





## FOREWORD

The Workers' Safety and Compensation Commission (WSCC) produced this industry *Code of Practice* in accordance with subsections 18(3) and 18(4) of the Northwest Territories and Nunavut *Safety Acts*.

This *Code of Practice* applies to all workplaces covered by the Northwest Territories and Nunavut *Safety Acts* and *Occupational Health and Safety (OHS) Regulations*.

The *Occupational Health and Safety Programs Code of Practice* relates to Sections 4, 5 and 7 of the Northwest Territories and Nunavut *Safety Acts*, and in the Northwest Territories and Nunavut *Occupational Health and Safety Regulations* relates to Part 3 *GENERAL DUTIES*: Sections 16, and 21.

This code is in effect as published in the *Northwest Territories Gazette* and *Nunavut Gazette*, in accordance with the *Safety Acts* and *Occupational Health and Safety (OHS) Regulations*.

### IN EFFECT DATES:

**Northwest Territories:** 31 May 2017

**Nunavut:** 31 May 2017



Chief Safety Officer, WSCC

### Disclaimer

This publication refers to obligations under the workers' compensation and occupational health and safety legislation as administered by the Workers' Safety and Compensation Commission.

To ensure compliance with legal obligations always refer to the most recent legislation. This publication may refer to legislation that has been amended or repealed.

Check for information on the latest legislation at [wsc.nt.ca](http://wsc.nt.ca) or [wsc.nu.ca](http://wsc.nu.ca), or contact WSCC at 1-800-661-0792.

## TABLE OF CONTENTS

1	WHAT IS A CODE OF PRACTICE? .....	6
2	DEFINITIONS.....	7
3	INTRODUCTION.....	9
4	ACTS, REGULATIONS, AND STANDARDS .....	10
5	WHAT IS AN OCCUPATIONAL HEALTH AND SAFETY PROGRAM?.....	12
	5.1 INJURY REDUCTION.....	12
	5.2 SAFETY CULTURE IMPROVEMENT.....	13
	5.3 DECREASED COSTS .....	13
6	COMMITMENT .....	14
	6.1 HEALTH AND SAFETY POLICY .....	14
	6.2 EXPECTATIONS .....	15
7	RESPONSIBILITIES.....	16
	7.1 MANAGERS.....	16
	7.2 SUPERVISORS .....	16
	7.3 WORKERS .....	17
8	HAZARDS.....	18
	8.1 HAZARD IDENTIFICATION.....	18
	8.2 HAZARD ASSESSMENT.....	18
	8.3 HAZARD CONTROL .....	18
9	INSPECTIONS.....	19
	9.1 FORMAL INSPECTIONS .....	19
	9.2 INFORMAL INSPECTIONS.....	20
10	PROGRAMS .....	21
	10.1 MANAGEMENT OF HAZARDOUS MATERIALS.....	21
	10.2 PREVENTATIVE MAINTENANCE .....	23
11	TRAINING .....	25
	11.1 PRE-HIRE SCREENING.....	25
	11.2 FORMAL ORIENTATION.....	26
	11.3 ON-THE-JOB TRAINING .....	27
	11.4 SUPERVISION.....	28
	11.5 MEETING COMPETENCY REQUIREMENTS .....	29

- 12 EMERGENCY RESPONSE PLAN ..... 30
  - 12.1 DRILLS..... 31
- 13 INCIDENTS AND INVESTIGATIONS ..... 33
  - 13.1 INCIDENTS ..... 33
  - 13.2 INVESTIGATIONS ..... 34
    - 13.2.1 INVESTIGATION PREP ..... 34
    - 13.2.2 INVESTIGATION ROLES ..... 35
    - 13.2.3 ROOT CAUSE..... 36
  - 13.3 STATISTICS..... 38
- APPENDIX A – INCIDENT INVESTIGATION REPORT ..... 40
- APPENDIX B – SAMPLE OHS PROGRAM TABLE OF CONTENTS..... 46

# 1 WHAT IS A CODE OF PRACTICE?

WSCC codes of practice provide practical guidance to achieve the safety requirements of the Northwest Territories and Nunavut *Safety Acts* and related *Regulations*.

As per subsection 18(3) of the Northwest Territories and Nunavut *Safety Acts*, “For the purpose of providing practical guidance with respect to the requirements of any provision of this *Act* or the *Regulations*, the Chief Safety Officer may approve and issue such codes of practice as he or she considers are suitable for that purpose.”

WSCC codes of practice apply to workplaces in the Northwest Territories and Nunavut. The Chief Safety Officer approves codes of practice for use by all occupational health and safety (OHS) stakeholders. Codes of practice come into effect in each territory on the day they are published in the *Northwest Territories Gazette* and *Nunavut Gazette*.

Codes of practice do not have the same legal force as the *Safety Acts* and related *Regulations*. A person or employer cannot face prosecution for failing to comply with a code of practice. However, in legal proceedings under the *Safety Acts* and related *Regulations*, failure to observe a code of practice may be a consideration when determining whether a worker or employer complies with the *Safety Acts* and related *Regulations*.

Employers and workers should follow WSCC codes of practice unless there is an alternative course of action that achieves the same or better occupational health and safety outcomes.

## **A Code of Practice**

- Provides practical guidelines.
- Adapts to individual work sites.
- May serve as evidence.
- Should be followed unless there's a better way.

## 2 DEFINITIONS

**Audit:** Using an approved standard for comparison against a completed evaluation of an organization's Occupational Health and Safety Program.

**Competent:** In respect of a function, task or duty, possessing the knowledge, experience and training to perform the function, task or duty;

**Contractor:** A person or company contracted to supply products or services.

**Dangerous Occurrence:** Means an occurrence that does not result in, but could have resulted in an accident causing serious bodily injury. Incidents with a high potential to cause death or serious injury, and must be reported to the WSCC.

**Employer:** Every partnership, group of persons, corporation, owner, agent, principal contractor, subcontractor, manager, or other authorized person having charge of an establishment in which one or more workers are engaged in work.

**Hazard:** Any situation, thing, or condition that may expose a person to risk of injury or occupational disease.

**Health Hazard:** Results in acute or chronic injury/disease or causes damage as a result of exposure to physical, chemical, biological, or psychological hazards (e.g. noise, dust, heat, ergonomics, etc.)

**Safety Hazard:** Any hazard that can cause an injury or disease to the worker in the position or to another worker in another position.

**Hazard Assessment:** The process to identify, assess, and eliminate or manage workplace hazards and risks to worker health and safety.

**Hazard Control:** All the steps necessary to protect workers from exposure to a substance or system. Including the procedures required to monitor worker exposure to hazards such as chemicals, materials, substances, or other hazards such as noise and vibration. A written workplace hazard control program should outline which methods are in use to control exposures and the means for monitoring the effectiveness of the controls.

**Hazard Identification:** Formal identification and documentation of hazards.

**Incident:** An occurrence arising in the course of work that could result in an injury or illness. Also known as an accident.

**Inspection:** Regular review of buildings, equipment, workers, the work environment, processes, and practices to prevent hazards.

**Manager:** A person responsible for assigning and monitoring job duties.

**Near Miss:** An incident in which there was no injury or damage but has the potential to cause injury or damage.

**Personal Protective Equipment (PPE):** Any clothing, device, or other article that a worker wears to create a protective barrier between themselves and hazards in the workplace or to facilitate a rescue.

**Procedure:** A documented method to carry out an activity.

**Records:** A document that states achieved results, or provides evidence of activities performed.

**Risk:** The chance or probability of a person getting harmed, or experiencing an adverse health effect if exposed to a hazard.

**Root Cause:** The reason or factors which ultimately lead to an incident.

**Safe Job Procedures:** A written set of procedures or processes which outlines the specific steps required to complete a high risk task safely from start to finish.

**Safe Work Practices:** A written set of practices which outline the specific steps required to complete a low or medium risk task safely from start to finish.

**Supervisor:** An individual who is authorized by an employer to oversee or direct workers.

**Unsafe Act:** An action that deviates from the recognized safe way of doing a job.

**Unsafe Condition:** An unsatisfactory condition existing in a workplace environment.

**Work Site:** A physical location where a worker is, or is likely to be, engaged in work.

**Worker:** A person engaged in work for an employer, whether working with or without remuneration.

**Workers' Safety and Compensation Commission (WSCC):** the agency of the Governments of the Northwest Territories and Nunavut that provides insurance to employers for workers who sustain workplace related injuries. If workplace incidents occur it is the responsibility of the employer to ensure it is reported to the WSCC.

### 3 INTRODUCTION

#### **CODE OF PRACTICE ON OCCUPATIONAL HEALTH AND SAFETY PROGRAMS**

This *Code of Practice* is the first stepping stone on the path to implementing an Occupational Health and Safety Program (OHS Program) within an organization, and can assist in guiding management through the development process. OHS Programs are required for employers with 20 or more workers.

When developing an OHS Program, remember to use a valuable and readily available resource: workers. Involving them in the various levels of development and the final product is important for 'buy-in' purposes along with the overall success and effectiveness of the program.

Workers have relevant experience that can help design a well-structured and efficient OHS Program. Workers know how a safety system can best fit within the organization and also what impact the current safety culture will have on certain aspects of the program. When the program is complete, allow plenty of opportunities for worker feedback. It is important to ensure workers are aware that they maintain a voice in what they helped create. All these pieces will help maintain worker commitment after the OHS Program is in place.

