

City of St. John's Corporate and Operational Policy Manual

Policy Title: Occupational Health and Safety Policy	Policy #: 03-07-10
Last Revision Date: January 2, 2025	Policy Section: Human Resources – Health and Safety
Policy Owner: Shauna Power, Manager, Occupational Health & Safety	

1. Policy Statement

The City of St. John's ("**the City**") is committed to providing a safe and healthy work environment for all Employees, Contractors and Visitors. The City will take all reasonable steps to prevent work-related injuries and illnesses by identifying Hazards, assessing risks, implementing effective safeguards and promoting a culture of health and safety across all Worksites.

This Policy establishes the City's commitment to meeting its obligations under the Newfoundland and Labrador Occupational Health and Safety ("**OH&S**") Act and Regulations by supporting effective participation and communication with OH&S Committees and Worker Health and Safety ("**WH&S**") Representatives.

2. Definitions

"Contractor" means an individual or business that performs work for the City under a contract, including subcontractors.

"Employee" means any person employed by the City as a permanent, term, part-time, casual, seasonal, temporary or student worker and members of Council.

"Hazard" means any source or situation with the potential to cause injury, illness or property damage.

"Incident" means an unplanned event that results in, or could have resulted in, injury, illness, damage or loss.

“Management” (or **“Manager”**) means Employees 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.

“Occupational Health and Safety Act and Regulations” means the legal framework that governs health and safety in the Province of Newfoundland and Labrador.

“Occupational Health and Safety Committee” means a committee established by the City to support communication and collaboration between Employees and Management on OH&S matters and to carry out functions as required under the Newfoundland and Labrador OH&S Act and Regulations.

“Occupational Health and Safety Program” means the City’s OH&S framework, including the processes, practices and procedures the City uses to identify and control Hazards, meet legislative requirements, strengthen prevention and promote health and safety awareness.

“Supervisors” means the individuals within Management with authority over a particular area, shift or worker, including such positions as forepersons, operation assistants, superintendents, directors 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.

“Visitor” means any person who is not an Employee or Contractor who enters a Worksite and/or takes part in City work activities.

“Worker Health and Safety Representative” means a representative established to support communication between Employees and Management on OH&S matters and to carry out functions as required under the Newfoundland and Labrador OH&S Act and Regulations.

“Worksite” means any location where City work occurs, including City-owned or City-operated facilities and any other location where Employees or contractors perform work for the City.

3. Policy Requirements

3.1 Compliance

- a) The City shall take all reasonable steps to ensure the health and safety of Employees, Contractors and Visitors by identifying and mitigating Hazards and ensuring compliance with the Newfoundland and Labrador Occupational Health and Safety Act.
- b) The City shall implement an OH&S Program that adheres to the requirements of the Newfoundland and Labrador OH&S Act and Regulations.
- c) The City shall continuously monitor and evaluate its OH&S Program to ensure its effectiveness.
- d) The City shall make any necessary revisions to the OH&S Program to achieve continuous improvement in the City’s health and safety practices and procedures.
- e) All Employees shall comply with the Newfoundland and Labrador Occupational Health and Safety Act and Regulations and with the City’s OH&S requirements, including the City’s OH&S Program documentation and all related policies and procedures.

3.2 Education, orientation and training

- a) The City shall provide the information, instruction, training, supervision and facilities needed to promote understanding of the OH&S Program amongst all Employees.
- b) The City shall provide OH&S orientation and training, including general orientation for new Employees and job-specific training, as needed.
- c) The City shall ensure Employees complete the required OH&S training and shall support Employees in applying that training in their work.

3.3 Inspections and Incident Investigations

- a) Supervisors shall monitor workplaces for Hazards and conduct inspections, as required.
- b) Employees shall maintain day-to-day safety awareness, participate in informal inspections as part of routine work and report Hazards to their Supervisor.
- c) Supervisors shall investigate Incidents, complete required Incident investigation documentation and ensure corrective measures are implemented.
- d) Supervisors shall ensure the City implements actions identified through Incident investigations.

