

**Department of Indian Affairs and Northern Development
Corporate Services
Departmental Audit and Evaluation Branch**

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**Audit of Occupational
Safety and Health**

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Executive Summary

Purpose

The purpose of this audit was to ensure that the Occupational Safety and Health (OSH) provisions of the Canada Labour Code (CLC), Part II and Treasury Board policies are being followed within headquarters and regions. Non-compliance in key areas could result in prosecution against managers and increased litigation costs for the department. Senior Management requested the audit to ensure that the department provides a safe and healthy work environment and is prepared for the upcoming legislation changes.

Background

It is the policy of the federal government to provide employees with a safety and healthy working environment. There are two key documents that govern safety and health activities in federal government departments, the Canada Labour Code Part II and its regulations, and the Treasury Board Manual on Occupational Safety and Health.

Legislative changes to the Canada Labour Code, Part II have been under development since the early 1990's. Impetus for the change came in part from the federal public sector where accident rates and related costs were considered inappropriately high in comparison to provincial jurisdictions. Under the proposed legislative changes:

- ▶ employers with more than 300 employees will be required to establish a National Policy Committee for health and safety;
- ▶ training would become mandatory for managers and safety and health committee members;
- ▶ employers would be required to establish prevention programs including a program for violence prevention;
- ▶ due diligence would be allowed as a defence and by inference would become an operational expectation; and,
- ▶ fines and penalties would be significantly increased.

Recent delays as a result of drafting the wording of the legislation have pushed the target date for bringing the changes to Parliament from 1998 to 2000. However, if the changes currently planned become legislation, the combination of these changes and the recent decentralization of compensation claims management to departments will necessitate a significant increase in the priority assigned to occupational safety and health within federal departments and agencies.

Methodology

The approach for this audit began with a preliminary questionnaire (see **Appendix A** for Questionnaire) which was completed by all regions and headquarters. Based upon those results and an initial examination of the systems in place for occupational safety and health, a checklist of key compliance areas was developed (see **Appendix B** for Compliance Checklist) along with an audit program to test management and operational practices. In each region visited and at headquarters walkabouts were conducted to verify compliance items and physically observe work place hazards and preventative measures.

Regional *Risk Scorecards*TM were developed based upon interviews with a sample of managers of potential significant risk areas (i.e. who have staff that travel) and non-significant risk areas. In addition, a sample of staff directly involved in perceived risk activities were also interviewed. In all cases, those interviewed were asked about “Existing Mitigating Measures” and then asked to plot the risk considering the existing measures. Interviewees were also asked about possible “Additional Mitigating Measures”.

Individual *Risk Scorecard*TM data was transferred onto a Summary *Risk Scorecard*TM. A region’s overall risk rating was derived from the clustering of individual assessments and from the assessment of the auditor based upon related audit data collected regarding accidents and existing control measures. The Summary and Overall *Risk Scorecards*TM were reviewed with the region and sectors during the audit debriefing. The Departmental *Risk Scorecard*TM on this subject was developed based upon the clustering of the overall regional risk ratings.

General Assessment

Overall, the departmental work environment is safe and healthy. The department’s incidence of injury rate was 1.27 per 100 employees. This was well below the 1996 average for the federal public services as a whole at 4.36 per 100 employees. It was comparable to the rate of the banking industry (0.65 per 100 employees).¹

The department’s good safety record reflects in part the administrative nature of much of its work and the contribution of many good OSH practices. However, in order for the department to be ready to meet the “due diligence” standard proposed for the legislative changes, there is a need to better focus existing OSH efforts. There is also a need to establish a new mechanism for addressing national issues such as communicating the priority for OSH and safety-related training.

¹ Occupational Injuries and their Cost in Canada: 1992 - 1996, Human Resources Development Canada, 1998.

Summary of Findings

The audit team observed many preventative measures such as regular vehicle maintenance, personal protective equipment and first aid training. However, OSH Committees mostly monitored safety-related issues (i.e. expiry dates on fire extinguishers) other than ones where there can be potential significant risk. It was found that regions in the South of Canada have a potential significant risk in the area of travel. In the North, there are more areas with potential significant risk, given their field/operational activities such as rock cutting, inspections, mapping and fire-fighting activities in the Yukon.

Management practices require strengthening to demonstrate due diligence and address national issues. Due diligence is a demanding standard which includes communicating a clear priority for OSH from senior management. The department's OSH policy includes a clear priority statement but it is not easy to access on the Human Resources Branch website. Also, there was no mechanism set up to manage department-wide OSH issues such as communicating priority. During the course of the audit, Human Resources Branch assign an experienced Staff Relations Officer and allocate 0.5 Full Time Equivalents to the Departmental Safety and Health Officer (DSHO) position to address the management practices and national issues.

The department was found to be compliant in most of ten (10) key compliance areas examined. However, compliance was generally not monitored on a regular basis by the committees. Regions visited were provided copies of the compliance checklist indicating compliance items requiring attention. The DSHO was provided copies of all the compliance checklists.

Considering both administrative tasks and the potential significant risk areas, it was concluded that the overall work environment is safe and healthy (with acceptable levels of risk). This overall rating is illustrated on the *Risk Scorecard™*. The North showed greater extent of potential significant risk areas, some of which were assessed as slightly over the Judgmental Boundary of Acceptable Risk. This in turn pushed the North's overall rating closer to the Judgmental Boundary of Acceptable Risk.

In one region, good records were being kept of vehicle accidents indicating eight (8) accidents in the past three (3) years. In seven (7) of the eight (8) accidents, the government driver (PWGSC Dedicated Unit employee or DIAND employee) was at fault or found to be in "minor neglect". The department's liability, if any, for an accident caused by a PWGSC driver using a DIAND vehicle had not been established.

The department has custodial real property assets that are used by employees, First Nation clients and/or the public. There was a lack of a national strategy to address departmental safety responsibilities such as maintaining life safety systems (i.e. fire alarms, sprinkler systems) for regions in the South of Canada.

Several best practices were found that can be shared department-wide.. However, there was little sharing of these best practices due to a lack of arrangements for coordinating national issues.

Recommendations

1. The ADM, Corporate Services should update the Departmental Occupational Safety and Health Policy to:
 - ▶ require that Occupational Safety and Health Committees include members from groups with potential significant risk areas. This would include groups who travel frequently and/or have potential significant risks as a result of operational and field activities; and,
 - ▶ clearly indicate that potential significant risk areas should be monitored regularly by managers and the Occupational Safety and Health Committee.
2. The ADM Corporate Services at Headquarters, and the Regional Directors General, should ensure members of OSH Committees are provided risk management training and OSH Committee Member training.
3. The Director, Administrative Services at Headquarters should follow up on the implications associated with PWGSC employees using departmental vehicles and communicate findings to senior management to take action in order to limit the department's liability.
4. The ADM, Corporate Services should ensure that:
 - ▶ a National OSH Policy Committee is established to work with the DSHO to facilitate and coordinate regional input on national issues and strengthen management practices on due diligence; and,
 - ▶ management practices are strengthened for due diligence by developing and implementing a plan for national OSH issues covering: communicating the priority; legislative changes; training of managers; monitoring and, reporting program results.
5. The ADM, Corporate Services and Regional Directors General should ensure:
 - ▶ compliance is monitored periodically according to risks and compliance rate history (annually as a minimum); and,
 - ▶ items of non-compliance found during the audit in regions visited are corrected.
6. The Departmental Occupational Safety and Health Officer should ensure that a compliance checklist (see Appendix B) is used by all regions.

