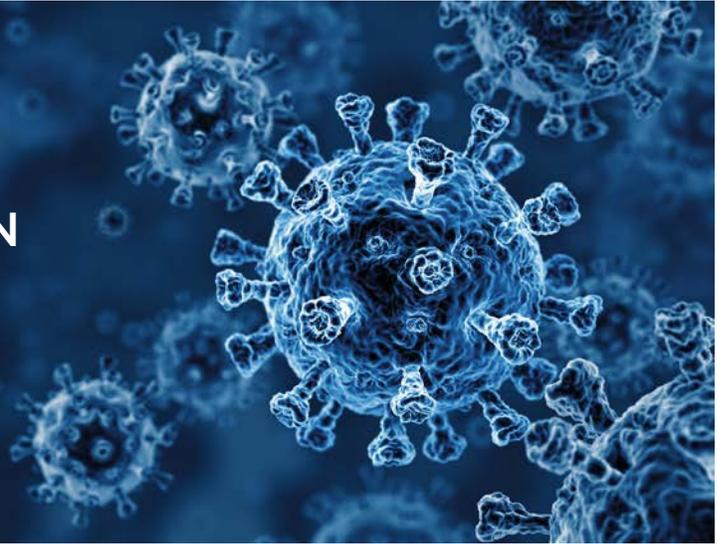




HEALTH AND SAFETY GUIDANCE DURING COVID-19 FOR PHYSICIAN AND PRIMARY CARE PROVIDER EMPLOYERS



OVERVIEW

This is not a legal document and employers are advised to seek legal advice.

Employers have obligations to protect workers from hazards in the workplace as set out in the [Occupational Health and Safety Act \(OHSA\)](#) and its regulations as well as the directives coming from the Chief Medical Officer of Health.

Workers should raise any concerns to their:

- Supervisor
- Joint Health and safety Committee
- Health and Safety Representative

This will help ensure the employer has taken all reasonable precautions.

Ontario is currently in the midst of a [global pandemic](#). While the COVID-19 situation is changing daily, **the legislation and regulations used to govern Ontario's workplaces remain in force.**

Under Ontario law, employers have the duty to take every reasonable precaution to protect workers from hazards in the workplace. Workers have the [right to refuse unsafe work](#). If health and safety concerns are not resolved internally, a worker can seek enforcement by filing a complaint with the Ministry's Health and Safety Contact Centre at 1-877-202-0008. Failure of the employer to comply with the OHSA and its regulations could result in a [stop-work order](#) upon inspection by the Ministry of Labour, Training and Skills Development.



BEST PRACTICES TO KEEP YOUR WORKERS HEALTHY AND SAFE

The health and safety of workers is a top concern amid the global COVID-19 pandemic. During this time, all parties must place an increased focus on health and safety in order to protect the health and safety of workers and to keep physician and primary care provider operations running and safe.

All measures taken to prevent the spread of COVID-19 should be done in compliance with requirements under the OHSA and its regulations and the applicable public health directives issued by the Chief Medical Officer of Health.

In addition, below are a set of resources, tips and best practices to help employers prevent the spread of COVID-19 in workplaces.

PROTECTING YOURSELF AND CO-WORKERS-GENERAL GUIDANCE

The virus typically spreads through coughing and sneezing, personal contact with an infected person, or touching an infected surface and then face – mouth, nose or eyes. Here is some general guidance and [helpful tips](#) to help prevent the spread of germs:

- Maintain physical distancing of at least 2 metres (6 feet) or more between persons, including clients and co-workers. (see Physical Distancing)
- Promote good hygiene such as:
 - Wash your hands often with soap and water when hands are visibly soiled, before and after any breaks, at the beginning and end of their shift, and before preparing food or use alcohol-based hand sanitizer (with 70% alcohol content) if hand washing is not possible.
 - Sneeze and cough into your sleeve.
 - If you use a tissue, discard immediately and wash your hands afterward.
 - Avoid touching your eyes, nose or mouth.
 - Avoid high-touch areas, where possible, or ensure you clean your hands after.
- Implement regular cleaning and disinfection (see Environmental Cleaning and Disinfection)
- Minimize contact with people who are sick and ensure controls are in place for the protection of workers.
- Instruct workers to stay home if they are sick.
- Where possible, wear gloves when interacting with high-touch areas. Do not touch your face with gloved hands. Take care when removing gloves. Ensure you wash your hands after removing them.
- Wash your clothes as soon as you get home.
- Instruct staff who have symptoms or think they were exposed to COVID-19, to notify their supervisor immediately, complete the [self-assessment](#) and follow the instructions provided.

