

 **WORK SAFE BC Visits**

Context

PCML operates a large and diverse collection of construction projects so it is a risk that WorkSafeBC Officers may identify conditions at one or more sites that are not in compliance with a specific section of the Act or OHS Regulation but are the result of significantly different circumstances. Officers may also impose an obligation on PCML (the prime contractor) that is more appropriately applicable to an individual employer. This can develop into a situation where PCML appears to be repeatedly not in compliance so it is important that every site approach an inspection by an Officer with a degree of cautious cooperation.

Preparation (Prevention)

Developing a good relationship with the local Officer for your project can help to keep issues at a discussion level, instead of becoming enforcement actions (i.e. Orders).

The best practice, and one that Polygon senior management fully supports, is once PCML takes over as the prime contractor for a project, contact the local Officer and invite them out for a meeting, preferably with representative of your main Trades. If you don't know the contact details for the local Officer, contact the **Safety Manager** for assistance in tracking them down.

Guideline

Here is what to do when a WorkSafeBC Officer visits your site.

1. Have the Officer complete a [Site Safety Orientation - All Workers](#)¹
2. Get the Officer's business card or, if they don't have available cards, their full name, email address, and phone number
3. Communicate to the **Safety Manager** that an Officer is on site and provide the Officer's contact information
4. Gather notetaking equipment and a camera
5. Accompany the Officer on an inspection of the site (ideally both Site Superintendent and CSO)
 - a. If the Officer takes a picture of anything on site, take the same picture
 - b. If the Officer comments on any condition on site, take a picture of the condition and make a note of the comments
 - c. Listen to the Officer's recommendations or suggestions, but refrain from taking any specific action to correct a condition other than to stop a specific task or restrict workers from an area
6. When the inspection is complete, the Officer should do a debrief with the **Site Superintendent** and the **CSO**
7. Before the Officer leaves the site, ask how many Inspection Reports they will be issuing, to which employers, and if any of those reports will include Orders

¹ Unless the Officer is responding to an incident. Emergency Response Workers responding to an incident (Police, Fire, Ambulance, WCB) do not require a Site Safety Orientation before entering the workplace. If the Officer is not responding to an incident and refuses to complete a Site Safety Orientation then continue with the inspection but make sure you let the Safety Manager know that the Orientation was refused.

8. Provide the Officer with contact information for the **Safety Manager** and request that they include the Safety Manager in any correspondence, including to other employers
9. Send a summary of the Officer's inspection, including any pictures, to the **Safety Manager** the same day
10. For any correspondence with an Officer, ensure that you Cc the **Safety Manager** and the **Site Superintendent**

Officers are people too

During the visit, remain polite and non-confrontational. Officers will likely identify conditions that need to be addressed or even stop work. They might provide guidance on how to address a condition based on their experience, but they do not have the authority to direct the specifics of how the condition is to be addressed unless those specifics are clearly written in the Act, Regulation, or Policy.

For example, an Officer may instruct that a worker must wear a seatbelt while operating mobile equipment ([OHS 16.5](#)), but they cannot direct "another effective means" to address the protection of workers on foot ([OHS 16.6\(2\)\(c\)](#)). The Officer may indicate that they consider the current means to be ineffective and request details on how an employer selected the current means, but they do not have the authority to instruct workers on what to do. (e.g. "You must put a mirror there".)

If in doubt about the instructions or directions that an Officer provides, the best course of action is to simply stop that specific task or restrict workers from an area until you can confirm the specific requirements of the Act, Regulation, or Policy and any employer documentation that pertains to the issue. The **Safety Manager** is there to assist in determining a course of action that will balance complying with the regulatory requirements and ensuring consistent coordination of activities relating to occupational health and safety.