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Consider the Risks

The spread of COVID-19 increases in situations involving close interactions with others, in closed spaces, and crowded places. The chances of COVID-19 spreading during these activities depends on the number and characteristics of people who attend (e.g., age, maturity, physical ability, comprehension), proximity, length of the interactions between people, as well as the prevention measures put in place by employers.

Introduction

In Canada, the COVID-19 pandemic has created an unprecedented challenge that has changed the way we work and live.

In many cases, workers have been working from home or not working at all. As COVID-19 cases decline and vaccination rates increase, businesses are reopening, and many workers are or will be returning to the workplace.

This document provides an introduction for employers and workers on returning to the workplace. General recommendations are outlined for providing mental health support, implementing a workplace accommodation program, and addressing fatigue and substance use as it relates to COVID-19.

In all cases, meet your legal occupational health and safety obligations by doing everything reasonably possible under the circumstances to protect the health and safety of your workers. Follow guidance provided by your local [public health authorities](#), the [Public Health Agency of Canada \(PHAC\)](#), and your [jurisdictional OHS regulator](#).

For general COVID-19 prevention practices, refer to these CCOHS documents:

[Protect Yourself and Others from COVID-19](#),
[COVID-19 Health and Safety Planning for Employers](#),
[COVID-19 Prevention for Workers](#), and,
[COVID-19 Health and Safety Resources](#).

Considerations When Assessing Risk

Each workplace is unique. Employers should continue to work with their health and safety committee or representative (if applicable) to identify [hazards](#) and conduct a [risk assessment](#). They could also use [available tools](#) from PHAC.

Identify activities where workers are in close contact with others (2 metres), in crowded places, indoor closed spaces with poor ventilation, and in activities requiring forceful exhalation (heavy labour, speaking loudly, etc.), and with objects touched by others. Include all services provided by third parties (e.g., cleaning, maintenance, vending machine service, uniform providers, etc.).

COVID-19 [spreads](#) primarily through close contact of infected people with others. Infection can occur when viruses, inside respiratory droplets or aerosols, are inhaled or come in contact the eyes, nose, or mouth of an uninfected person. The COVID-19 virus may also spread when a person touches another person (e.g., a handshake) or a surface of an object (also referred to as a fomite) that has the virus on it, and then touches their mouth, nose or eyes with unwashed hands.

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Consider the personal risk factors of your workers and how they might impact the risk and potential control measures when returning to the workplace. For example, do you have any workers with known pre-existing medical conditions that put them at higher risk for severe disease or outcomes? Do any of your workers live together, carpool or take public transit to work? Is there language, socio-economic, or other accessibility barriers to assess?

Considerations When Implementing Control Measures

Once the hazards and risks of COVID-19 have been identified and evaluated, implement appropriate [hazard controls](#) using the [hierarchy of controls](#): elimination, substitution, engineering, administrative, and personal protective equipment (PPE). Continue to use a layered approach that includes multiple [personal preventive practices](#) in your safety control plan, adjusting the plan as local [public health measures are lifted](#). Also ensure that no new hazards will be created as a result of any new control measures.

For additional information about controls to implement at the workplace, please refer to the CCOHS resource "Returning to the Workplace After Easing of COVID-19 Restrictions".

Evaluate and Update Your Hazard Control Plan

Continue to evaluate how effective your hazard controls are and make changes if needed.

Talk with your workers, observe your workplace, and continue to review your workplace inspection and any incident reports to identify what is working well and what improvements are needed.

Address all ineffective measures. Be prepared to update your workplace health and safety program and policies if work processes change, if community rates of COVID-19 transmission increase, or as public health advice changes. Re-instating personal preventative practices in a layered approach may also be required.

Update, post and retrain your workers as needed.

Considerations When Preparing Workers to Return to the Workplace

Once hazard controls are in place, plan how to prepare and support your workers for their return to the workplace.

