



**SAFE
WORK**

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

**EVERYONE'S
RESPONSIBILITY**



A Guide to Setting up a
**Workplace Safety
and Health Program**

JUNE 2003

A Guide to Setting Up a WS&H Program

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About this guide

A workplace safety and health program is a definite plan of action designed to prevent injuries and occupational disease. Effective workplace safety and health programs have been proven to reduce injuries and illnesses in the workplace.

Safety and health is fundamental to effective planning and operations. It is not an afterthought—it is about doing things right the first time. Likewise, setting up a workplace safety and health program is not just about complying with section 7.4(5) of *The Workplace Safety and Health Act*. The ultimate goal is to make safety and health a core value of the organization. Putting a good safety and health program into practice brings this value to life. How well you implement your program determines its success.

In leading organizations, safety and health is as important as production and cost control. All levels of the organization provide leadership. Managers, supervisors, and workers are involved. They understand their responsibilities for preventing injuries and illnesses and contributing to safe workplaces. Everyone is rewarded for achievements in safety and health, just as they are for achievements in other operational areas.

The Workplace Safety and Health Division has two publications about the workplace safety and health programs. Part I, *Elements of A Workplace Safety and Health Program* discusses regulatory requirements. It helps employers develop a program in places of employment prescribed by the law. This publication, *A Guide to Setting Up A Workplace Safety and Health Program* outlines how to put a program in place.

A workplace safety and health program is a legislative requirement in workplaces with 20 or more workers. The size, hazards, and complexity of your workplace will determine how sophisticated a program you need. Make your program workplace-specific so it will work for you.

Contact the Workplace Safety and Health Division to obtain any Workplace Safety and Health Division publications you need. You may also download Division publications over the Internet through the MB Labour and Immigration Web page at:
<http://www.gov.mb.ca/labour/safety>.

Additional information can also be obtained from the CCOHS Web page at:
<http://www.ccohs.ca/oshanswers/hsprograms/hsprograms.htm>

A note about terms

- Whenever we use the term ‘Act,’ we mean *The Workplace Safety and Health Act*.
- Whenever we use the term ‘regulations,’ we mean regulations under *The Workplace Safety and Health Act*.
- Whenever we use the term ‘committee,’ we mean a *workplace safety and health committee* required by the Act and regulations.
- Whenever we use the term ‘Division,’ we mean the *Workplace Safety and Health Division* of Manitoba Labour and Immigration.
- Whenever we use the term ‘employees,’ we mean *managers, supervisors, and workers*.

Introduction

Too many Manitoba workers are hurt on the job every year. Investigations show that injuries happen more often in workplaces that do not have effective safety and health programs in place.

A workplace safety and health program is a systematic plan to identify and control hazards and respond to emergencies. The program lays out responsibilities, resources, and procedures for keeping the workplace safe and healthy. Its objective is to integrate safety and health into all work practices and conditions.

Studies show that good safety and health programs reduce injuries and occupational illnesses. This is why *The Workplace Safety and Health Act* says employers must design, in consultation with the Workplace Safety and Health Committee, a written workplace safety and health program for each workplace where 20 or more workers of that employer are regularly employed.

The Act also requires/states the following:

- Section 7.4(1) requires employers at workplaces with 20 or more workers to establish and maintain a workplace safety and health program that meets the requirements of Section 7.4(5).
- Section 7.4(2) states that the number of workers employed at a workplace shall be determined by averaging, over the previous 12 months, the number of full-time and part-time workers present each working day.
- Section 7.4(3) states that the Director may issue a written order permitting an employer to establish a workplace safety and health program for more than one workplace or parts of more than one workplace. The Director shall take into account (a) the nature of work performed at the workplace; (b) any request for an order by an employer, worker or union representing the workers at the workplace; and (c) frequency of injury or illness in the workplace or industry in question.

What is a workplace safety and health program?

A workplace safety and health program is the basis for all safety and health activities. Simply put, it is a master plan to:

- 1) Identify and control hazards before they cause injuries or illnesses; and
- 2) Respond to emergencies.

An effective safety and health program benefits all workplaces.

What criteria must the program meet?

- 1) The Act and regulations set out minimum requirements reflecting accepted industry practices. However, every workplace is different and the best way to prevent injuries and occupational illnesses may differ from one workplace to another. **Safety and health programs need to be workplace-specific.** A program developed for one workplace may not meet the needs of another.
- 2) To be effective, a workplace safety and health program needs the active support and commitment of 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.**
- 3) The workplace safety and health program needs worker involvement. **It must be developed in consultation with your workplace safety and health committee.**¹ But, more than that, all employees need to be involved in safety and health activities.
- 4) Everyone must be held accountable for carrying out his or her responsibilities for making the safety and health program succeed. Senior management must be accountable for developing and implementing the program. Individual supervisors and employees should be assigned responsibility for carrying out specific elements of the program. Safety and health should then be assessed on the same basis as any other important part of the job.
- 5) **Each of the program's elements must be in writing.** Elements must be supported with all documents and information covering matters listed in the regulations. If elements of the safety and health program have been implemented in separate procedures and policies, those documents must be referred to in the main safety and health program document.

¹ The Division interprets “consult” to mean that, while not obliged to obtain the approval or permission of the workplace safety and health committee, an employer is obliged to consider, in good faith, the views and opinions of the committee in the process of making a decision.

To fulfil the obligation to consult in good faith, an employer must give the committee a real opportunity:

- **To be informed** of information essential to making a reasonable and informed assessment;
- **To review and assess** the information and possible alternatives or options;
- **To comment** or make recommendations on the possible options and alternatives; and
- **To be considered.** This means the employer will consider the recommendations of the committee and give the committee credible reasons for not accepting or implementing the committee's recommendations.

- 6) **The program must also address the safety and health of contractors, contracted employer(s) or self-employed person(s), and their workers.** If workers from two or more employers that have workplace safety and health programs are working at a construction project site that has a prime contractor, the prime contractor must coordinate the programs of those employers.²
- 7) **The program must be effectively communicated to all employees.** It must be available to your workplace safety and health committee, workers, or a workplace safety and health officer (on request).
- 8) Setting up a program is not simply about producing documents. **A safety and health program is a ‘living thing’ that should be constantly adapted, evaluated, and enhanced to make the workplace healthier and safer.** Effective implementation and monitoring is crucial to its success.
- 9) 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 responsibilities and accountabilities
 - have an evaluation mechanism
 - be available and effectively communicated

² A “**contractor**” means a person who, pursuant to one or more contracts, directs the activities of one or more employers or self-employed persons involved in work at a workplace.

A “**prime contractor**” means the prime contractor for a construction project.

A “**construction project**” means (a) the construction, demolition, repair, alteration or removal of a structure, building, complex, street, road, highway, pipeline, sewage system or electrical telecommunication or transmission line, (b) the digging of, working in or filling a trench or excavation, (c) the installation, modification, repair or removal of any equipment or machinery, (d) any work prescribed by regulation as a construction project.

Why have a safety and health program?

- 1) A good workplace safety and health program can reduce incidents, injuries, and illnesses.
- 2) A good program demonstrates the employer's commitment to leadership and to protecting the safety and health of employees.
- 3) A good program shows the employer is serious about making safety and health a core value in the organization and building it into all operations throughout the organization.
- 4) A good program provides both an internal and external motivation to continuously improve.
- 5) A good program allows you to clearly state 'who is responsible for what' within your organization's safety and health system.
- 6) A good program can make your organization more effective because:
 - the principles of a safety and health program can often be applied to production, quality control, and other areas; and
 - 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.
- 7) A good safety and health program can dramatically reduce costs from:
 - harm to people and damage to property
 - retraining and replacement costs
 - lost or delayed production
 - reduced competitiveness
 - increased insurance costs
 - fines and legal costs
 - damage to reputation and resulting lost business
- 8) A good program helps meet responsibilities under "due diligence" principles.

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. The duty for creating and maintaining a safe and healthy workplace falls on every person in the workplace, to the degree they have the authority and ability to do so. Whether they are the 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 their duty to co-operate in controlling workplace hazards and to take the necessary precautions to protect themselves and others from hazards.

The Act also recognizes that only workers who are adequately informed and empowered can effectively fulfil their responsibilities. It grants three important rights to workers:

- **The right to know** about workplace hazards, including how to identify hazards and protect themselves from those hazards; and about the rights afforded to workers under the Act.
- **The right to participate** in decisions related to workplace safety and health, free of reprisal for their participation. Participation, in part, is achieved through the committee or worker representative.
- **The right to refuse** work believed by the refusing worker to be dangerous.

The Act protects these rights by prohibiting employers from imposing discipline or other sanctions on workers for fulfilling their responsibilities or exercising their rights. This helps 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. But, good safety and health cannot rely on the internal responsibility system 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 their acts (what they do) and omissions (what they fail to do). It goes far beyond simple “regulatory compliance.”

Due diligence contains these concepts:

- **Reasonably practicable** – What is “reasonably practicable” is determined by asking what a reasonable person, in the same position and circumstance, would have done to prevent the incident. When making that determination, three main factors need to be taken into account:
 - (1) foreseeability;
 - (2) preventability; and
 - (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?

- 1) Write a policy that demonstrates your commitment.
- 2) Have adequate systems to identify and control hazards.
- 3) Identify what people, resources, and procedures are needed to deal with emergencies.
- 4) Prepare a statement of responsibilities for safety and health (who is responsible for what).
- 5) Schedule regular and ‘surprise’ planned inspections.
- 6) Develop plans to control chemical and biological hazards.
- 7) Develop procedures to safeguard safety and health when contracted employers or self-employed persons are brought in to do certain work.
- 8) Develop training plans for workers and supervisors.
- 9) Develop a procedure to investigate incidents, dangerous occurrences, and refusals to work.
- 10) Develop ways to involve workers in the program.
- 11) Regularly evaluate and revise your program.

How should you develop your program?