7. The Departmental Occupational Safety and Health Officer should ensure the issue of OSH Committee Member training needs related to compliance is addressed as a national issue.
8. The ADM, Corporate Services should review safety responsibilities as it relates to real property assets and clearly communicate the requirements to responsible managers.
9. The Departmental Safety and Health Officer should initiate an annual process to identify and share best practices.

Background

It is the policy of the federal government to provide employees with a safety and healthy working environment. There are two key documents that govern safety and health activities in federal government departments, the Canada Labour Code (CLC) Part II and its regulations, and the Treasury Board Manual on Occupational Safety and Health (OSH).

All federal departments are responsible for ensuring that safety and health programs are established and address such areas as the formation of safety and health committees, accident prevention, first aid, and fire emergency. Unsafe and unhealthy working conditions effect not only the well-being of employees but also the efficiency of an organization.

Legislative changes to the Canada Labour Code, Part II have been under development since the early 1990's. Impetus for the change came in part from the federal public sector where accident rates and related costs were considered inappropriately high in comparison to provincial jurisdictions.

Under the proposed legislative changes:

- ▶ employers with more than 300 employees will be required to establish a National Policy Committee for health and safety;
- ▶ training would become mandatory for managers and safety and health committee members;
- ▶ employers would be required to establish prevention programs including a program for violence prevention;
- ▶ due diligence would be allowed as a defence and by inference would become an operational expectation; and,
- ▶ fines and penalties would be significantly increased.

Recent delays as a result of drafting the wording of the legislation have pushed the target date for bringing the changes to Parliament from 1998 to 2000. However, if the changes currently planned become legislation, the combination of these changes and the recent decentralization of compensation claims management to departments will necessitate a significant increase in the priority assigned to occupational safety and health within federal departments and agencies. For example, there will be increased potential for liability as due diligence is a more stringent standard. Also, departments and agencies will have to pay their own compensation costs if such exceeds their funding allocation.

Objectives

The objectives of this audit were to:

1. Determine whether employees are working in a safe and healthy environment;
2. Assess the extent of compliance with all central agencies, departmental OSH policies and directives and the CLC Part II;
3. Examine the framework, roles, responsibilities at headquarters and regions in areas related to OSH to ensure that the program is being managed economically, effectively and efficiently in light of the new responsibilities being delegated to the department;
4. Examine the framework for a sound management regime to show due diligence; and,
5. Identify and share best practices and lessons learnt related to OSH to prepare management for the future.

Scope

The scope of this audit included the OSH activities at headquarters and the Atlantic, Saskatchewan, British Columbia, Northwest Territories and Yukon Regions. In addition, other federal government departments such as Treasury Board and Human Resources Development Canada (HRDC) were contacted as part of the audit.

The audit focussed on the working environment of Department of Indian Affairs and Northern Development (DIAND) employees at departmental offices and in field work locations. Departmental safety and health responsibilities for custodial real property assets used by employees, First Nation clients and/or the public was not originally part of the audit's scope but was given a limited review because of its related nature and the exposure involved for the department.

Methodology

The approach for this audit began with a preliminary questionnaire (see **Appendix A** for Preliminary Questionnaire) which was completed by all regions and headquarters. Based upon those results and an initial examination of the systems in place for occupational safety and health, a checklist of key compliance areas was developed (see **Appendix B** for Compliance Checklist) along with an audit program to test management and operational practices. In each region visited and at headquarters, walkabouts were conducted to verify compliance items and physically observe work place hazards and preventative measures.

Regional *Risk Scorecards*[™] were developed based upon interviews with a sample of managers of potential significant risk areas (i.e. who have staff that travel) and non-significant risk areas. In addition, a sample of staff directly involved in perceived risk activities were also interviewed. In all cases, those interviewed were asked about “Existing Mitigating Measures” and then asked to plot the risk considering the existing measures. Interviewees were also asked about possible “Additional Mitigating Measures”.

Individual *Risk Scorecard*[™] data was transferred onto a Summary *Risk Scorecard*[™]. A region’s overall risk rating was derived from the clustering of individual assessments and from the assessment of the auditor based upon related audit data collected regarding accidents and existing control measures. The Summary and Overall *Risk Scorecards*[™] were reviewed with the region and sectors during the audit debriefing. The Departmental *Risk Scorecard*[™] on this subject was developed based upon the clustering of the overall regional risk ratings.

Findings and Recommendations

Safety and Health in the Work Environment

Overall, the departmental work environment is safe and healthy. However, it is important to note that there are some potential significant risk areas which require more attention from managers and OSH Committees.

For the purpose of this audit, a safe and healthy work environment was defined as one where there are minimal job hazards and/or the risk of injury or illness is mitigated to a sufficiently low enough level (in terms of likelihood and severity) to be within the Acceptable Level of Risk zone as a result of investments in preventative measures.

Most of the department's work involves administrative tasks including reviewing and analyzing client reports and data, processing payments, communicating, negotiating, administering trust accounts and natural resource records, developing policy, etc. These tasks are generally done within departmental offices located in buildings which have been built or modernized to current building codes. As such, there are few job hazard risks from the tasks themselves or from the work environment. Nonetheless, there are general disaster threats (e.g. fire, flooding, earthquakes, etc.), ergonomic issues and building-related hazards (such as those during renovations) that can be detrimental to employee health and safety. A number of "preventative measures" to mitigate the likelihood and severity of these threats and hazards were observed and include:

- ▶ experienced OSH Committee members;
- ▶ emergency plans in place;
- ▶ annual fire drills;
- ▶ first aid training; and,
- ▶ monitoring for housekeeping and air quality.

On the other hand, some departmental tasks are conducted outside of the administrative work areas and can represent higher hazards. Once identified, the audit team assessed these high hazard areas separately for regions in the **South** of Canada and regions in the **North**. The reason for this was due to the activities in the North posing greater potential risks and that the overall risk assessments would differ. The audit team intended to present the information in a manner that would be more meaningful for the overall results.

