

SCENT SAFETY	Human Resources
	HR-OH(o) – 270
Issuing Authority (sign & date)	Debbie Molloy, VP Signed by Debbie Molloy Dated October 22, 2015
Office of Administrative Responsibility	Occupational Health Safety & Rehabilitation
Author	Tami MacDonald, HR Strategist Human Resources Employee and Labour Relations Tom Godden, Manager of Occupational Health & Safety
Level	One (I)
Original Approval Date	October 22, 2015
Effective Date	Upon signature
Scheduled Review Date	October 2018
Actual Review Date	
Revised Date(s)	

Overview

Eastern Health’s vision is *“Healthy People, Healthy Communities”*. Eastern Health is committed to building a healthy workplace and promoting and supporting health among the people and communities of the eastern region. This policy supports this commitment and in response to rising health concerns from exposure to scented and fragranced products and other forms of scents.

This policy covers: scent reduction practices and operational expectations. The procedure section lays out Eastern Health’s commitments to health, safety, and rehabilitation actions, and accommodations for scent related sensitivities.

Scent Safety Awareness

The term “scents” means fragrances or aromas – anything that adds a smell to something else. Scents are usually made from a mixture of natural (organic) and man-made chemicals (inorganic) - volatile compounds (VCs). VCs are a variety of natural and synthetic compounds that are breathed into the lungs or/and penetrate through the skin. VC may cause health problems for some people. In particular, people with environmental allergies, chemical sensitivities, chronic obstructive pulmonary disease (COPD) or other lung diseases can have a range of responses to these compounds; as such, the problem with scented products is not the smell itself but the VCs that produce the smell. Symptoms are a

response to the VCs in the product not the smell.

These responses can be both physical and neurological, examples include: headaches, nausea, disorientation, dizziness, migraines, fatigue, and asthmatic reactions (i.e. shortness of breath), throat closures, and anaphylaxis (includes life threatening responses). Impact can be described as:

- a nuisance, which is an unpleasant smell but causes no adverse health affect;
- a trigger, which can trigger an existing response;
- a sensitivity, which is a mild response leading to an adverse health affect; and
- an allergy or immune response which is a moderate to severe response leading to an adverse health affect.

Scents can usually be found in:

- (1) Personal products: perfumes, aftershaves, colognes, hair spray, shampoos, conditioners, soaps, body lotions, deodorants, tobacco smoke (which contains many toxins in addition to VCs), food, and flowers.
- (2) Household items: air fresheners, deodorizers, candles, some laundry detergents, fabric softeners and cleaning products that you can bring into the workplace on your clothing and hair.
- (3) Workplace and environmental items: cleaning products, adhesives, industrial chemicals, emissions, food additives, machinery, caulking, furniture, building materials, dust, mold, and pollen.

Scents emit naturally or when agitated (i.e. heated).

Even products labeled "unscented" may actually contain chemicals used to mask the smell of certain ingredients. Health Canada has specific rules about how companies can use these words on their labels. Therefore, a product that is labeled "unscented" may be totally odorless yet it may still contain chemical based fragrances. A safer less toxic option would include "fragrance free" products.

POLICY

Eastern Health will take all reasonable steps to create and maintain an environment where the presence of scents/fragrances is reduced and controlled to the extent practicable while serving the general public.

Scent Reduction

Scented products are to be avoided in Eastern Health workplaces. Individuals

are asked to take reasonable precautions to minimize the impact of scented products in the workplace. This includes not wearing or bringing scented products into the workplace, and refraining from activities and/or situations that emit or agitate scents (i.e.; adding heat). Wherever reasonably achievable, it also includes notifying patients, clients, residents, and visitors and agents such as contractors of this policy before they enter the premises

Individuals share in the responsibility of supporting, complying with, and enforcing this policy to bring about change in personal behavior that will reduce scent induced responses.

Wherever possible, Eastern Health will use environmentally friendly and fragrance-free products.

Wherever possible, Eastern Health will schedule major cleaning, renovation and construction jobs for when the least number of individuals are present or after accommodations can be made and in conjunction with the infection prevention and control procedures during maintenance of the health care facilities.

Community based clients and others in their home may be asked to refrain from wearing or using scented products for a 24 hour period prior to home visits with the exception noted below.

Departments will take appropriate action, including information on intake letters, case management letters, and signage, to inform clients and visitors of this policy and to ensure that the conditions of this Policy are implemented and enforced.

Operational Exceptions

Where possible, Environmental Services will use cleaning and industrial products which are environmentally friendly, low emission, and low scented. Exceptions can be made for work sites that require the use of specialized industrial or clinical products and equipment.

Community Services often conduct spontaneous, unscheduled, and emergency visits to client's homes. In these cases, 24 hours' notice is not practical and employees in these situations need to manage the risks they may encounter to ensure they are safe and any scent related symptoms are prevented by using applicable personal protective equipment and ensuring compliance to the Working Alone or in Isolation policy.

