



Dolyn Construction Ltd.

Occupational Health & Safety Program

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OHS Policy Statement

At Dolyn Construction Ltd., we acknowledge and uphold the right of every worker to work in a safe and healthy work environment. We are dedicated to maintaining such an environment and to carrying out our business activities in ways that protect both human health and the environment. We will:

Comply with all applicable OHS laws, regulations, and standards. We will also adhere to internal policies and procedures that often exceed regulatory requirements.

Strive to prevent work-related injuries, illnesses, and incidents through proactive identification, assessment, and management of risks and hazards in the workplace.

Continuously improve our OHS performance by setting measurable objectives and targets, monitoring progress, and implementing necessary corrective actions.

Provide ongoing education and training to ensure that all employees understand their roles and responsibilities related to OHS and are competent to perform their duties safely.

Foster a culture of safety by encouraging open communication, consultation, and participation among all employees and stakeholders. We value their input and will involve them in OHS decision-making processes.

Allocate appropriate resources, including personnel, time, and financial support, to implement and maintain our OHS management system effectively.

Implement and maintain a comprehensive OHS Program that defines the responsibilities of all workplace parties, including management, supervisors, employees, and subcontractors. This program will provide the necessary tools, resources, and guidance to fulfill these responsibilities effectively.

Develop, implement, and maintain emergency preparedness and response plans to minimize the impact of potential emergencies.

Every employee, contractor, and visitor has a personal responsibility to work safely, adhere to the OHS policies and procedures, report hazards, and contribute to a safe and healthy workplace.

This OHS Policy Statement will be reviewed regularly, but at least annually to ensure its ongoing suitability and effectiveness, and it will be updated as necessary to reflect changes in our operations or applicable legislation.

We will ensure that this OHS Policy Statement is communicated to all employees, contractors, and stakeholders. We will also ensure that they understand the policy and its implications.

Doug Burnside
President
Dolyn Construction Ltd.
January 2, 2025



Environmental Policy Statement

Dolyn Construction Ltd. is committed to protecting the environment and minimizing our ecological footprint. We recognize the importance of sustainable practices and their impact on the well-being of our planet and future generations. As such, we pledge to integrate environmental considerations into all aspects of our operations and decision-making processes.

Our environmental policy encompasses the following principles:

We will comply with all applicable environmental laws, regulations, and standards. We will continuously monitor changes in environmental legislation and strive to exceed compliance requirements whenever possible.

We will strive to conserve natural resources by reducing waste, minimizing energy consumption, and promoting efficiency throughout our operations. We will implement initiatives to optimize resource use and reduce our carbon emissions.

We will take proactive measures to prevent pollution, including the reduction of emissions, proper waste management, and the use of environmentally friendly technologies and materials. We will seek to minimize the environmental impact of our activities at every stage of the product lifecycle.

We will educate our employees, suppliers, and stakeholders about the importance of environmental stewardship and provide training on best practices for environmental management.

We will establish measurable environmental objectives and targets to track our progress toward sustainability goals. We will regularly review our performance, identify areas for improvement, and implement initiatives to enhance our environmental performance.

We will collaborate with government agencies, non-governmental organizations, industry partners, and other stakeholders to address environmental challenges and promote collective action towards a more sustainable future.

By adhering to these principles, Dolyn Construction Ltd. is committed to being a responsible steward of the environment, contributing to the preservation of natural resources, and fostering a healthier planet for current and future generations.

Doug Burnside
President
Dolyn Construction Ltd.
January 2, 2025

Leadership and Accountability Policy and Procedure

Objective

The objective of the Dolyn Construction Ltd. Leadership and Accountability Policy and Procedure is to define the roles, responsibilities, and expectations of leaders in fostering a culture of OHS within the organization. It serves as a foundational framework integrated within the OHSMS, ensuring that leadership commitment and accountability are effectively incorporated into OHS practices and procedures.

Policy Statement

Senior Management acknowledges that commitment, leadership, and effective participation are vital for the success of our OHSMS. Therefore, we are dedicated to cultivating effective leadership across all organizational levels to realize our goals and objectives. This Leadership and Accountability Policy outlines our expectations for leaders and the procedures for their selection, development, and evaluation.

Risk Assessment

Failing to have an OHS Leadership and Accountability Policy can lead to increased workplace accidents, legal non-compliance, lowered employee morale, and reputational damage due to a lack of clear commitment to safety from leadership. The organization has assessed this risk as a "B" hazard.

Responsibilities

Senior Management will:

- Ensure the implementation of the OHS Management Lifecycle process, as outlined in our OHS Management Lifecycle document (LEA D5) when developing this policy, procedures, and processes to ensure all necessary considerations are addressed.
- Actively promote an unwavering commitment to OHS, reflected in the annual development of a comprehensive OHS Policy Statement (LEA D2), detailed plans with objectives, strategies, and action plans derived from OHSMS or policy reviews.
- At least annually, set objectives to create a safer work environment, prevent accidents and injuries, and promote the well-being of employees and communicate them to employees. (LEA D4).
- Assume ultimate responsibility for the organization's OHS performance and compliance, establishing a structured chain of accountability with defined roles and responsibilities within the OHSMS.
- Provide essential resources for the establishment, implementation, maintenance, and enhancement of the OHSMS, considering personnel, training, equipment, technology, time, external expertise, documentation, continuous improvement initiatives, and other necessary action, maintenance, and improvement of the OHSMS.
- Promote and support effective processes for hazard identification, risk control, participation of workplace parties, and continual improvement of the OHSMS. This will be achieved by:
 - Establishing clear policies and procedures
 - Providing training and education
 - Encouraging worker participation
 - Allocating adequate resources
 - Leading by example
 - Implementing feedback mechanisms
 - Monitoring and reviewing performance
 - Celebrating successes and learning from failures
 - Striving for continual improvement
 - Ensuring open channels of communication
- Promote and support the participation of workplace parties at all levels and functions by fostering a culture of open communication, employee engagement, and continuous improvement in OHS through regular feedback mechanisms, safety committees, safety teams, training, and recognition initiatives.

- Promote and support the continual improvement of the OHSMS overall by utilizing a comprehensive approach involving regular audits, incident analysis, and continuous training to identify improvement opportunities, assess effectiveness, and ensure compliance with health and safety standards.

Senior Management will demonstrate leadership and commitment with respect to the OHSMS by:

- Taking responsibility and accountability for the protection of workers' OHS in the workplace. This involves conducting an annual review of the Policy Statement to reaffirm commitment, establish comprehensive Health and Safety (H&S) Program, and efficiently communicate this commitment through safety meetings and orientations, all aimed at ensuring the well-being of workers.
- Overseeing its effective implementation and ongoing continual improvement through annual OHS audits, setting organizational goals based on audit findings, and developing action plans to achieve these objectives.
- Creating a Health and Safety Organizational Chart (LEA D3) to identify roles within the organization and defining roles, assigning responsibilities, delineating authorities, and accountabilities for the effective implementation and continual improvement, designating an individual to oversee all aspects of OHS and OHSMS, acknowledging the involvement of worker representatives in the process and ensuring communication with relevant parties. Refer to the Roles and Responsibility Report (LEA D5).
- Ensuring consultation and participation of workers and their representatives in establishing and maintaining various aspects of the OHS program and OHSMS, ensuring selection selecting representatives as required, establishing Joint Health and Safety Committees (JHSCs) when necessary, and involving worker representatives in policy and procedure reviews, among other measures.
- Ensuring that objectives are achievable, measurable, and met. This involves reviewing and endorsing the organization's OHS Policy Statement and Program, establishing goals and objectives based on review findings, tracking progress, and communicating updates to employees through safety meetings.
- Regularly assessing its effectiveness through audits and developing action plans accordingly, including conducting Senior Management review meetings or similar activities.

Management and Supervisors will:

- Implement OHS policies and procedures established by senior management.
- Ensure employees receive training/instruction on safe work practices, procedures, and the use of PPE.
- Identify hazards within their areas of responsibility and take measures to eliminate or control them.
- Implement controls to mitigate risks.
- Ensure that all work activities comply with OHS laws, regulations, and organizational policies.
- Ensure workplace incidents, injuries, near misses, and hazards are promptly reported and investigated.
- Communicate safety information including updates on OHS policies, procedures, and safety hazards.

H&S Coordinator will:

- Complete a H&S Coordinator Agreement (LEA F1) at least annually.
- Arrange for OHS training to ensure employees are aware of safety procedures, hazards, and controls.
- Assist in conducting risk assessments to identify workplace hazards and assess associated risks.
- Monitor compliance with OHS laws, regulations, and organizational policies.
- Oversee the incident reporting and investigation process.
- Maintain accurate and up-to-date records related to OHS activities.
- Provide support and guidance to managers, supervisors, and employees on OHS matters.
- Promote a positive safety culture within the organization.
- Support continuous improvement efforts to enhance the effectiveness of the OHSMS.

Employees will:

- Comply with OHS policies, procedures, and safety measures established by the organization.
- Report all accidents/illnesses or near misses to the supervisors immediately.
- Participate in OHS training and safety talks required by the organization.
- Use provided safety equipment, such as PPE, safety harnesses, or respiratory protection, as instructed.
- Be familiar with emergency procedures, such as evacuation routes, assembly points, and contact information.

Worker Representatives will:

- Serve as the voice of workers in matters related to OHS.
- Identify hazards and assess associated risks.
- Promote a culture of OHS within the organization.

H&S Consultant will:

- Assist management in the development and implementation of this policy and procedure.
- Provide, as requested, information dealing with OHS issues.
- Provide recommendations to management regarding this policy.

Subcontractors will:

- Comply with all relevant OHS laws, regulations, and standards, as well as organizational OHSMS policies and procedures.
- Report all accidents/illnesses or near misses to the supervisor immediately.
- Conduct risk assessments for their work activities and identify hazards that could pose a risk to OHS.
- Ensure their employees receive OHS training relevant to their job duties and work environment.
- Communicate with the organization's management about potential hazards, safety procedures, and any other relevant OHS information.

Visitors will:

- Complete a Visitors Agreement (LEA F2) prior to entering a worksite.
- Wear all Personal Protective Equipment (PPE) required by the organization.
- Be accompanied by a Dolyn Construction Ltd. employee at all times.
- Remain with the host for the duration of the visit.
- Obey all posted signage.
- Report to their host, any injury sustained on the visit regardless of how minor.

Hosts will:

- Inform the visitor(s) of any general hazards associated with the worksite being visited, and explain the OHS behaviours necessary to control these hazards.
- Inform visitor(s) of any site-specific hazards and explain the health and safety behaviours necessary to control these hazards.
- Instruct visitor(s) on site emergency plans.
- Provide the visitor(s) with PPE required on the site.
- Remain with visitor(s) at all times.
- Do everything reasonable to provide for the safety of the visitor(s).

Procedures

OHS Management Lifecycle:

- The OHS Management Lifecycle is a structured process guiding our organizations through various phases of Occupational Health and Safety (OHS) management.
- It involves adhering to our OHS Management Lifecycle document (LEA D5) to ensure comprehensive consideration in policy, procedure, and process development.
- This lifecycle spans from initial planning to continuous improvement, offering a framework for effective OHS risk management, regulatory compliance, and safety culture promotion.

Document Control

- The following Documents and records are required for this policy and procedure, for audit purposes and for planning, implementation, control, evaluation and overall management of the OHSMS. Documents and records are maintained, reviewed, electronically filed and stored in personnel files, or with the applicable project files. Documents and records are retained for a minimum of five years.

Supporting Documents

Leadership and Accountability Policy and Procedure

Health and Safety Organizational Chart

Roles and Responsibility Report

OHS Management Lifecycle

Health and Safety Coordinator Agreement

Visitor Agreement

Worker Participation Policy and Procedure

Objective

Senior Management's objective is to actively involve employees in the identification, assessment, and management of OHS risks within the organization. This involvement should lead to increased awareness, better compliance with safety procedures, and ultimately a safer work environment for all employees.

Policy Statement

Senior Management recognizes that commitment, leadership, effective participation and collaboration with management, are crucial to the success of an OHSMS. Senior Management is committed to ensuring worker participation in the planning, implementation, and evaluation of our OHSMS. Through active involvement, we aim to create a safe and healthy work environment, and continuously improve our OHS performance.

Definitions

Internal Responsibility System (IRS)

The IRS highlights shared responsibility for OHS among all levels of the organization. It mandates individuals to identify hazards, promote safe practices, and enhance the work environment. Through collaboration and active involvement, the IRS ensures a safe workplace for everyone.

Joint Health and Safety Committee (JHSC)

A forum for bringing the internal responsibility system into practice. The committee consists of labour and management representatives who meet regularly to deal with OHS issues.

Risk Assessment

Failing to have a worker participation policy can result in disengaged employees, leading to reduced morale, productivity, and innovation, while also hindering the organization's ability to identify and address workplace hazards and improve overall safety measures. The organization has assessed this risk as a "B" hazard.

Responsibilities

Senior Management will:

- Ensure the implementation of the OHS Management Lifecycle process, as outlined in our OHS Management Lifecycle document (LEA D5) when developing this policy, procedures, and processes to ensure all necessary considerations are addressed.
- Provide mechanisms, time, and resources necessary for workers or their representatives to participate effectively in OHS activities.
- Ensure timely access to relevant information related to OHS for workers or their representatives.
- Identify and remove barriers that hinder worker participation in the OHSMS.
- Encourage and support worker participation in all aspects of OHS within the workplace.

Workers will:

- Actively participate in OHS activities, including hazard identification, risk assessments, incident investigations, and development/review of OHS policies, procedures, processes, and objectives.
- Provide feedback, suggestions, and concerns regarding OHS matters to management.
- Cooperate with management and fellow workers to maintain a safe and healthy work environment.
- Elect or appoint worker representatives to communicate and represent worker interests in OHS matters.

Worker Representatives will:

- Serve as a liaison between workers and management regarding OHS issues.
- Represent the interests and concerns of workers during consultations and decision-making processes.
- Facilitate communication and collaboration among workers and management to address OHS challenges.
- Participate in training and awareness programs to enhance their understanding of OHS management.
- Utilize provided mechanisms to access relevant information and participate in decision-making processes related to OHS.

Procedures

Worker Participation:

- Senior management will ensure worker participation in the planning, implementation and evaluation of all aspects of the OHSMS. This will be achieved by ensuring the selection of Health and Safety (H&S) representatives as necessary and establishing Joint Health and Safety Committees (JHSC) as mandated, ensuring their compliance with the requirements outlined in sections 8 and 9 of the Occupational Health and Safety Act (OHSA).
- JHSCs will consist of both worker and management representatives. Within the JHSC, workers will engage in hazard identification, risk assessment, incident review, policy development, and safety practice improvement, and the overall improvement of the organization's OHSMS. Names and cell numbers of H&S representatives or JHSC committee members will be documented and posted using the Right to Participate Poster (WP D3).
- Senior management will ensure H&S representatives are selected as required and that Joint Health and Safety Committees (JHSC) are established as required. JHSCs will consist of both worker and management representatives. Within the JHSC, workers will engage in hazard identification, risk assessment, incident review, policy development, and safety practice improvement, and the overall improvement of the organization's OHSMS. Names and cell numbers of H&S representatives or JHSC committee members will be documented and posted using the Right to Participate Poster (WP D3).
- Senior Management will schedule regular OHS meetings, at least annually, to provide a forum for workers to voice their concerns, share best practices, and receive updates on OHS policies and procedures. Management will monitor the attendance and engagement levels in these meetings, to include actionable items generated from the discussions.
- Management will engage workers in risk assessment and hazard control processes, benefitting from their firsthand experience of tasks and encountered hazards. Workers can contribute through walk-through inspections, participation in hazard identification workshops, and reviewing risk assessment reports.
- To enable employees to participate anonymously, Dolyn Construction Ltd. may utilize suggestion boxes or from time to time will conduct worker surveys.

Allocation of Time and Resources

- Senior Management will allocate the required time and resources for workers or their representatives to actively participate in all aspects of the OHSMS. This may involve scheduling regular meetings, offering training sessions, and earmarking budgetary resources for OHS initiatives.

Access to Information

- Access information related to the Occupational Health and Safety Management System (OHSMS) such as OHS policies, procedures, risk assessments, Safety Data Sheets (SDS), workplace inspections, incident reports, and OHS performance data, will be presented in a format that is comprehensible to workers.

Encouragement and Support

- Management will encourage and support worker participation by identifying and removing barriers to participation such as by cultivating an atmosphere of transparent communication, offering incentives to encourage involvement, scheduling meetings during standard work hours, and promptly addressing any concerns raised by workers. Refer to the Worker Participation Plan (WP D2).

Participation in OHS Activities

- Workers or their representatives will be informed, consulted, and allowed to participate in all aspects of OHS within all Dolyn Construction Ltd. workplaces.
- This will include hazard identification, risk assessments, incident investigations, development/review of OHS policies, procedures, processes, and objectives, consultation on changes affecting OHS, representation on OHS matters, performance of workplace inspections, and access to relevant reports.

Hazard Identification and Risk Management

- Workers will be encouraged to report any hazards, near misses, or unsafe conditions to their supervisor, or designated OHS representative, promptly.
- Supervisors, worker representatives and management will investigate reported hazards and take appropriate action to address them promptly.
- Regular workplace inspections will be conducted to identify potential hazards, with workers encouraged to actively participate in these inspections.

Incident Investigation

- Workers and their representatives, will be included in incident investigations from the initial stages. They will be informed when an incident occurs, and invited to provide input during the investigation process.

OHS Development and Review

- Workers and representatives from different levels of the organization, will be included in development and reviews to ensure a wide range of perspectives and experiences are considered.
- Senior Management will establish multiple channels for workers to provide input during the review process such as surveys, suggestion boxes, or interviews.

Change Management

- Senior Management will seek input from workers regarding proposed changes to OHS policies, procedures, or processes, urging them to express their viewpoints, concerns, and ideas for enhancement via surveys or meetings.
- Worker concerns will be heard and resolved, with clear explanations provided regarding how the proposed changes will enhance workplace safety and tackle any risks or challenges raised by workers.

Representation in OHS and OHSMS Issues

- Workers or their representatives will be included in discussions, decision-making processes, and actions related to OHS, ensuring representation on any other OHS matters as necessary.

Access to Relevant Information

- The H&S Coordinator will ensure that workers and their representatives have access to necessary documents, reports, records, or any other pertinent information. However, in certain instances, access to specific information may be restricted due to considerations of privacy and confidentiality policies.