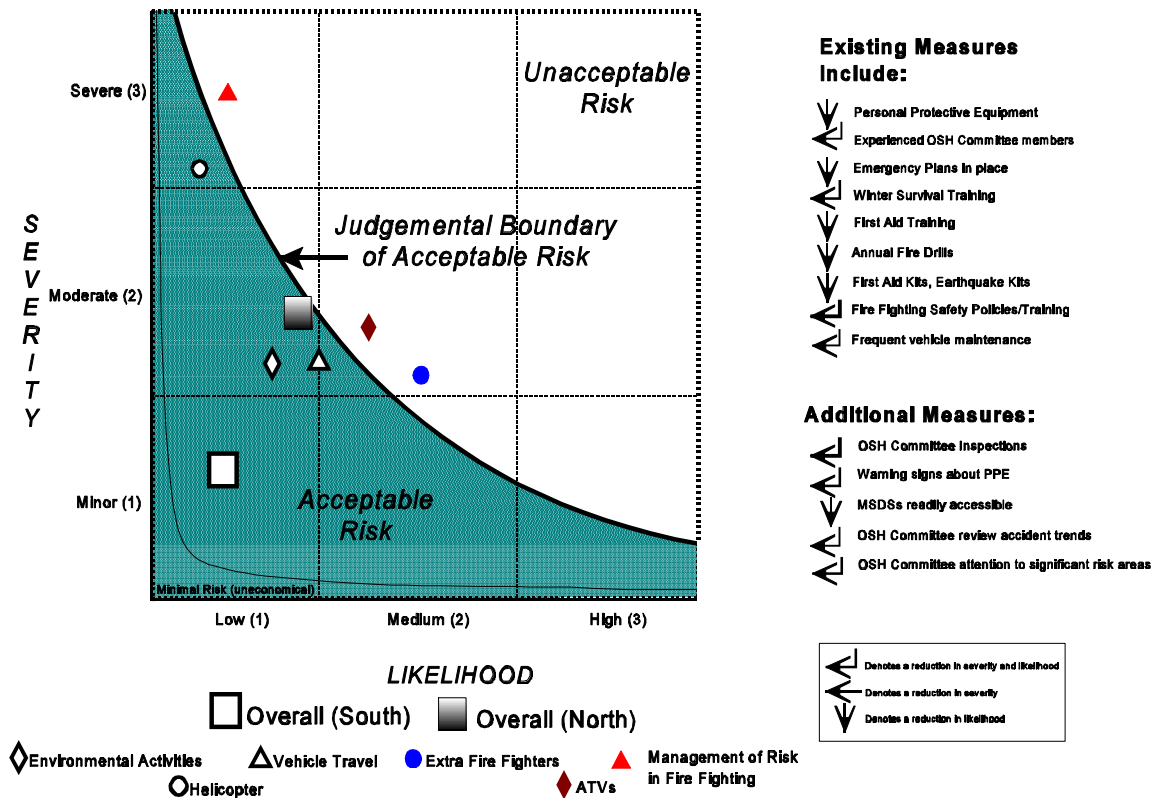
In the South, potential significant risks areas identified were travel and environmental activities. In the North many more potential significant risk areas were identified including travel, fire fighting, lab work, rock cutting, inspections and mapping.

Existing Measures were also in place in various locations to mitigate the potential of problems occurring in the identified potential risk areas. Measures included:

- ▶ Personal Protective Equipment (PPE) (boots, protective ear and eye gear, etc.);
- ▶ Winter Survival Training;
- ▶ Fire Fighting Safety Policies/Training; and,
- ▶ Frequent Vehicle Maintenance.

Occupational Safety & Health *Risk Scorecard™* – Departmental

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Considering both administrative tasks and the potential significant risk areas, it was concluded that the overall work environment is safe and healthy (with acceptable levels of risk). This overall rating is illustrated on the *Risk Scorecard*TM model on the previous page.

The North showed greater extent of potential significant risk areas, some of which were assessed as slightly over the Judgmental Boundary of Acceptable Risk. This in turn pushed the North's overall rating closer to the Judgmental Boundary of Acceptable Risk.

Significant Risk Areas: Fire-fighting Activities in the Yukon

The Yukon region is the only region with fire-fighting responsibilities. Firefighting is an activity which is included in devolution discussions with the Yukon government. However, until such time that a transfer takes place, it remains a departmental responsibility.

Fire fighting activities are an obvious potential significant risk area. Currently, there are extensive training and safety policies and practices for fire fighting activities. Even so, some fire fighting activities were assessed above the Judgmental Boundary of Acceptable Risk by fire fighting managers, namely:

- ▶ ***Extra Fire-Fighters (EFFs)***. EFFs are hired, often on short notice, as needs dictate and sometimes they have to receive their training on the job. In 1998, one of the most active fire fighting seasons, approximately 350 EFFs were needed, 275 of which had to have training on the job.

EFFs accounted for 80% (60 of 75) of the accidents (all minor) associated with fire fighting in 1998.

- ▶ ***ATVs*** are frequently used in an unsafe manner (e.g. without helmets, excessive speed) during fire fighting, according to the fire fighting managers interviewed.
- ▶ ***Management of Risk in Fighting Fires***. The fire fighting managers interviewed noted that fire-fighters have personal risk tolerances that cover the spectrum of low to high. Some with higher risk tolerances take chances that should not be taken. The issue of management of risk in fighting fires was an area meriting special training according to the managers interviewed.

The OSH Committee in the Yukon region should address as its first priority, lowering the risks associated with fire-fighting, given its high risk and profile. It is very important for the region to ensure it can meet the expectations of "due diligence" in these potential significant risk areas. Some work is already underway by the committee to examine the due diligence standard which is discussed in greater detail in the following section on OSH Management Practices.

Significant Risk Areas: Travel

Travel was identified as a potential significant risk area given that 500,000 - 1,000,000+ vehicle kilometres annually were being logged in regions that were visited. In addition, special modes of travel were being actively used including helicopters, All Terrain Vehicles (ATVs), canoes, boats and small charter aircraft.

In most cases there was awareness of the significance of the risks evidenced by frequent vehicle maintenance arrangements and the provision of personal protective equipment such as helmets for ATVs. However, in two regions, personal vehicles were frequently used for business travel by some staff. This was done without establishing whether their private vehicle insurance covered such business use or whether “supplementary business insurance” should be purchased and who should pay for such.

In one region, good records were being kept of vehicle accidents indicating eight (8) accidents in the past three (3) years. In seven (7) of the eight (8) accidents, the government driver (PWGSC Dedicated Unit employee or DIAND employee) was at fault or found to be in “minor neglect”. The department’s liability, if any, for an accident caused by a PWGSC driver using a DIAND vehicle had not been established.

In two regions where vehicles were frequently rented, accidents were being reported to the vehicle rental company and to the employee’s manager. However, documenting the details of accidents for rental vehicles were generally not maintained for safety analysis purposes (as was being done for vehicles owned by the department).

