ST. JOHN'S

NEWFOUNDLAND AND LABRADOR, CANADA

OCCUPATIONAL HEALTH & SAFETY PROGRAM

INTRODUCTION

The Occupational Health & Safety (OH&S) Program is a required document as per the Newfoundland and Labrador OH&S *Act* Section 36.1, and OH&S Regulations Section 12. The information outlined in this document directly coincide with the requirements of an OH&S Program as dictated in the OH&S *Act*, OH&S Regulations, WorkplaceNL PRIME Path 2 criteria, and the Workplace Health, Safety and Compensation *Act*.

The purpose and intent of this document developed by the City of St. John's (hereinafter referred to as the "City" or the "employer") is to protect the health and safety of the City's Workers, Contractors, and Visitors. The OH&S Program will also assist in preventing incidents, increasing efficiency of operations, and reducing the costs associated with occupational accidents and illnesses.

In an effort to provide a safe and healthy workplace free from recognized hazards, standards such as the Newfoundland and Labrador OH&S *Act* and Regulations, the Canadian Standards Association (CSA), the National Fire Protection Association (NFPA), and the American National Standards Institute (ANSI) are adopted, as appropriate, to aid in the goal of an injury and illness free environment. The information set forth in this OH&S Program are the minimum standard requirements and shall apply to all Managers, Supervisors and Workers employed with the City. In addition, the standards set forth in this OH&S Program will apply to any Contractor hired by the City, unless the Contractor's OH&S Program is superior.

The OH&S Program will be reviewed and updated at a minimum of **every three (3) years**, or when there is a change of work practices that may affect the health and safety of Workers, Contractors, and/or Visitors.

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ELEMENT 1 – LEADERSHIP COMMITMENT

LEADERSHIP COMMITMENT

The City is committed to providing a safe a healthy work environment for all Workers, Contractors, and Visitors. All provincially regulated Employers are required to comply with the Newfoundland and Labrador OH&S *Act* and Regulations which is governed by the OH&S Division of Digital Government and ServiceNL.

To ensure a healthy and safe workplace, it is imperative that everyone within all levels of the organization, understand their roles and responsibilities in OH&S.

RESPONSIBILITIES

Management

"Management" (or **"Managers"**) means Workers who hold delegated authority to direct City operations and who carry overall accountability for OH&S within their area of responsibility, including allocating resources, establishing expectations and ensuring compliance. Management includes the City Manager, Deputy City Managers, Department Heads, Directors and Managers. Management does not include non-Management Supervisors. Where a Manager also acts as a Supervisor, that individual shall meet the requirements assigned to both roles.

Managers are responsible for:

- Implementing and communicating the requirements set forth in the OH&S Program.
- Abiding by the Newfoundland and Labrador OH&S *Act* and Regulations.
- Ensuring safe work practices and procedures are developed.
- Providing Workers with access to the Newfoundland and Labrador OH&S *Act* and Regulations.
- Participating in incident investigations, and Incident Investigation Reports and ensuring implementation of corrective measures.
- Ensuring Workers have access to and complete the education and training required to perform their duties safely.
- Cooperating with OH&S Committees and WH&S Representatives.
- Responding in writing (within 30 days) to a recommendation of the OH&S Committee/WH&S Representative.
- Providing and maintaining a workplace with necessary equipment, systems and tools that are safe and without risk to workers.
- Ensuring the necessary personal protective equipment and devices are provided.
- Ensuring all Workers are made aware of the health and safety hazards which they may encounter in the workplace.
- Maintaining communication with Occupational Health & Safety regarding health and safety concerns.
- Divisions must file and manage all health and safety documentation internally. Documentation includes, but is not limited to:
    - Inspection records or directives issued by an OH&S Officer and/or external auditor.
    - Worker health and safety orientation records.

  - Contractor health and safety records.
  - Site specific safety plans.
  - Training records.
  - Workplace inspections.
  - Incident investigation reports.
  - Hazard assessments.
  - Safe work practices and procedures.
  - Emergency Response Plans.
- Fostering a psychologically safe workplace where workers feel valued and respected.
- Leading by example and following all safe work practices and procedures.

Supervisors

"Supervisors" means the individuals within Management with authority over a particular area, shift or Worker, including such positions as Forepersons, Operation Assistants, Superintendents, and other positions of authority; and also includes non-Management Supervisors, e.g., individuals in authority over a particular area or shift in accordance with Occupational Health and Safety legislation, including such positions as Lieutenants, Captains, Lead Hands, Program Assistants and et cetera.

Supervisors are responsible for:

- Implementing and communicating the requirements set forth in the OH&S Program.
- Abiding by the Newfoundland and Labrador OH&S *Act* and Regulations.
- Reporting health and safety concerns to Management.
- Providing Workers with access to the Newfoundland and Labrador OH&S *Act* and Regulations.
- Developing and communicating safe work practices and procedures to Workers in their area of responsibility.
- Ensuring the necessary personal protective equipment and devices are used for the health and safety of Workers.
- Ensuring all Workers are made aware of the health and safety hazards which they may encounter in the workplace.
- Cooperating with OH&S Committees and WH&S Representatives.
- Responding in writing (within 30 days) to a recommendation of the OH&S Committee/WH&S Representative.
- Maintaining communication with Occupational Health & Safety regarding health and safety concerns.
- Fostering a psychologically safe workplace where workers feel valued and respected.
- Leading by example and following all safe work practices and procedures

Occupational Health & Safety

The Occupational Health & Safety (OH&S) group within the Human Resources Department has developed and implemented the City's OH&S Program. OH&S is responsible for:

- Monitoring the City's OH&S Program to ensure its effectiveness.

- Ensuring the OH&S Program elements are reviewed, and updated as necessary, at a minimum of every 3 years.
- Reviewing the City's OH&S Policy annually.
- Developing and monitoring health and safety goals and objectives for high risk Departments/Divisions.
- Performing internal audits, as necessary, to ensure Departments/Divisions are abiding by legislative requirements.
- Making recommendations to Management regarding the health, safety, and welfare or Workers.
- Advising Management and Workers on the legislative requirements pertaining to their scope of work.
- Monitoring OH&S Committee meeting minutes on WorkplaceNL Connect.
- Reviewing health and safety documentation submitted by Departments/Divisions.
- Compiling health and safety statistics to identify leading and lagging indicators.
- Providing guidance to Management and OH&S Committees/WH&S Representatives on right to refuse work situations.
- Providing health and safety training to Workers, as necessary.
- Reviewing Incident Investigation Reports and advising on corrective actions to be implemented.
- Aiding Management in the development of safe work practices and procedures.
- Fostering a psychologically safe workplace where Workers feel valued and respected.
- Leading by example and following all safe work practices and procedures.
- Any other responsibilities deemed necessary by the City's Senior Leadership Team.

Workers

"Worker" means any person employed by the City as a permanent, term, part-time, casual, seasonal, temporary or student Worker and members of Council. Workers are responsible for:

- Complying with the Newfoundland and Labrador OH&S *Act* and Regulations and the City's OH&S Program.
- Taking reasonable care to protect their own safety, their co-worker's safety, and the safety of other persons at or near the workplace.
- Not carrying out work where there exists an imminent danger to their health and safety or the health and safety of another person.
- Using devices and personal protective equipment as directed by Management.
- Reporting hazardous conditions to Management immediately.
- Reporting incidents to Management immediately.
- Following safe work practices and procedures.
- Ensuring the job task is understood prior to carrying out work.
- Completing required health and safety forms as directed by Management.
- Providing honest feedback on health and safety surveys and questioners.
- Abiding by the City's Code of Conduct.
- Notifying Management when absent from work or leaving work early in case a work-related emergency occurs (e.g., fire drill, shelter in place, etc.).
- Attending health and safety training when scheduled.

- Participating in incident investigations, workplace inspections, and meetings related to health and safety when asked.
- Treating co-workers with respect and following the City's Respectful Workplace Policy.

Contractors

"Contractor" means an individual or business that performs work for the City under a contract, including Subcontractors. Contractors are responsible for:

- Abiding by the Newfoundland and Labrador OH&S *Act* and Regulations.
- Complying with the City's OH&S Program, Contractor Safety Program, and applicable safe work practices and procedures.
- Ensuring their Workers and subcontractors are provided with tools and equipment that are in safe working condition.
- Ensuring their Workers and Subcontractors are provided with appropriate training (e.g., Fall Protection, Confined Space Entry, etc.).
- Providing the designated City Representative with all requested health and safety documentation prior to commencing work.
- Immediately report hazards and incidents to the designated City Representative.
- Any other responsibility deemed necessary by the City to ensure work is carried out safely.

Visitors

"Visitor" means any person who is not a Worker or Contractor and who enters a worksite or takes part in City work activities. Visitors are responsible for:

- Following the City's health and safety practices and procedures.
- Wearing personal protective equipment, as required.
- Completing Visitor logbooks, sign in/out sheets, as required.
- Taking notice of warning signs, emergency response equipment (e.g., fire extinguisher, first aid kit), and the nearest emergency exit.
- Reporting hazards and incidents to a City representative immediately.

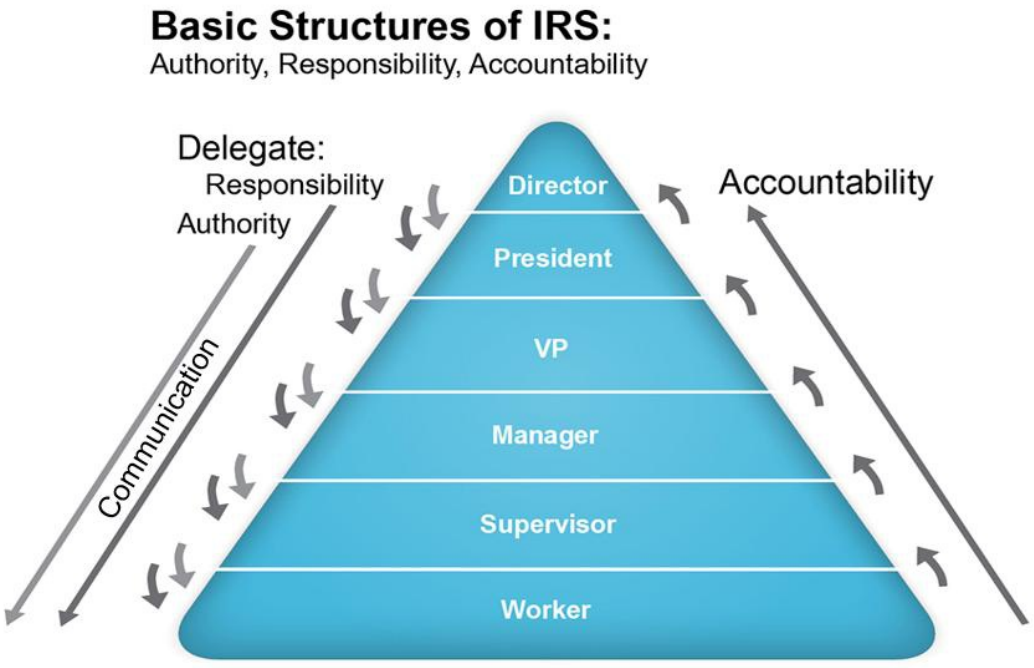
INTERNAL RESPONSIBILITY SYSTEM

The underlying philosophy of OH&S legislation in all Canadian jurisdictions is the Internal Responsibility System (IRS). It is the belief that everyone in the organization has a role to play to ensure workplace safety. It promotes communication among all parties and a framework regarding authority, responsibility, and accountability for OH&S.

The goal of the IRS is to have all Workers working together to identify hazards. Its ultimate objective is to ensure everyone integrates health and safety into their work.

Advantages to recognizing and adopting the IRS include:

- Places responsibility for controlling hazards on those in the workplace, making everyone a contributor to workplace health and safety.
- Applies everyone's knowledge to improve health and safety.
- Encourages Managers, Supervisors and Workers to take joint action to identify and control hazards through co-management of health and safety.
- Promotes cooperation and motivates everyone to protect their health and safety and that of their fellow Workers.



DUE DILIGENCE

"Due Diligence" means the level of judgement, care, prudence, determination, and activity that a person would reasonably be expected to do under circumstances. By proving Due Diligence, it means that you have taken all reasonable precautions to prevents incidents, injuries, and illnesses.

As a legal defense, being able to prove Due Diligence is important for a person charged under OH&S legislation. Employers, Managers, Supervisors and even workers **can be charged** and more than one person in the workplace can be charged for the same offense. If charged, person(s) may be found not guilty if they can prove that Due Diligence was exercised.

Due Diligence includes the following components:

1. **Reasonable precautions** – Refers to the care, caution, or action a reasonable person is expected to take under similar circumstances.
2. **Reasonably practicable** – Taking precautions that are not only possible, but that are also suitable or rational, given the situation.

Four cornerstones of Due Diligence:

1. **Information** – Ensure information is communicated, shared, and documented.
2. **Training** – Ensure Workers are trained and competent in the work being completed.
3. **Instruction** – Ensure Workers receive the appropriate level of instruction and education.
4. **Supervision** – Ensure correction of unsafe behaviour.

Questions regarding Due Diligence can be directed to Occupational Health & Safety.

Examples on how to prove Due Diligence in the workplace:

- Abide by the Newfoundland & Labrador OH&S Act and Regulations and the City's OH&S Program.
- Follow safe work practices and procedures.
- Complete hazard assessments including Field Level Risk Assessments. Ensure all forms of hazard assessments are documented, communicated, and signed by appropriate workplace parties.
- Complete safety forms and ensure they do not get misplaced (e.g., Fall Protection Plans, Confined Space Entry Permits, Workplace Inspections, pre-use inspections, vehicle inspections, etc.).
- Have regular safety meetings and ensure they are documented and signed by appropriate workplace parties.
- Ensure safety training is up to date and certifications are not expired.
- Document and communicate health and safety concerns.
- For OH&S Committees, follow an agenda during meetings.
- Always follow the manufactures recommendations and maintenance requirements.
- Ensure proper chemical handling procedures are in place and safety data sheets are communicated to Workers for the chemicals they use.
- Tag and take out of use defective equipment and don't allow it to be used until it is replaced or fixed as per the manufacturers requirements.
- Complete Incident Investigation Reports and ensure appropriate corrective actions are in place.

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ELEMENT 2 – HAZARD RECOGNITION, EVALUATION & CONTROL

HAZARD RECOGNITION, EVALUATION & CONTROL

The OH&S *Act* requires all employers to ensure workers are familiar with health and safety hazards to which they are exposed to while at work. The legislation also required a system for the recognition, evaluation, and control of hazards. Workplace hazards exist in all occupations across every department.

RESPONSIBILITIES

The City is committed to protecting its Workers, Contractors, and Visitors by implementing controls to identify existing and potential hazards within the workplace. This includes examining work tasks, machinery, equipment, tools, work practices, environmental conditions, and routine and non-routine operations.

Managers are responsible for:

- Enforcing the City's policies and procedures.
- Ensuring hazards that have a potential to jeopardize the health and safety of Workers are identified in the workplace.
- Participating in and reviewing hazard assessments.
- Ensuring controls are implemented for identified hazards.
- Liaising with Occupational Health & Safety, as needed, during the hazard assessment process.
- Maintaining well-organized documentation of all hazard assessments conducted.

Supervisors are responsible for:

- Ensuring hazards that have a potential to jeopardize the health and safety of Workers are identified in the workplace.
- Communicating present and potential hazards to workplace parties before work or tasks begin.
- Ensuring that the identified hazards are eliminated and, where this is not practical, ensure these hazards are controlled and Workers are protected from the hazards.
- Conducting hazard assessments prior to all new projects, jobs, or processes and ensure they are readily available for review by Workers.
- Participating in workplace inspections (both formal and informal).
- Implementing controls to identified hazards.
- Following up on hazard controls implemented.
- Enforcing the City's policies and procedures.
- Liaising with Occupational Health & Safety, as needed, during the hazard assessment process.
- Maintaining well-organized documentation of all hazard assessments conducted.

Workers are responsible for:

- Reporting a known or potential hazard to their Supervisor.
- Participating in hazard assessments.
- Assisting in the development and implementation of hazard controls within the workplace.
- Following the City's policies and procedures.

OH&S Committees/WH&S Representatives are responsible for:

- Accepting and reviewing hazard reports.
- Assisting in the development and implementation of hazard controls within the workplace.
- Identifying aspects of the workplace that may be unhealthy or unsafe.
- Participating in regular workplace inspections (both formal and informal).
- Following up on hazard controls.

Occupational Health & Safety are responsible for:

- Regularly communicating with Managers and Supervisors to ensure hazard assessments are being completed.
- Ensuring hazard assessments are being maintained and organized.
- Educating and training Workers in the hazard recognition, evaluation and control process.

Contractors are responsible for immediately reporting any known or suspected hazard to a representative of the City. Before beginning any work, Contractors must follow their own company's hazard recognition, evaluation, and control processes. If their company does not have such a process in place, they will be required to adhere to the City's procedures. Contractor evaluation and monitoring will be conducted through a combination of the following:

- A Contractor orientation.
- The City's Contractor Safety Program.
- A review of the contractor's safety records throughout the duration of the project.

Visitors are responsible for immediately reporting a known or suspected hazard to a City representative.

HAZARD RECOGNITION

A hazard is a condition, substance, behavior, or practice with the potential to cause loss due to injury, illness, or property damage. Recognizing hazards is the first step in preventing illness, injury, and property damage in the workplace.

The ability to adequately recognize hazards strengthens the OH&S Program by:

- Preventing or reducing illness, injury, and property damage.
- Increasing productivity.
- Reinforcing the City's commitment to creating and maintaining a positive health and safety culture in the workplace.
- Meeting legislative requirements.

The City uses the following methods to recognize hazards:

Worker Concerns:
Workers may have concerns about hazards at any time. All Workers are responsible for reporting existing or potential hazards to their Supervisor, their OH&S Advisor, or the OH&S Committee/WH&S Representative immediately.

Hazard Recognition (Form and QR Code):
When Workers observe an existing or potential hazard they are encouraged to complete a Hazard Recognition Form and submit the form to safety@stjohns.ca or scan the hazard identification QR code to report a hazard. At the end of each month, Occupational Health & Safety will randomly draw one name from Workers who submitted a hazard recognition for a random monthly prize.

Safe Behaviour Observation (Form and QR Code):
When Workers observe their co-worker(s) performing work safely (e.g., using proper lifting techniques, three-point contact while on ladder, properly using fall protection equipment, utilizing lifting aids properly, using proper ergonomic desk set-up, etc.) they are encouraged to report the Safe Behaviour Observation by using the Safe Behaviour Observation Form or scanning the hazard identification QR code.

Workplace Inspections:
Workplace inspections, both formal and informal, are an important method of recognizing hazards.

Hazard Assessments:
Every department is responsible for developing hazard assessments. Hazard assessments must look at all aspects of the work task and consider:

- Maintenance.
- Repairs.
- Cleaning.
- Past incident records.
- PPE requirements.

- "Off-site" activities such as driving to the worksite or working with contractors, visitors or the public.
- Conditions such as weather, lighting, and time of day.
- Musculoskeletal injury risk factors.
- Psychological health and safety risk factors.
- Workplace violence and harassment risk factors.

Steps in developing a hazard assessment:

1. List the steps of the task.
2. Identify the hazards.
3. Complete the risk evaluation.
4. Prioritize hazards.
5. Identify and implement hazard controls.
6. Communicate hazard assessment to appropriate Workers. This communication must be formally documented, either through signing the hazard assessment or by conducting a safety meeting.
7. Follow up on hazard controls to ensure they are effective.

Field Level Risk Assessment (FLRA):

A FLRA is a process used to identify, evaluate, and control risks that are specific to a particular task, location, or activity right before work commences rather than relying a general or pre-planned hazard assessment. FLRA's are an on the spot safety check done in the field to ensure hazards are identified and controlled.

The FLRA form (or approved variation) must be completed on site by Workers and submitted to management at the end of the shift. FLRAs must be completed when performing the following work activities, including but not limited to:

- Traffic and road activities.
- Lock out/tag out.
- Confined space entry.
- Working at heights.
- Building construction, renovation, and maintenance.
- Performing hot work.
- WHMIS/chemical handling.
- Trenching and excavation.

Incident Investigations:

Information collected from an investigation is an important method of identifying hazards. Investigations are necessary to gather information on the root causes of an incident that may have caused an illness, injury, or damage to property.

Records Examination:

Occupational Health & Safety will examine hazard reporting records to identify patterns, trends, and frequencies.

TYPES OF HAZARDS

Safety Hazards:
These are the most common and will be present in most workplaces at one time or another. They include unsafe condition that can cause injury, illness and death.

Examples of safety hazards include, but are not limited to:

- Poor housekeeping.
- Working at heights.
- Slips, trips, and falls.
- Working in confined spaces.
- Poor maintenance.
- Handling hazardous chemicals.
- Absence of guards on machinery, tools, and equipment.
- Working alone.
- Workplace violence.
- Dealing with animals.
- Dealing with Contractors, Visitors, and/or the public.
- Electrical hazards such as working near power lines and faulty wiring in public infrastructure.
- Operating heavy equipment.
- Working in extreme weather conditions.

Health Hazards:
Health hazards are often not seen or noticed in the workplace like safety hazards because often their effects are delayed. Exposure to health hazards may result in an illness or disease.

Examples of health hazards include, but are not limited to:

- Chemical (gases, vapors, dust, solvents, fumes, smoke).
- Physical (noise, temperature, radiation, indoor air quality).
- Biological (bacteria, viruses, blood-borne pathogens, fungus and moulds, parasites).
- MSI/ergonomic.

Psychological Hazards:
Workplace factors that can harm a Worker's mental health, well-being, emotional stability, and overall psychological functioning. They are conditions, practices, or exposures in an environment that increase the risk of stress, anxiety, burnout, trauma, or other mental health issues.

Examples of psychological hazards include, but are not limited to:

- Unrealistic workload and deadlines.
- Long working hours without breaks.
- Workplace bullying and harassment.
- Conflicting instructions from Managers and Supervisors and uncertainty about responsibilities.
- Work-life imbalances.

HAZARD EVALUATION

When the hazards have been identified or anticipated, they must be evaluated based on risk. Risk is the potential loss to people, equipment, materials, and the environment.

Hazard evaluations will enable the determination of appropriate controls. The City has adapted the following evaluation for hazards:

RISK = PROBABILITY + SEVERITY + FREQUENCY

Probability:
How likely is it, that this hazard will cause an incident?

1 – Unlikely to occur.	2 – Likely to occur.	3 – Will occur, if not controlled.

Severity:
If the hazard were to cause an incident, how severe are the consequences?

1 – First aid/minor property damage.	2 – Lost time injury/significant property damage.	3 – Fatality/permanent disability/major property damage.

Frequency:
How frequently is a Worker exposed to this hazard?

1 - <10% of the job.	2 – 10%-49% of the job.	3 – 50%-100% of the job.

