

# Elements of an Occupational Health and Safety Program

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## Introduction

An occupational health and safety program is a definite plan of action, designed for each specific workplace, to prevent accidents and occupational disease.

An occupational health and safety program is an important health and safety tool. Effective occupational health and safety programs have been proven to reduce accidents and illnesses in the workplace. Therefore, employers in moderate to high hazard workplaces are required by *The Occupational Health and Safety Act, 1993* to establish and maintain an occupational health and safety program in accordance with *The Occupational Health and Safety Regulations, 1996*.

The purpose of an occupational health and safety program is to prevent accidents and occupational disease in a specific workplace. To do so effectively, the occupational health and safety program may need to go beyond the legislated requirements set out in the Act and regulations. The Act and regulations simply set out the minimum requirements on a wide variety of health and safety issues, without reference to their implementation within each workplace.

In contrast, an occupational health and safety program sets out the requirements and procedures needed in each workplace to prevent accidents and occupational illness.

The Occupational Health and Safety Division has two publications about occupational health and safety programs. This publication, *Elements of An Occupational Health and Safety Program*, is the first (Part I). It will help employers set up a program as required by Section 13 of the Act and Regulation 22.

The second (Part II) is called *Setting up an Occupational Health and Safety Program: A Guide*. It outlines how to put a program in place and deal with related issues, such as return to work plans.

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### ***A note about terms***

When we use the term ‘Act,’ we mean *The Occupational Health and Safety Act, 1993*.

Whenever we use the term ‘regulations,’ we mean *The Occupational Health and Safety Regulations, 1996*.

Whenever we use the term ‘committee,’ we mean an *occupational health committee* required by the Act and regulations.

Whenever we use the term ‘Division,’ we mean the Occupational Health and Safety Division of Saskatchewan Labour.

## What workplaces must have a program?

Every employer would benefit from implementing an effective occupational health and safety program. But, the Act and regulations say employers in moderate to high-hazard industries with ten or more workers must implement a program. See the Appendix of this publication for a list of affected 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 accidents may differ from one workplace to another. That is why the health and safety program needs to be workplace-specific. A program developed for one workplace may not meet the needs of another.
- 2 To be effective, an occupational health and safety 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 occupational health and safety program needs worker involvement. It must be developed in consultation with your occupational health committee.<sup>1</sup> But, more than that, all employees need to be involved in health and safety activities if your occupational health and safety program is going to be effective.
- 4 Everyone must be held accountable for carrying out his or her responsibilities for making the health and safety program succeed. Senior management must be accountable for developing and

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<sup>1</sup> The Division interprets “**consult**” to mean that, while not obliged to obtain the approval or permission of the occupational 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** and/or make recommendations on the possible options and alternatives
- **To be considered.** This means the employer will consider the recommendations of the committee and where applicable, give the committee credible reasons for not accepting or implementing the committee’s recommendations

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implementing the program. Individual supervisors and employees should be assigned responsibility for carrying out specific elements of the program. The health and safety program should then be assessed in the same way as any other important program in the organisation.

