

OCCUPATIONAL HEALTH and SAFETY PROGRAM

ARKAY CONTRACTING LTD.

updated JULY 2021

STRIVING for an INJURY-FREE WORKPLACE

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OCCUPATIONAL HEALTH and SAFETY POLICY

Arkay Contracting Ltd. is committed to the health, safety, and welfare at Arkay's places of work. It is Arkay management's objective to maintain its workers' right to a safe and healthy environment through cooperation with clients.

Arkay management is responsible for providing a safe workplace and to implement the company OHS program. Management shall adhere to, promote, and educate, lead-by example, and support the company's OHS program in its entirety. All workers shall be informed of the company's expectations regarding health and safety, both verbally and through written media.

Arkay workers shall abide by the company's OHS program and follow WorkSafeBC regulations. Workers shall conduct themselves in a manner that does not endanger themselves, other workers, or cause property damage. Workers must report unsafe conditions immediately to the site management and Arkay management.

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POLICIES

HANDOUTS

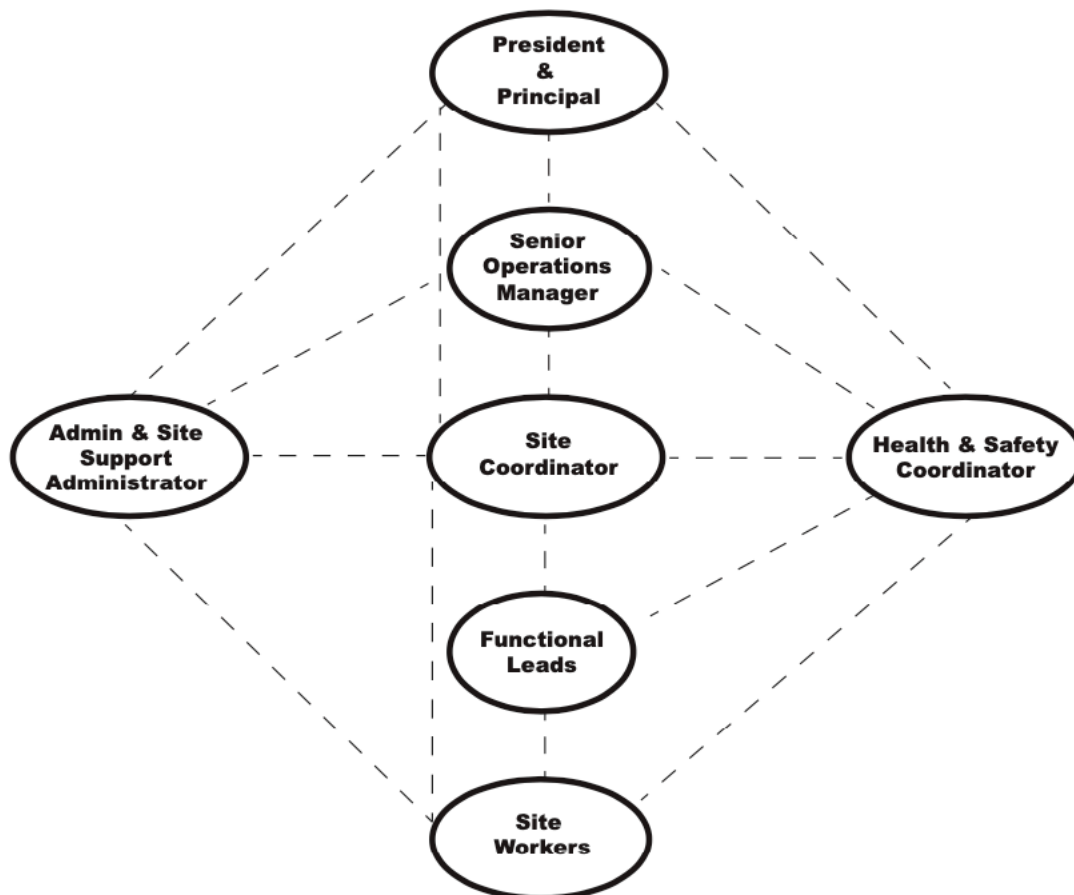
FORMS

COMMUNICABLE DISEASE PREVENTION

ACRONYMS

- CSO Construction Safety Officer
- COR Certification of Recognition
- DMI Disability Management Institute
- EP Emergency Preparedness
- EPP Emergency Preparedness Plan
- FLHA Field Level Hazard Assessment
- OFA Occupational First Aid Attendant
- OHS Occupational Health and Safety
- PPE Personal Protective Equipment
- RTW Return-To-Work
- SJP Safe Job Procedure
- SWP Safe Work Procedure
- TBT Toolbox Talk
- WSBC WorkSafeBC

ORGANIZATIONAL CHART



ELEMENT 1:

COMPANY HEALTH & SAFETY POLICY AND ROLES, RIGHTS & RESPONSIBILITIES

Arkay provides temporary construction workers to select clientele. Arkay works for the prime contractor by providing its own workers for a specified duration and role.

Effort is made to check each site before Arkay workers are assigned to a project. This inspection is done by any member of the Arkay management team to ensure the site is operating safely and with the necessary resources for workers. Any short comings will be shared with the site management.

To establish and maintain compliance with safety standards and responsibilities based on the laws and standards within the province of British Columbia and compliance with the Workers Compensation Act, Occupational Health and Safety Regulations, and others as applicable. In the interim, as Arkay works under the prime contractor, we fall within the scope of the Site Risk Register developed for all construction projects in the Lower Mainland. Arkay will develop a company specific Risk Register over a phased period for its own operations.

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4. WORKERS' RIGHTS

RESOURCES

Legal Ref.

WCA	3(3) General duties of employers, workers and others
OHSR	115(1)(a) General duty of an employer / Right to Refuse Unsafe Work 19.24 / 19.25

Forms

OHS/E01.a	Health and Safety Policy Statement
OHS/E01.b	Environmental Policy Statement
OHS/020.a	Job Description – Health and Safety Coordinator
OHS/020.b	Job Description – Construction Safety Officer
OHS/020.c	Job Description – Occupational First Aid Attendant
OHS/023	Guidelines

Safe Work Procedures

SWP 011	Disciplinary Action for OHS Violations
SWP 019	General Rules Construction

Toolbox Talks

TBT 030	Health and Safety Responsibility
TBT 073	The Right to Refuse Unsafe Work

3. RESPONSIBILITIES

3.1 ARKAY MANAGEMENT TEAM

Arkay strives to follow WorkSafeBC [Guideline 115 General Duties of Employers](#):

115 General duties of employers

- (1) Every employer must
 - a. ensure the health and safety of
 - i. all workers working for that employer, and
 - ii. any other workers present at a workplace at which that employer's work is being carried out, and
 - b. comply with this Part, the regulations, and any applicable orders.
- (2) Without limiting subsection (1), an employer must
 - a. Remedy any workplace conditions that are hazardous to the health or safety of the employer's workers,
 - b. Ensure that the employer's workers:
 - i. Are made aware of all known or reasonably foreseeable health or safety hazards to which they are likely to be exposed by their work,
 - ii. Comply with this Part, the regulations, and any applicable orders, and
 - iii. Are made aware of their rights and duties under this Part and the regulations,
 - c. Establish occupational health and safety policies and programs in accordance with the regulations,
 - d. Provide and maintain in good condition protective equipment, devices and clothing as required by regulation and ensure that these are used by the employer's workers,
 - e. Provide to the employer's workers the information, instruction, training, and supervision necessary to ensure the health and safety of those workers in carrying out their work and to ensure the health and safety of other workers at the workplace,
 - f. Make a copy of this Act and the regulations readily available for review by the employer's workers and, at each workplace where workers of the employer are regularly employed, post and keep posted a notice advising where the copy is available for review,
 - g. Consult and cooperate with the joint committees and worker health and safety representatives for workplaces of the employer, and
 - h. Cooperate with the Board, officers of the Board and any other person carrying out a duty under this Part of the regulations.

3.2 ARKAY HEALTH and SAFETY COORDINATOR

The Arkay Health and Safety Coordinator works to promote a positive safety culture and philosophy, and to develop strategies to maintain a safe work environment. The Health and Safety Coordinator will work with site safety representatives, address Arkay worker questions and report back to Arkay management regarding issues of non-compliance, new standards, and changes in WorkSafeBC etc. If there is an immediate threat to a worker's health, safety or welfare, the Health and Safety Coordinator will offer any expertise that might be helpful. Any procedural changes will be made in consultation with the Arkay management team, the prime contractor and or client to ensure consistency with the existing health and safety management ethos.

The Health and Safety Coordinator is responsible for:

- Managing the OHS program,
- Conducting a due diligence bridging exercise with the client to ensure there is a clarity of duties and expectations within the umbrella arrangement,
- Developing and reviewing OHS statistics and records,
- Applying the Hierarchy of Controls (pages 15-16) approach to address and manage any foreseeable hazards in the workplace,
- Attending and participating in safety meetings with Arkay and clients,
- Conducting accident, incident, and near-miss investigations,
- Providing safety orientations to new and young workers,
- Reviewing safety engineering controls and personal protective equipment (PPE),
- Preparing Arkay for COR accreditation,
- Developing systems based on the **Plan; Do; Check; Act** (PDCA) principals, and
- Preparing HSE Targets and Objectives.

3.3 ARKAY WORKERS

- Read, understand, and comply with this OHS program, policies, and procedures.
- Use appropriate controls such as safety equipment or PPE when required.
- Report unsafe conditions to site supervisor.
- Refuse unsafe work if they feel in danger.
- Report all incidents, accidents, and near-misses to the site CSO and Arkay's Health and Safety Coordinator.

