



GAZZOLA PAVING LIMITED

Legislation and Other Requirements Policy Statement

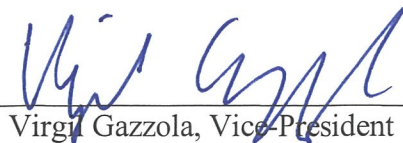
Gazzola Paving Limited will identify all legislative requirements applicable to the scope of work including the Occupational Health and Safety Act and all applicable legislations, regulations, standards and guidelines.

It will be the responsibility of Gazzola Paving Limited to maintain compliance with all applicable legislative and other requirements and ensuring that all documentation related to the legislative and other requirements is up to date.

Gazzola Paving Limited will ensure the availability of relevant legislations and all other posting requirements in all work locations visibly posted for all employees.

To that purpose, Gazzola Paving Limited will ensure that a system is established to document, maintain and keep records on all Health and Safety information required by the Company's Health and Safety Management System and internal policies and procedures.

Gazzola Paving Limited will regularly evaluate compliance with all legislative and other requirements that are applicable to the scope of work. The goal of the evaluation is to identify gaps and opportunities for improved compliance.



Virgil Gazzola, Vice-President

March 10, 2023

Date



GAZZOLA PAVING LIMITED Return to Work Policy Statement

The focus of Gazzola Paving Limited is to implement an effective Return to Work Program (RTW) that will ensure the well-being of our most valuable resource, our workers. This RTW program is a temporary measure (in some extreme cases - permanent) that will facilitate a safe and early return to work in the event of a disabling workplace accident and provide every opportunity for injured workers to return to gainful employment.

The primary goal of a RTW plan is a return to the pre-injury job as soon as possible. By comparing the physical demands of the job and the functional abilities, the RTW coordinator, supervisor and the employee can determine if the job needs modifying and if accommodations would be required.

The RTW Program will facilitate a safe and early return to work for workers who have sustained a workplace injury while employed with our company while providing every opportunity for injured workers to return to gainful employment in the event of a disabling workplace accident.

Once an injured worker has been placed on an RTW program, the supervisor for that worker along with the return to work coordinator will be expected to follow the program with the injured worker and keep Management updated as required.

This Program can only be successful if there is commitment, cooperation and communication between the employer and workers and as necessary the treating physician, health care providers and the Workplace Safety and Insurance Board (WSIB).

Assigning ownership in any RTW Program is vital in achieving desired results. As such, identifying and understanding each party's role and responsibility is the first key.

The RTW Program Coordinator will ensure regular communication exists between Worker, Supervisor and the Health Care Provider.

The Injured Worker will return all completed documentation provided from the health care provider, follow the functional abilities recommendations from the completed third page of the Form 8 and any modified duties provided by the company.

The Health Care Provider will provide medical treatment to an injured worker while adequately completing the Form 8 during the initial visit and provide the completed third page of the Form 8 to the worker. This third page represents the functional abilities information found during the assessment. Every subsequent visit, the physician will complete a functional Abilities Form provided by the injury party.

The WSIB will monitor the progress of the workers return to work and provide assistance if either the employer or the workers have any difficulty or dispute concerning either parties' cooperation with the RTW. Either party could contact the WSIB for assistance. This includes the assistance of a WSIB assigned Return to Work Mediator who will assist both workplace parties in resolving any or all disputes that need to be addressed.

The success of our RTW program is essential to provide every opportunity for injured workers to return to gainful employment and will provide us with the opportunity to accommodate an injured worker and facilitate the goal of returning a worker to his or her pre-injury duties as soon as possible.



Virgil Gazzola, Vice-President

March 10, 2023

Date



GAZZOLA PAVING LIMITED

Workplace Harassment Prevention Policy Statement

Workplace Harassment

Workplace Harassment is defined to mean “engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome or sexual harassment”. The following examples as cited from the Canadian Human Rights Commission are to be considered different forms of harassment. It can include comments or actions related to race, national or ethnic origin, colour, religion, age, sex, marital status, family status, disability, pardoned conviction, or sexual orientation.

Sexual Harassment

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

A reasonable action taken by an employer or supervisor relating to the management and direction of its workplace is not considered Workplace Harassment.

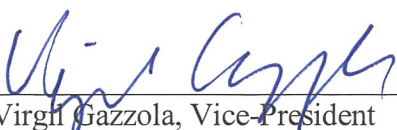
Gazzola Paving Limited recognizes the right of workers to work environment free of workplace harassment. Gazzola Paving Limited is committed to a workplace that values people and is free from Workplace Harassment. Every employee, contractor, and/or visitor in our workplace will be treated fairly and with respect. It is the responsibility of senior management, managers, supervisors, workers, contractors and visitors to ensure that a harassment free workplace is fostered and maintained.

Successful implementation of this policy will be ensured through effective planning, application, open communications and monitoring of procedures regarding the prevention of Workplace Harassment. All workplace parties will receive training regarding standards of workplace behaviour, their roles and obligations, and procedures for dealing with their concerns and issues.

Any potential situation of harassment that can affect the workplace or another worker shall be immediately reported to their supervisor or directly to Senior Management. All of these incidents shall be investigated and where appropriate measures will be taken.

Retaliation against persons who bring a complaint of harassment is strictly prohibited and will be dealt with accordingly.

A complaint of Workplace Harassment that is intentionally fraudulent, frivolous or malicious may be subject to disciplinary action.



Virgil Gazzola, Vice-President

March 10, 2023

Date



GAZZOLA PAVING LIMITED

Workplace Violence Prevention Policy Statement

For the purpose of this Policy, the term Workplace Violence as defined in the Occupational Health and Safety Act is as follows:

Workplace Violence

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

Gazzola Paving Limited recognizes the right of workers to work environment free of workplace violence. Gazzola Paving Limited strives to provide all employees, suppliers, contractors and visitors with an environment free of Workplace Violence. Mutual respect must be the basis of interaction, cooperation and understanding among all staff and/or contractors. Gazzola Paving Limited will not tolerate or condone behaviour that is likely to threaten the health and safety of any of our workers or contractors. This policy applies to all business operations and personnel as well as social events that are organized by or on behalf of the company.


Acts of Workplace Violence can take the form of either physical contact or threat of physical contact. They may occur as a single incident or may involve a continuing series of incidents. Abuse in any form destroys worker confidence and lowers workplace morale. This in turn reduces productivity and can impact quality of life.

Any potential situation of violence that can affect the workplace or another worker shall be immediately reported to their supervisor or directly to Senior Management. All of these incidents shall be investigated and based on the findings appropriate measures will be taken, including disciplinary action and contacting of local authorities.

Successful implementation of this policy will be ensured through effective planning, application, open communications and monitoring of procedures regarding the prevention of Workplace Violence. All workplace parties will receive training regarding standards of workplace behaviour, their roles and obligations, and procedures for dealing with their concerns and issues.

Retaliation against persons who bring a complaint of actual or perceived violence is strictly prohibited and will be dealt with accordingly.

A complaint of Workplace Violence that is intentionally fraudulent, frivolous or malicious may be subject to disciplinary action.



Virgil Gazzola, Vice-President

March 10, 2023

Date

Section 13-1 - Legislation and Other Requirements

PURPOSE

To identify and ensure compliance with the most current versions of all legislative, regulations, standards and other requirements that apply to the scope of operations by Gazzola Paving Limited.

SCOPE

The procedure covers all legislations, regulations, standards, guidelines or any other requirement that may be applicable to the scope of operations of Gazzola Paving Limited.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Identify all legislations, regulations and other requirements applicable to the scope of operations.
- Monitor compliance and ensure all Health and Safety documentation are up to date with the most current version of all legislations, regulations and other requirements applicable to the scope of work.
- Advise Senior Management of any changes to the legislations and other requirements and determine the corrective action needed to remain within compliance.
- Conduct an annual evaluation of compliance with all legislations, regulations, standards and any other requirements that apply to the scope of operations.
- Ensure Health & Safety Posting Boards are maintained with appropriate postings in all work locations that are clearly visible.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Assist in developing corporate health and safety orientation documentation, policies and procedures where required.
- Distribute and communicate information to the appropriate parties

Senior Management Responsibilities:

- Ensure the applicable legislations, regulations and other requirements to the scope of operations are identified
- Ensure the Company remains within compliance with the most current and up to date versions of all applicable legislations, regulations, standards and other requirements.
- Review and approve any changes needed to remain in compliance with the most current and up to date versions of all applicable legislations, regulations, standards and other requirements.
- Ensure all company employees receive the appropriate regarding any impacting changes in the Legislations and other requirements.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Ensure that the equipment, materials and protective devices are provided, maintained in good condition and used as prescribed.
- The measures and procedures prescribed are carried out in the workplace;

Section 13-1 - Legislation and Other Requirements

Superintendent Responsibilities:

- Ensure the Health & Safety Posting Board on his/her project is complete with all appropriate postings that are clearly visible.
- Ensure Project compliance with all legislative and other requirements through Site Inspections and correction of any non-compliance identified
- Communicate with all workers any impacting changes in the Legislations and other requirements as required.
- Ensure, where reasonably possible, that every Subcontractor, worker and visitor at the workplace complies with all applicable legislations, regulations and any other requirements including The Occupational Health and Safety Act and Construction Regulations.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Ensure the Health & Safety Posting Board on his/her project is complete with all appropriate postings that are clearly visible.
- Assist the Site Superintendent in Inspections and correction of any non-compliance identified to ensure site compliance with the legislations and all other requirements.
- Ensure, where reasonably possible, that every Subcontractor, worker and visitor at the workplace complies with all applicable legislations, regulations and any other requirements including The Occupational Health and Safety Act and Construction Regulations.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Workers Responsibilities:

- Follow and remain in compliance with all applicable legislations, regulations and any other requirements including The Occupational Health and Safety Act and Construction Regulations.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.\

PROCEDURE

Gazzola Paving Limited has identified the following legislations and regulations to be applicable to the scope of Operations:

Ontario Health and Safety Regulations

- The Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulation 213/91 – Construction Projects
- Ontario Regulation 851 – Industrial Establishments
- Ontario Regulations 297/13 – Health and Safety Awareness Training
- Ontario Regulation 420/21 – Notices and reports under sections 51 to 53.1 of the Act

Section 13-1 - Legislation and Other Requirements

- Ontario Regulations 490/09 – Designated Substance
- Ontario Regulation 164/99. - Ontario Electrical Safety Code, (Electrical Safety Authority)
- Ontario Regulation 572/99 – Training requirements for certain skill sets and trades
- Ontario Regulation 860 –WHMIS Workplace Hazardous
- Ontario Regulation 278/05 – Asbestos
- Ontario Regulations 833 -Biological or Chemical Agents, Control of Exposure
- Ontario Regulation 632/05 –Confined Space Regulation
- Ontario Regulation 381/15 - Noise
- Ontario Regulation 1101 (WSIB) – First Aid Requirements
- WSIA – Workplace Safety and Insurance Act
- Smoke Free Ontario Act
- WSIB Regulation 035/08 – Return to work

Technical Safety and Standards

- Technical Safety and Standards Act 2000 – TSSA
- Canadian Standards Association - CSA
- Ontario Regulation 211/01 – Propane Storage and Handling
- Ontario Regulation 213/01 – Fuel Oil

Employment Standards

- Ministry of Labour Employment Standards Act 2000

Environmental

- Environmental Protection Act R.S.O. 1990
- Ontario Regulation 347 – General Waste Management
- Ontario Regulation 360 – Spills
- Ontario Regulation 361/98 – Motor Vehicles
- Canadian Environmental Protection Act
- Ontario Water Resources Act
- Dangerous Goods Transportation Act R.S.O. 1990
- Nuclear Safety and Control Act
- Canadian Net-Zero Emissions Accountability Act

Note: There may also be any additional Municipal or Regional regulations that are applicable to Gazzola Paving Ltd. and information should be sought in each jurisdiction prior to beginning a project.

