



DEPARTMENT OF FACILITIES MANAGEMENT

SAFETY PROGRAM

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1.0 INTRODUCTION

Facilities Management (FM) is fully dedicated to the provision of a safe and healthy environment for the staff of Facilities Management, other university employees, contractors, vendors, students and visitors who work within or visit Dalhousie University facilities. To achieve this goal FM has implemented an occupational health and safety (OHS) program based on the highest possible standards.

Facilities Management, as a responsible Department, has developed this Occupational Health and Safety Program in order to:

- Supplement the requirements of the Dalhousie OHS Policy and Programs; and,
- Provide our senior managers, line managers, supervisors, forepersons and employees with additional information specific to the health and safety issues they will face in our many and varied workplaces.

The success of this program demands the full cooperation of management and employees in the performance of their health and safety duties. To help achieve this goal, senior management shall regularly consult and collaborate with the Facilities Management OHS Committee, as well as management and employees, to ensure this program is adapted to the changing needs of their workplace. Our greatest chance of success in this endeavour is to encourage a work environment where ideas and innovation are the basis for change.

The ongoing implementation, monitoring and constant improvement of this health and safety program will help Facilities Management achieve its MISSION to “provide the Dalhousie community with an inviting, safe and sustainable environment which supports and enhances an inspiring experience in learning, living, working and research.”

2.0 RESPONSIBILITIES AND ACCOUNTABILITY

The Nova Scotia Occupational Health and Safety Act stresses that the basis of the Act is the Internal Responsibility System. The Internal Responsibility System is an organizational / operational system within an organization which makes direct responsibility for health and safety an essential part of everyone's job. Regardless of the position a person may hold within an organization they are responsible for addressing safety as it applies to their job and the work they perform. Everyone must take the initiative to implement and improve health and safety on an ongoing basis.

Health and safety is a responsibility shared by senior management, middle management, supervisors, forepersons and employees.

The following principles of the Internal Responsibility System shall be the basis of the Facilities Management OHS Program:

- Personal Responsibility – Each person at the workplace is responsible for identifying hazards and helping to solve health and safety issues.
- Inclusive Process – Everyone regardless of position is expected to participate.
- Cooperation – The employer and employees must participate cooperatively in protecting the health and safety of all persons at the workplace including assuring the right to refuse unsafe work.
- Information Sharing – Information is shared by, and with, all parties except in the case of protected information.
- Pro-active Approach – Taking action before it's too late. When hazards are identified employees should immediately implement appropriate corrective measures to prevent injury, illness involving employees, or, damage to property.
- Accountability – The owner, managers and employees are all responsible for the success of health and safety in the workplace and will be held accountable accordingly.

The degree of responsibility faced by each of the workplace parties for developing, implementing and maintaining a healthy and safe workplace depends on the authority and ability of each employee to initiate change in the workplace.

Because the management structure varies considerably between organizations the Act intentionally avoids defining the responsibilities of people like managers, supervisors and forepersons. The following sections of this manual help to define the responsibilities for all Facilities Management employees based on the degree of authority delegated to their positions. Due the constantly changing nature of position and jobs performed, responsibilities may need to be changed, re-defined or deleted over time.

2.1 Assistant Vice President's Responsibilities:

- Ensuring the health and safety of FM employees and any other persons at or near our workplace.
- Ensuring systematic implementation of the FM OHS Policy and all elements of the OHS Program.
- Establishing and ensuring the effective functioning of the Facilities Management Occupational Health and Safety Committee.
- Ensuring sufficient resources are available for attaining the goals of this program.
- Ensuring that the information, training and education needed by all employees to perform their jobs in a safe and healthy manner is provided.
- Including OHS as a standing item for discussion at senior management meetings.
- Holding Directors accountable for achieving their OHS responsibilities.
- Requiring the preparation of an annual report on FM OHS Program activities.
- Presenting an annual report on FM OHS to the Dalhousie University Joint OHS Committee.
- Ensuring OHS is regarded as a critical component of the FM management system.
- Ensuring that annual planning initiatives adopt measures consistent with continued OHS program development.
- Ensuring that the FM OHS program is audited on a regular basis in order to monitor successes and accurately define areas requiring continued improvement.
- Ensuring that a copy of the FM OHS Policy and Program are available to all employees upon request and for use by OHS Committee members.

2.2 Directors Responsibilities:

- Ensuring the health and safety of all FM employees and any other persons at or near our workplace.
- Holding Managers accountable for the ongoing implementation, monitoring and continued improvement of the FM OHS Program.
- Consulting, and co-operating, with the Assistant Vice President, Managers of the various Services and the FM EHS Committee to ensure FM OHS activities are

carried out in compliance with the requirements of the Nova Scotia Occupational Health and Safety Act, its regulations, the Dalhousie OHS Program and the FM OHS Program.

- Ensuring that the management representatives on the OHS committee have the authority to resolve health and safety issues.
- Ensuring that Managers receive the OHS training they require in order to fulfill their responsibilities.
- Ensuring that OHS committee members receive the training required for them to perform the committee duties specified by the OHS Act.
- Ensuring that Managers are provided with the resources necessary for successful implementation, ongoing development and monitoring of this OHS program.
- Reviewing incident / accident investigation reports on a regular basis and confirming that corrective measures are undertaken.
- Ensuring an annual OHS program review is performed and that a program status report is submitted to the Assistant Vice President.
- Participating in internal or external audits as required.
- Including OHS as a regular standing item at all management meetings.
- Regular review of incident / accident investigations and statistics to ensure corrective recommendations are implemented and reflected in overall improvement of the program policies, procedures and practices.
- Ensuring that a response, to written requests for a response to recommendations, is provided within twenty-one days.

2.3 Managers Responsibilities:

- Implementation, effective operation and monitoring of this OHS program.
- Taking every precaution reasonable in the circumstances to protect the safety and health of employees and any other persons present at our workplace.
- Supporting supervisors and forepersons in their ongoing efforts to develop, implement, monitor and improve this health and safety program.
- Holding supervisors accountable for their OHS responsibilities.
- Ensuring supervisors are made aware of any hazards that may be made known to them by the University, Assistant Vice President or Directors.

- Ensuring co-operation with any Officer specified under the Act and that any Orders given by a Safety Officer are complied with as required.
- Demonstrating support for the FM OHS policy and program by ensuring health and safety is a regular standing item at meetings with supervisors and forepersons.
- Ensuring supervisors receive the support, education and training necessary to enable them to fulfill their responsibilities.
- Reviewing accident investigation reports on a regular basis and confirming that recommended corrective measures are undertaken.
- Ensuring appropriate human and financial resources are included in their annual budgets requests to ensure the implementation and ongoing operation of this OHS program.
- Ensuring the preparation of a written annual OHS program report for submission to senior management.
- Consulting and co-operating with the FM OHS Committee and senior management about health and safety issues.
- Serving as management member on the FM OHS Committee when asked to do so.
- Ensuring that all health and safety issues raised by supervisors, employees and/or the OHS committee are dealt with promptly.
- Working with Directors to ensure that any written request for a response to a recommendation is dealt with within twenty-one days.
- Checking on a regular basis, throughout the year, to ensure that all their employees are following the practices, procedures and requirements of this program.
- Working with senior management to facilitate auditing of the OHS program; either by internal staff trained in audit techniques, or, by an external auditor.

2.4 Supervisors Responsibilities:

- Collaborating and cooperating with their Manager in the ongoing development, implementation and monitoring of the FM safety program in order to ensure a safe and healthy workplace.

- Ensuring that every reasonable precaution is taken to protect the health and safety of FM employees and any other persons.
- Keeping current with and maintaining a working knowledge of all aspects of the work performed by their employees and the tools, equipment and materials required to complete such work.
- Ensuring that all employees know, understand and follow the requirements of the OHS Act, its regulations, the Dalhousie OHS Policy and Program and the FM OHS Policy and Program and all other relevant Acts, regulations and Codes of Practice.
- Ensuring that newly hired employees receive safety orientation.
- Ensuring that workplace hazard assessments are performed and documented and that control measures for all identified hazards are developed and implemented immediately.
- Ensuring that employees are made aware of any hazards that exist in the workplace.
- Ensuring that employees receive any safety training required for them to perform their jobs in a competent, healthy and safe fashion.
- Ensuring all employees are appropriately trained and certified in the effective and safe use of tools, equipment and materials required in performing their jobs.
- Ensuring that all required personal protective equipment is available and that employees are trained in its proper use, care and storage as recommended by the manufacturer.
- Providing instruction and supervision to employees to ensure they perform their duties in a healthy and safe way.
- Holding employees accountable for working in compliance with the OHS Act, the regulations and the Dalhousie and FM OHS Programs, and, when necessary disciplining employees for non-compliance.
- Integrating safe work practices and safe job procedures into the daily work activities of all employees.
- Serving as JOHS Committee member when asked to do so.
- Cooperating with, and ensuring their employees cooperate with, the OHS Committee.
- Monitoring and evaluation of work flow processes for ability, safety and efficiency and making corrective adjustments to achieve ongoing program improvement.

- Including health and safety requirements in their annual budget estimates.
- Ensuring compliance with any order from an OHS Officer of the NS Department of Labour and Workforce Development, Occupational Health and Safety Division.
- Ensuring that any complaints, concerns, reports of hazards or recommendations they receive are dealt with promptly and as required by the Act.
- Ensuring that appropriate emergency equipment, materials and procedures are in place to meet the needs of the workplace.
- Ensuring safety considerations are integrated into the purchasing of all goods, services, materials, equipment and machinery.
- Ensuring that regular workplace inspections are performed and that action is taken immediately to deal with identified deficiencies or issues of non-compliance.
- Ensuring that all equipment, materials, machines, etc. purchased for use in the workplace are safe and equipped with necessary safety devices.
- Implementing a scheduled maintenance program for all machinery, tools and equipment.
- Ensuring that all incidents and/or accidents are reported, recorded and investigated, as required by the Act and this OHS program.
- Taking immediate action to ensure that any recommendations contained in accident investigation reports are implemented and that all corrective measures are communicated to employees.
- Working with employees to ensure that all required personal protective equipment is made available, and that it is used, stored and maintained as recommended by the manufacturer.
- Conducting regular staff safety meetings and maintaining records of such meetings.
- Arranging specialized training for staff working in areas where critical hazards can be an issue (Biohazards, radiation, asbestos).
- Promoting health and safety and providing a supportive work environment for employees.
- Ensuring site and project hazard assessments are performed as required.

2.5 General Forepersons Responsibilities:

- Having a working knowledge of the OHS Act, its regulations, the Dalhousie and FM OHS programs and appropriate Codes.
- Ensuring that relevant safe work practices and safe job procedures are followed on all jobs.
- Ensuring that all of their employees work in a safe and healthy fashion.
- Ensuring that their employees know their OHS responsibilities and adhere to them at all times while at work.
- Observing the work performance of their employees and taking corrective action to ensure compliance with the OHS Act and the Dalhousie and FM OHS programs.
- Ensuring that employees assigned to job have all required training.
- Providing “Tool Box Talks” as required.
- Ensuring site and project hazard assessments are performed as required.
- Reporting OHS issues, concerns, hazards or problems to their supervisors.

2.6 Working Forepersons Responsibilities:

- Ensuring site and project hazard assessments are performed as required.
- Ensuring all work activities are in compliance with the OHS Act, the Dalhousie OHS Program, the FM OHS Program and relevant building codes.
- Ensuring the FM safe work practices and safe work procedures are followed at all times.
- Taking corrective action when necessary to ensure that all work is performed safely.
- Reporting as OHS problems to their General Foreperson or Supervisor.

2.7 Employees Responsibilities:

- Ensuring their own health and safety and preventing damage to equipment or property by working safely at all times.

- Ensuring the health and safety of fellow employees as well as other people at their workplace.
- Cooperating with supervisors and managers and the JOHS Committee to address workplace health and safety issues.
- Always working in compliance with the Act and its regulations as well as the Dalhousie policy and program and the Facilities Management OHS policy and program.
- Always using the personal protective equipment or devices required for a given job.
- Always working safely.
- Becoming familiar with and helping to implement any emergency procedures at their workplace.
- Reporting unsafe or hazardous conditions; situations to their supervisor and making recommendations for dealing with such situations.
- Reporting to the OHS committee, any unsafe or hazardous condition or situation that has not been remedied to their satisfaction by their supervisor.
- Reporting any unsafe / hazardous condition or situation to the OHS Division of the Department of Environment and Labour that has not been remedied to their satisfaction by their supervisor or the JOHS committee.

2.8 Project Managers Responsibilities:

- Collaborating and cooperating with the Supervisors and Managers in the ongoing development, implementation and monitoring of the FM safety program in order to ensure a safe and healthy workplace.
- Ensuring that every reasonable precaution is taken to protect the health and safety of FM employees and any other persons.
- Ensure that the Contractor Health and Safety requirements of Section 5.0 are fully implemented with Contractors engaged on projects.
- Serving as JOHS Committee member when asked to do so.
- Cooperating with, and ensuring their contractors cooperate with, the OHS Committee.
- Monitoring and evaluation of work flow processes for ability, safety and efficiency and making corrective adjustments to achieve ongoing program improvement.

- Including health and safety requirements in their project estimates.
- Acts as the FM contact for a contractor's project safety representative where one is appointed.
- Ensuring compliance with any order from an OHS Officer of the NS Department of Labour and Workforce Development, Occupational Health and Safety Division.
- Ensuring that any complaints, concerns, reports of hazards or recommendations they receive are dealt with promptly and as required by the Act.
- Maintaining written records of non-compliance issues involving all constructors and/or contractors performing work at Dalhousie.

