

RESPONSIBILITIES











TABLE OF CONTENTS

ACI	knowleagemenis	··· Z
Ke	y Messages	3
Se	ctions	
1	Introduction	5
2	What are the Laws for Occupational Health and Safety?	9
3	Identifying and Controlling Hazards	19
4	Worker Competency and Training	33
5	Reporting and Investigating Incidents and/or Injuries	39
6	First Aid	·· 43
7	Emergency Response	47
8	Preventing Workplace Violence	
9	Working Alone	55
10	Physician Obligations Regarding Patient/Client Workers under the OHS Legislation	·· 59
•	opendices Glossary of Terms	40
A B	Resources	72
C	Occupational Health and Safety Code	
D	Sample Hazard Assessment Form	
E	Sample Worker Orientation Record	
F	Sample Record of Training	
G	Sample Incident Reporting and Investigation Form	
Н	Sample First Aid Record Form	
1	Sample Emergency Response Plan	
J	Sample Workplace Violence	. 71
-5	Prevention Policy and Procedures	··· 93
Fee	edback Form	95

Acknowledgements

This document, A Physician's Guide to Occupational Health and Safety Responsibilities has been developed through consultation with the College of Physicians and Surgeons of Alberta (CPSA) and the Alberta Government – Employment and Immigration (E&I), Workplace Innovation and Continuous Improvement: Work Safe Alberta. We acknowledge the valuable contributions of the people who participated on the working group.

It is also available on the website at: www.worksafely.org or by link from the CPSA website at: http://www.cpsa.ab.ca/home/home.asp

Key Messages

This document, A Physician's Guide to Occupational Health and Safety Responsibilities, has been developed to assist physicians and their staff, as employers and as workers, to understand and maintain compliance with the Alberta Occupational Health and Safety (OHS) Act, Regulation and Code to ensure the health and safety of themselves, their co-workers and their employees. The focus is on the prevention of work-related illnesses and injuries of workers.

SECTION 1: INTRODUCTION

In Alberta workers are protected by the Occupational Health and Safety (OHS) Legislation

Employers are responsible for ensuring the health and safety of all workers at their work site.

Workers are responsible for ensuring the health and safety of themselves and other workers while conducting their work at the work site.



Employers must:

- identify workplace hazards and conduct a written hazard assessment
- eliminate or control the identified hazards
- inform workers of existing or potential hazards and methods of control



SECTION 3: IDENTIFYING & CONTROLLING HAZARDS

Employers must ensure that workers:

- are competent to work in a safe and healthy manner
- are trained in operation of equipment and tools
- are trained in procedures for working with harmful substances
- are trained in use of PPE

Workers must:

- take part in and apply training
- not perform work they are not competent to perform

F

SECTION 4: WORKER COMPETENCY & TRAINING

Employers must:

- report serious incidents and fatalities to the Government of Alberta (GOA) workplace health and safety
- investigate incidents that cause injury or have the potential to cause a serious injury.



SECTION 5: REPORTING & INVESTIGATING INCIDENTS/INJURIES

.):

Employers must:



- provide first aid services, supplies and equipment that meet the requirements outlined in the *OHS Code*, Part 11.
 - maintain first aid records for 3 years

SECTION 6: FIRST AID

SECTION 7: EMERGENCY • have a written e



- have a written emergency response plan that includes all the elements outlined in the *OHS Code* Part 7
- communicate this plan to all workers

SECTION 8: PREVENTING WORKPLACE VIOLENCE

RESPONSE

Employers must:



 consider workplace violence when conducting their hazard assessment and implement appropriate controls to protect workers

SECTION 9: WORKING ALONE

Employers must:



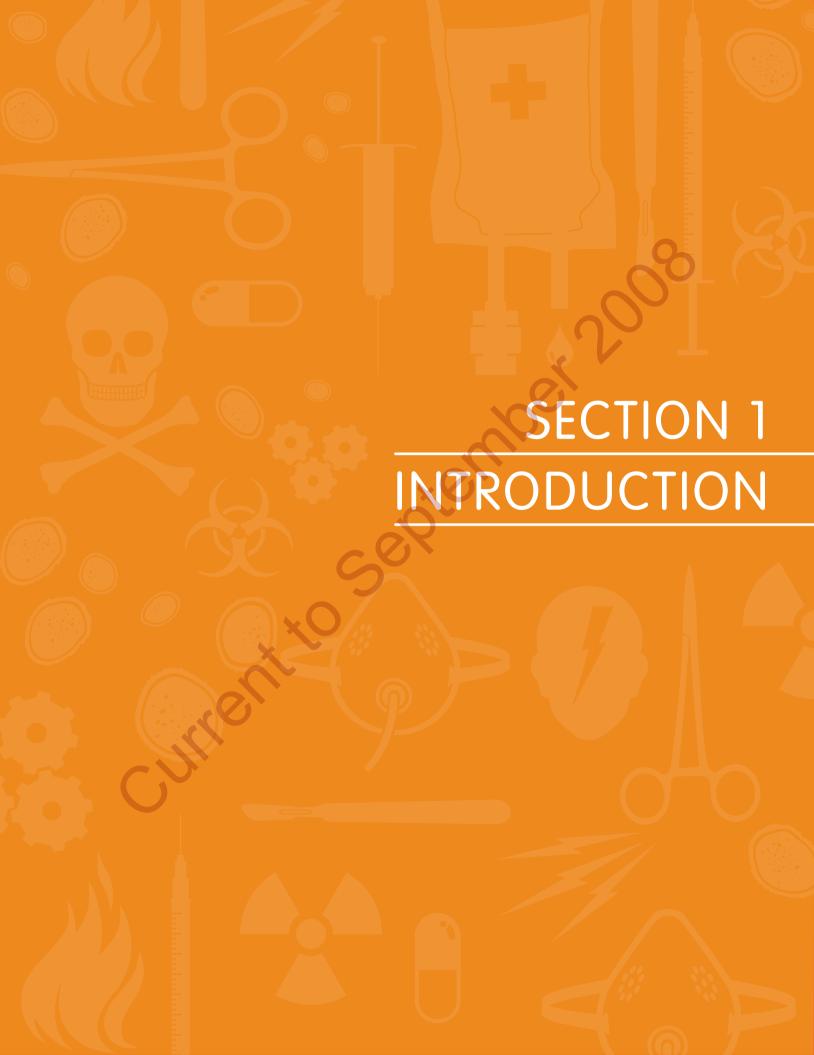
 ensure workers who are working alone have a means of communication to obtain assistance if required

SECTION 10:
PHYSICIAN
OBLIGATIONS
REGARDING
PATIENT/CLIENT
WORKERS UNDER
THE OHS
LEGISLATION

Physicians in Alberta have specific obligations under the Occupational Health and Safety legislation to:



- report notifiable diseases to the Government of Alberta, Workplace Health and Safety, Director of Medical Services
- furnish reports on workers who have work-related illnesses or injuries when requested by the the Government of Alberta, Workplace Health and Safety, Director of Medical Services





About this Document

This document, A Physician's Guide to Occupational Health and Safety Responsibilities, has been developed to assist physicians and their staff, as employers and as workers, to understand and maintain compliance with the Alberta Occupational Health and Safety (OHS) Act, Regulation and Code to ensure the health and safety of themselves, their co-workers and their employees. The focus is on the prevention of work-related illnesses and injuries of workers.

SECTION 1: INTRODUCTION

The document has been developed for use by all physicians in Alberta in all work settings such as, but not limited to:

Physicians in community practice including:

- · Private offices
- · Medical clinics
- · After hours and walk-in clinics

College accredited diagnostic and treatment facilities:

- Non-hospital surgical
- · Diagnostic imaging
- · Medical laboratories
- · Pulmonary function laboratories
- · Clinical neurophysiology
- · Cardiac exercise stress testing

Physicians as workers and directors of work in all work settings such as:

- · Acute care hospitals
- · Long term care facilities
- · Primary care networks
- · Other institutions

This document is meant to be read in its entirety to provide information on the legislated roles and responsibilities for workplace health and safety in Alberta. The laws for health and safety are **minimum requirements**. Some best practices¹, tools, forms and a list of resources are provided to assist physicians in meeting or exceeding the minimum requirements.

For clarity, the legislated requirements (laws) are specifically identified in yellow highlighted text boxes.

Not all requirements under the *OHS Act, Regulations and Code* are discussed in this resource. **This is not a definitive guide to the legislation and does not exempt readers from their responsibilities under applicable legislation.** In case of inconsistency between this resource and the occupational health and safety legislation or any other legislation, the legislation will always prevail.



^{1.} See definition under Glossary of Terms

For more detailed information, refer to the *OHS Act, Regulation or Code*, and to the employers' safe work procedures. Employers' safe work practices and site-specific requirements may exceed the minimum requirements of the OHS Legislation.

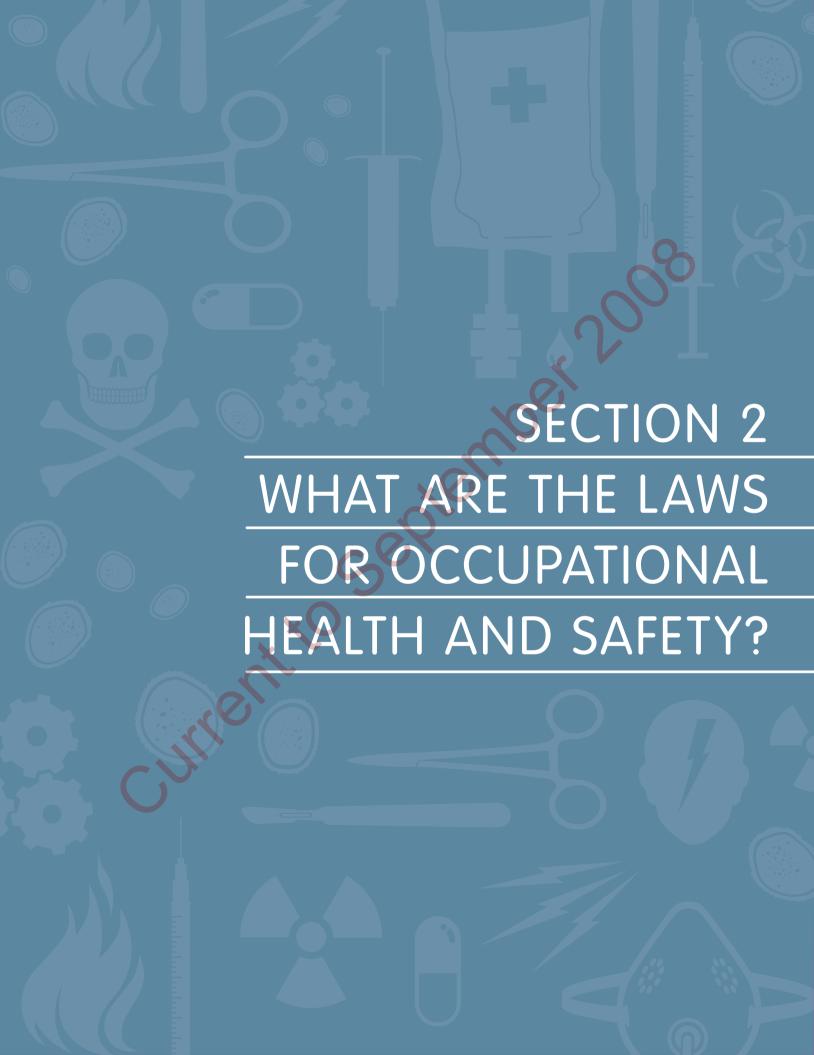
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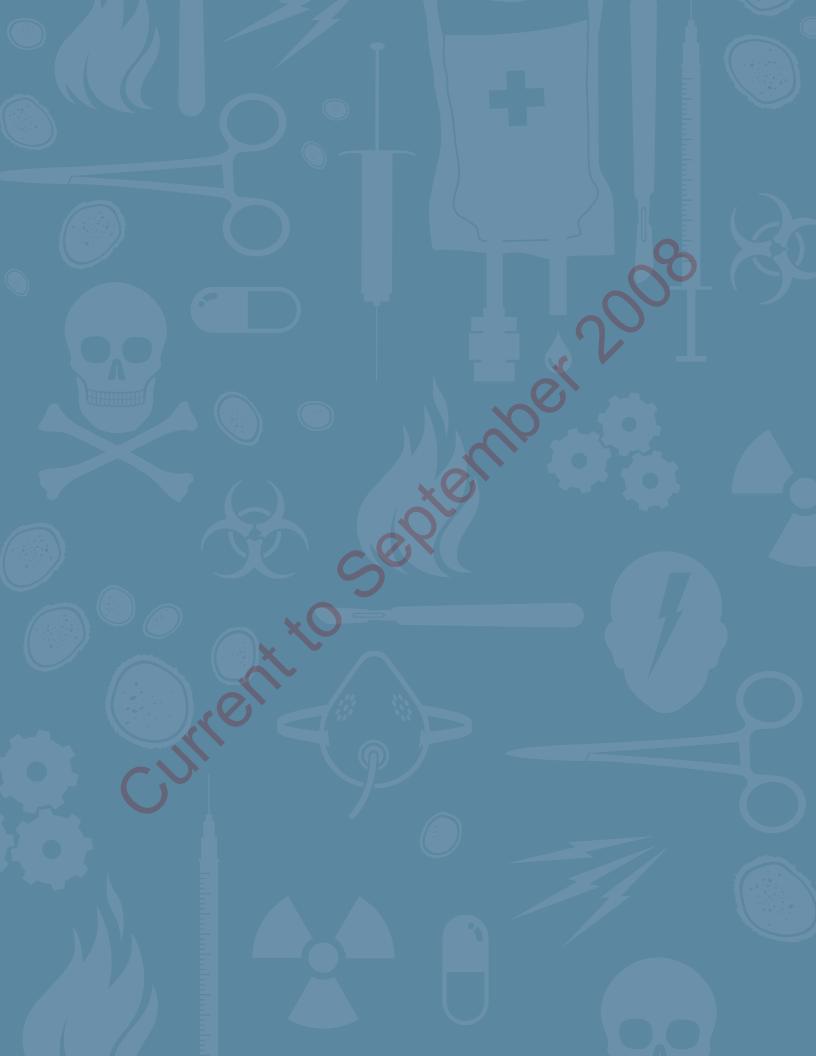
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In Alberta workers are protected by the Occupational Health and Safety Legislation



Employers are responsible for ensuring the health and safety of all workers at their work site.

