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HEALTH AND SAFETY ADVISORY

Sanitary Conditions on Construction Sites

On construction sites, workers may have to deal with unsanitary toilet and clean-up facilities. Maintaining proper hygiene procedures and facilities on a worksite is an important way to prevent the spread of infectious diseases. It is also required under Ontario health and safety law.

This advisory reviews the risks of having poor sanitary conditions, suggests ways to prevent or control those risks, and outlines the legal requirements and workplace responsibilities for having proper hygiene practices and clean-up facilities on a construction site.

Health Risks

Poor sanitary conditions on site increase the risk of spreading infectious diseases. It can allow for the transmission of viruses, bacteria, and blood-borne pathogens. Examples include:

- Hepatitis A
- Hepatitis C
- COVID-19
- Influenza
- E. coli
- Norovirus.

Some workers may avoid using unclean facilities altogether. Instead they may wait to use the washroom and wash their hands until they get home. Holding off using the washroom can negatively impact a worker's health:

- Workers who are trying to avoid using the washroom may drink less fluids during the day. This can increase their risk of dehydration, especially when doing heavy, physical labour and working in hot, humid environments. Dehydration can cause a heat-related illness or cognitive impairment, which can lead to a workplace injury.
- Workers who avoid using the washroom for long periods of time may develop gastrointestinal health issues. The result can include incontinence (i.e., loss of bladder control), kidney stones, a stretched bladder, and physical pain or discomfort.
- Women who avoid using the washroom for long periods of time are at increased risk of getting a urinary tract infection (UTI).
- Workers who avoid using the washroom may wash their hands less frequently or improperly. This can increase their risk of spreading germs and bacteria to others on site.

Legal Requirements

Under the Hygiene section of the Construction Projects regulation (O. Reg. 213/91, s.28–30), workers on a site must have access to:

- Potable drinking water
- Toilets
- Urinals
- Clean-up facilities.

Toilets

Toilets must be one of the following types:

- Water-flush toilets that are connected to a sanitary sewer.
- Water-flush or chemical-flush toilets that if not connected to a sanitary sewer are equipped with a trap or a positive seal separating stored waste from the bowl.

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Each toilet facility must be kept in good repair at all times and have:

- A toilet seat with an open front
- A toilet paper holder and an adequate supply of toilet paper
- Privacy and protection from weather and from falling objects
- A self-closing door, lockable from the inside
- Natural or artificial light
- Adequate ventilation (and heat, if possible).

If intended to be used by female workers, separate facilities must be provided unless toilets are for use by only one person at a time. Separate facilities must have signs to indicate males only and females only. Female facilities must have a disposal receptacle for sanitary napkins.

Urinals

For portable single-unit toilet facilities that are intended for male workers, there must be at least one urinal for each toilet.

For a multiple water-flush toilet facility intended for male workers, water-flush urinals may be substituted for a maximum of two-thirds of the required number of toilets (see table on page 3).

Clean-up facilities

Clean-up facilities must be equipped with:

- Wash basins with running water (hot *and* cold, where possible). If it is not reasonably possible to have a wash basin with running water at a clean-up facility, both of the following shall be provided:
  - A means of cleaning hands.
  - An alcohol-based hand sanitizer containing a minimum of 60 percent alcohol.
- Either paper towels and waste receptacles, or a hand dryer.

Workplace Reponsibilities

Under the *Occupational Health and Safety Act* (OHSA), employers, owners, constructors, and supervisors are **legally** required to protect the health and safety of workers. This includes protecting them from infectious diseases.

General health and safety responsibilities for all workplace parties on a site are listed below.

Constructors

- Ensure that toilet and clean-up facilities are provided or arranged for workers before work starts at a project and that workers have reasonable access to these facilities.
- Inform workers of the location of the facilities and post the location in a conspicuous place at the project, if it is practical to do so.
- Keep at the project a record of when the facilities were serviced, cleaned, and sanitized.

Employers

- Inform, instruct, and supervise workers on the proper clean-up procedures when using the facilities
- Inform workers about the importance of hand washing and maintaining sanitary conditions.
- Ensure that workers follow the proper clean-up procedures and report any hazards or unhygienic conditions.
- Protect the health and safety of workers on site. This includes providing information, instruction, and supervision about infectious diseases, health risks, and associated hazards.
- Report all instances of occupational illness to the Workplace Safety and Insurance Board (WSIB, the Ministry of Labour, Immigration, Training and Skills Development (MLITSD), and the workplace's Joint Health and Safety Committee (JHSC). (See "Notice of occupational illness" reporting requirements under the OHSA, s.52(2).)

Supervisors

- On behalf of the employer, ensure that the construction project has adequate toilet and clean-up facilities and is adequately serviced and sanitized.
- Advise workers about the health and safety hazards, health risks, and infectious diseases associated with poor hand hygiene and inadequate sanitation of toilet facilities.

Workers

- Follow safe hygiene practices and procedures and maintain good personal hygiene.
- Report any unsafe or unhygienic conditions to the supervisor.

