**COVID-19 EXPOSURE CONTROL PLAN**

**SAMPLE TEMPLATE**

# Controlling Exposure

**Does my workplace need an exposure control plan specific to COVID-19?**

Formal exposure control plans under [Occupational Health and Safety Regulation 6.34](https://www.worksafebc.com/en/law-policy/occupational-health-safety/searchable-ohs-regulation/ohs-regulation/part-06-substance-specific-requirements#SectionNumber:6.34) are not required for most industries.

Employers that would be expected to have an exposure control plan include those where “occupational exposure” could be reasonably anticipated, such as employers in the health and social service sectors or group homes. In addition, workers employed in other types of communal living settings, such as workers in corrections, would also be expected to have a plan.

Employers in general industry, such as construction and manufacturing, would not be required to have an exposure control plan but would be required under [section 5.2](https://www.worksafebc.com/en/law-policy/occupational-health-safety/searchable-ohs-regulation/ohs-regulation/part-05-chemical-and-biological-substances#SectionNumber:5.2)  to implement procedures to minimize or eliminate the risk of exposure to biological agents, such as COVID-19. The requirements include a provision for procedures to eliminate or minimize the risk of exposure, communicating precautions to workers, and training supervisors and workers to follow the precautions.

Employers must also undertake regular inspections of the workplace ([section 3.5](https://www.worksafebc.com/en/law-policy/occupational-health-safety/searchable-ohs-regulation/ohs-regulation/part-03-rights-and-responsibilities#SectionNumber:3.5)) and remedy unsafe or harmful conditions without delay ([section 3.9](https://www.worksafebc.com/en/law-policy/occupational-health-safety/searchable-ohs-regulation/ohs-regulation/part-03-rights-and-responsibilities#SectionNumber:3.9)). With respect to potential COVID-19 exposures, employers should ensure that physical distancing is maintained wherever possible, review work procedures to ensure appropriate distancing, identify potential means of transmission on surfaces, and minimize worker contact with those surfaces.

The following exposure control plan template is meant to assist employers with managing potential COVID-19 workplace exposures. The sample plan is a starting point in the development of an acceptable plan that meets the requirements of the OHS Regulation.

**Note:** The exposure control plan is for workplaces that can’t avoid worker contact with potentially infected persons (health care, first-aid attendants, etc.). When used for the rest of the workforce, the exposure control plan is a guideline for best practices and will assist in establishing safe practices for employees to follow.

This template will need to be modified to the specific circumstances at an employer’s worksite. The critical parts of the exposure plan requiring modification and adjustment include:

* Section 1: Revise the responsibilities to suit your worksite.
* Section 2:
  + Perform a site and job specific risk assessment
  + Develop, document or adopt effective mitigation and controls to eliminate the potential for workplace exposures
  + Train all employees in safe practices for risk reduction
  + Maintain and set all housekeeping/sanitizing procedures as a worksite priority
  + Monitor all activity to ensure all employees follow the safe practices
  + Perform health monitoring when required
  + Record all training related to COVID-19 exposure controls.

The sample plan includes various sample procedures and industry shared practices. Review these practices and modify them to suit the site specific circumstances.

Note: The sample procedures, industry-shared practices and associated links were current at the time of the development of this sample plan. Due to the rapidly evolving nature of COVID-19 and information relating to it, all links need to be checked before use. Read the procedures and industry-shared practices carefully to ensure they contain the most current information.

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# Policy & Scope

Company’s (*company and location name*) policy is to ensure that all employees, contractors and visitors at a worksite are protected from occupational exposure to biological agents in a manner that complies with the BC Workers Compensation Act and Occupational Health and Safety Regulation, as well as human rights legislation.

The purpose of the exposure control plan is to eliminate or minimize potential exposures to biological agents (i.e. COVID-19), as well as to reduce the risk of infection should exposure occur. All employees must follow the procedures outlined in this plan to prevent or reduce exposure to biological agents.

