

2017

Occupational Health & Safety Program



SAFETY@WORK

EVERYONE, EVERYTHING, EVERYDAY

Health PEI

3/1/2017

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Definitions

Employee:	Any persons in an employment relationship with Health PEI as well as any person involved in providing care and/or services within Health PEI facilities and programs, including fee-for-service physicians, students and contract workers.
Employer:	A person who employs one or more workers or contracts for the services of one or more workers, and includes a constructor or contractor.
Hazard:	Any source of potential damage, harm or adverse health effect.
Personal Protective Equipment:	A piece of equipment or clothing designed to be used to protect the occupational health or safety of a worker.
Risk:	The chance or probability that a person will be harmed or experience an adverse health effect.
Safe Work Procedure:	A description of the safest and most effective way to perform a task. It lists 1) the risk/hazard involved in performing the task, 2) the personal protective equipment, training and/or techniques required and 3) the steps to complete the activity without incident.
Therapeutic Interventions:	An intervention such as immunization that is given to health care workers to reduce the risk of occupational illness.
Training:	Skills and competencies acquired as a result of the teaching of practical skills.
Workplace:	A place where a worker is or is likely to be engaged in an occupation and includes a vehicle used by a worker in an occupation.

Your Safety is Vital to Health PEI's Mission

Health PEI's Occupational Health and Safety (OH&S) Program is an organized, written action plan to keep our employees safe by identifying and controlling hazards and defining safety responsibilities. An OH&S program is required under the *OH&S Act* for provincially-regulated employers on Prince Edward Island with 20 or more regularly employed workers. The objective of an OH&S program is to integrate health and safety into all work practices and conditions. At Health PEI we want everyone to be thinking about safety in everything they do everyday they are working.

Internal Responsibility System

The OH&S Program is based on the concept of the internal responsibility system:

Every person in the workplace is responsible for their health and safety and that of their co-workers.

This is the philosophical foundation for the *OH&S Act* and applies to everyone, including senior leadership, managers, employees, physicians, students, volunteers, contractors, self-employed individuals, owners and suppliers of materials.

Employer Role and Responsibilities

Chief Executive Officer

- Will ensure that Health PEI is in compliance with the *OH&S Act* and *Regulations*.
- Will ensure the OH&S policy and program are fully implemented at all Health PEI facilities.
- Will ensure all reasonable care is taken to:
 - Ensure the Occupational Health and Safety of employees, and
 - Demonstrate compliance with the *OH&S Act* and OH&S Program.

Executive Directors/Directors

- Provide a statement of policy relating to the OH&S program.
- Ensure that all established safety policies are administered and enforced in all areas.
- Ensure that all personnel are aware of and effectively practicing the policies and procedures set out in the health and safety program.
- Provide information, instructions, and assistance to all supervisory staff in order to protect the health and safety of all employees.
- Understand and enforce Health PEI Occupational Health and Safety policies as well as Occupational Health and Safety legislation.

Managers/Supervisors

Supervision plays a significant role in protecting the health and safety of employees. Health PEI supervisors shall supervise their employees to ensure that the employee is taking every reasonable precaution to protect his/her own health and safety and that of others at the workplace.

- Ensure that all employees are informed of the policy and are advised of their rights and responsibilities.
- Provide leadership in the prevention of occupational illness/injury in their workplaces by fostering a

culture of safety.

- Be knowledgeable about the work processes, the hazards involved and actively seek out emerging hazards.
- Conduct regular checks and audits of the workplace to identify potential hazards
- Ensure prompt and appropriate action is taken when hazards are identified.
- Ensure that equipment and machinery is properly used and maintained.
- Ensure all employees receive information, instruction and training and are competent with work processes and equipment.
- Ensure all employees are informed of the hazards involved with the worker and the control measures for the hazards.
- Ensure the appropriate personal protective equipment is provided, maintained and readily available for employees.
- Ensure that all employees that are required to wear respirators are fit tested according to Health PEI Fit Testing: N95 Respirator policy.
- Provide supervision that is adequate for the level of hazard.
- Performance manage and/or discipline employees in keeping with collective agreement language employees who do not wear personal protective equipment or do not follow safe work procedures.
- Participate in and /or conduct accident/incidents investigation as required and review implement and communicate the follow up on corrective actions to prevent reoccurrences.
- Following any workplace injury, provide information to healthcare workers regarding the resources that are available for counselling/emotional support.
- Maintain records of training and performance management or discipline related to occupational health and safety issues.
- Understand and enforce Health PEI OH&S policies as well as the *OH&S Act* and *Regulations*.

Occupational Health and Safety Officers:

- Ensure that the OH&S Program and policies are developed, implemented, communicated and evaluated.
- Ensure OH&S Committees or representatives are in place and functioning in all Health PEI work sites as required by the *OH&S Act*.
- Provide advice, consultation, assistance and education regarding occupational health and safety issues.
- Assist departments with the selection of appropriate personal protective equipment.
- Assist departments with the development of safe work procedures.
- Record and analyze information on workplace injuries and illness.
- Analyze accident and injury trends and provide data to the organization.
- Maintain contact with regulatory professional bodies.
- Keep current with recommended codes of practice and new safety and health literature.
- Assist in accident investigations, analysis and preparation of accident reports and summaries.
- Assist with safety seminars and training.
- Understand and enforce the *OH&S Act* and *Regulations*.

Worker Rights and Responsibilities

Every employee has the right to:

- a safe workplace
- information on issues that affect their health and safety,
- refuse unsafe work, and
- participate on health and safety committees or be a health and safety representative.

