

Operations
Division Occupational
Health and Safety

Field Visit Report

Page 1 of 6

OHS Case ID: **04251PHRM515**Field Visit no: **04251PHSS520**Visit Date: **2020-APR-24**Field Visit Type: **INITIAL**Workplace Identification: **WILLIAM OSLER HEALTH CENTRE: BRAMPTON MEMORIAL HOSPITAL** Notice ID:**CAMPUS****20 LYNCH STREET, BRAMPTON, ON, CANADA L6W 2Z8**Telephone:
(905) 451-1710JHSC Status:
ActiveWork Force #:
2000

Completed %:

Persons Contacted: **SEE DETAILED NARRATIVE**Visit Purpose: **AUDIT COMPLIANCE WITH THE OCCUPATIONAL HEALTH AND SAFETY ACT AND ITS REGULATIONS**Visit Location: **20 LYNCH ST. BRAMPTON, VIA PHONE**Visit Summary: **TWO ORDERS ISSUED, SEE DETAILED NARRATIVE****Detailed Narrative:**


The field visit took place over the phone and the following people participated in the telephone call:
Steve Sloan- Occ. Manager, Occupational Health & Safety William Osler Health System
Candace Barone - Cert. JHSC Worker Rep. / Occupational Therapist
Joan McCullum - JHSC Worker Rep. for Brampton Civic Hospital / ONA Rep.
Christina St. Pierre - MLTSD Hygienist

The reason for this visit is to respond to a complaint made to the Ministry of Labour, Training, and Skills Development. The complaint includes the following:

1. The complainant alleges the employer established practices in respect to re-processing of PPE, extended use and cleaning of PPE without consultation of the JHSC and failed to inform, instruct and train workers of the dangers of these new practices
2. Concern of work place exposure as complainant alleges employer failed to provide in writing the necessary information as directed under the OHS section 52 (2) and Ont. Reg. 67/83 S5.(5)
3. The complainant alleges the employer did not provide the JHSC with information on:
 - a) the Risk Assessments for COVID-19,
 - b) number of PPE in the employer's position on a daily basis,
 - c) notification to the committee of all work place exposures,
 - d) root cause analysis of each workplace exposure,
 - e) and corrective measures to eliminate or minimize future exposures
4. The complainant alleges the employer is not adhering to the Point of care risk assessment as locking of PPE in retaliation by employer when PCRA determines a higher level of PPE

Inspector Findings:

1. Workplace parties stated that as part of the Personal Protective Equipment (PPE) contingency plan they implemented a "re-processing and cleaning of PPE procedure".

Recipient	Inspector Data	Worker Representative
Name	CRYSTAL STEPHENS OCCUPATIONAL HEALTH & SAFETY INSPECTOR PROVINCIAL OFFENCES OFFICER	Name <u>Candace Barone</u>
Title	400-1290 Central Pky W Mississauga ON L5C 4R3 MOLComplianceFormsMississauga@ontario.ca Tel: (647) 203-3854 Fax: 905-615-8853	Title <u>Co-Chair JHSC-PMC</u>
Signature	Signature 	Signature <u>C. Barone</u>

You are required under the Occupational Health and Safety Act to post a copy of this report in a conspicuous place at the workplace and provide a copy to the health and safety representative or the joint health and safety committee if any. Failure to comply with an order, decision or requirement of an inspector is an offence under Section 66 of the Occupational Health and Safety Act. You have the right to appeal any order or decision within 30 days of the date of the order issued and to request suspension of the order or decision by filing your appeal and request in writing on the appropriate forms with the Ontario Labour Relations Board, 505 University Ave., 2nd Floor, Toronto, Ontario M5G 2P1. You may also contact the Board by phone at (416) 326-7500 or 1-877-339-3335 (toll free), mail or by website at <http://www.olrb.gov.on.ca/english/homepage.htm> for more information.

