



CORPORATE SAFETY

MANAGEMENT LEADERSHIP ELEMENT

CORPORATION OF THE CITY OF WINDSOR

March 2002

J. Skorobohacz

John Skorobohacz, Acting Chief Administrative Officer

June 3, 2002

Date



CORPORATE SAFETY

MANAGEMENT LEADERSHIP ELEMENT

TABLE OF CONTENTS

<u>ITEM</u>	<u>PAGE</u>
POLICY STATEMENT IMPLEMENTATION STATEMENT PROGRAM OVERVIEW	3
PROGRAM DUTIES AND RESPONSIBILITIES	11
DISPUTE RESOLUTION	16
REPORTING HAZARDOUS CONDITIONS	17
RIGHT TO REFUSE	19
RIGHT TO STOP WORK	22
MINISTRY OF LABOUR REQUIREMENTS	25
STEERING COMMITTEE GUIDELINES	33
ALLEGED REPRISALS	43
DISCIPLINE AND ENFORCEMENT	44
MANAGEMENT COMMUNICATION	48
PHYSICAL CONDITIONS INSPECTIONS	51
COMPLIANCE ACTIVITY PLAN TEMPLATE	54

OCCUPATIONAL HEALTH AND SAFETY

POLICY STATEMENT

The Corporation of the City of Windsor (Corporation) acknowledges its duty and responsibility to provide safe and healthy working conditions and training as required for all employees. The Corporation is committed to the care, welfare, safety and security of all employees. Safety policies and workplace specific procedures will be developed, documented and implemented to maintain safe and healthy working conditions at all work locations; the Corporation will comply with applicable health and safety legislation; maintain equipment, materials, devices and premises in good and safe condition as required, and ensure that all employees comply with all applicable health and safety procedures.

As the Employer, *the Corporation* is committed to and will:

- i) Take all reasonable steps to ensure that all employees are treated with dignity and respect in the workplace.
- ii) Take all reasonable steps to prevent harassment and bullying in the workplace.
- iii) Take all reasonable steps to prevent personal injury to employees and to the public, and maintain a safe and healthy working environment.
- iv) Comply with the Occupational Health and Safety Act (OHSA) and its applicable regulations.
- v) Hold accountable, all levels of management, supervision and adherence to this policy as specified in the Corporate Management and Leadership Policy.
- vi) Take disciplinary action, up to and including termination, against those persons who fail to comply with, or adhere to this policy, and the programs and procedures established under it.
- vii) Establish and maintain a joint management/labour health and safety committee system to promote employee involvement and cooperation; and to assist in the continuous improvement of employee and workplace health and safety.
- viii) Ensure that all contractors and subcontractors performing work on behalf of the Corporation shall, as part of their contracts, agree to comply with all relevant workplace health & safety legislation, codes, standards and practices.
- ix) Review this policy annually to determine its effectiveness.
- x) Employees who direct work will ensure that relevant regulations and safe work procedures are followed by their employees, that effective training is provided to their employees and that safe work procedures are implemented and followed.
- xi) All employees are responsible for observing applicable legislation in their work area and for following safe work procedures. Employees shall report unsafe behaviour to his/her Supervisor.

The Corporation recognizes and emphasizes that all employees, at all levels and functions, must accept responsibility for achieving the policy objectives. Health and Safety performance is an important indicator of managerial leadership and individual performance.

John Skorobohacz

May 15, 2006

Chief Administrative Officer
The Corporation of the City of Windsor

Date

OCCUPATIONAL HEALTH AND SAFETY

IMPLEMENTATION STATEMENT

The Corporation's Occupational Health and Safety (OHS) policy requires the establishment and maintenance of a program in order to effectively implement the policy. The program will implement and put into effect the policy objectives and will set, communicate and enforce the health and safety standards that protect employees of the Corporation. The development of standards will be based on the legislative requirements of the *OHSA and regulations*. Where no specific legislative requirements exist, standards will be developed based on... *taking every precaution reasonable in the circumstances for the protection of an employee.*

Corporate OHS Program standards will be established in writing and will contain all the necessary information to allow employees to perform hazardous tasks or activities safely; or allow employees to carry out health or safety related functions effectively. Standards will be understandable, clear and concise and kept current through a revision process to reflect changes in workplace conditions and legislative requirements. The complexity of the content of standards will be determined by the degree of risk of the task or activity.

Standards will be made available and accessible to all employees expected to adhere to, and comply with them.

Written standards will communicate the following to employees:

- i) Required safety and protective equipment;
- ii) Instructions for pre-operational safety checks of equipment;
- iii) Precautions for safe equipment operation; and
- iv) Additional safety information, where appropriate.

Written standards will contain the following information:

- i) Preparation date;
- ii) Procedure subject;
- iii) Required safety or protective equipment for the task or activity;
- iv) Preparatory instructions and safety checks for the task or activity;
- v) Performance instructions for the task or activity; and
- vi) Instructions for completing related documentation, records, forms, checklists, etc. associated with the task or activity.

All *Management Levels* of the Corporation are responsible for the implementation of the OHS Policy and for ensuring that all health, safety and medical protection resources, programs and standards are in place and maintained.

OCCUPATIONAL HEALTH AND SAFETY

MISSION STATEMENT

The Corporation, with the involvement of its employees, will provide and maintain a safe and healthy work environment, where Occupational Health and Safety (OHS) is integrated into all operations and services conducted and provided by the Corporation.

OBJECTIVE

Develop, implement and maintain a Corporate OHS Program that is integrated into the Corporation's related management systems and provides for:

- The safeguarding of employees;
- Legislative compliance;
- Due diligence for the corporation, directors and officers; and
- The control and reduction of costs.

The Corporate OHS Program will be developed, implemented and maintained by continuous improvement and evaluation that will incorporate the following:

- Corporate audits and inspections;
- Departmental/Divisional audits and inspections; and
- Central and Divisional Joint Health & Safety Committee inspections and meetings.

PROGRAM MANAGEMENT PRINCIPLES

1. ***Planning***

The development and implementation of the Corporate OHS Program requires the establishment of action plans and performance schedules. These will provide management, supervision and workers with consistent direction.

2. ***Organization – Shared Responsibility***

The Corporate OHS Program (organizational) Structure will be clearly and continually communicated and promoted to all employees. Personal responsibility and accountability will be emphasized as an important overall element of the Program. All employees must take ownership and responsibility for their own health and safety; the health and safety of other employees; and employees under their supervision. This principle must be consistently fostered and communicated through training, communication and information.

3. ***Leadership***

The success of the Corporate OHS Program will involve both organizational and individual changes in the operational approach and philosophy of the provision, delivery and maintenance of occupational health and safety services. The visible and demonstrated support of senior management will facilitate these changes and create an infrastructure to support this process.

4. ***Proactive and Prevention Based Strategies***

The Corporate OHS Program will focus on the proactive assessment, control and management of hazards; and communication of that information to employees. This approach will seek to improve the *OHS System*.

5. ***Continuous Improvement***

Success of the Corporate OHS Program will be achieved by the monitoring and evaluating to *established program standards*. Identification of deficiencies; opportunities for improvement and root cause analyses will seek to reduce the *repetitive* identification and correction of hazards.

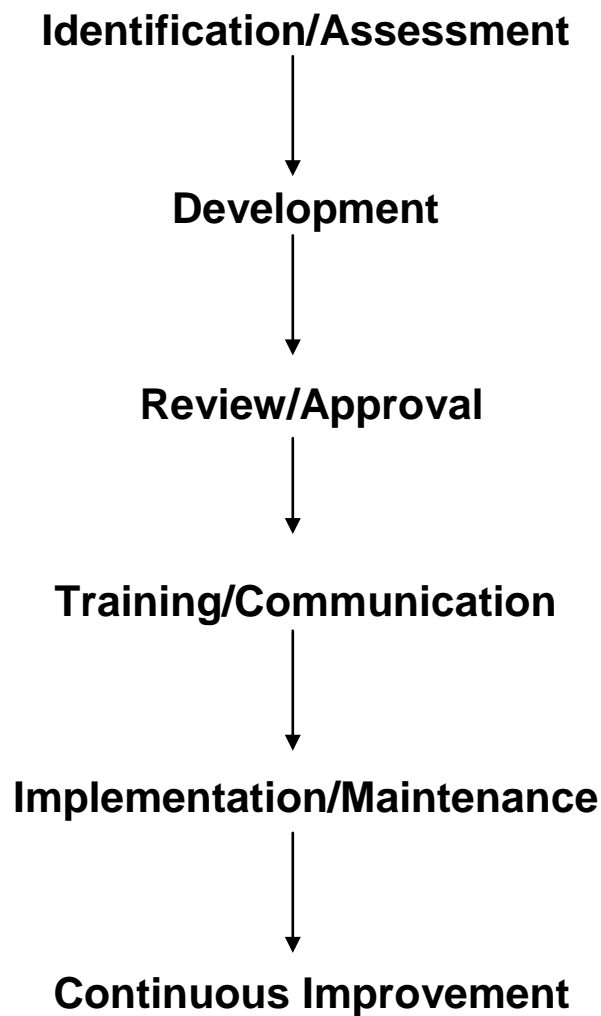
CORPORATE OHS PROGRAM

MANAGEMENT SYSTEM ELEMENTS

- 1. Management Leadership**
- 2. Training & Communication**
- 3. Hazard Control**
- 4. Equipment Safety**
- 5. Occupational Hygiene**
- 6. Project & Service Contractors**
- 7. Accident & Incident Investigation**
- 8. Ergonomic Injury Prevention**
- 9. Hazardous Materials**
- 10. Evaluation & Improvement**

