

# Compliance Cheat Sheet: Confined Spaces Safety Training



## What's At Stake

OHS laws require employers to ensure that workers who work in or near confined spaces get the training they need to do it safely. Even so, confined spaces remain a Bermuda Triangle for untrained workers and would-be rescuers. According to the National Institute of Health and Safety (NIOSH), among the hundreds of victims that have lost their lives inside a confined space, 85% (!) lacked the proper safety training. Accordingly, complying with OHS training requirements is not only a legal imperative but quite literally a matter of life and death. Here are the 10 things you must do to achieve that goal.

### Defining Our Terms

The name for a space that workers need special safety training to enter vary by geography.

- “Confined space”: FED, BC, NB, NL, NS, ON, PEI, YK)
- “Hazardous confined space”: MB, SK, NT, NU
- “Enclosed space”: QC

For simplicity's sake, we'll use the term “confined spaces” to refer to these spaces.

## 1. Identify the Confined Spaces at Your Site

The first step is to recognize whether there are any confined spaces at your own site. To do that, you need to look at what's considered a “confined space” in your province. (Click [here](#) to see how the OHS regulations of your jurisdiction define “confined space.”) But while definitions vary slightly, confined spaces share the same basic characteristics, i.e., they're:

- Enclosed or partially enclosed;
- Not designed or intended for continuous human occupancy;

- Large enough for a worker to enter but restricted enough to complicate exit or delivery of first aid, evacuation, rescue or other emergency response; and
- Likely to pose a health or safety hazard to an entrant because of their atmosphere, configuration, physical conditions or the work activity performed inside.

## **2. Determine Who Needs Training**

You're responsible for ensuring that 4 groups receive proper confined spaces safety training:

- Workers you allow to enter the confined space (which we'll refer to as "authorized entrants");
- Attendants or standby personnel who remain outside the confined space near the entrance and in communication with the workers inside and summon help in case of emergency;
- Entry supervisors who oversee the entry and ensure that safety measures are carried out; and
- Personnel responsible for carrying out emergency response or rescue operations within the space.

You don't necessarily have to deliver but you do have to ensure somebody delivers appropriate safety training not just to workers but to personnel of contractors and subcontractors who enter confined spaces at your workplace.

## **3. Ensure Training Is Provided at Required Times**

Workers must receive confined spaces safety training:

- Before they enter a confined space'confined spaces safety training can't be learn-as-you-go;
- Before they're assigned duties requiring them to work in or near a confined space;
- Whenever there's a change in confined space operations that present a hazard for which the worker wasn't previously trained;
- Whenever the entry procedures change; and
- Whenever you have reason to believe the worker doesn't have adequate knowledge of the entry procedures, e.g., after involvement in a near miss incident.

All workers should also receive regular refresher training on confined space entry at least once a year, especially those who were authorized to but didn't actually enter any confined spaces in the previous year.

## **4. Ensure Authorized Entrant Training Covers All Key Points**

Training must be delivered by a qualified person and cover the hazards of the work. Upon completing their training, authorized entrants should be able to demonstrate that they're capable of:

- Detecting the hazards that may occur during entry;

- Carrying out their roles and responsibilities under the safe entry procedure;
- Properly using the required PPE and equipment;
- Communicating with the attendant or standby worker;
- Cooperating with rescue personnel; and
- Exiting from the confined space as quickly as possible if necessary.

## **5. Ensure Attendant Training Covers All Key Points**

Attendants who remain outside the confined space must be trained to perform their safety duties, including:

- Maintaining an accurate count of authorized entrants in the confined space;
- Monitoring activities inside and outside the confined space to ensure it's safe for authorized entrants to remain inside;
- Communicating with authorized entrants as necessary to monitor their status and alert them of the need to evacuate;
- Summoning rescue or other emergency services if they determine that authorized entrants need help to escape;
- Staying at their post until the entry ends or the attendant is relieved by another attendant; and
- Not going inside the confined space unless they're authorized and trained to perform rescue operations.

## **6. Ensure Entry Supervisor Training Covers All Key Points**

Entry supervisors must be trained how to carry out their safety duties, which include:

- Not letting authorized entrants enter the confined space until verifying that: i. all required tests have been carried out; ii. all required procedures and equipment are in place; and iii. rescue services are available and the means of calling for them are operable;
- Terminating the entry permit if the operations the permit authorizes have been completed or a hazardous condition not allowed in the permit arises in or near the confined space;
- Ensuring individuals who aren't authorized entrants don't enter the confined space; and
- Ensuring all safety precautions continue without interruption any time responsibility for entry operations is transferred.

## **7. Ensure Rescue Personnel Have Necessary Training**

Three of five confined spaces deaths are suffered by would-be rescuers, according to NIOSH. So, it's critical to ensure that personnel responsible for carrying out confined space emergency response and rescue are properly trained to carry out the emergency procedures. In addition, 11 jurisdictions require rescue personnel to have some level of first aid training:

### **First Aid Training Requirements for Confined Spaces Rescue Personnel**

<b>Jurisdiction</b>	<b>First Aid Training Required</b>
Federal	Basic first aid certificate
Alberta	First aid training'no level specified
British Columbia	First aid attendant trained to immobilize injured worker
Manitoba	Basic, intermediate or advanced first aider depending on hazard of operation, number of workers + workplace location
New Brunswick	i. Standard first aid certificate from Canadian Red Cross Society or St. John Ambulance; and ii. Training in artificial respiration + CPR
Newfoundland	First aid training not specifically required
Nova Scotia	First aid training not specifically required
Ontario	Training in first aid (no level specified) + CPR
Prince Edward Island	CPR
Qu�bec	First aid training not specifically required
Saskatchewan	Class A first aid qualification certificate
Northwest Territories + Nunavut	Level 1 first aid qualification certificate
Yukon	First aid training not specifically required

## 8. Verify Effectiveness of Confined Spaces Training

Just delivering safety training isn't enough. To comply with OHS laws, you must verify that trainees understand the training and have acquired the knowledge or skills it's designed to convey. Steps to ensure trainees "get it" may include requiring trainees to provide a practical demonstration of what they've learned (expressly required in AB and SK), and pass a test demonstrating their understanding of the material. Many jurisdictions also require employers to stage practice drills. Last but not least, have the entry supervisor monitor authorized entrants to ensure they're properly applying their training.

## 9. Document the Training You Provide

Keep records of the confined spaces safety training you provide in a written document that lists:

- Each trainee's name;
- The trainer's signature or initials;
- Who provided the training;
- The subjects it covered; and
- The date(s) of training.

## 10. Refresh, Reinforce & Retrain

Repeat and reinforce the training message you delivered after training ends. Ontario requires retraining at least once a year. Nova Scotia requires retraining rescue personnel once a year and retraining authorized entrants every 2 years. Retraining should also be provided more frequently in response to changes not covered by previous training or indications that such previous training isn't current or effective.