4. WORKERS' RIGHTS

4.1 RIGHT to KNOW

All workers have the right to know the risks associated with specific tasks, workplace exposures and any information regarding Arkay's OHS program. If any worker is unclear about any policy, process, or objective after reading this document, they are to bring their concerns to Arkay's Health and Safety Coordinator or any other member of the Arkay management team.

4.2 RIGHT to REFUSE

All workers have the right to refuse any unsafe work.

4.3 RIGHT to PARTICIPATE

All workers have the right to participate in the development, implementation, and verification of this OHS Program.

4.4 PROCEDURE for REFUSAL

- Arkay workers must not carry out any duties or operate any tools, vehicles, or equipment if they feel this will create a serious health and safety hazard to themselves or others.
- A worker who refuses to carry out a work process or operate a tool, vehicle or equipment must immediately report the circumstances of the unsafe condition to the site supervisor or CSO and notify Arkay management.
- The Health and Safety Coordinator and site management team may be involved in the process.
- If the issue is not resolved, the worker will contact Arkay management who will then investigate the matter in the presence of the worker and a representative.
- If the investigation is still not resolved, the worker can continue to refuse to work; site and Arkay management then reports the situation to the prime contractor's safety manager.
- If this issue remains unresolved, WorkSafeBC will be contacted.
- In the event of a disagreement over whether the work is safe or unsafe, a WorkSafeBC officer will make the decision.
- A worker cannot be subjected to discriminatory action because the worker has acted in compliance with this policy and WorkSafeBC requirements.
- Temporary assignment to alternative work may be possible until the matter is resolved.

ELEMENT 2:

WORKPLACE HAZARD IDENTIFICATION; RISK ASSESSMENT and CONTROL

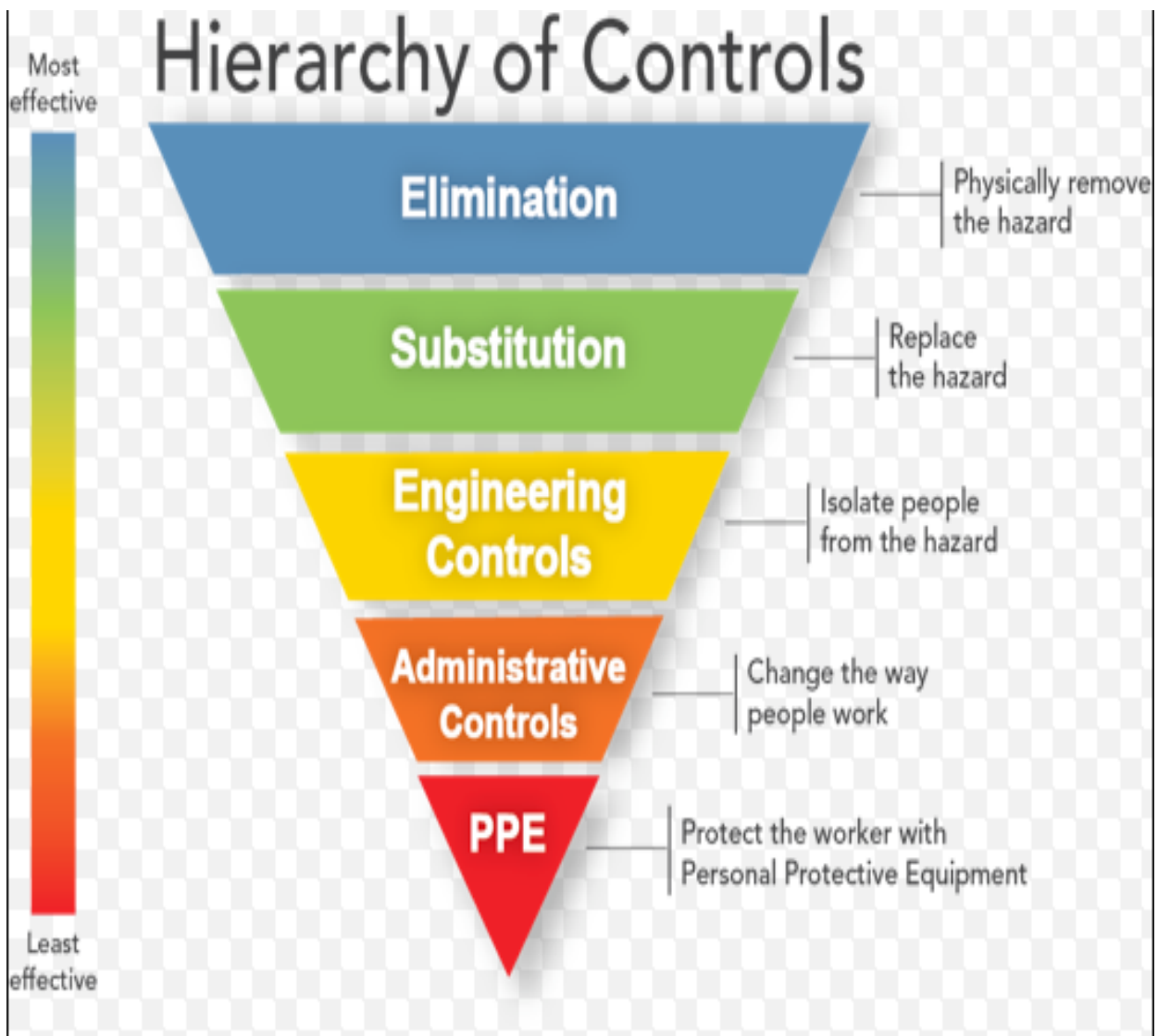


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5. **HAZARD and RISK CONTROL MEASURES**

RESOURCES

Legal Ref.

OHSR G9.9-1 Hazard Assessment / 19.24 / 19.25 / G4.48 - 50

Forms

FLHA Form
Jobsite Inspection Form
Safe Working Procedures

Toolbox Talks

TBT000 Toolbox talk meeting checklist
TBT048 Written fall protection plan
TBT068 Noise – How loud is it
TBT073 Right to refuse unsafe work

1 RESPONSIBILITIES

1.1 ARKAY MANAGEMENT TEAM

- Review the OHS program to ensure it remains relevant.
- Engage with workers to complete necessary site-based documentation such as FLHA's.
- Participate in the development and review of the hazard assessment and Risk Registry.
- Ensure all workers are informed of workplace hazards.
- Participate in the review of site-specific hazard assessments.
- Conduct formal and informal training with Arkay workers.
- Conduct regular site visits.
- Conduct in-depth accident, incident, and near-miss investigations.

1.2 ARKAY WORKERS

- Conduct FLHA's prior to every task (routine and non-routine) and as operations and procedures change.
- Report all new hazards to site supervisor or CSO.
- Workers are not to endanger themselves by performing any work they are not competent, or familiar with.

2. HAZARD IDENTIFICATION

Site and Arkay management are responsible to lead, educate and involve Arkay workers in identifying site hazards including the review of tools and equipment.

2.1 CONSIDERATIONS WHEN IDENTIFYING the HAZARDS of JOB TASKS

- **The Worker:**
 - Have workers been trained appropriately and adequately?
 - Have workers' abilities been evaluated to verify knowledge and competence?
 - What type of tasks will workers be conducting?
- **Site Environment:**
 - Are there any staging or storage concerns?
 - Are there specific conditions that need to be dealt with such as weather conditions?
- **Site Materials:**
 - What types of products are being used?
 - WHMIS
- **Site Equipment, Machinery, and Tools:**
 - What types of equipment will be used?
 - Maintenance log
- **Specialized PPE:**
 - Does the task require specialized PPE, e.g., fall protection?
 - Does the worker have adequate training?
 - Is the equipment in good working order?

2.2 HAZARD CATEGORIES

- **Chemical:** flammable gasses, reactive hazards, corrosives, fumes
- **Physical:** falling objects, falls from heights, moving vehicles/equipment, noise, electrical, powerlines, items under pressure, hot/cold
- **Biological:** animals, bacteria, viruses, food
- **Ergonomic:** lifting, straining, bending
- **Psychosocial:** work demands, stress of pace, bullying

3. ASSESSING HAZARDS and DETERMINING RISK

Once hazards have been identified, a risk assessment must be completed. Factors include toxicity, exposure to the source, and the production demands.

3.1 PRIORITIZING HAZARDS

- **Severity:** Defines the outcome an event will have on workers and the environment
- **Probability:** The chance of an event taking place
- **Frequency:** Frequency is how often the task or job is to be performed; there is a link between how often a worker is exposed to the hazard and the likelihood of an incident occurring

See matrix below for more information.

		Impact			
		Minor	Moderate	Major	Extreme
Probability	Rare	Low	Low	Medium	Medium
	Unlikely	Low	Medium	Medium	Medium
	Moderate	Medium	Medium	Medium	High
	Likely	Medium	Medium	High	High
	Very likely	Medium	High	High	High

3.2 HAZARD CLASSIFICATION and RISK RESPONSE

Using the prioritizing hazards table in 5.2 (opposite):

- When the condition fits into the high category, the CSO will stop work to determine and implement effective controls.
- When the condition fits into the medium category, the CSO will conduct a toolbox talk and continue work with caution.

When the condition fits into the low category, the CSO will conduct work with caution.

4. HIERARCHY OF CONTROLS

4.1 ELIMINATION

A hazard may be eliminated by taking a different approach to performing a task or by changing the design.

