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Code Brown- NHNH

Policy:

To provide guidelines on how to contain and clean up spills of liquids, how to provide safe disposal of the materials, and whom to notify in the event of a spill.

Purpose:

The purpose of this **Code Brown Policy** is to define the response to an internal hazardous material spill or plumbing issue that staff at both Norfolk Hospital Nursing Home (NHNH) in compliance with WHMIS (Workplace Hazardous Materials Information System) guidelines are unable to manage safely. The primary goal is to ensure the immediate containment and safe management of the situation to protect the health and safety of patients, staff, and visitors. This policy aims to minimize any adverse impact on the facility and surrounding environment by ensuring an effective, coordinated response in the event of a chemical spill or plumbing issue that poses a risk to health, safety, or the environment.

Scope:

This policy applies to all staff, students, volunteers, contractors, and other personnel working at Norfolk Hospital Nursing Home. It is intended for use whenever a hazardous chemical spill occurs, either in the hospital or nursing home environment.

Definitions:

- **Code Brown:** A Code Brown alert is triggered when a hazardous material spill or exposure

occurs, requiring immediate action.

- **Chemical Spill:** A chemical spill is any uncontrolled release of a hazardous substance that could pose a risk to health, safety, or the environment.
- **Hazardous Spill:** Any unplanned or uncontrolled release of any hazardous material (biomedical, cytotoxic, chemical or radioactive) that can pose a potential safety or health risk to people or the environment
- **WHMIS:** The Workplace Hazardous Materials Information System provides guidelines and requirements for the identification, handling, and management of hazardous materials in the workplace.
- **CANUTEC:** is a national advisory service that assists emergency response personnel in handling dangerous goods emergencies on a 24/7 basis. The emergency centre is staffed by bilingual scientists specializing in chemistry or a related field and trained in emergency response. The emergency response advisors are experienced in interpreting technical information from various scientific sources including Safety Data Sheets (SDS) in order to provide pertinent and timely advice.
- **Essential Services** – Infrastructure required to continue business operations. These may include, but are not limited to, electricity, water, heating, cooling, ventilation, medical gas supply (oxygen, medical vacuum, medical air, nitrous oxide, nitrogen), telephone or computer network infrastructure (i.e. access to computer applications), hardware and/or software.
- **Incident Command(er)**- A Person (leader) responsible to the oversight and response of the identified incident. At NHHH this role will be assumed by the Director of Care or designate.
- **Incident Management System (IMS)** - A standardized approach to managing an emergency at an organizational-level. It allows leadership transition from existing roles in the organization to key roles required to manage an emergency situation, by delegating predefined areas of responsibility and establishing a clear chain of command.
- **Admin on Call (AOC)** including Manager on Call (MOC) and/or Administrator on Call (AOC) - On call (after hours) Manager or Director (during business hours would be coordinated through the most responsible Manager).
- **Reportable Spill to the Ministry of Environment (MOE):** a discharge of a pollutant that causes or is likely to cause an adverse effect and encompasses all of the following circumstances:
 - into the natural environment
 - from or out of a structure, vehicle or other container
 - that, in quality or quantity, is abnormal in light of all the circumstances of the discharge

Procedure:

1. Identification of Hazardous Material:

Identification of Hazardous Material:

- A hazardous chemical spill is identified when any material or chemical is released, leaking, or improperly handled in a manner that poses a threat to human health, safety, or the environment.

- Chemicals may include cleaning agents, pharmaceuticals, or other controlled substances.

Classification of Spill:

- **Minor Spill:** A minor spill refers to a small quantity of hazardous material that poses limited or no immediate threat to the health and safety of individuals or the environment. The spill can be contained and cleaned up by trained staff with appropriate personal protective equipment (PPE), without the need for large-scale evacuation or outside emergency response.
- **Major Spill:** A major spill involves a larger quantity of hazardous material that may pose an immediate or significant threat to health, safety, or the environment. This type of spill requires prompt action from emergency response teams, possible evacuation of affected areas, and external assistance as necessary to contain and mitigate the hazard.

