

Section 4 - Health and Safety

4.1 Joint Health and Safety Committee Policy

Intent

This policy is intended to communicate an outline of the Joint Health and Safety Committees' duties, expectations and operating procedures.

Scope

This policy applies to all employees always and without exception.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to the Joint Health and Safety Committee. Where a Collective Agreement is silent on the issue, this policy will dictate requirements for unionized employees. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

This policy has been developed to incorporate the legislative health and safety requirements of Alberta, British Columbia and Ontario and shall be updated accordingly should the employer expand its operations into additional provinces.

Guidelines

In order to ensure the health and safety of its facilities, employees and guests, the employer requires each of its locations to organize and maintain a Joint Health and Safety Committee.

To carry out its functions, the Committee is required to hold regular meetings and carry out regular inspections of the workplace to identify hazards. All meetings are to be properly documented with appropriate minutes.

In determining an adequate size for the Committee, the following shall be taken into consideration:

- The physical size of the location
- The degree and number of potential hazards present in the workplace
- The number of employees at the location
- The number of departments
- The number of unions
- The number of shifts in a workday

Per provincial legislation, and to ensure adequate representation, the employer requires health and safety committees to be comprised of no fewer than four members employed at the location who are experienced in the various types of work carried out at that location.

The Committee will be comprised of both management and employee representatives. Where a union is present, the employer will ensure that the union is properly represented on the Committee as well. Two co-chairs will be chosen from within the Committee, one employee and one employer representative who will assume a leadership role for the Committee and will be responsible for:

- Controlling the monthly health and safety meetings
- Preparing necessary records and documentation
- Circulating and posting meeting reports and notices

The Joint Health and Safety Committee will fulfill the following functions:

- Identify and evaluate potential hazards and respond to health and safety concerns brought to it by employees;
- Identify solutions and recommend corrective action;
- Follow-up on implemented recommendations;
- Promote safe work practices as well as health and safety awareness;
- Ensure all employees are trained on safe work practices;
- Promote compliance with health and safety regulations and legislation.
- Make sure all accidents and injuries are reported, reviewed, investigated and documented.
- Make recommendations to the employer on ways to improve workplace health and safety; the employer must respond in writing to any concerns or recommendations within 21 days.
- Be present at the investigation of work refusal.
- If a worker is killed or critically injured on the job, the Committee has the obligation to inspect the scene of the accident and any machine, equipment, substance, etc. that may relate to the accident.
- Be entitled to request from management, information such as records, statistics and reports deemed meaningful to the effective operation of a workplace health and safety program.
- Assist in the development of workplace health and safety policies and procedures.
- Record and report to all staff via memo boards or other creative resources the number of days that the property is injury free.
- Request the annual summary of information from the Workplace Safety & Insurance Board about compensation claims related to the workplace of the employer. This information includes:
 - Number of fatalities
 - Number of lost-time injuries
 - Number of work days lost
 - Number of injuries requiring medical aid but did not involve lost work days
 - Incidence of occupational illnesses
 - Number of occupational injuries.
- The Committee shall meet at least once a month during regular working hours and on urgent matters, as required.
- Members of the Committee are entitled to time off from work for authorized activities related to the responsibility of the Committee.
- Committee members will not be held personally liable for anything done or omitted in good faith.

The employer will ensure that safety information is posted in highly visible areas throughout each of its properties. Safety postings will include:

- *The Occupational Health & Safety Act, or Code, depending upon province of employment;*
- The employer's Health and Safety policy;
- The names of Committee members, their department and contact information;
- Minutes of Committee meetings;
- Names, work locations and contact information for first-aid attendants and,
- Other related information, as directed by a safety officer.

4.2 Workplace Occupational Health and Safety Policy

Intent

This policy is intended to provide workplace roles and responsibilities for all employees in order to ensure the health and safety of all employees and the maintenance of all facilities.

Scope

This policy applies to all employees always and without exception.

Unionized employees shall adhere to their current Collective Agreement for policies governing workplace occupational health and safety. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

This policy has been developed to incorporate the legislative health and safety requirements of Alberta, British Columbia and Ontario and shall be updated accordingly should the employer expand its operations into additional provinces.

General Guidelines

The employer is invested in the health and safety of its employees and guests and is committed to providing a safe and healthy working environment. Active participation by everyone, every day, in every job and task is necessary for the safety excellence.

Management will set an example and provide leadership, while employees are responsible for working towards continually improving the overall health and safety conditions at each property. Our goal is a healthy, injury-free work place and by combining our efforts we can achieve this.

The employer:

- Is responsible for supplying an effective strategy capable of managing any occupational health and safety concerns.
- Will ensure that resources are allocated and governed properly to achieve the health and safety requirements and ensure that their policies comply with the organization's legal obligations.
- Will foster a workplace culture of safety.
- Will review the policies on an annual basis, and revise where necessary.
- Will liaise with government agencies to ensure workplace health and safety compliance.
- Will design and develop accident/incident reports and investigation procedures.
- Will review injury and illness reports identifying any trends and develop preventative solutions.
- Will maintain records, reports and statistics meaningful to the health and safety program and will make sure this information is readily available to the Joint Health and Safety Committee, employees and provincial government agencies.

On-site management:

- Will aid in developing, implementing, and enforcing policies and procedures.

- Will continually promote health and safety awareness with instruction, information, training and supervision to ensure the safe performance of employees.
- Will utilize the process of hazard identification, risk management and incident investigation.
- Will perform occupational health and safety inspections of the workplace to identify and control all hazards to employees.
- Are held accountable for the health and safety of workers under their supervision.
- Will ensure that machinery and equipment are safe and that employees work in compliance with established safe work practices and procedures.
- Will maintain an up-to-date working knowledge of health and safety regulations as mandated locally, provincially and federally.

Employees:

- Are responsible for compliance with occupational health and safety policies and procedures.
- Will protect his or her own health and safety by working in compliance with the law and with safe work practices and procedures established by the company.
- Will use appropriate personal protective equipment as required.
- Will report unsafe or potentially hazardous conditions to their manager or the Joint Health and Safety Committee.
- Will complete required occupational health and safety training.
- Will learn the posted Emergency Plan detailing their facilities procedures pertaining to: fire, weather, or medical emergency.
- Are encouraged to inform management or the Joint Health and Safety Committee of any matter they perceive to be an actual or potential workplace hazard.

Health & Safety Rules

These general safety rules are designed to provide all employees with a safe working environment. No rule can possibly cover every hazardous condition, so if you are in doubt, consult management or a member of the Joint Health and Safety Committee.

The employer will develop, implement and communicate rules specific to its various departments and locations and will ensure to incorporate associated procedures and equipment operating procedures. Employees will be made aware of these rules as part of the training for each specific work area, task or equipment operating procedure.

If you have not been properly trained for a task on how to use a piece of machinery or equipment, STOP and ask for help.

The following health and safety rules will be followed:

- Personal Protective Equipment (PPE) shall be worn on all jobs requiring the use of a PPE.
- Employees are strictly prohibited from wearing personal music devices while on duty. Such devices are considered to be a distraction and a hindrance to proper communication as well as the ability to hear in an emergency. Employees found wearing a personal music device while on shift will be subject to immediate disciplinary action.

- C.S.A. approved safety glasses with side shields are mandatory for maintenance work requiring the use of safety glasses.
- Proper footwear must be worn by all employees at all times.
- Materials shall not be piled or stacked higher than two times their base dimension.
- Prior to operating any piece of equipment, employees are required to refer to specific safe operating rules and procedures.
- All hazardous substances are to be labeled as per the WHMIS regulations and are to be handled as prescribed in the area work procedures or by the Material Safety Data Sheets (MSDS).
- Hazardous substances must be stored and transported only in approved containers. Disposal of hazardous materials must comply with environmental disposal rules for plant wastes.
- All workplace injuries and illnesses must be promptly reported to Management.
- All accidents, property damage, fires and spills are to be reported immediately to Management.
- Long hair, jewelry, or loose clothing is not permitted where there is a risk of entanglement. Hair may be tied up or otherwise confined.
- Employees shall not store or consume food or beverages near hazardous materials.
- Employees will not be working under the influence of drugs or alcohol.

Violation of these general safety rules may result in the issuance of a verbal warning and potentially formal discipline accompanied by re-instruction on the safety rule depending on the severity of the incident. Further violations may result in progression to the next step in the Progressive Discipline Policy up to and including termination of employment.

4.3 Workplace Hazardous Materials Information Systems (WHMIS) Compliance Policy

Intent

This policy is intended to communicate WHMIS procedures and guidelines.

Scope

This policy applies to all employees always and without exception.

Unionized employees shall adhere to their current Collective Agreement for policies governing WHMIS compliance. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

This policy has been developed to incorporate the legislative requirements of Alberta, British Columbia and Ontario and shall be updated accordingly should the employer expand its operations into additional provinces.

Guidelines

The employer values the safety and well-being of its employees, and will work with them to provide every reasonable safety measure possible. WHMS training and education is especially important due to the nature of services the organization provides. In compliance with all relevant legislation and as a duty to its employees to protect their health and safety, the employer will:

1. Meet all legislative standards as outlined in provincial Occupational Health and Safety Acts, and ensure that information and training on hazardous materials is provided to all staff.
2. Ensure that all controlled products are labelled or identified with appropriate WHMIS labels; and that all containers that contain hazardous materials have appropriate labels.
3. Ensure that Material Safety Data Sheets (MSDS) are available for all controlled products in the workplace to provide additional information and detail hazard and precautionary information and that they are no more than three years old.
4. Ensure that all workplace hazardous materials include the appropriate supplier labels and MSDS.
5. Ensure that employees have full access to supplier labels and MSDS information.
6. Ensure that until the supplier container is empty, the supplier label is not deliberately removed, destroyed or changed;

Training and Education

The employer shall provide appropriate WHMIS training and education for all staff members who are exposed or likely to be exposed to hazardous materials in the performance of their regular job duties. WHMIS training and education shall be tailored to the position the employee holds with the company and the frequency with which they are exposed to controlled and hazardous substances.

The employer, in conjunction with the Joint Health and Safety Committee, will review training and education programs and content annually, and revise where necessary. In the event of any changes, staff will be trained and educated regarding the change(s).

Employee Responsibilities and Rights

All employees that are active with products pertaining to this training must participate in WHMIS training and education.

Employees must report any violation of the Act, Code or regulations to management or a Joint Health and Safety Committee representative.

All employees have the right to know about the hazardous materials they are exposed to on the job. This includes:

- The right to review labels and MSDS, to receive instruction and training.
- Employees have the right to be included in discussions regarding the content of the program, the amount of training, who is to receive what training, who delivers the training, etc.

Workplace Hazardous Material Information System (WHMIS)

Both federal and provincial regulation direct employers to establish and enforce specified Workplace Hazardous Material Information System (WHMIS) procedures. The attached WHMIS Program has therefore been incorporated and will apply to all employees.

1. Program Components

The employer's Worksite Hazardous Material Information System consists of the following components:

- Product Classification
- Material Safety Data Sheets (MSDS)
- Labelling
- Handling Procedures
- Emergency Procedures
- Employee Education
- Program Audit
- Responsibility

2. Product Classification

All hazardous materials classified as controlled products under the Federal Hazardous Products Act (HPA) and provincial Occupational Health & Safety Acts (OHSA) shall be handled in accordance with the employer's WHMIS Program.

