CanadaLockers

Canada Locker Systems Inc. | Vancouver, BC

Tenant Storage & Bike Locker Installation

HEALTH AND SAFETY MANUAL

Prepared for sub-trade installation crews

Covers site installation of prefabricated steel-and-mesh storage and bicycle locker systems in parkades, storage rooms, and amenity spaces

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Applies To	All employees and subcontractors performing work on behalf of Canada Locker Systems Inc.

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1. Introduction and Purpose

Canada Locker Systems Inc. is committed to providing a safe and healthy workplace for every worker, subcontractor, and visitor involved in the delivery and installation of our tenant storage and bicycle locker systems. This manual sets out the health and safety program, rules, and procedures that apply to all site installation work performed on behalf of Canada Lockers.

This manual exists to protect people first, and to meet our legal duties as an employer/prime contractor (or subcontractor, depending on project role) under applicable occupational health and safety legislation.

1.1 Scope

This manual applies to all Canada Lockers employees, contract installers, and subcontracted crews performing:

- Delivery, staging, and handling of prefabricated steel-frame/welded-wire-mesh locker panels, doors, ceilings, transoms, and bike racks
- Layout, anchoring, and assembly of locker systems in underground parkades, storage rooms, and amenity spaces
- Fastening of panels and frames to concrete floors, walls, and ceilings (including drilling and mechanical anchoring)
- Cutting, trimming, or field modification of mesh, steel angle, or panel components
- Site cleanup and demobilization

It does not cover locker manufacturing/factory operations, which are addressed in a separate factory health and safety program.

1.2 How This Manual Is Used

Every worker must receive a site orientation and a review of this manual before starting work. Supervisors must keep a copy (paper or electronic) accessible on every job site, along with site-specific hazard assessments, permits, and emergency contact information.

2. Health and Safety Policy Statement

Canada Lockers regards the health and safety of our workers, our clients' site personnel, building occupants, and members of the public as being of primary importance to our business. We will not knowingly compromise the health and safety of any person for production, cost, or schedule.

Management is accountable for:

- Establishing and maintaining this health and safety program
- Providing the equipment, training, and resources necessary to work safely
- Ensuring hazards are identified and controlled before work begins
- Investigating all incidents and near misses, and correcting root causes
- Enforcing compliance with this manual and applicable OHS legislation

Every worker is responsible for:

- Working in compliance with this manual, site rules, and the law
- Using and maintaining required PPE and safety equipment
- Reporting hazards, incidents, and near misses immediately
- Refusing unsafe work and reporting the refusal to a supervisor

Signature:

3. Roles and Responsibilities

3.1 Management / Employer

- Develop, resource, and maintain this health and safety program
- Ensure site supervisors are competent and trained
- Ensure a written Exposure Control Plan is in place for silica-generating tasks (Section 7)
- Ensure incidents are reported to the applicable regulator as required by law
- Review and update this manual at least annually or after any significant incident

3.2 Site Supervisor / Foreman

- Conduct or delegate a Field Level Risk Assessment (FLRA) before work begins each shift
- Coordinate with the general contractor / site host on access, permits, and site-specific rules
- Confirm workers have required PPE, training, and orientation before starting work
- Stop work immediately when an unsafe condition is identified
- Report and investigate incidents, near misses, and worker safety concerns
- Conduct regular site inspections and keep documentation on site

3.3 Workers

- Follow this manual, site-specific rules, and safe work procedures
- Use PPE and safety equipment correctly and keep it in good condition
- Participate in the FLRA process and raise attention to hazards as they are identified
- Report all incidents, injuries, and near misses to the supervisor immediately
- Exercise the right to refuse unsafe work without fear of reprisal

3.4 Joint Health and Safety Committee / Worker Representative

Where the workplace or project meets the applicable worker-count threshold for a Joint Health and Safety Committee, Canada Lockers will establish and support that committee in accordance with the applicable legislation.

