

Implementing OH&S in Schools and Division Worksites

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Implementing OH&S in Schools and Division Worksites

Overview

The implementation of a successful Occupational Health and Safety Program is a significant undertaking for your school and other Division facilities. Not only is it required by regulation, but experience has shown that where there is an effective focus on health and safety issues, employees are more productive and do higher quality work.

Involvement of employees is the key to successful implementation. Every employee has a role to play. Some will take responsibility for specific parts of the health and safety program. Others will assist, for example, with inspections. Above all, everyone needs to work in a way that protects not only their own health and safety but also the health and safety of colleagues, students and members of the general public who might be present in the facility from time to time.

In this section, detailed guidelines are set out for getting started and for maintaining due diligence on an on-going basis, including action plans, employee involvement and monitoring and compliance.

The Board of Trustees and the Superintendent are committed to meeting all requirements of the Occupational Health and Safety Act, Regulation and Code and other relevant acts and codes and shall provide the resources for achieving this objective.

Getting Started (Establishing Due Diligence)

How to Use This Manual

This manual consists of multiple sections, codes of practices and guidelines, information on sources of safety training, a glossary and an index. Most sections are organized as follows:

- Overview
- Legislative Requirements
- Guidelines for Meeting Legislative Requirements
- Training Requirements
- Implementation Process

Each section provides the information needed to establish and maintain on an on-going basis, a compliance program for the topic under discussion.

Section	Read this section to find out about:
1. Introduction	The scope and purpose of the manual.
2. Implementation	The steps required to implement a health and safety program to ensure due diligence.
3. Hazard Assessment & Control	Hazard assessment and control techniques to assure due diligence on an on-going basis.
4. Emergency Preparedness	The legislated and Division requirements for emergency preparedness.
5. First Aid	The legislated and Division requirements for first aid.
6. Chemical Hazards	The legislated and Division requirements for use, storage, handling, disposal and transport of hazardous chemicals.
7. Personal Protective Equipment	The legislated and Division requirements for personal protective equipment.
8. Hearing Conservation	The legislated and Division requirements for hearing conservation.
9. Confined Spaces	The legislated and Division requirements for confined spaces.
10. Infection Control	The legislated and Division requirements for infection control.
11. Employee Safety & Security	The legislated and Division requirements for ensuring the safety and security of employees.
12. Accident/Incident Reporting and Investigation	The legislated and Division requirements for accident/incident reporting and investigation. Reporting and investigation to assure due diligence on an on-going basis.
13. Safe Work Practices	Safe work practices to assure due diligence on an on-going basis. Codes of Practice and Guidelines: Codes of practice that must be used for confined space entry, respiratory protective equipment, and asbestos abatement.

14. Third Party Contractor Adherence

The legislated and Division requirements for contractor adherence.

All principals and non-school based department heads are expected to review the **overview**, **legislative requirements** (if applicable) and **implementation** areas of all applicable sections. Most sections will apply to every facility; however, not all sections will apply to the same degree. For example:

- A senior high school will need to have a comprehensive chemical hazards program to cover science labs, CTS and custodial activities.
- An elementary school will need to cover the chemicals used by custodians, plus a limited number of chemicals used by teaching and support staff.
- A maintenance facility will not need to be concerned about infection control to the same degree as a school.
- Maintenance staff and CTS staff will have to be particularly concerned about hearing conservation, because they are more likely to be exposed to high noise hazards, e.g., working with power tools.

Implementation summarizes, for the Superintendent, principal or non-school based department head, the major tasks that must be carried out to assure due diligence.

Responsibility of the Principal or Non-School Based Department Head

In deciding which topics to be concerned with, it is helpful to remember that, a principal or non-school based department head represents the Superintendent and is responsible for the health and safety of all employees, students and workers who are present and working in the facility at any given time. This includes:

- Employees who work in the facilities on a regular basis.
- Division employees who are working at the facilities from time to time, e.g., maintenance staff, supply staff, hourly staff.
- Employees employed by contractors who are working at the facilities, e.g., electricians.

Note: This issue of contractor staff is dealt with in more detail later in this section, under Responsibility for Contractor Workers.

Some Suggestions for Developing an Occupational Health and Safety Program at Schools and Division Facilities

An effective Occupational Health and Safety Program at your school or facility is a major undertaking. However, following these suggestions, will assist in ensuring compliance in this area.

