



# Scuka Construction Occupational Health & Safety Manual

2025

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# 1.0 Leadership and Responsibilities

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## 1.1 Health and Safety Policy

Our health and safety policy objectives are to ensure that management, supervisors, workers, clients, and subcontractors work in a spirit of teamwork and cooperation to maintain a functioning and effective safety program. Scuka Enterprises Ltd. (Scuka) is committed to providing a safe and healthy work environment. In recognition of the right to work in a safe and healthy environment, Management will provide ongoing review and maintenance of our comprehensive program.

Our health and safety program goals working in conjunction with OH&S legislation, as amended, are adopted into our policies and procedures. Our policies aim to prevent injuries, illness, accidents, and property damage while upholding a high standard of quality in our projects. The health and safety policies offer a consolidated set of rules, safe work practices and procedures to present direction and guidance that will govern the performance of everyone working with Scuka Enterprises Ltd.

The established safe work practices and procedures guide workers on the best methods for performing high-risk activities and critical tasks. This approach is an integral part of our injury and incident prevention strategies. Company rules define clear safety expectations and are enforced consistently on all Scuka Jobsites. All management, supervisors, workers, clients, and subcontractors must participate in health and safety activities and work at a minimum in compliance with company rules and OH&S legislation.

Scuka Enterprises Ltd. established guiding principles to inspire responsibility and accountability for all work parties on our Jobsites.

## 1.2 Guiding Principles

- **Teamwork and Cooperation.** To work collaboratively with all parties to achieve a high level of quality is an integral element of our health and safety program.

- **Training and Certification.** To provide ongoing training and certification for Scuka employees.
- **Leadership and Integrity.** To provide a high level of responsibility and promotion of a safety culture is key to developing and maintaining positive attitudes towards safety in all areas.

### 1.3 Leadership and Responsibility

#### Management is responsible:

- To conduct an annual review, and regularly update our health and safety policy.
- To provide ongoing maintenance of our comprehensive and functioning health and safety program.
- To train supervisors, workers and subcontractors about their roles and responsibilities as established by our health and safety program.

#### Supervisors are responsible:

- To read, understand and implement all policies and procedures within our health and safety program.
- To post our signed health and safety policy on all Jobsites.
- To train and supervise the workers, subcontractors and visitors to ensure that the company rules, safe work practices and procedures are followed.
- To report and consult with management, workers and subcontractors about all safety concerns and Jobsite activities.

#### Workers, Subcontractors, and Visitors are responsible:

- To read, understand and comply with company policies, rules, OH&S regulations, safe work practices, and safe job procedures.
- To report all unsafe acts and conditions on Scuka Jobsites.



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**Gary Kossowan - Chief Operations Officer**

**Scuka Enterprises Ltd.**

**January 24, 2025**

## 1.4 Definitions

**"Owner"** is a company or person responsible for the land or premises that is being developed.

**"Management"** is people who have some level of authority, responsibility and authority within a company.

**"Employer"** is a company or person who engages people to perform work or services for which compensation is given in payments. The employer advises in operations through the project's planning, execution and completion.

**"Manager"** is an employee of a company responsible for planning, directing, and supervising a group of workers employed by the same company.

**"Supervisor"** is a person who instructs, directs, and supervises workers in the performance of their duties.

**"Worker"** is a person who works under a written or verbal contract of employment which can be full-time, part-time or an apprenticeship.

**"Multiple-Employer Workplace"** is a workplace where workers of two or more employers are working at the same time.

**"Prime Contractor"** is the directing contractor and employer who enters into a written agreement with the owner of that workplace to be the general contractor.

**"Subcontractor"** is a person or company under contract with the Prime Contractor to perform a service or specialty work.

**"Supplier"** is a person or entity that is the source of goods or services.

**"Visitor"** is a person who visits a Jobsite for a short amount of time and does not work for the Prime Contractor.

## 1.5 Responsibilities and Accountabilities

### Owner

Owners are responsible for ensuring the health and safety of all workers on their land or premises. Owner will:

- Maintain the land or premises to ensure the health and safety of all parties at the workplace.
- Give the prime contractor or employer the information known to the owner necessary to identify and eliminate or control hazards.
- Comply with the Scuka company rules and policies in conjunction with all OH&S regulations.

### Management

Management is committed to providing leadership and accountability by consistently implementing Scuka's OH&S Program on all Jobsites.

Management will:

- Ensure the health and safety of all Scuka Enterprises Ltd. employees, subcontractors, visitors and the public.
- Establish and implement an Occupational Health and Safety Program that exceeds the safety standards within the OH&S Regulations.
- Read, understand and comply with the Workers Compensation Act and OH&S Regulations.
- Ensure the Act and OH&S Regulations are accessible to workers on all Jobsites.
- Assume responsibility to maintain the land or premises to ensure workers' health and safety at the workplace.
- Educate and inform all employees, subcontractors and visitors of all health and safety hazards to which they may be exposed by their work or entry into the Jobsite. Promptly implement control measures to mitigate any hazardous workplace conditions on Scuka Jobsites.
- Ensure that regular inspections are made of all workplaces, including buildings, structures, grounds, excavations, tools, equipment, machinery and work methods and practices, at intervals that will prevent the development of unsafe working conditions.
- Provide and maintain in good condition personal protective equipment, first aid supplies and equipment and protective clothing.
- Educate and inform supervisors and workers of their rights and duties under the OH&S Regulations, including the right to refuse, the right to participate and the right to know.
- Provide on each workplace first aid equipment, supplies, facilities, first aid attendants, and transport to the hospital for medical treatment.
- Provide to Scuka Enterprises Supervisors and Workers with the information, instruction, training, and supervision necessary to ensure the health and safety of all workers, subcontractors and visitors to the Jobsite.
- Consult and cooperate with representatives of the Joint Occupational Health and Safety Committee. Respond in writing to all safety recommendations developed by the JHSC.
- Cooperate with the Board and officers who carry out a duty under the OH&S regulations.

### Supervisor

A supervisor instructs, directs, and guides workers in the performance of their duties and behaviour on the Jobsite. Supervisors are committed to ensuring healthy and safe work conditions are maintained in their assigned work area.

The Supervisor will:

- Ensure the health and safety of all workers under their direct supervision.
- Be knowledgeable about OH&S Regulations applicable to the work being supervised.
- Read, understand and implement all policies and procedures within our health and safety program.
- Ensure workers are using Scuka Safe Work Practice and Safe Job Procedures.

- Understand and abide by the Worker's Rights: the Right to Refuse, The Right, Participate, and The Right to Know.
- Ensure all hazards are identified, analyzed, and control measures are in place to mitigate the hazard and minimize the risk of incident.
- Perform daily, weekly and monthly workplace inspections.
- Ensure the required personal protective equipment, which is being used properly, regularly inspected, and maintained.
- Consult and cooperate with the joint committee or worker health and safety representative for the workplace.
- Cooperate with officers of the Board who are carrying out a duty under the OH&S regulations.

### Workers

Workers are responsible and accountable to follow Scuka Enterprises Ltd. Health and Safety Program.

The Worker will:

- To read, understand and abide by company rules, OH&S regulations, safe work practices, and safe job procedures.
- Take reasonable care to protect the health and safety of themselves and all workers on the Jobsite.
- Report all unsafe acts and conditions on the Jobsite, including unsafe behaviour, lack of PPE, unsafe use of equipment, job processes, lack of training and the workplace environment.
- Use personal protective equipment, devices and protective clothing as required by the OH&S Regulations and Scukas Health and Safety Program.
- Not engage in horseplay or inappropriate behaviour that may endanger the Worker or any other personnel.
- Comply with Scukas' Impairment Policy and arrive and remain Fit for Duty and not impaired by alcohol, drugs or other causes.
- Report safety concerns to the JHSC representative and cooperate with all recommendations to improve the safety culture.
- Cooperate with officers of the Board who are carrying out a duty under the OH&S regulations.

### Subcontractor

The Subcontractor is responsible and accountable to follow Scuka Enterprises Ltd. Health and Safety Program.

The Subcontractor will:

- Read, understand and comply with all company rules, OH&S regulations, safe work practices, and safe job procedures applicable to their work.
- Provide their company Health and Safety Manual and Safework Practices and Safe Job Procedures to the Company Safety Manager before the job's start date.
- Designate a Site Supervisor or Head of Trade to attend meetings and communicate with Scuka Supervisors.

- Arrive ready to work with all required certifications, plans, permits and forms applicable to their job duties.
- Ensure training certifications are current, i.e. fit test, fall protection, and equipment training specific to their task.
- Participate in a site-specific safety orientation for each Scuka Jobsite.
- Provide Safety Data Sheets for all chemicals brought to the worksite.
- Attend weekly Head of Trade and Safety meetings.
- Ensure Field Level Hazard Assessments are completed daily at morning toolbox meetings.
- Use all personal protective equipment required to perform your task. Inspect all PPE regularly to ensure they are in good condition.
- Report all unsafe acts and unsafe conditions to Scuka Supervisors.
- Report safety concerns to the JHSC representative and cooperate with all recommendations to improve the safety culture.
- Cooperate with officers of the Board who are carrying out a duty under the OH&S regulations.

## Supplier

The Suppliers are responsible and accountable for providing the owner with all necessary information regarding the product or equipment supplied.

The Supplier will:

- Classify hazardous products and prepare and provide labels and SDSs.
- Provide supplier labels on all containers of hazardous products they sell or produce.
- Ensure that any tool, equipment, machine, or device, or any biological, chemical or physical agent supplied is safe when used under the directions provided by the Supplier and complies with the OH&S Regulations, the Hazardous Products Act and the Transportation of Dangerous Good Act.
- Provide directions for the safe use of any tool, equipment, machine, or device, or any biological, chemical, or physical agent to be used at a workplace by workers,
- Ensure that any biological, chemical or physical agent supplied is labelled in accordance with the applicable federal and provincial enactments.
- Maintain compliance with the OH&S Regulations if the Supplier has responsibility under a leasing agreement to maintain any tool, equipment, machine device or other in a safe condition.
- Comply with WorkSafeBC Regulations and any applicable orders.

## Visitor

Scuka Enterprises Ltd will ensure the health and safety of visitors on our Jobsites.

The Visitors will:

- Sign in and report to the site office. The sign-in process includes their name, company, date, time of entry and exit.
- Participate in a site-specific safety orientation for each Scuka Jobsite.
- Read, understand and comply with all company rules, OH&S regulations, safe work practices, and safe job procedures applicable to their visit.

- Wear all required personal protective equipment while on the Jobsite.

## 1.6 Documentation Review Program

### Health and Safety Policy

The Health and Safety Policy must be reviewed annually. The following items are assessed:

- Ensure it is compliant with the Occupational Health and Safety Regulation and the Canada Labour Code.
- Ensure any changes to the company are updated.
- The Joint Health and Safety Committee (JHSC) has a chance to read, review and approve the policy.
- Dan Scuka has read, approved and signed the policy.
- The signed policy is posted on all Jobsites, at the Head Office and in Health and Safety Manuals.

### Health and Safety Manual

The Health and Safety Manual is reviewed annually. In addition, the Manual is updated to ensure compliance with the Occupational Health and Safety Regulation and the Canada Labour Code.

### Posted Documentation

Documentation is posted in the Head Office, Site Offices and sign-in booths. The following documents must be posted:

Health and Safety Policy	Route to the Hospital
Notice of Project	Emergency Response Plan
Site Safety Plan	First Aid Assessment
Directions to Nearest Walk in Clinic	Emergency Contacts
Fire Safety Plan and Map	JHSC Minutes
Worksafe Notices to Workers (PL9 & 29)	WorksafeBC Inspection Reports

## 1.7 Documentation Filing System

All documentation collected during the work process is stored for seven years as recommended by the Government of Canada. Documentation is held at the Head office and on the Procore Construction Management System.

Current documentation is kept in the Jobsite in the Site Office. First-Aid records are kept in a locked cupboard as per the Freedom of Information and Protection of Privacy Act.

## 1.8 Reference Information

### Workers Compensation Act

Part 2 Division 1, Sections 13 through 15 Interpretation and Purposes; Part 2, Division 4, Sections 21 through 30 - General Duties of Employers, Workers and Others.

### Occupational Health and Safety Regulations

Part 3 - Rights and Responsibilities, Sections 3.1 to 3.3 – Occupational Health and Safety Programs.

#### **Canada Labour Code**

Canada Labour Code R.S.C., 1985, c. L-2, Part 2, sections 124 and 126, section 136.

## 2.0 Hazard Assessment and Control

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### 2.1 Policy

Scuka Enterprises Ltd. (Scuka) believes that an effective safety program depends on building workers' skills, abilities, and motivation for safety. A comprehensive Workplace Hazard Assessment and Control Process is the heart of an effective health and safety program. Through training, supervision, and written instruction, workers can identify, assess and control the hazards at the Jobsite. Scuka educates and informs all employees, subcontractors, and visitors of all health and safety hazards they may be exposed to by their work or entry into the Jobsite.

Our Workplace Hazard Assessment and Control Process consists of all steps and tools necessary to protect workers from exposure to hazards on the Jobsite. The Hazard Assessment Tools described in this manual ensure hazards are identified, assessed, and controlled throughout the entire project. The hierarchy of controls is implemented to control hazards and alleviate the risk of injury, illness or property damage. Scuka has a duty of Due Diligence and is responsible for taking all reasonable precautions to prevent injuries or accidents in the workplace. We aim to promptly mitigate any hazardous workplace conditions to ensure a safe and healthy work environment.

### 2.2 Definitions

**"Hazard"** is any source of potential damage, harm or adverse health effects on something or someone.

**"Risk"** is the chance or probability that a person will be harmed or experience an adverse health effect if exposed to a hazard. It may also apply to situations with property or equipment loss or harmful impact on the environment.

**"Critical Task"** is a high-risk task that can produce significant loss to people, equipment, process or the environment.

**"High-Risk"** is a task more likely than others to cause disease, injury property damage.

**"Hierarchy of Controls"** is a five-step process to controlling hazards.

**"Field Level Hazard Assessment"** (FLHA) is an evaluation completed before work commences at a Jobsite. It is a daily assessment of job tasks, hazards and control measures.

**"Job Safety Analysis"** (JSA) is a safety tool used to define and control hazards associated with a specific process, job, or procedure.

**"Due Diligence"** requires that an employer or company provide safe work conditions by taking reasonable steps to prevent incidents from occurring.

### 2.3 Responsibilities

Management is responsible to:

- Read and understand the governing regulations to ensure all hazards are being addressed in the hazard identification, assessment, and control processes.
- Create and facilitate a comprehensive hazard assessment and control process.
- Educate and train Supervisors, Workers and Subcontractors on the hazard identification, assessment and control process and tools.
- Ensures all Jobsites have the hazard assessment tools and are successfully controlling the hazards on site.
- Develop and train Supervisors and Workers on Safe Work Practices and Safe Job Procedures for all Critical Tasks.
- Provide certifications and training to all Scuka employees.
- Ensure Subcontractors have the required training and certification for their job tasks.
- Implement a Joint Health Safety Committee to discuss incidents and hazard trends.

#### **Supervisors are responsible to:**

- Read, understand and implement the hazard assessment and control process on the Jobsites.
- Facilitate the hazard identification, assessments and control process with workers before commencing work each day. Select the appropriate hazard control tool, including FLHAs, JSAs, permits, plans and forms. Post all required paperwork to the Site Safety Board.
- Ensure the hierarchy of controls is implemented to mitigate hazards identified. Then evaluate the control measures in place for effectiveness and then reassess the hazards.
- Update and maintain the High-Risk whiteboard at Gate 1 sign-in booth to notify workers, subcontractors and visitors of critical tasks.
- Perform site-specific orientations to inform all new workers and visitors of the company rules and hazards on the Jobsite.
- Read, understand and ensure compliance with Safe Work Practices and Safe Job Procedure.
- Conduct weekly Head of Trade and Safety Meetings to discuss hazards on the Jobsite and set clear expectations for safety.
- Participate in the Joint Health Safety Committee to ensure all hazard and incident trends are discussed and addressed.
- Ensure all Scuka employees and trades have the certifications required for their job tasks.
- Read, understand and ensure compliance with the manufacturer guidelines for mobile equipment, equipment, power tools and air tools.
- Ensures Scuka workers are training and certified to operate tools, equipment and mobile equipment.
- Ensure all hazardous substances are identified. Train Workers to read and understand Safety Data Sheets, including safe handling procedures, PPE, disposal and first aid measures are followed.

#### **Workers are responsible to:**

- Participate in site-specific orientations to learn the hazards at each Scuka Jobsite.

- Participate in a morning toolbox meeting to identify, assess and control hazards of daily tasks. A Field Level Hazard Assessment is used in this process. Sign onto the permits and plans required to perform job tasks.
- Implement control measures promptly to mitigate the hazards and decrease the risk of injury, illness and property damage.
- Report all unsafe acts and conditions to a Scuka Supervisor.
- Read, understand and follow Safe Work Practices and Safe Job Procedure.
- Read, understand and comply with the manufacturer guidelines for mobile equipment, equipment, power tools and air tools.
- Participate in the Joint Health Safety Committee as work representatives on the Jobsites.
- Report all unsafe acts and conditions to a Scuka Supervisor.
- Read and understand Safety Data Sheets for all hazardous substances, including safe handling procedures, PPE, disposal and first aid measures are followed.

#### **Subcontractors are responsible to:**

- Submit all Safety Programs, SDSs, certifications, and Safe Work Practices before starting work on a Scuka Jobsite.
- Follow and comply with all site rules, Scuka Policy and Procedures and WorkSafeBC regulations.
- Report all unsafe acts and conditions to a Scuka Supervisor.
- Participate in site-specific orientations to learn the hazards at each Scuka Jobsite.
- Participate in a morning toolbox meeting to identify, assess and control hazards of daily tasks. A Field Level Hazard Assessment is used in this process and must be completed and submitted by the Subcontractor. Subcontractors must also sign onto permits as required to perform job tasks.
- Implement control measures promptly to mitigate the hazards and decrease the risk of injury, illness and property damage.
- Read and understand Safety Data Sheets for all hazardous substances, including safe handling procedures, PPE, disposal and first aid measures are followed.

#### **Visitors are responsible to:**

- Sign in and report to the site office.
- Participate in a site-specific safety orientation for each Scuka Jobsite.
- Read the High-risk whiteboard and learn the hazards and control zones.
- To read, understand and comply with all company rules, OH&S regulations, safe work practices, and safe job procedures applicable to their visit.
- Wear all required personal protective equipment while on the Jobsite.