## 4 ACTS, REGULATIONS, AND STANDARDS

### Northwest Territories and Nunavut *Safety Acts*

#### HEALTH AND SAFETY

4. (1) Every employer shall
- (a) maintain his or her establishment in such a manner that the health and safety of persons in the establishment are not likely to be endangered;
  - (b) take all reasonable precautions and adopt and carry out all reasonable techniques and procedures to ensure the health and safety of every person in his or her establishment; and
  - (c) provide the first aid service requirements set out in the regulations pertaining to his or her class of establishment.
- (2) If two or more employers have charge of an establishment, the principal contractor or, if there is no principal contractor, the owner of the establishment, shall coordinate the activities of the employers in the establishment to ensure the health and safety of persons in the establishment.
5. Every worker employed on or in connection with an establishment shall, in the course of his or her employment,
- (a) take all reasonable precautions to ensure his or her own safety and the safety of other persons in the establishment; and
  - (b) as the circumstances require, use devices and articles of clothing or equipment that are intended for his or her protection and provided to the worker by his or her employer, or required pursuant to the regulations to be used or worn by the worker.
7. Every employer shall implement and maintain an occupational health and safety program for a work site as required by the regulations.

### *Occupational Health and Safety Regulations*

#### Northwest Territories and Nunavut

#### PART 3

#### GENERAL DUTIES

16. (1) An employer shall ensure that, at a work site,
- (b) supervisors have sufficient knowledge of the following:
    - (i) any occupational health and safety program applicable to workers supervised at the work site,
21. (1) An employer shall provide an occupational health and safety program under this section if
- (a) there are 20 or more workers who work at the work site; or
  - (b) the employer is so directed by the Chief Safety Officer.
- (2) An occupational health and safety program for a work site must include
- (a) a statement of the employer's policy with respect to the protection and maintenance of the health and safety of workers;

- (b) an identification of hazards that could endanger workers at the work site, through a hazard recognition program;
  - (c) measures, including procedures to respond to an emergency, that will be taken to reduce, eliminate and control the hazards identified under paragraph (b);
  - (d) an identification of internal and external resources, including personnel and equipment, that could be required to respond to an emergency;
  - (e) a statement of the responsibilities of the employer, the supervisors and the workers;
  - (f) a schedule for the regular inspection of the work site and inspection of work processes and procedures;
  - (g) a plan for the control of hazardous substances handled, used, stored, produced or disposed of at the work site and, if appropriate, the monitoring of the work environment;
  - (h) a plan for training workers and supervisors in safe work practices and procedures, including procedures, plans, policies or programs that the employer is required to develop;
  - (i) a procedure for the investigation of refusals to work under section 13 of the *Act*;
  - (j) a strategy for worker participation in occupational health and safety activities, including audit inspections and investigations of refusals to work under section 13 of the *Act*; and
  - (k) a procedure to review and, if necessary, revise the occupational health and safety program not less than once every three years or whenever there is a change of circumstances that could affect the health or safety of workers.
- (3) An occupational health and safety program must be implemented and updated in consultation with
- (a) the Committee or representative; and
  - (b) the workers.
- (4) An occupational health and safety program required under this section must be in writing and made available to the workers.

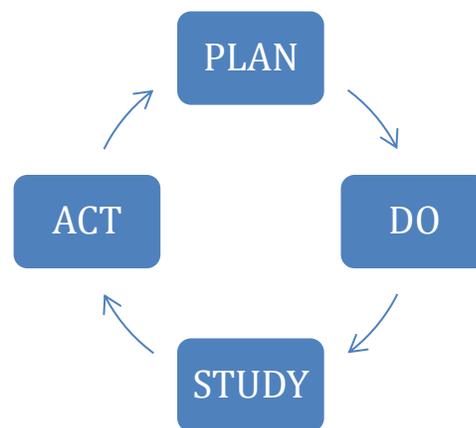
## 5 WHAT IS AN OCCUPATIONAL HEALTH AND SAFETY PROGRAM?

An OHS Program incorporates policies and procedures which are developed to decrease the occurrence of workplace disease and illness. The complexity of an OHS Program is dependent on the work environment; specifically its size, number of locations, and the type(s) of work conducted. Success of an OHS Program requires engagement and commitment from the management team and workers combined with regular review and continuous improvement of the program.

The Plan, Do, Study, Act (PDSA) Cycle<sup>1</sup> can be used to move through the process of continual OHS Program improvement. The cycle has 4 stages:

- **Plan:** the employer selects a goal (e.g. reduced workplace injuries) and they develop an OHS Program to achieve the goal.
- **Do:** the OHS Program is implemented.
- **Study:** the employer will review statistics gathered and determine areas of improvement.
- **Act:** the employer takes what they have learned and makes adjustments to reach the goal.

The cycle continually repeats as the employer improves the OHS Program over time. There are three main benefits to implementing and maintaining an OHS Program within the organization: injury reduction, safety culture improvement, and decreased costs.



### 5.1 INJURY REDUCTION

From formal assessments to preventative maintenance and informal inspections, an OHS Program provides multiple opportunities for management, supervisors, and workers to discover and address hazards. This lessens the chance that those hazards will develop into an incident resulting in injury, illness, or death. A more traditional view of hazard assessments is where a one-time review is considered adequate. Since people, locations and environments are variable; this old model of addressing hazards is not good enough. A multiple-level program is much more efficient at reducing injuries; it is based on the understanding that hazards never stop presenting themselves, people just stop looking for them.

<sup>1</sup> The W. Edwards Deming Institute: PDSA Cycle: Retrieved 8 March 2017 from <https://www.deming.org/theman/theories/pdsacycle>.

## 5.2 SAFETY CULTURE IMPROVEMENT

When a new worker goes through an orientation, they learn all about the importance and value their new employer places on safety in the workplace. However on their first day in the shop they are told by their supervisor that it is not a big deal that the safety guard on the hand grinder is missing. This is a common scenario: where a supervisor sends a clear message that what the worker learned in orientation is not actually important in their workplace. The message received is that management does not care about safety. This may not be true, but who is the worker going to listen to, the Human Resources staff member who did their orientation or their supervisor? The most likely answer is their supervisor, and since the worker is new to the job and would rather not make waves, they are probably going to use the hand grinder even though they know it is not safe. This is an example of a safety culture needing improvement.

The way to improve safety culture is to have all levels of management leading by example. It is not enough to just put a promise on paper. Workers need to see management taking part in safety committees, prioritizing safe work over deadlines and seeing the CEO doing a pre-trip walk around before getting in their car. Worker buy-in is possible, but it will not happen without management buying in first.

If the supervisor in the example above tagged out the hand grinder and issued the worker a new one, those actions would have sent a very different message about the safety culture in the shop.

## 5.3 DECREASED COSTS

When an incident occurs and a worker is injured, there are many costs associated with it, not just medical or compensation costs. There are additional uninsured costs that employers are responsible for in order to keep the operation running. This may include repairing or replacing damaged equipment, buildings, or products. Worker time is not cheap. When an incident occurs there is the added cost of the investigation team, time-loss wages, and overtime. In a more serious incident where the worker will be away from work for an extended period there are costs associated with temporarily filling the injured workers position including: advertising for the position, interviewing, hiring, and training coverage until the injured worker can return to their duties. Do not forget the decreased production output which follows when a crew is down a member or two, which ultimately impacts the bottom line. Finally, an employer that does not keep its worker's safe can end up with a poor public image and decreased public support, which impacts sales.



## 6 COMMITMENT

In order for an OHS Program to be successful, commitment from the employer and its representatives (owner, management, supervisors, and team leaders) as well as workers is required. Commitment to the program needs to be in multiple forms: commitment to health and safety; commitment to developing the program; and commitment to making and maintaining the program a priority. A written policy outlining these commitments needs to be displayed prominently so all employees are aware and reminded of what the organization's health and safety priorities are.

Multiple levels within the company will have roles and responsibilities in developing policies which will define the organization's OHS Program. When it comes to writing the policy, employees in health and safety positions who are experienced with OHS Programs and members of the Joint Occupational Health and Safety Committee (JOHSC)/Safety Representative should be involved. For more information on JOHSC/Safety Representative, review the code of practice [here](#).

### 6.1 HEALTH AND SAFETY POLICY

The purpose of a health and safety policy is to communicate throughout the organization that the health and safety of all workers is a priority. The policy lays out the terms for the whole OHS Program and needs to be clear and concise to prevent misinterpretation. Some topics to include in the policy are:

- A statement from management outlining its commitment to the OHS Program. The policy should bear the signatures of the most senior person of the company. It must be reviewed and re-signed every year to remind management and all workers of the commitment.
- An outline of the responsibilities shared by everyone in the workplace in order to keep the workplace safe. Example responsibilities are: Managers must ensure that resources are available for supervisors and workers to get the task done safely. Supervisors must ensure workers have adequate training and are compliant with the OHS Program and legislation. Workers are responsible for reporting any hazards and for refusing any unsafe work.
- State the goals of the organization. Which could be to send everyone home safely to their families each day, or to be an incident-free organization.
- List the legislation, *Safety Acts* and *Regulations* that apply to the industry and what additional legislation may apply for the specific organization. For example: *Transportation of Dangerous Goods Regulations* for a transport company.

While the company must review the policy annually the policy should be continuously communicated to workers throughout the year. This can be done by posting a copy in locations frequented by workers. If the company has an intranet site or website, an electronic copy should be made available online. Most importantly, the policy should be openly discussed during safety meetings, or company-wide tailgates so all workers and management are reminded of their duties. The policy will have little effect if it is posted and then never discussed again except at the annual re-signing.