Workers are responsible for ensuring the health and safety of themselves and other workers while conducting their work at the work site. KEY MESSAGES SECTION 2

Alberta's Occupational Health and Safety (OHS) Legislation are laws that help protect the health and safety of workers at work.

Alberta's OHS legislation has three (3) parts:

- 1. Occupational Health and Safety (OHS) Act
- 2. Occupational Health and Safety (OHS) Regulation
- 3. Occupational Health and Safety (OHS) Code

The OHS Act:

- Sets minimum standards to protect and promote the health and safety of workers throughout Alberta.
- · Defines the obligations of employers and workers.
- Establishes the authority and powers of government officials to enforce the law.
- · Specifies maximum penalties
- Establishes broad rules of procedure in the case of a workplace incident.
- Creates the authority of the *Regulation and Code*.

The OHS Regulation:

- Establishes broad provisions (rules) that apply to all Alberta workplaces. These provisions reflect government policies and are the minimum requirement to ensure the protection of Alberta workers.
- · Contains specified administrative processes.

The OHS Code:

- Contains detailed technical requirements for creating safe and healthy
 workplaces. In some cases, the provisions specify an "objective" requirement
 —which allows the use of options. In other cases, the provisions specify
 precisely what is required—these provisions must be met in order to remain
 in compliance.
- Contains references to recognized technical Standards (such as Canadian Standards Association CSA).

Where Do I Find the Legislation?

The Occupational Health and Safety legislation is available on the Government of Alberta – Alberta Employment and Immigration (AEI) website at: http://employment.alberta.ca/cps/rde/xchg/hre/hs.xsl/307.html

Explanation guides to assist in interpretation of the legislation are available at: http://employment.alberta.ca/cps/rde/xchg/hre/hs.xsl/3969.html

Official printed copies may be purchased from the Queen's Printer at: http://www.qp.gov.ab.ca/documents/acts/O02.cfm

or:

Edmonton Bookstore Main Floor, Park Plaza 10611- 98 Avenue Edmonton, Alberta T5K 2P7

Phone: (780) 427-4952 Fax: (780) 452-0668

Who is covered under the Alberta OHS Legislation?

The OHS Act, Regulation and Code affect most workers and employers in Alberta including the healthcare industry and physicians.

The major exceptions are:

- Farmers and ranchers
- Domestic workers (such as nannies, housekeepers) and persons working at home
- Workers in federally regulated industries (for example, banks, transportation companies crossing provincial borders, television and radio broadcasters)

Reference: OHS Act, Section 1(s)



General Obligations of Employers

Who is an employer?

Under the Alberta Occupational Health and Safety Act:

An employer means:

- A person who is self-employed in an occupation
- A person who employs one or more workers
- A person designated by an employer as the employer's representative, or
- A director or officer of a corporation who oversees the occupational health and safety of the worker employed by the corporation

Reference: OHS Act, Section 2 (1)





Application to Physicians

Physicians must consider their occupational health and safety responsibilities as both employers—where they are the actual employer of staff (i.e. their private practice office or clinic) and as workers. For example, physicians who work in a hospital setting where they are not specifically the employer of workers, have responsibilities as workers to ensure the health and safety of themselves and other workers while engaged in their occupation.

Employer Responsibilities

Under the *OHS Act*, Section 2 (1), employers are responsible for ensuring the health and safety of all workers at the work site. Specific requirements are outlined throughout the *OHS Act*, *Regulation and Code* depending on the work that is to be done.



- Identifying hazards, conducting a written hazard assessment and implementing controls
- Informing workers of any hazards on the job site
- Ensuring that workers are aware of their responsibilities and duties under the OHS Act
- Ensuring that all equipment used at a worksite is properly maintained and safe for use
- Ensuing that workers completing work are either competent to do so, or under the direct supervision of a worker who is competent
- Ensuring that workers are adequately trained in the safe operation of equipment, including safety equipment
- Ensuring that workers are adequately trained in the use of safe operating procedures, including any procedures designed to minimize the workers exposure to a harmful substance
- Properly labelling, storage and disposal of dangerous chemicals
- Ensuring workers perform their duties as required by the OHS Legislation
- Monitoring workers who may be exposed to certain hazards such as chemicals or noise, in some cases specific health examinations may be required
- Establishing policies and procedures dealing with storing, handling, using and disposal of biohazardous materials

Reference: OHS Regulation, Sections 12, 13, 15; OHS Code, Part 35

REQUIREMENTS

Some specific requirements are addressed throughout this document, but employers must refer to the *Alberta Occupational Health and Safety Act, Regulation and Code* (See list Appendix C) to determine the requirements specific to their work and work sites.



For information on the meaning of "due diligence" and "reasonably practicable" please refer to the Workplace Health and Safety Due Diligence bulletin available at: http://employment.alberta.ca/documents/WHS/WHS-PUB_li015.pdf

Worker Responsibilities

Workers have responsibilities under the OHS legislation as well. These are outlined throughout the *OHS Act, Regulation and Code* and include, but are not limited to the following:

Workers must:

- take reasonable care to protect the health and safety of themselves and other workers while performing their duties
- not perform work they are not competent to do unless they are under the supervision of a competent worker
- immediately report to their employer any equipment that is unsafe or not functioning properly
- follow health and safety work procedures developed by their employer
- participate in and apply training provided by the employer regarding safe operations of equipment or harmful substances they may be exposed to
- · wear personal protective equipment required by their employer
- refuse to do work that may put them or another worker in "imminent danger"

Reference: OHS Act, Sections 2(2), 35. OHS Regulation Sections 14, 15

LEGISLATED REQUIREMENTS

Other Specific Requirements

Imminent Danger

Section 35 of the OHS Act outlines both the employers and workers responsibilities in regard to the workers responsibility to refuse work where there exists an imminent danger.

No worker shall:

- carry out any work, if on reasonable and probable grounds, the worker believes that there exists an imminent danger to the health or safety of that worker
- carry out any work if, on reasonable and probable grounds, the worker believes that it will cause to exist an imminent danger to the health or safety of that worker or another worker present at the work site, or
- operate any tool, equipment if, on reasonable and probable grounds, the worker believes that it will cause to exist an imminent danger to the health or safety of that worker or another worker present at the work site

Imminent danger means "a danger that is not normal for that occupation, or a danger under which a person engaged in that occupation would not normally carry out the person's work"

A worker who refuses to carry out work or operate a tool, appliance or equipment shall, as soon as practicable, notify the worker's employer at the work site of the worker's refusal and the reason for refusal

Reference: OHS Act, Section 35 (1), (2), (3)

On being notified of refusal to work under imminent danger, the **employer** shall

- investigate and take action to eliminate the imminent danger
- ensure that no worker is assigned to use or operate the tool, appliance or equipment or perform the work for which a worker has made notification of refusal to work unless
- the worker to be assigned is not exposed to imminent danger or
- the imminent danger has been eliminated
- prepare a written record of the worker's notification, the investigation and action taken
- give the worker who gave the notification a copy of the record

Reference: OHS Regulation, Sections 12, 13, 15; OHS Code, Part 35

Example

An example of an imminent danger situation would be a healthcare worker being asked to continue carrying out work in a facility with a known gas leak resulting in a methane concentration of more than 1% (20% of the lower explosive limit). As the healthcare worker is not competent or properly equipped to handle fire and explosion emergencies, the worker must refuse to carry out any work and notify the employer immediately.



LEGISLATED REQUIREMENTS

LEGISLATED REQUIREMENTS

For further information on how to find information in the *OHS Act*, *Regulation and Code* access the Workplace Health and Safety eLearning program on the legislation at:

http://employment.alberta.ca/whs/learning/Legislation/Legislation.htm

Publications and bulletins are available on a variety of health and safety topics at: www.worksafely.org

Role of the Government of Alberta Occupational Health and Safety (OHS) Officers

Occupational Health and Safety Officers are employees of the Government of Alberta. The role of the Occupational Health and Safety Officer is to ensure that employers meet minimum legislated standards to provide healthy and safe worksites as outlined in the *OHS Act, Regulation and Code*. Officers may conduct inspections of worksites. Officers also investigate serious incidents and worker fatalities.

Officers may enter any work site at any reasonable hour, interview persons at the work site, require the production of records, or take samples or photographs at the work site.

Officers may write orders, stop work or stop the use of equipment if there are unsafe or unhealthy conditions at that site. For more details on the roles of Officers refer to the *OHS Act*, Section 9.

To file a complaint or report a serious incident call the Workplace Health & Safety (WHS) Contact Centre toll-free at 1-866-415-8690, 24 hours a day, seven days a week or go to the website at: http://employment.alberta.ca/cps/rde/xchg/hre/hs.xsl/2874.html

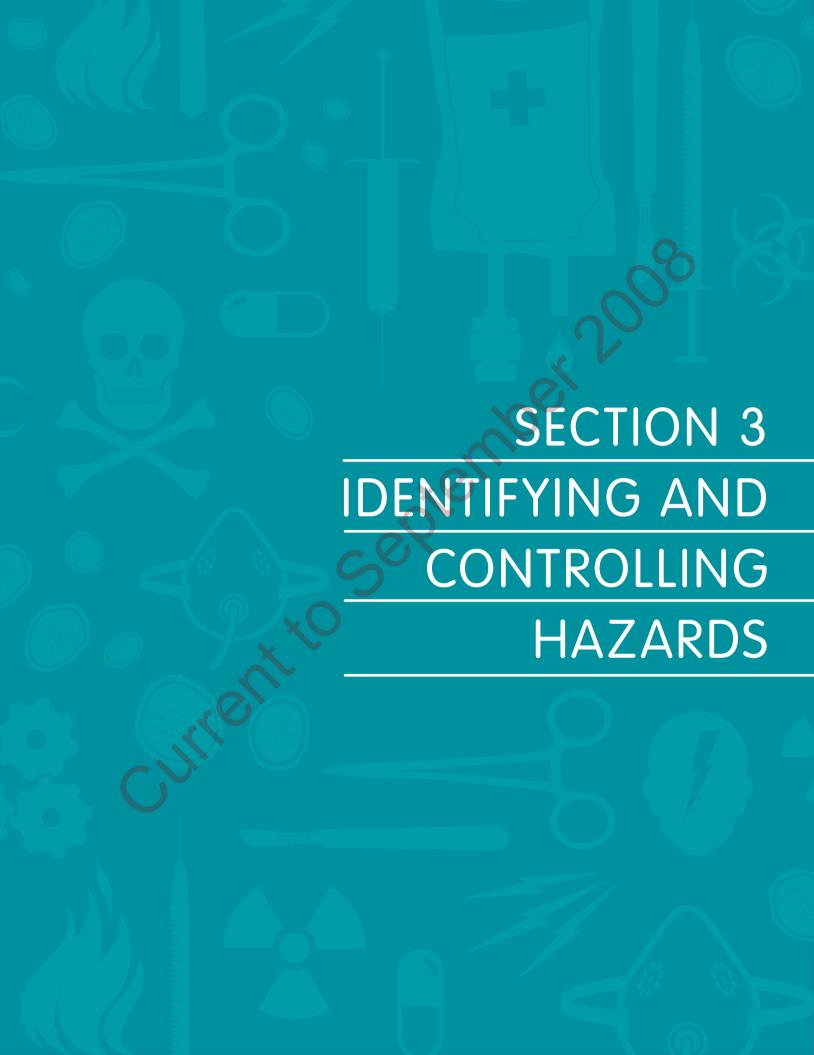


Resources for OHS Legislation:

