Don't Forget To Do This!

It is that time of year again! As we enter 2020, many businesses will take the time to audit their Health and Safety policies and procedures to ensure compliance with OHSA. To help you out, we have created a checklist of things that you are required to have in place or should be doing.

Our commitment to you is to help ensure that your company continues to meet compliance and as such, we have included some points of interest that you may wish to consider.

The following list may not be all-inclusive but more of a snapshot of what the Ministry of Labour, Training and Skills Development (MLTSD) would expect to see should they drop by for a safety audit of your business. We will talk about a more comprehensive assessment toward the end of this document.

1. Ensure that your Health & Safety Policy Statement has been reviewed by the highest signing authority at your company, signed, dated and posted in a conspicuous location.
2. Ensure that your Violence & Harassment Policy Statement has been reviewed by the highest signing authority, signed, dated and posted in a conspicuous location. If your policy statement has not been amended since 2016, it may not meet the requirements of the MLTSD Code of Practice for Harassment. Let us know if you need an updated policy statement.
3. Violence Risk Assessment - Must be done and reviewed as often as is deemed necessary to ensure it still captures the possibility of violence towards your staff. Every business must conduct this risk assessment as it is required by law in section 32.0.3 of the OHSA. This risk assessment must also be shared with your H&S Rep and/or JHSC. If you have not done this, let us know, and we can assist you in conducting a violence risk assessment.
4. Ensure that your monthly safety inspections are posted. It is a good idea to have a schedule posted that states when you are going to do your monthly safety inspections for 12 months.
5. If your company is required to have a JHSC, ensure that the minutes of the last safety meeting are posted. Make sure that the last meeting in no more than three months old.
6. Ensure that the names of your Health & Safety Rep and first aid persons are posted where everyone can see them. Ensure that all the required postings are also posted. There have been changes to some of the postings in the past few years.
7. If your company has a Health & Safety Program in place, which is required under section 25(2)(j) of the OHSA, you are required to review that program annually. In our experience, not all companies are doing these reviews. This is the best time of the year to review your safety program to make sure that it is still working for you and to see if the changes in OHSA would impact your policies and procedures.

a. If you are not sure if your safety program meets current standards, we can take a look and advise you on what you may need to do to bring it up to speed.
b. If you do not have a safety program in place, let us know and we can help you figure out if you even need one (most businesses do). Our new health and safety programs are structured to many of the topics that are outlined in the WSIB's new excellence program.
c. See the below "Did You Know" for some exciting news about safety programs and how employers can save thousands of dollars.

8. This is the time of year that you should take a look at what training you will have to do and plan for it. You can request from us a list of who has been trained at your workplace and when they may need to be updated. It is a good practice to identify what is needed and who requires it at the start of every year. Doing this will allow you a sufficient amount of time to receive budgetary approval. When doing this, don't just plan for the training that you have in your budget, but also the training that you will do in-house. This would include your onboarding of new staff, safety talks, and things that would promote safety during the next year. Some companies may need to budget for the cost of staffing if doing in-house training as well as if special scheduling needs to be considered.
    a. This is also an excellent time to ask yourselves what can you do to build a more positive safety culture with our staff?. Come up with a plan for the year as to how you could improve the safety culture of your workplace.
    b. Will you attend any training yourself to keep up to speed with OHSA? Attending the Partners in Prevention annual Health and Safety Trade show in late April is a great way to keep updated. We will send you free passes to the show once they become available. You will need to schedule the event and decide what training sessions you would like to attend. There are additional charges if you want to attend training while at the show. The show runs from April 28th and 29th in Mississauga.
9. New Employee Safety Orientation is one of the elements that the MLTSD will be asking about during a spot inspection. They are checking to ensure that your workers have taken the MLTSD mandated training elements, but more importantly, what you are doing when new staff are starting with your company? What are you teaching them with regard to the safety hazards that can be found within your business or things a worker may be exposed to?
    a. In the past, we developed your "Employee Health & Safety Orientation program" for your company. If it was developed after 2015, it will for the most part meet the requirements of Regulation 297-Occupational Health and Safety Awareness and Training that the MLTSD uses as a standard for training for new workers. If the manual we developed for you was done prior to 2015, it will be in serious need of an update to ensure it meets the current

standards. A lot of things have changed over the past 5 years. Of all the training that you may need to provide to your workers, the employee health and safety orientation is most likely the most important thing you can do.

b. If you are not sure if your employee safety orientation is meeting current standards, we can do a quick assessment to see what you are doing. There is no cost for this kind of assessment.

10. Check to see that something has been scheduled for things like fire extinguishers, first aid kit, emergency lighting and lifting equipment annual inspections.
11. Lastly, January is always a good time to review any outstanding recommendations that may be awaiting approval. Review the safety meetings, monthly safety inspections, and previous recommendations to see if new goals need to be set for the next year.

Other things that you should consider:

In section 4 of your main Health & Safety Manual, it indicates that your company will do Risk Assessments. Have you done any risk assessments of the high risk jobs that your workers do? One of the most important things a business should be doing is risk assessments for jobs that could see a worker getting injured. One of the best ways of demonstrating a positive due diligence is the assessments of jobs at a workplace. More and more businesses are doing these risk assessments, it is becoming the new "standard of practice". From those risk assessments, safe work instructions should be developed to train workers. Get a free risk assessment form to conduct your own risk assessments or **contact us** to have one of our experienced consultants assist you.

Mandatory Worker and Supervisor Training- the regulation 297 Occupational Health and Safety Awareness and Training came out in 2013. As you know, this is the online training that all workers and supervisors must take. A lot of companies did the training when the law first came out, but we are finding that a lot of businesses have stopped doing this. We are also hearing from our clients that the MLTSD is still asking if business owners are doing this training or verifying that new hires have received it in the past. Check to see if everyone at your workplace has taken this course.

Something we have discovered during interviews with supervisors is that a surprising amount of them have no idea if the company has a health and safety program in place. The company may have policies and procedures in place, but no one is following them because they are not aware of their existence. I had one supervisor tell me that he knows that there are safe work instructions developed for his workers to follow, and he ensures that they have been trained in those, but he admitted that he has never actually read them himself.

It really looks bad on a company and the employer if there is an accident in the workplace, and the company had policies in place to prevent accidents/ incidents, but nobody was following them. Please ensure that your management team is well aware of the companies H&S policies and procedures.

Did You Know!

In 2016 the CPO was given the ability by the MLTSD to recognize employers with a health and safety program containing specific elements and issue an accreditation, found under section 7.6.2 of the OHSA. Employers have always had to develop Health & Safety Programs as you have done, but there was never any financial benefit to doing so. With this new law, the CPO states that if you have a functioning safety program in place, you could get accredited and be eligible for rebates on your WSIB premiums and a possible reduction in your annual premiums.

You could save a good amount of money if your program meets the standards required, and you can show that you are applying the policies, procedures and rules. There will also be other benefits by getting accredited by the Chief Prevention Officer (CPO) including being part of their list of companies that have demonstrated proper use of their managed safety program. There is a possibility that in the near future, companies may only do business with other companies that are part of the CPO list of accredited businesses.

If you want more information about this new accreditation program go to https://thesafetybus.com/blog/new-accreditation-program-launched-rewarding-safe-companies/

If this accreditation by the CPO or the possible WSIB rebates interests you, **contact us** and let us review your program so we can get you up to speed on the latest standards and requirements.

We realize this is a long list of things to do; however, our goal is to ensure that you understand what is required of your business. Remember, we are only a phone call or email away if you have any questions.

Please let me know if you need anything,

Best regards,

Sheena O'Grady

Industrial Safety Trainers, Inc.