SAFE WORK

S SPOT THE HAZARD
A ASSESS THE RISK
F FIND A SAFER WAY
E EVERYDAY

EVERYONE'S RESPONSIBILITY

Guide for Developing a Workplace Safety and Health program

June 2010

Manitoba

Guide for Developing
a
Workplace Safety and Health Program

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INTRODUCTION

About this guide

A workplace safety and health program is a legislative requirement in workplaces with 20 or more workers. Well-designed programs reduce injuries and occupational illnesses.

This guide will help you to develop an effective safety and health program. Each chapter matches one of the eleven elements required in *The Workplace Safety and Health Act* (the Act).

A note about terms — in this document:

- 'the Act' means *The Workplace Safety and Health Act*
- 'regulations' means regulations under *The Workplace Safety and Health Act*
- 'committee' means a workplace safety and health committee required by the act and regulations
- 'division' means the Workplace Safety and Health Division of Manitoba Labour and Immigration
- 'workers' means all workers at the workplace, including managers and supervisors
- 'workplace' means any building, site, workshop, structure, mine, mobile vehicle or other premises or location, whether indoors or outdoors, where workers or self-employed persons are engaged in work or have worked

Who requires a safety and health program?

Employers must develop a safety and health program when there are 20 or more workers employed at a workplace. The safety and health program must meet the requirements outlined in section 7.4(5) of the act. This guide will help you meet the requirements.

If you have full time and part time workers, average the number of workers present each working day over the past 12 months and use this number as the total number of workers employed.

The director of the Workplace Safety and Health Division may permit an employer to establish one workplace safety and health program for more than one workplace or parts of more than one workplace. The director will take into account:

- nature of work performed at the workplace
- requests by employers, workers or unions representing workers at the workplace
- frequency of injury or illness in the workplace or the industry

Why have a safety and health program?

An effective safety and health program can:

- reduce incidents, injuries and illnesses
- demonstrate the employer's commitment to leadership and to protecting worker safety and health
- show the employer is serious about making safety and health a core value built into all operations throughout the organization
- provide internal and external motivation to continuously improve
- allow you to clearly state who is responsible for what within your organization's safety and health system
- make your organization more effective because:
  - principles of a safety and health program may be applied to production, quality control and other areas
  - more and more organizations require contracted employer(s) or self-employed person(s) to have effective safety and health programs in order to qualify for bids
- dramatically reduce costs for:
  - harm to people and damage to property
  - retraining and replacement
  - lost or delayed production
  - reduced competitiveness
  - increased insurance costs
  - fines and legal costs
  - damage to reputation and resulting lost business
- meet responsibilities under due diligence principles

Before you start…

- The act and regulations set out minimum requirements reflecting accepted industry practices. Safety and health programs need to be workplace-specific. A program developed for one workplace may not meet the needs of another.
- To be effective, a workplace safety and health program needs active support and commitment from senior management to ensure the program is carried out with no exceptions. Doing the job safely must be as important as doing it efficiently and effectively.
- The workplace safety and health program needs worker involvement. It must be developed in consultation with your workplace safety and health committee. More than that, all workers need to be involved in safety and health activities.
- Everyone must be responsible for making the safety and health program succeed. Senior management are responsible for developing and implementing the program, while supervisors and workers are responsible for carrying out specific elements of the program. Safety and health responsibilities must rank as an important part of every job.
- Each of the program's elements must be in writing and supported by appropriate documentation. Cross references must be made to separate policies or procedures considered a part of the main safety and health program document.

- The program must also address the safety and health of contractors, contracted employer(s) or self-employed persons and their workers. At a construction project site with two or more employers, the prime contractor has the role of co-ordinating the workplace and safety programs of those employers/contractors.
- All workers must be made aware of the workplace safety and health program. On request, program information must be available to the workplace safety and health committee, workers or a workplace safety and health officer.
- A safety and health program is a living document that must be adapted, evaluated and enhanced continually to make the workplace safer and healthier. Applying and monitoring the program effectively is crucial to its success.
- In short, to be effective, your program must:
  - be workplace specific
  - have commitment from the employer and senior management
  - have input from the workers
  - assign clear responsibility and accountability
  - have an evaluation mechanism
  - be accessible and promoted effectively

What is internal responsibility for safety and health?

The Workplace Safety and Health Act supports every worker's right to a safe and healthy workplace. Whether a chief executive officer or the newest worker hired, everyone has a personal and shared responsibility for working together co-operatively to prevent workplace injuries and illness.

Because employers have the greatest degree of control over the workplace, they also have the greatest degree of legal responsibility for safety and health. But this does not relieve supervisors and workers from the duty to co-operate in controlling workplace hazards and take necessary precautions to protect themselves and others from hazards.

The act also recognizes that only informed and empowered workers can fulfill their responsibilities effectively. It specifies that workers have the rights to:

- know about workplace hazards, including how to identify them and how to protect themselves from them; and to know and use their rights under the act
- participate in workplace safety and health decisions (ex. through the committee or worker representative) without fear of reprisal
- refuse work believed by the refusing worker to be dangerous

These rights help workers participate on a more even footing with employers and supervisors in preventing workplace injuries and illness.

Taken together, these components are often called the internal responsibility system (IRS) for workplace safety and health. However, good safety and health cannot rely on this alone . Ongoing monitoring and enforcement by the Workplace Safety and Health Division are also required.

The combination of internal monitoring by workplace safety and health committees, and external monitoring and enforcement by the Workplace Safety and Health Division

ensures better legislative compliance and a more effective internal responsibility system in the workplace.

How does due diligence affect safety and health programs?

Sections 4, 5, 6 and 7 of the act set out general due diligence responsibilities. Due diligence means everyone with responsibility for safety and health must "…take every precaution reasonable in the circumstances to avoid a work related injury or illness." This concept of reasonable care holds individuals accountable for what they do and what they fail to do. It goes far beyond simple regulatory compliance.

Due diligence contains these concepts:

- Reasonably practicable – is determined by asking what a reasonable person, in the same position and circumstance, would do to prevent an incident. When making that determination, three main factors need to be taken into account:
  (1) foresight
  (2) prevention
  (3) control
- Degree of risk – the approach selected to carry out a task depends on the degree of risk. The higher the risk, the greater the safety measures that must be taken.

In the case of a workplace safety and health program, the criteria for due diligence requires employers to:

- Establish a program – the program should systematically identify hazards and assess their risks. It must include plans within the program to manage those risks. The plans should reduce the likelihood of the identified hazards causing harm.
- Ensure the program is adequate – the program must meet the needs of the workplace and the workers. It is a good idea to compare your program with industry standards.
- Monitor and evaluate the program's effectiveness – competent staff must be able to regularly check the effectiveness of the program and judge how well it meets legislative requirements.

How should you set up your program to be duly diligent and effective?

The requirements of a safety and health program as outlined in *The Workplace Safety and Health Act* identifies what needs to be in place so that you can meet the elements of due diligence. These requirements include:

1) a policy that demonstrates your commitment

2) adequate systems to identify and control hazards

3) identifying what people, resources and procedures are needed to deal with emergencies

4) preparing a statement of responsibilities for safety and health (who is responsible for what)

5) scheduling regular planned inspections

6) developing plans to control chemical and biological hazards

7) developing procedures to control hazards when dealing with contracted employers and self-employed persons

8) developing training plans for workers and supervisors

9) developing a procedure to investigate incidents, dangerous occurrences and refusals to work

10) developing ways to involve workers in the program

11) evaluating and revising your program regularly

How should you develop your program?

For it to be effective, you must make your workplace safety and health program specific to your workplace. Here are some suggestions:

1. Show commitment
   Workplace safety and health programs cannot succeed without commitment from the employer and all levels of management. This involves:
   - taking leadership in preparing and running the program
   - being involved in all safety and health activities
   - showing leadership in action and words
   - making safety and health part of the organization's culture
   - promoting the attitude that doing a job properly includes doing it safely and that the organization accepts no substitute for safety
   - communicating regularly with workers about safety and health
   - promptly responding to workers' concerns and suggestions
   - co-operating and consulting with the safety and health committee
   - continuously evaluating and improving the program

2. Involve workers
   An effective program needs the experience and knowledge of workers. You must develop the program in consultation with the workplace safety and health committee. Start with a planning meeting. Involve the employer, senior managers and the committee. The meeting should:
   - confirm everyone's commitment to the safety and health program
   - set out how workers will be involved
   - determine who does what
   - decide how workers will be told that a program is being developed
   - ask workers for their input and advice
   - ask workers how the program can be evaluated and improved

3. Hold meetings to tell workers about the program. Provide details at follow-up meetings. Use the organization's e-mail system, newsletter, and other communications systems to keep everyone updated. Tell workers about the:
   - human and financial costs of injuries and illnesses
   - requirements of workplace safety and health legislation
   - commitment of senior management to a safe and healthy workplace
   - importance of everyone's input to the program's development and implementation

4. If you already have a safety and health program in place, take the opportunity to review it with the workplace safety and health committee to see if the program can be improved. An effective safety and health program will not only improve your safety and health efforts, it will contribute to more efficient and effective production and service delivery.

Chapter 1 – Safety and Health Policy

Section 7.4(5) of *The Workplace Safety and Health Act* says that a workplace safety and health program must include a statement of the employer's policy with respect to the protection of the safety and health of workers at the workplace.

This chapter explains what a policy statement is and what should be in it. It also provides examples of policy statements. However, remember that your policy statement is meaningless unless it is implemented.

What is a policy statement?

A workplace safety and health policy is a statement of principles and general guidelines that govern your safety and health actions. It tells workers, suppliers, contracted employers or self-employed people, prime contractors and clients about the organization's commitment to safety and health.

Your safety and health policy should include:

- the safety and health philosophy of the organization
- management's commitment to prevent injuries and occupational illnesses
- the objectives of the safety and health program
- the responsibility of workers and others for safety and health
- a statement that substandard safety and health performance will not be accepted

Your policy statement needs to be written and communicated to all workers. Workers need to understand what your policy says. Many employers post it throughout the workplace and use it as an introduction to the written safety and health program. It must be kept up-to-date, and it must be followed in all work activities. The most senior manager in the organization should sign it.

Principles of safety and health that often appear in policy statements include:

- working in a safe and healthy way is a condition of employment
- safety and health is everyone's responsibility
- everyone is accountable for their safety and health performance
- safety is as important as production, quality and cost control
- all hazards will be identified and controlled
- safety and health education will be consistent and ongoing
- safety and health meetings will be held regularly
- regular workplace inspections will be conducted
- all incidents and near incidents will be reported and investigated

Workplace Safety and Health Policy (Sample 1)

The board of directors is committed to providing a safe and healthy work environment for all workers.

The board recognizes the roles, rights and responsibilities of all workers in the field of workplace safety and health and is committed to ensure that all workers are aware of these and other conditions embodied in provincial legislation.

The board is committed to establish and maintain a workplace safety and health program to ensure the goals of this policy and the right of participation for all workers.

The board is committed to the support of safe work procedures through funding adequate equipment, programs and training, and through establishment of safe work practice standards.

Date: _____ Signed: _____

Workplace Safety and Health Policy (Sample 2)

What is safety and health?

Safety and health is integral to our company's work. It is part of our operations and is there to protect our workers, clients, property, the environment and the public.

Why is safety and health important to the company?

There are many costs to incidents and unsafe work practices. The greatest costs are human costs. By protecting our workers, we are also protecting their friends, families, fellow workers, management, the public and the environment from the far-reaching effects of serious incidents. We are also protecting our ability to continue doing business and employ people.

In addition to protecting lives, our safety and health program contributes to employee morale and pride because our workers participate in identifying safety and health needs, and in developing safe work procedures.

What are the alternatives to safety and health?

Workers and contracted employers or self-employed people who knowingly violate safety and health rules may face disciplinary action, dismissal or legal action. Visitors may also face legal action if they knowingly disobey safety and health rules. In addition, the company may face legal action and fines for violations of regulatory requirements. Those individuals who do not fulfill their safety and health responsibilities will become accountable for any problems their negligence creates, and may be liable under the law.

Who is responsible?

Everyone employed by this company is responsible for maintaining the safety and health program. Managers and supervisors are responsible for identifying safety and health needs, communicating safety and health hazards, investigating hazardous conditions and incidents, providing training, supplying or wearing appropriate personal protective equipment and ensuring all equipment is properly maintained and meets legislated safety and health standards. Their role is supported by input from all workers.

All company workers, and others on company work sites, are responsible for obeying all safety and health rules, following safe work procedures, wearing and using personal protective equipment when required, participating in safety and health training programs and informing supervisors of any unsafe work conditions. Everyone has the right and responsibility to refuse work when unsafe conditions exist.

By fulfilling our safety and health responsibilities, everyone who works for our company will share the benefits of a safe and healthy workplace.

President and Chief Operating Officer: _____
Date: _____

Workplace Safety and Health Policy (Sample 3)

At ABC Company, the safety and health of our workers comes first. Management is committed to doing everything possible to prevent injuries and to maintain a healthy work environment.

To this end:

- The company is committed to maintain a workplace safety and health program to ensure the goals of this policy.
- Every person in the company must integrate good workplace safety and health practices into all daily activities.
- All workers are required to support the workplace safety and health program.
- Managers are responsible for enhancing safety and health consciousness.
- Supervisors must ensure their workers are trained in safe and healthy work procedures to obtain optimal output without incidents and injuries.
- All workers are accountable for applying this program.

_____

CEO Signature and Date

Safety and Health Policy
Do you have what you need?

- Do you have a written safety and health policy?
- Does your policy show your company's commitment to safety and health?
- Did you consult with your safety and health committee when developing your policy?
- Have you communicated your safety and health policy to all workers?

Chapter 2 – Identifying and Controlling Your Hazards

Section 7.4(5)(b) of *The Workplace Safety and Health Act* requires a workplace safety and health program to include an ongoing system for the identification of existing and potential hazards to workers at the workplace and the measures that will be taken to reduce, eliminate or control those hazards, including procedures to follow in an emergency.

This chapter explains some key concepts about identifying, assessing and controlling hazards. It also provides instruction on what should be captured within your program when describing your hazard identification system, and samples of what those systems may look like.

Introduction

One of the most important elements of a workplace safety and health program is an effective system to identify and control hazards. Hazards may cause injuries and illnesses.

The employer may not be able to anticipate and prevent every incident, injury or illness but should still take all reasonable and prudent precautions. Remember that many workplace injuries can be attributed to hazards and risks that people in the workplace have come to consider routine or unimportant.