- e-learning program on the Legislation at:
 http://employment.alberta.ca/whs/learning/Legislation/Legislation.htm
- OHS Act: http://www.qp.gov.ab.ca/documents/acts/002.cfm
- OHS Regulation: www.qp.gov.ab.ca/documents/Regs/2003_062.cfm?frm_isbn=077971752X
- OHS Code: http://employment.alberta.ca/documents/WHS/WHS-LEG_ohsc_2006.pdf
- OHS Code Explanation Guide: http://employment.alberta.ca/cps/rde/xchg/hre/hs.xsl/3969.html
- Due Diligence:
 http://employment.alberta.ca/documents/WHS/WHS-PUB_li015.pdf
- Employer's Guide: Occupational Health and Safety Act: http://employment.alberta.ca/documents/WHS-PUB_li009.pdf
- Employer's Guide: Occupational Health and Safety Act: http://employment.alberta.ca/documents/WHS-PUB_li009.pdf
- Worker's Guide: Occupational Health and Safety Act:
 http://employment.alberta.ca/documents/WHS-PUB_li008.pdf

RESOURCES

Surrent to September 2008





Employers must:

- identify workplace hazards and conduct a written hazard assessment
- eliminate or control the identified hazards
- inform workers of existing or potential hazards and methods of control



KEY MESSAGES SECTION 3

Legislated Requirements

Hazard identification, assessment, and control is at the foundation of occupational health and safety, and is a requirement under the Alberta *Occupational Health* and *Safety Code*.

Employer responsibilities

Before work begins at a new work site:

Employers must:

- · Assess a work site and identify existing and potential hazards
- Prepare a written and dated hazard assessment, including the methods used to control or eliminate the hazards identified.
- Where possible, involve workers in the hazard assessment
- Make sure workers are informed of the hazards and the methods used to control the hazards

REQUIREMENTS

Reference: OHS Code, Part 2

Hazard assessment is not a one time thing. The laws require that:

An employer must make sure that a hazard assessment is done:



- At reasonably practicable intervals to prevent the development of unsafe and unhealthy working conditions
- · When a new work process is introduced
- When a work process or operation changes
- Before the construction of a new work site

LEGISLATED

REQUIREMENTS

Identifying and Assessing Hazards

What is a Hazard?

A hazard is any situation, condition or thing that may be dangerous to the safety or health of workers.



LEGISLATED REQUIREMENTS

Reference: OHS Code, Part 2

Reference: OHS Code, Part 2

Hazards may be grouped into four main categories:

Hazards may be grouped into	o four main categories.
Physical Hazards	Lifting and handling loads e.g. manual materials handling Repetitive motions Slipping and tripping hazards e.g. poorly maintained floors Equipment Fire Electricity e.g. poor wiring, frayed cords Excess noise Inadequate lighting Extreme temperatures Vibration Ionizing radiation Workplace violence Lasers Saws Cautery equipment Sharps
Chemical Hazards	Chemicals e.g. solvents, cleaners, medications such as antineoplastics, cytotoxics Sterilizing agents such as glutaraldehyde Bleach Dusts e.g. from procedures such as bone dust Smoke Fumes e.g. laser, cautery Mists and vapours Gases such as anaesthetic gases, oxygen Liquid nitrogen Formaldehyde Mercury – from broken thermometers or sphygmomanometers Hydrogen Peroxide Latex
Biological Hazards	 Viruses, fungi, bacteria e.g. influenza, varicella, rubeola Moulds Blood and body fluids – Hepatitis B and C; HIV Sewage Anthrax – bioterrorism Respiratory airborne pathogens
Psychosocial Hazards	Working conditions Stress Fatigue Shift work Working alone Workplace violence Working with chronically ill and dying patients (stress)

How to Conduct a Hazard Assessment...

There are a number of ways to find hazards in the workplace including:

- Walk around and look at your workplace and at how work is done.
 Ask your workers what they consider unsafe.
- Think about what could possibly go wrong and don't overlook the things that people may have 'worked around' for years. Ask yourself "what if....?"
- Review any information you may have on a particular piece of equipment (manufacturer's specifications) or chemical (Material Safety Data Sheets (MSDS)) to see what it says about work practices, conditions of use and safety precautions.

Questions to Ask When Looking for Hazards

- What is your working environment ie: office, clinic, laboratory?
- How suitable are the things you use for the task?
 Are they easily accessible?
- How might people be hurt directly by equipment, machinery and tools?
- How might people be hurt indirectly through noise, fumes, radiation etc?
- How might people be hurt by using chemicals and/or other materials (solvents, cleaning agents, lasers, gases, biological samples, wastes)?
- Are workers using equipment and materials correctly?
- Are workers at risk of exposure to violence?

For further information on Hazard Assessment and Control access our eLearning Program at:

http://employment.alberta.ca/whs/learning/hazard/Hazard.htm

Eliminating and Controlling Hazards

The employer is responsible for identifying, eliminating or controlling all hazards at their work sites.

Whenever possible, hazards should be **eliminated**. If this is not possible they must be controlled. **Control** means reducing the hazard to levels that do not present a risk to worker health. The preferred hierarchy of controls is outlined in the *OHS Code*, Part 2, Section 9. Controls, in order of preference are:

QUESTIONS TO ASK

1st Choice	Engineering controls (Preferred method)	 First try to eliminate the hazard completely. This could mean removing trip hazards on the floor or disposing of unwanted chemicals, outdated equipment etc. If it is not practical to eliminate the hazard completely, try to substitute it with something safer, such as using a less toxic chemical, ordering supplies in smaller packages for easier lifting etc Isolate the hazard: for example, use sound proof barriers to reduce noise levels, shield from radiation; use remote control systems to operate equipment Use mechanical lifts to move heavy loads Ventilation – ensure general ventilation air exchanges are appropriate to work activity and local exhaust ventilation is in place where needed
2nd Choice	Administrative controls	 Use safe work procedures Provide training and supervision for workers Ensure regular maintenance of machinery and equipment Limit exposure times by using job rotation Staff immunization programs
3rd Choice	Personal Protective Equipment (PPE)	 Includes gloves, hearing and eye protection, protective clothing, respirators, proper footwear, face shields etc. Ensure that The right type of PPE is selected for the job PPE fits properly and is comfortable under working conditions Workers are trained in the need for PPE, its use, proper donning and doffing, limitations and maintenance PPE is stored in a clean and fully operational condition Workers are fit tested for use of respiratory protective equipment (RPE) where it is required based on the hazard assessment
Cy.	Combination of the above	EngineeringAdministrativePPE

Worker Responsibilities

LEGISLATED REQUIREMENTS

Workers must use the equipment provided for lifting, lowering, pushing, pulling, carrying, handling, or transporting heavy or awkward loads



Reference: OHS Code, Part 14: Lifting and Handling Loads

Legislation Applicable to Chemical Hazards, Biological Hazards and Harmful Substances

Legislation related to chemical and biological hazards and harmful substances is found in several sections of the OHS legislation. Part 4 of the *OHS Code* outlines some specific requirements related to worker exposures and monitoring.

LEGISLATED REQUIREMENTS

Harmful substance means a substance that, because of its properties, application, or presence, creates or could create a danger, including a chemical or biological hazard, to the health and safety of a worker exposed to it.



Reference: OHS Code, Part 1, H

Schedule 1, Table 2 of the *OHS Code* lists the Occupational Exposure Limits (OEL's) for chemical substances in Alberta. Employers must be in compliance with these exposure limits for the chemicals used at their work sites.

Legislation Applicable to Biological Hazards

Legislation related to biological hazards may be found in several sections of the OHS legislation, including, but not limited to, Part 4 and Part 35 of the *OHS Code*.

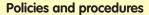
OHS Code, Part 35: Health Care and Industries with Biological Hazards

Employer Responsibilities

Sharps containers

An employer must:

- provide sharps containers and ensure that they are located as close as reasonably practicable to where sharps are used
- ensure that a sharps container has a clearly defined fill line and is sturdy enough to resist puncture under normal conditions of use and handling



An employer must:

- establish policies and procedures dealing with storing, handling, using and disposing of biohazardous material
- ensure that workers are informed of the health hazards associated with exposure to the biohazardous material
- ensure that worker exposure to biohazardous materials is kept as low as reasonably practicable

Limited exposure

 An employer must ensure that worker exposure to biohazardous materials is kept as low as reasonably practicable

Post-exposure management

 An employer must establish policies and procedures for the post-exposure management of workers exposed to biohazardous material

Reference: OHS Code, Part 35: Health Care and Industries with Biological Hazards

Worker Responsibilities

Sharps containers

A worker must use the sharps container provided

Recapping needles

A person must not recap waste needles

Reference: OHS Code, Part 35

LEGISLATED REQUIREMENTS

LEGISLATED REQUIREMENTS



Biohazardous material means a pathogenic organism, including a bloodborne pathogen, that, because of its known or reasonably believed ability to cause disease in humans, would be classified as Risk Group 2, 3 or 4 as defined by the Medical Research Council of Canada, or any material contaminated with such an organism



Reference: OHS Code, Part 2, B

Best Practices for Safe Handing and Disposal of Sharps

As a best practice, individuals working with sharps should consider the following:

- It is the personal responsibility of the person using the sharp to dispose of it immediately and safely.
- Sharps should not be passed directly from hand to hand, and handling should be kept to a minimum.
- · Needles and syringes should be disposed of in one piece
- · Always dispose of sharps at the point of use in a suitable container.
- Do not fill sharps containers more than two-thirds full or above the manufacturer's marked line.

References:

- http://www.cdc.gov/sharpssafety/index.html
- http://www.mhb.ie/mhb/OurServices/PoliciesProceduresGuidelines/ Appendix1/CentralServices/InfectionControl/d7691.PDF
- http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_ table=STANDARDS&p_id=10051

Legislation Applicable to Radiation Safety

In Alberta the *Radiation Protection Act* and *Radiation Protection Regulation* provide the legislative framework for a comprehensive system to protect workers and the public from overexposure to radiation. Employer and worker responsibilities are similar to those found in the *OHS Act and Regulation*. If there is a conflict between the *Radiation Protection Act* and the *OHS Act*, the *OHS Act* prevails.

The Radiation Protection Act

- Specifies that certain radiation equipment designated in the *Radiation Protection Regulation* require registration certificates prior to use
- Requires owners of radiation equipment to investigate radiation incidents or overexposures and take corrective actions
- Requires owners to establish and implement a quality assurance program and a regular preventive maintenance program for their diagnostic x-ray equipment
- Authorizes radiation health officers to conduct inspections of radiation facilities or radiation equipment
- Authorizes the Minister to issue written directives prohibiting the use of a radiation facility or radiation equipment until it is in compliance with the Act and Regulation

The Radiation Protection Regulation

- Specifies maximum exposure limits for ionizing and non-ionizing (laser, radiofrequency electromagnetic fields) radiation
- Requires employers to ensure that radiation workers are provided with and use a dosimeter to monitor their personal exposure to ionizing radiation
- Specifies that diagnostic or therapeutic x-ray equipment, cabinet x-ray equipment and Class 3B or 4 lasers require a registration certificate prior to use
- Requires owners of radiation equipment to ensure that shielding is adequate to ensure that the maximum exposure limits for ionizing radiation are not exceeded
- Requires that the installation and use of medical diagnostic x-ray equipment must comply with Health Canada's Safety Code 20A "X-ray Equipment in Medical Diagnosis Part A: Recommended Safety Procedures for Installation and Use"
- Requires that the installation and use of lasers in a health care facility must comply with Canadian Standards Association's Z386-08 "Laser Safety in Health Care Facilities"

The Radiation Protection legislation is available on the Government of Alberta – Alberta Employment and Immigration (AEI) website at: http://employment.alberta.ca/cps/rde/xchg/hre/hs.xsl/292.html

Information on the registration of designated radiation equipment in private and public medical facilities (including public dental facilities and podiatry facilities), and access to Safety Code 20A, is available on the College of Physicians and Surgeons of Alberta website at:

http://www.cpsa.ab.ca/facilitiesaccreditation/radiation_equipment.asp

For the use, storage, disposal or transportation of radiation sources produced by the nuclear fuel cycle i.e. those used in nuclear medicine the *Nuclear Safety and Control Act* (Canada) applies. This Act and its associated Regulations are available at: http://www.nuclearsafety.gc.ca/eng/resource/regulations