With these rights also come responsibilities. An employee, while at work, shall:

- take every reasonable precaution to protect their own occupational health and safety and that of other persons at or near the workplace;
- participate in information, instruction and training sessions about work processes, the hazards involved and the control measures for the hazards;
- apply the principles outlined in the information, instruction and training provided to their work;
- follow established safe work procedures;
- wear or use personal protective equipment, as required;
- report any hazards, unsafe conditions or unsafe acts to the supervisor; and,
- comply with the *OH&S Act and Regulations*.

Right to Refuse Work

Every employee has the right and the responsibility to refuse work if he or she believes the work is likely to endanger their health or safety or the health and safety of another employee.

If you believe a task or situation is unsafe, follow the procedure below:

- Report the concern to the supervisor immediately;
- Go to a safe place but stay at the workplace as other work may be assigned;
- The supervisor will investigate the work refusal promptly with you
- If the supervisor agrees with you, your supervisor will address the safety concern before any more work can be carried out;
- Once agreement has been reached that the task or situation is no longer unsafe, you are expected to return to work.

If the supervisor disagrees with you that the task or situation is unsafe but you still feel unsafe, you shall:

- Report the concern to the Occupational Health and Safety committee or representative, or to the Health PEI Occupational Health and Safety Officer.
- The supervisor may ask another employee to do the job but must inform the replacement that a work refusal has occurred, the hazards reported and reasons for the refusal.
- Your concern will be investigated. If the investigator agrees with the refusal, they will recommend to the supervisor that the problem be rectified prior to returning to work. If they disagree, you will be advised to return to work.
- If you still feel unsafe, report the concern to the Workers Compensation Board Occupational Health & Safety Officer and your concern will be further investigated.
- Your right to refuse is protected under the law from discriminatory action to the point in time when you are advised to return to work by the WCB Occupational Health and Safety Officer.

Workplace Occupational Health and Safety Committees/Representatives

Most Health PEI worksites are large enough to have their own workplace OH&S Committee. This Committee is a group of employee and employer representatives working together to identify OH&S problems, consider their impact on the workplace and make recommendations to management on corrective measures. The committee does not deal with other labour/management issues.

Health PEI has OH&S Committees at each worksite that employ 20 or more employees on a regular basis. At least half of the committee membership must be composed of elected union representatives, the remainder of the committee will be management representatives. Each Committee has Terms of Reference and are to meet on a monthly basis unless otherwise approved in writing by the Workers Compensation Board Director of Occupational Health and Safety.

Worksites employing between 5 and 19 employees are required to designate a health and safety representative instead of a committee.

Committee members bring a variety of backgrounds, skills and experiences including technical and deep knowledge about jobs and work environments, how various jobs or activities affect one another, and of departmental policies, procedures and resources. Together, the committee has a wealth of knowledge to make a significant contribution to workplace health and safety. The OHS committees also create the opportunity for workers and management to work together to resolve common occupational health and safety concerns, develop greater understanding between managers and workers and build trust and mutual respect.

Committee Work

The scope of the Committee's work is set out in Section 25 of the *OH&S Act*, which includes:

- Cooperating to identify hazards to occupational health and safety in the workplace and effective systems to respond to the hazards;
- Receiving, investigating and promptly dealing with issues regarding occupational health and safety;
- Participating in workplace inspections, inquiries and investigations respecting the occupational health and safety of employees in the workplace;
- Advising the employer on individual protective equipment, devices and safety features that are best suited to the needs of employees, within the provisions of the *Act* and *Regulations*;
- Advising the employer regarding a policy or program required pursuant to the *Act*;
- Making recommendations to the employer, employees and any other person for the improvement of the occupational health and safety of persons at the workplace (see Appendix A: *Submitting an Occupational Health and Safety Concern*); and
- Maintaining records and minutes of committee meetings in a form and manner approved by the Workers Compensation Board Director of Occupational Health and Safety and providing the Workers Compensation Board Occupational Health and Safety Officer with a copy of these records or minutes upon request.

The OH&S committee will maintain records of minutes, workplace inspections, recommendations, and committee members.

Information Posting

Health PEI recognizes the need to make information available in a suitable and timely manner. Health PEI will use a combination of safety notice boards, e-mail, the Staff Resource Centre (Intranet), office binders and written notices to inform workers on matters affecting their health and safety.

The Occupational Health and Safety Committee/Representatives will assist with posting and/or dissemination of the following information on worksite OH&S bulletin boards in accordance with the *Act* and Regulations as follows:

- The names of the current committee members or representatives as and the means of contacting them.
- The minutes of the most recent committee meeting. Ensure they remain posted until superseded by the minutes of the next committee meeting.
- A code of practice required under the *OH&S Act* or *Regulations*.
- A current telephone number for reporting serious workplace accidents.
- The Occupational Health and Safety policy.
- Orders of the Workers Compensation Board Occupational Health and Safety Officer.

Workplace Inspections

Workplace inspections are one of the most important incident prevention tools in the OH&S Program as they promote the maintenance of safe working conditions and the removal of any potential hazards that arise in the workplace. Inspections of every work area of each Health PEI worksite shall be completed by members of the OH&S Committee/or representative or any other trained person on a minimum yearly basis. Employees shall inspect their work area for workplace hazards on a daily basis prior to work beginning and prior to start up of any equipment, or machinery that includes removal of clutter, and identification of any lock out/tag outs in place.

