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**PRESIDENT'S NOTE**

***The Occupational Health and Safety Program is to provide guidance to all employees and contractors, this program outlines the initiatives that will be undertaken to ensure worker health and safety. Details of these initiatives are to be found in various policies, procedures and work instructions that will be made available to all employees.***

***Our goal is to enhance awareness and provide knowledge to all our employees, with the aim of creating a safer work environment for all. Let us all strive to be SAFETY proactive and personally committed to the belief that "Safety is my responsibility!!"***

***Louvec Contracting Ltd. expects every employee and every contractor to follow all directives in this program.***

Signed: \_\_\_\_\_  
Louvec President / Owner

Signed: \_\_\_\_\_  
Health & Safety Coordinator



## **CORPORATE SAFETY POLICY:**

*It is the policy of **Louvec Contracting Ltd.** to provide a working environment free of recognized hazards in order to protect the health and welfare of all our employees, contractor employees, visitors and their respective property. Management is committed to providing an OHSMS that addresses physical, psychological, and social well-being of all involved. Safety is our top priority.*

*It is the objective of our safety program to provide health and safety policies and procedures, to protect the well-being of everyone and to reduce the human and financial costs associated with incidents occurring during the course of operations.*

*Employees, at every level, are responsible and accountable for the company's safety performance. Active participation from everyone is necessary to achieve superior level of safety.*

*Management will insist that behavior and performance meets the company's safety standards, that safety training is provided when required, and that all accidents and near misses are investigated so that corrective action can be taken to prevent recurrence.*

*Supervisors will ensure; that workers know their safety responsibilities, that all workers are well trained in their job processes and the associated hazards, that all substandard conditions and practices are corrected and that all workers wear personal protection equipment when and where it is required.*

*Workers are required; to perform their duties in accordance with all Louvec Contracting Policies, Safe Work Practices and Procedures, to report accidents and near misses, to report substandard conditions and practices, and to wear their personal protection equipment when required.*

*Contractors and visitors visiting and working on **Louvec Contracting Ltd.** worksites are required to comply with the company's safety policies and procedures.*

*Employees at all levels, contractors, visitors, and partners must comply with the safety legislation of the jurisdictions that the company operates in.*

*In order to be successful, we all must treat safety as priority.*

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Date

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Louie Vecchio



*President / Owner*

## **FOREWORD**

There are several reasons why Louvec Contracting Ltd. must maintain a documented Occupational Health and Safety Management Program. Most importantly, an effective safety program will guide us in our efforts to improve the safety of our employees and in identifying and controlling unsafe conditions and unsafe actions of people.

Alberta OH&S Regulations require every employer in Alberta to have a safe work place for their employees. A good safety program will allow us to do this and also meet our regulatory responsibilities.

The primary objective of the Safety Program is to ensure that Louvec Contracting Ltd. provides proper orientation, safety training and safety-related information to its employees. We can only do this effectively if we base our hazard control on an effective hazard identification and risk assessment of the environment in which we work.

## **PURPOSE**

This program is designed to provide guidance to all employees who are called upon to make decisions that can affect the safety of our own personnel as well as the safety of those we work with. It will outline the initiatives, ongoing processes and future plans of the company in the area of Occupational Health and Safety.

## **TERM**

The Safety Program is effective immediately and will be reviewed annually by management, supervisors and workers to ensure that it remains appropriate to the company's needs. The Occupational Health and Safety Program itself is expected to continue as long as the company exists.

## **SCOPE**

This program will be applicable to all operations and activities of Louvec Contracting Ltd. as well as its employees and contractors.



## OBJECTIVES

The primary long-term goal of the Louvec Contracting Ltd. safety program is;

**“To do everything reasonable to ensure that all employees are trained, equipped and encouraged constantly to work safely.”**

During the current calendar year Louvec Contracting Ltd. will pursue the following goals and objectives:

- a. Compliance with applicable Occupational, Environmental, Health & Safety Laws & Regulations.
- b. Stressing the importance of reporting hazards and near miss incidents.
- c. Review and update Louvec Contracting Ltd.’s Health and Safety Program as applicable
- d. Maintain the Certificate of Recognition issued by the Alberta Safety Council.



## **Section 1 - Management Leadership and Organizational Commitment**

### **1. OCCUPATIONAL HEALTH AND SAFETY PROGRAM:**

- a. Louvec Contracting has developed an Occupational Health and Safety Program that is applicable to all employees, contractors and visitors of the company.

### **2. OH&S POLICY REVIEW**

- a. The program will be reviewed annually by the Safety Coordinator.

### **3. COMMUNICATION OF THE OH&S POLICY**

- a. The Safety Coordinator is responsible to ensure that copies of this program are available to all employees, contractors and visitors.
- b. Management is expected to understand the program and to be able to relate the meaning to employees, contractors and visitors.

### **4. EMPLOYEE AWARENESS OF THE OH&S PROGRAM**

- a. Supervisory personnel are expected to regularly discuss this program with employees and contractors to ensure their understanding and compliance with all applicable aspects of the Safety Program.
- b. Employees are expected to understand the intent of the OH&S Policies and all aspects of the Safety Program that are applicable to them.
- c. All employees are expected to comply with the Safety Program.

### **5. HEALTH AND SAFETY RESPONSIBILITIES**

This section defines the functional responsibilities of Louvec Contracting Ltd. employees, as well as third party companies or individuals who perform contract work for Louvec Contracting Ltd.

Every employee within Louvec Contracting has the responsibility to perform his/her work in a manner consistent with legislation, industry standards and company policies, practices and procedures. Reviewing, understanding and applying environmental standards to day-to-day disciplines and situations are key to meeting the obligations of this responsibility.

- a. Appropriate employees will be assigned specific health and safety responsibilities in a job description that pertains to their job position.
- b. General health and safety responsibilities are as follows:



### **President / Owner**

The President is responsible for the overall development and implementation of the Louvec Contracting Health and Safety Program (HS Program).

- *Providing manpower and resources to maintain an effective HS Program.*
- *Support the establishment of health and safety policies that best support the corporation.*
- *Maintaining communications with the Health and Safety Manager on environmental and safety issues.*
- *Assigning environmental and safety responsibilities to staff not described in the Louvec Contracting HS Program.*
- *Monitoring and evaluating the Louvec Contracting HS Program performance.*
- *Taking action to correct unsatisfactory environmental and safety performance.*
- *Recognizing and positively reinforcing acceptable levels of environmental and safety performance.*
- *Implementing environmental and safety education and training programs which are appropriate to ongoing needs.*
- *Enforce all established safety regulation and work methods. Take disciplinary action whenever necessary to ensure compliance with the rules.*
  
- *Ensure that Personnel Protective Equipment (PPE) is available.*
- *Ensure that regular inspections are completed accordingly.*
- *Responding to media inquiries.*
- *Setting a good example.*

### **Safety Coordinator/Office Manager**

The Louvec Contracting Safety Coordinator and Office Manager are responsible for implementing the Company HS Program and for assisting in the development and implementation of the Safety Plans for special operations and projects.

