

Internal Health and Safety Program

Spectrum Investigation & Security (1998) Limited

Revised April 2021



Health and Safety Manual 2021

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# Health & Safety Policy

Spectrum Investigation and Security (1998) Limited, as the employer, is ultimately responsible for a worker’s health and safety. Our objective is to protect all our workers from injury and/or illness.

Spectrum Investigation and Security (1998) Limited is committed to taking every reasonable precaution for the protection of all workers and to uphold the requirements under the *Newfoundland and Labrador Occupational Health and Safety Acts and Regulations.* To fulfill this commitment, the company will make every effort to provide and maintain a safe and health workplace by implementing an Occupational Health and Safety Program, adhering to acceptable industry standards, and complying with all applicable legislation. In keeping with occupational health and safety legislation, a healthy and safe workplace will be accomplished in consultation with management and employees and through a commitment to our occupational health and safety committee.

Supervisors shall be held accountable for the health and safety of workers under their supervision. Responsibility includes ensuring that all equipment is safe and that workplace practices follow established legislation, work practices and procedures. To protect the health and safety of workers, supervisors must ensure adequate safety training is performed.

Every worker must protect his/her health and safety and the health and safety of other workers by working in compliance with legislation and established workplace practices and procedures. All employees of Spectrum Investigation and Security are expected to operate according to legislative requirements using best practices and following the Company’s policies and procedures regarding health and safety.

Our Occupational Health and Safety Committees are responsible for providing information and addressing safety concerns and issues of both management and employees.

The safety information in this policy does not take precedence over the Provincial Occupational Health and Safety Act and Regulations. Spectrum Security will follow all regulations as stated in the Occupational Health and Safety Acts and Regulations.

This policy will be reviewed on an annual basis and revised, as necessary.



# 1.1 Roles and Responsibilities

All personnel have a key role in the identification, implementation enforcement and management of health and safety program on all sites. All employees will be made aware of their roles in promoting and implementing a healthy and safe workplace.

Employer

Where it is reasonably practicable:

* Provide and maintain a workplace and the necessary equipment, systems and tools that are safe and without risk to the health of his or her workers.
* Provide the information, instruction, training and supervision and facilities that are necessary to ensure the health, safety, and welfare of his or her workers.
* Shall ensure that his or her workers, and particularly his or her supervisors, are made familiar with health or safety hazards that may be met by them in the workplace.
* Conduct his or her undertaking so that persons not in his or her employ are not exposed to health or safety hazards because of the undertaking.
* Shall ensure that his or her workers are given operating instruction in the use of devices and equipment provided for their protection; and
* Shall consult and co-operate with the occupational health and safety committee, the worker health and safety representative or the workplace health and safety designate, where the employer is not the workplace health and safety designate, on all matters respecting occupational health and safety at the workplace.

Supervisors:

* Advise workers under his or her supervision of the health or safety hazards that may be met by them in the workplace.
* Provide proper written or oral instructions regarding precautions to be taken for the protection of all workers under his or her supervision; and
* Ensure that a worker under his or her supervision uses or wears protective equipment, devices, or other apparel that this Act, the regulations, or the worker’s employer requires be using or wearing.

Workers

* Co-operate with his or her employer and with other workers in the workplace to protect.
  + his or her own health and safety,
  + the health and safety of other workers engaged in the work of the employer,
  + the health and safety of other workers or persons not engaged in the work of the employer but present at or near the workplace.
* Use devices and equipment provided for his or her protection in accordance with the instructions for use and training provided with respect to the devices and equipment.
* Shall consult and co-operate with the occupational health and safety committee, the worker health and safety representative or the workplace health and safety designate at the workplace.
* Co-operate with a person exercising a duty imposed by this Act or regulations.
* Comply with all policies, procedures, current regulations, and best practices while performing duties.
* Participate in a part of safety that may be requested by the supervisor, OHS Committee or employer.
* Report all unsafe acts or conditions onsite immediately to the supervisor; and
* Immediately report all incidents, injuries, and near misses to the supervisor.

On-Site OHS Committee

* Seek to identify aspects of the workplace that may be unhealthy or unsafe.
* Participate in a workplace inspection that an employer is required by the regulations to conduct.
* May make recommendations to principal contractors, employers, workers, self-employed persons and the assistant deputy minister or an officer for the enforcement of standards to protect the health, safety, and welfare of workers at the workplace.
* Receive complaints from workers as to their concerns about the health and safety of the workplace and their welfare.
* Establish and promote health and safety educational programs for workers.
* Maintain records as to the receipt and disposition of complaints received from workers under paragraph (c).
* Co-operate with the assistant deputy minister or an officer who is exercising his or her duties under the Act; and
* Perform those other duties and follow those procedures that may be prescribed by the regulations.

|  |  |
| --- | --- |
| Assignment of Responsibility and Accountability for Safety  **\*Manager**   * Establish a safety policy. * Provide a safe workplace. * Maintain a safety program. * Ensure proper training for workers. * Ensure PPE is available. * Ensure regular inspections are completed. * Correct unsafe conditions. * Provide first aid. * Investigate accidents. * Report injuries to WHSCC. * Ensure compliance with regulations. * Set a good example.   **\*Occupational Health & Safety Committee/Workplace Health & Safety Designate/Worker Health & Safety Committee**   * Identify unsafe conditions. * Participate in investigations. * Make recommendations. * Receive complaints. * Establish and promote training. * Maintain records. | **\*Supervisor/Crew Chief**   * Promote safety awareness. * Establish safe work practices. * Instruct workers. * Correct unsafe practices. * Detect troubled employees. * Correct unsafe conditions. * Enforce safety rules. * Inspect for hazards. * Investigate all accidents. * Ensure proper maintenance. * Comply with regulations. * Set a good example.   **\* Worker**   * Use safe work practices. * Report unsafe conditions. * Correct unsafe conditions. * Report unsafe acts. * Report and injury * Comply with rules and regulations. * Make safety suggestions. * Set a good example. |

# 1.2 Legislative Rights

Workers have three basic rights when it comes to the health and safety of themselves.

## 1.2.1 Right to refuse to unsafe work.

*Occupational Health and Safety Act section 45*

Workers have the basic right to refuse work that they feel is unsafe.

**45.** (1) A worker may refuse to do work that the worker has reasonable grounds to believe is dangerous to his or her health or safety, or the health and safety of another person at the workplace.

(a) until remedial action has been taken by the employer to the worker's satisfaction.

(b) until the committee or worker health and safety Committee has investigated the matter and advised the worker to return to work; or

(c) until an officer has investigated the matter and has advised the worker to return to work.

(2) she normally performs, and the worker shall accept the Where a worker refuses to do work under subsection (1) his or her employer may reassign the worker to other work that is reasonably equivalent to the work he or reassignment until he or she is able to return to work under subsection (1).

(3) Where a worker is reassigned to other work under subsection (2) the employer shall pay the worker the same wages or salary and grant him or her the same benefits the worker would have received had the worker continued in his or her normal work.

(4 )Where a worker has reasonably refused to work under subsection.

(1) and has not been reassigned to other work under subsection (2) the employer shall pay the worker the same wages or salary and grant the worker the same benefits the worker would have received had the worker continued to work, until he or she is able to return to work under subsection (1).

(5) A reassignment of work under subsection (2) is not discriminatory action under section 49.

## 1.2.2 Right to Participate.

Workers have the basic right to participate in any matter that may influence their health and safety. Workplace committees are responsible for ensuring that employees are represented in health and safety matters.

## 1.2.3 Right to Know.

Employees have the right to know about any factors in their employment that may affect their health and safety, including hazardous substances, hazardous work areas and hazardous machinery.

Through their workplace committee, employees have the right to access government or employer reports relating the health and safety of employees.

Employees do not have the right to access medical records, except with the consent of the party involved.

A copy of the Act and regulations under the Act are easily accessible to an employee.

# 1.3 Occupational Health and Safety Acts and Regulations

*Occupational Health and Safety Act section 25(1d)*

A copy of the Act and regulations under the Act are easily accessible to all employees.

# 1.4 Internal Responsibility System

The goal of the internal responsibility system is to have all employees working together to identify and control situations (hazards) that could cause harm. Its ultimate objective is to ensure everyone integrates health and safety into their work. It is the foundation of the *Occupational Health and Safety Act.*

The word 'internal' in the internal responsibility system refers to both internal to each workplace as well as internal to each individual employee at that workplace. There are many advantages to recognizing and adopting the internal responsibility system:

* It places responsibility for controlling hazards on those in the workplace, making everyone a contributor to workplace health and safety.
* It applies everyone's knowledge to improve health and safety.
* It is better suited to developing solutions for each workplace than traditional "command and control" systems.
* It encourages management and workers to take joint action to identify and control hazards through co-management of health and safety.
* Properly handled, it promotes cooperation and motivates everyone to protect their health and safety and that of their fellow workers.

The internal responsibility system emphasizes cooperation because all employees should have the same objective - to improve health and safety. Although everyone at a workplace has shared responsibility for health and safety, the individual responsibilities are complementary, not identical. The individual duties of a manager are different from the individual duties of a supervisor, which in turn are different than the individual worker fulfilling his or her duties; but taken together, a safe and healthy workplace can be achieved. Everyone in the workplace is accountable for occupational health and safety.

# 1.5 Due Diligence

The idea of due diligence is closely related to the concept of the internal responsibility system. Due diligence means, anyone with responsibility for health and safety must "... take every precaution reasonable in the circumstances to avoid a work-related injury or illness."

Taking "reasonable care" holds individuals accountable for their acts and omissions. This may go well beyond "regulatory compliance". Due diligence includes the following ideas:

* Reasonably practicable - a high standard where a person is doing his or her best job, acting with common sense and taking reasonable care.
* Degree of risk - the approach required depends on the degree of risk. The higher the risk, the greater the safety measures that must be taken.

The responsibility for maintaining a safe and healthy workplace comes with the right to have a safe and healthy workplace as prescribed in the Occupational Health and Safety legislation. Everyone is accountable (as an individual) for carrying out their responsibilities. The greater the authority, the greater the accountability. While an individual with formal authority in a workplace may delegate responsibility and authority to others to perform certain work, he or she cannot delegate their accountability to ensure the work is carried out safely. The introduction of Bill C-45 on March 31, 2004 extends accountability to a new level, that of a crime with a permanent criminal record. This bill establishes criminal liability for a wide range of organizations and individuals when they fail to take reasonable steps to prevent workplace accidents. It extends individual legal liability to all persons directing work in a workplace, including foremen, superintendents, directors, and even co-workers.

In general terms, the Occupational Health and Safety legislation prescribes the following major duties for management, supervisors, workers, and committees/Committees:

Management is responsible for:

* Providing a safe and healthy workplace including the necessary equipment systems, and tools which are properly maintained.
* Providing information, training, instruction and supervision, and facilities to protect the health and safety of workers.
* Establishing, supporting, and consulting with Occupational Health and Safety committees and Workplace Health and Safety Committees on all matters to improve workplace.
* Health and safety including regular safety inspections of the workplace.

Supervisors are responsible for:

* Knowing and complying with health and safety requirements
* Ensuring workers under their direction know and comply with health and safety requirements.
* Ensuring workers under their direction receive adequate supervision.

Workers are responsible for:

* Cooperating with management, supervisors, and the Occupational Health and Safety committee or Workplace Health and Safety Committee
* Following safe work practices and procedures and using safeguards and personal protective equipment
* Reporting hazards (such as unsafe situations and activities) to their supervisor immediately.

Occupational Health and Safety committees are responsible for:

* Seeking to identify aspects of the workplace that may be unhealthy or unsafe participating in workplace inspections.
* Receiving complaints from workers as to their concerns about health and safety in the workplace
* Making recommendations to management to protect the health, safety, and welfare of workers at the workplace.
* Establishing and promoting health and safety educational programs for workers.

As a legal defense, due diligence is important for a person charged under Occupational Health and Safety legislation. Under the legislation, anyone can be charged. This can include the worker, supervisor, manager, director, executive or even the Minister. It is also noted that more than one person can be charged for the same offense.

If charged, a person may be found not guilty if they can prove that due diligence was exercised. The defendant must be able to prove that all precautions, reasonable under the circumstances were taken to protect the health and safety of workers.

# 2.0 Occupational Health and Safety Committee Policy

Spectrum Investigation and Security (1998) Limited recognizes the valuable contribution made by the Joint Occupational Health and Safety committees toward maintaining safe and healthy workplaces. Committees play an integral part in the company’s inspection program, hazard identification and control program, development of safe work practices and procedures, as well as identifying training and education needs and promoting safety awareness programs. As a committee has direct involvement with the day-to-day operations of their workplace, they are in a good position to recognize essential problems and make practical recommendations. Management actively seeks their advice on the best ways to prevent workplace accidents.

As a demonstration of its commitment to working with Occupational Health and Safety committees toward the common aim of improving workplace health and safety, Spectrum Security will provide support in the following ways:

* Physical support will include:
  + Clerical support and supplies
  + Meeting room
  + Documentation and information resources
* Provide committee/Committee training to meet or exceed the standards prescribed by Workplace Health, Safety and Compensation Commission.
* A copy of the minutes and written recommendations from committee meetings will be reviewed by management.
* Management will respond in writing to all committee recommendations within 30 days.
* Committees will have provided by management, all the equipment, materials, and supplies necessary to conduct periodic safety inspections.

Copies of all relevant documents pertaining to health and safety will be provided to the committee. These may include documents such as accident investigation reports, health and safety audit reports, and the reports of special health and safety related consultants. The only health and safety reports which may be withheld from the committee are those which are prescribed as confidential in the *Occupational Health and* *Safety Act* or Regulations, such as personal medical records of individual workers.

The committee will hold special meetings as required to formulate recommendations pertaining to work refusals where the matter was not settled to the worker's satisfaction at a previous stage.

# 2.1 Conditions and Requirements to Establish Occupational Health and Safety Committees

As per *Occupational Health and Safety Act* section (37-40)

The *Occupational Health and Safety Act* and Regulations requires employers to establish Occupational Health and Safety committees at workplaces with 10 or more workers at workplaces with between 2 and 9 workers. The size of the committee must be agreed upon by the employer and the workers. However, it must consist of at least two persons and not more than 12. There may be an equal number of management and labor committee members, but the number of management members cannot exceed the number of labor members.

Meetings:

* The committee will meet every 3 months.
* When and if incident/accident investigation is needed.
* Each member of the committee is required to attend each of the meetings.
* The minutes will be recorded and be posted and passed out as stated above.

Training:

* All members shall be trained as per Workers Compensation Commission committee requirements.

Duties of Members:

* Shall seek to identify aspects of the workplace that may be unhealthy or unsafe.
* Shall participate in a workplace inspection that an employer is required by the regulations to conduct.
* May make recommendations to principal contractors, employers, workers, self-employed persons and the assistant deputy minister or an officer for the enforcement of standards to protect the health, safety, and welfare of workers at the workplace.
* Shall receive complaints from workers as to their concerns about the health and safety of the workplace and their welfare.
* Shall establish and promote health and safety educational programs for workers.
* Shall maintain records as to the receipt and disposition of complaints received from workers.
* Shall co-operate with the assistant deputy minister or an officer who is exercising his or her duties under the Act.
* Shall perform those other duties and follow those procedures that may be prescribed by the regulations.

Management members of a committee may be appointed by management of the workplace. Worker members of the committee must be elected by their co-workers. At the first committee meeting, the committee must elect two co-chairpersons, one to serve as the management co chairperson and the other to serve as the worker co-chairperson.

The names of Occupational Health and Safety committee members or the Workplace Health will be posted on the Occupational Health and Safety board in lunchroom. Committees must meet a minimum of once every three months or when it is requested or required due to an incident/accident or incident/accident investigation.

Minutes of each meeting must be recorded, and a copy of the minutes must be distributed as follows:

* One copy posted at the workplace on OH&S board
* One copy kept on the committee’s files.
* One copy sent to the Workplace Health, Safety and Compensation Commission

# 2.2 Responsibilities of an Occupational Health and Safety Committee

The duties and responsibilities of Occupational Health and Safety committees and Workplace Health and Safety Committees are prescribed in the *Occupational Health and Safety Act* as follows:

## 2.2.1 Committee Training

38.1 (1) Where 50 or more workers are employed at a workplace, the employer shall provide and pay for training for the members of the occupational health and safety committee at the workplace.

(2) Where 10 to 49 workers are employed at a workplace, the employer shall provide and pay for training for the co-chairpersons of the occupational health and safety committee at the workplace.

(3) The training provided under subsections (1) and (2) shall meet the requirements the Workplace Health, Safety and Compensation Commission may set.

(4) A member of the committee who is provided training under subsection (1) or (2) shall participate in the training.

(5) An employer shall compensate a worker for participating in training under this section as if the training were regular work.

## 2.2.2 Duties of Committees

39. A committee established under section 37

(a) shall seek to identify aspects of the workplace that may be unhealthy or unsafe.

(a.1) shall participate in a workplace inspection that an employer is required by the regulations to conduct.

(b) may make recommendations to principal contractors, employers, workers, self-employed persons and the assistant deputy minister or an officer for the enforcement of standards to protect the health, safety, and welfare of workers at the workplace.

(c) shall receive complaints from workers as to their concerns about the health and safety of the workplace and their welfare.

(d) shall establish and promote health and safety educational programs for workers.

(e) shall maintain records as to the receipt and disposition of complaints received from workers under paragraph (c).

(f) shall co-operate with the assistant deputy minister or an officer who is exercising his or her duties under the Act; and

(g) shall perform those other duties and follow those procedures that may be prescribed by the regulations.

## 2.2.3 Meetings of Committee

40. Meetings of a committee shall take place during regular working hours at least once every 3 months and a worker is not to suffer loss of pay or other benefits while engaged in a meeting of a committee.

## 2.2.4 Accident/Incident Notifications

Pursuant to section 54(2) of the *Occupational Health and Safety Act,* the department must notify the Occupational Health and Safety committee immediately of the occurrence of:

## 2.2.5 Reporting Accidents

54. (1) where an accident takes place at a workplace

(a) That results in serious injury to a person or results in the death of a person; or

(b) That had, or continues to have, the reasonable potential of causing serious injury to or the death of a person

The employer or principal contractor shall immediately notify the assistant deputy minister of the accident.

(2) Where an accident is reported under subsection (1), notification shall immediately be given to the committee, the worker health and safety Committee or the workplace health and safety designate.

## 2.2.6 Unsafe Work Refusal Investigations

The committee have the right to investigate all aspects of the work refusal, including interviewing the worker invoking the work refusal as well as other workers involved in the work, examine relevant documents, contact suppliers, or make any other additional inquiry it sees fit prior to making a recommendation regarding the work refusal.

If the committee decided not to uphold the worker's refusal, it must notify both the worker and the employer of its decision in writing. If the committee decides to uphold the work refusal, the recommendation for corrective action must be given to the workplace management and the worker informed of its recommendation. If the workplace management does not take the necessary corrective action within a reasonable period, the committee or Committee must report the matter to the Department of Government Services for final resolution.

# 2.3 Terms of Reference

It is our belief that, through education programs, investigation of problems and resolutions of these problems, the workplace will be healthy and safe for all employees. We acknowledge that proper functioning of the health and safety committee can only be carried out where representatives of both the employer and workers are committed to these responsibilities. We adapt these guidelines in good faith and agree to promote and assist the health and safety committee whenever possible.

For the employer \_\_\_Damon Sweeney\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_December 12, 2020 \_\_

For the workers \_\_\_\_Nathan Lockyer\_\_\_\_\_\_ Date: \_\_\_March 26, 2019\_\_\_

**1. Name of Committee**: Spectrum Investigation and Security (1998) Ltd

**2. Composition of Committee**:

The health and safety committee will consist of \_\_5\_\_ members as follows:

\_\_2\_\_\_ Management representatives

\_\_3\_\_\_ Worker representatives

**3. Purpose of the Committee**:

This is a joint committee made up of worker and employer representatives consulting in a cooperative spirit to identify and resolve health and safety problems in support of a planned occupational health and safety program in the place of employment.

**4. Functions of the Committee**:

* Make recommendations for the establishment of health and safety policies and procedures.
* Identify aspects of the workplace that are unsafe and recommend corrective action.
* Help to identify and resolve the health and safety concerns of workers.
* Receive and distribute health and safety information to workers and employers.
* Participate in workplace inspections; and
* Maintain records regarding the complaints received and the resolution of those complaints.

1. **Records**:

The committee will keep accurate records of all matters that come before it.

1. **Meetings**:

* The committee will meet at least once every three months.
* Special meetings, if required, will be held at the call of the Chair.
* A quorum shall consist of most members.

1. **Agenda and Minutes**:

* An agenda will be prepared by the chair and distributed to all members prior to the meeting.
* All items raised on the agenda and in meetings will be dealt with based on consensus.
* All items will be reported in the minutes. Unresolved items will continue to be reported in the minutes and placed on the agenda until such time as they are considered complete.

1. **General Provisions**:

* All workers are encouraged to discuss their problems with their immediate supervisor before bringing them to the attention of the health and safety committee.
* Any changes to these guidelines must have the consensus of the committee, be set out in writing, and be attached, as an appendix.