- You may already have made a good start in some areas, e.g., first aid, training or WHMIS. Review the relevant sections in your manual and expand upon or revise your plans.
- The manual is designed to help you implement your program. It contains “off-the-shelf” materials that you can take and use as is, or modify to your own requirements.
- Safe work practices have been developed for particularly hazardous tasks, e.g., working with a table saw, working with acids (see Section 13 Safe Work Practices and the Safe Work Practices Manual). These materials will provide an excellent resource in ensuring that employees are following appropriate procedures when performing hazardous tasks.
- In each section of the manual, materials (including forms and procedures) are available for your use, e.g., hazard identification.
- Where you do not have all of the resources you need, specialist training and information services are available. Please refer to the Division’s Designated Safety Officer for the issue concerned e.g., CTS - Supervisor CTS.
- Aim to achieve due diligence systematically. Initial emphasis should be on getting the building blocks in place. Start by making a plan. Focus on high-risk areas. Prioritize goals, then start to work on them one at a time.
- Use your employees to the fullest extent possible. Delegate responsibilities. Every facility in the Division contains employees with valuable knowledge, expertise and/ or interest in the different areas in which you must establish compliance. It would be extremely difficult to achieve compliance in such areas as science, CTS and caretaking without direct involvement of employees from these areas.

Employee Involvement

While the superintendent, principal or non-school based department head has overall responsibility for the Occupational Health and Safety Program in Division facilities, experience has shown that the program will be more successful with employee involvement. Advantages of involving employees include:

- Sharing the work load.
- Engaging employees who have been working on parts of the Occupational Health and Safety Program to help identify the current status and deficiencies. They can also help in prioritizing activities.
- Engaging employees who are responsible for a part of the program to take “ownership”, so the program will be more successful.
- Engaging some employees who may have particular expertise or knowledge that you want to draw on, e.g., a science teacher might be a good choice for dealing with chemical hazards.

Strategies for Employee Involvement

Two different ways of involving your employees are:

1. Delegate responsibility for the program to an advisory group.
2. Coordinate the program and delegate specific tasks.

Set up a Joint Health Site Committee

Delegate the coordination of Occupational Health and Safety Program to the committee. For example, the committee group could:

- Review all areas for compliance,
- Assign detailed responsibilities,
- Conduct surveys, investigations and inspections, and
- Set up an emergency preparedness program.

The committee would make recommendations to the principal or non-school based department head on key issues but take over day-to-day coordination of the Occupational Health and Safety Program.

This approach ensures widest involvement of employees in the program. However, the principal or non-school based department head remains accountable.

Coordinate the Health and Safety Program

The other option is to take responsibility for the overall program, and delegate specific responsibilities to selected employees.

With this approach, the principal or non-school based department head is the program coordinator, and acts very much in a “hands-on” basis. This approach will require a greater commitment of time and effort than using an advisory group.

Developing an Action Plan

Here are some suggested steps to begin implementation of an Occupational Health and Safety (OH&S) Program:

1. Read the Manual, and decide which sections apply. Every school must have an emergency response plan, but not every school will need a confined space program.

The principal or non-school based department head does not need to read each section in depth. Familiarity with the main topics, legislated and Division requirements and the basic steps needed is a starting point. Read the Overview, Legislative Requirements, Training Requirements and Implementation sections of each relevant section.

If you need more guidance or direction, contact your Principal.

2. Evaluate where the school or facility is with respect to meeting legislative and Division requirements.

Establishing a program for one or more of the areas requiring attention may have already occurred. If so, don't go back to square one and start all over again. Evaluate the program you have or have started, and build on it.

3. Decide employee roles:

- Form an employee advisory group and delegate the task.
- Coordinate the whole program yourself and delegate specific tasks to given individuals.

(See preceding topic for more information on these options.)

4. Deliver or facilitate a safety orientation for all employees. The amount of time to do this depends upon the size and complexity of your operation and potential workplace hazards. A standardized orientation can be found in our SchoolWorks site and includes topics such as:

- Introduction to Occupational Health and Safety.
- Responsibilities of the employer and all employees. Note: This issue is dealt with in more detail later in this section, under *Employee Responsibility for Health and Safety*, page 11.
- Right to refuse an unsafe task. Note: This issue is dealt with in more detail later in this section, under *Refusing Unsafe Work or "Imminent Danger"*, page 11.
- Overview of key topics: summarize legislative areas, explain how accidents happen, accident reporting, stresses importance of hazard identification and evaluation, and ensure competency and training and what to do if an accident occurs.
- Training requirements.

