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Health and Safety Policy Overview

Intent

Trinity Fire & Security is vitally interested in the health and safety of its employees. Protection of employees from injury or occupational disease is a major continuing objective.

“We will make every effort to provide a safe, healthy work environment.”

All supervisors and workers must be dedicated to the continuing objective of reducing risk of injury. Trinity Fire & Security is ultimately responsible for worker health and safety, and will take every reasonable precaution possible for the protection of our employees.

We are committed to promoting a safe and healthy workplace for all employees, contractors, customers and visitors. In pursuit of our commitment, Trinity Fire & Security will develop, implement and enforce such policies and procedures that promote and provide a healthier, safer work environment. We understand the importance of safety to the well-being and productivity of our people, and strive to safeguard the workplace from injury and malfeasance through dereliction of duty towards safety. We will act in compliance with all Local, Federal, and Provincial workplace health and safety legislation.

Trinity Fire & Security will act in compliance with all Federal and Provincial workplace health and safety legislation.

Policy

The Right to Refuse Unsafe Work

- This is a legal right of every worker. Trinity Fire & Security is committed to ensuring a safe workplace.
- If you wish to pursue this right, please refer to the Work Refusal Policy in this Manual.

Communication

Trinity Fire & Security encourages open communication on health and safety issues. It is essential to providing an injury-free and productive work environment.

- Employees that voice or identify a health and safety concern will not be subject to retaliation.
- Health and safety comments will be reviewed by Human Resources. The Human Resources team will initiate an investigation on each reported and/or potential hazard.
- Employees are encouraged to inform their supervisor or Human resources of any matter they perceive to be an actual or potential workplace hazard.
- Communication can be written or oral, and may be anonymous, if so desired.
Responsibilities

Board Members and Executives/Employers:

- These company officials are responsible for supplying an effective strategy that can manage the occupational health and safety concerns of Trinity Fire & Security.
- They must ensure that resources are allocated and governed properly to achieve the health and safety requirements of employees, and that their policies comply with Trinity Fire & Security's legal obligations.
- Foster a workplace culture of safety, with appropriate leadership.
- Review the policies efficacy on an annual basis, and revise where necessary.
- Providing the committee with a copy of all orders or reports issued to the employer by a Ministry of Labour Inspector informing the committee of any work-related incidents involving injury, death or occupational illness.

Managers:

- Responsibilities include their assistance in developing, implementing, and enforcing Trinity Fire & Security policies and procedures.
- Must continually promote health and safety awareness with instruction, information, training and supervision to ensure the safe performance of employees.
- Utilize the process of hazard identification, risk management and incident investigation.
- Perform occupational health and safety inspections of the workplace to identify and control any and all hazards to employees.
- Held accountable for the health and safety of workers under their supervision.
- Ensure that employees receive adequate training in their specific work tasks to protect their health and safety.
- Conduct health and safety meetings.

Employees:

- Responsible for compliance with occupational health and safety policies and procedures.
- Must notify managers of any health and safety concerns, so that they may be dealt with promptly.
- Every employee must protect his or her own health and safety by working in compliance with the law and with safe work practices and procedures established by the company.
- Use appropriate personal protective equipment as required.
- Report unsafe or potentially hazardous conditions, without fear of reprisal, to their Manager or Human Resources.

All Staff Are Responsible for the Following:

- Completion of required occupational health and safety training.
- Performance of their duties in a manner conducive to a safe workplace, following all safety practices and procedures.
- Reporting of any incident, injury or hazard as outlined in procedures.
• Report any acts of violence or harassment in the workplace.
• Promoting a hazard-free workplace.
• Learning the posted Emergency Plan detailing their facilities procedures pertaining to: Fire, Weather, or Medical Emergency.

**Young Workers Safety Policy**

**Intent**

The purpose of this Policy is to ensure the safety of all workers, both part time and full time, employed at Trinity Fire & Security. In order to succeed with this goal, Trinity Fire & Security is implementing this policy to outline the expectations of employees and employers in regards to the health and safety of the workplace. Young workers are especially at risk of workplace health and safety incidents and accidents, and as such there is special attention to the procedures that could minimize their risk.

**Minimum Age of Employment**

At all times, Trinity Fire & Security shall meet our legislative obligations when employing young persons, and will act reasonably in assigning duties taking into account the age, knowledge, education and work experience of the young person, identifying any potential danger and giving appropriate instructions, supervising the work by ensuring an experienced adult does so, and providing adequate training before authorizing a young person to perform unsupervised work.

Trinity Fire & Security shall follow the legislation outlined under the Education Act and Supervised Alternative Learning for Excused Pupils Regulation, which states that children under the age of 16 are required to attend school (normally until age 16), and cannot be employed during school hours. After directing an inquiry into the matter, the Provincial School Attendance Counsellor may excuse a child from attendance for various motives, including if he/she has obtained a secondary school graduation diploma or has completed a course of equivalent standing. ss. 21(1), (2), 24, 30(3)

**Assigning Suitable Work**

Before developing or implementing any training Trinity Fire & Security will take great care in assigning suitable work for young workers taking into consideration that jobs which require long training times or a high degree of skill, have a great deal of responsibility, contain critical or risky tasks to be performed (e.g. working with hazardous chemicals) or working alone provide high risk for health and safety issues for young workers.

Thus Trinity Fire & Security will consider the following factors when considering the appropriate work for a young worker:

• Potential hazards are in the workplace environment around the worker.
• Special work situations which may come up which could lead to new risks for this worker.

• Any occasional risks from co-workers, such as welding or machining which could affect the workers nearby.

In slow periods, a young worker might be asked to "help out" other employees. Trinity Fire & Security will ensure that any hazards associated with those jobs are reviewed with the young worker, by both you and the co-worker which will supervise those tasks.

Training

Trinity Fire & Security managers will have communication with the new worker about the job tasks clearly and frequently, repeating and confirming this training over the first few weeks of work, as some new workers may be overwhelmed with instructions at first, and may need to hear this information repeated more than once.

Young workers are specifically required:
  • Not to perform any task until they have been properly trained;
  • Not to leave their work area unless they've been told to do so. Other work sites may have special hazards of which they may be unaware; and
  • Young workers are encouraged to ask before they do something they are unsure of.

Responsibilities

Managers
  • Assist in developing, implementing, and enforcing Trinity Fire & Security health and safety policies and procedures.
  • Must continually promote health and safety awareness with instruction, information, training and supervision to ensure the safe performance of employees.
  • Utilize the process of hazard identification, risk management and incident investigation.
  • Perform occupational health and safety inspections of the workplace to identify and control any and all hazards to employees.
  • Held accountable for the health and safety of workers under their supervision.
  • Ensure that machinery and equipment are safe and that employees work in compliance with established safe work practices and procedures.
• Ensure that employees receive adequate training in their specific work tasks to protect their health and safety.

• Conduct health and safety meetings.

• Ensure equipment, materials and protective devices required by law are provided and used. This includes guards on machinery and the use of protective equipment.

• Ensure that all hazards, illnesses and injuries are reported immediately.

• Understand the hazards in the workplace and inform supervisors of said hazards and how to handle them.

• Encourage all workers, especially young ones, to alert their supervisors immediately if they see something that could endanger their safety.

• Ensure lots of time is allotted to train young workers.

• Demonstrate your commitment to health and safety with your own consistent, safe work practices – and emphasize that unsafe work practices are unacceptable.

• Respond promptly to all health and safety concerns.

• Distribute appropriate testing tools to ensure Young workers are knowledgeable, well trained and confident in their rights and responsibilities in their role.

All staff is responsible for the following:

• Completion of required occupational health and safety training.

• Performance of their duties in a manner conducive to a safe workplace, following all safety practices and procedures.

• Reporting of any incident, injury or hazard as outlined in procedures.