The Health and Safety Coordinator will be responsible for monitoring any updates to the applicable legislations and regulations applicable the scope of operations using the government websites and publications to ensure compliance with all applicable legislations, regulations and other requirements.

The Health and Safety Coordinator will advise Senior Management of any changes to the Legislations and Regulations that may affect the operations of Gazzola Paving Limited. Assessment of the changes and subsequent actions must be taken to ensure all documentation related to legislation, regulations, standards and any other requirements are in compliance and up to date

Section 13-1 - Legislation and Other Requirements

Posted Health & Safety Material

The following postings must be visibly posted on the Health and Safety Posting Boards in all work locations where Gazzola Paving Limited is performing work:

- Health & Safety Policy
- Workplace Violence and Harassment Policy
- JHSC/H&S Representative names and work locations
- Emergency Contact Numbers
- Emergency Procedure/ Plan
- OH&S Act and Regulations for Construction Projects
- OH&S Act and WHMIS Regulations
- Regulation 1101
- Form 82 - In Case of Injury
- Health and Safety at Work - Prevention Starts Here Poster
- Form 1000
- Map to Nearest Hospital
- First Aid Certified Employees Names and Certificates
- Location of eye wash station
- MOL Orders if any
- Active Work Permits if any
- Other Health & safety related information

Evaluation of Compliance

Evaluation of compliance with all legislations, regulations and other requirements will be done annually after related material has been gathered. The evaluation, in the form of a gap analysis will identify future or immediate changes required or training needs to remain within regulatory compliance. Records of the evaluations of legislative compliance will be kept on the Annual Report.

RECORDS

Records of the evaluations of compliance with the Legislation and other requirements will be recorded and kept as part of the Annual Report..

COMMUNICATION

All information concerning changes to the Legislation and other requirements will be communicated by management and the Joint Health and Safety Committee/Health and Safety Representative on a regular basis. Management and the Joint Health and Safety Committee/Health and Safety Representative will regularly monitor each health and safety bulletin board to ensure all health and safety information is posted and updated.

Section 13-2 - Workplace Violence and Harassment

PURPOSE

The Workplace Violence and Harassment Prevention Policies and Programs have been developed to communicate the accepted corporate health and safety principles. It establishes the right of workers to a workplace free of violence and harassment and requires employers to take positive action to prevent any form of these issues in the workplace.

SCOPE

The Workplace Violence and Harassment Prevention Policies are to be regarded by all workplace parties as directives for compliance with the Health and Safety Manual.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Develop a corporate violence and harassment policy statement.
- Ensure all company employees receive the appropriate training and workplace specific Safe Work Practices regarding Violence and Harassment prevention.
- Review, update and provide the corporate violence and harassment policy statement to Senior Management annually.
- Distribute and post corporate violence and harassment policy statement.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Assist in developing corporate violence and harassment training documentation, policies and procedures where required.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.

Senior Management Responsibilities:

- Endorse the corporate violence and harassment policy statements.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- The measures and procedures prescribed are carried out in the workplace;

Project Manager Responsibilities:

- Enforce the violence and harassment policy statement, programs and corporate expectations.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Section 13-2 - Workplace Violence and Harassment

Superintendent Responsibilities:

- Conduct a workplace violence assessment as it relates to all workplace locations and the head office.
- Assist in conducting incident investigations where reports of workplace Violence and or Harassment have been identified.
- Review findings with each required Foreman to ensure identified and correct each unsafe condition.
- Assist in the follow-up on the findings and correction of each unsafe condition.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Ensure the violence and harassment policy statement, practices, procedures and corporate expectations are met.
- Assist in conducting incident investigations where reports of workplace Violence and or Harassment have been identified.
- Ensure, where reasonably possible, that every Subcontractor, worker and visitor at the workplace complies with all Occupational Health and Safety Act and Regulations.
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of,
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for the protection of the worker.

Workers Responsibilities:

- Mutual respect must be the basis of interaction, co-operation and understanding among all workplace parties
- Advise the Foreman if experiencing any difficulties with assigned tasks, or if assigned tasks are beyond perceived limitations or medically not capable of performing tasks.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

PROCEDURE

Required programs, policies or procedures associated with the prevention of workplace violence and/or harassment have been developed and reviewed to ensure compliance with the Occupational Health and Safety Act and Applicable Regulations.

Specific Corporate Workplace Violence and Harassment Prevention Policies. An annual review will be conducted to each policy and is to be signed and dated by **Senior Management**, distributed by the **Health and Safety Coordinator** and implemented by all **Superintendent** and each **Foreman**.

Section 13-2 - Workplace Violence and Harassment

Workplace Violence Assessments will be conducted using **(13-2-1-1 Form)** for developed for all appropriate locations by the **Health and Safety Coordinator**. On the construction sites by the **Superintendent** or competent designate as part of the Pre-Job Construction Activities & Violence Risk Assessment Form. A annual review of these assessments will be conducted to ensure all programs, polices compliance procedures and training is appropriate and maintained.

The **Superintendent** and/or **Foreman** will conduct a Workplace Investigation to determine contributing factors, root cause and follow up actions required where situations of potential Workplace Violence and/or Harassment have been reported.

Failure to comply may result in progressive discipline up to and including termination with cause, If Progressive Discipline is deemed necessary, the **Superintendent** or **Senior Management** will ensure that the appropriate people are assembled and the documentation is recorded. All related documents must be forwarded to the **Health and Safety Coordinator** immediately for review and filing.

DISTRIBUTION

Distribution of the Workplace Violence and Harassment Prevention Programs, Policies will be as follows:

1. Reviewed with new employees during the Orientation Process
2. Posted on all Health and Safety Boards and other locations deemed appropriate

RECORDS

All documentation and records associated with workplace violence and harassment prevention will be maintained on file indefinitely.

Section 13-2-1 - Workplace Violence Prevention Program

PURPOSE

The purpose of Workplace Violence Prevention Policy and Program is to ensure that Senior Management, Project Managers, Superintendents, Foreman and Workers, as well as subcontractors understand our policy and their roles and responsibilities as they relate to violence prevention in the workplace. In addition, to ensure that risks of violence to employees are identified and eliminated or minimized through the implementation of prevention programs and/or practices.

DEFINITIONS

Workplace Violence

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

Domestic Violence

A situation where a person who has a personal relationship with a worker – such as a spouse or former spouse, current or former intimate partner or a family member may physically harm or attempt or threaten to physically harm that worker at work.

PROCEDURE

This policy provides the framework for the development of procedures and programs regarding the prevention of workplace violence. To this end, the following process will be conducted as part of our company workplace violence prevention program:

1) Risk Assessment

Senior Management will ensure a violence risk assessment is conducted (**Refer to Form 13-2-1-1 Workplace Violence Assessment**). Any risks identified through this process will result in the development and implementation of a specific violence prevention plan to address this risk. A review of the risk assessment and violence prevention plan will be conducted by Senior Management or designate (e.g. Project Manager) on an annual basis. These documents will also be reviewed and changes will be made, if the following situations take place:

- Change in nature of the workplace, type of work or work conditions*
- Workers or Health and Safety Representative indicate that procedures or programs in place to address workplace violence are inadequate
- Violent incident has occurred

Section 13-2-1 - Workplace Violence Prevention Program

Note: Nature of the workplace refers to the physical aspects of the workplace, including exits, entrances, lighting and objects that can be used as weapons. Type of work refers to the tasks workers perform and the workplace parties they interact with (e.g. clients, members of the public, etc.). Work conditions refer to work hours, working alone, the surrounding neighbourhood, etc.

As part of the violence risk assessment process, the following issues will be considered:

- Past occurrences of violence at that workplace
- Violence incidents that have occurred in similar workplaces
- Potential circumstances and interactions that occur in the course of performing work
- Geographic location and layout of the workplace
- Domestic Violence

A violence prevention plan will be developed that will include the following elements:

- A written Workplace Violence Prevention Policy Statement
- Strategies to minimize and, to the extent possible, eliminate the risk of violence in the workplace
- Training requirements regarding workplace violence for employees, Foreman, Superintendents and contractors
- Procedures for reporting, documenting and investigating incidents of violence

Note: If domestic violence is deemed to be a potential threat to a specific worker, senior management will undertake the appropriate measures to ensure the dissemination of relevant information to select/affected personnel. Company protocol regarding confidentiality of information will be followed.

2) Incident Reporting, Investigation and Follow-up

All workers are required to report any act or threatening statement of violence arising out of their employment, to their respective Foreman / Superintendent.

Senior Management will ensure that all violence incidents are investigated by the appropriate competent designated personnel. Any actions or incidents deemed to be of risk to worker health or well being will be dealt with following progressive disciplinary measures. In addition, local authorities will be summoned where required. This process will be documented and kept on file, and will be used in future risk assessments.

Section 13-2-1 - Workplace Violence Prevention Program

3) Training

General

All employee orientations and if necessary, during safety talks, the following items will be reviewed:

- Company Workplace Violence Prevention Policy
- Our expectations of conduct while engaging in work activities
- Violence prevention procedures, correct response procedures
- Workplace emergency procedures and incident reporting procedures

All subcontractors will be advised of our company policies regarding workplace violence prevention during site orientations and/or safety meetings.

Specific

Specific training regarding potential workplace violence will be provided to those employees or contractors who are required to work in “high risk” locations as identified through the violence risk assessment process.

Roles and Responsibilities

Senior Management

- Ensure that workplace violence prevention policy statement is prepared, and reviewed on an annual basis with all staff
- Ensure that a office and facility specific violence risk assessment is conducted and if necessary, a violence prevention plan is developed and implemented by the Health and Safety Coordinator.
- Ensure that the workplace violence prevention policy is communicated to all contractors at the workplace
- Ensure that appropriate training and education in violence prevention procedures and response procedures is provided to workers and/or contractor
- Report incident to the Ministry of Labour when required.

Project Manager

- Ensure the reporting, investigating and documenting of incidents of violence are established and are in place
- Conduct a site specific workplace violence assessment and if necessary, prepare a violence prevention plan
- Inform Workers, Foreman and Superintendents of the nature and extent of the risk of violence
- Report incident to Senior Management
- Take corrective actions and monitor their effectiveness
- Ensure regular evaluation of the workplace violence prevention program (annually, after an incident or if circumstances change)
- Ensure that the Health and Safety Coordinator is consulted as part of the violence risk assessment process and during the development of the Violence Prevention Plan

Section 13-2-1 - Workplace Violence Prevention Program

Superintendent Responsibility

- Report incident to police, Ministry of Labour, Project Manager.
- Comply with reporting, investigation and documenting procedures
- Facilitate ongoing discussion on workplace violence issues with workers and contractors, as required
- Provide input into violence risk assessment for construction sites
- Assist in development and updating of the violence prevention plan
- Review procedures for prevention of workplace violence
- Promote and encourage reporting of violent incidents.