CORPORATE OHS PROGRAM

DEVELOPMENT PROCESS



CORPORATE OHS PROGRAM TRAINING AND COMMUNICATION PROCESS

Training Needs Analysis



**Identify Learning Objectives/
Develop Training Program**



Identify Target Group



Schedule Training



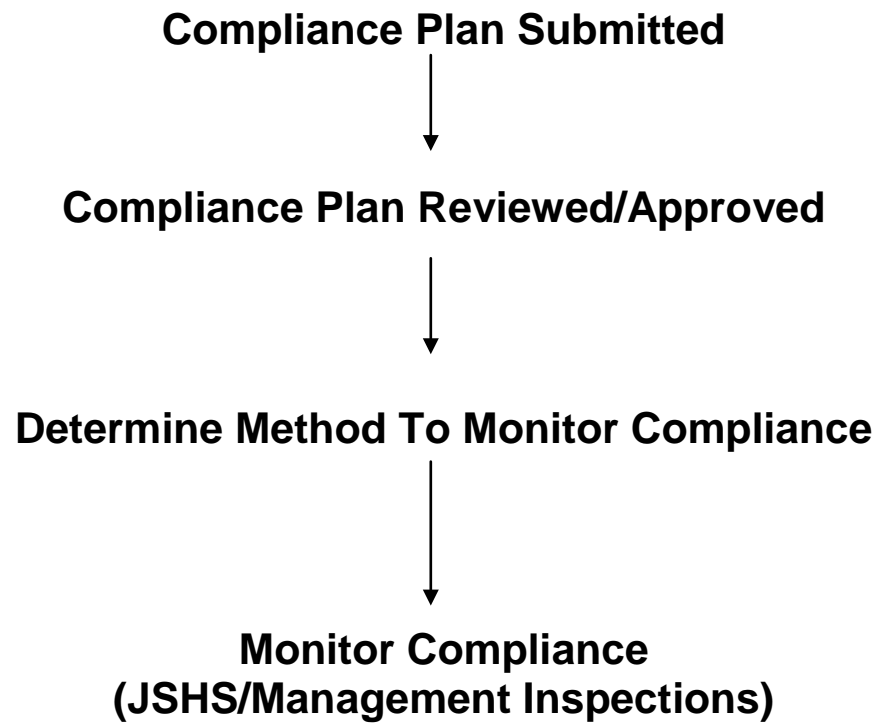
Deliver Training



Feedback/Evaluation

CORPORATE OHS PROGRAM

IMPLEMENTATION PROCESS



CORPORATE OHS ORGANIZATIONAL STRUCTURE

DUTIES AND RESPONSIBILITIES

CITY COUNCIL

Responsible to establish a management system and structure to ensure that the Corporation is duly diligent in taking reasonable care, pursuant to the OHS section 32, to comply with:

1. The OHS and regulations;
2. Orders and requirements of inspectors; and
3. Orders of the Minister.

City Council is responsible for ensuring the Corporation's due diligence and providing a safe and healthy workplace for employees. These OHS activities are delegated throughout the Corporation's management structure.

CHIEF ADMINISTRATIVE OFFICER (CAO)

In addition to the duties and responsibilities outlined in the OHS, sections 27 and 28, the CAO shall be responsible for directing the Corporation OHS activities and ensuring that:

1. A Corporate OHS Program is developed, established, put into effect and maintained to implement the OHS policy;
2. The performance reviews of employees include evaluation of their OHS Program responsibilities;
3. Corporate OHS Program Plans and Schedules are developed and put into effect;
4. The performance and evaluation of the Corporate OHS Program is an agenda item in Senior Management Team (SMT) meetings;
5. Corporate OHS Program promotional and educational activities are supported through active participation; and
6. The continuous improvement of the Corporate OHS Program.

HUMAN RESOURCES DEPARTMENT

Responsible for development of the Corporate OHS Program, and to:

1. Develop and establish Corporate OHS Program standards and procedures;
2. Facilitate SMT review and approval of Corporate OHS Program standards and procedures;
3. Distribute Corporate OHS Program standards and procedures to Departments;
4. Provide advice and assistance to Departments in the preparation of departmental compliance plans;
5. Prepare and submit Corporate OHS Program compliance plans to the SMT for review and approval;
6. Develop, schedule and deliver training and communication programs for all levels of employees in Corporate OHS Program standards and procedures;
7. Determine and establish corporate and departmental compliance to established Corporate OHS Program standards and procedures; and recommend opportunities for improvement;
8. Conduct regular audits and inspections of Corporate workplaces;
9. Collect, analyze and distribute (to the SMT and Departments) Corporate injury and incident statistics;
10. Monitor Central and Departmental Committee activities and recommend opportunities for improvement;
11. Support the Corporate OHS Program through promotional, educational and advisory activities and the development of OHS programs; and
12. Assist in the continuous improvement of the Corporate OHS Program.

DEPARTMENTS

Responsible for implementing and maintaining, in an effective manner, all applicable requirements of the Corporate OHS program, and to:

1. Implement/maintain Corporate OHS Program standards and procedures;
2. Prepare and submit compliance plans to Human Resources Department for all applicable Corporate OHS Program standards and procedures;
3. Schedule employee attendance at required Corporate OHS Program training and communication sessions;

4. Develop monitoring and enforcement strategies for established Corporate OHS Program standards and procedures; and recommend opportunities for improvement;
5. Support the Corporate OHS Program through departmental promotional, educational and advisory activities; and
6. Ensure the continuous improvement of the department's Corporate OHS Program activities.

JOINT HEALTH & SAFETY COMMITTEES (COMMITTEES)

The Corporation's *Committees* are advisory bodies to the Corporation and its employees, as specified under section 9 of the OHSA. In addition to these legislated functions and powers, the *Committees'* roles are to:

1. Audit the effectiveness of the Corporate OHS Program development, implementation and maintenance process;
2. Identify and recommend opportunities for improvement in the Corporate OHS Program management system;
3. Establish roles, goals and objectives associated with Corporate OHS Program activities;
4. Liaise with management and employees to identify and reduce the risk of injury and illness at the Corporation's workplaces; and
5. Promote the continuous improvement of the Corporate OHS Program.

GENERAL MANAGERS

In addition to the duties and responsibilities outlined in the OHSA, sections 27 and 28, the General Managers are responsible for directing their respective Department's OHS activities and ensuring:

1. The Corporate OHS Program is implemented and maintained, in an effective manner, for the protection of each employee under the Department's jurisdiction;
2. Each employee's OHS performance is evaluated to Corporate OHS Program standards and procedures;
3. Compliance plans are developed and submitted to the Human Resources Department for implementation of applicable Corporate OHS Program standards and procedures;
4. Employees authorized with responsibility under the Corporate OHS Program are provided with the equipment, protective devices and resources to carry out those responsibilities;

5. Implementation and maintenance of Corporate OHS Program standards and procedures is an agenda item in Departmental management meetings;
6. The Corporate OHS Program is supported through departmental promotional and educational activities; and
7. The development and maintenance of a continuous improvement process for Corporate OHS Program activities.

EXECUTIVE DIRECTORS

In addition to the duties and responsibilities outlined in the OHSA, sections 27 and 28, *Executive Directors* are responsible for directing Divisional OHS activities, as delegated by the General Managers, and ensuring:

1. Employees are aware of applicable requirements of the Corporate OHS Program;
2. Employees work with, and in compliance with the applicable requirements of the Corporate OHS Program;
3. Employees are aware of the Corporate OHS Program criteria for employee performance;
4. Employee participation in Corporate OHS Program promotional and educational activities; and
5. The implementation, maintenance and promotion of the department's continuous improvement process.

