



OCCUPATIONAL HEALTH PROGRAM

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Occupational Health Program

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1. Purpose

Concordia University's Occupational Health Program (OHP) allows for the prevention, early detection and monitoring of occupational illness and disease, and compliance with federal and provincial regulatory requirements.

The Occupational Health Program establishes the requirements for risk-based Occupational Health Screening.

2. Scope

The Occupational Health Program applies to all Members of the University Community participating in University Sanctioned Activities, both on and off University property, who have been identified as requiring enrollment in the OHP due to exposure or potential exposure to a hazard(s).

3. Occupational Health Program

3.1 Occupational Health Program Management

The University has established and maintains an Occupational Health Program (OHP) that complies with all federal, provincial and municipal legislation, and conforms to recognized codes and standards of practice.

Appropriate Occupational Health Screening is established based upon hazard specific regulatory requirements. In the absence of regulatory requirements, Environmental Health & Safety (EHS) evaluates the applicable standards of practice and occupational exposure limits to determine if Occupational Health Screening is required. In the absence of regulatory requirement or recognized standards, risk assessment is used to set Occupational Health Screening requirements.

Occupational Health Screening is targeted medical evaluations based upon regulatory requirements, applicable standards of practice and occupational exposure limits or risk assessment. Occupational Health Screening takes into consideration the potential health risks associated with exposure to hazards that are above levels stated in applicable regulations or permissible exposure limits. Occupational Health Screening may involve the completion of questionnaires, medical testing or examinations, or any other appropriate medical screening protocol.

Occupational Health Screening activities are conducted such that:

- Examinations and testing are performed by qualified/certified personnel;
- Sample analyses are performed by government approved laboratories, where required;
- Test results and records are interpreted by qualified/certified personnel;
- Medical privacy is in compliance with applicable privacy laws; and
- Medical opinions are rendered only by licensed health care providers (LHCP).

The Occupational Health Program is managed by Environmental Health & Safety.

3.2 Job Hazard Analysis

Job Hazard Analysis is the risk assessment process for identifying and evaluating exposure to hazards in order to protect the health and well-being of Members of the University Community and to comply with applicable regulatory requirements.

The Job Hazard Analysis takes into consideration all job tasks associated with a job position in order to identify all hazards that the employee may be exposed to during their work in order to determine if a significant health risk exists associated with the job position. The Job Hazard Analysis identifies Exposure Risks or Potential Health Risks.

The process of identifying hazards and determining exposure is referred to as an Exposure Assessment. Exposure Assessments evaluate the magnitude, frequency and duration of exposure and the routes of exposure via qualitative or quantitative methods. Job Hazard Analyses are conducted by EHS as part of the Exposure Assessment and Monitoring Program (EHS-DOC-0161).

The Exposure Assessment & Monitoring Program ensures that health risks associated with potential hazards in the workplace are systematically anticipated, recognized, evaluated, controlled, documented, and communicated to prevent exposures which may result in immediate or delayed work-related health effects or significant discomfort. As well, the procedure ensures compliance with applicable regulatory requirements.

3.3 Identification of Similar Exposure Group

EHS, in conjunction with Supervisors, identify employees who are part of a Similar Exposure Group with an identified Exposure Risk or Potential Health Risk. A Similar Exposure Group (SEG) is defined as any group of employees who are expected to experience the same magnitude, frequency and duration of exposure.

3.4 Occupational Health Screening Requirements

In response to cases where Exposure Risk(s) or Potential Health Risk(s) are identified for an SEG, EHS determines if Occupational Health Screening is required. For specific hazards, Occupational Health Screening is required by regulatory requirements or by current standards of practice.

When required, internal Occupational Health Screening Protocols are developed in consultation with the Occupational Health Physician.

3.5 Detection of Adverse Health Effects

If adverse health effects are detected during Occupational Health Screening, EHS initiates an investigation to determine the cause of the occupational exposure and initiates the necessary corrective actions to avoid further exposure. The investigation may include an assessment of the work place and/or exposure monitoring. The Occupational Health Physician is advised and may require additional medical diagnostics or expertise.

3.6 Occupational Exposure Data and Trends

Occupational Health Screening data will be evaluated to detect trends that may indicate the development of occupational disease or illness. If any adverse trends are identified, this information will be reviewed by the Occupational Health Physician and shared with the affected Members of the University Community, their Supervisors and Senior Management.

EHS will maintain metrics on the Occupational Health Program.

3.7 Fitness for Duty Evaluations

Fitness for Duty Evaluations ensure compliance with provincial regulations, supports management decision-making regarding employee hiring, and serves as a baseline for entry into the Occupational Health Program.