The following is the procedure for conducting workplace inspections:

- The inspection team will consist of two representatives from the OH&S Committee.
- The inspection team and the Department to be inspected are designated at the OH&S Committee meetings on a yearly schedule.
- The inspection team will ensure that the Department Manager or designate is made aware of the inspection and will be invited to accompany the inspection.
- The *Health PEI Occupational Health and Safety Provincial Workplace Inspection Checklist* (Appendix B) will be used by the team to assist in identifying common hazards in the workplace.
- The *Health PEI Workplace Inspection Recording Form* (Appendix C) will be completed during or immediately following the inspection.
- The *Workplace Inspection Recording Form* will identify:
 - a) Location and date of Inspection
 - b) List of hazards
 - c) Description of the type of hazard
 - d) Level of risk is assigned by a checkmark in the appropriate box. See reverse of “Workplace Inspection Recording Form” for definitions and risk level assignment
 - e) Repeat item is identified by a checkmark under Yes or No, if hazard has been noted on last inspection.
 - f) Copies - write in names of persons copies are to be sent to (Manager/Administrator)

- g) Inspected by - Sign the form
- h) Inspectors provide a copy of the inspection to the appropriate manager/administrator.
- i) Manager completes Action Plan indicating what was done to correct the hazard.
- j) Manager enters the date the hazard was resolved.
- k) Inspectors bring the incomplete "Workplace Inspection Recording Form" to the next Occupational Health and Safety Committee meeting
- l) The Manager completes the Inspection Form Action Plan and Resolved column of the "Workplace Inspection Recording Form".
- m) Managers sends original to the OH&S Committee Chair within 30 days from the date of Inspection regardless of whether all hazards have been resolved. The 30 day expectation to have a written action plan is according to the *OH&S Act*.
- n) The completed Workplace Inspection Recording Form will be reviewed at the next meeting of the OH&S Committee.
- o) Following review of the completed Workplace Inspection Recording Form by the Committee, copies of the form will be sent to the Director/Administrator for review and information.
- p) For Inspections that have not been returned to the OH&S Committee with a completed Action Plan within 30 days, an email reminder will be sent from the Chair of the OH&S Committee to the Department Manager.
- q) For Inspections where there have been Repeat Items identified, the Chair of the OH&S Committee will send an email to the Manager of the Department with a carbon copy (cc) to the Director/Administrator.
- r) The Occupational Health and Safety Officer acts a resource to the OH&S Committee to develop Workplace Inspection Processes and to Managers to develop Action Plans.

Hazard Identification System Process

A hazard is an unsafe condition or activity that, if left uncontrolled, can contribute to an unintentional injury or illness. Before hazards can be controlled, they must be identified. This identification of hazards can be accomplished through a systematic hazard analysis program that includes job safety analysis (or hazard assessment), inspection, measurement and testing and incident investigation.

It is the policy of Health PEI that all existing and potential hazards to the health or safety of employees will be identified. All reasonable practical steps will be taken to eliminate or control (reduce) all identified hazards. The first priority should be to eliminate the hazard however in some cases it may not be possible to do so. The following list in priority from most to least effective, describes ways to control hazards as follows:

- Elimination: For example, remove a piece of equipment, move employees to different work space.
- Substitution: For example, replacing a noisy machine with a quieter one.
- Engineering: For example, install shields or barriers, enclose a piece of equipment to reduce contaminant exposure, or improve ventilation.
- Administrative: For example, education and training, supervision, signage and good housekeeping.

When a hazard is identified, the next step is to perform a Hazard Analysis which will guide whether there needs to be development of written Safe Work Procedures, Guidelines and Safety Rules to reduce the risk of injury to employees.

Manager/Supervisor Responsibilities:

- Prepare a current list of hazards in the workplace.
- Develop and implement written safe work procedures, safety guidelines and safety rules.
- Inform employees about the hazards and risks in the workplace.
- Educate and train employees on required control measures to keep them safe at work.
- Develop procedures to respond to an emergency.
- Include hazard identification and control strategies as part of new employee orientation.

Employee Responsibilities:

- Comply with safe work practices, procedures, guidelines and rules.
- Inform manager/supervisor of hazards encountered in the workplace.
- Work with the manager/supervisor to resolve hazardous situations.

Occupational Health and Safety Officer/OH&S Committee Responsibilities:

- Assist the manager/supervisor to identify, assess and control hazards.
- Monitor the effectiveness of the implemented controls.
- Ensure training programs regarding identified workplace hazards are developed and implemented for employees.

Hazard Analysis

A Hazard Analysis is a process of breaking down the tasks associated with completing a job, and identifying the potential hazards associated with completing those individual work steps. An analysis is then completed to determine the severity and likelihood that injury will occur which dictates whether a Safe Work Rule, Guideline or Procedure must be developed to eliminate or minimize the risk of injury to employees. The following tool and steps shall be used to complete a Hazard Analysis.

Steps for Completion of Hazard Analysis and Critical Task Inventory Worksheet (Appendix D):

- 1) **Identify and list** all critical tasks (high risk tasks) performed as part of a work process or work role.
- 2) **Break each task into steps.** Analyze each task by reducing it to steps performed. List all the steps in each task.
- 3) **Identify potential hazards in each step.** List the things that could go wrong. Use your experience, accident history and near-miss information. Assess the work environment. What hazardous materials are being used? Are there concerns with heat or cold? Are there lighting, ergonomic or noise considerations? Do the seasons or conditions affect the way the work is to be done?
- 4) **Assign a Potential Consequence Rating,** using below scoring table. Consider experience, accident history and estimated potential for serious consequences should something go wrong.
- 5) **Assign a Probability Rating,** using below scoring table. Consider the number of workers responsible to perform the task, the amount of time that they are exposed, and the various control measures that are in place.

POTENTIAL CONSEQUENCE RATING		
RATING	POTENTIAL CONSEQUENCE	RESULT
2	Low	Probably would result in only minor injury and would not affect employee health or cause property damage.
3	Moderate	May cause non-serious injury or minor occupational illness resulting in lost workday(s) or minor property damage.
4	High	May cause severe injury, severe occupational illness or major property damage.
5	Very High	May cause death or loss of function.

