



Public Services Health
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Occupational Health and Safety Management Systems Accreditation Standard Consultation Response



**Occupational Health and Safety Management Systems
Accreditation Standard Consultation Response**

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VOLUNTARY OHSMS ACCREDITATION CONSULTATION RESPONSE

EXECUTIVE SUMMARY

To prepare this response, PSHSA conducted a survey to allow our stakeholders to share their feedback and input on the draft policy. We received 144 survey responses representing various sectors. PSHSA also conducted an open focus group that had 21 participants from across all sectors and engaged our education advisory committee in an additional focus group.

This document summarizes our feedback and recommendations for the proposed policy. In particular, this includes our perspectives on the specific questions outlined in the consultation documentation including:

- The Importance of Accreditation
- Current OHSMS Implementation Practices or Plans
- Benefits of Accreditation
- Barriers to Accreditation
- Required Supports to Achieve Accreditation
- Employer Accreditation
- Suggested Changes to the Standard

Summary of Recommendations

The following recommendations are being offered for consideration when finalizing the Voluntary Occupational Health and Safety Management System (OHSMS) Accreditation and Employer Recognition Program for Ontario Workplaces

- Ensure there is allowance for equivalency related to existing and accepted accreditation or OHSMS standards and clearly communicate the alignment with these standards.
- Provide clarity on expectations for different sized businesses and/or industries, or identify equivalent standards
- Allow for equivalency submissions and allow audit reports from identified and accepted accreditation programs instead of completion of additional MOL specific paperwork
- Chief Prevention Officer (CPO) establishes a consistent process and certifies authorized experienced auditors to act on behalf of the CPO for accreditation.
- Offer funding or other incentives to encourage participation in the voluntary standard.
- Establish and communicate submission process, timeframes (including correction of non-conformities) and renewal process.
- Clearly communicate alignment with other accreditation/OHSMS Standards
- Ensure that a process is established for independent third party verification of OHSMS against the standard. This verification process should be focused on correction of non-conformities related to the standard and not punitive. The

verification process needs to ensure compliance with legislative requirements and safety standards.

- Ensure that standards are set to ensure concise submission and verification processes for employer recognition that are time efficient.
- Consider inclusion of a verification stage with workers prior to recognition of the employer by the CPO
- Provide more detail in the process pertaining to who will assess, what process will be used and how consistency will be ensured when recognizing employers

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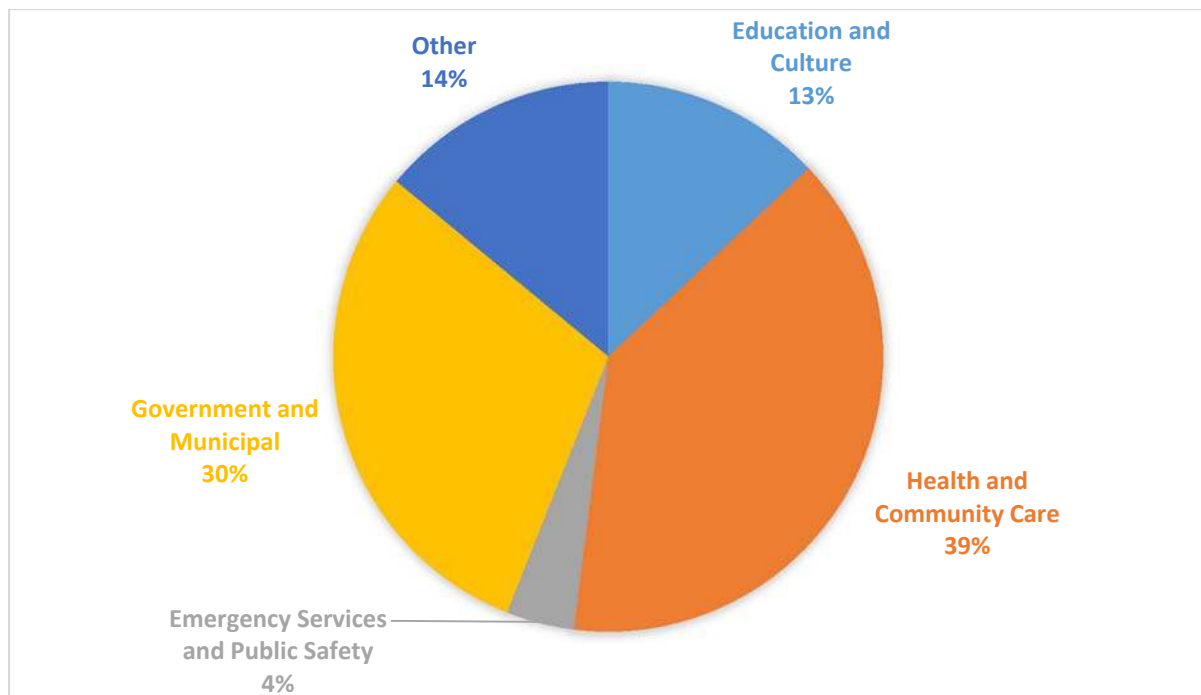
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PROCESS AND DEMOGRAPHIC INFORMATION

