

CORPORATE HEALTH AND SAFETY MANUAL

September 2018

Contents

Introduction and Scope of Our Health and Safety Program	5
Element 1 Administration	7
1.1 Occupational Health & Safety Policy	7
1.2 Health & Safety Reporting Structure	9
Element 2 Hazard Recognition	10
2.1 Hazard Recognition, Assessment, Analysis & Control	10
2.2 Reporting Hazards	18
Element 3 Safe Work Practices	22
3.1 Safe Work Practices	22
Safe Work Practices	24
Element 4 Safe Job Procedures	28
4.1 Safe Job Procedures	28
4.2 Extreme Temperatures	30
4.3 Working at Heights	33
4.4 Working with Asbestos	44
4.5 Energy Isolation and Lockout	48
4.6 Purchasing Policy	54
4.7 MSD Prevention	56
4.8 Welding and Hot Work Permits	57
4.9 Non-Routine Work	59
4.10 Workplace Hazardous Materials Information System (WHMIS)	60
Element 5 Company Health & Safety Rules	62
5.1 Company Health and Safety Rules	62
5.2 Employee Code of Conduct	64
5.3 Subcontractors/Contractors	65
5.3b Subcontractor/Contractor Disciplinary Measures	67
5.4 Visitor Health and Safety Policy	69
Element 6 Personal Protective Equipment	71
6.1 Personal Protective Equipment Policy	71
Element 7 Preventive Maintenance Policy	79
7.1 Preventive Maintenance Policy	79
Element 8 Communication and Training	83
8.1 Communication and Training Policy	83
8.2 Job Induction	93

8.3 Safety Talks	95
Element 9 Workplace Inspection	97
9.1 Workplace Inspections	97
9.2 Pre-Use Inspection Program	100
Element 10 Incident Investigation	103
10.1 Accident/Incident Investigation	103
Element 11 Emergency Preparedness	111
11.1 Emergency Preparedness	111
11.2 Emergency Notification	113
11.3 General Emergency Procedures	114
11.4 Fire Safety Plan	118
11.5 Power Failure	122
11.6 Severe Weather Plan	123
11.7 Chemical Spill Response	125
11.8 Emergency Equipment	127
Element 12 Statistics and Records	129
12.1 Statistics and Records Policy	129
Element 13 Legislated Requirements	132
13.1 Legislated Duties and Responsibilities	132
13.2 Responsibilities of the Health and Safety Program Coordinator	141
13.3 Performance Evaluation and the Performance Improvement Plan (Discipline Policy)	143
13.4 The Right to Refuse Unsafe Work	148
13.5 Posted Health and Safety Materials	151
Element 14 Occupational Health	153
14.1 Occupational Health Policy	153
Element 15 First Aid	157
15.1 First Aid	157
Element 16 Joint Health and Safety Committee/Health and Safety Representatives	161
16.1 Joint Health and Safety Committee (Head Office)	161
16.2 Health and Safety Representatives, JHSC and Worker Trade Committee (Job Site)	168
Element 17 Workplace Violence and Harassment	173
17.1 Workplace Violence and Harassment Policy Statement	173
17.2 Workplace Violence Risk Assessment	180
17.3 Workplace Harassment Prevention	184
17.4 Reporting, Follow Up and Early Resolution for Workplace Violence and Harassment	189
Element 18 Return to Work	193

18.1 Early and Safe Return to Work Program	193
Element 19 Management Review	202
19.1 Continuous Improvement Plan	202
19.2 Management Meetings	205
Element 20 Document Control	207
20.1 Document Control Procedure	207

Introduction and Scope of Our Health and Safety Program

Since its inception in 1975, ROSSCLAIR Contractors Inc. (ROSSCLAIR) has provided a high- quality grade service that meets or exceeds the expectations of our customers. ROSSCLAIR will work aggressively to keep ahead of its competition by continuously improving performance in five key areas:

- Value
- Excellent, quality customer service
- Reliability
- Promoting and providing a safe and healthy workplace
- Employee development

Health and Safety is one of the main pillars that play a very important role in achieving success for ROSSCLAIR. Our management is committed to providing and maintaining a safe and healthy working environment for employees and any person entering upon its premises or with connection to the company's business operations. In demonstrating our due diligence ROSSCLAIR will make every reasonable effort to provide a working environment that minimizes incidents of risk or personal injury, ill health or damage to property.

ROSSCLAIR targets for safety and health management are to:

- Reduce injuries to as low as reasonably achievable
- Reduce off-the-job injuries to as low as reasonably achievable
- Be recognized as a role model in occupational health and safety in our industry

The purpose of this manual is to provide employees with policies governing their safe work practices and with approved safe methods and to prevent or minimize injuries and product damage. It will provide a clear set of guidelines for activities that if followed rigorously will reduce accidents and incidents of occupational injuries and illnesses.

This manual provides a framework for a comprehensive occupational health and safety program at ROSSCLAIR. It implements rigorous standards that management and staff at all levels regularly access and update to ensure that they meet the health and safety needs for providing a safe and healthy workplace.

Every employee at ROSSCLAIR is required to be familiar with the elements of the manual that apply to them and to complete all the training programs provided by the company as required.

Safe work practices are expected of all personnel at ROSSCLAIR. All employees are responsible for following safety policies and procedures in their work areas. The intent of these programs is not to affect the quality, the quantity or the freedoms normally associated with an employee's work. Nor is the intent to be rigid or inflexible. Certain endeavors may require that exemptions to the programs be made in order to foster safety at work.

Our management team is willing to hear specific concerns as they arise and to assist personnel involved with meeting the requirements as defined that will meet the spirit of these programs while adequately protecting our employees and company assets.

Employees are expected to bring safety concerns to the attention of their Supervisors, so the situation can be investigated, and appropriate corrective action taken.

ROSSCLAIR is committed to take all reasonable precautions towards providing a safe work environment free from recognized hazards. If everyone cooperates, ROSSCLAIR can become an industry leader and role model for managing health and safety in the workplace.

The resources and references listed can be helpful in meeting any special needs, and in tailoring the programs. This manual will serve, along with other available reference material, as a resource to assist employees at ROSSCLAIR in meeting our goal of an accident free workplace.

John E. Richardson President

ROSSCLAIR Contractors Inc.

Element 1 Administration

1.1 Occupational Health & Safety Policy

I. Purpose

- a) The Occupational Health & Safety Policy is a statement of intent and includes the principles, philosophies and requirements of ROSSCLAIR, as a minimum will address the following:
- basic objectives of the Program
 - responsibility of all employees
 - laws as minimum standards
 - current philosophy toward health and safety
 - Intolerance for unacceptable health and safety performance.
- b) All workplace parties, including suppliers and subcontractors must regard the Health & Safety Policy as a directive for compliance with the Health and Safety Program.

II. Responsibilities

- a) Senior Management team shall ensure:
- The Health and Safety Policy is created, signed, and reviewed annually as per the Occupational Health and Safety Act.
 - Communication and distribution of the policy

III. Procedure

- a) The Occupational Health & Safety Policy Statement must be reviewed on an annual basis. This review must be documented in the Review, Revisions and Approvals form.
- b) The Health & Safety Policy must be signed and dated by the ROSSCLAIR President.

IV. Distribution

The Health and Safety Policy Statement will be communicated and distributed to all our subcontractors and employees upon request and as part of:

- Employee Orientation
- Subcontractor Safety Package
- Posted on all Health & Safety Communication Boards, office and at projects sites
- Safety Talks or Toolbox Talks
- Payroll mail out

V. Reference Documents

- Occupational Health and Safety Policy Statement

OCCUPATIONAL HEALTH AND SAFETY POLICY STATEMENT

ROSSCLAIR is vitally interested in the health and safety and protection of our workers from hazards that could cause injury or occupational illness. We are committed to working collaboratively with workers in the development, implementation, monitoring and continuous improvement of our Health and Safety Program.

As the employer, ROSSCLAIR and our Senior Management team are ultimately responsible for worker health and safety. Commitment to health and safety must remain an important part of our standards and an integral part of this organization, from the President to the workers. In addition, we will provide competent supervision and take every reasonable precaution in the protection of a worker by:

- maintaining our properties, worksites, vehicles, and equipment in a safe working condition.
- conducting work in compliance with regulatory requirements and implementing best industry practices where practical,
- monitoring the activities of our sub-contractors,
- ensuring all workers receive the necessary information and training to perform work safely.
- supporting a joint health and safety committee and health and safety representatives in carrying out their responsibilities and duties

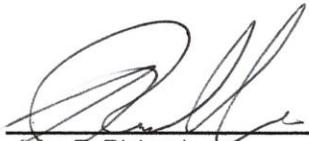
Supervisors will be held accountable for worker health and safety by ensuring:

- equipment is maintained and used in a safe manner by trained workers only,
- established safe work practices and procedures are enforced,
- adequate training is provided to workers so that they can perform their work safely.

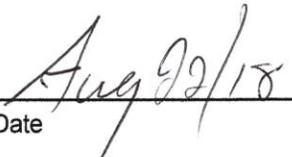
Workers have a right to refuse unsafe work that may endanger them self or another person. It is the best interests of all parties to consider health and safety in every activity and to report any workplace hazards, working conditions, procedures or anything else that can endanger their own health and safety or that of other workers. In addition, workers must:

- wear the required personal protective equipment and devices required by the Act and ROSSCLAIR.
- know and understand the hazards in the workplace and report any potential or known hazard,
- work in compliance with the law and established safe work practices and procedures, and report any non-compliances observed,
- not engage in any rough or boisterous activity.

ROSSCLAIR understands that workers have a right to work in a healthy and safe work environment. All workplace parties must be dedicated to the continuing objective of reducing the risk of injury. Unsafe workers may be terminated. As President of ROSSCLAIR I give you my personal promise that I am committed to promoting occupational health and providing workers with a safe work environment.



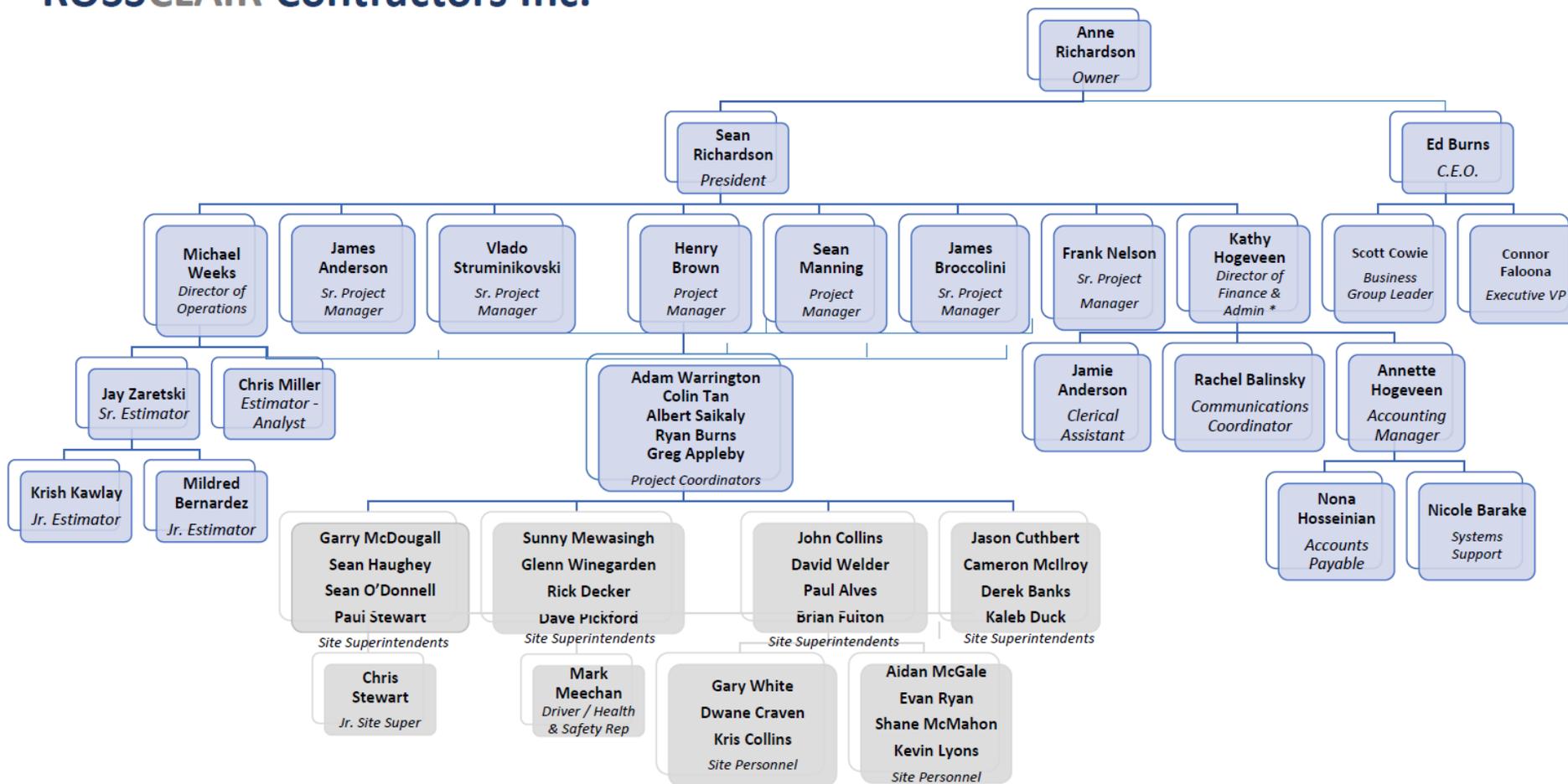
John E. Richardson
President
ROSSCLAIR Contractors Inc.



Date

1.2 Health & Safety Reporting Structure

ROSSCLAIR Contractors Inc.



* Health & Safety Program Coordinator *Emergency Plan Coordinator

Element 2 Hazard Recognition

2.1 Hazard Recognition, Assessment, Analysis & Control

I. Purpose

- a) ROSSCLAIR understands the integral role hazard recognition plays in proactively controlling occupational health and safety hazards to mitigate any possible injury and or illness in the workplace. The procedure is intended to provide direction, orientation and guidance on the ongoing assessing, evaluating, and analysis of controls implemented to control the hazards.
- b) The methodology outlined in this document is applicable to main tasks performed by or on behalf of ROSSCLAIR. All personnel performing work on behalf of ROSSCLAIR are required to comply with any/all subsequent standards.
- c) ROSSCLAIR believes that the proper identification, assessing, controlling and continued evaluation hazards in the form of risk assessments can be used to focus and streamline an employers' health and safety activities to focus their attention on eliminating or controlling hazards that pose the greatest risk to workers. In addition, this document meets the requirements of the Act, and regulations by:
 - Ensuring that the health and safety of every person employed by the ROSSCLAIR is protected,
 - Acquainting workers with the hazards associated with their work, and
 - Providing workers with the appropriate knowledge, training, assistance or supervision to perform work in a safe manner.

II. Responsibilities

- a) Senior Management are responsible for:
 - Ensuring that this procedure is implemented and enforced.
- b) Project Managers are required to:
 - Obtain a hazard and risk assessment for critical tasks from Subcontractors/Contractors. If the Subcontractor/Contractor does not have a method for determining hazards and analyzing risks, the Project Manager shall provide a copy of this document to the Subcontractor/Contractor as reference.
 - Provide a copy of the received Subcontractor/Contractor hazard and risk assessments into the Site Safety Plan.
 - Periodically verify that the Subcontractor/Contractor are completing Pre-Job Safety Inspections to verify that the hazard assessments are accurate.
- c) Site Supervisors and foreman are responsible for verifying that:
 - Subcontractors/Contractors are performing the critical tasks with controls outlined in the hazard and risk assessment.
 - Hazard and Risk Assessments are conducted by the Subcontractor/Contractor for all

critical tasks.

- d) All subcontractors performing work on behalf of ROSSCLAIR are required to:
- Submit a copy of the hazard and risk assessment for each of the critical tasks to be performed at the job project.
 - Provide copies of their pre-job site inspections, safety talks and hazard risk assessments upon request of a ROSSCLAIR Project Manager, Site Supervisor or Foreman.
 - Ensure all their workers are aware of the hazards associated with the work performed and the controls implemented for their protection.

III. Definitions

Hazard is any practice, behavior, condition, or combination that can cause injury or illness to people or damage to property.

Risk is the chance or probability that a person will be harmed or experience an adverse health effect if exposed to a hazard. It may also apply to situations with property or equipment loss. Risk is the combination of the likelihood of the occurrence of a harm and the severity of that harm.

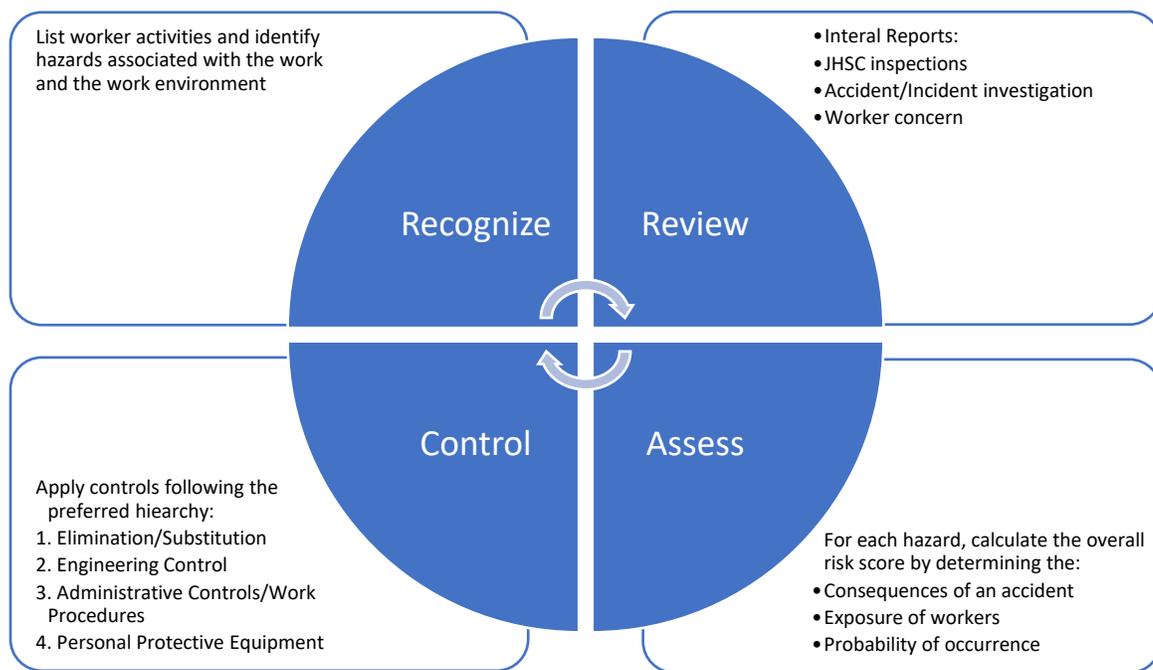
Hazard Risk Assessment: Is a systematic method of identifying workplace hazards and evaluating the risk they pose to workers. The purpose of a risk assessment is to make recommendations to eliminate or reduce the risk that a hazard poses to workers

Hazard Control: refers to corrective actions resulting from the risk assessment that are meant to minimize injury, reduce adverse health effects and property damage. There is a preferred hierarchy to follow when implementing controls:

- | | |
|---------------------------------|-----------------------------------|
| (1) Elimination or Substitution | (4) Work Practices and Procedures |
| (2) Engineering Controls | (5) Personal Protective Equipment |
| (3) Administrative Controls | |

IV. Methodology

Risk assessments are used to determine the likelihood that a hazard may lead to injury or illness and the severity of that potential injury or illness. These assessments are conducted on hazards that arise out of the job processes or methods used within the workplace. Evaluation of job processes are conducted only on work that is within the normal scope of daily work and are done only on work that follows established safe work procedures and/or legislated and regulated requirements.



Hazard Categories*

Description

Physical Agents	Noise, Vibration, Extreme Temperature, Radiation
Biological Agents	Viruses, Bacteria, Parasites, Fungi
Chemical Agents	Vapour, Dust, Mist, Fume, Gas, Fibres
Musculoskeletal	Awkward/static postures, high force demands, high repetition rates, no rest
Psychosocial	Excess workload, boredom, harassment, workplace violence and or harassment, lack of control of work activity, Workplace Culture
Safety	Electrical hazards, Mechanical Hazards, Working at Heights, Sharp Edges, Fire Hazards, Walking and Working Surface Hazards (Slips, Trips and Falls)

Contributing factors** May increase the potential for injury or illness. When identifying hazards, consider any potential contributing factors that may exist.

People	<ul style="list-style-type: none"> Action or inaction of other workers, clients, contractors, visitors to follow established safe work practices, procedures, standards or codes Habits, Experience,
Equipment	<ul style="list-style-type: none"> Non-functioning equipment, New equipment with technology change, new operating risks, Lack of maintenance and repair, Insufficient supply,

Material	<ul style="list-style-type: none"> • Defective, • Insufficient supply, • Weight, • Hazardous,
Environment	<ul style="list-style-type: none"> • Physical layout of workplaces, • Sub-standards conditions, • Noise, • Temperature, • Lighting, • Congestion, • Housekeeping
Process	<ul style="list-style-type: none"> • Inefficient work system design and/or work flow, • Inadequate Safe Work Practices or Safe Job Procedures, • Communication, • Lack of orientation, training or supervision

Hazard Rating System

Risk scores are comparative. The risk scores from these assessments can be compared (as they were completed by the same assessor) and should be used to determine which hazard poses the greatest risk to workers. However; these scores can only be compared to other industries or companies if similar methods were used.

1. When assessing each task or hazard consider:

- Laws (Acts, Regulations)
- Codes (Building, Electrical, Fire etc.)
- Standards & Guidelines (MOL, CSA, Industry),
- Workplace Health & Safety Practices, Procedures and Policies
- Manufacturers and Suppliers recommendations

2. Determine the severity (consequences) of an accident that could occur if the hazard remains uncontrolled, or as is. This is based on the worst probable result, not the worst possible result, because the worst possible result is always death. Most accidents do not result in death but in injury or can be near misses. To reliably rate the hazards of specific tasks, we need to look at what is the most likely outcome of an accident caused by the hazard.

- Severity Rated**
- Score:** 1(Minimum) to 4 (Maximum) (Severity of Injury)
 - Intent is along the Left side of the Risk Chart ranging the Major, Moderate and Minor)
 - 4. Catastrophic (death, significant injury or property damage)
 - 3. Critical (medical aid, lost time incident, property damage)
 - 2. Marginal (first aid injury, minor illness, property damage)
 - 1. Negligible (injury/illness/property damage not likely)

3. **Identify the Likelihood** that the exposure to the hazard will result in the identified consequence.

- Likelihood Rated**
- Score:** 1(Minimum) to 4 (Maximum) (Likelihood of Injury)
 - o Intent is along the top of the Risk Chart ranging the High, Medium and Low
 - 4. Very likely to occur (expected)
 - 3. Could probably occur (> 50%)
 - 2. Possibility of occurring (known to have happened, history)
 - 1. Very unlikely (one in a million, Act of God)

Legend:

Risk Chart		Likelihood of Injury			
		Frequent 4	Probable 3	Occasional 2	Remote 1
Severity of Injury	Catastrophic – 4	16	12	8	4
	Critical – 3	12	9	6	3
	Marginal – 2	8	6	4	2
	Negligible – 1	4	3	2	1

Notes:

- i. The above Risk Chart is to capture a Pre-Control Risk Level with reviewing Likelihood and severity ratings.
- ii. Apply the appropriate control and reassess the risk rating to determine the post-control rating.

4. **Total Risk Factor Weight or Rating Number**

- Using the calculated pre-control value apply the following scale to determine if the hazard has an “A-B-C” or “High-Medium-Low” risk rating.

High Risk (A) = 9 – 16

Medium Risk (B) = 4 – 8

Low Risk (C) = 1 – 3

Notes: When the risk factor is:

- i. When the risk is rated “High” or “A” or “Red” a Safe Job Procedure must be implemented along with training and documentation.

Risk Chart		Likelihood of Injury			
		Frequent	Probable	Occasional	Remote
Severity of Injury	Catastrophic	A	A	B	B
	Critical	A	A	B	C
	Marginal	B	B	B	C
	Negligible	B	C	C	C

- ii. When the risk is rated “Medium” or “B” or “Yellow” a Safe Work Practice must be

implemented.

Risk Chart		Likelihood of Injury			
		Frequent	Probable	Occasional	Remote
Severity of Injury	Catastrophic	A	A	B	B
	Critical	A	A	B	C
	Marginal	B	B	B	C
	Negligible	B	C	C	C

5. **The Hazard Rating System “HRS”** is a tool that identifies the substandard practice or condition and immediately establishes its priority for correction according to its level of Probability and Severity.

High Risk or Class A:	
Definition	A condition or practice likely to cause permanent disability, loss of life or extensive loss to property equipment/material
Example	Missing: barriers, guards, Fall arrest. Inadequate: lock-out, respiratory protection
Action	Immediate action required to eliminate the hazardous condition or practice.
Medium Risk or Class B:	
Definition	Condition or practice likely to cause a serious injury resulting in temporary disability or property damage that is disruptive but not extensive.
Example	Poor housekeeping, slippery work surface, missing fire extinguisher, inadequate brakes on scaffold, missing Traffic Control Plan etc.
Action	Action to be taken as soon as possible to rectify the Hazardous Condition, but immediately correct the unsafe Practice
Low Risk or Class C:	
Definition	Condition or practice likely to cause a minor, non-disabling injury or non-disruptive property damage.
Example	Bad smell from Form Oil, workers handling sharp equipment/tools without gloves.
Action	Action may be taken depending on the level of irritancy, and the levels of frequency and probability.

V. Procedure

- a) Risk assessments are only conducted on main tasks performed by or on behalf of ROSSCLAIR. This document outlines the general process for performing a hazard and risk assessment.
- b) Identify the hazards of a task. Each supervisor and a Health and Safety Representative (HSR) or Joint Health and Safety Committee (JHSC) Worker member will:
 - Review each job description
 - Review the physical demands analysis
 - Consider both actual and potential hazards and all hazard categories*
 - Concerns raised by workers
 - Look for contributing factors** (People, Equipment, Materials, Environment & Process)
 - Look at Energy and its transfer
 - Lack of Consistency (corporate risk)
 - Extent of specific legislation policy

Note: Hazard identification can also include the review of internal and external documentation, including:

External Sources

- ✓ Safety Data Sheet
- ✓ New equipment manuals
- ✓ Maintenance records
- ✓ MOL alerts

Internal Sources

- ✓ Workplace Inspections (JHSC, Supervisor)
- ✓ Work Refusals
- ✓ Accident/Incident Investigation

- c) The supervisor, HSR and or the JHSC Worker Member are then to observe a worker performing the job and identify the step-by-step tasks followed to perform the job.
- d) Identifying hazards associated with each job task onto the Hazard Risk Assessment Form. Asking the worker for input to ensure hazards are identified.
- e) Calculate the overall risk based on each hazard risk data:
 1. Analyze each risk score to determine which identified risks need to be addressed first. Hazards with high risk scores should be addressed first as they have a higher probability of occurring and the severity of injury is greater.
 2. Identify if there is a control in place and assess if the control is adequate. If no control is in place recommend a control to eliminate or reduce the risk of injury or illness.
- f) Forward a copy of the risk assessment to Senior Management for review and sign off.
- g) The Senior Management, Joint Health and Safety Committee and supervisor will create and identify an action plan, to include timeline for completion, resources required and responsibility to develop, implement and follow up on the control to ensure that the control is in place and has mitigated against the risk (following the Hierarchy of Controls)
- h) Safety Action Plan - Based on the Job Hazard Analysis, any recommendations accepted for hazard controls will be documented, assigned and tracked in our Safety Action Plan

Program.

VI. Distribution

- a) Finalized hazard and risk assessments (HRA) are reviewed with existing employees to ensure that all workers are aware of the hazards associated with their work and the controls that were implemented to eliminate or reduce their exposure to these hazards. In addition, these HRAs will be utilized in New Employee Orientations as a means of communicating and acquainting the new worker with the hazards of the workplace.
- b) Training Any revisions to existing procedures, instructions or training requirements, or the introduction of any new procedures or instructions that are the result of the Job Hazard Analysis will be communicated to all affected employees in a determined training format.
- c) The completed HRAs are kept on file at both the job sites and head office for record retention and due-diligence purposes.

VII. Evaluation

- a) The initial and continued effectiveness of the implemented controls will be evaluated by:
 - JHSC during workplace inspections,
 - Supervisor/Manager site inspections
 - Worker feedback
- b) The overall risk assessment will be reviewed on an annual basis, at minimum, or when there is a:
 - Change in the process or machinery,
 - Trend of accidents,
 - Serious accident, incident, or near miss

VIII. Reference Documents

- Job Hazard Analysis Form
- Inventory of Job Hazard Assessment (Critical Task List)

2.2 Reporting Hazards

I. Purpose

- a) Every employee of ROSSCLAIR is encouraged to report hazards and will not be subject to disciplinary action or any reprisal for reporting hazards.
- b) As per the ROSSCLAIR Health and Safety Policy and the Ontario Occupational Health & Safety Act every employee is responsible for reporting to their Supervisor/Manager any existing or potential hazards that they identify or become aware of during their day to day job duties.
- c) To ensure that all managers/supervisors, Joint Health and Safety Committee (JHSC) members, Health and Safety Representatives (HSR) and workers are trained on the Hazard Recognition, Assessment, Analysis and Control process.

II. Responsibilities

- a) Senior Management are to:
 - Ensure that the supervisor, JHSC/HSR have the time and appropriate resources to perform the hazard risk assessments (HRA).
 - Ensure managers, supervisors and the JHSC/HSR are provided training on and understand the Hazard Recognition, Assessment, Analysis and Control process.
 - Review the completed HRA, associated job descriptions and physical demands analysis and provide feedback or input to the HSR/JHSC and supervisor.
 - The completed reviews are signed off as confirmation of the review.
 - Work with the manager to identify effective controls to mitigate any potential injury, illness or incident from high or medium risks. Ensure that the action plan developed is implemented and followed up to review suitability.
 - Review any reported hazards and verify that immediate action was taken to control the hazard. Review the updated HRA to verify implemented control effectively mitigated the risk of incident, injury or illness.
- b) Project Managers and Site Supervisors are required to:
 - Ensure workers under their direct supervision are trained on and understand the importance of hazard reporting.
 - Review each existing job description and physical demands analysis with the JHSC/HSR and Supervisor.
 - Afford assistance to the JHSC/HSR and supervisors when conducting the hazard risk assessment for each job duty and encourage worker participation.
 - Review each hazard risk assessment with the site supervisor and immediately implement any necessary controls to mitigate risk and follow up on implementation.
 - Educate all workers under your supervision on the hazards associated with the

workplace and job duties and to confirm their understanding and awareness.

- Review all hazard reports forwarded by employees with Senior Management. Immediately implement corrective action or develop an action plan to implement corrective actions to eliminate or reduce the identified hazard(s).
- c) Joint Health and Safety Committee Member/Health and Safety Representative shall:
- Review each existing job description and physical demands analysis with the manager and or supervisor.
 - Conduct the hazard risk assessment for each job duty with the supervisor and with worker participation in a timely manner.
 - Review each completed hazard risk assessment with the supervisor/manager.
 - Make recommendations for control of identified hazards to Senior Management, Manager or Supervisor and assist in the implementation of the action plan.
 - Verify the effectiveness of control via the monthly inspection and observations.
 - Immediately notify management on any known hazard reports
- d) All employees are to:
- Immediately report hazards using the Hazard Report Form and provide the completed form to their supervisor immediately.
- Note:* Hazards can be reported immediately to the Supervisor verbally with the form being completed afterwards. Never leave a hazard unattended.
- Cooperate and actively participate in the hazard risk assessment process by reviewing each hazard risk assessment and providing feedback when necessary.
 - Comply with all implemented safe job procedures and safe work practices implemented to mitigate any identified hazards of the workplace and immediately notify your supervisor if the hazard persists, or if any new hazard results.

III. Procedure

- a) All new managers, Supervisors, and Workers will receive training on Hazard Reporting and The Hazard Recognition and Control Process during their on-boarding training upon hire.
- b) All existing personnel will receive periodic refresher training on the hazard risk assessment Control activities training during safety training, general safety meetings and safety talks
- c) Each worker trained on the Hazard and Risk Assessment procedures will sign off confirming their attendance and understanding.
- d) Hazard Recognition, Assessment, Analysis and Control procedure will be evaluated by reviewing submitted work site hazard reports, risk assessment reports, accident reports, accident trends, orientation files, JHSC minutes and safety audits.

- e) The procedure will be evaluated through the analysis and feedback from all workers involved in the Hazard Risk Assessment process and form completion.
- f) Compliance and efficiency of policy will be measured by looking at the following:
 - ✓ Has legislation changed? Are there new best practices in the industry?
 - ✓ Is the health and safety standard being implemented?
 - ✓ Are the health and safety goals being met?
 - ✓ Is communication about the standard, both to and from employees, clear and understood?
 - ✓ Is training to the standards being completed and are employees benefiting from it?
 - ✓ Are employees following safe work procedures?
 - ✓ This standard will be reviewed every year and maybe changed due to business needs, any legal requirements and based on the results of the evaluation
- g) During the internal audit process all inspection reports, worksite surveys, hazard reports, and corrective action are reviewed to identify any possible gaps in the hazard recognition process. Corrective actions will be implemented as necessary to ensure the success of this process.
- h) Following the results of the evaluation, any identified deficiencies and gaps in the program will be recorded in an action plan by Senior Management.
- i) Senior Management will review areas identified as needing improvement and make recommendations.
 - i. The recommendations are captured in an action plan by and communicated to senior management and are reviewed monthly to ensure progress is being made.
 - ii. The action plan might be modified during the year due to priorities changes, operational and budget issues.
- j) An email or communication (report) will be sent to all ROSSCLAIR employees to acknowledge results of the past year and to determine Health and safety objectives for the next year.

IV. Distribution

- a) A copy of the Hazard Recognition, Assessment, Analysis and Control Policy is kept in the ROSSCLAIR manual binder.
- b) The Hazard Recognition, Assessment, Analysis and Control Policy is communicated to all new ROSSCLAIR workers, supervisors, and managers via the new hire orientation.
- c) All existing workers will receive orientation through safety meetings, JHSC, onsite safety talks, internal safety emails.

V. Reference Documents

- Job Hazard Analysis Form - Sample
- Job Hazard Analysis Form – blank
- Inventory of Job Hazard Assessments (Critical Task List)

Element 3 Safe Work Practices

3.1 Safe Work Practices

I. Purpose

Safe Work Practices are created to aid in the protection from occupational illness, injury or loss by standardizing the performance of work and raising awareness for common hazards and associated controls.

II. Responsibilities

- a) Senior Management will:
 - Train managers and supervisors on all SWPs that apply to their work.
 - Ensure managers and supervisors periodically observe and inspect their work areas to ensure SWP are being followed.
 - Encourage workers to participate in the developing of SWP.
 - Ensure SWP are reviewed during all general site orientations with supervisors and workers.
- b) Project Managers/ Supervisors will:
 - Review and understand all Safe Work Practices applicable to the performance of their work.
 - Ensure employees have been trained on the applicable SWP and where appropriate, provide refresher training through tool box talks and other safety meetings.
 - Ensure subcontractors provide and adhere to SWP requirements based on their own health and safety program.
 - Ensure through observation and inspection that work is performed in compliance with Safe Work Practices.
 - Provide feedback to Senior Management to assist in the development and maintenance of SWP.
- c) All employees are required to work in compliance with established Safe Work Practices.

III. Procedure

- a) Safe Work Practices (SWP) will be established for common tasks where a moderate to high level of risk exists, as identified through the hazard risk assessment (HRA) process.
- b) Senior Management will create a list of required Safe Work Practices and ensure that these SWP are created with information obtained from recognized safety associations, product manufacturers, relevant industry standards, CSA standards and legislation.
- c) The SWP are reviewed annually, at minimum, by Senior Management and the Joint Health and Safety Committee during the internal audit process. This review is to ensure that the SWP are complete and current with existing industry best practices and all applicable legislation.
- d) The site supervisors will provide feedback to Senior Management on the accuracy of the Safe Work Procedure by observing the work being performed.

- e) Where workers are found to be performing work in a manner which is unsafe and inconsistent with established Safe Work Practices, the site supervisor will retrain and/or take corrective action as appropriate.

IV. Distribution

- a) Safe Work Practices will be stored in a location that is readily accessible to all employees.
- b) Copies of Safe Work Practices will be in the Site Safety Manual.
- c) Copies of the Safe Work Practices will be provided to Subcontractors/Contractors.

V. Reference Documents

- Safe Work Practices

Safe Work Practices

Straight Ladders

- Use the right ladder for the job.
- Inspect the ladder before and after use to ensure that it complies with CSA CAN-3- M81.
- Tag and remove defective ladders.
- Get help when moving heavy or long ladders.
- Make sure that your shoes are safe; not wet or muddy.
- Put the ladder up correctly – one foot back for each four feet up.
- Ensure the ladder is extended at least 1 metre beyond the top surface to allow for safe access and egress.
- Secure the top of the ladder to restrict movement.
- Where there is the danger of traffic, have someone hold the ladder. Post a warning sign, if Hazard Assessment deems necessary.
- Secure the top and bottom of the ladder if using it to access a platform or scaffold.
- Face the ladder when ascending or descending.
- Hoist materials in a pail or tool-bag or attach them to a belt.
- Do not carry materials in your hands.
- Always maintain 3-point contact with the ladder.
- Make sure that only one person at a time is on the ladder.
- Don't stretch beyond the side rails of the ladder.
- Never stand any higher than the third rung from the top of a ladder.
- Keep metal and wet wooden ladders away from live electrical circuits.

Stepladders

- Never use a stepladder as a straight ladder.
- A worker must not perform work from either of the top two rungs, steps or cleats of a portable ladder.
- Lock the stepladder; spread the legs to their limit and ensure the braces are locked.
- Ensure you use the appropriate size/height of ladder to reach the desired work height

Good Housekeeping

- Every employee should take pride in his or her workplace. Keep your work area clean and clear of hazards.
- Aisles, fire exits, fire extinguishers and light controls must always be kept clear.

Slip, Trip and Fall (Same Level)

Slip and trip hazards must be recognized and removed through tidy workplace practices, and through delegated accountabilities. In addition, the following is a guide for maintaining areas free from slip and trip hazards:

- Spills control procedures must be followed
- Proper footwear (safety shoes or boots with good tread) must be worn and laced up properly.
- Flooring should be assessed for slip resistance and elevation levels, and adequate lighting provided
- Use secure doormats or abrasion strips to prevent slipping, and install handrails wherever appropriate
- Barriers, signs or notices should be used wherever necessary
- Weather conditions should be addressed for any outdoor activity, including normal access to the building.

Material Handling

Ontario's leading cause of injuries is strains and sprains with the number one reason being improper lifting. A lot of pain and suffering can be avoided by lifting and handling materials in a safe way.

- Lift safely – bend your legs, keep your back neutral and keep the load close to body.
- Always obtain help if heavy or awkward objects must be moved. Any larger loads, or loads weighing over 50 lbs. should be completed as a two-person lift.
- Wear gloves when handling sharp or rough materials.
- If possible use a cart when moving heavy loads. It is easier to have the objects pushed, rather than pulled or carried. Always secure loads when moving materials.

