Winnipeg

# *Workplace Safety Audit – Final Report*
# *November 2013*

*Leaders in building public trust in civic government*

Audit Department

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## REPORT HIGHLIGHTS

A primary focus of the City's workplace safety program has been on reducing Loss Time Injuries (LTI) by 25% since it was highlighted as an area of focus in 2009. The City's LTI rate has remained stable over this period and the targeted decrease has not occurred despite the City's efforts to address this issue. In 2012, safety related incidents accounted for 103,790 hours lost and $9.0 million in Workers Compensation related costs, an increase of 32% in one year. While the City at both the organizational level and departmental level have developed and implemented components of a comprehensive safety program, we believe that there are areas that can be enhanced to support the achievement of the City's ultimate goal which is a workplace free from injuries.

The *Administrative Standard HR-010 Organizational Safety Governance* (Administrative Standard HR-010) provides the governance framework for the workplace safety program for the City. However, the roles and responsibilities outlined in the Administrative Standard HR-010 and the protocols and procedures need to be better communicated and a complete set of minimum safety standards needs to be established. These minimum safety standards should address qualifications, training and the monitoring and reporting of compliance with the Act.

The oversight role, at both the organizational and departmental level, needs to be expanded and strengthened to ensure the established minimum safety standards are being met. Systems, practices and controls need to be further developed to achieve the workplace safety goals of reducing and ultimately eliminating workplace injuries and ensuring the City is in compliance with *Workplace Safety and Health Act* (the Act).

The current performance information is not adequate to monitor the City's compliance with the *Workplace Safety and Health Act* and effectiveness of the organizational and departmental safety programs. The current reporting primarily focuses on Loss Time Injuries, which is only a small component of a workplace safety program. In order to properly monitor the progress and effectiveness of a safety program the performance information reported should include the number of near misses, the percentage of corrective actions that have been implemented and the level of compliance with training standards (i.e. percentage of Safety Committee members that meet minimum training requirements). In order ensure the integrity of this information the current performance management systems need to be further developed to ensure information collected and reported is complete, relevant, accurate, and meaningful. This will assist in the ongoing and proactive management of a workplace safety program at both the organization and department level and monitoring of the City's progress towards meeting the minimum safety standards.

## MANDATE OF THE CITY AUDITOR

The City Auditor is a statutory officer appointed by City Council under *The City of Winnipeg Charter*. The City Auditor reports to Council through the Audit Committee (the Executive Policy Committee) and is independent of the City's Public Service. The City Auditor conducts examinations of the operations of the City and its affiliated bodies to assist Council in its governance role of ensuring the Public Service's accountability for the quality of stewardship over public funds and for the achievement of value for money in City operations. Once an audit report has been communicated to Council, it becomes a public document.

## AUDIT BACKGROUND

In 2012, safety incidents accounted for 103,790 lost hours and $9.0 million in workers compensation related costs. While the City has experienced stable Loss Time Injury (LTI) statistics for the past five years, the City's LTI is significantly higher than the provincial average and the province's LTI has been on a decreasing trend. These factors prompted the Director of Corporate Support Services to request an audit of workplace safety. An audit of the workplace safety program was added to the City Auditor's *Audit Plan 2011-2014* in 2012 and was endorsed by Audit Committee.

## AUDIT OBJECTIVES

The objectives of this audit were:

1. To determine the effectiveness and efficiency of the workplace safety program at the organizational and departmental level.

2. To determine the adequacy and completeness of the workplace safety performance information.

## AUDIT APPROACH

We conducted the audit in accordance with generally accepted auditing standards. **Appendix 1** provides a flowchart of the audit process.

- We conducted interviews with staff from the Organizational Safety and Occupational Hygiene Branch of Corporate Support Services, Corporate Support Services, Community Services, Fire Paramedic Service, Planning, Property and Development, Public Works, Water and Waste, Winnipeg Fleet Management Agency, Winnipeg Police Service and Winnipeg Transit to gain an understanding of the general workplace safety awareness and practices throughout the City. We modeled our questions after the *Safety and Health Program Assessment Tool,* which is provided by the Province of Manitoba and designed as a model for employers to self-assess their workplace safety programs against what is required in the *Workplace Safety and Health Act*.
- We reviewed the *Province of Manitoba Workplace Safety and Health Act* (the Act) to gain an understanding of what the standards are for a workplace safety program to be in compliance with the Act.
- We reviewed the *Administrative Standard HR–010 Organizational Safety Governance*, *Administrative Standard HR-006 Safety, Health, and Organizational Wellness* and the *Organizational Safety Code* to gain an understanding of the governance structure and respective responsibilities and authorities of key City staff with respect to workplace safety.
- We reviewed and tested a sample of incidents reported through PeopleSoft and reviewed the related employee files to ensure sufficient documentation was on file to demonstrate the requirements of an effective workplace safety program.

- We reviewed statistical information and performance reports regarding workplace safety both at the departmental level and the City level to assess if the information available accurate, complete, timely and sufficient to effectively and efficiently manage the workplace safety program and provide the necessary oversight.

Our conclusions are based upon information available at the time of the report. In the event that significant information is brought to our attention after completion of the audit, we reserve the right to amend the conclusions reached.

## INDEPENDENCE

The team members selected for the audit did not have any conflicts of interest related to the subject matter of the audit.

## AUDIT SCOPE

Our audit is limited to the statistics, transactions, policies, procedures, manuals, bylaws, and legislation related to workplace safety from the period of 2008 to 2012. Our focus is on the review of workplace safety processes and practices currently in place in major departments and at the organizational level and the assessment of the progress of planned workplace safety initiatives. The City has other initiatives, such as Alcohol and Drug Free Workplace, Respectful Workplace and Employee Assistance Plan that target workplace health that were not included in the scope of this review.

## AUDIT CONCLUSIONS

The audit work performed led us to the following conclusions:

Overall, The City provides some useful standards, protocols and procedures at both the organizational and departmental levels, but there are opportunities to improve. Established standards and procedures need to be better communicated through the development of a set of minimum acceptable safety standards. The oversight role, at both the organizational and departmental level, also needs to be strengthened. Systems, practices and controls need to be further developed to achieve the workplace safety goals of reducing and ultimately eliminating workplace injuries and ensuring the City is in compliance with *Workplace Safety and Health Act.*

The current performance information is not adequate to monitor the City's compliance with the *Workplace Safety and Health Act* or the effectiveness of the organizational and departmental safety programs. The performance information that is being collected and reported to senior management is primarily Loss Time Injury statistics which presents a limited view of the workplace safety program. Additional performance information, such as the number of all safety incidents including near misses, the number of corrective actions implemented and the level of compliance with training standards needs to be collected and reported to the right people at the right time to properly manage the workplace safety program. The current safety performance management systems need to be further developed to ensure information collected and reported is complete, relevant, accurate, and meaningful to assist in the ongoing and proactive management of a workplace safety program at both the organization and department level.

## ACKNOWLEDGEMENT

The Audit Department wants to extend its appreciation to all of the City departments who participated in this audit and especially to the Organizational Safety and Occupational Hygiene Branch of the Corporate Support Services Department's staff for their time and cooperation. We would also like to acknowledge all the dedicated and enthusiastic safety personnel at the organization and department level who participated in this audit. Their commitment to continuously improving workplace safety was evident throughout the audit.

**The Audit Team**

Bryan Mansky, MBA, CMA, CIA
Deputy City Auditor

Jason Egert, CA,CIA
Project Leader

Larissa Klimchak, CMA, CIA
Auditor

Donovan Fontaine, CA, CIA
Auditor



Brian Whiteside, CA, CIA
City Auditor

November, 2013
Date

## BACKGROUND

In 2009, the CAO at the time gave clear direction to focus on reducing Loss Time Injuries (LTI) by 25%. The decrease has not occurred despite the City's efforts to address this issue. In 2012, safety related incidents accounted for 103,790 hours lost and $9.0 million in Workers Compensation related costs a 32% increase in costs in one year.

The *Workplace Safety and Health Act* (the Act) is the Provincial legislation that governs the City's workplace safety program which outlines clear criteria on what is expected of a workplace safety program. The Province provides guidance and tools to assist employers in establishing robust safety programs through their Safe Work website and supporting materials. The Province ensures all employers operate within the guidance set by the *Workplace Safety and Health Act* by monitoring compliance and imposing fines where organizations are found to have significant deficiencies.

The general objective of the *Workplace Safety and Health Act* is to protect workers, self-employed persons and others from risks to their safety, health and welfare arising out of, or in connection with, activities in their workplaces. Employers must provide safe equipment, a safe working environment, adequate supervision, information and training. Managers, supervisors and workers have a responsibility to help the employer carry out these responsibilities.

Since employers have the greatest degree of control over the workplace, they also have the greatest degree of legal responsibility for safety and health. In 2004, Bill C-45 made it possible to hold employers and their leaders (which includes anyone who is in charge of other employees) criminally negligent.

To address the requirements of the *Workplace Safety and Health Act* and to ensure the City is in fact a safe place to work, the City has established a workplace safety program at both the organizational level and the departmental level. The City's safety statement emphasizes that safety is a top priority and requires active participation from everyone. The City's ultimate goal is "A workplace free of accidents, injuries and occupational illness."

The Corporate Support Services Department established Administrative Standard HR-010 which outlines the organizational safety governance model at the City. The *Organizational Safety Code of Practice* provides more detailed guidance on roles and responsibilities for all employees, as well as high level procedures for raising safety concerns, reporting incidents and addressing unsafe acts. The organization has also established City-wide protocols in key safety program areas, such as workplace incidents, workplace inspections, contractor safety and chemical safety. Each department has supplemented these documents with their own procedures and practices. The majority of these are in the form of site specific risk assessments, job hazard analysis and safe work procedures. These provide workers with instruction on how to perform their duties or handle hazardous material in a safe manner.