PROBABILITY RATING		
RATING	PROBABILITY	LIKELIHOOD
1	Very Low	Unlikely to occur.
2	Low	Possible to occur.
3	Moderate	Probably will occur in time.
4	High	Likely to occur within a short period of time when an employee is exposed to the hazard.
5	Very High	Very likely to occur immediately.

6) Assign a Hazard Analysis score.

Multiply the consequence rating number by the probability rating number you assigned to determine next steps:

A Hazard Analysis with a rating number of:

12 or above requires a written Safe Work Procedure;

8 to 9, written Safety Guideline;

4 to 6, Safety Rule and

3 or lower will be reviewed with staff at new employee orientation.

7) Controls: Suggest ways to control or eliminate the hazards in each step.

List what must be done to make the task safer and more efficient. Is there a way to substitute or eliminate the task? Can it be altered to reduce or remove the risk? Answering these questions will assist in development of any Safe Work Rules, Guidelines or Procedures that require development. The Occupational Health and Safety Officer may be consulted during this process.

Development of Safe Work Procedures, Guidelines and Safety Rules

Safe Work Procedures are step by step instructions that describe the way a task must be done for improved health, safety, efficiency, or accuracy. The *OH&S Act* requires employers to implement an OH&S program that includes *“the preparation of written safe procedures required to implement safe and healthy work practices.”*

Information to be included in a Safe Work Procedure is:

- The normal sequence of events and actions required to perform the work safely.
- Any hazards involved in performing the work, such as hazardous chemical or equipment and tools with potential hazards, and ways to eliminate or minimize the risks.
- PPE required.

The person who prepares the written safe work document should have knowledge of the task for which the procedure, guideline or safety rule is intended. See examples of acceptable format, description and required information in Appendix E: Safe Work Procedure Template, Appendix F: Sample Safe Work Procedure, Appendix G: Safe Work Guideline Template, Appendix H: Safe Work Rule Template.

Accident and Incident Investigation

The objective of accident investigation is prevention. Finding the root cause(s) of an accident and taking steps to control or eliminate them can help prevent similar accidents from happening in future. Accident can rarely be attributed to a single cause; work environment, job constraints and supervisory and employee experience can each play a part. These factors must be examined to determine what role each had in causing the accident.

There is a great benefit in conducting near miss investigations. The International Association from the Prevention of Accidents has research indicating that there are 189 incidents resulting in no injury for every three incidents resulting in time loss. The near misses indicate the risk for an accident that often results in an injury at some point.

When an accident/incident occurs the manager/supervisor will conduct, participate in or direct the investigation and remedial actions.

The procedure to be followed by Managers/Supervisor when conducting an accident/incident investigation is outlined below:

1. Ensure there is no further potential for harm.
2. Ensure that First Aid is provided to employee(s) as required.
3. Arrange transportation of employee to seek medical treatment as required.
4. For reporting requirements for serious (Level 4 & 5) injuries refer to Employee Event Reporting Policy. The OH&S Division of the WCB must be informed by calling 902-628-7513.
5. If a serious injury occurs, secure the scene with barrier tape. Lock out any machinery involved.

Except as otherwise directed by a WCB Occupational Health and Safety Officer, No person shall disturb the scene of an accident that results in a serious injury or fatality except to the extent that it is necessary to:

- a) Attend to the persons injured or killed;
- b) Prevent further injuries; or
- c) Protect property that is endangered as a result of the accident

6. Interview the employee(s) involved in the incident separately.
7. Obtain names of witnesses. Interview them as soon as possible and document interviews.
8. Review work procedures, inspect machinery, and check maintenance records.
9. Ensure that an Employee Event has been entered into the Provincial Safety Management System (PSMS) by the end of shift or within 24 hours.
10. Ensure Workers Compensation Board forms including Workers Report – Form 6 and Employer Report - Form 7 are completed. Available from www.wcb.pe.ca.
11. Determine root causes(s) and Document follow up interventions and recommendations in the Employee Event Report in the PSMS.
12. Ensure recommendations are implemented including development/revision of Safe Work Procedures.
13. Follow up with the injured employee on a regular basis.
14. Monitor effectiveness of Safe Work Procedures.

Record Keeping

Written records and statistics can help identify trends of unsafe work conditions practices so that action can be taken to correct these potential hazards. Records must be kept on all aspects of the Occupational Health and Safety Program to establish due diligence.

Health PEI will maintain the following written records:

- Inspection Reports and written actions taken.
- Employee Event reports and follow-up documentation.
- Employee orientation records.
- Employee attendance records at Occupational Health and Safety education/training sessions.
- Records of performance management discussions or progressive discipline related to unsafe work performance.
- Occupational Health and Safety Committee minutes and reports.
- Preventative maintenance inspection schedules and records.
- Equipment maintenance records.
- Employee health records for example hearing tests, immunization status, respirator fit testing etc.

It is the responsibility of the manager and supervisor to ensure that the necessary records required by the Occupational Health and Safety program are up to date and maintained according to Records Information Management (RIM) guidelines.

Education and Training

Health PEI recognizes that occupational health and safety education and training is a valuable part of accident/injury prevention. Education is knowledge acquired by learning and instruction. Training is skills and competencies that are acquired as a result of the teaching of practical skills.

Occupational health and safety education and training is:

- The basic means of preventing injury and illness in the workplace.
- A method of making sure employees are knowledgeable about their jobs.
- A means of making sure employees can do their work in the safest and healthiest way.
- An important part of an occupational health and safety program.
- A means of improving productivity, and ensuring a more competent knowledgeable workforce.

Managers and supervisors have an important role to play in the education and training program. An effective occupational health and safety program will ensure that managers and supervisors know the following:

- Their roles and responsibilities in the Health PEI Occupational Health and Safety Program.
- Their function in the internal responsibility system.
- Their roles in due diligence.
- Their responsibilities for establishing and maintaining a healthy and safe work environment.

