COVID-19 Workplace Inspection Procedure for Leaders

June 2021

Purpose

Throughout the COVID-19 pandemic, employees have worked together to continue providing essential services while keeping everyone safe. To protect employees and members of the public from the spread of COVID-19, the City of Edmonton has enacted a Temporary Work From Home Arrangement. As we continue to move through the stages of Alberta's Open for Summer Plan, taking a well-planned and methodical approach is critical to supporting employees' transition back into their original workplaces.

The City of Edmonton's COVID-19 Workplace Inspection Procedure for Leaders provides clarity about safety protocols and processes required in order to safely occupy City buildings. Each building and the operations within may have its own unique safety measures and controls for mitigating the risk of COVID-19, and each building or business unit can use this procedure to identify and evaluate their workplace occupation plan. This ensures consistency throughout all City workplaces, and aligns with the Government of Alberta's reopening guidelines.

Applicability

This procedure applies to all City of Edmonton buildings occupied by City employees, including:

Mostly Unoccupied Buildings
Buildings that have had few or no people working in them during the pandemic. This includes some low rise buildings and all high rise buildings (Edmonton Tower, Century Place, Chancery Hall, MNP Tower, Scotia Place, City Hall). Other facilities that may have been mostly unoccupied include recreation facilities (arenas, recreation centres, pools).

Partially or Fully Occupied Buildings
Buildings that have continued to be occupied throughout the pandemic to support essential services or have relaunched as approved by ELT. These include back-of-house buildings (operation yards, eco stations) and others.

To verify that the controls that may have been implemented throughout the pandemic are appropriate, these buildings need to complete Step 5.
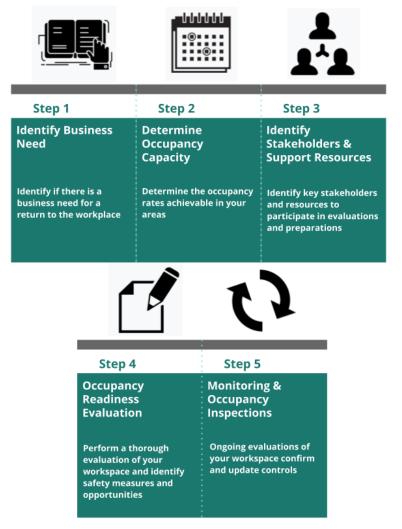
How to use this Workplace Inspection Procedure:

I'm a Leader in a building that is a...	Mostly Unoccupied	Partially or Mostly Occupied (includes those that have since reopened during Relaunch)
High-Rise Building	Carry out each step in this procedure, in consultation with their Property Manager. Property Management has completed the assessment and implementation of COVID-19 controls and safety measures in the *shared spaces* of high rise towers however Branch Managers and Directors are responsible for their assigned space.	Not Applicable
Low-Rise or Operational Buildings	Carry out all of the steps outlined in this procedure.	Complete Step 5 to ensure that existing COVID-19 safety measures are effective.

Many City workplaces are shared between sections or branches and/or with external businesses or contractors, so there may not be a single owner or user of the space.

- In facilities where a specific branch or section is the sole occupant of that facility, the respective Branch Manager or Director is responsible for ensuring that occupancy planning is in place, and implementing COVID-19 controls and safety measures that are effective.

- Where there are multiple City departments, branches or sections working at the same workplace or facility, the parties will work together to assess the workplace for hazards - including COVID-19 - and implement and monitor controls. This follows a similar approach to that of establishing a facility emergency response plan in a location with multiple business areas.

- Where the City leases space in a building that has multiple tenants and external businesses, the owner of the building, through the lease arrangements, is responsible for the spaces not leased to the City. However, the City is responsible for ensuring its leased, occupied spaces are assessed and validated. In this case, the above two scenarios apply.

- In addition, in the case of the City's high-rise office buildings and City Hall, Property Management will perform a lead role in the assessment and implementation of COVID-19 controls and safety measures in the *shared spaces*. High-rise office buildings include Chancery Hall, Century Place, Edmonton Tower, MNP Building and Scotia Place.