Workplace Inspections

- Inspectors will encourage participation from workers during inspections by asking questions, seeking their observations, and involving them in hazard identification and risk assessment processes.
- Provide feedback on inspection results and the steps taken to mitigate identified hazards. Acknowledge worker involvement in enhancing workplace safety by participating in inspections.

OHS Meetings and Committees

- Regular OHS meetings will be conducted to discuss safety issues, review incident reports, and develop strategies for improving workplace safety.
- Workers will elect representatives to serve on an OHS committee, where they can participate in decision-making processes related to OHS matters.
- Minutes of OHS meetings will be documented and made available to all workers.

Training and Education

- Workers will receive training on workplace hazards, safe work practices, and emergency procedures.
- Management will allocate time and resources for workers to participate in OHS training programs ensuring that they have the knowledge and skills necessary to contribute to a safe work environment.

Communication and Feedback

- Dolyn Construction Ltd. will establish open channels of communication for workers to raise OHS concerns, provide feedback, and make suggestions for improvement.
- Workers will be encouraged to engage in discussions regarding OHS policies, procedures, and initiatives, with their input valued and considered in decision-making processes.

Documentation

- Records of OHS meetings, training sessions, hazard reports, and other relevant documents will be maintained in accordance with the organization's policies and regulatory requirements.
- A JHSC agenda (WP F2) will be prepared and will contain the minutes of the previous meeting for approval and other items pertaining to OHS in the workplace.
- The JHSC will maintain and keep dated minutes (WP F3) as a record of its proceedings. The minutes will be posted at a pre-determined location determined by the Committee.
- Recommendations to Senior Management will be recorded using the Recommendations form (WP F4) and Senior Management will respond, using the provided section of the form, within 21 days.

Committee Requirements

- Required at all workplaces that regularly employ twenty or more workers, or as directed by the MLITSD, or where designated substances regulations apply.
- The committee will consist of representatives from both management and workers, with equal representation from both parties.
- The JHSC will consist of two members on projects employing twenty or more workers or four members on projects regularly employing fifty on projects with an expected duration of at least three months.
- On projects where the committee is required to be composed of four members, one member representing management and one member representing the workers must be certified.
- Worker members will be selected by the workers.
- The JHSC will meet at least once every three months or more frequently as scheduled by the Committee.

Compensation

JHSC members will be compensated, at the worker's regular rate of pay, for one hour to prepare for each JHSC meeting and/or to conduct other committee-related activities.

Training

Management will ensure workers are provided with OHS training and education to increase their awareness of safety issues and empower them to take an active role in identifying hazards and implementing safety measures.

Reporting

Management will encourage reporting and will follow up promptly on all reports. Workers are often best positioned to identify safety and health concerns and program shortcomings, such as emerging workplace hazards, unsafe conditions, close calls/near misses, and actual incidents.

Remove Barriers to Participation

- Management will ensure that worker participation is not hindered by overlooking language, education, or skill levels, or by fear of retaliation or discrimination for speaking up. This includes avoiding investigations that focus solely on individual blame rather than addressing underlying conditions, and ensuring that reporting incidents or concerns does not endanger the possibility of receiving incentive-based prizes, rewards, or promotions. Refer to the Worker Participation Plan (WP D2).
- Workers will be informed of their rights and responsibilities related to OHS, and provided with training and education on OHS requirements and the benefits of worker participation, this will be achieved through safety talks, training, and/or orientation processes.
- Dolyn Construction Ltd. will provide frequent and regular feedback to show employees that their safety and health concerns are being heard and addressed.
- Workers will be protected from retaliation for reporting injuries, illnesses, and hazards or for exercising their OHS rights.
- Policies and programs will be developed in a manner that encourages worker participation.

Document Control

- The following documents and records are required for this policy and procedure, for audit purposes and for planning, implementation, control, evaluation and overall management of the OHSMS. Documents and records are maintained, reviewed, electronically filed and stored in personnel files, or with the applicable project files. Documents and records are retained for a minimum of five years.

Supporting Documents

Worker Participation Procedure
Worker Participation Plan
Right to Participate Poster
H&S Representative Agreement
JHSC Meeting Agenda
JHSC Meeting Minutes
Recommendation Form

OHS Program Policy and Procedure

Objective

The objective of this policy is to outline the framework for the development, implementation, and continuous improvement of our organization's OHS program with the aim of ensuring the OHS of employees, contractors, visitors, and other stakeholders while they are on company premises or engaged in company activities.

Policy Statement

Our organization is committed to ensuring the OHS of all employees and stakeholders. Through continuous improvement and compliance with applicable regulations, we strive to create a workplace that prioritizes accident prevention and promotes the well-being of all individuals involved.

Scope

This policy encompasses all aspects of OHS, including but not limited to hazard identification, risk assessment, training, emergency preparedness, and compliance with relevant regulations and will apply to all employees, contractors, visitors, and other individuals engaged in activities under the control of our organization.

Risk Assessment

Failing to have an OHS program can lead to increased workplace accidents, injuries, and illnesses, as well as legal liabilities, financial losses, and reputational damage for Dolyn Construction Ltd. due to non-compliance with safety regulations and standards. The organization has assessed this risk as an "A" hazard.

Responsibilities

Senior Management will:

- Ensure the implementation of the OHS Management Lifecycle process, as outlined in our OHS Management Lifecycle document (LEA D5) when developing this policy, procedures, and processes to ensure all necessary considerations are addressed.
- Establish OHS policies, objectives, and targets.
- Ensure the development of an OHS Policy Statement that confirms commitment to preventing injury and occupational illness; adhering to applicable OHS legal and other requirements endorsed by the company; fostering consultation and participation with workers, worker representatives, and other relevant workplace parties; and consistently enhancing the OHSMS and overall OHS performance.
- Establish, implement, monitor and maintain an OHS Program that provides a framework for establishing and revising OHS objectives, is documented, implemented, and upheld, is communicated and easily accessible to affected parties, undergoes review as frequently as required, but at least annually, and receives annual approval from Senior Management.
- Allocate resources (financial, personnel, time) to support OHS initiatives.
- Ensure compliance with legal and regulatory requirements.
- Ensures the review and approval of OHS plans, reports, and performance indicators.

Health and Safety Coordinator will:

- Ensure risk assessments are conducted as required for identified hazards in the workplace.
- Arrange for the delivery of OHS training and education to employees.
- Ensure accidents, incidents, and near misses are investigated and that corrective actions are taken.
- Ensure OHS performance is monitored through inspections, reviews, and reports.
- Advise management on OHS matters and recommend improvements.

Management and Supervisors will:

- Implement OHS policies and procedures within their areas of responsibility.
- Provide leadership and guidance on OHS matters to workers.
- Conduct regular inspections of the workplace to identify hazards.
- Ensure employees receive appropriate OHS training and instruction.
- Enforce OHS rules and practices.
- Investigate accidents, incidents, and near misses.
- Take prompt action to address OHS concerns raised.
- Lead by example, promote a culture of safety and ensure compliance with policies and procedures.

Employees will:

- Comply with OHS policies and procedures.
- Participate in OHS training programs and initiatives.
- Report hazards, incidents, and near misses or unsafe conditions promptly to the supervisors.
- Use personal protective equipment (PPE) as required.
- Contribute ideas and suggestions for improving OHS in the workplace.
- Cooperating with OHS investigations and reviews.
- Take responsibility for their safety and the safety of others.

Worker Representatives will:

- Participate in the development and review of OHS policies and procedures.
- Represent the interests of Dolyn Construction Ltd. employees
- Review and analyze OHS performance data.
- Identify areas for improvement and make recommendations to management.
- Promote OHS awareness and initiatives among employees.
- Assist with the implementation of OHS programs and initiatives.
- Serve as a forum for discussing OHS issues and concerns.

Procedures

OHS Policy Statement:

An OHS Policy Statement (PROG D2) will be developed and will outline the organization's commitment to ensuring a safe and healthy work environment for its employees. It will serve as a foundational document, setting the tone and direction for the organization's OHS management system. All other policies and procedures will align with the OHS Policy Statement.

Initiation

- Identify concepts that need to be addressed in the OHS Policy Statement as a result of reviews.
- Assign responsibility for developing the OHS Policy Statement to an individual or team, typically led by senior management or the OHS coordinator.

Research and Analysis

- Research relevant laws, regulations, and standards applicable to the organization.
- Ensure the OHS Policy Statement aligns with organizational objectives and applicable legislation.

Stakeholder Engagement

- Engage key stakeholders, such as management, supervisors, employees, and worker representatives on the content, tone, and priorities of the OHS Policy Statement to ensure buy-in and inclusivity.

Drafting

- Begin drafting the Dolyn Construction Ltd. OHS Policy Statement, incorporating elements such as commitment to OHS, legal compliance, responsibilities, hazard identification, training, communication, and continuous improvement.
- Ensure clarity, brevity, and relevance of the statement, avoiding jargon and technical language that may be difficult for stakeholders to understand.

Review and Approval

- Circulate the draft OHS Policy Statement for review by relevant stakeholders, including Senior Management, legal advisors, and OHS experts.
- Incorporate feedback and revisions as necessary to address concerns and improve the clarity and effectiveness of the statement.
- Obtain final approval from senior management or the organization's leadership team.

Communication and Implementation

- Communicate the OHS Policy Statement to all employees, contractors, visitors, and stakeholders through appropriate channels, such as meetings, emails, intranet postings, or employee handbooks.
- Ensure that all individuals understand their roles and responsibilities in implementing the OHS Policy Statement and promoting a culture of safety.
- Integrate the OHS Policy Statement into the organization's OHS management system and related procedures, ensuring alignment with other OHS documents and initiatives.

Monitoring and Review

- Establish processes for monitoring and evaluating the effectiveness of the OHS Policy Statement in achieving its objectives.
- Conduct periodic reviews of the statement, typically as part of the overall OHS management system review process, to assess relevance, adequacy, and compliance with evolving legal and organizational requirements.
- Make updates and revisions to the OHS Policy Statement as needed to reflect changes in the organization's operations, objectives, or external factors impacting OHS.

OHS Program Development

Creating policies, procedures, and processes for an OHS Program is crucial for systematically recognizing, evaluating, and managing risks, thus fostering a safer workplace for everyone involved. By following the steps listed below, the organization can establish an OHS Program that effectively identifies and mitigates risks, promotes a culture of safety, and protects the well-being of employees and stakeholders.

Fundamental Components

- Identify the fundamental components to be incorporated, both collectively and individually.
- These elements should establish clear expectations, standardize practices, and promote consistency in addressing Dolyn Construction Ltd.'s OHS concerns, ultimately reducing the likelihood of accidents, injuries, and occupational illnesses.
- Ensure the implementation of the OHS Management Lifecycle process, when formulating OHS policies and procedures.

OHS Assessment

- After identifying the fundamental components of the OHS Program, the next step is to conduct a comprehensive assessment of the current state of OHS within the organization.
- This involves evaluating existing hazards, risks, and areas for improvement through workplace inspections, incident reports, and employee feedback.
- This baseline assessment will provide valuable insights to inform the development of specific policies, procedures, and initiatives tailored to address identified risks and enhance overall OHS.

Set objectives

- Following the comprehensive assessment of the current OHS status within the organization, the next step is to set clear objectives and goals for the OHS Program.
- These objectives should be specific, measurable, achievable, relevant, and time-bound (SMART). They should align with the organization's overall objectives and vision while addressing the identified hazards, risks, and areas for improvement.
- Establishing clear objectives and goals provides a roadmap for the development and implementation of effective policies, procedures, and initiatives aimed at enhancing OHS.

Allocate Resources

- Determine the resources needed to support the implementation of the OHS Program, including financial, human, and material resources.
- Allocate budget, personnel, and equipment necessary to effectively address OHS concerns and achieve the established objectives and goals.

Provide Training and Education

- Offer training to educate employees on the newly developed policies, procedures, and initiatives.
- Provide specialized training for employees working in high-risk areas or handling hazardous materials.
- Ensure all employees understand their roles and responsibilities for a safe and healthy work environment.

Establish Communication Channels

- Implement clear communication channels for reporting hazards, incidents, and safety concerns.
- Encourage open dialogue between management and employees regarding OHS.
- Ensure that employees feel comfortable raising concerns and providing feedback.

Implement Controls and Measures

- Develop and implement control measures following the Hierarchy of Controls as outlined in the organization's Hazard Management Policy and Procedure (HM D1).
- Monitor and enforce compliance with safety procedures.
- Review and update controls based on changes in the work environment or newly identified hazards.

Conduct Regular Inspections and Reviews

- Schedule routine workplace inspections to identify new hazards or areas of non-compliance.
- Perform periodic reviews of the OHS Program to assess effectiveness and to identify opportunities for improvement.
- Involve employees in the inspection and review processes to gather valuable insights and promote ownership of safety initiatives.

Respond to Incidents and Near Misses

- Reported incidents/near misses will be responded to promptly determined by a risk assessment.
- Actions will be taken to eliminate reported hazards or to prevent injury due to potential hazards.
- Investigations will be conducted to determine root causes and corrective actions to prevent recurrence.

Review and Continuous Improvement

- Regularly review the OHS Program's performance against established objectives and goals.
- Seek feedback from employees and stakeholders to identify areas for improvement and implement necessary changes.
- Stay updated on emerging best practices, industry trends, and regulatory requirements to continuously enhance the effectiveness of the program.

Document and Maintain Records

- Maintain thorough documentation of all OHS activities, including policies, procedures, training records, incident reports, and reviews.
- Keep records up-to-date and accessible for regulatory compliance and internal review purposes.
- Ensure that documentation is organized, easily retrievable, and securely stored.

Senior Management Approval

- Senior Management is ultimately responsible for the Dolyn Construction Ltd. OHS Program to ensure alignment with organizational goals, and objectives.
- Senior Management will provide feedback and recommendations for potential enhancements or adjustments to the OHS Program before granting final approval.
- Final drafts will be approved by Senior Management. They will sign off on and date final documents.
- Annually, Senior Management will conduct a comprehensive review of the OHS Program to verify its compliance with relevant Occupational Health and Safety (OHS) regulations and other requirements, while ensuring alignment with the organization's goals. This review will culminate in senior management's endorsement, signified by approval and signature.

Monitor Legal and Regulatory Compliance

- Stay informed about relevant OHS laws, regulations, and industry standards.
- Ensure that the OHS Program remains in compliance with all applicable legal requirements.
- Regularly review and update policies and procedures to reflect any changes in regulations.

Celebrate Achievements and Successes

- Recognize and celebrate achievements in OHS performance.
- Reward individuals for their contributions to maintaining a safe and healthy work environment.
- Use positive reinforcement to encourage continued commitment to safety excellence.

Engage Stakeholders

- Seek input and feedback from stakeholders to improve the effectiveness of the OHS Program.
- Involve stakeholders in decision-making processes related to OHS initiatives.

Evaluate Program Effectiveness

- Regularly assess program performance against established goals and objectives.
- Use data-driven insights to identify areas for improvement and make informed decisions to enhance program effectiveness.

OHS Worker Manual

- Develop a Worker OHS Manual (PROG D4), to address relevant workplace hazards and risks with guidelines and procedures to eliminate or minimize the hazards. Distribute the manual as part of the New Worker Orientation process. Revised copies will be distributed to workers as necessary.

OHS Controls Manual

- Develop a Controls Manual (PROG D5), to house specific hazard management and strategies. Ensure the manual is available on worksites electronically or in the on-site health and safety binder.

Document Control

- The following Documents and records are required for this policy and procedure, for audit purposes and for planning, implementation, control, evaluation and overall management of the OHSMS. Documents and records are maintained, reviewed, electronically filed and stored in personnel files, or with the applicable project files. Documents and records are retained for a minimum of five years.

Supporting Documents

OHS Program Policy and Procedure
OHS Policy Statement
OHS Program
Worker OHS Manual
OHS Controls Manual
Glossary of Terms

Hazard Assessment, Analysis and Control Policy and Procedure

Objective

Our objective is to identify, assess, and mitigate workplace hazards through effective management and control measures, ensuring a safe and healthy environment for all employees and contractors. We strive to maintain comprehensive safety documentation to uphold the highest standards of workplace safety and compliance.

Policy Statement

Senior Management is committed to ensuring a safe and healthy work environment for all employees, contractors, and visitors. Our comprehensive approach to hazard management and the implementation of effective controls, are fundamental components of our safety culture and operational excellence.

Scope

This policy applies to every employee across all levels within the organization.

Definitions

Hazard

Any agent that can cause harm or damage to humans, property, or the environment.

Risk

The probability that exposure to a hazard will lead to a negative consequence.

Risk Assessment

A systematic process of evaluating (ranking) the potential risks that may be involved in a projected activity or undertaking.

Controls

Measures implemented to mitigate or eliminate workplace hazards.

Unsafe conditions

Circumstances, which could allow an accident to occur.

Risk Assessment

Failing to have a Hazard Management policy and procedures increases the likelihood of workplace accidents, injuries, and illnesses due to unrecognized or unaddressed hazards. This can lead to legal liabilities, financial losses, and damage to the organization's reputation. The organization has assessed this risk as an "A" hazard.

Responsibilities

Senior Management will:

- Provide leadership, resources, and support for the development, implementation, and continuous improvement of the Hazard Management policy.
- Ensure that the hazard management program complies with relevant OHS regulations, industry standards, and best practices.
- Communicate clear expectations and hold managers, supervisors, and employees accountable.
- Review and approve hazard management measures.
- Ensure adequate training and education on hazard identification, risk assessment, and control measures.
- Communicate information about hazards, control measures, and safety procedures to relevant employees.

Supervisors will:

- Facilitate the implementation of the Hazard Management policy, conducting risk assessments, coordinating training programs, and maintaining records of hazards and control measures.
- Serve as a central point of contact for OHS-related issues.

Workers will:

- Report actual and potential hazards to the supervisor.
- Inspect the workplace, equipment, machines, devices and PPE as required by management and always follow the manufacturer's recommendations.
- Actively participating in hazard identification, reporting actual and potential hazards to supervisors or H&S coordinators, and following established procedures for hazard controls.

Worker Representatives will:

- Report actual and potential hazards to management.
- Collaborate with management and workers to promote hazard awareness, participating in hazard assessments, and advocating for improvements in workplace safety.
- Serve as a liaison between workers and management on OHS matters.