Responsibilities include:

- *Implementing health and safety standards and procedures.*
- *Measuring compliance with company standards and procedures.*

- *Evaluating the effectiveness of the safety program.*
- *Identifying and assisting in preparing the specific safety requirements.*
- *Stay current with OH&S legislation.*
- *Conducting periodic checks to assess compliance with environment and safety standards.*
- *Reviewing incident records for correctness and completeness.*
- *Taking immediate action to correct unsatisfactory environmental or safety performance or conditions.*
- *Conducting a preliminary investigation upon the report of an incident.*
- *Perform worksite inspections.*
- *Perform office, shop and yard inspections.*
- *Provides regular reports to upper management on the results of the safety program*
- *Provides options and training for corrective actions.*
- *Perform Audits as required.*
- *Setting a good example.*

### **Business Developer (BD) and Foreman**

The BD and Foreman are responsible for promoting environmental/safety awareness and demonstrating to the workers, through day-to-day example and actions, that environmental and safety compliance is a top priority of the company.

Responsibilities include:

- *Conducting task-specific environmental and safety orientations for new workers prior to assignment of duties, including hazardous product instruction.*
- *Implementing/monitoring the requirements of specific safety requirements.*
- *Providing field level risk assessment training to workers whenever new tasks are assigned.*
- *Issuing appropriate personal protective equipment to workers as required.*
- *Developing and maintaining good housekeeping standards.*
- *Monitoring the work area through personal observation for non-compliance or substandard conditions/hazards and communicating these (with remedial action as required) to appropriate line supervisors or workers.*
- *Holding occasional toolbox meetings with workers.*

- *Verifying that operators complete equipment, vehicle and trailer inspections.*
- *Checking that operators are qualified fit and authorized to operate equipment or vehicles safely.*
- *Assist/Conduct incident investigations.*
- *Taking immediate action to correct unsatisfactory environmental/ safety performance.*
- *Setting a good example.*

### **Worker**

All workers are responsible for safeguarding their own health and safety, and the safety of fellow workers.

Responsibilities include:

- *Familiarizing themselves and complying with all environmental/safety rules.*
- *Participating in safety meetings and other related meetings.*
- *Maintaining good housekeeping in the work area(s).*
- *Reporting substandard acts and conditions to their supervisor.*
- *Reporting personal injuries, no matter how minor, and obtaining medical attention as required.*
- *Cooperating with, or participating in, environmental and safety incident investigations as required.*
- *Wearing adequate personal protective equipment.*
- *Attending the safety orientation and any training as required.*
- *Participating in field level risk assessments.*
- *Setting a good example.*

### **Subcontractors**

Subcontractors for Louvec Contracting are responsible for the safety of their workers.

Responsibilities include:

- *Complying with applicable environment and safety legislation.*
- *Complying with the Louvec Contracting health and safety requirements.*
- *Attending an on-site worker safety orientation meeting as required.*

- *Before commencing work, contact the Safety Coordinator or his delegate for instructions regarding environmental and safety hazards.*
- *Advising their workers of the Louvec Contracting health and safety requirements and verifying compliance through personal observation.*
- *Providing education, training and enforcing the use of applicable personal protective equipment.*
- *Reporting of all accidents and injuries and investigating lost time accidents.*
- *Making arrangements with the Safety Coordinator or his delegate concerning emergency procedures.*
- *Immediately correcting any substandard conditions or acts observed on their worksites.*
- *Immediately reporting to the Safety Coordinator or his delegate any substandard acts and conditions observed outside of their worksite.*
- *Maintaining good housekeeping practices in their work areas.*

#### **Visitors, Suppliers and Consultants**

Visitors, suppliers and consultants are responsible for safeguarding their own health and safety and the safety of workers.

Responsibilities include:

- *Reporting to the office to sign in before entry.*
- *Participating and complying with environmental and safety directives.*
- *Wearing adequate personal protective equipment.*
- *Reporting any substandard acts and or substandard conditions which could have any negative safety or environmental consequence.*
- *Reporting any injury sustained on the jobsite.*

#### **6. EMPLOYEE UNDERSTANDING OF RESPONSIBILITIES:**

- a. Management will provide appropriate instruction and training to ensure that employees and contractors are aware of their responsibilities.
- b. Management will provide appropriate documentation and reference materials to ensure that employees are able to determine their responsibilities in all foreseeable circumstances.
- c. Employees are expected to know, understand and carry out their duties as specified by their job descriptions.



- d. Employees will undergo a safety orientation annually and sign a record indicating they understand all topics covered within the orientation.
- e. Employees will sign their Hazard Assessments to verify in writing that they understand the hazards and controls of their job.

**7. EMPLOYEE PERFORMANCE EVALUATION:**

- a. Evaluation of health and safety performance:
  - i. The job performance of employees shall be reviewed annually, beginning in 2019. This evaluation shall include a section on occupational health and safety performance.
  - ii. On an on-going basis, supervisors and management are expected to view and comment upon the health and safety performance of employees as appropriate to recognize acceptable behavior and to deal with unacceptable behavior.
  - iii. Documentation used:
    - Employee Evaluation
- b. Discipline Process.
  - i. Management must deal appropriately with unacceptable employee performance in all areas, including the area of occupational health and safety.

**8. COMMUNICATION OF COMMITMENT TO HEALTH AND SAFETY**

- a. Louvec Contracting has a duty to show commitment to the occupational health and safety program at all times. Managers' commitment may be shown in many ways:
  - i. By taking immediate action when safety rules are not followed or appropriate safety devices are not used.
  - ii. By communicating approval when safety rules are followed well and when safety devices are used properly.
  - iii. By recognizing and expressing approval of pro-active efforts of employees that are aimed at improving occupational health and safety.
  - iv. By ensuring that employees are aware that managers are looking for and recognizing both positive and negative health and safety issues when they visit worksites.
- b. Management will formally communicate its commitment to occupational health and safety to all employees at meetings or in writing at least once annually. This can be done at the employee orientation or even on the "safety board" located in the shop.



**9. MANAGEMENT MONITORING OF WORKSITES**

- a. The Safety Coordinator will tour Louvec Contracting’s facility at least once annually.
  - i. One of the objectives of this tour will be to ensure that hazard controls remain in place and that safe work practices are being followed.
  - ii. This is an opportunity to promote and show commitment to the occupational health and safety program.
  - iii. Records shall be maintained of these tours.
- b. First line Foremen shall tour their area(s) of responsibility daily, to show commitment to the program and to ensure that hazard controls remain in place and that safe work practices are followed.

**10. COMPLIANCE WITH LEGAL REQUIREMENTS:**

- a. Management is expected to provide all necessary training and information to ensure compliance with all applicable laws and regulations.
  - i. Knowledge of the OH&S regulations is one of the critical resources needed to ensure hazards are controlled.
    - Management is expected to actively work to identify all hazards in the workplace.
    - Management is expected to have and be aware of all legislation and regulations pertaining to occupational health and safety in our industry. This will include:
      - a. The Occupational Health and Safety Act
      - b. The Occupational Health and Safety Regulations.
      - c. Dangerous Goods Transportation and Handling Regulation.
      - d. Traffic Safety Act and associated regulations.

**11. CONTRACTOR SAFETY:**

- a. Management recognizes that it has the same responsibilities with respect to the health and safety of contractors as it has for that of employees when the contractor is working on our sites or on our customer’s sites (referred to as “our sites”).
- b. Contractor Safety:
  - i. Contractor safety will be assured by expecting contractors to be aware of, and follow the same health and safety rules and procedures as employees are expected to follow.