Handling Hazardous Chemicals

- Only use chemicals that you have been trained to use.
- Always familiarize yourself with the contents of the Safety Data Sheet (SDS) prior to using any hazardous material for the first time.
 - You are required to be familiar with the spill response procedures before using any chemical. If in doubt, ask your supervisor or safety representative.
- Proper housekeeping and handling procedures are used to mitigate potential spills.

However, always consult the SDS to ensure the any spills, splashes or overflows are handled properly. Dispose of spill materials in accordance with local regulations and as per the SDS. Ensure you report any spills.

- Know where the SDS are kept.
- Personal protective equipment, such as respirators, safety glasses and gloves may be required. Always rinse off protective equipment after each use and store according to manufacturer's directions.
- Never dispense chemicals without having an emergency eye wash station nearby.
- All employees will be trained in our WHMIS 2015 Program.

Fire Prevention

- Smoking is prohibited inside any workplace in Ontario, including company vehicles. Smoking is permitted in designated areas only on jobsites
- Fire extinguishers are located at each emergency exit at the head office and jobsites are provided fire extinguishers. Fire extinguishers must be kept at their designated location and are only to be used for their intended purpose.
- Always keep access to fire extinguishers and egress routes free and clear from obstructions.
- All staff are required to participate in any fire prevention training, including basic fire extinguisher training and drills.
- Hot work can only be conducted in areas designed for that purpose, or when additional precautions are taken as per the Hot Work Permit Policy.

Head Office Safety Rules

- Desk or file cabinet drawers are to be closed after use and should not open into aisles or walkways.
- Ensure weight is evenly distributed in file cabinets so as not to create a top-heavy condition.
- Faulty desks, chairs or other office equipment are to be repaired or taken out of service.
- Wastebaskets, purses and briefcases are to be placed so as not to create a tripping hazard.
- Space heaters must be CSA or UL approved, have automatic shut-offs in case of tip over, be located 3 feet from combustible materials and unplugged when not in use.
- Emergency exits must remain free from all obstructions.
- Workstations should be ergonomically adjusted to the user to reduce the risk of MSI (multi skeletal injuries).
- Consumption of food should be restricted to the lunchroom as much as possible.

Alcohol and Drugs

- Employees are not permitted to possess or consume alcohol or any substance (legal or illegal) that would alter the workers judgement or might affect a worker's ability to perform their work safely.
- A worker will be required to have their attending medical practitioner complete a Fit for Work Form and submit prior to being able to return to site or on the company's premises. As well, employees are not permitted to consume alcohol, marijuana or illegal drugs during business hours.
- If an employee appears to be under the influence of alcohol, marijuana or an illegal substance, regardless of where it was consumed, he/she will not be permitted to work. Any employee who appears to be under the influence of alcohol, marijuana or an illegal substance will be sent home, at his or her own expense, and will be subject to further discipline up to and including discharge.
- To ensure the protection of all our workers, random drug testing may be completed by ROSSCLAIR.

Element 4 Safe Job Procedures

4.1 Safe Job Procedures

I. Purpose

- a) The safe job procedures are created for the activities and job tasks that were rated as a moderate to major hazards in the hazard risk assessment. These procedures are intended to mitigate risk to workers by systemically organizing work and controlling a worker's exposure to the hazards associated with work activities. Safe Job Procedures are a training aid, used to provide workers with a written set of instructions for performing work safely.
- b) Safe Job Procedures are also developed for day to day safety initiatives, including:
 - Hazard Assessments,
 - incident investigation and/or
 - Supplemental to a safe work practice.
- c) All employees will perform work in a manner consistent with the Safe Job Procedure, as appropriate.

II. Responsibilities

- a) Senior Management shall:
 - Ensure that a hazard risk assessment is completed for common tasks, and that a Critical Task List is generated from the moderate to high-risk tasks.
 - Provide the assistance, identify and assign qualified (knowledgeable, trained and experienced) employees, or external support, in the development of Safe Job Procedures.
 - Jointly create Safe Job Procedures with all affected persons performing the task to ensure the job is performed safely and efficiently.
 - Ensure training is provided to all workers impacted by a Safe Job Procedure so that the work can be performed in a safe manner.
 - Keep Safe Job Procedures readily accessible to workers so that they may be used as a reference.
 - Conduct an annual review of all Safe Job Procedures to ensure they remain accurate, legally compliant, efficient, etc.
- b) Project Managers and Supervisors will:
 - Assist in the creation and review of Safe Job Procedures.
 - Keep Safe Job Procedures readily accessible to workers so that they may be used as a reference.
 - Train workers on the Safe Job Procedures so that they may perform work in a safe manner.
 - Provide feedback and recommendations for the continual improvement of the Safe Job Procedures where appropriate to ensure its continued effectiveness.
 - Ensure that the Safe Job Procedures are followed and are consistently enforced.
- c) Workers shall:

- Provide information on job tasks so the Safe Job Procedures created are accurate.
- Perform work in compliance with the Safe Job Procedures.
- Make recommendations to their direct Supervisor where appropriate so that the Safe Job Procedures remain accurate and efficient.

III. Procedure

- a) Following the completion of the hazard risk assessment, a Critical Task List is generated by Senior Management and or designate, identifying the moderate to high-risk tasks.
- b) Senior Management and the Joint Health and Safety Committee, with the assistance of site supervisors and other ROSSCLAIR personnel will create Safe Job Procedures for all tasks identified as moderate to high-risk.
- c) During the internal audit process an annual review of all Safe Job Procedures is conducted to ensure the Safe Job Procedures remain accurate, legally compliant, efficient, etc.
- d) Project Managers and Site Supervisors will observe the work being performed and will provide valuable feedback to Senior Management on the effectiveness of the Safe Job Procedures.
- e) Workers will notify their direct Supervisor of any discrepancies in the Safe Job Procedure so that the document can be reviewed and modified to reflect current conditions.

IV. Distribution

- a) Safe Job Procedures will be stored in a location that is readily accessible to all employees.
- b) Safe Job Procedures will be made available to subcontractors and suppliers upon request.

V. Reference Documents

- 4.2 Extreme Temperatures
- 4.3 Working at Heights
- 4.4 Working with Asbestos
- 4.5 Energy Isolation
- 4.6 Purchasing Policy
- 4.7 MSD Prevention
- 4.8 Welding and Hot Work Permit
- 4.9 Non-Routine Work
- 4.10 Workplace Hazardous Material Information System (WHMIS)

4.2 Extreme Temperatures

I. Purpose

To identify hazards and the necessary controls to protect workers who may be exposed to high levels of heat/cold, and/or other climatic conditions that may cause adverse effects to health and safety in the performance of their regular job duties.

II. Responsibilities

- a) Senior Management shall
 - Develop, communicate and implement the heat stress plan for workers.
 - Ensure workers are adequately protected from extreme temperatures.
 - Ensure potable water is readily available on job sites.
- b) The Supervisor is required to evaluate the work that will be performed, and ensure that:
 - Extreme Temperature plans are developed, implemented and communicated with all workers.
 - Workers are trained to recognize the signs and symptoms of heat and cold stress and to know how to avoid them.
 - Warn workers when temperatures are extreme, and what precautions are to be taken.
 - Adjust and adapt work schedules/procedures to effectively reduce the risk of injury and/or illness due to heat/cold stress. If possible, postpone strenuous work until a cooler time of day.
 - Ensure rotation includes breaks in climate-controlled areas, this can include shaded areas for hotter temperatures. Monitor the temperature (and humidex) listed for area. Implement a job rotation program with work/rest cycles adjusted accordingly.
 - Use mechanical aids for material handling, such as dollies, carts, lifting devices etc. to reduce physical activity
 - Encourage workers to keep hydrated. It is recommended in the OHCOW Heat Stress Awareness Guide (page 9 under Controls) to drink approximately one cup of water every 20 – 30 minutes to prevent dehydration.
 - Establish a first aid response system that provides a means to record and report extreme temperature related incidents.
 - i. An employee who is suffering from a heat or cold related illness should not be left alone.
 - ii. If an employee becomes disoriented or confused and has stopped sweating, and their skin is hot/dry call 911 immediately (Heat Stroke).
 - Workers are allowed time to properly acclimatized when performing work in areas where extreme temperatures exists, this can take two weeks.
 - Encourage workers to use a buddy system. Each buddy looks out for early signs and symptoms of heat stress in their other.

- Relief measures (drinking water, rest periods scheduled) are available and implemented,
 - Staff are.
- c) All workers shall:
- Understand the signs and symptoms of heat/cold stress.
 - Report to their supervisor any personal or if another worker is showing signs or symptoms.
 - Maintain hydration levels by trying to drink a cup of water every twenty to thirty minutes.

III. Procedure

Heat Stress

- a) Workers are encouraged to consider the following personal control measures:
- Avoid eating large meals before working in hot environments.
 - Avoid beverages other than water.
 - Wear light weight clothing.
 - Cover your head and wear sunscreen if working outside.
- b) Workers on medication or with pre-existing medical conditions may be more susceptible to heat stress because some medication and/or medical conditions may impair the body's response to heat. Such workers should speak to their personal physicians to see if their medication(s) and/or health condition(s) affect their ability to work in hot environments.
- c) Heat Stress Risk Factors to consider:
- Air temperature and humidity
 - Radiant heat from hot surfaces or sun
 - Amount of internally generated (muscle use) metabolic heat due to exertion
 - Type of clothing worn
 - Individual susceptibility (age, physical condition, medications, etc.)
- d) Procedure to assist a "heat stressed" employee:
- Employees should continuously monitor one another during hot weather and report to their Supervisor any signs or symptoms that they or a co-worker is experiencing

Cold Stress

- e) Workers are encouraged to consider the following personal control measures:
- Dress appropriately for the cold weather and use multiple layers of clothing to keep warm.
 - Keep moisture off clothes by removing snow prior to entering heated shelters.

While resting in a heated area, perspiration should be allowed to escape by opening the neck, waist, sleeves and ankle fasteners or by removing outerwear.

- A wool knit cap or a liner under a hard hat can reduce excessive heat loss.
- Wear one pair of thick, bulky socks or two pairs - one inner sock of silk, nylon, or thin wool and a slightly larger, thick outer sock.
- Drink fluids often especially when doing strenuous work. For warming purposes, hot non-alcoholic beverages or soup are suggested. Caffeinated drinks such as coffee should be limited because it increases urine production and contributes to dehydration.
- If fine manual dexterity is not required, gloves should be used below 4°C for light work and below -7°C for moderate work. For work below -17°C, mittens should be used. Wool and synthetic fibers are best for gloves and mittens.
- In extremely cold conditions, where face protection is used, eye protection must be separated from the nose and mouth to prevent exhaled moisture from fogging and frosting eye shields or glasses.

IV. Distribution

- A copy of the heat stress plan and Signs and Symptoms of Heat Stress Chart shall be posted on H&S boards from April – November.
- A copy of this Safe Job Procedure will be available in the Site Safety Plan.

V. Reference Documents

- Signs and Symptoms of Heat Stress Chart
- Signs and Symptoms of Cold Stress Chart

Health & Safety Manual Attachments
Element 4
4.2 Extreme Temperatures

SIGNS AND SYMPTOMS OF HEAT STRESS CHART

Sign	Cause	Symptoms	Treatment	Prevention
Heat rash	Hot humid environment, plugged sweat glands.	Red bumpy rash with severe itching.	Change into dry clothes and avoid hot environments. Rinse skin with cool water.	Wash regularly to keep skin clean and dry.
Heat cramps	Heavy sweating from strenuous physical activity drains a person's body of fluid and salt, which cannot be replaced just by drinking water. Heat cramps occur from salt imbalance resulting from failure to replace salt lost from heavy sweating.	Painful cramps occur commonly in the neck, worked muscles (arms, legs or stomach); this can happen suddenly at work or later at home. Heat cramps are serious because they can be a warning of other more dangerous heat-induced illnesses.	Move to a cool area, loosen clothing, gently massage and stretch affected muscles and drink cool salted water (1½ to 2½ mL in 1 litre of water) or balanced commercial fluid/electrolyte replacement beverage. If the cramps are severe or don't go away after salt and fluid replacement, seek medical aid. Salt tablets are not recommended.	Reduce activity levels and/or heat exposure. Drink fluids regularly. Workers should check on each other to help spot the symptoms that often precede heat stroke.
Fainting	Fluid loss, inadequate water intake and standing still, resulting in decreased blood flow to brain. Usually occurs in non-acclimatized persons.	Sudden fainting after at least two hours of work; cool moist skin; weak pulse.	GET MEDICAL ATTENTION. Assess need for cardiopulmonary resuscitation (CPR). Move to a cool area; loosen clothing; have the person lie down, and if the person is conscious, offer sips of cool water. Fainting may also be due to other illnesses.	Reduce activity levels and/or heat exposure. Drink fluids regularly. Move around and avoid standing in one place for too long. Workers should check on each other to help spot the symptoms that often precede heat stroke.
Heat exhaustion	Fluid loss and inadequate salt and water intake causes a person's body's cooling system to start to break down.	Heavy sweating; cool moist skin; body temperature over 38°C; weak pulse; normal or low blood pressure; person is tired and weak and has nausea and vomiting; is very thirsty; or is panting or breathing rapidly; vision may be blurred.	GET MEDICAL ATTENTION. This condition can lead to heat stroke, which can cause death quickly. Move the person to a cool shaded area; loosen or remove excess clothing; provide cool water to drink; fan and spray with cool water. Do not leave affected person alone.	Reduce activity levels and/or heat exposure. Drink fluids regularly. Workers should check on each other to help spot the symptoms that often precede heat stroke.

10 | Page Approved: August 2018 Version: 0

Health & Safety Manual Attachments

SIGNS AND SYMPTOMS OF COLD STRESS CHART

Sign	Cause	Symptoms	Treatment	Prevention
Frost bite	Skin tissue temperature falls below the freezing point (0°C/32°F), or when blood flow is obstructed. Blood vessels may be severely and permanently damaged, and blood circulation may stop in the affected tissue.	Mild case: inflammation of the skin in patches accompanied by slight pain. Severe case: tissue damage without pain, or there could be burning or pricking sensations resulting in blisters.	Frostbitten skin is highly susceptible to infection, and gangrene (local death of soft tissues due to loss of blood supply) may develop. 1. Move the affected person from the source of exposure to a warm area. Seek medical attention, if needed. 2. Gently loosen or remove constricting clothing or jewellery that may restrict circulation. 3. Loosely cover the affected area with a sterile dressing. Place some gauze between fingers and toes to absorb moisture and prevent them from sticking together. 4. Wrap the person in a blanket or warm clothing. 5. Warm the affected area gradually using warm water or body heat. 6. DO NOT rub area or apply dry heat. 7. DO NOT break any blisters. 8. DO NOT allow the victim to drink alcohol or smoke.	Dress appropriately for the cold weather and use multiple layers of clothing to keep warm.
Hypothermia	Excessive loss of body heat and the consequent lowering of the inner core temperature.	Mild case: symptoms may be vague, with sympathetic nervous system excitation (shivering, high blood pressure, fast heart rate, fast	Call 9-1-1. Seek medical help immediately. 1. Remove the person from the source of exposure if safe to do so. 2. Ensure that wet clothing is removed.	Dress appropriately for the cold weather and use multiple layers of

12 | Page Approved: August 2018 Version: 0

4.3 Working at Heights

I. Purpose

- a) To prevent injuries when working from heights on our job sites,
- b) Describe the requirements for any person who will be working heights for ROSSCLAIR or behalf of ROSSCLAIR.
- c) This procedure applies to all ROSSCLAIR job sites; however, Contractors will be required to follow their own procedures provided they meet or exceed ROSSCLAIR's requirements. Unless an approved Contractor is selected, the ROSSCLAIR personnel responsible for engaging the Contractor must perform a health and safety review of the Contractor in accordance with our company policy.

II. Responsibilities

- a) Senior Management shall ensure that:
 - This procedure is implemented and adhered to on all job sites.
 - The resources and training have been provided to personnel to do the work safely.
- b) Project Manager and Site Supervisors shall ensure that:
 - Only workers who have been received Working at Heights training can work at heights.
 - All precautions are used to the extent necessary to protect the health and safety of persons either performing or affected by the activities.
 - A fall protection plan is created and implemented for each job site.
 - Hazards related to working at heights are identified and evaluated and be familiar with applicable OH&S Legislation and CSA requirements.
 - Provided equipment, is in good repair, regularly inspected and certified as required.
 - Qualified individual is available onsite to administer CPR and first aid.
 - Unsafe conditions are corrected, as appropriate, and to stop work if conditions are unsafe.
 - All components of a fall protection system involved in a fall occurrence are removed from service, and ensure it is destroyed and replaced with new equipment.
- c) Workers shall:
 - Read, understand and comply with the provisions of this Working at Heights and Fall Protection Procedure, as applicable to their role.
 - Understand the scope of work and comply with the appropriate procedures.
 - Assist in identifying and evaluating hazards related to working at heights and to assist in determining and carrying out the required control measures.
 - Use and wear protective equipment as required by the plan and by applicable OH&S Legislation.

- Inspect all fall protection equipment before and after use for any deficiencies and/or damage
- Remove all components of a fall protection system that have been involved in a fall occurrence and ensure that it is destroyed and replaced with new equipment

III. Definitions

Anchor – A secure point of attachment for lifelines or lanyards that can withstand the loads of 22.2 kilonewtons or greater.

Connector – A component or element used to couple parts of the system together, such as a lifeline to an anchorage using a carabiner (as self-closing/self-locking connector) as an anchorage connector.

Fall Arrest – Stopping a fall which has occurred before the Worker hits the surface below.

Fall Protection Plan – The written plan developed in advance of working at heights.

Fall Restraint – The use of a work positioning system to prevent Workers from falling from the level in which they are working or a travel restriction system to prevent Workers from traveling to an edge from which they may fall.

Free Fall Distance – The distance from the point where the Worker would begin to fall to the point where the fall-arrest system begins to cause deceleration of the fall.

Full Body Harness – A configuration of connected straps to distribute a fall arresting force over at least the thigh, shoulders, and pelvis with provisions for attaching a lanyard, lifeline or other components.

Lanyard – A flexible line of webbing, rope, or cable used to secure a safety belt or full body harness to a lifeline or anchor.

Lifeline – A line from a fixed anchor or between two horizontal anchors and used for attachment of a worker's lanyard, safety belt, full body harness, or other device.

Safety Belt – A body support component comprised of a strap with a means of securing it about the waist and for attaching it to other components.

Self-Retracting Device (SRD) – A device that performs a tethering function while allowing vertical movement (below the device) to the maximum working length (the effective length from the load-bearing point on the housing, to the load-bearing point on the bottom connector) of the device, which will arrest a user's fall. A SRD has housing, normally attached to the anchorage of a fall arrest system that contains a drum-wound lifeline. The retraction end of the lifeline will unwind from the drum under slight tension during the normal movement of the user below the device. When tension is removed, the drum will automatically retract the lifeline. Quick movement such as is typically applied in a fall will lock the drum, arresting the user's motion.

Shock Absorber – A component whose primary function is to dissipate energy and limit deceleration forces which are imposed on the body during Fall Arrest. With a shock absorber in place a Free Fall Distance of 6½ feet is permitted in a Fall Arrest system.

Snap Hook – A self-closing/self-locking Connector. The snap hooks provide an eye for permanent attachment of a Lifeline or Lanyard. Some snap hooks have an eye which

swivels relative to the hook.

IV. Procedure

- a) Compliance with safe job procedures (may be developed jointly with ROSSCLAIR and the Subcontractor/Contractor) and any other procedure or standard applicable to the work.
- b) A fall protection plan is required to be created and implemented at each job site requiring workers to perform tasks where they are subjected to potential fall hazards (from heights or below). The fall protection plan includes:
 - i. Hazard assessments are undertaken, and control measures implemented to eliminate or reduce the risk of falls as far as practicable. Hazards have been reviewed with all personnel.
 - ii. Workers are trained in fall prevention systems and risk assessment techniques.
 - iii. Emergency procedures are established to enable the rescue of a Worker in the event of a fall occurring and the administering of first aid as soon as possible after the emergency occurs.
 - iv. The equipment provided to control the risk of falls is designed and constructed for the task and the working environment and conforms to applicable Legislation and CSA standards.
- c) Development of Fall Protection Plan
 - i. Each job site must develop its own Fall Protection Plan that details specific plans that will need to be followed as well as provide site specific guidance for onsite ROSSCLAIR personnel.
 - ii. Priority will be given to eliminating the need to work at heights. This can be done by engineering out the need to do the work at heights, or contracting out the work to qualified, competent, knowledgeable persons. Those tasks that cannot be engineered out will be controlled by installing or using the following:
 - Permanent walkways with guardrails.
 - Mobile access platforms/scaffolds.
 - Fall Arrest systems/Fall Restraint systems.
 - iii. The guidelines for the plan will include:
 - A. Identifying fall hazards using Fall Protection Hazard Assessment Form based on type on work activity, location of equipment, access to areas and weather conditions.
 - B. Determining control methods: The primary duty is to eliminate the risk. If this is not practicable, the risk must be reduced to “As Low As Reasonably Practicable” (ALARP).
 - C. Ensuring compliance with safe work procedures and any other procedure applicable to the work.

- D. Ensuring individual fit testing of PPE.
 - E. Ensuring the Fall Protection Plan includes a rescue plan component and all rescue equipment is readily available.
 - F. Ensuring only competent Workers and Contractors trained in Working at Heights, can carry out high risk activities that involve working at heights.
 - G. Checking all Contractor equipment and certification before work commences.
 - H. Ensuring that a Rescue Plan is in place in case of an emergency.
 - I. Removing all components of a Fall Restraint system that has been involved in a fall occurrence and ensure it is destroyed and replaced with new equipment and maintain records.
- d) Preplanning - Steps to take before the work commences include:
- i. Inspection of any guard rails, ladders and scaffolds required for the job.
 - ii. Only workers who have been trained and are experienced to do the work will be assigned such work.
 - iii. General hazards pertaining to working at heights will be discussed at the start of the job and noted in the pre-job meeting.
 - iv. If using a fall protection system, review the Fall Protection Plan with all affected workers.
 - v. Obtain barriers and signs to be used in the vicinity of the work being done.
- e) Inspection of Guardrails and Ladders
- All guardrails and ladders will be inspected by a trained worker before each use, and thoroughly examined for defects each year.
 - Defective guardrails and ladders will not be used and will be immediately reported to the Supervisor.
- f) Inspection of Scaffolds
- Scaffolds will be constructed and certified by a competent person before any work begins on said scaffold.
 - All scaffolds will be inspected and “tagged” before use by a trained scaffolder and thoroughly examined for defects prior to each use or at least every 21 days, during continuous use.
 - The following tags will be used when inspecting scaffolds:
 - Green Tag – “Safe for Use” with date and name of the inspector at each entry point on the scaffold.
 - Yellow Tag – “Caution: Potential Hazard” with date and name of the inspector and the nature of the Hazard, at each entry point on the scaffold, if the

inspector identifies an unusual or potential hazard.

- Red Tag – “Unsafe for Use” with date and name of the inspector at each entry point on the scaffold and must not be used for any reason. Must be immediately reported to the Supervisor and immediately removed from service.

g) Ladders and Scaffolds

- Workers working at heights will follow the safe work practices provided in the training, the instructions of the Supervisor, this Working at Heights Procedure and the applicable OH&S Legislation.
- As required, where there is any inconsistency the worker shall seek guidance from the Supervisor prior to work commencing.

h) Guardrails

- Guardrails with top and mid-rails and toe board are required for all elevated working surfaces. These guardrails will be installed according to design criteria and have:
 - Top rail located between 90 – 1100 mm
 - Mid-rail located halfway from top member and the base
 - Toe boards will be installed at the outer edge of all walkways, platforms, mezzanines or catwalks that are above any work or traffic area and all scaffolds. They will be placed less than 6 mm above the work surface and rise to a height greater than 89 mm
 - vertical supports at both ends of the horizontal rails with intermediate vertical supports that are no greater than three meters apart at their centers
- All walkways, platforms, mezzanines and catwalks will have guardrails if a worker has the potential to fall more than 1.2 meters.

i) Fall Protection Systems

- All workers working at heights above 3 m will use a fall protection system (or less than 3 m if the fall will be onto a hazardous surface).
- A fall protection system has two primary processes: Fall Arrest and Fall Restraint.
 - Fall Arrest includes the full body harness and a lifeline which will be attached to a fixed anchor point and must not allow the worker to fall more than 1.5m (5 ft.) from the working surface.
 - Fall Restraint, includes a safety belt and a restraining line, will be used when working on a deck or roof from which a worker can fall 3m (10ft). The restraining line must be securely fastened to a fixed anchor point and must not allow the worker to go farther than 2 m (6 ft.) from the edge of the deck or roof.

j) General Guidelines for Fall Protection Systems, Scaffolds & Ladders

- The Project Manager and Site Supervisor for each ROSSCLAIR work location must determine what system is needed for each application; either a Fall Arrest system or a Fall Restraint system or both.
 - The Fall Arrest system uses a body harness, lifelines, lanyards and a variety of deceleration devices. The Fall Restraint system utilizes lifelines, lanyards and a body harness. A safety belt can be used – however it is not recommended. Never mix components from the two different systems.
 - Proper training for workers is essential for any system in place.
 - Workers using Fall Arrest systems must never work alone.
 - Daily pre-use inspections should be done by the worker and semi-annual inspections performed by a competent person in these types of systems.
 - Documentation shall be maintained for every piece of equipment in the fall protection system.
 - Free fall distance must always be kept in accordance with applicable OH&S Legislation.
 - Re-evaluate fall protection systems on an ongoing basis, at least annually.
 - Store equipment in a clean, dry, dust free place away from direct sunlight. Coiling ropes and lines and hanging them and the body harnesses is recommended.
- k) Full-Body Harnesses and Safety Belts
- Clearly distinguish which is to be used, train workers in the difference and when each one should be used.
 - If a harness fails the formal inspection process, it must be marked UNUSABLE and removed from service.
 - Look for cuts, abrasion or open stitching, chemical or heat damage.
 - Inspect the D-ring for distortion, cracks, or other damage.
 - Adjustment plate holding the D-ring should be free from distortion, cracks or other damage.
 - Check for kinks and twists once harness is put on.
 - Clean harnesses when task is completed. It is preferable to use mild detergents. DO NOT use solvents when cleaning belts and harnesses.
- l) Lanyards
- Lanyards should be of the appropriate type, either Fall Arrest or travel restraint type lanyards.
 - Never tie knots in lanyards to shorten them.

- Lanyards must be retired immediately under the following conditions:
 - when an integral shock absorber has been totally or even partially deployed; or
 - if the lanyard has been used for any purpose other than fall protection.
 - A retired lanyard should be cut in two to ensure it is never used again.
 - Most lanyards have a service life of 5 years, check the manufacturing date.
- m) Shock Absorbers
- Check the outer jacket for signs of damage.
 - Check the end loops for damage, cracks, etc.
 - Remove a shock absorber if found to be damaged.
- n) Snap Hooks
- Snap hooks must be connected to compatible hardware and must never be attached to another snap hook.
 - Check the snap hook for damage, pitting, and distortion.
 - Ensure that the spring has enough tension to close the keeper.
 - Ensure that the keeper and locking mechanism work properly without binding, and without excessive lateral play.
- o) Ropes/Lifelines
- Ropes should be kept clean.
 - Do not use knots in ropes since this reduces their strength by up to 50%.
 - Rope must always be protected over sharp edges.
 - All rope material should be stored away from heat and direct UV light.
 - Always look for areas where the rope material is separating and out of shape. Check for broken fibres and severely worn areas of the protective sheath.
 - Do not allow rope to come into contact with acids, oils, or other chemicals.
 - Ropes of natural fibres must never be used for vertical lifelines.
 - All ropes involved in actual falls must be reported to the person inspecting the Fall Arrest equipment.
 - Vertical lifelines should be at least 16mm diameter polypropylene or other material of equal strength.
 - Check the eyes of the rope for deformities or cracks.
 - Different types of ropes exist; kern mantle, braided, twisted, manila, hemp, jute,

nylon, polyester, polypropylene, polysteel, Kevlar, spectra, etc. One should know the type to use for the application and use only the type specified for the job.

- Safe use of ropes requires skill, training and practice; please ensure that the user is qualified and is aware of the limitations.

p) Rope Grab

- Ensure that it is mounted right side up, look for the directional arrow.
- Check for corrosion, distortion, and secure mounting.

q) Anchor Points

- All components of an anchor system must be inspected. Always consult the manufacturer's recommendations for use, inspection, care and maintenance.
- Inspections are to be carried out at a frequency that meets applicable OH&S Legislation by a qualified Contractor.
- Do not use one anchor for multiple lifelines, unless, the anchor is engineered for more than one person. This information will be found in a site-specific Fall Protection Plan. If uncertain, then assume anchor is for one person only.
- Anchors should be able to withstand a minimum of 10 times the weight of the person using the Fall Arrest system. Typically, vertical fall arrest anchor points are required to withstand 22 kilonewtons.
- Horizontal Fall Arrest anchor is required to withstand a 71 kilonewton force, and a Fall Restraint anchor point is required to withstand a 4 kilonewton force.
- Do not confuse Fall Arrest Anchor points with Fall Restraint Anchor points; clearly mark if both are used in your facility.

r) Webbing

- Inspections should be conducted monthly.
- Inspect all webbing for tears, fraying, or other damage and document the inspection results.
- Ensure grommets are not loose, broken.
- Inspect tongue area of belt or harness for normal or unusual wear.

s) Self-Retracting Devices (SRD)

- The SRD, the locking mechanism, and the braking mechanism must always be inspected prior to and after each use and according to the manufacturer's recommended frequency.
- Usually needs to be certified on a yearly basis (or sooner based on the working environment) by the manufacturer or an approved agent.
- Due to the nature and complexity of the SRD, overhaul, inspection and

maintenance should be left to a competent and knowledgeable person.

t) Scaffolds

- Erection of a scaffold must be done by a competent person knowledgeable in scaffold erection.
- Inspections and tagging of scaffolds must be done by a competent person, prior to use.
- Barriers and signs should be used near the work being done.
- Castor wheels on rolling scaffolds must have locks on them which must be engaged when the scaffold is in use; should only be used on flat, hard ground or flooring.
- Never remain on a rolling scaffold when it is being moved at any time for any reason.
- Never exceed the specified working load.
- All components should be inspected routinely or as specified by the manufacturer; documentation of inspections should be retained.
- Toe boards should be used on scaffolds to prevent items from falling off.
- Handrails and mid-rails must be in place.
- Never exceed the base to height ratio recommended by the manufacturer. These vary depending on the type of scaffold.
- On a rolling scaffold, never exceed the base to height ratio of 3 times the shortest base dimension.

u) Guardrails

- Guardrails are to be constructed of material adequate to support the load that potentially will be applied to it.
- Guardrails are to be constructed according to their specifications.
- Materials should be inspected to ensure an acceptable standard.
- Use guardrails along the open sides of any area where a worker could fall.
- Temporary guardrails may replace the horizontal mid-rail with heavy duty mesh, or solid wood that is strong enough to resist any expected forces it may be subject to and is securely attached to the top rail, toe-boards and vertical members.
- Install guardrails at the edges of floor openings, stairways, landings, rooftops, scaffolds, shafts, etc.
- Secure rails, toe boards to the inside of posts or jacks.
- Follow Regulatory Authority data sheet on guardrails.

v) Ladders

- Develop a procedure on ladders that covers use, inspection, storage and disposal that complies with CSA CAN-3-M81.
- Establish safe use and storage practices for the ladders.
- Make sure they are followed.

w) Straight Ladders

- Use the right ladder for the job.
- Inspect the ladder before and after use to ensure that it complies with CSA CAN-3- M81.
- Tag and remove defective ladders.
- Get help when moving heavy or long ladders.
- Make sure that your shoes are safe; not wet or muddy.
- Put the ladder up correctly – one foot back for each four feet up.
- Ensure the ladder is extended at least 1 metre beyond the top surface to allow for safe access and egress.
- Secure the top of the ladder to restrict movement.
- Where there is the danger of traffic, have someone hold the ladder. Post a warning sign, if Hazard Assessment deems necessary.
- Secure the top and bottom of the ladder if using it to access a platform or scaffold.
- Face the ladder when ascending or descending.
- Hoist materials in a pail or tool-bag or attach them to a belt.
- Do not carry materials in your hands.
- Always maintain 3-point contact with the ladder.
- Make sure that only one person at a time is on the ladder.
- Don't stretch beyond the side rails of the ladder.
- Never stand any higher than the third rung from the top of a ladder.
- Keep metal and wet wooden ladders away from live electrical circuits.

x) Stepladders

- Never use a stepladder as a straight ladder.
- A worker must not perform work from either of the top two rungs, steps or cleats of a portable ladder.

- Lock the stepladder; spread the legs to their limit and ensure the braces are locked.
- Ensure you use the appropriate size/height of ladder to reach the desired work height.

y) Ladder Inspection and Maintenance

- Inspect for common defects such as broken rungs, split side rails, worn or broken safety feet, or oil and grease which can make climbing surfaces slippery.
- Ladders that cannot be safely repaired are to be immediately taken out of service and destroyed with appropriate records maintained.
- Repairs which include tying or binding with wire are prohibited.
- The painting of ladders is prohibited as this can hide cracks or weak points.
- Regularly inspect safety feet for damage, particularly if stored and used outdoors and in extreme weather conditions.

V. Distribution

- a) A copy of this document will be available in the Site Safety Plan.
- b) A completed Fall Protection Plan must be submitted with documentation following the completion of a project.
- c) All workers who will be required to work at heights will be trained in the use of fall protection systems and safe work practices as per the requirements of Regulation 297/13. Time taken to participate in mandatory working at heights training will be deemed time at work.
- d) ROSSCLAIR will pay any fees and appropriate expenses associated with the training.

VI. Reference Document

- Fall Protection Plan
- Fall Protection Hazard Assessment Form

4.4 Working with Asbestos

I. Purpose

To identify hazards and the necessary controls to protect workers who will be at project sites where asbestos containing material (ACM) is present. This procedure only applies to working with Asbestos only.

II. Responsibilities

a) Senior Management shall ensure that:

- This procedure is implemented and adhered to on all job sites.
- The resources and training have been provided to personnel to do the work safely.
- This document is periodically reviewed for adequacy.

b) Project Manager and Site Supervisors shall ensure that:

- Only workers who have been received Asbestos Awareness training can work on sites with contained asbestos.
- Only workers (including Subcontractors/Contractors) who have Type I – III training, as appropriate, can perform the type of work outlined in the Designated Substance - asbestos on construction projects and in buildings and repair operations (Ontario Regulation 278).
- All precautions are used to the extent necessary to protect the health and safety of persons either performing or affected by the activities.
- Hazards related to type of work performed are identified and evaluated and be familiar with applicable OH&S Legislation and CSA requirements.
- Provided equipment, is in good repair, regularly inspected and certified as required.
- Unsafe conditions are corrected, as appropriate, and to stop work if conditions are unsafe.

c) Workers shall:

- Read, understand and comply with the provisions of this safe job procedure, as applicable to their role.
- Understand the scope of work and comply with the appropriate procedures.
- Assist in identifying and evaluating hazards related to working with asbestos and to assist in determining and carrying out the required control measures.
- Use and wear the required personal protective equipment.
- Inspect all respiratory equipment prior to use to check for any deficiencies and/or damage.

III. Procedure

- a) Consideration to the following in minimizing the potential for exposure:
 - Minimizing the exposure of Asbestos materials to workers;
 - Risk assessment- this will include an assessment of the condition of the ACM, its friability, accessibility and likelihood of damage, and the potential for fibre release and exposure of workers. The Occupational Health and Safety Regulation lists an occupational exposure limit for asbestos fibres in the air of 0.1 fibres per cubic centimetre (f/cc), however it is mandatory to reduce the levels as low as reasonably achievable below the Exposure Limit.
 - Checking all material deliveries to validate that components are safe for handling;
- b) Planning – Design and Pre-Construction
 - Infection Control participation is critical in the initial planning and approval meeting during the design phase.
 - Discussion on budget surrounding space constraints including storage and equipment cleaning areas, air handling units, hand washing facilities, appropriate finishes, specific product information regarding intrusion implications and applicable regulations.
- c) Design and Structure
 - Infection Control will ensure that major components are addressed as appropriate and justified by relevant guidelines, standard codes and regulations. The following are major components that need to be addressed:
 - Design to support Infection Control practice
 - Design, number and type of isolation rooms (i.e. airborne infection isolation or protective environment)
 - Number, type and placement of hand washing fixtures, clinical sinks, dispensers for hand washing soap, paper towels and lotions
 - Sharps disposal unit placement
 - Accommodation for personal protection equipment
 - Surfaces; ceiling tiles, walls, counters, floor covering and furnishings
 - Storage of movable and modular equipment
- d) Controls
 - Elimination
 - Wherever possible, replacement or substitution of asbestos containing materials should be taken into consideration wherever possible to reduce the potential exposure to workers. If a material does not need to be sampled, then such disturbance should be avoided.

- Barrier
 - A barrier shall be established to isolate the work area from the rest of the project and to prevent entry by unauthorized workers. The abatement work area shall be delineated with asbestos hazard barrier tape a minimum of 6 feet away (or as best as reasonably possible) from the edge of the abatement. Warning signs indicating the asbestos hazard shall be posted at all conceivable approaches to the work area. Where the work area is to be contained with physical barriers, they must be constructed with double 6 mil poly or equivalent
 - Wetting
 - Before disturbing any asbestos-containing materials, all surfaces of the material shall be sufficiently wetted with amended water with hoses, misting cans or misting bottles taking care not to disturb the material to be removed.
 - Containment of waste
 - Asbestos-containing materials, waste and dust will be contained and removed promptly in 6 mil polyethylene bags marked with Asbestos warning markings. The Asbestos Waste bag is then sealed in a goose neck fashion with duct tape and placed in a second Asbestos Waste bag which is again sealed in a goose neck fashion. Where use of Asbestos Waste Bags is not practicable, wastes shall be wrapped and sealed in double 6 mil poly and marked with an Asbestos Warning Sticker or marked appropriately with other means.
 - HEPA vacuuming
 - A Certified and tested HEPA-filtered vacuum cleaner shall be used to for personal decontamination and for cleaning up any potential dust or debris before and after the work activity begins.
 - Tool Restriction
 - Power tools may be used in a limited manner, for example a small circular saw blade attached to a standard hand-held drill may be used for drywall cuts with a dust collection system in place. Such a system includes an industrial vacuum cleaner equipped with a HEPA filtering system. The dust is collected and drawn into the vacuum, where it is filtered, and the air is discharged. If a saw is used, visually monitor dust release from equipment during use. When tools and equipment are working properly, very little dust should be visible in the air. Stop work if excessive dust is observed. Generally power tools will release excessive levels of asbestos fibres into the atmosphere and potentially cause over-exposure of employees, contractors and the public.
- e) Housekeeping
- Maintaining adequate housekeeping
 - Cleaning to include area clearance
 - Cleaning and replacement of filters and other equipment if affected by major or

minor disruptions or conditions that could have contaminated the air or water supply

f) Personal Protective Equipment

- Workers are to wear respiratory protective equipment when the airborne concentration of the asbestos cannot be reduced below its occupational exposure limit. If a worker may be exposed to asbestos dust during abatement activities, they must wear protective clothing.
- Ensure workers have read and understand SDS indicating required PPE
- Ensure workers have access to and use adequate PPE

g) Training

- i. Workers working with Type 1, Type 2 or Type 3 asbestos operations will receive training that meets the regulatory requirements. Workers are provided training on the hazards of asbestos exposure, safe handling requirements and personal hygiene work practices.
- ii. Where construction work is to be performed on any facility, it is extremely important that workers be informed of the following at worker orientation sessions:
 - Exposure to Asbestos may cause adverse health effects;
 - Adequate measures must be implemented to reduce exposure, reduce and eliminate hazards.
 - Instruction will be given on the use, cleaning and disposal of the required PPE
- iii. The Site Supervisor will keep a copy of all provided record of training (ROT) for Subcontractors/Contractors performing work on behalf of ROSSCLAIR.
- iv. Workers are expected to keep a record of training, wallet card or equivalent, with them while performing work at the jobsite. This ROT must be readily available at all times.

