## Bed Bug Policy

### BACKGROUND

Many major cities in North America are experiencing a resurgence in bed bugs. This resurgence can be linked to changes in pesticide resistance, increased international travel, and a lack of awareness education.

Bed bugs can move between locations on clothes and personal belongings, easily transferring to new locations on purses, briefcases, clothes, shoes, books and other items. Bed bugs are carried into the workplace by employees, clients, vendors, custodial staff, visitors and others.

Bed bugs can have negative physical, social and mental health impacts for those who encounter infestations. Some employees may have an increased chance of exposure to bed bugs during the course of their work.

There are successful ways to reduce the spread of bed bugs that can be achieved through information, resources and training.

### POLICY STATEMENT

Employers have a duty, under the *Occupational Health and Safety Act* and its applicable regulations, to protect the health and safety of workers by taking every precaution reasonable in the circumstances.

The City of Hamilton is committed to protecting its employees through the provision of information, resources, and training to prevent exposure to bed bugs.

### PURPOSE

The purpose of this policy is to provide direction to City employees who may come in contact with bed bugs during the course of their employment, and to assist supervisors in managing and addressing cases of bed bugs in the workplace.

Departments may have their own policies and procedures in place that address their specific requirements and unique circumstances. Where specific requirements exist beyond corporate standards, departmental policies and procedures will supersede this policy.
SCOPE
This policy applies to all City of Hamilton employees including but not limited to regular, temporary and contract employees, volunteers, students and interns (collectively called “employees”) and contractors.

DEFINITIONS

Bed Bug
A wingless bloodsucking bug (Cimex lectularius) sometimes infesting houses and especially beds and feeding on human blood. The adult bed bug is oval and flat, and only about a 1/4-inch long. It does not have wings and crawls, does not jump. Adults are brown, but appear reddish-brown when engorged with blood and resemble an apple seed.

Infestation
The presence of bed bugs at a location in large numbers such that they are likely to cause damage or annoyance. Finding a single bed bug does not constitute an infestation.

TERMS AND CONDITIONS
The level of action required by Departments in response to this policy is to be determined through a risk assessment that will identify the risk of employees potentially coming into contact with bed bugs during the course of their work.

Risk assessment

All Supervisors:

- Determine the level of risk of exposure in your work environment and the tasks that employees perform – Table 1, then;
- Implement the intervention strategy in your work area – Table 2

Table 1:

<table>
<thead>
<tr>
<th>Level 1 – Risk of Exposure:</th>
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<tbody>
<tr>
<td>• Duties performed require employees to work in environments where there are known or reported bed bug infestations.</td>
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<table>
<thead>
<tr>
<th>Level 2 – Risk of Exposure</th>
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<tr>
<td>• Duties performed in environments where bed bug exposure is possible.</td>
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<th>Level 3 – Risk of Exposure</th>
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<tbody>
<tr>
<td>• Duties place employees at a similar level of exposure risk as that of the general public.</td>
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</table>
Responding to Employees Concerns

Table 2:

<table>
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<tr>
<th>Risk Level</th>
<th>Implement the following:</th>
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</table>
| **Level 1** | o Observe the Integrated Pest Management Program (IPM)  
               o Develop and communicate departmental or worksite specific policies and/or procedures as appropriate  
               o Provide appropriate personal protective equipment (PPE) and ensure employees are PPE trained  
               o Ensure that employees and supervisors have a method of contact to report bed bugs according to requirements  
               ✓ Refer to Bed Bug Guideline for information |
| **Level 2** | o Observe the IPM Program as specified in the City of Hamilton Bed Bug Guideline  
               o Develop and communicate departmental or worksite specific policies and/or procedures as appropriate  
               o Provide appropriate personal protective equipment (PPE) and ensure employees are PPE trained  
               o Ensure that employees and supervisors have a means of contact to report bed bugs according to requirements  
               ✓ Refer to Bed Bug Guideline for information |
| **Level 3** | o Provide employees access to the Bed Bug Policy and Guideline for information about bed bugs  
               o Communicate bed bug prevention strategies for the worksite  
               ✓ Refer to Bed Bug Guideline for information |

Bed bugs are not known to spread infectious disease. Exposure to bed bugs is not likely to endanger the health or safety of a worker. Employees with questions or concerns are to speak to their immediate supervisor.
It is not appropriate to withhold City services because of concerns over bed bugs.