Make your workplace safety and health program workplace-specific so it will work for you. Here are some suggestions:

Show commitment

Workplace safety and health programs cannot succeed without the commitment of 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 employees 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

Involve employees

An effective program needs the experience and knowledge of employees. 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:

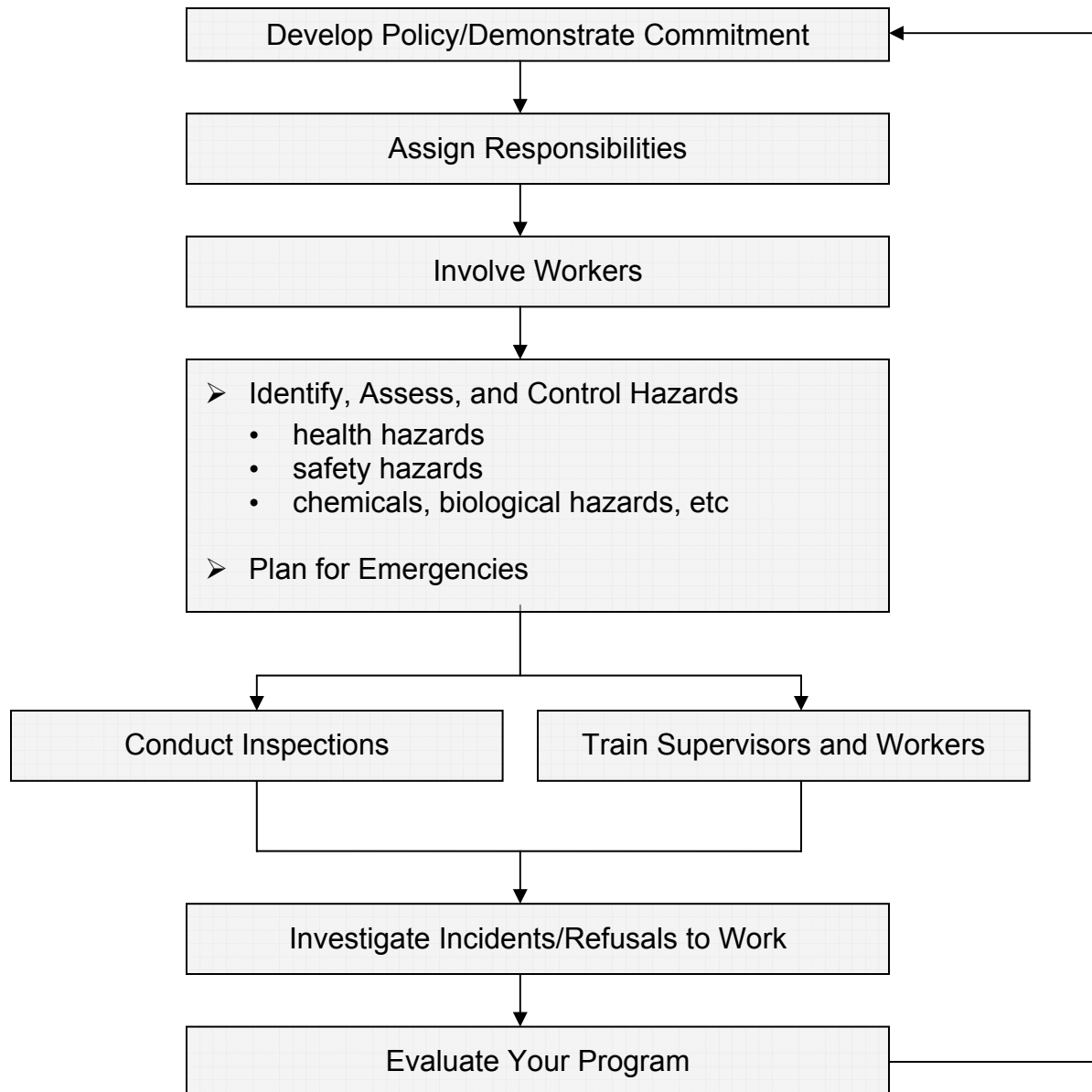
- confirm everyone's commitment to the safety and health program
- set out how employees will be involved
- determine 'who does what'
- decide how employees will be told that a program is being developed
- ask employees for their input and advice
- ask employees how the program can be evaluated and improved

Hold meetings to tell employees 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 employees about:

- the human and financial costs of injuries and illnesses
- the requirements of workplace safety and health legislation
- the commitment of senior management to a safe and healthy workplace
- the importance of everyone's input to the program's development and implementation

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.

How is a program developed?



Write a policy that demonstrates your commitment

- What is a policy statement?
- What principles should be in the policy statement?
- Who should know about the policy?

Introduction

Section 7.4(5)(a) of *The Workplace Safety and Health Act* says that a workplace safety and health program must have “...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 employer(s) or self-employed person(s), prime contractor, and clients about the organization’s commitment to safety and health. It 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
- who is responsible and accountable for elements of the program
- the responsibility of employees and others for safety and health
- a statement that substandard safety and health performance will not be accepted

Your policy statement must:

- 1) Be written, communicated, and posted.
- 2) Be understood by workers.
- 3) Be clear about who is responsible and accountable.
- 4) Identify and allocate resources for implementing the policy.

A policy statement is usually one or two pages long. Many employers post it throughout the workplace and use it as an introduction to the written safety and health program. The policy should not take a back seat to any other policy in your organization. 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.

New workers must be made aware of the policy statement during orientation. Suppliers, contracted employers/self-employed persons and clients should be told about the statement and any sections of the program relevant to their work.

What principles should be in the policy statement?

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 accidents and near accidents will be reported and investigated

Who should know about the policy?

Tell all employees about the statement and their duties under it. Where needed, tell suppliers, contracted employers or self-employed persons, prime contractor and clients about it and about relevant sections of your safety and health program. Tell new workers about the statement and your program during orientation.

Make sure managers, supervisors, workers, and workplace safety and health committee members are trained to carry out their duties within the policy.

Examples of safety and health policies:

- EXAMPLE I -

Workplace Safety and Health Policy

The Board of Directors is committed to providing a safe and healthy work environment for all employees.

The Board recognizes the roles, rights and responsibilities of all employees in the field of workplace safety and health (WS&H) and is committed to ensure that all employees 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 of all employees.

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

EXAMPLE II

Workplace Safety and Health Policy

What is safety and health?

Safety and health is an integral part of our company's work. It is part of our operations and is there to protect our employees, 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 employees, we are also protecting their friends, families, fellow workers, management, the public, and the environment from the far-reaching effects of serious accidents. 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 employees participate in identifying safety needs and in developing safe work procedures.

What are the alternatives to safety and health?

Employees and contracted employer(s) or self-employed person(s) 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 fulfil 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 employees.

All company employees, and others on company work sites, are responsible for obeying all safety and health rules, following recommended 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 workplace.

President and Chief Operating Officer

Date

EXAMPLE III**Workplace Safety and Health Policy**

At ABC Company, the health and safety of our employees 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 employees are required to support the workplace safety and health program.
- Managers are responsible for enhancing safety and health consciousness.
- Supervisors must ensure their employees are trained in safe and healthy work procedures to obtain optimal output without accident and injuries.
- All employees are accountable for implementing this program.

CEO Signature and Date

Summary

- A policy statement is required by Section 7.4(5)(a) of *The Workplace Safety and Health Act*.
- It should tell employees and others at work sites about your commitment to safety and health. It should also set out the principles you will use to maintain a safe and healthy workplace.
- Your policy statement provides guidance and direction to all other areas of the safety and health program, much like a ‘safety and health constitution.’
- Inform all employees about your workplace safety and health program and its policy statement. Make sure new workers are told about them during orientation. Train all employees to carry out their responsibilities.

Notes

Identify and control hazards and emergencies

- What is a hazard?
- What is severity?
- What is a risk?
- How can you identify hazards and potential emergencies?
- How should you use workers' concerns to identify hazards?
- How can you assess risk?
- How can you set priorities?
- How can you communicate information?
- How can you develop, select, and implement controls?
- How should you prepare for emergencies?

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. However, the employer should take all precautions that a reasonable and prudent person would take in the circumstances. Remember that many workplace injuries can be attributed to hazards and risks that people in the workplace have come to consider routine or unimportant.

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

To do this, your system must:

- consistently monitor the workplace for known (and potential) hazards and emergencies
- require workers, supervisors, and managers to report hazards
- assess the risk of those hazards actually hurting workers
- implement effective controls
- ensure managers and supervisors are accountable for taking effective corrective action

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

What is a hazard?

A hazard is any activity, situation or substance that can hurt someone. Workplace hazards are divided into two broad categories: (1) health hazards, and (2) safety hazards.

What is a health hazard?

A health hazard is any agent, situation or condition that can cause an occupational illness. There are five types:

- Chemical hazards (i.e. battery acid and solvents);
- Biological hazards (i.e. bacteria, viruses, dusts, and moulds - often called "biological hazards");
- Physical agents (energy sources) strong enough to harm the body (i.e. electric currents, heat, light, vibration, noise, and radiation);
- Work design (ergonomic) hazards that are associated with musculoskeletal injuries/illnesses (i.e. combinations of forceful exertions, constrained poor postures and long duration/continuous work); and
- Harassment, violence, working alone, etc.

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

What is a safety hazard?

A safety hazard is anything that could cause an injury. Injury caused by a safety hazard (such as a cut or fracture) is usually obvious. Safety hazards cause harm when workplace controls are not adequate. Some examples of safety hazards include:

- slipping/tripping hazards (i.e. electrical cords across floors)
- fire and explosion hazards
- moving parts of machinery, tools, and equipment (i.e. pinch and nip points)
- work at height (i.e. work done on scaffolds or ladders)
- ejection of material (i.e. from moulding operations)
- pressure systems (i.e. steam boilers and pipes)
- vehicles (i.e. forklifts and trucks)
- lifting and other manual handling operations
- materials falling from height, rolling, shifting, or caving-in
- unsafe use of explosives
- workplace violence
- hazards posed by working alone or in isolated workplaces

What is severity?

Severity is the seriousness of the harm that could result from a hazard. It is often described as:

- catastrophic (death and/or permanent injury)
- critical (serious injury)
- marginal (minor injury)
- negligible (no injury)

What is a risk?

Risk describes the odds that a hazard will cause harm. It refers to the probability and severity of potential incidents, dangerous occurrences, near misses and emergencies (fires, etc.).

How can you identify hazards and potential emergencies?

Organize inspections

Inspections include:

- inspections of tools and machinery by workers at the start of the shift
- regular inspections of the work area, work processes, and work procedures by the supervisor
- regular inspections of equipment, machinery, etc. by technicians
- regular, planned inspections by the workplace safety and health committee

Discuss concerns with workers

This includes:

- arranging for supervisors to hold regular work group meetings or ‘tool box talks’
- requiring and encouraging workers to report concerns about potential hazards so they can be promptly and thoroughly investigated
- taking workers’ concerns and suggestions seriously
- discussing concerns with workers everyday
- planning regular meetings of the workplace safety and health committee to discuss concerns and recommend corrective action

Review documents

This includes:

- material safety data sheets (MSDSs) and product labels
- compensation claims
- injury and inspection reports
- maintenance reports
- product literature (users' guides, maintenance books, etc.)
- committee minutes
- legislation, industry best practices, municipal bylaws, relevant safety standards, etc.