4.2 SUBSTITUTION

With hazardous materials, it may be possible to use a similar product that is less hazardous than the one previously specified. The same applies to machines, equipment, and tools.

4.3 ENGINEERING

Engineering controls such as equipment and ventilation are processes with built-in safety controls such as ventilation, machinery guards, dust filters or water suppression and barricades.

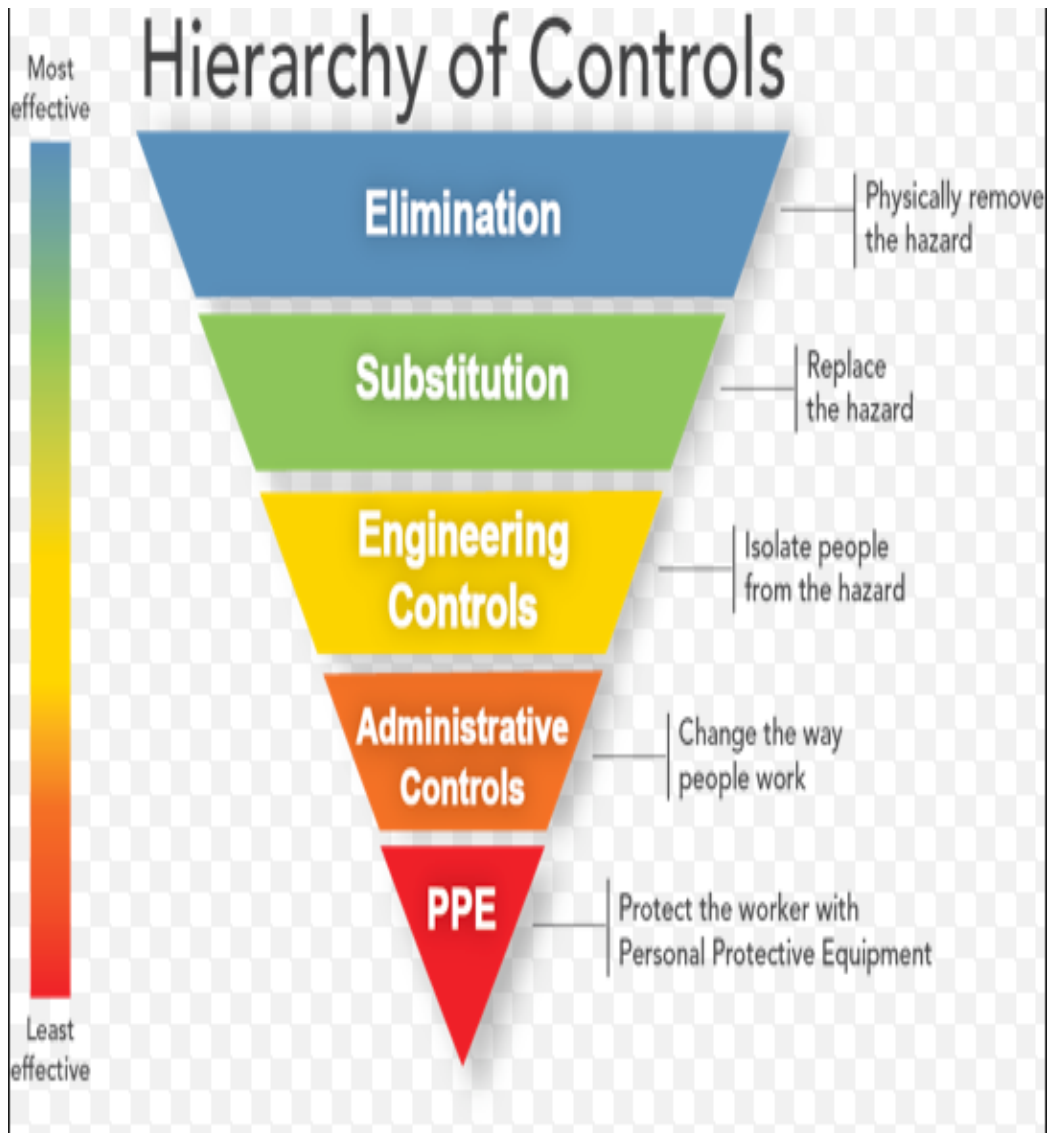
4.4 ADMINISTRATIVE

Administrative controls change the way work is done. Examples of administrative controls include:

- Working at night to minimize the potential for heat stroke during hot summer weather,
- Assigning a worker to other duties to minimize dust exposure,
- Providing safe work practices and training to workers before assigning new duties,
- Worker education and training in the appropriate work procedures and practices, and
- Access to competent supervision.

4.5 PERSONAL PROTECTIVE EQUIPMENT (PPE)

All workers must wear Personal Protective Equipment (PPE) as per site requirements and conditions.



5. HAZARD and RISK CONTROL MEASURES

The following list contains laws, standards, guidelines, and codes that provide information and guidance in the development and implementation of effective controls:

- Workers Compensation Act
- Occupational Health and Safety Regulations
- Fire and Building Codes
- Ministry of Labour Standards and Guidelines
- Canadian Standards Association
- Workplace Policies and Procedures
- Manufacturers and Suppliers Instructions

ELEMENT 3:

SAFE WORKING

PROCEDURES

(SWP)

RESOURCES

Legal Ref.

OHSR 115 General Duties of Employers

Forms

FLHA Form

Safe Working Procedures

SWP019 General Rules Construction

1 DEFINITION

A safe working procedure (SWP) is an administrative control used as a guideline on how specific tasks should be performed. SWP's are the general do's and don'ts of common work activities such as using power tools or ladders and to provide general instruction for workers to perform work duties safely. A hazard assessment must be completed to determine specific requirements for the development of SWP's.

2. RESPONSIBILITIES

2.1 ARKAY MANAGEMENT TEAM

Arkay management develops suitable SWP's based on the work to be undertaken by Arkay workers. Arkay workers are to follow site produced SWP's. In the absence of an established SWP, Arkay management will:

- Develop responsible SWP's to protect from work-related hazards,
- Involve the workers in the development and/or review of SWP's,
- Ensure SWP's have been written, are readily available, and are easy to understand,
- Provide the necessary information, instruction, or training to workers to support them to work without risk to their health or welfare,
- Conduct inspections to ensure SWP's are being followed, and
- Take the appropriate action when SWP's are not followed.

2.2 ARKAY WORKERS

- Understand the SWP's or ask the site supervisor for clarification.
- Inventory tools and provide a list so Arkay management can review what SWP's are required.
- Participate in the development and/or review of SWP's.
- Report any issues with the SWP to the site supervisor.

3. OBSERVING, REVIEWING and REVISING SWP'S

SWP's are considered as critical tasks as outlined in Element 2: Workplace Hazard Identification and Control (page 15, 4.4). All safety critical SWP's are to be reviewed as needed or if an incident occurs while a worker is performing the task. If an SWP is required to be altered, affected Arkay workers will be re-trained with the retraining recorded and documented. The observation of the critical SWP must be recorded.

ELEMENT 4:

SAFE JOB

PROCEDURES

(SJP)

RESOURCES

Legal Ref.

WCA	118/119	
OHSR	G9.9-1	Hazard Assessment

Forms

FLHA

Toolbox Talk

TG06-30 Health and Safety Responsibilities

1 DEFINITION

SJP's are an administrative control measure to reduce the risk of damage or injury to people and property. A written specific step-by-step description on how to complete a job, both safely and efficiently, from start to finish, e.g., lockout, confined space, hoisting, rigging. SJP's must clearly identify the hazards the worker may be exposed to, the necessary steps required to complete the task (in proper order), and the control measures (also referred to as SWP's).

2. RESPONSIBILITIES

2.1 ARKAY MANAGEMENT TEAM

- Ensure SJP's have been written for the work to be performed and are readily available.
- Involve the workers in the development and review of SJP's.
- Support the education and training of the workforce in SJP's.
- Take the appropriate action when the SJP's are not followed.

2.2 ARKAY WORKERS

- Know what an SJP is and why it is important as part of the Arkay OSH program.
- Know how to access and follow the SJP's.
- Understand SJP's or ask a supervisor for clarification.
- Participate in the development and/or review of SJP's.
- Report any issues with the SJP's to the line manager or functional lead.

3. DEVELOPING SJP'S

SJP's are to be developed for a new job or task, when changing the design of a job or task, and when introducing new equipment and/or material. The development of SJP's is a collaborative process to ensure individual job steps are not overlooked and potential hazards are reduced. It also contributes to identifying the most appropriate measures for eliminating or controlling hazards. Effective teams include site-based functional leads and supervisors, Arkay management and experienced workers.

- **Step 1:** Identify SJP's.
- **Step 2:** Break the job into steps and identify the hazards and controls.
- **Step 3:** Observe the task being conducted and evaluate it against the SJP's.
- **Step 4:** Revise the SJP's when necessary.
- **Step 5:** Review with Arkay and site management.

4. WHEN TO USE SJP'S

SJP's are discussed, reviewed, and implemented during:

- Worker and site-specific orientations
- Task specific training
- Safety talks
- Regular operations
- Investigations, inspections, and audits

ELEMENT 5:

COMPANY RULES

RESOURCES

Legal Ref.

