



Boardwalk Rental Communities

CSMP (Contractor Safety Management Policy)

The information in this Handbook is intended for general use and may not apply to every circumstance. It is not a definitive guide to government regulations and does not exempt the contractors/readers from their responsibilities under applicable legislation. Contractors shall follow their own health and safety programs and comply with any other verbal or written instructions from Boardwalk. Where a conflict exists between this document and any applicable governmental Code, Act or Regulation, the legislation shall have precedence.

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Definitions

For the purpose of this document, we refer to the following terminology:

Term	Definition
Boardwalk	Boardwalk REIT / Boardwalk Rental Communities
Contractor	Contracted workers, including prime contractors, general contractors, sub-contractors, service providers and consultants
CSMP	Contractor Safety Management Policy
Work	Services which include any labour, duties, functions and activities required to be performed by the Contractor under the contract

Introduction

Boardwalk Rental Communities is committed to maintaining a safe work environment for all Associates, Customers, Contractors and Visitors as well as providing a safe and healthy environment in which to conduct business.

Boardwalk will meet or exceed the legislated requirements as outlined in the Occupational Health & Safety Code. As such, all Contractors are required to meet or exceed the legislated requirements as outlined in the Occupational Health & Safety Code.

Boardwalk has developed this CSMP for all Contractors. Contractor occupational health and safety performance is a critical factor in the awarding and renewal of Boardwalk contracts.

Health & Policy Statement

Boardwalk has a comprehensive health and safety program to ensure that we are compliant with all applicable health and safety legislation. Our program consists of the following elements:

- Health and Safety Education, Communication and Promotion
- Hazard Identification, Assessment and Control
- Site Inspections
- Health and Safety Committees
- Event (near miss, incident and injury) Investigations
- Stop Work Authority

Each Boardwalk site has a Safety Procedures Manual which consists of the following:

- Policies and Guides
- Emergency Response
- WCB
- WHMIS

Our goal is to achieve a zero-injury workplace. To achieve this goal, all Associates and Contractors must work safely and report hazards immediately.

It is Boardwalk's policy that all Contractors perform all work in accordance with all laws, regulations, bylaws, rules and standards applicable to the performance or work on any Boardwalk property.

General Contractor Responsibilities

All Contractors have safety responsibilities while working with Boardwalk. It is our requirement that all Contractors hired by Boardwalk will comply with the following requirements:

- A documented hazard and risk assessment is performed for contracted work. The assessment shall identify qualifications required of the Contractor, as well as controls and barriers required to guard against identified hazards. This assessment should be kept on hand by the Contractor should Boardwalk require a copy.
- A “Contractor Safety Checklist” is completed before starting work – See Appendix A
- Ensure first aid services, personal protective equipment and safety supplies are available at the work site.
- Take all necessary steps to protect all workers and third parties from injury or illness.
- Ensure all equipment provided by the contractor is maintained in safe working order as per the manufacturer’s specifications or locked-out and tagged appropriately.
- All work procedures must meet or exceed applicable legislation and/or industry best practices;
- Must provide competent supervision at the work site.
- Must ensure only qualified workers, or workers working under the direct supervision of another competent worker, are permitted to conduct work activities at the worksite.
- Must ensure all necessary personal protective equipment is worn properly and maintained in serviceable condition.
- Must investigate and resolve identified health and safety issues, incidents, accidents, property damage and concerns within their worksite as soon as reasonably possible. Copies of these reports must be forwarded immediately to the health & safety department at health&safety@bwalk.com .
- Implement their company’s disciplinary policy for any worker who does not comply with health and safety requirements.
- Must inform the workers of the hazards and the control measures utilized to eliminate, minimize, or, control those hazards by way of a written hazard assessment.
- The hazard assessment must be available to workers at the worksite.
- Must educate all workers on their right to refuse unsafe work and how to exercise that right when appropriate.
- Have a written emergency response plan in place and available to workers at the worksite.
- Ensure all incidents/accidents are investigated and recommendations implemented.
- All Contractors must be able to provide a WCB/WSIB/CSST Clearance Letter annually to Boardwalk Rental Communities, indicating “good standing” with the WCB/WSIB/CSST.
- All Contractor employees will be certified in, and carry on their person safety certification to operate all equipment such as, Aerial Lifts, Swing Stages, Skid Steers, Forklifts, Scissor Lifts, etc. that will be used for any work on Boardwalk properties.
- All Contractor employees will ensure they have taken reasonable measures to protect Boardwalk and neighboring properties of damages.
- All Contractor employees must take measures, to eliminate or reasonably control (in the eyes of the law) worksite safety risks to the general public, including Boardwalk Customers and Associates and Contractor employees, sub-trades, and suppliers.
- Must complete regularly scheduled inspections and inspection reports must be readily available upon request.

