Health and Safety Program and Policy Manual

Supported by

PENINSULA

324 – 5TH Street South
Lethbridge, Alberta
T1J 2B5

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OUR HEALTH AND SAFETY POLICY STATEMENT

Volunteer Lethbridge (the "Business") is committed to the health, safety and wellbeing of its workers and of all individuals who enter its workplace. For this policy, the terms "worker" and "workers" include any volunteers, trainees, and apprentices.

It is our policy to provide a safe work environment for all of our workers at all times by continuously promoting safe work practices, educating and training our workers regarding all applicable health and safety laws and best practices (including their specific duties and obligations under health and safety legislation). This includes regularly inspecting and evaluating our workplace in order to identify any existing or potential hazards so that they can be avoided, if not eliminated.

The duty to maintain a safe workplace is shared equally by all our workers. Supervisory personnel and members of our management are responsible for ensuring that our workers are aware of and carrying out their duties in accordance with all the health and safety policies and procedures that we have in place from time to time, including those that are set out in this policy manual. It is our goal to foster and maintain a culture of health and safety compliance within our enterprise so that workplace safety becomes an attitude that all our workers carry with them both on and off the job.

However, we also recognize that the creation, maintenance and promotion of health and safety programs, policies, procedures and protocols is an organic exercise. And as a result, our own programs, policies, procedures and protocols will need to be amended, revised, updated and modified from time to time as the Business changes and matures to ensure that our workplace is safe.

It is the policy of the Business to abide by all of the rules and provisions contained in the *Alberta Occupational Health and Safety Act, Regulations and the OHS Code* SA 2017, c O-2.1, any successor legislation, and the regulations thereto, as all of them may be amended from time to time (collectively, the "*Act, Regulations and the OHS Code*"), including all of the exemptions set out in the legislation. Consequently, the Business's health and safety programs, policies, procedures and protocols shall be interpreted and applied in accordance with the *Act, Regulations and the OHS Code*. For further clarity, should any provision of any of our health and safety programs, policies, procedures or protocols conflict with the provisions of the *Act, Regulations or the OHS Code*, then the provisions of the *Act, Regulations or the OHS Code*, and/or any other applicable legislation, as the case may be, shall prevail.

Management Sign Off	
Name:	Position:
Signature:	Date:

On an annual basis, this policy must be reviewed, dated and signed by the highest level of management at the workplace.

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ABOUT THIS POLICY MANUAL

This policy manual serves as the foundation of the Business's health and safety program. We expect that as the Business grows, evolves and matures, its health and safety program will grow, evolve and mature with it. The Business thus recognizes that maintaining a safe workplace is not a static exercise.

For this reason, the terms and provisions of this manual may need to be amended, supplemented or qualified by additional programs, policies, procedures and protocols that the Business may issue from time to time as the needs, duties and obligations of the Business change.

Similarly, should the *Act, Regulations and the OHS Code*, or any other applicable legislation, impose any requirement(s) that are not included in any of our health and safety programs, policies, procedures or protocol, or in the event that the *Act, Regulations or the OHS Code*, and any other applicable legislation, is amended so as to impose greater obligations than those set out by the Business in this manual, or in any other program, policy, procedure or protocol, then the provisions of the *Act, Regulations or the OHS Code*, and all other applicable legislation, as the case may be, will prevail.

Peninsula Employment Services Limited ***cannot and does not*** in any way represent, warrant or guarantee that your Business will be compliant with all applicable health and safety laws, or that it will be immune from enforcement proceedings, including prosecution, as a result of utilizing this policy manual. Proper compliance with health and safety laws is ultimately the responsibility of your Business.

Lastly, neither this policy or any of the material contained in this policy may be reproduced, redistributed, or resold in whole or in part without the prior written consent of Peninsula Employment Services Limited.

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ROLES AND RESPONSIBILITIES

All worksite parties are required to comply with *Alberta's OHS Act* and cooperate with a person exercising a duty imposed under the *Act.*

If a person has two (2) or more functions under the *Act* (e.g., a person could be considered both a worker and a supervisor) the person shall meet the obligations of each function.

1.1 EMPLOYERS

An Employer is defined under the *Act* as:

- A person who employs or engages one or more workers, including a person who employs or engages workers from a temporary staffing agency,
- A person designated by an employer as the employer's representative, or
- A director or officer of a corporation or a person employed by the employer who oversees the occupational health and safety of the workers employed by the corporation or employer.

Employers shall ensure, as far as it is reasonably practicable to do so:

1. The health and safety and welfare of:
    a. Workers engaged in the work of that employer,
    b. Those workers not engaged in the work of that employer but present at the work site at which that work is being carried out, and
    c. Other persons at or in the vicinity of the work site who may be affected by hazards originating from the work site;
2. That all the employer's workers are aware of their rights and duties under the *Act, Regulations and the OHS Code* and of any health and safety issues arising from the work being conducted at the work site;
3. That none of the employer's workers are subjected to or participate in harassment or violence at the work site;
4. That the employer's workers are supervised by a person who
    a. is competent; and
    b. is familiar with the sections in the *Act, Regulations and the OHS Code* that apply to the work performed at the work site;

5. That the employer consults and cooperates with the health and safety representative to exchange information on health and safety matters and to resolve health and safety concerns;

6. That health and safety concerns raised by workers, supervisors, self-employed persons and the health and safety representative are resolved in a timely manner; and

7. That on a work site where a prime contractor is required, the prime contractor is advised of the names of all the supervisors of the workers.

Furthermore, every employer shall ensure that workers are adequately trained in all matters necessary to protect their health and safety, including before the worker:

a. Begins performing a work activity;

b. Performs a new work activity, uses new equipment or performs new processes; or

c. Moves to another area or work site.

1.2 SUPERVISORY PERSONNEL

A Supervisor is defined under the *Act* as a person who has charge of a work site or authority over a worker.

Supervisors *shall**:***

1. As far as it is reasonably practicable for the supervisor to do so:

    a. Ensure that the supervisor is competent to supervise every worker under the supervisor's supervision;

    b. Take all precautions necessary to protect the health and safety of every worker under the supervisor's supervision;

    c. Ensure that a worker under the supervisor's supervision works in the manner and in accordance with the procedures and measures required by the *Act, the Regulations or the OHS Code*;

    d. Ensure that every worker under the supervisor's supervision uses all hazard controls, and properly uses or wears personal protective equipment designated or provided by the employer or required to be used or worn by the *Act, Regulations or the OHS Code*; and

    e. Ensure that none of the workers under the supervisor's supervision are subjected to or participate in harassment or violence at the work site;

f. Advise every worker under the supervisor's supervision of all known or reasonably foreseeable hazards to health and safety in the area where the worker is performing work; and

g. Report to the employer concerns about an unsafe or harmful work site act that occurs or has occurred or an unsafe or harmful work site condition that exists or has existed.

1.3 WORKERS

A Worker is defined under the *Act* as a person engaged in an occupation, including a person who performs or supplies services for no monetary compensation for an organization or employer and, for greater certainty, includes a self-employed person.

Workers shall, when engaged in an occupation:

1. Take reasonable care to protect the health and safety of the worker and of other persons at or in the vicinity of the work site while the worker is working;

2. Cooperate with the worker's supervisor or employer or any other person for the purposes of protecting the health and safety of:

    a. The worker;

    b. Other workers engaged in the work of the employer; and

    c. Other workers not engaged in the work of that employer but present at the work site at which that work is being carried out.

3. At all times, when the nature of the work requires, use all devices and wear all personal protective equipment designated and provided for the worker's protection by the worker's employer or required to be used when worn by the worker by the *Act, Regulations or the OHS Code;*

4. Refrain from causing or participating in harassment or violence; and

5. Report to the employer or supervisor a concern about an unsafe or harmful work site act that occurs or has occurred or an unsafe or harmful work site condition that exists or has existed.

1.4 SUPPLIERS

A Supplier is defined under the *Act* as a person who sells, rents, leases, erects, installs or provides any equipment or who sells or otherwise provides any harmful substance or explosive to be used by a worker in respect of any occupation, project or work site.

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Every Supplier shall, as far as it is reasonably practicable for the supplier to do so:

1. Ensure that any equipment that the supplier supplies are in safe operating condition;
2. Ensure that any harmful substance or explosive the supplier supplies are safe to use when used in accordance with the manufacturer's specifications;
3. If the supplier has responsibility under an agreement to maintain equipment, ensure that the equipment is maintained in a safe condition, in accordance with the manufacturer's specifications, if any, and in compliance with the *Act, Regulations and the OHS Code*;
4. Provide a notice to all of the employers supplied by the supplier with equipment, or to the purchasers or leases of the equipment when the supplier becomes aware or ought reasonably to be aware that the equipment that was supplied or is about to be supplied does not comply with a standard prescribed under the *Act, Regulations and the OHS Code*;
5. Provide a notice to all of the employers supplied by the supplier with a harmful substance or explosive when the supplier becomes aware or ought reasonably to be aware that the harmful substance or explosive that was supplied or is about to be supplied does not comply with a standard prescribed under the *Act, Regulations or the OHS Code*; and
6. Subject to the foregoing, every supplier shall ensure that any equipment, harmful substance or explosive that the supplier supplies comply with the *Act, Regulations or the OHS Code.*

1.5 CONTRACTORS

A Contractor is defined under the *Act* as a person, partnership or group of persons who, through a contract, an agreement or ownership, directs the activities of one or more employers or self-employed persons involved in work at a work site.

Every Contractor shall ensure, as far as is reasonably practicable to do so that:

1. Every work site where an employer, employer's worker or self-employed person works pursuant to a contract with the contractor; and
2. Every work process or procedure performed at a work site by an employer, employer's worker or self-employed person pursuant to a contract with the contractor that is under the control of the contractor does not create a risk to the health and safety of any person.

Furthermore, every Contractor shall, if the Contractor is on a work site that has a prime contractor, advise the prime contractor of the name of every employer or self-employed person with whom the contractor directs the work activities

1.6 Prime Contractors

Every construction and oil and gas work site or class of work sites designated by a Director of the *Act* must have a prime contractor if there are two (2) or more employers or self-employed persons, or one or more employers and one or more self-employed persons involved in work at the work site.

The person in control of the work site shall designate in writing a person as the prime contractor of the work site. The name of the Prime Contractor must be posted in a conspicuous place at the work site. If the person in control of the work site fails to designate a person as the Prime Contractor, the person in control of the work site is deemed to be the Prime Contractor.

If a requirement in the *Act* imposes a duty on an employer or a self-employed person with respect to equipment, work site infrastructure or an excavation and the equipment or infrastructure is designed, constructed, erected or installed, or the excavation is conducted by or on behalf of a Prime Contractor, the prime contractor shall comply with the requirement as if the requirement were directly imposed on the Prime Contractor.

The Prime Contractor shall:

1. Establish, as far as it is reasonably practicable to do so, a system or process that will ensure compliance with the *Act, Regulations or the OHS Code* in respect of the work site;
2. Coordinate, organize and oversee the performance of all work at the work site to ensure, as far as it is reasonably practicable to do so, that no person is exposed to hazards arising out of, or in connection with, activities at the work site;
3. Conduct the prime contractor’s own activities in such a way as to ensure, as far as it is reasonably practicable to do so, that no person is exposed to hazards arising out of, or in connection with, activities at the work site;
4. Consult and cooperate with the health and safety representative to attempt to resolve any health and safety issues; and
5. Coordinate the health and safety programs of employers and self-employed persons on the work site, if two (2) or more employers or self-employed persons

or one or more employers and one or more self-employed persons on the work site have a health and safety program.

1.7 Self-Employed Persons

A Self-Employed Person is defined under the *Act* as a person who is engaged in an occupation but is not in the service of an employer for that occupation.

Every Self-Employed Person shall:

1. Conduct the self-employed person's work to ensure that the self-employed person or any other person is not exposed to hazards from activities at the work site,

2. When working on a project that has a prime contractor, advise the prime contractor that the self-employed person is working on the project,

3. If a requirement of the *Act, Regulations or the OHS Code* imposes a duty on an employer or a worker, comply with the requirement as if the requirement were directly imposed on the self-employed person, with any necessary modifications,

4. Report, to the extent that it is reasonably practicable to do so, to all affected employers and self-employed persons at the work site a concern about an unsafe or harmful work site act that occurs or has occurred or an unsafe or harmful work site condition that exists or has existed.

1.8 Owners

An Owner is defined in the *Act* as the person who is registered under *the Land Titles Act* as the owner of the land on which work is being carried out or may be carried out, or the person who enters into an agreement with the owner to be responsible for meeting the owner's obligations under the *Act, Regulations and the OHS Code.* This does not include a person who occupies land or premises used as a private residence unless a business, trade or profession is carried on in that premises.

Every owner shall ensure, as far as it is reasonably practicable to do so, that the land, infrastructure and any building or premises on the land that is under the owner's control is provided and maintained in a manner that does not endanger the health and safety of workers or any other person.

1.9 Visitors

Every person who visits a workplace of the Business *must*:

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1. Follow any sign in and sign out policy or protocol;
2. Not smoke anywhere in the workplace;
3. Wear appropriate safety equipment, if necessary;
4. Comply at all times with the Business's health and safety policies and protocols;
5. Refrain from harassing any of the Business's workers, supervisors, managers or patrons;
6. Report any unsafe or potentially unsafe condition(s) to any worker or member of management;
7. Not enter areas of the workplace that are normally restricted to workers; and
8. Workers, supervisors and members of management shall be jointly responsible for monitoring the conduct of visitors to the workplace.

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EDUCATION AND TRAINING POLICY

1.0 POLICY STATEMENT

The Business is committed to complying with all of the provisions contained in the *Alberta Occupational Health and Safety Act, Regulations and Code* SA 2017, c O-2.1, any successor legislation, and the regulations thereto, as all of them may be amended from time to time (collectively, the "*Act, Regulations and the OHS Code*") and in particular, Section 3 of *the OHS Act* and Section 15 of the OHS Regulations as they pertain to the education and training of workers in ensuring their health and safety at the workplace.

1.1 GENERAL TRAINING

The purpose of safety training is to inform employees of their responsibility in conforming to legislation, safety rules and the necessary elements of controlling hazards in the workplace.

All workers of the Business shall be provided with adequate training that complies with applicable occupational health and safety laws.

All supervisors of the Business shall be provided with adequate training that complies with applicable occupational health and safety laws.

1.1.1 Additional Training and Certified Training

The Business will provide any additional training that is mandated by law and that is required for a worker to carry out his or her duties safely, including (if applicable), but not limited to; certified training for health and safety representative and WHMIS (Workplace Hazardous Materials Information System) training[1].

1.1.2 Training Records

All worker training activities will be documented by the Business, including the completion and retention of a list of all workers who have received health and safety training, the nature of the training received (i.e., training program type and the training completion date).

The information will be listed in the **Training/Certification Record Form** found at the end of this Education and Training policy.

[1] Contact Peninsula's health and safety advice line if you require assistance arranging any necessary worker training.

1.2 Worker Orientation and Induction

Every new worker will be required to undergo adequate health and safety training and orientation prior to commencing work. It's the responsibility of the Business to determine the appropriate training required by a new employee.

1.3 Posting Health and Safety Literature in the Workplace

The following documents ***shall*** be posted in a conspicuous location within the workplace:

- A complete and up-to-date copy of this manual;
- Any orders from *Alberta OHS* made under *the Act* to the employer that is relevant to the work site;
- Alberta WCB "Hurt at Work" Poster;
- The name and contact information of the health and safety representative;
- An emergency contact list.

The following documents ***shall*** be made readily available for workers within the workplace:

1. Current paper or downloaded or stored electronic copies of the *Act, the regulations and the Alberta OHS Code;*
2. An up-to-date copy of the Business's workplace violence and harassment policy and prevention plans
3. Information regarding hazardous materials in the workplace, such as Safety Data Sheets (SDS's), as required by law

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HEALTH AND SAFETY REPRESENTATIVE POLICY (HSR)

1.0 POLICY STATEMENT

The Business is committed to complying with all of the provisions contained in the *Alberta Occupational Health and Safety Act, Regulations and the OHS Code* SA 2017, c O-2.1, any successor legislation, and the regulations thereto, as they are amended from time to time (collectively, the "*Act, Regulations and the OHS Code*"), and in particular, Section 17 of the *OHS Act* and Part 13 of the *OHS Code* (Joint Work Site Health & Safety Committee and Health & Safety Representative). This policy is intended to supplement the Business's Health and Safety Program and Policies manual.

2.0 GENERAL

When work is expected to last 90 days or more, the Business shall:

- Designate a Health and Safety Representative (HSR) if the employer has 5 to 19 full or part-time workers in total.

3.0 DEFINITIONS

For the purposes of this policy, the Business adopts the following definitions contained in the *Act, Regulation and the Alberta OHS Code*. More specifically:

"Regularly employed"	A worker who holds a position within the Business's workplace for more than three (3) months, or a worker who is expected to hold a position within the Business's workplace for more than three (3) months.
"Worker"	A person engaged in an occupation, including a person who performs or supplies services for which no monetary compensation for an organization or employer and, for greater certainty, includes a self-employed person.
"Workplace"	A location where a worker is or is likely to be engaged in any occupation and includes any vehicles or mobile equipment used by a worker in an occupation.

4.0 SELECTING THE HSR

An HSR will be appointed by those workers within the Business's workplace who do not exercise managerial functions and who will be represented by the HSR. The HSR shall be appointed according to the following process:

1. The Business shall notify its workers in writing that an HSR must be appointed by posting and distributing a copy of the **Health and Safety Representative Selection Form** found at the end of this HSR Policy. The posted form shall include the date on which the worker election shall close, and the worker votes will be counted.

2. Every worker who does not exercise managerial functions must complete the **Health and Safety Representative Selection Form** by writing down the name of the person the worker wishes to elect as the HSR (the person nominated also must not exercise managerial functions) and submit the completed form to the Business for counting.

3. A worker may nominate him or herself or nominate another worker for the HSR role provided that they are eligible – i.e., the person must not exercise managerial functions.

4. A worker cannot nominate a person who has ceased to be employed at the Business's workplace. For the purposes of this section, a worker "ceases to be employed" as of the date he or she ceases to perform services for the Business for any reason whatsoever ("Date of Termination") – i.e., whether voluntarily or involuntarily and regardless of whether the termination is with or without cause. For example, if a worker is dismissed by the Company on a without cause basis, the Date of Termination shall not be the last date of the worker's notice period as defined in his or her contract of employment or at common law, but rather, the last day that the worker performs services for the Business.

5. The nominee with the highest number of votes shall be installed as the Business's HSR, provided that he or she is eligible. If only one (1) worker volunteers, then they will nevertheless need to be formally elected as the HSR by the remaining eligible workers via a vote.

6. In the event of a tie, the Business shall first ensure that all eligible workers have submitted a ballot. If any eligible workers have not participated, then they will be asked to do so.

7. Once all eligible workers have been accounted for and afforded an opportunity to vote, a recount of all the submitted ballots shall be completed. If a winner is not determined, this process shall be repeated as often and as promptly as possible until an HSR is properly elected and appointed in accordance with this policy and Alberta OHS legislation.

8. In the event that a non-eligible worker is elected as the HSR, the Business shall notify its workers that the candidate is ineligible; inform its workers of the eligibility requirements for a nominee, and then repeat the election process until an eligible worker is properly elected and appointed as the HSR in accordance with this policy and Alberta OHS legislation.

Following the completion of the election process, the name, title and contact information of the elected HSR shall be listed in the **Health and Safety Representative Posting Form** found at the end of this HSR Policy. The completed form shall then be posted in a conspicuous location in the workplace.

5.0 TRAINING

The Business shall annually permit the Health and Safety Representatives (HSR) to take the greater of 16 hours or the number of hours they would normally work during two shifts, to attend work site health and training programs, seminars or courses of instruction.

The HSR is required to complete a mandatory six (6) to eight (8) hours course that is provided by a designated training agency. The hours spent completing this training can count towards the HSR's annual health and safety training hours (the greater of 16 hours or two full shifts).

To obtain a list of the designated training agencies in your area, please contact Peninsula's Advice Line.

6.0 DUTIES AND RESPONSIBILITIES OF THE HSR

The HSR's duties and responsibilities are specifically set out in *Alberta OHS* legislation and explained as follows:

- Receive and address concerns and complaints about the health and safety of workers;
- Participate in the identification of hazards to workers or other persons arising out of or in connection with activities at the work site;
- Develop and promote measures to protect the health and safety of persons at the work site and checking the effectiveness of the measures;
- Cooperate with Alberta OHS officer(s) exercising their duties;
- Develop and promote programs for education and information concerning health and safety;
- Make recommendations to the employer, prime contractor or owner respecting the health and safety of workers; and

- Participate in investigations of serious injuries and incidents at the work site, maintain records in connection with concerns and complaints, and attend to other matters relating to the duties of the HSR.

6.1 Conduct Regular Workplace Inspections

While no specific time period is stated in the *OHS Act,* inspection intervals should be based on factors such as the type of work site, the work performed, the hazards encountered, size of the work site, the number of workers, and the nature of the work being done.

Inspections shall be carried out according to a schedule agreed upon by the HSR and the Business. The schedule shall be listed in the **HSR Workplace Inspection Schedule Form** found at the end of this HSR Policy. The Business shall provide the HSR with any information that he or she requires for the purposes of carrying out workplace Inspections.

In completing his or her scheduled inspections, the HSR shall complete the **Workplace Inspection Details Form** found at the end of this HSR Policy and submit the completed Form to the Business. The HSR shall inform the Business of any situations that may be a source of danger or hazard to workers by listing his or her concerns in the completed **Workplace Inspection Details Form**. The Business shall consider such information within a reasonable period of time.

6.2 Participate in Investigations of Serious Injuries and Incidents

The HSR must be involved in the investigation of serious incidents, as well as any other incident “that injures a person, and results in the person requiring medical treatment, or that had the potential to cause a serious incident.”

A written report must be prepared for each incident investigation. The HSR must be provided with a copy of these reports once the investigation is complete.

6.3 Participate in Work Refusal Investigations

Where the Business is required to investigate a worker’s refusal to perform work on the basis that he or she believes it is unsafe, the HSR must be present for the investigation and shall attend without delay.

