

Back to Business:

Risk Management Considerations
during the COVID-19 Pandemic –
A Canadian Playbook

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The COVID-19 pandemic challenges all aspects of work. As businesses attempt to return to work, there are many new liability risks and employer obligations to consider. How an employer assesses, implements, and communicates new policies and procedures will have a lasting impact on employee productivity, engagement, and commitment.

In response, [HUB Risk Services](#) has developed this playbook to assist clients in developing their risk mitigation strategy and coverage-specific issues related to people, property, and loss prevention. The team is available to help clients navigate the uncharted and uncertain territory ahead.

I. Employee Health, Safety and Compliance

As municipal, provincial, and federal officials begin to loosen and lift COVID-19 related restrictions, employers must develop and implement strategies to address employee safety, manage legal risk and plan for future contingencies. Additionally, clear communication to employees regarding the most up to date scientific, public policy, and/or medical guidance is required to ensure health and safety compliance.

Employer's Obligations and Liability for Safety

In Canada, there is multiple and overlapping occupational health and safety legislation in place. Common to all the health and safety legislation across Canada, is a "General Duty Clause." While each province and territory may express this concept slightly differently, the General Duty requirement provides that:

Employers have a general obligation to "take every precaution reasonable" in the circumstances to protect the health and safety of every employee from hazards in the workplace.

Listed below are some examples of the "General Duty Clause" in various provinces:

The Ontario Occupational Health & Safety Act (OHSA) Part II, Section 25(h):

"An employer shall take every precaution reasonable in the circumstances for the protection of a worker."

The British Columbia Occupational Health & Safety Act Part 2, 2.2 General Duty:

"Despite the absence of a specific requirement, all work must be carried out without undue risk of injury or occupational disease to any person."

The Nova Scotia Occupational Health & Safety Act, 13(1):

"Every employer shall take every precaution that is reasonable in the circumstances to ensure the health and safety of persons at or near the workplace."

The "General Duty Clause" is not about a specific type of hazard or control in the workplace, it is broad in scope to encompass exposures that can be present in any workplace. Regulators often cite the clause when they cannot prosecute an employer under a specific regulation.

The Internal Responsibility System (IRS) is another common principle in Canadian occupational health and safety legislation. Essentially, it is the requirement that everyone in the workplace from the owner, president, supervisor, and employee is responsible for health and safety. The IRS is based on the three pillars of authority, responsibility and accountability. Employee involvement and participation is necessary to achieve a robust and effective occupational health and safety system.

Occupational health and safety regulation also include the concept of employee rights. The applicable legislation outlines a framework for all employees to equip them with the knowledge they need to perform the job as well as accessibility to health and safety activities in the workplace. The three main employee rights are:

- The right to know what hazards are present in the workplace
- The right to participate in keeping the workplace healthy and safe
- The right to refuse work which the employee perceives as dangerous to themselves or their co-workers.

It is important that employers understand their obligations and their rights to mitigate and manage the risk of working in the new COVID-19 environment. Employees have the right to refuse work under certain specific conditions and if their health and safety is at risk. However, employers are obliged to respond appropriately to introduce precautions to limit the spread of the virus and protect their employees.

In circumstances where an employee has refused work, employers are required to investigate and follow-up, to determine if there is a legitimate hazard to the employee and the workplace.

Part of this investigation includes reviewing current policies, conducting risk assessments, identifying additional exposures and reinforcing required training. Immediate steps must be taken to protect the health and safety of all employees in the workplace. If the employee continues to refuse to work, employers must report the work refusal to their local provincial health & safety authority. Health & safety inspectors will follow-up with the employer and investigate the work refusal and workplace. As employees have the right to refuse unsafe work, employers cannot dismiss, discipline, or intimidate employees if the work refusal was properly reported. If the inspector determines the criteria for a work refusal is not met, the work refusal is dismissed, and the employee is required to return to work. This is a sensitive time for everyone dealing with the COVID-19 pandemic and employers need to be practical and reasonable when responding to workplace concerns or refusals. Employers need to be reminded of these fundamental principles to identify and communicate health and safety hazards to their employees and management.

A. Employer Policies

The guiding principles for employers during this pandemic is to ensure workplaces are doing their part to comply with public health authorities by implementing measures, policies and procedures to keep the workplace and the public safe and healthy. The health and safety legislation mentioned earlier contains foundational elements that create safety policies, hazard-specific procedures and employee-management safety training. A similar approach should be undertaken to manage the risk and exposure of COVID-19 in the workplace.

Employers should consider creating new policies and standards of conduct for employees in the workplace related to COVID-19. More specifically, employers should set clear rules, processes, and expectations for employee behaviour. New policies and procedures may include:

- 1) **Personal Hygiene and Cleaning Practices:** Specific protocols on handwashing, hand-sanitizing, avoiding high-touch areas, avoiding face, eye, nose or mouth contact, respiratory etiquette while coughing and sneezing, cleaning and disinfecting workspace areas and donning and doffing of personal protective equipment. The consideration for the use of a non-medical mask or face covering may be advised for workspaces where maintaining a physical distance of 6 feet or 2 metres is not consistently possible.
- 2) **Physical Distancing:** Policies outlining any changes in the physical workplace, with the addition of new equipment, physical barriers, and changes in lay-out of the workspace. As re-opening phases continue, a policy may include employee tracking and monitoring in the workplace in the event an employee tests positive for COVID-19. New workplace practices for employees to adhere to physical distancing of 6 feet or 2 metres. Adjustments to employee shifts, start times, rotational office time and continuation of work from home can be considerations to assist with physical distancing. Part of these procedures may include entering and exiting the workplace, the reduction in occupancy or elimination of meeting rooms, common spaces, cafeterias, and other means where physical distancing needs to be in place.
- 3) **Illness Reporting and Self-Monitoring:** Procedures outlining if an employee has any symptoms resembling a cold, flu or COVID-19, they should inform management prior to coming to the workplace. Employers should implement a daily health screening questionnaire for employees entering the workplace, and any employee who meets specified criteria may be sent home and advised to complete the Public Health Agency of Canada (PHAC) [self-assessment on the COVID-19 website](#). Based on the PHAC self-assessment employees will be advised on next steps with their symptoms and any further medical treatment needed. These procedures must include the employer's duty to report illnesses acquired at work, including COVID-19, to their jurisdictional Occupational Health & Safety regulator, Workers Compensation Board, a joint health and safety representative (if applicable) and a trade union (if applicable).
- 4) **Responding to Symptomatic and/or COVID-19 Diagnosed Employees:** Procedures outlining steps required if an employee has tested positive for COVID-19 and has been at the workplace within the past seven days. Employers should develop procedures that involve specific protocols for managing scenarios that include symptomatic employees and/or employees diagnosed with COVID-19. If an employee exhibits any COVID-19 symptoms while at work, the employee should be separated from other employees and sent home immediately to self-isolate, complete the Public Health Agency of Canada (PHAC) [self-assessment on the COVID-19 website](#), and contact their healthcare provider. Any work area or space used by the sick person(s) should be closed off until after cleaning and disinfecting is completed. Inform any employees or outside staff (customers, contractors, patrons) who have had close contact with someone who has tested positive for COVID-19 to stay home and self-monitor for symptoms and follow public health guidelines. Sick employees should not return to work in the office or facility until they do not meet the criteria specified in the health screening checklist. Refer to local public health for guidelines.

B. Employee Screening

Based on local public health authority, employers can require employees complete a health screening questionnaire before the start of each work shift. Refer to the “Health Screening Questionnaire” in the Job Aids and Checklist section of this document for a template. The questions can be answered either on a paper-based form or electronically, allowing employees to record their answers. As Canada has started re-opening provinces and territories, it is important to verify what directives are in place for employee screening prior to starting daily work.