4. General Site Rules

4.1 Site Orientation

All workers, including subcontractors, must complete the General Contractor's site-specific orientation before starting work. Orientation must cover: site access and sign-in procedures, emergency procedures and muster points, known site hazards, other trades working in the area, washroom/first aid locations, and the general contractor's site rules (where applicable).

4.2 Personal Protective Equipment (PPE)

Minimum PPE for locker installation work:

PPE Item	Requirement
CSA-approved hard hat	Mandatory at all times on active construction sites and in parkades under construction
Safety glasses / eye protection	Mandatory during drilling, cutting, grinding, or handling of mesh/steel
Cut-resistant gloves	Mandatory when handling welded-wire mesh panels and cut steel edges
CSA-approved safety footwear	Mandatory at all times (steel or composite toe, puncture-resistant sole)
High-visibility vest/clothing	Mandatory in parkades with vehicle traffic or shared work areas
Hearing protection	Mandatory when using drills, grinders, or cut-off tools for extended periods
Respiratory protection	Mandatory per the Silica Exposure Control Plan — see Section 7

Supervisors must confirm that all required PPE is available, fits correctly, and is inspected before use. Damaged PPE must be replaced immediately. Repair is not allowed.

4.3 Housekeeping

- Keep walkways, exits, and fire access routes clear of tools, materials, and debris
- Stage panels, doors, and mesh flat or securely leaned/racked against a wall — never freestanding where they could tip
- Remove or cap sharp edges and protruding fasteners as work progresses
- Clean up metal shavings, offcuts, and packaging debris at the end of each shift

4.4 Coordination with Other Trades / General Contractor

Locker installation frequently occurs alongside other active trades in occupied or partially occupied buildings. Supervisors must confirm daily with the general contractor or building representative: current site hazards, permits required (hot work, confined space, etc.), and any building-specific rules (elevator use, resident access, noise restrictions).

4.5 Right to Refuse Unsafe Work

Every worker has the right to refuse work they have reasonable grounds to believe is unsafe to themselves or others. Workers must report the refusal to their supervisor immediately. No worker will face discipline or reprisal for a good-faith refusal of unsafe work.

5. Hazard Identification and Risk Assessment

5.1 Field Level Risk Assessment (FLRA)

A Field Level Risk Assessment must be completed by the crew, with the supervisor, before starting work each shift and whenever the scope, location, or conditions change. The FLRA must identify:

1. The tasks to be performed
2. Hazards associated with each task (see Section 6 for locker-installation-specific hazards)
3. Controls to eliminate or reduce each hazard
4. Who is responsible for each control

A blank FLRA form is provided in Appendix A. Completed forms must be kept on site and made available to workers and, on request, to the regulator.

5.2 Hazard Reporting

Any worker who identifies a hazard must report it to their supervisor immediately. Supervisors must address the hazard before work continues in the affected area and document the hazard and the corrective action taken.

6. Task-Specific Hazards — Locker Installation

6.1 Working in Parkades and Storage Rooms

- Confirm adequate lighting before starting work; supplement with temporary task lighting if needed
- Confirm ventilation is adequate, particularly where power tools, vehicles, or dust-generating work are present — mechanically ventilated or naturally poorly-ventilated parkades can allow dust and exhaust to accumulate
- Be aware of low headroom, sprinkler piping, conduit, and other overhead services when moving panels or ladders

6.2 Manual Material Handling

Locker panels, doors, and ceiling sections are large, awkward, and can be heavy. Sharp cut wire ends and steel edges present cut hazards.

- Use proper lifting technique: bend at the knees, keep the load close, avoid twisting while lifting
- Use a two-person or mechanical lift (panel cart, dolly) for any panel that is long, wide, or awkward to carry alone
- Wear cut-resistant gloves when handling mesh panels or cut steel
- Do not lean panels against unsecured surfaces where they could fall or slide

6.3 Working at Height

Installing ceiling panels, transoms, and upper fasteners may require a step stool, step ladder, or podium ladder.