WCA 115 / 117
OHSR

Forms

FLHA

Safe Working Procedures

SWP 011 Discipline for OHS Infractions
SWP 019 General Construction Rules

1 RESPONSIBILITIES

Arkay workers on prime contractor sites are to follow site safety requirements. Arkay has developed its own safety rules which workers are required to follow. These rules are general in nature. Specifics can be identified in the field level hazard assessment (FLHA.) An FLHA can be found in the rear pocket of the Arkay OSHA manual.

1.1 ARKAY MANAGEMENT TEAM

- Make resources available for the communication, education, and training of Arkay company rules.
- Provide a safe working environment for its workers in coordination with site management.
- Incorporate Arkay and site rules into meetings and discussions.
- Take corrective steps to address issues of non-compliance.
- Support clients when violations or non-compliance is evident.
- Engage workers in developing and understanding the need for rules and the consequences of non-compliance.
- Conduct regular inspections to ensure safety rules are being followed.
- Administer the use of established safety rules.

1.2 ARKAY WORKERS

- Understand and follow safety rules or ask the CSO for clarification.
- Report any issues regarding safety rules to the site supervisor.
- Participate in toolbox talks and site-specific safety training.
- Notify Arkay management of any safety violations.

2. ARKAY COMPANY RULES

- 1 All workers must complete the Arkay company orientation.
- 2 New or young workers require an additional orientation.
- 3 Workers must complete the prime contractor's site-specific orientation.
- 4 PPE must always be worn on-site prior to occupancy permit as per WorkSafeBC legislation.
- 5 Suitable gloves must be worn when handling materials with sharp, rough, or abrasive surfaces or containing chemicals.
- 6 Suitable protective eyewear must be worn for all operations where the eyes or face are exposed to projectiles, light flashes, chemical or intensive heat.
- 7 Zero tolerance for alcohol, drugs and any type of abuse and violence on the worksite.
- 8 All workers operating equipment must carry valid certification.
- 9 No roughhousing, loud music, or the use of ear buds in both ears.
- 10 All safety hazards must be reported to site management immediately.
- 11 All injuries are to be assessed by the first aid attendant.
- 12 All first aid and incident reports must be completed, Arkay management notified, and copies of the first aid and incident reports sent to Arkay management within 48 hours.
- 13 Fall protection equipment must be worn when working above 3m /10ft or when there is a significant hazard and workers must hold a valid fall protection certification.
- 14 Never lean against a guardrail.
- 15 Keep work area unobstructed and tidy.
- 16 Hoses, cables, ropes, and wires must be stored when not in use to prevent trip hazards.

- 17 Hazardous materials must be stored and handled according to WHMIS - do not rely on hand-written or 3rd party labels and refer to the safety data sheet. The prime contractor will have safety data sheets for their materials as well as safety data sheets from their subtrades. Any questions or concerns shall be directed to the CSO on site or the Arkay Health and Safety Coordinator and, if necessary, to Arkay management.
- 18 Combustible/flammable materials are to be stored and used in accordance with site rules.
- 19 No personal phone usage in active work areas.
- 20 Look for monthly updates on Arkay's website's "Teachable Moments," email blasts and bi-monthly hard-copy hand-outs.
- 21 Workers must use a respirator with valid fit-test while completing exposure tasks.
- 22 Arkay workers must abide by Arkay Silica Exposure Guidelines while completing silica exposure tasks (*refer to the Policy section*).

3. ZERO TOLERANCE RULES

The following may lead to written warning, suspension, or dismissal:

- Fall Protection – 100% tie off over 10ft / 3m or when determined by the prime contractor or Arkay management,
- Lock Out/Tag Out (LOTO) all energized equipment,
- Limits of Approach,
- Confined Space Entry without a suitable risk assessment and Permit to Work,
- Drug and Alcohol Abuse,
- Behaviours (Bullying, Violence, Harassment, Insubordination),
- Any act that may be considered malicious or negligent,
- Any act that may lead to serious risk of injury or damage to equipment,
- Non-Compliance, and
- Theft or dishonesty.

4. INFRACTIONS and NON-COMPLIANCE CRITERIA

Minor Infraction	Infraction of Arkay or client rules that do not have the potential to cause immediate serious damage or injury but break one of the requirements of the OHS requirements
Strike 1	Verbal warning (to be noted by CSO/Superintendent)
Strike 2	Verbal warning and letter to personnel file
Strike 3	Removal from the worksite for at least 1 day, or dismissal of worker

Major Infraction	Any infraction of WorkSafeBC legislation, Arkay or client rules that have or could have resulted in serious violations, injury, death or property damage from negligent acts, omissions, or behaviour
Strike 1	Time off without pay and review of company rules, or dismissal of worker
Strike 2	Dismissal of worker

The above list is not intended to be complete or exhaustive and other rules and regulations which apply will be clarified based on the location of where you will be visiting or working.

ELEMENT 6:

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Canadian Standards Association (CSA)

RESOURCES

Legal Ref.

WorkSafeBC Part 8

Toolbox Talks

TBT012	Hearing protection
TBT016	Inspecting body harnesses
TBT018	When to use a full body harness
TBT055	Respirator Seal
TBT056	Putting on your Respirator
TBT066	Hearing protection for residential construction
TBT067	Proper use of foam earplugs
TBT068	Noise – how loud is it
TBT080	Eye and face protection

1 RESPONSIBILITIES

1.1 ARKAY MANAGEMENT TEAM

- Make available resources for information, instruction, training, and necessary education on the safe use of PPE.
- Ensure the PPE program is readily available to workers.
- Maintain control to provide a proper work environment and that follow-up procedures are in place to ensure workers comply with the PPE program.
- Incorporate the company PPE program into meetings and discussions.
- Review the hierarchy of controls.
- Ensure a system is in place to inspect and maintain PPE and ensure workers understand the consequences of non-compliance.

1.2 ARKAY HEALTH and SAFETY COORDINATOR

- Promote and educate on company PPE program.
- Assist workers in understanding the need for PPE and the consequences when established PPE requirements are not followed.
- Provide instruction to workers in the use, care, and maintenance of PPE.
- Conduct regular inspections of PPE.
- Educate on the proper use of PPE.
- Document non-compliance of PPE.

1.3 ARKAY WORKERS

- During the orientation, the worker will be advised of what PPE s/he must provide.
- Follow PPE requirements.
- Communicate and/or question any concerns of PPE use with the CSO.
- Inspect PPE daily and before each use.
- Maintain PPE in good condition and store it correctly as per manufacturer's instructions.

2. MAINTENANCE and STORAGE

- Inspect PPE before and after each use.
- Immediately take damaged equipment out-of-service.
- Dry equipment away from heat, steam, and direct sunshine.
- Store PPE in dry air, free from exposure to sunlight or contaminants.

3. FITTING and TRAINING

- Safety training and education includes individual fitting of PPE by a certified professional.
- Use PPE as intended and described by the manufacturer.
- Ensure Respiratory Protective Equipment (RPE) is only used where the worker has been face-fit-tested by a certified professional.
- All workers are required to undertake PPE training and understand the requirements for:

- Suitability for the job/task,
- Understand its capabilities and limitations,
- Correctly wear and adjust,
- Follow the correct care, maintenance, lifespan and disposal of the device or item,
- Workers are to review Arkay Silica Exposure Control Guidelines (*refer to the Policy section*),
- Document training (*refer to Element 8*).

4. TYPES of PPE and REQUIREMENTS

4.1 EYE and FACE PROTECTION

- Face and eye protection shall be kept clean and in good repair.
- If a worker cannot wear safety glasses as documented by a physician's note, alternate arrangements must be made to verify the individual's face and eyes are protected.
- All components of prescription glasses that are being used for eye protection must meet approved and applicable regulatory standards.
- The prescription glasses will include CSA approved side-shields.
- Coverall glasses or goggles are required for prescription glasses that do not meet CSA standard.
- Face shields are required when grinding/cutting steel, concrete, or chemical use, and must be worn with safety glasses underneath.
- When working overhead, goggles or other safety glasses are required.

4.2 HEAD PROTECTION

- Workers shall wear hard hats that are in good condition and meet WorkSafeBC requirements and standards.
- Alteration of hard hats is prohibited.
- Hard hats shall be worn in the manner prescribed by the manufacturer.
- Only head apparel designed to be worn under a hard hat is allowed.

4.3 FOOT PROTECTION

- All workers must wear CSA approved, green tagged, ankle length minimum, safety footwear and the safety footwear must be in good repair.
- It is the worker's responsibility to ensure footwear meets PPE requirements.
- Non-safety footwear is not permitted in construction areas but may be approved at the discretion of site management within completed units.

4.4 HAND PROTECTION

All workers must use appropriate CSA approved hand protection when exposed to hazards such as:

- Skin absorption of harmful substances
- Severe cuts or lacerations
- Severe abrasions
- Punctures
- Chemical and thermal burns

4.5 HEARING PROTECTION

As per WorkSafeBC, hearing testing is required to be conducted within six months of hiring and annually thereafter. Arkay management is responsible for ensuring workers have their hearing tested at least once a year. Arkay workers are to provide a screen shot of the WorkSafeBC approved card. Site areas that may require hearing protection will be identified during the site orientation and the FLHA's, and proper hearing protection will be provided.

Workers should not be exposed to noise over the occupational exposure limits (OEL):

- 85dBA L_{ex} daily noise exposure level
- 140dBC peak sound level

Sound mitigation solutions may include introducing engineering controls, work practices/ administrative control, and/or providing personal hearing protection.