The Radiation Protection Act and Regulation do not apply to the installation and use of diagnostic ultrasound equipment. However, Health Canada has published Guidelines for the Safe Use of Diagnostic Ultrasound available at:

http://www.hc-sc.gc.ca/ewh-semt/pubs/radiation/01hecs-secs255/index-eng.php

Guidelines for the safe use of ultrasound physical therapy equipment can also be found on Health Canada's website at:

http://www.hc-sc.gc.ca/ewh-semt/pubs/radiation/safety-code_23-securite/index-eng.php

Resources for Hazard Assessment and Control:



- Appendix D: Sample Hazard Assessment form
- Work Safe Alberta e-learning program at:
 http://employment.alberta.ca/cps/rde/xchg/hre/hs.xsl/268.html
- e-learning program Back and Bums: Applying basic Ergonomics at: http://employment.alberta.ca/cps/rde/xchg/hre/hs.xsl/268.html
- Prevention and Control of Occupational Infections in Health Care:
 http://www.phac-aspc.gc.ca/publicat/ccdr-rmtc/02vol28/28s1/index.html
- Infection Control Guidelines: Hand Washing, Cleaning, Disinfection and Sterilization in Health Care at: http://www.phac-aspc.gc.ca/dpg-eng.php
- Preventing the Transmission of bloodborne pthogens in healthcare and public service settings at: http://www.phac-aspc.gc.ca/dpg-eng.php
- Mercury at the Work Site: http://employment.alberta.ca/documents/WHS/WHS-PUB_ch003.pdf
- Solvents at the Work Site:
 http://employment.alberta.ca/documents/WHS/WHS-PUB_ch013.pdf
- Fatigue and Safety at the Work Site:
 http://employment.alberta.ca/documents/WHS/WHS-PUB_erg015-1.pdf
- Fatigue, Extended Hours and Safety in the Work Site:
 http://employment.alberta.ca/documents/WHS-PUB_erg015.pdf
- Respiratory Protective Equipment: An Employer's Guide:
 http://employment.alberta.ca/documents/WHS-PUB_ppe001.pdf
- Medical Assessment of fitness to Wear a Respirator;
 http://employment.alberta.ca/documents/WHS-PUB_mg005.pdf
- Respiratory Protection Against Infection for Health Care Workers:
 http://www.ccohs.ca/oshanswers/prevention/respiratory_protection.html
- Waste Anaesthetic Gases, Hazards of:
 http://www.ccohs.ca/oshanswers/chemicals/waste_anesthetic.html
- Lasers Health Care Facilities:
 http://www.ccohs.ca/oshanswers/phys_agents/lasers.html
- Laser Plumes Health Care Facilities:
 http://www.ccohs.ca/oshanswers/phys_agents/laser_plume.html
- Canadian Centre for Occupational Health and Safety:
 http://www.ccohs.ca/oshanswers/
- Immunizations for Worker Exposure: http://employment.alberta.ca/documents/WHS/WHS-PUB_mg024.pdf
- Health Canada: Canadian Immunization Guideline: http://www.phac-aspc.gc.ca/im/index-eng.php
- Public Heath Agency of Canada: www.publichealth.gc.ca
- Part 26, OHS Code and OHS Code Explanation Guide: Ventilation Systems
- ANSI/ASHRAE Standards 62.1 2007 -Ventilation for Acceptable Indoor Air Quality: www.ashrae.org/standards

RESOURCES

 Association for the Advancement of Medical Instrumentation, Chemical sterilization and high-level disinfection in health care facilities, ANSI/AAMI ST58: 2005



- http://www.cdc.gov/sharpssafety/index.html
- http://www.mhb.ie/mhb/OurServices/PoliciesProceduresGuidelines/ Ap pendix1/CentralServices/InfectionControl/d7691.PDF
- http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_ table=STANDARDS&p_id=10051

RESOURCES

Radiation:

- http://employment.alberta.ca/cps/rde/xchg/hre/hs.xsl/292.html
- http://www.cpsa.ab.ca/facilitiesaccreditation/radiation_equipment.asp
- http://www.nuclearsafety.gc.ca/eng/resource/regulations
- http://www.hc-sc.gc.ca/ewh-semt/pubs/radiation/01hecs-secs255/ index-eng.php
- http://www.hc-sc.gc.ca/ewh-semt/pubs/radiation/safety-code_
 23-securite/index-eng.php

SECTION 4 WORKER COMPETENCY AND TRAINING

Legislation Specifically Applicable to Health Care Settings

Legislation related to lifting and handling may be found in several sections of the OHS legislation. Part 14 of the *OHS Code* provides some specific requirements:

Employer Responsibilities

Equipment

A heavy or awkward load includes equipment, goods, supplies, persons, and animals

An employer must:

- provide, where reasonably practicable, appropriate equipment for lifting, lowering, pushing, pulling, carrying, handling or transporting heavy or awkward loads
- ensure that workers use the equipment provided

Adapting heavy or awkward loads

If the equipment provided is not reasonably practicable in a particular circumstance or for a particular heavy or awkward load, the employer must take all practicable means

- to adapt the load to facilitate lifting, lowering, pushing, pulling, carrying, handling or transporting the load without injuring workers
- or to otherwise minimize the manual handling required to move the load

Assessing manual handling hazards

Before a worker manually lifts, lowers, pushes, pulls, carries, handles or transports a load that could injure the worker, an employer must perform a hazard assessment that considers

- · the weight of the load
- · the size of the load
- the shape of the load
- the number of times the load will be moved
- · the manner in which the load will be moved

Muscuoskeletal injuries

If a worker reports to the employer what the worker believes to be work related symptoms of a musculoskeletal injury, the employer must promptly

- Review the activities of that worker, and of other workers doing similar tasks, to identify work-related causes of symptoms, if any
- Take corrective actions to avoid further injuries if the causes of the symptoms are work related

Reference: OHS Code, Part 14: Lifting and Handling Loads

LEGISLATED REQUIREMENTS



Employers must ensure that workers

- are competent to work in a safe and healthy manner
- are trained in the safe operation of equipment and tools
- are trained in procedures for working with harmful substances
- are trained in use of PPE

Workers must

- take part in and apply training
- not perform work they are not competent to perform

KEY MESSAGES SECTION 4

Legislated Requirements

General requirements for worker training are included throughout the OHS Legislation¹. These include, but are not limited to the following:

Employer responsibilities

If a worker may be exposed to a harmful substance at a work site, the employer must:

- establish procedures that minimize the worker's exposure to the harmful substance
- ensure that a worker who may be exposed to the harmful substance is trained in the procedures, applies the training, and is informed of the health hazards associated with exposure to the harmful substance

Employers must ensure that a worker is trained in the safe operation of the equipment the worker is required to operate.

Reference: OHS Regulation, Section 15

LEGISLATED REQUIREMENTS

If the hazard assessment indicates the need for personal protective equipment (PPE) an employer must ensure that workers are trained in the correct use, care, limitations and maintenance of the PPE



LEGISLATED REQUIREMENTS

Reference: OHS Code, Part 28, 228(1)

Competent Worker

If work is to be done that may endanger a worker, the employer must ensure that the work is done



- by a worker who is competent to do the work or
- by a worker who is working under the direct supervision of a worker who is competent to do the work

Reference: OHS Code, Part 28, 228(1)

LEGISLATED REQUIREMENTS

^{1.} See definition under Glossary of Terms

What is a competent worker?



LEGISLATED REQUIREMENTS

"...adequately qualified, suitably trained, and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision"

Reference: OHS Regulation, Section 1

Worker Responsibilities

- A worker who is not competent to perform work that may endanger the worker or others must not perform the work except under the direct supervision of a worker who is competent to perform the work
- A worker must immediately report to the employer equipment that:
- is in a condition that will compromise the health or safety of workers using or transporting it
- · will not perform the function for which it is intended or was designed
- is not strong enough for its purpose, or
- · has an obvious defect

Reference: OHS Regulation, Section 14

Workers must:

- · participate in the training provided by an employer
- apply the training

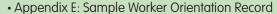
Reference: OHS Regulation, Section 15

Specific requirements for worker training are identified throughout the OHS legislation. Refer to these for job specific requirements.



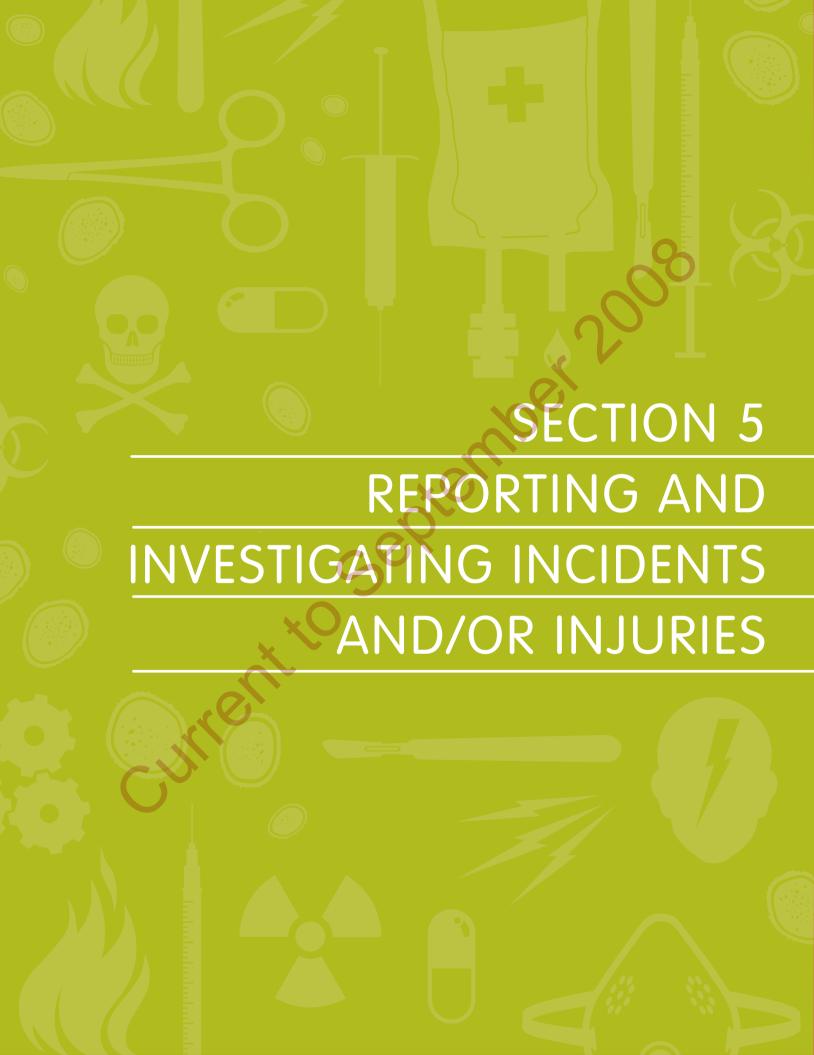


Resources for Worker Competency and Training:



- Appendix F: Sample Record of Training
- Best Practices for Cleaning, Disinfection & Sterilization, Provincial Infectious Diseases Advisory Committee (PIDAC), Ministry of Health and Long-Term Care/Public Health Division/Provincial Infectious Diseases: http://www.health.gov.on.ca/english/providers/program/infectious/ diseases/best_prac/bp_cds_2.pdf
- Flash Sterilization in Health Care Settings, Provincial Infectious Diseases Advisory Committee (PIDAC) Ontario Hospitals Association: http://www.health.gov.on.ca/english/providers/program/infectious/ pidac/fact_sheet/fs_flash_sterile_20080117.pdf
- Guidelines for Infection Prevention and Control in the Physician's Office, BC Centre for Disease Control, 2004: http://cme.viha.ca/Hot_Topics/ PDFs/Infection_Control_In_Physician_Office_Final.pdf
- Infection Control in the Physician's Office, The College of Physicians and Surgeons of Ontario, Infection Control in the Physician's Office, 2005: http://www.cpso.on.ca/Publications/publications.htm
- Infection Prevention and Control Best Practices for Long-term Care, Home and Community Care, including Health Care Offices & Ambulatory Clinics, Canadian Committee on Antibiotic Resistance, 2007: http://www.ccar-ccra.com/english/pdfs/IPC-Best Practices-June2007.pdf







Employers must:

- report serious incidents and fatalities to the Government of Alberta (GOA) workplace health and safety
- investigate incidents that cause injury or have the potential to cause a serious injury.



