and understood, setting appropriate penalties and incentives and focusing strategic enforcement initiatives on priorities.

Recommendations:

9. The Ministry of Labour (MOL) is to work with health and safety (H&S) system partners to create plain language resources materials on high priority hazards to help small- and medium-size employers interpret existing legislative and regulatory requirements and understand what is required to comply.
10. The MOL to support the development of guidance material, in future, when making regulatory changes to assist the construction sector in complying with new requirements.
11. The CPO to work with stakeholders to improve the use and design of fall-protection equipment in the residential construction and roofing sectors by:
 - i. Exploring opportunities to work with the Ministry of Municipal Affairs to require fall-arrest anchor points on residential low-rise buildings including single family residences.

- ii. Collaborating with engineering and fall protection system experts to find innovative approaches to the use of existing equipment as well as the development of alternative approaches to preventing fall of workers from residential roofs.
- 12.** MOL to explore opportunities to work with Ministry of the Attorney General and stakeholders to expand the application of tickets to a broader range of contraventions of the construction project regulation and increase the current fine amounts.
 - 13.** MOL to work with stakeholders to explore the use of Administrative Monetary Penalties under the OHS Act and identify specific offences to apply them to the construction sector.
 - 14.** The CPO to explore opportunities to work with stakeholders to create incentives that motivate excellence in health and safety beyond minimum compliance, such as accreditation.
 - 15.** The MOL to conduct strategic enforcement campaigns in construction based on risks and high hazards for the sector on continuous basis.
 - 16.** Enhance information sharing within OHS system and other stakeholders to support blitzes and other targeted enforcement.

HOW WE WILL MEASURE PROGRESS

The Ministry of Labour has three established key performance indicators (KPIs) that will be monitored over the next five years. These are:

- 1.** Reduce the allowed lost-time injury rate per 100 workers by 10 percent over five years (through robust education, training and certification programs and enforcement).
- 2.** Reduce traumatic fatalities per 100,000 workers by 2 percent over five years (through education, training, certification programs and enforcement).
- 3.** Increase number of businesses engaged by the workplace health and safety system by 15 percent over four years.

The CHSAP will measure the LTI rate as well as the traumatic fatalities rate for the construction sector as performance indicators, thereby monitoring sector-specific data that contribute to two of the Ministry's KPIs. Outputs of activities performed under the CHSAP will be measured to establish baseline data and allow for measuring progress over time. Measurement will also take into account that key performance indicators will be influenced by other factors, in addition to the recommendations. The action plan will be a work in progress, and be updated regularly to seek continuous improvement and respond to emerging priorities.



Introduction

Construction is one of the highest-hazard industries in Ontario. It had the highest average number of occupational traumatic fatalities between 2010 and 2015. During this period, the construction sector accounted for 30% of all traumatic fatalities with an average of 20 traumatic fatalities per year, although construction comprises only 7% of total employment in Ontario.ⁱ

In May 2015, the Minister of Labour established an advisory group to assist the government in the development and implementation of a Construction Health and Safety Action Plan (CHSAP). As set out in the Ministry of Labour 2014–15 mandate letter, the CHSAP will strengthen workplace injury and illness prevention for construction workers across the province. The advisory group is made up of an equal number of labour and employer representatives and worked with the Parliamentary Assistant Mike Colle and the province's Chief Prevention Officer in developing this report and its recommendations.

SNAPSHOT OF THE SECTOR

The Occupational Health and Safety Act (OHSA), defines “construction” as including erection, alteration, repair, dismantling, demolition, structural maintenance, painting, land clearing, earth moving, grading, excavating, trenching, digging, boring, drilling, blasting or concreting, the installation of any machinery or plant, and any work or undertaking in connection with a project (excluding any work or undertaking underground in a mine).ⁱⁱ

Key Facts

- Approximately **30%** of all work-related traumatic fatalities and occupational disease fatality claims for Schedule 1 workplaces in Ontario occurred in the construction sector, yet it comprises only **6.7%** of all provincial employment and **8.4%** of WSIB-insured employment.¹ **36%** of traumatic fatalities in the construction sector were due to falls from heights.
- Between 2010 and 2014, mesothelioma caused **51%** of fatal occupational disease claims.
- **53%** of non-fatal occupational disease claims in the construction sector are associated with noise-induced hearing loss.

VITAL TO THE ECONOMY

Construction is Ontario’s seventh largest sector, with approximately 500,000 workers, with 45% employed by businesses with fewer than 20 workers.ⁱⁱⁱ In 2015, the construction sector contributed over \$36 billion to Ontario’s gross domestic product (GDP), which was 6.7% of Ontario’s total GDP for that year.^{iv} 45% of Ontario’s construction workers are employed by businesses with fewer than 20 workers.

From 2006 to 2016, employment in construction increased by 20.7%.^{v vi}

The outlook for the province’s construction sector is positive, as Ontario’s economic growth is outpacing national growth and is expected to continue to be among the strongest in Canada for the next two years.

KEY DEMOGRAPHICS

Approximately 85,000 construction workers, or 21% of the current labour force, are expected to retire over the next 10 years. At the same time, the province’s construction labour force will need to grow by approximately 23,000 workers to meet the demands created by increased construction activity. As a result, Ontario will need to attract about 110,000 new construction workers.^{vii} This demographic shift will have implications for preventing workplace injuries and fatalities.

Construction workplaces are extraordinarily diverse in the type of activities that they encompass and the types of workers that they employ. For example, construction work

can include the labour of specialized trades that work on major Industrial-Commercial-Institutional (ICI) projects, such as sheet metal workers, rod workers, drywall finishers, painters, electricians, precast concrete erectors, plumbers, hoisting engineers, and masons, to name a few. It can also include workers on small-scale residential and home renovation projects, some of which might be operating on a cash basis within the underground economy.

In 2014, the WSIB rate groups with the highest covered employment within the construction sector included “mechanical and sheet metal work,” followed by “homebuilding” and “electrical and incidental construction services”.^{viii} Also, construction work activities are performed in other industries such as manufacturing or health care facilities, and schools.

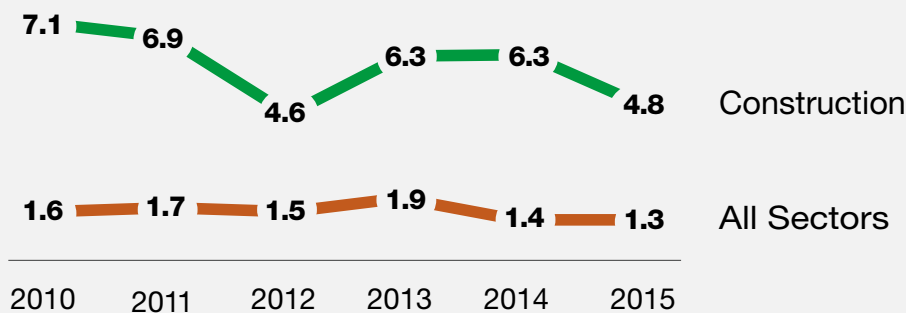
A FATALITY RATE HIGHER THAN OTHER SECTORS

Overall, the construction sector fatality rate has fluctuated in the six years from 2010 to 2015. The fatality rate per 100,000 workers dropped from 7.1 in 2010 to 4.6 in 2012, however, it increased to 6.3 in the next two years. In 2015, the fatality rate once again decreased, this time to 4.8, but it remains significantly higher than the rate for all sectors combined.^{ix}

The top causes of traumatic fatalities in the construction sector over the last five years were falls from height (36%), motor vehicle incidents (20%) and struck-by or caught-in objects (14%).^x

Traumatic fatality trend in construction

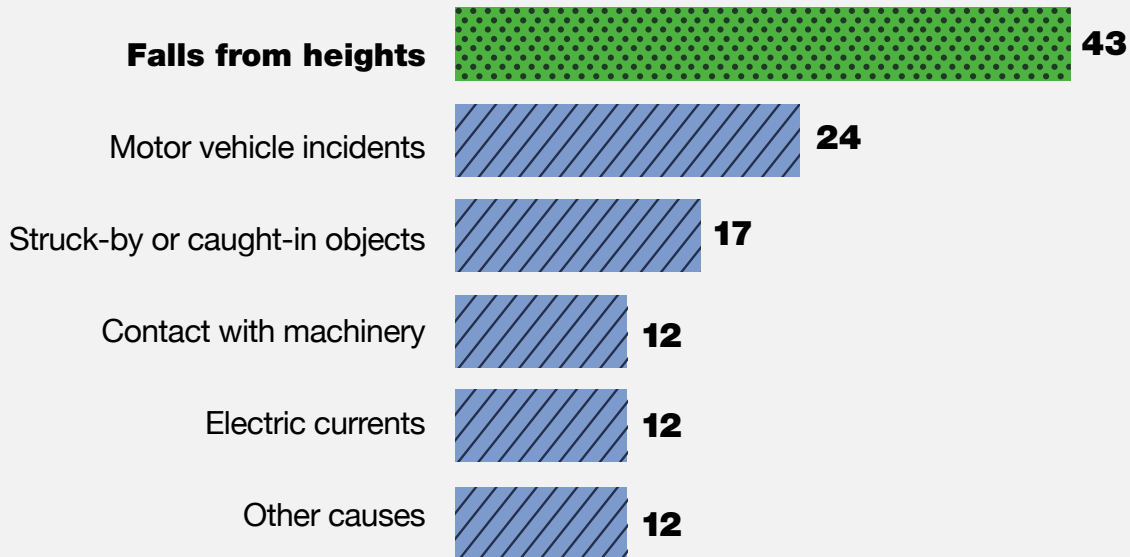
Allowed Traumatic Fatality Rates per 100,000 workers for Construction and All Sectors – Schedule 1



Source: Workplace Safety and Insurance Board By the Numbers 2015, Schedule 1. Rate calculations by Ministry of Labour.

Most traumatic fatalities are due to falls from heights

Causes of Allowed Traumatic Fatalities in Construction – Schedule 1 Employers
2010–2015 (numbers)



Source: WSIB Enterprise Information Warehouse. Data as of March 31st of the following year of each injury/illness year. Data was extracted by Ministry of Labour and may not match data previously published by WSIB.