2.9 FM EHS Committee Responsibilities

The Facilities Management Environmental Health and Safety (FM EHS) Committee will play a critical role in implementation and ultimate success of this OHS program by providing a forum where management and employees can meet to discuss and address health and safety issues and make recommendations to department management and/or to the Dalhousie EHS Committee. The committee and its members will be responsible for:

- Following the policy and procedures specified for Dalhousie University Departmental or Divisional Environmental Health and Safety Committees in the Dalhousie Environmental Health and Safety program.
- Providing a dynamic forum for management / employee discussion.
- Helping to identify and assess workplace hazards and making recommendations for appropriate control measures.
- Participating in workplace OHS audits to assure compliance with health and safety requirements.
- Receiving, investigating and promptly handling employee concerns and / or complaints regarding health and safety in the workplace.
- Taking part in workplace inspections and accident investigations and accompanying any Safety Officer involved in inspections at the workplace.
- Advising on personal protective equipment and devices that are best suited to the needs of the workplace.
- Providing advice to FM senior management about the OHS policy and program and making recommendations for overall improvement of the program.
- Maintaining minutes of committee meetings and any other records, as required.

- Performing any other duties assigned to it by the Director of the OHS Division, the Dalhousie EHS Committee or as a result of agreement(s) between employees and management.

2.10 Responsibilities of Other Parties

The following service providers, when contracted by Facilities Management to perform work at any Dalhousie Campus or property owned by Dalhousie must perform such work in compliance with the OHS Act and their own OHS programs.

- Section 14 - Contractors
- Section 15 - Constructors
- Section 16 – Suppliers
- Section 18 – Self-Employed People
- Section 20 – Providers of Services
- Section 21 – Architects

Union's, Workers Compensation Board, safety associations, suppliers of goods and services and Nova Scotia Occupational Health and Safety (OHS) Division are external parties that to varying degrees and for various reasons are also involved in our safety activities.

Internally we can turn to the Facilities Management OHS Committee, the Dalhousie OHS Committee, the Environmental Health and Safety Office, Dalhousie legal support, the purchasing department and others for help in achieving our safety goals.

However, the ultimate success of this health and safety program depends on senior management, middle management, supervisors, forepersons and employees, actively participating in the identifying and solving of our workplace issues. To do this it is imperative that we all understand and fulfill the responsibilities of our position. All of these people must be proactive in immediately addressing health and safety issues that arise.

If at any time the duties or responsibilities defined by this manual are in conflict with the Nova Scotia Occupational Health and Safety Act or the Dalhousie University OHS Program the Act and /or the Dalhousie OHS Program shall prevail.

3.0 EMPLOYEE RIGHTS

Employees play a critical role in ensuring the success of this health and safety program by complying with their precautions and duties as required by the Act. Their ability to do so depends in great part on being informed, having access to information about hazards in the workplace and having the ability to speak freely about any unsafe conditions that may exist. The OHS Act guarantees employees three special rights that help to ensure they have access to a safe and healthy workplace.

- The Right to Know – every employee has the right to know about workplace hazards or issues that might, or will, affect their health and/or safety.
- The Right to Participate – every employee has the right to participate in health and safety activities such as serving as a member of the joint occupational health and safety committee, reporting any concerns they have about unsafe practices or conditions in the workplace and / or participating in workplace inspections.
- The Right To Refuse Dangerous Work – employees have the right to refuse dangerous work. When exercising this right, the employee must have reasonable grounds for believing the work will endanger their health or safety or the health or safety of other people at the work site.

Supervisors must inform their employees about the hazards associated with their jobs. Supervisors must also encourage employee participation by asking for their input on safety issues and by encouraging them to become active members of the FM Health and Safety Committee when new members are required.

4.0 EXERCISING THE RIGHT TO REFUSE DANGEROUS WORK

Every employee has the right to refuse dangerous work if they have reasonable grounds for believing that the work will endanger their health or safety or the health or safety of others.

An employee may not refuse to work, operate a machine or other equipment if by doing so they put the health, safety or life of another person in danger, or, if the danger is inherent in their work.

Under no circumstances can a supervisor take discriminatory action against an employee who has exercised the right to refuse dangerous work. For further guidance on this subject see Section 45 (1), (2) and (3) of the Act.

Department supervisors and the OHS committee are to regard any refusal to work as a very serious matter and deal with it immediately.

The exercising of the right to refuse by an employee initiates a formal process that must be followed by all of the parties that become involved.

During a refusal supervisors must consider the following:

- Subject to any applicable collective agreement or Section 43 (3) of the Act, the employee's supervisor can reassign the employee to other work and the employee must accept the reassignment until the employee can return to the work because the matter has been satisfactorily resolved.
- Prior to re-assigning an employee the supervisor shall ensure the employee has received all required OHS training for the job.

During the refusal, the employee is to be paid their regular wages. The employee is not to be paid in excess of the wages they would receive for a regular day if they choose to accompany a committee member or a Safety Officer during their investigation and the investigation goes beyond the regular hours worked.

When an employee has refused to do a particular job, another employee can not be assigned to do that job without first being told about:

- the pending refusal by the other employee
- the reason for the refusal, and;
- that they also have the right to refuse.

Sections 43 and 44 of the OHS Act deal with the right of employees to refuse dangerous work and should be consulted if further guidance is required. In the case of any discrepancy between the information in this OHS program and the Act, the Act prevails.

The Refusal Process

Before exercising the right to refuse, an employee should consider the following questions:

- Will my refusal to work put the health, safety or life of another person, or persons, in danger?
- Is the danger that forms the basis of my refusal inherent to the job I am performing? (A refusal cannot be based on dangers inherent to a job.)
- Have I made every effort possible to correct the situation either by implementing appropriate controls or by eliminating the problem completely?
- Have I tagged or clearly identified the hazard / danger in such a way as to alert other employees to its existence?

Once an employee is satisfied that they have reason to proceed with a refusal to work they must take the following steps, in the order given, until the refusal has been dealt with satisfactorily.

Any employee exercising their right to refuse dangerous work can, if they wish, participate in the investigation undertaken by the Supervisor, OHS Committee, or by a Safety Officer if things progress to Step 3.

Step 1

The employee must immediately report to their supervisor in order to:

- inform the supervisor about the situation or condition and that they are exercising their right to refuse to do dangerous work.

When an employee makes a verbal report to their supervisor that they are exercising their right to refuse FM supervisors are required by this program to have the employee fill out the FM Report of a Hazard or Concern / Refusal to Work form. This provides a written record of the employee's refusal and the supervisor's actions in addressing the refusal.

This written record will be useful as a reference document during implementation of recommendations by the supervisor or if the employee chooses to report their refusal to the FM OHS committee or the Occupational Health and Safety Division.

The employee is to remain at a place designated by their supervisor while their refusal to work is investigated.

Immediately upon being informed of a refusal to work, the supervisor is to investigate the situation and decide whether a danger exists. If the supervisor concludes that no danger exists he / she must provide the employee with an explanation of their findings

and ask the employee to return to work. If the employee agrees with their supervisors findings they must return to work.

If the supervisor concludes that a danger /hazard exists they must immediately secure the area involved, warn any other employees that might be affected that the danger exists, take immediate action to protect against possible injury. In dealing with the danger / hazard the supervisor should:

- If possible action should be taken immediately to rectify the situation; or,
- If rectifying the situation involves recommendations that require time to implement the work area should remain secured until the danger / hazard has been successfully rectified.
- Inform the employee, and any other employees that would benefit from the knowledge, about the corrective measures taken to rectify the situation.

The supervisor must record their findings, and information about actions they have taken to deal with the situation, on the Report of a Hazard or Concern / Refusal to Work form.

If the employee believes the issue has not been dealt with to their satisfaction by their supervisor they should report their refusal to a member of the Facilities Management OHS Committee.

Step 2

As required by Section 43 (2) (b) of the Act, if the employee believes that the concern(s) that formed the basis of their refusal to work have not been adequately addressed by their supervisor, the employee should report the situation to a member of the FM OHS Committee.

To ensure the matter is addressed in a timely fashion the employee must contact the FM OHS Committee as soon as possible and no later than the end of shift or work day on which the refusal to work was first reported.

The employee must provide the FM OHS Committee member a copy of the completed Report of a Hazard / Concern / Refusal to Work form.

Upon receiving notification of a “refusal to work” the OHS Committee member will notify the Chair of the FM OHS Committee and the Dalhousie EHS Office.

The FM OHS Committee Chairperson and the Director of Environmental Health and Safety will call a special meeting of the Committee. At this stage the procedure defined in the Dalhousie Environmental Health and Safety Committee Terms of Reference will be followed.

Please see the following web site for further information.

http://environmentalhealthandsafetyoffice.dal.ca/radiatio_2005.html

Step 3

If, after taking the above two steps, the employee still believes that the concern forming the basis of their refusal has not been remedied to their satisfaction, the employee is to report the problem to a Safety Officer at the Nova Scotia Department of Labour and Workforce Development, Occupational Health and Safety Division.

The responding Safety Officer will investigate the employee's reasons for the refusal and prepare a report containing their findings and recommendations. Any recommendations or Orders provided by the Safety Officer are to be acted upon immediately.

5.0 PROCEDURE FOR REPORTING HAZARDS OR CONCERNS

Section 17 (2) of the OHS Act requires any employee that believes a “condition, device, equipment, machine, material or thing or any aspect of the workplace is or may be dangerous to the employee’s health or safety or that of any other person at the workplace” to report it to their supervisor immediately. In other words anything that an employee believes has the potential to be a hazard to their health or safety or raises a health and safety related concern must be reported.

All Facilities Management employees must be informed of their obligation to report any hazardous situation, condition, etc as well as the necessity of reporting health and safety related concerns. Most importantly supervisors need to help employees understand that the reporting of hazards and concerns can help to make the workplace safer for everyone.

Section 17 (2), (a), (b) and (c) define the three steps required by the OHS Act when an employee reports a hazard or concern. Additional guidance is provided by the Dalhousie Environmental Health and Safety Office bulletin titled **Do You Have a Health or Safety Question or Concern?**

Employees should be informed that they should not approach the Dalhousie EHS Office about this type of issue before they take the following steps as required by the Act.

Step 1

Employees must report hazards or concerns or raise questions with their supervisor before taking any further action.

By taking this step first we are supporting a key principle of the Internal Responsibility System by giving supervisors, as first managers (representing the employer), the opportunity to deal with their workplace health and safety issues and fulfill their OHS responsibilities.

If the employee’s initial report is made verbally the supervisor is to ensure that a written record is created by having the employee complete a Report of a Hazard or Concern / Refusal to Work form before they finish their shift.

When a supervisor receives a report of a hazard or concern from an employee they are to investigate the situation immediately and record the results of their investigation as well as any information about corrective measures that are to be taken using the Report of a Hazard or Concern / Refusal to Work form. Based on the findings of the investigation the supervisor shall:

- If necessary, take whatever immediate actions are required to prevent employees or other persons from being injured
- Initiate whatever corrective measures are required to deal with the situation

- Inform the employee, other employees or any other persons that may be effected by the condition / situation about any corrective measures that will be implemented to deal with the reported concern.
- Monitor the implemented corrective measures to ensure that they are working and that no hazard has been created as a result of their implementation.

NOTE: If at any time an employee decides to initiate Step 2 of this process it is highly recommended that the employee first approach a member of the Facilities Management OHS Committee. Although this adds a fourth step to the process, in most cases the issue should be dealt with faster since the management / employee make-up of the FM OHS Committee is much more knowledgeable about Facilities Management activities. The process defined by the following steps reflects the intent of this recommendation.

When an employee reports a hazard or concern it is extremely important that the employee and the supervisor make every effort to work together to deal with and solve the hazard or concern.

Step 2

If the employee believes that the matter has not been dealt with adequately by their supervisor, they are to report the matter to their representative on the Facilities Management OHS Committee and provide the member with a copy of the completed Report of a Hazard or Concern / Refusal to Work form.

When a committee member receives a report about a hazard or health and safety concern they are to take the following steps:

- Determine what has occurred by reviewing the Report of a Hazard or Concern / Refusal to Work form and discussing the situation with the employee.
- If the matter has university wide ramifications then the Committee Member should ensure that the employee report goes to the Dalhousie EHS Committee.
- Confirm with the employee that they approached their supervisor about their concern and that supervisor has had ample opportunity to take action to deal with the concern.
- In necessary, encourage the employee and the supervisor to continue to work together to resolve the situation.
- If the issue cannot be resolved between the employee and their supervisor the committee member should raise the issue at the next EHS committee meeting.
- Depending on the potential or apparent seriousness of the situation the committee member should speak to the committee Chairperson about calling an emergency meeting.

- Make every effort to inform the employee, within one shift, of what is being done to address their concern.

If the employee believes that their complaint is not being dealt with in a satisfactory fashion by the FM EHS committee they should contact the Occupational Health and Safety Division at the Department of Labour and Workforce Development.

See the example Rules of Procedure found in Section 6.9 of this manual for the steps to be taken by the OHS committee when responding to concerns or hazards reported by employees.

6.0 THE FACILITIES MANAGEMENT JOHS COMMITTEE

Dalhousie University has formed a JOHS Committee in order to comply with Section 29 of the OHS Act and Section E4 of the Dalhousie Environmental Health and Safety Policy. To supplement the role of this committee the Assistant Vice President has established the Facilities Management (FM) OHS Committee to involve management, supervisors and employees in the development, implementation and monitoring of the FM OHS Program. The Assistant Vice President is responsible for ensuring the effective functioning of the Committee.

The FM JOHS committee shall act as an advisor, consultant, and promoter for safety, rather than being responsible for actually 'doing' / managing safety.