Subcontractors will:

- Comply with the Hazard Management policy and procedures of the organization they are contracted with, identifying and managing hazards within their scope of work, and cooperating with the organization's OHS requirements.
- Communicate any hazards they encounter to the organization's management or supervisory personnel.

Procedures**Hazard Reporting**

- Any employee recognizing a hazard is to immediately inform their supervisor.
- The supervisor, will notify affected employees, either in person or through warning signs.
- The supervisor will give direction to correct the hazard in a safe manner.
- Where the correction of the hazard is beyond the span of control of the supervisor, the supervisor will stop work and contact senior management for further instruction.
- Management will take all necessary steps to correct the hazard.
- When reported hazards pose a serious risk and qualify as a "Dangerous Circumstance" under the OHS Act, the supervisor will halt all work until appropriate controls are developed and implemented to eliminate the hazard or, if elimination isn't feasible, reduce the risk to the lowest level possible.

Hazard Management

- Dolyn Construction Ltd. will take into account OHS risks and the corresponding control measures at every stage, by implementing the OHS Management Lifecycle as outlined in the organization's Leadership Policy and Procedure.
- The organizations will ensure that procedures for systematically identifying workplace hazards, assessing associated risks, and prioritizing control measures are developed, implemented, monitored and maintained following the procedures outlined in this policy and procedure.
- The organization will utilize input from relevant employees, supervisors, and OHS professionals and other parties, such as engineers and suppliers regarding identified hazards and potential risks linked to particular tasks, equipment, or processes, through JHSC agenda items, safety talks, formal risk assessment processes or by any other means deemed effective by Senior Management.

- All hazard management details, such as identifications, assessments, and control measures, will be documented, regularly updated, and easily accessible to all involved parties. This will be done using standard forms or checklists and by adhering to the organization's Document Control and Record Management Policy and Procedure (DRC D1).
- For the operations and/or activities where hazards have been identified and risks assessed, the organization will implement the OHS Management Lifecycle to adequately protect against or otherwise control the risks.
- The company will use a standardized risk rating system to as outlined in the organization's Determining Risk document (HM D2). Risks will be prioritize before identifying controls and residual risks will be identified after controls a have been developed.

Competent Person

- The organization will provide training to employees as needed for hazard identification, risk assessment, and control development, tailored to the extent of employee responsibilities.
- Competencies will include communication skills to convey hazard information and control measures to workers, and the ability to collaborate with workplace parties across different levels of the organization.
 - Hazard Identification:
 - Understanding of common workplace hazards relevant to the industry.
 - Familiarity with hazard identification techniques such as workplace inspections, job hazard analysis, and incident investigation.
 - Ability to recognize potential hazards in various work environments and tasks.
 - Risk Assessments:
 - Knowledge of risk assessment methodologies and tools.
 - Understanding of risk factors including likelihood and severity of harm, exposure duration, and number of workers affected.
 - Skills in evaluating and prioritizing risks based on the level of potential harm and likelihood of occurrence.
 - Implementing Controls:
 - Familiarity with the hierarchy of controls and selection of appropriate control measures.
 - Understanding of engineering controls, administrative controls, and personal protective equipment (PPE).
 - Ability to implement control measures effectively while considering feasibility, cost-effectiveness, and sustainability.

Risk Assessments will be conducted:

- By a competent person as defined in this policy, for all activities, involving the office, shop, routine and non-routine activities, critical tasks, external factors and human factors where work is performed.
- At least daily, to address actual and potential hazards, the associated risks, and the necessary controls to be implemented to eliminate or control the risks. Assessments will be documented as part of the daily safety talk process.
- Prior to introducing, starting up, or using new equipment, materials, substances, or processes, by consulting manufacturer's instructions, Safety Data Sheets (SDS), or other relevant documentation to identify potential hazards and ensure appropriate control measures are implemented.
- As part of the change management process when there is a change to existing equipment, material, chemical or process. Refer to the organization's Change Management Policy and Procedure. (CM D1).
- When there is a change to the OHSMS that may impact upon the workplace operations and/or activities.

- When hazards originate outside of the workplace that may impact OHS within the workplace for which the organization has control, such as air pollution, natural disasters, hazards associated with high crime work locations, or for workers working remotely.
- To identify workplace risks, including workspace layout, ergonomic conditions, machinery, and procedures, we will methodically evaluate these factors to prevent accidents and health concerns, ensuring a safe environment. Ergonomic assessments may be conducted. Results will be documented and kept on record.

Hazard Identification

- To ensure the safety and well-being of employees, it is essential to identify hazards and ensure that they are prioritized, this will be achieved by:
 - Conducting comprehensive workplace inspections and assessments to systematically identify and document all potential hazards present in the work environment.
 - Organizing and categorizing identified hazards into a hazard inventory (HM F!) database, ensuring that each entry includes relevant details such as description, associated risks, and control measures.
 - Keep a list of all "A" ranked hazards, referred to as critical tasks, as determined by the process outlined in this policy.
- When identifying hazards, the organization and all employees must consider hazards associated with, but not limited to:
 - Tasks carried out by employees while completing their work assignments such as operating heavy machinery, working at heights, and exposure to chemicals.
 - Hazards that originate outside of the workplace, that may impact OHS within the workplace, for which the organization has control, such as air pollution, natural disasters, or hazards associated with high crime work locations, or for workers working remotely.
 - Dolyn Construction Ltd. workers required to work at a location not under direct control of the organization such as employees performing field work or service calls at customer premises, construction sites, or other remote locations.
 - Activities carried out by individuals authorized to enter the workplace, including subcontractors, consultants, surveyors, utility workers, and others, and the potential hazards their tasks may pose to the organization's employees.
 - Compliance with legal obligations concerning work activities, including regulatory measures such as the OSHA and Regulations for Construction Projects or Environment and Climate Change Canada (ECCC).
 - The physical workplace, accounting for aspects like the spatial arrangement of workspaces, ergonomic conditions, machinery, and operational procedures with the objective to methodically evaluate these components to forestall accidents, injuries, or health concerns, thus fostering a secure work environment for employees.
 - Hazards related to the design and layout of the work area, installations, machinery, equipment, processes, and associated procedures or controls such as identifying slip, trip and fall hazards due to uneven flooring, hazards posed by unguarded machinery or equipment with moving parts or recognizing the dangers of exposure to noise or vibration.
 - Hazards related to human interaction within the workplace or any other human factors that may affect the OHS of workers or others such as identifying the risks of workplace violence, repetitive tasks that may lead to musculoskeletal disorders or recognizing the dangers of fatigue or stress from long work hours or demanding schedules.

- Hazards related to the initiation, utilization/operation, maintenance, and unexpected shutdowns of machinery, equipment, or processes such as moving parts or electrical hazards, risks of crushing or entanglement or release of hazardous substances due to equipment malfunction.
- The organization will assess hazards at different levels within the organization to include:
 - At least annually, the H&S Coordinator, in consultation with workers or their representatives, will review and update a list of actual and potential hazards. Identified hazards will be documented using the Hazard Inventory form (HM D2).
- Before starting a project, the project manager or supervisor must identify actual and potential hazards that employees may face. After identification, risk assessments will be conducted, hazards will be ranked, and appropriate controls will be developed and implemented.
 - Those conducting workplace inspections are responsible for identifying hazards. Once identified, risk assessments will be performed, hazards will be ranked, and appropriate actions will be taken to control the identified risks as necessary.
 - Workers must conduct visual pre-task hazard assessments. Identified hazards will be controlled, and if controls are not possible, workers will report them to the supervisor.

Evaluation

- Ensure ongoing monitoring and evaluation of control measures to verify their effectiveness.
- Hazard assessments will be reviewed and updated at least annually. They may also be updated as a result of incident investigations, in response to actual or potential emergency situations, when the project phase changes, or at any other time that would benefit the organization.
- Encourage continuous feedback from employees regarding the effectiveness of control measures and potential emerging hazards. initiatives.
- Use incident investigations, audits, and performance indicators to identify opportunities for improvement and adjust control measures accordingly.

Document Control

- The following Documents and records are required for this policy and procedure, for audit purposes and for planning, implementation, control, evaluation and overall management of the OHSMS. Documents and records are maintained, reviewed, electronically filed and stored in a master repository of documents. Documents and records are retained for a minimum of five years.

Supporting Documents

Hazard Management Policy and Procedure
Determining Risk
Hazard Inventory

Controls Policy and Procedure

Objective

The objective of this Controls Policy is to establish effective measures for identifying, assessing, and mitigating risks within the workplace. We aim to ensure compliance with safety regulations, and protect employee health, through consistent monitoring, training, and documentation of control measures.

Policy Statement

This Controls Policy commits to implementing effective risk management measures to identify, assess, and mitigate workplace hazards. We prioritize compliance with safety regulations, ensuring a safe environment for all employees and stakeholders through continuous monitoring, training, and documentation of control processes to uphold the highest safety standards.

Scope

This policy applies to every employee across all levels within the organization.

Definitions

Safe Work Practices (SWP)

Generally written methods outlining how to perform a task with minimum risk to people, equipment, materials, environment, and processes.

Safe Job Procedures (SJP)

A series of specific steps that guide a worker through a task from start to finish in a chronological order.

Hierarchy of Controls

A system used in OHS to prioritize and select the most effective measures for controlling workplace hazards. It consists of five levels, ranked from most effective to least effective:

- 1 Elimination: The highest level of control involves completely removing the hazard from the workplace. This eliminates the risk of exposure altogether.
- 2 Substitution: If elimination is not feasible, substitution involves replacing the hazardous substance, process, or equipment with a less hazardous alternative. This reduces the risk by using a safer option.
- 3 Engineering Controls: These controls modify the workplace or equipment to isolate workers from the hazard. Examples include installing ventilation systems, machine guarding, or using automated processes.
- 4 Administrative Controls: These controls focus on changing the way work is performed to reduce exposure to hazards. This can include implementing work procedures, training programs, or scheduling practices to minimize risk.
- 5 Personal Protective Equipment (PPE): PPE is the last line of defense and involves providing workers with equipment to protect themselves from the hazard. This includes items like gloves, safety glasses, respirators, and hearing protection.

Responsibilities

Senior Management will:

- Provide leadership, resources, and support for the development, implementation, and continuous improvement of the Controls policy.
- Ensure this program complies with relevant OHS regulations, industry standards, and best practices.
- Communicate clear expectations and hold managers, supervisors, and employees accountable.

- At the organizational level, review and approve Controls prior to them being implemented.
- Ensure adequate training and education on hazard identification, risk assessment, and control measures.
- Communicate information about hazards, control measures, and safety procedures to relevant employees.

Supervisors will:

- Implement and enforce the Controls Policy within their teams, ensuring employees understand their roles.
- Conduct inspections and assessments to identify hazards and ensure control measures are in place.
- Provide training and support to employees on safety practices and reporting procedures.

Workers will:

- Follow all established control measures and safety procedures as outlined in the Controls Policy.
- Report any hazards, incidents, or unsafe conditions to supervisors immediately.
- Participate in training sessions and contribute to discussions on safety improvements and best practices.

Worker Representatives will:

- Report actual and potential hazards to management.
- Act as a liaison between workers and management to communicate safety concerns and feedback regarding the Controls Policy.
- Assist in promoting a culture of safety by encouraging worker involvement in the development and implementation of controls.

Subcontractors will:

- Adhere to the organization's Controls Policy by implementing effective safety measures and complying with all relevant regulations while performing their work.
- Report any identified hazards, incidents, or safety concerns to the organization and collaborate on necessary corrective actions to ensure a safe work environment.

Procedures

- When determining control measures with respect to the identified hazards and prioritized risks, the organization will consider reducing the risk utilizing the hierarchy of controls principle as defined in this policy and procedure section 6.4.3.
- When developing controls, Senior Management will involve both management and workers to ensure comprehensive understanding and effective implementation of safety measures. This will follow the procedures outlined in the organization's Worker Participation Policy and Procedures (WP D1).
- Control measures will identify hazards and eliminate or reduce the risk to as low as reasonably achievable level, and will take into account issues relevant to control measures, such as:
 - When determining control measures, the organization will consider:
 - The nature of the hazards and risks such as exposure to harmful chemicals, working at heights or operating heavy machinery.
 - The extent of hazards and risks includes: 1) identifying who may be exposed to hazards from workplace operations or activities, 2) determining the scope of application across large areas or multiple workstations, and 3) assessing the work environment, such as confined spaces or extreme outdoor temperatures.
 - Determining control measures for purchased goods, equipment, and services, by referring to available information such as manufacturer's instructions, industry risk reduction strategies, and relevant safety standards and regulations.

- Control specifications as stipulated in relevant legal and regulatory mandates, ensuring compliance with applicable requirements such those governing traffic controls, confined space workers and disposal of hazardous waste.
 - Control specifications must adhere to relevant standards, requirements, guidelines, and codes of practice, including manufacturer/supplier instructions and considerations related to the organization's operations. This includes compliance with Canadian Standards Association (CSA) standards, such as the National Fire Code of Canada (NFC).
 - Potential consequences and severity of injury or illness, as they relate to the possible outcomes if the hazards are not adequately controlled, such as injuries, illnesses, property damage, or environmental harm that will determine the priority of control measures.
 - Controls specific to workers involved in a work process by defining the tasks involved, and consulting with relevant stakeholders to identify roles, responsibilities and PPE requirements.
 - Streamlining hazard management for purchased goods, equipment, and services by referring to supplier or manufacturer-provided documentation like product specifications, user manuals, and safety data sheets.
- Controls will identify hazards and eliminate or reduce the risk to as low as reasonably achievable level.

Control Approval

Controls will be approved in compliance with the procedures outlined in the organization's Document Management and Records Controls Policy and Procedure (DRC D1). Controls will be documented, reviewed, approved, dated and signed off by Senior Management prior to being implemented. This will be achieved:

- At the organizational level by having Senior Management review and approve controls.
- At the site level by having the supervisor review and approve controls. Depending on the risk rank, the supervisor will document controls using specific forms, through safety talks, entries in a log book or by any other means deemed effective by Senior Management.

Communication

- The H&S Coordinator and supervisors will communicate control measures and any revisions to Senior Management and relevant parties, including workers and subcontractors, through safety talks, emails, newsletters, or other effective methods determined by Senior Management.
- The H&S Coordinator will ensure that all elements affected by implemented CAPAs are updated in the OHSMS to reflect current practices and procedures.
- Any revisions to the organization's procedures will be communicated promptly to all employees and all relevant workplace parties.

Availability

- The H&S Coordinator, or their delegate, is responsible for ensuring all documented controls are readily available at the point of use, whether electronically, posted, or in on-site safety binders. Periodic audits will verify the availability and accuracy of this documentation, addressing discrepancies to maintain compliance and safety. A registry of identified hazards and controls will be kept in the Controls Manual, located in section one of all On-Site Safety Binders, designed to reflect actual work activities in offices, sites, and vehicles.

Evaluation

- Ensure ongoing monitoring and evaluation of control measures to verify their effectiveness.

Document Control

- The following Documents and records are required for this policy and procedure, for audit purposes and for planning, implementation, control, evaluation and overall management of the OHSMS. Documents and records are maintained, reviewed, electronically filed and stored in a master repository of documents. Documents and records are retained for a minimum of five years.

Supporting Documents

Controls Policy and Procedure

Controls Manual

Subcontractor Management Policy and Procedure

Objective

The objective of this Subcontractor Policy and Procedure is to establish guidelines for the evaluation, selection, and management of subcontractor who provide products, supplies, equipment, materials, and other goods and services to the organization. This policy also ensures that subcontractor adhere to OHS standards and align with the organization's hazard management methodology.

Policy Statement

Senior Management is committed to procuring products and services from reputable subcontractors who meet high standards of quality, safety, and reliability. We prioritize the OHS of our workers and contractors, and therefore, all subcontractor must comply with OHS regulations and demonstrate competency in identifying and controlling hazards associated with their activities. This policy aims to mitigate risks, foster positive vendor relationships, and ensure effective communication and collaboration with contractors at multi-employer workplaces or multi-contractor worksites.

Risk Assessment

Failing to have a Subcontractor Management policy can lead to increased risk of workplace accidents and injuries due to insufficient vetting of subcontractor safety practices and standards. Additionally, lacking clear guidelines for OHS management among subcontractors can result in legal liabilities, reputational damage, and regulatory non-compliance for the organization. The organization has assessed this risk as an "A" hazard.

Responsibilities

Senior Management will:

- Utilize the OHS Management Lifecycle when developing a policy and procedures for the selection, evaluation and management of the procurement of products, supplies, equipment, materials, and other goods and services and subcontractors.
- Ensure that the hazard management methodology is used for procured goods and subcontractors align with the organization's Hazard Management Policy and Procedure (HM D1).
- Utilize the OHS Management Lifecycle and create a criteria for monitoring and evaluating subcontractor's OHS performance during all phases of the work.
- Ensure the all aspects of the Subcontractor Policy and Procedure is followed:
- Communicate with subcontractors, changes that affect specific work or circumstances surrounding the work.

H&S Coordinator will:

- Provide guidance and support to personnel tasked with procurement responsibilities.
- Ensure subcontractors comply with OHS regulations and demonstrate competency in identifying and controlling hazards associated with their activities.
- Participate in the coordination and integration of relevant portions of the organization's OHSMS with affected contractors at multi-employer workplaces or multi-contractor worksites.
- Ensure subcontractor OHS performance is monitored throughout the duration of contracts.
- Address non-conformities or concerns related to subcontractors performance promptly and effectively.

Supervisors will:

- Serve as the primary point of contact for subcontractors.
- Provide subcontractors with guidance and support regarding OHS requirements and hazard management.
- Monitor subcontractor compliance with OHS regulations and address any issues or concerns raised.
- Conduct evaluations of subcontractor performance and provide feedback for improvement as necessary.

Procedures

Procurement Procedure:

- A competent person will identify procurement needs and research potential suppliers.
- Hazard identification and risk assessments will be conducted by a competent person, in compliance with the organization's Hazard Management Policy and Procedure (HM D1).
- Controls will be developed for identified hazards.

Selection of Subcontractors

Determine Subcontractor Needs:

- Review project specifications, scope of work, and timeline to determine subcontracting needs.
- Identify specific skill sets, qualifications, and resources required from subcontractors.