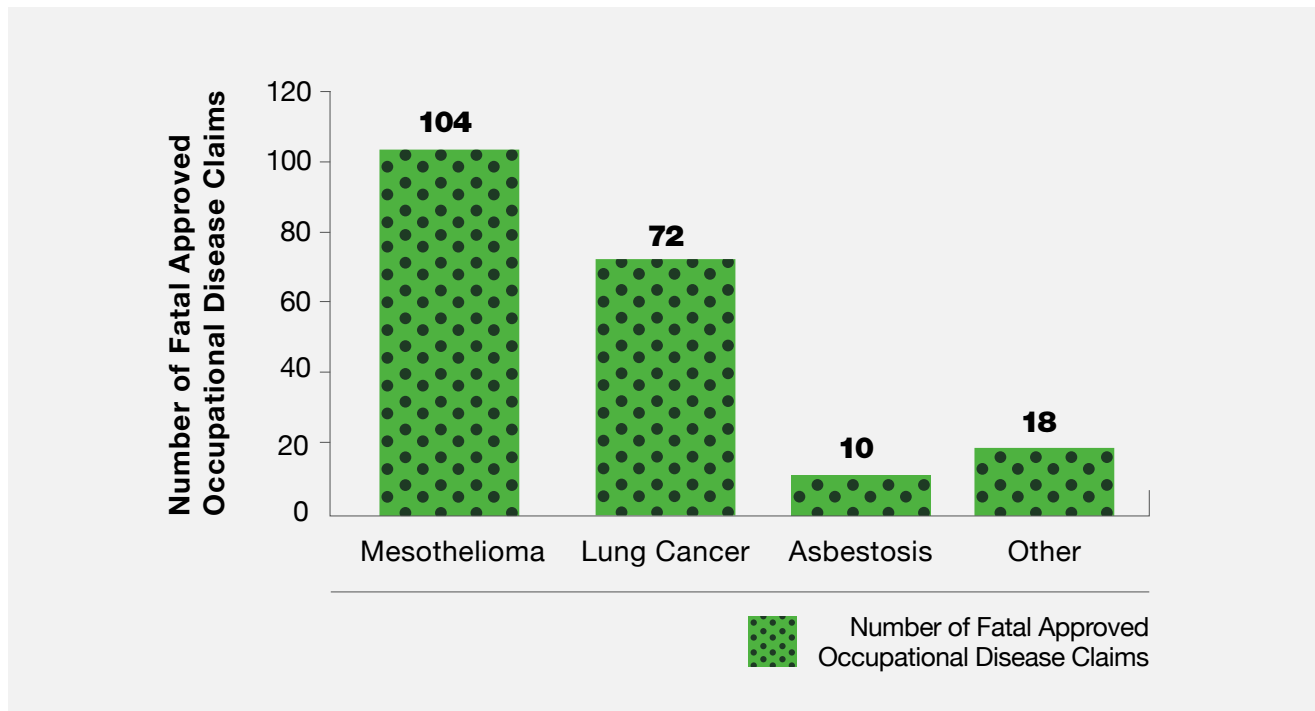
EXPOSURES ARE SIGNIFICANT HEALTH ISSUE

Exposures to agents that cause occupational disease are a significant issue for the construction sector. WSIB claims data show that the construction sector had an annual average of 41 fatal occupational disease claims approved between 2010 and 2014.^{xi} Over this period, the top causes of fatal occupational disease claims were mesothelioma (51%), lung cancer (35%), and asbestosis (5%).^{xii}

An average of 1,090 non-fatal occupational disease claims per year were approved by the WSIB in the same period. The majority of these claimants were diagnosed with noise-induced hearing loss (53%), followed by a variety of health effects including hand-arm vibration (9%) and dermatitis (7%).^{xiii}

Fatal Approved Occupational Disease Claims by Diagnosis

Construction Rate Groups, 2010–2014



Source: Infrastructure Health and Safety Association. May 4, 2016. Fatal Approved Occupational Disease Claims by Occupation: Construction Rate Groups. Provincial Labour-Management Health and Safety Committee: Review of Occupational Disease Claims.

SIGNIFICANT LOST TIME INJURY RATE

Although the rate of lost time injuries (LTIs) has been decreasing in the construction sector, the sector had the fifth highest average number of allowed LTIs among all sectors from 2010 to 2015. The top causes by number of LTIs in the construction sector were “struck by objects or equipment,” “fall/jump to lower level,” and “overexertion”.^{xiv}



CHSAP Consultations

STAKEHOLDER CONSULTATION PROCESS

The CHSAP is a product of widespread and inclusive consultation, as well as background research and data analysis. The consultation consisted of two phases: the first to determine the focus and themes of the CHSAP, and the second to determine the best way to support implementation.

Phase 1 – Identifying Key Themes (Fall/Winter 2014)

An initial workshop in November 2014 brought together employer and worker representatives to develop priority areas and activities for the CHSAP. Participants created a draft list of actions and then ranked them. Parliamentary Assistant Mike Colle held a Home Renovation Construction Safety Roundtable with employer and worker representatives in December 2014.

Further consultations focused on **seven themes:**

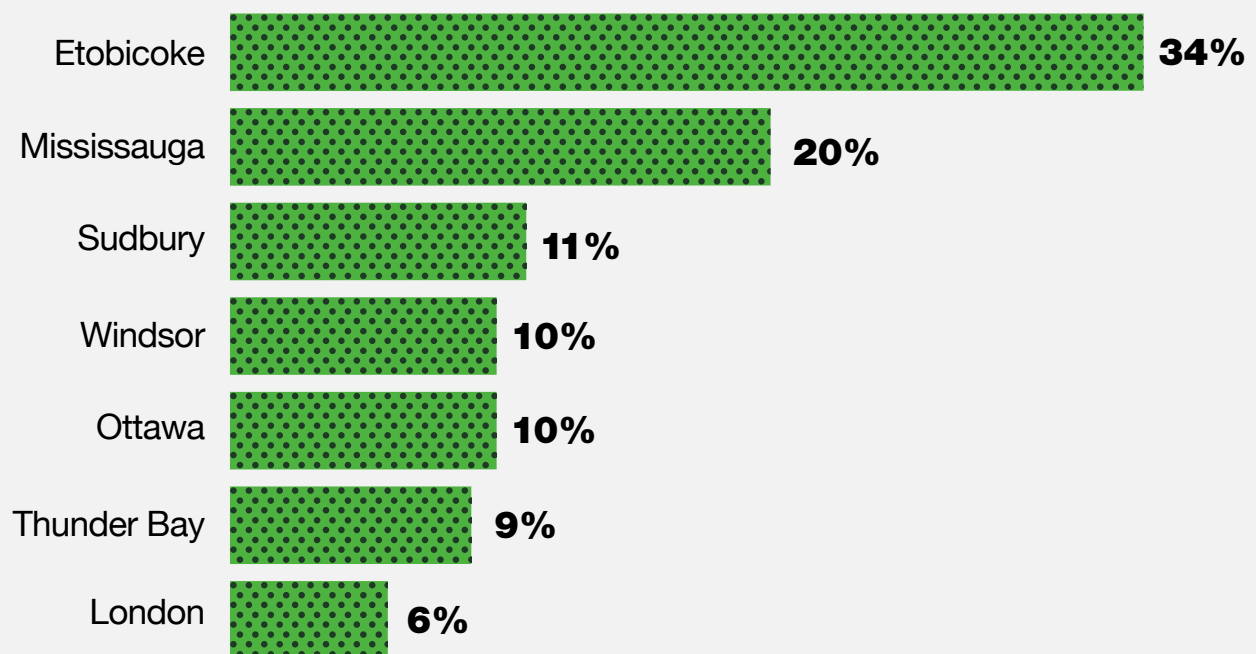
- 1. Social Marketing & Awareness:** Extending our reach through social marketing and awareness initiatives that encourage everyone to make health and safety a priority
- 2. Workplace Participation:** Increasing participation and accountability of all workplace parties to comply with the law and create a healthy and safe work environment to keep workplaces safe
- 3. Youth and New Workers:** Working with youth and new workers so a culture of health and safety starts early
- 4. Education and Training:** Enhancing health and safety training in the construction sector
- 5. Legislation and Regulation:** Ensuring the *Occupational Health and Safety Act* (OHSA) and its regulations are up to date and understood by stakeholders
- 6. Supervision:** Putting more emphasis on effective supervision in the workplace
- 7. Partnerships and Collaboration:** Collaborating with other enforcement authorities, including municipalities as well as with construction stakeholder organizations

Phase 2: Guiding Implementation (Fall 2015)

In the second phase of the consultation, in fall 2015, the Ministry of Labour held targeted construction stakeholder sessions to gain input on implementing the proposed themes and action items.

In total, 274 construction stakeholders participated in seven consultation sessions across the province, as well as three sessions with 86 MOL Construction Health and Safety inspectors. An optional electronic survey was also sent to session participants to solicit additional feedback, and a summary of consultation findings was shared with the participants.

Participants in In-Person Stakeholder Consultation Session



THE CHSAP ADVISORY GROUP AND STAKEHOLDER TASK GROUPS

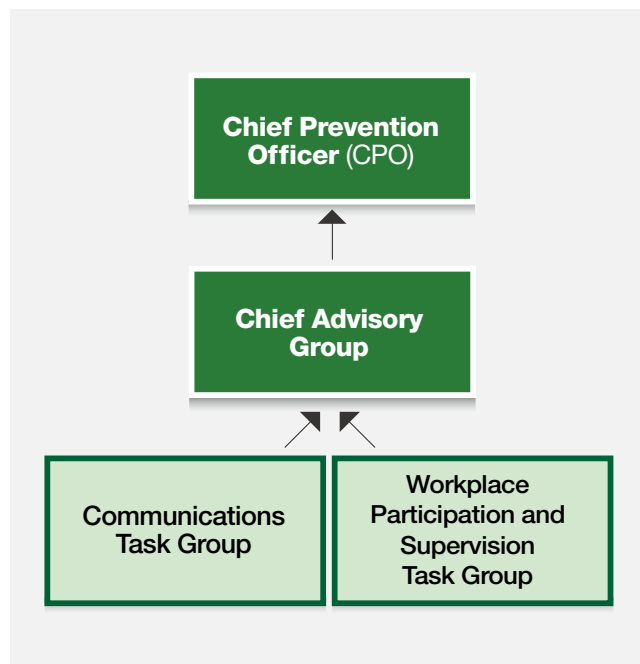
The CHSAP Advisory Group was established on March 31, 2015, to advise the CPO on the development and implementation of the CHSAP. The CHSAP Advisory Group comprises construction stakeholders, with an equal number of labour and employer representatives.

