

Internal Responsibility System

Healthcare Compliance Campaign 2026-2027

Facilitators:

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Housekeeping

- **Questions** – Use the Q&A feature on Zoom. We have turned off Chat
- **Access issues** – Connect with PSHSA at communications@pshsa.ca
- **For workplace compliance questions** – Connect with MLITSD Contact Centre
webohs@ontario.ca
Toll-free: 1-877-202-0008
TTY: 1-855-653-9260
- **Health and Safety program and compliance support resources** – go to www.pshsa.ca
- Participants will be notified by email when the webinar recording and PowerPoint are posted on the PSHSA website shortly after the presentation.

Pre Survey



- Voluntary [webinar survey](#)
- Please scan the QR code from you phone or click on the link provided

Speakers



Ministry of Labour, Immigration, Training, and Skills Development (MLITSD)

- **Jennifer (JJ) Stanley**, Provincial Specialist, Health Care Health & Safety Program, Occupational Health & Safety Branch, MLITSD
- **Eunice John**, Acting Senior Manager, Health Care Health & Safety Program, Occupational Health & Safety Branch, MLITSD

Public Services Health and Safety Association (PSHSA)

- **Jeremy Holden**, Health and Safety Consultant (Healthcare), Public Services Health and Safety Association (PSHSA)

About us



Prevention system
and research partner



10,000+ organizations



1.6m+ workers



Offering training, advisory &
applied, and product as a service



Internal Responsibility System (IRS) Campaign 2026/27

Presented by:

JJ Stanley and Eunice John

Provincial Health Care Health & Safety Program

Occupational Health & Safety Branch

Ministry of Labour, Immigration, Training and Skills
Development

Ministry of Labour, Immigration, Training and Skills Development

FAIR, SAFE AND HEALTHY WORKPLACES DIVISION



Our Vision

We envision an Ontario that is the most attractive place to work in the world because every employee is treated fairly and comes home safely.

Our Mission

We set, communicate and enforce legislation to help make Ontario workplaces fair, safe and healthy. Through our professionalism, innovation and collaboration, we earn and maintain the public trust.

Disclaimer

This information is provided as guidance only. It is not legal advice. It is not intended to replace the Occupational Health and Safety Act (OHSA) or the regulations and reference should always be made to the official version of the legislation.

MLITSD Internal Responsibility System (IRS) Campaign for 2026/27

- Campaign Rationale
- Dates and Sectors
- Inspection Focus
- What to Expect During an Inspection
- Enforcement and Compliance
- Resources



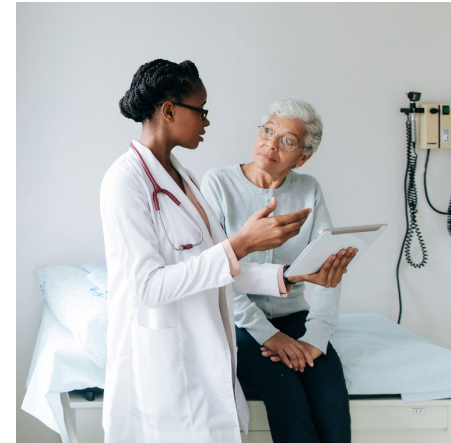
Source: Microsoft PowerPoint 2025

What is the Internal Responsibility System (IRS) Campaign?

- Health and safety inspection campaigns are part of MLITSD's commitment to meeting requirements outlined in our five-year occupational health and safety strategy, Prevention Works.
- The campaigns are intended to raise awareness of workplace hazards and promote compliance with the Occupational Health and Safety Act (OHSA) and its regulations.
- The [Occupational Health and Safety Act](#) (OHSA) establishes legal requirements that provide a foundation for the internal responsibility system (IRS).
- The Ministry is conducting a health and safety campaign focused on the IRS in Ontario's health and community care workplaces.

What is the Internal Responsibility System (IRS)?

- One of the primary purposes of the *Occupational Health and Safety Act* (OHSA) is to facilitate a strong internal responsibility system (IRS) in the workplace. To this end, the OHSA lays out the duties of employers, supervisors and workers.
- Simply put, the IRS means that everyone in the workplace has a role to play in keeping workplaces safe and healthy. Workers in the workplace who see a health and safety problem such as a hazard or contravention of the OHSA in the workplace have a statutory duty to report the situation to the employer or a supervisor. Employers and supervisors are, in turn, required to address those situations and acquaint workers with any hazard in the work that they do.