The resulting calculation will be the basis for ranking hazards. It is important to note that this calculation must be completed for hazards before controls are implemented and after controls are implemented. Once all hazards have been ranked, they will fall into once of the three ranking categories:

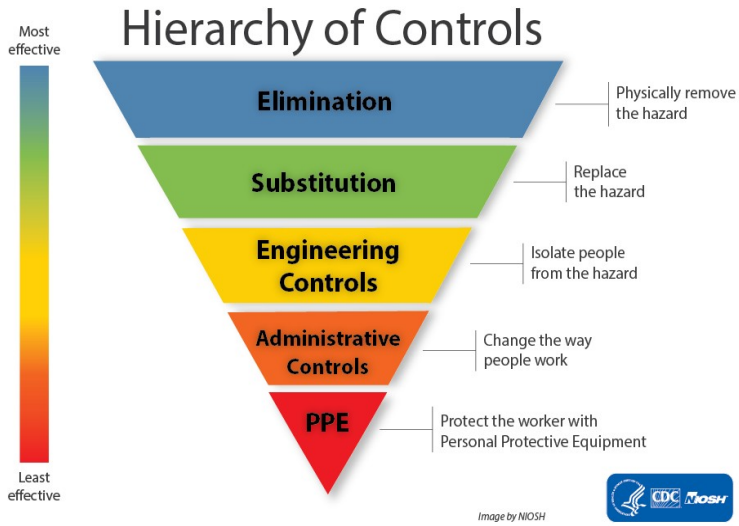
Low Risk (3 or 4):
The job can continue but monitor regularly. Controls will be implemented as needed.

Medium Risk (5 or 6):
The job can keep going at the discretion of the manager/supervisor. However, controls must be developed and implemented as soon as possible.

High Risk (7 to 9):
Stop the process immediately. Investigate the job and implement controls immediately.

HAZARD CONTROLS

The City is committed to implementing effective controls to help prevent incidents and minimize their impact to people, equipment, materials, and the environment. Managers, Supervisors and workers are responsible for participating in and developing hazard assessments that applies the hierarchy of controls to determine appropriate measures for identified hazards.



Elimination:
The most effective hazard control. By eliminating the hazard, you are removing the possibility of Worker injury or illness. For example, redesigning the work area so materials are delivered directly to where they're needed, removing the need to carry heavy loads.

Substitution:
Replacing the hazard. If elimination is not practical, try substituting or replacing one substance or process with another. For example, using a less toxic, environmentally friendly cleaning agent instead of a strong toxic chemical like bleach.

Engineering:
Isolate people from the hazard. Engineering controls generally deal with installing or modifying equipment that physically controls the hazard. For example, installing security glass and key card access to prevent workplace violence.

Administrative:
Changing the way people work. Administrative controls generally deal with directing the activities of people by managing how hazardous work is done. For example, pre-screening Workers to ensure they have the capabilities to perform the task.

Personal Protective Equipment (PPE):
Protects the Worker by reducing the severity of exposure to the hazard. PPE should only be used to supplement engineering and administrative controls and not as a substitute for either.

RESOURCES

All resources can be located on the St. John's Intranet webpage and OH&S boards.

Forms:

- Hazard Recognition Form
- Safe Behaviour Observation Form
- Field Level Risk Assessment
- Hazard Assessment Form

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ELEMENT 3 – INCIDENT REPORTING AND INVESTIGATION

INCIDENT REPORTING AND INVESTIGATION

Incident reporting and investigation provides a mechanism for the recognition, evaluation, and control of workplace hazards. Incident investigations are a fact-finding process to determine the underlying or root cause(s) and implement recommendations and corrective actions. All incidents and near-misses shall be reported and investigated in accordance with the information outlined in this element.

DEFINITIONS

Incident:
An undesired event that results in harm to a person or damage to property or under slightly different circumstances, could have resulted in personal harm, property damage or loss.

Near miss:
An unplanned incident that under slightly different circumstances could have resulted in injury to a person or damage to or loss of, equipment, material, quality, product, process, equipment, or the environment.

Substantial near miss:
An unplanned incident that under slightly different circumstances could have resulted in serious harm, major damage, or a significant negative outcome. It's stronger than a "near miss" because the potential consequences are substantial.

Immediate cause:
Most visible and direct reason for an incident. Events or actions that caused the incident. Often the easiest to identify as the event led directly to the incident.

Root cause:
Underlying factor or factors that lead to an incident. Identifying the root cause is crucial because it allows organizations to address the actual issues rather than just treating the immediate causes. Identifying the root cause is a necessary approach to help prevent similar incidents from occurring in the future.

First aid:
Results in treatment from a first aid kit, first aid kit and/or an Occupational Health Nurse.

Medical aid:
Results in a visit to a physician, during or after work hours, that does not result in any lost time beyond the date of occurrence.

Lost time:
Results in absence from work beyond the date of injury.

5 Whys Analysis:
Incident investigation technique used to identify the root cause of an issue by repeatedly asking "why?" – typically five times (though it can be more or fewer).

RESPONSIBILITIES

The City must develop and implement procedures for the investigation of all incidents and near misses and hold management accountable for the overall safety performance.

Managers are responsible for:

- The accountability of the overall safety performance of the City.
- Cooperating with the Incident Investigation Team.
- Providing resources for training in incident investigations in consultation with Occupational Health & Safety.
- Supporting the incident investigation process and ensuring the availability of any resources that are required to complete the investigation.
- Completing an incident notification within 24 hours. An incident notification can be emailed to an OH&S Advisor, or by emailing safety@stjohns.ca.
- Ensuring Incident Investigation Reports (IIRs) are being completed. IIRs must be completed within 72 hours.
- Contacting Colonial Insurance Adjusters for vehicle incidents.
- Ensuring corrective actions are completed, where necessary.

Supervisors are responsible for:

- Managing the scene of any incident that results in a serious injury to minimize the consequences of the incident, protect others at the scene, and preserve the scene for the investigation.
- Determining if alcohol and drug testing is required in consultation with the Manager and/or Occupational Health & Safety.
- Cooperating with the incident investigation team.
- Supporting the incident investigation process and making available any resources that are required to complete the investigation.
- Notifying the Manager of an incident. Supervisors can complete the incident notification if directed to do so by the Manager.
- Preparing and completing the IIR with support from the Incident Investigation Team. The IIR must be completed within 72 hours.
- Communicating findings from the IIR to all applicable Workers. This communication must be documented in a safety meeting and signed off by all Workers in attendance and forwarded to Occupational Health & Safety.
- Monitoring recommendations and corrective actions with support from the OH&S Committee/WH&S Representative.
- Notifying the OH&S Committee/WH&S Representative if a serious injury occurs.
- Completing Form 7 and submitting it to the Disability Case Manager immediately.

Workers are responsible for:

- Immediately reporting all incidents to the Supervisor. If an injury occurs, the Supervisor must be notified prior to seeking medical attention whenever possible.
- Participating in incident investigation training (when asked).

- Reporting early warning signs and symptoms of injury or disease to the Supervisor.
- Participating in the IIR (when asked).
- Cooperating with Managers, Supervisors and the Incident Investigation Team during the incident investigation process.
- Participating in the drug and alcohol testing process when directed to do so.
- Remaining attentive and respectful when Supervisors discuss recommendations, corrective actions, and lessons learned from incident investigations – even if you are not directly involved in the incident.
- Maintaining communication with the City's Disability Management team if you are unable to return to work due to an injury.

OH&S Committees/WH&S Representatives are responsible for:

- Participating in the IIR (when asked).
- Participating in incident investigation training (when asked).
- Reviewing IIR's and offering recommendations.
- Supporting Managers and Supervisors in the incident investigation process.
- Monitoring recommendations and corrective actions to ensure they are completed. For OH&S Committee's, the recommendations and corrective actions must be communicated on the meeting minutes.

OH&S Advisors are responsible for:

- Monitoring the incident reporting and investigation process. Ensure IIR's are being completed.
- Providing guidance and support to Managers, Supervisors, and Workers.
- Tracking incident statistics and records across all departments.
- Monitoring leading and lagging indicators.
- Maintaining records.
- Immediately contacting Digital Government and Service NL's OH&S Division if a serious incident occurs.
- Ensuring all departments are aware of corrective actions from incidents.

Disability Management Team is responsible for:

- Contacting injured Workers immediately following the notification of a medical aid or lost time incident.
- Reviewing Form 7 and submitting it to WorkplaceNL within three days of the injury.
- Advising Workers to report the incident to their health care provider and get copies of all necessary forms (e.g., Form MD, Chiropractors Report (8/10c), Physio Report).
- Supporting Managers, Supervisors, the Incident Investigation Team, and OH&S Advisors during the incident investigation.
- Assisting injured Workers in accordance with the City's policies and procedures.

Contractors and Visitors are responsible for:

- Reporting incidents to the Project Manager or City Representative.
- Participating in the incident investigation process (when asked).

Incident Investigation Team

The City's Incident Investigation Team will be made up of members assigned to examine an incident. The Incident Investigation Team members will include, at a minimum, the Supervisor and OHS Advisors. For more significant incidents, Workers, OH&S Committee members/WH&S Representatives, department representatives, Human Resource Representatives and Unions may be involved. The Incident Investigation Team will be comprised at the digression of the Supervisor in consultation with OH&S Advisors.

Incident Investigation Team members are responsible for:

- Participating in incident investigation training.
- Ensuring the incident investigation is being completed in accordance with the City's procedures.
- Remaining unbiased. Incident investigations are always a fact-finding process, not a fault-finding process.
- Completing the IIR within 72 hours.
- Analyzing information to determine the root cause(s) of the incident.
- Determining loss potential based on severity, probability and frequency.
- Developing recommendations, corrective actions, and lessons learned.

SERIOUS INJURIES

The City will operate in compliance with the OH&S *Act* and OH&S Regulations and ensure incidents resulting in serious injury or death, or any incident that have reasonable potential for serious injury or death, are **immediately reported to Digital Government and Service NL's OH&S division**. The City of will cooperate with any orders and timelines outlined by Service NL.

Supervisors must ensure that the scene of any incident that results in a serious injury or fatality is managed to minimize the consequence of the incident, protect others at the scene, and preserve the scene for investigation.

Occupational Health & Safety will notify Service NL of a serious injury, by using the numbers outlined below.

Daytime Incident Reporting Number:

- 1-709-729-2706

After Hours Incident Reporting Number:

- 1-709-729-4444

OH&S *Act* Section 54(3), "**serious injury**" means:

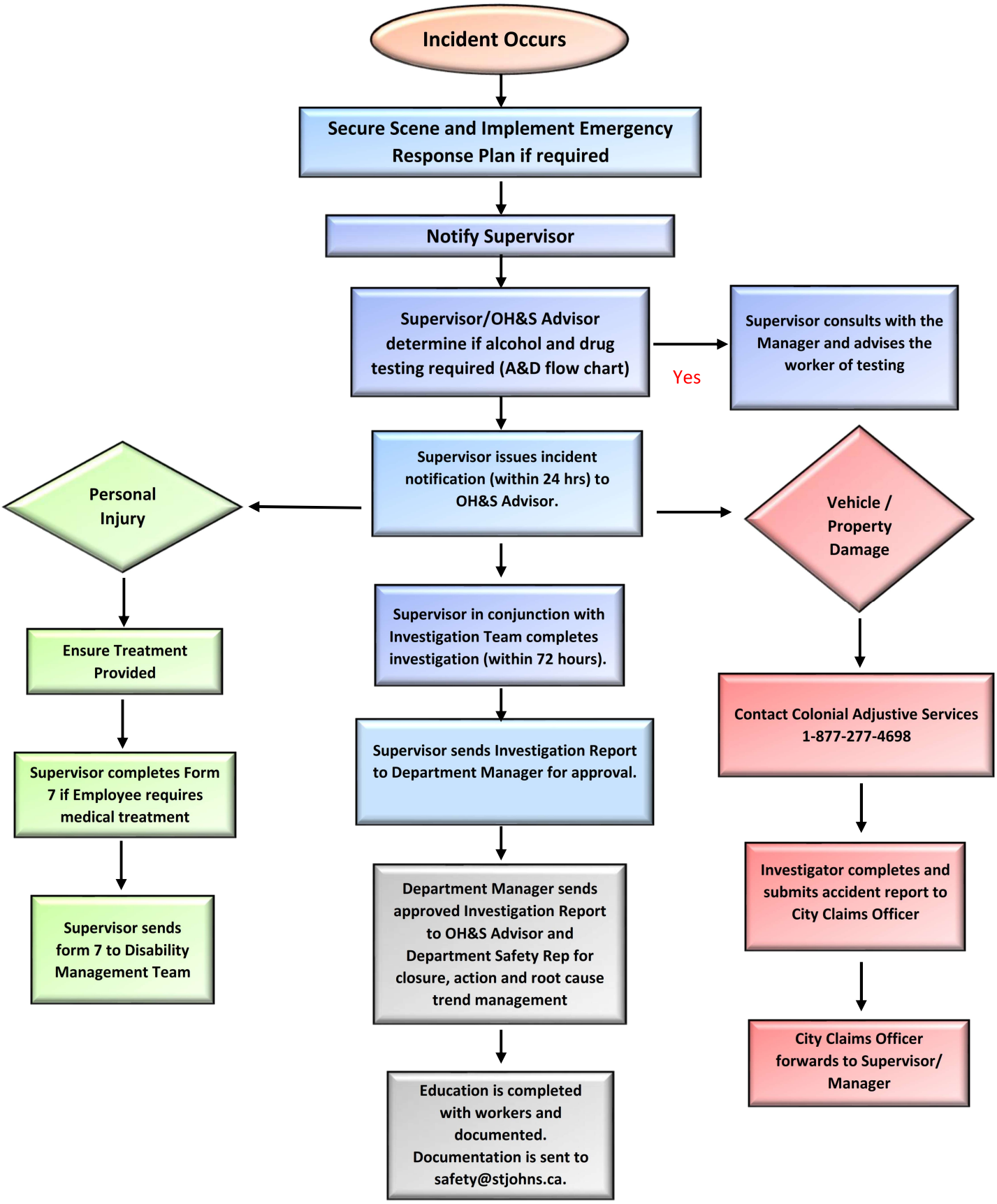
a) a fracture of the skull, spine, pelvis, femur, humerus, fibula or tibia, or radius or ulna;
b) an amputation of a major part of a hand or foot;
c) the loss of sight of an eye;
d) a serious internal haemorrhage;
e) a burn that requires medical attention;
f) an injury caused directly or indirectly by explosives;
g) an asphyxiation or poisoning by gas resulting in a partial or total loss of physical control; or
h) another injury likely to endanger life or cause permanent injury,

but does not include injuries to a worker of a nature that may be treated through first aid or medical treatment and the worker is able to return to work either immediately after the treatment or at the worker's next scheduled shift.

OH&S Regulations Section 10(1), "**serious injury**" means:

a) places life in jeopardy;
b) produces unconsciousness;
c) results in 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, foot, finger or toe;
f) consists of burns to a major portion of the body; or
g) causes the loss of sight in an eye.

INCIDENT NOTIFICATION FLOWCHAT



INCIDENT NOTIFICATION PROCESS

1) Incident occurs.
2) Worker immediately notifies their Supervisor.
3) The Manager or Supervisor goes to the incident location to manage the scene:
    - For serious injuries an ambulance must be contacted, and Digital Government and Service NL's OH&S division must be notified of the serious injury immediately.
    - If a vehicle is damaged, the Manager will contact Colonial Insurance Adjustors (1-833-899-5862). Follow flowchart on the City's intranet webpage for the vehicle damage process.
    - For medical aid and lost time injuries, the Disability Management Team must be notified prior to the end of the shift so the required WorkplaceNL forms can be submitted.
4) The Manager or Supervisor will initiate the incident notification by gathering information, taking pictures, conducting witness statements, and notifying an OH&S Advisor.
    - Calls made to an OH&S Advisor outside 9:00am–4:30pm, must be directed to 709-576-8080.
5) Using the A&D Testing Checklist, the Supervisor in consultation with an OH&S Advisor, as per the A&D Policy and Program, will determine if A&D testing is required.
6) The Manager or Supervisor will email a written incident notification **within 24 hours**. The incident notification must be emailed to the department/division assigned OH&S Advisor or emailed to safety@stjohns.ca.

INCIDENT INVESTIGATION (ROOT CAUSE ANALYSIS) PROCESS

1) The Incident Investigation Team will complete a thorough IIR **within 72 hours**. All sections of the IIR must be completed in its entirety.
2) When the IIR is completed, the Supervisor is responsible for reviewing the recommendations and corrective actions with appropriate Workers. This communication must be documented.
    - Copies of the IIR must be forwarded along to Occupational Health & Safety via safety@stjohns.ca for tracking and trending incident statistics.
3) The Manager and/or Supervisor will assign recommendations and corrective actions to appropriate workers with a date for competition and follow up.
4) Recommendations and corrective actions will be monitored by the Manager and/or Supervisor and the OH&S Committee/WH&S Representative to ensure they are complete and to determine their effectiveness.
5) City wide lessons learned with be communicated by Occupational Health & Safety across all applicable departments.

INCIDENT INVESTIGATION REPORT (IIR) REQUIREMENTS

The City is committed to completing effective IIR's to identify new and existing hazards and to prevent the reoccurrence of incidents. The City's IIR includes:

- The names of the people involved in the incident and the investigation.
- The date of the incident and the date the investigation was completed.

- Details of the incident, including the events leading up to the incident.
- The immediate and root cause(s) of the incident.
- Corrective action(s) to be taken, the person(s) responsible for the action(s) and a date for competition and follow up. Corrective actions will be assigned priority to make sure the highest risk(s) are eliminated or controlled first.

RISK REVIEW COMMITTEE

The City has established a Risk Review Committee. The purpose of the committee is to review and analyze incidents for all departments within the city and develop best practices and recommend actions to ensure that there are shared responsibilities to reduce loss, liability, and safety risk.

RESOURCES

All resources can be found on the St. John's Intranet webpage.

Forms

- Incident Notification Form
- Incident Investigation Report
- Witness Statement Form
- A&D Checklist
- WorkplaceNL Form 7, Employers Report of Injury
- WorkplaceNL Form 6, Workers Report of Injury

Flowcharts

- Vehicle Damage Reporting Process

ST. JOHN'S
NEWFOUNDLAND AND LABRADOR, CANADA

ELEMENT 4 – PERSONAL PROTECTIVE EQUIPMENT

PERSONAL PROTECTIVE EQUIPMENT

When a hazard assessment determines that personal protective equipment (PPE) is required, a process for the proper selection, use, inspection, cleaning, maintenance, storage and training of users is required. This procedure outlines the City's process for selection, use, inspection, cleaning, maintenance and storage of PPE. It will also outline the responsibilities and practices for the use of PPE whenever it has been identified as a risk control measure.

RESPONSIBILITIES

Managers are responsible for:

- Ensuring PPE procedures are in place and adhered to.
- Informing Supervisors and Workers that PPE must be CSA approved.
- Removing any worn, expired, faulty or damaged PPE from use and replacing as necessary.
- Providing and maintaining facilities and supplies required for cleaning a storage of PPE.
- Providing training to Supervisors and Workers including:
    - Where, when and what PPE is required; and
    - The inspection, cleaning, maintenance, storage, use and limitations of PPE.
- Providing leadership and setting a good example for workers in the use of PPE.

Supervisors are responsible for:

- Abiding by PPE procedures.
- Ensuring PPE selection is appropriate and complies with relevant CSA Standards.
- Ensuring that PPE is used properly, including providing information, training, instruction and supervision.
- Ensuring that reusable PPE (e.g., full face respirators) is kept clean, maintained and stored appropriately.
- Ensuring that inspections and maintenance is scheduled and carried out on PPE where required.
- Removing any worn, expired, faulty or damaged PPE from use and replaced.
- Providing leadership and setting a good example for workers in the use of PPE.

OH&S Committees/WH&S Representatives are responsible for:

- Consulting with Managers, Supervisors, and Workers on any PPE related concerns.
- Leading by example by wearing PPE.
- Promoting use and care of selected PPE throughout the workplace.
- Making recommendations to Managers and Supervisors on any PPE related concerns reported.
- Participating in the selection of PPE and undertake the required training in its use, maintenance and storage.

Workers are responsible for:

- Reporting incidents or concerns with PPE to the Supervisor.
- Using PPE as required for the work they are carrying out.
- Participating in the selection of PPE and undertake the required training in its use, maintenance and storage.

Contractors and Visitors are responsible for:

- Reporting incidents or concerns with PPE to a Project Manager or City Representative.
- Using PPE as required for the work they are carrying out.
- Participating in the selection of PPE and undertake the required training in its use, maintenance and storage, as necessary.

GUIDELINES

- PPE is required to be worn as per OH&S legislation and hazard assessments.
- All PPE must be CSA approved.
- PPE is to be used in conjunction with, and never to the exclusion of, other safe work practices and procedures.
- Workers must be trained in the PPE's use, care, and maintenance.
- PPE MUST be City issued. If not:
    - Managers must review to confirm it meets applicable OH&S specifications.
    - Contact Occupational Health & Safety for assistance if needed.
- Workers must use, care for, and maintain their PPE in accordance with legislative requirements and manufacturer standards.
- PPE must be inspected prior to use.
- PPE must not expose workers to unnecessary and avoidable hazards.
- PPE must be properly fitted for the individual.
- PPE is not permitted to be modified, unless the manufacturer standards allow.
- PPE that is damaged or needing repair must be removed from service and worker must notify manager/supervisor.

Protective Devices

All PPE must of a safe design and construction for the work being performed and shall be maintained in a sanitary and reliable condition. All PPE must be Canadian Standards Association (CSA) approved.

Personal Clothing

Personal clothing and accessories shall be in accordance with section 73(1) of the OH&S Regulations (e.g., not having loose clothing around moving parts or machinery, etc.)

Eye & Face Protection

Eye protection must be worn in accordance with section 75(2) of the OH&S Regulations. Prescription safety eyewear must meet the regulations of CSA Standard CAN/CSA Z94.3-92, "Industrial Eye and Face Protectors." Adequate precautions must be taken if a hazardous substance or condition may adversely affect a worker wearing contact lenses.

Head Protection

Head protection must be worm in accordance with Section 74(3) of the OH&S Regulations.

High Visible Apparel

Section 81(6) in the OH&S Regulations outlines the requirements for high viability apparel.

Foot Protection
Foot protection shall be worn in accordance with Section 80(1)-80(2) of the OH&S Regulations and meet the below specifics unless communicated differently by the Departmental Director:

- Minimum CSA Grade 1.
- The boot must clearly display both green CSA triangle symbol and the White Omega Symbol. (Must conform to the CSA Standard Z195-14).
- Must have an 8-inch lace up ankle (no slip-ons, no front zipper, no elastic on sides).
- Must be leather with a waterproof or water-resistant coating.
- Toe cap must be steel or polycarbonate composite.
- Must have a puncture resistant plate and slip resistant sole.