In general, controlled products are any product, material or substance identified, classified or categorized under the HPA or OHSA as:

- Compressed Gas
- Flammable or Combustible Material
- Oxidizing Material
- Poisonous or Infectious Material
- Corrosive Material and
- Dangerously Reactive Material

3. Material Safety Data Sheets (MSDS)

A Material Safety Data Sheet is a technical document, produced and distributed by the supplier of a controlled product, which provides detailed and comprehensive information on the controlled product regarding:

- Health effects of overexposure to the product
- Hazard evaluation regarding the product's handling, storage or use
- Measures to protect workers at risk of overexposure
- Emergency procedures

Material Safety Data Sheets are dated and valid for three years, after which time they must be replaced with an updated edition. It is the responsibility of the Joint Health and Safety Committee to ensure all MSDS' are up to date.

4. Labelling

All controlled products will have a supplier label identifying the following product information:

- Product identifier
- Supplier identifier
- Availability of Material Safety Data Sheet
- Hazard symbol
- Information for safe use of the product and risk phrases
- Precautionary measures
- First aid measures

Labels are a source of information on a controlled product designed to alert employers and employees in an easily understood way to the hazards of the product and the precautions to be taken. A label may be a mark, sign, stamp, device, seal, sticker, ticket, tag or wrapper and must be attached to, or imprinted, stencilled or embossed on the controlled product or a container of the product. Labels may be:

1. Provided by the product supplier; or
2. Produced locally by the workplace for materials manufactured/produced locally, by-products, or bulk materials that are repackaged or rebottled.

Should the label be necessarily small, labels will have as a minimum:

- Product identifier
- Hazard symbol
- Precautions to be taken
- Availability of Material Safety Data Sheet

5. Handling Procedures

In the event that a Material Safety Data Sheet does not detail adequate handling information for the employer's use, storage or handling of a controlled product and/or the use of protective equipment or clothing associated with the controlled product, written instructions and procedures will be created and will be made readily accessible for workers.

6. Emergency Procedures

In the event that a Material Safety Data Sheet does not detail adequate emergency information for the containment, cleanup and disposal of a spill or emission release of a controlled product, or for the first aid and health and safety response for an overexposure to the controlled product, written instructions and procedures will be created and will be made readily accessible for workers as appropriate.

7. Employee Education

All employees who work with or in the proximity of a controlled product will receive WHMIS education, which will consist of:

- Introduction to WHMIS regulations.
- How to read and understand the meaning of symbols and terminology on Material Safety Data Sheets and Labels.
- Use, handling and storage of each controlled product used by the employee.
- Use of protective equipment and clothing associated with the handling of each controlled product.
- Safety/emergency measures associated with each controlled product, including containment, clean up and disposal of spills or emission releases, plus first aid measures and health & safety responses (including the use of any equipment or technique) in the event of overexposure or potential for overexposure to a controlled product.

8. Program Audit

- Each property will be audited once a year to verify ongoing applicability and compliance with each component of the WHMIS Program.

9. Responsibility

- Each manager is responsible for administering and enforcing all components of the WHMIS program throughout their scope of operation and responsibility.
- Managers will have their employees undertake appropriate WHMIS education prior to working with or near a controlled product.
- All employees are responsible for learning and applying relevant components of the WHMIS program.

For more Information regarding WHMIS:

Alberta:

http://employment.alberta.ca/documents/whs/whs-pub_ch007.pdf

Ontario:

http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_900860_e.htm#BK5

British Columbia:

<http://www2.worksafebc.com/topics/whmis/RegulationAndGuidelines.asp>

4.4 Personal Protective Equipment (PPE) Policy

Intent

The employer has adopted this policy to ensure the health and safety of staff who operate machinery/equipment and to communicate the necessary personal protective equipment requirements.

Scope

This policy applies to all employees always and without exception.

Unionized employees shall adhere to their current Collective Agreement for policies governing personal protective equipment. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

This policy has been developed to incorporate the legislative requirements of Alberta, British Columbia and Ontario and shall be updated accordingly should the employer expand its operations into additional provinces.

Guidelines

To ensure employee safety, personal protective equipment is to be utilized in all appropriate situations to eliminate or mitigate the potential for injury.

The employer will meet all legislative requirements under the Ontario Occupational Health and Safety Act, BC's Occupational Health and Safety Regulations and Alberta's Occupational Health and Safety Code, regarding the use and provision of PPE.

1. The employer will perform workplace hazard assessments and determine the appropriate forms of PPE for eliminating and/or mitigating the risk of injury.
2. Following the risk assessment, if elimination, substitution, engineering, and administrative controls do not effectively control the hazard, PPE may be deemed necessary, either alone or in addition to other measures, to help protect workers.
3. Where a form of PPE is required, all persons that will be required to perform work that involves a hazard, or will be in contact with or reasonably expected to encounter a potential hazard, shall be required to utilize appropriate forms of PPE.
4. All PPE used shall meet the requirements of the Occupational Health and Safety Act/Code governing their province of employment.
5. All PPE shall be used and maintained in accordance with the manufacturer's recommendations.
6. The employer issued PPE shall be inspected prior to each use and will be inspected annually to assess wear and tear. PPEs that are heavily used will be inspected more frequently.
7. Any PPE that is damaged or requires repair must be removed from service and tagged "out of service".
8. Any PPE that has been tagged "out of service" may not be returned to service until it has been repaired and inspected by a qualified and competent person.
9. If any damaged or malfunctioning PPE cannot be repaired, it shall be disposed of properly and replaced.

10. The employer issued PPE may not be modified or changed in any way that contravenes the manufacturer's instructions or specifications, or in such a way that would contravene applicable health and safety legislation.

Employees required to utilize personal protective equipment in the performance of their jobs, such as kitchen, maintenance and housekeeping staff, will be provided with a PPE specific to their role and department. Information pertaining to the required PPE will be communicated during the employee's orientation or when new processes, procedures or equipment are introduced in the workplace. Employees are requested to refer to their manager for further information concerning the use of PPE in their department.

Occasionally employees will be required to supply and maintain in good condition their own form of PPE which must meet the employer's strict requirements. For example, all employees are expected to wear appropriate footwear for their position and the type of work to be performed. For most employees, this includes a requirement that shoes have flat soles, be comfortable enough to facilitate long periods of standing, have non-slip grips and not have open toes.

4.5 Workplace Anti-Harassment/Bullying Policy

Intent

The employer is committed to ensuring a safe, productive and healthy working environment which is based on mutual respect. In pursuit of this goal, the employer does not condone and will not tolerate acts of harassment/bullying against or by any employee.

Our workplace anti-harassment/bullying policy is not meant to stop free speech or to interfere with everyday interactions. Usually, harassment can be distinguished from normal, mutually acceptable socializing. It is important to remember it is the perception of the receiver of the potentially offensive message be it spoken, a gesture, a picture or some other form of communication that determines whether something is acceptable or not.

Making a false complaint or providing false information about a complaint is prohibited and a violation of this Anti-Harassment/Bullying Policy. Individuals who violate this policy are subject to disciplinary and/or corrective action, up to and including termination of employment.

Scope

This policy applies to all individuals working for the organization including front line employees, temporary employees, contract service providers, contractors, management, officers or directors.

Unionized employees shall also be subject to the requirements of this policy, but may be subject to the Union's grievance process for the filing of a formal complaint. Unionized employees are requested to refer to their current Collective Agreement for further information. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

Guidelines

The employer will not tolerate any form of harassment or discrimination against anyone at anytime, on any grounds. This commitment applies to all areas including hiring, training, performance assessment, promotions, transfers, layoffs, remuneration, guest services and all other employment practices and working conditions.

All employees are personally accountable and responsible for enforcing this policy and must make every effort to prevent discrimination or harassing behaviour and to intervene immediately if they observe a problem or if a problem is reported to them.

Canada's Criminal Code deals with matters such as violent acts, threats and behaviours such as stalking. The police should be contacted immediately when an act of violence has occurred in the workplace or when someone in the workplace is threatened with violence. If anyone on any property feels threatened, then an immediate call to 911 is required.

It is important to realize that unfounded/frivolous allegations of personal harassment may cause both the accused person and the company significant damage. If it is determined by the company that any employee has knowingly made false statements regarding an allegation of personal harassment, immediate disciplinary action will be taken. As with any case of dishonesty, disciplinary action may include immediate dismissal.

Definitions

Personal Harassment - is any unsolicited, unwelcome, disrespectful or offensive behaviour or comment with an underlying sexual, bigoted, ethnic or racial connotation and can be typified as:

- Behaviour that is hostile in nature, and/or intends to degrade an individual based on personal attributes, including age, race, nationality, disability, family status, religion, gender, sexual orientation, and/or any other Human Rights protected grounds.
- Sexual solicitation or advance made by a person able to confer, grant or deny a benefit or advancement to the person where the person making the solicitation or advance knows or ought reasonably to know that it is unwelcome;
- Reprisal or a threat of reprisal for the rejection of a sexual solicitation or advance where the reprisal is made or threatened by a person able to confer, grant or deny a benefit or advancement to the person.
- Unwelcome remarks, jokes, innuendoes, propositions, or taunting about a person's body, attire, sex or sexual orientation and/or religion;
- Suggestive or offensive remarks;
- Bragging about sexual prowess;
- Offensive jokes or comments of a sexual nature;
- Unwelcome language related to gender;
- Displaying of pornographic or sexist pictures or materials;
- Leering (suggestive persistent staring);
- Physical contact such as touching, patting, or pinching, with an underlying sexual connotation;
- For the most part, victims of sexual harassment are female. However, conduct directed by female employees towards males and between persons of the same sex can also be held to constitute sexual harassment.
- Any actions that create a hostile, intimidating or offensive workplace. This may include physical, verbal, written, graphic, or electronic means.
- Any threats of physical violence that endangers the health and safety of the employee.

Racial and Ethnic Harassment - is defined as any conduct or comment which causes humiliation to an employee because of their racial or ethnic background, their colour, place of birth, citizenship or ancestry. Examples of conduct which may be racial or ethnic harassment include:

- Unwelcome remarks, jokes or innuendos about a person's racial or ethnic origin, colour, place of birth, citizenship or ancestry;
- Displaying racist or derogatory pictures or other offensive material;
- Insulting gestures or practical jokes based on racial or ethnic grounds which create awkwardness or embarrassment;
- Refusing to speak to or work with someone or treating someone differently because of their ethnic or racial background.

Workplace Violence or Bullying - is the exercise of physical force by a person against a colleague, that causes or could cause physical injury to the colleague and/or a statement or behaviour that is reasonable for a person to interpret as a threat to exercise physical force against them, that could cause physical injury to the employee.

If you believe you have been personally harassed, you should make a written complaint to management. The written complaint should include:

- the approximate date and time of the incident you wish to report
- the name of the person or persons involved in the incident
- the name of any person or persons who witnessed the incident
- a full description of what occurred in the incident

Once a written complaint has been received, the employer will complete a thorough investigation. Where a union is in operation, the employer shall work with the union and provide the union with the results of the investigation upon written request. Harassment will not be ignored; silence can, and often is, interpreted as acceptance.

The investigation will include:

- informing the harasser/respondent of the complaint
- interviewing the complainant, any other person involved in the incident and any identified witnesses
- interviewing any other person who may have knowledge of the incidents related to the complaint or any other similar incidents

A copy of the complaint, detailing the complainant's allegations, is then provided to the respondent(s).