Therapeutic Recreation activities like Cooking/Baking and Aroma Therapy are proven to help certain clients, residents, and patients and will be allowed within the parameters of their risk assessment.

Requests for individual exceptions to this policy may be approved in extenuating circumstances, subject to the review and approval of Occupational Health, Safety, and Rehabilitation.

Scope

This policy applies to all Eastern Health employees, physicians, volunteers, students, agents, herein referred to as representatives.

It also applies to outside contractors, service providers, patients, clients, residents, and the general public as enforced by the representatives.

Purpose

The purpose of this policy is to:

- Communicate Eastern Health's Scent Safety policy to all individuals
- Minimize physically unsafe and/or unhealthy exposure to scents to the best of our abilities while serving the general public;
- Communicate the procedure for dealing with scent sensitivity and the physical and neurological health responses; and
- Document the process for reporting and managing scent sensitivities and their physical and neurological health responses in a respectful, healthy, and safe manner.

Procedure

If negatively impacted by a scents in the workplace:

(1) Seek Medical Attention

Visit your health care provider so that he/she can assess your situation and offer suggestions on how to manage it.

(2) Report the Incident

Eastern Health individuals who have a response to scents as described in the Scent Awareness section within the Overview are advised to report their situation to their manager and follow the Employee Incident and Accident Reporting Policy.

- If a patient, resident, client, or visitor has a reaction to a scent it should be captured in Clinical Safety Reporting System (CSRS) as described in Occurrence Reporting and Management policy.

(3) Investigate the Incident

Management will conduct investigations in accordance with the Incident and Accident Investigation Policy, Clinical Safety Reporting System, and Incident and Accident Reporting process.

(4) Possible Health, Safety, and Rehabilitation Actions and Accommodations

Depending upon the findings and the level of the adverse health effects generated by the response to scents, actions and accommodations would be managed in conjunction with Eastern Health's Hierarchy of Controls including:

1. Awareness
2. Elimination / Removal of Scent
3. Engineering controls
4. Avoidance

Individuals who suffer from medically diagnosed sensitivities to scented products as defined in the Scent Awareness section within the Overview above may seek accommodation by completing an Occupational Health and Rehabilitation Referral Form (CH-1050), attaching medical documentation and submitting it as instructed. Accommodation might include but may not be limited to: the posting of signs to improve scent safety awareness in the immediate work area of the affected Individuals; training; removal of the scents where possible; subject to the duty to accommodate to the point of undue hardship, transfer the individual to another location/area, or in terminate the individual's employment.

Roles and Responsibilities

1. Executive Team

- Promote and maintain a healthy work environment.
- Support and comply with this policy.

2. All Representatives

- Support and comply with this policy;
- Refrain from wearing or bringing scented products in any of Eastern Health's facilities;
- Work together in the spirit of cooperation and understanding to find a mutual solution to responsive situations of self, colleagues, and/or patients, clients, residents, or visitors;
- Report sensitivities to Occupational Health, Safety, and Rehabilitation in conjunction with the Incident Reporting section above;
- Ensure information posters are visible in all facilities and sites;
- Orientate/inform individuals about the policy;
- Enforce this policy to bring about change in personal behavior that will reduce scent induced responses;
- Ensure written materials (i.e. admission letter, visitor pamphlet, handout) provided to patients, clients, resident, visitors and/or family designates prior to admission contain approved messaging as posted in the Guidelines section of this policy;
- Advise all external individuals including visitors, contractors, patients, clients and/or family designates of the policy and their obligations under it.

3. Occupational Health Safety and Rehabilitation

- Support and comply with this policy;
- Develop, monitor, maintain, communicate, implement, and evaluate this Policy to provide a healthy and safe environment for its individuals;
- Stay current in the topic of Scents;
- Monitor compliance with the Occupational Health and Safety Act and Regulations and reporting on same;
- Function in an internal consulting capacity to offer advice, and guidance on preventing and managing scent responses including the review, justification and approval of operational exceptions;
- Collaborate with:
 - Communications to develop and deliver messaging for distribution and posting;
 - Clinical Chiefs, and Departmental and Program Management conducting hazardous recognition, evaluations, or controls, policy enforcement, and/or mitigating actions;
 - Infrastructure Support and Materials Management in the acquisition of least toxic product options as determined by the user and OHS&R;
 - Occupational Health and Safety Committees & Representatives on the policy's implementation and management; and
 - Materials Management to ensure that the specifications for all new product and service purchases comply with this policy by ordering accordingly and informing vendors tenders, requests for proposals, and other requests for products or services to inform vendors that Eastern Health will use environmentally friendly and fragrance-free products; and
 - Support incident(s) reporting, investigations, findings, actions and accommodations as applicable.