• Promoting a hazard-free workplace.

• Learning the posted Emergency Plan detailing their facilities procedures pertaining to: Fire, Weather, or Medical Emergency.

• Reporting all hazards, illnesses and injuries immediately.

• Understand the hazards in the workplace and inform managers of any unforeseen or potential hazards.

Accident and Incident Reports

• It is the responsibility of every young employee to complete an Accident and Incident Report in the event of a health or safety violation that the employee has either caused or witnessed.
• Accident and Incident Reports should be filled out and submitted to management promptly to ensure the safety of other employees, and to rectify the problem as quickly as possible.

• Management will be responsible for completing any required WSIB/WCB reports.

• Failure to report health or safety violations will be viewed as gross negligence, and may result in disciplinary action up to, and including termination.

• If you are unable to complete a report, please contact human resources so they may guide you thru the process.

*Failure to comply with Trinity Fire & Security health and safety guidelines, or engage in conduct which creates risk for an employee, contractor, customer or visitor, will be met with disciplinary action and/or termination of employment*

Communication

Trinity Fire & Security encourages open communication on health and safety issues. It is essential to providing an injury-free and productive work environment.

To prevent any young worker from feeling apprehensive about voicing their concerns in regards to the health and safety of their role, all concerns will be kept anonymous.

• Employees that voice or identify a health and safety concern will not be subject to retaliation.

• Health and safety comments will be reviewed by Human Resources. The Human Resources team will initiate an investigation on each reported and/or potential hazard.

• Employees are encouraged to inform their supervisor or Human resources of any matter they perceive to be an actual or potential workplace hazard.

• Communication can be written or oral, and may be anonymous, if so desired.
Personal Protective Equipment (PPE)

Intent

Trinity Fire & Security is committed to the health and safety of its employees and, as such, has created this policy on Personal Protective Equipment (PPE). Personal Protective Equipment is legislatively required and can prevent many workplace injuries. This policy must be observed at all times when working in areas requiring personal protective equipment.

Guidelines

• All employees, guests and visitors must wear CSA-approved safety glasses, CSA safety boots, long trousers, long-sleeve shirts, CSA-approved hard hats, and/or any other specialty PPE.
• All PPE used by this company will comply with the requirements of Occupational Health and Safety legislation.
• All PPE used by this company will be stored and maintained in accordance with manufacturer's instructions and requirements.
• All PPE that is damaged, broken or in need of service or repair must be removed from service immediately.
• No piece of PPE will be modified or changed contrary to manufacturer's instructions or specifications or Occupational Health and Safety legislation.

Management Responsibilities

• Management shall ensure that employees are using the appropriate PPEs.
• All employees shall be trained on the use and inspection of all PPEs they may be required to use.
• Management will not allow any employee to perform their duties without PPEs or with damaged PPEs.

Employee Responsibilities

• Employees must follow all guidelines as outlined above. Specifically, they must wear all required PPE when in designated areas.
• PPE must be inspected at the time of issue and before each use by the employee.
• Any PPE that does not pass inspection must be reported to a supervisor.
• Employees may not continue regular duties until they have been reissued the correct PPE.
• Employees must report any unsafe behaviours or potential hazards they see in the workplace to a supervisor.
• Employees may never under any circumstances modify or change a PPE. Uncomfortable PPEs may be due to lack of fit and additional fit testing may be required.

*The safety information contained within this policy does not take precedence over Occupational Health and Safety legislation*
Safe Operating Procedures for Heavy Lifting

Intent

Trinity Fire & Security has adopted the following procedures for lifting and handling materials in an effort to ensure the ongoing health and safety of our staff and to minimize the incidence of injuries in the workplace.

Guidelines

The practice of safe lifting is required for some tasks performed at Trinity Fire & Security in an effort to reduce the risk of acquiring a musculoskeletal injury (MSI). These procedures are based on best practices and are meant to be guidelines rather than exhaustive procedures.

“If you are ever in doubt about lifting an item, always ask for help”

Remember, the first thing to do before any lift is to determine whether the item should be carried at all.

Procedures

Pre-Lift

Prior to the manual lifting, pushing, pulling, handling, carrying or transportation of any materials that may cause strain or injury, the employee must examine the material and:

- determine the approximate weight, size and shape of the load;
- check the writing on the box to determine the contents;
- establish the distance that the load must be physically moved;
- decide on the best possible solution for moving the load (e.g. manually, with assistance or via mechanical support);
- ensure that there is a safe and clear pathway to move the material;
- if you will be moving the material onto a shelf then you must ensure that it will be supported once moved into place, before you actually move it; and
- establish and understand your safe lift zone.

Always plan to push rather than pull.
Safe-Lift Zone

In the event that a load is determined to be either too heavy or awkward to move manually, or where a device that could reasonably move the load is either unavailable or non-existent, the employee must consider alternate methods for moving the load. This may be done using the following techniques:

- Where possible, remove elements of the load to divide the weight, and move it in parts to reduce the potential of injury.
- Obtain assistance from other staff members in moving the material(s).
- Identify and review the methods for performing the necessary tasks, and revise where possible.

The Lift

- Set your feet shoulder width apart, bend your knees and lower your body as required. Ensure that you maintain the natural curvature of your lower back as your back and spine are their most stable in this position.
- Get a firm grip on the load and keep arms and elbows close to your side.
- To lift, the load should be drawn close to your body. Your fingers and hands should be extended around the object.
- Pull the load in, between your knees and as close to your body as possible.
• Remember to keep the load close to your body and be sure to use your thigh and leg muscles; **DO NOT** use your back!
• Use your core strength. Contract your core abdominal muscles while lifting, lowering or moving materials to keep your body more rigid and stable, thus reducing the incidence of injury.

**Safe Carrying**

• Maintain a good grip on the load.
• Remember to keep the load close to your body, arms and elbows in.
• Keep loads at a reasonable height so you are able to see where you are going.
• Make sure to pivot with your feet when carrying loads. **DO NOT** twist your back! A good rule is that your nose, chest, and belly button should all be in one straight line.

**Lowering the Material**

• When lowering material implement the above lifting procedures in reverse.
• If lowering material onto a deep shelf, make sure to put the material on the edge of the shelf and push it back into place. Prior to moving the material ensure that the material can be supported.

**Two-Person Lift Techniques**

When executing a two-person lift, ensure that both people are relatively the same height and have one person be “in charge” of the lift. This person is responsible for guiding the lifting and moving maneuvers.

**It is very important to lift together, walk in step and lower the load together.**
Ladder Safety Policy

Intent

Trinity Fire & Security has adopted this policy to provide procedures that meet and/or exceed the requirements of the Occupational Health & Safety Act in ensuring the consistent protection of all Trinity Fire & Security employees when using ladders.

Guidelines

Ladders are used for access and inspections where 3-point contact can be maintained at all times. Ladder accidents are attributed to the unsafe use of ladders as well as using unsafe ladders! To avoid accidents with portable ladders:

- select the right ladder for the job situation;
- inspect the condition of the ladder before using it;
- inspect the job-site for overhead wires, obstructions, and solid surfaces;
- use the ladder as it was designed to be used;
- remove material and debris away from the base of the ladder;
- set the ladder one foot out for every three or four feet up, and secure the base;
- ensure that the rails of the ladder extend one meter above the landing or point of contact;
- clean the soles of your footwear before climbing the ladder;
- face the ladder when climbing or descending the maintain 3-point contact;
- keep your centre of gravity between the side rails;
- tie-off the ladder at the point of contact;
- hoist tools and materials to the job-site;
- use fall protection as appropriate (e.g. tie-off to the structure when above 3 meters, use climbing devices on fixed vertical ladders, etc.).