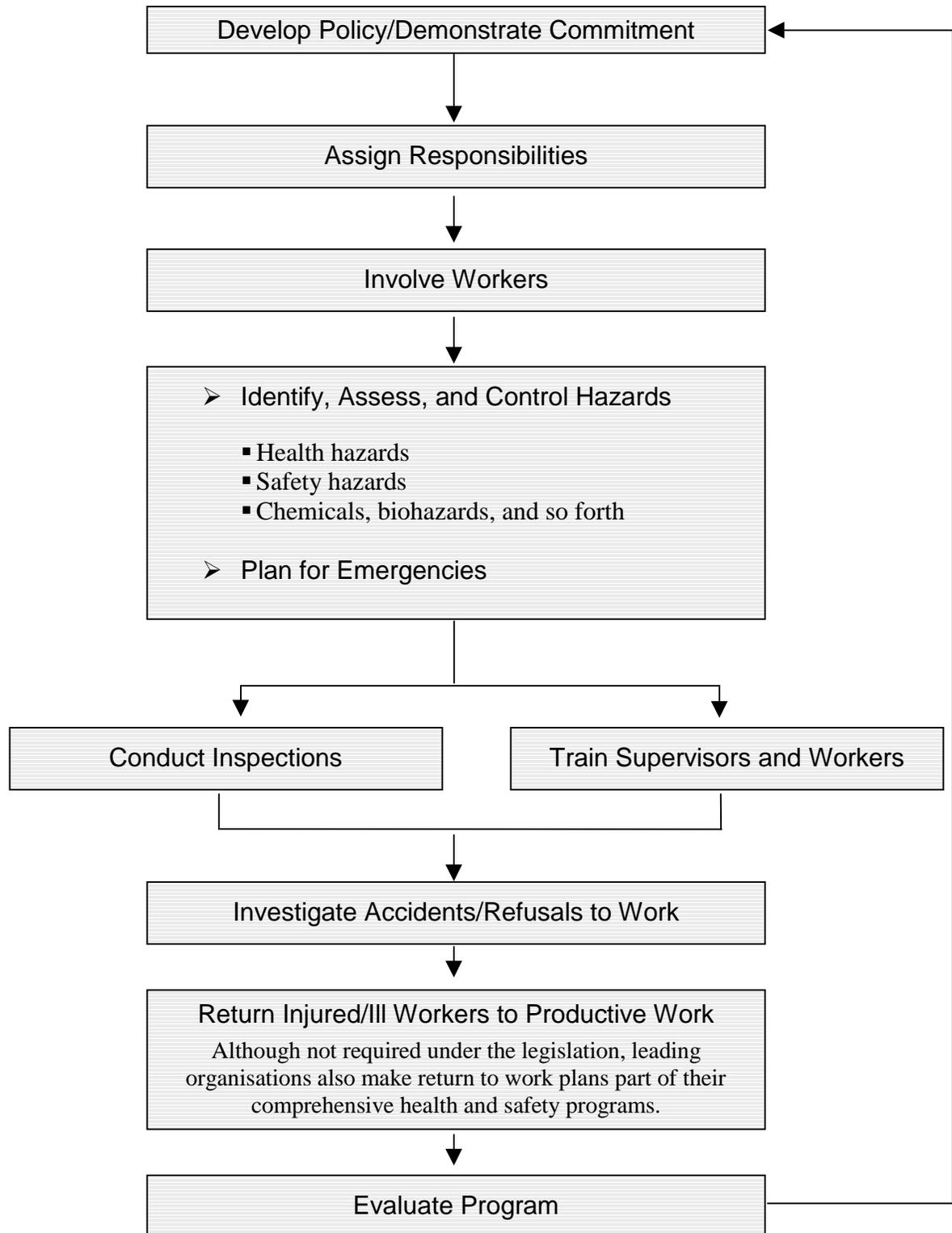
- 5 Each of the program's elements must be in writing. Elements must be supported with all documents and information addressing matters listed in the regulations. If elements of the health and safety program have been implemented in separate procedures and policies, then those procedures and policies must be referred to in the main health and safety program document.
- 6 The program must also address the health and safety of subcontractors and their workers. In situations where you have contracted two or more outside organisations or self-employed people to do work, you are responsible for co-ordinating the health and safety programs of all employers at that place of employment.<sup>2</sup>
- 7 The program must be effectively communicated to all employees. It must be available to your occupational health committee, workers, or to an occupational health officer (on request).
- 8 Setting up a program is not simply about producing documents. A health and safety 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

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<sup>2</sup> A **“contractor”** means a person who, or a partnership or group of people that, pursuant to one or more contracts, directs the activities of one or more employers or self-employed people involved in work at a place of employment.

A **“subcontractor”** is not defined in the legislation. In this publication, it means the employer or self-employed person hired to work under contract.

## How is a program developed?



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*What steps should be taken to implement your program?*

- 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 health and safety (who is responsible for what).
- 5** Schedule regular and 'surprise' planned inspections.
- 6** Develop plans to control chemical and biological hazards.
- 7** Develop training plans for workers and supervisors.
- 8** Develop a procedure to investigate accidents, dangerous occurrences, and refusals to work.
- 9** Develop ways to involve workers in the program.
- 10** Regularly evaluate and revise your program.

*Return-to-work plans*

While not required by Regulation 22, you should have a plan to return injured workers to productive jobs within the workplace.

## Write a policy that demonstrates commitment

Regulation 22 (a) requires...*a statement of the employer's policy with respect to the protection and maintenance of the health and safety of the workers.*

An occupational health and safety policy is a statement of principles and general guidelines that govern your health and safety actions. It tells workers, suppliers, subcontractors, self-employed people, and clients about the organisation's commitment to health and safety. It should include:

### Musts

Is your policy statement:

- ✓ Written, communicated, and posted?
- ✓ Understood by workers and others who may be affected?
- ✓ Clear about who is responsible and accountable?
- ✓ Followed in all work activities and areas?

- the health and safety philosophy of the organisation
- management's commitment to prevent accidents and occupational illnesses
- the objectives of the health and safety program
- who is responsible and accountable for elements of the program
- the responsibility of employees and others for health and safety
- a statement that substandard health and safety performance will not be accepted

The policy statement must be made known to all employees and, where appropriate, to suppliers, subcontractors, and clients. New hires must be made aware of the policy statement during orientation. The policy must not take a back seat to any other policy in your organisation. It must be kept up-to-date, and it must be followed in all work activities. The most senior manager in the organisation should also sign it.

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## Identify and control hazards and emergencies

### Musts

- ✓ Is your risk management system proactive? Does it anticipate risks?
- ✓ Does your system specify how to do jobs and tasks safely? For example, have you used a job safety analysis process?
- ✓ Have safe work procedures been developed?
- ✓ Does your system include a mechanism to inform workers about hazards, their risks, and hazard controls?
- ✓ Does your system assign responsibilities for each element in the program to specific people?
- ✓ Does your system include plans, policies, procedures, and programs required by the regulations?
- ✓ Does your system include plans for identifying and dealing with emergencies?

