

6951 Westminster Highway, Richmond, BC  
Mailing Address: PO Box 5350 Stn Terminal, Vancouver BC, V6B 5L5  
Telephone 604 276-3100 Toll Free 1-888-621-7233 Fax 604 276-3247

The *Workers Compensation Act* requires that the employer must post a copy of this report in a conspicuous place at or near the workplace inspected for at least seven days, or until compliance has been achieved, whichever is the longer period. A copy of this report must also be given to the joint committee or worker health and safety representative, as applicable.

A revised version of the *Workers Compensation Act* took effect on April 6, 2020. The B.C. government's revisions aim to make the Act easier to read and understand, and to reorganize the numbering to make laws easier to find. The revisions make no changes to B.C.'s laws concerning workers' compensation, occupational health and safety, and employers' assessment premiums. Please be aware there may be a transitional period where correspondence from WorkSafeBC may include references to either the previous Act or the revised Act. For more information, visit [www.worksafebc.com/WCA2019](http://www.worksafebc.com/WCA2019) or call the Prevention Information Line at 604.276.3100, or toll free within BC at 1.888.621.7233 (SAFE).

**Inspection Report #202016537217A**

Employer Name	Jobsite Inspected	Scope of Inspection
PROVINCIAL GOVERNMENT (WORKERS'COMP CO-ORDINATOR)	British Columbia 99 Alice Lake Provincial Park Squamish BC V0N 1H0	This is a follow up document after requesting documentation.

Date of Initiating Inspection	Date of This Inspection	Delivery Date of This Report	Delivery Method
Sep 16, 2020	Sep 16, 2020	Sep 16, 2020	Email

**THERE ARE FIVE (5) ORDERS OR OTHER ITEMS OUTSTANDING**

**ACTION REQUIRED**

**Summary of Orders or other Items**

See "Orders/Items – Full Details" section of this Inspection Report for orders/items cited

Order/Item No.1 <input type="checkbox"/>	Status: <b>Outstanding</b>	Cited: <b>WCA21(1)</b>
Notice of Compliance Report Required.		
Order/Item No.2 <input type="checkbox"/>	Status: <b>Outstanding</b>	Cited: <b>OHS5.2</b>
Notice of Compliance Report Required.		
Order/Item No.3 <input type="checkbox"/>	Status: <b>Outstanding</b>	Cited: <b>OHS4.28(1)</b>
Notice of Compliance Report Required.		
Order/Item No.4 <input type="checkbox"/>	Status: <b>Outstanding</b>	Cited: <b>WCA31(a)</b>
Notice of Compliance Report Required.		
Order/Item No.5 <input type="checkbox"/>	Status: <b>Outstanding</b>	Cited: <b>WCA21(2)(e)</b>
Notice of Compliance Report Required.		



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ORDER STATUS LEGEND	
Order Status	Description
Outstanding	Order Outstanding - Action Required to Achieve Compliance
Complied	Compliance Achieved - No Further Action Required
Closed	Order is Closed
Rescinded	Order has been cancelled – No Further Action Required

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## **INSPECTION NOTES**

Any further enforcement action identified and/or considered is set out in the order(s).

If this report has been issued following an incident that is under investigation by WorkSafeBC, further enforcement action may be taken as a result of the findings of the investigation and any orders in this report.

This is a follow up to the requested documentation during my site visit to Alice lake, located within inspection report 202016537213A issued September 3, 2020.

I am in receipt of a number of documents sent by the PPA Section Head for the Sea to Sky area.

At this time, I have not received a copy or access to the Safety Management and Accident Prevention Program manual,

The program manual has reportedly been updated as follows by major headings and this was outlined in my first report.

Volume #1

Policy Sept 2016  
General Rules April 2015  
Pre Job Planning, Meetings and Communications - Sept 2016  
Meetings April 2015  
Communications April 2015  
Roles and Responsibilities was updated Feb 2020  
Requirements of the Program Feb 2020  
Supervision April 2015  
Occ H&S Committees Sept 2016  
Training Sept 2016  
Records and Statistics April 2015

Volumes numbers 2 & 3 with more details of various safety elements- and then SWP's I have no additional information on. These dates are approximate but have been confirmed as accurate.

