

Working at Heights Procedure

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Office of the Chief Risk Officer

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Version Control Table

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1. Document Background

Purpose and scope of document

The Working at Heights Procedure (hereafter the Procedure) outlines the University of Ottawa (also known as “uOttawa”) procedure for working at heights within uOttawa premises.

The procedure applies to work performed at uOttawa or under the supervision or control of a uOttawa employee and is intended to serve as a reference for all stakeholders at uOttawa.

The procedure does not outline all the independent requirements and potential risks or challenges specific to any projects, workspaces, or situations, but rather is intended to serve as a framework to build a fit-for-purpose approach for managing the applicable risks.

Terms and definitions

Refer to the [OHS Glossary](#) for the OHS terms and definitions that apply to the documents within the management system.

Responsibilities

The responsibilities of all parties, including supervisors and workers, are detailed in the [General OHS Program Manual](#) and [Administrative Procedure 14-1](#) (Internal Responsibility Procedure for Health and Safety Issues).

In addition to the roles and responsibilities outlined in Procedure 14-1, additional responsibilities specific to this procedure include:

Supervisors

- Complete, document, and retain records of Hazard Identification and Risk Assessments (HIRA) for working at heights hazards
- Select the most appropriate method of fall prevention and/or fall protection to protect the employee
- Acquire the necessary equipment for working at heights
- Train the employee in proper equipment use
- Develop a written rescue plan for working at heights situations
- Ensure that the program is followed and that employees accept their obligation to follow the rules to protect themselves
- Document and retain records of employee education and workspace inspections

Workers

- Follow the proper procedures for working at heights
- Use proper equipment and personal protective equipment, as required
- Take all training provided and implement fall protection

Facilities

- Ensure the proper and regular certification of all anchor points located on University of Ottawa premises

- Provide Protection Services with an updated version of the anchor point locations

Contractors and subcontractors

- Provide their own fall protection equipment
- Ensure that this equipment meets University requirements and other applicable regulations
- Be fully trained on the use of fall equipment
- Comply with uOttawa procedures and safety requirements

Reference documents

- [General OHS Program Manual](#)
- [Hazard Identification and Risk Assessment Procedure](#)

2. Procedure

Procedural Steps

The following procedural steps **must be followed** when planning for or performing work at heights:

1. Perform a workplace hazard identification and risk assessment (HIRA)
2. Identify the required fall protection devices or systems
3. Procure, inspect, and provide the applicable fall protection devices or systems
4. Verify that all personnel engaging in the work are properly trained
5. After completing work, maintain and store all fall protection devices or systems and documentation

Additional steps may be required based on the project or work scope.

STEP 1 Perform a workplace hazard identification and risk assessment (HIRA)

Key activities

- Conduct a preliminary qualitative survey to identify the work hazards present, which will include reviewing existing HIRAs and the standard procedures in place
- If the hazard(s) of the specific work have not been previously assessed by completing a HIRA or by designing an equipment/activity-specific procedure (that includes the outcome of a HIRA), conduct, document, and retain records of a HIRA with reference to the [Hazard Identification and Risk Assessment Procedure](#)
- Conduct a survey of workspace to identify elevated work platforms that are greater than 3 metres (10 feet) in height above ground; if the HIRA determines that work platforms that are under 3 metres high also require fall protection, include them in the overall list of elevated work platforms
- Identify requirements for fall protection systems and devices

- When you identify hazards, you must also define the measures needed to effectively eliminate or mitigate the risk, using the appropriate methodology

Contextual Details

Supervisors of projects and workspaces within uOttawa premises shall identify and evaluate current and potential elevated workspaces and fall hazards at the site through a preliminary qualitative survey. The survey shall consult workers and relevant committee(s) to identify additional hazards that may be present.

The survey shall include an evaluation for fall and elevated workspace hazards including, but not limited to:

- Floor openings and holes
- Wall openings and holes
- Roofs
- Ladders (fixed and portable)
- Elevated work platforms (e.g., crane bridges, scaffolding, open sides lofts, etc.)

