

Initial Response to the Macdonald Campus Asbestos Investigation Report

Provost's Task Force on the Response to the Macdonald Campus Asbestos
Investigation Report

Sept 14, 2023

1 Scope and extent of response plan

This document outlines the Provost’s Task Force’s initial response to the findings and recommendations of the Final Report of the Macdonald Campus Asbestos Investigation, carried out by McGill Internal Audit (IA). This investigation focused on the events leading up to and following the detection of uncontained asbestos, in the context of two construction projects being carried out under asbestos conditions in the Raymond Building on the Macdonald Campus. The mandate of the Task Force (TF) is to ensure McGill University’s full and complete implementation of the recommendations stemming from this investigation.

The recommendations concern areas and processes that were involved in the specific events under investigation at Macdonald Campus. In the interest of safety across McGill, members of the TF have considered whether areas or processes other than those explicitly mentioned in the report should be examined or modified, when such processes or areas of activity can reasonably be thought to be creating risk situations like those outlined in the report. For example:

- Risks associated with management of contractors or lack of awareness of asbestos processes could also occur in renovation and maintenance work not supervised by the Project Management Office (PMO) in Facilities Management and Ancillary Services (FMAS). This includes work supervised by IT Services, maintenance work supervised by Building Services and FMAS Operations, work supervised by Student Housing and Hospitality Services (SHHS), and work supervised by the three other project offices within the VP A&F portfolio (Designated Projects Development Office, Fiat Lux and New Vic).
- Raising awareness of appropriate protocols within the Faculty of Agricultural and Environment Sciences should also be applied to other faculties, whenever work involving asbestos containing material (ACM) is involved.

A list of acronyms is at the end of this document.

2 Steps involved in the response

Timeline	Action	Details
September 18, 2023	Initial timelines for action on each recommendation	By September 18, all recommendations are classified as being addressed in the short (3 months), medium (6 months) or long (1 year) term. The classification is based both on the urgency of the intervention, to ensure a safe environment, and the consideration of feasible timelines.
September 18, 2023	Detailed action plan for short-term recommendations	By September 18, a detailed action plan is established for each short-term recommendation.
September 18, 2023	High level action plan for medium- and long-term recommendation	By September 18, a high-level action plan is established for each recommendation.
October 15, 2023	Detailed action plan for medium-term recommendations	By October 15, a detailed action plan is established for each medium-term recommendation.
October 30, 2023	Detailed action plan for long-term recommendations	By October 30, a detailed action plan is established for each long-term recommendation.

3 Reporting on progress

The Task Force will periodically report on progress to the Provost and Vice Principal (Academic). Furthermore, University governance will be appraised of the progress of the action plan throughout its execution, including through:

- An initial briefing of the HR committee of the Board of Governors
- Submission of a progress dashboard at each meeting of the Board of Governors, the Executive Committee, the Audit and Risk Committee and the Finance and Infrastructure Committee of the Board of Governors.
- Submission of a full progress report to Senate, the Board of Governors (or its Executive Committee), the Audit and Risk Committee and the Finance and Infrastructure Committee of the Board of Governors at the 3-month, 6-month and 12-month milestones corresponding to expected completion of short-term, medium-term and long-term action plans.

The Task Force will also publish monthly progress reports on a dedicated website accessible to the community.

4 Action Plan

Several of the recommendations suggest that staffing within McGill’s Environmental Health and Safety (EHS) unit and PMO may not be adequate to carry out their scope of work, which has increased in recent years. Two main avenues will need to be considered to follow up on recommendations: an increase in staffing or a decrease in the number of projects realized by the University. As the former may be hindered by recruitment market conditions, the latter may be an important option to explore. To do so, the TF will quickly engage in discussions with senior leadership, to understand the flexibility available in reducing the number of projects carried out in parallel. This will have to be considered in the framework of the current Master Plan, the level of Deferred Maintenance work required on campus, legal obligations, etc.