MANAGERS

In addition to the duties and responsibilities outlined in the OHSA, sections 27 and 28, *Managers* are responsible for directing OHS activities within the Division, as delegated by the Executive Directors, and ensuring:

1. Employees work in compliance with Corporate OHS Program standards and procedures;
2. Employees work in such a manner, and refrain from activities that may endanger themselves or other employees;
3. Employees are aware of any potential or actual dangers and hazards in divisional workplaces;
4. Potential or actual dangers and hazards in divisional workplaces are reported and corrected; and
5. Employees attend applicable Corporate OHS Program training and communication sessions.

SUPERVISORS

In addition to the duties and responsibilities outlined in the OSHA, sections 27 and 28, *Supervisors* shall ensure, that each employee under their direct supervision:

1. Works in compliance with Corporate OHS Program standards and procedures;
2. Works in such a manner, and refrains from activities that may endanger themselves or other employees;
3. Is aware of any potential or actual dangers and hazards in the workplace; and
4. Reports potential or actual dangers and hazards.

EMPLOYEES

In addition to the duties and responsibilities outlined in the OSHA, section 27, *an Employee* (i.e., *a worker as defined in the OSHA, section 1*) shall:

1. Comply with all applicable requirements of the Corporate OHS Program;
2. Immediately report potential or actual hazards or dangers (that the employee is aware of) to their immediate supervisor;
3. Take an active role in protecting and promoting the health and safety of themselves and other employees;
4. Refrain from activities that may jeopardize the health and safety of themselves and other employees; and
5. Participate in applicable Corporate OHS Program training.

DISPUTE RESOLUTION

PURPOSE

To provide a systematic mechanism that will resolve disputes arising from the development, implementation or maintenance of the Corporate Health and Safety Program.

To provide to departmental staff, a protocol which identifies disputes and initiates a mechanism whereby disputes are resolved in a timely manner, and in such a way as to not negatively impact on the Corporate Health and Safety Program.

WHEN A DISPUTE ARISES

- 1, Health and Safety staff will work with front-line departmental staff in order to achieve consensus.
2. If consensus is not achieved, the matter will be referred to the appropriate Director and the Corporate Supervisor of Health & Safety in an attempt to achieve resolution. Review at this step is to be completed within five working days.
3. In the absence of an accord, the concern will be referred to the SMT and tabled at the next regularly scheduled meeting.

The above will provide a streamlined process in order to address any issues that arise.

REPORTING HAZARDOUS OR UNSAFE CONDITIONS

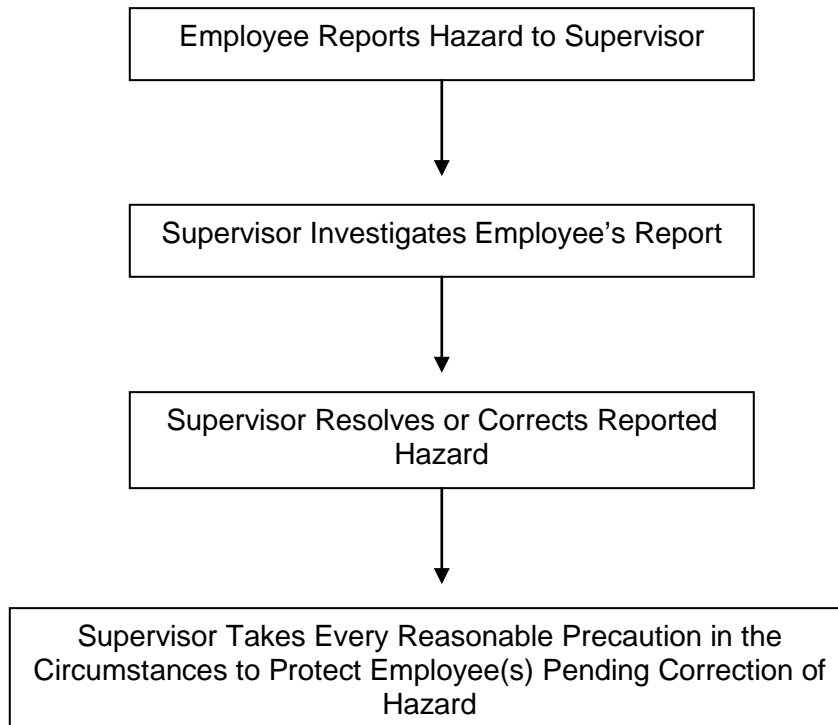
PROCEDURE

The following steps must be followed when an employee becomes aware of...the existence of a hazard or potential hazard that may endanger himself/herself or another employee; a contravention of the OSHA or regulations that may endanger himself/herself or another employee; or a missing or defective protective device or protective equipment:

1. The employee shall immediately report the matter to his/her supervisor.
2. The supervisor shall promptly investigate the matter and correct, or take steps to correct the matter.
3. Where, for any reason the matter cannot be resolved or corrected, (i.e., at least by the end of the work shift) the matter will be corrected as soon as is reasonable and practical in the circumstances given the degree of risk to which the employee(s) are exposed.
4. Where the supervisor determines that the matter is such that an employee may be exposed to imminent danger, then immediate corrective action shall be taken in a way that does not endanger any employee.
5. The corrective actions, or steps taken to correct any reported matter will be communicated to the employee(s).
6. The supervisor shall document the actions taken to resolve all reported matters.
7. Where the supervisor fails to correct, or take steps to correct the matter; or the employee is not satisfied with the supervisor's response or action, then the employee should report the matter to a Committee member, and the member shall consider the information.
8. A supervisor or employee who fails to comply with the requirements of this procedure is subject to disciplinary action, up to and including termination.

Reference: OSHA Sections 27 and 28.

REPORT OF HAZARDOUS OR UNSAFE CONDITIONS



RIGHT TO REFUSE WHERE HEALTH AND SAFETY IN DANGER

PROCEDURE

It is the policy of the Corporation to ensure that employees are provided with a safe and healthy work environment; and that hazardous or dangerous conditions are promptly corrected for the protection of all employees. Where an employee has a reason to believe that a hazardous or dangerous condition exists and that condition may endanger him or her, *and refuses to work*, then an investigation will be established.

The reporting and investigation protocol will comply with the requirements of OHSA section 43.

1. The employee shall promptly report to his/her immediate (or first available) supervisor the circumstances of his/her refusal to work.
2. The supervisor shall clarify that the refusal to work is occupational health and safety (OHS) related; and not a concern or complaint.

*Note: Where the employee is reporting an OHS concern or complaint, the *Reporting Hazardous or Unsafe Conditions Procedure* shall apply and will be followed.*

3. The supervisor shall thoroughly document the refusal to work using the prescribed “**Work Refusal and Investigation**” **Reporting Form**. This form is located in the Corporate Health and Safety web page on Dashboard under the heading *Health and Safety Forms*.
4. The supervisor shall ensure the employee remains in a safe place near his/her workstation pending the investigation.

