

# Contents

<b>Foreword by the chief executive</b>	<b>2</b>
<b>1 General health and safety policy statement</b>	<b>3</b>
a Our responsibilities	4
b Health and safety management	5
<b>2 Organisation for health and safety</b>	
a Individual responsibilities	6
b Health and safety policy-makers	7
c Health and safety planners	8
d Site supervisors and supervisors	9
e Employees	10
f The corporate Safety, Health and Wellbeing (SHAW) service team	12
g Health and safety co-ordinators and safety representatives	13
<b>3 Health and safety arrangements</b>	
a Safety management standards (SMSs)	14
b Local arrangements and procedures	15
<b>4 Measuring performance</b>	<b>16</b>
<b>5 Auditing and periodic status review</b>	<b>17</b>
a Auditing	
b Periodic status review	
<b>6 Communication</b>	<b>18</b>

## **EcoLogic Spray Foam Insulation**

### **Corporate health and safety policy**

#### **Foreword by the chief executive**

This policy underlines our recognition that health and safety is equally important to our other aims, and we recognize our legal responsibilities.

This policy shows our duty of care to our employees and citizens to provide services in a way that will not put them at risk.

The basis of our health and safety policy is to develop a climate in which a positive health and safety culture can develop. We will achieve this by:

- maintaining effective systems of **communication** on health and safety matters;
- making sure we are able to provide health and safety support, advice, training, recruitment, placement procedures and health surveillance;
- maintaining **control** by setting clear health and safety standards and providing strong leadership; and
- securing **co-operation** between individuals, safety representatives, employee representatives and working groups.

We must all play our part in achieving the highest possible standards of health and safety and rigorously comply with all aspects of this policy as it highlights our vision for health and safety and everyone's role in achieving this.

You must read this document with the relevant topic-based safety management standard (SMS), and your service area's health and safety local arrangements and procedures.

**Mark Nelson**  
President

## **Section 1: General health and safety policy statement**

We accept our legal responsibilities as an employer and will aim to protect the health, safety and welfare of our employees and others affected by our activities (for example, members of the public, including clients, visitors, contractors and so on). We will do this by assessing possible risks and introducing suitable and adequate measures to control those risks.

We are committed to keeping to all relevant health and safety laws. However, we realize that merely keeping to the law is a minimum requirement, and we will aim to achieve higher standards. We do this through a series of safety management standards (SMSs)

All employees, not just managers, are responsible for keeping to our health and safety policy.

This leads to us continuously making our workplace a safer environment with the following extra benefits.

- Improving the quality of services.
- Reducing losses (including accidents) and liabilities.
- Encouraging all employees to think about how they can do their jobs more safely.
- Making continuous improvements in health and safety performance.

When losses (such as accidents) happen, this means that managers have failed to maintain control, and is not necessarily the responsibility of individual employees, who are our most important resource.

**Health and safety is the concern of everyone within the company.**

**The success of any safety management system in reducing loss (including accidents) depends on the good sense and health and safety consciousness of everyone at work.**

**We expect all our employees to recognise their responsibility as set out in this policy and their service area's local arrangements and procedures.**

## **a Our responsibilities**

We will take all reasonable steps to effectively maintain and improve how we manage health and safety risks by:

- providing a safe place of work, with safe entrances and exits at each workplace;
- providing a safe and healthy working environment;
- providing adequate support and facilities so health and safety representatives and other employee representatives can carry out their functions in line with the relevant law;
- providing safe plant, equipment and machinery;
- providing arrangements so items and substances at work can be used, handled, stored and transported safely;
- providing safe systems of working;
- providing adequate welfare facilities;
- providing information, instruction and training, as necessary, at all levels (including nonemployees and contractors) to make sure they are competent, avoid ill health or injury at work, and increase awareness of employees' legal and moral obligations towards health and safety;
- providing suitable and adequate assessment of the health and safety risks to employees (while at work) and non-employees (arising out of our work activities);
- making and delivering arrangements so we can plan, organise, control, monitor and review preventive and protective measures effectively;
- helping employees to contribute positively to their own safety at work;
- providing adequate supervision of activities to make sure health and safety standards are met; and
- publishing each year the results of our health and safety performance.

## **b Health and safety management**

In line with our operating as a crew, health, safety and welfare management is the responsibility of each crew. This will allow issues to be tackled at local level, wherever possible. However, although we do this for practical purposes, regional managers and the chief executive still have overall responsibility for health and safety. We also name a safety officer to highlight awareness of health and safety.