Recognized hearing protection available to effectively reduce noise exposure are:

- Over earmuffs*
- Ear insert earplugs*

*Earplugs are an acceptable hearing protection, whereas cotton plugs are not acceptable and are not to be used. Do not share earmuffs used for hearing protection. In some conditions, especially when using loud impact tools in an enclosed space, the selection of hearing protection is critical. Workers may use both insert plugs and over earmuffs or custom molded plugs.

4.6 RESPIRATORY PROTECTION

Arkay management will provide appropriate CSA respiratory protective equipment to prevent workers from being exposed to concentrations of an air contaminant over an applicable exposure limit (such as silica dust) or to an oxygen-deficient atmosphere (confined space). Arkay follows the guidelines set forth through WorkSafeBC regarding care and use of respirators based on CSA Z.94.4-11. The Arkay Health and Safety Coordinator or CSO for the prime contractor will arrange for the proper respirator and face-fitting by a certified professional.

4.7 FALL PROTECTION (FP)

FP will be provided by the site and/or Arkay management when there is a risk of falling 3m (10ft) or more, or if there is hazard below. FP must also be used if a fall from a lower height could cause a serious injury. Types of FP equipment include:

- Fall arrest and restraint
- Safety belts
- Lanyard and anchors
- Harnesses
- Lifelines and barricades
- Type E Extraction Harnesses

ELEMENT 7:

PLANNED and PREVENTATIVE MAINTENANCE (PPM)

RESOURCES

Forms

FLHA Form

Safe Working Procedures

SWP019 General Rules Construction

1 **RESPONSIBILITIES**

1.1 **ARKAY MANAGEMENT TEAM**

- Allocate adequate resources for the development of a PPM based on equipment used on-site by Arkay workers.
- Incorporate the company PPM program into meetings and discussions, e.g., toolbox talks.
- Ensure PPM program has been written and is readily available to workers.
- Promote and educate on the Arkay PPM program.
- Provide information, instruction, and training to workers in the use, care and maintenance of equipment and tools.

1.2 **ARKAY WORKERS**

- Every Arkay worker is responsible for wearing the PPE required for his/her work as requested by the prime contractor - no exceptions.
- Understand and follow the PPM requirements or ask Arkay management for clarification.
- Perform inspection at the start of every workday and visual checks before each use.
- Undertake any training required to operate equipment safely.
- All Arkay workers will complete a PPE checklist during the Arkay orientation (*refer to Element 5, page 22, 2(4), and Element 6, page 26, 12.2*).
- Follow all maintenance procedures as per manufacturer's instructions.
- Report any concerns regarding PPM to Arkay management.
- Maintain equipment and tools and store correctly.
- Where applicable, the Logbook is to be daily maintained.
- Maintaining the Logbook is the responsibility of the operator/user.
- Ensure any safety labels or instructions are always kept visible.
- Workers must not use any vehicle they have not been trained on or have proper licensing for.

2. **IMPLEMENTATION**

A planned and preventative maintenance program (PPM) or a preventative maintenance program is designed to ensure any tools or equipment are maintained in optimum condition and to undertake servicing and repairs before faults develop at a predetermined time/duration.

PPE Item	Worker Initial	Date
SA approved hard hat		
Safety hi-visibility vest		
Safety glasses e.g., UVEX A700 Series SA ansi z87+		
Gloves* e.g., Hazmaster general purpose		
Green triangle safety footwear		
Ear protection* e.g., Laser Lite multi-colour foam ear plugs (noise reduction rating 32 decibels)		
Respirator*		

* Gloves: General working gloves are the workers responsibility. The prime contractor may require specific gloves as a site condition. The prime contractor or Arkay will provide.

* Ear Protection: Specific ear protection may be required, to be provided by Arkay. For general conditions, multi-colour foam ear plugs will be available at the site first aid office.

* Silicone half-mask respirators will be supplied by Arkay. A worker may not buy or use a mask without providing face-fit-test documentation by a certified professional. Arkay requires that all Arkay workers be face-fit-tested with the mask to be used. No Exceptions.

Arkay will provide the half-mask and arrange for the face-fit-test.

3. DEFECTIVE EQUIPMENT/TOOL RETURN PROCESS

- Bring defective equipment to the site CSO for visual inspection and advice.
- Tag the defective equipment and provide an explanation.

ELEMENT 8:

TRAINING and COMMUNICATION

RESOURCES

Legal Ref..

WCA 115 / 117
HSR G4.51 /G4.16

Toolbox Talk

TBT06-30 Health and Safety Responsibilities

1 RESPONSIBILITIES

1.1 ARKAY MANAGEMENT TEAM

- Allocate resources for the communication and education of the training and communication program to ensure it is readily available to Arkay workers.
- Incorporate the training and communication program into meetings and discussions.
- Involve workers in the development and review of the training and communication program.
- Assist workers in understanding the need for training and communication and the consequences when requirements are not followed.
- Manage the training and communication program.
- Provide skills-based training.
- Provide document training.

1.2 ARKAY WORKERS

- Understand safety training and communication requirements or ask the CSO for advice.
- Identify to Arkay management where areas of training are needed.
- Report any issues regarding training and communication to site supervisor and/or Arkay management.
- Do not conduct work that you have not been trained to do or are unable to do.

2. TRAINING

2.1 SITE SAFETY ORIENTATION

Every worker will receive a site safety orientation prior to his/her first day of work. This training will review company rules, workplace hazards, safe job procedures, safe work practices, reporting procedures, rights, responsibilities and more. Workers under the age of 25 or new to the construction sector with less than 6 months experience are required to complete a New and Young Workers' Orientation.

2.2 FALL PROTECTION

Workers working above 10'3m or working above hazards are required to have fall protection training at least every 2 years from a recognized training organization or from Arkay Coordinator when re-certifying.

2.3 MOBILE EQUIPMENT

All Arkay workers operating mobile equipment are required to keep certification valid and be trained by a recognized training organization.

2.4 CONFINED SPACE

Arkay workers require a valid Confined Space certificate when working in confined spaces. Arkay's Health and Safety Coordinator will meet with the worker, review the site working conditions, complete an FLHA for each day, and confirm with the prime contractor the schedule for work.

2.5 RESPIRATORY PROTECTION

- Arkay workers are required to use an adequate respirator with a valid fit-test certification when exposed to silica, RCS dust, or organic vapour.
- Workers are required to review and understand the Arkay Silica Exposure Control Guidelines (*refer to the Policy section*).

2.6 SKILLS BASED TRAINING

- Right Tool Right Job
- Limits of Approach
- Lock Out / Tag Out (LOTO)

3. COMMUNICATION

3.1 TOOLBOX TALKS

Weekly toolbox talks are an essential safety meeting for workers and are focused on the specific site conditions and hazards, at the time, and to assist workers on how to deal with them.

3.2 TEACHABLE MOMENTS

Every 6-8 weeks a new Teachable Moment is posted on Arkay's website for full Arkay worker participation. These Teachable Moments usually have 8-10 questions focusing on safe work production and procedures, communication, teamwork, etc., as well as specific topics such as silica, cannabis, ladder safety, etc. Teachable Moments (1) help ensure messages are being received and understood, (2) assist Arkay management in knowing where more focus needs to be, and (3) facilitate feedback from its workers.

3.3 HANDOUTS

Every 6-8 weeks handouts are delivered to each Arkay worker. These handouts contain the follow-up to the previous Teachable Moment, a blurb on the upcoming Teachable Moment, and any relevant and topical information.

3.4 INVESTIGATIONS and INSPECTIONS

- Investigation findings must be communicated to Arkay workers. Investigations will be posted on the safety board for review. *Refer to Element 9: Workplace Inspections (page 38), and Element 10: Investigation and Reporting pages 41-42).*

Inspection findings must be communicated to Arkay workers. Investigations will be posted on the safety board for review. *Refer to Element 9: Workplace Inspections (page 38).*

3.5 JOINT OCCUPATIONAL HEALTH and SAFETY COMMITTEE (JOHSC)

Arkay currently does not have the structure to establish a company JOHSC.

ELEMENT 9:

WORKPLACE INSPECTIONS

RESOURCES

Legal Ref.
OHSR

Forms
FLHA Form
Inspection Form
Jobsite Inspection Checklist

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1 RESPONSIBILITIES

1.1 ARKAY MANAGEMENT TEAM

- Allocate resources for the communication and education on workplace inspections.
- Ensure workers comply with workplace inspections, site toolbox talks and site meetings.
- Ensure workers have been trained to inspect their work areas including tools and equipment.
- Ensure workplace safety through site visits.
- Allocate duties to functional leads.
- Take corrective steps for non-compliance.

1.2 ARKAY WORKERS

- Participate and cooperate with the safety inspection requirements.
- Share ideas or concerns on work site conditions.
- Report any issues regarding inspections to the site supervisor; for more serious issues, include Arkay management.

2. INSPECTIONS

- Workers, functional leads, CSO's and site management are expected to conduct ongoing inspections throughout the working day to watch for unsafe acts and conditions (see Daily Worksite Inspections Scope below).
- A worker and supervisor can correct a problem by discussing the act or condition before an incident occurs.
- Situations that require additional corrective actions must be recorded for follow-up.
- Avenues to identify and assess a potential hazard or event are through toolbox talks, email updates, Teachable Moments, safety reminders and peer communication.

2.1 DAILY WORKSITE INSPECTION DOCUMENTATION SCOPE

- Controls and control zones are in place and effective.
- Housekeeping is in order with no clutter or poorly arranged work areas.
- Correct storage of materials.
- Tools and equipment are inspected daily and before each use.
- Items that are in excess, obsolete, or are no longer needed are disposed of correctly.
- Tools and equipment are not left in work areas – items are returned to a suitable tool lock-up or storage area.
- Adequate first aid equipment is available, suitably stocked and maintained on-site.
- Workers certificates and training are up to-date.
- Fall protection programs are developed and in use by workers.
- Workers are wearing all PPE and maintained correctly.
- Fire escape routes and walkways, doorways, paths and accesses and egresses are clean, unobstructed and hazard free.