Communication and Training

- Develop a communication strategy using multiple methods to provide information, receive feedback, and to encourage discussion with all workers.
- Contact your workers as far in advance as possible before the date of their expected return to the workplace.
- Review the COVID-19 safety plan before workers arrive on site and discuss how they will be expected to follow it.
- Include information on any reduced or suspended services and restricted access.
- Discuss any anticipated changes in how work activities will be performed. Identify how workers will be trained before performing new or modified work tasks.
- Provide refresher training on the occupational health and safety [rights](#) and [responsibilities](#) of employers, supervisors and workers with your workforce.
- Inform all workers of new and updated policies and procedures (e.g. leaves of absence, accommodation, fatigue, substance use, etc.). Include information about any financial assistance available through the employer and [government](#).
- Discuss the benefits of COVID-19 vaccination with your workers. For current information on the vaccines authorized for use and how to register, please refer to the Government of Canada website, [Vaccines for COVID-19](#).
- Ensure information is readily accessible and in languages to best support your workforce. Use credible and [trusted sources](#) including the [Public Health Agency of Canada](#) and your local public health authority.

Screening

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Continue to encourage workers to stay home if they are sick or might be sick with COVID-19. Follow [self-assessment](#) steps from your provincial or territorial public health authority, a [checklist](#), or have a designated person ask direct questions before people enter the workplace.

If readily available and feasible, consider implementing routine [rapid testing](#) of all consenting workers as an additional active screening measure. Consider how you will [manage the response](#) to a rapid test result.

Anyone who does not pass screening should not enter the workplace, should immediately wear a mask (preferably a respirator or medical mask, if not available a well-constructed and well fitting non-medical mask), return home while avoiding public transit, contact their health care provider or local public health authority, if required.

Develop procedures for [responding to a suspected or confirmed COVID-19 case](#), including contacting local public health authorities for further advice. If the case is work-related, additional notifications may be required (e.g., the [jurisdictional health and safety regulator](#) and [worker compensation board](#) for your province or territory).

Complete an incident report and begin an investigation.

Contact Tracing

Consider keeping a record of the names and contact information for your workers, contractors and essential visitors who enter your workplace for contact tracing purposes, in accordance with local public health requirements. Information should include their name, phone number and/or email, the date and time they entered the building, and what section or area of the building they visited.

Keep contact tracing information only for as long as needed (e.g., 30 calendar days). Maintain confidentiality and ensure the information is gathered, used, stored and destroyed in accordance with your [privacy laws](#).

Policies and Procedures

Review workplace policies and procedures to ensure they meet legislative compliance and incorporate best practices. Build flexibility into your programs. Continue to maintain worker confidentiality and follow your [privacy laws](#).

Workplace Absences

Provide scheduling and financial support for workers to attend vaccination clinic appointments. Involve your human resources professionals and obtain a legal opinion as to whether proof of vaccination will be required to pay workers for being off from work.

Adopt flexible leave policies that enable sick workers to stay home. Continue to communicate to workers that they should not come into work if they feel sick, no matter how mild their symptoms. Ensure your policies comply with the minimum requirements of the employment standards legislation in your jurisdiction.

Support workers who must take a leave of absence to isolate, quarantine, or to take care of family members. Contact your jurisdictional Occupational Health & Safety (OHS) [regulator](#) to determine what supports are available (e.g. [COVID-19: Support for workers \(Ontario\)](#)).

Provide information on [government assistance](#) programs available to individuals.

Workplace Accommodation Related to COVID-19

Under human rights legislation, Canadian employers have a legal [duty to accommodate](#) a person who may be discriminated against because of that person's race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, disability and, or conviction for an offence for which a pardon has been granted.

An accommodation means that workspaces, practices, rules, or policies may need to be adjusted to enable a worker to fully participate.

While each accommodation must meet the needs of the person, the accommodation does not need to be perfect, it only needs to be reasonable.

Employers must accommodate up to the point of undue hardship (significant expense, impact to health and safety).

Many workplace accommodation requests are due to a worker's disability. A disability could be a physical and/or mental injury, illness or addiction that prevents the worker from continuing to do their job as they did before.

