Protecting Workers Who Work Alone — Compliance Game Plan



The 4 steps you must take to protect workers who work alone or in isolation.

Workers are generally safest when they're with co-workers, supervisors and others who can provide help if they get into trouble'or keep them out of trouble in the first place. Working alone increases the likelihood that <u>injuries will occur and that they'll be more serious when they do</u>. As OHS director, you need to protect these vulnerable workers; the migration of <u>workers to the home</u> in wake of the pandemic adds new urgency to this challenge. Here's a game plan to keep workers who work alone or in isolation safe and comply with OHS working alone requirements.

What the Law Requires

There are certain dangerous tasks that OHS laws ban workers from performing when they're alone, such as:

- Entering IDLH confined spaces, that is, those with atmospheres that are immediately dangerous to life and health:
- Installing, repairing, removing or servicing live energized equipment of 600 volts or more;
- Handling certain highly toxic materials; and
- Working in extreme weather conditions.

Most jurisdictions (AB, BC, MB, NB, NL, NT, NU, PEI, QC, SK) have OHS regulations requiring employers to take special measures to protect **any** workers who face hazards because they work alone or in isolation. Such requirements also exist but are merely implied as part of an employer's general duty to ensure health and safety under FED, NS, ON and YK OHS laws. Such workers can be grouped into 5 broad categories:

- Workers who handle cash, such as taxi drivers, gas station attendants, convenience store clerks and other retail and food outlet workers;
- Workers who travel away from their base office to meet clients such as home care nurses, social services workers and bylaw enforcement officers;
- Workers performing hazardous work without having routine interaction with customers or the public, including workers in the forestry, oil and gas industries;
- Workers who travel alone and have no routine interaction with customers or the public, such as truck drivers and business people in transit; and
- Workers at risk of a violent attack because their work site is isolated from public view, such as security guards and custodians.

Do OHS Work Alone Requirements Cover Telecommuters'

The short answer, at least in most jurisdictions, is YES if the telecommuter works in a setting where assistance is 'not readily available' in the event of an emergency or if the worker suffers a work injury or illness.

4-Step Working Alone Compliance Game Plan

No matter what part of Canada you're in, you must take 4 basic steps to ensure the safety of those who work alone or in isolation, which you can implement as part of a <u>written</u>

Step 1: Do a Hazard Assessment

First, identify which of your workers work alone or in isolation in settings where assistance isn't readily available. Then, designate a competent person to do a hazard assessment of the hazards those workers face because they're alone or in isolation. In BC, MB, NL, NT, NU and SK the assessment must be carried out in consultation with the workplace JHSC or health and safety representative ('safety rep') or, if there is no JHSC or safety rep, the workers themselves. The assessment process should include:

- Analysis of Previous Incidents at Site: Gather information on previous incidents where workers were exposed to hazards while working alone or in isolation in the workplace over the past 2 or 3 years;
- •Analysis of Experience at Similar Sites: Gather information on experience in similar workplaces, including severity and frequency of any hazards to which workers working alone or in isolation have been exposed; potential sources of such information include the internet, NIOSH, industry associations or the police;
- Analysis of Other Risk Factors: Consider:
 - How long the person will be working alone;
 - The type or nature of the work; and
 - The physical characteristics, age or other special vulnerabilities of the worker who works alone; and
- Inspection of the Worksite: Inspect the site where the work will be done, which may include the worker's home, and consider risk factors like:
 - Its location, including the neighborhood, proximity of hospitals, EMT and fire-fighting services and how reachable it would be in an emergency;
 - Its physical design features; and

• Existing safety measures in place and how effective they are.

OHSI Resources

Know The Laws for Protecting Workers Working Alone

Safety Policy for Workers Working Alone or in Isolation

Telecommuter Home Office Safety Inspection Checklist

What You Must Do to Protect Workers who Work from Home

Step 2: Implement Controls to Protect Workers Working Alone

Once you determine that working alone or in isolation poses hazards you must implement <u>reasonably practicable measures</u> to control them following the principles of the hierarchy of controls.