## KEY RISKS

The *potential* key risks associated with Workplace Safety include:

Compliance
- Non-compliance with the *Workplace Safety and Health Act (MB)*
- Non–compliance with the *Workers Compensation Board Act*
- Non-compliance with Union Agreements

Organizational Culture
- Lack of policies and guidelines to properly direct workplace safety
- Lack of clear accountability/responsibility
- Workplace safety not taken seriously
- Unsafe work practices encouraged to save time/ money

Business Process
- Not proactive in addressing workplace safety issues
- Lack of central coordination of workplace safety issues

Human Resources
- Insufficient staff
- Inadequately trained staff

Financial Resources
- Inadequate funding to adequately address workplace safety issues

Information Resources
- Insufficient performance information to be able to effectively manage the workplace safety processes

Physical Assets
- Improper equipment

The above noted potential risks and the processes in place to manage them were considered during the conduct of our audit.

## PERFORMANCE ANALYSIS

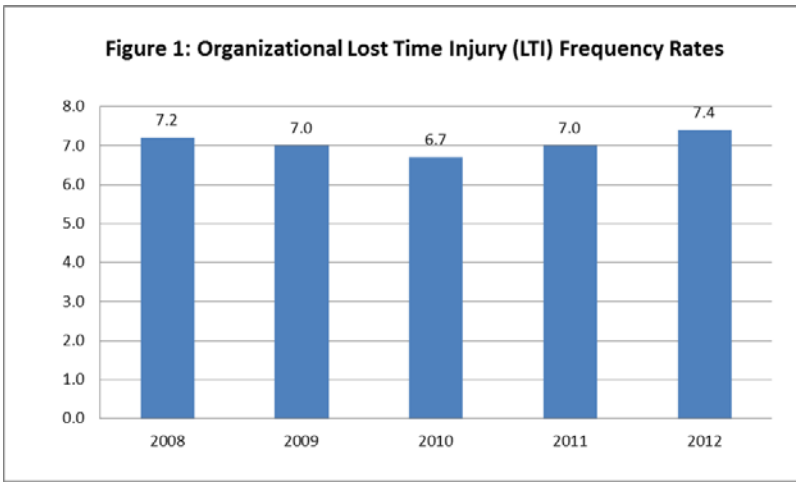
Performance information provides the foundation to understand if the systems and processes are functioning as intended and achieving the desired results. A safety performance information system should provide senior management with a comprehensive overview of the City's safety program. It should also provide departmental safety resources with information specific to their department to assist in identifying where systems are working well and areas for further evaluation.

The workplace safety information that is prepared and presented annually to the City's senior management team in the Organizational Safety Performance Report is primarily loss time injury statistics. Departmentally, the safety performance information varies greatly in terms of comprehensiveness and the level of detail and analysis performed on the information.

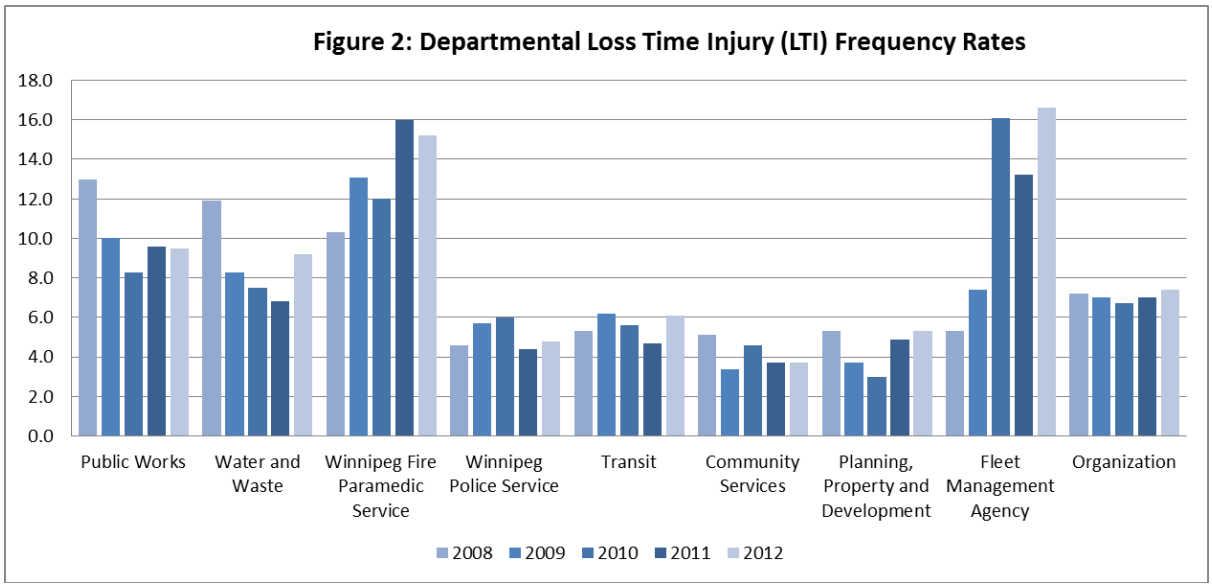
The following section will provide an overview of the performance information that we were able to obtain on a city-wide basis. We further discuss the need for a comprehensive set of performance measures in the Observations & Recommendation section of the report.

**Loss Time Injury (LTI) Frequency**

LTI frequency is the number of lost time injuries per 100 workers per year. It can be used as an internal benchmark to determine if progress has been made within an organization to reduce the occurrence of injuries. Figure 1 illustrates that the City's LTI frequency was 7.4 in 2012 (5.3 as calculated by Workers Compensation Board[1]) and has been relatively stable over the period from 2008 to 2012. The City's target in 2010 was a 25% reduction in LTI and despite increased efforts and the implementation of departmental injury reduction plans, the City has not seen a decrease in this indicator. This is in contrast to the LTI frequency rate for the Province of Manitoba (3.3) as calculated by Workers Compensation Board[1] which was significantly (38%) lower and on a decreasing trend.




In Figure 2, the City's LTI frequency statistics are further broken down by department. The LTI frequency has fluctuated over this period for most departments.

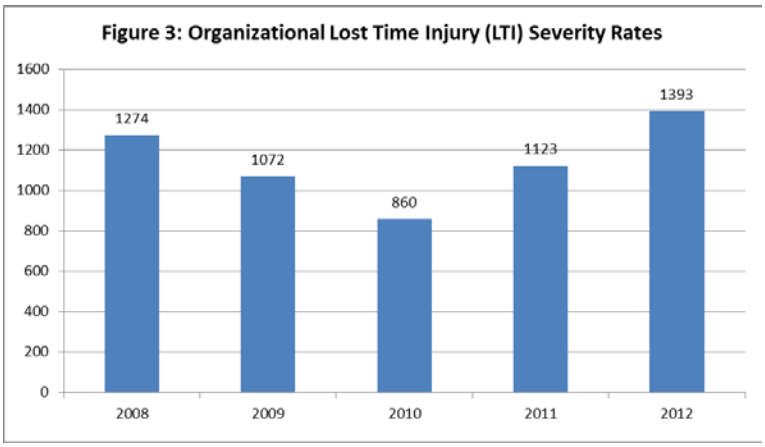



Note: only includes departments with LTI Frequency consistently greater than zero.
Note: Organization refers to City of Winnipeg Average

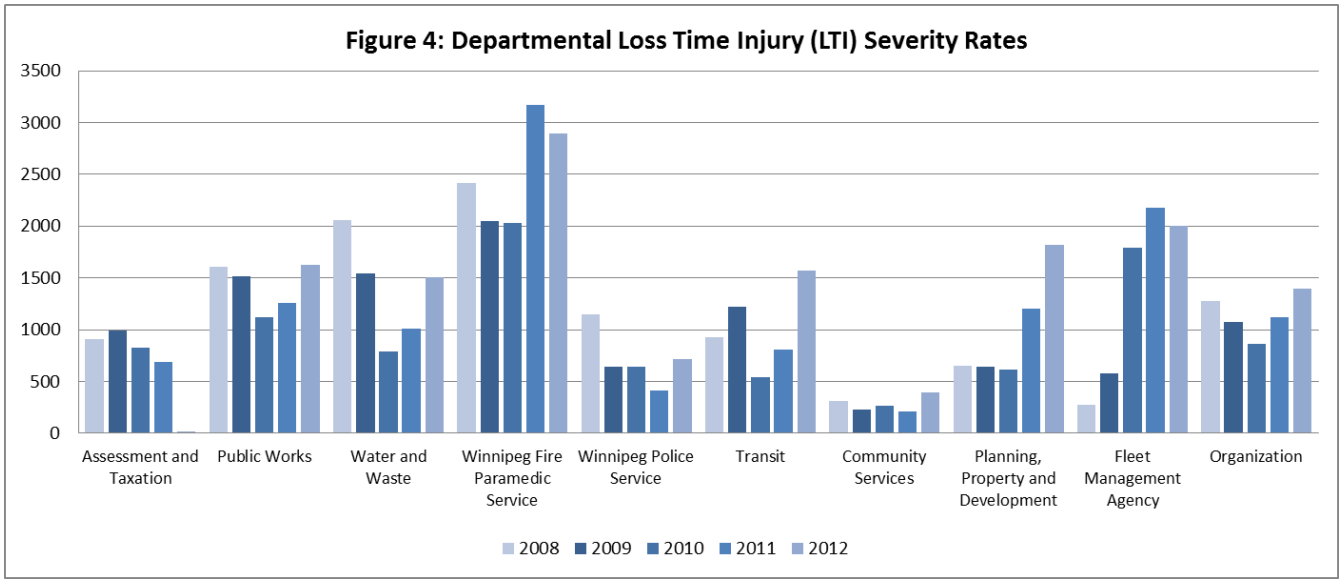
[1] Workers Compensation Board (WCB) uses gross payroll information to calculate LTI which includes periods when an employee is not present in the workplace (i.e. vacation, sick time, etc.). The City does not include this in their LTI calculations to improve the accuracy.