## **2.4 Hazard Identification, Assessment and Control**

The hazards and potential consequences are systematically controlled by a process called Hazard Identification, Assessment and Control Process. The following sections encompass the processes and tools to alleviate hazards and minimize risk to employees, workers, visitors and the public. The process has three steps which include identification of hazards, assessment of

the degree of risk and consequences on exposure and control measures in place to mitigate the hazards

### 2.4.1 Step 1: Identification

The hazard identification process finds the source of a hazard, the type of hazard and the consequences, impact or harm caused by a hazard.

**Source** → **Hazard** → **Consequences**

#### Source of Hazards

Scuka Enterprises Ltd. hazard identification process analyzes but is not limited to the following sources; people, equipment, environment, materials, and processes to discover the source of a hazard.

1. **People** can cause hazards by being inexperienced or young, bringing viruses, using poor ergonomics when performing a task, bullying and violence, and unsafe acts. People include employees, subcontractors, visitors, inspectors, and the public.
2. **Equipment** includes mobile equipment, hand tools, power tools and air tools, heaters and air conditioners, ladders, scaffolding, fans, temporary power, and company vehicles.
3. **Environment** hazards include weather, location, time of day and light, and Jobsite conditions.
4. **Materials** are any workplace substance, matter, or provisions used in the building process, including chemicals, building products and supplies, and garbage.
5. **Processes** combine people, equipment, environment, and materials in a Jobsite task to further the building process. The design, pace, and organization of various tasks are organized through policies, procedures and work processes.

From these categories, we can identify the six types of hazards: biological, chemical, ergonomic, physical, psychological, and safety.

#### Types of Hazards

Scuka assesses six types of hazards:

1. **Biological** hazards include bacteria, fungi, viruses, insects, plants, birds, animals, and humans.
2. **Chemical** hazards depend on the chemical or substance's physical, chemical and toxic properties, routes of entry, and duration of exposure.
3. **Ergonomic** hazards include body position, repetitive movements, lifting and carrying, vibration, hand and foot placement, lighting, work schedule, and improper set up of workstation,
4. **Physical** hazards include confined spaces, working at heights, high voltage above and below, weather and temperature extremes, pressure extremes, noise, poor ventilation, and air quality.
5. **Psychosocial** hazards include stress, bullying, violence, personal and professional relationships, fatigue, family responsibilities, mental illness, work schedule, and life and balance.
6. **Safety** hazards include scraps and garbage removal, improperly stored materials, delivery of materials, inappropriate machine guarding, rotating and moving machinery,

equipment malfunctions or breakdowns, poor maintenance and no guardrails, extension cords and temporary power.

### **2.4.2 Step 2: Hazard Assessment and Prioritization**

Hazard assessment is an analytical technique that examines the identified hazards to determine the risk of injury, illness, death and property damage. When assessing the level of risk, you must understand the accepted norms to judge the situation. The following list contains laws, standards, guidelines and codes used to compare hazardous conditions:

Occupational Health and Safety Regulation, Guidelines and Policies.

BC Fire Code.

BC Building Codes.

Canada Labour Code.

CSA Standards.

Hazardous Products Act.

Manufacturers' and suppliers' Instructions, manuals and safe practices.

### **Risk/Hazard Assessment**

Risk assessment is the overall process or method to identify hazards and risk factors that have the potential to cause harm. The process encompasses hazard identification and assessment to evaluate the risk of injury, illness and property damage. A risk assessment is a thorough look at the Jobsite to identify the source and type of hazards that may cause harm, particularly to the workers. After identification is made, the hazards are analyzed to assess the probability of ill effect and the impact of exposure. When the impact is determined, the priority of control is established. High-risk hazards are controlled first. A risk/hazard assessment is conducted before construction starts on a new project, when a new work process is introduced, when a work process or operation changes, and at other practicable intervals so that hazards are identified before they cause harm. One common hazard assessment that is done daily is the field level hazard assessment discussed below. On active sites a daily inspection also occurs. On less active sites a weekly inspection occurs. The hazard assessment process is always an ongoing one. Both workers and managers participate in the hazard assessment process. Management will monitor and support the hazard assessment process and will as a general practice sign off on all daily Field Level Hazard Assessments.

The Risk Assessment tool analyses each high-risk critical task for source, type and impact of exposure. The overall process of this tool is hazard identification, risk analysis, and prioritization of control measures. The rating system prioritizes the hazards from highest to lowest risk. The risk assessment uses a qualitative analysis by multiplying the probability of an incident and the impact on people and the environment. The tasks with the highest rating are controlled first as they will result in the most significant consequences.

## Critical Tasks

Scuka Enterprises Ltd. completes a WorkSafeBC Construction Checklist to determine the high-risk tasks and ensure compliance with governing regulations and guidelines. All high-risk tasks that are commonly performed on Scuka Jobsites are a part of the critical task list. The critical task list is an inventory of high-risk jobs that require a particular form, plan and or permit to complete. A critical task is a high-risk task that can produce significant loss to people, equipment, process or the environment. This tool supports Scuka Supervisor in finding the required documentation, OH&S regulations and guidelines.

**Critical Task List:**

Working at Heights	Asbestos
Scaffolding	Demolition
Ladders	High voltage power lines
Mobile Equipment Operation	Traffic Control
Confined Space	Excavation and Trenching
Crane Operation	Silica Dust

**Field Level Hazard Assessments**

A Scuka Field Level Hazard Assessment (FLHA) is completed each morning as part of a morning Toolbox meeting. The FLHAs are completed to ensure that hazards are identified, assessed and controlled before commencing work. Scuka workers and Managers participate jointly in this process. Scuka Workers and Managers sign the FLHA. All Subcontractors are required to fill out a Field Level Hazard Assessment when working on a Scuka Jobsite. The tasks and conditions are discussed and analyzed for hazards. The hazards are rated using the Risk Matrix, which evaluates frequency and severity. Frequency refers to how often workers are exposed to a hazard. The greater the frequency, the greater the priority in controlling the hazard. Severity refers to how severe an injury could be if the hazard caused harm. The greater the severity, the greater the priority in controlling the hazard. Control measures are then discussed and established to ensure the safety of all tasks are safe, and hazards are mitigated.

Hazard assessment tools are used to assess all aspects of the work of Scuka Enterprises Ltd. The Head Office has daily informal assessments and one formal monthly assessment that ensures the Office employees work safely in a hazard-free environment. The Upper Garage and Storage area are informally assessed for hazards when Scuka employees pick up and drop off tools. They report all deficient tools, equipment and machinery and tag them out. Repairs are made before equipment is used on other projects.

The table below provides a graphical representation of the ratings given on hazard assessments.

Severity Calculation				
Probability of Occurrence	4. Very Hazardous	3. Hazardous	2. Low Risk	1. Very Low Risk
<b><u>4. Very Likely</u></b>	16 Severe Risk	12 Severe Risk	8 Very Risky	4 Low Risk
<b>3. Likely</b>	12 Severe Risk	9 Very Risky	6 Moderate Risk	3 Low Risk
<b>2. Possible</b>	8 Very Risky	6 Moderate Risk	4 Low Risk	2 Low/No Risk

1. Not At All Likely	4 Moderate Risk	3 Low Risk	2 Low/No Risk	1 Low/No Risk
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The table below sets out an alternate assessment system that may be used in some older Scuka Hazard Assessment documents:

Frequency of task or exposure	Severity of Occurrence				
	A. Trivial	B. Minor	C. Moderate	D. Major	E. Extreme
(1) Quarterly	A 1 Low Risk	B 1 Low Risk	C 1 Low Risk	D 1 Medium	E 1 Medium
(2) Monthly	A 2 Low Risk	B 2 Low Risk	C 2 Medium	D 2 Medium	E 2 Medium
(3) Weekly	A 3 Low Risk	B 3 Medium	C 3 Medium	D 3 High	E 3 High
(4) Daily	A4 Medium	B 4 Medium	C 4 Medium	D 4 High	E 4 High
(5) Hourly	A 5 Medium	B 5 Medium	C 5 High	D 5 High	E 5 High

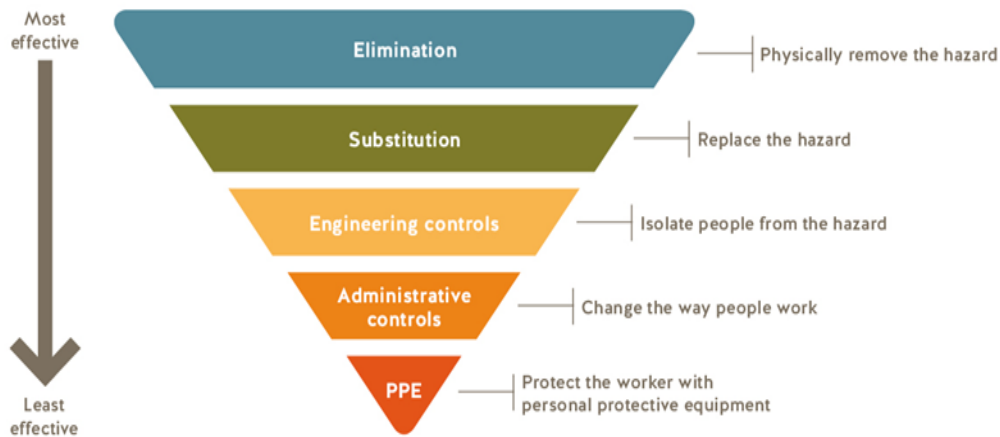
### 2.4.3 Step 3: Consequences

The consequences are the impact and harm to people, property and the environment after being exposed to a hazard. A series of risk and hazard assessments are conducted throughout the tenure of a construction project to identify, assess and develop control measures to minimize the risk of injury, illness and property damage.

### Hazard Control Process

Scuka Enterprises Ltd. uses a systematic hazard control process to establish preventative and corrective measures. The Hierarchy of Controls is a five-step process to control the hazards that have been identified, assessed and prioritized. The steps are organized from most effective to least effective.

## Hierarchy of controls



### 1. Elimination

Removing the hazard from the Jobsite is the first and most effective control measure.

### 2. Substitution

Substitute hazardous materials or machines with less hazardous ones. A different procedure, product or type of equipment can increase the chance of performing the task safely.

### 3. Engineering

Engineering controls measures include modifying work processes, equipment and materials, installing physical barriers and ventilation systems, and isolating hazards from the workers entirely.

### 4. Administrative

Administrative controls alter the way work is performed. Administrative controls include changes to the work schedule and personnel scheduling, training, housekeeping and equipment maintenance.

Development of Safe Work Practices and Safe Job Procedures is a way to ensure workers are implementing best practices when executing a critical task or using equipment or tools. Training, education and supervision can improve the safety culture on the Jobsite.

### 5. Personal Protective Equipment (PPE)

Workers must wear Personal Protective Equipment (PPE), including hard hats, high-vis vests, CSA-approved work boots and clothing appropriate to the environment and their task. Specialty PPE may also be required, and could include but is not limited to gloves, respirators, gas monitors, safety glasses and face shields, task specific boots, safety harnesses and lanyards.

## 2.5 Hazard Assessment Tools

Scuka Enterprises Ltd. uses a series of hazard assessment tools through different stages of building, the pre-construction, course of construction and post-construction. All hazard assessment tools are found in our forms binder on each Jobsite.

### Pre-construction:

#### 1. WorkSafeBC Construction Checklist

The Worksafe Construction Project Checklist is reviewed before the start of a project. This tool is filled out by the Project Manager, Company Safety Manager and Site

Superintendent. The checklist assists in identifying the high-risk tasks being performed to assist Scuka in complying with all governing regulations and guidelines.

#### 2. First Aid Assessment

A First Aid Assessment is conducted to assess the scope of work, how many workers are involved, the level of risk, and any barriers to the hospital. The criteria are used to allocate the appropriate level of First Aid Attendants and equipment. An emergency contact list, route to the hospital and route to a walk-in clinic accompanies the First Aid Assessment.

## Course of Construction:

### 3. Critical Task List

The Critical task list contains an inventory of high-risk jobs. It is organized by the task, due diligence documentation and links to the required regulations and guidelines. These jobs must have Safe Work Practices or Safe Job Procedures. See Element 3 and 4 in the Health and Safety Manual.

### 4. Field Level Hazard Assessment (FLHA)

A Field Level Hazard Assessment is completed daily by the Supervisor during the morning Toolbox Meeting. All Scuka employees attend the morning meeting and participate in this process.

### 5. Job Safety Analysis (JSA)

Job Safety Analysis is completed when a critical task has no Safe Work Practice or Procedure is developed. This tool can be used for more complicated work processes that have more than one critical task involved. The JSA analyzes the hazards by looking at the sequence of events and hazards from each step. Then control measures are developed to mitigate the hazards.

### 6. Office Hazard Assessment

A monthly inspection is performed and recorded in Procore to assess the office for hazards. Hazards Identified and assessed are promptly controlled to ensure the safety of all employees and visitors.

### 7. Garage Storage Hazard Assessment

The upper garage at the Scuka Head Office is where tools, equipment and materials are stored. Scuka personnel are responsible for dropping off and reporting any tagged out and broken tools. During this time, informal hazard assessments are performed to ensure the garage is organized, accessible and safe for all employees.

### 8. Workplace Inspections

Daily, weekly and monthly inspections are performed as necessary to inspect all aspects of the Jobsites thoroughly. See Element 9

## 2.6 Hazard Assessment Review and Approval

All methods, assessments, inspections, plans, permits and forms are reviewed, evaluated and approved by Scuka Supervisors. Due Diligence is demonstrated by confirming that the control or corrective actions were implemented and effectively eliminated the potential hazard.

## 2.7 Communication of Hazards

Scuka Enterprises Ltd. communicates and educates employees, workers, visitors of hazards on the Jobsites using several strategies.

- **Orientations.** New workers to a Jobsite participate in a Site Specific Safety Orientation. Workers are informed of critical tasks, high-risk areas, control zones and active plans or permits.

- **High-Risk Whiteboard.** A whiteboard is located at Gate 1 or the main entrance of the Jobsite. Critical tasks, high-risk areas, control zones and active plans or permits are written to inform workers of ever-changing hazards, conditions and processes.
- **Head of Trade Meetings.** All Supervisors attend a weekly head of trade meeting to discuss progress, deliveries of materials and hazards that affect the project.
- **Safety Meetings.** Weekly Safety Meetings are mandatory and attended by all employees, supervisors and workers. All safety observations and incidents are discussed. Attendees are informed of safety expectations and control measures.
- **Site Safety Board.** The Site Safety Board posts all required documentation. The board is updated with pertinent and informative information for all parties to read and understand. See Posted Documentation in Element 1.
- **Email, phone and text.** Subcontractor supervisors and owners are contacted via email, phone and text when a trade is involved in causing hazards on the Jobsite.
- **Procore.** Procore is a construction management software that connects all parties involved in the project. Safety Observations, incidents, inspections and meetings are tools within Procore that relay hazard information to Scuka employees and Subcontractors.

## 2.8 Subcontractor Management System

### Policy

Scuka Enterprises Ltd believes in cultivating a cooperative and communicative relationship with Subcontractors. A system with clear expectations for safety is established and maintained throughout the construction process. The following process is used to evaluate and monitor all subcontractors throughout the tenure of a project.

#### 2.8.1 Step 1: Pre-construction

Scuka Enterprises Ltd. requests the Safety Program, Safe Work Practices and Safe Job Procedures, certifications and WorkSafeBC Letter of Clearance. These documents are analyzed for quality to ensure it meets or exceeds Scukas Health and Safety Program and OH&S regulations and guidelines.

#### 2.8.2 Step 2: Course of Construction

Subcontractors must abide by the following safety requirements:

- Read, understand and comply with all company rules, the Workers Compensation Act, the Workers Compensation Act Occupational Health and Safety Regulation, Safe Work Practices, and Safe Job Procedures applicable to their work.
- Designate a Site Supervisor or Head of Trade to attend meetings and communicate with Scuka Supervisors. Attend weekly Head of Trade and Safety meetings.
- Respond and address all safety observations and incidents,
- Report all unsafe acts and unsafe conditions to a Scuka Supervisor.
- Participate in site-specific orientations to learn the hazards at each Scuka Jobsite.
- Participate in a morning toolbox meeting to identify, assess and control hazards associated with daily tasks.
- Use all personal protective equipment required to perform your task. Inspect all PPE regularly to ensure it is in good condition.

- Sign onto the permits, plans and forms required to perform critical tasks.
- Implement control measures promptly to mitigate the hazards and decrease the risk of injury, illness and property damage.
- Read and understand Safety Data Sheets for all hazardous substances, including safe handling procedures, PPE, disposal and first aid measures to be followed.
- Report safety concerns to the JHSC representative and cooperate with all recommendations to improve the safety culture.
- Cooperate with officers of the Board who are carrying out a duty under the OH&S regulations.

### 2.8.3 Step 3: Post Construction

Subcontractors are assessed and rated during the Post Construction Meeting. The Subcontractors are evaluated by assessing the following areas of safety:

1. Are they compliant with OH&S Regulations?
2. Are they compliant with Scuka site rules?
3. Do they fill out detailed Field Level Hazard Assessments daily and implement controls of hazards?
4. Do they report unsafe acts and conditions on the Jobsite?
5. Do they notify Scuka of Critical Tasks, then request and adhere to Job Safety Analysis, permits and plans.
6. Have they been the cause of safety observations and incidents?
7. Do they cooperate with incident investigations?
8. Do they attend all Head of Trade and Safety Meetings?
9. Do they have an onsite Supervisor that actively supervises their crew?
10. Do they have good communication with Scuka Supervisors via text, email and in-person?
11. Do they perform ongoing housekeeping to ensure their work area is clean?

The information attained by the evaluation helps Scuka Management determine the Subcontractors to work with in the future.

## 2.9 Reference Information

### Workers Compensation Act

Part 2, Division 4, Sections 21 through 30 – General Duties of Employers, Workers and Others

### WorkSafeBC Regulations

Part 3, Sections 3.1 to 3.3 – Occupational Health and Safety Programs; Part 4 General Conditions.

## 3.0 Safe Work Practices

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### 3.1 Policy

Scuka Enterprises Ltd. (Scuka) recognizes the responsibility to develop Safe Work Practices to ensure all tasks are performed in a skilled and safe manner. Safe Work Practices can be defined as a set of methods or "Dos and Don'ts" regarding using tools, equipment, or performing high-risk tasks safely. The Critical Task List must have a Safe Work Practice developed to ensure a standardized procedure is available for all Scuka employees and workers. Scuka involves supervisors, workers and specialists in the development and review of Safe Work Practices.