The CHSAP Advisory Group created two task groups to undertake further work and to provide the CPO and the Advisory Group with advice on enhancing OHS Communications and Workplace Participation and Supervision.

Workplace Participation and Supervision Task Group

The Workplace Participation and Supervision Task Group recommended ways of encouraging all workplace parties to be involved and accountable in complying with — and even exceeding — minimum legal requirements to create a healthy and safe work environment.

The group focused on identifying resources that help with compliance, initiatives that promote attitudinal change, and best practices that help supervisors and workers create a culture that supports occupational health and safety.



The Communications Task Group

The Communications Task Group was created to identify the actions and initiatives that promote increased compliance with legislative obligations under OHSA, and to raise awareness among workplace parties. The group proposed activities that could raise awareness of occupational health and safety among employers, constructors and workers in the sector through existing communication channels.

Consultation Findings

SOCIAL MARKETING AND AWARENESS

Issue

The importance of health and safety is ingrained into the culture of many construction employers. However, many are not aware of their obligations under OHSA, and need supports and tools to improve their understanding. This is especially true of small employers.

Continual communications and awareness initiatives can encourage organizations to embrace health and safety as part of its workplace culture. This means communicating the importance of health and safety in all aspects of the construction process, from the planning stages through to the building and construction and maintenance. Messaging also needs to be targeted at the large institutions and individual consumers who purchase construction services. Reaching the general public can enable family members to stress the importance of safety to loved ones in the construction sector.

What We Heard

It can be difficult to reach small firms (including home renovators on short-term projects). It is particularly difficult to

reach those operating in the underground economy, as well as those with limited literacy or language barriers. There are also generational differences in how workers access information.

Construction stakeholders recommended that labour groups, employers, construction associations, Health and Safety Associations, the WSIB, the Ministry of Labour, and other partners should leverage existing communications networks and social media to raise awareness about health and safety. Others recommended the use of a broad multi-media campaign to raise awareness among the general public and homeowners who hire residential contractors (i.e., television, radio, and the Internet).

Analysis

The Ministry of Labour has undertaken a media and social marketing campaign focused on enhancing awareness of working at heights training requirements and residential roofing safety. There has not been any broad prevention-focussed campaigns specifically directed towards construction. The CHSAP Communications Task Group supported the development of health and safety-focused communications. A coalition of public sector organizations (such as the Ministry of Labour, the Ministry of Finance, and the health and safety associations), private sector organizations (such as labour groups, construction associations, and others) as well as suppliers to the construction industry could use their existing

and new communication channels to maximize the reach and influence of such campaigns.^{xv}

The Advisory Group discussed the value of communicating fatalities quickly after they occur in order to promote prevention. The impact of a tragic incident could gain greater attention and motivate enhanced prevention efforts as well as create an opportunity to provide prevention resource materials to stakeholders.

WORKPLACE PARTICIPATION

The Issue

The theme of workplace participation resonated well with stakeholders and Ministry of Labour construction health and safety inspectors. Many stakeholders spoke of unsafe situations being tolerated despite knowledge of the hazard and ways to prevent it. Knowledge and access to information about health and safety are critical, but if there is not supportive “culture” or a “climate” for health and safety, people may be reluctant to act.

What We Heard

Incentives and penalties should be used more to support a culture of safety. Employers, supervisors and workers need to know that increasing safety is a positive step, and that there are consequences for creating unsafe situations. Also, we heard that workers need to be protected from reprisals for reporting unsafe work practices. Stakeholders shared examples of employers having recognition

and reward programs to reinforce safe practices and accountability for OHS.

The issue of repeat offenders was a particular area of concern, with suggestions for more effective penalties and consideration of increased fines and penalties for repeat offenders of the Occupational Health and Safety Act (OHSA) and its regulations.

There was also interest in worker and supervisor recognition programs or other ways of promoting culture of health and safety at all levels in the workplace. Other ideas included rating employers on their safety record so that a positive rating would be required to be eligible to bid on projects. Another suggestion was an accreditation program that would recognize employers who go beyond minimum compliance with the OHSA.

Analysis

The MOL has enforcement tools, which include the issuing of orders for non-compliance with the Occupational Health and Safety Act and its regulations as well as tickets and prosecutions commenced under the Provincial Offences Act.

Part I Offence Notices (Tickets) can be issued for certain contraventions of the Construction Projects Regulation. These tickets have fine amounts that are set by the Chief Justice of Ontario. In addition to setting the fine amounts, the Chief Justice of Ontario determines to which contraventions of the OHSA or its regulations tickets will apply.

Stakeholders advised that the fine amounts are too low to provide an effective deterrence and are often accepted as a “cost of doing business,” since they can be less than the cost of complying. In addition, they indicated that tickets did not apply to a large enough number of contraventions and that their application should be expanded.

In addition to issuing tickets, Ministry of Labour inspectors use Part I Summons and Part III Informations for prosecuting contraventions of the OHSA and its regulations. These involve court appearances and provide for larger fine amounts than tickets (Part 1 has a maximum of \$1000; Part III has a maximum of \$500,000 for corporations and \$25,000 for individuals).

Stakeholders indicated that higher fine amounts would be a better deterrent. A number of jurisdictions use a system of Administrative Monetary Penalties (AMPs) for specified contraventions of OHS requirements. Stakeholders see AMPs as a valuable tool because they have the opportunity for higher financial penalties, the ability to escalate amounts for repeat offences, as well as the ability to make the penalty immediate. Similar benefits for the use of AMPs were heard by the Expert Advisory Panel resulting in their recommendation for considering AMPs. The Advisory Group supported the exploration of AMPs and higher penalty amounts.

YOUTH AND NEW WORKERS

Issue

Youth and new workers are an important target group for health and safety activities in the construction sector. “Young workers” are under the age of 25. “New workers” can be of any age who are on the job for less than six months or who are assigned to a new job.

Generally, new and young workers are three times more likely to be injured during the first month of employment than at any other time.^{xvi} There are many reasons for this, but a key one is that new and young workers lack the experience and training to recognize and avoid hazards.

With changing demographics in the industry, it is important to develop knowledge and positive attitudes towards the importance of occupational health and safety at a young age, when workers first start entering the labour force or when new workers first enter construction or change jobs.

What We Heard

Discussions focused on potential actions that would prepare young workers to enter the workforce, reduce young worker injury, and lay the foundation to improve health and safety practices for the next generation of workers.

There was agreement on the importance of educating children and youth about health and safety before they enter the work force. Many stakeholders were unaware that occupational health and safety topics are

currently embedded throughout the Ontario public school curriculum. Others felt that more health and safety knowledge and practices should be built into the training requirements for trade apprenticeships. Stakeholders felt that including OHS information as students and apprentices learn the skills of working in construction will result in safer work practices as well as strengthen their values related to safety. Also, it is important to provide awareness tools for “influencers” such as parents and teachers.

Stakeholders reinforced that a large number of new workers will be needed in construction over the next 10 years; not all of them will enter through the educational system as described above. They indicated that many of these workers are likely to come from other sectors and that many are likely to be immigrants to Ontario. These workers will need training on construction hazards as well as how to work safely. Their employers will need to be aware of the importance of this training, what specific training is required, and how to provide it.

Analysis

While general health and safety learning expectations are included in the elementary and secondary curriculum, the Grades 9-12 Technological Education curriculums are the only ones in which construction-specific health and safety content exists. Construction Technology is one of ten broad based technological education subject areas in Grades 9–12, with several construction focused courses available for schools.

In addition to the Technological Education curriculums, schools may be approved by the Ministry of Education to offer a Specialist High Skills Major (SHSM) program. The SHSM allows students in Grades 11 and 12 to focus their learning on one of 19 specific economic sectors while meeting the requirements for the Ontario Secondary School Diploma (OSSD). Construction is one of the 19 economic sectors, with over 3,700 students enrolled in 176 programs across the province for the 2016–17 school year. A SHSM enables students to gain sector-specific skills and knowledge, including health and safety, working at heights and the Workplace Hazardous Materials Information System.

The Ministry of Labour and the Ministry of Education have partnered to produce a resource guide for parents, students, educators and other stakeholders identify learning expectations and opportunities on health and safety, safe behaviours and safe practices from Ontario’s current K-12 curriculum. The resource guide demonstrates that health and safety learning progresses through the course of a student’s school career, and that a solid foundation for health and safety knowledge and skills exists throughout the curriculum. The Ministry of Education plans to post the resource guide in spring 2017.

Ontario’s apprenticeship training standards currently include differing amounts of health and safety training. Some trades contain detailed descriptions of health and safety requirements embedded within

specific learning elements of the trade. Others describe more general requirements associated with the trade but not linked to specific learning or work activity.

EDUCATION AND TRAINING

The Issue

In general, the amount and quality of health and safety training provided to construction workers varies widely across the province. Construction workplaces are extraordinarily diverse in the type and scale of projects and activities undertaken. Some employees are permanent while others are temporary or hired for short projects. Training capacity also varies widely among employers. Furthermore, workers may be entering the construction sector at different times in their career, including formal channels through the education or apprenticeship training system, as new immigrants, or as a second career with little formal construction training.

What We Heard

Stakeholders emphasized the importance of education and training to improving health and safety outcomes in construction. Many of the comments focused on changes to existing training requirements to ensure that they are accessible, cost effective, support different learning styles and that training requirements are kept up to date. Others also commented that, even with regulatory requirements for training, it is up to individuals to identify, participate and frequently engage in learning, training and sharing information that would

improve health and safety outcomes in construction workplaces. Some stakeholders suggested introducing new mandatory training for specific work activities such as traffic/vehicle controls and use of mobile elevated work platform equipment.