Our Departmental Joint Occupational Health and Safety (JOHS) Committee shall be comprised of a dedicated group of managers and employees and is an internal contributor to the Internal Responsibility System. Our OHS committee is the vehicle through which employees and management work together to achieve the shared health and safety goals and objectives of the workplace. The committee does not have the responsibility for managing safety, it exists to monitor program activities and call into question any decline in the program or failure to work in compliance with the Act.

The purpose of this section of the FM OHS Program is to provide further guidance for the establishment and ongoing successful operation of the Facilities Management OHS Committee.

6.1 Committee Membership

The total number of committee members shall be decided by the Assistant Vice President of Facilities Management (in consultation with his / her Directors). At least half of the committee members shall consist of FM employees that are not involved in management. Management will choose up to half of the committee members if they choose to do so.

Selecting the best people as employee and management committee members is extremely important. These people must be prepared to actively represent the opinions and concerns of their fellow employees. The following are attributes that should be considered when choosing committee members to help ensure the best possible representatives are chosen.

- An obvious interest in health and safety.
- The ability and willingness to communicate with other employees.
- Knowledge through training and experience of the work performed by the people they represent.

- Knowledge and understanding of the hazards associated with their work and the workplace in general.
- A willingness to learn and develop the skills and knowledge of a good committee member.
- The ability to participate in a consultative, non-adversarial process that leads to decisions and recommendations that will ensure the continued development, monitoring and improvement of this OHS program.

Employee members shall be selected by the employees they represent or by the unions that represent the employees.

Alternates should be selected for each member for the purpose of attending meetings when the regular member is unable to attend.

A list of the names of current committee members, and alternates, is to be posted on every health and safety bulletin board in the workplace. The list must include the members work phone number and the department in which they work. The list must be updated when ever members leave or join the committee.

6.2 Roles and Responsibilities of the JOHS Committee

The purpose of our Health and Safety Committee is to provide a forum in which employees and management use their combined knowledge and experience to address workplace health and safety problems, decide upon solutions and make recommendations to management for implementing corrective measures.

In order to meet the basic requirements of the OHS Act and this OHS program the FM OHS Committee must, in carrying out its goal of contributing to a successful OHS program, adhere to the following required functions:

- Working with management and their fellow employees to identify health and safety hazards and to develop control measures for dealing with such hazards.
- Auditing / monitoring workplace compliance with the health and safety Act, regulations, the Dalhousie University EHS Program as applicable, and this program.
- Receiving, investigating and promptly dealing with any issues and/or complaints about health and safety in the workplace.
- Participating in workplace inspections, inquiries and accident investigations involving the occupational health and safety of employees.
- Participating in workplace inspections performed by a Safety Officer.

- Providing advice, recommendations and feedback to Senior Management, Service Managers and Supervisors about personal protective equipment, clothing and devices that are used, or being considered for use in the workplace.
- Providing advice to the Assistant Vice President and Directors about the OHS Policy and Program and if necessary making recommending for improvements.
- Maintaining records and minutes of committee meetings by using approved formats.
- Carrying out any other activities assigned by the OHS regulations or as a result of discussions, and agreement between the employer, the committee the Director of the Division of Occupational Health and Safety.
- Selecting an employee to observe monitoring and taking of examples in the workplace.
- Assisting in an annual review of the Facilities Management OHS policy and program
- If necessary, working with the employer to develop and / or review any policy or procedure that may be required for improvement of the health and safety program;
- Performing any other duties that may be required by the OHS regulations or the Director of the Occupational Health and Safety Division.

Further to the above functions the following procedures, found in the Departmental or Divisional Environmental Health and Safety Committees Section of the Dalhousie Environmental Health and Safety Program, are included here to provide additional specific clarity and guidance regarding the Facilities Management Committees activities.

Reporting to the Assistant Vice President of Facilities Management the Committee will:

- Recommend policies, procedures and guidelines and / or Codes of Practice for all aspects of health and safety within the Department, so as the Department will maintain the highest possible standards of occupational health and safety, and be in compliance with provincial and federal laws.
- Recommend such alterations to the physical facilities or work practices it may deem necessary or desirable in order that all work may be carried out in a safe and healthy manner and submit these recommendations to the Assistant Vice President.
- The Committee will strive to promote the cooperation of all members of the Department or Division in encouraging safe work practices and for a safe environment, and to this end will, when deemed necessary, prepare and

distribute such education and informational materials as may be appropriate, and arrange educational meetings as appropriate.

- With the agreement of the Assistant Vice President the Committee may solicit advice, help, and input from any experts or any others that the Committee deems may be helpful in its deliberations on any problems.
- Monitor Departmental or Divisional health and safety performance and report annually through the Assistant Vice President to the members of the Department and the Dalhousie Environmental Health and Safety Committee.

6.3 Meeting Agendas

An agenda is to be drafted prior to each meeting to ensure business is addressed in an orderly fashion and within the time frame provided. Committee members should provide agenda items to the secretary well in advance of each meeting. Agendas will be drafted according to the committee Rules of Procedures.

6.4 Successfully Conducting a Meeting

For Committee meetings to be productive and to help ensure that committee member enthusiasm will remain high meetings must be run effectively.

Meetings are most successful when:

- All committee members regularly attend meetings. Employees recognize that their committee work is as important as any other part of their job.
- Committee members ensure their alternate attends meetings when they are unable to so.
- Committee members come to meetings prepared to discuss agenda items, particularly those items pertaining to their area of work.
- Meetings start on time.
- The prepared agenda is followed to ensure topics are discussed.
- Only one agenda item is discussed at a time.
- Discussions of items not on the agenda are avoided. Members can ask to add items to the agenda at the start of the meeting or the items can be put on the agenda for the next meeting.

- The goal of any discussion about an agenda item is to come up with a solution to the issue.
- Action items are addressed within the time specified and the responsible person comes to meetings prepared to provide status reports if required.
- Recommendations to management are made in writing and when necessary are accompanied by a letter requesting a written reply.
- Minutes are kept for all meetings following the approved format.
- Meetings end on time and on a positive note.
- Solutions or decisions are reached by consensus rather than by a majority vote. (Also see Decision Making in the Rules of Procedure.)

6.5 Responding to an Employee Refusal to Work

See Section 4 of this manual and the following JOHS Committee Rules of Procedure – Responding to an Employee Refusal to Work.

6.6 Responding to Concerns or Hazards Reported by an Employee

See Section 5 of this manual and the Committee Rules of Procedure for information on responding to employee concerns or complaints.

6.7 Management Response to Committee Recommendations

If management receives a written recommendation from the OHS committee, and it is accompanied by a request in writing for a written response to the recommendation, management must respond in writing within 21 days. Upon receipt of such a request management is to immediately write to the committee acknowledging receipt of the request.

Any written reply from management must either indicate acceptance of the recommendation and an explanation of what will be done to comply, or must provide reasons for management's disagreement with the recommendation. If efforts to deal with a recommendation are ongoing, management must still provide a written reply within 21 days explaining the reasons for any delay and indicating when action will be taken. In the latter case a written response should be sent to the committee as promptly as possible.

6.8 Training of Committee Members and Alternates

As required by Section 13 (2) (c) of the OHS Act and, all JOHS committee members, and their alternates, will be provided with a JOHS Committee Training Course to enable them to properly fulfill their roles as committee members.

Management will ensure that all OHS Committee members, and alternates, are given the required time off from their regular duties to attend Committee training sessions and that they are compensated, as required by the Act, for time spent in training.

Committee training must include the following subjects:

- The OHS Act and an overview of all regulations with specific attention being given to regulations relevant to Facilities Management work activities.
- The internal responsibility system.
- The Facilities Management OHS policy and program.
- Basic health and safety concepts.
- How to deal with employee complaints and work refusals.
- Proper operation of a committee including:
 - development of rules of procedure
 - how to properly conduct meetings
 - keeping minutes of meetings
 - making recommendations
 - record keeping
 - communication
- How to identify and assess workplace hazards
- Performing workplace inspections
- Evaluation of the OHS policy and program and employee training programs
- Participating in accident / incident investigations
- Problem Solving
- Emergency procedures
- Workplace Hazardous Materials Information System

Any additional workplace specific training that will aid committee members in performing their duties is to be considered and provided when necessary.

6.9 Rules of Procedure

Rules of procedure are to be prepared by using the following example.

Once completed and approved by the committee the rules of procedure will become the guiding principles for ensuring the committee functions in an effective and business like fashion. If procedural questions arise due to a discrepancy between the rules of procedure and the Act and/or the regulations, the Act or the Regulations Respecting Joint Occupational Health and Safety Committees shall prevail.

Occupational Health and Safety Committee

Example Rules of Procedure

This committee shall be known as:

Facilities Management Environmental Health and Safety Committee

Committee Membership:

Representation on this Environmental Health and Safety Committee will be as follows:

# of Employees	Unit/Crew/Position	Employee Group
1	Assistant Vice President, Facilities Management	Management
1	Director of Operations	Management
1	Administration, Finance and Logistics Unit/Group	NSGEU 77
1	Campus Planning Unit	NSGEU 77 and DPMG
6	Operation Unit (2) Custodial Services (day and evening rep) (1) Shops (Carpentry/Paint, Electrical/Access Control/Instrumentation and Mechanical) and Thermal Plant (1) Minor Projects (1) Environmental Services (1) Zones	NSGEU 77, 99 and DPMG
1	Security Services	NSGEU 99
1	Trades Services Manager	Management
1	Custodial Services Manager	Management
1	Assistant Director, Minor Projects	Management

Resource:

Position/Title	Employee Group
FM EHS/ED Coordinator	Management
Director, Environmental Health and Safety*	University
Secretary	

*The Director of Environmental Health and Safety will participate as a non-voting member, providing support and guidance.

An alternate should be selected for each of the above employee and management members for the term specified by these Rules of Procedure. The alternate will attend meetings when the member is not available. Management alternates must be people with equal or greater authority.

Purpose of this Committee

This Facilities Management Occupational Health and Safety Committee is intended to provide employees and management with a forum in which to work together, in a spirit of cooperation; to identify and solve workplace health and safety related issues, and, to support ongoing implementation of the Facilities Management Occupational Health and Safety Policy and Program, the requirements of the Dalhousie Environmental Health and Safety Committee and to meet the requirements of the Nova Scotia Occupational Health and Safety Act.

Selection of a Chairperson and Secretary

Unless another acceptable arrangement is agreed upon the committee shall, at its first meeting each year, elect two co-chairpersons, one from the management members and one from among the employee members.

At their first meeting the committee shall also decide on a schedule for the Co-Chairpersons to share the chairing of committee meetings for the rest of the year.

The OHS Committee Co-Chairperson shall, as a minimum, be responsible for:

- preparing the agenda for each meeting
- reviewing previous minutes prior to each meeting
- maintaining control of meetings
- acting with an unbiased point of view
- calling emergency meetings

The committee secretary shall either be appointed from among the committee members or from among Facilities Management staff. The secretary's duties will be as follows:

- ensuring a room is available for each meeting
- assisting the chairperson to prepare the agenda for each meeting
- notifying members of meetings
- recording, typing and keeping copies of the minutes of all meetings
- dealing with correspondence
- ensuring the chairperson receives a copy of the completed minutes for distribution to committee members and posting on bulletin boards.

Quorum

A quorum for regular meetings of the Committee shall be at least (3) representatives of each party.

A quorum for emergency meetings of the Committee shall one manager and two employees.

The Committee will normally seek to operate by consensus without the need for formal votes.

When a member requests a formal vote and when a sufficient number of members are present to establish a quorum, a motion will be carried when supported by one half plus one of the members present.

In the absence of a quorum, a Committee meeting will continue except that no formal votes may be conducted.

Agendas and Minutes

The agenda is to be circulated at least two (2) days prior to the meeting.

Minutes of each meeting of the Committee shall be prepared as promptly as possible after the close of the meeting. All Committee members shall receive an approved copy of the minutes within seven (7) business days from the close of the meeting.

Minutes of a meeting shall be reviewed and approved at the next meeting. Any changes required to the minutes shall be recorded in the minutes of the meeting at which the changes were approved.

Conduct of Meetings

When chairing a meeting the Co-Chairperson will be responsible for running an orderly and productive meeting. The Co-Chairperson is to serve as a non-bias arbiter at all times.

The Co-Chairperson will ensure that each committee member is given ample opportunity to participate in meetings and to have their opinion heard.

If a vote is required at a meeting, each member will have a vote. The Co-Chairperson is to abstain unless their vote is required to break a tied outcome.

If a question arises about how the business of a meeting is being conducted the Co-Chairperson should refer to Robert's Rules of Order.

Decision Making

The committee shall make every effort to arrive at decisions on the basis of consensus among its members.

If after discussing an issue the committee is unable to reach consensus the issue can be put to a vote. Under such circumstances one of the committee members, upon being recognized by the co-chairperson, should make a concise motion that clearly defines action to be taken in order to deal with the issue.

If the motion is seconded by another member the Co-chairperson will call for a vote. If the motion is not seconded it is to be dropped. The subject can be discussed at a future meeting when more information is available.

If the motion is seconded the Co-chairperson should restate the motion and ask for any further discussion on the issue. At the completion of discussion or if there is no further discussion the Co-chairperson shall call for the vote.

Term of Office

Committee members shall serve a one-year term. Members may be reappointed to serve subsequent terms. When an employee resigns as a committee member, the employees that were represented by that employee shall promptly select a new representative.

If a department does not have representation on the committee because its employees are avoiding selecting someone, the Assistant Vice President of Facilities Management shall appoint an employee to fill the vacant spot on the committee.