## 6.2 EXPECTATIONS

Everyone within the organization from the owner to the newest employee or visitor needs to be aware of the health and safety expectations within the workplace. These responsibilities must be defined and clearly communicated from the onset of the program to ensure everyone is upholding the same standard of health and safety.

Measureable and attainable Key Performance Indicators (KPI) must be implemented throughout the program. An example would be setting an inspection report deadline where all inspection reports must be closed off within one week. Another inspection example would be that a manager must perform at least one inspection a week. The KPI must be captured on the annual assessment.

Establishing responsibilities and inserting them into contracts, job descriptions, and operating procedures will help to make health and safety in the workplace a common goal. This also serves to outline each individual's personal responsibility to ensure the OHS Program's success. For example: an organization has hazard ID cards where a worker identifies a problem and submits the completed card to their supervisor. The make or break in this system is whether management acts on the card; if they do not prioritize following up on the submitted cards as expected, the workers will stop filling them in.

Just as the roles need defining, so do consequences for individuals failing to meet the legislated or organizational safety standard. Consequences need to be applied fairly and consistently. They should be discussed ahead of time in performance reviews and safety meetings to ensure all levels of the organization understand the importance of meeting the safety standard.

## 7 RESPONSIBILITIES

Safety meetings, new employee training, performance or competency reviews and inspections are all opportunities to offer specific or general feedback on whether responsibilities are being met. Some examples of responsibilities are listed below:

### 7.1 MANAGEMENT:

- Define the health and safety policy for the company;
- Set and maintain the health and safety performance standard, against which all behaviours and performance reviews are compared;
- Actively encourage the involvement of all employees in health and safety, and visibly lead by example;
- Put health and safety as a priority in contracts and bids by ensuring contractors are registered with the WSCC and meet company safety standards (sometimes the lowest price initially is not the best choice);
- Provide resources and supervision for workers to safely complete their tasks;
- Define the circumstances under which an investigation will take place, and ensure those incidents are investigated in a timely manner;
- Ensure investigations focus on finding the root cause(s), instead of assigning blame to an individual;
- Assign corrective actions and insist on timely implementation;
- Establish proper hazard controls including Engineered, Administrative and PPE, safety equipment needs, and provide supplies to meet all needs; and
- Ensure all employees are competent and qualified to complete their tasks in a safe manner.

### 7.2 SUPERVISORS:

- Set and maintain the standard for worker performance and communicate expectations for safe and efficient work;
- Visibly lead by example, commit and promote health and safety as a priority;
- Evaluate training needs and assign competent workers to the tasks;
- Ensure workers are aware of hazards and controls and how to follow safe operating procedures if the hazard cannot be eliminated;
- Ensure appropriate PPE and equipment;
- Train workers on how to report hazards;
- Conduct or partake in investigations of all incidents internally, including near misses;
- Follow-up on recommendations and findings from investigations; apply corrective actions in a timely manner; and
- Report, and ensure appropriate paperwork is submitted to the WSCC.

### **7.3 WORKERS:**

- Perform responsibilities under the OHS Program;
- Constructively partake in the health and safety at the workplace;
- Follow the employer's safe work procedures/practices, rules, and the governing *Safety Acts and Regulations*;
- Identify hazards at the workplace and implement appropriate controls;
- Inspect, and wear approved PPE;
- Actively participate in training;
- Refuse unsafe work; and
- Report hazards, incidents and near misses immediately to a supervisor.

## 8 HAZARDS

In accordance with the *Safety Acts* and the *Occupational Health and Safety (OHS) Regulations* in the Northwest Territories and Nunavut, an employer is responsible for providing a safe workplace and maintaining a safe environment to prevent injury or disease. Hazard assessments and proper controls place an employer one step closer to meeting that requirement.

### 8.1 HAZARD IDENTIFICATION

Hazard identification is the process of determining, what hazards are in the workplace before an incident occurs. Hazards can be classified as either health or safety hazards, and further categorized as physical, chemical, biological, or psychosocial. Each workplace environment is unique and the type of hazards present will vary within the organization. Once hazards are identified, assessing what the likelihood is that the hazard may occur, the severity of the situation that would arise if the hazard were to occur, and the frequency of exposure will determine the next steps. These factors combine to create a priority rating and will assist in highlighting which hazards need to be addressed immediately and which can be addressed in the near future.

### 8.2 HAZARD ASSESSMENT

There are two types of hazard assessments, which are discussed in detail in the WSCC Code of Practice on Hazard Assessment found [here](#). The first is formal hazard assessments, which includes all the activities of all the positions within the organization. This type of hazard assessment takes time to complete, but the result is a comprehensive document which can be updated as positions change within the organization. The second type, a site-specific hazard assessment, targets a certain worksite in that moment in time. It is quick, effective and the results can be used to update the formal hazard assessment for the entire organization.

### 8.3 HAZARD CONTROL

Controls are measures taken to reduce the risks of hazards within the workplace. Since the priority has now been established, controls can be implemented to prevent hazards from having an impact on workers. There are five basic ways to control hazards, and these methods form a hierarchy:

- 1.) **Elimination** of the hazard; to remove it from the workplace entirely.
- 2.) **Substitution** with a less hazardous alternative.
- 3.) **Engineering** through equipment, workplace or process design to keep the hazard away from workers.
- 4.) **Administrative** controls limit the exposure of workers to the hazard through reduction, rotation, training, maintenance and inspections.
- 5.) **Personal Protective Equipment (PPE)** is the last level in the hierarchy and is only used when the other controls are not effective. PPE is equipment that the worker wears to protect them from the hazard.

## 9 INSPECTIONS

Inspections are commonly confused with investigations (section 13), but they are not the same. An inspection is a proactive tool used to protect workers and identify hazards which may impact equipment, the environment and productivity.

There are two types of inspections detailed below: formal and informal. Both serve to:

- Determine if there are any unsafe acts or conditions;
- Identify and positively reinforce compliance, safe acts, and conditions;
- Be an avenue for taking corrective actions; and
- Stop an incident before it happens.

Inspections have standards for which all findings are compared to. A company policy outlining standards should be drafted so all inspections are completed efficiently and fairly.

There are three levels within the organization that should complete inspections:

- Management:
  - Managers inspect the overall environment. How are the workers behaving? Are supervisors and workers compliant and enforcing safety standards? How are the worksite conditions?
- Supervisor:
  - Supervisors also inspect the behaviour of the workers and the worksite conditions. They must also inspect equipment, PPE, procedures and monitor whether or not workers are compliant.
- Worker:
  - Workers inspect their immediate work stations and any areas they may come in contact with during their tasks. They must check their own equipment, tools, PPE, and procedures. Workers may be expected to provide feedback on safety-related behaviours.

### 9.1 FORMAL INSPECTIONS

Formal inspections are a standard part of the job. They occur on a regular schedule, follow a checklist, and are performed by a specific person (or position). Formal inspections for equipment take place prior to use and at a specified number of running hours, kms, etc. This is a good opportunity to take an employee from a different department into the warehouse (and vice versa) as an additional set of eyes on the inspection. Individuals who do not see the environment every day can raise valuable questions which challenge the “because that is how we always do it” way of thinking.

The inspection report is not a living document, and does not require updating, but must be kept on file and may be referenced during other inspections. The purpose of the document is to review the subject of the inspection (equipment, tools, procedure, location, etc.) and determine if it meets the standards set out in the checklist. The checklist should be very specific so the person completing the inspection knows exactly what to look for. In addition to what was uncovered and how it was or will be fixed, the inspection report should also assign responsibility for corrective actions, a completion date, a follow-up date, and a require management signoff.

## **9.2 INFORMAL INSPECTIONS**

Informal inspections do not follow a set schedule, providing organizations with the opportunity to witness workers operating safely or unexpectedly uncover a hazard. There is no checklist, as these inspections are not designed to look at specific items but instead keep the work area safe and efficient. With minimal training, anyone can conduct informal inspections effectively. Workers must be reminded that they are expected to conduct informal inspections; this can be accomplished by including the duty in their job description and discussing the requirement during safety meetings.

## 10 PROGRAMS

There are multiple types of programs an organization can put in place to further improve the OHS Program and the safety of their workers. Some are required by legislation, while others may simply support the company's standards. Two important programs to have are a hazardous material program and a preventative maintenance program. These programs in particular should not be considered separate from the other hazard management requirements of the OHS Program. They both feed into the system of reporting and controlling hazards even though there may be differences in the process, documentation, and possibly terminology. There is a large variety of programs to include depending on the work being completed. Additional program examples are: Fall Protection, Lockout/Tag Out, Working Alone, Safe Lifting and Confined Space.

### 10.1 MANAGEMENT OF HAZARDOUS MATERIALS

Health Canada legislation makes the hazardous materials program easier to implement than some of the other programs as the requirements are already laid out for employers. WHMIS 2015 is a program that defines clear controls and labelling for controlled products.

Part of the hazardous materials program is educating and training workers. Workers need to know how to safely handle the controlled products they will encounter in their workplace. This is done through WHMIS training and Safety Data Sheets (SDSs) or Material Safety Data Sheets (MSDSs) if the organization is still following WHMIS 1988. An employer is required to post SDSs/MSDSs for controlled products in an easy to access location. Workers are required to have training on how to read SDSs, correctly interpret symbols, and how to operate safety equipment necessary to remove the controlled substance from surfaces or themselves (e.g. eye wash stations, or emergency showers).