Analysis

The Ministry of Labour and CHSAP Advisory Group recognized that traditionally the focus on training has been on a singular or one-time training requirement to address a specific hazard or technology. A career-long health and safety training strategy is needed to address all the challenges and priorities related to OHS education and training in construction. Occupational health and safety training should be integrated throughout a worker's career. This can mean learning in the school system, skills-based training through apprenticeship, on-the-job training, or knowledge acquired as an individual pursuing career development.

LEGISLATION AND REGULATION

The Issue

Legislation and regulations use highly technical and legal terms which are generally not fully understood by many construction industry employers, supervisors and workers. In addition, much of it uses “performance” language such as “appropriate, sufficient, capable of,” which requires technical expertise or previous experience to interpret.

Some resources and supports already exist in order to help workplace parties understand the OHSA and its regulations. For example, the Ministry of Labour has produced resources on “Who is a Supervisor under the Occupational Health and Safety Act?”^{xvii} Making these resources easy to understand and accessible within the construction industry is a challenge. Discussions focused on whether any specific areas need additional guidance materials.

Construction methods, equipment and materials are constantly changing, thereby introducing new OHS issues and hazards, as well as eliminating others. OHS requirements in law need to be up-to-date and be capable of continuing to address health and safety issues as technology changes.

What We Heard

Employers need a better understanding of the law in order to achieve compliance. Guidance and best practice materials that are short, simple, and sector-specific were a common theme raised by construction stakeholders.

Construction workers, supervisors and employers have difficulty accessing these resources — particularly for small firms and workers with language barriers. The Ministry of Labour heard suggestions that such resources should be provided to workplace parties in the construction sector through web applications, email, social media, and work-site posters.

Stakeholders provided examples of current legal requirements which may not have kept pace with changes in technology, work methods, or hazards in construction. In some cases, technology has eliminated hazards, introduced new ones or changed how the hazards must be controlled. In such situations, the legal requirements may need to be amended to be kept up to date. It is essential that the legal requirements are reviewed to remain current and applicable to new technology.

Stakeholders also raised the issue of occasional or short-term rentals of equipment. Those operating rental equipment may lack competence or sufficient health and safety training. While some examples of such equipment were raised, it was acknowledged that further research on this issue was warranted.

Stakeholders identified that high-risk activities in construction should be the focus of enforcement activity, prevention, and inform legislation and regulation. The Regulation for Construction Projects under the OHSA requires “Notice of Project”

information to be provided to MOL to assist in the targeting of inspections. During the consultations, industry stakeholders and ministry inspectors suggested that the high-risk activities requiring notice should be expanded to include other construction work such as residential roofing. This could be valuable where the hazardous work is short duration and might not be subject to more frequent inspections.

Analysis

Injury and illness data, as well as non-compliance information gathered by ministry inspectors, are important in determining policy and enforcement priorities. However, as important as this analysis is, it relates to conditions of the past. It is also important to gather and analyze information that predicts future needs and priorities—leading indicators. One effort to gather such leading indicators has involved employers and workers participating in evaluations of risk within residential construction as well as residential roofing specifically. Based upon their expert experience, the risk analysis ranks hazardous work activity and the underlying factors that contribute to the hazard. This information can then be used to inform policy, enforcement, and prevention priorities.

A large percentage of fatalities and critical injuries in construction are associated with work on residential roofs. The Ministry of Labour has targeted working at heights and residential roofing through the Working at Heights (WAH) training standards, inspection blitzes, and the Underground Economy

Residential Roofing Pilot Project. Using fall-arrest equipment in residential roofing work requires considering the specific features of each house and the equipment being used. This is why training is very important and a key element of this Action Plan.

Currently, the Building Code requires installation of fall protection anchors on high rise buildings. We have heard from the stakeholder consultations that fall arrest anchors might also be valuable for low-rise residential construction. There is merit to exploring this topic further, including working with the Ministry of Municipal Affairs to consider amendments to the Building Code. Stakeholders have suggested that innovative approaches and engineering solutions are needed to prevent falls.

The introduction of new technology requires legal requirements to be developed in a timely way and be capable of addressing future changes. Despite identifying some examples for regulatory changes, most stakeholders felt that the emphasis of activity needed to be on helping employers, supervisors and workers understand current laws and find information on how to comply with them.

SUPERVISION

Issue

Supervisors play a critical role in ensuring a workplace is safe and healthy. The success of the supervisor depends on employer support, understanding supervisory responsibilities and supporting a climate of health and safety. The work duties, obligations, knowledge and skills required for a “competent person” to supervise others is often poorly understood in the construction sector.

What We Heard

Discussions focused on the importance of competency of supervisors in carrying out the functions of “control of the workplace” or “authority over a worker” under the OHSA. This issue is particularly relevant in construction because work organization and the composition of work crews are often temporary or change according to the work required.

Construction stakeholders generally agreed that supervisors play an important role in supporting the culture and establishing a climate of health and safety in the workplace. Supervisors are the conduit between senior management, or an owner-operator, and workers. They also have oversight and accountability for protecting workers in construction workplaces. Stakeholders were largely unaware of MOL resources on who is considered a supervisor under OHSA, which have been available since February 2015.^{xviii}

It was thought that some issues could be addressed by providing a plain-language

explanation of the health and safety roles and responsibilities of a supervisor in construction, with practical, sector-specific examples.

Participants in the initial workshop expressed support for the creation of mandatory training for construction supervisors, beyond the basic awareness training that is currently required under Section 2 of the *Occupational Health and Safety Awareness and Training Regulation* (O. Reg. 297/13).

The construction health and safety inspectors who were consulted echoed the stakeholder sentiment that supervisors play a critical role in ensuring that health and safety requirements are in place and followed on the work site. Ministry of Labour inspectors expressed support for the expansion of existing resources to help workplace parties understand the definition, duties and responsibilities of a supervisor. The inspectors also indicated that they had periodically focussed enforcement on supervisors and their competency.

Analysis

The subject of improving training for construction supervisors was explored further in regional stakeholder meetings as well as with the Advisory Group. While the general responsibilities of supervisors under the OHSA are included in the awareness training referred to previously, this training does not include construction specific requirements or hazards.

Most felt that larger employers understand the role of supervisors and provide the necessary training and resources. Most felt

that small—and medium-size employers would benefit from guidance material and resources to address this issue.

In addition, stakeholders believed that the diversity of construction sectors and their related hazards would mean that training for supervisors would need to be sector-specific or employer-specific, as no single course would likely satisfy all situations.

COLLABORATION AND PARTNERSHIPS

Issue

Partnerships are important for developing, sharing and disseminating prevention and best-practice resources. Although partnerships exist within the current Health & Safety System (MOL, WSIB, and Health and Safety Associations (HSAs), new audiences still need to be reached. Many potential new partners in the construction sector could be engaged.

What We Heard

The Ministry of Labour heard about the challenges that many employers and workers (particularly small contractors and their workers) face in accessing health and safety information and resources. Small employers and their workers don't always have access to the kinds of touch-points through which larger construction employers and their workers typically receive health and safety information, such as union meetings, supply chain relationships or communication networks.

Stakeholders suggested that the Ministry of Labour and the Health and Safety Associations should partner with employer associations, unions, retail building supply outlets and consumer groups to address these gaps. It was suggested that these partnerships should focus on raising awareness about health and safety requirements and influencing consumer protection and choices, such as what to look for when hiring a contractor.

Collaborations might include partnerships between industry and organizations such as the Ontario General Contractors Association (Rob Ellis partner on “League of Champions”) to promote excellence in OHS; the Carpenter’s District Council of Ontario, which distributes WAH prevention and training materials to members; the Ontario Road Builders Association, which promotes worker road safety with its members, the Ontario Ministry of Transportation and the Ontario Provincial Police.

Analysis

Collaboration with other enforcement authorities, including municipalities, agencies and other ministries, could improve health and safety in the construction sector. Construction stakeholders suggested that the Ministry of Labour and the Health and Safety Associations partner with municipal building permit, licencing and new business registration offices to share enforcement information. An example of such collaboration could include information sharing between

these organizations and the Ministry of Labour (MOL) on high-risk construction work activity.

2017 ENGAGEMENT SESSIONS

Stakeholder input has been an important component of the development and initial implementation of the Construction Health and Safety Action Plan. The initial consultation provided the foundation of the plan, and the Task Groups and Advisory Groups have contributed invaluable support and direction. Before finalizing the major goals and objectives of the CHSAP, the Ministry of Labour engaged a number of stakeholders to confirm support for the overall direction and initiatives as well as determine any additional initiatives for consideration.

The Ministry of Labour presented at six regional Infrastructure Health and Safety Association (IHSA) meetings in London, Sudbury, Ottawa, Hamilton, Thunder Bay and Toronto, at two Section 21 Committees (PLMHSC and PLMSC Elec./Utility) and met with nine stakeholder groups in the Greater Toronto Area:

- » Carpenter's District Council of Ontario
- » Christian Labour Association of Canada
- » Council of Ontario Construction Associations
- » Laborers International Union of North America
- » MERIT Contractors Association

- » Ontario General Contractors Association
- » Ontario Home Builders Association
- » Progressive Contractors Association
- » Provincial Building and Construction Trades Council of Ontario

The Ministry of Labour engaged more than 250 stakeholders through 15 feedback sessions. There was overall support for the CHSAP and its goals and objectives, especially for the idea of building on a foundation of strong data and evidence.



Building on a Strong Foundation: Activities Under Way

The Action Plan builds on a strong foundation of activities already underway.

WORKING AT HEIGHTS TRAINING

The Expert Advisory Panel on Occupational Health and Safety recommended that the Ministry of Labour develop mandatory fall protection training for working at heights. In response, the Occupational Health and Safety Awareness and Training Regulation (O. Reg. 297/13) under the OHSA, was amended to include mandatory working at heights training requirements. Since April 1, 2015, employers in Ontario have been required to ensure that workers on construction projects who may use certain methods of fall protection successfully complete “working at heights” training that meets the training program and provider standards established by the CPO.

