

Robert Prosser & Associates

AUDIT REPORT
ON THE
**OCCUPATIONAL HEALTH AND SAFETY
PROGRAM**

The City of Saskatoon, like all employers, is required by law to provide a safe working environment for its employees. A safe working environment can enhance workforce morale and productivity, and minimize Workers' Compensation and related costs.

This report addresses a broad range of issues including roles, responsibilities and authorities; compliance with applicable Occupational Health and Safety legislation and regulations; performance and results/outcomes; significant constraints and risk events; and comparison to best practices and industry guidelines.

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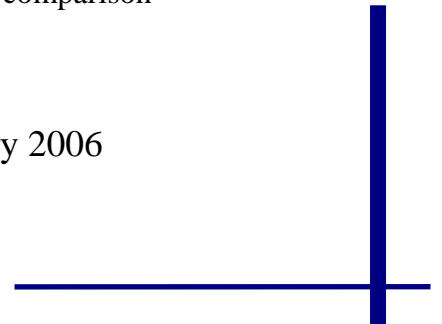


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Report Highlights

Overall Opinions

- For the most part, the roles, responsibilities and authorities assigned to the Occupational Health and Safety Program, managers, employees and unions appear to be clear, appropriate and understood throughout the organization.
- The Occupational Health and Safety Program appears to have adequate systems, practices and controls in place that, if followed consistently throughout the organization, would ensure compliance with applicable Occupational Health and Safety legislation, regulations, guidelines, policies, etc. at the overall corporate level.
- Certain aspects of performance and results/outcomes are being monitored. However, we are recommending that the set of indicators used be expanded. Specific, measurable objectives have not been established for existing indicators and therefore we are unable to conclude on whether objectives are being achieved.
- There are adequate systems, practices and controls in place to manage many of significant business risks facing the Occupational Health and Safety Program.
- For the most part, the components of the Safety and Injury Prevention Program are consistent with best practices and/or those advocated in the Occupational Health and Safety industry.
- The components of the Disability Assistance Program are consistent with best practices and/or those advocated in the Occupational Health and Safety industry.

Roles, Responsibilities and Authorities

For the most part, the roles, responsibilities and authorities assigned to the Occupational Health and Safety Program, managers, employees and unions appear to be clear, appropriate and understood throughout the organization. There is some uncertainty regarding the authority of the Occupational Health and Safety Program as it relates to civic Boards and Commissions (i.e., Saskatoon Centennial Auditorium, Mendel Art Gallery and Credit Union Centre). The City Solicitor indicates that this issue will be clarified in the near future.

We are recommending that:

- *The City Manager ensure health and safety is considered in the annual performance reviews of all General Managers and operational managers/supervisors.*
- *An employee safety survey be developed and administered at least every three years.*

Legislative and Regulatory Compliance

The Occupational Health and Safety Program appears to have adequate systems, practices and controls in place that, if followed consistently throughout the organization, would ensure compliance with applicable Occupational Health and Safety legislation, regulations, guidelines, policies, etc. at the overall corporate level.

The systems, practices and controls at the individual department/program level are outside the scope of the Occupational Health and Safety Program and therefore were not included in this audit.

Performance

Occupational Health and Safety Program

Certain aspects of the Occupational Health and Safety Program's performance and results/outcomes are being monitored. However, we are recommending that the set of indicators used by the Program be expanded to include more positive performance indicators, consistent with the direction advocated in the industry. Specific, measurable objectives have not been established for existing indicators. Although there has been improvement in most of the adopted indicators, we cannot conclude on whether objectives are being achieved.

Disability Assistance Program

Certain aspects of the Disability Assistance Program's performance and results/outcomes are being monitored. However, we are recommending that the set of indicators used by the Program be expanded. Specific, measurable objectives have not been established for existing indicators and therefore we are unable to conclude on whether objectives are being achieved.

We are recommending that:

- *Additional performance indicators be adopted for the Occupational Health and Safety Program and Disability Assistance Program.*
- *Specific objectives be established for each performance indicator.*
- *Systems be put in place to monitor actual performance.*
- *Annual reports be prepared comparing actual performance to objectives.*

Constraints and Risks

The most significant constraints faced by the Occupational Health and Safety Program include the lack of involvement in the design and review process for workplace capital projects and an information technology system that is not useful.

There are adequate systems, practices and controls in place to manage many of significant business risks facing the Occupational Health and Safety Program.

We are recommending that:

- *The Occupational Health and Safety Program be included in the design review process for all workplace capital projects.*
- *Alternatives for improving the availability and usefulness of health and safety incident/accident information be evaluated.*
- *Workplace inspection frequency standards and workplace-specific inspection checklists be developed.*
- *The Occupational Health and Safety Program be notified of all employees who are promoted to a management or supervisory position.*

Safety and Injury Prevention Program

For the most part, the components of the Safety and Injury Prevention Program are consistent with best practices and/or those advocated in the Occupational Health and Safety industry.

We are recommending that:

- *Controls be strengthened to ensure all employees who require safety training receive the required training.*
- *Systems be implemented to gauge participant comprehension, retention and satisfaction with training sessions.*
- *A long-term strategic plan be prepared for the Occupational Health and Safety Program.*
- *The Purchasing Policy be amended to include the requirement to consider occupational health and safety in purchasing decisions.*

Disability Assistance Program

The return to work program for work related injuries is administered by the Saskatchewan Workers' Compensation Board. Although the Occupational Safety Superintendent provides some support to the Workers' Compensation Board, the City of Saskatoon has no control over the return to work process in these cases. Therefore, we excluded this process from our audit.

The Disability Assistance Program administers the return to work program for non-work related injuries and illnesses, and for work related cases that the Workers' Compensation Board has transferred to the City of Saskatoon (i.e., the employee can not return to their pre-injury position). The components of the Disability Assistance Program are consistent with best practices and/or those advocated in the Occupational Health and Safety industry.

Chapter 1 Introduction

The corporate audit plan included provision to conduct an assurance audit of the Occupational Health and Safety Program.

Background

The City of Saskatoon, like all employers, is required by law to provide a safe working environment for its employees. A safe working environment can enhance workforce morale and productivity, and minimize Workers' Compensation and related costs.

As specified in City of Saskatoon Administrative Policy A04-011 "Occupational Health and Safety – General," the purpose of the Occupational Health and Safety Program is to:

- Provide a safe and healthy workplace which meets or exceeds legislative requirements,
- Assist workers in improving their present health status and facilitate their best level of productivity and wellness,
- Enhance the workplace by minimizing or eliminating hazards which may result in personal injuries/illnesses, service interruption, fires and property damage, and
- Comply with *The Occupational Health and Safety Act and Regulations*.

The City of Saskatoon has a large and diverse workforce that totals 2,575.7 full time equivalents. Departments also utilize part time and/or seasonal positions, which increase the number of individual employees served by the Program above this number. Over the past five years, the full time equivalents employed by the City have increased by 7.9%.

Table 1 : Full Time Equivalents - 2001-2005 Budget

	2001	2002	2003	2004	2005
Civic Departments	1,326.3	1,334.2	1,360.0	1,396.4	1,417.6
Utilities	524.7	543.2	541.3	550.2	556.1
Boards and Commissions¹	536.5	544.1	563.9	591.7	602.0
Total	2,387.5	2,421.5	2,465.2	2,538.3	2,575.7

The safety of the workplace is commonly measured by injury frequency rate (i.e., how often employees are injured) and injury severity rate (i.e., how serious the injury is). Although the *injury frequency rate* has increased since 2000, it has remained stable over the past three years. After reaching a high of 252.2 in 2001, the *injury severity rate* has decreased and is now lower than that experienced in 2000. There has been an increase in total compensation costs for the organization as a whole since 2000.

Table 2: Injury Frequency and Severity Rates - 2000-2004

	2000	2001	2002	2003	2004
Injury Frequency Rate (Lost time injuries x 200,000) /Exposure Hours)	4.6	6.8	5.8	5.5	5.8
Injury Severity Rate (Lost time days x 200,000) /Exposure Hours)	155.6	252.2	203.1	119.8	125.8
Total Compensation Costs (medical, lost time & permanent disability costs)	\$900,666	\$1,255,803	\$1,323,042	\$822,905	\$1,187,937

Project Scope and Objectives

The scope of the audit included all major activities of the Occupational Health and Safety Program, but did not include analysis or evaluation of health and safety practices in individual operating departments. Specific lines of enquiry included the following:

- Are the roles, responsibilities and authorities of the Occupational Health and Safety Program vis-à-vis managers, employees and unions, clear, appropriate and understood throughout the corporation?
- Does the Program have adequate systems, practices and controls in place to ensure compliance with applicable Occupational Health and Safety legislation, regulations, guidelines, policies, etc.?
- Are key aspects of the Program's performance and results/outcomes being monitored? Are the Program's operational- and outcome-related objectives being achieved?
- Are there any significant constraints and/or risk events that could seriously impair achievement of the Program's objectives?
- Are the Program's components (i.e. structure, functions and activities) consistent with best practices and/or those advocated in the Occupational Health and Safety industry?

Audit Approach

The audit approach included:

- Interviews with management and staff of the Program,
- Collection and review of relevant documents,
- Collection and review of relevant legislation,
- Literature research and benchmarking,
- Analysis of data in resident computer systems, and
- Survey of senior management (forty-six survey responses were received – see Appendix A).

Acknowledgements

Robert Prosser & Associates Inc. wishes to extend special thanks to the General Manager of the Corporate Services Department, the Employee Services Branch Manager, the Occupational Safety Superintendent and their staff for accommodating our requests for interviews, information and documents, and reviewing our audit findings.

Chapter 2 Roles, Responsibilities and Authorities

One of the objectives of the audit was to determine the extent to which the roles, responsibilities and authorities of the Occupational Health and Safety Program, vis-à-vis managers, employees and unions, are clear, appropriate and understood throughout the organization.

For the most part, the roles, responsibilities and authorities assigned to these parties appear to be clear, appropriate and understood throughout the organization. There is some uncertainty regarding the authority of the Occupational Health and Safety Program as it relates to civic Boards and Commissions (i.e., Saskatoon Centennial Auditorium, Mendel Art Gallery and Credit Union Centre). The City Solicitor indicates that this issue will be clarified in the near future.

Although the scope of the audit did not include provision to conduct an employee safety survey, the distribution of various policies and the “Occupational Health and Safety Employee Handbook” provide reasonable assurance that employees understand their role, responsibilities and authorities. In our opinion, an employee safety survey should be conducted to gather information regarding the exact level and extent of understanding.

City of Saskatoon

Various Occupational Health and Safety policies clearly describe the role, responsibilities and authorities of the City of Saskatoon and its senior administration. The responsibilities and authorities assigned appear to be appropriate.

Role of the City of Saskatoon

The City of Saskatoon, like all employers, is obligated by law to provide a safe working environment for its employees. However, beyond being a legislated requirement, a safe working environment enhances employee morale and productivity, and helps minimize workers’ compensation, disability insurance, absenteeism and related costs.

The City of Saskatoon, which is personified by its senior administration, has a role to play as an advocate and supporter of safety in the workplace. It appears that the City of Saskatoon is taking adequate steps to ensure this role is understood throughout the organization, by both employees and the general public alike, as evidenced by:

- The City of Saskatoon Strategic Plan: one of the core values of the Strategic Plan is ensuring a safe and clean working environment;
- The City of Saskatoon Corporate Business Plan: one of the strategies in the Business Plan is to support the health and well-being of employees by increasing education and awareness of health and safety, and reduce the frequency and severity of accidents and injuries; and
- Publication and dissemination of an “Occupational Health and Safety Employee Handbook:” a pocket-sized handbook that employees can easily carry and refer to, endorsed by the City Manager.

Management safety survey results suggest that the role of the City of Saskatoon as the employer is understood throughout the organization:

- 91% of survey respondents who expressed an opinion agree or strongly agree that senior management demonstrates an interest in the safety and health of employees,
- 93% of survey respondents who expressed an opinion agree or strongly agree that senior management considers the safety of employees of great importance, and
- 100% of survey respondents who expressed an opinion agree or strongly agree that their immediate supervisor shows interest in the safety and health of employees.

Responsibilities of the City of Saskatoon

According to *The Occupational Health and Safety Act, 1993*, the general duties of employers include:

- Ensuring, insofar as is reasonably practicable, the health, safety and welfare at work of all of the employer's workers,
- Consulting and co-operating with any occupational health committee at the place of employment for the purpose of resolving concerns on matters of health, safety and welfare at work,
- Ensuring, insofar as is reasonably practicable, that workers are not exposed to harassment at the place of employment, and
- Complying with the Act and the regulations.

According to *The Occupational Health and Safety Regulations, 1996*, the general duties of employers include:

- Provide and maintain plant, systems of work and working environments that ensure, as far as is reasonably practicable, the health, safety and welfare at work of the employer's workers,
- Arrange for the use, handling, storage and transport of articles and substances in a manner that protects the health and safety of workers,
- Provide any information, instruction, training and supervision that is necessary to protect the health and safety of workers at work, and
- Provide and maintain a safe means of entrance to and exit from the place of employment

It appears that the City of Saskatoon is taking adequate steps to ensure these responsibilities are understood throughout the organization, as evidenced by the establishment and support of an Occupational Health and Safety Program; the approval of Health, Safety, Violence and Harassment policies; and the appointment of at least one representative to each Occupational Health Committee.

Authorities of the City of Saskatoon

The City of Saskatoon has the authority to allocate resources (human and financial) to the Occupational Health and Safety Program; ensure training opportunities are made available to, and attended by, all staff; and require accountability for safety performance. It appears that, for the most part, the City of Saskatoon is taking adequate steps to ensure this authority is understood throughout the organization, as evidenced by increasing the staff resources dedicated to the Occupational Health and Safety program, funding improvements that contribute to workplace safety and providing ongoing training opportunities to new and existing employees.

However, it appears that the City of Saskatoon is not consistently and formally holding managers accountable for safety performance. One of the responsibilities of the City Manager per Administrative Policy A04-011 “Occupational Health and Safety – General” is to “ensure that the performance of all managers/supervisors is measured relative to this program, as occupational health and safety is a line responsibility.” Survey responses indicate that this is not always being completed:

- 26% of survey respondents who expressed an opinion indicate that their annual performance plan does not include their requirement to help the organization achieve its safety and health goals, and
- 18% of survey respondents who expressed an opinion indicate that safety and health objectives have not been developed for their program.

Managers and Supervisors

Various Occupational Health and Safety policies clearly describe the role, responsibilities and authorities of managers and supervisors. The responsibilities and authorities assigned appear to be appropriate.

Role of Managers and Supervisors

Throughout the City of Saskatoon, when it comes to day-to-day operations, individual managers and supervisors have been assigned the role of the employer regarding the employees directly under their leadership. As such, their role is the same as that of the City of Saskatoon, namely to support and advocate safety in the workplace.

In our opinion, an employee safety survey could gauge how well this role is being demonstrated by managers/supervisors and the extent to which it is understood throughout the organization.

Responsibilities of Managers and Supervisors

Because of their regular contact with, and often close proximity to, employees, managers and supervisors have been assigned many of the employer’s responsibilities for ensuring health and safety in the workplace. This is a common practice among large organizations where there are many employees, various work sites and multiple layers of management (i.e., the employer, as represented by senior administration, can not be everywhere at once).

Roles, Responsibilities and Authorities, continued

These responsibilities have been clearly delegated in policy and are summarized as follows:

- Understanding and ensuring compliance with health and safety requirements,
- Ensuring hazards are identified and procedures are in place to control risks,
- Inspecting work areas and correcting unsafe conditions,
- Maintaining equipment in safe operating condition,
- Providing necessary personal protective equipment (PPE) and ensuring it is used properly,
- Ensuring employees are adequately trained regarding legislation, policy and procedures,
- Understanding emergency preparedness procedures, and
- Reporting and investigating incidents.

It appears that managers/supervisors understand their responsibilities and are taking action to ensure those responsibilities are fulfilled:

- 93% of survey respondents who expressed an opinion indicate that they clearly understand what their responsibilities are for the health and safety of employees,
- 86% of survey respondents who expressed an opinion are confident that they know of, and have addressed, all unsafe or hazardous conditions in their program areas,
- 98% of survey respondents who expressed an opinion are confident that each piece of equipment used by their employees is adequately maintained and safe to operate,
- 98% of survey respondents who expressed an opinion indicate that the proper personal protective equipment is always available for employees,
- 94% of survey respondents who expressed an opinion indicate that they strictly enforce the use of personal protective equipment, and
- 87% of survey respondents who expressed an opinion indicate that they are able to provide worksite-specific orientation and training to new and transferred employees within one week of their arrival.