Source: Microsoft PowerPoint 2024

Campaign Rationale:

The IRS helps support a safe and healthy workplace. In addition to the workplace parties' compliance with their legal duties, the IRS is further supported by well-defined health and safety policies and programs.

IRS issues have been raised by stakeholders. In addition, in recent years:

- the ministry has received complaints from health care workplaces related to IRS concerns
- inspectors have written orders for IRS issues such as:
 - awareness training for both workers and supervisors under [O. Reg. 297/13](#)
 - orders for measures and procedures for workplaces that are covered under [O. Reg. 67/93](#)

An IRS focused initiative was last done in health care settings in [2018-2019](#).

When is the Campaign Occurring?

Phase 1: Compliance assistance

Dates: April 1, 2026 to March 31, 2027

The ministry is partnering with [Public Services Health and Safety Association](#) (PSHSA) to host webinar(s) on the campaign and provide compliance assistance resources.

Phase 2: Focused inspections

Dates: April 1, 2026, to March 31, 2027



Source: Microsoft PowerPoint 2025

Which Workplaces are Inspectors Visiting?

Health and community care services are provided in a variety of complex settings.

Workplaces from these seven subsectors are being visited as part of this campaign:

- Long-term care homes
- Retirement homes
- Hospitals
- Group Homes
- Home health care
- Treatment clinics and specialized services
- Professional offices and agencies



Source: Microsoft PowerPoint 2025

Inspection Focus

Inspectors will determine compliance with the *Occupational Health and Safety Act (OHSA)* and regulations.

Ministry inspectors will look for evidence of a strong IRS relating to:

- the duties and responsibilities of workplace parties
- training, including Awareness Training
- notices and reports

In addition, inspectors will look to ensure the internal check on the IRS by reviewing the functioning of the Health and Safety Representative (HSR) or Joint Health and Safety Committee (JHSC).



Source: Microsoft PowerPoint 2025

Preparation by Employers

An Inspector may ask the employer to provide any relevant or applicable documents for review, including, but not limited to, the following types of documents:

- Detailed incident reports for all injuries in the last 1-2 years
- Workplace inspection reports for the last year
- Health and safety policy and program to implement that policy
- Training documents, including supervisor and worker awareness training documentation

What to Expect During an Inspection

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- When the inspector arrives, they will ask to have a worker and an employer representative present.
- The inspector may conduct an administrative review and a physical inspection of the workplace. They may talk to workers and supervisors during the physical inspection.
- When an inspector observes a hazard or a contravention, they will determine what enforcement action to take. Most likely they will:
 - Have a discussion regarding what they have observed and assess if corrective action is underway.
 - Where non-compliance is observed determine the appropriate enforcement action to address the hazard or contravention or to require/demand information from workplace parties.
- At the end of the field visit, the inspector will present a field visit report. The report will include the findings and any actions taken.



Source: [Publications Ontario](#)

Duties and Responsibilities of Workplace Parties

The employer, typically represented by senior management, has the greatest responsibilities with respect to health and safety in the workplace and is responsible for taking every precaution reasonable in the circumstances for the protection of a worker. The employer is responsible for ensuring that the IRS is established, promoted, and that it functions successfully.

Employer duties include, but are not limited to:

- maintain any equipment, materials and protective devices provided – clause 25(1)(b)
- ensure that prescribed measures and procedures are carried out – clause 25(1)(c)
- acquaint a worker with any hazard in the work – clause 25(2)(d)
- 25(2)(e) assist joint health and safety committees and health and safety representatives to carry out their functions - clause 25(2)(e)
- when appointing a supervisor, to appoint a competent person - clause 25(2)(c)

Duties and Responsibilities of Workplace Parties (continued)

Competent Supervisors:

Clause 25(2)(c) of the OHS Act requires an employer when appointing a supervisor, to appoint a competent person.

Subsection 1(1) of the OHS Act defines “supervisor” and “competent person”.

- “supervisor” means a person who has charge of a workplace or authority over a worker.
- “competent person” means a person who,
 - (a) is qualified because of knowledge, training and experience to organize the work and its performance,
 - (b) is familiar with this Act and the regulations that apply to the work, and
 - (c) has knowledge of any potential or actual danger to health or safety in the workplace.

Duties and Responsibilities of Workplace Parties (continued)

Competent Officers and Directors:

Per Section 32 of the OSHA:

Every officer and director of a corporation must take all reasonable care to ensure that the corporation complies with the Act and regulations as well as with any orders and requirements of MLITSD inspectors, directors and the Minister.