As of March 30, 2017 approximately 295,000 learners have successfully completed the working at heights training.

CONSTRUCTION SECTOR FALLS ENFORCEMENT INITIATIVE

Ontario launched an all-sector (mining, construction, industrial) falls blitz running from May 16 to July 15, 2016. Construction inspectors visited 3,034 workplaces and issued nearly 9,400 compliance orders. Along with issuing over 647 Part 1 “tickets,” inspectors also initiated more than a dozen prosecutions. Results of the campaign will be posted on the ministry website and included in the final report.

AMENDMENTS TO THE REGULATIONS GOVERNING CONSTRUCTION PROJECTS

Ontario continues to strengthen occupational health and safety requirements for the construction sector. MOL has made a number of significant regulatory amendments that support the goals of CHSAP, thereby responding to the recommendations of the Expert Advisory Panel on Occupational Health and Safety and advice from the Provincial Labour Management Health and Safety Committees for the construction and electrical and utilities sectors.¹

¹ The provincial Section 21 Advisory Committees are established pursuant to Section 21 of the Occupational Health and Safety Act. They involve tripartite discussion on health and safety issues within a specified sector, advise the Minister on health and safety matters, provide advice and exchange information on health and safety issues in workplaces and produce guidance documents dealing with hazards in the sector.

The following key amendments came into force on July 1, 2016:

- » New requirements for the safe operation of rotary foundation drill rigs under the Construction Projects Regulation (O. Reg. 213/91) (<https://news.ontario.ca/mol/en/2015/12/ontario-taking-action-to-protect-drill-rig-operators.html>). These requirements include:
 - New operational and technical requirements for the safe operation of rotary foundation drill rigs.
 - New training and prerequisite qualification requirements for rotary foundation drill rig operators.
- » Enhanced and clarified provisions relating to exposure to carbon monoxide, and other fumes and gases released from internal combustion engines.
- » Enhancing and clarifying provisions relating to the use of portable ladders.
- » A new noise regulation (O. Reg. 381/15) that extends noise protection requirements to all workplaces in Ontario (<https://www.labour.gov.on.ca/english/hs/pubs/noise/index.php>). This previously applied to only industrial, mining, and oil and gas off-shore workplaces. Employers are now required to take all measures reasonably necessary in the circumstances to protect workers from exposure to hazardous sound levels, in all sectors, including construction. MOL has released a new guideline on the noise protection requirements that apply to all workplaces under O. Reg. 381/15 (Noise) of the Occupational Health and Safety Act. This guideline is a tool for facilitating compliance.
- » Amendments to the Control of Exposure to Biological or Chemical Agents Regulation (Regulation 833), which extends the application of the regulation to construction projects and enable the future use of “codes of practice approved by the Minister of Labour” (<https://news.ontario.ca/opo/en/2016/06/regulation-and-fee-changes-coming-into-force-july-1-2016.html>).
- » On January 1, 2017, amendments to the Construction Projects Regulation to strengthen and clarify existing requirements relating to the use of suspended access equipment came into effect. (<https://www.labour.gov.on.ca/english/resources/notices.php>). Key amendments include:
 - Introducing a requirement for notifying the Ministry of Labour before putting suspended access equipment into service for the first time at a project, introducing requirements for roof plans and site-specific work plans as well as enhancing existing design, operational, technical and engineering requirements.
 - Strengthening and enhancing existing inspection, testing and maintenance requirements and introducing training requirements for workers who may use or inspect suspended access equipment.

UNDERGROUND ECONOMY RESIDENTIAL ROOFING PILOT PROJECT

The Ministry of Labour launched a Residential Roofing Pilot Enforcement Initiative on October 1, 2014, with funding support from the Ministry of Finance (MOF), in partnership with the Ministry of Government and Consumer Services (MGCS), the Canada Revenue Agency (CRA) and the IHSA. As part of the initiative, a team of construction health and safety inspectors focused on proactive inspections of residential roofers during regular hours, as well as evenings and weekends. From October 1, 2014, until March 31, 2016, the project saw 778 field inspections, directed at residential roofing work resulting in over 2,000 compliance orders and the commencement of over 250 prosecutions.^{xix} A major component of the project also focused on educating homeowners to help them understand the hazards of supporting the underground economy, as well as the obligations of employers, supervisors and workers under the OHSA. The education and outreach portion of this pilot was accomplished using two different methods: a digital media campaign with advertisements on Google and Kijiji in March 2015, and health and safety inspectors handing out information directly to homeowners.

Also, the MOL partnered with the Canada Revenue Agency to conduct parallel inspections focusing on identifying underground economy activity in real time. The MOL and CRA conducted 33 joint inspections.

Together, the advertisements attracted more than 54,000 people to the web page, and increased traffic to the Ministry of Labour website by 144%.^{xx}

RESIDENTIAL ROOFING ENFORCEMENT PILOT

Beginning May 16, 2016, the Ministry of Labour commenced the second round of the enforcement pilot continuing to target residential roofing. The aim of the pilot is to ensure that workplace parties are complying with the OHSA and applicable regulations and to inform homeowners of the obligations that employers, supervisors and workers have under the OHSA. In the case of projects where workers will be at heights, such as repairing a roof, homeowners are encouraged to ask for proof that all of those workers have completed working at heights or other fall protection training. To-date MOL's construction Health and Safety Inspectors have completed 701 field inspections, issued 1631 orders and initiated over 230 prosecutions.

Action Plan and Recommendations

Following the consultation sessions, the Chief Prevention Officer, the CHSAP Advisory Group, as well as each Task Group reviewed research, stakeholder feedback, an environmental scan of the construction sector, and risk assessments, to arrive at 16 recommendations. These recommendations form the basis of the Action Plan and will guide future work by the H&S system in Ontario to address the health and safety challenges in the construction sector. The recommendations are grouped under two overarching goals; each has three objectives:

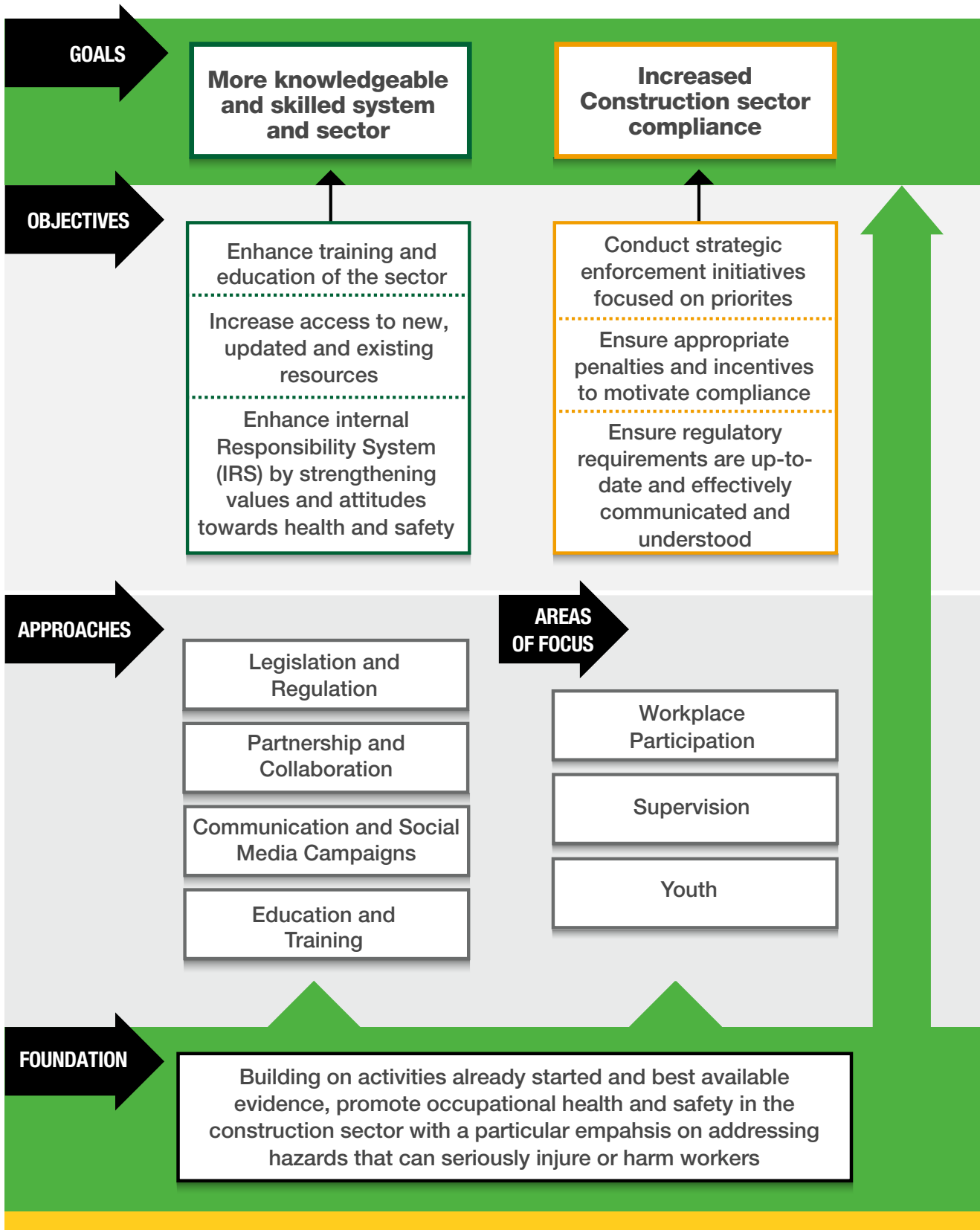
1. More knowledgeable and skilled system and sector:

- i. enhancing the Internal Responsibility System (IRS) by strengthening values and attitudes towards health and safety
- ii. increasing access to new, updated and existing resources
- iii. enhancing the training and education of the sector.