Limb and Body Protection
Limb and body protection shall be worn in in accordance with Section 78(5) of the OH&S Regulations. Additionally, workers operating a chain saw shall wear a leg protective device with a label permanently affixed to the outer surface indicating the standard it meets.

Respiratory Protection
Respiratory protection shall be worn in accordance with Section 84(1) of the OH&S Regulations.

Hand Protection
As per Section 78 of the Newfoundland and Labrador OH&S Regulations, where there is a danger of injury, contamination or infection to the worker's skin, hands, feet or body, the worker shall wear properly fitting protective equipment appropriate to the work being done and the hazards involved.

Hearing Protection
Hearing protection shall be worn in accordance with Section 68(1)(7) of the OH&S Regulations. When a worker is required to work in an area in which noise levels exceed the criteria for permissible noise exposure established by the ACGIH Noise Threshold Limit Values (TLVs) the employer shall first take appropriate action to reduce the noise to acceptable levels; and where it is not practicable to reduce the noise to acceptable levels or to isolate workers from the noise, the workers shall wear PPE in accordance with CSA Z94.2 "Hearing Protection Devices – Performance, Selection, Care, and Use."

Hearing protective devices may be either earplug or earmuff style, which meet the applicable standard and provide the desired level of protection from noise.

Cleaning and Maintenance
PPE must be kept clean and properly maintained. Inspection, cleaning, maintenance, storage, and use of PPE shall be in accordance with legislative requirements and the manufacturer's instructions.

Inclusive PPE
Inclusive PPE is essential for creating a safe and equitable work environment. Supervisors shall provide PPE to workers (as needed) to accommodate the diverse needs of the workforce, ensuring safety and comfort for all, regardless of gender, body shape, age, religion or disability.

ST. JOHN'S
NEWFOUNDLAND AND LABRADOR, CANADA

ELEMENT 5 – WORKPLACE INSPECTIONS

WORKPLACE INSEPCTIONS

The City is committed to the promotion of both formal and informal workplace inspections to ensure the health and safety of workers, contractors, visitors and the public. Workplace inspections are proactive opportunities to find and address hazards before they result in an incident.

As per the Newfoundland and Labrador OH&S Regulations, Section 18:

1) *"Regular inspections of all buildings, excavations, structures, machinery, equipment, work practices and places of employment shall be made by the employer or the employer's representative at intervals to ensure that safe working conditions are maintained and that unsafe conditions found as a result of the inspection are remedied without delay.*

2) *Where an unsafe condition is discovered by a person, it shall be reported as soon as practicable to a supervisor who shall ensure that appropriate action is taken, without delay, to prevent a worker from being injured.*

3) *Where emergency action is required to correct a condition that constitutes an immediate threat to workers, only those qualified and properly instructed workers necessary to correct the unsafe condition shall be exposed to the hazard and every possible effort shall be made to control the hazard while the corrective action is taking place."*

RESPONSIBILITIES

The City will carry out workplace inspections in accordance with the Newfoundland and Labrador OH&S Regulations.

Managers are responsible for:

- Ensuring workplace inspections are being completed, at a minimum, twice (2) per year.
- Reviewing completed inspection reports and coordinating with the OH&S Committee/WH&S Representative on corrective actions.
- Regularly conducting informal inspections and continuously monitor their workplaces for potential hazards.
- Ensuring a Preventative Maintenance Procedure is in place and up to date.

Supervisors are responsible for:

- Reviewing completed inspection reports and coordinating with the OH&S Committee/WH&S Representative on corrective actions.
- Monitoring the effectiveness of corrective actions.
- Regularly conducting informal inspections and continuously monitor their workplaces for potential hazards.
- Monitoring the Preventative Maintenance Procedure.

OH&S Committees/WH&S Representatives are responsible for:

- Participating in workplace inspections, at a minimum, twice (2) per year.
- Ensuring workplace inspection reports are communicated to the Supervisor and posted on the OH&S board(s).
- Making recommendations and following up to ensure that corrective actions are effective.

Workers are responsible for:

- Cooperating with persons carrying out workplace inspections.
- Reporting any potential hazards to the Supervisor.
- Reviewing workplace inspection reports.

Occupational Health & Safety are responsible for:

- Communicating workplace inspection requirements to Managers/Supervisors and OH&S Committees/WH&S Representatives.
- Reviewing completed workplace inspections and offering recommendations, if any.
- OH&S Advisors shall complete a minimum of one (1) workplace inspection per month in one of their respective departments/divisions.

TYPES OF INSPECTIONS

The inspections outlined on this page do not represent all OH&S inspections required to meet legislative requirements.

Managers and Supervisors are responsible for consulting the OH&S *Act* and Regulations, as well as the City's safe work practices and procedures, during job planning to ensure all necessary inspections are identified and implemented. For further guidance contact Occupational Health & Safety.

Formal Workplace Inspections:

- Formal workplace inspections are regularly scheduled examinations of the workplace conducted with the aid of a checklist.
- Formal workplace inspections must be completed, at a minimum, **twice (2) per year** by OH&S Committees/WH&S Representatives.

Informal Inspections:

- Informal inspections are a practiced visual awareness that identifies potential hazards of daily processes, conditions, and activities in the workplace.
- Managers/Supervisors, Workers, Contractors, and Visitors are encouraged to carry out informal inspections to stay aware of potential hazards, site conditions, and ongoing activities across all work locations.

Digital Government and ServiceNL Inspections:

- Special inspections are conducted by Digital Government and ServiceNL OH&S Officers upon request and with cooperation from Managers/Supervisors, OH&S Committees/WH&S Representatives, Workers, and all other personnel present on City property.

- Digital Government and ServiceNL OH&S inspections are performed to determine compliance with legislative requirements.

Floor Warden Inspections:

- Designated Floor Wardens are required to check emergency response items (e.g., emergency exits, first aid kit, fire extinguishers, etc.) **once (1) per month**.
- This inspection must be documented using the Floor Warden Checklist and submitted to the Supervisor for review.

OH&S Advisor Inspections:

- OH&S Advisors must complete a minimum of one (1) workplace inspection per month in one of their respective departments/divisions.
- The results of the inspection will be submitted to the OH&S Manager and department/division Manager/Supervisor.

Pre-Trip and Post-Trip Vehicle Inspections:

- Operators must complete a pre-trip and post-trip inspection using the vehicle logbook/checklist.
- Submit to Supervisors at the end of each shift if all items are in good condition.
- Notify Supervisor if deficiencies have been noted. Supervisor to send vehicle to Fleet for corrective action.

INSPECTION PROCEDURE

1. **Planning the Inspection**
   - Choose the location to be inspected.
   - Determine if PPE is required.
     - If yes, ensure it is worn.
   - Confirm the inspection team (OH&S Committee members/WH&S Representative, Workers, Supervisors, etc.).
   - The inspection team must have a copy of the Workplace Inspection Checklist.
   - The inspection team should review previous completed inspections for the area, and ask:
     - Is there anything to be aware of?
     - Have previous recommendations been implemented?

2. **Conducting the Inspection**
   - Observe the work practices to determine present and potential hazards.
     - Do not disrupt work processes.
   - Complete the Workplace Inspection Checklist and make note of identified issues.
   - Listen to workers concerns.
   - Take photos to highlight a particular issue.
   - Report high risk hazards to management immediately.
     - Stop work, if required.

3. Completing the Workplace Inspection Checklist

- Clearly state the area, time, date, and the people involved in the inspection.
- Note the hazards and their location.
- Prioritize each hazard using a risk evaluation as listed on the Workplace Inspection Checklist.
- Recommend corrective actions.
- Establish a target date for corrective action.
- Sign and date the checklist.
- Forward a copy of the completed checklist to the OH&S Committee/WH&S Representative and Supervisor.

4. Follow up and Monitor for Recommendations

- The Manager/Supervisor of the inspected area is required to address items noted from the inspection.
- The Manager/Supervisor shall assign corrective actions and expected completion dates and monitor corrective actions.
- The Manager/Supervisor shall notify the Inspection team of completion of corrective actions.
    - Notify if delays and expected completion.

PREVENTATIVE MAINTENANCE PROCEDURE

The City maintains an extensive inventory of tools, equipment, and machinery. The purpose of this procedure is to ensure all tools, equipment, and machinery are maintained in a safe, operational condition that protects workers, contractors, visitors, the public, and the environment. The minimum requirements for preventative maintenance are as follows:

1. Inventory and Documentation

Managers/supervisors are responsible for ensuring there is a master list of all tools, equipment, and machinery, which may include the following:

- The manufacture's manual.
- Model/serial numbers.
- Location.
- Maintenance history.

2. Maintenance Scheduling

Managers/supervisors are responsible for ensuring there is a developed maintenance schedule based on:

- Manufacture's recommendations.
- Operational usage.
- Historical maintenance data.
- Regulatory requirements.

3. Inspections and Maintenance Tasks

Managers/Supervisors are responsible for ensuring routine inspections are completed to identify wear, damage, or potential failures. Managers/Supervisors must ensure all tasks align with the manufacturer's instructions and safety standards.

RESOURCES

All resources can be found on the St. John's Intranet webpage.

Forms

- Workplace Inspection Checklist
- Floor Warden Checklist

Templates

- Preventative Maintenance Procedure Template

ST. JOHN'S
NEWFOUNDLAND AND LABRADOR, CANADA

ELEMENT 6 – SAFE WORK PRACTICES AND PROCEDURES

SAFE WORK PRACTICES AND PROCEDURES

This element outlines the requirements for developing, implementing, and maintaining safe work practices and procedures (SWPPs) to ensure the health and safety of all Workers, Contractors, Visitors, and the environment. SWPPs help prevent workplace incidents by providing clear guidance on how to perform tasks safely.

Having written SWPPs is an essential component of the City's OH&S Program.

Safe work practices are written methods outlining how to perform a task with minimum risk to people, equipment, materials, environment, and processes. They are general guidelines for workers, contractors, and visitors to follow and include the do's and don'ts.

Safe work procedures are a more detailed, in-depth look, into the various tasks that a worker, contractor, and/or visitor may need to complete. Safe work procedures are a written step by step analysis outlining the hazards of the job, and the safe steps to complete the job.

RESPONSIBILITIES

The City is responsible for ensuring adequate resources are available to develop, implement, review and update SWPPs.

Managers and Supervisors are responsible for:

- Developing and maintaining SWPPs using an approved City template. Once a SWPP is developed, it must be sent to Occupational Health & Safety for review.
- Ensuring compliance with legal and regulatory requirements.
- Providing education and training on SWPPs to all Workers, Contractors, and Visitors, as necessary.
- Ensuring Workers, Contractors, and Visitors understand and follow SWPPs.
- Ensuring appropriate PPE and equipment as referenced in SWPPs are provided to Workers, Contractors, and Visitors.
- Identifying when workers are required to work alone and implement a Working Alone Risk Assessment and Working Alone Procedure.

Workers are responsible for:

- Complying with SWPPs.
- Participating in education and training related to SWPPs.
- When requested, participate in the development of SWPPs.
- Reporting any changes to the task that may affect SWPPs.
- Using appropriate equipment and PPE as required.

OH&S Committees/WH&S Representatives are responsible for:

- Participating in the development and review of SWPPs.
- Identifying workplace hazards and recommending updates to SWPPs where required.

Occupational Health & Safety are responsible for:

- Assisting Managers/Supervisors in developing and maintaining SWPPs.
- Reviewing SWPPs.
- Ensuring compliance with legal and regulatory requirements.
- Ensuring SWPPs are published on the City's intranet webpage.

Contractors and Visitors are responsible for:

- Reviewing and complying with the City's SWPPs, as necessary.
- Reporting any hazards or unsafe conditions.
- Using appropriate equipment and PPE as directed.

HOW TO DEVELOP SAFE WORK PRACTICES AND PROCEDURES

When developing SWPPs, the first step to is identify tasks that require a written practice or procedure. It is recommended this is done by completing a hazard assessment to identify the hazards and controls for each step in a task.

It is important to engage Workers who understand the task when developing SWPPs. When undertaking new or unfamiliar tasks, it may be necessary to consult outside experts to ensure specialized knowledge is applied.

Instructions:

1. Use an approved SWPP template. The template can be accessed on the City's intranet webpage, by contacting your OH&S Advisor, or by emailing safety@stjohns.ca.
2. Review legislative requirements including the Newfoundland and Labrador OH&S *Act* and Regulations, manufacturer's manual (if applicable), WorkplaceNL resources, industry standards, and best practices. Reference legislative requirements, manufacturer's manual, industry standards, safety data sheets, etc., in the SWPP.
3. Identify if the SWPP is a practice or procedure. Remember, safe work practices are general guidelines (e.g., Dust Exposure, Extension Cords, Flu Prevention, etc.) whereas safe work procedures are step by step task analyses (e.g., Welding, Operating a Dump truck, Cleaning a Pool, etc.).
4. Engage Workers who are knowledgeable on the task. Where possible, it is best to visually observe the task and focus on the actions being performed.
5. Identify any tools, equipment, and materials that are being used.
6. List hazards associated with the task and applicable control measures using the hierarchy of controls.
7. Identify PPE requirements.
8. Finalize SWPP and send to Occupational Health & Safety for review – contact your OH&S Advisor or email the SWPP to safety@stjohns.ca.
9. After the SWPP is reviewed by Occupational Health & Safety, the Manager/Supervisor is responsible for educating and training Workers on the SWPP (e.g., Safety Meeting) including the potential risks and consequences of not following the SWPP. Records of education and training must be maintained.
10. The SWPP must be kept on file, published on the intranet webpage and accessible to all Workers.

CONTINUOUS IMPROVEMENT

Managers and Supervisors are responsible for developing and maintaining SWPPs to ensure they are up to date and effective. A review of SWPPs should occur whenever:

- The task/activity changes.
- When a new hazard is identified.
- When new equipment is added.
- After an incident occurs.
- There is a change to legislation or standards.
- SWPPs must be reviewed annually.

WORKING ALONE PROCEDURE

The City defines "working alone" as to "work in circumstances where assistance would not be readily available to the worker in case of an emergency, or in case the worker is injured or in ill health."

Other working alone circumstances would include:

- The workplace will not be frequented at any time by other personnel.
- Response capabilities during an emergency are not readily available.
- Notification for response in the event of an emergency is largely dependent on the worker who Is working alone (there is no other mechanism of emergency notification).

Managers and supervisors shall evaluate work tasks/activities on a case-by-case basis, and consider the following criteria:

- Whether there is a regulations, code, or existing policy that prohibits a worker from working alone on the task/activity being assigned.
- The tasks and hazard involved in the work being assessed.
- The consequences that may result from a worst-case scenario.
- Possible incidents that could prevent the worker from getting help.
- Whether there are any personal safety issues for individuals working alone after regular working hours.

Requirements for Working Alone:
Managers and Supervisors who authorize workers to "work alone" must ensure a Working Alone Risk Assessment is developed and a Working Alone Safe Work Procedure is completed. Where the risk assessment identifies a hazard, appropriate controls shall be implemented to eliminate or minimize the risk associated with the hazard.

Additionally, Managers and Supervisors must establish a check-in procedure that (SWPP must include):

1. Includes a designated contact person, or electronic device (e.g., app on phone) to establish contact with the Worker at pre-determined intervals and record the results.
2. Defines the time interval between checks and the procedure to follow in case the Worker cannot be contacted, including the provisions for emergency response.

3. Is developed in consultation with the Worker assigned to work alone and the OH&S Committee/WH&S Representative.
4. Is reviewed at least annually, or more frequently if there is a change in work arrangements that may adversely affect a Worker's well-being or safety, or a report that procedures are not working effectively.

Workers are required to provide feedback if the check-in procedure is not effective and if there are hazards present in the work area that are not identified in the risk assessment. Also, Workers are advised to bring forward concerns to their Supervisor if they are experiencing physical or psychological symptoms that would prevent them from working alone safely.

RESOURCES

All resources can be found on the St. John's Intranet webpage.

Forms

- Working Alone Risk Assessment
- Working Alone Check-In Procedure Form

Templates

- Safe Work Practice and Procedure Template
- Working Alone Procedure Template

ST. JOHN'S

NEWFOUNDLAND AND LABRADOR, CANADA

ELEMENT 7 – TRAINING AND COMMUNICATION

TRAINING AND COMMUNICATION

Health and safety training is essential because it equips Workers with the knowledge and skills needed to prevent incidents, reduce risks, and respond effectively in emergencies. Clear communication of health and safety concerns ensures that Workers, Contractors, and Visitors are aware of potential hazards and can take appropriate precautions to protect themselves and others. Together, proper training and open communication create a safer workplace culture, improving overall well-being and productivity.

RESPONSIBILITIES

The City will ensure Managers and Supervisors are provided with the resources to carry out training in accordance with the OH&S Act and Regulations.

Managers and Supervisors are responsible for:
Identifying and communicating specific job functions, safety requirements, and ensuring legitimacy of the training provided through accurate record keeping and evaluation. As safety training is provided, Supervisors have a responsibility to monitor a worker's job safety performance and identify areas that require further training.

Workers are responsible for:
Ensuring they are available for safety training provided by the City and should provide constructive feedback to Managers/Supervisors about the training received to assist in the evaluation process. If a worker is unable to attend mandatory training, they must notify their Manager/Supervisor immediately, so the training can be re-scheduled.

OH&S Committees/WH&S Representatives are responsible for:
Reviewing training and education initiatives and provide feedback to Managers, Supervisors, and Occupational Health & Safety.

Occupational Health & Safety are responsible for:
Monitoring the training and communication requirements outlined in the OH&S Program and advise Managers and Supervisors on legislative training requirements and industry standards.

Contractors are responsible for:
Ensuring their workers and sub-contractors have the mandatory training set forth in the OH&S *Act* and Regulations and adhere to the City's training requirements.

Visitors are responsible for:
While visitors typically do not undergo full safety training, they are still expected to follow certain guidelines to ensure their safety and that of others. These guidelines include; follow all instructions of their escort while on City property, obey any safety related warnings and/or requirements posted throughout the facility, be mindful of emergency exits and emergency response equipment, and wear appropriate PPE when required.

TRAINING REQUIREMENTS

The City will provide applicable and appropriate health and safety training to Managers, Supervisors and Workers. The training courses that Managers, Supervisors and Workers shall attend will depend on their specific job functions and associated hazards. Training requirements will be determined in accordance with the OH&S *Act* and Regulations, including industry standards.

Legislative and City required training will be monitored by Divisional Managers and Supervisors in consultation with Occupational Health & Safety by means of WorkplaceNL's Certification training Registry (CTR) and documented training matrixes.

Occupational Health & Safety has developed a Training Matrix template. Occupational Health and Safety will periodically audit departments/divisions to ensure Worker's training is up to date.

Orientation
All Workers are required to complete an orientation. The City's orientation is composed of two components; review of policies and procedures and a site tour of the facility.

On-The-Job Training
Supervisors are committed to providing on-the-job training. On-the-job training provides an opportunity to evaluate a Worker's specific job function and incorporate practical knowledge and skills necessary to perform a job task in a safe and efficient manner. On-the-job training topics include, but are not limited to:

- Approved safe work practices and procedures.
- Equipment operations.
- Proper use of tools, equipment, PPE, etc.
- Understanding signage and warning signals.

On-the-job training must be documented using the City's On-The-Job Training Record and retained on file by the worker's Divisional Manager.

Supervisor Health and Safety Training – 3 Year Expiry
Any Worker employed with the City who are "Supervisors" as determined by the OH&S *Act*, Section 2(k.1), and WorkplaceNL PRIME Path 2, must undergo WorkplaceNL's Supervisor Health and Safety Training or equivalent.

Harassment Prevention Plan – Annually
All Workers shall be trained in the prevention of workplace harassment, and the City's specific Harassment Prevention Plan. Refresher training shall occur annually as per Section 24.1 (3)(b) of the OH&S Regulations. For workers who have access to Reach360, refresher training will be conducted through a micro-learning course. Worker's that do not have access to Reach360 will be trained in the City's Harassment Prevention Plan by means of a Safety Meeting or On-The-Job Training Record.

WHMIS 2015 – No Expiry
All Workers who are required to handle or who are exposed to hazardous materials shall be provided with City specific WHMIS 2015 training available on Reach360 or in person.

Electrical Arc Flash – No Expiry
Workers working with, near, or around live electrical equipment must complete electrical arc flash training as per the CSA Standard.

First Aid – 3 Year Expiry
The OH&S First Aid Regulations, Section 4, requires the following for each jobsite:

- *Where an Employer requires a worker to work alone the employer shall if it is reasonable to do so or if required to do so by an officer ensure that the worker holds a valid emergency first aid certificate.*
- *Where more than one but less than fifteen workers are engaged on one shift an Employer shall ensure that one of the workers holds a valid emergency first aid certificate unless an officer directs that a higher certificate is necessary.*
- *Where fifteen or more but less than two hundred workers are engaged on one shift an Employer shall ensure that there is:*
    - *At least one worker who holds a valid standard first aid certificate unless an officer directs that a higher certificate is necessary; and*
    - *In addition, a worker holding a valid emergency first aid certificate for each group of twenty-five workers thereafter.*
- *An employer shall appoint a First Aid Attendant where two hundred or more workers are engaged on one shift and in addition shall ensure that there is a worker with a valid emergency first aid certificate for each group of twenty-five workers thereafter.*

Asbestos Awareness – No Expiry*
Workers who perform asbestos abatement or are exposed to asbestos must be qualified by successfully completing a course accepted by the Digital Government and ServiceNL's OH&S Division.

**No Expiry depending on the training provider.*

Explosive Actuated Tools – No Expiry
Operators of explosive actuated tools must have a valid operator's certificate for the tool used.

Hearing Conservation – Annually
Where it is determined hearing protection is required, Workers must complete in-house training pertaining to the City's Hearing Conservation Program. Additionally, Worker's shall receive annual hearing assessments.

Respiratory Protection – 2 Year Expiry*
Any Worker who is required to use a respirator will be trained on the use, care, and maintenance of the respirator. Additionally, Workers must be fit tested on the respirator and every two years thereafter.

*The two-year expiry only applies if a Worker does not have any changes in their facial structure due to dental surgery, excessive weight loss/gain, etc. In this situation, the Worker may require to be fit tested more frequently.

Musculoskeletal Injury Prevention – 3 Year Expiry
Managers and Supervisors, in consultation with Occupational Health & Safety, must provide Musculoskeletal Injury Prevention Training to Workers every three years. This training will be available on Reach360 and in person.

Forklift Safety – 3 Year Expiry
Worker required to operate a forklift will be certified prior to using the forklift. Unauthorized and untrained Workers are not permitted to operate forklifts.

Mobile Elevated Work Platform – 5 Year Expiry
Any Worker required to operate a mobile elevated work platform (e.g., boom lift, scissor lift, etc.) must be certified. In order to obtain certification in mobile elevated work platforms, Workers must first be certified in WorkplaceNL Fall Protection.