To have an effective system to identify and control your hazards, your system should follow the SAFE concept:

Spot the hazard

Competent supervisors, in consultation with experienced workers, are good candidates for leading hazard identification, assessment and control. Your system will be more successful if the employer makes a senior manager or supervisor accountable for keeping the system effective.
Workers are a valuable source of information about hazards and risks in the workplace.

Assess the risk

Your system needs to assess the risk of the hazards that are actually hurting workers, and focus your time and resources on those hazards.

Find a safer way

For all the hazards that have been identified, controls must be put into place to eliminate or minimize the risk to workers.

Everyday

The risk management system should not be separate from operational procedures. To ensure accountability, responsibility must be assigned to specific workers.
The workplace safety and health committee also provides input and advice, and audits the system's effectiveness.

Spot the hazard

A hazard is any activity, situation or substance that can hurt someone. Workplace hazards are divided into two broad categories:

- health hazards
- safety hazards

Health hazards

A health hazard is any agent, situation or condition that can cause an occupational illness.

There are five types:

- chemical hazards (ex: battery acid, solvents)
- biological hazards (ex: bacteria, viruses, dusts, moulds)
- physical agents (energy sources) strong enough to harm the body (ex: electric currents, heat, light, noise, radiation)
- risks for musculoskeletal injuries (ergonomic hazards) (ex: forceful exertions, awkward or sustained postures, repetitive work)
- psychosocial hazards (ex: harassment, violence, shift work, workplace stress)

A health hazard may produce serious and immediate effects or it may cause long-term problems. All or part of the body may be affected. Someone with an occupational illness may not recognize the symptoms immediately. For example, noise-induced hearing loss is often difficult for workers to detect until it becomes advanced.

What is a safety hazard?

A safety hazard is anything that could cause physical injury. Injury caused by a safety hazard (such as a cut or fracture) is usually obvious. Some examples of safety hazards include:

- slipping/tripping hazards (ex: electrical cords across floors)
- fire and explosion hazards
- moving parts of machinery, tools and equipment (ex: pinch and nip points)
- work at height (ex: work done on scaffolds or ladders)
- ejection of material (ex: from moulding operations)
- pressure systems (ex: steam boilers and pipes)
- vehicles (ex: forklifts and trucks)
- materials falling from height, rolling, shifting or caving in
- workplace violence

You have a variety of resources at your workplace to help you identify hazards.

Proactive resources include:

- Regulations – regulations will list specific hazards that need to be addressed in your workplace. Usually this is done by prescribing what needs to be in place to protect against those hazards.
- Codes of practice – these will describe industry practices used to protect against common hazards.
- Education – the more education you receive about hazard control, evolving technology and workplace safety and health, the more effective you will be.
- Standards – standards prescribe what measures must be taken to prevent the exposure to hazards (ex: CSA, ANSI)
- Guidelines – guidelines will give you similar information as the codes of practice.
- Material safety data sheets will identify hazards associated with the controlled product you are using.
- Consultation – you will need to consult with workers who work with or near the hazards, experts such as engineers, maintenance people and manufacturers of equipment or materials that you are using.

Reactive resources include:

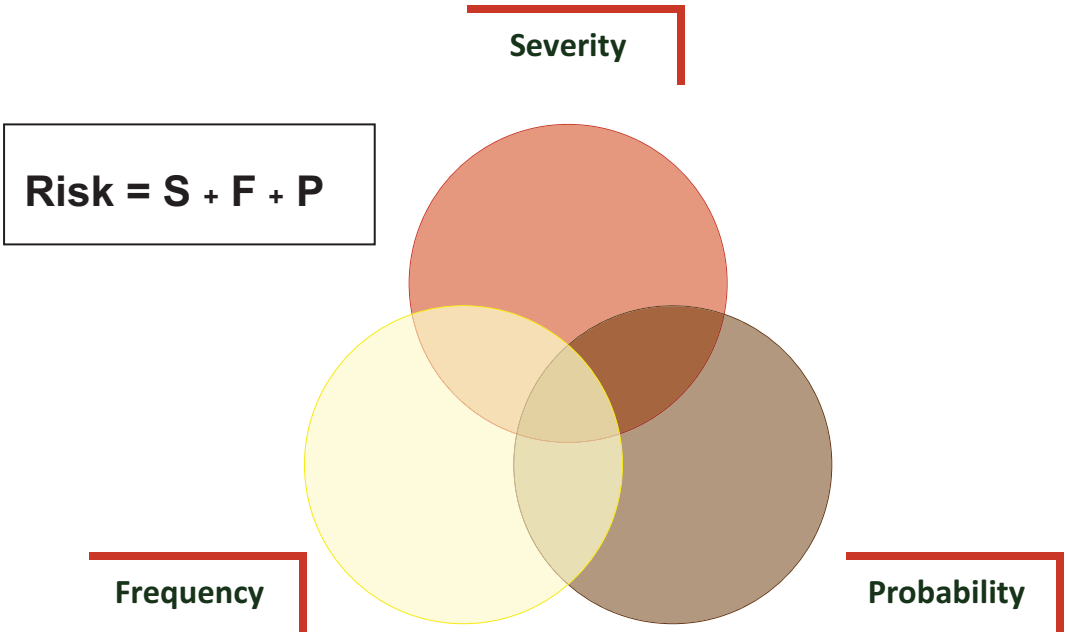
- Incident statistics/trend analysis – reviewing the statistics and incident patterns will help you identify the types of hazards that are causing incidents.
- First aid records – your records will show the injuries requiring first aid treatment. You can then identify the hazards.
- Education – the more education you receive about hazard control, evolving technology and workplace safety and health, the more effective you will be.
- Experience – if you have experienced a hazard, you will be more likely to identify when a hazard is present and share what you know with others.
- Consultation – you will need to consult with workers who are working with or near the hazards, experts such as engineers, maintenance personnel or manufacturers of equipment or materials you are using.

Assess the risk

When you are assessing hazards you have identified, you are trying to determine what your priorities should be. In other words, which risks are greatest.

Risk can be defined as the possibility of adverse consequences. When determining risk, you need to consider:

- severity - how seriously would workers be harmed, or property be damaged or lost if exposed to the hazard
- probability - how likely it is that an injury or illness will result from exposure to the hazard
- frequency – how often a worker is exposed to the hazard.



When you evaluate hazards, consider how serious they are. Safety hazards are sometimes easier to evaluate than health hazards because they are usually more obvious and their effects are often severe. Health hazards can be more difficult to identify and classify. For example, if you are dealing with a controlled product, you may have to do research to determine at what level it is actually a hazard.

Risk assessment methods

You can use many different methods to measure hazard levels. We review a couple of examples in this guide that you can choose to use. You will need to pick a method that works best for your organization.

If you are new at assessing hazards, you will want to choose a method that you understand.

1. The following method puts a number value on different levels of severity, probability and frequency.

Severity		Probability		Frequency	
1	fatality or permanent disability	**1**	likely to occur immediately	**1**	greater than 75 per cent of day
2	lost time injury	**2**	probable in time	**2**	50 per cent – 75 per cent of day
3	reportable injury, no lost time	**3**	possible in time	**3**	25 per cent – 50 per cent of day
4	minor medical treatment	**4**	remotely possible	**4**	less than 25 per cent of day

Once you evaluate the hazards and add up their values, the total corresponds to a hazard priority. Deal with priority one first and then proceed in numerical order.

Total	3 – 4	5 – 6	7 – 8	9 – 10	11 – 12
Hazard Priority	1	2	3	4	5

Let's put it to use:

Example #1
Safety hazard – falling off a six-foot stepladder onto a concrete floor. The likely injury would be a lost time injury. If the worker is working with both hands while on the ladder, the probability of falling would be possible in time. This type of work is done little more than 25 per cent of my day (so exposed to this hazard).

Severity		Probability		Frequency	
1	fatality or permanent total disability	**1**	likely to occur immediately	**1**	greater than 75 per cent of day
2	lost time injury	**2**	probable in time	**2**	50 per cent – 75 per cent of day

3	reportable injury, no lost time	**3**	possible in time	**3**	25 per cent – 50 per cent of day
4	minor medical treatment	**4**	remotely possible	**4**	less than 25 per cent of day

If the risk assessment values are added (severity 2, probability 3 and frequency 3), the total would be 8. Referring to the chart below, a total of 8 gives a hazard priority of 3.

Total	3 – 4	5 – 6	7 – 8	9 – 10	11 – 12
Hazard Priority	1	2	3	4	5

Example #2

Health hazard – using a brake cleaner to remove oil and grease from a metal piece. The likely illness would be eye/throat irritation or dizziness and nausea at higher concentrations, a reportable injury with no lost time. If this product is used without any ventilation and personal protective equipment, it is likely that the worker will be affected over time. The worker uses this brake cleaner (so exposed to the hazard) less than 25 per cent of the day.

Severity		**Probability**		**Frequency**	
1	fatality or permanent total disability	**1**	likely to occur immediately	**1**	> 75 per cent of day
2	lost time injury	**2**	probable in time	**2**	50 per cent – 75 per cent of day
3	reportable injury, no lost time	**3**	possible in time	**3**	25 per cent – 50 per cent of day
4	minor medical treatment	**4**	remotely possible	**4**	< 25 per cent of day

If the risk assessment values are added, (severity 3, probability 2 and frequency 4), the total would be 9. On the chart below, a total of 9 gives a hazard priority of 4.

Total	3 – 4	5 – 6	7 – 8	9 – 10	11 – 12
Hazard Priority	1	2	3	4	5

Find a safer way

Now that you have identified and prioritized hazards, you need to put effective controls in place to reduce risks to workers.

As a first step in hazard control, determine if the hazards can be controlled at their source (where the problem is created) through engineering controls. If this does not work, try to put controls between the source and the worker. The closer a control is to the source of the hazard, the better. If this is not possible, hazards must be controlled at the level of the worker.

One type of hazard control may not be completely effective. A combination of different hazard controls often works well. Try to eliminate the hazard rather than just controlling the symptoms.

How can you control a hazard at the source?

- Elimination – first, try eliminating the hazard. Getting rid of a hazardous job, tool, process, machine or substance may be the best way of protecting workers. For example, a salvage firm might decide to stop buying and cutting up scrapped bulk fuel tanks to avoid the explosion hazard.
- Substitution – if elimination is not practical, try replacing a hazard with something less dangerous. For example, a hazardous chemical can be replaced with a less hazardous one. A safer work practice can be used. Be sure to also identify, assess, and control the hazards of substitutes.
- Redesign – sometimes engineering can be used to redesign the layout of the workplace, workstations, work processes and jobs to prevent ergonomic hazards. For example, containers can be redesigned to make them easier to hold and lift. You may also be able to improve workplace lighting, ventilation, process controls, etc. Computer monitors can be raised to prevent neck strain.
- Isolation – isolating, containing or enclosing them is often used to control chemical hazards and biological hazards. For example, negative-pressure glove boxes are used in sandblasting.
- Automation – dangerous processes can sometimes be automated or mechanized. For example, computer-controlled robots can handle spot welding operations in manufacturing plants. Care must be taken to protect workers from robotic hazards.

How can you control a hazard along the path to the worker?

- Barriers – a hazard can be blocked. For example, proper equipment guarding can protect workers from contacting moving parts. Screens and barriers can block welding flash from reaching workers. Machinery lockout systems can protect maintenance workers from physical agents such as electricity, heat, pressure and radiation.
- Absorption – baffles can block or absorb noise. Local exhaust ventilation can remove toxic gasses, dusts and fumes at the point of origin.
- Dilution – some hazards can be diluted or dissipated. For example, general (dilution) ventilation might dilute the concentration of a hazardous gas with clean, tempered air from the outside. Dilution ventilation is often quite suitable for less toxic products, but

is not effective for substances that are harmful in low concentrations. It may spread a hazard throughout the workplace rather than removing it.

How can you control a hazard at the level of the worker?

Control strategies at the level of the worker are sometimes referred to as administrative controls. These controls usually do not remove the risk. They only reduce the risk to the worker and make severe injuries less likely. Therefore, most safety experts consider control at the level of the worker to be the least effective method of hazard control. No administrative control will be effective unless the employer enforces it.

Administrative controls can include:

- developing policies and safe work procedures
- requiring workers to use personal protective equipment (PPE)
- developing hygiene practices
- job planning:
  - scheduling can reduce the time that workers are exposed to a hazard.
  - workers can be rotated through jobs requiring repetitive tendon and muscle movements to prevent cumulative trauma injuries.
  - noisy processes can be scheduled when few workers are in the workplace.

Every day

Your safety and health program needs to show how you intend to follow the SAFE concept every day. It must explain how you plan to *Spot the Hazard* (identify), *Assess the Risk* and *Find a Safer* Way (control your hazards) in your workplace.

This part of the program must be specific to your workplace so that it can reflect the hazards your workers are actually exposed to, and develop controls that are meaningful and effective.

One of the first things you need to establish is what rules apply to your workplace. To do this you must become familiar with *The Workplace Safety and Health Act* and the regulations that accompany the act.

The next thing to do is determine what methods you will use to help keep your workplace safe. The following are some methods you may want to consider.

Safe Work Procedures

Every workplace needs to develop safe work procedures for the work that is done at the workplace. In this guide, we review a process that you can follow to develop your safe work procedures. It is not expected that all of your safe work procedures be captured within the program, but your program should capture:

- the process you will use to develop your safe work procedures (including consultations with your safety and health committee)
- where your safe work procedures are to be kept
- how workers will be trained in the safe work procedures
- how the safe work procedures will be reviewed and updated when necessary
- how you will ensure workers are following safe work procedures

Critical Job Inventory

The first step in developing safe work procedures is to ask the question:

What jobs are done at our workplace that will need safe work procedures to be developed?

An easy way to do this is to develop an inventory of jobs that have some level of risk involved. We call this a critical job inventory (CJI). To help develop your CJI, you want to consider:

- The specific tasks conducted by occupations – if you have a large workplace, start by identifying departments within your workplace. Identify the different occupations within those departments. List the jobs or tasks that each one of the occupational groups do.
- The equipment used at the workplace - there may be multiple jobs or tasks done with one piece of equipment. Remember to look at setup, calibration, changing blades and operation for examples.
- The statistics you have on file, (incident/injury records, first aid books, etc.) – these will help to guide you to jobs or tasks that you may have overlooked. What were the injured workers doing when they were hurt? Did you capture this job or task in the inventory?
- New jobs, unknown jobs or infrequently performed jobs – when a new job is introduced into your workplace, make sure you evaluate it and add it to your critical job inventory. It is important that this process does not stop. It is ongoing. It is important that jobs or tasks that are infrequently performed or not well known to workers are included and are high on the priority list to develop safe work procedures. It is important that these jobs have a very clear procedure so that, when workers are to perform them, they are familiar with the safe way to do so.
- What is the level of risk associated with the particular jobs? Using some method of risk assessment, what should be our priority?
- Depending on the prioritization of the jobs on your inventory, what will your plan of action be on how you are going to develop procedures for those jobs?