Based on the findings of the survey, the elevated workspaces and fall hazards identified shall be addressed by:

1. Identifying an existing assessment of the work hazard(s) and reviewing the HIRA and associated standard procedure to mitigate the hazard risks.
2. If an assessment or standard procedure does not exist already, conducting a HIRA according to the [Hazard Identification and Risk Assessment Procedure](#)

Fall protection deficiencies identified through the initial and ongoing assessments shall be prioritized and appropriately addressed. Fall areas include fall heights that are greater than 3 meters (10 feet); however, there may be situation(s) identified in the HIRA where fall area heights are less than 3 meters (10 feet). The HIRA will help identify the proper control devices to be implemented in each situation. Each fall area shall be prepared and engineered to support the mandatory fall protection systems, such as anchor points. Ongoing assessments shall be conducted at least once a year or whenever the scope of work or physical workspace has changed significantly.

Fall protection requirements identified during the assessment shall be documented and communicated to the appropriate parties. Documentation shall meet the requirements outlined in the [General OHS Program Manual](#).

STEP 2 Identify the required fall protection devices or systems

Key activities

- Follow the hierarchy of fall protection controls to determine the type of fall protection system(s) and device(s) needed

Contextual Details

Hierarchy of Fall Protection

The fall protection hierarchy must be used when choosing methods to eliminate or control fall hazards. The following steps are listed in the order in which they should be considered.

Table 1: Fall protection hierarchy and descriptions.

Fall Protection Type	Details
1 Elimination	The safest, most effective protection is to eliminate the risk complete. Assess and determine if the work can be performed in a way that does not require personnel to work on an elevated platform.
2 Collective Fall Protection	Where fall hazards cannot be eliminated, permanent or temporary guardrails or handrails form a protective barrier around an opening or edge to prevent a fall to a lower level. This type of solution is a collective solution, i.e., a solution that protects all workers at once. Collective systems are passive and do not require users to do anything (such as put on a harness or secure a lanyard to an anchor point), thereby leaving much less room for human error.
3 Fall (Travel) Restraint	After eliminating fall hazards and installing guardrails, a fall restraint system is next in the fall protection hierarchy. Fall restraint systems prevent a worker from falling by restricting travel or position. When restricting travel, workers are attached to a fixed-length line that prevents them from travelling too close to an opening or edge. Personal fall arrest equipment (harnesses, lanyards, and anchor points) stops the worker from reaching the edge: this configuration, a type of “tying-off”, prevents the user from falling in the first place.
4 Fall Arrest	When a fall restraint system is neither practical or possible, the next level of protection is fall arrest. A fall arrest system (including a harness, lanyard, lifeline, rope grab, and most importantly, an anchor) protects a worker after a fall by stopping them from hitting the surface below. Fall arrest systems use the same equipment as fall restraint, but in this situation, the fall protection equipment does not engage until after a fall occurs. When it engages, the equipment slows the worker’s descent, bringing them to a safe stop. A rescue plan is needed. If a person who has fallen is not rescued quickly (sometimes in a matter of minutes), they could suffer suspension trauma that could result in serious health issues, including amputations or death.

STEP 3 Procure, inspect, and provide the applicable fall protection devices or systems

Key activities

- Procure the appropriate fall protection devices and systems based on proper performance standard certification

- Identify a safety zone and implement a “buddy system” when using fall protection devices or systems
- Document the inspection of fall protection devices and systems before their use and at regular intervals
- Obtain a list of roof anchor locations from Facilities to identify roof anchor points (if applicable)
- If a fall arrest system will be used, establish a working-at-heights rescue plan

Contextual Details

The fall protection systems and devices purchased shall have proper performance standard certification.

The University of Ottawa shall provide fall protection devices to all uOttawa employees as required. Contractors must provide their own fall protection devices.

The following list outlines key fall protection systems that shall be used wherever appropriate:

Table 2: Fall protection system details.