- The respondent is invited to reply in writing to the complainant's allegations and the reply will be made known to the complainant before the case proceeds further.
- The Company will do its best to protect from unnecessary disclosure the details of the incident being investigated and the identities of the complaining party and that of the alleged respondent.
- During the investigation, the complainant and the respondent will be interviewed along with any possible witnesses. Statements from all parties involved will be taken and a decision will be made.
- If necessary, the Company will employ outside assistance or request the use of legal counsel.
- Where it is determined that harassment has occurred, a written report of the remedial action will be given to the employees concerned.
- A copy of the complaint will be put in the personnel files of everyone involved in the incident.

Even if the complainant decides not to lay a formal complaint, senior management may decide that a formal complaint is required (based on the investigation of the incident) and will file such document(s) with the person(s) against whom the complaint is laid (the respondent(s)).

If it is determined by the company that any employee has been involved in the harassment of another employee, immediate disciplinary action will be taken. Such disciplinary action may involve counselling, a formal warning or immediate dismissal.

Neither the name of the person reporting the facts nor the circumstances surrounding them will be disclosed to anyone whatsoever, unless such disclosure is necessary for an investigation or disciplinary action. Any disciplinary action will be determined by the Company and will be proportional to the seriousness of the behaviour. The employer will also provide appropriate assistance to any employee who is a victim of discrimination or harassment.



Employees will not be demoted, dismissed, disciplined or denied a promotion, advancement or employment opportunities because they rejected sexual advances of another employee or because they lodged a harassment complaint when they honestly believed they were being harassed.

4.6 Reporting Workplace Injuries - Compliance Policy

Intent

This policy has been developed in compliance with WSIB (Ontario), the Worker's Compensation Board of Alberta and the WorkSafeBC's reporting requirements to communicate the procedures and guidelines pertaining to the reporting of workplace injuries.

Scope

This policy applies to all employees always and without exception.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to reporting workplace injuries. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

Please note: the reporting guidelines and procedures in this policy do not negate the reporting requirements required by government agencies for specific critical injuries or injuries resulting in bodily harm. Please refer to the company's Workplace Accident Investigation Policy for specific reporting requirements as required by provincial Occupational Health and Safety legislation.

This policy has been developed to incorporate the legislative requirements of Alberta, British Columbia and Ontario and shall be updated accordingly should the employer expand its operations into additional provinces.

Guidelines

The employer will comply with all required federal and provincial regulations, legislation and workplace compliance issues regarding the correct reporting of any workplace injuries and occupational illnesses and will strive to prevent any potential occurrences through the implementation of health and safety policies and programs.

The employer will report all the following workplace injuries as required by provincially mandated reporting requirements:

British Columbia:

- The worker loses consciousness following the injury.
- The worker is transported or recommended by a first aid attendant or other employer representative to go to a hospital or other place of medical treatment.
- The injury is one that obviously requires medical treatment.
- The worker has received medical treatment for the injury.
- The worker is unable or claims to be unable because of the injury, to return to his or her usual job function on any working day after the day of injury.
- The injury or accident resulted or is claimed to have resulted in the breakage of eyeglasses, dentures or a hearing aid.
- The worker or WorkSafeBC has requested that an employer's report be sent.

Alberta:

- Worker requires health care and/or;
- An injury that causes or is likely to cause the worker to be off the job beyond the day of the injury.
- Injury that requires modified work beyond the day of the injury.
- Injury that requires on-going medical attention.
- Injury causing permanent disability.

Ontario:

- Worker requires health care and/or;
- Is absent from regular work.
- Requires modified work at less than regular pay.
- Requires modified work at regular pay for more than seven calendar days following the date of accident.

When deciding whether to report an accident where a worker requires modified work at regular pay for more than seven calendar days, the employer will consider that:

1. Shift workers, or those on irregular work patterns, may not be scheduled to work on the eighth calendar day. In these cases, the employer will report the accident if the worker requires modified work on the first shift that follows the eighth calendar day.
2. The seven-calendar day period is not reset for workers that initially require modified work for less than seven calendar days, return to regular work for a brief period, and then require further modified work. In these cases, the requirement to report is based on whether the worker requires modified work after the initial seven calendar days following the date of accident.
3. The employer will report an accident when an employee initially returns to work, but then requires modified work for more than seven calendar days. The use of calendar days reflects the notion that if an injury affects the worker's ability to perform regular work after a week, health care is likely to be sought, regardless of the number of days worked.

The employer will report the accident to the WSIB/WCB/WorkSafeBC when a worker is injured, and the treatment received could only have been administered by a health care practitioner.

The employer will not report the accident to the WSIB/WCB if first aid is provided to a worker by a:

- Co-worker, manager, lay person, or
- Health care practitioner, when the first aid did not require the professional skills of that practitioner.

The employer will report when a worker has been exposed to, or is suspected of having been exposed to, an infectious disease.

The employer will report accidents using:

British Columbia:

- WorkSafeBC's Employer's Report of Injury or Occupational Disease
- WorkSafeBC-approved electronic reporting form.

Alberta:

- http://www.wcb.ab.ca/pdfs/employers/c040_instn.pdf
- WCB-approved electronic reporting form.

Ontario:

- The employer's Report of Injury/Disease Form 7 (Form 7) (see www.wsib.on.ca);
- WSIB-approved electronic reporting form.

Where required under the regulations of provincial Health and Safety Acts/Codes, the employer will provide information to their Joint Health and Safety Committees. If a photocopy of the accident/injury report form is used for this purpose, personal information (e.g., the employee's social insurance number, telephone number, earnings information, and pre-existing medical conditions) will be removed.

As soon as possible after an accident, workers are required to file a claim for benefits. They will also consent to disclose their functional abilities information, which is provided by the treating health care professional.

Injured employees will give a copy of the claim for benefits to both the WSIB/WCB/WorkSafeBC (whichever is applicable) and the employer. In the case of occupational diseases, employees will give a copy of the claim to the department to which the disease is associated.

The employer will ensure to adhere to the specific reporting timelines established by the WSIB (Ontario), the WCB Alberta and the WorkSafeBC upon learning of the worker injury/illness.

Province	Reporting Requirements
British Columbia	Within three business days of the injury's occurrence or within three business days of you or your representative becoming aware of the injury.
Alberta	72 hours after receiving notice or knowledge of the illness/injury.
Ontario	Seven business days of the employer learning of the reporting obligation. (Business days are Monday to Friday, and do not include statutory holidays).

Employees will receive a copy of the accident report that is provided to the WSIB/WCB/WorkSafeBC (including any additional information provided by the employer).

Employees should complete, sign and return required reporting forms as soon as possible following a work-related injury or becoming aware of an illness. The following table lists worker reporting deadlines as specified by the WSIB, WCB Alberta and WorkSafeBC.

Province	Reporting Requirements
Alberta	Workers have two years from the date of injury or discovering the illness to provide report to the WCB
Ontario	Claim must be filed within six months of an accident or learning of a disease.
British Columbia	Workers have one year from the date of the injury or discovering the illness to provide report to WorkSafeBC.

If the employee does not file the claim for benefits, or consent to the disclosure of functional abilities information within the designated timeframe, the WSIB/WCB/WorkSafeBC will not provide benefits unless, in its opinion, it is just to do so.

Due to the serious nature of workplace injuries and the importance of accurate and timely reporting, employees are expected to fulfill their obligations regarding the correct reporting of workplace injuries.

If a workplace accident is not properly reported, the employer may be subject to the penalties from the WSIB/WCB/WorkSafeBC.

REFERENCES

British Columbia:

<http://www.worksafebc.com/claims/default.asp>

Alberta:

<http://www.wcb.ab.ca/>

Ontario:

www.wsib.on.ca

4.7 Workplace Accident Investigation Policy

Intent

The Workplace Accident Investigation policy is intended to provide investigatory procedures in compliance with provincial legislation in the event of a workplace accident. Accurate documentation, proper reports and investigations of workplace accidents will increase the company's overall readiness to identify and resolve workplace safety issues, reduce workplace injuries, and increase efficiency.

Scope

This policy applies to all employees always and without exception.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to this policy. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

Please note: the reporting guidelines and procedures noted in this policy do not negate the reporting requirements required by WSIB/WCB/WorkSafeBC. Please refer to the company's Reporting Workplace Injuries - Compliance Policy for specific reporting requirements as required by the WSIB, WCB and WorkSafeBC.

This policy has been developed to incorporate the legislative requirements of Alberta, British Columbia and Ontario and shall be updated accordingly should the employer expand its operations into additional provinces.

Guidelines

The employer will comply with all required federal and provincial regulations, legislation and workplace compliance issues regarding health and safety, the correct reporting of any workplace injuries, and will strive to prevent workplace injuries through the implementation of health and safety policies, procedures and programs.

When an accident occurs a member of the Joint Health and Safety Committee should immediately be contacted for an investigation to be started, even if the injured employee is not available. The following should be determined (but not limited to):

1. Identify root causes using "Basic/Root Cause Checklist".
2. Determine and implement temporary or, if possible, long term corrective measures to address root causes.
3. Complete an accident investigation form and provide copies to the Joint Health and Safety Committee.
4. Ensure that copies of all records reviewed (training records, maintenance records, work procedures, safety talks, equipment drawings) are attached to the accident investigation.
5. Schedule follow-up to review effectiveness of the temporary and long-term corrective measures implemented.

**The purpose of an accident investigation is to identify the root causes of the accident and to put into place corrective measures to prevent a reoccurrence of the accident. The assessment of blame is not part of an accident investigation.*

Basic/Root Causes of Many Accidents

<p>Physical/Physiological</p> <ul style="list-style-type: none"> • Inappropriate height or reach; • Inappropriate weight or size; • Limited ability to sustain body positions; • Temporary disabilities; • Fatigue due to task load or duration; • Fatigue due to sensory overload; and • Constrained movement. 	<p>Mental or Psychological</p> <ul style="list-style-type: none"> • Confusing directions; • Conflicting demands; • Preoccupation; • Frustration; • Routine, monotony; and • Extreme judgment/decision demands.
<p>Knowledge/Skill</p> <ul style="list-style-type: none"> • Lack of experience; • Inadequate orientation; • Inadequate initial training/instruction; • Inadequate update training/instruction; • Misunderstood directions; • Inadequate practice; and • Infrequent performance. 	<p>Tools and Equipment</p> <ul style="list-style-type: none"> • Inadequate standards or specifications; • Inadequate availability; • Inadequate adjustment/repair/maintenance; • Inadequate inspection and/or monitoring; • Improper loading or rate of use; • Used by unqualified or untrained people; and • Used for wrong purpose.
<p>Motivation and Supervision</p> <ul style="list-style-type: none"> • Improper attempt to save time; • Improper attempt to avoid discomfort; • Inadequate performance feedback; • Unclear or conflicting assignment of responsibility; • Inadequate work planning; • Inadequate reference documents, directives, guidance publications; • Lack of supervisory/management job knowledge; • Inadequate matching of individual qualifications and job/task requirements; • Inconsistent application of standards, procedures, rules; and • Inadequate monitoring use of standards, procedures and/or rules. 	<p>Engineering</p> <ul style="list-style-type: none"> • Inadequate assessment of loss exposure; • Inadequate consideration of human factors or ergonomics; • Inadequate standards, specifications, design criteria; • Inadequate assessment of operational readiness; • Inadequate monitoring of initial operation; and • Inadequate evaluation of changes.