### 3.2 Definitions

"Safe Work Practices" can be defined as a set of methods or "Dos and Don'ts" regarding using equipment or carrying out a specific job.

"High-Risk" is a task more likely than others to cause disease, injury property damage.

"Critical Task" is a high-risk task that can produce significant loss to people, equipment, process or the environment.

### 3.3 Responsibilities

**Management is responsible to:**

- Develop Safe Work Practices for all Critical Tasks, tools and equipment.
- Train and supervise all Supervisors to implement Safe Work Practices on the Jobsite.

**Supervisors are responsible to:**

- Read, understand and execute all Safe Work Practices.
- Assist in the development of new Safe Work Practices.
- Train and supervise workers in the execution of Safe Work Practices on the Jobsite.
- Ensure Safe Work Practices are readily available to workers.
- Involve the JHSC in the development and review of Safe Work Practices.
- Supervise Scuka employees and Subcontractors to ensure Safe Work Practices are adequate and being followed.

**Workers are responsible to:**

- Read, understand and follow all Safe Work Practices.
- Recognize and identify the hazards listed in the Safe Work Practice.
- Read, understand and implement the control measures listed in the Safe Work Practice. Use all required PPE.
- Know where to find and access the Safe Work Practice Binder on the Jobsite.
- JHSC worker representatives participate in the development and review of Safe Work Practices.
- Asks the supervisor for clarification and demonstration when needed.

**Subcontractors are responsible to:**

- Submit a copy of their Safety Program and Safe Work Practices before starting a project.
- Read, understand and follow all Safe Work Practices from their Safety program.
- Follow Scukas Safety Program and Safe Work Practices if they do not have a Company Safety Program.
- Recognize and identify the hazards listed in the Safe Work Practice.
- Read, understand and implement the control measures listed in the Safe Work Practice. Use all required PPE.
- Know where to find and access the Safe Work Practice Binder on the Jobsite.
- JHSC worker representatives participate in the development and review of Safe Work Practices.
- Asks the supervisor for clarification and demonstration when needed.

**3.4 Safe Work Practices Development**

Scuka Enterprises Ltd. conducts a WorkSafeBC Construction Checklist and Risk Assessment of all critical tasks. The Critical Task List is an inventory of High-Risk activities that are performed throughout the construction process. Safe Work Practices are written to fit the scope of work in a language that your workforce can understand.

**Resources for development include:**

- Occupational Health and Safety Regulations, Guidelines and Policies.
- CSA Standards.
- Manufacturers' and suppliers' Instructions, manuals and safe practices.
- Recognize and identify the hazards listed in the Safe Work Practice.
- Safety Data Sheets for all chemicals.

**Critical Task List:**

Working at Heights	Asbestos
Scaffolding	Demolition
Ladders	High voltage power lines
Mobile Equipment Operation	Traffic Control
Confined Space	Excavation and Trenching
Crane Operation	Silica Dust

**Selecting a Team**

The team used to develop Safe Work Practices identifies job steps, potential hazards, and effective control measures.

**An effective team includes:**

- Joint Health and Safety Committee members can assist in the development and review of Safe Work Practices.
- Scuka Management and Supervisors experienced in job tasks can assist with developing an accurate Safe Work Practice.
- Scuka employees or Subcontractors who are familiar and experienced with the task can write an accurate Safe Work Practice.
- Trained and certified Scuka employees and Subcontractors can add vital information to execute the practice safely.

### 3.5 Location of Safe Work Practices

Scuka Enterprises Ltd. will ensure that all employees have access to Safe Work Practices by making them readily available at all workplace locations. Safe Work Practices are available for employees' review online and are sent to employees electronically. Safe work practises are regularly reviewed at safety meetings.

### 3.6 Reviewing Safe Work Practices

Management, supervisors and workers must review all Safe Work Practices before implementing each Safe Work Practice. The Joint Health and Safety Committee consists of management and worker representatives. Safe Work Practices will continue to be reviewed on an annual basis at the Joint Health Safety Committee.

### 3.7 Training

- All supervisors, JHSC members and workers are trained to perform the relevant Safe Work Practices for their role.
- New workers receive an onsite orientation, a copy of the company rules and a copy of the Safe Work Practices.
- JHSC is trained to create new Safe Work Practices that reflect the work performed at the Jobsite.

### 3.8 Reference Information

#### WorkSafeBC Regulations

Part 3 Rights and Responsibilities, Section 3.3 – Occupational Health and Safety Programs

## 4.0 Safe Job Procedures

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### 4.1 Policy

Scuka Enterprises Ltd. is committed to providing Scuka employees with the tools needed to safely and effectively perform their work. Safe Job Procedures is a written, specific step-by-step breakdown of a job. Scuka Enterprises Ltd. creates practical procedures, which enable workers to complete their jobs efficiently, most importantly, safely. Scuka involves supervisors, workers and skilled trades in the development and review of Safe Job Procedures. Safe Job Procedures identify the hazards the worker could be exposed to, the steps required to complete the task and the control measures.

### 4.2 Definitions

**"Safe Job Procedures"** is a written, specific step-by-step description of how to complete a job safely and efficiently from start to finish. Safe Job Procedures must clearly identify the hazards the worker could be exposed to, the steps required to complete the task and the control measures.

**"Safe Work Practices"** can be defined as a set of methods or "Dos and Don'ts" regarding using equipment or carrying out a specific job.

**"High-Risk"** is a task more likely than others to cause disease, injury property damage.

**"Critical Task"** is a high-risk task that can produce significant loss to people, equipment, process or the environment.

### 4.3 Responsibilities

#### **Management is responsible to:**

- Develop Safe Job Procedures for all Critical Tasks, tools and equipment.
- Train and supervise all Supervisors to implement Safe Job Procedures on the Jobsite.

#### **Supervisors are responsible to:**

- Read, understand and execute all Safe Job Procedures.
- Assist in the development of new Safe Job Procedures.
- Train and supervise workers in the execution of Safe Job Procedures on the Jobsite.
- Ensure Safe Work Practices are readily available to workers.
- Involve the JHSC in the development and review of Safe Job Procedures.
- Supervise Scuka employees and Subcontractors to ensure Safe Job Procedures are adequate and being followed.

#### **Workers are responsible to:**

- Read, understand and follow all Safe Job Procedures.
- Recognize and identify the hazards listed in the Safe Job Procedures.
- Read, understand and implement the control measures listed in the Safe Job Procedures. Use all required PPE.
- Know where to find and access the Safe Job Procedures Binder on the Jobsite.

- JHSC worker representatives participate in the development and review of Safe Work Practices.
- Ask the supervisor for clarification and demonstration when needed.

**Subcontractors are responsible to:**

- Submit a copy of their Safety Program and Safe Job Procedures before starting a project.
- Read, understand and follow all Safe Job Procedures from their Safety program.
- Follow Scukas Safety Program and Safe Job Procedures if they do not have a Company Safety Program.
- Recognize and identify the hazards listed in the Safe Job Procedures.
- Read, understand and implement the control measures listed in the Safe Job Procedures. Use all required PPE.
- Know where to find and access the Safe Job Procedures Binder on the Jobsite.
- JHSC worker representatives participate in the development and review of Safe Job Procedures.
- Ask the supervisor for clarification and demonstration when needed.

**4.4 Safe Job Procedures Development**

Scuka Enterprises Ltd. conducts a WorkSafeBC Construction Checklist and Risk Assessment of all critical tasks. The Critical Task List is an inventory of High-Risk activities that are performed throughout the construction process. Safe Job Procedures are written to fit the scope of work in a language that your workforce can understand.

**Resources for Development Includes:**

- Occupational Health and Safety Regulations, Guidelines and Policies.
- CSA Standards.
- Manufacturers' and suppliers' Instructions, manuals and Safe Job Procedures.
- Recognize and identify the hazards listed in the Safe Job Procedures.
- Safety Data Sheets for all chemicals.

**Critical Task List:**

Working at Heights	Asbestos
Scaffolding	Demolition
Ladders	High voltage power lines
Mobile Equipment Operation	Traffic Control
Confined Space	Excavation and Trenching
Crane Operation	Silica Dust

## Selecting a Team

The team used to develop Safe Job Procedures identifies job steps, potential hazards, and effective control measures.

### An effective team includes:

- Joint Health Safety Committee assists in the development and review of Safe Job Procedures.
- Scuka Management and Supervisors experienced in job tasks can assist with developing accurate Safe Job Procedures.
- Scuka employee or Subcontractor who is familiar and experienced with the task can write accurate Safe Job Procedures.
- Trained and certified Scuka employees and Subcontractors can add vital information to execute the practice safely.

## 4.5 Location of Safe Job Procedures

Scuka Enterprises Ltd. will ensure that all employees have access to Safe Job Procedures by making them readily available at all workplace locations. Safe Job Procedures are available for employees' review online and are sent to employees electronically. Safe Job Procedures are regularly reviewed at safety meetings.

## 4.6 Reviewing Safe Job Procedures

Management, supervisors and workers must review all Safe Job Procedures before implementing each Safe Work Practice. The Joint Health and Safety Committee consists of management and worker representatives. Safe Job Procedures will continue to be reviewed on an annual basis at the Joint Health Safety Committee.

## 4.7 Training

- All supervisors, JHSC members and workers are trained to perform the relevant Safe Job Procedures for their role.
- New workers receive an onsite orientation, a copy of the company rules and a copy of the Safe Job Procedures.
- JHSC is trained to create new Safe Job Procedures that reflect the work performed at the Jobsite.
- All Scuka employees, subcontractors and visitors are informed where to access Safe Job Procedures on the Jobsite.

## 4.8 Reference Information

### WorkSafeBC Regulations

Part 3 Rights and Responsibilities, Section 3.3 – Occupational Health and Safety Programs

## 5.0 Company Rules

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### 5.1 Policy

This Discipline policy applies to all Scuka Enterprises Ltd. employees at any of the company work location(s). Scuka Enterprises Ltd. presumes that most employees want to do a good job and will correct their behaviour provided that the expectations are clear and that they understand the consequences of non-compliance.

Scuka Enterprises Ltd. adheres to the principles of progressive discipline, which are applied using progressive steps, increasing in severity upon recurrence of misconduct. Serious offences may result in immediate suspension or termination. The following “four strike” disciplinary actions will apply to any employee who is found to be in nonconformance or non-compliance with company policy, safety rules or applicable regulations:

- Verbal Warning
- Written Warning
- Suspension (without pay)
- Termination

Should any contractor, supplier or visitor be found in nonconformance or non-compliance of company policy, safety rules or applicable regulations, Scuka Enterprises Ltd. management has the authority to revoke site privileges. Where an employee, subcontractor, supplier or visitor demonstrates conduct that causes a significant hazard to themselves or any other employee or worker, or constitutes a wilful and deliberate violation of any Scuka safety policy, this shall constitute just cause for immediate dismissal from site and from employment.

The “four strike” disciplinary action method shall be considered and utilized by Scuka Enterprises Ltd. on a case-by-case basis, according to severity of infraction, repeated involvement in offences, etc. Scuka Enterprises Ltd. Management shall enforce any disciplinary action, up to and including termination, at their sole discretion, depending on the nature of the infraction (e.g., violation of zero tolerance rules, etc.), and history of occurrence.

### 5.2 Responsibilities

#### Management

- Takes appropriate action to ensure that immediate corrective action is taken in the case of safety infractions, and
- Actively encourages all managers, supervisors, workers and contractors to comply with company, industry and government rules and regulations.

#### Supervisor

- Demonstrates a commitment to safety by following regulations and rules consistently,
- Holds workers accountable for safe performance following safety directives,
- Assists workers in understanding the need for rules and the consequences of not following established safety rules and requirements, and

- Handles worker infractions of safety rules and regulations by following the disciplinary policy.

### Worker

- Demonstrates a commitment to safety by following regulations and rules consistently.

## 5.3 General Rules

1. It is the responsibility of all employees to become familiar with their workplace and to ensure their own safety and the safety of their fellow workers.
2. Employees shall wear personal protective equipment (PPE) as required by regulations or work conditions. Depending on the stage of the project minimum PPE on site will include adequate footwear (CSA approved), hard hat, and high visibility vest or high visibility clothing. This requirement may be modified where the stage of the project no longer includes overhead dangers, exposure to heavy equipment or exposure to rough ground.
3. Hard hats shall be worn as per manufacturers instructions.
4. Employees shall not conduct work they are not qualified to do. Personnel shall only perform tasks they have been trained to perform.
5. No drugs or alcoholic beverages are allowed at work; this may result in disciplinary action or immediate dismissal.
6. No employee shall be under the influence of anything that has an impairing effect while at work.
7. All incidents, hazards, nonconformances or other concerns about work conditions or behaviours shall be reported to a supervisor immediately.
8. All injuries shall be reported to a supervisor and the on-site first aid provider immediately.
9. Employees who smoke shall do so only in designated areas.
10. Employees shall immediately notify their supervisor of any health condition that may reasonably be expected to impact their ability to work.
11. Horseplay, roughhousing, or fighting is strictly prohibited.
12. Vandalism, theft, or misuse of company equipment, tools, or other property is strictly prohibited.
13. Employees must use only designated sanitation facilities (Urinals and Toilets). Failure to do so is grounds for immediate dismissal and removal from the site.
14. Handrails and guardrails provided for the protection of workers must not be removed or rendered ineffective. All guards provided for the protection of workers must be replaced when the nature of the work requires their temporary removal
15. Any act of violence, discrimination, harassment and bullying is prohibited.
16. All Scuka workers, Subtrade workers and visitors must comply with Scuka Safe Work Practices and Procedures, the Scuka Health and Safety Policy, and all WorksafeBC rules and regulations.

## 5.4 Corrective Action

For discipline to effectively correct behaviour, it must be viewed as both fair and reasonable. The key principles that contribute to this are:

- Expectations are communicated
- The level of discipline is appropriate to the offence and the individual
- Disciplinary action is timely
- Discipline becomes progressively more severe (where appropriate)
- Consistency in application and approach
- Confidentiality is respected

Corrective Action Steps for violations or non-compliance of company policies, safety rules or applicable regulations may include:

- Discussion/Meeting (notes taken and information added to personnel file)
- Verbal Warning (letter on file)
- Written Warning indicating next action and the method to prevent it.
- Suspension with or without pay—pending an investigation, if warranted by the circumstances of the incident
- Termination of Employment

## 5.5 Discussion/Meeting/Evaluation

In most situations the problem will first be addressed in a meeting with the employee. The immediate supervisor will inform the employee before the meeting takes place that the meeting is to be a supervisory review and that the results will be recorded. This initial meeting is **NOT** considered part of the formal supervisory review. During the meeting, the supervisor will make sure the employee is aware of the concern and impress upon him/her the importance and necessity of correcting the problem. The supervisor and the employee will together identify the steps necessary to resolve the issue, and what specific improvements are required. Together they will determine time frames and establish a review date along with the employee's commitment to improve work performance. If the problem continues, remedial action may be initiated.

A written record will be kept of the discussion and any goals and/or steps identified as a remedy.

### 5.5.1 Verbal Warning

A verbal review will be conducted to inform the employee of unacceptable behaviour or unsatisfactory job performance and will include actions necessary to improve performance. The review will be documented in his/her personnel file. If the problem continues, the supervisor may implement the next step and issue a written reprimand that outlines expectations and further remedial actions to be taken.

### 5.5.2 Written Warning

An employee warning letter is a notice issued to an employee by Scuka Enterprises Ltd. To address their misbehaviour or poor performance in the workplace and set out consequences or areas for improvement.

### 5.5.3 Suspension

Situations may arise where the employee must be removed from the workplace immediately before an investigation can be conducted. Examples may include a criminal investigation, disorderly conduct or when the employee presents a threat to others in the workplace. In these instances, the employee may be suspended with or without pay, depending on the circumstances

of the investigation. In all cases, management must be informed immediately, and the employee must remain under supervision until removal from the workplace. This should be done before any action is taken, unless there is a need to act because the employee presents a clear and imminent danger if he/she remains in the workplace. The suspension, pending investigation, is imposed with the understanding that a final decision, relative to the appropriate supervisory review, will be made when the investigation is completed.

Investigations may include site management, corporate management, security or outside sources such as the RCMP. Suspension may be with or without pay.

#### **5.5.4 Termination**

When immediate dismissal is required, the employee may be terminated. In addition to any other cause for immediate dismissal referred to in this or any other Scuka policy, where any employee's conduct causes a significant hazard to themselves or any other employee or worker, or constitutes a wilful and deliberate violation of any Scuka safety policy, this shall constitute just cause for immediate dismissal. Where the employee is to be terminated, the employee will receive, in person, a letter of termination. All terminations will be reviewed by management.

### **5.6 Questions**

Direct all questions regarding the application or subject of this Policy to Scuka Enterprises Ltd.

### **5.7 Document Review and Communication**

Following the review and approval of new rules, or changes to the rules, the administrative assistant, and safety representative will ensure all updates are sent to the Supervisor of each operational worksite.

The Supervisor receiving the program update will:

- Ensure all workers are notified of the updated rules at the next toolbox talk.

### **5.8 Documents Posting and Distribution**

A copy of Scuka Enterprises Ltd. Health and Safety Rules must be posted in a high traffic area where it is easily accessible and visible.

### **5.9 Reference Information**

#### **Workers Compensation Act**

Part 2, Division 4, Sections 21 through 30 – General Duties of Employers, Workers and Others;  
Part 2, Division 6, Sections 47 through 5 – Worker Protection in Relation to Prohibited Actions

#### **WorkSafeBC Regulations**

Part 3, Sections 3.1 to 3.3 – Occupational Health and Safety Programs

## 6.0 Personal Protective Equipment

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### 6.1 Policy

Personal Protective Equipment (PPE) is used to reduce exposure to specific hazards and lower the risk of injuries. Scuka Enterprises Ltd. (Scuka) recognizes that PPE is the last line of protection between a hazard and the worker. The hierarchy of controls is used in all Scuka SWP and SJP to decrease the severity of hazards and reduce risk.

Workers are expected to supply and maintain their basic PPE, including hard hats, CSA-approved footwear and protective clothing. PPE must meet WorkSafeBC OHSR and CSA standards to ensure the type and quality. Scuka Enterprises Ltd will supply specialized PPE such a hearing, eye and face protection as well as respiratory protection and fall protection. Scuka will also provide a High Vis vest where employees do not have their own.

### 6.2 Definitions

**"Personal Protective Equipment"** (PPE) is designed to minimize exposure to specific hazards and reduce the risk of potential injuries.

