



Ontario Police Health and Safety Committee

Guidance Note #18

The Role of the Safety Officer in the Incident Management System

The purpose of this guidance note is to reinforce the important role of a Safety Officer, as a part of an Incident Management System (IMS), in protecting the health and safety of police service workers who are responding to an emergency.

Introduction

Emergency incidents are increasing in complexity and frequency, as such, emergency preparedness and the protection of police service workers is an increasing priority for police services.

A police service might be the sole emergency response provider, or it might be part of a coordinated response for a large scale or complex emergency. An emergency within a municipality could involve both public and private emergency response service providers (e.g. police, firefighters, Emergency Medical Services, utilities, construction, transportation, etc.) as well as other jurisdictions (e.g. other municipalities, provincial ministries and federal ministries).

The Province of Ontario Incident Management System (IMS) doctrine was produced as part of Ontario's ever-improving emergency management program. IMS is a broad term which is intended to bring an orderly, consistent and flexible chain of command and control within an emergency response. The IMS doctrine promotes a standardized approach in structuring a response to all kinds of incidents (small, large and/or complex). It addresses the coordination of personnel, facilities, equipment, procedures and communications to maximize efficiency, effectiveness, timeliness and safe functional interoperability at all levels of emergency management.

The Ontario Police Health and Safety (S.21) Committee supports the Incident Management System for Ontario (IMS doctrine).

Emergency Management and Civil Protection Act

The *Emergency Management and Civil Protection Act* (EMCPA) sets out requirements for provincial ministries and municipalities to develop emergency management programs for public safety.

The EMCPA specifically sets out that:

“...in the event of a conflict between this Act or an order made under subsection 7.0.2(4) and the *Occupational Health and Safety Act* (OHSA) or a regulation made under it, the OHSA or the regulation made under it prevails.”

In the event of a conflict between the EMCPA or an emergency order made under subsection 7.0.2(4) of the EMCPA and the OHSA (or a regulation made under the OHSA), the obligations and requirements under the OHSA or the regulations must be complied with.

Occupational Health and Safety Act (OHSA)

At all times, a police service employer and a supervisor (as defined under the OHSA) must take every precaution reasonable in the circumstances for the protection of a worker (OHSA subclauses 25(2)(h)) and 27(2)(c) respectively).

Employers are also required to provide information, instruction and supervision to a worker to protect the health and safety of the worker (OHSA clause 25(2)(a)).

The health and safety of workers must be protected including during an “emergency”, regardless of whether the incident is managed locally, within a single jurisdiction or is more complex requiring a multi-disciplinary, multi-jurisdictional response.

Role of the Safety Officer

The IMS doctrine describes the role of a Safety Officer assigned by the Incident Command as an individual who “monitors safety conditions and develops safety measures.” It recognizes that “while each person who is assigned a leadership role is responsible for the safety of personnel working under their leadership, the Safety Officer is tasked with creating systems and procedures related to the overall health and safety of all incident responders.”

The IMS doctrine specifically states that “the Safety Officer must have knowledge and professional experience to be able to control or reduce occupational hazards and exposures.” It also states that “during a complex incident, assistants to the Safety Officer may be assigned from a variety of organizations and levels of government.” This is particularly important when multiple emergency response services are responding to the same incident and as the conditions change during an emergency.

The IMS doctrine lists the following as some of the responsibilities for the Safety Officer:

- works closely with Operations to ensure that responders are as safe as possible under the circumstances, including wearing appropriate protective equipment and implementing the safest operational options
- advises command on issues regarding incident safety
- minimizes employee risk by promoting safety procedures (e.g. ensure an adequate personnel accountability system is in place to track the status/movement of all personnel)
- conducts risk analyses based on information from responders' social support

- centres and implementing safety measures, normally through the planning process
- alters, suspends or terminates any or all activities that are deemed hazardous regardless of jurisdiction
- assists in the review of the Incident Action Plan to identify safety concerns and issues
- assists with writing the Incident Medical Plan

The Safety Officer needs to be informed about emerging occupational health and safety hazards affecting all responders including police service workers engaged in activities at the incident. The police service employer and supervisor should obtain current information from the Safety Officer for the incident so that health and safety measures and procedures to protect the health and safety of police personnel.

It is up to each police service to establish how they will structure their internal incident command system and coordinate with other emergency response service providers depending on the nature and complexity of an emergency. In all cases, the police service is required to comply with the OHSA and should adhere to the IMS protocols at the same time.

In the event of a police-only response, the on-scene police service supervisor may be the person with the appropriate level of knowledge and experience to act as the Safety Officer for the incident. Alternatively, it could be another police representative, with the appropriate level of knowledge and experience, who acts as the Safety Officer and who communicates worker health and safety information to and from the police service employer and supervisor.

In an incident involving multiple emergency response service providers, and dependent on the nature of the incident, a police service may not be the agency to assume the role of Incident Command and the on-scene Safety Officer may not be a member of the police service. The responsibility for Incident Command may fall to another agency, such as fire service. The police service should ensure that there is ongoing communication between their Officer in Charge or designate and the on-scene Safety Officer. Continuous communication with the on-scene Safety Officer is necessary to ensure that police service members are knowledgeable about health and safety hazards and the measures and procedures to follow to protect themselves, including wearing appropriate personal protective equipment (PPE) when it is needed.