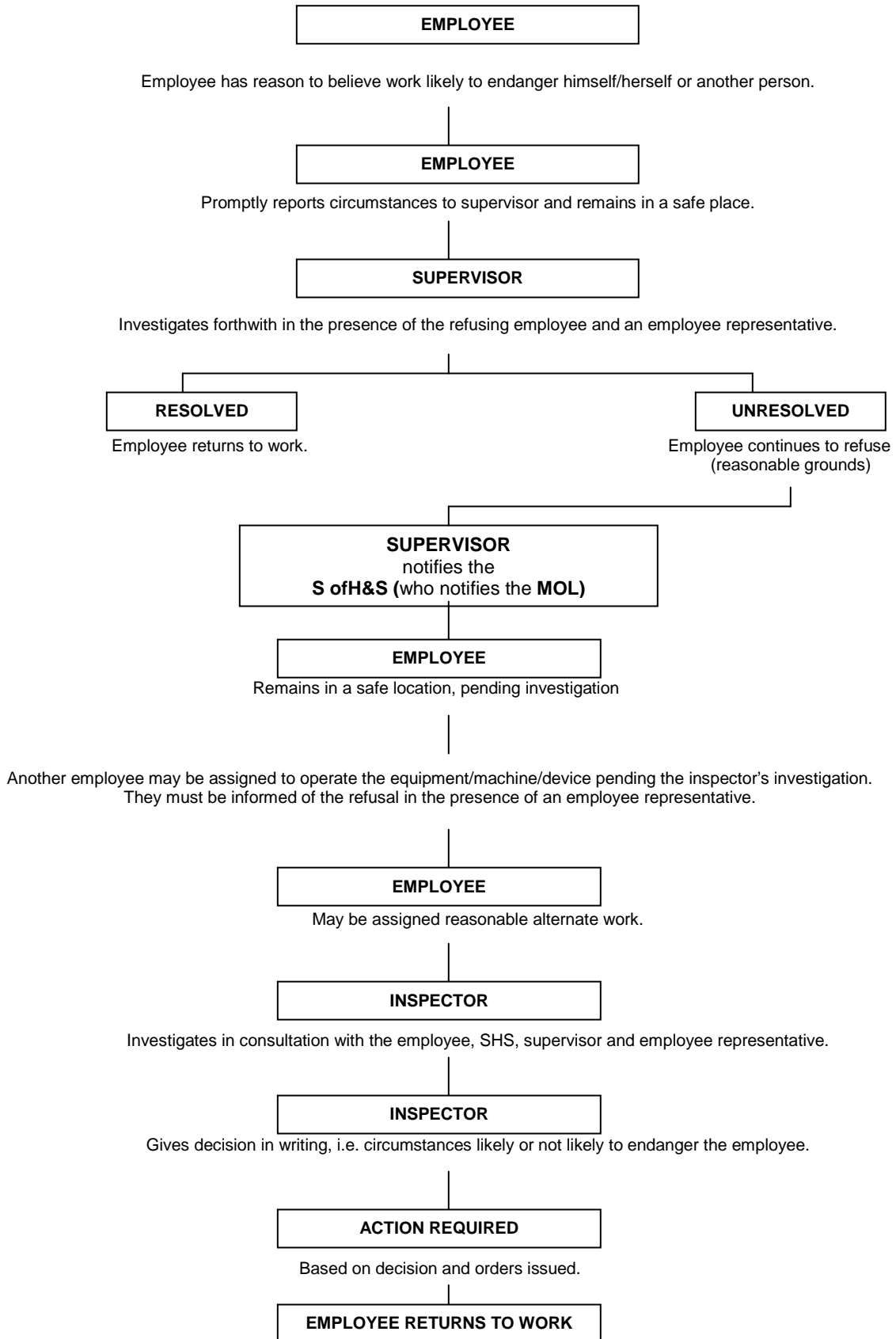
Note: The refusing employee is not to be assigned other work. No employee is to be assigned the work, or work activity related to work refusal.

5. The supervisor shall notify and immediately make available a Committee member (who represents workers, **if applicable**), or union representative to be present for the investigation.

6. The supervisor shall ensure that the employee; and Committee member or union representative are present for the investigation.
7. The supervisor shall immediately report the circumstances of the refusal to work to the Corporate Supervisor of Health and Safety.
8. The supervisor shall provide all reasonable and pertinent information (related to the circumstances of the employee's refusal to work) to the employee pending arrival of the Supervisor of Health and Safety.
9. Where the supervisor agrees that the circumstances related to the employee's refusal to work are likely to endanger the employee, the supervisor in consultation with the Supervisor of Health and Safety shall correct, or take steps to correct the hazardous or dangerous condition(s) immediately.
10. Where following the investigation, or any steps to deal with the circumstances of the employee's refusal to work, and the employee has stated his/her... *reasonable grounds to believe that the hazardous or dangerous condition continues to exist*, the supervisor and Supervisor of Health and Safety shall:
 - document the employee's *reasonable grounds to continue to refuse to work*; and
 - arrange for reasonable alternative work for the employee.

Note: Other employees may be asked to perform the work, or work activity related to the refusal to work, but only in the presence of a Committee member or union representative.
11. The Supervisor of Health and Safety shall contact the Ministry of Labour (MOL) and report the circumstances of the refusal to work.
12. Following the conclusion of the work refusal, the subsequent investigation and any follow up to the particular circumstances have been dealt with, the supervisor investigating the refusal shall ensure documentation is completed on the prescribed form, the "**Work Refusal and Investigation**" **Reporting Form**". This supervisor shall then ensure that the completed document is disseminated to the following distribution list: the refusing employee, the respective JSHS, and the General Manager of the department in which the work refusal occurred and the Supervisor of Health and Safety. The supervisor shall retain a copy of the completed Reporting Form for his or her own records.

WORK REFUSAL CHART



RIGHT TO STOP WORK WHERE HEALTH OR SAFETY IN DANGER

PROCEDURE

It is the policy of the Corporation to ensure that a safe and healthy work environment is provided and maintained for employees. Hazardous or dangerous conditions will be promptly corrected for the protection of all employees. However, where a certified committee member has a *reason to believe* that *dangerous circumstances* exist, the Corporation will investigate the matter forthwith. These requirements apply to a request for an investigation by a certified committee member, who has reason to believe that *dangerous circumstances* exist, or where a certified committee member receives a complaint that *dangerous circumstances* exist and the *dangerous circumstances* meet the definition outlined in OHSА subsection 44(1).

Dangerous circumstances means a situation in which:

- a provision of the OHSА or regulations is being contravened;
- the contravention poses a danger or a hazard to an employee; and
- the danger or hazard is such that any delay in controlling it may seriously endanger an employee.

Section 44 defines *dangerous circumstances* for the purposes of OHSА sections 45-48.

The reporting and investigation protocol will comply with the requirements of OHSА section 45 .

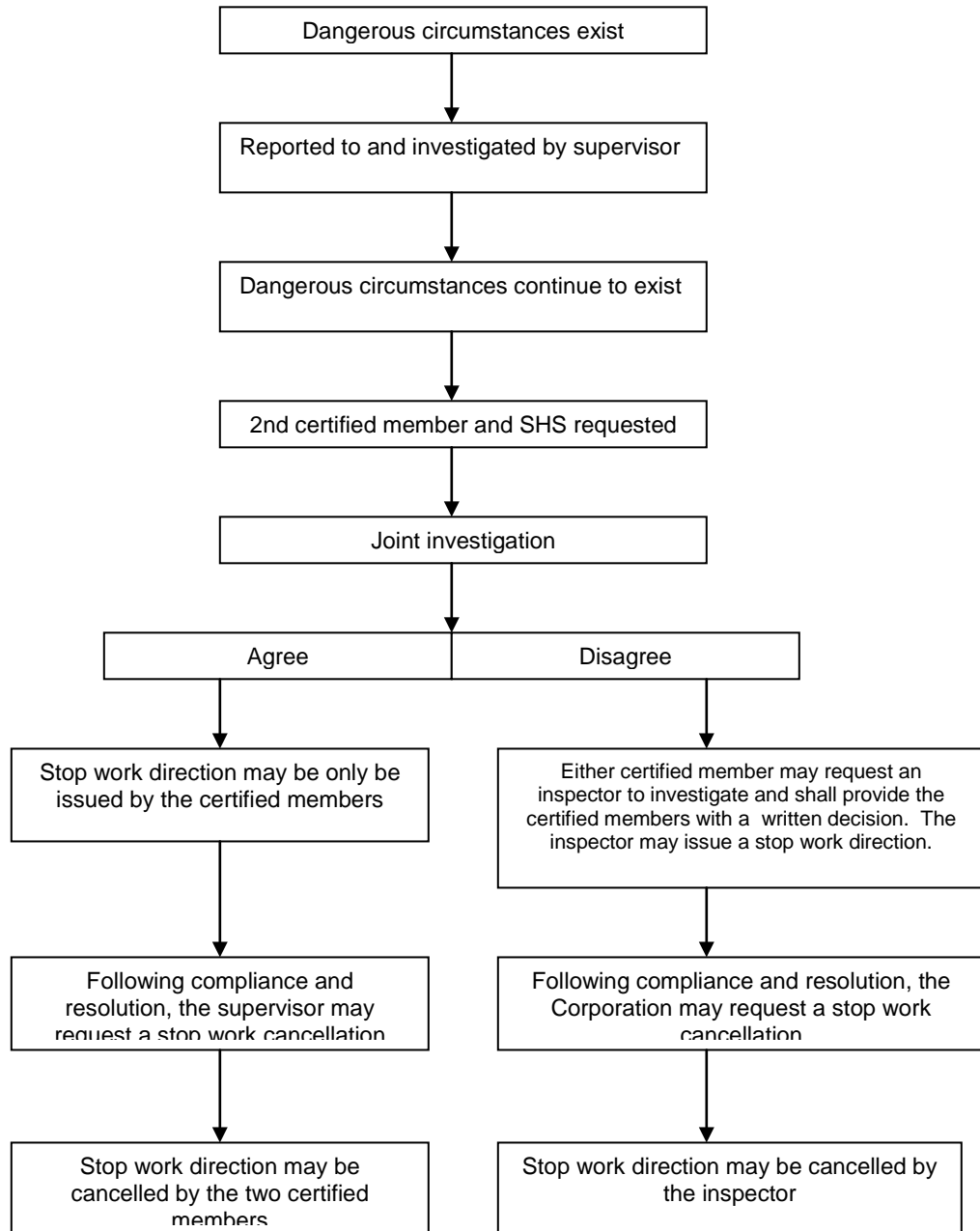
1. An employee shall promptly report all hazardous or dangerous conditions to their immediate supervisor or to an available supervisor.
2. Where a certified committee member becomes aware of the existence of *dangerous circumstances*, the member shall immediately report the matter to a supervisor.