IV. Distribution

- a) A copy of this Safe Job Procedure will be available in the Site Safety Plan.
- b) A copy of this Safe Job Procedure will be provided to any Subcontractor/Contractor working on behalf of ROSSCLAIR at a jobsite where ACM are present.

4.5 Energy Isolation and Lockout

I. Purpose

- a) To communicate the requirements for the Lockout program. The lockout program shall be used to ensure the safety and health of personnel where the unexpected start-up or release of stored or residual energy could cause injury.
- b) To ensure there is a standardized method for the lockout/tagout of energy sources on our sites.
- c) To establish the minimum requirements for the lockout of energy isolating devices. It shall be used to ensure that a machine or piece of equipment is isolated from all potentially hazardous energy and locked out before employees perform any servicing or maintenance activities where the unexpected energization, start-up or release of stored energy could cause injury.

II. Responsibilities

- a) Senior Management shall ensure that:
 - This procedure is implemented and adhered to on all job sites.
 - The resources and training have been provided to personnel to do the work safely.
- b) The Site Supervisor is responsible for:
 - Ensuring that Subcontractors/Contractors are complying with energy isolation and lockout requirements. Periodic documented observations and inspections of work identified as requiring energy isolation (as per Daily Hazard Assessment or critical task list) being performed by a Subcontractors/Contractors is required.
 - Establishing and implementing written procedures for compliance with electrical lockout, gas and water procedures.
 - Providing training on safe lockout procedures to all authorized staff.
 - Ensuring that only authorized employees perform lockout/tagout in accordance to procedures are identified and that unauthorized employees do not.
 - Properly enforce the lockout policy and procedure
 - Providing a copy of this document to Subcontractors/Contractors who do not have an Energy Isolation and Lockout procedure within their own health and safety program.
- c) Workers shall:
 - Read, understand and comply with the provisions of this safe job procedure, as applicable to their role.
 - Understand the scope of work and comply with the appropriate procedures.
 - Assist in identifying and evaluating hazards related to working with energy isolation and to assist in determining and carrying out the required control measures.

- Use and wear the required personal protective equipment. Never rely on someone else's lock. One lock – one person.

III. Definitions

Energy Sources - Types of energy that the lockout procedure is meant to guard against include, but are not limited to, electric, hydraulic, pneumatic, mechanical, gas, water, steam, chemical, thermal, etc.

Lockout - A method of isolating energy from being set in motion and endangering worker. Lockout includes the placement of a mechanical device (lock) on an energy-isolating device to ensure the equipment cannot be accidentally energized until the lockout device is removed.

Tagout - The placement of a tag device on the locked-out energy source indicating that the energy source/device is being controlled and may not be operated until the tagout device is removed.

IV. Methodology

a) When to Use Lockout

Lockout whenever you are performing service of maintenance around any machine where you could be injured by:

- Unexpected start-up of the equipment; or
- Release of stored energy.

i. Two situations are most likely to need lockout:

- ✓ When you must remove or bypass a guard or other safety device.
- ✓ When you must place any part of your body where you could be caught by moving machinery.

ii. Some jobs for which lockout shall be used are:

- ✓ Repairing electrical circuits
- ✓ Cleaning or oiling machinery with moving parts
- ✓ Clearing jammed mechanisms
- ✓ Replacing a control unit or valve
- ✓ Performing preventative maintenance

Note: Locks by themselves do not de-energize equipment. Attach them only after the machinery has been isolated from its energy sources

iii. Locking out is not required, if the conductors are adequately grounded with a visible grounding mechanism or if the voltage is less than 300 volts and there is no locking device for the circuit breakers or fuses and procedures are in place adequate to ensure that the circuit is not inadvertently energized

b) Elements of a Lockout Program

Determine:

- ✓ What energy sources will be locked out.
- ✓ If locks can be applied.
- ✓ Who will apply locks
- ✓ If more than one crew or employee will be working on the equipment.
- ✓ The sequence to follow, such as:
 - Preparations for shutdown - including notifying the operator
 - Equipment shutdown
 - Equipment isolation
 - Applying lockout devices
 - Control of stored energy
 - Verify isolation of equipment

c) Prepare to remove locks, but first be sure that:

- All safety guards are back in place
- Work is complete, and tools are put away
- Workers are positioned safely for start-up
- Controls are positioned correctly for re-energization

d) Removal of the lock/tag by the person who applied it.

- Notify the operator when all the locks/tags are removed, the safeguards replaced, and the equipment are ready for operation.

e) Special situations include but are not limited to:

- Maintenance by outside contractors
- Temporary re-activation of equipment being worked on
- Servicing that lasts more than one work shift
- When the worker who applied a lock is not there to remove it
- Procedures must be established to assure that special situations are corrected in a safe manner

f) If a tag is used as a means of communication, the tag shall:

- a. Be made of non-conducting material;
- b. Be secured to prevent its inadvertent removal;
- c. Be placed in a conspicuous location;
- d. State the reason the switch is disconnected and locked out;
- e. Show the name of the worker who disconnected and locked out the switch; and
- f. Show the date on which the switch was disconnected and locked out

V. Procedure

a) Electrical System:

The power supply to electrical installations, equipment, or power lines shall be locked out of service prior to, and while, work is being conducted on or near them. However, if this is not practical, an alternative measure must be taken. Before beginning the work, each worker performing the task shall determine if the above requirements are completed.

b) Mechanical Systems

When the starting up of machines, transmission machinery or devices that may injure a worker, control switches or other control mechanism must be locked out as well. Other precautions deemed necessary to prevent any unplanned energy release may also be implemented. Mechanical equipment in a confined space must be locked out before anyone enters the confined space.

- i. Controls must be locked in the off position and a separate lock provided for each person working on the equipment.
- ii. Each worker must always place their own lock on the disconnect switch or on a multiple lockout bar and retain their own key.
- iii. If more than one worker is involved in the work, the worker who disconnected and locked out the power supply must communicate the purpose and status of the lockout by attaching a warning tag or sign on the padlock.
- iv. A tag used as a means of communications must:
 - Be made of non-conducting material
 - Be secured to prevent its inadvertent removal
 - Be placed in a conspicuous location
 - State the reason that the switch is disconnected and locked out
 - Show the name of the worker who disconnected and locked out the switch
 - Show the date on which the switch was disconnected and locked out
- v. The tag must also be:
 - Durable and unique
 - Standardized as to colour, shape, size, format
 - Substantial enough to minimize the probability of accidental removal
 - Placed by the other workers' locks. Each tag must show the worker's name and department/company

c) Steps to a successful lockout:

- i. Applying a lock and/or tag
 - a) Alert affected personnel about the lockout
 - b) Identify all energy sources

- c) Isolate or neutralize all energy sources
 - d) Attach tagout notice to device
 - e) Dissipate or block any stored energy (i.e. blanking, bleeding)
 - f) Verify zero energy state using appropriate methods before conducting any work
 - g) Complete work
- ii. Release from tagout
- a) Inspect the area to ensure all nonessential items (i.e. tools) have been removed
 - b) Remove the tagout devices
 - c) Before equipment or process is started or the energy source can flow again the notification of all effected individuals is required

d) Planning

- Make a list of the types and magnitude of energy and hazards in the work area.
- Locate and identify all isolating devices to the machine or equipment to be locked
A list of the types and locations of all energy isolating means must be made.
- More than one energy source may be involved, such as electrical and mechanical.
- A list should be made of the types and locations of all energy isolating means for employees to check.

e) Training

- Notify all affected employees that a lockout system is to be utilized on the project.
- Maintain a list of the names and job titles of all employees who are authorized to lockout the specified machine or equipment.
- A written record must be maintained of all employees who have been educated in the company or projects lockout program.

f) Retraining of all affected employees will be conducted and documented when there is a change in:

- Assignments
- Machines
- Equipment
- Processes
- When lockout inspections reveal a need, or supervision sees a need
- New hazards or changes in the energy control procedure

g) Evaluation

- i. The lockout procedure will be reviewed and revised as work progresses. Any revisions to this procedure will be communicated to all subcontractors/contractors

immediately

- ii. Enforcement is necessary to make sure employees do their part in practicing their own safety and follow the procedures taught to them by their employer.
 - An inspection is to be conducted daily, when applicable, to make sure energy control procedures are being carried out.
 - Anyone who fails to follow these procedures or who tampers with or removes a lockout device without authorization, will be subject to removal from the site.
 - All enforcement guidelines and procedures must be communicated to the employees with their attendance documented in writing consisting of their name, employee number, date of birth, date of training and reason for conducting the training.

VI. Distribution

- a) A copy of this Safe Job Procedure will be available in the Site Safety Plan.
- b) A copy of this Safe Job Procedure will be made available to Subcontractors/Contractors.

VII. Reference Documents

- Lockout Work Flow: Maintenance or Installation (Scheduled Lockout)
- Lockout Work Flow: Defective Equipment/Machinery (Unscheduled Lockout)

4.6 Purchasing Policy

I. Purpose

The procedure is meant to ensure ROSSCLAIR:

- a) Is compliant with all provincial and federal health and safety legislation.
- b) All physical and chemical hazards are properly identified prior to the introduction of a new equipment, process, material or thing.

II. Responsibilities

- a) Senior Management shall ensure that:
 - This procedure is implemented and adhered to on all job sites.
 - The resources and training have been provided to personnel to do the work safely.
- b) The Health and Safety Program Coordinator or designate will review:
 - Disposal requirements, health and safety considerations and legislative requirements before approving such purchase, as per **OHSA 25. (1)**
 - Risk Assessment and identified control measures, such as Safe Work Practices or Safe Job Procedures, to ensure ROSSCLAIR can safely handle the equipment, process, material or thing.
 - Preventative Maintenance and inspection requirements (equipment rental and purchase)
- c) Any ROSSCLAIR employee responsible for the purchase of materials, equipment or the rental of equipment shall alert the Health and Safety Program Coordinator **prior** to purchase or leasing.

III. Procedure

a) Procurement

The following guidelines will help to identify our policy more specifically to the subjects of materials, product machinery, equipment, and chemical substances.

i. Machinery / Equipment / Materials:

Special health and safety specifications for (chains, cables, etc.) will be included in our purchase orders.

ii. Hazardous Materials:

Health and safety exposures will be considered using the principles of control, substitution, elimination of hazardous substances in our workplace activity.
Regulation 860

iii. New Products:

The JHSC will review the new products, equipment and machinery for Health and Safety considerations, as well as assessing cost effectiveness and possible harmful effects to people, property and other organizational assets.

iv. Rental / Lease Services Provided / Received:

For those rental or lease services provided, ROSSCLAIR, in respect to sales, service, or parts, will be responsible for those noted above to clarify our responsibility as to the rental purchase or lease agreement in respect to those records required by the OHSA and regulations that may apply to the maintenance of the said equipment, or to the specific manufacturers' recommendations of the said equipment, for construction, forestry, mining or industrial clients and their activity.

v. Purchase of Machinery, Equipment and Materials

Prior to purchase of any equipment and/or machinery, a thorough investigation will be conducted by the Health and Safety Program Coordinator, Project Managers, Supervisor and a member of the JHSC or HSR to determine degree of compliance with all regulatory requirements.

a) New Chemical

i. The Health and Safety Program Coordinator (or designated party) will review and approve the chemical properties of all substances prior to purchase.

- **Any request submitted to the Employer for purchase of a chemical or biological substance must include a request for a Safety Data Sheet (SDS).**

ii. It is the responsibility of the Safety Coordinator (or designated party) to review the proposed substance's SDS to ensure proper labeling, handling and protective equipment requirements, as well as proper disposal measures can be met.

iii. Once a product has received initial approval, it will not be necessary to obtain future approval unless the chemical properties of the substance or its storage location have been changed, or if unusual quantities are being considered for purchase.

b) Any PPE required for safe use will be arranged for and purchased by ROSSCLAIR. Prior to the equipment, machinery and / or material being implemented into the work process, the worker will be trained by the Supervisor (or designated party) on the proper use, care and wearing of the PPE.

c) The supplier (or designated party) will also provide training, as required, to workers on safe operating procedures, work practices and hazards associated with the new equipment, machinery and / or material prior to its implementation or trial period.

IV. Distribution

a) A copy of this procedure is available in the Site Safety Plan.

V. Reference Documents

N/A

4.7 MSD Prevention

I. Purpose

To create awareness of musculoskeletal disorders (MSD) and their associated hazards, and begin to address potential MSD hazards through recognition, assessment, and control activities.

II. Responsibilities

a) Senior Management shall ensure that:

- This procedure is implemented and adhered to at all workplaces.
- The resources and training have been provided to personnel to do the work safely.
- Develop/revise appropriate procedures to ensure an integrated ergonomics approach within the workplace, including workplace inspections, injury/discomfort reporting, and accident investigation.
- Review all workplace inspections reports and inform the JHSC of any MSD related items that the supervisor did not address and recommendations for action on those items.
- Ensure compliance with this standard.
- Provide the equipment, resources and training needed to comply with this standard.
- Provide MSD hazard recognition training to all employees.
- Ensure supervisors know how to recognize MSD hazards and know what to do if a worker reports a concern.
- Take every reasonable precaution for protection of all employees

b) Project Manager and Site Supervisors shall:

- Ensure employees are aware of MSD hazards in their job and warning signs.
- Ensure employees practice proper lifting techniques and use equipment and protective devices as appropriate
- Ensure employees take breaks from repetitive, forceful tasks.
- Ensure employee's workstation is adjusted to suit them and the work that they do.
- Encourage employees to report signs and symptoms of MSD.
- Respond promptly to reports of signs and symptoms of MSD.
- Ensure employees are trained on general MSD awareness in orientation.
- Provide job specific safe work practices training

c) Joint Health and Safety Committee and Health and Safety Representatives shall:

- Actively look for MSD hazards during activities such as workplace inspections and accident/incident investigations.
- Participate in an annual review of this standard.

- Review reports and recommendations relevant to MSD hazard recognition, assessment and control, including; inspection, accident/incident investigation, and assessment reports.
- Review MSD injury data and make recommendations accordingly

4.8 Welding and Hot Work Permits

I. Purpose

- a) To provide a guideline for Supervisors to follow when Subcontractors/Contractors perform hot work and welding on behalf of ROSSCLAIR.
- b) To ensure proper care is taken to ensure that welding and cutting is scheduled to avoid fire or explosion.
- c) To ensure only qualified personnel perform welding and hot work activities.

II. Responsibilities

- a) Senior Management shall ensure that:
 - This procedure is implemented and adhered to at all workplaces.
 - The resources and training have been provided to personnel to do the work safely
- b) Project Managers and Site Supervisors are responsible for:
 - Ensure welding and hot work activities are identified by the Subcontractor at the scope of work stage and that the Subcontractor provides the job hazard assessment and detailed list of controls to be applied.
 - Scheduling work to minimize workers exposure to the hazards associated with welding and hot work.
 - Inspecting the work area prior to the commencement of hot work to ensure all precautions have been taken to prevent a fire.
 - Issuing the hot work permit to the appropriate subcontractor/contractor.
- c) Workers shall notify their supervisor immediately of any hot work happening in the workplace that does not have a permit ticket.

III. Procedure

- a) Before any welding or cutting is performed, the Subcontractor shall request the approval via a Hot Work Permit.
- b) Prior to issuing the permit the supervisor shall ensure that the area is clear of any flammable materials, at least 20 ft. (6m) away from the work area, and that a working fire extinguisher is available.

Worker Protection

- c) A proper welding helmet or hand shield with the appropriate tinted glass must be used to avoid eyestrain or arc flash. The welder is cautioned to never look at the arc without protective eye equipment.
- d) To prevent burns to the body, proper clothing is required. Long sleeved heavy cotton

shirts with the neck buttoned up are recommended. Pants should be long enough to cover the tops of the work boots to avoid painful burns to the feet. Avoid wearing thin fabrics containing polyester or nylon due to the high flammability. Work boots should be high cut and completely laced to avoid a weld from entering the boot and causing a severe burn.

- e) Approved leather gauntlets and apron are recommended when using or handling welding equipment.
- f) Welding should be done only in a well-ventilated work area. Properly maintained local exhaust ventilation is recommended to effectively remove welding by-products. The local ventilation should be situated close to the actual weld so that fumes and gases do not pass by the worker's breathing zone prior to removal.
- g) The welding operation should be enclosed using approved shields to protect other workers from flashes and burns.

Safety Rules

- h) The work area must be thoroughly inspected for explosives, oil or any other combustible material prior to commencing welding or burning. Such material must be removed or made safe prior to the operation commencing.
- i) When required to use welding equipment that is already assembled, the worker must complete a pre-start-up inspection to include the following:
 - Check the fitting for tightness
 - Visually check the hose
 - Inspect the torch and tip
 - Check the pressures
 - Check the torch to see if safety valves are in place and properly connected
 - Report any defective equipment immediately and send it out for repair
- j) Proper care of compressed gas cylinders is essential to ensure the safety of the workers and the workplace.
 - When in use, secure all cylinders in an upright position
 - Always open cylinder valves slowly to prevent a sudden surge of pressure. Don't use a hammer or metal object to loosen stuck valves
 - Always stand behind or to one side of the cylinder when opening a valve to protect against a defective valve
 - When equipment is not in use, shut the cylinder valves off
 - Store compressed gas cylinders in a cool location away from heat sources or flammables.
 - For safe storage, keep oxygen and acetylene cylinders separate
 - Keep oxygen cylinders free from oil and grease, contact with valves or regulators will result in an explosion

4.9 Non-Routine Work

I. Purpose

To have a program in place to ensure hazards are properly identified and controls implemented prior to performing non-routine work.

II. Responsibilities

- a) Senior Management shall ensure that:
 - This procedure is implemented and adhered to at all workplaces.
 - The resources and training have been provided to personnel to do the work safely
- b) Project Managers and Site Supervisors are responsible for:
 - Ensuring that workers are acquainted with the hazards in the workplace.
 - Provide job specific safe work practices training
- c) Workers are responsible for:
 - Reporting any unsafe acts, hazards, equipment problems, or any other unsafe tasks immediately to their supervisors.
 - Using equipment, materials, and machinery only as authorized.
 - Participate and have input on any issues or concerns during the pre-meeting.

III. Procedure

- a) On those occasions that non-routine work is performed the Site Supervisor will perform a pre-meeting to discuss the following elements:
 - Task or job to be performed.
 - Any work protection requirements.
 - Requirements for personal protective equipment.
 - Documentation of pre-meeting and those in attendance.
- b) On occasion a task may arise that is performed infrequently. When this occurs it is required that a pre-meeting takes place to discuss the steps that must be taken for the protection of the worker.

IV. Distribution

- a) A copy of this procedure is available in the Site Safety Plan.
- b) A copy of this procedure will be available in the Subcontractor/Contractor Safety Agreement.

V. Reference Documents

- Record of Pre-Meeting for Non-Routine Work

4.10 Workplace Hazardous Materials Information System (WHMIS)

I. Purpose

To ensure workers are properly educated on and practicing adequate care in the usage, handling and disposal of chemical and biological agents in their work areas.

II. Responsibilities

- a) Senior Management shall ensure that:
 - This procedure is implemented and adhered to at all workplaces.
 - A current/valid Safety Data Sheets (SDS) is available for all WHMIS controlled products used in our projects or at head office.
 - The resources and training have been provided to personnel to do the work safely
- b) Project Managers and Site Supervisors are responsible for:
 - Ensuring that workers are acquainted with the hazards in the workplace.
 - Provide job specific safe work practices training
 - Containers containing product are properly labelled to identify their contents.
 - Controlled products are not used unless accompanied by approved labels and SDS.
- c) Workers are responsible for:
 - Reporting any unsafe acts, hazards, equipment problems, or any other unsafe tasks immediately to their supervisors.
 - Using equipment, materials, and machinery only as authorized.

III. Procedure

- a) The Joint Health and Safety Committee will conduct an inventory identifying all the different types of chemicals used and in what quantities.
- b) Regular planned inspections and unplanned observations will verify that containers are properly labeled.
- c) Following the inventory, the Joint Health and Safety Committee will verify that Safety Data Sheets are available for all WHMIS controlled products being stored or used during ROSSCLAIR activities.
 - The SDS are scanned and maintained electronically where they are accessible to all ROSSCLAIR employees.
 - The SDS must be maintained and to ensure that they are current.
- d) All workers require WHMIS training annually.
 - The training must include the generic component of recognizing WHMIS symbols, reading SDS and the hazards associated with the different classes of compounds.
 - Any employee working with a controlled substance must also have workplace specific

training that addresses the controls in place to protect the worker from the hazards associated with the chemical.

- All new employees will receive WHMIS training within their first week of employment, prior to using a controlled product.
- e) The WHMIS training program is reviewed annually by the JHSC. Any discrepancies or shortcomings identified will be identified along with potential recommendations for improvement. The review will be documented in the minutes of the JHSC.
- f) Any alternative WHMIS training proposed by management must be presented to the JHSC for input.
- g) The chemical inventory and SDS will be managed in a supplementary document in our SDS logbook.

IV. Distribution

- d) Copies of Safety Data Sheets are readily available to all workers.
- e) Copies of this procedure is available in the ROSSCLAIR Health and Safety Manual.

V. Reference Documents

- SDS Logbook
- Chemical Inventory
- Guideline to WHMIS

Element 5 Company Health & Safety Rules

5.1 Company Health and Safety Rules

I. Purpose

- a) It is the policy of ROSSCLAIR that every employee is entitled to a safe and healthy place in which to work. Our Safety Program expresses the will of management and employees to eliminate occupational injuries.
- b) Documented health and safety rules are intended to establish and communicate expectations around personal conduct and are designed to protect the health and safety of all individuals.
- c) These documented rules apply to all workers while on company property, job sites and while conducting business on behalf of ROSSCLAIR.
- d) The following Rules and Regulations are designed for the protection of all employees to prevent accidents and injuries. These rules are by no means complete nor intended to cover all situations. Common sense and safe working habits are the best accident prevention measures.

II. Responsibilities

- a) Senior Management will:
 - Establish and maintain clear and concise rules to help protect the health and safety of any individual who may be impacted by ROSSCLAIR or the performance of their work.
 - Develop a progressive disciplinary program to correct inappropriate behaviour.
 - Communicate current health and safety rules by posting in conspicuous locations and making readily available to all subcontractors and suppliers upon request.
 - Ensure all workers are trained on these rules and that new hires are made aware of and trained during their orientation.
 - Hold all managers and supervisors accountable for enforcing the rules consistently.
 - Review the rules annually for adequacy.
- b) Project Managers and Supervisors shall:
 - Train all workers to perform work in a manner which is safe and compliant with the established health and safety rules.
 - Follow and ensure all workers under their direction are aware of and adhere to all established health and safety rules.
- c) Workers will:
 - Have an awareness, understanding, and acknowledge the ROSSCLAIR's Health and Safety Rules.
 - Comply with the ROSSCLAIR's health and safety rules and encourage the safe behaviour of fellow workers.

III. Procedure

- a) Health and safety rules are established based upon the risk assessment, legislated requirements, safe work practices, manufacturer's guidelines and industry standards and company policy.
- b) An employee may be disciplined for breaking any of, but not limited to, the ROSSCLAIR Health and Safety Rules and Regulations. This disciplinary action may range from reprimand to termination depending upon the nature of the offense, circumstances surrounding the case, and overall record of the employee. Please refer to section 1.4 Performance Evaluation and Progressive Discipline Process for more information.
- c) A Site Supervisor or Project Manager must notify Senior Management when they are going to utilize progressive discipline when a worker or Subcontractor/Contractor is in violation of these rules and the taken corrective action to stop the inappropriate behaviour and prevent a dangerous situation from occurring.

IV. Distribution

- a) The health and safety rules will be stored in a location that is readily accessible to all employees.
- b) A copy of the Company Health and Safety Rules will be posted on the H&S bulletin board(s).
- c) The health and safety rules will be made available to subcontractors and suppliers upon request.

V. Reference Documents

- ROSSCLAIR Health and Safety Rules

5.2 Employee Code of Conduct

I. Purpose

All employees have certain responsibilities both to ROSSCLAIR and fellow workers. These relate to personal behavior, appearance, leaving company premises during working hours, using company mail service, telephones and other equipment, processing or consuming illegal drugs or alcoholic beverages, and carrying weapons.

II. Responsibilities

- a) Senior Management shall ensure that:
 - This procedure is implemented and adhered to at all ROSSCLAIR workplaces.
 - The resources and training have been provided to personnel to do the work safely.
 - This document is periodically reviewed for adequacy.
- b) All ROSSCLAIR personnel shall conduct all company transactions in an ethical and lawful manner.

III. Procedure

- a) ROSSCLAIR employees must conduct all company transactions in an ethical and lawful manner while recognizing their responsibility to represent the best interests of ROSSCLAIR.
- b) The conditions listed here are only examples of the kind of misconduct warranting corrective action, up to and including termination.
- c) In most situations, use of common sense and good judgment will ensure satisfactory conduct. If you are ever in doubt, speak with your Manager or Supervisor.
- d) Employees are expected to behave in ways that positively reflect ROSSCLAIR's core values. For example, fighting, horseplay or disorderly activities including threatening or abuse, destruction, neglect, defacing, damaging or theft of property of ROSSCLAIR or its employees are not acceptable.
- e) More specific codes of conduct regarding employee expectations and performance will be detailed in the Employee Handbook and Trainer's Manual.

IV. Distribution

This procedure will be communicated and distributed to all our subcontractors/contractors and employees upon request and as part of:

- Employee Orientation
- Subcontractor/Contractor Safety Package
- Posted on all Health & Safety Communication Boards, office and at projects sites
- Safety Talks or Toolbox Talks
- Payroll mail out.

5.3 Subcontractors/Contractors

I. Purpose

ROSSCLAIR recognizes that it makes good business sense to direct and promote the safety of contractors, subcontractors and their workers. By assuming a leadership role, our company will minimize unnecessary risk and costs associated with preventable injuries/accidents and litigation proceedings. ROSSCLAIR is committed to preventing occupational injuries and illnesses and providing a safe work environment and part of this commitment includes:

- a) Working only with companies with a proven health and safety record.
- b) Taking every reasonable precaution to protect the safety of our contractors/subcontractors for the duration of their contract.
- c) Establishing minimum guidelines for Subcontractors/Contractors to help provide and maintain a safe work environment for all employees.

II. Responsibilities

- a) Senior Management shall ensure that:
 - This procedure is implemented and adhered to at all ROSSCLAIR workplaces.
 - The resources and training have been provided to personnel to do the work safely.
 - This document is periodically reviewed for adequacy
- b) The Project Manager and Site Supervisor are responsible for:
 - Communicating and obtaining documentation from Subcontractor/Contractor
 - Monitoring the Subcontractor/Contractor while they are performing work on behalf of ROSSCLAIR and where necessary, issuing infraction notices when the Subcontractor/Contractor is not complying with company policy or regulatory requirements.
 - Maintaining completed Subcontractor/Contractor Safety Agreements, Safety Infraction notices, provided records of training for Subcontractor/Contractor personnel at the jobsite and forwarding a copy to Health and Safety Program Coordinator.
- c) The Subcontractor/Contractor is responsible for complying with all applicable ROSSCLAIR policies and procedures for the duration of time they are providing services or work either for or on behalf of ROSSCLAIR.

III. Procedure

- a) The Project Manager is responsible for providing initially approved Subcontractors/Contractors with a copy of the Subcontractor/Contractor Safety Agreement.

- b) The Subcontractors/Contractors reviews the form, signs and returns to the Project Coordinator/Site Supervisor along with copies of:
- Liability insurance
 - WSIB clearance certificate
 - A copy of the job hazard and risk assessment (JHRA) associated with the proposed work.
 - All the training records for their workers to be onsite at the ROSSCLAIR project.
- c) The Subcontractor/Contractor Safety Agreement must be resigned annually.
- Note: Delivery persons are excluded from this requirement provided they perform no other service outside of delivery activities.
- d) The Project Manager and or the Site Supervisor will conduct a pre-meeting and provide the Subcontractors/Contractors workers with an orientation prior to the commencement of work. The orientation will cover, at minimum:
- Authorized areas
 - ROSSCLAIR Company Health and Safety Rules, Safe Work Practices and Procedures.
 - ROSSCLAIR Emergency Response Plan and the importance of the Sign-in/Out sheet
 - JHRA introduced by other Contractors/Subcontractors during the project, if applicable
 - Contractor/Subcontractor Monitoring and Discipline
 - Hazard and Incident Reporting
- e) All employees, including contractors/subcontractors are equally responsible for complying with the requirements of the OHSA and its Regulations.
- f) The completed Subcontractor/Contractor Safety Agreement, WSIB clearance, proof of insurance, training records, JHRA and orientation sign off are kept in the Subcontractor/Contractor file at the project site.
- g) Records of Subcontractors/Contractors Safety Infractions are kept in the Subcontractors/Contractors file. These infractions will be reviewed and taken into consideration when qualifying the Subcontractors/Contractors for any subsequent projects

IV. Distribution

- a) A copy of this document will be available in the Site Health and Safety Plan.

V. Reference Material

- Subcontractor/Contractor Safety Agreement

5.3b Subcontractor/Contractor Disciplinary Measures

I. Purpose

ROSSCLAIR is aware that it may be necessary from time to time to have Subcontractors/Contractors perform work on the premises. To ensure that the standards are being met, the Management has a responsibility to communicate performance expectations with the Subcontractors/Contractors, and to ensure that the consequences of non-compliance are understood.

II. Responsibilities

- a) Senior Management shall ensure that:
 - This procedure is implemented and adhered to at all ROSSCLAIR workplaces.
 - The resources and training have been provided to personnel to do the work safely.
 - This document is periodically reviewed for adequacy.
- b) The Site Supervisor is responsible for:
 - Periodically observing Subcontractors/Contractors performing work at jobsites to ensure work is complying with regulatory and ROSSCLAIR health and safety requirements.
 - Correcting unsafe behaviours and or conditions created by the Subcontractors/Contractors and initiate the following discipline process.

III. Procedure

- a) The ROSSCLAIR Site Super will periodically monitor the activities and behaviours of the Subcontractors/Contractors. If workers are observed to be not following the OHS, Regulations or ROSSCLAIR Company Health and Safety Rules, the Site Super shall stop and correct the unsafe behaviours and or conditions created by the Subcontractors/Contractors and initiate the following discipline process:

1. Verbal Warning

When a Supervisor identifies a Subcontractors/Contractors as not complying with a safe work practice, procedure or safety rule, the Supervisor will initiate a verbal discussion with the Subcontractors/Contractors. It is important to ensure that the Contractor understands ROSSCLAIR's standards and is properly informed of continued substandard performance.

2. Written Warning

If the Supervisor observes the Subcontractors/Contractor's continued failure to comply, a written warning will be issued. The written warning will explain the reason for further disciplinary action and will advise the contracting Company that continued failure to comply would result in a more severe action.

3. Supervisors on Work Site

Following the written warning, continued non-compliance of the Subcontractors/Contractors will result in a letter informing the contracting Company of the requirement for a Supervisor's presence on the work site. After this point, the contracting Supervisor will be held accountable for any substandard performance of the Worker under his / her responsibility.

4. Discharge from Company premises

If the Subcontractor /Contractor's Supervisor is not performing their duties, ROSSCLAIR's Management will inform the contracting Company of the need to discipline their workers. Payment will be held until the Company provides adequate proof that the rules and regulations of ROSSCLAIR will be followed.

b) Record Keeping - Accurate records of disciplinary measures taken against Subcontractor/Contractor's Health and Safety infractions will be maintained by Management in the contracting Company's files, with a copy sent to the contracting Company. Written documentation will include the following information:

- Name of Subcontractor/Contractor
- Date and time of infraction
- Type of infraction
- Number of previous warnings issued to Subcontractor/Contractor
- Action taken by Management
- Name of person initiating the action
- General comments

IV. Distribution

This procedure will be communicated and distributed to all our subcontractors and employees upon request and:

- Subcontractor/Contractor Safety Package
- Posted on all project site Health & Safety Communication Boards

V. Reference Documents

- Subcontractor/Contractor Infraction Form

5.4 Visitor Health and Safety Policy

I. Purpose

- a) At ROSSCLAIR we are committed to promoting and providing a safe and healthy work environment and the prevention of occupational illness and injury to persons visiting our workplace and job sites.
- b) To establish a guideline for visitors on the measures to be taken to protect their health and safety while on our job sites. The consequences of failing to comply with ROSSCLAIR's safety rules and/or legislative requirements may include immediate removal from the premises or jobsite. We appreciate your cooperation.

II. Responsibilities

- a) Senior Management shall ensure that:
 - This procedure is implemented and adhered to at all ROSSCLAIR workplaces.
 - The resources and training have been provided to personnel to do the work safely.
 - This document is periodically reviewed for adequacy
- b) The ROSSCLAIR employee contact is responsible for Visitors for the duration of time they are on ROSSCLAIR job sites or workplaces. Visitors may not be left unescorted

III. Definition

Visitor is defined as any person who is not an employee or approved subcontractor/contractor of ROSSCLAIR

IV. Procedure

- a) Visitors must enter the Head Office through the front doors only and sign the Visitors Log upon arrival.
- b) Visitors must not go to project sites without explicit consent and knowledge of the Site Super before hand. Visitors must wait outside the project until they are greeted and escorted by the Site Super or designate.
- c) All visitors are required to abide by the safety rules and wear any PPE as directed by ROSSCLAIR, and as dictated by the circumstances and workplace areas.
- d) Visitors must follow the instructions of their escort and abide by ROSSCLAIR's safety policies, procedures and standards, including the Emergency Plan.
- e) Visitors must remain only in areas where access is specifically permitted and must immediately report any unusual occurrences or conditions to their escort.
- f) Visitors are not allowed to bring any foreign object into the office or to any jobsite without prior authorization from ROSSCLAIR.
- g) Visitors must ensure that their presence does not create a hazard for our employees; this includes maintaining a high standard of housekeeping.

V. Distribution

- a) The ROSSCLAIR contact will provide a copy of this policy to visitors intended to enter a ROSSCLAIR jobsite.
- b) A copy of this policy will be made available at the front desk of ROSSCLAIR head office.

VI. Reference Document

- Visitor & Subcontractor Sign-in Log

Element 6 Personal Protective Equipment

6.1 Personal Protective Equipment Policy

I. Purpose

- a) To determine and outline the personal equipment to be utilized to assist in mitigating risk because of the Hazard Assessment Process.
- b) The program will provide direction for the need, selection, care, and use of personal protective equipment. Personal Protective Equipment is an essential component of risk hazard control to mitigate the risk of injury.

II. Responsibilities

- a) Senior Management are responsible for:
 - Ensuring this procedure is implemented and adhered to.
 - Periodically reviewing this procedure for adequacy.
 - Providing guidelines based on project site requirements as determined by hazard recognition
 - Purchasing and maintain equipment as required.
 - Ensuring workers have an area for storage for PPE, direction on how to use equipment
 - Ensuring contractors/subcontractors are provided with information on PPE expectations
 - Arranging for training related to specialized PPE for worker's and maintain training records
- b) Project Manager and Site Supervisor are responsible for:
 - Using information from hazard recognition process and/or job hazard assessments to review and assign PPE for specific job tasks based
 - Monitoring and enforcing the use of PPE in their areas/jobsites
 - Ensuring adequate training is provided to the workers on the safe usage, selection and care of PPE.
- c) Workers are responsible for:
 - Being aware of, understanding and acknowledging the ROSSCLAIR PPE requirements, storage and use.
 - Maintaining applicable Records of Training for specialized PPE (i.e. half-mask)
 - Performing required inspection of PPE, record where and when required on equipment.

III. Procedure

- a) This program will apply to all ROSSCLAIR employees and contractors in the performance of work, where appropriate.
- b) Program Components
 - Selection - which protective equipment to use and when.
 - Use - the correct use of the equipment.
 - Maintenance - the proper maintenance of the equipment.
 - Storage - the safe way to store protective equipment.
 - Replacement - how and when to replace the protective equipment.
- c) Types of Personal Protective Equipment:

1. *Protective Footwear*

- Protective footwear shall be fully laced and tied in compliance with manufacturer's specifications.
- Employees, contractors/subcontractors, and visitors shall clean, store, and maintain their footwear in compliance with manufacturer's specification.
- Employees, subcontractors, and visitors shall inspect their protective footwear each day, prior to first use, to ensure it will provide the intended level of protection.

Use

- All employees, contractors/subcontractors, and visitors shall always wear a CSA approved Grade 1 protective footwear (signified by the green patch) while on jobsites
 - ✓ All employees, subcontractors, and visitors shall supply their own protective footwear

Selection

- Must be CSA approved Grade 1 protective footwear (signified by the green patch), Z195-92 Protective Footwear
- Ensure they fit properly (Should fit snug when laced up with ample toe room)

Maintenance

- For specific maintenance follow manufacturers' specifications.
- Inspect footwear after every shift for damage.
- Ensure laces are kept clean and in good condition.

Storage

- Keep in a clean and dry area.

- Do not share safety footwear if specifically fitted for personal use.

Replacement

- Replace if worn out and/or damaged.
- Replace footwear if the sole becomes detached **or worn**.

2. High Visibility Clothing

- High Visibility Clothing must be worn in work areas where vehicular traffic is present.
- Additional requirements for high visibility clothing shall be identified through Hazard Recognition and documented on Safe Job Procedures, and/or Job Hazard Assessments.
- High visibility clothing shall be worn in compliance with manufacturer's specifications.
- Employees, subcontractors, and visitors shall clean, store, and maintain their high visibility clothing in compliance with manufacturer's specification. Worn or faded vests shall be replaced.

3. Safety Gloves

- Suitable CSA approved protective gloves shall be worn where the risk of hand injury exists.
 - ✓ ROSSCLAIR will provide appropriate protective gloves.
- Requirement for specific protective gloves shall be identified through Hazard Analysis and documented on Safe Job Procedures, Job Hazard Assessments.
- Protective gloves shall be worn in compliance with manufacturer's specifications.
- The cleaning, storage and maintenance of protective gloves shall follow manufacturer's specification.
- Employees, subcontractors, and visitors shall inspect their protective gloves each day, prior to first use, to ensure it will provide the intended level of protection.

Use

- Shall be worn by employee when there is the potential risk of hand injury or risk of exposure to hands from chemicals or handling used equipment.

