



Guide to
Workplace
Health & Safety
Programs



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Guide to Workplace Health & Safety Programs

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The Occupational Health & Safety Program: Your Recipe for a Healthier, Safer Workplace

Introduction

About this Guide

This guide is for employers, workers, Joint Occupational Health and Safety (JOSH) committees, and Health & Safety Representatives. It will help you prepare and maintain your written occupational health and safety (OHS) program. This guide describes the elements of a formal OHS program, and the roles and responsibilities of those preparing and maintaining the program.

What is an OHS Program?

To create a safety culture, you need a plan. An OHS program is an organized, written action plan to identify and control hazards, define safety responsibilities, and respond to emergencies. The objective of a program is to integrate safety and health into all work practices and conditions.

Having a safe work environment where prevention is the key to an organization's success is important to all workplace parties – employers, workers including supervisors and managers, and JOSH Committees and Representatives. When safe work practices are a part of the everyday work routine, there are huge savings in human and financial costs to a business.

Legal Requirement

An OHS program is required under the *Occupational Health and Safety Act* for provincially-regulated employers on Prince Edward Island with 20 or more regularly employed workers.

*23.(1) Where 20 or more workers are regularly employed
(a) by an employer other than a constructor or contractor; or
(b) directly by a constructor or contractor,
the employer, constructor or contractor shall establish, and review at
least annually, a written occupational health and safety program, in
consultation with the committee or representative, if any.*

The program requirement is tied to employers, not workplaces. Therefore, an employer who has three workplaces, with eight employees in each location, will require three different health and safety representatives and one overall OHS program that covers all three locations.

Constructors and contractors must have a program if they have 20 or more workers directly employed. Sub-contractors and their employees working for the constructors would not be counted in the number.

This Guide will help you comply with the OHS requirements for your workplace, but it does not replace the *Occupational Health and Safety Act* and Regulations. For full specific requirements related to these topics, refer to s. 23 of the Act.

Internal Responsibility System

The OHS program promotes the internal responsibility system on which the *Occupational Health and Safety Act* is based. Under the internal responsibility system, the people doing the work are responsible for creating a healthy and safe workplace. No matter where or who the person is within the organization, they can address safety in a way that fits with what they do. Every person takes initiative to improve health and safety on an on-going basis.

The Occupational Health and Safety division cannot reasonably regulate the safety activities of each and every Island workplace; therefore, the employers and workers must participate in and take responsibility for their own safety. This is done, in part, through a formal written OHS program.

Who is Responsible for the Program?

A health and safety program must provide a clear outline of responsibility and accountability for all workers regarding health and safety in the workplace.

It is the employer's responsibility to **develop and implement** an OHS program. An effective program will help reduce injuries and costs, and will help defend an employer against any charges under the *Occupational Health and Safety Act*.

It is the responsibility of the JOSH Committee (or safety representative) to **monitor** the effectiveness of the program. Committee members are encouraged to **contribute** to the development of the program by conducting workplace inspections, and making and following up on recommendations.

The Health and Safety Coordinator (if any) **maintains** the documentation, creates written work procedures with worker and committee input, and ensures training is done and records of training are kept.

Safety is everyone's responsibility.

Getting Started

What does an effective Occupational Health and Safety Program look like?

General Responsibilities

Responsibilities of workers and employers will vary depending on the industry and nature of their work. However, across all industries and sectors, there are general responsibilities expected within an OHS program at all operational levels:

Position	General Responsibilities
Senior Management/Leadership	<ul style="list-style-type: none"> • Provide policy direction and planning • Review control information • Delegate responsibility and authority • Allocate budget • Cooperate with safety committees and representatives • Hold line managers accountable for safe production • Make sure line managers have adequate resources and support • Assist the health and safety committee or representative
Line Management	<ul style="list-style-type: none"> • Train operators and others • Supervise employees to ensure safe work procedures are followed correctly • Communicate hazard information and control procedures • Consult with employees on matters of health and safety • Provide feedback to senior executive • Cooperate with the JOSH committee or representative • Hold accountable those managers, supervisors, and workers reporting to them
All Employees	<ul style="list-style-type: none"> • Comply with company rules and procedures • Wear personal protective equipment as required • Use machinery, equipment, and materials only as authorized • Follow job procedures • Report hazards, unsafe conditions or actions to your supervisor • Report incidents • Report all injuries for first aid, no matter how minor • Cooperate with the JOSH committee or representative
JOSH Committees	<ul style="list-style-type: none"> • Hold monthly meetings; record and post minutes • Make recommendations on health and safety issues • Carry out inspections, investigations, and direct worker safety concerns as appropriate • Assist with the development of the OHS program, the health and safety policy, and safe work procedures
Health & Safety Representatives	<ul style="list-style-type: none"> • Make recommendations on health and safety issues • Take employee health and safety concerns to management

Building a Health and Safety Program from the Ground Up

There are many factors to consider when developing a health and safety program for your workplace. This section describes the components of an effective program.

Effective programs start with management commitment.

For a health and safety program to be effective, there must be an obvious, solid commitment from top management. Research indicates that 85% of injuries/incidents are caused by factors that only management can control. Workers will do what management says is important. When the message is that working safely is truly important, then work will be done safely. The literature on health and safety management shows a strong link between a company's health and safety record and its productivity and quality. Lead by example.