Employees have varied education and training needs based on their job, work environment, experience and previous education and training. Managers and supervisors are responsible to assess the occupational health and safety learning needs of their employees, to develop education and training that meets the learning needs of the work unit and considers adult learning principles and literacy level of employees. Managers/supervisors are responsible to maintain records of education and training provided.

General areas in which employees shall be provided education and training specific to their work hazards which shall include but may not be limited to:

- Employee roles and responsibilities in the Occupational Health and Safety Program.
- How using safe work practices and procedures is necessary for safety.
- The proper use and maintenance of personal protective equipment including appropriate footwear (See Health PEI Footwear Policy)
- Hazards associated with their specific job tasks.
- Musculoskeletal Injury Prevention Program (MSIP) training, procedures and tools. (See Health PEI MSIP Policy and Implementation Guide)
- Workplace Hazardous Materials Information System (WHMIS) education and training.
- Violence Prevention and Management of Aggressive Behaviour education and training (See Health PEI Violence Prevention and Management of Aggressive Behaviour and Risk of Violence Alert Policy).
- Respiratory Safety and Respiratory Fit Testing requirements as appropriate (See Health PEI Fit Testing: N95 Respirator Policy)
- Immunization and TB testing requirements. (See Immunization and TB testing Policy)
- Scent Awareness education.
- Transportation of Dangerous Goods
- Confined Spaces
- The right to refuse unsafe work and process to do so.

- Hazard recognition and control.
- The process for reporting unsafe working conditions, workplace hazards, health and safety concerns, accidents and incidents.
- Employee roles and responsibilities in a workplace emergency.
- Roles and responsibilities of the Occupational Health and Safety Committee/representative at the workplace.

Occupational Health and Safety education and training will be delivered to employees on an ongoing basis and will also be provided as follows:

- For new employees during orientation.
- For employees who return to work after extended absences
- For employees who have changes in job tasks.
- When there are changes in the workplace that present new potential hazards.
- If previously unrecognized hazards are identified.
- When incident/accident trends indicate the need for further training and education.

Supervision

Supervision plays a significant role in protecting the health and safety of employees. Health PEI supervisors must supervise their workers to ensure that the worker is taking every reasonable precaution to protect his/her own health and safety and that of others at the workplace. Adequate supervision includes:

- Ensuring proper orientation, education, and training of workers.
- Observing workers after training to ensure that they follow safe work procedures and are competent using equipment.
- Doing informal inspections on a daily basis to ensure hazards in the work environment are controlled.
- Supervising workers based on the level of risk associated with the hazard(s) in the work area.
- Ensuring occupational health and safety policies and procedures are followed.
- Ensuring workers use/wear personal protective equipment as required.
- Disciplining workers for health and safety infractions.
- Maintaining records of training and discipline.

Hearing Conservation

Hearing conservation is an important aspect of an overall safety and health program. The impact of excessive noise is well documented and can lead to permanent and irreversible noise induced hearing loss.

The purpose of the Hearing Conservation Program is to prevent Health PEI employees from sustaining noise induced hearing loss as a result of their work environment. This is in accordance with the *Occupational Health and Safety Regulations: Part 8: Noise* which states “An employer shall ensure that practicable means are used to reduce the noise to which workers are exposed in areas at the workplace where workers may be present”.

Health PEI recognizes employee noise exposure can be reduced by substitution, engineering and/or administrative controls. Substitution means that when noisy equipment is replaced, equipment that generates less noise will be considered in the purchasing process. Engineering controls are such measures as redesign of existing machinery, the building of partial or total enclosures/barriers, and use of noise dampening equipment. Administrative controls include; education and training on use of hearing protection, and changes in work processes to reduce duration of exposure.

When substitution, engineering and administrative controls cannot adequately reduce the noise level to below decibel level and maximum time of exposure guidelines as required by the Occupational Health and Safety Act Regulations; proper hearing protection must be used and exposed employees are required to be included in a hearing conservation program.

Management, supervisory and employee commitment to hearing conservation are important aspects of the overall hearing conservation program. The key elements of Health PEI's Hearing Conservation Program are:

- Noise measurement screening for work areas where noise is reported to be potentially excessive.
- Education and training of hearing conservation measures.
- Substitution and engineered noise control measures.
- Provision of appropriate hearing protection appropriate to decibel level of exposure and type of work performed
- Warning Signs posted in excessive noise hazard areas.
- Annual audiometric testing.

Noise Measurement

A noise hazard must first be identified and quantified. Measurements are done to identify locations of concern and extent of employee exposure. The *Occupational Health and Safety Regulations* stipulate that if noise exposure is identified as potentially being excessive according to the “*Noise Exposure Level – Maximum 24 Hour Exposure Duration*” (Table - 1), the employer is required to carry out a noise assessment of the workplace using testing instruments and methods which adhere to Canadian Standards Association (CSA) Standard Z107.56-06 and ANSI Standard S1.25-1991.

Table 1: Noise Exposure Level – Maximum 24 Hour Exposure Duration in A weighted decibels (dBa)
(OH&S Regulations Section 8.3: *An employer shall ensure that a workers noise exposure does not exceed any of the following noise exposure limits*)

80	24 hours
82	16 hours
85	8 hours
88	4 hours
91	2 hours
94	1 hour
97	30 minutes
100	15 minutes
103	7.5 minutes
106	3.75 minutes
109	1.88 minutes
112	0.94 minutes
115 and greater	0 minutes

Noise level testing shall be arranged by the manager of the department in collaboration with site facility management staff for areas of noise concern. Noise level and employee exposure assessments may need to be contracted. Records of the assessment results will be kept by the manager of the area tested and/or the worksite maintenance department.

When there is a sufficient change in equipment, processes and/or the environment in an area documented to have excessive noise, retesting of noise levels and employee exposure shall be completed within one month of the change to determine if employees continue to require hearing protection.