Retailers in the Northwest Territories and Nunavut have an additional requirement: they are considered suppliers of controlled products and must not only comply with WHMIS 2015, but also ensure customers purchasing controlled products are given an up-to-date SDS.

Like hazard assessments, the employer is responsible for analyzing the controlled products to be used in the work site and assess whether or not they present a hazard. In the case that a controlled product cannot be eliminated, the employer should substitute (if possible), or implement engineering or administrative controls to minimize the risk to workers. As a last resort, the employer must supply appropriate PPE to workers that will be exposed to the controlled product.

To create a hazardous materials program:

- 1.) Figure out who, or what position is in charge of managing the program. Who will update the SDSs, ensure products are properly labelled, and that all workers have been given sufficient training?
- 2.) Update the workers on who is responsible for the program. This is the person they should go to with questions about controlled products. Workers also need to know their roles in the hazardous materials program.
- 3.) Do a complete inventory of all controlled products, determine what products are required, and obtain SDSs for those products. (Note: this should be done annually)
- 4.) Determine what products are being used on site, and for which jobs. Are there any products being used for an alternative purpose that the product is not intended for? Are there products onsite that are no longer used? Properly dispose if there are.
- 5.) Create a policy for purchasing controlled products. The purchasing team should know a product is worth the money if it is less hazardous than its 'cheaper' counterpart as it is safer for the worker to use, decreases the amount of PPE (which would need to be purchased) or other hazard controls (which require time and money to develop) necessary.
- 6.) Establish a schedule for reviewing and updating SDSs.
- 7.) Make sure workers know where they can find the SDSs. They should be placed where the product is. There is no purpose of having a SDS in a main office, when the worker using the product is 10 kilometres away. Make them accessible.
- 8.) Determine what PPE is required for products that cannot otherwise be controlled.
- 9.) Create a log that includes the controlled product, the hazard, required PPE, and the expiration date of the SDS.
- 10.) Have an emergency plan in place for possible exposure scenarios and maintain safety equipment required on a regular basis to ensure it will work when it is needed.

Sample entry in a controlled product log:

Common Name	Hazardous Component	Known Hazards & Hazardous Interactions	Required PPE	SDS Expiry Date
Oven Cleaner	Sodium hydroxide	Corrosive. Causes severe skin burns and eye damage.	1.) Tightly-sealed goggles 2.) Protective gloves 3.) Alkaline-resistant protective apron	March 2018

## 10.2 PREVENTATIVE MAINTENANCE

Much like hazard assessments and inspections, preventative maintenance serves to uncover hazards before they lead to an incident. Management's role in this program is to ensure it is effective and is being managed by competent employees. Developing the preventative maintenance program will require industry specific knowledge and experience, in the equipment, tools, and vehicles to be maintained.

The preventative maintenance schedules should be performed according to the manufacturer's specifications. The supervisors and workers who create the schedules will need to call on their trade skills, technical knowledge and work experience to build the program requirements. Maintenance should not be a nice thing to do once in a while to extend the life of the equipment; it is a requirement.

Organizations may deviate from the manufacturer's recommended maintenance schedule when appropriate. For instance if one equipment brand recommends specific maintenance after 80 hours of use, and another recommends the same maintenance at 100 hours, the company may choose to perform maintenance on both pieces of equipment, using the lower hour requirement at 80 hours for simplicity. The organization would need to document their reason for deviating. In this case, the equipment serves the same purpose and is similar, just a different brand. It is easier to rotate the equipment for service if they fall under the same 80 hour schedule.

There might be times when the supervisor in charge of preventative maintenance needs to make a decision between conducting the maintenance on time or prioritizing production output. Sometimes this will happen under pressure from a customer or even upper management. Supervisors and workers must be able to count on management to support them in making decisions for safety, rather than focusing on getting the job done.

While it is easy to associate vehicles with preventative maintenance, vehicles are just one small part of the program. Preventative maintenance should be on all types of equipment, and may or may not include equipment below based on the industry:

- Commercial vehicles (including everything from the shop truck to the CEO's work truck);
- Rescue equipment for both the worker and the rescue team members;
- Water coolers (cleaning maintenance);
- Personal Protective Equipment: such as respirators, fall protection equipment, etc;
- Multifunction devices (print/fax/copy);
- Cranes, Hoists, Lifting Devices, and Rigging;
- Fire extinguishers and firefighting equipment;
- Gas and smoke monitors; and
- Forklifts, cherry pickers, skid steers, boom lifts and loaders, etc.

It may be more cost-effective to contract out some preventative maintenance, or arrange for owners to maintain the equipment as part of a rental agreement versus assigning the duty to a competent worker. No matter who completes the maintenance, it is important to maintain a record of it.

A sample of a commercial vehicle maintenance log is below:

Vehicle ID	Date	KM	Service Performed	By Whom
Unit 110	July 18, 2016	4900	Oil Change	Chris Thomson, Apprentice Mechanic (Supervised by Lou Tristan, Mechanic)
Unit 110	August 9, 2016	7367	Replaced rear differential axel seal	ABC Dealership
Unit 110	October 21, 2016	10,050	Oil Change	Phil Theiss (Mechanic)

## 11 TRAINING

Training is an administrative control used to ensure workers have the competencies required to perform tasks safely. Training workers so they can be safe at work is a legislated requirement in the *Occupational Health and Safety Regulations Part 3, Sections 12 (c) and 18*.

Training can be completed internally or by an external party. The requirements remain the same:

- The trainer needs to be qualified to train on the subject matter;
- Adequate space, equipment and time for the trainer to provide training, including hands-on learning;
- A fair way for the trainer to evaluate the level of learning, and what skills trainees can competently apply (verbal interview, demonstration, paper and pen test, or possibly a combination); and
- A way to document the training including recertification dates if needed.

Workers should expect to undergo training from a qualified individual who values their safety while they are learning. A worker in a training course who feels they are being asked to do unsafe tasks is required to report the situation to their supervisor, just as they would any other part of their job.

Training helps improve the overall safety of the workplace. Employers are investing in their workers and should expect participants to:

- Partake in all aspects of training and actively learn;
- Understand the subject matter, ask questions to clarify as necessary; and
- Be honest about their abilities once training has been completed; if they need more explanation, they should ask their supervisor for it.

In order for a worker to be considered competent, employers must have documented the worker going through the 5 steps of competency.



### 11.1 PRE-HIRE SCREENING

This step is completed through Human Resources. The job description and hiring sheet should outline specific education requirements for new hires. This means that all new workers entering a position will have the ability to perform the job safely.

Education requirements depend on the job and can include certificates, tickets, licenses, formal education/training, or a specified number of years in the industry. If a specific skill set or knowledge base is required for a task that is not included in the job description, Human Resources should be notified. This will increase the chances that an individual coming into a position will be successful and safe in their new job.

## 11.2 FORMAL ORIENTATION

Unlike on-the-job training (detailed below), formal training serves to provide the same information to all employees, regardless of their position or duties. This is normally completed through orientations and may include contractors and vendors in addition to workers and visitors.

It may be beneficial to break up the orientation into sections; to prevent a new worker or contractor from being overloaded with information. The purpose of the orientation is to ensure new workers are able to begin their job while following the company's policies. This includes all the topics/programs within the OHS Program discussed up to this point. For example: a comprehensive hazard assessment program will not be effective if new workers are not aware of their roles within it.

Safety topics for orientations can include:

- Welcome and IT set-up
  - Payroll; benefits; and review of job description.
- Occupational Health and Safety
  - Duties under *Safety Act* and applicable *OHS Regulations*.
- Hazards
  - Hazards in work environment; reporting; controls; and safe operating procedures.
- Inspections
  - Formal and informal.
- Programs
  - WHMIS, preventative maintenance, working alone, confined space etc.
- Training
  - Safety certifications; competency training.
- Emergency response plan and duties
  - General emergency response; first aiders; floor/shop wardens; muster points.
- Investigations
  - Organizational reporting requirements; WSCC reporting requirements.
  - Process for internal and external investigations; compliance with investigators or safety officers.
- Union
  - Union representative name and contact information.

Make sure all orientations are documented. This can be done through checklists, progress records, or acknowledgement forms. All these help keep the employer and worker informed on the status of the orientation. At the end of the orientation day(s), all new workers should have the same orientation completed.

### 11.3 ON-THE-JOB TRAINING

Like many other sections in the OHS Program, on-the-job training is broken into sub-sections. When a worker arrives at their new worksite, they should receive a worksite specific orientation. When they are expected to perform hazardous tasks they must undergo task-specific training.

#### Worksite Specific Orientation:

A documented orientation needs to happen when a new worker or contractor arrives at the worksite. A checklist of the topics covered along with signatures from the supervisor and the worker and the date it was conducted needs to be kept in the worker's training file.

The orientation should at minimum include:

- Worksite-specific emergency response plan;
- Types of alarm systems onsite;
- Evacuation process and muster points;
- Site walk around;
- Washrooms, break rooms/lunchrooms;
- Onsite hazards and controls;
- Location of SDSs/MSDSs; and
- Reminders, such as:
  - Duties under the *Safety Acts* and *OHS Regulations*
  - The organization's hazard reporting policy, highlighting any worksite-specific procedures; and
  - The organization's incident reporting policy.

#### Task Specific Training:

A worker may perform many tasks as part of their job duties, but not all may require specific training. This form of training should focus on the tasks which pose a risk to the worker. Part of the training will require a review of the formal and site-specific hazard assessments.

