

COVID-19 Exposure Control Planning Guide

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Putting Together an Exposure Control Plan

The employer must create their Exposure Control Plan in consultation with the Joint Occupational Health and Safety (OHS) Committee, Safety Representatives, or with workers. It must detail how employers and staff will manage operations during the pandemic.

The plan outlines:

1. How employers, supervisors, and workers will eliminate or control the risk of exposure at work. (See [Risk Assessment Process](#) and [Control Measures](#)).
2. Areas where the controls are not fully effective.
3. The training workers will receive and how it will be provided.
4. The procedures to follow if a worker is, or believes they may have been, exposed.
5. The investigation requirements for any occurrence of transmission of the virus.
6. How to measure and track the effectiveness of the controls for protecting workers, while keeping up-to-date as new information and directives about COVID-19 become available through the Chief Public Health Office(s).

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Considerations for an Exposure Control Plan

The threat of COVID-19 raises many health and safety concerns in the workplace. To better prepare, ask yourself the following:

Risk assessment and controlling the risk of exposure:

1. What are you doing to prevent workers from being exposed to COVID-19?
 - Have you done a walk-through of the workplace to identify specific areas or tasks that may increase the risk of exposure?
 - Have you asked your Joint OHS Committee, Safety Representatives, or workers, where potential exposures may occur and how they think exposures can be controlled?
 - Are tasks that require Personal Protective Equipment (PPE) really necessary at this time, or can they wait until the risk is lower?
2. What controls have you developed that will eliminate or minimize the risk of exposure?
 - How have you put them in place?
 - Have you trained workers?
 - How are the controls working (are they effective)?

Communication with supervisors, workers, clients, and the general public:

3. How are you telling workers about COVID-19 (for example: Do they know how it spreads)?
4. How are you training workers on what to expect and on their roles and responsibilities?
5. Have you trained supervisors and workers on the steps for reporting a potential exposure to COVID-19?
6. What is your investigation procedure for exposure to COVID-19 in the workplace? Have you shared this procedure with your supervisors, Joint OHS Committee, or Safety Representatives?
7. How are you telling clients and customers what steps to follow when they are at your workplace?

Controlling the number of people on site:

8. How are you controlling the number of workers, clients, customers, and general public in your workplace?
 - What is your core business, and can it be done safely with fewer workers at the worksite?
 - Do all workers need to come to work? Can some work from home?
 - How can you prioritize the work that needs to be done at the workplace so your business operate as safely and as effectively as possible. ?
 - Can you stagger shifts to reduce the number of workers present at one time?
 - How are you limiting the number of customers or clients in the building lobby, elevators, reception, and shipping, and receiving?
 - How are you ensuring cleaning of high touch items and surfaces during and between shifts?
9. How will you ensure everyone in the workplace follows the steps you've put in place to reduce their risk of COVID-19 exposure?

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Roles and Responsibilities

Employers

It is mandatory to manage the following with your Exposure Control Plan:

- Provide the most current information to workers about:
 - How the virus can enter the body and the hazards associated with it;
 - The signs and symptoms of the virus; and
 - Activities, tasks, and jobs that put a worker at risk for exposure to the virus.
- Outline the required training for workers about:
 - How to reduce the risk of exposure; and
 - The preventative measures the employer and worker will take to reduce the risk of exposure.
- Inform workers who could be exposed to COVID-19 at the worksite:
 - Any dangers associated with a vaccine, if there is one available;
 - What precautions they must take to reduce their risk of exposure;
 - What they must do if they believe they have been exposed to the virus, such as self-isolate and self-monitor, and who to call;
 - What procedures will take place at the worksite if there is suspected exposure;
 - If a worker requires a test, they may arrange for testing during the worker's normal working hours at a health care facility; and
 - If these appointments must occur outside of normal business hours, employers must:
 - Credit the worker's attendance for the test as time at work; and
 - Ensure that the worker does not lose any pay or benefits when receiving the test.
- Ensure that exposure to COVID-19 incidents are reported and investigated. At a minimum, an investigation will:
 - Protect the confidentiality of the exposed worker;
 - Examine the route of exposure;
 - Determine the circumstances in which the exposure occurred; and
 - Recommend measures to prevent further infection and exposure at the worksite.
- Review and update your Exposure Control Plan in consultation with the Joint OHS Committee, Safety Representatives, and the workers:
 - Review as necessary to reflect the pandemic situation as it evolves; and
 - Review as advances in infection control methods develop, including advances in equipment and processes in the workplace, or at least once every two years.