The following provides a summary of the steps that involve the HSR:

- If a worker believes that the assigned work is dangerous, the refusal and the reason for the refusal is promptly reported to the employer or supervisor;

- If the dangerous condition is not remedied immediately, the condition is inspected by the employer, the worker, and the HSR;
- On completion of the inspection, the Business will prepare a written report of the refusal, the inspection, and action is taken; and
- A copy of the report is provided to the worker and the HSR

7.0 POWERS OF THE HSR

The HSR has numerous information gathering and investigative powers under the *Act, Regulation and OHS Code*. More specifically, the HSR has the power to:

1. Identify situations that may be a source of danger or hazard to workers and to make recommendations to the Business or report his or her findings thereon directly to the Business ***and*** directly to the Business's workers;

2. Obtain information from the Business concerning the conducting or taking of tests of any equipment, machine, device, article, thing, material or biological, chemical or physical agent in or about a workplace for the purposes of occupational health and safety;

3. Be consulted about, and be present at the beginning of testing referred to in paragraph two (2) above that is conducted in or about the Business's workplace if the HSR believes that his or her presence is required to ensure that sufficient testing procedures are used to ensure that the test results are valid;

4. Be immediately notified of any workplace fatalities or serious injuries in accordance with the *OHS Act* 40(6);

5. Be notified of any occupational illnesses that are reported to the Business by a worker or a former worker;

6. Obtain information from the Business regarding the identification of potential or existing hazards of materials, processes or equipment and information regarding health and safety experience and work practices and standards in similar or other industries of which the Business has knowledge; and

7. May call a special meeting with the business to deal with urgent concerns at the work site.

8.0 PROCEDURE REGARDING HSR RECOMMENDATIONS

The HSR shall submit any recommendations or reports to the Business using the HSR **Recommendation/Report Form** found at the end of this HSR Policy. The completed form must include a detailed explanation of the HSR's recommendation(s) or report(s), the reason(s) for the recommendation(s) or report(s) and a summary of the relevant facts underlying the HSR's recommendation(s) or report(s).

Upon receiving a completed **HSR Recommendation/Report Form** from the HSR, the Business shall immediately date stamp the form.

1) If the matter can be resolved by the business **within 30 days**, the business shall do so and inform the HSR.
2) If the matter cannot be resolved by the business within 30 days, the business shall respond in writing, stating how the concern will be addressed and when the concern will be addressed, including:
    - A timetable for implementing changes to address the matter; and
    - Any interim control measures that the business will implement to address the matter.
3) If the business disagrees with any of the recommendations or does not accept or believe there are any health and safety concerns, the business shall give reasons why the business disagrees with any recommendations or does not accept or believe there are any health and safety concerns.
4) If a consensus cannot be reached, then Alberta OHS should be contacted to resolve the issue.

The Business's response must be delivered using the **30-Day Response Form** found at the end of this document.

9.0 ENTITLEMENT TO TIME FROM WORK AND PAY

The HSR is entitled to take as much time from work as necessary to carry out his or her duties in accordance with this policy and OHS legislation, including completing any necessary training. The time so spent by the HSR shall be deemed to be work time for which the HSR must be paid at his or her regular rate, subject to applicable employment standards legislation.

10.0 PROCEDURE WHEN THE HSR IS ABSENT FROM WORK

In the event that the incumbent HSR is absent from work such that he or she is unable to carry out their duties in accordance with this policy and OHS legislation (e.g., due to an illness, personal emergency, a leave of absence, etc.), then the Business shall elect an interim replacement HSR by following the election procedure set out in section 4.0 above (Selecting the HSR). The interim replacement HSR shall assume all of the duties, powers and responsibilities set out in this policy until the incumbent HSR returns to the workplace. However, if the incumbent HSR does not return to work, then the interim HSR shall replace the incumbent HSR. This process shall be repeated as necessary.

11.0 PROCEDURE WHEN THE HSR'S EMPLOYMENT ENDS

If the incumbent HSR ceases to be employed for any reason whatsoever – i.e., whether voluntarily or involuntarily and regardless of whether the termination is with or without cause – then the Business shall elect a new HSR by following the election procedure set out in section 4.0 above (Selecting the HSR). This process shall be repeated as necessary.

For the purposes of this section, the HSR "ceases to be employed" as of the date he or she ceases to perform services for the Business for any reason whatsoever ("Date of Termination"). – i.e., whether voluntarily or involuntarily and regardless of whether the termination is with or without cause. For example, if a worker is dismissed by the Company on a without cause basis, the Date of Termination shall not be the last date of the worker's notice period as defined in his or her contract of employment or at common law, but rather, the last day that the HSR performs services for the Business.

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WORKPLACE INSPECTION AND HOUSEKEEPING POLICY

1.0 POLICY STATEMENT

The Business is committed to complying with all of the provisions contained in the *Alberta Occupational Health and Safety Act, Regulations and the OHS Code,* in particular Section 185 of the *OHS Code* and Section 19 (g) of the *OHS Act* by maintaining a tidy workplace and conducting work site inspections at regular intervals, to ensure a workplace that's safe and free of hazards that could contribute to workplace incidents or injuries.

2.0 WORKPLACE INSPECTIONS

In keeping with the Business's commitment to maintaining a safe workplace, the Business will ensure that regular workplace inspections are completed. A regular inspection schedule will be set by the Business, and where applicable, in conjunction with the Business's health and safety representative.

The Business's regular workplace inspection schedule will be set out in a completed **Workplace Inspection Schedule Form** found at the end of this Workplace Inspection and Housekeeping Policy. A completed and up-to-date **Workplace Inspection Schedule Form** will be posted in a conspicuous location in the workplace.

Following ***every*** workplace inspection, the worker conducting the inspection ***shall*** sign and submit to management a properly completed **Workplace Inspection Details Form** found at the end of this Workplace Inspection and Housekeeping Policy.

2.1 INSPECTION AND MAINTENANCE

2.1.1 Work Equipment and Safety Equipment

All work and safety equipment will be identified and inventoried. In addition, the Business will, subject to any amendments to or modifications of this policy as may be required from time to time, follow the inspection routine set out in Table 1 below for all work tools, equipment and safety equipment, including:

- Motor vehicles and similar machinery (if any);
- Personal protective equipment, such as safety glasses and safety boots (if any);
- Fire extinguishers and first aid kits; and
- Fall protection accessories, such as ropes, harnesses and belts, and rescue equipment (if any).

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Table 1 – Inspection Routine for Equipment

Items to be visually inspected*	Pre-use Visual	Daily	Weekly	Monthly	Annually
Fire extinguishers				☐	☐
Fire alarms					☐
Fall protection equipment (if any)	☐	☐	☐	☐	☐
First Aid kits and accessories				☐	☐

*All workers must always follow manufacturers' specifications and maintenance and inspection protocols required by law for all vehicles, machinery, tools, equipment and fire safety equipment (i.e., the *Alberta Fire Code*, etc.)

3.0 HOUSEKEEPING

The Business is committed to maintaining a tidy workplace. As such, the Business shall ensure that its workplace is cleaned regularly. The Business will either assign a worker internally to perform regular housekeeping duties, or alternatively, hire a third-party to perform cleaning services. The Business shall set a regular cleaning schedule. The schedule shall be set out in the **Workplace Housekeeping Schedule Form** found at the end of this Workplace Inspection and Housekeeping Policy. A completed and up-to-date Form will be posted in a conspicuous location in the workplace. The person(s) who complete(s) the scheduled housekeeping work ***shall*** submit a completed and signed **Workplace Housekeeping Completion Form** to management.

3.1 OFFICE SAFETY

When working in an office environment, workers are required to maintain good housekeeping habits including, but not limited to:

- Refraining from leaving cabinet and desk drawers and doors open when they are not being used;
- When accessing filing cabinets, only open one drawer at a time. Opening multiple drawers can give rise to a serious tipping or tripping hazard;

- No leaning back in or tilting chairs;
- No standing on tables, chairs, desks, cabinets or other elevated objects to obtain items that are out of reach;
- Refrain from using a ladder or other elevation device when alone, or using a ladder or device that is improperly positioned, broken, tilted, unsecure or unstable;
- No leaving office supplies, boxes, bags or any other storage equipment or items on the floor or in any other area in such a way as to pose a tripping hazard, or in a manner that would result in an obstruction during an emergency;
- No placing power cords, phone and internet cables and similar objects in any location or in any manner that would create a tripping hazard, or that would result in an obstruction during an emergency; and
- Immediately reporting any defects, or potential defects, in any flooring, door mechanisms or other devices that if left uncorrected could pose a safety risk to other workers.

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WORKING ALONE POLICY

1.0 POLICY STATEMENT

The Business is committed to complying with all of the provisions contained in *Alberta Occupational Health and Safety Act, Regulations and the OHS Code* SA 2017, c O-2.1, any successor legislation, and the regulations thereto, as all of them may be amended from time to time (collectively, the "*Act, Regulations and the OHS Code*"), in particular Part 28 of the *OHS Code,* Working Alone. This policy is intended to supplement the Business's Health and Safety Program and Policies. The Business is committed to putting processes in place to ensure the safety of any of its worker(s) who may be required to work alone and in isolation.

2.0 APPLICATION

This Working Alone Policy will apply whenever:

a) A worker of the Business is working alone at a work site; and
b) Assistance is not readily available if there is an emergency or the worker is injured or ill.

3.0 DEFINITION

"Buddy System"	A system of organizing employees into work groups in such a manner that each employee of the work group is designated to observe the activities of at least one other employee in the work group. This is the preferred method to protect employees working in isolated locations.
"Working Alone"	A situation where a worker is in the workplace and assistance is not readily available in the event of an injury, illness or emergency.
"Effective Means of Communication"	Two-way radio, landline telephone or cell phones, air horns, or other electronic communication devices.

3.1 Working Alone Risk and Hazard Assessments

Whenever a worker is required to work alone, the Business shall first:

1. Conduct an assessment that is reasonable in the circumstances to identify any existing or potential risks or hazards arising from the conditions and circumstances of working alone, considering factors such as, but not limited to:

    - The amount of time that the worker can expect to be working alone;
    - The physical and geographic location of the work (e.g., will the worker be in an isolated area with limited access to communication or food and water? Will the worker be working outside? Will the worker be working in a position of visibility?);
    - Whether the worker might require assistance at any point while working alone (e.g., using a ladder, handling dangerous substances or lifting heavy materials);
    - The time(s) of day during which the worker will be working alone;
    - The modes of communication that will be available to the worker while he or she is working alone;
    - Whether the workplace has functioning security equipment, such as security cameras and alarm systems;
    - Whether emergency response personnel, such as the police and paramedics, can easily access the workplace;
    - The transportation needs of the worker (e.g., will the worker be driving or require access to public transit, and if so, will it be available to the worker?);
    - Whether the worker will have access to first aid equipment in the workplace;
    - Whether the worker will be working with large amounts of money or valuables (i.e., is the worker at risk of being robbed?);
    - Whether the worker is competent to perform the work alone (e.g., has the worker received appropriate training, including training and instruction regarding working alone, etc.); and
    - Whether the worker will have access to any necessary safety equipment, and if so, whether the worker has been properly trained on how to use the equipment.

2. Establish an effective means of communication (e.g., telephone, radio, intercom, etc.) between the worker and a person or persons capable of providing immediate assistance to the worker in the event of a hazardous situation or emergency;

3. If an effective means of communication is not possible, establish a system for monitoring and supporting the worker (e.g., a “buddy system”, regular visits to the worker, or the worker contacts the Business at regularly designated intervals) as appropriate having regard for the conditions and circumstances of the working alone; and

4. Take all reasonable measures to ensure that all chosen communications systems (e.g., telephones, cell phones, etc.) are available and in proper working order.

3.2 Working Alone Safety Measures

To ensure the ongoing safety of workers who are working alone, or who might find themselves working alone, the Business shall, in addition to the foregoing:

1. Take all reasonable steps to control, and if possible, eliminate any risks or hazards identified during the risk assessment process, as set out in subsection 3.1 (Working Alone Risk and Hazard Assessments) above, including establishing a procedure for monitoring a worker who will be working alone (such as a check-in and check-out procedure), requiring the worker to report to a designated contact person in regular intervals by way of an audio or visual device;
2. Provide worker training and education to all workers to limit the dangers of working alone;
3. Investigate any incidents, accidents or near-misses (including incidents of workplace violence and harassment, whether formally reported or not) that occur while a worker is working alone and then take all reasonable measures to prevent a reoccurrence;
4. If necessary, report any incidents, accidents or near-misses to the appropriate authorities (e.g., the police);
5. If possible, schedule higher risk work to be done either during regular working hours or during periods when a worker will not be working alone, or where there is a greater likelihood of a worker not having to work alone;
6. If possible, avoid scheduling hazardous or high-risk work to be performed while a worker is or can be expected to be working alone;
7. Take all reasonable measures to ensure that a worker who is working alone has immediate and unimpeded access to emergency assistance (e.g., from the police or from paramedics);
8. Develop and implement an action plan for workplace incidents or emergencies that occur while a worker is working alone; and
9. Establish a travel plan for the worker to get to and from the workplace, including ensuring that the worker’s vehicle is in working order if he or she intends to drive (if applicable).

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FIRST AID POLICY

1.0 POLICY STATEMENT

The Business is committed to complying with all of the provisions contained in the *Alberta Occupational Health and Safety Act, the Regulations and OHS Code* SA 2017, c 0-2.1, thereto, and in particular, Part 11 (First Aid) and Schedule 2 of the *Alberta OHS Code*. This policy is intended to supplement the Business's Health and Safety Program and Policies manual.

2.0 FIRST AID REQUIREMENT

As per the requirements in Part 11 of the *Alberta OHS Code*, employers must have adequate first aid equipment, first aid facilities and trained first aid personnel at all workplaces.

2.1 First Aiders and First Aid Supplies

The Business shall at all times maintain the minimum number first aiders and first aid supplies containing the following items based on the applicable worker count, distance from emergency services and work hazard level classification (low, medium, high):

2.1.1 First aid requirements for low hazard work

Number of workers at work site per shift	Close to work site (up to 20 minutes)	Distant work site (20 – 40 minutes)	Isolated work site (more than 40 minutes)
1	**Type P First Aid Kit**	**Type P First Aid Kit**	**Type P First Aid Kit**
2 - 9	• No. 1 First Aid Kit	• 1 Emergency First Aider • No. 2 First Aid Kit	• 1 Standard First Aider • No. 2 First Aid Kit
10 - 49	• 1 Emergency First Aider • No. 1 First Aid Kit	• 1 Emergency First Aider • No. 2 First Aid Kit	• 1 Standard First Aider • No. 2 First Aid Kit

Number of workers at work site per shift	Close to work site (up to 20 minutes)	Distant work site (20 – 40 minutes)	Isolated work site (more than 40 minutes)
50 – 99	• 1 Emergency First Aider • 1 Standard First Aider • No. 2 First Aid Kit	• 1 Emergency First Aider • 1 Standard First Aider • No. 2 First Aid Kit	• 2 Standard First Aiders • No. 2 First Aid Kit

The Business's first aid equipment and supplies shall have the following:

1. Located at or near the work site they are intended to serve.
2. Available and accessible during all working hours.
3. Maintained in a clean, dry and serviceable condition.
4. Contained in a material that protects the contents from the environment.
5. Clearly identified as first aid equipment and supplies.
6. Posting signage at conspicuous places at the work site indicating the location of first aid services, equipment and supplies, if posting signage is not practicable each worker must know the location of first aid services, equipment and supplies.
7. Emergency communication system in place for workers to summon first aid services.
8. A notice board displaying:
    a. The Alberta Workers' Compensation Board's "Hurt at Work" poster.

2.2 First Aid Personnel

The Business shall ensure that first aiders are:

1. Trained and certificated in first aid; and
2. Responsible for assisting the injured worker and completing the first aid reports.

If a worker needs first aid treatment, the **First Aid Reporting Form**, found at the end of this First Aid Policy, must be filled out by the first aider.

2.3 EMERGENCY TRANSPORTATION

The Business shall ensure that arrangements are in place to transport injured or ill workers from the work site to the nearest health care facility.

If the worker is acutely ill or injured or needs to be accompanied during transport to a health care facility, the Business shall ensure that the worker is accompanied by at least one first aider, in addition to the operator of the transportation.

2.4 RECORD ACCESS

The Business shall ensure to designate a person to keep the first aid records and to respect worker privacy as the *OHS Code* limits access to first aid records. The first aid records must be kept private, and that no person other than the worker has access to their first aid records.

The only exceptions to the privacy and security requirements are:

- An Alberta OHS Officer requires the production of the first aid records for purposes of inspection;
- The first aid records do not identify the worker; or
- The worker has given written consent to disclose his or her first aid records.

2.5 FIRST AID INSPECTIONS

The Business shall ensure that its first aid boxes and their contents are checked regularly, but no less than four (4) times a year, to ensure that they are in good working order. Inspections shall be completed using the inspection forms found under **Appendixes 2 and 3** at the end of this First Aid Policy.

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WORKPLACE VIOLENCE PREVENTION POLICY STATEMENT

1.0 ORGANIZATIONAL COMMITMENT

The Business is committed to providing a working environment that is safe, secure, and free from threats, intimidation and violence. The Business will not tolerate violent behaviour and will take all reasonable and practical measures to prevent, eliminate or, if that is not reasonably practicable, to control the hazard of violence at its work site(s).

This Violence Prevention Policy applies to all the Business' workers, including full-time, temporary and contract staff, as well as to any volunteers, students, interns and apprentices. This Policy applies to every level of our organization and to every aspect of the workplace environment, including but not limited to visitors, clients and delivery personnel as well as work-related events that occur outside of the physical work site, such as during business trips and staff events, and where applicable, to digital work environments.

There is a Workplace Violence Prevention Plan that implements this Policy. The Plan includes measures and procedures for workers to obtain immediate assistance in the event of violence at the work site, reporting and investigation of complaints measures to prevent future occurrences.

The Business will not disclose the circumstances related to an incident of violence, the names of the complaint, the person alleged to have committed the violence, and any witnesses, except:

- Where necessary to investigate the incident or take corrective action or to inform the parties involved in the incident of the results of the investigation and any corrective action to be taken to address the incident;
- Where necessary to inform workers of a specific or general threat of violence or potential violence; or
- As required by law.

When informing workers of a specific or general threat of violence or potential for violence at the work site, only minimal amount of personal information will be disclosed. Every worker is responsible for taking measures to prevent workplace violence and must promptly report any acts of violence, experienced or observed, that threaten, or are perceived to threaten, a safe working environment to their immediate manager, supervisor, the Human Resources or the third party, designated by the company. Management will investigate all incidents and complaints of workplace violence in a fair and timely manner and take appropriate and necessary corrective action to address the complaints.

This Violence Prevention Policy is not intended to discourage a worker from exercising his or her rights pursuant to any other law.

On an annual basis, this Policy statement must be reviewed, dated and signed by the highest level of management at the workplace.

Name: _______________ Signature: _______________ Date: _____________

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WORKPLACE VIOLENCE PREVENTION PLAN AND POLICY

1.0 POLICY STATEMENT

The Business is committed to complying with all of the provisions contained in the Alberta Occupational Health and Safety Act, the Regulations and OHS Code, SA 2017, c 0-2.1, any successor legislation, and the regulations thereto, as they are amended from time to time (collectively, the "Act, Regulations and the OHS Code"), and in particular, Part 27 of the *Alberta Occupational Health and Safety Code* (Violence and Harassment). In addition, the Business is committed to providing a working environment that is safe, secure, and free from threats, intimidation and violence. We maintain a zero-tolerance approach to workplace violence. As such, the Business will not tolerate violent behaviour and will take all reasonable and practical measures to prevent workplace violence and to protect workers from acts of violence.

This Workplace Violence Prevention Plan supplements the Business's policy entitled Workplace Violence Prevention Policy and outlines the responsibilities associated with this program**.** Further to consultation with the Health and Safety Representative (HSR), the Violence Prevention Plan will be reviewed every three (3) years or more. This is often completed if there is an incident of harassment or violence or if the health and safety committee or representative requests a review.

1.1 OBJECTIVES

The objectives of this Workplace Violence Prevention Plan are to:

1. Take every precaution reasonable in the circumstances to prevent workplace violence;
2. Ensure that no worker is exposed to violence in the workplace; and
3. Provide guidelines on:
    - How to conduct a Workplace Violence Risk Assessment;
    - How to develop and implement preventative measures to control identified risks that are likely to expose a worker to physical injury;
    - How to summon immediate assistance;
    - How to report incidents of violence;
    - How an investigation into allegations of workplace violence will be conducted;

- How investigation findings will be communicated to the victim(s) or the alleged offender(s); and
- How to address matters related to domestic violence at the workplace.

4. Ensure that appropriate disciplinary measures are taken against any worker found to have committed violence against another worker up to and including immediate dismissal for cause.

2.0 DEFINITIONS

For the purposes of this Policy, the following terms are defined:

"Complainant"	Complainant refers to the person who is making a complaint.
"Domestic Violence"	Domestic violence is a pattern of behaviour used by one person to gain power and control over another person with whom he or she has, or has had, an intimate relationship with. This pattern of behaviour may include, but is not limited to, physical violence, sexual, emotional, and psychological intimidation, verbal abuse, stalking, and using electronic devices to harass and control.
"Respondent"	Refers to the person against whom a complaint has been filed.
"Reporting Contact"	The person to whom a worker can report any incidents of workplace violence, experienced or observed.
"Sexual Violence"	Any sexual act, attempt to obtain a sexual act, or other act directed against a worker's sexuality using coercion, by any person regardless of their relationship to the victim, in a workplace or work-related setting.
"Third-Party Designate"	An individual or an organization designated by the Business to whom the worker(s) can report incidents or allegations of workplace violence committed by the employer (e.g. the business owner, senior executives, directors, managers or supervisors).