Lockout/Tagout – No Expiry*
Workers shall be trained on how to safely shut down, isolate, and control hazardous energy sources in machinery or equipment before maintenance or servicing in accordance with the OH&S Regulations, Sections 129-135.

**No expiry depending on the training provider.*

Trenching and Excavation - No Expiry*
Workers shall be trained on how to safely perform trenching and excavation procedures. Training will include legislative requirements, identifying soil types, and how to locate all utility lines and services before beginning an excavation.

**No expiry depending on the training provider.*

Transportation of Dangerous Goods (TDG) – 3 Year Expiry
Workers who handle, offer for transport, or transport dangerous goods must be adequately trained and hold a TDG certificate in accordance with TDG regulations. Every department/division that receives, ships, or transports dangerous goods (including hazardous waste) must identify Workers for handling these goods and ensure they are properly trained.

WorkplaceNL, Level 1 and Level 2 OH&S Committee/WH&S Representative – 3 Year Expiry
As required by the OH&S *Act* and Regulations, OH&S Committee members and WH&S Representatives shall be provided with the appropriate training as prescribed by WorkplaceNL. WH&S Representatives are only required to attend the Level 1 course whereas OH&S Committee members are required to attend the Level 1 course and Level 2 course.

WorkplaceNL, Fall Protection – 3 Year Expiry
Workers who utilize fall protection equipment and who are required to conduct work at heights of three meters or more are required to complete the WorkplaceNL Fall Protection course. Workers will be required to complete a one-day recertification course every three years (if their certification does not expire).

WorkplaceNL, Powerline Hazards – 3 Year Expiry
This course is required for any operator of mobile equipment. This course gives an increased awareness of the potential dangers associated with power lines. It examines the responsibilities of Management and Workers under the OH&S *Act* and Regulations as they apply to power lines and electrical systems. This course also explains the proper procedures for working near power lines, including emergency situations.

WorkplaceNL, Traffic Control Person Level 1 – 3 Year Expiry
Workers performing the duties of a traffic control person must complete the level 1 training course. The primary objective of Level 1 is to provide a traffic control person with the skills and competency to protect themselves, co-workers, and the general public while perform traffic control duties.

WorkplaceNL, Traffic Control Person level 2 (Traffic Control Planner) – 3 Year Expiry
Workers, primarily Managers/Supervisors, responsible to implement and monitor traffic control plans shall complete the Level 2 course. A valid Traffic Control Person Level 1 certificate is a prerequisite for the Traffic Control Person Level 2 certification.

WorkplaceNL, Confined Space Entry – 3 Year Expiry
Workers who are required to perform work in areas designated as a confined space must complete the regulated two-day Confined Space Entry course. As per the OH&S Regulations, Section 511, a "confined space" means an enclosed or partially enclosed space that:

- Is not designed or intended for human occupancy except for the purpose of performing work.
- Has restricted means of access and aggress.
- May become hazardous to a person entering it because of its design, construction, location/atmosphere, materials or substances in it, or any other condition relating to it.

ORIENTATION PROCEDURE

Managers/Supervisors, in consultation with Occupational Health & Safety are responsible for conducting worker orientations. Orientations must be documented and signed by the Worker and the Manager/Supervisor (or designate) conducting the orientation.

The City will provide a worker orientation to:

- New workers.
- Workers who return to work after extended absences of six (6) months or greater.
- Long-term Workers (longer than five years).
- If a Worker transfers to a different department.
- When there are changes in the workplace that present new potential hazards.
- When trends indicate the need for further training and education.

Managers/Supervisors and Occupational Health & Safety will make every effort possible to ensure that Workers and other persons performing work for the City receive an orientation before they begin work. Records of all orientations will be kept as part of each Worker's safety training record.

The City's worker orientation will familiarize Workers with the following two (2) components:

1. Review of Policies and Procedures

The following must be included in the first component of the orientation:

- The names and signatures of the person performing the orientation and the person being orientated.
- The date(s) that the orientation was started and completed.
- Roles and responsibilities of the Employer, Manager, Supervisor, and Worker regarding OH&S.
- OH&S and RTW policy statements.
- General safety rules for the worksite.
- Communication methods of OH&S information including the frequency of toolbox talks.
- Education and training.
- The OH&S Committee/WH&S Representative name(s) and their role in OH&S.
- Three (3) basic rights of Workers.
- Procedure for reporting incidents and carrying out investigations.
- Procedure for workplace inspections.
- Procedure for hazard recognition, evaluation, and control including the methods for reporting hazards.
- Specific job hazards and safety precautions.
- Safe work practices and procedures applicable to the Worker's role.
- PPE requirements – including instruction on the safe inspection, cleaning, care, storage, and use of PPE (including any limitations).
- Working alone procedure (if applicable).
- Alcohol and Drug Policy.
- Environmental procedures.
- WHMIS and chemical management requirements.
- Emergency response procedures.
- Harassment prevention plan and workplace violence procedures.
- Respectful Workplace Policy.
- RTW program.

2. Site Tour

The tour shall provide individuals with information specific to the workplace and will be conducted by the Manager, Supervisor, (or designate):

- Location of emergency equipment (e.g., emergency eyewash stations, fire extinguishers, first aid kit, etc.).
- PPE Requirements.
- Housekeeping procedures.

COMMUNICAITION STRATEGIES

The City recognizes that effective communication is essential to implementing, maintaining, and evaluating an OH&S Program. Safety related information must be made available to all Workers in a suitable and timely manner.

The City uses OH&S boards, intranet webpage, posters, emails, Reach360, QR codes and Safety Meetings to communicate OH&S information in the workplace.

OH&S Board Requirements
Every facility is required to have an OH&S board accessible to all Workers that include, at a minimum, the following information:

- OH&S Policy statement.
- RTW Policy.
- Injury reporting poster.
- Name(s) of OH&S Committee Members/WH&S Representative.
- Copy of the most recent OH&S Committee meeting minutes.
- Names of trained first aiders, their level of training, and expiry dates.
- Most recent workplace inspection.
- Harassment Prevention Plan.
- Respectful Workplace Policy.

OH&S Legislation Requirements
A copy of the Newfoundland and Labrador OH&S Act and Regulations must be available in every City facility and accessible to all Workers.

Emergency Evacuation Route Requirements
Evacuation routes must be posted and made visible to all Workers in every City facility.

GENERAL HEALTH AND SAFETY RULES

Generally, there are two types of incidents – those caused by unsafe conditions and those caused by unsafe acts. The following unsafe acts, if practiced in any area of the facility will result in disciplinary action upon discretion by the manager/supervisor:

- Engaging in horseplay, running, scuffling, or throwing things.
- Reporting to work unfit for duty due to substance use.
- Tampering with safety devices on equipment or any other apparatus, which has specially designed safety precautions.
- Using a cellphone while operating City vehicles and equipment.
- Defacing or removal of any WHMIS labels, safety data sheets, or hazard symbols.
- Refusal to wear PPE, where the wearing is required.
- Falsifying incident witness reports or knowingly reporting incident, which did not occur.
- Ignoring safe work practices and procedures when they are communicated to you.
- Failing to report damage to equipment and machinery to your Manager/Supervisor.

- Failing to report incidents that occur.
- Refusal to complete required safety forms.
- Refusal to wear seatbelts while operating company vehicles.
- Any other safety violation that the Worker knows or reasonably ought to know that would cause personal injury or property damage.

THREE RIGHTS OF WORKERS

1. The right to know about hazards to which they are exposed.
2. The right to participate and assist in identifying and resolving safety issues.
3. The right to refuse unsafe work.

Right to Refuse Unsafe Work Process
In accordance with Section 45(1) of the OH&S *Act,* a Worker may refuse to do work that they have reasonable grounds to believe is dangerous to their health or safety or the health and safety of any other person in the workplace.

Step 1 – Report immediately to their Manager/Supervisor, giving the precise conditions for the refusal to work. The Worker and their Manager/Supervisor will investigate the refusal and ensure the Right to Refuse Work Form is completed. If the Manager/Supervisor cannot resolve the refusal to the Workers satisfaction, the worker can proceed to Step 2.

The Manager/Supervisor must notify Occupational Health & Safety in the event of a work refusal.

Step 2 – The **Worker** reports the refusal to the OH&S Committee/WH&S Representative for further investigation. If the matter is not resolved by the OH&S Committee/WH&S Representative, the Worker can proceed to Step 3.

Step 3 – Where a Worker has made a report and the matter has not been remedied to the satisfaction of the Worker, the **Worker** shall report the refusal to a Digital Government and ServiceNL OH&S Officer. The OH&S Officer makes the final decision regarding the refusal.

Right to Refuse Unsafe Work Guidelines

- The Worker refusing work may be assigned to another task while the work refusal is being investigated. If the Worker is assigned another task, they shall be granted their normal compensation.
- Workers may not take advantage of their right to refuse unsafe work without reasonable grounds.
- The City/Union shall not take disciplinary action against Worker(s) for reasonably using their right to refuse work.
- A refused task by a Worker may be assigned to another Worker under the following conditions:
    1. The other Worker being assigned the work must be made aware that a work refusal has been initiated and the reason(s) for the work refusal.

2. The other Worker being assigned the task can then decide if they wish to perform the task. If the other worker accepts the task they must sign off on the Right to Refuse Work Form indicating that the refusal has been communicated to them.

RESOURCES

All resources can be found on the St. John's Intranet webpage.

Forms

- Worker Health & Safety Orientation Form
- Safety Meeting (Toolbox Talk) Form
- Right to Refuse Work Form
- On-The-Job Training Record

Templates

- Training Matrix Template

ST. JOHN'S

NEWFOUNDLAND AND LABRADOR, CANADA

ELEMENT 8 – EMERGENCY PREPAREDNESS AND RESPONSE

EMERGENCY PREPARDENESS AND RESPONSE

Emergency preparedness and response is the process of planning for, managing, and recovering from unexpected events such as natural disasters, medical emergencies, power outages, or public safety threats. Effective preparedness includes creating emergency plans, maintaining communication systems, training personnel, and stocking essential supplies to minimize risks and protect people and property.

For clarification, the following definitions apply:

"Emergency" means a situation or event where the City takes immediate action to protect Workers, and property that are at risk, where this action does not form part of their normal business activity.

"Emergency Response Plan" means the prescribed actions to be taken in the event of an emergency.

"Emergency Equipment" means equipment that is specifically designed and placed for the purpose of being used to control or contain an emergency.

RESPONSIBILITIES

Managers are responsible for:

- Ensuring an emergency response plan (ERP) is developed in consultation with Occupational Health & Safety.
- Ensuring responsibilities of workplace parties, including Wardens, are outlined in the ERP.
- Providing facilities, equipment and supplies to support the ERP. Ensure facilities, equipment and supplies are readily available, marked and visible.
- Ensuring emergency response equipment and supplies are inspected and maintained in accordance with legislation, standards and the manufacturer's instructions.

Supervisors are responsible for:

- Participating in the development of the ERP.
- Communicating the ERP to Workers, Contractors and Visitors (where applicable).
- Educate Workers, Contractors, and Visitors on evacuation routes, muster locations and the locations of emergency supplies and equipment, emergency contact information, and the names of first aiders.
- Provide access to first aid training and maintain the required number of trained first aiders on each shift.

Workers are responsible for:

- Participating in the development of the ERP, when asked.
- Participating in training, when required.
- Communicating health and safety concerns to Supervisors.
- Reporting incidents to Supervisors immediately.
- Participating in ERP drills.

Occupational Health & Safety are responsible for:

- Providing guidance to Managers and Supervisors in the development of ERPs.
- Periodically auditing ERPs to ensure they are effective.
- Arranging emergency drills for selected buildings.
- Auditing emergency drills.

OH&S Committees/WH&S Representatives are responsible for:

- Participating in the development of the ERP, when asked.
- Reviewing the ERP and offering recommendations as required.

Contractors are responsible for:

- Becoming familiar with and following the ERP, where required.
- Never tampering with emergency equipment or supplies.
- Cooperating fully with Managers/Supervisors in emergency situations.

Visitors are responsible for:

- Becoming familiar with the nearest emergency exit, muster location, and emergency response supplies (e.g., fire extinguishers, first aid kits, etc.).
- Never tampering with emergency equipment or supplies.
- Cooperating fully with Managers/Supervisors and/or the escort of the City in emergency situations.

Building Wardens are responsible for:

- Acting as the Chief of operations during an emergency.
- Liaising with emergency responders.
    - Receives instructions and information from the emergency responders and relays the information to the Assistant Building Warden.
- Acting in accordance with the nature of the emergency.
- Directing the movement of Workers from their muster stations to the staging area depending on the nature of the emergency or in the event of inclement weather.
- Ensuring team members are current and familiar with roles.

Assistant Building Wardens are responsible for:

- Filling in as Building Warden if the Building Warden is absent.
- Liaising between the Building Warden and the Floor Wardens during an emergency.
    - Receives information from Floor Wardens on the status of their floors.
- Performing other duties as required to assist the Building Warden during an emergency.

Floor Wardens are responsible for:

- Liaising between the Assistant Building Warden and the Deputy Floor Warden.
- Confirming everyone is out of the building.
    - Conducting a thorough check of the area, including the washrooms, meeting rooms, etc.

  - Ensuring that everything is put away, turned off and that anything suspicious or any other concerns are noted.
  - Being mindful and accommodating of person(s) with disabilities.
- Reporting area status to the Assistant Building warden after being briefed by the Deputy Floor Warden.

Deputy Floor Wardens are responsible for:

- Assuming the role of Floor Warden in their absence.
- Getting everyone's attention at the sound of an alarm (e.g., "may I have your attention", "please follow me", etc.).
- Assembling all Workers at the designated exit before vacating the building.
- Escorting Workers to their designated muster station.
- Confirming everyone is accounted for and reporting to the Floor Warden.
- Remaining with Workers and ensuring order is maintained.
- Gathering names of Visitors, if they wish to leave the group.
- Sending for medical assistance if Workers are injured.
- Noting any issues or problems relating to the evacuation and raising concerns during debriefing session.
- Updating Floor Warden on the status of the group.

EMERGENCY RESPONSE PLAN

Every worksite (location) shall implement an ERP. The template for the ERP is available on the City's Intranet webpage.

Building Designated Managers are responsible for ensuring the ERP is developed in consultation with Occupational Health & Safety. The ERP, at a minimum, shall include the following:

- Responsibilities of all workplace parties involved in the ERP.
- Building evacuation procedures and routes, including identification of muster station(s).
- Identification and description of potential hazards.
- Emergency contact phone numbers (including Manager's/Supervisor's contact information).
- Description and inspection requirements of any tools, equipment, PPE or other devices required to protect Workers.
- First aid requirements, including the number of first aiders needed and their level of training.
- First aid kit requirements.
- Fire evacuation procedure.
- Fire extinguisher requirements, the type(s) of fire extinguishers used, and requirements for annual inspections.
- Requirements for fire evacuation drills and when they are required to be performed.
- Description on how to use a fire extinguisher.
- Lockout/lockdown procedure.
- Active criminal threat procedure.

- Procedure on what to do if a Worker encounters a violent person(s).
- Severe inclement weather procedure.
- Bomb threat procedure.
- Terrorist threat procedure.
- Procedure on what to do if an injured person needs to be transported to a medical facility.

Debriefing Sessions:
When the emergency situation is under control and workers are allowed back in the building, the Emergency Response Team shall hold a debriefing session within 24 hours in consultation with representatives from the SJRFD.

Communication
The ERP must be communicated to all Workers. Communication shall be documented and provided to Occupational Health & Safety upon request.

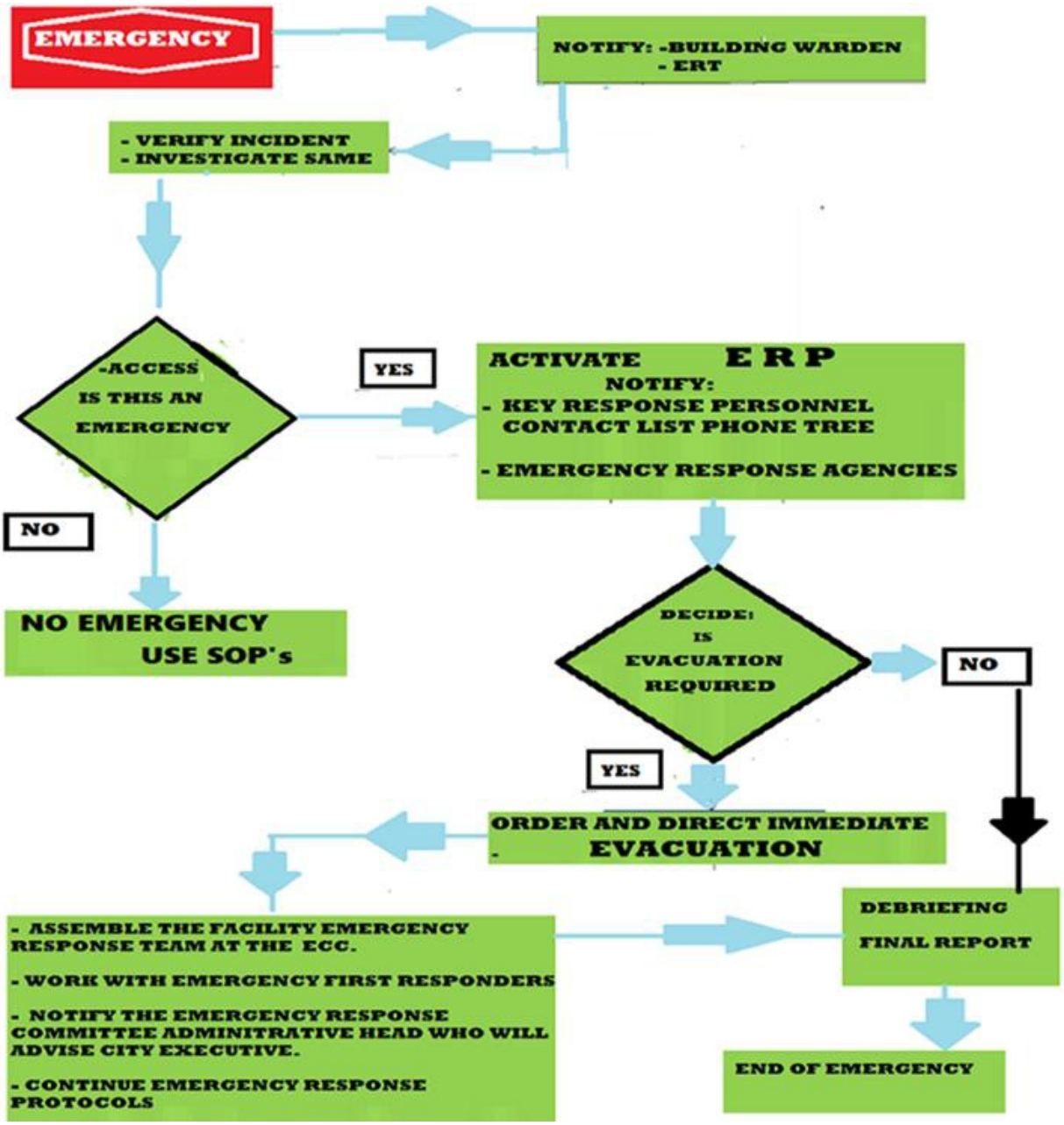
Police and Fire Department Authority
In the event of an emergency, the designated person as outlined in the ERP (Building Warden) will inform the responding officer in charge of the situation. The responding officer shall be in charge of the situation. Personnel shall not re-enter the worksite until authorization is obtained from the responding officer in charge and the Building Warden.

Continuous Improvement
The ERP shall include the date the plan was last reviewed. The ERP must be reviewed, at a minimum, every three years or when there is a change that could affect the health and safety of Workers.

Emergency Contacts
All emergency contacts shall be outlined in the ERP and posted on OH&S boards.

Emergency Contact	Phone #
AMBULANCE, POLICE, FIRE	**911**
Security	(709) 576-4357 or 576-HELP
Fire	(709) 722-1234
Police	(709) 729-8000
Poison Centre – Atlantic Canada	1-844-764-7669
Mental Health Crisis Line	811
Environmental Emergencies	(709) 772-2083
OH&S Division – Accident Reporting Line	(709) 729-4444

Emergency Response Flowchart



EMERGENCY RESPONSE EQUIPMENT REQUIREMENTS

First Aid Kits

Department Managers are responsible to ensure all first aid kits are up to date, stocked, accessible and visible in the workplace with signage present. Contents of the first aid kits shall be inspected during the workplace inspection. All first aid kits shall meet the requirements set out in CSA Standard Z1220 and can be purchased from the stock room.

Fire Suppression Systems

In locations equipped with automatic fire suppression systems, and sprinklers shall be maintained by a competent person. Workers shall not place any object in a position that would obstruct operation of the sprinkler heads or their ability to detect fire (e.g., 18" clearance.).

Automated External Defibrillator (AED)

Sudden cardiac arrest can happen to anyone, even those with no prior symptoms. An AED is a portable electronic device that diagnoses potentially life-threatening heart rhythms and can treat them by sending an electric shock to the heart.

- AEDs are placed in designated City facilities with locations posted on OH&S boards.
- AEDs must be maintained in working order.
- Naloxone nasal spray kits are placed in with AEDs.

Emergency Eyewash and Shower Units

Used for the rinsing and/or decontamination of the eyes and surrounding facial area and body in the event of a chemical exposure or particulate in the eye. The type of unit(s) needed depends on the chemicals Workers are exposed to. Review of the SDSs and completion of a hazard assessment will determine the appropriate unit(s) for the worksite. ANSI Standard Z358.1-2014 is the standard for emergency eyewash and shower facilities in Canada. In the event emergency eyewash and/or shower units are required, they must be within 50 feet of the hazard.

Chemical Spill Kits

A chemical spill kit is a ready-to-use collection of tools and absorbent materials designed to quickly contain, clean, and safely dispose of hazardous spills. They're essential in workplaces where oils, chemicals, and fuels are handled, helping to prevent environmental damage and spread of harmful substances. The appropriate spill kit will be determined by what chemicals are present, how hazardous they are, volume, and spill response procedures outlined on the SDSs.