Employee/Worker Responsibility

- Provide input into violence risk assessment
- Attend education and training sessions regarding violence
- Provide input into development of the violence prevention plan
- Follow established procedures for the prevention and reporting of incidents of violence
- Report incidents of violence to your immediate Foreman, Superintendent and/or Senior Management
- Provide input into incident investigations

Program Review

The violence program will be monitored and information from investigations, including feedback from workers, Foreman and Superintendents and Senior Management will be used to evaluate its effectiveness. Any weaknesses or opportunities for improvement that are identified through this process will be addressed. Evaluating the program on a regular basis is part of our company's commitment to ensuring a safety and healthy workplace.

FORM 13-2-1-1 - Workplace Violence Assessment/Control Measures

Company Name: _____ Name: _____

Workplace Location: _____ Date: _____

Describe responses to any of the following questions to indicate potential areas that need to be examined closely to address potential areas of workplace violence.

Is there a company history of incidents or threats of violence in the workplace? YES
 NO

Comments:

Is workplace near an area that has a historically high crime? YES
 NO

Comments:

Have any workers or the JHSC raised concerns respecting potential or actual violence in the workplace in the last 5 years? YES
 NO

Comments:

Are workers requested or required to work alone or in isolation within the workplace? YES
 NO

Comments:

Is there a need for workers to work during late evening or early morning hours by themselves? YES
 NO

Comments:

Do workers have contact with the public? YES
 NO

Comments:

Is access to the workplace controlled? (EX. at reception, coded cards, or keys) YES
 NO

Comments:

Is there a means of summoning immediate assistance in work areas should workplace violence occur? YES
 NO

Comments:

FORM 13-2-1-1 - Workplace Violence Assessment/Control Measures

Is there a means of summoning assistance within the workplace? (EX, paging system, emergency call button, phones) YES NO

Comments:

Is there security system in place and is it maintained? (EX. Security cameras, monitoring, guards, etc.)? YES NO

Comments:

Are there posted emergency response plan with floor plans showing exits, entrances, location of emergency equipment? YES NO

Comments:

Is the workplace designed in a manner that eliminates places to hide, enhances visual surveillance, and/ or lighting? YES NO

Comments:

Have the violence & harassment policies been posted within the workplace? YES NO

Comments:

Is there sufficient lighting inside and/or outside of the workplace? YES NO

Comments:

Are additional workplace locks used to secure working locations? YES NO

Comments:

Are locks used and are they fully functional? YES NO

Comments:

Section 13-2-2 - Workplace Harassment Prevention Program

PURPOSE

The purpose of the Workplace Harassment Prevention Policy and Program is to ensure that Senior Management, Project Managers, Superintendents, Foreman and Workers, as well as subcontractors, understand our Policy and their roles and responsibilities as they relate to harassment prevention in the workplace. In addition, to ensure that risks of harassment to employees are identified and eliminated or minimized through the implementation of prevention programs and/or practices.

DEFINITIONS

Workplace Harassment

Workplace harassment is defined to mean “engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome or sexual harassment”. The following examples as cited from the Canadian Human Rights Commission are what we consider to be different forms of harassment. It can include comments or actions related to race, national or ethnic origin, colour, religion, age, sex, marital status, family status, disability, pardoned conviction, or sexual orientation.

Sexual Harassment

Sexual harassment is defined in the Occupational Health and Safety Act as engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome. In addition, making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome. A reasonable action taken by an employer or relating to the management and direction of its workplace is not considered workplace harassment.

PROCEDURE

This policy provides the framework for the development of procedures and programs for the promotion of a respectful environment and a process for the prevention of workplace harassment. To this end, the following process will be conducted as part of our company Workplace Harassment Prevention Program:

1) Training

General

During employee orientations and safety talks the following items will be reviewed:

- Company Workplace Harassment Prevention Policy
- Our expectations of conduct while engaging in work activities
- Workplace Harassment prevention procedures and corrective response procedures

Section 13-2-2 - Workplace Harassment Prevention Program

All contractors will be advised of our company policies regarding Workplace Harassment Prevention during site orientations and/or safety meetings.

2) Incident Reporting, Investigation and Follow-up

Workers are required to report harassment arising out of their employment, to their respective Foreman, Superintendent, Senior Management or Health and Safety Coordinator.

Senior Management will ensure that all harassment incidents are investigated by the appropriate parties. Any actions or incidents deemed to be harassment will be dealt with following progressive disciplinary measures. This process will be documented and kept on file. In addition, local authorities will be summoned as required.

Results of the Investigation

Within 10 days of the investigation being completed (and in the absence of extenuating circumstances), the worker who allegedly experienced the workplace harassment and the alleged harasser, if he or she is a worker of the employer, will be informed in writing of the results of the investigation and any corrective action taken or that will be taken by the employer to address workplace harassment.

Confidentiality

Information about complaints and incidents shall be kept confidential to the extent possible. Information obtained about an incident or complaint of workplace harassment, including identifying information about any individuals involved, will not be disclosed unless disclosure is necessary to protect workers, to investigate the complaint or incident, to take corrective action or otherwise as required by law.

While the investigation is on-going, the worker who has allegedly experienced harassment, the alleged harasser(s) and any witnesses should not discuss the incident or complaint or the investigation with each other or other workers or witnesses unless necessary to obtain advice about their rights. The investigator may discuss the investigation and disclose the incident or complaint-related information only as necessary to conduct the investigation.

All records of the investigation will be kept confidential.

ROLES AND RESPONSIBILITIES

Health and Safety Coordinator Responsibilities

- Ensure the reporting, investigating and documenting of incidents of workplace harassment are established and are in place.
- Take corrective actions and monitor their effectiveness
- Ensure regular evaluation of the Workplace Harassment Prevention Policy (annually, after an incident or if circumstances change)
- Ensure appropriate training and education in harassment prevention procedures and response procedures is provided to workers and/or contractors

Section 13-2-2 - Workplace Harassment Prevention Program

Senior Management Responsibilities

- Ensure that the Workplace Harassment Prevention Policy Statement is prepared and reviewed on an annual basis with all staff

Project Manager Responsibilities

- Ensure that the Workplace Harassment Prevention Policy is communicated to all contractors
- Inform Workers, Foreman and Superintendents of the nature and extent of workplace harassment
- Ensure that the worksite Superintendent is consulted during the development of the Workplace Harassment Prevention Policy

Superintendent/Foreman Responsibilities

- Facilitate ongoing discussion on workplace harassment issues with workers and contractors
- Provide input into the workplace harassment policy
- Review procedures for prevention of workplace harassment
- Promote and encourage reporting of incidents of harassment
- Comply with reporting, investigation and documenting procedures

Worker Responsibilities

- Provide input into workplace harassment policy
- Attend education and training sessions regarding workplace harassment
- Follow established procedures for the prevention and reporting of incidents of workplace harassment
- Report incidents of harassment to your immediate Foreman, Superintendent and / or Senior Management
- Provide input into harassment investigations

PROGRAM REVIEW

The harassment program will be monitored and information from investigations, feedback from Workers, Foreman, Superintendents and Senior Management will be used to evaluate its effectiveness. Any weaknesses or opportunities for improvement that are identified through this process will be addressed. Evaluating the program on a regular basis is part of our company's commitment to ensuring a safety and healthy workplace.

Section 13-3 - First Aid

PURPOSE

Through prompt treatment by First-Aid Trained personnel, pain and suffering endured by injured workers may be minimized and where required, injured workers will be provided appropriate and timely care.

SCOPE

Provisions for first-aid are a legislative requirement under Regulation 1101 and the Workplace Safety Insurance Act (WSIA).

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Ensure adequate and appropriate first aid stations in the workplace are available.
- Ensure that trained first aid responders are readily available during working hours for the number of workers within the workplace.
- Comply with all the requirements as defined under the WSIA Regulation 1101, Occupational Health and Safety Act and Regulations.
- Assist in developing corporate health and safety documentation, policies and procedures where required.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported

Senior Management Responsibilities:

- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- The measures and procedures prescribed are carried out in the workplace.

Project Manager Responsibilities:

- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Coordinate with Foreman that adequate first aid stations and supplies are available in the workplace.
- Ensure that competent first aid responders are readily available during working hours for the number of workers within the workplace.
- Ensure there is an effective means of communication between first aid attendants, the workers and a means to summon outside assistance.
- Ensure first aid kits are supplied to each site and inspected for appropriate contents as required.
- Assist in the follow-up on the correction of each unsafe condition.

Section 13-3 - First Aid

- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Maintain a first aid station in the workplace.
- Ensure records of the first aid treatment/advice given to the worker are recorded on the First Aid Log.
- Apply First Aid if trained to do so.
- Ensure, where reasonably possible, that every Subcontractor, worker and visitor at the workplace complies with all Occupational Health and Safety Act and Regulations.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of.
- Take every precaution reasonable in the circumstances for the protection of a worker.

Workers Responsibilities:

- Seek first aid right away from a trained first aid responder if needed.
- Ensure accurate record of first aid treatment is recorded on the First Aid Log.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any injuries or contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

PROCEDURE

Annually, the health and safety legislative requirements for First-Aid – WSIA Regulation 1101 – will be reviewed and it will be determined if compliance is met within the company.

The company will ensure a first aid trained employee is available on all shifts, and ensure that first aid certified employees maintain a current first aid certificate. First Aid certification shall include First Aid, CPR and AED training. The certificates of the first aid trained employees will be posted at Health and Safety board. First Aid providers shall renew their certifications prior to expiry, the Health and Safety Coordinator will maintain and re-certify the first aid personnel based on the Training Matrix.

The requirements for first-aid kits will be determined for the office, and site personnel. When and where necessary first-aid kits will include Automated External Defibrillators (AED). Annually all 16-200 First Aid Kits shall be inspected by the Health & Safety Coordinator. Health & Safety Coordinator shall keep a inventory of AED units and follow manufactures requirements for the inspection and maintenance of all AED units. AED units will be inspected at minimum annually.

All first aid Kits will be equipped with a First Aid Kit Inspection Checklist **(13-3-2 - Form)**, a First-Aid Manual and a First-Aid Log **(13-3-1- Form)**.

Section 13-3 - First Aid

Each First Aid Kit Inspection shall be inspected by the **Superintendent** and/or **Foreman** using Checklist **(13-3-2- Form)** on a Quarterly basis.

All workplace parties will be instructed to report injuries immediately and seek the assistance of a First-Aid Trained person when they are injured in the workplace. The First-Aiders will document the treatment provided on the First-Aid Log **(13-3-1 - Form)**.

DISTRIBUTION

The following First-Aid documents will be available near and/or in the First Aid Kits or Health and Safety Boards within the workplace as required;

- Certificates of First-Aid Trained Personnel
- Regulation 1101,
- Form 82,
- First Aid Kit Inspection Checklist,
- First Aid Log
- Emergency Phone Numbers & directions to the nearest clinic and hospital

RECORDS

Regulation 1101 of the WSIA requires a Log of First Aid Injuries be maintained each time an injured worker receives First-Aid. First-Aid kits will be equipped with Injury Log sheets and First-Aiders will be required to complete the log entries each time they administer First-Aid.