By conducting daily screening, employers can prevent and control the exposure to and spread of COVID-19, in the workplace. Any employee who is exhibiting symptoms or answers yes to any of the questions may be sent home and asked to complete the [Public Health Agency of Canada self-assessment](#) online with advisement of next steps. Some of the following screening questions may include:

- Have you or any members of your household travelled outside of Canada within the past 14 days?
- Are you experiencing any of the following symptoms?
 - Fever, Cough, Shortness of Breath, Difficulty Breathing, Chills?
- Have you been in contact with any person who is sick or under investigation for COVID-19 in the last 14 days?

This health screening form can also be applied to any visitors, vendors, contractors and guests who may require entry into the workplace for delivery of services, operations or continuation of business activity. It would be highly recommended to have any third-party individuals on-site to complete this health screening form daily if needed.

C. Temperature Testing

The Canadian Charter of Rights and Freedom protects every Canadian’s right to be treated equally under the law. Both provincially and federally regulated employers are governed by human rights legislation that protects employees from discrimination based on prohibited grounds that include but is not limited to race, gender, sexual orientation. Each province has its own human rights legislation in place.

Prior to the pandemic, taking an employee’s temperature while at work (or asking an employee to monitor their temperature before coming into work) would have likely created human rights and privacy law concerns. However, given the health and safety risks associated with COVID-19, there may be instances where employers may be justified in taking an employee’s temperature as a screening tool. Current exceptions may apply to high-risk exposure workplaces such as the healthcare industry and senior living long-term care sector.

Certain provincial Human Rights Commissions have responded to the circumstances around temperature testing in the workplace. Below are the responses from the following provinces:

“British Columbia’s Human Rights Commissioner’s policy position is that medical assessments or self-assessments to verify or determine an employee’s fitness to perform job duties may be permissible in these circumstances. However, employers should only see information from medical testing that is reasonably necessary to the employee’s fitness to perform on the job and or the employer’s duty to protect the health and safety of

workers on the job in accordance with occupational health and safety requirements.”¹

“The Ontario Human Rights Commission position is that medical assessments to verify or determine an employee’s fitness to perform on the job duties may be permissible in these circumstances under the Code. However, information on medical tests may have an adverse impact on employees with other disabilities. Employers should only get information from medical testing that is reasonably necessary to the employee’s fitness to perform on the job and any restrictions that may limit this ability, while excluding information that may identify a disability.”²

It is important to remember that even in these circumstances, human rights and privacy law issues are still of concern. The Public Health Agency of Canada has advised that where an employer has determined that a temperature test is necessary, it shall do so as follows:

- **Testing Equipment:** Temperature checks should be conducted by using the least intrusive methods available. An example would be non-contact infrared thermometers instead of contact thermometers
- **Qualified Medical Practitioners/Trained Individuals:** Administrators performing the temperature tests should be trained and available to perform these tests in a safe manner by also limiting the spread of the virus during the testing process
- **Written Policy and Procedures:** Employees need to be informed of temperature testing protocols and the intent is to promote a healthy and safe workplace through limiting the spread of COVID-19
- **Medical Directives:** Seeking medical authority and direction from local public health authorities may be required to determine what body temperatures are at risk or concern
- **Recordkeeping:** Limit the documentation recorded as needed only for individuals whose levels are at risk or concern
- **Individuals at Risk:** Those individuals whose temperature is elevated, or advised by public health authority / health care provider to be a concern, should be sent home to complete the PHAC self-assessment tool and/or seek medical treatment

D. Privacy and Confidentiality

As employers begin to learn more about their employee’s individual medical concerns and conditions, it is important to remember privacy and confidentiality laws continue to apply during the COVID-19 pandemic. The Personal Information Protection and Electronic Documents Act (PIPEDA) applies to federal and some private-sector organizations across Canada that collect, use, or disclose personal information. Whether or not PIPEDA formally applies, most employers should be aware of the various privacy concerns associated with collecting employee medical information. British Columbia, Alberta, and Quebec have their own private-sector privacy laws that are very similar to PIPEDA.

On April 17, 2020, the Office of the Privacy Commissioner of Canada (OPC) published an assessment framework to help assess privacy-impactful initiatives in response to the COVID-19 pandemic.

¹ <https://bchumanrights.ca/message-from-commissioner-govender-on-covid-19/>

² <http://www.ohrc.on.ca/en/human-rights-and-covid-19-%E2%80%93-statements-and-resources-canada-and-around-world>

“During a crisis, laws can be applied flexibly and contextually, but they must still apply. Our framework aims to focus on what we believe are the most relevant principles in context, without abandoning others”, says Commissioner Daniel Therrien. “Because privacy is a fundamental human right, it is very important in our democratic country based on the rule of law that key privacy principles continue to operate.”³

The OPC is in a position that the current health crisis may call for flexible and circumstantial application of privacy laws. Therefore, certain measures that would otherwise not be reasonable, may be justified under the circumstances to protect the health of all individuals. The framework sets out some key privacy principles including:

- Legal Authority: The proposed measures must have a clear legal basis
- The measures must be necessary and proportionate, and therefore, be science-based and necessary to achieve identified purpose
- Purpose Limitation: Personal information must be used to protect public health and for no other purpose
- Use de-identified or aggregate data wherever possible
- Exceptional measures should be time-limited, and data collected during this period should be destroyed when the crisis ends
- Transparency and Accountability: the government should be clear about the basis and the terms applicable to exceptional measures, and be accountable for them

In certain circumstances, employers may collect essential personal information from employees in response to a provincially declared emergency. Disclosure must be limited to what is reasonable and appropriate with respect to directives from public health authorities and healthcare practitioners. If there is an exposure in the workplace, the employer should advise the affected employee(s) what steps the employer will take. Any employees who have been exposed to the affected employee(s) will be notified of their exposure.

Under reasonable circumstances if an employer suspects an employee may have COVID-19, the following questions may be asked:

- Is the employee experiencing COVID-19 symptoms or cold and flu-like symptoms?
- Has the employee been exposed to certain risk factors, including recent travel or been exposed to others that have tested positive for the COVID-19 virus?
- Has the employee tested positive for COVID-19?

E. Reducing Workplace Exposure

The federal government developed the following framework⁴ for employers and business owners to identify any COVID-19 related risks that could potentially be associated with their business operations. The document provides risk mitigation strategies that can be implemented and followed to help businesses with decision-making for business operations during the COVID-19 pandemic.

³ https://www.priv.gc.ca/en/opc-news/news-and-announcements/2020/an_200417

⁴ <https://www.canada.ca/en/public-health/services/diseases/2019-novel-coronavirus-infection/guidance-documents/risk-informed-decision-making-workplaces-businesses-covid-19-pandemic.html>