2.2 SPECIAL INSPECTIONS

Following an incident, special inspections refer to the review process of 2.1 (above) to determine if additional daily inspections are required.

ELEMENT 10:

INVESTIGATING and REPORTING

RESOURCES

Legal Ref.
OHSR

Form
Arkay Incident Report Form

1. RESPONSIBILITIES

To provide a standardized method for undertaking accident and incident investigations. Arkay has defined steps to establish root cause to prevent further loss, injury or damage resulting from incidents.

1.1 ARKAY MANAGEMENT TEAM

- Investigate all incidents that occur in Arkay's area of responsibility.
- Ensure Arkay workers receive training in the reporting of incidents and near-misses.
- Arrange for written statements from witnesses and any worker involved.
- Train workers who may be involved in conducting incident investigations.
- Allocate resources to implement approved corrective and preventative actions.
- Take corrective steps, including preventative/corrective actions.
- Maintain awareness of incidents that have occurred, and the corrective actions taken.
- Arkay's Health and Safety Coordinator will participate in day-to-day investigations and report to Arkay management.

1.2 ARKAY WORKERS

- See Arkay Reporting Accidents Posters on Site Safety Boards.
- Do not disturb the incident scene.
- Report all incidents, accidents, or near-misses to the CSO or OFA and Arkay management.
- Take steps to prevent further loss, injury or damage resulting from an incident if safe to do so.
- Participate in the investigations of incidents using fact-based and self-observed evidence.
- Be part of the solution.
- Provide peer support if a fellow worker is injured.

2. INCIDENT REPORTING

Description of what needs to be reported:

- Detail of what happened,
- What was being done at the time it happened.
- The date and time it happened,
- The name of the injured and/or damage that occurred,
- The type of injury and/or damage that occurred, and
- Names of witnesses.

What types of incidents need to be reported to Arkay?

- All incidents resulting in death,
- All incidents resulting in an injury requiring medical treatment,
- Any near-miss, incident, or accident,
- All causes of occupational illness or disease,
- All incidents which involve property damage,
- All near-miss incidents that have the potential to cause serious injury or property damage, and
- Any major release of toxic substance.

Why the need to report?

- To find out what happened to prevent it from happening again, and
- To maintain compliance with the Occupational Health and Safety regulations.

3. **INVESTIGATION**

- The investigative team shall include an Arkay management team member, a site management team member, and a worker representative who is familiar with the work being investigated.
- The Arkay Incident Report Form shall be used for the investigation. It can be downloaded from the Arkay website or requested from Arkay management.
- A review of available information relating to the incident such as safe work procedures, drawings or other information shall be assembled.
- A review of workers training records and previous related incidents, or injuries shall be made.
- All reports shall be sent to Arkay office within 24 hours of report completion.

3.1 **THE THREE STAGES of INVESTIGATION**

STAGE 1	STAGE 2	STAGE 3
Where practical, the scene of a serious incident is required to be reported to WorkSafeBC and must be left undisturbed until permission to clear the scene has been granted by the WorkSafeBC officer. Exceptions include activities for rescue work or prevention of further damage or injury when photographs and sketches of the incident scene should be undertaken.	Stage 2 involves the immediate factors that occurred during the incident (task, specific activity, posture, location), materials and equipment directly involved (type, brand, size, guarding, condition), actions and movements that led to the incident (fall, trip, slip) and environmental characteristics (weather, lighting, noise, temperature, vapors, ventilation).	This stage includes factors that occurred during the actual incident that minimized or increased the seriousness which may include the response time of emergency personnel, first aid available on-site, location and condition of emergency equipment, emergency plans, PPE worn or unused.

4. **INVESTIGATION PROCESS**

4.1 **ENSURE NO DANGER**

Stop, Look and Listen

4.2 **ENSURE INJURIES are CARED FOR**

Care for the injured takes priority, ABCD:

A (Airway) B (Breathing) C (Circulation) D (Deadly Bleeding)

4.3 **PRESERVE the SCENE**

Preserving the incident scene by leaving things undisturbed, photographing and documenting is important for investigators. For serious incidents, the scene shall be preserved for investigation by WorkSafeBC.

4.4 **GATHER INFORMATION at the SCENE**

- Date, time, location, conditions at time of incident,
- Name of persons involved, injured, bystanders, persons rendering aid,
- Measurements, drawings, and/or photos of the scene,
- Descriptions and conditions of equipment, machinery and/or tools involved, and
- Any other information that the investigator feels is relative.

4.5 **INTERVIEW WITNESSES and the INJURED**

Conduct interviews after the incident as soon as possible and interview witnesses individually. Gather all the facts to find the cause and prevent a reoccurrence.

4.6 EXPLORE the CAUSE

- **Substandard Acts and Conditions**

The “immediate or direct causes” of accidents or incidents are the circumstances that immediately precede the contact. They usually can be seen or sensed and can be called “unsafe acts” (behaviours which could permit the occurrence of an accident) and “unsafe conditions.”

- **Personal Factors and Job Conditions**

The “basic or underlying causes” are the diseases or real causes behind the symptoms. The substandard acts and conditions occurred and the factors that, when identified, permit meaningful management control.

To determine the appropriate cause, consider all details of the investigation. Include, where possible, the workers statement and whether the incident was due to an act of the worker, a condition of the individual’s working environment, or a personal factor inherent in the worker at the time of the incident or the onset of illness.

4.7 NOTE the CONTRIBUTING FACTORS

Contributing factors are events, conditions, equipment, practices, etc., that increase the likelihood of the incident occurring. Other factors include what might have increased (or could have decreased) the severity of the injuries.

4.8 WRITE the REPORT and MAKE RECOMMENDATIONS

Include as much information as possible and try to make recommendations that will prevent this incident from occurring again. For each contributing factor there must be a suitable corrective recommendation. For each recommendation there must be a person responsible for implementation, and completion by an assigned date.

5. FOLLOW UP

Copies of the incident investigation report shall be retained by site and Arkay management. As soon as practical, Arkay and/or the prime contractor shall institute corrective action and bring it to the attention of all workers who are, or can be, affected. Incident investigation reports and applicable recommendations shall be utilized as diagnostic topics for safety & health meetings and presentations. Arkay will use the findings to determine if the recommendations have been acted upon in an appropriate manner.

6. TRAINING

Arkay management mandates training for those who are conducting investigations.

ELEMENT 11:

EMERGENCY PREPAREDNESS

RESOURCES

Legal Ref.

OHSR G4.13

Emergency Preparedness and Response

Form

Potential Threats Incident Form

1. **RESPONSIBILITIES**

1.1 **ARKAY MANAGEMENT TEAM**

- Ensure workplace hazards are identified through hazard assessments of planned jobs/tasks.
- Ensure proper equipment is available for each worker in case of emergency.
- Allocate resources, materials, and equipment.
- Request and review the site EPP and provides input as part of due diligence.
- Contact the next of kin of an injured Arkay worker.
- Develop site specific EPP's when necessary.

1.2 **ARKAY WORKERS**

- Participate in pre-work site orientation and site-based toolbox talks which includes the site EPP.
- Review above bullet following a lengthy absence.

2. **MEDICAL EMERGENCIES**

- Stay as calm as possible.
- Implement the site EPP.
- Follow site orientation safety procedures.
- Communicate with CSO and OFA.

3. **POWERLINE CONTACT (ABOVE and BELOW GROUND)**

Any Arkay worker in proximity of any electrical hazards above or below ground is required to go to the CSO for advice. Additional information available online at:

BC Hydro: <https://www.bchydro.com/safety-outages/electrical-safety/safe-distance.html>

4. **GAS LINE CONTACT (BELOW GROUND)**

Any Arkay worker in proximity of underground gas line contact is required to go to the CSO for advice. Additional information is available by phone at: **BC onecall**

5. **FIRE**

Any Arkay worker in proximity to a fire should take-action specific to the site's EPP.

- Do Not Panic.
- Activate local fire arrangements.
- Leave through the nearest fire escape or egress.
- Alert others as you egress.
- Gather at site-agreed assembly point.
- Follow fire warden/marshal's instructions.

6. **INTERNAL and EXTERNAL THREATS of VIOLENCE**

In the event of an internal or external threat, document through the Potential Threats Incident Form ¹ and refer to *Element 16: Prevention of Violence in the Workplace (pages 60-61)*. Report anything suspicious to site management.

¹ See Appendix 4

ELEMENT 12:

RECORDS and STATISTICS

RESOURCES

Legal Ref.
OHSR

Form
FLHA Form

1. **RESPONSIBILITIES**

1.1 **ARKAY MANAGEMENT TEAM**

- Conduct data analysis of accident, incident, near-miss records.
- Use this information in the Health and Safety Management System to assist in the identification of trends and measures to be undertaken to improve incident prevention.
- Establish suitable measures to maintain and communicate records.
- Set OHS targets and goals for the company based on statistical analysis.
- Maintain control, responsibility, and accountability for ensuring Arkay's OHS records and documentation are accurate and appropriate.
- Review monthly reports provided by the Injury Management Team (DMI, Disability Management Institute).
- Provide basic skills training to workers on their OHS responsibilities and duties.