All health care providers, including physicians should monitor for signs of illness. Health system employees should diligently monitor themselves for signs of illness over the course of the pandemic and identify themselves to their manager and/or occupational health and safety departments if they feel



unwell. If a health worker begins to feel unwell while at work, they should immediately don a surgical mask and notify their manager and/or occupational health and safety department.

ESTABLISH AN EFFECTIVE OCCUPATIONAL HEALTH AND SAFETY AND INFECTION PREVENTION AND CONTROL PLAN

Establish an infectious disease preparedness and response plan. The plan should follow recommendations in [guidance notes](#) from the [Ministry of Health](#) and directives from [Public Health Ontario](#). The plan should consider and address levels of risk associated with the workplace and job tasks within physician and primary care provider offices. This includes how the physician and primary care provider offices will operate during and throughout the recovery phase following the pandemic including sanitization of the workplace, equipment and resources, how employees report illness, how to ensure social distancing and how work will be scheduled.

To access the most recent Ministry of Health guidance notes please visit and scroll down to find your relevant sector information:

http://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/2019_guidance.aspx

A list of activities and links to relevant resources to provide support in this area are listed below:

- All primary care providers are encouraged to implement a system for virtual and/or telephone consultations when and where possible. When possible, primary care providers should conduct a consultation over the phone, video or secure messaging to determine if a virtual/telephone consultation will suffice or if an in-person appointment is necessary. The purpose of this is to support physical distancing and minimizing contact of persons who may have COVID-19 with health care settings as much as possible.
- Where in person care is required for essential visits, consider providing some care virtually even if an in-person visit is needed in order to minimize the in-person time required (i.e., an essential prenatal visit could be divided into a virtual discussion of testing/screening options with a brief in person physical assessment).
- Minimize the need for patients to wait in the waiting room (e.g. spreading out appointments, having each patient stay outside the clinic until the examination room is ready for them and then call in, by phone preferably).
- Minimize staff in the office/clinic. Consider what tasks can be done from home or outside of regular hours to minimize staff interactions with each other and patients.
- Physician and primary care provider employers should implement a system of active screening over the phone or video before appointments are scheduled and upon entry to the facility using the latest [case definition](#). Staff conducting active screening in person should ideally be behind a plexiglass barrier. Staff who do not have a barrier or cannot maintain a 2-metre distance should use appropriate PPE e.g. masks, eye protections, gloves and gowns.
- [Primary care providers should post information on their clinic website or send email to all patients advising to call prior to coming to a clinic.](#)



