

Infrastructure Health and Safety Association

Guidance on hours of service and 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](#)

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](#).

Introduction to Essential Freight Transportation Exemption: As a result of the COVID-19 global pandemic, truck drivers have been identified as an essential service for our country's economy and business continuity. Canada introduced the Essential Freight Transportation Exemption for federally regulated carriers and drivers who are moving essential COVID-19 supplies and equipment as part of the emergency relief effort. Truck drivers moving essential goods will be exempt from hours of service requirements provided that they give advanced notice.

Potential fatigue exposures resulting from the Essential Freight Transportation

Exemption: With federally regulated carriers and truck drivers working additional hours, they are potentially exposed to the following fatigue risks:

- Drivers face increased work hours in an isolated environment
- Transporting essential supplies and equipment with 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 friends and family 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](#), [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.

- 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.
 - 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.** Even with exceptions being made to the hours of service rules, drivers still need to have a full night’s rest and 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.

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.

Note: This is not a legal document, for full details please review the following: [Essential Freight Transportation Exemption](#) in order to ensure you have the most up-to-date information available.

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:

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

- 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.

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.