Population at Risk: Employees/Contractors/Clients				
Characteristics	Risk consideration	Public health rationale	Weight	Risk mitigation strategies
Demographics of your workforce and clientele	Are employers/business owners aware that employees/clients are from demographic groups at greater risk of severe disease, such as older adults or people with underlying medical conditions?	Older adults, people with immune compromising conditions and chronic diseases appear to be at greater risk of severe disease, so consideration should be given to protecting them from possible exposure to COVID-19 cases. However, the health status of employees/clients may not be disclosed to their employers. Workplaces/businesses cannot assume they know the health status of their employees.	High importance	<p>Communication about risk to staff/clients should be emphasized;</p> <p>Encourage the use of individual measures such as frequent hand hygiene, physical distancing, respiratory etiquette and staying home when ill;</p> <p>If physical distancing cannot be consistently maintained, employers should consider having employees and clients wear a non-medical mask or face covering.</p> <p>Provide options to the medically at risk to reduce social contacts at work, such as teleworking arrangements, if possible.</p>
	Are your clients at greater risk of spreading the disease (e.g., young children)?	Young children may be at greater risk of amplifying disease transmission because they are generally less compliant with effective hand hygiene and respiratory etiquette practices and tend to socialize with others in a way that is likely to increase transmission. Preventing transmission from these populations indirectly protects the larger population and may reduce demand on the health care system.	Medium importance	<p>Consideration should be given to modifying service delivery (e.g., reducing number of clients using services at the same time, providing services outdoors) and promoting use of individual measures such as frequent hand hygiene, physical distancing, respiratory etiquette.</p> <p>Bear in mind that it may not be possible to mitigate risk for certain groups of individuals (e.g. children are unlikely to comply with physical distancing, hand or respiratory hygiene or wearing a non-medical mask or face covering).</p> <p>Consider need for increased frequency of cleaning especially of high touch services.</p>
-	Are your employees at greater risk of being infected due to recent international travel or attendance at an identified risk setting (e.g., conference where cases were known to be present)?	Returning international travelers and people who potentially had contact with a case (e.g., at a conference or within their household) are being asked to quarantine (self-isolate) at home for 14 days. If they are essential service workers, and are asymptomatic, they may need to return to work within the 14 day period in order to avoid essential service interruption.	High importance	<p>Plan for absenteeism or alternative working arrangements (i.e., teleworking);</p> <p>For returning travellers, who are asymptomatic, and deemed essential workers considerations should be given to more stringent self-monitoring and other measures to reduce exposure and transmission to others (e.g., the use of a non-medical mask or face covering when physical distancing cannot be maintained).</p> <p>Employers should conduct a risk assessment (consider involving the local PHA) taking into account local epidemiology, response goal, critical infrastructure resources and potential positive and negative impacts of recommendations.</p>
Local demographics and epidemiology	Is the local community experiencing an increased rate of COVID-19 infection?	The risk of exposure to staff/clients may be higher in the workplace if there is ongoing local community transmission.	High importance	Consider involving the local PHA in decision-making about workplace/business operations or closure.
	Is the local population at increased risk of severe disease if COVID-19 circulated?	Businesses that interact with communities with a high number of elderly residents, higher rates of chronic disease or challenges accessing health care services may want to reduce their activities to limit exposures within the community.	Medium importance	
Environment: Workplace/Setting				
Type of service	What kind of service does your workplace/business provide (e.g., customer service, food service, manufacturing, hoteling, rideshare, etc.)?	<p>The risk of being exposed and/or acquiring the infection is greater if employees/clients interact more closely (i.e., close contact) with one another or with numerous clients (e.g. personal care services).</p> <p>The number and duration of the exposures also have an impact on the risk of transmission. The more numerous or the longer the exposures, the higher the risk for transmission.</p> <p>Given that COVID-19 can survive on surfaces and objects for hours to days, work and/or services that are transactional in nature may represent a higher risk of exposure (e.g., exchange of money or items).</p>	High importance	<p>Adjust workplace policies and procedures to reduce physical contact, such as teleworking arrangements, flexible hours, staggering start times, use of email and teleconferencing;</p> <p>Modify infrastructure to enhance physical distancing by 2 metres;</p> <p>Where possible, consider going cashless. If this is not possible, encourage hand hygiene after exchange of money or items;</p> <p>Reinforce the importance of frequent hand hygiene, physical distancing, and respiratory etiquette</p> <p>Reinforce safe food handling practices.</p>
	Will employees/clients be participating in activities that	Activities that could contribute to spread include, but are not limited to singing,	High importance	Reinforce the importance of frequent hand hygiene and respiratory etiquette

Population at Risk: Employees/Contractors/Clients

	promote transmission?	cheering, close physical contact (less than 2 metre), and touching common objects (e.g., hand rails, utensils).		<p>Reinforce physical distancing measures (e.g. avoid greetings like handshakes, maintain 2 metre distances between people wherever possible);</p> <p>If physical distancing cannot be consistently maintained, employers should consider having employees and clients wear a non-medical mask or face covering.</p> <p>Avoid sharing communal office equipment/supplies (e.g., tablets, electronic devices);</p> <p>Avoid potlucks, buffets, where serving utensils, plates, trays and other objects may be handled by multiple people.</p>
	Does your workplace/business provide essential services?	Essential workers are considered critical to preserving life, health and basic societal functioning. This includes, but is not limited to, first responders, health care workers, critical infrastructure workers, hydro and natural gas, and workers who are essential to supply society by critical goods such as food and medicines.	High importance	<p>Consider the societal impacts of altering, reducing or stopping services;</p> <p>Review and revise, as needed, your business continuity plans to prioritize key functions in the event of high workplace absenteeism.</p>
Setting/Location	In what setting is your workplace/business located (i.e., a community-setting, large public space, office)?	A workplace/business located in a public space with high traffic is at an increased risk of being exposed/infected with COVID-19 due to the number of people coming in and out of the setting (i.e., high number of potential introductions of the virus).	High importance	<p>Workplaces/businesses that operate in public spaces and/or urban centres can consider modifying service delivery/hours or closing to reduce spread;</p> <p>Encourage employees/clients to take public transit at non-peak times or to use a personal vehicle if possible to limit contact with others.</p>
	Is the majority of the work/service carried out indoors, outdoors or both?	Work/services offered outdoors (i.e. higher ventilation) are likely to be lower risk than those held indoors (e.g., construction work vs. administrative work in an office).	Medium importance	<p>Reinforce the importance of frequent hand hygiene, respiratory etiquette, and physical distancing.</p> <p>If physical distancing cannot be consistently maintained, employers should consider having employees and clients wear a non-medical mask or face covering.</p> <p>Employers/businesses with more than one location are encouraged to adopt a tailored approach on workplace measures based on local context.</p>
	Is your workplace/business in a geographically remote area or in close proximity to a densely populated area?	A workplace/business located in a more densely populated area (e.g., metropolitan), may have higher exposure/infection risks. Proximity of a workplace/business to a densely population area could result in a more rapid dissemination of disease.	Medium importance	
	How do clients/customers/contractors primarily access your workplace/business (e.g., public transit, personal car)?	Workplaces/businesses accessible primarily via public transit may be at an increased risk of transmission due contact of potentially contaminated surfaces/objects and proximity with other individuals (especially at peak times) for a long period of time.	Medium importance	
Planning	Does your workplace/business have a pandemic preparedness plan?	Workplaces/businesses with robust pandemic are more likely to be able to adapt their operations/activities based on recommended public health advice.	High importance	<p>Review and revise, as needed, your business continuity plans to prioritize key functions in the event of high workplace absenteeism;</p> <p>Update emergency contact information of employees/contractors.</p>
	Does your workplace/business have a robust business continuity plan addressing issues like critical operations, prioritization of work/services, surge capacity planning, cross-training of employees.	Workplaces/businesses with robust business continuity plans are more likely to be able to adapt their operations/activities based on recommended public health advice.	High importance	
	How will staff absenteeism impact your operations?	Many employees/clients could be ill or be a caregiver to an ill person (e.g., elderly parent, child), therefore would be unable to attend work for a number of days or weeks. Are employees cross-trained to assume other functions within your workplace/business? Determine how you will operate if absenteeism spikes from increases in sick employees, those who stay home to care for sick family members, and those who must stay home to watch their children if dismissed from school.	High importance	<p>Prepare to institute flexible workplace and leave policies for employees who are sick, in self-isolation, or caring for family members.</p>

