



***Workplace Health, Safety and Wellness –  
Human Resources, Corporate Services***

***May 2020***

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## 1.0 Management Summary

Audit Services has completed an audit of the Workplace Health, Safety and Wellness area, which is under the Human Resources branch of the Corporate Services department. The objectives of the review were to ensure: controls exist and are adequate to support the Occupational Health and Safety Act R.S.O. 1990 (OHSA) requirements and manage the health and safety programs at the Region; compliance with the OHSA requirements and internal policies and procedures; and systems are used effectively and efficiently to support the departments objectives.

The audit scope included interviews with appropriate personnel, a review of the legislative requirements and internal policies/systems, detailed testing of various health and safety compliance requirements for the 2019 fiscal year, and on-site observations of monthly inspections.

Our audit was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing*.

Based on the work Audit Services performed, we concluded that overall the Workplace Health, Safety and Wellness area is being well managed and controls are designed to support the Region's compliance with the OHSA requirements and internal policies. Opportunities for control and process improvements have been noted and discussed in the body of this report. These opportunities include enhanced tracking and management of "incidents" and "hazards" within the Parklane software, additional training for Joint Health and Safety Committee (JHSC) members on compliance requirements for monthly inspections, and increased awareness and oversight on staff compliance with regulatory and mandatory training requirements.

It should also be noted that there were key areas identified during the audit where controls were strong and working effectively as designed. These areas include the Region's 2019 documented Health and Safety policy statement, adherence to the JHSC structure requirements, documented standards exist and are being followed for reporting and tracking incidents, a robust workplace harassment and discrimination program, and continuous improvement initiatives including the "Safe Start" and "Mindful Approach" programs to help ensure the health and safety of all staff.

Should the reader have any questions or require a more detailed understanding of the risk assessment and sampling decisions made during this audit, please contact the Director, Audit Services.

Audit Services would like to thank Workplace Health, Safety and Wellness staff and management for their co-operation and assistance provided during the audit.

## 2.0 Introduction

The Occupational Health and Safety Act (OHSA) is Ontario's legislation for workplace health and safety. Other contributing legislation includes the Workplace Safety and Insurance Act (WSIA), Part II of which deals with the prevention of occupational injury and disease.

York Region's Health, Safety and Wellness area is responsible for managing the safety, health and well-being of every staff and has committed to creating a healthy workplace through the integration of leadership, organizational culture and health and safety practices.

The Human Resources branch is the internal service responsible for the administration of workplace health, safety and wellness programs at the Region. Responsibilities include helping staff that develop an illness or are injured return to work in a safe manner, ensuring the workplace is a safe place and providing education and training on health and safety topics. Human Resources provide advisory services relating to health and safety to all departments within the Region and develop the tools and direction to help ensure compliance with legislation.

The Region has thirty (30) JHSC's in line with the size of our workforce and all locations. The JHSC's consists of management and worker representatives that have specific responsibilities and together they are responsible for providing leadership in improving health and safety conditions in the workplace by adhering to the OHSA and its regulations as well as internal policies.

The Minister of Labour governs health and safety and is responsible for enforcing the OHSA in Ontario. Inspectors are the enforcement arm of the Ministry of Labour and their role includes the following: inspection of workplaces, issuing orders where non-compliance is found and investigations of accidents and work refusals.

## **3.0 Objectives and Scope**

### **AUDIT OBJECTIVES**

The objectives of this engagement are:

- To provide assurance on the adequacy and effectiveness of controls in place to support the Occupational Health and Safety Act (OHSA) requirements and manage workplace health and safety programs at the Region.
- To evaluate compliance with relevant legislation (OHSA), regulations and internal policies and procedures.
- To ensure systems/software that support the Health and Safety program are designed to provide adequate oversight and reporting on metrics.

### **AUDIT SCOPE**

The audit objectives were accomplished through:

1. Interviews with appropriate personnel involved in workplace health, safety and wellness programs.
2. A review of legislation and internal policies and procedures that support workplace health, safety and wellness programs.
3. A review of health and safety documentation produced, collected and distributed.
4. A review of program objectives and industry best practices.

5. Detailed testing and on-site observation of various health, safety and wellness programs for compliance with legislation and internal policies and procedures, for the period November 1, 2018 to December 31, 2019.

## **4.0 Detailed Observations**

### **4.1 Incident Tracking**

#### **Observation**

Corrective action completion date for incidents is not currently entered into the Parklane software. The Parklane software is where all health and safety incidents are entered for tracking and reporting. An incident is defined as “an occurrence, condition, or situation arising in the course of work that resulted in or could have resulted in injuries, illnesses, and damage to health, or fatalities.”

