

Infrastructure Health and Safety Association Guidance on best practices and workplace responsibilities for the constructor - Responding to a potential COVID-19 exposure

Overview

During the COVID-19 (coronavirus) outbreak, we all need to do our part to keep workers, customers and the public safe and healthy so we can stop the spread and prepare to reopen the province, when we are ready.

Below is a set of resources, tips and best practices to help employers and employees prevent the spread of COVID-19 and work together to reopen the province.

Employers and workers in Ontario have certain duties and rights under the Occupational Health and Safety Act (OHSA) and its regulations. Employers should also review and follow any applicable directives and guidance coming from the Chief Medical Officer of Health and Ministry of Health.

Learn more about:

- [workers' rights](#)
- [employers' responsibilities](#)

Best practices

Recognize hazards and assess risks: The first step to controlling risks in a workplace is to identify the risks. This applies to all workplace hazards, not just COVID-19. Identifying and controlling workplace hazards is required of all employers in Ontario under the [Occupational Health and Safety Act](#) and its regulations.

Some important COVID-19 risk information includes how it is spread and what can increase the risk of a worker becoming infected. COVID-19 can be spread at the workplace in two main ways:

1. person to person – by people who are in close contact
2. by surfaces or objects – when people touch their face with contaminated hands

The level of risk in an activity will be related to the number of opportunities for transmission of the virus. This includes how close people come to each other, how many different interactions there are between people, how often people touch surfaces or objects and how long people stay in a space.

It is possible for COVID-19 to be spread by people who do not have any symptoms. This makes effective control measures very important. We must act as if everyone is infected when setting up controls.

The risk of severe health outcomes is not the same for all workers. The risk increases with age and is higher for people with [certain medical conditions](#).

As the constructor of a project, you have responsibilities for the health and safety of not only your direct employees but to all workers on the project. As such, an absence of clear and concise protocols regarding COVID-19 leaves you and your project at significant risk of infection and total shut down.

Your risk associated with COVID-19 as the constructor extends through your various employers, sub-contractors, sole-proprietors, suppliers and inspectors, whether they are directly working, delivering materials, or visiting the project.

Controls:

Infection prevention and control measures prevent the spread of the virus by breaking the chain of transmission. For example, [public health guidance](#) includes staying at least 2 metres away from others which avoids close contact; washing hands removes the virus and prevents people from touching their faces with contaminated hands.

For COVID-19 in the workplace, it is recommended that employers and business owners conduct a risk assessment to determine the most appropriate controls and actions for a particular workplace/situation. Reference the [IHSA's guide](#) on the risk assessment process to help facilitate this and review [Sample 1](#), [Sample 2](#) for examples.

Always start by considering the most effective controls first. It is best to begin by trying to eliminate the hazard – to remove it from the workplace altogether. Where that is not possible, use multiple engineering and administrative controls first to prevent the spread. Protective equipment (including personal protective equipment (PPE) and community protective equipment) should be relied on only where engineering and administrative controls do not sufficiently reduce the risk to workers.

In addition to the above recommendations, employers should determine whether personal protective equipment (PPE)* needs to be part of their hazard control plan. The need for PPE should be based on a risk assessment taking into account environmental conditions and also take into consideration input from the local public health unit. Although proper use of PPE can help prevent some exposures, it should not take the place of other control measures.

- Workers must use personal protective equipment as required by their employer.
- Workers should be trained on the proper use, care and limitations of any required PPE.

*NOTE: Please be reminded that most face coverings (non-medical masks) have not been tested to a known standard and do not constitute PPE. In some circumstances, face coverings may be used as an effective means of source control, but should not be viewed as an appropriate substitute for physical distancing in the workplace.

Create and communicate policies addressing the following:

- Signs and symptoms of COVID-19
- Communicating the reporting of signs and symptoms to the constructor
- Assessment of workers entering the project (implementation of worker questionnaires)
- How social/physical distancing will be accomplished
- Special work scheduling requirements
- Site sanitization and hygiene

Plan ahead to prevent the potential transfer of the virus between workers.

- Survey all workers entering the site if they have travelled within last 14 days, been exposed to COVID-19 or have symptoms of COVID-19 exposure. Ensure any worker with a positive response immediately leaves site and recommend the worker self-isolates, as noted below.
- Have washroom facilities available for all workers to wash their hands.
- Plan work and work crews to facilitate social distancing where possible, and use PPE where distancing might not be practical. Note: Implement all measures to ensure physical distance and separation between people.
- Ensure sanitizing protocols are in place and implemented as required (based on size of workforce, use of an area, etc.).