EcoLogic Spray Foam will produce a health and safety action plan each year as an integral part of the service planning process. Regional managers, the chief executive and the safety officer will monitor the system to make sure that it continues to be effective and appropriate.

The main role of the safety officer is to:

- make sure that health and safety is one of the most important considerations in developing policy and planning resources;
- monitor and review the effectiveness of health and safety strategies across the company; and
- make sure that health and safety is properly considered when buying in services and employing contractors.

Site managers or crew bosses play an important role in managing and supervising health and safety and in maintaining and improving health and safety standards.

Without taking anything away from the main responsibility of managers and supervisors to make sure there are safe conditions at work, we will provide (through the corporate Safety, Health and Wellbeing (SHAW) service team) competent technical advice on health and safety matters to help site managers in their task. Section 2 of this document shows how health and safety responsibilities are organized.

We will make sure that we provide occupational health facilities and identify and control work related ill health. We will also make sure that we monitor the work environment to encourage co-operation, partnership and joint consultation with health and safety representatives who have been appointed developers, project management and other employee representatives.

Effective communication of the health and safety policy is vitally important if it is to become more than words on paper. We will provide a summary of this document to all employees before they start work with us and make it available to existing employees through the corporate health and safety pages on our internet site.

Health and safety will be a regular item on all team meetings – to make sure we all receive, and can discuss, information on any changes to the safety management system. We will review this policy every two years.

## **Section 2: Organization for health and safety**

### **a Individual responsibilities**

All employees have a legal responsibility to meet the statutory requirements of the Occupational Health and Safety Act (Ontario); The Occupational Health and Safety (OHS) Regulation (British Columbia) and the Manitoba Workplace Safety and Health Act (Manitoba). At all levels of the organization, our people will be:

- responsible for the safety and wellbeing of themselves, those people they manage and the people they work for;
- aware of their responsibility for health and safety issues and their effects on people within the activities they control; and
- aware of the influence that their action or inaction can have on the effectiveness of our safety management standards (see section 3 for a definition of SMSs).

The safety officer is responsible for making sure that appropriate programs meet relevant national legislation and the corporate standards. The following people are responsible for health and safety. Individual safety management standards (SMS) will use these terms when referring to people.

- **Policy-makers**

They develop and are responsible for policy at a strategic level. They preserve, develop, promote and maintain our health and safety management system. Policy-makers also make sure that we take account of health and safety matters when we make organizational decisions.  
(Some policy-makers may also have planner and implementer duties).

- **Planners**

(Regional Managers)

They develop detailed local arrangements and procedures to achieve our corporate aims. They also contribute to our health and safety management system, by dealing with management arrangements for identifying, eliminating and controlling hazards and risks within their area of concern.  
(All planners also have implementer duties).

- **Implementers**

(Site Supervisors)

They make sure that the workplace precautions and systems for controlling risk are in place and are put into practice.

- **Assisters**

They have the status and competence to advise management and employees. They will normally be a part of the installation crew and service team.

## **b Health and safety policy-makers**

Health and safety policy-makers will preserve, develop and maintain our health and safety management system by:

- identifying a structure for planning, measuring performance, reviewing performance, auditing and monitoring the health and safety management systems;
- developing strategies to put policy into practice and including these in general business activity;
- making sure that responsibilities for safety, health and welfare are properly passed on, understood and carried out;
- agreeing plans for improvement and reviewing the progress of the health and safety management system and the corporate health and safety action plan;
- making sure we fully consider the resources we need across service areas for putting our health and safety management system into practice;
- making sure that there is consultation between safety officers and management teams;
- making sure that our health and safety performance is audited and that we take appropriate action to put things right;
- monitoring how service areas' safety action plans are put into practice, to deliver the corporate plan;
- making sure that service areas produce in-depth local arrangements that are in line with the corporate context, but which are specific to service areas, and that they are regularly monitored and reviewed and brought to the attention of all affected employees;
- where a work activity presents a serious and imminent risk of injury, making sure that the work activity stops until the risk is removed or reduced to an acceptable level (whether or not that activity is carried out by our employees, contractors or others); and
- making sure that standards are clearly defined within a topic-based SMS to make sure we act within the law and promote best health and safety practice.