PSHSA conducted a survey to allow our stakeholders to share their feedback and input on the draft Accreditation policy. We received 144 survey responses representing various sectors. PSHSA also conducted an open focus group that had 21 participants from across all sectors and engaged our education advisory committee in an additional focus group. The survey and focus groups were promoted to stakeholders through social media and our staff. PSHSA shared the Ministry of Labor draft Standard and Background and Question documents prior to inviting stakeholders to participate in an online survey or take part in a focus group.

SECTOR REPRESENTATION

PSHSA represents the health and community care sector, government and municipal, education and culture and the emergency services and public safety sectors. Representatives from all of these sectors participated in the consultation process. Below is a chart that identifies the percentage of participation from each of these groups

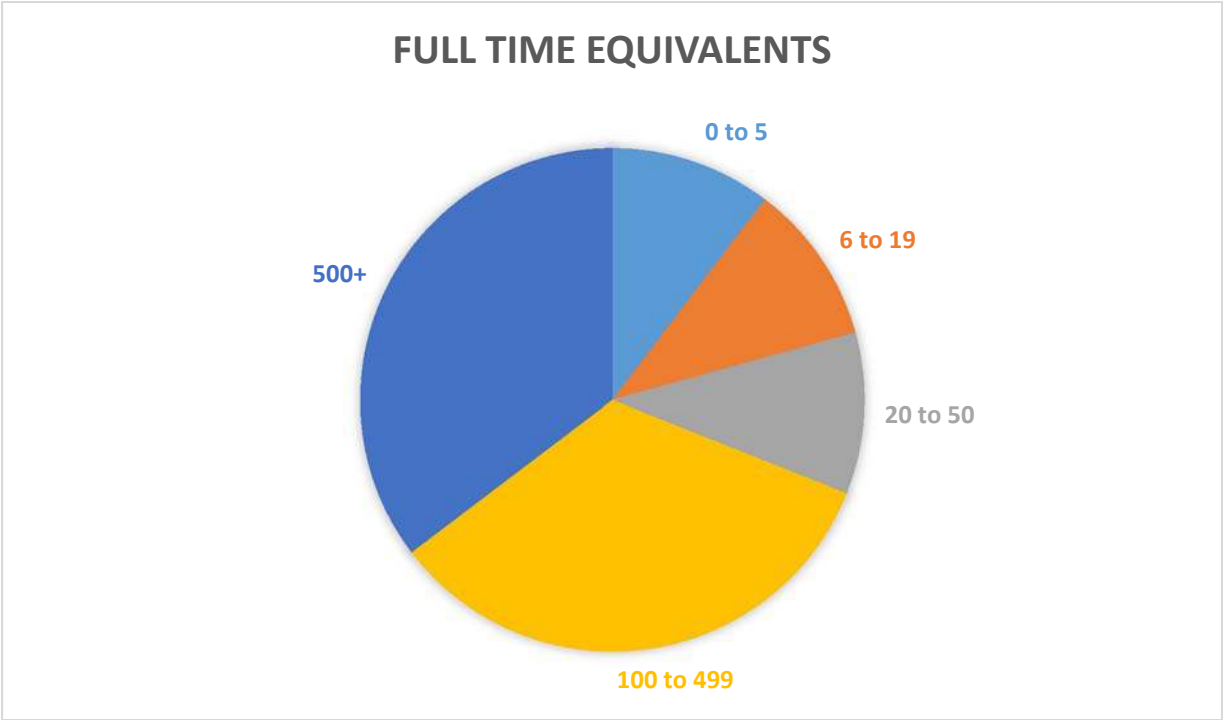


Additional sectors who classified themselves as “other” included:

- Manufacturing
- Construction
- Childcare
- Consulting Firms
- Youth custody, addiction and community services
- Child Welfare
- Hospitality
- Charities
- Retail
- Food Services
- Oil and Gas
- Retired Persons

SIZE OF ORGANIZATION

Most of the survey respondents represented organizations that regularly employ 100 or more full time equivalents. 30% of respondents represented organizations with 500 or more full time equivalents and 28% of respondents represented organizations with 100-499 full time equivalents.