Use a job hazard analysis

A job hazard analysis (JHA)³ involves:

- breaking down each job into its steps
- analyzing the hazards present at each step
- developing controls for those hazards
- writing safe work procedures based on each analysis
- testing, revising, and implementing the written work procedures
- regularly reviewing each job procedure and keeping it current

Product literature, industry publications, legislation, and safety and health publications are useful starting points for developing JHAs.

A job hazard analysis usually involves observing an expert worker doing the selected job. Ask for volunteers. Explain to each volunteer why the JHA is being done and how it will be done. Make it clear that the job and not the worker, is being studied.

Some workplaces use group discussions to perform JHAs on new procedures and infrequently performed jobs.

Some work procedures consist of several complex tasks. Several JHAs may therefore be needed.

³ Also called a job safety analysis

How should you use workers' concerns to identify hazards?

Requiring and encouraging workers to promptly report safety and health concerns is a proactive way of preventing injuries and illnesses. You should have a system in place that:

- requires and encourages workers to report concerns to supervisors
- protects workers from reprisals if they do raise concerns
- requires supervisors to ensure workers do raise concerns and are protected from reprisals if they do so
- requires supervisors to promptly correct concerns and document what was done
- Evaluates the safety performance of your employees in the same way you evaluate performance in other areas.

You can also conduct informal interviews with workers to get information on incidents or near misses that affected them, or that they witnessed or heard about.

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

Regular workplace safety and health committee inspections and meetings are a good source of information about workplace hazards.

Committees are useful for encouraging workers to discuss their concerns and suggest solutions.

Committee inspections can focus on the general physical conditions of the workplace. Committees can support the safety and health activities of supervisors and workers by finding defects workers and supervisors have become 'used to.' In some case, committee inspections may focus on special problems in the workplace.

What are the steps in investigating concerns?

- 1) Require and encourage workers to bring specific concerns to their supervisor and general concerns to the committee. For example, a defect in a machine should be promptly drawn to the attention of the local supervisor. A concern about the adequacy of orientation provided to new workers can be brought to the workplace safety and health committee.
- 2) If the problem cannot be resolved with the supervisor or manager, take it to the local committee for investigation. Keep the worker and supervisor informed during the investigation.
- 3) The committee can help the worker and employer by gathering information on the risks posed by each identified hazard and various alternative courses of control action. Information can be obtained from industry safety associations, the Workplace Safety and Health Division—and from equipment, tool and material suppliers. Recommendations should be taken to the employer for corrective action. Workers should be kept informed during the investigation.
- 4) The committee can help everyone concerned by monitoring the effectiveness of the corrective action taken by the employer.

How can you assess risk?

You need to determine the seriousness of the risk associated with each hazard. The combination of identifying hazards and assessing their risk is called *risk analysis*. Risk analysis can help set priorities.

Risk = Probability x Severity

To assess risk, decide what the chances are of each hazard hurting someone.

Consider:

- the seriousness (severity) of the potential harm each hazard and emergency could cause and the likelihood of it actually causing harm (probability)
- what additional hazards could be caused by hazards and emergencies (for example, vehicle accidents caused by emergency crews rushing to the scene)
- how many workers could be hurt
- how often workers are exposed to the hazard
- how quickly danger could arise
- hazard monitoring and control requirements
- how well current monitoring, controls, and emergency response systems are working and have worked in the past
- reports about the current status of the hazard and hazard controls and the adequacy of emergency response plans

Hazards with a risk of serious injury, and hazards to which workers are exposed frequently or for long periods of time, are your top priority for control.

How can you set priorities?

Determine which hazards should be controlled first. Normally, hazards with the highest risk that affect the most workers should receive the greatest attention. Remember, however, that all hazards must be controlled. The workplace must be safe and healthy.

Hazard ranking systems

Substandard conditions may range from minor to life threatening. Rank hazards to set priorities for corrective action. This will ensure that resources are used efficiently and quickly to protect workers.

A Simple Risk Level Estimator			
Likelihood of Harm	Slightly Harmful	Harmful	Extremely Harmful
Highly Unlikely	Trivial Risk	Marginal Risk	Moderate Risk
Unlikely	Marginal Risk	Moderate Risk	Substantial Risk
Likely	Moderate Risk	Substantial Risk	Unacceptable Risk
A Simple Risk-Based Control Plan			
Risk Level	Action and Time scale		
Trivial Risk	No action is required and no documentary records need to be kept.		
Marginal Risk	No additional controls are necessary. Consideration by the workplace parties may be given to a more <i>reasonably practicable</i> solution. ⁴ Monitoring is required to ensure that the controls are maintained.		
Moderate Risk	Efforts should be made to reduce the risk, but the costs, in time, trouble and money, of prevention should be carefully measured and limited. Risk reduction measures should be implemented within a defined time period. Where the moderate risk is associated with extremely harmful consequences, further assessment may be necessary to establish more precisely the likelihood of harm as a basis for determining the need for improved control measures.		
Substantial	Work should not be started until the risk has been reduced. Considerable resources may have to be allocated to reduce the risk. Where the risk involves work in progress, urgent action should be taken.		
Unacceptable	Work should not be <u>started</u> or <u>continued</u> until the risk has been reduced. If it is not possible to reduce risk even with unlimited resources, work has to remain prohibited.		
Definitions:			
Slightly harmful examples – superficial injuries, minor cuts and bruises, eye irritation from dust.			
Harmful examples – lacerations, burns, concussion, serious sprains, minor fractures.			
Extremely harmful examples – amputations, major fractures, poisonings, multiple injuries, fatal injuries, occupational cancer, other severely life shortening diseases, acute fatal diseases.			
Note: “Marginal” here means the risk has been reduced to the lowest level that is <i>reasonably practicable</i> .			

⁴“Reasonably practicable” is determined by asking what a reasonable person, in the same position and circumstance would have done to prevent the incident. When making that determination, three main factors need to be taken into account: (1) foreseeability; (2) preventability; (3) control.

How can you communicate information?

To help prevent injuries and illnesses, workers have to understand the risks of the job, and how those risks are to be controlled. Methods of communicating information about hazards include:

- 1) Ensuring anyone at risk and anyone responsible for ensuring the safety of others understands the risks and how to control them.
- 2) Implementing safe work procedures and making compliance a condition of employment.
- 3) Making supervisors responsible and accountable for ensuring that workers understand and use safe work procedures.
- 4) Educating workers on the risks, the use of hazard controls, and safe work procedures. Start safety and health education right away by orientating new workers and workers transferred to new jobs. Make sure workers are trained when new equipment or procedures are implemented and when there is inadequate safety performance.
- 5) Requiring other employers or self-employed persons at your work site to implement safe work procedures and educate their workers.

It is more effective to totally integrate safety and health into normal work procedures than it is to have one procedure for safety and health and another for production or customer/client service.

How can you develop, select, and implement controls?

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. For example, workers can be required to use a specific work procedure to prevent harm.

One type of hazard control may not be completely effective. A combination of several different types of hazard controls often works well. Whatever method is used, you should try to find the root cause of each hazard and not simply control the symptoms. For example, it might be better to redesign a production process than to simply improve a job procedure. In some cases it may be better to replace, redesign, isolate, or quiet a noisy machine than to simply issue nearby workers with hearing protectors.

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 (due to explosion hazards).

Substitution – If elimination is not practical, try replacing hazardous substances 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 the hazard 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 mechanised. 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?

Hazards that cannot be isolated, replaced, enclosed, or automated can sometimes be removed, blocked, absorbed, or diluted before they reach workers. Usually, the further a control keeps a hazard away from workers, the more effective it is.

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. However, it is not effective for substances that are harmful in low concentrations. It may spread dusts through the workplace rather than removing them.

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

Control at the level of the worker includes personal protective equipment (PPE), safe work procedures, training, etc. This control usually does not remove the risk posed by a hazard. It only reduces the risk of the hazard injuring the worker and lessens the potential seriousness of an injury. Therefore, most safety experts consider control at the level of the worker to be the least effective method of hazard control.

What are administrative controls?

Administrative controls include:

- introducing new policies;
- improving work procedures; and
- requiring workers to use specific personal protective equipment and hygiene practices.

Job rotations and 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. Standardized written work procedures can ensure that work is done safely. Employees can be required to use shower and change facilities to prevent absorption of chemical contaminants.

The employer is responsible for enforcing administrative controls.

Safe work procedures – Safe work procedures state how to perform each job safely, step-by-step. Use a job hazard analysis to develop each procedure. Involve workers because they must use the procedures on the job. Describe each step in positive terms, pointing out the reasons why the job must be performed this way. Refer to any required rules, regulations, and personal protective equipment. Use the following techniques to ensure workers understand safe work procedures:

- if there are written work procedures for a job, make them available to each worker who must do that job
- cover applicable safe work procedures during orientation
- post procedures on bulletin boards
- explain safe work procedures in meetings
- coach workers and conduct one-on-one training sessions
- explain procedures in coaching and one-on-one training sessions
- hold managers, supervisors, and workers accountable for safe work procedures

Example of what to consider when preparing a work procedure

Consider new equipment being installed in your workplace. Determine if special procedures are required to protect workers who operate or service the equipment. Consider noise and vibration—have you chosen the quietest piece of equipment? What about ventilation—will harmful emissions be captured and removed before workers are affected? What about lockout* requirements that will enable the machine to be serviced safely?

If your assessment shows that it will be necessary to lock-out the control devices to service or repair the equipment, you should **take the following steps to prevent injuries:**

- 1) Install devices that allow locks to be applied.
- 2) Develop written procedures that describe a step-by-step process for locking out all required points on the equipment, getting rid of trapped energy in the mechanism and checking that the locked-out equipment can't be operated or started accidentally.
- 3) Train workers in the procedures and document the training.
- 4) Post the procedures at each applicable place of employment.
- 5) Issue locks to the workers.
- 6) Post signs on or near the equipment reminding workers that lockout procedures are required for servicing the equipment.
- 7) Watch the workers the first few times that they use the procedures. Ensure they know how to repair the equipment safely.
- 8) Monitor the lockout procedures from time to time to ensure that workers are using the required practices. Correct unsafe work practices on the spot and provide refresher training as necessary.
- 9) Coach the worker in the correct procedures to use.
- 10) Develop and use a system to monitor the health and safety performance of managers, supervisors, and workers—and hold them accountable.
- 11) Review your lockout program at least once every year to determine its effectiveness.
- 12) Document the review process and corrective action you take.