4. Clinical Chiefs, and Departmental and Program Management

- Support and comply with this policy;
- Communicate this policy and the individual obligations under it with employees, students, volunteers, agents and contractors, within their areas of responsibility and span of control;
- Ensure policy compliance and take appropriate corrective action in circumstances involving violations and scent responses
- Notify OHS&R and Consulting Services of any operational undue hardship;
- Oversee, manage and support employees enforcing the policy with patients, clients, residents, visitors, the general public and other Individuals; and
- Listen and treat incident reporting with respect and in good faith, and discuss how a resolution can be reached.

5. Employee/Labour Relations

- Support and comply with this policy;
- Communicate policy to union groups and collaborate to ensure

compliance;

- Subject to the duty to accommodate to the point of undue hardship, seek to facilitate accommodations where possible, in consultation with the employee, the applicable Union and OHS&R..
- Support managers in implementing the policy and taking action in cases of continued violation of the policy. This may include:
 - Advice and guidance to the manager and employees;
 - Support incident reporting processes;
 - Issuing letters related to the accommodation decisions and any follow-up activities that may arise thereafter;
 - Support Workplace Health Safety and Compensation Commission processes; and
 - Support return to work processes, where such processes do not constitute undue hardship.

6. Employees sensitive to scents

- Support and comply with this policy;
- Take appropriate precautions to protect yourself from exposure to scented products;
- Report incidents as per the Employee Incident and Accident Reporting Policy;
- Cooperate and fully participate when required throughout the accommodation process including, without limitation, as it relates to building awareness; providing relevant information when required during the assessment, planning and implementation processes associated with the specific accommodations being reviewed;
- Attain an individual treatment and management plan from a medical practitioner as applicable;
- Work with your manager to seek to identify scent hazards and assuming such identification is possible, subject to the Employer's operational requirements, seek to have such scent hazards controlled to the degree practicable;
- Work with and provide Occupational Health and Rehabilitation with appropriate medical documentation, if required;
- Work with the manager to determine accommodation options; and
- Accept accommodation options, if required.

7. Environmental Services

- Support and comply with this policy;
- Work with Materials to ensure cleaning products used are environmentally friendly and low scent;
- Schedule cleaning in major areas during low traffic times to decrease exposure; and
- Where low scented products are either not available or not effective, ensure notice is provided to staff before undertaking cleaning activities in the area.

8. Infrastructure Support

- Support and comply with this policy;
- Procure, install and maintain approved signage in support of policy;
- Before major construction, renovations or maintenance work is carried out that may involve the use of strong odor/chemical releasing products, consult and work with the manager to determine strategies to limit exposure to staff, patients, clients and residents in conjunction with the infection prevention and control procedures during maintenance of the health care facilities. These strategies may include, but are not limited to, moving clients, moving services, staff notification, adjustments, timing of jobs, and expediency in carrying out the job;
- Assess all products (adhesives, caulking, carpets, etc.) and choose least toxic products options based on the product information available that meet other requirements;
- Ensure all leasing arrangements that include provision for cleaning services:
 - Are established as appropriate in support of this policy;
 - Include provisions requiring that any and all changes to cleaning procedures, products used, etc. must be reviewed and approved by Eastern Health to ensure they are appropriate for Eastern Health's operations at the site/location when possible; and
 - Include provisions for Eastern Health to negotiate changes in requirements for cleaning as required based on changes in Eastern Health operations at the site/location over the course of the contract; and
 - Include the Scent Safety policy in all contractor orientations.

9. Materials Management and Departments tendering products or services directly (i.e.; Central Laundry)

- Support and comply with this policy;
- Assess all products in relation to the toxins (i.e. furniture etc.) emitted and choose least toxic options as listed in the product information that meet other requirements;
- Ensure all cleaning contracts and leasing arrangement that include provision for cleaning services:
 - Are established as appropriate in support of this policy;
 - Include provisions requiring that any and all changes to cleaning procedures, products used, etc. must be reviewed and approved by
 - Eastern Health, OHS&R to ensure they are appropriate for Eastern Health's operations at the site/location when possible; and include provisions for Eastern Health to negotiate changes in requirements for cleaning as required based on changes in Eastern Health operations at the site/location over the course of the contract.
- Include a clause in tenders, requests for proposals, and other requests for products or services to inform vendors that Eastern Health will use environmentally friendly and fragrance-free products.

10. Communications

- Support and comply with this policy;
- In consultation with Occupational Health Safety and Rehabilitation, develop communication messaging with respect to this policy;
- Develop appropriate communication tools to communicate this policy to internal and external stakeholders.