Source: [Image Ontario](#)

Duties and Responsibilities of Workplace Parties (continued)

Supervisors

Supervisors are responsible for making workers fully aware of the hazards that may be encountered on the job or in the workplace; ensuring that they work safely, responding to any of the hazards brought to their attention, including taking every precaution reasonable in the circumstances for the protection of a worker.

Workers

Worker responsibilities include: reporting hazards in the workplace; working safely and following safe work practices; using the required personal protective equipment for the job at hand; participating in health and safety programs established for the workplace.

Training, including Awareness training

Inspectors will determine compliance with the [Occupational Health and Safety Act \(OHSA\)](#) and regulations. This may include, but is not limited to:

- providing information, instruction and supervision to workers to protect their health and safety – OSHA clause 25(2)(a)
 - If [O. Reg. 67/93](#) applies, this must be done in consultation with and in consideration of the recommendation from the JHSC or HSR - [O. Reg. 67/93](#) section 9(4)) .
- employers must ensure that workers and supervisors have basic occupational health and safety awareness training as soon as practicable for workers and within one week of performing work as a supervisor- [O. Reg. 297/13](#), s. 1(1) and s. 2(1).



Source: [Image Ontario](#)

Notices and Reports

If someone is killed or [critically injured](#) at the workplace, employers must immediately notify:

- the MLITSD Contact Centre at [1-877-202-0008](tel:1-877-202-0008) (operates 24/7)
- the joint health and safety committee or health and safety representative
- the union (if there is one)

Employers must provide a written report within 48 hours to the MLITSD, the joint health and safety committee, health and safety representative and trade union, if any, about the incident.

[O. Reg. 420/21](#) sets out specific information that must be included in the written report: [Learn how to submit a written report.](#)

Notices and Reports (continued)

Employers must submit a written notification if a person is injured and unable to do their usual work or requires medical attention because of an accident, explosion, fire or incident of workplace violence to the:

- joint health and safety committee or the health and safety representative
- union (if there is one)

The written notification must be given within four days of the incident.

Employers must submit a written notice if you are an employer and are advised that a worker (current or former) either:

- has an occupational illness
- has filed a claim for an occupational illness with the Workplace Safety and Insurance Board

Employers must submit the written notice within four days of being advised, to:

- the MLITSD
- the joint health and safety committee or health and safety representative
- the union (if there is one)

Reviewing the Functioning of the HSR/JHSC

Employers must ensure that a health and safety representative (HSR) is selected in workplaces where required in accordance with section 8(1) of the OHSA. Employers have a general duty under the OHSA to co-operate with the HSR to carry out their legislative functions under the OSHA.

Where required under subsection 9(4) of the OHSA, employers must establish and maintain a JHSC. Employers have a general duty under the OHSA to co-operate with the JHSC to carry out their legislative functions.

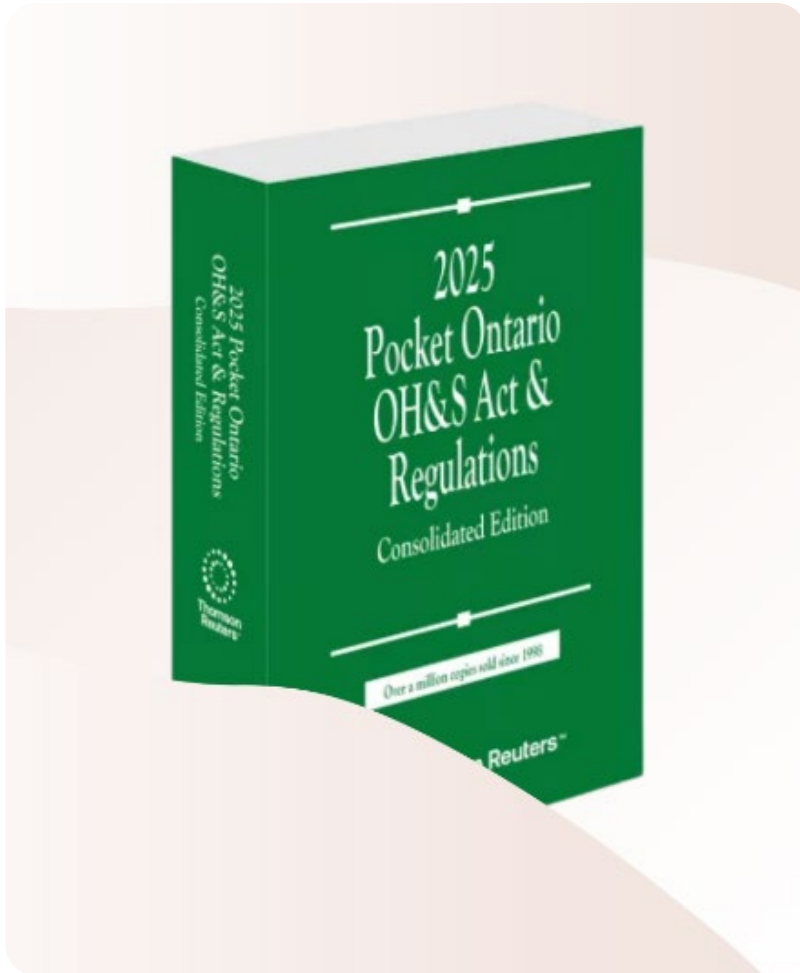
Employer duties include, but are not limited to:

- 9(20) responding to written recommendations from the JHSC/Co-Chair in writing within 21 days
- 9(22) maintaining and keeping minutes of meetings
- 9(26) ensuring that the JHSC inspects the physical condition workplace at least once per month
- 9(32) posting names and work locations of committee members
- 9(33) ensuring that the JHSC meets at least once every 3 months

MLITSD Resources

- [The internal responsibility system and the 3 rights of workers](#)
- [The internal responsibility system and the health care sector](#)
- [Joint health and safety committees and health and safety representatives](#)
- [Duties and responsibilities of supervisors](#)
- [Worker protections from reprisals against them by employers](#)
- [Posters required in the workplace](#)
- [Health and safety checklist](#)
- [Worker health and safety awareness in four steps](#)
- [Supervisor health and safety awareness in five steps](#)
- [Reporting workplace incidents and illnesses](#)
- [Health and safety training](#)

OHSA – Overview

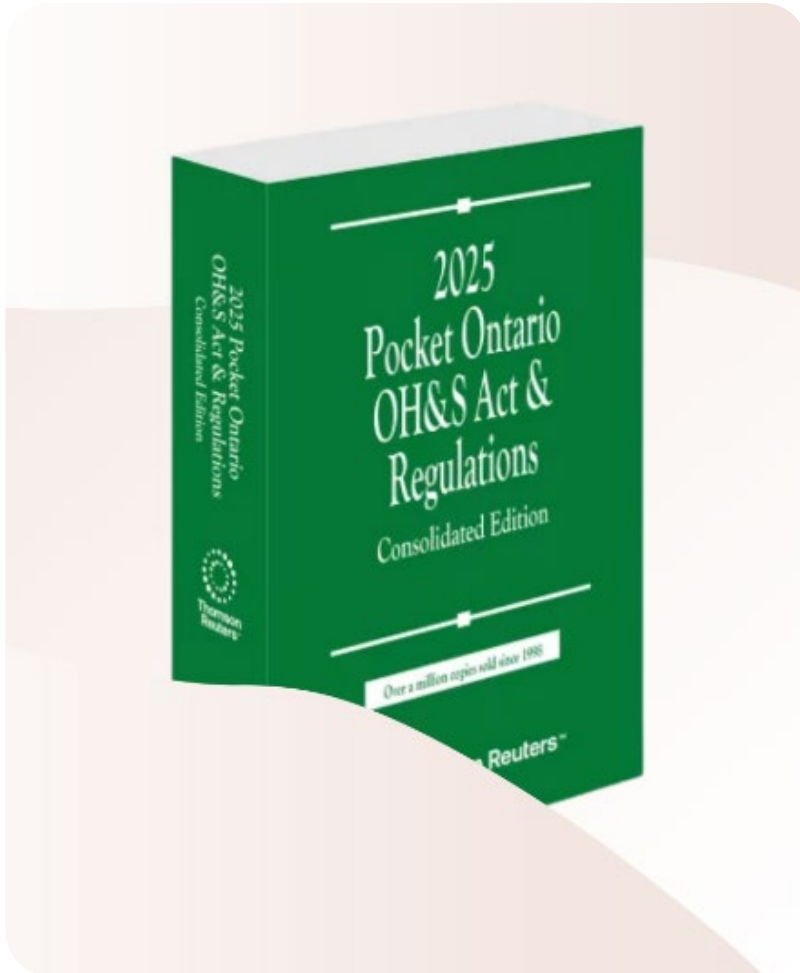


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Not sure where to start? [What is the OHSA?](#)

- The Occupational Health and Safety (OHSA) act is legal framework written to ensure employers keep workers safe.
- It sets out duties for all workplace parties and rights for workers to help establish a strong internal responsibility system (IRS) in the workplace.
- Requires establishing measures and procedures for dealing with workplace hazards.
- Allows the Ministry of Labour, Immigration, Training, and Skills Development (MLITSD) to enforce the law where compliance has not been achieved voluntarily.