If employees and management cannot reach agreement on the formation of a committee the Director of the Division of Health and Safety can be contacted and asked to intervene and help with the committee formation.

Functions of this Committee

The employee and management members of the committee shall work together to fulfill the following committee functions on an ongoing basis:

- Identification of health and safety hazards and effective ways in which to control or eliminate such hazards.
- Auditing of compliance with health and safety requirements in the workplace.
- Receiving, investigating and promptly initiating appropriate actions to deal with issues and complaints regarding workplace health and safety.
- Participating in scheduled workplace inspections.
- Participating in inquiries and investigations performed by a Safety Officer.
- Participating in workplace incident and accident investigations.
- Providing advice and recommendations regarding personal protective equipment, devices and clothing for use at the workplace.
- Advising the employer regarding the Facilities Management OHS policy or program.
- Make recommendations, to the employer and the employees or any other people working in the workplace, which will help to ensure or improve the health and safety of these people.
- Maintaining records and minutes of committee meetings, and, when requested provide a Safety Officer with a copy of these records or minutes.
- Performing any other duties assigned to the committee.
- Planning employee training and addressing preventive maintenance requirements.
- Meeting any additional functions that are or may be required by the Dalhousie Environmental Health and Safety Program.

Frequency of Meetings

The Committee shall normally meet once a month. Additional special or emergency meetings can be called by the Co-Chairpersons as and when they are required. Meetings shall normally take place during working hours.

At its first meeting each year the committee shall schedule a day, or date of the month, and a time for its meetings to be held during the rest of the year. Establishing dates and times in advance is intended to help members plan their schedules accordingly and ensure that meetings occur as required; however, dates can be changed on occasion by committee agreement.

Notice of Meetings

Notice of regular meetings shall be by circulation of the agenda for the meeting as approved by the Co-Chairperson.

The agenda shall be circulated to committee members no later than two days before the meeting date.

Emergency Meetings

If necessary, emergency meetings are to be called to deal with refusals to work, concerns or complaints, Orders or Directives issued by a Safety Officer or other very important health and safety issues.

An emergency meeting can be called by either of the Co-Chairpersons.

When giving notice of an emergency meeting the Co-Chair is to give as much advance notice as possible to allow for scheduling during normal working hours but within a reasonable time frame given the nature of the issue to be dealt with at the meeting.

If the nature of the matter requires it to be dealt with expeditiously and a normal quorum for a meeting cannot be reached then the meeting can be called with a quorum for an emergency meeting.

Emergency meetings can be scheduled outside of normal working hours on the approval of management. Management should approve such meetings given the fact they are likely to be infrequent and extremely important in nature.

Special Meetings

A special meeting can only be called for at a regular or emergency meeting because the meeting has already exceeded the allotted time and important business is still outstanding.

The purpose of the special meeting is to enable the committee to finish dealing with a business item or to deal with new business that can not wait until the next regularly scheduled meeting.

A special meeting can be called by either of the Co-Chairpersons.

Posting and Circulation of Minutes

A copy of the minutes of each committee meeting shall be promptly posted on all OHS Bulletin Boards and/or other prominent locations for all employees to see. The minutes are to remain posted until replaced by the minutes of the next committee meeting.

Copies of minutes should also be circulated to all committee members and to anyone referred to in the minutes to ensure these people review the accuracy of the minutes prior to the next meeting (within 7 business days).

Responding to an Employee Refusal to Work

When an OHS committee member receives a refusal to work complaint they are to follow the steps specified for an OHS committee member in Section 4, Step 2 of this manual. When these steps have been completed the committee member is to report the refusal to the chairperson of the OHS committee.

Immediately upon notification of a refusal to work the OHS committee Co-chairperson shall call an emergency meeting of the OHS committee to inform them of the refusal to work. **When ever possible the entire OHS committee should meet to discuss a refusal to work.**

If it isn't possible for the entire committee to meet, the committee Co-Chairperson should establish a sub-committee consisting of at least one management member and one, or more, employee members to investigate the refusal to work. The investigation is to be completed within one shift worked by the employee that has refused to work.

Upon completion of its investigation the sub-committee must decide whether it agrees or disagrees with the employee. If the sub-committee disagrees with the employee and intends to recommend that the employee returns to work their decision must be unanimous. The sub-committee is to record its findings in the appropriate sections of the Report of a Hazard or Concern / Refusal to Work form.

If one or more of the investigating committee members concludes that the work is unsafe, or unhealthy, the committee is to immediately make recommendations to the employee's supervisor to have the problem corrected.

When the problem is fixed the OHS committee chairperson should inform the employee and advise them to return to work.

If the OHS Committee is unable to unanimously agree on whether it is safe for the employee to return to work, or, if the employee believes that the problem still hasn't been dealt with to their satisfaction the employee should contact a Safety Officer at the Department of Labour and Workforce Development. The officer will investigate the situation and prepare a report that justifies their findings. **See Step 3 of the refusal to work process found in Section 4 of this manual.**

Responding to an Employee Concern or Complaint

If the OHS Committee or a committee member is approached by an employee wishing to file a complaint or concern they should determine whether the situation or hazard presents an immediate danger to other employees or any other persons. If such a danger exists steps should be taken by the employee's supervisor to secure the area, condition or item involved.

If an immediate danger exists an emergency OHS Committee meeting should be called. If a quorum can not attend an emergency meeting then the Co-Chair or a committee member appointed by the Co-Chair is to investigate the concern following committee procedures.

If the employee's concern or complaint does not require immediate attention it is to be dealt with by the committee at its first regularly scheduled meeting immediately following receipt of the complaint or concern.

When an employee concern is brought to the OHS committee by a committee member the committee is to take the following actions as quickly as possible:

1. Ensure that the employee and their supervisor have made every effort to deal with the situation.
2. Immediately investigate the employee's concern and clarify all the relevant facts.
3. Upon completion of their investigation the committee should make a recommendation to the employee's Supervisor and the Manager in charge of the employee's Shop about how to deal with the employee's complaint.
4. Provide the employee with a status report on how their concern or complaint is being addressed before the end of the next shift worked by the employee.
5. Enter the committee findings, decisions and recommendations in the appropriate spaces of the Report of a Hazard or Concern / Refusal to Work form.
6. If after receiving the committees status report the employee believes that the matter is still not being dealt with to their satisfaction they have the option of contacting a Safety Officer at the Dept. of Labour and Workforce Development, Occupational Health and Safety Division, about the matter.
7. If the employees issue involves an immediate source of danger and/or if management does not take immediate and appropriate action to address the issue, the committee chairperson should report the matter to a Safety Officer at the Department of Labour and Workforce Development, Occupational Health and Safety Division.

Workplace Hazard Identification and Assessment

If in responding to a concern or complaint, or as part of activities associated with continued program development, management decides to initiate hazard identification and assessment activities they are to inform the committee of such activities so the committee can be involved.

The committee shall appoint at least one member to participate in these activities either directing or as an observer and inform the management of their choice.

Management shall give the committee member sufficient notice in advance of doing the identification and assessment activities to allow the member time to arrange to be away from their work.

The committee member must report to the committee, at its next meeting, about the hazard assessment activities.

Accident or Incident Investigations, Inspections or Inquiries by a Safety Officer

Management shall inform the committee of any investigations, inspections or inquiries about to be performed by a Safety Officer.

The committee is to appoint at least one member to accompany a Safety Officer while the Safety Officer is carrying out such activities at the workplace. The committee member shall report on their participation in these activities at the next committee meeting.

Role of the Committee in Supporting the Training Plan

The OHS Committee will support health and safety related training activities by:

- recommending health and safety training courses that will benefit managers and employees
- making sure that committee members have been properly trained with regard to committee functions

Records

Hard copy records of the minutes of all meetings are to be kept on file for 3 years and are to be retained electronically for a minimum of ten years.

Hard copies of committee correspondence or other activities are to be kept on file for at least three years after an issue has been dealt with and stored electronically for a minimum of ten years.

Committee Communication

When the committee sends the employer a recommendation and wants to receive a response, the recommendation is to be accompanied by a written request for a response. The employer must respond within 21 days must indicate either acceptance or reasons for not accepting the recommendation.

If it is not possible to provide a response within the 21 day period the employer must send a letter to the committee explaining why there will be a delay and when a proper response will be forwarded to the committee. This response must be sent to the committee as soon as the employer can make it available.

When the committee believes that an explanation provided by the employer for a delay is not reasonable in the circumstances the co-chairs of the committee shall promptly report this fact to a safety officer.

The Committee shall communicate with employees by posting and making material available as required by the Act.

Workplace Inspections and Monitoring / Tests

As required by the Act, the Assistant Vice President shall inform the JOHS Committee about the existence of any health and safety related reports or orders resulting from any workplace inspections or monitoring or about any monitoring or tests that are about to be undertaken. Upon request, copies of reports of such activities shall be made available to the committee.

Whenever health and safety related monitoring, tests, samples or measurements are performed at a Facilities Management workplace the OHS committee shall appoint a member to observe and receive an explanation of these activities.

If monitoring, tests, samples or measurements take place continuously or on a regular and frequent basis it will not be necessary to observe such activity except during the initial setup of the monitoring equipment, or, if the equipment malfunctions at the time of repair or replacement, or, if there is a change in the process being followed. At such times the committee member will have the right to ask questions and receive explanations about the monitoring, testing, sampling or measurement process.

Whenever such health and safety related activities are undertaken either by Facilities Management, or, by a constructor or contractor working at Dalhousie they shall provide the committee member that has been appointed as an observer with reasonable notification of when such activities will commence.

When such activities are undertaken by, or at the request of, a safety officer they may be undertaken whether or not notification of commencement has been provided to the observer appointed by the OHS committee.

Regular Workplace Inspections

During the first OHS committee meeting of each year a written monthly schedule is to be drafted indicating the date and time for monthly workplace inspections. The schedule shall also indicate areas of the workplace which will be inspected during each inspection. The division of the entire workplace into areas for the purposes of inspections must be done in such a way as to ensure that the entire workplace is inspected at least once each year.

See Section 7 of this Manual for more guidance on performing workplace inspections.

Every month, an employee member of the committee, and a management member, shall perform a workplace inspection based on the schedule prepared by the committee.

The committee members will notify the supervisor of the department to be inspected of the date and suggested time for the inspection and ask that the supervisor and a department employee are available to participate. Times for inspections should not impact negatively on the work activities of the department.

As a minimum, during an inspection, the inspection team will do the following:
(For further information see Section 8 of this manual.)

- Listen to the concerns of workers and managers.
- Help develop the committees understanding of the various jobs and tasks performed in the workplace.
- Identify any existing or potential hazards.
- Monitor how well hazard controls are being used and followed by employees.
 - Examples:
 - Is personal protective equipment properly stored, used and maintained?
 - Are engineering controls in place and are they being used properly?
 - Are safe job procedures and safe work practices being adhered to at all times?
- Monitor activities and the workplace for compliance with the Act and regulations

Regulations Requiring Committee Input

The Occupational Safety General Regulations require specific action by the committee.

The OHS Committee will be consulted about and must provide input regarding:

- Development and/or reviewing of any written policy or procedure required by the Occupational Safety general Regulations.

Monitoring and Evaluation of the OHS Program

On an annual basis the committee shall review and assess the following:

- The OHS Policy
- The OHS Program
- The status of employee training
- Activities of the Committee
- Incident and accident statistics
- Employee awareness and understanding of the program

This process is to be based on the procedures defines in Section 23 of this manual.

Amending the Rules of Procedure

These Rules of Procedure shall be reviewed by the committee annually. Additions, corrections or amendments should only be recommended to management if they have received the unanimous agreement of the Committee or have been adopted by a majority vote of the committee membership.

Sample Agenda

Dalhousie University Facilities Management Occupational Health and Safety Program

Facilities Management Environmental Health and Safety Committee
Meeting Agenda

Date:

Time:

Location:

AGENDA

1. Call to Order
2. Approval of Minutes of Last Meeting
3. Outstanding Items from Previous Meeting
4. Review of Incidents
5. New Business
6. Work Plan Item
7. Conduct Work Place Inspection
8. Adjournment

Sample Minutes

Dalhousie University Facilities Management Occupational Health and Safety Program

Facilities Management Environmental Safety Committee Meeting Minutes

Date:

Time:

Location:

In attendance:

Minutes taken by ...

Business	Action By	Date Required
Approval of Minutes Minutes approved as distributed		

The meeting adjourned at

The next meeting is

7.0 GENERAL SAFETY RULES

A copy of the General Safety Rules is to be posted on all Health and Safety Bulletin Boards.

These general safety rules are to be followed at all times by Facilities Management employees and / or any other persons involved in performing work at facilities owned and operated by Dalhousie University.



General Health and Safety Rules

These General Safety Rules are in addition to the health and safety requirements specific to each employee's job.

- Management and employees must always perform their jobs in a healthy and safe way.
- Report all hazards and/or unsafe conditions to your supervisor immediately.
- All accidents or incidents must be reported immediately to your supervisor.
- If injured, obtain first aid treatment immediately.
- Being under the influence of alcohol or any illegal substances while at work is strictly prohibited.
- Employees are prohibited from arriving at work, remaining at work, or attempting to operate any piece of equipment while their ability to do so is impaired in any way.
- Safe work procedures and safe job practices are to be followed at all times.
- Defective equipment or tools are to be tagged with a "DO NOT USE" tag and the situation is to be reported immediately to your supervisor.
- Tools and equipment are to be used only for their intended purpose.
- All floor areas, hallways, stairways and work areas are to be kept clean, tidy and free of potential hazards.
- Use appropriate signage to indicate wet floors.
- Only properly trained, competent, employees are to operate tools, equipment or machinery.
- Employees must have Workplace Hazardous Materials Information System (WHMIS) training.
- Always use proper lifting techniques.
- Never remove machine guards or other personal protective devices from tools and equipment.
- Always take appropriate / required fire prevention precautions.