Population at Risk: Employees/Contractors/Clients				
	Do you have a risk communication plan to share information with your employees, contractors and clients?	Workplaces and businesses with an existing risk communication plan are more likely to be able to ease employees'/clients' fear, anxiety, rumors, and misinformation. This will contribute to a more productive workforce in uncertain times. Good communications channels are key to reinforce public health measures in the workplaces such as hand hygiene, respiratory etiquette, and staying home when ill in order to limit transmission. It may also help with compliance with public health advice.	Medium importance	Develop a risk communication plan to ensure effective and efficient communication with employees, contractors and clients.
	Does your workplace/business employ a small or large number of employees?	The larger the number of employees/clients, the greater the likelihood of one of them being a case or a contact of COVID-19. Large numbers of people may also create greater likelihood of crowding (e.g., boardroom, gym class). However, larger workforces may be better able to manage absenteeism.	Medium importance	Consider staggering work hours to reduce crowding and close contact; Consider retaining employees with critical functions only to reduce crowding and close contact. Consider cancelling non-essential activities in the workplace Reinforce the importance of frequent hand hygiene, respiratory etiquette, and physical distancing. If physical distancing cannot be consistently maintained, employers should consider having employees and clients wear a non-medical mask or face covering.
Policies and practices	Can your workplace/business support flexible workplace policies (i.e., teleworking arrangements, staggered hours)?	Workplaces and business with flexible workplace policies will help reduce transmission amongst staff by reducing close contact between employees and/or clients.	High importance	Consider relaxing sick leave policies that support employees in isolation at home when ill, or in quarantine (self-isolation) due to exposure to a case or return from international travel (e.g., suspending the need for medical notes to return to work).
Mental health	Does your workplace/business offer mental health support to your employees?	Employees/clients may experience increased stress associated with COVID-19 that can bring up historical traumas, trauma of past emergency events, or exacerbate ongoing personal or community stressors. Mental health support may contribute to a more present and productive workforce.	Low importance	Tailor plans for minimizing stress based on the employee/client situation; Provide mental health support services.
Infrastructure	Can your workplace/business infrastructure be easily altered/modified to implement public health and infection prevention and control measures (e.g., additional hand cleaning stations, spatial separation of 2-metre between workstations)?	Respiratory droplets tend to fall within 2 metres of their source, so maintaining a 2-metre distance from others is a precaution to prevent spread. If the employer/owner is unable to modify the workplace/venue to maintain spatial separation between employees and/or clients (ideally 2 metres), the risk of transmission is greater (e.g., spacing out tables in restaurants, leaving a couple of empty seats between moviegoers). Hand hygiene should be performed more frequently. Alcohol-based hand rub (60% alcohol or greater) or hand washing sinks with soap and disposable towels should be made readily available.	Medium importance	Reinforce the importance of frequent hand hygiene, respiratory etiquette, and physical distancing; Provide access to handwashing facilities and place hand sanitizing dispensers in prominent locations throughout the workplace/business, if possible; Provide additional respiratory etiquette supplies such as tissues, lined waste container, and hand hygiene products/supplies; Consider increasing the spatial separation between desks and workstations as well as individuals (e.g., employees, customers) from each other, ideally a 2 metre separation or use a physical barrier (e.g., cubicle, Plexiglas window), if possible; If physical distancing cannot be consistently maintained, employers should consider having employees and clients wear a non-medical mask or face covering.
	Are there restricted points of entrance and exit that force people to be in close proximity and/or pass through high-touch areas (e.g. turnstiles, fingerprint entry, doors and elevators)?	Crowding and lines at bottlenecks can put employees/clients at increased risk of exposure to respiratory droplets. High-touch surfaces can also be contaminated and increase the risk of transmission. Use approved hard surface disinfectants .	Medium importance	Enhance your environmental cleaning procedures and protocols with a special attention to high-touch surfaces and object.
Environmental cleaning	Does your workplace and business have existing environmental cleaning procedures and protocols? Can they be enhanced to align with public health advice?	Routine cleaning of frequently used surfaces and objects help to prevent the transmission of COVID-19 in order to mitigate the risk of people becoming infected through self-inoculation after touching contaminated surfaces and/or objects (fomites). The virus that causes COVID-19 has the potential to survive in the environment for up to several days. Cleaning, particularly of frequently touched	High importance	Enhance your environmental cleaning procedures and protocols with a special attention to high-touch surfaces and objects (e.g., phones, elevator buttons, computers, desks, lunch tables, kitchens, washrooms, cash registers, seating areas, surface counters, customer service counters, bars, restaurant tables/menus).

Population at Risk: Employees/Contractors/Clients

		surfaces and objects (fomites), can kill the virus, making it no longer possible to infect people.		
	Will high-touch surfaces be cleaned and disinfected frequently?	The virus that causes COVID-19 may live on surfaces for a few hours or up to a few days. High-touch surfaces can be contaminated and increase the risk of transmission. Use approved hard surface disinfectants. The frequency (i.e., one contact versus multiple contacts) and duration (i.e., transient contact versus prolonged contact) of exposure to high-touch surfaces and objects could potentially increase the risk of contamination.	Medium importance	
Occupational Health and Safety - Including use of Personal Protective Equipment (PPE) This guidance does not pertain to a high risk setting such as a health care setting.	Do your employees have access to Occupational Health and Safety services on site? How will symptomatic individuals in the workplace/business setting be handled? How will contacts be handled?	Although screening may not identify all individuals infected with COVID-19 in the workplace/business, occupational health and safety professionals may be able to quickly and safely identify and isolate symptomatic individuals in the workplace.	Medium importance	Plan for rapid isolation of a symptomatic employee; Identify an area where employees/clients can be isolated if they become ill at the workplace; Ensure that health care professionals onsite are using appropriate PPE and infection prevention and control (IPC) measures, as per usual procedure.
	Has the Occupational Health and Safety office assessed risk associated with employee interactions with the public?	Employees whose duties require them to interact face to face with the public may be at increased risk due to their proximity to people whose health status is not known.	High importance	A risk assessment that considers both the risk associated with a specific task/activity as well as the characteristics of the source of the infection (e.g. a sick person or a contaminated environment) should be undertaken to determine the most appropriate interventions. Employees who interact in person with the public (within 2 m), with objects handled by the public, or with spaces occupied by the public, should perform hand hygiene often and between every interaction with members of the public. Tools and technologies to minimize contact with the public should be used, such as having customers scan and pack their own purchases when possible. If feasible, barriers, such as clear Plexiglas screens, to protect employees who must interact within 2 metres of the public should be considered. If physical distancing cannot be consistently maintained, employers should consider having employees and clients wear a non-medical mask or face covering. Employees should be reminded not to touch their faces or the non-medical mask/face covering while using it. If workers (that are not health care providers) must perform tasks within 2 metres of people diagnosed with COVID-19, that have symptoms of COVID-19, or their environment, should consult their occupational health and safety department to discuss the need for additional PPE such as medical mask, gloves, eye/face protection and gown (droplet precautions). If PPE is recommended, it must be selected based on the results of a risk assessment and used correctly; training on its use including putting it on (donning) and taking it off (doffing) should be provided. Gloves are recommended when workers will be in direct contact with an ill person, or a contaminated object or environment. Misuse of gloves and other PPE increases risk of infection due to improper handling of potentially contaminated gloves and equipment. If they must be worn because the staff may come in contact with contaminated material they must be applied correctly .
	Has the occupational health and safety office assessed the risk of employees interacting directly with spaces occupied by the general public?	Employees whose duties require them to have direct contact with spaces occupied by the general public may be at increased risk due to contact with objects that could be contaminated.	High importance	Mitigation as above

Population at Risk: Employees/Contractors/Clients				
Traveling	Does your workplace/business conduct frequent domestic/international travel?	Returning business travelers from international destinations are currently being advised to self-isolate for symptoms for 14 days following their arrival in Canada. This leads to greater absenteeism if the worker cannot work from home etc. The evolving nature of the outbreak makes planning travel unpredictable, and international travel comes with the risk of increased exposure, being quarantined abroad, or becoming a contact of a case during plane travel.	High importance	Actively monitor travel advisories and provide information about the risk of travel; Cancel all non-essential travel outside of Canada; Assess the need for business travel based on the risks and benefits, and consider alternative approaches such as virtually attending meetings; Plan for absenteeism or alternative working arrangements (i.e., teleworking) if international travellers are unable to return to the workplace as per PHA advice.