Selection

- Gloves are to be selected based potential hazard.
 - ✓ Refer to SDS for chemical exposure
 - ✓ Manufacturer's guide for cut, heat resistance etc.
- Ensure your gloves fit properly

Maintenance

- Will vary based on glove type. Follow the manufacturer's guideline.
- Some gloves will be disposed of after use further direction will be provided based on specific tasks

Storage

- Keep in a clean, dry location away from direct sunlight.
- Additional requirements may exist based on manufacturer's recommendations. Other gloves specific to identified task and direction

Replacement

- Replace if there are any rips, tears in the glove

4. *Hearing Protection*

- Requirement for hearing protection shall be identified through Hazard Analysis and documented on Safe Job Procedures, and or Job Hazard Assessments.
 - ✓ ROSSCLAIR will provide employees with appropriate hearing protection.
 - ✓ contractors/subcontractors and visitors will be responsible for obtaining and wearing appropriate eye protection when required on ROSSCLAIR jobsites
- Hearing protection shall be worn in compliance with manufacturer's specifications.
- Employees, subcontractors, and visitors shall clean, store, and maintain their hearing protection in compliance with manufacturer's specification.
- Employees, subcontractors, and visitors shall inspect their hearing protection each day, prior to first use, to ensure it will provide the intended level of protection.

Use

- Hearing protection must be used in areas noise levels meet or exceed 85dbA.
- Double hearing protection is required in areas where noise levels meet or exceed 100dbA.

Selection

- Hearing protection shall consist of ear plugs or ear muffs with a Noise Reduction Rating (NRR) of 25 or more.
- Double hearing protection shall consist of both ear plugs and ear muffs with an NRR rating of 25 or more.
- Ensure proper fit

Maintenance

- Will vary based on hearing protection type

Storage

- Keep stored according to the manufacturer instructions

Replacement

- Replacement in accordance with the manufacturer guidelines

5. *Safety Glasses and/or Face Shield*

- Requirements for specific protective eyewear shall be identified through Hazard Recognition Process, and documented on Safe Job Procedures, and/or Job Hazard Assessments.
 - ✓ ROSSCLAIR will provide appropriate eye protection to employees; however, contractors/subcontractors and visitors will be responsible for obtaining and wearing appropriate eye protection when required on ROSSCLAIR jobsites.
- Protective eyewear shall be worn in compliance with manufacturer's specifications.
- All employees shall clean, store, and maintain their eyewear in compliance with manufacturer's specification.
- Employees shall inspect their protective eyewear each day, prior to first use, to ensure it will provide the intended level of protection.

Selection

- Must be certified by the Canadian Standards Association (CSA)
- Ensure your safety glasses fit properly
- Eye size, bridge size and temple length may vary.
- Temples should be comfortable over the ears. The frame should be as close to the face as possible and the bridge should rest on your nose. It

should not be or feel too tight.

Use

- Shall be worn by employee where there is the potential risk of eye injury
- Shall be worn by employees while welding, cutting, grinding, while working under vehicles and/or where flying particles are commonly encountered.

Maintenance

- Clean glasses after each use.
- Wash in soapy water and dry with a damp non-abrasive cloth.

Storage

- Store in a safe place where lenses are protected from scratching.
- Scratches may impair vision and can weaken the lenses, do not use if scratched.
- Do not store in direct sunlight.

Replacement

- Replace if there are any cracks or scratches on the lenses, arms or frame.
- If you are replacing a part, replace only with identical parts from the same manufacturer.

6. *Respiratory Protection*

- Respiratory hazards are controlled using ventilation. Respiratory protection is required when ventilation is not practical and when workers are potentially exposed to airborne contaminants.
- Types of respirators that will be used on site are as follows:
 - ✓ Paper dust mask
 - ✓ North/3m Full or Half mask;
 - ✓ If applicable; SCBA or SABA - for oxygen deficient atmospheres or toxic atmospheres, based on hazard assessment or SDS.
- Prior to using any respirator on site, employees will be adequately trained on the selection, use and care of respiratory protective equipment and fit test must be completed by competent personnel. Adequate training will be required.
- Annual review of Procedure to identify any changes to the ROSSCLAIR Health and Safety Program; Revision Page will reflect the review and update

Selection

- Must be provided by Employer
- NIOSH approved
- Fit Testing for employees to be administered by Employer
- There are several forms available:
 - ✓ Mouth respirator (covers only the mouth)
 - ✓ Quarter-mask (covers just the nose and mouth)
 - ✓ Half-face (covers the face from nose to chin)
 - ✓ Full-face piece (covers face from above the eyes to below the chin)

Use

- Must be worn when sanding, spraying, grinding
- When using certain aerosols, glues, cleaners
- Painting in paint shop and/or in the wash bay
- In dusty environments
- Must refer to SDS for all chemicals which will identify applicable PPE and respiratory requirements

Maintenance

- Differs depending on make and model
- Follow manufactures guidelines
- Must be kept clean
- Never use solvents to clean respirators
- Rinse with clean water and allow to air dry
- Record all repairs and/or inspections to any equipment

Storage

- Always keep in a plastic sealed bag to ensure kept clean
- Keep stored at room temperature

Replacement

- As per manufactures guidelines
- Ensure there are no holes, tears, cracks or scratches
- All pieces must fit snug without being rippled or distorted
- See supervisor if need replacement

7. Hot Work Protective Clothing

- ❑ All workers engaged in welding operations must wear:
 - ✓ Flame – retardant work clothing including:
 - ✓ Fire resistant gauntlet gloves
 - ✓ Apron or leggings
 - ✓ Cape or shoulder cover if welding overhead
 - ✓ Fire resistant helmet
 - ✓ Contact lenses should not be worn
 - ✓ All face shields and protective equipment are to meet CSA safety standards
- d) All new employees will receive training and awareness orientation on the personal protective requirements through the new hire orientation process.
- e) Refresher training will be provided annually and specific training on PPE will be provided as per regulatory and manufacturer’s guidelines.
- f) The Personal Protection Equipment Policy will be reviewed on annual basis to ensure it continues to meet current regulations and standards and to ensure it is relevant with current operations.
- g) The Policy will also be evaluated throughout the year review by analyzing site safety reports, incident reports, accident investigations, safety meetings and JHSC minutes.

IV. Distribution

- a) The Personal Protection Equipment Policy will be available in the Health and Safety Program Manual and periodically communicated via:
 - Safety talks
 - Email
 - Payroll email out
 - Subcontractor/Contractor Safety Agreement

V. Referenced Documents

N/A

Element 7 Preventive Maintenance Policy

7.1 Preventive Maintenance Policy

I. Purpose

- a) Providing a guideline for the preventative maintenance of both owned and leased equipment utilized by ROSSCLAIR.
- b) Ensure training provided to workers when related to operation of equipment.

II. Responsibilities

- a) Senior Management shall ensure:
 - Equipment is purchased and maintained as required, based on manufacturer's guidelines as a minimum.
 - That the equipment list requiring preventive maintenance (both rented and owned) is established.
 - Guidelines are provided based on jobsite requirements, as determined by JHA.
 - Subcontractors/Contractors follow and have required equipment and awareness of equipment over 10-HP on the project site.
 - Annual inspection of equipment over 10-HP with records.
 - Where rental equipment is provided, awareness of maintenance or service agreement
 - Technician or mechanic credentials who are performing maintenance are available and maintained on file.
 - Work orders for repairs/maintenance performed by external contractors outline the repairs/maintenance performed and a copy of this is filed with head office.
- b) Project Managers and Site Supervisors shall ensure:
 - Workers have an area for storing equipment, awareness of operation and completion of equipment circle checks when required.
 - Awareness, understanding and acknowledge the preventative maintenance requirements of the equipment being utilized at the job site.
 - Training or instruction is provided to workers on the equipment they are to use.
 - Daily or pre-use inspections of equipment are performed, and recorded Operator Equipment Maintenance Inspection Checklist.
 - Operator checklists are reviewed and that work orders are created for any reported deficiencies.
 - Any faulty equipment is immediately tagged out of use and corrective action

is taken to repair equipment or have it removed from the jobsite.

- c) Workers are responsible for:
- Having awareness, understanding and acknowledge the preventative maintenance requirements of the equipment they are to use.
 - Participating in training or instruction on new or unfamiliar equipment by Supervisor or designate.
 - Notifying their Supervisor if they are not familiar with any aspect of operating the equipment.
 - Performing daily or pre-use inspection of their equipment, and documenting inspection onto the Operator Equipment Maintenance Inspection Checklist.

III. Procedure

- a) All equipment requires an Operator Equipment Maintenance Inspection Checklist or similar checklist that identifies at least the following:
1. Date of Inspection
 2. Odometer/Hour Reading
 3. Area(s) Inspected
 4. Noted any defects during inspection
- b) All equipment not in operational condition will be identified in writing and reported to a Supervisor for alerting and arrangements for corrective action.
- c) All repairs and service work will be documented and file available at head office for a period as required. Ensure that all repairs and maintenance that has been contracted to third parties provide a copy of the work done. This copy should be filed with head office.
- d) Maintenance Schedules All equipment requiring regular maintenance will be listed in the Preventative Maintenance Chart.
- A monthly review is performed to ensure accountability for equipment and maintenance by the Site Super.
 - An annual review will be conducted to verify the required preventative maintenance has been conducted.
- e) Operator Equipment Maintenance Inspection Checklist: to be completed by the Operator on daily use of equipment, or pre-use if equipment is not utilized regularly, and recorded
- “Checkmark” (✓) to be used for good condition
 - “Strike” (✕) to be used for defective condition
 - Not completed () “blank” for not applicable
 - Use of a line for the day if not operated on the day

- f) Inspection of tools/equipment will be by competent personnel whose trade or experience has given them knowledge of the tool or equipment being inspected. Inspection criteria and documents are contained in the section of this manual that covers the specific tool or equipment. The equipment that will be inspected applies to:
1. Fall Protection equipment such as harnesses, lanyards, lifelines, horizontal cable lines, respirators, and rope grabs
 2. Rigging such as slings, hooks, shackles, come-along and chain falls
 3. Ladders
 4. Electrical equipment such as cords, electrical tools and GFCI's
- g) Defective tools/equipment requiring repairs shall be tagged with a red tag, if the tool is not taken off the site immediately for repairs. The operator will record the defects or required repairs on the red tag or similar.
- Tools/equipment that cannot be repaired to perform in the intended manner shall be removed from the project
- h) Maintenance of Vehicles/Equipment such as trucks, forklifts, personnel hoists, cranes, etc. will be maintained and repaired in accordance with the manufacturers specifications, or if required those of a professional engineer. Senior Management or designate shall establish a schedule and maintain documentation to ensure compliance.
- An equipment list has been established and will be maintained annually.
 - All mechanically-powered vehicles, machines, tools and equipment rated at greater than 10 horsepower shall be inspected by a competent worker to determine whether they can handle their rated capacity and to identify any defects or hazardous conditions.
 - The inspections shall be performed before the vehicles, machines, tools or equipment are first used at the project and thereafter at least once a year or more frequently as recommended by the manufacturer.
- i) Annual review of this procedure and the equipment inventory list will be completed to identify any changes to the ROSSCLAIR health and safety program.
- j) Completed pre-use, pre-operational checklists will be submitted weekly to the Site Super, who will then submit to Head Office for record retention

IV. Distribution

The Personal Protection Equipment Policy will be available in the Health and Safety Program Manual and periodically communicated via:

- Safety talks
- Email
- Payroll mailout
- Subcontractor/Contractor Safety Agreement.

V. Reference Document

- Equipment Inventory List
- Operator Equipment Maintenance Inspection Checklist

Element 8 Communication and Training

8.1 Communication and Training Policy

Our Health & Safety Program emphasizes three main components that can have a big impact on the overall Safety Culture and greatly decrease accidents in the workplace. These components are:

- Training: Training and periodic retraining of employees in the safe performance of their duties.
- Competent Supervision: To lead by example and to coach and direct, monitor and enforce workers in the performing work safely.
- Management Commitment: The recognition by management of the importance of a safe workplace and their support in maintaining it.

I. Purpose

- a) To create and maintain a safe workplace to minimize and/or prevent occupational injuries and illnesses. Consistent and continuous efforts by all employees shall be directed to preventing workplace accidents and maintaining the workplace and equipment in a safe condition.
- b) To establish minimum guidelines for providing and maintaining a safe work environment for all employees
- c) To ensure supervisors are competent and able to organize work in safe manner and provide adequate supervision.
- d) To create a Training Matrix that identifies the required competencies for workers based upon job descriptions.
- e) To outline the methods commonly utilized to communicate elements of our Health and Safety Program.

II. Responsibilities

- a) Senior Management is responsible for:
 - Educating and periodically retraining workers on the safe performance of their job
 - Ensuring supervisors receive adequate training and direction
 - Holding Supervisors accountable
 - Reviewing and appointing appropriate resources for safety training needs
 - Annually review this document for adequacy in meeting compliance with applicable regulatory requirements
 - Developing, implementing and maintaining a comprehensive Health and Safety Manual, in consultation with the Joint Health and Safety Committee and Health and Safety Representatives as appropriate.
- b) The Director of Finance & Administration is responsible for providing employees with written proof of their completion of employee and/or supervisor basic

occupational health and safety awareness training, upon request.

- c) Every person who undertakes, or has the authority, to direct how another person does work or performs a task is under a legal duty to take reasonable steps to prevent bodily harm to that person, or any other person, arising from the work or task. In addition, every supervisor is responsible for:
- Applying the ROSSCLAIR training and communication requirements when educating and training workers on the skills required to perform the job and protect the workers from reasonably foreseeable hazards.
 - Completing the supervisor basic occupational health and safety awareness training within one [1] week of becoming or acting as a supervisor, if not exempt under the Regulation.
 - Evaluating the:
 - i. Skill requirements of the job
 - ii. Potential hazards associated with the job
 - iii. Qualifications of the worker
 - Ensuring that:
 - i. All workers receive the orientation and the necessary training to perform their work safely
 - ii. Workers are aware of, understand, and follow the safe procedures, practices and rules associated with job.
 - iii. Training records are maintained and readily available.
 - iv. Safe and healthy work conditions are maintained in their areas of responsibility;
 - v. Employees perform their work in compliance with accepted safe work practices and procedures
 - vi. Adequate additional training is provided to employees so that tasks assigned to employees can be performed safely
 - vii. employees are notified of any potential hazards which may exist in and around the employee's work location
- d) Joint Health and Safety Committee shall:
- Annually verify that the orientation procedures are current and suitable to meeting ROSSCLAIR's needs.
 - Annually analyze records to identify trends and make recommendations for correction as required.
 - Quarterly verify that the orientation activity and record keeping is being completed.
 - Ensure training programs are identified and implemented as required

- e) Contractors and their workers are responsible for meeting or exceeding the requirements of the Site Health and Safety Manual
- f) All workers are responsible for:
 - Participating in all required training provided.
 - Learning about safety in all aspects of the job. Familiarizing themselves with the health and safety management system, applicable operator's manuals and site policies and procedures.
 - Reporting any new hazard to their immediate Supervisor immediately so that the hazard can be corrected, and any operating controls can be reviewed / revised.
 - Participate in the orientation activity as required
 - Working in compliance with the Occupational Health & Safety Act and follow safe work practices and procedures; report any unsafe conditions, always wear applicable PPE.
 - Providing continuous improvement suggestions on training and communication items.
 - Immediately informing supervisor if they cannot comprehend any training materials provided or if they are unsure how to find or perform safe practices and procedures.
 - Keeping copies of all completed training records. Request to be provided with a copy of the training certificate/record upon completion of training.

III. Methodology

The employee orientation program consists of two components:

- a) General Orientation:
 - Provided on the first day of employment by the Manager/Supervisor.
 - Applies to all new employees, both permanent and temporary.
- b) Assignment of A Work Buddy or Mentor:
 - The Supervisor will appoint a co-worker to be the new employee's work buddy or mentor during the first week of employment.
- c) Training is an ongoing component of the health & safety program. As there are regular changes in business processes and operations, there is a similar requirement for training programs to be changed in response to new information and new situations. In addition, to help keep health & safety awareness a priority and included as a part of the workplace culture, it is important to have an ongoing improvement training program that continuously educates the workforce on matters of health and safety.
- d) Training is essential for all new employees and those newly assigned to unfamiliar tasks. Without proper training, employees may unknowingly create risks for themselves or for others through their actions. New workers may also not have the

experience to identify work situations that are hazardous and may continue to put themselves at risk.

- e) Employees new to the company or new to a specific job must receive orientation regarding safe practices and procedures relative to the job they will be performing.
- f) There is a distinct difference between certification and competency. Certification shows a level of education or training received. Competency is defined as having the ability, skill, proficiency, and expertise to perform the task(s) required in a safe, reliable, reproducible manner. Receiving training does not always indicate competency, which must be evaluated separately. These differences must be recognized by the company.
- g) Effective training has five components
 - General Safety Orientation – general and site specific
 - On-the-Job Training
 - Ongoing Training
 - Safety Talks
 - Structured Training sessions

IV. Procedures

- a) Site Supervisors or Direct Supervisor:
 - 1. Develop and implement the orientation activity in consultation with Senior Management and Joint Health and Safety Committee.
 - 2. Conduct general orientation.
 - 3. Ensure that the employees affected by the orientation activity are trained as required.
 - 4. Maintain records of completed orientation.
 - 5. Will meet with new employees on a weekly basis to discuss any concerns and provide guidance. This activity will occur during the first four (4) weeks of employment
 - 6. Arranging for orientation training and entry of employee into company training matrix.
 - 7. Records are kept of employee basic occupational health and safety awareness training completed by employees, either completed at the workplace or completed prior to employment with ROSSCLAIR, if an employee qualifies for an exemption
 - 8. Providing continuous improvement suggestions to Senior Management on training and communication items.
 - 9. In cooperation with the Joint Health and Safety Committee or the Health and Safety Representative, as appropriate, shall ensure that a Site Health and Safety Plan is provided at each job site, that has the following minimum elements:
 - o Accident reporting;

- Accident investigation procedures;
 - Workplace Hazardous Material Information System (WHMIS);
 - Safety orientation and training;
 - Workplace Safety Inspections;
 - First Aid arrangements and procedures;
 - Equipment Lockout procedures;
 - Emergency Spill procedures, if appropriate;
 - Driver licensing program for CVOR, if appropriate;
 - Health and Safety monitoring and reporting procedures; and
 - Other information deemed advisable or necessary by local management and/or the JHSC or HSR, for the protection of employees
10. Jobsite Site Supervisors are required to develop and publish an Emergency Plan which outlines procedures to be followed in the event of an emergency arising from fire, theft, break-in, bomb threats, power failure, or other natural disasters. Employee emergency response training, including fire training and drills, shall be conducted on a regular basis.
- b) At all times, ROSSCLAIR and its employees are required to observe and comply with the requirements of the Ontario *Occupational Health and Safety Act*, the *Workplace Safety and Insurance Act* and their regulations.
- c) Every employee and every supervisor are required to complete the appropriate basic occupational health and safety awareness training program as specified in Ontario Regulation 297/13.
- d) Work Buddy / Mentor will:
- work closely with the new employee during the first week of employment.
 - Ensure that the new employee is comfortable and familiar with the requirements of the job.
 - Facilitate communication of any task related difficulties between the new hire and the supervisor.
 - Ensure the new employee understands and uses safe work practices.
- e) General Safety Orientation
- i. The General Safety Orientation will be provided by the Health and Safety Representative for all new ROSSCLAIR hires prior to starting the job.
 - ii. The Site Supervisor or designate will provide the General Safety Orientation to all Subcontractors/Contractors.
 - iii. The General Safety Orientation will consist of the formal documentation of general safety requirements and verification of worker competency.
 - iv. General Safety orientation is an overview of the essential regulatory and

organizational requirements. It would include:

- Legislated Health and Safety Responsibilities
- ROSSCLAIR Health and Safety rules and safe work practices
- Role of the Health & Safety Representative and JHSC
- Use of applicable PPE (personal protective equipment)
- Reporting of injuries and occupational illnesses
- Reporting and correcting of hazards
- Refusing unsafe work
- Emergency procedures
- WHMIS
- Workplace Violence and Harassment
- Code of Conduct

f) Job Specific Training

- i. The Job Specific Training covers the essential, job specific health & safety requirements not discussed in the general safety orientation.
- ii. The Job Specific Orientation must be completed prior to the worker commencing duties for both field operations and administration.
- iii. The job specific should include a walking tour of the site. Items to be addressed include:

<input type="checkbox"/> Job specific safe work procedures	<input type="checkbox"/> MSD Prevention
<input type="checkbox"/> PPE use, care and maintenance	<input type="checkbox"/> Slips, trips, falls
<input type="checkbox"/> Workplace inspections and the worker(s) role	<input type="checkbox"/> Driver Safety
<input type="checkbox"/> Emergency preparedness procedures	<input type="checkbox"/> Lockout and Tag Out
<input type="checkbox"/> Mobile equipment	<input type="checkbox"/> Return to Work
	<input type="checkbox"/> Safe job procedures, and job hazard analysis

g) Supervisor/Manager Training

- i. Managers and Supervisors are responsible and accountable for the day to day management and promotion of safe work procedures. Supervisors also train employees, therefore ensuring they are competent is crucial.
- ii. Supervisor basic occupation health and safety awareness training” means, at a minimum, instruction in the following;
 - ✓ The duties and rights of workers under the Act.
 - ✓ The duties of employers and supervisors under the Act.
 - ✓ The roles of health and safety representatives and joint health and safety committees under the Act.
 - ✓ The roles of the Ministry, the Workplace Safety and Insurance Board and entities designated under section 22.5 of the Act with respect to occupational health and safety.

- ✓ How to recognize, assess and control workplace hazards, and evaluate those controls.
 - ✓ Sources of information on occupational health and safety.
- iii. Additional competencies required for Supervisors includes:
- Ensuring each employee is fully trained and has adequate, safe equipment to use
 - Conducting formal and informal inspections
 - Recognition of hazards and advising workers of any hazards
 - Participating in safety meetings
 - Giving complete, specific job instructions
 - Ensuring that employees wear personal protective equipment
 - Enforcing the use of safety operating procedures and adherence to company policies
 - Conducting accident investigations
 - Setting a good example
- iv. Key elements to effective competent supervision include:
- Assessing the workplace, equipment and employees
 - Emphasize safe behaviour
 - Model safe behaviour
 - Conduct ongoing training
 - Consistently correct unsafe behaviour
 - Correct unsafe conditions without undue delay
 - Promote safe culture
 - Be a Safety Ambassador
- h) Verification of Training
- i. Records of training are mandatory, this is vital due diligence to show compliance and assists in tracking worker training, identifying training needs, eliminating unnecessary repeat of training.
- ii. Here are some important guidelines:
- Keep records of all on the job training and forward applicable copies to the Health and Safety Program Coordinator
 - Obtain copies and verify any trade qualifications. This includes qualifications such as trade certification, first aid tickets, etc.
 - Keep records of specialized education (e.g. defensive driving, WHMIS, Propane handling, Working at Heights)
 - Keep records of all training in emergency procedures
 - Record situations in which the employee had to be corrected on the job for a serious safety infraction and the resulting retraining that was done.
- i) Ongoing Training
- Training should be a continuous process for all workers. There are several ways Supervisors can deliver ongoing training.
- i. Continuous Monitoring and Evaluation

- ✓ Always watch for health and safety concerns and commenting regularly on what you see.
- ✓ Comment every single time you see an unsafe condition or an unsafe act. If you see something and let it go, you might as well tell the person: “Don’t believe what I said earlier about that safety practice; it’s not really important.”

ii. Job Coaching

Job performance coaching is the day-to-day actions taken to help employees perform as well as possible. There are two kinds of job coaching:

- ✓ Corrective coaching to get people back on track; to resolve performance problems
- ✓ Developmental coaching to keep people on the right track and to help them learn, grow and make progress

This can be accomplished utilizing a safety observation form to be completed daily by the supervisor.

Coaching Tips

- Emphasize performance, not personality
- Use facts and examples
- Avoid “ancient history”
- Show both the improvements and problems
- Don’t hide things
- Keep confidences

Key Points Tips

- Give employees helpful hints, suggestions, reminders, or tips about key quality, efficiency and safety points. The best tips are short reminders offered informally and constantly.
- Safety talks show your company’s commitment to health and safety and are important contributors to worker safety. Safety talks may cover a wide range of topics. Safety talks are also called toolbox talks and tailgate talks.
- Spend about two-thirds of your time presenting information on that day’s topic and leave one-third for questions or discussion. Encourage discussion, but keep it focused.
- Safety meetings provide an opportunity for two-way dialogue where everyone has an equal chance to raise and discuss safety issues. Safety meetings should be held with approximately the same frequency as safety talks (i.e. weekly), so that combining the two safety activities will seem to be a natural fit. In some cases, it may be better to have weekly safety talks and monthly safety meetings.
- Structured training sessions work well for some training requirements. This type of training is most effective when the learner applies the newly learned skills, knowledge, and abilities right away. You may want to

develop your own training or arrange to have a workshop done by a professional trainer.

- The length and the content of the sessions will depend on what you expect the trainees to learn.

- j) Completed health and safety training, both external and internal, for each worker will be inputted into the Health & Safety Training Matrix by the Health and SFETY Program Coordinator or designate.

- k) Training Needs Review
 1. The Health and Safety Program Coordinator or designate will perform a review of the Health and Safety Program annually.
 2. Any deficiencies in the program will be identified in an Action Plan to implement any corrective actions required.
 3. The training needs review will cover the following elements:
 - Any legislative changes that impact our business operations.
 - All job documents.
 - Current and upcoming projects (if known)
 - Previous year's training records to verify all required safety training was completed.
 - Employee certifications and recertification dates.
 - Proposed budget for next year for health and safety training programs.
 - Established schedules for training requirements for upcoming year.
 - Evaluation of training provided by reviewing results of any testing or quizzes performed.
 4. Based on the annual review, any program changes, communication or training requirements will be identified, assigned and tracked in our Safety Action Plan as part of the continuous improvement program.

- l) The Health and Safety Program Coordinator or designate will develop a Training Matrix to track and schedule training needs.

- m) Evaluation

As orientation and training are completed, each individual supervisor will review training verification documents and periodically observe worker(s) to measure ongoing effectiveness of orientation policy and procedures.

- n) Communication
 - i. All workers will receive communication about the orientation policy through the new hire orientation within 24 hours of the hire date via formal general hire safety documentation.
 - ii. Job specific orientation will be communicated through a formalized training session prior to commencing duties for both field workers and administrative workers.
 - iii. The Orientation policy will also be communicated to all workers through ongoing training processes; safety meetings, tool box meetings, bulletins and through

the safety binder.

iv. Elements of the Health and Safety Program will be communicated and distributed to all our subcontractors and employees upon request and as part of:

- Employee Orientation
- Subcontractor Safety Package
- Posted on all Health & Safety Communication Boards, office and at projects sites
- Safety Talks or Toolbox Talks
- Payroll mail out

V. Distribution

- a) All workers will receive a formal general hire orientation 24 hours from the hire date consisting of a formal training and verification confirming the worker's competence with content.
- b) All workers will receive a formal job specific training session with a content verification ensuring worker(s) competency in writing.
- c) Ongoing training will be provided to all workers periodically through various methods such as formalized training sessions, health & safety meetings, safety tool box meetings and bulletins.

VI. Reference Documents

- Record of Training (Internal)
- Training Matrix

8.2 Job Induction

I. Purpose

- a) To train new or transferred employees in a new job or workplace, as well as Contractors;
- b) Create a standard to equate workers with actual or potential hazards associated with the work and the existing safe work practices, procedures and safety rules that are in place, and
- c) To promote an attitude of general health and safety awareness.

II. Responsibilities

- a) Senior Management shall ensure that:
 - This procedure is implemented and adhered to at all ROSSCLAIR workplaces.
 - The resources and training have been provided to personnel to do the work safely.
 - This document is periodically reviewed for adequacy and redistributed.
- b) The Project Manager and Site Supervisor are responsible for:
 - Identifying the required competencies needed to perform tasks safely.
 - Monitoring new workers, including providing a mentor or buddy when warranted.
- c) New workers must understand the information provided. If the job induction process is moving at a pace faster than the worker can retain the information, the worker must notify their supervisor.

III. Procedure

- a) The hiring Manager shall ensure that the:
 - New or transferred employee or Contractor knows, understands and follows the rules and regulations of ROSSCLAIR and the ***Occupational Health and Safety Act***
 - The employee is trained in all aspects of the new job, including the safety requirements
 - The importance of reporting all injuries no matter how minor is clearly explained
 - The worker is aware of their responsibility to report any unsafe conditions and encourage the worker to do so by reinforcing that management is interested in correcting unsafe conditions and that their cooperation is important
 - The **Personal Protective Equipment** (PPE) required on the job is reviewed, it's use demonstrated and discuss when and why it is required, how it is to be used to provide the intended protection and how it should be maintained and

stored

- The worker is shown the location of the nearest **Fire Extinguisher** and given a basic demonstration on its use. They will also ensure that the worker is knowledgeable of evacuation procedures and **Exit Routes** in an emergency
 - Emphasis on good housekeeping practices is given and explain individual worker responsibilities
 - Safe lifting practices are demonstrated, and good body mechanics are displayed that will assist in maintaining a healthy back
- b) The new hire will:
- Be shown how to perform the new tasks either by the supervisor or by a knowledgeable employee.
 - Spend as much time as reasonably needed to learn the new tasks involved in the new job
 - Attempt to perform the job alone, but under the supervision of the supervisor or the employee who performed the training, once the worker is confident in the training received to perform the job safely.
- c) The supervisor will appraise the performance of the employee using a Check List to evaluate the knowledge of the employee on the new job. This Check List will be documented and kept in the employee's file,
- d) Once the training has been conducted and the employee is performing the job without any assistance, they will comply with the new job description along with the rules of safety and health established by ROSSCLAIR

IV. Distribution

- a) This procedure is available on the ROSSCLAIR intranet.
- b) A copy of this procedure is available in the Site Safety Plan.

V. Reference Document

- New Employee Step by Step Procedure
- Employee Safety Orientation and Training
- Sub-trade Site Orientation & Training Sign-off
- Safe Job Procedure Sign Off

8.3 Safety Talks

I. Purpose

To create a method for communicating continual updates on Health and Safety concerns and industry standards.

II. Responsibilities

- a) The Senior Management shall ensure that:
 - This procedure is implemented and adhered to at all ROSSCLAIR workplaces.
 - The resources and training have been provided to personnel to do the work safely.
 - This document is periodically reviewed for adequacy
- b) The Health and Safety Program Coordinator or designate is responsible for pulling paperwork together at the end of each month for the next set of talks. They will distribute and create copies as required.
- c) Within the first week of the month supervisors are required to conduct safety talks. These Safety Talks are listed in the Trainer's Manual and templates.

III. Procedure

- a) The Supervisor is required, by month end, to randomly interview and verify training took place.
 - ✓ Check off where applicable
 - Paperwork pulled and copied as required
 - Safety Talk conducted and signed off
 - ROT entry into training records completed
 - Manager made aware of completion of this month's talk and subject matter
 - Manager to randomly interview a participant and verify training
 - Sign off by Manager to be entered into the ROT
- b) The safety talks supplied within the program are to be reviewed annually. They are not all inclusive. See templates in Site Safety Manual.
- c) Modifications, additions and or substitution can be made dependent on factors like accidents/incidents, new processes or directives occurring in the workplace.

IV. Distribution

- a) Specific Safety Talks have been developed and are in the Site Safety Plan.
- b) A copy of this procedure will be available in the Site Safety Plan.
- c) Completed Safety talks are submitted by the Supervisor to the main Office weekly.
- d) Original copies of signed safety talks are to remain at the project site until the

job is completed. Upon completion of the project, the originals documents are submitted along with the Site Safety Plan.

V. Reference Documents

- Sample Safety Talks

Element 9 Workplace Inspection

9.1 Workplace Inspections

I. Purpose

- a) To identify hazards and prevent injuries and illnesses through critical examination of the workplace and work practices.
- b) To verify compliance of Subcontractors/Contractors performing work on our behalf.

II. Responsibilities

- a) Senior Management shall:
 - Inspect the critical areas of the workplace twice a year as per posted schedule.
 - Involve the participation of Supervisors and the Joint Health and Safety Committee/Health and Safety Representative in scheduled inspections. Senior Management may choose to coordinate their inspection with the JHSC inspection for that month.
 - Engage employees in discussing health and safety issues that arise during the inspection.
 - Document the workplace inspection findings and assign responsibility for corrective actions and follow-up to ensure these actions have been completed.
- b) Project Manager and Site Supervisor shall:
 - Perform daily inspections using the Daily Hazard Assessment checklist provided.
 - Perform weekly observations of Subcontractors and job site inspections.
 - Participate in **monthly** inspections at the jobsite with the worker Health and Safety Representative.
 - Take corrective action on hazards or conditions identified and bring to Senior Managements attention the conditions they are unable to address.
 - Inform workers of any conditions or hazards they are aware of and ensure controls are in place to protect workers.
 - Follow up on concerns submitted to Senior Management for corrective action and ensure completion.
 - Engage employees in discussing health and safety issues that arise during the inspection
 - Ensure training is provided for those responsible for performing workplace inspections
- c) Health and Safety Representatives shall:
 - Perform monthly workplace inspections as described in detail in the Joint Health and Safety Committee (element 16).
 - Identify hazards and make recommendations for controls as appropriate.

- Participate in development/review of checklists
- d) Health and Safety Program Coordinator shall:
- Maintain records required by this procedure.
 - Perform monthly inspections with Health and Safety Representative.
 - Review all inspection reports and identify trends.
 - Verify workplace inspections are being performed as required.
- e) Subcontractor/Contractor Supervisor shall:
- Perform daily job hazard assessments. If the Subcontractor/Contractor does not have a procedure for completing this, then the Daily Hazard Assessment checklist may be utilized.
 - Participate in monthly inspections at the jobsite with the worker Health and Safety Representative.
 - Take corrective action on hazards or conditions identified and bring to Site Supervisor's attention the conditions they are unable to address.
 - Inform the Site Supervisor of any conditions or hazards they are aware of and ensure controls are in place to protect workers.

III. Procedure

Planned Inspections

- a) Senior Management will perform two inspections a year covering critical areas of the workplace.
- b) Project Managers shall conduct a monthly inspection of their jobsites.
- c) Site Supervisors will conduct a daily job hazard assessment and participate in monthly inspections with worker representatives.
- d) Health and Safety Representatives will conduct a monthly inspection of the jobsite and the worker member from the JHSC will perform a monthly inspection of the head office. During these inspections every effort will be made to communicate with workers in the respective workplaces to ensure identification of safety concerns. These concerns will be documented on the workplace inspection forms.

Conducting the Inspection

- e) Prior to conducting the inspection, the inspector/team will review records pertaining to their workplace which include, but are not limited to:
 - The last three workplace inspection reports,
 - Injury analysis and first aid records
 - The safety follow-up sheet (for items to be completed and still outstanding.
- f) The inspector/team(s) will complete the inspection using the appropriate checklist and recording substandard conditions or practices on the "Workplace Inspection Record Form".

Note: Inspections should not take place unless work is being performed and it is desirable that inspections take place during various days and times.

- g) The inspector/team(s) will notify the supervisor immediately of any significant health and safety concerns. The worker representative can request a meeting with the Supervisor to discuss an item of significant health and safety concern.
- h) When the inspection is complete, the inspector/team(s) will complete the form and checklist and provide copies to the Supervisor and Health and Safety Coordinator. The Supervisor will record on the inspection record form what items have been addressed/ will be addressed, how, by whom, and when, and will forward this to the Health and Safety Coordinator within 5 working days.
- i) The Health and Safety Program Coordinator will record planned items on the safety follow up report and will make recommendations to the Senior Management on items that the Supervisor could not address, or on patterns/other items of note as appropriate.
- j) Completed inspections are to be forwarded to the Health and Safety Program Coordinator.
- k) The workplace inspection reports will be reviewed by the JHSC and the development of recommendations, as needed, to senior management.
- l) The Health and Safety Coordinator will maintain records of the inspections, and inspection reports will be posted with the minutes of any Health and Safety Representative meetings.

Training

- m) Inspectors will be trained in hazard identification techniques, risk assessment and hazard classification, problem solving and control of hazards, as well as reporting protocols.
- n) Training on workplace inspections will be provided by the employer through an external service provider or internal company trainer.

Evaluation

- o) The JHSC will review all workplace inspection reports and monitor the program to ensure compliance.

IV. Distribution

Introduced at Orientation, reviewed annually with all employees through Health and Safety Manual and Employee Handbook.

V. Reference Documents

- Weekly Focused Observation Form
- Daily Job Hazard Assessment
- Workplace Inspection Schedule
- Summary Action Plan

9.2 Pre-Use Inspection Program

I. Purpose

To provide a procedure to ensure that all company equipment is in safe working order and any deficiencies are identified and corrected so as to prevent potential breakdowns, accidents, injuries and illnesses.

II. Responsibilities

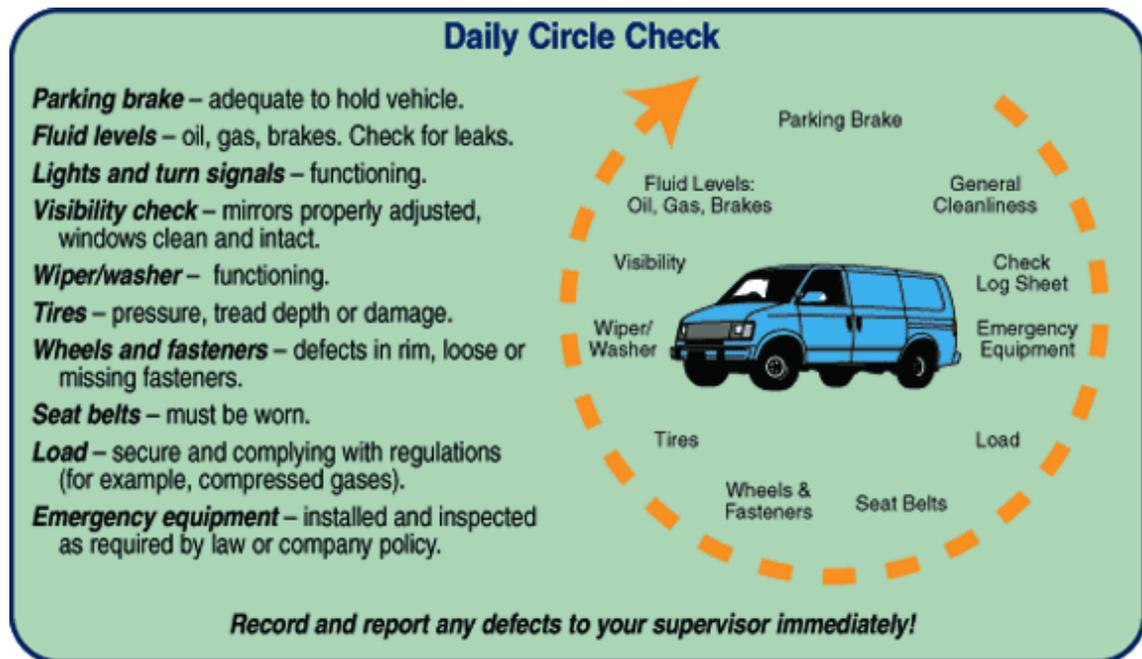
- a) Senior Management shall ensure that:
 - A pre-use inspection program is implemented for equipment owned or leased by Company.
 - Responsibility is assigned to monitor the pre-use inspection program.
 - All company equipment is maintained in a safe operating state by performing all preventive maintenance requirements and inspections.
 - Documentation and inspection/maintenance records are maintained for each piece of equipment owned or leased by the company
- b) Project Managers and Site Supervisors is responsible for ensuring:
 - Pre-use inspections are performed.
 - Repairs, maintenance and inspections are performed on equipment as identified.
 - Only trained and authorized employees are permitted to operate company equipment.
 - Training is provided, and worker competency is verified why carrying out workplace inspections.
 - Documentation is maintained as identified in Preventive Maintenance Program.
- c) Workers are responsible for:
 - Performing documented pre-use inspections as required.
 - Reporting any unsafe conditions or work practices to their Supervisor.
 - Only operating company equipment that they have been trained and authorized to use by their Supervisor.
- d) Health and Safety Representative is responsible for monitoring the program effectiveness and making recommendations to correct deficiencies.