- Use only CSA/ANSI-rated ladders or podium steps in good condition; inspect before each use
- Maintain three points of contact when climbing; do not stand on the top step or top cap of a stepladder
- Where work is at height that meets the jurisdiction's fall-protection trigger height (3 m / 10 ft) or where a fall hazard exists regardless of height, a fall protection plan and appropriate fall protection equipment is required.
- Do not use locker frames, panels, or racking as a makeshift ladder or work platform

6.4 Anchoring and Drilling into Concrete

Locker frames are typically anchored to the building's concrete slab, walls, or ceiling using mechanical or adhesive anchors installed with a hammer drill. This is the primary source of silica dust exposure on our sites — see Section 7 for the full control program.

- Confirm anchor type and embedment depth, and installation technique per the anchor manufacturer's instructions
- Locate embedded rebar, conduit, or post-tension cables before drilling — request as-built drawings or use a scanner where available; never drill blind into post-tensioned slabs

6.5 Power and Hand Tool Use

- Inspect tools, cords, and batteries before each use; tag out and remove damaged tools from service
- Use the guard supplied with cut-off tools/angle grinders; never remove or defeat a guard
- Use eye and hearing protection whenever cutting, grinding, or drilling
- Disconnect/de-energize tools before changing bits, blades, or discs
- Secure cords and hoses out of walkways to prevent trip hazards

6.6 Electrical Safety

- Use only GFCI-protected outlets or portable GFCI devices for corded power tools
- Inspect extension cords for damage before use; do not use cords with cut, cracked, or taped insulation
- Keep cords and tools clear of standing water, common in below-grade parkades

6.7 Sharp Edges and Cuts

- Handle cut mesh and steel angle with cut-resistant gloves
- Deburr or cap cut edges where practical, especially at heights accessible to building occupants
- Dispose of offcuts and wire scraps in a designated sharps-safe container, not loose in general waste

7. Silica Safety and Dust Control

7.1 The Hazard

Concrete, block, and mortar contain crystalline silica. Drilling, hammer-drilling, cutting, or grinding these materials to install anchors generates respirable crystalline silica (RCS) dust — particles small enough to lodge deep in the lungs. Repeated exposure can cause silicosis (irreversible lung scarring), is linked to lung cancer, chronic obstructive pulmonary disease (COPD), and kidney disease, and crystalline silica is classified as a human carcinogen. There is no safe level of unprotected long-term exposure, and damage can occur without immediate symptoms.

7.2 When This Applies to Locker Installation

On Canada Lockers installation projects, the main silica-generating task is hammer-drilling anchor holes into concrete floors, walls, or ceilings to fasten locker frames and start frames. Other tasks that can generate silica dust include:

- Drilling or coring through concrete or masonry for conduit, sleeves, or anchors
- Cutting or grinding concrete, block, or mortar (uncommon on locker installs, but may occur for slab patching or modification)
- Sweeping or blowing down concrete dust with compressed air

This section does not apply to drilling or cutting steel, aluminum, or the locker's own mesh/panel components, which do not contain crystalline silica — but note that cutting steel can still generate metal dust/fume requiring its own controls (Section 6.5).

7.3 Regulatory Basis

This program is based on the requirements of the applicable OHS regulator (e.g. WorkSafeBC Occupational Health and Safety Regulation, Part 6 — Substance Specific Requirements, and applicable exposure limits under the OHSR). Requirements may differ by jurisdiction and must be confirmed for each project location; consult the current regulation rather than relying solely on this manual.