Regulation 22 (b) requires...*the identification of existing and potential risks to the health or safety of workers at the place of employment and the measures, including procedures to respond to an emergency, that will be taken to reduce, eliminate or control those risks.*

One of the most important elements of an occupational health and safety program is an effective system to identify and control hazards. Hazards may cause accidents, injuries, and illnesses. The employer may not be able to anticipate and prevent every accident, 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 accidents can be attributed to hazards and risks that people in the workplace have come to consider routine or unimportant.

Clause (b) of Regulation 22 requires a system to:

- 1 Identify known and potential workplace hazards. The system must enable and encourage workers to bring forward concerns about hazards.
- 2 Assess the associated risks.
- 3 Implement measures to eliminate or control the hazards.

Risks include:

- Safety hazards
- Health hazards such as:
  - chemical, biological, and physical agents
  - work design (ergonomic hazards)
  - stressors such as harassment, violence, shift work, and working alone or at isolated worksites

The risk management system need 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 efforts.

Workers are a valuable source of information about hazards and risks in the workplace. The occupational health committee provides input and advice, and audits the system's effectiveness.

***What process must be used to review hazards?***

- 1** Consider these factors and items when reviewing workplace hazards:
  - information from workers, past accidents, and near accidents
  - accidents in similar workplaces
  - Workers' Compensation Board claims
  - workers' health and safety concerns
  - occupational health committee minutes
  - new or modified jobs
  - new equipment or work processes
  - the possibility of exposure to hazardous substances and agents
  - product literature and information from suppliers
  - new scientific information about risk of illness from working with substances at work
- 2** Consider the hazards associated with tasks, equipment, and material. Conduct a job safety analysis (or a similar assessment) for all hazardous jobs.
- 3** Require and encourage workers to promptly report health and safety concerns. This is a proactive way of preventing accidents. 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 report concerns
  - requires supervisors to promptly correct concerns and document what was done

Leading organisations evaluate employee health and safety performance in the same way they evaluate performance in other areas.
- 4** You can also conduct informal interviews with workers to get information on accidents or near accidents that affect them, or that they witnessed or heard about.

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*What process must be used to assess the risk?*

The next step is to determine the nature of the risk associated with each hazard. Find out:

- 1 Is there a risk of permanent disability?
- 2 Is there a risk of temporary disabling injury?
- 3 Is there a risk of minor disabling injury?
- 4 Then estimate the level of risk:
  - How often and for how long are workers exposed to each hazard?
  - How common are workplace accidents associated with each hazard?

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 must hazards be controlled?*

How you control a hazard will depend on the circumstances. You must consider the seriousness of the risk and what controls are reasonable and practical in the circumstances (in the Act, this is called *reasonably practicable*).<sup>3</sup> The regulations may provide guidance in the minimum standards to be met. You should also consider best practices recommended by your industry.

Hazard control must follow three steps:

- 1** Eliminate hazards posed by equipment, materials or work processes at the source. You may redesign the work process, substitute a safer chemical for a hazardous chemical, or buy new equipment. These methods are often the best ways of controlling hazards.
- 2** If it is not reasonable and practical to eliminate hazards, use engineering or other controls. Machine guards and noise enclosures are examples.
- 3** If it is still not reasonable and practical to reduce the risks through these methods, protect the workers through personal protective equipment, training, supervision, and so forth.

The person(s) responsible for risk assessment and control should be prepared to explain to workers, management, and an occupational health officer the extent of the risk associated with a hazard and the effectiveness of the chosen control(s).

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<sup>3</sup> **“Practicable”** means possible given current knowledge, technology and invention. **“Reasonably practicable”** means practicable unless the person on whom a duty is placed can show that there is a gross disproportion between the benefit of the duty and the cost, in time, trouble and money, of the measures to secure the duty.

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### ***How must information be communicated to workers?***

If any of this is going to prevent accidents, 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 Making sure anyone at risk or anyone responsible for ensuring the safety of others understands the risks and how they can be controlled.
- 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 health and safety education right away by orientating new workers and workers transferred to new jobs. Make sure workers receive additional training when new equipment or procedures are implemented and when there is inadequate safety performance.
- 5 Requiring subcontractors to implement safe work procedures and educate their workers.

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

### ***What emergencies must procedures address?***

You must have procedures to address predictable emergencies, such as fires, pipeline breaks, safety device failures, leaks, and releases of hazardous agents. Start by making a list of possible emergencies:

- 1 Consider the possible major consequences of each potential emergency.
- 2 Determine the best response to each emergency (rescue, evacuation, decontamination, fire fighting, and so forth).
- 3 Make a list of resources required to respond to each emergency, such as first aid and medical supplies, rescue equipment, emergency response training, and so forth.
- 4 Then implement the necessary emergency response plans.

## Identify people and resources required to deal with emergencies

Regulation 22 (c) requires...*the identification of internal and external resources, including personnel and equipment that may be required to respond to an emergency.*

### Musts

- ✓ Has your program identified situations that could produce emergencies?
- ✓ Has your program identified human and other resources required to deal with emergencies?
- ✓ Has your program developed a written fire safety plan and a plan to deal with chemical spills (where needed)?
- ✓ Has your program identified emergency training requirements?