Fall Protection System	Details
Collective Fall Protection	Design and use of a collective fall protection system shall be performed by a competent person and in accordance with the applicable regulations. Such systems shall have regularly documented inspections to ensure proper functionality. Collective fall protection may include, but is not limited to: <ul style="list-style-type: none"> • Guardrails (barrier) • Mobile guardrails for deck laying
Fall (Travel) Restraint	Used where work must be done within 2 meters (6 feet) of an open, unprotected edge that presents a fall hazard, travel-restraint systems do not permit a worker to approach the fall hazard zone. <ul style="list-style-type: none"> • A travel restraint system shall consist of a full body harness with adequate attachment points • The full body harness shall be attached by lanyard and lifeline to a fixed support that meets the requirements of the building code • The travel restraint system shall be inspected by a competent worker before each use • If a component of the travel restraint system is found to be defective on inspection, the defective component shall immediately be taken out of service, reported, and investigated. Upon completion of reporting and investigation, faulty devices shall be destroyed or rendered unusable
Fall Arrest	<ul style="list-style-type: none"> • A full body harness is required as part of the fall arrest system

Fall Protection System	Details
	<ul style="list-style-type: none"> • The location of fixed anchor points generally can be found on the building plan located in the mechanical room at the entrance to the roof. If the plan is not present or anchor points are not identified, please contact Facilities • A rescue plan must be completed for all work using a fall arrest system • Fall protection equipment involved in an incident (e.g., arresting an actual fall) shall not be re-used
Safety Nets	A safety net system must be designed by a professional engineer. The system is installed below a work surface to protect any location where a fall hazard exists. This system is rarely used at uOttawa.

Inspection

All components of a fall protection system must be regularly inspected by the user and prior to every use. An inspection serves to identify potential deficiencies, damages, or defects in the equipment.

- An inspection must include a review of full-body harnesses, lanyards, rope grab, lifelines, and anchors
- All fall protection devices must be used, maintained, and stored in accordance with the manufacturer's recommendations
- All personal fall arrest harnesses shall be properly fitted to the user according to the manufacturer's instructions
- Damaged or defected fall protection devices shall be removed from service, reported to the supervisor, investigated to determine the reason for the damage/defect, and destroyed such that they cannot be used again

Safety Zone

Whenever work at heights is performed, a safety zone must be established below the workspace to ensure that persons and/or equipment are not exposed to the hazard of falling objects.

Buddy System

Any workers participating in any project or workspace where working at heights will occur shall implement a buddy system by which the second party can act as a call person and summon assistance in the event of an emergency.

Roof Anchor Points

Roof anchor points shall be used whenever installing fall protection devices onto buildings. Facilities maintains the anchor points and inventory of locations. A copy is available at Facilities.

In addition, a map showing the location of roof anchor points is posted in mechanical rooms/penthouses at the top of University buildings.

STEP 4 Verify that all personnel engaging in the work are properly trained

Key activities

- In addition to basic OHS training outlined in the [OHS Program Manual](#), verify that all individuals exposed to fall hazards have completed an established training program, as instructed by a list of qualified trainers maintained by the OCRO
- Ensure proof of training is available through documentation and included in the hazard identification and risk assessment

Contextual Details

All personnel participating in or authorizing any activities involving fall protection or working at height shall receive specific fall protection training such that they acquire the competence, knowledge and skills necessary for the safe and comprehensive performance of the duties assigned. Specifically, those required to work at elevated height shall be trained to:

- Recognize the hazard(s)
- Understand and have the skills required to effectively use required fall protection systems and devices

Every project and workspace where stakeholders are exposed to fall hazards, even for rare or occasional situations, must establish and enforce a training program for working at heights. The program shall include documentation of completed training, frequency of refresher training if applicable, identified fall hazards, and control devices implemented.

Workers on projects that use any of the following methods of fall protection must complete a working at heights training program before they can work at heights:

- Travel restraint systems
- Fall arrest systems
- Safety nets

A list of qualified trainers is maintained by the Office of the Chief Risk Officer and can be obtained upon request. Additionally, [basic training](#) for work conducted from ladders and step stools at nominal heights (i.e., less than 3 meters (10 feet)) is also available.

STEP 5 Maintain and store all fall protection devices or systems and documentation

Key activities

- Document fall protection devices and system storage and maintenance
- Conduct regular device and system maintenance as necessary

Contextual Details

All fall protection devices and systems shall be documented for each workplace to detail the following elements:

- Owner

- Brand and system name
- Procurement date
- Approval date
- Last and next inspection date for maintenance
- Storage location
- Area of use (where applicable)

A regular maintenance schedule must be established for all fall protection devices and systems to ensure proper and safe function and no defects.