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Page 2 of 6

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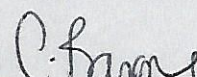
20 LYNCH STREET, BRAMPTON, ON, CANADA L6W 2Z8

- Workplace parties stated that goggles and face shields are currently being cleaned and disinfected so that they can be reused. The process involves cleaning with Sani wipes which was reported to leave a residue on the materials. Wiping down with isopropyl alcohol is then performed to remove the residue. The employer stated that the cleaning procedure is posted on the intranet. Workplace parties indicated that they will continue to investigate suitable methods for cleaning goggles and face shields to obtain the best results.
- Workplace parties also reported that procedure masks and N95 Respirators are being collected in a systematic way in the event a standard for cleaning of masks is established to ensure masks can be safely reused. They are currently waiting for approval to potentially use the vaporized hydrogen peroxide STERIS sterilization system for decontaminating N95 respirators. Prior to reuse of masks going into service, the Joint Health & Safety Committee (JHSC) will be provided with the new standard for re-processing and how standards were met.
- Workplace parties state work instructions for the re-processing of goggle and face shields were communicated via email to workers as well as being posted on the Intranet and in memos. In addition, Safety Officers are in each department to help coach workers on the procedure for cleaning face shields, collecting used masks as well as other PPE assistance.
- The employer acknowledges that action was taken quickly and that the JHSC was not initially notified of the contingency plan re-processing procedure. Communication to the JHSC was emailed on April 22nd, 2020. For the remainder of the COVID-19 pandemic the employer has implemented a dedicated coordinator who to ensure the JHSC is notified.

2. Workplace parties agreed that the concern regarding the employer not communicating the Notice of Occupational Illness report to the JHSC was dealt with previously. The employer provided the JHSC and the Union with a copy of the Notice of Occupational Illness report on April 22nd, 2020.

3. Risk Assessment:

- a) A risk Assessment is required for the facility with regards to COVID-19 as per Directive #5 from the CMOH. The workplace parties stated the risk assessments for COVID-19 has not been completed to date for any of the five William Osler Health System Sites. The employer stated they did not have written pandemic measures & procedures for the health and safety of workers established under O. Reg. 67/93, s. 8. in writing. ORDER ISSUED.
- The employer stated they would be starting a risk assessment for Covid-19 on Monday April 27th, 2020. Work locations have been scheduled, starting with Etobicoke General Hospital.
- The JHSC worker members requested a copy of the assessment to have knowledge of what it will include. The employer stated they will provide a copy of the assessment form to the JHSC prior to starting the assessment
- The employer is reminded that once there has been a risk assessment or update conducted at the workplace

<p>Recipient</p> <p>Name _____</p> <p>Title _____</p> <p>Signature _____</p>	<p>Inspector Data</p> <p>CRYSTAL STEPHENS</p> <p>OCCUPATIONAL HEALTH & SAFETY INSPECTOR</p> <p>PROVINCIAL OFFENCES OFFICER</p> <p>400-1290 Central Pky W Mississauga ON L5C 4R3</p> <p>MOLComplianceFormsMississauga@ontario.ca</p> <p>Tel: (647) 203-3854</p> <p>Fax: 905-615-8853</p> <p>Signature </p>	<p>Worker Representative</p> <p>Name <u>Cardace Barone</u></p> <p>Title <u>Co-Chair JHSC-PMC</u></p> <p>Signature </p>
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Page 3 of 6

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required as a result of the risk assessment, then the employer is reminded of sections 8&9 of the Healthcare regulations.

The following people will be involved in the risk assessment from each site; JHSC, department managers, IPAC as needed, Safety department consisting of site safety specialists and an external consultant Kathryn Reichheld a CRSP with pharmaceutical & industrial experience.

There is a Covid19 Incident Management Team (IMT) that meets daily, The IPC Manager, Janine Domingoes provides regular updates to IMT. A member of the IPC team provides updates to the JHSC at their monthly meetings. The JHSC is consulted on IPC practices.

b) a Personal Protective Equipment (PPE) infographic is posted daily at all entrances and on the Intranet. The infographic highlights inventory items through a coloured dot system. The employer stated that the dedicated JHSC coordinator will send the JHSC the PPE infographic daily starting April 23rd, 2020.


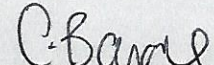
c) risk of exposure is covered by Public Health tracing procedures. In place to reduce the risk of exposure in the workplace is:

- i) universal masking
- ii) adorn the appropriate PPE based on the task and level of care when working with a patient with a suspected case of COVID-19
- iii) contact tracing and isolation procedures are followed to prevent future exposure and spread in the workplace
- iv) hand hygiene practices are adhered too
- v) enhanced cleaning of high touch surfaces using hospital grade disinfectants.

d) the nature of the occupational illness and the circumstances which gave rise to such illness as per the OHSA Sec. 5(5)(b) was provided to the JHSC in the Notice report from the employer

e) the steps taken to prevent further illness as required per Sec. 5(5)(g) of O. Reg. 67/93 was provided to the JHSC in the Notice report from the employer.