Overview of the Process to Occupy City Buildings

Step 1	Step 2	Step 3
Identify Business Need	**Determine Occupancy Capacity**	**Identify Stakeholders & Support Resources**
Identify if there is a business need for a return to the workplace	Determine the occupancy rates achievable in your areas	Identify key stakeholders and resources to participate in evaluations and preparations

Step 4	Step 5
Occupancy Readiness Evaluation	**Monitoring & Occupancy Inspections**
Perform a thorough evaluation of your workspace and identify safety measures and opportunities	Ongoing evaluations of your workspace confirm and update controls

Step 1 - Identify Business Need

Leaders should consider how they will prepare their workforce to return to City workplaces. Rather than directing employees to return to the workplace, this procedure outlines how to do so safely should a business need arise. **All business need determinations should be documented appropriately in case there is a need to review in the future.**

Business areas will determine their strategy for the occupancy of the workplace, based on the continued use of the Temporary Work From Home Arrangement wherever possible. Decision-making factors include:

Workplace Reintegration Plan Phase 1
- Focus is to be on tasks that are required to be completed from the work site (eg. the work requires access to software on site)
- Mental health and wellness considerations

Workplace Reintegration Plan - Phase 2 and beyond
- Job function requirements
- Business/customer needs
- Mental health and wellness (wanting to return to the office)

Business areas will communicate their occupancy plan to their staff. Information for supervisors on how to communicate with staff is provided in the [Employee Reorientation to the Workplace](#).

These questions will help the business area determine if, and who, should return to the workplace:

- Are employees required in the office to access certain equipment not available remotely (e.g. scanning, printing, specific software, replenishment of supplies, etc.)? There may be alternative solutions to accessing technology in the office such as DocuSign or access to applications via a remote desktop solution (RDP). Consider if remote options or solutions are available to replace traditional use of equipment in the office. For assistance, please contact Inside Information.
- Are any employees needed back in the workplace to support service delivery or for other business/customer needs?
- Have any employees specifically asked to return to the workplace?
- Are there special circumstances or unique situations that may arise where employees will be required back in the workplace (e.g. presentations, engagement sessions, in-person training etc.)?

As the business need for returning employees to the workplace is determined, it is important to plan ahead for the transition of employees back into the workplace. All employees are expected to read the Employee Reorientation to the Workplace and leaders are expected to ensure their employees do so at the beginning of this process and again before employees return to the workplace.

Step 2 - Determine Occupancy Capacity

Occupancy thresholds for workspaces can be found in the Employee Reorientation to the Workplace. A workspace's **maximum occupancy** will be limited by that location's ability to meet physical distancing and other safety requirements. Please note that occupancy thresholds are not occupancy targets.

High rise workspace occupancy thresholds are not to be exceeded without approval from the applicable Branch Managers and the Flexible Work Spaces Task Team. Should a business area's need exceed the occupancy capacity of their space, please contact the Flexible Work Spaces Task Team to assist with alternate strategies. Non high rise occupancy thresholds should not be exceeded without careful consideration.

Occupancy relates to the percentage of occupants for the total number of workstations or per the factor that imposes the most stringent limit on occupancy (i.e. washroom or locker room capacity). For high-rises, occupancy relates to the percentage of occupants for the total number of workstations in your business area's assigned space; i.e. if you currently have 20 cubicles and 1 office designated for your team, occupancy would be limited to 2 staff under the 10% threshold and 7 under the 33% threshold. Leaders need to have a method for tracking which employees are working in the workspace and to ensure that the maximum occupancy is not exceeded.

The below questions will assist in determining a safe maximum occupancy.

Workstation Occupancy Assessment Questions
- If physical distancing (2 metre separation) cannot be achieved in current workstation orientation, can we achieve it by restricting the use of certain workstations?
- If any or all of our workstations have sit/stand functionality, does using the stand function make cubicle wall barriers ineffective at containment?
- Are there more effective workspace arrangements that can maximize the number of employees who can safely work there while following physical distancing requirements?
- Are there additional physical barriers that can be installed to create physical separation between employees/clients?

Washroom Occupancy Assessment Questions
- For multi-occupancy washrooms where sinks/urinals do not adhere to physical distancing requirements, can they be partitioned and fixtures made inoperable as needed to achieve a 2 metre separation? This should be considered the primary form of physical separation. Secondarily, washroom stalls may be temporarily closed however worksites must ensure adherence to the Occupational Health and Safety Code for the required number of toilets at a worksite based on numbers of workers present as well as ensuring accessibility for all persons to washroom facilities.

Kitchen/Lunchroom Occupancy Assessment Questions
- For shared kitchen and lunchroom areas that are not designed to ensure physical distancing, what changes can be made to maintain 2 metre separation while in use? (eg. removing chairs, rearranging tables, etc)?