**"Hierarchy of Controls"** is a five-step process to controlling hazards.

**"Field Level Hazard Assessment"** (FLHA) is an evaluation completed before work commencing at a Jobsite. A daily assessment of job tasks, hazards, and control measures.

**"Job Safety Analysis"** (JSA) is a safety tool used to define and control hazards associated with a specific process, job, or procedure.

**"Safe Job Procedures"** is a written, specific step-by-step description of completing a job safely and efficiently from start to finish. Safe Job Procedures must identify the hazards the worker could be exposed to, the steps required to complete the task and the control measures.

**"Safe Work Practices"** can be defined as a set of methods or "Dos and Don'ts" regarding using equipment or carrying out a specific job.

### 6.3 Responsibilities

#### Manager

- Provides a system to select appropriate PPE based on the Jobsite hazards.
- Provides all specialized PPE for Supervisors and Workers.
- Trains Supervisors in PPE selection, fit, care and inspections.
- Reviews the PPE program with JHSC annually.

#### Supervisor

- Ensures PPE is available for workers.
- Trains Workers in the use, fitting, care and inspection of all PPE.
- Maintains training documents and records and fit testing for Scuka employees.

- Ensures that specialized PPE that is inadequate or in disrepair is tagged out and replaced.
- Enforces company rules to ensure basic and specialized PPE is being worn.

### Worker

- Provides their basic PPE and replaces or repairs it as needed.
- Receives training in the selection, fit, care and inspection of PPE.
- Participates in morning toolbox meetings to discuss tasks, hazards and controls.
- Requests specialized PPE that is required for job tasks.

## 6.4 Distribution of PPE

Types of PPE	Basic/ Specialized	Provided By	
		Worker	Employer
Protective Clothing- Protection against the natural elements.	Basic	<input checked="" type="checkbox"/>	
Safety Headgear	Basic	<input checked="" type="checkbox"/>	
Safety Footwear	Basic	<input checked="" type="checkbox"/>	
General Purpose Work Gloves	Basic	<input checked="" type="checkbox"/>	
Specialized Hand Protection	Specialized		<input checked="" type="checkbox"/>
Eye and Face Protection	Specialized		<input checked="" type="checkbox"/>
Hearing Protection	Specialized		<input checked="" type="checkbox"/>
High-Visibility Safety Apparel	Specialized		<input checked="" type="checkbox"/>
Respiratory Protection	Specialized		<input checked="" type="checkbox"/>
Fall Protection Equipment	Specialized		<input checked="" type="checkbox"/>

## 6.5 Fitting, Care and Use of PPE

Types of PPE	Fit, care, and use of PPE
<b>Protective Clothing</b>	<p>Fit: Clothing must fit close to the body and protect against environmental conditions.            Care: Clothing must be cleaned regularly and be free of holes.            Use: Clothing must protect from contact with an abrasive surface, object or contact with a surface at a temperature that could cause a burn injury. Clothing must protect from extreme weather such as high temperatures and sunlight.</p>
<b>Safety Headgear</b>	<p>Fit: Adjust headband size so that headwear will stay on when the wearer is bending over but not so tight that it leaves a mark on the forehead. Ensure that the suspension is in good condition. The main purpose of the suspension is to absorb energy.            Care: A hard hat shell must be inspected before each use. Immediately replace the hard hat if any sign of wear appears or if there is any evidence of damage, abuse or plastic degradation, as this may be a sign that protection is reduced. Any hard hat that shows signs of worn or damaged parts should be removed from service immediately and replaced.            Use: Hardhats are to be worn at any time during construction where overhead hazards can reasonably be expected to occur. Choose the correct headwear for the job. Refer to CSA Standard Z94.1-15 "Industrial protective headwear - Performance, selection, care, and use."            Classes of headwear can include:</p> <ul style="list-style-type: none"> <li>• Type 1 - protection from impact and penetration at the crown (top) only</li> <li>• Type 2 - protection from impact, penetration at the crown (top) and laterally (sides and back).</li> </ul> <p>Each type is also available in the following classes:</p>

	<ul style="list-style-type: none"> <li>• Class E (20 000 V electrical rating) - provides head protection against high voltage conductors</li> <li>• Class G (2200 V electrical rating) - provides head protection against low voltage conductors (general trades)</li> <li>• Class C (no electrical rating)</li> </ul>
<p><b>Safety Footwear</b></p>	<p>Fit:</p> <ul style="list-style-type: none"> <li>• All workers on Scuka Enterprises operated sites must wear CSA approved work footwear. Where designed for laces, laces must be used and intact.</li> <li>• Footwear must be in good condition, with the sole intact to the upper, and the outer material of the boot in a condition in which protection is maintained.</li> <li>• Footwear must reasonably accord with the shoesize of the worker.</li> <li>• The heel should not be more than 60 mm (about 2.5 inches), and the heel should not be lower than the ball of the foot. (from CSA Z195:14 (R2019) Protective footwear).</li> </ul> <p>Care: Rinse or wash with soap and water to clean. Dry and store in a warm area. Use: CSA Standard CAN/CSA-Z195-14 (R2019) footwear must have:</p> <ul style="list-style-type: none"> <li>• A steel toe cap should cover the length of the toes.</li> <li>• Soles come in a variety of thicknesses and materials. They need to be chosen according to the hazards and type(s) of flooring in the workplace.</li> <li>• Uppers of protective footwear come in a variety of materials. Selection should take into account the hazards and individual characteristics of the worker's foot.</li> <li>• A steel midsole that protects the foot against penetration by sharp objects should be flexible enough to allow the foot to bend.</li> <li>• No one type of non-slip footwear can prevent the wearer from slipping on every surface type.</li> <li>• Appropriate footwear for the jobsite must be worn. During forming stages or rough groundwork this will generally be 8 inch high CSA approved boots. During finishing stages this may be relaxed to include CSA approved shoes. The presiding superintendent of each site shall have the final determination if the choice becomes an issue.</li> </ul>
<p><b>General Purpose Work Gloves</b></p>	<p>Fit: Snug to the skin. No dangly bits to get caught in tools. Care: Rinse or wash with soap and water to clean. Dry and store in a warm area. Use: Use for general material handling, handling small parts, electrical component assembly, carpentry, plumbing, and roofing.</p>
<p><b>Specialized Hand Protection</b></p>	<p>Fit: Nitrile and other protective gloves come in all sizes. Ensure that the gloves fit close to the hand and do not present a hazard of getting caught in equipment. Ensure that the gloves fit closely enough that chemicals are not getting inside. Check the SDS of chemicals to make sure the gloves are the correct type for handling those chemicals. Care: Throw out after use. Use: Wear while handling chemicals, products, substances of biohazards requiring specialized hand protection. At the the end of the day ensure that they are thrown out. Wash hands following use.</p>
<p><b>Eye and Face Protection</b></p>	<p>Fit: Elements of Protective Eyewear Fit</p> <ul style="list-style-type: none"> <li>• Temple tips should not pinch in the area around the wearer's ear.</li> <li>• Pressure on the head from the temples or side arms should be acceptable (not too loose or too tight).</li> <li>• Nosepiece shouldn't pinch or slide.</li> <li>• If the nose pads are adjustable, check fit and adjust as needed; the full surface of the nosepiece or nose pads should touch the wearer's nose.</li> <li>• The weight of the eyewear should be comfortable on the face.</li> <li>• The eyewear or face protection should be selected based on acceptable coverage of the face. Where you are running a chain saw, gas axe or grinder,</li> </ul>

	<p>particularly for an extended period, a full face shield will be the best choice. When using chemicals likely to cause eye damage, goggles will be a good choice. When conducting regular day to day work that presents a hazard to the eyes choose safety glasses having as close a fit to the face as can be reasonably accomplished.</p> <p>Care:</p> <ol style="list-style-type: none"> <li>1. Clean your devices daily.</li> <li>2. Avoid rough handling that can scratch lenses.</li> <li>3. Store your devices in a clean, dry place where they cannot fall or be stepped on.</li> <li>4. Replace scratched, pitted, broken, bent or ill-fitting devices immediately.</li> </ol> <p>Use: Choose the appropriate style of eye and face protection for the task. Where large volumes of material are being cut or removed, or a significant amount of sparks are being created, a face shield provides much more protection than safety glasses and should be used.</p>
<p><b>Hearing Protection</b></p>	<p>Fit: Foam plug firmly inserted into the ear canal. Earmuffs – fitted firmly over the ears.</p> <ol style="list-style-type: none"> <li>1. Wash and clean hands before opening foam ear plugs and ensure the packages are clean.</li> <li>2. Roll plug slowly between thumb and finger.</li> <li>3. Compress the plug until it's a cylinder.</li> <li>4. Insert the compressed foam plug into the ear canal</li> </ol> <p>Check fit after plug expands.</p> <p>Care: Throw out foam plugs after use. Place earmuffs where they will not be broken. Wipe with a cloth where necessary. Use: Choose the appropriate hearing protection for the task and noise level. Where exposure to a loud environment is expected to be ongoing earmuffs are preferred over foam plugs. Where the sound level is above 105 decibels (comparable to shouting in the ear) and continuous workers are expected to wear both foam plugs as well as earmuffs.</p>
<p><b>High-Visibility Safety Apparel</b></p>	<p>Fit: Fit adjustable straps to individual.</p> <p>Care: Rinse or wash with soap and water to clean. Dry and store in a warm area.</p> <p>Use: Workers exposed to vehicles or mobile equipment travelling at speeds equal to or less than 30 km/h must wear high visibility apparel that meets the requirements for Class 1, Class 2 or Class 3 apparel as described in CSA Standard Z96-1 5, High-Visibility Safety Apparel. Workers exposed to vehicles or mobile equipment travelling in excess of 30 km/h must wear high visibility apparel meeting at least Class 2 or Class 3 of the same standard.</p>
<p><b>Respiratory Protection (Disposable and Reusable)</b></p>	<p>Fit: Workers wearing respirators must be clean shaven.</p> <ul style="list-style-type: none"> <li>• Disposable: Apply both upper and lower straps so as to secure the mask to the face. Pinch the metal nasal strip to better fit the mask to the face.</li> <li>• Reusable ½ mask: Fit testing required annually and must be documented. A user seal check should be performed at each use.</li> </ul> <p>Positive Pressure User Seal Check:</p> <ul style="list-style-type: none"> <li>• Exhale gently while blocking the paths for air to exit the respirator. A successful check is when slight pressure builds up in the respirator without any leakage.</li> </ul> <p>Negative Pressure User Seal Check:</p> <ul style="list-style-type: none"> <li>• Inhale while blocking the paths for air to enter the facepiece. A successful check is when the facepiece collapses slightly under the negative pressure.</li> </ul> <p>Care: Disposable: Dispose of respirator when function seems impaired (breathing becomes restricted) or device becomes dirty. Reusable: Wipe respirator down with alcohol wipe. Store respirator separately from cartridges in a plastic storage bag.</p> <p>Use: Use the appropriate respirator for the task. Do not wear your respirator into</p>

	atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke. If you do not know what respirator to wear you should speak with your supervisor. Replace cartridges regularly.
<b>Fall Protection Equipment</b>	<p><b>Fit:</b> A Fall Protection Harness must fit snug on the body. The back strap is below the buttocks. Leg straps are tightened to only let 2 or 3 fingers through. The D ring is placed between the shoulder blades. The chest strap is snug across the middle of the chest. Lifelines, self retractors, harnesses and lanyards shall be informally inspected prior to each use, and formally inspected annually.</p> <p><b>Care:</b> Wipe down if soiled during use. Hang in a tool crib or stored in tote. Do not leave exposed to direct sunlight for extended periods. Do not allow to become contaminated with chemical substances.</p> <p><b>Use:</b> Fall protection equipment is to be used when working at heights above 3m (10ft) or in circumstances when a fall from less than 10 feet can be expected to lead to significant injury. Scuka workers, and subtrades, are expected to be familiar and comply with the Scuka Working at Heights SWP/SJP. Lifelines and self-retractors must be affixed to objects that meet the requirements of the Worksafe Regulations including a load capacity of 800 lbs where a fall restraint system is being used, and a 5000 lbs load capacity where a fall arrest system is being used.</p>

## 6.6 PPE Selection

Personal Protective Equipment is selected based on the following information:

- PPE meets required Occupational Health Safety Regulations and Hazardous Products Regulations.
- PPE is chosen to meet safety requirements described in Field Level Hazard Assessments, Safe Work Practices, Safe Job Procedures, Manufacturer Manuals and Job Safety Analysis.
- An inventory of chemicals, products and substances are collected on each Jobsite. Safety Data Sheet (SDS) and product labels are reviewed to determine PPE requirements.

## 6.7 Training

Scuka employees are trained to use all basic and specialized PPE during New Worker Orientations, Site Specific Orientations, weekly safety meetings and job-specific training. PPE training includes:

- What is basic and specialized PPE? Who supplies it?
- How to find the PPE requirements for chemicals, equipment, power tools and equipment.
- The proper fitting, care and use of PPE.
- The lifespan and disposal of required PPE.
- The limitations of specific PPE.

## 6.8 Inspection and Maintenance of Basic and Specialized PPE

In addition to the guidance with respect to care of PPE referred to in section 6.5, the following procedures shall apply with respect to Inspection and Maintenance of Basic and Specialized PPE.

1. Basic PPE including boots, hardhat and clothing shall be subject to informal inspection by each worker on a daily basis. This inspection does not require documentation.

Where the hardhat and clothing no longer meets appropriate standards for the work environment, including overall condition, that hardhat or clothing shall be replaced.

2. Specialized PPE – ½ face respirator – Scuka provides workers with a ½ face respirator where their work is such that they will be exposed to dusty or gaseous environments. ½ face respirators shall be subject to an informal and undocumented inspection by the worker prior to each use. Workers are fit tested annually as a WorkSafeBC requirement and at that time the workers ½ face respirator shall also be subject to testing. Where the ½ face respirator fails to protect the worker during the fit testing it shall be removed from service and another ½ face respirator shall be provided and tested. The documentation of this testing shall consist of the certificate of fit testing provided by the fit tester.
3. Specialized PPE – Fall Protection Equipment. Fall protection equipment shall be informally inspected by the worker prior to each use. Where that equipment is believed to be defective the equipment shall be removed from service and go back to head office for inspection and review. Fall protection equipment shall be formally inspected annually by Scuka staff who have fall protection training. This formal inspection shall be documented using the template “Annual Fall Protection Inspection” and shall be retained. This inspection shall include examination of each piece of equipment to confirm that the equipment is in the condition as issued at the time of manufacture and has not been compromised. Any fall protection equipment that does not pass this examination shall be immediately removed from service.
4. Specialized PPE – Gloves & Coveralls. Where PPE is intended to insulate the wearer from contact with materials that PPE shall be inspected by the worker prior to each use. This is an informal inspection and does not need to be documented.

## 6.9 Reference Information

### Workers Compensation Act

Part 2, Division 4, sections 21 through 30 – General Duties of Employers, Workers and Others

### WorkSafeBC Regulations

Part 8, Section 8.1 to 8.45 – Personal Protective Clothing and Equipment

## 7.0 Preventative Maintenance

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### 7.1 Policy

The purpose of Preventative Maintenance is to ensure that all tools, equipment and vehicles are properly maintained to extend their service life and will not damage the environment or compromise the health and safety of workers, visitors or subcontractors.

Regulatory bodies and equipment manufacturers have specifications for maintenance, and this information is incorporated into the maintenance of equipment. Supervision shall ensure that qualified personnel, according to manufacturer's warranty, carry out all preventative maintenance frequently or by the established schedules.

Each vehicle, tool or piece of equipment will be inspected daily prior to use. Vehicles and equipment will be fitted with a trip logbook as necessary. Any defective tools, vehicles or equipment that pose a hazard shall be removed from service until repaired by a qualified person or replaced. Through regular inspections, all workers and supervisors are responsible for identifying and removing defective equipment from service.

### 7.2 Responsibilities

#### Manager

- Ensures all company tools, equipment and vehicles are appropriately cared for and maintained.

#### Supervisor

- Ensures all preventative maintenance is carried out by qualified personnel,
- Ensures maintenance is carried out according to established schedules that meet regulatory and/or manufacturers' standards,
- Ensures all equipment that requires ongoing maintenance is identified, logged or documented,
- Ensures that workers are trained in how to remove defective equipment or tools from service, and
- Ensures all preventative maintenance records are maintained.

#### Worker

- Regularly checks and/or inspects all tools, vehicles and equipment prior to use,
- Ensures any tools, vehicles or equipment that pose a hazard are tagged as "out of service",
- Uses "out of service" tags; notifies supervisor and provides a complete description of the problem, and
- Exercises the right to refuse to work with unsafe equipment, when necessary.

### 7.3 Maintenance

#### 7.3.1 Inventory of Items

Scuka Enterprises Ltd. has documented a list of items in their Equipment Inventory. This list includes all Company tools, equipment and vehicles to be maintained. Scuka Enterprises Ltd. will manage Maintenance Schedules for each item in the Equipment section.

### **7.3.2 Servicing Equipment and Company Vehicles**

Scuka Enterprises Ltd. uses Maintenance Schedules that meet regulatory and manufacturers' standards for all items that need to be maintained. When equipment and vehicles have reached hours of service or set points for maintenance, the Office Admin will notify the appropriate personnel. Maintenance personnel will then be contacted, and a service date will be agreed upon. The equipment is made available when the maintenance person arrives, and the equipment is repaired or serviced to the manufacturer's specifications.

Following repair or service, stickers will be placed in the equipment or vehicle to remind the operator when the next service is due; this is usually the next equipment hour level to be reached. Maintenance sheets and invoices are completed and signed off. This provides a record of equipment and vehicle maintenance service and repair.

### **7.3.3 Daily Informal Tool Inspections**

All employees must inspect their tools prior to use. If any defect is found, follow the "Defective Tool Repair Steps" as stated on page 3.

### **7.3.4 Daily Vehicle and Equipment Inspections**

All vehicle operators will conduct a daily informal inspection of their vehicles before use. Any defects shall be reported to the office so that arrangements can be made for repair or shall be corrected forthwith by the operator.

All equipment operators are required to fill out a daily inspection sheet before use and before the shift begins. All equipment shall be inspected utilizing the inspection checklist which can be found on Procore.

If any defects are found during the inspection, workers will follow the correct tag out/lock out procedures and then record the deficiency. This individual will take corrective actions to fix the deficiency. The corrective action taken will be described in the Inspection document under maintenance with the complete date. Note: Any defects should be dealt with immediately or as soon as reasonably achievable.