- ii. An employee will be designated to monitor the activities of contractors working on site. The designated employee will be responsible to ensure that the provisions of this program are complied with.
- iii. A contractor package will be given to all contractor employees. Every contractor will be expected to acknowledge that they and their employees have read and understands the content of the package. This acknowledgement will be in writing and must be provided to our staff before work begins.

**12. VISITOR SAFETY:**

- a. The safety of visitors will be ensured by requiring that all visitors must be accompanied by a responsible and authorized Louvec Contracting employee.
- b. Documentation used:
  - i. Visitor Sign In Log

**13. PROVISION OF RESOURCES:**

- a. Management is expected to identify the need for and to provide the necessary resources to ensure work can be done in a safe and healthy manner. This must be done according to the company's approved safety guidelines.
- b. The term "Resources" refers to:
  - i. Workers
  - ii. Equipment
  - iii. Approved procedures, practices or methods
  - iv. Materials
  - v. Finances

## **Section 2 - Hazard Identification and Assessment**

### **1. JOB INVENTORY:**

- a) An inventory shall be made of all tasks carried out by management, supervisors and workers:
  - i) All job positions shall be listed
  - ii) For each job position, a list shall be developed of the tasks that are normally carried out by people in that job position.

### **2. IDENTIFICATION OF HAZARDS**

- a) For each of the tasks identified in the process described in a) above, all identifiable health and safety hazards shall be listed. Consideration will be given to:
  - i) Location(s) where the tasks are carried out
  - ii) Ambient conditions in the locations where the tasks are carried out
  - iii) Chemicals used by crew
  - iv) Tools and equipment used by crew
  - v) Physical activities carried out.
  - vi) Processes carried out by crew.
  - vii) Other workers/crews present on site, as well as the hazards, conditions, processes influenced by their involvement and proximity.
- b) The Safety Coordinator shall carry out this identification process. Wherever practicable, worker(s) who carry out the task shall be consulted in completing this process.
- c) Consideration shall be given to health and safety hazards in the physical environment in which the tasks are carried out, in the areas under the care and control of Louvec Contracting respectively, and in areas outside Louvec Contracting control (for example, supplier or customer sites).

### **3. EVALUATING HAZARDS:**

- a) Evaluation Process:
  - i) Each hazard shall be reviewed and evaluated from 3 points of view:
    - (1) How serious would be the consequences of exposure to this hazard?
    - (2) How likely is it that an incident would occur if a worker would be exposed to this hazard?



(3) How frequently would a worker be exposed to the hazard?

ii) Each hazard shall be rated 1, 2, 3 or 4 for potential consequence:

(1) 1 – Negligible: Injury, illness, and property not likely to occur.

(2) 2 – Marginal: first aid and minor injury or property damage.

(3) 3 – Critical: medical aid, lost time injury, property damage.

(4) 4 – Catastrophic: a serious injury/death or significant property damage.

iii) Each hazard shall be rated 1, 2, 3 or 4 for probability:

(1) 1 – Practically impossible.

(2) 2 – Possibility of occurring.

(3) 3 – Could probably occur.

(4) 4 – Very likely to occur.

iv) Each hazard shall be rated 1, 2, 3 or 4 for frequency of exposure

(1) 1 – Less than once per month.

(2) 2 – One or more times a month

(3) 3 – One or more times a week.

(4) 4 - One or more times a day.

#### **4. PRIORITIZING THE HAZARDS:**

a) Methods shall be developed to ensure that workers can carry out their work with no undue danger of occupational illness or injury arising from the hazards identified in b) above (See Section 3 for more detail). All hazards must be eliminated or controlled to the extent that is reasonably practicable. The worst hazards (highest risk) shall be controlled first.

b) Each of the hazards identified in the process described in above shall be assigned a priority for control. The priority calculation shall be as follows:

i) Where adequate controls are in place, there is no need to prioritize the item

ii) For uncontrolled hazards, priority ratings from 1 to 5 will be determined using the process described below:

(1) The ratings for each hazard will be totaled. The maximum rating is 12. The minimum rating is 3.

(2) The priority rating will be determined by the Safety Coordinator and where available, the worker.

#### **5. WORKER INVOLVEMENT:**

a) It must be recognized that the employee who actually does the job will be most familiar with the tasks and hazards associated with doing that job. All individuals in each job shall be offered the

opportunity to participate in the Hazard Identification and Assessment and to recommend improvements to the process and hazard controls.

- b) All employees are required to review and sign their Hazard Assessment, these assessment are reviewed and signed annually.

#### **6. KEY EMPLOYEE TRAINING:**

- a) The success of the Hazard Identification process is dependent on the skill and training of the people that provide leadership in the process. The Safety Coordinator will be trained in the Hazard Identification and Assessment process and will lead the initial round of hazard identification and assessment.

#### **7. NEW AND CHANGED PROCESSES**

- a) The Hazard Assessment for each position within the job inventory shall be reviewed at least once every year, or whenever any significant change occurs to;
- personnel, organization, and/or systems
  - job tasks, processes and/or procedures
  - equipment, materials and/or substances
  - environmental and/or proximate conditions
  - governing rules, policy or legislation
- b) In order to address and manage these changes, the revised Hazard Assessment must identify all hazards present. Each change or additional step in the procedure must be analyzed to identify specific risks as well as control measures to be implemented.
- c) Once identified and prioritized an action plan must be developed. This plan shall include a timeline and will allocate and document responsibility for the implementation of required controls. It shall address all affected;
- operations, maintenance and inspection procedures
  - equipment and processes
  - training requirements
- d) This information must be relayed and available to every effected worker/person

These steps are all to be carried out in accordance with Sections 2 and 3 of the Health and Safety Program.



**8. ACTION PLANS AND FOLLOW UP:**

- a) Action shall be taken to correct all hazards identified through the Hazard Assessment process.
- b) An action plan will be developed after each review. The plan shall include:
  - i) The hazard,
  - ii) The required control(s)
  - iii) The planned action,
  - iv) The target date for completion
  - v) The person / people responsible to carry out the action, and
  - vi) The actual corrective action completion date.
  - vii) Scheduled review to assess the effectiveness of the control(s)

## **Section 3 - Hazard Control**

### **1. CONTROL OF IDENTIFIED HAZARDS:**

All the hazards that are identified in the hazard assessment process (see section 2), in the inspection process (see section 4), in the incident investigation process (see section 7) or by any other means shall be controlled using the most effective practical methods.

If emergency action is required to control or eliminate a hazard that is dangerous to the safety or health of workers,

- (a) Only those workers competent in correcting the condition, and the minimum number necessary to correct the condition, may be exposed to the hazard, and
- (b) Every reasonable effort must be made to control the hazard while the condition is being corrected.

Hazard controls can be broken down into three categories:

#### **i) ENGINEERING CONTROLS**

- (1) Engineering controls are the preferred control method. These are normally the most effective hazard control methods because they are mechanical, electrical or other devices that make it more difficult or, even impossible for the worker to be exposed to the hazard.
- (2) Engineering controls shall be used wherever practicable in the control of hazards identified in our workplace

#### **ii) ADMINISTRATIVE CONTROLS**

- (1) Administrative controls are controls based on compliance with policies, rules, and procedures.
- (2) While administrative controls often have the potential to be effective, they are sometimes not fully effective because of non-compliance.
- (3) Workers may fail to comply with the rules for various reasons. Chief among these are:
  - (a) Workers may not know the rules
  - (b) Workers may know the rules but may not understand the reasoning behind the rules.
  - (c) Workers may choose not to comply with the rules.