## LTI Severity

LTI severity reflects the seriousness of an injury and also the effectiveness of return to work and disability management programs. Severity is measured as hours lost due to injury per 100 workers per year and includes any hours lost in a given year regardless of the year of injury. The City experienced an increase of 24% in 2012 compared to 2011, which followed a 30% increase in 2011. Prior to 2011, the City had been trending downwards (Figure 3). Taken together the LTI Frequency and Severity is highlighting that even though the number of injuries is relatively stable, in 2011 and 2012 these injuries resulted in longer absences from the workplace. This translates into higher costs to the City in both lost time and higher rehabilitative costs.




This was broken down further by department in Figure 4. Similar to the LTI frequency data, the LTI severity has fluctuated for every department. In total, 103,790 hours have been lost to injuries in 2012, which translates to 49.9 full time staff (based on a 40 hour work week). Clearly this is a significant issue for the City and must be addressed.

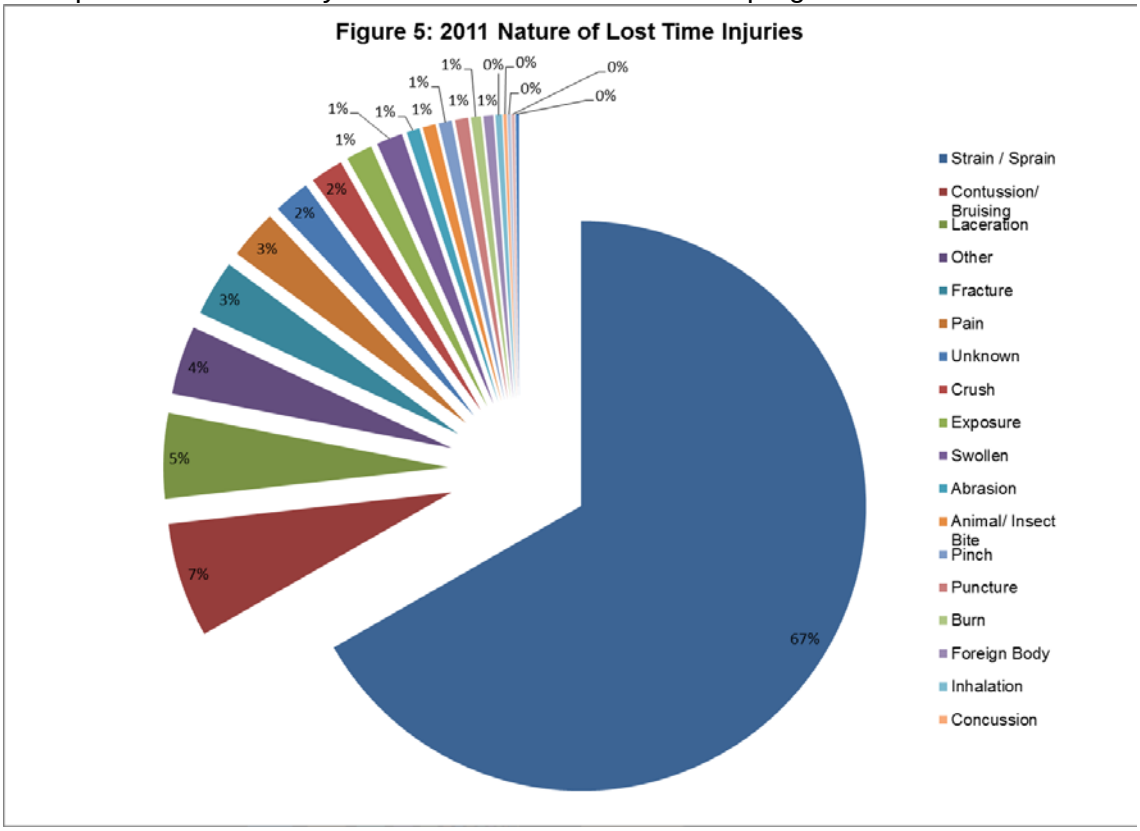



Note: only includes departments with LTI Severity consistently greater than zero.
Note: Organization refers to City of Winnipeg Average

## Nature of Injury

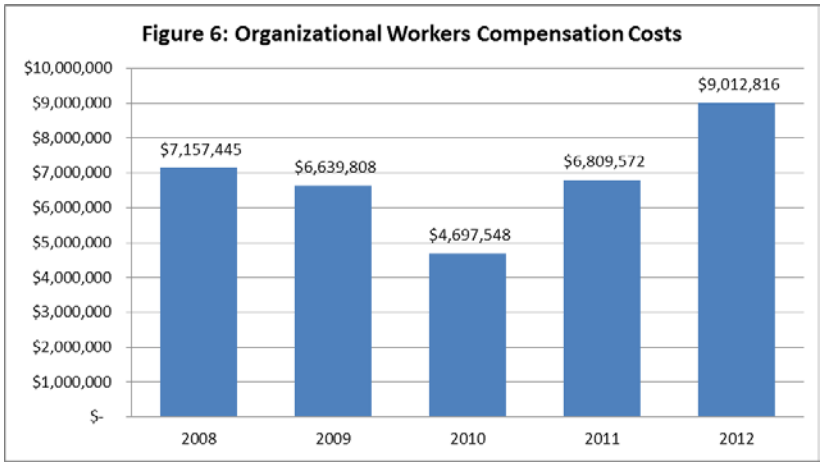
In addition to the LTI data, both at the organization level and the department level incidents are analyzed by the nature of injury. This helps identify what are the most frequent types of injuries that are causing LTIs. This information enables departments to focus their efforts on areas of concern and allows the Organizational Safety Branch to monitor trends across the City. As Figure 5 illustrates the most predominant injury that led to time loss in 2011 was strains and sprains, accounting for 67% of all

loss time injuries. To address this issue the Organizational Safety Branch, with input from the departments, initiated a project (Body@Work) in May of 2012 in partnership with the WCB. The goal of the project is to reduce workers' compensation claims and extended absences associated with strains and sprains. It is too early to evaluate the success of this program.




**Workers Compensation Costs**

The comprehensive cost of workplace safety related incidents is currently not being tracked or reported. Workers Compensations Board (WCB) related costs, such as compensation for direct hours lost, rehabilitation costs, WCB claim administration costs are tracked by the Workers Compensation Branch, Risk Management Division of the Corporate Finance Department. Figure 6 shows that WCB related costs have increased from $6.8 million in 2011 to $9.0 million in 2012, an increase of 32%. This is due to the increased cost of rehabilitation and increases in salary related expenses. The WCB figure only represents the basic costs associated directly with the claim and does not include costs such as wages to backfill the position, if necessary, or reduced productivity once the person returns to work. Although the City does not have a complete cost figure, the WCB



costs are already significant and trending in the wrong direction highlighting the need for the City to take proactive measures to reduce safety related incidents in the workplace.

## OBSERVATIONS AND RECOMMENDATIONS

A complete summary of the recommendations is attached as **Appendix 2.**

### *GOVERNANCE STRUCTURE*

*Administrative Standard HR-010 Organizational Safety Governance's* (Administrative Standard HR-010) purpose is to ensure workplace safety is managed at the highest levels within the City and establishes the structure for strategic decision-making and direction setting for safety at the City.

*The* Administrative Standard HR-010 clearly outlines the roles and responsibilities of all levels, from the Chief Administrative Officer (CAO) to Departmental Safety Resources. It also states that it is to align with *Administrative Standard IS-001 Governance Structure – Internal Services*[1] which in part outlines the key roles and responsibilities and authorities within Human Resources which is where Workplace Safety reports to in all but a few departments[2]. Under the current structure the Human Resource Leaders have a dual reporting relationship; they have a solid line relationship to the Director of Corporate Support Services (Director of CSS) and a dotted line to the Director of the department where they provide service.

The CAO assumes overall responsibility for safety within the organization under the Administrative Standard HR-010. The Chief Operating Officer (COO) holds the Director of CSS accountable for organizational safety initiatives and Departmental Directors are accountable for the implementation of safety programs within their department. In order to assist the Director of Corporate Services in fulfilling their responsibilities, the Organizational Safety and Occupational Hygiene Branch (Organizational Safety Branch) and the Departmental Human Resources Leaders provide the Director of CSS with information required to evaluate the progress of organizational safety initiatives. The departmental Human Resource Leaders are supported by the Departmental Safety Resources in the fulfillment of their responsibilities.

From a governance perspective the City has guidance in place that is consistent with the requirements stated under the *Workplace Safety and Health Act* (the Act). The Administrative Standard HR-010 provides guidance with respect to the responsibilities of all levels of City employees concerning workplace safety.

However, from our interviews it appears that even though the responsibilities of all levels of City employees have been defined in the Administrative Standard HR-010, some responsibilities have not been consistently interpreted. In particular, there exists some misunderstanding of what is a "must do" versus a "may do" with respect to implementing corporate initiatives, in particular around oversight practices. We believe these misunderstandings are in part due to a need to better define expectations for the oversight role through the development of a more comprehensive set of minimum safety standards, which will be discussed in more depth in the Minimum Acceptable Safety Standards section

[1] Service Level Agreement for internal services has not been developed for the Winnipeg Police Service. WPS Human Resource Leader has an indirect (i.e. dotted line) reporting relationship to the Director of CSS.