All fall devices and systems must be further inspected annually. Inspections must be documented and kept. Documentation must meet the requirements outlined in the [General OHS Program Manual](#).

Appendix 1: Emergency Procedures

High Elevation Rescue

A written emergency rescue plan must be developed prior to working at heights. The general plan provided is to be further customized by the supervisor. A rescue plan that is appropriate in one circumstance may not be suitable in another. Ensure that all hazards unique to the work and work environment have been considered.

In situations involving high-elevation rescues on uOttawa premises, these procedures inform members of the University community of the proper procedure.

1. Request for the Technical Rope Rescue Team (TRRT) of the Ottawa Fire Department

The TRRT is trained to carry out rescues. This team will assume command of the situation and direct the rescue. The type of response and rescue procedure will depend on the nature of the accident/incident.

Please note that the Technical Rope Rescue Team will take at least 5-to-10 minutes to arrive on site. It is critical that the actions outlined be followed to ensure a safe rescue and prevent further injury or worsening of the situation.

2. Refer to the General Emergency Rescue Plan

Once you have contacted the Technical Rope Rescue Team, use the Emergency Rescue Plan as a guiding tool.

Appendix 2: Regulatory and Additional Minimum Requirements

The University of Ottawa requires that persons working at height must receive training (e.g., working-at-height training) and implement proper fall protection methods if they are exposed to:

- A potential free-fall greater than 3 meters/10 feet; or
- A fall more than 1.2 meters/4 feet if the work area is used as a path for a wheelbarrow or similar equipment; or
- If work at a height includes work on roofs at an angle; or
- If work at a height occurs on a flat roof in circumstances where adequate fall prevention measures are not provided

Persons should never be required or allowed to perform any duties that:

- Require the person to get closer than 2 meters to an unprotected edge, platform, or walkway of any building without hazard controls
- Use elevated equipment unless the employee is properly trained and secured from falling

Special considerations must be implemented if employees are exposed to falling through any openings in a surface or into operating machinery, water, or another liquid.

Everyone, even those who do not usually work at heights, must have appropriate training and wear protective equipment if they are to perform activities described previously.

In circumstances when a worker cannot be secured to a fixed support, another work method must be used, for example, a lifting device. Note that the use of a lifting device also requires specialized training.

Fall Protection Device System Checklist

Full-Body Harness

- Inspect the harness for fraying, kinking, loose/broken stitching
- Inspect the buckles for any damage

Webbing

- Inspect the dorsal “D” ring for any damage
- Inspect the crossover plate for any damage

Lanyard

- Inspect the lanyard for fraying, kinking, loose/broken stitching, or signs of deployment
- Check hardware for damage, rust, cracks, torn stitching, fall indicators, etc.

Lifeline

- Inspect fibre rope for fraying, burns, kinking, cuts, tears, etc.
- Check retractable lifelines for smooth operation and functionality

Rope Grab

- Inspect rope grab for damage, signs of stress, etc.
- Check functionality

Anchor Point

- Inspect anchor point for damage, signs of stress, etc.

Fall prevention

The best protection is to prevent falls from happening. Fall prevention uses physical means to keep workers away from situations where they might fall. Fall prevention includes:

1. Proper use of worksite access equipment, such as ladders and scaffolds.

- Refer to [Safety Sheet 2 – Ladders and Stepladders](#)

2. Protective covers over floor and roof openings. Protective covers must be:

- Secured in place, and
- Built to meet the structural requirements for loads that apply to floors and roofs, as set out in the Building Code

3. Visual warnings

- Visual warnings can include but are not limited to: signs or tape; cones or boulders; paint or chalk; bump lines

4. Physical barriers

- Physical barriers include but are not limited to: handrails, fencing, guardrail systems

Guardrails

Guardrails must be installed in the following areas:

- Around the perimeter of an uncovered opening in a floor, roof or other surface to which a worker has access
- At an open side of
 - A raised floor, mezzanines, balcony, gallery, landing, platform, walkway, stile, ramp or other surface, or
 - A vat, bin or tank, the top of which is less than 107 centimeters above the surrounding floor, ground, platform or other surface
- Around a machine, electrical installation, place or thing that is likely to endanger the safety of any worker