F. Creative and Adaptive Staffing Models

The best time to make changes or experiment is when there is a large degree of ambiguity. Companies now have a better understanding of what it means to be agile, but the path forward is not particularly clear. Managers have first-hand experience to show what work can be done virtually and what is better accomplished on premise. With this new insight, leadership can take what has been learned, go a step further and test new staffing models which can better manage workplace density as well as promote employee engagement.

There are two specific concepts to consider, including split teams and phased approaches. Splitting teams divides the department or function into teams that rotate between working remotely and in the workplace. This approach is especially beneficial when there is insufficient work space to maintain recommended physical distancing.

A phased approach to returning employees to the workplace in smaller cohorts provides the following benefits:

- Effective employee health screening, enhanced workplace cleaning, and physical distancing protocols can be re-deployed with less confusion
- More time is available to build an adequate Personal Protective Equipment (PPE) inventory and to re-configure work spaces as needed

Various criteria form the basis to determine a company's required staffing level. It may include role criticality, the necessity of specialized equipment to complete assigned tasks, the level of personal risk tolerance for employees, and other factors that impact the employees' motivation to return to work. A collaboration between managers and Human Resource administrators is essential to develop a practical and focused staffing approach.

G. Top 10 Tips to Protect Employee's Health and Safety


- 1) Actively encourage employees who are sick or are experiencing COVID-19 symptoms to stay home.** Develop policies that encourage sick employees to stay at home without fear of reprisals, and ensure employees are informed of these policies.
- 2) Develop other flexible workplace policies** for creative work scheduling and telework (if feasible) and create leave policies to allow employees to stay home to care for sick family members or care for children if schools and childcare are closed.

- 3) **Promote etiquette for coughing, sneezing, and [handwashing](#).** Provide tissues, no-touch trash cans, soap and water, and hand sanitizer with at least 60% alcohol.
- 4) **Perform routine environmental cleaning.** Routinely clean and disinfect all frequently touched surfaces, such as workstations, countertops, handrails, and doorknobs. Discourage sharing of tools and equipment, if feasible.
- 5) **Provide education and training materials** such as fact sheets and posters in an easy to understand format and in the appropriate language and literacy level for all employees.
- 6) **Speak with employees about their concerns.** Some employees may be at higher risk for severe illness, such as older adults, and those with chronic medical conditions.
- 7) **Talk with service vendors and contractors** regarding their employees and any contract or temporary employees about their COVID-19 safety measures and procedures. Advise and train third-party employees on current safety practices and policies to limit the exposure to COVID-19.
- 8) **Implement practices to minimize face-to-face interactions between employees** Actively encourage flexible work arrangements such as teleworking, split teams, staggered shifts or phased staffing.
- 9) **Consider business travel needs and explore alternatives.** Check the [Government of Canada Travel Advisory](#) on the latest travel restrictions and recommendations.
- 10) **If an employee becomes sick while at work,** they should be separated from other employees, customers, and visitors and be sent home immediately. Follow the Public Health Agency of Canada guidelines for cleaning and disinfecting areas in the workplace.

H. Managing Leave Policies

Many companies have adjusted employee leave policies during the “shelter in place” orders. Now that provinces and territories have started to re-open the economy in phases, companies are in various stages of resuming business operations. In some cases, as companies resume operations, employees may not be ready to return to work due to the following circumstances:

- The company is opening in a phased approach and the managers have designated the employee for a later phase
- The employee may be grieving a COVID-19 related loss and need additional support
- The employee may be currently in quarantine
- The employee’s children are unable to return to school or childcare
- The employee needs to care for an ill family member that is convalescing at home
- The employee has special medical conditions where an exposure to infection poses increased risk



The Canadian government has proposed new job protected leaves for COVID-19 specific situations across Canada. The Federal government amended the Canada Labour Code, which applies to federally regulated employers and now provides an unpaid leave of up to 16 weeks for employees who are unable or unavailable to work for reasons related to COVID-19. As with other leaves under the Code, there is no reprisal, the employer cannot dismiss, suspend, layoff, demote or discipline an employee because the employee intends to take a COVID-19 leave. The provinces and territories have all adopted similar leaves that are not limited to the following: COVID-19 Leave (YT, BC, AB), Public Health Emergency Leave (SK, MB) New Personal Illness or Injury Leave (BC), Declared Emergency Leave (ON), Infectious Disease Leave (ON), Communicable Disease Emergency Leave (NL), New Emergency Leave (NB) and Temporary Assistance Workers Program (QC). In addition, several leaves may already apply to employees under short term disability policies/contracts, employment contracts, collective agreements, company policies, and provincial employment standards legislation.

At this time, companies and organizations need to support employees in all areas related to resuming work operations whether it is at work, at home, on leave, or other options that could be accommodated. Therefore, companies will need to review their existing short-term disability and emergency leave policies, and develop creative options for their workforce. Some options for employers may include modifying their emergency leave policies, revising sick leave policies, and leave of absence options. Managers will need additional professional support (Human Resources, OH&S, Legal, etc.) to navigate these leave policies to ensure consistent implementation for the entire workforce.

II. Premises Liability & Customer Safety

Organizations need to consider their premises liability exposures when re-opening their business and take steps to reduce the risks associated with customer and employee interactions. To assist in developing an action plan, below are steps an employer may follow to develop their own premises liability risk mitigation program:

Assessment – Representatives from management, along with employees, should evaluate operations to identify risk mitigation opportunities. Look for conditions on the premises that may contribute to potential exposures that could present adverse risk.

Planning – Management should create guidelines to standardize the practical considerations that arise from the assessment. Managers should specifically identify the measures and steps it must take to remedy the conditions identified in the “Assessment” phase.

Implementation – Management will execute the plan and risk mitigation steps and strategies. Execution includes training for the new policies / procedures and related documentation.

Evaluation – Once the premises liability risk mitigation program is implemented, it is important to establish an ongoing evaluation and review of the program. The company should engage in a continual review of the process, policies, procedures, and outcomes.

A. Phase 1 – Assessment


- 1) Create a task force consisting of stakeholders from various levels in the organization to perform an assessment and determine feasibility, timing, and process for re-opening. The working group should also assist to develop and enforce policies, procedures, and guidelines.
- 2) Consider identifying a company representative as a point of contact for employees, vendors, and customers for task force updates.
- 3) Confirm that local, provincial, and/or federal authorities have authorized your business to re-open.
- 4) Determine the occupancy of the building/space to assist with phased occupancy and to meet physical distancing standards.
- 5) Identify physical items that could expose customers, vendors, or employees to COVID-19.
- 6) Identify areas where frequent employee/customer/vendor interactions occur and where customers, visitors, and/or employees may gather; establish a game-plan to ensure physical distancing and limit exposure risks in these areas (for example, points of sale, elevators, public restrooms, vending machine areas, breakrooms, smoking areas, conference rooms, reception areas, etc.).
- 7) Business owners may want to consider varying and/or limiting hours of operation to limit risk to employees and visitors/customers.