[2] Fire Paramedic Service and Fleet Management Services report internally within their department

of the report. We believe a renewed communication effort will address any current misunderstandings and ensure all roles and responsibilities are clearly understood moving forward. The role of the corporate group is to lead, coordinate and/or facilitate organizational safety initiatives that affect multiple departments to monitor compliance with the Act. The role of human resource leaders and departmental safety staff is to ensure those initiatives are effectively and efficiently implemented to maintain compliance but also to reflect the unique operations performed by different departments. As the governance model for safety is communicated to departments it may be necessary for refinements to be made to the current Administrative Standard HR-010 to address any misunderstandings that may be highlighted during this outreach to organizational and departmental leaders.

***Recommendation 1***
Director of CSS should ensure Administrative Standard HR-010 is re-communicated to all organization and departmental leaders with emphasis on the respective roles and responsibilities and further defining the expectations for oversight.

***Management Response***
Agree. To ensure consistent interpretation of responsibilities as outlined in Administrative Standard HR-010, expectations for oversight must be clarified. This can be accomplished through establishment and communication of minimum standards for safety performance measurement and reporting (see response to Recommendation #2). Timeline: Second quarter 2014

## *MINIMUM ACCEPTABLE SAFETY STANDARDS*

Setting minimum safety standards is essential to building a safe work environment. Standards help to build a positive culture, control the risks and set out how City employees will perform their work. They should identify who does what, when and the expected result.[1] Standards must be: measurable, achievable and realistic.

Administrative Standard HR-010 identifies the Director of CSS as being accountable for organizational safety initiatives and to approve the implementation of any necessary changes in overall direction, plans and/or standards as they relate to organizational safety. We interpret this to mean that the Director of Corporate Support Services has the responsibility to monitor the City's compliance with the *Workplace Safety and Health Act*. This translates into identifying minimum acceptable safety standards for the performance of work, some of which have already been developed and others that still need to be developed.

The following standard practices have been adopted at the organizational level:

- How to raise safety concerns
- Escalation of safety concerns
- Reporting an incident or injury
- Incident investigation
- Safety inspections
- Contractor safety procedures
- Chemical safety
- Job Hazard Analysis and Safe Work Procedures

[1] Managing Health and Safety: Five Steps to Success, Health and Safety Executive, Government of UK

The following standard practices need to be developed the organizational level:

- Training for supervisory staff
- Safety Orientations/ Job Related Training
- Qualifications for safety resources
- Qualifications for safety committees
- Monitoring compliance
- Performance reporting
- Review of safety program

These safety standards should be consistently documented, clearly communicated and implemented in all departments. The progress towards the full implementation of these standards should be periodically monitored by the Organizational Safety and Occupational Hygiene Branch and reported to the Director of Corporate Support Services.

Through our audit work we identified differing practices and standards with respect to safety programs in the departments. From a perspective of minimum safety standards, there should be no deviation. If a department chooses to exceed minimum standard, they may do so if the departmental director is supportive. Once the minimum safety standards are communicated to the departments and implemented, then the Organizational Safety and Occupational Hygiene Branch will be able to compile complete, accurate, timely and comparable safety information and fulfill its oversight role.

***Recommendation 2***

Director of CSS establish a more comprehensive set of minimum safety standards for the organizational safety program to be implemented in all departments to monitor compliance with the *Workplace Safety and Health Act*.

***Management Response***

Agree. For a safety program to be effective and to provide reasonable assurance that safety risk is mitigated, minimum standards must be developed and implemented.

Under the direction of the Director of Corporate Support Services, the Organizational Safety and Occupational Hygiene Branch will:

- develop and implement an organizational protocol outlining minimum safety performance measurement and reporting requirements. The protocol will define key safety performance measures for the City; outline how data is to be collected and reported at all levels, and strengthen safety program oversight. Timeline: Second quarter 2014
- work with departmental safety resources and HR Leaders to:
    - define minimum requirements related to the qualification and training of staff with key responsibilities under the Workplace Safety and Health Act. This would include orientation, job related training, and supervisory training, safety committee training and specific training related to the Act. These requirements will be communicated to the organization and adopted as minimum safety performance standards. Timeline: Second quarter 2015
    - establish standard criteria and methodology for safety program reviews. These requirements will be communicated to the organization and adopted as minimum safety performance standards. Timeline: End of 2015

## *OVERSIGHT ROLES*

Proper oversight at all levels of the organization is crucial to ensure the continued effectiveness of a workplace safety program at both the organizational and departmental level. In order to ensure adequate oversight is carried out, all levels of employees must clearly understand how oversight is defined and their respective roles. Oversight, for the purposes of this report refers to the monitoring of the workplace safety program at the organizational and departmental level and informing those with the authority to make necessary changes to ensure the organization and departments remain compliant with the minimum safety standards and the *Workplace Safety and Health Act*.

### Chief Administrative Officer (CAO)

Administrative Standard HR-10 states that the CAO assumes overall responsibility for safety within the organization and acts as a final decision-maker on organizational safety issues. In essence the CAO's primary oversight responsibility would be to ensure that sufficient information is being presented in a timely manner in order to make informed decisions with respect to the workplace safety program.

### Chief Operating Officer (COO)

Administrative Standard HR-010 is clear on the role of the COO. It states the following:

- Holds department heads accountable for safety in departments by monitoring performance and progress of departmental safety programs on a regular basis.
- Holds the Director of Corporate Support Services accountable for organizational safety initiatives by monitoring their progress on a regular basis.
- Directs and approves the implementation of any necessary changes in overall direction, plans and/or standards as they relate to organizational safety.

The COO has a very active oversight role in terms of monitoring the department heads and the Director of CSS with respect to the performance and progress of safety programs and initiatives. It is crucial that the COO receives and reviews a complete set of workplace safety performance information at the organizational and departmental level on a timely basis.

### Director of Corporate Support Services

Administrative Standard HR-010 defines the Director of CSS's role as follows:

- Acts as a senior advisor to the CAO, recommending systems and administrative standards that ensure integrity and consistency in organizational safety.
- Assumes responsibility for organizational safety initiatives and provides strategic leadership in alignment with legislated requirements.
- Receives information on emerging trends and internal/external risks.
- Supports and/or endorses changes to direction, systems and processes as required.
- Ensures safety is included in the agenda of senior management team meetings as required.

By acting as the CAO's senior advisor the Director of CSS is responsible for ensuring the CAO has the appropriate information to assess the performance of the workplace safety program at the organizational level. The Director of CSS also has to be kept current on emerging trends and internal and external risks.

## Department Head

Administrative Standard HR-010 defines the role of the department heads as follows:

- Assumes responsibility for safety within their department and acts as senior decision maker on departmental issues.
- Holds managers, supervisor and employees accountable for safety by monitoring performance and progress on a regular basis and progress on a regular basis.
- Evaluates departmental progress and performance, and reports results and departmental safety priorities to the CAO on a regular basis.

The department head has a key oversight role as they are responsible for monitoring the performance and progress of the departmental safety program and reporting these results to the CAO on a timely basis.

## Organizational Safety and Occupational Hygiene Branch (of CSS)

The Organizational Safety and Occupational Hygiene Branch (of CSS) (Organizational Safety Branch) is the group tasked to support the Director of CSS in ensuring organizational safety initiatives are in alignment with legislated requirements. Administrative Standard HR-010 defines the roles and responsibilities of the Organizational Safety Branch as the following:

- Provides strategic and timely information, advice and support to the City's administration on safety issues that affect the organization;
- Recommends to the Director of CSS changes in direction, systems or processes;
- Recommends organizational safety protocols, systems and services;
- Reviews and reports to the Director of CSS and respective department heads on the progress of organizational safety initiatives and safety trends across the organization; and
- Leads, coordinates and/or facilitates organizational safety initiatives that affect multiple departments.

To fulfill this broad mandate, the Organizational Safety Branch facilitates monthly meetings with all departmental safety resources to identify safety issues impacting multiple departments and develops City-wide solutions. Working with the safety community, the Organizational Safety Branch has led the development and implementation of a number of City-wide standards, protocols and procedures. They are also coordinating and leading corporate-wide safety initiatives such as Body@Work (project to prevent strains and sprains), and an on-line workplace inspection system to track and pro-actively report on the correction of hazards. The Organizational Safety Branch develops and communicates an annual Organizational Safety Performance Report for the CAO, and meets with senior management annually to discuss trends and recommend direction. The Organizational Safety Branch maintains a safety site on CityNet which includes guidance and tools for departments to use for their safety programs and assumes primary responsibility for the maintenance of the central Online Material Safety Data Sheets System that is accessible to all departments. Finally, the Organizational Safety Branch works with the Employee Development Branch to deliver safety related training for safety committees and employees.

Through our interviews it was evident that staff in all departments, both safety and operational, embraced the Organizational Safety Branch's current role. However, as was noted previously there is an opportunity to improve the oversight of the organizational safety program to monitor all departments' compliance with the minimum standards which are in alignment with the requirements of the Act. We

found that that the Organizational Safety Branch is viewed as a resource to offer support and guidance. While these roles are important to foster a collaborative environment the departments also need to understand that the Organizational Safety Branch does have an oversight role and is accountable to the Director of CSS for ensuring safety programs are in alignment with legislated requirements.

Over the last couple years the Organizational Safety Branch has begun to lay the groundwork for a good governance model but needs to build on past efforts. The Organizational Safety Branch needs to take the lead role in monitoring all departments' compliance with minimum acceptable safety standards. These oversight responsibilities would include identification of organizational minimum safety standards, working collaboratively with departments on design of supporting systems and then monitoring and reporting on a comprehensive set of performance information that would highlight the progress of organizational safety initiatives and safety trends across the organization.