OHSA – Roles & Responsibilities



Roles and Responsibilities – the OHSA sets out how workplace parties must meet their occupational health and safety roles and responsibilities

What is the OHSA?

- Roles and responsibilities (webinar)
- Board Members - Know Your Liabilities - PSHSA
- The Supervisor and occupational health and safety
- Physicians' occupational health and safety
- What is a Joint Health and Safety Committee (JHSC)?

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Small Business & New Workers



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Small Business – with fewer than 50 employees, these organizations often have limited time and resources to meet health and safety requirements.

- [Small Business Manual](#)
- [Small Business Policy and Procedure](#)

New, Young, and Vulnerable Workers – workers that are just entering the workforce or are new to a position, as well as vulnerable workers may require attention to ensure information, instruction and supervision protect them from injury or illness.

[New, Young, and Vulnerable Workers](#)
[Vulnerable Worker](#)

Health and Safety Awareness Training



Health and Safety Awareness Training – to comply with Regulation 297/13, this training provides an overview of the IRS, duties, and common hazards

[Worker Awareness Training](#)

[Supervisor Awareness Training](#)

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JHSC Training



Joint Health and Safety Committee (JHSC) Training – workplaces with 20 or more regular workers require a JHSC and at least 2 members certified.

[JHSC Part 1](#)

[JHSC Part 2](#)

[JHSC - Refresher](#)

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Leadership Training



Leadership Training – supporting leaders of an organization with learning legislative requirements and building health and safety competence.

[Health and Safety for Leaders](#) — 25% off for webinar attendees

[Board of Directors](#) — now free until September 30, 2026

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PSHSA Consulting Support



Consulting Services:

- ✓ Identify and manage health and safety hazards
- ✓ Review and recommend policies and procedures
- ✓ Applied services
 - Health and Safety Audits
 - Risk Assessments
 - Hazard specific support
 - Ergonomic Assessments

Reach out to a [Health and Safety Consultant](#) today!

PSHSA Consulting Support



Policy and Procedure Review – ensure your policies and procedures are up to date, accurate and meet legislative requirements. PSHSA Consultants will identify the need for specific revisions and if new policies are required.

This may include:

- ✓ An initial call
- ✓ Onsite visit
- ✓ Review of policies and procedures provided

Reach out to a **Health and Safety Consultant** today!

PSHSA Consulting Support



Health and Safety Audits - evaluate the effectiveness, reliability, and efficiency of your health and safety management system.

This may include:

- ✓ Document review
- ✓ Site observations
- ✓ Worker and Supervisor interviews

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PSHSA Consulting Support



Risk Assessments – identify, evaluate, and analyze potential hazards to determine appropriate measures to reduce or eliminate risk of injury or illness

This may include assessments of:

- ✓ Workplace Violence
- ✓ Slip, Trip, & Falls
- ✓ General Infectious Disease Risk
- ✓ Working at Heights

Reach out to a Health and Safety Consultant today!

PSHSA Consulting Support



Ergonomic Services – evaluate the way work is performed and provide guidance to minimize risk of injury and to help organizations design safer, more comfortable work environments.

This may include:

- ✓ Ergonomic Assessments
- ✓ Job Demands Descriptions
- ✓ Ergonomic Training

Reach out to a Health and Safety Consultant today!



Next Steps

How do I prepare?

Review and ensure you have the following:

- Health and safety policy and program to implement that policy (annual review)
- Training documents, including supervisor and worker awareness training documentation
- JHSC Meeting minutes
- Workplace inspection reports for the last year
- Detailed incident reports for all injuries in the last 1-2 years

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Post Webinar Survey



- Voluntary [Post Webinar Survey](#)
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THANK YOU

MLITSD

Health and Safety Contact Centre

webohs@ontario.ca

Toll-free: 1-877-202-0008

TTY: 1-855-653-9260

Thank you



Scan the QR code with your phone camera to visit PSHSA's Ministry campaigns and compliance initiatives support page or reach out to an expert today!



Public Services Health and Safety Association (PSHSA) is the trusted health and safety association for Ontario's healthcare and other public services sectors.



Visit pshsa.ca/compliance to learn more. To connect with a PSHSA health and safety consultant for 2026-2027 internal responsibility system (IRS) compliance support, resources, training, and consulting services, visit pshsa.ca/ask

Questions?