4. The workplace parties stated that the Point of Care Risk Assessment (PCRA) is currently in draft form and is to be reviewed with the JHSC on April 27th, 2020. The PCRA will address PPE use.

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Name	CRYSTAL STEPHENS OCCUPATIONAL HEALTH & SAFETY INSPECTOR PROVINCIAL OFFENCES OFFICER	Name <u>Carla Barone</u>
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Notice ID:

As a result of this pandemic PPE is secured to prevent loss. PPE is stored in the workplace at the central "stores" at each site. It is available on each unit and on code blue carts. PPE is controlled by department managers and charge nurses. Managers and charge nurses are ensuring adequate supplies for their departments to ensure levels are maintained. Workers requesting new PPE are directed to their department managers and charge nurses.

Joint Health and Safety Committee/Health and Safety Rep Involvement:

- There is a JHSC, of which at least half of the members represent workers who do not perform managerial functions. The JHSC meet and minutes are taken. Minutes and the names of the Committee members are posted.

Workplace inspections: The workplace inspections are not being formally done on a frequency of at least once a month by a worker member of the JHSC, therefore not meeting the minimum requirement of OHSA/90. ORDER ISSUED.

The employer shall ensure the monthly inspection is completed by May 8th, 2020 and is reminded that the minimum requirement is for workplace inspections to take place once a month and that they be done by a worker without management responsibilities.

- As per section 9.4 the employer shall ensure training on measures and procedures for the control of infections are developed in consultation with the JHSC and reviewed with the JHSC.

- The workplace parties stated that a management team safety representative will make all attempts to participate in the JHSC meetings.

Investigation is on-going.

Resources that may assist workers and employers:

Ministry of Health Emergency Planning and Preparedness

<http://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/Default.aspx>

Public Health Ontario

<https://www.publichealthontario.ca/en/diseases-and-conditions/infectious-diseases/respiratory-diseases/novel>

Recipient

Inspector Data

Worker Representative

CRYSTAL STEPHENS

Name

OCCUPATIONAL HEALTH & SAFETY INSPECTOR
PROVINCIAL OFFENCES OFFICER

Name

Candace Barone

Title

400-1290 Central Pky W Mississauga ON L5C 4R3
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Title

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-coronavirus

Public Health Agency of Canada

<https://www.canada.ca/en/public-health/services/diseases/2019-novel-coronavirus-infection/frequently-asked-questions.html>

Health and Safety System Partners

<http://www.healthandsafetyontario.ca/>

Additional Guidance

www.ontario.ca/coronavirus

You may also contact Telehealth Ontario at 1-866-797-0000

A copy of this report is to be posted in the workplace.

MOL Toll Free Number 1-877-202-0008 Reporting critical injuries, complaints, unsafe work practices,
www.labour.gov.on.ca

Recipient

Inspector Data

Worker Representative

CRYSTAL STEPHENS

Name _____

OCCUPATIONAL HEALTH & SAFETY INSPECTOR
PROVINCIAL OFFENCES OFFICER

Name _____

Carla Barone

Title _____

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Title _____

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Order(s) /Requirement(s) Issued To:

To:

WILLIAM OSLER HEALTH SYSTEM

Org/Ind Role

Primary Employer

Mailing Address:

20 LYNCH ST, BRAMPTON, ON, CA L6W 2Z6

Order(s) /Requirement(s) Description:

You are required to comply with the order(s) /requirement(s) by the dates listed below.

No	Type Code	ActReg	Year	Sec.	Sub Sec.	Clause	Text of Order/Requirement	Comply by Date
1	Time 04251PHTS525	OHTA 67	1990 1993	9	1		At the time of this investigation pandemic measures & procedures for the health and safety of workers established under section 8 were not in writing. The employer shall provide written measures & procedures for the hazards of biological Covid-19 pandemic agents present in the workplace.	2020-MAY-08
2	Time 04251PHTS526	OHTA	1990	9	26		Monthly workplace inspections by the committee member who represents the workers are not taking place. This employer shall ensure that the committee member designated to inspect the workplace inspects the physical condition of the workplace at least once a month.	2020-MAY-08

Recipient

Inspector Data

Worker Representative

CRYSTAL STEPHENS

Name

OCCUPATIONAL HEALTH & SAFETY INSPECTOR
PROVINCIAL OFFENCES OFFICER

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