## Responsibilities

The company will:

* + Ensure that there are no more than 50 people in the same space in any circumstances.
  + Ensure workers are always able to maintain physical distancing (2 metres / 6 feet apart) while completing their work safely.
  + Reduce in-person meetings and other gatherings and hold shop meetings in open spaces or outside.
  + Increase the number of handwashing stations and post signage that identifies their location. Handwashing stations must be added if none currently exist.
  + Maintain a list of employees who are currently working in each shop and update this list daily.
  + All common areas and surfaces should be cleaned at the end of each day. Examples include washrooms, shared offices, common tables, desks, light switches and door handles.
  + Anyone with COVID-19-like symptoms, such as sore throat, fever, sneezing or coughing, must self-isolate at home for a minimum of 10 days from onset of symptoms, until their symptoms have completely resolved
  + Ensure materials (*i.e. gloves, alcohol-based hand rubs and washing facilities*) and other resources (*i.e. worker training materials*) required to implement the plan are readily available.
  + Develop, implement and document the appropriate site specific control measures.
  + Ensure supervisors, workers, contractors and visitors are educated and trained to an acceptable level of competency.
  + Ensure workers follow all site-specific housekeeping and sanitizing procedures.
  + Ensure workers use appropriate and/or required personal protective equipment (PPE) when required or when physical distancing cannot be maintained.
  + Conduct a periodic review of the plan’s effectiveness including a review of the available control technologies and industry-shared practices to ensure effective use.
  + Maintain all training, competency assessments, work activity monitoring and inspection records.
  + Ensure the most recent copy of the exposure control plan is available to employees, contractors and visitors.

Supervisors will:

* + Ensure workers are adequately instructed on mitigation controls for the exposure hazards at the worksite.
  + Ensure workers use proper respirators (when required), have clean shaven faces (when using respirators) and have been properly fit tested with results recorded.
  + Ensure physical distancing (2 metres/6 feet) is maintained.
  + Direct work in a manner that eliminates or minimizes the risk to workers.
  + Monitor all work activity, document the observations and immediately correct non-conformance. All non-conformance events will be documented.

Employees, Contractors and Visitors will:

* + Maintain social distancing (2 metres/6 feet) at all times.
  + Know the exposure hazards of the workplace.
  + Follow established work procedures as directed by the employer or supervisor.
  + Ask for assistance whenever they are unsure of a safe practice.
  + Use any required PPE as instructed (including having a clean-shaven face if required to use a respirator).
  + Know how and when to report any possible COVID-19 exposures (at work or at home) to your supervisor. *Note: possible exposures occurring off-site need to be reported before coming to the worksite.*
  + Report any unsafe conditions or acts to the supervisor.

# Risk Identification & Assessment

## Site Risk Assessment(s)

|  |  |
| --- | --- |
| **SITE RISK ASSESSMENT FOR COVID-19**  **RISK OF WORKPLACE EXPOSURE** | |
| SITE |  |
| DATE OF ASSESSMENT |  |
| ASSESSMENT TEAM | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ : for the employer  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ : for the employer  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ : for the Worker Representative or JOHSC  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ : for the Worker Representative or JOHSC  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ : Qualified Person |
| OBJECTIVE | To determine all jobs, tasks and procedures for which potential occupational exposure to COVID-19 is anticipated and to evaluate the likelihood that such exposure would occur. |
| OUTCOME | Create a Workplace Exposure Control Plan to mitigate risk of exposure to workers onsite. |
| REVIEW OF WORKPLACE EXPOSURE CONTROL PLAN | *(Daily/Weekly/Monthly)* – Performed by (*position(s)*). |

# Guideline for Risk Assessment for COVID-19 (Adapted from OHSRG 6.34-6)

|  |  |  |  |
| --- | --- | --- | --- |
| **RISK ASSESSMENT FOR COVID-19** | **LOW RISK**  Workers who typically have no contact with people infected with COVID-19 | **MODERATE RISK**  Workers who may be exposed to people from time to time in relatively large, well-ventilated workplaces. | **HIGH RISK**  Workers who may have contact with infected patients, or with infected people small, poorly ventilated workplaces. |
| **HAND HYGIENE** | Yes – washing with soap and water, using an alcohol-based rub or using disinfecting  hand wipes) | Yes – washing with soap and water, using an alcohol-based rub or using disinfecting  hand wipes) | Yes – washing with soap and water, using an alcohol-based rub or using disinfecting  hand wipes) |
| **DISPOSABLE GLOVES** | Not Required | Not Required  (unless handling contaminated objects on a regular basis) | Yes – in some cases (i.e. when working directly with COVID-19 patients) |
| **APRONS, GOWNS OR SIMILAR BODY PROTECTION** | Not Required | Not Required | Yes – in some cases (i.e. when working directly with COVID-19 patients) |
| **EYE PROTECTION – GOGGLES OR FACE SHIELD** | Not Required | Not Required | Yes – in some cases (i.e. when working directly with COVID-19 patients) |
| **AIRWAY PROTECTION – RESPIRATORS** | Not Required | Not Required (unless likely to be exposed to coughing and sneezing) | Yes – minimum N95 respirator or equivalent |