### **7.3.5 Defective Tool Repair Steps:**

1. Bring defective tool(s) to your supervisor.
2. Tag tool with a company tag explaining what's wrong with it. Note: If any tool is not tagged, it will not be sent out.
3. Tool is returned to Head Office for repair or removal from service.

### **7.3.6 Defective Equipment Repair Steps:**

1. If a piece of equipment is defective, notify your supervisor immediately.
2. Shut down the equipment and isolate the energy source using the manufacturer's instructions.
3. Remove all stored potential energy and confirm zero energy flow state.
4. Tag equipment to explain what's wrong and ensure that the equipment is locked out.

## 7.4 Qualifications

All individuals who perform maintenance, inspections or operate tools, equipment and vehicles should have the appropriate skills, accreditation and certification. This certification applies to both company workers and contracted maintenance services.

- Qualifications should include:
- Vehicle operators must possess a valid driver's license.
- Personnel are trained and experienced in the following areas:
  - The use, inspection, and repair of the items to be maintained.
  - Familiarity and comprehension of the safety requirements for the equipment that they intend to repair or operate,
  - Familiarity and use of manufacturers' operating and maintenance manuals,
  - Ability to communicate to maintenance personnel when there is a problem with a specific piece of equipment.

## 7.5 Training

Prior to starting work, supervisors, workers and maintenance personnel will be trained in the following:

- The policy and how it is applicable to the maintenance of the equipment,
- Defective tool management,
- Repair and maintenance schedules of equipment, and
- Daily inspection of tools, equipment and vehicles.

## 7.6 Reference Information

### Workers Compensation Act

Part 2, Division 4, Sections 21 through 30 – General Duties of Employers, Workers and Others

### WorkSafeBC Regulations

Part 4, Section 4.1 to 4.12 – Buildings, Structures, Equipment and Site Conditions; Part 13, Division 5, Section 13.20 through 13.33 – Moveable Work Platforms; Part 14 Sections 14.2 through 14.33 Cranes and Hoists; Part 16, Division 1, Section 16.3 through 16.18 Mobile Equipment, General Requirements

## 8.0 Training and Communication

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### 8.1 Policy

This element provides positive guidelines to effectively communicate and train the workforce in Scuka Enterprises, Ltd. health and safety policies, practices and procedures.

As required by legislation, Management shall provide appropriate health and safety training that will give workers the skills and tools to identify and manage the risks associated with their environment. This will ensure workers perform their work safely and enable individuals to communicate any health and safety concerns to Management.

Training activities required within the industry are established through regulatory requirements, industry best practices and safety literature. Scuka Enterprises, Ltd. must be involved in developing and delivering training at all levels of the organization. Training may be delegated to third parties, but the organization's supervisory level will lead and monitor the training effort to ensure it is effective.

Through daily, weekly and monthly Safety Meetings, Scuka Enterprises, Ltd. will ensure that all Health and Safety issues are communicated to all employees and contractors. Utilizing PROCORE as well as paper files. Training and safety meetings will be documented and maintained.

### 8.2 Responsibilities

#### Management

- Takes a positive, proactive approach to education and communication,
- Takes corrective steps, including ensuring resources are in place in an appropriate and consistent manner to address all training and educational issues,
- Ensures supervisors are adequately trained to prepare workers to perform their duties, and
- Ensure employees' training records are documented and filed.

#### Supervisor

- Trains and educates the workforce in a positive and constructive manner,
- Ensures all workers receive a New Hire Orientation prior to starting work,
- Trains workers in their specific tasks,
- Provides instructions to workers in practices and procedures,
- Takes action to ensure workers understand and comprehend the training,
- Measures workers' knowledge and competency of training to ensure completion,
- Ensures only authorized, adequately trained workers operate tools and equipment,
- Ensures that equipment and materials are properly handled, stored and maintained,
- Evaluates and monitors all training activities daily,
- Holds toolbox talks and safety meetings as required by policy,
- Participates in and solicits participation from others in these meetings, and
- Records and documents all meetings, education and training activities in the Supervisor's Safety Log.

## Worker

- Participates positively in training and educational activities,
- Actively participates in required safety meetings and training classes, and
- Contacts supervisor for the appropriate training when unsure of the task/job required to be performed.

## 8.3 Training

For training to be effective, Scuka Enterprises, Ltd. must conduct a Training Needs Analysis prior to implementation. This Analysis will determine employees' training needs by comparing their current competency to the competency level required for their position. This will be conducted before an employee starts work. Competency checks will be completed on all employees.

Scuka Enterprises, Ltd. conducts the following training activities:

### 8.3.1 New Hire Orientation

Scuka conducts a two stage orientation process for Scuka employees. New Scuka Employees are provided with a company orientation which includes providing written confirmation of receipt of the Employee manual. The company orientation covers off company based policies including the right to be free of discrimination or harassment, prohibitions with regard to violence in the workplace, drug and alcohol policies, disciplinary procedures and general company rules. In addition to the Company Orientation Scuka also conducts an additional site specific orientation. It is mandatory that all employees or contractors employed by Scuka Enterprises, Ltd attend the Site Specific Safety Orientation prior to commencing work. This applies to a new, transferred or returning employee.

The Site Specific Safety Orientation covers the requirements of WorksafeBC Regulation 3.23. Please note that the site specific orientation is not a project specific orientation. It includes the following information:

- Supervisor Contact Information
- Employer's and Workers' Rights and Responsibilities
- Health and Safety Policy
- Health and Safety Rules
- Possible workplace hazards new workers may be exposed to
- Working alone or in isolation
- Bullying and Harassment
- Violence in the Workplace
- Personal Protective Equipment
- Location of first aid facilities and how to summon first aid
- Reporting Incident/Injury/Illness/Near Miss
- Emergency Procedures
- Instruction and demonstration of the new worker's tasks
- WHMIS 2015 and Safety Data Sheets (SDS)
- Joint Health and Safety Committee (JHSC) contact information
- Locations of the Health and Safety Program, Practices and Procedures

Each company employee will be checked for competency at the completion of the orientation to ensure they have a good understanding of the materials presented. This is not the final step of

the process; the supervisor will be required to monitor the employee to ensure they put what they have learned into practice.

### **8.3.2 Supervisor Orientation and Training**

Supervisors are required to go through both the New Hire Orientation as well as any site orientation. Supervisors will also receive ongoing formal and informal training on topics pertinent to their role including workplace inspections, health and safety responsibilities and investigation and reporting procedures.

### **8.3.3 Job/Task Specific Training**

Scuka Enterprises Ltd. will assess qualifications, including certificates and years of experience, to ensure that Job Specific Training is conducted by a competent person.

Job Specific Training teaches the skills, knowledge and competencies that are needed to perform a specific job. Job Specific Training may be formal or informal and may take anywhere from a few minutes to several months. Formal training involves the use of written reference material that is delivered in a controlled environment. Informal training involves the teaching of hands-on skills. In either case, Scuka Enterprises, Ltd. must determine what the employee has retained before he/she can pass to the next level or execute the task.

Job Specific Training/instruction of workers is conducted when:

- A new employee is hired,
- An employee is assigned to new or different work, and
- An employee is moved to a new location.
  
- The immediate supervisor will determine and arrange Job Specific Training based on a task's complexity and the employee's current task knowledge and experience. The employee will be provided with all the necessary information to perform the task safely and correctly. This training could involve work procedures, practices, task specific hazards, etc.

## **8.4 Site Safety Records**

- Records of safety presentations, toolbox talks, inspections, daily Field Level Hazard Assessments (FLHA's) are to be retained and may be recorded on Procore or on the office server.

## **8.5 Training Records**

Scuka Enterprises Ltd. will document and maintain up-to-date New Hire Orientation records, formal training records and competency records for all employees. These records will be kept at the head office.

### **8.5.1 Retention Time**

Safety Meeting Minutes, New Hire Orientations, Job Specific Training records, attendance records and competency verification must be kept for the duration of workers' employment plus three years.

## 8.6 Communication - Safety Meetings

Safety Meetings are the primary vehicle for maintaining ongoing safety awareness and facilitating the exchange of safety information. Therefore, all employees, including senior management, will attend and participate in health and safety meetings.

The following five basic types of safety meetings will be conducted, documented and digitally filed in PROCORE:

### 8.6.1 Morning Toolbox Meeting

The morning toolbox meeting, as part of the completion of the Field Level Hazard Assessment (FLHA) provides timely information on health and safety items that relate to project activities. Prior to starting work each day this meeting will be conducted by supervisors and/or the Site Safety Coordinator.

It is mandatory for all crew members to attend these meetings. A record of attendees and the hazards discussed must be recorded on the Field Level Hazard Assessment (FLHA) form. The minutes must be made available to the workers. Anyone who is unable to attend this meeting must be informed about meeting topics and discussion items.

### 8.6.2 Weekly Crew Safety or Toolbox Talk

This weekly meeting involves the Site Safety Coordinator and the entire crew. The minutes of these meetings are kept on the site location. These meeting will involve a review of significant inspection or incident investigation results on the worksite, review of relevant safe work practises/procedures, include a current topic for discussion, and allow for worker input or questions of a safety related basis.

### 8.6.3 Monthly Management Safety Meeting (PM/SS Meeting)

The monthly PM/SS (Project Manager/Site Superintendent) meeting involves the President of Scuka Enterprises, Project Management Staff, and Site Superintendents as well as the Health and Safety Manager. The minutes of these meetings are also recorded and stored in the Head Office/Meetings section of PROCORE. These meetings will include a review of events on Scuka worksites that resulted in significant injury to workers, or the potential for significant injury to workers, as well as events determined by the JOHS Committee to require company wide attention.

### 8.6.4 Round Table Meeting

The Round Table Meeting is conducted at least six times per year and more frequently where there are particular issues to be addressed. The Round Table meeting involves the President of Scuka Enterprises and the project administration and management staff including the Health and Safety Manager. The minutes of these meetings are recorded and stored in the Head Office/Meetings section of PROCORE. These meetings will include a review of events on Scuka worksites that resulted in significant injury to workers or had the potential to result in significant injury to workers, as well as events determined by the JOHS Committee to require company wide attention.

### 8.6.5 Monthly Joint Health and Safety Committee Meeting

Please see description in Section 14 of the Safety Manual

## 8.7 Reference Information

### Workers Compensation Act

Part 2, Division 3, Sections 21 through 30 – General Duties of Employers, Workers and Others

### WorkSafeBC Regulations

Part 3 Section 3.3 Occupational Health and Safety Programs - Contents of Program; Part 3, section 3.23 Young or New Workers; Part 3, section 3.26 and 3.27 Joint Health and Safety Committees

## 9.0 Workplace Inspections

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### 9.1 Policy

The purpose of conducting Workplace Inspections is to identify conditions, behaviours and hazards that could lead to incidents. During an inspection, situations or deficiencies that have the potential to cause harm, such as unsafe acts or unsafe conditions, will be identified, prioritized and corrected in a timely manner.

Scuka Enterprises Ltd. will conduct formal and informal inspections that cover the worksite, equipment, vehicles and personal protective equipment (PPE). Formal inspections are documented inspections that will be conducted at a pre-determined frequency. This frequency is outlined under Types of Inspections (see page 3). Informal inspections are daily inspections that are conducted prior to all work activities.

The employer is responsible for the overall operation of the program. Scuka Enterprises Ltd. will direct formal inspections on their on-job sites and ensure workers are involved in these inspections. Supervisors are responsible for conducting formal and informal inspections, while workers are responsible for participating in these inspections.

Scuka Enterprises Ltd. believes it is important that the Joint Health and Safety Committee (JHSC) participates in inspections. Management personnel will closely monitor and keep a record of all inspection reports.

### 9.2 Definitions

**Inspections** are a comprehensive survey of workplaces, personnel, processes, equipment or tools.

**Unsafe Acts** are defined as the activities in which employees are engaged or involved in an unsafe manner and include unauthorized use or operation of equipment.

**Unsafe Condition** is defined as an unsatisfactory physical condition that exists at the workplace, especially immediately before an accident, which played a crucial role in triggering the accident.

### 9.3 Responsibilities

#### Management

- Ensures the inspection process and appropriate actions are being implemented.
- Ensures resources are available to conduct, record and make changes to any unsafe actions or conditions.
- Maintains an awareness of the importance of conducting Workplace Inspections, assessing the hazards and implementing the controls.

#### Supervisor

- Conducts inspections of their area of responsibility, e.g., where their crews are working.
- If unsafe practices or conditions are identified, ensures prompt corrective action is taken to eliminate the causes.

## Employee

- Conducts regular inspections of their area(s) of responsibility, to ensure safe work practices are being followed.
- Reports unsafe conditions to their supervisor if they can't be immediately corrected.

## 9.4 Types of Inspections

### 9.4.1 Informal Inspections

On a daily basis, all employees, supervisors and managers must conduct ongoing informal inspections of their work environment. Any unsafe act and/or unsafe condition must be reported to the supervisor or person responsible for that area or operation.

In many cases, an employee and supervisor can correct a problem by discussing and correcting the act or condition before an incident occurs. There may be situations that require additional corrective action. These should be recorded in Procore or the FLHA for follow-up.

### 9.4.2 Formal Inspections

Formal or planned inspections are completed on a scheduled basis and documented in PROCORE. The supervisor or designate will set the planned schedule of inspection(s) for his/her respective area depending upon the hazards and possible risks.

### 9.4.3 Site and Permanent Facility Inspections

Scuka Enterprises Ltd will develop Site Inspections, Permanent Facility Inspections and any other type of workplace inspection on PROCORE. These inspection forms are built by selecting the specific site location and then clicking Inspection.

During a planned walk-through of the site or facility, the inspectors will visually inspect all areas and utilize these Inspection forms to document and prioritize the deficiencies identified. Corrective actions will be implemented in a timely manner to correct these deficiencies.

## Site Inspection

A weekly and monthly site inspection is to be conducted by the Health and Safety Manager or a person designated by the Health and Safety Manager. Workers shall also be given opportunity to participate in these inspections through either attendance during the inspection or review of results subsequent to the inspection. Where a site is of sufficient size and hazard rating that a Site Safety Coordinator has been assigned by Scuka to the site, or is of sufficient size and hazard rating that Worksafe Regulations require two basic or higher level first aid attendants be assigned to the site<sup>1</sup> the Site Safety Coordinator or someone designated by the Health and Safety Manager will also complete a daily inspection of the site on which they are based. Where daily inspections are hereby required workers shall be given an opportunity to participate in the inspection through either attendance during the inspection or review of the results subsequent to the inspection.

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<sup>1</sup> Worksafe Regulation Table 3-1

2 – 9 workers - high hazard, one basic first aid attendant with basic first aid kit required.

10 – 19 workers – high hazard, two basic first aid attendants with basic first aid kit required.

Where a job site reaches a stage where its WorksafeBC Hazard Classification is moderate (for example, drywall stage, or finish carpentry stage) the daily or weekly inspection can be satisfied by daily completion of the Field Level Hazard Assessment of the Scuka workers on site.

Site Inspections other than those done through completion of the Field Level Hazard Assessment must be documented on the Inspection form which is located in the Inspection section of PROCORE.

### **Permanent Facility Inspection**

This inspection of the office/garage is to be conducted by a Scuka Enterprises Ltd. employee on a monthly basis.

Permanent Facility Inspections must be documented on the appropriate Inspection form located in the Inspection section of PROCORE. For future reference, all site inspections can be reviewed by selecting Inspections in PROCORE.

## **9.4.4 Equipment and PPE Inspections**

Equipment and PPE inspections occur on each active site.

### **Equipment**

- These are to be conducted by the operator at the start of the work shift or prior to operating a piece of equipment. The Equipment Inspection must be documented on the appropriate form located in the Equipment Inspection section of PROCORE.

### **PPE Inspections**

- For information regarding PPE Inspections, please refer to the specific PPE Chapter of the Occupational Health and Safety Policy.

## **9.5 Inspection Recording Process**

Any unsafe acts and/or conditions observed during an inspection must be recorded on the Inspection form located in PROCORE. The individuals conducting the inspection will record the location of the unsafe acts and/or conditions, a description of the hazard, hazard control actions and description, and a priority rating.

### **9.5.1 Prioritizing the Hazards Identified**

1. Probable – to occur immediately or within a short period of time
2. Reasonably Probable – will occur in time if not corrected
3. Remote – may occur in time if not corrected
4. Very Remote – unlikely to occur

### **9.5.2 Severity Rating is Identified**

1. Critical – may cause death or catastrophic damage to a facility
2. Serious – may cause severe injury, severe occupational illness or major property damage
3. Minor – may cause minor injury or minor occupational illness or minor property damage
4. Insignificant – probably would not affect personnel safety or health but is in violation of specific criteria

Then using these ratings in conjunction with the Risk Assessment Scoring Matrix, the degree of risk can be graded to provide a measure of the project's or job's risk exposure for each.

- A. Critical**
- B. Serious**
- C. Moderate**
- D. Minor**

The table below shows the Risk Assessment Scoring Matrix that provides a standard method to calculate gradings based upon combination of probability and severity ratings.

### Risk Assessment Scoring Matrix

Probability Severity	Probable (1)	Reasonably Probable (2)	Remote (3)	Very Remote (4)
<b>Critical (1)</b>	A	A	B	B
<b>Serious (2)</b>	A	B	C	C
<b>Minor (3)</b>	B	C	C	C
<b>Insignificant (4)</b>	B	C	C	C

#### 9.5.3 Hazard Control Actions

The supervisor will ensure that deficiencies identified during inspections are addressed in a timely manner based on their priority ranking. It is the supervisor's responsibility to assign the hazard control actions to the appropriate personnel. This will be done on the Inspection form by selecting the site and selecting Site Safety Coordinator with a "Target date" as shown in PROCORE.

#### 9.5.4 Monitoring and Follow-Up

The supervisor is accountable to ensure hazard control actions are accomplished by this specific date. Feedback on this action is to be conveyed to the inspection team and the crew.

### 9.6 Inspection Review and Communication

#### 9.6.1 Management Review Process

Scuka Enterprises Ltd. Company Safety Manager must monitor the inspection process to ensure inspections are conducted at predetermined intervals and that deficiencies are corrected in a timely manner. All Inspections will be reviewed and evaluated by Senior Management.

### **9.6.2 Communication**

Scuka Enterprises Ltd. will ensure that Inspection Reports are communicated to the appropriate employees. Following the inspection, all affected workers will be informed of the inspection results at the next toolbox talk.