All injuries or incidents that occur on site **MUST** be immediately reported to Health&Safety@bwalk.com.

Hazard Assessment

A hazard assessment is an assessment of the work site to identify existing and potential hazards that may impact the safety of Associates, Customers, Contractors, Visitors, the Public or the Environment.

A hazard assessment must be performed prior to any work beginning at the work site. Contractors must assess each work site and identify existing and potential hazards before work begins at the work site or prior to the construction of a new work site.

If an existing or potential hazard to workers is identified during a hazard assessment, all Contractor employees must take the following measures:

- Eliminate the hazards
- If elimination is not reasonably practicable, control the hazard using engineering controls
- If a hazard cannot be eliminated or controlled using engineering controls, all Contractors must use administrative controls that control the hazard to a level as low as reasonably achievable
- If a hazard cannot be eliminated or controlled using engineering controls or administrative controls the appropriate personal protective equipment will be used by all workers

Hazards Assessments are to be reviewed and/or updated:

- At reasonably practicable intervals to prevent the development of unsafe and unhealthy working conditions
- When a new work process is introduced within the worksite;
- When a work process or operation changes.
- When there is a work site accident/injury/incident

Hazard Assessments must be readily available to all workers at the worksite to ensure all workers affected by the hazards are informed of the hazards and the methods used to control or eliminate the hazards.

Hazard Detection

It is the goal of Boardwalk Rental Communities to eliminate hazards at the work site. As such, Contractor employees are required to report hazards immediately to Boardwalk's Health & Safety Department and the Capital Projects Coordinators & Directors, at Health&Safety@bwalk.com .

If a hazard or unsafe condition/practice is observed, it must be rectified immediately by the means of a work stoppage. All Boardwalk Associates are authorized to issue a "Stop Work Order" in this scenario. Further to the work stoppage or correction of potential hazard, a Boardwalk Hazard Detection form (see Appendix B) should be completed by the Contractor's Site Superintendent or designated Safety Officer and forwarded via e-mail to the address shown above.

Inspections

All Contractors are required to perform regular worksite inspections. The written inspection must document any necessary actions to be taken, who is responsible for completion of those actions, and, anticipated timelines to correct any identified unsafe condition and/or work practice. The inspection process must include a follow-up process to ensure previously identified unsafe conditions and/or work practices are corrected. The Contractor may be required to demonstrate due diligence in that the corrective actions were completed in a timely manner. These reports must be available for review upon request.

When a recommendation is made to correct an unsafe act or condition, written documentation and follow-up must be completed to verify the correction of the unsafe act or condition. This information should be recorded as part of the appropriate project files under performance.

Incident Reporting

Boardwalk requires the reporting of all incidents, which includes; sudden or unforeseen events which could cause or have caused an injury or occupational illness; a release of hazardous materials to the environment; or a near miss.