2. Increased construction sector compliance:

- iv. ensuring regulatory requirements are up-to-date and effectively communicated and understood
- v. ensuring appropriate penalties and incentives to motivate compliance
- vi. conducting strategic enforcement initiatives that are focused on priorities.

The Action Plan builds on a strong foundation of ideas that came out of the participation of stakeholders in the process. The Action Plan is iterative and will be updated regularly to reflect progress and new activities completed by the workplace accident and injury prevention system and incorporate new activities as necessary.



Goal 1: More knowledgeable and skilled system and sector

Objective 1: Enhance Internal Responsibility System (IRS) by strengthening values and attitudes toward health and safety

The IRS is the foundation for improving health and safety in the workplace because its core principle is that everyone must take action. Because employers and supervisors have the greatest control in the workplace, they must take the greatest action. During consultations, some participants said workers will be deterred from participating in IRS if the values and attitudes towards health and safety in the workplace are inadequate, which could mean workers experience reprisal if they act or raise health and safety concerns.

In construction, health and safety must be valued as much as quality of work, cost containment, completion schedules and other priorities. People in a workplace must be able to recognize the need for action because they understand the hazards associated with the work and the health and safety consequences of not acting.

Recommendations 1, 2 and 3 are directed towards creating a greater understanding of

the need for action on workplace health and safety in the construction sector and improving the values and attitudes toward health and safety in the workplace and in society.

Recommendation 1

Create a culture and climate of safety within construction by planning, creating and supporting ongoing multi-media OHS awareness campaigns that promote the importance of workplace occupational health and safety with industry stakeholders as well as consumers.

Actions:

- » The Ministry of Labour launched an awareness campaign in March 2016 to raise awareness about working at heights training requirements.
- » The messages ran for various lengths of time between March 21 and August 28, 2016, on radio, Google, Kijiji and mobile applications. The campaign generated over nearly 67.5 million impressions and over 101,000 clicks, reaching over 9.54 million unique users via Google and Kijiji and over 3 million unique users via mobile ads on cellphone applications. Radio ads ran in English and French across Ontario, with an additional 10 languages on air in Toronto.
 - Many construction stakeholders reported hearing the radio ads and were supportive of engaging consumers in the issue, while some complained to the ministry that they did not get projects because their workers had not been trained.

- » IHSA's "Keep Your Promise" mass-media campaign was launched in TTC subways and major bus lines in March 2016. It is aimed at the public and working population to change the culture of working safe. Since the start of this campaign (March 28-November 30, 2016), there have been more than 525,000 active sessions at IHSA.ca, which is a 27% increase over 2015.
- » IHSA launched a radio campaign in early 2017 reminding people of the deadline to complete CPO-approved Working at Heights training. The advertisements ran on 26 radio stations throughout Ontario.

Recommendation 2

Increase safety knowledge in the construction sector by promoting awareness of the top construction sector hazards (falls from heights, motor vehicle incidents, struck by objects, machinery) and how to control these hazards through new and improved information channels, including industry, government and other stakeholder partnerships.

Foundation:

- » As part of *Safe At Work Ontario*, the Ministry of Labour develops annual enforcement plans that focus on hazards and health and safety issues specific to workplaces for different sectors, including construction. New to the sector plans in 2016 were additional background information on hazards, as well as tools and resources relevant for those hazards.

<https://www.labour.gov.on.ca/english/hs/sawo/sectorplans/>

- » The Ministry of Labour helps build a knowledge base through the Prevention Office's Research Opportunities Program. Three of the research priorities identified align closely with OHS issues in the construction sector: high-hazard activities, small businesses, and vulnerable workers.

Actions:

- » In 2016 the ministry started to post fatality incidents and relevant prevention resources on the MOL website (<https://www.labour.gov.on.ca/english/hs/fatalities.php>).
- » In the summer of 2016, IHSA launched an initiative with a home improvement retail chain to provide health and safety information to contractors and consumers. IHSA visited a total of fifteen locations from June 29 to August 31, 2016, the majority of which employed 2-5 workers.

New and Upcoming Work:

- » With the coming into force of the new noise regulation (O. Reg. 381/15) that extends noise protection requirements to all workplaces in Ontario, there is an opportunity to build on the momentum initiated by the introduction of the new regulation. A significant part of the initiative will be the adoption of International Noise Day on April 26, 2017. The Occupational Health and Safety System will use this day to launch awareness initiatives around noise in the workplace through the promotion of education and training resources and assessment tools.

Recommendation 3

Support the role of the supervisor in creating and maintaining a culture that fosters worker participation in identifying and mitigating workplace hazards.

Actions:

- » IHSA developed an advanced training program – Communications Skills for Supervising Health and Safety – aimed at increasing supervisor competency in construction and other sectors. The program was launched in October 2016 (<https://www.ihsa.ca/Training/Courses/Communication-Skills-for-Supervising-Health-Safe.aspx>). This builds on an existing training program with the objective of going beyond technical knowledge to enhance communication and leadership skills.
- » Construction supervisor has been included as a topic in the Canadian Centre for Occupational Health and Safety (CCOHS)/IHSA web tool.

New and Upcoming Work:

- » MOL to work with partners to promote the Foundations of Safety Leadership module (<http://www.cpwr.com/foundations-safety-leadership-fsl>) to increase awareness among employers and supervisors and increase workplace participation.
- » The Workplace Participation and Supervision Task Group to commit creating resources that can be used by supervisors to provide short safety talks “tool box talks” on promoting IRS.

- » MOL to develop a leadership and worker participation toolkit for small- and medium-size construction companies to improve their health and safety performance and increase overall business performance and productivity.
- » MOL to promote employee recognition programs that encourage workers to report unsafe work practises.

Objective 2: Increase Access to New, Updated and Existing Resources

The IRS depends on individuals knowing what needs to be acted upon and what actions to take. The consultations have clearly shown that extensive health and safety resources have been created by the ministry and prevention partners, employers and labour to support occupational health and safety.

Large employers have access to such resources as a result of internal capacity or business networks. Small and medium-size employers have told us that they need more descriptive resources that are focused on the issues they deal with. Comprehensive and complex resources that focus on all the hazards in construction can be overwhelming and can distract from immediate priorities they need to focus on. Small- and medium-sized employers need greater access to “workplace friendly” resources that make

them aware of the hazards directly associated with the work they perform and how to eliminate or control those hazards. In many cases, employer and unions have worked together to produce resources specific to their sector. Many participants in the consultations expressed a willingness to continue doing so.

Recommendations 4 and 5 are directed towards raising awareness of resources available, and wherever possible, using those general resources as a foundation for developing learning resources more focused on the situations a smaller construction business might face.

Recommendation 4

Identify and/or develop “workplace friendly” resource tools focused on the top hazards in construction (falls from heights, motor vehicle incidents, struck by-object, machinery), with a particular focus on small- and medium-size businesses.

Ensure that resources are accessible, in multiple formats, languages as well as concise and easy to understand.

Actions:

- » IHSA translated their Working at Heights material into 10 languages and have pilot-tested the delivery of WAH in those languages using translators.
- » IHSA created a small business landing page on its website that shares information on resources and programs for small

employers. In the first half of 2016, IHSA promoted this in its radio advertisements, as well as in industry publications, which resulted in an approximately 280% increase in page views via the small business link.

New and Upcoming Work:

- » Develop a small business tool-kit based upon small construction employers’ priorities to help them understand their obligations and improve workers’ knowledge. Many resources currently available for larger employers can be modified and shared to meet the needs of small businesses.
- » Ministry of Labour will work with the IHSA and system partners to complete a scan and gap analysis of existing system resources in the priority areas and create new resources for identified gaps.

Recommendation 5

Build and support multi-stakeholder partnerships and distribution channels that enable better flow of health and safety resources.

Actions:

- » Through building a relationship with the City of Toronto, the City recently included MOL Notice of Project information on their website (www.toronto.ca/building), thereby ensuring that contractors and homeowners have the right information at the right time.

New and Upcoming Work:

- » MOL will explore partnering with approved training providers to utilize existing registries of learners as a means to distribute health and safety resources.
- » MOL to explore working with other municipalities to expand relationships based on the model of the relationship with the City of Toronto.
- » Partner with construction associations and labour groups to distribute resources to construction employers, supervisors, and workers.
 - Many labour and employer organizations and system partners have developed guidance and best practices information (e.g., IHSA's Electrical Construction Workers Safety Manual; Health & Safety Guide: Masonry, Tile, Terrazzo, and Allied Trades; and Concrete Finishers Health & Safety Manual) that is currently used internally, but would be of significant value to a broader audience.

Objective 3: Enhance Training and Education of the Sector

Training and education reinforces this knowledge and ensures the message is heard. Training and education takes many forms, from a classroom setting to one-on-one instruction between supervisor and worker or between workers. While a number of hazards are common in construction, no

single, comprehensive, point-in-time training program can meet all the diverse education and training needs.

The types of hazards for which training is needed are extremely diverse. The circumstances surrounding a particular hazard may vary depending on the sector and the type of work being performed. Training is most valuable when it is work-specific and occurs close in time to when the hazard is present. Training and education that occurs years before it is used is likely to be forgotten. Education and training is most effective when it matches the situations faced in a particular workplace.

Recommendations 6, 7 and 8 are directed towards training needs arising out of the diversity of hazards in construction, the entry paths of workers into construction careers, and the evolution of their careers over time.

Recommendation 6

Create a strategy for career-long health and safety learning for the construction sector.

New and Upcoming Work:

- » The ministry has drafted a Construction Health and Safety Career Training Strategy and shared the draft with the CHSAP Advisory Group for feedback. When finalized, this strategy will guide priorities from early learning in the education system (K-12, co-op and post-secondary students, etc.), career training (regulatory training requirements, apprenticeships, etc.) and career transitions (becoming a supervisor, or an employer, or starting in a new trade).

» The Expert Advisory Panel on Occupational Health and Safety recommended that the Ministry of Labour develop mandatory entry-level training for construction workers. The Ministry of Labour is reviewing feedback from consultations on a proposal that would require employers to ensure that workers performing work to which the *Construction Projects Regulation* (O. Reg. 213/91) applies complete a hazard awareness training program.