Authorities of Managers and Supervisors

Due to the fact that managers and supervisors are responsible for ensuring safety in the workplace, they must have the authority to correct unsafe workplace practices, to recognize safety and discipline employees who do not follow safe work policies and procedures.

Management safety survey results indicate that these authorities are understood throughout the organization:

- 100% of survey respondents who expressed an opinion agree or strongly agree that they have the authority to correct unsafe practices or conditions in their program.
- 85% of survey respondents who expressed an opinion agree or strongly agree that they have the authority to discipline employees in the event that they do not follow safe workplace practices.

Employees

Various Occupational Health and Safety policies and the “Occupational Health and Safety Employee Handbook” clearly describe the role, responsibilities and authorities of employees. The responsibilities and authorities assigned appear to be appropriate.

In our opinion, an employee safety survey would gauge exactly how well the role, responsibilities and authorities are understood by employees throughout the organization.

Role of Employees

The Occupational Health and Safety Act and Regulations, and the Occupational Health and Safety Program, are in place to prevent employee injuries and accidents. Therefore, the employee’s role is that of a beneficiary.

Responsibilities of Employees

According to *The Occupational Health and Safety Act, 1993*, general duties of workers include:

- Taking reasonable care to protect his or her health and safety and the health and safety of other workers who may be affected by his or her acts or omissions,
- Refraining from causing or participating in the harassment of another worker, and
- Complying with the Act and the regulations.

According to *The Occupational Health and Safety Regulations, 1996*, general duties of workers include:

- Use the safeguards, safety appliances and personal protective equipment provided in accordance with the regulations, and
- Follow the safe work practices and procedures required by or developed pursuant to the regulations.

Occupational Health and Safety policies also specify that employees are responsible for:

- Understanding and complying with workplace health and safety requirements,
- Following safe work procedures,
- Using safety equipment, safety devices and personal protective equipment,
- Reporting unsafe conditions and hazards,
- Attending required safety training, and
- Reporting accidents, near misses, injuries or illness immediately.

Management safety survey results indicate that managers/supervisors believe their employees understand their general responsibilities for safety, but are not reporting all accidents, near misses, injuries or illness.

- 98% of survey respondents who expressed an opinion encourage employees to provide input and suggestions to improve safety and health,
- 100% of survey respondents who expressed an opinion encourage employees to identify and report safety hazards,
- 98% of survey respondents who expressed an opinion agree that health and safety are high priorities when employees are performing their job duties,
- 90% of survey respondents who expressed an opinion believe employees report every workplace incident, injury or illness they sustain, regardless of severity, and
- 19% of survey respondents who expressed an opinion believe that the procedure for reporting an injury or “near miss” is not understood by all employees.

We discussed, with Occupational Health and Safety program management, the contradictory survey responses received to the last two questions listed above. In their opinion, “near misses” are not always being reported to the Occupational Health and Safety program, perhaps as a result of employee concerns that if they report near misses they may be perceived as working carelessly. Near misses may be an indicator of unsafe working conditions and reporting should be encouraged in order to pursue corrective action before an injury occurs.

Authority of Employees

Due to the fact that employees are responsible for working safely, they must have the authority to refuse unsafe work. Employees are educated about this authority through training and the “Occupational Health and Safety Employee Handbook.”

Unions and Occupational Health and Safety Committees

Various Occupational Health and Safety policies clearly describe the role, responsibilities and authorities of Occupational Health and Safety Committees. The responsibilities and authorities assigned appear to be appropriate.

Role of Unions and Occupational Health and Safety Committees

The role of the various unions throughout the City of Saskatoon is that of advocate – for their members’ interests and wellbeing. In order to fulfill this role, each union appoints representatives to Occupational Health and Safety Committees. There are fourteen Committees throughout the organization. The role of the Occupational Health and Safety Committees is to advise and consult with the City of Saskatoon on issues of employee health and safety.

Responsibilities of Occupational Health and Safety Committees

The responsibilities of the Occupational Health and Safety Committees have been clearly defined in both legislation and policy, and include the requirement to:

- Advise, consult, develop and recommend actions to improve the health, safety and wellness of employees,
- Participate in the identification and control of safety hazards,
- Receive, consider and resolve matters respecting health and safety of workers,
- Promote and recommend means of education and delivery of information on health and safety issues,
- Maintain records with respect to duties of the committee,
- Cooperate with the Occupational Health and Safety Program and the City of Saskatoon,
- Carry out other duties as specified in the Act or Regulations, and
- Attend committee training as required.

A survey of Occupational Health and Safety Committees was outside the scope of this audit, but Occupational Health and Safety Program staff, who serve in an advisory role for the Committees in the organization, believe that the Committee's clearly understand their responsibilities. Since these staff members attend committee meetings and/or receive copies of the minutes of the meetings, they are in a good position to be able to gauge the level of understanding.

Authorities of Occupational Health and Safety Committees

Occupational Health and Safety Committees have the authority to conduct inspections in any area of the workplace, document the findings of those inspections and recommend corrective action. Management survey responses indicate that Occupational Health and Safety Committees are conducting such inspections, although not in all areas of the workplace and not as often as managers/supervisors desire:

- 22% of survey respondents who expressed an opinion indicate that health and safety inspections by the Occupational Health and Safety Committee are not being conducted in their program area regularly.
- 43% of survey respondents who expressed an opinion would appreciate health and safety inspections of their program area to occur more often.

We have included recommendations in chapter 5 regarding this issue.

Occupational Health and Safety Program

Various Occupational Health and Safety policies clearly describe the role, responsibilities and authorities of the Occupational Health and Safety program. The responsibilities and authorities assigned appear to be appropriate.

Role of the Occupational Health and Safety Program

The role of the Occupational Health and Safety Program is twofold – first, to prevent incidents/accidents and second, if an incident/accident occurs, to respond in order to prevent recurrence. Survey responses indicate that the program appears to be engaging in activities that support these roles.

- 93% of survey respondents who expressed an opinion believe that the Occupational Health and Safety program works effectively with management to prevent injuries, and
- 98% of survey respondents who expressed an opinion believe that the Occupational Health and Safety program works effectively to improve safety in the organization,
- 88% of survey respondents who expressed an opinion believe that the Occupational Health and Safety program works effectively with management to promote health in the workplace.

Responsibilities of the Occupational Health and Safety Program

The responsibilities of the Occupational Health and Safety Program have been clearly defined in policy, and include:

- Facilitating the development, implementation, and evaluation of health and safety programs,
- Providing education, information, and training in a variety of areas related to health and safety, injury prevention and incident investigation,
- Assisting in the identification of workplace hazards, assessment of risk, implementation of procedures to control risks, and investigations,
- Facilitating reporting requirements to the Department of Labour and Workers' Compensation Board,
- Advising and assisting the Occupational Health and Safety Committees,
- Collecting and maintaining resources for information on health and safety issues,
- Assisting in the determination of required safety equipment and personal protective equipment, and
- Providing reports and analysis of incidents, injury trends and lost time data.

Authorities of the Occupational Health and Safety Program

Due to the fact that the Occupational Health and Safety program is responsible for preventing and responding to injuries and accidents in the workplace, they must have the authority to require departments to implement preventive measures and correct unsafe working conditions. This authority has been provided for in policy and appears to be respected throughout the organization.

Based on discussions with Occupational Health and Safety program management, there appears to be some uncertainty regarding the authority of the Occupational Health and Safety program as it relates to Boards and Commissions, specifically the Saskatoon Centennial Auditorium, the Mendel Art Gallery and Credit Union Centre. Although representatives from each organization sit on one of the City of Saskatoon's Occupational Health and Safety Committees, these organizations are separate legal entities. The ability of the Occupational Health and Safety program to require these organizations to implement preventive or corrective measures has been questioned in the past.

The City Solicitor indicates that these issues will be clarified in the near future.

Recommendations:

- 1. That the City Manager ensure health and safety is considered in the annual performance reviews of all General Managers and operational managers/supervisors.**
- 2. That management of the Occupational Health and Safety program implement controls to ensure "near miss" incidents/accidents are reported.**
- 3. That management of the Occupational Health and Safety program develop an employee safety survey, administer the survey at least every three years, and use the survey results to identify opportunities for improvement and/or areas of concern.**

Management Response:

1. City Manager's Office:

- Agree.**
- Agree.**
- Agree.**

Chapter 3 **Legislative and Regulatory Compliance**

One of the objectives of the audit was to determine whether the Occupational Health and Safety Program has adequate systems, practices and controls in place to ensure compliance with applicable Occupational Health and Safety legislation, regulations, guidelines, policies, etc. An effective control system would include the following elements:

- Identification of the obligations of the City of Saskatoon,
- Allocation of responsibility to appropriate parties, including senior managers, managers and supervisors, employees, Occupational Health and Safety Committees and the Occupational Health and Safety Program,
- Education/promotion/awareness on the part of managers, supervisors and employees of the importance of compliance with specific legislative and regulatory requirements,
- Education/promotion/awareness of the risk of non-compliance, and
- Establishment of monitoring and reporting mechanisms to provide information to the appropriate level of management regarding non-compliance and corrective action taken.

The Occupational Health and Safety Program appears to have adequate systems, practices and controls in place that, if followed consistently throughout the organization, would ensure compliance with applicable Occupational Health and Safety legislation, regulations, guidelines, policies, etc. at the overall corporate level.

An examination of the systems, practices and controls at the individual department/program level was determined to be outside the scope of the audit.

Occupational Health and Safety Act and Regulations

Identification of Obligations

Regarding *The Occupational Health and Safety Act and Regulations*, the obligations of the City of Saskatoon, as an employer, are many – the *Act* is 50 pages, and the *Regulations* are 268 pages. Obligations range from very broad (e.g., ensure the health, safety and welfare of all employees at work) to very specific (e.g., provide approved eye flushing equipment).

Occupational Health and Safety Program staff are extremely knowledgeable about the legislative and regulatory requirements contained in the *Act* and *Regulations*, and based on survey results, this knowledge appears to extend throughout the organization.

- 90% of survey respondents who expressed an opinion indicate that the health and safety rules of the organization have been clearly explained to them.
- 91% of survey respondents who expressed an opinion indicate that there is good communication within the organization about safety issues that affect them and their employees.

Various general corporate policies have been prepared by the Occupational Health and Safety Program, based on the requirements specified in the *Act* and *Regulations*. There are also legislative requirements that are department/program specific (e.g., additional requirements for Firefighters, Electrical workers, employees who may be exposed to chemical and biological substances, etc.) and outside the control of the Occupational Health and Safety Program – we did not examine the control system regarding these items.

Allocation of Responsibility

Various general corporate policies assign responsibility for ensuring the health and safety of employees, and by extension, legislative and regulatory compliance, to various parties throughout the City of Saskatoon (see chapter 2). These policies were prepared by the Occupational Health and Safety Program; therefore, there is clear understanding of the responsibilities conferred upon the program by Occupational Health and Safety Program staff.

Based on survey responses, there appears to be a strong understanding of the responsibilities conferred upon senior managers, managers and supervisors:

- 93% of survey respondents who expressed an opinion clearly understand what their responsibilities are for the health and safety of their employees.

Importance of Compliance

There is no question that ensuring employee health and safety, and by extension, complying with legislative and regulatory requirements, is an important objective for the City of Saskatoon. This is evidenced by the organization's Strategic Plan and Business Plan, and the City Manager's communications with senior managers on this issue.

There appears to be a strong understanding of the importance of providing a safe working environment, and by extension, complying with legislative and regulatory requirements, in the organization.

- 98% of survey respondents who expressed an opinion indicate that their safety responsibilities are just as important as their other job responsibilities.
- 98% of survey respondents who expressed an opinion agree that health and safety are high priorities when employees are performing their job duties.
- 90% of survey respondents who expressed an opinion agree that safety rules and procedures need to be followed to get the job done safely.

Risk of Non-Compliance

From an operational point of view, the potential consequences of not providing a safe working environment for employees and not complying with legislation and regulations include:

- Employee injuries: which could necessitate the replacement of that employee for the duration of their recovery and the costs associated with that replacement (e.g., recruiting, training and salary costs; lost productivity; overtime for remaining employees),

- Poor corporate image: an unsafe working environment, whether real or perceived, has a negative impact of the image of the City of Saskatoon as an employer, which may make it more difficult to attract and retain qualified staff.

From a legislative point of view, there is a risk that the Department of Labour could impose a fine or penalty upon the City of Saskatoon, the City Manager and/or an individual General/Branch/Program manager. The magnitude of these fines or penalties can be significant (i.e., fines or penalties can range from \$2,000 to \$100,000 plus \$10,000 per day, and can also include imprisonment).

Recent amendments to the Criminal Code of Canada also allow for the Government of Canada to levy charges, assess penalties and/or impose prison sentences in the event that criminal health and safety offences have occurred in the workplace. Those individuals at risk of such action include “everyone who undertakes, or has the authority, to direct how another person does work or performs a task...” Fines under the criminal code have no predetermined limit, and the maximum sentence for an individual convicted of “criminal negligence causing death” is life imprisonment.

Monitoring and Reporting Mechanisms

The Occupational Health and Safety Program should be responsible for monitoring and reporting on compliance with the *Act* and *Regulations* given that the objectives of the Program are identical to those of the *Act* and *Regulations* – the primary objective is to protect the health and safety of employees by preventing work-related accidents, injuries and/or illnesses; the secondary objective is to ensure that when an accident, injury and/or illness does occur, effective measures are taken to prevent recurrence.

The Occupational Health and Safety Program relies on incident/accident reports, Occupational Health and Safety Committee inspections, Department of Labour inspections and independent audits to identify instances of unsafe working conditions and/or legislative and regulatory non-compliance.

Incident/Accident Reports

Although analysis of actual incidents/accidents is useful in order to identify specific areas where corrective action is known to be necessary, the main drawback to this approach is that it is reactive (i.e., after an injury or accident has occurred) rather than proactive.

An analysis of “near misses” is a proactive approach to issue/hazard identification. As discussed in chapter 2, the Occupational Health and Safety Program is not receiving “near miss” reports.

Occupational Health and Safety Committee Inspections

Occupational Health and Safety Committee Inspections focus on identifying unsafe conditions and hazards on a proactive basis (i.e., before an injury or accident has occurred). However, it is our understanding that some workplace areas are not being inspected on a regular basis. Occupational Health and Safety Program staff sit on each Occupational Health and Safety Committee and participate in each inspection.

Department of Labour Inspections

Department of Labour inspections also focus on proactively identifying unsafe conditions and hazards. Occupational Health and Safety Program staff receive copies of inspection reports and, if relevant, share issues that arise from these inspection reports with other Occupational Health and Safety Committees in order to learn from each other and proactively identify and correct similar situations at other workplaces.

Audits

The Occupational Health and Safety Program facilitates independent audits of health and safety programs and procedures in individual program areas. Program areas that have been subject to independent audits include Water and Waste Water Treatment, Saskatoon Light and Power, Water Treatment Plant and Water Meter Section, Facilities Branch, Transit, Parks, Public Works and Fire and Protective Services. Audits are an effective way to proactively identify potential areas of non-compliance.

Survey responses indicate that almost all managers/supervisors understand their health and safety responsibilities and are taking steps to ensure compliance:

- 94% of survey respondents who expressed an opinion strictly enforce the use of personal protective equipment,
- 95% of survey respondents who expressed an opinion are confident that they know of, and have addressed, all unsafe or hazardous conditions in their areas,
- 98% of survey respondents who expressed an opinion are confident that each piece of equipment used by employees is adequately maintained and safe to operate, and
- 93% of survey respondents who expressed an opinion believe that the Occupational Health and Safety Program works effectively with management to prevent injuries.

The Workers' Compensation Act and Regulations

Identification of Obligations

Regarding *The Workers' Compensation Act and Regulations*, the obligations of the City of Saskatoon, as an employer, are largely administrative – notifying the Workers' Compensation Board (WCB) about injuries in a timely manner (i.e., five days) and providing certain specified information on a regular basis or upon request.

Administrative Policy A04-011(B)(9) “Work Injury Claims Administration” complies with legislative and regulatory requirements. There are also requirements of Payroll (e.g., providing payroll information), Facilities Management (e.g., contractual work) and the Comptroller's Office (e.g., payment of assessments) which are outside the control of the Occupational Health and Safety Program – we did not examine the control system regarding these items.

Allocation of Responsibility

Responsibility for ensuring all injuries are reported as soon as possible, and by extension, legislative and regulatory compliance, has been allocated to various parties throughout the City of Saskatoon, namely managers/supervisors (report lost time injuries/illnesses immediately following the accident), employees (report injuries or illness to their manager/supervisor immediately), and Occupational Health and Safety Services (provide reports to the WCB).