**Committee members**:

\_\_\_\_Jeff Chislett \_\_\_Damon Sweeney\_\_\_\_\_\_\_

\_\_\_\_Garry Chatman\_\_ \_\_\_\_\_\_\_\_ \_\_\_Lloyd Barbour\_\_\_\_\_\_\_\_

\_\_\_\_Amanda Stokes\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_Nathan Lockyer\_\_\_\_\_\_\_

Date: \_\_\_\_December 12, 2020\_\_\_\_\_\_\_

# 3.0 Training Program

Training and instruction are required to provide personnel a proper understanding of the hazards and safeguards associated with their duties. Training requirements will be effectively communicated to the workforce prior to the start of the worker activity. All personnel are to receive all the regulatory training required to complete the tasks assigned. All training records will be kept for each employee.

# 3.1 Training Requirements

The *Occupational Health and Safety Act* and Regulations expressly or implicitly require the following safety related training for relevant employees.

General Orientation for all New Employees

* To familiarize with general safe work practices and general safety rules to acquaint with safety legislation and worker duties.
* All new employees will be trained in all safety aspects of the company’s safety program.

Job Specific Orientation

* To familiarize one with job specific hazards and means to control those hazards.
* To familiarize with relevant safe work practices and safe work procedures
* To demonstrate competence to one's supervisor with respect to the operation of a hazardous tool or equipment.

First Aid

* To provide emergency first aid services at the workplace
* Number of persons trained at each workplace depends on the number of workers at the workplace: where there are 2-14 employees, at least one worker must be trained to the "emergency level" of training; where there are 15 or more but less than 200 employees, one worker must have a standard first aid certificate. There will also be one additional worker trained to the emergency level for each group of 25 workers.
* Acceptable first aid certificates must be issued by the St. John Ambulance Society. They normally expire after three years from date of training.
* "Emergency first aid certificate" is issued upon successful completion of an eight-hour training program; "standard first aid certificate" is issued upon successful completion of a 16-hour training program.
* Names of persons holding valid first aid certificates must be posted at the workplace.
* All supervisors will be trained in Standard First Aid
* All other employees including managers will be trained in Emergency First Aid.

Occupational Health and Safety Committee

* Workplaces with 10 or more employees must establish Occupational Health and Safety committees; workplaces with 2- 9 employees must select a Workplace Health and Safety Committee
* Workplaces with more than 50 employees must train all members of the committee; workplaces with 10-49 employees must train only the co-chairpersons.
* Training pertains to duties of committee members and Committees.
* Training must follow Workplace Health, Safety and Compensation Commission standards; three days of training for committee members.
* Training certificates are issued by Workplace Health, Safety and Compensation Commission without expiry date.
* The trainer must be certified by Workplace Health, Safety and Compensation Commission

Specific Duties of Workers:

* A worker shall co-operate with his or her employer and with other workers in the workplace to protect:
* his or her own health and safety,
* the health and safety of other workers engaged in the work of the employer, and
* The health and safety of other workers or persons not engaged in the work of the employer but present at or near the workplace.

Working Alone:

In this section, ‘to work alone or in isolation’ means to work in circumstances where assistance would not be readily available to the worker.

Violence Prevention:

“Violence” means the attempted or actual exercise by a person, other than a worker, of physical force to cause injury to a worker, and includes threatening statements or behavior which gives a worker reason to believe that he or she is at a risk of injury.

Workplace Hazardous Materials Information System (WHMIS)

An employer shall ensure that a worker who works with a controlled product or in proximity to a controlled product is informed about all hazard information received from a supplier concerning that controlled product as well as any further hazard information of which the employer is aware or ought to be aware concerning the use, storage and handling of that controlled product.

Where a controlled product is produced in a workplace, an employer shall ensure that a worker who works with that controlled product or in proximity to that controlled product is informed about all hazard information of which the employer is aware or ought to be aware concerning that controlled product and its use, storage, and handling.

|  |  |
| --- | --- |
| **Spectrum Security Inc. Employee Training Requirements** | |
| **Training Type** | **Compliance** |
| Project Safety Orientation | all employees |
| New Hire Orientation | all personnel |
| Recognized Security Training | all employees |
| Emergency First Aid | all personnel |
| WHMIS | all employees |
| Fire Extinguisher | all employees |
| PPE | all employees |
| Traffic Control Training | as required |
| Hearing Conservation | as required |
| Respiratory Fit Test | as required |
| Respirator Training | as required |
| Client additional training | as required by client |

# 3.2 Safety and Site Orientation

Spectrum Security will conduct a formal new hire orientation with all employees. The following items will be covered in all orientation training:

* Health and Safety Policy.
* Modified Work Program.
* Workers Basic Rights.
* Responsibilities.
* Emergency Response, Frist aid.
* Injury Reporting Procedures.
* Company Rules.
* Personal Protective Equipment Requirements.
* Hazard Identification Assessment and Controls.
* Safe work Practices and Procedures; and
* Environmental Policy

Documentation will include at a minimum the following:

* Outline of training agenda.
* Employee Orientation checklist – Signed and dated; and
* Any completed written tests.

# 4.0 Communication Plan

It is the policy of Spectrum Security to communicate with all its workers. This will include the communication of all components of the Occupational Health and Safety Program to ensure that each task that is undertaken is done with the safety of the worker, co-workers as well as the public in mind. This training will be completed through safety training orientation.

There shall be a commitment to the identification of hazards that are involved with the day-to-day tasks that each employee is involved in. With the identification of these hazards Spectrum Security will communicate to all employees about the hazards found and the controls that must be put into place to prevent these hazards from causing an injury or illness.

Communication with all its employees will happen through toolbox meetings. These meetings will be used to educate employees on any new hazards, practices, procedures, or any new information that employee will need to do each task of their jobs as safely as possible. Toolbox meetings will be held monthly or more frequently if required for policy or procedure updates.

# 5.0 Safe Work Practices and Procedures Policy

Spectrum Security will establish safe work practices at all its workplaces to minimize the risk of injury, illness, and property damage.

Specific safe work procedures will be developed for particularly hazardous and critical tasks. Safe work practices and procedures are written documents used to train and guide workers in performing their jobs safely.

A practice is a set of guidelines established to help workers perform a task which may not require a step-by-step procedure.

A procedure is a step-by-step process for performing a task safely from beginning to end.

Managers and supervisors will ensure employees are provided with training and instruction on safe work practices and where applicable, specific safe work procedures. Employees have a duty to comply with the safe work practices and procedures and utilize all safety devices provided to them.

# 5.1 Safe Work Practices

## 5.1.1 Personal Protective Equipment (PPE)

In general, the PPE requested for the various work operations or working conditions must always be worn.

All personnel must wear suitable personal protective equipment for the task they are performing. Minimum requirements for working outside office areas are:

* Hard hats as required.
* Steel toed safety boots(at least 6” in height)
* Reflective vests as required.

Gloves should be worn to protect your hands but when handling liquids, gloves such as neoprene must be worn.

Hearing Protectionis required whenever the noise level exceeds 85 DB or whenever there is a sign posted.

Respiratorsin accordance with CSA Z98.7 must be worn under all conditions where the air circulation is not sufficient to prevent the inhalation of harmful amounts of dusts or gases. A type suitable for the location and hazard involved must be used.

Wet Weather Gearshould be worn by personnel required to work outside during inclement weather. Cold Weather Protection**:**

* Warm Jackets/Pants
* Helmet Liner/Hood

ALL PERSONAL PROTECTIVE CLOTHING AND EQUIPMENT MUST BE KEPT CLEAN AND IN GOOD CONDITION. IT MUST BE REPLACED WHEN IT IS NO LONGER FIT FOR USE.

## 5.1.2 Housekeeping

Order and tidiness are important conditions for safety and satisfaction at work. The individual employee is responsible for housekeeping at his own workplace. Poor housekeeping can lead to accidents.

* Escape routes must be always kept clean.
* Catch any expected liquid spills in a suitable container and dispose of it.
* Always keep your work areas clean of excess debris.
* All flammable waste or packing materials must immediately be removed and placed into designated containers.
* Hoses or cables must never be routed across walkways, stairs, etc.
* Scrap steel materials shall be placed in the designated containers and never left at the workplace.
* Tools and equipment which are not in use shall be returned to the tool stores or other designated storage area.

**5.1.3 Safe Work Practice for Ladders**

Accidents involving ladders cost the Ontario construction industry more than 800 lost-time injuries. The following are the major causes of ladder accidents:

1. Ladders are not held, tied-off or otherwise secured.
2. Slippery surfaces and unfavorable weather conditions cause workers to lose footing on rungs or steps.
3. Workers fail to grip ladders adequately when climbing up or down.
4. Workers take unsafe positions on ladders (such as leaning out too far).
5. Placement on poor footing or at improper angles causes ladders to slide.
6. Ladders are defective.
7. Ladders are toppled by high winds.
8. Ladders are carelessly handled or improperly positioned near electrical lines.

**Preventing ladder accidents on the job site**

1. Check ladder for defects before use.
2. Clear scrap and material away from the base and top of the ladder, since getting on or off the ladder is relatively hazardous.
3. Secure the base against accidental movement. Secure the top also.
4. Set the ladder on a firm, level surface. On soft, non-compacted, or rough soil, use a mudsill.
5. Single-width job-built ladders are only meant for one worker at a time. A double-width ladder can be used by two workers, providing they are on opposite sides.
6. Make sure that rails on ladders extend at least 3 feet above the  
   landing. This allows for secure grip while stepping on or off.
7. Set straight or extension ladders one foot out for every 3 or 4 feet up, depending on length of ladder.
8. Before setting up ladders, always check for overhead power lines.
9. Do not position ladders against flexible or moveable surfaces.
10. Always face the ladder when climbing up or down and while working from it.
11. Maintain 3-point contact when climbing up or down. That always means two hands and one foot or two feet and one hand on the ladder.
12. Keep your center of gravity between the side rails. Your belt buckle should never be outside the side rails.
13. When climbing up or down, do not carry tools or material in your hands. Use a hoist rope instead.
14. Keep boots clean of mud, grease or any slippery materials which could cause loss of footing.
15. When working 3 meters (10 feet) or more above the ground or floor, wear a safety belt or safety harness with the lanyard tied off to the structure.
16. Never straddle the space between a ladder and another object.
17. Never erect ladders on boxes, carts, tables, or other unstable surfaces.
18. Use fall-arrest equipment such as ladder-climbing devices or lifelines when working from long ladders or when climbing vertical fixed ladders.
19. Never use ladders horizontally as scaffold planks, runways, or any other service for which they have not been designed.
20. Stand no higher than the third or fourth rung from the top. Maintain knee contact for balance.
21. Do not splice short ladders together to make a long ladder – the side rails will not be strong enough for the extra loads.
22. Do not use ladders for bracing – they are not designed for this type of loading.
23. Do not set up ladders in doorways, passageways, driveways, or  
    any other location where they can be struck or knocked over.
24. Never rest a ladder on its rungs. Ladders must rest on their side rails.
25. To erect long, awkward, or heavy ladders, get help to avoid injury from overexertion.
26. Before erecting, using, or working from ladders, always check for electrical hazards. Never use aluminum ladders near live electrical equipment or wires.

**5.1.4 Safe Work Practice for Scaffolding**

1. The erection and dismantling of scaffolds must be carried out under the supervision of a competent worker who is knowledgeable and experienced in such operations.
2. Workers erecting and dismantling a scaffold more than 3 meters (10 feet) high must be tied off with a full body harness and lanyard equipped with a shock absorber.
3. Scaffolds must be erected with all braces, pins, screw jacks, base plates, and other fittings installed, as required by the manufacturer.
4. Scaffolds must be adequately braced horizontally and vertically.
5. Scaffolds must be equipped with guardrails consisting of a top rail, mid-rail, and toe board when the platform is 1.22 meters above grade or floor level.
6. Scaffolds shall be effectively secured to a building or structure where the height of the scaffold exceeds 3 times its minimum base.
7. Scaffold frames must be properly pinned together where scaffolds are two frames or more in height or where they are used as rolling scaffold towers.
8. Scaffolds must be erected, used, and maintained in a reasonably plumb condition.
9. Scaffold planks must be securely fastened to prevent them from sliding.
10. Scaffold planks must be installed so that they overhang by at least 15 centimeters (6 inches) but no more than 30 centimeters (12 inches).
11. Scaffold planks must be:
    * Of good quality,
    * Free of defects, such as loose knots, splits, or rot,
    * Rough sawn, measuring 5.08 cm by 25.40 cm dimensions.
12. Scaffolds must be equipped with a proper ladder for access. Vertical ladders must be equipped with 30 cm rung space and 15 centimeter behind each rung.
13. Remove ice, snow, oil, grease, and other slippery material from the platform, and apply sand to the surface.
14. Wheels or casters on rolling scaffolds must be equipped with braking devices and securely pinned to the scaffold frame.

**5.1.5 Powered Aerial Work Platform**

Hazards Identified falls from heights.

Personal Protective Equipment See PPE section in this procedure.

Training fall protection, operating procedures

Regulations / References OHS Regulations, section 101.

**Safe Work Procedure**

This safe work procedure applies to aerial platforms which are not licensed to travel on public highways. It applies to boom lifts as well as scissor and vertical lifts. Aerial platforms mounted on forklifts or vehicles licensed to travel on public highways require additional safety precautions.

**Before Operating an Aerial Platform**

Only those individuals who have been authorized by their supervisor and properly instructed in operation procedures are permitted to operate an aerial platform.

The operator must be familiar with the operating procedures and safety precautions as outlined in the manufacturer's operating manual. This includes but is not limited to the following: the manufacturer's warning and caution signs on the machine locations of all emergency controls and emergency operations daily maintenance checks to perform load limits and stability requirements.

The operator must do a careful pre-use inspection of the machine and any problems identified must be reported to the supervisor immediately and corrected before operations begin. This includes, but is not limited to the following:

• a walk around visual inspection to ensure tires are properly inflated,

• there are no teaks in hydraulic or fuel lines, and no damage to body, frame, and platform

• check fuel supply and oil levels

• check to ensure both upper and lower controls are functioning properly

The operator must do a careful pre-use inspection of the work area to identify any possible operating hazards. Any hazards identified must be reported immediately to the supervisor if they cannot be adequately controlled by the operator. These may include but are not limited to the following:

• Powerlines: If the platform must be operated within 5.5 meters (18 feet) of an overhead powerline, a written clearance must be obtained in advance from the power utility and the operator must have a valid powerline hazards certificate.

• Ground Conditions: including uneven ground, slopes, obstructions, drop offs and debris.

• Visibility: including overhead obstructions.

• Traffic: other equipment, vehicles, and/or personnel may require roping-off or barricading the work area and using signage.

• Weather and Wind Conditions: severe conditions may limit or prohibit use of the aerial platform

**Personal Protective Equipment**

Each worker using an aerial platform shall wear appropriate fall arrest equipment including a full body harness and a lanyard. The lanyard shall be tied off to the anchor designated by the manufacturer.

Each worker using an aerial platform shall wear appropriate safety footwear. Each worker using an aerial platform shall wear appropriate head protection.

Each worker using an aerial platform shall wear eye protection appropriate to the exposure wherever he or she is exposed to the threat of eye injury.

Each worker using an aerial platform shall wear suitable devices to protect their hearing wherever he or she is exposed to excessive noise.

Each worker using an aerial platform shall wear protective clothing, including gloves, appropriate to the conditions.

**Operating an Aerial Platform**

The operator shall always exercise due care and attention while operating the aerial platform as well as observe all the manufacturer's precautions. Where applicable, the operator shall ensure the stabilizers provided by the manufacturer are used.

The operator will immediately stop operation of the aerial platform in the event of any mechanical malfunction or potentially hazardous condition. The problem must be reported to the supervisor and corrected before operations are resumed.

Workers shall not use any devices such as ladders on aerial platforms to achieve additional height or reach. They shall not modify or add attachments to the platform.

The operator shall avoid contacting any structure with the aerial platform. However, if the platform becomes caught against a structure and force is exerted against the platform, the operator shall stop operations from the platform. A sudden release of force against the platform could result in the workers being ejected from the platform. Therefore, the workers must be removed from the platform with the assistance of a second aerial platform or the emergency high angle rescue personnel (i.e., fire department). After the workers have been returned to the ground, the platform must be dislodged from obstruction using the ground controls.

Worker(s) on the platform must have a "buddy" on the ground to assist in the event of an emergency or some means of communication (e.g., cell phone or radio) with someone nearby. Operation of the controls shall be done smoothly, and sudden stops avoided.

When traveling on a slope, the operator shall travel in line with the slope as much as possible, as opposed to traversing it. When working on a slope, face uphill and use wheel chocks as appropriate.

**5.1.6 Working Near Overhead Power Lines**

Using proper safe practices/procedures near power lines is necessary. Work with your supervisor and co-workers to ensure a proper safety attitude at your workplace.

Injuries and deaths near power lines are all too common. Near misses are frequent. Avoiding contact with power lines requires common sense, a strong awareness of safety factors, and good decision-making ability.

Please review and adhere to the following practices/procedures when planning and performing work near overhead power lines.

* Before work begins, conduct a hazard assessment, and examine the work area to identify and correct hazards and to establish that the safe limits of approach distances to overhead power lines can be maintained.
* Contact the electrical utility to determine the operating voltage of the line and confirm the safe limits of approach distances.
* If work must be performed at a distance Also, request assistance from the electrical utility if the work must be performed at a distance that is less than those specified in table 1. In this situation have the electrical utility disconnect or relocate the line if needed. If this is not practical or feasible to do so, carry out the following:
* Always keep an eye out overhead; take time to examine the hazard.
* Before operating equipment, make a safety plan that prevents contact with lines.
* Take extra care and precautions.
* Check the height of your equipment or load.
* Plan your moves – are there power lines to pass under or avoid?
* Look out for uneven ground that may cause your vehicle to weave, bob, or bounce.
* Think about wind and temperature – they may affect the power line’s height.
* Never ride or climb on equipment or a load when near a power line.
* Work around power lines to be done only during daylight hours.
* Do not ground your equipment around a power line.
* Do not allow equipment or objects to approach the overhead power line closer than the safe limit of approach specified.
* If work is being carried out near the safe limit of approach, use a trained signaller to act as an observer to ensure that the required distance is maintained. (Communication by radio or air horn).
* Do not place materials under or adjacent to the overhead power line if it reduces the clearance above ground required by O.H & S regulations. Contact the electrical utility for assistance to determine the required clearance between the power line and the ground.
* Remember electricity is invisible, do not take chances.
* Keep a safe working distance between your equipment and power lines – follow O. H. & S Regulations which require you to stay clear of power lines. Do not go too close with people or equipment.
* The limits are outlined in the regulations. Depending on the voltage of the power line, you need to establish a safe working distance and make sure everyone follows the guidelines shown on page 4 for safe limits of Approach.

**In an Emergency**

Accidents can be prevented with “safety first” in mind. If you or a co-worker encounters an overhead line, remember:

* If you are alone and do not have a radio, stay in the vehicle until help arrives this is the safest place.
* Stay alert and keep other workers away from the area.
* Do not try to break contact if the cable or equipment appears to be welded to the line – this could cause the line to whip or snap.
* Do not touch power lines with wood, the wood maybe damp and conduct electricity.
* If a line is on the ground, it could be charging the surrounding area. Stay back 30 feet from the line. As well, if a line is touching a piece of equipment, do not come near to the equipment or touch it.
* Do not assume the lines are dead:
* Contact the electrical utility to turn off the power.

**Fires and Power**

In the event of a life-threatening fire, jump clear and try to land as far away as possible (on both feet) without touching the equipment as you land. Do not, under any circumstance step down and allow part of your body to be in contact with the ground while any other part of your body is touching the machine.

Jump with both feet together maintain balance; ensure that both feet land together. Remember – you are still in danger even if you have cleared the vehicle – shuffle away from the vehicle without taking your feet off the ground and only sliding your foot ahead of the other slightly.

**Reporting**

If you strike a power line, call the electrical utility right away. Report the details of the incident.

The utility will inspect and repair the area. You also need to report the incident to Occupational Health and Safety.

**5.1.7 Procedures for Use of Fall Protection**

All employees who are exposed to the hazard of falling from a work area that is:

* 3 meters or more above the nearest safe surface or water,
* Above a surface or thing that could cause injury to the person on contact
* Above an open tank, pit or vat containing hazardous materials.
* If the person shall wear a fall arrest system. A guardrail, personnel safety net or temporary flooring may be used instead of a fall arrest system.

Where an employer determines that it is impractical to provide adequate work platforms or staging, the employer shall ensure that a fall protection system is in place. The employer shall ensure that all employees must be trained in the use, selection, inspection, and proper maintenance of all components of fall protection systems before work at heights starts.

Harnesses are used to provide workers working at heights above ground a level of freedom to move and protection from falls.

The components that are necessary for a fall protection system must be adequately secured to:

1. Anchorage Point
2. Lifeline

* That is fastened to the anchorage point.
* Attached to a static line that is securely fastened to the anchorage point.
* CSA Standard Z259.21 “Fall Arrest, Vertical Lifelines and Rails.”
* Be secured to prevent tangling or disturbance of the line and be free of knots.
* Be free of splices except where necessary.
* Be provided with softeners at all sharp edges or corners to protect against cuts or chafing.
* Be only used by one worker at a time.
* A rope shall not be used as a lifeline.

1. Lanyard

* that is attached to an anchorage point or lifeline, above the workers shoulders.
* Complies with CSA Standard Z259.11 “Energy Absorbers and Lanyards.”
* Prevent a free fall greater than 1.22 meters.
* Or a combined fall that exceeds the distance between the work area and the safe surface.