Based on this information and no further information being provided by the employer at this time, the Annual review and updating is not being done. By not doing the annual review of this manual, the employer is placing their employees and other workers at risk.

The employer's responsibility is to make sure staff are fully trained and oriented on dangerous work and pointing them to an outdated and incorrect manual to follow instructions before doing dangerous activities for the first time is not fully diligent. See order #1

### **The procedures which I have received at this time.**

Safe Work Procedures – Abandoned camp clean-up April 27, 2020  
Modified - 2020 PROVINCIAL RANGER TRAINING OVERVIEW  
COVID-19 RESPONSE Cleaning and Disinfecting Procedures for Public Facilities  
COVID-19 RESPONSE Safe work procedures for staff  
Park Ranger Risk Assessment Review 2012  
List of Training Courses provided to BC Parks staff for specific job requirements  
Defensive tactics training list - 2019  
Verbal Judo training list -2019

Chainsaw training 2019 - south region

List of Training Courses provided to BC Parks staff for specific job requirements (Pemberton)

Training Courses staff list for Squamish and Pemberton

### **Safe Work Procedures – Abandoned camp clean-up April 27, 2020**

This procedure has elements for blood-borne pathogen clean up but states "BC Parks are occasionally used by individuals as temporary living locations" Based on the occupation of parks in Victoria and Vancouver and other municipalities occasionally may not be appropriate terminology for this procedure given the current environment within other parks.

When I discussed this during my initial site visit I specifically requested procedures for duties related to cleaning of toilets within the parks as this is not something that would be done occasionally but I would expect is done regularly.

I also note this procedure to be very broad in scope where it discusses " Assault – violence from squatters" It doesn't refer the workers to a violence risk assessment or procedures.

The employer is required to identify the chemical agent or biological agent, its possible effects on worker health and safety and any precautions required to protect the health and safety of the worker. The information is then to be clearly communicated to the worker, with written procedures prepared and implemented to eliminate or minimize a risk of exposure to a chemical agent or biological agent. Training would also be expected of these procedures. See order #2

### **Pandemic related to Covid-19 return to work.**

This is a worldwide issue and is a serious concern for all workers and the general population in this province. The Provincial Health Officer in B.C., Dr. Bonnie Henry is the Authority in this province and sets the criteria around the preventive measures. B.C. is currently in a state of emergency and the authority of the Provincial Health Officer includes legal authority related to preventive measures.

WorkSafeBC has been speaking to employers in an effort to provide support and educations to employers on this topic which is part of WorkSafeBC's COVID-19 Construction Inspection Initiative. This phase of inspections is to review this employer's response plans to the current COVID-19 pandemic in relation to worker health and safety at this workplace.

### **Covid-19 information**

COVID-19 is transmitted via liquid droplets when a person coughs or sneezes. The virus can enter via these droplets, through the eyes, nose, or throat if a person is in close contact.

### **Plan Recommendations**

Following the recommendations of the Provincial Health Officer, to minimize the risk of worker exposure to COVID-19 the employer must consider the following:

- Plan work to allow for physical distancing (workers spaced at least 2 metres apart)
- Provide sufficient soap and water or hand sanitizers and post the locations to encourage workers to wash their hands frequently
- Enhance cleaning and disinfecting of the workplace, particularly high contact items such as handrails, shared tools or equipment and washroom facilities
- Workers who are displaying symptoms must go home and self-isolate

More information is available at

<https://authoring.worksafebc.com/en/about-us/covid-19-updates/health-and-safety/construction-information>

### **Assess whether workers need to come to work**

#### **Construction has been deemed essential Services in B.C.**

The first step is for employers to seriously consider whether they can keep their workers out of the workplace. If practicable, employers should:

Curtail non-essential work at the workplace.

Consider having workers work remotely (e.g., work at home).

Learn more about health and safety responsibilities when working from home.

Employers should ensure that the following workers do not come to work:

Workers who are ill, whether or not the illness has been confirmed as COVID-19.

Workers who have travelled internationally. In these cases, they must remain away from the workplace for at least 14 days.

Workers who have an ill person in their home.

Workers who share a residence with a person who has been exposed to COVID-19.