Recommendation 7

Develop stronger partnerships with the education system to reach students, teachers and employers involved in construction directed experiential learning programs.

Actions:

» The ministry has partnered with the Ontario Cooperative Education Association (OCEA), IHSA and Public Services Health and Safety Association (PSHSA) to gather occupational health and safety resources and training for teachers and to support them in communicating this information to students heading into careers in construction.

New and Upcoming Work:

» The MOL is working with Ministry of Education (EDU) regarding training requirements under the OHSA and the Regulation for Construction projects that apply to students when participating in experiential learning programs. Discussions have focused on the health and safety content of current construction technology

courses and mandatory training that would apply to all students entering into construction placements.

Recommendation 8

Work with the Ontario College of Trades (OCOT) to identify, review and enhance health and safety content of apprenticeship training standards.

New and Upcoming Work:

» The Ministry of Labour will work with the Ministry of Advanced Education and Skills Development and the OCOT to develop opportunities to include more health and safety training into apprenticeship training.

Goal 2: Increased Construction Sector Compliance

Objective 4: Ensure regulatory requirements are up-to-date and effectively communicated and understood

Ontario's progress towards strengthening occupational health and safety requirements for the construction sector needs to reach everyone in the sector. However, new or existing legislation and regulations, or amendments to existing legislation and regulations, are not always known or understood by those who need to apply them. It is important to follow through and continue communicating new measures as they come into force and to provide guidance material related to new legal measures.

During consultations, small- and medium-size employers said that it can be extremely difficult for them to understand or interpret key areas of the regulations that may apply to them, and that they would benefit from plain-language descriptions of these requirements.

Recommendations 9, 10 and 11 are directed towards creating clear explanations of new and existing safety legislation, regulations or amendments, and distributing the materials widely.

Recommendation 9

The MOL to work with H&S system partners to create plain language resource materials on high priority hazards to assist small- and medium-size employers in the interpretation of existing legislative and regulatory requirements as well as understanding what is required to comply.

Actions:

» The Ministry of Labour, Prevention Office worked with the Infrastructure Health and Safety Association and the Canadian Centre for Occupational Health and Safety to develop a web tool and mobile App that presents information on key topics in the regulation for construction projects to assist Ontario workplace to understand legislated obligations. To date 30 of the 50 identified topics have been added to the tool.

New and Upcoming Work:

» The MOL to work with system partners to create plain language resource materials to assist in the interpretation of existing legislative and regulatory requirements.

» The MOL will support the development of an information resource kit on key construction OHS issues for small and medium-size employers that can be provided by ministry inspectors. The resources will be in the form of short, plain language documents on common hazards in construction and how to control or eliminate them. Stakeholders familiar with the needs of small employers will be consulted on their development as well as encouraged to make them available through their networks

Recommendation 10

The MOL to support the development of guidance material in future when making regulatory changes to assist the construction sector in complying with new requirements.

New and Upcoming Work:

- » MOL to support the development of guidance information when regulations are amended and will work with partners and stakeholders to ensure its development as needed and appropriate.
- » MOL will work with CCOHS and IHSA to ensure that health and safety topics included in the H&S mobile app are updated should there be amendments or new requirements related to those topics.

Recommendation 11

The CPO to work with stakeholders to improve the use and design of fall protection equipment in the residential construction and roofing sectors by:

- » Exploring opportunities to work with the Ministry of Municipal Affairs to require fall-arrest anchor points on residential low-rise buildings including single family residence.
- » Collaborating with engineering and fall protection system experts to find innovative approaches to the use of existing equipment as well as the development of alternative approaches to preventing falls of workers from residential roofs.

Foundation:

- » The MOL has applied a focus to working at heights and residential roofing through WAH training, blitzes and the Underground Economy Residential Roofing Pilot Project.

New and Upcoming Work:

- » Responding to a recommendation passed at the December 8, 2016, CHSAP Advisory Group meeting, the CPO will work with stakeholders and the Ministry of Municipal Affairs to explore opportunities and implementation challenges to enhance health and safety in the residential construction sector, such as requiring fall-arrest anchor points on residential construction projects. Currently the Building Code requires installation of fall protection anchors on high rise building.
- » University level engineering students will collaborate with residential construction and roofing industry stakeholders and fall protection system experts to find innovative approaches to the use of existing equipment as well as the development of alternative approaches to preventing falls of workers from residential roofs.

Objective 5: Ensure Appropriate Penalties and Incentives to Motivate Compliance

The IRS is the most effective tool in improving health and safety in construction. However, its effectiveness relies on the right values and attitudes towards safety. Experience has shown that sufficient penalties are needed to meet the goal of specific and general deterrence; that is, motivate the offender and others to comply with the law. Penalties cannot be effective if there is a perception they will not be applied or if the consequences are too small.

In consultations, participants spoke of both the need for penalties to be significant enough to encourage compliance with minimum standards sets out in the OHSA and its regulations, in combination with positive motivators to improve health and safety performance towards excellence.

Recommendations 12, 13 and 14 are directed towards developing a continuum of penalties and motivators that will achieve at least minimum compliance by those resistant to comply and to motivate everyone to strive for workplace health and safety excellence.

Recommendation 12

MOL to explore opportunities to work with Ministry of the Attorney General and stakeholders to expand the application of

tickets to a broader range of contraventions of the construction projects regulation and seek an increase to the current fine amounts.

Actions:

- » The MOL is reviewing the current schedule of offences for tickets related to contraventions of the construction regulations and set fine amounts and considering potential amendments to the schedule of offences.

Recommendation 13

The MOL to work with stakeholders to explore the use of Administrative Monetary Penalties (AMPs) under OHSA and identify specific offences to apply them to the construction sector.

New and Upcoming Work:

- » The MOL to explore the use of AMPs and consider the penalty amounts that would be recommended under such a system and to which contraventions they would apply.

Recommendation 14

The CPO to explore opportunities to work with stakeholders to create incentives that motivates excellence in health and safety beyond minimum compliance, such as accreditation.

Actions:

- » Ontario has passed legislation that amends the OHSA to provide the CPO with authority to establish an accreditation and employer

recognition program to recognize employers with strong health and safety programs and practices.

- » This will include authority to:
 - Establish standards that occupational health and safety management systems (OHSMs) would need to meet to become accredited.
 - Approve existing or new OHSMs that meet the CPO's standards.
 - Recognize employers that have been certified by an approved OHSMs and who meet any additional criteria established by the CPO.
 - Publish the names of accredited programs and recognized employers.

New and Upcoming Work:

- » The CPO is consulting with stakeholders regarding the implementation of an accreditation program which will set standards for elements of a health and safety management system and their evaluation for the purpose of recognizing excellence in workplace health and safety. The consultation will include labour and employer stakeholders from all sectors, and will seek input on elements to include in the accreditation standard and employer recognition criteria, the implementation framework, and potential incentives.

Objective 6: Conduct Strategic Enforcement Initiatives Focused on Priorities

Enforcement activity is a check on the system. It needs to be sufficient to act as a deterrent for those who would chose not comply with the law. Because enforcement resources are finite, such enforcement needs to be strategic in its focus. It must be based upon analysis of data and enforcement experience and conducted using the best tools and techniques. Stakeholders and inspectors have told us of a variety of ways to achieve this.

Recommendations 15 and **16** are directed towards using enforcement resources as effectively as possible.

Recommendation 15

The MOL to conduct strategic enforcement campaigns in construction based on risks and high hazards for the sector on an ongoing basis.

Actions:

- » As part of Safe At Work Ontario, the Ministry of Labour develops annual enforcement plans that focus on hazards and health. <https://www.labour.gov.on.ca/english/hs/sawo/sectorplans/>
- » MOL launched a construction falls blitz running from May 16 to July 15, 2016. It took a zero-tolerance approach to noncompliance with the regulatory requirements for fall protection. One aim of the initiative was to ensure that homeowners know the working

at heights training obligations of employers, supervisors and workers under the OHSA.

- » Due to the success of the blitz, the ministry will run another cross-sector blitz in 2017–18 focusing on falls from heights.

New and Upcoming Work:

- » *Safe At Work Ontario* consultations have identified possible inspection blitzes for the construction program in 2017–18. Supervisor Awareness and Accountability will be the subject of a workplace inspection blitz and will be supported by information on the blitz and compliance resources for employers.
- » Ministry of Labour will develop inspection priorities and strategies based upon the risk assessments that were conducted for construction and residential renovations with worker and employer representatives.

Recommendation 16

Enhance information sharing within OHS system and other stakeholders to support blitzes and other targeted enforcement.

Actions:

- » MOL has initiated partnerships with municipalities to pilot a web-based application that allows municipal building inspectors to report unsafe work practices to the ministry for priority inspection response. Based on lessons learned, the ministry will expand the network of individuals and partners that will receive the app for informing ministry inspectors of priority contraventions.

- » The MOL Central West Region partnered with the Infrastructure Health and Safety Association (IHSA), the Ontario Masonry Contractors Association (OMCA, <http://canadamasonrycentre.com/>), and the Masonry Contractors' Association of Toronto (<http://www.mcat-gta.ca/>) to run their *Falls from Elevation: Scaffolding & Platform Initiative*.

- Inspectors targeted hazards that could cause falls at construction sites, such as missing protective devices, lack of appropriate personal protective equipment, or poor work practices, and checked whether employers had policies and programs in place to protect workers from fall hazards.

- » The MOL partnered with the IHSA and Electrical Safety Authority (ESA) to deliver orientation sessions for health and safety inspectors on specific electrical hazards which will be the focus of inspections in the electrical utility sector. The IHSA is engaging with clients referred by MOL inspectors during their field visits and will develop tools and training based on an analysis of orders issued by MOL during the initiative. The ESA provided a phone/tablet version of EWorksafe and is working on creating a knowledge base of industry best practices as a resource to employers, supervisors and workers.

New and Upcoming Work:


- » The MOL will explore opportunities to include additional notification requirements of high-risk construction activities, such as residential roofing.