KEY MESSAGES SECTION 5

REQUIREMENTS

Legislated Requirements

Under Section 18 of the *OHS Act*, if a serious injury or accident occurs at a work site or if any other serious injury or other accident that has the potential of causing serious injury to a person occurs at the work site, the employer shall:



- Carry out an investigation into the circumstances surrounding the serious injury or accident
- Prepare a report outlining the circumstances of the serious injury or accident and the corrective actions, if any, undertaken to prevent the recurrence of the serious injury or accident and
- Ensure that a copy of the report is readily available for inspection by an officer
- Retain the report for 2 years

ern

Reference: OHS Act, Section 18

For more information please refer to the Workplace Health and Safety Reporting Injuries and Incidents bulletin available at http://employment.alberta.ca/documents/WHS/WHS-PUB_li016.pdf

To report incidents or concerns call the Workplace Health and Safety (WHS) Contact Centre at:

Edmonton and surrounding area: 780 415-8690 Throughout Alberta: 1-866-415-8690 or go to www.worksafely.org

Also refer to the e-learning program on the investigation of incidents at: http://employment.alberta.ca/whs/learning/Incident/Incident.htm

Two of the events that employers must report to Government of Alberta Workplace Health and Safety that may be seen in a healthcare setting include:

- An injury or accident that results in death
- An injury or accident that results in a worker being admitted to a hospital for more than 2 days



REQUIREMENTS

Reference: OHS Act, Section 18 (see OHS Act for complete list)

Note: There are also separate requirements for reporting injuries to the Worker's Compensation Board (WCB). These are covered under the Worker's Compensation Act, which is different from the Occupational Health and Safety legislation. For more information and access to WCB publications and forms, go to: www.wcb.ab.ca

Promptly Investigate All Incidents and Near-Misses

Employers should investigate all incidents and near-misses.

Near-misses are incidents that cause no visible injury or damage but that could have caused serious injuries or property damage under slightly different circumstances. They should be investigated because they point to conditions or work practices that must be changed to prevent future incidents.

Everyone at the workplace has a role to play in an incident investigation. Workers must report incidents to their supervisors. The owner, employer, or supervisor should promptly start investigations of incidents. If possible, one employer representative and one worker representative should participate in the investigation. After the investigation is complete, an investigation report must be prepared.

For more information on incident investigation visit the Workplace Health & Safety eLearning program on Incident Investigation at: http://employment.alberta.ca/whs/learning/Incident/Incident.htm

Resources for Reporting and Investigating Incidents and Injuries:



- Appendix G: Sample Incident Investigation form
- eLearning program on Incident Investigation at:
 http://employment.alberta.ca/whs/learning/Incident/Incident.htm
- Reporting Injuries and Incidents:
 http://employment.alberta.ca/documents/WHS/WHS-PUB_li016.pdf





Employers must:

• provide first aid services, supplies and equipment that meet the requirements outlined in the *OHS Code*, Part 11.

· maintain first aid records for 3 years



KEY MESSAGES SECTION 6

Legislated Requirements

First aid means

"the immediate and temporary care given to an injured or ill person at a work site using available equipment, supplies, facilities, or services, including treatment to sustain life, to prevent a condition from becoming worse or to promote recovery"

Reference: OHS Code, Part 1



In Alberta, workplace First Aid requirements are outlined in Part 11 of the *Occupational Health and Safety (OHS) Code*. Specific requirements are listed in Schedule 2 of the *OHS Code* and are determined based on:

- · How hazardous the work is
- The time taken to travel from the work site to a health care facility (hospital)
- · The number of workers on each shift

Employer Responsibilities

Employers are responsible for:

- Providing first aid services, supplies and equipment in accordance with Schedule 2 of the Code
- Ensuring that the services, supplies and equipment are located near the work site they serve and are maintained, available and accessible during all working hours
- Communicating the information about first aid to workers
- Ensuring arrangements are in place to transport injured or ill workers from the work site to the nearest health care facility
- Ensuring that first aiders are trained
- Ensuring that injuries and acute illnesses are reported to the employer and recorded, and that records are kept confidential
- Maintain first aid records for 3 years.

For more detailed requirements refer to Part 11 and Schedule 2 of the OHS Code.

Acceptances

Under the *OHS Code*, Part 11, Section 178(1), an acceptance may be granted by the Director of Medical Services for services that provide equal to or better worker protection than those outlined in the legislation.

LEGISLATED REQUIREMENTS

LEGISLATED REQUIREMENTS

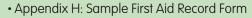
RESOURCES

Director of Medical Services means a physician appointed by the Minister for the administration of the Occupational Health and Safety legislation.



OHS Act Section 1 (h), 5

Resources for First Aid:

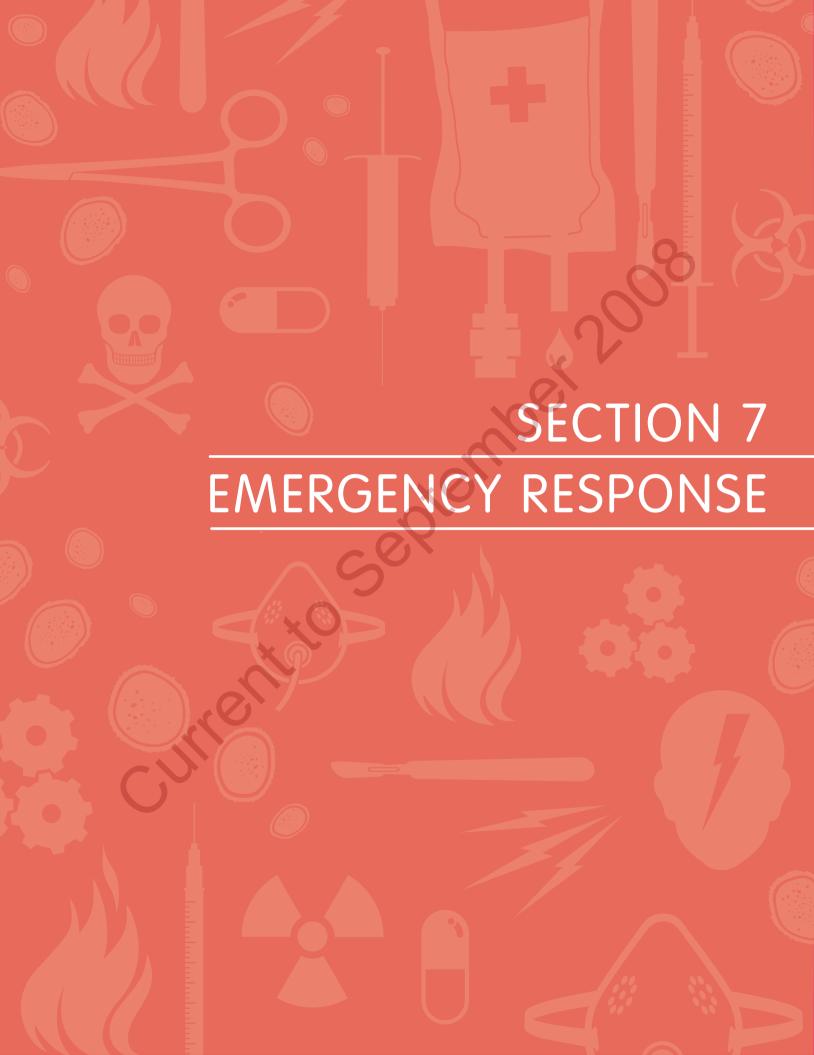




Publication on First Aid Records at:
 http://employment.alberta.ca/documents/WHS/WHS-PUB_fa009.pdf









Employers must:

- have a written emergency response plan that includes all the elements outlined in the *OHS Code* Part 7
- · communicate this plan to all workers



KEY MESSAGES SECTION 7

An emergency may be defined as "any situation or occurrence of a serious nature, developing suddenly and unexpectedly, and demanding immediate attention".²

In Alberta, the *OHS Code*, Part 7 requires employers to establish an emergency response plan for response to an emergency that may **require rescue or evacuation**.

Also reference the emergency response plan for your region for more information.

Legislated Requirements

- Employers must establish an emergency response plan in case of an emergency that may require rescue or evacuation. The plan must be written, and affected workers must be consulted in the development of the plan.
- The emergency response plan must include:
- The identification of potential emergencies (based on the hazard assessment)
- Procedures for dealing with the identified emergencies
- The identification of, location of and operational procedures for emergency equipment
- The emergency response training requirements
- The location and use of emergency facilities
- The fire protection requirements
- The alarm and emergency communication requirements
- The first aid services required
- Procedures for rescue and evacuation
- The designated rescue and evacuation workers

Reference: OHS Code, Part 7

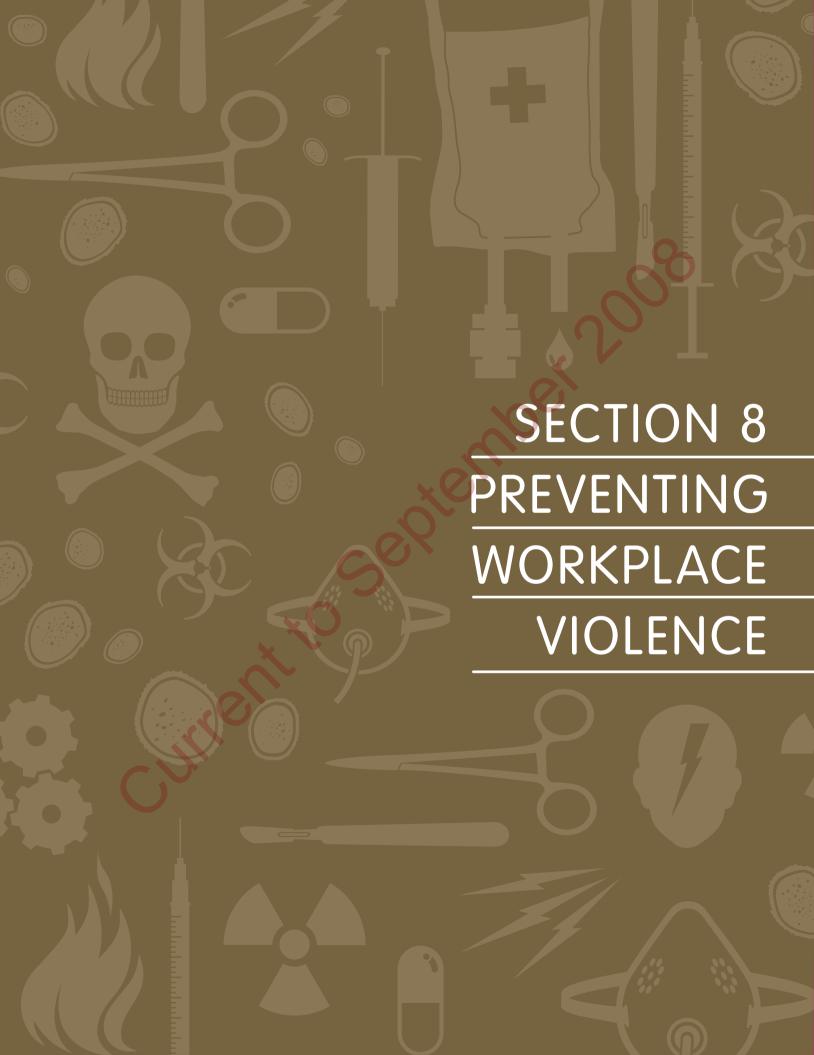
Resources for Emergency Response Planning:

- Appendix J. Sample Emergency Response Plan form
- Alberta Emergency Management Agency: http://www.aema.alberta.ca/
- Alberta Health and Wellness: Pandemic Information:
 http://www.health.alberta.ca/influenza/pandemic_influenza.html
- PHAC Emergency Preparedness and Response:
 http://www.phac-aspc.gc.ca/ep-mu/index-eng.php

2. See definition under Glossary of Terms

LEGISLATED REQUIREMENTS







Employers must consider workplace violence when conducting their hazard assessment and implement appropriate controls to protect workers.



SECTION 8: PREVENTING WORKPLACE VIOLENCE

The potential for violence in the workplace is increasingly recognized as a hazard at healthcare workplaces in Alberta. Under the *OHS Code*, Part 27, employers are required to consider workplace violence when conducting their hazard assessment. Identifying situations where workers may be exposed to violence assists the employer in the implementation of controls such as policies and procedures to decrease the possibility of their workers being exposed to violence.