**Lockout* means to shut off the power to the machine, get rid of any residual energy trapped in the mechanism, and block parts that could crush or entangle workers repairing the mechanism. A lock for each worker repairing the machine is usually put on the power sources, switches, or starting devices. This protects workers who must work on the equipment.

Training – Supervisors can be trained to apply modern safety management and supervisory practices. Workers can be trained to use standardized safe work practices. Refresher training should be offered periodically. The employer and supervisors are expected to ensure that employees follow safe work practices. The committee should help the employer periodically review and update operating procedures and worker training.

Supervision – The employer must provide enough competent supervisors to protect workers.⁵ New and inexperienced workers must be supervised closely.

Housekeeping, repair and maintenance programs – This includes cleaning, waste disposal, and spill cleanup. Tools, equipment, and machinery are less likely to cause injury if they are kept clean and well maintained.

Hygiene practices and facilities – Hygiene practices can reduce the risk of toxic materials being absorbed by workers or carried home to their families. Street clothing should be kept in separate lockers to avoid contamination from work clothing. Eating areas can be segregated from work areas. Eating, drinking, and smoking should be forbidden in toxic work areas. Where applicable, workers may be required to shower and change clothes at the end of the shift.

Personal protective equipment (PPE) and clothing – This is used:

- where other controls aren't feasible, (for example, when using chainsaws)
- where additional protection is needed
- where work is temporary (such as periodic maintenance work)

PPE is much less effective than engineering controls since it does not eliminate the hazard. It must be used properly and consistently to be effective. Awkward or bulky PPE may prevent a worker from working safely. In some cases, PPE can even create hazards, such as heat stress.

It is the job of the employer, managers, and supervisors to require workers to use PPE wherever workplace procedures require it. Workers must be trained to use, store, and care for their equipment properly. The employer, supervisor, and workers must understand the limitations of their personal protective equipment. Use coaching and progressive discipline to ensure PPE is used properly.

How can you keep controls effective?

Monitor the effectiveness of controls during inspections and other safety and health activities. Ensure engineering controls, (ventilation systems etc), are regularly maintained by competent people.

⁵ “**Competent**” means possessing knowledge, experience and training to perform a specific duty safely.

“**Competent worker,**” with respect to a particular task or duty, includes a worker who is being trained to perform that task or carry out that duty and who is under close and competent supervision during that training.

How should you prepare for emergencies?

You must have emergency procedures to address predictable emergencies such as:

- an incident causing serious injury or damage
- fires and explosions
- major releases of hazardous material or organisms
- major traffic accidents and train derailments
- floods and wind storms

When an emergency occurs, decisions must be made quickly. Injury and suffering are made worse when time, resources, trained responders, and equipment are lacking. For example, a Manitoba logger was seriously injured deep in the bush during winter. Adequate plans for transporting injured workers had not been prepared. The employer had to take the injured worker to hospital in the back of an open half-ton truck. The worker contracted pneumonia and nearly died.

Effective written plans should be made to handle emergencies and prevent or minimize fatalities, injuries, and loss. Assemble adequate resources. Train everyone to follow procedures and use appropriate equipment. Provide refresher training regularly.

Make sure your organization has the necessary people, procedures, and resources in place. Clearly define 'who is responsible for what'. Make a senior manager accountable for emergency planning.

Summary

- Section 7.4(5)(b) of *The Workplace Safety and Health Act* requires a system to identify, assess, and control hazards and emergencies. The system should be built into all production and service procedures.
- Your system must monitor known hazards, look for potential hazards, and introduce effective controls.
- Make a senior manager or supervisor accountable for the system and involve workers in drawing it up and monitoring it.
- A hazard is anything that could hurt someone. Hazards are divided into two groups—health hazards, and safety hazards. Health hazards cause occupational illnesses. Safety hazards cause physical injuries.
- To identify hazards and potential emergencies organize inspections, discuss concerns with workers, review documents, and use Job Hazard Analysis to develop written safe work procedures.
- To assess the risk of hazards injuring workers, measure the probability of each hazard harming workers against the severity of the injuries each hazard could cause.
- Once hazards have been identified and assessed, set control priorities.
- Communicate information about each hazard to the workforce. Make sure everyone knows what to do to prevent injury.
- Develop and implement controls at the source, along the path to the worker, or at the level of the work. Use whatever controls will be most effective under the circumstances.
- You should have effective written emergency response plans to protect workers in case of accidents or disasters. *Pay the same attention to emergency planning as you do to any other activity of the organization.*

Notes

Identify people and resources required to deal with emergencies

- How important is it to prepare for emergencies?
- What must emergency response plans do?
- What authority structure must the plan set out?
- What resources must the plan identify?
- How should you prepare emergency response plans?

Introduction

Your safety and health program must identify the people and resources needed to support the emergency response. Section 7.4(5)(c) requires a plan for “*the identification of internal and external resources, including personnel and equipment, that may be required to respond to an emergency.*”

An emergency is usually an incident or disaster causing serious injury 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

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

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.

The employer sets up the plans. A senior manager or supervisor should be accountable for keeping plans effective. The committee provides input and monitors the plan’s effectiveness. Document your plan and keep copies on file.

How important is it to prepare for emergencies?

When an emergency occurs, decisions must be made and resources brought into use quickly. Chaos and suffering result when time, resources, trained responders, and equipment are lacking.

What must emergency response plans do?

Your plans must:

- 1) Identify situations (fires, explosions, spills, leaks, etc) that will activate your response plans.
- 2) 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 authority structure must the plan set out?

The plan must describe:

- who will carry out the emergency plan(s)
- the duties and responsibilities of each person
- the training and resources required to ensure emergency responders are competent to carry out their duties

What resources must the 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)

The plan should include the following:

- a fire safety plan
- any applicable mine rescue requirements
- emergency procedures required to deal with accumulations, spills, or leaks of hazardous chemicals or biological substances

How should you prepare emergency response plans?

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

- 1) 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.
- 2) Consider past and potential emergencies (i.e. fires, explosions, and train derailments).
- 3) Consider the harm each emergency could cause (i.e. 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.
- 4) Set up clear responsibilities for managing each emergency. Pay special attention to emergencies that may happen at remote work locations.
- 5) Establish clear responsibilities for communicating from the organization's command centre to workers, the authorities, (fire, police, hospital, and government), and the media. Make sure those in charge will be able to talk to each other during an emergency. Plan how to compassionately and effectively deal with the families of workers who could be endangered by an emergency.

- 6) 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.
- 7) Consider how to prevent cross-contamination of work areas through the ventilation system.
- 8) Carefully equip, train, and prepare decontamination teams, fire suppression crews, and other specialized units where needed. Make sure replacement members are available for absent personnel.
- 9) Have a system in place to allow staff to rapidly access information on toxic or infectious materials, and toxic decomposition products.⁶ List external sources of information. Keep the list current.
- 10) Write out decontamination procedures and prepare decontamination areas (either indoors or outdoors).
- 11) 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.
- 12) Assemble resources for each emergency. For example, make sure you have the proper products readily available to fight chemical fires. Keep products fresh.
- 13) Make sure all employees know what to do in each emergency. Train all employees to carry out their responsibilities competently. If possible, regularly rehearse each emergency response drill to keep skills current.
- 14) List equipment suppliers, chemical suppliers, and other vendors. Keep the list current.
- 15) 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. Decide which ambulance services and hospitals will care for casualties. Keep your lists current.
- 16) 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.
- 17) Hold regular practice sessions with emergency response organizations.
- 18) If an emergency occurs, ensure that the workplace is safe before allowing workers to return to work.

⁶ “**Toxic decomposition products**” are harmful substances given off during the breakdown (such as by heat, chemical reaction, or rotting) of chemicals or substances.

Main elements of a workplace fire protection plan:

Storage of combustible and flammable materials

Combustible materials are fire rated. They should be stored appropriately to prevent accidental fires. Flammable materials can be isolated, such as in a separate building or room, or specially compartmentalised in one section of the storage space. The greatest danger is storing flammable material throughout a building and overloading the fire rating which the building systems were designed to protect. Consult the local fire authority for specific requirements.

Portable fire extinguishers

Portable fire extinguishers are to be installed, as required. They are to be used if there is a fire. Extinguishers are effective only during the initial stages of a fire (2-3 minutes) when used by trained individuals.

A fire extinguisher program should be developed and maintained in the premises. The fire extinguisher program includes selection, location, inspection, and training.

Building evacuation

The prevention of fires is the primary goal of all fire protection plans. Nevertheless, programs must ensure the safety of occupants in the event of a fire.

Evacuation plans consist of the following elements:

- recognition of fire/fire hazard
- evacuation procedure
- assembly/roll call
- safe re-entry
- debriefing after the evacuation
- emergency drills

Recognition of fire/fire hazard

All occupants in a building will be trained to respond to a fire emergency. Individuals should know where the alarm switches are and how to use them. They should know: what the fire alarm sounds like, where both the primary and alternate exits are, and what escape routes must be used.

Evacuation procedure

Once alerted, each person must move at a fast walk (do not run) to the assigned exit. If it is blocked, go to the alternate clear exit for your area. Make sure that exits, doors, and routes throughout the facility are unblocked. Shut down operating machines, close filing drawers, cabinets, and doors as you leave the work area.

Designate people in each area to ensure everyone leaves during a drill or an emergency. Check washrooms, storage areas, and other places where employees are likely to be alone.

Assembly and roll call

Identify designated locations where employees and occupants must assemble after leaving the building. Identify everyone in the assembly area. This will ensure no one is left in the building. Report missing individuals to the fire officer in charge. Do not re-enter the building until the all clear is given by those in charge.

Safe re-entry

At this time, evacuees will return to the building. Further instructions will be given to employees and other building occupants. Everyone will be told when the officials finally declare the building safe. If the building is not safe to enter, other work arrangements will be made.

Debriefing

The emergency planning co-ordinators will evaluate all facets of the emergency response, and where necessary, improve the plans.

Emergency drills

Drills ensure that the plans and procedures will be effective in an actual emergency. Drills give everyone the skills needed in an emergency. Studies show that employees panic and are seriously hurt when they do not know what to do. However, they will act appropriately when regular drills are conducted. The rewards of a quick, orderly response to an emergency outweigh the inconveniences caused by drills.