"Work Site"	A location where a worker is, or is likely to be, engaged in any occupation and includes any vehicle or mobile equipment used by a worker in an occupation.
"Violence"	Violence, whether at a work site or work-related, means the threatened, attempted or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm, and includes domestic or sexual violence;

2.1 EXAMPLES OF WORKPLACE VIOLENCE

Examples of workplace violence include, but are not limited to:

- Expressions of intent to inflict harm;
- Threatening activity, such as waving a fist;
- Using, or attempting to use, physical force against another person;
- Shoving;
- Pushing;
- Hitting; and
- Verbal abuse.

3.0 ROLES AND RESPONSIBILITIES

3.1 MANAGEMENT RESPONSIBILITIES

Under the Workplace Violence Prevention Plan and Policy, the Business's owner(s), managers and supervisors have the following responsibilities:

- Ensure all measures and procedures outlined in the workplace violence policy and its supporting program are followed by workers and that workers have the information they need to protect themselves against workplace violence;
- Promote a violence-free workplace by enforcing this workplace violence policy and its supporting program;
- Develop workplace arrangements that minimize workplace violence;

- Instruct and inform all workers as appropriate on the contents of this workplace violence policy and its supporting program;
- Conduct regular assessments of the risk of violence in the workplace or as often as necessary;
- Warn workers about the risk of violence in the workplace;
- Address and resolve incidents involving workers;
- Take measures in certain circumstances to protect workers from domestic violence occurring in the workplace;
- Ensure that the Workplace Violence Prevention Policy is posted at a conspicuous place in the workplace;
- Investigate any incidents and complaints of workplace violence in a manner that is appropriate in the circumstances;
- Review this workplace violence policy and its supporting program at least every 3 years or as often as necessary or if there is an incident of violence or if requested by the health and safety representative; and
- Designate a third-party to whom the worker(s) can report incidents of workplace violence where the alleged offender is the business owner, director, manager or a supervisor.

Managers and supervisors have the additional duty to act immediately if they observe or are presented with allegations of a potentially dangerous situation, including domestic violence. Managers and supervisors are responsible for addressing potential problems immediately and before they become serious.

Management must have an objective third-party investigate if allegations of violence name the owner or manager, as no one who reports to the accused person can perform an investigation into their conduct. Refer to the **Reporting Contact Form** found at the end of this Workplace Violence Prevention Plan for the name(s) and contact information of the Business's third-party designate.

3.2 EMPLOYEE RESPONSIBILITIES

Under the Workplace Violence Prevention Plan and Policy, the workers have the following responsibilities:

- Be aware of and adhere to this workplace violence policy and its supporting program;
- Treat individuals at the workplace with respect;
- Be an attentive participant in all training related to workplace violence and harassment;
- Refrain from engaging in any violent or threatening behavior at the workplace;
- Report any incidents of workplace violence, experienced or observed, as soon as possible to a manager, supervisor or Human Resources or a third-party designate;
- Embrace a violence-free workplace; and
- Co-operate in the investigation and resolution of matters involving workplace violence.

3.3 DOMESTIC VIOLENCE

The *Alberta OHS* Legislation requires employers to take every precaution reasonable in the circumstances to protect a worker from domestic violence that may occur in the workplace and expose co-workers to a risk of injury.

The Business recognizes that a worker experiencing domestic abuse may be reluctant to disclose the problem to his or her supervisor or manager for personal or safety reasons. The Business encourages disclosure in order to ensure the safety of the worker and everyone else in the workplace.

Although the Business respects a worker's desire for privacy and confidentiality, a worker is responsible to disclose situations which may threaten the safety of the worker or anyone else at the workplace to management. Examples of such situations may include threats made from an intimate partner or a previous partner, any restraining orders that list the physical workplace as a protected area workplace or any restraining orders that require a person to remain a certain distance away from the workplace at all times during the workday. Disclosure of such threats will ensure appropriate safety precautions can be developed to safeguard the worker and his or her co-workers in the workplace.

4.0 TRAINING

4.1 WORKPLACE VIOLENCE RELATED TRAINING

All workers will be provided with appropriate instruction and information on the contents of the Workplace Violence Prevention Policy and Program, so that they know:

- How to report incident(s) of workplace violence to the employer;
- How to report incident(s) of workplace violence where the Business owner, the employer, manager or supervisor is alleged to have committed violence against the worker;
- How the Business will investigate and deal with incidents or complaints of workplace violence;
- How the results of an investigation and any corrective actions will be provided to the concerned parties; and
- That information about an incident or complaint of workplace violence will be kept confidential.

Document the provided training by using the **Training on the Contents of the Violence and Harassment Plans and Policies Form**, found at the end of this Prevention Plan.

5.0 REPORTING WORKPLACE VIOLENCE

5.1 REPORTING PROCEDURES FOR WORKERS

5.1.1 Who to Report Workplace Violence To

Anyone who believes that they are the victim of workplace violence should immediately report the incident to management verbally or in writing by using the **Workplace Violence and Harassment Reporting Form** found at the end of this Workplace Violence Prevention Plan. When reporting verbally, the reporting contact, along with the worker who is making the complaint will fill out the complaint form.

Where it is alleged that a worker's immediate manager or a supervisor is the alleged offender, or if the worker is uncomfortable addressing the issue with his/her immediate supervisor or manager, the complaint should be made to another manager, supervisor or to the Human Resources department.

In the absence of a Human Resources department or another manager or supervisor to report the incident to, the worker should report the incident to the third-party that has been designated by the Business. Refer to the **Reporting Contact Form** found at the end of this Workplace Violence Prevention for the name(s) and contact information of the Business's third-party designate.

Similarly, anyone who has good reason to believe that workplace violence is occurring or has occurred should immediately report the matter to management by using the **Workplace Violence and Harassment Reporting Form** found at the end of this Workplace Violence Prevention Plan.

All incidents or complaints of workplace violence shall be kept confidential except to the extent necessary to protect workers, to investigate the complaint or incident, to take corrective action or otherwise as required by law.

If an emergency exists and the situation is one of immediate danger, then it should be immediately reported to the police by dialling "9-1-1" as soon as it is safe to do so. A person in a situation of immediate danger must, at the same time, take whatever steps are necessary to ensure their own safety and to protect themselves against harm or injury. Once a worker is safe, he or she can then report the matter to management.

All reported incidents or allegations of workplace violence will be taken seriously and investigated in accordance with the investigation protocols set out in this Workplace Violence Prevention Plan. Refer to the **Investigator Contact Form** for a list of the individuals that a worker can report an incident or of workplace violence to. This Form can be found at this end of this Program.

5.1.2 What to Include in the Report

A report of workplace violence must include the following details about the incident:

- Name and contact information of the worker(s) who has allegedly experienced workplace violence or threatening behaviour;
- Name, contact information and position of the alleged offender(s);
- Names and contact information of potential witnesses or anyone who may be able to provide relevant information about the alleged incident;
- A detailed summary of what happened with date(s), frequency, location(s) of the alleged incident(s); and
- Any supporting documents such as texts, emails, photos and letters relevant to the complaint.

5.2 No Reprisal

No retaliation or reprisals will be undertaken or tolerated against any worker who, in good faith, complains of, reports or participates in any investigation into allegations of workplace violence.

1.0 WORKPLACE VIOLENCE INVESTIGATION

Upon receiving a complaint(s) or allegation(s) of workplace violence, the Business shall conduct a prompt, thorough and confidential investigation into the allegation(s) or complaint(s).

The Business will also conduct an investigation if it indirectly becomes aware of an incident of workplace violence that is not formally reported, such as when a worker, supervisor or manager witnesses an incident of workplace violence or learns about it from a third party.

The Business may also, at its discretion, or where required by law, utilize the services of outside legal counsel, or such other external expertise as the Business may deem necessary in the circumstances. Ultimately, it is the aim of the Business to conduct investigations that are impartial and appropriate in the circumstances.

The investigation shall be completed in a prompt, timely manner and within a reasonable timeframe, unless there are extenuating circumstances (e.g., illness, complex investigation) warranting a longer investigation.

A complaint or allegation of workplace violence cannot be investigated by the individual who is the alleged offender of violence or a violent behaviour at the workplace.

Furthermore, under no circumstances will a complaint or allegation of workplace violence be investigated by an individual who is under the direct control of the alleged offender.

The Business will take all reasonable steps to ensure that conflicts of interest are avoided.

6.1 Investigation Process

6.1.1 Investigation Procedure

The investigation process will be fair and provide an opportunity for all concerned parties to respond to reports of allegations of workplace violence.

The investigation procedure is as follows:

1. Interview the Complainant(s): The investigator(s) shall interview the complainant(s) and reporting person (s) concerning the facts underlying his, her or their allegation(s).

2. Interview with the Respondent(s): The investigator(s) will interview the worker(s) accused of committing the workplace violence. The worker(s) will be asked for his, her or their response to the allegation(s) being made and for his, her or their side of the story.

3. Interviews with Witnesses and other individuals: The investigator(s) will then interview any other workers or other individuals who may have witnessed the incident(s) of alleged workplace violence, or who may otherwise be able to provide information relevant to the investigation.

4. Records: The investigation will be documented, and the record will consist of, among other things, detailed notes of all interviews with workers and witnesses and all other information relevant to the investigation. And,

5. Report: The results of the investigation will be reported, in writing, to management. The results will include an assessment of the validity of the complaint(s). The report will set out findings of fact and come to a conclusion about whether workplace violence had occurred or not.

Furthermore, the applicable investigation protocol may be altered if it is determined that it is necessary to do so, such as where there is a reasonable and imminent threat to a worker's safety.

6.2 Employee Cooperation

If it is necessary for the purposes of completing, carrying out or protecting the integrity of an investigation, or if it is necessary to maintain a work environment that is safe, secure, and free from threats, intimidation and violence. The Business may require a worker to remain out of the workplace (with pay) while an investigation is being conducted.

The participation and cooperation of all workers is critical to the development and implementation of the workplace violence prevention plan and policy. The refusal or failure of any worker to cooperate with an investigation is a serious form of misconduct for which a worker may be disciplined up to and including immediate dismissal for cause.

6.3 External Investigator

If the incident or complaint involves the owner, senior executives or if an unbiased and fair investigation cannot be guaranteed by the Business, an external person qualified to conduct a workplace violence investigation who has knowledge of the relevant workplace violence laws may be retained to conduct the investigation.

6.4 RESULTS OF THE INVESTIGATION

Within a reasonable amount of time (10 days as best practice) of the investigation being completed, the worker who allegedly experienced the workplace violence and the alleged offender, if he or she is a worker of the Business, will be informed in writing of the results of the investigation and any corrective action taken or that will be taken by the Business to address workplace violence.

If the investigation corroborates the complaint(s) to the satisfaction of the Business, then the Business will, among other things, take appropriate disciplinary action against the offending worker(s) and take any other actions or measures it deems necessary to properly address the incident(s) and prevent future incidences of workplace violence from occurring. The nature and extent of any disciplinary or remedial action shall be determined by the Business in its sole discretion and may include the immediate dismissal of the offending worker(s) for cause.

Where an investigation results in disciplinary action, the complainant(s) and the respondent(s) will be informed in writing. If the investigation does not corroborate the complaint(s), then the complainant(s) and the respondent(s) will be also advised in writing and the matter will be closed.

The amount of information provided about the corrective action will depend on the circumstances. However, it is necessary to indicate what steps the Business has taken, or will take, to prevent similar incidents of workplace violence, if workplace violence is found to have occurred.

7.0 RECORD KEEPING

The Business will ensure that, as part of the investigation, whether conducted by the Business itself or by a designated third-party, copies of the following documents shall be kept on record:

- Details of the complaint and/or the incident;
- A detailed record of the investigation including all relevant documents and notes;
- A copy of the **Workplace Violence and Harassment Reporting Form** (if one has been completed);

- A summary of the results of the investigation that was provided to the worker who allegedly experienced the workplace violence and the alleged offender, if a worker of the employer; and

- A copy of any corrective action taken to address the complaint or incident of workplace violence.

All records of the investigation must be kept confidential. The investigation documents should not be disclosed unless necessary to investigate an incident or complaint of workplace violence, take corrective action or otherwise as required by law.

7.1 Corrective Action and Discipline

If the Business determines that a worker has engaged in workplace violence, appropriate corrective action will be taken, up to and including immediate dismissal for cause.

When a violent incident occurs, the Business will evaluate the safety protocols in place to ensure their effectiveness. Management, in consultation with the Health and Safety Representative (HSR) will review the incident, outline what corrective or remedial actions are necessary to prevent or minimize the potential and impact of repeat occurrences, identify new or previously undefined risks and reassess the **Workplace Violence Risk Assessment Form**, review employee training and education programs and determine if they are adequate or if additional training should be provided.

In addition, the Business may require that a worker participate in a form of counselling or program, either voluntarily or as a condition of continued employment.

If the violent behaviour is that of a non-employee, then the Business will take appropriate action in an effort to ensure that such behaviour is not repeated, and if necessary, take measures to prevent the person from returning to the workplace.

However, not every complaint will warrant corrective action. Rather, corrective action will be determined on a case-by-case basis.

7.2 Reporting to the Police

All physical assaults will be reported to the police, as will any other behaviour that requires police intervention or follow-up, such as a situation of immediate or serious danger.

7.3 Intervention

The Business will intervene as appropriate if there is any indication of a violent or potentially violent situation. If a worker is considered to be at risk of violence either from within or outside of the workplace, a plan will be developed to minimize the risk and respond to any potential emergency situation. Potentially dangerous situations and any necessary precautionary measures will be promptly communicated to individuals who could be affected.

7.4 INCIDENT MANAGEMENT

In the event of a significant incident of workplace violence, the Business will immediately assess the situation and arrange for the following interventions as appropriate:

- Facilitation of medical attention;
- If necessary, report the matter to the police;
- Individual debriefing; and
- If necessary, and if possible, arrange for the provision of counselling services to affected workers.

The Business will investigate the incident(s), and if necessary, the Business will conduct a review of its workplace(s) and reassess the risk of workplace violence having regard for the circumstances that gave rise to the incident(s) in question.

The results of any assessment will be reported to the health and safety representative.

8.0 HAZARD ASSESSMENTS, REVIEWS AND INSPECTIONS

The Business shall conduct regular reviews of the Workplace Violence Prevention Policy and at a minimum, review its prevention plan once every 3 years or more often if there is an incident of violence or if the health and safety representative requests a review of the prevention plans.

The Business shall also conduct regular assessments of its workplace(s) in order to identify, eliminate or if elimination is not reasonably practicable, to control those hazards related to workplace violence. Moreover, the Business will make any amendments to this prevention plan and any other applicable policies, programs and procedures, as may be necessary based on the results of its assessments and reviews. The Business will utilize the **Workplace Violence Risk Assessment Form** for conducting its assessments. The Business will also ensure that appropriate corrective action is taken to reduce identified risks.

The results of any assessment will be reported to the health and safety representative.

If there is no health and safety representative or committee in place, then workers will be directly advised of any assessment. If the assessment is in writing, then workers will be provided with a copy on request or told how they might obtain a copy.

8.1 Risk Reduction Measures

The following measures are in place to minimize the potential for violence in the workplace:

Visitors

Visitors are required to sign in while on the premises. Any person with a history of violence or harassing behaviour may be barred from entering the workplace.

Exterior Entrances

All exterior entrances to a workplace are to be locked at all times except for the main entrance. No exterior doors are to be propped open. The main entrance will be open during normal business hours, unless the Business determines that the main entrance should be locked at all times for safety or operational purposes.

In the event that a worker has reason to believe that an individual may be violent or is exhibiting potentially violent behaviour at any entry point to the workplace, he or she must notify management immediately and take any protective action that is reasonably necessary in the circumstances.

Screening

All new workers, including students and apprentices, may be subject to appropriate security checks by management to ensure that they do not pose a risk of harm in the workplace.

Orientation

All new workers will be oriented to this policy, to any risks of violence relating to their employment and to procedures for managing potentially violent situations.

Training

As part of its general training protocols (see Section 4.0, "Education and Training" above), the Business will provide all of its workers with training regarding violence prevention as appropriate and as required by law. The training will be reviewed and if necessary, revised every 3 (three) years or whenever there is a change of circumstances that may affect the health and safety of workers.

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9.0 CONFIDENTIALITY

The Business recognizes the difficulty of coming forward with a complaint of workplace violence and a complainant's interest in keeping the matter confidential. To protect the interests of a complainant, a respondent, or any other person who may be involved in incidents of workplace violence, including witnesses, and to protect the integrity of the investigation process, confidentiality will be maintained throughout any investigation. Information relating to the complaint will be disclosed only to the extent necessary to carry out this workplace violence prevention plan or where disclosure is required by law.

All individuals involved in a workplace investigation are expected to keep the substance of the investigation strictly confidential. Unless otherwise set out in this policy, all records of complaints, including records of meetings, interviews, results of investigations and other relevant material, will be maintained in a confidential file and will be disclosed only to the extent necessary to carry out these procedures or where disclosure is required by law.

10.0 REGULAR PREVENTION PLAN REVIEW

The Violence Prevention Plan shall be monitored and reviewed every three (3) years or more often if there is an incident of harassment or violence or if the Health and Safety representative requests a review.

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WORKPLACE HARASSMENT PREVENTION POLICY STATEMENT

1.0 ORGANIZATIONAL COMMITMENT

The Business is committed to providing an environment free of harassment of any kind in which all individuals are treated with respect and dignity and is committed to eliminating or controlling the risk of harassment at its work site(s). Workplace harassment of any kind, sexual or otherwise from any persons will not be tolerated, condoned or ignored.

This Harassment Prevention Policy applies to all workers including full-time, part-time, temporary and contract staff, as well as volunteers, interns and apprentices and all levels of the organization and to every aspect of the workplace environment, including work-related events that may occur outside of the physical workplace and where applicable, to digital work environments. It is unacceptable for workers or contractors working on the Business's behalf to engage in harassing behaviour in the workplace or when interacting with clients, suppliers, service providers, potential clients or anyone with whom they have professional dealings with.

The Business will not disclose the circumstances related to an incident of harassment or the names of the complaint, the person alleged to have committed the harassment and any witnesses except:

- Where necessary to investigate the incident or take corrective action or to inform the parties involved in the incident of the results of the investigation and any corrective action to be taken to address the incident or; and
- As required by law.

Workers are encouraged to report any incidents of workplace harassment to their immediate manager, supervisor, Human Resources or the third party designated by the company. Management will investigate and deal with all complaints or incidents of workplace harassment in a fair, respectful and timely manner.

This Harassment Prevention Policy is not intended to discourage a worker from exercising their rights pursuant to any other law (e.g. contacting police, union grievance, etc.), including the *Alberta Human Rights Act*.

Managers, supervisors and workers are expected to adhere to this Policy and will be held responsible for not following it. Workers will not be penalized or disciplined for reporting an incident or for participating in an investigation involving workplace harassment.

On an annual basis, this Policy statement must be reviewed, dated and signed by the highest level of management at the workplace.

Name: _______________ Signature: _______________ Date: _______________

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WORKPLACE HARASSMENT PREVENTION PLAN AND POLICY

1.0 INTRODUCTION

The Business is committed to complying with all of the provisions contained in *Alberta Occupational Health and Safety Act, the Regulations and OHS Code SA 2017, c O-2.1*, any successor legislation, and the regulations thereto, as they are amended from time to time (collectively, the "Act, the Regulations and the OHS Code"), and in particular, Part 27 of the *Alberta Occupational Health and Safety Code* (Violence and Harassment). In addition, the Business is committed to providing an environment free of harassment of any kind in which all individuals are treated with respect and dignity. Workplace harassment of any kind, sexual or otherwise, will not be tolerated, condoned, or ignored.

This Workplace Harassment Prevention Plan supplements the Business's policy entitled Workplace Harassment Prevention Policy and outlines the responsibilities associated with this program. Further to consultation with the Health and Safety Representative (HSR) the program will be reviewed every three (3)years or more often if there is an incident of harassment or violence or if the health and safety committee or representative requests a review.

1.1 OBJECTIVES

The objectives of this Workplace Harassment Prevention Plan are to:

1. To take every precaution reasonable in the circumstances to prevent Workplace Harassment;

2. Ensure that all workers and visitors are aware that workplace harassment is unacceptable and incompatible with the Business's standards, as well as being a violation of the law; and

3. Set out the types of behaviour that may be considered offensive and are prohibited by this policy.

4. To provide guidelines on:

   - How to report and investigate Workplace Harassment; and

   - How to follow-up on incidents or reports of Workplace Harassment.

This policy is intended to promote appropriate standards of conduct at all times.

1.2 APPLICATION

The right to freedom from workplace harassment extends to all workers, including full-time, part-time, temporary and contract staff, as well as volunteers, interns and apprentices.

It is unacceptable for workers or contractors working on the Business's behalf to engage in harassing behaviour in the workplace or when interacting with clients and others with whom they have professional dealings, such as suppliers, service providers and potential clients.

This policy applies to every level of our organization and to every aspect of the workplace environment, including events that occur outside of the physical workplace, such as during business trips and staff events, and where applicable, to digital work environments.

2.0 DEFINITIONS

For the purposes of this Policy, the following terms are defined:

"Complainant"	"Complainant" refers to the person who is making a complaint under this Policy.
"Consent"	Means permission for something to happen or agreement to do something.
"Disclose"	Means sharing information pertaining to an incident of workplace harassment for the sole purpose of learning about and/or receiving support and services.
"Harassment"	Means engaging in a course of vexatious comment or conduct that is known or ought reasonably to be known to be unwelcome
"Report"	Means to inform about an incident of workplace harassment to a supervisor, manager or a third-party designate.