All first aid treatment logbooks will contain the following information:

- Date of the injury
- Time of injury
- Names and work locations of witnesses
- Exact location of the treatment given



13-3-1 Form - First Aid Treatment Log

Name	Date	Time	Accident Description	Witness	Description of Injury (Nature + Body Part)	Supplies Used	Time of First Aid
John Doe	July 11, 2016	3:20 am <u>pm</u>	Cut finger on sharp edge of a wooden form.	Jane Doe	Cut on Left Index Finger	1 Roller Bandage	3:22 am <u>pm</u>
		am pm					am pm
		am pm					am pm
		am pm					am pm
		am pm					am pm
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Form 13-3-1 - First Aid Treatment Log

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Items	16-200 Workers
* Inspection Card for First Aid Kit	✓
** Manual	✓
*** First Aid Log Book	✓
Safety Pins	24
Basin	1
Individually Wrapped Adhesive Dressings	48
Adhesive Tape, 1 Inch wide	2 Rolls
1-Inch Gauze Bandage	12 Rolls
Sterile Gauze Pads, 3 Inches Square	48
Gauze Bandage, 2 Inches Wide	8 Rolls
Gauze Bandage, 4 Inches	8 Rolls
Sterile surgical pads, individually wrapped	6
Triangular Bandage	12
Splint Padding	2 Rolls
Splint(s)	Assorted Sizes
Stretcher	1
Blanket	2
Non-Latex Gloves in varying sizes	✓
CPR Mask (barrier device)	✓

Note: Medications and ointments should not be in first aid kits. Equipment outside of the scope of first aiders should not be in first aid kits.



- * Inspection Card (date and signature for quarterly inspections)
- ** Current edition of standard St. John Ambulance First Aid Manual
- *** First Aid Log Book: In the case of an accident, record (at minimum):
 - Circumstances of the accident described by the injured worker
 - Date and time of the accident
 - Names of witnesses
 - Nature and exact location of the injuries to the worker
 - Date, time and nature of each first aid treatment given

Date:

Initial:

Notes:

**(Inspect the First Aid Kit every 3 Months. Date and sign the form.
If the seal is broken, the First Aid Kit needs to be restocked.)**

Section 13-4 - Workplace Hazardous Materials Information System (WHMIS)

PURPOSE

We are committed to the protection of our employees from the harmful effects of hazardous workplace material. We must ensure that an appropriate, established and maintained Workplace Hazardous Materials Information System (WHMIS) is in place at all company locations. In addition, our Subcontractors must ensure a WHMIS Program is maintained and available on site.

SCOPE

Once a hazardous material has entered the workplace, the WHMIS Program will control exposure to these materials through a combination of assessments, training, labeling, Safety Data Sheets (SDS) and maintenance of the Program.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Review on a regular basis or at least annually, the information and training regarding chemicals, controlled and hazardous materials, instruction and training provided to the employees.
- Ensure all required SDSs are provided and documented from the manufacturer of the hazardous products.
- Establish methods to ensure the responsibilities in the purchase, storage, handling and dispose of WHMIS-controlled products.
- Ensure that training courses are of a duration that permits all training objectives / topics to be adequately covered.
- Ensure all company employees receive the appropriate training and workplace specific overviews.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Assist in developing corporate health and safety documentation, policies and procedures where required.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.

Senior Management Responsibilities:

- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- The measures and procedures prescribed are carried out in the workplace;

Section 13-4 - Workplace Hazardous Materials Information System (WHMIS)

Project Manager Responsibilities:

- Ensure that all hazardous chemicals, controlled products and waste materials stored, transported or disposed of by company personnel, are identified and labeled in accordance with applicable legislation.
- Ensure that the SDS binder are available to the employees and are current.
- Assist Supervisor and the Health and Safety Coordinator in scheduling the employee training and courses.
- Ensure all employees who may use workplace chemical, controlled products or handling hazardous waste materials have been trained in hazard recognition, safe handling, storage, transportation, and / or disposal procedures as may be required.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Make readily available to employees exposed information regarding hazardous materials by providing Safety Data Sheet (SDS) for all work locations where chemicals, controlled products and / or hazardous waste materials are handled, stored or transported.
- Ensure that all hazardous chemicals, controlled products and waste materials stored, transported or disposed of by company personnel, are identified and labeled in accordance with applicable legislation.
- Ensure that the SDS binder are available to the employees and are current.
- Ensure that all hazardous chemicals, controlled products and waste materials stored, transported or disposed of by company personnel, are identified and labeled in accordance with applicable legislation
- Take every precaution reasonable in the circumstances for the protection of a worker.

Foreman Responsibilities:

- Advise employees of the location of SDSs for WHMIS chemical materials and controlled products.
- Advise employees (who may be exposed to WHMIS chemical materials and / or controlled products) of the hazards associated with the products used in their workplace.
- Ensure that the SDS binder is available to the employees and are current. SDSs are prepared by the manufacturer of the controlled product.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations;
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of.
- Ensure that all hazardous chemicals, controlled products and waste materials stored, transported or disposed of by company personnel, are identified and labeled in accordance with applicable legislation
- Take every precaution reasonable in the circumstances for the protection of a worker.

Section 13-4 - Workplace Hazardous Materials Information System (WHMIS)

Workers Responsibilities:

- Attend and participate in education and WHMIS training programs on chemical materials and / or controlled products as required.
- Use WHMIS-related information and training to protect health and safety on the job, by taking all necessary steps to protect themselves and their co-workers.
- Bring to the attention of their supervisory any concerns about controlled products (e.g. damaged labels, outdated SDSs, defective personal protective equipment (PPE), health and safety concerns associated with controlled product use).
- Advise Supervisor if experiencing any difficulties with assigned tasks, or if assigned tasks are beyond perceived limitations or medically not capable of performing tasks.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Supervisor any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

PROCEDURE

The Workplace Hazardous Material Information System will be developed/ maintained by the **Health and Safety Coordinator** with the assistance of the **Superintendent** and **Foreman** where required.

The program will include the following topics:

- Part 1: Training
- Part 2: Safety Data Sheets
- Part 3: Labeling

DISTRIBUTION

Prior to training, the requirements for each of the Program elements will be distributed and reviewed with:

- Supervisors
- Health and Safety Coordinator

All workers and Subcontractor's workers will be able to review this program at any time.

RECORDS

All training of employees will be documented and retained on file by the **Health and Safety Coordinator** for a period of five years.

Section 13-4 - Workplace Hazardous Materials Information System (WHMIS)

Part 1: TRAINING OF EMPLOYEES

This segment of the Workplace Hazardous Material Information System will include the following topics to be considered when determining employee training:

1. Legislative Requirements
2. Target Groups
3. Company Specific Training
 - Training Considerations
 - Generic Training
 - Specific Training

1. LEGISLATIVE REQUIREMENTS

Gazzola Paving Limited will arrange for the delivery of generic and job specific training for all employees. Worker training must be designed to provide the knowledge needed to exercise the workers' "Right to Know" about the hazardous materials handled, stored or used in the workplace.

The means for delivery of the training must be planned and delivered in consultation with the Joint Health and Safety Committee (if applicable).

Updates and Reviews

The effectiveness of the WHMIS Program is to be assessed annually. The following will be a guideline to use when developing strategies for the training of employees.

2. TARGET GROUPS

Develop a "Needs Analysis", considering the following:

1. Toxicity of chemical agents used by workers,
2. Likelihood of exposure to physical or chemical agents (work with or in proximity)
3. Common exposure to physical or chemical agents
4. Learning abilities (e.g. language barriers)

Define the target groups, based on the considerations listed above. These target groups will be submitted to the **Health and Safety Coordinator**.

3. COMPANY SPECIFIC TRAINING

Training Considerations

Determine the training requirements for each group to be trained and ensure that the training is performance oriented.

Section 13-4 - Workplace Hazardous Materials Information System (WHMIS)

Generic Training

All training sessions as a minimum will cover the following:

- WHMIS Legislation
- Worker Education
- Labels
- Safety Data Sheets
- Emergency Procedures

Specific Training

The specific training needs will include the review of the chemical's hazardous properties and recent results from workplace health and safety monitoring and health and safety inspection findings.

The training must include a review of Safety Data Sheets in use by the target groups and participants should gain an understanding of how to protect themselves and their co-workers when handling, storing or using potentially hazardous products as well as steps to be taken in the event of an emergency.

A review should also be made on the administrative controls, engineering controls in place and/or the Personal Protective Equipment to be used. If Personal Protective Equipment is to be used, the trainer must explain the limitations, fit, use and care of the equipment.

Training Schedule

A training schedule will be arranged by the **Health and Safety Coordinator**.

WHMIS Training must be conducted initially for all employees and reviewed at least annually. WHMIS training shall be done annually using the electronic training platform and will include a knowledge test.

Section 13-4 - Workplace Hazardous Materials Information System (WHMIS)

Part 2: SAFETY DATA SHEETS

PURPOSE

Safety Data Sheets (SDS) are provided by the manufacturers/ suppliers of controlled products, which are used in the workplace. SDS will be available for review by all of our workers and Subcontractor's workers.

Safety Data Sheets are designed to provide the user with valuable health and safety information on the product that is being stored, handled or used. The worker's ability to use this information will be instrumental in the safe use of the product. SDS also provide valuable information on first-aid measures to be taken if a worker is adversely affected by a hazardous product.

PROCEDURE

The **Health and Safety Coordinator, Superintendents** and/or **Foreman** will determine procedures for obtaining the SDS from suppliers as well as Subcontractors and reviewing the content of the SDS and ensuring that appropriate control measures have been taken for the safe use, storage and handling of the product. The requirements for Safety Data Sheets will address the following topics:

- Legislative requirements
- Review of contents
- Ensuring adequate control measures for the product
- Training workers on use of SDS
- Maintaining current SDS
- Yearly review of SDS
- Location of SDS

DISTRIBUTION

SDS are maintained and available via the online database, which can be accessed by scanning the SDS QR-code and **Foremen / Superintendents** have access on their phones or if available tablets.



Gazzola Paving

Scan to access an
MSDS

All master list of SDS will be maintained in the WHMIS binders including the QR code for access to the listed SDS's.

RECORDS

The records to be maintained for the SDS's include any correspondence to suppliers, requesting SDS, etc.

Section 13-4 - Workplace Hazardous Materials Information System (WHMIS)

Part 3: LABELING

PURPOSE

WHMIS legislation clearly defines the labeling requirements for controlled products brought into and used in the workplace. Labeling of controlled products is done in one of two manners, through Supplier Labels and/ or Workplace Labels.

PROCEDURE

The **Health and Safety Coordinator** will define the labeling requirements for all controlled products in the workplace. The labeling requirements must make provisions for the following;

- Requirements for Supplier Labels
- Requirements for Workplace Labels
- Receiving Hazardous / Controlled Products

Supplier Labels - must be provided and/or affixed to containers of controlled products by the supplier / manufacturer. These labels provide valuable health and safety information to the people handling/ storing or using the product and they also alert the user that the product is considered a potentially hazardous product.

Affixed supplier labeling for controlled products in approved storage containers or transferred controlled products into other containers in the workplace must be adequately identified through the use of labels and communicated to workers. It is very important for our employees to be aware of and understand applicable labeling requirements for these types of controlled products.

Workplace Labels - when controlled products are decanted from their original / primary containers into new / secondary containers, Workplace Labels must be affixed to or written onto these new containers.

DISTRIBUTION

The specific requirements for labeling will be reviewed during the training sessions with all employees.

RECORDS

Labeling requirements will be maintained in the WHMIS Binders.

Section 13-5 - Return to Work (RTW)

PURPOSE

The Return to Work (RTW) Program will facilitate a safe and early return to work for Workers who have sustained a workplace injury while employed with our company.