Summary

- You must have effective written emergency response plans to minimize suffering and loss.
- The employer is responsible for putting plans into effect. The safety and health committee provides input and monitors the plans' effectiveness.
- Plans must identify when an emergency exists and what people, resources, and actions must be brought into play to protect workers and control the situation.
- Effective plans need a clear and effective chain of command. Everyone in the command structure must know what to do and be trained to do it properly.
- Identify what resources your plan requires. Keep adequate resources on hand or provide a system to access them quickly from vendors.
- Detail exactly what must be done to control each emergency you could have at the workplace. Identify and involve local emergency response agencies.
- Regularly monitor and update your plans carefully.

Notes

Prepare a statement of responsibilities

- What are *responsibility* and *authority*?
- What are the responsibilities of employers and senior managers?
- What are the responsibilities of managers and supervisors?
- What are the responsibilities of workers?
- What is the role of the workplace safety and health committee?
- What are the responsibilities of safety co-ordinators?
- What are the responsibilities of owners?
- What are the responsibilities of contractors?
- What are the responsibilities of contractors and self-employed persons?
- What are the responsibilities of suppliers?

Introduction

Your safety and health program's success depends on clear responsibility and ensuring accountability.

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."

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. Hold a senior manager accountable. **Make specific managers and supervisors accountable for implementing each program element.** For example, name the employee(s) 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 and put them 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.

Document your statement and keep copies on file. Do this with each element of your safety program.

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 what their responsibilities are
- 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.

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 persons not in the employer's service are not exposed to risks to their safety or health arising out of, 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 work in the manner and in accordance with the 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 analysing 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?

Owners have responsibilities under the *Workplace Safety and Health Act*.⁷ These 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 which involves more than one employer or self-employed person

⁷ “Owner” includes:

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

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 and self-employed people, and workplace safety and health committees in protecting the safety and health of everyone in the workplace
- ascertaining what their responsibilities are in relation to the safety and health of all workers 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 which 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

Summary

- Your program's success depends on clearly defined responsibilities and accountabilities.
- Handle safety and health responsibilities just as you handle responsibilities in any other area of the organization.
- Responsibility means being accountable for carrying out a task. Authority is the right to direct others. Specific responsibilities reflect the needs of the individual workplace.
- The employer at the workplace remains accountable for the safety and health program.
- Managers are responsible for implementing the employer's safety and health program. This includes ensuring their subordinates have adequate training, resources, and time to carry out their responsibilities properly.
- Supervisors run the program in each work area.
- Workers carry out their responsibilities within the program, such as following safety rules, using correct tools, personal protective equipment, etc.
- If you hire an outside company or self-employed person on a contract and direct their activities, then you become a 'contractor' under the Workplace Safety and Health Act. You are responsible for selecting, evaluating, and monitoring the outside company or self-employed person. Contracted employers and self-employed persons are responsible for work they control.
- A prime contractor is required on a construction project where there is more than one employer or self-employed person involved in the project.
- Suppliers are responsible for providing safe products, when used as directed. This includes a duty to provide instructions for the safe assembly, use, and disassembly of their products or equipment.
- Owners are expected to make sure that their work places are safe. This includes a responsibility to warn others of hazards.
- Professional safety co-ordinators are expected to help everyone to carry out their duties properly.
- Everyone must know and follow applicable sections of the Workplace Safety and Health Act and regulations.

Notes

Notes

Schedule inspections

- What types of inspections should be done?
- Who is responsible for what within the inspection schedule?
- When should inspections be carried out?
- What should be inspected?
- What checklists and reporting procedures should be used?
- What training is required?
- How can defects be corrected?

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. Generally speaking, there are two types of inspections—informal inspections and formal, planned 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.”

Informal inspections – These are, in reality, the conscious awareness of safety and health hazards and controls 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, 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, 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

Section 40(10)(h) of The Act requires the employer to enable the workplace safety and health committee to inspect the place of employment at regular intervals. It is recommended that your safety and health committee inspect the workplace before each regularly scheduled meeting.

Your inspection schedule must:

- identify what will be inspected, (work areas, equipment, tools, procedures, practices, etc), by whom, and how frequently
- include inspections of work procedures and production processes
- state what inspection records must be produced to ensure accountability
- provide for correcting defects found during each inspection
- state what training those who carry out inspections require

Document your inspection activities and keep copies on file. Do this with each element of your safety program.

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 focussing on parts of equipment and machinery, materials, structures, or worker areas that are more likely than others to cause accidents when they become worn out, damaged, or are improperly used.

- 4) **Housekeeping inspections** – Good housekeeping prevents many accidents. 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 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 accidents 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.

Who is responsible for what within the inspection schedule?

Workers, operators, supervisors, maintenance personnel, safety professionals, and others can carry out inspections. Some inspections are best carried out by someone with specialized training; some are best done by mechanics and maintenance personnel, and some are best done by supervisors and workers. As a general rule, the 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 anyone given inspection responsibility gets the training they need to fulfil their responsibilities.

When should inspections be carried out?

Schedule inspections of buildings, work areas (including storage rooms and travel ways), machinery, tools, equipment, production processes, and work procedures. Inspections 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 than others. Pre-use equipment checks, for example, will be much more frequent than planned general inspections. Depending on the type of inspection, the frequency might be—before use, when issued, when serviced, daily, weekly, monthly, quarterly, or annually.

When deciding the frequency, consider:

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

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 accidents and illnesses, such as:

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

What checklists and reporting procedures should be used?

Checklists – Where appropriate, prepare or purchase and adapt checklists of what to inspect for equipment, vehicles, work processes, etc. Checklists help make inspections thorough. Have inspectors look for the root causes of defects.

Reporting and recording forms – Decide what recording forms will be used to (1) identify what was inspected (items and areas), and (2) report exemplary 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. You or the committee may need them to track corrective action and review the history of specific concerns.

**Example of items to be included in a
planned inspection checklist:**

1. Environment: dust, gases, noise, temperature, ventilation, lighting.
2. Floors: slipping and tripping hazards, cluttered aisles.
3. Building: windows, doors, floors, stairs, roofs, walls, elevators, fire exits, docks, ramps.
4. Containers: scrap bins, disposal receptacles, barrels, carboys, gas cylinders, solvent cans.
5. Electrical: switches, cables, outlets, grounding, extension cables, ground fault circuits.
6. Fire Protection: fire extinguisher, hoses, hydrants, sprinkler systems.
7. Hand Tools: wrenches, screwdrivers, power tools, hydraulic tools, explosive actuated tools, pressurized tools.
8. Hazardous Materials: flammables, explosives, acids, corrosives, toxic chemicals.
9. Materials Handling: conveyors, cranes, hoists, hoppers, manual lifting, forklifts.
10. PPE: hard hats, safety glasses, respirators, gas masks, gloves, harness, lifeline.
11. Pressurized Equipment: boilers, vats, tanks, piping, hoses, couplings, valves, cylinders.
12. Production Equipment: mills, cutters, drills, presses, lathes, saws.
13. Support Equipment: ladders, scaffolds, platforms, catwalks, staging, aerial lifts.
14. Powered Equipment: engines, electrical motors, compressor equipment.
15. Storage Facilities: racks, bins, shelves, cabinets, closets, yards, floors, lockers, store rooms, mechanical rooms, flammable substances cabinets.
16. Walkways & Roads: aisles, ramps, docks, vehicle ways, catwalks, tunnels.
17. Protective Guards: gear covers, pulleys, belt screens, workstations, guards, railings, drives, chains.
18. Devices: valves, emergency devices, warning system limit switches, mirrors, sirens, signs, cover-plates, lighting systems, interlocks, local exhaust systems.
19. Controls: start-up switches, steering mechanisms, speed controls, manipulating controls.
20. Lifting Devices: handles, eye-bolts, lifting lugs, hooks, chains, ropes, slings.
21. Hygiene & First Aid: drinking fountains, washrooms, safety showers, eyewash, toilets, fountains, first aid supplies.
22. Offices: work stations, chairs, computer equipment, ventilation, floors, stairs, equipment, emergency equipment, storage cupboards.

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:

- 1) **The purpose of inspections** – what inspections accomplish
- 2) **Inspection planning** – where, when, what, who, and how
- 3) **Finding hazards** – hazard recognition techniques, including how to find not so obvious hazards, such as chemical contamination, or other work environment hazards
- 4) **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
- 5) **Reporting procedures** – how to record defects and follow-up
- 6) **Hazard priority systems and processes** – how to categorize and prioritize hazards and find root causes
- 7) **Hazard control** – how to categorize, select, develop, and implement hazard controls, or recommend corrective action
- 8) **Follow-up** – how to ensure corrective action works
- 9) **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 implement 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.

Summary

- Inspections are one of the most common and effective tools for identifying and correcting problems before they cause injuries and occupational diseases.
- There are two general types of inspections—informal and formal.
- Informal inspections are, in reality, the conscious awareness of safety and health hazards and controls as people do their jobs.
- 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.
- Section 40(10)(h) of *The Workplace Safety and Health Act* requires the employer to enable the workplace safety and health committee to inspect the place of employment at regular intervals.
- The employer must schedule regular inspections of items such as work processes and procedures to find hazards and potential hazards in the place of employment. Your inspection schedule should be as good as any other schedule in the organization.
- The work performed determines what requires inspecting and when inspections should be conducted. Organize an inspection system that will effectively review the safety of every hazardous or potentially hazardous area of the organization.
- Make or purchase and adapt appropriate checklists and inspection reporting forms. Document and keep good records of your inspection activities.
- Provide the training inspectors need to be competent.
- Immediately correct life-threatening dangers found on inspections. Use the principles of hazard assessment and control to develop solutions to all hazards. Search for the root causes of defects.
- Ask workers and supervisors for suggestions on how to fix defects. Keep employees who have raised concerns informed. Use normal communication channels to provide information to the workforce.
- Regularly evaluate your inspection schedule, just as you evaluate other activities of the organization.

Notes

Notes

Develop plans to control chemical and biological hazards

- What are chemical and biological hazards?
- How can these hazards be controlled?
- What steps should be taken to prepare plans?
- What about WHMIS plans?
- What about chemical and biological substances with assigned Occupational Exposure Limits (OELs)?
- What about *designated* materials?
- What about *infectious* substances?
- What about pregnant workers and workers who are hypersensitive or unusually responsive to a substance?

Introduction

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

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.*”

A successful plan requires the commitment and leadership of the employer. The employer sets up the plan; the workplace safety and health committee provides input and advice. Use workplace safety and health committee inspections and other activities to audit the plan’s effectiveness. Include the plan in your safety program and document your activities. Keep file copies. A senior manager should run the plan. Everyone should have clear responsibilities and accountabilities.

