# Occupational Health and Safety Policy

**July - 2018** 

David J. Scott, Ph.D.

**President** 





### **POLICY STATEMENT**

Polar Knowledge Canada (POLAR) is committed to providing a healthy and safe working environment for all its employees, regardless of tenure or status; promoting occupational health and safety (OHS) as an integral part of its corporate culture; and, integrating OHS into its management and business decision-making processes.

#### LEGISLATED REQUIREMENTS

As a federal agency, POLAR is subject to the provisions of the <u>Canada Labour</u> <u>Code Part II</u> (CLC Pt II or the Code) and its regulations, the <u>Canada Occupational Health and Safety Regulations</u> (COHSR).

#### APPLICATION

This policy applies to all POLAR employees and workplaces controlled by POLAR and includes any workplaces not controlled by POLAR, but where POLAR controls the activities of employees engaged in work on behalf of POLAR, i.e. field work.

For the purposes of this policy, and in accordance with the interpretation of the *Canada Labour Code Part II*, the term "employee" implies a much broader scope than the definition in the <u>Federal Public Sector Labour Relations Act</u> and includes every person in an employment relationship with the employer, such as casuals and terms.

The Code outlines the specific duties of employers in respect of every workplace controlled by the employer and in respect of every work activity carried out by an employee in a workplace that is not controlled by the employer, to the extent that the employer controls the activity of its employees. In essence, the workplace "follows" the employee wherever the employee is engaged in work for the employer.

This is important for POLAR as the work carried out by employees is not always in a workplace controlled by POLAR. This includes employees working in third-party premises, those who telework, and employees who have duties that are not conducted from a fixed location.

#### HAZARD PREVENTION PROGRAM

POLAR is committed to implementing preventive measures in order to eliminate, reduce or control known or foreseeable workplace hazards.

Preventive measures should consist first of the elimination of hazards, then the reduction of hazards, and finally the provision of personal protective equipment, clothing, devices or materials, all with the goal of ensuring the health and safety of employees. This interpretation of preventive measures is often referred to as the "hierarchy of controls" approach to addressing hazards.





Preventive measures include providing employees with OHS training to reduce risks through appropriate hazard control measures in the following areas:

- Laboratory Safety
- Ergonomics
- Fall Protection
- Firearm Safety
- First Aid
- Hazardous Occurrences Reporting and Recording
- Job Safety Analysis and Safe Work Procedures
- OHS Orientation
- Personal Protective Equipment and Clothing
- Persons Granted Access to the Workplace, i.e. visiting scientists, other visitors, etc.
- Working Alone
- Workplace Inspections
- Workplace Violence Prevention

### RESPONSIBILITY AND ACCOUNTABILITY

- The Canada Labour Code Part II outlines a shared responsibility for health and safety in the workplace [referred to as the Internal Responsibility System (IRS)]. The concept behind the IRS is that all employees are responsible for occupational health & safety, relevant to their position in the organization, and share in a collaborative approach to resolving health and safety concerns.
- Notwithstanding this, the *Code* also recognizes the accountability of the employer and its representatives for the implementation and enforcement of legislated requirements. Every manager and supervisor is personally accountable for the safety of their employees.
- In POLAR, responsibility and accountability starts with the President and is delegated with authorities to Directors, managers and supervisors.
- Managers and supervisors are therefore responsible and accountable for the implementation of this policy, for ensuring compliance with it, and for ensuring the health and safety of all employees reporting to them as outlined in the POLAR Organizational Chart.

# **SPECIFIC ROLES AND RESPONSIBILITIES**

The **POLAR Board of Directors** is responsible for:

 Providing an oversight function for POLAR, including approving Science and Technology Plans as well as annual workplans and budgets, and may request regular updates from the President on the status of the POLAR OHS Program to fulfill their oversight role; and,



 Taking reasonable steps to make informed decisions about whether POLAR has appropriate OHS policies and programs in place to ensure the health and safety of POLAR employees, meet legislated requirements, and ensure due diligence and inform the President accordingly for corrective actions.

**The President and CEO** has the overall responsibility for day-to-day management of POLAR and accountability for OHS in POLAR by:

- Ensuring the development and implementation of the POLAR OHS Policy and OHS Program;
- Delegating OHS responsibilities, along with the appropriate authorities, to POLAR's Chief Scientist, Directors, managers, and supervisors in accordance with the POLAR Organizational Chart;
- Ensuring that appropriate resources are allocated for the development, implementation and monitoring of OHS policies and programs to effectively eliminate where possible and, where not possible, control hazards and reduce risks;
- Holding subordinates accountable for their delegated OHS responsibilities; and,
- Ensuring an effective process for the monitoring of and reporting on OHS programs.

# The Chief Scientist is responsible for ensuring:

- The effective management of OHS issues in Science and Technology (S&T), and Knowledge Management and Engagement (KM&E), as outlined in the POLAR Organizational Chart, including the commitment of necessary funds; and,
- That directors, managers and supervisors in S&T and KM&E have been adequately trained and made aware of their roles and responsibilities for health and safety and are held accountable.