Here is an example of a critical job inventory from a woodworking workplace:

ABC Carpentry
Critical Job Inventory

Date: September 2007 Department: Fabrication Occupation: Band saw Operator

TASKS	POTENTIAL LOSS	Severity	Probability	Frequency	Total*	Critical Rating**
Cutting wood using a band saw	Amputation	1	2	2	5	2
Carrying stock from cart to platform	Back injury	2	2	2	6	2
Placing stock into finished product bin	Back injury	2	2	2	6	2
Changing broken blade on band saw	Cuts	3	3	4	10	4
Moving stock cart	Back injury, foot injury	2	3	4	9	4
Cleaning using compressed air	Air into bloodstream, breathing in dust, dust in eyes	1	3	4	8	3
Cleaning using push broom	Breathing in dust, dust in eyes	3	3	4	10	4

Total	3 – 4	5 – 6	7 – 8	9 – 10	11 – 12
Critical Rating	1	2	3	4	5

Severity		Probability		Frequency	
1	Fatality or permanent disability	**1**	Likely to occur immediately	**1**	greater than 75 per cent of day
2	Lost time injury	**2**	Probable in time	**2**	50 per cent – 75 per cent of day
3	Reportable injury, no lost time	**3**	Possible in time	**3**	25 per cent – 50 per cent of day
4	Minor medical treatment	**4**	Remotely possible	**4**	less than 25 per cent of day

Job Hazard Analysis

Once you have your inventory and a plan of action, the next step is to evaluate the jobs. One way to do this is to perform a job hazard analysis (JHA).

There are three steps to conducting a JHA:
1. Break the job down into its basic steps.
2. Identify the hazards that are present in each of the steps.
3. Recommend controls for all hazards that you have identified.

1. Normally, every task can be broken down into a logical order of steps. This sequence of steps will eventually become the basis of the safe work procedure.

   Identifying every step of the task is essential to the result. Ensure you write down **everything** the worker does. After each step is identified, you can go back and combine things or eliminate unnecessary detail.

   Limit the number of steps that you actually record. If there are too many steps to your job, you may need to look at breaking the job down into two jobs. You generally should not have any more than 15 steps in your job.

   Methods involved in analysis by observation and discussion:
   - Select several good workers who are willing to share their knowledge and experience.
   - Gain co-operation by explaining what is being done and ensuring that it is the work, not the worker, that is being evaluated.
   - Observe the task being done by one of the selected workers and record the initial breakdown.
   - Discuss this breakdown with the worker for accuracy, thus encouraging the worker to share knowledge and experience.
   - Repeat points two to four, above, with other workers, if appropriate. Record the basic steps of the task breakdown.
   - Consult with other groups doing the same or a similar task, if necessary.

2. In each basic job step, what are the health and safety hazards that a person might be exposed to? You also need to take into account the specifics of the job itself. For example:
   - Where are you doing this job? Are there environmental factors that are specific to the location?
   - Who is doing the job? Are the workers physically capable of doing the work?
   - What materials are being used for the job? Do they introduce hazards?

3. For each hazard that has been identified, do you have adequate controls in place to protect the worker? Your three choices are:
   - at the source
   - along the path
   - at the worker level (administrative)

   Remember, you want to try to control the hazards as close to the source of the hazard as you can, and more than one type of control may be needed.

Here is an example of a job hazard analysis from a woodworking workplace:

Company Name: **ABC Carpentry** **Date:** **September 5, 2007**

Job Name: Woodworking Band Saw	**Department:** Fabrication	**Conducted By:** J. Carpenter
Job Steps	**Hazards**	**Corrective Actions**
1. Place material in front of blade on work platform	1.a) Debris on platform b) Accidentally start saw while preparing c) Awkward posture - lifting and twisting (material handling) d) Forceful exertion lifting heavier pieces of wood	1.a) Inspect to ensure clean work platform b) Electrically isolate before starting anything else c) Implement lift/materials handling training d) Cover in lift/materials handling training
2. Turn on saw	2.a) Electrical shock b) Exposed blade c) Noise d) Blade break	2.a) Inspect electrical cord and switch b) Adjust guard to 1/8" above wood to be cut c) Hearing protection d) Inspect blade and wear eye protection
3. Push piece of material through blade	3.a) Knots/nails in wood – kickback b) Amputation or cuts – hands contact with blade c) Sawdust in eyes d) Sawdust inhaled (toxic – hardwoods) e) Awkward postures due to leaning and reaching	3.a) Inspect wood and push through slowly. b) Ensure safe zone is identified and jigs or push sticks are used if hand would leave the safe zone c) Eye protection d) Engage dust collection system and ensure included in monitoring program e) Position body to avoid exposure to awkward and sustained postures (Cover in body posture training)
4. Remove material from platform	4.a) Exposed blade – cuts b) Material fall and strike feet	4.a) Keep hands away from blade, shut off saw, use a push stick to remove pieces close to blade b) Wear safety footwear
5. Shut off saw	(Added to #4 corrective actions – remove step)	
6. Clean off saw	6.a) Sawdust in eyes b) Sawdust inhaled	6.a) Eye protection b) Disposable respirator (N95)

Safe Work Procedures (SWPs) are developed by summarizing the important information you identified while conducting the Job Hazard Analysis (JHA). Although SWPs may look different depending on your company, they must capture some basic information. Some SWPs may be more comprehensive based on the hazards associated with the job. Some SWPs may include sections such as scope, qualifications of operators, or materials required, for example. Other SWPs may be more simplistic. It is very important that any samples, examples, SWPs or JHAs taken from any other source must be reviewed at your workplace to ensure they are accurate for your workplace and job.

Your SWP should follow some basic rules:

- Use positive language (ex: words such as ensure or always instead of don't or never).
- Identify the specific job that the procedure applies to.
- Identify who wrote the SWP and who approved it.
- Identify the original date it was produced and the latest revision date.
- Identify specific hazards you may encounter while performing this job.
- Identify personal protective equipment (PPE) or devices required to perform this job safely.
- Identify any special equipment or controls that are required (ex: emergency stops, lock out procedures).
- Describe the step-by-step procedures to perform the task safely.
- Refer to or describe the steps to follow in an emergency or during an equipment malfunction.
- Refer to guidance documents, standards or legislation that applies to the specific task.

Here is an example of a JHA from a woodworking workplace:

Woodworking Band Saw

This task may only be performed by trained personnel

Facility:	Written By:	Approved By:	Date Created:	Date of Last Revision:
Shop 1	J. Carpenter	J. President	June 10, 2004	September 5, 2007

Hazards Present:	Personal Protective Equipment (PPE) or Devices Required:	Additional Training Requirements:
• exposed blade – cuts, amputation • electrical shock • noise • sawdust in eyes • sawdust inhaled (possible toxic) • MSI – back injury	• eye protection • hearing protection • safety footwear • disposable respirator (N95) • push stick or jig • safeguards • dust collection system	• lift/materials handling training • body posture training

Safe Work Procedure:

1. Don personal protective equipment before beginning the task. Ensure clothing fits appropriately (tight fitting).
2. Ensure saw is unplugged or locked out. Inspect work area to ensure it is clean. Inspect the following for defects: electrical cords and switches, the blade (by opening up the wheel guards), and all safeguards. If defects are identified, refer to supervisor for maintenance before continuing. Inspect dust collection system and ensure it is engaged.
3. Assess the weight and size of the wood. If necessary, obtain assistance. When lifting, use safe lifting techniques as per lift/materials handling training.
4. Inspect wood to ensure no defects or foreign objects in wood. If defects are identified, place in refuse bin and continue with alternate piece.
5. Ensure work area is clear of obstructions to prevent twisting and overreaching. Refer to body posture training.
6. Place wood on platform and measure height of wood. Adjust the guard to 1/8th inch above the height of the stock of wood being cut.
7. Ensure all safeguards are in place and start the saw. Ensure saw blade is running properly.
8. Hold wood firmly and flat on the platform. Feed the wood into the blade with your body positioned to the side of the wood. Ensure that hands are kept within the safe zone identified on the platform. Additional safeguards, such as a jig or push stick, must be used if stock size permits hands to leave the safe zone.
9. Shut off saw. Wait until blade stops. Remove wood from work platform. If wood is near blade, use a push stick to clear the blade.
10. De-energize and lock out machine to clean off. If there is a large amount of sawdust, wear a disposable respirator (N95) while cleaning.

If an emergency situation occurs while conducting this task, or there is an equipment malfunction, engage emergency stop and follow the lock out procedure.
REPORT ANY HAZARDOUS SITUATIONS TO YOUR SUPERVISOR

Guidance Documents/ Standards / Applicable Legislation / Other:	
Guidance Documents: • Operator's Manual **CSA Standards**: • Z432-04 Safeguarding of Machinery **MR 217/06:** • 2.1 Safe Work Procedures • 6.1 Personal Protective Equipment • 8 Musculoskeletal Injuries • 12.3, 12.4 Hearing Protection • 16.4 Machine and Tool Safety • 16.5 Safeguards Required. • 36 Chemical and Biological Substances	***This Safe Work Procedure will be reviewed any time the task, equipment or materials change and at a minimum every three years***

Hazard Reporting Sheets

Another method of identifying and controlling hazards is using hazard reporting sheets. A hazard reporting sheet is a form some companies use that allows workers to write down hazards they identify and forward them to their supervisor. The supervisor will ensure that the hazard is appropriately controlled, or will forward it on if others in the organization need to be involved. Some benefits of hazard reporting sheets are:

- to determine if there are repeat hazards in the workplace
- hazards and controls are documented for due diligence
- workers know they can track a concern they have raised
- safety and health committee can compare the hazards to their inspections results

An example of a hazard reporting sheet:

(Worker to fill out)

Date: _____ Supervisor: _____

Description of Hazard:

_____

_____

Suggested Corrective Action:

_____

_____

Worker Name & Signature: _____

(Supervisor to fill out)

Date: _____

Action Taken:

_____

_____

Supervisor Name & Signature: _____

(Back to worker)

Worker Name & Signature: _____

(Safety and Health Committee) Worker Co-chair: _____ Management Co-chair: _____

Toolbox Talks

Another method of identifying and controlling hazards is to use toolbox talks. Toolbox talks are commonly used in the construction industry. Before the start of a day or shift, the supervisor will hold a quick meeting with the workers to talk about any safety and health issues. Common issues discussed during a toolbox talk include:

- safe work procedures
- special concerns or hazards about an upcoming job or task
- incidents that have happened recently
- emergency procedures
- risks for musculoskeletal injuries
- fire safety

Sample Toolbox Talk Form:

Date: _____Topic: _____Supervisor: _____

In Attendance:

_____
_____
_____
_____
_____

Other Issues Discussed:

_____
_____
_____
_____
_____
_____

Identifying and Controlling Your Hazards

Do you have what you need?

- Do your workers understand the concept of SAFE work?

- What methods are you using **every day** to ensure you are practicing SAFE work? Have you described them?

- Do you have a process for developing and applying your safe work procedures? Have you involved workers in the process?

- Have you captured specific procedures and requirements outlined in *The Workplace Safety and Health Act* and regulations?

Chapter 3 – Dealing with Emergencies

Section 7.4(5)(c) requires identification of internal and external resources, including personnel and equipment, that may be required to respond to an emergency.

This chapter reviews what an emergency is, what emergency response plans are, what they should contain, and how you can keep them effective at your workplace.

Introduction

What is an emergency?

An emergency is usually an incident or disaster causing serious injury or damage, or that has the potential to cause serious injuries or damage.

Emergencies commonly include:
- fires and explosions
- major releases of hazardous material or organisms
- major traffic accidents and train derailments
- natural disasters such as floods and wind storms

What are emergency response plans?

Your workplace must prepare effective emergency response plans and be able to support them if necessary. Effective plans prevent or minimize fatalities, injuries and loss.

Some basic considerations when thinking of your plans:
- Make sure your organization has the necessary people, procedures and resources in place.
- Clearly define who is responsible for what.
- Train everyone to follow procedures and use appropriate equipment. Provide refresher training regularly.

Your plans must:
- Identify situations (fires, explosions, spills, leaks, etc.) that will require response.
- Identify what will be done when an emergency occurs. Response plans usually include procedures and responsibilities for:
  - declaring an emergency
  - evacuating workers
  - obtaining internal emergency resources
  - obtaining help from external organizations
  - initiating emergency rescues
  - tending to casualties

What resources must your emergency response plan identify?

The plan must include procedures and identify resources, including the people and equipment needed to deal with each emergency, such as:

- the location of the place of employment
- existing resources for each potential emergency
- the nature of each emergency that could arise
- outside agencies and emergency responders (fire service, police, ambulance, government, hospitals, etc.)
- special resources required for particular problems that may arise (for example, products needed to fight chemical fires)

How should you prepare your emergency response plans?

Response plans depend on the needs of the organization. Generally, the employer should, in consultation with the committee:

- Make a senior manager accountable for drawing up plans and keeping them current.
- Update plans, equipment and supplies regularly. Have the committee provide input, periodically review the plan and suggest improvements.
- Consider past and potential emergencies (ex: fires, explosions, train derailments).
- Consider the harm each emergency could cause (ex: casualties and damage to the workplace). It is also a good idea to consider what harm to the community and environment each emergency could cause.
- Set up clear responsibilities for managing each emergency. Pay special attention to emergencies that may happen at remote work locations.
- Establish clear responsibilities for communicating from the organization's command centre to workers, the authorities, (fire, police, hospitals, government) and the media. Make sure those in charge will be able to talk to each other during an emergency. Plan how to deal compassionately and effectively with families of workers who may be endangered in an emergency.
- Think about what substances could be released, how and where they could reach workers and how seriously workers could be affected. Use this information to decide what personal protective equipment and supplies are needed and where to make information available to workers.
- Prepare plans for special problems. For example, think about how to handle chemical spills or what special fire fighting techniques are needed for chemical fires.
- Assemble resources for each emergency. For example, make sure you have the proper products readily available to fight chemical fires. Keep products fresh.
- Make sure all workers know what to do in each emergency. Train all workers to carry out their responsibilities competently. If possible, regularly rehearse each emergency response drill to keep skills current.
- Find out what emergency responders serve your area, such as ambulance services, fire and rescue personnel, medical facilities, trauma counselling services and other agencies. Find out how long it will take emergency services to reach your facility.
- Make sure the authorities (fire services, etc.) know what emergencies could occur at your workplace. Tell them about any special techniques and protective equipment that must be used (such as techniques to combat hazardous decomposition products that could be given off during a fire). Tell the medical authorities about any special antidotes or medical aid that casualties may require. Prepare to provide MSDS, etc. to the authorities as required. Keep information current.
- Hold regular practice sessions with emergency response organizations.
- If an emergency occurs, ensure that the workplace is safe before allowing workers to return to work.