Departmental staff often travel in vehicles at night, when accidents are four (4) times more likely to occur.² Departmental staff also drive long distances which increases the likelihood of accidents³ and some drive at high speeds. (Speed is the number one driving infraction associated with fatal vehicle accidents)⁴.

Treasury Board policies on travel (Section 2.7.2) advises that “*in the interest of safe driving, when travellers driving vehicles are authorized, travellers should not normally be expected to drive more than:*

- a) 250 km after having worked a fully day;
- b) 350 km after having worked a half day; and,
- c) 500 km on any day when the traveller has not worked.”

² Taken from The Book of Risks, Larry Laudan, Wiley & Sons, 1994, p. 52.

³ Taken from True Odds: How Risk Affects Your Everyday Life, James Walsh, Merritt Publishing, 1996, p. 134.

⁴ Taken from The Book of Risks, Larry Laudan, Wiley & Sons, 1994, p. 47.

It was noted that only a few staff members were aware of this guideline and it had not been reviewed by OSH Committees relative to the operational requirements of their respective region.

Significant Risk Areas: Operational and Field Activities

The audit observed excellent practices to ensure a safe and healthy work environment for some operational and field activities. For example, the laboratory facility in the Northwest Territories was being inspected for OSH on a regular basis by Health Canada. Also, training programs were in place to prepare summer students on safety and health procedures before they participate in field projects such as geological surveys and mapping.

Some weak practices were also observed. These included:

- ▶ clutter in operational areas such as rock cutting facilities; and,
- ▶ lack of PPE for handling potentially hazardous waste.

Impact of Safety and Health Risks

The initial questionnaire (Appendix A) sent to all regions and headquarters by the audit team revealed that 47 injuries were reported between April 1997 and June 1998. This represents an “incidence of injury rate” of 1.27 per 100 employees over a fifteen month period. However, by excluding the Yukon Region, where fire-fighting services are provided, the rate would have been 0.7 per 100 employees. The department is well below the incidence of injury rate for the federal public service as a whole which was calculated by Human Resources Development Canada (HRDC) at 4.36 per 100 employees for 1996.⁵ Data on individual departments was not reported by HRDC but the department rate would be comparable to that of the banking industry which had an incidence of injury rate of 0.65 per 100 employees in 1996.⁵



Personal Protective Equipment (PPE), worn by employees in one of the regions visited.

While the department’s recent incidence of injury rate is comparatively low, the likelihood of

⁵ Occupational Injuries and Their Cost in Canada: 1992-1996, Human Resource Development Canada, 1998.

impacts for significant risk areas is higher than the overall rating as illustrated on the *Risk Scorecard™*. Impacts of significant risk areas include death, injury, cost of compensation, loss of work days, etc. Under the “due diligence” standard, regions may not be able to demonstrate that they were adequately addressing potential significant risk areas.

The OSH Committees in regions visited were generally not reviewing potential significant risk areas and outcomes (i.e. accident information). Committee members that were interviewed attribute this to an absence of committee members from workgroups with potential significant risk areas, a need for risk training as well as training as committee members.

Additional focus on potential significant risk areas on a periodic basis by the OSH Committee and managers will allow regions to monitor whether they are fully comfortable with the level of risk they are maintaining given their investment in preventative measures. Their analysis would determine whether they are optimizing their risk/benefit position. If work patterns change, the optimal risk position may be achieved with an adjusted set of preventative measures.

Recommendations

1. *The ADM, Corporate Services should update the Departmental Occupational Safety and Health Policy to:*
 - < *require that Occupational Safety and Health Committees include members from groups with potential significant risk areas. This would include groups who travel frequently and/or have potential significant risks as a result of operational and field activities; and,*
 - < *clearly indicate that potential significant risk areas should be monitored regularly by managers and the Occupational Safety and Health Committee.*
2. *The ADM Corporate Services at Headquarters, and the Regional Directors General, should ensure members of OSH Committees are provided risk management training and OSH Committee Member training.*
3. *The Director, Administrative Services at Headquarters should follow up on the implications associated with PWGSC employees using departmental vehicles and communicate findings to senior management to take action to limit the department’s liability.*

OSH Management Practices

Management practices require strengthening to demonstrate due diligence and address national issues.

Management practices involve the framework of policies and plans which establish priority and commitment, organizational arrangements and training for development and implementation, and monitoring of overall program results.

Anticipated changes to the CLC include increases in fines and penalties with the provision of allowing the defence of “due diligence” for most of the sections under which changes can be laid. Demonstrating due diligence is a demanding standard and starts with attention to management practices.

The concept of due diligence is a familiar one used in provincial safety legislation and environmental laws. Demonstrating due diligence involves evidence that:

- ▶ Codes and requirements are understood;
- ▶ Every reasonable precaution is taken; and,
- ▶ Arrangements in place ensure precautions are implemented.

The department may not be able to meet the due diligence standard based on existing management practices. For example, management practices that exhibit due diligence include communicating a clear priority for OSH from senior management. It was observed that the OSH section of the Human Resource Manual includes the statement that “*The Department of Indian Affairs and Northern Development recognizes the safety and health of their employees comes first. Management is committed to doing everything possible to prevent injuries and to maintain a healthy work environment*”. This statement communicates a clear priority for OSH but it has not been well communicated throughout the department. Although the department’s OSH Policy is on the HRB website, it is difficult to access. Furthermore, an OSH booklet printed a few years ago includes the statement “*The prevention of accidents and the provision of a safe and healthy work environment are matters of major importance in this department*”. However, few of these booklets were evident in the regions visited.

Besides the department’s OSH Policy and promotional materials, there were few practices established to manage OSH on a department-wide basis. For example, while most managers have had an orientation on their responsibilities for OSH, it has not been determined whether they know all they need to know about codes and requirements for due diligence purposes. In addition, it was also noted that managers in general, and OSH Committee members specifically, had awareness of changes being planned for the CLC. Some had attended presentations from sources such as Health Canada. However, little information on upcoming changes had been

provided by headquarters. Overall, managers and staff interviewed had only a minimal knowledge of intended changes. Plans in order to prepare for the forthcoming changes have not yet started at headquarters or in the regions.

Direction, Coordination and Communication of OSH

While it is important to keep a focus on OSH issues at the operational level, there are issues such as communicating the priority, organizing an efficient response to upcoming legislative changes, training and summarizing overall program results that require central coordination.

The lack of department-wide program implementation is attributed to the absence of a National OSH Committee and to the minimal resources assigned to OSH national issues within Human Resource Branch at Headquarters as a result of organizational changes over the past few years.

The department's Occupational Safety and Health Policy establishes the roles and responsibilities of the Departmental Safety and Health Officer (DSHO) as being "*responsible for administering the departmental OSH program... and providing advice and guidance to regions regarding the application of the CLC and various OSH standards*". During the course of the audit, Human Resource Branch clarified that the DSHO responsibility would be assigned to an experienced staff relations officer and allocate 0.5 Full Time Equivalents (FTEs) to work with the regions in establishing a plan to address national OSH issues.