In incidents which are large-scale, complex, and/or multi-jurisdictional, or in which there are multiple incident sites, a Unified Command model may be necessary. In this case, agencies “work together through their designated members of the Unified Command, to establish a common set of objectives and strategies and a single Incident Action Plan”. The scale of an emergency may also require the establishment of multiple Incident Commands, coordinated through a central Emergency Operations Centre (EOC). The Safety Officer for a police service may therefore be situated at a command center and may be required to obtain briefings from the on-scene Safety Officer. The IMS doctrine notes that it may become necessary to designate Assistant Safety Officers for multi-discipline incidents or for multiple high-risk operations. The Safety Officer would then be responsible for communicating with and obtaining briefings from the Assistant Safety Officers.

When multiple emergency response service providers respond to an incident, some key responsibilities of a police service Safety Officer may include, but not be limited to:

- liaising with the on-scene Safety Officer and other emergency response services engaged in the incident response to assess the health and safety risks and appropriate measures and procedures to protect workers
- identifying health and safety hazards using situational risk assessments and reporting them to the police employer, supervisor and to the on-scene Safety Officer
- liaising with the police service employer and supervisor in a timely manner, to implement health and safety measures and procedures, including the use of personal protective equipment (PPE)
- checking that workers have been provided with current information, instruction and supervision regarding the employer emergency management policy and program, including specific health and safety measures and procedures
- following the communication system protocols to ensure effective communication of current and emerging health and safety information
- remaining available, as appropriate, to respond to questions and/or receive recommendations regarding health and safety matters affecting police service workers who are at the incident site
- documenting any unplanned worker exposures involving police service workers
- reporting all near misses and incidents where police service workers are injured to the police service's supervisor and employer and the incident Safety Officer
- reviewing previous incidents and making recommendations to the police service employer and joint health and safety committee/health and safety representative to improve emergency measures and procedures for worker protection as part of a comprehensive workplace health and safety policy and program

Advancing a culture of health and safety together

Through the adoption of the IMS doctrine and recognition of the important role of the Safety Officer in emergency management we can all work together to protect workers from health and safety hazards and advance a culture of health and safety.

Acknowledgements

The Ontario Police Health and Safety Committee is made up of professionals in police services from across the province with representatives from the Police Association of Ontario, Ontario Provincial Police, Ontario Provincial Police Association, Toronto Police Service, Toronto Police Association, Ontario Association of Chiefs of Police, Ministry of the Solicitor General, Ministry of Labour, Training and Skills Development, Ontario Police College, Ontario Police Health and Safety Association, Ontario Senior Officers' Police Association and Public Services Health and Safety Association. The committee also receives input from experts in the police sector. The Ministry would like to thank the committee for their help in making this guidance note possible.

Additional Information

OPHSC Guidance Note #4: Worker Information, Instruction and Training
OPHSC Guidance Note #12: Competent Supervision- Knowledge, Training and Experience

Resources

Occupational Health and Safety Act

<https://www.ontario.ca/laws/statute/90o01?search=occupational+health+and>

Emergency Management and Civil Protection Act

<https://www.ontario.ca/laws/statute/90e09>

Office of the Fire Marshall and Emergency Management Ontario (OFMEM)

[OFMEM IMS Doctrine](#)

SOLGEN OFMEM Training Portal

https://training.emergencymanagementontario.ca/TPOnline/TPOnline.dll/EMO_Home

SOLGEN OFMEM Hazard Identification & Risk Assessment Information (HIRA)

<https://www.emergencymanagementontario.ca/english/emcommunity/ProvincialPrograms/hira/hira.html>

INCIDENT SAFETY OFFICER NFPA 1521, Chapter 5, 2015

<https://www.oafc.on.ca/sites/default/files/uploads/Training/OFMEM-Train-Res/Sign-Offs/Incident%20Safety%20Officer%20%28NFPA%201521-2015%29%20-%20OFMEM%20Skill%20Sheets%20Booklet%20%28December%208%2C%202017%29.pdf>

Incident Command System Canada

<http://www.icscanada.ca/>

ER-004 Major Incident Command – Policing Standards Manual

Health and Safety System Partners

<http://www.labour.gov.on.ca/english/hs/websites.php>

This document should be shared with the workplace Joint Health and Safety Committee or Health and Safety Representative, incorporated into the workplace occupational health and safety policy and program and posted on the police service's intranet.

The Public Services Health and Safety Association may be contacted for assistance in the development and implementation of an occupational health and safety program, training and specialized services: <http://www.pshsa.ca/>

For more information, contact the Ministry of Labour, Training and Skills Development (MLTSD) Health & Safety Contact Centre toll free at 1-877-202-0008.

For additional information on the requirements under the *Occupational Health and Safety Act* (OHSA), refer to http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90o01_e.htm

This guidance note has been prepared to assist the workplace parties in understanding some of their obligations under the OHSA and the regulations. It is not intended to replace the OHSA or the regulations and reference should always be made to the official version of the legislation.

It is the responsibility of the workplace parties to ensure compliance with the legislation. This guidance note does not constitute legal advice. If you require assistance with respect to the interpretation of the legislation and its potential application in specific circumstances, please contact your legal counsel.

While this guidance note will also be available to MLTSD inspectors, they will apply and enforce the OHSA and its regulations based on the facts as they may find them in the workplace. This guidance note does not affect their enforcement discretion in any way.