

# Conducting a Risk Assessment/Exposure Control Plan (ECP) for COVID-19

MAY 28 - BCFED HEALTH & SAFETY CENTRE

Thank you for joining us on the webinar: Conducting a Risk Assessment/Exposure Control Plan (ECP) for COVID-19 hosted by the BCFED HEALTH & SAFETY CENTRE.

This outline is being provided to give participants an overview of the presentation and a resource to share with others. The content covers the various authorities supporting health and safety during the COVID-19 pandemic, how to conduct a **risk assessment** and the components of an exposure control plan (ECP).

## OVERVIEW

Where workers have occupational exposure to the virus, employers must develop an ECP which includes conducting a risk assessment and implementing control measures.

### Biological Agents

- The virus is a biological agent, and several regulations are applicable.
- [Part 6.34 of the OHSR speaks to exposure control plans for biological agents.](#)
- [For workers in federally regulated industries, COHSR Part XIX \(19\) applies to biological agents such as SARS-CoV-2.](#)
- Regardless of jurisdiction, all workplaces with occupational exposure to the virus must have an exposure control plan to address it.

## RISK ASSESSMENTS

Risk is the likelihood that the hazard could cause injury, illness/disease, or death. A risk assessment is the foundation of an exposure control plan. The risk assessment must be documented and will be a part of your ECP.

- Risk assessments must be conducted by a qualified person.
- A qualified person is defined as “being knowledgeable of the work, the hazards involved and the means to control the hazard, by reason of education, training, experience or a combination thereof”.
- To determine the level of risk, consider consequence, exposure, and probability of exposure to each task.
- The risk should be assessed first without and then with the consideration of control measures.
- The joint occupational health and safety committee must participate in conducting a risk assessment.
- After implementing control measures it is necessary to reevaluate that the risk has been eliminated or minimized.

### Consider the following points:

What are the responsibilities of the employer, supervisors, and workers?

- **Workplaces** – Where will workers be exposed to the virus? Does the employer have multiple workplaces? Each workplace may need a separate ECP depending on the variables between the work locations.
- **Job Classification** – How will risk of exposure be prevented? Some job classifications, by the very nature of the work being done, may have a higher or lower risk of exposure than some other workers at the same work site.
- **Job Tasks** – How will workers be exposed to the virus? What are the modes of transmission? Some tasks done periodically within a worker's day may have risk factors associated only to that task which must be evaluated separately.
- **Individual workers** – Who will be exposed to the virus? What is the level of risk for each worker who may be exposed? Older persons and those with underlying medical conditions may be at a higher risk of serious illness if exposed.

### Potential for Exposure

- The precautionary principle should be used any time workers may come in to contact with body fluids.
- Assume the presence of pathogens in all body fluids such as feces, blood, urine, and saliva.

## CONTROL MEASURES

Once an inspection or risk assessment has identified hazards associated with COVID-19, control measures must be implemented in the workplace to prevent exposure. When selecting a safeguard or a combination of safeguards, always strive to eliminate, and if not practicable, to mitigate the risk by implementing engineering, administrative or PPE controls. Choose a less effective safeguard only when more effective solutions are impracticable. Controls should be developed in consultation with your joint health and safety committee or worker representative and continuously monitored to ensure they are providing the best level of protection to workers. Sometimes, the introduction of control measures can bring forth new, unexpected hazards.

### Examples of Engineering Control:

- Physical barriers such as plexiglass
- Barriers to isolate persons
- Barriers to restrict the flow of people
- Negative pressure rooms (generally in health care settings)

- Systems to restrict public access

### Examples of Administrative Controls:

- Preventing workers from coming to work if ill (setting clear parameters)
- Safe Work Procedures – including hand washing
- Implementing personal risk assessments
- Implementing an enhanced cleaning schedule with effective cleaning products
- Physical distancing (PHO Order)

### Examples of Personal Protective Equipment:

- Gloves, gowns, respirators, and masks are often suggested as PPE for this hazard.
- It is important to note that different masks address different hazards.
- Workers must be trained on the appropriate use of PPE.
- Improper use (such as when donning and doffing) increases the likelihood of causing infection.

## EXPOSURE CONTROL PLAN

An ECP is a document that includes the risk assessment and explains how workers will be protected from hazardous exposures. This process must involve workers, supervisors, and joint health and safety committees and/or worker representatives. Assessments of the workplace should continue after operations resume to ensure risks are identified and managed.