1. Full body harness

* Attached to a lanyard.
* Adjusted to fit the user of the harness.
* Complies with CSA Standard Z259.10 “Full Body Harnesses.”

1. Rope grab
2. Lifeline anchor
3. Connectors

All full body harness and lanyards must be CSA-certified. Full body harnesses must be snug-fitting and worn with all hardware and straps intact and properly fastened. Arrest systems require a full body harness.

A lifeline can never be used as a service line. The only time a lifeline becomes a load bearing line is in the event of a fall. At all other times it should be just slack enough to permit free movement of the service lines. No more than one worker shall be attached to a lifeline.

All components must be used at all time when working at heights.

**Maintenance and Inspection**

The following is only a guideline for maintenance, care, and storage.

All equipment used in a fall arrest system must be maintained to manufacturer's specifications. Any equipment in need of maintenance must be tagged and removed from service.

* All hardware should be cleaned and lubricated with a light oil.
* Store in a clean, dry location free of corrosives and harmful fumes
* Store out of direct sun light.
* Clean synthetic webbing with a wet sponge. Use a mild detergent for more difficult stains.
* Equipment should always be dried thoroughly after becoming wet.
* Keep away from excessive heat.
* Lubricate parts as recommended by manufacturer.

When the fall protection system has arrested a fall of a worker the employer shall take all components out of service and they must be inspected by a qualified person. They equipment must also be repaired back to the original manufacturer’s specifications before it is reused.

Fall Protection equipment must be inspected by the user before each and after every use. A detailed inspection must also be conducted at regular intervals, (minimum yearly), by a competent person. When there is damage found in either the daily or annual inspections the damaged equipment must be removed from service and repaired before reused.

The following components must be checked each time the fall protection equipment is used:

Webbing: Examine all webbing on both sides from end to end. Flex webbing over fingers bending it to expose any signs of damage. Look for evidence of damage related to cuts, tears, abrasions, heat burns, kinks, knots, broken strands, or excessive wear. Discolored, fused, brittle or melted fibers may indicate signs of damage from heat, paints solvent or chemicals.

Lanyards should be examined for signs of shock loading. Any piece of equipment that has arrested a fall must be removed from service, destroyed, or returned to manufacturer for evaluation.

Hardware: Evidence of defects or damage to hardware elements will require the equipment to be taken out of service. Cracks, sharp edges, deformation, corrosion, chemical attack, excessive aging, or excessive wear should be examined. Check the metal wear at the base of the D-ring and make sure the D-ring pivots freely. Check buckles to ensure that they are not bent or distorted and that they can move freely back and forth and engage correctly.

All locking snaps and karabiners should operate smoothly. The latch (keeper) must close securely against the snap nose.

Rivets: Make sure rivets are holding tightly and have not pulled through the webbing. Rivets should not be bent. Pitted rivets indicate chemical damage.

Stitching: Make sure there are no more than two breaks in the thread or any stitch pattern.

Grommets: Must be tight, not distorted or broken. Check for corrosion, dents, sharp edges, or cracks.

Ropes and Cables: Examine the rope from end to end, rotating it as the inspection proceeds. Rope must be free of knots and of consistent diameter. Look for discoloration, broken, cut, crushed, worn, or deformed fibers. Damage can be caused by chemicals, welding, painting and exposure to light or heat.

Retractable Lines: Check the wire rope lifeline for broken strands. The locking mechanism should be examined at different extended lengths to ensure correct operation. The hook should be secure on the line, in good condition and free to swivel. Check indicator button, where applicable, to ensure the unit has not arrested a fall.

**Emergency Response/Rescue Plan**

All workers that are involved in a fall while wearing fall protection must be rescued right away.

* The first worker on the site of the accident must call 9-1-1 immediately to get to employee down.
* Inform them that there is a worker that is hanging from their fall protection.
* Keep the employee claim.
* If possible to get the employee down without hurting the worker or you, do so.

**FALL PROTECTION EQIPMENTS INSPECTION FORM**

|  |  |  |
| --- | --- | --- |
| **Components** | **Accepted/**  **Rejected** | **Comments** |
| **Harness Inspection  Webbing**  Watch for frayed edges, broken fibers, pulled stitches, cuts, burns, and chemical damage. | Accepted Rejected |  |
| **“D” Rings/Back Pads**  Check “D” rings for distortion, cracks, breaks, and rough or sharp edges.  The “D” ring should pivot freely.  “D” ring back pads should also be inspected for damage. | Accepted Rejected |  |
| **Attachment of Buckles**  Note any unusual wear, frayed, or cut fiber, or distortion of the buckles | Accepted Rejected |  |
| **Attachment of Buckles**  Note any unusual wear, frayed, or cut fiber, or distortion of the buckles. | Accepted  Rejected |  |
| **Tongue/Grommet**  The tongue receives heavy wear from repeated buckling and unbuckling.  Inspect for loose, distorted, or broken grommets.  The webbing should not have any additional punched holes. | Accepted  Rejected |  |
| **Other: Tongue Buckle**  Buckle tongues should be free of distortion in shape and motion.  They should overlap the buckle frame and move freely back and forth in their socket.  The roller should turn freely on the frame.  Check for distortion or sharp edges. | Accepted  Rejected |  |
| **Friction and Mating Buckles**  Inspect the buckle for distortion.  The outer bars and center bars must be straight.  Pay special attention to corners and attachment points of the center bar. | Accepted  Rejected |  |
| **Lanyard Inspection Hardware**  Snaps: Inspect closely for hook and eye distortions, cracks, corrosion, or pitted surfaces.  The keeper (latch) should seat into the nose without binding and should not be distorted or obstructed.  The keeper spring should exert sufficient force to firmly close the keeper.  Keeper locks must prevent the keeper from opening when the keeper closes. | Accepted  Rejected |  |
| **Web Lanyard**  While bending the webbing over a curved surface such as a pipe, observe each side of the webbed lanyard.  This will reveal any cuts or breaks.  Examine the webbing for swelling, discoloration, cracks, or burns.  Observe closely for any breaks in the stitching. | Accepted  Rejected |  |
| **Rope Lanyard**  Rotation of the rope lanyard while inspecting from end to end will bring to light any fuzzy, worn, broken, or cut fibers.  Weakened areas from extreme loads will appear as a noticeable change from the original diameter.  The rope diameter should be uniform throughout, following a short break-in period.  Make sure the rope has no knots tied in it.  Knots can reduce the strength of the rope by up to 60%. | Accepted  Rejected |  |
| **Shock-absorbing Lanyard**  Shock-absorbing lanyards should be examined as a web lanyard.  However, also look for signs of deployment.  If the lanyard shows signs of having been put under load (e.g., torn out stitching), remove it from service. | Accepted  Rejected |  |
| **Other:** |  |  |
| Inspected by: Date:  Inspected by: Date: | | |

**5.1.8 Procedure for Confined Space Entry**

**A confined space is defined as:**

To this Part, "confined space" means an enclosed or partially enclosed space that.

* is not designed or intended for human occupancy except for the purpose of performing work.
* has restricted means of access and egress; and
* may become hazardous to a person entering it because of
* its design, construction, location, or atmosphere,
* the materials or substances in it, or
* any other conditions relating to it.

**Entry into confined space**

A confined space shall be entered only were.

* The opening for entry and exit is sufficient to allow safe passage of a person wearing personal protective equipment.
* Mechanical equipment in the confined space is.
* disconnected from its power source, and
* locked out and tagged.
* Pipes and other supply lines whose contents are likely to create a hazard are blanked off.
* Measures have been taken to ensure that, where appropriate, the confined space is continuously ventilated.
* Liquid in which a person may drown or a free-flowing solid in which a person may become entrapped has been removed from the confined space.
* Adequate explosion-proof illumination is provided where appropriate; and
* Adequate barriers are erected to prohibit unauthorized entry.
* Where the workers to enter the space are trained in confined space entry

**Corrective precautions**

Upon first entering a confined space, a worker shall assume the space is hazardous until the contrary is demonstrated.

It is the responsibility of the employer to perform an assessment to determine if the space is a confined space. If it is determined that the space in indeed a confined space the employer must:

* Ensure that all workers that are entering the confined space are trained in confined space entry.
* Shall ensure that they have informed the worker that it is a confined space but posting signs or an equally effective means of advising of the existence of and dangers posed by the confined space.
* An adequate assessment of the hazards related to the confined space has been carried out.
* Appropriate tests for harmful vapors, gasses, fumes, mists, dusts, explosive or flammable substances and oxygen deficiency have been completed.
  + Before entry into the confined space
  + After an interruption in the work procedures
  + At appropriate intervals
* A source containing a hazardous substance leading to the confined space is safely and completely blocked off or disconnected.
* The worker is qualified to safely enter and perform duties within the confined space.
* A written work permit documenting the tests and safety precautions has been completed; and
* A set of written safe work procedures has been developed and a worker has been instructed in these procedures.

**Hazard Assessments**

Employers must also perform an adequate assessment of the hazards related to the confined space has been carried out. The assessment must involve:

* The hazards that may exist due to the design, construction, and location of the confined space.
* The hazards that may develop while work is done inside the confined space.

The assessment of the confined space must be performed by persons with adequate knowledge, training, and experience to carry out the assessment. The employer shall ensure that the assessment is reviewed as often as necessary to ensure that the assessment adequately assesses the hazards that may exist in the confined space.

**Lock-Out**

Electrical equipment controlling agitators and heaters, or other equipment shall be tagged and locked out, as detailed in the Lockout/Tag out procedure.

**Isolation**

Where lock-out procedures are not enough to prevent a hazard from being introduced into the confined space the following procedures must be followed:

1. Adequate measures must be taken to prevent hazardous materials (solid, liquid, vapor, or gas) from entering the confined space while persons are inside.
2. All attachments connected to the confined space shall be removed and connecting lines shall be disconnected.
3. Where connecting lines cannot be removed and capped or blind flanged, line blanks of adequate thickness for full line operating pressure may be used.
4. All disconnecting or blanking shall be performed as close to the confined space as possible. Variations shall only be allowed with written approval, (on the Confined Space Entry Permit), from the manager responsible for the operation of the area and appropriate maintenance personnel, in consultation with an agreement of the persons entering the confined space and their supervision.

**Atmospheric Testing**

Atmospheric testing shall be performed by a person who has been adequately trained in the proper use of testing and monitoring equipment. Before entry, the testing shall indicate the following three factors:

* The concentration of flammable substances is maintained below 10% of the lower explosive limit (LEL ) of that substance or substances.
* A worker's exposure to harmful substances is maintained at acceptable levels in accordance the TLVs established by ACGIH.

Equipment used in testing and monitoring shall be calibrated and monitored according to the manufacturer's instructions.

The levels determined by the atmospheric testing shall be made available at the time of entry to all authorized personnel by posting it on the confined space entry permit that is to be posted at the entry portal or by another effective means.

Appropriate tests for harmful vapors, gasses, fumes, mists, dusts, explosive or flammable substances and oxygen deficiency shall be completed.

1. Before entry into the confined space by any person
2. After an interruption in the work procedures
3. At appropriate intervals – Every hour after primary entry into the confined space.

Where an atmospheric test indicates the presence of a harmful or explosive substance and it is not feasible to provide a safe breathable atmosphere, an employer shall ensure that.

* The oxygen content is between 20% and 22%
* A worker entering the confined space is provided with and wears respiratory and personal protective equipment appropriate to the hazards likely to be encountered; and
* Where a flammable or explosive gas or liquid is present all sources of ignition are controlled or eliminated.

Where control measures referred to in subsection cannot be implemented, a worker shall leave the confined space.

The equipment used to test levels in a confined space must be calibrated based on the manufacture’s specifications, or at least every six months.

**Ventilation**

Confined spaces shall be ventilated whether by natural means or by mechanical ventilation.

Where an atmospheric test indicates an unsafe condition, the confined space shall be ventilated or cleaned or both and periodically retested to ensure that:

* The oxygen content is between 20% and 22%
* The concentration of flammable substances is maintained below 10% of the lower explosive limit (LEL ) of that substance or substances.
* A worker's exposure to harmful substances is maintained at acceptable levels in accordance the TLVs established by ACGIH.

**Temporary Heating Devices**

1. Heaters are required to maintain a suitable thermal environment inside the confined space shall be located outside the space with the hot air supply ducted into the space.
2. Heaters should be vented in accordance with manufacturers’ instructions to prevent escape of any harmful or noxious exhaust gases into the confined space.
3. Direct fired heaters which discharge exhaust gases with the heated air shall not be used to heat confined spaces.
4. A re-assessment of the amount of ventilation required must be made when heating confined spaces which may contain toxic, explosive, or flammable materials.

**Personal Protective Equipment**

Where the atmosphere of a confined space cannot be guaranteed, a breathing apparatus, as directed on the Confined Space Entry Permit, shall be used. A breathing apparatus is required as standby equipment outside the confined space and adequate training in its use must be provided.

A personal gas monitor may also be used. This will draw in air samples and test the samples to determine if the atmosphere is suitable. It will then alert the person if the atmosphere is unsuitable for breathing air.

Protective clothing and respiratory protection shall not be used as a substitute for proper cleaning and job preparation.

An employer shall ensure that a worker who is required or permitted to enter a confined space in which a harmful atmosphere exists or may develop or where he or she may become entrapped by material.

* Wears appropriate retrieval equipment which would keep the worker in a position to be rescued.

* has a lifeline attached to the retrieval equipment, which is always tended by a person, stationed outside the entrance to the confined space who shall be equipped for and capable of effecting rescue?
* The employer shall prevent entanglement of lifelines and other equipment where one or more workers enter the confined space.
* The use of a lifeline is not required where an obstruction or other condition makes its use impractical or unsafe but, in that case, an employer shall implement procedures to ensure the safety of the worker.

**Attendant and Communication**

Where a worker is required to enter a confined space his or her employer shall ensure that an attendant

* Is assigned the worker.
* Is stationed outside and near.
* the entrance to the confined space, or
* where there is more than one entrance to the confined space, the one that best allows the attendant to perform his or her duties.
* Is in continuous communication with the worker. Continuous talking with the employee through conversation while working with the use of 2-way radios.
* Is provided with a device for summoning an adequate rescue response.

An attendant shall not enter a confined space and shall:

* Monitor the safety of the worker in the confined space.
* Aid him or her; and
* Summon an adequate rescue response where one is required.

A system of communication between the attendant and the workers in the confined space must be established and always maintained.

A system of communication between the attendant and the support help must be established and checked for effectiveness before the permit is issued. This check must clearly establish an understandable contact with the support help and is not simply a check of the condition of the equipment.

The communication equipment may range from simple voice or visual contact to UHF radio equipment. Other acceptable systems are an alarm horn or telephone system.

**Emergency and Rescue Procedures**

All employees that are entering the confined space must be fully trained and competent in confined space procedures. Harness with be always worn while working in a confined space. A lifeline, attached to a tripod above the confined space, will be always attached to the D-Ring on the entrant for quick rescue.

Before any confined space entry is made, a designated and trained attendant must attend the entrance. This person shall not leave the entrance of the confined space at any time without being replaced by another trained person.

Two-way radios must be used for communication between the attendant and employees in the confined space. The workers must establish communication with the attendant every five minutes. If the attendant does not receive an attempt at commutations, the attendant must establish the communication. At any time if the worker gives no response the attendant must immediately commence the rescue of the worker. At no time shall the attendant enter the confined space.

If it is possible to retrieve the worker from the confined space with the use of the lifeline and tripod attached to the worker, this method will be used.

If at any time the worker cannot be retrieved, no worker is to entry the confined space, emergency crews shall be called to entry the space with the proper equipment.

**Entry Permit**

The permit issuer will fill out the permit below for each initial entry and at the start of each new operating shift, the operator in charge and the attendant will ensure that the conditions that are specified on the confined space permit are still in effect. Also, a new safe work permit will be issued at this time.

**Distribution of Entry Permit**

3 copies must be always available.

Copy 1:

Be retained by the supervisor of the entering group.

Be released to the issuer if the confined space permit details change. At this point a new confined space permit would be required.

Copy 2:

Be retained in the control room (with Supervisor), for the duration of the entry.

Be maintained in the operating records once the entry is complete.

Copy 3:

Be posted at a conspicuous place outside the confined space.

Be removed for revalidation and when the entry is complete.

**Copy 1** with the entry team.

**Copy 2** supervisor’s copy.

**Copy 3** posted at entrance of the confined space.

**5.1.9 Procedure for Discovery of Asbestos**

Asbestos is a naturally occurring material once used widely in the construction industry. Its strength, ability to withstand high temperatures, and resistance to many chemicals made it useful in hundreds of applications. However, when asbestos is inhaled, it can be harmful and lead to the following diseases:

* Asbestosis
* Lung cancer
* Mesothelioma (cancer of the lining of the chest and/or abdomen).

It can be found in different products some induce:

* Sprayed-On Fireproofing
* Pipe and Boiler Insulation
* Loose Fill Insulation
* Asbestos Cement Products
* Acoustical Plaster
* Acoustical Tiles
* Vinyl Asbestos
* Gaskets
* Roofing Felts
* Asphalt/Asbestos Limpet Spray
* Drywall Joint-Filling Compound
* Coatings and Mastics

Umbrella Security is committed to the protection of all its workers from any health hazards this includes Asbestos. It is the policy of Umbrella Security to determine that a building is free of asbestos before any worker commences work on that building.

Umbrella Security will confirm that asbestos is not present in the building through confirmation from the building owner in writing.

Umbrella Security also has developed a procedure in case of accidental or suspected discovery of asbestos during the duration of the work.

When work is being done and there is suspected discovery of asbestos the following steps are to be followed:

* Stop work immediately.
* Take control of the affected area.
* Keep all people including you out of the area.
* Contact the supervisor and report the suspected asbestos and location.
* The suspected area must be tested; the test is to be completed by Power Vac-BELFOR, 155 McNamara Dr. 709-781-3264
* BELFOR will test and determine if the suspected area is asbestos free.
* Until results from the testing are completed no workers shall enter the area
* Work shall only commence when the suspected materials is deemed as asbestos free or properly removed from the work.

Removal of any type of asbestos is to be completed by BELFOR or any other asbestos abatement contractor.

**5.1.10 Safe Work Practice for Defective Tools**

Detective tools can cause serious and painful injuries. If a tool is defective in some way, DO NOT USE IT.

Be aware of problems like:

* chisels and wedges with mushroomed heads.
* split or cracked handles.
* chipped or broken drill bits.
* wrenches with worn out jaws; and
* tools which are not complete, such as files without handles.

To ensure safe use of hand tools, remember:

1. never use a defective tool.
2. double check all tools prior to use; and
3. ensure defective tools are repaired.

Air, gasoline, or electric power tools require skill and the operators’ complete attention, even when they are in good condition. Do not use power tools when they are defective in any way.

Watch for problems like:

* broken or inoperative guards.
* insufficient or improper grounding due to damage on double insulated tools.
* no ground wire (on plug) or cords of standard tools.
* the on/off switch not in good working order.
* tool blade is cracked; and
* the wrong grinder wheel is being used, or the guard has been wedged back on a power saw.

**Remove all defective tools from the work area and mark,**

**“DEFECTIVE – DO NOT USE.”**

## 5.1.11 Traffic Control

All guard must read all attached papers before work is to commence, including:

1. Safe Work Procedure
2. Hazard Assessments
3. Road Rules

Flags person is required to wear a safety vest and steel toe boots. They are also required to use a STOP/SLOW Sign

You are required to follow the Flags person training that was given to each employee.

The work site should be inspected before work to ensure there are no hazards that could cause a problem while the employee works.

The employee must ensure that he is able to control all directions of traffic, if control cannot be gained; the employee is required to report to the supervisor.

When it is identified that traffic cannot be controlled with the use of one Flags person, there must be another Flags person added to control traffic.

When a Flags person is used to restrict the follow of traffic to one direction at a time due to a blockage or road construction; the Flags person must:

1. Place the STOP sign out to traffic without getting in the path of oncoming vehicles. Allow for enough room for the vehicles to move around the blockage without obstruction.
2. When the first vehicle has stopped the guard can then step out in front of the car to allow other vehicles behind the first car to see and identify the reason for the stoppage.
3. The Flags person shall stop traffic coming in the opposite direction as well with the use of hand signals and the STOP/SLOW Sign
4. The Flags person can then signal to the direction of traffic that needs to clear first.
5. Ensure that traffic in the opposite direction is not stopped for more than 3 minutes.
6. The moving traffic shall then be stopped using the STOP/SLOW Sign.
7. Once stopped the opposite traffic can be told to proceed using the SLOW Sign.

When a Flags person is used to allow for vehicle crossing; the Flag person must:

1. The guard must first place the STOP sign out to traffic without getting in the path of an oncoming vehicle.
2. Once the first vehicle has stopped the guard can then step out in front of the car to allow other vehicles behind the first car to see and identify the reason for the stoppage.
3. The Flags person can then turn the sign and stop the opposite direction traffic by repeating steps 1 and 2.
4. The Flags person can then point the slow sign to the vehicle crossing traffic.
5. Once the vehicle has passed the Flags person can then step back and allow traffic to proceed as normal.

At no time shall the guard leave his post without having another trained to guard to relieve them.