Fitness for Duty Evaluations are required for all preferred candidates prior to an offer of permanent or temporary employment for the University and who are required to work in areas where potential exposure or risk may exist, as determined by the Job Hazard Analysis.

Fitness for Duty Evaluations are conducted as per the *Fitness For Duty Evaluations* procedure (OHP-DOC-003).

4. Responsibilities

4.1 Individuals Enrolled in the Occupational Health Program

Individuals Enrolled in the OHP (referred to hereafter as Program Participants) are responsible for:

- a. Understanding the Occupational Health Program and associated Occupational Health Screening requirements applicable to their work, research and/or studies;
- b. Adhering to these requirements;
- c. Completing all required training;
- d. Providing required information to the Occupational Health Program Coordinator;
- e. Reporting to the Occupational Health Physician any medical or health condition (e.g. immunosuppressive medications, pregnancy, or illnesses that could compromise immune status) that could potentially change their risk if exposed to a hazard; and
- f. Complying with all necessary workplace and/or medical restrictions arising from Occupational Health Screening.

4.2 Supervisors

Supervisors are responsible for:

- a. Understanding the Occupational Health Program and associated Occupational Health Screening requirements applicable to their work, research and/or studies;
- b. Understanding their responsibilities with respect to the Occupational Health Program and associated Occupational Health Screening requirements;
- c. Assuming the costs associated with the Occupational Health Program and associated Occupational Health Screening requirements that are not covered by the University;
- d. Identifying employees and students who are part of a Similar Exposure Group (SEG) with an identified Exposure Risk or Potential Health Risk;
- e. Participating in the Job Hazard Analysis Program;
- f. Communicating all Occupational Health Screening requirements to affected individuals under their supervision;
- g. Participating in all required training and ensuring Program Participants have completed all required training;
- h. Ensuring participation in Occupational Health Screening of all Program Participants under their supervision; and
- i. Notifying the Occupational Health Program Coordinator when any individual under their supervision leaves the University (job transfers, termination, retirement, graduation).

4.3 Deans, Chairs and Senior Management

Deans, Chairs and Senior Management are responsible for:

- a. Providing the resources necessary to implement the Occupational Health Program and associated Occupational Health Screening in their areas; and
- b. Ensuring that all Supervisors collaborate with EHS in the application of the Occupational Health Program and associated Occupational Health Screening.

4.4 Health Services

Health Services is responsible for:

- a. Collaborating with EHS in the implementation of the Occupational Health Program and associated Occupational Health Screening;
- b. Notifying the Occupational Health Physician if adverse health effects are identified in any Member of the University Community;
- c. Ensuring all Occupational Health Screening-related activities performed by Health Services staff are conducted in accordance with professional standards and regulatory requirements;
- d. Ensuring that Health Services staff involved with the Occupational Health Program are qualified, as required by regulations and that those who perform Occupational Health Screening-related activities are appropriately trained to conduct consistent and complete procedures; and
- e. Complying with privacy laws.

Health Services provides access to available trained medical professionals and the appropriate equipment to carry out Occupational Health Screening. Health Services and EHS collaborate and have defined functions to provide and support Occupational Health Screening, as per the individual Occupational Health Screening protocols.

4.5 Human Resources

Human Resources staff is responsible for:

- a. Collaborating with EHS in the implementation of the Occupational Health Program and associated Occupational Health Screening;
- b. Adhering to the Fitness for Duty Evaluations procedure (OHP-SOP-005);
- c. Informing the Occupational Health Program Coordinator (EHS) of all new hires, job transfers, terminated and retiring employees; and
- d. Complying with privacy laws.

4.6 Occupational Health Physician

The Occupational Health Physician is responsible for:

- a. Providing expertise to EHS in the management of the Occupational Health Program;
- b. Determining the Occupational Health Screening requirements for each job position;
- c. Communicating Occupational Health Screening results to Program Participants;
- d. Communicating restrictions to Program Participants and their Supervisor;
- e. Ensuring Occupational Health Screening is conducted in accordance with professional standards;

- f. Reviewing educational material on the Occupational Health Program and Occupational Health Screening; and
- g. Recommending medical evaluation for exposed members of the community.

4.7 Occupational Health Program Coordinator (EHS)

The Occupational Health Program Coordinator is responsible for:

- a. Providing educational material on the Occupational Health Program and associated Occupational Health Screening to Members of the University Community;
- b. Tracking Occupational Health Program enrollment; and
- c. Complying with privacy laws.