This policy was prepared by the Occupational Health and Safety Program, and therefore there is clear understanding of the responsibilities conferred upon the program by Occupational Health and Safety Program staff. This knowledge appears to extend throughout the organization:

- 90% of survey respondents who expressed an opinion indicate that their employees report every workplace incident, injury or illness they sustain, regardless of severity.
- 81% of survey respondents who expressed an opinion indicate that the procedure for reporting an injury or “near miss” is understood by all of their employees.

As discussed in chapter 2, Occupational Health and Safety Program staff are of the opinion that the reason for the poor survey response to the last question listed above may be due to the inclusion of the term “near miss” in the survey question. Occupational Health and Safety Program management believes near misses are not being reported and the procedure for reporting them may not be understood.

Importance of Compliance

In order to ensure claims are dealt with quickly and avoid fines or penalties, the WCB must be appropriately notified of the injury.

Risk of Non-Compliance

From a legislative point of view, there is a risk that the WCB could impose a fine or penalty upon the City of Saskatoon. The magnitude of these fines or penalties can be significant, depending on the injury (i.e., a fine of not more than \$1,000 plus compensation and medical aid).

Monitoring and Reporting Mechanisms

The Occupational Health and Safety Program has a system in place to monitor and report on compliance with the *Act* and *Regulations*.

Recommendation:

That the information be received.

Chapter 4 Performance

One of the objectives of the audit was to determine whether key aspects of performance and results/outcomes are being monitored and whether operational- and outcome-related objectives are being achieved. Monitoring performance helps management assess the effectiveness of key strategies and initiatives, which can then be used to focus improvement efforts.

Occupational Health and Safety Program

Certain aspects of the Occupational Health and Safety Program’s performance and results/outcomes are being monitored. However, we are recommending that the set of indicators used by the Program be expanded to include more positive performance indicators, consistent with the direction advocated in the industry. Specific, measurable objectives have not been established for existing indicators. Although there has been improvement in most of the adopted indicators, we cannot conclude on whether objectives are being achieved.

Disability Assistance Program

Certain aspects of the Disability Assistance Program’s performance and results/outcomes are being monitored. However, we are recommending that the set of indicators used by the Program be expanded. Specific, measurable objectives have not been established for existing indicators and therefore we are unable to conclude on whether objectives are being achieved.

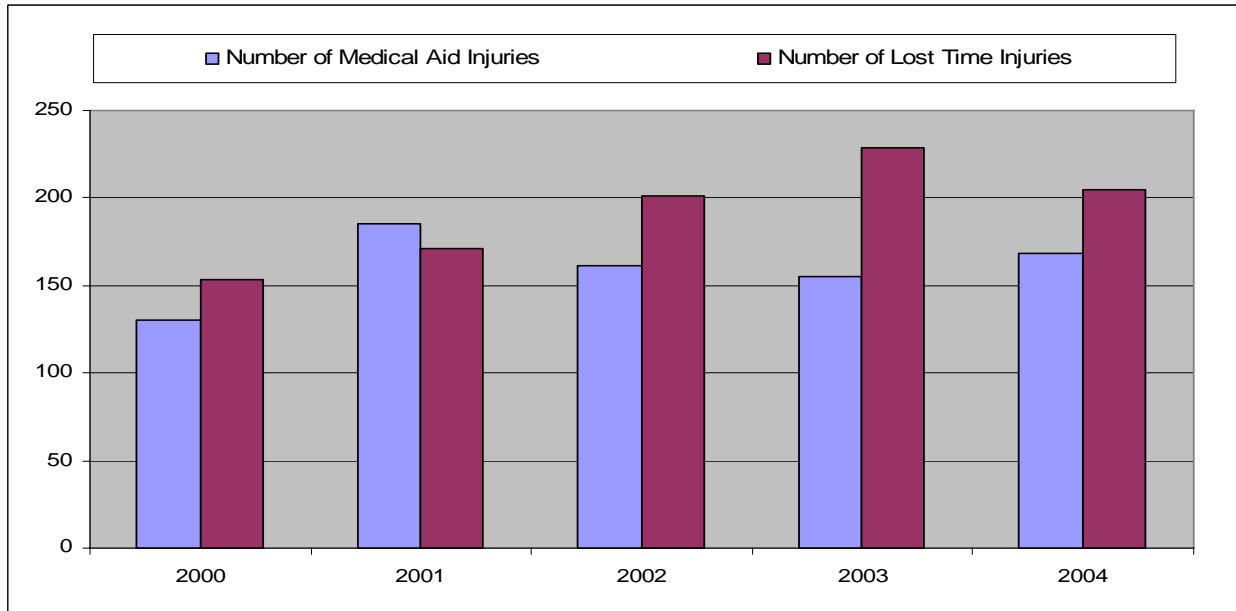
Occupational Health and Safety Program

The Occupational Health and Safety Program has adopted the following performance and result/outcome indicators. Although the overall corporate goal is to decrease the number, frequency, severity and cost of injuries, specific objectives have not been established.

Performance/Result/Outcome Indicator	Description
Number of Medical Aid Injuries.	The number of incidents/accidents that resulted in an employee requiring medical aid.
Number of Lost Time Injuries.	The number of incidents/accidents that resulted in an employee missing work.
Number of Lost Time Days.	The number of day’s employees missed work due to incident/accident.
Lost Time Injury Frequency Rate.	The percentage chance of missing work due to an injury.
Lost Time Injury Severity Rate.	An approximation of the average severity of incidents as measured by the number of days of work missed due to the injury/incident.
Medical Cost.	Cost of medical treatment as a result of an incident/accident.
Lost Time Cost.	Cost of employee wages as a result of an incident/accident.
Permanent Disability Cost.	Cost of permanent disability payments as a result of an incident/accident.

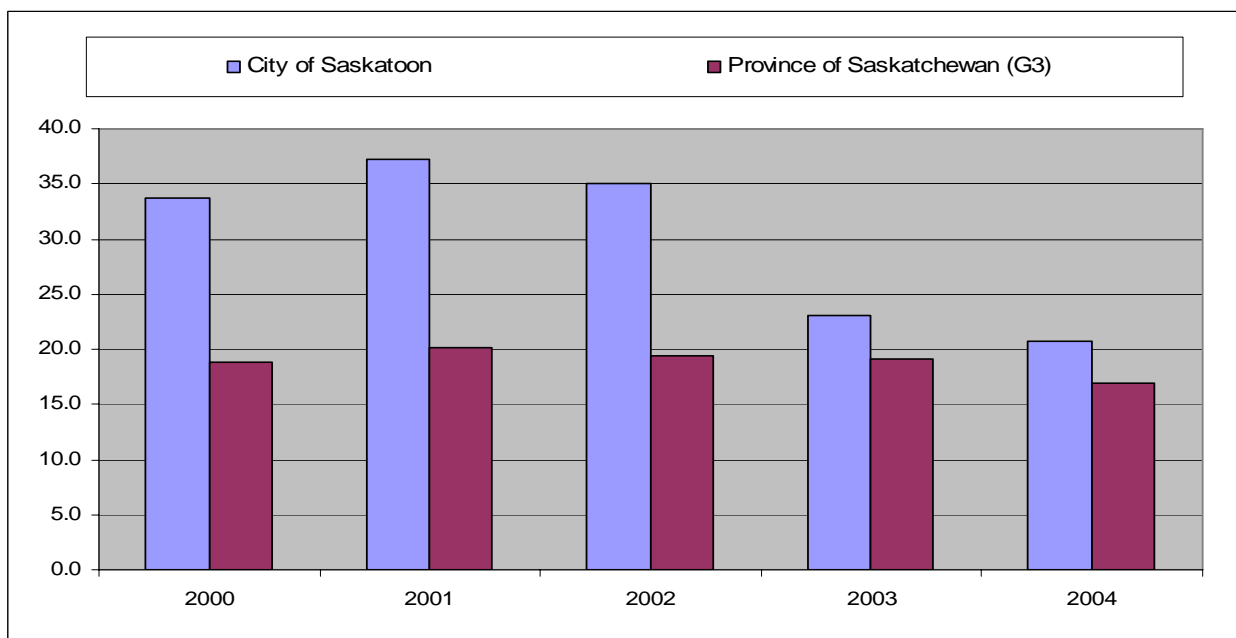
Over the last five years, the number of lost time injuries has been on an increasing trend, while the number of medical aid injuries has been fairly stable.

Figure 1: Number of Medical Aid and Lost Time Injuries - 2000-2004



Over this same time period, the average number of days lost per lost time injury has been decreasing due to the strengthening of the return to work program. The City of Saskatoon's average is higher than the Provincial average for the City of Saskatoon's rate code¹, but the difference between the two has been decreasing.

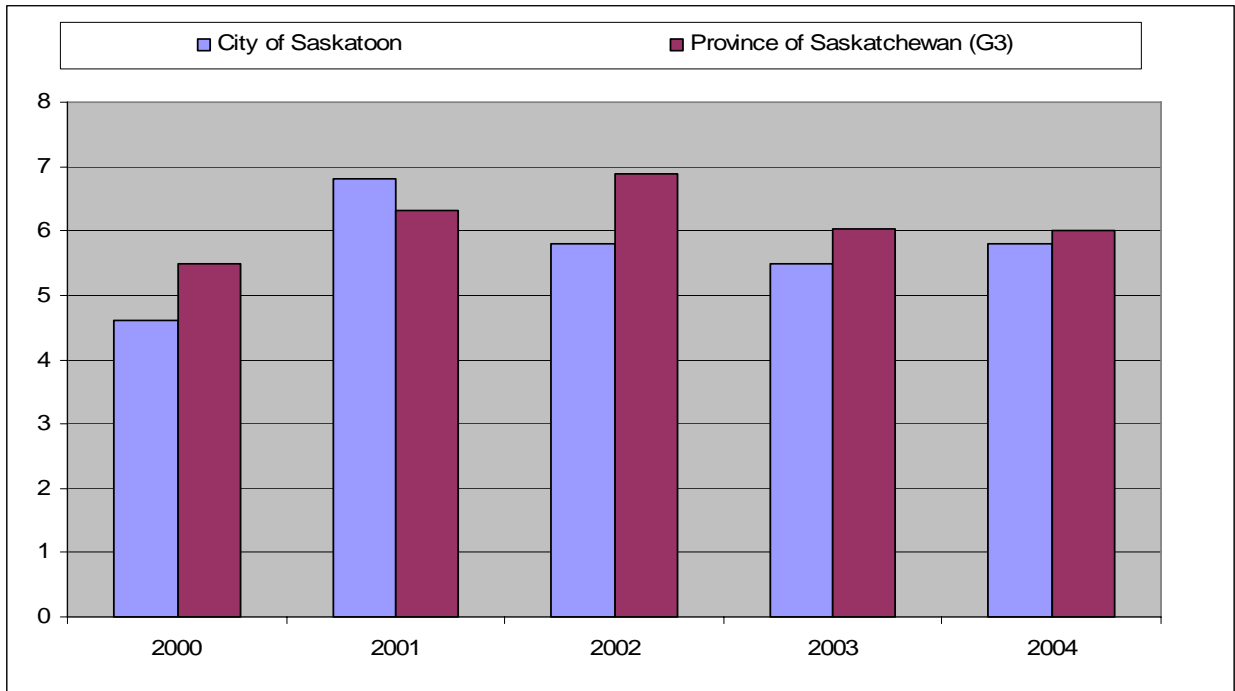
Figure 2: Average Number of Days Lost per Lost Time Injury - 2000-2004



¹ The City of Saskatoon's rate code is G3, which includes all cities, towns, villages and rural municipalities in the province.

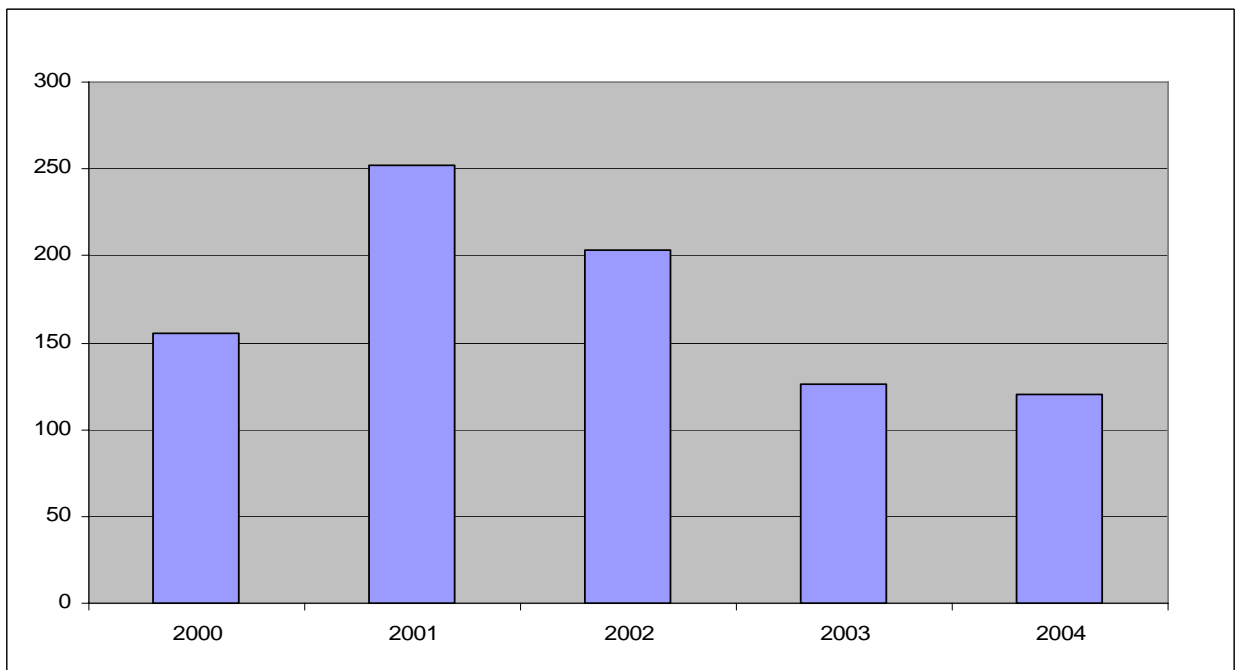
The lost time frequency rate has been decreasing since 2001, and with the exception of 2001, has been lower than the Provincial average for the City of Saskatoon's rate code.

Figure 3: Lost Time Frequency Rate - 2000-2004



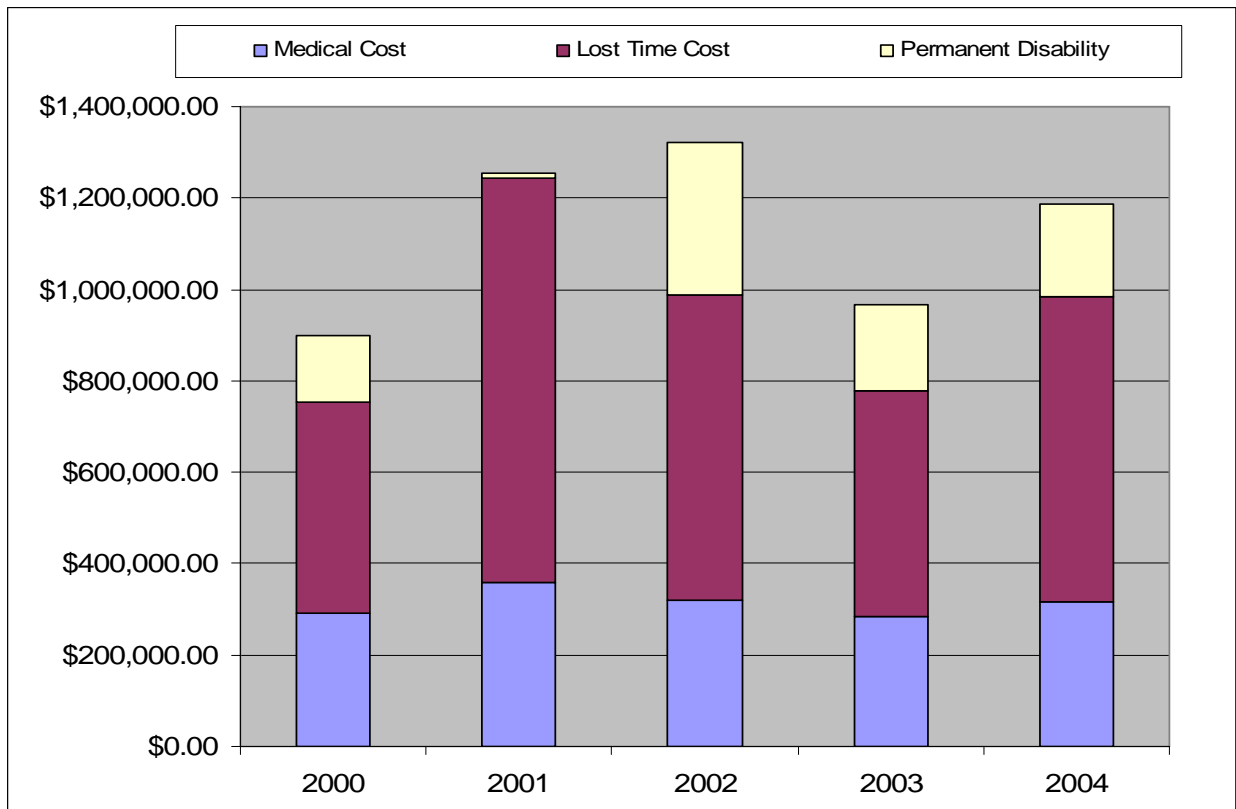
After a spike in 2001, the lost time severity rate has been decreasing, and it is lower in 2004 than it was in 2000. This is due in part to the strengthening of the return to work program.