Education and Training

Employees who work in documented areas with excessive noise exposure requiring hearing protection shall receive information on the following:

- What is excessive noise exposure?
- Health effects of excessive noise exposure.
- Noise control measures in place in the work unit.
- Proper care and fit of noise protection.
- Annual requirement for each exposed employee to have audiometric testing by a licensed audiologist arranged and paid for by the work department.
- Steps to follow if audiometric testing reveals noise induced hearing loss or employee notices signs of hearing loss.

Hearing Protection

Where the noise level is in excess of any noise exposure limit, Health PEI will provide at no cost to the employee) personal hearing protection. The hearing protection provided will be appropriate to the hazard type of work performed and the decibel level of noise exposure. Employees will be provided with

appropriate earmuffs, earplugs, or semi-insert devices for the Noise Reduction Rating (NRR) recommended with consideration of the employee's ear anatomy. At noise levels above 105 dBA, using earplugs and earmuffs together (dual protection) is required. Every employee in a posted noise hazard area shall wear appropriate hearing protection.

Posting of Noise Hazard Warning Signs

All areas where hearing protection is required shall have appropriate warning signs posted.

Hearing Tests

For work areas known to have excessive noise, the department manager will contract the necessary resources to provide annual audiology testing to all exposed employees. The manager will ensure that hearing tests are performed by a certified audiologist. The audiometric testing program includes:

- Audiograms at the time of hire for all new noise-exposed workers (not later than 6 months after start of employment).
- Baseline audiograms for all existing noise exposed workers.
- Annual audiograms for all noise exposed workers.
- Records of hearing tests will be maintained by the department manager in a confidential manner for the period of time designated by the Health PEI Recorded Information Management (RIM) guidelines.

Program Review

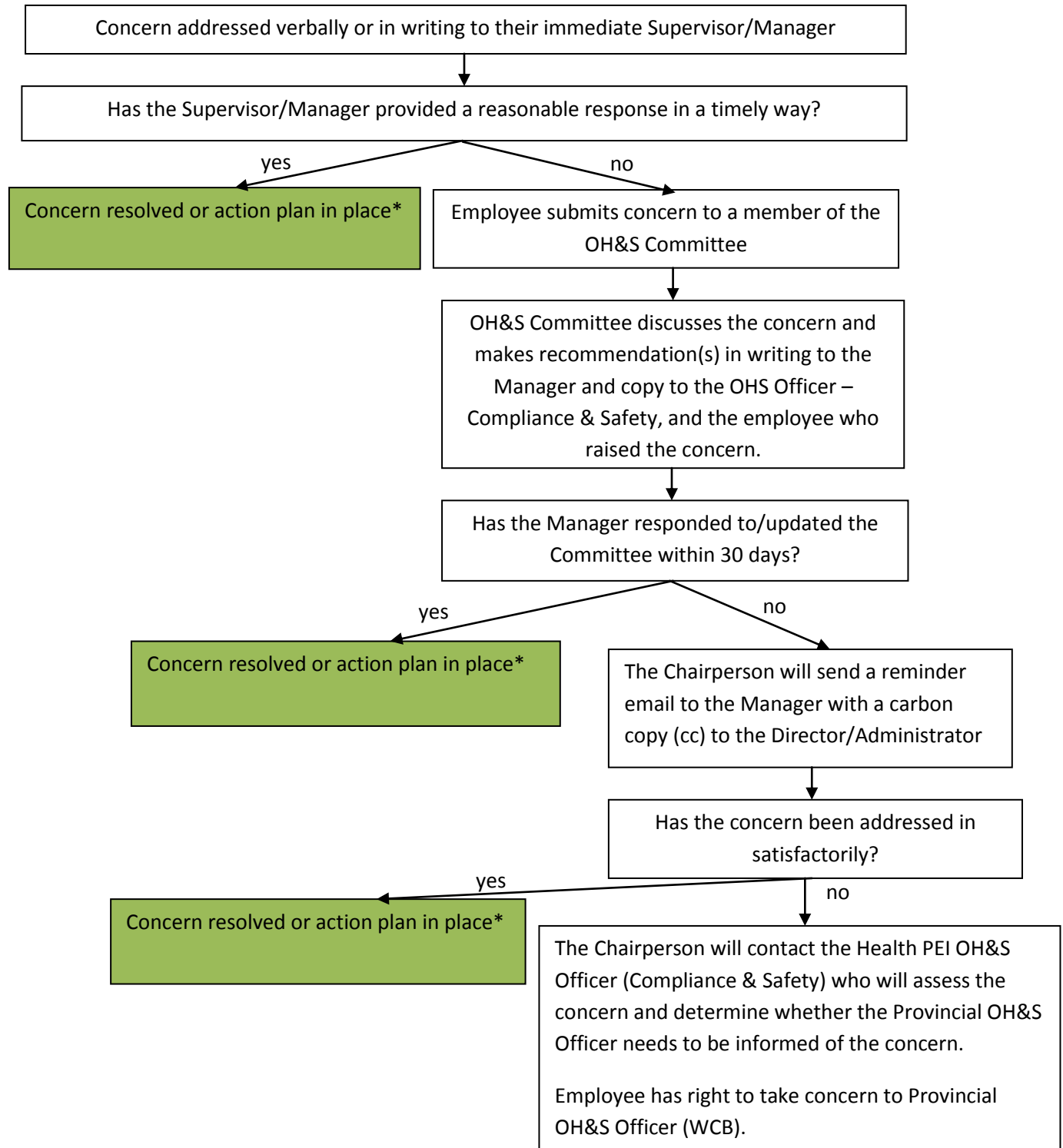
This program will be reviewed and/or revised on an annual basis.