- Anyone who screens positive over the phone should be advised to immediately self-isolate and be offered a same day telephone consultation. If the patient/client fits the case definition, they should be referred to the local assessment centre or testing facilitated by the [local public health unit](#).
- A person who screens positive upon entry to the facility should be separated from others so that they are at least 2 metres apart or in a separate room and given a surgical/procedure. The physician or primary care provider may offer clinical assessment, examination, and possibly testing or make a referral to the local assessment centre. Physicians should ensure patient/client has safe travel arrangements and call ahead to inform the assessment centre of patient's arrival.
- Report probable and confirmed cases to your supervisor or by contacting your local Public Health unit. Communication about who will take responsibility, ensuring proper documentation and implementing any advice given by the Public Health unit is critical for containing the spread of COVID-19.
- Assign staff to dedicated work areas as much as possible. Discourage them from sharing phones, desks, offices and other tools and equipment.
- Limit the exchange of papers (e.g. signing contracts). If documents must be exchanged, leave them on a clean surface while maintaining a two-metre distance. Avoid sharing pens and office equipment. Disinfect after each use.
- Schedule visits to eliminate people gathering in reception areas.
- Use other appropriate controls when treating suspected cases, such as putting a mask on the patient, promoting hand hygiene, placing patients in negative pressure isolation rooms or, if one is not available, in a private room with the door kept closed. Administrative controls include restricting the number of personnel entering the room and having proper training about the appropriate use of personal protective equipment (PPE) (gloves, gown, mask or respirator, eye protection, face shield).
- Proper use of personal protective equipment (PPE) for contact/droplet precautions (gown, gloves, mask/respirator, and eye protection) at a minimum. (N95 respirators are required for Aerosol Generating Medical Procedures)
- Practice at least droplet and contact precautions when physical contact with people who have flu-like symptoms is required
- Place posters or other signage in high traffic areas:
 - Asking clients or customers to stay home if they have symptoms (fever, cough or difficulty breathing) or to wear a non-medical mask if they have symptoms
 - Encouraging good respiratory hygiene, hand hygiene, and other healthy practices at the entrance to the workplace. Consider hand sanitizer stations at these locations where possible. Consider remote work for employees wherever and whenever possible.
- Institute measures to physically separate or impose physical distance of at least 2 metres between persons. This could be done by use of physical partitions, visual cues or signage to limit close contact.
- Provide training to workers on COVID-19, how it spreads, risk of exposure, including those who may be at higher risk (i.e. have underlying health conditions) and procedures to follow including reporting process, proper hand washing practices and other routine infection control precautions.
- Actively encourage sick employees to stay home, ensure that sick leave policies are flexible and consistent with public health guidance. Communicate these policies to employees.



- Based on risk of exposure, consider implementing a process for containing and laundering work clothing. Alternatively, advise workers to practice good laundry hygiene practices with their clothing as it could potentially be a source of contamination.
- Have a system for reporting probable and confirmed cases to the local [Public Health](#) unit. Communication about who will take responsibility, ensuring proper documentation, and implementing any advice given by the Public Health unit is critical for containing the spread of COVID-19.
- Assign staff to dedicated work areas as much as possible. Discourage them from sharing phones, desks, offices and other tools and equipment.
- Limit the exchange of papers (e.g. signing contracts). If documents must be exchanged, leave them on a clean surface while maintaining a two-metre distance. Avoid sharing pens and office equipment. Disinfect after each use.
- Schedule visits to eliminate people gathering in reception areas.

PHYSICAL DISTANCING

As advised by the Chief Medical Officer of Health, [public health officials](#), and outlined throughout government communications, physical distancing is required to control the spread of COVID-19. Physical distancing generally means maintaining a distance of at least 2 metres (6 feet) or more between persons. By maintaining physical distancing, people are less likely to be exposed to a respiratory virus like COVID-19 as the virus can be spread before symptoms appear (pre-symptomatic) and when persons may have contracted the virus but are minimal or no symptoms (asymptomatic).

In order to ensure physical distancing in the workplace, employers should consider:

- Physical distancing may not be possible when providing care, but it can be practiced with colleagues when not providing care.
- Scheduling appointments to limit the number of person in the facility and waiting areas
- Spacing seats in waiting areas at least 2 metres apart from others and removing non-essential items such as books, magazines, remote controls and toys
- If unable to maintain physical distancing workers can use a [non-medical mask](#) to protect those around them
- Limiting the total number of people at the workplace and where they are assigned to work
- Consider implementing a system for virtual and/or telephone consultations when and where possible
- Non-essential face-to-face appointments should be postponed or converted to virtual appointments
- Have staff work from home whenever possible (i.e. administrative staff)
- Staggered start times, breaks and lunches
- Restricting visitors and limiting workplace entry to only essential personnel
- Suspending all group activities and gatherings
- Alter the workplace layout of the floor by moving furniture or using visual cues such as tape on the floor to enhance physical distancing
- Lunchrooms and break rooms must be arranged to follow physical distancing practices. Consider staggered lunch and break times to reduce the number of employees gathering.



ENVIRONMENTAL CLEANING AND DISINFECTION

While employers always have an obligation to [maintain clean workplaces](#), that obligation is under sharper focus during the COVID-19 outbreak.