8.0 HAZARD IDENTIFICATION, ASSESSMENT AND CONTROL

Hazard Identification and Control Policy

The Department of Facilities Management is committed to establishing and maintaining a hazard management program that will identify, assess and control workplace hazards resulting in a healthy and safe workplace for its employees.

The Facilities Management hazard management program shall, as a minimum, include the following steps:

- Identification of workplace hazards.
- Assessing the level of risk associated with workplace hazards.
- Eliminating hazards when possible or developing and implementing appropriate control measures to minimize their potential to do harm. (During this process the hierarchy of control measures shall be followed at all times.)
- Monitoring implemented control measures to ensure they are effective and taking further corrective action when necessary.
- Holding managers accountable for taking corrective action.
- Performing an annual review of the hazard management system to ensure it continues to address all known and potential hazards in the workplace.

Hazardous situations or conditions that are identified in the workplace shall be dealt with immediately.

8.1 The Hazard Management Process

Vital to achieving the Facilities Management goal of protecting the health and safety of its employees, university staff, students and other people present in the workplace is the implementation of a process for identifying workplace hazards.

The successful implementation of a systematic approach to identification will depend upon the full participation of all managers, supervisor's, forepersons and employee's. Everyone must be fully committed to the process of hazard identification, assessment and control as they go about their jobs on a daily basis and over the long term.

Information about what to do in each of the five steps referenced in the following flow chart and the associated sub-steps is presented in Sections 10.2 through 10.6. While only touching on the subject the information in each section is intended to simplify the hazard identification and risk management process.



8.1.1 Definitions

“*hazard*” any condition, practice or thing that has the potential to cause injury, illness or damage.

“*risk*” a measure of the likelihood that a hazard will cause injury, illness or damage and the severity of such an occurrence.

“*critical task*” a task that has the potential to result in major injury or illness and / or, damage to property, equipment, the environment and / or process when not performed properly.

8.2 Identifying Hazards

Depending on conditions at a workplace the work to be performed, the tools, equipment or machinery to be used, the knowledge and abilities of employees and various other factors hazard identification can be relatively simple or quite complex. Regardless hazard identification requires the person or persons involved to be observant and systematic in their approach. To ensure the greatest level of success in identifying workplace hazards the identification process is to be approached by:

- Slowly working around your workplace and looking for anything that can cause harm.
- Consulting with employees in the workplace about problems they have encountered.

- Looking at what actually happens in the workplace or during the performance of a particular work activity. (Actual practices may differ from the best practices required by this safety program.)
- Thinking about non-routine and / or intermittent activities.
- Consider foreseeable, although unplanned, actions or activities.
- Consider the long term adverse affects of hazards such as noise, hazardous products, and, psychosocial or organizational factors.
- Determine to what degree employees may be exposed and the consequences of the exposure.

Managers, supervisor, forepersons and employees must become skilled at identifying existing and / or potential hazards and implementing appropriate and effective control measures.

The objective of this section is to help all employees develop their ability to identify hazards. To identify hazards that might otherwise go unnoticed it is important to ask yourself key questions about real and potential hazards.

- What types of hazards exist?
- What categories exist?
- What the hazards that we know are associated with a particular job?
- What are the workplace factors that constitute or could constitute hazards?

The coming section will help you deal with these questions.

8.2.1 Types of Hazards

As you start to look for hazards in a workplace carefully consider each of the following four types of hazards. Do any, or all of them, exist at the workplace and what are the categories of hazards that exist in each type.

- **obvious** - hazards such as, unguarded equipment, a wet floor, poor lifting techniques or oily rags stored in a cardboard box.
- **concealed** - hazards such as carbon dioxide, electricity or high frequency noise that may not be immediately obvious.
- **developing** - hazards such as brake pads that are wearing, a worn tire, a cable rope that is beginning to fray, exposure to a chemical over time and will constitute a health hazard in the future.

- **temporary** - hazards such as a machine that overloads from time to time, an expired pesticide spray permit, or overloading of a vehicle.

8.2.2 Categories of Hazards

Once you have identified the types of hazards that exist in a workplace, or as part of a work activity, consider which of the following four hazard categories exists within each type:

- Physical
- Chemical
- Biological; and,
- Psycho-social.

The following table lists these four categories and provides examples of some of the hazards that are applicable to each category. The examples used are a small sample of the hazards that exist in each category, however, they should help you think about what other hazards would naturally fit in that category and might exist in the workplace you are analyzing.

REMEMBER: As work conditions change so may some of the associated hazards. As a result it is important to be constantly alert to and aware of your surroundings and changing work conditions at all times.

Category	Example
Physical	<ul style="list-style-type: none"> • Electrical hazards such as overloaded wall sockets, frayed power cords, plugs with the grounding prong removed or broken, over loaded circuits • Exposure to loud noise • Excessive exposure to vibrations especially in hand held tools and equipment. • Exposure to unguarded moving parts in machinery • Heat and cold • Wet floors • Items left on the floor that create tripping hazards • Airborne dust and fibers. • Over exposure to sunlight or ultraviolet light • Operating equipment with insufficient training. • Working at heights • Over head or falling objects that can cause head

	injuries
Chemical	<ul style="list-style-type: none"> • Compressed gases such as oxygen, acetylene, propane, carbon dioxide, carbon monoxide. • Flammable and combustible materials • Explosive materials • Vapours and fumes from welding, gasoline, etc • Cleaning products • Office supplies • Hazardous product waste
Biological	<ul style="list-style-type: none"> • Molds, mildew, fungal growth • Viruses and bacteria • Poisonous Plants • Bites from insects • Bird and animal feces • Unclean bathroom fixtures • Blood and other body fluids
Psycho-social	<ul style="list-style-type: none"> • Addiction to alcohol or illegal drugs • Harassment • Workplace violence • Stress • Anger • Frustration • Poor physical / mental health • Shift Work • Working Alone

8.2.3 Job Specific Hazards

Employees that have performed a job for a period of time become knowledgeable about things that can be harmful to them, and possibly other employees around them, if nothing is done to prevent accidents from happening. These harmful things are HAZARDS. When you are looking for hazards at a workplace consider what you will do and whether that activity constitutes a hazard.

Listed below are examples of some of the hazards that are faced by Facilities Management employees as they perform their jobs. While not a complete list of all of the hazards associated with a specific job these lists should help supervisors, forepersons and employees understand what to look for when they are identifying existing or potential hazards associated with jobs / tasks that they are performing.

- Office Staff

- Repetitive movements such as typing
- Attempting to lift items that are too heavy
- Poorly designed and/or set-up workstation
- Shift work
- Poor lighting
- Poor air quality

- Electricians
 - Electrical Shock and Burns
 - Working at height
 - Noise
 - Fire
 - Hazardous Products
 - Fumes
 - Moulds, Fungi
 - Confined Space

- Custodians
 - Slippery conditions
 - Falls
 - Exposure to heat
 - Objects falling on employees
 - Exposure to hazardous materials / chemicals
 - Malfunctioning machinery
 - Physical exertion
 - Fumes
 - Shift Work
 - Needle Stick

- Carpenters
 - Dust
 - Sharp Objects
 - Electrical Shock
 - Falls from Height
 - Vibration
 - Fumes
 - Asbestos
 - Lead
 - Repetitive Motion
 - Noise

- Plumbers
 - Confined Space
 - Hazardous Chemicals
 - Radiation
 - Flammable / Combustible Materials

- Fumes
- Hot Objects
- Human Waste
- Heavy Lifting
- Awkward Positions
- Extreme Heat

- Welders
 - Compressed Gases
 - Electrical Shock
 - Burns
 - Fire
 - Awkward Positions
 - Fumes
 - Bright Light
 - Noise
 - Hazards Coatings
 - Heat

- HVAC
 - Dust Rodent Droppings
 - Asbestos
 - Sharp Objects
 - Working at heights
 - Hazardous Products
 - Heavy Objects

- Painters
 - Working at Height
 - Hazardous Chemicals
 - Sharp Objects
 - Fumes
 - Fire
 - Heavy Objects

8.2.4 Workplace Factors

Another helpful way of identifying hazards is to consider the workplace factors that exist and the impact they will have on the safety of yourself and others. Do these workplace factors constitute a hazard?

Workplace factors are:

People Factors

Consider the steps taken, or not taken, by people as they perform their job. Are their skills and abilities sufficient for the job? Will there be adequate supervision at the workplace? Are any of the employees that will be working on the job sick, taking prescription drugs, emotionally stressed, etc.?

Equipment and Tool Factors

Consider all of the tools, equipment and machinery involved in the job. Have all energy sources been isolated to prevent to unexpected release of energy. Any of these things that give off heat, operate under pressure, are powered by electricity, give off high pressure steam or emit radiation, etc. are potential hazards.

Material Factors

Consider the materials to be used on a job; hazardous products, flammable or combustible products, toxic substances, recycled materials; these are all hazards or potential hazards.

Process Factors

Process factors relate to the performance design of a given job, in other words bringing the materials, people, skillful use of tools and equipment, adequate supervision together to produce a finished product or job. Deviations from the correct / defined process can lead to failure of the overall job.

Environmental Factors

These factors are the conditions that exist at the workplace. (Working at height, extreme heat or cold, excessive noise, poor housekeeping, etc. are environmental factors.) Environmental factors can also be things like snow, ice, rain, high wind, and lightning.

8.2.5 Hazard Identification Forms

A number of forms have been developed to enable Facilities Management employees to create written records of their hazard identification and assessment activities. The following three types of forms are intended for broad use in the workplace.

- Comprehensive Hazard Inventories
- Job or Project Hazard Assessment Worksheet and,
- Job Hazard Analysis Worksheet

- Job Risk Assessment Worksheet

Additional forms such as the Confined Space Hazard Identification and Assessment Form and the Fall Protection Hazard Identification and Assessment Form have been developed to meet the specific needs of a particular element of the Facilities Management Occupational Health and Safety Program

8.2.6 Comprehensive Hazard Inventories

The purpose of the comprehensive hazard inventories is to create a record of the tools, equipment, machinery, hazardous products and jobs that exist in the many FM workplaces. Prior to using any of the items listed or performing any of the jobs that are listed the hazards associated with each item must be identified.

This process involves completing each of the following inventories:

- Tool and Equipment Inventory
- Hazardous Products Inventory
- Job Inventory

These inventories provide the Department with a written record of all existing tools and equipment, hazardous products, and, the jobs performed in each our Shops and Zones.

Once comprehensive hazard assessment inventories have been completed the next step involves identifying the hazards associated with the items recorded on each list.

Inventories are to be undated when old or used items are removed from use or when new items are acquired.

Each service must complete a review of its comprehensive inventories every two years or more often if necessary. The review must include a comparison of the information recorded on each inventory with the jobs, tools, equipment and products that exist in the workplace at the time of the review. Any new items identified by the review must be added to the corresponding inventory and, if appropriate, to the Job Inventory and Risk Assessment Form so that risk ranking can be determined.

8.2.7 Job or Project Hazard Assessment Worksheet

Prior to beginning a new project or certain jobs, depending on their size and complexity, a Job or Project Hazard Assessment form must be completed by the appropriate Manager(s), Supervisor(s) and Employee(s) as part of the planning process.

If Project Management employees are involved in planning for the project they should contribute to this process as well to ensure input from all parties. The purpose of this assessment is to identify any existing or potential hazardous conditions or situations that are unique to individual projects and the project environment prior to the start of work.

A copy of the original assessment form should be kept at the workplace and reviewed daily to ensure that conditions have not changed over night. Previously recorded information is to be modified to reflect any changes that may have occurred.

List all of the existing or potential hazards that you can identify. The following are examples of some of the things to look for and consider when performing a site / project assessment.

- The site environment, including terrain, buried cables or water lines, overhead cables, unstable soil conditions, the presence of members, or other people, at or near the work site, etc.
- Will the project require an employee to work alone?
- Can hazards develop as a result of changing environmental conditions such as rain, high winds, abnormally hot or cold temperatures, etc
- What tools, equipment and machinery will be used and will they create on site hazards in addition to those inherent in the operation of the equipment or machinery?
- Have any changes occurred that introduce a new or potential hazard in the workplace or could increase the degree of severity associated with an existing hazard.
- Will other Services or outside contractors be involved? If so what special precautions are required to protect the health and safety of everyone at the work site?

An initial “table top” site / project hazard assessment can be done by having a discussion about the project with the people involved. Consideration can be given to tools and equipment to be used, hazardous products, information already known about the work site, etc. Such assessments must to be completed by “ground truthing” at the workplace before work is started.

8.2.8 Job Hazard Analysis Worksheet

Job hazard analysis is the systematic, in depth, examination of a job for the purpose of identifying the hazards associated with each step of the job and determining what specific control measures need to be implemented to control those hazards. The Job

Hazard Analysis Worksheet can be used to help list the steps in a job, the hazards associated with each step and the control measures required to deal with each hazard.

The Job Hazard Analysis (JHA) Worksheet should be used when ever it is necessary to identify the hazards associated with the steps required to perform a particular job. The Worksheet must be completed for any job listed on the Job Risk Assessment Worksheet with a high risk ranking. (See Section 10.3.1)

The benefit of preparing a job hazard analysis for a specific job is that the supervisor and employee are able to analyze each key step required to perform the job and identify the hazards associated with each of the steps. This makes the job of selecting appropriate control measures much easier.

Remember: Some control measures may already be in place, if so, record them on the job hazard analysis form.