Legislated Requirements

Employer Responsibilities

Employers must:

- Ensure that workplace violence is considered as a hazard.
- Develop a policy and procedures for potential workplace violence
- Ensure workers are instructed in the recognition, reporting and response to workplace violence

Reference: OHS Code, Part 27

LEGISLATED REQUIREMENTS

Categories of Workplace Violence

Violence in the workplace may fall into one of the following categories:

- Stranger violence (such as a robbery/drug seekers)
- Client/customer violence
- · Co-worker violence
- · Violence related to domestic issues

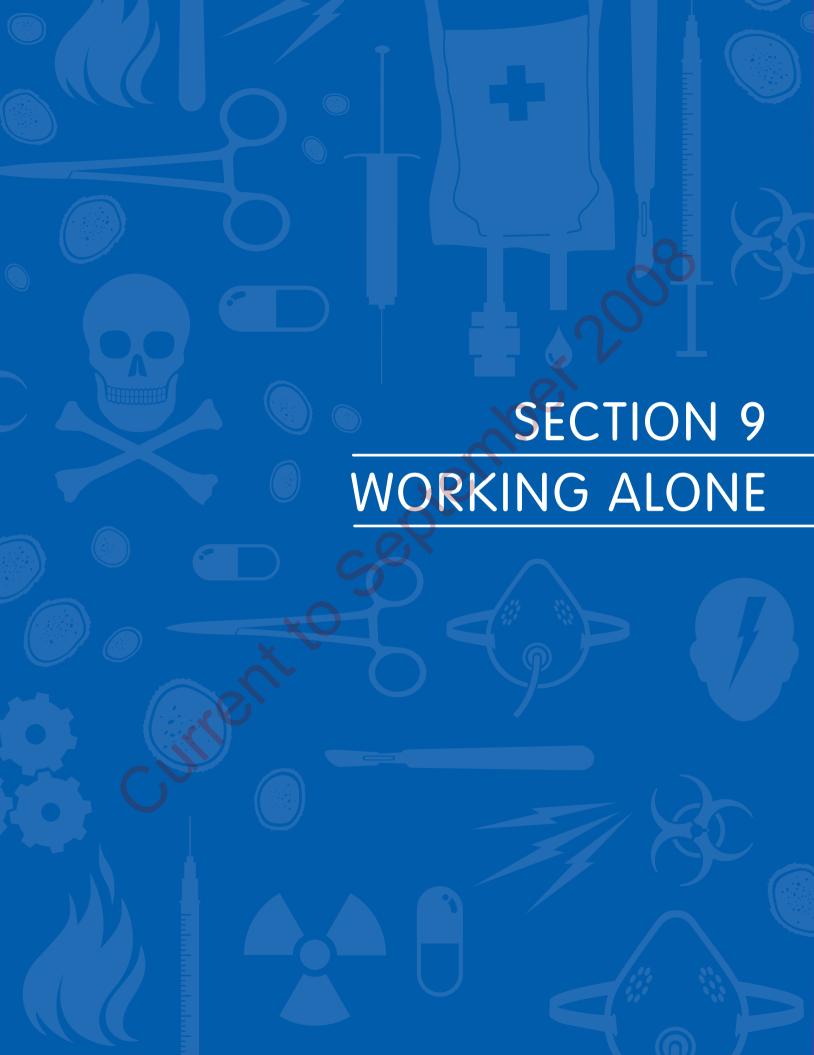
Factors to consider when assessing the risk of workplace violence

Does the work involve any of the following?

- · Working alone or in small numbers
- · Working between 11 pm and 6 am
- · Providing emergency interventions
- · Working with patients in a healthcare setting
- · Working with unstable or violent individuals
- Working at or near a site targeted by protestors or action groups
- · Working with or having controlled substances on-site
- · Working in proximity to businesses that experience an elevated risk such as:
 - retail, especially with money, prescription drugs, jewellery
 - · where alcohol is sold or consumed
 - law enforcement, correction, security or any other inspection or regulatory occupation
- · Working in or near areas of increased crime
- · Working in isolated or remote areas
- · Working with persons where domestic violence is a concern
- · Visiting clients/patients in their homes

Resources for Preventing Workplace Violence:

- Appendix I: Sample Workplace Violence Prevention Policy and Procedures
- Alberta WCB: Preventing Workplace Violence: www.wcb.ab.ca/workingsafely/violence.asp
- Work Safe Alberta: Preventing Violence and Harassment at the Workplace: http://employment.alberta.ca/documents/WHS/WHS-PUB_vah001.pdf
- WorkSafeBC: Injury Prevention Resources for Healthcare Violence: http://www2.worksafebc.com/Portals/HealthCare/Violence.asp
- Joint Statement on Family Violence, College of Registered Nurses of Alberta, College of Registered Psychiatric Nurses of Alberta, College of Licensed Practice Nurses of Alberta, 2008: http://www.nurses. ab.ca/Carna-Admin/Uploads/joint_stmnt_family_violence_web.pdf
- Staff Abuse: Prevention and Management (This one may also be appropriate for Hazards Assessment and Control):
- http://www.hbas.ca/sapm/index.html





Employers must ensure workers who are working alone have a means of communication to obtain assistance if required.



SECTION 9: WORKING ALONE

A worker is "working alone" if they are at a work site and assistance is not readily available in case of emergency, injury, or illness.

Legislated Requirements

Employer Responsibilities

Employers must ensure that an effective communication system is in place between a worker who works alone and persons who can provide assistance in case of an emergency, illness, or injury

This may include one or more of the following methods:

- Radio, telephone, or other electronic communication
- Visiting or contacting the worker at intervals appropriate to the nature of hazards of the work

Reference: OHS Code, Part 28

LEGISLATED REQUIREMENTS

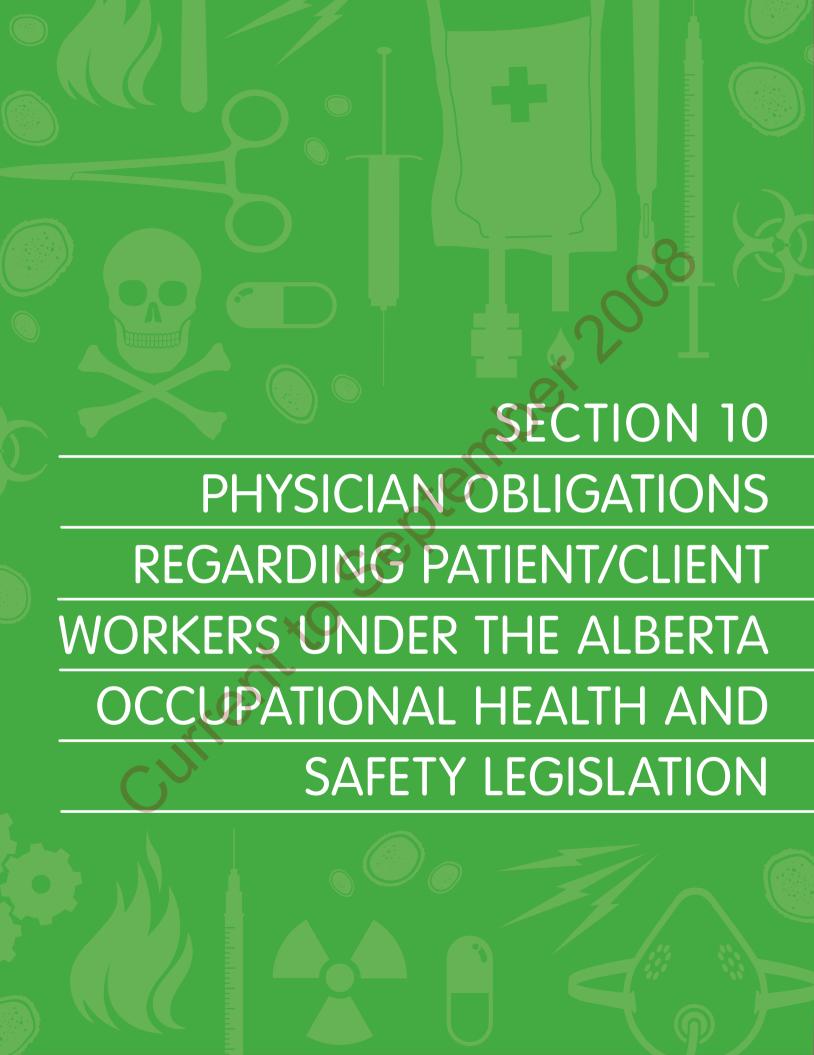
Resources related to Working Alone:



- Working Alone Working with Patients: http://www.ccohs.ca/ oshanswers/hsprograms/workingalone_patients.html
- Working Alone Off-Site: http://www.ccohs.ca/oshanswers/ hsprograms/workingalone_offsite.html









Physicians in Alberta have specific obligations under the *Occupational Health and Safety legislation* to:



- report notifiable diseases to the Government of Alberta, Workplace Health and Safety, Director of Medical Services
- furnish reports on workers who have work-related illnesses or injuries when requested by the the Government of Alberta, Workplace Health and Safety, Director of Medical Services

SECTION 10: KEY MESSAGES

In addition to their responsibilities for health and safety as employers and as workers, physicians have specific obligations under Alberta Occupational Health and Safety legislation related to workers who they see as clients/patients. Basic information on these obligations are provided in this section.

Obligation to Report Notifiable Occupational Diseases

Physicians are required to report notifiable occupational diseases to the Alberta Government, Workplace Health and Safety, Director of Medical Services.¹

Legislated requirements

When a physician, in the course of the physician's practice as a physician, finds that a person examined by the physician is affected with or is suffering from a notifiable disease, the physician shall, within 7 days after the diagnosis of that disease, notify a Director of Medical Services in writing of the name, address and place of employment of that person and the name of the notifiable disease.



REQUIREMENTS

Reference: OHS Code, Part 22

^{1.} The Director of Medical Services means a physician appointed by the Minister for the administration of the Occupational Health and Safety legislation. Reference OHS Act Sections 1 (h), 5. The Director of Medical Services is an occupational health physician who is a member of the staff of the Government of Alberta, Workplace Health and Safety.

What is a notifiable disease

A notifiable disease means a disease or a state of ill health designated in the *OHS Regulation* as a notifiable disease.



Reference: OHS Code, Part 22

The following are notifiable diseases for the purpose of Section 22 of the OHS Act:

- asbestosis
- mesothelioma
- asbestos-induced lung cancer
- asbestos-induced laryngeal cancer
- · asbestos-induced gastrointestinal cancer
- coal worker's pneumoconiosis
- silicosis

REQUIREMENTS

- · lead poisoning
- noise-induced hearing loss

Reference: OHS Regulation, Section 6

For more detailed information and to access the notifiable disease sample reporting form go to the WHS Publication: *Notifiable Occupational Diseases*– *Information for Physicians* at: http://employment.alberta.ca/documents/WHS/WHS-PUB_mg030.pdf

Health Assessments, Medical Monitoring and Reporting Requirements

Health assessments for workers exposed to asbestos, silica, or coal dust

Section 24 of the *OHS Act* outlines that workers who are employed in a hazardous occupation or at a hazardous work site may be required to have regular medical examinations. The specific requirements for these examinations are outlined in Part 4, Section 40 of the *OHS Code*.



Legislated Requirements

Requirements for workers who may be exposed to asbestos, silica or coal dust include:



- A health assessment of the worker must include the following:
- The identity of the worker and the employer
- The date of the medical examination, chest x-ray and spirogram
- A 35 centimetres by 43 centimetres postero-anterior view chest x-ray, including a radiologist's report
- A spirogram, conducted by a pulmonary function technician, including determinants of force expiratory volume in the first second and forced vital capacity
- · A history covering
 - occupational exposures to asbestos, silica, coal dust, or other industrial dusts and carcinogens
 - significant exposures to asbestos, silica, coal dust, other dust and carcinogens during non work-related activities
 - significant symptoms that may indicate silicosis, pneumoconiosis, asbestosis or cancer.
 - past and current medical diagnosis of respiratory disease and
 - the worker's smoking history
- A written interpretation and explanation of the results by a physician of the health assessment to the worker not more than 60 days after the tests are completed

The physician must give the written interpretation and explanation of the results of the health assessment to the worker not more than 60 days after the tests are completed.

The physician must ensure that the records of the health assessment are kept for not less than 30 years.

The person with custody of the health assessment record must ensure that no person, other than the worker or health professional who conducts the health assessment, the staff supervised by the health professional or another person authorized by law to have access, has access to the exposed worker's health assessment unless:

- the record is in a form that does not identify the worker, or
- the worker gives written permission for access by another person.

Reference: OHS Code, Part 4, Section 40

LEGISLATED REQUIREMENTS

Medical monitoring for lead

Legislated Requirements

Under the *OHS Code*, Part 4, Section 43, employers have responsibilities to ensure workers exposed to lead at a work site have access to blood lead testing.