***Recommendation 3***
Director of CSS should ensure the Organizational Safety and Occupational Hygiene Branch perform the expanded oversight responsibilities as defined in Administrative Standard HR-010.

***Management Response***
Agree. The role of the Organizational Safety and Occupational Hygiene Branch will be expanded, within the safety performance measurement and reporting framework (established in response to Recommendation #2), to include additional oversight of departmental safety activity.
Timeline: Second quarter 2014

## Human Resource Leaders

Human resource leaders are the Director of Corporate Support Services' direct link to the departments as outlined in the *Administrative Standard IS-001 – Internal Services* and as such are the direct link to the departmental safety programs with the exception of Fleet Management Agency, Winnipeg Fire Paramedic Service and Winnipeg Police Service as they have a different reporting structure. The Administrative Standard HR-010 identifies two key responsibilities for human resource leaders related to the oversight of the safety program:

- Implements, communicates and supports organizational and departmental safety standards, protocols, systems, processes and activities within their department.
- Provides the Director of Corporate Support Services with information required to evaluate the progress of organizational safety initiatives.

Through our interviews, we found that although the human resource leaders are providing the Director of CSS with high level information they are not providing a comprehensive set of information to properly evaluate the progress of organizational safety initiatives. We found that this was in part due to a lack of understanding of the minimum reporting requirements and the absence of a comprehensive set of minimum safety standards. We believe that with the establishment of a comprehensive set of minimum safety standards, minimum reporting standards and an effort to communicate these to all departments the human resource leaders will be in a position to better fulfill their role under Administrative Standard HR-010.

## Departmental Safety Resources

Departmental safety resources are responsible for collecting, analyzing and reporting on the necessary performance data to demonstrate the department is complying with established standards. Departmental safety resources report to the departmental human resource leader and/or the department head and as such are responsible for providing them with the necessary information for them to carry out their oversight roles. The Administrative Standard HR-010 identifies two key responsibilities for departmental safety resources that are related to oversight:

- Provides safety advice and support to all members of their department including managers, workers and safety committee members.
- Identifies and responds to emerging trends and internal/external risks specific to a department and develops processes and systems to respond to the issue.

Through our interviews, we found that some departmental safety resources do not believe they have a direct responsibility for ensuring compliance with the Act and act more as an advisor to department staff. They believe ensuring compliance is the specific role of supervisors and managers. Most departmental safety resources are currently providing limited performance information to supervisors to support them in carrying out their responsibilities. Where the supervisor has responsibility to ensure the local work environment is safe, the departmental safety resource has the responsibility to monitor safety trends across their department and use their safety expertise to support supervisors. Departmental safety resources have more safety related knowledge and experience than a typical supervisor and that should be used on a regular basis to support supervisors in identifying and addressing any potential safety concerns before they result in an incident. Departmental safety resources should also be providing regular detailed reporting to supervisors and work with them to identify any emerging trends. Departmental safety resources play a vital role in ensuring the leaders of the department are provided with the necessary information to effectively carry out their oversight roles and in supporting overall department compliance with the Workplace Safety & Health Act.

***Recommendation 4***

Director of CSS to require regular reporting of safety performance information by the departmental human resource leaders to the Organizational Safety Branch. Departmental human resource leaders should work with departmental safety resources, where applicable, and their Department Heads to ensure organizational safety initiatives are implemented and performance information reported to demonstrate the departments' compliance with the *Workplace Safety and Health Act*.

***Management Response***

Agree. The safety performance measurement and reporting process developed in response to *Recommendation #2* will require the ongoing reporting of safety performance/progress information by the departments (safety resources) to the Organizational Safety and Occupational Hygiene Branch.
Timeline: Second quarter 2014

## Departmental Supervisors

The *Organizational Safety Code of Practice* (Code of Practice) is meant to supplement the Administrative Standard HR-010 and "discusses safety at a level that applies to all City of Winnipeg employees regardless of department". The Code of Practice builds on Administrative Standard HR-010 by outlining responsibilities for supervisors[1] and employees. An excerpt from the City of Winnipeg

[1] Organizational Safety Code of Practice – Supervisor is defined as anyone who directs the work of an employee

*Organizational Safety Code of Practice* under Section B – Key Roles and Responsibilities clearly outlines what is expected by a Supervisor.

> *Supervisor (Leader)*
> *Note: A supervisor (leader) is anyone who directs the work of an employee.*
> *• Ensures that workers understand safety rules and procedures and have the training and tools to complete work safely.*
> *• Monitors safety as work progresses and responds to any issues in a timely fashion.*
> *• Responds to worker concerns related to safety.*
> *• Responds to safety and health committee recommendations.*
> *• Ensures appropriate corrective action is taken to address unsafe acts.*
> *• Promotes a safe and healthy work environment that complies with regulatory requirements.*

The Code of Practice in section F – Unsafe Acts further enforces that the supervisor is responsible for addressing unsafe acts.

> *Supervisors will address unsafe acts in the workplace by*
> - *Determining why they occurred*
> - *Taking corrective action(s) to address the cause*
> - *Document the corrective action*
>
> *In many cases the unsafe acts are unintentional and provide an opportunity to coach an employee. Where circumstances warrant, unsafe acts will result in discipline.*

From our interviews it appears that even though the responsibilities of all levels of City employees have been defined in the guidance documents, in large part they have not been fully understood. We found that some employees, especially the manager and supervisory levels did not have a full understanding of what they are responsible for under the Act and what they need to do to fulfill these responsibilities.

Being a supervisor responsible for the safety of the workers under their charge is a very broad concept that has many facets such as ensuring staff receive adequate training and proper safety equipment, promoting a safe work culture and environment and having processes in place to identify and address safety concerns. From our interviews we found that supervisors understood that they were responsible for the safety of their workers in a general sense but the majority was not familiar with the training, incident investigation, oversight and enforcement requirements under the Act. We found that less than twenty-five percent of supervisors indicated they had training plans related to job safety in place for each employee beyond the apprentice or recruit training phase of the employee's career. Through our interviews we noted that less than ten percent of the workers indicated they had an individual training plan. Having a safety training plan for workers is a requirement of the Act.

We also found that supervisors were lacking training in incident investigation and implementation of corrective actions following a reported incident. Information on organization-wide reported incidents indicate that only 63% of the reported incidents had corrective actions in place and of these only 47% had been implemented. We acknowledge that more corrective actions may have been implemented and not reported but supervisors should be properly documenting all safety efforts. When these issues are combined with a lack of performance reviews and a lack of adequate performance management

information it greatly decreases the ability for supervisors to successfully advance workplace safety initiatives.

Specific responsibilities related to safety need to be communicated to supervisors and embedded in their daily job responsibilities. Only when the supervisor is fully aware and trained can they be expected to fulfill their role in creating and maintaining a safe work environment. These responsibilities would include, at a minimum:

- addressing identified safety issues within a specified time range;
- establishing a training plan related to safety for employees;
- maintaining records for incident investigations and implementing corrective actions; and
- ensuring compliance with all documented safety procedures.

***Recommendation 5***
Director of CSS ensure that the *Organizational Safety Code of Practice* be updated to include the above noted safety responsibilities for a supervisor and communicated throughout the organization.

***Management Response***
Agree. Under the direction of the Director of Corporate Support Services, the Organizational Safety and Occupational Hygiene Branch will amend the Organizational Safety Code of Practice to include additional clarification regarding a supervisor's safety responsibility.
Timeline: Second quarter 2015

## *REVIEW OF SAFETY PROGRAM*

The Workplace Safety and Health Act requires that the workplace safety program must have a procedure reviewing and revising the workplace safety and health program at intervals not less than every three years or sooner if circumstances at a workplace change in a way that poses a risk to the safety or health of workers at the workplace (Section 7.4(5)(k)). We noted that the departments have taken different approaches in addressing this requirement. Currently, three of the departments have engaged an external body to audit their safety program and the remainder of the departments are relying on a more informal internal review of their program. The primary reason cited by departments that did not have their safety program reviewed by an external body was insufficient resources, both time and financial. These reviews are time consuming and costly but we believe they provide valuable information about the performance of the workplace safety program.

We found that the internal reviews did not follow a standard program when evaluating the performance of the workplace safety programs in place at the department level and therefore make it difficult to properly monitor the progress of the respective workplace programs at both the departmental and organizational level. The Province, through the Work Safe website provides an excellent model audit program that could be adapted for the City's workplace safety program and used by those departments who choose to perform internal reviews to evaluate their respective safety program. This program could be used for both internally and externally performed reviews. This would ensure each department's safety program is evaluated using the same criteria and methodology which would assist all parties in fulfilling their oversight role. We also found there is no requirement to provide this information to Organizational Safety to assist them in fulfilling their oversight role. To ensure consistency between the departments and to assist the Director of CSS and the Department Heads fulfill their oversight roles we believe a minimum standard should be established for the review of the workplace safety program and Organizational Safety Branch should monitor compliance with this. The

establishment of a minimum safety standard and the expanded oversight role of Organizational Safety has been addressed in **Recommendation 2** and **Recommendation 3** respectively.

## *SAFETY ISSUE ESCALATION PROCEDURE*

The guidance provided in the *Organizational Safety Code of Practice*: Section D: How to Raise a Safety Concern currently does not specifically involve the departmental safety resources or the Organizational Safety Branch. Employees are directed to first raise a safety concern with their direct supervisor, if not resolved at this level then it should be directed to their departmental workplace safety and health committee. If it is still not resolved the worker is directed to raise the concern with the Workplace Safety and Health Division of Manitoba Labour and Immigration. We did note that this is consistent with the guidance provided in the *Workplace Safety and Health Act*; however, this escalation process is not consistent with the City's governance model.