After the safety orientation, there should be the development of a first draft of an action plan.

5. Work with employees to develop a detailed plan for each major topic that affects your school or facility. The plan should include:

- **Goals:** What is to be achieved by when?
- **Responsibilities:** Who will be responsible for achieving each goal?
- **Indicators of success:** How you will know if/when the goal has been achieved?
- **Training required for employees:** This should include training for the employee who will be responsible, as well as training for employees who carry out the activity. For example, the employee in charge of chemical hazards should have training in WHMIS.
- **Monitoring and reporting:** How you will know if the legislative and Division requirements are being met on an on-going basis?

6. Get Started.

Occupational health and safety is just one of your many responsibilities. It is important to recognize, however, that the Division may not be fully in compliance with existing regulations. If you are subject to a workplace inspection by Alberta Labour, you may not have all the pieces in place but if you have a plan that you are working on diligently, the inspector will most likely look favorably on your operation.

The worst thing you could do is to put this manual aside, intending to work on it at a more convenient time.

Example: Developing an Action Plan for First Aid Training

Here are the steps that you could follow to develop an action plan for a first aid program.

1. Read Overview, Legislative Requirements and Implementation areas of Section 5: First Aid.
2. Assign responsibility for first aid to an employee. Ideally, this would be someone who is interested in this area, e.g., education assistant, physical education teacher, laboratory technician.
3. Agree what the role of this employee will be, together with a plan of action. Timelines and dates for reporting back should be included in the action plan.
At this point, you can pass the responsibility to the employee.
4. The employee should review the full section on first aid, with particular focus on the guidelines and on training requirements.

The employee should then assess current compliance with respect to availability of certified personnel, emergency conveyance, equipment and supplies; signage; record-keeping; and other requirements. Questions that should be addressed include:

- Who is trained? to what standard? is training current? are all trained persons certified? are sufficient trained people available? is a record kept of first aid personnel?
 - Are adequate procedures established for administering first aid?
 - Is an emergency conveyance readily available? if not, have alternative arrangements been made?
 - Are the required number of kits, supplies and other equipment available? do the kits have required contents and are they replenished or renewed as required?
 - Are accurate and complete records of first aid incidents maintained?
 - Is required signage posted?
5. Deficiencies should be noted, and a plan to bring all deficient areas up to full compliance detailed. This plan should indicate estimated costs.

Based on the outcome of this project, the first aid area can be brought into compliance.

Remember that documentation is a critical aspect of due diligence. A record of the evaluation together with findings and recommendations and action taken should be kept, even if the evaluation indicates that the first aid program is fully in compliance.

Demonstrating Due Diligence (On-going Activities)

Experience has shown that a successful Occupational Health and Safety Program requires continued focus and commitment. Even though you will make remarkable progress fairly quickly, it takes most organizations many years of hard work before they can truly say that they are doing everything that is reasonable in the circumstances to protect the health and safety of employees.

A major reason for this is that due diligence usually requires a change in culture in the way people think about how they do their jobs. Employees must learn to think differently about the way they work. The object is not just to get the job done, but to get it done safely. Employees must learn to stop and think before they start a task - What are the hazards? What precautions can be taken to reduce the risk? How can colleagues and other employees who might be in the vicinity be adequately protected?

Eventually, you will find that employees pro-actively pursue safety. Here is a good test:

When someone sees a fellow employee working unsafely, e.g., taking a short cut that might endanger their health and safety or the health and safety of others, do they intervene and suggest a safe work procedure, or do they look the other way?

When your employees begin to help each other in a positive, constructive manner, you will be well on your way to achieving due diligence.

You can start, in your safety orientation, by making employees aware that they are responsible, under the Occupational Health and Safety Act, for their own safety, as well as for the health and safety of others.

Achieving Due Diligence

Major activities that ensure that your program is always improving include:

- Monitoring and Compliance.
- Contractor Safety.
- Safety Orientation for New Employees.
- Ensuring Competency.
- Documentation.
- Site Evaluations.

Monitoring and Compliance

The superintendent, assistant superintendent(s), director of business and operations, principal or non-school based department head is responsible in the final analysis for ensuring that the

Occupational Health and Safety Program in their facility is successful. Here are some things you can do to assure compliance on an ongoing basis.