Workers who have been exposed to anyone confirmed to have COVID-19, or to anyone with possible symptoms of COVID-19, should call HealthLink BC at 8-1-1 for an assessment and to determine any necessary next steps.

Put social distancing and other preventive measures in place

#### **Employers will take steps to reduce the risk of exposure to COVID-19.**

The priority should be to take steps to ensure social distancing is practiced in your workplace, including:

If practicable, reconfiguring the workplace to maintain appropriate distance between workers.

Limiting worker participation in in-person gatherings and encouraging practices like teleconferences as an alternative.

Limiting worker travel and the numbers in a given vehicle.

Additional measures will depend on the workplace, but would generally include:

Educating workers on health and safety measures to prevent transmission of infectious disease.

Increase workplace cleaning, provide the necessary supplies, and reinforce personal hygiene messages to workers.

#### **Worker Instruction Training and Supervision**

This pandemic related to Covid-19 requires the employer to train their workers on the topic and provide instruction and training related to the employers procedures for the work site. Supervisors are to ensure these processes are followed.

#### **Worker responsibility**

Workers have a responsibility to take reasonable care to protect the worker's health and safety and the health and safety of other persons who may be affected by the worker's acts or omissions at work. This includes following procedures, and best practices. Understanding your own individual risk tolerance and be considerate of others with different views. Be kind, work together and follow the employers plans and the Provincial health officers direction to the best of your ability. We are all in this together please do your part.

What you can do

- Staff who are ill should stay home.

- If you suspect that you've been exposed to the coronavirus, or have a confirmed case of coronavirus, you need to let your employer know immediately

- Wash your hands often, and always after coughing, sneezing, or blowing your nose. Wash with soap and water for at least 20

seconds, or, if soap and water are not available, use an alcohol-based hand sanitizer.

- Avoid touching your eyes, nose, and mouth with unwashed hands.
- Avoid close contact with people who are sick.
- Social distancing 6 feet or 2 meters
- Clean and disinfect frequently touched objects and surfaces.
- Avoid using co-workers' phones, desks, offices, or other work tools and equipment. If you need to use a co-worker's phone, desk, or other equipment, disinfect it first.
- Cover your cough or sneeze with a tissue, then throw the tissue in the trash. Or cough and sneeze into your sleeve or elbow.
- If you have a fever, cough, and difficulty breathing, stay home and seek medical care early.
- Education and consultation with your staff
- Use Masks when physical distancing is not possible.

Please continue to monitor the directions of the Chief Health Officer and make the necessary adjustments as this situation is changing on a daily basis.

<https://www.healthlinkbc.ca/>

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

### **The Employers Plan**

The employer has implemented at plan at this time. Workers were observed maintaining social distancing and using the provided wash stations and sanitizers. Supervisors on site have been advised to ensure the plan criteria is being followed.

### **Violence Prevention Risk Assessment**

There has been a written violence prevention risk assessment review documented provided by this employer which is dated 2012.

This review is 8 years out of date and therefore there is another 8 years worth of data which needs to be reviewed to determine that the assessment is still accurate. The questions also remains, is this what is being used or is this a review with recommendations which have not been implemented.

Also of note is the collection of incident data which occurs by the front line front country (contractors). This data is critical for a violence prevention risk assessment should be captured by B.C. Parks.

In discussion with a Contractor representative I was advised that the incident data that the contractor collects is submitted to B.C. Parks.

The risk assessment review provided is not acceptable due to age and clarity to those using it. See order #3

### **Joint Occupational Health and Safety Committee**

A committee has recently been formed at Alice lake within the last 6 weeks. The meeting documentation which I observed did not reference who the two chairs were or who are the employee or management representative including who the Chairs are.

The B.C. Parks set up is province wide, and they have only recently set up a committee for the south coast region. This committee is a combined committee with the Conservations Officers Service. I have been advised that committee structures, have been structured depending on who occupies the building.