ORGANIZATIONAL ROLES

Of those who participated in the survey 39% identified themselves as a Senior Manager, 32% as a Manager or Supervisor and 20% as a worker. An additional 13% identified themselves as “other” which included such titles as health and safety professional, administrative, coordinator, teacher, human resources professional and owners of a company.

ASSOCIATION REPRESENTATION

We also had 10% participation from associations that represent employers and 8% participation from associations representing workers. Associations that chose to identify themselves included Ontario Public Services Employee Union, Ontario Secondary School Teachers Federation, and the Peel Regional Police Association.

Note: Some PSHSA clients provided feedback on the Standard through other mechanisms such as their labour or employer associations.

CONSULTATION QUESTIONS

TOPIC 1: ELEMENTS OF THE VOLUNTARY OHSMS ACCREDITATION STANDARD

This topic area covered three key areas:

1. Are there any additional elements that you would like to see included in the standard?
2. Are there any elements you would like to see removed from the standard?
3. Does the draft standard provide sufficient flexibility for developing and implementing an OHSMS at workplaces of all sizes and for all business sectors? If not, how could it be amended to allow for implementation within all sized workplaces and industry types?

A few participants questioned why the CPO would be establishing their own specific OHSMS accreditation standard when there are known and widely accepted standards already in existence. Participants identified that the CPO should focus on having organizations achieve and be recognized for obtaining existing and validated OHSMS standards. It was also identified that the voluntary nature of the standard may reduce the number of workplaces who are interested in pursuing the standard and participants felt that an incentive might be required to encourage participation.

Flexibility of the Standard

31% of participants felt that the draft standard provides sufficient flexibility for development and implementation of OHSMS at workplaces and sizes of all businesses. This may be low because of the lack of information about process and submission requirements.

General comments on how to improve implementation in all workplaces included the following suggestion:

- Identification of hazard programs and controls across sectors,
- Provide accreditation variances due to industry and size of company
- Use direct and simple language – Employers must “say”, “do”, “show”
- Allow companies to reduce the verbiage tied to the standards - limit to one page explanations. i.e Workplace Violence - here is the standard, here is how it is implemented, this is how we prove it is implemented, this is our evaluation and modification methods, this is done every # of years.
- Reduce financial and resource burden in process design

Additional Elements to be Included in the Standard

Participants liked that the standard is voluntary. Generally people felt the proposed process was clear and concise, however the following elements were identified for consideration:

- Establish and communicate degrees of compliance for particular organizations considering size and industry types
- Use accredited audit results from Canadian Standards Association (CSA), BSI Group, etc. that are known to align with the CPO Standard instead of requiring submission of additional paperwork
- Require annual conformance reports
- MOL inspectors conduct brief verification of program maintenance should they visit an accredited workplace
- Add a self-assessment audit prior to submission to the CPO
- Provide rebate funding to support further Occupational Health and Safety (OHS) improvements
- Establish timeframes and processes for submission as well as correcting non-conformances, length of validity and renewal process.

Topic 1: Summary of Concerns and Recommendations

In addition to the feedback provided in the report below are some specific concerns and recommendations heard from participants.

Concerns

Should the CPO be establishing an OHSMS Accreditation Standard when existing and accepted standards exist?

Lack of clarity on degrees of compliance and different requirements for different industries.

Additional paperwork required to submit to the MOL for approval, duplication of efforts already completed to meet other standard/accreditation requirements

The CPO should not be establishing an additional standard

Bottleneck for processing applications

Recommendations

Ensure there is allowance for equivalency related to existing and accepted standards.

Provide clarity on expectations for different sized businesses and/or industries, or identify equivalent standards

Allow for equivalency submissions and allow audit reports from identified and accepted accreditation programs instead of completion of additional MOL specific paperwork

Adopt or recognize existing OHSMS standards

CPO establishes a consistent process and certifies authorized experienced auditors to act on behalf of the CPO for accreditation.

Concerns

Incentive to participate is low/ lack of tangible incentives.

Lack of information about submission process, timeframes, correction of non-conformances and renewal process

Recommendations

Offer funding or other incentives to encourage participation in the voluntary standard.

Establish and communicate submission process, timeframes (including correction of non-conformities) and renewal process.