### **c Health and safety planners**

Health and safety planners will contribute to our health and safety management system by dealing with local site arrangements for identifying, getting rid of or controlling hazards and risks within their area of responsibility. (Hazards are those things with the potential to cause harm. Risk is the likelihood of someone being harmed). They will do this by:

- discussing with the client the safety precautions we adhere to, in order to show their commitment to health and safety within their service area;
- making sure that health and safety responsibilities are properly passed on, understood and carried out by employees within their service area;
- telling the policy-makers what resources (including financial) are needed to meet their service area's obligations for health and safety matters, including providing equipment, clothing and training;
- setting up local site arrangements, risk-assessment programmes, risk-control systems, workplace precautions and associated performance standards, to make sure that they are monitored, reviewed and updated regularly and brought to the attention of employees;
- supporting the policy-makers in promoting our health and safety management system;
- asking for advice from the SHAW service team, or your service safety adviser, to make sure we effectively plan and put into practice the SMS, and making sure they are aware of relevant health and safety matters;
- monitoring how effectively their service area's local arrangements are put into practice, making sure that it reflects the aims of this policy and the yearly health and safety action plan;
- when making decisions on behalf of their service area, making sure that any relevant health, safety and welfare issues are dealt with fully;
- making sure that their service area has a suitably-trained co-ordinator, designated to represent their service area at corporate level on health and safety matters; and
- helping to set up health and safety committees to promote the involvement of employees in all aspects of health and safety.

## **d Site supervisors**

All crew managers and supervisors are responsible for managing health and safety on their worksites and within their crews areas of responsibility. Support is available from the local health and safety co-ordinator and the corporate SHAW service team (although site supervisors will be ultimately responsible). We will give individual managers and site supervisors authority to put identified action plans into practice within the general limits of their authority. In particular, they will:

- make sure that all employees under their control are familiar with the relevant SMS and put it into practice (they should discuss any areas of concern with the corporate SHAW service team);
- set up and maintain within their department safe, healthy working conditions;
- make sure there are safe systems of working, as set out in the SMS and local arrangements;
- show the commitment and motivation to achieve safe working attitudes and actions;
- reduce risk as far as possible through risk assessment, taking precautions to get rid of hazards, reduce risks or protect other people where necessary;
- audit and monitor (through observation, direct supportive supervision and 'managing by walking about') safe working practices and procedures (they should do this every day);
- make sure that procedures and training programmes are set up and maintained for all employees;
- make sure that job training is carried out by competent people;
- make sure that procedures are included when designing, buying and using all new equipment;
- make sure that new, reviewed or changed processes and services will be assessed for risks (preferably before they are put into practice);
- make sure that we investigate and follow up all accidents and incidents under the service area's control so that we can get rid of or control basic causes (this should help prevent them happening again);
- set yearly aims within their area to improve health and safety, record them as part of the service planning process and review performance against these aims;
- make sure that contractors' and other people's activities (for example, employees from other service areas) in the area or department are monitored to make sure they meet the relevant SMS;
- carry out safety inspections (including housekeeping) to identify hazards; and
- make sure that all employees, including safety representatives, are able to carry out their responsibilities, and encourage them to work with managers to promote an attitude of safe working.

## e Employees

Employees have an important role to play in effective health and safety management. Employees are crucial to maintaining and improving health and safety standards, so all employees will:

- take reasonable care for their health and safety and that of other people who may be affected by what they do (or neglect to do) while at work;
- co-operate with us to meet any health and safety legal duty or need;
- not intentionally or recklessly interfere with, or misuse, anything provided in the interests of health, safety and welfare (for example, protective clothing, first-aid equipment and machinery guards);
- have a particular duty to other people to protect their safety, and make sure that they don't use any method of work that could be dangerous to themselves or members of the public;
- tell their site supervisor, without delay, about any work situation that might present a serious and imminent danger to themselves or others, or about any other problems in health and safety arrangements;
- always follow relevant procedures to avoid health and safety risks, and consult their site supervisor on any areas of concern;
- make sure they know and follow the guidance given in risk assessments, and protective measures needed when working (such as clothing or equipment);
- maintain tools and equipment in good condition and report any risk or problem to their site supervisor (employees must use equipment or materials for their proper purpose only);
- follow all instructions (whether spoken or in writing) given to protect their safety and the safety of others;
- be appropriately dressed for the particular working conditions and activities;
- behave appropriately at all times in the workplace;
- report all accidents, near misses, incidents of violence, diseases and dangerous events (whether or not someone is injured), as well as unsafe conditions, methods of work, practices, tools, plant, premises or equipment, to their site supervisor, their safety representative, or the service safety officer where appropriate;
- help fully in the reporting and investigating any accident, near miss, dangerous event or incident of violence;
- make suggestions to improve health and safety;
- go on all training courses designed to further the needs of health and safety, as necessary;
- make sure they understand all relevant processes, materials and substances, and get advice from their site supervisor if they're not sure;