- 1 The program must address response plans for fires, explosions, major releases of hazardous agents, and other possible emergencies at the place of employment.
- 2 The program must identify situations that will trigger emergency response actions – such as declaring an emergency, evacuating workers, calling in internal and external resources, initiating rescues, and tending to casualties.
- 3 The program must identify who is designated to carry out the emergency plans, state their duties and responsibilities, and identify the training they need to be competent.
- 4 The program must identify resources. These resources include the personnel and equipment needed to deal with each emergency situation. Consider the location of the place of employment, existing resources, and the nature of each emergency.
- 5 The program must include a fire safety plan. See Regulation 360 for more information.
- 6 The program must include emergency procedures to deal with an accumulation, spill, or leak of hazardous chemical or biological substances. See Regulation 310 for more information.

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## Prepare a statement of responsibilities

Regulation 22 (d) requires...*a statement of the responsibilities of the employer, the supervisors, and the workers.*

### Musts

- ✓ Are assignments as specific as possible and in writing?
- ✓ Are assignments accompanied by a monitoring system (checks)?
- ✓ Does it state what consequences follow when health and safety duties are not carried out?

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

Your health and safety program needs to spell out individual responsibility for health and safety. See sections 3 and 4 of the Act and regulations 12, 13, and 17 for minimum responsibilities of employers, supervisors, and workers.

Senior management is responsible for developing and implementing the program. A senior manager, committed to the success of the health and safety program, should be made responsible for developing and overseeing implementation of the program. Responsibility (and accountability) for carrying out each program element must also be assigned to specific supervisors or other employees.

State who is responsible for what actions as clearly and as specifically as possible. For example, the program should identify who is authorised to order safety equipment, require machine maintenance, or mobilise resources to ensure that the task is done safely.

Remember, in order to carry out their responsibilities, people must:

- know what their responsibilities are
- have the necessary authority to carry them out
- have the necessary skill, training, and experience to carry them out

***What are the responsibilities of employers and senior managers?***

Employers and senior managers have responsibilities under the legislation that include:

- providing a safe and healthy workplace
- ensuring that legal health and safety requirements are met
- establishing and maintaining an effective health and safety program and obtaining input from the 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 health and safety requirements
- managing the health and safety performance of their managers and supervisors
- making sure workers have the information, training, certification, supervision, and experience to do their jobs safely
- making sure medical/first aid facilities are provided as needed
- setting up effective occupational health committees and ensuring that workers have the means to allow them to participate effectively in health and safety discussions
- co-operating with other parties in dealing with health and safety issues

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### *What are the responsibilities of managers and supervisors?*

Managers and supervisors have responsibilities under the legislation that include:

- understanding and ensuring compliance with workplace health and safety requirements
- co-operating with the occupational health committee, helping it to do its job properly, and ensuring all employees support committee members in their health and safety activities
- making sure hazards are identified and proper steps are taken to control the risks
- inspecting work areas and correcting unsafe acts and conditions
- instructing and coaching workers to follow safe work procedures
- ensuring only authorised, competent workers operate equipment
- ensuring equipment is properly maintained
- ensuring the necessary personal protective equipment is provided to workers and used properly
- knowing how to safely handle, store, produce, and dispose of chemical and biological substances at the workplace
- understanding and implementing emergency procedures
- reporting and investigating accidents and near accidents
- promoting health and safety awareness
- co-operating with other parties in dealing with health and safety issues

### ***What are the responsibilities of workers?***

The responsibilities of workers include:

- understanding and following legislation and workplace health and safety 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 occupational health committee and others on health and safety issues

### ***What is the role of the occupational 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 organisation's 'big picture' to provide input and advice on health and safety matters. The committee should also monitor the workplace safety system (for example, as determined by the health and safety program) to ensure that it is working properly. The committee provides input and advice. The employer remains ultimately accountable for the final decision.

Use the committee to audit the effectiveness of the occupational health and safety program.

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## Schedule inspections

Regulation 22 (e) requires...*a schedule for the regular inspection of the place of employment and of work processes and procedures.*

### Musts

- ✓ Does your schedule identify what will be inspected, (work areas, equipment, tools, procedures, practices, and so forth), by whom, and how frequently?
- ✓ Does it include inspections of work procedures and production processes?
- ✓ Does it state what inspection records must be produced to ensure accountability?
- ✓ Does it provide for correcting defects found during each inspection?
- ✓ Does it state what training is required for those who carry out inspections?

Inspections are one of the most common and effective tools for identifying and correcting problems before they cause accidents. Inspections should also be used to draw attention to and encourage good health and safety practices. That is why Regulation 22 (e) requires your health and safety program to include...*a schedule for the regular inspection of the place of employment and of work processes and procedures.*

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

**Informal inspections** – These really boil down to conscious awareness of health and safety 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. In any workplace, day to day activities create health and safety hazards. People, equipment, materials, and the environment constantly change. Some environmental changes remove hazards, others create new ones. Inspections help focus attention on change and help solve problems before they cause accidents. Formal inspections must include an inspection of work processes and procedures to ensure the adequacy of safe work procedures.

This section deals with planned inspections.

Regulation 23 requires the employer to arrange for regular examinations of any *plant* under the control of the employer.<sup>4</sup> Regulation 28 requires the employer to enable the occupational health committee to inspect the place of employment at reasonable intervals.