Figure 4: Lost Time Severity Rate - 2000-2004



Total compensation costs have been quite volatile over the past five years. Permanent disability costs represent payments for previous year(s) injuries, and do not reflect current period performance. Medical costs have been quite stable but lost time costs, which are the most significant component of total compensation costs, have varied significantly. Per management, this is due in part to changes in the maximum wage rate allowed by the WCB and the outcome of several appeals.

Figure 5: Total Compensation Costs - 2000-2004



All of the indicators adopted by the Occupational Health and Safety Program are generally accepted in the industry as traditional performance indicators for a safety program. However, there is a movement in the industry to move away from traditional performance indicators to positive performance indicators.

This movement has come about as a result of the fact that traditional performance indicators are “lagging” indicators, meaning that:

- They focus on failures rather than successes (i.e., cases where employees were injured rather than injuries were prevented),
- They reflect the impact of safety measures implemented some time ago (i.e., it may take time for changes in procedures, attitudes and practices to be adopted and translate into fewer incidents/accidents), and

- They measure the severity, but not necessarily the seriousness of an incident/accident (e.g., a serious incident like an explosion or equipment malfunction in which no one was injured is not reflected in the statistics).

Positive performance indicators measure the actions an organization has taken to achieve its targets (i.e., prevent and respond to injuries/illnesses) and are “leading” indicators of performance. Industry literature² suggests that positive performance indicators should focus on five areas:

- Risk management,
- Management of work processes,
- Participation, communication and skills,
- Planning, design and procurement, and
- Monitoring and review.

Research of industry literature and discussion with Program management suggests that, in addition to the indicators already adopted, the following positive performance indicators would be appropriate for the City of Saskatoon’s Occupational Health and Safety Program.

² “Positive Performance Indicators – Measuring Safety, Rehabilitation and Compensation Performance,” Australian Government, Comcare, SRC Commission, June 2004.

Table 3: Positive Performance Indicators - Occupational Health and Safety Program

Area	Positive Performance Indicator	Purpose
Risk management	<ul style="list-style-type: none"> • #/% of planned workplace risk assessments completed 	<ul style="list-style-type: none"> • Identify hazardous conditions before an injury occurs
	<ul style="list-style-type: none"> • #/% of planned workplace safety inspections completed 	<ul style="list-style-type: none"> • Identify unsafe working conditions before an injury occurs
	<ul style="list-style-type: none"> • #/% of reported incidents investigated 	<ul style="list-style-type: none"> • Prevent recurrence of incidents/accidents
	<ul style="list-style-type: none"> • % of at-risk workers immunized/vaccinated 	<ul style="list-style-type: none"> • Prevent illnesses (e.g., hepatitis, influenza, etc.)³
	<ul style="list-style-type: none"> • % of workers exposed to bloodborne pathogens submitting for follow up testing 	<ul style="list-style-type: none"> • Minimize risks to family members and co-workers
Management of work processes	<ul style="list-style-type: none"> • Results of inspections (ratings) 	<ul style="list-style-type: none"> • Deficiencies could be rated according to their risk and prioritized accordingly
	<ul style="list-style-type: none"> • % of risk assessment recommendations implemented 	<ul style="list-style-type: none"> • Ensure hazardous conditions are remedied before an injury occurs
	<ul style="list-style-type: none"> • % of workplace safety inspection recommendations implemented 	<ul style="list-style-type: none"> • Ensure unsafe working conditions are remedied before an injury occurs
	<ul style="list-style-type: none"> • % of incident investigation recommendations implemented 	<ul style="list-style-type: none"> • Avoid recurrence of a similar/same incident
Participation, communication and skills	<ul style="list-style-type: none"> • Employee perception of management commitment (survey) 	<ul style="list-style-type: none"> • One of the cornerstones of an effective safety and injury prevention program is the “tone at the top”
	<ul style="list-style-type: none"> • % of staff with adequate OH&S training 	<ul style="list-style-type: none"> • Prevent injuries
	<ul style="list-style-type: none"> • % of attendance at OHC meetings 	<ul style="list-style-type: none"> • Foster participation and communication regarding safety in the workplace
	<ul style="list-style-type: none"> • % of OHC recommendations implemented 	<ul style="list-style-type: none"> • Ensure unsafe working conditions are remedied before an injury occurs
	<ul style="list-style-type: none"> • % of managers and supervisors trained in their role and responsibilities 	<ul style="list-style-type: none"> • Clear understanding and acceptance helps ensure a safe working environment
Planning, design and procurement	<ul style="list-style-type: none"> • % of services contracts with OH&S clauses 	<ul style="list-style-type: none"> • The City of Saskatoon has a duty of care to contracted employees
	<ul style="list-style-type: none"> • % of major purchases made with OH&S risk assessment 	<ul style="list-style-type: none"> • Prevent injuries
Monitoring and review	<ul style="list-style-type: none"> • #/% of planned OH&S system audits undertaken 	<ul style="list-style-type: none"> • Ensure the OH&S system in its entirety, or its significant components, is working effectively⁴
	<ul style="list-style-type: none"> • % of OH&S system audit recommendations implemented 	<ul style="list-style-type: none"> • Prevent injuries

³ Program areas that are at high risk for bloodborne pathogen exposures include Fire and Protective Services, Police, Infrastructure Services and Utility Services.

⁴ These audits could be performed internally (e.g., self-assessment, OH&S Program staff) or externally (Department of Labour, Utility Risk Management, Saskatchewan Construction Safety Association, etc.).

Disability Assistance Program

The Disability Assistance Program has adopted the following performance and result/outcome indicators. Although the overall corporate goal is to increase the number of employees accommodated, specific objectives have not been established.

Table 4: Disability Assistance Disposition - 2001-2004

	2001	2002	2003	2004
Number of Employees Returned to Pre-Disability Position (no modifications)	n/a	15	17	17
Number of Employees Accommodated within their own position (with modifications)	n/a	9	3	12
Number of Employees Accommodated to a New Position	n/a	15	24	26
Total	29*	39	44	55

* This number represents all accommodations; information was not tracked to allow for breakdown by category.

Review of industry literature and discussion with Program management indicates that, in addition to those already adopted, potential performance indicators for the Program could also include:

- Number of accommodated employees in their new job position after 6 months, 1 year, 2 years, etc., taking into account temporary placements and nature of injury/illness,
- Number of work trials,
 - In total,
 - Resulting in a permanent accommodation, and
 - Not resulting in a permanent accommodation, and
- Satisfaction of employees and managers with their Program experience.

We would caution against considering the number of work trials not resulting in a permanent accommodation as constituting program failure or ineffectiveness. Although these trials are a poor use of Occupational Health and Safety staff, manager/supervisor and employee time, they should be considered a necessary aspect of the program (i.e., if we don't try, we won't know). It would be more appropriate to monitor trends in the relative proportion of trials not resulting in a permanent accommodation as indicators of the performance of the accommodation opportunity identification process itself, rather than the program as a whole.

Recommendations:

4. **That the Occupational Health and Safety Program:**
 - **adopt positive performance indicators, in addition to current performance indicators, that may include, but do not necessarily have to be limited to, those presented in this report;**
 - **establish specific objectives for each performance indicator adopted;**
 - **implement a system to monitor actual performance in relation to each performance indicator adopted; and**
 - **report to the General Manager of Corporate Services and the City Manager, on an annual basis, actual performance in relation to performance objectives.**

5. **That the Disability Assistance Program:**
 - **adopt performance indicators, in addition to current performance indicators, that may include, but do not necessarily have to be limited to, those presented in this report;**
 - **establish specific objectives for each performance indicator adopted;**
 - **implement a system to monitor actual performance in relation to each performance indicator adopted; and**
 - **report to the General Manager of Corporate Services and the City Manager, on an annual basis, actual performance in relation to performance objectives.**

Management Response:

4. **Agree.**

5. **Agree.**

Chapter 5 Constraints and Risks

One of the objectives of the audit was to determine whether there are any significant constraints and/or risk events that could seriously impair achievement of the Occupational Health and Safety Program's objectives.

The most significant constraints faced by the Occupational Health and Safety Program include the lack of involvement in the design and review process for workplace capital projects and an information technology system that is not useful.

There are several significant business risks facing the Occupational Health and Safety Program. There are adequate systems, practices and controls in place to manage many of these risks, but we are recommending improvements in the areas of training and workplace inspections.

Constraints

Workplace Capital Project Design and Review

Occupational Health and Safety Program staff indicate that, although they are responsible for ensuring a safe working environment, policy does not provide for their involvement in the design and review process for construction and renovation projects that affect the workplace.

Unfortunately, this has resulted in occupational health and safety issues being overlooked. For example, when two of the leisure centres were constructed (Harry Bailey Aquatic Centre and Lakewood Civic Centre), certain mechanical spaces were constructed without due consideration of health and safety implications. These spaces are much too small for employees to work safely and "confined space entry" rules must be followed each and every time an employee enters the area.

Information Technology System

The Occupational Health and Safety Program utilizes the SmartStream system for recording work-related incidents. SmartStream is primarily a human resources system, with an "add on" module for health and safety. Occupational Health and Safety Program staff do not find the SmartStream system useful, and each Safety Administrator has developed their own parallel system for analyzing incident statistics and trends. Such an approach does not encourage the efficient use of staff time or effective analysis of statistical data.

Risk Analysis

Throughout our analysis of significant risk events, we used the following definitions:

Risk: risk refers to the uncertainty that surrounds future events and outcomes. It is the expression of likelihood and impact of an event with the potential to influence the achievement of an organization's objectives⁵. There are two types of risk:

⁵ Treasury Board of Canada Secretariat, Integrated Risk Management Framework, p.8.

- **Inherent Risk:** the risk that exists before risk management practices have been implemented. **Low** likelihood suggests that the risk event is unlikely to occur, given its nature. **Medium** likelihood of occurrence suggests that the risk event has a moderate probability of occurrence. **High** likelihood of occurrence suggests that the risk event is likely to occur.
- **Residual Risk:** the risk that exists after risk management practices have been implemented. **Low** likelihood suggests that the risk event is unlikely to occur, given its nature and current risk management practices in place. **Medium** likelihood of occurrence suggests that the risk event has a moderate probability of occurrence. **High** likelihood of occurrence suggests that the risk event is likely to occur, despite current risk management practices in place.

Impact: impact refers to the extent of the consequences or implications if the risk event does occur. **Minor** impact suggests that the risk event would not have important implications on the organization. **Moderate** impact suggests that the risk event could have implications for the organization’s ability to succeed. **Significant** impact suggests that the risk event would have important implications on the organization.

Our overall conclusions regarding the residual risk of the major business risks facing the organization are presented graphically below.

Likelihood	Impact		
	Minor	Moderate	Significant
High			<ul style="list-style-type: none"> • Workplace inspections not performed in a timely manner (recommendation #16 and #17) • Poor quality workplace inspections (recommendation #18, #19 and #20)
Medium			<ul style="list-style-type: none"> • Training not provided to employees (recommendation #22 and #23) • Training not provided to employees in a timely manner (recommendation #26) • Poor quality training provided to employees (recommendation #24 and #25) • Poor quality accident investigations (recommendation #21)
Low			<ul style="list-style-type: none"> • Training not provided to Occupational Health and Safety Committee Co-Chairs • Workplace inspections not performed • Corrective action not taken in response to workplace inspection findings • Accident investigations not conducted • Accident investigations not completed in a timely manner • Corrective action not taken in response to accident investigation findings • Return to work plan not prepared • Inappropriate return to work plan prepared • Failure to accommodate • Inappropriate accommodation

Constraints and Risks, continued

Risk Event	Inherent Risk		Systems, Practices and Controls	Residual Risk		Additional Controls Required
	Likelihood	Impact		Likelihood	Impact	
Training						
Training not provided to employees.	High. The City of Saskatoon employs over 2,500 individuals who perform a wide range of activities. There are over fifty legislated training topics.	Significant. Failure to provide training could result in: <ul style="list-style-type: none"> • employee injuries, • a Notice of Contravention, • fines, and/or • imprisonment. 	<ul style="list-style-type: none"> • Responsibilities for employee training have been clearly specified in Administrative Policy A04-011(B)(1) “Orientation and Training.” • The Occupational Health and Safety Program has inventoried all of the training topics that are required pursuant to legislation. • The Occupational Health and Safety Program maintains records of employees who have received training. 	Medium.	Significant.	<p><i>In Chapter 6 we have recommended that a system be implemented that will identify, for each type of training required pursuant to legislation, all employees who should, but have not yet, received training.</i></p> <p><i>In Chapter 6 we have recommended that a plan be developed to address training gaps.</i></p>
Training not provided to Occupational Health and Safety Committee Co-Chairs.	Medium. The City of Saskatoon has fourteen Occupational Health and Safety Committees, with two Co-chairs per Committee.	Significant. Failure to provide training could result in: <ul style="list-style-type: none"> • a Notice of Contravention, • fines, and/or • imprisonment. 	<ul style="list-style-type: none"> • The Occupational Health and Safety Program maintains records of Co-Chairs who have received training. • When required, the Occupational Health and Safety Program requests that the Department of Labour conduct training sessions for all Co-Chairs who require training. 	Low.	Significant.	None required.
Training not provided to employees in a timely manner.	High. The City of Saskatoon employs over 2,500 individuals who perform a wide range of activities. There are over fifty legislated training topics.	Significant. A delay in training could result in: <ul style="list-style-type: none"> • employee injuries, • a Notice of Contravention, • fines, and/or • imprisonment. 	<ul style="list-style-type: none"> • Recertification training (e.g., first aid, CPR, WHMIS) is provided annually. • New employee orientation training is provided throughout the year. • Refresher training is provided as required based on analysis of incident/accident trends. • Training is provided for seasonal programs before the season begins. 	Medium.	Significant.	<i>In Chapter 6 we are recommending that managers, supervisors and Occupational Health and Safety Committees be consulted as to the types of training opportunities that are required throughout the organization.</i>

Constraints and Risks, continued

Risk Event	Inherent Risk		Systems, Practices and Controls	Residual Risk		Additional Controls Required
	Likelihood	Impact		Likelihood	Impact	
Poor quality training provided to employees.	High. With the exception of certification training (e.g., first aid, CPR and WHMIS), the training industry is largely unregulated.	Significant. Poor quality training could result in: <ul style="list-style-type: none"> • employee injuries, and/or • ineffective use of training dollars. 	<ul style="list-style-type: none"> • The Occupational Health and Safety Program ensures that those who provide training sessions are properly qualified, certified (when applicable) and knowledgeable. • The Occupational Health and Safety Program has developed its own training programs, and also makes use of Department of Labour and/or Workers' Compensation Board publications and resources. • Occupational Health and Safety Program staff are members of the Canadian Society of Safety Engineering, cultivate relationships with counterparts in Saskatchewan and across Canada, and share information/solicit input on the quality of training providers. 	Medium.	Significant.	<i>In Chapter 6 we are recommending that a system be implemented to gauge participant comprehension, retention and satisfaction with training sessions.</i>
Inspections						
Workplace inspections not performed.	High. The City of Saskatoon has many different workplaces throughout the city (e.g., City Hall, , Fire Stations, Transit, golf courses, arenas, Yards, leisure centres, Light and Power, Water Treatment, etc.).	Significant. Failure to conduct workplace inspections can result in: <ul style="list-style-type: none"> • employee injuries, • a Notice of Contravention, • fines, and/or • imprisonment. 	<ul style="list-style-type: none"> • In conjunction with every Occupational Health and Safety Committee meeting, a workplace inspection is performed. • Occupational Health and Safety Committee meetings are rotated among workplaces (e.g., for Leisure Services, the meetings are rotated among the indoor leisure centres). • Performance of workplace inspections is recorded in the Occupational Health and Safety Committee meeting minutes. 	Low.	Significant.	None required.