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"Reporting Contact"	The person to whom a worker can report any incidents of workplace harassment, experienced or observed.
"Respondent"	Refers to the person against whom a complaint has been filed under this Policy
"Third-Party Designate"	An individual or an organization designated by the Business to whom the worker(s) can report incidents or allegations of workplace harassment committed by the employer (e.g. the business owner, senior executives, directors, managers or supervisors)
"Work Site"	Means a location where a worker is, or is likely to be, engaged in any occupation and includes any vehicle or mobile equipment used by a worker in an occupation.
"Harassment"	Means any single incident or repeated incidents of objectionable or unwelcome conduct, comment, bullying or action by a person that the person knows or ought reasonably to know will or would cause offence or humiliation to a worker, or adversely affects the worker's health and safety, and includes (i) conduct, comment, bullying or action because of race, religious beliefs, colour, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression and sexual orientation, and (ii) a sexual solicitation or advance, but excludes any reasonable conduct of an employer or supervisor in respect of the management of workers or a work site;

1.1 EXAMPLES OF PROHIBITED BEHAVIOUR

Examples of the type of behaviour prohibited by this policy include, but are not limited to:

- Any form of sexual harassment, including touching, petting, pinching, kissing, unwelcome sexual flirtations, advances, requests, or invitations and leering or other suggestive gestures;
- Rough or vulgar humour or language related to sexuality, sexual orientation or gender;
- Invading personal space;
- Demanding hugs, dates or sexual favours;
- Asking questions, talking or writing about sexual activities;
- Leering or inappropriate staring;
- Unnecessary physical contact;
- Threatening to penalize or otherwise punish a worker if they refuse a sexual advance;
- The display of visual sexual material that is offensive, or which one ought to know, is offensive;
- Bullying;
- Demeaning and/or belittling comments;
- Offensive nicknames, remarks, jokes or innuendos;
- Obscene remarks or gestures;
- Display or circulation of offensive pictures, graffiti or materials, whether in print form or via e-mail or other electronic means;
- Singling out an individual for humiliating or demeaning teasing or jokes;
- Comments ridiculing an individual; and

- Creating a poisoned work environment thorough comments or conduct (including comments or conduct that are condoned or allowed to continue when brought to the attention of management). The comments or conduct may not be directed at a specific individual, and may be from any individual, regardless of position or status. A single comment or action, if sufficiently serious may create a poisoned environment.

Sexual harassment taken place at the workplace against a worker or workers is a prominent form of workplace harassment and will be treated as such.

2.2 Examples of What is Not Workplace Harassment

Reasonable action or conduct by a manager, supervisor or worker that is part of his or her normal work function will not normally be considered harassing. This is the case even if there are sometimes unpleasant consequences for a worker. Examples include:

- Changes in work assignments;
- Scheduling;
- Job assessments and evaluations;
- Workplace inspections;
- The implementation and enforcement of dress codes; and
- Counselling or disciplinary action.

Differences of opinion or minor disagreements between co-workers will also not generally considered to be workplace harassment.

3.0 ROLES AND RESPONSIBILITIES

1.1 Management Responsibilities

The Business's owner(s), managers and supervisors have the following responsibilities:

- Ensure all measures and procedures outlined in the workplace harassment prevention plan and policy are followed by workers and that workers have the information they need to protect themselves against workplace harassment;

- Promote a harassment-free workplace by enforcing this Workplace Harassment Prevention Plan and Policy;
- Develop workplace arrangements that minimize workplace harassment;
- Instruct and inform all workers as appropriate on the contents of this Workplace Harassment Prevention Plan and Policy;
- Warn workers about any potential risk of harassment in the workplace;
- Address and resolve incidents involving workers;
- Ensure that a copy of the Workplace Harassment Prevention Policy Statement is posted at a conspicuous place in the workplace;
- Investigate any incidents and complaints of workplace harassment in a manner that is appropriate in the circumstances and if necessary, report to the police; and
- Review this Policy and its supporting prevention plan once every three (3) years or as often as necessary or if there is an incident of harassment or if requested by the health and safety representative.

Managers and supervisors have the additional duty to act immediately on observations or allegations of workplace harassment. Managers and supervisors are responsible for addressing potential problems immediately and before they become serious.

Management must have an objective third-party investigator if allegations of harassment name the employer (Business owner, director, manager or a supervisor) as no one who reports to the accused person can perform an investigation into their conduct. Refer to the **Reporting Contact Form** found at the end of this Workplace Harassment Prevention Plan for the name(s) and contact information of the Business's third-party designate.

1.2 WORKER RESPONSIBILITIES

Under this Workplace Harassment Prevention Plan, the workers have the following responsibilities:

- Be aware of and adhere to the Workplace Harassment Prevention Plan and Policy;
- Treat individuals at the workplace with respect;
- Be an attentive participant in all training related to workplace violence and harassment;

- Refrain from engaging in any harassing or inappropriate or threatening behavior at the workplace;
- Report any incidents of workplace harassment, experienced or observed, as soon as possible to a manager, supervisor or Human Resources or a third-party designate;
- Embrace harassment-free workplace; and
- Co-operate in the investigation and resolution of matters involving workplace harassment.

Workers have the additional duty to notify management if a restraining order is in effect, or if a potentially violent non-work-related situation, such as domestic violence, exists and could result in violence or harassment in the workplace.

4.0 TRAINING

4.1 WORKPLACE HARASSMENT TRAINING

All workers will be provided with appropriate instruction and information on the contents of the Workplace Harassment and Sexual Harassment Prevention Policy and Program, so that they know:

- How to report incident(s) of workplace harassment to the employer;
- How to report incident(s) of workplace harassment where the employer or supervisor is the alleged harasser;
- How the Business will investigate and deal with incidents or complaints of workplace harassment;
- How the results of an investigation and any corrective actions will be provided to the concerned parties; and
- That information about an incident or complaint of workplace harassment will be kept confidential.

Document the provided training by using the **Training on the Contents of the Violence and Harassment Plans and Policies Form**.

4.2 No Reprisal

No retaliation or reprisals will be undertaken or tolerated against any worker who, in good faith, complains of, reports or participates in any investigation into allegations of workplace harassment.

5.0 REPORTING WORKPLACE HARASSMENT

5.1 REPORTING PROCEDURES FOR WORKERS

5.1.1 Who to Report Workplace Harassment To?

Anyone who believes that they are the victim of workplace harassment should immediately report the incident to management verbally or in writing by using the **Workplace Violence and Harassment Reporting Form**.

When reporting verbally, the reporting contact, along with the worker who is making the complaint will fill out the complaint form.

Where it is alleged that a worker's immediate manager or a supervisor may be responsible for the workplace harassment or if the worker is uncomfortable addressing the issue with his/her immediate supervisor or manager, the complaint should be made to another manager, supervisor or to the Human Resources department.

In the absence of a Human Resources department or another manager or supervisor to report the incident to, the worker should report the incident to the third-party that has been designated by the Business. Refer to the **Reporting Contact Form** for the name(s) and contact information of the Business's third-party designate.

Similarly, anyone who has good reason to believe that workplace harassment is occurring or has occurred should immediately report the matter to management by using the **Workplace Violence and Harassment Reporting Form**.

All incidents or complaints of workplace harassment shall be kept confidential except to the extent necessary to protect workers, to investigate the complaint or incident, to take corrective action or otherwise as required by law.

If an emergency exists and the situation is one of immediate danger, then it should be immediately reported to the police by dialling "9-1-1" as soon as it is safe to do so. A person in a situation of immediate danger must, at the same time, take whatever steps are necessary to ensure their own safety and to protect themselves against harm or injury. Once a worker is safe, he or she can then report the matter to management.

All reported incidents or allegations of workplace harassment will be taken seriously and investigated in accordance with the protocols set out in this Workplace Harassment Prevention Plan. Refer to the **Investigator Contact Form**, for a list of individuals that a worker can report an incident or of workplace harassment to.

5.1.2 What to Include in the Report

A report of workplace harassment must include the following details about the incident:

- Name and contact information of the worker(s) who has allegedly experienced workplace harassment;
- Name, contact information and position of the person who is alleged to have been involved in the workplace harassment;
- Names and contact information of potential witnesses or anyone who may be able to provide relevant information about the alleged incident;
- A detailed summary of what happened with date(s), frequency, location(s) of the alleged incident(s); and
- Any supporting documents such as texts, emails, photos and letters relevant to the complaint.

6.0 WORKPLACE HARASSMENT INVESTIGATION

Upon receiving a complaint(s) or allegation(s) of workplace harassment, the Business shall conduct a prompt, thorough and confidential investigation into the allegation(s) or complaint(s).

The Business will also conduct an investigation if it indirectly becomes aware of an incident of workplace violence that is not formally reported, such as when a worker, supervisor or manager witnesses an incident of workplace violence or learns about it from a third party.

The Business may also, at its discretion, or where required by law, utilize the services of outside legal counsel, or such other external expertise as the Business may deem necessary in the circumstances. Ultimately, it is the aim of the Business to conduct investigations that are impartial and appropriate in the circumstances.

The investigation shall be completed in a prompt, timely manner and within a reasonable timeframe, unless there are extenuating circumstances (e.g., illness, complex investigation) warranting a longer investigation.

A complaint or allegation of workplace violence cannot be investigated by the individual who is the alleged offender, or by the individual who is alleged to have engaged in violent or violent behaviour.

Furthermore, under no circumstances will a complaint or allegation of workplace harassment be investigated by an individual who is under the direct control of the alleged offender.

The Business will take all reasonable steps to ensure that conflicts of interest are avoided.

6.1 INVESTIGATION PROCESS

6.1.1 Investigation procedure

The investigation process will be fair and allow provide an opportunity for all concerned parties to respond to reports of allegations of workplace harassment.

The investigation procedure is as follows:

6. Interview the Complainant(s): The investigator(s) shall interview the complainant(s) and reporting person (s) concerning the facts underlying his, her or their allegation(s).

7. Interview with the Respondent(s): The investigator(s) will interview the worker(s) accused of committing the workplace harassment. The worker(s) will be asked for his, her or their response to the allegation(s) being made and for his, her or their side of the story.

8. Interviews with Witnesses and other individuals: The investigator(s) will then interview any other workers or other individuals who may have witnessed the incident(s) of alleged workplace harassment, or who may otherwise be able to provide information relevant to the investigation.

9. Records: The investigation will be documented, and the record will consist of, among other things, detailed notes of all interviews with workers and witnesses and all other information relevant to the investigation. And,

10. Report: The results of the investigation will be reported, in writing, to management. The results will include an assessment of the validity of the complaint(s). The report will set out findings of fact and come to a conclusion about whether workplace harassment was found or not.

Furthermore, the applicable investigation protocol may be altered if it is determined that it is necessary to do so, such as where there is a reasonable and imminent threat to a worker's safety.

6.2 Employee Cooperation

If it is necessary for the purposes of completing, carrying out or protecting the integrity of an investigation, or if it is necessary to maintain a work environment that is safe and free of harassment, the Business may require a worker to remain out of the workplace (with pay) while an investigation is being conducted.

The participation and cooperation of all workers is critical to the development and implementation of this workplace harassment policy and program. The refusal or failure of any worker to cooperate with an investigation is a serious form of misconduct for which a worker may be disciplined up to and including immediate dismissal for cause.

6.3 External Investigator

If the incident or complaint involves the owner, senior executives or if an unbiased and fair investigation cannot be guaranteed by the Business, an external person qualified to conduct a workplace harassment investigation who has knowledge of the relevant workplace harassment laws may be retained to conduct the investigation.

6.4 Results of the Investigation

Within a reasonable amount of time (10 days as best practice) of the investigation being completed, the worker who allegedly experienced the workplace harassment and the alleged harasser, if he or she is a worker of the Business, will be informed in writing of the results of the investigation and any corrective action taken or that will be taken by the Business to address workplace harassment.

If the investigation corroborates the complaint(s), to the satisfaction of the Business, then it will, among other things, take appropriate disciplinary action against the offending worker(s) and take any other actions or measures it deems necessary to properly address the incident(s) and

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prevent future incidences of workplace harassment from occurring. The nature and extent of any disciplinary or remedial action shall be determined by the Business in its sole discretion and may include the immediate dismissal of the offending worker(s) for cause.

Where an investigation results in disciplinary action, the complainant(s) and the respondent(s) will be informed in writing. If the investigation does not corroborate the complaint(s), then the complainant(s) and the respondent(s) will be also advised in writing and the matter will be closed.

The amount of information provided about the corrective action will depend on the circumstances but must, at a minimum, indicate what steps the Business has taken, or will take, to prevent similar incidents of workplace harassment, if workplace harassment is found to have occurred.

6.5 Reporting to the Police

All situations or any other behaviour that requires police intervention or follow-up, such as a situation of immediate or serious danger will be reported to the police.

6.6 Intervention

If a worker is considered to be at risk of harassment in the workplace, a plan will be developed to minimize the risk and respond to any potential emergency situation.

Should the Business become aware of an actual or potential incident of workplace harassment, every reasonable precaution will be taken in the circumstances to protect the affected worker.

6.7 Corrective Action and Discipline

If the Business determines that a worker has engaged in workplace harassment, then appropriate corrective action will be taken, up to and including immediate dismissal for cause.

When an incident of workplace harassment occurs, the Business will evaluate the safety protocols in place to ensure their effectiveness. Management, in consultation with the health and safety representative, on a case-per-case basis, will review the incident, outline what corrective or remedial actions are necessary to prevent or minimize the potential and impact of repeat occurrences, review employee training and education programs and determine if they are adequate or if additional training should be provided.

In addition, the Business may require that a worker participate in a form of counselling or program, either voluntarily or as a condition of continued employment.

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If the harassing behaviour is that of a non-employee, the Business will take appropriate action in an effort to ensure that such behaviour is not repeated, and if necessary, take measures to prevent the person from returning to the workplace.

However, not every complaint will warrant corrective action. Rather, corrective action will be determined on a case-by-case basis.

6.8 INCIDENT MANAGEMENT

In the event of a significant incident of workplace harassment, the Business will assess the situation and arrange for the following interventions as appropriate:

- Facilitation of medical attention;
- If necessary, report the matter to the police;
- Individual debriefing; and
- If necessary, and if possible, arrange for the provision of counselling services to affected workers.

The Business will investigate the incident(s), and if necessary, will conduct a review of its workplace(s) and reassess the risk of workplace harassment having regard for the circumstances that gave rise to the incident(s) in question.

The results of any assessment will be reported to the health and safety representative.

7.0 RECORD KEEPING

The Business will ensure that, as part of the investigation, whether conducted by the Business itself or by a designated third-party, copies of the following documents shall be kept on record:

- Details of the complaint and/or the incident;
- A detailed record of the investigation including all relevant documents and notes;
- A copy of the **Workplace Violence and Harassment Reporting Form** (if one has been completed);

- A summary of the results of the investigation that was provided to the worker who allegedly experienced the workplace harassment and the alleged harasser, if a worker of the employer;

- A copy of any corrective action taken to address the complaint or incident of workplace harassment.

All records of the investigation must be kept confidential. The investigation documents should not be disclosed unless necessary to investigate an incident or complaint of workplace harassment, take corrective action or otherwise as required by law.

The records must be kept on file for a minimum of one year.

8.0 CONFIDENTIALITY

The Business recognizes the difficulty of coming forward with a complaint of workplace harassment and a complainant's interest in keeping the matter confidential. To protect the interests of a complainant, a respondent, or any other person who may be involved in incidents of workplace harassment, and to protect the integrity of the investigation process, confidentiality will be maintained throughout any investigation. Information relating to the complaint will be disclosed only to the extent necessary to carry out this Workplace Harassment Prevention Plan, or where disclosure is required by law.

All individuals involved in a workplace investigation are expected to keep the substance of the investigation strictly confidential. Unless otherwise set out in this policy, all records of complaints, including records of meetings, interviews, results of investigations and other relevant material, will be maintained in a confidential file and will be disclosed only to the extent necessary to carry out these procedures or where disclosure is required by law.

9.0 HAZARD ASSESSMENTS

At least every three (3) years and minimally after each and every incidence of workplace harassment or when requested by the health and safety representative the Business shall complete an evaluation to determine whether a risk of workplace harassment exists due to the nature of the work or work environment.

Where workplace harassment risks are identified, the Business will implement any corrective measures that are required to reduce or eliminate the identified risks.

The results of any assessment will be reported to the health and safety representative.

If there is no health and safety representative or committee in place, then workers will be directly advised of any assessment. If the assessment is in writing, then workers will be provided with a copy on request or told how they might obtain a copy.

10.0 PREVENTION PLAN REVIEW

The Harassment Prevention Plan will be reviewed every three (3) years or more often if there is an incident of harassment or violence or if the health and safety representative requests a review.

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HAZARD REPORTING POLICY

1.0 POLICY STATEMENT

The Business is committed to complying with all of the provisions contained in *Alberta Occupational Health and Safety Act, Regulations and Code* SA 2017, c O-2.1, any successor legislation, and the regulations thereto, as all of them may be amended from time to time (collectively, the "*Act, Regulations and the OHS Code*") and in particular, Part 2 of the *OHS Code*, Hazard Assessment, Elimination and Control as it pertains to the identification and controlling of workplace hazards.

All workers of the Business are required to resolve and/or report any hazards that could result in an in incident or an injury to their supervisor or manager immediately. It is the policy of the Business to investigate all hazards reported and to provide a workplace to its workers, contractors, volunteers and visitors that is safe and free of hazards.

2.0 DEFINITION

"Hazard"	Any situation, behaviour, condition or circumstance or combination of these that could cause injury or illness to people or damage to property, such as completing dangerous work without adequate training, defective machinery and defective safety equipment, or a near miss.
"Near Miss"	Any unplanned event or incident that has the potential to cause, but does not actually result in an injury to a worker, or that does not actually cause environmental or equipment damage, or an interruption to normal operations
"Risk"	The chance of a loss or injury, measured in terms of severity (seriousness of potential occurrence) and probability (likelihood of occurrence)

3.0 HAZARD ASSESSMENT

The purpose of the hazard assessment is to identify and evaluate the conditions that could lead to workers getting hurt or becoming ill. Injuries and ill health can negatively impact the livelihood of workers and affect the Business if production is lost, machinery and equipment are damaged, insurance costs increase, or the Business is prosecuted.

3.1 HAZARD IDENTIFICATION

Before hazards can be eliminated or controlled, it is necessary that they first be recognized. The goal of hazard identification is to find and record possible hazards that may be present in your workplace. It may help to work as a team and include both people familiar with the work area, as well as people who are not – this way you have both the experienced and fresh eye to conduct the inspection.

Every workplace consists of four (4) major components. These are:

a) The people (employees, visitors, clients, suppliers, sub-contractors, etc);
b) The environment they work in;
c) The materials they work with; and
d) The equipment and tools they use.

Further, hazards in the workplace, including ergonomics-related hazards, must be identified and assessed, taking into account:

a) The nature of the hazard;
b) The employee's level of exposure to the hazard;
c) The frequency and duration of employees' exposure to the hazard;
d) The effects, real or apprehended, of the exposure on the health and safety of employees; and
e) The preventative measures in place to address the hazard.

When conducting a Hazard Assessment all the components mentioned above must be evaluated to identify what hazards are present and their associated risk. All workers involved in work tasks must participate in the hazard assessment and the assignment of controls or steps to eliminate the hazards identified. This includes the documentation and review of the hazards and the controls being used to control or eliminate those hazards with all affected workers.

3.2 WRITTEN ASSESSMENT

Putting the hazard assessment in writing moves it from an informal "what could go wrong?" approach to one that is more thorough and systematic. Having the assessment in writing also proves that it has been done.

When assessing hazards, the Business should keep the process simple by producing a written hazard assessment that applies to the worksite or work activities being reviewed. The assessment must indicate the methods used to eliminate or control the hazards identified.

Recommendations should be made to eliminate or control each of the hazardous conditions identified. The recommendations should include specific actions required to correct the problem.

The Business must be able to demonstrate that all existing and potential hazards have been identified.

An employer must:

- Assess a work site and identify existing and potential hazards before work begins at the work site or prior to the construction of a new work site;
- Prepare a report of the results of the hazard assessment and methods used to control or eliminate the hazards identified;
- Ensure that the date on which the hazard assessment is prepared or revised is recorded on it; and
- Ensure that the hazard assessment is repeated at reasonable intervals, when a new work process is introduced, when a work process or operation changes, or before the construction of significant additions or alterations to a work site.

3.3 WORKER PARTICIPATION

The Business will involve workers in hazard assessment, elimination and control activities. Workers are often very knowledgeable about the tasks or processes being assessed and can be directly affected by the hazard elimination and control activities. Workers often have more insight into a task or process than persons who only observe the completed work. To demonstrate compliance with this requirement, the Business, should be able to indicate which workers were meaningfully involved and to what extent. Workers should be able to confirm their involvement in the assessment, elimination and control activities.

3.4 Hazard Assessment Tools

Hazard assessments can be completed using the **Hazard Assessment Form** found at this end of this Policy. The assessment must identify the workplace hazards and indicate how those hazards will be eliminated or controlled. These types of hazard assessments are applicable to work sites that change very little over time.

Field Level Risk Assessment (FLRA) are used for work locations where the activities and conditions change. FLRA are done on-the-spot and are done at the beginning of the workday or when a new job/task is started. Refer to the **Field Level Risk Assessment (FLRA) Form**, found at the end of this Policy when conducing an FLRA.

3.5 Risk Assessment

Recognizing and evaluating the risks associated with hazards in the workplace is the second step in hazard control. The critical step in hazard control is the actions or methods that are developed and implemented in order to either control or eliminate identified hazards and potential risks.

STEP 1: Review hazards and assign a Risk Factor by multiplying the Probability by the Severity using the Risk Matrix provided in section 7.0 of this Policy.

STEP 2: If any one risk factor is within the Red Zone, **STOP WORK,** Contact Supervisor/Manager Immediately. Tasks with risk factors within the Red ZONE require a Supervisor, Manager to verify that controls are adequate prior to performing the task

4.0 TYPE OF HAZARDS

There are many types of hazards. A common way to classify hazards is by putting them into different categories:

Types of Hazards	
Biological Hazards	bacteria, viruses, insects, plants, birds, animals, and humans, etc.
Chemical Hazards	depends on the physical, chemical and toxic properties of the chemical
Ergonomic Hazards	repetitive movements, improper set up of workstation, etc.

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Physical Hazards	radiation, magnetic fields, temperature extremes, pressure extremes (high pressure or vacuum), noise, etc.
Psychosocial Hazards	stress, violence, harassment, etc.
Safety Hazards	slipping/tripping hazards, inappropriate machine guarding, equipment malfunctions or breakdowns.