## 5.1.12 Working Alone Procedure

The personal safety and health of each employee of the company is of primary importance. The prevention of occupationally induced injuries and illnesses is of such consequence that it will be given priority over operating productivity if necessary.

What is meant by “Working Alone”?

Employees are alone at work when on their own; they cannot be seen or heard by another worker; cannot expect a visit from another worker or member of the public for some time; and/or where assistance is not readily available when needed.

Employer obligations

When employees are required to work alone the company will:

1. Conduct a hazard assessment to identify existing or potential safety hazards in the workplace associated with working alone.
2. Implement safety measure to reduce the risk to employees from the identified hazards.
3. Ensure that the employees have an effective way of communicating with another designated person in case of emergency.
4. Ensure that the employees are trained to perform their job safely.
5. Ensure that employees who are required to work alone have emergency first-aid training.
6. All employees working alone will be required to have a cell phone with them.

Employees can stay safe by adhering to the appropriate measures initiated by the company and reporting any unsafe conditions to their supervisor.

Each guard will be responsible to follow the Working Alone Procedures onsite, any employee that is found to be in non-compliance will be disciplined.

Procedure

All employees working alone are required to:

* Call in to the Main Office at the start of the shift – Identify yourself with your Name, phone number and Site Location.
* Every 2 hours after the initial contact the Night Position Person shall contact the working alone person to ensure the safety and wellbeing of that employee. Recorded must be kept of all calls made.
* If contact is not made at that time the emergency response procedures must be initiated
* Working Alone Employee must call in at the end of their shift – Identify yourself with your Name, Site Location and indicate the end of shift.

Emergency Procedures

* If contact is not made the Night Position Person shall wait 5 minutes and attempt to call the employee again
* If contact cannot be made after the second attempt, Road Patrol shall be contacted to determine if they can check on the employee within a 20-minute timeline.
* When Road Patrol arrives on site the site must be assessed to ensure their own safety before entering. If the site is cleared and the employee is found in good health the reason for non-contact must be established and corrected. If the employee is found to be injured or having a medical emergency 911 must be contacted immediately
* If Road Patrol cannot arrive within the 20-minute timeline, 911 emergency services must be called to response to the site.
* If 911 services must be called the General Manger must be contacted immediately at 763-3535 to be made aware of the situation

## 5.1.13 Vehicle Search Procedures

The purpose of this procedure is to give guidelines to all security personnel who will be directly involved in the searching of vehicles who wish to gain access to the Site, ensuring that high standards of safety and security are maintained.

This procedure shall apply to all employees, contractors, visitors, or any persons entering, or leaving, the Site.

It shall be the aim of this procedure for security guards to conduct random, routine, searches of vehicles entering/leaving the Site.

Searches shall be conducted using a random pattern, to ensure both day and night shift work patterns are covered.

**Vehicle Search Guidelines**

Stop the vehicle by using hand-and-arm signals.

DANGER: ALWAYS POSITION YOURSELF SO THAT YOU ARE HIGHLY VISIBLE TO TRAFFIC WITH GOOD APPROACH SIGHT DISTANCE, AND WEAR REFLECTIVE VESTS SO THAT THE VEHICLE DRIVER CAN SEE YOU EASILY. NEVER STEP INTO THE PATH OF AN APPROACHING VEHICLE TO DIRECT MOVEMENT OR STOP THE VEHICLE.

Direct the driver to turn the engine off and apply the parking brake.

Address the driver and vehicle occupants.

• Identify yourself to the driver and occupants.

• Inform the driver that.

• “I wish to make a routine search of your vehicle, in accordance with the Company rules, which provide the right of search.”

• The individual selected for a search shall be advised that the search is random, and part of an established routine. The person shall be asked if he/she has any company property in his/her possession. The person shall then be asked if they have permission to search the vehicle.

• To ensure consistency, always use the same starting point and search pattern, and be sure to search the entire vehicle.

• Direct the occupants to exit the vehicle.

• Direct the driver to open all interior compartment doors, the hood, the trunk, and rear doors (if applicable) of the vehicle, while maintaining constant observation; and

• Direct the occupants to move to a designated safe area (about 5 meters from the vehicle and/or out of the flow of traffic) where they can be observed.

If nothing untoward is found, the driver and occupants of the vehicle being searched should then be thanked for his/her cooperation and permitted to leave.

Request supporting documentation for any tools or items located during search.

Should company property be found during the search, the following steps are to be taken:

• **During Normal Working Hours** – The person concerned shall be taken, together with the property, to Human Resources Department, where he/she will be interviewed.

• **Outside Normal Working Hours** – The person shall be asked to provide a written explanation. The Duty Manager should witness the person’s statement, wherever possible. Notes of the person’s statement shall be kept. The security guard shall take possession of the property, and inform the person concerned not to report for further duty until notified to do so by the Human Resources Department. The person shall be permitted to leave.

The security guard shall then contact the Human Resources Manager to inform them of the facts.

Should the person refuse to attend Human Resources, or provide a statement, they will be informed that their action is being recorded and they may face disciplinary action.

**Refusal to Search.**

Should a person refuse to be searched, then the following action is to be taken:

• **During Normal Working Hours** – The person concerned shall be taken to the Human Resources Department, together with the found property, where he/she will be interviewed.

• **Outside Normal Working Hours** – The person shall be asked to remain where they are, and the person’s vehicle shall be kept under observation, whilst the security guard telephones the Human Resources Manager.

It is emphasized, however, that should a person resist detention, no physical force shall be used to prevent the person from leaving. In this event, the person must be informed that this refusal to cooperate will be recorded, and that he/she may face disciplinary action.

**Guidance Notes**

Where theft of Company property has been discovered, the police MUST NOT be involved without reference to the Human Resources Manager.

Details of all searches shall be recorded in the Daily Occurrence Log.

A separate written report shall be prepared, without delay, following the detection of theft, or unauthorized removal of Company property, or in cases where a person has refused to be searched. A copy of the report is to be given to the Human Resources Manager.

## 5.1.14 Personnel Search Procedures

The purpose of this procedure is to give guidelines to all security personnel who will be directly involved in the searching of personnel, who wish to gain access to the Site, ensuring that high standards of safety and security are maintained.

This procedure shall apply to all employees, contractors, visitors, or any persons entering, or leaving, the Site.

It shall be the aim of this procedure for security guards to conduct random, routine, searches of personnel entering/leaving the Site.

Searches shall be conducted using a random pattern, to ensure both day and night shift work patterns are covered.

**Searching**

The security guard requesting the search shall approach the person and speak.

“I wish to make a routine search of your bag/lunch box/item etc. (as appropriate), in accordance with the Company rules, which provide the right of search.”

The individual selected for a search shall be advised that the search is random, and part of an established routine. The person shall be asked if he/she has any company property in his/her possession. The person shall then be asked if they have permission to search the bag/lunch box/item etc. If there is a suspicion that the person may have Company property in his/her pockets, the person shall be asked to turn out his/her pockets also.

To ensure consistency, always use the same starting point and search pattern, and be sure to search the entire bag/lunch box/item etc.

Visually search the item before reaching your hands into the item. This is to ensure that you do not injure yourself on any sharp objects.

Physically search the outside of the bag/lunch box/item, including the top, bottom, sides, handles, straps, inside and outside pockets and be alert to the possibility of there being hidden compartments.

Open the item, look at the general contents, and choose a starting point inside the bag, looking for items that may be hidden in any lining.

Search pockets, and/or compartments, and continue to search the inside edges and surfaces until you return to your starting point.

Physically search the inside bottom of the bag.

Repack any articles and return the bag/lunch box/item to the person.

If nothing untoward is found, the person being searched should then be thanked for his/her cooperation and permitted to leave.

Request supporting documentation for any tools or items located during search.

Should company property be found during the search, the following steps are to be taken:

• **During Normal Working Hours** – The person concerned shall be taken, together with the property, to Human Resources Department, where he/she will be interviewed.

• **Outside Normal Working Hours** – The person shall be asked to provide a written explanation. The Duty Manager should witness the person’s statement, wherever possible. Notes of the person’s statement shall be kept. The security guard shall take possession of the property, and inform the person concerned not to report for further duty until notified to do so by the Human Resources Department. The person shall be permitted to leave.

The security guard shall then contact the Human Resources Manager to inform them of the facts.

Should the person refuse to attend Human Resources, or provide a statement, they will be informed that their action is being recorded and they may face disciplinary action.

Refusal to Search.

Should a person refuse to be searched, then the following action is to be taken:

• **During Normal Working Hours** – The person concerned shall be taken to the Human Resources Department, together with the person’s bag/lunch box/item, where he/she will be interviewed.

• **Outside Normal Working Hours** – The person shall be asked to remain where they are, and the person’s bag/lunch box/item shall be kept under observation, whilst the security guard telephones the Human Resources Manager.

It is emphasized, however, that should a person resist detention, no physical force shall be used to prevent the person from leaving. In this event, the person must be informed that this refusal to cooperate will be recorded, and that he/she may face disciplinary action.

**Guidance Notes**

Where theft of Company property has been discovered, the police MUST NOT be involved without reference to the Human Resources Manager.

Details of all searches shall be recorded in the Daily Occurrence Log

A separate written report shall be prepared, without delay, following the detection of theft, or unauthorized removal of Company property, or in cases where a person has refused to be searched. A copy of the report is to be given to the Human Resources Manager.

## 5.1.15 Procedures for Bomb Threat

All bomb threats will be taken seriously. Consult with the Police Department to determine the appropriate course of action.

In most cases, the fire alarm should not be activated in the event of a bomb threat. Activating the fire alarm during a bomb threat will leave people with disabilities in designated “safe refuge areas”.  The Police may mobilize the Emergency Response Team without making use of the general alarm system.

**Responding to a Bomb Threat**

Employees must be instructed in what to do if a bomb threat call is received.  A calm response to the bomb threat caller could result in obtaining additional information.  This is especially true if the caller wishes to avoid injuries or deaths.  If told that the building is occupied or cannot be evacuated in time, the bomb threat caller may be willing to give more specific information on the bomb’s location, components, or methods of initiation.

**When A Bomb Threat Is Called In, Perform the Following Actions:**

1. Remain calm.
2. Attempt to keep the caller on the line if possible.  Ask him/her to repeat the message.  Record every word spoken by the person and use the telephone bomb threat checklist (Attachment II).
   1. Ask for the exact location where bomb has been or is going to be planted.
   2. Get as much information as possible about the caller, e.g., vocal characteristic, race, sex, group affiliation, why the bomb was placed.
   3. Clues from background noises, which might indicate caller's identification and location.
3. Immediately after the caller hangs up, report the threat to **911**, your supervisor, and /or the Emergency Response Team.
   1. Remain available, as law enforcement personnel will want to interview you.
   2. Wait for further direction from the Police.
   3. Do not spread rumors.

**When A Written Threat Is Received, Perform the Following Actions:**

1. Remain calm.
2. Avoid handling it unnecessarily to preserve possible fingerprint(s), handwriting or typewriting, paper, and postal marks. These will prove essential in tracing the threat and identifying the writer.
3. While written messages are usually associated with generalized threats and extortion attempts, a written warning of a specific device may occasionally be received; it should never be ignored.
4. Contact the Police.
5. Wait for further direction the policy.
6. Do not spread rumors.

## 5.1.16 Violence and Aggression at Work

Employees who deal directly with the public may face aggressive or violent behavior. They may be sworn at, threatened, or even attacked.

The Health and Safety Regulation states the definition of violence is:

“Any incidence, in which an employee is abused, threatened or assaulted by a member of the public in circumstances arising out of the course of his or her employment”.

Verbal abuse and threats are the most common types of incident. Physical attacks are comparatively rare. Most people accept that physical force against an individual is an example of violence, but violence can take many forms, including:

* Verbal abuse and threats (with or without a weapon)
* Rude gestures and innuendoes
* Sexual or racial harassment

Where there is no physical injury, there can still be considerable emotional stress; threats may indicate a risk of actual injury. Malicious damage to an employee’s property can also cause distress and fear of future physical attack.

Spectrum Security is committed to taking all reasonable precautions necessary to secure the health and safety of all employees carrying out work activities and in helping to combat violence and aggression.

Spectrum Security will endeavor to support those members of staff who have been assaulted or suffered verbal abuse in their working role.

Where staff may be reluctant to report such matters, this company wishes to stress that reporting incidents of violence and aggression will not be an adverse reflection on the individual’s ability to perform their duties satisfactorily.

This commitment extends to the protection of those employees who work alone.

**Reporting of Incidents**

To help identify and control any potential or underlying problems associated with violence at work within this company, it is necessary we have some formal system for reporting and recording incidents of this nature.

An Incident Report form will be made available at your work site.

Should any of the following incidents occur then an incident Report form should be completed and passed onto your supervisor and management of Spectrum Security.

The following is a list of some of these violent behaviors: physical violence, aggression, verbal abuse, sexual or racial abuse, intentional damage to personal property.

**Incident Report Form**

This form should be completed as soon as possible after the event, preferably by the member of staff involved. The report form covers the following:

* Details of person assaulted.
* Details of assailant/s if known.
* Details of incident (including any injury suffered, treatment received)
* Outcome (whether the Police were called)
* Possible contributory factors/improvements

**Use of Weapons**

Where a member of staff or student has been threatened and/ or assaulted with a weapon of any kind, then the Police must be notified as soon as possible. Members of staff are advised to take extreme caution when confronted with a weapon and not attempt any action which may result in them/other members of staff being injured.

Preventative Strategies

People with responsibility for staff management need to be committed to the objective of reducing risk of violence to employees.

The way jobs are designed can reduce the risk of violence and aggression.

Here are some examples of measures that may prove effective:

* Using cheques, credit cards or tokens instead of cash to make robbery less attractive.
* Making sure that employees get home safely. The threat of violence does not stop when work has ended. For example, if you need staff (particularly female staff) to work late, try and arrange for them to be able to drive to work and park their cars in a safe area.
* Training your staff to enable them to deal with aggression by spotting the early signs and avoiding or coping with it.

# 6.0 Hazard Recognition, Evaluation and Controls Policy

A Hazard Assessment is a thorough examination of an operation (jobsite, shop etc.) for the purpose of identifying what actual and potential hazards exist.

It is the policy of Spectrum Security & Investigations 1998 Limited, to implement a systematic process for the identifications and control of hazards.

Any employee that may encounter any hazards during their time on or off the job regarding the jobsite the hazard must be reported immediately for a proper hazard assessment to be completed. The hazard must be reported to:

* The Site Supervisor or
* General Manager

Each workplace consists of four major components; People, Environment, Materials, Equipment (PEME) and in conducting a hazard assessment all four components must be examined to see what risks are present. It is very important to recognize that the hazard assessment does not deal strictly with things that are wrong at the present time, rather the assessment must deal with what could go wrong---potential hazards.

To conduct a hazard assessment, use the following steps:

* Assemble the people that will be involved.
* Discuss possible hazards with employees.
* Tour the entire operation.
* Look for possible hazards originating with people, material environment and material.
* Keep asking “What if”.
* Identified real or potential hazards.
* Prioritize the hazards.
* Identify controls for the identified hazards.
* Assign responsibility for implementing the control.
* Identify the date the control will be implemented.

Conduct a toolbox meeting with all employees who will be working on the job discussing the results of the Hazard Assessment.

Some hazards can be eliminated, but other must be identified and the risks controlled by use of appropriate procedures or devices. For special hazards i.e., chemicals, or radioactive materials, outside expertise may be asked to assist with recognition of hazards.

At minimum, Spectrum Security, will:

* Perform a comprehensive hazard assessment for all activities, equipment, processes, and property under our control.
* Review the comprehensive hazard assessment bi-annually to ensure its ongoing suitability for our operational needs.
* Perform Initial Site Hazard Assessments prior to the start of any job requiring activities which are new or unusual.

Initial Site Hazard Assessments will be reviewed on an ongoing basis to ensure all necessary controls are in place are in place and appropriate to the need. Project supervisor will advise Project Management of any revisions during monthly Project Joint Occupational Health and Safety Committee meetings. Records will be forwarded to the office for retention.

# 6.1 Definitions

**Hazard:** a condition, practice, or behavior (in the workplace) that has the potential to cause injury, illness, or property damage.

**Accident:** an undesired event that results in a personal injury or illness, damage to or loss of property; process or environment,

**Incident**: an undesired event that under slightly different conditions could have resulted in an injury or loss.

**Hazard Assessment**: a thorough examination of an operation (jobsite, shop, etc.) for the purpose of identifying what actual and potential hazards exist. A hazard assessment is conducted with the direct involvement of the manager when starting a safety program. It should also be conducted when setting up a new jobsite. In addition to inspections, some organizations do a formal hazard assessment periodically.

**Inspection:** an observation of the workplace for the specific purpose of determining the levels of compliance with established safe work practices, procedures, and safety rules. Inspections are conducted on an ongoing basis to maintain the effectiveness of a safety program.

# 6.2 Hazard Identification

A hazard may be defined as a condition, practice, or behavior that has the potential to cause injury, illness, or property damage. Occupational hazards are divided into two broad categories: (1) safety hazards, and (2) health hazards. Generally, health hazards cause occupational illnesses, such as noise induced hearing loss. Safety hazards cause physical harm, such as cuts or broken bones. Hazards exist in all workplaces. It is the duty of employees at the workplace to identify them and control or eliminate them once identified.

**Safety Hazards**

Generally, safety hazards are anything in the workplace that could cause an injury. The injury resulting from a safety hazard is usually immediately following contact with the hazard, unlike an occupational illness, where the effect of contacting the hazard may not be evident for an extended period after the contact. Injuries caused by safety hazards usually result in trauma to the body and may be explained as the hazard having a greater level of energy or force than the body is able to withstand during contact.

Safety hazards are often, though not always, obvious in the work environment.

For example, a tripping hazard may not be removed until after an accident happens, even though many people in the area were aware of it. Careful workplace inspections are an effective means of identifying safety hazards.

Following is a general list of the types of safety hazards that may be found in the workplace.

**Machine Hazards**

* Moving parts, hot parts, absence of guards, poor maintenance.

**Energy Hazards**

* Electricity - overloaded circuits.
* Steam - boiling kettle.
* Heat - hot parts of equipment or tools.
* Pressure - pressure cooker, valves, boilers.
* Gravity - falling objects.
* Mechanical - machines with moving parts.
* Chemical - mixing solvents.
* Kinetic - slip and fall; and
* Potential - hydraulic lift.

**Materials Handling Hazards**

* Mechanical materials handling - includes lifting, lowering, carrying, pushing, pulling, and shoveling items; and handling hazardous.
* Materials - involves handling flammable, reactive, explosive and/or corrosive substances.

**Work Practice Hazards**

* Failure to develop or follow safe work practices/procedures and Poor housekeeping (e.g., improper storage area, high stacking, grease on the floor).

**Health Hazards**

A health hazard may produce serious and immediate (acute) effects, or it may cause long term (chronic) problems. All or part of the body may be affected. Someone with an occupational illness may not recognize the symptoms immediately. For example, lung cancer resulting from exposure to asbestos may not be detected until twenty years after the exposure. The period between exposure to the hazard and development of the illness is referred to as the "latency period".

Health hazards are usually categorized as one of four different types:

1. Biological hazards.

2. Physical health hazards.

3. Physical demands (ergonomic) and stress; and

4. Chemical hazards.

Each of these is discussed below.

**Biological Hazards**

Biological hazards, or biohazards, include any living organism which can cause adverse health effects in humans including:

• Bacteria

• Blood borne pathogens (e.g., hepatic C)

• Viruses (e.g., pneumonia)

• Fungus and molds

• Parasites

**Physical Health Hazards**

Physical health hazards are sources of energy strong enough to cause harm. They include noise, vibration, light, heat or cold, and radiation. These same sources of energy are not hazardous when their levels of intensity are below established standards. The upper and sometimes lower levels of intensity which are safe for most people are referred to as "Threshold Limit Valves" (TLV). For example, the TLV for noise is 85 decibels. This means that most people can withstand an average noise level of 85 decibels for 8 hours a day: 5 days per week, without experiencing noise induced hearing loss.

**Physical demands (ergonomic hazards) and stress**

Often the terms "human factors" are used to refer to a category of hazards which combines ergonomic hazards and psycho-social hazards. It includes design of the workplace, the workstation, tools and equipment, and the workflow. Ergonomics is concerned with controlling these hazards by optimizing the fit between the worker and the environment. It does this by trying to balance the capabilities of the worker with the demands of the job. Ideally, the job should fit the person's mental, physical, and personality characteristics.

Common problems caused by poor work design include repetitive strain injuries, cumulative trauma disorders, and soft tissue injuries (STI), including back injuries. Soft tissue injuries represent most loss time injuries reported to the Workplace Health, Safety and Compensation Commission.

The following factors should be examined when attempting to identify physical demand hazards:

* Posture the worker must use to do the job. Stooping, bending, and crouching without a break and generally awkward postures can cause health problems.
* The task requires excessive force. Excessive force used in lifting, pulling, pushing, and twisting can result in serious strains, and sprains.
* The task involves repetitive movements. Depending on the frequency, speed, and duration, doing something repeatedly on a regular basis over prolonged durations can cause cumulative trauma.

When considering the above factors, it is important to remember they can interact worsening the situation. A good rule of thumb is the more awkward or static the posture required by a job; the more excessive force needed to do the work; and the more repetitive the tasks, then the greater will be the risk of injury. Supervisors should encourage their workers to report the early signs and symptoms of soft tissue injuries.