Item	Description
Hazard	Anything that exists or may exist as a potential for causing loss (physical, environment, education)
Near Miss	An occurrence which could have resulted in an injury/incident, and for which no injury has occurred
First Aid	An occurrence which results in illness or injury where first aid equipment and/or services were utilized, but medical attention from a physician was not required
Medical Aid	An occurrence in which medical attention was required for a Contractor employee from a physician, but did not require time off after the date of occurrence
Minor Damage	An occurrence of property damage below \$1,500.00
Major Damage	An occurrence of property damage of exceeding \$1,500.00

Contractor employees should:

- In the case of any injury, ensure medical assistance, as needed, is provided to the injured worker (e.g. first aid, transport to medical facility, call 911)
- Promptly initiate and/or implement corrective actions within their control to prevent similar injuries/accidents/incidents
- Notify Health&Safety@bwalk.com and Capital@bwalk.com of the incident or injury via email with the following details:

Contractor and Contractor Employee Name
Date of Injury
Brief Description of Incident/Injury

Prime Contractors

When is a Prime Contractor Required?

A work site with only one employer does not require a prime contractor. A work site with multiple employers carrying out interrelated work activities and/or whose activities may have a health and safety impact on each other (i.e. multiple employer work sites which require coordination, communication, etc. amongst employers to ensure safety) must have a prime contractor for the site. The multiple employers and their workers do not have to be working at the same time at the site to meet the requirement. For example, a construction site involving multiple employers will require a prime contractor until the construction is fully completed.

Even with the appointment of a prime contractor, each employer, worker, contractor, and supplier retains responsibility for ensuring the health and safety of workers.

Who is the Prime Contractor?

In cases where a prime contractor is required, the owner of the work site is the prime contractor unless other arrangements have been made. In some cases, the owner may not have the knowledge or is unable to take on this responsibility. By entering into an agreement with another party, the owner can transfer the prime contractor title and responsibilities to that party (an individual or a corporate entity). A written document can provide proof that an agreement has been made between parties.

In entering into this agreement, it is necessary to ensure that the other party is capable of, and likely to, fulfill the prime contractor responsibilities.

Responsibilities under the Law

A prime contractor is required whenever two or more employers engage in work at a work site. The two employers may not be working at the same time at the site, but their activities may have a health and safety impact on each other or are interrelated. The prime contractor is responsible for coordinating potentially incompatible internal health and safety systems of multiple employers, and for coordinating effective communication in relation to health and safety at a worksite. This is necessary as different employers may all have very effective, independent health and safety systems but which might not be compatible with other employers' systems. Furthermore, a lack of effective communication and a cohesive approach to health and safety may place workers at risk. As a high level "oversight" or "auditing" function the prime contractor is expected to monitor activities to ensure that a worksite's health and safety system is functioning properly.

The general duty of the prime contractor is to do what is reasonably practicable to ensure that the OHS legislation is complied with on the work site. One of the ways a prime contractor can meet this obligation is establishing and maintaining a system or process that ensures compliance with the OHS legislation.

In addition, a prime contractor has the obligation to:

- 1) ensure that first aid services, equipment and supplies the are available at the work site;
- 2) ensure that equipment erected or installed by or on behalf of the prime contractor complies with requirements of the OHS Code as if the prime contractor was the employer;
- 3) ensure that any employer on a work site is made aware of any existing or potential work site hazards that may affect that employer's workers.
- 4) carry out investigation of serious injury incidents;
- 5) manage controlled products.

Establish and maintain a system

The prime contractor has the responsibility to ensure that contractors, employers, and workers at the work site comply with OHS legislation.

One way to meet this obligation is to establish and maintain a system or process that will ensure compliance. For example, an effective health and safety plan can do this. The purpose of the system or process is to have employers cooperate with one another to ensure the health and safety of workers at the work site. Having a prime contractor also helps to make clear who is accountable for what.

The prime contractor is expected to monitor activities at the work site to ensure that the system is functioning properly.

Instances of non-compliance can be considered to be a breakdown of the health and safety system. The prime contractor's system will intervene, correcting the situation and altering the health and safety system if necessary.

First Aid

The prime contractor must also ensure that first aid services, equipment and supplies required by the OHS Code are available at the work site. The required services, equipment and supplies vary depending on the location of the work site, the number of workers at the site and whether the work being performed is considered to be of a low, medium or high hazard.