Dealing with Emergencies

Do you have what you need?

- Do your workers know what emergencies might arise at work?
- Do your workers know how to respond in an emergency?
- Do you know who is responsible for what if an emergency occurs?
- Have you developed a system for checking your response plans?

Chapter 4 – Responsibilities

Section 7.4(5)(d) of *The Workplace Safety and Health Act* requires your program to include a statement of the responsibilities of the employer, the supervisors and the workers.

This chapter discusses what safety, health responsibilities are common to each workplace, and who is accountable for those responsibilities.

Introduction

Employers, supervisors, and workers are all legally responsible for safety and health in the workplace. Everyone must be individually accountable for carrying out his or her responsibilities. The greater the authority, the greater the responsibility.

Sections 4, 5, 6, and 7, of the act state the general duties of employers, supervisors, and workers. Contractors, contracted employers and self-employed persons, prime contractors, owners and suppliers also have duties for safety and health. Everyone must work together to control hazards and prevent emergencies.

Safety and health should be handled like any other activity. Duties should be assigned accordingly. Safety and health is not an extra part of each job, it is an integral component. Put responsibilities for safety and health into every job description in the organization.

Make senior managers accountable. Make specific managers and supervisors accountable for applying each program element. For example, name whoever is responsible for ordering safety equipment, managing maintenance and supplying the resources required for work to be done safely.

Your statements of responsibilities must:

- assign specific responsibilities in writing
- accompany assignments with a monitoring system to ensure compliance
- state what consequences follow when safety and health responsibilities are not carried out

Have the safety and health committee provide input and assess the effectiveness of the system.

What are responsibility and authority?

Responsibility is accountability for carrying out duties properly. Authority is the right to make decisions and direct the work of others.

Since employers are in control, they have the most authority and responsibility for safety and health. Authority can be delegated, giving subordinates the right to act for the employer. However, the employer remains responsible for what subordinates do or fail to do.

To carry out program responsibilities, everyone must:
- know their responsibilities
- have the authority, resources, time and opportunity to carry them out
- have the required knowledge (education, training and certification)

Once the organization has put these elements in place, safety and health performance should be measured by regular performance reviews.

Responsibilities

What are the responsibilities of employers and senior managers?

Employers and senior managers have responsibilities under *The Workplace Safety and Health Act* that include:
- providing a safe and healthy workplace
- ensuring that legal safety and health requirements are met
- establishing and maintaining an effective safety and health program and obtaining input from the safety and health committee
- allocating enough resources (money, time, equipment and people, including competent managers and supervisors) to implement the program
- making sure that managers and supervisors are trained, supported and held accountable for fulfilling their workplace safety and health requirements
- managing the safety and health performance of their managers and supervisors
- making sure workers have the information, training, certification, supervision and experience to do their jobs safely
- making sure that people not in the employer's service are not exposed to risks to their safety or health arising from, or in connection with, activities in the workplace
- making sure medical/first aid facilities are provided as needed
- setting up effective workplace safety and health committees and ensuring that workers have the means to allow them to participate effectively in safety and health discussions
- co-operating with other parties in dealing with safety and health issues

What are the responsibilities of front line managers and supervisors?

Front line managers and supervisors have responsibilities under the legislation that include:

- taking all precautions necessary to protect the safety and health of workers under their supervision
- ensuring that workers under their supervision use procedures and measures required by the act and regulations
- ensuring that workers use all devices and wear all clothing and personal protective equipment designed or provided by the employer
- advising workers of all known or reasonably foreseeable risk to safety and health in the area where the worker is involved in work
- co-operating with other parties in dealing with safety and health issues

What are the responsibilities of workers?

The responsibilities of workers include:

- understanding and following legislation and workplace safety and health requirements
- following safe work procedures
- using safety equipment, machine guards, safety devices and personal protective equipment
- reporting unsafe acts and workplace hazards
- reporting accidents, near accidents, injuries or illnesses immediately
- working and acting safely and helping others to work and act safely
- co-operating with the workplace safety and health committee and others on safety and health issues

What is the role of the workplace safety and health committee?

The role of the committee must not be confused with the responsibilities of supervisors or employers. The committee brings together workers' in-depth practical knowledge of specific jobs and managers' knowledge of the organization's big picture to provide input and advice on safety and health matters.

The committee should also monitor the workplace safety system (as determined by the safety and health program) to ensure that it is working properly. The committee provides input and advice. The employer remains ultimately accountable for the final decision.

The committee should be used to assess the effectiveness of the workplace safety and health program.

What are the responsibilities of safety co-ordinators?

Some large employers have safety and health co-ordinators to help the employer with safety and health activities. The responsibilities of safety co-ordinators should include:

- helping everyone to carry out their safety and health responsibilities
- co-operating with the workplace safety and health committee and helping it to be effective
- supporting safety and health systems and programs throughout the workplace
- advising managers, supervisors and workers on safety and health matters
- co-ordinating interdepartmental safety and health activities
- collecting and analyzing safety and health information and statistics
- co-ordinating and monitoring safety and health training
- conducting research on special problems
- providing advice about safety and health systems at management meetings

What are the responsibilities of owners?

An owner is defined under *The Workplace Safety and Health Act* as:

(a) a trustee, receiver, mortgagee in possession, tenant, lessee or occupier of any lands or premises; and
(b) a person who acts as an agent or delegate of a person mentioned in (a) above,

but does not include a person who occupies premises used as a private residence, unless that person carries on a business, profession or trade at their residence.

Owners' responsibilities under *The Workplace Safety and Health Act* include:

- providing a workplace that does not endanger the safety and health of anyone working in, on or near the workplace
- knowing and following safety and health requirements

What are the responsibilities of contractors?

Your workplace safety and health program must have a system to deal with the safety and health risks associated with the work of contracted employers or self-employed persons which includes:

- establishing safety and health criteria for evaluating and selecting contracted employers or self-employed persons
- establishing a system of information exchange with contracted employers and self-employed persons
- clarifying who is responsible for what to control safety and health hazards associated with the contracted job
- ensuring that relevant safety and health requirements of the organization are applied to contracted employers or self-employed persons
- taking reasonable and practical steps to control health and safety hazards
- monitoring contracted employers or self-employed persons to ensure that safety and health requirements are met
- designating a prime contractor if a construction project is being undertaken that involves more than one employer or self-employed person

What are the responsibilities of contracted employers and self-employed persons?

Contracted employers and self-employed persons have duties under the legislation that include:

- co-operating with the contractor, prime contractor, other contracted employers, self-employed people and workplace safety and health committees in protecting the safety and health of everyone in the workplace
- accepting the responsibility they share with all workers for the safety and health of people affected by their activities in the workplace
- conducting their work in a way that does not endanger anyone's safety and health
- providing information that could affect the safety and health of others at the workplace
- knowing and following applicable parts of the contractor's safety and health program
- knowing and following the legislation

What are the responsibilities of prime contractors?

A prime contractor is required on a construction project that involves more than one employer or self-employed person. The prime contractor is legally responsible for:

- setting up an effective system to ensure everyone involved in work on the project meets their legal safety and health obligations
- co-ordinating, organizing and monitoring work on the project to ensure reasonable and practical precautions are in place to effectively control safety and health hazards
- co-ordinating the safety and health programs of contracted employer

What are the responsibilities of suppliers?

Suppliers have responsibilities under the legislation that include:

- supplying products that are safe when used according to instructions
- providing instructions for the safe assembly, use, and disassembly of products they supply (sell, rent, or lease)
- making sure that the products they supply comply with legislation

Responsibilities

Do you have what you need?

- Do you have specific responsibilities outlined for all workplace parties?
- Does everyone know what their responsibilities are?
- How are workplace parties held responsible for fulfilling their responsibilities?

Chapter 5 – Schedule of Inspections

Section 7.4(5)(e) of *The Workplace Safety and Health Act* requires your safety and health program to include a schedule for the regular inspection of the workplace and of work processes and procedures at the workplace.

This chapter reviews what inspections are all about, the benefits of conducting inspections, and the different types of inspections you may need to do at your workplace.

Introduction

Inspections are one of the most common and effective tools for identifying and correcting problems before they cause injuries and illnesses. Inspections should also be used to draw attention to and encourage good safety and health practices.

Inspections are not only required in those workplaces that need a safety and health program, but the requirement for planned inspections can also be found in the Workplace Safety and Health Regulation 217/2006, under Part 2.

Part 2.4 states that an employer or prime contractor must:

- ensure that regular inspections of the workplace and of work processes and procedures at the workplace are conducted to identify any risk to the safety or health of any person at the workplace
- take immediate steps to protect the safety and health of any person who may be at risk and correct any unsafe condition as soon as is reasonably practical

There are two types of inspections:

- informal inspections
- formal or planned inspections

Informal Inspections

These are, in reality, the conscious awareness of safety and health hazards as people do their jobs. Informal inspections are an important part of an effective system of hazard identification and control that should be done by workers, supervisors and managers.

Since workers are often the first to see things happen, they should be required and encouraged to report hazards. Two important steps for encouraging this are taking concerns seriously and keeping workers informed about the status of remedial action (when and how the correction will be made, or why the corrective action has been delayed or denied).

Formal or Planned Inspections

A formal inspection is a planned walk through or examination of a workplace, selected work area or particular hazards, machinery, tools, equipment and work practices. Formal inspections must include an inspection of work processes and procedures to ensure the adequacy of safe work procedures.

In any workplace, day to day activities create safety and health hazards. People, equipment, materials, and the environment constantly change. Some environmental changes remove hazards, while other changes create new hazards. Inspections help focus attention on change and help solve problems before they cause injuries or illnesses.

Formal or planned inspections help to:

- identify potential problems before they cause injuries or illnesses
- identify equipment problems resulting from such things as wear and tear or improper use
- identify improper work practices
- draw attention to good safety and health practices
- identify new hazards resulting from changes in the workplace
- identify inadequacies in corrective action that has been taken

In your safety and health program, you must describe your inspection schedule at the workplace. Your inspection schedule must identify:

- what will be inspected, (work areas, equipment, tools, procedures, practices, etc),
- who will be conducting the inspections
- how often inspections will be conducted
- what inspection records will be kept
- what training those who carry out inspections require

What types of inspections should be done?

1. Checks of equipment before use or after repair – these inspections should be done by workers and supervisors. They include inspections of tools, equipment, machinery and personal protective equipment.

2. Regular preventive maintenance inspections – these inspections help prevent equipment and machinery failure through early detection of problems and by setting priorities for servicing, adjustment, repair and replacement.

3. Hazard inspections of critical parts and materials – these are regular inspections focusing on parts of equipment and machinery, materials, structures, or worker areas that are more likely than others to cause incidents when they become worn out, damaged, or are improperly used.

4. Housekeeping inspections – good housekeeping prevents many incidents. Housekeeping inspections should be done frequently by workers, maintenance personnel, and supervisors. They should focus on both the cleanliness and orderliness of the work area.

5. Planned general inspections of the workplace – this inspection is a planned walk through of the entire workplace. It is a comprehensive examination of the workplace intended to draw attention to good safety and health practices, and to identify potential problems before incidents happen. These inspections may be done monthly or quarterly. However, if there is a higher level of risk, or the workplace is changing rapidly, they should be done more frequently.

6. Senior management inspections – these inspections help reinforce the importance of good safety and health practices, and keep senior management in touch with safety and health issues in the workplace. They are not comprehensive inspections; instead they are tours of work areas specifically designed to focus on particular safety and health issues.

7. Regular workplace safety and health committee inspections – these should complement inspections done by managers, supervisors and workers. It is a good idea for a committee to conduct an inspection before each regular meeting. Committee inspections can focus on the general physical conditions of the workplace, thereby auditing the effectiveness of the inspection schedule or other elements of the workplace safety and health program.

Workplace safety and health committees can support the safety and health activities of supervisors and workers by finding defects supervisors and workers have become used to. In some cases, committee inspections may also focus on special problems in the workplace.

When a workplace safety and health committee brings a problem or concern to the attention of an employer, the employer is required to resolve the problem or address the concern. If that cannot be done, the employer is required to give the committee a written reason within 30 days for not resolving the problem or addressing the concern.

What should be inspected?

Identify exactly what must be looked at during each type of inspection. Supervisors and workers usually know what should be inspected in their work areas. Other information can be obtained from equipment vendors, maintenance records, industry publications, standards, internal reports, etc. You may also involve the workplace safety and health committee in preparing inspection schedules.

Pay attention to activities known to be associated with incidents and illnesses, such as:

- rarely performed, non-routine and unusual work (ex: workers being asked to shovel snow off the roof).
- non-production activities, such as housekeeping, maintenance, equipment set-up and lab work (ex: a janitor mixes incompatible chemicals and is sickened by the fumes caused by the chemical reaction).
- sources of high energy such as electricity, steam, compressed gas, flammable liquids and explosive substances (ex: someone accidentally turns on a steam pipe being repaired).
- situations that may involve slipping, tripping or falling hazards, or overhead hazards (ex: falling objects).
- lifting situations posing a risk of back and muscle injuries (ex: lifting boxes of produce in the kitchen).
- repetitive motion situations (ex: work involving computers or repetitive, constant uninterrupted motions).
- work involving contact with toxic or infectious substances.

Who is responsible for what within the inspection schedule?

Workers, operators, supervisors, maintenance personnel, safety professionals, and others can carry out inspections. Responsibility for each type of inspection should fall on those who are most knowledgeable, and for whom it is most practical to do the inspections.

Your workplace safety and health program should assign responsibility for carrying out different types of inspections and set out the frequency and scope of those inspections.

Your program must identify what is to be inspected and who will do each inspection. Make sure all who are given inspection responsibility gets the training needed to fulfill their responsibilities.

When should inspections be carried out?

Scheduled inspections of buildings, work areas (including storage rooms and travel ways), machinery, tools, equipment, production processes and work procedures need to be done often enough to find problems before they cause injuries and occupational diseases.

Some kinds of inspections need to be more frequent. For example, equipment might be inspected when issued, before use, when serviced, daily, weekly, monthly, quarterly or annually.