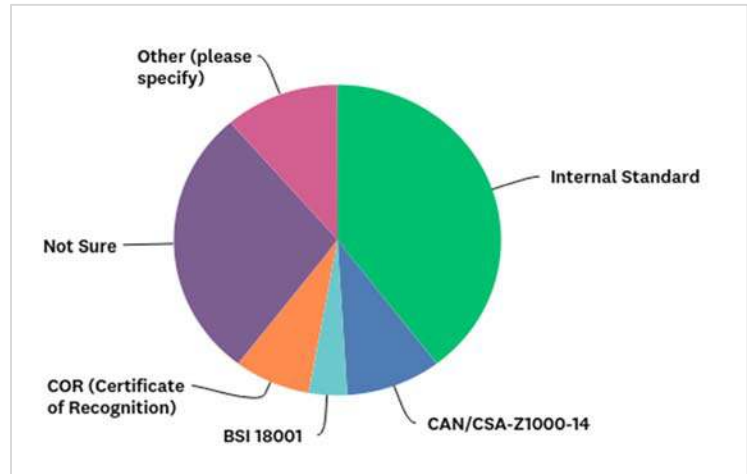
TOPIC 2: GENERAL QUESTIONS RELATED TO A VOLUNTARY OHSMS ACCREDITATION AND EMPLOYER RECOGNITION PROGRAM

This area of the consultation probed on a variety of broader topics including:

- If organizations had implemented an OHSMS and which one had been used, how has the organization been verified and what was the process that the organization had to undertake,
- Barriers for establishing and implementing OHSMS in an organization and what supports organizations would find valuable in order to establish and implement an OHSMS,
- What successful implementation of an accredited OHSMS should look like and how it should be verified,
- What should be included in an ongoing quality assurance and audit process for OHSMS Accreditation and employer recognition,
- Criteria that employers should be required to meet in order to receive CPO employer recognition,
- What should cause revocation of employer recognition status,
- What financial and non-financial incentives should be considered, and
- Health and safety requirements for contractors.

OHSMS Workplace Implementation

Less than half (45%) of the participants currently have an Occupational Health and Safety Management System (OHSMS) in their organizations, however 61% identified that they hope to implement an OHSMS in the next three years. For those who currently have an OHSMS most use an Internal Standard followed by CAN/CSA-Z1000-14 and then COR (Certificate of Recognition) and BSI 18001. Other identified standards include Safety Groups and Accreditation Canada (see chart right). Participants chose not to provide details on their existing OHSMS processes.



Importance of Accreditation

Generally it was felt that OHSMS Accreditation would move the safety responsibility beyond the safety professional to the whole organization and engage each level of management in proactive safety efforts.

68% of participants identified that *recognition by the Ministry of Labour CPO as an employer who successfully implemented an accredited OHSMS in their workplace and having their name published* would be important or very important to their organization. However, there may be a positive bias in these results. Participants identified that this was a challenging question to answer from an organizational perspective. Highlighting that while health and safety management would be important to them, (particularly if they held the role of a health and safety officer) the level of effort involved in the accreditation process may make it more challenging to garner the support and resources required to successfully implement an accredited OHSMS.

While 68% of participants identified being recognized as successfully implementing an accredited OHSMS in their workplace as being important or very important to their organizations, participants also identified that garnering support and resources to successfully implement an accredited OHSMS may be challenging.

Benefits and Barriers to Implementing an Accredited OHSMS in the Workplace

Benefits

Most participants felt that largest benefit that would be achieved by implementing an accredited OHSMS in their workplace would be increased participation in occupational health and safety programming within their organization followed by enhanced organizational reputation and increased worker moral.

Top 5 Benefits of Implementing an Accredited OHSMS

1. Increased participation in occupational health and safety within the organization
2. Enhanced organizational reputation
3. Increased employee morale
4. Increased employee retention
5. Improved business opportunities

