

# Musculoskeletal Injuries Prevention Policy



This Model Policy is a generic template that includes the essential elements of MSI prevention. Although based on BC OHS regulations, it can be easily adapted to the requirements of any and all jurisdictions.

## 1. PURPOSE

ABC Company has adopted this Policy to protect workers from the risks of musculoskeletal injuries in the workplace in accordance with the BC *Workers Compensation Act* (“Act”), the *Occupational Health and Safety Regulation* (“Regulation”), the ABC Company Occupational Health and Safety Program (“OHS Program”), and other applicable requirements and standards.

## 2. DEFINITIONS

For purposes of this Policy:

- **“Administrative controls”** means the provision, use, and scheduling of work activities and resources in the workplace, including planning, organizing, staffing, and coordinating, for the purpose of controlling risk;
- **“Board”** means the BC Workers’ Compensation Board (aka WorkSafeBC);
- **“Engineering controls”** means the physical arrangement, design, or alteration of workstations, equipment, materials, production facilities, or other aspects of the physical work environment, for the purpose of

controlling risk;

- **“Local contact stress”** means a risk factor for MSIs posed by physical contact between the knee, shoulder, elbow, wrist, hand, inside of fingers, or other body tissues in a small, localized area of the body and objects in the work environment such as tools and machinery that can harm blood flow and nerve function;
- **“Musculoskeletal injury” or “MSI”** means an injury or disorder of the muscles, tendons, ligaments, joints, nerves, blood vessels or related soft tissue, including a sprain, strain, and inflammation, that may be caused or aggravated by work;
- **“Practicable”** means that which is reasonably capable of being done;
- **“Qualified”** means being knowledgeable of the work, the hazards involved, and the means to control them by reason of education, training, and/or experience;
- **“Task variability”** means a risk factor for MSI based upon the nature of the work—the longer the time a task remains unchanged, unvaried, or uninterrupted, the less likely the affected tissues are to return to a resting state for recovery;
- **“Work rate”** means a risk factor for MSI that refers to the speed at which tasks are carried out;
- **“Work-recovery cycle”** means a risk factor for MSI that refers to the availability and distribution of breaks in a particular activity to allow the tissue to return to a resting state for recovery.

### 3. POLICY STATEMENT

ABC Company recognizes that work can cause or aggravate MSI and to make good on its commitment to provide workers a safe and healthy workplace, will take appropriate measures to identify, assess, and eliminate or minimize MSI hazards in its workplaces in accordance with the following Policy.

### 4. WORKERS THIS POLICY IS INTENDED TO PROTECT

The intent of this Policy is to ensure that **all workers** engaged to work at ABC Company work sites who are or may be exposed to MSI risks are appropriately protected regardless of who pays or employs those workers, including:

- Full- or part-time workers employed by ABC Company;
- Temporary employees placed by an outside agency to work at the site;
- Contract labourers engaged to perform work at the site;
- Volunteers who work at the site for free; and
- Workers employed by prime contractors, contractors, and subcontractors to perform work at the site under a contract with ABC Company.

## **5. ROLES & RESPONSIBILITIES**

### **5.1. Employer**

ABC Company owners, corporate officers and directors, upper managers, and other representatives who are defined as an “employer” under the Act will oversee this Policy and ensure it is effectively carried out and that:

- All resources necessary to implement this Policy effectively are provided;
- A proper MSI hazard identification and assessment is carried out;
- Appropriate controls are selected and implemented to address identified MSI hazards;
- All workers exposed to MSI hazards receive MSI prevention and awareness training, information, and instruction;
- All affected workers are aware of and follow safe work procedures for performing tasks that involve MSI risks;
- This Policy is appropriately reviewed, in consultation with the workplace Joint Health and Safety Committee (“Safety Committee”) or Health and Safety Representative (“Safety Representative”), or directly with workers at

the site where no Committee or Representative exists.

## **5.2. Safety Coordinator**

The ABC Company Safety Coordinator, facility manager, or other designated individual in charge of safety at the workplace is responsible for day-to-day implementation of this Policy, including ensuring that:

- A proper MSI hazard identification and assessment is carried out;
- The Safety Committee or Safety Representative and affected workers are consulted in the hazard identification and assessment process;
- Appropriate controls are selected and implemented to address identified MSI hazards;
- All workers exposed to MSI hazards receive MSI prevention and awareness training, information, and instruction;
- All affected workers are aware of and follow safe work procedures for performing tasks that involve MSI risks;
- This Policy is appropriately reviewed, in consultation with the Safety Committee or Safety Representative, or directly with workers at the site where no Committee or Representative exists.

## **5.3. Supervisors**

Individuals who instruct, direct, and control workers in the performance of their duties are responsible for ensuring those workers receive the necessary supervision, instruction, and MSI training and education they need to work safely and may also be called upon to perform or participate in the measures set out in this Policy, including:

- MSI hazard identification and assessment;
- Selection and implementation of MSI controls;
- Delivery of MSI training and education to workers;
- Review of safety measures and this Policy.

#### **5.4. Safety Committee/Safety Representative**

The Safety Committee or Safety Representative is responsible for supporting this Policy and consulting with ABC Company with regard to:

- MSI risk identification, assessment, and control;
- The content and provision of worker MSI training and education;
- Evaluation of safety measures taken; and
- Annual review of this Policy.