The COVID-19 virus can survive for several days on different surfaces and objects. Frequent cleaning and disinfection is important to prevent spread of the disease. Many common household and commercial disinfectant products will destroy the COVID-19 virus. Some disinfectants will have an eight-digit Drug Identification Number (DIN). These products are approved for use by Health Canada. Refer to the Public Health Ontario [Fact Sheet for Environmental cleaning](#) for more details.

Employers should focus on:

- Easy access to soap and water (ways to properly clean hands) or alcohol-based hand sanitizer (70% alcohol) if soap and water are not available
- Frequent cleaning and disinfecting of washroom facilities.
- Posting signage on hygiene in English and majority languages in the workplace so everyone can understand how to do their part respecting hygiene practices.
- Sanitizing of commonly touched surfaces or areas (e.g. medical equipment, door handles, light switches, toilet handles, counters, work surfaces, equipment) twice a day and when visibly soiled

REPORTING ILLNESS

The symptoms of COVID-19 are shared with many other illnesses including the cold and flu. At this time, it is recommended that anyone who begins to feel unwell (fever, new cough or difficulty breathing) should return home and [self-isolate](#) immediately. If you are a caregiver, have a household member, or a contact of someone who has COVID-19 you should follow the guidance from public health on [self-isolation](#).

People who are self-isolating should seek clinical assessment over the phone - either by calling their primary care provider's office or Telehealth Ontario 1-866-797-0000. If you need additional assessment, your primary care provider or Telehealth Ontario will direct you to in-person care options.

Anyone who has travelled outside of Canada within the last 14 days should self-isolate upon return from travel and should not go to work.

Workers who have travelled and are part of workplaces that are essential to daily living are able to return to work as long as they do not have symptoms. However, they should self-monitor for a period of 14 days and identify themselves to their employer so that a plan can be put into place to ensure the protection of those workplaces.



MINISTRY OF LABOUR, TRAINING AND SKILLS DEVELOPMENT AND WORKPLACE SAFETY & INSURANCE BOARD REPORTING REQUIREMENTS

The OHSA requires an employer to provide a written notice within four days of being advised that a worker has an occupational illness (including COVID-19) from exposure in the workplace or if a claim has been made to the Workplace Safety and Insurance Board (WSIB) by or on behalf of the worker with respect to an occupational illness, including an occupational infection, to the:

- Ministry of Labour;
- Joint health and safety committee (or health and safety representative); and
- Trade union, if any.

For more information:

- [Occupational Illness: Requirements to Report to the Ministry of Labour](#)

Any instances of occupationally-acquired illnesses shall be reported to [WSIB](#) within 72 hours of receiving notification of said illness.

SHARE INFORMATION

It is important that all parties in a workplace understand their roles and responsibilities. Employers need to ensure health and safety policies are updated and posted for all employees to see. Using industry resources, including this one and those produced by [Public Services Health and Safety Association](#) (PSHSA), the Ministry of Health, and Public Health Ontario will improve workplace understanding.

POST YOUR POLICIES

All employers need to post and communicate COVID-19 policies to employees. These policies should cover how the workplace will operate, including but not limited to:

- The sanitization of workplaces
- How to ensure physical distancing
- How work will be scheduled
- How workers and contractors report illnesses

All businesses should have a workplace illness policy. If a policy does not currently exist or does not align with COVID-19 recommendations, the following should be included: Sick employees must stay home or be sent home from work; For employees housed in workplace accommodations, sick employees must be confined to their rooms until cleared for re-entry into the workforce; Sick employees should use the self-assessment tool for COVID-19 and follow the subsequent directions; When employees go home sick, their work areas must be cleaned and disinfected.



MINISTRY OF LABOUR TRAINING AND SKILLS DEVELOPMENT (MLTSD) REQUIREMENTS

The MLTSD is focused on providing enhanced protections for workers. Effective March 19, 2020, the Employment Standards Act, 2020, was amended to provide [job-protected leaves](#) for employees affected by COVID-19.

TRACK AND MONITOR YOUR WORKFORCE

Due to the latency period of COVID-19, it is important to track where workers have worked, where possible. If a worker tests positive for COVID-19, the local public health unit will ask employers to provide information on where the worker worked as well as the contact information of any other worker who may have been exposed.