Elevator Occupancy Assessment Questions
- Given reduced elevator capacity can we stagger start, end and break times to limit elevator demand at any given time?
- Can we encourage the use of stairs when considering staff needs and factors such as floor height?

Adjusting return sequence and schedules to enable physical distancing

It is important to look at different options to enable physical distancing when employees return to the workplace.
Leaders should consider:
- Phasing the return over several weeks
- Alternating schedules
- Adjusting start and end times so staff are not arriving and leaving at the same time
- Adjusting break and lunch times so common areas can support physical distancing and cleaning requirements (Appendix A)
- Coordinating with other managers and leaders in your building or on your floor

Consider how the return to the workplace sequence and schedule supports your Rapid Response Plan (Appendix A); such as alternating teams in the workplace on a 2-week rotation to limit the contacts.

Step 3 - Identify Stakeholders and Support Resources

Preparing a facility or workplace for safe occupancy is not a new role or responsibility. Established roles and responsibilities at every level of the organization ensure employees are safe and protected against hazards, including risks for COVID-19.

It is important to examine risks for COVID-19 at each workplace, since all workplaces are different. Performing an assessment ensures that all hazards and risks are controlled and supports communication to employees on how to safely work in that environment.

Once implemented, monitoring compliance and adherence to COVID-19 controls and safety measures is the responsibility of each business area.

Responsibilities of Executive Leaders (Deputy City Managers, Branch Managers, Directors)
1. Assess facilities and workplaces and ensure that effective COVID-19 safety measures and controls are implemented. 2. Ensure that people leaders and support services are adequately supported and have resources to perform their ongoing responsibilities as described in this document.

Responsibilities of Operations and People Leaders (Supervisors, Foremen, Team Leads, Crew Leaders)
1. Assess facilities and workplaces and ensure that effective COVID-19 safety measures and controls are implemented. 2. Ensure that relevant stakeholders are appropriately involved in assessing workplaces and facilities and identifying and implementing safety measures and controls. 3. Monitor, evaluate and improve COVID-19 controls and safety measures at facilities and workplaces. 4. Listen and respond to employee concerns, suggestions and ideas regarding COVID-19 controls and safety measures.

Responsibilities of Employees
1. Be attentive to information, education and training regarding COVID-19 risks and safety measures in the workplace. 2. Contact their supervisor, Joint Worksite Health and Safety Committee member or safety engagement lead/coordinator with any concerns or ideas about COVID-19 risks and safety measures in the workplace. 3. Continue to report Unsafe Work Observations and Near Misses related to COVID-19 using the established Incident Data Collection (IDC) process. 4. Follow posted or communicated workplace and facility rules, guidelines and best practices for their protection and the safety of others.

Responsibilities of Support Services*
1. Provide support and guidance in the assessment and ongoing evaluation of facilities and workplaces to protect employees against COVID-19. 2. Respond to concerns, ideas and questions related to COVID-19 risks and safety measures.

Support Services may include Workforce Safety & Employee Health, Communications & Engagement, Custodial Services, Facility Maintenance Services, Corporate Security, Enviso, etc.

Responsibilities of Property Management
1. In the case of the City's high-rise office buildings and City Hall, Property Management has completed the assessment and implementation of COVID-19 controls and safety measures in the *shared spaces*. High-rise office buildings include Chancery Hall, Century Place, Edmonton Tower, MNP Building and Scotia Place. 2. In the case of the City's low-rise buildings, Property Management may serve as a stakeholder to the business areas throughout this procedure.

Consider engaging the following stakeholders in conducting the occupancy readiness evaluation (Step 4).

- Business unit and program managers
- Communications and Engagement
- Workforce Safety and Employee Health
- Facility maintenance services & custodial services
- Property management
- Corporate security
- Joint worksite health and safety committee member(s)

Additionally, identify third-party stakeholders who may be impacted by occupancy, such as mail and courier services, CPSS, cleaning staff and representatives from other businesses within the facility that should be kept up to date with changes.

Step 4 - Occupancy Readiness Evaluation

To prepare for a return to workplaces, conduct an occupancy evaluation. The goal of evaluation is to assess the space for any COVID-19 controls already in place, and to determine whether further actions and controls are needed for a safe occupancy.

There are many ways to complete a successful evaluation, and business areas are encouraged to do what works best for each workspace and its participants. The information below provides a basic overview of some key points.

1 - Planning the evaluation
Before occupancy occurs, or before moving between phases of the Workplace Reintegration Plan, an occupancy evaluation is required. Advanced planning will make your evaluation more productive. Some buildings are small and may not require much planning, while some are quite large and will require more.

