

Work Over & Near Water Drowning Protection Policy



Drowning is a leading cause of workplace fatalities and OHS violations. The starting point for safety and compliance is to create and implement a policy to protect workers who perform operations near or above water in which they're exposed to the risk of drowning. Here's a policy template that you can adapt to fit your own workplace and unique circumstances.

1. PURPOSE

ABC Company has adopted this Policy to ensure that appropriate measures are implemented to ensure that all personnel who perform work that exposes them to hazards of drowning are properly protected from those hazards in accordance with [province] *Occupational Health and Safety Regulations* ('OHS Regulations'), the *Occupational Health and Safety Act* ('Act'), the ABC Company Occupational Health and Safety Program ('OHS Program'), and other applicable requirements and standards.

2. DEFINITIONS

For purposes of this Policy:

- **'Administrative controls'** means the provision, use, and scheduling of work activities and resources in the workplace, including planning, organizing, staffing, and coordinating, for the purpose of controlling risk;
- **'Buoyancy equipment'** means a life jacket or personal flotation device as those terms are defined below;
- **'Drowning hazards/risks'** generally exist when a person is above or at less than 2'metres from a location where the depth of the water exceeds 1.2'meters over more than 2'metres in width or a location where the water flow may carry a person away;
- **'Engineering controls'** means the physical arrangement, design, or alteration of workstations, equipment, materials, production facilities, or other aspects of the physical work environment, for the purpose of controlling risk;

- **'Lifejacket'** means a device that, when worn correctly, provides a specified buoyancy that will turn the wearer face-up on entering the water, and keep the wearer in this position;
- **'Personal flotation device'** means a device intended to be worn by a person that provides a specified buoyancy and in water, supports a conscious person in an upright or backward leaning position, without any direct effort of the person;
- **'PPE'** means personal protective equipment;
- **'Practicable'** means that which is reasonably capable of being done, a standard applied in determining what safety measures to implement to control a hazard;
- **'Qualified'** means being knowledgeable of the work, the hazards involved, and the means to control them by reason of education, training, and/or experience.

3. POLICY STATEMENT

ABC Company's approach to managing workplace hazards, including drowning hazards, is to totally eliminate them. However, total elimination of such hazards may not be practicable in all situations. When total elimination is not practicable, ABC Company will take steps to minimize and control drowning hazards, which may include the use of engineering controls, administrative controls, safe work practices, and PPE, or a combination of the above.

In selecting controls, ABC Company will give preference to measures that control the hazard at the source; second choice will be accorded to measures that control the hazard along its path to the worker; PPE and other measures that control the hazard at the worker will be used as a measure of last resort and/or as a means of supplementing and backing up controls implemented at the source and along the path.

Where PPE is determined to be necessary to deal with hand and other hazards, workers affected by the hazard requiring use of PPE must understand what the PPE does to protect them, what its limitations are, and how to properly use, inspect, and maintain it before engaging in operations requiring them to use the PPE.

4. SCOPE OF POLICY

The intent of this Policy is to ensure that **all workers** engaged to perform work for ABC Company at its work sites who may be exposed to drowning hazards are effectively protected, including:

- Full- and part-time workers paid by ABC Company;
- Temporary employees placed by an outside agency to work at the site;
- Contract labourers engaged to perform work at the site;
- Volunteers who work at the site for free; and
- Workers employed by prime contractors, contractors, and subcontractors to perform work at the site under a contract with ABC Company.

5. WHEN LIFEJACKETS & PERSONAL FLOTATION DEVICES ARE REQUIRED

Workers exposed to drowning hazards must wear a lifejacket or personal flotation device, including but not limited to workers who work alone or in isolation where emergency response and rescue cannot be immediately effected. Such equipment must be used in combination with an appropriate fall protection system where there is a hazard of drowning from falling into water, from other than a boat. Lifejackets or personal flotation devices are not required if:

- Safety nets, guardrails or other safety measures are in place that will protect the worker from drowning; or
- The water is too shallow to allow for the lifejacket or personal flotation device to operate effectively and reasonably.

6. COMPANY TO PROVIDE LIFE JACKETS & PERSONAL FLOTATION DEVICES

Where workers are required to wear life jackets or personal flotation devices at the workplace, ABC Company will furnish the appropriate equipment to workers at no cost to them.

7. LIFEJACKET & PERSONAL FLOTATION DEVICE EQUIPMENT STANDARDS

Where lifejackets and personal flotation devices are required, they must meet be properly marked as having been approved by Canada Transport or an agency permitted by Canada Transport to approve them or as meeting the other standards listed in the OHS Regulations as applying to the particular equipment.

8. INFLATABLE EQUIPMENT

If inflatable lifejackets or personal flotation devices are used, they must be inspected and maintained in accordance with the manufacturer's instructions and recommendations, and records of all inspections and maintenance must be maintained for the life of the lifejacket or personal flotation device.

9. RESCUE PROCEDURES

Where workers are exposed to drowning hazards, ABC Company will develop and implement procedures to ensure swift and effective assistance and rescue that account for:

- The temperature, depth and flow of the water;
- Water traffic or other conditions that might obstruct immediate rescue efforts;
- The distance to the rescue boat;
- The distance to reach the worker in the water;
- Any projections or objects beneath the surface;
- Means of communication;
- Any visibility issues;

- The time of day;
- Visibility;
- Any adverse weather conditions; and
- The required rescue equipment.

The rescue procedure must be carried out by qualified personnel using the required protective and other equipment. The written rescue procedure will be kept readily available at the workplace where the drowning hazard exists and be practiced via the staging of drills.

10. RESCUE EQUIPMENT

The following rescue equipment must be provided and in place at any site where workers are exposed to drowning hazards:

- An alarm or notification system to signal the need for rescue;
- A rescue boat that is motorized if the water is likely to be rough or swift;
- A buoyant apparatus attached to a nylon rope of at least 9 mm in diameter and 15 mm in length that's equipped with a life ring or buoy attached to 30 metres of rope and a boat hook.

11. INSTRUCTION & TRAINING

Workers required to use lifejackets or personal flotation devices will receive adequate training and instruction from a qualified supervisor or other trainer in:

- The correct use, limitations, and maintenance of the equipment; and
- The safe work procedures that apply to operations or work requiring use of the equipment.

12. MONITORING

Steps will be taken to monitor, review, and enforce this Policy, rescue procedures and proper use of lifejackets, personal flotation devices and rescue equipment including via:

- Addressing the equipment as part of monthly workplace inspections;
- Observations by workers;
- Providing extra training, instruction, and support for workers who need or ask for it;
- Where necessary, disciplining workers for violations.

13. PRIME CONTRACTORS, CONTRACTORS & SUBCONTRACTORS

All prime contractors, contractors, and subcontractors hired to perform work at an ABC Company workplace requiring the use of lifejackets and personal flotation devices will be notified of and required to comply with the terms of this Policy

and applicable safe work and rescue procedures.

Prime contractors may follow the terms of either this Policy and the applicable safe work and rescue procedures developed by ABC Company or alternative policies and procedures that meet the requirements of the Regulation, are coordinated with, and provide at least equivalent protection as ABC Company's Policy and procedures to workers performing the work the prime contractor controls.