- 8) If there are customer seating areas or table service, consider a plan to establish physical distancing placement or potentially postponing these services until full occupancy becomes safely possible. Additionally, consider closing or limiting break room and conference room access.
- 9) Review, evaluate, and determine which vendors are essential to immediate operations. Organizations should consider which vendors are essential to operations or what contractual obligations and duties may require continued services.
- 10) In addition to developing policies, organizations should also consider signage putting people on notice of specific rules and expectations. For example, organizations may identify areas where signage regarding hand sanitizer/wipes, physical distancing, and prohibited entry for individuals with identified COVID-19 symptoms. Be sure to inform visitors of the organization's expectations and encourage proper sanitary practices, respiratory etiquette, and physical distancing measures.

B. Phase 2 – Planning

The planning stage should incorporate all the items that were evaluated in the assessment phase and support the development of standardized processes for staff, vendors, and customers to follow.

- 1) Create a checklist of high traffic areas to be sanitized. This may include shared electronic equipment, or shared items such as display merchandise, carts, baskets, parking terminals/meters, doors, handles, etc.
- 2) Consider limiting occupancy of a building or space as part of a phased re-opening strategy, keeping the following considerations in mind:
 - Limit occupancy in elevators, stairwells, etc. depending on the layout and location of the business
 - Continually monitor the effectiveness of limiting maximum occupancy. This will largely depend on the size and layout of the building or space
 - Refer to local regulations and officials to assess regional impact of the pandemic
- 3) Consider limiting occupancy of the building or space to between 25-50% (or less) of maximum capacity for the first two weeks of re-opening:
 - Note that this may also include limiting occupancy in elevators, stairwells, etc. depending on the layout and location of the business
 - Continually monitor the effectiveness of limiting maximum occupancy. This will largely depend on the size and layout of the building or space
 - Refer to local regulations, as they may be more stringent than the guidelines provided above

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- 4) Consider identifying and allocating staff or security to monitor customers/visitors entering and exiting the location during peak hours. Some businesses may need to institute a “one- in/one-out” policy during peak hours, with staff or security on standby at entrances/exits to monitor and control customer traffic.
 - 5) Once all high traffic areas are accounted for, consider creating a checklist of areas that require frequent sanitizing and develop a corresponding schedule:
 - Document cleaning activities
 - Determine areas that need sanitizing on an ongoing basis vs. on a schedule, such as a Point of Sale (PoS) system that is frequently handled
 - 6) Depending on the nature of the operations consider suspending certain services that pose a significant threat to public health (e.g. self-service food and beverage stations, table service, etc.).
 - 7) Consider creating partitions between employees and customers in areas where there is significant customer-employee interaction (e.g. order terminals and other PoS).
 - 8) Post signage to advise customers if employees are being screened for COVID-19.
 - 9) Prior to giving access to vendors, consider sending a COVID-19 self-screening assessment form to be completed. (See Section IV Job Aids & Checklists for health screening questionnaire).
 - 10) Defer non-essential vendor use. Consider developing a vendor credentialing or screening program and access list with a disposable badge that they receive if needed to enter. This should be a one-time-only use badge to identify they are approved to be “on-site.”
 - 11) Follow public health guidelines regarding the use of face coverings for employees, customers, visitors, vendors and the general public. Current Government of Canada guidance is to wear face coverings or non-medical masks in public and office settings where physical distancing measures are difficult to maintain (e.g., grocery stores and pharmacies), especially in areas of significant community-based transmission.
 - 12) Planning should include various communications designed to provide information on what the organization is doing, why it is being done, and how guidelines are being applied in a consistent manner.

C. Phase 3 – Implementation

As employers engage in re-opening activities, they should focus on the following aspects of their operation including; access, disinfection, communication, and evaluation.

Access

- 1) Have controls in place to maintain physical distancing for high-traffic areas:
 - Areas of concern may include: entrances/exits, elevators, stairwells, points of sale, shared electronic equipment such as ATMs and vending machines, areas where queues may form, etc.
 - Consider marking the floor with spaces that are at least 6 feet or 2 metres apart and placing signage to alert customers of the system in place.
 - In addition, provide hand sanitizer/wipes or have staff on standby to sanitize these areas frequently throughout operating hours.
- 2) During this period of phased occupancy, consider seating areas, tables, etc. may still need to be eliminated or at least limited until it is deemed safe for people to congregate in larger groups.
- 3) Limit operating hours: Consider implementing a process by which only certain customers are permitted in a location during certain hours (i.e. opening an hour early for higher risk customers like those who are elderly or have certain medical conditions that make them more susceptible to contracting COVID-19).
- 4) Confirm all lighting (exterior and interior) is in good working condition.
- 5) Verify that all security cameras are in good working condition, being monitored, and continuing to save footage.
- 6) For general housekeeping, verify the waste collection company has been advised to resume their regular pickups. All walking paths and means of egress must be cleared in accordance with standard procedures.
- 7) Encourage all non-essential rooms or areas to keep doors closed.
- 8) Continue to require 6 feet or 2 metre physical distancing in all areas.
- 9) Elevator use should be restricted to 1-2 employees at one time, dependent upon elevator size (with signage posted).
- 10) Consider closing office break areas/kitchens and shared coffee machines, water machines or other kitchen appliances. Consider supplying bottled water. If a refrigerator is shared, provide wipes and require the refrigerator to be wiped down before and after each individual use.

- 11) Where possible, maintenance and/or work shift times should be staggered.
- 12) Limit, when possible, the locations where vendors are permitted to enter the facility.
- 13) Stagger the vendor on-site dates and times so that vendors are provided access during work hours that have the least customer or employee presence.
- 14) Provide a separate and specific intake area solely for vendors (separate from areas that would be used by customers or employees) and ensure that this area is disinfected regularly and has disposal for PPE.
- 15) Limit or deny vendor access to common areas such as bathrooms and breakrooms.
- 16) Limit vendors from entering facilities if they can provide the service outside (e.g., packages, food delivery, etc.)
- 17) Please see Property Loss Prevention section for more information on engineering and building equipment maintenance.


Disinfecting

- 1) High traffic areas need to be cleaned and sanitized with increased frequency.
- 2) Depending on the nature of operations, high traffic areas will differ, some may include the following:
 - Entrances and exits (including door handles)
 - Stairwells
 - Elevators
 - Shared terminals or electronic equipment (ATMs, areas where customers place orders, points of sale, parking terminals, vending machines, gas pumps, etc.)
 - Public restrooms
 - Areas where queues form
 - Coolers or display cases
 - Food or beverage dispensers
 - Seating areas and tables
 - Customer assistance items like carts, baskets, electronic wheelchairs, etc.
- 3) Stock all standard cleaning supplies for janitorial staff on site, regardless of whether there is a contract with a third-party cleaning company for COVID-19 cleaning.
- 4) If contracts, invoices, or other documents need to be signed, offer electronic signatures first. If that is not available, either use a disposable pen or clean and disinfect after each use including clipboards, PoS systems, or other similar items.

- 5) Provide disinfecting wipes and hand sanitizer in the main entrances, conference rooms, kitchen/break area for employee usage on door handles, light switches, etc.
- 6) All disinfectants should be approved by the [Government of Canada for COVID-19 use](#).
- 7) Provide notice / signage of chemicals used during cleaning process.
- 8) Clean and disinfect all shared areas such as offices, bathrooms, break rooms, shared electronic equipment (tablets, touch screens, keyboards, remote controls, etc.).
- 9) Consider closing off and deep cleaning any areas where a probable or confirmed case of COVID-19 was identified based on public health guidelines.
- 10) Contract with a licensed and insured third-party cleaning company to clean the facility regularly.
- 11) Coordinate with landlords (and communicate expectations) to have common building areas cleaned at increased frequencies. Focus areas should include but not be limited to: public lobbies and hallways, public bathrooms, security desks, access control points, elevators, and parking garage access points.
- 12) Request an increased frequency of cleaning (at a minimum of daily) for washrooms and common areas.