This type of structure doesn't address the fact that the duties and functions within these various organization are not necessarily

the same. Further, there needs to be a central committee, due to the geographical make of B.C. Parks and the limited numbers in a given office. This would be considered more appropriate to ensure there is a conduit between regions specific to the safety issues Park Rangers encounter throughout B.C. I am open to discussion on structures by region but the use of a central committee is appropriate. See order #4

### **Standard Operating Procedures & training**

During my discussions around helicopter use, and rigging I was advised that there is not standard training or operating procedures for workers, flying, propane, lumber or honey pots from back country locations using a helicopter. See order #5

Training records I reviewed are inconclusive as I would need to interview each worker as to when they last did a task verses when they last received training. Avalanche training for the coming winter should be reviewed and training provided prior to the on set of snow. Boating licensing was also considered as there is different licensing requirements depending on various factors. Standard operating procedures should be reviewed based on associated risk high to low. Flying propane by helicopter without some rigging training would be viewed as high risk. *The employer is expected to audit the workers current training against the duties they have been performing to ensure policy and procedures are accurately followed.*

### **Collaborative approach**

While orders are often regarded by employers and others as punitive in nature, they are not meant to punish. Orders are meant to provide direction to the workplace parties to ensure compliance with general duties and other requirements that address specific hazards at the workplace, thereby ensuring the health and safety of all. This is true of worker orders as well as orders to other parties.

### **Province wide**

These orders and other requirements should be looked at on a province wide basis as this region is only considered a snap shot of the south coast region.

If you have any questions or concerns regarding this report please direct all inquiries to the under signed.

Occupational Safety Officer, Lee Fletcher, CRSP, ASCT.

By one of the following options:

Telephone: 604 232 1571

Email: lee.fletcher@worksafebc.com

Fax: 604 233 9791

Mail PO Box 5350 Stn Terminal Vancouver, BC V6B 5L5

**ORDERS/ITEMS**

**An employer who fails to comply with Occupational Health and Safety ("OHS") provisions of the *Workers Compensation Act*, the Occupational Health & Safety Regulation, or WorkSafeBC orders may be subject to monetary or other sanctions as prescribed by the *Workers Compensation Act*.**

**Orders/Items - Full Details**Order/Item No.1 ☐Status: **Outstanding**Cited: **WCA21(1)**

The employer has not ensured the health and safety of all workers working for that employer, and any other workers present at a workplace at which that employer's work is being carried out.

In reviewing the Safety Management and Accident Prevention information which was provided, the following dates related to each topic below indicate that the employer has not been doing everything to ensure the health and safety of all workers and any other workers at this work place.

Program has been updated as follows by major headings :

Policy Sept 2016

General Rules April 2015

Pre Job Planning, Meetings and Communications - Sept 2016

Meetings April 2015

Communications April 2015

Roles and Responsibilities was updated Feb 2020 \*

Requirements of the Program Feb 2020 \*

Supervision April 2015

Occ H&S Committees Sept 2016

Training Sept 2016

Records and Statistics April 2015

Annual review and updating required.

\* Completed

This is in contravention of the Workers Compensation Act Section 21(1).

Every employer must ensure the health and safety of:

- (i) all workers working for that employer, and
  - (ii) any other workers present at a workplace at which that employer's work is being carried out, and
- (b) comply with the OHS provisions, the regulations and any applicable orders.

**Measures to Ensure Compliance:**

Pursuant to section 88 (1) of the Workers Compensation Act, the employer must prepare a Notice of Compliance report. In accordance with section 88 (2), this report must detail what has been done to comply with the order, and where compliance has not been achieved by the time the report has been submitted, include a plan of what will be done to comply and when compliance will be achieved. Please submit the report no later than Nov. 15, 2020.



