

Health & Safety

Background

- Brampton is required to comply with the *Occupational Health & Safety Act* of Ontario (OHSA) which is overseen by the Ministry of Labour, Immigration, Training and Skills Development (MLITSD).
- The framework for health, safety and wellness activities is outlined in the Occupational Health & Safety Policy (HRM-110).
- Several standard operating procedures, programs, guidelines, and service cards are in place to provide guidance to operating departments on health and safety-related activities.
- Health, Safety, and Wellness (HSW) is a section in Human Resources and its objective is to provide advice and guidance to the operating departments to reduce the risk of illness or injury.
- There are six multisite Joint Health and Safety Committees (JHSC) within the City.
- An occupational health & safety management system (OHSMS) is expected to be implemented in early 2024.
- The audit focused on workplace health and safety activity from Jan. 1, 2020, to Dec. 1, 2022.

Audit Objectives and Scope

The audit aimed to evaluate the effectiveness of the City's Health & Safety framework. We assessed whether:

1. Workplace health and safety activities comply with the Occupational Health & Safety Act
2. Policies, standard operating procedures and programs are in place and current for core workplace health and safety activities
3. Safety training is provided to all workers, addresses relevant risks, and is monitored
4. Workplace risk assessments and hazard identifications, safety inspections, incident investigations are properly conducted, documented, communicated, reviewed, and followed up
5. Joint Health & Safety Committees have adequate participation among workers and management, and are properly supported
6. Systems/software are fully utilized to report, review, and monitor health and safety activities
7. Safety performance metrics are properly captured, tracked, and reported.

Finding #1: Monthly JHSC inspections are not always completed

1. Average completion rate is 83%, ranging from 75% to 96%
2. Inspection schedules are not always updated after completing inspections
 - The JHSC's terms of reference requires the creation and maintenance of a schedule of inspections.
 - One committee had not recorded any inspections in their schedule, and some committees had partially recorded inspections.
3. Inspections requiring follow-up are not always closed in the system in a timely manner
 - Agilepoint has four statuses: Complete, Assign to Supervisor, In-Progress, or Rework Required.
 - 97% of all inspections in 2021 and 2022 are "Complete"; 111 were not complete and were open for more than one month; 54 of these were from 2021. Inspection findings should be followed up within a week and "Closed" once corrective action is complete.

Finding #2: Key Health & Safety Data is not being reported

A number of key health and safety statistics are currently not being reported such as:

- Top 5 types of accidents
- Top 5 causes of accidents
- # of critical injuries
- Total lost days
- Ministry of Labour Orders
- Number of work refusals

Finding #3: Required Health & Safety Training is not always complete

1. Health and Safety training is completed within the Talent, Learning and Management System (TLMS).
2. Every year, all employees are required to complete the following three health & safety courses; Occupational Health & Safety Policy (HRM-110), Workplace Violence Prevention Policy (HRM-120) and Respectful workplace policy (HRM-150).
3. A review of health & safety training noted that:
 - Overall completion rate for these three mandatory courses was only 56% in 2022.
 - Current system does not allow for easy oversight of training completion. TLMS only shows information for direct reports, not at a department or division level.

Finding #4: Processes for Health & Safety Activities are inconsistent

Health and Safety processes differ between divisions and departments. Some process steps are automated in one division/department while the same process in another division or department is completed manually such as:

1. Incident Reporting – One division uses an Agilepoint form to report incidents, some departments are using a different Agilepoint form (Pilot project) and all other departments are manually filling out a paper form (SREA).
2. Risk Assessments – Some departments are using an electronic form to complete risk assessments while all other departments are manually filling out a paper template.
3. Inspections – One division uses the Agilepoint form as well as manual checklists to record inspections (Based on facility type), while all other divisions use only the automated Agilepoint form.

Finding #5: Standard Operating Procedures are not current

1. Health and safety processes are guided by Standard Operating Procedures (SOP).
2. SOPs have been developed and implemented at the organization and department level.
3. Out of approximately 20 SOPs at the organization level, 5 of them have a “Review Date” from 2012 or 2013. The other SOPs were created in 2018, however have not been reviewed since.

Finding #6: Incident data is not always entered in a timely manner.

1. For any workplace incident, the Supervisor of the injured employee must complete a Supervisor report of employee accident (SREA) or a Workplace Injury and Illness report (WIIR).
2. All incidents resulting in healthcare or lost time require an “Employers Report of Injury/Disease” to be sent to WSIB within 7 days of HR being notified of the injury.
3. We reviewed 7 incident reports involving healthcare and/or lost time and found:
 - One of the incidents was not entered into the incident reporting system (Parklane)
 - Out of the other six incidents, only one Employers Report of Injury/Disease was sent to WSIB within the required 7 day window. The time between the incident notification date and the report being sent to WSIB was between 7 and 23 days with an avg. of 15 days.

Conclusion

All core elements of an effective health and safety framework are in place, however, improvements can be made in the performing and/or reporting of inspections, incidents, risk assessments and training.

Thank you!