Given the complexity of some of these actions, it is expected that some of the action plans will need to be adapted as they progress. Such changes will be reported in the progress reports.

4.1 Classification of recommendations

Recommendation	Title	Term
FMAS-02	Asbestos incident response protocol	Short
AES-01	Protection and moving of equipment	Short
PMO-02	Communication of CNESST reports	Short
PMO-03	Safety officer	Short
PMO-04	Air circulation and ventilation systems	Short
PMO-08	Rigorous project monitoring	Short
PMO-09	Formally review PM’s capacity to deliver on mandate when important changes in scope	Short
PMO-10	Monitoring of the projects and PMs	Short
EOC-03	Communication	Short
FMAS-01	Integration of the communication silos	Medium
PMO-01	Enforcing health and safety controls on the construction site	Medium
PMO-05	Construction site logistics	Medium

PMO-06	Shared spaces	Medium
PMO-07	Anticipated delivery	Medium
EHS-01	Proper authority and establishing clear accountability measures	Medium
EHS-03	Comprehensive compliance monitoring plan	Medium
EHS-04	EHS capacity and backup for key roles	Medium
EOC-01	Roles and responsibilities	Medium
EOC-02	Policy Group	Medium
PMO-11	Formalizing the project risk management process	Long
PMO-12	Risk contingency additional to the 10% construction contingency	Long
PMO-13	Additional supervision by industrial hygiene consultants and clarification of their mandate	Long
EHS-02	Review and approval of the Asbestos Policy	Long
EHS-05	Awareness	Long
EHS-06	Enhancing health and safety culture	Long

4.2 Action Plans

Recommendation	Title	Task Force action item(s)	Stakeholders
FMAS-01	Integration of the communication silos	<ul style="list-style-type: none"> • Develop clear reporting, communication and escalation channels and document on appropriate website. (with FMAS) • Explore a ticketing system or similar technology to ensure occupants' concerns are recorded and addressed. (with FMAS) • Document standard operating procedures (SOPs) and train all stakeholders in these new SOPs. (with FMAS) 	Task Force AVP FMAS Director PMO
FMAS-02	Asbestos incident response protocol	<ul style="list-style-type: none"> • Develop appropriate response protocol that can practically be implemented, by October 30 and post on EHS website. (with FMAS and EHS) Ensure that appropriate staffing is in place to deploy response protocol at any point in time (including potential need for 24/7 response). Potential difficulties in recruitment may delay full execution. (with EHS) • Expand EHS training and awareness campaigns to ensure that all members of the community are aware of any processes that impact them. (Long-term action related to EHS-05). (with EHS) 	Task Force AVP FMAS Senior Director Campus Public Safety (CPS) Director EHS
AES-01	Moving of specialized equipment	<ul style="list-style-type: none"> • Ensure awareness of asbestos-related safety protocols in all faculties and units where work in the presence of asbestos is envisaged. (with PMO and EHS) • Make such awareness a part of the initial project meetings for all such projects; invite the chair of the relevant Faculty Safety committee(s) to the project launch meeting; include this in the project launch SOP. (with PMO) • Include reminders to faculty safety committees in regular communications from the University Health and Safety Committee (UHSC). (with AVP FMAS) • Principal Investigators receive initial training on safety protocols that is regularly updated. (with EHS) • Empower academic and administrative supervisors to enforce disciplinary measures in the case of blatant disregard for safety protocols. (with Faculty Deans) • Longer term awareness for the general population to be tackled under EHS-05. 	Task Force AVP FMAS Senior Director CPS Director EHS Faculty Deans
PMO-01	Enforcing health and safety controls on the construction site	<ul style="list-style-type: none"> • Strengthen Project Manager SOPs regarding oversight of the work of General Contractors (with PMO) • Assess the potential increased workload from the new SOP (with PMO) • Ensure there is a match between PM capacity and workload demands (with VP A&F) 	Task Force AVP FMAS Director PMO Director EHS VPA&F
PMO-02	Communication of CNESST reports	<ul style="list-style-type: none"> • Discuss with Legal Services the possible constraints surrounding an obligation to disclose by GCs • If legally feasible, for ongoing projects, ask all GCs to disclose immediately if any past CNESST reports have been received, and to disclose moving forward. (with PMO) 	Task Force Director PMO General Counsel