When deciding frequency, consider:

- recommendations of equipment manufacturers
- industry and regulatory standards
- incidents investigation and first aid reports
- hazards at the place of employment
- hazardous work processes and areas
- work procedures

What checklists and reporting procedures should be used?

Checklists can help make inspections thorough. Checklists can be used to help guide you or ensure you look at specific things while performing your inspection. You have to make sure that the checklist you develop is specific to your workplace and work processes so that it is relevant to the inspector.

Checklists can sometimes lead to improper inspections. Inspectors who are rushed may check things off without fully inspecting them. If there is no opportunity to write down extra comments, an inspector may not be able to record important information.

A good checklist or recording form will help to guide the inspector so that the inspection captures hazards that are common or items that are required to be inspected, but will

also allow the inspector to make detailed notes and comments. A good idea is to create a form that looks at behaviour as well as defects.

Provide a place on your inspection recording and reporting forms to classify hazards and identify recommendations for corrective action. Keep file copies of inspection reports and checklists. The inspector will need them to track corrective action and review the history of specific concerns.

Examples of items that may be included in a planned inspection checklist:

- environment – dust, gases, noise, temperature, ventilation, lighting
- floors – slipping and tripping hazards, cluttered aisles
- building – windows, doors, floors, stairs, roofs, walls, elevators, fire exits, docks, ramps
- containers – scrap bins, disposal receptacles, barrels, carboys, gas cylinders, solvent cans
- electrical – switches, cables, outlets, grounding, extension cables, ground fault circuits
- fire protection – fire extinguisher, hoses, hydrants, sprinkler systems
- hand tools – wrenches, screwdrivers, power tools, hydraulic tools, explosive actuated tools, pressurized tools
- hazardous materials – flammables, explosives, acids, corrosives, toxic chemicals
- materials handling – conveyors, cranes, hoists, hoppers, manual lifting, forklifts
- PPE – hard hats, safety glasses, respirators, gas masks, gloves, harness, lifeline
- pressurized equipment – boilers, vats, tanks, piping, hoses, couplings, valves, cylinders
- production equipment – mills, cutters, drills, presses, lathes, saws
- support equipment – ladders, scaffolds, platforms, catwalks, staging, aerial lifts
- powered equipment – engines, electrical motors, compressor equipment
- storage facilities – racks, bins, shelves, cabinets, closets, yards, floors, lockers, store rooms, mechanical rooms, flammable substances cabinets
- walkways and roads – aisles, ramps, docks, vehicle ways, catwalks, tunnels
- protective guards – gear covers, pulleys, belt screens, workstations, guards, railings, drives, chains
- devices – valves, emergency devices, warning system limit switches, mirrors, sirens, signs, cover-plates, lighting systems, interlocks, local exhaust systems
- controls – start-up switches, steering mechanisms, speed controls, manipulating controls
- lifting devices – handles, eye-bolts, lifting lugs, hooks, chains, ropes, slings
- hygiene and first aid – drinking fountains, washrooms, safety showers, eyewash, toilets, fountains, first aid supplies
- offices – work stations, chairs, computer equipment, ventilation, floors, stairs, equipment, emergency equipment, storage cupboards

Sample work site safety inspection

ABC Company

Date: _____ Location: _____

Inspected by: _____

Items to watch for:

- buildings and structures, windows, floors, doors, stairs
- elevators, escalators, man-lifts
- aisles, work surfaces
- lighting
- electrical wiring, cords
- exits, alarms, emergency lighting, drills
- fire protection equipment
- heating and cooling
- sanitation
- storage facilities, areas
- bulletin board
- atmospheric condition, ventilation
- toxic material storage, labels
- flammable liquid, gas, labels, storage containers
- pressure vessel, inspection
- materials handling equipment
- containers
- production equipment, guarding controls
- hand and power tools
- ladders, scaffolds
- vehicles
- first aid, contents, training
- personal protective equipment
- operator authorization
- warning signs, labels
- safe work practices
- proper lifting
- housekeeping
- maintenance
- safety training
- smoking
- locker and lunch room
- job procedures

Item#	Unsafe Act/Condition	Corrective Action By	Completed By

What training is required?

The training needed by people who are conducting inspections depends on the workplace and the types of inspections people are expected to do. The following topics should be covered:

- the purpose of inspections – what inspections accomplish
- inspection planning – where, when, what, who and how
- finding hazards – hazard recognition techniques, including how to find not so obvious hazards, such as chemical contamination, or other work environment hazards
- inspection procedures – how to find hazardous conditions and practices without finding fault or attaching blame
- what standards must be met – what is acceptable and what is unacceptable
- reporting procedures – how to record defects and follow-up
- hazard priority systems and processes – how to categorize and prioritize hazards and find root causes
- hazard control – how to categorize, select, develop, and implement hazard controls, or recommend corrective action
- follow-up – how to ensure corrective action works
- communications techniques – how to communicate with workers and supervisors about inspections and the progress of corrective action

How can defects be corrected?

During inspections, observe workplace conditions and work procedures. If you notice a hazard that could hurt someone, take action right away.

Use the principles of hazard control to identify possible solutions, develop controls and apply corrective action. The employer is responsible for seeing that hazards are corrected. Supervisors and workers are often in the best position to carry out corrective action.

Inspections Schedule

Do you have what you need?

- Does your workplace promote informal inspections?
- Do you know what inspections you need to conduct, who is going to be doing them and what training the inspectors need?
- Have you described your inspection schedule?
- Do you know what records you are keeping?

Chapter 6 – Control Chemical and Biological Hazards

Section 7.4(5)(f) of *The Workplace Safety and Health Act* requires your workplace safety and health program to include a plan for the control of any biological or chemical substance used, produced, stored or disposed of at the workplace.

This chapter reviews what you will need to consider in developing your plans for controlling the chemical and biological hazards in your workplace. It also reviews some of the more common elements of those plans.

Introduction

Most workplaces have some chemical hazards and biological hazards. To control them, you must have a clear idea of what they are, how they act and where they are in the workplace.

Your plan to control chemical and biological substances must meet the requirements of Manitoba Regulation 217/2006:

- Part 35, Workplace Hazardous Materials Information System (WHMIS),
- Part 36, Chemical and Biological Substances.

For detailed information, read the Workplace Safety and Health Division's publication: *WHMIS Guideline*

What are chemical and biological hazards?

Chemical and biological hazards are chemicals, micro-organisms or products of living organisms that cause occupational illnesses.

Chemical hazards

Chemicals are ingredients in trade name products such as paints, adhesives, photographic developers and cleaners used in the workplace. Chemicals exist in one of three states: solid, liquid or gas. They can also be present in:

- dust (fine particles that have become airborne)
- fumes (airborne solids given off during melting)
- mist (splashes or sprays)
- smoke (substances given off during burning)
- vapours (chemicals combined with air during evaporation)

Besides causing illness, chemical hazards can impair judgment, reduce reaction time and increase the risk of accidents. Read product labels carefully. Know the hazards.

Biological hazards

Biological hazards are living things, or substances produced by living things, that can cause illness or disease. Examples include:

- micro-organisms (such as bacteria and viruses)
- fungi (simple plants that feed on dead plant or animal tissue)
- parasites (these live in the bodies of plants or animals)
- plants (some plants contain substances that are poisonous or that cause allergic reactions)

Workers in food processing, sewage disposal, laboratories, agriculture, and other industries handle potentially hazardous biological substances. Examples of possible biological hazards include animal tissues, plant materials and micro-organisms.

Biological substances include products or extracts of plants, animals and micro-organisms. Some can be ingredients in workplace products. For example, bacterial enzymes are in some industrial detergents.

What about indirect exposures?

Sometimes workers don't use, produce or handle chemical and biological substances directly, but they may be exposed to them when the substances are released into the workplace. For example, hazardous products can be given off during welding, sawing, grinding, drilling and many other industrial operations.

Health care workers, emergency response workers, animal handlers and others may be exposed to infectious biological substances when dealing with infectious people or animals.

Hazardous substances may be released from structural materials such as insulation, new carpeting and furniture. Bacteria and fungi may grow on moist furnishings and structural materials. They can also grow in water near ventilation intakes and in ventilation systems.

Micro-organisms, (and in some cases their spores, toxins, and other products) can get into the workplace air. They can settle on food and objects in the workplace and get into workers' bodies.

Workers may also be exposed to stored chemicals or chemicals that have spilled, leaked or accumulated.

What responsibility and accountability is required?

The plan should assign responsibilities to those who order, purchase and receive chemical and biological substances, and these individuals must be held accountable. Those responsible must obtain appropriate hazard information and ensure worker protection and training is adequate. A centralized or structured hazardous product ordering system may help do this.

What additional measures must be taken?

Your plan must also ensure that:

- release of hazardous substances into the work environment is prevented or minimized
- containment and ventilation systems are regularly serviced
- the workplace is cleaned and decontaminated properly
- contaminated workers are decontaminated promptly
- personal protective equipment is inspected, used, cleaned, maintained and stored properly
- spills, leaks, accidents, etc. are investigated properly
- adequate response plans are in place for spills, leaks and other emergencies
- the work environment is effectively inspected for contaminants

What about information for workers?

Information about chemicals and biological hazards must be:

- readily available to workers
- used to set up adequate hazard controls, educate workers and monitor the work environment for contaminants
- kept current

What steps should be taken to prepare plans?

The needs of the workplace determine what must be in your plan. Your plan must protect workers from chemical and biological hazards. Here are some guidelines for drawing up a plan:

1. Identify all chemical and biological substances at the workplace. Decide what substances are hazardous.

2. List hazardous substances. Identify substances covered by WHMIS (controlled products). Next, list any other substances workers are concerned about. Keep the list current. Consult the workplace safety and health committee in preparing and updating the list.

3. Conduct a risk assessment for each hazardous substance. Find out whether the substance can cause harm and how serious the harm could be. Use

information from material safety data sheets (MSDS), suppliers, industry publications, (including any monitoring reports for similar situations), worker concerns, regulatory requirements and information from safety organizations.

4. Reduce or prevent worker exposure and contamination of workers and the workplace whenever reasonable and practical. Whenever possible, use engineering methods to control hazardous substances at the point of production. Use personal protective equipment (PPE) as a last resort.

5. When reasonable and practical, eliminate hazardous substances or replace them with less hazardous ones whenever substitutes are available. Use information from suppliers and your industry to help you decide what to do.

6. Take all practicable steps to prevent workers from being harmed by chemical or biological substances.

7. Re-engineer work procedures, production processes and work flows to make them safer and healthier.

8. Prepare emergency plans. Include them in your safety and health program. Think about what could happen if there is an incident with a hazardous substance. What emergency response plans are required?

What about WHMIS plans?

The WHMIS component of your safety and health program should:

- state who is responsible for obtaining and updating MSDS and product labels required by WHMIS
- use the information to apply safe work procedures
- ensure workers are trained to understand WHMIS requirements and safely handle controlled products they work with
- state how each of these things will be done, who is responsible and what the role of the committee will be

A centralized ordering or receiving system may help ensure that the right information is received. Assign people competent to track the flow of information and make sure it is used properly.

What issues should the WHMIS plan address?

1. how to ensure an acceptable MSDS, complete and less than three years old, arrives with each controlled product (the content of an acceptable MSDS is set out in Schedule 1 of the federal Controlled Products Regulation)

2. how to make relevant MSDS readily available to workers who need them

3. how to ensure that correct WHMIS labels (supplier and workplace) are attached to each container of controlled products

4. how to develop and deliver a training program on:
   - the WHMIS system
   - the hazards of controlled products
   - safe handling requirements, emergency procedures and processes for dealing with fugitive emissions

What about hazardous products partially exempt from WHMIS?

Some hazardous workplace products are exempt from WHMIS requirements for supplier labels and MSDS. Consumer products, explosives, pesticides, drugs, cosmetics and radioactive substances are subject to labelling and disclosure requirements under other federal legislation.

Employers must collect and record the hazards of these substances and determine how to handle them safely. Containers must be clearly labelled. Workers must be told about hazards and trained to handle the materials safely.

The plan must state how information about the hazards of these products will be collected and built into WHMIS training.

What about chemical and biological substances with Occupational Exposure Limits (OEL)?

Occupational Exposure Limits (OEL) are used when an airborne chemical may pose a health hazard to a worker. An OEL is the maximum allowable limit of a worker's exposure to that chemical.

Threshold Limit Values (ACGIH TLV), as the source for setting OEL.

Although there are five types of limit values, the following two are particularly important to your safety and health program:

- Time Weighted Average (TLV-TWA) – This is the limit based on the average concentration for a conventional 8-hour workday and a 40-hour workweek.
- Short-Term Exposure Limit (TLV-STEL) – This is the limit based on up to four exposures above the TLV-TWA, each of which should be no longer than 15 minutes in duration. They should not exceed the ceiling limit. These exposures must be at least 60 minutes apart from each other.

Workers must not be exposed to average airborne concentrations of these substances above the OEL. The employer must take all reasonably practicable steps to ensure that these limits are not exceeded in any area where a worker is usually present.

Airborne concentrations can be lowered by engineering controls, such as ventilation or enclosures. When properly engineered and maintained, these controls usually prevent or minimize release of substances into the work environment.

Sometimes it may not be reasonably practicable to use engineering controls. For example, say a substance is used only once a year during maintenance. If so, the employer would not usually have to install a mechanical exhaust system to keep exposure below the OEL.

The employer could protect the workers in other ways. For example, the employer could provide workers with personal protective equipment and require its use.

What monitoring is needed?

Monitoring (air sampling, review of personal exposure, etc.) measures contaminants in the workplace. Monitoring can help determine the risks faced and the adequacy of hazard controls. The program must have a monitoring plan where:

1. Worker exposures may exceed the OEL.
2. The work environment may not be safe because of:
   - lack of information about workplace contamination
   - fluctuations in concentrations of contaminants
   - variations in how often workers are exposed to contaminants
3. Workers have complained about their health, or may have become ill because of exposures to workplace contaminants, and existing monitoring test results are suspect or unsatisfactory.

What about multiple exposures?

OELs are designed to measure exposure to one chemical at a time. Sometimes workers are exposed to several substances that harm the same body organs in similar ways. The combined harm can cause an additive effect.

Although the concentration of each chemical is lower than each chemical's OEL, the combined effects may be hazardous. In these cases, exposure must be limited to a fraction of each chemical's OEL.

What corrective action is required?