In addition to the requirements specified above, supervisors should also consider performing a job hazard analysis if any of the following conditions exist:

- When there is an increase in the number of incidents or accidents or when there is an increase in the severity of accidents associated with a particular job.
- When a new job is introduced to the work place, especially if it includes the introduction of new equipment.
- Any job that requires the performance of numerous detailed tasks.
- A job that involves two or more employees performing inter-related tasks at the same time.
- Any job that is performed on an infrequent or seasonal basis.
- As part of planning for, or, making changes to an existing job or project to ensure new hazards won't be introduced.
- When a job is frequently being interrupted or stopped due to operational or technical problems.
- When an employee will be working alone and away from immediate help if something goes wrong.
- Jobs where there is a potential for violence in the workplace.
- When there are changes to existing legislation or new legislation is introduced.
- Program review indicates the need for a job hazard analysis.

8.2.9 Performing a Job Hazard Analysis

Supervisors are to ensure that employees help complete each job hazard analysis. Employees are an incredible source of information about how best to perform their jobs so they must be a part of developing safety measures.

Job hazard analysis is to be conducted using the following basic steps:

- Choosing the job to be analyzed.
- Break the job down into an orderly series of basic steps.
- Identify any potential or real hazards associated with each step.
- Determining what control measures are required to minimize or eliminate each of the identified hazards. (Remember, some control measures may already be in place, if so record them on the JHA form.)

Once a job hazard analysis is completed supervisors will be responsible for:

- Communicating information about identified hazards and their control measures to the appropriate employees.
- Monitoring control measures to ensure they are adequate and properly implemented.
- Reviewing each job hazard analysis on a regular basis to assess whether any additional changes are required.

The procedural steps to be used by supervisors and employees when they are involved in performing a job hazard analysis are:

- Have everyone that is participating in the job hazard analysis meet at the location where the assessment is to take place.
- Make sure you have JHA forms, pencils, a camera, scrap paper etc.
- Include input from the supervisor(s) and any skilled employee(s) that perform the job. Encourage these people to share as much information as possible about hazards and any other problems they have encountered when performing the job.
- Make sure that you assess every step required to perform the job.
- People, Environment, Materials, Equipment – When looking for hazards consider these four things both individually and in inter-action with one another.
- Take lots of notes.
- Constantly ask yourself; “What if ?”

- Review your findings.

All areas of the Job Hazard Analysis Worksheet must be completed; the three columns labeled Sequence of Steps, Potential Hazards and Control Measures will contain the key information.

Sequence of Steps – Every job consists of a series of key steps or individual actions that lead to the completion of the total job. In this column record the individual steps required to complete each job being assessed in the order in which they are performed.

Potential Hazards – This column is used for recording the actual or potential hazards (falling, having something fall on you, falling or shifting objects, hazardous chemicals, potential for fire, excessive noise, gases, fumes, etc.) associated with each step required to perform the job.

Control Measures – Use this column to list the control measures necessary to minimize or eliminate the hazards associated with each step required to do the job.

8.3 Assessing the Risks

Once hazards have been identified the next critical step is to determine the level of risk associated with each hazard. Determining the level of risk involves looking at:

- **Frequency** or how often a job is done which is affected by how many people are doing the job within a specified time frame.
- **Probability** or the likelihood of an accident occurring.
- **Severity** or how bad an injury or damage will be if an accident occurs.

8.3.1 Job Risk Assessment Worksheet

The Job Risk Assessment Worksheet has been created to help managers, supervisors and employees determine the level of risk associated with various jobs.

The main objective of the Job Risk Assessment Worksheet is to prioritize jobs based on their risk ranking and to make some basic initial recommendations about required control measures. Assigning a numerical value to the risk associated with each job immediately identifies whether jobs are high, medium or low risk. Jobs that fall in the high risk category are critical jobs and require further immediate analyzes using the Job Hazard Analysis Form.

Keep things simple when recording jobs or tasks on the worksheet. Operating a chain saw is an example of the sort of thing to be listed. Do not list something like building a house; this sort of activity needs to be broken down into the many separate tasks involved in building a house.

Supervisors should involve their employees in developing, maintain and regularly updating these risk assessments so that they reflect any job changes that take place in the workplace. Completed assessments should be reviewed with the JOHS committee

8.3.2 Procedure for Completing the Job Risk Assessment Worksheet

Each Shop is to complete this Job Risk Assessment Worksheet as follows:

Column 1

Supervisors are to work with their employees to list the various jobs that they perform in this column. (Examples: operating mowing equipment, pruning shrubs or trees, operating a table saw, operating a 5 ton truck, etc.). If new jobs are introduced to the workplace they must be added to the inventory.

Column 2

Opposite each job list as many hazards as you can think of that are associated with the job. Remember to consider both safety hazards and health hazards.

Column 3

Use the three variables found in Column 3 to determine the level of risk associated with each hazard.

- **Frequency** relates to how often an exposure occurs. For example:
 - Is this job performed a few times each year?
 - Is this job performed one or more times every month?
 - Is this job performed one or more times every week?
 - Is this job performed one or more times every day?

Frequency is also affected by the number of people that are doing the job. In other words, an increase in frequency can be due to one person being exposed multiple times or multiple people being exposed one or more times.

- **Probability** is the likelihood of an accident involving injury or property damage occurring while a job is being done. There are three things to be considered when assessing probability:

- How inherently dangerous is the job, even when control measures have been put in place?
- How difficult is this job? Is the performance of this job prone to problems other than the known hazards?
- What is the degree of complexity of the job? Are there numerous steps? Must they be done in a specific order?

The above three points should be considered jointly when assessing how probable it is that something can go wrong as a result of the job being performed.

- **Severity** assesses the degree of injury or damage that may occur as a result of an accident.
 - Low – an event occurs and no first aid or medical treatment is required, property damage is insignificant.
 - Minor – a non disabling injury; on site first aid is provided and the employee requires no time off work. If the event involves damage to equipment or property the cost is under \$1000.00 (Example amount).
 - Moderate – usually a disabling injury; medical treatment is provided and the employee requires time off from work beyond the day of the event. Damage to property or equipment is valued between \$1001.00 and \$5,000.00 (Example amounts).
 - High – this type of injury involves the loss of a limb or a body part or ends in a fatality. Damage to equipment or property is in excess of \$5,000.00 (Example amount).

Column 4

Once a value has been calculated for each of the three risk factors they should be added together and the total entered in this column. The higher the total, the greater the level of risk associated with the hazard. As the risk ranking of a job increases so does the necessity to take action in order to eliminate or minimize the hazard.

Any task / job with a risk ranking of 9 or higher is to be considered a critical task and must be further assessed by doing a job hazard analysis.

Column 5

Depending on the nature and severity of the hazard involved, one or more of the control measures found in this column must be checked to indicate what type of control measures will be implemented to deal with the hazard.

Remember items checked under Column 5 are the broad categories of control measures; it will be necessary to select specific control measures within each category to ensure the hazard is adequately controlled. (Example: Specific control measures in

the administration category would be safe work practices, safe job procedures, proper purchasing practices, training, etc)

The control measures selected must:

- adequately control the hazard
- not create other hazards; and,
- ensure that employees are able to do their jobs in a safe, healthy and comfortable working environment.

The final decision about what control measures to implement should be the result of consultation between supervisors, employees and will sometimes involve the OHS committee.

Appropriate control measures are to be identified for each hazard regardless of the level of risk associated with the hazard.

8.4 Deciding on Control Measures

Once hazards have been identified and assessed, appropriate control measures must be implemented so that the hazard is either eliminated or its existence constitutes minimal or virtually no risk to employees or anyone else in the workplace.

When a hazard is identified appropriate control measures must be developed and implemented. There are no exceptions to this requirement.

8.4.1 Hierarchy of Control Measures

The elimination or minimization of a hazard is not an arbitrary process. All hazards are to be dealt with by implementing one or more of the hazard control measures in the following hierarchy of controls. The five control measures are listed in the order in which they must be implemented; from the most effective (Number 1) to the least effective (Number 5).

1. Elimination

The elimination of a hazard is the most effective step to take in protecting employees.

Elimination involves things like reducing temperature, pressure, speed, changing how something is done to eliminate noise, automating a process, performing a job at

a different location if possible, or, not using a particular piece of equipment, type of material or process in the workplace at all.

If elimination is not successful or practical consider the next control measure.

2. Substitution

Substitution can be used to reduce the impact of a hazard by replacing a more hazardous item, or way of doing something, with something less hazardous.

If substitution is not successful or practical try the next control measure.

3. Engineering Controls

Engineering controls involve using exhaust ventilation systems, separating the employee from the problem by enclosing the hazard, using machine guards, redesigning the equipment being used, installing sound proofing, platforms, scaffolding, guardrails, etc.

If engineering controls are not successful or practical try the next control measure.

4. Administrative Controls

Examples of some administrative controls are as follows:

- Hazard and risk assessments
- Job Hazard Analysis
- Safe Work Procedures
- Safe Work Practices
- Training and supervision
- Job Rotations
- Programs defining proper housekeeping, repair and maintenance procedures
- Good hygiene practices
- Hazard communication and training
- Equipment inspections

- Implementing purchasing practices that place great emphasis on health and safety considerations
- Purchasing Procedures

Supervisors must always consider using elimination, the most effective hazard control measure, as the first step in dealing with any hazard. If elimination of a hazard is not possible substitution is the next step to be considered and so on until an appropriate and effective control measure, or combination of measures, has been selected to deal with the hazard.

5. Use of Personal Protective Equipment

Only after every effort has been made to deal with a hazard by using one or more of the above options should consideration be given to the use of personal protective equipment as the final barrier between the hazard and the employee.

In many cases it may be necessary to consider the use of PPE in conjunction with one or more of the other control measures to ensure an employees safety.

When worn and used properly, PPE will contribute to overall employee protection.

8.5 Implementation of Control Measures

Once all of the hazards associated with a particular worksite and the work to be performed have been identified and appropriate control measures have been developed to deal with all of the hazards the control measures are to be documented in writing and once they have been documented they must be implemented immediately.

The steps in the implementation process are as follows:

- Confirm that the control measures that have been chosen are sufficient to protect against the identified hazards.
- Document in writing the necessary steps to implement all of the required control measures.
- Communicate information about hazards and control measures to all affected employees.
- Implement control measures.
- Supervisors and employees must ensure that no new hazards have been introduced to the worksite as a result of implementing the control measures.
- Supervisors must observe all employees to confirm that the control measures are being properly implemented.
- If necessary, supervisors must help employee's correct things that they are not doing properly.
- Monitor ongoing job activities and any changes that may require attention. (Examples: Unexpected developments as a result of work being performed, hazards introduced by new trades or contractors starting work at the same site, etc.)

8.6 Communicating Information about Hazards

Supervisors are responsible for communicating with their employees about hazards that have been identified in a workplace and all of the control measures that must be implemented to deal with those hazards.

In order for the hazard identification, assessment and control process to be successful supervisors must maintain an open line of communication, about this subject, with their at all times.

Supervisors will be held responsible for informing employees about any new job hazard analyses, safe work practices or safe job procedures or changes to existing ones to ensure employees are always following the most up to date hazard control measures.

Tool Box Talks are an excellent way of communicating this type of information.

8.7 Monitoring of Control Measures

Any control measures that have been implemented must be monitored on a regular basis to ensure their effectiveness. Monitoring should be done as part of regular workplace inspections, day to day observations by a supervisor, reviewing incident investigation reports, reports of hazards and as part of annual program reviews.

The following questions should be considered when assessing the effectiveness of a control measure:

- Has the control measure adequately dealt with the problem?
- Are any hazards apparent as a result of having implemented the control measure(s).
- Are employees exposed to any previously non-existent problems / hazards?
- If a hazard (or hazards) was introduced as a result of the control measure being implemented has appropriate action been taken to control the new hazard(s)?
- Have any incidents or accidents occurred as a result of the new control measure being implemented?
- Are any new / additional control measures required? If so, develop, communicate with employees and implement immediately.

8.8 Additional Sources of Information for Identifying Workplace Hazards

The following are additional sources of information that can help to identify both real and potential hazards in our workplace:

- Workplace safety audits
- Incident / Accident Investigation Reports and Workers Compensation Board claims
- Workplace Inspection Reports
- First Aid Records
- Employee reports of hazards or concerns
- Minutes of the JOHS Committee
- Tool and equipment inspection checklists
- Material Safety Data Sheets
- Consulting with and regular observation of staff.
- Manufacturers equipment manuals
- Equipment maintenance records
- Employee experiences
- OHS Act and regulations
- Occupational Health and Safety Websites
- National organizations, trade associations, trade unions

8.9 Safe Job Procedures and Safe Work Practices

Safe job procedures and safe work practices are two extremely important administrative control measures that play a critical role in ensuring the health and safety of employees.

- Safe job procedures provide extremely valuable information about the orderly and safe execution of jobs.
- Safe work practices provide specific information about how to perform jobs safely and efficiently, in other words the “Do’s” and “Don’ts” of working safely.
- Both are an excellent source of information for providing employee training.

To help ensure their ongoing and most effective use additional information has provided to help managers, supervisors and employee make changes to existing safe job procedures and safe work practices and create new ones when they are required.

8.9.1 Safe Job Procedures

Safe job procedures are to be used to summarize the information that is compiled as a result of conducting a job hazard analysis.

Safe job procedures can also be used to distill the information in manufacturer's user manual into a more user friendly format.

A safe job procedure provides a clear, step by step, written description of how to perform a job safely and efficiently from start to finish.