5.0 HAZARD ELIMINATION AND CONTROL

Hazard controls are the method of preventing or controlling worker exposure to health and safety hazards. They vary from buying the right equipment to developing safe work procedures. The requirements may seem as simple as wearing PPE or as in-depth as certified training. For every task that is seen as critical or any piece of equipment that involves risk, the Business must assess and develop a method of control to reduce and/or eliminate these risks.

Whenever possible, hazards should be eliminated or controlled at the source using engineering solutions. If this is not possible, controls should be placed between the source and the workers. The closer a control is to the source of the hazard the better. If this is not possible, hazards must be controlled at the level of the worker through administrative controls and personal protection equipment (PPE). These control methods reduce the likelihood and severity of worker injury but do not eliminate the hazard.

Whatever control method is used, it should attack the source of the hazard, not its outward signs. The Business should be able to describe which hazards identified by the hazard assessment have been eliminated or controlled. For remaining hazards, particularly those being controlled by PPE, the Business should be able to explain why those hazards could not practicably be eliminated. All reasonably practicable steps should have been taken to first eliminate the hazard.

1.1 Engineered Hazard Controls

Engineering controls provide the highest degree of worker protection because they eliminate or control the hazard at its source. Engineering controls are the preferred method of eliminating or controlling hazards.

Engineering controls include the following:

- **Elimination** – getting rid of a hazardous job, tool, process, machine or substance.
- **Substitution** – if elimination is not practical, try substituting or replacing one substance or process with another.
- **Redesign** – hazards can sometimes be "engineered out" through redesign of the worksite, stations.
- **Isolation** – hazards can sometimes be isolated through containment or enclosure.
- **Automation** – some processes can be automated or mechanized.

1.2 Administrative Hazard Controls

If engineering controls cannot eliminate or control a hazard, administrative controls can be used to reduce the hazard to a level that is as low as reasonably achievable. Administrative controls are process and procedure related. Changing the way the job is managed reduces the risk of injury. Safe work procedures are administrative tools that provide safe work guidance. Administrative controls are less effective than engineering controls since they do not eliminate the hazards.

1.3 Personal Protective Equipment (PPE)

As a last resort, workers may need to use PPE to reduce the potentially harmful effects of exposure to a known hazard. PPE is much less effective than engineering controls since it does not completely eliminate the hazards. PPE must be used properly and consistently to be effective. Awkward or bulky PPE may prevent a worker from working safely. In some cases, PPE can increase the likelihood of hazards, such as heat stress and tripping and falling.

The Business may use a combination of engineering controls, administrative controls and/or Personal protective equipment that results in a greater level of worker safety than if each was used individually.

Refer to the following page for a **Hazard Elimination Flowchart.**

Hazard Elimination Flowchart

ELIMINATION	Elimination physically removes the hazards.
SUBSTITUTION	Substitution replaces the hazards with less hazardous alternatives.
ENGINEERING CONTROLS	Engineering controls isolate or separate the workers from the hazards
ADMINISTRATIVE CONTROLS	Administrative controls change the way people work (procedures, processes, work practices, etc)
PERSONAL PROTECTIVE EQUIPMENT (PPE)	PPE is the last line of defense and include safety glasses, gloves, respirators, hard hats, safety footwear.

6.0 RISK MATRIX

1.1 ANALYSING THE HAZARDS

Now that the hazards have been identified, they can be analysed to determine the probability that it could happen and how severe the damage could be if it did happen. This is done by utilizing a Risk Matrix.

A risk matrix calculates the risk score for a given risk. Risk is the chance or probability that a person will be harmed or experience an adverse health effect if exposed to a hazard. It may also apply to situations with property or equipment loss, or harmful effects on the environment.

A risk matrix visualizes risks as a diagram. It divides risks based on two (2) factors – the likelihood or probability of a risk and the extent of the damage or severity associated with that risk.

There are three (3) components of a risk matrix:

1. Probability or likelihood.
2. Potential consequences or severity.
3. Risk priority.

Probability or Likelihood: How likely the hazard is to occur. It is ranked as follows:

- Almost Certain: Expect to occur regularly under normal circumstances.
- Likely: Expected to occur at some point.
- Possibly: May occur at some point.
- Unlikely: Not likely to occur in normal circumstances.
- Rare: Could happen but probably never will.

Potential Consequences: How much or how severe will the damages be if the event happens. It is ranked as follows:

- Severe: Results in serious injuries, disabilities or fatalities.
- High: Injuries or illnesses that require hospital admission (Serious down time).
- Medium: Injuries or illnesses requiring medical treatment.
- Low: Minor injuries or discomfort treatable with first aid.
- Very Low: No injury to workers and minor equipment damages.

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Risk Factor:
The risk factor values/zones are determined by multiplying the scores for the probability and severity values together. The greater the resulting number, the greater the priority. This rating is calculated through the probability and severity scores, using the following Risk Matrix table.

Risk Factor		
RED ZONE	**High Risk Work**	**STOP WORK IMMEDIATELY** and speak to a manager/supervisor.
ORANGE ZONE	**Moderate Risk**	Proceed work with caution. Speak to supervisor if unsure.
YELLOW ZONE	**Minor/Low Risk**	Low risk. Proceed with work.
GREEN ZONE	**Negligible Risk**	Minimal risk. Proceed with work.

RISK MATRIX

		Potential Consequences or Severity				
		Very Low	**Low**	**Medium**	**High**	**Severe**
Probability or Likelihood	**Almost Certain**	5	10	15	20	25
	Likely	4	8	12	16	20
	Possibly	3	6	9	12	15
	Unlikely	2	4	6	8	10
	Rare	1	2	3	4	5

7.0 PROCEDURE FOR REPORTING HAZARDS AND UNSAFE CONDITIONS

1.1 WORKERS

All hazards encountered by a worker must be reported to a supervisor or to a member of management immediately. The worker must then:

1. Fill out the **Hazard Reporting Form** along with a supervisor or a member of management; and
2. Immediately submit the completed hazard reporting form to management.

The **Hazard Reporting Form** is found at the end of this Hazard Assessment Policy.

7.2 SUPERVISORS AND MANAGEMENT

Upon receiving a hazard reporting form, or upon becoming aware of a workplace hazard, whether reported or not, supervisors and members of management must:

1. Complete the second part of the hazard report form within 24 hours of receiving it;
2. Make recommendations regarding how to control the hazard and establish an action plan for carrying out those recommendations;
3. Assign a member of management, or a supervisor, or both, to implement the action plan and to ensure that the hazard is rectified;
4. Confirm completion and execution of the action plan;
5. File and maintain a record of the hazard report;
6. Submit the complete hazard report form and action plan to health and safety and to a health and safety representatives; and
7. Advise the worker who reported the hazard of the outcome of the report and action plan.

8.0 ROLE OF THE HSR

The Business's health and safety representative will monitor hazards and hazard reporting and make any recommendations to management that are deemed necessary.

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ACCIDENT AND INJURY REPORTING POLICY

1.0 REPORTING POLICY STATEMENT

It is the policy of the Business that all workers and staff ***immediately report*** any workplace accident, injury or near miss on a project site, to a supervisor and to management, as well as to any health and safety representative using the **Workplace Accident, Injury or Near Miss Reporting Form** found at the end of this Accident and Injury Reporting Policy. All work site parties must also comply with all other safety legislations including *Workers' Compensation Act* as they pertain to workplace accident and injury reporting requirements.

Management is committed to assisting all personnel after an incident or an injury and to taking all steps necessary to minimize future occurrences of the incident.

Timely and appropriate reporting of incidents will ensure the investigation process will begin promptly and all necessary medical attention is rendered, and external reporting will take place.

2.0 INCIDENT AND ACCIDENT REPORTING PROCEDURES AND ACTION PLANS

2.1 SERIOUS INJURIES AND INCIDENTS

In the event that one of the reportable injuries or incidents listed below (from a to f) occurs at a work site, the prime contractor or, if there is no prime contractor, the employer shall report the time, place, and nature of the injury or incident to a Director of Inspection of Alberta OHS as soon as possible.

The injuries and incidents to be reported to the Director of Inspection of Alberta Occupational Health & Safety (OHS) are:

a. An injury or incident that results in the death of a worker;

b. An injury or incident that results in a worker being admitted to a hospital, and for the purposes of this clause, "admitted to a hospital" means when a physician writes admitting orders to cause a worker to be an inpatient of a hospital, but excludes a worker being assessed in an emergency room or urgent care center without being admitted;

c. An unplanned or uncontrolled explosion, fire or flood that causes a serious injury or that has the potential of causing a serious injury;

d. The collapse or upset of a crane, derrick or hoist;

e. The collapse or failure of any component of a building or structure necessary for the structural integrity of the building or structure; or

f. Any injury or incident or a class of injuries or incidents specified in the OHS regulations.

If an injury or incident referred to above occurs at a work site or if any other injury or any other incident that has the potential of causing serious injury to a person occurs at a work site, the prime contractor, or if there is no prime contractor, the employer, shall:

- Report the time, place and nature of the incident to Alberta OHS at 1-866-415-8690;
- Carry out an investigation with the participation of the HSR into the circumstances surrounding the injury or incident;
- Prepare a report outlining the circumstances of the injury or incident and the corrective action, if any, undertaken to prevent a recurrence of the injury or incident;
- Ensure that a copy of the report is readily available and provided to an officer on demand; and
- Provide a copy of the report to a Director of Inspection of Alberta OHS, the joint work site health and safety committee or health and safety representative, if applicable, or, if there is no committee or representative, make it available to workers once the investigation is complete.

In the event that any of the scenarios listed above occurs (a to f) the Business shall ensure that any person(s) who have been injured or killed are attended to, the scene of the incident is not disturbed unless directed to do so by a provincial government OHS officer, action has been taken to prevent further injuries and property that's endangered by the incident is protected.

2.2 Potentially Serious Incident (PSI)

A Potentially Serious Incident (PSI) is any event where a reasonable and informed person would determine there would be a high likelihood for a serious injury to a person.

An injury is considered serious if it:

- Results in a fatality; or
- Causes an individual to be admitted to hospital as an inpatient.

It is important to note that the definition of Potentially Serious Incident (PSI) is not limited to workers and includes other persons, such as the public.

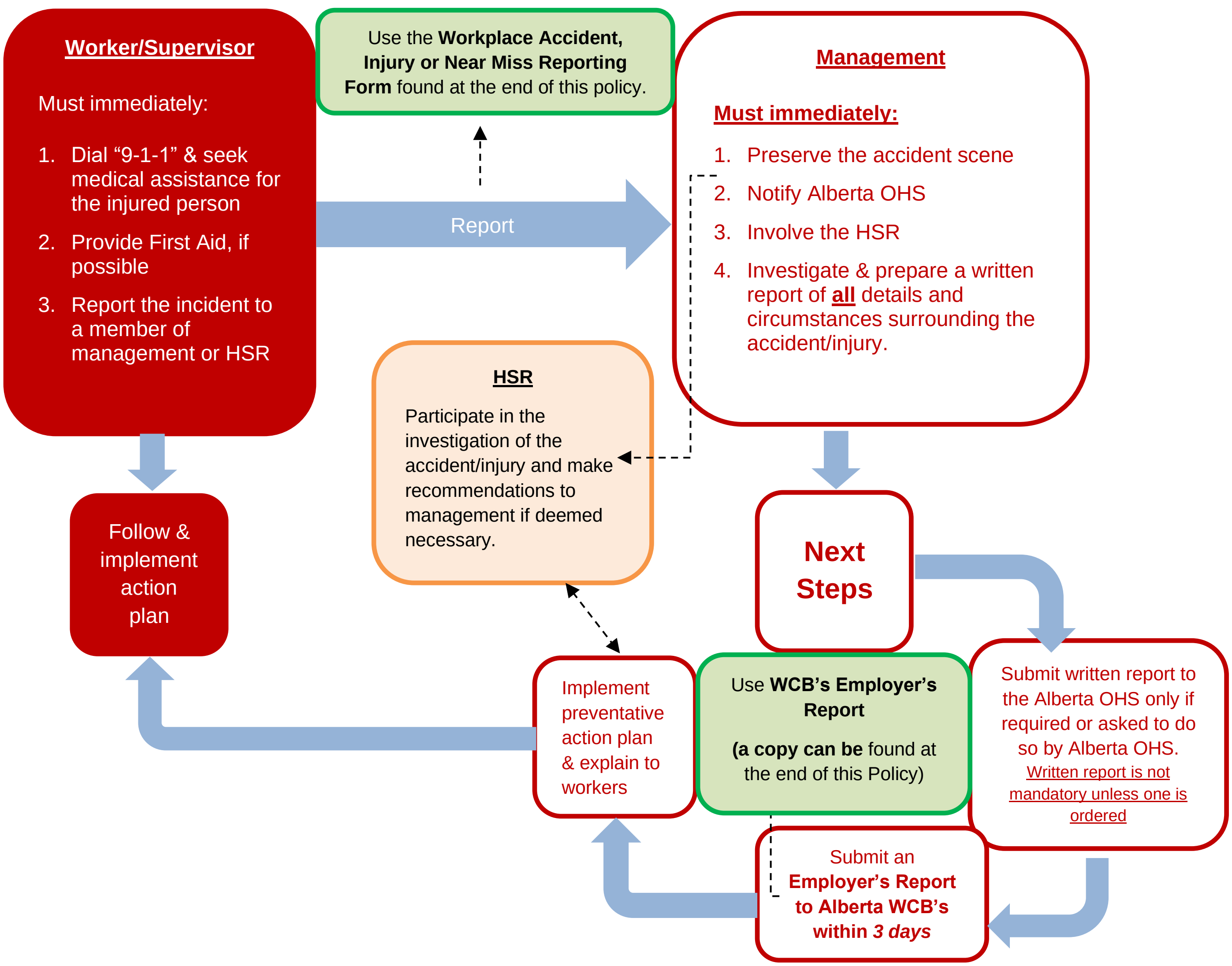
The terms PSI and Near Miss are sometimes used interchangeably.

All PSIs must be reported immediately to the Director of Inspection of Alberta OHS.

2.2.1 Reporting fatalities, serious injuries or PSIs

Fatalities, serious injuries or PSI's such as those listed in the previous section must be reported immediately by the Business to Alberta OHS. An **Employer's Report Form** must also be submitted to the Alberta WCB within three (3) days (72 hours) of the incident and an internal investigation, with the participation of the HSR, must be launched to investigate circumstances surrounding the injury or incident.

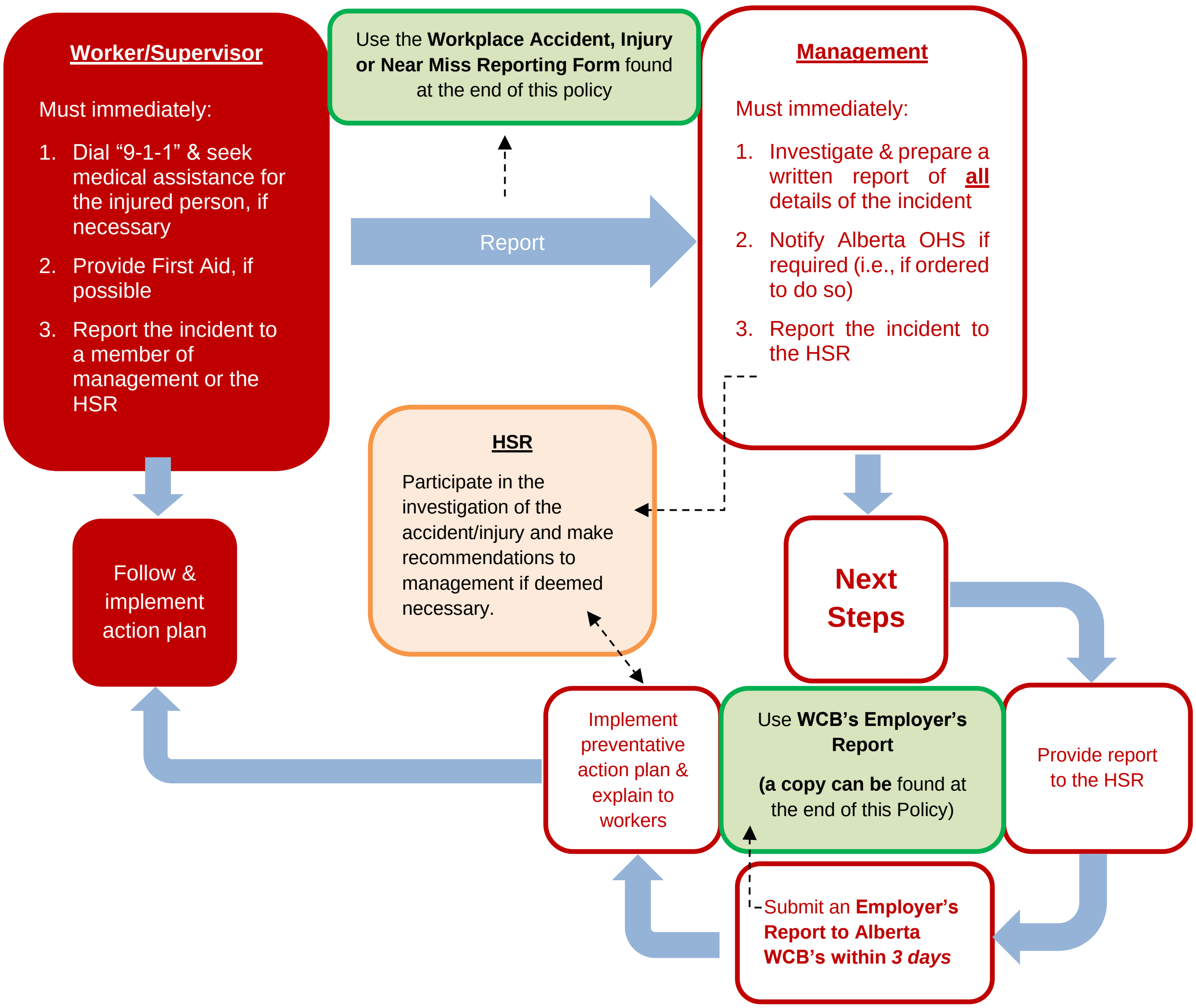
The following flowchart summarizes the steps the Business must take following workplace fatalities, serious incidents or PSI's.



2.2.2 Non-Fatal Accidents and Injuries or occupational illnesses

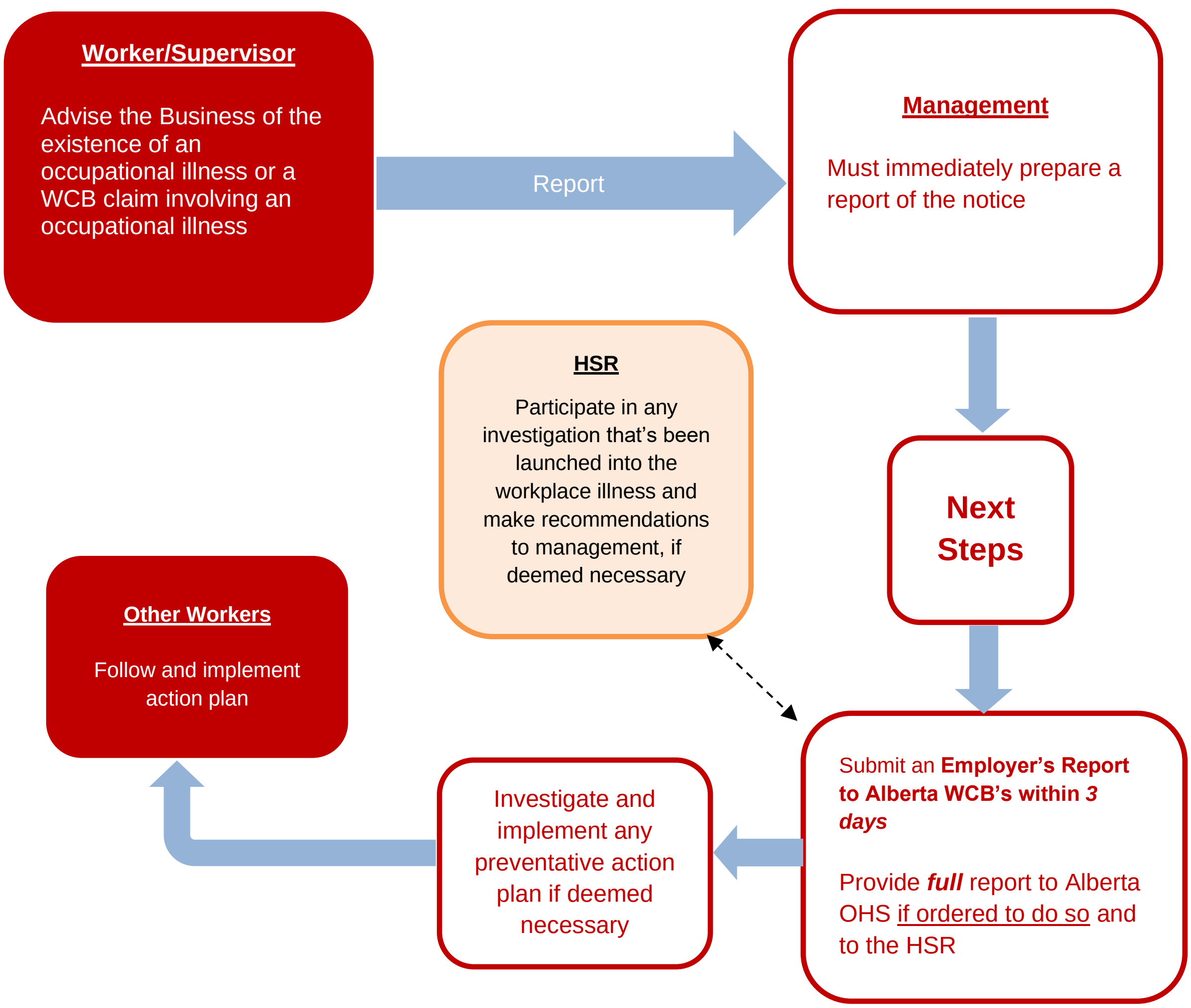
Non-fatal accidents, injuries and incidents must also be acted upon immediately by the Business. All work-related injuries or illnesses must be reported to Alberta WCB within three (3) days (72 hours) of being notified using the **Employer's Report Form**. An internal investigation, with the participation of the HSR shall be launched to investigate circumstances surrounding the injury or incident.

