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Health and Safety Plans: A Guide to Some of the Available Resources

Disclaimer

This Guide is presented solely as an aid to be used in surveying some of the possible resources that may be useful to companies for the purpose of developing a Health and Safety Plan. While best efforts have been used in preparing this Guide, the Line Contractors Association of BC ("the LCA") makes no representations or warranties of any kind and assumes no liabilities of any kind with respect to the accuracy or completeness of the Guide and specifically disclaims any implied fitness of use for a particular purpose. Moreover, changes in regulations or other requirements may occur over time which impose additional requirements for health and safety plans, or alter the applicability of the information contained herein. The LCA assumes no responsibility for maintaining the currency of this Guide, and does not assume any obligation whatsoever to inform the readers of this Guide of any changes that may impact the accuracy, relevance or applicability of this Guide to any health and safety plan or situation. The LCA shall not be held liable or responsible to any person or entity with respect to any loss or incidental or consequential damages caused, or alleged to have been caused, directly or indirectly, by the information contained herein. Every company is different and the information contained herein may not be suitable for your situation. You should seek the services of a competent safety professional before developing or beginning any Health and Safety Plan or Health and Safety Program.

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Executive Summary

In essence, this Safety Resource Guide is a survey of *some* of the resources available at WorkSafeBC, BC Hydro, and the Canadian Centre for Occupational Health and Safety that you may find useful as an aid to developing your company's specific health and safety plan. This Guide is not complete. To meet your company's needs, you may also need to consult other resources related, for example, to working in mines. The resources cited here may serve as a useful starting point.

Your company's health and safety plan expresses your company's commitment to health and safety. It is not a document to be written and then filed away. It is to be acted upon and kept current.

Your health and safety plan is intended to support a culture of safety at your company. Neglecting any portion of your health and safety plan could give create an impression that safety is only something your company gives lip service to rather than a core value that defines the safe conditions under which your employees work. Article 11.2 of the Collective Agreement with IBEW 258 draws attention to the fact that worker safety is never to be compromised:

> "The safety and well-being of employees shall be considered at all times in deciding what work is to be performed during inclement weather such as rain, snow, icing, or severe cold. No pay will be lost due to the inclement weather, except that any employee who chooses not to perform duties assigned to them shall not be paid for time lost as a result of their own decision. Any such employee may, however, claim pay for the time so lost through the grievance procedure on the basis that the duties they chose not to perform should not have been assigned to them in view of weather conditions existing at the time."

The safety culture you promote within your company needs to reflect a culture in which, whenever there is a choice between safety and anything else, safety wins: and your workforce needs to have this message communicated to them.

For any situation where a safety concern may arise, your company should have a clearly articulated communications plan for how the worker(s) feeling that concern may obtain support or advice from someone within your company qualified to provide that support or advice. In practical terms, this means, at the very least, that there are rules governing the use of communications devices in the field, and that workers in the field know how, and with whom, to communicate when they feel a safety concern.

Whatever form your health and safety plan may take, it is important to include regular safety meetings, crew inspections, proper job planning, supervision, and tailboard discussions. Please note that a fresh tailboard is required whenever there is a change in work methods and/or hazards. Any change in the level of risk requires a new tailboard discussion before the work is to proceed.

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It is also of critically important to maintain proper records for all of the activities performed under the provision of your safety plan. This is needed for two reasons:

1. Maintaining such records ensures that your company is doing the things it needs to do to sustain the safest possible workplace for its employees
2. Having these records will help to prove due diligence in the event of a safety incident that requires investigation

Some people may feel that the most important thing is to work safely, not to keep records to show that one is working safely. Although no one would dispute the central importance of working safety, it is also important to know that one is working safely and to be able prove it if required. There is a well-documented study which shows that, when surgeons are required to use a checklist telling them to do such obvious things as wash their hands before performing surgery, the mortality rates of their patients improve substantially.[1] Checklists can be very useful for ensuring that one is in fact doing all the things necessary to work safely. Without formal procedures and documentation, it is very easy to miss key safety steps. The appendix of this survey contains references to many checklists for your review. You are urged to create checklists and to use them as appropriate. Having such checklists will assist you in performing the required safety activities in a standardized, recorded way. That way, you can monitor your compliance with your own safety plan. You need to keep yourself on track with the requirements identified in your safety plan. Without proper records, it is a matter of guess work whether you are really doing the things you need to be doing. Safety is not something to guess about.