4.8 Manager, Industrial Hygiene & Prevention (EHS)

The Manager, Industrial Hygiene & Prevention is responsible for:

- a. Coordinating the Occupational Health Program and associated Occupational Health Screening; and
- b. Implementing Occupational Health Screening consistent with regulatory and university requirements, for health hazards identified by EHS.

4.9 Environmental Health & Safety

Environmental Health & Safety (EHS) is responsible for:

- a. Managing the development and administration of the Occupational Health Program
- b. Developing and maintaining the associated OHP procedures and Occupational Health Screening Protocols in conjunction with the Occupational Health Physician, where appropriate, pursuant to regulatory requirements for those SEGs with an identified Exposure Risk or Potential Health Risk;
- c. Ensuring that the Occupational Health Program complies with federal, provincial and municipal legislations, recognized codes and standards of practice;
- d. Ensuring the services of an Occupational Health Physician are available for consultation, when required by the Occupational Health Program Coordinator or any to Members of the University Community, to discuss matters related to the Occupational Health Program;
- e. Conducting Job Hazard Analyses;
- f. Reporting trends in Occupational Health Screening outcomes;
- g. Developing and maintaining an Exposure Assessment and Monitoring Program for identifying potential health hazards;
- h. Communicating occupational health screening requirements to HR for the purpose of implementing prescribed pre-employment screening and/or fitness for duty evaluations;
- i. Overseeing the implementation of all Occupational Health Screening Protocols;
- j. Maintaining a list of positions requiring enrolled in the Occupational Health Program and associated Occupational Health Screening;
- k. Reviewing and monitoring compliance with the Occupational Health Program;
- l. When required, notify appropriate regulatory agencies of exposures to hazards; and
- m. Complying with privacy laws.

5. Occupational Health Program Enrollment Procedure

Enrollment in an Occupational Health Screening program is based on exposure risk. Once an Occupational Health Screening Protocols has been developed:

- a. EHS identifies the target population.
- b. The affected individuals and their Supervisors are advised of the new Occupational Health Screening Protocol and that they will be enrolled in the Occupational Health Program.
- c. All Supervisors who supervise Program Participants are provided with information on their responsibilities and information on Occupational Health Screening requirements by the Occupational Health Program Coordinator.
- d. All Program Participants are provided with information on their responsibilities and information on the Occupational Health Screening requirements by their Supervisor, in collaboration with the Occupational Health Program Coordinator.
- e. The Program Participants complete the occupational health screening requirements as per the Occupational Health Screening Protocol. If required, a licensed health care provider completes the specified health evaluations. Costs associated Occupational Health Screening Protocols are paid for by the University, unless specified otherwise in the protocol.
- f. Program Participants are notified of their Occupational Health Screening results and provided with counseling and/or referred for additional medical evaluations, as deemed appropriate.
- g. If routine screening is stipulated in the Occupational Health Screening Protocol, the Program Participant completes the occupational health screening requirements at the prescribe frequency.

6. Occupational Health Screening Protocols

The Occupational Health Program currently has the following established Occupational Health Screening protocols:

- i. Occupational Health Screening Protocol for Work Involving Human Blood, Bodily Fluids and Tissues (OHP-SOP-001)
- ii. Occupational Health Screening Protocol for Work Involving Biohazardous Materials (OHP-SOP-002)
- iii. Occupational Health Screening Protocol for Hearing Conservation (OHP-SOP-003)

The following protocols are in development:

- iv. Occupational Health Screening Protocol for Respiratory Protection Users (OHP-SOP-004)
- v. Occupational Health Screening Protocol for Individuals Exposed to Sewage (OHP-SOP-005)
- vi. Occupational Health Screening Protocol for Health Services (OHP-SOP-006)
- vii. Occupational Health Screening Protocol for the University Hazardous Materials Spill Response Team (OHP-SOP-007)
- viii. Occupational Health Screening Protocol for Work Involving Strong Magnetic Fields (OHP-SOP-008)

- ix. Occupational Health Screening Protocol for Work Involving Asbestos (OHP-SOP-009)
- x. Occupational Health Screening Protocol for Work Involving Lasers (OHP-SOP-010)

7. Program Evaluation

The Occupational Health Program must be evaluated routinely. The findings are documented and incorporated into program revisions. Occupational Health Screening Protocols are revised as needed.

8. Confidentiality & Recordkeeping

All Occupational Health Program and associated Occupational Health Screening records (e.g. Occupational Health Screening questionnaires, medical tests and examination results, interviews or reports from professionals, including licensed health care providers) are maintained and handled in accordance with Concordia University's privacy policies and provincial regulatory requirements.