Based on discussions with the Lead, Health and Safety and a review of the Parklane system, the completion date for corrective actions taken to resolve and/or prevent future issues is not actually recorded in the Parklane software once all required action has been taken. The health and safety group is involved with reviewing the incidents and they take trends to the JHSC meetings; however, there is no clear way to report on the timeliness and completeness of addressing the incident or to analyze long term trends. Tracking when an incident has been fully addressed may help reduce the risk of the incident not being resolved sufficiently to prevent similar injuries from occurring.

#### **Recommendation**

Management should update the process for incident reporting and tracking to ensure the completion date of corrective actions is entered into the Parklane software.

#### **Management Response**

HR Health & Safety will explore methods to enter actions, responsibility, plan date and completion date of incident corrective actions.

York Region’s Employee Incident/Injury process document will be updated to indicate new corrective action tasks and management will be trained on new responsibilities.

Completion Date: Q3 2021

### **4.2 Detailed Testing – Inspections & Committee Meetings**

#### **Observation**

The OHSA requires the JHSC’s to meet at least once every three months and that all workplaces are inspected by the committee members at least once a month.

Audit selected a random sample of ten (10) Regional locations and reviewed the quarterly JHSC meeting minutes and monthly inspection reports for the period November 2018 to December 2019. The following observations were noted during the review:

- Two (2) out of the ten (10) (20 percent) sample locations selected were missing evidence of the quarterly JHSC meetings and three (3) out of the ten (10) (30 percent) sample locations were missing evidence of the on-site monthly health and safety inspection reports. Missing or incomplete OSHA requirements may increase the risk of non-compliance orders and/or pose a risk to employee safety.
- Digital copies of JHSC inspections and meeting minutes are not consistently maintained in a centralized location. Based on discussions with health and safety committee members and the Health and Safety Specialists, hard copies of the inspection reports are posted on-site and digital copies emailed to the manager and specialist only if there are concerns noted. Without a centralized location to house the regulatory compliance results, there may be a risk of incomplete or missing items that may go undetected.
- Hazards identified during monthly inspections are not formally tracked and monitored for resolution. The inspection reports are emailed to the manager of the area and the Health and Safety Specialist; however, there is no formal follow up process for hazards identified. Based on discussions with staff during the onsite visits, there have been instances where issues have been reported multiple times with no resolution. Without a formal follow up process, there may be a risk that an issue may be unresolved.
- Multiple versions of the inspection checklist template are in use and do not include a checkoff column for the inspector to mark as complete for each area. Implementing a standard checklist with a check mark requirement for each area may help ensure consistency and completeness of inspections.

### **Recommendation**

1. Management should consider centralizing the records management for monthly inspection reports/results and committee meeting minutes to ensure completeness. Consideration should be given to formally tracking hazards identified during the monthly inspections to allow for an increase in oversight in addressing concerns.
2. Management should review the various inspection template checklists in use and ensure the most current is communicated to all appropriate members. In addition, the template could be updated to include a column for the inspector to initial each item reviewed to ensure completeness. Once updated, the current checklist should be distributed to all locations performing inspections.

### **Management Response**

A database will be implemented by the HR Health & Safety team for centralizing the records management for JHSC committee meeting minutes and monthly inspection reports/results.

The current JHSC inspection checklist available on the JHSC Portal page will be reviewed and updated. Once updated, the current checklist will be distributed to all locations performing inspections. The HR Health & Specialists will support customization of the inspections checklist

for relevant groups where sector specific hazards apply. A column will be added on the checklist for the inspector to verify that items noted on the previous inspection have been addressed.

Completion date: Q3 2021

### **4.3 On-site Observation – Inspections**

#### **Observation**

Monthly health and safety inspections were not in full compliance with the OHSA requirements. Audit Services selected a random sample of five (5) locations to attend and observe the monthly health and safety inspection.

*Please note, due to the timing of the scheduled inspections and the start of the Covid-19 public health crisis, Audit Staff were only able to attend two (2) out of the five (5) on-site inspections.*

The following concerns were observed during the on-site inspections;

- The fire extinguishers and first aid kits were not inspected at both locations as required under the OHSA.
- The external inspection of the building was not completed at one of the locations as required under the OHSA.

Non-compliance with the OHSA regulatory requirements for monthly inspections may result in orders issued and/or pose a risk to employee safety.

#### **Recommendation**

Management should implement the following:

- Education and communication with JHSC members to ensure they are aware of the OHSA requirements and compliance areas covered within their inspections.
- Increased oversight by Health and Safety Specialists to ensure committee members are meeting the OHSA requirements for inspections.