III. Procedure

- a) Site Supervisors will randomly verify the completion of any pre-use inspections for any Subcontractor/Contractor owned or operated equipment on ROSSCLAIR jobsites. This will be documented on the Weekly Supervisor Inspection.
- b) All operators of designated commercial vehicles will conduct a pre-trip circle check daily prior to use and will follow Commercial Vehicle Regulations with regards to logbook recording.

- c) All ROSSCLAIR Employees who operate a vehicle for business purposes will be trained in vehicle circle check procedures during orientation. This will ensure the following:
 - Vehicles have been properly maintained and are safe to operate
 - All safety precautions will be adhered to while operating a vehicle
 - A safe working environment for all vehicle operators exists.
- d) All vehicle operators will be required to complete a vehicle circle check prior to entering the vehicle at the commencement of each shift.
- e) When completing a circle check, always start at the front of the vehicle on the driver's side and walk towards the back side, checking all items included on the vehicle check list. Completing the check list before entering the vehicle ensures that the driver has performed a pre-trip inspection and has determined the vehicle to be safe to operate
- f) The Pre-Trip Vehicle Inspection Form must be kept in the vehicle upon daily completion and then forwarded to the respective supervisor at the end of each week.

Note: Immediately report all vehicle defects that may impede you from completing your job safely.



- g) All company owned vehicles will be provided with, a minimum of, a #1 First Aid Kit, a First Aid Treatment Log, a Regulation 1101 guide and a 5lb Fire Extinguisher, to be maintained in the vehicle always.
- h) First Aid Kits are to be stocked and maintained as per Regulation 1101 always. Monthly Inspections will be conducted a First Aid Kit Inspection sheet. Employees will immediately notify the Health and Safety Representative if any item requires

replenishment.

- i) Every vehicle containing a First Aid Kit must also keep a First Aid Log. Each and every time an item is removed from the First Aid Kit, it shall be recorded on the Treatment Log. The First Aid Treatment Log enables the company to identify accident history and trends to ensure that adequate health and safety controls exist.
- j) Vehicle Fire Extinguishers are to be inspected Monthly using the Fire Extinguisher Checklist. Employees are to notify their Supervisor immediately of any item that requires attention. Fire Extinguisher Checklists shall be maintained in the respective vehicle at all times.
- k) Pre-use inspections for mobile equipment such as forklifts must be conducted by a competent person. Any deficiencies must be recorded and immediately reported to the Supervisor.
- l) Records of all vehicle inspections will be maintained by the Health and Safety Program Coordinator.

IV. Distribution

Introduced at Orientation, reviewed annually with all employees through Health and Safety Manual and Employee Handbook

V. Reference Documents

- Pre-Trip Vehicle Inspection
- Daily Pre-Use Inspection (Forklift)

Element 10 Incident Investigation

10.1 Accident/Incident Investigation

I. Purpose

- a) Create a summary of the actions to be taken and documents to be used following a work-related injury.
- b) Outline the requirements, methods and outcomes of reporting all occupational injuries and illnesses.

II. Responsibilities

- a) Senior Management shall ensure that:
 - This procedure is implemented.
 - An adequate number of workers are trained in first aid.
 - Incident investigation is completed in the case of serious incidents upon notification of injury; and in the case of all other listed incident investigation is submitted within 24 hours of the incident.
 - Supervisors and Health & Safety Representatives receive training with regards to the incident investigation procedures.
 - Notify family members of injured worker where necessary
 - Submitted incident investigation reports are reviewed and corrective actions to prevent reoccurrence are identified, assigned and verified
 - Follow up on the corrective action is documented; and outlines what has been done, who has completed the actions, when they were completed and to identify the effectiveness of the corrective action in prevention of reoccurrence
 - Joint Health & Safety Committee members receive training about carrying out and participating incident investigations.
- b) The Project Manager and or Site Supervisor shall:
 - Promptly ensure that first aid is administered and recorded
 - Ensure the worker is given subsequent medical treatment if necessary and ensuring the worker has a safe mode of transportation (ambulance or taxi) to medical facility.
 - Emergency services are notified as may be appropriate, rescue/response teams
 - Notify appropriate personnel as soon as possible after an incident.
 - Investigate the injury/incident and completing the investigation report within 24 hours of the injury/incident
 - In the case of personal injury, the supervisor ensures that the injured

employee(s) receives appropriate medical treatment.

- Notify the Health and Safety Representative, so they may assist in the investigation.
 - Inform the Health and Safety Program Coordinator as soon as possible.
 - Secure and manage the accident scene until completion of investigation or until permission has been given by the MOL Inspector.
- c) Joint Health and Safety Committee Worker Representative/Health and Safety Representative is responsible for:
- Participating in the investigation of a fatality or critical injury.
 - Working with the supervisor to conduct the investigation and assist in completing the report. Both the supervisor and worker representative sign the injury/incident investigation report.
 - Submitting a copy of the injury/incident investigation to the appropriate authority when required.
 - Ensuring the checklist and investigation reports are completed and signed by the appropriate worker and management representative of the JHSC
- d) Trained First Aid Responder
- Upon being informed of an injured or ill worker, a qualified first aid provider will administer appropriate first aid treatment.
 - Complete a First Aid Report, including a statement of what treatment or advice was given to the injured worker.
 - Will assist as necessary, in ensuring that an injured or ill worker receives subsequent medical attention as required.
- e) All workers shall:
- Immediately report any injury or occupational illness to their Supervisor or Manager. If because of the nature of the injury or illness, an employee is unable to report, it is the responsibility of another worker, who happens upon the incapacitated worker, to promptly report the event to a Supervisor or Manager

III. Definitions

Critical Injury: Regulation 834 Critical Injury Defined:

A critical injury means an injury of a serious nature that:

- a) places a life in jeopardy;
- b) produces unconsciousness;
- c) results in a substantial loss of blood;
- d) involves the fracture of a leg or arm but not a finger or toe;
- e) involves the amputation of a leg, arm, hand or foot but not a finger or toe;

- f) consists of burns to a major portion of the body; or
- g) causes the loss of sight in an eye.

First Aid: A work-related injury that is defined as “any one treatment of minor scratches, cuts, burns, splinters and so forth, which can be treated by Certified First Aider”.

Lost Time Illness/Injury: A work-related illness/injury where offsite medical attention is required, and work time is lost beyond the day of injury. (Offsite medical attention refers to Walk in Clinic, Emergency Department or Treating Physician)

Medical Aid: A work-related injury where offsite medical attention is required but no time is lost from work other than the day of injury.

Near Miss: An undesired event that could have under different circumstances resulted in an accident with the potential to cause injury, property damage, or loss of productivity

Occupational Illness: A condition that results from exposure in a workplace to a physical, chemical or biological agent to the extent that the normal physiological mechanisms are affected, and the health of the worker is impaired.

IV. Methodology

The only difference between an incident and an accident is the outcome, the fact is there is an uncontrolled or inadequately controlled hazard in the workplace. Accident and incident investigations are about “fact finding” so that the hazard can be properly identified, and recommendations can be made and implemented to prevent reoccurrence. The process for proper investigation includes:

- a) Scene Assessment
 - Make observations, onsite assessment of the scene (site, equipment, material)
 - Use photographs, sketches, drawings etc.
- b) Identify Contributing Factors, such as:
 - People – witnesses, competency, etc.,
 - Equipment – damaged, wrong tool for the job, missing?
 - Materials – heavy, toxic,
 - Environment – fast paced, congested, poor lighting, temperature
 - Process – Safe Job Procedure, New Worker Orientation, preventative maintenance etc.
- c) Conduct Interviews
 - Interview workers involved
 - Interview witnesses
 - Interview outside experts if necessary

- Ensure the interviews are conducted as soon as reasonably possible
 - The interviews should be conducted in a quiet place, one on one and must be documented.
 - Conduct in a quiet area
 - Ask open, not leading questions
- d) Write Report
- Be clear and concise.
 - Complete all sections of the Injury/Incident Report,
 - Identifying immediate and the underlying root causes. Ask why 5 times!
 - Recommendations for corrective action should address the identified immediate and root causes. All actions should be assigned to individuals and include priority.
- e) Follow-up on recommendations
- Verify corrective actions are effective at controlling hazard.

V. Procedure

- a) Transportation of injured worker:
- i. ROSSCLAIR must ensure that transportation of an injured employee to the nearest medical treatment facility is available when necessary. The first method of transportation is an ambulance. Should this method of transportation not be appropriate then a taxi, or a Manager will appoint a competent person to transport the injured worker, accompanied by the first aid attendant.
 - ii. First aid responder traveling with the injured worker will:
 - Continue to administer first aid as required.
 - Provide the medical facility with the medical injury and keep the employer up to date as to the ongoing status of the injured worker
 - iii. Should the employee refuse the transportation, the company will attempt to:
 - Identify any other acceptable transportation methods the worker would prefer.
 - Reiterate the importance of accepting the transportation to the hospital, doctor's office, clinic or worker's home.
 - Call 911 and get the ambulance attendant to administer medical attention onsite.
 - Contact the employee's emergency contact person for transportation assistance.

- The worker will not be permitted to continue work until medical clearance is provided.
- b) In case of AN INCIDENT
- i. The worker will:
 - Report any incident to their Supervisor.
 - Explain what happened and how the incident occurred.
 - ii. The Supervisor will:
 - Record the incident and submit the report to Senior Management.
 - Be specific and include the time, date, the explanation of the worker and the corrective actions taken (if any).
 - iii. Senior Management will provide a copy of the report to the JHSC for review at their next scheduled meeting.
- c) In case of AN ACCIDENT
- i. The worker will:
 - Immediately report accident to Supervisor
 - Not disturb the work area where the accident has occurred.
 - ii. The Supervisor will:
 - Assess the injury and have a certified first aid responder attend to the injury and/or arrange transportation of the worker to a designated medical facility.
 - Notify Senior Management of the accident.
 - Perform an investigation of the accident scene. If available, include the injured worker in the investigation process.
- d) In case of A CRITICAL INJURY of a worker
- i. The worker will:
 - Immediately report accident to Supervisor and explain what has occurred.
 - Not disturb the work area where the accident has occurred
 - ii. The Supervisor will:
 - Ensure that the emergency services have been notified—call 911
 - Assess the injury and have a certified first aid responder attend to the injury or attempt to keep the worker conscious or comfortable while awaiting professional services.
 - Secure the accident scene by erecting a barrier or cordoning off an area preventing access.

- If a piece of evidence must be moved (to relieve human suffering), then a picture or representative drawing will be taken to record the actual layout of the area
 - Notify Senior Management.
 - iii. Senior Management will:
 - Immediately notify the Joint Health and Safety Committee and Ministry of Labour and advise of accident.
 - Submit a written report of the occurrence within 48hrs to the Ministry of Labour using the Accident Investigation Report - Critical Injury or Fatality form.
 - Ensure a proper investigation team is created, at minimum the JHSC and Supervisor, to perform an accident investigation. All evidence and information shall be gathered to discover the root cause of the accident. After the information is gathered, the Manager with the JHSC Representatives will analyze it and make known their findings and recommendations to avoid a recurrence or related accidents or incidents.
- e) Investigation Process
 - i. Control the scene by taping or marking off area to ensure the area and evidence are not disrupted. (“Control the Scene”)
 - ii. The investigator should:
 - Take pictures of the scene
 - Review any related documents and records
 - Inspection of the site/equipment/material that was involved in the injury/incident
 - Use of photographs/sketches/drawings of the incident scene indicating sizes, distances, and weights of objects or appropriate
 - Witnesses should be interviewed (using a “witness statement form”) and people involved also to be interviewed
 - iii. Incident Analysis
 - Identify all contributing factors to control the probability of reoccurrence. Identification of immediate and root causes taking into consideration the following factors that may have acted alone or interacted with one another such as:
 - People
 - Equipment
 - Material
 - Environment

- Process

iv. During the investigation, the investigator will ensure the incident investigation report is completed, the employee completes a report of incident and witness statements are documented on the witness statement form.

f) Motor Vehicle Accident

The following shall take place when a vehicle accident occurs:

- Control the scene and prevent further injury or damage to anyone involved.
- Notify your Supervisor immediately and they will notify the appropriate personnel.
- Take pictures of the scene, where appropriate.
- Complete a Vehicle Accident Report, attach any other pertinent reports, and hand it in by the end of the shift to your Supervisor who will review and submit to Senior Management.

g) The Accident/Incident Investigation Report:

- i. Remember that this report could be later used in a Court of Law. It should only contain facts, and not opinions! It must document the people involved, the equipment used, the place, time, and type of injury, as well as any other objective observations.
- ii. The investigation report should be as detailed as possible and include all photos, interviews, and diagrams taken in the investigation. The report should include:
 - Who was involved, who witnessed, when it happened, where it happened
 - State specifics of medical treatment and follow-up
 - Description of what happened (sequence of events)
 - List of machines/equipment or materials involved
 - Record all corrective action taken to improve the workplace for the future and complete a follow-up post-accident to ensure measures are being accepted.
 - Information about the work procedures and training provided
 - List of corrective actions taken with date and recommendations on how to prevent it from happening again. Indicate the recommendations that need approval of other authorities.
 - Contain an authorized signature and title, as well as the date of the report.

Note: Copies to be forwarded to the employer, with copies for the JHSC and other

authorities.

- h) All Senior Management, Supervisors and Joint Health and Safety Committee Representatives will be trained in injury/incident investigation procedures by a recognized company approved training provider. This training will occur within the first month of appointment of a Joint Health and Safety Committee Representative or a management position.

VI. Distribution

- a) A copy of this procedure is available in the Site Safety Plan.
- b) This procedure is communicated to all management and employees through:
 - Employee Handbook and new employee orientation.
 - Job Safety Talks
 - Employee performance counseling sessions for non-compliance.

VII. Reference Documents

- Incident/ Near Miss Investigation Report Form
- Accident Investigation Report
- Critical Injury Checklist
- Accident Reporting Table

Element 11 Emergency Preparedness

11.1 Emergency Preparedness

I. Purpose

To clearly define specific roles and responsibilities to potential emergency scenarios.

II. Responsibilities

a) Senior Management will:

- Develop specific plans and procedures to identify response requirements.
- Assign a person as an Emergency Response Coordinator.
- Implement and practice emergency evacuation plans annually

b) Site Supervisor will:

- Be knowledgeable of emergency plans and implement at jobsite as required.
- Train workers on the emergency response plans at the jobsite, including:
 - Location of emergency equipment
 - Egress routes and assembly areas

c) Employees participate in emergency drills.

d) Joint Health and Safety Committee and Health and Safety Representatives will monitor the effectiveness of the emergency plans and make recommendations for improvements

III. Procedure

a) As part of a detailed emergency preparedness program ROSSCLAIR will include the following elements in our emergency plans, programs or procedures:

- Emergency Notification
- Evacuation Procedure
- Emergency Equipment
- Emergency Plans:
 - Fire or explosion
 - Chemical Spill/ Gas Leak
 - Power Failure
 - Severe Weather.

IV. Distribution

- a) Copies of the emergency response plans will be provided to all Site Supervisors and shall remain onsite for the duration of the project.
- b) Copies of the emergency numbers will be posted on all health and safety boards.

VIII. Reference Documents

- 11.2 Emergency Notification
- 11.3 General Emergency
- 11.4 Fire Safety Plan
- 11.5 Power Failure
- 11.6 Severe Weather
- 11.7 Chemical Spill Response
- 11.8 Emergency Equipment

11.2 Emergency Notification

I. Purpose

Provide a means of alerting staff or other persons of an emergency that requires evacuation of the facility. ROSSCLAIR has placed air horns throughout our facility to alert others onsite others on site that there is an emergency that requires the immediate evacuation of the facility.

II. Responsibilities

- a) Senior management will ensure that workers are aware of the location of emergency numbers and the priority for notification.
- b) Project Managers and Site Supervisors shall ensure the Emergency Notification is:
 - Complete and reflective of the emergency numbers for the respective job site
 - Posted on the Health & Safety Communication Board.
- c) All workers will be familiar with the location of emergency notification numbers and the priority for making such notifications.
- d) The Joint Health and Safety Committee/Health and Health and Safety Representatives (JHSC/HSR) will ensure that emergency numbers are posted on the communication board(s).

III. Procedure

- a) An emergency notification and phone number list of all emergency services must be posted on the Health & Safety Communication Board.
- b) An annual review of this list will be performed by the JHSC/HSR to ensure the provided numbers are correct.

IV. Distribution

- a) A copy of the completed Emergency Notification shall be located on each health and safety communication board.
- b) A copy of the completed Emergency Notification will be found at each jobsite in the Site Program Manual.

V. Reference Documents

- Emergency Notification

11.3 General Emergency Procedures

I. Purpose

- a) To have a viable plan that shall ensure effective and efficient response to all types of emergencies.
- b) To prevent injuries, reduce property damage and minimize down time.

II. Responsibilities

- a) *Senior Management* will be responsible for:
 - The coordination of the emergency response and evacuation procedures
 - Appointing the Emergency Plan Coordinators.
- a) The *Emergency Plan Coordinator* is responsible for:
 - Coordinating all emergency response activities.
 - Recognizing that the company's highest priority is employee health and safety and that this takes precedence over all other priorities
 - Alerting and being the primary liaison with emergency service providers.
 - Ensuring the directions of the emergency service providers are communicated and followed.
 - Where necessary, providing emergency service providers with access to information as requested.
- b) Workers are responsible for:
 - Exiting the work area in a calm manner, without running or shoving,
 - Immediately gathering in the designated Assembly Area and remaining in the area until the "All Clear" message has been given by the Emergency Plan Coordinator
 - Adhering to the instruction given by the Emergency Plan Coordinator at all times.

III. Procedure

- a) Detailed duties and responsibilities of individuals cannot always be pre-determined. All personnel must recognize that extra duties may be requested during emergencies and must be acted on for the safety of all personnel and equipment.
- b) The appointed Emergency Plan Coordinators are:
 - Head office: Identified on Organizational Chart
 - Job Site: Site Supervisor
- c) The *Emergency Plan Coordinator* shall:
 - Alert staff to the situation through a verbal communication or alternate communication identified on the Emergency Notification list, i.e. 3x air horn blasts (jobsite).

- Remain at the Emergency Control Centre during the incident for personnel safety and effective handling of the incident.
 - Bring to the assembly area:
 - SDS Information binder (if applicable)
 - Visitor/Contractor/Subcontractor Log Book
 - Portable first aid kit
 - Ensure that all personnel have been successfully evacuated.
 - Coordinate an annual practice of the Emergency Procedures (head office only).
- d) *First Aid Staff* will coordinate with external medical personnel who will provide medical assistance.
- e) The notification of relatives and families of any casualties or injuries is the sole responsibility of the *President*. Similarly, all responses to enquiries from family members will be given by the President.
- f) An emergency is defined as a combination of circumstances that calls for immediate action. The types of emergencies the Emergency Procedure shall cover include fire, explosion, gas leak, medical emergency, violence and evacuation because of any of the above within our facility or any neighbouring businesses.
- g) Priority – Personnel People always come first during an emergency. Every effort shall be made to protect the assets of the company, but at no time shall the protection of such assets compromise the safety of personnel.
- h) Emergency Control Centre Emergency Control Centre is the command post for the Emergency Plan Coordinator and shall be located at:
 - Head Office: Reception desk
 - Job Site: Trailer or area previously determined by Site Supervisor in the Site Safety Plan.
- i) Evacuation Alarm Is a verbal announcement by those that find the emergency. An evacuation shall be directed only under the direction of Emergency Plan Coordinator who will alert all other workers via verbal communication.
 - Evacuation Alarm should only be activated if there is an immediate possibility of danger to personnel or if there is a possibility the incident may worsen to the extent of danger to personnel.
- j) Assembly Area Upon notice of evacuation (evacuation alarm) all personnel shall leave their work area via the nearest egress route and go to the assembly area. The assembly areas are:
 - Head Office: Back parking lot
 - Job Site: Area previously determined by Site Supervisor in the Site Safety Plan
- k) Visitors ROSSCLAIR employees are responsible for their visitors and shall ensure the

visitor remains escorted and evacuates when required.

- l) Contractors/Subcontractors are made aware of the Assembly Area during their site orientation and are expected to evacuate as required and to adhere to the direction of the ROSSCLAIR Site Supervisor.
- m) "All Clear" Signal Is a verbal communication from the Emergency Plan Coordinator alerting personnel that the area is safe, and personnel can safely return to the affected area.
 - Please note that in the event of a fire or incident of violence the all clear can only be issued to the Emergency Plan Coordinator by the respective authority, i.e. Fire or Police Department.
 - The Plan Coordinator will conduct a general inspection in conjunction with members of the JHSC before giving the all clear for employees.
- n) Communication with Media and Public
 - Communication with the public and media arising from any emergency is the responsibility of the President. No employees are permitted to communicate with the media.
- o) Search and Rescue Plans ROSSCLAIR is not equipped with the skills or equipment to safely execute search and rescue following an emergency. The assistance of trained professionals such as the fire department and or police, will be requested to perform this task.
- p) Emergency Evacuation Process
 - (1) Phase 1 – Initial Discovery
 - i. Upon discovery of any incident, remain calm and immediately report the incident and its location to the Emergency Plan Coordinator (EPC).
 - ii. The EPC will evaluate the seriousness of the incident, determining if the emergency can be stopped and/or controlled quickly with our existing resources. If the situation requires further action, the EPC shall activate the Standby or Evacuation Alarm.
 - iii. The EPC shall take the action(s) and direct all personnel as the evaluation dictates including ensuring emergency services are contacted.
 - (2) Phase 2 – Response
 - i. Upon being notified of an emergency, the EPC shall attend the Emergency Control Center immediately.
 - The President shall be notified next.
 - ii. If required, the EPC shall contact outside agencies (fire, ambulance, police, etc.) as required, identifying the Company, location and type of incident.
 - iii. When required, the EPC shall designate competent individual(s) to wait at the main entrance to direct the emergency vehicles to the incident location.

- iv. It is important that the emergency vehicle(s) are met and guided to the incident to ensure that Emergency Personnel do not unknowingly enter a hazardous area, it prevents confusion and saves time, and it ensures someone is available to the Emergency Personnel to explain the incident.

(3) Phase 3 – Evacuation

- i. The EPC shall active the evacuation alarm if there is an immediate possibility of danger or there is a possibility the incident may worsen to the extent of danger to personnel.
 - ii. All employees shall stop work immediately, shut down any equipment being used, leave the work area by exiting at the closest, safest exit and go to the Assembly Area using the safest route.
 - iii. Workers shall remain in the Assembly Area, in an orderly manner until the head count is complete.
 - iv. The Emergency Plan Coordinator, upon direction of emergency services, shall be responsible for determining when the emergency is over and when personnel may safely return to their work areas. At this time, the “*ALL CLEAR*” signal shall be communicated to all staff
- q) Power Failure If it is safe to do so, please turn off or unplug any/all equipment you are working. This prevents accidental re-energization of equipment when the power has been restored and follow direction of Emergency Plan Coordinator.
- r) Review of Emergency Procedure is conducted to ensure the plan continues to be effective at safely addressing emergency scenarios.
- The Emergency Plan Coordinator shall review the plan, make the necessary changes and submit for approval from Senior Management. Upon approval new plans will be forwarded to each site and all old versions will be destroyed. This review shall be performed:
 - after an incident
 - If the physical conditions in the workplace change that might affect the plan
 - At least annually

IV. Distribution

- a) Emergency Telephone Numbers shall be posted on Health & Safety Communication Boards and found within Site Safety Plans.
- b) Emergency Procedures shall be posted on Health & Safety Communication Boards and found within the Site Safety Plans and New Employee Orientation booklets.

V. Reference Documents

- General Emergency Flow Chart
- Key Points to Remember in an Evacuation

11.4 Fire Safety Plan

I. Purpose

- a) To provide a method to ensure systematic and orderly evacuation of the workplace by the nearest and safest means, in the least possible time in case of emergency.
- b) To provide a method to ensure swift and efficient investigation of a possible fire or emergency to minimize any delay in securing the services of the Fire Department when required, with the priority being the safeguarding of human life and preventing the spread of fire.

II. Responsibilities

- a) *Senior Management* shall ensure:
 - A Fire Safety Plan has been developed and implemented with the appropriate responsibilities assigned.
 - Fire safety equipment is made available, inspected and maintained in good working order.
 - Supervisors and workers are trained in fire safety response.
- b) *Supervisor* shall be in complete charge of the Fire Safety Plan and shall ensure:
 - Specific responsibilities have been assigned
 - Workers are educated on their responsibilities and role in the Fire Safety Plan
 - All emergency egress routes are maintained free from obstructions and doors operate freely.
 - Combustibles are not permitted to accumulate in egress routes
 - Fire extinguishers are kept free from obstruction and are inspected monthly.
 - Emergency drills are performed as required by Senior Management
 - The Emergency Evacuation Process (refer 11.3 General Emergency Procedure) is followed in the event an evacuation is required.
- c) *Employees* shall:
 - Listen to instruction provided by the Emergency Plan Coordinator.
 - Only smoke in designated areas.
 - Not obstruct or cause a fire extinguisher, or other fire safety equipment to become obstructed.
 - Evacuate as per the Emergency Evacuation Process.

Note: If you need to open a door to get to an exit, test the door and doorknob for heat before you open it. If the door is cool to the touch, open it slowly and check for smoke. If no smoke is observed proceed to the exit. If smoke or heat is detected, then find an alternate route.

III. Procedure

a) **If you discover a fire**

- (1) Activate or sound the fire alarm.
- (2) Leave the fire area closing all doors behind you.
- (3) Notify other staff and occupants. Notify your Supervisor immediately of the fire location, if the employees in the area have been evacuated and if the fire department has been called.
- (4) Fight the fire only if you are confident that it may be contained with available firefighting equipment.
- (5) Evacuate the building using the closest safe exit.
- (6) If you are the person placing the call to the Fire Department (911), give building name, address, your name, phone number and any other information they may ask for.

Note¹: All persons are required to leave the worksite during an evacuation; however, some may be unavoidably detained. Ensure that an accurate count of personnel left inside is taken and record their exact location. This is very important as a double count may occur and their exact location will eliminate this problem.

Note²: Do not leave injured or persons requiring assistance unattended. Appoint an assistant (employee) to stay with each person and ensure they are escorted to safety.

Note³: Never re-enter the workplace until the "All Clear" signal is given by the Emergency Plan Coordinator.

REFERENCE: FIRE SAFETY PLAN SUPPLEMENTARY DOCUMENT

b) Controlling Fire Hazards

To reduce fire hazards and unsafe conditions in the building, all employees shall:

- Always keep exits, stairways; landings and hallways clear of obstructions and combustible materials.
- Always keep doors to stairways closed.
- Always maintain clear access to fire protection equipment (fire extinguisher)
- Not permit the accumulation of combustible materials in areas that would constitute a fire hazard.
- Promptly remove all combustible waste material from areas where waste is placed for disposal.
- Only smoke in designated areas.
- Never use unsafe electrical equipment and or frayed wiring.
- Store and use flammable and combustible liquids and gases in small

quantities and only in approved containers and locations.

c) Fire Extinguishment or Confinement

In the event of a fire, immediately follow the Emergency Plan procedures.

- **Extinguish** A small fire may be extinguished using a portable fire extinguisher ONLY if the smoke or fire does not present a danger, and if trained on how to use a fire extinguisher. If the fire cannot be extinguished within three (3) to four (4) minutes, the occupants should leave and communicate their situation.
- **Confine** the fire by closing the door(s) in the area and leaving via the nearest safe exit.

Fire Class	Type of Fire	Extinguishing Material	Type of Extinguisher
A	Ordinary combustibles (Paper, wood, textiles etc.)	Water or multipurpose	A or ABC
B	Flammable & combustible liquids and gases	Carbon Dioxide or multipurpose	BC or ABC
C	Electrical fires (wiring, fuse boxes)	Carbon Dioxide or multipurpose	BC or ABC
D	Combustible metals and metal alloys	Dry Powder	D
K	Kitchen (burning fats, grease)	Wet chemical	K

d) General

- Know the location of **Fire Exits**
- Know the correct building address
- Call the **Fire Department** or (Dial 911)
- Report any unsafe conditions to the Supervisor
- Participate in **Fire Drills**

e) Fire Drill Frequency

Fire drills are used to ensure that personnel are familiar with the emergency evacuation procedures and can evacuate in an orderly and expedition fashion to a designated area.

- The frequency of performing fire drills at the head office is annually to verify the effectiveness of evacuating personnel.
- The frequency of performing fire drills at job sites is as needed or as requested. Drills on job sites are an excellent means of determining comprehension of emergency procedures with Contractors/Subcontractors as well as ROSSCLAIR workers.

f) Fire Drill Procedures

- (i) Post advance notices advising of scheduled date and time.
- (ii) Notify the Fire Department and Alarm Monitoring Company prior to and after the drill.
- (iii) Activate the Fire Alarm.
- (iv) Upon completion of the drill, Senior Management will debrief to review overall performance, and post comments and suggestions.
- (v) Keep a record of all fire drills for inspection by the Fire Department.

IV. Distribution

- a) A copy of the Fire Safety Plan will be available in the Site Health & Safety Plan.
- b) All workers will be provided a copy of the Fire Safety Plan during orientation.
- c) The Fire Safety Plan will be available to Visitors and Contractors/Subcontractors upon request.
- d) The site orientation will address responsibilities under the Fire Safety Plan.

V. Reference Documents

- Fire Safety Plan Flow Chart

11.5 Power Failure

I. Purpose

- a) To provide a method to ensure employees' and customer's health and safety are not put at risk due to the integrity of work process or lighting concerns.
- b) To provide swift and efficient response to power emergencies and to minimize any delay in returning services back to normal operations.

II. Responsibilities

- a) Senior Management shall ensure that:
 - A Power Failure Plan is developed, and responsibilities assigned.
 - Emergency lighting is tested and demonstrated to be operational.
 - Personnel are trained in their response requirements.
- b) Emergency Plan Coordinator shall:
 - Oversee the Power Failure Plan
 - Educate and train their staff on their responsibilities
 - Ensure all work processes have ceased during power failure and all personnel on site are accounted for.
 - Inspect the workplace to ensure power failure has not created additional hazards.
 - Secure all entrances to prevent anyone from entering the workplace until power is restored.
 - If power is out for more than 3 minutes, contact Public Utilities to determine return of service time.

III. Procedure

In the event of a power failure:

- a) To prevent accidental start-up of equipment, always switch powered equipment off.
- b) Notify Supervisor of the emergency condition.
- c) Stay where you are and ensure to see if the power will come back on.
 - Evacuate the work area as instructed by the Emergency Plan Coordinator.
 - Do not return to work area until All Clear signal is given by the Emergency Plan Coordinator.

IV. Distribution

- a) A copy of the Power Failure Plan will be available in the Site Health & Safety Plan.
- b) All workers will be provided a copy of the Power Failure Plan during orientation.
- c) The Power Failure Plan will be available to Visitors and Contractors/Subcontractors upon request.
- d) The site orientation will address responsibilities under the Power Failure Plan.

V. Reference Documents

- N/A

11.6 Severe Weather Plan

I. Purpose

- a) To ensure a plan is in place to ensure appropriate action is taken in the event of inclement or severe weather.
- b) To protect those employees who are traveling on the roads.
- c) To minimize any delay in returning services back to normal operations.

II. Responsibilities

- a) *Senior Management* shall:
 - Ensure Severe Weather Plan has been developed and responsibilities assigned.
 - Emergency plan is tested and demonstrated to be effective.
 - Supervisors and workers are trained in their response requirements.
- b) *Emergency Plan Coordinator* shall ensure:
 - The Severe Weather Plan is implemented and followed.
 - Workers, contractors/subcontractors and visitors are all aware of the Severe Weather Plan.
 - Personnel are alerted to severe weather conditions.
 - Personnel seek appropriate shelter during severe weather conditions.
 - Drivers are notified of severe weather alerts that may affect them.

III. Procedure

In the event of severe or inclement weather:

- a) Seek shelter and follow the direction of the Emergency Plan Coordinator in the event of severe weather. If on a jobsite, find shelter in a place that will not have blowing debris or that may collapse in the high wind. Find shelter in a basement or low-lying ditch if possible.
- b) Stay clear of windows and doors (where appropriate). This means do not watch the storm.
- c) Assist the Emergency Plan Coordinator following the adverse weather conditions.
- d) *Drivers* shall:
 - Keep alert to weather conditions in the area where you are traveling, i.e. Radio broadcasts.
 - Ensure that your manager can get a hold of you while you are on the road.
 - Safely pull off the road into a service station or rest area, if caught in adverse driving conditions, and immediately contact Supervisor to alert them of the situation.

- Do not try and drive in severe weather, remain in a safe area.
- If you are in your car and in danger of a tornado, try and get as low to the floorboards of your truck or care as you can. Do not try and get out of your vehicle unless it's safe to do.

IV. Distribution

- A copy of the Severe Weather Plan will be available in the Site Health & Safety Plan.

11.7 Chemical Spill Response

I. Purpose

- a) To ensure a plan is in place have a plan in place to respond to minor or major chemical spills in the workplace.
- b) This procedure covers all of our workplaces where a potential exists for spills of chemical used at during work.

II. Responsibilities

- a) The Senior Management shall ensure:
 - A spill response procedure has been developed and responsibilities assigned.
 - Equipment is in place to respond to an unplanned release.
 - Supervisors and workers are trained in their response requirements.
- b) Project Manager and Site Supervisor shall:
 - Educate and train their staff in the actions to be taken in the event of a spill.
 - Ensure emergency plan for the area has been tested and proven effective.
- c) Employees shall:
 - Alert your supervisor immediately in the event of a chemical spill.
 - Contain the spill as trained in Spill Response Procedure.
 - Review SDS to determine what actions to take, regarding disposal or accidental exposure, in the event of a spill.

III. Procedure

- a) All chemicals should be handled with common sense and caution to avoid emergency situations.
- b) As part of our emergency response program, all employees who are required to use or handle chemicals will be used will be trained in this procedure, and more importantly on the specific spill response instructions outlined on the Safety Data Sheet.

General spill response procedure:

c) Handling Minor Spills

Defined as quantities of chemicals that can easily be cleaned up and pose no risk to a worker due to exposure or exceeding legislated exposure value limits.

- (i) Before attempting to clean up a small spill be certain that the material is uncontaminated. If there is any sign that a reaction has begun (bubbling, smoking, burning, hissing) evacuate the area and contact your supervisor immediately for assistance.
- (ii) Refer to the Safety Data Sheet and ensure the appropriate protective equipment is worn and available.

- (iii) To clean up a spill, use a clean broom and shovel or an absorbent cloth.
- (iv) Have a container or a clean plastic bag to place soiled materials into.
- (v) After placing the spilled material in the bag, seal it and label the bag to reflect the contents. Refer to SDS for proper disposal requirements.
- (vi) Thoroughly wash and dry any brooms, shovels or other equipment used in the cleanup.
- (vii) Inform supervisor cleanup is completed.

d) Handling Major Spills

If there is **NO danger of fire** and the spill is dry and uncontaminated follow these steps:

- (i) Have unneeded personnel leave the immediate area.
- (ii) Provide ventilation to area if required (flammable or toxic vapours).
- (iii) Mark off the area and make sure no foreign material or unnecessary staff enters.
- (iv) Obtain protective clothing and equipment as per SDS.
- (v) Get clean strong plastic contractor bags for holding the spilled material and/or the leaking containers and clean brooms and or shovels for picking up the spilled material.
- (vi) Be sure there is a clear, unobstructed route from the spill area to the outside of the building.
- (vii) After clean-up, tie the bag and label properly and identify the contents.
- (viii) Remove the bag(s) to an isolated area outside and keep from getting wet.
- (ix) Get instructions from SDS for safe and proper disposal of the material.
- (x) Thoroughly wash off and dry any brooms, shovels or other equipment used in the cleanup.

IV. Distribution

- a) A copy of this procedure will be available in the Site Safety Plan.
- b) Upon request, copies of this procedure will be made available to Subcontractors/Contractors.

V. Reference Documents

- N/A**

11.8 Emergency Equipment

I. Purpose

To ensure adequate emergency equipment is available at all ROSSCLAIR workplaces and compliance with Ontario's Fire Code.

II. Responsibilities

- a) Senior Management are responsible for ensuring:
 - A complete list of emergency equipment exists for the following:
 - Fire extinguishers
 - Eye wash stations
 - Fire exits and emergency lighting
 - Alarm systems
 - Installed fire safety equipment is inspected as per Fire Code requirements
 - Supervisors and workers are trained in location, safe use and inspection and review requirements.
 - Installed equipment adheres to Building and Fire Codes, and any municipal or relevant legislation.
- b) Project Managers and Site Supervisors are responsible for:
 - Training workers on the location of and use of emergency equipment.
 - Ensure emergency plan for the area has been tested and proven effective.
- c) Employees are required to:
 - Know the location of emergency equipment.
 - Identify the location of the nearest egress route and assembly area.
 - Participate in fire safety training as identified by the employer.

III. Procedure

- a) At the beginning of each project the Health and Safety Representative will deliver the emergency equipment listed below to the project site.
 - Fire extinguisher, ABC Class
 - Emergency Personal Eyewash
 - First Aid Kit
- b) The Site Supervisor is responsible for inspecting this equipment monthly and recording any deficiencies on the Weekly Supervisor Inspection Checklist.
- c) The Health and Safety Program Coordinator and the JHSC will review the emergency equipment in the workplace on a quarterly basis. The results of the review will be

documented and distributed to the members of the JHSC for review. The Committee Co-Chairs will include the review as an item to be included on the Committee agenda for discussion. This review will consist of the following:

- Correct selection of equipment
- Adequate number of equipment
- Appropriate location of equipment
- Training requirements for emergency equipment users
- Checks, inspections, replacement and/or calibration requirements.

IV. Distribution

- a) A copy of this procedure will be available in the Site Safety Plan.
- b) Upon request, copies of this procedure will be made available to Subcontractors/Contractors.

V. Reference Documents

- Emergency Equipment List

Element 12 Statistics and Records

12.1 Statistics and Records Policy

I. Purpose

Maintaining current health and safety statistics and records are essential as many are necessary to fulfill legal and health and safety program requirements. This document is meant to:

- a) Provide a guideline for monitoring the performance of the health and safety program by measuring the effectiveness of the program following the continual improvement system.
- b) Establish a process for developing and capturing leading and lagging Health and Safety indicators for statistical analysis and continual improvement. These indicators can include, but are not restricted to:

Leading indicators:

- o Near miss reports
- o First aid treatment records
- o Weekly inspection reports

- o JHAs

Lagging indicators:

- o Medical aid incidents
- o Time loss incidents
- o MOL Work Orders

II. Responsibilities

- a) Senior Management is responsible for:
 - Provide guidelines for capturing trend analysis by the Site Supervisor with review by the Project Manager monthly.
 - Conducting Management Review on a quarterly basis
 - Maintaining records of orientation, project inspections, safety audits, MOL reports and follow up actions.
 - Monitoring injury frequency rates and compiling an annual report on all health and safety activities and occurrences on a project.
 - Ensuring follow up is performed for all action items.
 - Analyzing statistics to determine health and safety objectives and targets for the year.
 - Providing the Joint Health and Safety Committee with copies of injury summary reports and ROSSCLAIR's incident rating.
- b) Project Managers and Site Supervisors are responsible for:
 - Maintaining records of orientation, project inspections, safety audits, MOL reports and follow up actions.
 - Collecting health and safety information as required and ensuring Subcontractors provide required information related to capturing trend analysis at each of the respective project sites.
 - Implementing corrective actions as assigned and following up on procedures to prevent subsequent occurrences.