Programs and Due Diligence

Due diligence means taking all reasonable care to protect the well-being of employees or co-workers. To meet the standard of due diligence, you must take all reasonable precautions in the circumstances to carry out your work safely. Failure to show that you have been duly diligent in complying with occupational health and safety legislation can result in significant penalties.

Consider three main factors of due diligence:

- 1) Was the event foreseeable? (Eg. Was the event so unlikely that you or your peers would never have expected it to occur?)
- 2) Is the event preventable? (Eg. Were the hazards identified? The workers trained and supervised? Were they disciplined for safety infractions? Were safe work procedures enforced?)
- 3) Did you have control over the circumstances? If it is within your authority to control the hazard, did you do it?

Due diligence cannot be "made up" after the fact.

A well-written, well-practiced OHS program that controls specific hazards in your workplace may form the basis of a defence of due diligence. If the OHS program elements are in effect and working well, a due diligence test can be more easily met.

Legal Requirements

The *Occupational Health and Safety Act* clearly outlines what components your OHS Program needs to include. Section 23(3) of the Act sets out those requirements and will be quoted throughout this guide where it applies.

Here is your checklist for the required components of the OHS Program:

#	Program Component	Function
1	OHS Policy	Statement of the aim of the program and the responsibilities for health and safety
2	Joint Occupational Health and Safety Committee or Representative	To work closely with the employer to promote a positive health and safety culture
3	Regular Workplace Inspections	To identify and correct unsafe acts and conditions with potential to cause injury or disease
4	Incident/Injury Investigation	To identify the cause of an injury or disease to prevent similar unsafe re-occurrences
5	Hazard Identification System	To recognize, evaluate, and control hazards in the workplace
6	Written Work Procedures	To describe how to carry out work tasks safely
7	Training and Orientation	To ensure workers understand and take their OHS responsibilities seriously
8	Supervision	To enforce safe work practices
9	Record Keeping System	To establish due diligence and demonstrate that all components of the health and safety program is in place and used
10	Evaluation Process	To know if the program is working and to keep it current

Step 1: Create a Health and Safety Policy

The Occupational Health & Safety Policy

Your commitment to health & safety

Safety starts with awareness and understanding. Putting your company safety policy on paper with a signature shows leadership's personal and corporate commitment to a safe workplace. It lets employees know that safety is a priority throughout the organization, and that unsafe practices are not acceptable.

The health and safety policy should be an absolute priority, and it should be treated as one of the most important policies within your organization.

The OHS Policy is a key starting point to establishing an effective OHS program. An employer's commitment to health and safety determines the level of health and safety in the workplace in the same way that commitment to quality determines the quality of the end product. Putting this commitment in the form of a written policy sends a clear message from top management on the value of the safety of its workers.

A comprehensive OHS Policy should:

- Express management's commitment to protect the health and safety of employees.
- Clearly identify the objectives of the program.
- Communicate the organization's basic health and safety philosophy.
- Outline who is accountable for occupational health and safety programs.
- Outline the general responsibilities of all employees.
- Be absolutely clear that health and safety will not be sacrificed for anyone's convenience.
- Be absolutely clear that unsafe behaviour will not be tolerated.

A good policy gives clear direction.

A health and safety policy is a living, breathing thing. It will continually evolve over time as job functions and business activities change.

Most importantly, the policy must be *brought to life*. A company's OHS policy is a statement of principles and general rules. They must be backed up with **action**.

The sample policy at **Appendix "A"** provides a more detailed format for addressing the required elements.

Tips for turning your safety policy into action

- Have your owner, president, or CEO sign the policy.
- Ensure it is written in clear language.
- Ensure every employee sees a copy and understands it.
- Ensure it is communicated to new employees as part of the hiring process.
- Ensure it is dated, reviewed, and signed annually.

Keep in mind that a policy sitting in a filing cabinet does not change anything. Even the best policy will be ineffective if it's not properly used – and that starts with communicating it.

To put your policy into effect, be sure that:

- Everyone in the workplace reads the policy
- Everyone understands their roles and responsibilities
- Accountability is clearly stated
- All levels of management support and enforce the policy
- You provide adequate human and financial resources to support the policy
- You establish a process for setting up and reviewing procedures and programs

For more information, refer to the [Guide to a Workplace Health and Safety Policy](#) available on our web site (www.wcb.pe.ca) or refer to Section 24 of the *Occupational Health and Safety Act*.

Step 2: Establish a JOSH Committee or a Health and Safety Representative

The Joint Occupational Health and Safety (JOSH) Committee

A critical partner in creating a healthy and safe workplace

23.(3) The program shall include;

(c) provision for the establishment and continued operation of a committee required pursuant to this Act, including maintenance of records of membership, rules of procedure, access to a level of management with authority to resolve health and safety matters and any information required under this Act or the regulation;

(d) provision for the selection and functions of a representative where required pursuant to this Act, including provision for access by the representative to a level of management with authority to resolve health and safety matters.

A JOSH committee is a group of worker and employer representatives working together to identify and solve health and safety problems at the work site. The primary purpose of the committee is to help everyone in the workplace communicate on health and safety issues. An effective committee is a vital component of your OHS program, and will help reduce losses associated with injury and illness.

A Health and Safety representative is a worker, with no supervisory duties, who is responsible for advising management on matters regarding health and safety issues at the workplace. This may include hazards, complaints, personal protective equipment, safety policy and program, and general improvements to make the workplace safe for all workers.

A committee is required in a workplace employing 20 or more workers on a regular basis. Smaller employers, specifically those employing between 5-19 workers, are required to designate a health and safety representative.