**Chemical Hazards**

Workplaces have chemicals which, if not properly used or handled, can seriously affect the health of the workers. Some of these chemicals are materials brought into the workplace, such as cleaning agents.

The following is a general list of the types of chemical agents:

* Gases (e.g., carbon monoxide)
* Vapors (e.g., from gasoline)
* Dust (e.g., from asbestos)
* Solvents (e.g., toluene)
* Fumes (e.g., welding)
* Smoke (e.g., tobacco)
* Mists (e.g., paint)

Each workplace should have a complete and current list of the chemicals which could harm the workers in the workplace.

**Contributing Factors**

Often, when hazards are identified, there may be more than a single factor operating.

Often there are four different factors to be considered when identifying a hazard. These contributing factors are:

1. People
2. Equipment
3. Materials
4. Environment

**People include:**

* Contractors, visitors, suppliers, and the public
* Management, who establish departmental policies, practices, and standards.
* Engineers and designers who create the workplace environment.
* Preventive maintenance workers
* Recruitment and selection procedures
* Supervisors and workers

**Equipmen**t, such as tools, machines, vehicles, and personal protective equipment are often a significant contributing factor to creating hazards.

**Materials,** such as chemicals, used in the workplace can also contribute to the formation of hazards.

**Environment** may be the physical environment, such as the facility and indoor air quality, or the non-physical environment such as leadership style, workplace culture, and labor relations tensions.

Identification of hazards in the workplace will be done monthly. Hazards will be identified through the following methods:

1. Workplace inspections
2. Job Hazard Analysis
3. Accident/Incident and First-Aid Records
4. Maintenance Records
5. Operators Manuals
6. Talking to Employees
7. Surveys

**Workplace Inspections**

Hazards that are found from the monthly inspections conducted in and around our workplace will be assessed and controls put into place.

**Job Hazard Analysis**

Job hazard analysis is an active approach to workplace safety. Its main purpose to prevent accidents form happening by:

* Identifying the hazards or potential hazards associated with each step of a job.
* Finding affective control measures to prevent or eliminate exposure.

**Accident/Incident and First-Aid Records**

Records will be used in the identification of hazards. Records will be reviewed to prevent an accident or incident from happening again. Records will be reviewed for repeated injuries that have come about in relation to a job done in or on the workplace.

**Maintenance Records**

Records will be reviewed to ensure that maintenance is being done on all equipment that any employee of our workplace may use. Maintenance will include all safeguards in place. Well working equipment if less likely to cause a hazardous condition if it is used properly.

**Operators Manuals**

Before any equipment is used in the workplace the operator’s manuals will be read to identify any hazards that the manufacturer specifications have said to be hazardous with this equipment.

**Talking to the Employees**

Talking with the employees asking them about any hazards that they see in their job each day is a great form of identification. Employees in the workplace use and operate equipment every day; sometimes the workers do not realize or think about the hazards that may not be affecting them at the time of operation. Talking and asking questions about the job being done may remind the employee of something that they may have forgotten.

**Surveys**

Surveys are a great tool to get workers in a workplace to identify hazards. Surveys that are done without any connection to the worker may reveal more than just talking to the employees.

# 6.3 Hazard Control

The first consideration in hazard control is to determine if the hazards can be controlled at their source (where the problem is created) through applied engineering. Where this is not practical, controls may be placed between the source and the worker. The closer the 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. For example, workers can be required to use a specific work procedure to prevent harm.

One type of hazard control may be completely effective. A combination of several different types of hazard controls may also work well. Whatever method is used, the Occupational Health and Safety committee should try to find the root cause of each hazard and not simply control the symptoms. It may be helpful to review the four types of contributing factors discussed above. For example, it might be better to redesign a work process than simply improve a work procedure. It is better to replace, redesign, isolate or quiet a noisy machine than to issue nearby workers with hearing protectors.

**Controls**

**Elimination:** The very best method of controlling a hazard is toeliminate it completely, if possible. This is the best away to protect workers.

**Substitution:** Where elimination of a hazard is not practical, it may be possible to replace the hazardous condition with something less hazardous. For example, a less hazardous chemical may replace a more hazardous one; and a safer work practice may replace a less safe one. Where substitution is possible, it becomes necessary to do a hazard assessment of the new condition.

**Engineering:**Sometimes engineering can be used to redesign the layout of a workplace, workstation, work processes and jobs to prevent ergonomic hazards. Such as enclosure, isolation or ventilation for example, containers might be redesigned so they are easier to lift and hold. Engineering may be able to improve workplace lighting, ventilation, temperature, process control and so forth.

**Administrative**:limit the amount of time workers spend at hazardous job. They can be used together with other methods of control to reduce exposure to the hazard if the hazard cannot be eliminated completely. Administrative controls only reduce the amount of time you are exposed to a hazard, they do not eliminate exposure.

**Personal Protective Equipment:**is the least effective method or controlling hazards and should only be used when other methods cannot control hazards sufficiently.

# 6.4 Selecting and Monitoring Controls

Selecting controls often involves:

* Evaluating and selecting temporary and permanent controls
* Implementing temporary measures until permanent (engineering) controls can be put in place.
* Implementing permanent controls when reasonably practical

For example, where a noise hazard is identified, temporary measures might require workers to wear hearing protection. Long term, permanent controls might use engineering to remove or isolate the noise source.

**Monitoring the effectiveness of controls**

Sometimes hazard controls do not work as well as expected. Therefore, the Occupational Health and Safety committee should monitor the effectiveness of the corrective action taken by the department during their inspections. The following are appropriate questions:

* Have the controls solved the problem?
* Is the risk posed by the original hazard contained? Have any new hazards been created?
* Are new hazards adequately controlled?
* Are monitoring processes adequate?
* Have workers been adequately informed about the situation?
* Have orientation and training programs been modified to deal with the new situation?
* Are any other measures required?

The effectiveness of hazard controls should be documented in the inspection report, and if appropriate, in the Occupational Health and Safety committee minutes.

# 6.5 Hazard Assessment

After one or more hazards have been identified, it is necessary to estimate the level or risk for each hazard to determine the priority for correcting the hazards. Hazards should be addressed in accordance with the principle of - "correct the hazards with the highest risk first", or "worst first".

Another possible reason estimating the risk associated with a hazard would be when one or more members of the workplace begin to overreact because of the presence of a hazard, expressing a level of fear or agitation which is disproportionate to actual risk of harm. In this situation, a careful and reasoned evaluation of the risk may help to restore a more rational outlook and attitude about the hazard.

Risk assessment, or risk analysis, involves a careful prediction of the consequences of an accident caused by the hazard. The level of risk associated with a hazard is estimated by considering a combination of three factors:

1. The likelihood or probability of the hazard causing an accident and,
2. The severity of the consequences if it did happen, in terms of harm to people and/or damage to property.
3. The exposure time of the hazard.

**Hazard Probability Category**

Probability estimates based on frequencies or actual occurrences shown in experience are desirable, the following definitions may be used:

1. Unlikely to occur.
2. Some chance of occurrence
3. Could occur.
4. Good chance of occurring.
5. Will occur if not attended to

**Hazard Severity Category**

A severity estimate is based on the potential destructive consequences; the following definitions may be used.

1. Insignificant (no damage)
2. First Aid or minor property damage
3. Lost time injury or significant property damage seeks medical assistance.
4. Injury results in permanent disability, serious health effects or property damage
5. Injury results in a fatality or major property damage

**Hazard Exposure Category**

Exposure estimates based on the frequencies of exposure to a hazard.

1. Unlikely – one time per year or less
2. Occasionally – one time per month or less
3. Often – two to four times per month
4. Frequently – One to two times per week
5. Continually – One or more times per day

**Ranking Hazards**

Once all the hazards have been identified, they must be ranked to identify which have the highest risk and are the most in need of effort at developing controls, safe work practices, or formalized task procedures. The priority will be to work on the worst first Hazard ranking is done by the severity of the incident which could arise from the hazard and the probability that an accident could occur, based on the degree of exposure to the hazard condition. In ranking the hazards, attention must be given to control methods which are already in place to eliminate or mitigate the hazard.

Priority Ranking= Probability + Severity + Exposure

**C - Low 3-5**: Hazard requires monitoring, controls and safe work procedures are recommended.

**B - Moderate 6-10**: Hazards require attention, controls and safe work procedures should be in place.

**A - Serious 11-15**: Hazard must be attended to immediately; controls and safe work procedures must be in place.

# 7.0 Inspection Policy

The purpose of workplace inspections is to identify existing and potential hazards with people and equipment, so that the hazards will be controlled or eliminated. Spectrum will maintain a comprehensive program of safety inspections at all sites. Inspections will consist of formal and informal inspections.

Formal inspections are planned, careful, systematic, and periodic examinations of the workplace which are conducted by the site Supervisors with involvement of all levels of management. A formal inspection will be completed monthly on each site. Hazard Assessment Form is to be used when hazards are found from any inspections.

There will also be informal inspections that are ongoing inspections continually conducted by supervisors and workers as part of their job responsibilities. Informal inspections should be undertaken on a daily or weekly basis and should be a significant part of the responsibilities of supervisors.

Site Supervisor

• Is responsible for the overall operation of the inspections; and

• Is responsible for directing formal weekly inspections on site and for involving workers in such inspections.

Workers:

• Are responsible for participating in inspections.

• Are required to participate in the Inspection Program through informal inspections of their workplaces. As part of their daily routine, employees are expected to maintain a practiced awareness which identifies potential hazards; and

• Employees have a duty to report all hazards to the manager.

Workers Health & Safety Committee

• Participate in formal inspections for their worksite.

• All completed inspections will be documented and dated. Any controls or measures must be noted and included in inspection report. All reports will be kept on file at specific site locations.

Inspection is in place to correct unsafe acts or conditions before that cause loss or damage to any persons, environment, materials, or equipment. As an inspection is complete, a report to the employer that consists of unsafe acts and conditions that were found and the recommendations of controls to implement to fix these things. For each recommendation that is put into place must be followed up to ensure the safety of all employees involved with the inspection site.



# 7.1 Legislative Requirements

Safety inspections

**18.** (1) Regular inspections of all buildings, excavations, structures, machinery, equipment, work practices and places of employment shall be made by the employer or his or her Committee at intervals to ensure that safe working conditions are maintained and that unsafe conditions found because of the inspection are remedied without delay.

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

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

Duties of committees

**39.** A committee established under section 37

(a) Shall seek to identify aspects of the workplace that may be unhealthy or unsafe.

(a.1) shall participate in a workplace inspection that an employer is required by the regulations to conduct.

(b) May make recommendations to principal contractors, employers, workers, self-employed persons and the assistant deputy minister or an officer for the enforcement of standards to protect the health, safety, and welfare of workers at the workplace.

The *Occupational Health and Safety Regulations* require workplace inspections be conducted as often as necessary to ensure safe workplaces. According to the regulations, Spectrum Security has a duty to consult with the Safety committee regarding the scheduling of inspections and must ensure all supervisors participate in the inspections.

The purpose of workplace inspections is to identify existing and potential hazards with people and equipment, so that the hazards will be controlled or eliminated.

It is expected that the Safety committee will make recommendations to the management for appropriate corrective actions. The recommendations may be made formally or informally.

Where the Safety Committee believes it is necessary to make a formal recommendation, it will be documented and sent to the management.

Duties of employers

Management, in turn, is required to respond to the formal recommendation in writing within 30 days. Informal recommendations may be made verbally although possibly recorded in inspection note sand meeting minutes.

The written response from management must indicate agreement or disagreement with a formal recommendation. Where agreement is indicated, the matter of scheduling the implementation of the corrective action must be outlined. If the implementation cannot be scheduled for a significant period, the matter of temporary hazard controls must be discussed, and periodic updates must be provided on the progress of the implementation. Where management disagrees with the recommendation, it must state its reason for disagreement.

The Safety committee should keep records of their inspection activities.

The Safety Committee may utilize a checklist developed specifically for the workplace and inspections should generate a report of findings.

# 7.2 Types of Inspections

Inspections usually consist of walking through the workplace to determine the level of compliance with established standards for hazard controls, safe work practices and procedures. It is often advisable to speak with workers and supervisors in the area to find out if they are aware of possible problems. Unlike investigations which are usually conducted in reaction to an event, inspections are usually proactive measures.

The purpose of inspections is to:

* Identify: potential problems; equipment
* Deficiencies; improper employee action.
* Inadequacies in hazard controls or remedial actions; and
* Note the effects of change, including new hazards that were not previously identified.

Formal Inspections

Formal inspections are planned, careful, systematic, and periodic examinations of the workplace which are conducted by the Safety committee. Workplace management, in consultation the committee must decide how frequently to conduct formal inspections as warranted by the nature of the workplace. The findings of formal inspections must be recorded in an Occupational Health and Safety Manual inspection report which is filed with the committee and is kept in a filing cabinet.

Formal inspections will include Equipment Safety Checks. The checks will be reviewed to ensure no deficiencies in equipment.

Equipment included in the Safety Checks includes:

o Radios.

o Computers.

o Cell Phone (if applicable).

o Spill Kits.

o Fire Extinguishers; and

o First Aid kits.

Informal Inspections

Informal inspections are ongoing inspections continually conducted by supervisors and workers as part of their job responsibilities. Hazardous conditions are noted and are either corrected immediately or reported for corrective action. These inspections do not usually generate inspection reports. Informal inspections should be undertaken on a daily or weekly basis and should be a significant part of the responsibilities of supervisors.

Pre-Use Vehicle Checks

All vehicles on each site shall have a pre-use checklist completed before each shift’s rotation starts. Any pre-inspection reports that may identify any issues or defects with the safety of the vehicle must be reported to management immediately for the vehicle to be removed from service is receive the proper maintenance required to fix any issues.

# 7.3 Performing an Inspection.

There are four steps involved in performing an inspection of any jobsite or facility.

This step includes:

**Planning the inspection**

* review the written policy and procedure for workplace inspections.
* determine who will conduct the inspection.
* determine when the inspection will be conducted.
* review the workplace inspection checklist – revise if work processes, equipment, etc. have.
* changed and ensure ergonomic items are included.
* determine the area that will be inspected – a site map or drawing may be helpful.
* determine what will be inspected – e.g., equipment, processes, safety policies, procedures.
* determine the personal protective equipment that will be required by the inspection team.
* review previous inspection reports for present controls or health and safety concerns.

**Conducting the inspection**

* use the checklist (add items that may have been overlooked)
* do not disrupt work processes while workers are directly engaged in work.
* look for hazards which may not be easily found.
* talk to workers to determine if they have any health and safety concerns.
* report serious hazards to the supervisor immediately.

**Completing the report**

* complete the report as soon as possible after the inspection.
* clearly state the area inspected along with the time, date, and names of inspection team
* make clear and concise recommendations.
* ensure individuals are identified to complete corrective actions.
* include timelines for completing the corrective actions.
* the report should go to the employer and the OH&S committee/WH&S Committee/ designate

**Monitoring corrective actions**

* Once the inspection has been conducted and the report has been completed, it is necessary to ensure the recommended corrective measures are implemented and effective. Progress reports on the recommendations should be provided to the OH&S committee/ WH&S Committee/designate.

# 8.0 Investigation Policy

All incidents have multiple causes and effects, and the purpose of an investigation is to determine all the facts and circumstances surrounding the incident. The purpose of the

Incident Investigation Policy is to make certain that incidents are investigated in accordance with company policy and applicable legislation. This will help to control further losses of human and material resources by identifying both direct and underlying causes that lead to the incident.

This policy applies to all work-related incidents that affect company employees and others who are performing work for the company.

Incident: An event that could or does result in unintended harm or damage

All employees are required to report all incidents, including ergonomic issues, soft tissue damage and any signs or symptoms of musculoskeletal (MSI) injury to their supervisor or company contact immediately. All incidents will be reported and investigated following company and regulatory requirements.

Some incidents are immediately reportable to The OHS Division of Service Newfoundland and Labrador in accordance with Section 54 of the Newfoundland and Labrador Occupational Health and Safety Act. Incident sites should not be disturbed unless the safety of workers is at risk, as per Section 55 of The Act.

A trained and/or qualified management representative and, where available, a member of the Occupational Health and Safety Committee or Worker Health and Safety Representative, will perform an investigation of the incident. The Incident Investigation Form will be used to:

* Attempt to identify the cause of the incident; and
* Identify the corrective action required to eliminate the cause and identify the person(s) responsible for implementing the changes within a set time.

Copies of the investigation report will be forwarded to management and the OHS Committee so the recommended control plan can be reviewed and approved. If required under the regulations, a copy will be sent to the Occupational Health and Safety Division of Service Newfoundland and Labrador.

Action items, from the investigation, will be documented and tracked for completion. Implementation of action items will be monitored and reviewed by the OHS Committee. Safe work procedures will be reviewed by the OHS Committee after an incident to ensure that changes required by the

investigation findings are implemented and that they meet or exceed jurisdictional requirements.



# 8.1 Responsibilities

**Management**

* Participate in an investigation of an incident if the severity or potential severity requires action appropriate to the manager’s authority.
* Investigate an incident reported by a supervisor or worker if the severity or potential severity requires action appropriate to the manager's level of authority.
* Notify the OHS Division of Service NL of any incident required to be reported in accordance with the Occupational Health and Safety Act & Regulations or any other applicable legislation.
* Attend Investigations requiring immediate notification to The OHS Division of Service NL
* Provide Copies of investigation reports to The OHS Division, where required.
* Review and sign off on all incident investigation reports.
* Review and approve and implement controls measure to prevent reoccurrence.
* Distribute the investigation report to appropriate levels of management and the OHS Committee/WHS Representative.
* Monitor and evaluate the effectiveness of controls.

**Supervisor**

* Advise new and returning workers of the requirement to report all incidents. An annual reminder to all employees to report incidents is recommended.
* Complete the initial incident report.
* Investigate incidents, appropriate to their level of training and authority in a manner that is timely and appropriate to the circumstances and severity of the incident.
* Review and sign off on all incident investigation reports.
* Monitor and evaluate the effectiveness of controls.
* Communicate investigation findings and corrections to workers.

**Worker**

* Report to the supervisor all incidents.
* Participate in the investigation process, as appropriate.
* Provide any information that may assist in the investigation process.

**The Occupational Health and Safety Committee /Worker Health and Safety Representative**

* Ensure Incident Investigation procedures are followed.
* Ensure root causes are identified.
* Ensure recommendations for controls are appropriate.
* Recommend additional controls, if appropriate
* Monitor implementation timelines.
* Monitor and evaluate corrective actions.
* Ensure communication procedures are followed.
* Monitor for trends.
* Participate in the investigation process as appropriate or were required by the OHS Division of Service NL.

# 8.2 Incident Reporting Procedures

Spectrum Investigation and Security Limited has an obligation to make certain that all our employees, contractors and visitors are aware of the importance of and requirements for reporting all incidents. All Incidents, including ergonomic issues, soft tissue damage and any signs or symptoms of musculoskeletal (MSI) injury or occupational disease to their immediate supervisor or other authorized manager immediately. All incidents will be reported and investigated following company and regulatory requirements.

Incident - "An event that could or does result in unintended harm or damage."

The following procedure should be used when an incident occurs:

**Employees**

1. Get first aid, if necessary.
2. Report the injury/incident before leaving the workplace (if possible) to your immediate supervisor.
3. Seek timely medical treatment and advise doctor if you were hurt on the job.
4. Bring the Doctor’s Report of Injury (Form 8/10) back to your employer as soon as possible (the next working day).
5. Complete a Worker’s Report of Injury (Form 6) and submit to the Workplace Health, Safety and Compensation Commission (the Commission) as soon as possible by faxing toll free to 1-800-276-5257 or (709) 778-1302.

**Employers**

1. Transport your injured worker to appropriate medical care.
2. Complete an Employer’s Report of Injury (Form 7) and submit to the Commission (within three days).
3. Complete an Employer Incident Report Form and keep it at your workplace.
4. Determine the cause of incident and take action to prevent further injuries.
5. Work with your injured worker to develop an Early and Safe Return-to-Work plan and submit to the Commission (within five days of receiving the Doctor’s Report of Injury – Form 8/10).
6. Report Serious Injuries immediately to the OHS Division of Service Newfoundland and Labrador (as identified in Section 54 of the Occupational Health and Safety Act). Call the 24-hour Incident Reporting Line 709-729-4444.
7. Federally regulated employers must report “serious occurrences” [see Canada Labor Code Part II, Part XV, s.15.5]. Call (709) 772-5022 or after hours call collect 0-506-851-6644.

Section 54 of The Newfoundland and Labrador Occupational Health and Safety Act requires the following regarding immediate notification of Serious Accidents:

Reporting Serious Accidents

54. (1) Where an accident takes place at a workplace

(a) that results in serious injury to a person or results in the death of a person.

Or

(b) that had, or continues to have, the reasonable potential of causing serious injury to or the death of a person

(2) Where an accident is reported under subsection (1), notification shall immediately be given to the committee, the worker health and safety representative or the workplace health and safety designate.

(3) In this section and section 55 "serious injury" means

(a) a fracture of the skull, spine, pelvis, femur, humerus, fibula or tibia, or radius or ulna.

(b) an amputation of a major part of a hand or foot.

(c) the loss of sight of an eye.

(d) a serious internal hemorrhage.

(e) a burn that requires medical attention.

(f) an injury caused directly or indirectly by explosives.