## **9.7 Reference Information**

### **Workers Compensation Act**

Part 2, Division 4, Sections 21 through 30 – General Duties of Employers, Workers and Others

### **WorkSafeBC Regulations**

Part 3, Sections 3.1 to 3.3 – Occupational Health and Safety Programs; Part 3, Sections 3.5 to 3.8 Workplace Inspections

# 10.0 Investigations and Reporting

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## 10.1 Policy

Incident investigation and reporting is a good safety management practice and Scuka Enterprises Ltd. obligation and regulatory requirement. The purpose of the incident investigation is to determine the cause of the incident and implement suitable corrective measures so further incidents can be prevented.

Using a team-based approach Scuka Enterprises Ltd. will investigate incidents, accidents and near miss occurrences. The immediate supervisor or Health and Safety Manager will lead the Incident Investigation with the assistance of a worker representative and/or Joint Health and Safety Committee (JHSC) member.

## 10.2 Definitions

**Incident** is an accident or other occurrence that resulted in, or had the potential to cause, an injury or occupational disease.

**Near Miss** is an event or sequence of events that had the potential to cause serious injury, or significant property damage.

**Accident** is an event or sequence of events that resulted in any injury, illness or property damage

## 10.3 Responsibilities

### Management

- Provides the necessary resources to implement approved corrective and preventative actions,
- Ensures all workers receive training and education in the reporting of incidents, and
- Ensure regulatory reporting requirements are followed for the incident types stated in Section 172 of the *Workers Compensation Act* (Note: Types are stated under “Immediate Notice of Certain Accidents” on the following page).

### Supervisor

- Investigates all incidents or near misses to determine the underlying causes,
- Ensures that incident investigations are carried out with the participation of employer and work representatives,
- Ensures investigations are reported in detail to the manager, and the required report forms are completed within an acceptable time frame,
- Ensures preliminary, interim and full investigation reports and full corrective action reports are provided to health and safety committee(s) or worker safety representative(s), and
- Reviews accident or incident statistics and reports, in order to identify and implement corrective action(s).

### Employee

- Reports all incidents to the immediate supervisor,
- Takes steps to prevent further loss, injury or damage resulting from an incident,

- Participates in the investigations of incidents, and
- Is a part of the solution.

## 10.4 Reporting of Incidents, Accidents or Near Misses

All workers employed on site will immediately report any incident, accident or near miss to:

- The site supervisor or designate,
- The acting first aid attendant or the nearest first aid facility any time an injury occurs.

The site supervisor or designate will:

- Immediately investigate “Incidents that must be Investigated” as stated below,
- Document a minor near miss in the Procore Incidents section, and
- Complete a Near Miss Investigation form and document in PROCORE for all serious near misses.

An employee who leaves the worksite without reporting and completing the required documentation will be considered absent from work and:

- Will not receive pay for any missed time,
- May be subject to disciplinary action (Rule Encouragement and Enforcement Procedures), and
- May have a formal objection filed against any claims for compensation benefits.

### 10.4.1 Immediate Notice of Certain Accidents

Scuka Enterprises Ltd. management must immediately notify the authority having jurisdiction of the occurrence of any accident that:

- Resulted in serious injury to, or the death of, a worker,
- Involved a major structural failure or collapse of a building, bridge, tower, crane, hoist, temporary construction support system or excavation,
- Involved the major release of a hazardous substance, and
- Is an incident required by regulation to be reported, or
- Is an incident defined as a dangerous occurrence

Scuka Enterprises Ltd. management must inform WorkSafeBC and the Occupational Health and Safety Committee as soon as practicable.

Unless directed by an officer of the Board or a peace officer in the case of a fatal accident a person must not disturb the scene of an accident that is reportable, except so far as necessary to:

- Attend to persons injured or killed,
- Prevent further injuries or death, or
- Protect property that is endangered as a result of the accident.

### 10.4.2 Incidents that Must Be Investigated

Scuka Enterprises Ltd. must immediately investigate the cause(s) of any accident or other incident that:

- Resulted in injury to a worker requiring medical treatment, or
- Did not involve injury to a worker, or involved only minor injury not requiring medical treatment, but had the potential for causing serious injury to a worker, or
- Was an incident required by regulation to be investigated, however

- No such investigation is required to occur where the incident pertains to a vehicle accident that occurs on a public highway or street.

### 10.4.3 Submitting Investigation Reports to WorkSafeBC

For any incident that must be investigated, the following reports must also be made:

- A preliminary investigation report is to be prepared within 48 hours of the occurrence of the incident. This does not have to be submitted to the board unless the board requests it or a Worksafe officer directs that it be submitted.
- Determine interim corrective actions as appropriate and prepare a corrective action report,
- Complete a full investigation and submit a report to WorkSafeBC within 30 days of the incident, and
- Determine final corrective actions as appropriate and prepare a final corrective action report.

## 10.5 Investigation Process

Scuka Enterprises Ltd. will immediately undertake an investigation into an incident. As far as possible, the investigation will identify any unsafe conditions, acts or procedures that significantly contributed to the incident.

These four stages are to be followed when an incident is being investigated:

### 10.5.1 Pre-Investigation Stage

Where there is a requirement to immediately report an incident to WorksafeBC the scene of the incident shall be left undisturbed until permission to clear the scene has been granted by the regulatory officer or a peace officer. Exceptions include activities required to carry out rescue work or to prevent further damage or injury, in which case, photographs and sketches of the incident scene should be undertaken beforehand, if feasible.

### 10.5.2 Pre-Occurrence Stage

The pre-occurrence stage involves review of factors that existed prior to the sequence of events which culminated in the incident. These may include Scuka Enterprises Ltd. characteristics, such as a safety program, supervision, safe work procedures, equipment maintenance, meeting minutes; and/or worker characteristics, such as occupation, health, experience, training, disciplinary records, etc.

### 10.5.3 Occurrence Stage

The occurrence stage involves review of the immediate factors that occurred during the incident. These may include what the person(s) involved was/were doing (task, specific activity, posture, etc.), materials and equipment directly involved (type, brand, size, etc.), actions and movements that led to the accident or incident (fall, trip, slip, etc.), and environmental characteristics (weather, lighting, noise, temperature, vapours, ventilation, etc.).

### 10.5.4 Post-Occurrence Stage

The post-occurrence stage includes factors that occurred during the response to the actual incident that minimized or increased the seriousness. These may include the response time of emergency personnel, first aid available on site, location and condition of emergency equipment, emergency plans, as well as personal protective equipment worn or unused.

## 10.6 Investigation Reporting Procedure

WorkSafeBC provides an Employers Incident Investigation Report form that can be used to create the required Preliminary Investigation Report, Interim Corrective Action Report, Full Investigation Report and Full Corrective Action Report. By collecting all necessary information and completing the appropriate sections of the Investigation form, each of the four reports will be completed as required. The following outlines the purpose and timeline for each required investigation report.

### 10.6.1 Preliminary Investigation Report

Scuka Enterprises Ltd. will prepare a report of their preliminary investigation which will identify any unsafe conditions, acts or procedures that must be addressed so work can resume safely until a full investigation has been completed.

This report must be prepared and completed within 48 hours of the occurrence of the incident. Upon request Scuka Enterprises Ltd. will provide a copy of the preliminary report to WorkSafeBC. Scuka Enterprises Ltd. will provide a copy of the preliminary report to the JHSC.

### 10.6.2 Interim Corrective Action Report

Scuka Enterprises Ltd. will prepare an Interim Corrective Action Report that will be put in place from the time of the incident until the time the full investigation is completed (30 days) to prevent a recurrence.

The Interim Corrective Action Report will identify the unsafe conditions, acts or procedures that resulted in the corrective actions, the interim corrective actions taken and the date that corrective action was completed. The supervisor will assign the interim corrective actions to the appropriate employees for implementation. After the implementation of interim corrective actions, the supervisor will follow up and ensure the corrective actions are effective.

The report must be provided to the JHSC or the worker safety representative.

### 10.6.3 Full Investigation Report

Scuka Enterprises Ltd. must undertake a full investigation immediately following the completion of the preliminary investigation. The Full Investigation Report will determine the incident's cause(s) and identify unsafe conditions, acts or procedures that significantly contributed to the incident.

There are no material changes to the content of the required reports. However, the Preliminary Investigation Report focuses on corrective action during the interim period until the full investigation is completed.

Employers are required to submit their Full Investigation Report to WorkSafeBC within 30 days of the incident. An initial extension, and additional extensions, to that time period may be granted by WorkSafeBC where the employer can demonstrate that delays in its ability to complete the investigation by the deadline are due to factors outside its control. This report must also be submitted to the JHSC for review and will be addressed at monthly safety meetings as well.

Scuka Enterprises Ltd. can choose to post the report at the workplace (with personal privacy considered).

#### 10.6.4 Full Corrective Action Report

Scuka Enterprises Ltd. must provide a copy of the report that outlines their full investigation's corrective action to the JHSC. This report must include:

- The corrective action taken to prevent the recurrence of similar incidents,
- The names and job titles of the persons responsible for implementing the corrective action following the full investigation, and
- The date the corrective action was taken.

The supervisor will assign the corrective actions found in the Full Corrective Actions Report to the appropriate employees for implementation. After implementing the corrective actions, the supervisor will follow up and ensure the corrective actions are effective.

\* NOTE: During the investigation and reporting, personal privacy should be considered. Therefore, include only personal information in the report that is relevant to the investigation. If personal information must be included in the report, and the report needs to be posted in a public place, please be considerate and remove all personal information.

### 10.7 Supervisor Training

It is important that Scuka Enterprises Ltd. ensures that all people who conduct investigations are qualified and competent to do so. Supervisors will be trained on how to:

- Complete an investigation of an incident, including recommendations for hazard control, follow-up and estimated cost,
- Collect investigation data,
- Evaluate collected data during an investigation,
- Write effective reports,
- Preserve evidence and keep an incident scene safe,
- Monitor and follow up on recommendations, and
- At the completion of training, a quiz will be administered to ensure knowledge is retained.

### 10.8 Investigation Review and Communication

#### 10.8.1 Management Review Process

All investigation reports will be reviewed and evaluated by the Joint Occupational Health and Safety Committee including the management members of that committee.

#### 10.8.2 Communication

Once the final investigation report has been completed and approved by Scuka Enterprises Ltd. and the JHSC, corrective actions will be posted and communicated to the appropriate employees.

All affected workers will be informed of the corrective actions from the Final Investigation Report at the next toolbox talk.

Scuka Enterprises Ltd. will ensure that corrective actions are posted in a high traffic area (near a time clock, bulletin board, in a lunchroom, trailers, etc.), where they are easily accessible and visible, protected from the elements and free of obstructions.

## **10.9 Reference Information**

### **Workers Compensation Act**

Part 2, Division 10, Section 68 through 73 – Employer Accident Reporting and Investigation

### **Occupational Health and Safety Regulations**

Part 3, Sections 3.1 to 3.3 – Occupational Health and Safety Programs; Part 3, Section 3.28  
Participation in Investigations

# 11.0 Emergency Preparedness

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## 11.1 Policy

This policy applies to all workers, site visitors and subtrades who may be present during an emergency. Emergency Response Plans (ERP's) coordinate actions to reduce losses and exposure to people, property and the environment, during and after an emergency. Employees will be trained so that they know their roles and responsibilities if an emergency occurs. Training for Emergency Response Plans will consist of instruction and mock drills. Using a mock drill, Emergency Preparedness plans will be tested for deficiencies on an annual basis. The deficiencies, along with the corrective actions taken, will be documented in a report on the Mock Drill.

## 11.2 Definitions

**Worksite** – operating site where Scuka workers or subtrades are expected to be working on a daily basis

## 11.3 Responsibilities

### Management

- Provides adequate first aid facilities, equipment and services,
- Ensures Emergency Response Procedures are developed and updated when operations change,
- Records and files all completed records for future reference during inspections and audits, and
- Initiates specific emergency procedures for their worksite(s) and will incorporate any client stipulations and requirements.

### Supervisor

- Ensures all workers are trained in Emergency Response Procedures for foreseeable emergencies,
- Ensures that the employees understand the Emergency Response Procedures specific to their position and current conditions,
- Ensures that all workers understand who the first aid attendant is and how to reach him/her,
- Annually executes and documents Emergency Response mock drills, and
- Communicates the results of the mock drill, such as corrective actions, to workers at the next safety meeting.

### Employee

- Knows the content and location of Emergency Response Plans,
- Follows Emergency Response Plans during all emergencies, and
- Knows his/her first aid attendants and how to contact them.

## 11.4 Developing Emergency Response Plans

To successfully reduce the risk of loss of people and property, Emergency Response Plans must be developed, implemented and practised. An emergency preparedness risk assessment will be completed for each worksite or operational situation in order to develop appropriate Emergency Response Plans for the work being done. Depending on the site location and nature of the work,

other Emergency Response Plans may be developed for earthquakes, floods, tornadoes, etc. All company locations will develop and post appropriate Emergency Response Plans, including a Fire Response Plan.

As required Scuka Enterprises Ltd. will create and document detailed Emergency Response Plans in the Procedures section or the Daily Hazard Assessment (JHA). Primary and secondary emergency stations for gathering personnel must be designated and identified so workers know where to gather in an evacuation. Emergency lighting will be installed in areas where risk assessments have shown that a lack of lighting would prove hazardous in the event of an evacuation.

An integral part of our emergency planning is to ensure that all workers and outside agencies are aware of the risk of an emergency that requires evacuation and the emergency response we have established in the workplace.

#### **11.4.1 Coordinating Responses to Emergencies**

Scuka Enterprises Ltd. has identified the positions and operational groups that are likely to be the recipients of emergency information and reports. In the event of an emergency, supervisors and subcontractors will communicate with outside agencies and first aid personnel, as required.

### **11.5 General Emergency Requirements**

All fuel and power shut offs and emergency exits will be clearly marked and kept free of obstructions at all times.

All emergency contact numbers will be kept up-to-date and made available to all workers during regularly scheduled work hours.

Appropriate emergency communication devices such as phones, horns or two-way radios will be kept readily available at each operational worksite as a means of:

- Alerting site personnel, and
- Contacting outside assistance.

The site supervisor or designate will maintain an awareness of the number of employees on site at all times and will be able to provide an accurate head count in the event of an emergency. Scuka Enterprises Ltd. will also ensure that appropriate arrangements are made to transport an injured worker to medical aid from the Worksite.

#### **11.5.1 Worksite Emergency Response Plan**

The site supervisor or designate will ensure a detailed Emergency Response Plan, specific to the needs of each regular worksite in operation, is created and posted in accordance with established procedure.

Plans will include but are not limited to:

- Site information,
- Emergency contact information (including directions to the nearest clinic or hospital),
- Key locations (first aid equipment and room, emergency personnel meeting point and muster stations),
- Instructions on how to call for first aid, and

- Fire response and evacuation information.

The site supervisor or Site Safety Coordinator will ensure that

- Directions to the nearest hospital or medical clinic are posted on the Safety Board, and
- Annual drills are held to ensure awareness and effectiveness of the Emergency Response Plan.

Scuka Enterprises Ltd. will ensure a written Fire Response Plan is posted in an accessible location. It will include, but is not limited to, the following information:

- Types and locations of fire extinguishers
- Diagram of the location
- Escape routes
- Communication devices

## 11.6 Fire Prevention

The site supervisor or Site Safety Coordinator will ensure that appropriate fire extinguishers are installed at readily visible key locations on all worksites.

In addition to this, fire extinguishers will be kept as required in mobile equipment.

### 11.6.1 Fire Extinguisher Inspection

Scuka Enterprises Ltd. will ensure that fire extinguishers are inspected on an annual and monthly basis. Annual inspection will be conducted by a qualified person or agency, while the site supervisor or designate will ensure that company-owned fire extinguishers are inspected monthly. Monthly inspection will be recorded on a tag on the fire extinguisher. Fire Extinguishers will be Class ABC type.

These guidelines are to be followed for the monthly fire extinguisher inspection:

- Know where all of the portable fire extinguishers are located, and document any that are missing so they may be replaced.
- When approaching a fire extinguisher, check that it is easy to see and not blocked by equipment or other objects that could interfere with access in an emergency.
- Make sure that the pin and safety seal or tamper indicator are intact and not broken.
- Ensure that pressure is at the recommended level. On extinguishers equipped with a gauge, the needle should be in the green zone—not too high and not too low.
- Examine the extinguisher for obvious physical damage, corrosion, leakage or a clogged nozzle.
- While you are examining the extinguisher, feel the weight. Does the unit feel full?
- Is the Workplace Hazardous Materials Identification System (WHMIS) label in place?
- Look at the maintenance tag attached to the extinguisher and verify that the last maintenance date was not more than 12 months ago.
- If all of the above conditions are met, initial and date the inspection tag.

When an inspection of a fire extinguisher reveals any deficiency take corrective action immediately.

## 11.7 First Aid Requirements

Scuka Enterprises Ltd. will complete a First Aid Assessment to determine adequate supplies, facilities and number of qualified first aid attendants for each operational worksite. The First Aid Assessment is available from WorksafeBC.

### 11.7.1 Equipment

First aid equipment, supplies, and facilities will be kept clean, dry, ready for use and readily accessible at all times when employees are on site.

### 11.7.2 Attendant's Qualifications

Each first aid attendant will:

- Be at least 16 years old,
- Have successfully completed the first aid training course or first aid examination developed or approved by the local OHS Regulatory Authority, and
- Have a first aid certificate in good standing at the required level issued in British Columbia or a person recognized by the local OHS Regulatory Authority.

The first aid attendant on duty will be physically and mentally capable of safely and effectively performing his or her required duties and will have his or her certificate available on site.

### 11.7.3 Proof of Certification

The attendant's certificate must be shown to the employer or the employer's representative before the attendant begins first aid duties. The attendant must have his or her certificate available at the workplace. The certificate must be produced for inspection at the request of an officer of the Board.

### 11.7.4 First Aid Records

Any time first aid is administered, or treatment advice is given to an injured worker a record of the injury or exposure, and of the treatment or advice given will be completed by the first aid attendant.

- First Aid Records will be kept as specified by Section 3.19 of the *OHS Regulation*. For more information please refer to Element 12: Records and Statistics.

## 11.8 Reference Information

### Occupational Health and Safety Regulations

Part 4, Sections 4.13 through 4.18 Emergency Preparedness and Response; Part 4, Sections 4.1 through 4.12 Buildings, Structures, Equipment and Site Conditions; Part 3, Sections 3.14 through 3.21 Occupational First Aid

## 12.0 Records and Statistics

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### 12.1 Policy

Scuka Enterprises Ltd. will maintain their records and statistics in compliance with Health and Safety Regulations.