Constraints and Risks, continued

Risk Event	Inherent Risk		Systems, Practices and Controls	Residual Risk		Additional Controls Required
	Likelihood	Impact		Likelihood	Impact	
Workplace inspections not performed in a timely manner.	High. There are a large number of workplaces to inspect.	Significant. Untimely workplace inspections can result in employee injuries.	<ul style="list-style-type: none"> Although the performance of workplace inspections is recorded in the Occupational Health and Safety Committee meeting minutes, determining when the last inspection took place involves examining the minutes of past meetings. Standards for inspection frequency have not been developed. 	High.	Significant.	<ul style="list-style-type: none"> That the Occupational Health and Safety Program inventory all workplaces and develop a system to readily determine the last date of inspection for each. That the Occupational Health and Safety Program, in cooperation with Occupational Health and Safety Committees, develop workplace inspection frequency standards.
Poor quality workplace inspections.	High. There are dozens of individual items that should be inspected in each workplace.	Significant. Poor quality workplace inspections can result in employee injuries.	<ul style="list-style-type: none"> The Department of Labour encourages the use of checklists to ensure thorough workplace inspections. Most Occupational Health and Safety Committees do not utilize checklists when conducting workplace inspections. Procedures have not been developed regarding workplace inspections. 	High.	Significant.	<ul style="list-style-type: none"> That the Occupational Health and Safety Program, in cooperation with Occupational Health and Safety Committees, develop and implement workplace-specific inspection checklists. That the Occupational Health and Safety Program, in cooperation with Occupational Health and Safety Committees, develop and implement workplace inspection procedures. That the Occupational Health and Safety Program ensure that each Occupational Health and Safety Committee receives training on workplace inspection procedures.

Constraints and Risks, continued

Risk Event	Inherent Risk		Systems, Practices and Controls	Residual Risk		Additional Controls Required
	Likelihood	Impact		Likelihood	Impact	
Corrective action not taken in response to workplace inspection findings.	High. Corrective action often involves time and/or additional funding.	Significant. Failure to take corrective action can result in: <ul style="list-style-type: none"> • employee injuries, • a Notice of Contravention, • fines, and/or • imprisonment 	<ul style="list-style-type: none"> • Responsibility for implementing corrective action has been clearly specified in Administrative Policy A04-011(B)(3) “Planned Inspections.” • Inspection results/deficiencies are recorded on a standardized form that is provided to the responsible program or branch manager, the Occupational Health and Safety Program and the Occupational Health and Safety Committee. • The responsible program or branch manager is responsible for reporting back to the Occupational Health and Safety Program when all deficiencies are resolved. • Occupational Health and Safety Committees monitor outstanding deficiencies. 	Low.	Significant.	None required.
Investigations						
Accident investigations not conducted.	High. Investigations could be perceived as an exercise in finding fault or laying blame.	Significant. Failure to investigate accidents can result in: <ul style="list-style-type: none"> • employee injuries, • a Notice of Contravention, • fines, and/or • imprisonment. 	<ul style="list-style-type: none"> • Responsibility for conducting accident investigations has been clearly specified in Administrative Policy A04-011(B)(8) “Accident/ Incident Reporting and Investigation.” • Investigation Report forms require managers/supervisors to determine and explain the underlying cause of all accidents. • Occupational Health and Safety Program staff review Investigation Reports to ensure the accident has been investigated. 	Low.	Significant.	None required.

Constraints and Risks, continued

Risk Event	Inherent Risk		Systems, Practices and Controls	Residual Risk		Additional Controls Required
	Likelihood	Impact		Likelihood	Impact	
Poor quality accident investigations.	High. Depending on the circumstances, it may be difficult to determine the root cause of an accident.	Significant. Poor quality accident investigations can result in: <ul style="list-style-type: none"> • ineffective corrective action, • employee injuries, • a Notice of Contravention, • fines, and/or • imprisonment. 	<ul style="list-style-type: none"> • Managers and supervisors receive training on how to investigate accidents as part of the Supervisor Training Program offered by the Occupational Health and Safety Program. • However, Occupational Health and Safety Program staff indicate that they are not always notified when employees are promoted to management/supervisory positions. • Therefore, there are likely managers and supervisors who have not received adequate training on how to conduct accident investigations. 	Medium.	Significant.	<ul style="list-style-type: none"> • That, in order to provide the appropriate training, the Occupational Health and Safety Program implement controls to ensure they are notified of all employees who are promoted to a management or supervisory position.
Accident investigations not completed in a timely manner.	High. Day to day operations are often more pressing than investigating past actions.	Significant. Untimely accident investigations can result in employee injuries.	<ul style="list-style-type: none"> • Administrative Policy A04-011(B)(8) “Accident/ Incident Reporting and Investigation” requires managers/supervisors to complete their investigations within two working days. • The Occupational Health and Safety Program and the City Manager have stressed to managers and supervisors how important it is to complete investigations in a timely manner, especially as they relate to lost time/ Workers’ Compensation injuries. 	Low.	Significant.	None required.
Corrective action not taken in response to accident investigation findings.	High. Corrective action often involves time and/or additional funding.	Significant. Failure to take corrective action can result in employee injuries.	<ul style="list-style-type: none"> • Investigation Report forms require managers/supervisors to identify corrective action for each accident. • Occupational Health and Safety Program staff review Investigation Reports to ensure the proposed corrective action will be effective. 	Low.	Significant.	None required.

Constraints and Risks, continued

Risk Event	Inherent Risk		Systems, Practices and Controls	Residual Risk		Additional Controls Required
	Likelihood	Impact		Likelihood	Impact	
Disability Assistance						
Return to work plan not prepared.	High. Over 150 return to work cases are handled every year.	Significant. Failure to prepare a return to work plan can result in: <ul style="list-style-type: none"> • additional costs for replacement staff, and • increased insurance premiums. 	<ul style="list-style-type: none"> • The Workers' Compensation Board is responsible for preparing a return to work plan for each employee who has experienced a lost time injury. • The Disability Assistance Program is responsible for preparing a return to work plan for each employee who has experienced a non-work related incident, accident or illness <ul style="list-style-type: none"> ○ Policy requires the preparation of return to work plans. 	Low.	Significant.	None required.
Inappropriate return to work plan prepared.	High. Health issues can be complex, multi-disciplinary and require specialized skill/knowledge.	Significant. Inappropriate return to work plans can result in employee re-injury.	<ul style="list-style-type: none"> • The employee and their health care provider(s) are involved in the original preparation, and periodic reassessment, of each return to work plan. 	Low.	Significant.	None required.
Failure to accommodate.	High. Case law continues to evolve regarding the employer's duty to accommodate.	Significant. Failure to accommodate can result in legal action.	<ul style="list-style-type: none"> • The City of Saskatoon has acknowledged its legal duty to accommodate injured workers. • Accommodation opportunities are flagged throughout the organization on an ongoing basis. 	Low.	Significant.	None required.
Inappropriate accommodation.	High. Accommodations can be complex, multi-disciplinary and require specialized skill/knowledge.	Significant. Inappropriate accommodations can result in employee re-injury.	<ul style="list-style-type: none"> • The employee and their health care provider(s) are involved in the original evaluation, and periodic reassessment, of each accommodation opportunity. • Employees and managers/supervisors have the ability to cancel an accommodation at any time if it is determined to be inappropriate. 	Low.	Significant.	None required.

Recommendations:

6. That the Occupational Health and Safety Program be included in the design review process for all workplace capital projects (construction and renovation).
7. That the Occupational Health and Safety Program, in cooperation with the Corporate Information Services Branch, evaluate alternatives for improving the availability and usefulness of health and safety incident/accident information.
8. That the Occupational Health and Safety Program:
 - inventory all workplaces and develop a system to readily determine the last date of inspection for each;
 - in cooperation with Occupational Health and Safety Committees, develop workplace inspection frequency standards;
 - in cooperation with Occupational Health and Safety Committees, develop and implement workplace-specific inspection checklists;
 - in cooperation with Occupational Health and Safety Committees, develop and update workplace inspection procedures; and
 - ensure that each Occupational Health and Safety Committee receives training on the updated workplace inspection procedures.
9. That, in order to provide the appropriate training, the Occupational Health and Safety Program implement controls to ensure they are notified of all employees who are promoted to a management or supervisory position.

Management Response:

6. **Facilities Branch:**

Agree.

Employee Services Branch:

Agree.

7. **Corporate Information Services Branch:**

Agree.

Employee Services Branch:

Agree.

8. Agree.

9. Agree.

Chapter 6 Safety and Injury Prevention Program

One of the objectives of the audit was to determine if the Occupational Health and Safety Program's components (i.e., structure, functions and activities) are consistent with best practices and/or those advocated in the Occupational Health and Safety industry. We have presented our analysis in two parts – Safety and Injury Prevention (Chapter 6) and Disability Assistance (Chapter 7).

For the most part, the components of the Safety and Injury Prevention Program are consistent with best practices and/or those advocated in the Occupational Health and Safety industry. We are recommending that a long-term strategic plan be prepared, that the Purchasing Policy be amended to require consideration of health and safety issues in purchasing decisions, that a risk assessment be required whenever significant operational changes are made, and that additional controls be implemented to ensure training is provided to all employees as required.

Structure of the Safety and Injury Prevention Program

The Safety and Injury Prevention Program is centralized and is offered through the Employee Services Branch of the Corporate Services Department. Occupational Safety Administrators are assigned to specific Departments or Branches that have a large number of employees (i.e., Transit, Light and Power, Water/Wastewater and Infrastructure Services) in order to allow them to focus on the health and safety issues unique to those workplaces. Although physically located at these remote locations, these staff report functionally and administratively to the Safety Superintendent. This organizational structure appears to be reasonable and appropriate.

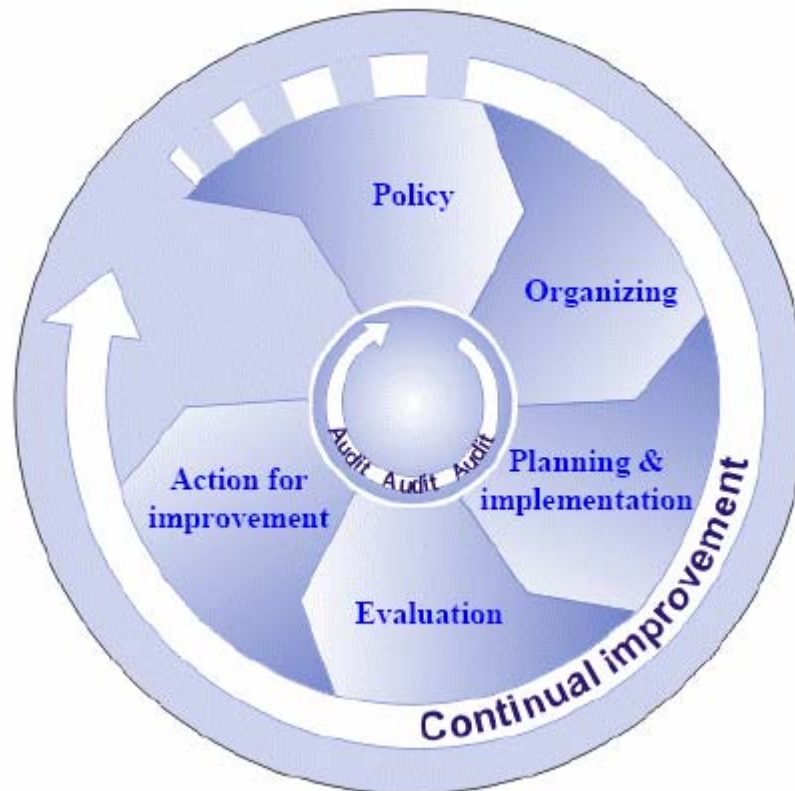
Functions and Activities of the Safety and Injury Prevention Program

In order to determine if the Occupational Health and Safety Program's components are consistent with best practices and/or those advocated in the Occupational Health and Safety industry, the following publications were used to develop a list of criteria against which to evaluate the Program:

- “Setting Up An Occupational Health & Safety Program - A Guide,” Saskatchewan Labour, Occupational Health and Safety Division.
- “Elements of an Occupational Health and Safety Program,” Saskatchewan Labour, Occupational Health and Safety Division.
- “Reviewing an Occupational Health and Safety Program,” Saskatchewan Labour, Occupational Health and Safety Division.
- “Guidelines on Occupational Safety and Health Management Systems, ILO-OSH 2001,” International Labour Office, Geneva, 2001.

The matrix that follows provides a current-state assessment on thirty criteria and includes recommendations to bring the Occupational Health and Safety Program's functions and activities in line with industry best practices. The criteria were developed largely based on the International Labour Office's guidelines, adjusted to reflect Saskatchewan's legislative and regulatory environment.

Figure 6: Main Elements of an Occupational Health and Safety System



Source: "Guidelines on Occupational Safety and Health Management Systems, ILO-OSH 2001," International Labour Office, Geneva, 2001, p. 5.

Our analysis indicates that the Occupational Health and Safety Program fully satisfies **nineteen** criteria, partially satisfies **seven** of the criteria and does not satisfy **four** of the criteria.

Safety and Injury Prevention Program, continued

ELEMENT	CURRENT STATE AND IMPLICATIONS	MET?	RECOMMENDATIONS
POLICY			
Occupational health and safety policy			
<p>The employer, in consultation with employees and union representatives, should set out in writing an Occupational Health and Safety policy that is:</p> <ul style="list-style-type: none"> (a) concise, clearly written and endorsed by the most senior person in the organization; (b) communicated to, and readily accessible by, all employees; and (c) periodically reviewed. 	<p>The City of Saskatoon has developed a series of fifteen Administrative Occupational Health and Safety policies that were <u>developed in consultation with employees and union representatives</u> (through the Occupational Health and Safety Committees).</p> <p>These policies are <u>concise, clearly written and reviewed every three years</u> in accordance with <i>The Occupational Health and Safety Regulations</i>.</p> <p>The existence and requirements of these policies have been communicated to <u>existing employees</u> through training and education, and are communicated to <u>new employees</u> through orientation sessions. The policies are available to all employees in <u>paper and/or electronic form</u>.</p> <p>The <u>City Manager</u> has endorsed these policies.</p>	Yes.	None required.
<p>The Occupational Health and Safety policy should include, as a minimum, the following key principles and objectives to which the organization is committed:</p> <ul style="list-style-type: none"> (a) protecting the health and safety of all employees by preventing work-related injuries, diseases and incidents; (b) complying with relevant Occupational Health and Safety legislation and regulations; (c) ensuring that employees and their union representatives are consulted and encouraged to participate actively in all elements of the Occupational Health and Safety program; and (d) continually improving the performance of the Occupational Health and Safety program. 	<p>Administrative Policy A04-011 “Occupational Health and Safety – General,” states that the purpose of the Occupational Health and Safety Program is to:</p> <ul style="list-style-type: none"> • Provide a safe and healthy workplace which meets or exceeds legislative requirements, • Assist workers in improving their present health status and facilitate their best level of productivity and wellness, • Enhance the workplace by <u>minimizing or eliminating hazards</u> which may result in personal injuries/illnesses, service interruption, fires and property damage, and • <u>Comply</u> with <i>The Occupational Health and Safety Act</i> and <i>Regulations</i>. <p>Each Occupational Health and Safety policy, and the Occupational Health and Safety Employee Handbook, encourages employees and union representatives to <u>participate</u> in the Occupational Health and Safety Program and to <u>improve</u> safety in the workplace.</p>	Yes.	None required.