[1] http://www.thelancet.com/journals/laninf/article/PIIS1473309909700957/fulltext?rss=yes.

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Contact Information

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2. BC Hydro Health and Safety
    a. Erica Nelson, Contracts Manager/Transmission & Distribution Procurement Office Phone 604.528.2534 Email Erica.Nelson@bchydro.com
    b. Paul Mancor Office Phone 250.819.3666 Email Paul.Mancor@bchydro.com
3. WorkSafeBC (Policy)
    a. Don Schouten, Manager/Industry & Labour Services Office Phone 604.214.6989 Email don.schouten@worksafebc.com

Websites

1. LCA: www.lca.ca
2. WorkSafeBC: www.worksafebc.com/
3. Canadian Centre for Occupational Health and Safety: www.ccohs.ca/
4. BC Association for Crane Safety: http://www.bcacs.ca/
5. BC Hydro (General): http://www.bchydro.com/
6. BC Hydro (Contractor Extranet): https://www.bchydro.com/ex/bch_safety.html

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Introduction

This Survey Guide is broken down into four main parts—namely:

1) Part One, which surveys materials that are found found on the WorkSafeBC website
2) Part Two, which surveys materials that are found on the Canadian Centre for Occupational Health and Safety
3) Part Three, which surveys materials that are found on the BC Hydro website
4) Part Four, which presents a letter from the BC Association for Crane Safety intended to explain crane operator certification.

After this Survey Guide, there is an appendix containing references to the materials discussed in the four parts above. The material referenced in the appendix should be of particular value when developing a health and safety plan and deciding what should be included in it.

Part One: WorkSafeBC Documents and Resources[2]

The main WorkSafeBC document that defines your health and safety responsibilities is OHS Regulation Part 19—Electrical Safety.[3] This document, important though it is, is of rather limited value for developing a comprehensive health and safety plan for your company. To develop your company's health and safety plan, it will probably be useful to consult all of the documents and resources discussed below, and such additional materials as pertain to the needs of your particular situation.

You may wish to begin by reviewing the WorkSafeBC document entitled "Health and Safety Management"[4] prior to developing your company's Health and Safety Plan. This document breaks Health and Safety Management down into six areas:

1. Senior Management Commitment
2. Hazard Risk Identification, Assessment, and Control
3. Training and Instruction of Workers
4. Inspection Program
5. Incident Reporting and Investigation
6. Program Administration

[2] http://worksafebc.com/
[3] http://www2.worksafebc.com/publications/OHSRegulation/Part19.asp
[4] http://www.worksafebc.com/insurance/partners_program/assets/info_sheets/COR_Health_and_Safety_Management.pdf

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This approach provides one possible framework for developing a Health and Safety Program, as each of these items will need, in some way, to be dealt with in an effective Health and Safety Program. To see how BC Hydro's Safety Management System aligns with this framework, please do the following:

1. Go to https://www.bchydro.com/ex/bch_safety.html
2. Log In[5]
3. Click on Standards and Regulations
4. Click on Occupational Safety and Health [OSH] Standards
5. Click on Safety Management
6. Click on the various documents available related to Health and Safety

It is suggested that you review BC Hydro's approach to Health and Safety Management before attempting to develop an approach that is appropriate for your company. It is **NOT** suggested that you simply copy BC Hydro's approach, which almost certainly would not exactly meet your needs, since BC Hydro's needs, unlike yours, are determined the fact that it is a multi-faceted public utility with a distinctive size, corporate culture, and scope of work that are almost certain to differ substantially from yours.

Another WorkSafeBC document likely to be of value is the document entitled "How to Implement a Formal Occupational Health and Safety Program".[6] This document is much more specific than the more general WorkSafeBC document discussed above. This document identifies roles and responsibilities for all those involved in the execution of a company's health and safety program. In particular, please take due note of the various checklists contained in this document. You may find it appropriate to adapt some, or all, of these checklists to your company as a way of insuring that you company is doing the things it needs to do and is recording them as being done.

If your company is large enough, it must have a formal Joint Health and Safety Committee, per this requirement:[7]

> "The *Workers Compensation Act* requires employers to establish a Joint Health And Safety Committee in any workplace that regularly employs 20 or more workers (full and part time). The WorkSafeBC (formally known as The Worker Compensation Board of BC) may also require other workplaces to establish a health and safety committee."