There are preventative strategies that can be used to prevent bringing bed bugs into the workplace or into an employee’s home. The City of Hamilton supports preventative measures and will provide training and educational resources to assist employees in preventing the transmission of bed bugs. Financial compensation will not be provided.

**RESPONSIBILITIES**

**Supervisor/Manager**

- Review and implement the City of Hamilton’s bed bug policy and guideline
- Review and become familiar with this policy and the bed bug guideline
- Conduct assessments to determine Level of Risk which employees are at risk of exposure to bed bugs due to the nature and location of the work performed
- Provide information and training to all workers on bed bug identification and prevention based on the Level of Risk
- Develop an education and training strategy based on the Level of Risk conducted for each position.
- Ensure that all staff are made aware of this policy and the procedures, including their own individual responsibilities
- Follow the Integrated Pest Management (IPM) Program within the bed bug guideline
- If treatment is to occur ensure all necessary information regarding the pest control treatment method is communicated to all employees in the affected work area
- Provide appropriate Personal Protective Equipment (PPE) if required
- Contact Corporate Facilities anytime bed bugs are suspected or found in a City of Hamilton building
- Keep records of confirmed bed bug findings including details, exposures and employee reports
<table>
<thead>
<tr>
<th><strong>Corporate Human Resources Policy</strong></th>
<th><strong>Content Updated: 2015-09-28</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Health, Safety and Wellness</strong></td>
<td><strong>Approval: 2015-11-10</strong></td>
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<tr>
<td><strong>Policy No: HR-62-15</strong></td>
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<td>Page 5 of 6</td>
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### Employees

- Consult with your Health, Safety and Wellness Specialist for guidance and how to recognize, assess and control.
- Consult with Labour Relations in situations where employees refuse or are not following the bed bug policy and guidelines
- Access EFAP services as needed for support
- Adhere to and follow the bed bug policy and guidelines and/or their department procedures at all times when working in environments that are known or potentially can have bed bugs.
- Report any bed bug sightings, signs and exposures in the workplace immediately to their supervisor
- Report any bed bugs in your own home to your supervisor
- Report to your supervisor if you or a coworker have brought any bed bugs into the workplace
- Take every precaution reasonable to not bring bed bugs into the workplace from other sources.
- Access EFAP services as needed for support

### Facilities Help Desk

- Respond to calls from Supervisors and redirect to appropriate designate
- Liaise with the supervisor(s) of the affected work environment on the steps that will be taken to eliminate the bed bugs
- Maintain records of the reported bed bugs, locations and the action taken to eliminate the bed bugs.
- Provide annual summary of bed bug reports to the Manager of Health, Safety and Wellness

### Health, Safety and Wellness Specialist

- Assist Departments in risk assessment, training and communication regarding workplace bed bug exposures
- Obtain and retain current information regarding the risk of bed bug exposure and the potential impact of these exposures on
employees and make it available to the workplace parties (i.e. workers, supervisors, joint health and safety committees, health and safety representatives)

| Joint Health and Safety Committee | o Become familiar with the Bed Bug Policy and Guideline  
| o If a bed bug is found during inspections, advise supervisor/manager in the area immediately |

| Labour Relations | o Provide consultation as requested with regard to non-compliance |

| Contractors | o Adhere to this policy and the bed bug guideline  
| o Report to their City of Hamilton contact person, any signs or sightings of bed bugs |

**COMPLIANCE**

Failure to comply with this Policy and its associated Guideline may result in disciplinary action.

**REFERENCES**

*Bed bug Guideline*  
*Occupational Health and Safety Act*  
*Bedbugsinfo.ca*

**HISTORY**

The Bed Bug Advisory Group and Corporate Policy Review Group were consulted in the creation of this Policy.

This Policy was created 2015-09-28 and approved by the Executive Director of Human Resources and Organizational Development, in consultation with HRLT, on 2015-11-10