When carrying out their functions with respect to a program, both the committee and representative must be granted access to a level of management with authority to resolve occupational health and safety matters. Such access is not a privilege but a legal requirement.

JOSH Committee and Representative Role in Programs

Although the employer or a designated employer representative (such as a safety co-ordinator) is responsible for **developing** the health and safety program, the committee or representative's **participation** in the development and implementation is essential if the program is to work effectively.

The duties and tasks of the JOSH members and/or representative should be specified in writing, posted in the workplace, and a copy issued to the representative or to each committee member. The function of the JOSH committee may be written into the committee's terms of reference. Duties should be discussed, either individually with a representative or with the committee, to ensure everyone understands their role and its importance.

JOSH Committees: The following are some activities common to committees and representatives with respect to safety programs in the workplace:

- Participate in the development and implementation of programs
- Consider and help resolve worker health and safety complaints
- Help train new workers
- Participate in identifying and controlling workplace hazards
- Participate in incident investigations
- Make health and safety recommendations to management
- Carry out regular workplace inspections
- Advise on personal protective equipment
- Post JOSH meeting minutes and keep them current
- Monitor the safety program for effectiveness
- Help develop safe work procedures
- Investigate work refusals

Effective safety committees help reduce workplace injuries.

For additional information, refer to the following guides at www.wcb.pe.ca or by calling 902-368-5697 or toll free in Atlantic Canada 1-800-237-5049.

- *“Guide to Joint Occupational Health and Safety Committees”*
- *“Guide to Health and Safety Representatives”*

Step 3: Establish and Record Regular Workplace Inspections

Workplace Inspections

Making Sure That Your Health and Safety Program Is Working

Now that a Committee (or Representative) has been established, it is necessary for the employer to ensure that regular workplace inspections are completed. Inspections can be carried out by supervisors, the joint health and safety committee, the representative or any other trained person.

*23.(3) An occupational health and safety program shall include
(e)(ii) procedures and schedules for regular inspections.*

Use your hazard identification system (see Step 5) and incident history to help identify areas to inspect. Also, there are examples of checklists available at www.ccohs.ca and through the Occupational Health and Safety Division of the Workers Compensation Board at 902-368-5697. The work site can be divided into sections, each with its own inspection schedule.

Here are the steps to follow for an inspection:

1. Observe tasks being done.
2. Ask questions, make notes.
3. Examine equipment. Check maintenance records.
4. Check that the work area is tidy, that tools have a storage place.
5. Look for what might not be obvious such as fire doors not opening outward or being blocked.
6. Establish clear procedures that direct when and how often each inspection is to be done. Some tasks may require daily or start-of-shift inspections. Note who will do them and who specifically will follow up.
7. Establish a schedule based on the frequency of work, degree of hazard, and a history of incidents or near misses.
8. Keep records of all inspections, findings, recommendations and follow-up.
9. Ensure the entire committee (or representative) sees the reports and follow-up.

Recommendations **must** be followed up to ensure that action was taken and that it was effective. Also, sometimes the recommendations themselves may cause an unsafe condition that was not planned. It is important to indicate who will do the follow-up, both in any training schedules and on posted schedules, as well as when and where the inspection or action will be recorded. If a serious hazard is noted (e.g., from daily inspection of a forklift), list who will be responsible for immediate control.

See **Appendix “B”** for a Workplace Inspection Report Form

Step 4: Incident Investigation

Incident Investigation

Finding the Real Cause of an Incident or Injury

*23.(3) An occupational health and safety program shall include
(g) a system for prompt investigation of hazardous occurrences to determine
their causes and the actions needed to prevent recurrences.*

Regular workplace inspections are meant to catch unsafe conditions before they lead to an incident. However, when an incident occurs, it is vital to investigate it so that future incidents can be prevented. Workplace injuries are preventable but if an incident occurs, an investigation should be conducted to find the root cause(s). Finding the root cause will help the Committee or Representative recommend action to prevent it from happening again. Look at all the factors leading up to the incident as there will likely be several causes.

It is important that the employer, in consultation with the Committee or Representative, develop a set of procedures to follow for the incident investigation process. *The intent of the investigation is to prevent a recurrence, NEVER to lay blame.*

Serious Injuries

Serious injuries must be reported to the Occupational Health and Safety Division of the Workers Compensation Board. Remember—in the case of a critical injury, it is an offence to disturb the scene of the incident before the OHS officer arrives except to prevent further injury or damage. Report serious or critical workplace injuries to the OHS 24-hour emergency response number at 902-628-7513.

What About Near Misses?

There is great benefit in conducting near-miss investigations. Near misses often result in an injury at some point. Research quoted by the Industrial Accident Prevention Association indicates there are 189 incidents for every three time-loss injuries. Recording near misses can be as simple as a keeping a notebook for workers to record minor incidents or near misses. The Committee or Representative can then review the notebook and make recommendations for change.

Remember that incidents and near misses are warning signs that something is wrong in the workplace. The purpose of an investigation is to determine the root cause of incidents and to make necessary changes. An investigation form should be completed by the Committee or Representative (or other person doing the investigating), and recommendations should come out of the investigation.

See **Appendix “C”** for an Incident/Injury Investigation Report Form

Step 5: Creating a Hazard Identification System

What is a Hazard Identification System?