Without sufficient resources to plan and take action, and a national forum to provide regional input and facilitate coordination, it may not be possible to demonstrate that due diligence is department-wide.

Recommendation

4. *The ADM, Corporate Services should ensure that:*
 - < *a National OSH Policy Committee is established to work with the DSHO to facilitate and coordinate regional input on national issues and strengthen management practices on due diligence; and,*
 - < *management practices are strengthened for due diligence by developing and implementing a plan for national OSH issues covering: communicating the priority; legislative changes; training of managers; monitoring and, reporting program results.*

Compliance

Compliance was observed in most key areas examined but will require attention in others.

Compliance was assessed according to the OSH requirements of ten (10) key areas from the Canada Labour Code (CLC), Part II, the CLC Regulations and Treasury Board policies and directives. The detailed compliance (Appendix B) checklist was prepared indicating the specific authorities that were tested by physical observation (walkabouts) and examination of documentation

Detailed compliance checklists were completed for multiple locations in several regions. Regions were provided with the completed checklists as was the DSHO in Human Resources Branch at headquarters.

The department was found to be, for the most part, compliant. Key areas of compliance were:

- ▶ OSH Committees established and records kept;
- ▶ Accidents recorded and documentation kept;
- ▶ Emergency Evacuation Plans in place;
- ▶ Annual fire drills conducted; and,
- ▶ Employee Assistance Programs established.

However, there were also some compliance items requiring additional attention in various locations visited. These included:

- ▶ Posting the CLC and the names of the OSH Committee members;
- ▶ Fully establishing an OSH Committee;
- ▶ Regular OSH Committee meetings;
- ▶ Material Safety Data Sheets (MSDSs) readily accessible;
- ▶ First aid training; and,
- ▶ Well stocked first aid kits on hand (in offices and vehicles).

Occupational safety and health legislation, regulations, policies and directives provide the foundation for safe and healthy work environments. Overall, OSH program effectiveness is restricted without a sound knowledge of compliance requirements and consistent compliance monitoring.

Recommendations

5. *The ADM, Corporate Services and Regional Directors General should ensure:*
 - < *compliance is monitored periodically according to risks and compliance rate history (annually as a minimum); and,*
 - < *items of non-compliance found during the audit in regions visited are corrected.*
6. *The Departmental Occupational Safety and Health Officer should ensure that a compliance checklist (see Appendix B) is used by all regions.*
7. *The Departmental Occupational Safety and Health Officer should ensure the issue of OSH Committee Member training needs related to compliance is addressed as a national issue.*

Safety Responsibility for Custodial Real Property Assets

There is a lack of a national strategy to address safety responsibilities for custodial real property assets in southern regions.

Safety responsibilities for custodial real property assets was not part of the original scope of the audit. However, it was given limited review during regional visits because safety and departmental exposure is involved.

Departmental occupational safety and health responsibilities extend to custodial real property assets when such are occupied by departmental employees. In addition, there are overall safety responsibilities for items such as life safety systems for custodial real property assets occupied by First Nations people or that have public access.

The department has custodial safety and health responsibilities for several significant real property assets including:

- ▶ 15 federal schools;
- ▶ St. Mary's Complex (a hospital and other related facilities);
- ▶ warehouses; and,
- ▶ a laboratory.

Some of these real property assets are occupied with departmental employees, some are occupied by First Nations people, and some have public access. The auditors conducted only a limited review to ascertain how the department's safety responsibilities as custodian are addressed.

In the North, there was awareness of custodial safety responsibilities and there were plans and actions evident to indicate the department's responsibilities were being addressed. However, in the South, there were no actions evident and there appeared to be no national strategy for custodial real property assets, most of which were in transition for transfer to First Nations.

The department is at risk if key safety features such as life safety systems are not maintained according to required codes.

Recommendation

8. *The ADM, Corporate Services should review safety responsibilities as it relates to real property assets and clearly communicate the requirements to responsible managers.*

Best Practices

Many best practices were observed but there is little sharing of best practices.

Best practices are items that would assist in the efficiency and effectiveness of implementing OSH at headquarters and in the regions. The criteria for best practices was that the initiative was not limited to a particular region but could be used across the country. Each region visited provided at least one best practice. Examples include:

- ▶ OSH website;
- ▶ Accident Summary Worksheets;
- ▶ Regular walkabout inspections; and,
- ▶ Stress in the Workplace seminars.

However, there was little sharing of these best practices because of a lack of arrangements for coordinating national issues. The strengthening of the position of Departmental Safety and Health Officer can be used to address the sharing of best practices.

Recommendation

9. *The Departmental Safety and Health Officer should initiate an annual process to identify and share best practices.*

Terms of Reference

Terms of Reference

Audit of DIAND Occupational Safety and Health (OSH)

Background: It is the policy of the government to provide employees with a safe and healthy working environment and with occupational health services as defined in Treasury Board's Occupational Safety and Health policy. There are two key documents that govern safety and health activities in federal government departments: the Canada Labour Code, Part II and regulations; and the Treasury Board Manual on OSH.

Through provisions of the *Financial Administration Act*, the Public Service of Canada is subject to the Canada Labour Code, Part II and the pursuant Canada Occupational Safety and Health Regulations. The purpose of the legislation is to prevent accidents and injury to health arising out of, linked with or occurring in the course of employment. Human Resources Development Canada (HRDC) is responsible for enforcing the legislation.

In cases where unsafe or unhealthy operations or working conditions exist, HRDC is authorized to obtain assurance from the department of voluntary compliance on corrective measures to be taken. In the case of serious or persistent infractions, HRDC safety officials can issue directions and may, finally, initiate prosecutions

Individual employees are responsible for learning and following the OSH provisions of the workplace; use OSH equipment and devices provided; take reasonable precautions to protect themselves and other employees; comply with authorized OSH instructions; and report all accidents and hazards.

Need: The department has a responsibility under the Canada Labour Code to ensure that employees are working in a safe and healthy environment. There is a need to ensure that the occupational health and safety provisions of the Canada Labour Code, Part II and Treasury Board policies on occupational health and safety are followed within the department. Non-compliance by the department with safety and health regulations could result in prosecution. Treasury Board is currently reviewing its procedures on how workers compensation costs are funded. It is expected that the changes to funding are intended to make departments more accountable for their worker compensation costs. It is necessary to determine the current health and safety environment and identify where improvements are needed. The need for an Audit of Occupational Health and Safety was identified and approved by the Departmental Audit and Evaluation Committee (DAEC) as part of the Departmental Audit and Evaluation Branch (DAEB) 1997-1998 Plan.