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The Exposure Control Plan will include how supervisors, the Joint OHS Committee, Safety Representatives, and workers will implement the procedures for:

- *Controlling the risk of exposure.*
- *Reporting and investigating suspected exposure at the workplace.*

Supervisors:

- Perform a [Worker Hazard Assessment](#) and a [Workplace Risk Assessments](#) with workers at the worksite(s);
- Implement controls identified through the hazard and risk assessments to protect workers from exposure to the virus;
- Review incident reporting and the investigation process with workers, with a focus on the procedures they must take if:
 - A worker is exposed to the virus; or
 - A worker believes they may have been exposed.
- Establish mandatory procedures and schedules for cleaning at the worksite, including:
 - Disinfecting Personal Protective Equipment (PPE) and other equipment that may be contaminated with the virus;
 - How to properly dispose of clothing, PPE, or other equipment that may be contaminated with the virus; and
 - Assigning responsibility for carrying out infection control procedures and tasks.
- Verify that workers have received training and can demonstrate competence in the control measures.

Workers:

- Participate in training on safe work procedures and practices, and how to correctly wear and dispose of prescribed PPE;
- Follow all safe work procedures and practices;
- Demonstrate that they understand the signs and symptoms of the virus;
- Report all exposure incidents to the worksite supervisor;
- Use prescribed PPE correctly;
- Be familiar with the Exposure Control Plan; and
- Perform a [Worker Hazard Assessment](#) before starting work and if your job or tasks change.

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Hazard and Risk Assessment Process

The COVID-19 virus spreads from **person to person** and from **contaminated surfaces to person**.

- The higher the chance for exposure, the higher the risk to the workers.
- To determine risk, look at how likely workers may:
 - Come into contact (closer than 2-meters) with people who may have the virus.
 - Touch surfaces and items that infected people may have touched.

Review your all the activities and operations your business conducts with the Joint OHS Committee, Safety Representatives, and workers.

Consider the following to see how workers could be exposed during work:

- The layout of your workspaces, including publicly accessible areas such as elevators, lobbies, aisles, and common entry ways.
- The facilities available at the worksite, including washrooms, high touch areas, and hand-sanitizing stations.
- The type of business you have and the services provide.
- How workers perform their work tasks.
- The people workers may come into contact with through their work, including other workers, suppliers, customers, clients, or the general public.
- Workers who may be more vulnerable to the effects of COVID-19.

Hazard and Risk Assessment Forms

Hazard and risk assessment forms are available on the [WSCC's COVID-19 Resources webpage](#).

COVID-19 Workplace Risk Assessment: Employer or worksite supervisor must complete this in consultation with Join OHS Committee, Safety Representatives, and workers at the worksite. They must also ensure workers understand the hazards and control measures.

COVID-19 Worker Hazard Assessment: Workers must complete this before work begins and demonstrate they know how to work safely at the site. This needs to be updated regularly or when a worker has a new task list or job.


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Control Measures

There are five basic ways to control hazards. They are organized in a **hierarchy of controls** from the most effective to least effective. Consider possible control measures in order of effectiveness:

1. **Eliminate** (physically remove) the source of exposure.
2. Look at **substitution** by replacing the hazardous object or condition with something that is less dangerous.
3. **Engineering** controls create physical barriers, phone apps, hand washing stations, which will help to reduce the risk.
4. **Administration** (policies and procedures) looks at how the work is done, and provides educational tools and official reference to train employees on how to safely work.
5. As a last resort, consider adding **Personal Protective Equipment (PPE)**.

In many cases, a combination of hazard controls is necessary to control the risk of COVID-19.