Barriers

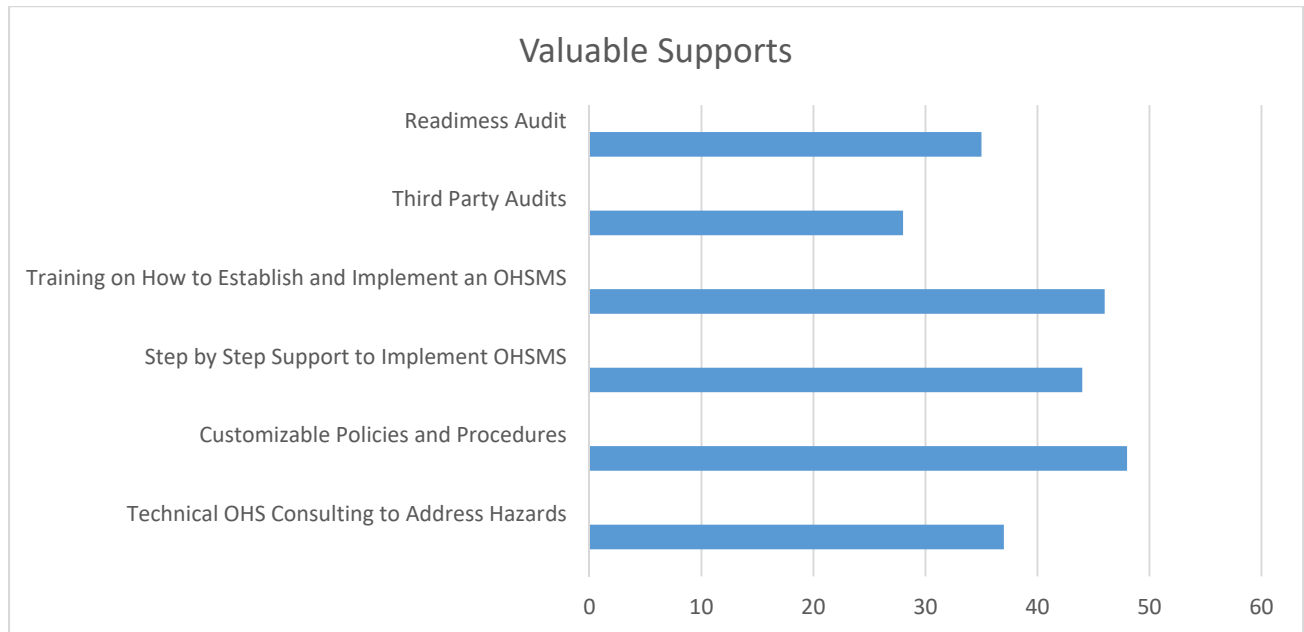
Time, people and financial resources were the top barriers to implementing an accredited OHSMS in the workplace and it was generally felt that there was a lack of clarity as to how long the accreditation from the Chief Prevention Officer/MOL would last and what the renewal cycle would be. This could be a barrier to getting internal buy-in and resources to support the process. Additionally participants identified that other certification/accreditation cycles may have to take priority (health care accreditation, COR) as they are vital to business operations and/or funding. Generally there was a lack of clarity on how these different accreditation systems might align with the Ministry or what the system might be to reduce duplication for workplaces who may be interested in submitting for approval.

Top 5 Barriers to Implementing an Accredited OHSMS

1. Time
2. People Resources
3. Financial Resources
4. Senior Leadership Commitment and Support
5. Technical skills

Valuable Supports

Participants (75 out of 144) identified the following supports that they felt would be most valuable in helping their organization implement an occupational health and safety management system. Participants were allowed to select multiple items.



Verification of Accredited OHSMS

Most participants felt that a tool should be used to conduct audits prior to submission for accreditation and that a third party onsite verification was necessary to determine alignment with criteria. It was felt that these third party audits could be conducted by “recognized” organizations with the required skill sets including suggestions of the MOL, WSIB, or Health and Safety Associations. They stressed however that this should not result in punitive action, but rather be focused on correction of non-conformities continuous improvement. It is absolutely necessary that an organization is recognized as being accredited be in compliance with legislative requirements and standards.

Quality Assurance for Audit Process for CPO OHSMS Accreditation

The following quality assurance suggestions were provided by participants for consideration:

- Conduct a full audit at a minimum of 3 years or a maximum of 5 years. It was recommended that the five year audit cycle should include a smaller interim review at 2 years.
- Include a full review of policies, procedures and training against the standard requirements.
- Provide mechanisms for ongoing internal audits such as a checklist of what the requirements are so that these can be completed by the Joint Health and Safety Committee and Management of organizations and improve level of engagement in the process

- Provide information on continuous improvement, optimal checkpoints and how to maintain the program
- Require submission of annual OHSMS review that includes proof that elements are reviewed regularly, signed and dated
- Provide a receipt of certificate or awards for those who receive accreditation

Criteria Employers Should Meet for Recognition by the CPO

It was recommended that the CPO utilize the CSA Z-1000 standard to establish criteria for employer recognition. It was suggested that injury rate and fatalities should be considered within the criteria for recognition but there was not a majority or consensus on this with only 30% of the participants selecting this item.