1.2 **ARKAY WORKERS**

All workers are to follow safety rules and participate in the following documented procedures.

2. **RECORDS**

Certain records are to be retained for a predetermined period.

Length of Employment = LOE Length of Organization = LOO

Length of Use = LOU Best Practice = BP

ELEMENT 1 POLICY			
Record	Retention	Regulation	Comments
Policy Statement Review	LOE/LOO	Guidelines OHSR	Signed and revised annually and brought to the attention of all workers. Permanent file.

ELEMENT 2 HAZARD ASSESSMENT			
Record	Retention	Regulation	Comments
Organizational Risk Assessment and Risk Registry	LOO		Reviewed annually by management team.
FLHA	3 years	OHSR 8.4	Reviewed by Health & Safety Coordinator and procedural changes introduced if necessary. Retained for 3 years along with contractor documentation following project completion.
Task-Specific Risk Assessments	3 years		Retained for 3 years including contractor documentation following task completion.
Asbestos Risk Assessments	10 years	OHSR 6.32	Includes contractor documents.

ELEMENT 3 SAFE WORK PRACTICES			
Record	Retention	Regulation	Comments
Safe Work Practices (SWP)	LOO	OHSR 3.3(c)	All workers to be instructed on tasks; SWP form part of process.
Safe Work Practice Review (SWP)	LOO	Guidelines OHSR	Reviewed annually by management team.

ELEMENT 4 SAFE JOB PROCEDURE			
Record	Retention	Regulation	Comments
Safe Job Procedure (SJP)	LOO	OHSR 3.3(c)	All workers to be instructed on tasks; SJP form part of process. Demonstrates employer has analyzed workplace tasks and are broken down into steps.
Safe Work Practice Review (SWP)	LOO	Guidelines OHSR	Reviewed annually by management team.

ELEMENT 5 COMPANY RULES			
Record	Retention	Regulation	Comments
Non-Compliance Orders	LOE	OHSR 3.3(f)	Issued by WorkSafeBC.

ELEMENT 6 PERSONAL PROTECTIVE EQUIPMENT			
Record	Retention	Regulation	Comments
Training	3 years	Guidelines OHSR	Kept in Arkay data base.
Inspections	BP	Prevention Manual Policy D12-196-1 & D12-196-3	Kept in Arkay data base.
Maintenance	LOU	OHSR 8.3(b) Prevention Manual Policy D12-196-1 & D12-196-3	While the regulations do not stipulate to keep records, due diligence demonstrates good practice.

ELEMENT 7 PREVENTATIVE MAINTENANCE			
Record	Retention	Regulation	Comments
Movable Work Platform	LOE	OHSR 13.72 & 4.9	Reasonably available for operators and maintenance personnel.
Machines and Equipment	LOU	OHSR 4.9	Refers to specific machinery noted in other parts of the regulation that require inspection and maintenance records. Reasonably available for operators and maintenance personnel.
Facilities	LOE		
Mobile Equipment	LOE	OHSR 16.3 & 4.9	Reasonably available for operators and maintenance personnel.

ELEMENT 8 TRAINING & COMMUNICATION			
Record	Retention	Regulation	Comments
Orientations	3 years	Kept in Arkay data base.	Kept in Arkay data base.
Training	3 years	Guidelines – OHSR.	Kept in Arkay data base.
Safety Meetings	LOO	OHSR 3.3(f)	Kept in Arkay data base.

ELEMENT 9 INSPECTIONS

Record	Retention	Regulation	Comments
Worksites	LOO	OHSR 3.3(f)	For SWP development.
Equipment	LOO	OHSR 3.3(f)	Planning
PPE	LOO	OHSR 3.3(f)	Kept in Arkay data base.

ELEMENT 10 INVESTIGATIONS

Record	Retention	Regulation	Comments
Investigations	LOO	OHSR 3.3(f)	Safety. Legal.

ELEMENT 11 EMERGENCY PREPAREDNESS PLANS

Record	Retention	Regulation	Comments
Worksite EPP	3 years	OHSR 3.3(f)	As per site conditions.
Office	LOO		Seasonal review.

ELEMENT 14 JOHS COMMITTEE

Record	Retention	Regulation	Comments
Meeting Minutes	LOO	OHSR 3.3(f)	Under review.
JOHSC Training	3 years		Under review.

ELEMENT 15 OCCUPATIONAL HEALTH

Record	Retention	Regulation	Comments
Hearing Test	LOE	OHSR 7.9	Records to be maintained and risk registry populated.

ELEMENT 16 FIRST AID

Record	Retention	Regulation	Comments
First Aid	3 years	OHSR 3.19	Training. Education. Planning. Legal.

ELEMENMT 17 INJURY MANAGEMENT

Record	Retention	Regulation	Comments
DMI Reports	Varies	WorkSafeBC	Strategic Analysis. Legal.

Records Retention is a tool that applies to all elements of the Arkay OSH manual.

ELEMENT 13:

LEGISLATION

RESOURCES

Form

Due Diligence Checklist

Toolbox Talks

Health and Safety Responsibilities

Right to Refuse

1. **RESPONSIBILITIES**

1.1 **ARKAY MANAGEMENT TEAM**

The management team is responsible for providing compliance and due diligence with health, safety and welfare legislation following federal, provincial, and municipal law and WorkSafeBC guidelines on all sites with Arkay workers.

- Demonstrate a commitment in the compliance of WorkSafeBC and health and safety requirements.
- Incorporate WorkSafeBC and health and safety requirements into meetings, discussions, and work methods.
- Ensure copies of relevant WorkSafeBC and health and safety requirements are available to workers.
- Remind workers of their WorkSafeBC rights and responsibilities.
- Stay abreast of regulatory reporting requirements.
- Report non-compliance to Arkay management.

1.2 **ARKAY WORKERS**

Workers have a responsibility to comply with WorkSafeBC and health and safety requirements and to perform assigned duties in a safe manner. Responsibilities and leadership skills include:

- Maintain a positive safety attitude.
- Work responsibly within WorkSafeBC requirements.
- Understand the following 3 fundamental WorkSafeBC rights:
 - **Right to Participate**
Workers have the right to participate in the protection of their own health and safety (generally done through safety meetings).
 - **Right to Know**
Arkay must provide health and safety information to workers for their protection (OHS Program, Policies, SDS).
 - **Right to Refuse**
If a worker has reasonable cause to believe that, in carrying out a work process, it will create an undue hazard to the health and safety of any person, s/he has the right to refuse work.

Under the Right to Refuse, the following order of actions must take place:

1. **Immediately Report Conditions:** The worker must report the circumstances of the unsafe condition to site management who should then investigate the matter and ensure that any unsafe condition is immediately remedied.
2. **Investigate:** If step one does not resolve the matter, the worker is to phone Arkay management and report the matter. Arkay will then be part of the investigation. If this matter is still not resolved, Arkay management will contact the developer's head office.
3. **Contact Regulatory Authority:** Failing (1) and (2) above, WorkSafeBC will be contacted.

2. LEGISLATION

Regulation is an ordinance, a law, or a directive set by an organization or agency, such as the government, for control of people and their environment.

2.1 FEDERAL LEGISLATION

[Canada Labour Code](#)

2.2 CRIMINAL CODE of CANADA

[Criminal Code of Canada](#)

2.3 PROVINCIAL LEGISLATION

[Workers Compensation Act \(BC\)](#)

ELEMENT 14:

HEALTH and SAFETY MEETINGS

RESOURCES

Legal Reg.
OHSR

Toolbox Talks
00 Toolbox Talk Checklist

SAFETY COMMITTEE POLICY STATEMENT

Arkay's current working arrangement with prime contractors is that Arkay workers come under the prime contractor's safety umbrella when on-site. This means that Arkay workers are part of site safety arrangements.

For Arkay, as a corporate entity, there is discussion about the applicability of the requirements of appointing a Workers Health and Safety Representative or a Joint Occupational Health and Safety Committee (JOHSC). Currently the structure is based on the concept of an OHS Steering Group (OHSSG) executing those functions. The OHSSG is currently made up of the Arkay management team.

The JOHSC is under review.

ELEMENT 15:

FIRST AID

RESOURCES

Legal Ref.

OHSR3.16-3.18 / Schedule 3-A

Forms

First Aid Record

Report of Injury

Occupational First Aid Patient Assessment

Incident Report (witness & person injured)

1. **RESPONSIBILITIES**

1.1 **ARKAY MANAGEMENT TEAM**

- Provide first aid resources as required for Arkay workers.
- Ensure appropriate first aid is provided as quickly as possible for an injured worker.
- Arkay's Health and Safety Coordinator will demonstrate a commitment to training and education through toolbox talks, certifications, and courses, ensure the on-site Arkay OFA role is clarified, and ensure Arkay Reporting Accidents Posters are distributed to sites.

1.2 **OCCUPATIONAL FIRST AID ATTENDANT (OFA)**

The OFA must be physically and mentally capable of performing the required duties safely and effectively. The OFA must carry a valid certificate OFA2 with Transportation Endorsement or OFA3 based on the site requirements. The OFA will:

- Provide injured workers with a level of care within the certification of training.
- Accurately log observed signs and symptoms of injuries and exposure to contaminants.
- Refer workers whose injuries are considered more serious to medical aid.
- Upon injury or incident, the OFA is responsible for, and has full authority over, the first aid treatment of the injured worker until treatment is taken over by a professional medical facility, paramedics/qualified ambulatory service or an individual with equivalent or higher first aid certification.