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Workers or their families may be at risk of severe illness because they belong to a [high-risk group](#). These include adult over age 60, people of any age with chronic medical conditions (e.g., high blood pressure), people of any age who are immunocompromised (e.g., living with cancer) and people living with obesity.

Update your accommodation policies and procedures to ensure they reflect the support required for workers protected under human rights legislation including those with short term, chronic and episodic conditions. Include an action plan on how to respond to sudden exacerbations.

Identify accommodation options available within your workplace. Make existing facilities readily accessible, offer transportation, restructure jobs, offer re-assignment, modify work and break schedules, obtain or modify equipment, devices, and software. Provide flexible time for workers to attend medical appointments. Changing a workspace, lighting and noise levels can all help improve mental health, concentration, and wellbeing. Consider whether workers can continue with remote work. Provide leaves of absence for workers undergoing treatment or other COVID-19 related absences in accordance to legislation, and union agreements if any, without fear of reprisal.

Remember that requests for accommodations should be made in good faith and every effort should be made to accept the request. However, information might be needed from the worker's health care provider to identify the worker's functional abilities.

Do not ask for a diagnosis or information regarding treatment. Do ask for information about the current functional abilities of the worker.

Sharing completed job descriptions and assessments with the health care professional can be helpful in determining the best fitness for work status. Focus on current abilities and functionality as well as the needs of the organization.

Promote a collaborative approach with all relevant workplace parties (e.g., worker, supervisor, healthcare provider) to determine what accommodation is needed to best support the individual.

For additional information on Workplace Accommodation refer to CCOHS's OSH Answers Fact Sheet: [Mental Health - Return to Work](#).

Workplace Mental Health

Many Canadians are experiencing increased stress, fear, anxiety, isolation, and other challenges during the COVID-19 pandemic. These emotions may continue or even increase as people return to the workplace.

Signs and symptoms of worsening mental health can vary among individuals but can include feeling irritated, angry, anxious, tired, sad, overwhelmed, unmotivated and burned out. Workers may have trouble concentrating on their job tasks.

Work factors that might impact mental health include concerns about the risk of being exposed to the virus at work, taking care of personal and family needs while working, managing a different workload, or adapting to a different workspace or work schedule.

Understanding what the true concerns are for returning to the workplace can help you implement appropriate controls. Creating a psychologically safe workplace can help support workers work through these concerns. As defined by the [CSA Standard Z1003-13 \(R2018\) Psychological Health and Safety in the Workplace](#), a psychologically healthy and safe workplace is a "workplace that promotes workers' psychological well-being and actively works to prevent harm to worker psychological health including in negligent, reckless, or intentional ways."

There are known [organizational factors](#) that can impact an individual's mental health -positively or negatively. Striving to address these factors to create and foster a workplace that promotes a culture that balances work, life, safety, health, and wellness will help ease COVID related anxieties.

Consider whether sending worker surveys would be helpful in identifying concerns that can be addressed before workers return to the workplace.

Educate and train supervisors and workers to recognize [good mental health](#). Ensure managers and supervisors are well-informed on how to recognize and support workers. Have them check in daily with their workers.

Encourage workers to report any health and safety concerns to their supervisor or employer. They can also speak with their health and safety committee, representative, or union.

Organize tasks and activities that help workers develop a consistent daily routine Promote regular breaks from work to stretch and check in with coworkers.

Provide a physically safe work environment and encourage workers to actively participate in healthy lifestyle choices.

Promote the use of your employee assistance program (EAP), and provide [mental health resources](#), anti-discrimination information, and resources on preventing [stigma](#) and [burnout](#).

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For more information, visit the following CCOHS documents:

[Mental Health - Psychosocial Risk Factors in the Workplace](#),
[Workplace Health and Well-Being- Comprehensive Workplace Health and Safety Program](#),
[Mental Health- How to Address and Support](#).