Non-compliances

- Where patients and/or clients requiring ambulatory services are able and who are wearing or bringing in scented products should be asked to: remove the scent, wash off the scent, change into a hospital gown, or make another appointment. If they do not comply, employees should speak to their manager. Managers/security will evaluate the situation and select the best possible solution based on the situation including the health and safety of all involved.
- Where patients and/or clients requiring ambulatory services are unable and who are wearing or bringing in scented products should be serviced by employees without scent sensitivities, or moved to an area unaffected by scents.
- Individuals admitted as inpatients or residents within Eastern Health hospitals or long term care facilities wearing or bringing in scented products may be asked to wash the scented product off and/or make arrangements to have it removed from the facility. If they do not comply, employees should speak to their manager. Managers/security will evaluate the situation and select the best possible solution based on the situation including the health and safety of all involved.
- Friends or family members accompanying patients, clients or visiting inpatients or residents who are wearing or bringing in scented products may be asked to leave or wait outside the facility if they are wearing scented products. If they do not comply, employees should speak to their manager or security. Managers/security will evaluate the situation and select the best possible solution based on the situation including the health and safety of all involved.
- Representatives of Eastern Health who are wearing or bringing in scented products can be asked to wash the scented product off and/or make arrangements to have it removed from the facility. In reoccurring cases, disciplinary action may be issued.

Supporting Documents *(References, Industry Best Practice, Legislation, etc.)*

- Scented Products Education and Information Association of Canada
<http://cctfa.ca/scented>
- International Fragrance Research Association <http://www.ifraorg.org>
- Newfoundland Lung Association www.lung.ca
- The Lung Association, Policy for Developing a Scent-free Workplace.

Retrieved on August 26, 2014 from

http://www.lung.ca/_resources/DevelopingaScentfreePolicyforaWorkplace.pdf

- Government of Newfoundland and Labrador Scent Policy. Retrieved on August 25, 2014 from http://www.exec.gov.nl.ca/exec/hrs/working_with_us/scent.html
- Consumer Packaging and Labelling Act
- Consumer Packaging and Labelling Regulations
- Food and Drugs Act
- Cosmetic Regulations
- Hazardous Products Act
- Consumer Chemicals Regulations
- Infection Prevention and Control education as per the CSA Z317.13-12 Infection Control during construction
- Canadian Standards Association Z8002 2013
- Construction – related Nosocomial Infections in Patients in Healthcare Facilities (2001) – guideline from Public Health Agency of Canada.
- Environmental Monitoring (Air Sampling with Enviro Test Paddles policy 440-PHA-SP-070
- Smoke-Free Environment policy ADM-135

Linkages

- Employee Incident and Accident Investigation Policy. HR-OH(o)-070
- Employee Incident and Accident Reporting Policy HR-OH(o)-080
- Return to Work Policy Statement Policy HR – OH(III)-040
- Hazard Recognition, Evaluation and Control Policy HR-OH(o)-040
- Occupational Health and Rehabilitation Referral Form (CH-1050)
- Environmental Monitoring (Air Sampling with Enviro Test Paddles policy 440-PHA-SP-070
- Smoke-Free Environment policy ADM-135
- Occurrence Reporting and Management QRM-080
- Working Alone or in Isolation HR-OH(O)-310

Key Words

Scent, fragrance, unscented, sensitivity, environmental, air born, odor, aroma, smells, VC, Volatile compounds

Definitions & Acronyms

Scented Products	Products that have, or may have, a detrimental effect upon the health of other persons and may include, but are not limited to, cosmetic products (for example: perfumes, aftershaves, colognes, shampoos and conditioners, soaps, body lotions and deodorants) and other products (for example: air fresheners and deodorizers, candles, potpourri, essential oils, some laundry detergents, fabric softeners and cleaning products).
Fragrance-free or Unscented products	Products that contain no fragrances or masking agents that hide the scents of other ingredients.
Individual(s)	Eastern Health employees, physicians, volunteers, students, agents.
Volatile compounds (VC)	A variety of natural and synthetic chemical compounds that can create scents and are breathed into the lungs or/and penetrate through the skin.
Representatives	<p>Individuals who are employed by the organization and not employed but perform specific tasks at or for the organization, including:</p> <ul style="list-style-type: none"> • Credentialed professional with medical appointment pursuant to Eastern Health's Medical By-laws (e.g. physicians) • Credentialed professional with non-medical appointment pursuant to Eastern Health's Non-Medical By-laws (e.g. midwives, dentists) • Students • Volunteers • Contractors or contracted workers who may be members of a third party contract or under direct contract with the organization <p>Individuals working at the organization but funded through an external source.</p>

Policy History

This policy replaces the following policies:

Legacy Board	Policy #	Policy Name	Date Revised
EH	415-SAF-DI-060	Scent Awareness	February 19, 2014

Key: EH – Eastern Health

THIS IS A CONTROLLED DOCUMENT. IF YOU ARE VIEWING A PAPER COPY, PLEASE CHECK THE INTRANET TO ENSURE YOU ARE READING THE MOST RECENT VERSION.