In order to provide valuable task-specific training, the supervisor and the organization must assess the tasks within the position and develop standards and procedures for the hazardous tasks. This development process includes:

- Identifying hazardous jobs and any hazardous tasks completed.
- Reviewing manufacturer requirements for equipment and tools, ensuring regulatory compliance by checking legislation.
- Considering special factors such as:
  - The impact on the organization if the task is not completed efficiently and safely.
  - Weather or other conditions outside the organization's control that may increase the risk of the task (eg. wind when performing crane lifts).
- Determining what skillsets are required to complete the hazardous task safely. These skills should be included in the job description.

Once the hazardous tasks have been identified, determine the procedures for establishing worker competency. The supervisor will need to break the task down into steps, identify areas that may be hazardous, and flag them as important for worker training. When the worker arrives for the task-specific training, the supervisor will have a checklist of steps to review with the worker, as well as a schedule for determining the worker's ability to safely complete the task.

- For each hazardous task, the supervisor must:
  - Demonstrate while explaining the steps of the task to the worker;
  - Provide the procedure for completing the task;
  - Discuss equipment and tool requirements;
  - Highlight the hazards of the task;
  - Answer the worker's questions;
  - Provide feedback for improvement;
  - Permit the worker to complete the task once they are satisfied the worker can do it safely. When allowing the worker to perform the task the supervisor should:
    - Verbally review the procedure, tools, important steps, hazards and controls for the task;
    - Coach the worker through the task, or observe if coaching is not necessary;
    - Provide feedback, answer any of the worker's questions; and
    - Repeat once the worker has completed the task with minimal coaching allow them to perform it on their own.
      - Expect minor errors; only intervene if it is critical. Wait till the task is done to review the errors and procedures.
  - Determine the level of the worker's understanding by asking questions and taking notes of the worker's progress; and
  - Document the training.

All training documents must be kept in the worker's training file. It may also be helpful for the supervisor to keep an on-going chart of the current workers, the types of training required for the worksite along with calendar reminders when refreshers are required. This can act as a quick reference guide for the supervisor.

## 11.4 SUPERVISION

A supervisor is in charge of making sure the organization's OHS Program is being communicated and followed. Ensuring workers are properly trained is an important part; checking in with workers to make sure they are still following correct procedures is equally important.

- Set-up a schedule to check in with the worker in the coming weeks and months to do a 'spot check'. The purpose of the spot check is to provide positive feedback and observations for improvement to ensure the worker continues to perform the task safely and in line with the procedures.
  - Document all spot checks, observations and feedback.

A supervisor will only be efficient at maintaining their workers' competency if the supervisor is also competent. The supervisor will not be able to provide appropriate feedback on the task, or perform proper spot checks if they cannot safely complete the task themselves. Supervisor competence is not something that can be assumed simply because they are in the role; management must ensure supervisors are competent.

### **11.5 MEETING COMPETENCY REQUIREMENTS**

Once a worker has undergone all the necessary training and their supervisor is confident that the worker can complete the role safely and effectively, the worker can be deemed competent. The meeting of competency must be documented for each worker, for all tasks.

To maintain competency, supervisors must regularly review training needs, schedule new training as dictated by industry or legislative standards, and schedule workers for refresher training as needed.

## 12 EMERGENCY RESPONSE PLAN

Most emergency situations are unexpected and require a quick, efficient response from everyone on site. Employers need to determine which emergency situations their workers may encounter and provide a written plan to protect their workers.

Emergency situations will produce unknown hazards, for which no controls have been implemented. These unseen hazards can significantly increase the danger of an emergency situation to workers, the organization, equipment and more. The only effective method for reducing risk during an emergency situation is to plan that the emergency will occur and prepare appropriately for it.

Emergency response plans need to be specific to the worksite; a plan developed for an office environment should not be used in the field. Every employer must consider the following when developing an emergency response plan:

- Potential emergencies:
  - Fire, explosions, chemical spills, natural disasters, power outages, structural failures, or motor vehicle collisions;
- Consequences of the emergency situation:
  - Worker injury, death or equipment damage.
- Emergency procedures:
  - The correct response for each emergency situation. Which worker will sound the fire alarm or notify the fire department? Should workers evacuate or take shelter and wait for rescue? Where will workers muster? What are the special provisions for workers with disabilities?
- Resources and supplies required:
  - First aid supplies, AED, fire extinguishers, panic buttons, rescue equipment, or self-contained breathing apparatuses.
- Additional Hazards:
  - Quantities, locations and storage methods of flammable substances at the worksite. Will these or other materials add to the danger of the emergency situation?
- Responsibilities:
  - Determine who is responsible for specific tasks during the emergency. Outline what a floor warden's duties are and what training will these individuals and all workers need to be successful in an emergency?

- Testing the plan:
  - Drills are a great opportunity to test established plans before an emergency occurs and are also a legislated requirement *OHS Regulations* 60(2), 394(2 and 3). Note that just because legislation states a drill only needs to be run once per year (fire drills) that does not mean doing one drill per year is considered best practice. A lot can change in the period of three months, staff turnover, new equipment, and different products arriving on site can impact the response. There is great value in running drills more than once per year. Drills can spotlight any hazardous situations that workers may encounter during a real emergency and provide the organization time to correct it.
  - Different drills should be considered also; only having a fire drill will not prepare employees to respond to a vehicle collision.

Depending on the scope of work completed for daily operations, there may be special circumstances that will require additional planning. Consider whether the location of the work is remote. Will it be done in areas with limited access? Will workers be in confined spaces or working at heights? Is there cellular service available or will workers need to return to their vehicles to access a radio? Environment specific scenarios need to be assessed and planned for in the emergency response plan.

The plan should also include details for workers returning to the field, shop, or office after an emergency. How they will be notified that it is safe to return? What is the process for the first day back (meeting, clean-up, altered duties)?

The emergency response plan must be communicated to everyone on site. Workers should have their first introduction to it during their orientation, be reminded of it regularly through safety meetings, see it posted in central locations and have a copy readily available at their workstation. In addition to the emergency response plan, important phone numbers should be listed such as fire, police, and ambulance. As there is no 9 1 1 service in the Northwest Territories or Nunavut, workers must be made aware of the appropriate emergency numbers.

Workers may need training for the emergency. If the plan dictates a worker should attempt to put out a small fire with an extinguisher, workers will need to be trained in how to operate a fire extinguisher.

## 12.1 DRILLS

Possible scenarios should be gathered from the hazard analysis and tested, at minimum, on a yearly basis. Each potential scenario should be tested separately; do not run a test for a fire and a bomb threat at the same time just for the sake of efficiency. By combining scenarios, issues or hazards may be missed. Be creative with the style of drills. Mix it up so management gets a good understanding of what the true reaction in an emergency will be (planned drill, surprise drill, role-playing, or a verbal walkthrough of the scenario).

Once the drill has been completed, the response should be evaluated. Have a checklist ready with specific questions to be answered at the end of the drill:

- Did everyone do what they were supposed to? Did they muster in the correct area?
- Did workers evacuate in a timely manner? Did they use the correct route for evacuation?
- Was everyone accounted for at the muster point? Was anyone missing? Was the attendance list brought and compared to the list of those present?
- Did the workers provide any feedback about the drill? Did something go wrong behind the scenes (e.g. machines did not shut down properly; obstacles blocked the evacuation route)?
- Was everyone able to identify what was going on by the alarm, or was there confusion? Did everyone know what was expected of them?

Based on the results of the drill, management can begin rectifying issues and hazards brought to light. Management should assign responsibility for correcting issues discovered during the drill, along with an expected timeframe for it to be completed.

## 13 INCIDENTS AND INVESTIGATIONS

### 13.1 INCIDENTS

An incident is an opportunity to improve the program. There will be times when incidents occur even when an organization has a comprehensive and updated OHS Program in place. All incidents need to be reported in order to correct deficiencies in the program. If they are not reported similar incidents cannot be prevented in the future. Dangerous occurrences, near miss incidents and unsafe work refusals are just as important to report and investigate as incidents involving a severe injury.

A near miss is a rare “safety freebee”; the next time a worker and the organization may not be as lucky.

Proper reporting improves the OHS Program on multiple levels by:

- Identifying issues within the program, safe operating procedures, and equipment choices;
- Highlighting where additional training is needed;
- Creating an opportunity to collect information for statistics; and
- Gathering data on incident trends.

Management needs to define what and how incidents are reported internally and externally to the WSCC (Dangerous Occurrences and Incidents causing Serious Bodily Harm). When unique incidents occur such as situations involving wildlife, the public, environment, or workers travelling or working alone, the organization will need to determine if separate forms are needed to meet reporting needs. Management should compile a list to reflect the types of hazards workers within the organization may encounter.

At minimum, all reporting forms must include the following:

- What type of incident occurred (loss, wildlife, near miss, injury, environmental damage);
- When the incident happened and when it was reported (date and time for both);
- Where the incident occurred;
- Details of the scenario. Collect as much information as possible on what happened just before, during and immediately after the incident;
- Who was involved and any witnesses; include their contact information;
- Any follow-up required to further control the situation; and
- Signatures from the worker and supervisor submitting the report.

Reporting forms should be completed immediately after an incident. Stress and emotions may be elevated, which is why it is important to keep forms simple; non-essential information will complicate the situation. Leave plenty of space for the worker to fill in important details. Make sure the forms can be easily accessed so a worker does not need to go out of their way to find one. Procedures for filling in reporting forms should be in writing and also accessible to workers, contractors, and visitors. Ensure everyone knows they are responsible for reporting all incidents, including near misses, in a timely manner.