First Choice: Elimination

If reasonably practicable, completely eliminate the hazard, such as by not carrying out operations that must be performed by workers alone or in isolation or by continuing to perform those tasks but requiring that they be done by at least 2 people.

Engineering Controls

If elimination isn't reasonably practicable, take measures to minimize the hazards you identify. In the context of working alone, the prime objective is to use a combination of engineering and work/administrative controls to create an 'effective system of communication.' **Objective:** Ensure the communication system permits a worker who needs help to send a message or signal to someone capable of providing such help.

The engineering elements include <u>equipment and technology</u> necessary to establish one of the following:

- Radio communication;
- Landline or cellular phone communication; or
- Some other effective means of electronic communication that includes regular contact with the worker.

<u>GPS</u> and <u>other electronic tracking technology</u> may also be necessary for remote locations or worksites where workers who disappear might be hard to find.

Electronic Systems to Consider for Monitoring Workers Working Alone

According to WorkSafeBC guidelines, acceptable technology solutions for populated areas may include call-in systems and externally or internally monitored panic alarm systems. For remote locations or worksites where workers who disappear might be hard to find, employers should consider GPS and other electronic tracking technologies, as well as satellite phones and radio transmitters.

Work/Administrative Controls

If the above electronic communication systems aren't reasonably practicable, you must rely on work/administrative controls to ensure effective communication. Work/administrative controls must also be used in combination with and as a backup to any electronic system you use in case of equipment failure. Key work/administrative controls for protecting workers who work alone include:

• Designating a person to <u>visit or contact the worker</u> at regular intervals'that person should be a worker who's accountable rather than a family member or other nonworker, which WorkSafeBC guidance says is allowed only in 'low and negligible risk scenarios';

- Creating a <u>safe work procedure for working alone</u> and maintaining contact specifically defines the <u>contact</u> <u>procedures</u> that and <u>frequency</u> based on the hazards'the greater the hazard, the shorter the intervals should be;
- Checking in with the worker at the end of the shift;
- Ensuring the contact person keeps <u>written records of contacts</u>; and
- Establishing procedures for first aid and emergency response and rescue.

PPE and Protective Clothing

Make sure workers have and use appropriate protective clothing and personal protective equipment to protect them from whatever hazards they face while working alone or in isolation.

OHSI Resources

Know The Laws for Protecting Workers Working Alone

<u>Safety Policy for Workers Working Alone or in Isolation</u>

Using Technology to Track the Safety of Workers Working Alone

<u>Working Alone and Video Surveillance</u>

<u>Checklist of Safety Measures for Workers Working Alone</u>

Safe Work Procedure for Working Alone

Safe Work Procedure for Contacting Worker Who Works Alone

<u>Worksheet for Determining Frequency of Contacting Workers Who</u> Work Alone

Template Contact Record for Workers Working Alone

Step 3: Provide Appropriate Safety Training for Working Alone

Nobody should be allowed to work alone or in isolation or serve as a designated contact unless and until they receive training and demonstrate that they understand and are competent to apply the information in actual work situations. Such training should be documented and include, at a minimum:

- The hazards posed by doing the particular job alone or in isolation;
- The special procedures for establishing and maintaining contact;
- The required communication equipment and how to use it;
- The procedures for keeping contact records; and
- The procedures for summoning first aid or emergency help.

OHSI Resources

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Safety Policy for Workers Working Alone or in Isolation

Template Training Record for Workers Working Alone

Step 4: Monitor Your Controls

You must continually monitor your <u>controls</u> to identify problems and make necessary corrections. Review should be undertaken on a regular basis and in response to incidents and changes in work operations or conditions that may alter or weren't addressed in the current assessment. You'll also have to consult with the JHSC or safety rep the way you did in carrying out the original hazard assessment.

OHSI Resources

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