Prequalification Process:

- Develop prequalification criteria for OHS performance and expectations.
- Require subcontractors to submit all required prequalification documents.
- When assessing a contractor's competency and ability to control risks, the organization will request and review, at a minimum each subcontractors:
 - WSIB Clearance Certificate (within 60 days).
 - Up-to-date Liability Insurance Certificate.
 - Formal Hazard Assessment.
 - Worker training qualifications or Training spreadsheet.
 - Subcontractor 's H&S Program.
 - Dolyn Construction Ltd.'s OHS program.

Hazard Assessments

- A competent person, trained in hazard management methodologies as outlined in the organization's Hazard Management Policy and Procedure, will conduct a hazard assessment to identify hazards related to its activities and materials, implemented suitable risk control measures, and ensured that the subcontractor possesses the necessary competency and ability to safeguard the safety of their own workers while carrying out tasks for the Dolyn Construction Ltd..
- Subcontractors will be required to provide Dolyn Construction Ltd. with a hazard assessment, meeting the requirements outlined in the Dolyn Construction Ltd. Hazard Management Policy and Procedure (HM D1), demonstrating that they have identified hazards related to the work activities they will be performing and the tools and materials they will be using, and that they implemented suitable risk control measures to adequately protect against or otherwise control the risks.
- Where hazards have been identified and risks assessed, the organization will ensure that control measures are established, implemented, monitored and maintained.

Selection

- Track subcontractor submissions using the organization's Subcontractor Checklist form (SM F2) and review based on technical qualifications, pricing, schedule, and compliance with project requirements.
- Determine the ability of the contractor to be able to assess/analyze and control hazards arising from their own work that may impact the organization's workers will be determined by referencing the subcontractors accident history as recorded by the WSIB. Only those with a low accident rate will be considered.
- Determine the ability of the contractor to be able too assess/analyze and control hazards arising from the organizations work that may impact the contractor's workers will be determined by referencing the subcontractors accident history against the results of similar businesses, as recorded by the WSIB. Only those with lower than average accident rates will be considered.
- Select subcontractors who offer the best combination of technical expertise, value, and alignment with the organization's OHS objectives.
- Draft Subcontract Agreements (SM F1) outlining OHS requirement.
- Upon completion of the Subcontractor Checklist add the subcontractor to the Approved Subcontractor List (SM F3).

Monitoring

- Supervisors will continuously monitor subcontractor performance throughout the duration of the project, documenting observations and any instances of non-compliance or underperformance.
- Conduct periodic site inspections to ensure subcontractors are adhering to project specifications, safety standards, and quality requirements. Include subcontractors in all workplace Inspection results.
- Involve subcontractor employees or their representatives in all on-site safety discussions and site meetings, allowing them the chance to give feedback.
- Provide regular feedback to subcontractors on their performance, areas of strength and for improvement.
- Encourage open communication and collaboration between the project team and subcontractors to address issues proactively and foster a positive working relationship.

Evaluation

- Conduct and document, using the organization's Subcontractor Evaluation form (SM F4), performance reviews at predefined intervals, such as monthly, quarterly. Or at the end of the project, to assess subcontractor performance.
- Document performance review findings, including strengths, weaknesses, and areas for development, and communicate them to subcontractors for improvement.
- Evaluate subcontractors' overall performance at the end of the project or contract term to determine whether to renew or terminate the relationship.

Communication of Change

- When changes occur that affect specific work or circumstances surrounding the work, the project manager or designated representative will promptly notify the contractors involved.
- The communication will detail the nature of the changes, their impact on the project timeline, scope, or requirements, and any adjustments required from the contractors.
- Contractors will be given the opportunity to provide feedback, propose solutions, and adjust their work plans accordingly to ensure alignment with the updated project parameters.

Multi-Employer/Subcontractor Workplaces

- Subcontractors must acknowledge, by completing the organization's Multi-Subcontractor Agreement for OHS Integration form (SM F5), that Dolyn Construction Ltd., bears ultimate responsibility for supervising OHS across the worksite. Hence, the organization assumes the lead role in coordinating site-specific OHS requirements. Documentation of subcontractors' acknowledgment of the organization's responsibility for OHS may include one or more of the following:
 - Contractual Agreements
 - Acknowledgment Forms
 - Orientation Materials
 - Communication Logs
- Lead the coordination efforts by communicating OHS requirements, providing necessary training, and ensuring compliance with safety regulations among all contractors involved.
- Provide contractors with access to relevant portions of the organization's OHSMS and conduct site orientations.
- Monitor and maintain the effectiveness of the integrated OHS management system, regularly reviewing procedures, conducting audits, and addressing any identified gaps or issues promptly.
- The multi-subcontractor agreement establishes a structured approach to integrating Dolyn Construction Ltd.'s OHSMS with subcontractors, fostering collaboration and shared responsibility for OHS management at multi-employer workplaces or worksites.

Document Control

- The following Documents and records are required for this policy and procedure, for audit purposes and for planning, implementation, control, evaluation and overall management of the OHSMS. Documents and records are maintained, reviewed, electronically filed and stored in personnel files, or with the applicable project files. Documents and records are retained for a minimum of five years.

Procedure for Managing Health and Safety of Subcontractors Hiring Subcontractors

Prequalification of Subcontractors and Their Subcontractors

- Review Qualifications: Ensure that all subcontractors (first- and second-tier) have adequate qualifications, certifications, and experience relevant to their roles.
- Evaluate Health and Safety Records: Examine the safety records, policies, and past performance of subcontractors to determine their commitment to safety.
- Verify Insurance and Licensing: Confirm that all subcontractors carry the necessary insurance coverage and are properly licensed to work on the project.

Safety Orientation and Training

- Conduct Safety Orientation: All subcontractors must attend an initial safety orientation, which includes general site rules and specific project hazards.
- Document Training Requirements: Specify any mandatory health and safety training required by subcontractors for their own workforce.
- Verify Training Completion: Collect records from subcontractors to confirm their workers have completed required training.

Risk Assessment and Job Hazard Analysis (JHA)

- **Perform Site-Specific Risk Assessments:** The main contractor should conduct a risk assessment to identify potential hazards and establish controls. Require subcontractors to perform their own JHAs and submit them for review.
- **Identify and Control Hazards for Second-Tier Workers:** Ensure that subcontractors provide a hazard analysis specific to their tasks and implement control measures for identified risks.

Health and Safety Plans

- **Require a Site-Specific Safety Plan:** Each subcontractor must develop and submit a safety plan that addresses the project's specific hazards.
- **Review and Approve Safety Plans:** Review each subcontractor's plan to ensure it aligns with the primary contractor's standards and regulatory requirements.
- **Update Plans as Necessary:** If conditions change, require subcontractors to update and resubmit their safety plans.

Communication of Health and Safety Expectations

- **Set Clear Expectations for Safety Compliance:** Inform all subcontractors that adherence to health and safety requirements is mandatory, and outline consequences for non-compliance.
- **Establish Communication Protocols:** Set up regular meetings to discuss safety issues and ensure clear communication channels among all parties.

Site Inspections and Audits

- **Conduct Routine Inspections:** Perform periodic inspections to confirm that subcontractors and their subcontractors are complying with safety protocols.
- **Enforce Corrective Actions:** If non-compliance is identified, require immediate corrective action, and follow up to ensure the issue is resolved.

Incident Reporting and Investigation

- **Define Incident Reporting Procedures:** All subcontractors must report any incidents, near misses, or unsafe conditions immediately.
- **Conduct Investigations as Needed:** Investigate incidents to determine the root cause and ensure that corrective actions are implemented.
- **Share Lessons Learned:** Communicate lessons learned from incidents to prevent recurrence among all project teams.

Ongoing Monitoring and Evaluation

- **Review Performance Metrics:** Track health and safety performance metrics for all subcontractors to monitor trends and identify areas for improvement.
- **Provide Feedback and Adjust Expectations:** Give subcontractors feedback on their performance and adjust safety expectations or procedures as necessary.
- **Conduct Final Evaluation:** At the project's completion, evaluate the health and safety performance of all subcontractors for future project considerations.

Termination for Non-Compliance

- Define Consequences for Safety Violations: Establish and communicate consequences for repeated or serious safety violations, up to and including termination of the subcontractor's contract.
- Document Non-Compliance Issues: Maintain a record of any non-compliance incidents for reference in future subcontractor evaluations.

Supporting Documents

Subcontractor Management Policy and Procedure
Subcontractor Agreement
Subcontractor Checklist
Approved Subcontractor List
Subcontractor Evaluation
Multi-Subcontractor Agreement for OHS Integration

Organization Rules

Objective

The objective of our Organization Rules is to create a framework that fosters a respectful, safe, and productive work environment, enhances teamwork, ensures compliance, and supports our mission, empowering employees to collaborate and contribute effectively.

Policy Statement

Our Organization Rules ensure a respectful, safe, and productive workplace by setting clear standards for behavior. We promote teamwork, compliance with legal and ethical guidelines, and a culture of accountability, empowering employees to collaborate effectively and achieve shared goals.

Scope

This policy applies to every employee across all levels within the organization.

Responsibilities

Senior Management:

- Develop, implement, and effectively communicate the organization's rules to ensure all employees understand expectations and guidelines for behavior.
- Regularly assess adherence to the organization's rules, addressing any violations promptly to maintain a respectful and productive work environment.
- Promote a culture of accountability and support, encouraging employees to uphold the rules and contribute to a collaborative workplace.

Supervisors and Management will:

- Monitor employee adherence to organization rules, addressing violations promptly and fairly to ensure a respectful and productive workplace.
- Offer ongoing support and clarification regarding organization rules, helping team members understand expectations and their importance.
- Foster an environment where employees feel comfortable discussing concerns or suggestions related to organization rules, promoting transparency and collaboration.

Employees will:

- Understand and comply with all organization rules and guidelines, ensuring a respectful and productive work environment for all.
- Promptly report any observed violations of organization rules to supervisors or management to help maintain accountability and a safe workplace.
- Share feedback or suggestions regarding organization rules with supervisors, contributing to a culture of continuous improvement and collaboration.

Procedures

Organization Rules:

- The organization will clearly communicate its rules, adherence expectations, and non-compliance consequences to all personnel—employees, contractors, and suppliers—through a qualified individual. Communication will be tailored to the audience's understanding, considering their abilities and language skills, using methods like site orientation, safety talks, and posters. Rules will also be included in Worker OHS Manuals, posted on bulletin boards, and reinforced during annual safety meetings.

Site Rules

- Site-specific safety rules will be established by the supervisor prior to the commencement of work on a project, and will be revised as necessary. Rules, the expectation of adherence by all personnel, and the consequences for non-compliance, will be communicated and explained, by a competent person, to all personnel upon entering the worksite for the first time and will be delivered in a manner that is understood by the receiver of the message and considers ability, language skills and literacy. Information will be provided clearly and in easily understood terms, with translated materials, training, or visual aids as needed. This communication will occur through site orientation, safety talks, posters, postings, or any other method deemed effective by the supervisor.
- Supervisors may revise or include additional rules, throughout the project, as necessary.

Compliance

- All employees must adhere to rules, relevant laws, and ethical guidelines. Non-compliance may result in disciplinary action.

Reporting Violations

- Employees will be encouraged to report any violations of established rules to their supervisor or the H&S Coordinator without fear of retaliation.

Progressive Discipline

- Involves a series of escalating steps aimed at correcting and improving employee behaviour while providing opportunities for the employee to understand and rectify their actions, for example:
 - 1 Verbal Warning: The first step involves an informal discussion about the issue, clarifying expectations and consequences.
 - 2 Final Written Warning or Suspension: If issues continue, a final written warning will be given, or a suspension will be implemented, emphasizing the seriousness of the situation.
 - 3 Termination: If there is no improvement after the previous steps have been implemented, termination of employment will occur as a last resort.

Immediate Termination

- Employment will be terminated for any worker who demonstrates willful disregard for their own safety or the safety of others.

Record Keeping

- All organization rules and policies will be kept current and maintained as necessary, will be made easily accessible to all employees for reference and compliance.
- Detailed records of any violations of organization rules including the nature of the incident, actions taken, and outcomes, to track patterns and inform future training will be kept, designated as confidential and will be filed in personnel files.

Training and Awareness

- The organization will provide training on these rules to ensure all employees understand their responsibilities and the importance of compliance.

Review

- This policy will be reviewed annually and amended as necessary to reflect changes in the workplace or legal requirements.

Document Control

- The following Documents and records are required for this policy and procedure, for audit purposes and for planning, implementation, control, evaluation and overall management of the OHSMS. Documents and records will be reviewed, electronically filed and stored with the project where the inspection occurred, in individual supervisor files or in a designated Workplace Inspection file.

Supporting Documents

Organization Rules Policy and Procedure
Organization Rules
Site Rules
Enforcement Notification

Personal Protective Equipment (PPE) Policy and Procedure

Objective

The objective of this PPE Policy is to establishing clear guidelines for the selection, use, maintenance, and training related to personal protective equipment. We aim to minimize workplace hazards and comply with relevant safety regulations, fostering a culture of safety and awareness.

Policy Statement

Senior Management commits to providing appropriate personal protective equipment to all employees, ensuring its proper use, maintenance, and training. We prioritize employee safety by complying with relevant regulations and fostering a culture of awareness and responsibility regarding the use of PPE in the workplace.

Scope

This policy applies to every employee across all levels within the organization.

Risk Assessment

Failing to have a PPE policy and procedures increases the likelihood of workplace accidents, injuries, and illnesses due to unrecognized or unaddressed hazards. This can lead to legal liabilities, financial losses, and damage to the organization's reputation. The organization has assessed this risk as aa "A" hazard.

Responsibilities

Senior Management will:

- Ensure the development and implementation of a comprehensive PPE Policy that meets regulatory standards.
- Allocate resources for the procurement, maintenance, and training related to PPE.
- Promote a culture of safety by encouraging employee compliance with PPE guidelines.
- Conduct regular reviews and updates of the PPE Policy based on feedback and changing regulations.
- Monitor and evaluate the effectiveness of PPE usage and compliance throughout the organization.
- Provide support for training programs that educate employees on proper PPE selection, use, fit and maintenance.

Supervisors will:

- Ensure employees are properly trained in the selection, use, fit, and maintenance of PPE.
- Monitor compliance with the PPE Policy and address any non-compliance or safety concerns promptly.
- Conduct inspections to ensure that appropriate PPE is available, in good condition, and used correctly.

Workers will:

- Properly wear and maintain PPE as required by the PPE Policy and specific job tasks.
- Report any damaged or inadequate PPE to supervisors immediately to ensure safety.
- Participate in training sessions and adhere to guidelines regarding the selection and use of PPE.

Worker Representatives will:

- Act as a liaison between workers and management to communicate concerns and suggestions related to PPE use and policies.
- Participate in safety meetings and trainings, representing the interests of workers regarding PPE matters.
- Assist in promoting awareness of PPE requirements and encourage compliance among team members.

Subcontractors will:

- Ensure that all workers comply with the organization's PPE Policy and use the required personal protective equipment while on-site.
- Provide their employees with appropriate PPE and ensure it is maintained in good condition, reporting any issues to the organization promptly.

Procedures

Personal Protective Equipment (PPE)

- Senior Management will designate a competent person to be responsible for overseeing the implementation and enforcement of PPE procedures and will allocate necessary resources for the procurement, maintenance, and training related to PPE.
- Supervisors will ensure compliance with PPE procedures and will provide guidance and support to workers regarding the proper selection, fit, care, and use of PPE.
- Workers will wear appropriate PPE as instructed and required for the tasks being performed and must participate in PPE training and follow established guidelines for its fit, use and maintenance.
- Employees will report to the supervisor any defects, malfunctions, or discomfort experienced while using their PPE.

Documentation of Activities Requiring PPE:

- Maintain records identifying tasks or activities that require the use of PPE, as outlined in the organization's Controls Manual (PROG D5).
- Ensure all entries in the Controls Manual include a section dedicated to PPE requirements.
- Regularly update documentation to reflect changes in processes or workplace conditions.

PPE Selection:

- The procedure for selecting PPE will involve assessing the specific hazards associated with the task to determine the appropriate type of protective equipment needed. Once identified, employees must ensure the selected PPE meets relevant safety standards and is properly fitted for effective protection.

Fit, Care, and Use of PPE:

- Senior Management will develop written procedures detailing the proper fitting, care, and use of each type of PPE utilized in the workplace. Refer to the organization's PPE Rules and Guidelines (HM D5).
- Management will ensure that employees, contractors, and relevant parties are informed about the proper fitting, care, and use of all PPE. Information will be clear and accessible, accommodating language and literacy levels, and may include translated materials, training, or visual aids. Communication will take place through orientations, safety talks, posters, and other effective methods.
- Conduct regular training sessions to ensure all workers are familiar with and adhere to these guidelines.

Provision of Appropriate PPE:

- Ensure that adequate supplies of required PPE are readily available for workers.
- Procure PPE that meets relevant safety standards and is suitable for the intended tasks.
- An adequate stock of PPE will be kept at a designated location. Supervisors will request PPE be made available on site, as required. Damaged/expired PPE will be replaced.
- Supervisors will ensure that the required PPE is available on site in adequate quantities for both routine and critical tasks before work begins.
- Workers will report to their supervisor when they require new PPE, or need to replace damaged PPE.

Inspection and Maintenance Requirements:

- PPE must be inspected prior to use and in compliance with the manufacturer's Instructions and legislative requirements. Supervisors will ensure PPE inspection before use through observations, conducting random visual checks or by any other means deemed effective by the supervisor.
- Supervisors will conduct regular inspections to identify and address any defects or deficiencies in PPE.
- Inspection and maintenance activities, including repairs and replacements, will be documented using specific forms designated for that purpose, and will be recorded on site inspections reports.
- For more details on PPE Inspections, refer to the organization's Workplace Inspection Policy (WI D1).

Ensuring Compliance

- PPE selection and requirements, the expectation of adherence by all personnel, and the consequences for non-compliance, will be communicated and explained, by a competent person, to all personnel upon entering the worksite for the first time and will be delivered in a manner that is understood by the receiver of the message and considers ability, language skills and literacy. Information will be provided clearly and in easily understood terms, with translated materials, training, or visual aids as needed. This communication will occur through site orientation, safety talks, posters, postings, or any other method deemed effective by the supervisor.
- Document communication utilizing safety talks and/or site-specific orientations.
- Monitor and enforce compliance with PPE procedures among all relevant parties.
- Incorporate PPE requirements into contractual agreements with subcontractors and service providers.