A guardrail shall:

- Have a top rail located not less than 91cm and not more than 107cm above the surface to be guarded
- Have a mid-rail
- If tools or other objects may fall on a worker, have a toe board that extends from the surface to be guarded to a height of at least 125mm
- Be free of splinters and protruding nails

- A guardrail shall be constructed to meet the structural requirements for guards set out in the Building Code

Note: When preventative measures are not feasible, such as when workspaces are a rooftop or mobile scaffold, adequate fall protection must be provided for each exposed individual working at heights.

Appendix 3: General Working at Heights Rescue Plan

Working at Heights General Rescue Plan

The University of Ottawa strongly encourages the uses of fall prevention measures. Note that **in situations where fall protection (i.e., a fall arrest harness) is required, a rescue plan is mandatory prior to the start of work**. All users must be familiar with the rescue plan applicable to the work. This rescue plan below may require modification based on the individual situation. The supervisor is responsible for ensuring that the rescue plan is appropriate to the situation and communicated to everyone.

It is recommended that harnesses be equipped with orthostatic intolerance (suspension trauma) relief straps and that users be aware of their purpose and trained on their use.

PURPOSE

A rescue plan is intended to quickly and efficiently rescue a worker who has fallen and is suspended in a fall arrest harness. The rescue must be undertaken promptly because the worker:

- May have sustained an injury as a result of the fall
- May sustain orthostatic intolerance (suspension trauma; pooling of blood in lower limbs or parts of the body)
- May become agitated or panic as a result of the situation
- May still be in danger as a result of risks that arose, or were created, by the incident

PRIMARY EMERGENCY PLAN

If a worker is suspended by a fall arrest harness and lifeline:

1. Call Protection Services at ext. 5411 or 613-562-5411
2. Indicate that a worker is suspended in a fall arrest harness and requires immediate assistance. The caller should specify:
 - The location of the suspended worker, including the name of the building and approximate location (i.e., west side of building near XYZ), approximate distance from the ground and position relative to the building)
 - Whether the suspended worker is inside or outside the building
 - The type of work the worker was performing (if known)
 - The worker's condition (i.e., responsive/unresponsive, visibly injured, etc.)
 - The length of time the person has been in the situation (if known)
 - The additional risks associated with the area (i.e., mechanical, physical, etc.)
3. Protection Services will immediately contact 911 and inform the dispatcher that a worker is suspended via a fall arrest harness. Assistance from civic authorities is required (including fire and ambulance). Protection will request assistance from the Ottawa Fire Department's Technical Rope Rescue Team (TRRT). Note that the TRRT will take approximately 5-to-10 minutes to arrive on campus. **It is critical that immediate action be taken to minimize further injury to the suspended worker and ensure a safe rescue. Refer to *Secondary Rescue Procedures*.** Provide information in paragraph 2 to the 911 dispatch

4. Maintain communication with the suspended worker
5. Protection Officers will:
 - Secure the area, including access to the incident scene and the area below the suspended worker. All non-essential personnel will be cleared from the area
 - Escort emergency personnel to the incident scene
 - Notify emergency personnel of the actual/potential risks at the scene or direct them to the proper individuals (i.e., supervisor, facility manager, etc.)
 - Facilitate access for emergency personnel
 - Notify Facilities and request that Facilities personnel shut down equipment/processes (if/where necessary)
 - Make available to emergency personnel the “Roof Anchor Point Location by Building” binder. The binder shows the location of the roof anchor points and is available in in the Architectural Trades workshop and Housekeeping Office at Facilities. Additionally, most mechanical rooms that provide access to a roof have a roof plan showing the location of the roof anchor points
 - Provide additional support to workers, emergency personnel, and other campus departments while the emergency plan unfolds
 - Activate emergency notification procedures, including but not limited to:
 - Notify the Office of the Chief Risk Officer (OCRO) of the situation if any death or critical injury occurs
 - OCRO will notify advise the Facilities Health and Safety Officer
6. If the worker is conscious and equipped with suspension trauma relief devices, the worker will deploy the relief device(s)

SECONDARY RESCUE PROCEDURES

The following procedures have been provided as potential rescue methods for a suspended worker. Persons executing a rescue must be properly trained in the use of any of these methods. Protection Services must still be contacted in any instance; refer to the action in the *Primary Emergency Plan*. The site supervisor (or person witnessing a suspended worker) assumes primary control of the situation until Protection Services arrives.