3. The supervisor shall promptly investigate the report of *dangerous circumstances* by the certified committee member in the presence of that member.
4. Following the investigation, or any steps taken to resolve the matter, the certified committee member may request the presence of a second certified committee member (representing the other workplace party) to investigate the matter. The supervisor shall notify the second member forthwith and the *Corporation's Supervisor of Health and Safety (SHS)*.

Note: This is only initiated where dangerous circumstances continue to exist following the initial investigation.

5. The second certified committee member shall promptly investigate the matter in the presence of the first member, the supervisor and the SHS.
6. If both certified committee members agree that *dangerous circumstances* exist, the supervisor shall stop the work or the use of any equipment, machinery, etc. that is causing the *dangerous circumstances*.
7. The supervisor shall correct, or take steps to correct the situation that caused the *dangerous circumstances*. Where the certified committee members *do not* agree whether *dangerous circumstances* exist, the SHS shall immediately notify the Ministry of Labour (MOL) of the matter.
8. No employee shall be directed or requested to perform the work, or work activity related to the *dangerous circumstances* until the matter is resolved.

CERTIFIED MEMBER WORK STOPPAGE REFERENCE CHART



MINISTRY OF LABOUR - INSPECTION, INVESTIGATION AND PROTOCOL REQUIREMENTS

POLICY

It is the policy of the Corporation to promote and establish a co-operative and professional working relationship with Ministry of Labour (MOL) Inspectors. The Corporation is committed to improving health and safety at the workplace. Fostering a positive relationship with the MOL and accepting their inspection and investigation mandate is recognized as part of the improvement process. These requirements seek to promote this philosophy, and to ensure that the Corporation provides accurate information while managing exposure to legal liability.

PURPOSE

The purpose of these requirements is to ensure a consistent response and working relationship is maintained with MOL Inspectors while they carry out their duties and powers under the OHSA.

SCOPE

These requirements apply to all Corporation employees; and when an MOL Inspector is conducting an inspection or an investigation at the workplace under the powers conferred pursuant to 54(1) of the OHSA. These requirements **do not apply** to construction, or a construction project, as defined in Section 1 of the OHSA, where the Corporation is strictly the Owner, as defined in Section 1 of the OHSA

Definitions

OHSA - Occupational Health & Safety OHSA, 1990

Approved - Approved by the Corporation

Authorized - Authorized by the Corporation

Committee - means a joint health and safety *committee* as defined in Section 1 of the OHSA

Inspector - means a Ministry of Labour Inspector as defined in Section 1 of the OHSA

Employee - a person who supplies/provides services and is employed by the Corporation

Workplace - land, facilities and premises including mobile equipment and vehicles being utilized by the Corporation, and where a employee is working or may work.

Responsibility

Employees

Responsible to comply with these requirements.

Responsible to fully co-operate with an Inspector in the carrying out of their duties and powers under the OHSA.

Responsible, to the extent possible, that an Inspector is not hindered, obstructed, or interfered with, in the carrying out of their duties and powers under the OHSA.

Managers & Supervisors

Responsible to ensure employees comply with these requirements.

Responsible to continue the process of Job Performance Management.

Executive Directors

Responsible for ensuring the division is in compliance with applicable provincial Health & Safety legislation.

Responsible for ensuring the division is in compliance with these requirements.

General Managers

Responsible for ensuring the department is in compliance with applicable provincial Health & Safety legislation.

Responsible for ensuring the department is in compliance with these requirements.

Procedure

General

1. Every employee shall furnish all necessary means to facilitate any entry, inspection, examination or inquiry by an Inspector in the exercise of their powers or performance of their power under the OHSA or regulations.
2. Upon an Inspector's arrival at the workplace, the most senior management level (at the site) must immediately be notified.
3. The site management representative will determine the reason for the visit (i.e. inspection, investigation, etc.) and what persons the Inspector requires to conduct the inspection/investigation.
4. The site management representative will immediately notify and contact the Supervisor of Health and Safety (SHS), or **designate** and inform the SHS of the Inspector's presence at the workplace and the reason for the visit.
5. The SHS shall attend without delay.
6. Pending the arrival of the SHS, the site management representative shall:
 - arrange for the persons mentioned in 3. to be made available;
 - arrange for any committee documents to be made available;
 - arrange for a meeting room to be made available; and
 - prepare relevant notes.
7. Pending the arrival of the SHS, the site management representative shall co-operate fully with the Inspector.
8. Requests for relevant information or documents in the committee's possession (or provided to the committee by the Employer) should be met on a priority basis.
9. Requests for additional information should be referred to the SHS.
10. The SHS or site management representative shall accompany the Inspector during the course of any inspection/investigation and actively participate in that inspection.
11. The SHS or site management representative shall make notes of observations, and any comments made by the Inspector during the inspection/investigation.
12. No employee shall hinder, obstruct, molest or interfere with an Inspector in the exercise of a power or the performance of their duty under the OHSA.
13. An employee who knowingly fails to comply with these requirements or their intent, or who knowingly permits a employee under his/her supervision to fail to comply with these requirements is in contravention of these requirements and is subject to disciplinary action up to and including termination.

MOL Orders or Requirements

14. The SHS (or designate) shall be present and participate in the process of an Inspector's issuance of:
 - an oral order or requirement;
 - a written order/requirement; and
 - a Field Visit Report.
15. Where compliance with an order or requirement will require substantial planning or financial resources,
 - time-frames for compliance should be discussed with the Inspector; or
 - a request for a Compliance Plan under subsections 57(4) and (5) of the OHS Act should be requested by the SHS.
16. MOL reports and subsequent orders or requirements will be reviewed by the SHS and where appropriate, consultations will be initiated by the SHS with, but are not limited to, Senior Departmental Management; the SMT, or the Legal Services Division regarding.
17. Appeals of an order or requirement of an Inspector shall be considered following this review and consultation.
18. Where an appeal is filed with the Ontario Labour Relations Board (Board) and pending disposition of the appeal, a request for a suspension of the order or requirement shall be submitted to the Board.

Compliance Notification

19. Orders or requirements will be complied with as soon as is practical, but in any event no later than the date specified in the order or requirement.
20. The divisional workplace (site location) issued the order or requirement shall notify the SHS as soon as compliance is achieved or as soon as possible that the compliance date cannot be met.
21. Where a compliance date cannot be made the senior management representative shall provide an explanatory memo with a new compliance date to the SHS, who shall notify the respective departmental committee forthwith.
22. The SHS shall inform the Inspector forthwith.
23. As soon as a divisional workplace (site location) believes compliance with the order or requirement has been achieved a Notice of Compliance will be submitted to the SHS.
24. The Notice of Compliance shall be signed by the Senior Site Management Representative (or designate) and an employee committee member.

25. The employee committee member will stipulate that they agree or disagree with the Notice or the employee member may decline to sign the Notice.
26. The SHS shall submit the Notice of Compliance to the MOL via *facsimile and regular post mail*.
27. The Notice of Compliance shall be posted conspicuously in the workplace for fourteen (14) days.
28. A copy of the Inspector's Field Visit Report and signed Notice of Compliance shall be provided to each Department Head.

Accidents – Critical Injury or Fatality

The following requirements apply when a person is killed or critically injured from any cause at the workplace. A critical injury is defined in O.Reg.834, and means an injury of a serious nature that,

- places life in jeopardy;
- produces unconsciousness;
- results in substantial loss of blood;
- involves the fracture of a leg or arm;
- involves the amputation of a leg, arm, hand or foot;
- consists of burns to a major portion of the body; or
- causes the loss of sight in an eye.