The following flowchart summarizes the steps the Business must take following workplace fatalities, serious incidents or PSI's:



2.2.3 Reporting Occupational Illnesses

If a worker or former worker advises the Business, either directly or through another person (such as the worker's representative or lawyer), that he or she has an occupational illness, or that a claim involving an occupational illness has been filed with the WCB by or on behalf of the worker, then the Business has three (3) days (72 hours) after becoming aware of the worker's illness to submit a written report to Alberta WCB, using the **Employer Reporting Form.**



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3.0 ACCIDENTS AND INJURIES INVESTIGATION PROCEDURE

3.1 OVERVIEW OF ROLES AND RESPONSIBILITIES

Business Member	Fatal or serious accidents and injuries	Non-fatal accidents, injuries or potentially serious incidents (PSI)	Occupational Illnesses
Workers	Seek immediate medical assistance and report the incident to a supervisor, management or a HSR. Submit a **Worker's Report** Form to WCB (if possible)	Seek immediate medical assistance and report the incident to a supervisor, management or to a HSR. Submit a **Worker's Report** Form to WCB (if applicable)	Report the illness to management then afterwards submit a **Worker's Report** Form to WCB
Supervisors	Seek immediate medical assistance, report the incident to management and preserve the accident scene for investigation	Seek immediate medical assistance; notify management and preserve the accident scene for investigation	Report the illness to management if made aware
Management	Immediately notify the Alberta OHS by phone and the HSR; secure the accident scene; conduct a ***full investigation*** of the accident; prepare a detailed ***written*** report to submit it to Alberta OHS if/when ordered to do so, submit an **Employer's Report** Form to WCB within ***3 days*** (if applicable) and implement a preventative action plan.	Prepare a detailed ***written*** report of the incident; notify Alberta OHS if required (i.e., ***if*** ordered to do so); report the incident to the HSR; conduct an ***investigation***; provide a report to the HSR. Submit the **Employer's Report** to the WCB **within 3 days** (if applicable) and implement a preventative action plan	Notify the WCB within 3 days of learning about the occupational illness. Inform the HSR. Launch an investigation to learn the causes of the illness.
HSR	Attend the accident scene, participate in the **investigation**, help **prepare *a written report*** to submit to Alberta OHS and make recommendations to management	Attend the accident scene, participate in the **investigation**, help **prepare *an investigation report*** and make recommendations to management	participate in investigation of the illness, help prepare *an investigation report* and make recommendations to management
Form to Use	- Workplace Accident, Injury or Near Miss Reporting Form - Workplace Accident, Injury or Near Miss Witness Statement - WCB's Employer's Report - WCB's Worker's Report	- Workplace Accident, Injury or Near Miss Reporting Form - Workplace Accident, Injury or Near Miss Witness Statement - WCB's Employer's Report - WCB's Worker's Report	- Workplace Accident, Injury or Near Miss Reporting Form - WCB's Employer's Report - WCB's Worker's Report

1.2.1 Workers

In the event of a workplace accident or injury, a worker must:

- If a serious injury has occurred, seek out, or assist with seeking out, immediate medical assistance, such as by dialling “9-1-1”;
- Immediately notify, or help notify, a supervisor, a member of management or HSR;
- Cooperate fully with and assist in securing the incident scene;
- Cooperate fully and assist with any investigation into the incident;
- Refrain from in any way tampering with any evidence or other items at the incident scene, including any tools, equipment;
- Complete the **Accident, Injury or Near Miss Reporting Form** found at the end of this Accident and Injury Reporting Policy; and
- If applicable, file a completed **WCB Worker’s Report Form** which can be found at the end of this Accident and Injury Reporting Policy and submit to the WCB ***after reporting the incident to the employer.***

Note: **WCB’s Workers Report** can also be obtained from WCB’s website or you can contact Peninsula’s Advice line to request a copy.

1.2.2 Supervisors

In the event of a workplace accident or injury, a supervisor shall:

- Seek, or assist with seeking out, immediate medical assistance, such as by dialling “9-1-1”;
- Immediately notify, or help notify, a member of management or a HSR;
- Cooperate fully with and assist in securing the accident scene;
- Cooperate fully and assist with any investigation into the accident;
- Refrain from in any way tampering with any evidence or other items at the accident scene, including any tools or equipment; and
- Complete the **Accident, Injury or Near Miss Reporting Form** found at the end of this Accident and Injury Reporting Policy.

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1.2.3 Management

In the event of a serious workplace accident or injury as described in section 2.1 of this Accident and Injury Reporting Policy, management shall:

- Notify emergency response personnel (i.e., police and paramedics) if they have not been notified already;
- Immediately notify the Director of Inspection of Alberta OHS and the HSR;
- Assume control of and preserve the accident scene as soon as possible;
- Carry out a detailed investigation as soon as possible;
- Obtain the names of and obtain statements from any and all relevant witnesses;
- Take photographs of the accident scene;
- Collect all relevant records and other information, such as maintenance reports and equipment inspection records;
- Attempt to identify the cause(s) of the accident;
- Prepare a ***written*** investigation report;
- Provide a copy of the report to a Director of Inspection of Alberta OHS, the joint work site health and safety committee or health and safety representative, if applicable, or, if there is no committee or representative, make it available to workers once the investigation is complete;
- Prepare and implement a preventative action plan; and
- If applicable, file a completed **WCB Employer's Report Form** which can be found at the end of this Accident and Injury Reporting Policy and submit to the WCB ***within three (3) days*** of the incident occurring.

Note: **WCB's Employers Report** can also be obtained from WCB's website or you can contact Peninsula's Advice line to request a copy.

1.2.4 Role of the HSR

In the event of a serious workplace accident or injury as described in Section 2.1, a health and safety representative, shall:

- Attend the accident scene and notify emergency response personnel (i.e., police and paramedics) if they have not been notified already; and
- Participate in the investigation into the accident or the injury.

1.2.5 Witnesses

In each case, witnesses should complete the **Workplace Accident, Injury or Near Miss Witness Statement Form** that can be found at the end of this Accident and Injury Reporting Policy.

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REFUSAL TO WORK POLICY

1.0 POLICY STATEMENT AND APPLICATION

It is the policy of the Business to follow the rules and provisions contained in Part 4 of Alberta's *OHS Act* (Dangerous Work and Discriminatory Action), regarding a worker's right to refuse work, including all of the exemptions set out in *Act*.

All the policies and procedures set out in this section shall apply to all workers who are ***not exempt*** according to the applicable provisions of the *Act*. In addition, this policy ***does not*** bestow rights upon workers regarding refusal rights over and above those specifically set out in the *Act*.

Given the Business's commitment to health and safety, and as a result of the implementation of its health and safety program, including the creation and dissemination of this policy manual, the Business expects that there will be occasions on which its workers will be required to refuse to work on the grounds that it is unsafe.

1.1 WORK REFUSALS

Subject to the provisions of the *OHS Act* (including the exemptions contained therein), a worker may refuse to work or to do particular work at a work site, if the worker believes on reasonable grounds that there is a dangerous condition at the work site or that the work constitutes a danger to the worker's health and safety or to the health and safety of another worker or another person.

1.2 REPORTING AND INVESTIGATION PROCEDURE

If a worker has refused to work, he or she must immediately report the circumstances of the refusal to his or her supervisor or to a member of management by completing the **Work Refusal Reporting Form** found at the end of this Refusal to Work Policy. The supervisor or Management shall take any action necessary to remedy any dangerous conditions or to ensure that such action is taken.

Management will then promptly investigate those circumstances in the presence of the worker and in the presence of a health and safety representative.

During the investigation, the worker shall remain in a safe location and must be available to the Business to answer any questions and to provide any information necessary for a proper investigation.

Following the completion of the investigation, the Business will notify the worker and the health and safety representative of its findings. The Business will prepare a written report of its findings and provide a copy to the worker who refused the work and the HSR.

1.3 OUTCOME

If after receiving the results of the Business's investigation the worker feels that he or she still has reasonable grounds to believe that his or her work is unsafe, then the worker may refuse to work and may file a complaint with an Alberta Occupational Health and Safety Officer.

When a worker has refused to work or to do particular work as described above, the employer shall not request or assign another worker to do the work until the employer has determined that the work does not constitute a danger to the health and safety of any person or that the dangerous condition does not exist. Where the employer does assign another worker to do the work, the employer shall advise the worker in writing of:

- The first worker's refusal;
- The reasons for the refusal;
- The reason(s) why, in the opinion of the employer, the work does not constitute a danger to the health and safety of any person or that a dangerous condition is not present; and
- That worker's right to refuse to do dangerous work under this section.

1.0 DISCRIMINATORY ACTION COMPLAINT

No person shall take discriminatory action against a worker by reason of that worker:

- Acting in compliance with the *Act, Regulations or the OHS Code*;
- Being called to testify, intending to testify or testifying in a proceeding under the *OHS Act;*
- Giving relevant information about work site conditions affecting the health and safety of any worker engaged in work or any other person present at the work site to any of the following:
    - An employer or a person acting on behalf of an employer;

- An officer or another person concerned with the administration of the *Act, Regulations or the OHS Code*;
- A health and safety representative;
- Performing duties or exercising rights as a health and safety representative;
- Assisting or having assisted with the activities of a health and safety representative;
- Refusing to do work on reasonable grounds that the work may endanger the health and safety of the worker or other workers;
- Seeking to establish or have a health and safety representative designated;
- Being prevented from working because of an order under the *Act*; and
- Taking reasonable action to protect the health and safety of that worker or any other person.

A worker who has reasonable cause to believe that he or she has been subjected to discriminatory action as described above may file a complaint with an Alberta Occupational Health and Safety Officer.

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EARLY AND SAFE RETURN TO WORK POLICY AND PROGRAM

1.0 POLICY STATEMENT

The Business is committed to developing and maintaining a safe and healthy work environment. In addition, the Business is committed to complying with the *Alberta Occupational Health and Safety Act, Regulations and OHS Code* as well as the *Alberta Worker's Compensation Board Act, Legislation,* and the regulations thereto, and any successor legislation, as they are amended from time to time. Accordingly, the Business will make every reasonable effort to provide suitable employment to any employee unable to perform their duties as a result of a work-related injury.

The purpose of this Return to Work (RTW hereafter) Program is to:

- Provide for the early and safe return to work of injured employees;
- Provide gainful employment for employees who are temporarily disabled due to an injury in the workplace; and
- Restore, at a minimum, the employee's ability to perform the essential duties of their pre-injury work duties.

The Program addresses the possibility of an employee returning to perform their regular job with modifications or, when available, alternate temporary work that meets the injured employee's functional abilities.

The Business, in consultation with the health and safety representative will develop, establish, and put into effect measures and procedures to ensure that all protocols in this Program are implemented and followed at the workplace.

2.0 SCOPE

The Program applies to all employees of the Business, including management. The Program sets out a collaborative and outcome-based process to assess, plan, implement, coordinate, monitor, and evaluate the options and services required to meet an individual's needs. RTW case management shall confirm that every effort should be made to ensure that the work assigned is suited to both the worker's physical and personal abilities and contributes to the productivity of the Business.

3.0 DEFINITIONS

For the purposes of this Program, the Business adopts the following definitions:

"Accommodation"	Providing assistance or support to a worker in the effort to ensure they are able to perform work duties that are appropriate to their functional abilities and/or restrictions; providing modified duties to an injured worker
"Serious Injuries and incidents"	An injury or incident is considered serious in nature under the *Alberta OHS Act,* Section 40, if it results in: • the death of a worker, • a worker being admitted to a hospital, and for the purposes of this clause, "admitted to a hospital" means when a physician writes admitting orders to cause a worker to be an inpatient of a hospital, but excludes a worker being assessed in an emergency room or urgent care centre without being admitted, • an unplanned or uncontrolled explosion, fire or flood that causes a serious injury or that has the potential of causing a serious injury, • the collapse or upset of a crane, derrick or hoist, • the collapse or failure of any component of a building or structure necessary for the structural integrity of the building or structure, or • any injury or incident or a class of injuries or incidents specified in the regulations.
Form C040 **"Employer Report of Injury"**	Employer's report to be completed within **72 hours** of being notified of injury, whether lost time or non-lost time and the injured worker is transported for medical aid. Hard copy completed and submitted, or online
Form C060 **"Worker Report of Injury or Occupational Disease"**	Worker's report to be completed by injured worker and submitted (can be done via hard copy or online). Copy given to Employer.

Form C545 **"Physical Demands Analysis"**	A Physical Demands Analysis contains information provided by the Health Care professional regarding an employee's physical abilities and/or limitations and return to work information.
Form C050 **"First Physician's Report"**	Report completed by medical professional of a work-related injury. One copy is submitted to Alberta WCB and a copy is given to the injured worker. This will need to be submitted to employer.
Form C151 **"Physicians Progress Report"**	This report is completed by the attending physician and submitted once the worker is cleared to return to regular duties. A copy is sent to Alberta WCB and to the injured worker. This is submitted to the employer.
"Health Care Professional"	A person licensed to operate within any branch of health care, including medicine, surgery, dentistry, midwifery, pharmacy, psychology, nursing, or allied health professions.
"Lost Time Injury"	Work-related injury that results in time lost from work past the day of injury. This may be as little as one shift/work lost due to the injury.
"Modified Duties"	An offer for a temporary work assignment made to an employee who is recovering from an illness or injury and/who has received clearance from a physician to return to work under specific limitations.
"No Lost Time Injury"	Work-related injury where no time is lost from work other than on the day of the injury
"Return to Work Coordinator"	Return to Work Coordinators work internally within their own organization or externally as a provider. Responsibilities include, but are not limited to expediting, coordinating and

	facilitating the return to work of persons with injuries, illnesses and disabilities into the workplace

4.0 ROLES AND RESPONSIBILITIES

4.1 EMPLOYER

Employers are responsible for ensuring that the requirements of this program are carried out by:

- Providing a safe work environment for all employees;
- Implementing early and safe return to work program and policies that are consistently applied to all employees covered by the program;
- Training all employees about the RTW program;
- Training employees on proper reporting of incidents and the incident investigation process;
- Promptly reporting work-related injuries to the WCB;
- Working with the injured employee and health care professionals to identify suitable work;
- Modifying the workplace, as required, to accommodate employees who are disabled due to illness or injury;
- Monitoring the progress of employees in modified work programs and meeting with them regularly to ensure they will be successful in achieving their return to work goal;
- Contacting the employee as soon as possible after an injury and maintaining communication throughout their recovery and return to work;
- Completing and submitting the **Employer's Report of Injury Form** to the WCB within 72 hours upon notification of an injury/illness. A copy of this form can be found at the end of this RTW Policy and Program;
- Arrange and pay for transportation to a medical facility, if needed (the Business must pay worker's wages for the day of the injury);

4.2 MANAGEMENT

- Ensure employees are complying with modified duties for the assigned period;
- Investigate injuries and work-related complaints;
- Ensure immediate completion of incident reports;
- Meet with the returning employee after the injury to review and discuss any concerns the employee may have;
- Maintain documentation relating to an employee's injury;
- Maintain communication with the employee during their absence from work;
- Liaise with WCB personnel and coordinate the development of the employee's Return to Work Pan; and
- Remind the employee to return with documents after initial medical treatment.

4.3 EMPLOYEES

- Know and follow safety policies and procedures;
- Report any injury or illness immediately to a supervisor or a manager;
- If medical attention is necessary, inform your treating health care professional that early and safe return to work opportunities are available to you to accommodate the functional abilities;
- Communicate with your employer through your recovery period and cooperate with your employer in finding suitable duties for your return to work;
- Take an active role in developing your return to work plan;
- Obtain the necessary documentation from the treating health care professional, as may be required by the employer (for example, Physical Demands Analysis Form);
- Report any concerns with your return to work to your manager and/or WCB adjudicator/case manager so that the concerns can be addressed promptly;
- Attend scheduled return to work progress meetings with your employer/manager; and
- Provide a copy of the Physician's Progress Report Form to your employer/manager.

4.4 Health Care Professionals

- Provide appropriate and effective health care that facilitates recovery and expedites return to work;
- Provide information regarding the injured or ill employee's functional abilities when requested by the Business or the WCB; and
- Provide timely information to the WCB.

4.5 HSR

- Provide assistance with return to work reintegration;
- Address employee concerns regarding modified duties;
- Assist in training employees on the RTW program; and
- Assist in developing/reviewing the RTW program.

4.6 Return to Work Coordinator (Supervisor/Manager)

- Follow up on the progress of the employee's recovery during the RTW Plan;
- Schedule weekly progress meetings with the employee and complete the **Return to Work Progress Report** found at the end of this RTW Policy and Program;
- Assist with achieving the RTW goal;
- Complete the **Return to Work Closure/Evaluation Report**;
- Address any employee issues/concerns during modified duties and the RTW process;
- Support the development, implementation, and delivery of this program by monitoring and reporting on its effectiveness and compliance with applicable legislation; and
- Provide recommendations for improvement.

5.0 RETURN TO WORK PLAN

The primary goal of a RTW plan is to safely accommodate the injured employee back to their regular duties. By assessing the physical demands of the job and the employee's functional abilities, the individual responsible for implementing the return to work plan and the employee can determine if the job requires modification.

If the employee is not able to return to their pre-injury position, the employer is required to accommodate their physical restrictions and provide modified duties to the employee. The accommodation should be suitable and a return to work plan must be implemented.

5.1 PROCEDURE FOR NON-LOST TIME INJURIES

All work-related injuries must be reported to management immediately. All serious injuries and fatalities must be reported to the *Alberta Occupational Health and Safety* 24- hour contact centre as soon as possible.

These steps must be followed by the Business when an injury occurs that does not result in lost time:

1. Provide first aid to the injured worker immediately if needed and begin an incident investigation;
2. Arrange and pay for transportation to a medical facility if needed (the Business must pay the employee's wages for the day of the injury); and
3. Complete and submit the **Employer's Report Form** to the WCB within 72 hours of being notified, if the injury/illness:
    a. Involves health care treatment
    b. Results in time away from work
    c. Results in lost wages

A copy of the **Employer's Report Form** can be found at the end of this Policy.

4. Obtain a copy of the Physician's First Report from the employee when they return to work (same day or next available date);
5. Obtain a copy of the **Worker Report of Injury or Occupational Disease Form** from the employee (if they have filed a claim);
6. Ensure an incident/accident investigation has been completed and documented. Refer to the Accident and Injury Reporting Policy in the previous sections of this manual for a copy of the **Workplace Accident, Injury or Near Miss Reporting Form**;
7. Obtain a copy of the Physician's Progress Report Form from the employee once they are ready to return to work. This form needs to be received before the employee resumes any workplace duties;
8. Collectively discuss and establish a Return to Work Plan with the employee using the **Return to Work Plan Form** found at the end of this Policy and Program;

9. Offer modified duties to the employee using the **Modified Duties/Alternative Work Offer Form** that comply with the physical restrictions listed on the Physical Demands Analysis Form for the indicated time period listed. If there is limited information regarding the worker's abilities or restrictions, please refer to the **Standard Restrictions Form**, a copy of which can be found at the end of this Early and Safe Return to Work Policy and Program; and
10. Monitor and evaluate the employee's recovery. Meet with the employee at least once per week and document their recovery progress using the **Return to Work Progress Report Form** which can be found at the end of this Policy and Program.

The return to work program is completed when the employee is able to return to the regular duties they had prior to the injury. If the employee cannot return to pre-accident duties at the conclusion of the plan, the manager must contact WCB for further assistance/next steps.

5.2 Procedure For Lost Time Injuries

All work-related injuries must be reported to management immediately. All serious injuries and fatalities must be reported to the *Alberta Occupational Health & Safety* 24-hour contact centre as soon as possible.

These steps must be followed when an injury occurs that results in lost time:

1. Provide first aid immediately, if needed and conduct an accident investigation;
1. Arrange and pay for transportation to a medical facility, if needed (the Business must pay the employee's wages for the day of the injury);
2. Contact the employee as soon as possible after the injury. Maintain communication throughout their recovery and return to work; and
3. Complete and submit an **Employer's Report Form** to the WCB within 72 hours of being notified of the injury and if the injury/illness:
    a. involves health care treatment
    b. results in time away/off from work
    c. results in lost wages
4. Obtain a copy of the Physician's First Report from the employee when possible;
5. Obtain a copy of the **Worker Report of Injury or Occupational Disease Form** from the employee (if they have filed a claim);
6. Ensure an incident/accident investigation has been completed and documented. Refer to the Accident and Injury Reporting Policy in the previous sections of this

manual for a copy of the **Workplace Accident, Injury or Near Miss Reporting Form**;

7. Obtain a copy of the Physician's Progress Report Form from the employee once they are ready to return to work. This form needs to be received before the employee resumes any workplace duties;
8. Collectively discuss and establish a Return to Work Plan with the employee using the **Return to Work Plan Form** found at the end of this Policy and Program;
9. Offer modified duties to the employee using the **Modified Duties/Alternative Work Offer Form** that comply with the physical restrictions listed on the Physical Demands Analysis Form for the indicated time period listed. If there is limited information regarding the worker's abilities or restrictions, please refer to the **Standard Restrictions Form**, a copy of which can be found at the end of this Early and Safe Return to Work Policy and Program;
10. Provide copies of any RTW plans or related forms to the employee and the WCB;
11. Monitor and evaluate the employee's recovery. Meet with the employee at least once per week and document their recovery progress using the **Return to Work Progress Report Form** which can be found at the end of this Policy and Program; and
12. Notify the WCB of any RTW disputes and changes to wages, type of accommodations, or length of RTW plan.

The return to work program is complete when the employee is able to return to their pe-injury duties. If the employee cannot return to pre-injury duties at the conclusion of the plan, the manager shall contact WCB for further assistance/next steps.

6.0 TRAINING REQUIREMENTS

The Business will provide training to all employees (including management) on their responsibilities as well as the implementation and application of the program.

7.0 PROGRAM REVIEW

The Business will review this program **annually** to ensure its continued application and compliance with applicable legislation.

