OVERVIEW

This is not a legal document and employers are advised to seek legal advice.

Employers and constructors have obligations to protect workers from hazards in the workplace as set out in the Occupational Health and Safety Act (OHSA) and its regulations and the directives coming from the Chief Medical Officer of Health.

Workers should raise any concerns to their:
- supervisor
- joint health and safety committee
- health and safety representative

This will help ensure the employer has taken all reasonable precautions.

Ontario is currently in the midst of a global pandemic. While the COVID-19 situation is changing rapidly, the legislation and regulations used to govern Ontario’s workplaces are not.

Under Ontario law, employers have the duty to keep workers and work sites safe and free of hazards. Workers have the right to refuse unsafe work. If health and safety concerns are not resolved internally, a worker can seek enforcement by filing a complaint with the ministry’s Health and Safety Contact Centre at 1-877-202-0008. Failure of the employer or constructor to comply with the OHSA and its regulations could result in a stop-work order upon inspection by the Ministry of Labour, Training and Skills Development.

BEST PRACTICES

We know that every workplace is unique. That makes it so important that every workplace assess functions carried out by their workforce to ensure they take action to protect against the main hazards presented by COVID-19.

Things like practicing physical distancing (staying 2 metres away from others), proper hand hygiene, keeping surfaces and objects clean, and preventing contact with potentially infected people – these are all critically important measures. Other information on how you can protect yourself is available on ontario.ca/coronavirus.

We have provided some protection advice below for your consideration. Please keep in mind that introducing any new protective measures should be done as part of a full review of other workplace hazards -- not just COVID 19 alone.

Employers should consult with Joint Health and Safety Committees/Health and Safety Representatives in the workplace on measures to protect workers in the workplace. We want to ensure we enhance our safety, not cause other issues.

Some workplaces already have some existing controls in place that may help reduce the risk of exposure to workers as well, so regular ‘check-ins’ on how controls are helping is highly recommended.

RECOGNIZE HAZARD/ASSESS RISKS

For employees engaged in curbside and/or delivery services, it is recognized that you may have contact with customers and surfaces, such as money, credit cards and products as you work. You could also potentially come in contact with droplets as a result of these interactions. COVID-19 can travel in respiratory droplets that are released into the environment by laughing, coughing or sneezing.
Take a look at where you might minimize those risks within your workplace. Consult public health information to learn the symptoms of COVID-19 infection. Recognize and report these hazards and use appropriate controls. Ensure that you or your co-workers stay home if you or they have symptoms.

We understand—so it’s important to take a look at where you can possibly minimize those risks within your workplace. Take a look at the controls below to see how they may assist you.

**CONTROLS**

To protect yourself from some of these hazards consider the following options:

- Minimize or eliminate exposures by having customers pre-pay online or use credit, debit or e-transfer.
- Establish a process that minimizes time required to receive the customer and complete any curbside transaction (For example—have the customer call or otherwise notify upon arrival)
- Where possible maintain control of loading product into the vehicle. Ask the customer to remain in the vehicle and remotely open the door to limit contact with surfaces. This will aid in maintaining [physical distancing](https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/physical-distancing.html) and avoid un-necessary person to person interactions.
- Following completion of curbside transaction or home delivery, ensure employees sanitize their hands and any surfaces.
- Do not permit customers to use their own containers, reusable bags or boxes.
- Physical distancing (staying 2 metres away from others) requires fewer persons within an enclosed space or area. Establish clear visuals to show where the designated pickup area is located and the boundaries of the pickup area. Customers should be prohibited from exiting their vehicle while they are in the designated pickup area and stay inside their vehicle.
- Establish a procedure for delivery to customer homes that eliminates in-person interactions (For example—drop package off at door and notify customer via call or text message of delivery completion)
- Ensure physical distancing guidelines (2 meters) are met for delivery workers (For example—if two workers are required to complete a delivery and they cannot maintain physical distancing while travelling in the same vehicle, consider the use of a second vehicle or consider installing a transparent physical barrier(s) that does not impede field of vision between driver and any passengers).
- Fresh air circulation and supply should be made available wherever possible (For example—in loading and unloading areas). Increase airflow by opening doors and windows to reduce contaminant build up.
- Increase cleaning frequency—on commonly touched surfaces like material handling equipment (steering wheels, debit machines, carts, dollies, lifts). Cleaning and disinfecting should be performed regularly and after possible exposure. Be sure to follow safe practices regarding cleaning times and cleaning agents.
- Have all employees and visitors [wash their hands](https://www.cdc.gov/handwashing/) thoroughly with soap and water, or an alcohol-based hand sanitizer if soap and water are not available, before entering the workplace, after contact with others, or with surfaces others have touched. Be sure to include handwashing before breaks, at shift changes, after making or receiving deliveries etc. Be sure to keep an adequate supply of soap, paper towels, etc.
- Provide delivery, curbside and other customer facing staff with hand sanitizer for their use only when receiving deliveries, interacting with the public etc.
- If you use a third party delivery service, ensure their training is up-to-date with the latest COVID-19 prevention knowledge as part of your contractor management process.
- Keep up to date with best practices. Consider regular times to check in with public health updates and retrain/revise practices as needed.
Screen workers regularly for health issues. If anyone develops symptoms of COVID-19, implement procedures for reporting the illness and keeping the worker away from others. For further guidance on screening procedures, consult the Ministry of Health at:

If the above recommendations are still not enough for your workplace, as a last resort, consider Personal Protective Equipment (PPE). PPE is only effective if people wear it correctly. Ensure PPE training includes the fit, use, care, putting on and taking off, maintenance, cleaning, storing and limitations of the PPE.

Some example of PPE that may be suited include:

- Gloves – The use of disposable gloves can help limit contact with surfaces, product etc. Be sure you have practices set up for suitable disposal and when gloves should be changed such as torn and or dirty. It’s also important, again, to ensure you consider other hazards that may be present in the workplace before introducing gloves – in some cases, gloves can be an ‘entanglement’ hazard and should not be worn.
- Goggles or face shields – can help with barriers and separation too. They should be assigned to people and not shared and can be used regularly if kept clean. Ensure the goggle or face shield use does not result in workers touching their faces more often because of heat or discomfort.

EVALUATION

COVID-19 has presented challenges workplaces have never encountered before. Keep in mind that any adjustments made today may need readjusting tomorrow. Look at preventative measures on an ongoing basis, and adjust them if they are not working well enough or causing other issues. For example, are people doing what they’ve been asked to do? If not, what is preventing them from doing so? Can you make adjustments and improve?

For anyone who thinks they may have been exposed to or are experiencing symptoms of COVID-19, please start by visiting the Ministry of Health and Long-Term Care website and taking a self-assessment: https://covid-19.ontario.ca/self-assessment/#q0. Please do not visit an assessment centre unless you have been referred by a health care professional. Do not call 911 unless it is an emergency.


RESOURCES

Stay updated with daily government updates on COVID-19:
Government of Ontario
Government of Canada
Public Health Ontario

For more information visit www.wsps.ca/COVID19

NOTE: This document is intended for informational purposes only to provide an overview of the potential hazards posed in the workplace due to COVID-19. It is not intended as medical advice, to provide a comprehensive risk assessment for all workplaces, or to replace any legislated workplace safety obligations. Due to the ongoing evolution of the situation in Ontario and around the world, this document may be used as a guide for Employers in addition to guidance delivered by public health authorities such as the World Health Organisation (WHO), Ontario Ministry of Health, Public Health Ontario and the Centres for Disease Control and Prevention (CDC). Any use which is made of this document by any Employer, or any reliance on or decisions to be made based on it, are the responsibility of the Employer. WSPS and its partners, officers, directors, employees, agents, representatives, suppliers and service providers accept no responsibility for any errors or omissions in content or for damages of any kind or nature suffered by any Employer or any third party as a result of use of or reliance on this communication.