The employer must protect workers from excessive, unusual and prolonged exposures. Protective measures must include action to protect workers from excessive exposure when working extended shifts and when exposed to several chemicals. The employer must develop and use an appropriate work procedure that reduces the risks. The workplace safety and health committee provides input and advice during development of the procedure, which should identify:

- substances involved
- conditions under which workers will be required or permitted to work
- frequency and length of exposure to the substances
- steps the employer will take to ensure no worker's personal exposure exceeds the equivalent of the OEL for each substance involved and multiple exposures

What about designated materials?

Chemicals identified as possible or probable causes of cancer in humans are known as designated materials.

Where workers are required to handle, use, store, produce or dispose of any of these chemicals, the employer must provide engineering controls — such as local ventilation or enclosures — to ensure that exposures are as close to zero as possible. The employer must also implement other measures (such as administrative measures and the use of personal protective equipment).

What about infectious substances?

Section 64 of the Controlled Products Regulations, under the federal Hazardous Products Act, defines infectious materials. The employer should implement a written plan to protect workers who might be exposed to any of them.
Your plan should:

- identify workers who may be exposed
- describe the risks
- describe infection control measures
- state what to do if there are spills or leaks
- state what to do if there are accidental exposures
- state what to do if a worker believes that he or she has been exposed or infected
- state how contaminated material, clothing, work areas, etc must be cleaned or disinfected
- state how to dispose of contaminated material
- describe the training that will be provided to workers
- state how exposures and diseases will be investigated
- state what investigation reports and documents must be kept

Where blood or potentially infectious body fluids are involved, the employer must take prescribed actions to protect workers. Actions include arranging confidential post-exposure counselling, medical evaluation or medical intervention by a qualified person.

Actions and interventions must be acceptable to the province's chief occupational medical officer.

What about pregnant/nursing workers and workers who are hypersensitive or unusually responsive to a substance?

Workers who may be hypersensitive or unusually reactive to a substance, or who are pregnant, may require additional protection. If a substance is present that may harm these workers, and the worker notifies the employer of their condition or their response to the substance, the employer must take steps to minimize the exposure.

What happens if the worker requests alternate work?

The worker may request less hazardous work. If reasonable measures will not minimize exposure, the employer may provide less hazardous work, if available.

Sometimes reasonable measures do not completely protect a hypersensitive worker. Alternative work may not be available. If so, the employer usually is not expected to take further action. Your plan should include a process to address these situations.

Plan for Chemical and Biological Hazards
Do you have what you need?

- Do you have a plan to control your chemical hazards?
- Do you have a plan to control your biological hazards?
- Have you described your WHMIS program?

Chapter 7 – Safeguard Contracted Employers or Self-Employed People at Your Workplace

Section 7.4 (5)(g) of *The Workplace Safety and Health Act* requires a safety and health program to include a statement of the procedures to be followed to protect safety and health in the workplace when another employer or self-employed person is involved in work at the workplace.

The statement should include criteria for evaluating and selecting employers and self-employed people to be involved in work at the workplace, and procedures for monitoring them regularly.

This chapter reviews what you will need to consider making sure that other employers or self-employed people you bring into your workplace are keeping themselves, their workers and your workers safe.

Introduction

When contracted employers or self-employed people come into your workplace, you need to be concerned about new safety and health risks associated with:

- activities of the contracted employers or self-employed people that may create a hazard for your workers or others in the workplace
- hazards in your workplace that affect self-employed people or those working for contracted employers

Contractors

If you contract with an outside company or self-employed person to do certain work and direct their activities, then you are a contractor under *The Workplace Safety and Health Act* of Manitoba.

As a contractor, you are only responsible for managing the safety and health risks that are under your control. This includes having a system in place to make sure contracted employers and self-employed people will properly manage safety and health risks under their control.

You do not need to take over responsibilities like training, supervising or managing safety and health hazards, but you do need to be assured that self-employed people and contracted employers operate according to the law.

A Contractor Safety and Health Plan

Your workplace safety and health program must have a system to deal with the safety and health risks associated with the work of contracted employers or self employed people.

This system should include:

1. Establish safety and health criteria for evaluating and selecting contracted employers or self-employed persons. The criteria should include:

- evidence of good safety and health management (ex: written safety and health program, Workers Compensation Board injury statistics, procedures to address unusual risks associated with the job, etc.)
- requirements to follow relevant safety and health rules and procedures that you have put in place

Like any other requirement of the contract, your safety and health expectations must be made clear to potential bidders in advance. When you make good safety and health performance a requirement of the contract, the selection process becomes quite straightforward. Only bidders who adequately address the requirements of the contract (including the safety and health requirements) should be considered.

2. Establish a system of information exchange in which you provide contracted employers and self-employed persons with information required to do the job safely, and they provide similar information to you and each other.

3. Clarify who is responsible for what to control effectively safety and health hazards associated with the contracted job.

4. Ensure your organization's relevant safety and health requirements are applied to contracted employers or self-employed persons at your workplace.

5. Take reasonable and practical steps to control safety and health hazards that could affect the contracted employer or self-employed person.

6. Monitor contracted employers or self-employed persons to ensure they meet the safety and health requirements of the contract and take appropriate action to correct the problem if they do not. The extent of your monitoring activities will depend upon the nature of the contract and the extent to which you are engaged in directing the activities of contracted employers or self-employed persons. Just as you would periodically check up on performance related to quality, cost control or other aspects of a contract, you will also periodically need to monitor compliance with the safety and health requirements of the contract.

Construction Projects

If you are undertaking a construction project that involves more than one employer or self-employed person, there must be a prime contractor for the project. If you do not contract with someone else to co-ordinate and manage work on the project, you take on the responsibilities of the prime contractor.

The prime contractor is legally responsible for:

- setting up an effective system to ensure everyone involved in work on the project meets their legal safety and health obligations
- co-ordinating, organizing and monitoring work on the project to ensure reasonable and practical precautions are in place to effectively control safety and health hazards
- co-ordinating the safety and health programs of contracted employers

Safeguard Contracted Employers or Self-Employed People at Your Workplace

Do you have what you need?

- Do you have a plan to evaluate and select the contracted employers or self-employed people who are coming into your workplace?

- Do you have a plan to monitor the safety and health performance of the contracted employers or self-employed people who are coming into your workplace?

Chapter 8 – Training Plan

Section 7.4(5)(h) of *The Workplace Safety and Health Act* requires a plan for training workers and supervisors in safe work practices and procedures.

This chapter reviews the elements of a training plan and how to ensure your training is effective. It also reviews who should be included in your training plan.

Introduction

Effective training is an essential part of a workplace safety and health program. Your program will not work unless supervisors and workers know what to do and how to do it.

Put a senior manager or supervisor in charge of your training plan. Work with the workplace safety and health committee to develop the training plan. Have the committee audit its effectiveness.

What is training?

Training means more than providing information. Training is not handing someone a manual and having them sign a piece of paper that says they have read and understood everything. It requires a practical demonstration that each employee has acquired the skill or knowledge related to the job.

What must your training plan accomplish?

Safety and health education and training is critical to making your workplace safety and health program work. While everyone benefits from safety and health training, your training plan must cover the safety and health training needs of workers and supervisors.
The plan must describe:

- how safety and health training will be developed and delivered, and by whom
- how a worker receives an orientation when they start with the organization or when a worker is transferred to a different job, and the content of that initial orientation
- how a worker receives training specific to the work they will be performing, including new equipment, processes or procedures
- what will happen or what are the consequences when there are instances of unacceptable safety and health performance

The objective of your training plan is to help build safety and health precautions into every job and to increase the level of safety and health knowledge and ability to an accepted level. Safety and health training should be built into all work-related training.

Your training plan must:

- assess training needs

- put a mechanism in place to ensure training is delivered
- assign responsibilities for development and delivery of training
- provide a mechanism to monitor the effectiveness of the training and keep training current

What is the role of the workplace safety and health committee?

The duties of the committee include development and promotion of programs for education and information concerning safety and health in the workplace.

The workplace safety and health committee:

- works with the employer on setting up the training plan
- helps the employer promote training
- makes sure co-chairpersons and members are trained in their roles and the functions of the committee
- recommends how training and information should be delivered
- applies the training its members receive to audit the effectiveness of the training plan and other elements of the workplace safety and health program

Who should be trained?

Train everyone with duties under the legislation and your safety program, including:

- workers
- supervisors
- safety and health committee members

Don’t forget your managers. They provide resources to supervisors and set supervisory priorities. They must know their role in the safety and health program too.

When should workers be trained?

Workers should be trained:

- at the commencement of employment
- when reassigned or transferred to a new job
- when new equipment, processes or procedures are introduced
- when performance does not meet safety and health requirements
- when planning must be done for non-routine or irregular tasks

What training should workers receive?

Orientation

Workers should receive a general orientation when they are first hired. Orientations will give workers some basic information on your rules, what is expected of them, and an idea of what your safety and health program contains.

Remember that this may be information overload for new workers, so it is important to provide workers with something they can take away from the orientation to use as a reference when needed.

Some common items covered in orientations include:

- a general review of your safety and health program
- the role of the worker within the workplace safety and health program
- how to raise a safety and health concern
- a review of your safety and health committee, including who their representatives are and how they act as a resource
- safe work practices and procedures – this would include a general review of what they are, where they are and how they are developed. Reviewing specific procedures would be part of the specific job training
- any specific personal protective equipment or other tools required for their job
- fire and other emergency procedures
- the location of first aid facilities including an introduction to first aiders
- rules associated with prohibited or restricted areas, tools and equipment (generally the rule should be that, if you are not trained – it is restricted)
- the general requirements of *The Workplace Safety and Health Act* and regulations, such as worker's rights and responsibilities

Job-Specific Training

Workers must be trained in safe work procedures that have been developed for the specific tasks they will be performing.

The extent of training will depend on the level of risk or detail associated with the task. It is important to consider barriers to training at this point. If you are using written safe work procedures for your training, consider the need to have them translated into other languages or to use pictures for workers who cannot read.

It is important to remember that worker training doesn't end when the initial training ends. Your training plan must ensure workers are trained when they take on new responsibilities and encounter new work or new areas at the workplace.

What training should supervisors receive?

A supervisor is an employee given authority over others. Section 4.1 of *The Workplace Safety and Health Act* sets out the legal duties of supervisors. This includes team leaders, lead hands and workers who are temporary supervisors. The employer remains accountable for what supervisors do and fail to do.

Section 4(2) of *The Workplace Safety and Health Act* sets out general standards for supervisors. Supervisors must have the knowledge, experience or training to ensure that work is performed safely.

Supervisory training should include such topics as:

- applicable sections of the act and regulations applying to the work
- safe handling, use, storage, production and disposal of substances
- how to carry out applicable job procedures and work processes
- the need for, and safe use of, personal protective equipment
- emergency procedures
- their role in supporting the workplace safety and health committee
- coaching and motivation
- any other matters necessary to ensure the safety and health of workers under their supervision

Supervisors are often responsible for training their workers. If this is the case, supervisors should have the necessary training and skill to instruct workers in the safe work procedures that have been developed.

What training should contracted employers and self-employed people, working at your workplace receive?

Train any contracted employer or self-employed person working at your workplace (or take measures to ensure they are trained) in relevant:

- organizational safety and health requirements
- legislation, safety rules and work procedures
- elements of the workplace safety and health program

What training should committee members receive?

Training is crucial to the success of the workplace safety and health committee. Division courses provide basic training for committee members. This training satisfies regulatory requirements for the basic training of committees and representatives. It is not intended to equip committees to deal with specific hazards at the workplace.

Members of a committee are entitled to take educational leave equivalent to two normal working days to attend workplace safety and health training programs, seminars or courses of instruction provided by the Workplace Safety and Health Division or as agreed to by the workplace safety and health committee.

Committee co-chairpersons

Training gives the co-chairpersons the necessary tools for the job. The employer must help the co-chairpersons obtain training in their duties and functions. In turn, the co-chairpersons are expected to attend training programs and apply their learning at work.

Committee members

Leading employers arrange industry specific training. Ideally, all committee members should know:

- how to identify, assess, and control industry-specific hazards
- how to conduct inspections
- how to investigate accidents and dangerous occurrences
- emergency response procedures
- how to assess and review the safety and health program
- Manitoba workplace safety and health legislation
- where to go for safety and health information

Evaluating your training

An important part of your training plan is to ensure that the training you are delivering is effective. It is important to ensure that workers understand the training they receive. When workers do not understand, or when they need more training, they should feel comfortable to ask questions.

To ensure that workers are competent to perform the work in a safe manner, it is important to evaluate those workers. When training is completed, the trainer should evaluate the workers by observing them, questioning them or performing tests, depending on the job. All evaluations should be documented. Your training plan should describe how you intend to evaluate a worker after their training has been completed.

It is also important to evaluate your training program. Talking to new workers is a great way to get feedback on the good parts of your training program as well as areas in which you can improve your training.

Training Plan
Do you have what you need?

- Do you have a new worker orientation plan?
- Do you have a job specific training plan?
- Do you have a training plan for supervisors?
- Do you have a training plan for committee members?
- Do you have a plan to evaluate your training and your training plan?

Chapter 9 – Investigating Incidents and Refusals to Work

Section 7.4(5)(l) of *The Workplace Safety and Health Act* requires a procedure for investigating accidents, dangerous occurrences and refusals to work under section 43 of the act.

This chapter reviews what to have in your procedures to investigate accidents, dangerous occurrences and work refusals. It will discuss what everyone's role should be during the investigations and what to do once the investigations are completed.

Introduction

Dangerous occurrences are often called near misses or near injuries. We will use the term incident to describe both incidents causing injuries as well as dangerous occurrences.

Section 43 of *The Workplace Safety and Health Act* defines refusal to work as "a worker may refuse to work or do particular work at a workplace if he or she believes on reasonable grounds that the work constitutes a danger to his or her safety or health or to the safety or health of another worker or another person."

Proper investigations of work refusals are crucial to resolving the refusal and correcting any circumstances that led to the refusal in the first place.

What should be in your incident investigation procedure?

Investigation procedures for incidents must fit your needs. They should include:

- the objective of your investigations
- what incidents will be investigated
- who will be involved in the investigation process
- when do you need to involve the workplace safety and health division
- what the investigations will involve
- what training investigators and incident responders will receive
- who receives the written investigation reports
- who follows-up on corrective action and ensures it works
- what investigation reports and follow-up records will be kept
- who will be responsible for keeping the documents and records
- what summary and statistics reports are to be developed and how often these reports will be prepared

What should be investigated?

Part 2.9(1) of the *Workplace Safety and Health Regulation* states:
The employer must ensure the following are investigated as soon as reasonably practicable after it occurs:

a) Serious incident
b) An incident or other dangerous occurrence
   i. that injures a person, and results in the person requiring medical treatment, or
   ii. that had the potential to cause a serious incident

This means that the following types of incidents should be investigated at the workplace:

- fatalities or other serious incidents
- injury or illness (whether the person lost time from work or not)
- near misses
- damage to property or process
- right to refuse situations

What is a serious incident?