Policy and Procedures

1. Supervisors shall provide safety training and education about fall protection for employees required to use ladders and fixed access structures.
2. Employees shall evaluate their requirements for safe access to work assignments and shall consult supervisory personnel as necessary.
3. Ladders and fixed access structures shall be inspected for safety before use.
4. Fixed access structures shall comply with Ontario Ministry of Labour data sheet 2-04.
5. All portable ladders shall be CSA-approved and rated “industrial heavy duty” or “industrial extra-heavy duty”.
6. Employees climbing and working from ladders shall maintain 3-point contact with the ladder.
7. Straight ladders used for access shall be secured at the base and at the point of contact.
8. Fall arrest systems shall be installed and used on all fixed vertical ladders exceeding 3 meters.
9. Defective ladders shall be taken out of service, tagged for repair, or scrapped.
10. Wooden ladders shall not be painted.
11. Ladders and fixed access structures shall be repaired only by qualified personnel.
12. Special purpose ladders and work platforms shall be used in accordance with the manufacturer’s directions and only for the applications intended.

Personal Protective Equipment (PPE)

All Trinity Fire & Security employees that are required to work using ladders will be required to wear appropriate PPE, as outlined in our Personal Protective Equipment (PPE) Policy. PPE used will include safety boots and a harness if needed.

Trinity Fire & Security employees working below or around laddering will be required to wear hard-hats and safety boots.

Safe Ladder Use

- DO NOT use damaged parts that affect the strength of the ladder.
- DO NOT work on ladders when feeling weak, sick, or dizzy.
- DO NOT work while leaning away from the ladder.
- DO NOT alter the ladder.
- DO NOT move a ladder horizontally while workers are on it, unless it is a mobile ladder and the proper procedures are followed.
- DO NOT work on ladders covered with snow, ice, or other slippery materials.
- DO NOT erect, use, alter, or move ladders within 12 feet of overhead power lines.
- DO NOT work on ladders in bad weather or high winds unless the competent person decides that doing so is safe.
- DO NOT use ladders, boxes, barrels, or other makeshift materials to raise your work height.
- DO NOT put more weight on a ladder than it is designed to hold.
Aerial Lift Safety Policy

Intent

Trinity Fire & Security has adopted this policy to provide procedures that meet and/or exceed the requirements of the Federal and Jurisdictional Occupational Health and Safety Legislation by ensuring the consistent protection of all Trinity Fire & Security employees when using Aerial Lifts.

Definitions

The following definition is sourced from Human Resources and Skills Development Canada, Fall-Protection Systems for Mobile Elevated Work Platforms:

**Aerial Platform** – A work platform that is attached to an extendible support, designed to situate individuals and their tools / materials at raised work sites.

**Boom-Lift** – Mobile powered equipment with an aerial platform which can be controlled from the platform. The base of the equipment can be placed beyond the base of the equipment.

**Bucket Truck** – This refers to an aerial platform that is connected to an extended support that is mounted on a vehicle. The elevating functions are typically controlled from the aerial platform, but there are secondary overrides in the vehicle.

**Materials Handling Equipment** – Refers to equipment that is used to transport, lift, move or position individuals, materials, goods or things, but does not refer to elevating devices that are permanently installed within a building.

**Scissor Lift** – Mobile powered equipment with an aerial platform which can be controlled from the platform. The equipment can be elevated vertically, but not completely beyond the base.

Guidelines

- Trinity Fire & Security will ensure the safe operation of aerial lifts at all times.
- Aerial lifts will only be used in conditions that have been approved by the manufacturer.
- No employee shall override hydraulic, mechanical or electrical safety devices.
- Operator’s controls should be clearly and properly labelled, and shall be made accessible to the operator.

Before Operating Aerial Lifts

- Operators shall do a safety check of the area in which work will be conducted for:
  - Level surfaces (e.g. cannot exceed manufacturer’s slope requirements);
  - Holes, drop-offs, bumps, debris, etc.;
  - Overhead obstructions and overhead power lines;
  - Stable surface; and other hazzards
• Operators shall set outriggers, brakes, and wheel chocks, even when working on a level slope.

Training and Education

• Trinity Fire & Security will ensure that employees who operate, inspect and / or maintain an aerial lift receive appropriate training from a competent operator or instructor prior to the operation of the aerial lift.
• Training shall include:
  o A discussion of the hazards involved in operating the lift and the associated precautions;
  o How to operate the lift;
  o Rated load capacity for the lift (including workers, tools, materials, bucket liner, etc.); and
  o Any manufacturer's requirements, as outlined in Operator’s Manual.
• Employees will be expected to demonstrate their skills and knowledge through a demonstration to a qualified trainer.
• Re-training will occur as deemed necessary by Trinity Fire & Security or its’ Supervisors.

Fall Protection

• To prevent injuries associated with falling from heights, employees working from aerial lifts must utilize fall protection equipment that is appropriate to the aerial platform and to the position of the platform.
• To prevent falls, employees must:
  o Always close lift entrance chains or doors;
  o Stand on the floor of the lift platform / bucket; and
  o Avoid leaning on or climbing over the guardrails.

Safe Operating Procedures

To prevent the tipping hazards associated with the operation of aerial lifts Trinity Fire & Security has implemented the following safe operating procedures:

• Prior to operation employees must establish proper work zone protection, particularly when working near traffic, and conduct all necessary checks;
• Operators must operate the lift in accordance with training and manufacturer’s requirements;
• Operators must not exceed the manufacturer’s rated load capacity limits (Note: The combined weight of the employee, tools and materials must be taken into consideration for load limits);
• Workers should never be positioned between overhead hazards and the rails of the basket;
• Operators must properly position lifts, being careful to avoid drop-offs or holes;
• Platforms cannot be raised on uneven and / or soft surfaces, or during windy conditions.
Electrical Safety Policy

Intent

Trinity Fire & Security is committed to promoting a safe and healthy workplace for all employees, contractors, customers and visitors. Trinity Fire & Security will make every effort to provide a safe, healthy work environment. All management, supervisors, employees and contractors must be dedicated to achieving the continued goal of reducing risk of injury in the workplace.

Definitions

CSA: Canadian Standards Association.

Competent Person: A competent person means a person who:

- is qualified because of knowledge, training and experience to organize the work and its performance,
- is familiar with the Occupational Health and Safety Act and the regulations that apply to the work, and
- has knowledge of any potential or actual danger to health or safety in the workplace.

Ontario Electrical Safety Code (OESC): The standard for temporary or permanent electrical installations in Ontario.

Guidelines

Trinity Fire & Security shall ensure the ongoing health and safety of its employees. Trinity Fire & Security shall ensure that any electrical work is to be done in conformance with applicable Ontario legislation. The following guidelines are in compliance with Ontario’s Ministry of Labour’s Electrical Safety Guideline. These guidelines shall be maintained in accordance with any and all applicable legislation in reference to electrical safety.

1. All electrical installations will be acceptable to the Electrical Safety Authority to be determined by a direct inspection or by other arrangements made with the Electrical Safety Authority.
2. All electrical equipment shall be approved.
3. All personnel who are required to use electrical equipment shall be competent in the duties in which they are required to perform.
4. Before work in to be done, a competent person shall conduct a hazard assessment and plan the work to be done in order to avoid any possible hazardous situation, electrical or otherwise.
5. Personnel required to draw power from a power grid to any electrical equipment must be able to determine the electrical needs of each component of that power grid back to the power distribution grid within the facility.
6. All workers and any other individuals onsite shall be warned to stand clear when temporary installation has a power supply connected.
7. The design, construction, installation and inspection of all electrical distribution services shall meet the Canadian Electrical Code standards.
8. The operation and maintenance of electrical distribution services will meet the standards of Ontario’s Electrical Safety Code.
9. Permits will be obtained when necessary prior to any electrical work being completed.
10. Only qualified electricians, or an apprentice working and being supervised by a qualified electrician shall install, modify, and adjust, test or repair electrical distribution services.
11. Prior to work being performed on electrical equipment, should it have the potential of becoming live, the equipment must be isolated, locked out, tagged and tested.
12. Should work need to be performed in the area of live electrical equipment, power lines, etc. Trinity Fire & Security shall ensure that only qualified individuals perform the work, ensure proper Personal Protective Equipment is available and used by workers while completing the work and enact any other safe work measures to ensure the safety and prevent injury to any worker.
13. Circuit breakers and electrical disconnect switches shall be properly labeled and access to these areas shall be maintained and kept clear of obstruction.
14. All electrical equipment and appliances shall be CSA or Electrical Safety Authority of Ontario approved.
15. Employees who work regularly around energized electrical equipment or distribution services shall be qualified in CPR and First Aid.
16. Trinity Fire & Security shall ensure that a qualified electrical worker has approved training in high voltage safety.