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

When an occupational 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 for not resolving the problem or addressing the concern.

The Division recommends that your committee inspect the workplace before each regularly scheduled meeting.

Regulation 23 Inspections	Regulation 28 Inspections
Inspections by: <ul style="list-style-type: none"> <li>• managers, supervisors, workers, operators, and maintenance personnel</li> <li>• health &amp; safety co-ordinators</li> <li>• employers and owners</li> </ul>	Inspections by the occupational health committee

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<sup>4</sup> Section 2(1) (x) of the Act defines “**plant**” as including any... premises, site, land, mine, water, structure, fixture or equipment employed or used in the carrying out of an occupation.

“**Equipment**” means any mechanical or non-mechanical article or device, and includes any machine, tool, appliance, apparatus, implement, service or utility, but does not include the personal property owned by an individual unless that property is used in the carrying out of an occupation.

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### ***Who is responsible for what within the inspection schedule?***

Workers, operators, supervisors, maintenance personnel, safety professionals, and others can carry out Regulation 23 inspections. Some inspections are best carried out by someone with specialised 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 inspection.

Your occupational health and safety 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 process, and work procedures. Inspections need to be done often enough to find problems before they cause accidents.

Some kinds of inspections need to be more frequent than other inspections.

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.

## Develop plans to control chemicals and biohazards

Regulation 22 (f) requires...*a plan for the control of any biological or chemical substance handled, used, stored, produced or disposed of at the place of employment and, where appropriate, the monitoring of the work environment.*

If you have chemical or biological substances in the workplace, you need to make sure they are properly controlled. Hazard information about biological and chemical substances must be obtained and used to set up adequate controls. Controls should include worker instruction and workplace monitoring. The plan must meet the requirements of parts XXI and XXII, and Section 85 of the regulations.

Parts XXI and XXII require the employer to:

- 1 Maintain an inventory of chemical and biological substances that may harm workers when handled, used, stored, produced or disposed of at the place of employment.
- 2 Obtain hazard information on these substances.
- 3 Reduce workplace contamination and prevent exposure to any extent that could be harmful.
- 4 Use the information to develop and implement safe work procedures and processes.
- 5 Use the information to train workers about hazards and how to use required work procedures and processes.

The plan must assign responsibilities to those who order, purchase, and receive chemical and biological substances. Those responsible must obtain appropriate information about the hazards and ensure that workers are adequately trained and protected. A centralised or structured hazardous product ordering system may help do this.

### Musts

- ✓ Have you prepared an inventory of chemicals and biohazards?
- ✓ Do you have an MSDS control system?
- ✓ Are MSDSs readily available to employees?
- ✓ Are records of worker training kept?
- ✓ Are records of environmental monitoring kept, if needed?
- ✓ Are records of ventilation system maintenance kept, if needed?
- ✓ Is a plan for control of infectious substances kept, where required?

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The plan must address:

- 1 How to prevent the release of hazardous chemical and biological substances in the work environment, or how to minimise the concentrations of hazardous chemical and biological substances in the work environment.
- 2 How to ensure containment and ventilation systems are properly serviced and maintained.
- 3 How to ensure the workplace is properly cleaned and that decontamination procedures for workers are adequate.
- 4 How to ensure personal protective equipment (PPE) is used, cleaned, stored, and maintained properly.
- 5 How to ensure storage is adequate.
- 6 How to ensure emergency response plans are adequate.
- 7 How to provide any necessary monitoring of the work environment.

Regulation 85 deals with hazards associated with *exposure* to an infectious material or organism listed in Table 14 of the Appendix to the regulations.<sup>5</sup> The regulation requires a plan to control infection hazards.

This plan must include:

- a mechanism for identifying workers who may be exposed
- a way of identifying how workers could be exposed
- disinfection and other control measures
- worker training

If you have infectious substances/organisms in your workplace, your occupational health and safety program must include a plan as required by Regulation 85.

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<sup>5</sup> “**Exposure**” is defined as harmful contact through inhalation, ingestion, or absorption through the skin.

### ***When is monitoring required?***

Monitoring (air sampling, personal assessment of exposure, and so forth) 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** The work environment may not be safe because of:
  - (a) lack of information about how badly the workplace is contaminated;
  - (b) fluctuations in concentrations of contaminants;
  - (c) variations in how often workers are exposed to contaminants;  
or
- 2** 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.

Monitoring is not required where there is no standard method of obtaining reliable results or the results obtained with a standard method do not provide meaningful measures of the risk.

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## Develop a training plan for supervisors and workers

### Musts

- ✓ Do you keep records of orientation?
- ✓ Do you keep records of training required by the regulations (such as training required for forklift operators, and so forth)?
- ✓ Do you keep records of crew talks?
- ✓ Are responsibilities for training clearly assigned?
- ✓ Are records kept of training provided to the occupational health committee co-chairpersons?

Regulation 22 (g) requires...*a plan for training workers and supervisors in safe work practices and procedures, including any procedures, plans, policies or programs that the employer is required to develop pursuant to the Act or any regulations made pursuant to the Act that apply to the work of the workers and supervisors.*

Health and safety education and training is critical to making your occupational health and safety program work. While everyone benefits from health and safety training, your training plan must cover the health and safety training needs of workers and supervisors.