Scope: The audit will include an examination of the systems and procedures in place for the operation of the occupational safety and health program throughout the department. The audit will consider systems and procedures in place for monitoring departmental compliance with Treasury Board's Occupational Safety and Health standards and regulations pursuant to Part II of the Canada Labour Code.

Issues: The purpose of this audit will be to assess the extent of compliance with applicable occupational safety and health policies and directives. The main objective of the audit will be to verify whether the department is fulfilling its responsibility under the Canada Labour Code to ensure that employees are working in a safe and healthy environment. The audit will also examine the role of the Occupational Safety and Health Committee. More specifically, whether:

- the department has implemented a occupational safety and health program in accordance with applicable standards;
- the department has procedures in place for investigating and reporting work related accidents;
- the department has processes and procedures in place to identify, deal with and resolve potential health and safety issues;
- employees are aware of their occupational safety and health responsibilities; and
- identify where improvements are needed in the working environment in terms of the relevant occupational safety and health standards.

Approach: Treasury Board's Occupational Safety and Health Handbook will be used throughout the audit. The approach for this audit will adhere to DAEB's standards for conducting audits. The planning phase will focus on describing the systems in place for carrying out the occupational safety and health program as well as further defining the issues warranting further examination in the fieldwork phase. The audit will take place at headquarters, Atlantic, Saskatchewan and B.C. regions.

Resources: The audit will be performed using both DAEB and contracted resources. Overall management of the audit will be the responsibility of DAEB.

Cost: It is estimated that the contracted resources will cost \$70,000.

Time Frame: The audit will begin in mid-November 1997. A final report should be issued in July 1998.

Approved:

Brent DiBartolo
Assistant Deputy Minister
Corporate Services
October 3, 1997

Action Plan

PROJECT TITLE / TITRE DU PROJET :

Audit of Occupational Safety and Health

REGION OR BRANCH / RÉGION OU DIRECTION GÉNÉRALE :

Headquarters - Corporate Services

(1) RECOMMENDATIONS / RECOMMANDATIONS	(2) REPORT / RAPPORT PAGE NO.	(3) ACTION PLAN / PLAN D'ACTION (If space provided is insufficient please continue on blank sheet. / Si vous manquez d'espace, veuillez continuer sur une page blanche.)	(4) RESPONSIBLE MANAGER / GESTIONNAIRE RESPONSABLE (TITLE / TITRE)	(5) PLANNED COMPLETION DATE / DATE PRÉVUE DE MISE EN ŒUVRE
<p>1. The ADM, Corporate Services should update the Departmental Occupational Safety and Health Policy to:</p> <ul style="list-style-type: none"> ▶ require that Occupational Safety and Health Committees include members from groups with potential significant risk areas. This would include groups who travel frequently and/or have potential significant risks as a result of operational and field activities; and, ▶ clearly indicate that potential significant risk areas should be monitored regularly by managers and the Occupational Safety and Health Committee. 	<p>P. 9</p>	<p>The Occupational Safety and Health directive Chapter 6-1 to clarify potential significant risk.</p> <p>Regional Directors General will be requested to review their Occupational Health and Safety membership to ensure potential significant risk areas are represented.</p> <p>Draft a departmental directive to set out the responsibilities and structure for Occupational Health and Safety Committees.</p>	<p>ADM, Corporate Services</p>	<p>July 30, 1999</p> <p>September 30, 1999</p> <p>September 30, 1999</p>
<p>2. The ADM Corporate Services at Headquarters, and the Regional Directors General, should ensure members of OSH Committees are provided risk management training and OSH Committee Member training.</p>	<p>P. 9</p>	<p>A letter will be issued to OSH committees with copies to ADM, Corporate Services and the RDGs reflecting on these Audit recommendations and requesting that all OSH committee members have training in risk management and committee membership.</p> <p>OSH training to be given to the National OSH committee</p>	<p>ADM, Corporate Services</p>	<p>September 30, 1999</p> <p>November 30, 1999</p>
<p>3. The Director, Administrative Services at Headquarters should follow up on the implications associated with PWGSC employees using departmental vehicles and communicate findings to senior management to take action in order to limit the department's liability.</p>	<p>P. 9</p>	<p>To amend departmental policy on motor vehicles to clarify this issue and communicate the policy to regional management.</p>	<p>Director, Administrative Services</p>	<p>June 1999</p>

PROJECT TITLE / TITRE DU PROJET :

Audit of Occupational Safety and Health

REGION OR BRANCH / RÉGION OU DIRECTION GÉNÉRALE :

Headquarters - Corporate Services

(1) RECOMMENDATIONS / RECOMMANDATIONS	(2) REPORT / RAPPORT PAGE NO.	(3) ACTION PLAN / PLAN D'ACTION (If space provided is insufficient please continue on blank sheet. / Si vous manquez d'espace, veuillez continuer sur une page blanche.)	(4) RESPONSIBLE MANAGER / GESTIONNAIRE RESPONSABLE (TITLE / TITRE)	(5) PLANNED COMPLETION DATE / DATE PRÉVUE DE MISE EN ŒUVRE
<p>4. The ADM, Corporate Services should ensure that:</p> <ul style="list-style-type: none"> ▶ a National OSH Policy Committee is established to work with the Departmental Safety and Health Officer to facilitate and coordinate regional input on national issues and strengthen management practices on due diligence; and, ▶ management practices are strengthened for due diligence by developing and implementing a plan for national OSH issues covering: communicating the priority; legislative changes; training of managers; monitoring and, reporting program results. 	<p>P. 11</p>	<p>At the National Union Management Consultation meeting on February 9, 1999, it was agreed that the HR-UMC Sub-committee is to be the National OSH Policy committee. This was reaffirmed by the HR-UMC Sub-committee on May 29, 1999.</p> <p>The DSHO is to draft a plan for national OSH issues for presentation at next HR-UMC Sub-committee meeting.</p>	<p>ADM, Corporate Services</p>	<p>May 29, 1999</p> <p>November 30, 1999</p>
<p>5. The ADM, Corporate Services and Regional Directors General should ensure:</p> <ul style="list-style-type: none"> ▶ compliance is monitored periodically according to risks and compliance rate history (annually as a minimum); and, ▶ items of non-compliance found during the audit in regions visited are corrected. 	<p>P. 13</p>	<p>Monitor compliance twice a year.</p> <p>Visit the 5 remaining regions and verify compliance.</p> <p>Verify action plan/completion dates.</p>	<p>ADM, Corporate Services and Regional Directors General</p>	<p>Sept 99/March 2000</p> <p>December 31, 1999</p> <p>ongoing/report to the national cttee (November1999)</p>
<p>6. The Departmental Occupational Safety and Health Officer should ensure that a compliance checklist (see Appendix B) is used by all regions.</p>	<p>P. 13</p>	<p>Send a letter to regions on the use of the compliance checklist.</p> <p>A letter to be sent to all regional OSH committees requesting that they ensure the compliance checklist is put to good use.</p>	<p>Departmental Occupational Safety and Health Officer</p>	<p>September 30, 1999</p>
<p>7. The Departmental Occupational Safety and Health Officer should ensure the issue of OSH Committee member training needs related to compliance is addressed as a national issue.</p>	<p>P. 13</p>	<p>This will be included in the letter mentioned in recommendation 2.</p>	<p>Departmental Occupational Safety and Health Officer</p>	<p>September 30, 1999</p>