## Qualified Person

Section 6.34(b) of the *Regulation* requires that the risk assessment be conducted by a qualified person to determine the potential for occupational exposure by any route of transmission. Under [section 1.1](https://www.worksafebc.com/en/law-policy/occupational-health-safety/searchable-ohs-regulation/ohs-regulation/part-01-definitions#SectionNumber:1.1) of the *Regulation* "qualified" means being knowledgeable of the work, the hazards involved, and the means to control the hazards, by means of education, training, experience, or a combination.

The potential for occupational exposure must be evaluated without regard to the availability or use of personal protective clothing and equipment. That is, the risk to an unprotected worker must be assessed.

# PART 1: SITE RISK ASSESSMENT BY LOCATION (*Instructions*)

**Area Assessed**:

* List each area of the operation in a separate section

**External Exposure Potential**:

* List potential external exposures (visitors, delivery person, contractors, etc.)

**Internal Exposure Potential**:

* List potential internal exposures (fellow workers, maintenance, supervisors, cleaning staff, etc.)

**Risk of Exposure**:

* Rate the risk of overall exposure (low, moderate or high)

**Recommendations**:

* List safe practices (physical distancing, restricting access, removing oneself from area during activity, etc.) Refer to the Appendix for various shared practice protocols. Note: all links and shared practices were applicable at the time of developing this sample exposure control plan. Due to the evolving nature of the COVID-19 pandemic and information relating to it, all links and shared resources need to be re-checked prior to use.

|  |  |
| --- | --- |
| **PART 1: SITE RISK ASSESSMENT BY LOCATION** | |
| AREA ASSESSED | Main Office (*SAMPLE*) |
| External Exposure Potential | Visitors, delivery drivers, lumber truck drivers, office contractors |
| Internal Exposure Potential | Administration staff, cleaning staff |
| Risk of Exposure | (*Low, Moderate or High*) |
| Recommendations  (NOTE: these recommendations are a sample only. Adjust your list to meet your site-specific requirements) | * Physical distancing (2 metres/6 feet) * Leave the area during delivery/cleaning * Sanitize high touch areas (after external person has left) * Limit access to the office (workers, contractors, visitors) * Cleaning staff to elevate sanitization frequency of high touch areas Administration staff to sanitize personal work area at the start and end of each day |
| AREA ASSESSED | Operational Offices (*list all that apply*) |
| External Exposure Potential |  |
| Internal Exposure Potential |  |
| Risk of Exposure |  |
| Recommendations |  |
| AREA ASSESSED | Lunchroom(s) (*list all that apply*) |
| External Exposure Potential |  |
| Internal Exposure Potential |  |
| Risk of Exposure |  |
| Recommendations |  |
| AREA ASSESSED | Shops (*list all that apply*) |
| External Exposure Potential |  |
| Internal Exposure Potential |  |
| Risk of Exposure |  |
| Recommendations |  |

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| --- | --- |
| AREA ASSESSED | Stores (*list all that apply*) |
| External Exposure Potential |  |
| Internal Exposure Potential |  |
| Risk of Exposure |  |
| Recommendations |  |
| AREA ASSESSED | Operating Booths (*list all that apply*) |
| External Exposure Potential |  |
| Internal Exposure Potential |  |
| Risk of Exposure |  |
| Recommendations |  |
| AREA ASSESSED | Computer Rooms (*list all that apply*) |
| External Exposure Potential |  |
| Internal Exposure Potential |  |
| Risk of Exposure |  |
| Recommendations |  |
| AREA ASSESSED | Washrooms (*list all that apply*) |
| External Exposure Potential |  |
| Internal Exposure Potential |  |
| Risk of Exposure |  |
| Recommendations |  |

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| --- | --- |
| AREA ASSESSED | Stand Alone Workstations (example: dropsort) (*list all that apply*) |
| External Exposure Potential |  |
| Internal Exposure Potential |  |
| Risk of Exposure |  |
| Recommendations |  |
| AREA ASSESSED | Multi-employee Workstations (example: grading station with 2 or more workers) (*list all that apply*) |
| External Exposure Potential |  |
| Internal Exposure Potential |  |
| Risk of Exposure |  |
| Recommendations |  |
| AREA ASSESSED |  |
| External Exposure Potential |  |
| Internal Exposure Potential |  |
| Risk of Exposure |  |
| Recommendations |  |
| AREA ASSESSED |  |
| External Exposure Potential |  |
| Internal Exposure Potential |  |
| Risk of Exposure |  |
| Recommendations |  |