2. Activation of Code Brown (Chemical Spill):

- **Step 1: Initial Response:**
 - Upon discovering a hazardous material spill, remove all individuals from the immediate area to a safe location away from potential harm.
 - Take immediate action to contain the spill and stop the spread of the substance by eliminating the source, such as turning off valves or sealing the container if possible.
 - Isolate the area and limit exposure to hazardous fumes or the risk of fire.
- **Step 2: Alert Switchboard and Activate Code Brown:**
 - Call the hospital switchboard at **1-911** (or the designated internal emergency number) and request that they announce "**Code Brown**" followed by the area of the spill.
 - The senior person, or designate, from Facilities or OHS, on site will act as the Spill Control Officer, coordinating activities according to instructions from the contractor or Fire Department.
- **Step 3: Await Arrival of Chemical Spill Response Team & Fire Department:**
 - Upon activation of Code Brown, staff must keep all non-essential personnel away from the spill area and await the arrival of the **Chemical Spill Response Team** (Plant Operations, Housekeeping/Laundry, and the Fire Department).

3. Roles and Responsibilities:

Staff, Credentialed Staff, Students, Contracted Workers & Volunteers

- Be aware of products used or stored in your work area, and how to manage unexpected exposure or spill
- Facilitate or participate in containment or re if it is within knowledge/scope
- Assist in local or department evacuations as required
- Continue operations (patient care, testing, etc.

Director of Care/ Assistance Director of Care or Designate at the NHHH:

- In the event of a chemical spill within the Norfolk Hospital Nursing Home, the Director of Care (DOC) or their Designate will assume command of the situation, prioritizing the immediate safety of residents and staff.
- The DOC or Designate will oversee the evacuation of residents from affected areas, coordinate with the Chemical Spill Response Team, and ensure that all necessary steps are taken to protect the health and safety of residents until the spill is fully contained.
- The DOC or Designate will ensure that all residents potentially exposed to chemicals are

promptly assessed for health risks and, if necessary, receive medical treatment.

After-Hours Provision

- In the absence of the DOC after hours, the Designate (most responsible person in charge) will assume responsibility for coordinating the response, ensuring safety measures are maintained, and following through with necessary procedures until the DOC or leadership designate return on-site.

Manager/Supervisor/Area Charge Person

- Escalate if remediation is outside of the scope of the involved team, or if there are changes
- Ensure ongoing operations

Security

- Report to impacted area and assist with perimeter and crowd control
- Document all activities through security processes

Facilities and Support Services

- Assess situation, environment and impact (asSME)
- Facilitate resolution (either internal or with External Spill Response Company)
- Ensure ongoing safety of employees and responders as per OHS standards and WHMIS

Communications

- Facilitate internal/external communications
- Assume Emergency Information Officer role at Emergency Operations Centre if required
- Activate Crisis Communication Plan as required

Manager/MOC – Incident Manager

- Oversee operations in collaboration with the ACP
- Check in with team and patients to ensure ongoing safety
- Coordinate with security to maintain facility access and control
- Act as the Incident Commander, and establish coordination and command of the immediate situation (or collaborate with SME to establish IMS structure)
- Identify if activation of Code Green is required? Provide updates to leadership, and escalate as required to Program Director

Chemical Spill Response Team:

Maintenance and Facilities:

- The senior person, or designate, from Facilities or OHS, on site will act as the Spill Control Officer.
- Will determine if they need to use a spill kit or determine if they need to bring in an external

contractor to assess.

- Respond to the spill by retrieving the **Mobile Spill Cart**, which includes the necessary PPE (jump suit, splash goggles, gloves, respirators, etc.).
- Ensure that the area is ventilated by increasing local exhaust and isolating air systems.
- Follow the MSDS (Material Safety Data Sheet) and WHMIS guidelines to neutralize and clean up the spill.

Support Services

- If an unknown substance is noticed, environmental services supervisor or designate will contact facilities/, maintenance for an an assessment and facilities management will determine if an external contractor is needed to a spill cleanup.
- Once notified of the Code Brown, Housekeeping Supervisors will organize staff to assist with spill cleanup based on the Spill Coordinator's directions.
- Ensure that all hazardous materials are handled and disposed of according to safety protocols.