Occupational Health & Safety Program Review

Managers are responsible for implementing and evaluating Health PEI's Occupational Health and Safety Program. This includes ensuring workers have adequate education, training, resources and time to carry out their responsibilities properly. Occupational Health and Safety Officers will determine if the Occupational Health and Safety Program is achieving its objectives of preventing workplace injuries and illness, and responding to incidents that occur by completing an annual evaluation of the OH&S Program which may include but is not limited to the following:

- Quarterly tracking and analyzing workplace incidents and injury data.
- Reviewing recommendations from workplace inspections and hazard analysis.
- Annual Site audits to measure compliance with CSA Z1000-14 OHS Standard.
- Annual Site percentage compliance with CSA Z1000-14 OHS Standard.
- Annual Organizational Performance Measure (OPM) with benchmarking to other Health Care Organizations.

Appendix A: Submitting an Occupational Health and Safety Concern



** Please note that the resolution must address the safety hazard and may not be the recommendation given by the employee or committee.*

Appendix B: Health PEI Occupational Health and Safety Provincial Workplace Inspection Checklist

Date:		Location:		
<i>NOTE: Please ensure all areas are checked by putting a check mark in one of the columns and comment as necessary.</i>				
Category/Location	satisfactory	unsatisfactory	N/A	Comments
Entrances/Exits/Stairways				
Clearly signed and illuminated				
Clear of wet/ice/snow/garbage				
Handrails secure				
Stairwell free of obstacles				
Wheelchair ramp in good repair				
Aisles and Corridors				
Clearly signed and illuminated				
Unobstructed and free of protruding objects				
Adequately lit				
Fire Protection/Warning Systems				
Fire extinguishers inspected and tagged				
Fire extinguishers unobstructed; charged; pins in place				
Fire hoses maintained and accessible				
Fire/emergency/disaster plan current & posted				
Warning/hazard signs are prominently displayed (ie. Isolation protocol, PPE needed)				
Floors				
Clean and dry; wet floor signs where needed				
Free of slip/trip hazards				
Electrical/Lighting/Cords				
Sufficient lighting for work tasks/walking				
Emergency lighting provided (working generator backup or flashlight with batteries)				
Cords in good repair				
Electrical equipment CSA/ULC approved				
Lockout tags available				
Wall and ceiling fixtures fastened securely				
Material Stacking & Storage				
Clean; good housekeeping; aisles clear				
Organized; light items on top, heavy on bottom				
Storage racks/shelves are stable				
Sprinkler heads (if in place) have a minimum of 18 inches headspace				

Date:		Location:		
NOTE: Please ensure all areas are checked by putting a check mark in one of the columns and comment as necessary.				
Category/Location	satisfactory	unsatisfactory	N/A	Comments
Material Handling				
Proper lifting/transporting/repositioning equipment is available				
Right of way kept clear (items kept to one side of hallway)				
Blind spot identified and signs posted or mirrors in place				
First Aid Kits/Station & Equipment				
First aid supplies located as required by legislation and signs posted				
Name of person certified with first aid posted				
Records kept of first aid supplies and injuries`				
Emergency supplies available (water, food, blankets)				
Eye wash station(s)/emergency showers in place within close access to high risk exposure work areas				
Workplace Hazardous Material Information System (WHMIS)				
Spill kit available where appropriate & emergency phone number posted				
Appropriate storage location and cabinet for highly flammable/explosive chemicals				
MSDS binder up to date and accessible				
WHMIS education and training provided				
Housekeeping closets are locked				
Waste Disposal				
Separate containers for oily rags, chemical/biohazard waste, compost, waste, recyclable				
Sharps containers are provided and properly maintained				
Work Stations/Areas				
Furnishings/desks/cabinets secure, not overloaded, and free from sharp edges				
Desk and file drawers kept closed when unused				
Grounds/Roadways/Parking Areas				
Sufficient lighting				
Sidewalks in good repair (uneven surfaces marked)				
Well marked crosswalk in high traffic area				

Date:		Location:		
NOTE: Please ensure all areas are checked by putting a check mark in one of the columns and comment as necessary.				
Category/Location	satisfactory	unsatisfactory	N/A	Comments
Tools/Machinery/Appliances/Equipment				
Ladders/step stools in good repair				
No metal ladder near electrical				
Guards, shields and safety devices in place and in good repair				
Safe work procedures in place				
Security				
Working alone plans in place				
Workplace violence/safe work procedures in place				
Emergency procedures in place (evacuation, fire, bomb, etc)				
Emergency numbers posted				
Miscellaneous				
OH&S bulletin board meets OH&S act standards				
Food service area – clean and sanitary				
Washrooms – clean, sanitary and stocked				
Vehicles – inspected, in good repair				
Vehicles – cargo barriers installed in vans				
NOT APPLICABLE FOR OFFICE BUILDINGS				
Patient/Client/Resident Rooms and Areas				
Bedroom uncluttered; no tripping hazards; safe to move around				
Bed brakes/locks/handles in good repair				
Bed rails in good repair				
Wheelchairs in good repair				
Inspected mechanical lifting equipment available				
Personal electrical items – CSA approved and in good repair				
Personal Protective Equipment				
PPE is available, maintained and used				
Compressed Gas				
Stored upright and secured against fall				
Musculoskeletal Injury Prevention (MSIP)				
MSIP provided				
All MSIP equipment provided and in good repair (belts, lifts, slider sheets, carts, etc)				
Inspected by:				

Appendix C: Health PEI Workplace Inspection Recording Form

Date:		Department Inspected:							
Inspected by:									
Location (within department)	Hazard(s) observed	Risk level			Repeat item?		<i>This section is to be filled in by the department managers after the inspection</i>		
		High	Med	Low	Yes	No	Action plan	Date requested	Date resolved
<u>Inspectors:</u>		Send copy to OH&S Committee Chair/Secretary Send original to Department Supervisor/Manager							

Definitions:

Hazard: Thing that has the potential to cause harm.