# **Directors** are responsible for:

- Ensuring the effective management of OHS issues in their area of responsibility as outlined in the POLAR Organizational Chart;
- Ensuring that managers and supervisors have been adequately trained and made aware of their roles and responsibilities for health and safety and are held accountable:
- Providing support to workplace OHS committees; and,
- Selecting an employer representative from POLAR's Senior Management Committee to represent management on workplace OHS committees.

# **Director, Finance and Facilities Management** is responsible for:

Managing the POLAR OHS Program;





- Providing support to and ensuring the proper functioning of any OHS Committee established in POLAR;
- Liaising with regulatory bodies and central agencies concerning OHS matters, (i.e. Employment and Social Development Canada (ESDC) Labour Program Health and Safety Officers);
- Ensuring a uniform approach to health and safety matters in the agency in consultation with the POLAR OHS Policy Committee;
- Developing, communicating, implementing and monitoring OHS policies and programs;
- Developing and coordinating OHS-related education and training programs; and,
- Coordinating OHS program reports, and reporting to central agencies as required.

# **Managers** are responsible for:

- Implementing OHS policies and programs in their area of responsibility as outlined in the POLAR Organizational Chart;
- Providing training to supervisors to ensure they are competent in carrying out their OHS responsibilities and are held accountable;
- Distributing information to employees and ensuring they have the instruction, training and supervision necessary to ensure their health and safety;
- Ensuring that employees are provided with and use such safety materials, equipment, devices and clothing as are prescribed for the work being performed;
- Responding to any health & safety complaint by an employee as soon as possible; and,
- Ensuring that contractors and visitors comply with all POLAR/CHARS OHS policies and procedures.

# **Supervisors** are responsible for:

- Protecting the health and safety of employees by conducting hazard assessments of their employees' work activities in consultation with the workplace OHS Committee;
- Ensuring that employees are made aware of every known or foreseeable safety or health hazard in the work location;
- Ensuring that the established procedures for the reporting and investigation of hazardous occurrences are followed;
- Providing employees with, and ensuring they use, the information, instruction, training and supervision necessary to ensure their health and safety;
- Providing employees with, and ensuring they use, any safety equipment and clothing as are prescribed for the work performed, including any necessary information, training and supervision regarding its use;





- Ensuring that employees abide by all OHS procedures established for their protection and are held accountable; and,
- Responding to any health and safety complaint from their employees as soon as possible.

# **Employees** are responsible for:

- Using in the prescribed manner all such safety equipment and clothing provided to them for their protection;
- Following prescribed safety procedures and complying with all instructions concerning health and safety in the workplace;
- Taking all reasonable and necessary precautions to ensure their health and safety and that of other employees and any persons granted access to the workplace;
- Participating in all required health and safety education;
- Cooperating with any Workplace OHS Committee; and,
- Reporting to their supervisor/manager all hazardous occurrences or situations likely to be hazardous to their health and safety, or that of other persons in the workplace.

# **The POLAR OHS Committee**, in its role as the OHS Policy Committee, is responsible for:

- Participating in the development, implementation and monitoring of the POLAR OHS Program, including overseeing policy issues that may affect the Ottawa Office, and all issues pertaining to the health and safety of staff at the CHARS campus in Cambridge Bay, Nunavut;
- Receiving, considering, and expeditiously dealing with issues relating to the health and safety of employees that are raised by Committee members;
- Participating in the development and monitoring of the hazard prevention program;
- Monitoring data on work accidents, injuries and health hazards and recommending appropriate preventive measures to address areas of concern;
- Participating in the planning and implementation of changes that may affect OHS at the agency level, including work processes and procedures;
- Participating in the implementation and promotion of OHS programs for the education and protection of employees;
- Participating in all inquiries, investigations, studies and inspections
  pertaining to occupational health and safety including such
  consultations as may be necessary with persons who are professionally
  or technically qualified to advise the committee on those matters;
- Regularly monitoring the effectiveness of OHS programs and adherence to OHS procedures through regular workplace inspections and reporting hazardous situations to management for appropriate action;





- Ensuring that adequate records are kept by the employer on work accidents, injuries and health hazards and regularly monitoring data relating to those accidents, injuries and hazards; and,
- Cooperating with ESDC Labour Program Health and Safety Officers.

## MONITORING AND REVIEW

- This policy will be reviewed by POLAR's Senior Management Committee at least once every five years in consultation with the POLAR OHS Committee.
- Changes to the policy are approved by the President and CEO of POLAR.

# **ENQUIRIES**

Martin Turpin

Enquiries concerning this policy should be addressed to the Director, Finance and Facilities Management, who is the delegated authority for the management of the POLAR OHS Program.

# **POLICY VERSION CONTROL**

Date	Version #	General Summary of Changes
April 2018	1	Policy approved by the POLAR OHS Committee
June 2018	2	Policy approved by POLAR Senior Management

Approved by the POLAR OHS Committee	2018-08-20

Date

Employer Co-Chair Employee Co-Chair

Angulalik Pedersen