Supervisors are to consider the following criteria when deciding whether a job requires a safe job procedure:

- Is this a critical job / task such as using a complex piece of equipment to perform a job, is lock out / tag out of a piece of equipment involved, working alone, trenching, working in proximity to overhead power lines or other utilities?
- Is this a job with a record of frequent accidents or near misses?
- Is this a job where serious accidents have already occurred?
- Is this a job that has the potential to cause serious injury, illness or damage to property even if such events have not occurred in the past?
- Does the job involve two or more employees performing tasks simultaneously?
- Is this a job that is performed infrequently and as such everyone involved would benefit from a standardized process being defined?
- Are there any new regulations or standards that affect how the job is to be done?
- Has there been a change in the equipment or materials used in the performance of the job?

Supervisors are responsible for reviewing safe job procedures with their employees on an annual basis to ensure their effectiveness and efficiency. If a set of procedures can be improved at any time during the year and efficiencies and benefits realized, changes are to be made and implemented immediately.

The broad steps to be followed when preparing a new safe job procedure, or making changes / improvements to an existing one, are as follows:

- Review any existing job hazard analysis or prepare a new JHA if necessary. Acquire information about the job from other sources.
- Observe the job being performed by experienced employees. Record each of the steps performed in doing the job safely.
- Draw on the experience of employees that have performed this job / task in the past.
- Make any changes that may be required to the sequence of steps. Discuss changes with employees doing the job.
- Have the new, or corrected, safe job procedure reviewed by the appropriate shop supervisor and employees and by the OHS Committee.
- Use any input to make further updates /improvements.
- Obtain final approval from the OHS Committee and the shop supervisor.
- Make sure that a copy of the completed safe job procedure is placed in the health and safety manual.
- Ensure that the contents of the safe job procedure are communicated to the employees that perform the job.

Note: As part of any approval process it may be helpful to have a new safe job procedure tested at a location where the job will be performed to ensure that it is accurate and that no unforeseen problems or hazards exist in any of the newly defined steps.

8.9.2 Safe Work Practices

Safe work practices are a listing of the “Do’s” and “Don’ts” associated with the safe use of tools, equipment, machinery, hazardous products and/or the safe performance of tasks.

Safe work practices are referenced in safe job procedures for the tools and equipment that must be used to complete a specific job. Regardless of where or when a tool or piece of equipment is used its safe work practices remain the same; it is specific to the tool, machine or piece of equipment not the job.

Information for inclusion in safe work practices can be obtained by referring to the following sources:

- equipment owner / operator manuals,

- industry standards and/or best practices,
- OHS regulations
- employee experience
- the World Wide Web

Supervisors are to do an annual review of safe work practices with their employees. If changes are required they are to be recorded in writing and a new safe work practice is to be produced for the job, tool or piece of equipment involved.

The reasons for developing new safe work practices or revising an existing one are:

- as a result of an employee making a recommendation to their supervisor to deal with a hazard.
- the annual review process indicates a need for changes to existing safe work practices or development of new safe work practices .
- a new piece of equipment or toll is brought into the workplace.
- Preparation of a JHA indicates the need

The process for developing a new safe work practice, or making changes / improvements to an existing one, is as follows:

- Collect relevant information from equipment manuals being used, industry standards, health and safety regulations, company experience, Web searches etc.
- Observe and speak with experienced employees about the appropriate safety precautions to be taken.
- Obtain input from employee operate the equipment or perform the job.
- Record all appropriate information on the safe work practice form.
- List the hazards associated with the job and the personal protective equipment required.
- Have the completed draft copy of the new, or corrected, SWP reviewed by the appropriate supervisor, employees and the OHS Committee.
- Use any input to make further improvements.
- Obtain final approval from OHS Committee and the supervisor.

- Ensure that a copy of each new or revised safe work practice is placed in the service / shop health and safety manual.
- Ensure that the information contained in the SWP is communicated to employees.

Reminder: Development of job, equipment or hazardous product inventories, job hazard analyses, safe job procedures and safe work practices is intended to be a co-operative effort involving the OHS committee, supervisors and employees. This approach incorporates a wide base of experience into the process and promotes ownership and acceptance of our OHS program.

9.0 WORKPLACE SAFETY INSPECTIONS

Section 28(2)(e)(ii) of the Nova Scotia Occupational Health and Safety Act specifies that the employers written occupational health and safety program shall include, as part of its hazard identification system, procedures and schedules for regular inspections of the workplace. Accordingly inspections must be carried out on a regular basis at all Facilities Management workplaces.

The Facilities Management Joint Occupational Health and Safety Committee shall be responsible for designating the frequency of workplace inspections. The Committee shall establish a schedule for a minimum number of regular inspections to be performed during a given calendar year. The Committee shall increase the frequency of inspections based on the hazardous conditions or issues that exist at any given time.

The frequency of inspections is to be set by the FM OHS committee at its first meeting each year. The scope of inspections shall be such that an entire workplace will be inspected each time or workplaces will be divided into smaller areas with a different area being inspected each month so that the whole workplace will be inspected once a year.

The minimum objectives of every workplace inspection will be to:

- identify any conditions and/or acts that are in non-compliance with the Act, the regulations.
- Identify non-compliance with the requirements of this OHS program and the Dalhousie EHS program.
- identify any real or potential hazards associated with Dalhousie buildings and property, the work environment, tools and equipment.
- identify whether safe procedures and practices are being followed by employees.
- examine whether previously implemented safety controls are achieving the desired result.
- make recommendations when new or additional corrective measures are required.

9.1 Types of Inspections

The Dalhousie EHS Program requires that the following three types of inspections are performed:

- Facilities Management Inspections or Workplace Inspections
- Fire Safety Inspections; and,

- Inspections of Higher Hazard or Highly Specialized Areas

Depending on the circumstances one of the following two methods will be utilized at all Facilities Management workplaces when any of these types of inspections are performed:

- formal, or, regular planned inspections; and,
- informal inspections such as:
 - spot inspections carried out by supervisors as part of their everyday activities
 - new equipment inspections that are carried out prior to a piece of equipment being used
 - critical equipment inspections which will involve a planned regular examination of equipment, tools or machinery that have a high risk of serious accidents.

Any corrective actions necessary to deal with hazards that are identified during an inspection will be reported using the forms provided.

Once corrective measures have been implemented, department supervisors must monitor the effectiveness of such measures to ensure their adequacy.

9.1.1 Formal Inspections

These inspections are to be considered a top priority. Dates for formal workplace inspections should be set for a twelve (12) month period to ensure that every person involved in the inspection have ample time to include the dates in their schedules.

Additional inspections may also be carried out for a particular reason such as an inspection of tools and / or equipment.

Safety inspections provide the inspection team with an opportunity to listen to the concerns of employees, gain further understanding of jobs and tasks, determine the underlying causes of hazards, monitor hazard controls and recommend new or additional corrective action when and if required.

Each inspection must consider and evaluate the following workplace factors:

- the work environment – noise, lighting, temperature, ventilation, vibration
- equipment, tools and machinery – look for deterioration due to wear, impact, heat stress, corrosion, misuse, are guards in place, air quality, etc.

- buildings and other structures – assess internal and external condition, entrances and exits, stairs, hallways, lunch rooms, bathrooms, storage rooms and other similar areas.
- property – consider whether any unsafe conditions exist on the campus grounds that need to be addressed
- materials – are cleaning products or other hazardous products stored, labeled and used properly, etc.
- process – the interaction of employees with other factors as they perform their jobs.
- people – assess whether employees are following safe work practices and safe job procedures as they do their jobs.

Things or actions to consider when looking for poor work practices are:

- Improper use of tools and equipment.
- Removal of guards and other protective devices or adjusting them so as to negate their purpose.
- Using equipment and tools that are defective.
- Improper use, maintenance or storage of personal protective equipment.
- Improperly loading of trays, lifts, trolleys so loads are not balanced properly.
- Handling or lifting materials in an unsafe fashion.
- Employees not using good personal hygiene.
- Employees using tools or equipment prior to receiving proper training.

9.1.2 Informal Inspections

Informal inspections should be performed by supervisors on an ongoing basis as they go about their daily jobs. Likewise, employees should always be aware of hazardous situations and/or conditions as they perform their daily work and immediately report them to their supervisor.

Workplace safety inspections are not intended to be a substitute for supervisors and employees being aware on a daily or shift basis of their surroundings and any hazards that may exist.

Any concerns that are raised or hazards that are reported by employees are to be taken seriously by their supervisor. They are to be reviewed by the appropriate supervisor and corrective measures are to be developed and implemented as quickly as possible. If a number of hazards have been identified or a number of concerns have been raised, each item should be dealt with based on its risk priority or its degree of non-compliance.

9.2 Conducting Formal Workplace Inspections

Formal Inspections are to be carried out by a team that includes the supervisor of the shop or area being inspected, a competent department employee familiar with the work performed in the area being inspected and a member of the OHS committee.

The employees and committee members that make up the inspection team should change from time to time to provide as many employees as possible with experience in performing workplace inspections.

Shop supervisors are to be notified in advance of an inspection so they can be available and ensure that employees are available, as required, to participate in the work place inspection.

On the day scheduled for a workplace inspection, inspection team members must ensure they have allocated sufficient time in their work day to do the inspection without rushing.

Since not all members of an inspection team will necessarily be familiar with the department being inspected the following information should be made available to the inspection team by the shop supervisor:

- floor plans for the work area to be inspected (If they exist.)
- plans showing the layout of equipment within each workplace. (If they exist.)
- information about activities performed in the area
- information about any hazards that might be encountered
- where storage areas are located
- the location of all exits, and;
- any other information that will help ensure the health and safety of team members
- what personal protective equipment will be required.

Prior to each inspection the inspection team is to obtain any of the following information or materials necessary to ensure a thorough and successful inspection.

Information

- Manufacturers' manuals for any equipment that is to be inspected.
- Lists of any hazardous materials stored in the workplace.
- A copy of the most recent Workplace Inspection Checklist.
- A copy of the most recent Workplace Inspection Report for reference and discussion prior to and during the inspection.
- Recent accident / incident reports for the area being inspected.
- Workplace Hazard Reports
- Equipment and tool Checklists
- Vehicle Checklists
- Employee Report of a Hazard / Concern or Refusal to Work

Materials Required for a Workplace Inspection

- A blank copy of the Workplace Inspection Checklist
- Pencils and paper
- Equipment inventories for each workplace
- A measuring tape
- A camera (not always necessary but a good thing to have)
- The required Personal Protective Equipment (PPE) for the workplace or equipment to be inspected. (If the proper PPE is not available, do not enter the area. Record the lack of PPE as a deficiency on the inspection checklist. Inspect the area when the proper PPE becomes available.)

Whenever it is necessary to ask questions during an inspection try to do so in a way that creates the least amount of disruption to work activities.

All areas of the workplace are to be inspected including work shops, parking lots, driveways and roadways, office areas, employee locker and lunch rooms, canteens, hallways and stairways and storage rooms.

Remember: It is not the job of the inspection team to lay blame for any hazards that may exist.

9.3 The Workplace Safety Inspection Forms

Workplace Inspection Checklist

The Workplace Inspection Checklist is a reference guide to be used during all regular formal workplace inspections to ensure consistency. The checklist provides a series of generalized questions about various elements of the workplace, and, equipment used in the workplace.

Not all questions will be applicable to every part of the workplace. For each relevant question a simple Yes or No answer is required. Whenever there is a No response to a question the inspection team should record comments about the location and nature of the problem or hazard and any recommendations they would like to suggest as corrective action. If the space provided for comments is not sufficient use the back of the form and / or additional sheets of paper.

The recorded information should be an accurate account of the inspection team's observations during an inspection.

Workplace Inspection Checklist Summary

The Workplace Inspection Checklist Summary is used to summarize the information recorded on the Workplace Inspection Checklist in an easily used format. This form is to be completed by the inspection team immediately after each inspection. The body of the form is divided into two categories, "Observations" and "Corrective Actions".

The Observations part of this form is for the inspection team to:

- list items or hazards that are observed.
- record the location of the item or hazard.
- assign each item or hazard a priority rating based on information provided on the back of the form and indicate any immediate steps that are required and how quickly corrective action must be taken.
- indicate whether items or hazards are new
- indicate whether items or hazards are repeats or are being carried forward.
- indicate applicable sections of the Act or regulations that may have been contravened.

The Corrective Action part of the form is to be used by the inspection team to:

- list the name of the department supervisor responsible for ensuring corrective action is taken.

- indicate whether the Workplace Hazard – Corrective Action Report has been completed.
- propose a completion date by which time corrective action must be completed.
- record the actual date on which corrective action was completed.

Once completed the Workplace Inspection Checklist Summary is to be used to prepare a Workplace Hazard – Corrective Action Report for the supervisor of each department where hazards or non-compliance issues were noted.

Once the required Workplace Hazard – Corrective Action Reports have been prepared the original Workplace Inspection Summary Report is to be filed as part of the OHS committee records and a copy is to be sent to the responsible manager.

Workplace Hazard – Corrective Action Report

Each supervisor whose name appears on the Workplace Inspection Checklist Summary must receive a Workplace Hazard – Corrective Action Report for each of the items or hazards in their area of responsibility that have been noted as requiring corrective action.

The form is to be used by the supervisor to record their recommendations for corrective action and to make complete notes about all corrective action taken.

If corrective action is deferred beyond the proposed completion date, an explanation of why must be provided on the Corrective Action Report and a copy sent to the OHS Committee and the appropriate manager.

Once the recommended corrective action has been completed the responsible supervisor is to sign the Workplace Hazard – Corrective Action Report and send a copy of the completed form to the appropriate manager for sign-off. Once the manager has signed-off the form is to be forwarded to the OHS Committee for retention in the committee files.