- Plan a route for the evaluation, or break the floor plan into smaller sections.
- Use a facility map, floor plan or seating plan if available.
- Identify a person to facilitate the evaluation, or break the group into smaller subgroups and work on individual items or sections.
- Review the COVID-19 360 Physical Distancing Checklist and other resources (Appendix A) to know what to look for, and what kinds of controls might need to be implemented.
- Consider user experience and cover all areas employees will occupy or access.
- When installing signage, consider if there are unrelated, outdated posters or signage in the workplace that could distract employees from noticing COVID-19 related signage. Where appropriate, remove excess or outdated posters.

The team will use the COVID-19 Occupancy Readiness Evaluation Template to record findings during the evaluation, and to collect recommendations and assign actions.

2 - Performing an evaluation

Observations and recommendations will determine readiness for occupancy. This is where you will identify any issues with returning to the workspace and seek out solutions to problems or challenges that have been identified.

Note all observations on the [COVID-19 Occupancy Readiness Evaluation Template](#).
- List items that need consideration under the observations column and try to include as much detail as possible. For example, "the four hoteling stations are located too close to each other (approximately 3' separation.)"
- Note any possible controls or solutions for observed problems in the recommendation column. For example, "Close two of the hoteling stations with signage, remove chairs and unplug the monitors."
- For problems without an obvious resolution, describe the issue and take it to the rest of the group for review and input.

3 - Finalizing the evaluation

A successful evaluation is a collaborative effort between operational experts, stakeholders and support resources. This process should lead to the best solution for both the workplace and employees.

- After the evaluation is complete, provide all stakeholders a copy of the evaluation form and give them an opportunity to review and provide feedback.
- Discuss the observations and recommendations among the group, either in a group conversation or by opening up commenting in a shared document.
- After everyone has reviewed the evaluation and provided feedback, the team can begin to act on recommendations to prepare the space for occupancy.

4 - Action items

The purpose of an evaluation is to adjust the workspace to protect employees' health and safety. Recommendations and adjustments must be completed before employees can occupy the workspace.

After the COVID-19 Occupancy Readiness Evaluation Template is complete and you are ready to act on its recommendations:
- Assign the action(s) to a specific person.
- Assign a reasonable deadline that aligns with target occupancy dates.
- Have each person confirm that they have completed any assigned actions.

After findings have been verified and accepted by the identified stakeholder group and COVID-19 controls have been implemented:
1. Share all applicable evaluation documents with leaders, employees and members of the Joint Worksite Health and Safety Committees for their awareness and understanding of risks and controls.
2. Log the evaluation as an "inspection" in the Safety Data Management System (note: name the inspection as "COVID-19 Occupancy Readiness Evaluation - <Building Name> - <Floor #> - <Date of Completion>". Action items from each evaluation are to be logged in SDMS for record keeping and tracking purposes.
3. Post a hard copy of the inspection in each workspace for future review and updates.

Additional Evaluation Considerations

COVID-19 Safety
It is important to conduct evaluations in a safe manner, following appropriate safety protocols.
- Employees who participate in an evaluation on a City workplace must complete a Pre-Shift Screening prior to arriving.
- The person leading the evaluation should provide participants with the [Pre-Shift Screening form](#) prior to attending the evaluation and remind them to wear face coverings or masks.
- Participants are expected to wear a [face covering](#) during the walkthrough evaluation.

> **Building accessibility**
> COVID-19 has changed the way employees access some office buildings. Keep in mind that:
>
> - Site access may not be the same as it was prior to COVID-19, so remind employees to plan accordingly and bring the appropriate keys, card swipes, etc.
> - Some participants' parking passes may be on hold - remind participants to arrange for alternate transportation or parking arrangements.
> - Select a meeting spot that everyone will have access to, or provide instruction on who/how to gain access.

Following completion of Step 4, leaders will begin the staged process of returning employees to City workspaces according to business needs, in alignment with the Employee Reorientation to the Workplace.

Leaders must ensure that employees returning to the workplace have reviewed the Employee Reorientation to the Workplace. Although employees may have reviewed the Reorientation in September 2020, it is important to read through it again now that they are returning to the workplace.

Please note: many employees who are participating in the City's Temporary Work From Home Agreement will slowly reintegrate into the workplace during Phase 2.