(g) an asphyxiation or poisoning by gas resulting in a partial or total loss of physical control; or

(h) another injury likely to endanger life or cause permanent injury but does not include injuries to a worker of a nature that may be treated through first aid or medical treatment and the worker is able to return to his or her work either immediately after the treatment or at his or her next scheduled shift.

# 8.3 Investigation Procedures

Once an incident has occurred, an effective investigation can identify the factors that caused or contributed to the incident and provide opportunity for appropriate control measures to be implemented, to help prevent future incidents. An investigation is a systematic process conducted to prevent recurrence, not to find fault or place blame.

Responsibilities of Managers, Supervisors, Workers and Occupational Health and Safety Committee/Worker Health and Safety Representative:

* Once an incident is reported, immediate steps must be taken to respond to the scene, in accordance with the company's Emergency Response Procedures. The incident is reported by a person to the company.
* Appropriate management personnel will notify the respective authorities, as required (i.e., OHS Division or Service NL, local police authority, utility etc.).
* The immediate supervisor and other trained and authorized personnel will be responsible for securing the scene, in accordance with Section 55 of the Newfoundland and Labrador Occupational Health and Safety Act. The site must be preserved until the investigation is complete, if safe to do so.
* The direct supervisor will be responsible for completing the initial incident report. The Incident Report Form includes information required by regulations. Additional factors should be considered during the investigation, these include:

1. the exact time and location of the incident.
2. equipment, machinery, tools, or materials involved.
3. the environmental conditions.
4. any injuries and/or damage incurred.
5. the job being performed and any safe work practice or job procedure (or lack thereof).
6. the employee’s occupation and experience and personal protective equipment required.
7. the worker's shift.
8. the worker's previous incident record.
9. other individuals involved and their employer; and
10. remedial actions taken.

* The immediate supervisor of the employee involved or other authorized management personnel, will organize and lead the investigation. The investigation will be conducted by those knowledgeable about the type of work involved and, if reasonably available, with the participation of a member of the Occupational Health and Safety Committee/Worker Health and Safety Representative.
* The investigation team will include those appropriate to the severity or potential severity and type of incident. The team may include people not under the scope of this policy (for example a prime contractor representative if the incident occurred on a worksite).
* The incident site must be visited. Photographs, sketches, witness statements and other evidence collection should be undertaken promptly. Note: Incidents requiring immediate notification to the OHS Division of Service NL, will require communication with an officer regarding site access and preservation of evidence.
* Witnesses and other persons who have details regarding the incident must be interviewed. Interviews require a fair and open mind and are not meant to place blame. The interviewer should:

1. Put the interviewee at ease.
2. Keep the interview private and confidential.
3. Advise the individual of the purpose of the interview.
4. Obtain the individual's version of events on how and why the incident occurred. Ask open ended questions that require description from the interviewee.
5. Repeat the individual's story back and make notes. Attempt to clear up any inconsistencies in facts that may become evident. Do not make assumptions and use consideration to determine what occurred.
6. Ask for any suggestions for corrective action; and
7. End each interview by thanking the interviewee.

* The investigation team will analyze all evidence and information gathered, evaluating for immediate/ direct causes, underlying/root causes, and any contributing factors to the incident. A list of substandard acts/conditions and personal/job factors can be found at the end of the investigation form to assist with the review.
* The investigation team will develop recommendations for the control of all factors.
* The findings of the investigation as well as recommendations for corrective actions will be recorded on The Incident Investigation Report Form. The form must be signed by the investigation team lead.
* A copy of the investigation report will be distributed by the investigation team to senior management for review and approval/implementation of corrective actions.
* Management will forward a copy of the completed investigation form to the Occupational Health and Safety Committee/Worker Health and Safety Representative for review. Any information that could lead to the identification of the involved parties or other personal or confidential information shall be removed from the report prior to distribution to the committee or other groups.
* All investigation reports will be forwarded to the Occupational Health and Safety Committee/Worker Health and Safety Representative. The Committee/WHS Representative will review the reports for completeness and determine if additional investigation or distribution is required. Note: All investigations that require notification to the OHS Division of Service NL will be forwarded after review by the Committee/WHS Representative and approved by company management or as directed by The Division.

Training

All Managers, supervisors and Occupational Health and Safety Committee/Worker Health and Safety Representative members must be familiar with this policy and associated forms. All personnel in a position to lead an investigation team will receive additional training in the investigation process.

The requirement to report and investigate incidents will be covered during new employee orientation.

Records

Copies of the signed incident investigation reports and supplementary information will be maintained by management in a secure area.

Review

This policy should be reviewed at least annually, or when revision is required. The Occupational Health and Safety Committee/Worker Health and Safety Representative should also be involved in this review.

Incident investigation historical records should be reviewed at least annually by the Occupational Health and Safety Committee/Worker Health and Safety Representative to:

* confirm that action required was implemented.
* determine if the action was effective in prevention of recurrence.
* identify trends.
* determine areas for improvement.

# 9.0 General Safety Rules

All safety rules that are out into place by the management team of Spectrum Security are to be followed at all time. Any employee found to have been breaking these safety rules will be dealt with in the appropriate manner. These rules include the general safety rules as well as each policy that management has developed.

Violations from any rules or policies will result in disciplinary action.

* + 1. Consuming or being in possession of alcohol or illegal drugs on company premises, or on any company jobsite, is prohibited.
    2. Fighting, horseplay, practical jokes or otherwise interfering with another worker is prohibited.
    3. Theft, vandalism or any other abuse or misuse of company property is prohibited.
    4. All unsafe acts and conditions, including "near miss" incidents, are to be reported to appropriate supervision promptly.
    5. First aid treatment is to be obtained promptly for any injury.
    6. All Personal Protective Equipment that is required for that jobsite is to be always worn on all job sites.
    7. All work shall be carried out in accordance with appropriate safe work practices and your supervisor's direction.
    8. Every worker shall keep his/her work area neat, clean, and orderly.

# 9.1 Drug and Alcohol Testing Policy

It is the purpose of Spectrum Security to help provide a safe and drug-free work environment for our clients and our employees. With this goal in mind and because of the serious drug abuse problem in today’s workplace, we are establishing the following policy for existing and future employees of the company.

**Workers, while on Company property or engaged in Company or Client business, are prohibited from:**

* The use, possession, solicitation for, or sale of alcohol, Marijuana including Cannabis and its metabolites, illicit drugs, or illicit drug paraphernalia.
* Having a blood alcohol concentration which is equal to or greater than .02 grams per 100ml.
* Presence in the body of illicit drugs and/or marijuana including cannabis, or their metabolites, in the amount of between 2 and 5 nanograms.
* Use or possession of prescription drugs or authorized medical marijuana if the worker was not the lawful recipient of the prescription or authorization.
* Possession, use, solicitation for, or sale of legal or illegal drugs or alcohol away from the Company or customer premises, if such activity or involvement adversely affects the employee’s work performance, the safety of the employee or of others, or puts at risk the Company’s reputation.
* The presence or misuse of any detectable amount of prohibited substance in the employee’s system while at work, while on the premises of the Company or its customers, or while on company business. “Prohibited substance” include illegal drugs, Cannabis (Marijuana)**,** alcohol, or prescription drugs not taken in accordance with a prescription given to the employee. **NOTE: any persons that claims to have the illicit drugs listed above for medicinal purposes must provide their employer with a doctor’s note explaining that the prescription will in no way affect/impede the workers ability to do their job safely and effectively.**
* Being unfit for scheduled work due to the use or after-effects of alcohol, illicit drugs, marijuana, prescription or authorized drugs or any intentional misuse of medications.

Spectrum reserves the right to ask any employee to undergo a Drug and Alcohol test under the following circumstances:

**For Cause Testing**

The company may ask an employee to submit to a drug test at any time it feels that the employee may be under the influence of drugs or alcohol, including, but not limited to, the following circumstances: evidence of drugs or alcohol on or about the employee’s person or in the employee’s vicinity, unusual conduct on the employee’s part that suggests impaired or influence of drugs or alcohol, negative performance patterns, or excessive and unexplained absenteeism or tardiness.

**Post-Accident Testing**

Any employee involved in an on-the-job accident of injury under circumstances that suggest possible use or influence of drugs or alcohol in the accident or injury event may be asked to submit to a drug and /or alcohol test. “Involved in an on-the-job accident or injury” means not only the one who was injured, but also any employee who potentially contributed to the accident or injury event in any way.

If an employee is tested for drugs or alcohol outside of the employment context and the results indicate a violation of this policy, the employee may be subject to appropriate disciplinary action, up to and possibly including discharge from employment. In such a case, the employee will be given an opportunity to explain the circumstance prior to any final employment action becoming effective.

For Employees Working for Clients with other Drug and Alcohol Policies, many of the Company’s clients have their own Drug and Alcohol Policies that the Company’s employees may be asked to abide by. In these circumstances, employees will be notified of the client’s policies and are required to follow them.

**Pre-employment Testing:**

Some sites may require testing prior to commencement of work, as outlined in site conditions.

**Note: Complete detailed test results regarding levels of alcohol and/or drugs will be provided to the employer from the designated testing laboratory.**

Definitions

**Zero Tolerance**

Zero Tolerance applies to Workers found to be in possession and/or uses of drugs and alcohol while at work and involved in the following situations:

1. Use or are in possession of alcohol, Cannabis (Marijuana), illegal drugs or illegal drug paraphernalia.
2. Found to be under the influence of alcohol, Cannabis (Marijuana) or illegal drugs.
3. Distribute, offer to sell, or sell illegal drugs or illegal drug paraphernalia, or engage in unauthorized distribution, offering or sale of prescription medications.
4. Under the influence of legal drugs, prescription or non-prescription which infers with their judgment, coordination, or concentration.
5. Required to report to the supervisor or management of any breech of this policy or , which has been observed or have been made aware off. Reporting must be done immediately.
6. Any person who has tested non-negative for illegal or illicit drugs, alcohol or any medications found to be causing impairment at the time of testing.

**Workplace Substance Abuse**

Work site substance abuse is defined as:

**The use of potentially impairing substances to the point at which it has the potential to adversely affect performance and/or safety on the site.**

The impairment may either be directly through intoxication and/or residual effects, or indirectly through social and/or health problems. Substance abuse is considered to occur when a drug is taken without medical reasons, or if a substance impairs and/or jeopardizes the health or safety of oneself or others. Abuse can occur by using a substance too much, too often, for the wrong reasons, at the wrong time, or at the wrong place.

The range of substances that are abused is wide and can include (buts is not limited to) alcohol, cocaine (including crack), marijuana, other illicit drugs, solvents, and misuse of prescription drugs or over the-counter medications.

**Safety Sensitive Positions**

The Canadian Human Rights Commission defines a Safety Sensitive Position as:

**One in which incapacity due to drug or alcohol impairment could result in direct and significant risk of injury to a Worker, others, or the environment.**

A construction industry site, particularly a Site of this magnitude is a particularly high-risk operation. In-keeping with this definition, the specific duties and accountabilities is safety sensitive within the site, which include but is not limited to the following:

1. Where the duty requires operating or working with moving machinery, equipment or tools or mobile equipment.
2. Where the duty requires the Worker to handle hazardous chemicals (eg.WHMIS) hazardous materials or dangerous materials.
3. Where the duty requires the Worker to work in an area where blasting activities may occur.
4. Where the duty requires working knowledge of the lock-out procedures, confined space procedures or any other safety procedures required on the Site.
5. Where the duty requires a Worker to work from time to time in an area where mobile equipment or other equipment is operating, or construction activities are occurring.
6. Where the duty requires a Worker to travel in, on or around Site.
7. Where the duty requires the Worker to wear personal protective equipment
8. Where the duty requires more than normal physical effort
9. Where the duty requires the Worker to work above normal elevation
10. Where the duty requires the Worker to work alone
11. Where the Worker is responsible for the welfare and safety of others
12. Where the Worker puts themselves or others at risk of injury or death
13. Where the Worker can put the environment at risk placing the employer at significant liability risk
14. Where the duties require supervision or support of any of the above activities.

All Workers working on the Site are working in safety sensitive positions and will submit to a drug and alcohol testing procedure, which meets Vale Standards in the following circumstances:

1. Where there is reasonable cause
2. Post-Incident

**Persons seeking Site Access, if granted will be working in a safety sensitive position and accordingly each person will submit to a drug and alcohol testing procedure.**

# 9.2 Non-Smoking Policy

The overall Health and wellbeing of our employees is a top priority for Spectrum Security. Therefore, we at Spectrum expect that all our employees abide by a strict non-smoking policy.

In accordance with the Occupational Health & Safety Regulations governing Canadian employees, we are committed to providing a safe and healthy work environment for our employees. Smoking is proven to cause serious health risks for both the person smoking, and those who inhale secondhand smoke.

Therefore, as a Spectrum employee, you must herby sign and agree that you will refrain from smoking while wearing any uniform bearing the Spectrum name, on the property of our clients, and on Spectrum time.

Any Spectrum employee who is reported to be in breach of our nonsmoking policy is subject to disciplinary action. This can come in the form of a verbal warning, a written warning, or termination. In some cases, the nature and severity of the breach can lead to permanent dismissal.

# 9.3 Disciplinary Policy

The failure of any employee to abide by Spectrum Security safety rules, excluding actions which constitute immediate dismissal, will result in the following disciplinary action:

First Violation: Verbal warning noted in personnel file.

Second Violation: Formal written reprimand with copy in personnel file.

Third Violation: Formal written reprimand with copy in personnel file and possible suspension.

Fourth Violation: Dismissal

The recurring failure of any employee of Spectrum Security to conduct themselves in accordance with any safety rules will result in their removal from the job site and possible dismissal.

Grounds for Immediate Dismissal

1. Possession or consumption of alcohol or illegal drugs.
2. Arriving for work or remaining at work when ability to perform the job safety is impaired.
3. Possession of firearms
4. Fighting, horseplay and practical jokes
5. Theft and vandalism
6. Damaging, disabling, or interfering with safety, firefighting or first aid equipment

# 10.0 Emergency Response Plan

It is the policy of Spectrum Investigation and Security (1998) Limited to have each of its workplace achieves a level of emergency preparedness so that immediate and appropriate response will be taken in the event of a local emergency. Emergency preparedness will:

* Prevent, or at least minimize, harm coming to any employee from a foreseeable emergency.
* Minimize damage to equipment, facilities, and the environment; and
* Minimize the time required to restore full services after the disruption caused by an emergency.

The supervisor is responsible for ensuring that each workplace has developed and implemented emergency preparedness and response procedures specific to the workplace. Supervisors are responsible to ensure that:

* Individuals are designated and trained.
* Response procedures are developed.
* Employees are trained in emergency procedures.
* Hazard assessments are regularly conducted; and
* Concerns raised are addressed.

Every worker must complete an emergency first aid course. It is the responsibility of workers to provide first-aid to an injured worker if they have the training to do so and it is also safe for the worker to enter the area of the injured worker.

For immediate transportation of an injured worker call 9-1-1. If transportation by ambulance is not available, it is the responsibility of the supervisor on site to get the employee to medical attention.

A copy of the emergency plan will be posted in a prominent place, alone with a list of emergency telephone numbers at each worksite.

All worksites and vehicles shall be equipped with a first aid kits to meet the Occupational Health and Safety-First Aid Regulations, As Well As Fire Extinguishers.

# 10.1 Emergency Response Resources

The following are a list of on-site resources that shall be available and cleared identified to all workers on all jobsites:

* First Aid Kits - adequate for the number of employees on site
* Fire Extinguishers – Suitable for the type of product on site

An off-site emergency resource is the local 9-1-1 system. For most construction worksites the 9-1-1 system will play a large role in the controlling of emergency situations.

Muster Station

In case of any emergency all workers shall gather at the identified Muster Station. A head count will be completed at that time to ensure all workers are account for.

Muster Station Location:

# 10.2 Emergency Reporting and Evacuation Procedures

Emergencies vary depending on the site location and the hazards are that present through-out the work being completed.

The following is a list of emergencies that must be reported to the site supervisor immediately:

* Medical
* Vehicle accident
* Fire
* Chemical Spill
* Bomb Threat
* Violence in the Workplace

## 10.2.1 Medical Emergencies

Medical emergencies include life threatening situations as well as the following:

* Broken Bones
* Compound Fractures
* Eye Injuries
* Lacerations
* Excessive Bleeding
* Head Injuries
* Serious Allergic Reactions
* Chest Pain
* Cardiac Arrest
* Inhalation of Toxic Substance
* Heat Stroke/Heat Exhaustion/Heat Cramps
* Seizure
* Unconsciousness
* Cessation of Breathing

If you or someone in your office experiences a medical emergency:

1. Dial 911. Provide detailed information on the location of the ill or injured person.
2. Be prepared to provide the following information to emergency personnel:

* Name (yours and if possible, the victims)
* Location of injured person (building and room)
* Description of symptoms or type of injury
* Victim’s current condition
* Sequence of events leading to the emergency, if known

1. Unless trained, do not attempt to render any first aid before assistance arrives.
2. If trained, use training to respond appropriately to the emergency at hand.
3. If trained, and the victim has no pulse and is not breathing, use CPR.
4. Unless safety dictates, do not attempt to move a victim.
5. Major medical history (heart condition, asthma, diabetes, allergies, medications, victim’s doctor, etc.)
6. Remain at the scene after emergency personnel have arrived to provide information.
7. Planning for such emergencies includes being trained in emergency first aid procedures and CPR.

## 10.2.2 Vehicle Accident

If you or someone are involved in a vehicle accident

1. Dial 911. Provide detailed information on the location of the accident.
2. Be prepared to provide the following information to emergency personnel:

* Name (yours and if possible, the victims)
* Location of injured person (building and room)
* Description of symptoms or type of injury
* Victim’s current condition
* Sequence of events leading to the emergency, if known

1. Unless trained, do not attempt to render any first aid before assistance arrives.
2. If trained, use training to respond appropriately to the emergency at hand.
3. Remove the vehicles from the roadway if possible.
4. Wait for police and emergency services to arrive.
5. Report the incident to your immediate supervisor or the General Manager immediately

## 10.2.3 Fire or Explosion Procedures

Response to Fire, Suspected Fire, and Audible Fire Alarms

* If a burning odor or smoke is present, pull a fire alarm to activate the fire alarm system.
* Dial 911 and report the location of the fire and the material burning if known.
* Report this information to fire and police personnel as they arrive.
* If possible, shut off gas in your area.
* If you can help control the fire without personal danger and have received training, act with available fire extinguisher. If not, leave the area.
* Evacuate the building (if applicable)
* Do not push or shove.
* Do not delay locating personal items, files, or equipment.
* Do not proceed to the basement.
* Do not use the elevator.
* Close doors behind you to confine the fire.
* Quickly check nearby rooms and restrooms to ensure everyone knows of the alarm.
* Proceed to the designated Muster Station.
* Return to the building only when given the “all clear” by proper emergency personnel. DO NOT assume that when the audible alarm ceases it is safe to reenter the building.

If Your Clothes Catch on Fire

* Stop what you are doing.
* Drop to the ground.
* Roll to smother flames.

Perform First Aid as Necessary

* Do not move those with extreme injuries.
* Get help from emergency personnel.
* Perform CPR, if trained to do so.

## 10.2.4 Hazardous Material or Chemical Spill Response

A hazardous material spill is a spill in which there is a significant amount of a hazardous material that has been released or one in which the release of the substance cannot be controlled. Examples of hazardous materials in quantities that would be considered a spill are more than one gallon of bleach, more than 100 ml of sulfuric acid, over one gallon of gasoline, and any quantity of mercury. Examples of infectious materials include blood and other bodily fluids.

Hazardous Material Spill Response:

1. Dial 911,
2. If the hazardous material meets your skin, immediately flush the affected area with large amounts of water for at least 15 minutes, and then seek medical attention.
3. If possible and if trained, stop the source of the hazardous material/chemical.
4. Evacuate the immediate area, closing doors behind you.
5. Unless trained, DO NOT attempt to clean up the spill yourself.
6. Make yourself available to emergency personnel to supply critical information to aid in clean up.
7. Provide as much of the following information as possible:

* Where has the hazardous material spill occurred? Specify the floor, room number, and location in room.
* What material has been spilled?
* What is the state of the material (i.e., solid, liquid, gas, combination)?
* Is any of the hazardous material escaping from the spill location in the form of chemical vapors/fumes or running or dripping liquid?
* Has there been a fire and/or explosion?
* Has anyone been injured? If so, how many people and what type/s of injuries have occurred?

## 10.2.5 Bomb Threat

**When A Bomb Threat Is Called In, Perform the Following Actions:**

1. Remain calm.
2. Attempt to keep the caller on the line if possible.  Ask him/her to repeat the message.  Record every word spoken by the person and use the telephone bomb threat checklist (Attachment II).
3. Ask for the exact location where bomb has been or is going to be planted.
4. Get as much information as possible about the caller, e.g., vocal characteristic, race, sex, group affiliation, why the bomb was placed.
5. Clues from background noises, which might indicate caller's identification and location.
6. Immediately after the caller hangs up, report the threat to **911**, your supervisor, and /or the Emergency Response Team.
7. Remain available, as law enforcement personnel will want to interview you.
8. Wait for further direction from the Police.
9. Do not spread rumors.