Top 5 Criteria Requirements for Employers to Achieve CPO Recognition

1. Demonstrated compliance with all legislative requirements (82%)
2. Proof of worker involvement in the implementation of the OHSMS (75%)
3. Regular third part audits (70%)
4. Proof of registration in good standing with the WSIB (64%)
5. No repeat orders for the same or similar contravention of the OHSA (52%)

Process for Employer Recognition

Most participants liked the proposed process for recognition of employers although there was a suggestion that the CPO needed to ensure that the process is concise and time efficient. Additionally it was felt that some sort of incentive may garner greater support for this program. There was a concern identified that no worker input was being sought prior to the employer receiving recognition, however others liked that it was an employer driven process. Finally more information was requested on who would assess the employer prior to recognition, what process would be used and what training these assessors would receive to ensure consistency.

Revocation of Employer Recognition

The following were identified as reasons that an employer should have their recognition revoked, in order of importance:

1. Failure of Audit, Does not maintain OHSMS
2. OHS Violation or Orders
3. Fatality or Increased Injury Rate
4. False Reporting
5. Lack of Sr. Leadership Commitment

Financial and Non-Financial Incentives

The following financial and non-financial incentives were identified by participants for consideration:

1. WSIB Premium Discount
2. General Financial Incentive
3. Rebate

4. Free Consulting Services to Implement
5. Logo to Use in Marketing
6. Finally, a few participants felt that no incentive should be provided, it is just the right thing to do as a business

Health and Safety Requirements or Policies for Contractors or Subcontractors

40% of respondents identified that they have health and safety requirements for contractors or subcontractors in their workplace and these requirements include:

- Policies for training, or proof of training
- All basics outlined in OHSA including safety requirements, violence, harassment, IPAC, WHMIS, and accident reporting
- Proof of WSIB coverage
- Demonstration of health and safety requirements during bidding process
- Pre-approval on contracting services, pre and post meetings, tailgate sessions depending on type of work
- COR
- Visitor and Contractor Safety (Sec. 24 CLWP OHS Manual -)
- Completion of a daily contractor hazard analysis form
- Proof of liability insurance
- Following health and safety policies, procedures and training requirements

Elements that should be Included or Removed from the Standard

The participants identified the following elements that should be included or removed from the standard.

Elements Suggested for Inclusion:

- Regular review by third party auditor
- Establish and maintain a process to ensure employees understand and report a contravention to the Act
- Establish, implement and maintain procedures or processes to report, investigate, record, analyze, document and maintain records for contravention reported
- The legal requirement to develop and implement workplace violence and harassment policies and procedures
- Establish and maintain JHSC/worker rep and fulfill requirements of Section 8 and/or 9 of the OHSA to promote the internal responsibility system
- Mandatory process for worker participation, engagement and involvement
- Competency of occupational health and safety coordinator, specialist or manager
- All elements of CSA Z1000 standard are included

Elements to be Removed Include:

4% of participants identified that the following two items should be removed from the standard.

- Establishing, implementing and maintaining procedures or processes to support management of change
- Establishing, implementing and maintaining procedures or processes for procurement

Topic 2: Summary of Concerns and Recommendations

In addition to the feedback provided in the report, below are some specific concerns and recommendations heard from participants.

Concerns

Lack of clarity on how different accreditation requirements may align with the CPO Accreditation standard

Self-declaration cannot be considered as the only verification process.

Concern about the efficiency and time it will take to become recognized as an employer

Lack of worker input in the employer recognition by CPO process.

Lack of information about who would assess the employer prior to recognition, what process would be used and what training would these assessors receive to ensure consistency.

Recommendations

Clearly communicate alignment with other accreditation/OHSMS Standards

Ensure that a process is established for independent third party verification of OHSMS against the standard. This verification process should be focused on correction of non-conformities related to the standard and not punitive. The verification process needs to ensure compliance with legislative requirements and safety standards.

Ensure that standards are set to ensure concise submission and verification processes for employer recognition that are time efficient.

Consider inclusion of a verification stage with workers prior to recognition of the employer by the CPO

Provide more detail in the process pertaining to who will assess, what process will be used and how consistency will be ensured when recognizing employers

ACRONYMS

Acronym	
COR	Certification of Recognition
CPO	Chief Prevention Officer
CSA	Canadian Standards Association
JHSC	Joint Health and Safety Committee
OHS	Occupational Health and Safety
OHSMS	Occupational Health and Safety Management System



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