- Performing weekly workplace inspections and forwarding to Senior Management.
 - Monitoring Subcontractors/Contractors to ensure Daily JHAs completion
 - Posting of the monthly project site specific trend analysis on the health & safety board.
 - Maintaining records associated with the jobsite and forwarding all relevant health and safety information to the head office upon completion.
- c) Joint Health and Safety Committee and Health and Safety Representatives is responsible for:
- Providing health and safety statistics to Senior Management.
 - Supporting to Site Supervisor to implement corrective actions.
 - Review Trend Analysis Reports on KPI results and propose corrective actions to address gaps against defined targets.
 - Verifies implementation of corrective action and follows up to its determine effectiveness
 - Reviewing received reports from the Workplace Safety and Insurance Board on ROSSCLAIR's incident rating (Workplace Injury Summary Report).
- d) All workers are responsible for reporting to their supervisor:
- Accidents,
 - Incidents,
 - First aid occurrences,
 - Lost time injuries,
 - Equipment damage
 - Unidentified hazards in the workplace

III. Procedure

- a) Reviewing records and accident and incident injury statistics provides a systematic means for capturing and identifying health and safety trends, in addition to deficiencies within the health and safety program.
1. Trend Analysis
 - Includes an ongoing record of defined aspects captured from project sites.
 2. Man Hours
 - Site Supervisor obtains a headcount daily, totals will be assigned per trade to generate a total for man hours.
 - Obtain the number of workers per trade and total hours worked monthly.
 - The total hours will be a base used to capture severity rates.
 3. Frequency and Severity
 - The use of the trend analysis form will reflect accountability and review goals and improvement.
 - The following formulas will be used to calculate overall incident rate, frequency and severity:

Injury severity rate = (# of work days lost + light duty days lost) x 200,000 / total hrs worked

*Lost Time Frequency = (# of Lost Time Accidents * 200000 / total hrs worked)*

*OHSA Reportable Incident Rate = (# of Accidents * 200000 / total hrs worked)*

*Lost Time Severity = (200000 / Work hours * Lost Work days)*

*No Lost Time Injury Frequency = (# of No Lost Time Injury Claims * 200000 / total hrs worked)*

- b) Annual internal and periodic external audits are a means of analyzing the overall effectiveness of the health and safety program and its degree of implementation.
- c) Monitoring our recordable accidents with the Workplace Safety and Insurance Board tracks our injury rating and can be used to identify trends in health and safety performance.
- d) The statistical analysis of our health and safety performance and degree of implementation of our health and safety program identifies both our success and our areas of weakness that requires improvement.
- e) Developing Health and Safety Action Plans for identified deficiencies. Tracking and monitoring progress and effectiveness of implemented corrective actions.
- f) The Joint Health and Safety Committee will review the trends analysis for each job site and make recommendations on how to improve the overall health and safety during the JHSC Meeting.

IV. Distribution

- a) A copy of this procedure is in the ROSSCLAIR Health and Safety Manual.
- b) Posting monthly project site-specific and trend analysis reports on the health and safety communication board

V. Reference Documents

- ROSSCLAIR Health & Safety Trends Analysis

Element 13 Legislated Requirements

13.1 Legislated Duties and Responsibilities

I. Purpose

This procedure outlines the Internal Responsibility System (IRS), which is the premise behind the Occupational Health and Safety Act (OHSA).

II. Responsibilities

- a) Duties of the Constructor, as per OHSA s. 23:
 - (1) A constructor shall ensure, on a project undertaken by the constructor that,
 - (a) the measures and procedures prescribed by this Act and the regulations are carried out on the project;
 - (b) every employer and every worker performing work on the project complies with this Act and the regulations; and
 - (c) the health and safety of workers on the project is protected.
 - (2) Where so prescribed, a constructor shall, before commencing any work on a project, give to a Director notice in writing of the project containing such information as may be prescribed.
- b) Duties of Employers, as per OHSA s. 25.
 - (1) An employer shall ensure that,
 - (a) the equipment, materials and protective devices as prescribed are provided;
 - (b) the equipment, materials and protective devices provided by the employer are maintained in good condition;
 - (c) the measures and procedures prescribed are carried out in the workplace;
 - (d) the equipment, materials and protective devices provided by the employer are used as prescribed; and
 - (e) a floor, roof, wall, pillar, support or other part of a workplace is capable of supporting all loads to which it may be subjected without causing the materials therein to be stressed beyond the allowable unit stresses established under the *Building Code Act*.
 - (2) Without limiting the strict duty imposed by subsection (1), an employer shall,
 - (a) provide information, instruction and supervision to a worker to protect the health or safety of the worker;
 - (b) in a medical emergency for the purpose of diagnosis or treatment, provide, upon request, information in the possession of the employer, including confidential business information, to a legally qualified

- medical practitioner and to such other persons as may be prescribed;
- (c) when appointing a supervisor, appoint a competent person;
 - (d) acquaint a worker or a person in authority over a worker with any hazard in the work and in the handling, storage, use, disposal and transport of any article, device, equipment or a biological, chemical or physical agent;
 - (e) afford assistance and co-operation to a committee and a health and safety representative in the carrying out by the committee and the health and safety representative of any of their functions;
 - (f) only employ in or about a workplace a person over such age as may be prescribed;
 - (g) not knowingly permit a person who is under such age as may be prescribed to be in or about a workplace;
 - (h) take every precaution reasonable in the circumstances for the protection of a worker;
 - (i) post, in the workplace, a copy of this Act and any explanatory material prepared by the Ministry, both in English and the majority language of the workplace, outlining the rights, responsibilities and duties of workers;
 - (j) prepare and review at least annually a written occupational health and safety policy and develop and maintain a program to implement that policy;
 - (k) post at a conspicuous location in the workplace a copy of the occupational health and safety policy;
 - (l) provide to the committee or to a health and safety representative the results of a report respecting occupational health and safety that is in the employer's possession and, if that report is in writing, a copy of the portions of the report that concern occupational health and safety; and
 - (m) advise workers of the results of a report referred to in clause (l) and, if the report is in writing, make available to them on request copies of the portions of the report that concern occupational health and safety.
 - (n) notify a Director if a committee or a health and safety representative, if any, has identified potential structural inadequacies of a building, structure, or any part thereof, or any other part of a workplace, whether temporary or permanent, as a source of danger or hazard to workers.
- (3) For the purposes of clause (2) (c), an employer may appoint himself or herself as a supervisor where the employer is a competent person.
- (4) (3.1) Any explanatory material referred to under clause (2) (i) may be

published as part of the poster required under section 2 of the Employment Standards Act, 2000.

- (5) Clause (2) (j) does not apply with respect to a workplace at which five or fewer workers are regularly employed.
- (6) Clause (2) (n) does not apply to an employer that owns the workplace.

c) Additional Duties of Employers, as per OHS s.26.

- (2) In addition to the duties imposed by section 25, an employer shall,
 - (a) establish an occupational health service for workers as prescribed;
 - (b) where an occupational health service is established as prescribed, maintain the same according to the standards prescribed;
 - (c) keep and maintain accurate records of the handling, storage, use and disposal of biological, chemical or physical agents as prescribed;
 - (d) accurately keep and maintain and make available to the worker affected such records of the exposure of a worker to biological, chemical or physical agents as may be prescribed;
 - (e) notify a Director of the use or introduction into a workplace of such biological, chemical or physical agents as may be prescribed;
 - (f) monitor at such time or times or at such interval or intervals the levels of biological, chemical or physical agents in a workplace and keep and post accurate records thereof as prescribed;
 - (g) comply with a standard limiting the exposure of a worker to biological, chemical or physical agents as prescribed;
 - (h) establish a medical surveillance program for the benefit of workers as prescribed;
 - (i) provide for safety-related medical examinations and tests for workers as prescribed;
 - (j) where so prescribed, only permit a worker to work or be in a workplace who has undergone such medical examinations, tests or x-rays as prescribed and who is found to be physically fit to do the work in the workplace;
 - (k) where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for the protection of a worker; and
 - (l) carry out such training programs for workers, supervisors and committee members as may be prescribed

- d) Senior Management shall:
- Designate a Health and Safety Program coordinator.
 - Support and provide the necessary resources to ensure the Health and Safety Program Coordinator is successful.
- e) Duties of Supervisors, as per OHS Act s. 27:
- (1) A supervisor shall ensure that a worker,
- (a) works in the manner and with the protective devices, measures and procedures required by this Act and the regulations; and
 - (b) uses or wears the equipment, protective devices or clothing that the worker's employer requires to be used or worn.
- (2) Without limiting the duty imposed by subsection (1), a supervisor shall,
- (a) advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which the supervisor is aware;
 - (b) where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker; and
 - (c) take every precaution reasonable in the circumstances for the protection of a worker.
- f) All supervisors shall:
- Enforce all health and safety rules, safe work practices and procedures with workers under their direct supervision and maintain responsibility for on-site accident prevention.
 - Conduct workplace inspections and encourage the reporting of hazards.
 - Provide workers with the necessary information and training to work safely with the identified hazards.
 - Monitor the health and safety performance of their workers and subcontractors, while providing adequate supervision to any visitors.
 - Perform the initial investigation of incidents and accidents. Document findings and report to management as required by the program and regulations.
 - Aid in accident investigations and take actions to prevent recurrence.
 - Obtain and submit all training and safety documentation to the constructor or MOL promptly and maintain on-site documents and materials as required.
 - Provide and enforce corrective actions for violations of the company's safety policies or procedures.

- Consult and co-operate with the Health and Safety Representative where appropriate.
- g) Duties of Workers, as per OHSA s.28
- (1) A worker shall,
- (a) work in compliance with the provisions of this Act and the regulations;
 - (b) use or wear the equipment, protective devices or clothing that the worker's employer requires to be used or worn;
 - (c) report to his or her employer or supervisor the absence of or defect in any equipment or protective device of which the worker is aware and which may endanger himself, herself or another worker; and
 - (d) report to his or her employer or supervisor any contravention of this Act or the regulations or the existence of any hazard of which he or she knows.
- (2) No worker shall,
- (a) remove or make ineffective any protective device required by the regulations or by his or her employer, without providing an adequate temporary protective device and when the need for removing or making ineffective the protective device has ceased, the protective device shall be replaced immediately;
 - (b) use or operate any equipment, machine, device or thing or work in a manner that may endanger himself, herself or any other worker; or
 - (c) engage in any prank, contest, feat of strength, unnecessary running or rough and boisterous conduct.
- h) All Workers shall:
- Maintain an acceptable mental and physical health and attitude for optimum work performance.
 - Know, understand and use established health and safety rules, practices and procedures for performing work in a safe manner.
 - Report to the supervisor any abnormal condition in the workplace (lighting, equipment, floor, guards, etc.), and take all necessary steps to prevent accidents from occurring while the defects are being reviewed or repaired.
 - Carry out repairs, alterations and process change only when authorized to do so.
 - Keep the workplace clean, orderly and safe.
 - No matter how minor, report all accidents, injuries and unusual conditions immediately to the supervisor.
- i) Duties of Owners, as per OHSA s.29.

- (1) The owner of a workplace that is not a project shall,
 - (a) ensure that,
 - (i) such facilities as are prescribed are provided,
 - (ii) any facilities prescribed to be provided are maintained as prescribed,
 - (iii) the workplace complies with the regulations, and
 - (iv) no workplace is constructed, developed, reconstructed, altered or added to except in compliance with this Act and the regulations; and
 - (b) where so prescribed, furnish to a Director any drawings, plans or specifications of any workplace as prescribed.

...

- (3) Where so prescribed, an owner or employer shall,
 - (a) not begin any construction, development, reconstruction, alteration, addition or installation to or in a workplace until the drawings, layout and specifications thereof and any alterations thereto have been filed with the Ministry for review by an engineer of the Ministry for compliance with this Act and the regulations; and
 - (b) keep a copy of the drawings as reviewed in a convenient location at or near the workplace and such drawings shall be produced by the owner or employer upon the request of an inspector for his or her examination and inspection.

...

- j) Duties of Project Owners, as per OHS s.30.
 - (1) Before beginning a project, the owner shall determine whether any designated substances are present at the project site and shall prepare a list of all designated substances that are present at the site.
 - (2) If any work on a project is tendered, the person issuing the tenders shall include, as part of the tendering information, a copy of the list referred to in subsection (1).
 - (3) An owner shall ensure that a prospective constructor of a project on the owner's property has received a copy of the list referred to in subsection (1) before entering into a binding contract with the constructor.
 - (4) The constructor for a project shall ensure that each prospective contractor and subcontractor for the project has received a copy of the list referred to in subsection (1) before the prospective contractor or subcontractor enters into a binding contract for the supply of work on the project.
 - (5) An owner who fails to comply with this section is liable to the constructor and every contractor and subcontractor who suffers any loss or damages as the result of the subsequent discovery on the project of a designated

substance that the owner ought reasonably to have known of but that was not on the list prepared under subsection (1).

- (6) A constructor who fails to comply with this section is liable to every contractor and subcontractor who suffers any loss or damages as the result of the subsequent discovery on the project of a designated substance that was on the list prepared under subsection (1).
- k) Duties of Suppliers, as per OHSA s.31.
 - (1) Every person who supplies any machine, device, tool or equipment under any rental, leasing or similar arrangement for use in or about a workplace shall ensure,
 - (a) that the machine, device, tool or equipment is in good condition;
 - (b) that the machine, device, tool or equipment complies with this Act and the regulations; and
 - (c) if it is the person's responsibility under the rental, leasing or similar arrangement to do so, that the machine, device, tool or equipment is maintained in good condition.
- l) Duties of Architects and engineers, as per OHSA s. 31
 - (2) An architect as defined in the Architects Act, and a professional engineer as defined in the Professional Engineers Act, contravenes this Act if, as a result of his or her advice that is given or his or her certification required under this Act that is made negligently or incompetently, a worker is endangered.
- m) Duties of directors and officers of a corporation, as per OHSA s.32.

Every director and every officer of a corporation shall take all reasonable care to ensure that the corporation complies with,

 - (a) this Act and the regulations;
 - (b) orders and requirements of inspectors and Directors; and
 - (c) orders of the Minister.

III. Definitions

- a) *Constructor*: means a person who undertakes a project for an owner and includes an owner who undertakes all or part of a project by himself or by more than one employer.
- b) *Employer*: a person (or company) who employs one or more workers or contracts for the services of one or more workers and includes a contractor or subcontractor who performs work or supplies services and a contractor or subcontractor who undertakes with an owner, constructor, contractor or subcontractor to perform work or supply services;
- c) *Supervisor*: means a person who has charge of a work place or authority over a worker;
- d) *Worker*: means any of the following, but does not include an inmate of a

correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program:

- (1) A person who performs work or supplies services for monetary compensation.
- (2) A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- (3) A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- (4) REPEALED: 2017, c. 22, Sched. 1, s. 71 (2).
- (5) Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation;

IV. Procedure

- a) Employees, within all levels of the organization, are accountable for health and safety. Health and safety duties are not an addition to an employee's job. It is an integral part of that job—a full-time component of everyone's responsibilities.
- b) Additionally, they must advise their direct Supervisor or manager when they lack ability and/or knowledge to perform requested tasks in a safe manner.
- c) All supervisors and managers must ensure that all documentation required to demonstrate both ROSSCLAIR's and their own respective due diligence, as specified in procedures found within this Health and Safety Manual, are completed, maintained and forwarded for record retention.
- d) The self-governance for health and safety as intended by the IRS is created by an overlapping set of responsibilities and duties for all workplace parties, which are found in Part II of the Occupational Health and Safety Act and are described below. These duties are not inclusive, there are additional duties that are prescribed in the Act and in associated regulations which are described in the applicable section of this manual.
- e) Legislation associated with our jobsites are identified during Construction Hazard Analysis.
- f) The Project Manager is to review applicable legislation during planning stages and in identifying routine work tasks.

V. Distribution

- a) All employees will be required to read and sign off on the company's "Employee Safety Manual" during the first week of hire.
- b) Every site supervisor will be provided with a printed version of our health and

safety program that will remain onsite in a convenient location where it may serve as a quick reference to the company's policies and procedures.

- c) The applicable portions of this manual will be reviewed with Subcontractors and Suppliers as part of the Subcontractor Safety Package.
- d) Additional methods of communicating the Legislated Duties and Responsibilities includes:
 - Safety Talks and Toolbox Talks
 - Payroll email

VI. Reference Documents

- N/A

13.2 Responsibilities of the Health and Safety Program Coordinator

I. Purpose

As part of the “*Internal Responsibility System*” ROSSCLAIR will appoint a Program Coordinator who will report directly to the Director of Finance & Admin to oversee the implementation of our Health and Safety Program. This appointee will serve as the employers Health and Safety Representative in the workplace.

II. Responsibilities

Senior Management shall ensure that:

- This procedure is implemented and adhered to on all job sites.
- The resources and training have been provided to personnel to do the work safely.

III. Procedure

The Health and Safety Program Coordinator is responsible for the following:

- a) Be a Health and Safety Ambassador and communicate the importance of health and safety to all ROSSCLAIR employees.
- b) Assist in the on-going development, maintenance and implementation of the current Health and Safety Program.
- c) Offer feedback and suggestions on how to continually improve and achieve our health and safety objectives and targets.
- d) Assist Senior Management in establishing a health and safety budget.
- e) Identify health and safety needs through on-going observation, statistical analysis, and employee input.
- f) Act as a liaison with regulatory agencies such as the WSIB, Ministry of Labour or the Ministry of the Environment.
- g) Monitor the program for regulatory compliance and effectiveness during regular workplace inspections.
- h) Verify the effectiveness of the ROSSCLAIR Early and Safe Return to Work Program.
- i) Participate in all accident investigations and report directly to the Senior Management the results of the investigation and make recommendations on the corrective actions needed.
- j) Maintain Documentation on all health and safety activities and initiatives.
- k) Maintain an awareness of the trends and developments in occupational health and safety including legislative changes.

IV. Distribution

- a) Senior Management will communicate the activities of the Health and Safety Program Coordinator to all ROSSCLAIR employees via email, postings, barbeques, and payroll mailouts.

V. Reference Documents

- N/a

13.3 Performance Evaluation and the Performance Improvement Plan (Discipline Policy)

I. Purpose

- a) To establish a standard to assess the progression and performance of workers in carrying out their assigned duties and responsibilities as legislated and as defined in their job descriptions.
- b) To have a tool to establish goals and objectives for improvement or development.
- c) A positive approach to progressive discipline is designed to enable management and employees to ensure that when performance issues are identified, corrective action is taken quickly, consistently and appropriately to resolve the situation in the best interests of ROSSCLAIR and the employee.
- d) The management has implemented a progressive disciplinary practice and procedure that takes into consideration that a worker may not have been properly advised of health and safety standards and therefore is not entirely at fault. Thus, the procedures allow adequate opportunity for any worker to alter their behavior and to personally demonstrate a willingness to change.
- e) Outline a standard progressive discipline process for managers and supervisors to follow in the event any worker is found to be working in an unsafe manner or in direct violation of a company policy or regulation

II. Responsibilities

- a) Senior Management has a responsibility to ensure that:
 - The Health and Safety Policy and associated Program are implemented and being met. In doing so, the management will regularly communicate performance expectations with workers, and confirm that the consequences of non-compliance are understood.
 - Guidelines for disciplinary action are developed and that Managers and Supervisors understand and follow these guidelines.
 - New employees are made aware of safety rules, and fairly and respectfully applying progressive discipline to all employees
- b) Project Managers and Site Supervisors are responsible for:
 - Training, counseling, and coaching employees to understand the expectations of ROSSCLAIR and the improvements that are necessary to achieve the desired level of performance and/or behaviour.
 - Consistent enforcement of policies and practices, including those related to health and safety, when there has been a violation
 - Conducting performance appraisals for direct reports in a timely manner.
- c) Employees are responsible for following company safety rules and exercising care and caution in the performance of their work.

III. Procedure

Performance Evaluation

- a) Senior Management will develop a performance assessment plan for all positions in the company. These performance assessment plans are designed to provide feedback to employees on their:
 - performance or progression regarding their responsibilities and duties under the Occupational Health and Safety Act and their job descriptions,
 - identify areas of acceptable competency, and
 - set goals in those areas that require improvement
 - Ensure that all workplace parties are evaluated annually.
- b) General job descriptions are developed for positions in ROSSCLAIR with the assistance of the assigned supervisor or manager and or designate. These descriptions include:
 - Title of position
 - Who the position reports to
 - Specific responsibilities and duties required by the OHS Act, and
 - Summary of primary job responsibilities and expectations
 - Defining qualifications of the position
- c) Senior Management are responsible for performing annual evaluations of managers and supervisors. These evaluations are performed within one month of the employees hiring anniversary date and are to be recorded on the Performance Appraisal Form (Manager/Supervisor/Worker). This review will include, but not limited to assessing the supervisor or manager's ability to:
 - perform new employee orientation and safety training in a timely manner,
 - conduct employee-training and information sessions
 - ensure workers are completing pre-use inspections
 - enforcing health and safety rules, work practices and procedures
 - complete inspection reports and recommendations received by the JHSC/HSR.
 - perform accident investigations for all work-related illnesses and injuries.
 - participate in Job Hazard Assessments and make recommendations for improvements to health and safety in the workplace
 - respond to, report and correct unsafe acts and conditions that may pose a hazard to a worker
 - perform employee safety observations and initiate the progressive discipline process when required.

- conduct employee information sessions. (Safety talks, staff meetings, tail gate meetings)
 - conduct accident investigations when required and in a timely manner, completing the report on the required form
 - work with the HSR/JHSC and workers to safely and diplomatically handle work refusals and work stoppages
 - professional development
- d) Supervisors are responsible for performing annual evaluations of their direct reports. These evaluations are performed within one month of the employees hiring anniversary date and are to be recorded on the Worker Performance Appraisal Form. This review will include, but not limited to the assessing the workers ability to:
- report hazards and make recommendations
 - adhere to health and safety rules, work practices and procedures; including wear the prescribed personal protective equipment
 - participate in accident investigations and workplace inspections
 - attend information and training sessions
 - achieve goals outline from previous performance appraisal
 - implement corrective actions identified in any disciplinary actions
- e) All employees are required to participate in their annual performance evaluation.

Progressive Discipline Process

- a) Progressive discipline is a system of escalating responses that are meant to correct negative behavior. The steps of progressive discipline include:
1. Counseling or a verbal warning;
 2. A written warning;
 3. Suspension or demotion; and
 4. Termination.

The stage chosen for any given infraction is dependent on a variety of factors, including the severity of the infraction, the previous work history of the employee and the impact of the decision on others in the organization.

- b) Each step will be documented, and the original document will be retained in employee's file. A copy of any disciplinary action will be given to the employee and retained by the Manager for future follow up.
- c) Discipline may be administered at any time when an incident or developing pattern of behaviour creates a serious concern. Discipline may be administered in the form of informal counseling or formal discipline. Any informal counseling or formal discipline shall be administered as soon as possible (within 24 hours) after the facts giving rise to the discipline become known to the manager.
- d) **Informal counseling** — When an incident occurs that warrants informal counseling

under this policy, the employee's immediate supervisor shall bring the incident to the employee's attention. The supervisor and the employee should discuss the concerns and agree on a corrective action plan, if necessary. The supervisor is expected to follow-up with the employee to ensure the corrective action plan is effective and the desired results are achieved. If the desired changes or results are not achieved after a reasonable period of time, then a formal discipline step may be implemented

- e) All disciplinary action, besides step 4, will include a mandatory safety talk that addresses the violation and includes the next disciplinary steps to be taken should the behaviour or actions not be corrected.
- f) ***Any employee who willfully violates any Company Policies and/ or legislative requirements will be subject to progressive disciplinary action. ROSSCLAIR reserves the right to escalate the disciplinary action taken for a single infraction based on the severity of the infraction.***

Guidelines

- *A mandatory suspension* will be issued when it is the opinion of the supervisor that the violation is major in nature and will directly endanger the health and safety of any person at the workplace, or it is a repeat violation. Possible suspension of the worker will be for a period of one (1) to five (5) depending on the severity and nature of the violation.
- *Mandatory termination* will be issued where, it is the opinion of the supervisor that the violation was life threatening to one or more individuals at the workplace or there is a repeat violation.

g) **Record Keeping**

- (1) Accurate records of disciplinary measures taken against workers for health and safety infractions will be kept in the individual's personnel file. In the case of a verbal warning the infraction will be noted and kept for a period of three (3) years.
- (2) Written documentation will include the following information:
 - Date and time of infraction
 - Type of infraction
 - Number of previous warnings issued to worker
 - Action taken by management
 - Name of person initiating the discipline and general comments.

IV. Distribution

- a) All employees will review and sign respective job descriptions which outline specific job expectations at point of hire, or transfer.
- b) The performance appraisal and progressive discipline process will be discussed during the new employee orientation.
- c) A copy of this procedure will be available in the ROSSCLAIR Health and Safety Manual which will be accessible to all workers at both worksites and head office locations.

- d) A copy of the annual Performance Appraisals will be given to the evaluated employee and the original copy shall be placed in the employee's HR file.

V. Reference Document

- Management Performance Appraisal Form
- Supervisor Performance Appraisal Form
- Worker Performance Appraisal Form
- Safety Counseling Form

13.4 The Right to Refuse Unsafe Work

I. Purpose

The **Occupational Health and Safety Act** gives a worker the right to refuse work that they believe is unsafe, this procedure sets out the steps to be followed in a work refusal.

II. Responsibilities

- a) Senior Management shall ensure that:
 - This procedure is implemented and adhered to on all job sites.
 - The resources and training have been provided to personnel to do the work safely.
- b) Project Managers and Site Supervisors shall:
 - Provide workers with training, counseling, and coaching employees
 - Perform weekly inspections to continually identify hazards and implement controls to protect workers
 - Take every precaution reasonable in the protection of a worker.
- c) Workers shall report any unsafe act, condition or thing to their supervisor immediately.

III. Procedure

- a) If a worker is unsure, unfamiliar or concerned about any task, the worker must notify their supervisor and allow the supervisor an opportunity, under the Internal Responsibility System, correct the issue.
- b) Work Refusal Process Stage 1: The worker notifies their Supervisor that they are refusing to do work as it is believed to be unsafe (**Section 43(4)**).
- c) The Supervisor must investigate the situation immediately, in the presence of the worker and one of the following:
 - A Joint Health and Safety Committee member who represents workers, if there is one. If possible, this should be a certified member; or
 - A Health and Safety Representative, in workplaces where there is no Joint Health and Safety Committee; or
 - Another worker, who, because of knowledge, experience and training, has been chosen by the workers to represent them. The refusing worker must remain in a safe place near the workstation until the investigation is completed (**Section 43(5)**). This interval is known as the 'first stage' of a work refusal.

The results of Stage 1 must be recorded on the Work Refusal Form. If the situation is resolved at this point, the worker will return to work.

- d) Work Refusal Stage 2: If after Stage 1, the worker may continue the work refusal if they have reasonable grounds for believing that the work continues to be unsafe

(Section 43(6)).

*Note**: 'Reasonable grounds' for continuing to refuse means that the worker has some objective information that makes him or her believe the work is still unsafe. The worker does not have to be correct in his or her knowledge or belief. For example, other workers who have used an electrical piece of equipment that it sometimes sparks for no reason may have told the refusing worker.

- e) The worker, the employer or someone acting on behalf of either the worker or employer must notify a Ministry of Labour inspector. **(Section 43(6))**.
- f) While waiting for the inspector, the worker must remain in a safe place near the work station, unless the employer assigns some other reasonable work during normal working hours. If no such work exists, the employer can give other directions to the worker. **(Section 43(10))**.
 - While waiting for the inspector, the supervisor can ask another worker to do the work that was refused. The supervisor must advise the second worker that the work was refused and why. This must be done in the presence of a committee member who represents workers, or a Health and Safety Representative, or a worker representative chosen because of knowledge, experience and training **(Sections 43(11) and (12))**. The second worker has the same right to refuse as the first worker.
- g) The inspector must decide whether the work is likely to endanger the worker or another person. The inspector's decision must be given, in writing, to the worker, the employer, and the worker representative, if there is one. If the inspector finds that the work is not likely to endanger anyone, the refusing worker is expected to return to work **(Sections 43(8) and (9))**.
- h) A worker is deemed to be at work during the refusal process and is entitled to be paid at their appropriate rate. A person acting as a worker representative during a work refusal is paid at either the regular or the premium rate; whichever is applicable **(Section 43(13))**.
- i) A worker has the duty to work in accordance with the Act and the regulations and has the right to seek their enforcement. The employer is not allowed to penalize, dismiss, discipline, suspend or threaten to do any of these things to a worker who has obeyed the law (Section **50(1)**).
 - This also applies if a worker has given evidence at an inquest or a prosecution under the Act or the regulations.

However, this provision does not apply if the work refusal was made in bad faith, or if the worker continues to refuse after the Ministry of Labour inspector finds that the work is not likely to endanger the worker.

*Note***: Inspectors are permitted to resolve work refusals in consultation with workplace parties and without entering the workplace. **(Section 43(7) OHSA)**

IV. Distribution

- a) New employees and Subcontractors are trained on this procedure during orientation.
- b) A copy of the Work Refusal Flow Chart will be posted on our Health and Safety Board.
- c) Copies of this procedure are available in the Site Safety Plan.

V. Reference Documents

- Work Refusal Flow Chart
- Work Refusal Record Form

13.5 Posted Health and Safety Materials

I. Purpose

To identify the information required to be posted on our Health & Safety Communication Boards that are placed in a high traffic area of the workplace where most workers are likely to see them.

II. Responsibilities

- a) Senior Management shall ensure that:
 - This procedure is implemented and adhered to on all job sites.
 - The resources and training have been provided to personnel to do the work safely.
- b) Project Managers and Site Supervisors shall that all required postings are displayed in a conspicuous location on the Health & Safety Communication Board.
- c) The Health and Safety Program Coordinator or designate shall ensure that a package complete with the required postings is provided to the Project Manager for new projects.

III. Procedure

- a) Project Manager and Site Supervisor shall ensure that the following documents are posted on the health and safety boards at project sites.
 - If any item is missing the Site Supervisor is to mark the document as missing on the Jobsite Document Checklist and request for a copy from the Health and Safety Representative.
 1. A current copy of the Occupational Health and Safety Act and associated regulations and explanatory information:
 2. Corporate Health and Safety Policy Statement
 3. Workplace Violence and Harassment Policy Statement
 4. Early Return to Work Policy Statement
 5. MOL Posters
 6. WSIB Form 82 Posters
 7. WHMIS Poster
 8. First Aid Regulation 1101
 9. First Aid Certificates
 10. Emergency Response Numbers
 11. Emergency Response Plan information
 12. JHSC member names and latest minutes
 13. Site H&S Representative's names
- b) Supervisor and Health and Safety Representative will verify during site inspections that the required postings keep on the health and safety board for the duration of the project.

- c) The Joint Health and Safety Committee will ensure that the main health and safety board at the ROSSCLAIR head office.

IV. Distribution

- a) A copy of the required documents and the Jobsite Document List are provided in the Site Safety Plan.

V. Reference Documents

- Jobsite Document List

Element 14 Occupational Health

14.1 Occupational Health Policy

I. Purpose

- a) To ensure ROSSCLAIR's commitment to effectively ensure occupational health, safety and hygiene are initiated and maintained in the workplace to prevent occupational illness and injuries.
- b) Communicate & train workers with regards to Health Hazards, risk and applicable procedures to mitigate risk.
- c) Include health hazard identification as part of regular workplace inspections.
- d) Set and monitor standards for exposure controls.
- e) Eliminate health hazards at the source whenever possible.
- f) Ensure companywide compliance with WHMIS regulations.
- g) Ensure our subcontractors are aware of and comply with their requirements concerning occupational health hazards.

II. Roles and Responsibilities

- a) Senior Management is responsible for:
 - i. Ensuring that adequate hazards assessments are conducted to identify all occupational health hazards related to:
 - chemicals (solids, liquids, gases, and aerosols such as dust, mist, vapour, liquid, smoke, or fume),
 - physical hazards (heat, cold, noise, vibration, radiation),
 - biological agents (moulds, viruses, bee stings), and
 - ergonomic hazards (improper lifting, poor tool design, repetitive motion)
 - designated substances (lead, isocyanates, asbestos)
 - ii. Ensuring JHA are completed as aligned with Element 2 procedure for identifying and controlling occupational health hazards.
 - iii. Initiating and monitoring site-specific controls as determined by JHA by means of documentation of inspection.
 - iv. Completing the Summary Action Plan related to Element 14, when deficiencies are identified.
- b) Project Manager and/or Site Supervisor are responsible for:
 - i. Conducting Job Hazard Assessments (JHA) as required to identify potential occupational health hazards using the Job Hazard Assessment (JHA) form.
 - ii. Implementing corrective actions to minimize risk related to each hazard.
 - iii. Identifying controls and communicate hazard, risk and adequate control measures to workers.
 - iv. Monitoring and verifying the effectiveness of implemented controls.
 - v. Ensuring that there are adequate drinking water and washroom facilities available for all workers.
- c) Workers are responsible for

- i. Understanding, acknowledgement and compliance of ROSSCLAIR Health and Safety Policies and Procedures including site-specific requirements.
- ii. Complying with all applicable Occupational Health policies and procedures.

III. Procedure

- a) Hazard Assessments
 - Supervisor shall conduct an occupational health hazards as part of Element 2
 - Always implement controls according to the Hierarchy of Controls:
 - i. Elimination of the hazard
 - ii. Substitution
 - iii. Implementation of engineering controls to prevent exposure to the hazard.
 - iv. Implementation of procedural controls to prevent employees from reaching the hazard
 - v. Implementation of personal protective equipment to prevent exposure to employees
- b) Waste
 - All hazardous materials not used will be disposed of as per Federal and Provincial by-laws.
- c) Designated Substances
 - i. Worker exposure to Designated Substances must be controlled in accordance with Legislative requirements of O. Reg. 278/05.
 - ii. List of Designated Substances:
 - Acrylonitrile
 - Arsenic
 - Asbestos
 - Benzene
 - Coke oven emissions
 - Isocyanates
 - Lead
 - Mercury
 - Silica
 - Vinyl chloride
 - Ethylene oxide
 - iii. Use of subcontractor in means of performing activities necessary when handling (i.e. removal, abatement, disposal) any of the above designated substances in the area(s) of the project site where identified and participate in the minimum recommendations as required.
 - iv. Subcontractor will be required to provide ROSSCLAIR with a program and procedure specific for the project for review and awareness.
 - v. Posting of monitoring results if needed for Designated substances.
 - vi. When required under a control program that relate to the monitoring of airborne concentrations of a designated substance and worker exposure to airborne concentrations of a designated substance, the employer shall,
 - ✓ promptly post the results in a conspicuous place or places where they are most likely to come to the attention of workers who would be affected by them and leave them posted for no less than 14 days;

- ✓ provide a copy of the results to the joint health and safety committee; and
 - ✓ keep the results for no less than five years.
 - vii. Personal Protected Equipment
 - ✓ A worker who is exposed to any level of an airborne designated substance will be requested to wear any specified specialized personal protective equipment supplied from his or her employer.
 - ✓ An employer who provides a worker with specialized personal protective equipment shall ensure there is training and instruction to the worker in the care and use of this equipment.
 - viii. Discovery
 - ✓ In the event of discovery of any designated substance the worker shall notify the supervisor immediately. Inform all employees in the area to leave the area and follow first aid procedures, if necessary.
 - ✓ The supervisor will ensure barricading of the designated area (i.e. danger/red tape, locking area, danger signage) and engage an appropriate to conduct analysis to confirm the designated substance and recommendations.
 - ✓ It is Rochon Building Corporation's interest to have a subcontractor specialized in handling the substance at the project site, if determined to be of a designated substance.
- d) Confined Spaces
- i. JHA will be conducted, if confined space hazards are identified in the workplace then measures will be followed as part of Element 2.
 - ii. Methods from a subcontractor on a project site-specific which include verification of air quality prior to entry into confined spaces, entry permits, air and personnel monitoring while in confined spaces, ventilation, entry procedures, attendant, communication, PPE, safe retrieval, emergency rescue procedures, equipment and records, etc.
 - iii. Site-Specific Training Requirements in the procedures are required prior to conducting work in confined spaces.
 - iv. At least two employees will be trained on confined space entry if such hazard exists.
- e) Toilet and Wash-Up Facilities
- i. Toilet facilities will be available on-site and will be operated in accordance with the applicable regulations and be maintained in a state of reasonable cleanliness.
 - ii. Adequate amount of toilet facilities is to be identified on the project site map, minimum number as per workers and structure requirements as per the Construction Regulations 213/91 (Project constructor will usually be responsible for this requirement, if Rochon Building Corporation is constructor then Rochon Building Corporation will provide facilities).
 - iii. Good hygiene practices must be strictly followed including prohibiting eating, drinking, and smoking in the work area; requiring washing of hands before eating, drinking, or smoking.
- f) Drinking Water

- i. A reasonable supply of potable drinking water shall be kept readily accessible at a project.
 - ii. All water (including ice) must be taken from federal, provincial and/or local health board approved sources; otherwise testing will be required to be conducted.
 - iii. Only one-use paper cups or individual/personal receptacles should be used as drinking containers and these must be stored in a clean location.
 - iv. Portable water dispensers should be tightly sealed (not open-topped) and have a tap.
- g) Annual review of procedure to identify any changes to the ROSSCLAIR Health and Safety Program; Revision Page will reflect the review and update.

IV. Distribution

- a) A copy of this procedure will be available in the Site Health and Safety Manual.

I. Referenced Documents

- Job Hazard Analysis

Element 15 First Aid

15.1 First Aid

I. Purpose

- c) To implement a first aid program in accordance with regulatory requirements.
- d) Ensure that there is a structured reporting system of first aid incidents.

II. Responsibilities

- a) Senior Management shall:
 - Ensure that there are qualified persons to provide first aid.
 - Support the necessary training to qualify persons.
 - Ensure that transportation of an injured employee to the nearest medical treatment facility is available when necessary
- b) The Project Manager and Site Supervisor shall ensure that:
 - First aid stations and qualified persons are present to provide first aid assistance to injured employees.
 - A WSIB's "In Case of Injury" poster (Form 82), is posted in the workplace.
 - First aid attendant's certificate is valid and posted at the first aid station. (Certification is valid for 3 years from date of completion).
 - First aid stations are being inspected as often as necessary, at minimum quarterly.
 - That transportation of an injured employee to the nearest medical treatment facility is available when necessary
 - All first aid incidents are reported and documented.
- c) All workers shall report to their immediate supervisor any incident that requires first aid treatment or incident reporting.
- d) Joint Health and Safety Committee and Health and Safety Representatives shall:
 - Monitor the first aid stations during site inspections to ensure that all the requirements of the First Aid Regulation 1101 are being met.
 - Provide recommendations when a deficiency in the system is noted.
 - Review First Aid Reports and make recommendations when required to reduce or eliminate similar recurrence.