HAZARDOUS MATERIALS IN THE WORKPLACE AND WHMIS POLICY

1.0 POLICY STATEMENT

The Business will implement programs, policies, procedures and protocols to ensure compliance with the *Alberta Occupational Health and Safety Act, Regulations and Code* SA 2017, c O-2.1, any successor legislation, and the regulations thereto, as all of them may be amended from time to time (collectively, the "*Act, Regulations and the OHS Code*") and in particular, Part 29 of the OHS Code.

This policy addresses the requirements of *WHMIS* 2015 and is intended to:

- Educate workers on the potential safety and health hazards associated with using, storing, handling and disposing of hazardous products;
- Prevent chemical-related accidents, incidents, injuries and illnesses;
- Increase health and safety awareness in the workplace; and
- Ensure appropriate and accurate labelling and documentation of hazardous products in the workplace.

Without limiting the generality of the foregoing, the Business shall take steps to ensure that:

- All workers are properly trained regarding how to recognize, monitor, handle and limit their exposure to hazardous substances in the workplace;
- Hazardous products and materials are used, handled and stored in the manner prescribed by law;
- All hazardous products and materials are identified and labelled in the manner prescribed by law; and
- Proper policies, procedures and protocols are in place to ensure that proper records and data concerning hazardous materials and products in the workplace are maintained and not tampered with.

2.0 DEFINITIONS

For the purposes of this Policy, the Business adopts the following definitions:

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"Container"	Includes a bag, barrel, bottle, box, can, cylinder, drum, storage tank or similar package or receptacle
"Exposure"	The state of being in contact by inhalation, ingestion, skin absorption or skin contact.
"Hazardous Product"	Any product, mixture, material or substance that is classified in accordance with the *Hazardous Products Regulations* (Canada) in category or subcategory of a hazard class listed in Schedule 2 to the *Hazardous Products Act* (Canada). Hazardous Products usually have one or more of the following intrinsic hazardous properties: • Explosiveness • Flammability • Ability to oxidize (accelerate a fire) • Human toxicity (acute or chronic) • Corrosiveness (to human tissue or metal) • Carcinogenicity • Serious eye damage / eye irritation risk • Health and other hazards not otherwise classified
"Label"	A group of written, printed or graphic information elements that relate to a hazardous product, which is designed to be affixed to, printed on or attached to the hazardous product or the container in which the hazardous product is packaged.
"Supplier"	A person who, in the course of business, sells or imports a hazardous product

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“Precautionary Statement “	Means a phrase that describes the recommended measures to take in order to minimize or prevent adverse effects resulting from exposure to or improper storage/handling of a hazardous product
“Safety Data Sheet (SDS)”	A document that contains information about a hazardous product, including information related to the hazards associated with any use, handling or storage of the hazardous product in a workplace.
“Supplier Label”	A label provided by a supplier that contains the information required by the *Hazardous Products Regulations* (Canada) for that hazardous product.
“Work Site Label”	A label that discloses the following: • a product identifier identical to that found on the SDS for the hazardous product; • information for the safe handling of the hazardous product; and • that an SDS, if supplied or produced, is available

3.0 ROLES AND RESPONSIBILITIES

Everyone present in the Business is responsible for complying with the *Alberta OHS Act, Regulations and Code and WHMIS 2015*. Additional roles and responsibilities are set out below.

3.1 Management

- Provide appropriate training on the use, handling, storage and disposal of hazardous products to all employees who may be exposed to hazardous products;

- Ensure that all hazardous substances at the workplace are stored, labeled and handled properly;

- Ensure that appropriate safe handling procedures and workplace controls are identified and implemented;
- Maintain hazardous substance information, SDS, and labels so that employees are informed of hazardous substances as well as the safe practices, emergency procedures and proper personal protective equipment to be used if applicable;
- Ensure training needs are reviewed with the Health and Safety Representative on an annual basis;
- Provide the Health and Safety Representative with copies of all SDS; and
- Provide copies of SDS to regulatory authorities upon request.

3.2 Supervisory Staff

- Advise all employees of the location of SDS for hazardous products;
- Advise all employees who may be exposed to hazardous products of the hazards such products may present when used in the workplace;
- Ensure appropriate WHMIS training is provided to all employees prior to assigning them to work with hazardous products and keep records of training logs;
- Communicate and enforce safe work procedures and personal protective equipment requirements with workers;
- Ensure that employees do not use hazardous products in the workplace until the SDS has been reviewed and appropriate measures are put in place; and
- Perform routine inspections to ensure requirements of this policy are met.

3.3 Employees

- Complete WHMIS 2015 training;
- Adhere to safe work practices and all provisions of this policy;
- Refrain from using any hazardous products until SDS have been reviewed and appropriate measures have been put in place to minimize risk;
- Report to supervisors any concerns about hazardous products in the workplace; and
- Produce work site labels when required.

3.4 HEALTH AND SAFETY REPRESENTATIVES

- During the monthly workplace inspections, verify that hazardous products are appropriately labelled and that SDS are up-to-date and readily available to all workers;
- Annually, in consultation with management, review the WHMIS training program. If the WHMIS training program is found to be ineffective, recommend retraining the employees and/or amending the training program; and
- Ensure the workplace maintains compliance with all WHMIS 2015 requirements.

4.0 TRAINING REQUIREMENTS

All employees shall be trained in all aspects of WHMIS 2015, which will include, but are not limited to:

- the content required to be on a supplier label and a work site label and the purpose and significance of the information on the label;
- the content required to be on a safety data sheet and the purpose and significance of the information on the safety data sheet;
- procedures for safely storing, using and handling the hazardous product;
- Information on the contents (format) required on a Safety Data Sheet (SDS) and the purpose and significance of the information;
- Where to obtain a copy of the SDS;
- Procedures to be followed when fugitive emissions are present; and
- Procedures to be followed in case of an emergency involving a controlled product.

5.0 HANDLING PROCEDURES

Everyone in the Business must follow required procedures under WHMIS and the Hazardous Products Regulations (Canada).

5.1 SUPPLIER LABELS

- Individuals who supply hazardous products are required to apply a label that meets the requirements of the *Hazardous Products Regulations*.

- A supplier label must include the following information: Product Identified, Initial Supplier Identifier, Pictogram(s), Signal Word, Hazard Statement(s), Precautionary Statement(s) and Supplemental Label Information.
- No employer shall alter a supplier label on a container containing hazardous products.
- If the label applied to a hazardous product or a container of a hazardous product becomes illegible or is removed, the employer shall replace the label with either a supplier label or a work site label.
- When significant new data is received by the employer about a hazardous product, the employer shall, as soon as possible, attach the new information to every relevant supplier label.
- An employer who imports and receives a hazardous product for use in the employer's own workplace, without a supplier label or with a supplier label that does not meet all requirements of the *Hazardous Products Regulations*, shall affix to the product a label that meets the *Hazardous Product Regulations* requirements.
- Supplier labels must be in both official languages in Canada − English and French.

Refer to **WHMIS 2015 Pictogram Table**, in the following pages of this WHMIS Policy for examples of pictograms that will appear on a label.

5.2 Work Site Labels

- A work site label is required if:

  a) A product identifier that is identical to that found on the safety data sheet for the hazardous product;

  b) Information for the safe handling of the hazardous product; and

  c) Reference to the safety data sheet for the hazardous product.

Refer to the **WHMIS 2015 Pictogram Table** in the following pages of this WHMIS Policy for examples of pictograms that will appear on a label.

5.3 Safety Data Sheets (SDS)

Safety Data Sheets (SDS) are summary documents that provide information about the hazards of a product and advice about safety precautions. SDS are usually written by the manufacturer or supplier of the product. In some circumstances, an employer may be required to prepare an SDS (e.g., when the product is produced and used exclusively in that workplace).

SDS provide more detailed hazard information about the product than the label. They are an important resource for workplaces and workers to help you learn more about the product(s) used. Use this information to identify the hazards of the products you use and to protect yourself from those hazards, including safe handling and emergency measures.

SDS tell users what the hazards of the product are, how to use the product safely, what to expect if the recommendations are not followed, how to recognize symptoms of exposure, and what to do if emergencies occur.

SDS must be readily available for the Health and Safety Representative and to workers who are exposed to the hazardous product.

A supplier will provide the SDS, in English and French, to the purchaser of the hazardous product either in hard copy (e.g., by mail, hand delivered, etc.) or by electronic means.

SDS must be updated **within 90 days** of the supplier becoming aware of new information that changes how the hazardous product is classified or the way it will be handled or stored.

Refer to the **Safety Data Sheet Table** for a list of the sections and requirements on an SDS.

5.3.1 Safety Data Sheet Table

Safety Data Sheet Elements
(a)- Identification 3.2 Product identified (e.g., Product name); 3.2 Other means of identification (e.g., product family, synonyms, etc.); 3.2 Recommended use; 3.2 Restrictions on use; 3.2 Canadian supplier identifier - Name, full address and phone number(s); 3.2 Emergency telephone number and any restrictions on the use of that number, if applicable
(b)- Hazard Identification i. Hazard classification (class, category) of substance or mixture, or a description of the Identified Hazard for Physical or Health Hazards Not Otherwise Classified; ii. Label Elements: - Symbol (image) or the name of the symbol (e.g., flame, skull and crossbones); - Signal word; - Hazard statement(s); - Precautionary statement(s) iii. Other hazards which do not result in classification (e.g., molten metal hazard)

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Safety Data Sheet Elements
(c)- Composition/Information on Ingredients i. When a hazardous product is a material or substance: Chemical name; - Common name and synonyms; - Chemical Abstract Service (CAS) registry number and any unique identifiers; - Chemical name of impurities, stabilizing solvents and/or additives*; ii. For each material or substance in a mixture that is classified in a health hazard class**: - Chemical name; - Common name and synonyms - CAS registry number and any unique identifiers; - Concentration. **Note:** Confidential business information rules can apply.
(d)- First Aid Measures: (i) First aid measures by route of exposure: - Inhalation; - Skin contact; - Ingestion; (ii) Most important symptoms and effects (acute or delayed); (iii) Immediate medical attention and special treatment, if necessary.
(e)- Fire-Fighting Measures: (i) Suitable extinguishing media; (ii) Unsuitable extinguishing media; (iii) Specific hazards arising from the hazardous product (e.g., hazardous combustion products); (iv) Special protective equipment and precautions for fire-fighters.
(f)- Accidental Release Measures: (i) Personal precautions, protective equipment and emergency procedures; (ii) Methods and materials for containment and cleaning up.

Safety Data Sheet Elements
(g)- Handling and Storage: (i) Precautions for safe handling; (ii) Conditions for safe storage (including incompatible materials).
(h)- Exposure Controls/ Personal Protection: (i) Control parameters, including occupational exposure guidelines or biological exposure limits and the source of those values; (ii) Appropriate engineering controls; (iii) Individual protection measures (e.g., personal protective equipment).
(i)- Physical and Chemical Properties: (i) Appearance (physical state, colour, etc.); (ii) Odour; (iii) Odour threshold; (iv) pH; (v) Melting point/Freezing point; (vi) Initial boiling point/Boiling range; (vii) Flash point; (viii) Evaporation rate; (ix) Flammability (solid; gas); (x) Lower flammable/explosive limit; (xi) Upper flammable/explosive limit; (xii) Vapour pressure; (xiii) Vapour density; (xiv) Relative density; (xv) Solubility; (xvi) Partition coefficient – n-octanol/water; (xvii) Auto-ignition temperature; (xviii) Decomposition temperature; (xix) Viscosity
(j)- Stability and Reactivity: (i) Reactivity; (ii) Chemical stability; (iii) Possibility of hazardous reactions; (iv) Conditions to avoid (e.g., static discharge, shock, or vibration);

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Safety Data Sheet Elements
(v) Incompatible materials; (vi) Hazardous decomposition products.
(k) Toxicological Information: (i) Concise but complete description of the various toxic health effects and the data used to identify those effects, including: - Information on the likely routes of exposure (inhalation, ingestion, skin and eye contact); - Symptoms related to the physical, chemical and toxicological characteristics - Delayed and immediate effects, and chronic effects from short-term and long-term exposure; - Numerical measures of toxicity
(l) Ecological Information: (i) Ecotoxicity; (ii) Persistence and degradability; (iii) Bio-accumulative potential; (iv) Mobility in soil; (v) Other adverse effects.
(m) Disposal Considerations: (i) Information on safe handling for disposal and methods of disposal, including any contaminated packaging.
(n) Transport Information: (i) UN number; (ii) UN proper shipping name; (iii) Transport hazard class(es); (iv) Packing group; (v) Environmental hazards; (vi) Transport in bulk, if applicable; (vii) Special precautions.
(o) Regulatory Information;

Safety Data Sheet Elements
(i) Safety, health and environmental regulations specific to the product.
(p) Other Information: (i) Date of the latest revision of the SDS****.

5.4 HAZARDOUS PRODUCT INVENTORY

- The Business will complete an inventory of all the hazardous products used or stored on site.
- This inventory must be reviewed and updated annually or as changes are required.
- The most current review date will appear on the inventory list.
- An inventory must be maintained for all the different groups/departments using or storing any type of chemicals.

Refer to the **Hazardous Product Inventory List Form** for an example of a hazardous product inventory.

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WHMIS 2015 Pictogram Table

WHMIS 2015	Type of Hazards
	Gases under pressure (Compressed gas, Liquefied gas, Refrigerated liquefied gas, Dissolved gas)
	Flammables (gases, aerosols, liquids, solids), Pyrophoric (liquids, solids, gases), Self-reactive substances and mixtures, Self-heating substances and mixtures, Substances and mixtures which, in contact with water, emit flammable gases, Organic peroxides
	Oxidizing (liquids, solids, gases)
	Acute toxicity (fatal or toxic via oral, skin, inhalation)
	Carcinogenicity; Germ cell mutagenicity; Respiratory sensitization; Reproductive toxicity; Specific target organ toxicity - single exposure, Specific target organ toxicity - repeated exposure; Aspiration hazard
	Acute toxicity (harmful); Skin irritation; Eye irritation; Skin sensitization; Specific target organ toxicity - single exposure (respiratory irritation or drowsiness or dizziness)
	Corrosive to metals; Skin corrosion; Serious eye damage
	Self-reactive substances and mixtures, Organic peroxides
	Biohazardous infectious materials

WHMIS 2015 does not incorporate the GHS Explosives and Environmental Hazard Classes.		
Explosives	Hazardous to the aquatic environment	Hazardous to the ozone layer
		

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WHMIS 2015 Labels –
Supplier & Work Site Labels

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Hazard Classes Table

Physical Hazard Classes	
Combustible Dusts	Corrosive to Metals
Flammable Aerosols	Flammable Gases
Flammable Liquids	Flammable Solids
Gases Under Pressure	Organic Peroxides
Oxidizing Gases	Oxidizing Liquids
Oxidizing Solids	Pyrophoric Gases
Pyrophoric Liquids	Pyrophoric Solids
Self-Heating Substances and Mixtures	Self-Reactive Substances and Mixtures
Simple Asphyxiants	Substances and mixtures which, in contact with water, emit flammable gases
Physical Hazards Not Otherwise Classified	

Health Hazard Classes	
Acute Toxicity	Aspiration Hazard
Biohazardous Infectious Materials	Carcinogenicity
Germ Cell Mutagenicity	Reproductive Toxicity
Respiratory or Skin Sensitization	Serious Eye Damage/Eye Irritation
Skin Corrosion/Irritation	Health Hazards Not Otherwise Classified
Specific Target Organ Toxicity - Single Exposure	Specific Target Organ Toxicity - Repeated posture

WHMIS 2015 does not incorporate the GHS Explosives and Environmental Hazard Classes.	
Explosives	Hazardous to the aquatic environment
	Hazardous to the ozone layer

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EMERGENCY RESPONSE PLANS AND PROCEDURES POLICY

1.0 POLICY STATEMENT

The Business is committed to complying with all of the provisions contained in the Alberta Occupational Health and Safety Act, the Regulations and OHS Code, SA 2017, c 0-2.1, the Alberta *Ambulance Services Act,* the *Alberta Fire Code*, any successor legislation, and the regulations thereto, as they are amended from time to time.

The Emergency Response Plan is intended to describe preparedness measures, arrangements, support structures, and information channels in place to manage emergency situations that could affect the Business's personnel.

2.0 GENERAL

The Business shall, at all times, maintain emergency preparedness through training, emergency drills, personnel qualifications, instructions, and procedures.

Each emergency shall be reported according to the procedures set out in this policy.

3.0 DEFINITIONS

"Incident"	Any unplanned event that results or could result in injury, illness, or damage to people or property.
"First Aid Provider"	Personnel holding a valid First Aid Certificate or its equivalent.
"Fire Wardens"	Supervisory personnel who is assigned specific duties under the Emergency Response Plan usually restricted to facilitating the evacuation during a fire drill or other emergency.
"Hazard"	Any practice, behaviour, condition, or circumstance or combination of these that could cause injury or illness to people or damage to property, such as completing dangerous work without adequate training, defective machinery, and defective safety equipment, or a near miss.

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"Muster Point"	The meeting place in the event of an evacuation.
"Workplace Violence"	Workplace violence whether at a work site or work-related, means the threatened, attempted or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm, and includes domestic or sexual violence.

4.0 ROLES AND RESPONSIBILITIES

1.1 FIRE WARDENS

- Review the Building Fire Safety Plan;
- Be familiar with the floor area, exits, and the location of firefighting equipment;
- Maintain an updated list of all individuals;
- Assist in the emergency evacuation procedures;
- Participate in fire drills;
- Report hazards;
- Select personnel to assist any persons requiring assistance; and
- Act as a liaison between the fire department and the Business.

1.2 FIRST AID PROVIDERS

- Ensure that **911** is called;
- Upon arriving at the emergency scene, ensure it is safe to enter;
- Provide First Aid to injured personnel;
- Prioritize when dealing with multiple injured patients; and
- Retrieve as much information as possible, including name of patient, presence of bleeding, type of injury/illness, breathing condition, consciousness, and pulse.

1.3 Occupant

- Be familiar with the floor area, exits, and location of firefighting equipment;
- Assist the fire warden in emergency evacuation procedures, as requested;
- Evacuate to the designated muster point for emergency roll call;
- Participate in fire drills and emergency evacuation drills; and
- Report hazards.

1.4 Person requiring assistance (PRA)

- If you are unable to descend the stairs due to a mobility limitation or other reason, advise the person nearest to you that you are a PRA.
- The fire department will assess your safety based on the location of the emergency and will assess whether you require assistance in evacuating.
- If your life will be in danger by not evacuating, then you should be evacuated via the exit stairwells under the supervision of a rescuer and with the help of as many people as necessary to remove you from immediate danger.

For the PRA notice to provide to the building, refer to the **Persons Requiring Assistance Form,** found at the end of this Emergency Response Plans and Procedures Policy.

2.0 PROCEDURES DURING AN EVENT

5.1 When Fire/Smoke is discovered

- Activate building fire alarm system. Remain calm and prepare to evacuate.
- Never try to fight a fire unless you have been trained to use a fire extinguisher; if you have been trained, you should only use the fire extinguisher in the very early stages of the fire.
- Leave the area immediately and remove any persons in immediate danger.
- Close the doors to the affected area.
- Use the stairways (NOT the elevators); if you encounter smoke, then use the alternate stairway.

- Exit from the building via the nearest exit when the alarm sounds (emergency exit floor plan). Meet at the muster point.
- Call **911** and advise them of your building location and floor number.
- Do not return to your floor until the All Clear Announcement is made

5.2 Operating a Fire Extinguisher

To Operate a Fire Extinguisher, Remember the Word "PASS"

Trained personnel who need to use the fire extinguisher must:

1. **Pull** the pin and throw the pin away (twist the pin to break the seal and pull)
2. **Aim** at the base of the small fire (make sure the nozzle is at the base of the fire)
3. **Squeeze** the lever fully – squeeze it fully (right down) to expel the agent
4. **Sweep** at the base of the fire until the fire is extinguished or until the extinguisher is empty.

5.3 When an Alert Signal Sounds

- Remain calm and prepare to evacuate.
- Be prepared to be away from your floor for some time.
- Collect your house and car keys and other items.
- Lock sensitive areas.
- Shut off computers.
- Await instructions from the voice communication system or fire wardens.

5.4 When Fire Alarm Sounds

- Assume emergency evacuation.
- Alert occupants and leave the fire area; take the suite key if it is readily available.

- Before opening any doors, feel the door and doorknob for heat. If they are not hot, brace yourself against the door and open it slightly. If they are hot, use an alternate exit.
- If you see smoke or feel air pressure or a hot draft, close the door quickly and look for an alternative exit or route.
- Evacuate via the stairwells
- Follow the wall to the nearest exit and leave the building.
- Stay away from the building in case debris falls from the building.
- Proceed to the Business's muster point.
- Use the appropriate building exit and report to the muster point for roll call.
- Do not return to the building until the All Clear Announcement is made.

5.5 IF YOU ARE TRAPPED WHEN THE FIRE ALARM SOUNDS

- Return to an office and close the door.
- Seal off all cracks or other openings through which smoke may enter the room.
- If water is available, dampen a cloth and breathe through it to filter out smoke and gases.
- Call **911** and alert them of your address and floor.
- Wait to be rescued and remain calm.

5.6 IN THE EVENT OF A MEDICAL EMERGENCY

- Shout for help. Get the attention of others on the floor. Call for the first aid provider.
- If you are a trained first aid provider, then go to the location of the emergency to assist as needed.
- Call **911**, if necessary.
- If your assistance has not been requested, then stand back and make room for the paramedics to come.

5.7 IN THE EVENT OF A NATURAL DISASTER (EARTHQUAKE, TORNADO, ETC.)

- Drop, cover, and hold on: drop to the floor, take cover under a sturdy desk or table, and firmly hold on.
- Stay away from windows and glass. Do not stand in doorways.
- Stay covered for 30 seconds after the occurrence.
- Be cautious when leaving because of possible exposed electrical wires, broken glass, and unstable walls, ceiling, and fixtures.
- Assist those who may be injured or trapped if safe to do so.
- Do not exit the building unless told to do so.