#### **iii) PERSONAL PROTECTIVE EQUIPMENT (PPE)**

- (1) PPE is sometimes the only practicable way to protect workers from the hazard.

- (2) Personal Protective Equipment can often effectively protect the worker from the hazard, but the hazard remains in place. This is why PPE is the least preferable of the three hazard control methods.
- (3) Management will identify positions and tasks where PPE is mandatory and where it is optional.
- (4) PPE used on our sites or on customer sites shall meet the following basic standards. (More specific requirements may be developed and implemented for specific situations):
  - (a) **Foot Protection**
    - (i) CSA/ANSI approved footwear having a green triangle sewn on the footwear itself.
  - (b) **Hand Protection**
    - (i) Well-fitting gloves that are suitable to the job being done. Examples include but are not limited to;
      - Work gloves
      - Rubber or latex gloves
      - Insulated gloves
    - (ii) The appropriate type of chemical gloves will be used when working with any hazardous substance in accordance with product MSDS.
  - (c) **Head Protection**
    - (i) CSA/ANSI Standard Hard Hat.
  - (d) **Hearing Protection**
    - (i) Hearing protection that is appropriate to; the task being done, exposure levels (DbA's) and duration of exposure.
    - (ii) Class A ear defenders in areas where this requirement is posted
    - (iii) Class A ear defenders or plugs in all areas where noise levels reach 85 DbA or greater
  - (e) **Respiratory Protection**
    - (i) Respiratory protection is task/exposure specific as well as site specific – as required by our Respiratory Code of Practice
  - (f) **Protective Clothing** as legislated or specified by customers while on customer sites
  - (g) **Approved Fire Retardant work wear** , where required by legislation, policy and/or customers

(i) When an employee(s) is subject to flash fires or electrical equipment flashovers, the employee is required to wear flame resistant outerwear along with any other Personal Protective Equipment deemed to be necessary.

(ii) Where Flame resistant outerwear is required, the clothing worn against the skin must be made of a flame resistant fabric or natural fibers that will not melt when exposed to heat.

**(h) Fall Protection**

- (i) Approved Fall Protection when working at height that could cause serious injury. The base guidelines are laid out in Part 9, Section 139(1) of Alberta Occupational Health and Safety Code.
- (ii) The harness must be properly adjusted and secured to an engineered anchor point.

**(i) Face Protection**

Safety shields will be used in situations where there is;

- (i) a danger of impact to the face as well as to the eyes
- (ii) a danger of injury due to chemical spills or exposure.

**(j) Eye Protection**

- (i) Eye protection that is appropriate to the task being performed and the potential hazards involved
- (ii) Safety approved prescription glasses complete with side shields
- (iii) CSA approved safety glasses.
- (iv) Where an employee wears contact lenses, the supervisor must inform the worker(s) when there is a hazard that could pose a danger to the eyes as a result of the contact lenses.
- (v) The supervisor must advise the worker(s) wearing the contact lens of the alternative method of protecting the eyes.

**2. WORKER PARTICIPATION IN HAZARD CONTROL**

- a) Management shall actively encourage worker participation in the process of identifying, assessing and controlling occupational health and safety hazards.

**3. USE OF HAZARD CONTROLS**

- a) All employees of Louvec Contracting shall remain aware that they have a clear responsibility to use and maintain all implemented hazard controls – While in/on Louvec Contracting facilities/sites as well as while in/on customer sites.

#### 4. EQUIPMENT MAINTENANCE / DEFECTIVE EQUIPMENT

- a) Appropriate measures shall be taken to ensure that all tools and equipment are maintained in a manner to ensure reliability and safety.
- b) Employees will complete an inspection of equipment and either a walk around or inspection of vehicles prior to use. If the inspection reveals that a vehicle or piece of equipment requires maintenance then the employee is to immediately notify management and record the findings on the forms and also fill out and attach a maintenance request form and put this in the maintenance bin in the shop. Otherwise these records will be collected from the safety bin, by the office periodically for review and filing.
- c) Damaged or defective equipment shall be removed from service and repaired as soon as practicable. Employees will record this on the inspection forms and also attach a maintenance request form and place these forms in the maintenance bin for the completed maintenance or repair to take place by an employee or outside contractor. Once the maintenance or repair is completed the remaining part of the maintenance for is completed and signed off and placed in the safety bin for filing. As well please find the vehicle or equipment in the maintenance binder and record what was done
- d) Damaged or defective equipment that poses a risk to health or safety shall be removed from service immediately.
- e) Management shall be informed whenever damaged or defective tools or equipment are removed from service according to the instructions applicable to the specific work area
- f) Preventive Maintenance Programs as specified by manufacturer of equipment shall be followed, there are copies of these within the maintenance binder in the shop. This binder will be used to record all maintenance and repairs completed.
- g) The large whiteboard in the shop will also contain updates on vehicle and equipment maintenance that is upcoming, this board will be updated by the Safety coordinator, based on the records within the maintenance binder.

#### 5. ENGINEERING CONTROLS

- a) No engineering control may be de-activated or made ineffective while normal work processes continue without the expressed approval of a management representative responsible in the applicable work area.
  - i) Deactivating an engineering control may result in severe illness or injury or even in death.
  - ii) Where an employee is found to have deactivated an engineering control without proper authorization, that employee is guilty of an offence that will result in serious corrective action or even immediate termination.

- iii) Supervisors, Managers and designated representatives that authorize the de-activation or removal of engineering controls may bear responsibility for any incident or injury resulting from the deactivation. This type of action must only be taken in the most unusual of circumstances and only after due consideration of all factors.

**6. ADMINISTRATIVE CONTROLS:**

- a) Employees are expected to comply with all administrative controls that have been implemented for their safety.

These may include:

- (1) posted rules and procedures,
  - (2) procedures, safe work practices and work instructions that are contained in training documentation, and
  - (3) verbal work instructions.
- b) Supervisors and managers shall comply with all administrative health and safety hazard controls.
  - c) Supervisors and managers shall ensure that all workers are aware of administrative health and safety hazard controls and shall encourage workers to comply with all administrative health and safety hazard controls applicable to them and scope of work.
  - d) Every Supervisor, Manager or designated representative that witnesses a failure to comply with administrative health and safety hazard controls shall take immediate action to:
    - i) Ensure immediate compliance
    - ii) Report the details of the non-compliance through the appropriate channels
    - iii) Ensure that the appropriate degree of disciplinary action is taken, keeping in mind the disciplinary process described below.
  - e) Disciplinary action for Safety Issues:
    - i) Disciplinary action is a practice aimed at teaching and at correcting actions, rather than punishing an individual for any wrongdoing.
    - ii) Before management determines that it is appropriate to take any disciplinary action at all with a worker, it must look at its own systems. It must be sure that the employee should have known better than to act as he/she has acted. Management must consider:
      - (1) Is there a communicated work instruction, rule, regulation or directive in place directing the worker's activities in the area in question?