COVID-19 and Workplace Fatigue

The COVID-19 pandemic has required many essential workers to work longer hours, more shifts, or overnight shifts leaving less time to sleep and recharge. Long work hours and shift work combined with stressful or physically demanding work can lead to poor sleep and increased fatigue. Some workers who contracted COVID-19 may continue to experience ongoing symptoms, including fatigue, weeks and even months after contracting the virus.

Identify all the factors associated with fatigue that may impact your workplace. Assess shift rotation patterns, balanced workloads, timing of tasks and activities, availability of resources, and the workplace environment (e.g., lighting, ventilation, temperature, etc.). Include mental fatigue, such as mental workloads, demanding mental activities or stress, long periods of anxiety, or long periods of monotonous tasks in your assessment.

Recognize that the signs and symptoms of fatigue can vary among individuals but can include tiredness, irritability, reduced alertness, concentration and memory, lack of motivation, and giddiness. Fatigue can lead to loss of appetite, depression, digestion problems, and increased susceptibility to illness.

Fatigue can lead to many negative outcomes including reduced decision-making ability or cognitive processing, reduced communication skills, productivity, and performance.

Fatigue increases the risk for injury and deteriorating health including infections, illnesses, and mental health disorders.

To help manage workplace fatigue employers could develop administrative practices such as maximum hours of service, appropriate shift rotation, extended workdays to allow more days off, reducing or eliminating the need to do high risk activities between certain hours (e.g., between the hours of midnight and 6 a.m.).

If possible, offer a variety of tasks that vary in interest and in movement throughout the shift or rotate workers through tasks that are repetitive and/or strenuous.

If rotating shift work is needed, use forward rotations (day to evening to night) and provide workers with sufficient notice when scheduling, particularly if there is a shift change. Avoid scheduling workers for more than 12 hours, if possible.

Educate and train about fatigue, including recognizing signs and symptoms of fatigue, and how to gauge alertness. The [Epworth Sleepiness Scale](#) is a short survey that can be posted in a common area for workers to quickly rate their fatigue. Develop a procedure that supports rather than punishes a worker for reporting when they or a co-worker are too fatigued to work safely.

Provide information for workers on the consequences of sleep deprivation and resources to assist them in managing fatigue, including [how to get better sleep](#).

Encourage regularly scheduled breaks in clean and safe areas.

Provide alternative transportation to and from work and mandatory paid rest time prior to driving commutes after work when possible.

For additional information on workplace fatigue refer to CCOHS's Fact Sheet: [Fatigue](#).

Workplace Impairment - Substance Use

One of the indirect impacts of the COVID-19 pandemic in Canada is a possible increase in the use of prescription drugs, alcohol, cannabis, opioids, and illegal drugs to cope with the stress of the pandemic.

While it is not the role of a supervisor or employer to diagnose a medical issue, or possible substance use or dependency problem, they are responsible to identify a worker who appears to be impaired, and to take the appropriate actions to keep the workplace safe.

To help manage issues of impairment, employers should develop policies and procedures to help educate and provide support to workers impacted by substance use and abuse.

Include a statement of commitment to promote an inclusive, supportive work environment by treating all workers with respect, helping workers seek assistance, and encouraging de-stigmatization.

Educate and train supervisors and workers on recognizing signs and symptoms of impairment.

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Develop a procedure that supports rather than punishes a worker for reporting when they or a co-worker are or appear to be impaired.

Provide information for workers on the consequences of impairment and resources to assist them including any accommodation and progressive discipline policies and procedures.

For additional information on workplace impairment refer to CCOHS's Tip Sheet: [Impairment and the COVID-19 Pandemic](#).

If you or someone you know is in crisis, please contact your local hospital, call 911 immediately, or contact a [Crisis Centre in your area](#).



It is important that mental health resources and support are provided to all workers, including access to an employee assistance program, if available.

For further information on COVID-19, refer to the [Public Health Agency of Canada](#).

Note that this guidance is just some of the adjustments organizations can make during a pandemic. Adapt this list by adding your own good practices and policies to meet your organization's specific needs.