**Orders/Items - Full Details**

Order/Item No.2 <input type="checkbox"/>	Status: <b>Outstanding</b>	Cited: <b>OHS5.2</b>
<p>This employer was requested to provide a written procedures for cleaning of toilet facilities within the park.</p> <p>As human waste can contain blood-borne pathogens, procedures need to outline the potential hazards and possible routes of entry.</p> <p>Training on these procedures are also necessary and there are not any records submitted specific to this.</p> <p>This is in contravention of the Occupational Health and Safety Regulation Section 5.2.</p> <p>If a worker is or may be exposed to a chemical agent, or biological agent designated as a hazardous substance in section 5.1.1, which could cause an adverse health effect, the employer must ensure that</p> <ul style="list-style-type: none"><li>(a) the identity of the chemical agent or biological agent, its possible effects on worker health and safety and any precautions required to protect the health and safety of the worker are clearly indicated by labels, MSDSs, or other similar means,</li><li>(b) the information required by paragraph (a) is clearly communicated to the worker,</li><li>(c) written procedures are prepared and implemented to eliminate or minimize a risk of exposure to a chemical agent or biological agent by any route that could cause an adverse health effect, and to address emergency and cleanup procedures in the event of a spill or release of a chemical agent or biological agent, and</li><li>(d) the supervisor and the worker are trained in and follow the measures required in this Part and Part 6 of this Regulation for the safe handling, use, storage and disposal of the chemical agent or biological agent, including emergency and spill cleanup procedures.</li></ul> <p><u>Measures to Ensure Compliance:</u></p> <p>Pursuant to section 88 (1) of the Workers Compensation Act, the employer must prepare a Notice of Compliance report. In accordance with section 88 (2), this report must detail what has been done to comply with the order, and where compliance has not been achieved by the time the report has been submitted, include a plan of what will be done to comply and when compliance will be achieved. Please submit the report no later than Nov 15, 2020 .</p>		
Order/Item No.3 <input type="checkbox"/>	Status: <b>Outstanding</b>	Cited: <b>OHS4.28(1)</b>
<p>A risk assessment review as the document has been titled, has been completed for this workplace, however it is date 2012. I note that regulations have been copied into this document during the an updating process but have failed to copy the entire section. 4.31 is missing.</p> <p>This review is 8 years out of date and therefore there is another 8 years worth of data which needs to be reviewed to determine that the assessment is still accurate. The questions also remain, is this what is being used or is this a review with recommendations which have not been implemented?</p> <p>The risk assessment review provided is not acceptable due to age and clarity to those using it.</p> <p>This is in contravention of the Occupational Health and Safety Regulation Section 4.28(1).</p> <p>A risk assessment must be performed in any workplace in which a risk of injury to workers from violence arising out of their employment may be present.</p> <p><u>Measures to Ensure Compliance:</u></p> <p>Pursuant to section 88 (1) of the Workers Compensation Act, the employer must prepare a Notice of Compliance report. In accordance with section 88 (2), this report must detail what has been done to comply with the order, and where compliance has not been achieved by the time the report has been submitted, include a plan of what will be done to comply and when compliance will be achieved. Please submit the report no later than Nov. 15, 2020.</p>		

**Orders/Items - Full Details**Order/Item No.4 ☐Status: **Outstanding**Cited: **WCA31(a)**

This employer has not established and maintained a joint health and safety committee in each workplace where 20 or more workers of the employer are regularly employed. The BC Parks set up is province wide and they have only recently set up a committee for the south coast region. This committee is a combined committee with the Conservations Officers Service.

There are concerns related to this structure in that the duties and functions are not necessarily the same within the two organizations. Further, the need to have a central committee due to the geographical make of B.C. Parks and the limited numbers in a given office would be considered more appropriate and beneficial.

The BCGEU as the union for these employees must be consulted to ensure the effectiveness for their members.

WorkSafeBC has identified that B.C. Parks has not created an overall committee structure or committees throughout the province specific to B.C. Parks only.

WorkSafeBC is willing to listen to the solutions purposed by the Union in conjunction with B.C. Parks but a proper effective structure must be established.

This is in contravention of the Workers Compensation Act Section 31 (a).

An employer must establish and maintain a joint health and safety committee in each workplace where 20 or more workers of the employer are regularly employed

Pursuant to section 44 of the Workers Compensation Act, the employer must post any order written under Division 5 of the OHS Provisions and keep it posted for 12 months.

**Measures to Ensure Compliance:**

Pursuant to section 88 (1) of the Workers Compensation Act, the employer must prepare a Notice of Compliance report. In accordance with section 88 (2), this report must detail what has been done to comply with the order, and where compliance has not been achieved by the time the report has been submitted, include a plan of what will be done to comply and when compliance will be achieved. Please submit the report no later than Nov. 15, 2020.