- (2) Were the instructions adequate to deal with the situation?
  - (3) Is there evidence to prove that the worker in question has received instruction or training in relation to the instructions mentioned above, and
  - (4) Did the employee have the adequate skills, instruction and confidence to perform the task safely? Is there an issue in regard to the frequency of the activity that may warrant retraining or reinstruction?
- iii) Upon determination that the employee has breached Company Policy, management must decide between two options:
- (1) Were the employee's actions most likely the result of willful or careless disobedience of the rules/ instructions, or
  - (2) Was the employee's action most likely inadvertent disobedience of the rules/instructions?
- iv) When the employee's actions were non-repetitive or most likely inadvertent, management should normally elect to retrain or re-instruct the employee.
- v) When the employee's actions were most likely willful, management shall consider imposing the appropriate disciplinary action according to the disciplinary policy.

**Disciplinary actions must always:**

- (1) Be well considered: after the unacceptable actions have been stopped, there is always enough time to consult with senior management before taking the disciplinary action.
  - (2) Be appropriate in relation to the severity of the offense, keeping in mind the employee's disciplinary history (has he/she committed this or similar offenses in the past?)
  - (3) Be applied consistently.
    - (a) All employees that commit similar offenses should be subject to similar disciplinary action.
  - (4) Be progressive.
    - (a) If the employee has committed the same or similar offenses in the recent past, the disciplinary action should escalate from a lower to a higher step (see v) above).
  - (5) Be effective.
    - (a) Management has the responsibility to ensure that disciplinary action and training is effective. The employee's supervisor must ensure that the employee's actions in the long term are brought into compliance with the rule or instruction.
- vi) The disciplinary activities of a manager may be considered ineffective if:
- (a) Employees in the manager's area of responsibility receive repeated warnings for the same or similar offense, but continue to commit that offense.

- (b) Employees actions regularly do not comply with company-approved rules or instructions
  - (i) The manager is seen to condone some offenses while taking action on others.

## **7. AVAILABILITY OF PERSONAL PROTECTIVE EQUIPMENT**

- a) Personal protective equipment (PPE) shall be available to be worn whenever it is required to control identified health and safety hazards.
  - i) The following PPE shall be provided by the company once at time of hire only :
    - (1) Reflective Safety Vest
    - (2) Hard hat
    - (3) Eye protection as required (goggles, face shields, safety glasses),
    - (4) Appropriate gloves as required
    - (5) Hearing protection as required
  - ii) The following PPE shall be provided and maintained by the employee:
    - (1) Work outerwear (unless specific items are required by Louvec Contracting Division, by the customer while on customer sites or by a supplier while on the supplier's site).
    - (2) Appropriate footwear (The worker is responsible to provide footwear that complies with the safety requirements mentioned previously).
    - (3) If company supplied PPE is lost or damaged by Employee, it will be the employee's responsibility to replace required mandatory PPE.
  - iii) The following PPE will be provided by the customer :
    - (1) Equipment required for specific on site hazards.
    - (2) Respiratory Protective equipment.

## **8. WORKER TRAINING IN USE, CARE AND MAINTENANCE OF PPE**

- a) PPE shall be maintained in a condition that ensures it is effective in protecting the worker from the identified hazard.
- b) PPE shall be maintained as per manufacturer's instructions.
- c) Workers shall be trained in the proper use, care and maintenance of the PPE that is required for the job performance.



**9. USE OF PPE CONTROLS WILL BE ENFORCED:**

- a) Supervisors and managers shall comply with all PPE health and safety hazard control provisions and shall encourage workers to comply with all PPE health and safety hazard control provisions.
- b) Every supervisor or management representative that witnesses a failure to comply with PPE health and safety hazard controls shall take immediate action to:
  - i) Ensure immediate compliance
  - ii) Report the details of the non-compliance through the appropriate channels
  - iii) Ensure that the appropriate degree of disciplinary action is taken, keeping in mind the disciplinary process described in item 6. d) above.

## Section 4 - Inspections

### 1) INSPECTION PROCEDURE:

- a) Managers and Supervisors at all levels are expected to conduct regular informal (un-documented) inspections of their area of responsibility to ensure that hazards and unsafe work practices are identified and corrected.
- b) The following formal (documented and recorded) inspections shall also be carried out. The purpose of these inspections shall be to:
  - (1) Verify the effectiveness of the informal inspection process
  - (2) Identify and correct situations where identified hazard controls are removed or ineffective
  - (3) Identify previously unrecognized physical hazards or unsafe work practices.
  - (4) Observe work activities and verify that these are carried out in compliance with approved safe work procedures and practices.
- i) Annual Inspection
  - (1) One or more managers or supervisors shall participate in a formal inspection of the office, shop and yard on an annual basis.
- ii) Weekly Inspections:
  - (1) Safety Coordinator, is responsible for carrying out weekly site inspections, during paving season. These site inspections are for jobsites, one location will be chosen per week and an inspection will be completed. Unless no work is being carried out, for example in the winter or during rain.
- iii) Daily Inspections:
  - (1) Each worker is responsible for inspecting their PPE for serviceability.
  - (2) Each worker is responsible for inspecting their tools and equipment prior to use for serviceability.
  - (3) Any items found deficient will be tagged and removed from service and the worker will notify the supervisor.
- iv) Field Level Hazard Inspection:
  - (1) The Foreman, Assistant Foreman, Health and Safety Representative or designate is responsible for the completion of this document prior to the start of any work or re-commencing of work on a different day.
  - (2) Discussion of this document with all crew members and sign off is required prior to the start of work.

- (3) If there are changes to the job site then the FLHA needs to be reviewed for any new hazards.
  - (4) Anyone entering the jobsite, including workers, visitors and contractors, need to review the FLHA and sign off that they understand the hazards of the jobsite, and conform to all controls in place.
- v) Equipment Inspection:
- (1) Every piece of Louvec Contracting heavy equipment has a corresponding inspection book, located in, on or near the machine.
  - (2) Prior to use, an inspection must be completed using the inspection booklet. A copy of this inspection is placed in either the maintenance bin (if maintenance is required) or safety bin (no maintenance required).
  - (3) Training on completing a proper equipment inspection will take place at orientation or by the Foreman, Assistant Foreman or Health and Safety Representative.
- vi) Commercial Vehicle Inspections:
- (1) Vehicle units 07, 09 and 11 are registered commercial vehicles. Therefore these vehicles require a pre-trip inspection prior to use.
  - (2) Each commercial vehicle will have a pre-trip inspection booklet located inside the truck cab.
  - (3) Prior to use, an inspection must be completed using the inspection booklet. A copy of this inspection is placed in either the maintenance bin (if maintenance is required) or safety bin (no maintenance required).
  - (4) Training on completing a proper equipment inspection will take place at orientation or by the Foreman, Assistant Foreman or Health and Safety Representative.
- vii) Pick up Truck Inspections:
- (1) All other vehicle units (as described above) will only require a walk around prior to use.
  - (2) Each vehicle is equipped with a walk around clip board and this must be signed and dated, indicating a walk around inspection was completed, prior to using the vehicle.
  - (3) Every Thursday each vehicle will undergo a thorough inspection, the same as the commercial vehicle pre-trip. The inspection booklets for these weekly inspections are located within the cab of the vehicle.
  - (4) Training on completing a proper vehicle walk around inspection and weekly inspection will take place at orientation or by the Foreman, Assistant Foreman or Health and Safety Representative.

## **2) WORKER INVOLVEMENT IN THE INSPECTION PROCESS:**

- a) Workers are expected to inspect the tools and equipment they use before use. It is to determine that it is safe to use and are expected to conduct an informal (un-documented) inspection of each area where they will work to ensure that there is no un-controlled hazards in the area.

