Traffic control inspections

What to expect during a WorkSafeBC inspection

Employers doing roadside work in British Columbia are responsible for keeping workers safe in work zones. A WorkSafeBC prevention officer may inspect the worksite to ensure that risks to workers are appropriately managed.

This guide explains:

- Your responsibilities as an employer
- What an officer may look at during a traffic control inspection
- What you should be ready to explain

At the worksite, you're expected to:

- Assess the risks
- Select controls
- Put those controls in place

You should then be able to show how you did that work and why the controls fit the work being done.

Roles and responsibilities

Road authority: This is the provincial or municipal body with control of the road. It may approve road use and set conditions. It may also decide whether closures, detours, or other road-use limits are not available.

Employer or prime contractor: The employer, the prime contractor, or both are in charge of or responsible for the work on the site. Whoever is in charge must:

- Assess the traffic risk
- Plan the work
- Select and use controls they are able to implement to protect workers
- Supervise the work
- Be able to explain why the controls fit the work and conditions

Employers are responsible for ensuring work is carried out in accordance with the Occupational Health and Safety (OHS) Regulation and aligned with the principles of the *Traffic Management Manual for Work on Roadways*.

WorkSafeBC officer: The officer assesses employer compliance with the *Workers Compensation Act* and OHS Regulation. Officers consider current site conditions, risk to workers, and applicable *Traffic Management Manual* requirements. They also consider whether the traffic control plan is being implemented as designed and whether it remains appropriate for current conditions.

A WorkSafeBC inspection

Traffic control inspections are generally initiated based on observations of risk to workers. Examples of observed risk include:

- Workers exposed to live traffic without controls appropriate to current conditions
- Traffic control that appears inconsistent with the *Traffic Management Manual*, the traffic control plan, or current site conditions
- Visible changes in conditions that may affect whether the planned controls remain effective

The officer's priority is to determine whether workers are protected from traffic. When the officer arrives, they'll typically:

- Establish who's in charge of safety on site: the employer, the prime contractor, or both
- Walk the site and talk about what they're seeing
- Ask to see your risk assessment
- Check whether the risk assessment matches current conditions
- Review your traffic control plan
- Confirm that traffic control implementation aligns with the traffic control plan and current site conditions

Officers have a duty to enforce the requirements in the *Workers Compensation Act* and the OHS Regulation. If the officer assesses that work is being carried out in a manner that is not in compliance with the OHS Regulation, they may issue corrective orders.

If the officer issues an order, they will explain the reason for the order and any required corrective actions. Orders are not intended to be punitive — they're meant to highlight unsafe conditions for correction. If you have questions about an order, discuss them with the officer. Employers, workers, unions, and other interested parties have the right to request a review of an order. Order review instructions are on the last page of an inspection report. Information about our review and appeal process is also available at worksafebc.com/review-appeal.

Information and documents

Documents are not a substitute for effective and properly implemented controls and safe work practices. Professionally prepared traffic management plans accepted by the road authority — together with applicable permits, restrictions, contracts, and engineering plans — establish important technical and operational context for the controls available. These documents support the employer's risk assessment and planning but do not replace the employer's obligation to assess current site conditions and protect workers within those constraints.

Some documents must be readily available at the work zone. Other documents or information may be requested and should then be provided within a reasonable time frame so the officer can assess for compliance.

Must be readily available at the work zone (examples only; list is not exhaustive)	**May be requested** (examples only; list is not exhaustive)

• The current traffic control plan and implementation details, accessible to workers at the work zone where required
• The risk assessment supporting the plan
	• Hierarchy of controls decisions
	  • These should include why a control higher in the hierarchy of controls was not implemented or practicable
	• Road authority contract
	• Road work authorization
	• Permit conditions or restrictions
	• Any other information relied on to explain why certain controls, closures, detours, or layouts were not available
	• Notes or records showing how a change in conditions was reviewed and addressed, if relevant
	• Enough information for the person in charge to explain the set-up, including:
	  • Worker locations
	  • Equipment
	  • Signs and devices
	  • Traffic control person placement
	  • Current changes in conditions

Explaining traffic control decisions

Controls mandated by the road authority

A road authority contract, service agreement, road work authorization, permit, or other applicable requirement may affect workplace controls (for example, by determining that a road must remain open). As the employer, you should be able to identify the applicable requirement and explain:

- What the limit was
- Where it came from
- How it affected the controls available

You may also be requested to provide information on any restrictions or conditions required by the road authority.