The plan must determine how health and safety training will be developed and delivered, and by whom. It must be designed to ensure health and safety education and training begins with worker orientation when a new worker starts with the organisation or a worker is transferred to a different job. An orientation must cover any topic relevant to the health and safety of the worker including; emergency procedures, first aid facilities, any restricted areas, precautions required to protect workers from hazards, and any other health and safety procedures, plans, policies, and programs applying 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 health and safety performance.

The objective of your training plan is to help build health and safety precautions into every job and to increase the level of health and safety knowledge and ability to an accepted level. Health and safety training should be built into training on workers' duties and responsibilities, as well as training on how to do specific work tasks.

### *What is the role of the committee in training?*

One of the duties of the occupational health committee is to establish, promote, and recommend the means of delivery for health and safety training for the education and information of workers. As you consult the committee in developing your health and safety program, this will be an area of particular interest to the committee.

### ***What must worker training include?***

***Train*** means...*to give information and explanation to a worker with respect to a particular subject matter and require a practical demonstration that the worker has acquired knowledge or skill related to the subject matter.*

Training must cover:

- 1** Relevant content of the health and safety program. This includes training on safe work practices and procedures in the program.
- 2** Training on specific matters in the regulations applying to the worker's work, such as lifting, WHMIS, use of respiratory protective devices, scaffolds, and so forth.
- 3** Orientation training as required by Regulation 19. Orientation must cover the content of plans, policies, and programs required by the regulations. Examples include harassment and violence policies, and plans for handling infectious material.
- 4** Legislative health and safety requirements that apply to the worker's job, including the worker's rights and responsibilities.

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### *What training must supervisors receive?*

Supervisors have an important role to play in preventing workplace accidents and illnesses. They must be trained to fulfil that role. They need all of the instruction given to workers, plus the following training:

- 1 Applicable sections of the Act and regulations.
- 2 Relevant elements of the occupational health and safety program, including roles, duties, and responsibilities.
- 3 Safe handling, use, storage, production, and disposal of chemical and biological substances.
- 4 The need for personal protective equipment, how to use it safely, and its limitations.
- 5 Emergency procedures.
- 6 Coaching and motivation.
- 7 Any other matters necessary to ensure the health and safety of workers under their direction.

Supervisors are often responsible for training their workers. If this is the case, supervisors should have the necessary training and skill to:

- instruct workers
- prepare a proper plan of instruction
- explain why each step in a safe work procedure must be followed

## Develop a procedure to investigate accidents, dangerous occurrences, and refusals to work

Regulation 22 (h) requires...*a procedure for the investigation of accidents, dangerous occurrences and refusals to work pursuant to Section 23 of the Act at the place of employment.*

### Musts

- ✓ Have you assigned responsibilities in writing for conducting investigations?
- ✓ Do you keep records of training?
- ✓ Do you have written procedures for conducting investigations?
- ✓ Do you keep accident investigation reports?
- ✓ Do you keep records of corrective action and follow-up measures that have been taken to ensure the action is effective?

Investigations of accidents and dangerous occurrences provide valuable information needed to prevent similar incidents in the future.

A proper investigation of each work refusal is crucial to resolving the refusal and correcting the circumstances that caused the refusal in the first place.

### *What about investigations of accidents and near accidents?*

There are many good reasons why supervisors and managers should investigate accidents and near accidents. Chief among these reasons is that supervisors and managers are responsible for making sure any problems are corrected.

In addition, regulations 29 and 31 require the employer to ensure the occupational health committee co-chairpersons or their designates investigate as soon as reasonably possible:

- 1 Accidents that cause the death of a worker.
- 2 Any accident that requires a worker to be admitted to hospital as an in-patient for 24 hours or more.
- 3 Dangerous occurrences that could cause a worker's death or serious injury.

Once the committee co-chairpersons' investigation is finished, the employer, in consultation with the co-chairpersons, must prepare a written investigation report.

Injuries, illnesses, and conditions that do not require hospitalisation, as well as near accidents, should also be investigated. Examples include chronic illnesses, musculoskeletal injuries, and exposures to infectious materials.



No specific investigation procedure is set out in the regulations. Investigation procedures for accidents and dangerous occurrences must fit your needs. Ideally, they should state:

- the objective of your investigations (find and correct root causes)
- who investigates what incidents (if supervisors or health and safety co-ordinators investigate, the occupational health committee must be kept informed)
- what training investigators and incident responders will receive
- who receives the written investigation reports
- who must fix defects 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 about investigations of workers' concerns?***

An effective hazard identification system should address workers' concerns as soon as they are identified. This will prevent concerns from becoming refusals to work.

### ***What about investigations of refusals to work under Section 23 of the Act?***

The program must include a procedure for investigating refusals under Section 23 of the Act. Section 23 allows the internal workplace system to investigate refusals. It enables the employer to take sufficient steps to deal with the worker's concerns. Failing this, the occupational health committee must investigate and advise the worker.

An occupational health officer should be contacted if the committee cannot agree on the refusal, or if the matter has not been resolved to the satisfaction of the refusing worker. The worker may continue the refusal until the officer provides a written decision.