**3) TRAINING IN INSPECTION PROCEDURES:**

- a) Managers, supervisors and workers that are expected to conduct inspections shall be trained in the inspection process in formal in-house training programs.

**4) VERIFICATION OF INSPECTIONS:**

- a) Written reports of the details of the formal inspections shall be forwarded to the office within 1 week of the completion of corrective actions from the inspection. These reports should be reviewed and signed off by the inspector.

**5) CORRECTION OF DEFICIENCIES:**

- a) Management is responsible to ensure that hazards identified during inspections are eliminated or controlled to the degree that it is reasonably practicable to do so.
- b) Appropriate records of corrective actions taken shall be developed and retained on file with the inspection reports

**6) REPORTING UNSAFE OR UNHEALTHY CONDITIONS:**

- a) All managers, supervisors and workers are asked and expected to take action to correct unsafe or unhealthy situations as soon as possible after they are identified.
  - i) Where the individual is not personally able to correct the situation, he or she is expected to report the situation on their "Inspection form" and submitting it to the office.
  - ii) All employees are also encouraged to report such conditions verbally in face-to-face meetings with supervisors.
  - iii) Issues may also be reported using the "Near Miss / Incident/ Accident Report Form"

**7) CORRECTIVE ACTION FOR REPORTED INCIDENTS OR CONDITIONS**

- a) Managers that receive reports of unsafe or unhealthy situations from employees shall investigate the situation and shall take timely corrective action.
- b) In situations that, in the opinion of management, require formalized investigation and follow-up, the investigation shall be carried out at the appropriate level (See section 7) and written reports of the details of these investigations shall be filed.



## **Section 5 - Qualifications, Orientation and Training**

### **1) ENSURING EMPLOYEE COMPETENCY:**

- a) For each job position within operations of the company:
  - i) Minimum qualifications shall be determined and recorded.
  - ii) The process of determination of qualifications and training requirements shall ensure consideration of occupational health and safety issues, where necessary.
  - iii) Legislative requirements as laid out in OH&S will be followed when determining the standard and level of training required for a specific task/job.
- b) Managers that make hiring decisions shall be responsible to ensure that employees that are hired, transferred or promoted into a job positions shall meet the specified qualifications for that job position, including any applicable health and safety considerations.
- c) There shall be a system in place to track qualifications and training, including
  - i) Orientation,
  - ii) On-the-job training,
  - iii) Health and Safety related training, and
  - iv) The need for and the provision of periodic refresher or re-qualification training.
- d) This tracking system will be implemented and maintained by the Safety Coordinator and Office Manager.

### **2) ORIENTATION PROGRAM CONTENT:**

- a) Every employee shall be orientated to the worksite or work situation before any other work is assigned to him or her:
  - i) The orientation program shall be suitable to the type of work being done
  - ii) The "Health and Safety manual" shall be used to orientate new employees.
  - iii) New employees are to receive and review copies of the "Health and Safety manual".
  - iv) All employees must annually review the "Health and Safety manual" and sign off that this responsibility was completed.
  - v) Employees are also given an employee package. Safety related items included in this package are:
    - (1) "Employee Safety Orientation Waiver", every employee signs this indicating they have been oriented on listed items.





(2) "Hazard Assessment Worksheet", this listed all job tasks and rates the hazards, risks and controls, and all employees are required to sign this indicating they know the risks associated with their job duties.

- b) The Foreman/Supervisor is responsible to verify that each employee in his/her area of responsibility is adequately oriented to the working situation before assigning the employee to work unsupervised.
- c) At a minimum, the employee orientation program shall include discussion of:
  - i) Louvec Contracting safety policies.
  - ii) The applicable emergency response responsibilities.
  - iii) The responsibility to correct and / or report unsafe conditions and actions.
  - iv) Hazard identification, assessment and control information applicable to the new employee's assigned position.
  - v) Legislative requirements for their position.

### **3) ORIENTATION PROGRAM TIMING:**

- a) Every new employee in all departments shall be orientated to the worksite or work situation before any other work is assigned to him or her.
- b) In every case, new employee orientation training shall be completed within one week of the employee's start date.

### **4) JOB-SPECIFIC TRAINING**

- a) Employees who are newly hired or transferred or promoted into a new position shall be trained as soon as practicable in all of the skill and knowledge requirements applicable to the new position.
- b) Wherever practicable, competency in all skill requirements shall be assessed by a competent trainer or supervisor and records of this will be filed.
- c) Safe Work Procedures, Safe Work Practices and work instructions shall be generated as necessary to ensure that employees are warned of all the hazards that have been identified in the hazard identification and assessment processes.
  - i) The generation of training documentation pertaining to more hazardous tasks shall be given a higher priority; worst-first!
  - ii) Each employee shall be made aware of the relevant documentation that instructs him/her in safely carrying out all the tasks he/she is asked to do.

### **5) REFRESHER TRAINING AND UPGRADING**

- a) Management is responsible for ensuring that all employee training and certification that needs to be renewed or upgraded is tracked to:



- i) Identify when such training is due,
- ii) Notify the supervisor and the employee in question that the training must be done,
- iii) Ensure that the training is completed, and
- iv) Ensure that certification documentation is received as appropriate.

**6) TRANSFERRED OR PROMOTED EMPLOYEES:**

- a) Supervisors are responsible to ensure:
  - i) that employees who are transferred or promoted receive adequate job-specific training for their new position, and
  - ii) Then management is notified of the change of position.

## **Section 6 - Emergency Response**

### **1) EMERGENCY RESPONSE PLANS:**

- a) Management shall be responsible to develop emergency response plans (ERPs) for all undesirable situations that can be foreseen and identified.
- b) Emergency response plans shall include information on:
  - i) Communication procedures
  - ii) Both internal and external emergency contacts (including phone numbers, pager numbers, etc).
  - iii) Appropriate emergency response personnel
  - iv) Evacuation Procedures

### **2) EMPLOYEES SHALL UNDERSTAND THEIR RESPONSIBILITIES:**

- a) Emergency response responsibilities shall be defined, recorded and provided to incumbents in all job positions. Employees are required to read, and to understand their responsibilities under the ERPs.

### **3) TRAINING IN EMERGENCY RESPONSE PLANS**

- a) Management shall provide employees with documented Emergency Response Plans and shall ensure that they are properly trained in their duties with respect to the plans.

### **4) DRILLS**

- a) Management shall be responsible to plan and conduct drills to test the effectiveness of the Louvec Contracting emergency response plans.
- b) At least one drill shall be conducted annually at the shop and at a random job site.

### **5) EMERGENCY RESPONSE RECORDS**

- a) Management will maintain records of all actual emergency situations that result in property damage or personal injury to employees, contractors or others on Louvec Contracting controlled sites.
- b) Management shall also maintain records of Drills.

**6) REVIEW OF EMERGENCY RESPONSES**

- a) Management shall be responsible to conduct a review of all emergency response activities and drills to ensure that the Emergency Response Plans are adequate to meet the specific situation.
- b) Workers will have input on Emergency Response Plans which may affect their safety and wellbeing.
- c) The results of the review shall be used to identify and implement any opportunities to improve the effectiveness of the emergency response plans.