There is a legal requirement to report certain incidents or critical injuries to provincial government agencies. Below are tables outlining provincially-specific reporting obligations:

Alberta

Per Alberta's Occupational Health and Safety Act, injuries and incidents must be reported to the Government of Alberta if they:

Type of Accident	Reporting Timeline
Result in a death	Immediately notify Alberta's Workplace Health and Safety Contact Centre
Cause a worker to be admitted to hospital for more than two days	Immediately notify Alberta's Workplace Health and Safety Contact Centre *
Involve an unplanned or uncontrolled explosion, fire or flood that causes or has the potential to cause a serious injury	Immediately notify Alberta's Workplace Health and Safety Contact Centre**
Involve the collapse or upset of a crane, derrick or hoist	Immediately notify Alberta's Workplace Health and Safety Contact Centre**
Involve the collapse or failure of any component of a building or structure necessary for the structural integrity of the building or structure	Immediately notify Alberta's Workplace Health and Safety Contact Centre**

* Per Alberta's Occupational Health and Safety Act, employers are required to err on the side of caution when providing a report of an employee who is admitted to the hospital for more than two days. If an employer believes the injury will result in the employee's admittance to the hospital for more than two days, then the report should be filed immediately. If the employer is unsure, a report should be provided regardless. Employers are required to exercise due diligence and act within a reasonable time when providing the report. Should a minor injury that seemingly would not require hospital admittance for more than two days require such a timeframe, the employer is required to provide a report as soon as they become aware that the length of stay will be greater than two days. The employer must exercise due diligence and take all steps reasonably practical to ascertain this information.

** Employers must provide a report regarding such instances as soon as reasonably practical, for example after the fire or flood has been safely contained or controlled.

Ontario

Per Ontario's Occupational Health and Safety Act, the following requires reporting to the Ministry of Labour:

Type of Accident	Reporting Timeline
Critical Injury as defined below	Immediately notify the Ministry of Labour by phone or other direct means and provide a written report within 48 hours
Accident, explosion or fire where a worker is disabled or requires medical attention	Notify the Joint Health and Safety Committee within four days of the incident, and provide written report to the Ministry of Labour if required by the inspector
Where an employer has been told that an employee or former employee has an occupational illness	Written report must be supplied to the Ministry of Labour within four days

As defined in Regulation 834, of Ontario’s Occupational Health and Safety Act, a "critical injury" is an injury of a serious nature that:

- a) Places life in jeopardy;
- b) Causes unconsciousness;
- c) Results in substantial blood loss;
- d) Involves the fracture of a leg or arm but not a finger or toe;
- e) Involves the amputation of a leg, arm, hand or foot but not a finger or toe;
- f) Consists of burns to a major portion of the body; or
- g) Causes the loss of sight in an eye(s).

British Columbia

Per British Columbia’s Workers’ Compensation Act, the employer must immediately notify WorkSafeBC of the occurrence of any accident that:

Type of Accident	Reporting Timeline
Any incident that kills, causes risk of death, or seriously injures a worker	Immediately notify WorkSafeBC via their emergency and accident reporting phone line
Any blasting accident that results in injury, or an unusual event involving explosives	Immediately notify WorkSafeBC via their emergency and accident reporting phone line
A driving incident that causes death, injury, or decompression sickness requiring treatment	Immediately notify WorkSafeBC via their emergency and accident reporting phone line
A major leak or the release of a dangerous substance	Immediately notify WorkSafeBC via their emergency and accident reporting phone line
A major structural failure or collapse of a structure, equipment, construction support system or excavation	Immediately notify WorkSafeBC via their emergency and accident reporting phone line
Any serious mishap	Immediately notify WorkSafeBC via their emergency and accident reporting phone line

1. When notified of a critical injury/injury causing bodily harm a management representative will immediately proceed to the accident scene and ensure that the area is secured and remains undisturbed until released by a government inspector. The scene of the incident/accident may only be disturbed to:
 - Attend to any persons who may have been injured or killed
 - Prevent any further injuries or death
 - Protect property that is endangered because of the accident
2. Management will contact a member of the Joint Health and Safety Committee and any other individual knowledgeable about the type of work involved and will conduct a joint investigation of the accident with those individuals.
3. Management will call the required reporting centre as determined by their province of employment. Keep detailed notes as to the times of all calls, the name of the officer(s) spoken to, and details of the discussions.

4. If the root causes of the accident and corrective actions are identified, review these with the government official. Have the safety committee member present to talk with the official to confirm what has taken place.
5. If the accident investigation has been completed and the official agrees with the corrective actions, they will release the accident scene and plan to investigate the following day. If the official decides to investigate immediately, the accident scene must remain secured until the investigation has been completed. Arrange to have copies of all relevant documentation such as training records, maintenance records, work procedures, etc. available for the official.
6. Where corrective actions have been identified, and agreed upon, the employer will implement these corrective actions immediately to prevent the recurrence of such an event. A completed report of the actions taken will be submitted to the Joint Health and Safety Committee.
7. Complete and submit, where required, documentation to the appropriate government agency notifying them of the critical injury; this may also include a copy of the completed accident investigation.

4.8 Injury Claims Policy

Intent

This policy is designed to provide employees with a set of guidelines so that all workplace injury claims are handled in the correct manner, ensuring employees are provided with the benefits they require in a timely manner.

This policy has been developed using the WSIB (Ontario), WCB (Alberta) and WorkSafeBC as guidelines.

Scope

This policy applies to all employees always and without exception.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to this policy. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

Please note: the reporting guidelines and procedures noted in this policy do not negate the reporting requirements required by WSIB/WCB/WorkSafeBC. Please refer to the company's Reporting Workplace Injuries - Compliance Policy for specific reporting requirements as required by the WSIB, WCB and WorkSafeBC.

This policy has been developed to incorporate the legislative requirements of Alberta, British Columbia and Ontario and shall be updated accordingly should the employer expand its operations into additional provinces.

Guidelines

In the event of a workplace injury or occupational disease, the employer will comply with all federally and provincially mandated legislation as well as relevant WSIB/WCB/WorkSafeBC regulations. It is in everyone's best interest to ensure that injured workers receive benefits for their injuries where appropriate, as this will assist them in coping with the injury, and facilitate their recovery.

Any employee who is entitled to receive benefits under the WSIB/WorkSafeBC/WCB insurance plan is required to:

- Provide the WSIB/WCB/WorkSafeBC with any information necessary to adjudicate the claim;
- Co-operate in health care measures the WSIB/WCB/WorkSafeBC considers appropriate;
- Undergo an examination by a health professional selected and paid for by the WSIB/WCB/WorkSafeBC where required;
- Undergo an examination by a health professional selected and paid for by the employer if directed by the WSIB/WCB/WorkSafeBC;
- Co-operate in the Early and Safe Return to Work (ESRTW) program;
- Co-operate in all aspects of work reintegration assessments and plans;
- Co-operate in all aspects of return to work (RTW) placement programs.

If the employee fails to meet these obligations, the WSIB/WCB/WorkSafeBC benefits may be reduced or suspended. *The decision to reduce or suspend WSIB/WCB benefits is not at the discretion of the employer, and is made by the WSIB/WCB/WorkSafeBC.*

It is expected that the WSIB/WCB/WorkSafeBC will determine appropriate and reasonable health care measures based on their extensive experience in handling similar cases, and will maintain the best interests of the employee always.

In accordance with the requirements of the WSIB/WCB/WorkSafeBC, employees will be required to provide the WSIB/WCB with all necessary and/or requested information to assist them in the process of claims management.

If an employee is required by the WSIB/WCB/WorkSafeBC to obtain pertinent employment and/or claims related information from a third party, and fails to do so, the WSIB/WCB/WorkSafeBC will review the case to determine if all reasonable steps to acquire the information were taken. If the WSIB/WCB/WorkSafeBC is not satisfied that all reasonable steps have been taken, or where the employee simply fails to provide the necessary information, the WSIB/WCB/WorkSafeBC may reduce or suspend the provision of benefits until the employee can produce the required information.

Examples of non-co-operation may include:

- Changing health care professional without WSIB/WCB/WorkSafeBC approval;
- Not following prescribed treatment;
- Intentionally abusing prescription medication; or
- Missing appointments with health care practitioners.

If an employee produces a legitimate reason for their inability to follow the prescribed plan of treatment, the WSIB/WCB/WorkSafeBC will consult their health care staff to consider the rationale and determine the availability of acceptable alternatives.

If the WSIB/WCB/WorkSafeBC directs the employer to request a health examination, the employee will be required to undergo the examination as directed. If an employee fails to do so, the WSIB/WCB/WorkSafeBC may reduce or suspend benefits until the employee cooperates.

The employer will communicate effectively with the WSIB/WCB/WorkSafeBC regarding the return to work process and employees are required to cooperate; if an employee fails to cooperate with the process, the WSIB/WCB/WorkSafeBC may reduce or suspend benefits until the employee cooperates. Employees will be required to co-operate by:

- Participating in the preparation of the program;
- Fulfilling the mutually agreed upon commitments outlined in the program (such as modified duties), and taking into consideration penalties for non-compliance as per WSIB/WCB/WorkSafeBC.

If it is determined that an employee has committed a claims-related offence or fraud, the WSIB/WCB/WorkSafeBC will reduce or suspend their benefits in accordance with the provincially specified penalties of the WSIB/WCB/WorkSafeBC.

4.9 Reasonable Accommodation Policy

Intent

The employer will work to achieve a workplace free of barriers by providing accommodation for those individuals requiring it. Every effort will be made such that the impact of accommodation will not affect other employees.

Scope

This policy applies to all employees, and candidates for employment always and without exception.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to reasonable accommodation. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

This policy has been developed to incorporate the legislative requirements of Alberta, British Columbia and Ontario and shall be updated accordingly should the employer expand its operations into additional provinces.

Guidelines

The employer has adopted this policy to ensure that staff are provided with employment that is ethical and fair, and complies with all applicable employment and human rights legislation.

The employer will work with any individual requesting either permanent or temporary accommodation and ensure that the measures taken are both effective and mutually agreeable. The employer encourages individuals to make any needs for accommodation known to management, and to work with them to ensure the necessary work modifications are satisfactorily completed.

The employer shall provide accommodation as appropriate when possible, using a consultative approach that involves the company, the individual, and if appropriate, any applicable union representatives, healthcare professionals, and other third parties.

The following definitions for a person with a disability are sourced from the Human Rights Codes of the various provinces in which the employer currently operates:

Ontario

- Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, including diabetes mellitus, epilepsy, and any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, or physical reliance on a guide dog or on a wheelchair or other remedial appliance or device;
- A condition of mental impairment or developmental disability;
- A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder; or
- An injury or disability for which benefits were claimed or received under the Workplace Safety and Insurance Act.

Alberta

- Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness. This includes, but is not limited to, epilepsy; paralysis; amputation; lack of physical coordination; visual, hearing and speech impediments; and physical reliance on a guide dog, service dog, or wheelchair or another remedial appliance or device.
- Mental disability is defined as any mental disorder, developmental disorder or learning disorder, regardless of the cause or duration of the disorder.

British Columbia

- British Columbia's Human Rights Code does not give a definition of a mental or physical disability.
- Any employee requesting accommodation must make a request to their manager or immediate supervisor. The manager is responsible for ensuring that a written description of the accommodation plan is prepared for the employee.