Evaluation:

- At least annually an audit of the PPE Program will be conducted to assess compliance with safety standards and effectiveness in hazard mitigation.
- Feedback from employees and contractors will be gathered on the usability and adequacy of provided PPE.
- At least annually, a competent person will review incident reports and near-miss situations to identify potential improvements in PPE selection and usage.
- Senior Management will ensure that updates to the PPE Program based on evaluation findings, regulatory changes, and advancements in safety technology, are documented and implemented.

Document Control:

- The following Documents and records are required for this policy and procedure, for audit purposes and for planning, implementation, control, evaluation and overall management of the OHSMS. Documents and records are maintained, reviewed, electronically filed and stored in a master repository of documents. Documents and records are retained for a minimum of five years.

Supporting Documents

PPE Policy and Procedure

PPE/Safety Device Selection Criteria Chart

PPE Rules and Guidelines

Preventative Maintenance

Objective

The objective of this Preventative Maintenance Policy is to ensure equipment and facilities are maintained in optimal condition, minimizing downtime and repair costs, enhancing safety and productivity, and fostering a culture of proactive maintenance through regular inspections and timely interventions.

Policy Statement

Senior Management is committed to implementing a preventative maintenance program that prioritizes routine inspections, scheduled maintenance, and timely repairs to maintain optimal performance and safety standards.

Scope

This policy applies to all facilities, equipment, and machinery owned and operated by Dolyn Construction Ltd.. It encompasses all departments that utilize such assets.

Responsibilities

Senior Management will:

- Provide clear leadership and support for the implementation and enforcement of the Preventative Maintenance Policy across all departments.
- Establish and monitor the effectiveness of the preventative maintenance procedures and make necessary adjustments.
- Ensure adherence to safety regulations and industry standards in all maintenance activities, promoting a culture of safety and accountability.
- Regularly review and update the maintenance policy and procedures based on feedback and performance outcomes.

Preventative Maintenance Coordinator:

- Oversee the execution of the Preventative Maintenance Policy, ensuring that maintenance tasks are completed according to established schedules and procedures.
- Provide training and guidance to team members on proper maintenance practices, safety protocols, and the importance of preventative maintenance.
- Maintain accurate records of maintenance activities, inspections, and repairs, and report any issues or deviations to senior management.

Employees will:

- Adhere to established preventative maintenance procedures and schedules to ensure equipment and facilities are maintained properly.
- Promptly report any equipment malfunctions, safety hazards, or maintenance needs to supervisors to facilitate timely interventions.
- Engage in training sessions on preventative maintenance practices and safety protocols to enhance skills and knowledge.
- Accurately complete maintenance logs and documentation as required, ensuring all activities are recorded for accountability.
- Follow all safety guidelines and practices during maintenance activities, fostering a culture of safety within the workplace.

Procedures

Pre-Use Inspections:

- Will be conducted by all workplace parties prior to use of the vehicle, machine, tool and equipment as determined by management or the supervisor.
- Inspectors will identify all non-conformities and will implement corrective action, where possible. If it is not possible to implement necessary corrective actions, the vehicle, machine, tool and equipment will be tagged and removed from service and not returned to service until repairs have been made.
- Pre-use inspection results will be recorded on the specific forms developed for that purpose.
- Inspector will be provided training relevant to what they will be required to perform inspections on. At a minimum, training will include all items outlined in 13.5.1.

Preventative Maintenance Inventory:

- A competent person will compile a comprehensive list of all facilities, tools, equipment, machinery, and vehicles needing regular maintenance, including damaged items, regardless of ownership.
- The inventory will encompass office, shop, and on-site equipment, and will be recorded using the Preventative Maintenance Inventory form.
- Existing records will be reviewed, and physical inspections will be conducted to ensure the completeness of the inventory.
- Each entry will include relevant details such as asset type, location, maintenance schedule, and responsible personnel, and the inventory will be reviewed and updated at least annually.

Preventative Maintenance Schedule:

- Manufacturer's recommendations for each piece of equipment, will be examined to establish initial maintenance intervals and specific requirements based on usage and operating conditions.
- Identify the organization's assets and identify those that pose the highest risk in case of failure, and prioritize their maintenance schedules accordingly.
- Review past maintenance records and performance data to identify patterns or trends in equipment failures, which can inform adjustments to maintenance frequency and methods.

Preventative Maintenance Work:

- Preventative maintenance will adhere to manufacturers' guidelines and legal requirements by referencing regulations and guidelines, incorporating manufacturers' guidelines into checklists, and obtaining owners' manuals if necessary.
- The organization will designate a specific person to oversee the completion of maintenance tasks, ensuring they are accountable for verifying that all work is performed according to established schedules and standards.
- Develop a system for logging any non-conformities identified during maintenance inspections or operations, including details on the issue, affected equipment, and immediate risks.
- Promptly address identified non-conformities, including assigning corrective tasks to an in-house technician or arranging for the equipment to be sent to a reputable repair company.
- Once corrective actions are completed, conduct a final inspection to confirm that all issues have been resolved, then update maintenance records and formally return the equipment to service with appropriate documentation.

- Maintenance Reports will be filled out by the individual conducting in-house maintenance work, and will include corrective actions taken to rectify any non-conformities. Records will be administered in compliance with the procedures outlined in the Document Control section of this procedure.
- The organization will ensure that employees conducting maintenance have current qualifications and training. This will be documented by maintaining records of in-house technicians, posting certificates, and conducting recertification as needed.

Defective and Overdue for Service:

- Defective equipment must be reported to the supervisor, who will attach a Defective Equipment tag, arrange for removal from the worksite, repair by a qualified person, and retain a copy of the completed report for at least 5 years, as detailed in the Documents, Records, and Forms section of the procedure.
- Workers must report any vehicle, machine, tool, or equipment overdue for service to the supervisor, who will attach an Overdue for Service tag, arrange its removal, ensure service by a qualified person, retain a copy of the report for at least 5 years, as outlined in the Documents, Records, and Forms section.

Review:

- The Preventative Maintenance program will be reviewed annually to assess effectiveness and identify areas for improvement.
- The organization will collect input from maintenance personnel, and equipment operators to identify potential improvements, challenges faced, and any changes in operational needs since the last review.
- Maintenance completion rates, equipment downtime, and incident reports, will be assessed to determine the effectiveness of the current policy and identify areas for enhancement.
- This policy will be revised based on the review findings and feedback, ensuring that all relevant staff are informed of any changes and trained on new procedures or requirements.

Document Control:

- The following Documents and records are required for this policy and procedure, for audit purposes and for planning, implementation, control, evaluation and overall management of the OHSMS. Documents and records will be reviewed, electronically filed and stored with the project where the inspection occurred, in individual supervisor files or in a designated Workplace Inspection file.

Supporting Documents

Preventative Maintenance Policy and Procedure
Preventative Maintenance Inventory
Preventative Maintenance Schedule
Maintenance/Repair Report
Defective Tag
Overdue for Service Tag

Training, Competency and Orientation Policy and Procedure

Objective

The objective of this training, competency, and orientation policy and procedures is to ensure that employees are equipped with the knowledge, skills, and resources they need to perform their jobs effectively and safely.

Policy Statement

Senior Management is committed to providing comprehensive and effective training programs to ensure the safety, competency, and professional development of all employees. Our training policy aims to identify and address the learning needs of our workforce, equipping them with the knowledge, skills, and resources necessary to excel in their roles while promoting a culture of continuous learning and improvement.

Risk Assessment

Failing to have a training, competency, and orientation policy can result in employees lacking the necessary skills and knowledge to perform their jobs safely and effectively, increasing the risk of accidents, injuries, and errors in the workplace. The organization has assessed this risk as an "A" hazard.

Definitions

Orientation:

Familiarizing employees with the OHSMS, including its policies, procedures, and requirements, to ensure their understanding and compliance with safety procedures in the workplace.

Site-Specific Orientation:

Familiarizing workers with specific safety procedures, hazards, and emergency procedures relevant to a particular work site or location. It ensures that workers are aware of site-specific risks and are equipped to navigate them safely. Refer to the organization's Communication Policy and Procedure (COM D1).

Employees:

For the purpose of this policy, training requirements will apply to:

- Existing employees.
- New hires, coop students and volunteers.
- Any employee returning from an extended absence over three months.

Training Needs Analysis (TNA):

A systematic process used to identify gaps between the current skills and knowledge of employees and the skills and knowledge required to perform their jobs effectively.

Scope:

This policy and procedure for training, competency, and orientation will be applicable to all employees throughout the organization.

Responsibilities

Senior Management will:

- Ensure the implementation of the OHS Management Lifecycle process, as outlined in our OHS Management Lifecycle document (LEA D5) when developing this policy, procedures, processes to ensure all necessary considerations are addressed.
- Provide leadership and commitment to the implementation of OHS competency and training programs.
- Allocate resources necessary for the development and delivery of effective training initiatives.

- Establish clear objectives and targets for OHS competency and training.
- Monitor and review the effectiveness of the competency and training programs regularly.
- Ensure that all employees and contractors are aware of their responsibilities regarding OHS competency and training.

H&S Coordinator will:

- Arrange for training programs in accordance with regulatory requirements and organizational needs.
- Assist in the identification of relevant training needs based on job roles, tasks, and workplace hazards.
- Evaluate the effectiveness of training programs through performance assessments, and feedback.
- Provide guidance and support supervisors in implementing OHS competency and training initiatives.

Management and Supervisors will:

- Ensure employees under their supervision, receive appropriate training relevant to their roles and tasks.
- Encourage active participation in training activities and promote a culture of continuous learning.
- Monitor employee competency and address any gaps through additional training or coaching.
- Lead by example by adhering to OHS procedures and promoting safe work practices.
- Communicate OHS expectations clearly to their teams and provide necessary support for compliance.

Employees will:

- Participate actively in OHS competency and training programs as required for their job roles.
- Follow all safety procedures and guidelines provided during training sessions and in the workplace.
- Report hazards, near misses, or incidents promptly to their supervisors or the H&S coordinator.
- Seek clarification or additional training if they feel they inadequately prepared to perform tasks safely.
- Take responsibility for their safety and the safety of their colleagues.

H&S Consultants will:

- Assist management in setting annual training goals and objectives.
- Report untrained workers to the supervisor, H&S coordinator or management.
- Assist in the development of training programs to meet the needs of the organization.
- When requested, deliver training for which they are qualified to train.
- Provide to the organization all training related course materials and records.
- Assist management in the annual review of this program.

Competency Requirements:

- Ensure Dolyn Construction Ltd. employees are made aware of the hazards and risks associated with the tasks they are required to perform through one-on-one instruction, as part of the orientation process for new workers and site orientations, or through one or more of the following, or by any other means deemed effective by senior management.
 - Safety Talks
 - H&S Meetings
 - Newsletter Articles
 - Formal Training
- The organization will compile a list of competencies required for various roles and tasks carried out within the organization. Refer to Competency Matrix (TRA D3).
- Employees will be instructed to seek clarification or additional training if they feel they inadequately prepared to perform tasks safely.

- Employees will receive training the hazards, risks and associated control measures, specific to the work tasks they will be required to perform, prior to the commencement of performing the work task, to ensure they have adequate knowledge of the hazards and risks associated with the tasks. Training will be delivered by a competent person through formal training sessions, safety talks or person-to-person.
- Employees will be required to demonstrate understanding and working knowledge of the control measures associated with the hazards and risks. Methodologies used to demonstrate competency in risk management will include, but not limited to:
 - Evaluating individuals' ability to apply concepts and procedures in practical scenarios.
 - Presenting participants with real/simulated problems and assessing their solutions.
 - Encouraging questions and answer session.
 - Using quizzes, tests, or surveys to gauge participants' understanding of key concepts and principles.
 - Analyzing and discussing real-life cases where understanding of the topic is crucial to finding solutions or making decisions.
 - Engaging in hands-on tasks or simulations that require them to apply their knowledge and skills.
 - Allowing individuals to teach concepts to their peers, which not only demonstrates their understanding but also reinforces their own learning.
- Additional training will be provided as a component of the change management process related to modifications stemming from the alterations in identified hazards and procedures.
- To ensure employees performing are competent to do so, training will be delivered in a manner that ensures understandings, regardless of background, level of expertise, aptitudes, skillset, ability and willingness to deal with the hazards, risks and control measures.

Training Needs Analysis (TNA)

- Dolyn Construction Ltd. will evaluate the training requirements for each role, responsibility, and job task by assessing the necessary knowledge, skills, and competencies. This will be achieved by:
 - 1 Defining training needs, for roles/tasks by assessing knowledge, skills, and competencies required.
 - 2 Reviewing legislated and other training requirements utilizing the procedures outlined in Legal Requirements (LEG D1).
 - 3 Considering different levels of responsibilities, abilities, language skills, and literacy. This may involve tailoring training programs to meet the specific needs of various employee groups, ensuring inclusivity and effectiveness across the organization.
 - 4 Gathering information through surveys, interviews, observations, and performance evaluations to identify existing skills and knowledge levels, as well as areas where improvement is needed.
 - 5 Conducting a hazard and risk analysis and prioritize training needs based on exposure to risk and the likelihood of injury or illness.
 - 6 Developing a training plan that outlines required training, content, delivery mode, and resources required.

Mandatory Training Requirements:

- The organization will implement and maintain a list of mandatory training topics. Refer to Minimum Training Matrix - Orientation (TRA D4a). At a minimum, workers will receive training on:
 - Information on the company's OHSMS including purpose, roles, responsibilities and rights, importance of conformity, potential consequences for deviations or noncompliance and importance of workers' participation within the OHSMS.
 - Roles, responsibilities and rights.
 - The purpose of the OHSMS, and its respective elements.

- The importance of conformity to the OHS Policy, procedures and the OHSMS overall.
- Legal and other requirements, inclusive of potential consequences for deviations or noncompliance.
- Importance of worker, and worker representatives, participation within the OHSMS.
- Other requirement to ensure an employee is able to perform their work in a safe and healthy manner.
- Mandatory training will be provided during orientations, through formal course delivery or through one-on-one instruction and will be refreshed regularly through safety talks, H&S meetings or by any other means deemed effective by management.
- Training will be provided by a competent person either in person or virtually.
- Dolyn Construction Ltd. will compile a guideline of topics to be addressed during site-specific orientations. These will include essential site rules and requirements established by the supervisor. Emphasis will be placed on the compliance of legal obligations and consequences associated with non-compliance. Refer to Minimum Training Matrix - Site Orientations (TRA D4b).

Training on the OHSMS:

- Employees will be trained on the key elements of the organization's OHSMS, such as worker rights, policy development, hazard management, emergency procedures, and incident reporting.
- Training will highlight the importance of employee involvement in the OHSMS and OHS practices.
- Employees will gain an understanding of their roles and responsibilities within the OHSMS framework.
- Participants will be trained on the importance of ongoing evaluation and improvement of the OHSMS to adapt to changing workplace conditions and emerging risks.

Worker Participation:

- All employees will receive education on the purpose of the OHSMS and its role in maintaining OHS. Training will be delivered by a competent person through formal training sessions, safety talks or person-to-person.
- The organization believes that when workers actively participate in shaping training courses, they are more likely to comprehend and adhere to them.
- The organization will ensure that frontline employees, who are most familiar with the work environment, and worker representatives contribute their insights concerning training needs.
- Employ standardized monitoring and feedback mechanisms to determine whether participants found the training to meet both organizational standards and their individual needs.

Legal Requirements and Compliance:

- For the purpose of the Dolyn Construction Ltd. OHSMS, legal requirements will include all regulatory standards, industry guidelines, and the organization's policies related to OHS that must be complied with. Refer to Training Matrix - Legal Requirements (TRA D2).
- The organization will develop and enforce policies and procedures that align with legal requirements, outlining guidelines and procedures for employees to follow to ensure compliance.
- Failure to comply with these requirements may result in various consequences, including fines, penalties, legal action, and damage to the organization's reputation.
- Failure to comply may lead to increased risks of accidents, injuries, and illnesses among employees, as well as disruptions to workflow and productivity.
- Failure to comply may lead to disciplinary actions being taken against the employee(s) found to be non-compliant which could include warnings, retraining, or even termination of employment, depending on the severity of the violation and the organization's policies.

Timeframe:

- Employees will receive training, specific to the work tasks they will be required to performing, prior to the commencement of performing the work task. Training may be formal or on-site training delivered by a competent person through safety talks or person-to-person.

Competent Trainers:

- The organization will ensure that competent personnel, with the requisite knowledge, conduct in-house training, through rigorous selection, continuous evaluation, and certification processes.
- The organization will consistently assess the performance of in-house trainers and provide further training to ensure that trainer and the training materials remain up-to-date.
- When using third party trainers, the organization will only allow trainers from reputable organizations and may request references to assess the trainer's effectiveness.
- Trainers will be required to provide a course outline prior to procurement. The organization will establish clear expectations and requirements for the training.

Additional Training:

- The organization will provide additional training concerning any other requirements, as required, to ensure employees can work in a safe and healthy manner.
- The organization will ensure that, for third-party training courses, participants receive supplementary, organization-specific training whenever necessary such as PPE, emergency response training, specific hazard training such as working-at-heights, equipment operation training, and/or training updates.

Evaluation of Participant Learning:

- To assess worker comprehension, the organization may utilizes one or more of the following methodologies, tests or quizzes, observations, practice exercises, or peer assessment. Records of assessment will be recorded and retained.
- If a worker fails to implement principles learned, they may be required to repeat training. Until the worker is retrained, they will not be permitted to perform the work for which the training was provide.

Evaluation of Training Program:

- The organization will incorporate evaluation into the training process for continuous improvement and effectiveness. This may include pre-training assessments to identify knowledge gaps, formative assessments during training for real-time feedback, and post-training evaluations to gauge overall effectiveness and identify areas for improvement. Analysis of evaluation data will guide action plans and the continuous refinement of training programs to ensure they remain relevant and impactful.

Record of Training:

- The organization will ensure that for each training course delivered, either in-person or virtually, that the trainer provides the organization with a Record of Training (TRA F1a or TRA F1b) to include the name of the course, training dates, topics covered, attendees, trainers, and outcomes achieved.

Tracking Training Requirements:

- The organization will tracking training qualifications to ensure employees are compliant with regulatory standards, enhances employee competency and performance, and facilitates informed decision-making regarding skill development and resource allocation within the organization.

