

THE NEW NORMAL

POLICIES, PROCEDURES AND TRAINING AS A RESULT OF THE COVID-19

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THE NEW NORMAL will be part of our businesses for many months down the road – potentially up to 18 months or longer in which we will need to ensure that our teams are following new protocols, safety measures and procedures that you will need to put in place. This will mean – new policies and procedures and training for everyone.

Under each province's health and safety legislation, employers have an obligation to take reasonable care to maintain a healthy and safe workplace, adapt quickly to changing health environments and provide updated training on the new risks, how they will be addressed through measures to mitigate the risks through administrative controls such as training, safe work practices and policies, personal protective equipment and at times elimination controls to remove the hazard from the workplace as we have had to do with the onset of the COVID-19 with the 14 day isolation periods.

First steps in the review of your current policies is to make sure they provide the best support for your team and outline clearly what is expected of them from your facility's perspective. The policies should clearly outline processes for the facility and your team to follow and the expectations of your team.

In developing and reviewing your policies, always refer to your Health and Safety, Human Rights, Accessibility Standards and Employment Standards requirements by province. The Standards laid out by each province change frequently (often yearly at a

minimum). Every province has similarities but also nuances that make them just different enough that we cannot blanket a policy across all provinces.

In ensuring risk mitigation, by assessing the tasks conducted in the routine of a worker's daily work for the organization is a good place to start prior to developing new or revising existing policies and implementing safe work practices. Where possible, elimination of the risk is best but where that cannot occur, implementing safety procedures and introducing PPE (personal protective equipment) is required along with training your team on the risks and how to mitigate or minimize the risk, training on the use of the PPE and training around the policies and procedures of the organization that have been put in place to protect them.

Let's start with the gradual opening of your golf courses for those of you who are closed; and for those who are still open, looking at how you can mitigate the risks through proper assessment of a workers tasks they conduct and new tasks they would need to do to mitigate the risk of infectious diseases such as the COVID-19 and other diseases that occur in the future.

When it comes to tasks, training and mitigating the risks, you are best to develop Safe Work Practices for each task. These SWP's provide the guidance your team needs to complete each of the tasks safely outlining the proper PPE required and procedures to complete the task.



For example, new measures will need to be put into place in regards to the safe use of golf carts for your members and for your team members responsible for cleaning them. Extra stringent cleaning procedures will need to be in place to be sure to mitigate your liability and risk of others contracting COVID-19 or other diseases that can be contracted from surfaces people touch – not just on golf carts. PPE will be required for your team members who clean the carts after each use. Chemicals will need to be used to clean the surfaces of the golf cart to prevent the potential spread of disease to others, gloves, masks and potentially other PPE such as protective vests to protect the staff member cleaning the golf carts.

In addition, procedures will need to be developed on how to use the chemicals required to clean the golf carts (Safe Work Practices) and documentation kept on file for the chemicals in the form of SDS Sheets (Safety Data Sheets) meeting WHMIS Safety requirements. Finally, the team members conducting these tasks will need to be trained on the procedures and have proper WHMIS training on the specific chemicals they will be using. Generic training is not sufficient. An employer is responsible to ensure a worker is familiar with, properly trained on and understands the risks of all chemicals they use in their day to day tasks at work.

TAKE A LOOK AT...

Existing policies such as your “good health policies” – ensuring your staff do **NOT** come to work when they are sick – following strict guidelines even outside of a pandemic to ensure the safe and healthy work environment for your team and your members. By enforcing strict guidelines for any illness (even outside of states of emergency – pandemic situations) will ensure a smoother transition into change during a pandemic state of emergency orders from the provincial and federal governments.

TAKE A LOOK AT...

Your “absence policies” – making sure they account for unusual emergency, pandemic and natural disaster leaves – stating that during such emergency situations the requirement for doctor’s notes will be removed and outline other nuances allowed during states of emergencies and pandemics that would not be allowed normally.

TAKE A LOOK AT..

Your other leave policies to make sure they are all up to date with any provincial government changes under employment standards, human rights and provincial laws supporting the current state such as leaves for employees staying home to care for a sick family member, school closures (not just during a pandemic but also during school strikes and for employees who want to take a leave due to fear of exposure - potentially due to their health issues). Make your leave policies are robust enough to account for the unusual and unexpected, such as a pandemic or natural disaster. In these policies outline when certain aspects of the policy apply and when it does not. For example, you will want to be specific about job protected leaves as per your employment standards by province, be specific about job protected leaves during a pandemic or other state of emergency and be specific about regular leaves and how they apply.

KEEP TRACK OF...

Your employee absences. Set policies around your leaves that clearly outline expectations around when you expect them to return to work, what you expect from them in regards to communication back to management during their leave and procedures should they not comply with your expectations (with a caveat that sometimes an employee may be in a situation where they cannot communicate back to you – such as if they are hospitalized).

REVIEW...

Your employee assistance programs to make sure they meet the needs of your teams – especially during stressful times such as a pandemic in which they may still be required to work.

TAKE A LOOK AT...

Your employment contracts to ensure they include a clause on temporary and seasonal layoffs, include a clause about states of emergency and ensure they are current with your provincial employment standards regulations and current common law requirements.

BEYOND YOUR EMPLOYEE OBLIGATIONS...

You need to look at your supplier obligations and insurance needs of your organization. Insurance will be very different coming out of this crisis. Be sure to review policies now and implement changes now. Don't wait for policy language to change. Look at your supplier contracts and ensure as you renegotiate new contracts that you have a Force Majeure clause (unforeseeable circumstances that prevent someone from fulfilling a contract) that includes epidemic, emergencies, pandemics and natural disasters to be able to end contracts with suppliers and sub-contractors.

These are just a few of the areas you need to review now in preparation for your seasonal ramp up in opening your golf courses that have been closed during the state of emergency – COVID-19 Pandemic or ramping up for the busy season. Be sure to review all your health and safety policies, develop your Business Continuity Plan and Pandemic Plan in preparation for the second wave and potentially the third waves of the COVID-19. I will talk more about Business Continuity Plans and Pandemic Plans specifically in my next newsletter article.

— BE —
PREPARED!
ACT NOW!



ABOUT THE AUTHOR

Lynne Bard, President of Beyond Rewards Inc. has over 25 years of experience working in Safety, Human Resource and Training; taking the lead role in Safety and Human Resources for her clients. Lynne provides HR Expertise for ECO HR Blog, writes articles for HAZMAT Magazine and safety blogs for HAZMAT's online blog; develops and delivers many safety and hr training programs online and face-to face through Beyond Rewards and as a Professor at Conestoga College. Lynne's expertise has won several awards of excellence in the field and continues to lend experience and credibility to organizations with best practice solutions and processes that lend to the success of her clients businesses.