A systematic approach to record keeping will provide a uniform method to record and measure leading and lagging statistics. Leading statistics are a measure of the company's activities that prevent and control injury, while lagging statistics are a measure of the company's past incidents and accidents. Incident and injury rates will be compiled in accordance with the CSA Standards.

This information will be used to evaluate the:

- Trends of employees' serious injuries,
- Cost to the injured employee (medical and compensation),
- Relative need for activities designed to promote safe work practices and procedures,
- Effectiveness of activities designed to promote safety activities, and
- Progress initiatives that are being developed to improve an employee's injury experience within their work environment.

Additionally, information will be used to assist in prioritizing injury prevention efforts.

### 12.2 Responsibilities

#### Management

- Ensures records and statistics are completed,
- Ensures statistical data is utilized to determine trends,
- Ensures that identified trends are corrected with effective strategies, and
- Reviews accident and incident statistics and reports in order to identify and implement corrective action.

#### Supervisor

- Leads the development and communication of a monthly action plan based on the findings of the statistical analysis, and
- Provides the Employer/Manager with the necessary information to complete the monthly statistics.

#### Employee

- Reports all relevant safety information to his or her supervisor.

### 12.3 Reports on File

The following list outlines some of the safety-related reports that are kept on file.

- First aid records,
- WorkSafeBC inspection reports,
- Incident investigation reports,

- Hazardous Substance Inventory and Safety Data Sheets (at the specific locations),
- Joint Occupational Safety and Health Committee meeting minutes,
- Logbooks on equipment,
- Maintenance records,
- Training records,
- Inspection reports,
- Orientations of workers and supervisors,
- Safe Work procedures, use of equipment and emergency procedures,
- Toolbox talk and safety meeting minutes,
- Supervisor and worker training records,
- Certification records,
- Occupational First Aid:
  - Hearing testing
  - Respirator fit testing,
- Hazard and risk assessments,
- Fire and emergency drills, and
- Claims and disability management records.

## 12.4 Retention of Safety Records

<b>Policy, Leadership and Administration</b>	
Notice of Project (NOP) WorkSafeBC and 30M33-Safe Work Permit from Electrical Provider	5 years
Health and Safety Policy Review	3 years
<b>Health and Safety Committee</b>	
Committee Minutes	2 years
<b>Supervision</b>	
Supervisor training records (legal requirements, inspection and investigation procedures, etc.,)	Length of employment plus 2 years
<b>Education and Training of Workers</b>	
Worker orientation record	Length of employment plus 2 years
Safe Work Practices and Safe Job Procedures	Current
Worker's SJP and SWP training and retraining records	Length of employment plus 2 years
Toolbox safety talk records	10 years

<b>Rules and Supplementary Instructions</b>	
Records of worker instruction in supplementary instructions	Length of employment plus 2 years
Records of rules and supplementary infractions and penalties	Length of employment plus 2 years
Records of worker safety suggestions	10 years
<b>Inspections</b>	
Planned Inspection Reports including corrective action documentation	10 years
Informal Inspection Reports including corrective action documentation	10 years
Safety Inspection Reports, Compliance Reports and Penalty Assessments	10 years
Maintenance records and mobile equipment logbooks	Life of vehicle plus 5 years
Daily inspection checklists	Life of vehicle
<b>Incident and Accident Investigations</b>	
Incident and Accident Investigation Reports	20 years

<b>First Aid</b>	
First aid records	3 years
First aid training and certification records	Length of employment plus 2 years
First aid treatment books	5 years following completion of book
Appropriate injury reporting forms and Claims Cost Statements	20 years
Monthly injury records	10 years
Frequency and severity rates	10 years
<b>Monitoring of Workplace Exposures and Health</b>	
Contaminant Inventory Forms	Current
Monitoring date and worker exposure records	Permanent
Medical surveillance records	Permanent
Corrective action records (control measure)	Permanent
<b>Emergency Preparedness</b>	
Documented drills	20 years
Records of actual emergencies	20 years
<b>Periodic Review</b>	
Health and Safety Program Review Report	10 years

## 12.5 First Aid Records

The First Aid Records must be:

- Kept for a period of at least 3 years.
- Accurately and legibly kept
- Accessible upon request by management or supervisors
- Available for inspection by a WorksafeBC officer
- Kept confidential and may not be disclosed except to authorized individuals
- Securely stored (locked) for the protection of all personal information as per the Personal Information Protection Act (PIPA)

Access to first aid records is restricted to individuals who require information for: medical treatment, workplace inspections, incident investigation, claims processing/appeals and for statistical purposes. Workers may request or authorize access to their first aid records for any treatment or report about themselves.

## 12.6 Health and Safety Activity Summaries

Scuka Enterprises Ltd.'s Health and Safety Activity Summaries are developed and maintained in the Reports-Custom section of the Safety Admin. After selecting the Custom section, summaries of leading indicators and lagging indicators can be viewed on a monthly, quarterly or annual basis.

## 12.7 Health and Safety Statistical Reports

Scuka Enterprises Ltd. will create statistical reports by totalling and analyzing the Health and Safety Activity Summaries. These reports will be generated on an ongoing basis and will be made readily available to the JHSC and Management, as required.

### Frequency Rate

The Injury Frequency Rate is the number of injuries that employees sustain during a given number of work hours, and indicates the safety of working conditions. The Frequency Rate is calculated as follows:

$$\frac{\text{Number of recordable cases} \times 200,000}{\text{Number of employees: hours of exposure}}$$

### Severity Rate

A recordable case is an injury incident that results in one or more lost workdays other than the day of the incident. The Injury Severity Rate is calculated as follows:

$$\frac{\text{Number of workdays lost} \times 200,000}{\text{Number of employees: hours of exposure}}$$

## 12.8 Review Process

Utilizing the Health and Safety Activity Summaries and Statistical Reports (leading and lagging indicators), Scuka Enterprises Ltd. will compare health and safety performance year to year. These comparisons will be reviewed on an annual basis at the Joint Health and Safety Committee (JHSC) meetings or management meetings. This will be documented and recorded.

The analysis of annual statistics will be reviewed at the JHSC meetings or Management meetings to identify and record trends or needs for improvement to Scuka Enterprises Ltd.'s safety program. This will be documented in the meeting minutes on PROCORE.

## 12.9 Reference Information

### WorkSafeBC Regulations

Part 3, Sections 3.1 to 3.3 – Occupational Health and Safety Programs; Part 3, Section 3.19 – First Aid Records

# 13.0 Legislation

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## 13.1 Policy

Legislation from multiple levels of government provides guidance for the Health and Safety Program. One key piece of legislation is the Workers Compensation Act and the Occupational Health and Safety Regulations. Scuka Enterprises Ltd. is committed to complying with legislation. This compliance is also required of any individual or organization conducting any activity on Scuka Enterprises Ltd.'s property or project.

Scuka Enterprises Ltd must ensure:

- Management and supervisors know and follow the Workers' Compensation Act requirements for incidents and accident reporting. Please refer to Element 10: Investigations & Reporting for more information.
- Workers are aware of their rights and responsibilities and how to exercise them, and
- Notices are posted in accessible high traffic areas that indicate where employees can find and review relevant legislation.

## 13.2 Responsibilities

### Skuka Enterprises Ltd.

- Actively encourages all managers, supervisors, workers and contractors to comply with company, industry and government rules and regulations.

### Supervisor

- Refers to relevant legislation during the job planning and bidding stage, and
- Demonstrates a commitment to safety by following regulations consistently.

### Worker

- Demonstrates a commitment to safety by following regulations consistently.

## 13.3 About Legislation

The federal and provincial governments legislate health and safety regulations and laws within their jurisdictions. This legislation covers various health and safety duties for employers and workers and provides laws which protect the rights of workers.

Comprehensive regulations and codes exist which address various types of workplace hazards that have been adopted under these laws. The acts, regulations and codes promote a system of self-compliance. When self-compliance fails, the government can enforce mandatory compliance.

### 13.3.1 Section 217.1 of the Criminal Code of Canada

Amendments to the *Criminal Code of Canada* in 2004 (Bill C-45) also included the right for police to conduct a criminal investigation of a workplace accident. Criminal negligence can result in a possible charge under section 219 of the Criminal Code against the organization, the managers or the senior management, if an investigation finds that there was reckless disregard for worker or public safety. Section 217.1 of the Criminal Code creates an occupational health and safety duty for all organizations and individuals who direct the work of others in Canada. It requires all

organizations and individuals who undertake or have the authority to direct how others work or perform a task, to take all reasonable steps to prevent bodily harm to the person performing the work or task, and to any other person. There have been convictions for work related deaths pursuant to these sections, and those convictions have resulted in prison terms. See for example R v Kazenelson, 2018 ONCA 77.

### 13.3.2 Legislation Based on Geography

The acts, regulations and codes associated with Occupational Health and Safety cover various topics including fall protection, first aid requirements, asbestos safety and many more.

There is little consistency between the acts, regulations and codes of provinces and territories; therefore, it is very important that workers become familiar with the acts, regulations and codes relevant to their location. Scuka Enterprises Ltd. must use the federal and provincial/territorial acts, regulations and codes relevant to their location(s) as the building blocks of a company's health and safety program.

The foundation of the *Occupational Health and Safety Acts*, regulations and codes in the various jurisdictions is based on the concept of the Internal Responsibility System. This system establishes the shared responsibility between the employer, supervisor, employee, contractor, etc., for health and safety at the workplace. Thus, the program must address the pertinent health and safety rights, roles and responsibilities of both the employer and workers.

## 13.4 Workers' Rights

Workers have the right to know the hazards in the workplace, the right to participate in workplace health and safety activities and the right to refuse unsafe work without being disciplined or fired.

### 13.4.1 Procedure for Right to Refuse to Work OR Reporting Unsafe Conditions

If a worker has reasonable cause to believe that any work process would create an undue hazard to the health and safety of any person, the individual has the right to refuse work. Under such circumstances, WorkSafeBC indicates that the following order of actions must take place:

#### Step One: Immediately Report Unsafe Condition or Procedure

- A worker must immediately report the circumstances of the unsafe act or condition to the supervisor or employer, and
- A supervisor or employer who receives the report must immediately investigate the matter and ensure that any unsafe condition is remedied OR if the supervisor's or employer's opinion is that the report is not valid, then he or she must inform the person who made the report.
- If the employer or supervisor believes the work can safely be done by another worker while the matter is under investigation, they must:
  - Give notice in writing to the workers assigned or permitted to do the work
  - Give notice in writing to a worker representative of the joint health and safety committee, a union representative, or other worker, as applicable
- Ensure the written notice includes:
  - The refusal and the reported unsafe condition
  - Reasons why the task would not create an undue hazard
  - The workers' right to refuse the work
-

## Step Two: Investigation

If a worker still views work as unsafe after a supervisor or employer has said it is safe to perform a job or task, a supervisor or employer must investigate the matter.

- This investigation must be carried out in the presence of the worker who made the report and in the presence of a worker representative of the Joint Health and Safety Committee (JHSC) OR a worker who is selected by a trade union representing the worker. If there is no joint committee or the worker is not represented by a trade union, any other reasonably available worker must be selected by the worker who made the report, and
- If the matter is still not resolved, management shall investigate and either develop a plan that is acceptable to the persons who will do the work, and which will allow the work to proceed safely, or suspend further work, and
- If other persons are assigned to do the work they must be informed of the initial refusal and the reasons for that refusal.
- If the work is suspended or allowed to proceed, management must submit a report to the Occupational Health and Safety Committee, local union and an inspector, that describes any remedial actions taken.

## Step Three: Notification

- If this matter is still not resolved and the worker continues to refuse to carry out a work process, both the supervisor or employer and the worker must immediately notify a provincial regulatory body officer to investigate the matter and take whatever actions are necessary, and/or
- No worker is to be disciplined for acting in compliance with these steps. The worker is assigned temporary alternative work at no loss in pay until the matter is resolved. This is not considered to be disciplinary action.

## 13.5 Workers' Responsibilities

- Be aware of hazards and report them immediately to your supervisor or employer.
- Always follow safe work procedures and act safely in the workplace at all times.
- Properly wear the protective clothing and use devices and equipment provided.
- Cooperate with Joint Occupational Health and Safety Committees, worker health and safety representatives, WorkSafeBC prevention officers and anybody with health and safety duties.
- If injured on the job, get treated quickly and tell the health care provider that the injury is work related.
- Follow the treatment advice of health care providers.
- After an injury, return to work safely by modifying your duties and not immediately starting with your full, regular responsibilities.
- Never work under the influence of alcohol, drugs or any other substance, or if you're overly tired.

## 13.6 Reference Information

### Criminal Code of Canada RSC 1985

Section 217.1 Duty of persons directing work

### Workers Compensation Act

Part 2, Division 1, Sections 13 through 16 – Interpretation and Purposes

**WorkSafeBC Regulations**

Part 2, Section 2.1 to 2.8 – Applications

# 14.0 Joint Health and Safety Committee

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## 14.1 Policy

The Joint Occupational Health and Safety Committee (JOHS) must be maintained at all times, consistent with the requirements of the Terms of Reference. All workplaces with 20 or more employees require a Joint Health and Safety Committee. If there are 10 to 19 employees at the same workplace, a Worker Representative(s) is required to ensure there is two-way communications about safety related issues between employees and the company.

The membership of the Committee is comprised of at least two (2) worker representatives and two (2) management representatives. The purpose of the committee is to identify potential dangers and hazards in the workplace and to recommend a means of improving health and safety programs and practices within the organization.

Scuka Enterprises Ltd. fully supports the work of the JOHS Committee in making our company a safer place to work and endeavors to cooperate whenever possible. All senior management, supervisors and employees are expected to extend their full cooperation and support to the committee and its individual members.

## 14.2 Responsibilities

Scuka Enterprises Ltd. regards the JHSC as a high priority. Assisting and supporting the work of the JHSC ensures practices and procedures within the company that represent a safe workplace. The training and communication of the JHSC is a shared responsibility for all employees and requires cooperation and collaboration between all management and personnel.

## 14.3 Terms of Reference

### 14.3.1 Name of Committee

The committee shall be known as the Joint Occupational Health and Safety Committee.

### 14.3.2 Constituency and Composition of the Committee

The JOHS Committee member represents their portion of the work group. The selection and membership of these members should accurately represent their workforce. The committee shall be comprised of:

- Four regular members, employed full-time, selected to represent the workers and the employer.
- Management representatives should not exceed the number of worker representatives.
- Where a member is unable to attend a meeting that member may select an alternate employee of the company to attend on their behalf. The person selected as an alternate shall be of the same class of employee, whether management or worker, as the person who is unable to attend.

- Co-chairs: The committee will elect co-chairs from its membership.
  - i. The worker representatives shall select a co-chair.
  - ii. The employer representatives shall select a co-chair.

### **14.3.3 Purpose of the Committee**

A joint committee is required by the *Workers Compensation Act* and is made up of worker and employer representatives consulting in a cooperative spirit to identify and resolve safety and health issues in the workplace. They support a planned occupational health and safety program in the place of employment.

### **14.3.4 Duties and Function of the Joint Health and Safety Committee**

As required by section 36 of the *Workers Compensation Act*, the duties and functions of the committee are to:

- a) Identify situations that may be unhealthy or unsafe for workers and advise on effective systems for responding to those situations.
- b) Consider and expeditiously deal with complaints relating to the occupational health and safety of workers.
- c) Consult with workers and the employer on issues related to occupational health and safety and its environment.
- d) Make recommendations to the employer and the workers for the improvement of the occupational health and safety of workers and compliance with the regulations, and monitor their effectiveness.
- e) Make recommendations to the employer on educational programs promoting the health and safety of workers and compliance with the WorksafeBC Regulations, and monitor their effectiveness.
- f) Advise the employer on programs and policies required under the Regulations for the workplace and monitor their effectiveness.
- g) Advise the employer on proposed changes to the workplace or the work processes that may affect the health or safety of workers.
- h) Ensure that incident investigations and regular inspections are carried out as required by the Regulations.
- i) Participate in inspections, investigations and inquiries as provided by the Regulations.
- j) Select appropriate worker and employer representatives to participate in preliminary and full incident investigation processes.
- k) Review and provide feedback on any corrective action reports resulting from incident investigations.
- l) When necessary, request information from the employer about:

- i. Known or reasonably foreseeable health or safety hazards to which workers at the workplace are likely to be exposed
- ii. Health and safety experience and work practices and standards in similar or other industries of which the employer has knowledge
- m) Must discuss the annual written evaluation of the joint committee as required by section 3.26 of the OHS Regulations at a joint committee meeting and ensure that the evaluation and a summary of the discussion are included in the report of that meeting.
- n) Carry out any other duties and functions prescribed by the Regulation.

#### **14.3.5 Records and Reports**

The committee must keep accurate records of all matters that come before it. The committee maintains copies of its minutes for a period of at least 2 years from the date of the joint health and safety committee meeting to which they relate.

Under the mandate of this joint committee, the employer will make the following records and reports available to the committee upon request:

- Incident investigation reports
- Corrective action reports
- Inspection reports
- OHS-related training records
- Company health and safety program
- Safe work practices and procedures
- Manufacturers' specifications
- First aid statistics
- Time-loss injury statistics

The employer will consider and make reasonable efforts to comply with all requests made for documentation not specified within the rules of procedure.

#### **14.3.6 Meetings**

- a) The employer will supply the resources required to facilitate a meeting, including a note-taker to document the minutes of the meeting.
- b) The committee will meet monthly.
- c) Special meetings, when required, will be held at the call of the co-chairs.
- d) A quorum shall consist of one employer representative and two employee representatives. If quorum is not met the co-chairs will call a special meeting.

- e) The committee co-chairs are responsible for securing meeting rooms, coordinating with administrative staff, and any other logistical issues that may impact the meeting.
- f) The committee will add procedures it considers necessary for the meetings.

#### **14.3.7 Role of the Co-chairs**

The worker representatives shall select a co-chair. The employer representatives shall select a co-chair. The co-chairs responsibilities include:

- a) Facilitating the meetings.
- b) Reviewing previous meeting reports and material prior to the meetings.
- c) Notifying members of meetings.
- d) Reviewing meeting agendas.
- e) Reviewing meeting reports.
- f) Forwarding a copy of meeting reports to the employer for distribution.
- g) Preparing recommendation(s) and forwarding them to the employer for a response.
- h) Preparing all correspondence.
- i) When called upon by the employer, identifying employer representatives and worker representatives to participate in incident investigations.