**Orders/Items - Full Details**Order/Item No.5 ☐Status: **Outstanding**Cited: **WCA21(2)(e)**

This employer has not provided the workers with adequate information, instruction, training and supervision when flying propane and other hazardous materials such as a containers of human waste. I requested training records for rigging and was advised this had not been completed.

I also requested training records related to working around a helicopter and was not provided any records specific to this, including a standard operating procedure for workers.

This is in contravention of the Workers Compensation Act Section 21 (2)(e).

An employer must provide to the employer's workers the information, instruction, training and supervision necessary to ensure the health and safety of those workers in carrying out their work and to ensure the health and safety of other workers at the workplace.

**Measures to Ensure Compliance:**

Pursuant to section 88 (1) of the Workers Compensation Act, the employer must prepare a Notice of Compliance report. In accordance with section 88 (2), this report must detail what has been done to comply with the order, and where compliance has not been achieved by the time the report has been submitted, include a plan of what will be done to comply and when compliance will be achieved. Please submit the report no later than Nov. 15, 2020.

## REFERENCES

In addition to any orders, or other items, and the information provided in the Inspection Notes section in this Inspection Report, the officer may discuss other health and safety issues with the employer arising out of the inspection. The information below sets out the health and safety requirements discussed with the employer, and unless otherwise noted, violations of these requirements were not observed.

Reference	Details Discussed
<b>WCA88(1)</b>  This Inspection Report contains one or more orders requiring you to submit a Notice of Compliance report. This report must be prepared in accordance with section 88(2) of the Workers Compensation Act.	Requirement to submit Notice of Compliance Report set out in applicable order.
<b>WCA88(2)</b>  The employer or other person directed by an order under subsection (1) must prepare a compliance report that specifies:  (a) what has been done to comply with the order, and (b) if compliance has not been achieved at the time of the report, a plan of what will be done to comply and when compliance will be achieved.	Requirement to submit Notice of Compliance Report set out in applicable order.
<b>OHS3.1(1)(a)</b>  An occupational health and safety program as outlined in section 3.3 must be initiated and maintained (a) by each employer that has (i) a workforce of 20 or more workers, and (ii) at least one workplace that is determined under section 3.16 (2) (b) to create a moderate or high risk of injury.	Manual currently out of date
<b>OHS3.1(1)(b)</b>  An occupational health and safety program as outlined in section 3.3 must be initiated and maintained (b) by each employer that has a workforce of 50 or more workers.	Manual currently out of date- see order #1
<b>OHS3.1(1.1)</b>  If subsection (1)(a) or (b) applies to the employer, the occupational health and safety program applies to the whole of the employer's operations.	Manual currently out of date

Employer #	Mailing Address	Classification Unit #	Operating Location
4000	ENVIRONMENT ATTN: s. 22 PROVINCIAL GOVERNMENT PO BOX 9835 STN PROV GOVT VICTORIA BC V8W 9M1	841102	008

Lab Samples Taken	Direct Readings	Results Presented	Sampling Inspection(s)
N	N	N	

Workers onsite during Inspection	Notice of Project Number
14	

Inspection Report Delivered To	Employer Representative Present During Inspection	Worker Representative Present During Inspection	Labour Organization & Local
Jennie Aikman	Jennie Aikman	s. 22	BCGEU

WorkSafeBC Officer Conducting Inspection	Contact Details	
Lee Fletcher	Phone: (604) 232-1571	Email: Lee.Fletcher@worksafebc.com

Inspection Time*	Travel Time*
9 hrs	0 hrs

\*The time recorded above reflects the inspection time and travel time associated with this inspection report and includes time spent on pre and post-inspection activities. Additional time may be added for subsequent activity.

### Request a Review

Any employer, worker, owner, supplier, union, or a member of a deceased worker's family directly affected may, within 45 calendar days of the delivery date of this report, in writing, request the Review Division of WorkSafeBC to conduct a review of an order, or the non-issuance of an order, by contacting the Review Division. Employers requiring assistance may contact the Employers' Advisers Office at 1-800-925-2233.

To submit a request online, visit <https://www.worksafebc.com/en/review-appeal/submit-request>

WorkSafeBC values your feedback. To obtain that feedback, an external market research provider may be contacting you to complete a survey.

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