29. Provide immediate care and first-aid to the victim; arrange for medical attention and transportation to a health care facility.
30. Immediately arrange for, and ensure notification of the incident to Senior Management, the SHS, the committee, and the trade union.
31. Secure the accident scene and ensure the scene and area are not disturbed *except* for saving life and relieving human suffering.
32. *Immediately*, and where possible... take photographs, or video tape the accident scene; obtain witness statements (dated and signed) and secure physical evidence.
33. Upon arrival of the Police Department and MOL, provide full cooperation but *do not*, release any written statements or internal investigation reports; provide any statements; or make any comments or statements to the media until the SHS (or designate) has arrived, and the Legal Services Division has been consulted.
34. The SHS and Legal Services Division shall be consulted prior to the release and submission of any internal investigation report. No internal investigation report (with findings) is to be released to the MOL and committee until reviewed, approved and authorized.
35. The SHS shall submit the completed investigation report to the MOL and committee within 48 hours of the occurrence. A copy shall be provided to the SMT.
36. A summary of the investigation report shall be posted conspicuously in the workplace.

Work Refusals

The following requirements apply when a employee refuses to work on health or safety grounds pursuant to subsection 43(3) of the OHSA, and where an employee has reason to believe that,

- any equipment, machine, device or thing he or she is to use or operate is like to endanger himself, herself or another employee;
- the physical condition of the workplace or the part thereof in which he or she works or is to work is likely to endanger himself or herself; or
- any equipment, machine, device or thing he or she is to use or operate or the physical condition of the workplace or the part thereof in which he or she works or is to work is in contravention of this OHSA or the regulations and such contravention is likely to endanger himself, herself or another employee.

37. Management shall promptly investigate or arrange for the investigation of the report by an employee of a hazardous or dangerous condition that meets the conditions as outlined above.
38. An employee shall promptly report to their immediate (or first available) supervisor the circumstances of their refusal to work.
39. The supervisor shall ensure and clarify that the report, is health and safety related; not a concern or complaint; and documented.
40. The supervisor shall ensure the employee remains in a safe place near their workstation.
41. The refusing employee is not to be assigned other work. No employee is to be assigned the work activity involved in the refusal.
42. The supervisor shall notify and immediately make available an employee committee member to be present for the investigation.
43. The supervisor shall ensure that the refusing employee and employee representative are present during the investigation.
44. The supervisor shall (at their discretion) request technical and special assistance (i.e., maintenance, human resources, etc.) to investigate the work refusal.

45. The supervisor shall provide all reasonable and pertinent information to the employee during the investigation and shall, where a hazardous or dangerous condition exists, *correct the condition immediately* given the circumstances.
46. Where an employee has *reasonable grounds* to continue to believe that a hazardous or dangerous condition still exists following the investigation, or following correction of the condition the supervisor shall, document the employee's reasonable grounds for the continued work refusal; arrange for reasonable alternate work for the employee; and *contact the SHS immediately regarding the continued refusal*.
47. Another employee may be asked to perform the work activity involved in the refusal but only in the presence of an employee representative. The employee may decline.
48. The SHS shall immediately notify an Inspector of the continued work refusal and shall immediately attend the investigation.

The Right to Stop Work by Certified Members

These requirements apply to a request for an investigation by a certified committee member who has reason to believe that *dangerous circumstances* exist, or where a certified member receives a complaint that *dangerous circumstances* exist and the *dangerous circumstances* meet the definition outlined in subsection 44(1) of the OHSA.

Dangerous circumstances means a situation in which:

- a provision of the OHSA or Regulations is being contravened;
- the contravention poses a danger or a hazard to an employee; and
- the danger or hazard is such that any delay in controlling it may seriously endanger an employee.

49. Employees shall promptly report all hazardous or dangerous conditions to their immediate supervisor or to an available supervisor.
50. A certified member shall promptly report the existence of *dangerous circumstances*, of which the member is aware, to a supervisor.
51. The supervisor shall promptly investigate the report in the presence of the certified member.
52. Following the investigation and any steps taken to resolve the matter, the certified member may request the presence of a *second certified member* (representing the other workplace party) to investigate the matter if *dangerous circumstances* continue to exist following the initial investigation.
53. The second certified member shall promptly investigate the matter in the presence of the first member.
54. If both certified members agree that *dangerous circumstances* exist, the SHS shall be notified and shall stop the work or the use of any

equipment, machinery, etc. that is causing the *dangerous circumstances*.

55. The Corporation will correct or take steps to correct the situation that caused the *dangerous circumstances*.
56. Following correction of, or steps taken to correct the *dangerous circumstances*, the SHS will request the certified members or an inspector to cancel the direction to stop work.
57. Where the certified members do not agree whether *dangerous circumstances* exist, the SHS shall be notified immediately.
58. The SHS shall immediately notify an Inspector of the certified members' disagreement and shall immediately attend the investigation.

GUIDELINES
FOR THE
STRUCTURE AND FUNCTION
OF THE
CORPORATE MANAGEMENT STEERING COMMITTEE

CORPORATION OF THE CITY OF WINDSOR
Windsor, Ontario, Canada

STRUCTURE AND FUNCTION
OF THE
CORPORATE MANAGEMENT STEERING COMMITTEE

PREAMBLE

The Occupational Health and Safety Act (OHSA) requires an employer to develop an Occupational Health and Safety program to implement the written policy statement. As one of its ongoing efforts to improve the work environment, the Corporation is moving to a co-coordinated corporate approach to Occupational Health and Safety. It is our belief that this approach will provide a more consistent application of standards, promote a more consistent level of compliance to legislation expectations and therefore result in a healthier and safer workplace.

It is also our belief that clearly established organizational and personal roles, responsibilities and goals will result in a more improved and effective Occupational Health and Safety Program.

Corporate Management Steering Committee (CMSC)

1.0 Structure of the CMSC

The CMSC shall consist of _____ members representing each of the following departments:

Membership is limited to department heads, or designates. The Chief Administrative Officer (CAO), or designate shall chair the CMSC. The CMSC shall meet on a regularly established schedule as follows:

Changes will be approved by the CMSC.

The CMSC may invite any person(s) to attend meetings to provide pertinent information.

The Supervisor of Health and Safety (SHS) shall act as a resource to the CMSC and its members.

2.0 Role of the CMSC

The CMSC is an advisory body and its function shall be as follows:

- To facilitate the implementation of the Occupational Health and Safety (OHS) Program Project;
- To facilitate departmental transition into a corporate focused OHS program;
- To assist in the identification, resolution and improvement of quality assurance issues related to the OHS Program Project; and
- To actively promote and communicate the OHS Program Project status, initiatives and activities;
- To recommend approval of corporate safe work procedures; training and instruction programs; and communication strategies and programs for **Authorization by the CAO** to be distributed by Legal and Human Resources Department.

3.0 Role of the SHS

- report to, and advise the CMSC as to the status of the OHS Program Project;
- identify and report to the CMSC OHS Program quality assurance issues relating to implementation;
- identify and recommend resolutions and improvement to the OHS Program infrastructure and quality assurance issues.

4.0 Minutes of Meetings

The CMSC will maintain minutes of its meetings, and be responsible for having the minutes types and circulated within five (5) working days of the meeting. Minutes will be signed by the Chair and circulated to all members and copies provided to:

- Departmental Committees;
- Central Committee; and
- All divisions (to be posted where they will come to the attention of employees).

5.0 Quorum

The committee shall have a quorum of four (4) members present, plus the SHS in order to conduct business.

6.0 Meeting Agenda

The SHS will prepare the agenda for CMSC meetings, and forward a copy of the agenda to all CMSC members at least one week in advance of the meeting. Members should contact the SHS with items to be included on the agenda. The CMSC may accept any item as proper for discussion pertaining to the committee's role. Items raised from the agenda in meetings will be dealt with on the basis of consensus. Formal motions will not be used.

All resolved or not resolved items will be reported in the minutes. Unresolved items will be placed on the agenda for the next meeting.

7.0 General

All issues regarding the OHS Program Project implementation, maintenance or monitoring are first expected to be discussed at the department/division level with the SHS prior to the CMSC considering involvement.

8.0 Amendments

Any amendments, deletions or additions to these guidelines must have the consensus of the committee, and shall be set out in writing as an appendix.

9.0 Management Working Committees

The CMSC will, as the need arises, or upon the recommendation of the SHS, form **Management Working Committees (MWC)**.

The purpose of MWC is to:

- provide operational input from divisions;
- provide a practical consultation framework; and
- provide divisional expertise

to the Legal and Human Resources Department for the development of the **Corporate Occupational Health and Safety Program**.

Structure/Membership

MWC shall:

- consist of membership representative of Operating Divisions affected by the work procedure, and approved by the CMSC.
- be chaired by the SHS, or designate.
- invite any person(s) to attend meetings to provide pertinent information.
- meet on a schedule as determined by the MWC.
- conclude their business on a date as determined by the CMSC.