Your plan to control chemical and biological substances must meet these requirements:

- Manitoba Regulation 53/88, *Workplace Health Hazard Regulation*. The employer must protect workers from the hazards of chemical and biological substances. Your plan must meet the requirements set out in Section 33 of Manitoba Regulation MR53/88. This regulation also requires the employer to protect workers from biological hazards that are either known or suspected causes of human infections.
- Manitoba Regulation 52/88, *Workplace Hazardous Materials Information System (WHMIS)*. The employer must protect workers from products controlled under WHMIS.

For detailed information, read the Division's publication: *Guidance Manual for the Workplace Health Hazard Regulation*.

What are chemical and biological hazards?

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

What are chemical hazards?

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

- dusts (very fine particles that have become airborne)
- fumes (an airborne solid given off during melting)
- mists (splashes or sprays)
- smoke (substances given off during burning)
- vapours (chemicals combined with air during evaporation)

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

What are 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 (substances given off by some plants can cause allergies. Several plants contain poisonous substances)

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 can be exposed to them when the substances are released into the workplace. For example, hazardous products can be given off during welding, sawing or grinding, dry-cleaning, or during mining 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 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.

Your chemical and biological hazards plan must identify and control any of these hazards in your workplace.

How can these hazards be controlled?

Manitoba Regulation 52/88 and 53/88 set out how to control chemical and biological substances. The employer, with input and advice from the workplace safety and health committee, must:

- maintain an inventory of workplace substances that could hurt someone when handled, used, stored, produced, or disposed of at the place of employment
- obtain current hazard information about these substances
- reduce contamination in the place of employment
- prevent workers from being harmfully exposed
- develop and implement safe work procedures and processes
- train workers to know how to protect themselves and those around them
- teach workers safe work procedures and production processes

What responsibility and accountability is required?

The plan should assign responsibilities to those who order, purchase, and receive chemical and biological substances and you must hold them 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 assessed 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 is required by Manitoba Regulation 53/88?

Manitoba Regulation 53/88 discusses hazards caused by exposure to infectious materials or organisms.

Exposure is defined as any harmful contact by:

- inhalation (for example, breathing in mould spores)
- ingestion (for example, swallowing bacteria while eating or smoking)
- absorption through the skin or mucous membranes (for example, entry through pores)
- injection (for example, needlesticks)

Manitoba Regulation 53/88 requires the employer to implement a written control plan that:

- identifies workers who may be exposed
- sets out how those workers could be exposed
- sets out disinfection procedures and other hazard controls
- specifies what training and information workers must have

What steps should be taken to prepare plans?

The needs of the workplace determine what must be in your plan. The *Workplace Safety and Health Act* lists the general duties of the employer to protect workers from hazards. 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. Think about where, when, how, why, 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), workers' 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) Build safety and health into all work procedures. Develop safe work practices where needed.
- 9) Train workers to handle hazardous substances safely. Tell them:
 - how each substance causes harm
 - what harm is involved
 - how serious the harm can be
 - the risks of being harmed
 - how to reduce exposure
 - how to prevent harm
 - what to do during an accident or emergency
- 10) The workplace safety and health committee provides advice and audits the effectiveness of the training.
- 11) Determine how safely flammable, unstable, highly reactive, and corrosive substances are stored by your organization. Correct any defects.
- 12) Prepare emergency plans. Include them in your safety program. Think about what could happen if there is an accident with a hazardous substance. What emergency response plans are required?

What about WHMIS plans?

Use the Federal publication *Manner of Establishing Classification (Sections 33-66 of the Controlled Products Regulation (CPR))* to help identify products controlled under WHMIS. Products that easily burn, explode, or produce toxic reactions, allergies, infectious diseases, or dangerous reactions are likely to be controlled products. Check the labels and MSDS for hazard warnings. If in doubt, check with the supplier.

The WHMIS component of your safety program should:

- state who is responsible for obtaining and updating MSDS and product labels required by WHMIS
- use the information to implement 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 a competent person(s) 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 I of the 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 emissions⁸
- 5) Manitoba Regulation 52/88 sets out the content for WHMIS training programs.

⁸ A “**fugitive emission**” means a gas, liquid, solid, vapour, fume, mist, fog or dust containing a controlled product that escapes from process equipment, emission control equipment, a product or a device in the workplace or from any facility which constitutes a workplace or part of a workplace.

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 safely handle them. 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 (OELs)?

Occupational Exposure Limits (OELs) 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.

Manitoba Regulation 53/88 provides information about how the OEL is set. The regulation refers to the American Conference of Governmental Industrial Hygienists Threshold Limit Values (ACGIH TLVs), as the source for setting OELs.

Although there are 5 types of limit values, the following two types of limit values 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 OELs. 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, personal assessment of exposure, etc) measures contaminants in the workplace. Monitoring can help assess the risks faced and the adequacy of hazard controls. The program must have a monitoring plan where:

- 1) Worker exposures may be more than one half of the OEL.
- 2) The work environment may not be safe because of:
 - lack of information about how badly the workplace is contaminated
 - fluctuations in concentrations of contaminants
 - variations in how often workers are exposed to contaminants, or
- 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 extended shifts and workweeks?

Eight-hour OELs may not protect workers on extended shifts (more than 8 hours a day) or extended workweeks (more than 40 hours). This is because a larger cumulative (total) dose is received over a shorter time. In these cases exposure should be limited to a proportion of each applicable OEL. The Brief and Scala method is often used to adjust an OEL to accommodate non-standard workshifts. $(\text{OEL}/\text{adj} = \text{OEL}_{8\text{hr}} \times 8\text{hrs}/\text{Actual Workshift} \times 24 - \text{Actual Workshift}/16)$.

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 or synergetic 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.

For more information, see the Section 19 of Manitoba Regulation 53/88.

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 implement 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:

- the substances involved
- conditions under which workers will be required or permitted to work
- the 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*?

This is covered in regulations 53/88. Your control plan must identify where these substances are used and provide adequate protection.

What are *designated materials*?

Other chemicals that have been identified as possible or probable causes of cancer in humans have been identified in Schedule B of the regulation 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 contaminated material must be disposed of
- 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 is 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 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 are unusually responsive to a substance, or who are pregnant, may require additional protection. If there is a substance present in a form and to an extent 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.

Summary

- You must have a plan to control chemical and biological hazards. These plans must carry out the duties set by *The Workplace Safety and Health Act and Regulations*.
- Your plan should address how appropriate information about hazards will be obtained and communicated to workers.
- Use standard hazard control techniques to identify, assess, and control these hazards.
- Use the resulting information to develop safe work procedures.
- Ensure workers receive adequate training about chemical and biological hazards in the workplace. They must know how to control the hazards they face and respond to emergencies.
- Assign clear responsibilities for setting up your plan and keep it working properly.
- Pay special attention to controlling the hazards from regulated substances. Ensure workers are not exposed to limits beyond listed OELs.
- Protect pregnant/nursing, hypersensitive, and unusually responsive workers. Provide alternate work when appropriate, if other controls are not effective.
- Provide your plan with good leadership and clear objectives.

Notes

Notes

Develop a plan to safeguard contracted employer(s) or self-employed person(s) at your workplace

- What are the criteria for selecting and evaluating employers and self-employed persons to be involved in work at your workplace?
- What is the procedure for monitoring other employers and self-employed persons at your workplace?

Introduction

Your safety and health program is your action plan to prevent injuries and occupational disease in your workplace. An important element of the program is the system of responsibility and accountability for controlling safety and health risks in your workplace.

Your prevention efforts can quickly be undone if you do not have a well thought out system for evaluating, selecting, and monitoring outside companies or self-employed persons with whom you contract to do certain jobs in 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 safeguard safety and health in the workplace when another employer or self-employed person is involved in work at the workplace that includes:

- criteria for evaluating and selecting employers and self- employed persons to be involved in work at the workplace, and*
- procedures for regularly monitoring employers and self-employed persons involved in work at the workplace.”*

When contracted employers or self-employed persons 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 persons that may create a hazard for your workers or others in the workplace
- hazards in your workplace that affect the workers of contracted employers’ or the self-employer person
- activities of one contracted employer or self-employed person that create hazards for other the workers of other contracted employers or self employed persons

If those hazards are not properly controlled, it is not only the contracted employer or self-employed person that is at risk of injury and loss; so is your organization. Care must be taken in the evaluation selection, and monitoring of contracted employers or self-employed persons, to ensure they make a positive contribution to your efforts to prevent workplace injuries and disease.

Contractors

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

This does not mean that you have to take over the safety and health responsibilities of the contracted employer or self-employed person, such as training, supervision or managing the safety and health hazards that fall under their control.

But it does mean that as a contractor you are responsible for managing the safety and health risks that fall under your control which includes implementing a system to ensure proper management of the safety and health risks associated with the work of contracted employers and self-employed persons. Under this system, the more you are involved in directing the activities of the contracted employers or self-employed persons, the more you are also involved in ensuring the safety and health risks are properly controlled.

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 persons. That system should include:

- Establishing safety and health criteria for evaluating and selecting contracted employers or self-employed persons. This criteria should include: evidence of good safety and health management (e.g. written safety and health program, WCB injury statistics, procedures to address unusual risks associated with the job, etc.) and 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.

- Establishing a system of information exchange in which you provide contracted employers and self-employed persons with information that they need to do the job safely, and they provide similar information to you and/or each other.

- Clarifying ‘who is responsible for what’ to effectively control safety and health hazards associated with the contracted job.
- Ensuring that relevant safety and health requirements of your organization, or their equivalent, are applied to contracted employers or self-employed persons at your workplace.
- Taking reasonable and practical steps to control health and safety hazards—over which you have control—that could affect the contracted employer or self-employed person.
- Monitoring contracted employers or self-employed persons to ensure they meet the safety and health requirements of the contract and taking 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 need to periodically monitor compliance with the safety and health requirements of the contract. If certain documents or reports are to be submitted periodically over the life of the contract, don’t wait until the contract is completed before checking to see if it was done. If you become aware that the contracted employers or self-employed persons are not meeting the safety and health requirements of the contract, you need to take action to make sure the problem is corrected.

Construction Projects

If you are undertaking a construction project which 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 construction 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 employer
- If you do not designate a prime contractor, you as project owner assume the responsibility of prime contractor

Summary:

- Include arrangements in your safety and health program to ensure the safety and health when contracted employers or self-employed persons are at your workplace.
- Establish safety and health criteria for evaluating and selecting contracted employers or self-employed persons.
- Establish a system of information exchange with contracted employers and self-employed persons.
- Clarify responsibilities to effectively control safety and health hazards associated with the contracted job.
- Ensure that relevant safety and health requirements of your organization are applied to contracted employers or self-employed persons.
- Provide for regular monitoring of the safety and health performance of the contracted employer or the self-employed person.
- Designate a prime contractor on a construction project which involves more than one employer or self-employed person.