10.0 CONTRACTOR/CONSTRUCTOR HEALTH AND SAFETY REQUIREMENTS

Facilities Management frequently hires contractors to undertake various jobs and construction projects that vary considerably in size and complexity.

Contract arrangements should be in writing and specify who will be the constructor on the project and responsible for complying with all legal duties and obligations of that position, including all safety requirements.

10.1 Legislative Requirements

Facilities Management must require contractors and constructors to meet and / or exceed the requirements of the Nova Scotia Occupational Health and Safety Act, all applicable regulations, Codes of Practice, CSA or other standards and their own safety program.

10.2 Additional Requirements

The management of contractor safety by Facilities Management has the following six key components. Each component is designed to meet a specific requirement, and has actions and documentation that demonstrates completion:

10.2.1 Contractor / Vendor Evaluation Prior to Award

Requirements	Evaluate potential vendors for compliance with safety requirements.
Action	Contractor provides a valid and current WCB letter of good standing and have COR (Safety Certified) accreditation. Verify Contractor safety history with Dalhousie is acceptable.
Documentation	WCB Letter of Good Standing COR (Safety Certified) Accreditation

10.2.2 Dalhousie Contractor Safety Policy

Requirements	Define and Document the roles and responsibilities for safety management at Dalhousie.
Action	Contractor reads and signs Contractor Safety Policy at Construction Startup Meeting
Documentation	Contractor Safety Policy - Signed

10.2.3 Knowledge of Workplace and its Hazards

Requirements	Provide knowledge of workplace and hazards to Contractors.
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Action	Deliver Project Hazard Assessment Worksheet to Contractor including a project specific hazardous materials report by an Environmental Consultant, if applicable.
Documentation	Project Hazard Assessment Worksheet Hazardous Materials Report (when applicable).

10.2.4 Contractor Site-Specific Safety Plan

Requirements	Ensure Contractor has assembled a site specific safety plan.
Action	Review Contractor Site Specific Safety Plan (do not approve)
Documentation	Contractor Site Specific Safety Plan

10.2.5 Construction Monitoring

Requirements	Monitor Contractor's activities during construction.
Action	Regular Construction Site Visits and Safety Audits
Documentation	Safety Audit Reports (EHSO or other safety expert to review selected projects). Site Safety Review Checklist(s). Quantity of reviews shall be relevant to the duration of the project, the types of hazards, and the risk identified in the safety plan.

10.2.6 Continuous Communication

Requirements	Maintain constant communication with Contractor.
Action	Attend Regular Site Meeting where Safety is always the first agenda item.
Documentation	Site Meeting Minutes Tool Box Minutes

10.3 Intervention in the Case of a Hazard or Non-Compliance

Dalhousie University, Department of Facilities Management reserves the right to intervene if a contractor, constructor, sub-contractor or any of their employees fails to comply with the OHS Act or any relevant OHS regulations and by failing to do so is jeopardizing the health or safety Dalhousie University employees as well as any other persons at or near the workplace.

If non-compliance is observed it will be immediately reported by Facilities Management to the contractor's OHS contact. The contractor's OHS contact will immediately investigate the situation and report to the contractor and Facilities Management what correctives measures will be undertaken to deal with the issue.

If the contractor or their employee(s) continues to work in an unsafe manner the matter may be reported to the Director of the Occupational Health and Safety Division. Facilities Management will create Incident Reports that document any serious safety incidents involving contractors.

11.0 COMMUNICATION OF WORKPLACE HEALTH AND SAFETY INFORMATION

The success of this program will depend in great part upon the level of communication that exists, on a daily basis, between senior management, supervisors, employees and the Facilities Management OHS Committee.

The importance of communication cannot be stressed enough. The Act makes constant reference to the “requirement” for communication. The following words and phrases are examples of some of the many references throughout the Act that indicate the need for communication in some form or another:

- “provide such information”
- “are made familiar with”
- “consult”
- “communication between”
- “consult and co-operate with”
- “advising”
- “respond in writing”

All employees, regardless of their position are expected to consult with one another, their supervisor and with the FM OHS Committee in order to deal with any health and safety issues that exist in the workplace or may arise in the course of performing their jobs. The forms of communication that will help create a well informed workforce are:

- consultation, including discussion; and,
- the posting and/or distribution / sharing of written information.
- ongoing verbal communication. Any information provided verbally should when ever possible be provided in writing.

For either of these forms of communication to be useful tools in the implementation and advancement of this OHS program, they must be effective in their delivery. Information must be communicated in a clear, comprehensive, interesting way that is relevant to the issue involved or the program as a whole.

11.1 Communication through Consultation

The vice president, directors, managers, supervisors, working forepersons must consult with employees either directly or through FM Occupational Health and Safety Committee about issues that relate to the health and safety of their employees, including:

- establishing and maintaining the Facilities Management OHS policy and program
- information about mitigation of hazards in the workplace.
- any change(s) to things such as procedures, safe work practices or elements of the OHS program that could have a substantial affect on the health and safety of employees.
- contracting for the services of competent people to provide training, workplace hazard assessments, maintenance services, assistance with program development, program auditors or to satisfy other OHS requirements.
- changes to existing equipment or the introduction of new equipment
- personal protective equipment and devices
- complaints about OHS related issues
- workplace inspections and accident investigations

11.2 Distribution of Information

Critical to the ongoing development of our OHS program is the sharing, on a day-to-day basis, of health and safety related information. Supervisors are required to communicate health and safety related information to their employees as part of their day-to-day activities.

The Act requires the employer or management to provide / communicate the following information to employees:

- Information to Be Posted
 - The name and workplace phone number of the Dalhousie EHS Committee members, the FM OHS Committee members and their alternates
 - A current copy of the Occupational health and Safety Act
 - The current telephone number for the Occupational Health and Safety Division of the Department of Labour and Workforce Development to enable the reporting of health or safety concerns.
 - A copy of the Facilities Management OHS Policy

- Any code of practice that may be required by the Director of the OHS Division.
- A legible copy of any other information that is required to be posted pursuant to the Act shall be posted in a prominent place for at least 7 days, or for the period of time that may be necessary for employees to have a chance to read it and become familiar with its content. If the material is not posted each employee will be provided with a copy of the information.
- Information to Be Provided by Management
- OHS committee members will be provided with copies of reports pertaining to workplace health and safety inspections or monitoring that has been initiated at the request of a Division Safety Officer. Such reports shall be made available upon request of an OHS Committee Co-Chair.
- Reports regarding workplace OHS inspections and reports of health and safety monitoring or testing undertaken at the workplace must be made available to any employee that makes a request to see this information.
- Within 21 days of receiving a written request from the OHS committee for health and safety information the senior management shall respond in writing providing the requested information. If it is not reasonably possible to provide the information within the 21 days senior management shall provide a reasonable explanation for the delay and indicate when the response will be forthcoming.
- If the OHS Committee is not satisfied with the explanation provided for a delay in management supplying information, the committee shall immediately report this fact to a Division Safety Officer at the Department of Labour and Workforce Development.
- If served with an Order or Compliance Notice, or, if an Appeal is initiated or disposed of, copies of these documents are to be posted on the OHS bulletin board immediately and copies are to be provided to the OHS committee.
- Information to Be Made Available
 - Information about any hazards that may exist in the workplace.
 - A copy of any regulation that is applicable to the workplace and any information and reports that will help employees become familiar with their rights and responsibilities under the Act and its regulations.
 - A copy of the Occupational Health and Safety Program is to be made available to employees, upon request, for reference purposes and to ensure they can remain familiar with the program material.

- Upon written request, by the OHS committee or a committee member, a copy of the Workers' Compensation Board annual summary pertaining to this workplace.

- Training
 - In addition to any formalized training that is made available Tool Box Talks, briefing sessions and employee appraisals are to be used as regular methods of direct communication with employees.

12.0 MAINTAINING PROGRAM RECORDS

Records are to be filed for the period of time specified or as required by the Act:

Type of Record	Retention Time
Records of training	Indefinitely
Certification of First Aid Training	Renewed every 3 years
Certification of Workplace Hazardous Materials Information System training.	Indefinitely or updated upon renewal.
Joint Occupational Health and Safety (JOHS) Committee Minutes	
JOHS Committee letters to management regarding requests or recommendations.	
JOHS Committee letters to management requesting a reply.	
Records of Workplace OHS Inspections	
JOHS Committee records other than minutes.	
Records of disciplinary actions.	
Records pertaining to Right to Refuse actions.	
Maintenance records for tools, vehicles and equipment.	
Material Safety Data Sheets	
Records of Workplace Hazard Monitoring, Measurements and Tests	
Orders, Compliance Notice's, Notice's Of Appeal and Decisions issued by an Officer or the Director of the OHS Division	
Incident / Accident investigation Reports	
Workers Compensation Board Report of Injury – Form 7	
Lists of chemicals substances present at the workplace.	

Consideration should also be given to retaining any other records, drawings, specifications, books, plans or documents in the possession of the employer that relate to health and safety in the workplace for at least five years.

All records shall be made available to any person entitled to see them and specifically to any Officer of the Health and Safety Division upon request of the Officer.

All other records shall be kept for the period that may be specified by the Act or Regulations and where not specified it is recommended that records be maintained for a period of five years.

Exceptions may require records to be kept longer than the above noted specified periods as in the case of an ongoing Workers Compensation Board Claim.

13.0 DISCIPLINARY PROCEDURES

All Facilities Management employees that supervise the activities of other employees / have people reporting to them are responsible for holding such people accountable for their responsibilities under the Nova Scotia OHS Act, the Dalhousie University OHS Program or the Department of Facilities Management OHS Program.

New employees, as well as existing employees must be told that they are responsible for protecting their own health and safety, the health and safety of their fellow employees as well as the health and safety of other people at the workplace and that failure on the part of any employee to comply with their responsibilities may lead to disciplinary action.

Disciplining an employee for any reason is never easy. To avoid this potentially awkward situation and to give employees every chance to work in compliance with all OHS requirements supervisors must make every effort to help and support a problem employee.

Steps to follow in helping an employee correct unsatisfactory work habits:

- a review of training that has been provided
- additional training that may help to clarify a process
- a review of safe job procedures or safe work practices
- an explanation of non-compliance issues and why the employee must follow the requirements of the Act, the regulations and this program.
- more frequent supervision until you are sure that things have been corrected.

If, after attempts to provide help and support, an employee fails to change and their behaviour constitutes a potential hazard to themselves, their fellow employees and other people, disciplinary action is to be considered.

When disciplinary action is taken by management every effort must be made to protect the employee's confidentiality.

The disciplinary process will consist of the following four (4) steps:

- a verbal warning
- a written warning
- suspension without pay
- termination of employment

The following is an example of how the disciplinary process can be implemented:

If a supervisor observes an employee performing a job in a way that is not in compliance with the requirements of the Act, regulations or this Health and Safety Program every effort should be made to help the employee make changes. If the employee fails to begin working in compliance they should receive a verbal warning.

A verbal warning shall, as a minimum, consist of an explanation of what the employee was doing wrong, an explanation of how they can correct the problem, a reminder that such action will not be tolerated in the workplace and notification that further disciplinary measures will be taken if the employees does not change their ways. The supervisor must always prepare a written record of what took place and ensure that a copy is provided to FM Human Resources for the employee's personnel file.

If over time the employee continues to perform their work improperly or in a non-compliant way, the employee is to be given a written warning. A copy of the written warning is to be sent to each of the following:

- the employee
- the employee's personnel file
- Union Employee Relations Officer

If an employee is involved in a third occurrence, the employee is to be suspended without pay for an appropriate period of time. The period of suspension will depend on the severity of the non-compliant action(s) or the hazardous condition that exists as a result of the employee's non-compliance and, its potential impact on the health and safety of the employee, other employees or other persons at the workplace.

If the employee is involved in a fourth occurrence serious consideration must be given to terminating the employee's employment. Such action is to be taken only after discussion between the employee's Supervisor, Manager, FM Human Resource representative and the Assistant Vice President of Facilities Management.

Discipline is intended to be a corrective measure not a punitive measure.

14.0 PROGRAM MONITORING AND AUDITING

Three separate processes will be used to monitor and assess the effectiveness of this OHS program:

- 1) ongoing monitoring of day-to-day activities to ensure the health and safety program requirements are being followed,
- 2) formal year end reviews of the various elements of the health and safety program, and;
- 3) formal audits of the health and safety program carried out by; either a well trained internal audit team or by an qualified external auditor.

14.1 Day-to-Day Monitoring

Supervisors shall monitor the day-to-day activities of all employees, to ensure they regularly follow the safety and health standards and procedures that apply to their jobs and to activities in general at the workplace.

If a supervisor observes an employee working in an unsafe fashion they shall explain to the employee what he or she is doing wrong and how to properly do the work in a safe and healthy fashion, so as to be in compliance with this OHS Program and the Occupational Health and Safety Act and its Regulations.

14.2 Annual Reviews

The annual health and safety program review will be carried out to:

- ensure that the requirements of the OHS program are being implemented and followed,
- provide management with the information they require to identify program strengths and weaknesses so that they can develop and implement changes for improvement
- that legislated minimum requirements are being met.

Annual reviews shall be performed using the Annual Occupational Health and Safety Program Report form. Annual reviews must be completed as part of the year end process to ensure adequate funds are allocated for health and safety activities during the coming year.

14.3 Health and Safety Program Audits

A formal audit should be performed on a regular basis to ensure that this health and safety program is being effectively implemented and that all employees and supervisors are fulfilling their duties and responsibilities.

If the audit is performed internally, the audit team must be properly trained in health and safety audit techniques prior to carrying out the audit.