In the creation of an accommodation plan, the employer will:

1. Determine objectives for performance in the role, and potential barriers.
2. Create a plan for achieving the objectives in an alternate manner.
3. Examine the options for accommodation, and select the most appropriate.
4. Where necessary, consider redesigning or restructuring the position.
5. Implement the accommodation process.
6. Provide training as appropriate.
7. Review and revise the plan based on feedback.

In some cases, due to an inability to accommodate an individual in their current role, management will be required to place the employee in a different yet lateral position. This may require the assistance of third parties with specialized expertise.

Where an employee is placed in an alternate position, the employer shall ensure that the employee has the requisite qualifications and skill-sets necessary for success in the position, can perform the tasks associated with the position, and that the employee agrees that the alternate work is acceptable. It is at management's discretion to implement a probationary period for the employee in the new role. Necessary training will be provided and all attempts will be made to ensure the success of the employee.

The union must cooperate in the accommodation process of any employee they represent.

Where the accommodation required necessitates an investment in materials, equipment or increased budget for the position, requests for financing must be directed to head office.

The employer will work to provide workplace accommodation up to the point of undue hardship. Undue hardship may occur where it is established that no forms of appropriate accommodation exist, or where the creation of accommodation would cause excessive costs that create undue hardship for the organization, or where the accommodation would create a health and safety hazard.

Any individual communicating the need for accommodation shall be considered in a manner that is non-discriminatory, and respectful of our Human Rights obligations.



Failure to comply with this policy may result in disciplinary action up to and including termination.

4.10 Disability Management Policy

Intent

The employer has adopted this policy to ensure that staff members are provided with appropriate rehabilitation and support programs designed to assist them in the recovery process from a serious illness or injury. The employer will provide a work environment that provides support for employees with disabling injuries, illnesses or chronic medical conditions, allowing them to have a suitable level of productivity and ensuring they continue to contribute to the success of the organization.

Scope

This policy applies to all employees requiring disability management in the work environment.

Bargaining members are requested to refer to their current Collective Agreement for specific details concerning disability management. Where a Collective Agreement is silent on the issue, this policy shall dictate disability management procedures for unionized employees. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

Guidelines

Employees will be provided with a long-term disability plan through a contract with their employer hotel's insurance carrier. If an employee has been in receipt of LTD benefits and is then deemed fit to return to work, the employer will provide a return to work/accommodation plan to reintegrate the employee into his/her previous position or will find alternate suitable employment within the organization. The employer will work with the employee to modify job functions or tasks for the injured employee to allow them to successfully transition back into the work environment.

The employer will ensure the required task or environmental modifications are completed prior to the employee's return to work. Where job reassignment is necessary, a thorough internal job search will be conducted thus ensuring the employee is provided with available and suitable work that the employee can perform safely and competently.

If a thorough internal job search has been completed and no suitable work is available, the employer shall determine a reasonable course of action in consultation with management, a labour relations representative and/or legal counsel.

4.11 Accessible Customer Service Policy

Intent

This policy is intended to meet the requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*, and applies to the provision of goods and services to the public or other third parties, not to the goods themselves. The employer will meet this standard for all customers across the country, at all its properties.

All goods and services provided by the employer shall follow the principles of dignity, independence, integration and equal opportunity.

Scope

This policy applies to all employees always and without exception. This policy applies to the provision of goods and services on all premises owned and operated by the employer.

Unionized employees shall adhere to their current Collective Agreement for policies governing accessible customer service. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

The employer understands that not all staff members employed by the organization will be subject to the legal ramifications of Ontario's Accessibility Standards due to their geographic location and employment outside of the province of Ontario. Nonetheless, all employees of the organization shall be subject to the principles and requirements of this policy as the employer endeavours to treat all its clients equitably regardless of geographic location.

Definitions

Assistive Device – is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker, oxygen tank or anything that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Disability – the term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- a condition of mental impairment or a developmental disability;
- a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Guide Dog – is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

Service Animal – as reflected in *Ontario Regulation 429/07*, an animal is a service animal for a person with a disability if:

it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or

if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Service Dog – as reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability;
- or the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – as reflected in *Ontario Regulation 429/07*, a support person means, in relation to a person with a disability, another person who accompanies him or her to help with communication, mobility, personal care, medical needs or access to goods and services.

Guidelines

In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, this policy addresses the following:

- The Provision of Goods and Services to Persons with Disabilities;
- The Use of Assistive Devices
- The Use of Guide Dogs, Service Animals and Service Dogs
- The Use of Support Persons
- Notice of Service Disruptions
- Customer Feedback
- Training
- Notice of Availability and Format of Required Documents

The Provision of Goods and Services to Persons with Disabilities

The employer will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all customers and guests receive the same value and quality;
- allowing customers and guests with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- using alternative methods when possible to ensure that customers and guests with disabilities have access to the same services and in a similar manner;
- considering individual needs when providing goods and services; and

- communicating in a manner that considers the customer or guests' disability.

Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services.

For example, where elevators may be out of service and where an individual requires assistive devices for the purposes of mobility, the guest shall be accommodated on the main floor and a location that meets the needs of the individual.

Some assistive devices may be available at employer properties but will vary from location to location. Please refer to your manager in order to familiarize yourself with the complete list of your location's available assistive devices. In providing such devices, employees will be trained on the proper use and set up of such devices in order to ensure ease of use and proper functioning.

Guide Dogs, Service Animals and Service Dogs

A guest or customer with a disability that is accompanied by guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

A guest or customer with a disability that is accompanied by guide service dog will be allowed access to the hotels' food service areas that are open to the public unless otherwise excluded by law. Other types of service animals are not permitted into food service areas due to the Health Protection and Promotion Act, Ontario Regulation 562 Section 60.

Exclusion Guidelines

If a guide dog, service animal or service dog is excluded by law as detailed below, alternative methods will be offered to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

Applicable Laws

The Health Protection and Promotion Act, Ontario Regulation 562 Section 60, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. However, other types of service animals are not included in this exception.

Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds (such as pitbulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

Recognizing a Guide Dog, Service Dog and/or Service Animal

If it is not readily apparent that the animal is being used by the guest or customer for reasons relating to his or her disability, verification from the individual may be requested and may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

The guest or customer that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all times.

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, the employer will make all reasonable efforts to meet the needs of all individuals.

Support Persons

If a guest or customer with a disability is accompanied by a support person, both persons are allowed to enter the premises together and the guest/customer will not be prevented from having access to the support person. In situations where confidential information might be discussed, consent will be obtained from the guest/customer, prior to any conversation where confidential information might be discussed.

Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of the employer. In the event of any temporary disruptions to facilities or services that guests or customers with disabilities rely on, reasonable efforts will be made to provide notice. In some circumstances such as in the situation of unplanned temporary disruptions, notice may not be possible.

If a notification needs to be posted the following information will be included unless it is not readily available or known:

- goods or services that are disrupted or unavailable
- reason for the disruption
- anticipated duration
- a description of alternative services or options

When disruptions occur, notice will be provided by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the company's website or social media;
- contacting guests with reservations;
- verbally notifying customers and guests when they are making a reservation or checking in; or
- by any other method that may be reasonable under the circumstances.

Feedback Process

Any guest wishing to provide feedback can do so by emailing the general manager or other appropriately designated person, as found on the contact information page of the Hotel's website or social media.

Training

Training will be provided to:

- a) all employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of the employer.; for example: front of house staff, valets, housekeeping, food and beverage employees, other vendors; and,
- b) those who are involved in the development and approval of customer/guest service policies, practices and procedures.

As reflected in Ontario Regulation 429/07, regardless of the format, training will cover the following:

- A review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005.
- A review of the requirements of the Accessibility Standards for Customer Service, Ontario Regulation 429/07.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
 - use assistive devices;
 - require the assistance of a guide dog, service dog or other service animal; or
 - require the use of a support person (including the handling of admission fees).
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

4.12 First Aid Policy

Intent

The employer has adopted this policy to ensure the ongoing health and safety of our employees. The employer will ensure that appropriate first aid supplies are maintained and accessible, and that a trained and competent individual is always on-site to attend to any first aid needs of the company's employees.

Scope

This policy applies to all employees always, without exception.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to this policy. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

This policy has been developed to incorporate the legislative requirements of Alberta, British Columbia and Ontario and shall be updated accordingly should the employer expand its operations into additional provinces.

Guidelines

The employer will adhere to the specific legislative requirements pertaining to first aid in the workplace for each province in which it operates. Management will ensure that appropriate numbers of staff receive and maintain first aid and CPR training as required and training will be provided by a provincially-approved first aid training company; the cost of training will be covered by the employer and the employee will be compensated for their time with their regular wage rate. Management will also:

- Ensure first aid kits are adequately stocked with appropriate supplies as required by provincial legislation and that they are within quick and easy access to employees.
- Conduct first aid kit inspections on a quarterly basis and maintain records of these inspections.
- Ensure a copy of required first aid postings including the first aid certificates of trained employees, are displayed in high-visibility locations.
- Ensure emergency procedures and emergency phone numbers are posted at each first aid station.
- Report injuries that occur promptly, and accurately complete the required documentation.
- Ensure the timely investigation of all accidents that result in injury.
- Maintain an electronic database identifying the location of all first aid kits, the names of designated first aiders in each department/on each shift and the expiration date of any training or certification held.

All first aid records will be kept for a minimum of three years, will be held in strict confidence, and will be made readily available for inspection as required by law.

First Aid Procedures

1. In the event of an injury, first aid is to be administered immediately followed by proper medical treatment if necessary.

2. The first person on the scene of an injury should immediately contact the appropriate authorities and/or the closest qualified First Aid responder utilizing the appropriate emergency communication system such as the closest hotel phone, two-way radio or cell phone.
3. If the first person on the scene has appropriate First Aid/CPR training, they are directed to provide first aid/CPR in accordance with their level of training, using the first aid materials available.
4. As necessary, the first aider, or another nearby person will call 911.
5. The first aider will complete an injury treatment record for the incident.
6. A member of the Joint Health and Safety Committee will notify the injured person's emergency contact after the status of the injured persons' condition is known.
7. A member of the Joint Health and Safety Committee will document the incident and ensure a copy of the report is put in the employee's personnel file.

First aid kits will be clearly identifiable and will be kept clean, dry, ready for use and readily available at all times. When determining the type of kit(s) to be supplied in the workplace, the employer will adhere to the first aid kit schedule for the province of operation.

British Columbia:

WorkSafeBC's Occupational Health and Safety Guidelines Part 3: Occupational First Aid
<http://www2.worksafebc.com/Publications/OHSRegulation/Part3.asp#SectionNumber:3.14>

Alberta:

Occupational Health and Safety Code First Aid Schedule 2:
http://employment.alberta.ca/documents/whs/whs-leg_ohsc_2009.pdf

Ontario:

WSIB/CSPAAT Ontario Regulation 1101 First Aid Requirements.
<http://www.wsib.on.ca/files/Content/DownloadableFileFirstAidRequirementsreg1101/FAEng.pdf>

4.13 Lifting and Material Handling Procedures

Intent

The employer has adopted the following procedures for lifting and handling materials to ensure the ongoing health and safety of our employees, and to minimize the incidence of musculoskeletal injuries (MSI) in the workplace.

Scope

This policy applies to all employees always and without exception.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to Lifting and Material Handling Procedures. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

Guidelines

Prior to the manual lifting, pushing, pulling, handling, carrying or transportation of any materials that may cause strain or injury, the employee must examine the material and determine:

- Approximate weight of the load;
- Size and shape of the load;
- The distance that the load must be physically moved, either manually or with the assistance of a device; and
- The best possible solution for moving the load.