The ACTION form below is an example of a type of reporting form that can be used for incidents where hazards have been controlled and workers have not been injured.

# A.C.T.I.O.N.

May 2017

## Awareness Change Teach Initiate Observe Notify

Form completed by: \_\_\_\_\_ Department: \_\_\_\_\_

Date: \_\_\_\_\_ Time: \_\_\_\_\_ Location: \_\_\_\_\_

**Action type:**      Positive Observation    Recommendation    Near Miss    Hazard    Other

**Division:**         Yellowknife    Inuvik    Iqaluit         Other

**Comment:** (What are you reporting?)

---

---

---

**Reported to:** (What action did you take?)

---

---

---

**Corrective action:** (how did you rectify the problem? what would you recommend?)

---

---

---

Thank you for using the (**insert organization name**) ACTION card. Please discuss this issue with your Supervisor and then forward your completed card to the Health & Safety Officer in person or by email to:

**HealthandSafetyOfficer@yourorganizationemail.com**

### INTERNAL ONLY

**Follow up:**

---

---

---

Assigned To: \_\_\_\_\_ Date Completed: \_\_\_\_\_

## 13.2 INVESTIGATIONS

During the course of an investigation, an investigator may hear witnesses or workers say: “well, it is just common sense that you don’t \_\_\_\_\_.” The investigator must keep in mind that the reason policies, procedures, and programs exist is because common sense does not exist. An individual’s understanding of a situation is shaped by their education and life experiences; no understanding or experience is commonly shared within a group of people.

Once an incident has been reported, it needs to be properly investigated to determine the root cause(s). Management must develop a written standard for when and how investigations will be conducted. The focus of any investigation must be on finding out the facts, rather than assigning blame. This does not mean a root cause will not tie back to a department or position; it means the results will focus on where the OHS Program failed the worker, and not where a worker may have made an error.

If workers are relying on perceived common sense to keep them safe, then their organization is failing to protect them.

By developing a policy for incident investigations, management should be able to outline:

- The reason the organization investigates incidents, whether it is;
  - To determine the root cause(s).
  - To improve worker safety.
  - To prevent reoccurrence.
  - To implement better ways of controlling hazards.
  - To put in place new control measures for a previously unidentified hazard.
- The responsibilities all employees (including management) have during an investigation;
- Descriptions of what an incident is and the timeframe for an investigation to be completed;
- What position is responsible for follow-up when recommendations are made once the investigation is complete; and
- How workers will be notified of the results of the investigation and what steps they can take to prevent a similar incident from happening again. If the findings of an investigation are not shared with the workers an opportunity to educate them has been missed.

### 13.2.1 Investigation prep

Investigation kits remove the stress of attempting to locate equipment, supplies, and tools needed to conduct an investigation once an incident has occurred. It is best to have everything the investigator(s) will need in one place so the individual in charge can grab their kit and head immediately to the scene.

A fully stocked and regularly inspected kit must be available at all worksites, and a mobile kit should be on hand for offsite work. The contents of the kit will vary depending on the organization and the type of work performed.

Below is a basic list:

- Report forms for the organization and for the WSCC
- Site maps and basic floor plans
- Paper, clip boards, folders, pens, pencils, and adhesive tape
- Large tape measure
- Battery operated lanterns, or flashlights
- Camera
- Tape recorder
- Spare batteries
- Flagging tape
- Pylons
- Collection supplies:
  - Gloves
  - Sealable plastic bags
  - Containers/jars with lids
- For outdoor work it would be beneficial to include:
  - Tarps (tent enclosure, plus assembly tools)
  - Waterproof paper
  - High-visibility PPE

### **13.2.2 Investigation roles**

The team that conducts the investigation must be comprised of employees who have the required competency to complete the task involved in the incident. There is value in having workers who are not familiar with the specific work environment provide a fresh set of eyes and feedback on procedures, but that should happen during inspections (Section 9) and not during investigations. For example, when investigating an incident where a worker fell from a roof, workers who perform roofing activities and have fall protection training should be involved in the investigation.

During an investigation there are different roles and responsibilities, some of which are listed below (these roles may vary depending on the urgency of the situation):

- All employees:
  - Make sure the area is safe before continuing with work, attempting to offer assistance or preserving the scene of the incident; and
  - Follow the emergency response plan.
- Management:
  - Contact the WSCC or necessary government authorities;
  - Approve recommendations made by investigators and provide feedback, options, and support for decisions which cannot be approved;
  - Finalize the incident report and close the file; and
  - Review the investigation process and make improvements to the procedures and policies.

- Investigators:
  - If there is a potential for more injuries, issue a stop-work order for the area;
  - Preserve evidence, block off the area of the incident if necessary, and lock-out machinery;
  - Begin the investigation process as soon as possible after the incident (while workers' memories, the scene and evidence are still fresh);
  - Collect witness names and contact information;
  - Notify management of the investigation and additional agencies if required (WSCC, RCMP);
  - Assist investigators from other agencies as necessary;
  - Take photographs, document the scene, and gather evidence;
  - Interview workers involved in the incident;
  - Interview witnesses to the incident;
  - Analyze the incident, determine what factors are involved and what the root causes are;
  - Be courteous and professional during the investigation. Do not assign blame or speculate; do not jump to conclusions, follow the evidence.
  - Fill in the reporting forms required for the organization;
  - Make recommendations to correct deficiencies in the program (root causes and additional factors);
  - Determine timeframes for the recommendations to be completed by, select specific individuals who have the competency and authority to fulfill the recommendations; and
  - Provide management a copy of the report, recommendations, supporting documents, and evidence (Appendix A).
- Employees instructed to action investigator recommendations:
  - Fulfill recommendations within the given timeframe;
  - Keep management updated on the status of recommendations; and
  - Remember the recommendations have been made to improve worker safety. Cutting corners does not contribute to a safe work environment.

### 13.2.3 Root cause

As the investigation team assesses the facts, there may be some confusion over the factors involved versus the root cause of the incident. A root cause is the true reason an incident occurred: it set off a chain reaction and the other factors involved further contributed to the incident. Without the root cause, the incident could not have happened.

It is important that the investigation team differentiates between the two so they do not stop looking once they have found contributing factors. They need to keep digging for the root cause. While it is important to address all factors involved in an incident (some factors uncovered will have hazards requiring control), the root cause is the investigation team's top priority. The situation in the chart below outlines the differences between a contributing factor and the root cause.

Once the root causes have been determined, actions to correct inadequacies need to take place. A specific individual needs to be in charge and held accountable for actioning the corrections to take place within a specified timeframe. By implementing recommendations from the investigation team, the organization can prevent reoccurrence, protect their workers, and strengthen their OHS Program.

Type	Description
Incident	A mechanic's arm was crushed when working underneath a skid steer. The mechanic was working in a remote area and did not have access to jacks so they used wood blocks. One of the wood blocks slipped and the machine crushed their arm. The mechanic's radio was in their bag, and during brief moments of consciousness they were unable to use the radio as it was out of reach. The mechanic was working alone. Two hours after the incident occurred their supervisor realized the worker was an hour late in checking in and sent another worker to check on them. An ambulance arrived four hours after the incident occurred; the mechanic's arm was amputated at the hospital.
Contributing Factors	<ul style="list-style-type: none"> <li>• Use of wood blocks</li> <li>• Maintenance was done on uneven ground</li> <li>• Radio out of reach</li> <li>• Delayed medical response</li> </ul>
Root Causes	<p>Improper delegation of overtime hours:</p> <ul style="list-style-type: none"> <li>• Mechanic was on 30<sup>th</sup> hour of overtime in the week, which impacted the decision to use the wood blocks. They wanted to get home so they used what was on hand instead of waiting an hour or more for the jacks to arrive. This also affected the decision to perform maintenance on uneven ground instead of waiting for a truck to bring the skid steer back to the shop.</li> <li>• Mechanic is on a short-staffed shift, resulting in more overtime hours than usual; HR has not hired a new mechanic to fill a vacancy.</li> </ul> <p>Inadequate supply of jacks:</p> <ul style="list-style-type: none"> <li>• The shop only has a handful of jacks; mechanics are not allowed to take them in their work trucks unless they know they will be used.</li> </ul> <p>Inadequate equipment procedures:</p> <ul style="list-style-type: none"> <li>• Mechanics are instructed to call in for supplies to be run out to them instead of removing expensive supplies from the shop beforehand.</li> </ul> <p>Inadequate working alone procedures:</p> <ul style="list-style-type: none"> <li>• Radio was not located on the worker; it was left in the travel bag, which has become common practice for shop workers due to the bulk of gear they normally wear.</li> <li>• Check-in and follow-up was not completed as scheduled due to overbooking of the supervisor in meetings. This caused a delay in sending someone to the worksite to check on the mechanic.</li> </ul>

The above scenario identifies 6 root causes; 5 of which are administrative controls and 1 engineering control. Had these controls been adequately identified the incident would not have occurred.

### 13.3 STATISTICS

The data collected from incidents contains valuable information for statistical analysis. Reports can be used to identify trends and determine how the organization is performing from a safety perspective. Information collected is part of the Study stage of the PDSA Cycle discussed in section 5.

Annual Statistical Reporting is also a Legislative requirement in both the Northwest Territories and Nunavut as identified in Section 11. of the Occupational Health and Safety Regulations.

Two types of statistics are used in OHS Programs.