3.4 OH&S Committees and Worker Health and Safety Representatives

- a) The City shall establish OH&S Committees and WH&S Representatives to support communication between Employees and Supervisors on health and safety issues.
- b) The City shall cooperate with and provide all required resources to OH&S Committees and WH&S Representatives.
- c) OH&S Committees and WH&S Representatives shall participate in workplace inspections, review Incident investigation reports and promote health and safety awareness.

3.5 Contractors and Visitors

- a) Contractors and Visitors shall follow applicable OH&S Program requirements and report Hazards and Incidents to a City representative immediately.
- b) The City must ensure Contractors comply with the Occupational Health and Safety Act and Regulations and with the City's OH&S requirements, consistent with the City's role as principal Contractor, where applicable.

3.6 Review and Evaluation

- a) The City shall monitor and evaluate the OH&S Program to ensure effectiveness.
- b) The City shall make necessary revisions to the OH&S Program to achieve continuous improvement of health and safety practices.

- c) The City shall review and sign the OH&S Policy annually and post it in a prominent location at each worksite.

4. Application

This Policy applies to all City Employees, as well as Contractors, volunteers and Visitors while they are at City worksites or facilities or taking part in City work activities.

5. Responsibilities

5.1 Supervisors shall be responsible for:

- a) Implementing and communicating the requirements of the City's OH&S Program;
- b) Complying with the Newfoundland and Labrador OH&S Act and Regulations;
- c) Developing and/or communicating safe work practices and procedures in their area of responsibility;
- d) Identifying Hazards and risks and communicating the appropriate controls to Employees in their area of responsibility;
- e) Participating in investigating Incidents, completing required Incident Investigation Reports and ensuring implementation of corrective measures;
- f) Ensuring Employees have access to and complete the education and training required to perform their duties safely;
- g) Cooperating with OH&S Committees and WH&S Representatives;
- h) Leading by example and following all safe work practices and procedures; and
- i) Providing the resources necessary for Employees to bring forward health and safety concerns.

5.2 Employees shall be responsible for:

- a) Complying with the requirements of the City's OH&S Program;
- b) Following all safe work practices and procedures as communicated by Management;

- c) Reporting all Hazards and Incidents to Management;
- d) Completing required OH&S training; and
- e) Participating in Incident investigations, workplace inspections and meetings related to health and safety, as necessary.

5.3 OH&S Committees/WH&S Representatives shall be responsible for:

- a) Making recommendations for the establishment of health and safety practices and procedures;
- b) Reviewing elements of the OH&S Program and making recommendations where necessary;
- c) Identifying unhealthy and unsafe aspects of the workplace and recommending corrective measures;
- d) Helping to identify and resolve Employee health and safety concerns;
- e) Participating in Incident investigations and workplace inspections; and
- f) Leading by example and following the requirements of the City's OH&S Program.

5.4 Contractors shall be responsible for:

- a) Complying with the Newfoundland and Labrador OH&S Act and Regulations;
- b) Complying with the City's OH&S Program;
- c) Ensuring their workers and subcontractors are provided with tools and equipment that are in safe working condition;
- d) Reporting Hazards and Incidents to the designated City representative; and
- e) Complying with all safety requirements the City deems necessary.

5.5 Visitors shall be responsible for:

- a) Following the City's health and safety practices and procedures; and
- b) Reporting Hazards and Incidents to a City representative immediately.

6. References

- Occupational Health and Safety Act and Regulations
- 507.00 PRIME Path 2 Employers (OHS Certification) Criteria

- City of St. John's Occupation Health and Safety Program Manual
- Disability Management Policy (**03-07-28**)
- Contractor Health and Safety Policy (**03-07-43**)

7. Approval

- Position Title of Policy Owner: Manager, Occupational Health & Safety
- Position Title of Policy Writer: Policy Analyst
- Date of Approval from
 - Corporate Policy Committee: May 27, 2026
 - Senior Leadership Team: May 29, 2026
 - Committee of the Whole:
- Date of Approval from Council: June 2, 2026

8. Monitoring and Contravention

The Human Resources Division shall monitor the application of this Policy and ensure it is reviewed and signed **annually**.

Any contravention of this Policy may be brought to the attention of the Human Recourses Division, the office of the City Solicitor and/or the Office of the City Manager for further investigation and appropriate action, which may include, but is not limited to, legal action and/or discipline up to and including dismissal.

9. Review Date

Annually.

City Manager

Date