Training Records

- A competent person will ensure that accurate training records and orientation records, for all employees, are kept, updated and kept readily available.
- The organization's Training Record (TRA D5) spreadsheet will be the primary method use to track training delivery, status and to identify training needs. Training records will be updated after the delivery of training or at least annually.
- The Training Record will categorize similar roles such as management, office support staff, supervisors, and workers, as well as group related training requirements such as emergency training and specific work tasks.
- Copies of the training cards/certificates will be retained in each employee file dates of training will be recorded on the company training matrix to allow for ease of tracking.

Administration:

- Senior Management will designate a competent person to systematically monitor and record various aspects of training activities within the organization, such as attendance, completion status, performance outcomes, and any relevant metrics, to ensure compliance, assess effectiveness, and facilitate ongoing improvement of employee development initiatives.
- Training related documents will be retained for a minimum duration of the training record's validity or for five years, whichever is longer unless otherwise stipulated.
- For further information on documentation specific to this policy and procedure, the Document Control chart found at the end of each element.

Keeping A-Head of it All:

- "Keeping A-Head of it All," is a voluntary program by Dolyn Construction Ltd., that addresses training documentation with critical emergency data for healthcare providers in case of worker injury.
- Management, with worker approval and input, will compile medical and training information onto individual Worker Emergency Information/Training Qualification forms.
- Workers attach the form to the inside their hard hats using provided packing slip. These forms are maintained in worker personnel files, with annual reviews or updates whenever there are changes in medical or training qualifications.

Document Control:

- The following Documents and records are required for this policy and procedure, for audit purposes and for planning, implementation, control, evaluation and overall management of the OHSMS. Documents and records are maintained, reviewed, electronically filed and stored in personnel files, or with the applicable project files. Documents and records are retained for a minimum of five years.

Supporting Documents

Training, Competency and Orientation Policy and Procedure
Training Matrix - Legal Requirements
Competency Matrix
Minimum Training Matrix - Orientation
Minimum Training Matrix - Site Orientations
Training Record
Record of Training In-Person
Record of Training Virtual
Training Evaluation
Worker Orientation Package
Confirmation of Receipt and Understanding:

Communication Policy and Procedure

Objective

To establish clear channels and procedures for communicating OHS information throughout the organization. This includes ensuring timely and effective communication of hazards, procedures, training materials, and updates related to OHS to all relevant stakeholders.

Policy Statement

It is the policy of Dolyn Construction Ltd. to prioritize effective communication regarding OHS matters. We are committed to fostering an open and transparent environment where all workplace parties are informed, involved, and empowered to contribute to the continual improvement of our OHS practices.

Risk Assessment

The hazard of poor OHS communication lies in the increased risk of accidents, injuries, and hazards going unaddressed due to inadequate communication of vital safety information and failure to effectively engage with workers. The organization has assessed this risk as an "A" hazard.

Responsibilities

Senior Management will:

- Ensure the implementation of the OHS Management Lifecycle process, as outlined in our OHS Management Lifecycle document (LEA D5) when developing this policy, procedures, and processes to ensure all necessary considerations are addressed.
- Provide leadership and support for effective OHS communication.
- Allocate necessary resources for communication initiatives.
- Review and approve OHS communication materials and strategies.

Worker Representatives will:

- Facilitate communication between management and workers regarding OHS matters.
- Participate in the development and implementation of communication strategies.
- Act as advocates for OHS communication within their respective areas.

Managers and Supervisors will:

- Communicate OHS policies, procedures, and expectations to their workers.
- Encourage open discussion regarding OHS concerns and suggestions.
- Promptly report incidents, hazards, and risks to relevant personnel.

Employees will:

- Participate in OHS communication initiatives.
- Report hazards, incidents, and near misses promptly.
- Provide feedback and suggestions for improving OHS practices.

Procedures and Processes

Consistency and Accuracy:

- Create standardized templates for various types of OHS communications, such as incident reports, and regulatory compliance updates, ensuring consistency in format and content.
- Establish an OHS communication approval process, and ensure information is authorized prior to release to ensure adherence to organizational policies and to maintain accuracy.

- Establish clear guidelines and procedures outlining the preferred methods of communication, language standards, and response time expectations for interacting with external parties regarding OHS matters.
- Offer training sessions and resources to employees tasked with external communication, addressing effective communication techniques, confidentiality procedures, and compliance requirements.
- Establish feedback mechanisms for relevant parties to provide input on OHS communications, including surveys, feedback forms, or dedicated communication channels.
- Maintain records of all outgoing OHS communications, including dates, recipients, content, and any relevant responses or follow-up actions, to track the communication process and ensure accountability.
- Utilize multiple communication channels such as logs, emails, meetings, training records, and feedback tools to share OHS management system details, including policy, objectives, and progress.
- Ensure workplace parties know their roles in the Dolyn Construction Ltd. OHSMS upkeep. This will be achieved through training, job descriptions, handbooks, signed acknowledgments, or other effective methods as decided by Senior Management.

Communicating Information about the OHSMS, OHS Policy, and Implementation Progress:

- Senior Management will hold compulsory annual H&S meetings during work hours for all workers, office personnel, and Senior Management. Meetings will address OHSMS progress, and OHS issues, gather feedback, and include attendance tracking. Minutes will be documented using the H&S Meeting Minutes template (COM F1).
- Display posters, flyers, and other visual aids on bulletin boards in common areas to communicate OHSMS information, such as safety procedures, emergency contacts, and incident reporting procedures.
- Provide training sessions, orientations and/or toolbox talks focused on aspects of the OHSMS, such as hazard identification, risk assessment, safety procedures and progress on OHS initiatives.
- Ensure safety talks are conducted and documented (COM F2), at least weekly by a competent person, addressing relevant topics. Delivery methods should ensure understanding. Attendance will be kept.
- Introduce new hires to OHS policies and procedures through an orientation process, ensuring clear understanding and adherence to the organization's standards. Documentation of orientations will be maintained for record-keeping and compliance purposes.
- Supervisors will conduct site orientations for all personnel entering the worksite. The purpose of the orientation is to communicate relevant site OHS information. Records will be kept using the organization's Site Specific Orientation Checklist (COM F3). Refer to Minimum Communication Matrix - Site Orientation (COM D3).
- Safety committees will be established as necessary, to facilitate communication and collaboration on OHSMS-related matters.
- Mechanisms for employees' feedback, suggestions, or report safety concerns related to the Dolyn Construction Ltd. OHSMS and OHS Policy will be implemented.

Internal OHS Communication:

- Regular channels for communication among various levels and functions within the organization will be established such as including meetings, memos, emails, and safety talks. Records to be kept.
- Management will encourage and support worker participation by identifying and removing barriers to participation such as by cultivating an atmosphere of transparent communication, offering incentives to encourage involvement, scheduling meetings during standard work hours, and promptly addressing any concerns raised by workers. Refer to the Worker Participation Plan (WP D2).
- Provide training to enhance OHS literacy and communication skills among employees.

OHS Communication with External Stakeholders:

- Communicate OHS information with external stakeholders (e.g., contractors, suppliers, regulatory agencies), as necessary. Communication may include, meeting minutes, agreements, and reports.
- Ensure consistency and accuracy of OHS messages conveyed to external parties.
- Ensure approval by Senior Management or identified authorized person, before distribution.

Receiving, Documenting, and Responding to Communications:

- OHS communications received will be documented with pertinent details and responded to promptly with appropriate actions to address concerns or incidents effectively. Records will be kept and will be retained for a minimum of 5 years, for reference and compliance purposes.

Identifying and Resolving Communication Barriers:

- The organization will identify barriers to effective communication, such as ability, language skills, and literacy levels, and will take measures to overcome communication barriers, by providing information clearly and in terms that are easily understood, providing translated materials, offering training, or utilizing visual aids.

Reporting of Workplace Incidents, Hazards, and Risks:

- Employees will be instructed on their obligation to report workplace incidents, hazards, and potential risks immediately to their supervisor or designated OHS personnel, through orientation, OHS Meetings, or safety talks.

Ensuring OHS Input is Received and Considered:

- Ensure clear channels for OHS-related feedback, suggestions, and concerns to be submitted, such as designated email addresses, suggestion boxes, or regular meetings, and ensure feedback is reviewed and addressed promptly, acknowledge receipt and timely responses to communicate actions taken or further steps required.
- Documentation will be maintained to record worker input and management responses.

Consultation and Information Sharing with External Parties:

- Consult and inform affected external parties about pertinent OHS matters, such as changes in OHS policies, procedures, or activities, when appropriate.
- Report incidents to the MLITSD, WSIB, or other agencies, as required.
- Ensure worker privacy and confidentiality when communicating with external parties.
- Foster collaborative relationships with external stakeholders to promote shared responsibility for OHS.

Access to Information:

- Dolyn Construction Ltd. will ensure on-site safety binders contain pertinent information including legal and regulatory requirements, personal protective equipment (PPE) guidelines, Workplace Hazardous Materials Information System (WHMIS) procedures, and additional relevant details. At least annually, a competent person will review on-site binders to ensure the information is current.

Availability of Information:

- Ensure reports are readily accessible to H&S Representatives and the JHSC, covering a range of topics including, but not limited to:
 - Safety Data Sheets (SDS)
 - Accident/Incident Reports
 - Action Plans
 - Audit Summary Report
 - OHS Program
 - Emergency Response Plans (ERPs)
 - Workplace Inspections results
 - OHS Performance Reports

Safety Talks:

- Safety talks will advise workers of existing or potential dangers to their OHS during the upcoming work. When work crews exceed 5 workers, supervisors will document at least one safety talk delivered each week using the Safety Talks form (COM F2). Workers attending the safety talk will confirm receipt by signing off on the Safety Talk form.
- Safety Talks will identify the relevant safety hazards based on the current work activities or potential hazards and provide information on controlling identified hazards. They may include visual aids or demonstrations, to effectively convey key safety points. Safety talks will be delivered clearly and interactively, encouraging participation and addressing any questions or concerns to ensure understanding and compliance among the audience.

Record Retention:

- Records of commination will be stored electronically and retained for a minimum of 5 years. Records will be maintained as per the procedure outlined in the Document and Record Control (DCR D1).
- The creation, collection, retention and distribution of documents and records will comply with all applicable legal requirements, collective agreements and company policies, as appropriate.

Document Control

- The following Documents and records are required for this policy and procedure, for audit purposes and for planning, implementation, control, evaluation and overall management of the OHSMS. Documents and records are maintained, reviewed, electronically filed and stored in personnel files, or with the applicable project files. Documents and records are retained for a minimum of five years.

Supporting Documents

Communication Policy and Procedure

Communication Plan

Minimum Communication Matrix - Site Orientation

H&S Meeting Minutes

Safety Talk

Site Specific Orientation Checklist

Workplace Inspections Policy and Procedure

Objective

The objective of this Workplace Inspection Policy is to establish a systematic approach to identifying, correcting, and preventing non-conformities. It aims to ensure employee OHS by proactively addressing hazards, complying with regulations, and continuously improving our OHSMS.

Policy Statement

Senior Management is committed to ensuring that regular inspections are conducted to maintain a safe and compliant work environment. These inspections are designed to identify and mitigate hazards, promote employee well-being, and uphold regulatory standards

Scope

This policy applies to every employee across all levels within the organization.

Definitions

Conformity:

- To meet certain standards, specifications, or requirements set by a particular system, regulation, or expectation.

Responsibilities

Senior Management will:

- Provide the necessary resources, support, and leadership to ensure the effective implementation of this policy.
- Oversee the inspection process, review inspection findings, and ensure timely corrective and preventative actions are taken.
- Develop and implement organization rules policies that prioritize workplace safety and health.

Supervisors and Management will:

- Coordinate workplace inspections, conduct hazard assessments, identify non-conformities, and oversee the implementation of corrective and preventative actions.
- Ensure compliance with applicable laws and regulations.
- Where applicable, set site-specific rules for the health and safety of the workers.

Employees will:

- Actively participate in workplace inspections.
- Report hazards or non-conformities.
- Adhere to safety procedures and procedures.
- Work in compliance with both organization rules and site-specific rules, at all times.
- Cooperate with management to implement corrective and preventative actions.

Procedures

Workplace Inspections:

- Conducted and records kept by all workplace parties required to perform inspections at a frequency outlined in Workplace Inspection Matrix (WI D2).
- Inspectors will identify and will ensure that corrective actions are taken. Inspectors will also note the potential for non-conformities and recommend preventative actions are taken.
- Recorded on the specific forms developed for the purpose, or project report, if applicable).

- Inspector will be provided training relevant to what they will be required to perform inspections on. At a minimum, training will include:
 - The required frequency of inspection.
 - How to identify non-conformities and potential non-conformities.
 - How to implement controls using the hierarchy of controls.
 - How to correctly fill out inspection documents.
 - How to monitoring and follow-up of corrective actions taken.
 - Reporting requirements in the event of "A" ranked hazards.
 - The requirements on who, when and how to submit completed inspection results.

Pre-Use Inspections:

- Conducted by all workplace parties prior to use of the vehicle, machine, tool and equipment as determined by management or the supervisor.
- Inspectors will identify all non-conformities and corrective actions such as implementing the corrective action. If it is not possible to implement necessary corrective actions, the inspector will report to the supervisor, who will arrange for corrective actions to be taken.
- Recorded on the specific forms developed for the purpose.
- Inspector will be provided training relevant to what they will be required to perform inspections on. At a minimum, training will include all items outlined in 13.5.1.

Inspections Frequency:

- It will be the responsibility of the H&S Coordinator, or their delegate and supervisors to ensure that inspection are performed at the frequency specified in the Workplace Inspection Matrix (WI D2).

Inspection Required:

- Inspections will encompass facilities, job sites, emergency equipment, vehicles, designated tools and equipment, and personal protective equipment (PPE), including offices, workshops, parking lots, machinery, vehicles, tools, and emergency equipment.

Worker Participation:

- H&S representatives will conduct regular monthly workplace inspections.
- Employees will conduct regular pre-use inspections.
- Workers will have the opportunity to discuss their concerns or ideas, as part of the site inspection process.
- Site inspection results will be communicated to workers either through postings or safety talks.
- Site inspection results will be provided to the H&S representative and JHSC, as necessary.

Legislated and Manufacturer's Requirements:

- Requirements for inspection will be determined by:
 - Referencing legal requirements to include, but not be limited to, Occupational Health and Safety Act, R.S.O. 1990, c. O.1, Regulations for Construction Projects Reg. 213/91, First Aid Reg. 1101, and Industrial regulations Reg 851.
 - Consulting with the vehicle, machine, tool and equipment owner's manual to ensure that the requirements of the manufacturer will be met.
- Workplace inspection will comply with legislation, the OHS Act and its applicable regulations, other standards such as CSA standards related to the use and inspection of personal protective equipment, industry standards and manufacturer's requirements.

Identifying Non-Conformities:

- Ensure regular workplace inspections will be conducted by a competent person to identify non-conformities in various areas such as equipment, office, sites and shop/warehouse.
- Employee will be encouraged to report hazards, incidents, or deviations from standards and clear reporting channels will be established and the organization will foster a non-punitive reporting culture.
- Non-conformities will include personal as well as procedural, failure to meet regulatory or manufacturer's instructions.
- Regular maintenance for equipment can uncover non-conformities such as defects, deviations from specifications, or inconsistencies in product/service quality.
- Feedback from relevant workplace parties such as the constructor or the MLITSD.
- Incident investigations may uncover non-conformities or deviations from standards. These investigations delve deep into the root causes of incidents, shedding light on underlying issues that may compromise workplace safety, quality, or compliance.

Correcting Non-Conformities:

- A competent person will determine the underlying cause(s) of the non-conformity by analyzing all relevant factors, such as processes, procedures, equipment, human factors, and environmental conditions.
- Based on the conclusions, develop corrective actions that outline the specific steps to address the identified root cause(s). The corrective actions should include objectives, timelines, responsible parties, and resources needed for implementation.
- Implement the corrective actions.

Preventative Actions:

- Conduct regular risk assessments and hazard identification activities to proactively identify potential sources of non-conformities or risks to workplace safety, quality, or compliance.
- Introduce proactive controls and measures to mitigate or eliminate potential non-conformities before they occur. This may include updating procedures, enhancing training programs, or investing in new equipment or technology.

Unintended Consequences:

- To ensure that changes made as part of corrective actions or preventative actions (CAPA) do not inadvertently introduce new hazards or risks to the work environment, conduct an assessment on any changes. Identify potential hazards or risks associated with the proposed changes, considering factors such as equipment modifications, procedural adjustments, and environmental impacts.
- Seek the input of employees, relevant stakeholders and when necessary, safety professionals, in the decision-making process to identify potential hazards and develop mitigation strategies.

Tracking:

- Prioritize CAPAs based on their severity, potential impact, and urgency. Categorize actions according to their nature (corrective or preventative) and the area responsible for implementation.
- Assign responsibilities for each action to specific individuals or teams. Clearly communicate roles, expectations, and timelines to ensure accountability.
- Define specific objectives, tasks, resources required, timelines, and success criteria for implementation.
- Monitor the progress of CAPA implementation to ensure adherence to timelines and effectiveness. Provide guidance, support, and assistance as needed to overcome challenges or obstacles.
- Communicate regularly with employees, management, and relevant workplace parties, to provide updates on the status of CAPA.

Record Keeping:

- All corrective and preventative actions taken will be recorded using specific forms designed for the purpose such as workplace inspection reports, accident and incident reports, or hazard assessment forms.
- Clearly describe the specific steps or measures taken to address the issue or prevent its recurrence.
- Provide an analysis of the root causes that necessitated the action.
- Record the initiation and completion dates to track progress and effectiveness.
- Identify the individual or team accountable for implementing and completing the action.

Communication:

- The H&S Coordinator will ensure inspection reports are communicated to Senior Management and other relevant workplace parties. This may be achieved through safety talks, emails, newsletter entries, or by any other means deemed effective by Senior Management.
- The H&S Coordinator will ensure that all elements affected by implemented CAPAs are updated in the OHSMS to reflect current practices and procedures.
- Any revisions to the organization's procedures will be communicated promptly to all employees and all relevant workplace parties.

Review and Updates:

- The H&S Coordinator will ensure that all elements affected by implemented CAPAs are updated in the OHSMS to reflect current practices and procedures.
- Any revisions to organization's procedures will be communicated promptly to all employees and all relevant workplace parties.