Progress Report

 Planning

 In Progress

 Complete

 On-Going

Enhance Internal Responsibility System (IRS) by strengthening values and attitudes toward health and safety

Construction Health and Safety Action Plan (CHSAP) Activities

Status

IHSA to develop an advanced training program – Communications Skills for Supervising Health and Safety.



Working at Heights Communications Campaign to raise awareness about working at heights training requirements.



IHSA's "Keep Your Promise" mass-media campaign.



Add "construction supervisors" as a topic in the CCOHS/IHSA web tool.



IHSA to launch initiative to communicate health and safety information to consumers and contractors throughout the supply chain.



MOL, Health and Safety Associations, WSIB and other partners to prioritize noise in the workplace. A year-long campaign focused on raising awareness of harm and prevention with respect to noise is in the planning stages.



MOL to develop a leadership and worker participation toolkit for small- and medium-size construction companies.




The Workplace Participation and Supervision Task Group to commit to creating resources that can be used by supervisors.



 Planning

 In Progress

 Complete

 On-Going

Enhance Internal Responsibility System (IRS) by strengthening values and attitudes toward health and safety

Construction Health and Safety Action Plan (CHSAP) Activities

Status

MOL to work with partners to promote the Foundations of Safety Leadership module.



MOL to promote employee recognition programs that encourage workers to report unsafe work practises.



The Ministry of Labour to develop annual enforcement plans that focus on workplace hazards and health and safety issues for different sectors, including construction.



MOL to help build a knowledge base through the Prevention Office's Research Opportunities Program.




Post occurrence information on fatality incidents, and relevant prevention resources, on the MOL website following these events.



 Planning

 In Progress

 Complete

 On-Going

Increase Access to New, Updated and Existing Resources

Construction Health and Safety Action Plan (CHSAP) Activities

Status

Establish a partnership with the City of Toronto, to promote health and safety resources and information.



Translate IHSA's Working at Heights material into 10 different languages, and pilot the delivery of WAH in those languages using translators.



Partner with construction associations and labour groups to distribute resources to construction employers, supervisors, and workers.



MOL to explore working with other municipalities to expand relationships based on the model of the relationship with the City of Toronto.



MOL to explore partnering with approved training providers to utilize existing registries of learners as a means to distribute health and safety resources.



Develop a small business tool-kit based upon small construction employers' priorities.




MOL to work with system partners to complete a scan of existing system resources in priority areas and create resources where needed.



 Planning

 In Progress

 Complete

 On-Going

Enhance Training and Education of the Sector

Construction Health and Safety Action Plan (CHSAP) Activities

Status

The MOL to create a strategy for **career-long health and safety learning** for the construction sector.



The MOL to work with Ministry of Education regarding training requirements under the OHS Act and the Regulation for Construction projects.



The MOL to work with the Ministry of Advanced Education and Skills Development and the Ontario College of Trades to develop opportunities to include more health and safety training into apprenticeship training.




The MOL to partner with the OCEA, IHSA and PSHSA to gather occupational health and safety resources for teachers.



 Planning

 In Progress

 Complete

 On-Going

Ensure regulatory requirements are up-to-date and effectively communicated and understood

Construction Health and Safety Action Plan (CHSAP) Activities

Status

CCOHS and IHSA to develop a web tool to include health and safety resources to assist employers and workers in understanding what the law requires.



The MOL has focused on working at heights and residential roofing through WAH training, blitzes and the Underground Economy Residential Roofing Pilot Project.



The CPO to work with stakeholders and the Ministry of Municipal Affairs to explore opportunities and implementation challenges to enhance health and safety in the residential construction sector.



University-level Engineering students will collaborate with residential construction and roofing industry stakeholders and fall protection system experts to find innovative approaches to the use of existing equipment.



The MOL to work with partners to create plain language resource materials to assist in the interpretation of existing legislative and regulatory requirements.



The MOL to develop a resource kit on key construction OHS issues for small/ medium-size employers that can be provided by Ministry Inspectors at time of inspection.



MOL to develop guidance information when proposing regulatory changes and will work with partners and stakeholders to ensure its development as needed.




MOL will work with CCOHS and IHSA to ensure that topics included in the H&S mobile app are updated should there be amendments or new requirements.



 Planning

 In Progress

 Complete

 On-Going

Ensure appropriate penalties and incentives to motivate compliance

Construction Health and Safety Action Plan (CHSAP) Activities

Status

The MOL to review the current schedule of offences for tickets related to contraventions of the construction regulations and set fine amounts.



The MOL to explore the use of AMPs and consider the penalty amounts that would be recommended under such a system and to which contraventions they would apply.




The CPO to consult with stakeholders regarding the implementation of an “Accreditation” program.



 Planning

 In Progress

 Complete

 On-Going

Conduct Strategic Enforcement Initiatives Focused on Priorities

Construction Health and Safety Action Plan (CHSAP) Activities

Status

MOL to initiate partnerships with municipalities to pilot a web-based application that allows municipal building inspectors to report unsafe work practices.



The MOL Central West Region to partner with the IHSA, the OMCA, and the MCAT to run their Falls from Elevation: Scaffolding & Platform Initiative.



The MOL to partner with the IHSA and ESA to deliver orientation sessions for inspectors on specific electrical hazards which will be the focus of inspections.



The MOL to explore opportunities to include additional notification requirements of high-risk construction activities, such as residential roofing.



Safe At Work Ontario consultations have identified possible inspection blitzes for the construction program in 2017–18.



Ministry of Labour to develop inspection priorities and strategies based upon the risk assessments that were conducted for construction and residential renovations with worker and employer representatives.





CONSTRUCTION



The Way Forward

PERFORMANCE INDICATORS AND EVALUATION

As with every strategic plan, it will be important to evaluate whether the plan and its activities are making a difference, while at the same time monitoring indicators that show how the system is performing. Evaluating our activities will help us with future decision-making.

The Ministry of Labour has three established key performance indicators (KPIs) that will be monitored over the next five years:

1. Reduce the allowed lost-time injury rate per 100 workers by 10% over five years (through robust education, training and certification programs and enforcement).
2. Reduce traumatic fatalities per 100,000 workers by 2% over five years (through education, training, certification programs and enforcement).
3. Increase number of businesses engaged by the H&S system in Ontario by 15% over four years.

The CHSAP will measure the LTI rate as well as the traumatic fatalities rate for the construction sector as performance indicators, thereby monitoring sector-specific data that contribute to two of the Ministry's KPIs. Although changes in the rates would not be directly attributed to CHSAP activities,

CHSAP activities, together with developments and changes in the broader construction sector, contribute nevertheless to the respective rates.

Furthermore, outputs of activities performed under the CHSAP will be measured to establish baseline data and allow us to measure progress over time. Final selection of indicators will depend on data availability. Indicators could include:

- » number of new resources created as a result of CHSAP
- » number of resources accessed
- » number of resources accessed on the MOL website listing fatality incidents
- » number of workers trained under WAH
- » number of businesses with workers who have received mandatory WAH training
- » number of people trained through new programs (e.g., IHSA supervisor training program)
- » number and types of media campaigns
- » number of clicks and impressions tied to particular media campaigns
- » number of homeowners reached through media campaigns
- » number of legislative/regulation changes/updates (focus on construction)
- » number of workplaces visited (during regular enforcement initiatives as well as priority blitzes)

- » number of tickets issued (during regular enforcement initiatives as well as blitzes)
- » number of orders issued (during regular enforcement initiatives as well as priority blitzes)
- » number of summonses issued (during regular enforcement initiatives as well as blitzes)
- » number of prosecutions (as a result of regular enforcement initiatives as well as blitzes)

To measure the overall impact of the CHSAP, we must look at the two goals:

- 1.** A more knowledgeable and skilled system and construction sector.
- 2.** Increased construction sector compliance.

Developing indicators to measure the level of knowledge of skill in a system or increased sector compliance will require time and a larger conversation about data sources and access. An indicator to measure a change in knowledge and skill level in a system could potentially be derived from an initial survey that would then be repeated periodically. The number of tickets and orders issued per inspection in the construction sector could be compared over time to determine trends in compliance as well as priorities for future enforcement.

REFRESHING AND REVISING THE ACTION PLAN

The CHSAP is meant to be iterative, with a clear direction and goals to work towards, but with enough flexibility to react to developments in the field and emerging priorities. Stakeholder feedback and the input from the Advisory Group was crucial in developing the plan and will continue to play an important role as we move forward. Three meetings have been scheduled for the Advisory Group for 2017, and the Workplace Participation and Supervision Task Group has formed a sub-group that will focus on resource production and dissemination.

Conclusion

The CHSAP initiatives identified in this report are intended to promote improved health and safety on construction sites and ensure that all workers leave work healthy and safe each day. The aim is to build on initiatives which were either planned or under way when the need for a plan was recognized, while identifying new activities based on research and advice from construction stakeholders from across the province.

The Ministry of Labour will continue to work with our partners, including Health and Safety Associations, other ministries, municipalities, unions, construction associations and workplace parties, to pursue the activities identified in this report.

The development of the Construction Health and Safety Action Plan is an important step towards a more focused effort to prevent serious injuries and fatalities in the construction sector. To sustain these efforts in the long-term, the action plan will be reviewed regularly as the industry takes on new building and production processes, and changes in technologies that will have an impact on the health and safety of workers in Ontario's construction workplaces.

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- viii. WSIB, October 2015, Trends Analysis: Construction Sector. A Presentation to the Construction Advisory Committee.
- ix. Workplace Safety and Insurance Board By the Numbers 2015, Schedule 1. Rate calculations by Ministry of Labour.
- x. WSIB Enterprise Information Warehouse. Data as of March 31st of the following year for each injury/illness year. Data was extracted by Ministry of Labour and may not match data previously published by WSIB.
- xi. There are a number of data limitations which impact the ability to understand the burden of occupational disease in the construction sector. For example, occupational disease claims tend to be under-reported or reported with a long delay after the initial exposure. WSIB data provides the year in which claims were processed or approved, rather than the year of illness or death. It also provides information/trends on the types of claims which are more frequently brought forward to the WSIB.

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Ministry of Labour

**Construction Health and
Safety Action Plan**

May 2017