Note: Workers have the ultimate say in whether they wish to seek medical attention; the first aid attendant does not have the authority to overrule the worker's decision to seek medical attention or their choice of medical treatment unless they are unconscious and unresponsive in the event of an emergency.

2. **FIRST AID ASSESSMENT**

First aid assessment is based on reviewing various factors including the nature of work undertaken, specialist trades to be engaged, risk profiling of the nature of the building or construction, traffic flows based on 20 minutes response time and distance to the nearest hospital with a 24-hour accident and emergency department. OFA Requirements. ²

3. **FIRST AID RECORDS**

First aid records must:

- Differentiate between the different forms e.g., First Aid Report, Patient Assessment Report, First Aid Follow-Up Report, and the amount of information and detail required.
- Ensure accurate and legible reporting.
- Maintain confidentiality of data and restricted access only to authorized personnel.
- Be available upon request by the injured worker; workers are entitled to view any reports pertaining to them and their injuries.

² See Appendix 1

4. FIRST AID FACILITIES and REQUIREMENTS

During orientation it is required that Arkay workers be made aware of the location of the first aid facility. The first aid facility will:

- Be a non-smoking environment with appropriate signage displayed.
- Be used for first aid purposes only.
- Be easily accessible: Safety signage will be provided to indicate the location of first aid services and how to summon first aid personnel in the event of an emergency. This information will be posted visibly throughout the worksite and communicated to all workers. Arkay workers will be made aware of the location of first aid services and how to contact the first aid attendant.
- Be outfitted with suitable equipment and facilities in-line with WorkSafeBC requirements: The first aid equipment, facilities and services will be supplied by the prime contractor and be readily accessible to workers during working hours.
- All facilities and equipment will be organized and kept in sanitary conditions, ready to use/mobilize, to aid ease of treating injured workers.

5. COMMUNICATION and AVAILABILITY

The first aid attendant must not undertake site activities that interfere with his/her duty to respond promptly to an emergency scenario.

6. FIRST AID REPORTING REQUIREMENTS

First aid records and statistics are kept for 6 years and are available for review to determine trends and recommend corrective actions.

ELEMENT 16:

PREVENTION of VIOLENCE in the WORKPLACE

RESOURCES

Legal Ref.
OHSR

Form
Potential Threats Incident Form

1. **RESPONSIBILITIES**

1.1 **ARKAY MANAGEMENT TEAM**

- Ensure all workers have a safe work environment free of violence and bullying.
- Allocate resources and educate Arkay workers through toolbox talks, website teachable moments, hand-outs, and email blasts.
- Participate in investigations for all reported incidents of actual and perceived threats of violence and bullying.
- Establish a Workplace Violence Prevention Program.

1.2 **ARKAY WORKERS**

- Follow policy for the prevention of violence in the workplace.
- Understand safety rules or ask the CSO for clarification if unsure.
- Report any issues regarding violence or bullying to site and Arkay management – **if not reported it can be argued it did not happen.**

2. **WORKPLACE VIOLENCE**

- Intending physical harm
- Threatening physical harm
- Physical intimidation
- Joking about violence
- Brandishing weapons
- Coercing other workers
- Sexual harassment

The Canadian Human Rights Commission defines unacceptable harassment or discrimination based on:

- Race
- Ethnic origin
- Skin colour
- Age
- Religion
- Gender
- Sexual orientation
- Family or marital status
- Disability
- Pardoned criminal convictions

3. **BULLYING**

Arkay has zero tolerance for any of the following:

- Intending physical harm
- Psychological abuse
- Verbal abuse
- Emotional abuse
- Under-handed or covert threats
- Mobbing (deliberate isolation from a group)

4. **WORKPLACE VIOLENCE PREVENTION PROGRAM**

4.1 **TRAINING and COMMUNICATION**

All workers are required to have orientation training which will include a section on workplace violence and what is acceptable and non-acceptable behaviour in the modern working environment through toolbox talks, email blasts, handouts, and website teachable moments.

4.2 RISK MANAGEMENT

- Arkay will make every effort to identify possible sources of a threat of violence in the workplace and will take steps to eliminate or mitigate the risk so far as possible.
- Arkay will reassess the risks of workplace violence to ensure that policies and programs, through education, continue to protect workers.
- The FLHA form has a section to document threats of violence in the workplace as well as prevention procedures, worker instructions, procedures for reporting and investigating incidents at site, and incident follow-up.

4.3 LEADERSHIP and TEAM BUILDING

Arkay works on the concept of teamwork. There are multiple factors that can contribute to the potential for violence on-site. Arkay strives to make the working environment safe for all workers. Arkay's Health and Safety Coordinator and other management team members frequent sites regularly to ensure issues are not developing which may result in potential threats of violence.

4.4 SAFETY RULES and NON-COMPLIANCE

Safety rules and non-compliance issues are dealt with on a case-by-case basis.

5. HOW to REPORT VIOLENCE or BULLYING³

1. Be proactive and report any perceived threat or actual incident immediately by notifying both site and Arkay management. **“Violence or bullying incidents are not tolerated by Arkay and the prime contractor. These incidents are to be reported as they happen. Waiting to see or trying to solve on one’s own can result in the site determining that, as there is no report, there was no incident.”** Refer to the Policy section, *Bullying and Harassment*.
2. Document the incident – take detailed written notes including the date, time, place, and details of what was said and done, names of witnesses and the surrounding circumstances.
3. If comfortable doing so, clearly communicate to the individual that his or her behaviour or conduct is unwelcome and unacceptable.
4. Cooperate during investigation.

6. PRIVACY

Arkay recognizes that it may be difficult to come forward with complaints of this nature and will make every reasonable attempt to ensure that the privacy of the persons involved in a complaint are protected. Refer to the Policy section, *PIPA*.

7. INVESTIGATION

Investigation of a complaint will be conducted by Arkay management who may request an independent third-party investigation, including the police, as part of the investigation as deemed necessary. Throughout the investigation it may become necessary to interview other witnesses or individuals to obtain information relevant to the investigation. The investigation will be handled discreetly, respectfully, and confidentially.

³ See Appendix 5

ELEMENT 17:

INJURY MANAGEMENT

RESOURCES

Legal Ref.
WorkSafeBC

Form
Monthly Injury Report Summary

1 RESPONSIBILITIES

1.1 ARKAY MANAGEMENT TEAM

- Confirm worker has contact details of assigned Injury Management Coordinator at Disability Management Institute (DMI).
- Participate in the appropriate transitional and modified work plan if applicable.
- Work with supervisors to assess the workplace for suitable modified or alternate work.
- Request completed work capacity forms from the doctor.
- Sign-off on weekly timesheets for those workers on an injury management plan.
- Report on the progress of modified/alternate work situations, as necessary.
- Assist the Injury Management Coordinator in creating a RTW plan.
- Communicate concerns immediately to the Injury Management Coordinator.

1.2 INJURY MANAGEMENT COORDINATOR

The Injury Management Coordinator is responsible for the overall supervision of injury management. Arkay employs Disability Management Institute (DMI) to act on Arkay's behalf as the agent between WorkSafeBC, the injured worker, and the occupational therapist and other specialists. DMI is Arkay's Injury Management Coordinator.

- Communicate the RTW program to workers.
- Participate proactively in the RTW plans.
- Submit copies of completed forms to appropriate personnel.
- Maintain regular contact with an injured worker until injured worker has RTW full time.
- Report accurate payroll information to WorkSafeBC.
- Provide workshops for, and brainstorm with, Arkay.
- Update Arkay per injured worker, provide monthly summaries, and meet with Arkay at Arkay's request including an annual summary overview.

1.3 ARKAY WORKERS

- Comply with Arkay policies.
- Report injury immediately and seek timely medical aid.
- Follow on-site first aid instructions.
- Provide relevant medical info that will assist first aid or treatment.
- Follow restrictions set out by the attending doctor or other health care professional.
- Comply with recommendations of treatment providers and follow RTW, gradual RTW or transitional work guidelines.
- Attend all medical and/or rehabilitation appointments regularly.
- Take personal responsibility for maintaining good health and a positive attitude.
- Communicate to functional lead any difficulties regarding duties as they arise.
- Book health appointments in advance to support site scheduling.
- Report any concerns immediately to Arkay's Safety Manager, DMI and WorkSafeBC.

2. STANDARD PROCEDURES of a RETURN-TO-WORK (RTW) PROGRAM

- Injuries are reported to the site CSO and/or OFA for assessment.
- The worker and supervisor must complete a First Aid Report and an Incident Report, and both forms are to be submitted to the Arkay office within 24 hours.
- Worker must report the results of medical appointments as well as doctor letters including outlining length of absence.
- A doctor letter outlining physical limitations must be completed prior to RTW. *Refer to Appendix 6.*
- If a GRTW (Gradual Return to Work) is required, a doctor letter outlining physical limitations and time limitations must be completed prior to the GRTW. *Refer to Appendix 6.*
- Depending on the injury, a RTW plan may be formulated for the injured worker. Upon review of the worker's GRTW letter, a RTW plan may be formulated for the worker.
- **Failure to complete a RTW or GRTW form may delay a worker's RTW.**
- The injured worker will work closely with Arkay management during the modified or alternate duties.

3. PROCEDURES for MONITORING the INJURY MANAGEMENT PLAN

After an injury has occurred and a RTW plan has been established, Arkay and DMI will:

- Document the RTW progress which includes dates and comments on actions taken.
- Communicate with the injured worker, as necessary.
- Ensure documentation from the doctor is submitted and current.