HIERARCHY OF CONTROLS FOR COVID-19		
Level of Protection	Control	Examples
	Elimination	Social isolation: <ul style="list-style-type: none"> Working from home.
	Substitution	Use a different process for interacting with public: <ul style="list-style-type: none"> Drop-off and pick-up no direct contact delivery points.
	Engineering	Ventilation, physical barriers: <ul style="list-style-type: none"> Plexiglass or other barriers between worker and customer. Re-arrange the workspace to create room for physical distancing. No-touch equipment.
	Administration	Training, policies and procedures: <ul style="list-style-type: none"> Improve shift schedules and remote work rotation. Hand washing procedures. Disinfection schedules and procedures. Limit the numbers of people at the location.
	PPE	Protection on the worker's body: <ul style="list-style-type: none"> surgical masks and fitted respirators gloves tyvek suits

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Monitor the Controls

After developing and implementing your Exposure Control Plan, employers must make sure that the controls are effective:

- Check with workers after offsite work, at shift-end, and if an incident occurs to make sure the methods and procedures are working.
- When the pandemic is declared over, gather a team of workers and supervisors to evaluate what worked well and what could be done better if a future outbreak occurs.
- The employer should review your Exposure Control Plan with the Joint OHS Committee, Safety Representatives, or a team of workers and supervisors at least once every two years. You should meet more frequently if the business or work sites change to make sure that the organization is prepared for another outbreak situation.

Short-Term Monitoring

During a pandemic situation, workers, supervisors, and the employer need to have open communication to discuss issues and concerns about hazards and the protective measures. Use regular safety meetings (such as pre-shift, post-shift, post-job, weekly) as an opportunity to make sure that the protective measures put in place are working, and that there are no gaps.

Discussion items include:

- Do all workers understand the administrative processes and procedures?
- Are administrative procedures being followed? If not, why not?
- Are the current methods for separating workers from potential exposure working? If not, how can they be better?
- Is PPE functional, and does everyone understand how to use it correctly? If not, what is needed or what changes should be made?
- Has the training met the needs for the workers? Is there other training they need?
- Do workers have any concerns? Have they identified new sources of exposure to the virus? As them what processes and procedures are working or not working for them?

Make a note of both the gaps or difficulties that workers identify and what is working well. Use this opportunity to discuss possible improvements:

- Reinforce that workers must report incidents that present a risk of exposure to the virus.
- Explain how incidents are investigated.
- Discuss any new processes or procedures developed to protect workers.

Long-Term Monitoring

The plan is to be reviewed at least once every two years. When the pandemic is declared over by health officials, the employer should debrief with the Joint OHS Committee, Safety Representatives, or a team of workers and supervisors to discuss:

- What worked well, and what did not?
- Where were the gaps in managing for safety during the pandemic?
- What equipment and processes must be ready for use during a pandemic?
- Are controls appropriate for the jobs and tasks performed at the worksite?
- Is required PPE available?; and
- Is training relevant and available?

Use this information to revise your Exposure Control Plan so it is ready to use in the event of a future pandemic.

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WSCC COVID-19 Resources for the Worksite

The following COVID-19 Resources are available at <https://www.wscn.nt.ca/health-safety/covid-19/forms>:

- COVID-19 Exposure Control Plan Checklist
- COVID-19 Workplace Risk Assessment
- COVID-19 Worker Hazard Assessment
- COVID-19 Exposure Control Measures
- COVID-19 General Safety Precautions

For information about respirators, medical masks, non medical masks and face coverings, see Health Canada: [Personal Protective Equipment and Medical Supplies](#)

Additional Resources

- Johns Hopkins Education and Research Center for Occupational Safety and Health: <https://www.jhsph.edu/research/centers-and-institutes/johns-hopkins-education-and-research-center-for-occupational-safety-and-health/can-a-mask-protect-me-putting-homemade-masks-in-the-hierarchy-of-controls>
- Government of Nunavut Department of Health: <https://gov.nu.ca/health/information/covid-19-novel-coronavirus>
- Government of the Northwest Territories Department of Health and Social Services: <https://www.hss.gov.nt.ca/sites/hss/files/resources/self-isolation-information-sheet.pdf>
<https://www.hss.gov.nt.ca/en/services/coronavirus-disease-covid-19>
- U.S. Department of Labor Occupational Safety and Health Administration's Guidance on Preparing Workplaces for COVID-19: <https://www.osha.gov/Publications/OSHA3990.pdf>
- Codes of Practice: Personal Protective Equipment Respiratory Protection. Worker's Safety and Compensation Commission (WSCC) of the NWT and Nunavut: <https://www.wscn.nt.ca/sites/default/files/documents/PPE%20-%20Respiratory%20Protection%20Code%20of%20Practice%20May%2031,%202016%20EN%20-%20NT.pdf>
- World Health Organization: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-for-public>