Erecting or Installing Equipment

The OHS Code extends the prime contractor's responsibilities in cases where equipment is erected or installed by or on behalf of the prime contractor. In such cases the requirements in the OHS Code that have to do with the design, construction, erection or installation of that equipment apply to the prime contractor even though the requirements also apply at the same time to an "employer". This will most often occur in those situations where a prime contractor erects or installs equipment that is to be shared among multiple employers. Sharing equipment in this way may have safety, logistical and economic advantages and can avoid confusion as to who is responsible for the initial and ongoing safety of the installed equipment.

Examples of equipment that can be erected by or on behalf of a prime contractor and for which the prime contractor has responsibility include:

- scaffolds – erected by or on behalf of the prime contractor, multiple employers may then use the scaffolds throughout the lifetime of the project. Individual employers need not erect and dismantle scaffolds for use by their own workers. The prime contractor retains responsibility for inspecting and maintaining the scaffolds;
- guardrails – once installed by or on behalf of the prime contractor, the guardrails remain in place for the duration of the project;
- garbage and waste disposal – in many cases it may be more efficient if the use and removal of waste bins is coordinated through the prime contractor;
- propane tanks for site heating – this is a shared resource that may best be looked after by the prime contractor;
- entry and exit ramps (including portable ladders) – used at construction sites by workers to access the premises (or parts of it), where this is a shared resource it may best be looked after by the prime contractor; and
- fall protection anchors – if used by multiple employers during a project, installation of anchors by a prime contractor may be a preferred option.

The OHS Code does not require the prime contractor to erect or install this shared equipment unless the prime contractor chooses to do so.

Smoking, Drugs, and Alcohol

Smoking is not permitted in any Boardwalk building. Smoking areas are designated outside.

The consumption/use of any alcoholic beverages and/or illegal drugs on any Boardwalk Rental Communities premises is prohibited. Failure to adhere to this Policy will result in the termination of the contract. Boardwalk Rental Communities will not provide over the counter medications to any Contractor employees (ie Tylenol, Aspirin, and Advil).

Appendix A: Contractor Safety Checklist

This form should be completed before beginning work with a new Contractor.

Contractor Information			
Name of Contractor:		Address:	
Contact Name:		Contact Email:	
Telephone #:		Fax #:	
Safety Officer Name:		Safety Officer Contact #:	
WCB Account #:		COR #: (if applicable)	

Do you have written policies & are your employees trained of the following:				
Policy	Yes	No	Not Applicable	Copy provided (only when requested)
Safety Policies / Program / Orientation				
Hazard Assessment / Detection				
Incident Investigations				
Emergency Response / First Aid				
Only ask about the below policies that are relevant to the scope of work of this Contractor				
Asbestos Removal				
Confined Space				
Electrical Safety				
Fall Protection / Scaffolds / Aerial Lifts				
Flood Clean-Up				
Hazardous Waste Removal				
Lock Out & Tagging				
Motorized Vehicles / Forklifts				
Mould Remediation / Removal				
Personal Protective Equipment				
Respirators				
Substance Abuse				
Welding / Hot Work				

Who will be responsible for safety on the job site:			
Name:		Title:	
Phone #:		Email:	
Has your company had any orders written by occupational health & safety in the past 3 years:			
Comments:			

Associate Name:		Signature:	
Contractor Approved: (Yes/No)		Date:	

Appendix B: Hazard Detection Form

Thank you for taking the time to report a safety hazard at your worksite or unsafe practice by Associates and/or Contractors. Your commitment to contributing to a safer workplace is greatly appreciated! We will follow-up on all hazards that are reported.

Associate Name (optional):	
Leader Name:	
Location (building / site):	
Date of safety hazard or unsafe practice:	

Identify what you have observed (check one):	<input type="checkbox"/> Unsafe Condition <input type="checkbox"/> Unsafe Action by an individual
Describe exactly what type of incident / hazard / behavior you have observed:	
Has this problem been corrected?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know <input type="checkbox"/> In progress
Was this reported to your Leader?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Email this form to health&safety@bwalk.com or fax to 1-866-778-5146