Part 2.6 of the *Workplace Safety and Health Regulation* defines a serious incident as an incident:

a) in which a worker is killed;
b) in which a worker suffers
   i. an injury resulting from electrical contact,
   ii. unconsciousness as a result of a concussion,
   iii. a fracture of his or her skull, spine, pelvis, arm, leg, hand or foot,
   iv. amputation of an arm, leg, hand, foot, finger or toe,
   v. third degree burns,
   vi. permanent or temporary loss of sight,
   vii. a cut or laceration that requires medical treatment at a hospital,
   viii. asphyxiation or poisoning; or
c) that involves
   i. the collapse or structural failure of a building, structure, crane, hoist, lift, temporary support system or excavation,
   ii. an explosion, fire or flood
   iii. an uncontrolled spill or escape of a hazardous substance, or
   iv. the failure of an atmosphere-supplying respirator.

Part 2.7(1) of the *Workplace Safety and Health Regulation* requires that when a serious incident occurs at a workplace, an employer must immediately and by the fastest means of communication available, notify the division of the incident and provide the following information:

a) the name and address of each person involved in the incident;
b) the name and address of the employer, and if any person involved in the incident is employed by another employer, the name and address of that other employer;
c) the name and address of each person who witnessed the incident;
d) the date, time and location of the incident;

e) the apparent cause of the incident and the circumstances that gave rise to it.

Who should investigate incidents?

Part 2.9(2) of the *Workplace Safety and Health Regulation* is very clear on the issue of committee involvement. The investigation of workplace incidents is a task that is to be carried out jointly by worker and employer. It specifically states that:

An investigation must be carried out by
a) the co-chairpersons of the committee at the workplace or their designates;
b) the employer and the representative at the workplace; or
c) the employer, in the presence of a worker employed at the workplace who is not associated with the management of the workplace, when there is no committee or representative at the workplace.

How can incidents be investigated?

You are not required to use a specific investigation process. You should use a systematic method that fits the needs of your workplace. Your investigation procedure should help find the root cause of each incident. For specific information on how to complete an investigation, you can refer to the Workplace Safety and Health Division's *Guide to Investigating Workplace Incidents*.

What should be in the procedure to investigate refusals to work?

Refusals to work under section 43 of *The Workplace Safety and Health Act* represent a failure of the internal responsibility system. An effective workplace safety and health program should detect and resolve concerns before they cause a refusal.

Your workplace safety and health program requires a procedure to investigate refusals to work under section 43 of the act. Your procedure should state:

- who should be notified about the refusal
- what a supervisor should do when a worker refuses
- how the refusing worker will be informed of rights and responsibilities under section 43 of the act
- who receives the refusal report if the supervisor and refusing worker cannot resolve the issue
- how the committee will investigate the refusal – work refusals are investigated by the supervisor and the worker co-chair or designate
- how a worker asked to do the disputed job will be informed of rights and duties
- who will take corrective action as a result of the investigation
- who will monitor the effectiveness of any corrective action taken

What is dangerous work?

Dangerous work could include:

- danger that is not normal for the job

- danger that would normally stop work
- a situation for which the worker is not properly trained, equipped or experienced

Key Points

- Section 43 applies only to safety and health issues.
- Refusing to work is an individual decision (not a group decision).
- Refusal to work must be based on personal belief.
- Personal belief must be based on reasonable grounds that the disputed work is dangerous.
- To determine if there are reasonable grounds, ask if an average worker — with the same training and experience and using honest, professional judgment — would agree that the disputed work presents an unacceptable risk.
- If the refusal is used for legitimate safety and health reasons, the worker is legally protected from discipline or other sanctions taken by the employer. For more information, see section 42(1) of the act.
- The refusal may continue until either the worker is satisfied the job is no longer dangerous or a workplace safety and health officer has ruled against the refusal. During the refusal, the refusing worker must remain at the workplace unless the employer advises otherwise.

How should a refusal to work be investigated?

1. **Involving the supervisor -** The refusing worker should inform the supervisor that the work is being refused for safety and health reasons. The supervisor should attempt to solve the problem. The refusing worker should not leave the site without the permission of the employer.

2. **Involving the safety and health committee –** If the supervisor and worker cannot resolve the concern, the workplace safety and health committee worker, co-chairperson, or designate, must become involved. The worker co-chairperson, or designate, is to participate in the inspection of the workplace (ex: along with the supervisor and refusing worker, regarding the dangerous condition reported by the worker). The role of the worker co-chairperson, or designate, is to help the worker and supervisor resolve the problem. During the investigation, principles set out in Section 43 of the act must be followed.

3. **Involving the Workplace Safety and Health Division -** Anyone involved in the investigation may contact the Workplace Safety and Health Division for help and advice. However, the committee must try to resolve the matter first.

   If the work refusal cannot be resolved, a safety and health officer will investigate the refusal and will issue a ruling on the refusal. Any ruling or order made by a safety and health officer may be appealed by anyone directly affected by the ruling or order. The officer's decision stands unless an appeal overturns it.

Investigating Incidents and Refusals to Work
Do you have what you need?

- Do you have a procedure for investigating incidents?

- Do you have a procedure for investigating work refusals?

Chapter 10 – Worker Involvement

Section 7.4(5(j) requires a procedure for worker participation in workplace safety and health activities including inspections and the investigation of serious incidents, dangerous occurrences and refusals to work under Section 43 of the act.

This chapter reviews strategies that you can use at your workplace to keep workers involved in safety and health. It also reviews what should be in your program to summarize your safety and health committee.

Introduction

An effective safety and health program needs worker commitment and participation. It must be developed in consultation with your workplace safety and health committee. Most importantly, all employees must be involved in your efforts to prevent injuries and occupational diseases. Workers must be familiar with the program, know their rights and responsibilities, and understand how to handle concerns. Your program should encourage workers to suggest ways to make the workplace safer and healthier.

If workers are going to participate in reporting hazards and suggesting improvements, they must know they will not be subjected to reprisals and that their concerns and suggestions will be taken seriously. The actions of managers and supervisors speak louder than words.

A good worker participation strategy will minimize the risk of an incident or refusal happening in your workplace.

Your program won't work without the support of employees, from senior managers to new workers.

What could your strategy include?

A good worker involvement strategy needs to have clear goals or systems identified. Take this opportunity in your program to summarize the key areas, programs, or systems where you encourage worker involvement. You may want to describe:

- your safety and health committee
- worker rights and responsibilities
- how to deal with or report concerns
- how to suggest improvements in the safety and health program
- participation incentive programs
- company safety communication

Like other strategies within your program, effectiveness depends on the commitment and leadership of the employer, senior management and supervisors.

Your safety and health committee

General Framework

Committees are required for each workplace where there are 20 or more workers. That doesn't mean to say that an employer cannot establish a committee when they have less than 20 workers.

On construction projects where there are 20 or more workers and the project is expected to take more than 90 days to complete the employer also must establish a safety and health committee.

The committee should consist of anywhere from four to 12 members, at least half of which are not associated with management. Committee members should be elected by the workers or in accordance with the constitution of a union where one exists.

There must be two co-chairs, one appointed by the employer (the employer co-chair) and the other chosen by the worker members of the committee (the worker co-chair). The chairs alternate the duties of chairperson at the meetings.

Training

All members of the safety and health committee (employer and worker members) are entitled to the equivalent of two normal working days each year for safety and health related training. This training will help the safety and health committee members fulfill their responsibilities.

Safety and health committee members can take training offered by the Workplace Safety and Health Division, approved by the safety and health committee or as provided in a collective agreement (where applicable).

Rules of Procedure

All safety and health committees must establish written rules of procedure so that everyone is clear as to how the committee will function. Some things that should be summarized in your rules of procedure are:

- when the safety and health committee plans to hold regularly scheduled meetings (day, time and place)
- the procedure to be followed if a regularly scheduled meeting needs to be changed
- rules respecting the conduct of committee meetings
- how you will establish membership and leadership roles in the committee
- clarification of the expectations of committee members
- how the committee will agree upon goals and objectives
- how you will develop group procedures such as:
  - how disagreements will be handled
  - how information will be shared
  - how decisions will be made
  - how priorities will be set.

Other Strategies

Concerns/Suggestions

This process may be covered in another section of your program, but it is a good idea to mention the strategies behind getting people to report hazards or concerns. If you have a concern form, provide an example of that in your program. Anonymous concern forms or suggestion boxes may encourage those who may otherwise not make suggestions.

Concerns or suggestions may not only be about a particular hazard or process, but may also be about the safety and health program itself. Having an avenue for workers to suggest improvements in processes, programming or provide general feedback is a great way to keep workers involved.

Incentive Programs

Incentive programs can be tricky. Some incentive programs reward workers that do not have injuries. These programs can lead to workers not reporting injuries because they want to receive their incentive. These programs are not recommended because employers need to make sure that they are informed of any situation at the workplace that can injure someone – so it can be fixed to prevent injury.

Good incentive programs encourage workers to have a positive effect on workplace safety and health (ex: reporting hazards, wearing personal protective equipment, following safe work procedures).

Company Safety Communication

Some companies have developed creative ways to communicate safety throughout the workplace, including:

- company newsletters with specific safety topics
- safety posters
- safety meetings or a safety portion of a company general meeting

Involving Workers
Do you have what you need?

- Do you have a summary of your safety and health committee?

- Do you have strategies for involving workers in safety and health?

Chapter 11 – Evaluating Your Program

Section 7.4(5)(k) of the act requires a procedure for reviewing and revising the workplace safety and health program at intervals not less than every three years or sooner if circumstances at a workplace change in a way that poses a risk to the safety and health of workers at the workplace.

This chapter reviews what you need to do to check if your safety and health program is working.

Introduction

Like any other program described in this document, your safety and health program needs evaluation to ensure it is working. At the end of each chapter, a checklist captured key points for each of the elements of your safety and health program. When you have completed all of the elements of your safety and health program, you have completed your documentation, but you can't stop there. To have an effective safety and health program, you need to apply and evaluate everything included in your written plan.

Your evaluation plan

You need to develop a plan of action for evaluating your safety and health program. Your plan should include:

- what methods will be used to evaluate
- when each program element will be reviewed and revised
- what the role of the committee will be
- who will take what actions and keep what documents

Methods

You need to come up with a tool to help you evaluate the effectiveness of your program. Some companies have chosen audit tools, some have chosen assessment tools. Whatever the tool is called, it will measure your program and show where improvements are needed. It is important to note that you will need to review documents, conduct inspections and interview workers, supervisors and managers to get all the information needed to evaluate the program fully.

The Workplace Safety and Health Division has developed a safety and health program assessment tool (available on the *Safe Manitoba* website) for use in evaluating your documented program and its implementation.

General questions to consider

Some general question to ask yourself when evaluating your program:

- Is senior management directly involved in the program?
- Does senior management set an example?
- What is the nature and degree of incidents and emergencies that could occur in the organization?
- How does your organization compare with others in your industry?
- Is the work environment clean, well ventilated and adequately lit?
- Is every effort made to purchase tools, equipment and machinery with modern safeguards and hazard controls?
- Can existing tools, equipment, and machinery be retrofitted to include modern hazard controls and safety guarding devices?
- Are tools, equipment and machinery adequately maintained and serviced?
- Are the numbers of workers that supervisors must supervise too high?
- Are written policies, procedures and plans followed and if so, are they working properly?
- Are workers and supervisors involved in setting safety and health objectives and measurements?
- Are safety and health targets and measurements clear, crisp and clearly communicated?
- Does everyone know what is expected?
- Are people rewarded for excellence in safety and health performance as they are for excellence in other areas?
- Is the organization prepared to ensure managers, supervisors and workers carry out their responsibilities?

When do you need to evaluate your program?

At the minimum, your safety and health program must be evaluated and revised every three years. However, evaluations and revisions of your program should occur on an ongoing basis, including:

- when there are changes in the workplace that may affect health or safety (introduction of new technologies, production methods or new hazards)
- when problems have been identified through inspections, concerns, audits and investigations
- when there are better ways of doing the job identified

The entire program does not have to be evaluated at once. You may wish to evaluate your program one element at a time. The objective of the review procedure is to ensure that your program works properly and controls new hazards.

Who will be evaluating?

It is important in your evaluation plan to identify who will be evaluating your program. You can identify one person to be in charge of the evaluation, or you can identify a team of people.

It is important to consider the safety and health committee in the evaluation. At minimum, your safety and health committee needs to be consulted during the evaluation process. A good idea is to use members of the committee to help with specific pieces of the evaluation. This will help to increase worker involvement in your program as well.

Records

After your program is evaluated, you must ensure that someone is responsible for carrying out the recommended actions and that records are kept from the evaluation. The records that you want to keep may include:

- inspection records
- interviews
- documents reviewed
- comments/notes made from the evaluation
- audit or assessment tool that was used

At minimum, these records must be kept for five years. These records are a great thing to review prior to conducting the next evaluation, to identify repeat deficiencies, trends, and to get a good understanding of past issues.

Evaluating Your Program
Do you have what you need?

- Do you have a method for evaluating your program?

- Do you have responsibilities outlined for evaluating your program?

Safety and Health Program Framework

Plan of Action

Sample

ABC Company Safety and Health Policy

At ABC Company, the health and safety of our workers comes first.

Management is committed to doing everything possible to prevent injuries and to maintain a healthy work environment.

To this end:

- The company is committed to maintain a workplace safety and health program to ensure the goals of this policy.
- Every person in the company must integrate good workplace safety and health practices into their daily activities.
- All workers are required to support the workplace safety and health program.
- Managers are responsible for enhancing safety and health consciousness.
- Supervisors must ensure their workers are trained in safe and healthy work procedures to obtain optimal output without accident and injuries.
- All workers are accountable for using the program.

_____

CEO Signature and Date

Identifying and Controlling Hazards

At ABC Company, we know that identifying and controlling our hazards is one of the key components in our plan to keep workers safe and healthy. We are committed to identifying, assessing and controlling our hazards using the SAFE concept: Spot the hazard, Assess the risk, Find a safer way, Everyday. It is important that EVERY worker, supervisor and manager report all hazards they are aware of, so the hazards can be controlled.

Spot the hazard

A hazard is any activity, situation or substance that can hurt someone. Workplace hazards are divided into two broad categories:

- health hazards
- safety hazards

Health hazards

A health hazard is any agent, situation or condition that can cause an occupational illness.