Monitor and Review:

- Define the criteria that will measure the effectiveness of corrective and preventative actions.
- Track progress and gather data through inspections, interval checks, feedback or by any other means deemed to be effective.
- Evaluate OHS performance against the criteria to identify discrepancies or areas requiring improvement.

Document Control:

- The following Documents and records are required for this policy and procedure, for audit purposes and for planning, implementation, control, evaluation and overall management of the OHSMS. Documents and records will be reviewed, electronically filed and stored with the project where the inspection occurred, in individual supervisor files or in a designated Workplace Inspection file.

Supporting Documents

Workplace Inspections Policy and Procedure
Workplace Inspection Matrix
Supervisor Inspection
H&S Representative Inspection
Office Inspection
Warehouse/Shop Inspection
Vehicle Inspections
Fall Arrest System Inspection
Annual Fall Arrest System Inspection
EWP & Fall Arrest Inspection
Equipment Pre-Use Inspection
Utility Trailer Pre-Use Inspection

Incident Investigation Policy and Procedure

Objective

The objective of this procedure is to ensure adequate reporting and investigation of accidents and incidents so that we can develop controls to eliminate or controls the likelihood that the event will not be repeated.

Policy Statement

Senior Management is committed to ensuring that accidents and serious incidents are not repeated. We will establish a consistent means of recording incident investigation information and ensure comprehensive investigations into the root cause of accidents, incidents and near misses for the sole purpose of implementing controls to ensure there is not a recurrence of the same or similar accidents.

Definitions

Incident:

- An event that results in minimal injury to people and/or damage to the environment, equipment, property and/or material. An incident may require first aid but does not require treatment from a Health Care Provider.

Accident:

- An event that results in serious injury that requires medical treatment from a Health Care Provider or hospital stay, and/or serious damage to the environment, equipment, property and/or material.

Occupational Illness:

- A condition that results from exposure in a workplace to a physical, chemical or biological agent to the extent that the normal physiological mechanisms are affected and the health of the worker is impaired.

Near Miss:

- An event that under different circumstances could have resulted in physical harm to an individual or damage to the environment, equipment, property and /or material.

Critical Injury:

- Regulation 834 of the Occupational Health and Safety Act defines critical injury as follows:
- “Critically Injured” means an injury of a serious nature that;
 - Places life in jeopardy.
 - Produces unconsciousness.
 - Results in substantial loss of blood.
 - Involves the fracture of a leg or arm but not a finger or toe.
 - Consists of burns to a major portion of the body.
 - Causes the loss of sight in an eye.
 - Fracture or amputation of more than one finger or more than one toe.
 - Fracture of a wrist, hand, ankle or foot.

Workplace Harassment:

Workplace harassment means engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome.

Workplace Violence:

- The exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;
- An attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker;
- A statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Sexual Harassment:

- Sexual harassment means engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome.
- Making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Domestic Violence:

- Domestic Violence in the Workplace includes any person who has a relationship with a worker – such as a spouse, a former spouse, current or former intimate partner or family member – who may physically harm or attempt or threaten to physically harm a worker at work.

Workplace Bullying:

- The exercise of physical force (does not have to be related to a prohibited ground of discrimination, as defined in the Human Rights Code) by a person against a worker in a workplace that causes, or could cause, physical injury to the worker.
- An attempt to exercise physical force against a worker in a workplace that could cause physical injury to the worker.

Discrimination:

- Any conduct which constitutes discrimination under the Ontario Human Rights Code. This includes discrimination based upon race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, record of offences, marital status, family status, or disability as defined in the Ontario Human Rights Code.

Risk Assessment

Failing to have an incident investigation policy and procedure, poses risks like accidents, legal issues, reputation damage, and financial losses. Implementing one is crucial for fostering safety, preventing accidents, and safeguarding employees and the organization. . The risk is assessed as a "B" hazard.

Responsibilities**Management will:**

- Ensure that accident investigation procedures are established, communicated, and followed.
- Designate individuals or teams responsible for conducting accident investigations.
- Provide necessary resources and support for thorough investigations.
- Develop and communicate a workplace violence and harassment policy.
- Provide training and resources to prevent workplace violence and harassment.
- Investigate complaints of violence and harassment promptly and impartially.
- Take appropriate disciplinary action against perpetrators of violence and harassment.
- Provide support and assistance to victims of violence and harassment.

H&S Coordinator will:

- Lead or participate in accident investigations.
- Collect and analyze relevant information, including witness statements, evidence, and documentation.
- Identify root causes and contributing factors of accidents.
- Recommend corrective actions to prevent recurrence.
- Document investigation findings and share them with relevant stakeholders.
- Handle complaints of workplace violence and harassment in a confidential and sensitive manner.
- Provide support to victims and perpetrators as needed, including counseling and mediation services.
- Maintain records of complaints, investigations, and outcomes.

Supervisors will:

- Promptly report accidents or incidents to the appropriate personnel.
- Cooperate with accident investigators and provide necessary support and information.
- Implement corrective actions recommended by investigators.
- Monitor and follow up on the effectiveness of corrective actions.
- Promote a respectful and inclusive work environment free from violence and harassment.
- Respond promptly and appropriately to reports or observations of violence and harassment.
- Support victims of violence and harassment and facilitate their access to resources and assistance.
- Enforce policies and procedures related to workplace violence and harassment.

Employees will:

- Report accidents, near misses, and hazardous conditions to supervisors or safety officers.
- Cooperate with accident investigations by providing accurate and timely information.
- Participate in safety training and follow established safety procedures.
- Report incidents or concerns related to violence and harassment to supervisors, managers, or HR.
- Cooperate with investigations into allegations of workplace violence and harassment.
- Participate in training programs to prevent and respond to workplace violence and harassment.

Procedures

Notification and Reporting:

- Incidents, accidents, near misses and acts of violence and/or harassment, property damages, and environmental releases are to be reported immediately to supervisors or H&S Coordinator, either orally or in writing.
- The organization will report, as required to the MLITSD and WSIB. For full details refer to the organization's Legal Requirements for Reporting (II D2).

Investigations:

- Investigation will take place promptly after an occurrence, and will be conducted by trained personnel as designated by the organization, such as the H&S coordinator, supervisors, or a dedicated investigation team. Investigators will be tasked with identifying root causes, implementing corrective measures that will prevent recurrence.
- Accident investigators will receive training on how to effectively conduct thorough investigations, evidence collection techniques, interviewing skills, root cause analysis methodologies and on relevant regulations and organization specific reporting requirements.

Accident, Incident and Vehicle Accident Investigation Procedures:

- Ensure the immediate safety of individuals involved, this may involve activating 911, and secure the accident scene to prevent further harm or disturbance of evidence.
- Minimize adverse effects post-incident by proactively addressing secondary impacts and preventing escalation. Immediate assessment determines damage extent and secondary consequences like environmental contamination or structural instability. Implement containment measures, collaborate with stakeholders, and mobilize resources to effectively manage the incident.
- Promptly report the accident to Senior Management and other relevant authorities, such as emergency services, the constructor, or MLITSD, depending on legislated requirements and nature of the incident.
- Senior Management may choose to assemble an investigation team that may consist of the supervisor, the injured worker(s), if possible, the H&S Representative or JHSC member, a third party investigator and any other person deemed by Senior Management to be a valuable asset to the team.
- Collect information, including witness statements, photographs, videos, and physical evidence from the accident scene. Document the time, date, and location of the incident and all other aspects of the incidents using the appropriate form for the type of incident. (II F1, F6, F7, F8).
- Interview witnesses to gather their firsthand accounts of what happened. Ask open-ended questions to gather as much detail as possible.
- Analyze the information to identify the root causes and contributing factors of the accident. Consider people, equipment, materials, environment, procedures and processes.
- Document the investigation findings, including a detailed description of the accident, the sequence of events, contributing factors, and identified root causes. Maintain accurate records of all documentation.
- Based on the investigation findings, recommend and document (II F2) corrective actions and preventative actions (CAPAs) to prevent similar accidents in the future. Ensure that CAPAs are effective, and prioritized based on risk.
- Communicate the CAPAs to Senior Management and other relevant stakeholders, supervisors, and employees. Assign responsibility for implementing each CAPA and establish a timeline for completion.
- Follow up on the implementation of CAPAs to ensure they are effectively implemented and address the identified root causes. Monitor the effectiveness of the actions over time and make adjustments as necessary. This may involve tracking safety-related KPIs such as accident rates or near-miss occurrences, before and after implementation, conduct audits, and gather employee feedback to assess the impact of corrective and preventative actions.
- Conduct a review of the accident investigation process to identify any areas for improvement. Update the procedure as needed to incorporate lessons learned and improve future accident investigations.
- When required by regulations, report the incident to the MLITSD utilizing the MLITSD Notice of Occurrence form (II F4).
- The organization will communicate investigation findings and corrective actions to pertinent stakeholders via safety talks (II F3), encompassing root causes and CAPAs, to enable the implementation of essential adjustments in work processes. Additionally, effective communication will cultivate transparency, foster trust, underscore the organization's commitment to safety and improvement, and ensure that all involved parties are thoroughly informed and engaged in resolving the issue.

Violence and Harassment Incident Investigation Procedures:

- Immediately begin the investigation process by assigning trained investigators, collecting evidence, conducting interviews, and documenting findings in a timely and confidential manner.
- Document all incident-related information utilizing the Violence and Harassment Report (II F8).
- Implement regular training programs to raise awareness of workplace violence and harassment, educating employees on their rights and responsibilities and promoting a culture of respect and inclusivity.

- Specify potential disciplinary actions for perpetrators of violence and harassment, ensuring that consequences are proportional to the severity of the behavior and consistent with organizational policies and legal requirements.
- Implement preventative measures to mitigate the risk of workplace violence and harassment, such as establishing clear expectations for behavior, providing conflict resolution training, and promoting bystander intervention.
- Conduct regular reviews of the violence and harassment procedure to identify areas for improvement, incorporating feedback from employees, monitoring trends in incident reports, and updating policies and training as necessary to ensure effectiveness and compliance.
- Employees have always had the right (and responsibility) to decline tasks that may pose risks to themselves or others, including situations involving workplace violence. However, an amendment to Section 43 of the OHSA explicitly incorporates the right to refuse work if there is a foreseeable risk of workplace violence jeopardizing the safety of the worker.

Record Retention:

- The H&S coordinator will oversee the administration of incident documentation and will ensure accurate and timely recording of incident related analysis, reporting and corrective actions.
- Records of accident investigations and related documents will be stored electronically and will be retained indefinitely. Records will be maintained as per the procedure outlined in the Document and Record Control.
- The creation, collection, retention and distribution of documents and records will comply with all applicable legal requirements, collective agreements and company policies, as appropriate.

Document Control:

- The following Documents and records are required for this policy and procedure, for audit purposes and for planning, implementation, control, evaluation and overall management of the OHSMS. Documents and records are maintained, reviewed, electronically filed and stored in personnel files, or with the applicable project files. Documents and records are retained for a minimum of five years.

Supporting Documents

Incident Investigation Policy and Procedure

Legal Requirements for Reporting

Accident Investigation

Incident Log

Vehicle Accident Report

Incident/Near Miss Report

Violence and Harassment Report

Emergency Preparedness Policy and Procedure

Objective

Our objective is to develop and implement comprehensive emergency preparedness procedures to ensure the safety and well-being of our employees, minimizing the impact of potential crises through proactive planning and swift response measures.

Policy Statement

Senior Management is committed to establishing clear guidelines and procedures for effectively managing emergencies, prioritizing the protection of lives, property, and the environment. Through continuous training, evaluation, and improvement, we strive to maintain readiness to respond promptly and efficiently to any emergency situation.

Risk Assessment

Failing to have an emergency preparedness policy and procedures, heightens the risks of chaos, confusion, and increased vulnerability during emergency situations, potentially leading to loss of life, property damage, and significant disruption of operations. The organization has assessed this risk as an "A" hazard.

Responsibilities

Senior Management will:

- Provide leadership, commitment, and resources for emergency preparedness efforts.
- Establish emergency response objectives and ensure policy compliance.
- Allocate the necessary financial, human, and technological resources to support emergency situations.
- Communicates clear expectations for emergency preparedness and hold managers, supervisors, and employees accountable.

Supervisors will:

- Implement and enforce emergency preparedness procedures within their areas of responsibility.
- Provide training and guidance to workers on emergency procedures.

Health & Safety Coordinator will:

- Develop and maintain the emergency preparedness policy and procedures.
- Coordinate emergency drills, exercises, and training programs.

Worker Representatives will:

- Advocate for worker safety and participation in emergency preparedness activities.
- Communicate worker concerns and feedback regarding emergency procedures.

Workers will:

- Familiarize themselves with emergency procedures and protocols.
- Report hazards and participate in emergency drills and training.

First Aiders will:

- Provide immediate medical assistance in case of injuries or medical emergencies.
- Assist in evacuations and communicate with emergency services.
- Adhere to the emergency preparedness policy and procedures established by the primary organization.
- Participate in joint emergency drills and coordination efforts as required.

Visitors will:

- Be aware of site-specific emergency procedures and follow them when required.
- Be aware of the designated assembly point and evacuation routes for follow in case of emergency.

Procedures

Identification of Potential Emergency Situations:

- Develop a data bank of potential emergency situations, hazards, controls and potential emergency procedures. Refer to Emergency Action Plan (EP D2).
- Schedule periodic risk assessment sessions, involving relevant stakeholders from different departments or teams, to collectively identify potential emergency scenarios.
- Utilize historical data, incident reports, and industry-specific risk analysis tools to evaluate the likelihood and impact of identified emergencies.
- Conduct on-site inspections and walkthroughs to assess physical hazards, structural vulnerabilities, and environmental risks that could trigger emergencies.
- Document findings and prioritize risks based on severity and likelihood, informing the development of targeted mitigation strategies and emergency response plans.

Mitigating Consequences:

- Conduct thorough risk assessments to identify potential hazards and vulnerabilities within the organization.
- Collaborate with relevant stakeholders to develop and implement effective safety procedures and preventive measures.
- Provide comprehensive training and awareness programs to educate employees on safety procedures and promote a culture of proactive risk management.
- Regularly review and update procedures based on emerging threats, technological advancements, and lessons learned from incidents or near misses. Refer to Emergency Preparedness Review (EP F4).

Resources:

- Assess the needs of prevention procedures and response plans by identifying essential resources such as personnel, equipment, supplies, and infrastructure.
- Coordinate with relevant stakeholders to ensure alignment of resources and procedures with response capabilities and procedures.

Emergency Equipment:

- Conduct a thorough inventory of required emergency equipment, including communication systems, and ensure their availability in designated locations throughout the facility. When determining necessary emergency equipment, consider:
 - First Aid Kits
 - Fire Extinguishers
 - Eyewash Stations
 - Cell Phones
 - Signage and Evacuation Maps
 - Emergency Lighting
 - Portable Generators
 - Communication Systems (radios, fog horn, whistles)
 - Automated External Defibrillators (AEDs)
 - Appropriate PPE
 - Fall Protection Equipment
 - Lockout/Tagout Devices
 - Spill Containment Kits
 - Traffic Control Devices (e.g., cones, barricades)
- A competent person will clearly mark the locations of emergency equipment, with prominent signage to facilitate quick access during emergencies, for all work locations.
- Provide training to designated personnel on the proper use and maintenance of emergency equipment, including communication systems.

- Establish procedures for reporting any malfunctions or deficiencies in emergency equipment and promptly address them to maintain readiness for response.
- Supervisors will ensure emergency equipment is regularly inspected by a competent person, following manufacturer's guidelines and legal requirements. Deficiencies will prompt replacement or restocking according to regulations or manufacturer's instructions. Inspection frequency will follow the provided chart.

What	Who	When	Documentation
First aid kits	Super	Weekly	Site Inspection
	H&S Rep	Monthly	Site Inspection
Fire extinguishers within Underwriters' Laboratories of Canada rating of at least 4A40BC.	Super	Weekly	Site Inspection
	Supervisor	Monthly	FE Tag
	H&S Rep	Monthly	Site Inspection
	3rd party	Annually	Certificate/Invoice
Eye wash station	Super	Weekly	Site Inspection
	H&S Rep	Monthly	Site Inspection
Stretchers and blankets if applicable	Super	Weekly	Site Inspection
AEDs	Super	Weekly	Site Inspection
Fall arrest rescue equipment	Comp. person	Annually	Site Inspection
Spill Kits	Super	Weekly	Site Inspection
Emergency vehicle kit, if applicable	Operator	Daily	Vehicle Inspection
Communication system i.e. phones, walkey talkey etc.	Super	Weekly	Site Inspection

Emergency Communication System:

- Prior to the commencement of a project, the supervisor will ensure there are multi-channel communication systems in place capable of reaching all workers, such as mobile phones, two-way radios, fog horns, and whistles.

Emergency Response Plans (ERPs):

- Assign a competent person or team comprised of individuals with expertise in relevant fields such as safety, security, medical, and facilities management to develop ERPs.
- Gather best practices, regulations, and industry standards specific to each type of emergency.
- When necessary, collaborate with external experts, emergency services, and local authorities to ensure alignment and integration of response plans with available resources and procedures.
- Establish a centralized location equipped with a communication equipment and staffed by trained personnel to coordinate emergency response efforts. Ensure the location is easily accessible and well-equipped to manage emergencies.
- At a minimum, ERPs will include:
 - Roles and responsibilities of relevant employees during emergency situations.
 - Emergency equipment requirements.
 - Training requirements.
 - All possible emergencies, consequences, required actions, procedures, and the resources available.

- Regularly review and update emergency response plans based on changes in organizational structure, facilities, regulations, and lessons learned from drills, exercises, and real-life incidents.
- Project managers and supervisors are to ensure that documented response plans for all potential emergency situations, are developed prior to the commencement of work on a project.
- The supervisors will communicate the plan and assign responsibility to individuals.
- Workers are expected to adhere to the plan and specific responsibilities and fulfill their roles.