III. Definitions

First Aid: A work related injury that is defined as "any one-time treatment of minor scratches, cuts, burns, splinters and so forth, which can be treated by a Certified First Aid Attendant."

IV. Methodology

- a) An appropriate number of employees will be provided with first aid training and certification from an approved training agency at ROSSCLAIR's expense.

- b) The first aid stations (boxes) will be provided as prescribed and maintained as prescribed in accordance with the requirements of the WSIA Regulation 1101.
- c) A copy of the WSIB first aid regulations will be posted on the Health and Safety Bulletin Board and at the first aid station.
- d) First Aid certificates will be posted on the Health and Safety Communication Board.
- e) The names, work locations and internal phone numbers of all certified first aid staff at the workplace shall be recorded on the Emergency Notification form.
- f) All first aid treated injuries will be reported and documented in our first aid logbook as required by our Health and Safety Program.
- g) First Aid stations will be stocked as required as per regulation 1101 and inspected as described in our workplace inspection program. All inspections will be documented on the First Aid Kit Contents Checklist.
- h) A response capability for transport to and from a medical facility or employee's home when required.

V. Procedure

- a) Employees must report any first aid incidents to their immediate Supervisor.
- b) Only a qualified First Aid Attendant can treat a first aid incident.
- c) The Supervisor must ensure that all employees are made aware of the locations of the first aid kits.
- d) The Certified First Aider must complete a "*First Aid Report*" each time that first aid treatment has been provided. See the end of this procedure for an example of a First Aid Report.
- e) The Project Manager, Supervisor and JHSC must ensure that all First Aid Reports are reviewed, and corrective action taken where necessary. All First Aid Reports must be kept on file for a period of at least 5 years.
- f) The Site Supervisor must send a copy of the First Aid Report to the JHSC for review at their next meeting.
- g) *Transportation of injured worker to medical facility*
 - i. The first method of transportation is an ambulance. Should this method of transportation not be appropriate then the company will call for a taxi, or a Supervisor will appoint a competent person to transport the injured worker, accompanied by the first aid attendant.
 - ii. Should the employee refuse the transportation, the company will attempt to:
 - Identify any other transportation methods the worker would prefer.
 - Reiterate the importance of accepting the transportation to the hospital, doctor's office, clinic or worker's home.
 - Call 911 and get the ambulance attendant to administer medical attention onsite.

- Contact the employee's emergency contact person for transportation assistance.
- The worker will not be permitted to continue work until medical clearance is provided

Should the injured worker wish to self-transport this will be documented on the First Aid Report and the Supervisor notified. The employee will be given instructions on reporting back to the employer on medical outcome.

- iii. The person traveling with the injured worker will continue to administer first aid as may be required, take the company injury package to the treating facility and keep the employer up to date as to the ongoing status of the injured worker.
- h) *A First Aid Station shall:*
- i. A first aid box containing the items required by Regulation; and a notice board displaying, the Board's poster known as Form 82, the valid first aid certificates of qualifications of the trained workers on duty, and an inspection card with spaces for recording the date of the most recent inspection of the first aid box and the signature of the person making the inspection.
 - ii. A first aid station shall be in the charge of a worker who works in the immediate vicinity of the first aid station and who is qualified in first aid to the standards required by this Regulation.
 - iii. First aid stations shall be located as to be easily accessible for the prompt treatment of any worker at all times work is in progress.
 - iv. A first aid box shall contain as a minimum the first aid items required by this Regulation and all items in the box shall be maintained in good condition at all times.
 - v. The box shall be large enough, so each item is in plain view and easily accessible.
 - vi. Every employer shall at all times keep posted in other conspicuous places in the places of employment the Board's poster know as Form 82 respecting the necessity of reporting all accidents and receiving first aid treatment.
 - vii. The expense of furnishing and maintaining first aid appliances and services shall be borne by the employer.
 - viii. Every employer shall keep a record of all circumstances respecting an accident as described by the injured worker, the date and time of its occurrence, the names of witnesses, the nature and exact location of the injuries to the worker and the date, time and nature of each first aid treatment given.
 - ix. Employers shall inspect first aid boxes and their contents at not less than quarter-yearly intervals and shall mark the inspection card for each box with the date of the most recent inspection and the signature of the person making the inspection.
 - x. The Board or its appointees may make inspections of first aid stations, appliances, services and records.

i) *First Aid Station Contents*

Every employer employing more than fifteen and less than 200 workers in any shift at a place of employment shall provide and maintain at the place of employment one stretcher, two blankets and a first aid station with a first aid box containing as a minimum,

- (a) a current edition of a standard St. John Ambulance First Aid Manual;
- (b) 24 safety pins;
- (c) 1 basin, preferably stainless steel; and
- (d) dressings consisting of,
 - (i) 48 adhesive dressings individually wrapped,
 - (ii) 2 rolls of adhesive tape, 1 inch wide,
 - (iii) 12 rolls of 1-inch gauze bandage,
 - (iv) 48 sterile gauze pads, 3 inches square
 - (v) 8 rolls of 2-inch gauze bandage,
 - (vi) 8 rolls of 4-inch gauze bandage,
 - (vii) 6 sterile surgical pads suitable for pressure dressings, individually wrapped,
 - (viii) 12 triangular bandages,
 - (ix) splints of assorted sizes, and
 - (x) 2 rolls of splint padding

VI. Distribution

- a) A copy of this document is available in the Site Safety Plan.
- b) A copy of this document is available to Subcontractors/Contractors upon request.

VII. Reference Documents

- First Aid Kit Content Inspection Checklist
- First Aid Report Log

Element 16 Joint Health and Safety Committee/Health and Safety Representatives

16.1 Joint Health and Safety Committee (Head Office)

I. Purpose

The formation of a Joint Health and Safety Committee and its ongoing activities is a benefit to all the employees and the workplace in general and is a requirement under **OHSA Legislation 9. (3)**:

- to provide an opportunity for all employees to participate in the health and safety aspects of the workplace,
- to identify and resolve workplace hazards through regular inspections and worker communications,
- to provide a resource for the company in the development, operation and implementation of the ongoing Health and Safety Program, as well as related programs,
- to gather and provide access to information allowing employees a better understanding of the Act, and a response to any health and safety concerns
- To create and maintain an active interest in health and safety to reduce accidents.
- To help stimulate an awareness of safety issues and an atmosphere of co-operation between Management and workers.

II. Responsibilities

b) Senior Management is responsible for ensuring that:

- a Joint Health and Safety Committee (JHSC) is formed, structured and functioning
- the names of the members are prominently posted in the workplace
- assistance and cooperation are provided to the JHSC
- Recommendations made by the JHSC are addressed, and formal recommendations are responded to within 21 days.
- The JHSC has access to pertinent resource such as:
 - ✓ Notification of injury or occupational disease.
 - ✓ Information on potentially hazardous materials/processes.
 - ✓ Reports on health and safety.
 - ✓ Health and safety statistics.

c) Certified Members shall

- Be present in any situation where a worker has refused work, or investigate complaints that dangerous circumstances exist.
- an initiate a bilateral work stoppage, and in some cases perform unilateral work stoppage.

d) Supervisors

- Ensure that representatives are allowed the required preparation time for the committee meetings, inspections and investigations (minimum 1 hour).
- Provide all necessary assistance to committee members in the performance of their duties.

b) The Joint Health and Safety Committee is responsible for:

- Attend all meetings and committee functions as work schedule permits
- Maintain confidentiality in areas involving medical information, company trade secrets, or as requested by employees
- Obtaining information from the employer on potential or existing hazards, accident data/trends, occupational disease, hygiene reports, etc.
- Assist in the development and review of the health and safety program.
- Perform workplace inspections as assigned.
- Receive and consider the H&S concerns or suggestions received from supervisors and workers. Always support the Internal Responsibility System; however, bring these concerns or suggestions to the next committee meeting for discussion.
- Performing accident investigations that identify the underlying root cause(s) and identifying corrective action to be taken.
- Reviewing accident/illness information and analyze for trends.
- Participate in work refusals.
- Make recommendations to the employer on improvements to the Health and Safety Program.
- Accompany a Ministry of Labour Inspector during a ministry inspection of the workplace.
- Keep current with respect to occupational health and safety issues, trends and advancements including changes in legislation.

b) The Secretary will be responsible for ensuring that

- All reports required by law or the safety program are provided to all members of the committee, along with the agenda for the next meeting.
- Arrange to have all employee members made available for Committee functions.
- Monitor the performance of the committee and this procedure, and recommend changes as appropriate to the committee
- Minutes of the JHSC meeting are recorded and posted on the Health & Safety Communication Board.

- The JHSC keeps to the set agenda during the JHSC meeting
- Files for all JHSC records and follow up on the status of all outstanding recommendations are maintained.
- Arrangements for the meeting, including booking a room and any other necessary logistics are handled.
- Members are provided with copies of the required materials.

III. Procedure

a) Committee Development

- The JHSC will represent employees from all aspects of the company, who have been elected or have volunteered to participate on the committee or have been selected by the trade union to represent the workers. No less than 50% will be worker representatives. The management representatives can be selected by the Employer.
- The workers on the JHSC will elect a co-chairperson to represent employees, and the management representatives will elect the management co-chairperson.
 - The co-chairperson's term of office will be for periods of twelve (12) months.
- The replacement of committee members must be staggered to ensure continuity. Nominations and elections will take place as required.

b) Policy Administration

- i. The JHSC will serve as an auditing and reporting body to monitor the effectiveness of the health and safety program. The committee will assist in promoting safety as the responsibility of all employees.
- ii. The functions of the JHSC may include the following but need not be limited to: Accident Investigations, Accident Reviews, develop Health and Safety awareness programs, identifying unsafe conditions, feedback on the effectiveness of safety management.
- iii. The JHSC will meet on a regular basis, at minimum quarterly. The JHSC will select the next meeting date at the end of each meeting.
- iv. The agenda for the meeting shall be prepared by the management co-chairpersons and will be distributed the day of the Joint Health and Safety meeting. The agenda shall include, but not limited to the following:
 - Outstanding items from previous minutes
 - New items identified in workplace inspections
 - Accident/Incident Investigation Report Review
 - Industrial Hygiene Results
 - New business

- v. The decisions of the committee will be made by consensus within governmental regulations.
- vi. Supervisors of Committee members will be provided with a schedule for Health and Safety Committee meetings and are expected to permit these members to attend and participate in the meeting and other assigned duties.
- vii. All members will abide by the confidentiality rules of the Act, concerning trade secrets or personal medical information they may receive during and after the course of their tenure.
- viii. All employees will be encouraged to discuss their concerns with their immediate supervisor before bringing it to the attention of the Committee.
- ix. Committee members will thoroughly investigate all complaints to get pertinent facts and will exchange these facts when searching for a resolution to a problem. All such problem resolutions will be recorded in the Minutes.
- x. Medical, personal or trade secret information will be kept confidential by all Committee members
- xi. All time spent in attendance at Committee meeting or in activities relating to the function of the Committee will be paid for at the member's current rate of pay for performing work, and the time spent shall be considered as time at work.
- xii. The Committee members are entitled to one (1) hour preparation time for each meeting.

c) *Structure of the Committee*

- i. The Committee shall consist of at least four (4) members; 1 member selected by the employer and 1 member selected by the workers. The member's term will be three (3) years. Alternates may be allowed; however, they shall only be used in an emergency and with the approval of the co-chairpersons. Each party will supply a list of one (1) alternate.
- ii. The Committee shall meet the **third Thursday every third month**. (changes will be approved by the co-chairpersons).
- iii. A co-chairperson may with the consent of his/her counterpart, invite any additional person(s) to attend the meeting to provide additional information and comment, but they shall not participate in the regular business of the meeting.
- iv. The co-chairperson will rotate the chairperson's position monthly.
- v. The workers will select one worker member and the employer will select one management member, to become certified by the Ministry of Labour. The certified members will exercise the designated duties of certified members.
- vi. The **Co-chairs** (a *worker* and a *management* member) will:
 - o Agree on an agenda one week prior to a monthly meeting and will rotate

the chairing of the meetings.

- Draft recommendation forms.
- Review and approve Committee Minutes for distribution.
- Act as the Chair for every second meeting.
- Conduct and guide the meetings to ensure that the committee fulfills its function as outlined by company policy and current legislation.
- Ensure that all Committee members have an opportunity to participate in discussions, decisions and recommendations during the meeting

d) Inspections

- i. The members of the Committee who represent workers shall designate one of the members representing workers to inspect the physical condition of the workplace, accompanied by a Management member of the Committee, on the **third Thursday of every month**. The workplace inspection shall be conducted prior to the quarterly committee meeting.
- ii. All health and safety concerns raised during the physical inspection will be recorded on an appropriate **Workplace Inspection Form** and signed by both members of the inspection team.
- iii. The Workplace Inspection Form will be forwarded to the Committee and to each area supervisor within two days of the inspection. The supervisor will inform the Committee of the status of the outstanding items before the next committee meeting.
- iv. The Certified Members will be the preferred inspection team.

e) Recommendations to the Employer

- i. Senior Management will communicate in writing directly to with the co-chairs with regards to received written Committee recommendations.
 - A list of action to be taken, persons responsible and an action timetable will accompany recommendations that are accepted.
 - Those that are rejected will be accompanied by a full explanation and an alternative control proposal.
- ii. Recommendations to Senior Management will be entered on the designated form, signed by both Co-chairs, and forwarded to Senior Management within three (3) days. Senior Management will review and provide a written response on this form, within twenty-one (21) days, who will provide copies to all Committee members and then post the form and the Minutes within one (1) day

f) Accidents and Accompaniment

- i. The Committee will designate members and alternates if required, chosen by those they represent, to investigate all serious workplace accidents, and

incidents that have the potential for a serious accident. The inspection team will be responsible for overseeing that the requirements prescribed in **Section 9. (30-31)** of the Occupational Health and Safety Act are followed. The Certified Member will be the preferred investigator.

- ii. The Committee will designate two members and / or alternates if required, chosen by those they represent, to accompany the Ministry of Labour while carrying out the Ministry inspection of the workplace.
- iii. The members of the Committee representing workers shall designate a member and or alternate if required, investigating work refusals. Senior Management and the Ministry of Labour will be informed in writing of the names of the workers so designated.
 - The Certified Member shall be the preferred worker counsel at work refusals.

g) Minutes of Meeting

- i. The Committee will designate a Secretary for the meeting to record the Minutes.
- ii. The minutes of the meeting will be typed, circulated and filed within three (3) working days of the meeting, or as the Committee may from time to time instruct.
- iii. Minutes of each meeting will be reviewed, and edited where necessary by the co-chairpersons, then signed and circulated to all Committee Members with a copy forwarded to senior management before any broader circulation takes place.
- iv. Agenda items will be identified by a reference number, allowing expedient access through a proper filing system.
- v. Names of Committee Members will not be used in the Minutes except to record attendance.
- vi. The corrective action required, the person responsible, and the target date for completion will be communicated through the minutes of the meeting for distribution to all those with responsibility for items listed.

h) Meeting Agenda

- i. The co-chairperson will prepare an agenda and forward a copy to all Committee members at least one (1) week in advance of the meeting.
- ii. The committee may accept any item as proper for discussion and resolution pertaining to health and safety, except to amend, alter, subtract from or add to, any terms of this Agreement. All items raised from the agenda in meetings will be dealt with on the basis of consensus rather than voting. Formal motions will not be used.
- iii. All items that are resolved and those that are not will be reported in the

Minutes. Unresolved items will be so recorded and placed on the agenda for the next meeting.

iv. The JHSC is to review a minimum of five (5) elements of the health and safety manual quarterly. By doing so, the entire program will be reviewed once annually. Any revisions done to the health and safety manual must be approved by a Senior Management or designate.

i) *Amendments to these Guidelines*

Any amendments, deletions or additions to these guidelines must have the consensus of the total committee and shall be set out in writing and attached as an Appendix to these guidelines.

j) Senior Management may assign tasks or specified activities to the Joint Health and Safety Committee based on new legislation, customer requirements or other recommendations.

k) All members of the Joint Health and Safety Committee shall participate in training as is deemed necessary to maintain a level of competence.

l) Members of the Joint Health and Safety Committee must attend regularly, any member not in attendance for more than two consecutive meetings without prior notice to a co-chair may be asked to resign from the Joint Health and Safety Committee. Meeting quorum is set at 2 worker and 2 management members.

m) Any employee who has any questions or concerns about any item discussed during our safety meetings are encouraged to speak to their supervisor.

IV. Distribution

- A copy of this procedure is available in the health and safety manual.
- Minutes of the proceedings of the JHSC will be distributed to Senior Management as well as posted on the Health and Safety Communication Board for employee review.

I. Reference Documents

- Joint Health and Safety Committee Term of Reference
- Joint Health and Safety Committee Agenda and Minutes
- A Guide for Submitting Joint Health and Safety Committee Formal Recommendations

We, the undersigned, agree to follow the preceding Joint Health and Safety Committee guidelines to the best of our abilities.

Signed at ROSSCLAIR this _____ day of _____, 2018

FOR THE EMPLOYER:

FOR THE WORKERS:

16.2 Health and Safety Representatives, JHSC and Worker Trade Committee (Job Site)

I. Purpose

To Adhere to regulatory requirements for a worker Health and Safety Representative (HSR), Joint Health and Safety Committee (JHSC) and Worker Trade Committee (WTC) (herein now referred to as the Committee/HSR) at ROSSCLAIR jobsites.

II. Responsibilities

- a) Senior Management shall:
 - Assist and co-operate with the Committee/HSR in carrying out their role;
 - Respond to written recommendations from the Committee/HSR within 21 days. The response must include corrective action time and dates, or reasons for disagreement of recommendations;
 - Provide an assessment of all hazardous chemicals and physical agents found or used in the workplace and provide a copy of this assessment to the Committee/HSR;
- b) Project Managers and Site Supervisors shall:
 - Assist and co-operate with the Committee/HSR in carrying out their role;
 - Post the names and work locations of the Committee members/HSR in the workplace;
- c) Health and Safety representative (worker representatives) shall:
 - Be elected or appointed by workers or trade union
 - Hold or complete Ontario approved training for a certified Health and Safety Representative Certification
 - Participate in monthly workplace inspections
 - Complete and maintain on file the Recommendation Form and submit to Senior Management for response within 21-days of notification, when required
- d) All workers shall:
 - Awareness, understanding and acknowledgement of ROSSCLAIR Project Site Specific and Corporate Head Office Terms of Reference for the Committee/HSR
 - Participate, elect or appointment a Health and Safety Representative as appropriate
 - Follow up with the Committee/HSR should health and safety concerns not be addressed by a Supervisor in a timely manner

III. Procedure

Joint Health and Safety Committee

- a) Is required at a project that at a project that is expected to last more than three months, and where:
 - twenty or more workers are regularly employed;
 - an order to an employer is in effect under section 33; or
 - there are fewer than twenty workers are regularly employed, and a regulation concerning designated substances applies.
- b) The JHSC shall ensure that any health and safety concerns brought to their attention from another worker or through observations are tabled at the Committee meeting or documented on the workplace inspection and will make recommendations for controlling hazards in the workplace.
- c) The JHSC will endeavor to make recommendations that establish, implement, monitor, evaluate and improve company policies, programs and procedures. An effective JHSC ensures that any weaknesses in the company's chain of internal responsibility are identified and that attention remains focused on these weaknesses until they are addressed and resolved.
- d) The JHSC shall be visible to all employees, including workers, superintendents and Senior Management. To this end, all Committee member names and work locations shall be posted on the Health and Safety Communication board.
- e) The JHSC shall meet at least every three months and shall discuss issues including, but not limited to:

<ul style="list-style-type: none"> • First aid records • Accident investigation reports • Hazard/near miss reports • Monthly inspection reports 	<ul style="list-style-type: none"> • Review minutes of prior JHSC meeting • Review training records • Hygiene surveys • Safety talk meeting minutes • Health and safety disciplinary action <ul style="list-style-type: none"> • Ministry of Labour, Health Officer or Director reports
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- f) Workers shall cooperate with the JHSC while they perform their duties. All workers shall comply with this standard, procedures and legislative requirements.
- g) JHSC members shall perform duties as legislated. All safety representatives shall comply with this standard, procedure and legislative requirements.
- h) Worker Trade Committee
- i) A Workers Trade Committee is required on a project where 50 or more workers are regularly employed, and the project duration exceeds 3 months.

- j) The WTC Representative's name(s), trade, and work locations shall be posted in a conspicuous workplace location.
- k) The function of the WTC Representative is to make recommendations to the Constructor/Employer and the workers for the improvement of the health and safety of the workers

Selection of Worker Trade Committee (WTC) Representatives

- l) The WTC representative will be elected by their peers or by trade union. Individuals can volunteer or be nominated. If an election is required, an election will be held to select the job site representative. The successful candidate will receive 65% of the votes.

m) Selection Process for Joint Health & Safety Committee

- i. Worker Member: Elected by their peers at the project site or by trade union. Worker members at head office will be elected by their peers. Individuals can volunteer or be nominated. An election will be held to select the appropriate number of worker members.
- ii. Management Member: A member from Senior Management will select the management members.
- iii. The same process as above will be used for both the worker and management members when selecting alternates.

Worker Certified Member:

- iv. The workers will decide who will become the certified worker member.

Management Certified Member:

- v. The management members on the JHSC will decide who will become the certified management member.

Replacement Process of Certified Members:

- vi. The same process as above will be used to replace the certified member.

Selection of Worker Co-Chair:

- vii. The workers on the JHSC will decide who will become the worker co-chair.

Selection of Management Co-Chair:

- viii. The management members on the JHSC will decide who will become the management co-chair.

n) Selection of Safety Representatives

- i. Project site must be represented on the JHSC, whom do not exercise managerial functions, within the first month of a project. The safety representative shall be elected by the workers.
- ii. There must be at a minimum of one (1) safety representative per job site with more than five (5) workers.

- iii. All safety representatives from each site shall meet at a minimum of 4 times a year (quarterly) under the project specific terms of reference.
- iv. Meeting minutes will be kept on file at the job site and copied to the Head Office for the JHSC for further review and response, when required.
- a) Safety representatives will discuss their inspection reports, accidents, hazard reports and any other safety matters that relate to their jobsite.
- o) The parties acknowledge that the proper functioning of the Joint Health and Safety Committee can only be carried out where the representatives of the employer and the workers are committed to these responsibilities. To this effect, the undersigned agree to support, assist and abide by the following joint health and safety committee structure and guidelines.

Quorum

- p) Quorum refers to the number of JHSC members who must be present at a JHSC meeting to hold the meeting or vote to implement and or request a policy/procedure/work order, etc. on any type of health and or safety related issue. Quorum for ROSSCLAIR purposes is one member representing management and one member representing workers.
- q) *Joint Health & Safety Committee Meetings*
 - ii. JHSC meetings are to be held at minimum on a quarterly basis.
 - iii. Records of all meetings and inspections must be posted on the health & safety bulletin board for a minimum of one (1) month and kept in a file at the project site
 - iv. Meetings shall follow an agenda which includes, but is not limited to:
 - Analysis of: first aid records, accident investigation reports, hazard/near miss reports,
 - Hazards identified on the monthly inspections.
 - Review of: minutes of the last meeting, applicable training records, hygiene surveys, crew talk/safety talk meeting minutes, health or safety related disciplinary action, problematic unplanned inspection reports, repeat items, etc.

Worker Trades Committee Meetings

- r) WTC meetings are to be held as per the schedule determined by the JHSC. It is recommended to have the meetings on the same date as the JHSC meeting. Duration of the WTC meeting will not exceed one (1) hour.
- s) *Confidentiality of Information*
 - ii. The Committee/HSR members are bound by the Occupational Health and Safety Act to keep any personal medical details or other sensitive information they receive while performing their duties confidential. This means paying strict attention to the security of committee records.

- iii. For the Committee/HSR to function properly, all parties must be confident and trust that no improper use will be made of the information received.
- t) *Workplace or Jobsite Inspections*
- ii. The safety representative is responsible for conducting worksite or jobsite inspections once a month. Although it is recommended that the Site Supervisor participate in the inspection.
 - iii. A schedule will be arranged and posted.
 - iv. The standard workplace inspection checklist form will be used during inspection to record:
 - o Specific hazards (existing or potential);
 - o Concerns reported to the inspection team by other workers;
 - o Hazard classification;
 - o Location and/or persons affected by the hazard or concern;
 - o Recommended controls;
 - o Immediate action taken.
 - u) This document will be reviewed and evaluated for adequacy against regulatory requirements and suitability for ROSSCLAIR job site needs annually. Any identified deficiencies will be addressed and recorded

IV. Distribution

- a) Copies of this document is available in the ROSSCLAIR Health and Safety Manual.
- b) This document is available in the Subcontractors/Contractors Safety Agreement.
- c) Minutes of the WTC, JHCS or HSR meeting proceedings shall be posted on the health and safety communication board.
- d) The WTC, JHSC and HSR names, work location and trade (where applicable) shall be posted on the health and safety communication board.

V. Reference Documents

- Joint Health and Safety Committee Term of Reference
- Joint Health and Safety Committee Agenda and Minutes
- A Guide for Submitting Joint Health and Safety Committee Formal Recommendations

Element 17 Workplace Violence and Harassment

17.1 Workplace Violence and Harassment Policy Statement

I. Purpose

- a) The Workplace Violence and Harassment Policy is a statement of intent and includes the principles, philosophies and requirements of ROSSCLAIR, as a minimum will address the following:
- basic objectives of the Program
 - responsibility of all employees
 - Intolerance for disrespectful and or violent behaviour.
- b) All workplace parties, including suppliers and subcontractors must regard the Workplace Violence and Harassment Policy as a directive for compliance with the Health and Safety Program.

II. Responsibilities

- a) Senior Management shall ensure that:
- The Workplace Violence and Harassment Policy and associated Programs are communicated and distributed.
 - Enforcement of the Workplace Violence and Harassment Policy and the Internal Responsibility System is consistent.
 - Actual and potential risk of workplace violence are properly assessed, and the results of this assessment are shared with the JHSC/HSR. This assessment shall be reviewed as often as necessary to protect workers from workplace violence, at minimum annually.
 - All reported incidence of workplace violence and harassment are reported and to promptly respond to, and thoroughly investigate every threat or allegation of workplace violence or harassment in a manner which is fair, respectful and thorough for both the complainant and the alleged perpetrator.
 - Workers are provided with information and instruction on the contents of this policy and associated programs.
 - Measures and procedures to control the risks of workplace violence and harassment are developed to protect workers from exposure to physical or psychological injury.
 - If we become aware, or ought reasonably to be aware, that domestic violence may occur in the workplace, ROSSCLAIR shall take every precaution reasonable in the circumstances for the protection of the worker.
 - During the investigation process workers are protected, which may include ROSSCLAIR removing the suspected or alleged offender from the workplace

with pay, until enough information has been obtained to assess the potential risk.

- If it is determined that there has been workplace violence or harassment or a reasonable risk of workplace violence, harassing conduct, threatening conduct or bullying, the employer shall ensure that adequate steps are taken to prevent any incidence and shall take all corrective actions required to both protect the worker or workplace and discipline the worker involved up to and including dismissal for a single incident.
- All employees are trained and understand the employer's expectations for appropriate conduct at work.
- Retaliation against any employee filing a complaint or participating in the complaint process is prohibited. ROSSCLAIR will not tolerate or permit retaliation by management, employee or co-workers.
- Employees are encouraged to report any incidents of harassment forbidden by this policy immediately, so that complaints can be quickly and fairly resolved.

b) Project Managers and Supervisors are responsible for:

- Consistently following and enforcing this policy, and to observe and monitor the internal responsibility system.
- Encouraging employees to report any incidents of violence or harassment forbidden by this policy immediately, so that complaints can be quickly and fairly resolved. Supervisors must never dissuade, prevent or deny a person from reporting an observation, concern or complaint relating to this policy, nor shall the supervisor ever respond in such a way, as to make any person feel discouraged from providing information relating to this policy.
- Thoroughly and immediately recording and investigating all allegations, incidence or concerns for potential violence, threatening conduct, threats, or bullying behaviour for the protection of the worker and the workplace in a manner which is fair, respectful and thorough for both the complainant and the alleged perpetrator.
- Assessing the risk of workplace violence, daily and reporting the results of any concerns to Senior Management. The supervisor shall consider the nature of the workplace, the type of work or conditions of work, circumstances that would be common to similar workplaces, circumstances specific to the workplace and any other prescribed elements when assessing the workplace.
- Making detailed and specific inquiries of all persons suspected of violating this policy or of being victims of violence or harassment in the workplace, where there is even only a subtle possibility or suspicion that these are possibly occurring or there is a risk of these occurring.
- Providing all workers with information and instruction on the contents of this workplace violence policy and program.

- Assisting Senior Management in developing measures and procedures to control the risks identified in the risk assessment to prevent violence and harassment.
- Conducting at least one follow up interview with any victim or alleged victim to ensure that there are no further problems. Submit the results of this follow up interview to Senior Management.
- Not retaliate against an employee or contract worker for filing a complaint or participating in the complaint process, and will not tolerate or permit retaliation by employee or co-workers

c) Employees shall:

- Report every incidence of observed or suspected violence, bullying, threatening or harassing behaviour to his or her supervisor and the designated workplace violence and harassment coordinator.
- Cooperate with all investigations under this policy.
- Never directly, or indirectly retaliate against any person for cooperating with this policy.
- Understand, comply and apply this Policy in your daily work interactions and activities.
- Take full responsibility for your own actions or lack of actions.
- Seek assistance, clarification or training if you are unsure of your rights, responsibilities, or obligations under this policy
- Report all illegal acts, violations, observations or concerns, which could lead to violence or harassment in the workplace, to your immediate supervisor and or the designated workplace violence and harassment.
- Call for immediate assistance when workplace violence occurs, is likely to occur or when a threat of workplace violence is made.
- Exercise their right to refuse to work where they believe they may become injured because of workplace violence.

III. Definitions

a) *Workplace Violence* is:

- the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker,
- an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker,
- a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

For the purposes of this program, workplace violence also includes any:

- Attempted, threatened or actual conduct that endangers the health or safety of an employee, or any person **on or off** the premises of the employer. Including any threatening behaviour or any action that gives an employee reasonable cause to believe that they are at risk of injury.
 - Verbal, non-verbal or physical behaviour that is threatening to self, others or property, or physical behaviour that actually did harm to self, others, or property.
 - This can include, but is not limited to any hitting, punching, kicking, squeezing, pinching, scratching, twisting, grabbing, bumping, knocking into, biting, pushing and all gestures which may indicate any form of the above.
 - More serious forms of violence such as: beatings, stabbings, shootings, sexual assaults, psychological traumas such as threats, obscene or inappropriate phone calls, emails, or social networking postings, an aggressive, threatening, or intimidating presence, whether intended or not.
- b) *Bullying* is a form of repeated, persistent, and aggressive behaviour which may be direct or subtle and directed at an individual or individuals that is intended to cause (or should be known to cause) fear and distress and/or harm to another person's body, feelings, self- esteem, or reputation. Bullying may occur in a context where there is a real or perceived power imbalance. A real or perceived power imbalance may result from differences based upon position or job title, age, seniority, size, strength, intelligence, economic status, social status, solidarity of peer group, religion, ethnicity, disability, need for special education, sexual orientation, family circumstances, gender, or race. Bullying is a form of harassment and will not be tolerated
- c) *Verbal threats* include both direct verbal threats suggesting potential harm, injury or loss to the recipient and verbally threatening conduct which may not be direct. Verbally threatening conduct also includes any verbal outburst where the result of that conduct makes another person feel threatened or intimidated.
- d) *Workplace harassment* means engaging in a course of vexatious comments or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome.
- Includes any improper conduct by an individual, that is directed at and offensive, to another person or persons in the workplace, and that the individual knew or ought reasonably to have known would cause offence or harm.
 - It comprises any objectionable act, comment or display that demeans, belittles, or causes personal humiliation or embarrassment, and any act of intimidation or threat. It includes but is not limited to, harassment within the meaning of the ***Canadian Human Rights Act, The Canada Labour Code, all Provincial Human Rights Codes and all applicable Provincial Occupational Health and Safety statutes*** which is based upon one or more of the prohibited grounds:

- Race
 - Ancestry
 - Place of origin
 - Colour
 - Ethnic origin
 - Citizenship
 - Disability
 - Creed
 - Sex
 - Sexual orientation
 - Age
 - Record of offences
 - Marital status
 - Family status
- e) *Psychological harassment* means any vexatious behaviour in the form of repeated and hostile or unwanted conduct, verbal comments, actions or gestures, that affects an employee's dignity or psychological or physical integrity and that results in a harmful work environment for the employee.
- f) *Vexatious* is a term used in some Provincial Human Rights Codes to define "harassment". Vexatious means conduct that is without reasonable or probable cause or excuse, intending to cause embarrassment or distress to another person. It is often malicious and intended to hurt another. Harassment is not defined by the intentions of the "harasser" but by the impact that the conduct has on the victim, whether intended or not.

IV. Procedure

- a) The Workplace Violence and Harassment Policy Statement must be reviewed on an annual basis. This review must be documented in the Review, Revisions and Approvals form.
- b) The Workplace Violence and Harassment Policy Statements must be signed and dated by the ROSSCLAIR President.
- c) This policy will be reviewed at least annually and as often as is necessary to ensure that risks are being identified and measures and procedures identified are effectively reducing those

V. Communication

The Workplace Violence and Harassment Policy Statement will be communicated and distributed to all our subcontractors and employees upon request and as part of:

- Employee Orientation
- Subcontractor Safety Agreement
- Posted on all Health & Safety Communication Boards, office and at projects sites
- Safety Talks or Toolbox Talks
- Payroll mail out

VI. Reference Documents

- Workplace Violence and Harassment Policy Statement

Workplace Violence & Harassment Policy Statement

ROSSCLAIR will provide a safe work environment that is free of fear, violence, threats, bullying and all forms of harassment, including sexual harassment from co-workers, supervisors, employers, customers and members of the public. Every employee of ROSSCLAIR has the right to work in an environment free from violence and harassment and where they are treated with civility, decency, dignity and respect. A positive work environment is built on mutual respect, inclusion, and a culture committed to health and safety.

Every employee of ROSSCLAIR has the right to employment, which is free of harassment, sexual harassment and violence in the workplace. Within ROSSCLAIR each person has a direct responsibility for health and safety as an essential part of his or her job. Workers are encouraged to report any incidents concerning themselves or others. This ongoing responsibility is a condition for continued employment.

Workplace violence means:

- The exercise of physical force against a worker, at work, that did or could cause physical injury,
- An attempt to exercise physical force against a worker, at work, that could cause physical injury,
- A statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against the worker that could cause physical injury to the worker.

Workplace harassment means, engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome, or

Workplace sexual harassment means:

- engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or
- making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Harassment, sexual harassment, and violence are critical health and safety concerns and fall within our unwavering and focused commitment to the Internal Responsibility System and our Health and Safety program. Each person is required to take initiative on health and safety issues and work towards solving problems and make improvements on an on-going basis. They do this both singly and co-operatively with others.

It is also one of the personal responsibilities of management, leadership, and the owners of ROSSCLAIR to ensure that the entire system of direct responsibility for health and safety within the workplace is established, promoted and improved over time. All complaints and/or incidents will be investigated in a fair and timely manner. All complaints and/or incidents will be kept confidential unless it is deemed necessary to protect workers.

ROSSCLAIR wants to protect all employees from violence, threatening behaviour, bullying and all forms of harassment in the workplace. Violence, threats of violence, bullying, harassment, and sexual harassment by any employee will be viewed as a fundamental breach of the employment contract and in some circumstances may be inconsistent with continuing employment.

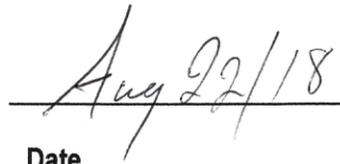
ROSSCLAIR will not tolerate reprisals or retaliation towards any person for complying with this policy.

This includes those who report witnessed misconduct, those who cooperate in an investigation and those who report concerns to their supervisor. Any such behaviour will be dealt with quite severely, up to and including termination of employment.

At ROSSCLAIR, everyone has direct responsibility for health and safety as an essential part of his or her job. It does not matter who or where the person is in the organization, he or she is required to take initiative on health and safety issues and work to solve problems and make improvements on an on-going basis. Violence, threats of violence, verbally threatening conduct, bullying, harassment, and sexual harassment are all health and safety issues.



John E. Richardson
President
ROSSCLAIR Contractors Inc.



Date

17.2 Workplace Violence Risk Assessment

ROSSCLAIR has a strong commitment to the health, safety and welfare of its employees, their families, and its visitors. Widely available statistics and information indicate that the incidence of violence in the workplace is increasing and the effect is devastating to lives, business, and the community at large.

Due to the potential for violence at the workplace, our facility is concerned that the safety of our employees could be endangered. Our commitment to maintaining a safe and secure workplace requires a clear policy and supportive program relating to the detection, treatment, and prevention of workplace harassment and violence.

This policy applies to all ROSSCLAIR employees while on the job and to situations where an employee's conduct off the job or off premises impacts work performance, undermines the public confidence in, or threatens the safety of that employee, other employees, or our organization. Our concern is to ensure that employees can perform their work duties in a safe environment

I. Purpose

- a) To set guidelines for preventing, identifying, and responding to workplace violence, bullying, threatening conduct and all forms of harassment.
- b) To have a fair, objective and efficient process which respects and protects both the rights and needs of complainants and the persons accused under this policy.
- c) To support victims of workplace violence and harassment in such a way that they are encouraged to come forward and report the abuse, rather than suffering in silence.
- d) To reduce the incidence of workplace violence and harassment.

II. Responsibilities

- a) *Senior Management* will be responsible for ensuring:
 - The contents of this procedure are implemented.
 - The Workplace Violence Risk Assessment is performed in accordance with this established procedure and in consultation with the Joint Health and Safety Committee.
 - Adequate controls are implemented to protect workers from workplace violence.
 - The workplace violence risk assessment involves employees from all phases of our workplace. This may include a general survey, interviews or observations.
 - Actual and perceived risks of workplace violence are considered by reviewing past incident reports and information from workplaces similar to ours.
- b) *Supervisors* shall ensure that:
 - Appropriate procedures are in place to minimize the risk to employees from violence, including the immediate response plan for situations.
 - Workers are trained in recognizing and reporting incidents of:

- **Conditions of work** – other factors that may pose a risk such as working alone, working at night, moving from one location to another, the neighbourhood surrounding the workplace (high crime area, isolated) etc.
- b) The risk assessment must also take into consideration:
- Risks that are common to similar types of workplaces, such as the risks of working in buildings located in isolated industrial areas or common risks associated with work from mobile locations.
 - Situations specific to the employer's workplace such as: the layout of the workplace; whether security systems are already in place; previous violent incidents; work being carried out that is associated with higher risk of violence (handling cash, transporting people and goods, working late nights, public or community contact etc.).
 - If the employer has multiple workplace locations of a similar nature (such as repair depots), it is still necessary to consider the risks associated with the physical location of the workplace, for example the safety or isolation of the particular neighbourhood.
 - There are various types of documents and methods which can be used when performing a risk assessment for workplace violence. These include: surveys for employees to complete; facility inspection checklists; and job risk analysis forms. The employer should determine beforehand which method provides the most complete information for their specific workplace.