- Leading Indicators: how many inspections were conducted, how many safety meetings, how many hazard identifications were received and actioned.
- Lagging Indicators: frequency and severity should be tracked by the organization as they are used to determine the level of loss over a span of time.

$$\text{Injury Frequency} = \frac{\text{Number of Lost-Time Injuries} \times 200,000}{\text{Number of Hours Worked}}$$

$$\text{Injury Severity} = \frac{\text{Number of Lost Days} \times 200,000}{\text{Number of Hours Worked}}$$

Management can also track driving frequency for workers who travel for work, or frequency of injuries while using a specific machine. The more data collected, the more the organization will be able to use statistics to see how well or how poorly the OHS Program is operating and what areas require improvement.

## APPENDIX A – INCIDENT INVESTIGATION REPORT

Employee Information		
Last Name:	First Name:	Middle Initial(s):
Work Phone Number:	Home Phone Number:	
Employment Information		
Site Location:	Employee #:	
Date of Hire:	Language (If other than English):	
Occupation / Job at Time of Incident:	Length of Time in Occupation / Job: _____ Years _____ Months _____ Days	
Type of Employment (check all which apply): <input type="checkbox"/> Full Time <input type="checkbox"/> Part Time <input type="checkbox"/> Hourly <input type="checkbox"/> Salary <input type="checkbox"/> Casual		
Contractor <input type="checkbox"/> Name of Company:		
Details of Investigation		
Site:	Department:	Exact Location of Incident on the Premises:
Immediate Supervisor:		
Incident Date:	Month: _____ Day: _____ Year: _____	Time: _____ am [ ] pm [ ]
Date Reported:	Month: _____ Day: _____ Year: _____	Time: _____ am [ ] pm [ ]
Date of Investigation:	Month: _____ Day: _____ Year: _____	Time: _____ am [ ] pm [ ]
TYPE: <input type="checkbox"/> Incident <input type="checkbox"/> Near Miss <input type="checkbox"/> Property Damage <input type="checkbox"/> Dangerous Occurrence		
WSCC Report required: <input type="checkbox"/> Yes <input type="checkbox"/> No      WSCC Report Completed: <input type="checkbox"/> Yes <input type="checkbox"/> No		
INJURY / ILLNESS: <input type="checkbox"/> None <input type="checkbox"/> First Aid <input type="checkbox"/> Medical Aid <input type="checkbox"/> Hospital <input type="checkbox"/> Fatality		<input type="checkbox"/> No Lost Time <input type="checkbox"/> Lost Time
Part of Body Injured: (Provide a detailed description and specify left or right, front or back)		
Has the injured worker had a previous similar injury? <input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, describe in detail)		

Medical Treatment Information	
Name of First Aid Attendant:	Injury Recorded in First Aid Log? <input type="checkbox"/> Yes <input type="checkbox"/> No
Type of First Aid Administered:	
Clinic / Hospital sent to:	
Attending Physician / Paramedic (if known):	
Attending Police Officer (if known):	
Property	
Property Damaged:	Estimated Cost of Damage: \$
Description of Damaged Property:	
Witness Information	
Number of Witnesses: ____ <b>ATTACH WITNESS STATEMENT(S) FOR EACH WITNESS</b>	
Investigation Information	
<b>Type of Incident:</b> <input type="checkbox"/> Assault <input type="checkbox"/> Break <input type="checkbox"/> Caught In <input type="checkbox"/> Caught On <input type="checkbox"/> Caught Between <input type="checkbox"/> Cut On <input type="checkbox"/> Exposure <input type="checkbox"/> Fall <input type="checkbox"/> Overexertion <input type="checkbox"/> Strain <input type="checkbox"/> Struck By <input type="checkbox"/> Struck Against <input type="checkbox"/> Trip <input type="checkbox"/> Other (specify):	
<b>Contact With:</b> <input type="checkbox"/> Cold <input type="checkbox"/> Heat <input type="checkbox"/> Electricity <input type="checkbox"/> Fire <input type="checkbox"/> Noise <input type="checkbox"/> Pressure <input type="checkbox"/> Equipment <input type="checkbox"/> Caustic Chemical (specify): _____ <input type="checkbox"/> Toxic Chemical (specify): _____ <input type="checkbox"/> Other (specify): _____	
Describe in detail the <b>SEQUENCE OF EVENTS</b> leading up to the incident. (ie. where the incident occurred; what the employee was doing at the time; the size, type, and weight of equipment or materials involved; weather conditions, etc.). Use additional pages if required and provide diagrams, photographs, and reports.	
Diagram / Photographs attached <input type="checkbox"/> Yes <input type="checkbox"/> No <b>ALL EVIDENCE / INFORMATION GATHERED FOR INVESTIGATION TEAM ONLY</b>	

**Identify all UNSAFE ACTS which contributed to the incident: (check off as many as necessary)**

<input type="checkbox"/> Operating Without Authority	<input type="checkbox"/> Horseplay	<input type="checkbox"/> Servicing Operating Equipment
<input type="checkbox"/> Unsafe Loading / Unloading	<input type="checkbox"/> Inadequate Lighting	<input type="checkbox"/> Using Defective Tools
<input type="checkbox"/> Unsafe Mixing / Combining	<input type="checkbox"/> Working at Unsafe Speed	<input type="checkbox"/> Using Defective Equipment
<input type="checkbox"/> Failure to Wear Proper PPE	<input type="checkbox"/> Distracting	<input type="checkbox"/> Working on Moving Equipment
<input type="checkbox"/> Failure to Warn Properly	<input type="checkbox"/> Teasing	<input type="checkbox"/> Improper Lifting
<input type="checkbox"/> Failure to Secure Properly	<input type="checkbox"/> Harassment	<input type="checkbox"/> Unfit for Duty (possible impairment/intoxication)
<input type="checkbox"/> Unsafe Position or Posture	<input type="checkbox"/> Hazardous Personal Attire	<input type="checkbox"/> Making Safety Device Inoperable

Other (specify):

**Identify all UNSAFE CONDITIONS which contributed to the incident: (check off as many as necessary)**

<input type="checkbox"/> Inadequate Guards / Barriers	<input type="checkbox"/> Gases	<input type="checkbox"/> Hazardous Environmental Conditions
<input type="checkbox"/> Improper or Inadequate PPE	<input type="checkbox"/> Dusts	<input type="checkbox"/> Extreme Weather Conditions
<input type="checkbox"/> Inadequate Lighting	<input type="checkbox"/> Fumes	<input type="checkbox"/> Extreme Temperature(s)
<input type="checkbox"/> Unsafe Job Design	<input type="checkbox"/> Vapours	<input type="checkbox"/> Noise Exposure
<input type="checkbox"/> Congested Work Area	<input type="checkbox"/> Smoke	<input type="checkbox"/> Unsafe Mobile Equipment
<input type="checkbox"/> Inadequate Warning Systems	<input type="checkbox"/> Explosion Hazard	<input type="checkbox"/> Defective Tools or Equipment
<input type="checkbox"/> Poor Housekeeping	<input type="checkbox"/> Fire Hazard	<input type="checkbox"/> Defective Materials

Other (specify):

Identify all INDIRECT CAUSES which contributed to the incident: (check off as many as necessary)	
Personal Factors	Job Factors
<input type="checkbox"/> Inadequate Physical Capability	<input type="checkbox"/> Inadequate Leadership or Supervision
<input type="checkbox"/> Abuse or Misuse of Equipment	<input type="checkbox"/> Inadequate Engineering Controls
<input type="checkbox"/> Physical Stress	<input type="checkbox"/> Inadequate Purchasing
<input type="checkbox"/> Mental Stress	<input type="checkbox"/> Inadequate Maintenance (scheduled or preventative)
<input type="checkbox"/> Lack of Knowledge	<input type="checkbox"/> Inadequate Tools or Equipment
<input type="checkbox"/> Lack of Skill	<input type="checkbox"/> Inadequate Work Standards
<input type="checkbox"/> Improper Motivation	<input type="checkbox"/> Wear and Tear
<input type="checkbox"/> Other:	<input type="checkbox"/> Other:
Identify all ROOT CAUSES which contributed to the incident: (check off as many as necessary)	
<input type="checkbox"/> Management Commitment & Administration	<input type="checkbox"/> Emergency Preparedness and Response
<input type="checkbox"/> Leadership Training	<input type="checkbox"/> Company Safety Rules and Work Permitting
<input type="checkbox"/> Planned Inspections	<input type="checkbox"/> Worker Knowledge and Skill Training
<input type="checkbox"/> Preventive Maintenance	<input type="checkbox"/> Personal Protective Equipment (PPE)
<input type="checkbox"/> Hazard Identification	<input type="checkbox"/> Personal or Group Communications
<input type="checkbox"/> Safe Work Procedures and/or Practices	<input type="checkbox"/> Hygiene and Sanitation
<input type="checkbox"/> Inadequate Previous Incident Investigation/ Follow-up	<input type="checkbox"/> Hiring and Placement Standards
<input type="checkbox"/> Purchasing Controls	<input type="checkbox"/> Other(s);

