

COMMUNITY LIVING BRANT
POLICY AND PROCEDURE MANUAL

SUBJECT: Health and Safety Management System Review Policy	POLICY NO.: 2.19 PAGE 1 of 5
FILE UNDER SECTION: 2 - Health and Safety	EFFECTIVE DATE: August 2010 REVISION DATE: March 2019



Debbie Cavers
Executive Director

POLICY:

- Community Living Brant is committed to a Health and Safety Management System that meets the Accreditation Standard of the WSIB Accreditation for Ontario Workplace Standard.
- To ensure an on-going commitment to meeting this standard a review will be completed annually to benchmark progress and identify areas of improvement.

PURPOSE:

1. To provide a process that reviews the Health and Safety Management System (HSMS) of Community Living Brant.
2. To ensure the HSMS objectives are met and the system is implemented, maintained and effective.
3. ^{...} To build a culture of organizational health, safety, and wellness using the plan, do, check and act approach with a focus on continual improvement.
4. To provide senior management with objective information on which they can improve Community Living Brant's health and safety activities.

SCOPE:

- The WSIB Health and Safety Management System Review Form and WSIB Work Reintegration Policies will be used as the criteria to measure audit evidence.
- All service areas provided through Community Living Brant (Accommodation Services, Respite Supports, Community Support Services, Day Program and Employment and Administrative Supports) will be reviewed
- A formal annual audit of the Health and Safety Management System and Return to Work Standards of Community Living Brant will assist in the development and implementation of a Continual Improvement Plan to correct all identified non-conformities, with priority given to major non conformities.
- A formal Audit Plan will be developed and approved each year by Senior Management to outline the audit criteria, audit scope, audit schedule and needed audit resources.

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DEFINITIONS:

HSMS:

Health and Safety Management System is a documented process that fully incorporates effective risk management principles into a health and safety program

Audit:

The systematic, independent and documented process for obtaining audit evidence and evaluating objectively to determine the extent to which audit criteria are fulfilled

Conformity:

The fulfillment of the audit criteria which includes requirements of an audit standard, the workplace's health and safety policies and related documentation. There must be two pieces of evidence to prove conformity.

Non-Conformity:

Is the non-fulfillment of or deviation from, the requirements. It is categorized as Major or Minor.

Major Non-Conformity

- a) The issue will continue to occur because of how the HSMS and health and safety program are structured
- b) There is unacceptable risk to a workers' health and safety
- c) There are serious legal implications or
- d) There is an accumulation of related minor non-conformities

Minor Non-Conformity

- a) The HSMS and the health and safety program structures are valid, but there was minor deviation (ie Human error)
- b) There is no unacceptable risk to the worker
- c) There are no significant legal implications or
- d) There is not an accumulation of related minor non-conformities

ROLES AND RESPONSIBILITIES:

Employer/Senior Management:

- Initiate the development and approval of an annual Audit Plan. The audit plan must include audit objectives, audit scope, audit criteria, audit schedule, forms, audit resources and auditors requirements.
- Ensure internal audit is conducted as per set schedule
- Ensure the person assigned to complete internal audit is trained on auditing principles either by PSHSA Auditor Training or equivalent (CSA, QMI, HACCP) as acceptable
- Review HSMS document once completed and sign off on findings
- Responsible for the non-conformities and developing a priority based Continual Improvement Plan / Action Plan to address the results of the HSMS Review Audit Report
- Review and sign off on Continual Improvement Plan with timelines and accountability assigned

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- Ensure a priority based Continual Improvement Plan is initiated in current year and all remaining non-conformities are initiated within six months of the completion of the audit.
- Review and revise as necessary auditing process based on findings from Internal Auditor
- Senior Management to sign off on the Continual Improvement /Action Plan
- Review and monitor the Continual Improvement /Action Plan on a quarterly basis until completion

Internal Auditor:

- Obtain required auditor training (PSHSA Auditor Training or equivalent (CSA,QMI, HACCP) as acceptable)
- Use a WSIB approved Health and Safety Management System Review Form to conduct the internal audit.
- Conduct the audit according to the Audit Plan
- Document all evidence collected during the Audit
- Determine findings for all sections of the audit based on the collected evidence, identifying as minor or major non conformity
- Sign off and date the completed audit and any additional audit reports
- Assist with developing a Continual Improvement Plan for all major and minor non-conformities with specific timelines, assigned responsibilities, and Senior Management commitment
- Consider including conformity areas on the continual improvement plan if appropriate
- Provide documentation of evidence of Senior Management review of completed audit and continual improvement plan
- Evaluate auditing process and summarize areas of improvement for Senior Management