**7) FIRST AID FOR INJURIES**

- a) Sufficient competent and certified first aid personnel shall be provided to meet or exceed government regulated standards.
- b) Where first aid is required for an injury or occupational illness, it shall be sought as soon as possible after the incident.
  - i) First aid facilities/supplies shall be well marked and accessible at all times.
- c) Any employee who suffers injury or occupational illness shall request first aid attention from a trained first aid attendant and shall report the injury or illness to a Supervisor/Manager as soon as possible after the incident.
- d) The Supervisor/Manager is responsible for documenting the first aid and submitting them to the Safety Coordinator for Review and then to the Office Manager for filing.
- e) When a work related injury or illness requires medical attention or consultation the worker is required to notify their Supervisor/Manager prior to the appointment or within 24 hrs. of the injury.
- f) Once notified it is the Supervisor/Manager's responsibility to notify Louvec Contracting Ltd.'s WCB Claims administrator prior to the injured employees next regularly scheduled workday or within 24 hrs.

**8) FIRST AID FACILITIES**

- a) First aid facilities for every division of Louvec Contracting shall meet or exceed government regulated standards
- b) The Safety Coordinator shall ensure an examination of the first aid supplies and equipment is done as required.



9) **ERP Box**

- a) Each Louvec Contracting vehicle is equipped with an ERP Box.
- b) Every box contains the following items:
  - #2 First Aid Kit
  - Muster point sign
  - Fire Extinguisher
  - Air Horn
  - OHS Legislation
  - Louvec Safety forms
  - Louvec Safety program

## **Section 7 - Incident Reporting and Investigation**

### **1) INCIDENT REPORTING PROCEDURE :**

- a) All undesirable incidents shall be reported. Undesirable incidents include:
  - i) Injuries arising out of and in the course of work,
  - ii) Illnesses that are thought to arise out of work activities / environment,
  - iii) Incidents where, due to the presence of unusual hazards, an employee finds it necessary to refuse to do work requested of him or her, either by senior company employees or by customers,
  - iv) Motor vehicle accidents or incidents that cause vehicle damage to company vehicles or to vehicles belonging to others where a company employee or a company vehicle is involved,
  - v) Incidents causing environmental damage (chemical spills, etc),
  - vi) Incidents where company property is lost, stolen, destroyed or damaged, or
  - vii) Near-miss incidents that could have resulted in any of the above.

### **2) EMPLOYEE RESPONSIBILITY FOR REPORTING INCIDENTS:**

- a) Each employee is responsible to ensure that any undesirable incident that he or she witnesses or is involved in is reported.

### **3) INCIDENT INVESTIGATION:**

- a) Identify the Undesirable Incident:
  - i) The company employee, whether management or worker, who first becomes aware of an undesirable incident is responsible to inform the appropriate manager about the incident.
    - (1) This may be done in person, verbally,
    - (2) It may be done in a telephone conversation, or
    - (3) It should be done in writing, on a "Near Miss / Incident Report Form".
- b) Investigate the Circumstances Causing the Incident
  - i) All Undesirable Incidents must be investigated to the degree that is appropriate, based on an informal assessment of the potential that the incident had to harm people or property.
    - (1) Where the potential for harm is great, either in terms of likelihood of occurrence or severity of consequences, the level of investigation activities must be increased.
  - ii) The responsibility to initiate the investigation process lies with the manager or supervisor in charge of the area where the incident occurred.
    - (1) There is nothing to preclude this manager from requesting help from the Safety Coordinator or others within the organization.

- iii) Over-view of the Investigation and Corrective Action Process:
  - (1) Investigator's Responsibilities:
    - (a) The manager or supervisor in charge who is most directly involved in the undesirable incident will be responsible to:
      - (i) Determine the degree of investigation necessary, based on the type and criticality of the issue.
      - (ii) Investigate the incident to the appropriate level and complete and communicate the appropriate incident report form.
      - (iii) Decide upon the necessary corrective action,
      - (iv) Implement the appropriate corrective actions,
      - (v) Where necessary, coordinate the effectiveness verification of the corrective action by arranging with / delegating someone else to investigate to ensure the effectiveness of the corrective actions, and
      - (vi) Close the record of action items.
- c) Determine / Report the Appropriate Corrective Action:
  - i) The investigator is expected to identify and report the details of all actions necessary to correct the undesirable situation.
- d) Approve the Corrective Action Plan
  - i) One of the primary reasons that the manager or supervisor is expected to initiate the investigation is that he or she is usually the individual that is both responsible and capable of approving and initiating the necessary corrective actions.
  - ii) When the investigation has identified a corrective action plan, the investigator is expected to initiate the corrective actions, either by
    - (a) instructing personnel to carry out the action,
    - (b) requesting corrective action by contacting the manager, or
    - (c) requesting approval of corrective action that is not within the investigator's scope of authority.
- e) Implement the Necessary Corrective Action:
  - i) Once the necessary corrective actions are identified, the manager in charge of the investigation must ensure that the necessary action is carried out.
  - ii) The actions must be initiated as soon as practicable.
  - iii) Report the Circumstances:
    - (1) The investigation process includes measures to:
      - (a) Document the causes, recommendations and follow-up to the investigation
      - (b) Distribute this information to appropriate parties

(c) Verify that the corrective action was taken and that it was effective.

**4) REPORT / INVESTIGATION DOCUMENTATION:**

- a) Documentation used:
  - i) A “First Aid Record” shall be completed by the first aider who administered the first aid.
  - ii) An “Incident Record” shall be completed by the employee who was involved in the undesirable incident or undesirable incident that had any potential for harm.

**5) WORKER INVOLVEMENT IN INVESTIGATIONS**

- a) The investigator shall always discuss the incident and its causes with the injured worker and any other workers that were involved or who can provide useful information.

**6) ROOT CAUSE / APPROPRIATE CORRECTIVE ACTION:**

- a) The investigator is to focus on the necessity to identify both the direct and the root causes of all incidents that are investigated.
- b) All contributing causes should be addressed by the development of appropriate corrective action(s).
- c) The investigator shall not attach blame to the activities of any person involved in the incident, nor shall they report recommend disciplinary action. (The decision to impose disciplinary action is a management decision that must be based on the facts of the situation viewed in conjunction with several other factors. Disciplinary action is not within the scope of the investigation process)

**7) MANAGEMENT / SUPERVISORS RESPONSIBILITY TO INVESTIGATE:**

- a) Both regulations and the Partnerships audit standards require that management must lead the investigation process.
- b) When the situation warrants, the responsible manager may request assistance in the investigation process from other employees in the workforce.

**8) REVIEW OF INVESTIGATION REPORTS:**

- a) It shall be the responsibility of each investigating manager to forward a copy of the completed investigation report to the Safety Coordinator. The Safety Coordinator shall:
  - i) review all investigation reports generated,
  - ii) determine that appropriate direct and root causes are identified,
  - iii) approve or reject recommended corrective actions, while ensuring that all identified causes are dealt with appropriately, and
  - iv) ensure that appropriate corrective actions are taken.





- v) file the completed investigation report

**9) INCIDENT COMMUNICATION, TRACKING AND ANALYSIS**

- a) The investigating manager will notify the Safety Coordinator about each incident as soon as practicable.

**10) CORRECTIVE ACTION CLOSURE:**

- a) All approved corrective actions shall be implemented in a timely manner.
- b) The Office Manager shall be assigned the duty of tracking the closure of corrective actions and recording the closure in a file with the completed investigation report.