Looking closely at work tasks to recognize potential hazards

23.(3) An occupational health and safety program shall include:

- (e) a hazard identification system that includes*
 - (i) evaluation of the workplace to identify potential hazards*
 - (ii) procedures and schedules for regular inspection,*
 - (iii) procedures for ensuring the reporting of hazards and the accountability of persons responsible for the correction of hazards, and*
 - (iv) identification of the circumstances where hazards must be reported by the employer to the committee or representative, if any and the procedures for doing so;*
- (f) a system for workplace occupational health and safety monitoring, prompt follow up and control of identified hazards.*

A hazard is anything (e.g. a condition, situation, practice, or behaviour) that has the potential to cause harm—including injury, disease, death, environmental or property and equipment damage.

A Hazard Identification System is a written list of all the hazards in the different work areas, and it describes ways to control those hazards. Essentially, it involves looking closely at work tasks to recognize where potential injury and harm could occur and be controlled. For example, workers on a production line may have a long reach to bring product closer to them on the line. This over-reaching may cause workers to experience shoulder and back pain. In a hazard identification system, this hazard would be noted and it may be recommended that the workstation be redesigned at a minimal cost so workers do not reach too far to access the product.

A careful examination of work practices in your workplace provides information that is essential for building an effective health and safety program. By using the Hazard Identification System in your workplace, you will identify high risk tasks, break down each task into steps, identify potential hazards in each step, and suggest ways to control or eliminate the hazard.

Getting Started

To start the hazard identification process, many companies choose to hire a consultant. If possible, choose one with experience in your type of business. They can help you set up the initial hazard identification plans and work procedures and put a monitoring system in place.

If you choose to do it yourself, you should assign one person to co-ordinate the process. This person may be a supervisor familiar with the work and needs to work cooperatively with people doing the work. The coordinator must use worker input to identify the hazards in each task, find the safest way to work, and help write and train everyone in the correct procedures.

Identifying Potential Hazards

For this process to be effective, it is critical that the people doing the work contribute what they know. The first step is identifying potential hazards.

Ideally, all jobs in your company should be subjected to the hazard identification analysis. In some cases, however, there simply is not enough time to do a thorough analysis. Also, each hazard identification analysis needs updating whenever any equipment, raw materials, processes, or the environment change. For these reasons, it is usually necessary to narrow down which jobs are to be analyzed.

To begin the process of identifying potential hazards, use the following steps.

1. List all tasks

Identify and list what tasks/jobs are done at your company, including non-routine activities such as maintenance, repair, or cleaning. If some of the work will be contracted out, the contractors can be responsible for their own work analysis but you are ultimately responsible to ensure that their hazard analysis gets done.

2. Identify “Critical” Tasks

Critical tasks are the high risk ones. It is not always practical to break down every task/job. Identify which tasks have a high risk by using your experience, injury/incident history and estimated potential for serious consequences if something goes wrong. Ask the people who do the work for their input.

3. Break the Critical Tasks into Steps

Break the task into its step-by-step parts in the correct sequence. Do this by watching the job as it is being done. Consult with the person doing the job. Review each step:

1. Are they all necessary?
2. Can they be simplified?
3. Combined?
4. Substituted?

This can contribute to better productivity as well as improved health and safety.

4. Identify Potential Hazards in Each Step

Use injury/incident experience, near-miss information, observation of the worker and equipment, as well as discussion with the workers doing the job. List the things that could go wrong. Assess the work environment. What hazardous materials are being used? Are there concerns with heat or cold? Are there lighting, ergonomic or noise considerations? Do the seasons or conditions affect the way work is to be done?

5. Find Ways to Control or Eliminate the Hazards in Each Step.

List what must be done to make the task safer and more efficient. Is there a way to substitute or eliminate the task? Can it be altered to reduce or remove the risk?

The Hazard Identification System or job hazard analysis identifies high risk tasks, breaks down each task into steps as above. This process should result in a record of hazards. The next step is to use the job hazard analysis as a basis for all procedures, training, orientation, and monitoring requirements.

See **Appendix "D"** for examples of hazards, ways to control them, and the resulting work procedures that are developed from the process.

Step 6: Develop Written Work Procedures

Work Procedures

Writing Down the Right Way to Perform Each Task

Work procedures are step-by-step instructions that describe the way a task must be done for improved health, safety, efficiency or accuracy. Here's what the *Occupational Health and Safety Act* says about making written work procedures a part of your company's OHS program:

*23.(3) An occupational health and safety program shall include
(b) provisions for
(i) the preparation of written work procedures required to implement health and safety work practices, including those required pursuant to this Act, the regulation, or by order of an officer, and
(ii) the identification of the types of work for which the procedures are required at the employer's workplace.*

Using the results found from the hazard identification process in the previous step, write the correct work procedures for each critical task identified.

Information to include in a safe work procedure:

- The normal sequence of events and actions required to perform the work safely.
- Any hazards involved in performing the work, such as hazardous chemical or equipment and tools with potential hazards, and ways to eliminate or minimize the risks.
- Personal protective equipment required.

Because workers know their job tasks better than anyone, they should be involved in developing safe work procedures. This will also give workers a sense of ownership for their own work and for the OHS program.

Once you have the results of regular work inspections from the Committee or Representative, have carried out the hazard identification process, and have consulted with your injury records and with workers doing the tasks, you are ready to begin writing safe work procedures.

Writing a Safe Work Procedure

1. Start with a statement outlining the task.

Eg. "Handling garbage safely – Protecting workers from injuries associated with the IMPROPER disposal of waste."