SCOPE

The RTW program will provide every opportunity for injured Workers to return to gainful employment in the event of a disabling workplace accident.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Develop / offering suitable Modified Work.
- Communicate with the WSIB relating to the RTW process and existing claims.
- Maintain all documentation related to the injury, WSIB, modified work, and recovery progress.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Assist in developing corporate health and safety documentation, policies and procedures where required.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.

Senior Management Responsibilities:

- Cooperate with the RTW program and worker restrictions as required.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- The measures and procedures prescribed are carried out in the workplace.

Project Manager Responsibilities:

- Arrange for suitable Modified Work.
- Assist Superintendent and the Health and Safety Coordinator in developing / offering suitable Modified Work.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Follow-up on the findings and implement recommendations for each unsafe condition.
- Assist Project Manager and the Health and Safety Coordinator in developing / offering suitable Modified Work.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.

Section 13-5 - Return to Work (RTW)

- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of.

Workers Responsibilities:

- Participate in the RTW Program diligently.
- Obtain Functional Abilities information at each Health Care Practitioner's visit related to the work-related injury.
- Provide all RTW documentation provided by the Health Care Practitioner to you Foreman or Superintendent.
- Advise Foreman if experiencing any difficulties with assigned tasks, or if assigned tasks are beyond perceived limitations or medically not capable of performing tasks.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

PROCEDURE

Once an injured Worker has been placed on an RTW program, the **Superintendent** for that Worker, with assistance from the **Health and Safety Coordinator**, will be expected to follow the program with the injured worker by documenting temporary modified work / worker's progress report and keep **Senior Management** updated as required.

The RTW program will be broken into two stages;

1. To prevent Workers from losing time due to workplace injuries through prompt medical treatment (use of the WSIB Functional Abilities Form) and adherence to the Workplace Safety and Insurance Act (WSIA).
2. To return Workers to gainful employment as soon as medically authorized. This will be done on potentially two levels;
 - a) Temporary Modified Work
 - b) Permanently Modified Work

DISTRIBUTION

The entire workforce must also be made aware of the RTW program during worker Orientations and/or review of the Red Book.

RECORDS

Worker records generated through the RTW program must be maintained indefinitely.

Section 13-5 - Return to Work (RTW)

Return to Work (RTW) Program

The purpose of having an RTW program is to provide workers who have been injured on the job, a safe means for returning to gainful employment in an expedient manner while ensuring that "Lost Time" is kept to an absolute minimum.

Re-employment obligations and the financial impact of experience rating implemented by the Workplace Safety and Insurance Board have put the onus on the Employer to return injured Workers to the workplace as soon as possible. As per the Workplace Safety and Insurance Act, 1997, s. 40 (See below). All employers are required to have a Return to Work program.

PART V RETURN TO WORK

Duty to co-operate in return to work

40. (1) The employer of an injured worker shall co-operate in the early and safe return to work of the worker by,

- (a) contacting the worker as soon as possible after the injury occurs and maintaining communication throughout the period of the worker's recovery and impairment;
- (b) attempting to provide suitable employment that is available and consistent with the worker's functional abilities and that, when possible, restores the worker's pre-injury earnings;
- (c) giving the Board such information as the Board may request concerning the worker's return to work; and
- (d) doing such other things as may be prescribed. 1997, c. 16, Sched. A, s. 40 (1).

Same, worker

(2) The worker shall co-operate in his or her early and safe return to work by,

- (a) contacting his or her employer as soon as possible after the injury occurs and maintaining communication throughout the period of the worker's recovery and impairment;
- (b) assisting the employer, as may be required or requested, to identify suitable employment that is available and consistent with the worker's functional abilities and that, when possible, restores his or her pre-injury earnings;
- (c) giving the Board such information as the Board may request concerning the worker's return to work; and
- (d) doing such other things as may be prescribed. 1997, c. 16, Sched. A, s. 40 (2).

Same, construction industry

(3) Employers engaged primarily in construction and workers who perform construction work shall co-operate in a worker's early and safe return to work and shall do so in accordance with such requirements as may be prescribed. Subsections (1) and (2) do not apply with respect to those employers and workers. 1997, c. 16, Sched. A, s. 40 (3).

Section 13-5 - Return to Work (RTW)

1.0 PURPOSE/ INTRODUCTION

Return to Work Programs became mandatory effective January 1, 1998 as a result of Bill 99. Employers and their workers are required to work cooperatively and communicate in the facilitation of the worker's return to work. The failure of any workplace party (employers or workers) to comply with these initiatives could result in penalties by the Board, as a provincial offence, under the WSIA.

The focus of an effective Return to Work Program (RTW) is the well being of our most valuable resource, our workers. This program is a temporary measure (in some extreme cases - permanent) that will facilitate a safe and early return to work in the event of a disabling workplace accident and provide every opportunity for injured workers to return to gainful employment.

This Program can only be successful if there is commitment, cooperation and communication between the employer and workers and as necessary the treating physician, health care providers and the WSIB.

Return to Work Goal Setting:

The primary goal of a return to work plan is a return to the pre-injury job as soon as possible. By comparing the physical demands of the job and the functional abilities, the Health and Safety coordinator, supervisor and the employee can determine if the job needs modifying and if accommodations would be required.

If the employee is not able to return to their pre-injury position, the Health and Safety coordinator and supervisor will attempt to accommodate the worker as soon as possible. The accommodation should be suitable and restore the employee's earnings. The employer will make every effort to provide meaningful modified work. The Health and Safety coordinator and supervisor will use the following hierarchy as a guideline to return to work plan development:

1. Pre-injury job (starting point and overall goal)
2. Pre-injury job, accommodate to meet the workers abilities.
3. Work comparable in nature and earnings to the pre-injury job (with accommodation if required)
4. Alternate suitable work (with accommodation if required)

2.0 REPORTING REQUIREMENTS TO WSIB

Under Section 21(1) of the WSIA, an employer shall notify the Board within three days after learning of an accident to a worker employed by him/ her or if the accident necessitates health care or results in the worker not being able to earn full wages. As well, an employer shall give a copy of the Form '7' to the worker at the time the notice is given to the WSIB. Equally, the worker shall give a copy of his or her claim to his or her employer at the time the claim is given to the Board.

Under Section 21(3) of the WSIA an employer who fails to comply with this section shall pay the prescribed amount to the Board under Act. Under Section 157, if a corporation commits an offence under this Act, every director or officer of the corporation who knowingly authorized, permitted or acquiesced in the commission of the offence is guilty of an offence, whether or not the corporation has been prosecuted or convicted.

Section 13-5 - Return to Work (RTW)

Wage Changes – Under the WSIA a change in a worker's wage or condition constitutes a material change that affects a person's entitlement to benefits and services under the Act. Any change in wages must be reported to the WSIB within 10 days of the change.

Changes in Modified Work Duties/ Duration of Program

As is necessary, the modified work duties as performed by the worker shall be monitored or adjusted, to ensure progress or difficulties being encountered by the worker are being addressed.

All change in duties must be documented on the worker contact log and medically authorized by the treating physician. As well, all change in duties should be reviewed and approved by the JHSC/ Modified Work Committee and explained to the worker, the Supervisor and others involved in the RTW Program.

Failure to Cooperate

If the WSIB determines that an employer is not co-operating in RTW activities, the employer will be notified by the WSIB regarding their obligation to co-operate in RTW activities and finding of non-co-operation.

If the WSIB determines that a worker is not co-operating in RTW activities, the decision-maker notifies the worker of the obligation to co-operate in RTW activities, and consequences of this finding (i.e., reduction or suspension of benefits).

Return to Regular Pre-Accident Work Duties/ End of RTW Program

All injured workers should obtain medical clearance from their treating physician, via a Functional Abilities Form or note from the treating physician, prior to resuming his or her pre-accident duties. The WSIB must also be advised of this change.

3.0 ROLES AND RESPONSIBILITIES

Assigning ownership in any Return to Work Program is vital in achieving desired results. As such, identifying and understanding each party's role and responsibility is the first key.

The role of the Health and Safety Coordinator is to ensure regular communication exists between Worker, Project Manager and the Health Care Provider. Under the return to work obligations Part V Section 40, (Subsection 1) of WSIA the employer of the injured worker shall cooperate in the return to work program by:

- contacting the worker as soon as possible after the injury occurs and document ongoing communication using the workers contact log throughout the period of the worker's impairment and recovery,
- providing suitable employment that is available and consistent with the worker's functional abilities and that, when possible, restores the worker's pre-injury earnings,
- giving the Board such information as the Board may request concerning the worker's return to work and doing such things as may be prescribed.

Section 13-5 - Return to Work (RTW)

Independent medical assessments: Where there are discrepancies or differences in opinions around the employee's prognosis or functional abilities, the employer may request that an independent medical assessment be completed in an attempt to resolve the issue.

The role of the Injured Worker when filing a claim, a worker must consent to the disclosure to his or her employer of information provided by a health professional under subsection 37(3) concerning the worker's functional abilities. The disclosure is for the sole purpose of facilitating the worker's return to work.

Under the return to work obligations Part V Section 40, (Subsection 2) of the WSIA the worker shall cooperate in his or her return to work by:

- contacting his or her employer as soon as possible after the injury occurs and maintain communication throughout the period of the worker's impairment and recovery,
- assisting the employer, as may be required or requested, to identify suitable employment that is available and consistent with the worker's functional abilities and that, when possible restores his or her pre-injury earnings,
- giving the Board such information as the Board may request concerning the workers return to work; and
- doing such things as may be prescribed.

The role of the Health Care Provider is to provide medical treatment to an injured worker. The health care provider shall complete a Form 8 during the initial visit and provide the completed third page of the Form 8 to the worker. This third page represents the functional abilities information found during the assessment. Every subsequent visit, the physician will complete a functional Abilities Form provided by the injury party.

The role of the WSIB is to monitor the progress of the workers return to work and provide assistance if either the employer or the workers have any difficulty or dispute concerning either parties' cooperation with the RTW. Under Section 40(6) of the WSIA, either party could contact the WSIB for assistance. This includes the assistance of a WSIB assigned Return to Work Mediator who will assist both workplace parties in resolving any or all disputes that need to be addressed.

4.0 SUPERVISOR'S DUTIES

Experience dictates that the supervisors play an integral role from the time of the accident to the injured worker's return to work. As such, the following guidelines are to clarify the supervisor's roles and responsibilities. To ensure that accidents are properly documented and minimize the need for lost time assist, an injury management package was created for all supervisors that provides the necessary paperwork to be completed.

Injury Management Package Includes:

- Attending to An Injured Employee
- Letter to the Health Care Provider
- Form 8
- Functional Abilities Form
- Accident Investigation Form
- Letter to the Employee Offering Modified Job Duties
- Worker's Return to Work Progress Report

Section 13-5 - Return to Work (RTW)

1. Provide prompt medical treatment by arranging transportation for the injured worker and accompany or assign someone to take the worker to a medical treatment facility. In cases of serious accidents, where the possible improper movement (transportation) of an injured worker could result in further injuries or unnecessary pain to the injured worker, an ambulance must be called (911).
2. Should the injured worker choose to be seen by his/ her family doctor, the injured worker must be given an Injury Management Package to be completed and returned before the following shift. Explain that your company has developed and implemented an Return to Work Program that requires all party's co-operation.
3. Should the employee not choose to attend the nearest medical walk in clinic on the day of accident or reporting and does not return page 3 of Form 8 or Functional Abilities Form prior to the next shift, the employee should be asked to cooperate and attend a walk-in clinic, arranged by the company, to have the Form 8 or Functional Abilities Form completed and returned to the Supervisor.
4. Assign suitable modified duties, if medically required, in accordance with the physical restrictions noted on the Form 8 third page or Functional Abilities Form.