		<ul style="list-style-type: none"> • If legally feasible, work with Procurement Services to ensure that any future contracts contain obligation to disclose. • Include in PM SOP a regular check with the GC as to whether any CNESST reports were received (with PMO) 	Senior Director, Procurement Services
PMO-03	Safety officer	<ul style="list-style-type: none"> • See recommendation PMO-08 	Task Force Director PMO Senior Director, Procurement Services
PMO-04	Air circulation and ventilation systems	<ul style="list-style-type: none"> • Explicitly integrate in PM duties a monitoring of air flow in projects, including onsite inspections. (with PMO) • In collaboration with Procurement Services, ensure that the GC contract explicitly addresses the issue of ventilation and the GC's role in ensuring appropriate ventilation. (with PMO) 	Task Force Director PMO Senior Director, Procurement Services
PMO-05	Construction site logistics	<ul style="list-style-type: none"> • Develop new principles for project implementation in terms of logistics, shared space and segregation. (with PMO) • Work with Academic and Administrative leadership to make sure principles are understood and adhered to • PMO-05, PMO-06 and PMO-07 to be addressed jointly. 	Task Force AVP FMAS Director PMO VP A&F PVPA Faculty Deans
PMO-06	Shared spaces	<ul style="list-style-type: none"> • See PMO-05. PMO-05, PMO-06 and PMO-07 to be addressed jointly. 	Task Force AVP FMAS Director PMO VP A&F PVPA Faculty Deans
PMO-07	Anticipated delivery	<ul style="list-style-type: none"> • See PMO-05. PMO-05, PMO-06 and PMO-07 to be addressed jointly. 	Task Force AVP FMAS Director PMO VP A&F PVPA Faculty Deans
PMO-08	Rigorous project monitoring	<ul style="list-style-type: none"> • Examine current PM work description as it pertains to project oversight and safety, including ensuring a qualified construction safety officer is hired (PMO-03). • Propose additional oversight and control roles and points, as part of existing documentation or additional SOPs. (with PMO) • See PMO-01 for discussion on capacity. 	Task Force AVP FMAS Director PMO Director EHS VPA&F
PMO-09	Formally review PM's capacity to deliver on	<ul style="list-style-type: none"> • Create upper bounds for the workload of individual PMs; exceeding such bound would require senior-level approval from AVP FMAS or VP A&F. (with PMO) 	Task Force AVP FMAS