Risk: The chance that an existing hazard may cause harm or injury. Risk can be rated as Low, Medium or High by evaluating the Severity of any potential injury, the Frequency of exposure and Probability of occurrence.

- Low: Minor Injury (Injuries that could require first aid treatment), Infrequent Exposure, Probability of occurrence unlikely. **Low Risk Hazards require longer term action.**
- Medium: Major Injury (Injuries that could require medical treatment- more than first aid), Infrequent and Frequent Exposure, Probability of occurrence unlikely and likely. **Medium Risk Hazards require short term action.**
- High: Permanent Injury or Death, Infrequent or frequent exposure, Probability of Occurrence unlikely and likely. **High Risk Hazards require immediate action.**

Repeat Item: Hazard that was identified on last Workplace Inspection Recording Form.

Inspector's role

- Knock on doors prior to entering offices/rooms.
- Introduce inspection team to staff with in department.
- Speak with staff regarding their concerns.
- List Hazards on Workplace Inspection Recording Form.
- Assign a Risk Level to each Hazard identified
- Indicate whether this is a Repeat Item from the last inspection completed.
- Send copy of the Workplace Inspection Recording Form to OH&S Committee Chair or Secretary
- Send original to Department Manager/Supervisor.

Department Manager/Supervisor's role

- Accompany inspectors during inspection or provide a delegate.
- Review hazards and risks listed on Workplace Inspection Recording Form.
- Record Action Plan to resolve hazard. Contact appropriate department for repairs/action and advise urgency according to Risk Level. Enter dates under Date Requested.
- Return copy of Workplace Inspection Recording Form with Action Plan recorded and Date Requested completed within 30 days to OH&S Committee Secretary.
- If repairs/actions have been completed during the 30 days, enter the date under Date Resolved.

Appendix D: Critical Task Inventory Worksheet

WORKSITE: _____

DEPARTMENT: _____

JOB TITLE: _____

DATE: _____

PREPARED BY: _____

RATINGS 1 - Very Low 2 - Low 3 - Moderate 4 - High 5 - Very High

[illegible]

Appendix E: Safe Work Procedure Template

SAFE WORK PROCEDURE

Job Task:

Occupational Health & Safety Approval:

Manager Approval:

Revised:

GENERAL:

Insert a brief description & purpose for the procedure.

HAZARDS/RISKS:

Insert a list of primary hazards and risks.

TRAINING:

Identify any special training and or demonstration of tasks that is required if applicable to safety.

PERSONAL PROTECTIVE EQUIPMENT:

Specify the personal protective equipment required when doing the job. Also specify when personal protective equipment is optional by placing optional in brackets after the specified equipment.

MATERIALS REQUIRED:

Specify any materials or equipment that is required other than personal protective equipment for example MSDS, mop, pail, etc.

PROCEDURE:

1. Start with a statement outlining the task.
2. Write what to do in step by step instructions. Avoid describing what not to do.
3. Include a brief explanation of why the work must be done in this way. Procedures will more likely be followed if the reasons are understood.
4. Include the requirements for PPE. Remember that removing, substituting, or reducing the hazard is preferable to the use of PPE.
5. Consider the environment in which the work will be performed. How will this impact on the work?
6. Write the controls as actions.

REFERENCES:

Guide to Workplace Health and Safety Programs, Workers Compensation Board of PEI www.wcb.pe.ca

Appendix F: Sample Safe Work Procedure

General : To maintain beds in a clean and sanitary condition.

Hazards/Risks :

- 1) exposure to chemicals
- 2) strains/sprains
- 3) repetitive work

Training :

- 1) WHMIS
- 2) TLR Smart Training

Personal Protective Equipment :

- 1) gloves

Materials Required :

- 1) hand pail with germicide solution
- 2) clean cloth

Practice/ Procedure :

- 1) Ensure bed is in locked position or wheels are locked, elevate bed to as close to height of hips as possible.
- 2) Elevate head and foot of bed.
- 3) Standing at the side of the bed near the top pull the mattress down bending it in the center.
- 4) Holding the mattress in the bent position with one hand, use a clean cloth wet with the germicide solution in the other hand to wipe down the underside of the mattress washing only to the center of the mattress to avoid over reaching.
- 5) Wipe the bed frame to the center then replace the mattress on the bed frame.
- 6) Proceed to the bottom of the same side of the bed and pull the mattress up bending it in the center.
- 7) Holding the mattress in the bent position with one hand, use a clean cloth wet with the germicide solution in the other hand to wipe down the underside of the mattress washing only to the center of the mattress.
- 8) Wipe the bed frame to the center then replace the mattress on the bed frame.
- 9) Move to the other side of the bed and repeat the process on the other side of the mattress and bed frame.
- 10) After mattress and bed frame are wiped down proceed to wipe the headboard, footboard and side rails being careful not to over reach.
- 11) After bed has been completely washed return to non-elevated position.

Appendix G: Safe Work Guideline Template

Occupational Health & Safety Approval:

Manager Approval:

Revised:

GENERAL:

Insert a brief description & purpose for the procedure.

HAZARDS/RISKS:

Insert a list of primary hazards and risks.

SAFE WORK GUIDELINE:

Example: Please avoid using Laundry Dryer #2.

Appendix H: Safe Work Rule Template

Occupational Health & Safety Approval:

Manager Approval:

Revised:

GENERAL:

Insert a brief description & purpose for the rule.

HAZARDS/RISKS:

Insert a list of primary hazards and risks.

SAFE WORK RULE:

Example: Employees shall not climb onto counter to reach pots stored overhead.