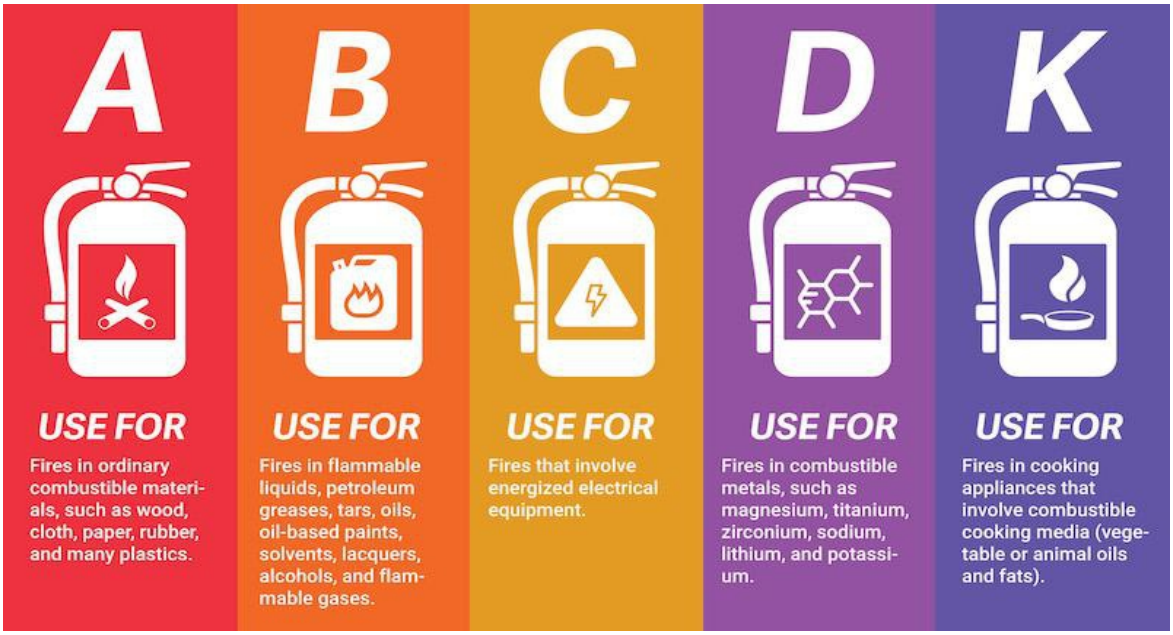
Fire Alarms

Fire alarms are essential safety systems designed to detect signs of fire and alert building occupants to evacuate quickly and safely. In the workplace, fire alarms play a critical role in protecting Workers, Visitors, property, and business operations. Early detection and warning can help prevent injuries, save lives, and reduce damage by allowing emergency services to respond faster. Fire alarms shall be maintained by City Buildings and third-party inspectors as required. In the event the fire alarm is out due to maintenance, fire watch will be initiated by security.

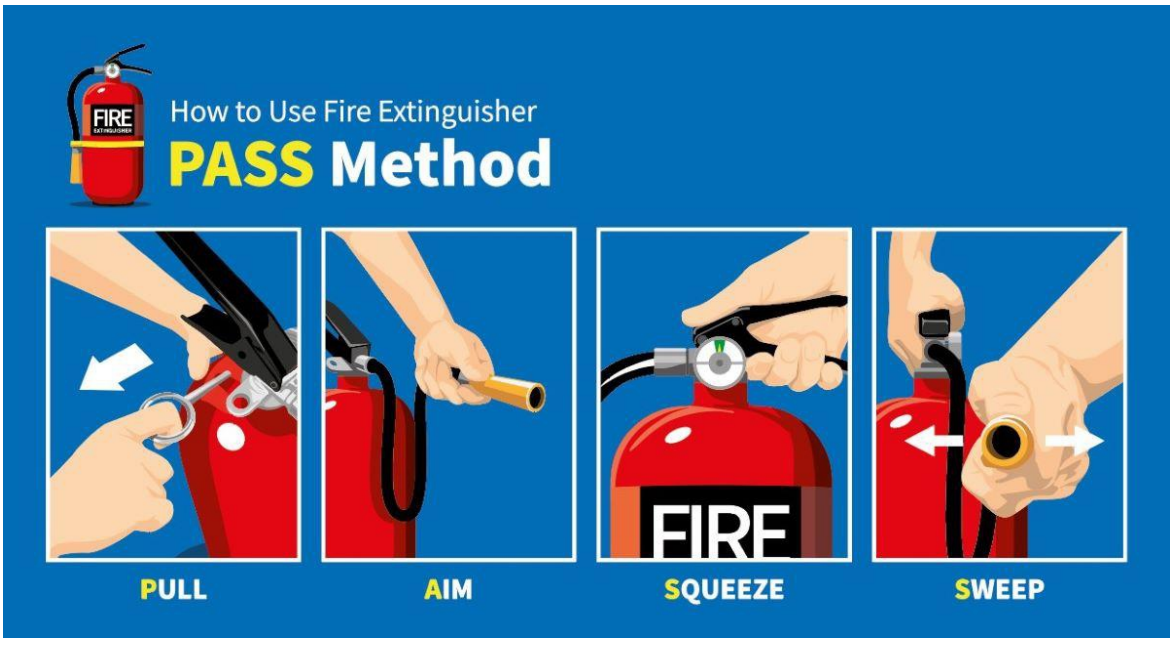
Fire Extinguishers

All portable fire extinguishers shall be installed on brackets or mounted in wall cabinets. A qualified third-party inspector will inspect all extinguishers at least annually. Inspection of fire extinguishers will also take place monthly by the designated Floor Warden(s) for each worksite. The tag located on fire extinguishers will be initialed once it's inspected.

Class of fire extinguishers:



How to use a fire extinguisher:



Carbon Monoxide Alarms

Carbon monoxide alarms are safety devices designed to detect the presence of carbon monoxide (CO), a colorless, odorless, and highly toxic gas. These alarms provide an early warning when CO levels become dangerous, allowing occupants to evacuate and address the source of the problem quickly. CO alarms shall be maintained by City Buildings.

FIRST AID REQUIREMENTS

Workplace first aiders play a vital role in creating a safe, prepared, and supportive work environment. In the event of an injury, medical emergency, or sudden illness, trained first aiders can provide immediate care that may prevent a situation from becoming more serious while emergency services are on the way.

The OH&S First Aid Regulations, Section 4, requires the following for each jobsite:

- *Where an Employer requires a worker to work alone the employer shall if it is reasonable to do so or if required to do so by an officer ensure that the worker holds a valid emergency first aid certificate.*
- *Where more than one but less than fifteen workers are engaged on one shift an Employer shall ensure that one of the workers holds a valid emergency first aid certificate unless an officer directs that a higher certificate is necessary.*
- *Where fifteen or more but less than two hundred workers are engaged on one shift an Employer shall ensure that there is:*
    - *At least one worker who holds a valid standard first aid certificate unless an officer directs that a higher certificate is necessary; and*
    - *In addition, a worker holding a valid emergency first aid certificate for each group of twenty-five workers thereafter.*
- *An employer shall appoint a First Aid Attendant where two hundred or more workers are engaged on one shift and in addition shall ensure that there is a worker with a valid emergency first aid certificate for each group of twenty-five workers thereafter.*

EVACUATION DRILLS

In accordance with 507.00 PRIME Path 2 Employers Section 8.4 Managers and/or Supervisors shall "train all parties in their role in the emergency rescue or response plan, if applicable. Supplement training with emergency evacuation drills for each occupied worksite at least **once a year**, at a minimum."

RESOURCES

All resources can be found on the City's Intranet webpage.

Forms

- Floor Warden Checklist

Templates

- Emergency Response Plan Template

ST. JOHN'S

NEWFOUNDLAND AND LABRADOR, CANADA

ELEMENT 9 – OH&S COMMITTEES AND WH&S REPRESENTATIVES

OH&S COMMITTEES AND WH&S REPRESENTATIVES

The OH&S Committee/WH&S Representative monitors the health, safety and welfare of Workers employed at the workplace. The OH&S Committees/WH&S Representatives' primary role is to improve the health and safety in the workplace by recognizing hazards, making recommendations for corrective action, responding to Worker concerns, and monitoring the OH&S Program.

GUIDELINES

OH&S Committee:
Where twenty (20) or more workers are employed at a workplace, Management will establish an OH&S Committee. Each OH&S Committee will consist of no less than two (2) members and will not exceed twelve (12) members. Every member on the OH&S Committee will receive WorkplaceNL Level 1 and Level 2 OH&S Committee/WH&S Representative/Designate certification. The certification expires every three (3) years.

At least half of the OH&S Committee must consist of worker representatives. There shall never be more Management representatives on the OH&S Committee than Worker representatives as per legislative requirements.

OH&S Committee Quorum:
A quorum is the minimum number of members needed to hold a meeting or make decisions during a meeting. It is the OH&S Committee's responsibility to make sure half of the membership is present for the meeting and there is equal representation from both Workers and Management, or there are more Worker members present than Management members present.

OH&S Committee Meetings:
Meetings must be held, at a minimum, **once every 90 days**. Failure to meet every 90 days will result in an unsuccessful WorkplaceNL PRIME evaluation. Meetings must take place during normal working hours and members are not to suffer loss of pay for attending the meetings as per legislative requirements. Special meetings may be convened at the request of the Co-Chairs. Special meetings must be documented the same a normal OH&S Committee meetings.

Meeting dates for the year will be determined by the Co-Chairs in December and posted so committee members can schedule the quarterly meetings in their calendars.

OH&S Committee Terms of Reference:
Each OH&S Committee must develop a Terms of Reference. The Terms of Reference shall be reviewed with all members, at a minimum, every three (3) years and signed by the Co-Chairs. The Terms of Reference must include the following:

- Name of the OH&S Committee.
- Composition of the OH&S Committee.
- Purpose of the OH&S Committee.
- Terms of service.
- Functions of the OH&S Committee.

- Record keeping.
- Agenda, minutes, and frequency of meetings.
- Amendments.

OH&S Committee Guests:
Guests can attend OH&S Committee meetings to help monitor the effectiveness of the OH&S Committee, provide expert advice on issues present, and help inform members of new OH&S legislation or industry standards. It's important to note that guests are not members of the OH&S Committee and they do not have authority to vote.

OH&S Committee Secretary:
An OH&S Committee may have a designated secretary to help with the administrative processes. If a secretary is used, it must be clearly stated in the Terms of Reference. The secretary is responsible for recording all minutes and OH&S activates carried out during meetings. The OH&S Committee Co-Chairs and secretary work together to ensure the OH&S Committee functions properly, all members participate, and the administrative processes are followed.

OH&S Committee Meeting Minutes:
The meeting minutes must be submitted into WorkplaceNL's connect system and posted on the OH&S board as soon as possible after the Co-Chairs have had an opportunity to review and sign. The City's OH&S Advisors are responsible for monitoring the submitted minutes on WorkplaceNL Connect. Additionally, the meeting minutes will be made available on the City's Intranet webpage.

OH&S Committee Agenda:
The agenda is essential to the success of OH&S Committee meetings and shall be distributed to members, at a minimum, one (1) week prior to the meeting. The agenda ensures meetings proceed in an orderly fashion and are not side tracked with non-health and safety related issues and members are aware of the topics and have time to research before the meeting.

WH&S Representative:
Where there are less than twenty (20) Workers employed at a workplace, Management must ensure that a Worker is designated as the WH&S Representative to monitor the health, safety and welfare of Workers employed at the workplace. The WH&S Representative **cannot** be connected with the Management of the workplace (e.g., cannot be a Manager, Supervisor, Foreperson, Lead-Hand, etc.). Every WH&S Representative will receive WorkplaceNL Level 1 OH&S Committee/WH&S Representative/Designate certification. The certification expires every three (3) years.

WH&S Representative Terms of Reference:
Management in consultation with the WH&S Representative will establish a Terms of Reference. The Terms of Reference will include, at a minimum, the name of the WH&S Representative, purpose of the WH&S Representative, terms of service, and record keeping requirements. The Terms of Reference will be reviewed, at a minimum, every three (3) years and signed by the WH&S Representative.

OH&S Committee/WH&S Representative Recommendations to Management:
The OH&S Committee/WH&S Representative shall forward any recommendations to Management. In accordance with the OH&S *Act,* Management will provide a written response to the recommendations of the OH&S Committee/WH&S Representative **within thirty (30) days** after receipt of the written recommendations. This response shall include a timeframe for implementing the recommendations agreed with, and/or the reasons for disagreement with any recommendations not accepted.

ROLES AND RESPONSIBILITES

The roles and responsibilities of the OH&S Committee/WH&S Representative include:

- Making recommendations for the establishment of health and safety practices and procedures.
- Reviewing elements of the OH&S Program and making recommendations (if necessary).
- Identifying aspects of the workplace that are unhealthy and unsafe and recommend corrective action(s).
- Helping to identify and resolve health and safety concerns of Workers.
- Maintaining accurate records including, but not limited to; Worker complaints, work refusals, hazard reports, and inspections.

Right to Refuse Work
Where a Manager/Supervisor cannot resolve an issue involving the right to refuse work, the issue shall be brought forward to the OH&S Committee/WH&S Representative for investigation.

Incident Investigations
The OH&S Committee/WH&S Representative will review incident investigation reports and make recommendations when necessary. The OH&S Committee/WH&S Representative may be asked to assist in the incident investigation process.

Workplace Inspections
It is a requirement that OH&S Committee members/WH&S Representatives participate in workplace inspections. One (1) OH&S Committee member, at minimum, must participate in workplace inspections. A minimum of two (2) workplace inspections must be completed annually as per the City's requirements. When completed, the results of the workplace inspection checklist will be reviewed with all OH&S Committee members/WH&S Representatives.

RESOURCES

All resources can be found on the St. John's Intranet webpage.

Forms

- OH&S Committee Agenda

Templates

- OH&S Committee Terms of Reference Template
- WH&S Representative Terms of Reference Template

ST. JOHN'S

NEWFOUNDLAND AND LABRADOR, CANADA

ELEMENT 10 – RETURN TO WORK PROGRAM

RETURN TO WORK PROGRAM

The goal of the Return-to-Work Program is to provide safe and suitable work in accordance with the injured Worker's functional abilities as outlined by the injured Worker's health care provider. The effectiveness of the workplace parties return to work activities will be measured by the success in which an injured Worker returns to pre-injury employment, pre-injury with modifications or alternate suitable work. The primary objective, where possible, is to maintain an injured Worker's connection with their pre-injury job in accordance with WorkplaceNL's hierarchy of Return to Work and Accommodation, Policy RE-18. Depending on the injured Worker's physical limitations, the suitable work will incorporate the Worker's regular duties. If this is not a safe or suitable option, the Return-to-Work Program will incorporate other duties that are in accordance with the injured Worker's work capabilities.

RESPONSIBILITIES

Injured Worker:

- Seek appropriate first aid or medical aid immediately, if needed.
- Report injury/incident to your Manager before leaving the workplace, if possible.
- Complete a Worker's Report of Injury (Form 6) and submit it to WorkplaceNL as soon as possible by faxing toll free to 1-800-276-5257 or 709-778-1302. The Form 6 can also be submitted electronically through MyWorkplaceNL.
- Assist the Incident Investigation Team with the Incident Investigation Report, when asked.
- If unable to return to work the day after the injury occurred, seek immediate medical attention and advise the health care provider you were injured at work. Obtain copies of all necessary workplace injury forms. There is to be no delay in seeking medical attention for workplace injuries. If Worker is unable to see their own provider, the Worker must visit urgent care.
- Submit the Doctor's Report of Injury Form (Form MD), Chiropractor's Report (8/10c), or Physio Report (PR) to the Disability Case Manager as soon as possible after completion.
- Obligated under WHSC Act S.100 and Policy RE-02 to work with the Disability Case Manager and Management to identify suitable employment that is available and consistent with the functional abilities provided by the health care providers.
- Duty to participate when modified work is offered.
- Report any issues that arise during the Return-to-Work Program immediately to the Disability Case Manager, to ensure all concerns are promptly addressed.
- Ensure regular communication is maintained with the Disability Case Manager to provide status updates and discuss further return to work planning.
- Where a return to work is not appropriate, maintain regular communication with the Disability Case Manager as often as deemed necessary and provide a copy of the Form MD and other medical treatment provider forms as soon as possible following their appointment.
- In accordance with WHSC Act, an injured Worker is required to take all reasonable steps to reduce or eliminate loss of earnings resulting from an injury. An injured Worker is required to seek out and co-operate in any medical aid or treatment that, in the opinion of WorkplaceNL or the attending health care provider promotes an injured Worker's recovery and return to work. This includes keeping all scheduled appointments as deemed necessary to assist with recovery and return to work.

- Required to provide WorkplaceNL and the Disability Case Manager with full and accurate information on matters relevant to a return to work and claims for compensation.
- The injured Worker is required to notify WorkplaceNL and the Disability Case Manager of any change in circumstances that affect return to work planning and entitlement to compensation, including but not limited to vacation/travel plans, medical conditions not related to the claim impacting recovery, and subsequent accidents and injuries that are sustained during recovery period.
- The injured Worker shall attend occupational fitness for work appointments when deemed necessary by Occupational Health & Safety with the City's third-party medical provider.
- At such time that the injured Worker receives clearance for any return to work, including return to their pre-injury position, the injured Worker must report this update to the Disability Case Manager immediately following their medical appointment but no later than the next working day.
- In accordance with the WHSC Act S. 100, where the Worker is determined to have permanent functional limitations that prevent them from returning to their pre-injury position, the Disability Case Manager and Human Resources will meet with the injured Worker to discuss suitable permanent employment options. Suitable employment options may include: 1) pre-injury employment with permanent restrictions, 2) alternate employment with permanent restrictions.
- In the event of a recurrence of symptoms related to a previous injury, injured workers must report the recurrence immediately to Management and the Disability Case Manager. The reporting process and the return to work obligation are the same as if the injured worker sustained a new injury.

Management:

- Direct your injured worker to appropriate medical care. Arrange transportation or call 911 in emergency situations.
- Complete an Employer's Report of Injury (Form 7) and submit it to the Disability Case Manager as soon as possible.
- Complete an Incident Notification Form.
- Take action and prevent further injuries by completing a root cause analysis.
- Collaborate with the Disability Case Manager and the injured worker on a suitable Early and Safe Return to Work Plan.
- In accordance with WorkplaceNL's Policy RE-02 (The Goal of Early and Safe and the Roles of the Parties), maintain effective communication with the injured worker during their return-to-work program. All meetings, conversations with injured workers regarding medical appointments, treatment plans, and rehabilitation must be documented appropriately.
- Communicates an injured worker's restrictions and/or accommodations to their co-workers.
- Monitors recovery process and attendance of the injured worker to ensure compliance with return-to-work plan and to prevent further injury.
- Discuss concerns with the return-to-work plan or the safety of the injured worker with Disability Case Manager.
- In accordance with WHSC Act, S. 100 and S. 101, and Policy RE-05 (Re-employment Obligation), where the injured worker is considered unable to return to the pre-injury position due to

functional limitations, Management will be asked to consider other suitable permanent employment options, to the extent that it does not cause undue hardship. The primary objective of returning the injured worker to suitable alternate work is to, where possible, maintain the worker's connection to the pre-injury job. If this is not possible, consideration will be given to modifying the position to accommodate the restrictions.

- If modifications to the pre-injury position are not appropriate, Management will discuss suitable alternate work options. As per S. 100 of the Act, Management and the Disability Case Manager will meet with the injured worker to discuss and identify suitable work options in accordance with the functional information available.
- In the event of recurrence symptoms related to a previous injury, management or assigned designate must complete and submit the WorkplaceNL Form 7 to the Disability Case Manager. Management will address reports of recurrences in the same manner as reports of new work injuries.

Disability Case Manager:

- Upon notification by Management, contacts the injured worker to ensure early intervention and provide support.
- In accordance with S. 100 of the WHSC Act, will review the completed Form MD with the injured worker to discuss functional abilities and implement return to work planning where possible.
- If there is insufficient information on the Form MD, the Disability Case Manager will refer the injured worker back to their health care provider or to the City's third-party occupational health medical provider.
- In consultation with Management, will collaborate with the injured worker to develop a return-to-work plan, when medically supported. This plan must be completed, agreed to, and signed by all parties and forwarded to WorkplaceNL within five working days of receiving the injured worker's functional abilities.
- In accordance with WorkplaceNL's Policy RE-02 (The Goal of Early and Safe and the Roles of the Parties), will maintain effective communication with the injured worker as often as deemed necessary. All meetings, conversations with injured workers regarding medical appointments, treatment plans, and rehabilitation must be documented appropriately.
- Will monitor all aspects of return-to-work planning. There must be effective communication with the injured worker regarding medical and functional progress and complete adjustments to the return-to-work plan accordingly (e.g., hours of work, tasks assigned, providing assistive devices, etc.).
- In accordance with Policy RE-18, the goal of Early and Safe Return to Work Planning will be the pre-injury position. Upon receipt of functional abilities information, the Disability Case Manager will review the limitations to determine what, if any, essential duties of the pre-injury position the injured worker can perform and, in consultation with Management, communicate an offer of work to the injured worker within their limitations as soon as possible.
- Once back to work, the Disability Case Manager will maintain regular communication with the injured worker to ensure timely updates regarding functional information are received, with the goal of progression of duties toward pre-injury job duties.

- If a problem arises due to a change in the injured worker's limitations, the Disability Case Manager, in consultation with Management, will address and offer additional suitable employment that is compatible with the injured worker's functional abilities, where possible.
- Notifies WorkplaceNL of any non-compliance with the return-to-work process.
- Once an injured worker advises they are fit for the pre-injury duties, and confirms this with supporting medical documentation, the Disability Case Manager will work with Management to make arrangements to return the injured worker to pre-injury occupation as soon as possible or identify alternate work comparable to pre-injury occupation in accordance with WorkplaceNL Policy RE-06, alternate meaningful work.
- Maintain an up-to-date register of all workers that have active WorkplaceNL claims. In accordance with Policy RE-03, Functional Abilities Information, all relevant information must be kept confidential.

Disability Management Committee:

- Comprised of the Disability Case Manager, Occupational Health Nurse, Human Resource Representatives, Union Representatives, Occupational Health & Safety Representatives, and Management.
- The Disability Management Committee is essential to ensure effectiveness of the Return to Work Program.
- Act as a joint mechanism for consultation. The committee members must bring forward any concerns communicated to them by workers regarding the Return to Work processes and procedures.
- Review the Return to Work Program annually and offer recommendations (if any) to Occupational Health & Safety.
- Monitor complex Return to Work issues and discuss innovative and practical solutions.
- Meet, at a minimum, twice per year.
- Maintain confidentiality, ensuring Worker's names are not discussed.
- Keep a record of meeting minutes. The meeting minutes shall be provided to Workers upon request.

Occupational Health & Safety:

- Review the Return to Work Program annually, and update it as required to reflect new legislative standards.
- Track and trend loss time claims in consultation with the Disability Case Manager.
- The OH&S Manager will annually consult with the Senior Leadership Team regarding costs associated with lost time claims and determine if there are opportunities for continuous improvement or if there are any corrective actions that are needed.
- Provide assistance to the Disability Case Manager, when asked.
- Monitor the Return to Work Policy and inspect City buildings to ensure the policy is posted on the OH&S board.

Union/Union Representative:

- Assist their members to seek help when injured, ill or disabled.