Step 5 - Monitoring & Occupancy Inspections

Planned safety inspections are an important part of the City's Safety and Employee Health program and an existing responsibility of leadership as outlined in the City of Edmonton's Inspection Standard.

Monitoring the effectiveness and compliance to controls identified in Step 4 will be completed during inspections. Ongoing inspection of facilities for COVID-19 hazards and controls will become part of the existing workplace inspection program.

Post occupancy inspection of facilities and workplaces will:

- Identify potential, unforeseen problems or deficiencies with COVID-19 controls identified in the pre occupancy evaluation;
- Examine potential unintended negative consequences or impacts of controls;
- Identify new COVID-19 hazards and/or the need for new or additional controls to existing hazards; and
- Reinforce and validate that existing COVID-19 controls are effective.

Inspections should involve collaboration between:

- Leaders
- Employees
- Joint Worksite Health & Safety Committee member(s)
- Safety Engagement Lead, as required

Other stakeholders that should be involved in inspections may include those who participated in the initial building assessment (refer to Step 3 above).

The following table outlines inspection requirements for:
- leaders with employees who have returned to the workplace following Step 4; and
- leaders in a partially or mostly occupied low rise building (as per the table in the Applicability section).

Position and Area Type	Timeframe for completing initial Occupancy COVID-19 inspection
Branch Manager (or equivalent) of an industrial or operating area with medium or high hazard activities	Within 30 days
Branch Manager (or equivalent) of an area with only low hazard activities or an area that is administrative in nature	Within 30 days*
Director (or equivalent) of an industrial or operating area with medium or high hazard activities	Within 14 days
Director (or equivalent) of an area with only low hazard activities or an area that is administrative in nature	Within 14 days*
Supervisor (or equivalent) of an industrial or operating area with medium or high hazard activities	Within 7 days
Supervisor (or equivalent) of an area with only low hazard activities or an area that is administrative in nature	Within 7 days*

*In some locations, there may be many managers/supervisors. It may not be necessary to have multiple inspections of the same area by different supervisors. It is at the discretion of management or supervision to rotate and take turns conducting safety inspections. The Safety Engagement Lead must be consulted prior to altering inspection requirements.

Documented post occupancy inspections are required for evaluating transitions to the subsequent phases within the Employee Reorientation to the Workplace. This ensures that lessons and best practices learned from initial phases are applied to subsequent phases of reintegration.

For now, both a general inspection form and a COVID-19 inspection form will be used for the ongoing, follow up inspections.

Inspection findings must be communicated to affected persons, including employees who work in the space and those who own and manage the controls. Leaders are expected to champion adherence to the controls and to educate about and reinforce the need to follow the controls, where necessary

Link Resource:
1. **COVID-19 Inspection Checklist**
2. **General Inspection Form**
3. **COVID-19: Alberta OHS Inspection Checklist**
4. **City of Edmonton Inspection Standard requirements, roles and responsibilities**

Ensure completed inspection forms are uploaded into the Safety Data Management System

Appendix A - Additional Resources

COVID-19 Hazard Assessment

What is the COVID-19 Hazard Assessment?

Each department has a COVID-19 hazard assessment that outlines risks and controls to protect against COVID-19. Hazard assessments are reviewed regularly and must be shared with employees for their review prior to starting work or returning to the workplace (where applicable) and regularly as it is updated.

Additional Resources:
1. **City Operations and Integrated Infrastructure Services COVID-19 Hazard Assessment**
2. **Citizen Services and Non-Operational Department* COVID-19 Hazard Assessment**

*Includes: Office of the City Manager, Employee Services, Financial and Corporate Services, Urban Form and Corporate Strategic Development, and Communications and Engagement

Physical Distancing

Why is Physical Distancing Important?

Physical distancing can prevent the spread of COVID-19 and limit the number of people who are sick at one time. Practicing physical distancing is a measure we can all take and it helps to protect not only yourself, but others too.

Additional Resources:
1. **COVID-19 360 Physical Distancing Checklist**
2. **COVID-19 Signage Resources**

Pre-Shift Screening

Why is Pre-Shift Screening Important?

The City of Edmonton has established a COVID-19 Pre-Shift Screening Checklist to help determine fitness for work during COVID-19 and help minimize the spread of the virus.

All employees working at City of Edmonton sites are required to complete a pre-shift screening prior to starting their shift. For example, prior to leaving to work from home, an employee would complete the pre-shift screening checklist and determine if they are fit for work or not. Pre-Shift Screening is a control that every employee can use to monitor if they have symptoms and help keep others safe by staying home when they are sick.