Current safety training for supervisors and safety committees does encourage employees to contact their safety resource or organizational safety resource for assistance prior to contacting the Province. This should be reflected in the *Organizational Safety Code of Practice* to provide an opportunity for the Branch tasked with responsibility for safety initiatives to address the issue. Involvement at the organizational level would allow for "lessons learned" from other issues to be used to resolve this concern and also for the identification of emerging safety trends.

***Recommendation 6***

The *Organizational Safety Code of Practice* should be amended to include departmental and organizational safety resources as contacts for escalating a safety concern.

***Management Response***

Agree. Under the direction of the Director of Corporate Support Services, the Organizational Safety and Occupational Hygiene Branch will amend the Code of Practice to include safety resources as a contact for escalation of safety concerns prior to contacting the province.
Timeline – Second quarter 2015

## *POLICIES AND PROCEDURES*

Overall the City at both the organizational and departmental level has sufficient guidance to ensure they are in compliance with the following sections of the *Workplace Safety and Health Act*:

*7.4(5) A workplace safety and health program must include*

*(a) a statement of the employer's policy with respect to the protection of the safety and health of workers at the workplace;*
*(d) a statement of the responsibilities of the employer, supervisors and workers at the workplace;*
*(i) a procedure for investigating accidents, dangerous occurrences and refusals to work under section 43;*
*(j) a procedure for worker participation in workplace safety and health activities, including inspections and the investigation of accidents, dangerous occurrences and refusals to work under section 43;*

The safety guidance provided organizationally and departmentally is either provided in a hard copy form or available on the intranet for all employees to view. From our review almost all employees interviewed were aware in general of where to find this information, while some acknowledge that they do not regularly access this information. This high-level guidance forms an important component of a comprehensive safety program. We noted at both the organizational and departmental level the safety statements clearly highlight "that protecting the safety and health of all employees is a commitment of the highest priority". This message is clearly understood by staff at all levels that were interviewed. Some departments are even more definitive in their expectations that safety must be the first priority at all times. An excerpt from Public Works' Safety Statement exemplifies this "Supervisors – are responsible for developing proper attitudes towards safety in themselves and those they supervise. They must ensure operations are conducted with the utmost regard for the safety and health of all employees." An excerpt from Water and Waste's Safety Statement further exemplifies the departments and the City's commitment to safety "We will provide and maintain a safe and healthy workplace according to industry standards and the law. We will do everything we can to prevent accidents. Every task, however urgent or important, can be done safely."

The next level of guidance comes from the day-to-day procedures that deal with how to conduct a particular job or handle materials in a safe way. These procedures are discussed below and include:

- Job Hazard Analyses and Safe Work Procedures
- Workplace Hazardous Materials Information System (WHMIS)

## Job Hazard Analyses and Safe Work Procedures

The *Workplace Safety and Health Act* provides guidance on what a safety and health program must have in place. This guidance is provided in the following excerpt from the Act:

*7.4(5) A workplace safety and health program must include*

*(b) the identification of existing and potential dangers to workers at the workplace and the measures that will be taken to reduce, eliminate or control those dangers, including procedures to be followed in an emergency;*

"At the foundation of a safety and health program is a system for the recognition, evaluation and control of workplace safety & health hazards. The information created through this analysis is used by employees at all levels and is the first step in reducing the likelihood of an undesirable incident. Hazards are those factors that if not managed properly, have the ability to cause harm or damage".[1]

"A job hazard analysis (JHA) is a systematic way of analyzing a job or task in order to identify all five categories (physical, chemical, biological, psychological and ergonomic) of possible hazards and the control measures needed to manage the safety risk from those hazards. Safe work procedures (SWP) are developed using the information contained in the JHA and provide a written record of how the job is safely done and can be used as a training tool." [1]

The Organizational Safety Branch has provided the necessary guidance on the importance of and how to perform and document Job Hazard Analyses and Safe Work Procedures. They have also provided a template for creating critical inventory of hazards where the risks identified can be ranked in terms of severity and likelihood to allow departments to focus on the highest risks.

[1] City of Winnipeg, Corporate Safety Website excerpt dated May 14, 2013.

From our interviews and high level review of JHAs and SWPs we noted that all departments have JHAs and SWPs in place. Some have combined these two documents. Departments have a process in place to ensure they have completed or significantly completed all the JHAs and SWPs for their identified high and medium risks within the established guidelines of the Act. We did note that most have not completed the documents for their low risk hazards as these are usually covered by equipment training or safety talks on an informal basis. We believe this current approach is consistent with the intention and guidance provided in the Act.

City departments have employed different approaches to creating their inventory of JHAs and SWPs, which is a time consuming process. Some have contracted with external resources to complete, others placed the responsibility on a single (or few) internal resources while others widely distributed the responsibility on many internal staff that have intimate knowledge of the work processes. Distributing the effort amongst many staff does appear to achieve the greatest worker buy-in as there is value in the development process.

The Act also requires these JHAs and SWPs be reviewed and revised if necessary at least every three years. We noted that most departments only have an informal plan in place for ensuring that these JHAs and SWPs will be maintained and updated. Most Departmental Safety Resources also recognized the fact that they will likely not have sufficient resources available to them to successfully complete this three year cycle on an ongoing basis.

The oversight role of the Organizational Safety Branch will require a monitoring function to monitor the departments' compliance with this section of the Act. Advising departments on possible efficiencies such as using a risk based approach to creating and maintaining the documents with a mind to consolidating where feasible would be a value added service to provide, as time permits.

## Workplace Hazardous Materials Information System (WHMIS)

The Online Material Safety Data Sheet (MSDS) is a critical component of WHMIS to ensure hazardous materials are handled in a safe manner at the City and is maintained primarily by the Organizational Safety Branch. When a department identifies a new chemical or a change in a products composition, the Organizational Safety Branch is provided with an MSDS to add to the online system. The online system provides services like MSDS revision, update acquisition and data indexation. The Organizational Safety Branch also has a *Chemical and Biological Substances Protocol* and a *Chemical Biological Substance Safety Guide* that guides workers and supervisors through the process of site specific evaluations and provides a listing of resources to assist in the performance of their responsibilities in this area. Through our review we noted that the MSDS database is largely kept up to date as new products are introduced. The Organizational Safety Branch monitors the queue for newly created MSDS and as of May 2013, only 5 where pending out of a total of 2,660.

The establishment of minimum safety standards for Job Hazard Analyses, Safe Work Procedures and MSDS reporting has been addressed in **Recommendation 2**.

## *TRAINING*

Adequate and appropriate workplace safety training is vital to the success of a workplace safety program. Under Section 4(2) parts (b) and (c) of the Act it specifies the employer is responsible for ensuring their employees are provided with adequate information, instruction and training to ensure their workers safety in the workplace. Given that training is the cornerstone of an effective workplace safety program we looked at training at several stages and over a wide range of responsibilities including: orientation, job related training, supervisory training, safety committee training and specific training related to the Act. We have noted several areas in the following sections where the Organizational Safety Branch should set minimum standards.

### Orientation

We found that all departments have a staff orientation program in place that informs newly hired workers of the workplace safety and health guidance in effect at their workplace and their rights under the Act. This does serve as an excellent starting point in making a new employee aware that safety is taken seriously by the department, that procedures and practices are in place to ensure a safe workplace, how to bring forward a safety concern and their rights under the *Workplace Safety and Health Act*. In the larger departments this orientation usually occurs at least once a year, whereas in the smaller departments, due to the limited number of new hires this may only occur every few years. Ideally, and in accordance with the Act this orientation should occur as close to the date of hire as possible. We suggest that, particularly the smaller departments ensure that all new employees receive at least a safety orientation prior to starting their new duties. This orientation could be as simple as a few handouts, an employee handbook or a meeting with the safety resource. The Organizational Safety Branch should promote this practice as the minimum standard for organizational safety.

### Job Related Training

The priority in workplace safety is ensuring workers have the necessary training to perform their jobs safely. We found in general processes are in place and working reasonably throughout the City departments to ensure that line workers are provided with the necessary training on the equipment and the jobs they are to perform prior to actually performing the work. The City's public safety related services, Police, Fire and EMS have very good systems in place to ensure that their workers have the necessary information, instruction and training to perform their duties safely both in terms of their personal safety and the public at large. Other departments with skilled trades have apprenticeship and/or mentorship programs, with the former typically being more structured (i.e. mechanics, carpenters, electricians, plumbers). These ensure the employees have the necessary training to perform their duties safely. From our interviews we noted that both in-house and externally provided training does have a safety component.

However, we did note a few areas of concern regarding job related training. First, some of the training received on equipment operation is not directly transferrable when an employee transfers between divisions even within the same department. The employee may be "qualified" on paper but lacks the practical knowledge of operating the piece of equipment in a different environment which could lead to an employee operating the equipment in an unsafe manner. To mitigate this we noted that a few areas of the City have informal safety meetings prior to starting projects where the safe operation of the equipment to be used is reviewed prior to the start of any work. In addition, less experienced staff should work under the supervision of more experienced staff, where practical.

Second, the timing of the training is not always appropriate. This is especially evident in the spring when all the seasonal staff are hired or re-hired. Given the large number of staff that are hired on a seasonal basis it would be most effective to offer training directly before their seasonal term starts. Currently, some departments try to train seasonal staff throughout the busy season which increases the risk of employees performing tasks and operating equipment they are not adequately trained on and therefore increasing theirs and others exposure to workplace safety incidents. The Organizational Safety Branch should promote minimum standards for job related training.