1. To help keep the focus on health and safety, put it on the agenda for every staff meeting. If someone brings up a health and safety concern, e.g., the air quality in a CTS shop, treat it seriously. Make employees feel comfortable about discussing health and safety issues. Make it an expectation that health and safety issues get brought to the forefront and get dealt with promptly.
2. Review the plans of all employees who take on responsibility for health and safety at your facility. Go over their plans with them and review progress regularly. In this way, you make sure the program has the right focus and direction.
3. Make sure that health and safety is considered for unusual activities. If some building work or maintenance work or grounds work is going on at your school or facility, make sure that relevant health and safety issues are dealt with before the work begins.
4. The Division will advise principals and non-school based department heads of any changes to the Occupational Health and Safety Act and Regulations and how the changes affect the Division.
5. Be sure to communicate regularly with your colleagues. Share information. If you learn an important lesson from a chemical spill that occurs in a lab at your school, make sure that others in the Division are aware, so that they can take appropriate precautions.
6. Review your Occupational Health and Safety Program regularly to make sure that all on-going elements are working as they should, particularly:
 - **Emergency preparedness:** Are plans updated as required, to reflect changes, e.g., are students' home phone numbers current? Are drills conducted regularly, to keep emergency responders in an adequate state of readiness?
 - **Hazard identification and control:** Are all hazards being identified, evaluated and dealt with appropriately? Are inspections conducted regularly, and are recommendations dealt with promptly?
 - **Accident/incident reporting and investigation:** Are all employee accidents reported to appropriate authorities, as required? Has a near-miss incident reporting system been set up and is it working effectively? Are near-miss incident statistics being evaluated and analyzed and are appropriate actions being taken?
 - **Environmental protection:** Are all releases being reported? Is hazardous waste being properly identified, stored and disposed of?
 - **Safe work practices:** Are safe operating procedures being developed for hazardous jobs? Are employees trained as required in these procedures?
 - **Training:** Are employees trained as required? Are training records kept? Is refresher training conducted as required? Are all new employees given safety orientation training?
7. Make sure you are informed of all health and safety incidents and issues.
8. Make sure that all reports required by Alberta Human Resources and Employment and other government agencies, e.g., serious accidents, lost-time accidents, noise surveys, releases of substances that are harmful to the environment, are filed as required.

Responsibility for Contract Workers

The Alberta Occupational Health and Safety Act, Regulation and Code sets out the basic responsibility of the employer (or employer's representative) for Division employees and for staff employed by other employers (i.e., contractor workers) who are present at the Division facility:

2(1) Every employer shall ensure, as far as it is reasonably practicable for him to do so,

(a) the health and safety of:

- (i) workers engaged in the work of that employer, and
- (ii) those workers not engaged in the work of that employer but present at the worksite at which that work is being carried out.

In most cases, the owner of a worksite is the employer, e.g., the Division takes on the responsibility for health and safety of all workers present at the worksite. Division employees (e.g., Construction and Maintenance Department) shall have the primary role of monitoring contract work. Principals and non-school department heads shall report any concerns they have regarding contract workers to the appropriate Construction and Maintenance staff.

Assuring due diligence for contractor staff is different from assuring due diligence for your Division, because contractor staff have their own supervisors and they are employees of a different organization. There is not the same degree of control over them, with respect to training or safe work practices, as there is over the employees of the Division.

No school shall enter into contract arrangements without prior approval of the Division Superintendent, Corporate Treasurer, or the Director of Business and Operations or initiate renovations without prior approval of the Division Director of Business and Operations.

Here are some specific things that must be done to ensure due diligence for contractors:

- Make sure the contractor has a safety program that comes up to the standards of the Division's Occupational Health and Safety Program before hiring. This should be a condition of awarding the contract. Evaluate the contractor's safety program by interviewing the contractor (or safety representative), looking over their safety manual, checking their accident record with WCB, getting references, etc.
- Before contractor workers begin work at a Division facility, clearly identify the specific hazards in the workplace to which contract workers will be exposed. Identify relevant safe work practices and procedures that contract workers are expected to follow on the worksite (e.g., brief the contractor workers on procedure for evacuation of the school).
- Review with the contractor that workers have been adequately trained.
- Monitor the safety performance of contractor workers. Make expectations of Occupational Health and Safety performance very clear to the contractor and workers. As soon as it becomes clear that expectations are not being met, (e.g., the worker is not using recommended personal protective equipment) immediately stop the work and bring the problem to the attention of the contractor's representative. If a positive

response is not received, discharge the contractor or specific workers who are causing the problem from the worksite.