5.8 IN THE EVENT OF A FLOOD

- Protect all essential documentation and material by placing them on an elevated service. If feasible, erect barriers to stop or reduce the flow of water.
- Follow instructions from the voice communication system.
- Do not cross heavy currents.
- Do not use any electrical outlets or equipment. There may be short circuits due to damaged installation.
- Avoid unprotected electric cables.
- Do not use elevators.

5.9 IN THE EVENT OF MALICIOUS THREATS

Malicious threats include bomb threats or any other type of threat of any nature towards Business personnel. Such threats must be immediately reported to a manager, who will evaluate the situation and act accordingly in coordination with the management team. If evacuation is necessary, follow the fire warden's instructions.

1.10 In the Event of Workplace Violence

1.10.1 Reporting Procedures

- Immediately report the incident to management using the **Workplace Violence and Harassment Reporting Form**, which can be found in the Workplace Violence Prevention Plan and Policy section of this manual.
- If your manager or supervisor committed the incident, report it to a third-party using the **Reporting Contact Form** found at the end of the Workplace Violence Prevention Plan and Policy.
- In the event of an emergency, call **911** as soon as it is safe to do so. All physical assaults as well as any other behaviour (such as immediate or serious threats) that requires police intervention or follow-up must be reported to the police.
- Notify management if a restraining order is in effect or if a non-work-related situation like domestic violence could result in violence in the workplace.

1.10.2 Intervention

- If there is any indication of a violent or potentially violent situation, the Business will intervene as appropriate.
- If a worker is at risk of violence either from within or outside the workplace, a plan will be developed to minimize the risk and respond to any potential emergency.
- If the Business becomes aware of a potential incident of domestic violence, every reasonable precaution will be taken in the circumstances to protect the affected worker.

1.10.3 CORRECTIVE ACTION AND DISCIPLINE

- If the Business determines that a worker has engaged in workplace violence, appropriate corrective action will be taken, up to and including immediate dismissal for cause.
- The Business may require that a worker participate in an anger management program or other forms of counselling.
- If the violent behaviour is that of a non-employee, the Business will take appropriate action to ensure that such behaviour is not repeated. If

necessary, the Business will take measures to prevent the person from returning to the workplace.

- Corrective action will be determined on a case-by-case basis

1.11 In The Event of an Active Shooter

1.11.1 Characteristic of an Active Shooter Situation

- Victims are selected at random.
- The event is unpredictable and evolves quickly.
- Law enforcement is usually required to end an active shooter situation.

1.11.2 What to Do

There are three (3) ways to respond to an active shooter in your vicinity. You must evaluate the situation and make the best decision at the time.

1.11.2.1 Option 1: Hide Out (shelter-in-place)

- Find a safe place and, if possible, hide out of the shooter's view in a room with a lock on the door.
- Barricade/block the entry to your hiding place.
- Lay on the floor away from the door and behind a sturdy object.
- Silence your cell phone.
- Call **911** when safe to do so.

1.11.2.2 Option 2: Evacuate

- Have an escape route and plan in mind.
- Leave your belongings behind.
- Keep your hands visible.
- Call **911** when safe to do so.

1.11.2.3 Option 3: Take Action

- Take action as a last resort and only when your life is in imminent danger.
- Attempt to incapacitate the shooter.
- Act with physical aggression and throw items at the active shooter.
- Call **911** when safe to do so.

1.11.3 How to Respond When Law Enforcement Arrives

- Remain calm and follow instructions.
- Put down any items in your hands (e.g. bags, jackets, etc.).
- Raise your hands and spread your fingers.
- Keep your hands visible at all times.
- Avoid quick movements toward officers; for example, do not hold onto them for safety.
- Avoid pointing, screaming, or yelling.
- Do not stop to ask officers for help or direction when evacuating.

5.11.4 What to Tell 911 When You Call

- Location of the active shooter(s).
- Number of shooters.
- Physical description of shooters.
- Number and type of weapons held by shooters.

3.0 TRAINING

The Business is responsible for training which includes and is not limited to:

- First aid training;
- Use of fire extinguishers training;
- Rescue & Evacuation training; and
- Worker training.

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Training must include exercises appropriate to the work site and simulate the potential emergencies that have been identified. Training must be repeated at intervals for designated workers that have rescue and evacuation duties to ensure they are competent to carry out their duties.

Emergency drills are a very important part of any emergency response plan to provide training and to prove that the plan is working and effective. A record of the drill must be kept on record. Emergency drills will be conducted at least annually or more often if required. Use the **Emergency Drill Report Form** and the **Drill Attendance Form** to document any drills, including fire drills.

4.0 EMERGENCY PROCEDURES

7.1 GENERAL

Emergency preparedness shall be maintained at all times within the workplace in order to handle any emergency situation promptly. The necessary degree of emergency preparedness shall be ensured through training, emergency drills, personnel qualifications, instructions and procedures.

The Business will take steps to ensure that emergency exits, and escape routes are free from obstructions and that all workers are familiar with their surroundings and aware of all available exits and escape routes. The Business will also conduct and keep logs of annual emergency fire and evacuation drills.

The Business will maintain and post in a conspicuous location in the workplace a completed **Emergency Response Information Form** found at the end of this Emergency Response Plans and Procedures Policy. The form will set out, among other things:

- Key personnel names and contact details;
- The names, contact details and work location(s) for the first aid personnel;
- The location of first aid equipment;
- The contact details for the nearest emergency services;
- The address of contact information for the nearest medical facility; and
- The Business's emergency evacuation procedure.

7.2 APPLICATION

The Business's emergency protocols, policies and procedures shall apply to any emergency situation, including, but not limited to:

- Fires;
- Bomb threats;
- Chemical spills or leaks;
- Severe weather incidents;
- Natural disasters; and
- Acute medical events (such as a heart attack or a stroke).

Each emergency occurrence shall be formally reported using the **Emergency Incident Report Form** and if necessary, investigated in line with applicable procedures. A copy of the Emergency Incident Report form can be found at the end of this Emergency Response Plans and Procedures Policy.

7.3 COMMUNICATION

If an emergency situation occurs, management shall notify all workers of the circumstances of the emergency, and to the extent possible, in a manner that does not further endanger the safety of any worker or person, such as by inciting mass panic.

The Business shall ensure that it has in place at all times a global communication system (such as an alarm) capable of carrying out an immediate business-wide evacuation, such as in the event of a fire or gas leak.

Depending on the nature of the emergency, management shall contact the appropriate emergency service, such as the police, fire services, paramedics, hazard control services or hydro or gas line repair services.

7.4 EMERGENCY EVACUATIONS

The Business shall have in place emergency evacuation protocols, policies and procedures to be applied in an emergency that requires an immediate business-wide evacuation, including the following evacuation procedures:

- Activating the appropriate alarm system;
- Exiting the workplace or building using the emergency exit;
- Refraining from using elevators;
- Exiting the workplace or building in an orderly fashion;
- Heading directly to the nearest predetermined assembly point, or if one does not exist, to the nearest safe location;
- Refraining from returning to the workplace under any circumstances; and
- Waiting at the designated assembly point or safe spot until instructed otherwise or unless it is unsafe to do so (for example, if there is severe weather or falling glass, debris or flames).

Each emergency situation occurrence shall be formally reported and investigated in accordance with applicable procedures.

5.0 EMERGENCY COMMUNICATION

The Business will have a means of communication in place at the worksite that allows an injured or ill worker to access first aid services. Communication must allow ambulance or any other means of transportations to be contacted quickly and reliably. Communication can be telephone, cellular phone, port two-way radio or any other means that is effective.

6.0 LOCATION OF EMERGENCY EQUIPMENT

The Business will determine location of the emergency equipment which can be completed by two (2) methods:

1. Complete the Emergency Equipment Section of the **Emergency Contact Information Form** which can be found at the end of this Emergency Response Plans and Procedures Policy; and
2. Development of a basic floor plan (Evacuation Map) of the worksite which identifies locations of emergency equipment such as first aid kits, fire extinguishers, emergency supplies, muster point, etc. and post in conspicuous locations throughout the facility.

7.0 UPDATING THE EMERGENCY RESPONSE PLAN

The Business is responsible for monitoring, implementing, and updating the Emergency Response Plan as often as necessary to ensure validity and relevance based on legislative and organizational requirements.

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DRUG AND ALCOHOL POLICY

1.0 GENERAL

This Drug and Alcohol Policy is directed at protecting the health and safety of employees, customers, contractors and all those that enter the premises of the Business. Employees are made aware of this Drug and Alcohol Policy noted below, upon application for employment, and understands that the policy is not intended to constitute an invasion of privacy, or an attempt to detect matters unrelated to drug or alcohol abuse.

All employees of the Business are responsible for health and safety in the workplace. Occupational health and safety legislation imposes general duties on employers, contractors, and managers/supervisors to provide a safe work environment and take all reasonable precautions to protect the health and safety of employees and others in the workplace. Employees also have obligations under the legislation to protect their own safety and the health and safety of others in the workplace.

It is important to establish boundaries between personal time and work time. Regardless of what an employee does on their personal time, they must report to work and remain fit for duty during their time at work. Being fit for duty becomes particularly important for safety-sensitive roles where workers' actions, decisions and judgements could result in serious incidents and injuries to themselves or others.

It is the policy of the Business to treat all matters pertaining to drug and alcohol on a strictly confidential basis.

1.1 PURPOSE

The purpose of this policy is to outline the responsibilities and expectations associated with workplace impairment and fitness for work. This policy is intended to:

- help ensure the health and safety of employees, contractors, volunteers and apprentices by requiring everyone to be fit for duty,
- establish guidelines for having a workplace that's free from impairment by drugs or alcohol or medications,
- define what workplace impairment means and what it entails; and
- outline the procedures that will be followed in investigating possible violations of the Business's Drug and Alcohol Policy.

1.3 SCOPE

All employees, contractors, visitors, consultants or other individuals working on company property or assignment must comply with this Drug and Alcohol Policy. While the Business has no direct control or direct interest in the personal actions or discipline of its contractor employees or any outside vendors, these persons can affect its employees, property and reputation.

Any employee, contractor consultant or vendor found or suspected to be in violation of this Policy will be dealt with through the appropriate measures and may be denied access to the job site or work assignments until the completion of an investigation.

Subject to any overriding obligations at law (such as a duty to accommodate a disability), any worker who violates this policy by either reporting to work impaired, becoming impaired at work or working while impaired is guilty of serious workplace misconduct and can be subject to severe disciplinary action including immediate dismissal for cause.

2.0 DEFINITIONS

“Drug Testing”	A test that examines a person's blood, urine, breath, saliva, or other sample to determine the presence of impairing substances in the body.
“Fit for Work”	Refers to an employee’s ability to maintain a physical, mental, and emotional state that enables them to perform the physical and mental demands of their job and/or duties safely, effectively, and in a manner that does not increase risk to themselves and others. This includes being free from impairment by alcohol or drugs, the misuse of and/or failure to take medications as prescribed, and/or any condition that could impair a person’s ability to work safely.
“HSR”	Health and Safety Representative
“Illegal Drugs”	Drugs or controlled substances such as cocaine, crack, ecstasy, heroine and other illegally obtained drugs.

"Impairment" or "being impaired"	Means that a worker's normal physical or mental abilities, or faculties, while at work have been detrimentally affected by the use of substances (legal or illegal, ***including cannabis***), as determined by the Business in its sole discretion. Without limiting the generality of the foregoing, "impairment" includes the inability to safely, competently or efficiently perform work duties.
"Legal Drugs"	Drugs that are either prescribed by a doctor or purchased over the counter and used as instructed such as pain relievers like acetaminophen (Tylenol), ibuprofens like Advil or Aleve and antihistamines like Claritin or Benadryl.
"Safety-Sensitive Position"	Position where some or all of the work duties and operational processes have the potential, if performed improperly, for a serious incident or near miss. A safety-sensitive position includes positions where only certain duties are safety-sensitive.
"Serious Incident or Near Miss"	Refers to an unplanned event, circumstance or condition that caused or had a high likelihood to cause damage or injury to person, property, reputation, security or the environment, and/or would result in a report to a municipal, provincial, or federal regulator.

1.0 ROLES AND RESPONSIBILITIES

1.1 MANAGEMENT

Management must:

- Ensure a safe work environment as per the requirements of the *Alberta OHS Act, Regulations and OHS Code*
- Educating workers about this Drug and Alcohol Policy

- Treat impairment as a work site hazard and putting in appropriate control measures in place.
- Be knowledgeable of the content of this Policy.
- Pro-actively respond to any reported or suspected violations of this guideline in a consistent and fair manner.
- Notify Human Resources of any employee found to be in violation of this Policy.
- Immediately send any employee home by taxi or another safe means of transportation - who reports to work under the influence of alcohol or drugs.
- Document any incidents of substance abuse.
- Maintain the confidentiality of the individuals concerned, except where disclosure is necessary for the purposes of investigating the situation or taking disciplinary measures in relation to the incident if discipline is being imposed.

1.2 WORKERS

Workers must:

- Take responsibility for their own safety and the safety of others by ensuring that they do not report to work or engage in any work while impaired by drugs, alcohol or other substances (***legal or illegal***) which may cause impairment, ***including cannabis***.
- Disclose any problems they are experiencing with an alcohol or drug dependency to their supervisor or manager.
- If undergoing prescribed medical treatment with drugs that could impair their performance report this treatment immediately to their immediate supervisor or manager.
- Be fit for duty and in a condition to carry out their assignments and responsibilities.
- Ensure when they are using a prescription or over-the-counter products, that these products don't affect work performance by altering the mind, mood, behavior, emotions, reasoning performance or physical job functions.
- Refrain from the use, possession, transfer, or sale of any illegal substance on the Business's premises.

3.0 APPLICATION OF THE POLICY

Any worker who reports to work impaired will not be allowed to work and any worker who is found to be impaired while working will not be allowed to continue working.

If, in the sole opinion of the Business, a worker is deemed seriously impaired, the worker shall be sent home (with pay amounting to the three (3) hour minimum as per Alberta Employment Standards Code), and if it is necessary to ensure the worker's safety, as determined by the Business, he or she will be sent home by taxi or another safe means of transportation. An impaired worker will not be allowed to drive or operate any equipment or machinery under any circumstances.

If a worker is involved in the use, possession, transfer, or sale of an illegal substance in the workplace, management may notify the appropriate authorities.

Management may also deem it necessary to report a worker's illicit conduct outside of work if it presents the potential to cause a risk of harm to workers within the workplace.

3.1 Safety Sensitive Positions

Safety sensitive positions, as defined by Canadian Human Rights Commission in 2017, if not performed in a safe manner, can cause direct and significant damage to property, and/or injury to the employee, others around them, the public and/or the immediate environment.

Because of the greater risk involved in performing certain functions, some positions within the Business may be designated as safety sensitive positions and as such, may be subject to additional requirements including pre-employment or post incident drug and alcohol screening. Furthermore, in addition to reporting and remaining fit for duty and complying with the other provisions of this Policy, any worker in a safety sensitive position who is required to take prescription medication that may result in his or her impairment, must report this to his or her supervisor or manager.

4.0 DRUG AND ALCOHOL SCREENING

Employees of the Business may be required to undergo drug and alcohol screening under the following circumstances:

- Reasonable suspicion drug and alcohol screening
- Pre employment screening for safety sensitive positions
- Post Significant incident or a Potentially Serious Incident (PSI)

4.1 Reasonable Suspicion Drug and Alcohol Screening

A supervisor or manager, who has reasonable grounds to believe, based on observation of a worker's conduct or other indicators (appearance, behavior, speech, body odours) that the worker is or may be unfit to work in a safe manner because of the use of drugs and/or alcohol may request, after consultation with a HSR and a Human Resources Representative, the worker to submit to a drug and alcohol test and must explain to the employee why the request is being made.

The Business may also require drug and alcohol screening as part of an investigation into a serious incident or near miss where impairment is a suspected cause.

4.2 Pre-employment

As a condition of employment, all individuals applying for a Safety Sensitive Position with the Business may be required to successfully pass a drug and alcohol screening before starting employment with the Business.

4.3 Post Significant incident or a Potentially Serious Incident (PSI)

One or more workers involved in a significant incident or a PSI (near miss) that may be required to submit to a drug and alcohol screen immediately following the incident, if the a supervisor or a manager, after consultation with a HSR, concludes that there are reasonable grounds to suspect that the use of drugs or alcohol was a contributing factor of the incident or the PSI.

4.4 Consequences Of Positive Results

The company will not permit any worker to perform safety-sensitive functions, if it has been determined that worker has violated this Drug and Alcohol Policy.

A worker may refuse to participate in this policy and the refusal shall be considered a refusal to accept the Business's terms and conditions of employment and could be interpreted as the worker's resignation from his or her employment.

Any worker who fails to fulfil the requirements of this policy may be subject to discipline and/or up to and including termination of employment and prosecution if appropriate.

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PROGRESSIVE DISCIPLINE POLICY

The following progressive discipline process will, where appropriate, be carried out with the intent of promoting a safe and healthy workplace.

1.1 IDENTIFICATION OF PERFORMANCE ISSUES

A worker's supervisor, or alternatively, the Business's management, shall be responsible for promptly identifying and promptly responding to any unsafe conduct by the worker. This includes, but is not limited to, any violations of the Business's health and safety program, policies, procedures and protocols, including this policy.

Before initiating this progressive discipline process, the worker's supervisor or management, as the case may be, shall first communicate the Business's expectations to the worker – and in particular, the importance of health and safety compliance – both verbally and in writing so that: (i) the worker is fully aware of the health and safety standards expected of him or her; and (ii) that failure to comply with those standards will result in discipline.

1.2 PROGRESSIVE DISCIPLINE

If a worker's conduct continues to fall short of acceptable standards, or if the worker commits a serious initial violation of the Business's health and safety program, policies, procedures and protocols, including this policy, as determined by the Business in its sole discretion, then management will initiate the Business's progressive discipline process, as explained in detail below.

1.2.1 Step One: Verbal Warning

The worker's supervisor or a member of management shall meet privately with the worker to discuss his or her conduct and warn the worker that failure to correct his or her conduct could lead to further discipline up to and including immediate dismissal for cause. The supervisor or management representative shall discuss with the worker ways to bring about improvements in the worker's conduct and health and safety compliance and schedule a follow-up interview date.

If management determines that is the verbal warning is appropriate, the worker will be placed on a performance improvement plan with the aim of helping the worker correct his or her conduct.

1.2.2 Step Two: Written Warning

If a worker's performance does not improve following Step 1, then the worker will receive a written warning that his or her continued misconduct could lead to further disciplinary action up to and including dismissal for cause. The worker's supervisor or a member of management will again discuss with the worker ways to bring about improvements in the worker's conduct and schedule a second follow-up interview date.

If management determines that it is appropriate, the worker will be placed on a new or updated performance improvement plan with the aim of helping the worker correct his or her behaviour.

1.2.3 Step Three: Dismissal

If the worker's misconduct continues after Step 2, then the worker will be dismissed for cause.

1.3 Exception for Serious Misconduct

The Business may elect to dismiss a worker prior to carrying out any or all of the steps set out in subsection 1.2 (Progressive Discipline) if the Business determines that a worker has engaged in serious misconduct, including engaging in conduct that presents a serious risk to the health and safety of other workers.

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MENTAL HEALTH POLICY

1.0 POLICY STATEMENT

The Business is committed to protecting the health, safety, and welfare of its employees. The Business is also committed to complying with applicable health and safety and human rights legislation.

The intent of the Mental Health Policy (the "Policy") is to establish, promote, and maintain a workplace environment that supports and promotes the mental well-being of all employees.

2.0 SCOPE

This Policy applies to all employees of the Business.

3.0 MENTAL HEALTH IN THE WORKPLACE

There are many factors that affect the mental health and well-being of employees in the workplace. The Business is committed to understanding and addressing such factors and promoting and creating a workplace culture where employees are able to discuss mental health concerns or report difficulties without fear of discrimination or reprisal.

To promote the creation of a healthy work environment for employees, the Business will do the following:

1. Set realistic employee performance expectations and targets;
2. Ensure all employees have clearly defined job descriptions, objectives, and responsibilities and provide them with support, appropriate training, and adequate resources to do their job;
3. Manage conflict between employees to ensure the workplace is free from bullying, harassment, and discrimination;
4. Provide proactive support to individual employees who experience mental health issues;
5. Maintain confidentiality about individual employee's concerns and mental health issues; and
6. Identify all workplace stressors and conduct risk assessments to eliminate stress or control the risks from stress.

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4.0 ROLES AND RESPONSIBILITIES

1.1 EMPLOYER:

- Ensure that all employees are aware of this Policy and the process for seeking assistance for mental health issues;
- Inform employees on how to report workplace violence/harassment issues to management and/or Human Resources;
- Provide a workplace that supports and promotes the mental well-being of all employees;
- Ensure implementation of this Policy in the workplace; and
- Review the effectiveness of this Policy.

1.2 MANAGEMENT:

- Ensure employees are fully trained to perform their job duties and are provided with professional development opportunities, if possible;
- Monitor workloads, overtime requirements, and vacation schedules;
- Actively investigate employee disputes and workplace violence/harassment incidents;
- Provide reasonable accommodation and support return to work initiatives; and
- Manage the implementation of this Policy.

1.3 EMPLOYEES:

- Raise issues or concerns to management or the HR/health and safety team;
- Understand this Policy and support fellow co-workers in the awareness of this Policy; and
- Contribute to an overall healthy work environment.

5.0 REVIEW OF THE POLICY

The Business shall review this Policy annually and shall ensure its continued compliance with applicable legislation.

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ANNUAL PROGRAM AND POLICIES REVIEW FORM

AN ANNUAL REVIEW OF THE HEALTH AND SAFETY PROGRAM AND POLICIES WAS COMPLETED ON _________________________________ (DATE OF REVIEW).

Were any revisions made to the Health and Safety Program and Policies?

Yes ☐ No ☐

If yes, list them here ____

____

____

____

____

____

____

____

Acknowledgement

____________________________ ____________________________

Name of the lead Reviewer Signature of the lead Reviewer