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| --- | --- |
| AREA ASSESSED |  |
| External Exposure Potential |  |
| Internal Exposure Potential |  |
| Risk of Exposure |  |
| Recommendations |  |
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| External Exposure Potential |  |
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| Risk of Exposure |  |
| Recommendations |  |
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| External Exposure Potential |  |
| Internal Exposure Potential |  |
| Risk of Exposure |  |
| Recommendations |  |
| AREA ASSESSED |  |
| External Exposure Potential |  |
| Internal Exposure Potential |  |
| Risk of Exposure |  |
| Recommendations |  |

# PART 2: JOB CLASSIFICATION RISK ASSESSMENT (*Instructions*)

## Job Classification

* List all job classifications/positions for operation
* Job classifications can be grouped if exposure potential does not change (example: all log yard mobile equipment operators fall into one job classification regardless of the type of mobile equipment they operate)
* Include administration and management positions

Potential Exposures:

* List potential exposures for each job classification (person(s) who interact with employees in the classification)

Contact/Frequency:

* List contact frequency (*Low, Moderate or High*) for each person listed in Potential Exposure
* Include notes to explain why the potential exposures are low, moderate or high (i.e.: what is the normal type of contact, relevant task(s) for contact, frequency of contact)

Risk of Exposure:

* Determine overall level of risk exposure (low, moderate or high)

|  |  |  |  |
| --- | --- | --- | --- |
| **PART 2: JOB CLASSIFICATION RISK ASSESSMENT (*SAMPLE*)** | | | |
| **Job Classification** | **Potential Exposures** | **Contact/Frequency** | **Risk of Exposure** |
| Log Yard (Mobile Equipment Ops) | Supervisor  Workers  Log Haulers | (S) Low (radio communication)  (W) Moderate (at breaks, during maintenance, fueling)  (LH) Low (verbal or radio contact) | Low to Moderate |
| Log Yard (Scale Ops) | Supervisor  Workers  Log Haulers  Visitors | S) Low (radio communication)  (W) Low (at breaks)  (LH) Low (verbal with distancing or radio contact)  (V) None | Low |
| Barker Operator | Supervisor  Workers  Visitors | (S) Low (radio communication)  (W) Moderate (at breaks, during maintenance)  (V) None | Low |
|  |  |  | Low |
|  |  |  | Moderate |
|  |  |  | Moderate to High |
|  |  |  | High |
|  |  |  |  |
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# PART 3: SITE EXPOSURE CONTROL PLAN (*Instructions*)

## ACTIVITY/AREA/JOB GROUP

* List all relevant and/or site specific activities, areas or job groups. Include in the list areas that require specific safe practices.

## SAFE PRACTICE

* List any developed safe practice or procedure that will minimize or eliminate potential exposures relevant to the activity/area/job group.

*Note: the activities/areas/job groups are a sample only. Each site will need to list the various activities/areas/job groups for their specific site(s) and list applicable safe practices to mitigate exposures. Many of the safe practices listed are from shared industry resources. These were applicable at the date the sample was developed. Read these carefully to ensure they are adequate for eliminating exposures.*