The quotation above is taken from the WorkSafeBC document entitled "Joint Occupational Health & Safety Committee". You are likely to find useful information in this document for organizing your Health and Safety Committee and for identifying its mandate scope and principles of operation. If you already

[5] For log In information to access the above referenced BC Hydro website, please contact BC Hydro directly. Your current (04 March 2011) BC Hydro contacts are: Erica Nelson (604) 528-2534 and Paul Mancor (250) 819-3666.
[6] http://www.worksafebc.com/publications/high_resolution_publications/assets/pdf/bk14.pdf
[7] http://www.worksafebc.com/publications/health_and_safety/by_topic/assets/pdf/jointoch.pdf, p. 4

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have a functioning Health and Safety Committee, it is suggested that you review your company's committee structure and activities against what is specified in this document. You will want to ensure that your committee satisfies the intent of what is required by the Workers Compensation Act. Reviewing this document may help you do that.

Due diligence is a key aspect of an effective Health and Safety Program. For a useful overview of due diligence and other elements in an Effective Health and Safety Program, please review the WorkSafeBC document entitled "Effective Health and Safety Programs".[8] You are encouraged to use a "Due Diligence Checklist". WorkSafeBC provides a sample such check list[9]. You may find it useful to review the WorkSafeBC Due Diligence Checklist before developing your own.

Keeping proper records is often an issue for small companies—and indeed sometimes even for large ones. WorkSafeBC publishes a sample Health and Safety Log Book for Small Businesses,[10] which you may wish to review. This document is not specific to power line contracting businesses. It is always important to ensure that the particular risks and hazards associated with your company's work are properly dealt with in your company's specific health and safety plan. Some of these risks and hazards are identified and explained in the WorkSafeBC document entitled "Working Safely around Electricity".[11] You may wish to keep copies of this document on hand.

An important aspect of maintaining a safe working environment for the employer and supervisors is to talk to crews about safety on a regular basis. Some helpful tips on how to do this are contained in the WorkSafeBC document entitled "How to Deliver a Crew Talk".[12] You may wish to consider having your supervisors review this document as part of their training and preparation to be effective supervisors.

One aspect of supervision relates to safety inspection. The WorkSafeBC document entitled "Safety Inspections"[13] discusses how to meet the legal requirements for safety inspections:

1. Who is qualified to conduct them?
2. How often must they be done?
3. What should be done on safety inspections?

Unfortunately, the answers to these questions tend to be vague and general, such as:[14]

[8] http://www.worksafebc.com/publications/health_and_safety/by_topic/assets/pdf/ph33.pdf
[9] http://www2.worksafebc.com/PDFs/common/due_dil_checklist.pdf
[10] http://www.worksafebc.com/publications/health_and_safety/by_topic/assets/pdf/small_biz_log_book.pdf
[11] http://www.worksafebc.com/publications/health_and_safety/by_topic/assets/pdf/electricity.pdf
[12] http://www2.worksafebc.com/PDFs/small%20business/CrewTalk/crew_talk_supervisor_training.pdf
[13] http://www.worksafebc.com/publications/health_and_safety/by_topic/assets/pdf/safety_inspections.pdf
[14] http://www.worksafebc.com/publications/health_and_safety/by_topic/assets/pdf/safety_inspections.pdf, p. 5

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> "Provision for the regular inspection of premises, equipment, work methods and work practices, at appropriate intervals, to ensure that prompt action is undertaken to correct any hazardous conditions found."

Such statements may leave you wondering, "What is an *appropriate* interval for crew inspections?" Despite its vagueness, this document does contain helpful information on the questions asked above. Please consult this document, as appropriate, when developing your company's policies and practices with respect to crew inspection. Some of the sample forms contained in this document may be useful for developing a proper system of record keeping with respect to your crew inspections. It is extremely important that you take and store records for all crew inspections.

Before ending this survey of WorkSafeBC safety resources, reference should be to two more of its resources—namely, WorkSafeBC's WHMIS document,[15] since WHMIS imposes some nearly universal requirements upon businesses, and to WorkSafeBC's various statistics and other information on claims, injuries and fatalities,[16] some of this data may call for discussion in your company's safety meetings.