PROJECT TITLE / TITRE DU PROJET :

Audit of Occupational Safety and Health

REGION OR BRANCH / RÉGION OU DIRECTION GÉNÉRALE :

Headquarters - Corporate Services

(1) RECOMMENDATIONS / RECOMMANDATIONS	(2) REPORT / RAPPORT PAGE NO.	(3) ACTION PLAN / PLAN D'ACTION (If space provided is insufficient please continue on blank sheet. / Si vous manquez d'espace, veuillez continuer sur une page blanche.)	(4) RESPONSIBLE MANAGER / GESTIONNAIRE RESPONSABLE (TITLE / TITRE)	(5) PLANNED COMPLETION DATE / DATE PRÉVUE DE MISE EN OEUVRE
8. The ADM, Corporate Services should review safety responsibilities as it relates to real property assets and clearly communicate the requirements to responsible managers.	P. 14	Determine life safety responsibilities with respect to custodial real property assets and communicate these to regional managers.	ADM, Corporate Services	November 1999
9. The Departmental Safety and Health Officer should initiate an annual process to identify and share best practices.	P. 15	A letter will be sent to OSH committees asking for their best practices. These practices will be consolidated into one document and distributed to all committees and posted on the Intranet.	Departmental Occupational Safety and Health Officer	March 31, 2000

PROJECT TITLE / TITRE DU PROJET :

Audit of Occupational Safety and Health

REGION OR BRANCH / RÉGION OU DIRECTION GÉNÉRALE :

Atlantic Region

(1) RECOMMENDATIONS / RECOMMANDATIONS	(2) REPORT / RAPPORT PAGE NO.	(3) ACTION PLAN / PLAN D'ACTION (If space provided is insufficient please continue on blank sheet. / Si vous manquez d'espace, veuillez continuer sur une page blanche.)	(4) RESPONSIBLE MANAGER / GESTIONNAIRE RESPONSABLE (TITLE / TITRE)	(5) PLANNED COMPLETION DATE / DATE PRÉVUE DE MISE EN OEUVRE
<p>5. The ADM, Corporate Services and Regional Directors General should ensure:</p> <ul style="list-style-type: none"> ▶ compliance is monitored periodically according to risks and compliance rate history (annually as a minimum); and, ▶ items of non-compliance found during the audit in regions visited are corrected. 	<p>P. 13</p>	<p>Compliance will be monitored by the expanded committee on an ongoing basis (Quarterly)</p> <p>The three items have been reviewed. Two have been completed and the third, hazardous travel, will be completed within the next two months.</p>	<p>ADM, Corporate Services and Regional Directors General</p>	<p>April 1, 1999</p> <p>June 1, 1999</p>

PROJECT TITLE / TITRE DU PROJET :

Audit of Occupational Safety and Health

REGION OR BRANCH / RÉGION OU DIRECTION GÉNÉRALE :

British Columbia Region

(1) RECOMMENDATIONS / RECOMMANDATIONS	(2) REPORT / RAPPORT PAGE NO.	(3) ACTION PLAN / PLAN D'ACTION (If space provided is insufficient please continue on blank sheet. / Si vous manquez d'espace, veuillez continuer sur une page blanche.)	(4) RESPONSIBLE MANAGER / GESTIONNAIRE RESPONSABLE (TITLE / TITRE)	(5) PLANNED COMPLETION DATE / DATE PRÉVUE DE MISE EN OEUVRE
<p>5. The ADM, Corporate Services and Regional Directors General should ensure:</p> <ul style="list-style-type: none"> ▶ compliance is monitored periodically according to risks and compliance rate history (annually as a minimum); and, ▶ items of non-compliance found during the audit in regions visited are corrected. 	<p>P. 13</p>	<p>Further to the recommendation in the report, the compliance checklist will become a standing agenda item at our regularly scheduled Health and Safety Committee meetings and any compliance issues will be identified and recorded in the minutes for follow-up.</p> <p>Also, during the regional visit some concerns were raised regarding the reporting of accidents involving motor vehicles. We have reviewed our procedures and advised our managers of their responsibility to ensure that all accidents are investigated and properly recorded.</p>	<p>ADM, Corporate Services and Regional Directors General</p>	<p>April 1, 1999</p> <p>April 1, 1999</p>

PROJECT TITLE / TITRE DU PROJET :

Audit of Occupational Safety and Health

REGION OR BRANCH / RÉGION OU DIRECTION GÉNÉRALE :

Northwest Territories Region

(1) RECOMMENDATIONS / RECOMMANDATIONS	(2) REPORT / RAPPORT PAGE NO.	(3) ACTION PLAN / PLAN D'ACTION (If space provided is insufficient please continue on blank sheet. / Si vous manquez d'espace, veuillez continuer sur une page blanche.)	(4) RESPONSIBLE MANAGER / GESTIONNAIRE RESPONSABLE (TITLE / TITRE)	(5) PLANNED COMPLETION DATE / DATE PRÉVUE DE MISE EN OEUVRE
<p>5. The ADM, Corporate Services and Regional Directors should ensure:</p> <ul style="list-style-type: none"> • compliance is monitored periodically according to risks and compliance rate history (annually as a minimum); and, • items of non-compliance found during the audit in regions visited are corrected. <p>6. The Departmental Occupational Safety and Health Officer should ensure that a compliance checklist (see Appendix B) is used by all regions.</p> <p>7. The Departmental Occupational Safety Officer should ensure the issue of OSH Committee Member training needs related to compliance is addressed as a national issue.</p>	<p>P. 13</p> <p>P. 13</p> <p>P. 13</p>	<p>The Northwest Territories has an INAC Occupational Safety and Health committee in place and periodic monitoring for compliance is a joint effort amongst the staff involved in the committee, assigned floor wardens and management. This monitoring annually is being done on a quarterly basis. Such items monitored are First Aid/CPR training for wardens, inspections of first aid kits, regular monthly meetings by the OSH Committee, etc.</p> <p>The Regional INAC OSH Committee will contact the Departmental Occupational Safety and Health Officer for more information on Regional OSH compliance issues and the check list provided in order to adopt it regionally. The checklist will be assessed and implemented.</p> <p>This region's OSH Committee members held 3 information sessions in March 1999 which were arranged by the Human Resources Training Officer. To date there have been no official training in OSH related activities for our committee members. I fully support local members attending OSH training courses, including compliance related courses, available to them. It has been planned that the OSH Committee members will receive this training within the next six months.</p>	<p>ADM, Corporate Services and Regional Directors General.</p>	<p>April 29, 1999.</p> <p>Sept. 30, 1999</p> <p>Dec. 31, 1999</p>