Supervisors

- Participate in the Health and Safety Management System Review process as required

Employees

- Participate in the Health and Safety Management System Review process as required

Joint Health and Safety Committee

- Review the findings of the HSMS review and the Continual Improvement Plan
- Monitor the steps of the Continual Improvement Plan
- Make recommendations as appropriate

PROCEDURE

- 1) The Director, Administrative Support Services or a designate appointed by this person identifies the gaps in the HSMS and records the findings on the HSMS Review Form (Appendix A).
- 2) The appointed person must have completed the Introduction to Auditing training offered through PSHSA or equivalent (CSA, QMI, HACCP as acceptable)
- 3) The HSMS Standard and Audit will be communicated to the JHSC and all appropriate staff.

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- 4) Annually an audit plan shall be developed including the objectives of the audit, the scope of the audit, the audit criteria and the audit schedule.
- 5) The audit plan will be approved by senior management prior to beginning the audit.
- 6) The qualified person (person that has completed the Introduction to Auditing training) shall conduct the audit.
- 7) Document review is the first step to determine initial conformity to WSIB HSMS Review Form. Documents to be reviewed would include but not limited to Community Living Brant's policy and procedures, records such as return work information, injury reports work place inspections,
- 8) Additional evidence/ information shall be gathered from other sources such as interviews, on-site observations.
- 9) Notes shall be taken as part of the audit process.
- 10) The auditor will determine conformity and non-conformity based on the collected evidence. The non- conformity shall be identified as minor or major non- conformity.
- 11) The person assigned to complete the audit shall write a report for Senior Management
- 12) An audit report is written, signed and dated by the qualified auditor
- 13) The completed HSMS Review Form and signed audit report is forwarded to the Senior Management for formal review and sign off. Senior Management ensures that any non-conformity identified is addressed in a timely manner, with priority given to the major non-conformities.
- 14) As a result of the review and examination of findings, the Senior Management will prepare and implement a priority based Continual Improvement Plan
- 15) The findings of the HSMS Review and Continual Work Plan will be communicated with the JHSC, and all appropriate staff.
- 16) Senior Management will initiate action items in the current year.
- 17) The HSMS review and Continual Improvement Plan will be completed annually and signed off by senior management prior to the end of the calendar year. Quarterly reviews of the Continual Improvement Plan shall occur.
- 18) Senior management will be responsible for ensuring ongoing monitoring and auditing of the HSMS
- 19) Senior management will review the completed HSMS and the Continual Improvement Plan for nonconformance and sign off on both documents
- 20) The HSMS Review process will be evaluated by the Senior Management and Auditing Team in consultation with the JHSC.

COMMUNICATION

- Senior Management and Supervisors will be informed of the Health and Safety Management System Review schedule as required through meetings
- The findings of the HSMS Review and Continual Improvement Plan will be communicated with Senior Management and the JHSC at scheduled meetings, and others as appropriate
- All communication of the review and action plan will be documented in the Joint Health and Safety Committee Minutes

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TRAINING

- The person assigned to complete the Health and Safety Management System review will have completed the WSIB's intro to Auditing training or other formal audit training.

EVALUATION

- The HSMS Review process will be evaluated by the Senior Management and Auditing Person (team) in consultation with the JHSC
- Items to be evaluated would include but not limited to: was the auditing schedule appropriate, were the proper people approached when completing the audit, were there gaps in the audit process, were the appropriate people informed about the results of the audit.

ACKNOWLEDGE SUCCESS/MAKE IMPROVEMENT

- Acknowledge negative and positive outcome of the audit
- Acknowledge all employees who contributed to the success
- Develop a continual improvement plan to prevent and correct non-conformities
- Initiate action items in current year and all remaining non-conformities will be initiated within six months of the audit being completed.
- Senior Management commitment to continual improvement plan

REFERENCE MATERIAL

- WSIB HSMS 2019 Review Form (Appendix A)
- WSIB –Safety Group Program –Introduction to Auditing training material
- Safety Groups Program Employer Guidelines (5th Edition)
- WSIB Work Reintegration policies
- Community Living Brant's Policies and Procedures
- Annual Summary Reports of Incident Reports
- Safety Group Audit Resource Employee Interview Questions & Observations