Safety and Injury Prevention Program, continued

ELEMENT	CURRENT STATE AND IMPLICATIONS	MET?	RECOMMENDATIONS
Employee participation			
The employer should ensure that employees and their union representatives are consulted on all aspects of the Occupational Health and Safety program.	Occupational Health and Safety Program staff maintain a <u>close and cooperative working relationship</u> with the Occupational Health and Safety Committees (which represent the employees and the unions). Occupational Health and Safety <u>policies provide for Committee consultation</u> regarding the existing Occupational Health and Safety Program, and any changes or improvements. Committees <u>meet at least every three months</u> to discuss the various aspects of the Occupational Health and Safety Program.	Yes.	None required.
The employer should make arrangements for employees and their union representatives to have the time and resources to participate actively in the Occupational Health and Safety program.	Active participation in the Occupational Health and Safety Program is <u>encouraged through membership</u> on the Occupational Health and Safety Committees. Committees <u>meet at least every three months</u> to discuss the various aspects of the Occupational Health and Safety Program. All Committee members serve on a volunteer basis. Time spent attending meetings and required training opportunities are <u>considered time at work</u> and paid accordingly.	Yes.	None required.
The employer should ensure an Occupational Health and Safety Committee is established and functioning efficiently.	Due to the size and complexity of civic operations, the City of Saskatoon has established <u>fourteen Occupational Health and Safety Committees</u> . The responsibilities of the Committees have been clearly defined in policy and are being documented in Committee Terms of Reference (on an ongoing basis).	Yes.	None required.
ORGANIZING			
Responsibility and accountability			
The employer and senior management should allocate responsibility, accountability and authority for the development, implementation and performance of the Occupational Health and Safety program and the achievement of relevant objectives. Structures and processes should be established which: (a) ensure that Occupational Health and Safety is a line-management responsibility which is known and accepted at all levels; (b) define and communicate to the members of	Each Occupational Health and Safety policy, and the Occupational Health and Safety Employee Handbook, clearly assign responsibility, accountability and authority to senior management, managers and supervisors, employees, Occupational Health and Safety Committees and the Occupational Health and Safety Program. For the most part, it appears that adequate structures and processes are in place to satisfy the elements listed: <ul style="list-style-type: none"> • 93% of survey respondents who expressed an opinion indicate that they <u>understand what their responsibilities are</u> for the health and safety of their employees. 	Yes, with two exceptions .	See Chapter 2 and Chapter 4.

Safety and Injury Prevention Program, continued

ELEMENT	CURRENT STATE AND IMPLICATIONS	MET?	RECOMMENDATIONS
<p>the organization the responsibility, accountability and authority to identify, evaluate or control hazards and risks;</p> <p>(c) provide effective supervision, as necessary, to ensure the protection of employee health and safety;</p> <p>(d) promote cooperation and communication among members of the organization, including employees and their union representatives, to implement the elements of the Occupational Health and Safety program;</p> <p>(e) establish and implement a clear Occupational Health and Safety policy and measurable objectives;</p> <p>(f) establish effective arrangements to identify and eliminate or control work-related hazards and risks, and promote health at work;</p> <p>(g) establish prevention and health promotion programs;</p> <p>(h) ensure effective arrangements for the full participation of employees and their union representatives in the fulfillment of the Occupational Health and Safety policy;</p> <p>(i) provide appropriate resources to ensure that persons responsible for the Occupational Health and Safety program, including the Occupational Health and Safety Committee, can perform their functions properly; and</p> <p>(j) ensure effective arrangements for the full participation of workers and their representatives in Occupational Health and Safety Committees.</p>	<ul style="list-style-type: none"> • 98% of survey respondents who expressed an opinion indicate that their <u>safety responsibilities are just as important</u> as their other job responsibilities. • 100% of survey respondents who expressed an opinion indicate that they have the <u>authority to correct unsafe practices or conditions</u> in their program. • 100% of survey respondents who expressed an opinion <u>encourage employees to identify and report safety hazards</u>. • 76% of survey respondents who expressed an opinion often <u>observe the work of their employees</u> for the purpose of ensuring their safety and health. • 98% of survey respondents who expressed an opinion <u>encourage employees to provide input and suggestions</u> to improve safety and health in their program. • 97% of survey respondents who expressed an opinion agree that <u>they have opportunities to provide input</u> into the health and safety program. • 86% of survey respondents who expressed an opinion are confident that they <u>know of, and have addressed, all unsafe or hazardous conditions</u> in their program. • 98% of survey respondents who expressed an opinion are confident that <u>each piece of equipment used by employees is adequately maintained and safe to operate</u>. • 93% of survey respondents who expressed an opinion agree that <u>the Occupational Health and Safety Program works effectively with management to prevent injuries</u>. • 88% of survey respondents who expressed an opinion agree that <u>the Occupational Health and Safety Program works effectively with management to promote health in the workplace</u>. <p>However,</p> <ul style="list-style-type: none"> • Specific, <u>measurable objectives have not been established</u> for the Occupational Health and Safety Program (see Chapter 4), and • <u>Managers are not being held accountable for safety performance</u> formally or consistently (see Chapter 2). 		

Safety and Injury Prevention Program, continued

ELEMENT	CURRENT STATE AND IMPLICATIONS	MET?	RECOMMENDATIONS
<p>A person or persons at the senior management level should be appointed with responsibility, accountability and authority for:</p> <p>(a) the development, implementation, periodic review and evaluation of the Occupational Health and Safety program; and</p> <p>(b) periodic reporting to senior management on the performance of the Occupational Health and Safety program.</p>	<p>Administrative Policy A04-011 “Occupational Health and Safety – General” assigns responsibility for <u>administering</u> the corporate Occupational Health and Safety Program, and <u>reporting annually</u> on performance relative to goals, to the General Manager of Corporate Services.</p> <p>For those performance indicators adopted by the Occupational Health and Safety Program (see Chapter 4), the Safety Superintendent reports to the City Manager, General Managers, Managers and Supervisors on a <u>monthly basis, in addition to an annual summary</u>.</p>	Yes.	None required.
Competence and training			
<p>The necessary Occupational Health and Safety training requirements should be defined to ensure that all persons are competent to carry out the health and safety aspects of their duties and responsibilities.</p>	<p>The Occupational Health and Safety Program has prepared a listing of the <u>fifty-eight different training topics that are required pursuant to <i>The Occupational Health and Safety Act and Regulations</i></u> (e.g., harassment, violence, shift work, risk from vehicular traffic, thermal conditions, aerial devices, confined spaces, chemical substances, etc.).</p>	Yes.	None required.
<p>Training programs should:</p> <p>(a) cover all members of the organization, as appropriate;</p> <p>(b) be conducted by competent persons;</p> <p>(c) provide effective and timely initial and refresher training at appropriate intervals;</p> <p>(d) include participants' evaluation of their comprehension and retention of the training;</p> <p>(e) be reviewed periodically, and modified as necessary, to ensure relevance and effectiveness; and</p> <p>(f) be documented.</p>	<p>Although records are maintained regarding the employees who <i>have</i> received different types of training, there is no system in place to identify all of the employees who <i>should</i> be receiving different types of training. Occupational Health and Safety Program staff indicate that it is <u>likely there are employees who have not received all of the training they require</u> to carry out their work safely.</p> <p>Some training opportunities can be provided by <u>appropriately certified in-house staff</u>. When in-house staff do not have the required qualifications, <u>professionals</u> are brought in.</p> <p><u>New employee orientation sessions</u> are provided throughout the year. A certain portion of each session is devoted to Occupational Health and Safety, and varies based on the program area (e.g., the Parks Branch orientation session has more time devoted to safety than the session at City Hall).</p> <p><u>Certain refresher training sessions are offered each year</u>, typically for those employees who must be re-certified after a certain period of time (e.g., WHMIS, first aid/CPR, etc.).</p> <p>There is <u>no formal system in place to gauge participant comprehension, retention and satisfaction</u> with training sessions (e.g.,</p>	Partially.	<p>10. That the Occupational Health and Safety Program:</p> <ul style="list-style-type: none"> • implement a system that will identify, for each type of training required pursuant to <i>The Occupational Health and Safety Act and Regulations</i>, all employees who should, but have not yet, received training; • develop a plan to address training gaps identified; • implement a system to gauge participant comprehension, retention and

Safety and Injury Prevention Program, continued

ELEMENT	CURRENT STATE AND IMPLICATIONS	MET?	RECOMMENDATIONS
	<p>post-session quizzes, participant satisfaction surveys, etc.). Survey responses indicate that improvements could be made in this area:</p> <ul style="list-style-type: none"> • 20% of survey respondents who expressed an opinion indicate that <u>not all employees in their program are properly trained in health and safety</u> rules and work practices. • 19% of survey respondents who expressed an opinion indicate that <u>they are unable to provide refresher training on a regular basis</u> to employees in their program. • 28% of survey respondents who expressed an opinion indicate that <u>there are not enough training opportunities available to employees</u> in their program regarding health and safety. 		<p>satisfaction with training sessions;</p> <ul style="list-style-type: none"> • use the feedback obtained from participants to assess the relevance and effectiveness of training sessions, with appropriate modifications pursued as required; and • obtain input from managers, supervisors and Occupational Health and Safety Committees as to the types of initial and refresher training opportunities required throughout the organization.
Communication			
<p>Arrangements and procedures should be established and maintained for:</p> <p>(a) ensuring the internal communication of Occupational Health and Safety information between relevant levels and functions of the organization; and</p> <p>(b) ensuring that the concerns, ideas and inputs of workers and their representatives on Occupational Health and Safety matters are received, considered and responded to.</p>	<p>Internal communication processes include new/updated policy <u>education and training sessions, Safety Alerts</u> (i.e., interdepartmental memos regarding health and safety issues) and <u>“toolbox” safety meetings</u>. Occupational Health and Safety Committees receive ideas, concerns and input from employees and ensure they are addressed.</p> <ul style="list-style-type: none"> • 91% of survey respondents who expressed an opinion agree that there is <u>good communication within the organization about safety issues</u> that affect them and their employees. • 95% of survey respondents who expressed an opinion agree that the <u>information they receive from the Occupational Health and Safety Program regarding accidents/incidents is useful</u> for helping them ensure the health and safety of their employees. 	Yes	None required.

Safety and Injury Prevention Program, continued

ELEMENT	CURRENT STATE AND IMPLICATIONS	MET?	RECOMMENDATIONS
PLANNING AND IMPLEMENTATION			
Program planning, development and implementation			
<p>Arrangements should be made for adequate and appropriate Occupational Health and Safety planning. These planning arrangements should contribute to the protection of health and safety at work, and should include:</p> <ul style="list-style-type: none"> (a) a clear definition, priority setting and quantification, where appropriate, of the organization's Occupational Health and Safety objectives; (b) the preparation of a plan for achieving each objective, with defined responsibility and clear performance criteria indicating what is to be done by whom and when; (c) the selection of measurement criteria for confirming that the objectives are achieved; and (d) the provision of adequate resources, including human and financial resources and technical support, as appropriate. 	<p>The elements listed are, in essence, describing the components of a strategic plan. Although an annual Business Plan is prepared, <u>a long-term strategic plan has not been prepared</u> for the Occupational Health and Safety Program.</p>	No.	<p>11. That a long-term strategic plan be prepared for the Occupational Health and Safety Program.</p>
Occupational health and safety objectives			
<p>Consistent with the Occupational Health and Safety policy, measurable Occupational Health and Safety objectives should be established, which are:</p> <ul style="list-style-type: none"> (a) focused towards continually improving Occupational Health and Safety program performance; (b) realistic and achievable; (c) documented, and communicated to all relevant functions and levels of the organization; and (d) periodically evaluated and, if necessary, updated. 	<p>As discussed in Chapter 4, although the overall corporate goal is to decrease the number, frequency, severity and cost of injuries, <u>specific objectives have not been established.</u></p>	No.	<p>See Chapter 4.</p>

Safety and Injury Prevention Program, continued

ELEMENT	CURRENT STATE AND IMPLICATIONS	MET?	RECOMMENDATIONS
Hazard prevention			
<i>Prevention and control measures</i>			
<p>Hazards and risks to employee health and safety should be identified and assessed on an ongoing basis. Preventive and protective measures should be implemented in the following order of priority:</p> <p>(a) eliminate the hazard/risk;</p> <p>(b) control the hazard/risk at source, through the use of engineering controls or organizational measures;</p> <p>(c) minimize the hazard/risk by the design of safe work systems, which include administrative control measures; and</p> <p>(d) where residual hazards/risks cannot be controlled by collective measures, the employer should provide appropriate personal protective equipment at no cost, and should implement measures to ensure its use and maintenance.</p>	<p>Administrative Policies A04-011(B)(2) “Hazard Identification, Monitoring and Control” and A04-011(B)(3) “Workplace Risk Assessments” address all of the elements listed. General Managers, Managers and Supervisors are responsible for <u>identifying, evaluating, monitoring, and controlling or eliminating hazards and risks</u>, with the assistance of the Occupational Health and Safety Program when required.</p> <ul style="list-style-type: none"> • 83% of survey respondents who expressed an opinion agree that <u>employees have enough time to follow safety rules and procedures</u>. • 90% of survey respondents who expressed an opinion agree that <u>all safety rules and procedures need to be followed to get the job done safely</u>. • 98% of survey respondents who expressed an opinion indicate that <u>the proper personal protective equipment is always available</u> for their employees. • 94% of survey respondents who expressed an opinion <u>strictly enforce the use of personal protective equipment</u>. 	Yes.	None required.
<i>Management of change</i>			
<p>A workplace hazard identification and risk assessment should be carried out before any modification or introduction of new work methods, materials, processes or machinery. Such assessment should be done in consultation with workers, their union representatives and the Occupational Health and Safety Committee.</p>	<p>Workplace risk assessments are largely done in response to identified trends in incidents. There is <u>no process in place</u> to ensure health and safety issues are considered when operational changes are made in the workplace.</p>	No.	<p>12. That the Occupational Health and Safety Program amend Administrative Policy A03-011(A)(3) “Workplace Risk Assessments” to require a workplace risk assessment to be conducted before the modification or introduction of new work methods, materials, processes or machinery.</p>

Safety and Injury Prevention Program, continued

ELEMENT	CURRENT STATE AND IMPLICATIONS	MET?	RECOMMENDATIONS
<i>Procurement</i>			
<p>Procedures should be established and maintained to ensure that:</p> <p>(a) compliance with health and safety requirements for the organization is identified, evaluated and incorporated into purchasing specifications;</p> <p>(b) legislation and regulations and the organization's own Occupational Health and Safety requirements are identified prior to the procurement of goods and services; and</p> <p>(c) arrangements are made to achieve conformance to the requirements prior to their use.</p>	<p>Over time, the Occupational Health and Safety Program has developed a process whereby <u>health and safety issues are integrated into some purchasing decisions</u> (e.g., garbage trucks equipped with air-ride to prevent back injuries, pool chemical purchases in smaller containers to prevent over-exertion injuries).</p> <p>Beyond Canadian Standards Association (CSA) specifications, <u>consideration of occupational health and safety is not a Purchasing Policy requirement</u>. In some cases, injuries or accidents have occurred that could have been prevented had such issues been included in the decision making process.</p>	Partially.	<p>13. That the Occupational Health and Safety Program, in cooperation with Inventory and Disposal Services, amend the Purchasing Policy to include the requirement to consider occupational health and safety in purchasing decisions.</p>
<i>Contracting</i>			
<p>Arrangements should be established and maintained for ensuring that the organization's health and safety requirements, or at least the equivalent, are applied to contractors and their workers.</p>	<p>Administrative Policy A04-011(B)(10) "Safety Compliance of Contractors" <u>requires contractors to comply with <i>The Occupational Health and Safety Act</i> and <i>Regulations</i></u> and City of Saskatoon safety rules and procedures.</p>	Yes.	None required.
<p>Arrangements for contractors working on site should:</p> <p>(a) include Occupational Health and Safety criteria in procedures for evaluating and selecting contractors;</p> <p>(b) establish effective ongoing communication and coordination between appropriate levels of the organization and the contractor prior to commencing work. This should include provisions for communicating hazards and the measures to prevent and control them;</p> <p>(c) include arrangements for reporting of work-related injuries and incidents among the contractors' workers while performing work for the organization;</p>	<p>Administrative Policy A04-011(B)(10) "Safety Compliance of Contractors" addresses all but one of the items listed:</p> <ul style="list-style-type: none"> • The Project Manager is to ensure appropriate occupational health and safety <u>clauses are included in the Standard Contract Document</u>. • <u>Work-site orientation</u> (including identification and control of potential hazards of the worksite), <u>pre-job safety meetings and on-going safety meetings</u> are required. • Occupational health and safety <u>performance of the contractor is monitored</u> through inspections and documentation of substandard practices and/or conditions. • The Project Manager has the <u>authority to issue stop work or corrective action orders</u> if substandard practices and/or conditions are not corrected. 	Yes.	None required.