[15] http://www.worksafebc.com/publications/high_resolution_publications/assets/pdf/whmis_core_2up_highres.pdf

[16] http://www.worksafebc.com/about_us/facts_and_figures/default.asp

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Part Two: Canadian Centre for Occupational Health and Safety Documents and Resources[17]

We all hope never to have an incident that requires investigation. Nevertheless, should such an incident occur, it is important for you to investigate it properly. In an abundance of caution, you should be familiar with what a proper incident investigation entails even you never need to conduct one. It is highly recommended that your senior management and supervisors review the section called "Accident Investigation"[18] on the Canadian Centre for Occupational Health and Safety at least annually and before conducting an investigation should you ever need to conduct one. To review this information, go to http://www.ccohs.ca/oshanswers/hsprograms/investig.html

The Canadian Centre for Occupational Health and Safety also has useful information on "risks and hazards,"[19] and "confined space".[20]

[17] http://www.ccohs.ca/
[18] http://www.ccohs.ca/oshanswers/hsprograms/investig.html
[19] http://www.ccohs.ca/oshanswers/hsprograms/hazard_risk.html
[20] http://www.ccohs.ca/oshanswers/hsprograms/confinedspace_program.html

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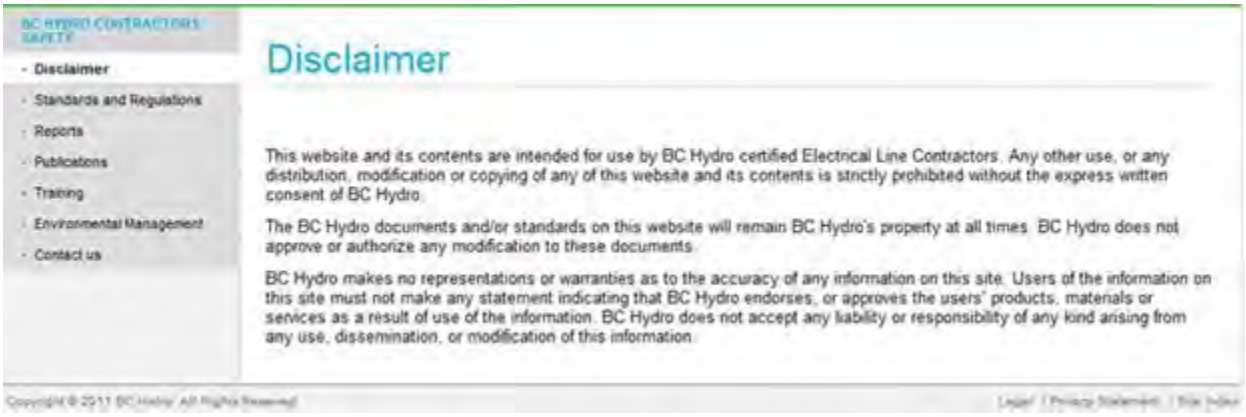
Part Three: BC Hydro Documents and Resources[21]

Your main points of contact for all health and safety issues related to BC Hydro currently (4 March 2011) are: Erica Nelson (604) 528-2534 and Paul Mancor (250) 819-3666. These are the people at Hydro to call when you need help or clarification.

Another critically important resource is BC Hydro's extranet site for line contractors. To access this website, go to https://www.bchydro.com/ex/bch_safety.html If you do not know how to log into this site, please contact Ms Nelson or Mr Mancor.

When using this website, always be mindful of BC Hydro's disclaimer, which reads:



One document on this site of particular interest is entitled "OSH Standard 122 Job".[22]

To access this document, please take the following steps:

1. Go to https://www.bchydro.com/ex/bch_safety.html
2. Log In
3. Click on "Standards and Regulations"
4. Click on "Occupational Safety and Health [OSH] Standards"
5. Click on "Safety Management"
6. Click on "OSH 122 – Job Planning

Please review this document carefully as you develop your company's approach to job planning. Please take due note of BC Hydro's own practice to conduct a fresh tailboard "when there is a change in the job to ensure that all workers understand the hazards, barriers in place, risks and procedures associated with the job."[23]

You are encouraged to make regular use of this site. Other useful information currently (4 March 2011) available on this site include:

[21] http://www.bchydro.com/
[22] https://www.bchydro.com/ex/bch_safety/fosep/fosep?guid={04BC412D-5A56-40D8-B863-CD40C643E349}
[23] https://www.bchydro.com/ex/bch_safety/fosep/fosep?guid={04BC412D-5A56-40D8-B863-CD40C643E349}, p 1.