7.4 Hierarchy of Controls

1. Elimination / Substitution

- Use pre-drilled connection points or cast-in anchors where the building design allows, avoiding field drilling entirely
- Where possible, specify adhesive anchor systems or fastening methods that reduce the number or depth of holes required

2. Engineering Controls (primary control for drilling tasks)

- Use a hammer drill fitted with an on-tool dust extraction shroud connected to a HEPA-filtered (H-class) vacuum for all concrete anchor drilling — this is the standard method and must be used whenever available
- Where dust extraction is not feasible for a specific hole, use a wet drilling/wet cutting method to suppress dust, only where the tool and application support it

- Maintain and empty HEPA vacuums per manufacturer instructions; a full or clogged filter reduces effectiveness

3. Administrative Controls

- Limit the number of workers in the immediate dust-generating area to those performing the task
- Rotate tasks among crew members to limit individual exposure duration where high hole counts are required
- Schedule high-drilling-volume tasks to allow the extraction system to be set up and used properly rather than rushed
- Never dry sweep or use compressed air to clean up concrete dust — use a HEPA vacuum or wet cleanup method only

4. Respiratory Protection (used in addition to, never instead of, engineering controls)

- Where dust extraction is used and functioning correctly for anchor drilling, a fit-tested N95 (or better) respirator is the minimum requirement
- Where dust extraction is not available or is not functioning, drilling must stop until it is restored, or workers must upgrade to a half-face respirator with P100 filters and increase administrative controls
- Respirators must be fit-tested annually and workers must be clean-shaven where the respirator seals against the face
- Respirator use requires a written respiratory protection program per the applicable OHS regulation

7.5 Written Exposure Control Plan

Canada Lockers maintains a written Silica Exposure Control Plan covering: identification of tasks and workers exposed, the specific controls required for each task, training requirements, exposure monitoring (where indicated), respirator fit testing, and a schedule for review. Supervisors must confirm the current Exposure Control Plan is on site and followed for every project involving concrete drilling.

7.6 Training

All workers performing or working near concrete drilling must complete silica awareness training before performing the work, covering: the health effects of silica exposure, the tasks that generate it, the required controls, correct use and maintenance of dust extraction equipment, and correct respirator use, fit, and limitations.

Stop Work Trigger:
If dust extraction equipment fails, is unavailable, or visible dust clouds are being generated during drilling, stop the task immediately, notify the supervisor, and do not resume until proper controls are restored.

8. Chemical Safety (WHMIS 2015)

- All hazardous products on site (adhesive anchor epoxy, cleaners, sealants, etc.) must be properly labeled and accompanied by a current Safety Data Sheet (SDS)
- SDS binder (paper or electronic) must be accessible to all workers on site
- All workers must complete WHMIS 2015 training before working with or near controlled products
- Follow SDS storage, handling, and disposal instructions for any adhesive anchor systems or chemical products used

9. Fire Safety and Emergency Response

9.1 Emergency Preparedness

- Confirm the location of the nearest fire extinguisher, first aid kit, and emergency exit at the start of each shift
- Confirm cell reception or an alternate communication method is available in below-grade work areas
- Record site-specific emergency contact numbers on the FLRA or post at the work area (Appendix E)

9.2 First Aid

- A stocked first aid kit appropriate to the crew size and work location must be on site at all times
- At least one worker with current first aid certification appropriate to the jurisdiction's requirements must be present on site
- All injuries, no matter how minor, must be reported to the supervisor and logged

9.3 In Case of Fire

5. Stop work and alert others in the immediate area
6. Activate the building fire alarm if not already sounding
7. Evacuate to the designated muster point — do not use elevators
8. Call emergency services (911 or local equivalent)
9. Do not re-enter the building until cleared by fire department or building management

10. Incident and Near-Miss Reporting

All incidents — injuries, property damage, near misses, and unsafe conditions — must be reported immediately to the site supervisor, regardless of severity.