Responsibilities

Management is responsible for:

- Taking every precaution reasonable in the circumstances for the protection of a worker;
- Identifying the electrical hazards in the workplace and developing standard operating procedures to manage those risks;
- Ensuring only competent employees do any electrical work;
- Ensuring employees that perform electrical work are adequately protected from shock and burn;
- Ensuring the electricians remain licensed.

Electricians/Electrical workers are responsible for:

- Performing all electrical work in conformance with all applicable electrical legislation and codes in Ontario;
- Reporting to their Supervisor any actual or potential electrical hazards in the workplace;
- Attending all electrical safety training required to become a competent worker;
- Ensuring their electrician’s license or trades ticket remains in good standing.
Workplace Accident Investigation Policy

Intent

Trinity Fire & Security will comply with all required Federal and Provincial regulations, legislation and workplace compliance issues regarding Health and Safety, the correct reporting of any workplace injuries, and will strive to prevent any potential workplace injuries through the implementation of health and safety policies, procedures and programs.

The Workplace Accident Investigation Policy is intended to provide the correct investigatory procedures in the event of a workplace accident/incident. The creation of complete documentation, proper reports and investigations of workplace accidents/incidents will increase our overall readiness to identify and resolve workplace safety issues, reduce workplace injuries, and increase efficiency.

Guidelines

Investigation Procedures Following a Workplace Accident

1. Stop the Process Immediately.
2. Contact the Joint Health and Safety Committee or Representative and conduct an immediate joint investigation (even if the injured worker is not available). Gather all available information such as:
   a. How did accident occur?
   b. Names of witnesses
   c. Objects, equipment, parts, or substances involved in accident.
   d. Maintenance records.
   e. Is there a safe work procedure for the work being performed?
   f. Was procedure being followed?
   g. Did worker receive safety training for work being performed?
3. Identify root causes using “Root Cause Table” (see page 20)
4. Determine and implement temporary or, if possible, long term corrective measures to address root causes before re-starting the process.
5. Complete an accident investigation form and provide copies to the Joint Health and Safety Committee or Representative and the location
6. Ensure that copies of all records reviewed (training records, maintenance records, work procedures, safety talks, equipment drawings) are attached to the accident investigation.
7. Schedule follow-up review to review effectiveness of the temporary and long term corrective measures implemented.
*Remember that the purpose of an accident investigation is to identify the root causes of the accident and to put into place corrective measures to prevent a reoccurrence of the accident. The assessment of blame is not part of an accident investigation*

### Root Causes of Many Accidents

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<td>• Inadequate performance feedback</td>
<td>• Inadequate standards, specifications, design criteria</td>
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<td>• Inadequate performance feedback</td>
<td>• Inadequate assessment of operational readiness</td>
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<td>• Unclear or conflicting assignment of responsibility</td>
<td>• Inadequate monitoring of initial operation</td>
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<td>• Inadequate work planning</td>
<td>• Inadequate evaluation of changes</td>
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<td>• Inadequate reference documents, directives, guidance publications</td>
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<td>• Lack of supervisory/management job knowledge</td>
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<td>• Inadequate matching of individual qualifications and job/task requirements</td>
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<td>• Inconsistent application of standards</td>
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WHMIS Compliance Policy

Intent

Trinity Fire & Security values the safety and well-being of our employees, and will work with them to provide every reasonable safety measure possible. In pursuit of our high-safety standards, and in compliance with Federal and Provincial compliance regulations, Trinity Fire & Security will provide WHMIS (Workplace Hazardous Materials Information System) training for employees.

Guidelines

Trinity Fire & Security will meet all legislative standards as outlined in the Occupational Health and Safety Act, and ensure that information and training on hazardous materials is provided to all staff.

Trinity Fire & Security will ensure that all containers that contain hazardous materials have appropriate labels.

Trinity Fire & Security will ensure that Material Safety Data Sheets (MSDS) are available to provide additional information and detail hazard and precautionary information.

Trinity Fire & Security will ensure that all workplace hazardous materials include Supplier labels, and that suppliers provide the appropriate supplier labels and MSDS.

Trinity Fire & Security shall ensure that workers will have full access to supplier labels and MSDS information.

Training and Education

Trinity Fire & Security shall provide appropriate WHMIS training and education for all staff members who are exposed or likely to be exposed to hazardous materials in the performance of their regular job duties.

Trinity Fire & Security shall consult the joint health and safety committee to ensure the appropriateness of the training and education materials and programs.

The worker training and education program shall include information on the following:

- Workplace and Supplier Labels;
- Identification of Workplace Hazardous Materials;
- Material Safety Data Sheets;
- Hazards associated with materials;
- Procedures for the safe use, storage, handling and disposal of hazardous materials in the workplace;
- Procedures for handling leaks and spills; and
• Procedures in the event of an emergency due to hazardous products.

Trinity Fire & Security will review training and education programs and content annually, and revise where necessary. In the event of any changes, staff will be trained and educated regarding the change(s).

Trinity Fire & Security employees will be compensated for time spent at training sessions, considered to be normal work time, and employees will be paid at the regular rate.

Trinity Fire & Security will respect the right of workers be consulted regarding the development and implementation of the instruction and training, and will open the discussion process to suggestions in a consultation period. Workers will be provided with an opportunity to comment on the content of the program, the amount of training, who is to receive what training, who delivers the training, etc.

Employee Responsibilities

Trinity Fire & Security employees must participate in WHMIS training and education.

Trinity Fire & Security employees must report any violation of the Act or regulations to their immediate supervisor, manager, Human Resources or safety representative.

Trinity Fire & Security employees shall inform their immediate supervisor, manager, Human Resources or safety representative in the event that they do not have the proper information on a controlled product, e.g. the MSDS is missing, damaged or illegible.

For More Information regarding WHMIS:

To View the OHSA WHMIS Guide Online, Go To:

http://www.labour.gov.on.ca/english/hs/whmis/index.html

To Obtain Ministry of Labour Health and Safety Publications Online, Go To:

http://www.labour.gov.on.ca/english/hs/hs_getpubs.html

Legal Compliance

Trinity Fire & Security will comply with all federally and provincially mandated legislation and requirements.
Workplace Stress and Mental Health Policy

Trinity Fire & Security is vitally interested in the ongoing health and safety of our staff, which includes mental health and stress. Stress and poor mental health are associated with many of the leading causes of disease and disability. This policy has been adopted to ensure the promotion and protection of the mental well-being of our staff.

Promotion of Mental Health

Trinity Fire & Security will promote the mental well-being of all staff by:

- Providing staff with resources and information regarding mental health in the workplace;
- Providing a safe work environment that promotes and supports stress reduction and mental health;
- Providing counseling and assistance for staff members who experience problems relating to mental health in the workplace;
- Providing staff with support and reasonable accommodation when returning to work after a period of absence due to stress and/or mental health issues.

Intent

To create a workplace environment that promotes the mental well-being of all employees.

