

# Infrastructure Health and Safety Association Guidance on fatigue management (for employers) during COVID-19

## 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](#)

You should also regularly check for requirements applicable to your region, such as:

- the provincial COVID-19 Response Framework
- municipal bylaws
- orders from your local public health unit

To help prevent outbreaks, you are encouraged to develop a COVID-19 [workplace safety plan](#). All businesses operating in a region in lockdown are required to have one under provincial regulation.

[Report](#) COVID-19 case(s) in the workplace to the Ministry of Labour, Training and Skills Development.

Note: During the first declared state of emergency exemptions were made to the Federal Hours of Service regulations to support the relief efforts of COVID-19 which increased the potential for driver fatigue. This exemption expired on April 30<sup>th</sup>, 2020 and all federally regulated carriers are expected to be in compliance.

For more information, visit: [ihsa.ca/COVID-19](https://ihsa.ca/COVID-19)

## 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. The key risk factors for COVID-19 transmission include:

- prolonged exposure – spending more time with potentially infected people
- close proximity – working close to others
- crowded places – having more people in a space
- closed spaces – indoor spaces with less fresh air exchange (working indoors is riskier than working outdoors)
- forceful exhalation – activities that cause people to breathe more deeply, such as exercise, speaking loudly and singing

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](#).

**Potential fatigue exposures:** Federally regulated carriers and truck drivers are potentially exposed to the following fatigue risks:

- increased work hours in an isolated environment
- varied hours may lead to an irregular sleep schedule (from what the driver normally has)
- additional stress and pressure due to the immediate need of supplies and increased workload
- long periods of time away from family and friends during the global pandemic.

### 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](#) and [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,

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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 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. Note: If physical distance and separation cannot be maintained, workers should have PPE consisting of surgical/procedure mask and eye protection (goggles or face shield).

- Workers must use PPE 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.

**1. Recognize the signs.** Management, supervisors, dispatch, and operations staff should be aware of the signs of driver fatigue. These include:

- driver saying that they “always feel tired” and/or look exhausted
- yawning
- eyes look sore, heavy, droopy or bloodshot
- their reflexes and reaction time are slow
- driver exhibits signs of impatience or irritability
- driver complains of aching, stiff or sore muscles or cramps
- lack of motivation
- lack of concentration, responses to questions are slow or off-topic
- unable to answer questions

**2. Support their health and wellness.**

- Provide tools and resources to support healthy eating and lifestyle choices.
- Communicate (check in) with the driver frequently.
- Have healthy snacks available at your facility.
- Provide some flexibility for drivers if they need to visit their doctor.
- Ensure your drivers know that their health and wellness is important to you.

**3. Set realistic expectations with the drivers and dispatch.** Drivers may be feeling the added need or pressure to complete a delivery during the pandemic.

- Be realistic with your expectations and provide instructions for dispatch to do the same.

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- Encourage the driver to take regular breaks.
- Stagger start times with drivers. This will also allow for reduced staff at the facility and limited exposure of drivers interacting with each other (so that they can maintain physical distancing).

**4. Encourage your drivers to get a full night's rest.** Drivers need to have a full night's rest and suitable off-duty time.

- Where possible try to keep them on their regular or preferred schedule.
- Ensure that drivers have everything they need to be comfortable.

**5. Be aware of mental fatigue.** Drivers may be experiencing mental fatigue as a result of all of the added pressure and deliveries. Be sure to:

- Reach out to drivers regularly to see how they are doing. Check-ins do not always have to be job related. Call drivers to make sure they are "feeling ok." Calls can be made by management, supervisors, dispatch, safety team, etc., and demonstrate how we are all in this together and supporting each other.
- Provide tools and resources if drivers would like to speak to someone else (e.g., employee assistance programs) and remind them these calls are confidential.
- Encourage your drivers to reach out to their networks and stay connected to their family and friends.
- Remind your drivers to take regular breaks and try reading or listening to something that has nothing to do with COVID-19.
- Remind drivers that they are making a difference and helping our economy and people by providing an essential service.

**Screen for COVID-19:**

[Screening for COVID-19: guidance for employers | Ontario.ca](#)

This document provides employers with an overview of workplace screening for COVID-19 and information to help them make decisions about the use of rapid antigen screening.

Screening helps keep infected workers and others from entering the workplace thereby reducing possible workplace transmission.

- Question-based screening uses information about symptoms and exposures to identify people who may be infectious.
- Rapid antigen screening is used to help identify people who are infectious before they develop symptoms.

To further protect workers and help reduce transmission, workers who have passed screening must continue to follow all public health and workplace control measures including masking and maintaining physical distance.

**Masks:**

Learn more about [using masks in the workplace](#) including how to select, care for and use them to protect workers from COVID-19.

For more information, visit: [ihsa.ca/COVID-19](https://ihsa.ca/COVID-19)

### **Vaccines:**

[COVID-19 vaccines and workplace health and safety | Ontario.ca](#)

This guidance document explains how vaccines work to protect you when you are vaccinated, why COVID-19 workplace control measures need to be maintained even after workers are vaccinated, and some considerations for employers about workplace policies and supporting their workers to get vaccinated.

Workplace controls are measures that employers use to help prevent workers from being exposed to hazards like those posed by COVID-19. Vaccines are a good complement to workplace controls, but cannot replace them. They have different purposes:

- Workplace controls help prevent workers from being exposed to COVID-19.
- Vaccines help protect workers from getting sick if they are exposed.

To protect workers and help reduce the chance of COVID-19 transmission at the workplace, it is important to maintain workplace control measures even after vaccination.

### **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.

[Self-monitor](#) for [symptoms](#) for 10 days after exposure.

## 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

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- 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.

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.