If a load is determined to be either too heavy or awkward to move manually, or where a device that could reasonably move the load is unavailable, the employee must consider alternate methods for moving the load.

Lifting Guidelines

- Maintain the natural curvature of your lower back – Note that when you are standing straight, your lower back has a natural curve, creating a slight hollow at the small of the back. When lifting, lowering or moving a load, try to maintain the curve as your spine and back are their most stable in this position.
- Use your core strength – By contracting your core abdominal muscles when lifting, lowering or moving materials, your body will naturally be more rigid and stable, reducing the incidence of injury.
- Avoid twisting – By twisting your back, stability is decreased, as you are no longer using the major muscles of your spine and core, and thus increase the probability of injury.
- Hold the load close to your body – By holding the load close to your body, you can avoid awkwardly bending over, and can use the major muscles in your body. Where appropriate, utilize protective clothing and/or gloves or PPE to avoid injuries that may occur because of holding sharp, dirty, hot, or cold objects close to the body.

Pushing and Pulling Guidelines

Where possible, push materials/loads. Pushing a load is easier as the human body can generate greater force when pushing as opposed to pulling, and you can lean your entire body weight into the load where necessary.

Where possible, use an appropriate transportation device (trolley, cart, wheelbarrow, etc.) to push a load.

Where a load is pulled, you increase the risk of injury due to:

- Running over the feet/ankles, or being struck by carts or trolleys;
- Strain injuries caused by pulling a load while facing the direction of travel, placing the shoulder and back in an awkward posture;
- Potential injuries caused due to an inability to see where you are going if you are pulling and walking backwards.

4.14 Drug and Alcohol Policy

Intent

The employer is committed to fostering an environment that is free of drugs and alcohol, except where sold and consumed in licensed restaurants/bars or in hotel guest rooms. The company will not tolerate the usage or abuse of controlled substances by any employee, particularly while they are on shift.

Scope

This policy applies to all employees always and without exception.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to drugs and alcohol. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

Guidelines

The employer has zero tolerance for any drug or alcohol use which affects the health and well-being of its employees, guests, visitors or threatens the physical premises of the business. The use of illegal drugs and abuse of other controlled substances, on or off duty, is inconsistent with the expectations of character that the company has for its employees. Employees who use illegal drugs or abuse other controlled substances (such as alcohol) on or off duty tend to be less productive, less reliable, and prone to greater absenteeism which results in increased operational risks.

The following are strictly prohibited, and may incur disciplinary action up to and including termination, in addition to any legal ramifications consistent with the necessary involvement of law enforcement:

- Employees shall not be under the influence of any non-prescribed drugs or alcohol while they are on company premises, operating a company vehicle, or are in the act of conducting company business regardless of location.
- The use, possession, sale, manufacture or dispensation of any illegal drug, alcohol, or paraphernalia associated with either.
- The use of alcohol or illicit narcotics off company premises that adversely affects the employees work performance, their safety, the safety of others, or the employer's reputation in the community.
- Failure to adhere to the requirements of any drug or alcohol treatment or counselling program in which the employee is enrolled.
- Failure to report to management the use of any prescribed drug which may alter the employees' ability to safely perform their duties.

4.15 Suspicion of Impairment Policy

Intent

This policy provides guidelines for the correct course of action to be taken if an employee appears to be under the influence of either drugs and/or alcohol in the workplace. It also outlines the concerns and responsibilities associated with an employee reporting to work visibly impaired and unable to perform their job duties.

Scope

This policy applies to all employees, contractors and any third parties performing work on behalf of the employer.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to this Suspicion of Impairment Policy. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

The provisions of this policy are subject to any federal, provincial or local laws that may prohibit or restrict their applicability.

Guidelines

The employer will take the appropriate actions to ensure that impaired employees are dealt with in an appropriate fashion to protect both their health and safety and that of our staff and guests.

Every employee is expected to arrive to work and remain throughout their shift, free of alcohol, drugs and any other banned or intoxicating substance. Suspicion of impairment may be based on specific personal observations pertaining to appearance, watery and/or red eyes, dilated pupils, behaviour, speech and/or breath odour of the employee. Reasonable suspicion may also relate to any involvement in a workplace accident and must be documented at or near the time of the observation.

Substances prohibited by the employer include, but are not limited to:

- Amphetamines
- Barbiturates
- Benzodiazepines
- Cocaine metabolites
- Marijuana (THC)
- Methadone
- Methaqualone
- Opiates
- Phencyclidine
- Propoxyphene
- Ethanol (Alcohol)

Should management believe that an employee is impaired, the employee is to be escorted to a private location to discuss the situation. This meeting will be held in the presence of a second member of management, and a union

representative where required and the determination that an employee is “unfit for work” is based on their best judgment and DOES NOT require a breathalyser or blood test. The employee should be advised that the company will call a taxi or shuttle service to safely transport them home. The employee should be advised that if they refuse this transportation and indicate that they will drive their personal vehicle, the company is obligated to, and will contact the police.

The employer reserves the right to inspect all property on its premises for the presence of drugs, alcohol or other contraband. The employer reserves the right to search work areas, or property that might be used to conceal drugs, alcohol, or other contraband. Employees found to be in possession of such contraband, or who refuse to cooperate in these inspections may be subject to disciplinary actions up to and including termination of employment.

The employer understands that certain individuals may develop a dependency to certain substances, which in some instances could be defined as a disease. The employer promotes early diagnoses and encourages employees to pursue medical and/or psychological treatment to manage and ultimately be cured.

Management

- Shall identify any situations that may cause concern regarding an employee’s ability to successfully and safely perform their job functions.
- When necessary, will remove from the premises any employee who is suspected to be in violation of the provisions of this policy. If the suspicion is questionable, management shall err on the side of caution and act in the best interests of the company.
- Will conduct searches, or investigations regarding suspected violations of this policy.
- When any of the above are required, will complete a formal incident report to submit to the general manager for follow up.

Employees

- Are expected to abide by the provisions of this policy.
- If an off-duty employee is requested to come in to work, it is their responsibility to refuse the request when they are under the influence of alcohol or drugs.
- Who are convicted of or plead no contest to any substance related offense must inform the employer within five days of the conviction or plea. Failure to do so will result in disciplinary action up to and including termination. In the event of an employee’s conviction or plea to charges relating to the manufacture, possession, sale, use distribution, receipt or transportation of any substance, the employer will determine whether employment will continue and/or if disciplinary action will be taken.
- Are expected to report immediately to management if they suspect a colleague to be under the influence of drugs or alcohol.

In accordance with the employee's commitment to become, and remain alcohol and drug-free, it is agreed that the employee will:

- Submit to an evaluation of potential alcohol or drug problems by a certified professional that has been referred to the employer by their benefit insurance provider as part of an Employee Assistance Program (EAP).
- Agree to attend all rehabilitation treatment recommended by the counselor performing the evaluation. The failure to satisfactorily adhere to the program for treatment will result in the termination of the employee.
- Authorize a copy of the assessment and rehabilitation recommendations be put in their personnel file.

- The employee must consent to random, unannounced follow-up substance testing for a period not exceeding twelve months.
- The employer will work to ensure that the individual can work effectively, by adjusting or providing modifications to the work, or the work environment, up to the point of undue hardship.
- Both the employee and the employer agree that by the Company assisting the employee, the Company has satisfied its obligation to accommodate the employee and that no further accommodation will be required in the event of any breach by the employee of any of the conditions.
- Acknowledges that failure to adhere to any of the above conditions will result in termination of employment with cause. Further, the employee agrees that said termination may not be contested by the employee and in turn, no monies would be owing to the employee for termination pay, severance pay and/or any entitlement to common law consideration/monies.

4.16 Slips, Trips and Falls Policy

Intent

The employer has adopted this policy to provide information for the prevention of injuries caused by slips, trips, and falls thereby ensuring a safe environment for employees and guests.

Scope

This policy applies to all employees always and without exception.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to slips, trips and falls. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

Guidelines

Employees are requested to adhere to the following workplace practices to avoid slip, trip, and fall hazards:

- Avoid the accumulation of clutter and waste.
- Ensure the proper storage of material and equipment.
- Clean up spills as soon as possible.
- Avoid placing extension cords, conduits, cables, and hoses across walking surfaces.
- Secure loose and unsecured floor mats, carpets, and coverings.
- Report damaged or missing flooring and ceiling materials to maintenance.
- Report stairs and ramps with loose or missing handrails to maintenance.
- Report areas with inadequate lighting to maintenance.
- Report slippery, wet or icy walking surfaces to management, housekeeping, or maintenance.
- Report any unsafe uneven walking surfaces to management or maintenance.
- Be aware of surface changes such as carpet to tile or level to sloped.
- Be aware of surface protrusions or depressions such as thresholds, cover plates, and gratings.
- Always wear appropriate footwear.
- Carry items in a manner that maintains clear sight-lines.
- Avoid rushing to complete work.
- Ensure adequate lighting.
- Avoid cutting through areas not designated or intended as walkways.
- Avoid horseplay and running in the workplace.
- Always pay attention to your surroundings.

Management must:

- Conduct detailed inspections of the work area on a regular basis.
- Investigate all slip, trip, and fall hazard reports.
- Investigate all incident reports involving falls.
- Provide training.

4.17 Scent-Free Workplace Policy

Intent

The employer has adopted this policy to address health concerns related to the use of scented products in the workplace.

Scope

This policy applies to all employees, always and without exception.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to a scent-free workplace. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

Guidelines

The employer prohibits the use of any scented products as they may cause adverse physical effects that threaten the ongoing comfort, health and safety of our staff, clients, guests, and the public at large. Allergic and asthmatic individuals as well as those with other conditions, report that certain odours even in the smallest amounts, can trigger an attack during which some or all the following symptoms may occur:

- Headaches
- Dizziness
- Light-headedness
- Nausea
- Fatigue
- Weakness
- Insomnia
- Malaise
- Confusion
- Loss of appetite
- Depression
- Anxiety
- Numbness
- Upper respiratory symptoms
- Shortness of breath
- Difficulty with concentration
- Skin irritation

The severity of these symptoms can vary. Some people report mild irritation while others are incapacitated and/or may have to give up many 'normal' activities to avoid exposure (such as going to public places). Employees are requested to refrain from utilizing overly scented varieties of the following products, please note this list is not exhaustive:

- Shampoo & conditioner
- Hairspray
- Deodorants
- Cologne & aftershave
- Body spray & perfume
- Lotion & cream
- Potpourri
- Industrial and household chemicals
- Soap
- Cosmetics
- Air freshener & deodorizer
- Oils
- Candles
- Some types of garbage bags

4.18 Smoke-Free Workplace Policy

Intent

Smoking has been scientifically proven to be harmful to the health of both the smoker, and non-smokers that encounter second-hand smoke. In the interest of promoting a safe and healthy work environment, a smoke-free workplace has been adopted across all properties of the brand.

Scope

This policy applies to all employees always and without exception.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to a smoke-free workplace. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

Guidelines

Smoking is permitted in designated areas only. Please refer to your employer hotel for the location of your facility's designated smoking area(s). As per provincial legislation, there is no smoking within six metres of any entrance or air intake.

Smoking is not permitted at any time while in the performance of your job function. After returning from a work break, you must wash your hands if you've had a cigarette.