## **Section 8 - Program Administration**

### **1) COMMUNICATION OF HEALTH AND SAFETY ISSUES**

- a) Toolbox/Pre Job meetings
  - i) Short, relevant Toolbox Meetings are held in each crew to allow supervisors/management to communicate directly with all employees. These meetings are to be held, at the discretion of the Supervisor or Foreman. Action items from these meetings will be submitted to the Safety Coordinator to ensure follow thru.
- b) Open Door Policy
  - i) Management pursues an open-door policy with respect to employees. All are encouraged to approach management on any issue, including, but not limited to safety concerns.
  - ii) The immediate supervisor needs to be informed of the intent to proceed to the next level of supervision.
- c) Follow-up on Health and Safety Issues
  - i) All health and safety items that are brought to the attention of management by workers are to be recorded and appropriate corrective actions are to be determined and tracked to completion.
  - ii) Management is expected to provide feedback on all issues brought forward by employees. This feedback may be provided individually, in meetings or posted on the "Safety Board" as appropriate to the situation.

### **2) CONTRACTOR SAFETY COMMUNICATION**

- a) Contractor health and safety communication and control procedures are discussed in the "Contractor Package".

### **3) MANAGEMENT PARTICIPATION IN SAFETY MEETINGS:**

- a) Toolbox Meetings:
  - i) This meeting is called and led by a foreman, supervisor or management representative.

### **4) MEETING RECORDS:**

- a) Records shall be retained of all toolbox meetings. The records shall include the names of employees attending the meetings as well as an outline of the issues discussed.

**5) PROGRAM RECORDS**

- a) Records relating to all aspects of the OH&S Program shall be kept for a minimum of three years.

**6) HEALTH AND SAFETY STATISTICS**

- a) Records relevant to undesirable incidents, corrective actions and preventive actions will be reviewed and analyzed regularly (at a minimum, annually) for the purpose of identifying trends or patterns and to help identify program needs.

**7) PROGRAM AUDITS**

- a) An annual health and safety program audit is to be conducted to ensure the company is maintaining the program and for the purpose of maintaining its' Certificate of Recognition.
- b) Certifying Partner audit standards require that a trained internal auditor that is authorized by the Certifying Partner shall conduct the annual audit.

**8) ACTION PLANS**

- a) Action shall be taken to correct all deficiencies identified through the audit process.
- b) An action plan will be developed after each audit. The plan shall include:
  - i) The issue,
  - ii) The planned action,
  - iii) The target date for completion
  - iv) The person / people responsible to carry out the action, and
  - v) The actual corrective action completion date.

**9) IMPLEMENTATION OF ACTION PLANS**

- a) All program deficiencies that result in recommendations and suggestions being brought forward in an internal or external audit report shall be corrected as soon as possible.
- b) Identified deficiencies that are determined to cause any Division of Louvec Contracting to fail to meet the Partnerships audit standard shall be corrected.
- c) Recommendations or suggestions that would result in any Division of Louvec Contracting exceeding the Partnerships audit standard may be acted upon at the discretion of management.

## **Section 9 – Joint Worksite Health and Safety Committees (HSC) and Health and Safety Representative (HSR)**

### **1. JOINT WORKSITE HEALTH AND SAFETY COMMITTEE:**

- a. Louvec Contracting Ltd. (LVC) is not required by legislation to have an HSC, as LVC employs less than 20 employees and work never exceeds 90 days or more.

### **2. HEALTH AND SAFETY REPRESENTATIVE:**

- a. Louvec Contracting Ltd. (LVC) is not required by legislation to have an HSR, as LVC's work never exceeds 90 days or more.
- b. However, as LVC does employ 5-19 workers it is in good practice to appoint a HSR any ways.
- c. Health and Safety Representative Policy shall include the following:
  - i. Selection/Appointment
  - ii. Terms of office
  - iii. Training requirements
  - iv. How to report health and safety concerns
  - v. How to make recommendations to management
- d. Health and Safety Representative Duties include the following:
  - i. the receipt, consideration and disposition of concerns and complaints respecting the health and safety of workers;
  - ii. participation in the identification of hazards to workers or other persons arising out of or in connection with activities at the work site;
  - iii. the development and promotion of measures to protect the health and safety of persons at the work site and checking the effectiveness of such measures;
  - iv. cooperation with an officer exercising duties under the OHS Act, the regulations and the OHS code;
  - v. the development and promotion of programs for education and information concerning health and safety;
  - vi. the making of recommendations to the employer, prime contractor or owner respecting the health and safety of workers;
  - vii. the inspection of the work site at regular intervals;
  - viii. the participation in investigations of serious injuries and incidents at the work site in accordance with *section 40 of the OHS Act*;
  - ix. the maintenance of records in connection with the receipt and disposition of concerns and complaints and the attendance to other matters relating to the duties of the HSR;



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- x. such other duties as may be specified in the OHS Act, the regulations and the OHS code.

## **Section 10 – Other Parties at or in the Vicinity of the Work Site**

### **1. PROCESS TO ADDRESS THE PROTECTION OF OTHERS:**

- a. Protection of Others' Policy shall include the following:
  - i. Protections of Contractors/ Sub Contractors
  - ii. Protection of Visitors
  - iii. Protection of Public Near the Vicinity
- b. Evaluation Process for selecting Other Employers and Self-employed persons:
  - i. Each employer or self-employed person must be willing to abide by the Louvec Contracting Ltd. Health and Safety Manual.
  - ii. Contractors will be given a copy of the Louvec Contracting Ltd. Health and Safety Manual.
  - iii. Agreeing to the abide by the Louvec Contracting Ltd. Safety Manual will be done in writing, by signing the Contractor package.
  - iv. If the employer or self-employed persons refuse to sign, then they will not be eligible to work for or on Louvec Contracting Ltd. Jobs and sites.
- c. Monitoring of Other Employer or Self-employed persons:
  - i. Use of Louvec Contracting Ltd. FLHA's or similar will be handed into the safety Coordinator after job completion.
  - ii. Safety Coordinator may visit job sites sporadically to ensure other Employers and Self-employed persons are following the Louvec Contracting Ltd. Health and Safety Program.
  - iii. If the Safety Coordinator finds non-compliance with the Louvec Contracting Ltd. Health and Safety program then at the discretion of the Safety Coordinator they may have the chance to comply immediately, the job may be shut down until they are able to comply or lastly, the may be terminated from the job.
- d. Orientations:
  - i. Visitors- Must sign in at the office or check in with the Foreman at the jobsite where they can be briefed on the hazards of their location.
  - ii. Other Employers and Self-employed persons- Must read the Louvec Health and Safety Manual and sign the Contractor Package, agreeing to abide by this manual.
- e. Communication:
  - i. Health and Safety Manual- The Louvec Contracting Ltd. Health and Safety Manual is given to every Other Employer and Self-employed persons prior to work commencing.



- ii. If the Other Employer or Self-employed persons is doing work at the jobsite in conjunction with the Louvec Contracting employees then, they will have to be involved in the Louvec Contracting employees FLHA meeting and sign this FLHA.
- iii. If the Other Employer or Self-employed persons is doing their work without any Louvec Contracting employees onsite, then they must fill out their own or a Louvec Contracting FLHA and submit it to the Safety Coordinator after the job is complete.