#### **Management Response**

HR Health & Safety will create a self-learning JHSC workplace inspection training resource and will engage the Corporate Health and Safety Advisory Committee (CHASAC) to assist in educating JHSC members who complete workplace inspections.

The HR Health & Safety Specialists will attend two (2) JHSC inspections for each JHSC in 2021 in order to provide oversight of OHSA requirements for inspections. To become familiar with the workplace inspection process, area management will also be invited to attend when the H&S Specialist is present.

Completion Date: Q4 2021



## 4.4 Training

### Observation

Training requirements are not always being met in accordance with legislation and Regional requirements. York Region staff are required to complete specific Regional required mandatory training and OHSA regulatory training. Exception reporting is produced annually within the Learning Management System and is communicated to Directors.

Audit Staff reviewed regulatory and mandatory training compliance for a random sample of thirty (30) staff across the Region for the 2019 year and noted the following observations in Table 1 below:

Table 1

<b>Training</b>	<b>Type</b>	<b>Not Completed</b>	<b>% Not Completed</b>
WHMIS Full Course	Regulatory	9	30%
Health & Safety Awareness	Regulatory	9	30%
WHMIS Annual Refresher	Mandatory	12	40%

Non-compliance with training requirements may result in fines and/or a risk to employee safety.

In addition to the sample selected, the Region wide “Required and Mandatory Learning Report for 2019” prepared by Human Resources was reviewed and noted that the 2019 annual WHMIS refresher course had the lowest percentage completion rate of all mandatory training at 71 percent. Non-compliance with mandatory health and safety training may pose a risk to employee safety.

### Recommendation

1. Management should reaffirm with staff their responsibility for completing training, monitoring compliance and follow up as necessary.
2. Management should consider distributing exception reporting more frequently and directly to staff and supervisors before escalating to the Director level annually.
3. Management should consider implementing a threshold for the length of time to complete overdue training requirements and advise individuals to complete training before escalation to the Executive Director of Human Resources.

### Management Response

HR Health & Safety will engage Business Services, Communications to develop a communication plan to reaffirm with staff their responsibility regarding mandatory Health and Safety training course completion. The communications will highlight the ability to complete courses online.

HR Health & Safety will liaise with departmental Learning and Development teams to ensure that training exception reports are distributed to supervisors and staff at least bi-annually.

HR Health & Safety will seek Senior Management endorsement to indicate specific required completion timelines for all regulatory health and safety courses currently outlined in the 'required courses' information on the Portal. Overdue thresholds will be included the training exception reports sent to supervisors.

Completion Date: Q4 2021

## **4.5 Health & Safety Information - Intranet**

### **Observation:**

Audit Staff reviewed the health, safety and wellness information found on the Region's intranet site that is used to keep employees informed under the Human Resources area and noted the following observations:

- The "Employee Health Resources" portal page can be laid out in a more organized manner. The format of documents appears inconsistent and the information provided in the linked documents does not always provide clear or complete directions. Improving the organization of information contained on the portal page may help improve employee awareness and compliance with health and safety policies/procedures.
- The policies that appear under the "Employee Health Related Policies" section are outdated. As such, there is a risk that information contained in one or more of those policies is not consistent with the OHSA, which was last updated in December 2017.
- The extent of health and safety information and resources provided varies across the Region's employee portal. There is a greater level of health and safety related information found within other areas on the Region's intranet site compared to that found within the Human Resources Health, Safety & Wellness page. Examples of these other areas include the Health & Wellness tab under the Paramedic Services Resources section and the Safety tab under the "My Life & Career" drop down menu on the home site. Decentralized information may lead to inconsistent messaging, duplication of information, and be difficult for staff to navigate.

### **Recommendation:**

1. Management should review the "Employee Health Resources" portal page and update to ensure information is presented in an organized and consistent manner. Policies should be reviewed and updated accordingly to ensure they are clear, accurate, complete and current.
2. Management should determine the frequency with which policies should be reviewed and updated going forward to ensure current regulations and compliance requirements are accurately reflected in a timely manner.

3. Management should review the current landscape for health and safety information available on the portal and ensure health and safety information is presented in a clear, consistent and coordinated manner. Consideration should be given to link the information under the “My Life & Career” safety section to the Human Resources Health Safety & Wellness portal page.

**Management Response:**

The My Life and Career and the associated tabs is where all workplace safety information is to be housed. The Corporate Services – Human Resources – Health and Safety will be updated. Duplicate information by other departments will be flagged and removed or redirected to the tabs on My Life and Career page.

Management will review Health and Safety policies annually and will update information as necessary to ensure current regulations and compliance requirements are accurately reflected.

Completion Date: Q2 2021

*Original signed by*

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