- make themselves aware of the fire evacuation procedure for their premises and the position of fire exits, alarms and equipment, and make sure that escape routes and exits are not blocked;
- when working outside the direct control of their immediate supervisor, identify (and report to) the person controlling the site so they understand site safety rules or special requirements (for example, protective clothing); and
- not take any action or get involved in any activity, while at work, that would harm the health and safety of any other employee, visitor or person living in the borough.

All employees have a duty to co-operate at all times to help us meet these aims. We insist on safe working methods. Employees who ignore safety rules and procedures may face an investigation leading to disciplinary action, up to and including dismissal.

## **f The corporate Safety, Health and Wellbeing (SHAW) service team**

They have the necessary status and competence to advise management and employees, and will:

- write, publish and review the health and safety management standards, draft a corporate health and safety action plan for approval by the policy-makers, set realistic standards and targets, decide on priorities and set up adequate corporate systems and performance standards;
- review our performance and audit our health and safety management system;
- help with, monitor and develop our health and safety policy by consulting managers and safety representatives;
- use executive powers (on behalf of policy-makers), which may include stopping any work activities, where there is a serious and imminent risk of injury, and set appropriate health and safety management standards to make sure we act within the law;
- report to the Health and Safety Policy-Makers and planners as necessary to .
- develop local health and safety arrangements and procedures to meet the relevant topic safety standard;
- promote a positive health and safety culture;
- assist managers to assess risks and identify controls;
- act as a focal point for health and safety issues that are relevant across all service areas;
- advise on appropriate health and safety training for managers and supervisors or other employees, as necessary, to make sure we act within the law; and
- work closely with the health and safety planners, and report to their site supervisors on matters concerning health and safety.
- comment on policy development and review when appointed to be a member of the various safety committees

## **h Health & safety committees**

The prime function of the safety committee structure is to keep under review the measures taken to ensure the health, safety and welfare of employees working within the company or any others who could be affected.

Committees will promote co-operation between the employer and employees in instigating, developing and carrying out appropriate measures to include:

- reporting to, and receiving reports from, front line crews and policy makers and planners.
- co-ordinating and progressing measures to ensure the health, safety and welfare of staff and other persons affected by the operations of the company;
- studying accidents, accident trends, violent incidents, notifiable disease statistics and trends, so that relevant reports can be submitted to the corporate health and safety committee or management, which might include recommendations for corrective action;
- considering any reports from Inspectors or Regulators as they impact the company;
- receiving reports from safety representatives;
- the examination of safety audit reports;
- assisting the development of SMSs;
- monitoring the effectiveness of the employee safety training;
- carrying out health and safety inspections;
- monitoring the introduction on new technologies which may have health and safety consequences for employees and others; and
- monitoring the implementation of risk control measures identified by risk assessments.

### **Section 3: Health and safety arrangements**

This corporate policy sets out a general framework for organizing health and safety across the company. To help us manage the health and safety risks and issues within the organization, we have developed a series of topic-based safety management standards.

#### **a Safety management standards (SMSs)**

The SMSs are based on the relevant Health and Safety legislation in regions in which we conduct business; the statutory requirements of the Occupational Health and Safety Act (Ontario); The Occupational Health and Safety (OHS) Regulation (British Columbia) and the Manitoba Workplace Safety and Health Act (Manitoba).. The aim of the SMSs is to define the minimum knowledge needed to meet legal and corporate standards. They are written independently by the SHAW team under the delegated authority of the policy-makers.

The main areas are:

- the definition of individual responsibilities and corporate standards;
- standard documents and training;
- regular compliance audits; and
- a review of the system.

These management standards are based on the principle of getting rid of the hazard as the first step in controlling the risk. We give more detailed guidance on topic standards and relevant law in each SMS. The topic standards cover the following main health and safety topics.