Safety and Injury Prevention Program, continued

ELEMENT	CURRENT STATE AND IMPLICATIONS	MET?	RECOMMENDATIONS
<p>(d) provide relevant workplace safety and health hazard awareness and training to contractors or their workers prior to commencing work and as work progresses, as necessary;</p> <p>(e) regularly monitor Occupational Health and Safety performance of contractor activities on site; and</p> <p>(f) ensure that on-site Occupational Health and Safety procedures and arrangements are followed by the contractor(s).</p>	<ul style="list-style-type: none"> • The Corporate Services Department is to: <ul style="list-style-type: none"> ○ Incorporate occupational health and safety considerations into <u>tender specifications and routine reference checks</u> of contractors, and ○ Ensure Project Manager <u>inspection reports are noted when awarding future contracts</u>. <p>Although not specified in Policy, <u>contractors are to report work-related injuries and incidents</u> experienced while performing work for the City of Saskatoon.</p>		
EVALUATION			
Performance monitoring and measurement			
<p>Performance monitoring and measurement should:</p> <p>(a) be used as a means of determining the extent to which Occupational Health and Safety policy and objectives are being implemented and risks are controlled;</p> <p>(b) include both active and reactive monitoring, and not be based only upon work related injury, disease and incident statistics; and</p> <p>(c) be recorded.</p>	<p>The performance indicators adopted by the Occupational Health and Safety Program consist of <u>injury frequency, severity and cost</u>. We are recommending that the set of indicators used by the Program be expanded to include more <u>positive performance indicators that are focused on objectives and risks</u>.</p>	Partially.	See Chapter 4.
<p>Monitoring should provide:</p> <p>(a) feedback on Occupational Health and Safety performance;</p> <p>(b) information to determine whether the day-to-day arrangements for hazard and risk identification, prevention and control are in place and operating effectively; and</p> <p>(c) the basis for decisions about improvement in hazard identification and risk control, and the Occupational Health and Safety program.</p>	<p>The Occupational Health and Safety Program utilizes <u>injury frequency, severity and cost statistics</u> to improve safety in the workplace. However, as discussed in Chapter 4, these statistics focus on program failures rather than program successes.</p> <p>The set of <u>positive performance indicators recommended</u> in Chapter 4 should assist the Occupational Health and Safety Program in satisfying the elements listed.</p>	Partially.	See Chapter 4.

Safety and Injury Prevention Program, continued

ELEMENT	CURRENT STATE AND IMPLICATIONS	MET?	RECOMMENDATIONS
<p>Active monitoring should contain the elements necessary to have a proactive system and should include:</p> <p>(a) monitoring of the achievement of specific plans, established performance criteria and objectives;</p> <p>(b) the systematic inspection of work systems, premises, plant and equipment;</p> <p>(c) surveillance of the working environment, including work organization;</p> <p>(d) surveillance of employee health, where appropriate, through suitable medical monitoring or follow-up of workers for early detection of signs and symptoms of harm to health in order to determine the effectiveness of prevention and control measures; and</p> <p>(e) compliance with applicable legislation and regulations.</p>	<p>The Occupational Health and Safety Program performs the following in order to proactively identify and correct unsafe working conditions:</p> <ul style="list-style-type: none"> • <u>Inspections</u>: performed in conjunction with Occupational Health and Safety Committees; General Managers are to participate per Administrative Policy A04-011(B)(3) “Planned Inspections.” • <u>Surveillance of the working environment</u>: readings at a point-in-time or over a period of time, as required pursuant to legislation and regulations (e.g., noise levels, air quality, etc.). • <u>Workplace risk assessments</u>: carried out when hazards are reported or suspected. • <u>Surveillance of employee health</u>: performed when appropriate, mainly regarding potential hearing loss (e.g., audiograms). • <u>Corrective Action</u>: monitoring implementation of corrective action identified through inspection and/or by the Department of Labour. <p>Survey responses indicate improvements could be made in this area:</p> <ul style="list-style-type: none"> • 22% of survey respondents who expressed an opinion indicate that <u>health and safety inspections of their program area by the Occupational Health and Safety Committee are not conducted regularly.</u> • 63% of survey respondents who expressed an opinion indicate that <u>health and safety inspections of their program area by senior management are not conducted regularly.</u> • 43% of survey respondents who expressed an opinion would <u>appreciate health and safety inspections of their program to occur more often.</u> • 56% of survey respondents who expressed an opinion indicate that they <u>do not conduct periodic safety meetings</u> with their employees. • 54% of survey respondents who expressed an opinion are <u>not able to conduct health and safety inspections</u> of their program areas regularly. • 41% of survey respondents who expressed an opinion <u>would like to conduct health and safety inspections of their program area more often.</u> 	<p>Partially.</p>	<p>See Chapter 4.</p>

Safety and Injury Prevention Program, continued

ELEMENT	CURRENT STATE AND IMPLICATIONS	MET?	RECOMMENDATIONS
<p>Reactive monitoring should include the identification, reporting and investigation of:</p> <ul style="list-style-type: none"> (a) work-related injuries, diseases and incidents; (b) other losses, such as damage to property; (c) deficient safety and health performance, and Occupational Health and Safety program failures; and (d) workers' rehabilitation and health-restoration programs. 	<p>The Occupational Health and Safety Program:</p> <ul style="list-style-type: none"> • <u>Receives all reports</u> of work-related injuries, diseases and incidents, and investigates certain reports, • <u>Receives all Notices of Contravention</u> from the Department of Labour, and monitors to ensure corrective action is taken, and • <u>Receives and reviews all Workers' Compensation Board correspondence</u> (e.g., statistics, cost summaries, etc.). 	Yes.	None required.
Investigation of work-related injuries, diseases and incidents, and their impact on health and safety performance			
<p>The investigation of the origin and underlying causes of work-related injuries, diseases and incidents should identify any failures in the Occupational Health and Safety program and should be documented.</p>	<p><u>Each work-related incident is reported</u> to the Occupational Health and Safety Program through an Investigation Report. Managers and Supervisors must <u>investigate all Class A⁶ and Class B⁷ incidents</u>; the Occupational Health and Safety Program is only involved in the investigation upon request.</p> <p>Managers and Supervisors are required to indicate the <u>underlying cause(s) of each incident, and the actions that will be taken to prevent recurrence</u>. Occupational Health and Safety Program staff review each report to ensure the assessment of underlying cause(s), and proposed corrective action, are reasonable.</p> <p><u>Trends in underlying cause(s) are monitored</u> by the Occupational Health and Safety Program, and corrective measures implemented as required.</p>	Yes.	None required.
<p>The results of such investigations should be communicated to the Occupational Health and Safety Committee and the committee should make appropriate recommendations.</p>	<p>Occupational Health and Safety Committee members receive a copy of <u>each Investigation Report related to their workplace</u>, for their review and recommendations.</p>	Yes.	None required.
<p>Reports produced by external investigative agencies should be acted upon in the same manner as internal investigations.</p>	<p>All <u>Department of Labour Inspection Reports and Notices of Contravention</u> are investigated as to underlying cause(s) and corrective action(s) required to prevent recurrence.</p>	Yes.	None required.

⁶ Class A Hazard: a condition or practice likely to cause permanent disability, loss of life or body part, and/or extensive loss of structure, equipment or material.

⁷ Class B Hazard: a condition or practice likely to cause serious injury or illness, resulting in temporary disability or property damage that is disruptive, but not extensive.

Safety and Injury Prevention Program, continued

ELEMENT	CURRENT STATE AND IMPLICATIONS	MET?	RECOMMENDATIONS
Audit			
<p>Arrangements to conduct periodic audits should be established in order to determine whether the Occupational Health and Safety program and its elements are in place, adequate, and effective in protecting the health and safety of employees and preventing incidents.</p>	<p>The Occupational Health and Safety Program engages <u>qualified professionals to perform independent audits in high risk areas throughout the organization</u> (e.g., Water and Waste Water Treatment Branch, Saskatoon Light and Power, Water Treatment Plant/Water Meter Section, Facilities Branch, Transit Services Branch, Parks Branch, Public Works Branch and Fire and Protective Services).</p>	Yes.	None required.
<p>The audit should include an evaluation of the organization's Occupational Health and Safety program elements or a subset of these, as appropriate. The audit should cover:</p> <ul style="list-style-type: none"> (a) Occupational Health and Safety policy; (b) worker participation; (c) responsibility and accountability; (d) competence and training; (e) Occupational Health and Safety program documentation; (f) communication; (g) program planning, development and implementation; (h) prevention and control measures; (i) management of change; (j) emergency prevention, preparedness and response; (k) procurement; (l) contracting; (m) performance monitoring and measurement; (n) investigation of work-related injuries, diseases and incidents, and their impact on safety and health performance; (o) preventive and corrective action; and (p) continual improvement. 	<p>The independent audits listed above <u>have each included evaluation of the elements listed.</u></p>	Yes.	None required.

Safety and Injury Prevention Program, continued

ELEMENT	CURRENT STATE AND IMPLICATIONS	MET?	RECOMMENDATIONS
Audits should be conducted by competent persons internal or external to the organization who are independent of the activity being audited.	The Occupational Health and Safety Program ensures that, if a professional organization is engaged to perform the independent audit, they are <u>properly qualified for the industry involved</u> . Additionally, four of the Occupational Health and Safety Program's Safety Administrators are <u>certified safety auditors</u> who can audit program areas for which they have no direct responsibility.	Yes.	None required.
The audit results and audit conclusions should be communicated to those responsible for corrective action.	Audit results and conclusions are shared with the applicable <u>General Manager, Branch Manager, Managers and Supervisors and Occupational Health and Safety Committee</u> .	Yes.	None required.
Management review			
<p>Management reviews should:</p> <ul style="list-style-type: none"> (a) evaluate the overall strategy of the Occupational Health and Safety program to determine if it meets performance objectives; (b) evaluate the Occupational Health and Safety program's ability to meet the overall needs of the organization and its stakeholders, including its employees and the regulatory authorities; (c) evaluate the need for changes to the Occupational Health and Safety program, including policy and objectives; (d) identify the action necessary to remedy any deficiencies in a timely manner, including adaptations of other aspects of the organization's management structure and performance measurement; (e) provide the feedback direction, including the determination of priorities, for meaningful planning and continual improvement; (f) evaluate progress towards the organization's Occupational Health and Safety objectives and corrective action activities; and (g) evaluate the effectiveness of follow-up actions from earlier management reviews. 	The elements listed are, in essence, describing the strategic planning process. Although an annual Business Plan is prepared, a <u>long-term strategic plan has not been prepared</u> for the Occupational Health and Safety Program.	No.	<i>Elsewhere in this chapter we are recommending that the Occupational Health and Safety Program develop a long-term strategic plan.</i>

Safety and Injury Prevention Program, continued

ELEMENT	CURRENT STATE AND IMPLICATIONS	MET?	RECOMMENDATIONS
ACTION FOR IMPROVEMENT			
<p>Arrangements should be established and maintained for the continual improvement of the Occupational Health and Safety program. These arrangements should take into account:</p> <ul style="list-style-type: none"> (a) the Occupational Health and Safety objectives of the organization; (b) the results of hazard and risk identifications and assessments; (c) the results of performance monitoring and measurements; (d) the investigation of work-related injuries, diseases and incidents, and the results and recommendations of audits; (e) the outcomes of the management review; (f) the recommendations for improvement from all members of the organization, including the Occupational Health and Safety Committee; (g) changes in legislation and regulations; (h) new relevant information; and (i) the results of health protection and promotion programs. 	<p>The Occupational Health and Safety Program is strongly committed to protecting the health and safety of employees throughout the organization. Program staff have worked hard to gain management commitment to, and support of, the Occupational Health and Safety Program. The success of these efforts is evident in survey responses.</p> <p>The set of <u>positive performance indicators recommended</u> in Chapter 4 and the development of a <u>long-term strategic plan</u> should assist the Occupational Health and Safety Program in continuing to improve safety in the workplace.</p>	Partially.	See Chapter 4.

Recommendations:

10. That the Occupational Health and Safety Program:
 - implement a system that will identify, for each type of training required pursuant to *The Occupational Health and Safety Act and Regulations*, all employees who should, but have not yet, received training;
 - develop a plan to address training gaps identified;
 - implement a system to gauge participant comprehension, retention and satisfaction with training sessions;
 - use the feedback obtained from participants to assess the relevance and effectiveness of training sessions, with appropriate modifications pursued as required; and
 - obtain input from managers, supervisors and Occupational Health and Safety Committees as to the types of initial and refresher training opportunities required throughout the organization.
11. That a long-term strategic plan be prepared for the Occupational Health and Safety Program.
12. That the Occupational Health and Safety Program amend Administrative Policy A03-011(A)(3) “Workplace Risk Assessments” to require a workplace risk assessment to be conducted before the modification or introduction of new work methods, materials, processes or machinery.
13. That the Occupational Health and Safety Program, in cooperation with Inventory and Disposal Services, amend the Purchasing Policy to include the requirement to consider occupational health and safety in purchasing decisions.

Management Response:

10. Agree.
11. Agree.
12. Agree.
13. Agree.

Chapter 7 Disability Assistance Program

One of the objectives of the audit was to determine if the Occupational Health and Safety Program's components (i.e., structure, functions and activities) are consistent with best practices and/or those advocated in the Occupational Health and Safety industry. We have presented our analysis in two parts – Safety and Injury Prevention (Chapter 6) and Disability Assistance (Chapter 7).

The return to work program for work related injuries is administered by the Saskatchewan Workers' Compensation Board. Although the Occupational Safety Superintendent provides some support to the Workers' Compensation Board, the City of Saskatoon has no control over the return to work process in these cases. Therefore, we have excluded this process from our audit.

The Disability Assistance Program administers the return to work program for non-work related injuries and illnesses, and for work related cases that the Workers' Compensation Board has transferred to the City of Saskatoon (i.e., the employee can not return to their pre-injury position). The components of the Disability Assistance Program are consistent with best practices and/or those advocated in the Occupational Health and Safety industry.

Structure of Disability Assistance Program

The Disability Assistance Program is centralized and offered through the Employee Services Branch of the Corporate Services Department. This organizational structure appears to be reasonable and appropriate. Research indicates that the Cities of Calgary, Edmonton, Winnipeg and Regina all have centralized programs offered through their Corporate Services Departments.

It is our understanding that in the 2006 operating budget, the Employee Services Branch Manager intends to request an increase in the staff years dedicated to the program. This appears reasonable given that:

- there is currently only one person allocated to the program, and this person has over 130 active cases to manage; and
- the number of active case files is expected to increase as the updated Disability Assistance process will require mandatory participation in the Disability Assistance Program after 10 days of absence (if the employee requires the Program's services).

Functions and Activities of the Disability Assistance Program

When an employee has experienced a non-work related injury or illness, or it has been determined that an employee is unable to return to their original job after a work related injury, the Disability Assistance Program begins. According to the Saskatchewan Workers' Compensation Board, "Employers and unions in Canada are required to make every reasonable effort, short of undue hardship, to accommodate disabled (injured or ill) workers. Duty to Accommodate is not a WCB regulation; it is a legal concept that has evolved out of case law, human rights and labour standards legislation⁸."

Successful and effective Disability Assistance programs have the following attributes.

Commitment to the Program

A well designed and effective Disability Assistance program will have many direct and indirect benefits for both the employer and the employee. Commitment to the program is required at all levels of the organization in order to achieve these benefits.

Benefits to the Employer	Benefits to the Employee
<ul style="list-style-type: none">• Decrease insurance premium rates• Reduce medical and disability costs• Retain skilled and experienced staff• Avoid overtime, recruiting, hiring, training and salary costs for replacement workers• Improve employee morale• Strengthen employee relations• Enhance the corporate image	<ul style="list-style-type: none">• Shorten recovery time• Remain active and productive• Reduce or eliminate stress, boredom and depression• Receive support from, and contact with, coworkers and friends• Maintain job skills• Minimize pain and suffering• Maintain family and social lifestyle

The City of Saskatoon has expressed its commitment to accommodate employees who have experienced an injury or illness through the development of a Disability Assistance Program. This Program was established in May 2001 and is currently being reviewed. Although the Program's policy is not in standard policy form, the document contains all of the necessary aspects of an Administrative policy (e.g., purpose, definitions, principles, responsibilities). One aspect that is absent, however, is a description of the benefits of a Disability Assistance program, from both the employer's and employee's perspectives.

It is our understanding that in some cases it has been difficult gaining commitment to the Disability Assistance program. Management intends to "roll out" the updated Disability Assistance policy by providing an educational session to all managers and supervisors. This session would explain the program, its benefits and the responsibilities of all affected parties, with the goal of gaining commitment to the program. Managers and supervisors would then be responsible for educating their workforce.

⁸ "Focus on Return-to-Work," The Prevention, Safety and Return-to-Work Department of the Saskatchewan Workers' Compensation Board, p. 1.

Communication With Employees While Off Work

The Texas Workers Compensation Commission indicates that:

“Maintaining regular communication with the injured worker and with the treating doctor is vital to the return to work process...It is easy for an injured worker who cannot immediately return to work to become “disemployed” or disconnected from his or her employer. The longer an injured worker remains off work, the more probable it is that this detrimental separation will occur. Maintaining the employer-employee relationship with regular communication will help reduce the probability of lengthy lost time⁹.”