2. Write what to do in step by step instructions. Avoid describing what not to do.

Eg. "Hold garbage bags by the top of the bag, away from your body" (rather than "Don't hold garbage bags against your body.")

3. Include a brief explanation of why the work must be done in this way. Procedures will more likely be followed if the reasons are understood.

Eg. "Handling garbage safely will help prevent contact with sharp objects and other items improperly discarded in waste."

4. Include the requirements for personal protective equipment. Remember that removing substituting or reducing the hazard is preferable to the use of personal protective equipment.

Eg. "Wear puncture-resistant and liquid-resistant gloves at all times when handling waste."

5. Consider the environment in which the work will be performed. How will this impact on the work?

Eg. "In areas where more waste is generated, frequently change bags to prevent them from getting too full. This will also make them lighter and easier to hold away from the body."

6. Write the controls as actions.

Eg. Clean up work space. Test that the base for scaffold is secure.

Note: Make sure that everyone reads and approves the procedure, in particular the person(s) doing the job. Consider having the Joint Health and Safety Committee or Safety Representative review it.

Compliance with these rules should be considered a condition of employment. Supervisors are responsible for monitoring and enforcing the use of proper procedures. Accurate written procedures, with records of training and supervision, are a big part of a due diligence defence.

See **Appendix "D"** for sample safe work procedures.

Work Procedures for Reporting Hazards

For additional consideration, the law also states:

23.(3) An occupational health and safety program shall include

(e)(iii) procedures for ensuring the reporting of hazards and the accountability of persons responsible for the correction of hazards, and

(iv) identification of the circumstances where hazards shall be reported by the employer to the committee or representative, if any, and the procedures for doing so.

Therefore, there must be a system in place to ensure hazards get reported and that everyone knows who to report them to and who is responsible for correcting the hazard. These details should be included in your company's work procedures as part of your OHS program.

In addition to workplace procedures, you will need to establish procedures for:

- Emergency response
- Training and orientation
- Reporting near misses and incidents
- Reporting on inspections and follow-up
- Discipline
- Monitoring and follow-up

An effective OHS program ensures all workplace parties are educated in their responsibilities for following safe work procedures. It also ensures workers are trained in how to protect their own health and safety as well as others at or near the workplace. Ensuring all workers take this responsibility seriously shows that the employer is serious about preventing injury and illness in the workplace.

What about Emergency Procedures?

In today's workplaces there are many emergencies other than fire to prepare for. Consider what might happen in your workplace - chemical spill, explosion, rupture of gas, water or fuel lines, medical emergency, flood, bomb threat, violence, power failure, computer failure; these are some possibilities.

Evacuation is a primary component of most emergency plans. Start with a floor plan and note the location of the primary hazards. Plan exit routes from all parts of the workplace. Add alternates if any of these could be blocked. Try to have the exit routes away from the major hazards. Make a list of possible emergencies in your workplace.

Consider the implications of each situation:

- Will your exits still work?
- Do you have emergency lighting, exit signs?
- Will you need any special procedures to evacuate?
- Will you lose phone contact?
- What will you need for help? Firefighters? Police? Medical personnel, rescue?
- Who will get help?

Develop an evacuation plan and ensure everyone is aware of it. Most importantly, practice.

Emergency preparedness can be a complex undertaking depending on the hazards in your workplace. Canadian Standards Association (CSA) has standards. Canadian Centre for Occupational Health and Safety (CCOHS) has checklists and recommended practices. See the resource list in this document for more complete plans or contact the Workers Compensation Board's Occupational Health and Safety Division at 902-368-5697 or toll free at 1-800-237-5049.

Step 7: Establish Training and Orientation Requirements

Training and Orientation

Teaching how to do the work properly

*23.(3) An occupational health and safety program shall include
(a) provision for training and supervision of workers in matters necessary to their health and safety and the health and safety of other persons at the workplace;*

Safe work procedures are an excellent tool as long as they are actually put to use and not ignored. All workers must be familiar with the procedures so they can do their jobs as safely as possible. Doing their jobs safely starts with workers being trained and oriented, an important component of the OHS program. A program that includes a consistent training and orientation of workers is one that will help everyone in the workplace take their OHS responsibilities seriously and help reduce injuries.

Training involves hands-on, job-specific instruction provided individually or in small groups to workers. It often includes demonstrations and active participation by workers so that supervisors can confirm that workers understand safe work procedures.

Orientation is a process designed to assist new and young workers adapting to a new work environment. A strong safety culture will be communicated to new workers at this stage, and expectations with respect to safe behaviours must be clearly stated. Hands-on training also begins at this stage.

When is Training required?

Training and orientation should take place on a regular basis and at every level of the workplace. Here are some situations where training and orientation are most needed:

- New workers starting on the job
- Seasonal workers or those returning to work after extended absences
- Workers assigned to new job tasks
- Changes made to processes and procedures or to substances, equipment, or tools
- New hazards that are identified through inspections, investigations, and analyses
- New workplace injury trends as they arise.

Every new construction site should have an orientation session to cover issues such as location of hazards, first aid kit and communication equipment.

Training is required in all work procedures that apply to the individual's job as well as all emergency response and reporting procedures. Inadequate performance of procedures is a reason to retrain. Repeated problems with the use of correct work procedures may also be a signal to review how effective the procedures are and the reasons for noncompliance (Eg. Workers are not properly reporting hazards because the procedure is too complicated).