One of the main methods for making sure that each topic management standard is effective is the audit process. Audits allow us to review our performance on each topic SMS each year and to make sure we continue to improve. The corporate SHAW service team prepares a schedule of audit dates each year.

Planners and Site Supervisors are responsible for all aspects of health and safety in their service area. Employees should first discuss health and safety topics with their site supervisor.

We maintain a library of SMSs and relevant legislation and other national standards. All relevant staff can access this information by using our intranet site. This format means we can also control documents (documents become uncontrolled when they are printed).

At times, we may need specialist outside advice or for specialist safety training). These specialists may be checked and approved by the corporate SHAW service team before being added to our approved list of contractors and suppliers.

### **b Local arrangements and procedures**

Planners must develop local arrangements for delivering effective health and safety management. Local arrangements will detail the roles, responsibilities and authorities of local (named) individuals who will co-ordinate, manage and carry out some of the local procedures.

In all cases the local arrangements will 'translate' the SMSs into local, specific and deliverable instructions to make sure we meet the corporate standard.

The health or safety officers of the SHAW service team will work together with the regional planners in developing local arrangements.

## Section 4: Measuring performance

As a way of measuring our performance and whether we meet our targets, we will measure the performance of the topic-based SMSs as follows.

**'Proactive measures'** of performance that monitor whether we are meeting targets, for example:

- regular documented management audits;
- site inspections at set times;
- the results any SMS auditing activity;
- the number of areas within a service area with a known risk;
- the number of people exposed to a risk;
- new work projects assessed as having no relevant risk;
- the frequency of surveys and reports from safety committees;
- the frequency of, and attendance at, safety meetings; and
- the results of investigations by safety representatives.

We expect site supervisors to monitor whether we are meeting targets through direct supportive supervision and 'managing by walking about'.

**'Reactive measures'** such as:

- staff having to visit occupational health (that can reasonably be considered to be caused by exposure to the risk being measured);
- civil claims against us; and
- the number of reports of near misses, incidences of illness or accidents.

We expect site supervisors to monitor whether we are meeting the SMSs by reviewing accident investigations and sharing findings, reviewing near-miss reports and monitoring areas and teams after incidents.

Identifying the basic cause is essential for all safety management systems, as it highlights any problems and any improvement plans that we can put into practice.

## **Section 5: Auditing and periodic status review**

### **a Auditing**

We will regularly audit service areas' performance in individual topic-based SMSs. These audits will be carried out by competent people who are as independent as possible from the service area being audited (and may be carried out by members of the corporate SHAW service team). Or, different service areas could audit themselves.

We will report audit scores promptly to all relevant employees, and make adjustments to safety action plans.

Members of the SHAW service team are lead auditors registered with the International Register of Certified Auditors (IRCA) or licensed by the Royal Society for the Prevention of Accidents (RoSPA) to deliver their Quality Safety Audit programme (QSA). This makes sure there is a high level of independence and quality assurance in the corporate-level auditing programme.

### **b Periodic status review**

Every two years, we will review the status of each SMS (or more often in response to legislative changes). Formal SMS reviews will include:

- an overall reduction of risks;
- the overall performance of the SMSs;
- the performance of individual parts of the SMSs;
- the findings of the audit;
- basic changes in organisational structure, new processes or new technology;
- external regulatory or guidance factors (for example, legislation or British Standards); and
- the results of an independent external audit, if there is one.

The design of this management system allows us to deal with and adapt to internal and external factors. The periodic status review gives us an opportunity to look forward.

We use the information we gain to improve our approach to reduce risk as far as possible and improve business performance. We will use this review process to further develop suitable plans to reduce risks plans at each location within their safety action plans.

## **Section 6: Communication**

As part of our commitment to deliver effective communication to all our employees, we will give new employees a summary of this document when they begin working for us. If our health and safety policy changes, we will immediately tell all managers and employees through payslips, health and safety committees, joint negotiation committees, employee newsletters, staff notice boards, employee briefing meetings, computer networking and so on.

We will maintain a corporate health and safety intranet as a way of communicating corporate safety standards and as a document control system. You can find the health and safety pages from our intranet homepage by clicking on a link called 'Health and Safety'.

**We will make a copy of this corporate health and safety policy available to all employees through the health and safety pages on the intranet or externally via [www.ecologicfoam.com/staff](http://www.ecologicfoam.com/staff)**