- For more details related to responsibility for contract workers see Section 14 *Third Party Contractor Adherence*.

Worker/Employee Responsibility for Health and Safety

The Alberta Occupational Health and Safety Act, Regulation and Code also sets out the basic responsibility of all employees for their own health and safety and for the health and safety of their fellow employees:

5 Every worker shall, while engaged in an occupation,

- (a) take reasonable care to protect the health and safety of the worker and of other persons at or in the vicinity of the work site while the worker is working,
- (b) cooperate with the worker's supervisor or employer or any other person for the purposes of protecting the health and safety of
 - (i) the worker,
 - (ii) other workers engaged in the work of the employer, and
 - (iii) other workers not engaged in the work of that employer but present at the work site at which that work is being carried out,
- (c) at all times, when the nature of the work requires, use all devices and wear all personal protective equipment designated and provided for the worker's protection by the worker's employer or required to be used when worn by the worker by this Act, the regulations or the OHS code,
- (d) refrain from causing or participating in harassment or violence,
- (e) report to the employer or supervisor a concern about an unsafe or harmful work site act that occurs or has occurred or an unsafe or harmful work site condition that exists or has existed,
- (f) cooperate with any person exercising a duty imposed by this Act, the regulations and the OHS code, and
- (g) comply with this Act, the regulations and the OHS code.

This topic should be addressed during the employee safety orientation.

Right to Refuse Dangerous Work

Workers have the right to refuse dangerous work and are protected from reprisal for exercising this right:

- workers must continue to be paid while a work refusal is being investigated
- employers must ensure workers understand the hazards at the workplace, know what needs to be reported and have the support to exercise their right

- employers must investigate the matter in cooperation with the joint worksite health and safety committee / Safety Committee or health and safety representative, if applicable
- employers cannot take or threaten discriminatory action against a worker for exercising their rights and duties under the legislation
- other workers may be assigned to the work if they are advised of the refusal, reason for it and are made aware of their own right to refuse work after the employer determines there is not a risk

The following is general advice on refusing unsafe work and dealing with situations involving potentially unsafe work:

- If an employee is asked to do something unsafe that is not part of their normal work; or if the employee thinks something at the workplace is unsafe to him/her or other employees, they should tell their principal or non-school based department head.
- The principal or non-school based department head is responsible for looking into the employee's concern and taking appropriate action.
- The principal or non-school based department head may wish to use the assistance of a Division Health and Safety Member or the Health and Safety Committee at their site in resolving the situation.
- This topic is addressed during the employee safety orientation.

Training

Training of employees is one of the most important issues in assuring due diligence.

Part 1 of the Occupational Health and Safety Code defines competent as “in relation to a person, means adequately qualified, suitably trained and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.” *Direct supervision* is defined as “a competent worker is personally and visually supervising the worker who is not competent and is able to communicate readily and clearly with the worker who is not competent.”

The Occupational Health and Safety Regulation Part 1 Sections 14 and 15 explain competency and training in more detail:

Section 14: Duties of Workers

A worker who is not competent to perform work that may endanger the worker or others must not perform the work except under the direct supervision of a worker who is competent to perform the work.

Section 15: Safety Training

1. An employer must ensure that a worker is trained in the safe operation of the equipment the worker is required to operate.
2. An employer must ensure that the training referred to in subsection (1) includes the following:
 - a. The selection of the appropriate equipment.
 - b. The limitations of the equipment.

- c. An operator's pre-use inspection.
 - d. The use of the equipment.
 - e. The operator skill required by the manufacture's specifications for the equipment.
 - f. The basic mechanical and maintenance requirements of the equipment.
 - g. Loading and unloading the equipment if doing so is a job requirement.
 - h. The hazards specific to the operation of the equipment at the worksite.
3. If a worker may be exposed to a harmful substance at a worksite, an employer must:
 - a. Establish procedures that minimize the worker's exposure to the harmful substance.
 - b. Ensure that a worker who may be exposed to the harmful substance
 - is trained in the procedures.
 - applies the training.
 - is informed of the health hazards associated with exposure to the harmful substance.
 4. A worker must participate in the training provided by an employer.
 5. A worker must apply the training referred to in points 1 and 3 above.