The following rescue procedures are presented in hierarchal order.

Elevating Work Platform Rescue

If an elevating work platform (i.e., a scissor lift, articulating (genie) boom, etc.):

- Is available on site
 - Is capable of reaching the suspended worker
 - Is of sufficient capacity, and
 - Personnel have appropriate training to operate the elevating work platform:
1. Bring the elevating work platform to the incident scene
 2. If the worker is conscious, raise the platform to reach the suspended worker. If the worker is unconscious, a second, trained worker will don a harness, tie off to the platform, and provide assistance to the suspended worker
 3. Position the platform section of the elevating work platform below the worker. Raise the platform to provide slack to the suspended worker’s lanyard. Disconnect the suspended worker’s lanyard when safe to do so. When the suspended worker is safely on the platform, re-attach the lanyard to an appropriate anchor point on the platform of the lift
 4. Lower the worker to a safe location and administer first aid. Treat the worker for suspension trauma

and any other injury

5. Emergency services (fire, ambulance, etc.) should have arrived on scene; provide an account of the situation, including a summary of information provided to Protection Services

Alternate Rescue Procedure

If the rescue procedures above are not suitable or available in a situation involving a suspended worker, the supervisor of the worker is responsible for developing, communicating to, and training workers on a rescue procedure appropriate for the work. If assistance is required, please consult the Health, Safety, and Risk Manager and/or the Office of the Chief Risk Officer.

ORTHOSTATIC INTOLERANCE (SUSPENSION TRAUMA)

Orthostatic intolerance occurs when blood from the body pools in the lower limbs; it can lead to dizziness, unconsciousness and death. This condition is commonly referred to as suspension trauma and can affect workers suspended in fall arrest harness for short periods of time. Suspension trauma can occur in as little as 3 minutes; if action is not initiated, the risk of injury is significantly increased.

Signs and Symptoms

The following signs and symptoms are associated with suspension trauma:

- Feelings of faintness/nausea
- Shortness of breath
- Sweating
- Paleness
- Hot flashes
- Increased/decreased heart rate
- Low blood pressure
- Blurry/loss of vision

It is vital that emergency personnel be contacted immediately in any situation that involves a worker suspended from a fall. In the event of suspected suspension trauma:

- Once rescued, do not allow the worker to lie down; place them instead in a semi-sitting position until paramedics arrive
- Check ABCs (airway, breathing and circulation)
- Check for additional injuries
- Provide oxygen (if possible)
- Transfer to paramedics/ambulance. Notify them that the worker sustained a fall in fall arrest harness and may have suspension trauma

POST-RESCUE PROCEDURE

All non-essential personnel are to remain available in a designated safe zone until otherwise notified by Protection Services.

Protection Services secures the scene. The scene is not to be further disturbed except to:

- Save life or relieve human suffering
- Maintain an essential public utility service or a public transportation system; or
- Prevent unnecessary damage to equipment or other property

The supervisor of the worker initiates an investigation into the incident. The Facilities Health and Safety Officer, Facilities Risk Manager, and Office of the Chief Risk Officer will provide assistance. Anyone witnessing the incident may be asked to provide a statement or witness account of the incident.

- All material (i.e., lifelines, harnesses, rope grabs, anchor points, etc.) involved in the incident must be quarantined. The equipment will be thoroughly inspected following the incident and will be removed from service
- A debrief of the incident and rescue procedure will be conducted. What can be improved/modified?
- The supervisor will write the investigation report of the incident and provide the report to Health, Safety, and Risk Manager and Office of the Chief Risk Officer. The report shall include all related documented statements from affected workers and witnesses, photographs related to the incident, as well as all key information, such as dates, time, weather, general site conditions, and specific accident locales including sketches of the immediate incident area, complete with measurements (if applicable)