Objectives

1. Trinity Fire & Security shall work to create a workplace that that minimizes excessive sources of stress and poor mental health by addressing workplace issues that contribute to stress, and assist staff members in the development of techniques for managing stress and mental health problems. Trinity Fire & Security will provide support for staff members that experience workplace stress.

   In pursuit of these objectives, Trinity Fire & Security shall:

   - Provide employees with information to increase awareness of the importance of mental health.
   - Provide employees with stress reduction activities, including social events and physical activity.
   - Provide work/life balance for employees through flexible work options.
   - Set achievable goals and objectives and avoid unnecessary overtime.
   - Provide for staff: clear expectations, clear job roles, and the tools needed for success.
   - Provide a workplace free of violence, harassment, bullying and discrimination.
   - Promote open communication.
2. Trinity Fire & Security shall provide a system of support and reasonable accommodation for employees who experience stress and/or mental health issues.

Policy Actions:

- Provide staff with understanding and support in managing mental health issues.
- Encourage staff to obtain medical advice and/or treatment.
- Identify and address workplace issues that contribute to increased levels of stress, and work to eliminate or mitigate these areas of concern.
- Where staff members require time off due to mental health issues, Trinity Fire & Security shall work with the employee to ensure that they can return to work safely, providing reasonable accommodation where appropriate.
- Handle all cases of reported mental health/stress leave and problems with mental health in a confidential manner.

Workplace Anti-Violence and Harassment Policy

Intent

Trinity Fire & Security is committed to building and preserving a safe, productive and healthy working environment for its employees based on mutual respect. In pursuit of this goal, Trinity Fire & Security does not condone and will not tolerate acts of violence or harassment/bullying against or by any Trinity Fire & Security employee.

Our Workplace Anti-Violence and Harassment Policy is not meant to stop free speech or to interfere with everyday interactions. However, what one person finds offensive, others may not. Usually, harassment can be distinguished from normal, mutually acceptable socializing. It is important to remember it is the perception of the receiver of the potentially offensive message be it spoken, a gesture, a picture or some other form of communication which may be deemed objectionable or unwelcome that determines whether something is acceptable or not.

Definitions

Workplace Violence or Bullying:

Workplace violence or bullying is the exercise, statement or behaviour of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker, such as:

- Physical acts (e.g., hitting, shoving, pushing, kicking, sexual assault, throwing an object at a worker, kicking an object the worker is standing on such as a ladder or trying to run down a worker using a vehicle or equipment such as a forklift).
- Any threat, behaviour or action which is interpreted to carry the potential to harm or endanger the safety of others, result in an act of aggression, or destroy or damage property.
• Disruptive behaviour that is not appropriate to the work environment (e.g., yelling, swearing).

Domestic Violence:

A person who has a personal relationship with a worker – such as a spouse or former spouse, current or former intimate partner or a family member – may physically harm, or attempt or threaten to physically harm, that worker at work. In these situations, domestic violence is considered workplace violence.

Personal Harassment:

Any unsolicited, unwelcome, disrespectful or offensive behaviour that an underlying sexual, bigoted, ethnic or racial connotation and can be typified as:

• Behaviour that is hostile in nature, and/or intends to degrade an individual based on personal attributes, including age, race, nationality, disability, family status, religion, gender, sexual orientation, and/or any other Human Rights protected grounds.
• Sexual solicitation or advance made by a person in a position to confer, grant or deny a benefit or advancement to the person where the person making the solicitation or advance knows or ought reasonably to know that it is unwelcome;
• Reprisal or a threat of reprisal for the rejection of a sexual solicitation or advance where the reprisal is made or threatened by a person in a position to confer, grant or deny a benefit or advancement to the person.
• Unwelcome remarks, jokes, innuendoes, propositions, or taunting about a person’s body, attire, sex or sexual orientation and/or based on religion;
• Suggestive or offensive remarks;
• Bragging about sexual prowess;
• Offensive jokes or comments of a sexual nature about an employee;
• Unwelcome language related to gender;
• Displaying of pornographic or sexist pictures or materials;
• Leering (suggestive persistent staring);
• Physical contact such as touching, patting, or pinching, with an underlying sexual connotation;
• Sexual assault; for the most part, victims of sexual harassment are female. However, conduct directed by female employees towards males and between persons of the same sex can also be held to constitute sexual harassment.
• Any actions that create a hostile, intimidating or offensive workplace. This may include physical, verbal, written, graphic, or electronic means.
• Any threats of physical violence that endangers the health and safety of the employee.

Racial/Ethnic Harassment:

Any conduct or comment which causes humiliation to an employee because of their racial or ethnic background, their colour, place of birth, citizenship or ancestry. Examples of conduct which may be racial or ethnic harassment include:
• Unwelcome remarks, jokes or innuendos about a person's racial or ethnic origin;
• Colour, place of birth, citizenship or ancestry;
• Displaying racist or derogatory pictures or other offensive material;
• Insulting gestures or practical jokes based on racial or ethnic grounds which create awkwardness or embarrassment;
• Refusing to speak to or work with someone or treating someone differently because of their ethnic or racial background.

Policy

Trinity Fire & Security is committed to providing a safe and healthy work environment free from violence, threats of violence, discrimination, harassment, intimidation and any other misconduct. Similarly, weapons are strictly prohibited from the Company's premises and violators will be subject to discipline action and the incident will be reported to the police.

It is also a violation of Trinity Fire & Security’s Anti-Violence and Harassment Policy for anyone to knowingly make a false complaint of violence or harassment or to provide false information about a complaint. Individuals who violate this Policy are subject to disciplinary and / or corrective action, up to and including termination of employment.

This Policy prohibits reprisals against individuals, acting in good faith, who report incidents of workplace violence or act as witnesses. Management will take all reasonable and practical measures to prevent reprisals, threats of reprisal, or further violence. Reprisal is defined as any act of retaliation, either direct or indirect.

Trinity Fire & Security will ensure that all employees are trained and educated on violence and harassment and that they are clear about the roles and responsibilities as well as this policy and its procedures. In addition a copy of this policy will be made available to all employees.

Application of this Policy

This policy applies to all individuals working for the organization including front line employees, temporary employees, contract service providers, contractors, all supervisory personnel, managers, officers or directors. The organization will not tolerate violence or personal harassment whether engaged in by fellow employees, managers, officers, directors, or contract service providers of the organization.

Trinity Fire & Security will not tolerate any form of harassment or discrimination against job candidates and employees on any grounds mentioned above, whether during the hiring process or during employment. This commitment applies to such areas as training, performance, assessment, promotions, transfers, layoffs, remuneration, and all other employment practices and working conditions.
All Trinity Fire & Security employees are personally accountable and responsible for enforcing this policy and must make every effort to prevent discrimination or harassing behaviour and to intervene immediately if they observe a problem or if a problem is reported to them.

For the purposes of this policy, harassment/bulling can occur:

- At the workplace;
- At employment-related social functions;
- In the course of work assignments outside the workplace;
- During work-related travel;
- Over the telephone, if the conversation is work-related; or
- Elsewhere, if the person is there as a result of work-related responsibilities or a work-related relationship

**Violence Risk Assessment**

The Company will conduct a risk assessment of the work environment to identify any issues related to potential violence that may impact the operation and will institute measures to control any identified risks to employee safety. This information will be provided to the Joint Health & Safety Committee or Safety Representative.

The risk assessment may include review of records and reports i.e. security reports, employee incident reports, staff perception surveys, health and safety inspection reports, first aid records or other related records. Specific areas that may contribute to risk of violence may include: contact with public, exchange of money, receiving doors, working alone or at night etc. Research may also include a review of similar workplaces with respect to their history of violence.