WorkSafeBC officers do not re-decide road authority engineering, permit, or road-use decisions at the worksite. The officer will consider those decisions, and a traffic management plan developed in accordance with the *Traffic Management Manual*, as relevant good-faith evidence of the controls available. The officer will assess whether the employer has met their obligations under the OHS Regulation when:

- Current site conditions suggest the implemented controls may not adequately protect workers
- The plan does not match the work being performed
- Conditions have changed

In these cases, the officer will first assess the employer's actions within the parameters established by the applicable road authority contract, service agreement, authorization, permit, or restriction, including whether the plan follows the *Traffic Management Manual* and remains appropriate for current conditions. The officer may request that employers engage with the applicable road authority to confirm any constraints on controls, including when site conditions vary from any planning documents.

Remember that employers are ultimately responsible for the safety of workers. As an employer, if you have concerns about how road authority requirements introduce unnecessary risk to workers, you must address these concerns with the road authority.

Controls determined by the employer

Employers should be ready to explain the risk assessment, traffic control plan, controls in place, applicable *Traffic Management Manual* requirements, road authority requirements, and current conditions. If supporting documentation is held off site, the officer may request it within a reasonable time frame based on the urgency and scope of the request.

As an employer, you must:

- Be familiar with the hierarchy of controls as described in the *Traffic Management Manual for Work on Roadways*
- Select the appropriate controls for circumstances at the worksite

During an inspection, you must be prepared to explain:

- How decisions on controls were made
- What traffic-related risks were identified
- How current conditions were considered
- Whether worker exposure to traffic could be eliminated
  - If worker exposure to traffic is not eliminated, explain why it was not practicable and how exposure was minimized per the hierarchy of controls.
- How any traffic control persons are positioned, equipped, oriented, trained, and supervised

If concerns need to be escalated

Most inspection questions can be resolved on site by:

- Reviewing current conditions
- Clarifying the traffic control plan
- Discussing the rationale for controls

However, additional discussion or information may sometimes be required. For example, key documentation might be held by parties who aren't at the worksite, or the officer may ask you to clarify information about traffic management measures with the road authority.

Field discussion	Employer or prime contractor follow-up	Road authority referral
Officer, employer, prime contractor, supervisor, and traffic control representative discuss what is happening on site and what information supports the controls that have been implemented.	If information is missing or unclear, the employer or prime contractor may need to provide supporting documents or clarification to the officer within a reasonable time frame.	If the concern is about a road authority decision or condition (due to the officer observing workers at risk), the officer may ask the employer or prime contractor to seek clarification from the road authority. This will typically involve decisions around using road closures, detours, or barriers.

If you have questions or concerns, discuss them with the officer first, then if needed escalate to their manager.

If a road authority has identified reoccurring or systemic issues, they are encouraged to reach out to their WorkSafeBC contact.

Questions to help you prepare for an inspection

- Are workers at risk from passing traffic?
- Has the risk assessment been completed?
- Does the risk assessment match current conditions?
- Does the traffic control plan reflect the work being done?
- Are the controls in place?
- Can the person in charge explain why the selected controls minimize the risk?
- If a higher-priority control was not used, can the employer explain why?
- If road authority limits affected the options, is that information available or obtainable?
- If traffic control persons are used, are they properly trained, positioned, equipped, oriented, and supervised?

Resources

- WorkSafeBC information and resources:
  - OHS Regulation Part 18: Traffic Control
  - WorkSafeBC inspections
  - Managing risk
  - Traffic
- Ministry of Transportation and Transit:
  - *Traffic Management Manual for Work on Roadways*