Maintain regular contact with the program coordinator and injured worker to ensure progress and deal with difficulties encountered by the worker to avoid a recurrence.

5. Investigate the accident and provide a completed copy to the program coordinator to ensure all WSIB reporting requirements are met.

5.0 Contact with the Injured Worker

Under Section 40(1) of the WSIA, the employer of an injured worker shall co-operate in the return to work of the worker by,

40(1) (a) Contacting the worker as soon as possible after the injury occurs and maintaining communication throughout the period of the worker's recovery and impairment;

40(2) (a) The worker shall co-operate in his or her return to work by, contacting his or her employer as soon as possible after the injury occurs and maintaining communication throughout the period of the worker's recovery and impairment;

To ensure contact is established and maintained by the program coordinator. After the contact, a record of worker's contact regarding the injured worker will be maintained.

In the event that a problem cannot be resolved between the Supervisor, injured worker and the program coordinator, a meeting should be arranged between the parties for resolve. If the dispute cannot be resolved this matter can be taken up with the WSIB for dispute resolution.

Establishing Early Contact: If an employee is off due to an injury or illness, it is recommended (where appropriate depending on the severity or circumstances of the injured/ill employer) that contact be initiated by the supervisor and or the Health & Safety Coordinator within 24 to 48 hours. Contact can be a telephone call or a face to face meeting.

Section 13-5 - Return to Work (RTW)

Frequency of Contact: The frequency of contact required by the employee and Health and Safety coordinator will be determined by the health recovery status. At minimum, a follow up case conference between the worker and Health and Safety coordinator by telephone at least biweekly.

Health Recovery: The Health and Safety coordinator will assist and support the injured employee during their recovery. The process will involve consultation with the treating health professional and the employee. The Health and Safety coordinator will obtain functional abilities to be utilized when developing the return to work plan.

6.0 Medical Monitoring and Treatment

Regular review of the workers physical abilities will provide an employer with the opportunity to accommodate an injured worker and facilitate the goal of returning a worker to his or her pre-injury duties as soon as possible.

To assist in the medical monitoring and treatment, a worker should be given a Functional Abilities Form to have completed and returned to the employer on the day of the workers scheduled medical appointment.

Note: Section 22(5) of the WSIA, when filing a claim, a worker must consent to the disclosure to his/her employer information provided by a health professional concerning the worker's functional abilities for the purpose of facilitating the worker's return to work.

Dispute resolution process: In situations where there is an issue in dispute related to either the RTW process or the suitability of the RTW plan, and where a meeting with the worker did not resolve the dispute, the RTW Coordinator will refer the matter to Management to facilitate a resolution. All findings and discussions will be recorded. If the matter cannot be resolved, a referral to the WSIB may be made where the dispute involves cooperation in return to work or suitability of the job accommodation. The WSIB may then requisition a Return to Work Specialist to meet with all parties to assist in a resolution.

7.0 Provisions for Modified Work

Safe Duties - It is essential that an employer impress upon an injured employee that he/ she is a valuable employee and the Return to Work Program is not intended to cause further injury. Before returning an injured or ill employee to any form of work duty it is important to have pre-determined levels of accommodated Modified Duties for the injured worker to perform. (Example Modified Field Level Duties for less serious injuries where a worker can still perform some work on site and Sedentary Duties for more serious injuries, describing duties that can be performed in a shop/ office environment)

Other Available Work - The enclosed Suitable Modified Work Job Description or Physical Demands Analysis is designed to assist an employer in assembling/ documenting the duties of the modified positions to provide to the worker's treating physician for approval. In the case of a permanent impairment, the members of the JHSC will meet with the injured worker, and others, to consider what additional measures might be necessary for placement in a suitable and sustained permanent position that could require further (re) training.

Section 13-5 - Return to Work (RTW)

Worker Progress Log - It is recommended that the supervisor make contact with the worker so that any difficulties can be communicated and readily resolved. The program coordinator should ensure that the worker is recording the Worker's Return to Work Progress and that it is being reviewed and signed by the supervisor, at the end of the first day back to work, and at the end of each week. These forms are to be completed at least until the worker is able to return to his/ her pre-accident job. After the injured worker has been integrated back into the workplace, the next stage is to ensure that the follow-up procedures are understood and followed.

8.0 Re-Integration of the Worker to Regular Work

Transitional Work - With injured workers who have been off for a substantial period of time due to a more serious injury, it is recommended to start them off working a transitional work program, usually starting work and gradually increased every week or every other week, as his/ her condition permits, until the injured worker is working pre-accident hours. It is felt that by implementing this gradual increase in hours, you are reducing the risk of re-injury or possibly a new injury. In addition, this return to work phase will assist the worker in re-adjusting (work hardening, acclimatizing) to working again, both physically and mentally. Supervisor together with the injured worker are encouraged to utilize whatever measures are most appropriate in the individual case.

Work Hardening – Through active rehabilitation treatment and work hardening, injured workers will be able to recover from their injuries in an expedient manner. Furthermore, rehabilitation treatment will help the injured worker understand the nature of the injury and methods of avoiding a recurrence (e.g. back injuries - proper lifting techniques). To ensure minimal disruption to the Return to Work Program, it is recommended that all physiotherapy and doctors appointments be arranged for the end of the workday or after work.

9.0 Monitoring and Evaluating the RTW program

Monitoring and Evaluating of our return to work program will be completed at the end of each year. The Health and Safety coordinator will complete the evaluation and present it to senior management for review. This review may also include feedback from individuals within the workplace that have gone through the RTW process. Following the review, Management will prepare an action plan and implement required changes.

The WSIB RTW Self Assessment tool will be used as the evaluation tool during the annual evaluation conducted by the Health & Safety Coordinator.

Section 13-6 – Traffic Management Plan

PURPOSE

The Traffic Management Plan must consider and address hazards with respect to access/egress to and from the project, vehicular movement on the project and pedestrian traffic.

SCOPE

Each project will be required to have a Traffic Management Plan designed to minimize potential hazards that may be created by vehicular traffic and/or mobile equipment.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Assist in developing Traffic Management Plan for all workplaces and sites other than where the constructor or owner has already developed a plan to be used.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.

Senior Management Responsibilities:

- Take all measures reasonably necessary in the circumstances to protect employees from exposure to Traffic related hazards at all locations.
- Review Occupational Health and Safety Act and Regulations to ensure compliance within the Traffic Management Plan.
- Ensure the Traffic Management Plan is implemented across all areas of responsibility.
- Ensure that the equipment, materials and protective devices as prescribed are provided, maintained in good condition and used as prescribed.

Project Manager Responsibilities:

- Assist in developing Traffic Management Plan for all workplaces and sites other than where the constructor or owner has already developed a plan to be used.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Assist in developing Traffic Management Plan for all workplaces and sites other than where the constructor or owner has already developed a plan to be used.
- Follow-up on the findings and implement recommendations for each unsafe condition.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Ensure that the Traffic Control Persons (TCP) shall be competent and not perform any other work while directing traffic.

Section 13-6 – Traffic Management Plan

Foreman Responsibilities:

- Ensure known Traffic Control related hazards are defined with a site specific plan and contained in the Traffic Management Plan.
- Brief all workers and Subcontractors on the Traffic Management Plan.
- Provide education and training to workers who are responsible for traffic control.
- Take prompt and appropriate action when contraventions with the Traffic Control Plan have been identified.
- Ensure that the Traffic Control Persons (TCP) shall be competent and not perform any other work while directing traffic.
- Appoint TCP to coordinate and direct traffic flow on site as per Traffic Management Plan.
- Ensure that TCP is positioned in such a way that he or she is endangered as little as possible by vehicle and construction traffic.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker

Workers Responsibilities:

- When performing traffic control duties do not undertake any other responsibilities.
- If required, participate in Traffic Control training.
- Report any traffic control violations immediately to your Foreman.
- Adhere to the requirements outlined in the Traffic Management Plan developed and implemented for the project.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

PROCEDURE

Prior to commencement of work on the project, The **Superintendent** with the assistance of the **Project Manager** will;

1. Review the project layout drawings provided the constructor or owner representatives.
2. Review local bylaws that govern public ways.
3. Determine when peak traffic periods exist in the vicinity of the project and how traffic that accesses or egresses the project will be affected.
4. Review the schedule and determine when peak vehicular/pedestrian traffic may occur - plan deliveries and/or other activities that may affect public ways accordingly.

Section 13-6 – Traffic Management Plan

Using a site map, ensure the following is define;

- Access / egress to and from the project
- Flow of traffic
- Parking of site vehicles (e.g. one side of the street)
- Delivery and off-loading areas
- Lay down areas
- Mobile equipment storage
- Emergency vehicle access
- Compound storage areas
- Restricted parking area

Develop a written site specific Traffic Management Plan that will be used in conjunction with a site map detailing all the specifics detailed above where the constructor, owner of site management has not already developed a plan to be used.

Notes:

1. Through a well defined Traffic Management Plan, the safe movement of vehicular traffic and mobile equipment can be achieved.
2. The plan must be designed with a view to eliminate reversing of vehicular traffic and mobile equipment.
3. The flow of traffic on the site must be designed to allow for emergency vehicles to have complete access to all areas of the project
4. Depending on the project location, local police may be required to conduct traffic control duties, or trained traffic control personnel may be required.

Review the plan on a regular basis to ensure that it meets the ever-changing construction environment.

Re-distribute and review with those affected

DISTRIBUTION

The Traffic Management Plan will be distributed as follows;

- To all Subcontractors and Suppliers during orientation meetings
- Reviewed with all workers
- Reviewed with Trained Traffic Control Personnel
- The **Superintendent, Foreman and Health and Safety Coordinator**

RECORDS

Documentation and other information must be maintained on file for the duration of the project. Upon completion of the project, all information related to the Traffic Management Plan must be submitted to Head Office with all post site documentation.

Section 13-7 – Confined Space Entry Procedure

PURPOSE

This Program provides an overview of a system to direct owners, constructors, employers, contractors, supervisors and workers involved in confined space entry work to work safely.

SCOPE

This confined space and safe work procedures, training and equipment must be employed to work in all potential confined space situations.

OVERVIEW

Entry to confined space includes many risks including restricted access/egress, atmospheric hazards, physical and biological hazards, process hazards, etc. In an effort to reduce and control these hazards, precautions are required to be implemented prior to and during confined space entry in accordance with Confined Space Regulation 632/05.

Definitions:

Atmospheric hazards:

- (a) the accumulation of flammable, combustible or explosive agents,
- (b) an oxygen content in the atmosphere that is less than 19.5 per cent or more than 23 per cent by volume, or
- (c) the accumulation of atmospheric contaminants, including gases, vapours, fumes, dusts or mists, that could,
 - (i) result in acute health effects that pose an immediate threat to life, or
 - (ii) interfere with a person's ability to escape unaided from a confined space

Confined Space:

A fully or partially enclosed space,

- (a) that is not both designed and constructed for continuous human occupancy, and
- (b) in which atmospheric hazards may occur because of its construction, location or contents or because of work that is done in it.

Attendant

An attendant is a competent person that is to be assigned and stationed outside and near the entrance of the confined space. The attendant is not allowed to enter the confined space under any circumstances. The attendant is required to be in communication with all workers in the confined space at all times (e.g. verbally, two-way radio, etc.). The attendant is required to monitor the safety of the worker, provide assistance or contact rescue personnel as required.