1. This policy extends to company vehicles, and any hotel rooms or rental cars booked for company business purposes.
2. The employer will not discharge employees, or refuse to hire applicants because they are smokers.
3. The employer has no intention of influencing employee smoking habits outside of the workplace, and will not pursue disciplinary action for those that smoke.

4.19 Kitchen Food & Beverage Labeling Policy

Intent

As part of the Health and Safety standards within the Food Services Department the labeling of food is an important control to ensure proper rotation and shelf life of prepped products.

Scope

This policy applies to the employer and its employees, specifically those responsible for food handling and preparation. Unionized employees shall adhere to their current Collective Agreement for policies governing kitchen food labeling. Where the Collective Agreement is silent, bargaining members of the employer shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

Guidelines

Chef is to compile a list of prepared foods and apply a shelf life/expiry date to the item. This list will be posted on the fridge so culinary staff know when to discard prepared foods based on the day dot system. Chef will spot check and ensure all prepped food products are labeled and proper rotation and expiry dates are being followed.

Culinary employees will follow all proper labeling of prepared foods.

Prepared service foods

Items that are being prepared for service and kept until required such as side salads, fruit plates, cheese plates etc. must be properly labeled prior to being placed in fridges.

Prepared sauces, soups

As the kitchen will prepare different sauces and soups in bulk for future use, these items must be labeled to ensure proper rotation and expiry dates.

Prepared foods including thawing products

Items that are being or completed preparation must be properly labeled as per the standards outlined. This includes thawing products in the fridges.

End of Night closing

When closing the kitchen at the end of the day, all line items that require storage must be properly labeled and placed in the proper space such as in the fridge or placed on line coolers and service spaces.

Thawing product

When removing foods from the freezer and placing them into the fridge for thawing, all products should be labeled to ensure proper rotation and use of the thawed products.

Proper Labeling Guidelines and Procedures

Prepared foods should have a day dot identifying the day the item was prepared. The culinary team must inspect prepared items daily for quality and expiry dates referencing the posted shelf life/expiry of the item. Any items that have reached the expiry date must be discarded and tracked for Chef.

Prepared sauces and soups

Prepared sauces and soups must be properly labeled and stored in the appropriate space. The labeling will consist of date prepared and item description. Two acceptable forms of labeling will include masking tape or writing directly on the packaging/wrapping of the item.

Prepared foods including thawing products

Prepared foods include products like butter chicken or banquet items such as salads, platters etc.

Thawing product – label with masking tape placed on the item, include date removed from freezer and placed in fridge to thaw.

Prepared food – all recipes including banquet food once prepped must be labeled with date prepared, item description and function name and date.

Returned foods – includes items that have been returned to the kitchen from banquets or other locations. Food must first be inspected for quality. Products that were placed out on buffets with possible direct guest contact cannot be reused and must be discarded.

End of night closing

At the end of the day, all food items that are required to be placed back into walk-ins for example, must be labeled with item description and date of preparation and storage.

Day dot system

The use of day dots allows staff to quickly identify the day the item was prepared. Using the posted shelf life/expiry list, staff will know when the product will exceed the shelf life and be required to be discarded. The Chef must be notified of all discarded food items.

Label placement

The label should be placed on prepared food products and be visible to anyone trying to determine the shelf life/expiry date.

Shelf life/expiry dates

To determine the date of expiry of any food products, refer to the posted shelf life/expiry list. By noting the day of the day dot and the shelf life of the product, the date the product needs to be discarded can be determined by adding the number of days to the day dot.

Example:

Day Dot is: **Tuesday**

Shelf Life is: **3 days**

Expiry date to discard item is end of day: **Thursday**

4.20 Food Storage Policy

Intent

The employer has implemented this food storage policy to communicate the responsibilities and guidelines for managing food safety risks.

Scope

This policy applies to all employees always specifically, those employed in kitchen and restaurant areas.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to food Storage. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

Guidelines

Food safety is a primary concern for all food service establishments. In order to minimize cross-contamination, mitigate incidents of food-borne illnesses and to ensure employee, guest and customer health and safety, the employer has established strict food safety policies and procedures to be adhered to by all kitchen and restaurant staff as well as individuals utilizing the staff room and its refrigerators to store food for personal consumption. The adherence to proper food storage protocols is the responsibility of all employees, regardless of whether or not they are employed in the kitchen and/or restaurant areas.

The following food storage guidelines must be adhered to by all kitchen and restaurant staff. While food service area equipment and specific processes may vary from one property to another, all staff will be required to adhere to the following:

- Upon receiving shipments, all food temperatures will be checked to ensure required temperatures have been maintained during transport preventing any spoilage.
- All refrigerators and freezers will be equipped with thermometers that will be checked throughout the day to ensure appropriate food storage temperatures are consistently maintained. Thermometers will be accurate within 10c and will be checked regularly for proper functioning.
- Each kitchen will be equipped with fridge and freezer equipment that is of sufficient capacity to properly store food without overcrowding and to facilitate proper air flow within the unit.
- All food stocks will be rotated frequently to ensure the FIFO method (first in, first out) rule, is being adhered to.
- All prepared, ready to eat foods and raw vegetables in refrigerated storage will not be permitted to be stored below raw meat and fish products.
- Where food is stored in a container, the employer will ensure its kitchens utilize only food grade containers specifically intended for food storage.
- Any refrigerated and ready to eat foods, prepared and held for more than 24 hours must be marked with the date the food was prepared as well as the "consume by" date.
- All food items shall be stored separately from all non-food items.

The employer will ensure all food service area staff are properly trained and educated on the safety requirements and procedures concerning food storage. All food service area staff will ensure their Certified Food Handler Certification is current and up to date.

Employees utilizing staff kitchens to store and prepare food are required to adhere to the following:

- All perishable food must be stored appropriately either in the staff room fridge or freezer in order to mitigate incidents of rotting or spoiling that may cause offensive odours or contamination of other food.
- Employees utilizing the staff room fridge or freezer are required to clearly mark their food items with their name to avoid confusion or accidental consumption by another employee.
- Employees are required to be mindful of expiration and best before dates of any food they are storing in the staff kitchen. Staff kitchens are available to all employees, and therefore must be respected and maintained appropriately.
- Staff provided fridges and freezers are not intended for long-term storage. Employees are requested to minimize use to one day at a time to mitigate overcrowding issues.
- Please report any malfunctions of kitchen equipment to management for maintenance.

4.21 Hand Washing Policy

Intent

The employer has adopted this policy to ensure that all reasonable measures are taken to prevent the spread of bacteria and diseases within the workplace, and to ensure the ongoing health and safety of our staff, clients and guests.

Scope

This policy applies to all employees always and without exception.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to hand washing. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

Guidelines

Due to the nature of business operations and the considerable amount of public interaction that most of our employees have, proper and consistent hand washing procedures are required to maintain a healthy environment. The employer shall ensure proper hand washing procedures are posted in visible areas of its facilities.

- Hand hygiene shall be practiced on a regular basis, prior to any contact with clients and/or guests (even if gloves are worn).
- Employees must maintain clean and well-groomed fingernails.
- All employees are required to wash, rinse, and dry their hands or apply an alcohol hand rub before beginning work, after using the rest room and prior to leaving work.
- For routine hand-washing, liquid soap located in the dispensers shall be used.
- An alcohol hand rub may be used for hand hygiene in place of an antimicrobial soap hand-wash. Hands that are grossly contaminated must be washed with lotion soap prior to hand disinfection with an alcohol hand rub.
- Gloves shall be worn when exposure to blood or any other body fluids, excretions or secretions is likely.
- Kitchen and restaurant employees are required to refer to their department-specific policy concerning hand washing requirements.

Routine Hand-Washing Procedure

- Use warm water to wet the hands.
- Apply soap.
- Work up a good lather ensuring to cover all surfaces of your hands.
- Wash hands for at least 15 seconds.
- Keep hands down while rinsing so that run off will go into the sink and not down the arm.
- Dry hands well with paper towels and use the paper towels to turn off the faucet.
- Discard the paper towels into the appropriate container.

Allergies

- Allergic contact dermatitis may be associated with certain hygiene products. If an employee suspects allergic contact dermatitis, they should contact an on-site trained first-aider who will make an assessment and provide treatment where possible.
- If the rash becomes extreme, the affected employee will be advised to go to a nearby medical clinic or hospital.
- If allergic contact dermatitis is diagnosed, the employee will be provided with an alternative hand hygiene product.
- The employee's personnel file should be updated to include information on any new or changed allergies and treatment, including the use of an epi pen if necessary.

4.22 Dishwashing Policy

Intent

The intent of this policy is to communicate proper dishwashing procedures.

Scope

This policy applies to all employees without exception, specifically those employed in the hotels' food service areas.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to dishwashing. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

Guidelines

Maintaining exceptional sanitary standards for kitchen areas is of paramount importance.

The employer requires all kitchen employees to always adhere to the highest standard of cleanliness. This standard of cleanliness shall apply to the dishwashing processes and procedures utilized in food service areas. To ensure dishwashing procedures uphold sanitation requirements, the following guidelines have been implemented:

- The employer' dishwashing procedures shall consistently adhere to and exceed where possible, the minimum sanitation requirements established by applicable municipal, provincial and federal legislation.
- The employer shall utilize industry-leading dishwashing equipment to ensure the highest level of cleanliness.
- All dishwashing equipment will be inspected regularly for proper functioning.
- All dishwashing equipment will be properly maintained per manufacturer guidelines.
- Dishwashing equipment and its various pieces and components will be thoroughly cleaned daily to ensure proper functioning and to minimize food particle build-up.
- Only manufacturer-recommended cleaning solutions will be utilized. Use of such cleaning solutions will adhere to supplier guidelines pertaining to concentration, contact time and required amounts of solution per cycle/use.
- All solutions/chemicals used in association with dishwashing and sanitation of kitchen areas shall be properly marked and stored separately from all articles of food.
- Temperature checks of the dishwashing equipment will be conducted regularly to ensure heat levels required for proper sanitation are consistently maintained.
- Documentation and records will be maintained by kitchen staff concerning temperature checks, maintenance and cleaning of the equipment.
- All employees required to utilize dishwashing and related sanitation equipment will be fully trained on proper use and safe operating procedures.

4.23 Work Alone Policy

Intent

The employer will strive to ensure that all appropriate safeguards are enacted to protect our employees that must work alone or in isolation. This policy has been adopted to provide a consistent approach to these types of situations.

For the purposes of this policy, “to work alone” means working in a location or on a shift where assistance is not readily available in the event of an injury, illness or emergency.

Scope

This policy applies to all employees always and without exception.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to this Work Alone Policy. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

Guidelines

Whenever a worker is required to work alone, The employer shall:

- Conduct a hazard assessment to identify existing or potential hazards arising from the conditions and circumstances of the work.
- Take all reasonable steps to control any hazard(s) that cannot be reasonably eliminated.
- Communicate the findings of the hazard assessment in writing to all affected employees.
- Establish an effective means of communication (telephone, radio, etc.) between the employee and persons capable of responding to them.
- If an effective means of communication is not practical or available, another staff member will check in on the employee as appropriate.
- Provide employee training and education to limit the dangers of working alone.
- Investigate all accidents/incidents, and take all reasonable steps to prevent a re-occurrence.
- Report all situations, incidents or near misses where being alone increased the level of inherent danger to the situation, and make appropriate reasonable changes.