PROJECT TITLE / TITRE DU PROJET :

Audit of Occupational Safety and Health

REGION OR BRANCH / RÉGION OU DIRECTION GÉNÉRALE :

Saskatchewan Region

(1) RECOMMENDATIONS / RECOMMANDATIONS	(2) REPORT / RAPPORT PAGE NO.	(3) ACTION PLAN / PLAN D'ACTION (If space provided is insufficient please continue on blank sheet. / Si vous manquez d'espace, veuillez continuer sur une page blanche.)	(4) RESPONSIBLE MANAGER / GESTIONNAIRE RESPONSABLE (TITLE / TITRE)	(5) PLANNED COMPLETION DATE / DATE PRÉVUE DE MISE EN OEUVRE
<p>5. The ADM, Corporate Services and Regional Directors General should ensure:</p> <ul style="list-style-type: none"> ▶ compliance is monitored periodically according to risks and compliance rate history (annually as a minimum); and, ▶ items of non-compliance found during the audit in regions visited are corrected. 	<p>P. 13</p>	<p>Regional Occupational Health & Safety Meetings will be held and minutes will be posted on the Intranet Regional Home Page</p> <p>Material Safety Data Sheets will be posted at each photocopy machine</p> <p>Accident reporting procedures will be forwarded to all employees</p> <p>Emergency Plan Training will be provided to all employees and management on a regular basis. This will include First Aid and CPR, Winter Survival, Defensive Driving and for OSH Committee members to learn of their responsibilities. There will also be information provided on dealing with bomb threats.</p> <p>Survival kit & fire extinguisher expiry date will be added to the semi-annual checklist for safety gear.</p> <p>Renovations of the building have been completed and the major egresses will be checked to ensure they comply with safety standards.</p> <p>Delivery of EAP Services is being reviewed</p>	<p>ADM, Corporate Services and Regional Directors General</p> <p>Project Engineer, PIPS, Manager Administration</p> <p>Manager, Administration</p> <p>Manager, Human Resources</p> <p>Manager, Administration</p> <p>Manager, Administration</p> <p>Manager, Administration</p> <p>Manager, Administration</p> <p>Manager, Administration</p> <p>Director, Corporate Services</p>	<p>April 1, 1999</p> <p>April 30, 1999</p> <p>May 30, 1999</p> <p>September, 1999</p> <p>April 30, 1999</p> <p>March 31, 1999</p> <p>September, 1999</p> <p>September 30, 1999</p>

Appendix A
Preliminary Questionnaire

Preliminary Survey Questionnaire

The purpose of this survey is to get a national overview of DIAND's Occupational Health and Safety. This survey is for the Audit of Occupational Health and Safety which is in the planning phase. It does not mean that your region will be included in the fieldwork phase of the audit but data collected could be part of the overall report and best practices identified will be shared. Information will be kept confidential and non-compliance will not be identified on a regional basis. For regions with district offices, districts will also be expected to respond to this survey. Please reply by June 12, 1998.

General

1. Who is involved in safety and health in the region?
 - how many committees / representatives are there?
 - name of committee co-chairs
 - name of committee members / representatives
 - name of employees with delegated responsibility
2. Are there any region specific policies and procedures for H&S?

Accident Investigation and Reporting

3. How many accident investigation reports have been completed since April 1997?
4. What are the prevalent sources of accidents and health issues in the region?
5. Is there an initiative to transfer and process compensation claims in the region?

OSH Committees

6. How many OS&H committee meetings have taken place since April 1997?
7. Are there minutes for these meetings?

Training

8. What training has been given on OS&H to Committee members, management and staff since April 1997?

Workplace Hazardous Management Information System (WHMIS)

9. Is WHMIS training part of staff orientation?
10. Is there any site specific implementation of WHMIS in the region i.e. Material Safety data Sheets (MSDSs) on hand?

Workplace Inspections

11. Do managers or committees conduct workplace inspections?

Other

12. Do you think health and safety activities and priorities in the region are commensurate with compliance requirements and local hazards and risks?
13. Are there any safety and health related issues / risks of note or concern the audit team should consider?
14. Are there any other issues you would like to raise at this time?

Appendix B

Compliance Checklist

Key Compliance Areas

Key Compliance Areas for: _____

Key Compliance Areas		Compliance Reference	
1.	Posting of CLC	CLC, Section 125(d)	
2.	Safety Committees <ul style="list-style-type: none"> ▶ Establish Committee ▶ Establish Representative ▶ Posting Names of Members ▶ Keeping Records ▶ Regular Meetings ▶ Monitoring Safety Programs ▶ Annual Report 	CLC, Section 135(1) CLC, Section 136(1) CLC, Section 135(5), 136(3) CLC, Section 135(7) CLC, Section 135(8) CLC, Section 135(6)(g) SHCRR, Section 10	
3.	Accident Investigation & Reporting <ul style="list-style-type: none"> ▶ Duty of Employer ▶ Records ▶ Annual Report 	CLC, Section 125(c) CLC, Part XV, Section 15.6 (1) CLC, Part XV, Section 15.1(1)	
4.	First Aid <ul style="list-style-type: none"> ▶ Training ▶ Posting of Information ▶ Field Operations ▶ First Aid Stations, Supplies 	CLCR, Part XVI, Section 16.3(1) CLCR, Part XVI, Section 16.6(1) TB Directive, Chapters 2-5, Section 4 CLCR, Part XVI, Section 16.5(1), 16(1)	
5.	Safe Occupancy of the Work Place <ul style="list-style-type: none"> ▶ Emergency Evacuation Plan ▶ Annual Fire Drill 	CLCR, Part XVII, Section 17.4(1) CLCR, Part XVII, Section 17.1(1)	
6.	Motor Vehicle Operations <ul style="list-style-type: none"> ▶ Servicing and Inspection ▶ First Aid Kits 	TB Directive, Chapters 2-11, Section 16 TB Directive, Chapter 2-11, Section 34	
7.	Use and Occupancy of Buildings <ul style="list-style-type: none"> ▶ Environmental Condition ▶ Housekeeping 	TB Directive, Chapter 2-17, Section 17.3 TB Directive, Chapter 2-17, Section 17.13.1	
8.	Employee Assistance Program	TB Policy, Chapter 1-2	
9.	MSDS	CLCR, Part 10, Section 10.27(a)	
10.	Health Evaluations	TB Directive, Chapter 2-13, Section 5	
Legend: <ul style="list-style-type: none"> CLC – Canada Labour Code Part II CLCR – Regulations to the CLC TB – Treasury Board SHCRR – Safety and Health Committee and Representative Regulations 			