#### **14.3.8 Role of the Members**

The members shall:

- a) Be selected in accordance with section 128 of the *Workers Compensation Act*
- b) Actively participate
- c) Come prepared and on time for meetings
- d) Maintain confidentiality

#### **14.3.9 Guests**

- a) Guests can be invited to committee meetings at the request of the co-chair(s).
- b) Guests attending committee meetings must be there for the purposes of:
  - i. Training
  - ii. Making a presentation
  - iii. Consultation

#### **14.3.10 Agendas and Meeting Minutes**

- a) The agenda will be determined by the co-chairs.

- b) The agenda and any other required documentation will be prepared by the co-chairs and distributed to committee members prior to the meeting. Whenever possible, the agenda should be emailed five days in advance of the meeting.
- c) A report of the meeting will be prepared as soon as possible after the meeting and will be made available to the employer, joint health and safety committee members and workers.
- d) A copy of the report of each meeting will be posted promptly, in a place readily accessible to employees for whom this committee is responsible.

#### **14.3.11 Terms of Office**

- a) Committee members will sit on the committee for two years.
- b) Committee selection should occur twice a year to encourage overlap between new and experienced committee members.
- c) If a member of the committee chosen by the workers is unable to complete the term of office, the workers will choose another member.
- d) If a member of the committee appointed by the employer is unable to complete the term of office, the employer will appoint another member.
- e) All members must arrange to have an alternate member or agent designated by them to attend meetings in their place, when they are unavailable to attend.

#### **14.3.12 Participation in Investigations**

- a) When an investigation is required it is important that a worker be involved in the investigation. Ideally, a worker member of the Joint Committee will participate, most commonly the Worker co-chair.

#### **14.3.13 Recommendations to the Employer**

- a) Recommendations to the employer must be:
  - i. Directly related to health and safety
  - ii. Doable (reasonably capable of being done)
- b) Informal recommendations that can be actioned by the employer co-chair will be documented in the meeting minutes.
- c) Where formal written recommendations are sent to the employer with a written request for a response from the employer the employer shall respond within 21 days, and may either:
  - a. Indicate acceptance of the recommendation, or
  - b. Give the employer's reasons for not accepting the recommendation.

#### **14.3.14 Decision-Making Model**

This committee will make decisions based on consensus. If the committee is unable to reach agreement on a matter relating to the health or safety of workers at the workplace, a special meeting will be called to address the matter. If the issue is still unresolved, the co-chairs of the committee will report this to WorkSafeBC for assistance in investigating and resolving the matter.

#### **14.3.15 Education and Training**

All new members appointed on or after April 3, 2017, will participate in an introductory joint committee course. The co-chairs will assist new members in selecting the appropriate training course. The employer co-chair will ensure that the training selected reflects the requirements of section 3.27 of the Regulation.

Every member of the joint committee is entitled to eight hours of education leave. For this committee, individual members can request their entitlement training during regular meetings. Individual members must provide the following information about the training program or seminar selected:

- Length of the program
- Topic and learning outcomes (if applicable)
- Fees
- Rationale for selection

If the committee agrees with the member, the request will be forwarded to the employer. If the committee does not agree with the training selected, the co-chairs will hold a special meeting with the member to assist in identifying a training program or seminar that supports the duties and functions of this committee.

### 14.3.16 Evaluation of Joint Health and Safety Committees

Section 3.26 (2) Occupational Health and Safety Regulation states:

An employer must ensure that, with respect to each of the employer's joint committees, a written evaluation is conducted annually by

(a) the co-chairs of the joint committee or, with respect to each co-chair, the member or members of the joint committee designated by the co-chair, or

(b) the employer or a person retained by the employer.

(3) The evaluation must contain, but is not limited to, the following information:

(a) whether or not, throughout the period of time that is the subject of the evaluation,

(i) the joint committee met the membership requirements under section 33 of the Workers Compensation Act,

(ii) worker representatives on the joint committee were selected in accordance with section 34 of the Workers Compensation Act,

(iii) employer representatives on the joint committee were selected in accordance with section 35 of the Workers Compensation Act,

(iv) the joint committee fulfilled each of its duties and functions under section 36 of the Workers Compensation Act,

(v) the joint committee met regularly as required under section 37(2) of the Workers Compensation Act,

(vi) the employer met the requirements under section 39 of the Workers Compensation Act in respect of the written recommendations sent to the employer by the joint committee with a written request for a response from the employer, if any,

(vii) each member of the joint committee received the time off from work the member was entitled to receive under section 40 of the Workers Compensation Act,

(viii) each member of the joint committee attended the occupational health and safety training courses the member was entitled to attend under section 41 of the Workers Compensation Act, February 2017 Page 2

(ix) the employer provided to the joint committee the equipment, premises, clerical personnel and information the employer was required to provide under section 42 of the Workers Compensation Act,

(x) the joint committee prepared reports of its meetings and provided copies to the employer as required under section 43(1) of the Workers Compensation Act,

- (xi) the employer met the requirements of posting and keeping posted committee information as set out in section 44 of the Workers Compensation Act, and
  - (xii) each member of the joint committee received the instruction and training the employer was required to ensure was provided to the member under section 3.27 of the Worksafe Regulations;
- (b) an assessment of the effectiveness of the joint committee's rules of procedures as established under section 37(1) of the Workers Compensation Act;
  - (c) an assessment of the overall effectiveness of the joint committee.
- (4) If the employer, or a person retained by the employer, conducts the evaluation, the employer or person retained by the employer, as the case may be, must, as part of the evaluation, obtain and consider the input of the co-chairs of the joint committee or, with respect to each co-chair, the member or members of the joint committee designated by the co-chair, on the matters listed in subsection (3).
- (5) The employer and the joint committee must each provide to the other a copy of the evaluation if the other does not have a copy.
- (6) The joint committee must:
- (a) discuss the evaluation at the joint committee meeting immediately following
    - (i) receipt of the evaluation, if the employer or a person retained by the employer conducts the evaluation, or
    - (ii) the completion of the evaluation, if members of the joint committee conduct the evaluation, and
  - (b) ensure that the evaluation and a summary of the discussion referred to in paragraph (a) are included in the report of that meeting.

### **14.3.17 Amendments**

These terms of reference may be amended by a majority vote of the committee members.

## **14.4 Reference Information**

### **Workers Compensation Act**

Part 2, Division 5, Section 31 to 46 – Joint Committees and Worker Representatives; Part 2, Division 10, Sections 68 through 73 – Accident Reporting and Investigation

### **Occupational Health and Safety Regulations**

Part 3, Section 3.26 through 3.27 Joint Health and Safety Committees; Part 3, Section 3.28 Participation in Investigations; Part 3, Section 3.5 through 3.8 Workplace Inspections

# 15.0 Bullying and Harassment

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## 15.1 Policy

Scuka Enterprises Ltd. is committed to maintaining a workplace that is free of bullying and harassment.

Scuka Enterprises Ltd. will not tolerate bullying or harassment in the workplace. Where bullying or harassment is found to have occurred the Company will take appropriate remedial action.

The purpose of this Policy is to assist all Scuka Enterprises Ltd. workers in identifying and preventing bullying and harassment in the workplace, and to provide procedures for reporting, investigating, and resolving incidents and complaints of bullying or harassment.

This Policy is not intended to constrain normal social interaction that does not amount to harassment.

This Policy applies to all employees and contractors of Scuka Enterprises Ltd. It applies in all situations where activities are connected to work with the Company including during and outside of business hours and to all locations where the Company's business activities take place. This includes, but is not limited to:

- Activities on the Company's premises;
- Work assignments away from the Company's premises;
- Work related conferences, course and seminars; and
- Work related social functions and gatherings.

## 15.2 Definitions

**Bullying and Harassment** includes any inappropriate conduct or comment by a person towards a worker that the person knew or reasonably ought to have known would cause that worker to be humiliated or intimidated, but excludes any reasonable action taken by an employer or supervisor relating to the management and direction of workers or the place of employment.

**Worker** includes any individual, whether or not they are a workplace party. This means that a person could be a workplace party such as an employer, supervisor, or co-worker, or a non workplace party such as a member of the public, a client, or anyone a worker comes into contact with at the workplace.

Examples of conduct or comments that may constitute bullying or harassment include but are not limited to:

- Sexual harassment
- Negative / unwanted physical contact
- verbal or written aggression or insults
- cyber-bullying
- calling someone derogatory names
- harmful hazing or initiation practices

- vandalizing personal belongings
- spreading malicious rumours

## 15.3 Responsibilities

### Management

- Takes corrective steps, including ensuring resources are in place in an appropriate and consistent manner to address all educational issues pertaining to bullying and harassment
- Ensures supervisors are adequately trained to understand bullying and harassment issues

### Supervisor

- Educates the workforce in a positive and constructive manner,
- Provides instructions to workers
- Measures workers' knowledge and competency
- Evaluates and monitors all training activities daily,
- Holds toolbox talks and safety meetings as required by policy.

### Worker

- Behave in an inclusive and professional manner
- Ensure they have read and understand this Policy
- Not engage in harassing conduct or behaviour
- Report incidents of harassment they observe or experience

## 15.4 Report/Complaint Procedures

1. Reports or complaints of bullying and harassment should be made as soon as possible following an incident. You may report an incident or file a complaint with your direct supervisor. If you are not comfortable reporting or making the complaint to your supervisor, you should report the incident or file the complaint with another Supervisor.
2. Reports or complaints of harassment should be made in writing. When submitting a written report or complaint, you can use the workplace harassment Complaint Form. The report/complaint should include your name; the name of the alleged harasser; the name of the target of harassment; the date(s), time(s), location(s) and other specifics of the alleged incident(s); and the names of possible witnesses. You should also attach any supporting documents, such as emails, handwritten notes, or photographs.

## 15.5 Investigation Procedures

1. Once a report or complaint is made the supervisor who the report or complaint was made to will inform the Supervisor of the person making the report or complaint unless that person's Supervisor is the subject of the report or complaint.
2. The Company, where appropriate, may pursue options for informal resolution of a report/complaint before moving the matter into a formal investigation process.
3. Investigations will be conducted promptly and diligently, and will be as thorough as necessary, given the circumstances.
4. Most investigations will be conducted internally. In complex or very sensitive situations, an external investigator may be engaged.

5. Investigations will usually include interviews with the complainant, the alleged respondent, and any witnesses.
6. In order to conduct a thorough and fair investigation, the respondent will be provided with the complainant's name, and information on the particulars of the complaint, and will be given an opportunity to respond.
7. Following the investigation, the Company will determine whether there has been a breach of this Policy and what remedial action to take including any disciplinary measures.
8. If the investigation fails to find sufficient evidence to support a finding of bullying or harassment in breach of this Policy, but inappropriate personal interactions have occurred, the Company may take remedial action. This may include providing direction and supervision to the affected workers, providing training to facilitate an understanding of appropriate personal interactions and management of difficult situations, and imposing workplace arrangements that minimize the risk of bullying or harassment, but exclude disciplinary measures.
9. If the investigation results in a finding of bullying or harassment in breach of this Policy, the Company will take remedial action which may include disciplinary measures up to and including dismissal for just cause.

## 15.6 Frivolous or Vexatious Complaints

Frivolous or vexatious complaints are those where there is no foundation in fact that amounts to bullying or harassment and where the complaint is filed for improper purposes. Such complaints in and of themselves are a breach of this Policy, and any worker engaged in reporting or filing of such a complaint may be subject to discipline up to and including dismissal for just cause. A finding that a complaint is not supported or that there has not been a breach of this Policy does not necessarily mean that the complaint was frivolous or vexatious.

## 15.7 No Retaliation

Retaliation, harassment or discrimination against an individual who in good faith makes a Complaint is strictly prohibited and will be treated as serious misconduct subject to discipline up to and including dismissal for just cause.

## 15.8 Training

New workers will be provided with a copy of this Policy and will receive additional training as part of toolbox talks and company wide meetings. Additional and follow up training will be conducted as and when the Company deems necessary or advisable.

## 15.9 Record Keeping

The Company will keep a record of complaints, investigations and findings.

## 15.10 Annual Review

This Policy and its procedures will be reviewed annually.

## 15.11 Reference Information

### Workers Compensation Act

Part 4, Division 1, Section 135 – Mental Disorder

# 16.0 Violence in the Workplace

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## 16.1 Policy

The purpose of this policy is to ensure that Scuka Enterprises Ltd. does all that is reasonably practicable in ensuring an environmentally healthy, safe and productive workplace that is free of violence. This program applies to all employees, contractors and visitors.

## 16.2 Definitions

### Workplace Violence

Workplace violence means the attempted or actual exercise by a person of any physical force so as to cause injury to a worker, and includes any threatening statement or behaviour which gives a worker reasonable cause to believe that the worker is at risk of injury.

## 16.3 Responsibilities

### Employer

It is the responsibility of the employer to:

- Make resources available for the communication and enforcement of the rules.
- Maintain control, responsibility and accountability to provide a proper work environment and ensure that follow up procedures are in place to ensure workers are complying with rules.
- Ensure investigations are conducted for all reported incidents of violence.

### Safety Management Team

It is the responsibility of the Safety Management Team to:

- Ensure a violence policy has been written and that the policy is readily available to workers.
- Involve the workers in the development and/or review of this policy.
- Conduct regular inspections of their area of responsibility, to ensure safety rules are being followed.
- Enforce the use of established safety rules.
- Take the appropriate action when the rules are not followed. Report to the management personnel if disciplinary action is necessary to ensure compliance.
- Investigate all reports of violence.
- Ensure that the regulations are adhered to.

### Project Management Team

It is the responsibility of the project management team to:

- Promote Scuka Enterprises Ltd. health and safety rules and maintain a positive attitude.
- Demonstrate a commitment to following the company's health and safety rules on a consistent basis.
- Ensure the company's Violence in The Workplace Policy is prominently posted.
- Assist employees in understanding the need for a policy on violence in the workplace and the consequences when established safety rules and requirements are not followed.
- Reports all incidents of violence to the safety management team and the employer immediately.

## Workers

All workers will follow the safety policy for violence in the workplace. Specifically, they:

- Understand the safety rules or ask the supervisor for clarification.
- Know how to access the safety policy for violence.
- Report any issues regarding violence to the supervisor as soon as possible.
- DO NOT support or condone violence in the workplace.

## Contractors

It is the responsibility of the contractors to:

- Abide by Scuka Enterprises Ltd.'s health and safety rules.
- Demonstrate a commitment to following the company's health and safety rules on a consistent basis.
- Assist employees in understanding the need for a policy on violence in the workplace and the consequences when established safety rules and requirements are not followed.
- Reports all incidents of violence and harassment to the safety management team and the employer immediately.

## Visitors

It is the responsibility of the visitors to follow all safety rules and report any violence in the workplace.

## 16.4 Workplace Violence Prevention

### 16.4.1 Risk Management

Scuka Enterprises Ltd. will conduct a workplace assessment to identify potential exposure to violence for each work area including office, shop, and worksites.

These assessments will focus on identifying the areas and positions within the company where there is a risk of potential violence. We will review previous incidents of violence and reports of possible violence by regulatory agencies.

Based on the results of the assessment the company will develop strategies to safeguard employees who occupy the identified high-risk positions and work environments.

Scuka Enterprises Ltd. will communicate the results of the risk assessment to the Joint Health and Safety Committee with a copy of the written assessment and recommendations for prevention.

Scuka Enterprises Ltd. will reassess the risks of workplace violence yearly to ensure that policies and programs continue to protect employees.

### 16.4.2 Training & Communication

All workers will be provided with a copy of this policy as part of their orientation. Additional training will occur as part of toolbox talks and company wide meetings.

### 16.4.3 Leadership & Team Building

Leadership on the project sets the tone and the limits for allowable conduct. Scuka Enterprises Ltd. will place a high priority on analyzing our leadership and providing training and support as necessary to establish and maintain a safe and violence free workplace.

If any employee feels that the team dynamic is not effective, they are to report to the safety manager. The manager will investigate, review results with management and committee members and finally with employees.

### 16.4.4 Safety Rules and Non-Compliance

Safety rules and non-compliance issues must be implemented and addressed. Violence may lead to immediate termination. See element five of this safety program for further details and for specific regulations review the WorksafeBC Regulations at sections 4.78 through 4.31.

## 16.5 How to Report Violence

If you have experienced any form of violence, threat, or suspected threat of violence in the workplace, or you have witnessed, or have reason to believe that another employee has been subject to acts of violence, you must immediately take the following steps:

- Be proactive and report the incident. Alert your immediate supervisor, or their immediate supervisor if not available or a member of senior management. Reports can also be made to the safety manager.
- If a member of management is informed of a concern about threats of violence or actual violence, they must contact the safety manager immediately for assistance with the investigation and resolution of the complaint.
- Document the incident – take detailed written notes or otherwise record each incident, including the date, time, place and details of what was said and done, names of possible witnesses and the surrounding circumstances.
- If you are comfortable doing so, clearly communicate to the individual that his or her behavior or conduct is unwelcome and unacceptable.
- Cooperate with the investigation so that corrective and protective measures can be implemented as quickly as possible.

## 16.6 Privacy

Scuka Enterprises Ltd. recognizes that it may be difficult to come forward with complaints of this nature and will make every reasonable attempt to ensure that the privacy of the persons involved in a complaint is protected. To the extent practical and appropriate under the circumstances, confidentiality will be maintained subject to the overriding responsibility of our company to investigate and deal with complaints and act in accordance with the requirements of the Workers Compensation Act and Occupational Health and Safety Regulations.

## 16.7 Investigation

Investigation of the complaint will be conducted by the company safety manager, or their designate and a representative from Human Resources or designate and / or other members of Management as may be appropriate. Scuka Enterprises Ltd. may also direct an independent third-party investigation including involvement of the police as part of the investigation as deemed necessary.

Throughout the investigation, it may become necessary to interview other witnesses or individuals in order to obtain information relevant to the investigation. In all cases, such investigation will be handled in as discreet and confidential manner as possible.

In the event that the investigation reveals that a manager or supervisor of the offender, or any other member of management, had knowledge of the situation and had not taken steps to resolve the situation, or failed to report this behavior to Human Resources, disciplinary action will also be initiated against the manager or supervisor involved.

At the conclusion of the investigation, the lead investigator will make one of the following findings:

- The concern was substantiated;
- The situation was resolved; or
- The concern was not substantiated.

Once the investigation is completed a written summary will be forwarded to the Joint Health and Safety Committees. Management will also be provided with a copy of the report and may then proceed to address the conduct as set out in part 5 of the Occupational Health and Safety Manual.

## **16.8 Reference Information**

### **Workers Compensation Act**

Part 3, Division 12 Enforcement

### **WorkSafeBC Regulations**

Part 4, Sections 4.25, and Sections 4.27 through 4.31 General Conditions: Violence in the Workplace;