Prevention			
(Number those actions required to Prevent Recurrence of a similar incident, 1 being most critical in order of priority)			
<input type="checkbox"/> Training / Retraining of Involved Worker(s)	<input type="checkbox"/> Improve Safety Inspection Process		
<input type="checkbox"/> Job Procedure / Design Changes	<input type="checkbox"/> Reassignment of Involved Worker		
<input type="checkbox"/> Equipment Repair or Replacement	<input type="checkbox"/> Liaison with Manufacturer of Equipment / Tool		
<input type="checkbox"/> Perform In-depth Hazard Identification and Analysis	<input type="checkbox"/> Facilities Layout Review and Redesign		
<input type="checkbox"/> Improved Hazard Controls (Engineering / Admin. / PPE)	<input type="checkbox"/> Installation of Safety Guards / Barriers		
<input type="checkbox"/> Supervisory Communication	<input type="checkbox"/> Other (specify):		
<b>Describe Action(s) Taken to Prevent Recurrence (short-term and long-term)</b>			
<b>Assignment of Action Item(s)</b>			
Action item:	Responsible:	Date of completion:	Sign-off:
Action item:	Responsible:	Date of completion:	Sign-off:
Action item:	Responsible:	Date of completion:	Sign-off:

Investigation Team (First and Last Names)					
Lead Investigator	Position and Department				
Investigator	Position and Department				
Investigator	Position and Department				
Lead Investigator Comments:					
<table style="width: 100%; border: none;"> <tr> <td style="width: 33%;">Lead Investigator Name (print):</td> <td style="width: 33%;">Signature:</td> <td style="width: 33%;">Date:</td> </tr> </table>			Lead Investigator Name (print):	Signature:	Date:
Lead Investigator Name (print):	Signature:	Date:			
Involved Worker(s) Comments:					
<input type="checkbox"/> Employee Statement Attached					
<table style="width: 100%; border: none;"> <tr> <td style="width: 33%;">Employee Name (print):</td> <td style="width: 33%;">Signature:</td> <td style="width: 33%;">Date:</td> </tr> </table>			Employee Name (print):	Signature:	Date:
Employee Name (print):	Signature:	Date:			
Additional Management Comments:					
<table style="width: 100%; border: none;"> <tr> <td style="width: 33%;">Manager Name (print):</td> <td style="width: 33%;">Signature:</td> <td style="width: 33%;">Date:</td> </tr> </table>			Manager Name (print):	Signature:	Date:
Manager Name (print):	Signature:	Date:			
Investigation Number:					

## APPENDIX B – SAMPLE OHS PROGRAM TABLE OF CONTENTS

1. Policy
  - 1.1 Governance
    - 1.1.1 Upper Management Involvement
  - 1.2 Health and Safety Policy Statement
    - 1.2.1 Commitment Statement/Expectations
  - 1.3 Rights and Responsibilities
    - 1.3.1 Right to Know
      - 1.3.1.1 Worker Responsibilities
      - 1.3.1.2 Management Responsibilities
    - 1.3.2 Right to Participate
      - 1.3.2.1 Worker Responsibilities
      - 1.3.2.2 Management Responsibilities
    - 1.3.3 Right to Refuse
      - 1.3.3.1 Worker Responsibilities
      - 1.3.3.2 Management Responsibilities
  - 1.4 Policy Responsibility
    - 1.4.1 Upper Management
    - 1.4.2 Management/Supervisors
    - 1.4.3 Workers
  - 1.5 Policy Accountability
    - 1.5.1 Upper Management
    - 1.5.2 Management/Supervisors
    - 1.5.3 Workers
- 2 Hazards
  - 2.1 Hazard Identification
    - 2.1.1 Procedures
    - 2.1.2 Responsibilities
    - 2.1.3 Reporting
  - 2.2 Hazard Assessment
    - 2.2.1 Formal, Informal, Ongoing
    - 2.2.2 Competency
    - 2.2.3 Procedures
    - 2.2.4 Responsibilities
  - 2.3 Hazard Control
    - 2.3.1 Procedures
    - 2.3.2 Responsibilities
    - 2.3.3 Follow-up

- 3 Inspections
  - 3.1 Formal Inspections
    - 3.1.1 Procedures
    - 3.1.2 Reporting
    - 3.1.3 Upper Management Responsibilities
    - 3.1.4 Management/Supervisor Responsibilities
    - 3.1.5 Worker Responsibilities
  - 3.2 Informal inspections
    - 3.2.1 Procedures
    - 3.2.2 Reporting
    - 3.2.3 Upper Management Responsibilities
    - 3.2.4 Management/Supervisor Responsibilities
    - 3.2.5 Worker Responsibilities
- 4 Programs
  - 4.1 Working Alone
    - 4.1.1 Upper Management Responsibilities
    - 4.1.2 Management/Supervisor Responsibilities
    - 4.1.3 Worker Responsibilities
  - 4.2 Hazardous Materials
    - 4.2.1 Procedures
    - 4.2.2 Competency
    - 4.2.3 Record Keeping
    - 4.2.4 Upper Management Responsibilities
    - 4.2.5 Management/Supervisor Responsibilities
    - 4.2.6 Worker Responsibilities
  - 4.3 Preventative Maintenance
    - 4.3.1 Procedures
    - 4.3.2 Competency
    - 4.3.3 Record Keeping
    - 4.3.4 Reporting
    - 4.3.5 Upper Management Responsibilities
    - 4.3.6 Management/Supervisor Responsibilities
    - 4.3.7 Worker Responsibilities
  - 4.4 Fall Protection
    - 4.4.1 Procedures
    - 4.4.2 Competency
    - 4.4.3 Record Keeping
    - 4.4.4 Upper Management Responsibilities
    - 4.4.5 Management/Supervisor Responsibilities
    - 4.4.6 Worker Responsibilities

- 4.5 Procurement
  - 4.5.1 Procedures
  - 4.5.2 Record Keeping
  - 4.5.3 Upper Management Responsibilities
  - 4.5.4 Management/Supervisor Responsibilities
  - 4.5.5 Worker Responsibilities
- 5 Training
  - 5.1 Pre-Hire Screening
    - 5.1.1 Procedures
    - 5.1.2 Record Keeping
    - 5.1.3 Responsibilities
    - 5.1.4 Competency
  - 5.2 Formal Orientation
    - 5.2.1 Procedures
    - 5.2.2 Record Keeping
    - 5.2.3 Competency
    - 5.2.4 Upper Management Responsibilities
    - 5.2.5 Management/Supervisor Responsibilities
    - 5.2.6 Worker Responsibilities
  - 5.3 On-The-Job-Training
    - 5.3.1 Worksite Specific Orientation
      - 5.3.1.1 Procedures
      - 5.3.1.2 Record Keeping
      - 5.3.1.3 Competency
      - 5.3.1.4 Upper Management Responsibilities
      - 5.3.1.5 Management/Supervisor Responsibilities
      - 5.3.1.6 Worker Responsibilities
    - 5.3.2 Task Specific Training
      - 5.3.2.1 Procedures
      - 5.3.2.2 Record Keeping
      - 5.3.2.3 Competency
      - 5.3.2.4 Upper Management Responsibilities
      - 5.3.2.5 Management/Supervisor Responsibilities
      - 5.3.2.6 Worker Responsibilities
    - 5.3.3 Supervision
      - 5.3.3.1 Procedures
      - 5.3.3.2 Record Keeping
      - 5.3.3.3 Competency
      - 5.3.3.4 Upper Management Responsibilities
      - 5.3.3.5 Management/Supervisor Responsibilities
      - 5.3.3.6 Worker Responsibilities

- 6 Emergency Response
  - 6.1 Assessment
    - 6.1.1 Potential Emergencies
    - 6.1.2 Consequences
    - 6.1.3 Procedures
    - 6.1.4 Hazards
    - 6.1.5 Record Keeping
    - 6.1.6 Upper Management Responsibilities
    - 6.1.7 Management/Supervisor Responsibilities
    - 6.1.8 Worker Responsibilities
  - 6.2 Drills
    - 6.2.1 Procedures
    - 6.2.2 Record Keeping
    - 6.2.3 Responsibilities
- 7 Incidents
  - 7.1 Procedures
  - 7.2 Reporting
  - 7.3 Record Keeping
  - 7.4 Joint Occupational Health and Safety Committee Responsibilities
  - 7.5 Upper Management Responsibilities
  - 7.6 Management/Supervisor Responsibilities
  - 7.7 Worker Responsibilities
- 8 Investigations
  - 8.1 Procedures
  - 8.2 Reporting
  - 8.3 Record Keeping
  - 8.4 Joint Occupational Health and Safety Committee Responsibilities
  - 8.5 Upper Management Responsibilities
  - 8.6 Management/Supervisor Responsibilities
  - 8.7 Worker Responsibilities
- 9 Definitions and Key Concepts

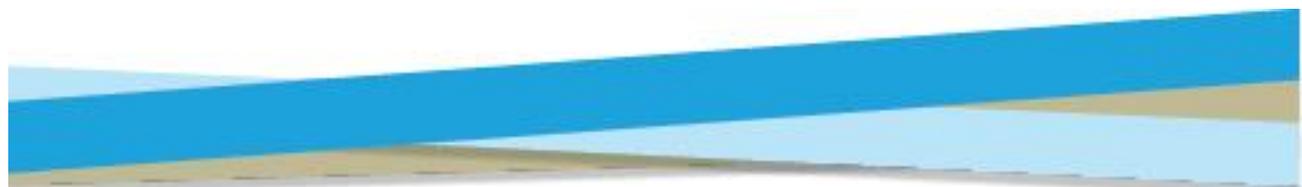
# Occupational Health and Safety Programs

Workers' Safety & Compensation Commission  
Northwest Territories and Nunavut

WSCC Emergency Reporting  
24-hour Incident Reporting Line

**1 800 661-0792**

**WSCC**



If you would like this Code of Practice in another language, please contact us.