**When A Written Threat Is Received, Perform the Following Actions:**

1. Remain calm.
2. Avoid handling it unnecessarily to preserve possible fingerprint(s), handwriting or typewriting, paper, and postal marks. These will prove essential in tracing the threat and identifying the writer.
3. While written messages are usually associated with generalized threats and extortion attempts, a written warning of a specific device may occasionally be received; it should never be ignored.
4. Contact the Police.
5. Wait for further direction the policy.
6. Do not spread rumors.

## 10.2.6 Violence in the Workplace

Workplace violence can start as a small incident involving negative remarks and inappropriate behavior. These small incidents can escalate to physical or psychological violence. Knowing some basic communications skills and some problem-solving strategies can help prevent problems from occurring or can stop a small problem from getting bigger or out of control:

* It is important that you try to avoid escalating the situation. Establish ground rules if the unreasonable behavior continues. Calmly describe the consequences of violent or aggressive behavior. Suggest alternatives and avoid giving commands or making conditional statements.
* Tell the person that you:
  + Do not like the tone of the conversation.
  + Will not accept abusive treatment.
  + Will end the conversation if necessary.
* Tell the person that you will ask him or her to leave (the building, your office, etc.) or that you will leave.
* If the behavior continues, end the conversation, and inform your immediate supervisor or manager immediately.
* Do not return to the situation if you believe the person may be a physical threat.

**Procedure**

**If you Feel Threatened:**

* Politely and calmly end the interaction in a non-threatening way, if possible.
* Know what back-up and advice (e.g., from your manager, supervisor, or a co-worker) is available to help you when handling a difficult individual.
* Get help:
  + Send for security or someone more senior.
  + Use a silent alarm.
* Keep a record of incidents (dates, time, locations, possible witnesses, what happened, your response). You do not have to have a record of events to file a complaint, but a record can strengthen your case and help you to remember details over time.

Employees are encouraged to immediately bring to the attention of a management representative any issue that has the potential to create violence in the workplace. Any form of violence or threat of violence whether actual or reasonably perceived involving a Spectrum employee, customer or occurring in the workplace, must be reported to a management representative.

# 10.3 Emergency Telephone Numbers

**Ambulance:**

* **Emergency 911**
* **Health Science Centre (709) 777-6321**

**Fire Department:**

* **Emergency 911**
* [**Central Station**](http://www.sjrfd.ca/LinkClick.aspx?link=88&tabid=79)**(709) 758-3229**
* **Brookfield Station (709) 758-3236**
* **Gould’s Station (709) 758-3240**
* **Kenmount Station (709) 576-8591**
* **Kent’s Pond Station (709) 576-8592**
* **Mount Pearl Station (709) 576-8034**
* **West Station (709) 576-8501**

**Police:**

**Emergency 911**

**RNC (complaints) (709) 729-8000**

**Poison Information Centre:**

**24hr- (709) 722-1110 or 1-866-727-1110**

**Municipal Water Department:**

**(709) 729-0891**

**Government Services (OHS Branch):**

**(709) 729-4444**

**Environmental Emergencies Canadian Coast Guard:**

**1-800-563-9089 (24 hours)**

**Utilities**

**NL Power –709- 737-5408**

**Bell Aliant – 1-877-779-3737**

**Rogers – 709- 757-6353**

**General Manager – Jeff Chislett – 709-738-3535**

# 10.4 First- Aid Policy

First aid is the immediate treatment necessary for the purpose of preserving life and minimizing the consequences of injury or illness until expert medical assistance can be obtained. First aid also includes the initial treatment of minor injuries, which will not need treatment by a medical practitioner.

The aims of first aid are threefold:

* Saving life by prompt and initial action.
* Preventing the injury or condition from deteriorating.
* Helping recovery through reassurance and protection from further danger.

Spectrum Investigation and Security (1998) Limited will implement and maintain effective systems for ensuring the provision of adequate and appropriate first aid equipment and facilities at individual workplaces and during on-site activities.

All employees at Spectrum Investigation and Security (1998) Limited workplaces must supply a current One Day Emergency First Aid certificate within 4 months of employment with Spectrum Security.

The necessary materials, equipment and facilities shall be provided and maintained in accordance with the regulations. This will involve ensuring that first-aid equipment is suitably marked, easily accessible and available in all places identified by the assessment.

Each workplace should have at least one first aid box supplied with enough first aid materials suitable for the circumstances, and a body spills kit. Large sites will require more than one first-aid box.

First-aid boxes should be easily accessible, if possible, near to hand washing facilities. First aid boxes must only be used to store first aid materials and nothing else. Tablets and medications should not be kept.

First aiders must regularly inspect the contents of first-aid containers and the contents must be restocked as soon as possible after use. Care should be taken to discard items safely after the expiry date has passed.

# 11.0 Early and Safe Return to Work Policy

In accordance with legislative requirements Spectrum Investigation and Security (1998) Limited are committed to cooperate in returning an injured worker to safe and suitable employment.

The company will meet its obligation to an injured worker as soon as soon as possible after the injury to jointly work on developing a return-to-work plan. The return-to-work plan will be based on the individual needs of each worker and will incorporate all relevant information. Any options identified will be assessed in accordance with the Workplace NL’s Policy RE-18 Hierarchy of Return to Work and Accommodation and section 89 of the Workplace Health Safety and Compensation Act.

If an employee is unable to return to their pre-injury position because of a work-related injury, then the company will consider alternate options in accordance with section 89.1 of the workplace Health Safety and Compensation Act as well as Human Rights legislation.

All workers will be treated fairly and consistently and are expected to participate and co-operate in the RTW program.

All supervisors are expected to understand and value the importance of returning an injured worker to work and must aid where appropriate.

Any personal information received or collected that can lead to the identification of an injured worker will be held in the strictest confidence. Information of a personal nature will be released only if required by law or with the approval of the worker who will specify the nature of the information to be released and to whom it can be released.

This statement reflects the views of both management and employees of this organization and has been developed in full consultation with the employee representatives. Any issues arising from the goals in this statement will be monitored and evaluated through a joint consultation mechanism.

This statement will be reviewed annually and may be updated or changed as required.



# 11.1 Early and Safe Return to Work Program

Spectrum Investigation and Security (1998) Limited recognize the importance of developing and implementing a workplace-based return to work program. Our program allows supervisors and workers to take the proactive approach in assisting injured workers to return to safe and productive work activities as soon as possible following an injury.

**Roles and Responsibilities**

Our company is committed to assisting injured employees return to productive and meaningful employment through the return-to-work program. This process can and will involve regular communication and interaction between those responsible for the program.

Spectrum Investigation and Security (1998) Limited in consultation with the Occupational Health and Safety Committee have identified a list of roles and responsibilities for the parties who will be involved in the return-to-work process.

This outline is meant to provide general direction to those involved in the return-to-work process and is subject to change.

***Employer***

* Provide general direction and support for the return-to-work program.
* Ensure resources are available for effective function of the return-to-work program.
* Promote the return-to-work program.
* Assist in resolving return to work issues if requested.
* Contact employee as soon as possible after the injury.
* Ensure form 7 is filled out and submitted to Workplace NL within 72 hours.
* Develop an early and safe return to work plan after reviewing functional abilities (8/10 form) information with the injured worker. This information must be submitted to Workplace NL within five days.
* Maintain communication with the injured worker on a regular basis. An injured worker can expect to receive a phone call from the safety advisor on a weekly basis and after each medical appointment.
* Coordinate and maintain all appropriate documentation.
* Act as the main liaison between the employer and all parties involved in the return-to-work process.

***Supervisors***

* Ensure the injured worker is participating in the return-to-work plan as agreed.
* Monitor the employee while participating in the return-to-work plan.
* Record any changes to the return-to-work plan.
* Report any changes or issues to the Safety Advisor.

***Occupational Health and Safety Committee***

* Identifies appropriate accommodations or alternative work assignments for injured workers.
* Reviews return to work plans to identify issues.
* Assist in dispute resolution when necessary.
* Audit, measure performance and develop and modify the program as required.
* Provide information to workers, supervisors, and employers.

***Injured Worker***

* Contacts the employer as soon as possible after the injury occurs and maintains effective communication. The injured worker is expected to contact the Safety Advisor weekly and after each medical appointment.
* Brings 8/10 form to the Safety Advisor within 24 hours
* Assist the employer and Safety Advisor to identify suitable and available employment.
* Accept suitable employment when identified.
* Provide Workplace NL any information requested concerning the return to work, including information about any disputes or disagreements which arise during the early and safe return to work process.

***Workplace NL***

Communicate to the workplace parties their statutory obligations to co-operate in the early in the return-to-work process.

* Ensure the return-to-work plans are achieving the hierarchy of return-to-work priorities (refer to Policy RE-18) and are consistent with the worker’s functional abilities (refer to Policy RE-03)
* Monitor activities, progress, and co-operation of the workplace parties.
* Proactively manage the medical rehabilitation of the worker in consultation with the worker and health care providers.
* Determine compliance with the obligation to co-operate and where applicable, re-hire.
* Offer/provide dispute resolution.
* Communicate regularly and effectively with the workplace parties and health care providers.

***Health Care Providers***

* Provide the workplace parties and Workplace NL with functional abilities information.
* Provide and worker and Workplace NL with medical information.
* Identify the most appropriate method of treatment for the injury.
* Ensure the worker receives timely treatment.
* Ensure return to work is discussed throughout recovery.

**Definitions**

A series of definitions is provided to assist workplace parties during the return to work planning and to promote a consistent understanding of the program types to be utilized in the hierarchy of return to work.

***Accommodation****:* Accommodation is any change or adaptation to the work, hours of work, work duties or workplace, and includes the provision of equipment or assistive devices. In any specific case, accommodation can include, but is not limited to, any of the options outlined in this policy or an appropriate combination thereof.

***Alternate Duties****:* Alternate duties are non-pre-injury duties within the worker’s functional abilities.

***Alternative Work****:* A different job or bundle of duties (not the pre-injury job or duties) that are suitable and are provided to accommodate a worker who has temporary or permanent functional restrictions because of the injury.

***Assistive Devices****:* Assistive devices include aids/attachments specifically designed for the worker and/or required by the worker to perform job-related activities.

***Ease Back****:* A gradual return to pre-injury hours of work achieved by increasing the number of hours worked over a defined time frame agreed upon by the workplace parties utilizing the functional abilities information relating to the worker. While the pre-injury hours of work vary, the pre-injury duties are the same.

***Modifications****:* Changes to job schedule, equipment, organization of work, and/or facilities.

***Modified Work****:* Changing the job duties of the pre-injury position required to accommodate the worker’s functional restrictions because of the injury. Modified work includes altering or removing some duties; however, the worker is still working primarily in his or her pre-injury position.

**Injury Reporting System**

Knowing what to do following an injury can have a significant impact on the outcome for the injured worker. Statistics show that workers who follow a consistent process following an injury usually recover from the injury and ultimately return to the workplace earlier. Minimizing the impact of workplace injuries can provide both social and financial benefits to employers and workers alike.

Implementing an injury reporting system within our workplace provides a process for managing injuries immediately assists in enforcing our commitment to assisting worker who have been injured while at work. An injury reporting system is a process that provides consistent direction and information to supervisors and workers following a work-related injury. The injury reporting system produced by management in consultation with the occupational health and safety committee is a step-by-step guide that outlines the events which are to occur after a worker has been injured This process is as follows:

1. A worker is injured.
2. The injured worker **notifies supervisor or general manager immediately** after the injury occurs.
3. A trained first aider will provide first aid or determine if transportation to the hospital is necessary. Transportation of the injured worker will occur by either company vehicle or ambulance. The method of transportation will be determined by the trained first aider on scene, based on the severity of the injuries.
4. The supervisor will notify the safety advisor that a worker has been injured.
5. The worker advises their physician they were injured while at work.
6. The injured worker returns the physician 8/10 form to the safety advisor within 24 hours.
7. The injured worker completes a Worker’s Report of Injury (form 6) and submits it to Workplace NL (form available online)
8. The safety advisor completes an Employers Report of Injury (form 7) and submits it to Workplace NL (form available online)
9. The injured worker and safety advisor complete an in-house incident report, to be kept on file in the office.
10. The injured worker, injured workers supervisor and safety advisor complete the ESRTW program based off the information found in functional abilities section on the completed 8/10 form (form available online)

The injury reporting system will be discussed with workers on a regular basis during new hire orientations and toolbox talks. Additionally, a copy of the system will be posted on the safety board in each work area.

**Reporting a Serious Injury**

Provincial legislation requires that all incidents which resulted in “serious injury” or a fatality or had the potential to do so be reported immediately to Service NL, Occupational Health and Safety Branch. Reports can be made by calling, 729-4444 or 1-800-563-5471.

The Newfoundland and Labrador Occupational Health and Safety Act and Regulations define a “serious injury” as an injury that poses at least one of the following consequences:

|  |
| --- |
| * An injury that places a life in jeopardy |
| * An injury which causes a worker to suffer unconsciousness for any period |
| * A fracture to a major bone including the skull, pelvis, femur, fibula or tibia, the radius, or the ulna |
| * A serious internal hemorrhage or any substantial external loss of blood |
| * An amputation of a major part of the body including an arm, leg, hand, foot, finger, or toe |
| * The loss of sight in an eye |
| * A burn to a major portion of the body that requires medical attention |
| * An asphyxiation or poisoning by gas resulting in a partial or total loss of physical control |

An injury is not considered serious to a worker if it may be treated through first aid or medical treatment and the worker is able to return to his or her work either immediately after the treatment or at his or her next scheduled shift.

It is the safety advisor’s responsibility to ensure Service NL is notified in the case of a serious injury. If there is doubt as to whether an incident should be reported, the safety advisor should consult with a representative from Service NL.

Similarly, to any incident, in the aftermath of an incident resulting in a serious injury the safety advisor will notify the members of the occupational health and safety committee.

**Immediate Management Action Following a Serious or Fatal Accident**

Spectrum Investigation and Security (1998) Limited in consultation with the occupational health and safety committee have developed a procedure to ensure proper communication and notification following an incident which results in a serious injury. This series of events will occur after first responders have arrived and the injured worker is in transit to receive medical aid. The steps are as follow:

* The safety advisor, in the event they are not aware up until this point.
* The injured workers next of kin, as previously identified on the workers Employee Card.
* The injured workers immediate supervisor, in the event they are unaware up until this point.
* The Owner of the Spectrum Investigation and Security (1998) Limited
* Service NL, Occupational Health and Safety Branch

**Necessary Forms**

***Physician’s Report – 8/10 Form***

Any worker who seeks medical attention for an injury suffered at work is required to inform their physician. A physician will complete an 8/10 form during a physical exam for a newly sustained injury, a recurring injury or as a progress report. A copy (yellow) of this form must be returned to the safety advisor after each medical appointment. ***Please note***, a physiotherapist, massage therapist or occupational therapist may also complete an 8/10 form. These must also be returned to the safety advisor.

***Workers Report of Injury – Form 6***

Workers, upon returning to the safety advisor following an injury are required to present the 8/10 form. At this time, the worker may also return the completed Form 6, or they may request assistance from the safety advisor in filling out the form. This form is available on the Workplace NL website, workplaceNL.ca > Forms >Injury Report – Workers (Form 6). Once completed, the safety advisor will forward Form 6 to Workplace NL via fax.

***Employers Report of Injury – Form 7***

The safety advisor has the responsibility to complete the Form 7. They may find this form on the Workplace NL website, WorkplaceNL.ca>Forms>Injury Report – Employers (Form 7) or on Workplace NL connect.

***Early and Safe Return to Work Plan***

Both the safety advisor and the injured worker are jointly responsible for completing an Early and Safe Return to Work Plan and submitting it to Workplace NL. The purpose of this plan is to outline a work schedule that fall within the restrictions discussed in section D (Return to Work Status) of the 8/10 form. This schedule will include duties, hours and pay. This form can be found on Workplace NL’s website, WorkplaceNL.ca> forms> Early and Safe Return to Work Plan or on Workplace NL Connect.

Forms completed on Connect will be submitted electronically, all other forms will be submitted via fax to Workplace NL.

**Return to Work Planning Protocol**

Return to work planning is a constant approach through a pre-defined process that usually consists of two main activities. The first is accommodating the injured workers functional limitations, and the second is coordinating the necessary services for the injured worker. Spectrum Investigation and Security (1998) Limited with support from the occupational health and safety committee has composed a return-to-work planning protocol which outlines the steps to be taken to ensure a worker is rehabilitated and returns to work in the fastest most efficient manner. This protocol is as follows:

* All employees must report injuries to their supervisors in accordance with the injury reporting system.
* Upon receiving notice of injury from the worker, the supervisor will make all reasonable efforts to ensure that the worker receives the most appropriate treatment such as first aid or transportation to the hospital.
* The supervisor will notify the safety advisor that a worker has been injured.
* It is the workers responsibility to bring the employer’s copy of Form 8/10 (yellow copy) to the safety advisor for review. In all but exceptional cases the employee is required to submit this form with **24 hours**. If this cannot be done in person the worker must contact them to make other arrangements.
* Upon receipt of the 8/10 Form the safety advisor will review the functional abilities information with the worker. This information will be used in conjunction with the workers job description, work requirements and Workplace NL legislation to identify suitable work.
* The employer and the injured worker will consider all possible job options in accordance with the Hierarchy of Return to Work as outlined in Workplace NL’s Policy RE-18.
* Once the safety advisor and the injured worker agree on job duties to be performed and the schedule, an ESRTW plan will be sent to Workplace NL within **5 days**.
* The injured worker’s supervisor will be notified of the return-to-work plan and will be responsible for monitoring the employee’s progress while at work. Any problems or issues will be reported to the safety advisor.
* Communication will be weekly and after each medical appointment throughout the return-to-work process and the injured worker is expected to notify the safety advisor if there is a change in their condition.

**Accommodation Guidelines**

Our company will facilitate the return-to-work process in accordance with Workplace NL’s PolicyRE-18 Hierarchy of Return to Work and Accommodation. This hierarchy will be used as a guideline when making decisions regarding the return-to-work process. The goal is to always keep the injured worker as closely linked to their pre-injury position as possible. There are times when a situation may occur where the hierarchy does not provide the most effective method of assisting the injured employee. In these exceptional cases the circumstances will be reviewed, and a decision will be made in consultation with the injured employee, Workplace NL and any other parties that may be participating in the return-to-work process.

The safety advisor will review the functional abilities information provided on the 8/10 form with the worker. As a reminder the 8/10 form is due within 24 hours after each doctor’s appointment so that return-to-work opportunities may be explored. Any restrictions will be compared to the pre-injury job requirements to determine whether the pre-injury job must be modified to accommodate the injured employee’s functional abilities. We may request the assistance of an external agency in this process such as an occupational therapist or a return-to-work facilitator from Workplace NL. The use of ergonomic equipment and other assistive devices will be considered as well.

Once the duties and hours have been agreed upon by both the safety advisor and the employee, the details of the plan will be forwarded to Workplace NL via the ESRTW plan within five days of receipt of the form 8/10.

The Safety Advisor will be responsible for monitoring the progress of the plan until the employee has returned to full hours and duties at work. Any significant changes or adjustments must be reported as soon as possible. Spectrum Investigation and Security (1998) Limited will continue to accommodate any changes in the plan in accordance with the Workplace NL requirements.

**Permanent Accommodations**

If an employee reaches a maximum medical recovery and is unable to return to their pre-injury position, Spectrum Investigation and Security (1998) Limited will determine whether there are any other job opportunities which match the employee’s current functional abilities. This type of accommodation would be on a permanent basis. The Safety Advisor will review all relevant legal requirements such as WHSC Act, and the Human Rights Code. A meeting will be arranged between all parties to discuss the options. Each case will be reviewed in its own merits and decisions made on a case-by-case basis. Should the employee not be able to be accommodated then they may end up going through Labor Market Re-Entry Program which will help identify other occupations that the employee may be able to do.

**Dispute Resolution**

We recognize that from time-to-time situations may arise where the employer and or the employee may experience a dispute that they may not be able to resolve. If the issue in dispute impedes or delays the return-to-work process or the re-employment obligation that this guideline will be used as the first step in attempting to resolve the dispute to the satisfaction of all parties. The employer and/or the employee have the right to contact Workplace NL at any time to seek assistance.

The safety advisor will act on behalf of Spectrum Investigation and Security (1998) Limited when handling disputes with the injured worker. All reasonable steps will be taken to attempt to resolve the dispute at this level. This may include contacting or reviewing information form the internal and external resources such as health care providers, Workplace NL, the occupational health and safety committee supervisors and owners. If the dispute cannot be resolved internally, Workplace NL must be contacted and made aware of the issues at hand. The Workplace NL Facilitator will act as a mediator in these cases and will likely set up a meeting with the parties involved to discuss the issues.

**Joint Mechanism for Consultation**

To attain a higher success and satisfaction rate with our return-to-work program, Spectrum Investigation and Security (1998) Limited will engage in joint and meaningful consultation with their employees throughout the use of the program. The company will invite workers to participate in the consultation mechanism for the return-to-work program. These representatives will be chosen by their coworkers, and at least half of the consultation team will be represented by the workers.

The purpose of the joint consultation mechanism is to engage in meaningful consultation, representative of the both the employer and worker sides, on the return-­to-work program, and to provide advice on complex return-to-work issues. The mechanism is not intended for day-today issues related to an individual return-to-­work plan, but rather on the program.