All health care providers, including physicians should monitor for signs of illness. Health system employees should diligently monitor themselves for signs of illness over the course of the pandemic and identify themselves to their manager and/or occupational health and safety departments if they feel unwell. If a health worker begins to feel unwell while at work, they should immediately don a surgical mask and notify their manager and/or occupational health and safety department.

EVALUATE

Ask and evaluate:

- Were the proper hygiene facilities (handwashing equipment) available to you?
- Were you able to practice physical distancing?
- Did you have the PPE you required to protect you while you did your job?
- Have you been provided training on the proper use of PPE?
- Do you know what to do if you have symptoms?
- Are you aware of emergency risks in your region and how to prepare for different situations?

COVID-19 RESOURCES OF INTEREST TO EMPLOYERS

COVID-19 GOVERNMENT UPDATES

Stay updated with daily updates:

- <https://www.ontario.ca/page/2019-novel-coronavirus> (Ontario COVID-19 webpage)
- <https://www.canada.ca/en/public-health/services/diseases/coronavirus-disease-covid-19.html> (Canada COVID-19 webpage)
- <https://www.publichealthontario.ca/> (Public Health Ontario)
- http://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/2019_guidance.aspx (Ontario Ministry of Health – COVID-19 sector resources and guidance)



ONTARIO GOVERNMENT

<https://covid-19.ontario.ca/>

This above link provides updates on Ontario's response to COVID-19. This includes:

- status of cases in Ontario;
- current affected areas;
- symptoms and treatments;
- how to protect yourself and self-isolate; and
- updated Ontario news on the virus.

PUBLIC HEALTH ONTARIO

<https://www.publichealthontario.ca/en/diseases-and-conditions/infectious-diseases/respiratory-diseases/novel-coronavirus>

Public Health Ontario is providing up-to-date resources on COVID-19, including:

- links to evolving public health guidelines, position statements, and situational updates;
- a synopsis of key articles updating on the latest findings related to the virus;
- recommendations for use of personal protective equipment;
- testing information; and,
- other public resources.

OTHER COVID-19 RESOURCES

PUBLIC HEALTH AGENCY OF CANADA

<https://www.canada.ca/en/public-health/services/diseases/coronavirus-disease-covid-19.html>

This link outlines the actions being taken by the Government of Canada to limit spread of COVID-19, as well as what is happening in provinces and communities across the country. It also maintains a live update of the number of cases by province.

WORLD HEALTH ORGANIZATION (WHO)

<https://www.canada.ca/en/public-health/services/diseases/coronavirus-disease-covid-19.html>

WHO provides the latest guidance and information related to the global outbreak and spread beyond Canadian borders. It also provides the most up-to-date information on:

- current research and development around the virus
- a COVID-19 situation "dashboard"
- emergency preparedness measures; and,
- live media updates on the spread of the virus.



OTHER RESOURCES

There are a host of additional resources available to help address the ongoing COVID-19 outbreak that are aimed at the Social and Community Services workplaces. Resources include:

- Public Health Unit websites:
<http://www.health.gov.on.ca/en/common/system/services/phu/locations.aspx>
- Government of Canada, COVID-19 Taking Care of Your Mental Health:
<https://www.canada.ca/en/public-health/services/publications/diseases-conditions/taking-care-mental-health.html>
Disability Considerations During the COVID-19 Outbreak: <https://www.who.int/who-documents-detail/disability-considerations-during-the-covid-19-outbreak>

PUBLIC SERVICES HEALTH AND SAFETY ASSOCIATION RESOURCES

- Occupational Illness: Infectious Disease Reporting Form:
<https://www.pshsa.ca/resources/occupational-illness-infectious-disease-reporting-form>
- COVID-19 Resources: <https://www.pshsa.ca/covid-19>
- Physician's Occupational Health & Safety Roles and Responsibilities Fast Fact:
<https://www.pshsa.ca/resources/physicians-occupational-health-safety-roles-and-responsibilities>
- Small Business Manual: <https://www.pshsa.ca/resources/small-business-resource-manual>