## Supervisor Training

We found that virtually all supervisors we interviewed possessed the fundamental understanding that they are responsible for the safety of their employees and how to report an incident. Beyond communicating that basic understanding we noted the training of supervisors was not consistent. It is critical supervisors are provided with the training necessary to ensure they have an understanding of what their responsibilities are under the Act and how to properly investigate an incident and provide an effective corrective action to prevent an incident from reoccurring. Ideally, this training should be included in the qualifications of the position, to ensure the employee possesses this knowledge prior to being placed in a supervisory position.

Corporate Education offers many safety related courses. In addition to the Foremanship series of courses Corporate Education offers Investigating Workplace Incidents and Safety Responsibilities for Supervisors courses, both of which relate directly to the Act. For the 2011/2012 course year, each course was offered five times and in almost all classes there were vacant spots. These two courses had a vacancy rate of 22% and 33% respectively. The issue does not appear to be the availability of the course but instead the willingness to send supervisors or the willingness of supervisors to sign up for these courses.

This is due in part to the fact that we noted that these courses are not required courses for all supervisors in the City. Corporate Education's foremanship series of courses do cover the necessary aspects of safety. A review of the 2010-2012 job postings indicates that the completion of these foremanship courses is increasingly becoming a required qualification for foreman and supervisory positions. The Organizational Safety Branch should promote this practice as the minimum standard for organizational safety as supervisors are critical to the success of any workplace safety program.

## Safety Committee Training

The Safety Committee is a vital link between the workers and management in addressing workplace safety issues in addition to helping ensure a safe workplace. The Act requires that the Safety Committee be comprised of at least fifty percent workers and the remainder can be management. Worker representative selection is governed by their respective collective agreements, where applicable and management representatives are typically appointed. According to the Act, safety committee members are responsible for participating in workplace inspections and incident investigations among many other duties. The ability of committee members to effectively perform their role is dependent on their understanding of the Act and their level of training in their duties as safety committee members. We found that despite this, departmental safety committee members are not required to have the safety committee training that is offered by both the Province and the City. In some instances it is in the Terms of Reference for the Safety Committee but it is still not a required qualification prior to being selected. In our discussions with departmental safety officers they indicated that they advise safety committee members of the available courses and recommend that they attend them but ultimately it is their choice.

Participation on a departmental safety committee should be viewed as a serious commitment from the individual. We observed that the participation rate for the Workplace Safety Committee Training course for the safety committee members in a department ranged from 0% to 71%. This would appear that certain members do not view the safety committee as a serious obligation. Members of the safety committee are often seen as a primary safety resource for the departmental staff and are a vital link in a more proactive approach towards workplace safety. We would not expect a new employee to perform a job without the proper qualifications and training and this should be no different. The Organizational Safety Branch should promote as the minimum standard for organizational safety that departmental safety committee members possess a minimum set of qualifications based upon training and experience.

## Qualifications of Departmental Safety Officers

We noted that in all departments except the Winnipeg Police Service (WPS) and the Winnipeg Fire Paramedic Service (WFPS) the safety officers are required to have training in safety from an accredited educational institution and hold a Canadian Registered Safety Professional (CRSP) designation. WFPS is currently working towards changing the job requirements for its safety officer and are planning on including safety related credentials. The WPS and their union have agreed to enable the requirement of safety credentials in the safety officer position but the change has not yet been implemented. All departments required related experience in workplace safety and health for the position. Given the importance of the Safety Officer position appropriate safety qualifications combined with related experience should be mandatory. The department safety officer is expected to be the authority on workplace safety in the department and their training and qualifications should reflect this.

## Documentation of Training

In order for supervisors to properly perform their jobs in ensuring the employees they manage are adequately informed and trained, they need a system in place that provides timely and accurate access to safety training records. This would help ensure that employees are receiving adequate training at the appropriate time and have a training plan in place for continued development. We noted that the level of documentation of employees' training varies from department to department. The Winnipeg Police Service and Winnipeg Fire and Paramedic Service have very comprehensive internally developed electronic training records. Other departments rely on a mix of spreadsheet records and PeopleSoft records with some areas still relying primarily on physical files. We noted that PeopleSoft is currently being used to track City offered courses but is not used consistently to track external courses as that information is not easily captured. This is not optimal and could lead to incomplete training information.

In addition, PeopleSoft currently is not set up to give notification of when training is scheduled to be updated (i.e. for recertification). The paramedics' training is managed by a provincial body and they are made aware of their training requirements in order to remain certified. Most departments monitor this primarily through a mix of supervisors tracking training on a spreadsheet and/or employees own monitoring. We did note that the WPS system does provide the functionality to help ensure their employees stay current with their training. The Organizational Safety Branch should identify the minimum standard for documentation of safety related training for all City departments to be in compliance with the Act. They should also explore the feasibility of implementing the WPS training recording system to leverage off the work already performed by WPS.

The establishment of minimum safety standards related to training, qualifications and documentation has been addressed in **Recommendation 2**.

## *DOCUMENTATION OF COMPLIANCE MONITORING*

Ensuring workers follow established workplace safety procedures and practices is a key component of an effective safety program. Under the *Workplace Safety and Health Act*, failure to do so could result in substantial fines (up to $250,000 for first offence, up to $500,000 for second offence) to the City. The City and its employees could also be held criminally negligent.

Although the *Organizational Safety Code of Practice* indicates that corrective actions associated with unsafe acts must be documented the current practice for the majority of supervisors we interviewed is through informal verbal reminders for such things as not wearing their personal protective equipment, not following safety procedures, etc. with no written record of the interaction. We found this informal compliance monitoring is employed by all departments for issues that do not result in an incident and even on occasion for issues that do result in a minor incident. This informal method is appropriate as a first step in compliance monitoring for minor incidents, especially if coupled with demonstrating or teaching the safe way of performing a task. Formally documenting an incident of non-compliance or requiring the employee to attend before a departmental panel (comprised of a management representative, union representative and an independent third party) has been reserved for only the most serious incidents.

Providing verbal reminders is a good method for coaching and a reminder for momentary memory lapses of judgment but to date has not proven effective in reducing the number of work related incidents. The Performance Analysis section of this report highlighted the increase in workplace safety incidents reported and costs associated with these workplace safety incidents. Instances of verbal reinforcement need to be documented and followed up on so that necessary corrective action can be taken and progress tracked. If there are repeat issues, these need to be escalated and documented. Documenting the informal interaction that already occurs between supervisors and employees will provide several benefits:

- Staff will understand and believe that safety is taken seriously by management and the City.
- It will provide continuity when there is a change in a supervisor.
- Documentation will demonstrate proper supervision of staff and compliance with the Act.
- Repeat issues will identify training opportunities.
- A more proactive, rather than reactive approach, should serve to reduce the number and severity of incidents over time.

Currently there is a gap between the established standard of documenting corrective actions for unsafe acts and practice. This is in part due to a lack of awareness and reluctance to “write people up” and escalate unsafe acts, highlighting the need for supervisory safety training. The supervisory safety training and escalation of workplace safety incidents are addressed in the Training and Minimum Acceptable Safety Standards sections of the report respectively.

## PERFORMANCE INFORMATION AND MANAGEMENT

For a performance information system to be effective it must provide sufficient information to answer the following question: Is the safety program working as intended and in compliance with existing legislation? This question implies the City is proactively managing its performance with respect to safety. To date, the Loss Time Injury (LTI) statistics has been the primary information reported on workplace safety. When we only measure major incidents or injuries, we limit our ability to understand all the causal factors in the workplace.

> *"Managing safety only by LTI, is like playing tennis with your eye on the scoreboard and not on the ball"*
> *(Bernard Borg, 2002, Predictive Safety from Near Miss and Hazard Reporting)*

For the Director of CSS to answer the question on the performance of the safety program, complete, accurate and timely performance information must be available. Department Directors will also rely on this performance information to know the status of safety within their departments. Establishing minimum standards with respect to the data that is to be collected and reported, the processes required to confirm its accuracy and the frequency of reporting is critical to ensuring the right information is being used by the right people at the right time to effectively manage the workplace safety program.

### *Minimum Reporting Standards*

The Organization Safety Performance Report provides information on the Workers Compensation related statistics of Loss Time Injuries (LTIs), segregated by frequency and severity. While this information is a critical component, more comprehensive information is needed to fully understand the status of organizational safety within the City. The Director of CSS must be able to access a set of information which would include at a minimum:

- number of safety incidents for time period - broken down by report only (RPO)/near miss accident report, health care only (HCO) and LTI;
- corrective actions implemented in time period - as a percentage of total incidents;
- improvement orders and/or fines and penalties issued by the Province
- training statistics - percentage of supervisors with required safety training, percentage of workplace safety committee members with required training, percentage of new staff that received safety orientation in time period;
- Job Hazard Analysis and Safe Work Procedures documentation - percentage of medium and high risk job tasks with these documented procedures in place;
- Hazardous Materials documentation; percentage of hazardous materials without Material Safety Data Sheet (MSDS);
- cost of safety incidents – including direct labour cost, downtime, cost of rehabilitation, replacement labour cost; and
- all information should be available for analysis by department, division and branch and comparable to past years' results.

Differentiating incidents by Report Only (RPO) which does not involve a hospital visit or lost time, Health Care Only (HCO) which involves going to doctor, but no time loss and Loss Time Injury (LTI) where there is regular time loss from work is critical to build longer term understanding of safety issues. Tracking the sick time is also important as it may provide a leading indicator of potential safety issues as some staff will use sick time as opposed to reporting a minor workplace injury.