- Assist the Disability Case Manager and Management to monitor the recovery progress of the injured worker.
- Participate in identifying early and safe return to work opportunities such as modified duties.
- Support and educate their members who are participating in return-to-work opportunities.
- Provide feedback on the Disability Management and Return to Work Programs.
- Support injury prevention initiatives by promoting safe work practices and reinforce the efforts of the Occupational Health and Safety Committees.
- Understand and support the goals, objectives, and benefits of the Disability Management and Return to Work Programs and communicate it to their members.
- Strive to protect and provide for the Disability Management and Return to Work Program's development and maintenance within their Collective Agreement.
- Maintain confidentiality and ensure documents are kept secure.

OH&S Committees/WH&S Representatives:

- Review the Return to Work Program and Return to Work Policy and offer any recommendations.

Health Care Practitioner:

- Is the attending Physician, Nurse Practitioner, Chiropractor, Physiotherapist, Occupational Therapist, Psychologist, Psychiatrist, or other member of the rehabilitation team.
- Must provide the injured worker with the Doctor's Report of Injury Form (Form MD), a Chiropractor's Report (8/10c), or a Physio Report (PR) that identifies the necessary information about the injured worker's expected return to work date and the functional abilities which will assist the employer in returning an employee safely back to work.
- It is essential that ongoing communication occur between the Health Care Provider, injured worker, Disability Case Manager and WorkplaceNL representative to prevent any misunderstandings and unnecessary prolonged absences.

WorkplaceNL:

- Confirm Return to Work plans are achieving the hierarchy of priorities as outlined in Policy RE-18 Hierarchy of Return to Work Priorities and Accommodation.
- Ensure Return to Work plans are consistent with the Worker's functional abilities as outlined in Policy RE-03 Functional Abilities Information for Return to Work.
- Facilitating the shared responsibilities of workplace parties.
- Provide advice and direction as required.
- Communicate regularly and effectively with the workplace parties and health care providers.
- Offer dispute resolution if required.

Confidentiality Statement

Documentation will be kept confidential in accordance with the Personal Health Information Act.

DISPUTE RESOLUTION

The City recognizes that from time to time situations may arise where there is a disagreement with items throughout the Return to Work Process.

Whenever there is a dispute, the following steps are recommended:

1. Review the Return to Work Policy and Return to Work Program documents. If an error was made, the injured worker, Disability Case Manager and Management will work collaboratively to correct the error.
2. In the case of a dispute over the actual disability (medical dispute):
    a. Review the functional abilities information provided by the injured worker's health care provider.
    b. Consult WorkplaceNL to clarify functional information and work collaboratively with the injured worker to resolve any remaining issues or concerns.
    c. If further dispute exists, the injured worker will be referred back to their health care provider or to the City's third party occupational health medical provider.
3. Seniority/collective agreement disputes will be referred to in the injured workers Union Local (if applicable) and Management for review.

RESOURCES

WorkplaceNL prescribed claim forms, including From 6 and Form 7 are available at each worksite and on the City's Intranet webpage.

ST. JOHN'S

NEWFOUNDLAND AND LABRADOR, CANADA

ELEMENT 11 – FALL PROTECTION AND PREVENTION PROGRAM

FALL PROTECTION AND PREVENTION PROGRAM

Management is committed to protecting its workers from falls. Falls can occur while working at heights, and/or by slips, trips, and falls.

The purpose of this Fall Protection and Prevention Program is to establish precautions, training, responsibilities, requirements, and methods, which are to be used by all Workers while working at heights, as stated in the minimum requirements set forth in this Fall Protection and Prevention Program. Any reference made to the "OH&S Regulations" hereon in, will refer to the Newfoundland and Labrador OH&s Regulations. Additionally, this Fall Protection and Prevention Program will provide preventative measures to enable recognition and elimination from slip, trip, and fall hazards from the same level.

Section 141 of the OH&S Regulations requires a Worker to use fall protection id a worker may work in conditions specifically outlined:

"where a worker is exposed to the hazard of falling from a work area that is

a. *3 meters or more above the nearest safe surface or water;*
b. *Above a surface or thing that could cause injury if the worker were to fall on it (impalement); or*
c. *Above an open tank, pit or vat containing hazardous material."*

The WorkplaceNL PRIME Path 2 Employers Element 11 – Fall Prevention States:

"falls are a common cause of injury in the workplace. Fall Prevention includes protecting workers from falls whether they are caused by slips and trips or falls from height."

Slips: Slips occur when there is a loss of footing due to incomplete contact between foot and ground, or loss of traction between foot and walking surface. Slips can be caused by various factors, including but not limited to:

- Slippery surfaces (wet surfaces such as mud/frost/snow/rainy weather, spills, waxed floor, etc.).
- Poor lighting in the workplace.
- Unanchored mats.
- Improper footwear being worn.
- Personal factors of Workers (e.g., wrong type of footwear, improper foot placement, etc.).
- Environmental factors.

Trips: Trips can occur when walking is interrupted by an obstruction or accidental error in stride. Trips can be caused by the following but are not limited to:

- Poor lighting.
- Obstructions blocking the line of vision.
- Environmental factors.
- Improper footwear.
- Poor housekeeping.
- Uneven surfaces, such as wrinkled rugs and/or carpets, uneven ground slopes or surfaces, stairs and steps, etc.

Falls: Falls can happen when there is a loss of balance, usually from a slip or trip, resulting in the body impacting the ground or the floor. There are two (2) major types of fall accidents – falls to the same level (e.g., a Worker falling to the same level they were standing on) and falls from height (e.g., a Worker falls from an elevation to the level below). There are several ways that Workers can fall in the workplace and injure themselves, such as:

- Falling off the side or the edge of a building.
- Using ladders and scaffolds the wrong way (e.g., unstable ground, overreaching, improper set-up, etc.).
- Falling through a floor opening.
- Falling off an object (chair, stool, ladder, etc.)
- Jumping from one level to another.
- Climbing on material or an object that is not intended to be climbed on.
- Wearing improper footwear.
- As a result of a slip and/or trip.

RESPONSIBILITIES

Managers are responsible for:

- Ensuring hazard assessments are completed to identify hazards that can lead to slips, trips, and falls.
- Participating in the development of safe work practices and procedures in fall prevention and protection.
- Educating Supervisors and Workers on safe work practices and procedures in fall prevention and protection.
- Monitoring required documentation to ensure it is being completed (e.g., fall protection plans).
- Ensuring legislative training (e.g., WorkplaceNL Fall Protection course) is being completed by required Workers.
- Leading by example, following all safe work practices and procedures and the guidelines outlined in this Fall Protection and Prevention Program.

Supervisors are responsible for:

- Performing hazard assessments to identify hazards that can lead to slips, trips, and falls and put appropriate controls in place.
- Investigating all incidents with assistance from the Incident Investigation team.
- Participating in the development of safe work practices and procedures in fall prevention and protection.
- Providing training to Workers in precautions to take to prevent slips, trips, and falls.
- Ensuring fall protection training is provided to Workers who work at heights. This training must be provided by a WorkplaceNL approved training provider. Rescue training must also be provided to any Worker who is part of a rescue team or will be expected to perform rescue at height.
- Ensuring required documentation is completed when Workers are performing work at heights (e.g., fall protection equipment pre-use inspection, fall protection plan, mobile elevated work platform pre-use inspection, etc.).

- Adding slip, trip, and fall risk factors into company specific workplace inspection checklists.
- Ensuring controls are put into place as soon as possible. If controls cannot immediately be put into place, temporary measures shall be implemented.
- Leading by example, by following all safe work practices, procedures, and the guidelines outlined in this Fall Protection and Prevention Program.

Workers are responsible for:

- Adhering to the Fall Protection and Prevention Program and follow the instructions of their Supervisor.
- Notifying their Supervisor of any unsafe or hazardous act or condition that may cause injury to themselves, co-workers, contractors, visitors, or the public.
- Adhering to recommended housekeeping practices.
- Wearing the appropriate safety footwear for the task.
- Participating in education and training sessions to prevent slips, trips, and falls.

Occupational Health & Safety are responsible for:

- Tracking and trending incidents to identify areas of concern with regards to slips, trips and falls.
- Advising Managers and Supervisors on OH&S legislation and fall protection requirements.
- Auditing training records to ensure appropriate training is in place for working at heights.
- Developing safety initiatives to help prevent slips, trips and falls from occurring.
- Leading by example, following all safe work practices, procedures, and the guidelines outlined in this Fall Protection and Prevention Program.

OH&S Committees/WH&S Representatives are responsible for:

- Promoting education and awareness of fall prevention procedures.
- Consulting with Managers, Supervisors, Workers, and Occupational Health & Safety regarding any fall prevention concerns.
- Leading by example, following all safe work practices, procedures, and the guidelines outlined in this Fall Protection and Prevention Program.
- Making recommendations and follow up to ensure corrective action are effective.

Visitors are responsible for:

- Adhering to recommended housekeeping practices.
- Immediately reporting slip, trip, and/or fall hazards when they are identified.
- Wearing appropriate PPE when required.

Contractors are responsible for:

All outside Contractors (and their Subcontractors) working for, or on behalf of the City will be required to follow the guidelines specifically set forth in the Fall Protection and Prevention Program unless the Contractor's program is equivalent. In addition, Contractors must follow the guidelines set out in the OH&S Regulations, Part X Fall Protection, WorkplaceNL's PRIME Element 11 – Fall Prevention, and any other pertinent legislation or standard.

GUIDELINES

Any task that requires a Worker to be on a walking/working surface that is set out in Section 141 (a), (b) or (c) stated above is to be protected from a fall to the lower level using:

- Guardrails/fixed barriers
- Personal safety net
- Fall arrest systems
- Temporary floor coverings
- Temporary and permanent handrails

And for greater clarity:

- Any task that brings a Worker close to a hole or opening in a walking or working surface that may allow a fall to a lower level will utilize a protection system such as a cover, guardrail, or travel restrict/restraint.
- If a fall hazard cannot be eliminated, then Managers/Supervisors will require Workers to use a fall arrest system. The fall arrest system, including its components to be used depends upon site conditions and work to be completed.
- A personal fall arrest system as outlined in the OH&S Regulations, Section 29 – Roof Work, must be used when no physical protection such as guardrails or full-decked scaffold or handrails are in place:
    - If a Worker is within 2 meters of the edge of a flat roof (less than 3/12 pitch) or open floor.
    - Working on a slope of an elevated platform (e.g., roof) that has a pitch 3:12 or greater.
    - If the pitch is greater than 6/12 then roof brackets must be used in addition to a fall arrest system.

Managers/Supervisors will conduct hazard assessments to identify where Workers are at risk of slips, trips, or falls, and put appropriate controls in place. When looking for slips, trips, and fall hazards, ensure to look at the interaction of people, equipment, materials, MSI risks, physiological health risks, and environmental factors. Performing ongoing hazard assessments, conducting workplace inspections and completing Incident Investigation Reports are all methods used to identify these hazards.

Some examples include, but are not limited to:

- Slippery surfaces (waxed floor, wet or oily surfaces, etc.)
- Environmental factors (frost, snow, ice, etc.)
- Unanchored mats.
- Uneven walking surfaces.
- Footwear with lack of tread.
- Improperly getting in and out of equipment.
- Housekeeping.
- Fear of heights (acrophobia).
- Obstructed view.

Once the hazards are identified, and the risk to Workers is evaluated, solutions or controls are put into place. The hierarchy of controls is used to identify the best solution to control the risk of a hazard once it's been identified.

The first attempt is to remove or eliminate the hazard, and when this is not reasonably practicable, incorporate other controls to reduce the risk to workers. When identifying a way to control slip, trip, and fall hazards, consider the following hierarchy of controls.

1. Elimination (including substitution or engineering) controls.
2. Administrative controls.
3. PPE controls.

Elimination: Physically remove the hazard. Examples include, but are not limited to:

- Removing ice or snow.
- Removing/fixing uneven surfaces.

Substitution: Replace the hazard. For example:

- Replacing slippery flooring with a slip-resistance surface.

Engineering: The installation or modification of equipment that physically controls the hazard. Workers are isolated or separated from the hazard. Examples include, but are not limited to:

- Ensuring stairs and railings meet the requirements of applicable building codes and OH&S Regulations.
- Applying floor treatment to increase slip resistance.
- Installing proper ventilation techniques to prevent a buildup of steam, condensation, and grease on the floors.

Administrative: Change the way Workers do their work. Examples include, but are not limited to:

- Displaying paint, warning strips, and signs to alert personnel about changed or uneven surfaces.
- Planning pedestrian routes to avoid wet and slippery areas.
- Developing safe work practices and procedures.
- Developing a preventative maintenance program to ensure equipment and machinery are working properly.
- Education and training.

Communication is also an important way of preventing slip, trip, and fall hazards. Whether it is the City's communication regarding strategies for prevention, the lessons learned from slip, trip and fall Incident Investigation Reports, hazard reports received, or the outcomes of workplace inspections.

Whatever the chosen method of communication is, it should always provide an opportunity for discussion, questions, and feedback. Safety meetings, guest speakers, emails, and posters are some of the practical ways the City communicates health and safety information.

Equipment Selection:
Prior to selecting fall protection systems and components/equipment, Managers/Supervisors shall conduct a hazard assessment of workplace conditions. The hazard assessment shall include, minimum clearance (including free fall and total fall distance), identify the presence of hazards including but not limited to, hot objects, sparks, flames, and heat producing operations, chemicals, electrical hazards, sharp and abrasive edges, unguarded openings, sand blasting, and atmospheric factors. These conditions can jeopardize the integrity and/or reliability of harnesses, lanyards, and lifelines

EDUCATION AND TRAINING

Managers/Supervisors are responsible for providing education and training to Workers on the contents of this Fall Protection and Prevention Program as it applies to their scope of work. Not all City Workers are required to work at heights, however, all Workers are exposed to slip, trip, and fall hazards.

Orientation:
Workers will receive training in slip, trip, and fall awareness during initial orientation and re-orientations.

Safe Work Practices and Procedures:
Managers/Supervisors in consultation with Occupational Health & Safety will educate and train Workers in safe work practices and procedures pertaining to fall protection and prevention.

WorkplaceNL, Fall Protection Certification – 3 Year Expiry:
As per the OH&S Regulations Section 139, a Worker shall not use fall protection equipment unless the worker has completed a training program on fall protection prescribed by WorkplaceNL.

Fall Rescue Training:
Managers/Supervisors will ensure education and training is provided for any Worker who is part of a rescue team or will be expected to perform rescue at height. At a minimum, the training will include:

- Review of this Fall Protection and Prevention Program.
- WorkplaceNL, Fall Protection Certification.
- Instruction on the job-specific Fall Protection Plan which will include the rescue teams plan.
- Training in the manufacture's manual on the rescue equipment being used. This includes, but is not limited to, how to properly inspect, anchor, assemble and use the rescue equipment.

Managers/Supervisors may, at their discretion, engage external experts to ensure the proper application of specialized rescue training.

Care, Storage, and Maintenance of Equipment:

- Proper maintenance of fall protection equipment is essential to preventing incidents.
- Managers/Supervisors must educate workers on how to follow the manufacturer's recommendations for inspections.
- Fall protection equipment subjected to drop loading from actual use shall be taken out of service and destroyed.

- Fall protection equipment shall be kept in a clean condition and stored in a clean, dry area at normal temperature and not exposed to environmental factors such as health, light, excessive oil or other degrading elements.
- Hang equipment in a dry location in a manner that retains its shape. For example, when hanging a harness up, use the d-ring to put the harness on the hook.
- Never use equipment for any other purpose other than personal fall protection.
- Once exposed to a fall, remove equipment from service immediately.

Additional training

Additional training may include, but is not limited to:

- Mobile elevated work platform (MEWP) certification.
- Confined Space Entry.
- Powerline Hazards.
- Use of scaffolds.
- Safe ladder use.

FALL PROTECTION PLAN

Where a Worker is exposed to the hazard of falling from a work area that is three (3) meters or more above the nearest safe surface or water; above a surface or thing that could cause injury to the Worker if the Worker were to fall on the surface or thing; or above an open tank, pit or vat containing hazardous material;

The Manager/Supervisor must ensure:

- Worker is provided with a fall arrest system, guardrail, personal safety net, or temporary flooring that complies with the OH&S Regulations.
- Workers are certified in a WorkplaceNL approved Fall Protection course.
- A job-specific **Fall Protection Plan is developed.**

Occupational Health & Safety have developed a Fall Protection Plan template that is available on the City's intranet webpage. The Fall Protection Plan template can also be provided by contacting your OH&S Advisor, or by emailing safety@stjohns.ca.

The Fall Protection Plan must include:

- A description of the work and the work location.
- The location and description of present or potential fall hazards.
- Roles and responsibilities of workplace parties involved in the Fall Protection Plan.
- Control measures to protect workers from working near fall hazards such as guardrails, barriers and signage.
- Method to determine appropriate anchorage points, if applicable. Anchor points must have a minimum strength of 5000lbs (2272kg).
- Method for a qualified person to calculate free fall distance and the minimum clearance required, if applicable. The free fall distance is the distance before the fall arrest system engages, and the

minimum clearance is the minimum distance required to safely stop a fall without hitting the ground or obstacles.

- Procedure for storing or otherwise securing equipment, tools and materials at height to protect workers below.
- Procedures to inspect, maintain, assemble, dissemble, use and store fall arrest systems or personal safety nets in accordance with the manufacture's manual and applicable legislation.
- Procedures to inspect, maintain, use and store ladders, scaffolding, stages or work platforms (if applicable) in accordance with the manufacture's manual and applicable legislation.
- Rescue procedure.
- The dates the plan was developed, reviewed or updated.
- The dates the plan was communicated to applicable workers and a list of their names.

The Fall Protection Plan is a critical component when planning work at heights and must be completed to ensure due diligence. Any questions regarding the development of a Fall Protection Plan can be directed to your OH&S Advisor.

EQUIPMENT INSPECTIONS

Pre-Use Inspections:
Must be completed by the end-user in conjunction with the City's Fall Protection Equipment Pre-Use Inspection. All equipment components must have must have legible labels, model/serial numbers, and CSA Standards. Fall Protection Equipment Pre-Use Inspections will be kept on file by Managers.

The end user shall inspect the equipment (pre-use) in accordance with the manufacture's manual and check for the following:

- Webbing fabrics for cuts, tears, mildew, enlarged eyeholes, or other signs of wear that might affect strength.
- Stitching from breaks, ragged strands, loose or rotted threads, and for other signs of weakening.
- Metal hardware for breaks, cracks, fractures, loose anchorage, or other signs of wear or deterioration which might affect the strength of the equipment or the action of the fastening devices.
- Lifelines and lanyards for frayed or broken strands, cuts, and abrasions. Inner fibers should be examined for breaks, discoloration, and deterioration.
- Particular attention should be given to any junction points of components for any abnormal wear and tear.

Any fall arrest system that has been altered should be place out of service and an incident investigation must be conducted.

Annual Inspections:
A competent, certified inspector must complete an annual inspection of all fall arrest equipment. The inspection reports shall be maintained by the Manager and made available to Occupational Health & Safety upon request. Certain equipment (e.g., retractable lifelines) may need to receive a special annual inspection by a manufacture approved inspector – these requirements can be found in the equipment

manufacture's manual. When equipment reveals defects in, damage to, or inadequate maintenance of equipment, the equipment shall be permanently removed from service and destroyed.

RESCUE PROCEDURES

Rescue procedures are critical because they ensure a prompt and organized response when a Worker is suspended after a fall, reducing the risk of serious injury or death. Without a proper rescue plan, suspended Workers can quickly suffer from conditions like suspension trauma, which can become life-threatening within minutes. Having well-trained personnel and a clear Fall Protection Plan in place improves response time, enhances workplace safety, and helps Managers/Supervisors comply with safety regulations.

Self-Rescue:
If the Worker working at heights is provided with the proper fitting equipment and educated on the Fall Protection Plan, it is likely the fallen Worker will be able to perform self-rescue which will include:

1. The Worker will try to remain calm and self-assess their body to determine if there are any injurers.
2. If the Worker is not badly injured they will climb back up to the level from which they fell.
3. The Worker will return to the floor/ground and notify their Supervisor of the fall. If medical attention is needed the Worker will contact 911.
4. The Worker will remove their fall arrest equipment and deliver it to Occupational Health & Safety so it can be taken out of service.

Mobile Elevated Work Platform Rescue:
In the event a mobile elevated work platform (MEWP) is available, the following rescue method can be used:

1. The authorized rescuers as determined in the Fall Protection Plan will evaluate the situation and ensure it is safe to rescue the Worker using a MEWP.
2. One Worker shall take on the responsibility to notify the Supervisor and contact 911 if the fallen worker is unconscious or suffered injuries.
3. The authorized rescuers will inspect and don their fall protection equipment and get inside the MEWP, ensuring they have a spare lanyard with them.
4. The authorized rescuers will tie off to the MEWP on the approved anchorage point.
5. The authorized rescuers will raise the lift to the level the Worker has fallen and attach the spare lanyard to the d-ring of the fallen worker and tie them off to the approved anchorage point on the MEWP.
6. The authorized rescuers will then detach the Worker from their lanyard once they are securely fastened to the MEWP.
7. The authorized rescuers will lower the MEWP and bring the fallen Worker to ground level.
8. If the fallen Worker is conscious, they will remove their fall arrest equipment when on ground level and deliver it to Occupational Health & Safety .

If the fallen Worker is working in a separate MEWP, the MEWP can be lowered using the ground controls if it is safe to do so.

Ladder Rescue:
It is strongly recommended that a ladder is available in the immediate area where working at heights is being conducted. The ladder must be in good condition and CSA approved. To rescue a fallen Worker using a ladder the following method can be used:

1. The authorized rescuers we retrieve the ladder, as per the Fall Protection Plan, and bring it to where the Worker has fallen.
2. If the fallen worker is conscious, and if it is deemed safe to do so, the fallen Worker will use the ladder to climb down themselves, while another Worker is at the bottom stabilizing the ladder (holding onto it).
3. If the fallen Worker is unconscious or suffered injuries, one Worker will stay at the bottom to contact 911 and stabilize the ladder. Another authorized rescuer will then climb the ladder, if it is deemed safe to do so, and assist the fallen Worker. If the fallen Worker cannot climb down the ladder with the help of the authorized rescuer, everyone must wait for emergency services to arrive.

Emergency Service Rescue:
If it is determined that self-rescue, use of a MEWP, or ladder rescue is not a possible method for rescue emergency services must be contacted. If a Worker has fallen, another Worker will be responsible for contacting emergency services (911). The Worker must stay with the fallen worker until emergency services arrive and the fallen worker has been recused. The Supervisor must be notified as soon as possible.

Third Party Rescue:
Under special circumstances during the job planning process it may be deemed necessary that a third party is brought to the jobsite to monitor Worker(s) where there is a hazard of falling. The third-party rescuers are trained experts and have the required equipment to rescue Workers. If third party rescue is to be used, it must be clearly identified during the job planning process and explained in the Fall Protection Plan.

RESOURCES

All forms can be found on the St. John's Intranet webpage.