Trinity Fire & Security will communicate information relating to a person with a history of violence where:

- Workers may reasonably be expected to come into contact with the person in the performance of their job duties; and
- There is a potential risk of workplace violence as a result of interactions with the person with a history of violence.

**The Company will only disclose personal information that is deemed reasonably necessary to protect the worker from physical harm.**

**Reporting Violence or Bullying**

In the event that you are either directly affected by or witness to any violence in the workplace, it is imperative for the safety of all Trinity Fire & Security employees that the incident be reported without delay. Reporting any violence or potentially violent situations should be done immediately to management, or the Human Resources department.
Investigating Reports of Violence or Bullying

The Company Shall:

- Investigate all reported acts / incidents of violence, and:
  - consult with other parties (i.e. Legal Counsel, Health & Safety consultants, JHSCs, Employee Assistance Provider, Human Rights office, Local Police Services)
  - take all reasonable measures to eliminate or mitigate risks identified by the incident;
  - document the incident, its investigation, and corrective action taken.
- Submit a report of the incident to the Ministry of Labour (Note: Ontario requirement) where an employee incurs a lost time injury as a result of violence in the workplace.
- Review this policy and hazard assessments annually, or as changes to job responsibilities or environments occur, and revise the assessment as needed.
- Review annually, in conjunction with review of hazard assessments, the effectiveness of actions taken to minimize or eliminate workplace violence and make improvements to procedures, as required.

Reporting Discrimination or Harassment

Informal Procedure

If you believe you have been personally harassed you may:

- Confront the harasser personally or in writing pointing out the unwelcome behaviour and requesting that it stop; or
- Discuss the situation with the harasser’s supervisor, your supervisor or any other supervisor other than your own.

Any employee who feels discriminated against or harassed can and should, in all confidence and without fear of reprisal, personally report the facts directly to your supervisor or manager.

Formal Procedure

If you believe you have been personally harassed you may make a written complaint. The written complaint must be delivered to the Operations Manager. Your complaint should include:

- the approximate date and time of each incident you wish to report
- the name of the person or persons involved in each incident
- the name of any person or persons who witnessed each incident
- a full description of what occurred in each incident
Investigating Reports of Discrimination or Harassment

Once a written complaint has been received, Trinity Fire & Security will complete a thorough investigation. Harassment should not be ignored as silence can, and often is, interpreted as acceptance. Employees will not be demoted, dismissed, disciplined or denied a promotion, advancement or employment opportunities because they rejected sexual advances or because they lodged a complaint when they honestly believed they were being harassed or discriminated against.

For the purposes of this section the following definitions apply:

**Complainant** – The person who has made a complaint about another individual who they believe committed an act of violence against them.

**Respondent** – The person whom another individual has accused of committing an act of violence.

The investigation will include:

- informing the harasser’s of the complaint
- interview the complainant, any person involved in the incident and any identified witnesses
- interview any other person who may have knowledge of the incidents related to the complaint or any other similar incidents

A copy of the complaint, detailing the complainant's allegations, is then provided to the respondent(s).

- The respondent is invited to reply in writing to the complainant's allegations and the reply will be made known to the complainant before the case proceeds further.
- The Company will do its best to protect from unnecessary disclosure the details of the incident being investigated and the identities of the complaining party and that of the alleged respondent.
- During the investigation, the complainant and the respondent will be interviewed along with any possible witnesses. Statements from all parties involved will be taken and a decision will be made.
- Employees will not be demoted, dismissed, disciplined or denied a promotion, advancement or employment opportunities because they rejected sexual advances of another employee or because they lodged a harassment complaint when they honestly believed they were being harassed.
- Where it is determined that harassment has occurred, a written report of the remedial action will be given to the employees concerned.

If the complainant decides not to lay a formal complaint, Senior Management may decide that a formal complaint is required (based on the investigation of the incident) and will file such document(s) with the person(s) against whom the complaint is laid (the respondent(s)).
If it is determined that personal harassment has occurred, appropriate disciplinary measures will be taken as soon as possible.

**Seeking Immediate Assistance**

Canada’s Criminal Code deals with matters such as violent acts threats and behaviours such as stalking. The police should be contacted immediately when an act of violence has occurred in the workplace or when someone in the workplace is threatened with violence. If an employee feels threatened by a co-worker, volunteer, contractor, student, vendor, visitor or client/customer then an immediate call to “911” is required.

**Fraudulent or Malicious Complaints**

This Anti-Violence and Harassment Policy must never be used to bring fraudulent or malicious complaints against employees. It is important to realize that unfounded/frivolous allegations of personal harassment may cause both the accused person and the company significant damage. If it is determined by the company that any employee has knowingly made false statements regarding an allegation of personal harassment, immediate disciplinary action will be taken. As with any case of dishonesty, disciplinary action may include immediate dismissal without further notice.

**Disciplinary Measures**

If it is determined by the company that any employee has been involved in a violent behaviour, unacceptable conduct or personal harassing of another employee, immediate disciplinary action will be taken. Such disciplinary action may involve counselling, a formal warning and could result in immediate dismissal without further notice.

**Workplace Coordinator**

For the purposes of this policy the Operations Manager shall act as a Workplace Coordinator with respect to workplace violence and harassment issues.

**Confidentiality**

Trinity Fire & Security will do everything it can to protect the privacy of the individuals involved and to ensure that complainants and respondents are treated fairly and respectfully. Trinity Fire & Security will protect this privacy so long as doing so remains consistent with the enforcement of this policy and adherence to the law. Neither the name of the person reporting the facts nor the circumstances surrounding them will be disclosed to anyone whatsoever, unless such disclosure is necessary for an investigation or disciplinary action. Any disciplinary action will be determined by the Company and will be proportional to the seriousness of the behaviour concerned. Trinity Fire & Security will also provide appropriate assistance to any employee who is victim of discrimination or harassment.
Sexual Harassment Policy

Policy Intent

Trinity Fire & Security is committed to building and preserving a positive working environment for its employees. In pursuit of this goal, Trinity Fire & Security does not condone and will not tolerate acts of sexual harassment and/or related retaliation against or by any employee. As such, this policy:

- Provides general definitions for sexual harassment and related retaliation;
- Bans and prohibits sexual harassment and related retaliation; and
- Sets forth procedures for employees to follow when they feel a policy violation has occurred.

It is also a violation of Trinity Fire & Security’s Sexual Harassment Policy for anyone to knowingly make a false complaint of sexual harassment or to provide false information about a complaint. Individuals who violate this Policy are subject to disciplinary and/or corrective action, up to and including termination of employment.

Definitions

1. Appropriate Authority – Any delegated employee who has the authority to make final decisions regarding employees, harassment claims, and resulting actions. At Trinity Fire & Security, the Appropriate Authority is [name person or persons].

2. Complainant – A person who is or has been subjected to the alleged sexual harassment.

3. Respondent – Someone who's alleged conduct is the subject of a complaint.

4. Sexual Harassment – Defined as any interaction between individuals, regardless of gender, that can be characterized as unwelcome sexual advances or misconduct. This includes, but is not limited to:

- Requests for sexual favours;
- Verbal conduct of a sexual nature;
- Physical conduct of a sexual nature;
- Submission to sexual favours or conduct as being implied as condition of an employee’s employment;
- Implying that rejection of sexual advances will affect employment decisions regarding that individual;
- Creating a sexually intimidating or offensive working environment; or
- Creating a sexually degrading, humiliating, or hostile work environment. (Generally, a single sexual joke, offensive epithet, or request for a date does not constitute hostile environment sexual harassment; however, being subjected to such jokes, epithets, or requests repeatedly may constitute a hostile environment sexual harassment.)
5. **Retaliatory Acts** – Any retaliation, retribution, or reprisal by a Respondent against any Complainant who reports an incident of alleged sexual harassment, or against any employee who testifies or otherwise participates in an investigation or hearing relating to the allegation of sexual harassment.