Role of the MWC

MWC are an advisory body and their function is as follows:

- provide information and expertise regarding division operational needs
- assist in identifying divisional quality assurance issues
- provide input to LHR Department in the development and implementation aspects of a **safe work procedure**.

Role of the SHS

- facilitate MWC activities;
- report to, and advise the CMSC as to the status of MWC activities; and
- report to, and advise the CMSC as to quality assurance issues;

Minutes of Meetings

MWC will maintain Minutes of their meetings. Minutes will be provided to the CMSC.

Operating Parameters

The CMSC will establish the mandate, and parameters of each MWC.

SAMPLE AGENDA

Date:

Time:

Location:

AGENDA

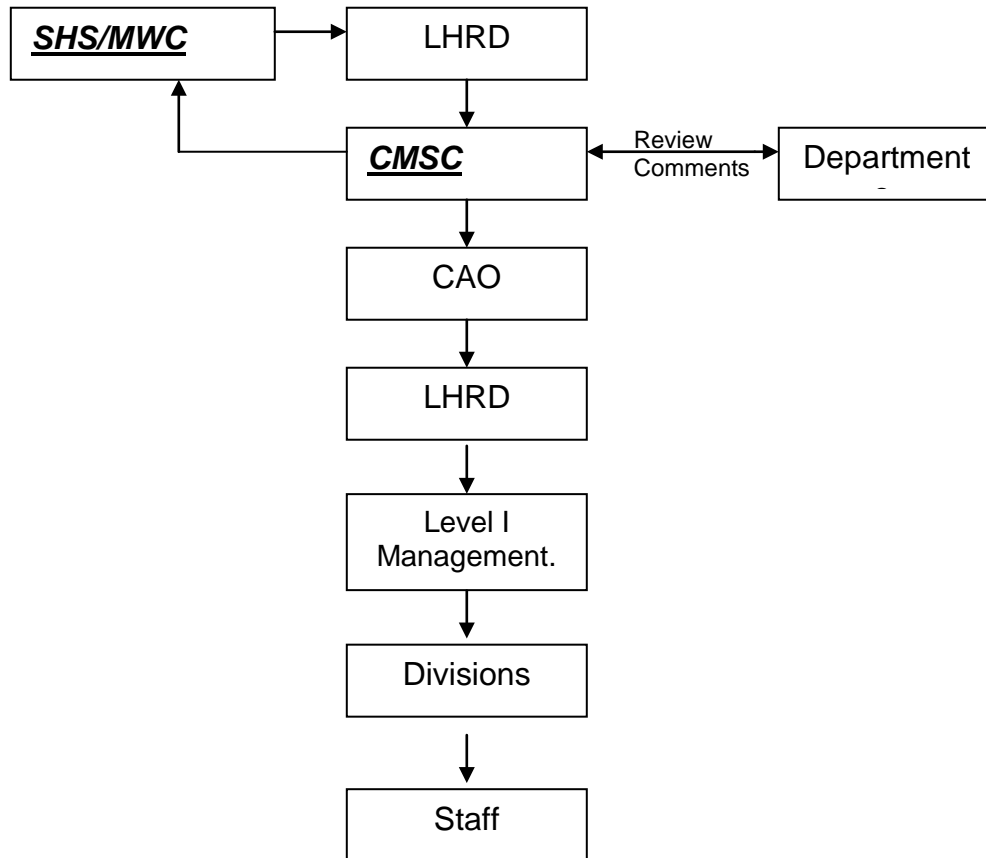
1. Call to order
2. Minutes of the last meeting
3. Unfinished business
4. Regular reports
5. New business
6. Date of next meeting
7. Adjournment

SAMPLE AGENDA ITEMS

- Date
- Time of meeting
- Location of meeting
- Review of last meeting's minutes
- Changes or omissions in the last meeting's minutes
- Approval of last meeting's minutes
- Unfinished business
- Accident/incident review
- Internal/external reports
- Training
- New business
- Adjournment

DEVELOPMENT, REVIEW, APPROVAL
AUTHORIZATION AND DISTRIBUTION

FLOW CHART



- CAO - Chief Administrative Officer
- SHS - Supervisor of Health and Safety
- HRD - Human Resources Department
- MWC - Management Working Committee
- CMSC - Corporate Management Steering Committee

NOTE: Review, Approval and Authorization cycle is approximately 4 weeks.

ALLEGED REPRISALS

PROCEDURE

The following procedure applies where an employee makes an allegation that the Corporation, or a person acting on behalf of the Corporation, has taken an action or reprisal against him/her, where the employee has acted in compliance with, or sought enforcement of the *OHSA or regulations*; or acted in compliance with, or sought enforcement of the *Corporate OHS Program*.

1. The matter shall be promptly investigated by the Supervisor of Health and Safety (or *Designate*).
2. Where the investigation determines that a person acting on behalf of the Corporation has taken any action or reprisal, or threatened to take any action or reprisal against an employee (for the reasons stated) then that person will be held accountable by the Corporation; and
3. Where an employee is not satisfied with the Corporation's investigation, or the steps taken to deal with the circumstances of the matter, then the employee may exercise any appropriate rights under the applicable collective agreement.
4. Nothing in this procedure is meant to prevent or prohibit an employee from initiating a complaint to the Ministry of Labour under *section 50 of the OHSA*.

Reference: OHSA section 50.

DISCIPLINE AND ENFORCEMENT

POLICY

The Corporation of the City of Windsor (Corporation) is proud of its tradition of a professional work environment that promotes occupational health and safety; and prohibits unsafe and unhealthy... work conditions, practices and activities. These types of workplace conditions, practices and activities are unacceptable and will not be tolerated. All reasonable precautions and efforts will be taken to prevent and effectively deal with non-compliance related to provisions of the *Occupational Health and Safety Act (OHSA)* and *regulations*; and the requirements of the *Corporate Occupational Health and Safety (OHS) Program*.

PURPOSE

The purpose of these requirements is to provide a standardized and effective corrective action mechanism for... employee OHS performance related to non-compliance with Corporate OHS Program policies, procedures and work instructions; and non-compliance with the *OHSA and regulations*.

SCOPE

These requirements apply to all Corporation employees.

Definitions

Corporation – means the Corporation of the City of Windsor.

Employee – means a person employed by the Corporation, and includes management and supervision.

Management – means the CAO, General Managers, and Executive Directors as identified in the Corporate OHS Organizational Structure.

Supervision – means front-line authority as identified in the Corporate OHS Organizational Structure.

Workplace – land, facilities and premises including mobile equipment and vehicles being utilized by the Corporation and its employees.

RESPONSIBILITY

Employees

Responsible to:

- Comply with these requirements;
- Promote a safe and healthy working environment; and
- Comply with applicable provisions of the *OHSA and regulations*; and applicable requirements of the Corporate *OHS Program*.

Supervision

Responsible to:

- Comply with these requirements;
- Promote a safe and healthy working environment;
- Comply with, and enforce the applicable provisions of the *OHSA and regulations*; and applicable requirements of the Corporate *OHS Program*.
- Monitor and manage employee OHS performance; and monitor compliance with these requirements.

Management (CAO, General Managers, Executive Directors)

Responsible to:

- Ensure that the Corporation is in compliance with these requirements; and
- Monitor and manage employee OHS performance.

PROCEDURE

General

- i) Management and supervision are required to comply with their duties and responsibilities under the *OHSA and regulations*; and the applicable requirements of the *Corporate OHS Program*;
- ii) Employees are required to comply with their duties and responsibilities under the *OHSA and regulations*; and the applicable requirements of the *Corporate OHS Program*.
- iii) Management and supervision are required to monitor and manage employee OHS performance and Departmental compliance to Corporate OHS Program standards.
- iv) Employees are responsible, and will be held accountable for any act, or neglect or failure to act where the employee is aware of:
 - a danger or hazard;
 - a provision of the *OHSA or regulations*; or
 - a requirement of the *Corporate OHS Program*.
- v) No employee will be held accountable for any act, or neglect or failure to act where the employee is not aware of:
 - a danger or hazard;
 - a provision of the *OHSA or regulations*; or
 - a requirement of the *Corporate OHS Program*.
- vi) Compliance with Corporate OHS Program standards will be managed through a combination of employee performance management and corrective action that will include:
 - a. Management *documented* identification of deficient or substandard activities, work practices or performance; or non-compliance to a provision or requirement of the OHSA and regulations; or Corporate OHS Program standard(s); and

Management *documented* review and re-instruction, with the employee, of the appropriate and applicable provision or requirement of the OHSA or regulations; or Corporate OHS Program standard(s).