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1. The PSSP training modules
2. The Safety Practice Regulations [SPRs]
3. Incident Reports, including an option to report an Incident, which you urged to do when appropriate
4. Resources related to Environmental Management

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Part Four: BC Association for Crane Safety[24]

The BC Association for Crane Safety (http://www.bcacs.ca/) is where you should go for definitive answers to your questions related to crane safety and crane operator certification. However, on the question whether your workers do or not require crane certification to operate your vehicles, you may find this letter from the BC Association for Crane Safety helpful:

Friday, January 28, 2011

Jeff Skosnik
Line Contractors Association
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Re: Clarification on Crane Operator Certification and Appropriate Crane Types

Dear Jeff,
It has come to my attention that there exists some level of confusion within your industry sector with regards to the correct crane type that qualifies for certification with the BC Association for Crane Safety (BCACS).

This came to my attention as the result of a request for clarification from a Line Contractors Association member company on January 12th, 2011. This company requested clarification on the crane type that was being utilized for their scheduled practical assessments. It is important that the appropriate crane type is selected and used for the practical assessment and that the correct credential is then issued following successful completion.

Please circulate this letter and following explanation to your membership for clarification on this issue.

The following information is important for clarification:

Correct Crane Type
A "Digger Derrick" is not a crane type defined by BCACS. We do not assess this type of equipment. We do not have a qualification for this equipment type.

[24] http://www.bcacs.ca/

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In the company member example, a Terex 18 ton Commander C6060 was the equipment type selected and in question. This equipment is defined as a "Digger Derrick" and therefore not a crane type that BCACS would assess and therefore BCACS would not issue a credential.

Correct Level

Now that we have clarified the crane type, we can define the correct "Level" as the next point for clarification.

We are now discussing the correct "Level" that would be applied for Boom Truck and Mobile Crane that may be in use in your industry sector.

The confusion that exists here is whether the "Level D" or the "Level A" is the appropriate credential to acquire.

The "Level A" is the appropriate credential for use, given the mobility of your workforce and the types of cranes used in your industry. This is the full scope credential, where the operator has all of the defined skill, knowledge and ability to operate the appropriate crane. This means that the operator can safely operate and has the recognized ability to safely and appropriately manage all situations that the crane is capable of lifting on any given day. We define this as "Full Scope". This is the "Level A".

If your crane operator is not functioning at this level or is not expected to operate with this complete set of skills, then the "Level D" can be considered. We define the "Level D" as "Not Full Scope". Please be aware that if you are considering the "Level D" credential for your workforce, that you have met all of the requirements for this credential, not only a few.

If further detail or explanation is required, I suggest that you go to our website, www.bcacs.ca or contact BCACS directly at 604-525-1227.

It is also important to be reminded that the February 28th, 2011 deadline is approaching quickly. All operators of the crane types that we service must possess a credential to operate by this date. Otherwise the operator is not compliant with the WorkSafeBC regulation and will not be in a position to legally operate.

Hopefully this information will clarify these issues that have emerged. Thank you for taking the initiative and providing this information for your membership at this time.

Respectfully,

Fraser Cocks
Executive Director

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Appendix: References to the Supporting Documents

Part One: WorkSafeBC Documents[25]

1. "Health and Safety Management"[26]
2. "How to Implement a Formal Occupational Health and Safety Program"[27]
3. "Effective Health and Safety Programs"[28]
4. Joint Occupational Health & Safety Committee"[29]
5. "Due Diligence Checklist"[30]
6. "Small Business Log Book"[31]
7. "Working Safely Around Electricity"[32]
8. "How to Deliver a Crew Talk"[33]
9. "Safety Inspections"[34]
10. "WHMIS"[35]
11. "Facts and Figures"[36]

Part Two: Canadian Centre for Occupational Health and Safety

1. "Incident Investigation"[37]
2. "Confined Space"[38]
3. "Risks and Hazards"[39]

[25] Date these URL references were verified: 02 March 2011
[26] http://www.worksafebc.com/insurance/partners_program/assets/info_sheets/COR_Health_and_Safety_Management.pdf
[27] http://www.worksafebc.com/publications/high_resolution_publications/assets/pdf/bk14.pdf
[28] http://www.worksafebc.com/publications/health_and_safety/by_topic/assets/pdf/ph33.pdf
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[33] http://www2.worksafebc.com/PDFs/small%20business/CrewTalk/crew_talk_supervisor_training.pdf
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[38] http://www.ccohs.ca/oshanswers/hsprograms/confinedspace_program.html
[39] http://www.ccohs.ca/oshanswers/hsprograms/hazard_risk.html