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Your procedure for investigating refusals to work should address:

- 1 Who should be notified about a refusal.
- 2 How the refusing worker will be informed about his or her rights and duties.
- 3 How the committee will investigate a refusal.
- 4 How the worker(s) who take over the duties of the refusing worker will be informed of their rights and duties.
- 5 Who will take corrective action as a result of the investigation and monitor the effectiveness of the action taken.

## Develop a strategy to involve workers

Regulation 22 (i) requires ...*a strategy for worker participation in occupational health and safety activities, including audit inspections and investigations of accidents, dangerous occurrences and refusals to work pursuant to Section 23 of The Occupational Health and Safety Act, 1993.*

An effective health and safety program needs worker commitment and participation. It must be developed in consultation with your occupational health committee. But more than that, all employees need to be involved in your efforts to prevent accidents and occupational diseases. This is especially important in small organisations, where there may not be the same access to professional health and safety expertise as there is in many large organisations.

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 deeds of managers and supervisors speak louder than words.

Your program must also address how the occupational health committee will be kept effective. Methods include:

- 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 the legislation

The employer is required to resolve any problem or address any concern raised by the occupational 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 committee should be the internal auditor of the occupational health and safety program and should advise the employer on the participation strategy.

### Musts

- ✓ Have you established an effective occupational health committee?
- ✓ Do you maintain occupational health committee minutes?
- ✓ Do you follow-up on concerns brought forward by the committee and ensure corrective action is effective?
- ✓ Do you keep records of committee inspections?
- ✓ Do you keep records of audits conducted by the committee?
- ✓ Do you keep records of worker participation in the development and implementation of policies, plans, and procedures required by the regulations?

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## Regularly evaluate and revise your program

### Musts

- ✓ Have you identified and clearly defined a process to evaluate and revise your program within the time intervals specified in the regulations?

Regulation 22 (j) requires a procedure...*to review and, where necessary, revise the occupational health and safety program at specified intervals that are not greater than three years and whenever there is a change of circumstances that may affect the health or safety of workers.*

The procedure should address how your program will be reviewed and revised, when it will be done, and who will do it.

The program must be completely reviewed every three years. Full or partial reviews and revision are required when there are changes in the workplace that may affect the health or safety of workers, or when defects are discovered. *Changes* include the introduction of new technologies, production methods, or the development of services associated with new hazards. The program should also be reviewed when new risks associated with existing conditions are discovered. *Defects* may be identified through inspections, systematic audits, or investigations of accidents and dangerous occurrences.

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.

See the Appendix for an occupational health and safety program evaluation checklist.

## Use Return-To-Work programs

Your occupational health and safety program is designed to prevent injury and illness. However, once an injury or illness happens, the focus is to return the injured/ill worker to a productive working life as soon as medically possible. Using a Return-to-Work Program in the rehabilitation process can help do this.<sup>6</sup>

Successful Return-to-Work Programs include the following steps:

- 1 Reporting injuries and illnesses.
- 2 Filing required claims forms.
- 3 Monitoring the recovery process.
- 4 Implementing the return-to-work plan.
- 5 Analysing injury and illness trends.
- 6 Taking preventative measures.

### **Return-To-Work Programs**

A successful Return-To-Work Program:

- ✓ Minimises the harm from injury/illness.
- ✓ Retains skilled workers.
- ✓ Provides a process to return injured/ill workers to work as soon as medically appropriate.

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<sup>6</sup> Return-To-Work programs are not part of *The Occupational Health and Safety Act* or regulations.

This information is provided by the Saskatchewan Workers' Compensation Board. For more information, contact the Prevention, Safety and Return-to-Work Unit of the Board in Regina at 787-6916.

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## Summary

- The Division's publication about how to set up an occupational health and safety publication is in two parts. This publication, *Elements of an Occupational Health and Safety Program*, is the first part. It deals with legislative requirements.
- The second part is called *Setting up an Occupational Health and Safety Program: A Guide*. It outlines how to put a program in place and deal with related issues, such as return to work plans.
- The ultimate goal of a program is to protect workers by integrating health and safety into the culture and activities of the organisation.
- Affected workplaces are listed in the Appendix. An effective program will benefit any workplace.
- Your program must meet regulatory requirements, be in writing, have senior management leadership, input from the committee, accountability, and an evaluation/revision mechanism.
- Your program must address the health and safety concerns of subcontractors and the self-employed.
- It must be understood by your workers and, if applicable, explained to your subcontractors and self-employed people.
- The occupational health committee provides input and advice. It audits your occupational health and safety program.

- To carry out your occupational health and safety program:
  - 1 Write a policy that demonstrates your commitment
  - 2 Establish a system to identify and control hazards and emergencies
  - 3 Identify people and resources required to deal with emergencies
  - 4 Prepare a statement of responsibilities
  - 5 Schedule inspections
  - 6 Develop plans to control chemicals and biohazards
  - 7 Develop a training plan for supervisors and workers
  - 8 Develop a procedure to investigate accidents, dangerous occurrences, and refusals to work
  - 9 Develop a strategy to involve workers
  - 10 Regularly evaluate and revise your program
  - 11 Use Return-to-Work Programs to help workers return to productive work faster and easier. For more information, contact the Prevention, Safety and Return to Work Unit of the Workers' Compensation Board in Regina at: 787-6916.