	mandate when important changes in scope	<ul style="list-style-type: none"> • See PMO-01 for discussion on capacity. 	Director PMO VPA&F
PMO-10	Monitoring of the projects and PMs	<ul style="list-style-type: none"> • Review with PMO/FMAS current practices for external PM oversight, and related workload. (with PMO, FMAS) • Propose added oversight points and reports as appropriate. (with PMO, FMAS) • See PMO-01 for discussion on capacity. 	Task Force AVP FMAS Director PMO
PMO-11	Formalizing the project risk management process	<ul style="list-style-type: none"> • Coordinate efforts with PMO, Legal Services, Risk Advisory and Insurance Services to develop and implement new framework for risk and contingency; benchmark with peer universities and organizations. 	Task Force AVP FMAS Director PMO Director, Risk Advisory and Insurance Services General Counsel VP A&F
PMO-12	Risk contingency additional to the 10% construction contingency	<ul style="list-style-type: none"> • See PMO-11. 	Task Force AVP FMAS Director PMO Director, Risk Advisory and Insurance Services General Counsel
PMO-13	Additional supervision by industrial hygiene consultants and clarification of their mandate	<ul style="list-style-type: none"> • Based on outcomes of PMO-11, review the mandates of the industrial hygiene consultants in all of our projects and expand mandate where necessary compatible with the risk level of each project. • Work with Procurement Services to develop template contracts for industrial hygiene consultants. (with PMO) 	Task Force Director PMO Senior Director, Procurement Services
EHS-01	Proper authority and establishing clear accountability measures	<ul style="list-style-type: none"> • Examine EHS's authority and mandate to strengthen its role and authority. • Ensure staffing is in place to fulfill new mandate (see EHS-04). • Recommend structures to be put in place to ensure that non-compliance with EHS directives has consequences, such as impact on performance evaluations or disciplinary measures. (with VP A&F) • Ensure proper governance mechanisms are put in place and enforced. (with EHS, Campus Public Safety, VP A&F, Secretariat) 	Task Force AVP FMAS Senior Director CPS Director EHS VP A&F
EHS-02	Review and approval of the Asbestos Policy	<ul style="list-style-type: none"> • Propose an updated policy. (with EHS) Sponsor approval of new policy through governance. (with VP A&F) 	Task Force AVP FMAS Senior Director CPS Director EHS VP A&F

EHS-03	Comprehensive compliance monitoring plan	<ul style="list-style-type: none"> • Create a comprehensive plan for monitoring compliance with relevant legislation regarding asbestos as well as McGill process controls such as the Internal Responsibility System. (with EHS) • Ensure decisions about EHS staffing (EHS-04) and mandate (EHS-01) account for the implementation of this plan. 	Task Force AVP FMAS Senior Director CPS Director EHS VP A&F
EHS-04	EHS capacity and backup for key roles	<ul style="list-style-type: none"> • Coordinate with stakeholders a review of staffing needs and devise a practical plan to achieve target staffing, taking into account needs that may arise from a new mandate. 	Task Force AVP FMAS Senior Director CPS Director EHS VP A&F
EHS-05	Awareness	<ul style="list-style-type: none"> • Develop and deploy awareness and communications plans for all members of the community, adapted to their roles and responsibilities. (with EHS, FMAS) 	Task Force Senior Director CPS Director EHS VP A&F Communications Manager, FMAS
EHS-06	Enhancing health and safety culture	<ul style="list-style-type: none"> • Create plan for enhanced safety programing and ensure appropriate staffing and budgets are put in place. (with EHS, FMAS) 	Task Force Senior Director CPS Director EHS VP A&F Communications Manager, FMAS
EOC-01	Roles and responsibilities	<ul style="list-style-type: none"> • Create documentation and training to clarify roles and responsibilities for all EOC members. (with Office of Emergency Management – OEM) 	Task Force Senior Director CPS Senior Advisor, Emergency Management & Preparedness
EOC-02	Policy Group	<ul style="list-style-type: none"> • Propose revised activation criteria for groups involved in McGill’s emergency response, including the Emergency Operations Centre. 	Task Force Senior Director CPS Senior Advisor, Emergency Management & Preparedness
EOC-03	Communication	<ul style="list-style-type: none"> • Develop principles and guidelines to ensure EOC communications provide ongoing reassurance, continuous transparency as well as accurate and timely information. (with Communications lead for EOC) • Review the criteria for use of the emergency management system. (with CPS, OEM) 	Task Force Senior Director CPS Senior Advisor, Emergency

			Management & Preparedness Communications Officer, EOC
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4.3 List of acronyms

- CPS Campus Public Safety
- EHS Environmental Health and Safety
- OEM Office of Emergency Management
- EOC Emergency Operation Center
- FMAS Facilities Management and Ancillary Services
- IC Incident Command
- PG Policy Group
- PMO Project Management Office
- SOP Standard Operating Procedure
- TF Task Force
- UHSC University Health and Safety Committee