10.1 Reporting Steps

10. Ensure the area is safe and provide first aid/medical attention as needed
11. Notify the supervisor immediately
12. Preserve the scene where possible until it has been assessed, unless doing so creates further danger
13. Complete an Incident/Near Miss Report (Appendix B) before the end of the shift
14. Supervisor investigates the incident, identifies root causes, and implements corrective action
15. Serious injuries, deaths, or other reportable incidents must be reported to the applicable regulator within the legislated timeframe (e.g. immediately for a WorkSafeBC-reportable incident)

10.2 No Blame, No Reprisal

Reporting is about preventing recurrence, not assigning blame. No worker will face discipline for reporting an incident, near miss, or hazard in good faith.

11. Workplace Violence and Harassment Policy

11.1 Policy Statement

Canada Lockers is committed to providing a workplace, and job sites, free from violence, harassment, bullying, and discrimination. This applies to all employees, subcontractors, and site personnel, and to interactions with clients, building staff, residents, and members of the public encountered in the course of work. This policy applies at the job site, in company vehicles, at company-related events, and in work-related communications (phone, text, email, radio).

11.2 Definitions

Harassment

Any objectionable or unwelcome conduct, comment, gesture, or contact — whether a single serious incident or a pattern of behaviour — that a reasonable person would know is unwelcome, and that demeans, humiliates, or embarrasses another person. This includes harassment related to race, colour, ancestry, place of origin, religion, sex, sexual orientation, gender identity or expression, age, marital or family status, physical or mental disability, or any other ground protected under applicable human rights legislation.

Sexual Harassment

Unwelcome sexual comments, advances, requests for sexual favours, or other verbal, visual, or physical conduct of a sexual nature, including where submission to such conduct is made a condition of employment or advancement.

Bullying

Repeated, unreasonable behaviour directed at a worker that creates a risk to health and safety, including verbal abuse, excluding or isolating a worker, sabotaging someone's work, or spreading malicious rumours. This does not include reasonable management action delivered in a reasonable manner, such as performance feedback, scheduling, or work direction.

Workplace Violence

The attempted or actual exercise of physical force against a worker that causes or could cause injury, or a threat or behaviour that gives a worker reasonable cause to believe they are at risk of injury. This includes threats made in person, by phone, text, or in writing.

11.3 Prohibited Conduct — Examples

The following are examples only and are not exhaustive:

- Offensive jokes, slurs, name-calling, or derogatory comments about a protected characteristic
- Unwelcome physical contact, gestures, or invasion of personal space
- Displaying or sharing offensive images, messages, or materials, including on job sites or in group chats
- Threats, intimidation, or aggressive behaviour toward coworkers, clients, or the public
- Retaliation against a person who reports harassment, violence, or an unsafe condition, or who participates in an investigation

11.4 Reporting Procedure

Anyone who experiences or witnesses harassment or violence — by a coworker, supervisor, client representative, building staff, or a member of the public — should report it as soon as possible using any of the following channels:

- Their direct supervisor or foreman
- Any member of management, if the concern involves the direct supervisor
- Directly to our Operating Partner, Paul Birch 672-533-1122

Reports may be made verbally or in writing using the Harassment/Violence Complaint Form (Appendix C). A worker who does not feel safe reporting through normal channels — for example, if the concern involves a supervisor — may report directly to senior management using the contact above.

If there is an immediate risk of harm, call 911 first, then notify the supervisor and management as soon as it is safe to do so.

11.5 Investigation

- All reports will be taken seriously and investigated promptly, impartially, and as confidentially as possible
- The person who made the report, and the person the report is about, will each have the opportunity to respond
- Information will be shared only with those who need to know in order to investigate and resolve the matter
- Appropriate corrective action will be taken based on the findings, up to and including termination of employment or the business relationship with a subcontractor
- Where the conduct involves a client, building representative, or member of the public, Canada Lockers will take reasonable steps available to it to address the situation, which may include removing workers from the site, raising the matter with the client/general contractor, or involving police

11.6 No Retaliation

Canada Lockers will not tolerate retaliation against anyone who reports harassment or violence in good faith, or who participates in an investigation. Retaliation is itself a violation of this policy and will result in termination.