Notes

Notes

Develop a training plan for workers and supervisors

- What is training?
- What must your training plan accomplish?
- Who should be trained?
- When should workers be trained?
- What training should workers receive?
- What training should supervisors receive?
- What training should subcontractors receive?
- What training should committee members receive?
- What training requirements are legislated?

Introduction

Effective training is essential to good safety and health. Remember, safety and health is about how your organization functions. It is about doing job right the first time.

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*. Your workplace safety and health 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. Maintain training records (for workers, supervisors, and committee members). Include the date of the training, participants, and a summary of the content.

What is training?

Training means more than providing information. 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 determine how safety and health training will be developed and delivered, and by whom. It must be designed to ensure safety and health education and training begins with worker orientation when a new worker starts with the organization or a worker is transferred to a different job. An orientation must cover any topic relevant to the safety and health of the worker including: emergency procedures, first aid facilities, any restricted areas, precautions required to protect workers from hazards, and any other safety and health procedures, plans, policies, and programs that apply to the worker.

Training is also needed when new equipment, processes, or procedures are introduced into the workplace, or 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 training on workers' duties and responsibilities as well as training on how to do specific work tasks.

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?

One of the duties of the committee is the development and promotion of programs for education and information concerning safety and health in the workplace. As you consult the committee in developing your safety and health program, this will be an area of particular interest to the committee.

The workplace safety and health committee:

- works with the employer on setting up the training plan
- helps the employer to 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

Do not 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 training is required under Section 4(4) of the *Workplace Safety and Health Act*.

Worker training should supplement any other training the worker has already received. Ensure that the worker is trained in the following areas:

- safe work practices and procedures
- how to identify and protect themselves from workplace hazards (i.e. safety, chemical, biological, ergonomic, etc.)
- fire and other emergency procedures
- the location of first aid facilities
- rules associated with prohibited or restricted areas, tools, and equipment
- the role of the worker within the workplace safety and health program
- the content of plans, policies, or programs required by the regulations, such as your workplace safety and health program, infectious material control plans, etc.
- the general requirements of the *Workplace Safety and Health Act* and regulations, such as worker's rights and responsibilities

- regulatory requirements applying to the worker’s job, such as lifting, WHMIS, respiratory protective devices, etc.

What training should supervisors receive?

A *supervisor* is an employee given authority over others. Section 4.1 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)(h) of the *Workplace Safety and Health Act* sets out general regulatory requirements for supervisory training.

Supervisors need all of the training given to workers, plus training to enable them to become competent.⁹ 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
- explain why each step in a safe work procedure must be followed

⁹ “Competent” means ...*possessing the knowledge, experience, and training to perform a specific duty.*

What training should contracted employers and self-employed persons, 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 for the purpose of attending 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
- the workplace hazardous materials information system (WHMIS)
- how to assess and review the safety and health program
- Manitoba workplace safety and health legislation
- where to go for safety and health information

Summary

- Your safety and health program needs a training plan to be effective.
- Training requires trainees to demonstrate they have acquired the knowledge or skills taught.
- Orient and train workers to work safely.
- Your training plan must build your safety and health program into jobs, work procedures, and production processes throughout the organization.
- Like other plans, it must have a mechanism to deliver the training, assign responsibilities, and monitor effectiveness.
- The committee assists the employer and audits the plan's effectiveness.
- Train everyone with duties under the legislation, and your program.

Notes

Notes

Develop a procedure to investigate incidents, dangerous occurrences, and refusals to work

- What should be in your incident investigation procedure?
- How can incidents be investigated?
- What should be in the procedure to investigate refusals to work?

Introduction

Investigations of incidents and dangerous occurrences provide valuable information needed to prevent recurrences.

Section 7.4(5)(I) of the *Workplace Safety and Health Act* requires...*a procedure for the investigation of accidents, dangerous occurrences and refusals to work pursuant to section 43 of the Act at the place of employment.*

An *accident* is any unplanned event that causes injury. A *dangerous occurrence* is any event that could have injured someone, but did not. Dangerous occurrences are often called ‘near misses’ or ‘near accidents’. We will use the term ‘**incident**’ to describe both accidents and dangerous occurrences.

A *refusal to work* is defined under section 43 of the Act as...*a worker may refuse to perform work at a workplace where he or she has reasonable grounds to believe and does believe that the particular work is dangerous to his or her safety or health, or the safety and health of another worker or any other person:*

- sufficient steps have been taken to satisfy the worker otherwise; or*
- the workplace safety and health committee has investigated the matter and advised the worker otherwise.*

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 and dangerous occurrences must fit your needs. They should state:

- the objective of your investigations (find and correct root causes)
- who investigates what incidents (if supervisors or safety and health co-ordinators investigate, the workplace safety and health committee must be kept informed)
- what training investigators and incident responders will receive
- who receives the written investigation reports
- who must fix the root causes found during an investigation
- who follows-up on corrective action and ensures it works
- what investigation reports and follow-up records will be kept
- who keeps what documents and records
- what summary and statistics reports are to be developed and how often these reports will be prepared

What should be investigated?

When an injury or illness is suffered by a worker or other person(s) in your workplace, which has resulted in a lost time accident, an investigation should be initiated to identify contributing factors and determine the corrective measures required to prevent recurrence.

Dangerous occurrences should also be investigated in a similar manner.

The investigation must be done as soon as is reasonably possible.

What else should be investigated?

Your procedure must also include investigations of potentially harmful exposures to any hazardous substances, including controlled products. Examples include exposures resulting from accumulations, spills, or leaks.

Your workplace safety and health program should also provide for the investigation of injuries, illnesses, and conditions that do not require hospitalization. Examples include chronic illnesses, musculoskeletal injuries, and exposures to infectious materials.

You should investigate any incident that hurts someone, or could hurt someone.

What incidents must be reported to the Division?

Manitoba Regulation 108/88R Section 8 requires the employer to notify the Workplace Safety and Health Division of serious **incidents** that resulted, or could have resulted, in:

- 1) death; or
- 2) fracture of a major bone; amputation; loss of sight; internal haemorrhage; third degree burns; unconsciousness resulting from concussion, electrical contact, asphyxiation; poisoning; cuts requiring hospitalization or time off work; any injury resulting in paralysis; any other injury likely to endanger life or cause permanent disability.

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. Here are some guidelines for conducting investigations.

The cause(s) of an incident can often be found by asking:

Who + What + Where + When + How

...for each key event in the incident. Separate facts from theory and opinion as much as possible. Look for underlying causes and avoid jumping to conclusions. Analyse the factors surrounding the incident. Use the following steps:

1) Analyse the incident factors

- Go through the incident, in stages. Ask “why” each event happened.
- Evaluate the role of every factor involved (people, materials, systems, weather, and so forth).
- Visit the scene. Review the physical evidence.
- Take photographs and make drawings. Interview witnesses and review documents.

2) Find the direct, indirect, and root causes

Direct – The direct cause(s) usually occurs immediately before the incident. For example, a direct cause might be a collapsing jack that dropped a car onto a worker.

Indirect – Indirect cause(s) set the stage for an incident and can include:

- lack of training and supervision
- inadequate tools, equipment, and materials
- departures from safe work procedures

Root – An incident may or may not have one ultimate “root” cause, such as an inadequate safety and health program. Root causes allow indirect and direct causes to develop. The workplace safety and health committee and employer should try to find if there were any symptoms before the incident. If so, why did the internal responsibility system fail to correct the problem?

3) Write a report recommending corrective action

Review what happened at each step in the incident. Prepare a report describing what happened. Use photos and drawings to illustrate key points.

Recommend corrective action, including both short and long-term controls, to prevent the same thing from happening again. Short-term controls should prevent a recurrence until longer-term controls can remove the root cause(s). File a copy of the report and post summaries for the information of workers.

The employer should take appropriate corrective action based on the report and inform the committee. The committee should audit the effectiveness of the corrective action.

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 any worker(s) asked to do the disputed job will be informed of their rights and duties
- who will take corrective action as a result of the investigation
- who will monitor the effectiveness of any corrective action taken to ensure it works

What is “dangerous” work?

Under section 43 of the *Workplace Safety and Health Act*, each employee has the right to refuse work that the worker has reasonable ground to believe constitutes a danger to his or her safety or health, or to the safety or health of another worker or person. “Dangerous” work could include:

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

Key points about the right to refuse include:

- Section 43 applies only to safety and health issues
- refusing to work is an individual decision (not a group decision)
- the refusal to work must be based on personal belief
- the personal belief must be based on *reasonable grounds* that the disputed work is *dangerous*

To determine if there are *reasonable grounds*, ask this question: “...would an average worker—with the same training and experience and using honest, professional judgement—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?

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.

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 (i.e. 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. Anyone involved in the investigation may contact the Workplace Safety and Health Division for help and advice. However, the committee must first try to resolve the matter internally.

The committee should take the following steps to investigate a refusal:

- 1) **Hold an emergency committee meeting** – If the refusing worker is not satisfied, have the full committee investigate. Hold an emergency committee meeting and vote on the refusal.
- 2) **Contact the Division** – If the refusing worker is not satisfied, then contact a Workplace Safety and Health Officer.
- 3) **Inform workers** – Inform employees about the investigation’s findings, or the Safety and Health Officer’s ruling.
- 4) **Decision/order may be appealed** - Anyone directly affected by the decision/order of the Safety and Health Officer may appeal the officer’s ruling to the Director of the Division. The officer’s decision stands unless an appeal overturns it.
- 5) **Monitor the effectiveness of corrective action** – The effectiveness of corrective action should be checked by the committee during inspections, conversations with workers, and other activities.

Summary

- You must have a procedure to investigate incidents and refusals to work.
- Identify what must be done and who must do it.
- You must investigate incidents and dangerous occurrences.
- You must investigate accidental exposures to substances.
- You should also investigate all lost time injuries, illnesses, and conditions.
- It is recommended that you investigate anything that hurts someone, or could hurt someone.
- There are many different incident investigation models. Select one that fits the needs of your workplace. Whatever model you use, make sure it helps you find the incident's root cause(s).
- Your procedure should have an effective mechanism to identify and resolve concerns before they escalate. The committee can be invaluable in helping the employer and workers talk about issues and find solutions.
- Your procedure to investigate refusals to work should follow the steps outlined in this chapter.

Notes

Develop a strategy to involve workers

- How can the strategy involve employees?
- How can the committee remain effective?
- What other strategies are available?