The employer will perform a thorough workplace hazard assessment for any situations where an employee is required to work alone. The workplace hazard assessment will investigate the following issues and identify practical solutions:

- Determine whether it is reasonable/safe for the employee to work alone.
- Determine the length of time the employee will be required to work alone, and establish reasonable limitations for the duration of this type of work.
- Determine the legalities of the type of work performed alone, e.g. restrictions on working in a confined space, or performing lock-out operations.
- Identify the time of day the worker will be required to work alone.
- Determine the most appropriate form of communication.

- Ensure that all emergency communication systems are in proper working order.
- Establish any physical or elemental hazards associated with the location.
- Examine the security features of the workplace (e.g. security cameras, alarms, etc.) to ensure the safety and well-being of the employee.
- Where possible, ensure the employee is in a position of high-visibility.
- Ensure that all windows are clear to provide maximum visibility.
- Determine the accessibility of the workplace to any potentially necessary emergency services.
- Ensure that the employee assigned to work alone has received the appropriate levels of training and education.
- Determine the appropriate forms of personal protective equipment required, and ensure that they are readily available, in good working order, and the employee has been properly trained in their use.
- Determine any required machinery, tools or equipment that will be necessary to perform the work.
- Establish any potential factors of fatigue that may affect the safety of the worker, and their quality of work.
- Determine whether the employee will be required to work with money or other valuables, and establish any safeguards required.
- Establish the employee's level of personal health to minimize potential health hazards associated with working alone (e.g. pre-existing medical condition that may increase their risk of becoming ill or injured while alone).

To ensure the safety of employees that must work alone, the following check-in procedure will be used:

- Management will be responsible for the preparation of a daily work plan to establish the location and duration the employee will be working alone.
- Management will ensure that a communication device for the employee to check-in with is readily available, and in a convenient location.
- Define the appropriate intervals of time for the employee working alone to check-in either visually or by using an approved communication device;
- Ensure that the schedule of visual or communication-based check-in is adhered to with a written log for documentation purposes.
- Identify an employee to act as the main point of contact for the employee working alone, as well as a backup.
- Establish a code word for use when the employee requires emergency assistance.
- Develop an emergency action plan to be followed if the employee working alone does not check-in on schedule.

The employer will take all appropriate precautions to ensure the safety of employees that are required to work alone with responsibilities for handling cash and valuables in the following manner:

- The employer will ensure that employees are in positions of high-visibility.
- Cash on hand will be reduced using a safe or drop box to deter the possibility of robbery. This policy will be advertised in a highly visible manner.

- Employees that are required to handle cash while working alone will be provided with training in robbery awareness and prevention to ensure that they take the appropriate steps to avoid a robbery, and/or act appropriately in the event of a robbery.
- Employees are required to cooperate in the event of any robbery, and immediately surrender to the demands of the robber by supplying them with any available cash or merchandise. Employees are far more valuable than any amount of cash or merchandise.
- Employees should contact the police, appropriate emergency services, and management when it is safe to do so.
- Security systems will be maintained to deter the possibility of any potential robbery.
- Wherever reasonably practical, the employer will avoid requiring employees to perform hazardous work alone, and will schedule this type of work to be completed during normal work hours, in the presence of other employees.
- Where it is necessary to perform hazardous work alone, employees will be required to utilize the check-in procedure, and communication devices provided to ensure that the employee is capable of checking-in at appropriate intervals.
- Training and education will be provided to ensure that the employee is knowledgeable in safe work practices, use of personal protective equipment, use of all required machinery and tools, as well as hazard identification and hazard avoidance.
- Personal protective equipment, required tools/machinery and first-aid materials will be supplied.
- Employees that are required to travel alone shall utilize the check-in procedures to ensure their ongoing communication with the company.
- A travel plan will be created for each instance of employee travel that provides details pertaining to the proposed destination, estimated time of arrival, return time and/or date, hotel accommodation, contact information, mode of travel, and alternate plans in the event of bad weather, traffic problems, etc.
- Training and education to ensure that employees travelling alone can evaluate and avoid potential risks/hazards will be provided.

4.24 Right to Refuse Unsafe Work/Stop Work Policy

Intent

This policy has been adopted to provide appropriate guidelines for any potential work refusal/stoppage in accordance with provincially-specific legislation. The employer endeavours to meet or exceed all workplace health and safety requirements under provincial Occupational Health and Safety Acts.

In accordance with Section 43 of Ontario's *Occupational Health and Safety Act*, Section 35 of Alberta's *Occupational Health and Safety Act* and Section 3.12 of British Columbia's *Occupational Health and Safety Act* in the event that an employee encounters unsafe working conditions, or where the required equipment, tools or machinery present a serious health and safety concern, the employee shall have the right to refuse any work that they believe to be unsafe.

Scope

This policy applies to all employees always and without exception.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to the right to refuse unsafe work/stop work policy. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

This policy has been developed to incorporate the legislative requirements of Alberta, British Columbia and Ontario and shall be updated accordingly should the employer expand its operations into additional provinces.

Guidelines

Any employee can refuse to work if they have a reasonable belief that one or more of the following situations exist:

British Columbia

- The employee has reasonable cause to believe that carrying out a work process or operation of any tool, appliance or equipment would create an undue hazard to the health and safety of their person.

Alberta

- The employee believes that there exists an imminent danger to themselves or another employee's health and/or safety;
- The employee believes on reasonable and probable grounds that operation of a tool, appliance or piece of equipment will cause to exist an imminent danger to the health or safety of that employee or another employee present at the work site.

Ontario

- Machinery, equipment or tools required in the performance of job duties are believed to present a safety hazard and their use may cause an injury to the employee or those nearby.
- The working conditions are unsafe or are in violation of the provincial health and safety legislation, and may cause an injury to the employee or those nearby.
- The employee has a reasonable expectation that the work would place them in danger of physical violence.
- In the event work is refused or stopped, the following actions are required of employers and employees, per provincial guidelines:

Employees

1. Inform management of the work refusal immediately, providing an explanation detailing the rationale behind the work refusal as well as details pertaining to the unsafe condition.
2. Stay nearby in a safe place until an investigation has been completed.
3. If you are unsatisfied with the results of the investigation, you may continue to refuse the work provided you have reasonable grounds to base the continued refusal on.

Management

1. Management shall investigate the situation immediately after learning of the work refusal and will find an effective, safe and mutually agreeable resolution to the issue in the presence of the employee and one of the following:
 - Joint Health and Safety Committee member
 - Another employee that has been chosen by his peers (or union) to represent the employees.
2. Where management believes, the report is not valid they must inform the person who made the report.
3. A written record of the notification, investigation and actions taken to remedy the situation will be created with copies to go to the individual(s) refusing the work, the employer and the Joint Health and Safety Committee and union representative where applicable.
4. If an employee is unsatisfied with the resolution and continues to refuse the work, management must contact one of the following based upon the employee's province of employment:
 - a) Ontario: A Ministry of Labour (MOL) inspector
 - b) Alberta: A government Occupational Health and Safety Officer.
 - c) British Columbia: Workers' Compensation Board.
5. While awaiting the arrival and findings of the government and/or inspector/officer, management may assign other reasonable work to the employee(s) who has/have refused work.
6. Management may ask another employee to perform the refused work while waiting for the inspector to investigate.
7. Where a second employee is asked to perform work that has been refused the second employee must be informed of the initial work refusal and the reasons for the refusal. This information must be provided in the presence of a union representative (where applicable), or a health and safety representative. The second employee also has the right to refuse work.
8. In Alberta and Ontario, the inspector will investigate with the employer, the employee and a representative of the Joint Health and Safety Committee to determine if the work is either safe or unsafe and presents a danger to the health and safety of the employee.
9. The findings of the investigation must be provided in writing to the employee, management, and the Joint Health and Safety Committee representative. If the work is determined to be safe, the employee shall be expected to return to work.
10. Employees in Alberta who are not satisfied with the inspector's report may appeal the report within 30 days to request a review by the Occupational Health and Safety Council.

Compensation

- Employees who refuse work and are given alternate work until a resolution is found will be paid at a wage no less than their regular rate of pay.
- A person acting as a worker representative during a work refusal is paid at either the regular or the premium rate, whichever is applicable.
- The employer is not required to continue payment if the refused work has received a final ruling that the work is safe by a government official and/or agency.

The employer shall not penalize, dismiss, discipline, suspend or threaten to do any of these things to an employee who has obeyed the law, and regulations of the OHS/A of their respective province. Employees will not be disciplined for refusing to work if they have a reasonable belief that the work is unsafe or could endanger themselves or others. If a work refusal was made in bad faith, or if the employee continues to refuse the work after a final decision that the work does not pose a threat, the employer may elect to utilize disciplinary action(s) up to and including termination of employment with cause.

4.25 Emergency Response Policy

Intent

The Emergency Response Policy has been created to address, in a coordinated and systematic manner, all types of emergencies potentially affecting the employer. Each property has a specific plan for responding to major emergencies. Roles and responsibilities are assigned for the implementation and execution of a plan in the event of an emergency or catastrophe affecting one of the employer's properties, facilities and/or employees. Employees should refer to their hotel specific emergency response plan.

Scope

This policy applies to all employees in the event of an emergency and/or disaster always and without exception.

Unionized employees are requested to refer to their current Collective Agreement for specific information pertaining to emergency responses. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

The employer's umbrella of operations is located across multiple provinces and various geographic regions subject to varying degrees of likelihood of natural disasters, the employer shall ensure that each of its locations develop and implement an Emergency Response Plan specific to their location.

Guidelines

The employer is committed to supporting the welfare of its employees, guests, visitors and physical premises. This Emergency Response Policy is in place to ensure human safety, minimize damage to property and to assure rapid and responsive communication to all parties involved.

Due to the nature of the services that the employer provides to its guests and the inherent responsibility of keeping our employees and guests safe, it is imperative that employees report an emergency immediately to management.

The employer requires that each hotel location maintain an emergency response/assessment plan to ensure that emergency situations are responded to in a fully coordinated approach, thus ensuring greater effectiveness, efficiency and streamlined communication. *All parties should refer to the specific plan of their hotel for guidelines.*

For the purposes of this policy, the employer defines "emergency" as an instance, or combination of instances, of unsafe conditions that pose a threat to people or property. They are as follows:

1. Fire and/or smoke. Any fire of combustible materials causing danger of burns from the fire or suffocation/choking from smoke inhalation. This can also include nearby fires where there is a clear danger of the fire spreading to the employer' property or causing the air to become unbreathable due to smoke.
2. Natural disaster or severe weather. This is a broad term meaning any emergency caused by inclement weather conditions or tectonic activity. Natural disasters include tornados, floods, earthquakes, mudslides, hurricanes, lightning strikes, avalanches, blizzards, ice storms, severe thunderstorms, and so on. In some cases, natural disaster may also include excessive periods of intensely cold weather, or excessive periods of intensely hot and/or humid weather.
3. Chemical, biological, or radiological incidents. This may include a release of toxic chemicals or other dangerous agents within the vicinity of the employer, including natural gas leaks; the release of harmful bacteria, viruses, or other biological dangers; release of or exposure to radioactive materials.

4. Structural failures. This term encompasses any damage to property or premises that causes unsafe conditions due to structural failure. Failures or pending failures include, but are not limited to, bomb threats, collapsed walls, ceilings, or foundations, burst water mains, electrical power outages, and so on.

All properties are required to conduct hazard assessments of their premises to ensure all potential hazards in relation to emergencies are properly addressed and incorporated into their Emergency Response Plans. These plans will be reviewed at least annually or as required considering an emergency or change to the physical layout of the hotel.