Section 13-7 – Confined Space Entry Procedure

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Develop confined space procedures and safe work procedures to define corporate expectations relating to Confined Space work.
- Schedule and coordinate Confined Space awareness training as required.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Assist in developing corporate health and safety orientation documentation, policies and procedures where required.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.

Senior Management Responsibilities:

- Ensure all company employees receive the appropriate training and workplace specific overviews.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Ensure that the equipment, materials and protective devices as prescribed are provided, maintained in good condition and used as prescribed.
- The measures and procedures prescribed are carried out in the workplace;

Project Manager Responsibilities:

- Ensure confined space and safe work procedures, training and equipment are procured as required.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Coordinate appropriate subcontractors to perform all Confined Space work as required.
- Review findings with each Foreman to ensure that corrective measures are taken.
- Follow-up on the findings and implement recommendations for each unsafe condition.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Section 13-7 – Confined Space Entry Procedure

Foreman Responsibilities:

- Ensure confined space and safe work procedures, training and equipment are procured as required.
- Ensure, where reasonably possible, that every Subcontractor, worker and visitor at the workplace complies with all Occupational Health and Safety Act and Regulations.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations;
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which the is aware of;
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker.

Workers Responsibilities:

- Advise Foreman if experiencing any difficulties with assigned tasks, or if assigned tasks are beyond perceived limitations or medically not capable of performing tasks.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations;
- Report to his or her Superintendent / Forman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device;

PROCEDURE

In general, entry into confined spaces shall be avoided whenever possible. Where possible, work will be conducted by alternate means from outside the space (work from outside the space, use an extender, possibly utilize a robot, etc.).

All potential confined spaces will be identified and assessed by a competent person/ worker who has adequate knowledge, training and experience to perform/ conduct this exercise.

A Confined Space Entry Permit (CSEP) (**13-7-1 Form**) shall be completed before (and during) each entry into a confined space. This will identify/ assess potential hazards, detail duties and responsibilities, identify competent entrants and outline the specific safe work procedures for the work that is to be completed.

STANDARD WORK PROCEDURE

Each Employer and/or Subcontractor who is associated with working in a Confined Space must submit a written copy of their confined space and rescue procedures prior to the commencement of work.

All health and safety hazards shall be eliminated or adequately controlled by engineering, administrative or other control measures before entry is made into a confined space.

Section 13-7 – Confined Space Entry Procedure

When the confined space entry work involves multiple employers and/ or contractors working in the area at the same time, the constructor is responsible for the preparation of the coordination document. Each employer participating in confined space entry will receive a copy of the coordination document.

The coordination document will ensure all workplace parties involved with confined space entry complete the required documentation and have implemented the appropriate control and training requirements.

In either situation, the Confined Space Entry Program and process will focus on:

- Performing a written site specific hazard assessment can be incorporated into the CSEP
- Ensuring all persons involved in the confined space entry are competent persons/ workers and documentation of these credentials are available
- Atmospheric assessment and monitoring equipment is available with appropriate calibration and bump test records available
- Continuous monitoring will be provided prior to entry and when any worker is in the confined space
- Providing a dedicated Confined Space Attendant who is competent, trained and present at the opening of the confined space
- Providing all appropriate Personal Protective Equipment, rescue gear and appropriate numbers of trained personnel to effect a rescue, with training records available
- Emergency response team which is readily available, trained, and with the appropriate equipment necessary for the situation
- Ensuring that there is a worker who is trained in First Aid and CPR readily available

In the event that all of these stipulations cannot be met, it is suggested that a third party Subcontractor, who is specifically trained and equipped in confined space entry and rescue procedures be retained. These third party contractors must have the necessary rescue equipment and trained in place with prepared rescuers to conduct and carry out their safe rescue procedures.

RESCUE PLANNING

A vast array of health and safety and rescue equipment is required to ensure safe entries into and rescues from a space deemed to be a Confined Space.

These items must be supplied and maintained by the employer and evaluated by a competent worker prior to each use to ensure that they are functioning properly. The extent of actual equipment required will depend on which hazards are present and the atmospheric and physical surroundings of the area to be entered.

This will be addressed on the Confined Space Entry Permit (CSEP) **(13-7-1 Form)** and under Confined Space Entry Control Plans and Confined Space Entry Permits.

Additional training must be provided to every worker who will be involved in Confined Space. This training will include generic and hazard specific training and hands-on usage of all required equipment. This will ensure that all workers who may be required to use the equipment will become proficient in its use and understanding of its function and limitations.

Section 13-7 – Confined Space Entry Procedure

COMMUNICATION

This program is to be communicated with all workers required to perform confined space entry or work involving a confined space.

LEGISLATION

The confined space legislation (Regulation 632/05) addressed in these guidelines denote minimum standards or requirements. As outlined in the site specific safe work procedures more stringent or rigorous measures may/ will have to be implemented.

Each individual entering a confined space should be competent - aware of all potential hazards, follow the prescribed safe work procedures - as addressed in the CSEP - and know the limitations of the equipment/ devices being used.

These guidelines have been worded to incorporate the intent and “best practice” principles from a variety of legislative requirements, codes, standards and work sectors in Ontario and across Canada.

Note: That provincial governed employers working on federal projects must determine which standards apply.

RECORDS

Records of; inventories (locations), assessments, coordination plans, equipment inspections, training records, and Confined Space Entry Permits shall be completed and kept on file for at least one year after confined space entry is completed.

These records may/ will be used as reference material for future entries into confined spaces or controlled access areas.

DISTRIBUTION

All owners, constructors, contractors, supervisors and workers working in or around confined space or controlled access areas shall receive copies of the agreed to safe work procedures and these are to be made available upon request to the Joint Health and Safety Committees and/ or Worker Representatives.

**You don't have to prove it is a confined space...
You have to prove it is not.**

Confined Space Entry Permit

Effective: ____ / ____ / ____

 From: ____ : ____ ^{am}/_{pm}

 To: ____ : ____ ^{am}/_{pm}

Location	Location of Confined Space:	Project Name:
	Employer Name:	Competent Person:
	Assessment Performed by:	Name of Permit Issuer:
	Description of Confined Space:	
	Description of Work to be Performed:	

Note: The permit shall comply with the relevant plan.

Air Monitor Name	Serial #	Last Calibration/Bump Test

Air Quality Results	Time of Test							
	Oxygen %							
	Combustibles %							
	Carbon monoxide (CO)							
	Hydrogen sulphide (H ₂ S)							
	Other atmospheric hazard ()							
Tester's Name (print):				Signature:				

Hazards & Controls	Atmospheric/Physical Hazards	Controls	Personal Protective Equipment
	<input type="checkbox"/> Flammable	<input type="checkbox"/> Purging	<input type="checkbox"/> Respirator
	<input type="checkbox"/> Toxic	<input type="checkbox"/> Mechanical ventilation	<input type="checkbox"/> Gloves
	<input type="checkbox"/> Corrosive	<input type="checkbox"/> Natural ventilation	<input type="checkbox"/> Boots
	<input type="checkbox"/> Oxygen deficient/enriched	<input type="checkbox"/> De-energize, lockout	<input type="checkbox"/> Eye protection
	<input type="checkbox"/> Hot temperatures	<input type="checkbox"/> Blank	<input type="checkbox"/> Head protection
	<input type="checkbox"/> Electrical	<input type="checkbox"/> Inerting	<input type="checkbox"/> Fall protection
	<input type="checkbox"/> Slippery surfaces	<input type="checkbox"/> Other:	<input type="checkbox"/> Other:
	<input type="checkbox"/> Lighting	<input type="checkbox"/> Other:	<input type="checkbox"/> Other:
	<input type="checkbox"/> Hot work	<input type="checkbox"/> Other:	<input type="checkbox"/> Other:
	<input type="checkbox"/> Working at heights	<input type="checkbox"/> Other:	<input type="checkbox"/> Other:
<input type="checkbox"/> Other	<input type="checkbox"/> Other:	<input type="checkbox"/> Other:	

Attendant Entry Log	Worker Name	Permit Reviewed with Workers	Time In	Time Out	Time In	Time Out	Time In	Time Out
		<input type="checkbox"/>						
		<input type="checkbox"/>						
		<input type="checkbox"/>						
		<input type="checkbox"/>						
	Attendant's Name (print):				Attendant's Signature:			

Rescue Equipment	<input type="checkbox"/> Winch <input type="checkbox"/> Respirator <input type="checkbox"/> Ladder <input type="checkbox"/> Tripod <input type="checkbox"/> Harness
	Other: _____ Other: _____ Other: _____ Other: _____
	Rescue equipment inspected and in good working order? <input type="checkbox"/> Yes <input type="checkbox"/> No

Confirmation of Work Completion	Signature	Date	Time

Section 13-8 – Radiation Protection

PURPOSE

This Program provides an overview of a system to control the handling, transporting, storage and operation of nuclear radiation portable gauges. The program has been developed to ensure compliance with the Nuclear Safety and Control Act (NSCA), the requirements and guidelines provided by the Canadian Nuclear Safety Commission (CNSC).

SCOPE

This program applies to all Gazzola Paving Ltd's personnel involved in the handling, transporting, storage and operation of nuclear radiation portable gauges. The program also extends to include emergency situations and measures for protection of the public and any affected personnel due to the use of portable gauges by Gazzola Paving Ltd.

OVERVIEW

The nuclear gauge is used to calculate and display percent compaction of Asphalt using a radiation source and based on user defined laboratory values.

Any worker who is required to perform duties with a reasonable probability of receiving a radiation dose greater than 1 mSv per year is defined as a nuclear energy worker (NEW). The regulatory dose limits for NEWs are 50 mSv per year and 100 mSv over a five-year period.

Definitions:

Becquerel (Bq):

The International System of Units (SI) unit of radioactivity. One becquerel (Bq) is the activity of a quantity of radioactive material in which one nucleus decays per second. In Canada, the Bq is used instead of the non-SI unit curie (Ci).

Canadian Nuclear Safety Commission (CNSC):

Canada's nuclear regulator, established under the Nuclear Safety & Control Act to regulate the use of nuclear energy and materials to protect health, safety, security and the environment.

Dose:

The radiation absorbed by the body.

Dosimeter:

A device for measuring a dose of radiation that is worn or carried by an individual. There are several types of personal dosimeters such as on optically stimulated luminescent dosimeters (OSLD) and direct reading dosimeters (DRD).

Ionizing Radiation:

Radiation capable of producing ion pairs in biological material(s).

Licensee:

A company or a person to whom a CNSC license has been issued for the possession and use of nuclear substances and radiation devices.

Section 13-8 – Radiation Protection

Nuclear Energy Worker (NEW):

A person who is required, in the course of the person's business or occupation in connection with a nuclear substance or nuclear facility, to perform duties in such circumstances that there is a reasonable probability that the person may receive a dose of radiation that is greater than the prescribed limit for the general public.

Radiation Safety Officer (RSO):

A radiation safety specialist implements and administers a radiation safety program.

Sivert (Sv):

The International System of Units (SI) unit of equivalent dose and effective dose, equal to 1 joule/kilogram.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Assist in developing corporate health and safety documentation, policies and procedures where required.
- Schedule and coordinate training as required.
- Comply with all the requirements as defined under the Nuclear Safety and Control Act (NSCA) and the Requirements of the (CNSC) in addition to the Occupational Health and Safety Act (OHSA) and Regulations.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.