All Occupational Health Program records, including Occupational Health Screening records, are considered occupational health files and are stored in the individual's occupational health file in Environmental Health & Safety. Occupational health files are kept confidential and retained as per the Occupational Health Files record retention schedule.

Any information learned about an employee through medical tests, examinations, interviews or reports from professionals, including licensed health care providers, will be kept confidential. For the purposes of preserving confidential information brought to their knowledge in the practice of their duties, all employees involved in the Occupational Health Program shall take the necessary measures to prevent the disclosure of such information that becomes known to them in the performance of their duties.

Any employee who is aware of a breach of confidentiality will report the breach immediately to the Director of EHS.

9. Definitions

Adverse Health Effect: Condition due to exposure in the workplace to a hazardous agent that causes measurable clinical pathology or clinically significant physiologic or pharmacologic changes.

Essential Function Questionnaire: A questionnaire whereby a supervisor identifies the physical demands and hazards associated with a job position.

Hazard: A stressor or agent that is a source of potential harm. Hazards can be chemical, physical and/or biological (e.g. noise, blood borne pathogens, respiratory protection, laser, and radiation).

Exposure Assessment: The process of identifying hazards and determining exposure to hazards by evaluating the magnitude, frequency and duration of exposure and the routes of exposure via qualitative or quantitative methods.

Exposure Risk: The increased likelihood of adverse health effects due to exposure to a given hazards, as determined through qualitative or quantitative assessment data and professional judgment. This term is used to identify hazards that require further assessment to determine the suitability of medical investigation and/or occupational health screening. Exposure Risks may be identified based on any of the following criteria:

- Employees' exposures, without regard to specific types of PPE, exceed the Action Level;
- Employees' exposures, without regard to specific types of personal protective equipment (PPE), exceed any applicable short-term exposure limits (STEL), excursions limits, or ceiling values;
- Employees have been inadvertently exposed due to inadequate or improper control measures or incidents (e.g., unacceptable exposures, unique skin absorption risk, frequent process upsets, etc.); or,
- Reported and documented employee health complaints/concerns associated with workplace exposures.

Health Services: On-campus and/or off-campus approved health care providers, including Concordia Health Services, licensed health care providers, and health care providers qualified to perform Occupational Health Screening according to Concordia University requirements and regulatory requirements.

Members of the University Community:

Employee - a person who under a contract of lease of personal service or contract of apprenticeship is hired to work full-time or part-time in a permanent or a temporary position at the University. Employees include faculty and staff.

Student - an individual who has contracted with and is registered at the University for an academic purpose.

Intern - Students performing an internship (with or without remuneration) for a company or an institution.

Occupational Health Screening: Targeted medical evaluations based upon regulatory requirements or Risk Assessment. Occupational Health Screening takes into consideration the Potential Health Risks associated with exposure to health hazards that are above levels stated in applicable regulations or permissible exposure limits. Occupational Health Screening may involve the completion of questionnaires, medical testing/examination or any other appropriate medical screening protocol.

Occupational Exposure Limit (OEL): Refers to the regulatory or recommended (i.e., consensus) restrictions placed upon exposure that are typically established to assure that exposure below these levels, results in no or minimal adverse health effects. The OEL is established for a specific time period which may range from 8-hours per day for a 40-hour week to instantaneous periods. To distinguish the reference time period for an established OEL, the OEL may be indicated as an OEL as an 8-hour Time-Weighted Average (OEL-TWA); an OEL as a short-term exposure limit (OEL-STEL); or an OEL as a Ceiling Value (OEL-C). OELs may be established or adopted by regulation or by a consensus group such as the American Conference of Governmental Industrial Hygienists' (ACGIH) Threshold Limit Values (TLVs. In the absence of a regulatory exposure limit, or where such limit exists, but is less restrictive than the ACGIH's Threshold Limit Values (TLVs), the TLV shall be used to determine the acceptability of exposures.

Potential Health Risk: A situation where workers experience adverse health effects that may be work-related; where inadequate or ineffective control measures are in place and employees' effective exposures exceed the occupational exposure limit; or where exposure is deemed to be unacceptable.

Program Participants: Members of the University Community enrolled in the Occupational Health Program

Risk: Chance of something happening that will have an impact, measured in terms of consequence and likelihood.

Risk Assessment: The overall process of risk identification, risk analysis and risk control. Exposure assessments are a component of risk assessments.

Similar Exposure Group: Any group of employees who are expected to experience the same magnitude, frequency, and duration of exposure.

Supervisor: an individual overseeing the work, research or studies of a Member of the University Community, with or without remuneration

University Sanctioned Activities: working, research, studying, working as an intern, and/or volunteering.