The OHS Program should include the following factors:

- Select the person responsible for each type of training. Communicate this to staff.
- Keep records of all training done, including type, instructor, dates and attendees.
- Allow time for clarification and questions.
- Make demonstration and practice a part of the training.
- If personal protective equipment is to be used, provide training on appropriate use, cleaning, maintenance and fit.

Remember—Supervisors are responsible for ensuring safe work procedures are followed.

Is Specific Training Legislated?

Yes. The Occupational Health and Safety Regulations state that specific training is required in the following areas;

- First Aid
- WHMIS
- Material Safety Data Sheets
- Lock out procedures
- Material handling rules, i.e., how heavy material is lifted and moved
- Maintenance schedules and operations
- Working alone guidelines
- Personal protective equipment: guidelines for use
- Fall protection
- Confined space procedures
- Fork lift operation procedures
- Rescue from confined space or after a fall in fall arrest equipment
- Emergency procedures
- Electrical Hazards
- Safe Hazardous Materials Handling

The Regulations are available online at www.wcb.pe.ca or by calling 902-368-5697 or 1-800-237-5049 in Atlantic Canada.

See **Appendix "E"** for sample Training Record Form

Step 8: Establish Appropriate Levels of Supervision

Supervision

Ensuring Everyone Is Practicing Safe Work Procedures

*23.(3) An occupational health and safety program shall include
(a) provision for training and **supervision** of workers in matters necessary to their health and safety and the health and safety of other persons at the workplace;*

Once safe work procedures are in place, and once requirements for training and orientation are met, there must be adequate supervision of workers. Adequate supervision ensures that workers are actually following the safe work procedures. Due diligence requires consistent enforcement of health and safety standards. Failure to do this can make the supervisor responsible in the event of an injury.

What if a Worker Refuses to Follow Safe Work Procedures?

When a worker is not using safe work practices, the supervisor must reinforce what is expected of the worker. If the worker continues to deviate from recommended practices, he or she should be disciplined accordingly.

A discipline process begins with a discipline policy. The policy needs to be clear, fair, and consistently applied. Making workers familiar with the discipline policy and enforcing it will clearly deliver the message that safety infractions are not acceptable. Infractions can include failure to wear personal protective equipment, failure to follow safe work procedures, or harassment or horseplay at the workplace. Disciplining workers on safety infractions must be followed up by written record to be taken seriously; therefore, keep records on the monitoring of safe work procedures and record use of the discipline policy.

Check the employment standards documentation for suggestions on a progressive discipline policy. It is sometimes helpful to divide health and safety violations into serious and minor categories. In all cases there should be a record kept in the worker's file.

Step 9: Maintain Records and Statistics

Records and Statistics: Evidence that the OHS Program is being used

23.(3) An occupational health and safety program shall include (h) maintenance of records and statistics, including reports of occupational health and health and safety inspections and occupational health and safety investigations, with the provision for making them available to persons entitled to receive them pursuant to this Act and provision for monitoring the implementation and effectiveness of the program.

Written records and statistics can help identify trends for unsafe conditions or work practices so you can take steps to correct these potential hazards. To establish due diligence, records must be kept of all the components of the health and safety program as it is developed and used.

Here is a list of written records you should maintain:

- Inspection reports and records of corrective actions taken
- Incident investigation reports and records of corrective actions taken
- Worker orientation records
- Records of worker and supervisor training showing the date, names of attendees, and topics covered
- Records of meetings and crew talks (toolbox talks) at which safety issues were discussed
- Supervisors' notes and logs of safety contacts
- Records showing use of progressive discipline to enforce safety rules and written safe work procedures
- Joint committee meeting minutes and reports showing steps taken to address health and safety issues
- Subcontractor pre-qualification documents
- Equipment inspection logbooks and maintenance records
- First aid records, medical certificates, and hearing tests

- Forms and checklist (eg. Confined space entry permits) showing requirements for safe work procedures
- Sampling and monitoring records for work around harmful substances (eg. Asbestos, mould)
- Emergency response plan, record of drills, and any resulting improvements

Incident and injury statistics are useful for identifying trends and for measuring the effectiveness of health and safety activities and programs. The table below outlines some ways you might use data from incidents for analysis.

Type of incidents	Types of data	Statistical analysis
<ul style="list-style-type: none"> • Near misses • First aid only • Health care only • Time-loss injury 	<ul style="list-style-type: none"> • Number of incidents • Frequency of incidents • Number of injuries • Types of injuries • Severity of injuries • Number of days lost 	<ul style="list-style-type: none"> • Compare monthly & annual results • Compare type of work or activity • Compare shifts • Compare worker experience and training

Comparing injury rates is one of many indicators used to measure successful programs.

Step 10: Evaluating the Program

Program Evaluation: *Evidence that the OHS Program is effective*

*23.(3) An occupational health and safety program shall include
(i) provisions for monitoring the implementation and effectiveness of the program.*

It is important to know whether your OHS program is actually working. The evaluation process should reveal that the program is achieving its objectives (as stated in your OHS Policy) and is addressing new or emerging safety issues. One way to monitor your program is by tracking and comparing incident and injury statistics. Fewer incidents may indicate that your program is effective.

Monitoring the program's effectiveness is, in part, a role of the Joint Occupational Health & Safety Committee. This is done through regular workplace inspections, identification of hazards, investigating incidents and near misses and concerns from all workers. Ultimately, though, the responsibility for effectiveness lies with supervisors and managers. They are responsible for responding to and following up on all recommendations made by the Committee or Representative as well as any changes that were made as a result of those recommendations.