Forms

- Fall Protection Equipment Pre-Use Inspection
- Fall Protection Plan
- MEWP Pre-Use Inspection

ST. JOHN'S

NEWFOUNDLAND AND LABRADOR, CANADA

ELEMENT 12 – OCCUPATIONAL HEALTH PLAN

OCCUPATIONAL HEALTH PLAN

Occupational health conditions are caused by exposure to hazardous substances or environments in the workplace as part of work activities. Preventing these conditions requires the elimination or reduction of hazardous exposures, and the control of risks. It is important that Managers, Supervisors and Workers take an active role in preventing exposures that are known to cause occupational health conditions.

RESPONSIBILITIES

Managers are responsible for:

- Actively participating in the identification of occupational health hazards.
- Ensuring certified, competent person(s) are used during health surveillance diagnostics (e.g., noise surveys, air quality assessment, lead assessments, etc.).
- Participating in hazard assessments to determine occupational health hazards and implement controls to reduce the risk to Workers.
- Ensuring hazard assessments are developed.
- Ensuring safe work practices and procedures are developed.
- Maintaining compliance with legislation regarding health assessments and exposure limits.

Supervisors are responsible for:

- Actively participating in the identification of occupational health hazards.
- Ensuring certified, competent person(s) are used during health surveillance diagnostics (e.g., noise surveys, air quality assessment, lead assessments, etc.).
- Participating in hazard assessments to determine occupational health hazards and implement controls to reduce the risk to Workers.
- Training Workers on occupational health hazards and controls required for their protection.
- Participating in the development of safe work practices and procedures to ensure exposure to a health hazard is kept as low as reasonably practical and does not exceed the occupational exposure limit, where applicable.
- Participating in the development of safe work practices and procedures to use and maintain engineering controls that are required for a Worker's protection from an occupational health hazards.
- Maintaining compliance with legislation regarding health assessments and exposure limits.

OH&S Committees/WH&S Representatives are responsible for:

- Actively participating in the identification of occupational health hazards.
- Reviewing hazard assessments and offer recommendations.
- Assisting in the communication of health hazards and corrective actions to workers.

Workers are responsible for:

- Participating in training, as required.
- Participating in hazard assessments, when asked.
- Reporting health hazards to their Supervisor immediately.

- Following safe work practices and procedures.
- Wearing appropriate PPE, as required.

Occupational Health & Safety are responsible for:

- Actively participating in the identification of occupational health hazards.
- Monitoring the City's Occupational Health Plan to ensure its effectiveness.
- Advising Managers, Supervisors, and workers on legislative requirements regarding health assessments and exposure limits.
- Participating in the development of hazard assessments and safe work practices and procedures.
- Assisting in the communication of health hazards and corrective actions to workers.

The Occupational Health Nurse is responsible for:

- Booking screening appointment.
- Managing health records.
- Identifying occupational health trends (e.g., hearing loss, bloodwork abnormalities, loss time claims due to respiratory illnesses, etc.).
- Case managing occupational illness claims (e.g., presumptive cancer, psychological, etc.).
- Arranging routine health assessments with third party provider.
- Identifying positions that require prophylactic vaccinations and scheduling vaccine appointments based on the Canadian Immunization Guidelines.

Contractors are responsible for:

- Actively participating in the identification of occupational health hazards.
- Reporting health hazards to a City representative.
- Wearing appropriate PPE, as required.

Visitors are responsible for:

- Reporting health hazards to a City representative.
- Wearing appropriate PPE, as required.

OCCUPATIONAL HEALTH HAZARDS

The following occupational health hazards have been identified within the City. The following list is not exhaustive, and not all identified health hazards apply to every department:

- Noise exposure.
- Respiratory illnesses/diseases.
- Allergens.
- Influenza.
- Lead exposure.
- Hepatitis.
- Mold.
- Musculoskeletal injuries/disorders.

Noise Exposure
When there is a noise hazard identified the City will ensure a noise assessment is completed to meet legislative and CSA Standards. The findings from the noise assessment will determine the appropriate recommendations and hearing protection required. Where hearing protection is required, Workers shall abide by the City's Hearing Conservation Program.

Respiratory Illnesses/Diseases
Airborne particles, chemical fumes, gases, asbestos, viruses, etc., can all lead to respiratory illnesses and diseases. When there is a risk of respiratory illness or disease, the City will ensure health surveillance diagnostics (e.g., air quality sampling) is completed to meet legislative and CSA standards. Where respiratory protection is required to be worn, Workers shall abide by the City's Respiratory Protection Program.

Allergens
Allergens are substances (usually proteins) that can trigger an abnormal immune response in some people. When someone with an allergy is exposed to an allergen, their immune system overreacts, causing symptoms that can range from mind to severe and cause anaphylaxis. Common allergens that can be found in the workplace include food (e.g., peanuts), pollen, dust, mold, insect stings, and contact allergens from chemicals.

Influenza
Influenza is a health hazard that exists in every workplace with symptoms ranging from mild to severe. The City has developed flu prevention practices to help prevent Workers from getting sick. All Workers are encouraged to wash hands regularly, practice social distancing when they are feeling unwell, and seek medical attention if they are experiencing severe flu symptoms. Additionally, influenza vaccines are offered every Fall.

Lead Exposure
Worksites involving construction, welding, renovation of older buildings, etc., can generate lead dust or fumes if lead is present. Lead is a dangerous health hazard because it is damaging to critical body systems, often before symptoms are obvious. Where there is a risk of lead exposure for 30 days or greater in a calendar year, the City will ensure a Lead Exposure Plan is in place.

Hepatitis
Hepatitis is a medical term for inflammation of the liver. It is caused by infections, toxins, and oftentimes contaminated water or food. Where there is a risk of hepatitis (e.g., wastewater treatment facilities), Workers shall abide by the City's Infectious Disease Plan. Hepatitis vaccines are provided to all Workers who are at risk of contact with bodily fluids.

Mold
Exposure to mold can trigger a range of symptoms, particularly in people with sensitivities. Mold releases spores into the air which can reduce overall air quality, cause respiratory issues and allergic reactions, and circulate through HVAC systems spreading contamination beyond the original source. Additionally, some molds produce mycotoxins which may cause headaches, fatigue or irritation. When mold is identified, a

hazard assessment shall be conducted to determine if air sampling is required. If air sampling is required and the exposure limit exceeds the ACGIH threshold, the mold will be remediated as per applicable legislation.

Musculoskeletal Injuries/Disorders
An injury or disorder of the muscles, tendons, ligaments, joints, nerves, blood vessels or related soft tissue, including a sprain, strain or inflammation that may be caused or aggravated by work. Where a musculoskeletal injury/disorder hazard exists, the City will ensure ergonomically appropriate tools, equipment, and workstations are made available to Workers. All Workers shall abide by the City's Musculoskeletal Injury Prevention Program.

OCCUPATIONAL HEALTH HAZARD ASSESSMENTS

When occupational health hazards have been identified or there is potential for occupational health hazards in the workplace, it is the responsibility of Management to ensure the hazards are documented and appropriate controls are in place.

Occupational health hazard assessments (e.g., noise surveys, air quality assessments, lead assessments, etc.) will be performed by a certified, competent person in consultation with a Manager/Supervisor and Occupational Health & Safety. The cost of the assessments will be charged to the department or division responsible for the worksite. The person(s) conducting the health hazard assessments must be knowledgeable in legislative requirements and CSA Standards.

The occupational health hazard assessment(s) shall include:

- Date(s) of the health hazard assessment.
- Details of the health hazard(s) being assessed.
- Details of the work area and Workers being assessed, if applicable.
- How the hazard was assessed, including how measurements were collected and analyzed (e.g., sampling methodology, laboratory methodology, etc.), if applicable.
- Occupational exposure limit for the hazard(s) being assessed, if applicable.
- Results of the assessment (e.g., whether the measured exposure(s) during the assessment exceeded the occupational exposure limit).
- Corrective actions to be taken where the results of the assessment indicate that Workers are at risk of overexposure including the person(s) responsible for the action, the timeline for completion, date of completion, and date to follow up for effectiveness.
- Plan to communicate the results of the assessment to applicable Workers.
- The signature and date of the person(s) who performed the assessment.

HEALTH SURVEILLANCE METHODS

The City recognizes the importance of health surveillance and is committed to implementing health surveillance methods in accordance with legislation and best industry practices. Personal health information from health surveillance methods will be kept confidential in accordance with the Personal Health Information Act.

Pre-Employment Medical Examinations
Pre-employment medical examinations or Health Declaration Forms are required for all new workers within the City. The purpose of the pre-employment medical examinations is to determine if workers are fit for work. The examinations are conducted at third-party medical clinic. The results of the examinations are kept confidential and only provided to the City's Occupational Health Nurse for review.

Firefighter Medical Examinations
Every two years, firefighters hired by the City are required to undergo medical examinations as per NFPA standards to ensure they are healthy enough to work safely and effectively during their career. These medical exams include psychological health evaluation, cancer screening, and cardiac screening. The results of the examinations are kept confidential and only provided to the City's Occupational Health Nurse for review.

Annual Audiometric Testing
Workers who are required to wear hearing protection will receive annual audiometric testing as per the City's Hearing Conservation Program. The results of the audiometric tests will be monitored by Occupational Health & Safety.

Vaccinations
Workers who are exposed to the risk of hepatitis, rabies, tetanus, and/or tuberculosis are recommended to receive the appropriate vaccines for their scope of work. The vaccine appointments will be made by the Occupational Health Nurse.

Respiratory Protection
If respirators are required to be worn by a Worker, they will receive a fit test to ensure it is safe for them to wear a respirator and to ensure the correct fit. Workers are required to be fit tested every two years after their initial fit test **unless** the Worker has substantial changes to their weight or undergone oral/facial reconstructive surgery/procedure.

Public Health Notifications
In the event the Government of Newfoundland and Labrador announces a public health outbreak, epidemic, or pandemic, the City will abide by Government recommendations and develop appropriate safe work practices and procedures.

CONTINUOUS IMPROVEMENT

This Occupational Health Plan serves as the requirements and guidelines for recognizing and controlling occupational health hazards in the workplace. Occupational Health & Safety, in consultation with Managers and Supervisors will monitor the Occupational Health Plan and the following programs/plans to maintain compliance with legislation and CSA Standards:

- Hearing Conservation Program
- Respiratory Protection Program
- Infectious Disease Plan
- WHMIS Safety Program

ST. JOHN'S

NEWFOUNDLAND AND LABRADOR, CANADA

ELEMENT 13 – MUSCULOSKELETAL INJURY PREVENTION PROGRAM

MUSCULOSKLELETAL INJURY PREVENTION PROGRAM

The purpose of a Musculoskeletal Injury (MSI) Prevention Program is to establish a system for the identification, evaluation, and control of MSI hazards in the workplace. The goal of the program is to maximize Worker health, safety, efficiency and productivity by matching the requirements of the job with the abilities of the Worker (e.g., ergonomics). The City is committed to reducing the direct and indirect costs associated with an MSI incident in the workplace.

The MSI Program assigns specific roles and responsibilities to Managers, Supervisors, Workers and the OH&S Committee/WH&S Representative with regards to prevention of MSI related injuries. The city is committed to educating Workers on the early detection and prevention of MSI related hazards to prevent work related injuries from occurring.

DEFINITIONS

MSI – An injury or disorder of the muscles, tendons, ligaments, joints, nerves, blood vessels or related soft tissue, including a sprain, strain or inflammation that may be caused or aggravated by work. The term MSI is used in Newfoundland and Labrador. Other terms with similar meanings include:

- Soft-tissue injury
- Musculoskeletal disorder
- Repetitive strain injury
- Repetitive motion injury
- Occupational overuse syndrome
- Cumulative trauma disorder

Ergonomics – Matching the job and processes to the Worker. Ergonomics and human factors are often used interchangeable in the workplace. Both describe the interaction between the Worker and the job demands.

Body mechanics – The way in which your muscles and joints interact to help you move in your daily activities.

Contact stress – Occurs when a body part presses against a hard surface damaging the nerves, tendons, blood vessels, and other tissues due to pressure and decreased blood flow.

Forceful exertions – The effort that a muscle or group of muscles uses to complete a job.

Repetitive motions – Refer to using the same muscles repeatedly and usually occur when the same task is performed over and over, or when different tasks are performed using the same muscles.

Sustained posture – Holding the body, or a part of the body, in one position for an extended period.

Awkward posture – Posture that requires a body part to move away from its neutral position.

Manual handling – includes any way in which workers physically move or handle an object (e.g., lifting, lowering, pushing, pulling, carrying, and holding).

Neutral posture – Joints are in their natural rested position and stress on the musculoskeletal system is reduced.

Overexertion – Putting more force on the body tissues than they can handle.

The City will operate in compliance with the Newfoundland and Labrador OH&S Regulations, Sections 50-56 regarding musculoskeletal injury prevention and control:

- Section 50, Musculoskeletal Injury Prevention (MSI)
- Section 51, MSI Risk Control
- Section 52, MSI Education and Training
- Section 53, MSI Evaluation
- Section 54, MSI Consultation
- Section 55, Seating or Standing Work
- Section 56, Lifting and Handling

RESPONSIBILITIES

The City is committed to ensuring a written MSI Prevention Program is implemented and maintained. The City will ensure ergonomically appropriate tools, equipment, and workstations are made available to Workers.

Managers are responsible for:

- Participating in the identification, assessment, and control of MSI hazards.
- Ensuring existing and potential MSI risk factors are communicated to workers before work or tasks begin.
- Providing Supervisors and Workers with the resources for appropriate training in MSI prevention.
- Encouraging early reporting of MSI signs and symptoms.

Supervisors are responsible for:

- Participating in the identification, assessment, and control of MSI hazards.
- Communicating existing and potential MSI risk factors to workers before work or tasks begin.
- Providing workers with the resources for appropriate training and coaching in MSI prevention.
- Monitoring safe work practices and procedures for MSI risks and ensure they are followed.
- Encouraging early reporting of MSI signs and symptoms.
- Promptly responding to reported MSI signs, symptoms and concerns.
- Participating in investigations of reported MSI signs, symptoms and hazard concerns.

Workers are responsible for:

- Following ergonomic safe work practices and procedures and reporting any signs, symptoms, or concerns related to MSI's.

- Participating in MSI training.
- Using ergonomic tools, equipment, and workstations.
- Cooperating with investigations and hazard assessments related to MSI prevention.
- Taking part in early reporting of MSI signs, symptoms and hazard concerns to support early intervention.
- Workers are encouraged to provide feedback to their Supervisor and OH&S Advisor regarding the effectiveness of the City's MSI Prevention Program.

OH&S Committees/WH&S Representatives are responsible for:

- Participating in the identification, assessment, and control of MSI hazards
- Reviewing MSI related reports (e.g., IIR's, ergonomic assessments, etc.) and recommending corrective actions.
- Consulting with Managers, Supervisors, Workers and OH&S Advisors on MSI issues.
- Discussing MSI prevention and ergonomics during OH&S Committee meetings.

Occupational Health & Safety are responsible for:

- Aiding in the development of MSI prevention training and ensuring it is rolled out across all departments.
- Communicating existing and potential MSI risk factors.
- Reviewing MSI related reports (e.g., IIR's, ergonomic assessments, etc.) and recommending corrective actions.
- Training Managers and Supervisors in the City's MSI Prevention Program.
- Liaising with Managers and Supervisors in the development of MSI hazard assessments.
- Track leading and lagging indicators pertaining to MSIs.

Contractors and Visitors are responsible for:

- Adhering to the City's MSI prevention procedures while on-site.
- Reporting all incidents, including MSI incidents, to a City management representative.

SIGNS AND SYMPTOMS

An MSI can occur suddenly or develop gradually over time. For example, a muscle or tendon strain can occur suddenly from overexerting the back or shoulder to lift a heavy box, whereas carpal tunnel syndrome develops gradually from performing routine repetitive motions of the hand and wrist without sufficient rest over a prolonged period of time.

With some MSI's, signs and symptoms develop gradually, and they may seem insignificant at first but should never be ignored. By identifying the warning signs, action can be taken before injury occurs.

Examples of MSI warning signs and symptoms include:

- Aches and pain
- Tenderness
- Heaviness

- Stiffness or loss of joint movement
- Tightness
- Numbness
- Tingling
- Swelling
- Weakness or tired feeling in affected area

REPORTING AND INVESTIGATION PROCEDURE

All Workers, Contractors, and Visitors are expected to report the early signs or symptoms of an MSI or concerns about potential MSI hazards as soon as they arise.

The following is the City's procedure for reporting and investigating MSI's:

1) As soon as a worker notices discomfort, pain, or any symptom that may indicate the onset of an MSI, the worker must notify their manager/supervisor.
2) The manager/supervisor will initiate an incident notification **within 24 hours**. An incident notification can be emailed to safety@stjohns.ca or completed by contacting your assigned OH&S Advisor for assistance.
3) Once the incident notification is submitted, an Incident Investigation Report will be completed **within 72 hours** by the Incident Investigation Team.
4) The Incident Investigation Team will conduct interviews (as needed), perform task/workstation assessments, and review past reports or trends.
5) The Incident Investigation Report will identify corrective actions with clear timelines and responsibilities.
6) The OH&S Committee/WH&S Representative will review the Incident Investigation Report and offer additional recommendations if needed.
7) The Supervisor is responsible for informing the affected Worker(s) of the findings and planned corrective actions. This communication must be documented.
8) The Supervisor with support from the OH&S Committee/WH&S Representative will follow up on the corrective actions to verify resolution and effectiveness.

IDENITFYING MSI RISK FACOTRS

MSI risk factors exist in every workplace. According to WorkplaceNL, MSIs are the most common lost time injury in Newfoundland and Labrador workplaces every year.

There are four primary MSI risk factors that have to do with how work is performed and there are four secondary MSI risk factors that have to do with the environment of the worker.

The following four primary risk factors for MSIs are the most common risk factors that cause MSIs in the workplace:

1) **Awkward postures** - A position that requires a body part to move away from its neutral or natural position. Examples include, reaching overhead, twisting the back, turning or bending the neck, kneeling, squatting and stooping.

2) **Sustained postures** - Holding the body, or a part of the body, in one position for an extended period. Even keeping a neutral posture for an extended period can have negative effects (e.g., neutral sitting or standing). Sustained muscle activity commonly occurs in the neck and shoulder region (e.g., computer work, overhead work).

3) **Forceful exertions** - The effort that a muscle or group of muscles must exert to complete a job or task. A job may involve high amounts of force (a single action of lifting a heavy load) or a continuous build-up of force on the body over time (frequently lifting lighter loads). The more muscular effort required to perform a task, the more stress is placed on body tissues such as muscles, ligaments, joints and spinal discs, increasing the risk of an MSI.

4) **Repetitive motions** - Using the same muscles repeatedly. It occurs when the same task is performed over and over, or when different tasks are performed using the same muscles. Without sufficient time for muscles to rest, fatigue develops, causing injury. Examples include working at the same station for long periods, loading or unloading pallets, stamping dozens of papers, and prolonged use of a computer mouse or keyboard.

The following four secondary risk factors for MSIs have to do with the environment of the Worker and are less common causes of MSIs:

1) **Local contact stress** - The physical contact between body tissues and hard objects or surfaces in the work environment such as tools, machinery, and work surfaces. Examples include resting forearms on a desk edge, holding a tool that has ridges or hard edges on its handle which dig into the hand, kneeling to do floor work (e.g. laying flooring), and striking an object with the hand like a hammer.

2) **Vibration** - Workers who use vibrating tools, machinery or equipment where vibration has not been controlled may put themselves at risk of MSIs. Stretched ligaments, decreased muscle strength and restricted blood flow are some of the effects on the body. Examples include using tools and equipment such as chipping hammers, sanders, lawnmowers, or operating equipment such as excavators, transport trucks and forklifts where vibration can be transmitted through the entire body.

3) **Insufficient lighting** - Workers need proper lighting to do their jobs safely and efficiently. Insufficient lighting can lead to workers using awkward postures to see their work. Glare from sunlight shining on a computer screen can cause eyestrain and affect a person's ability to see. Flickering fluorescent lights can cause headaches and eyestrain.

4) **Adverse temperatures** – Very warm and very cold work environments increase the physical demands of work.

The City is committed to taking proactive measures to help prevent MSIs. The City will use the following measures to identify and prevent MSIs:

Hazard assessments:
A hazard assessment is a systematic process used to identify, evaluate, and control existing and potential hazards to minimize the risk of incidents in the workplace. The City includes MSI risk factors in all methods of hazard assessments.

Workplace inspections:
The City identifies MSI risk factors through informal and formal workplace inspections. Formal workplace inspections include observations such as:

- Items stored at proper height.
- Lifting aids being used.
- Workers observed lifting in a safe manner.
- Are workers working in awkward or sustained postures for long periods of time.

Ergonomic assessments:
Ergonomic assessments are one of the best methods to evaluate a Worker's environment, tasks, and posture to identify risk factors for MSIs and improve workplace comfort, safety, and productivity. Upon request from Managers/Supervisors or the OH&S Committee/WH&S Representative an OH&S Advisor will conduct an internal ergonomic assessment. If MSI hazards are complex and cannot be identified, a more in-depth assessment may be required. Such assessments will be approved by the OH&S Manager and conducted by a trained individual with ergonomic expertise.

Office Ergonomic Self-Assessment Checklist:
The City has developed a voluntary checklist that is intended to highlight key aspects of a good ergonomics office work environment. It is an assessment tool that allows workers to consider various aspects of a workstation set-up. Once the checklist is complete it must be forwarded along to the Worker's Supervisor for review. The Office Ergonomic Self-Assessment Checklist can be found on the City's intranet webpage.

Building design and renovations:
Managers/Supervisors and City Engineers coordinating renovations or re-design of the workplace will ensure ergonomic considerations are proactively integrated into the design to prevent MSIs.

Equipment design:
Ergonomic considerations will be integrated into the modification, re-design or installation of equipment, machines, and tools.

Purchasing of equipment and devices:
Supply chain will consider ergonomic design and other safety features when purchasing equipment, machines, devices, and tools.

Preventative maintenance:
Preventative maintenance procedures are directly tied to preventing MSIs because they reduce the physical strain, awkward movements, and sudden failures that often cause these injuries. When equipment and tools are well-maintained they require less force to operate and movements are more predictable and controlled. Managers/Supervisors are required to oversee their Preventative Maintenance Program and ensure all equipment and tools are maintained in a safe operating condition.

TRAINING

MSI Certification:
The City will provide MSI certification training to all Workers. The training will be made available to workers online through Reach360, and there will be an opportunity for workers to attend the training in-person if they are not able to avail of the online training. The City's MSI certification training will cover the following topics:

- The early signs and symptoms of MSIs.
- The potential health effects.
- Reporting early signs and symptoms of MSIs, and concerns of potential MSI hazards.
- Specific and potential hazards and control measures (e.g., safe work practices and procedures, lifting equipment, PPE, etc.) to be used to prevent MSIs.
- How to modify the work or tasks to reduce the risk of MSIs, including when and how to use rest breaks and task variation.
- Healthy working postures.
- Proper body mechanics during manual material handling, if applicable.