Although this publication focuses on work related injuries, the point can also be applied to non-work related injuries or illnesses. The Disability Assistance policy assigns responsibility for maintaining this communication link to both the employee and the manager/supervisor.

However, survey results indicate that this is not always occurring.

- 25% of survey respondents who expressed an opinion do not maintain regular contact with employees when they are away due to injury or illness.

Management intends to stress the importance of, and responsibility for, this communication link when the updated Disability Assistance Program is implemented.

Clear Understanding of the Employee’s Abilities and Restrictions

Injuries or illnesses may affect different people in different ways, and may lead to different accommodation measures being taken.

A clear and accurate assessment of the employee’s abilities and restrictions are obtained through the use of health care provider(s) reports and assessments, Vocational Evaluations (i.e., a qualified professional’s assessment of an employee’s cognitive function and level of comprehension), Functional Capacity Evaluations (i.e., a qualified professional’s assessment of the physical and cognitive abilities of an ill/injured individual) and Psychological Assessments (i.e., a qualified professional’s assessment of an employee’s psychological condition).

Assessment of Job Duties

In order to understand what a job position regularly demands of an employee, an assessment should be completed for all significant tasks. Such assessments then also assist in the process of identifying job duties that have to be temporarily or permanently suspended and/or altered.

An understanding of the demands of a job position is obtained through the use of Job Demand Analyses (JDA’s) that can either prepared by a qualified professional (e.g., a

⁹ “Developing a Return to Work Program – A Resource for Employers,” Texas Workers Compensation Commission, Medical Review Division, 2003-2004, p. 17.

comprehensive assessment by an Occupational Therapist) for a fee, or by the employee's manager/supervisor. These evaluations may be completed for an employee's original job position and/or other job positions that may be suitable alternatives.

Information to Help Health Care Providers Understand the Employee's Regular Job and the Disability Assistance Program

The more information the employee's health care provider(s) has regarding the employee's job, the Disability Assistance program and options available to the employee, the more likely they are to be confident that their patient's health will not be compromised by participating in the Disability Assistance program.

A copy of the employee's pre-injury or illness job description and a copy of the applicable Job Demand Analysis (if available) are provided to the employee's health care provider(s) when the Disability Assistance process commences. The Occupational Health Consultant describes the Disability Assistance program to the employee's health care provider(s), and management is in the process of developing a pamphlet in order to aid in the process.

Identification of Alternatives

By comparing the employee's abilities to the demands of the employee's original job position, and/or other job positions, opportunities for meaningful and productive work are identified.

The Disability Assistance program pursues alternatives through one of the following:

- Accommodating the employee in their own position: identifying and pursuing opportunities to modify the employee's existing job in order to accommodate their restrictions (e.g., graduated hours, technical aids, modified duties, etc.), or
- Accommodating the employee in alternate work: identifying and pursuing opportunities to place an employee in a different job for which they are appropriately qualified.

Involvement of Employees in Determining Their Return to Work

It is important to involve employees in the decision making process in order to foster a sense of control, empowerment, ownership and responsibility.

Each opportunity is evaluated in collaboration with the employee, the employee's manager/supervisor, the employee's health care provider(s), union representative (if required) and Occupational Health Consultant.

Monitoring an Employee's Progress and Work Assignments

It is important to monitor an employee's progress and state of health throughout the accommodation process in order to ensure the chosen course of action is appropriate and avoids aggravating and/or worsening the injury or illness.

Throughout the accommodation process, the employee, the employee's manager/supervisor, health care provider(s) and the Occupational Health Consultant monitor the employee's progress in order to ensure the accommodation is working effectively and to identify and respond to any problems or concerns.

Accommodations are provided with the understanding that there is no probationary period – if, at any time, the employee or manager/supervisor is of the opinion that the placement is not working or the employee's health is being negatively impacted, it will be cancelled and the opportunity identification process will begin again.

Recommendations:

- 14. That the benefits of a Disability Assistance program, from both the employer's and employee's perspective, be included in the Disability Assistance Program policy.**
- 15. That an organization-wide education program be developed to support the implementation of the updated Disability Assistance policy.**

Management Response:

14. Agree.

15. Agree.

Chapter 8 Implementation Plan

RECOMMENDATION	MANAGEMENT RESPONSE	IMPLEMENTATION DATE
<p>1. That the City Manager ensure health and safety is considered in the annual performance reviews of all General Managers and operational managers/ supervisors.</p>	<p>City Manager's Office: Agree.</p>	<p>As reviews are completed.</p>
<p>2. That management of the Occupational Health and Safety program implement controls to ensure "near miss" incidents/accidents are reported.</p>	<p>Agree.</p>	<p>Will promote through the OHC committees by December 2006.</p>
<p>3. That management of the Occupational Health and Safety program develop an employee safety survey, administer the survey at least every three years, and use the survey results to identify opportunities for improvement and/or areas of concern.</p>	<p>Agree.</p>	<p>Will complete first survey review by end of 2006.</p>
<p>4. That the Occupational Health and Safety Program:</p> <ul style="list-style-type: none"> • adopt positive performance indicators, in addition to current performance indicators, that may include, but do not necessarily have to be limited to, those presented in this report; • establish specific objectives for each performance indicator adopted; • implement a system to monitor actual performance in relation to each performance indicator adopted; and • report to the General Manager of Corporate Services and the City Manager, on an annual basis, actual performance in relation to performance objectives. 	<p>Agree.</p>	<p>Will select some, but not all, positive performance indicators, such as Participation, Communications and Skills, and Management of Work Processes.</p> <p>Will report to the General Manager of Corporate Services and the City Manager on an annual basis 2006 year end-report.</p>

Implementation Plan, continued

RECOMMENDATION	MANAGEMENT RESPONSE	IMPLEMENTATION DATE
<p>5. That the Disability Assistance Program:</p> <ul style="list-style-type: none"> • adopt performance indicators, in addition to current performance indicators, that may include, but do not necessarily have to be limited to, those presented in this report; • establish specific objectives for each performance indicator adopted; • implement a system to monitor actual performance in relation to each performance indicator adopted; and • report to the General Manager of Corporate Services and the City Manager, on an annual basis, actual performance in relation to performance objectives. 	<p>Agree.</p>	<p>Will select relative performance indicators, but not all.</p> <p>Will report to General Manager of Corporate Services and City Manager for 2006 Year-End Report.</p>
<p>6. That the Occupational Health and Safety Program be included in the design review process for all workplace capital projects (construction and renovation).</p>	<p><u>Facilities Branch:</u> Agree.</p> <p><u>Employee Services Branch:</u> Agree.</p>	<p>Will be informed by the Facilities Branch as projects arise.</p>
<p>7. That the Occupational Health and Safety Program, in cooperation with the Corporate Information Services Branch, evaluate alternatives for improving the availability and usefulness of health and safety incident/accident information.</p>	<p><u>Corporate Information Services Branch:</u> Agree.</p> <p><u>Employee Services Branch:</u> Agree.</p>	<p>To be determined in consultation with CIS.</p>
<p>8. That the Occupational Health and Safety Program:</p> <ul style="list-style-type: none"> • inventory all workplaces and develop a system to readily determine the last date of inspection for each; • in cooperation with Occupational Health and Safety Committees, develop workplace inspection frequency standards; • in cooperation with Occupational Health and Safety Committees, develop and implement workplace-specific inspection checklists; • in cooperation with Occupational Health and Safety Committees, develop and update workplace inspection procedures; and • ensure that each Occupational Health and Safety Committee receives training on the updated workplace inspection procedures. 	<p>Agree.</p>	<p>Will implement a form (check list) and train Committee members on inspections. This would be additional training that members receive from the Department of Labour. This will be ongoing because OHC members rotate in and out of the Committee.</p> <p>Implementation by end of 2006.</p>

Implementation Plan, continued

RECOMMENDATION	MANAGEMENT RESPONSE	IMPLEMENTATION DATE
<p>9. That, in order to provide the appropriate training, the Occupational Health and Safety Program implement controls to ensure they are notified of all employees who are promoted to a management or supervisory position.</p>	Agree.	Dependant on available resources and the ability to design a notification system for promotions.
<p>10. That the Occupational Health and Safety Program:</p> <ul style="list-style-type: none"> • implement a system that will identify, for each type of training required pursuant to <i>The Occupational Health and Safety Act and Regulations</i>, all employees who should, but have not yet, received training; • develop a plan to address training gaps identified; • implement a system to gauge participant comprehension, retention and satisfaction with training sessions; • use the feedback obtained from participants to assess the relevance and effectiveness of training sessions, with appropriate modifications pursued as required; and • obtain input from managers, supervisors and Occupational Health and Safety Committees as to the types of initial and refresher training opportunities required throughout the organization. 	Agree.	<p>Will set up a computerized program that deals with all regulated training.</p> <p>Completion by mid 2007.</p>
<p>11. That a long-term strategic plan be prepared for the Occupational Health and Safety Program.</p>	Agree.	Strategic (Business) plan to be in place by December 2006.
<p>12. That the Occupational Health and Safety Program amend Administrative Policy A03-011(A)(3) "Workplace Risk Assessments" to require a workplace risk assessment to be conducted before the modification or introduction of new work methods, materials, processes or machinery.</p>	Agree.	Will send revisions to Clerks by Spring 2006.
<p>13. That the Occupational Health and Safety Program, in cooperation with Inventory and Disposal Services, amend the Purchasing Policy to include the requirement to consider occupational health and safety in purchasing decisions.</p>	<p><u>Inventory and Disposal Services:</u> Agree.</p> <p><u>Employee Services Branch:</u> Agree.</p>	Purchasing to involve Safety Branch.

Implementation Plan, continued

RECOMMENDATION	MANAGEMENT RESPONSE	IMPLEMENTATION DATE
14. That the benefits of a Disability Assistance program, from both the employer's and employee's perspective, be included in the Disability Assistance Program policy.	Agree.	Complete.
15. That an organization-wide education program be developed to support the implementation of the updated Disability Assistance policy.	Agree.	Complete.

Appendix A Survey Document and Responses

In order to interpret the survey results, please indicate your site and organizational level:

Organizational Level	2	General Manager		
	24	Branch Manager		
	15	Supervisor		
	5	Not indicated		
OHC Committee		Are you a member of an Occupational Health Committee? Please indicate yes or no in the space provided at the left.		
	15	Yes		
	27	No		
	4	Not indicated		
Department	2	Boards and Commissions (e.g., Centennial Auditorium, Credit Union Centre, Mendel Art Gallery & Civic Conservatory)	0	Legislative (e.g., Mayor's Office, City Manager's Office, City Clerk's Office, City Solicitor's Office)
	1	Community Services Department	7	Utility Services Department
	1	Corporate Services Department	0	Public Library
	5	Fire and Protective Services Department	10	Police Services
	19	Infrastructure Services Department	1	Not indicated

Introduction:

The Occupational Health and Safety Act and Regulations specify the responsibilities of employers and employees in ensuring a safe and healthy work environment.

In general terms, the responsibilities of the City of Saskatoon include:

- Ensure the health, safety and welfare of all employees;
- Establish and maintain an occupational health and safety program;
- Consult and co-operate with occupational health committees to resolve concerns on matters of health, safety and welfare; and
- Ensure that employees are not exposed to harassment at work.

In general terms, the responsibilities of employees of the City of Saskatoon include:

- Take reasonable care to protect their own health and safety, and that of other workers;
- Use the safeguards and personal protective equipment provided by the employer;
- Follow safe work practices and procedures;
- Report any potential hazards, unsafe work practices, accidents, incidents and/or "near-misses;" and
- Refrain from causing or participating in the harassment of another worker.

Given these general responsibilities, please indicate the extent to which you agree or disagree with the following statements. The word "**program**" is used in the following statements to refer to the area for which you have responsibility, whether it is a department, branch, business unit, etc.

	Strongly Disagree	Disagree	No Opinion	Agree	Strongly Agree
<u>Leadership:</u>					
Senior management demonstrates an interest in the safety and health of employees.	0	4	1	25	16
Senior management considers the safety of employees of great importance.	0	3	1	27	15
My immediate supervisor shows interest in the safety and health of employees in my program.	0	0	4	26	16
I have the authority to correct unsafe practices or conditions in my program.	0	0	1	26	19
My annual performance plan includes my requirement to help the organization achieve its safety and health goals.	1	7	15	15	8
Safety and health objectives have been developed for my program.	2	5	7	25	7
I clearly understand what my responsibilities are for the health and safety of employees in my program.	0	3	2	29	12
<u>Communication:</u>					
The health and safety rules of the organization have been clearly explained to me.	0	4	4	32	6
There is good communication within the organization about safety issues that affect me and employees in my program.	0	4	5	31	6
I maintain regular contact with employees in my program when they are away due to injury or illness.	1	8	10	26	1
I encourage employees to provide input and suggestions to improve safety and health in my program.	1	0	5	32	8
I encourage employees in my program to identify and report safety hazards.	0	0	2	35	9
I have opportunities to provide input into the health and safety program.	0	1	7	29	9

	Strongly Disagree	Disagree	No Opinion	Agree	Strongly Agree
<u>Employee Participation:</u>					
The proper personal protective equipment is always available for employees in my program.	0	1	3	27	15
I strictly enforce the use of personal protective equipment in my program.	0	2	10	24	10
Health and safety are high priorities when employees in my program are performing their job duties.	0	1	4	30	11
Sometimes employees in my program do not have enough time to follow safety rules and procedures.	11	23	5	6	1
Some safety rules and procedures do not need to be followed to get the job done safely.	13	23	6	4	0
I am often worried about employees in my program being injured on the job.	3	15	9	16	3
<u>Accidents/Incidents/Inspections:</u>					
Employees in my program report <u>every</u> workplace incident, injury or illness they sustain, regardless of severity.	0	4	6	32	4
The procedure for reporting an injury or “near miss” is understood by all employees in my program.	0	7	9	26	4
Health and safety inspections of my program by the Occupational Health and Safety Committee are conducted regularly.	0	8	10	24	4
Health and safety inspections of my program by senior management are conducted regularly.	2	20	11	10	3
I would appreciate health and safety inspections of my program to occur more often.	1	15	18	10	2
The information I receive from Occupational Health and Safety Services regarding accidents/ incidents is useful for helping me ensure the health and safety of employees in my program.	0	2	8	31	5

	Strongly Disagree	Disagree	No Opinion	Agree	Strongly Agree
<u>Disability Management:</u>					
The “return to work” process is timely and responsive.	4	7	13	21	1
The “return to work” program satisfies my expectations.	4	10	14	16	2
The “duty to accommodate” process is timely and responsive.	5	9	12	18	2
The “duty to accommodate” program satisfies my expectations.	5	10	13	16	2
<u>Supervision:</u>					
I often observe the work of employees in my program for the purpose of ensuring their safety and health.	2	7	9	26	2
I conduct periodic safety meetings with the employees in my program.	1	19	10	15	1
I am able to conduct health and safety inspections of my program area regularly.	1	11	9	23	2
I would like to conduct health and safety inspections of my program area more often.	1	10	19	16	0
I feel confident that I know of, and have addressed, all unsafe or hazardous conditions in my program.	1	4	9	30	2
My safety responsibilities are just as important as my other job responsibilities.	0	1	3	32	10
I have the authority to discipline employees in my program in the event that they do not follow safe workplace practices.	2	4	5	27	8

	Strongly Disagree	Disagree	No Opinion	Agree	Strongly Agree
<u>Training:</u>					
I am able to provide worksite-specific orientation and training to new and transferred employees within one week of their arrival.	0	4	16	20	6
All employees in my program are properly trained in health and safety rules and work practices.	1	6	10	26	3
I am able to provide refresher training on a regular basis to employees in my program.	1	5	15	21	4
There are enough training opportunities available to employees in my program regarding health and safety.	1	9	10	25	1
<u>Equipment:</u>					
I am confident that each piece of equipment used by employees in my program is adequately maintained and safe to operate.	0	1	3	34	8
I provide operating procedures, including safety information, to employees in my program for each piece of equipment they operate.	0	3	16	20	7
<u>Overall:</u>					
Occupational Health & Safety Services responds in a timely manner to my requests.	0	0	10	30	6
Occupational Health & Safety Services provides high quality service.	0	0	10	30	6
Occupational Health & Safety Services works effectively to improve safety in the organization.	0	1	9	28	8
Occupational Health & Safety Services works effectively with management to prevent injuries.	0	3	6	30	7
Occupational Health & Safety Services works effectively with management to promote health in the workplace.	0	5	5	30	6