|  |  |
| --- | --- |
| **PART 3: SITE EXPOSURE CONTROL PLAN (*SAMPLE*)** | |
| **ACTIVITY/AREA/JOB GROUP** | **SAFE PRACTICE** |
| PPE - PERSONAL PROTECTIVE EQUIPMENT | * All PPE will be provided by the supervisor. * Current Safe Work Parctices/Job Safety Analysis will define the minimum PPE required for your job or task |
| SITE VISITS AND VISTORS | * All visitor access to the operation will be limited to critical tasks or deliveries only. |
| Site Housekeeping | * All common areas of the operation will be sanitized following the schedule located in Appendix A (XXX) |
| PERSONAL HYGIENE: | Proper hygiene can help reduce the risk of infection or spreading infection to others, therefore immediately:   * Each person entering the workplace is required to wash their hands with disinfecting soap and hot water and/or use the alcohol-based hand sanitizer provided. * All employees are encouraged to wash their hands often with soap and water for at least 20 seconds, especially after using the washroom or if using effective alcohol-based hand sanitizer, rub until dry. * When coughing or sneezing all employees must: * cough or sneeze into a tissue or the bend of their arm * dispose of any used tissues as soon as possible in a lined waste basket and wash hands immediately afterwards * All employees must avoid touching their eyes, nose, or mouth * All employees must not share eating utensils, drinks, towels or cigarettes All employees will sanitize the lunchroom table area in front of them prior to and after eating.. Sanitizer and disposable towels will be provided on all tables. * Storage of food and/or drink in common-use refrigerators or other locations is prohibited. |
| Workstation Hygiene | * All workstation touch areas (control buttons, ledges, tools) will be cleaned prior to starting work and after work finishes. * Employees will limit entering into mill offices and computer rooms unless their job requires them too. * MCC switches located in high touch areas will be sanitized by trained employees or machine centre operators at the start and end end of each shift. * If more than one employees is required to throw electrical switches during their normal work activities, each worker will wear personal protective gloves . The gloves will be used only for throwing switches and will remain in a location to minimize contamination. Workers will also handle scissor clips using gloves. |
| Offbearing Work /Lumber Piler | If offbearer workers are not able to maintain distancing (2 metres/6 feet), then they will be required to wear faceshields attached to their helmets when working within 2 metres/6 feet of another employee. |
| PHYSICAL DISTANCING: (At Work and At Home) | It is imperative that everyone practice the social distancing recommendations of the provincial and federal governments including:   * avoiding non-essential gatherings * avoiding touch-based greetings such as handshakes * avoiding crowded places such as concerts, arenas, conferences and festivals * limiting contact with high-risk people like seniors and those in poor health * keeping a distance of at least 2 arms lengths (approximately 2 metres/6 feet) from others. |
| STAGGERING BREAKS AND  SHIFT START AND END TIMES | * Lunch Breaks, coffee breaks and shift start and end times will be staggered to limit the number of individuals who may be arriving, leaving or taking a break simultaneously. * All employees are directed to arrive at work and enter the worksite no more than 15 minutes prior to the start of their shift and to ensure social distancing from others to help limit contact with one another. * Employees will not congregate in the parking lot before or after work. |
| TRAVEL FOR WORK PURPOSES | All travel for work purposes is postponed until further notice. |
| WORKING REMOTELY | * Management will direct all employees who have the ability to work from home to do so until further notice. * Worksite access will be scheduled to support the workflow and minimize the number of individuals in the workplace. * Follow all procedures listed in the Working from Home policy listed in appendix |
| Records | * Records will be maintained for all worksite cleaning, sanitizing activities, inspections, employee training and competency assessments. * Checklist for the various work areas are located in Appendix B (Work Area Sanitization Checklist) |
| Training & Monitoring | * All employees will be trained in required policies and procedures. Records will be maintained in (XXX). * Supervisors will monitor all work activity to ensure compliance with social distancing and sanitizing activities. Records of documented observations and employee contact for COVID-19 mitigation and control will be located in (XXX) * Additional employees (light duty, JOHSC worker representatives and surplus workers) may be used to help sanitize, clean and monitor distancing. |

# Appendix

* [Workstation Hygiene Best Practice](https://www.bcforestsafe.org/resource-topic/covid-19-resources/)
* [Covid-19 Enhanced Surface Cleaning and Disinfection](https://www.bcforestsafe.org/resource-topic/covid-19-resources/)
* [What If Protocol](https://www.bcforestsafe.org/resource-topic/covid-19-resources/)
* [Symptoms of COVID-19](https://www.bcforestsafe.org/resource-topic/covid-19-resources/)
* [Self-Monitoring, Self-Isolation Poster](https://www.bcforestsafe.org/resource-topic/covid-19-resources/)
* [COVID-19 – Protect You and Your Family](https://www.bcforestsafe.org/resource-topic/covid-19-resources/)
* [COVID-19 Reduce the Risk of Infection](https://www.bcforestsafe.org/resource-topic/covid-19-resources/)

**Disclaimer**

BCFSC documents and resources have been developed for industry as guidelines and reference documents for employers and employees to use to help reduce spread of COVID-19. BCFSC developed documents will contain COVID-19 information relevant at the time the document was created. As information is updated regularly, the BCFSC encourages workers and employers to visit the [BC Centre for Disease Control](http://www.bccdc.ca/health-info/diseases-conditions/covid-19) for personal health care inquiries or visit [WorkSafeBC](https://www.worksafebc.com/en/about-us/covid-19-updates) for regulatory information relating to workplace safety.