#### **5.5. Workers**

Workers will support this Policy and help implement it by:

- Ensuring that they are aware of and follow safe work practices for eliminating or controlling MSI risks;
- Participating in MSI training including gaining an understanding of the signs and symptoms of the MSIs their work could cause;
- Following their MSI training when doing their jobs;
- Using all required personal protective equipment ("PPE");
- Notifying their supervisors if they are experiencing signs or symptoms of MSI;
- Reporting MSI hazards or potential hazards to their supervisor in accordance with the Section 04 – Workplace Hazard Notification Policy;
- Taking part, when requested, in a workplace inspection.

### **6. HAZARD ASSESSMENT**

#### **6.1. MSI Risk Factors**

ABC Company will designate qualified personnel to identify factors in the workplace that may expose workers to the risk of MSIs. Once identified, such factors will be assessed to determine the hazards they pose to workers. MSI hazard identification and assessment will take into account risks

created by:

- The physical demands of work activities, including:
  - Force required to do them;
  - Repetition;
  - Duration of the stress imposed;
  - Work postures required to perform the activity; and
  - Local contact stresses;
- The physical layout and condition of the workplace or workstation, including:
  - Working reaches;
  - Working heights;
  - Seating; and
  - Floor surfaces;
- The characteristics of objects handled, including:
  - Size and shape;
  - Load condition and weight distribution; and
  - Container, tool, and equipment handles;
- The environmental conditions, such as:
  - Temperature;
  - Lighting; and
  - Glare;
- How the work is organized, including:
  - Work-recovery cycles;
  - Task variability; and
  - Work rate.

## **6.2. MSI Hazard Identification & Assessment Methods**

MSI risk factor identification and assessment will be carried out by qualified personnel in consultation with the workplace Safety Committee or Safety Representative, workers with signs or symptoms of MSI and a representative sample of workers required to carry out the work being assessed. Methods of assessment may include:

- Direct observation of workers performing work activities

- involving or potentially involving MSI risk;
- Review of records that may offer insight into the hazard posed by the work activity, including but not limited to:
- Logs and summaries of injuries to workers performing the activity;
- Records of complaints of MSI symptoms by workers performing the activity;
- Workers' compensation claims for injuries or disabilities by workers performing the activity;
- Workplace audit results; and
- Recommendations and findings of outside consultants.

## 7. MSI HAZARD CONTROLS

In consultation with the Safety Committee or Safety Representative, ABC Company will implement measures to eliminate, or if total elimination is not practicable, minimize the risk of MSI to workers identified during the above assessment process in accordance with the following hierarchy of controls and principles for controlling hazards:

- Where practicable, ABC Company will use engineering controls such as workstation design, ergonomically designed tools, lifting equipment, to eliminate or minimize MSI risks;
- Where total elimination of MSI risks by engineering controls is not practicable, ABC Company will use administrative controls including safe work procedures and scheduling practices to eliminate or minimize MSI risks;
- ABC Company will require use of PPE such as gloves, anti-fatigue mats, knee pads, and cushioning inside footwear in combination with and **as a complement** to engineering or administrative controls;
  - PPE will be used **as a substitute** for engineering and administrative controls only if circumstances where engineering and administrative controls are

not practicable to use;

- ABC Company will, without delay, implement interim MSI control measures when delays are incurred to the implementation of permanent control measures.

## **8. TRAINING & EDUCATION**

ABC Company will ensure that every worker who is or may be exposed to MSI hazards receives before such exposure occurs:

- Notification about the MSI risks they face on the job;
- Education in risk identification related to the work, including how to recognize the signs and common symptoms of MSIs, the potential health risks posed, and how to respond if they detect such signs and symptoms;
- Training and instruction about the control measures taken to eliminate or minimize those MSI risks and how to use them, including any safe work procedures, mechanical aids, or PPE required.

ABC Company will consult with the Safety Committee or Safety Representative on the content and provision of such worker MSI education and training.

## **9. MONITORING**

ABC Company will, in consultation with the Safety Committee or Safety Representative, monitor the effectiveness of any control measures implemented to eliminate or manage MSI risks at least once a year. Where monitoring indicates that MSI controls are not working effectively, ABC Company will implement corrective measures without undue delay. Such control measures will, in turn, be monitored in accordance with this Policy.

## **10. PRIME CONTRACTORS, CONTRACTORS & SUBCONTRACTORS**

Prime contractors, contractors, and subcontractors hired to perform work involving exposure to MSI hazards at ABC Company work sites will be:



- Notified of the MSI hazards posed to their workers;
- Notified of the safe work procedures, the terms of this Policy, and the other measures in place to protect affected workers from those MSI hazards;
- Required to notify any of their own workers who are affected by MSI hazards about such hazards and the control measures, including but not limited to any ABC Company safe work procedures that apply;
- Required to ensure their workers comply with such safe work procedures and the terms of this Policy.

Prime contractors in charge of work at ABC Company work sites that involves exposure to MSI hazards covered by this Policy will protect the workers performing the work from MSIs by either:

- Directly applying ABC Company's safe work procedures and the terms of this Policy; or
- Applying their own safe work procedures and MSI control measures that meet the requirements of the Regulation and are coordinated with and provide at least the same degree of protection as ABC Company safe work procedures and this Policy against MSI hazards to workers performing the contract work.

## **11. EVALUATION**

This Policy will be reviewed, in consultation with the Safety Committee or Safety Representative, or directly with workers when no Committee or Representative exists, at least once a year and more frequently as circumstances dictate.

### **Legislation/Regulations/Standards**

Workers Compensation Act, RSBC 1996, c 492

Occupational Health and Safety Regulation, BC Reg 296/97