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. But most importantly, all employees must be involved in your efforts to prevent injuries and occupational diseases.

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

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 actively 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. Everyone must know:

- their role in the safety and health program
- their rights and responsibilities
- how to report/deal with concerns
- how to suggest improvements in the safety and health program

Like other strategies within your program, effectiveness depends on the commitment and leadership of the employer, senior management, and supervisors. Your program must also address how the workplace safety and health committee will be kept effective, including:

- training committee members
- enhancing communication between the committee, workers, and senior management
- responding promptly to problems or concerns raised by the committee
- considering the committee's recommendations during the development of plans, policies, programs, and procedures required by legislation

The employer is required to resolve the problem or address the concern raised by the workplace safety and health committee. If that cannot be done, the employer must give the committee a written reason for not resolving the problem or addressing the concern. The workplace safety and health committee should be the internal auditor of the workplace safety and health program, and should advise the employer on the strategy involving employee participation.

How can the strategy involve employees?

Workers' input and commitment to your safety and health program can be gained in part through:

- An effective workplace safety and health committee.
- Consultations directly between the employer and workers.
- Requiring and encouraging workers to report concerns and dealing with those concerns promptly.
- Encouraging workers to suggest how safety and health could be improved.
- Protecting workers from reprisals for raising concerns or making suggestions.
- Responding promptly to concerns and suggestions raised by workers, and keeping workers informed about the status of corrective action.

How can the committee be kept effective?

Your strategy must address how the committee will be kept effective, including:

- clarifying the role of the committee
- ensuring everyone knows how to support it
- ensuring the committee adequately represents shift workers and other groups with distinct concerns
- providing enough training, resources, and time for committee members to carry out their duties
- improving communication between the committee, workers, and the employer
- consulting with the committee (as required)
- helping the committee to carry out its duties effectively
- encouraging senior managers and influential workers to serve on the committee
- promptly acting on hazards and concerns reported by the committee
- promptly acting on the committee's recommendations
- regularly monitoring the committee's effectiveness

What other strategies can be used?

Your strategy on employee participation must fit the needs of your workplace, for example:

- building safety into the culture of the organization in the same way that client satisfaction, client care, quality, and product pride are built into the culture
- making safety and health part of everyone's job, from the chief executive to the newest worker
- requiring all managers and supervisors to set an example and accept no substitute for acceptable safety and health performance
- setting clear, crisp objectives and measurements for safety and health performance in the same way that objectives and measurements are set for other activities
- administering safety and health in the same way that production, quality control, client care, etc. are administered
- including safety and health performance in all regular employee (including managers and supervisors) performance reviews
- rewarding employees (including managers and supervisors) for safety and health performance in the same way they are for their other activities
- regularly including safety and health in messages from the employer and in organizational communications (newsletters, bulletins, posters, e-mail, etc.)

- regularly including safety and health in general meetings, management meetings, shop floor talks, and training
- regularly providing and explaining safety and health information relating to new materials, equipment, procedures, etc.
- recognizing groups and individuals for superior performance in the same way as they are recognized for superior performance in other areas
- requiring and encouraging workers to report concerns, and dealing with those concerns promptly

What about safety and health incentives?

Organizations committed to workplace safety and health encourage and reward excellent safety and health performance in the same way that excellence in other areas is encouraged and rewarded.

Summary

- Successful workplace safety and health programs have a strategy to involve employees and get their commitment.
- An effective workplace safety and health committee must be established.
- Workers must be directly consulted.
- Safety and health must be built into the culture of the organization and each job, and treated like any other activity.
- Safety and health incentives must be treated like incentives in other areas of the organization.

Notes

Regularly evaluate and revise your program

Introduction

You need to know if your safety and health program is working. You also require a procedure to keep your program current.

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 pose a risk to the safety and health of workers at the workplace.”

The evaluation process should ensure that the workplace safety and health program achieves its objectives and addresses new or emerging issues.

Elements should include:

- what methods will be used
- 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

At the minimum, the program must be reviewed and revised every three years. However, reviews and revisions of your program should occur on an ongoing basis and include:

- 1) Changes in the workplace that may affect health or safety (introduction of new technologies, production methods, or hazards). Review the program when you discover new hazards in the workplace.
- 2) Problems identified through inspections, concerns, audits, and investigations.
- 3) Better ways of doing the job are 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.

General questions to consider

- 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, adequately lit, and so forth?
- 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?

7.4(5) (a) Write a policy that demonstrates your commitment

- Is your policy written, communicated and posted?
- Was the committee involved in preparing the policy?
- Is the policy understood by everyone?
- Does the policy specify who is responsible and accountable for workplace safety and health duties?
- Have you allocated adequate resources to implement the policy?

7.4(5) (b) Identify and control hazards and emergencies

- Is the organization proactive in identifying hazards, assessing their risks, and putting controls in place?
- Has a job hazard analysis been done for each hazardous job?
- Are written safe work procedures and production processes in place?
- Does your organization promptly address concerns, and assign responsibilities for follow-up?
- Are workers informed about the risks of the hazards they face?
- Are hazard controls implemented (at the source, along the path, and at the worker)?
- Is the effectiveness of corrective action monitored?
- Are first aid logs kept?
- Are equipment logs in place?
- Are equipment and tool maintenance records kept?
- Are procedures, plans, programs, and policies required by the regulations in place and effectively monitored?
- Are suitable and adequate records and statistics kept?
- Are inspection and audit reports prepared and used effectively?

7.4(5) (c) Identify people and resources required to deal with emergencies

- Are emergencies identified?
- Are responsibilities and resources allocated?
- Are written emergency response procedures in place for every potential emergency (written fire safety procedures, and so forth)?
- Are written emergency procedures needed for chemical and biological hazards at the workplace?
- Are records of emergency training kept and used properly?

7.4(5) (d) Prepare a statement of responsibilities

- Are written duties and responsibilities for safety and health clearly written?
- Does everyone understand what is expected?
- Are systems in place to ensure accountability and compliance?
- Does accountability adequately reflect responsibility?
- Is a senior manager or supervisor in charge of implementing each safety and health program procedure throughout the organization?

7.4(5) (e) Schedule inspections

- Are inspection procedures and schedules in place?
- Does everyone understand who is responsible for what?
- Is adequate training provided?
- Are written report forms and checklists used effectively?
- Are inspection reports used effectively?

7.4(5) (f) Develop plans to control chemicals and biological hazards

- Is the inventory of chemicals and biohazards kept current?
- Is a control system in place for MSDS and other hazard identifiers?
- Are MSDS readily available to workers?
- Do workers understand the information on MSDS and product labels?
- Are workers trained properly?
- Are records of work environment monitoring needed?
- Are ventilation system maintenance records needed?
- Is a plan for controlling infectious substances required?

7.4(5) (g) Develop a procedure to safeguard contracted employer(s) or self-employed persons(s)

- Is there evidence that the other employer or self-employed person is in compliance with The *Workplace Safety and Health Act* and regulations?
- Does the other employer have a written workplace safety and health program in place, if required?
- Do workers of other employer(s) receive adequate orientation, instruction, training and competent supervision?
- Does the other employer(s) or self-employed person provide safe systems of work and working environments?
- Is there effective ongoing communication with the other employer(s) or self-employed person regarding hazards at the workplace and the measures to prevent and control them?
- Is there effective communication with the other employer(s) or self-employed person regarding hazards the other employer(s) or self-employed person may bring to the worksite?
- Do you have a system in place for the selection and evaluation of other employer(s) or self-employed person(s). Do you monitor the safety and health performance of the other employer(s) and their workers or self-employed persons on a regular basis?
- Are your organization's safety and health policies and procedures being followed by the other employer(s) and their workers or self-employed persons?

7.4(5) (h) Develop a training plan for workers and supervisors

- Are managers, supervisors, committee members, and workers adequately trained in their duties?
- Are training needs systematically analysed?
- Are clear responsibilities for training assigned?
- Is adequate time and resources provided?
- Are records of orientation, job, and WHMIS training in place?
- Are records of training required by the regulations in place (such as for forklift operations, respiratory protective equipment, etc)?
- Are records of crew talks kept?
- Are records kept of training provided to the workplace safety and health committee co-chairpersons and members?
- Are auditing reports on training kept and used?
- Are training requirements tracked to determine what training is needed and if training is being used as expected?
- Is the effectiveness of training evaluated and improvements made where necessary?
- Do managers, supervisors, and committee members observe behaviour to see if training is working?
- Is training checked during committee inspections and activities?

7.4(5) (i) Develop a procedure to investigate incidents, dangerous occurrences, and refusals to work

- Are responsibilities clearly assigned and put in writing?
- Are adequate training records kept?
- Are responsibilities for keeping records clear?
- Are written investigation procedures in place?
- Are written reports produced, kept, and used effectively?
- Does everyone know who is responsible for following-up on corrective action to ensure it is working?

7.4(5) (j) Develop a strategy to involve workers

- Are workers required and encouraged to report concerns and are those concerns dealt with effectively?
- Is there an effective workplace safety and health committee in place?
- Is the committee carrying out duties required by the regulations?
- Does the committee advise the employer on required policies, programs, and so on?
- Does the committee audit the internal responsibility system (IRS) effectively?
- Are senior managers and influential workers serving on the committee?
- Is the committee supported properly?
- Does the committee keep and use appropriate records (reports, minutes, recommendations, etc.)?
- Are employees regularly provided with information and asked for feedback?
- Are workers reporting hazards?
- Is senior management prepared to discuss concerns with workers during committee meetings, on the shop floor, in supervisory meetings, etc.?
- Are safety expectations discussed with new workers?
- Does the organization use a variety of technologies and tools to communicate with workers about safety and health?
- Are successes communicated with the same intensity as information about incidents and failures in the IRS?
- Are workers active in the workplace safety and health committee?

7.4(5) (k) Develop a procedure to regularly evaluate and revise your program

- Do you review your program and each program element within each three-year cycle required by Section 7.4(5)(k) of The *Workplace Safety and Health Act*?
- Are responsibilities for reviewing and evaluating the safety and health program clear?
- Is the committee effectively involved?
- Are the written procedures in the safety and health program actually working as they are supposed to?

Summary

- You must have a procedure to evaluate your safety and health program.
- You must evaluate your program completely every three years. Evaluate and revise your program procedures gradually over each three-year period.
- Additional reviews must be undertaken when there are changes in the workplace that may affect health or safety, or when problems develop.
- The workplace safety and health committee must be involved in evaluating and revising the program and each program element.
- Apply the same principles to evaluating and revising your safety and health program as you have to developing each program element.

Notes