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## Appendix

### Affected workplaces

Section 13 of the Act requires employers at *prescribed* places of employment with ten or more workers to establish and maintain an occupational health and safety program that meets the requirement of regulation 22. These places of employment are listed in Table 7 of the regulations and must have programs:

- Hospitals, nursing homes and home care
- Metal foundries and mills
- Workplaces at which the following types of work are performed:
  - Aerial crop spraying, operation of helicopters, water bombing
  - Autobody and automotive paint repairing, bumper electroplating, auto rust proofing, auto glass installation, auto vinyl roofing, fibreglassing boats and autos
  - Wholesale baking, dairy products, soft drinks and food preparation and packaging
  - Building construction
  - Camp catering
  - Farming and ranching
  - Forestry work other than pulp and paper production
  - Forwarding and warehousing as a business
  - Hard rock mining, shaft sinking and cross cutting
  - Metal manufacturing and machining, marble works, concrete block and ready mix manufacturing
  - Oilwell servicing
  - Oil and gas drilling, well servicing with a rig, water well drilling
  - Processing meat, poultry and fish
  - Road construction and earthwork, urban sewer and water construction, tunnelling
  - Trucking

## Occupational health and safety program evaluation checklist

Use this to help evaluate your occupational health and safety program.

### *What criteria must the program meet?*

- Is your program workplace specific?
- Does it have commitment at the highest level of management?
- Does it have workers' input and involvement?
- Has it been developed in consultation with the occupational health committee?
- Does it have a mechanism to assign specific responsibilities and a system for accountability?
- Does it include an evaluation mechanism?
- Is each of your program elements in writing?
- Is it readily available to workers and the committee?
- Does it include a statement of the health and safety responsibilities of contracted employers and self-employed people?

### *Write a policy that demonstrates commitment*

- Is the policy written, communicated, and posted?
- Is it understood by all employees?
- Does it specify who is responsible and accountable?
- Are resources allocated?

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***Identify and control hazards and emergencies***

- Have the hazards of work processes, equipment, and materials been proactively examined and the risks assessed?
- Has a job safety analysis been done for each hazardous job?
- Has a mechanism been set up to address the concerns of workers?
- Has health and safety been incorporated into all work procedures?
- Have specific responsibilities been assigned for dealing with the concerns of workers and following-up on the effectiveness of corrective action?
- Is a mechanism in place to communicate to workers information about hazards and their risks?
- Have hazard controls been put in place (elimination, engineering, and so forth)?
- Are equipment logbooks maintained?
- Are maintenance records kept?
- Are applicable plans, policies, and procedures required by the regulations in place?
- Are statistics kept and appropriate reports regularly compiled?
- Are responsibilities for each task assigned to specific people?

***Identify people and resources required to deal with emergencies***

- Did you identify and address potential emergencies?
- Do you have a written fire safety/evacuation plan?
- If applicable, do you have written procedures for controlling emergencies involving chemicals and biohazards?
- Do you keep records of emergency training?

***Prepare a statement of responsibilities***

- Do you have written duties and responsibilities regarding occupational health and safety?
- Do you have a means of ensuring accountability?
- Do you keep records of managers', supervisors', and workers' health and safety performance?

***Schedule inspections***

- Do you have written procedures and schedules in place for inspections?
- Do you have clearly defined responsibilities for carrying out inspections?
- Have you provided training to those responsible for carrying out inspections?
- Do you keep written inspection reports?

***Develop plans to control chemicals and biohazards***

- Have you prepared an inventory of chemicals and biohazards?
- Do you have an MSDS control system?
- Are MSDSs readily available to employees?
- Are records of worker training kept?
- Are records of environmental monitoring kept, if needed?
- Are records of ventilation system maintenance kept, if needed?
- Is a plan for control of infectious substances kept, where required?

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***Develop a training plan for supervisors and workers***

- Do you keep records of orientation?
- Do you keep records of training required by the regulations (such as training required for forklift operators, and so forth)?
- Do you keep records of crew talks?
- Are responsibilities for training clearly assigned?
- Are records kept of training provided to occupational health committee co-chairpersons?

***Develop a procedure to investigate accidents, dangerous occurrences, and refusals to work***

- Have you assigned responsibilities in writing for conducting investigations?
- Do you keep records of training?
- Do you have written procedures for conducting investigations?
- Do you keep accident investigation reports?
- Do you keep records of corrective action and follow-up measures that have been taken to ensure the action is effective?

***Develop a strategy to involve workers***

- Have you established an effective occupational health committee?
- Do you maintain occupational health committee minutes?
- Do you follow-up on concerns brought forward by the committee and ensure corrective action is effective?
- Do you keep records of committee inspections?
- Do you keep records of audits conducted by the committee?
- Do you keep records of worker participation in the development and implementation of policies, plans, and procedures required by the regulations?

***Regularly evaluate and revise your program***

- Have you identified and clearly defined a process to evaluate and revise your program within the time intervals specified in the regulations?