Near miss reporting will also act as a leading indicator to identify areas where preventative action could result in the reduction of future accidents. Our review of safety reporting literature highlighted that there is a range in the expected optimal ratio of near misses to incidents, from 15:1 to 300:1. In 2012, the City of Winnipeg's ratio was 0.03:1, which means that there is only one near miss reported for every 33 incidents. This is far below the expected range and indicates a significant lost opportunity to identify and address potential risk areas before they result in an incident.

The inclusion of a cost figure, while not directly necessary for compliance with the Act, is a key measure that can assist in bringing the necessary attention to safety. Currently, the City does not have the systems in place to track all the costs associated with safety incidents, but starting with the costs of the time off would be a good point from which to build.

The compilation of this information should facilitate the drill-down into the above statistics by department, division, nature of injury, age of the employee, and years in current position. This will enable more detailed analysis to identify trends or training opportunities.

## Data Accuracy

Accurate data is the cornerstone to provide all decision-makers, from Directors to Supervisors, with the information necessary to make optimal decisions. We performed a number of different procedures to test the accuracy and completeness of the data within PeopleSoft over a four year period, 2009 - 2012. Overall the data appears to be reasonably complete and accurate. However, we did note the following discrepancies: WCB time entered as sick time, HCO incidents misclassified (42 incidents with greater than 20 hours of time lost), incomplete data entries or incidents with incorrect department identification and incidents not always updated when they change status.

The majority of these issues can be resolved by better guidance such as data definitions and maintenance procedures to be used within the departments. Exception reporting should be performed quarterly to identify data anomalies and allow appropriate staff to investigate and resolve the issue. Below is a listing of potential exception reports that could be performed to improve integrity of the data.

- A list of all pending incidents should be reviewed and all items listed as pending should be confirmed or changed to their appropriate status.
- A list of all incidents that are denied coverage by WCB but have loss time associated with them.
- A list of all incidents that are accepted coverage by WCB but do not have any loss time associated with them.
- A listing of HCO events with significant amounts of loss time.
- A listing of incidents that are incomplete or have incorrect data.

Exception reporting is an efficient tool using existing systems functionality to ensure the data collected across the departments is consistent and accurate. Data integrity issues that are left unresolved could result in an underreporting or misclassification of loss time injuries and undermine the reliability of the data to be used in identifying and addressing safety related issues.

## Timely Communication of Information to Users

Information must be timely to be useful especially when managing safety on a proactive basis. The frequency of reporting will vary depending on the specific role of the users. However, people who perform the same role should have access to the same type of information at the same time throughout the organization. The majority of the reporting for Departmental Directors and Managers was occurring quarterly which is appropriate for that level. The information reported to this level should be more summary in nature and highlight exceptions where their involvement would be beneficial. The provision of a more comprehensive package of information, as defined previously, will support them in executing their responsibility for overall safety within their department.

The direct supervisory level, who are accountable to their Director and primarily responsible for workers safety, and safety officers who are also responsible for oversight would require more detailed information on a more frequent basis (monthly) to identify potential issues. The information provided to supervisors should include trend analysis, information on the types of injury (number and type of near misses/RPO, HCO, and LTI) and status of corrective actions. This allows supervisors to identify potential issues before they manifest into safety incidents and to ensure other aspects of the safety program are functioning as intended.

Through our audit work, it was evident that staff are not getting the safety information necessary to fulfill their roles related to safety. In the absence of this information they are left to manage safety issues on a case by case basis, which is neither effective, efficient nor practical given the potential impact on staff. Ultimately, timely information reported at the correct level will facilitate a consistent analysis of the safety environment and lead to better informed decisions.

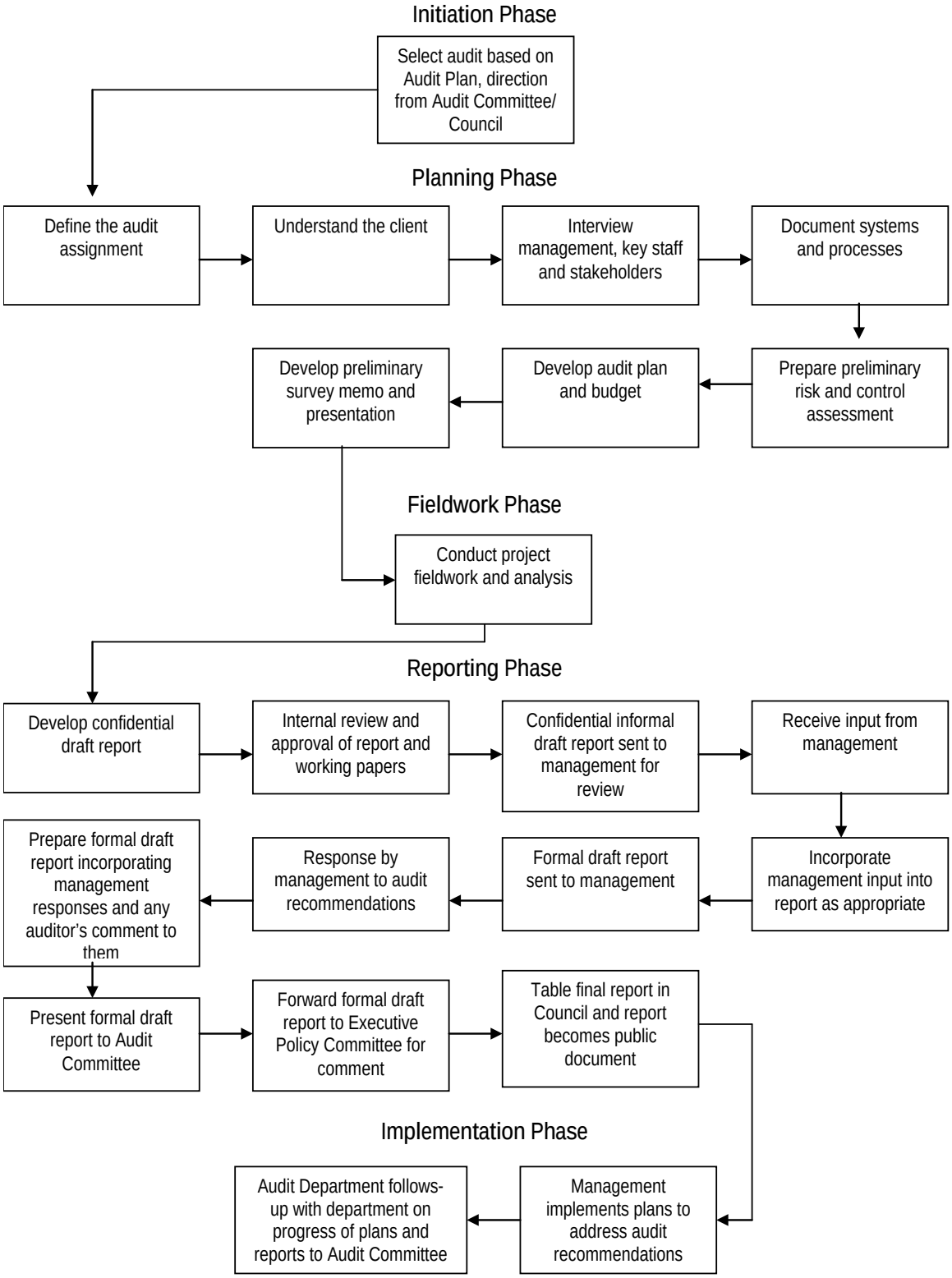
***Recommendation 7***

Director of CSS, with input from the users of the performance information, should establish minimum standards for the type of information to be collected and reported, guidance to ensure data integrity and mechanisms to ensure the right staff receive the right information at the right interval. This will allow the departments and the organization to proactively manage the performance and cost of the safety programs throughout the City.

***Management Response***

Agree. Under the direction of the Director of Corporate Support Services, the Organizational Safety and Occupational Hygiene Branch will work with departmental safety resources and HR Leaders to create a comprehensive set of safety performance metrics to be used as indicators of regulatory compliance and injury reduction efforts. These metrics will be collected and reported according to the process for safety performance measurement and reporting established in response to Recommendation #2.
Timeline: Second quarter 2014

# APPENDIX 1 - AUDIT PROCESS



## APPENDIX 2 - SUMMARY OF RECOMMENDATIONS

**Recommendation 1**
Director of CSS should ensure Administrative Standard HR-010 is re-communicated to all organization and departmental leaders with emphasis put on the respective roles and responsibilities and further defining the expectations for oversight.

**Recommendation 2**
Director of CSS establish a more comprehensive set of minimum safety standards for the organizational safety program to be implemented in all departments to monitor compliance with the *Workplace Safety and Health Act*.

**Recommendation 3**
Director of CSS should ensure the Organizational Safety and Occupational Hygiene Branch perform the expanded oversight responsibilities as defined in Administrative Standard HR-010.

**Recommendation 4**
Director of CSS to require regular reporting of safety performance information by the departmental human resource leaders to the Organizational Safety Branch. Departmental human resource leaders should work with departmental safety resources, where applicable, and their Department Heads to ensure organizational safety initiatives are implemented and performance information reported to demonstrate the departments' compliance with the *Workplace Safety and Health Act*.

**Recommendation 5**
Director of CSS ensure that the *Organizational Safety Code of Practice* be updated to include the above noted safety responsibilities for a supervisor and communicated throughout the organization.

**Recommendation 6**
The *Organizational Safety Code of Practice* should be amended to include departmental and organizational safety resources as contacts for escalating a safety concern.

**Recommendation 7**
Director of CSS, with input from the users of the performance information, should establish minimum standards for the type of information to be collected and reported, guidance to ensure data integrity and mechanisms to ensure the right staff receive the right information at the right interval. This will allow the departments and the organization to proactively manage the performance and cost of the safety programs throughout the City.