Employer Responsibilities

- An employer must ensure that blood lead testing is available to a worker
 if the worker at a work site could reasonably be expected to have an
 elevated body burden of lead.
- An employer must ensure that a worker exposed to lead is informed of the availability of the blood lead test
- The employer must pay the cost of a blood lead test.
- An exposed worker may refuse to undergo a blood level test by giving the employer a written statement refusing it
- An employer must not coerce, threaten or force a worker into refusing part or all of the test.

Reference: OHS Code, part 4, Section 43

REQUIREMENTS

Physician Responsibilities

Physicians have a responsibility under Section 22 of the OHS Act to report elevated blood lead results to the Director of Medical Services, as outlined under Notifiable Disease Reporting. A worker with a blood lead level greater than 2.5 umol/L or symptoms diagnosed as a result of a lead exposure, is considered to have lead poisoning. The Director or Medical Services must be notified if a worker has a blood lead level of 2.5 umo/L or greater. 2

 $^{2.\} Lead\ at\ the\ Work\ Site: {\bf http://employment.alberta.ca/documents/WHS-PUB_ch061.pdf}$

Medical Reports

A physician who performs or supervises a medical examination of a worker as required under the OHS legislation shall, on the request of a Director of Medical Services, furnish any medical reports that a Director may require.



A physician, nurse or first aid attendant who attends a worker who became ill or was injured while engaged in an occupation shall, on the request of a Director of Medical Services, furnish any reports that a Director may require.

Reference: OHS Act, Section 23

LEGISLATED REQUIREMENTS

NOTE: There are separate reporting requirements for the Worker's Compensation Board (WCB). For information on WCB reporting go to their website at: http://www.wcb.ab.ca/home/

Resources for Physician Obligations related to patient/client workers

- Notifiable Occupational Diseases Information for Physicians at:
 http://employment.alberta.ca/documents/WHS/WHS-PUB_mg030.pdf
- Release of Medical Information: A Guide for Alberta Physicians, College of Physicians and Surgeons of Alberta (CPSA)
- Lead at the Work Site:
 http://employment.alberta.ca/documents/WHS/WHS-PUB_ch061.pdf

Appendix A: Glossary of Terms

Acute Illness or Injury – A physical injury or sudden occurrence of an illness that results in the need for immediate care.

Alberta Employment and Immigration (AEI) – The government ministry responsible for the *Occupational Health and Safety Act, Regulation and Code*. Its job is to work with employers and workers to ensure legislation is followed as much as possible to prevent workplace incidents, injuries and illnesses, and to ensure employers and workers are educated in their occupational health and safety duties.

Best Practice – For the purpose of this document, a best practice in health and safety is defined as a program, process, strategy or activity that: has been shown to be effective in the prevention of workplace injury or illness; has been implemented, maintained and evaluated; is based on current information; and is of value to, or transferable to, other organizations. Best practices are living documents and must be reviewed and modified on a regular basis to assess their validity, accuracy and applicability. They may and often do exceed the requirements of OHS legislation.

Competent Worker – An adequately qualified, suitably trained person with sufficient experience to safely perform work without supervision.

Director of Medical Services – a physician appointed by the Minister for the administration of the Occupational Health and Safety legislation. Reference OHS Act Sections 1 (h), 5. The Director of Medical Services is an occupational health physician who is a member of the staff of the Government of Alberta, Workplace Health and Safety.

Due Diligence – The level of judgment, care, prudence, determination and activity that a person would reasonably be expected to do under particular circumstances.

Emergency – Any situation or occurrence of a serious nature, developing suddenly and unexpectedly, and demanding immediate attention.

Employer – You are an employer if: you employ one or more workers; you are designated to represent an employer; your responsibility is to oversee workers' health and safety; or you are self-employed.

Equipment – A thing used to equip workers at a worksite; includes tools, supplies, machinery and sanitary facilities.

First Aid – The immediate and temporary care given to an injured or suddenly ill person at a worksite using available equipment, supplies, facilities or services. First aid has three objectives: preserve life; prevent the injury or illness from becoming worse; promote recovery.

First Aider (emergency, standard or advanced) – A competent individual designated by an employer to provide first aid to workers at a worksite.

Hazard – Any situation, condition or thing that may be dangerous to the safety or health of workers. There are four standard hazard categories: physical hazards; chemical hazards; biological hazards; and psychological hazards.

Hazard Assessment – Careful evaluation of all equipment, machinery, work areas and processes to identify potential sources of hazards that workers may be exposed to.

Hazard Control – Control measures implemented to eliminate or reduce the risk of harm to workers.

Imminent Danger – Any danger that isn't normal for a job, or any dangerous conditions under which a worker wouldn't normally carry out their work. If workers think their work may put them or another worker in imminent danger, they must refuse to do it. Reference *OHS Act*.

Incident – An undesired event that results in physical harm to a person or damage to property, including near misses.

Joint Health and Safety Committee – A group of worker and employer representatives working together to identify and solve health and safety problems at the workplace. In Alberta, the establishment of a committee is **voluntary**, except for those workplaces required by Ministerial Order to have a committee.

Near Miss – An incident that did not cause visible injury or property damage but that could have resulted in serious injury, personal harm, death or property damage.

OHS Act – The *Occupational Health and Safety Act* sets out legislative framework to ensure workplace conditions are safe and do not pose a danger of injury or illness. A general duty clause serves as a blanket statement that employers are accountable for the health and safety of workers.

OHS Code – The *Occupational Health and Safety Code* sets out specific health and safety rules for work-related operations and practices within Alberta's various industries to ensure that workplace conditions are safe and do not pose a danger of injury or illness.

OHS Regulation – The *Occupational Health and Safety Regulation* sets out requirements for specific workplace conditions and work practices that must be met in order for a workplace to be considered in compliance with OHS legislation.

Partnerships in Health and Safety – A voluntary Alberta program of Workplace Health and Safety based on the concept that when employers and workers build effective Health and Safety Management Systems the human and financial costs of workplace injuries and illnesses will be reduced.

Personal Protective Equipment (PPE) – Equipment or apparel that when worn lessens the potential harmful effects of a known hazard (i.e. gloves, hard hats, steel-toed footwear, etc.)

Reasonably Practicable – A legally defined term that is assessed using the reasonable person test.

Reasonable Person Test – The assessment of what a dozen peers would consider reasonable in a similar set of circumstances, resulting in a balanced and wise judgment that could be defended to others.

Safe Work Practice – A written set of guidelines that establishes a standard of performance for an activity.

Safe Work Procedure – A written, step-by-step description of how to perform a task from beginning to end.

Standards – Standards are produced by voluntary organizations, such as the Canadian Standards Association (CSA), American National Standards Institute (ANSI) and the International Organization for Standardization (ISO). Standards do not have the power of law. However, if they are adopted by legislation, they become part of the law and are enforceable. For example, if the *OHS Code* states that workers must wear footwear approved to a particular CSA standard, then the CSA standard has the power of law.

WHMIS (Workplace Hazardous Materials Information System)

 A comprehensive plan for providing information on the safe use of hazardous materials in Canadian workplaces. The information is provided by means of: product labels; Material Safety Data Sheets (MSDS); and worker education programs.

Worker – A person engaged in an occupation, including managers, supervisors and volunteers.

Workplace Health and Safety (WHS) – A division/department of Alberta Employment and Immigration.



Current to September 2008

Appendix B: Resources

Additional resources are available at the Alberta Government, Workplace Health and Safety website at: www.worksafely.org or by calling the Contact Centre at: 1-866-415-8690

Legislation

- · OHS Act: http://www.qp.gov.ab.ca/documents/acts/O02.cfm
- OHS Regulation: www.qp.gov.ab.ca/documents/Regs/2003_062.cfm?frm_isbn=077971752X
- OHS Code: http://employment.alberta.ca/documents/WHS/WHS-LEG_ohsc_2006.pdf
- OHS Code Explanation Guide: http://employment.alberta.ca/cps/rde/xchg/hre/hs.xsl/3969.html

Publications Online

General Legislation

- Employer's Guide: Occupational Health and Safety Act: http://employment.alberta.ca/documents/WHS/WHS-PUB_li009.pdf
- Worker's Guide: Occupational Health and Safety Act: http://employment.alberta.ca/documents/WHS-PUB_li008.pdf
- Due Diligence: http://employment.alberta.ca/documents/WHS/WHS-PUB_li015.pdf

First Aid

- Developing a First Aid Plan: http://employment.alberta.ca/documents/WHS/WHS-PUB_fa012.pdf
- First Aid Records: http://employment.alberta.ca/documents/WHS/WHS-PUB_fa009.pdf
- Workplace First Aiders and Legal Requirements: http://employment.alberta.ca/documents/WHS/WHS-PUB_fa011.pdf

Incident/Injury Reporting

 Reporting Injuries and Incidents: http://employment.alberta.ca/documents/WHS/WHS-PUB_li016.pdf

Radiation

· Radiation Safety Institute of Canada: www.radiationsafety.ca

e-Learning Programs listed below are available at www.worksafely.org or at: http://employment.alberta.ca/cps/rde/xchg/hre/hs.xsl/268.html

- · Alberta Occupational Health and Safety Legislation
- · Hazard Assessment and Control
- · Incident Investigation
- · Recognizing Hazards- See it again for the first time
- Shift Work and Fatigue
- · Impairment and Workplace Health and Safety
- · Basic Ergonomics: Backs and Bums
- Fall Protection
- · Noise
- · Basic Health and Safety
- · Health and Safety Management Systems
- · Fun Quizzes

Other Resources

- · Canadian Centre for Occupational Health and Safety: www.ccohs.ca
- · Canadian Society of Safety Engineering: www.csse.org
- · Institute For Work and Health: www.iwh.on.ca
- · National Safety Council: www.nsc.org
- · Workers' Compensation Board- Alberta www.wcb.ab.ca

Workplace Hazardous Materials Information System

- Explanation Guide for Part 29 of the OHS Code, available online at: http://employment.alberta.ca/documents/WHS/WHS-LEG_ohsc_2006_p29.pdf
- WHMIS Information for Employers: http://employment.alberta.ca/ documents/WHS/WHS-PUB ch008.pdf
- WHMIS Information for Workers: http://employment.alberta.ca/documents/WHS/WHS-PUB_ch007.pdf
- Health Canada WHMIS Site: http://www.hc-sc.gc.ca/ewh-semt/ occup-travail/whmis-simdut/index-eng.php

Materials Handling

 How Much Can I Lift?: http://employment.alberta.ca/documents/WHS/ WHS-PUB_erg013.pdf

Worker Competency and Training

Best Practices for Cleaning, Disinfection & Sterilization, Provincial
Infectious Diseases Advisory Committee (PIDAC), Ministry of Health
and Long-Term Care/Public Health Division/Provincial Infectious Diseases:
http://www.health.gov.on.ca/english/providers/program/infectious/
diseases/best_prac/bp_cds_2.pdf

- Flash Sterilization in Health Care Settings, Provincial Infectious Diseases
 Advisory Committee (PIDAC) Ontario Hospitals Association:
 http://www.health.gov.on.ca/english/providers/program/infectious/pidac/fact_sheet/fs_flash_sterile_20080117.pdf
- Guidelines for Infection Prevention and Control in the Physician's Office, BC Centre for Disease Control, 2004: http://cme.viha.ca/Hot_Topics/ PDFs/Infection_Control_In_Physician_Office_Final.pdf
- Infection Control in the Physician's Office, The College of Physicians and Surgeons of Ontario, Infection Control in the Physician's Office, 2005: http://www.cpso.on.ca/Publications/publications.htm
- Infection Prevention and Control Best Practices for Long-term Care, Home and Community Care, including Health Care Offices & Ambulatory Clinics, Canadian Committee on Antibiotic Resistance, 2007: http://www.ccar-ccra.com/english/pdfs/IPC-BestPractices-June2007.pdf

Preventing Workplace Violence

- Joint Statement on Family Violence, College of Registered Nurses of Alberta, College of Registered Psychiatric Nurses of Alberta, College of Licensed Practice Nurses of Alberta, 2008: http://www.nurses.ab.ca/Carna-Admin/ Uploads/joint_stmnt_family_violence_web.pdf
- Staff Abuse: Prevention and Management (This one may also be appropriate for Hazards Assessment and Control): http://www.hbas.ca/sapm/index.html

Working Alone

- Working Alone Working with Patients: http://www.ccohs.ca/oshanswers/hsprograms/ workingalone_patients.html
- Working Alone Off-Site: http://www.ccohs.ca/oshanswers/hsprograms/workingalone_ offsite.html

current to september 2008

Appendix C:

Occupational Health and Safety Code

The following lists summarizes all topics covered by the *OHS Code*. It is provided here only to increase awareness of the many parts of the *OHS Code*. For the most recent version access the Government of Alberta (GOA) Workplace Health and Safety (WHS) website. If any Parts of the *OHS Code* apply to your work site refer to the *OHS Code* and Explanation Guides available at: http://employment.alberta.ca/cps/rde/xchg/hre/hs.xsl/3969.html

Торіс	Part of OHS Code
	10
Definitions and General Application	Part 1
Hazard Assessment, Elimination and Control	Part 2
Specifications and Certifications	Part 3
Chemical Hazards, Biological Hazards and Harmful Substances	Part 4
Confined Spaces	Part 5
Cranes, Hoists and Lifting Devices	Part 6
Emergency Preparedness and Response	Part 7
Entrances, Walkways, Stairways and Ladders	Part 8
Fall Protection	Part 9
Fire and Explosion Hazards	Part 10
First Aid	Part 11
General Safety Precautions	Part 12
Joint Work Site Health and Safety Committee	Part 13
Lifting and Handling Loads	Part 14
Managing the Control of Hazardous Energy	Part 15
Noise Exposure	Part 16
Overhead Power Lines	Part 17
Personal Protective Equipment	Part 18
Powered Mobile Equipment	Part 19
Radiation Exposure	Part 20
Rigging	Part 21
Safeguards	Part 22
Scaffolds and Temporary Work Platforms	Part 23

Topic	Part of OHS Code
Toilets and Washing Facilities	Part 24
Tools, Equipment and Machinery	Part 25
Ventilation Systems	Part 26
Violence	Part 27
Working Alone	Part 28
Workplace Hazardous Materials Information System (WHMIS)	Part 29
Demolition	Part 30
Diving Operations	Part 31
Excavating and Tunneling	Part 32
Explosives	Part 33
Forestry	Part 34
Health Care and Industries with Biological Hazards	Part 35
Mining	Part 36
Oil and Gas Wells	Part 37
Tree Care Operations	Part 39
Utility Workers – Electrical	Part 40
Work Requiring Rope Access	Part 41

Note

The following documents are meant to be used as a foundation in developing your company's own forms and procedures. As no two workplaces are the same, it will be necessary to customize these forms and procedures to your own specific situation. The department makes no warranty as the applicability, completeness, or effectiveness of any these documents in developing your specific health and safety programs. It is strongly advised to use your own qualified safety professional(s) and/or legal advisor to develop processes that meet or exceed the minimum legislative requirements.

Surrent to September 2008

Appendix D: Sample Hazard Assessment Form

Step 1: On the Hazard Identification checklist, check off all the hazards or potential hazards that are present at your work site. Add any identified hazards specific to your work site to the list:

Hazard Identification

Physical Hazards	Chemical Hazards
Lifting and handling loads Repetitive motion Slipping and tripping Moving parts of machinery Pressurized systems Vehicles Fire Electricity Noise Lighting Temperatures Lasers lonizing Radiation Non-ionizing Radiation Workplace Violence Other: Sharps Other	Chemicals (identify types) Type: Glutaraldehyde Type: Formaldehyde Type: Anaesthetic gases Type: Cleaning agents Type: Bleach Dusts Fumes (identify types) Type: Cidex Type: OPA Type: OPA Type: Mists and Vapors (identify types) Type: Type: Type: Other:
Biological Hazards	Psychosocial Hazards
Viruses Fungi (mould) Bacteria Blood and Body Fluids Sewage Other: Other:	Working conditions Fatigue Stress Other: Working Alone Other: Other: Other:

NOTE: If you work in a high hazard industry, an industry specific checklist may be required.

Step 2: Hazard Assessment and Control Sheet (Sample – Page 2)

- Take the hazards identified on the checklist above and list them on the Hazard Assessment and Control Sheet
- Identify the controls that are in place: engineering, administrative, PPE or combination for each hazard

					Ch
Company			Location		70
Date of assessme	ent		Completed b	ру	0
Hazard	Controls in Plac	Controls in Place			Date/Person
nuzulu	Engineering	Administrative		Action Required	Responsible
				70	
			XO		
		60	2		
		0			

Appendix E: Sample Worker Orientation Record

This is an example of a checklist you may wish to use when training new workers on health and safety in your workplace.

Worker's name			28
Date worker was hired			Date of orientation
Supervisor's name			
Orientation Topics Covered?			Written work procedures (list them here)
	Yes	No	706
Health and safety responsibilities			
Health and safety rules			
How to get first aid			XO
Location of first aid kit			
Location of fire exits and fire extinguishers			Other topics covered (list them here)
How to report unsafe conditions			
Obligation to refuse unsafe work			
WHMIS			
Location of MSDSs			
Use of personal protective equipment			
Dealing with violent clients			Comments
Working alone procedures			
Emergency procedures (list them here):			

Completion of this form is not a requirement under the OHS legislation and does not indicate competency of workers. It may be used as a record that training has occurred.

Surrent to September 2008

Appendix F: Sample Record of Training

Company Name		
Location		
Type of Training		-9
Date	Printed Name	Signature
		7
		4
		Q
	.(7)	

current to september 2008

Appendix G: Sample Incident Reporting and Investigation Form

Use this report to record the results of your Incident	investigation.
	O-
Name of Worker	-00
Position	Department
Location of Incident	3
Date of Incident	Time am/pm
Type of Incident: Near Miss Minor Injury Serio	us Injury
Date Incident Reported	Time am/pm
Reported to	
Nature of Injury (if any)	
Witnesses	
Damage to Equipment or Property	
Description of incident	

Identified causes (direct, indirect, root)	
	2008
Recommended Preventative Action:	
To be completed by:	Date:
Follow-up	
Ву:	Date of follow-up:
Name of Down Investigation	
Name of Person Investigating	
Signature	

Appendix H: Sample First Aid Record Form

First Aid Record	
Date of Injury or Illness (dd/mm/yyyy)	Time am/pm
Reported to First Aider (dd/mm/yyyy)	Time am/pm
Full name of Injured or III Worker	0,9
Description of the Injury or Illness	
Description of where the injury or illness occu	rred/began
	×O'
Cause of the Injury or Illness	600
First Aid Provided? Yes [(If yes, complete	e the rest of this page) No \square
Name of First Aider)
First Aid Qualifications	
Emergency First Aider	Emergency Medical Technician
Standard First Aider	Emergency Medical Technician – Ambulance
Advanced First Aider	Emergency Medical Technician
Registered Nurse	Emergency Medical Responder
First Aid Provided	

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Keep this record for at least 3 years from the date of injury or illness.

Surrent to September 2008

Appendix I: Sample Emergency Response Plan

Company Name:		
ocation:		
POTENTIAL EMERGENCIES (Based on Hazard Assessment)	The following are identified potention	al emergencies:
EMERGENCY PROCEDURES	In the event of an emergency (type affecting the work site, the (designor decisions and the appropriate key)	ated person) makes the following
LOCATION OF EMERGENCY EQUIPMENT	Emergency equipment is located at:	
WORKERS TRAINED IN THE USE OF EMERGENCY EQUIPMENT (List of names of workers trained)	1	
EMERGENCY RESPONSE TRAINING REQUIREMENTS	Type of Training	Frequency

LOCATION AND USE OF EMERGENCY FACILITIES	The nearest emergency services are located: Fire station: Ambulance: Police: Hospital: Other:
FIRE PROTECTION REQUIREMENTS	are located:
ALARM AND EMERGENCY COMMUNICATION REQUIREMENTS	look /
PROCEDURES FOR RESCUE	First Aid Supplies are located at: First Aid Kit Type: Other: AED First Aiders are: Name: Location: Shiff or hours of work: Transportation for ill or injured workers is by: Call: In case of (type of emergency/evacuation)
AND EVACUATION	in case of type of emergency/evaceanom
DESIGNATED RESCUE AND EVACUATION WORKERS	The following workers are trained in rescue and evacuation: Name: Location: Location:
Completed On	
Signed	

Appendix J: Sample Workplace Violence Policy and Procedures

The management of <u>Company Name</u> recognizes the potential for workplace violence and other aggressive behavior directed at our employees. We will not tolerate behavior from anyone that intimidates, threatens, harasses, abuses, injures or otherwise victimizes our employees and will take whatever step are appropriate to protect our employees from the potential hazards associated with workplace violence. We are committed to providing our employees with an appropriate level of protection from the hazards associated with workplace violence.
Management Responsibilities
Management will:
 Inform employees if they are working in an area where there is a potential for violence and identify any risks that are specific to that area. Ensure that appropriate procedures are in place to minimize the risk to our employees from violence. Ensure that employees are trained in recognizing and responding to situations involving workplace violence. Ensure that every reported incident of workplace violence is investigated and potential areas for improvement are identified.
Employee Responsibilities
 Employees of Company Name are required to be familiar with and follow the procedures that are in place to protect them from workplace violence. All employees must participate in the instruction of workplace violence prevention. Employees are required to immediately report all incidents of workplace violence to their supervisor or (identify alternate)
No employee can be penalized, reprimanded or in any way criticized when acting in good faith while following the procedures for addressing situations involving
workplace violence.
Signature of company owner/president Date

Procedures

In addition to a policy, procedures should be developed and communicated to all workers. The procedures should address the following areas:

- · How potential hazards will be identified and communicated to staff
- · How to respond to workplace violence
- · How to report workplace violence
- · How to investigate and document incidents of workplace violence
- · The support available for victims of workplace violence
- · Training of workers

Feedback Form

Alberta Employment and Immigration (AEI) would like your feedback on the *Occupational Health and Safety Guide for Physician's Offices*.

Please send the completed form to:

Sharon L. Chadwick, Senior Manager WHS Program Planning, Research and Audit Workplace Innovation and Continuous Improvement 8th Floor, 10808-99 Avenue Edmonton, Alberta T5K 0G5 or Fax to: 1-780-422-0014

Date survey completed The following questions will help us determine the usefulness of the content available in the guide. Please choose one answer.							
	Strongly Agree	Somewhat Agree	Somewhat Disagree	Strongly Disagree	No Opinion		
a) The information was easy to find.							
b) The information was easy to understand.							
c) The information was useful.							
d) I will be able to apply this information to my workplace.		Q -					
e) There was enough information provided.	CB						
f) What information, if any, would you like to s g) What information, if any, should be deleted							
h) What information was most useful to you?							
i) Did you or will you use the information in the Yes. No – Why not?	j) Did you use the sample forms provided in the document? Yes. No – Why not?						
k) Would you recommend this document to o' Yes. No – Why not?	thers?						

Question	Yes	No			
1. Were you aware of your responsibilities under existing Occupational Health and Safety legislation as:					
i) A worker?					
ii) An employer?					
iii) A person directing the work of others?					
2. Will you advise your staff/employees to review this guide?					
If no: why not?		9			
3. Do you anticipate making any changes to your practice as a result of reviewing this guide?					
If yes: what?	10	,			
If no: why not?	3)				
4. Would you prefer to access this information online or in print format?					
5. Do you have any suggestions for changes or additions to this guide?					
5. Do you have any suggestions for changes or additions to this guide?					
6. Other comments: a) Which type of setting do you work/practice in? (select all that apply): Physician's Private Practice Office Non-hospital surgical facility Diagnostic Laboratory Diagnostic Imaging Medical Clinic Other diagnostic lab facility – pleas After hours and walk-in clinic Other:	se specify:				
b) How many workers are there at your work site? Less than 10 10 – 19 20 – 39					
c) What is your current occupation or position? (select all that apply): Physician Registered Nurse Diagnostic imaging technician Diagnostic imaging technician Other: Other- Other – please specify:					
d) If you would like a response to your comments please provide the following info	ormation:				
Contact E-mail: Contact Phone Number:					
If you have any questions or comments about the feedback form, please contact Sharon L. Chadwick at 780-422-8185 or by e-mail at sharon Lchadwick@aoy.ab.ca					

Sharon L. Chadwick at 780-422-8185 or by e-mail at sharon.l.chadwick@gov.ab.ca.

Thank you for taking the time to provide us with your feedback. Alberta Employment and Immigration values everyone's opinion.



Contact us:

Province-Wide Contact Centre

Edmonton & surrounding area:

780-415-8690

Throughout Alberta:

1-866-415-8690

Deaf or hearing impaired

In Edmonton: 780-427-9999 or 1-800-232-7215 throughout Alberta

Web Site

www.worksafely.org

Getting copies of OHS Act, Regulation & Code:

Queen's Printer

www.qp.gov.ab.ca Edmonton: 780-427-4952

Workplace Health and Safety

www.whs.gov.ab.ca/whs-legislation

Call any Government of Alberta office toll-free

Dial 310-0000, then the area code and telephone number you want to reach

BP004 | September 2008

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