Communication

- 1) Create signage alerting customers of:
 - Occupancy limitations and procedures that are in place
 - Physical distancing expectations and requirements
 - Employee health testing and monitoring procedures
 - Cleaning efforts in high traffic areas
 - Face masks, physical distancing, and respiratory etiquette
 - Changes to foot traffic to reduce overcrowding
 - Prohibition of anyone entering who has experienced COVID-19 symptoms
- 2) If an employee tests positive for COVID-19, a generic notice should be posted in a conspicuous space notifying vendors, visitors, and others (ensuring that no personal identifying information is included) of a positive test at the facility.
- 3) Allow employees an opportunity to “opt-out” of returning to the workplace if they are not comfortable or not able to do so. Encourage any employees in this situation to talk with local Human Resources.
- 4) For employees returning to the workplace, consider having them sign an acknowledgement of employer workplace rules and policies established to mitigate and manage the COVID-19 risk.

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- 5) Consider including signage in the washroom areas reminding staff of proper handwashing protocols.
 - 6) Assess local situations regarding virus activity and local governmental restrictions prior to opening operations to full capacity.
 - 7) Keep logs of all maintenance work completed including time, work performed, and staff. This should be kept for any third-party work on site.
 - 8) Request the use of PPE by vendors (and all visitors) while they are on premise when they cannot maintain physical distancing requirements. It is recommended to have a dedicated hand-sanitizing station along with disinfectant wipes for their equipment or product they are bringing in. Do not allow vendors to use gloves, rather have them use hand sanitizing soap prior to accessing the premise.

D. Phase 4 – Evaluation

- 1) As public health officials permit, consider increasing the allowed occupancy if it allows for proper physical distancing protocols. Depending on the size and layout of the premises, the allowed occupancy may need to be limited.
- 2) Evaluate the effectiveness of measures provided above.
- 3) Re-evaluate vendor lists and deferred services to determine if there is capacity to safely increase business activity.
- 4) Continue all physical distancing practices as outlined above.
- 5) Assess local situations regarding virus activity, local governmental restrictions, and consider opening to full capacity.

III. Property Loss Prevention

Ramping up or restarting a business during a pandemic requires continuous adjustment. Because the COVID-19 pandemic continues to have an unprecedented impact on daily life, business owners looking forward to ramping up or re-opening operations face significant challenges. Businesses should consider re-organizing and refreshing their property and operational policies and procedures.

A. Evaluation

At the earliest, implement change management measures to:

- 1) Assess the facility for property damages
- 2) Identify all changes
- 3) Identify additional required controls

Understand and evaluate the new operating conditions and exposures:

- 1) **Authorities, municipal, provincial, and federal governmental guidance and requirements for property and facility occupation:**
This includes physical distancing requirements that will affect the facility operations, workspace layout, and/or redesigning the production facility.
- 2) **Employee Shortage:**
In some cases, employers may be faced with an employee shortage which will invariably impact production and productivity. Employers will have to rethink and restructure employee workloads ensuring that employees are first assigned to the most critical tasks and projects.
- 3) **Employee Fatigue:**
Employers should be aware of employee burnout. For example, employers experiencing staffing shortages may increase workers' shift duration and forgo breaks. Loss experience data demonstrates that fatigued workers may result in greater losses and/or losses that may interrupt operations.
- 4) **Utilities and Processes:**
Employers that re-open their business without established re-opening and revised operational procedures may face a strain on utilities and systems.
- 5) **Buildings:**
Employers should conduct a complete walk through of the facility including the building and surrounding property to identify risk conditions and/or abnormal conditions. Employers should be sure not to compromise inspections despite a reduced staff and/or shifts. Employers should identify conditions that may create risk before a loss occurs.

6) **Supplies and Inventory:**

Shortages in the supply chain can compromise an organization's ability to meet production demands. Conversely, increased inventory can create significant fire hazards and/or damages. For example, inventory stored outside the facility but on the premises and too close to the building may create a fire hazard.

B. Guidance

Before re-opening, seek the expertise of legal, insurance, and other professionals. Maintain normal facility operations procedures as follows:

1) **Policies and Procedures**

Prior to re-opening, employers should review current policies and procedures and identify changes responsive to the COVID-19 work environment. If the employer makes changes to its policies and procedures, it should likewise train its employees.

2) **Emergency Response Plans (ERP)**

New rules and laws designed to mitigate the risk of spreading COVID-19 may impact the employer's ERP. For example, physical distancing rules may impact an employer's ERP. At a minimum, employers should update the emergency procedures and contact list and train all employees. Egress plans may likewise need to be modified to include physical distance requirements and new facility layout.

Note: The goal of maintaining six feet / two meters between people would become a secondary consideration if there is a clear and imminent danger requiring an emergency evacuation. Even during this pandemic, emergency egress plans should reflect that moving patrons away from the most urgent hazard is the first order of business.

3) **Housekeeping**

One of the ways to mitigate risk is to ensure that employers maintain housekeeping and waste disposal standards. For example, housekeeping may be adversely affected if production, storage, and waste increase. Employers should consider increasing the frequency of cleaning to keep pace with increased production and/or facility needs.

4) **Hot Work Policy**


Do not allow hot work to be performed in a permit-required area without following all elements of a hot work permit system.

5) **Restarting Utilities and Processes**

Refresher training should be completed for employees starting up the business or the production areas. Allow only qualified persons to turn on utilities or restart processes. Qualified persons may include electricians, plumbers/gasfitters (for fuels), or process equipment operators. The qualified person is more likely to detect and correct abnormal conditions before damage may occur.

6) **Maintenance**

Proper maintenance programs should be in place, even with reduced shift. Annual inspections including thermographic inspections for electrical systems should be in place. Inspection of the fire protection systems should be in place including the inspection of sprinkler systems, fire extinguishers, and standpipes.



Follow a deliberate start-up process that allows time to detect abnormal conditions that could lead to equipment breakdown. Keep in mind equipment breakdown could be accompanied by an ensuing fire.

7) Fire Protection and Impairment Procedures

Avoid un-necessary shut down of fire protection systems. However, for those impairments which do occur, follow all elements of a fire protection impairment program and contact the insurance broker or insurer.

IV. Job Aids and Checklists

A. Health Screening Questionnaire

Name (Print):

Department:

In-Person (Yes/No):

Telephone Call(Yes/No):

Date:

Time In:

IF YOU OR ANY MEMBERS OF YOUR HOUSEHOLD HAVE TRAVELLED OUTSIDE OF CANADA WITHIN THE PAST 14 DAYS YOU ARE NOT PERMITTED TO ENTER THE FACILITY.

Are you experiencing any of the following symptoms with unknown causes?

Fever	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Cough	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Shortness of Breath	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Difficulty Breathing	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Chills	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Have you had contact with any person with, or under investigation for, COVID-19 in the last 14 days?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Have you or anyone from your household travelled outside of Canada?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Office Use Only – To Use if “Yes” Was Answered to Any Question Above

In person, the person being screened was:				
Unfit for work and sent home	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Sent back to work	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Referred to a doctor or Public Health with benefit forms (if applicable)	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
On the telephone, the person being screened was:				
Instructed to remain at home	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Referred to go see a doctor or Public Health and send benefit forms (if applicable)	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Advised they can come to work	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

B. Office Re-opening Safety Checklist

Company Division:		Assessor's Name:	
Building Address:		Date:	
Floor / Suite #		Time:	

Instructions:

In safety engineering, there is what is known as a hierarchy of controls (Engineering, Administrative, Personal Protective Equipment), which are preferred in that order. When a higher-level control is not feasible, the assessor should then review alternative options at the lower levels. For example: if it is not feasible to install a barrier between desks or move desks (engineering), attempt to modify schedules or develop other rules (administrative), followed by requiring employees to use masks (personal protective equipment) as a last resort. That process should be applied throughout this assessment. Note: Physical distancing is 6 feet or 2 metres.