**Policy and Procedures**

Individuals who believe they have been victimized by an act or acts of sexual harassment should report the incident(s) immediately to the Appropriate Authority. Any delays in reporting acts of sexual harassment can make the case against the Respondent more difficult to establish, and may even result in retaliatory acts by the Respondent.

**I. Report Obligations – Employees**

Employees who believe they are victims of sexual harassment in their working environment are advised to first respond to the alleged harasser directly, by objecting and by requesting that the unwelcome behaviour stop immediately. If this approach is unsuccessful, Trinity Fire & Security must be made aware of all acts of sexual harassment or retaliation in order to take the appropriate action. Thus, individuals who believe they have been subject to or have witnessed acts of sexual harassment or retaliation should report to the Appropriate Authority, or to their supervisor/manager. Delays in reporting may be unavoidable in some circumstances (to be determined on a case-by-case basis).

**II. Report Obligations – Supervisors & Managers**

Supervisors and managers are directed to take all appropriate steps to prevent and stop sexual harassment in their areas of responsibility. Any supervisor or manager who is subjected to, witnesses, or is given written or verbal complaints of sexual harassment acts or retaliation shall immediately report it to the Appropriate Authority. Delays in reporting may be unavoidable in some circumstances (to be determined on a case-by-case basis).

Supervisory personnel who are contacted by an individual that wishes to file a complaint of sexual harassment shall assist the complainant, and ensure that they are able to contact the Appropriate Authority.

**III. Investigation**

Trinity Fire & Security seeks to resolve sexual harassment claims as expediently as possible. Investigations shall be conducted and the appropriate actions taken no longer than 30 days following the filing of a complaint.
The Appropriate Authority is responsible for determining and administering the methods and means for addressing sexual harassment complaints. The Appropriate Authority is also responsible for:

- Determining the veracity of allegations of sexual harassment or retaliation.
- Determining whether or not a reported act is indeed sexual harassment.
- Resolving the dispute, with the agreement of both parties, where necessary.
- Administering punitive or corrective actions if allegations are true.
- Administering punitive actions if allegations were knowingly falsely made.

Wherever and whenever investigations are conducted, this Policy asserts that Complainants and Respondents certain rights. These rights include, but are not limited to:

- Receiving written notice of the allegations (where permitted by law).
- Presenting relevant information to the Appropriate Authority.
- Receiving a copy of the report at the conclusion of the investigation (where permitted by law).

At the conclusion of an investigation, the investigator shall prepare a written report which shall include a statement of factual findings and a determination of whether this Policy has been violated. The report shall be presented for review to law enforcement officials or legal counsel, as necessary.

IV. Report Handling Procedures
The Appropriate Authority shall advise the Complainant and the Respondent of the resolution of any investigation conducted under this Policy. A copy of the investigative findings shall be provided in writing to the Complainant and the Respondent.

In all cases, the Trinity Fire & Security’s Human Resources department shall retain the findings report for minimum of 3 years or for as long as any administrative or legal action arising out of the complaint is pending.

V. Confidentiality
All records of sexual harassment reports and subsequent investigations are considered confidential and will not be disclosed to anyone except to the extent required by law.

Trinity Fire & Security will do everything it can to protect the privacy of the individuals involved and to ensure that the Complainant and the Respondent are treated fairly and respectfully. Trinity Fire & Security will protect this privacy so long as doing so remains consistent with the enforcement of this Policy and adherence to the law.

VI. Assurance Against Retaliation
This Policy encourages employees to freely express – in a responsible and orderly fashion – their thoughts, opinions, and feelings regarding sexual harassment complaints. Retaliation by the Respondent or anyone acting on behalf of the Respondent, against the Complainant is strictly prohibited and will result in appropriate disciplinary action. Retaliation by the Respondent, or
anyone acting on behalf of the Respondent, against any witness providing information about a sexual harassment report, is also strictly prohibited. Acts of retaliation include (but are not limited to) interference, coercion, threats, and restraint.

This Sexual Harassment Policy will not be used to bring fraudulent or malicious complaints against employees. Any complaint made in bad faith, if demonstrated as being such through convincing evidence, will result in disciplinary action being taken against the individual lodging the fraudulent or malicious complaint.

VII. Procedures for Handling Complaints of Sexual Harassment

Once the Complainant lodges a complaint with his/her supervisor or the Appropriate Authority, a discussion will take place that shall be kept confidential, to the extent allowed by the law. If desired by the Complainant, no written record will be kept of this initial discussion. During this discussion, the recipient of the complaint will explain all options available to the Complainant. If the Complainant wishes to proceed further with his or her complaint, the Complainant must then provide a written statement regarding the alleged sexual harassment.

Informal Procedures

- If desired, the Complainant may attempt to resolve the matter directly with the Respondent. The Complainant must report the resolution, or lack thereof, to the Appropriate Authority.
- The Appropriate Authority may notify the Respondent of the complaint, keeping all such communication confidential. The Appropriate Authority may then implement whatever steps are necessary to create an informal resolution that is acceptable to both the Complainant and Respondent.
- If an informal resolution of the complaint is achieved, no record of the complaint will be entered in the Respondent’s personnel records. However, the Appropriate Authority will record the occurrence of the complaint and the informal resolution achieved. Again, this record will remain confidential.

Formal Procedures

- In the case of formal complaints, the Respondent shall have 60 working days to respond, in writing, to the allegation. The Respondent’s statement, written on company letterhead, must answer – with specific responses – to each complaint, either admitting, denying, or explaining the allegations against them. The Respondent must sign his or her statement, which will then be attached to the original complaint.

VIII. Disciplinary Actions

Upon concluding that an instance of sexual harassment has indeed occurred, the Respondent will be subject to disciplinary action, which may result in suspension of duties, or outright termination of employment. Disciplinary actions imposed by the Appropriate Authority will be determined on the basis of the facts of each case and the extent of harm to Trinity Fire & Security’s interests and business goals.
IX. Timelines
Complainants are always encouraged to file a complaint immediately after an alleged incident of sexual harassment. Nevertheless, Trinity Fire & Security is aware that such timely response may not always be possible, due to feelings of humiliation or fear on the Complainant’s part. Individuals who believe that they have experienced sexual harassment should lodge a complaint within 7 days following an alleged incident. Under extreme circumstances, this timeline may be extended to 15 days at the request of the Complainant; however, it is the responsibility of the Complainant to show good reasons for this extension.

X. Records
Records of all formal and informal resolutions, hearings, and reviews will be kept by the Human Resources department, except where otherwise stated in this Policy. The records will only be available to managerial members of the Human Resources department, and only in the following circumstances:

1. When determining an appropriate disciplinary action for subsequent sexual harassment complaints.
2. When a Respondent is a candidate for a promotion to a supervisory position.
3. When a complaint against retaliatory action is made.
4. When a decision or resolution is reviewed.

Any records concerning employees will be maintained in accordance with all applicable laws and regulations. Both the Complainant and the Respondent are eligible to obtain copies of hearings or of their own statements made throughout the course of the sexual harassment remediation process.

Anti-Bullying Policy

Intent

Trinity Fire & Security employees have the right to work free from harm and bullying in any form.

Harassment / Bullying Defined

Workplace harassment can be defined as any form of offensive/abusive treatment or behaviour that creates an intimidating, hostile, or abusive work environment.

Bullying

Bullying is an act of repeated, health-harming mistreatment, verbal abuse, or conduct which is threatening, humiliating, intimidating, or sabotage that interferes with work or some combination of the three in order to intentionally hurt another person, physically or mentally (Besag, 1989).
Harassment

- Behaviour that is hostile in nature, and/or intends to degrade an individual based on personal attributes, including age, race, nationality, disability, family status, religion, gender, sexual orientation, gender expression, gender identity and/or any other Human Rights protected grounds.
- Any actions that create a hostile, intimidating or offensive workplace. This may include physical, verbal, written, graphic, or electronic means.
- Any threats of physical violence that endangers the health and safety of the employee.