Our company believes that a joint mechanism will provide opportunities for input, and assess the input from all parties when designing, implementing, monitoring, evaluating, and/or revising the Program. From the employers point-of-view it will strengthen the ability to assist injured workers, improve worker relations, maximize internal resources, and increase the success of the Return-­to-Work Program. From the workers point-of-view it will allow for employee involvement in the Return-to-Work Program and increase employee morale because of the value of their input.

**Evaluation and Communication**

To ensure an adequate and reliable return to work program, Spectrum Investigation and Security (1998) Limited in consultation with the occupational health and safety committee have developed several protocols to ensure the return-to-work program is successful. These protocols will ensure that our program is as adequate and efficient as possible, and any overlooked deficiencies or challenges are promptly addressed.

***Evaluation Protocol***

Our company’s occupational health and safety committee, in consultation with Workplace NL has developed an assessment which will be completed by workers who participate in the return-to-work program. This assessment will assist in determining the effectiveness of the program as well as the workers knowledge of how the program works. Once the assessment has been completed and reviewed by the occupational health and safety committee, any deficiencies will be acknowledged and address in the appropriate manor.

***Communication Protocol***

Our goal at Spectrum Investigation and Security (1998) Limited, is ensure our workers are aware of the program regardless of if it is ever necessary for them to participate. Our return-to-work program will be communicated to our workers in through toolbox talks, job coaching and our new hire orientation.

# 12.0 Maintenance Policy

Spectrum Security is committed to the maintenance of all equipment. The equipment shall be properly maintained to reduce risk of injuries to employees or damage to property.

Supervision shall ensure that all preventive maintenance is carried out by qualified personnel according to established schedules and that records are maintained.

All employees shall regularly check all tools and equipment that they are working with and shall take out of service any tools or equipment that poses a hazard due to a need for repair. This equipment shall be tagged as “Out of Service” to prevent other employees from using them.

The safety information in this policy does not take precedence over Occupational Health and Safety Act, Regulations and Codes of Practice. All employees should be familiar with the Occupational Health and Safety Act.

# 12.1 Vehicle Inventory Regular Maintenance

All vehicles on each site shall have a pre-inspection checklist completed before each shift’s rotation starts. Any pre-inspection reports that may identify any issues or defects with the safety of the vehicle must be reported to management immediately for the vehicle to be removed from service is receive the proper maintenance required to fix any issues.

All operators of each vehicle must ensure that regular maintenance to each vehicle is completed when needed and all records kept of all services.

Each vehicle must undergo the following regular maintenance:

• Oil changes every 3000 km.

• Tire Rotations every 6000 km.

• Bi-Annually complete vehicle inspection of all part and fuel levels.

• Replacement of braking equipment as required by the complete vehicle inspection; and

• Any other maintenance that may be required by the certified garage.

All deficiencies of vehicles that may be found of each vehicle must be recorded on the pre-inspection checklists. When a deficiency is reported by an employee or supervisor it must be entered in for service and then the supervisors on site are required to ensure that the maintenance is completed

Spectrum Investigations and Security (1998) Limited will maintain a comprehensive program of regular maintenance.

**13.0 Harassment Prevention Plan**

Spectrum Investigation & Security (1998) Ltd Management is committed to providing a safe, respectful and harassment free work environment for all staff and customers. No one has the right to harass anyone, at work or in any situation related to employment with this organization.

What is Harassment?

Workplace harassment means inappropriate, vexatious conduct or comment by a person to a worker that the person knew or ought to have known would cause the worker to be humiliated, offended, or intimidated. It can take place at work or in a situation connected to work; can happen repeatedly or only once; be intended or unintended; and can be written, verbal, physical, a gesture or display, or any combination of these. It can include electronic messages to a person or social media posts.

Examples of harassing behaviour may include:

• Unwelcome conduct, comments, gestures or contact which causes offense or humiliation • Misusing power or authority

• Referring to a person using terms or pronouns that do not align with the person’s affirmed gender

• Physical or psychological bullying which creates fear or mistrust, or which ridicules or devalues the individual

• Excluding, intimidating, or isolating individuals

• Making inappropriate gestures/comments

• Making inappropriate sexual advances

• Discriminating based on gender

• Cyberbullying, such as posting offensive or intimidating messages through social media or email

• Deliberately setting the individual up to fail

Reasonable and fair actions taken by an employer or supervisor, in a respectful manner, to manage and direct workers is NOT harassment. Examples of this include:

• Changing work assignments

• Scheduling, assessing, and evaluating work performance

• Inspecting workplaces • Implementing health and safety measures

• Taking disciplinary action such as dismissing, suspending, demoting, or reprimanding with just cause

Section 22 – 24.2 of the Newfoundland and Labrador OHS Regulations requires every workplace to have a harassment prevention plan.

Employer/Supervisor Responsibilities:

Management at Spectrum Investigation & Security (1998) Ltd is committed to eliminating, where possible, or otherwise, minimizing the hazard of workplace harassment.

Managers and supervisors are responsible for a safe work environment, free of harassment. The employer, supervisors and managers are required to apply and comply with the harassment prevention plan and associated procedures.

Reported incidents of workplace harassment will be investigated in accordance with the procedure outlined below. Spectrum Investigation & Security (1998) Ltd will protect workers from retaliation and provide support to workers when workplace harassment occurs.

Worker rights and responsibilities:

Workers are entitled to work free of harassment at Spectrum Investigation & Security (1998) Ltd.

Workers have the responsibility to treat each other with respect and not engage in bullying or workplace harassment. We ask that anyone who experiences harassment or sees another person harassed report it to Lyndon Quinton company president.

Workers are responsible to:

• Not engage in bullying or workplace harassment

• Report observations or experiences of bullying or harassment

• Participate in education and training

• Comply with the prevention plan and associated procedures

Confidentiality and Workers’ rights under various laws

The company and its managers will not identify a complainant, an alleged harasser, or any circumstances about a complaint, including personal information, to anyone, unless it is necessary:

• For the investigation

• For corrective action relating to the complaint

• Where required by law

This plan is not intended to discourage a worker from exercising his or her rights under the Human Rights Act, 2010, the Criminal Code (Canada) or any other law of the province or of Canada.

The prohibited grounds outlined in the Human Rights Act, 2010 include discrimination based on:

• Race • Colour

• Nationality • Ethnic origin

• Social origin • Religious creed

• Religion • Disability (including perceived disability)

• Age • Sexual orientation

• Sex (including discrimination on the basis that a woman is or may become pregnant)

• Gender identity • Gender expression

• Marital status • Family status

• Source of income • Political opinion

Reporting procedures

If you believe you are being harassed, tell the person harassing you to stop, if it is safe and you feel comfortable to do so. You can do this in person or in writing. If you cannot deal with them directly, or if your request is unsuccessful, follow the procedures for reporting harassment. Complete the Harassment Report Form when making a formal complaint of harassment. Report the incident or situation to your supervisor or Lyndon Quinton company president or Gary Chatman company vice president.

Harassment by Employer/Supervisor

The complainant should report the alleged incident or situation to Newfoundland and Labrador Human Rights Commission. Incidents of harassment should be reported as soon as possible, but no later than 12 months after the most recent incident.

Investigation

The purpose of an investigation is to gather additional information related to the reported incident of harassment and to determine whether harassment has occurred. Once the complaint has been received, it will be investigated thoroughly and promptly by Lyndon Quinton company president or Gary Chatman company vice president within the following timelines:

• When a complaint is received by the supervisor or the external third party, a meeting will be scheduled with the complainant within five days to begin the investigation process.

• Interviews with the complainant, the alleged harasser and any witnesses will be conducted to confirm the details of the alleged harassment within 15 days.

• Investigation report will be available within 90 days to the complainant and the alleged harasser.

• Both parties will have 14 days to respond to report.

After this period has expired, corrective actions may be taken.

Where this timeline cannot be met, reasons for the delay and the projected new date of completion must be documented for the file.

Notification of Results

When the investigation is complete, Lyndon Quinton company president or Gary Chatman company vice president will inform the person who filed the complaint and the alleged harasser of the results of the investigation in a timely manner.

Corrective action for Harassers

Employees who harass another person will be subject to corrective action by the employer. Corrective actions include, but are not limited to:

• Employer to identify corrective actions Support for workers Employees who have been affected by workplace harassment may be supported through:

• Employer to identify supports

Education and Training

Spectrum Investigation & Security (1998) Ltd commits to making sure all its employees, supervisors and managers are trained in harassment prevention and the company’s harassment prevention plan.

Monitoring

Spectrum Investigation & Security (1998) Ltd will monitor this plan, review annually, and adjust whenever necessary. If you have any concerns with this plan, please bring them to the attention of Lyndon Quinton company president or Garry Chatman company vice president.

Harassment Report Form

Complainant information

Name: Department:

Position Title: Contact information:

Alleged Harasser Information

Name: Department:

Position Title: Contact information:

Description of the Alleged Harassment:

Please describe, in as much detail as possible, the incident (s) of alleged harassment. You may attach additional sheets if required. Please include:

• Who was involved?

• What was specifically said or done (words, tone, actions, etc.)

• When it happened (dates and time)

• Where it happened

• Any witnesses to the incident(s) (name and contact information, if possible)

• How it impacted you

• If it was reported to management with the following details:

* name of manager/supervisor:
* date and time of reporting:
* actions taken:
* other relevant details:

Temporary measures

Do you believe that the employer needs to take any interim measures while the Incident, is under investigation?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please describe what you think is necessary to prevent this situation from happening again and why.

Other Processes

Have you initiated any other processes to deal with these allegations of harassment (i.e., one-on-one discussions with the alleged harasser, grievance, Human Rights Commission, legal action, etc.)?

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# 14.0 Violence Prevention Policy

Spectrum Investigation and Security (1998) Limited, in cooperation with our employees (and unions), is committed to ensuring a healthy, safe work environment for all our employees; every employee is entitled to employment free of violence. Spectrum Investigation and Security (1998) Limited, is committed to taking all reasonable precautions necessary to ensure the safety and well-being of its employees. Spectrum has developed a companywide policy intended to prevent workplace violence and to deal quickly and effectively with any incident that might occur. Spectrum will take such disciplinary measures as the employer deems appropriate against any person under the employer’s direction who subjects any employee to workplace violence.

Workplace violence constitutes any act in which a person is abused, threatened, intimidated, or assaulted in his or her employment.

Examples of workplace violence include:

* Threatening behavior - such as shaking fists, destroying property or throwing objects.
* Verbal or written threats - any expression of intent to inflict harm.
* Harassment - any behavior that demeans, embarrasses, humiliates, annoys, alarms, or verbally abuses a person and that is known or would be expected to be unwelcome. This includes words, gestures, intimidation, bullying, or other inappropriate activities.
* Verbal abuse - swearing, insults or condescending language.
* Physical attacks - hitting, shoving, pushing, or kicking.

Rumors, swearing, verbal abuse, pranks, arguments, property damage, vandalism, sabotage, pushing, theft, physical assaults, psychological trauma, anger-related incidents, rape, arson, and murder are all examples of workplace violence. Spectrum Investigation and Security (1998) Limited will not tolerate any form of workplace violence.

**Responsibilities**

**Responsibility of Employees:**

It is the responsibility of all Spectrum employees to assist in the prevention and control of workplace violence. Employees have the responsibility to ensure their own safety and that of their colleagues at work. All employees are encouraged to be alert to the possibility of violence on the part of employees, former employees, customers, and strangers.  It is essential that all employees are familiar with policies and procedures, equipment, and precautions adopted to combat the risk of workplace violence. Employees shall place safety as their highest concern and shall report all acts of violence and threats of violence.

**Responsibility of Management:**

It is the responsibility of a director, manager, or any person within this company supervising one or more employees to take immediate and appropriate action to report, deal with, and prevent incidents of workplace violence whether brought to their attention or personally observed. Under no circumstances should a legitimate complaint be dismissed or downplayed, or the complainant told to deal with it personally. Remedial action will be taken to ensure that similar incidents are prevented in the future.

**Preventive Measures**

**Identifying Warning Signs:**

Workplace violence can start as small incidents involving negative remarks and inappropriate behavior. It may escalate to physical or psychological violence. It is much easier to prevent violence by stopping small incidents than trying to deal with the aftermath of a major crisis. It is very difficult to predict when a person will become violent. While not all people will show warning signs, some types of behaviors and physical signs can serve as indicators that a situation could turn violent. Look for multiple warning signs and for signs of escalation. Each situation is unique and professional judgment or outside assistance may be necessary to determine if intervention is necessary. If you are concerned about a person who demonstrates some or all the characteristics listed below, act; report your concern to your supervisor immediately.

It is extremely important to understand that the following behaviors do not mean a person will become violent, but they may indicate that the person is experiencing high levels of stress. Always take note if there is a change in their behavior patterns, the frequency and intensity of the behaviors are disruptive to the work environment or if the person is exhibiting many of these behaviors, rather than just a few:

* Crying, sulking or temper tantrums.
* Disregard for the health and safety of others
* Disrespect for authority.
* Faulty decision making
* Testing the limits to see what they can get away with.
* Swearing or emotional language.
* Making inappropriate statements.
* Red faced or white faced.
* Sweating
* Trembling or shaking
* Clenched jaws or fists
* Exaggerated or violent gestures
* Shallow or rapid breathing
* Scowling, sneering or use of abusive language.
* Violating your personal space

**Preventing Escalation**:

Workplace violence can start as a small incident involving negative remarks and inappropriate behavior. These small incidents can escalate to physical or psychological violence. Knowing some basic communications skills and some problem-solving strategies can help prevent problems from occurring or can stop a small problem from getting bigger or out of control:

* It is important that you try to avoid escalating the situation. Establish ground rules if the unreasonable behavior continues. Calmly describe the consequences of violent or aggressive behavior. Suggest alternatives and avoid giving commands or making conditional statements.
* Tell the person that you:
  + Do not like the tone of the conversation.
  + Will not accept abusive treatment.
  + Will end the conversation if necessary.
* Tell the person that you will ask him or her to leave (the building, your office, etc.) or that you will leave.
* If the behavior continues, end the conversation, and inform your immediate supervisor or manager immediately.
* Do not return to the situation if you believe the person may be a physical threat.

**Procedure**

**If you Feel Threatened:**

* Politely and calmly end the interaction in a non-threatening way, if possible.
* Know what back-up and advice (e.g., from your manager, supervisor, or a co-worker) is available to help you when handling a difficult individual.
* Get help:
  + Send for security or someone more senior.
  + Use a silent alarm.
* Keep a record of incidents (dates, time, locations, possible witnesses, what happened, your response). You do not have to have a record of events to file a complaint, but a record can strengthen your case and help you to remember details over time.

Employees are encouraged to immediately bring to the attention of a management representative any issue that has the potential to create violence in the workplace. Any form of violence or threat of violence whether actual or reasonably perceived involving a Spectrum employee, customer or occurring in the workplace, must be reported to a management representative.

**Dealing with the Complaint**:

1. If required, immediate medical attention will be sought for victims of violence.
2. Where appropriate, Management will report the incident to the police.
3. Once a complaint is received, an investigation will be undertaken immediately, and all necessary steps taken to resolve the problem.
4. Spectrum will not disclose the name of a complainant or the circumstances related to the complaint to any person except where disclosure is necessary for the purposes of investigating the complaint or taking disciplinary measures in relation thereto.
5. The complainant and the accused will both be interviewed along with individuals who may be able to provide relevant information.
6. If the investigation reveals evidence to support the complaint of workplace violence, the offender will be disciplined appropriately. Discipline may include suspension or dismissal, and the incident will be documented in the offender’s file. Where the complaint is filed in good faith, NO documentation whatsoever will be placed in the complainant’s file, whether the complaint is upheld or not.
7. If the investigation fails to find evidence to support the complaint, there will still be documentation concerning the complaint placed in the file of the accused.
8. Any complainant who has lost opportunity for job advancement, promotion, wage raise, etc., due to workplace violence, will have his or her qualifications re-examined in a fair, unbiased manner.

**Victim Support**

Management is expected to offer support to victims of workplace violence and shall use their discretion to grant a victim leave time for medical, court, or counseling appointments related to trauma and/or victimization. The following options will be considered:

* Flex Scheduling
* Vacation Leave
* Sick Leave
* Leave without pay.

Spectrum Investigation and Security (1998) Limited seeks to provide a safe, healthy, and rewarding work environment for its employees. Workplace violence will not be tolerated within this company. If you feel you have been a victim of workplace violence, contact us, we want to hear from you.

(709) 738-3535

**\*PLEASE REFER TO APPENDIX A FOR “QUICK REFERENCE SHEET” REGARDING ENCOUNTERING VIOLENT PERSONS DOs AND DON’Ts**

# 15.0 Personal Protective Equipment Policy

The following will be observed and practiced by the company when the company undertakes any job or contract. Supervisors are responsible for ensuring the enforcement of this policy.

* All employees, guests and visitors will wear CSA approved safety glasses, CSA approved safety boots, long pants, long sleeved shirts; CSA approved hard hats and any other specialty PPE appropriate to the hazard and required for the job site.
* All PPE used by this company will be within the requirements of the Occupational Health and Safety Act and Regulations and CSA standards.
* All PPE used by this company will be maintained in accordance with manufacturer’s instructions and requirements.
* Company issued PPE will be inspected at time of issue and before each use by the employee using the PPE.
* All PPE that is of questionable reliability, damaged, or in need of service or repair will be removed from service immediately.
* All PPE that has been removed from service will be tagged “**OUT OF SERVICE**”. Any PPE tagged “**OUT OF SERVICE**” will not be returned to service until repaired and inspected by a qualified person.
* The company will maintain appropriate inspection and service logs for specialty PPE (i.e., fall protection equipment and respiratory protection).
* No piece of PPE will be modified or changed contrary to manufacturer’s instructions or specifications or the Occupational Health and Safety Act and Regulations.

The safety information in this policy does not take precedence over the Occupational Health and Safety Act, Regulations and Codes of Practice. All employees should be familiar with the Occupational Health and Safety Act and Regulations.



# 16.0 Environmental Policy

Spectrum Security is committed to protecting human health and the environment through regulatory compliance and the continuous review of our construction operations. We intend to meet this commitment through the application of the following principles:

* Introduction of environmental requirements as an integral part of our business operations,
* Minimization of health hazards,
* Evaluation and assessment of our construction operations to provide environmental protection,
* Assessment of potential environmental risks,
* Evaluation and monitoring of our environmental performance to applicable standards,
* Providing education and training, and
* Maintaining an effective communication and reporting system.

It is our priority to encourage our customers, suppliers, and all business associates to do the same. Not only is this sound commercial sense for all; it is also a matter of delivering on our duty of care towards future generations.



# 17.0 Hearing Conservation Policy

Spectrum Security is committed in protecting their employees from all noise hazards during their time of employment with this company.

Where the level of noise is sufficiently intense, it will pose a potential hazard to the hearing of employees who are exposed to it for long periods of time. Too much noise exposure can cause a temporary loss of hearing, and, if the noise exposure is repeated, the loss gradually becomes permanent.

When noise is determined to be a factor, the first appropriate action is to implement engineering control to reduce noise to acceptable levels, or through administrative controls such as limiting the amount of time an individual worker is exposed excessive noise also job rotation should be considered, or to isolate the worker from any noise that is over the industry standard of 85 decibels over an 8-hour day.

When hearing protection is deemed necessary and it is not practicable to implement controls the employee shall under last resort require the use of proper personal protective equipment to reduce the noise hazards. This personal protective equipment will include three forms of hearing protection:

* Disposable ear plugs (made of pliable material, one size fits all but can only be used once).
* Permanent plugs (must be fitted to provide a good seal but can be washed and reused); and
* Earmuffs (when properly fitted and worn, generally provide more protection than plugs)

Each employee will be required to partake in any training and education in the health hazards of noise, along with the proper use, fitting, care, and maintenance of the hearing protection. This training will be documented, and those records shall be kept by the employer while the employee is employed by the employer.

The client or the employer will be required to inform the employees of high noise levels; they shall post and maintain signs at entrances or around the areas where persons are exposed to high noise levels more than the industry standards of 80 decibels over an 8-hour day. These signs shall clearly state that a noise hazard exists and shall state the personal protective equipment that is required.

All employees shall wear supplied hearing protection at any part of the site that is deemed as necessary by the client for hearing protection. Any employee that does not wear hearing protection when required will be disciplined.

This hearing conservation policy will be reviewed annually to ensure that the policy is being managed effectively and ultimately that hearing protection users are being adequately protected.

# 18.0 Monthly Safety Report Summary

**Worker/Employee Statistics**

Report for month of: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Total number of Workers hired: \_\_\_\_\_\_\_\_\_\_

Number of Orientations completed: \_\_\_\_\_\_\_\_\_\_

Site Tours completed: \_\_\_\_\_\_\_\_\_\_\_

List new Trainings conducted during this month:

* Fire Extinguisher Training \_\_\_\_\_
* Workers Health & Safety Committee Training \_\_\_\_\_
* First-Aid Training \_\_\_\_\_\_\_\_
* WHMIS \_\_\_\_\_\_\_
* MFSO(Marine Facility Security Officer)
* ISPS (International Shipping Port Security)
* Security Services Certificate
* FAC Certified\_\_\_\_\_\_\_\_\_
* Basic Firefighting Skills\_\_\_\_\_\_\_\_\_

Number of Right to Refuse \_\_\_\_\_\_\_\_\_\_

Signed\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Position\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Dated\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_