Senior Management Responsibilities:

- Obtain and maintain the license to operate nuclear portable gauges issued by the Canadian Nuclear Safety Committee (CNSC).
- Develop and maintain the radiation protection program to ensure ensure that doses are kept as low as reasonably achievable (ALARA).
- Inform workers of their status upon becoming Nuclear Energy Workers (NEW)s and maintain records of the informed consent.
- Ensure all company employees receive the appropriate training and workplace specific overviews.
- Comply with all the requirements as defined under the Nuclear Safety and Control Act (NSCA) and the Requirements of the (CNSC) in addition to the Occupational Health and Safety Act (OHSA) and Regulations.
- Ensure that the equipment, materials and protective devices as prescribed are provided, maintained in good condition and used as prescribed.
- The measures and procedures prescribed are carried out in the workplace;

Radiation Safety Officer Responsibilities:

- Ensure the effective management and implementation of the Radiation Protection Program.
- Ensure the safe use and maintenance of the nuclear portable gauges in accordance with the licensing and requirements by the CNSC.

Section 13-8 – Radiation Protection

- Immediately report to the CNSC duty officer about any unusual events, accidents or incidents involving the portable gauges.
- Maintain their status as the Radiation Safety Officer through maintenance of the training requirements.
- Works in the manner and with the protective devices, measures and procedures required by the Nuclear Safety and Control Act (NSCA) and the Requirements of the (CNSC) in addition to the Occupational Health and Safety Act and Regulations;
- Advise radiation workers of the existence of any potential or actual danger to the health or safety of the worker of which the is aware of;
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker.

Radiation Workers Responsibilities:

- Ensure the safe conduct of their work, and comply with all applicable regulatory requirements.
- Comply with the radiation protection program established by **Gazzola Paving Ltd.**, in accordance with regulatory requirements.
- Ensure the portable gauge is either under the constant surveillance of a worker, secured in a transport vehicle, or at the storage location.
- Works in the manner and with the protective devices, measures and procedures required by the Nuclear Safety and Control Act (NSCA) and the Requirements of the (CNSC) in addition to the Occupational Health and Safety Act (OHSA) and Regulations
- Report to the Radiation Safety Officer any contravention of the Nuclear Safety and Control Act (NSCA) and the Requirements of the (CNSC) in addition to the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device;

RADIATION

Radiation is energy emitted by an atom or other body as it changes from a higher energy state to a lower energy state. Radiation can be classified as ionizing or nonionizing radiation. Nuclear energy produces ionizing radiation.

Natural background radiation is found in building materials, soil, rocks, air, some foods, and our bodies. It contributes to about three quarters of our annual radiation exposure.

Radiation dose examples

Dose which may cause symptoms of radiation sickness	1,000 mSv
Five-year dose limit for nuclear energy workers	100 mSv
Annual dose limit for nuclear energy workers	50 mSv
Typical chest CT scan	7 mSv
Average annual dose from natural background radiation in Canada	1.8 mSv
Annual public dose limit	1 mSv
Average annual dose to a portable gauge worker	< 1 mSv
Typical cross-Canada flight	0.02 mSv

Section 13-8 – Radiation Protection

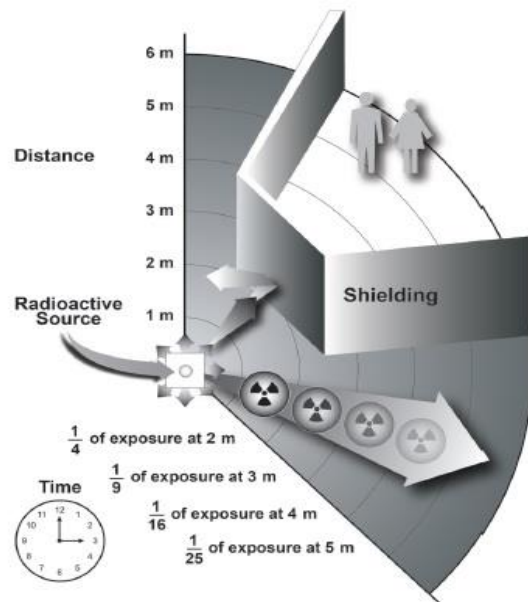
RADIATION PROTECTION

The principles of radiation protection include:

Time – The shorter the time spent close to the source, the lower the radiation dose received will be.

Distance – The intensity of radiation decreases sharply as a person moves farther away from the radioactive source.

Shielding – The thicker the protective material placed between the person and the source, the less radiation to which a person will be exposed. The shielding material must be appropriate for the type of radiation..



RADIATION PROTECTION PROCEDURE

License:

The CNSC is the federal agency responsible for regulating the nuclear industry in Canada. The CNSC enforces the NSCA and its regulations, issue licences and certify radiation devices. The CNSC also continually monitor licensees to ensure compliance with regulatory requirements. All radiation devices used in Canada must be certified, to ensure they are safe for use for their intended application.

Gazzola Paving Ltd. has been issued licensing by the CNSC to operate portable gauges for the purposes of Asphalt Sampling. Licensing is maintained following a successful audit by the CNSC every 2 years. **Gazzola Paving Ltd.** will comply with all measures, procedures and requirements for the purpose of maintaining licensing. A copy of the license will be posted in the Asphalt Lab.

Radiation doses:

Gazzola Paving Ltd. will record doses for all persons that are present or perform work with or around portable gauges to ensure that doses are kept as low as reasonably achievable (ALARA) and that workers do not exceed the prescribed dose limits.

All involved workers must use and wear an approved dosimeter from a CNSC licensed dosimetry services provider. Dosimeters readings are analyzed quarterly by a certified laboratory and a result report is provided. The reports must be available to all involved workers for review on a regular basis.

Workers must implement the following while using personal dosimeters:

- Wear the personal dosimeter on the front of the trunk of your body
- Dosimeters must not be shared
- Store as recommended by the manufacturer in low radiation background areas

Section 13-8 – Radiation Protection

- Follow manufacturer/supplier recommendations for care and use of dosimeters
- Dosimeters should not be exposed to:
 - high temperatures
 - water
 - direct sunlight or
 - fluorescent light

Most portable gauge workers are not considered nuclear energy workers (**non-NEWS**). However, if there is a reasonable probability that doses may approach 1 mSv/year, **Gazzola Paving Ltd.** must inform the non-NEW workers that they are a NEW and will retain the records of informed consent.

Training:

All **Gazzola Paving Ltd.** portable gauge workers must be trained on the following:

- Basic radiation safety information, including keeping doses as low as reasonably achievable (ALARA)
- Asphalt Lab Operations WTS, this radiation protection program including worker responsibilities and regulatory requirements
- Transportation of Dangerous Goods (Class 7)

Radiation Safety Officer Training:

At **Gazzola Paving Ltd.**, the asphalt lab supervisor is the designated Radiation Safety Officer. The lab supervisor must maintain their certification as the Radiation Safety Officer responsible for the effective management and implementation of this program. Training includes radiation protection principles, methods and practices in accordance with the regulatory requirements.

All required training must be refreshed every 3 years at a minimum.

Transportation:

- When packaging the gauge for transport, make sure the shutter is fully closed. Ensure the gauge and transport case are not damaged, and that the transport case has all the required markings and labels.
- The gauge must be locked and secured to the truck while in transport.
- All workers handling, transporting or storing the nuclear gauge must be competent and trained in accordance with the Transportation of Dangerous Goods Regulations (Class 7). Gauge operators must have their (TDG) certificate with them at all times.

Operation:

- Before you start using the portable gauge, ensure to attach your radiation exposure dosimeter between your neck and waist.
- Inform the site supervisor of your attendance, sign off on the Gazz Card before taking your asphalt sample.
- When using the gauge, don't hover over it or point it at anyone while the source is exposed.

Section 13-8 – Radiation Protection

- Keep your co-workers and anyone else in the area at least two meters away from the gauge. Once it is set, move away from the gauge.
- Gauges must always be under direct supervision by a competent and trained person (Radiation Safety Officer). The gauge must be locked safely and securely if unattended

Storage:

The gauge must be stored inside the Asphalt Lab C-container, the container must be locked and secured with access allowed to authorized workers only. The C-container must be identified with the radioactive hazard label on it at all times.

When not in use and before storing or transporting the portable gauge:

- Ensure the gauge shutter is properly functioning and fully closed. (A portable gauge with an open or partially open shutter poses a risk of exposure to the worker and the public. If the shutter cannot be closed, the Radiation Safety Officer must be notified immediately so that this situation can be reported to the CNSC)
- Store the gauge in its locked, tamper-resistant container (Type A labeled transport case).
- Identify the package with the carrier's name, in case the gauge is lost, damaged or misplaced.

Maintenance:

The portable gauge must be leak-tested annually in accordance with the regulatory requirements. Leak tests will be conducted to detect a leak of 200 Bq or more.

If the portable gauge was found to be leaking:

- Remove the gauge from service immediately, place it in the package container and attach an "Out of service" tag on the container.
- Place the package container in the designated storage C-container. Only authorized and trained workers are allowed access to the C-container.
- Notify the CNSC duty officer immediately at 1-844-879-0805.

Radiation Survey Meters:

A radiation survey meter measures the radiation dose rate level at the position checked. In compliance with the regulatory requirements, **Gazzola Paving Ltd.** will ensure that a calibrated radiation survey meter be available within two (2) hours' distance of the site where a radiation device (gauge) is used as authorized by the licence.

Radiation survey meters must be calibrated every 12 months in accordance with CNSC requirements.

EMERGENCY PROCEDURES

Gazzola Paving Ltd. has developed emergency procedures to respond and manage emergency situations and as plans of action in cases of loss, theft, fire, an accident or damage to the portable gauge.

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In general, the following steps should be followed:

- Stop work immediately.
- Keep people at least 2 metres away (approximately 6 feet) until the source is removed or until radiation levels are known to be safe.
- Immediately inform the radiation safety officer.
- If the damage is minor, and the source is in the safe, shielded position, the transport case can be used to transport the device. If you do not have a radiation survey meter, do not move a damaged gauge until its radiation level is checked.
- If the damage is severe or the source rod will not retract, an alternate transport case may be used. A calibrated survey meter must be used to ensure safe radiation levels.
- Before the site is reopened for regular use, the Radiation Safety Officer must ensure that all sources have been recovered.
- In case of an accident or fire, do not use the gauge until the damage is assessed. A leak test must be performed after any incident that may have resulted in source damage.
- Inform the CNSC immediately of any theft, accident or incident.

Lost or stolen gauges

- A missing or stolen radiation device containing radioactive source(s) can be a significant hazard if found by members of the public unaware of the radiation danger. It is critical that all personnel working with a radiation device be aware of the security implications.
- Immediately report any lost or stolen radiation device or nuclear substance, or vehicle containing a radiation device or nuclear substance to the CNSC by calling the CNSC duty officer at 1-844-879-0805.
- The Radiation Safety Officer should also immediately report a loss or theft to the Police.

COMMUNICATION

This program is to be communicated with all workers involved in the handling, transporting, storage and operation of nuclear radiation portable gauges.

RECORDS

Records of; licensing, training, samples, equipment inspections and Calibration shall be completed and kept on file.

These records may/ will be used as reference material.

DISTRIBUTION

All workers involved in the handling, transporting, storage and operation of nuclear radiation portable gauges shall receive copies of the agreed to safe work procedures and these are to be made available upon request to the Joint Health and Safety Committees and/ or Worker Representatives.