11.7 False Complaints

This policy is not violated by a complaint made in good faith that is not ultimately substantiated. However, a complaint made maliciously or known to be false may itself result in corrective action.

11.8 Support and Resources

Workers affected by workplace harassment or violence may access support by speaking with Paul Birch (672-533-1122), provincial victim services, or local crisis/support lines. A worker is never required to resolve a harassment or violence concern directly with the other party if they do not feel safe doing so.

12. Training and Orientation Requirements

Training	Required For	Frequency
Site orientation & this manual	All workers before first shift on any site	Once per worker, refreshed if manual changes materially
WHMIS 2015	All workers handling or working near controlled products	On hire, refresher every 3 years or per employer policy
Silica awareness & exposure control plan	All workers performing or working near concrete drilling	Before first exposure, annually thereafter
Respirator fit testing	All workers required to wear a tight-fitting respirator	Annually, and whenever facial characteristics change
First aid	At least one worker per site/shift	Per certification validity period
Fall protection	Workers performing work at height meeting the regulatory trigger	Before assignment, refreshed per regulation
Ladder safety	All workers using ladders/step platforms	On hire / as part of orientation
Powder-actuated tool operation (if used)	Workers operating powder-actuated fastening tools	Manufacturer/regulator-required certification before use

13. Inspections and Program Review

- Site supervisors will conduct a documented site safety inspection at the start of each new project and periodically (at minimum weekly) for multi-day projects
- Tools will be visually inspected before each use and taken out of service if damaged or not functioning
- This manual will be formally reviewed at least annually, after any serious incident, and whenever there is a significant change to the work, equipment, or applicable regulation
- Findings from inspections, incident investigations, and worker feedback will be used to update this manual and site procedures

Appendix A — Field Level Risk Assessment (FLRA)

Field	Details
Project / Site	
Date / Time	
Crew Members	
Task(s) Planned	
Hazards Identified	
Controls Required	
PPE Required	
Permits Required (hot work, confined space, etc.)	
Emergency Contact / Muster Point	
Worker Sign-Off (all crew)	
Supervisor Sign-Off	

Appendix B — Incident / Near Miss Report

Field	Details
Project / Site	
Date / Time of Incident	
Persons Involved	
Description of Incident / Near Miss	
Injury / Damage (if any)	
Immediate Action Taken	
Root Cause(s)	
Corrective Action(s) & Owner	
Reported By / Date	
Reviewed By Supervisor / Date	
Regulator Notified? (Y/N, date)	

Appendix C — Harassment / Violence Complaint Form

Reports may also be made verbally. This form can be completed by the person reporting, or by the person receiving the report.

Field	Details
Name of Person Reporting (optional)	
Date / Time of Report	
Date(s) / Location(s) of Incident(s)	
Person(s) Involved	
Description of Incident(s)	
Witnesses (if any)	
Immediate Safety Concern? (Y/N)	
Report Received By	
Next Steps / Investigation Assigned To	

Appendix D — PPE Quick Reference

Task	Required PPE
General site presence	Hard hat, safety footwear, hi-vis (where vehicle traffic present)
Handling mesh/steel panels	Cut-resistant gloves, safety glasses
Drilling/anchoring into concrete	Safety glasses, hearing protection, fit-tested respirator per ECP, dust extraction in use
Cutting/grinding steel or mesh	Safety glasses/face shield, hearing protection, cut-resistant gloves
Working at height (ladder/podium)	As above, plus fall protection if trigger height/conditions are met

Appendix E — Emergency Contact Sheet (Template)

Contact	Number / Detail
Emergency Services (Fire/Police/Ambulance)	911
Site Supervisor	
Canada Lockers Office	
General Contractor / Building Contact	
Nearest Hospital	
Poison Control	
WorkSafeBC (or applicable regulator) Incident Line	