Upon learning of a suspected case of COVID-19, you should ensure that all supervisory personnel on the project have implemented the protocols for responding to the situation. You and the employers or sub-contractors on your project share similar responsibilities to protect workers on a project and you should work together. The response can include the following measures:

- Reach out to the employer of the potentially affected worker to learn what measures are being taken and ensure they address your protocol requirements.
- Ensure all potentially affected workers and visitors who may have been in direct contact with the worker with suspected COVID-19 have been informed and asked to stay home and self-isolate if appropriate. The constructor has oversight of all workers on a project, and is responsible to address this with visitors and other trade workers

that are not under the direct control of the potentially affected worker's employer.

- Advise your supervisor about how and what they may say to workers who may have come into contact with the suspected case, taking into consideration confidentiality issues. You may seek guidance on this matter from independent legal counsel and your local public health unit.
- Ensure the locations where the potentially affected worker had been are cleaned and disinfected as appropriate for the circumstances. The COVID-19 virus could potentially contaminate these locations.

Additional measures the constructor should consider taking include:

- Communicate with onsite personnel that a suspected case of COVID-19 has been identified and post this information for all workers to see, in case they are not present for the initial communication.
- Advise workers to be cautious and to stay home and self-isolate if they begin to experience symptoms.
- Post updated notices regarding financial assistance for workers who might be directed to self-isolate due to COVID-19. This may encourage workers to be more forthcoming with their symptoms if they know there is some help to deal with the isolation and lost income.
- Post and communicate any policies and protocols the jobsite is following for the protection from COVID-19.

Evaluate:

Changes to work procedures or practices related to COVID-19 may affect the way you have routinely managed other risks in the workplace. Thus, it is recommended that you consider the various preventative measures on an ongoing basis, and review and adjust accordingly if they are not working as intended or have created new risks or challenges.

Review effectiveness of policies, procedures, or project protocols on a regular basis – adjust when gaps are identified or conditions change. Communicate any changes to workplace parties throughout project and ensure suppliers and inspectors are included in the communication.

Look for opportunities to improve workplace procedures and requirements – assess if there are any bottlenecks with respect to workers congregating in areas (around personnel hoists and elevators, or at break times). Continue to monitor Public Health advisories or other changes to protocols that must be implemented given new information.

Ensure all workers are clear in their responsibility to self-isolate and seek clinical assessment over the phone, either through Telehealth Ontario or by calling their primary care provider's office. If additional assessment is needed, their primary care provider or Telehealth may direct them to receive in-person care options. For Ontario residents, anyone who suspects that they have contracted COVID-19 call: 1-866-797- 0000 or TTY: 1-866-797-0007.

Keep in contact with the employer about the worker's health and ask to share any test results they have regarding confirmation of COVID-19. You may need to share the confirmation of COVID-19 with other workers or employers that were sent home due to this exposure or, if permitted by health officials, inform the other workers they can end their self-isolation.

Resources

Stay updated with daily government updates:

- [Government of Ontario](#)
- [Government of Canada](#)
- [Public Health Ontario](#)

Ontario government and agency-issued resources about COVID-19

Develop your COVID-19 workplace safety plan: Learn how you can create a plan to help protect your workers and others from novel coronavirus 2019 (COVID-19).

[Workplace Safety Plan](#)

The [Ontario Ministry of Health](#) is providing consistent updates on the provincial government's response to the outbreak, including:

- status of cases in Ontario
- current affected areas
- symptoms and treatments
- how to protect yourself and self-isolate
- updated Ontario news on the virus

[Public Health Ontario](#) is providing up-to-date resources on COVID-19, including:

- links to evolving public health guidelines, position statements and situational updates
- synopsis of key articles updating on the latest findings related to the virus
- recommendations for use of personal protective equipment
- information on infection prevention and control
- testing information
- other public resources

Other COVID-19 resources

[Health Canada](#) outlines the actions being taken by the Government of Canada to limit spread of the virus, as well as what is happening in provinces and communities across the country. It also maintains a live update of the number of cases by province.

For more information, visit: ihsa.ca/COVID-19

The [World Health Organization](#) is updating the latest guidance and information related to the global outbreak and spread beyond Canadian borders.

It also provides the most up-to-date information on:

- current research and development around the virus
- a COVID-19 situation “dashboard”
- emergency preparedness measures
- live media updates on the spread of the virus

This resource does not replace the *Occupational Health and Safety Act* (OHSA) and its regulations, and should not be used as or considered legal advice. Health and safety inspectors apply the law based on the facts in the workplace.