It is recommended that a procedure be developed to regularly evaluate and revise the program. The procedure should clearly identify responsibilities for monitoring and evaluating the components of the program. Accountability will ensure that the program is kept current and active. Keeping the program current and active involves the following:

- The law requires your program must be evaluated at least every year.
- It is recommended that you assign appropriate people to review the program gradually over the year to make the task easier.
- The JOSH Committee or Representative must be involved in evaluating and revising the program. They are not responsible for the evaluation but rather participate.
- Keep in mind that the program must be accessible to your Committee or Representative, to any worker on his or her request, and at the request of an OHS Officer from the Workers Compensation Board.

Appendix A. Draft Occupational Health And Safety Policy

This policy will apply to _____ at all locations.

(Name of Firm)

P O L I C Y

_____ is committed to providing a healthy and safe work environment for its workers and preventing occupational illness and injury. To express that commitment, we issue the following policy on occupational health and safety.

As the employer, _____ is responsible for the health and safety of its workers.

_____ will make every effort to provide a healthy and safe work environment. We are dedicated to the objective of eliminating the possibility of injury and illness.

As _____, I give you my personal promise to take all reasonable precautions to prevent harm to workers.

Supervisors will be trained and held responsible for ensuring that the workers, under their supervision, follow this policy. They are accountable for ensuring that workers use safe work practices and receive training to protect their health and safety.

Supervisors also have a general responsibility for ensuring the safety of equipment and facility.

_____ through all levels of management, will co-operate with the joint occupational health and safety committee, (if you have one) or the representative and workers to create a healthy and safe work environment. Co-operation should also be extended to others such as contractors, owners, officers, etc.

The workers of _____ will be required to support this organization's health and safety initiative and to co-operate with the occupational health and safety committee or representative and with others exercising authority under the applicable laws.

It is the duty of each worker to report to the supervisor or manager, as soon as possible, any hazardous conditions, injuries, incidents, or illness related to the workplace. Also, workers must protect their health and safety by complying with applicable Acts and Regulations and to follow policies, procedures, rules and instructions as prescribed by _____.

_____ will, where possible, eliminate hazards and, thus, the need for personal protective equipment. If that is not possible, and where there is a requirement, workers will be required to use safety equipment, clothing, devices and materials for personal protection.

_____ recognizes the worker's duty to identify hazards and supports and encourages workers to play an active role in identifying hazards and to offer suggestions or ideas to improve the health and safety program.

Signed: _____ Title: _____

This policy has been developed in co-operation with the Joint Health and Safety Committee, representative or workers.

Appendix B. Sample Workplace Inspection Report Form

Inspection Location	Date and Time:
Names of Inspectors 1 2	3 4
Observations	
Hazard Observed	Priority: Yes / No
Recommended Action	
Action Taken	Date Completed:
Follow Up:	
Copies to:	

Appendix C. Incident/Injury Investigation Report Form

Location of incident: _____ Date: _____

Department: _____

Injury caused: _____

Damage caused: _____

Name of worker: _____ Occupation: _____

Supervisor: _____ Report to OHS? Yes No

Summary of events:

Describe the immediate cause:

Describe the root cause:

Recommendations to control immediate cause:

Recommendations to control root cause:

Follow up:

Signatures of Investigator(s):

Appendix D. Sample Critical Hazard Identification System
Job Task: Movement of Product from Storage to Loading Docks:

Task	Potential Hazards	Preventative Measures:
Drive to Warehouse C	Pedestrian traffic; Obstacles left in path; other lift trucks	Check for pedestrians; clear path before starting truck; and establish right-of-way patterns with other lift drivers
Activate overhead doors	Contact with door not fully open	Stop and wait for doors to open completely.
Drive inside to pallets	Visibility may be limited by going from bright light to darker interior or by mist from freezer doors; May be someone inside door.	Ensure good interior lighting Drive slowly allowing eyes to adjust Honk as going through door
Position lift and slide forks under load.	Forks or truck may hit frames or tubs and dislodge product	Ensure lift is centred, observe for hazards nearby, look up
Lift load	Load may be unstable	Test for balance with forks low; Check load is centred before completing lift
Back into aisle	Visibility may be limited	Use mirrors, back up alarms
Drive forward to doors	Visibility may be restricted by load. Other lifts may be using same aisle. Load may fall	Drive slowly, honk horn at corners, establish right of way with other drivers, ensure walkways are clear and smooth.
Proceed to loading dock	Pedestrians, obstacles in path, other forklifts	As above
Assess material for potential hazards	Contents may be explosive or dangerous if opened, very heavy, or unstable	Check contents for hazards, implement recommended precautions, check weight and stability of load. Take in smaller units if necessary

Job Task: Grading Frozen Raw Product

Steps	Potential Hazard	Preventative Measures
Standing at grading station observing product for sub standard quality	Back/foot pain. Forward bend may cause back strain	Use sit / stand stool. Use railing for foot rest. Take frequent breaks to stretch. Ensure belt is at appropriate height for worker. Use anti-fatigue mats, footrest.
Pick up rejects and put in reject bucket.	Pick up rejects and put in reject bucket. Frequent overreaching may cause shoulder pain. Awkward hand and arm positions may cause strain Pinch grip with gloves may require excessive repetitive force.	Use a guide or rake to bring product closer to worker. Ensure reject buckets are in a convenient location, close to worker. Try different types of gloves. Stretch hands, shoulders, arms frequently. Rotate tasks.