There are five types:

- chemical hazards (ex: battery acid, solvents)
- biological hazards (ex: bacteria, viruses, dust, mould)
- physical agents (energy sources) strong enough to harm the body (ex: electric currents, heat, light, noise, radiation)
- risks for musculoskeletal injuries (ergonomic hazards) (ex: forceful exertions, awkward or sustained postures, repetitive work)
- psychosocial hazards (ex: harassment, violence, shift work, workplace stress)

Safety hazards

A safety hazard is anything that could cause a physical injury. Injury caused by a safety hazard (such as a cut or fracture) is usually obvious.

Assess the risk

We will assess risks identified by considering:

- severity – how seriously a worker may be harmed, or what property may be damaged or lost if exposed to the hazard
- probability – how likely it is that an injury or illness will occur from worker exposure to the hazard
- frequency – how often a worker is exposed to the hazard.

Find a safer way

After assessing the hazards, we will put effective controls in place to reduce the risk to the worker.

We will make every effort to first control the hazard at the source, then,along the path and then at the worker's level. We understand that controls may only reduce the potential for serious injury. No administrative control can be effective unless enforced.

We will look at all possible control choices, such as:

Source:

- elimination
- substitution
- redesign
- isolation
- automation

Path:

- barriers
- absorption
- dilution

Worker:

- developing policies and safe work procedures
- requiring workers to use personal protective equipment (PPE)
- developing hygiene practices
- job planning:
  - scheduling (time) to reduce worker exposure to a hazard
  - rotating workers through jobs requiring repetitive tendon and muscle movements to prevent cumulative trauma injuries
  - performing noisy processes when few workers are in the workplace

Everyday

Our specific plan to identify and control our hazards includes:

1. We will conduct informal inspections of our work areas every day – everyone will be responsible for doing this. We will encourage workers to come up with creative controls for hazards they have identified
2. Managers, supervisors, and safety and health committee members will conduct formal inspections as per our inspection schedule (see Tab E).
3. We will develop safe work procedures for all jobs that have some level of risk to the worker. Our process for developing the safe work procedures will include:
   a. All department managers will be responsible for ensuring that a current critical job inventory is available for their areas. A critical job inventory will be created with input from the workers in the departments to ensure accuracy. A priority list will be created from this inventory and an action plan will be created to ensure safe work procedures are developed for all jobs listed in the critical job inventory.
   b. Following the action plan developed by the department manager, a job hazard analysis will be conducted for each job listed on the critical job inventory. The department manager will ensure a working group is formed comprised of workers and supervisors to conduct the job hazard analysis.
   c. Once a job hazard analysis is completed for a specific job, the working group will summarize the information in a safe work

procedure. The safe work procedures will then be forwarded to the safety and health committee for comment. Once the safety and health committee has provided feedback to the working group, the recommended safe work procedure will be forwarded to the department manager for approval.

d. All members of the working groups will attend specific training on this process to develop safe work procedures.

4. We will provide training to all managers and supervisors on *The Workplace Safety and Health Act* and regulations to help us identify some hazards that are common to our industry and to ensure that any hazards that are identified are controlled in a way that ensures we are following the rules set out by the Workplace Safety and Health Division.

Emergencies

An emergency is usually an incident or disaster causing serious injury or damage, or that had the potential to cause serious injuries or damage.

At ABC Company, we reviewed our work processes and environment and came up with a list of emergency situations our workers may be exposed to:

1. fires
2. floods
3. power outages
4. chemical spills
5. serious incident or injury
6. violent behaviour

For each of these situations, we have developed a specific response plan. Department managers are responsible for ensuring that all supervisors and workers in their departments are aware of the specific plans and have received training on their responsibilities to carry out these plans.

Responsibilities

At ABC Company, all levels of management and workers are legally responsible for safety and health. Everyone must be individually accountable for carrying out his or her responsibilities.

The greater the authority, the greater the responsibility.

Specifically, we have identified responsibilities for all positions within our company:

1. chief executive officer (CEO) responsibilities:
    a. providing a safe and healthy workplace
    b. ensuring that legal safety and health requirements are met
    c. establishing and maintaining an effective safety and health program and obtaining input from all levels of the workforce
    d. allocating enough resources (money, time, equipment and people, including competent managers and supervisors) to apply the program
    e. making sure that department managers are trained, supported and held accountable for fulfilling their workplace safety and health requirements
    f. managing the safety and health performance of department managers
    g. making sure that persons not in the employer's service are not exposed to risks to their safety or health arising from activities in the workplace
    h. setting up effective workplace safety and health committees and ensuring that workers have the means to allow them to participate effectively in safety and health discussions
    i. co-operating with other parties in dealing with safety and health issues
2. Department manager responsibilities:
    a. making sure workers have the information, training, certification, supervision and experience to do their jobs safely
    b. making sure that supervisors are trained, supported and held accountable for fulfilling their workplace safety and health requirements

c. managing the safety and health performance of supervisors

d. knowing and understanding the safety and health program and fulfilling specific responsibilities outlined in the program

e. supporting the Safety and Health Committee

f. co-operating with other parties in dealing with safety and health issues

3. Supervisor responsibilities:

a. taking all precautions necessary to protect the safety and health of workers under their supervision

b. ensuring that workers under their supervision follow safe work procedures and rules set out by the company

c. ensuring that workers use all devices and wear all clothing and personal protective equipment required

d. advising workers of all known or reasonably foreseeable risk to safety and health in the area where the worker is involved in work

e. knowing and understanding the safety and health program and fulfilling specific responsibilities outlined in the program

f. supporting the Safety and Health Committee

g. co-operating with other parties in dealing with safety and health issues

4. Worker responsibilities:

a. understanding and following legislation and workplace safety and health requirements

b. following safe work procedures

c. using safety equipment, machine guards, safety devices and personal protective equipment

d. reporting unsafe acts and workplace hazards

e. reporting accidents, near accidents, injuries or illnesses immediately

f. working and acting safely and helping others to work and act safely

g. co-operating with the workplace safety and health committee and others on safety and health issues

Inspections

Inspections are one of the most common and effective tools for identifying and correcting problems before they cause injuries and illnesses. Inspections should also be used to draw attention to and encourage good safety and health practices.

At ABC Company, we will perform the following inspections:

1. Informal inspections – these are, in reality, the conscious awareness of safety and health hazards as people do their jobs. Informal inspections are an important part of an effective system of hazard identification and control that should be done by workers, supervisors and managers. If a hazard is identified, the worker, supervisor or manager must apply a control immediately. If a control cannot be applied immediately, a hazard control form must be filled out and a copy given to the supervisor of the work area. The supervisor must then be sure to act on the hazard control form.

2. Formal inspections:

    a. Department manager inspections – each department manager is required to perform a safety and health inspection every six months to ensure safety and health hazards are controlled in their departments, and program requirements are met.

    b. Supervisor inspections – each supervisor is required to perform a safety and health inspection weekly to ensure safety and health hazards are being controlled in their departments and that the safety and health program requirements are being met.

    c. Safety and Health Committee inspections – the safety and health committee is required to perform a safety and health inspection each month prior to the safety and health committee meeting. Each worker representative will join with a management representative and perform an inspection of a specific area of the workplace. These inspections will be rotated so that the each team is not inspecting the same area every month.

    d. Maintenance inspections – the maintenance department will conduct preventative maintenance inspections on specified equipment as per maintenance manual.

ABC Company Inspection Form

Date: _____ Location: _____

Inspected by: _____

Items to watch for:

Item#	Unsafe Act/Condition	Corrective Action By	Completed By

- buildings and structures, windows, floors, doors, stairs
- elevators, escalators, man lifts
- aisles, work surfaces
- lighting
- electrical wiring, cords
- exits, alarms, emergency lighting, drills
- fire protection equipment
- heating and cooling
- sanitation
- storage facilities, areas
- bulletin board
- atmospheric condition, ventilation
- vehicles
- toxic material storage, labels
- flammable liquid, gas, labels, storage containers
- pressure vessel, inspection
- materials handling equipment
- containers
- production equipment, guarding controls
- hand and power tools
- ladders, scaffolds
- first aid, contents, training
- personal protective equipment
- operator authorization
- warning signs, labels
- safe work practices
- proper lifting
- housekeeping
- maintenance
- safety training
- smoking
- locker and lunch room
- job procedures

Chemical and Biological Hazards

Our plan to identify and control our chemical and biological hazards is very similar to every other hazard. This includes:

1. We will conduct informal inspections of our work areas every day to address the chemical and biological hazards – everyone will be responsible for doing this. We will encourage workers to come up with creative controls for hazards they have identified

2. Managers, supervisors, and safety and health committee members will conduct formal inspections as per our inspection schedule (see Tab E).

3. Chemical and biological hazards will be addressed when we are developing our safe work procedures.

4. We will provide training to all managers and supervisors on the regulations that deal specifically with chemical and biological hazards.

5. We will identify what chemical or biological hazards may need a monitoring program and develop a specific program to ensure no workers are overexposed.

6. We will maintain a list of controlled products that workers may use or be exposed to and then employ a WHMIS program to ensure workers are trained in how to handle them properly, labels are on all controlled products and MSDS are obtained and up kept when required.

Contracted Employers or Self-employed Persons

At ABC Company, we believe that it is important that anyone coming into our company to perform work has the same belief in the importance of safety and health as we do. We will strive to ensure that other employers and their workers will work in a safe manner and that we will ensure their safety and health while in our workplace.

To assist us in this, we will:

1. Require a demonstration of their safety and health performance prior to them being awarded a tender or contract.
2. Require that they go through an orientation about our safety and health program and any rules or procedures that may affect them while in our workplace.
3. Require that department managers ensure any visitors, including other employers, are monitored while in their department to ensure they are following the required rules or procedures.
4. Require the contracted employers or self employed persons sign a contract related to safety and health performance, and adherence to rules or procedures required.

Training Plan

Our training plan for all employees includes:

- general orientation to safety and health program and company within first few days of employment
- specific hands-on training for work duties which, depending on the job, may include:
  - review of safe work procedures
  - demonstration of work
  - supervised new employee work
  - evaluation of new employee prior to working on own
  - yearly evaluation to ensure competency
  - specific certification where required

Our training plan for supervisors and managers:

- safety and health act and regulation
- any specific responsibilities or duties as outlined in safety and health program
- hazard awareness and control

Our training plan for safety and health committee members:

- any specific responsibilities or duties as outlined in safety and health program
- two days of training per year to be determined by the safety and health committee

Investigations

Incident Investigation

Although at ABC Company we will strive to have zero injuries or illnesses, we understand that the potential is there.

If there is a serious incident, the department manager must immediately contact the Workplace Safety and Health Division emergency line to report the incident. A serious incident is one:

- in which a worker is killed
- in which a worker suffers:
  - injury resulting from electrical contact
  - unconsciousness as a result of a concussion
  - a fracture of the skull, spine, pelvis, arm, leg, hand or foot
  - amputation of an arm, leg, hand, foot, finger or toe
  - third degree burns
  - permanent or temporary loss of sight
  - a cut or laceration that requires medical treatment at a hospital
  - asphyxiation or poisoning
- that involves
  - collapse or structural failure of a building, structure, crane, hoist, lift, temporary support system or excavation
  - an explosion, fire or flood
  - an uncontrolled spill or escape of a hazardous substance
  - the failure of an atmosphere-supplying respirator

When something happens where a worker is injured, or encounters the potential to be injured, the safety and health committee investigation team will investigate. The safety and health committee investigation team will be made up of the management and worker co-chairs or their designates, where that has been decided amongst the safety and health committee.

The investigations will begin as soon as possible after the incident has taken place and will be completed within an appropriate amount of time, depending on the seriousness

of the incident. Once the incident investigation is completed, the investigators will make recommendations that reflect their findings.

The report will then be forwarded to the chief executive officer (CEO), department managers, supervisors and safety and health committee members. The CEO will review the recommendations and inform the investigators within one week of receiving the investigation report if any of the recommendations cannot be implemented. The investigators are then responsible to ensure that the recommendations are carried out.

Right to Refuse Investigations

Workers who identify a hazard must address it with their supervisor immediately. If a danger is urgent, workers should exercise their right to refuse. Should a right to refuse situation exist, the following procedure will take place:

1. Workers inform the supervisor of the situation and together they try to resolve the concern.

2. Where the concern is not resolved, the safety and health committee co-chair becomes involved, helps with the investigation and tries to solve the problem.

3. Where the worker continues refusing to work, the supervisor (or another person involved in the investigation) may call upon the Workplace Safety and Health Division to rule on the right to refuse situation.

Workers must remain at the workplace and accept alternate work. There will be no loss of pay or benefits when a worker accepts alternate work.

Involving Workers

It is very important that workers are involved in safety and health at ABC Company. Workers play an important part in identifying potential hazards and are key to developing and applying controls that will work in operation.

We encourage workers to bring up concerns as well as ways to address those concerns. Workers can fill out the concern report form, which provides room for workers to list the concern or hazard, recommend a control. Once the form has been reviewed, it will go back to the worker for information.

Whether or not workers fill out a concern form, they still have a duty to report any situation to their supervisor for follow up.

Safety and Health Committee

At ABC Company, we have a safety and health committee that helps to ensure our safety and health program is functioning as it should and is a resource to everyone at our company when it comes to safety and health.

Our safety and health committee is made up of six members – three managers and three workers. The worker members represent the operations department, shipping department and office staff. The managers are appointed by the CEO and will reflect the various levels of management within the company.

Worker members are elected every two years prior to the annual safety and health committee meeting held in March. There are also elections for alternate worker members to attend meetings the regular worker member can't attend.

The co-chairs (one management and one worker) are chosen during the annual meeting by the other members of their group.

The safety and health committee meets every month. After the meeting, minutes will be recorded and approved by the co-chairs. After approval, the minutes are sent to all committee members, the CEO and the Workplace Safety and Health Division, as well as being posted on the safety and health committee bulletin board.

The safety and health committee will develop and keep updated rules of procedure for the conduct of the committee. It will also provide an annual training plan for committee members and review the responsibilities and duties of the committee members.

Evaluation

It is important that this safety and health program is a living document that changes whenever the workplace changes.

We will review the content of our safety and health program annually to ensure that all content is current.

In addition, every three years, we will undergo a full safety and health program assessment, which will ensure that the program is in place, in use and effective.

To do this, the safety and health committee will create a team to assess the safety and health program. The team will inspect documentation, the workplace and interview a sampling of workers, managers and supervisors. The team will use the assessment tool provided by the Workplace Safety and Health Division to perform this assessment.

The assessment team will then provide a summary of the assessment and any recommendations that result.

Manitoba

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