

Life Saving Rules FAQs for Contractors

The Safety Taskforce decided that developing the Life Saving Rules was to be one of the first recommendations to be implemented. It is essential that the Rules are followed and people are protected. We are determined to save lives. The Life Saving Rules apply to BC Hydro employees and contractors.

1) What are the Life Saving Rules?

The nine Life Saving Rules are:

1. Maintain your Limits of Approach;
2. Ensure there is a Safety Protection Guarantee or Lock out in place and check that it is appropriate for your work;
3. Test for hazardous energy;
4. Ensure that Worker Protection Grounding/Bonding is applied;
5. Protect yourself from falling when working at height;
6. Maintain a safe atmosphere in a confined space and ensure you can be rescued;
7. Prevent harmful exposure to known carcinogens, toxins and bio-hazards;
8. Don't work while under the influence of alcohol or drugs; and,
9. Adjust your driving to the weather and road conditions.

The Life Saving Rules have replaced the Cardinal Safety Rules.

2) Why are Life Saving Rules necessary?

The August 16, 2010 accident at the Cranbrook Substation that resulted in the tragic loss of a life reinforced the statistics showing that BC Hydro experiences a serious safety incident on average every six months. Since 1971, BC Hydro has experienced 29 fatalities. In many cases, not following a safety rule was a significant factor. The Life Saving Rules focus on the high risk activities with the greatest threat of serious injury or death for employees and contractors. The Life Saving Rules and their reference documentation describes what the Rules are, their intent, scope, special conditions and important considerations.

3) Where did these Rules come from and why have they been selected?

The Rules are not new. They put the spotlight on the activities that carry the greatest potential threat of serious injury or death to our people when safety rules are not observed.

A cross –functional team (five IBEW, three COPE and two Managers) developed the Rules based on input from over 400 employees and subject matter experts, and data from the Level 1 incidents and near misses over the past few years.

4) Does this mean other safety rules are not as important or do not apply?

All our safety rules are important in ensuring employees and contractors go home safe each day. For example, the Safety Practice Regulations (SPRs) are considered the primary reference and have to be followed. In fact, a number of the Life Saving Rules are based on rules in the SPRs. Others are

based in OSH standards and specific safety policy, and are grounded in WorkSafe BC or other regulations. The Life Saving Rules simply draw attention to activities that carry the greatest potential threat of serious injury or death when safety rules are not followed.

5) Were the unions involved in the creation of the Rules?

Yes, there were five members from the IBEW (a Mechanic, a Stations Electrician, a Generation Electrician, a PLT, and a Carpenter), and there were three members from COPE (an OSH specialist, a Construction Officer and a Designer). Also, the unions have signed off on the Rules demonstrating their support.

Both Gwenne Farrell, Vice President from COPE and Doug McKay, Business Manager from the IBEW were executive sponsors of the team, together with Debbie Nagle, Senior Vice-President, HR and Chief HR Officer, Greg Reimer, Executive Vice-President, Transmission and Distribution, and Chris O'Riley, Executive Vice-President of Generation.

6) Am I expected to report when I see an unsafe working condition or someone is breaking a rule?

Always intervene where there is unsafe work being done. We want a safe working environment for everyone. If you observe someone breaking a Life Saving or other rule, or continuing work in unsafe conditions you should always intervene if it is safe for you to do so. Yours may be the last opportunity to stop an injury or fatality.

If the unsafe act or condition persists, escalate immediately to the person in charge of the work activity or your direct supervisor. We expect and encourage people to report incidents so that we can improve safety and learn from our experiences.

The overarching value of the BC Hydro Life Saving Rules is "Have the courage to intervene if you see an unsafe act or condition or you observe someone unfit for work." It is equally important that we all accept intervention.

We want to foster an environment where all employees and contractors feel comfortable reporting incidents and unsafe acts or conditions, so that we will have as much information as possible to improve the system and worker safety.

7) How will the Life Saving Rules be enforced?

The rules are largely already in effect as SPRs and OSH standards, and as such are part of the contract you work under. They are also grounded in WorkSafe BC regulations and other legislation that all employers must comply with. For more detailed information, refer to the "Life Saving Rules Reference Pages" that are part of the contractor information package.

8) What happens if there is an incident?

BC Hydro expects its contractors to report incidents and near misses to the BC Hydro Representative without delay (as per Incident Reporting clause in BC Hydro's standard contract). Contractors must do an investigation and submit the investigation report to their BC Hydro Rep, who will in turn assess the Corrective Actions and accept or reject the report. Applicable reports are also submitted to WorkSafeBC. (See Workers Compensation Act, Sections 172-177)

9) Who pays for the investigation?

The contractor is responsible for the investigation and report. This is a cost of doing business.

10) What if there is disagreement over a report's findings?

The main purpose of a report is to share learning to avoid any such incidents or near misses in the future. As such, disagreements are best handled in an open discussion between the contractor representative and the BC Hydro representative.

All contract documents specify conflict resolution and escalation processes beyond that.

11) Are these rules applicable for all contractors?

Yes. We are rolling the Life Saving Rules out first to contractors that do high hazard work for us.

12) What if I have a different safety program?

Each company by law must have a safety program, tailored to their specific business. The Life Saving Rules do not replace the requirement for a safety program; they only put the spotlight on those hazards and activities that carry the greatest potential threat of serious injury or death when safety rules are not followed. They are not new rules and are grounded in existing acts and regulations that each employer must follow already.

14) Who else has Life Saving Rules? Is this a BC Hydro idea?

Life Saving Rules are not a new concept. There are a number of companies that have Life Saving Rules, such as Shell, Dominion Power in Virginia, and Southern California Edison. WorkSafe BC has a list of 11 deadly sins.

15) We have heard that BC Hydro uses "Just Culture" when someone violates a Life Saving Rules – does this apply to contractors as well?

What is Just Culture: The Safety Taskforce recommended that BC Hydro adopt a set of Just Culture Principles which can be applied to our approach in managing safety. A Just Culture approach has been demonstrated to improve safety performance in other organizations. Just Culture emphasizes learning rather than blame and seeks to improve the system. It balances organizational and personal accountability.

In a Just Culture, safety incidents and rule-breaking are viewed as opportunities to learn how safety can be improved. People involved in safety incidents are encouraged to report the incident. Safety incidents are investigated thoroughly to determine whether the root cause is a system failure or human behaviour (or a combination of the two). The investigation determines the type of behaviour involved, such as an honest mistake, at-risk behaviour or reckless behaviour. Having a deeper understanding of the system and behavioural aspects of safety incidents allows for better corrective actions to ensure a similar incident doesn't occur in the future.

How does Just Culture apply to contractors? BC Hydro cannot interfere with how contractors deal with their employees. We will be happy to provide any contractors with information on how we are applying just culture with our own employees.

16) Who provides the training for contractors employees?

Contractors are expected to provide the training to their employees and to maintain records of employees who have received Life Saving Rules orientation. Contractors will be provided with a training package for Life Saving Rules that includes video, animation, PowerPoint presentation and additional reference material.

17) Am I required to document the training?

It is recommended that you maintain records of your employees and subcontractors who have received the Life Saving Rules orientation. This information may need to be submitted to your BC Hydro Representative upon request or as per established local practices.

18) How do I get more information?

You can contact your BC Hydro Contracts Representative for more information.