Category:	Elements:	Control Measures:	(Yes/No/NA)	Comments:
Engineering Controls				
Access Points	Building doors (landlord controlled)	Review plans or changes which landlord has implemented to address exposures for common building elements. Are risks adequately addressed through engineering design / redesign?		
	Lobby (landlord controlled)			
	Elevators (landlord controlled)			
	Public bathrooms (landlord controlled)			
	Doors (within company's space)	Are there any economical options to provide for automatic / no touch door opening devices? Consider disposable wipes at doors or hands free openers.		
Desk Configurations	Cubicle wall heights	For any cubicles or desks with low partitions or open desk plans, are there barriers that could be installed economically?		
	Staggered desk locations	Is it feasible to relocate desks or take desks out of service to ensure adequate physical distancing?		
Reception Area	Reception desk	Are there feasible options for physical barriers such as clear plastic / glass screens, or painted / taped spacing guidelines on floors?		
	Restrooms (within company's space)	Evaluate size and layout of restrooms, sinks and/or stalls with limited partitions. Can we feasibly take some fixtures out of service or add barriers?		
	Seating	Is it feasible to remove chairs or mark with caution tape in to maintain physical distancing?		
Conference Rooms	Seating	Is it feasible to remove chairs or mark with caution tape in to maintain physical distancing?		
Break Rooms	Seating	Is it feasible to remove tables / chairs or mark with caution tape in to maintain physical distancing?		

Reduce Occupancy	Staggered work schedules	Is it feasible to have employees arrive at and leave the office on staggered schedules to avoid high foot traffic conditions?		
	Alternating work days or weeks	Is it feasible to have employees alternate days Or weeks in / out of the office. (MWF / TTH) or (2 weeks in and 2 weeks home), etc.?		
	Remote work	Encourage all that can work from home to continue to do so. Reserve office capacity for critical business functions and those employees with home limitations or technology issues. Can all employees who wish to return to the office do so while continuously maintaining physical distancing?		
Visitor & Vendor Management	Visitors	Can visitors be restricted to essential client business meetings?		
	Vendors	Can we reduce non-essential pick-ups / deliveries? Have we provided vendors with rules on physical distancing and obtained acknowledgement from vendors?		
Physical Distancing	Meetings	Is it feasible to limit in-person meetings to the revised and physically distanced capacity of our conference rooms?		
	Restrooms (public)	Have employees been instructed to practice physical distancing? (Do not use sinks immediately next to others, do not overcrowd, etc.)		
	Mailroom	Is it feasible to limit to 1 employee? Can we encourage pick-up /delivery within established drop-off points to limit physical contact?		
Signage	Office signage posted as required	Procurement will develop and provide signs addressing physical distancing and PPE requirements. Locations: main entrance(s), common alternate entrances, reception, break rooms. Will all required signs be posted by the opening date?		
Employee Education	Awareness training	Company to record an employee awareness training module. Will all employees be required to complete It prior to returning to the office?		

Category:	Elements:	Control Measures:	(Yes/No/NA)	Comments:
Personal Protective Equipment				
Face Coverings	Cloth masks (non-medical)	Have options been provided for employees and guests to wear cloth masks or face coverings? We do not currently recommend N95 or surgical masks, as these should be reserved for high – risk professions and would require a respiratory protection program.		
Gloves	Nitrile or other non-porous, disposable gloves	Have options been provided for employees and guests to wear disposable gloves when using common office equipment?		
Category:	Elements:	Control Measures:	Complete? (Yes/No)	Comments:
Cleaning Protocols				
Products to Stock	Hand sanitizer	Refer to Government of Canada guidelines for approved hand sanitizer products If building provides, review supplies to determine appropriateness (consult safety team).		
	Disinfectant sprays / wipes			
	Paper towels	NA		
	Nitrile gloves	NA		
Office equipment being returned	Computers, monitors, printers, headsets, etc.	Request that employee wipe down (with disinfectant wipes) all equipment which was brought home.		
High Touch Areas (must be Disinfected at least daily)	Door handles Elevator controls Bathroom sinks and stalls Coffee makers Water dispensers Microwaves / toasters Vending machines Refrigerator door handles Copiers / scanners Break room tables / chairs Equipment for proposal binding Mail room surfaces Reception areas surfaces Conference / board room surfaces	<u>Contract</u> with third party services (if employees are expected to do it, issue with training, and lack of proper WHMIS, SDS, etc.)		

C. Property Checklist

Several businesses have been shut down and are left vacant (or minimally supervised) during the COVID-19 pandemic. As businesses begin to slowly re-open, it is important to review the condition of the property to ensure damage has not occurred and the property is suitable for operations to resume.

Provide workers preparing the building for re-entry with appropriate training, PPE, and sanitizing equipment to adequately protect them from potential exposure or spread of COVID-19. If new chemicals or disinfectants are brought onto the premise, ensure proper safety data sheets and training is supplied. Verify that the chemicals do not pose a fire hazard that could overwhelm the property's fire suppression system(s).

Note, this checklist is intended to address potential property exposures and is not intended to be a comprehensive return to work document.

General Overview

Business Name:	
Address:	

Description of Operations

Number of Employees:	
Hours of Operation:	

Property and Premise Inspections (exterior)

Are access gates intact and operating properly?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Is perimeter fencing intact?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Are there any noticeable natural hazards (downed/damaged trees, excess standing water, other)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Is there damage to the exterior of building (broken windows, doors, graffiti, other)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Are security cameras intact?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Perform roof inspection (standing water, vegetation, exposed areas, other)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

Property and Premise Inspections (Interior)

Are there any signs of intrusion	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Are there noticeable roof leaks?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Is adequate lighting available?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Is emergency lighting operational?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Is emergency egress unobstructed?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Is fire safety plan posted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Are HVAC systems tested and operational?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Do HVAC filters require replacement?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Are any modifications required to the building prior to re-opening (shielding, barriers, signage, etc.)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Are there any changes to the operations performed within the building?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Has electrical equipment (breaker panels, light fixtures, others) been inspected?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Are there any required jurisdictional inspections required on the boilers / pressure vessels?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

Fire Protection Systems


Was the fire protection systems maintained/inspected while building was vacant?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
If No, is an inspection required?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Was an automatic sprinkler system shut?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
If yes, was an automatic Impairment notification sent to broker/insurers?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Was the fire protection system restored?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Does fire protection equipment (fire extinguishers, hoses, risers, fire pumps, other) appear to be in good condition?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Are fire extinguisher inspections up to date?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

Human Element Programs

Is the emergency response program up to date?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Is the fire safety plan up to date?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Are employees trained on smoking policy / locations?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Does emergency egress plan require physical distancing requirements?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
If elevators on site, are there provisions for physical distancing?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Contractor management program revision (amendment) to review physical distancing requirement?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
New ways (e.g. video) to review maintenance issues?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Review permissible occupancy requirements?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

Training

Have all personnel been retrained with the safe operation procedures including equipment operation following an extended shut down or idle period?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Have newly hired employees been trained with the company safety policy and operation procedures?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Have all personnel involved with Hot Works been retrained with the company Hot Work Policy?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Have necessary maintenance employees been retrained with the automatic sprinkler impairment procedures?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Have all employees been trained on the new Emergency Response Plan?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>



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