Each section of the manual provides an outline of training requirements. In addition to WHMIS and procedure-based training (safe work practices and codes of practice), the following training topics should be considered:

- Safety orientations for new employees (required).
- Employee duties and responsibilities under the Occupational Health and Safety Act, Regulation and Code.
- Safety awareness training. For example, when a near-miss incident reporting system is instituted, it is usually necessary to train employees how and what to report and why reporting is so important.
- Safety motivation.
- Supervisory Staff should be familiar with safe work practices, correction and coaching techniques.
- All members of the Safety Committee, as well as employees with responsibility for investigations, should be oriented in investigation techniques.
- Training will be required for employees who are involved in conducting inspections, audits and assessments.
- Training will be required for emergency response staff.

Over time, the focus of training will change from health and safety training to the development of the skills and capabilities to act in a truly "duly diligent" fashion. Remember that due diligence is not a set of techniques, but rather a way of approaching day-to-day activities.

Employees who are trained should be tested. "Certification" for any task should be based on performance testing. Those who fail tests must be required to repeat the program. All training

records (instructor name, attendance lists, achievement, etc.) should be carefully documented. Current records of employees trained in first aid, WHMIS and TDG should be kept in their employee file.

Health and Safety Evaluations

Well conducted audits are a very important part of monitoring performance to see if the program is operating effectively. Be sure to conduct WHMIS/TDG evaluations regularly, using the forms provided in the Chemical Hazard section.

There is an important difference between an evaluation and an inspection.

- The objective of an inspection is to determine whether the organization is in compliance with legislation and with internal standards.
- The objective of an evaluation, on the other hand, is to determine whether there are systems in place that will assure compliance.

When your evaluation is complete, be sure to go over your findings with relevant employees and initiate any changes required.

An internal review of the Division's overall Occupational Health and Safety Program will be conducted every year.

Continuous Improvement

Due diligence is an attitude of how you operate your school or other facility. To succeed at due diligence, you must achieve a fundamental change in culture.

Forms

Occupational Health and Safety Site Action Plan

School/Site: _____

Date: _____

I. Safety Committee Members - (Minimum 4 staff including: 1 Administrator / Site Supervisor)

	Name	Position
Chair	_____	_____
Co-Chair	_____	_____
Members	_____	_____
	_____	_____
	_____	_____
	_____	_____
	_____	_____
	_____	_____
	_____	_____
	_____	_____

II. Responsibilities and Timelines

Note: Individual accountable is not limited to safety committee members

Responsibility	Individual(s) Accountable	Timeline or Schedule:
Safety Committee ■ Formation ■ Meeting Schedule	<i>Principal / Site Supervisor</i>	<i>September</i>
Monitoring and Evaluation	<i>Safety Committee</i>	<i>On Going</i>
Communication to Staff regarding employee safety (ex. newsletters, meeting minutes, emails, etc.)	<i>Safety Committee</i>	<i>Monthly</i>
Responsibility	Individual(s) Accountable	Timeline or Schedule:
Safe Work Practices	<i>Principal / Site Supervisor</i>	<i>September</i>
Hazard Reporting	<i>All</i>	<i>On Going</i>
Accident/Incident Reporting and Investigation	<i>All and Safety Committee</i>	<i>On Going</i>
Worksite Inspections	<i>All</i>	<i>September / On Going</i>
Emergency Response Plan	<i>Principal / Site Supervisor</i>	<i>September</i>
Training Needs ■ First Aid ■ WHMIS ■ TDG (Transportation of Dangerous Goods) ■ Non-Violent Crisis Intervention	<i>Principal / Site Supervisor</i>	<i>September / On Going</i>
Chemicals ■ Inventory List ■ Storage ■ Safety Data Sheets (SDS) ■ Receiving ■ Disposal		<i>September / On Going</i>

Employee Safety and Security Checklist	<i>Principal / Site Supervisor</i>	<i>September</i>
Confined/Restricted Spaces	<i>Caretaker</i>	<i>September / On Going</i>
First Aid Kits		<i>September / On Going</i>
Personal Protective Equipment		<i>September / On Going</i>

III. Monitoring and Evaluation