Orientation:
MSI prevention is included on the City's orientation form and will be covered during initial hire orientations and Worker re-orientations.

Safe Work Practices and Procedures (SWPPs):
Workers will be trained in MSI prevention through their department's SWPPs. Training in SWPPs must be documented.

CONTINUOUS IMPROVEMENT

The City's MSI statistics and trends will be monitored by Occupational Health & Safety. This program will be reviewed at least every three (3) years and updated as required.

RESOURCES

All resources can be found on the St. Johns intranet webpage.

Forms

- Office Ergonomic Self-Assessment Checklist

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ELEMENT 14 – HARASSMENT PREVENTION, WORKPLACE VIOLENCE, & PSYCHOLOGICAL HEALTH & SAFETY

HARASSMENT PREVENTION, WORKPLACE VIOLENCE, & PSYCHOLOGICAL HEALTH & SAFETY

The City is committed to providing a safe a healthy workplace where the risk of violence, harassment and psychological hazards are eliminated. Where the risk of violence, harassment, and psychological hazards cannot be eliminated, control measures will be put in place.

DEFINITIONS

"**Workplace Violence**" means the attempted or actual exercise of physical force to cause injury to a Worker and includes threatening statements or behavior which gives a Worker reason to believe that they are at risk of injury.

"Family Violence" means one or more of the following acts or omissions committed against a Worker or their family member by another member:

a) An assault that consists of the intentional application of force that causes the Worker to fear for their safety but does not include an act committed in self-defense.
b) An intentional, reckless or threatened act or omission that causes bodily harm or damage to property.
c) An intentional, reckless or threatened act or omission that causes a reasonable fear of bodily harm or damage to property.
d) Forcible physical confinement without lawful authority.
e) Sexual assault, sexual exploitation or sexual molestation, or the threat of sexual assault, sexual exploitation or sexual molestation.
f) Conduct that causes the Worker to reasonably fear for their safety, including following, contacting, communicating with, observing or recording a person.
g) Conduct that causes psychological or emotional harm or a reasonable fear of that harm, including a pattern of behaviour the purpose of which is to undermine the psychological or emotional well-being of the Worker or their family member.
h) Conduct that controls exploits or limits the applicants access to financial resources for the purpose of ensuring the applicants financial dependency.
i) The deprivation of food, clothing, medical attention, shelter, transportation, or other necessaries of life.

"Harassment" means inappropriate vexatious conduct or comment by a person to a Worker that the person knew or ought to have known would cause the Worker to be humiliated, offended or intimidated.

"Sexual Harassment" means harassment that involves any unsolicited material, comments, gestures, of physical contact of a sexual nature that the individual knows or ought reasonably to know to be unwelcome, objectionable, or offensive. Sexual harassment includes sexual solicitation and may involve favors or promises of favors with the threat of reprisal for refusing.

"Bullying" means a form of harassment that involves the deliberate, persistent attempt to intimidate, demean, torment, control, isolate, or harm another person physically or mentally.

"Disrespectful Behaviour" means any actions, conduct, or comment that can reasonably be expected to cause humiliation offense, or other physical or psychological injury, including, but not limited to, harassment, discrimination, sexual harassment, sexual solicitation, and violence.

"Respectful Workplace" means a workplace that values diversity and inclusion; safety; dignity of a person; courteous conduct; mutual respect; fairness and equality; and collaborate working relationships.

"Psychological Health & Safety" means the promotion and maintenance of the highest degree of physical, mental and social well-being of Workers, and the prevention of psychological harm due to workplace factors.

"Vexatious" means being a source of irritation or annoyance.

"Reprisal" means any measure taken or threatened against a person as a result of making or being suspected of making an allegation or complaint or participating in or being suspected of participating in an investigation.

RESPONSIBILITIES

As per the City's Respectful Workplace Policy (Policy #: 03-05-19), the City recognizes its responsibility to build and maintain a respectful workplace where everyone has the right to be treated with dignity and respect and all workplace parties can complete their duties without fear of bullying, discrimination, harassment, or violence.

Managers are responsible for:

- Leading by example in promoting a positive, respectful, and psychologically safe workplace.
- Abiding by the Respectful Workplace Policy and informing Supervisors of the policy.
- Abiding by the City's Harassment Prevention Plan.
- Ensure workers in their department/division are annually trained in the City's Harassment Prevention Plan as per Section 24.2 (2) of the Newfoundland and Labrador OH&S Regulations.
- Assessing the workplace for the risk of violence in consultation with Supervisors, Workers, OH&S Committees/WH&S Representatives and Occupational Health & Safety.
- Ensuring Workplace Violence Risk Assessments and control measures are in place for their department/division.
- Assessing the workplace for psychological health and safety (PHS) hazards in consultation with Supervisors, Workers, OH&S Committees/WH&S Representatives, and Occupational Health & Safety.

Supervisors are responsible for:

- Leading by example in promoting a positive, respectful, and psychologically safe workplace.
- Informing Workers of the City's Respectful Workplace Policy.
- Abiding by the City's Harassment Prevention Plan.

- Annually training Workers in the City's Harassment Prevention Plan as per Section 24.2 (2) of the Newfoundland and Labrador OH&S Regulations. Training will be conducted through Reach360, and safety meetings for workers who do not have access to Reach360.
- Assessing the workplace for the risk of violence in consultation with Workers, OH&S Committees/WH&S Representatives and Occupational Health & Safety.
- Communicating Workplace Violence Risk Assessments to appropriate Workers.
- Assessing the workplace for PHS hazards in consultation with Workers, OH&S Committees/WH&S Representatives, and Occupational Health & Safety.
- Supporting Worker's PHS by implementing control measures for the identified PHS hazards.

Workers are responsible for:

- Promoting a positive, respectful, and psychologically safe workplace.
- Not engaging in bullying or workplace harassment, including social media bullying or sharing of disrespectful viral photos or videos.
- Abiding by the City's Respectful Workplace Policy.
- Following the City's Harassment Prevention Plan.
- Reporting harassment, violence, and/or psychological hazards to their Supervisor.
- Reporting all incidents to their Supervisor immediately.
- Participating in training related to workplace violence, harassment, and/or PHS, when asked.

OH&S Committees/WH&S Representatives are responsible for:

- Promoting a positive, respectful, and psychologically safe workplace.
- Assessing the workplace for the risk of violence and harassment.
- Assessing the workplace for PHS hazards.
- Participating in hazard assessments, when asked.
- Participating in the review of the City's Harassment Prevention Plan.
- Reporting all incidents to management immediately.

Human Resources are responsible for:

- Leading by example in promoting a positive, respectful, and psychologically safe workplace.
- Monitoring the City's Respectful Workplace Policy.
- Working with Managers to implement the Respectful Workplace Policy and Harassment Prevention Plan.
- Addressing workplace complaints as per the City's policies.
- Undertaking impartial, informal, and formal investigations as appropriate.

Occupational Health & Safety are responsible for:

- Leading by example in promoting a positive, respectful, and psychologically safe workplace.
- Annually reviewing the City's Harassment Prevention Plan to ensure its effectiveness.
- Advising management on legislative requirements pertaining to workplace violence, harassment, and PHS.
- Participating in hazard assessments.
- Participating in training related to workplace violence, harassment, and PHS.

Union/Association Executives are responsible for:

- Ensuring their own behavior complies with the City's Respectful Workplace Policy.
- Encouraging respectful conduct in the workplace.
- Providing advice, support, and assistance to Union/Association members as needed.

Contractors are responsible for:

- Adhering to the City's Respectful Workplace.
- Promoting a positive, respectful, and psychologically safe workplace.
- Reporting incidents involving workplace violence, harassment, and PHS to a City representative.

Visitors are responsible for:

- Promoting a positive, respectful, and psychologically safe workplace.
- Reporting incidents involving workplace violence, harassment, and PHS to a City representative.

HARASSMENT PREVENTION PLAN

Every Worker is entitled to employment free from workplace harassment. The City is committed to providing all Workers with employment free from workplace harassment and eliminating, where possible, or otherwise minimizing the hazard of workplace harassment. The City shall protect Workers from retaliation and provide support to Workers when workplace harassment occurs.

The City's Respectful Workplace Policy has been developed to help address and minimize the risk of workplace harassment. The purpose of the Respectful Workplace Policy is to confirm the City's commitment to creating and maintaining a healthy, safe, inclusive, and respectful workplace.

"Harassment" means inappropriate vexatious conduct or comment by a person to a Worker that the person knew or ought to have known would cause the Worker to be humiliated, offended or intimidated.

Harassment excludes the following and/or similar legitimate actions:

- Appropriate exercise and delegation of managerial authority, including legitimate performance reviews or matters within the normal disciplinary process of the City.
- Disagreements, misunderstandings, or normal workplace conflict that may occur between individuals, or differences of opinion between co-workers.
- Friendly teasing or bantering that is mutually acceptable and not offensive to others.
- Requesting medical documents in support of an absence from work.
- Implementing health and safety measures or inspecting workplaces.
- The legitimate use of disciplinary actions and/or other managerial responsibility essential to achieving efficiency of daily organizational operations.

The City's Harassment Prevention Plan and Respectful Workplace Policy is not intended to discourage a Worker from exercising their rights under the Human Rights Act, Criminal Code of Canada, or any other law of the Province or of Canada.

Application

The Harassment Prevention Plan applies to all workers, contractors, visitors, volunteers, students, suppliers providing materials to the City, and all persons accessing City services or City-operated facilities. This plan also applies to situations where Workers are threatened with and/or subject to harassment in the workplace from individuals who are not City's Workers. Additionally, the Harassment Prevention Plan applies to all work-related activities (e.g., work group chats, gatherings, work trips, City sanctioned social functions, etc.).

Reporting Workplace Harassment

What you do depends on how safe you feel to interact with the person(s) engaging in harassing behaviour. Human Resources provides advice and assistance to all Workers on matters relating to harassment and can help you determine the best approach to address your complaint.

- Tell the person(s) to stop if it is safe to do so. If you do not feel safe speaking to the person(s), document the details and reach out to your Supervisor, Union Representative (if applicable), and/or

Human Resources. This step is important because sometimes people do not realize that their actions are harmful and being told how their behaviour is inappropriate can stop it from becoming repetitive. Examples of what to say include, but are not limited to:

- "Please stop. That is offensive and not funny."
- "It may not be your intention, but [insert specific language/behaviour] is offensive to me. Please stop."
- "I don't appreciate it when you …"
- "That's inappropriate/unacceptable in a work environment."
- "You're making me uncomfortable."

Documenting the details of harassment as soon as possible is an important step because the details of the harassment can get blurry over time. Make sure to document:

- What happened.
- Who was there.
- Time and date.
- Location.
- What did you experience.
- How did it make you feel.
- Evidence (e.g., emails, text messages, post-it notes, etc.).

- Workers have the right to file a human rights complaint directly with the Newfoundland and Labrador Human Rights Commission. Where such a complaint is filed, the City will not undertake a parallel internal investigation, in order to avoid the possibility of different outcomes.

- As per the City's Respectful Workplace Policy, Managers/Supervisors are responsible for immediately notifying Human Resources when becoming aware of violence, discrimination, or any other form of harassment, regardless of whether the Worker involved wishes to pursue a complaint.

- Every Worker has the right to report, in good faith, incidents of disrespectful behaviour without fear of reprisal. Reprisal by any Worker or person against anyone shall not be tolerated.

Investigation Process

The investigation process will be followed in accordance with the City's Municipal Official Code of Conduct By-Law.

Training Process

It is the responsibility of Supervisors to educate and train workers on the City's Respectful Workplace Policy and Harassment Prevention Plan. Proof of training may include signed orientation records, documented safety meetings, meeting minutes, etc. Additionally, the Harassment Prevention Plan must be reviewed with Workers annually.

Confidentiality Statement

Any information obtained relating to workplace harassment, including personal information, will not be disclosed unless it is necessary for the purpose of an investigation, corrective action relating to the

complaint or where required by law including the Access to Information and Protection of Privacy Act, 2015.

Continuous Improvement

The City's Harassment Prevention Plan has been developed in accordance with the Newfoundland and Labrador OH&S Regulations Section 24.1 – 24.2. The Harassment Prevention Plan will be reviewed as necessary, but at least annually.

Contacts:

Title	Name	Contact Information
HR Advisor	Jason Chiasson	jchiasson@stjohns.ca
HR Advisor	Charity Lawrence	calawrence@stjohns.ca
HR Advisor	Bonnie Perry	bperry@stjohns.ca
Newfoundland and Labrador Human Rights Commission		humanrights@gov.nl.ca Phone: 709-729-2709

WORKPLACE VIOLENCE

Workplace violence is a critical safety concern for the City, particularly given the wide range of public-facing roles across municipal services. Workers may encounter challenging situations when interacting with residents, enforcing bylaws, or responding to emergencies, which can increase the risk of verbal abuse, threats, or physical harm. To address this, the City emphasizes prevention through risk assessments, worker training, incident investigation processes, and support through Human Resources.

Workplace Violence Risk Assessment

Managers/Supervisors are responsible for assessing the risk of workplace violence in their department/division in consultation with Workers, the OH&S Committee/WH&S Representative, and Occupational Health & Safety. The risk assessment must include the following:

- Previous instances of violence in the workplace.
- Violence experienced in similar workplaces.
- The location of the work.
- Type of work being performed.
- Risk of family violence.
- Workplace characteristics including demographics, culture and the presence of new workers.
- Issues raised by OH&S Committees/WH&S Representatives.

The risk assessment must be documented on a standardized template that includes:

- The date(s) the assessment was completed, reviewed or updated.
- Description of the work or location being assessed.
- Identification of workplace violence hazards.
- Evaluation of the risks for the hazard(s) identified.
- Corrective actions to be taken, the person(s) responsible for the actions, and the date for completion or follow-up.
- Signature and date the assessment was completed.

Reporting Workplace Violence

If a person feels that their life is in danger, they must contact 911 immediately. All incidents involving workplace violence must be reported to the Supervisor when it is safe to do so. Additionally, all incidents involving workplace violence must be reported to Human Resources.

Investigation Process

Incidents involving workplace violence will be investigated by Occupational Health & Safety and Human Resources in consultation with the RNC (when necessary). The findings from the investigation will be communicated with the appropriate workplace parties and Supervisors will be responsible for ensuring corrective actions outlined in the investigation are implemented.

Family Violence

The City recognizes that family violence may impact Workers. If the City becomes aware or ought reasonably to be aware that family violence that would likely expose a Worker to a physical injury may

occur in the workplace, the City will take every precaution reasonable in the circumstances for protection of the Worker. The City shall meet their legal responsibility in a manner that:

- Is sensitive to, and support of, the needs of Workers who are in family violence situations.
- Provides access to information regarding resources to support the physical safety, emotional health, and basic material and financial needs of Workers.
- Is protective of the health and safety of all Workers that may be placed at risk as a result of family violence situations impacting the workplace while respectful of the privacy rights of the Worker in a family violence situation.

Training Process

It is the responsibility of Managers/Supervisors to educate and train Workers who may be exposed to the risk of violence about the nature of the risk and any precautions to be taken. This includes, information relating to the risk of violence from person(s) who have a history of violent behaviour and who Workers are likely to encounter in the course of their work (where applicable). Proof of training may include signed orientation records, documented safety meetings, meeting minutes, etc.

Confidentiality Statement

Any information obtained relating to workplace violence, including personal information, will not be disclosed unless it is necessary for the purpose of an investigation, corrective action relating to the incident or where required by law.

PSYCHOLOGICAL HEALTH & SAFETY

Psychological health & safety (PHS) is a state of wellbeing in which Workers realize their own abilities, can cope with the normal stresses of life, work productively, and are able to make a positive contribution to their workplace. The City is committed to the promotion of PHS and the prevention of psychological harm. Fostering a PHS workplace is essential to the success and sustainability of the City. The City will take every reasonable precaution to ensure Workers are protected from hazards that are a risk to their mental health.

The City will continuously asses the workplace for PHS hazards in consultation with Managers, Supervisors, Workers, and OH&S Committees/WH&S Representatives. The City will identify PHS hazards by using the following resources:

- Workplace inspections.
- Tracking tends involving harassment and workplace violence.
- Evaluating Worker concerns during the Employee Engagement Survey.
- Identifying risks of PHS within hazard assessments.

The City is committed to supporting Worker's PHS by using the following control measures:

- Employee and Family Assistance Program (EFAP) that offers 24/7, 365-day access to EFAP support, tools and recourses. The EFAP is accessible online through myeapsupport.com or by calling 1 (844) 880-9142.
- Developing PHS Risk Assessments in consultation with CSA Standard Z1003-13 "PHS in the Workplace."
- Posting information about the EFAP in a prominent location across all City buildings.
- Promoting open communication regarding mental health.
- Providing mental health training to selected Workers.
- Conducting safety meetings regarding psychological risk factors and what PHS hazards exist.
- Building a supportive leave culture.
- Addressing any workload imbalances.
- Offering flexible work arrangements where possible.
- Cultivating a positive workplace culture.

Workplace Factors that Contribute to the Promotion or Harm of PHS (CSA-Z1003-13):

1. **Psychological Support**
   A work environment where coworkers and Managers/Supervisors are supportive of Workers' mental health concerns and respond appropriately as needed.

2. **Workplace Culture**
   A work environment characterized by trust, honesty and fairness.

3. **Clear Leadership and Expectation**
   A work environment where there is effective leadership and support that helps Workers know what they need to do, how their work contributes, and when change is coming.

4. **Civility and Respect**
   A work environment where Workers are respectful and considerate in their interactions with one another, as well as with Contractors and Visitors.

5. **Psychological Competencies and Requirements**
   A work environment where there is a good fit between Workers' interpersonal and emotional skills and the requirements of their job.

6. **Growth and Development**
   A work environment where Workers receive encouragement and support in the development of their interpersonal, emotional and job skills.

7. **Recognition and Reward**
   A work environment where there is acknowledgement and appreciation of Workers' efforts in a fair and timely manner.

8. **Involvement and Influence**
   A work environment where Workers are included in discussions about how their work is done and how important decisions are made.

9. **Workload Management**
   A work environment where tasks and responsibilities can be accomplished successfully within the time available.

10. **Engagement**
    A work environment where Workers feel connected to their work and are motivated to do their job well.

11. **Balance**
    A work environment supportive of the need for balance between the demands of work, family and personal life.

12. **Psychological Protection**
    A work environment where Workers' psychological safety is ensured.

13. **Protection of Physical Safety**
    A work environment where management takes appropriate action to protect the physical safety of Workers.

PHS Risk Assessment

It is the responsibility of Managers and Supervisors to identify hazards of psychosocial nature in their department/division and implement control measures to reduce the risk. PHS risk assessments must be developed in consultation with Occupational Health & Safety, Workers, OH&S Committees/WH&S Representatives, and CSA Standard Z1003-13. The risk assessment must be documented on a standardized template that includes:

- The date(s) the assessment was completed, reviewed or updated.
- Description of the work or location being assessed.
- Identification of PHS hazards.
- Evaluation of the risks for the hazard(s) identified.
- Corrective actions to be taken, the person(s) responsible for the actions, and the date for completion or follow-up.
- Signature and date the assessment was completed.

ST. JOHN'S

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ELEMENT 15 – MANAGEMENT REVIEW, RECORDS, AND STATISTICS

MANAGEMENT REVIEW, RECORDS, AND STATISTICS

Accurate record keeping is essential for implementing, maintaining, and evaluating an OH&S Program. The City requires that all safety related issues be documented to establish consistent record keeping within the workplace. Record keeping ensures compliance with Provincial OH&S Regulations, as well as demonstrating due diligence.

Safety related documentation and records will be monitored by Occupational Health & Safety. Medical records and return to work documentation will be monitored by the Disability Case Manager and Occupational Health Nurse. All sensitive documentation will be kept confidential in accordance with the Access to Information and Protection of Privacy Act, 2015, and Personal Health Information Act.

The City is committed to the effective management of OH&S documentation, statistics and record keeping, to determine opportunities for continual improvement and mitigate and control workplace hazards. Managing OH&S records and statistics will identify trends and help find problems before an accident takes place. It also demonstrates due diligence by allowing management to track OH&S activities to ensure compliance with the City's OH&S Program and with OH&S legislation.

This procedure outlines how the City will maintain OH&S records and the scope and frequency of OH&S statistical reviews. It also outlines the responsibilities of Managers, Supervisors, Workers, and the OH&S Committee/WH&S Representative in managing OH&S records while protecting confidential health information.

RESPONSIBILITIES

The City will ensure effective OH&S documentation management is completed and provide training on how to manage OH&S documentation. The City is committed to the protection of confidential personal health information.

Managers and Supervisors are responsible for:

- Participating in the development and review of statistical summaries.
- Providing feedback regarding safety statistics in their department/division.
- Coordinating with the OH&S Committee/WH&S Representative in determining recommendations for any deficiencies found in the statistical summaries.
- Communicating the results of statistical summaries to Workers.

Workers are responsible for:

- Cooperating with persons carrying out any OH&S activities.
- Reporting any potential hazards to their Supervisor.
- Reviewing OH&S documentation when provided.

OH&S Committees/WH&S Representatives are responsible for:

- Participating in OH&S activities when/where required.
- Making recommendations and following up to ensure the recommendations are effective.

- Documenting any discussions regarding statistical reviews.

Occupational Health & Safety are responsible for:

- Monitoring all safety statistics in consultation with Managers and Supervisors.
- Scheduling meetings with departments/divisions to review safety statistics. All meetings must be documented.
- Providing management with leading and lagging indicators in their respective departments/divisions.

FREQUENCY OF OH&S STATISTICAL SUMMARIES

Annually

The OH&S Manager in consultation with the Senior Leadership Team will meet annually to review OH&S statistics to determine if there are opportunities for continuous improvement, corrective actions, and/or additional support needed.

Quarterly

Occupational Health & Safety will conduct quarterly Safety Stewardship Meetings with Managers/Supervisors in departments/divisions identified as high-risk and experiencing elevated incident rates.

Monthly

The OH&S Coordinator will request monthly statistics from Managers/Supervisors in each department/division and compile the data into monthly safety summaries.

The data will be used to determine leading and lagging indicators in each department/division. Monthly safety summaries will be completed on a standardized template, and will include the following information:

- The names of the individuals involved.
- The month for which the monthly safety summary is being kept for.
- Number of Workers hired during the month and the number of orientations completed.
- Number of toolbox talks completed.
- Number of formal workplace inspections completed.
    - Number of unsafe acts/conditions identified through workplace inspections.
- Number of incidents.
- Number of high risk work activities completed (working at heights, confined space entry, traffic control, trenching and excavating, TDG).
- Number of regulation offences.
- Number of work refusals.

All documentation must be retained as per the City's Records and Information Management Policy.