Switchboard Operator:

- Upon receiving the chemical spill notification, the switchboard operator will announce **Code Brown** and indicate the affected area.
The operator will call the **Fire Department** and initiate the response team call-in.
- They will also notify the **Emergency Department** of the situation, providing details of the chemical involved.
- The Switchboard Operator will serve as the **Spill Coordinator**, relaying information to the Spill Control Officer and coordinating activities until the situation is resolved.

All Other Departments

- Inform staff of "Code Brown" alert and avoid activities in affected area until "Code Brown All Clear" is announced. Stay alert to possible Evacuation or Fire Procedure announcements.

4. Maintenance and Facilities are the designated Chemical Spill Response Team:

- **Maintenance and Facilities team:**
 - After receiving notification of the spill, personnel will retrieve the **Mobile Spill Cart** and respond to the spill area.
 - PPE must be worn to protect staff from chemical exposure.
 - The team will ventilate the area, neutralize the chemical spill as per MSDS guidelines, and initiate the clean-up process.
- **Chemical Spill Team Response Equipment:**

- **PPE:** Jump suits, face shields, chemical-resistant gloves, respirators, and other necessary protective gear.
- **Disposal:** Any hazardous materials used for cleanup must be disposed of in accordance with proper protocols.

5. Cleanup and Disposal:

Role of External Spill Response Company: The Incident Manager will work within the IMS structure and Subject matter experts to facilitate contact, contract, payment and support of outside agency response.

- The senior person, or designate, from Facilities or OHS, on site will act as the Spill Control Officer.
- Maintenance staff will clean up the spill if able. PPE as per MSDS to be worn, and follow proper procedures for containment, neutralization and cleanup of chemical spills (See appropriate SDS/MSDS Sheet)
- The chemical spill will be neutralized using appropriate materials, following WHMIS MSDS and Canutec guidelines.
- Cleanup will be documented and thoroughly assessed to ensure that no further risk remains.
- Once the spill is contained and cleaned, the **Spill Control Officer** will announce "**Code Brown All Clear**" to signal that the area is safe and the emergency response is complete.

6. Documentation of a Code Brown

- All Emergency Code activations are documented in the Incident Tracker Tool.
- The Incident Command will submit or delegate the submission of the details and subsequent debriefing and follow up in the Incident Tracker tool.
- Staff impacted by the event should complete and submit an Employee Incident using the Incident Tracker tool.
- If the Emergency Operations Centre is activated, documentation processes will be shared and stored electronically in the identified shared folder.

7. Post-Incident Review:

- Following a chemical spill, a review will be conducted to assess the response, effectiveness, and any potential gaps in the procedure.
- Staff will participate in a debriefing session to ensure future preparedness.
- Incident reports will be submitted to both the facility administration and local regulatory bodies, as required.

8. Training and Education:

- All staff will undergo **annual WHMIS training**.
- Regular **Code Brown drills** will be conducted to ensure that all personnel are prepared for a

hazardous chemical spill or exposure scenario.

9. Debriefing and Evaluation

- Upon completion of the Code Brown, the participants of all impacted units/department will hold a short huddle to debrief on the events of the Code Brown using the Debriefing Form as per our debrief policy.
- This quick check in allows team members to reflect on and identify any concerns or opportunities for quality improvement opportunities. The debriefing is led by the Team Leader/ Manager or delegate. This document will be scanned and included as part of the Incident Report.
- A formal organizational debriefing and completion of an Incident After Action Review and report submission will be arranged by the Incident Commander in collaboration with the impacted leadership team and the Employee Health Services Department.

References and Related Policies:

- <https://tc.canada.ca/en/dangerous-goods/canutec/services>
- Workplace Hazardous Materials Information System (*WHMIS*) policy
- NHHH Emergency Response Plan
- Debrief Policy
- NHHH IMS Policy
- NGH Code Brown Policy
- Joseph Brant Hospital Code Brown Policy

Approval Signatures

Step Description	Approver	Date
Senior Leadership Team Approval	Charlene Charles: NGH - ADMINISTRATIVE ASSISTANT	Pending
Joint Health & Safety Committee Approval	Belinda Marowah: Health & Safety Specialist	02/2025
H&S Specialist Approval	Belinda Marowah: Health & Safety Specialist	02/2025