Safe Work Measures Checklist

Read through the checklist below and identify whether or not the proper safe work measures are in place at your site. For any items marked "No", work towards implementing those measures.

Drinking Water			
☐ Yes	☐ No		Is a supply of potable drinking water readily accessible for workers to use at the project?
☐ Yes	☐ No		Is the drinking water supplied by a piping system or a clean, covered container with a drain faucet?
General Facilities			
☐ Yes	☐ No		Are facilities serviced, cleaned, and sanitized as frequently as necessary to maintain them in a clean and sanitary condition?
☐ Yes	☐ No		Are records kept on site showing when facilities were serviced, cleaned, and sanitized?
☐ Yes	☐ No		Are facilities kept in good repair at all times?
Toilets			
☐ Yes	☐ No		Are toilets equipped with an open-front toilet seat?
☐ Yes	☐ No		Are toilets equipped with toilet paper holders and an adequate supply of toilet paper?
☐ Yes	☐ No	☐ N/A	If used by female workers, is a disposal receptacle available for sanitary napkins?
☐ Yes	☐ No		Does the toilet facility give the user privacy and protection from weather and from falling objects?
☐ Yes	☐ No		Does the toilet facility have a self-closing door that can be locked from the inside?
☐ Yes	☐ No		Is the toilet facility illuminated by natural or artificial light?
☐ Yes	☐ No		Is the toilet facility adequately ventilated?
☐ Yes	☐ No	☐ N/A	If possible, is the toilet facility adequately heated?
☐ Yes	☐ No	☐ N/A	If the toilet facility is intended to be used by males only or by females only, is that indicated by signage?
☐ Yes	☐ No	☐ N/A	If it is a single toilet facility, is it completely enclosed? **NOTE**: The requirement that a facility be completely enclosed does not apply to a portable urinal.
☐ Yes	☐ No		Are toilets kept in good repair at all times?

☐ Yes ☐ No ☐ N/A Are the minimum number of toilets required by law available at the project? (See the table below or refer to O. Reg. 213/91, s.29.1 (5) and (7))

Number of Workers Regularly Employed		Minimum Number of Toilets Required
On Sites with Water Flush or Non-recirculating Chemical-flush Toilets	On Sites with Other Types of Toilets	
1-15 workers	1-10 workers	1 Toilet
16-30 workers	11-20 workers	2 Toilets
31-45 workers	21-30 workers	3 Toilets
46-60 workers	31-40 workers	4 Toilets
61 or more workers	41 or more workers	4, + 1 for each additional group of 15 workers or less

NOTE: If toilets are located in a multiple water flush toilet facility and are intended to be used by male workers, water flush urinals may be substituted for a maximum of two-thirds of the number of toilets.

☐ Yes ☐ No ☐ N/A If the minimum number of toilets on a project are 5 or more, is there at least one facility that is for use for female workers only?

Urinals

☐ Yes ☐ No ☐ N/A If portable single-unit toilet facilities are intended for use by male workers, is there at least one urinal for each toilet?

Clean-up Facilities

☐ Yes ☐ No ☐ N/A If single-toilet facilities are being used on site, does it have its own clean-up facilities?

NOTE: One readily accessible clean-up facility may be provided for every two single-toilet facilities if those single-toilet facilities are located together in the same area at the project

☐ Yes ☐ No ☐ N/A If a multiple-toilet facility is being used, is there at least one clean-up facility for every two toilets?

NOTE: One readily accessible clean-up facility may be provided for every two single-toilet facilities if those single-toilet facilities are located together in the same area at the project

☐ Yes ☐ No ☐ N/A Does each clean-up facility have a wash basin with running water (hot and cold, if possible)?

NOTE: Running water (hot and cold) is strongly recommended. The free flow would allow workers to clean both of their hands by rubbing them against each other, using soap or other cleansers. Hot water allows workers to follow proper hand hygiene procedures, especially during colder weather. (Certain exceptions apply.)

☐ Yes ☐ No ☐ N/A If there is no wash basin with running water at a clean-up facility, is there a means to clean hands?

NOTE: If it is not reasonably possible to have a wash basin with running water at a clean-up facility, both of the following should be provided: a means of cleaning hands and an alcohol-based hand sanitizer containing a minimum of 60 percent alcohol.

☐ Yes ☐ No Are paper towels or a hand dryer provided for each clean-up facility?

☐ Yes ☐ No ☐ N/A If paper towels are provided, is a waste disposal receptacle nearby?

☐ Yes ☐ No ☐ N/A If workers on site handle substances that are corrosive, poisonous, or can endanger their health, do they have wash facilities with clean water, soap, and individual towels?

NOTE: This checklist describes safe work practices for hygiene facilities on construction sites. It has been developed with reference to O. Reg. 213/91, s.29, as well as Achieve compliance on construction sites: hygiene.

By maintaining a clean worksite, making sure that proper facilities are available for workers, and following safe work procedures regarding hygiene, we can all do our part to target sanitation issues on construction projects and prevent the spread of infectious diseases.

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