A formal [exposure control plan](#) will help employers demonstrate due diligence. It is a document used to record the risk factors and control measures. The exposure control plan must incorporate:

- A statement of purpose and responsibilities
- Risk identification, assessment, and control
- Education and training
- Written work procedures, when required
- Hygiene facilities and decontamination facilities, when required
- Health monitoring, when required
- Documentation

An exposure control plan must also cover:

### Modes of Transmission:

The most common and currently recognized routes of transmission include:

- Airborne – airborne droplets from sneezes or coughs
- Contact – when one touches a contaminated surface and then touches their face allowing for exposure
- Aerosolized - generally in health care settings & associated with aerosol-generating procedures

### Controls and Precautions (for example):

- Laundry
- Housekeeping

- Laboratory or other samples

### Documentation:

- Worker training records
- Workers who have been exposed in the workplace

### Training Requirements:

- All workers and the supervisors must be trained in the modes of transmission for the virus and the control measures implemented, as documented in the ECP.
- Training must include information on modes of transmission, tasks where exposure may take place and control measures including appropriate PPE.
- Must be appropriate for the workers meeting the literacy, language, and education levels of workers
- It must be provided by a knowledgeable person
- Keep training records for at least 3 years.
- Training records are not confidential.
- If the ECP changes, the training must be updated.

### Records of Exposure:

If workers are exposed, records of exposures must be maintained by the employer. The records may include:

- First aid records (confidential)
- Employer Incident Investigation Reports
- Claims information if applicable
- Records of worker reports of unsafe conditions
- Workplace inspections documenting possible exposures
- Records of workers refusal of unsafe work

In BC, the Exposure Control Plan must be reviewed at least annually and updated as necessary by the employer, *in consultation with the joint committee or worker health and safety representative*, as applicable.

## ROLE OF AUTHORITIES

All parties are working together to lower the risk of exposure to the virus and to support positive outcomes.

### Provincial Health Officer – Orders, notices, and guidance

<https://www2.gov.bc.ca/gov/content/health/about-bc-s-health-care-system/office-of-the-provincial-health-officer/current-health-topics/covid-19-novel-coronavirus>

### BC Centre for Disease Control (BCCDC) – Information and advice

<http://www.bccdc.ca/health-info/diseases-conditions/covid-19>

### Provincial Government – Emergency Program Act

[http://www.bclaws.ca/Recon/document/ID/free-side/00\\_96111\\_01](http://www.bclaws.ca/Recon/document/ID/free-side/00_96111_01)

### Federal Government – Quarantine Act

<https://www.canada.ca/en/public-health/corporate/mantdate/about-agency/acts-regulations/list-acts-regulations.html>

### Chief Public Health Officer of Canada

<https://www.canada.ca/en/public-health/corporate/organizational-structure/canada-chief-public-health-officer.html>

### WorkSafeBC – Regulatory body for occupational health and safety in BC

<https://www.worksafebc.com/>

### Employment and Social Development Canada – Regulator for federally regulated workplaces

<https://www.canada.ca/en/employment-social-development.html>

## RESOURCES

### Workers Compensation Act and Occupational Health and Safety Regulation

<https://www.worksafebc.com/en/law-policy/occupational-health-safety/searchable-ohs-regulation>

### Canada Labour Code

<https://laws-lois.justice.gc.ca/eng/acts/l-2/FullText.html#h-46>

### WSBC exposure control plan for biological agents and first aid attendants

<https://www.worksafebc.com/en/resources/health-safety/exposure-control-plans/exposure-control-plan-for-infectious-disease-for-occupational-first-aid-attendants?lang=en>

### BCFED COVID-19 resource page

<https://bcfed.ca/news/statements/resources-workers-during-covid-19>

### WSBC guide for employers on preventing exposure to COVID-19

<https://www.worksafebc.com/en/resources/about-us/guides/preventing-exposure-to-covid-19-in-the-workplace?lang=en>

### WSBC eBook “Controlling Exposure: Protecting Workers from Infectious Disease”

<https://www.worksafebc.com/en/resources/health-safety/books-guides/controlling-exposure-protecting-workers-from-infectious-disease?lang=en>

### Health Canada’s list of sanitizers and disinfectants approved for use against the virus

<https://www.canada.ca/en/health-canada/services/drugs-health-products/disinfectants/covid-19.html>

## CONTACT THE BCFED HEALTH & SAFETY CENTRE:

### Email:

[ohsadmin@bcfed.ca](mailto:ohsadmin@bcfed.ca)

### Website:

<https://www.healthandsafetybc.ca/about/contact/>

We hope that you stay healthy and safe during this crisis and we look forward to staying connected with you.



## FOR MORE INFORMATION:

**BCFED Health & Safety Centre: 1-888-223-5669**

**WorkSafeBC: 1-888-621-SAFE**

**ESDC Labour Program: 1-800-641-4049**

If you are a member of a union in BC, contact your union local.