Sample Critical Hazard Identification System
with work procedures

Job Task: Tamping Sand Inside a Building

Steps	Potential Hazard	Preventative Measures
Operating the tamper	Noise	Ensure the power tool's exhaust is equipped with a muffler. Measure noise output of tool to ensure proper selection of hearing protection, or follow manufacturer's recommendations
	Fumes of unburned 2 Stroke Oil or Carbon Monoxide	Ensure proper oil to gas to ratio. Ensure power tool is properly tuned. Ensure adequate ventilation, as recommended by manufacturer
	Dust	Keep area wet to suppress dust, have adequate ventilation to keep dust levels within acceptable means, and/or wear a proper respirator fitted to the user and designed for the dust being generated.
	Eye Injuries	Wear appropriate eye protection.
Operating tamper	Foot Injuries, head injuries	Wear CSA approved footwear. Use head protection where there is a risk of head injury.
	Vibration	Ensure equipment is equipped with an anti-vibration handle and is working properly, the user is wearing anti-vibration gloves. Don't grip the tool too tightly, and rotate workers to ensure exposure is minimized.
	Over-exertion	Let the tool do the job don't try to force it, get help from co-workers when you need to lift tool, use proper lifting techniques.

Work Procedure for Tamping Sand

- Inspect Tamper for potential safety problems as per manufacturer's instructions. (Include these on the procedure)
- Ensure adequate ventilation. Use extraction fans or respirators if necessary.
- Check dust levels, dampen if necessary.
- Wear Personal Protective Equipment: CSA approved boots, hearing protection, eye protection, half face respirator, anti vibration gloves and head protection.
- Start tamper. Work in sections.
- Take breaks and rotate workers every thirty minutes.

Job Task: Use of pressurized water fire extinguisher

Steps	Potential Hazards	Preventive Measures
Remove fire extinguisher from wall bracket	Dropping unit on foot	Support bottom of extinguisher by putting one hand under it Put the other hand on the carry handle and use it to carry the extinguisher
Carry to fire	Muscle injury due to improper carrying Use of the extinguisher on the wrong class of fire Fighting a fire that is too big Smoke inhalation and burns Injury due to lack of rescue capacity.	Lower extinguisher slowly using proper body mechanics. Carry extinguisher by handle below waist Use only to suppress class A fires (ordinary combustibles) Only fight small fires, otherwise GET OUT Stay outside of small rooms and shoot the water stream in. Never fight a fire alone. Get Help.
Remove pin from handle	Dropping extinguisher on foot Discharging extinguisher while removing pin due to pressure on discharge lever.	Set extinguisher down in upright position Hold one hand on top of extinguisher to hold it steady while slowly removing the pin with the other hand Don't put pressure on the discharge lever while removing the pin
Point hose nozzle at the base of the fire and depress discharge lever	Dropping extinguisher during use Smoke inhalation	Keep a firm grip on extinguisher and hold steady while using
Return fire extinguisher to bracket and arrange for servicing.	Dropping unit on foot.	Support bottom of extinguisher by putting one hand under it Put the other hand on the carry handle to lift the extinguisher
Report Use		

Work Procedure for Extinguishing Fire

- Call for help.
- Remove fire extinguisher from wall bracket. Support the extinguisher with one hand on the bottom and one hand on the carry handle under the discharge lever.
- Carry the extinguisher to the fire using the handle and keeping the extinguisher below your waist.
- Assess the fire. Attempt to put it out only if it is small. If you are alone ensure someone is coming to assist. Ensure you are fighting a class A fire, one with ordinary combustibles, not an electrical or chemical fire.
- Never enter a small room to fight a fire. Spray from the door.
- Set the extinguisher down. Steady the extinguisher with one hand and pull the pin with the other.
- Point the hose at the base of the fire and apply the stream of water from the edges in. If the fire spreads leave. If you are in danger from smoke stand further back or leave and get help.
- Ensure the fire is out before leaving. Douse any smoldering surfaces.
- Return the extinguisher to its bracket and arrange for servicing.
- Report use.

Appendix E. Training Records

Course: _____ in house ____ external ____ Cost: _____ # hours: _____

Type of training: _____

Re-certification? _____ Date: _____

Trainer: (firm or individual): _____

Topics covered:

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____

Signature of Participants:

Position:

Resources For More Information

There are many specific health and safety resources on the WEB. Below are some non-profit sources. They will have references to further information as well. The Occupational Health and Safety sites in each province have resources also (CCOHS has links to all these.)

Canadian Council for Occupational Health and Safety (CCOHS)

Phone: 1-800-263-8466

Fax: 906-572-4500

www.ccohs.ca/ohsanswers/

Industrial Accident Prevention Association (IAPA)

www.iapa.on.ca/

Government of Australia

www.safetyline.wa.gov.au/

National Institute for Occupational Safety and Health (NIOSH)

www.cdc.gov/niosh/

Workers Compensation Board of PEI

Phone: 902-368-5697

Training Information: 902-368-5698

www.wcb.pe.ca

Workers Compensation Board of B.C.

<http://www.wcb.bc.ca>

Worksafe bulletins provide health and safety details for different sectors.

Canada's National Occupational Health and Safety website

<http://www.canoshweb.org/en/topics.html>



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