IV. Procedure

- a) ROSSCLAIR will assess the risks of violence in the workplace and implement controls as deemed necessary. The team assessing the risks may use employee questionnaires, employee interviews, company history, crime measure indices, facility surveys, or other means as deemed appropriate, to adequately assess the risks.
- b) The results of the risk assessment will be provided to the Joint Health and Safety Committee. ROSSCLAIR shall reassess the risks of violence as often as is necessary to ensure that workers are protected; however, at minimum annually.
- c) An action plan listing job tasks or physical aspects of our workplace/process that are moderate to high risk, as per the OHSCOW toolbox assessment tools:
 - General Physical Environment Assessment Checklist, and
 - Specific Risk Factor Checklists.
- d) **Hazard Control** – opportunities for controlling the identified hazards will be recorded on the action plan and submitted to Senior Management. Implemented controls will be determined to best control the risks of violence.

VII. Distribution

- a) The workplace violence assessment will be communicated with the Joint Health and Safety Committee.

- b) Proposed recommendations from the assessment will be reviewed during a JHSC meeting and will be communicated as part of the JHSC meeting minutes by posting on the H&S Communication Board.
- c) A copy of this procedure is available in the ROSSCLAIR Health and Safety Manual.
- d) This procedure is available to Subcontractors/Contractors upon request.

VIII. Reference Documents

- Workplace Violence Hazard Assessment
- Workplace Violence Assessment Tool Checklist Flow Chart

17.3 Workplace Harassment Prevention

I. Purpose

This policy applies to and protects:

- a) Against all forms of harassment, including those protected in the provincial and federal human rights codes, but is not limited to the prohibited grounds. This means that all forms of “personal harassment”, psychological harassment, sexual harassment and “positional harassment” are protected under the policy, even if they do not fall within one of the prohibited grounds under Human Rights Legislation.
- b) Every person who is a manager, supervisor, employee, patron/client/visitor, or subcontractor working on the premises of ROSSCLAIR, or in any work- related activity outside of the premises, including, social events, and private online activities directly or indirectly relating to any of the above.
- c) Every type of workplace violence and harassment, including but not limited to harassment which is based on one of the prohibited grounds under the provincial Human Rights Code legislation. All forms of personal, psychological, positional and sexual harassment occurring in the workplace or in direct or indirect relation to work are subject to this policy.
- d) All forms of conduct and all expressions of conduct, including but not limited to: written, oral, artistic, musical, physical, direct, indirect, subtle and overt, and all communications online, on any social networking site, email, texting, or any electronic form, blog, chat room or website.
- e) THIS POLICY DOES NOT APPLY TO:
 - Poor Performance Appraisals from a supervisor/ manager
 - The proper exercise of management authority to give advice, assignment of work, counseling, discipline or any other supervisory activities
 - Situations that were not managed well
 - Personality differences, interpersonal conflicts or disagreements, a disagreement or misunderstanding
 - Work related change of location, co-workers, or job assignment
 - Criticism poorly delivered
 - Ineffective communication
 - Rudeness unless it is extreme and repetitive
 - An employer or supervisor investigating or inquiring into any matter relating to this policy, or any other employment policy or practice in the workplace

II. Responsibilities

- a) Senior Management shall ensure that:
 - The Workplace Violence and Harassment Policy and associated Programs are communicated and distributed.

- Enforcement of the Workplace Violence and Harassment Policy and the Internal Responsibility System is consistent.
- b) Project Managers and Supervisors are responsible for:
- Consistently following and enforcing this policy, and to observe and monitor the internal responsibility system.
 - Encouraging employees to report any incidents of harassment forbidden by this policy immediately, so that complaints can be quickly and fairly resolved. Supervisors must never dissuade, prevent or deny a person from reporting an observation, concern or complaint relating to this policy, nor shall the supervisor ever respond in such a way, as to make any person feel discouraged from providing information relating to this policy
- c) Employees shall:
- Report every incidence of observed or suspected bullying, threatening or harassing behaviour to his or her supervisor and the designated workplace violence and harassment coordinator.
 - Cooperate with all investigations under this policy.
 - Never directly, or indirectly retaliate against any person for cooperating with this policy.
 - Understand, comply and apply this Policy in your daily work interactions and activities.
 - Take full responsibility for your own actions or lack of actions.
 - Seek assistance, clarification or training if you are unsure of your rights, responsibilities, or obligations under this policy

III. Procedure

- a) Positional harassment can occur between managers, supervisors or between an owner, employer, and someone in a position with less authority or power. With positional harassment, one person is usually in a position to confer, grant or deny a benefit, privilege, favour or advancement to the person. Positional harassment can result in an abuse of authority and occurs when a person uses his or her authority to unreasonably interfere with an employee or the employee's job. Positional harassment also occurs when the alleged perpetrator occupies a special position of power, influence, skill or expertise.
- b) Harassment is determined not by the intention(s) of the alleged harasser, but by the impact that the harassing conduct has on another person or group of persons in the workplace. This means that a harassment complaint could result in any one or more of the following:
- A Human Rights Code / Canada Human Rights Code / Canada Labour Code complaint being filed;

- A grievance being filed;
- Disciplinary action by the employer up to and including dismissal from employment;
- Criminal charges; or
- A wrongful dismissal, constructive dismissal, or tort action in civil court.

c) Recognizing Harassment

1. Can be any objectionable or improper, act, comment or display directed at another person or group in the workplace
2. Does not have to be intentional
3. Can be direct, obvious and open
4. Can be very subtle, indirect, barely noticeable
5. Harassment is determined by the perceptions of the target / victim and not the intentions of the alleged harasser
6. It usually reflects an ongoing pattern of conduct, but can result from a single incident
7. The test is: whether a reasonable person knows, or ought to know, that the behaviour would be considered unwelcome or inappropriate
8. Open or subtle expressions of hostility
9. Gestures, facial expressions, hand movements, finger pointing, body language, eye movements/staring/glaring
10. Verbal assaults
11. Behaviour, jokes, comments done in poor taste or with poor judgment
12. Verbal abuse or threats
13. Unwelcome jokes, subtle innuendoes or taunting
14. Displaying pornographic, racist or other offensive or derogatory pictures, posters or cartoons
15. Practical jokes which cause awkwardness or embarrassment
16. Unnecessary, unwanted or even playful physical touching, patting, pinching or punching
17. Sexual suggestions, offers, remarks, rubbing, leering/staring, request, suggestions, hints of a sexual nature (especially if coming from a supervisor)
18. Questions/comments about a person's sex life, marital relations, relationship status with partner of the same sex, sexual attractiveness
19. Any unwanted sexual attention from another employee

d) ROSSCLAIR has appointed a person to act as the company Workplace Violence and

Harassment Coordinator which is identified on our Organizational Chart.

- e) To create a safe work environment, it is important that all persons in our workplace observe the same rules of behaviour. These rules are created to help reduce incidence of confrontation, violence, bullying, threats or harassment against or among employees.
- i. Employees who witness others who are violent, verbally abusive, threatening, bullying or engaging in any form of harassment are required to immediately report this information to their supervisor. Failure to report this type of conduct observed will be viewed as a fundamental breach of the employment contract which may be inconsistent with continuing employment.
 - ii. All incidence of violence, threatening, bullying or harassing behaviour or any behaviour which raises concerns about the safety of someone in the workplace (such as gestures, intense stares, notes or pictures, subtle remarks) shall be reported to a supervisor each and every time.
 - iii. Retaliation or reprisal against anyone for participating, reporting or cooperating within this policy, will be viewed as a fundamental breach of the employment contract which may be inconsistent with continuing employment.
 - iv. All incidence of assault by any employee or against any employee will be reported to the police.
 - v. Assault is defined as any physical action that injured a worker or could have injured a worker.
 - vi. All incidence or potential incidence of domestic violence in any way related to the workplace shall automatically fall under the domestic violence policy. Any time domestic violence is a reasonable possibility the matter shall be classified as a “high risk” and shall be dealt with immediately. This is non-discretionary.
- f) All domestic violence allegations, concerns or potential risks, **MUST** be addressed through the formal complaint procedure; this is **NON-DISCRETIONARY**. There is no option for the employer or the victim, to “exit out” of this policy in a potential domestic violence case.

Training Requirements

- g) All employees will receive training in the requirements of this policy at the time that orientation is completed and thereafter as may be required. Training on this policy and our violence and harassment prevention program will include training on:
- This policy
 - Measures and procedures that will be used to assess and reduce risks of violence / harassment in the workplace
 - Measures and procedures for summoning immediate assistance when needed
 - The mandatory requirement for all employees to report suspected and observed violations of this policy
 - How to report observed or suspected incidence of violence/harassment

- How the employer will investigate, and address observed or suspected incidence of violence/harassment
 - Possible consequences for violations of this policy
 - The employer's obligation to provide information
 - How and where to submit questions or suggestions for revisions to this policy
- h) All management and supervisors will receive training in "Violence in the Workplace". This training should address:
- What does the Law say about Violence in the Workplace and how does a supervisor or manager become responsible for the behaviors of their staff.
 - What is Violence in The Workplace.
 - How do situations get out of hand.
 - How to deal with situations that could or have gotten out of hand and workers are at risk.
 - How to investigate a threat to workers.
- i) Managers and Supervisors will be required to receive the above training every 3 years or if a situation arises that would warrant reviewing the policy and procedure

IV. Distribution

- a) A copy of this procedure is available in the ROSSCLAIR Health and Safety Manual.
- b) This procedure is available to Subcontractors/Contractors upon request.

V. Reference Documents

- Workplace Violence and Harassment Policy Statement

17.4 Reporting, Follow Up and Early Resolution for Workplace Violence and Harassment

I. Purpose

To provide a standard process for:

- b) Reporting incidents of workplace violence and harassment.
- c) Conducting consistent non-discretionary follow-up inquiry interviews to ensure:
 - No form of subtle retaliation is occurring;
 - There is no ongoing or continued risk to the employee/person which may be minimized, denied or ignored by the victim;
 - Effectiveness of the corrective action taken
- d) To support victims of workplace violence and harassment in such a way that they are encouraged to come forward and report the abuse, rather than suffering in silence.
- e) To reduce incidence of workplace violence and harassment

II. Responsibilities

- a) Senior Management has an ongoing responsibility to respond immediately to any activity in the workplace which undermines this policy, **whether or not** there has been a complaint and whether or not the behaviour was deliberate.
- b) Project Managers and Supervisors must take prompt and appropriate action to prevent and respond to any violation of this policy. Corrective action by the employer or a supervisor does NOT have to be driven by a complaint but may arise out of the employer's or the supervisor's authority and ongoing responsibilities to take all reasonable precautions for the protection of the workers.
- c) All workers must be:
 - Respectful with fellow colleagues through the course of their employment.
 - **Immediately** report any actual or perceived incidents of harassment.

III. Procedure

- a) Reporting procedure:
 - i. Employee will report preferably in writing using the (complaint / concern / incident reporting form) to his or her supervisor or person in authority immediately after the incident / alleged incident occurs. If an employee would prefer to give the complaint form directly to the investigation team, they are welcome to do so.
 - ii. In some cases, the worker may just want to discuss briefly a concern with the supervisor or person in authority and may choose not to file a formal complaint or report of violence. If the worker chooses to opt out of the reporting procedure, supervisors or managers involved are still required to document the complaint.
 - iii. The worker will give the completed form to their supervisor who will immediately deliver in person (if possible) the completed report to the supervisor. If the supervisor is not present then the completed form must be sent via email (flagged

urgent), or you can send a letter to your supervisor or manager

b) Non-discretionary follow-up procedure:

Each concern or complaint raised in relation to this policy must have a minimum of two mandatory follow-up inquiry interviews with the victim, within six months of the complaint or concern being raised. These inquiry interviews will be spaced according to the severity and nature of the complaint and set out in the Guidelines to this Policy.

- At least two of the follow up interviews MUST be completed and recorded by the designated person identified by the employer for the administration of this policy.

c) Early resolution and exiting out of this policy:

The employer will always consider, permit and facilitate an early resolution and exiting out of this policy in a fair and respectful manner without having to resort to the FORMAL complaint process.

Especially in cases involving workplace harassment, every effort will be made to resolve the problem early with open communication and in a co-operative manner. The use of problem resolution mechanisms such as coaching, counseling, mediation, alternative dispute resolution and facilitation can in many instances resolve the issue and prevent the situation from escalating to the point where filing a formal complaint is necessary.

- i. The person who feels offended by the actions of another person(s) at this workplace, regardless if they are a visitor or a co-worker, is encouraged to make it known that the comments or gestures are not welcome and ask them to stop them. This should be done to resolve the problem.
- ii. If the problem is not resolved or if the offended person does not want to speak directly with the other, they should meet with their supervisor, or with another manager, and advise them of the situation. Provide them with details of the harassment or offending conduct. They will then discuss with you what actions you feel should be taken to resolve the matter. The attempt to discuss the matter with you is to determine if a formal complaint should be made.
- iii. Management must make every effort to resolve the issue between the parties as quickly and as efficiently as possible, if necessary with the assistance of an outside resource person.
- iv. Every reported instance of a violation of this policy is NOT required to result in the formal complaint procedure being implemented. All efforts to investigate and resolve efficiently and effectively should be exhausted first.
- v. Despite the ability to exit out of this policy, the employer always has the right and authority to move forward with corrective action or to deny an exiting out of this policy, in all cases where it is deemed necessary to meet the reasonable objectives of the employer, to protect the employee or to protect the workplace.

d) Reporting Expectations and what must be followed:

- i. Every situation that is a violation of this policy must be reported to the employer.

- ii. The employer must record and respond to the information received.
 - iii. Corrective action (formal or informal) must be implemented and documented in every complaint or concern.
 - iv. Each concern or complaint raised must have a minimum of two follow up interviews with the victim, by the two designated persons appointed by the employer within six months of the complaint or concern being raised. All domestic violence allegations, concerns or potential risks, MUST be addressed through the formal complaint procedure; there is no option to exit out of this policy.
 - v. In every case where there is a risk, threat or attempt at suicide, in the context of an intimate relationship (even if there has been no previous or known domestic violence) the situation MUST be considered high risk for domestic violence at all times. Outside assistance must be sought.
 - vi. In every instance of a threat to commit assault or homicide, or an actual assault, the local police must be called.
 - vii. In any instance where there has been a threat of self harm, our company will insist a professional assessment be conducted.
- e) The following forms are to be used in conjunction with this policy:
- Incident / Complaint /Concern Form
 - Incident Investigation Form
 - Follow up and Resolution of Complaint Form
- f) Corrective action procedure
- i. Any violation of this policy (including a single incident) will result in an investigation and individual assessment. Any of the following corrective actions may be initiated by the employer:
 - Counseling, discussion or advice
 - Anger management training
 - Graduated discipline and corrective actions up to and including potential dismissal
 - Medical treatment or a professional assessment
 - Temporary paid, non-disciplinary suspension at the employer's discretion
 - Mediation
 - Any other corrective measures that may be directed by the employer (changes in job duties or location that are deemed necessary for the temporary or permanent
 - control and management of the risk of further violence or harassment in the workplace)

- ii. Disciplinary or corrective measures may also be taken against the following:
 - Any manager who is aware of a harassment situation or act of violence or potential violence and who fails to take corrective action;
 - Any employee/worker who is aware of a harassment situation or an act of violence or potential violence and who fails to report this to a supervisor;
 - Anyone who interferes with the resolution of a complaint by threats, intimidation or retaliation; or
 - Anyone who files a complaint that is frivolous or in bad faith.

IV. Distribution

- a) A copy of the Workplace Violence and Harassment Policy Statement and associated prevention programs and forms are available in the Site Safety Plan.

V. Reference Documents

- Employee Harassment or Act of Violence Report

Element 18 Return to Work

18.1 Early and Safe Return to Work Program

I. Purpose

- a) To ensure that an Early and Safe Return to Work Program is developed, implemented and maintained. This program will be used to assist workers who are injured in the workplace. It will provide every opportunity for injured workers to return to gainful employment in the event of a disabling workplace accident.
- b) To make every reasonable effort to provide modified work to any employee who is unable to perform his / her normal duties as a consequence of injury or illness

II. Responsibilities

- a) Senior Management is responsible for:
 - Ensuring that there is a fair and consistent program for returning employees back to work.
 - Ensuring that either a person or committee is given the responsibility to oversee the Modified Work Program.
 - Working with the service provider in the Return to Work Plan.
 - Employers benefit because Modified Work Programs put skilled workers back on the job as quickly as possible after an accident, and thereby:
 - ✓ Maintain high productivity levels through the use of already trained workers.
 - ✓ Eliminate the non-recoverable costs of training new workers.
 - ✓ Reduce the costs of hiring and training replacement workers.
 - ✓ Reduce unnecessary lost time.
 - ✓ Maintain goodwill and employee relations.
- b) The Project Manager and Site Supervisor are responsible for:
 - Ensure that a “Physical Demands Description (PDD)” is conducted on the various tasks/jobs within their area of responsibility. A “Physical Demands Description Form” can be found in the Early and Safe Return to Work Supplementary Program.
 - Ensuring that every reasonable effort is made to provide suitable modified work to any employee who is unable to perform his/her normal duties, as a consequence of work related injury or illness.
 - Maintaining contact with absent employees.
 - Monitoring the employee on a daily basis.
 - Ensuring that no other tasks are being done other than those in accordance with the restrictions on the functional abilities form.
 - Completing weekly modified work evaluations.

- Reporting to the Health and Safety Program Coordinator if the employee on modified work complains.
- c) Workers are required to:
- Participate in the Modified Work Program.
 - Report all accidents or illness immediately to the Supervisor.
 - Obtain medical attention and advise the doctor of modified work availability.
 - Obtain clearance from treating physician for return to modified work.
 - Report back to the Supervisor after consulting with the doctor and submit Restriction Forms that have been filled out by the doctor.
 - Assist the Supervisor in completing the required Accident Investigation Reports.
 - Maintain regular contact with the Manager.
 - Bring any concerns about their modified work duties to the attention of the Manager so potential problems can be resolved quickly.
- d) Joint Health and Safety Committee/Health and Safety Representative is to:
- Be consulted when conducting Physical Demands Analysis and developing the Return to Work Program.
 - Monitor the Return to Work Program and, if required, make recommendations to enhance the program.
 - Assist in determining if any regular work can be modified.
 - Assist in identifying jobs that are suitable for modified work.
 - Assist in identifying special modified work jobs that can be created for a temporary period, to be used only for the Modified Work Program.
 - Communicate the goal and objective of the Modified Work Program to all employees.
- e) Physician or Medical Practitioner is required to
- Where possible, complete the Functional Abilities Form provided by the employee.
 - Clearly identify the functional impairment of the injured employee and the time frame for recovery.
 - Support the Modified Work Program.
 - Monitor the physical condition of the employee and recommend modifications.
- f) Workplace Safety and Insurance Board
- Adjudicate the claim for compensation.
 - Facilitate the ESRTW
 - Assist in work site analysis and individual casework

III. Definitions

Modified Work: Any job, task or function that a worker may perform safely within their physical limitations without risk of re-injury. The work is of a temporary nature and should not exceed 8 – 12 weeks in duration.

Physical Demands Description (PDA): The evaluation and assessment of the physical strength, mobility, coordination and vision required to perform a particular job and the assessment of physical and chemical hazards that an employee is subject to when performing the regular duties of that job.

IV. Procedure

- a) Through the Early and Safe Return to Work Program, ROSSCLAIR hopes to:
 - Reduce the number of days lost to injury or illness
 - Reduce the financial impact on the worker by returning them to work as soon as possible
 - Reduce costs that may be associated with an injured worker’s absence
 - Educate all workers on disability management
 - Comply with all applicable legislation, including the Workplace Safety and Insurance Act and the Human Rights Code
 - Reduce the potential for future injuries and illnesses
- b) The Early Safe Return to Work Program will be broken into two stages:
 1. To prevent workers from losing time due to workplace injuries (adherence to the Workplace Safety and Insurance Act WSIA)
 2. To return workers to gainful employment as soon as medically authorized. This will be done on potentially two levels:
 - a) permanently modified work;
 - b) temporary modified work.

Note: The Manager will involve the participation of the JHSC Safety Worker Representative and the Safety Coordinator in the Return to Work Plan where necessary.

- c) Any employee who has a work-related accident causing injury must report to their Supervisor immediately as the circumstances safely provide.
- d) The Supervisor will attend to the worker’s immediate first aid needs and arrange for escorted transportation, which may include an ambulance, to the local clinic or medical facility. Where possible, the Supervisor will accompany the injured worker.
- e) The Supervisor will notify the Health and Safety Program Coordinator and then thoroughly investigate the accident (refer element 10).
- f) The Health and Safety Program Coordinator will complete the “**Employer’s Report of Injury/Disease Form 7**” and the “**Investigation Report**”. The “**Employer’s Report**

of Injury/Disease” must be sent to the Workplace Safety & Insurance Board within 3 days of occurrence.

- g) If modified work is necessary, the worker will have their doctor complete the **“Functional Abilities Form”** and return it to the Supervisor.
- h) The Supervisor will review the physical limitations with the employee and discuss the modified work program and any offers of modified work.
- i) The employee accepts or rejects the modified work.
- j) On acceptance of modified work, the Supervisor will monitor the employee’s progress.
- k) In case of rejection of modified duties, and without medical documentation, the employee will be advised that his benefits may be affected.
- l) A copy of the Functional Abilities Form is to go to the WSIB Claims Adjudicator. In the case of a dispute, a decision will be made with the input of the Committee, the physician and the WSIB.
- m) The Modified Work Program
 - i) Modified work is any job, task, function or combination thereof that a worker who temporarily suffers from a diminished capacity may perform safely without risk of re-injury or exacerbation of disability or risk to others.
 - ii) The objective of this program is to restore workers who have an injury or illness, through progressive re-integration into his / her regular job wherever possible.
 - iii) If it is apparent that a worker cannot do their regular job, the Supervisor will look for ways of modifying the regular job, so it will comply with the worker’s limitation.
 - iv) If it is not possible to modify the regular job, the Supervisor will consider alternate jobs.
 - v) The work must be productive, and results of the work must have value.
 - vi) Every case will be assessed on an individual basis with the support of the involved employee, their physician, the Workplace Safety and Insurance Board, the Supervisor, and the Joint Health and Safety Committee.
 - vii) Modified work should be acceptable to all parties.
 - viii) It will not extend beyond eight (8) weeks, other than in exceptional cases when extensions may be granted on an individual basis.
 - ix) A plan with target dates and objectives will be made for all programs.
 - x) Assessments will be done weekly.
 - xi) If modified work is not practical, the worker remains off on leave.
 - xii) Modified work may include:
 - Working fewer hours
 - Taking more frequent rest breaks
 - Obtaining assistance from co-worker for more difficult tasks

- Job / responsibility sharing
 - Physical changes to work environment
 - Assisting devices
 - Assignment to another job
 - Special project work
- xiii) In the case of a permanent impairment, the Supervisor will meet with the worker to consider what additional measures are necessary for placement of that employee.
- n) Follow-Up Procedure
- If the physician identifies on the Functional Abilities Form that a follow-up is required, the following procedure should be followed:
- The Supervisor will identify the assessment date and provide the employee with another Functional Abilities Form to be taken to the attending physician. They will advise the employee to return the completed form following the assessment.
 - When the employee returns with the completed Form, the Supervisor will review the form with the employee and discuss the modified work that is available for his / her restrictions.
 - The employee accepts or rejects the modified work.
- o) Procedure for Employees Absent from Work on Disability Programs
- i) All employees absent from work must keep in touch with the Supervisor at least once per week.
 - ii) The Functional Abilities Form must be filled out by the doctor on each visit and returned to the office.
 - iii) It is expected that anyone who is disabled will be seeing his or her doctor on a regular basis.
 - iv) Where appropriate, such frequency should be communicated to the Supervisor.
 - v) Where necessary, the office will clarify the modified work details with the doctor.
 - vi) The Modified Work Committee will do the Modified Work Plan.
 - vii) If it is not possible to accommodate an employee's restriction, the employee will remain on leave.
 - viii) If the employee's condition deteriorates while on modified duties, the Supervisor will quickly notify the Employer for furtherance to authorized parties, and the treating physician will reassess the employee as soon as possible.
 - ix) Follow-up involves assessing the employee's ability to perform the modified duties safely and will continue until the employee has returned to full duties.
- p) Workplace Parties Co-Operation Obligations
- Employers and workers are required to co-operate with each other and with the WSIB

in the return to work process by:

- i) Initiating early contact
- ii) Maintaining communication throughout the worker's recovery
- iii) Identifying modified work or work reintegration opportunities for the worker
- iv) Providing the WSIB with all necessary and relevant information concerning the return to work program
- v) Notifying the WSIB of any dispute or disagreement concerning the workers return to work.

The obligations of the workplace parties to co-operate within this program apply from the date of injury or illness until the occurrence of one of the following (whichever occurs earliest):

- vi) The worker's loss of earning can no longer be reviewed by the WSIB (usually 72 months after the date of injury)

OR

- vii) There is no longer an employment relationship between the workplace parties because either
 - ✓ The worker quits, or
 - ✓ The employer terminates the employment for reasons unrelated to the work injury/illness, any related absences from work, treatment for the injury/illness, or the claim for benefits.

OR

- viii) The WSIB is satisfied that no current suitable work with the employer exists or will exist in the reasonably foreseeable future.

q) Ensuring Compliance with these Guidelines

The WSIB will ensure that they have provided education, information and support to the workplace parties regarding their co-operation obligations. Therefore, if the WSIB finds that either or both of the workplace parties refuse to co-operate, they may

- i) Reduce or suspend the worker's benefits, and/or
- ii) Levy a penalty on the employer that is equivalent to the costs of providing benefits to the worker.

This can only be done if the WSIB first determines that suitable work is available, and that it is either not provided by the employer or not accepted by the worker.

r) VALID REASONS FOR NON-CO-OPERATION

- i) Workers - Generally limited to circumstances beyond the worker's control such as:
 - ✓ Strike/lockout
 - ✓ Death in the family
 - ✓ Unexpected illness or accident

ii) Employer – Generally limited to circumstances beyond the employer’s control such as

- ✓ Scheduled workplace shutdown
- ✓ General layoff
- ✓ Strike/lockout
- ✓ Reorganization
- ✓ Unexpected emergency

s) Non-Co-Operation Penalties

- i) The Employer and worker could be subjected to penalties for non-co-operation if the WSIB determines that either workplace party”
- had knowledge of his or her obligations
 - had the capability to carry it out, and
 - did not carry it out.

The WSIB will generally look at the pattern of actions and behaviours of the workplace parties in determining these factors, as well as the degree to which the workplace party has initiated or participated in required activities.

ii) Worker’s Penalty

Initial Penalty – Reduction of wage loss benefits by 50% from the date the written notice comes into effect until the 14th day following that date, or the date on which the worker starts co-operating again, whichever is earlier.

Full Penalty – Suspension or further reduction of the worker’s wage loss earnings.

iii) Employer’s Penalty

Initial Penalty – A penalty equivalent to 50% of the cost of the wage loss benefits to the worker from the date the written notice comes into effect until the 14th day following that date, or the date on which the employer starts co-operating again, whichever is earlier.

Full Penalty – A penalty equivalent to 100% of the cost of the wage loss benefits payable to the worker, plus 100% of any costs associated with providing work transition services to the worker.

t) Duty to Accommodate

The Employer has a duty to modify the work or the workplace to accommodate the needs of the worker to the extent of undue hardship. This duty arises through the obligation to re-employ set out in the WSIA and the Ontario Human Rights Code or the Canadian Human Rights Act.

V. Distribution

- a) The ESRTW policy will be included in the Employee Handbook and the procedure will be reviewed during the orientation process.

- b) The ESRTW standard will be communicated to all employees.
- c) All current staff will receive training on this program through safety talks.
- d) All new employees will receive training on this program during orientation

VI. Referenced Documents

- Early and Safe Return to Work Policy
- First-Aid Log
- Accident Investigation Form
- WSIB Form 7- Employer's Report of Injury/Disease (form # 0007A)
- WSIB Form 6 - Employee's Report of Injury/Disease (form # 0006A)
- Functional Abilities Form (form # 2647A)
- Letter to Employee regarding Early and Safe Return to Work
- Letter to Health Care Provider
- Employee Contact Log
- Letter of Modified Duties
- Claims Management Record of Events
- Other WSIB forms that may be required are:**
 - Employer's Subsequent Statement form 0009C

Early and Safe Return to Work Program Policy Statement

The management of ROSSCLAIR is committed to providing a safe and healthy work environment for all of its employees. Protection of employees from injury or occupational disease is a major and continuing objective. However, if a worker does become injured or ill in the workplace, due to both occupational and non-occupational causes, we will take all steps necessary to ensure that the lines of communication stay open and that we can work together with that worker in arranging a return to productive and meaningful work based upon their functional abilities.

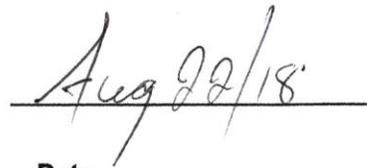
We will work collaboratively with the worker to enable them to stay at work during recovery. If the worker is unable to return to their pre-injury/illness position we will work together with the worker to find ways to either modify their job or find alternate work that will suit the worker's abilities.

In the event that a worker may never be functionally able to return to their pre-injury/illness work, we will continue to accommodate the worker in accordance with applicable Human Rights Legislation.

Every worker must participate in ROSSCLAIR's Early and Safe Return to Work program in the event of an injury or illness. Workers are expected to provide their Supervisor and/or Employer with applicable information and feedback regarding his or her own health and safety in order for everyone to work together and continuously improve on the program elements.



John E. Richardson
President
ROSSCLAIR Contractors Inc.



Date

Element 19 Management Review

19.1 Continuous Improvement Plan

I. Purpose

To ensure a managed process is in place for continuous improvement of the Health and Safety Program.

II. Responsibilities

a) The President is responsible for:

- Ensuring the Health and Safety Program is properly implemented at all levels of the organization. Including the reviewing and approving the program elements.
- Reviewing the Continuous Improvement Plan and all other identified opportunities for improving or enhancing the Health and Safety Program and providing the necessary resources for this to happen.
- Participating in Management Reviews with the Health and Safety Program Coordinator.

b) Senior Management is responsible for:

- Establishing a Continuous Improvement Plan defining health and safety objectives for the upcoming year.
 - Objectives must be **SMART**:
 - i. **S**pecific
 - ii. **M**easurable
 - iii. **A**chievable
 - iv. **R**ealistic
 - v. **T**ime bound
- Ensuring adequate communication of the Health & Safety objectives throughout the company.
- Establishing key performance indicators to monitor progress of achieving the Health & Safety objectives as well as monitoring the performance of the Health & Safety Program.
- Effectively initiating and monitoring the Health and Safety Program under the CORTM Audit Tool.
- Appointing an Internal Auditor for the Company.
- Preparing and distributing a notice on an annual basis to all employees of the purpose for the audit, any requirements and means of distribution (i.e. meetings, tool box talks, and memo) will conduct a formal review of the audit report (and supporting evidence) with the auditor.
- Holding periodic reviews to evaluate the effectiveness of the Health & Safety KPIs and level of Health & Safety objective achievement.
- Implementing corrective actions using the Safety Action Plan form to address

any deficiencies or shortfalls identified during the review of the KPIs and Health & Safety Objective progress.

- Identifying overall Action Plan for all elements with agreement by means of date and signature by Senior Management.
- c) Health and Safety Program Coordinator is responsible for:
- Performing an annual review of the Health and Safety Program.
 - Developing a continuous improvement plan.
 - Assigning responsibility for program elements with target dates for completion.
 - Making recommendations to Senior Management on how to celebrate program successes.
- d) Joint Health and Safety Committee / Health and Safety Representatives are responsible for:
- Participating in the annual review of the safety program with Health and Safety Program Coordinator.
 - Making recommendations on how to continually improve or enhance the health and safety program.

III. Procedure

- c) The Health and Safety Program Coordinator, with input from the JHSC/HSR will make recommendations on how to improve the overall health and safety program by assessing the following program elements:
- Training Needs Review. (element 8)
 - Health and Safety Program Annual Review.
 - Safety Action Plan.
 - Health and Safety Statistics and Records (element 12).
 - Health and Safety Communications (element 8).
 - Senior Management Workplace Inspections (element 9)
- d) Proposed recommendations will be presented to the President and Senior Management by the Health and Safety Program Coordinator.
- e) Approved recommendations will become the Health and Safety Initiatives and Objectives for the upcoming year.
- f) The Health and Safety Program Coordinator will provide the Supervisor with a Safety Action Plan on any changes or recommendations to the programs or revisions required to the Health and Safety Manual.
- g) The progress of achieving these goals will be evaluated quarterly by the Health and Safety Program Coordinator.

- h) Health and Safety Program Coordinator monitors the KPIs and schedules senior Management Review meetings to discuss the performance of the Health & Safety system and status of health & safety objectives.
- i) Action Plan is developed based on identified shortfalls in the health & safety system.
- j) An approved (signed), prioritized action plan (complete with assignment of responsibility and anticipated implementation dates) will be drafted and provided to all management staff to be addressed with all personnel. This will be accomplished in any or all the following manners:
 - o At a regular company meeting
 - o Safety committee(s) meeting
 - o During tool box talks
 - o At site progress meetings
 - o A Company memo/newsletter to all staff acknowledging the results of the formal review/evaluation and thanking everyone for their support and participation
- k) Review/Revision Tracking Form shall be used to record modifications to the Health and Safety Program Manual and changes are communicated to all personnel by Senior Management.
- l) Annual review of Procedure to identify any changes to ROSSCLAIR's Health and Safety Program; Revision Page will reflect the review and update

IV. Distribution

- a) Continuous Improvement Plans are posted on the employee notice board.
- b) Program successes and milestones will be acknowledged and celebrated at the discretion of senior management.

19.2 Management Meetings

I. Purpose

The goal of conducting Management meetings is to provide an opportunity for every manager and supervisor to express concerns and raise questions, individually or through employee discussions, which will lead to enhancing the spirit of well-being within ROSSCLAIR. Along with business matters, these meetings will equally focus on health and safety issues.

- a) Discuss employee concerns and requests
- b) Discuss supervisor concerns
- c) Discuss supervisor workplace inspections
- d) Discuss the future of the company
- e) Analyze the recommendations of the Joint Health and Safety Committee
- f) Respond to any enquiries of the Joint Health and Safety Committee
- g) Analyze Workplace Safety and Insurance Board fees
- h) Analyze accident and incidents reported
- i) Analyze compensation claims
- j) Perform unplanned workplace inspections
- k) Perform planned general inspections

II. Responsibilities

Senior Management shall ensure that these meetings are held as required by this procedure and that minutes kept of the proceedings.

III. Procedure

- a) The company will hold these meetings at minimum monthly and analyze and recommend actions to be done.
- b) Minutes of the meeting will be kept and filed for future reference. These minutes will be available to the WSIB and the Government, as necessary.
- c) Recommendations made by the Joint Health and Safety Committee will be discussed and documented. Responses to these recommendations will be forwarded to the Secretary.
- d) Structure of Management Meetings
 - The meetings shall take place at least monthly.
 - Management may invite any additional person(s) to attend the meeting to provide additional information and comments, but they shall not participate in the regular business of the meeting.
- e) Functions of the Management Meetings shall include the:
 - Analyzing of claims, accidents and incidents that have happened in the

workplace.

- Discussing and responding to any recommendations from the Joint Health and Safety Committee/Health and Safety Representatives.
 - Discussing any inquiries from the Site Supervisors
 - Discussing and responding to employee concerns and questions
- f) A Secretary shall be designated to take minutes during the meeting. The secretary will also be responsible for circulating the minutes following the meeting.
- g) All agenda items raised in the meetings will be dealt with on the basis of consensus rather than voting. Formal motions will not be used.
- h) All items that are resolved and those that are not will be reported in the Minutes. Unresolved items will be so recorded and placed on the agenda for the next meeting
- i) All Management personnel will keep medical or trade secret information confidential.

IV. Distribution

- a) Meeting minutes will be kept by the Health and Safety Program Coordinator.
- b) Formal recommendation responses shall be returned to the JHSC within 21 days.

V. Reference Documents

- Management Meeting Minutes
- Formal Recommendations from JHSC

Element 20 Document Control

20.1 Document Control Procedure

I. Purpose

The scope of Document Control Policy is limited to the OHS documentation. It applies to all the policy, procedure and standards documents generated in ROSSCLAIR. The purpose of this policy is to:

- a) Establish a uniform and consistent method for preparing and handling documentation.
- b) Specify who controls the documentation.
- c) Identify the location of documentation storage.
- d) Manage information and files in compliance with regulations and other requirements.
- e) Control access to information and secure a complete history of all document related activity.
- f) Reduce paper-based document control with an electronic document control system.

II. Responsibilities

- a) Senior Management is responsible for ensuring this document is implemented and maintained.
- b) Health & Safety Program Coordinator or designate is responsible for ensuring that all documents pertaining to the Corporate Health and Safety Program Manual are maintained in accordance to this procedure.
- c) All employees of ROSSCLAIR company shall:
 - Adhere to the provisions set forth in this policy.
 - Develop documents adhering to this policy
 - Ensure old versions (paper) of Site Health and Safety Plans are destroyed upon notification of update by the Health and Safety Program Coordinator.

III. Procedure

- a) Documentation is controlled by the Health and Safety Program Coordinator. Upon approval, OHS documents are stored on shared server in OHS database and will be available for read-only access to the ROSSCLAIR employees.
- b) Types of Document maintained are:
 - OHS Manual
 - Master list Document
 - Policies (OHS, Workplace Violence and Harassment and Return to Work.
 - Procedures, Safe Job Procedures
 - Forms and Checklists
- c) The policies associated with the Health and Safety Program (Occupational Health and

Safety Policy Statement, Workplace Violence and Harassment Policy Statement and the Early and Safe Return to Work Policy Statement) are reviewed annually, signed and controlled separately. The controlled documents are scanned and then embedded into the Site Health and Safety Manuals and the Corporate Health and Safety Manual.

d) General Documentation Guidelines

- i. All the OHS related documentation will be maintained in Public Drive/Admin/Health and Safety, administered by the Health and Safety Program Coordinator.
- ii. Documents related to Occupational Health and Safety Management System are identified in a master list of documents which contains details of documents like document name, storage location etc.
- iii. PDF copies of the OHS documentation will be created and accessible to all in the in Public Drive/Admin/Health and Safety.
- iv. Modified Documents that have been reviewed and approved by Senior Management will be converted to PDF and placed in the in Public Drive/Admin/Health and Safety folder.
- v. All the documents will be version controlled.
- vi. Documents will undergo various stages like creation, revision, change control and disposal throughout the Documentation lifecycle.
- vii. All the employees except the Health and Safety Program Coordinator will be granted Read only access to in Public Drive/Admin/Health and Safety folder.
- viii. Only the Health and Safety Program Coordinator will have administrator privileges to the in Public Drive/Admin/Health and Safety folder.
- ix. All employees can print documents from the in Public Drive/Admin/Health and Safety folder; however, upon printing the documents are assumed to be uncontrolled.
- x. The Site Health and Safety Plans must be returned upon project completion and new plans must be printed from the in Public Drive/Admin/Health and Safety folder or verified to ensure the current version is utilized.
- xi. Updates to existing manuals will be controlled and maintained by the Health and Safety Program Coordinator.

IV. Distribution

- a) A copy of this procedure is available in the ROSSCLAIR Health and Safety Manual.
- b) A copy of the Master Control Document list is available on the OHS shared folder.

V. Referenced Documents

- Master Document List
- Manual Controlled Document Page