Additional resources:
1. **COVID-19 Pre-Shift Screening Checklist:**
   a. **Printable Form** (8.5 x 11)
   b. **Electronic Form** (can be completed through a desktop, tablet, or smartphone)
2. **Supervisor Toolkit for Pre-Shift Screening and Rapid Response**

Rapid Response (responding to symptomatic individuals in the workplace)

Why do we require a Rapid Response?

The City of Edmonton has a responsibility to ensure that employees who may be symptomatic in the workplace are assisted to ensure they remain isolated from others and that they have safe transportation to their home for isolation.

If employees are showing any type of COVID-19 symptoms they should stay at home. However, if they develop symptoms of COVID-19 while at work, they should leave the workplace immediately (wearing a mask if possible) and maintain strict physical distancing from others.

Supervisors need to know what the rapid response plan is and be ready to implement it should an employee develop symptoms at the workplace. Employees should also be familiar with the rapid response plan and what to do if they start feeling sick while at the workplace.

A business area should be prepared to assist with responding to a potential exposure by having a way to determine who has been in contact with a person who has tested positive for COVID-19 in the 2 days before they became symptomatic. Therefore, your planning for occupancy should include a record of employees who are in the workplace (only required to be kept for 2 weeks at a time). If there are contractors or other workers on site the business area should ensure that a contact with that organization is also keeping a record of their employees and can provide that information as needed.

Additional resources:
1. **Supervisor Toolkit for Pre-Shift Screening and Rapid Response**
2. **Rapid Response Flowchart** (**Printable version**)
3. **COVID-19 Contact Tracing & Employee Self-Isolation**

Cleaning and Disinfecting

Why is Cleaning and Disinfecting Important?

COVID-19 spreads from an infected person to others through respiratory droplets and aerosols (smaller droplets) created when an infected person talks, coughs or sneezes. COVID-19 can also spread by touching something that has the virus on it, then touching your mouth, nose or eyes with unwashed hands. You can transmit COVID-19 before you start showing symptoms or without ever developing symptoms. Cleaning and disinfecting frequently touched surfaces/shared surfaces and tools is a best practice measure for prevention. Even though our custodial staff have additional cleaning and disinfecting measures to be arranged with, it is our responsibility to take additional steps to keep ourselves and others safe.

Link resource:
1. **Standard Procedure - Cleaning and Disinfecting High Touch Surfaces**
2. **COVID-19 Critical Supplies Process**

Community Protective Equipment (Face Coverings)

Why is Community Protective Equipment Important?

Community Protective Equipment related to COVID-19 will typically be in the form of a face covering. A face covering is a material or mask that covers a person's mouth, nose and chin and prevents the spread of respiratory droplets to others by controlling the hazard at the source.

Examples include:
- Cloth face coverings
- A non-medical face mask
- A medical-grade face mask
- Face shields that wrap around the face and chin, fully covering the mouth, nose and chin

Link resource:
1. **COVID-19 Mask Selection Guide**
2. **How to wear a non-medical mask poster**

Hygiene Practices

Why Promote Good Hygiene Practices?

Good personal hygiene has become even more important in today's environment for both health and social reasons. Keeping your hands clean is vital in stopping the development and spread of illness and infection. This simple habit doesn't just benefit your health – it can help protect those around you too.

Link resource:
1. **AHS - Hand Hygiene - Infection Prevention & Control**
2. **City of Edmonton COVID-19 Posters**
3. **Hygiene Signage:**
   a. **COVID-19 Prevention Tips**
   b. **Cover Your Cough**
   c. **How to Hand Wash**

Emergency Response Plans (ERP)

Why Should We Review Emergency Response Plans?

Re-occupancy may have an effect on an ERP that was developed with the idea of a building being at full to near full occupancy.
- Ensure the ERP is up-to-date given the changes in occupancy
- Ensure it reflects the people and positions that are identified in the plans
- Ensure you have capacity for an appropriate response with the current numbers in your office building
- Due to limited occupancy, there may not be a fire warden in your area at all times. It is important that the updated Emergency Response Plan for the facility is shared with all employees returning to the workplace.

Where there are multiple City departments/branches/sections/work units working on the same site, the group that is primarily responsible for acting as the employer representative regarding the operation of the facility will be responsible for developing the ERP. Contact your Joint Worksite Health and Safety Committee with any changes that should be made to the ERP.

Link resource: **Emergency Response Procedures**