Communication:

Emergency prevention procedures and response plans will be communicated to all involved/relevant people using one or more of the following methods:

- When appropriate, the company will notify emergency response services, government authorities, and the community about emergencies. A competent person will be assigned as the Emergency Response Liaison to handle communications with these parties, including the community and media if necessary.
- The supervisor will assign specific roles and responsibilities concerning emergency situation to individuals and will ensure that specific procedures for each role, are clearly explained.
- The supervisor will ensure everyone entering the worksite is informed about emergency procedures, communication systems, emergency personnel, emergency equipment locations, and muster station.
- When requested, copy of the organization's ERP will be provided to the general contractor prior to the commencement of work.

Posting:

- The following items will be posted on the project OHS Bulletin Board or, on short term duration projects, will be located in the On-site OHS Binder:
 - Form 82 WSIB poster.
 - Valid First Aid Certificates – photocopies.
 - Emergency Response Plan.
 - Emergency phone numbers will include:

• Ambulance	• Fire	• Poison Control	• Ministry of Labour, Immigration, Training and Skills Development, Immigration Training & Skills Development
• Enbridge Gas	• Police	• Bell Canada	
• Hydro	• Organization emergency numbers		

Training:

- Identify individuals who have duties or responsibilities within the emergency procedures or plans.
- Provide training programs that address the specific roles and responsibilities of these individuals during emergencies such CPR and as how to use a fire extinguisher, an AED and communication equipment.
- Ensure that training sessions cover relevant procedures, procedures, and communication channels related to their assigned duties.
- Provide opportunities for hands-on practice and simulations to reinforce learning and familiarize individuals with their roles in real-life emergency scenarios.
- Regularly review and update training materials to incorporate changes in procedures, personnel, or regulatory requirements, and ensure ongoing competency among individuals with assigned duties.

Testing and Drills:

- Schedule regular tests or drills targeting identified emergency scenarios to assess the effectiveness of response procedures and personnel readiness.
- Document the outcomes of tests or drills, including observations, lessons learned, and areas for improvement, to inform future training and preparedness efforts. Forms (EP F a - c).
- Coordinate drills and tests at planned intervals to minimize disruption to regular operations and ensure that they are conducted safely, with precautions taken to prevent the introduction of additional hazards.

First Aid:

- It is the responsibility of the supervisor to ensure First Aid kits are located within quick and easy access for all workers. The location of first aid kits and the minimum number required per location will be determined by referencing Regulation 1101 based and on workforce size and risk factors.
- First Aid kits will be manned by qualified first aiders. Refer to section 9.5.13.
- It is the responsibility of the supervisor, or the person in charge of the first aid kit, to inspect and restocked to its original contents at least four times a year. Records of the date of inspection and name of the inspector will be logged and kept within the first aid kit. Reference Regulation 1101 section 6.
- First Aid Kits must be equipped with a Treatment Log.
- Workers needing medical treatment will receive a Medical Treatment Package (EP F3), to be completed by both the treating doctor and the injured worker. Completed packages must be returned to the supervisor, H&S coordinator, or office staff member by the next working day. For further details, refer to the Documents, Records, and Forms section of this procedure.
- The first aider or other person rendering first aid, will record treatment given, using the Treatment Record form (EP F2).

Qualified First Aiders:

- A trained First Aider will:
 - Complete a first aid training course delivered by a recognized first aid training provider.
 - Hold a valid First Aid Certificate;
 - Be introduced to new employees;
 - Work in close proximity to First Aid Stations;
 - Keep accurate records.
- Periodically, but at least annually, the H&S Coordinator, or their delegate, will review first aid training records to ensure first aiders have adequate and current training.
- Project managers or supervisors will identify the first aider assigned to a project as part of the Emergency Response Plan Assessment process. Qualified first aiders will be trained and available on site in compliance with Regulation 1101.
- Workers will report to the qualified first aider on site, any and all injuries, requiring treatment.
- Copies of First Aid certification will be included in the on-site safety binder.
- Copies of First Aid certification will be posted on each project.

Transportation of an Injured Worker:

Management is responsible for the transportation to medical facilities of any worker who is injured or made ill while working on a jobsite. It will be the responsibility of the first aider to determine:

- A medical facility could encompass the hospital or another institution where the injured worker is to undergo treatment administered by a healthcare provider.
- A medical facility could encompass the hospital or another institution where the injured worker is to undergo treatment administered by a healthcare provider.

- Suitable means of transportation based on the severity of the injury or illness, distance to medical facilities, urgency, potential risks during transport and availability of resources.
- Suitable means of transportation may include an ambulance, taxi, or co-workers vehicle. Under no condition will an employee be transported by an unknown person.
- All costs associated with transportation will be covered by the employer.
- The supervisor will have the exclusive authority to determine, based on factors such as the severity of the injury or illness, proximity to medical facilities, and resource availability, whether a worker should drive or accompany the injured individual to the medical facility, or follow them there.

Fire Extinguishers:

- Fire extinguishers, of a suitable type and size to permit the evacuation of workers during a fire, will be provided as per the Regulation for Construction Projects 213/91 sections 52 - 55. Refer to the Emergency Action Plan (EP D2) for more details.
- Fire extinguishing equipment will be of a suitable type and size to permit the evacuation of workers during a fire, will be identified to all new workers on a worksite, and will be located within quick and easy access for workers in the workplace.

Fire Extinguisher Inspection:

- Fire extinguishers will be routinely inspected for defects or deterioration as part of the supervisors weekly site inspection. Results will be documented on the inspection form. In the event that the fire extinguisher indicates it is NOT charged immediately remove it from service and replace with a fully functioning fire extinguisher.
- Monthly inspections will be conducted by a competent person and will be recorded on the inspection tag provided with the fire extinguisher.
- After a fire extinguisher is used, it will be recharged or replaced immediately.
- A third party technician will perform annual inspections and maintenance for all fire extinguishers owned by the organization. Records of the date of inspection and name of the inspector will be retained for a minimum of 5 years.
- As a result of inspection, if the fire extinguisher indicates it is NOT charged i.e. the needle is not in the green, it will be immediately tagged, removed from service and replaced.

Eye Wash Stations:

- Eye wash stations/bottles will be provided as required.
- Eye wash stations/bottles will be located in the vicinity of the first aid kit.
- Supervisor will ensure eye wash stations/bottles are inspected regularly.
- Eye wash bottles will be filled with saline and will be protected by a secure lid.
- All workers will immediately flush the eye as directed.

Evaluation and Review

A competent person will review emergency procedures and response plans as necessary, but at least annually, and will make revisions as necessary to ensure their effectiveness and alignment with changing conditions or requirements. To achieve this, the company will ensure:

- The review process will ensure that changes in regulations, industry standards, or site conditions are reflected in emergency procedures and response plans. This may include considering factors such as new hazards, updated contact information, or changes in personnel responsibilities.
- Employees will be provided with training on the updated emergency procedures and response plans to ensure they understand their roles and responsibilities in the event of an emergency. This may be achieved through safety talks, conducting drills or simulations to practice the new procedures.
- Detailed records of the annual review process, including meeting minutes, revision history, and documentation of employee training, will be kept.

Document Control:

- The following Documents and records are required for this policy and procedure, for audit purposes and for planning, implementation, control, evaluation and overall management of the OHSMS. Documents and records are maintained, reviewed, electronically filed and stored in personnel files, or with the applicable project files. Documents and records are retained for a minimum of five years.

Supporting Documents

Emergency Preparedness Policy and Procedure

Emergency Action Plan

First Aid Kit Inspection Log

First Aid Treatment Log

Medical Treatment Package

Emergency Preparedness Review

Fall Arrest Rescue Plan

Legal Requirements Policy and Procedure

Objective

The objective of this policy and procedure is to ensure compliance with relevant OHS laws, regulations, and standards to protect the health, safety, and well-being of employees, visitors, and the public, while also minimizing legal risks and liabilities for the organization.

Policy Statement

Dolyn Construction Ltd. is committed to complying with all applicable legislative and other requirements related to OHS. We will identify, document, implement, and monitor compliance with these requirements to ensure the safety and well-being of our employees, contractors, and stakeholders.

Risk Assessment

Failing to identify and comply with legal requirements and other standards, can expose the organization to legal non-compliance risks, including fines, penalties, and legal actions, while also increasing the likelihood of workplace accidents, injuries, and illnesses due to a lack of clear guidance and adherence to regulatory standards. The organization has assessed this risk as an "A" hazard.

Definitions

Relevant Legislation:

- Laws, regulations, and standards that apply to an organization based on its location, industry, and activities.

Responsibilities

Senior Management will:

- Ensure the implementation of the OHS Management Lifecycle process, as outlined in our OHS Management Lifecycle document (LEA D5) when developing this policy, procedures, processes to ensure all necessary considerations are addressed.
- Allocate adequate resources to fulfill these requirements.
- Regularly review and update procedures to ensure ongoing compliance.

H&S Coordinator will:

- Oversee the implementation and monitoring of compliance with legislative and other requirements.
- Coordinate efforts to identify, document, and communicate relevant legal and other requirements to appropriate personnel.
- Ensure that compliance evaluations are conducted regularly and documented.

Employees will:

- Be responsible for familiarizing themselves with relevant legislative and other requirements related to their roles and responsibilities.
- Adhere to these requirements and report any concerns or potential violations to their supervisors or the H&S Coordinator.

H&S Consultants will:

- Notify the organization of changes in legal requirements.
- Ensure the changes are incorporated into the Dolyn Construction Ltd. OHS program.

Procedures

Identification of Relevant Legislation:

- The organization will establish and maintain a record of legal obligations and other requirements to which it subscribes. Refer to the organization's Legislation and Other Requirements (LEG D2).
- Thoroughly review the relevant legislation to understand the specific requirements that apply to the organization. This may involve reading regulations, industry standards, and guidance documents.
- At least annually, or as required, the Health and Safety Coordinator will oversee a thorough review of legislation, regulations, codes, and standards pertinent to the organization's industry and activities by referencing government websites, industry literature, legal repositories, and professional associations. Changes will be documented, implemented and communicated to relevant employees. (LEG F3).

Currency:

- To ensure ongoing compliance, a competent person will review and update the documentation of legal and other requirements. Reviews will be conducted at least annually.
- Additions and revisions will be promptly integrated and effectively communicated to all stakeholders within the workplace, ensuring alignment with evolving regulatory requirements.
- Results of the review will be documented using the Legislation Compliance Checklist (LEG F3).

Evaluation of Compliance:

- The organization will designate a competent person to be responsible for overseeing the evaluation process.
- Compliance assessments will be carried out at minimum annually, or as deemed necessary, accounting for factors such as regulatory deadlines, organizational priorities, and risk evaluations. Records of compliance evaluations and action items will be documented and retained for a minimum of 5 years.
- A gap analysis will be conducted, as outlined in the organization's Management Review (MR D1), to compare current practices, policies, and procedures against the requirements outlined in legislation.
- Implement measures to address any gaps identified during the gap analysis. This could involve updating policies and procedures, training staff, implementing new technologies, or making changes to the organization's operations.
- Completed records of compliance evaluations will be communicated to Senior Management, worker representative and other relevant workplace parties.

Posting and Availability of Relevant Legislation:

- Employees will have access to relevant legislation for reference and clarification.
- Relevant legislation will be visibly posted or made available at each workplace as required.
- Copies of current legislation and other applicable requirements will be available to employees in QR code format and will be found in section 1 of all on-site H&S binders.
- At least annually, inspections will be conducted to verify the presence and currency of required information on bulletin boards and in on-site OHS binders. The outcomes of these checks will be documented using the organization's Health and Safety Bulletin Board Checklist (LEG F2).

Documentation:

- Documentation of all relevant legislative requirements, including statutes, regulations, codes, and standards applicable to OHS, will be kept.
- Accurate records of compliance evaluations, including documentation of assessments, findings, corrective actions, and ongoing monitoring activities, will be kept.
- Information will be documented using dedicated forms tailored for this function.
- Records shall be preserved for at least five years or for the duration mandated to demonstrate compliance with legal and other requirements. As per the organizations Documents and Records policy (DCR F1).

Document Control:

- The following Documents and records are required for this policy and procedure, for audit purposes and for planning, implementation, control, evaluation and overall management of the OHSMS. Documents and records are maintained, reviewed, electronically filed and stored in personnel files, or with the applicable project files. Documents and records are retained for a minimum of five years.

Supporting Documents

Legislation Requirements Policy and Procedure

Legislation and Other Requirements

Legal Requirements - QR Codes

H&S Bulletin Board Checklist

Return to Work (RTW) Policy and Procedure

Objective

The objective of our Return to Work Policy and Program for injured workers is to facilitate a safe and efficient transition back to the workplace following an injury. We aim to support the physical and emotional well-being of our employees while minimizing the impact of workplace injuries on productivity and morale.

Policy Statement

Senior Management is committed to providing a supportive environment for injured workers returning to work. We recognize the importance of early intervention, rehabilitation, and accommodation to facilitate a successful return to the workplace. This policy outlines our commitment to providing reasonable accommodations, support, and resources to injured workers as they reintegrate into their roles.

Definitions

Modified Work:

The modification of an employee's work tasks that allows for the worker to carry out the work assignment within the worker's capabilities.

Legal Requirements:

- WSIA Part V Section 40 (1) 2,2, Section 40 (3)

Risk Assessment:

Failing to have a comprehensive return to work policy and program for injured workers, Dolyn Construction Ltd. risks extended absences and decreased productivity among staff, along with potential legal and financial liabilities and negative impacts on employee morale and engagement. The organization has assessed this risk as an "A" hazard.

Responsibilities

Management will:

- Implement the OHS Management Lifecycle process, as outlined in our OHS Management Lifecycle document (LEA D5) when developing this policy, procedures, processes to ensure all necessary considerations are addressed.
- Provide oversight and strategic direction for the Return to Work (RTW) program, ensuring alignment with organizational goals and objectives.
- Allocate necessary resources, including budgetary support and staffing, to effectively implement and sustain the RTW program.
- Ensure compliance with legal requirements and industry best practices.
- Foster a culture of support for injured workers by providing visible leadership, communicating the importance of RTW initiatives, and promoting employee participation.

RTW Coordinator will:

- Oversee the implementation of the Return to Work Program, providing guidance and support to managers and injured workers throughout the process.
- Maintain regular contact with injured workers.
- Keep accurate records of all documents, reports, communications, evaluations and any other information specific to a RTW Plan.

Worker Representatives will:

- Actively participate in their rehabilitation and RTW plan, communicate openly with their supervisor and the H&S Coordinator., and adhere to any accommodations or adjustments outlined in their plan.
- Adhere to any accommodations or adjustments outlined in their plan.
- Report any problems related to the RTW Plan to the H&S Coordinator immediately.

Health Care Provider will:

- Provide up to date medical information.
- Fill in forms as requested.
- Act as a resource.

Workplace Safety and Insurance Board (WSIB) will:

- Process a claim on a timely basis.
- Act as a resource.
- Follow the WSIA.

Procedures**Reporting and Documentation:**

- Establish clear procedures for employees to report workplace injuries or illnesses promptly to their supervisor or designated safety personnel.
- Ensure proper documentation of all reported incidents, including injury details, witness statements (if applicable), and medical reports.
- Ensure confidentiality of injury/illness reports and assure employees they will not face retaliation for reporting incidents. Encourage an open-door policy so employees will discuss safety concerns.

RTW Offer:

- Immediately offer modified or transitional work tasks that will help an injured employees to gradually resume their work responsibilities while still accommodating any physical limitations they may have during their recovery process. Record details of the offer using the RTW Offer form (RTW F2).

Medical Evaluation:

- Conduct an initial assessment of the reported injury or illness to determine its severity and potential impact on the employee's ability to work.
- Arrange for a thorough medical evaluation by a qualified healthcare professional to assess the employee's condition, provide treatment as necessary, and determine their fitness to return to work.

RTW Plans:

- Collaborate with the injured employee, their healthcare provider, and relevant stakeholders to develop a personalized RTW plan.
- Document all aspects of the plan using the RTW Agreement form (RTW F3). Both the injured worker and the plan coordinator must sign off on the agreement.

Accommodation and Support:

- Provide reasonable accommodations to facilitate the employee's safe and successful return to work, such as modified work duties, adjusted work hours, ergonomic equipment, or temporary light-duty assignments.
- Assign a designated RTW coordinator or point of contact to provide guidance, support, and ongoing communication throughout the RTW process.

Communication and Training:

- Communicate, at least weekly, with the injured employee, their supervisor, and relevant team members about the RTW plan, including expectations, accommodations, and support available.
- Document all communications related to the RTW case using the RTW Contact Log (RTW F1).
- Provide training and awareness programs for managers, supervisors, and employees on the importance of RTW initiatives, recognizing signs of potential workplace hazards, and promoting a culture of safety and support.

Progress Monitoring and Follow-Up:

- Injured workers will keep a weekly journal (RTW F4) of their work activities including any issues they have. These issues will be resolved with the resolutions documented on the journal.
- Regularly monitor the injured employee's progress in accordance with the RTW plan, adjusting accommodations or work duties as needed based on their recovery status.
- Conduct periodic follow-up meetings with the injured employee, their supervisor, and healthcare provider to assess their ongoing needs, address any concerns or challenges, and ensure a smooth transition back to full-duty work.

Evaluations:

- At the completion of the RTW plan, an evaluation will be required. Evaluation will be documented (RTW F5) and will require input from the injured worker, the plan coordinator, the worker's supervisor(s), and by management.
- Following the assessment outcomes, potential improvement areas within the Return to Work (RTW) process may be pinpointed. These actionable areas will be documented and incorporated into the organization's overarching action plan for implementation.

Documentation and Recordkeeping:

- Maintain accurate and detailed records of all RTW-related activities, including injury reports, medical evaluations, RTW plans, accommodations provided, and communication logs.
- Ensure compliance with legal and regulatory requirements regarding confidentiality, privacy, and record retention related to RTW documentation.

Exit Criteria:

- Workers participating in an ESRTW Plan will exit from the plan when:
 - The worker returns to their regular job at full capacity;
 - The worker returns to full functional capacity supported by functional ability information;
 - The organization is unable to identify suitable, available work;
 - The worker is permanently placed in alternative work.

Document Control:

- The following Documents and records are required for this policy and procedure, for audit purposes and for planning, implementation, control, evaluation and overall management of the OHSMS. Documents and records are maintained, reviewed, electronically filed and stored in personnel files, or with the applicable project files. Documents and records are retained for a minimum of five years.

Supporting Documents

Return to Work (RTW) Policy and Procedure

RTW Contact Log

Return to Work Offer

RTW Agreement

RTW Worker's Journal

RTW Evaluation Form