Harassment / Bullying Prohibited

Trinity Fire & Security will not tolerate harassment or bullying in the workplace. Any staff member that experiences harassment or bullying must report the activity to Human Resources.

**Trinity Fire & Security shall apply appropriate disciplinary actions for any and all incidents of harassment or bullying.**

Each staff member has a shared duty to ensure a workplace free from harassment and bullying.

Roles and Responsibilities

Management

- Promote a respectful and safe working environment;
- Ensure employee adherence to the Anti-Bullying Policy;
- Investigate complaints of bullying and/or harassment promptly;
- Maintain a confidential file for complaints of harassment or bullying, investigations completed and actions taken;
- Report the incident to police where appropriate;
- Apply appropriate disciplinary action where appropriate.

Employees

- Treat others with respect, and contribute to a respectful and safe work environment;
- Report all acts of bullying to management.

Disciplinary Actions

If the findings of the investigation indicate that a violation of the anti-bullying / harassment policy has occurred, immediate and appropriate corrective and/or disciplinary action, up to and including dismissal, shall be administered. Corrective actions shall be proportional to the seriousness or repetitiveness of the offense (an oral or written warning, training or counselling, monitoring the harasser, suspension, or dismissal may all be appropriate).
Health and Safety Discipline Levels

Intent

Trinity Fire & Security is committed to maintaining a safe and healthy workplace. Behaviour that is incompatible with that goal will be dealt with in a firm, fair and effective manner. Health and safety violations may require steps in the disciplinary actions to be skipped and more severe consequences to be taken.

Guidelines

- Trinity Fire & Security will implement progressive discipline process when dealing with employee conduct and policy violation issues.
- Health and safety issues are by their nature serious. As the situation dictates, based on the past performances of the employee, and the gravity of the violation, Trinity Fire & Security reserves the right to skip steps in the disciplinary process.
- When determining the severity of the disciplinary action chosen for an employee who has committed a health and safety violation, Trinity Fire & Security will take into consideration the following:
  - The number of violations on record for that employee
  - The length of employment for the employee
  - Any training completed by the employee
  - The severity of the violation
  - The employee’s level of responsibility
  - The intent of the action (if malicious intent was present)
  - The employee’s level of involvement
  - The outcomes of similar violations

Health and Safety Violations and Suggested Responses

The following table outlines required progressive discipline for common workplace issues.

**Key: Formal Disciplinary Actions**

V: Verbal warning;  
W: Written warning  
T: Termination of employment

Consideration will be given to the nature of incidents, factual details, the frequency of offences and the employee's overall work record prior to issuing any progressive discipline.

The following is a guideline for disciplinary actions for health and safety violations. This is to be used solely as a guide. Please note that not all situations are covered in the chart.
<table>
<thead>
<tr>
<th>Description</th>
<th>Violation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Health &amp; Safety Violations</strong></td>
<td>1st  2nd  3rd</td>
</tr>
<tr>
<td>Failure to follow organizational policies, practices and procedures that relate to the health &amp; safety of the organization and its employees *could be progressed depending on severity</td>
<td>V  W  T</td>
</tr>
<tr>
<td>Failure to wear the required personal protective equipment</td>
<td>V  W  T</td>
</tr>
<tr>
<td>Failure to follow management direction in a safety sensitive situation</td>
<td>V  W  T</td>
</tr>
<tr>
<td>Failure to report any workplace hazards or unsafe conditions</td>
<td>W  T</td>
</tr>
<tr>
<td>Failure to immediately report an accident on company premises or of company responsibility</td>
<td>W  T</td>
</tr>
<tr>
<td>Using company machinery or equipment without proper training or certification</td>
<td>W  T</td>
</tr>
<tr>
<td>Behaviour which could compromise the safety of yourself or others</td>
<td>W  T</td>
</tr>
</tbody>
</table>

**Summary**

This chart is meant to provide you with an example of unacceptable offences and the resulting violation. Depending on the severity of your action, management reserves the right to advance the progressive discipline to a higher level that fits the violation.

A progressive discipline warning will remain on file for eighteen (18) months. If no further violations happen during that period, the discipline will become inactive.
Health and Safety Program Orientation Checklist

Complete the Questionnaire to ensure and acknowledge understanding of the Health and Safety Program information discussed during orientation.

<table>
<thead>
<tr>
<th>Health and Safety</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>I have been shown and understand where to find a copy of the company safety policy.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I have been told and understand who the policy applies to.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I understand the content of the policy.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Hazard Assessment, Analysis and Control</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>The process for assessing hazards has been explained to my understanding.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I understand our job hazard assessment process and who is involved.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I have been informed and understand how to keep informed about new controls.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Safe Work Practices (SWPs)</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>I find the safe work practices easy to understand.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I understand where to get a copy of a safe work practice.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I know and understand the work safe practices associated with my role.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I understand my development and/or review of safe work practices.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Job Procedures (JPs)</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>My job procedures reflect what I do.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>My job procedures are easy to understand.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I have been shown where I can get a copy of company job procedures.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I was involved in the development and/or review of job procedures.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Company Rules</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company rules have been posted and explained to me.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I know and understand what the company rules say.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I understand the consequences of breaking the rules as they have been explained to me.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Personal Protective Equipment (PPE)</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>I have been taught and understand the PPE requirements.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I know who provides basic PPE.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I know who provides specialized PPE.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Preventative Maintenance

<table>
<thead>
<tr>
<th>Preventative Maintenance</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company procedures for managing broken or defective tools and equipment have been explained to me.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>I know and understand who provides maintenance and inspection of tools and equipment.</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

### Training and Communication

<table>
<thead>
<tr>
<th>Training and Communication</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>I completed the new hire orientation when I started here and/or the program orientation when the program was introduced.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>I received training for/on specific jobs.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>The employer holds regular health and safety meetings.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Senior management attends/participates in health and safety meetings.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Two-way communication exists during health and safety meetings.</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

### Inspections

<table>
<thead>
<tr>
<th>Inspections</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employees are involved in the inspections.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Identified deficiencies corrected promptly.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Results of inspections communicated to employees.</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

### Investigations

<table>
<thead>
<tr>
<th>Investigations</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>I know the process for accident investigations.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>I can define the process for reporting an accident.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>I report near misses.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>After an accident, changes/improvements are made in a timely manner.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>I am made aware of the outcomes of investigations.</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

### Emergency Preparedness

<table>
<thead>
<tr>
<th>Emergency Preparedness</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>I have been trained in emergency preparedness/response.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>I know the process for communicating in an emergency.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>I am aware of who is your first aid provider on site.</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

### Legislation

<table>
<thead>
<tr>
<th>Legislation</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>I have been shown where to find copies of applicable legislation.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>I understand my legislative rights and responsibilities.</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

### Supplementary

<table>
<thead>
<tr>
<th>Supplementary</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>We have a safety committee or representative.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>I know that the committee members have received or are required to receive training specific to their JHSC committee duties.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Fellow employees have confided in or consulted your JHSC committee and recommendations were made.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>I know how often the JHSC committee meets.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>I have concerns about the cleanliness of our bathroom/lunchroom.</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>
Acknowledgement & Agreement

I, ________________ (Employee Name), acknowledge that I have been trained in health and safety and have read and understand the Health and Safety Policy of Trinity Fire & Security.

Further, I agree to adhere to this Policy and will ensure that employees working under my direction adhere to these guiding principles. I understand that if I violate the rules/procedures outlined in this Policy, I may face corrective action, up to and including termination of employment.

Employee Name: ______________________________

Signature: ______________________________

Date: ______________________________

Manager: ______________________________