- vii) Enforcement will be maintained through the following *progressive discipline steps* that include, but are not limited to:
 - a. verbal warning – first offence;
 - b. written warning – second offence;
 - c. progressive suspension – third offence; or
 - d. employee termination.
- viii) Where an employee has committed a contravention of the *OHSA or regulations*; or contravened a requirement of the *Corporate OHS Program* and that contravention is, in the opinion of the Corporation, deemed to be of such a serious nature, these *progressive discipline steps* may be accelerated up to, and including employee termination.
- ix) The Corporation will provide opportunities for employee training and instruction in Corporate OHS Program standards.
- ix) The Corporation, or any person acting on behalf of the Corporation, will not take any action or reprisal, or threaten to take any action or reprisal against an employee, because the employee has acted in compliance with, or has sought enforcement of these requirements.

MANAGEMENT COMMUNICATION

Policy

It is the policy of the Corporation to ensure and require that an effective training and communication process is established and maintained under the OHS Program. The Corporation acknowledges its responsibility to health and safety at the workplace, and will effectively promote, communicate to, and train employees in the provisions and requirements of the OHS Program.

Purpose

The purpose of these requirements is to ensure and require that a regular training and communication process is established and maintained; and that OHS Program requirements are communicated to employees;

Scope

The OHS Program training and communication process will set out the minimum requirements for training and communication and applies to all Corporation employees.

Definitions

Corporation – means Corporation of the City of Windsor

Employee – means a person employed by the Corporation, and includes managers, and supervisors.

Workplace – land, facilities and premises including mobile equipment and vehicles being utilized by the Corporation and its employees.

Responsibilities

Employees

Responsible to:

- Comply with these requirements; and
- Attend all applicable, and scheduled training and communication sessions.

Managers and Supervisors

Responsible to:

- Comply with these requirements;
- Deliver scheduled OHS Program communication sessions to employees under their supervision;
- Ensure, to the extent possible, that each employee attends applicable and scheduled training and communication sessions; and
- Monitor employee compliance and performance to these requirements

Executive Directors

Responsible to:

- ensure that the Corporation is in compliance with these requirements; and
- monitor and manage employee compliance and performance to these requirements.

Procedure

General

- i) All levels of Management are required to comply with their responsibilities and all applicable provisions and requirements of the OHS Program;
- ii) Employees are required to comply with their responsibilities and all applicable provisions and requirements of the OHS Program;
- iii) All levels of Management are required to monitor and manage employee OHS performance and compliance to these requirements;

- iv) The Health & Safety Division shall develop a Training and Communication Plan based on a Training Needs Analysis;
- v) The Training Needs Analysis will consider the following:
 - general health & safety skill requirements for employees; and
 - specific health and safety skill for *specific* employee classifications.
- vi) The Plan shall be developed, in consultation with a Working Committee, and approved for distribution by the SMT;
- vii) The Health & Safety Division shall develop a master list of deliverable OHS Program *monthly* communication topics;
- viii) The master list shall be developed, in consultation with the Working Committee, and approved for distribution by the SMT;
- ix) The master list shall be distributed to the respective Departments/Divisions by the Health & Safety Division;
- x) Each Department/Division shall develop a communication schedule that lists the OHS topics to be delivered *monthly* to employees;
- xi) All schedules shall be approved by the SMT;
- xii) Schedules shall be provided to each Departmental Committee and posted in departmental workplaces where they will come to the attention of employees; and
- xiii) Employee attendance and delivery of monthly communication sessions will be documented.

PHYSICAL CONDITIONS INSPECTIONS

Policy

It is Corporation policy to ensure and require that regularly scheduled *physical conditions inspections* are conducted and carried out in all Corporation workplaces. This OHS Program Element will assist in promoting, communicating and demonstrating the Corporation's commitment to workplace health and safety. These inspections will serve as an important evaluation tool and measurement for the OHS Program continuous improvement process.

Purpose

The purpose of these requirements is to ensure and require that a physical conditions inspection process is established, implemented and maintained that will reduce the potential for injury, illness and loss, and:

- ensure the workplace receives regular physical conditions inspections;
- identify substandard activities and conditions;
- evaluate these activities and conditions to established OHS Program requirements; and
- ensure effective *root cause* corrective action is implemented and maintained to *control* identified substandard practices.

Scope

The OHS Program physical conditions inspection process will set out the minimum requirements for workplace inspections by managers, supervisors and Committee members.

Responsibilities

Employees

Responsible to:

- Comply with these requirements; and
- Co-operate with, and provide all requested and applicable documentation and information, to inspection team members.

Managers and Supervisors

Responsible to:

- Comply with these requirements;
- Co-operate with, and provide all requested and applicable documentation and information, to inspection team members.

- Conduct scheduled physical conditions inspections;
- Assist in implementing applicable corrective action controls for identified substandard practices;
- Ensure corrective action complies with established OHS Program requirements;
- Regularly monitor and evaluate implementation and maintenance of controls; and
- Communicate inspection summaries to the Health and Safety Division, Committees and post copies in the department/area where they will come to the attention of employees.

Executive Directors

Responsible to:

- ensure that the Corporation is in compliance with these requirements; and
- monitor and manage employee compliance and performance to these requirements

Procedure

General

- i) Managers, and supervisors are required to comply with their responsibilities and all applicable provisions and requirements of the OHS Program;
- ii) Employees are required to comply with their responsibilities and all applicable provisions and requirements of the OHS Program;
- iii) Managers, and supervisors are required to monitor and manage employee OHS performance and compliance to these requirements;
- iv) The Health and Safety Division, in consultation with the Departmental Committees, will develop the physical conditions inspection process and determine the frequency of those inspections;
- v) The Health and Safety Division, in consultation with the Departmental Committees, will develop *inspection checklists and a follow-up process*;
- vi) The inspection and follow-up process will be approved by the CMSC;

- vii) Departmental workplaces will be inspected by all levels of Departmental Management pursuant to an annual schedule and frequency established and approved by the General Manager;
- viii) The Departmental schedule will be provided by the General Manager (or designate) to the Health and Safety Division;
- ix) Departmental Committee members designated to inspect the workplace will conduct the inspection at least *monthly*, pursuant to the *Committee Operating Guidelines*;
- x) Physical conditions inspections will be documented on the *approved* forms, and distributed to:
 - the Health and Safety Division;
 - the Departmental Committee;
 - the Central Committee; and
 - the Department/Division.
- xi) Inspection Checklists will be completed by the individual, or team, conducting the inspection and must identify the *substandard practice and priority rating*;
- xii) The Department/Division Manager will determine the *corrective action, target date and assigned responsibility* for identified substandard practices. This information will be communicated to:
 - the Health and Safety Division;
 - the Departmental Committee; and
 - the Central Committee.
- xiii) *Priority Ratings* will assigned as follows:
 - **HIGH...** means the *substandard practice* has the potential to cause injury or illness resulting in a *lost time case*.
 - **LOW...** means the *substandard practice* has the potential to cause injury or illness resulting in a *first-aid or medical attention*.
- xiv) An identified substandard practice that is a repeat item (from a previous inspection) will be assigned a *Red Flag*; and
- xv) *Red Flag* items will be forwarded to the CMSC for review and consideration.

COMPLIANCE ACTIVITY PLAN

COMPLIANCE ACTIVITY	ACTION PLAN	STATUS (dd/mm/yy)				RESPONSIBILITY
		Start Date	Original Target Date	Current Target Date	Completion Date	
CONFIRM AND PROVIDE DETAILS THAT THE EQUIPMENT, MATERIALS AND PROTECTIVE DEVICES REQUIRED BY THE PROCEDURE ARE AVAILABLE AND PROVIDED TO EMPLOYEES						
CONFIRM AND PROVIDE DETAILS THAT THE EQUIPMENT, MATERIALS AND PROTECTIVE DEVICES REQUIRED BY THE PROCEDURE WILL BE MAINTAINED IN GOOD CONDITION						
CONFIRM AND PROVIDE DETAILS THAT THE PROCEDURE AND ITS REQUIREMENTS WILL BE COMMUNICATED TO ALL MANAGEMENT LEVELS						
CONFIRM AND PROVIDE DETAILS THAT THE PROCEDURE AND ITS REQUIREMENTS WILL BE COMMUNICATED TO ALL EMPLOYEES						
CONFIRM AND PROVIDE DETAILS OF THE IMPLEMENTATION PROCESS FOR THE PROCEDURE AND ITS REQUIREMENTS						
CONFIRM AND PROVIDE DETAILS OF THE AUDIT PROCESS FOR THE PROCEDURE AND ITS REQUIREMENTS						

Department/Division: _____

Issue Date: _____
Revision Date: _____