

Human Resources Policies  
Policy Development & Implementation  
Occupational Health & Safety Policy Development,  
Communication & Implementation - Roles and Responsibilities

Category: **Health and Safety**  
Sub-Category: **General**

## Policy Statement

### Purpose

Ontario's health and safety legislation requires the City, as an employer, as well as its officers and directors, to take every reasonable precaution for the protection of workers. It clearly specifies requirements for the establishment of a health and safety policy and development of a health and safety program to implement the policy. The development and implementation of health and safety policies, practices and procedures that are based on regulatory requirements, industry standards and recognized best practice are key elements of an occupational health and safety program. An effective program facilitates the consistent application of health and safety principles across the organization which, in turn, assists in demonstrating that the City and its officers and directors are duly diligent in the protection of worker health and safety.

### Policy Development

Corporate occupational health and safety policy and/or guideline development has been initiated by a number of means, with the most common being a recommendation of the Occupational Health and Safety Co-ordinating Committee. Policy and/or guideline development has, on occasion, being initiated as a result of needs identified by senior management, Legal Services, City divisions or through Ministry of Labour orders.

**The Occupational Health and Safety Co-ordinating Committee** was established to assist the City in establishing a Corporate Occupational Health and Safety Program and in ensuring the effective operation of the program. This Committee is not intended to be a joint health and safety committee, as defined in the Occupational Health and Safety Act, nor is it meant to assume the responsibilities, or duplicate the activities, of legislatively-mandated joint health and safety committees (e.g. workplace inspections, investigation of critical injuries and work refusals, identifying health and safety concerns at the local level and making recommendations regarding these concerns). Its mandate, outlined in Report No. 2 of the Administration Committee, as adopted by the Council of the City of Toronto at its meeting held on July 27, 28, 29 and 30, 1999, includes recommending policy on occupational health and safety matters affecting the entire City and monitoring policy implementation.

In fulfilling the role, the Occupational Health and Safety Co-ordinating Committee will:

- Identify the need for development of a policy and/or guideline. The need for policies and/or guidelines may result from:

- legislative requirements (e.g. confined space, traffic control)
  - the City's injury and illness experience (e.g. workplace violence)
  - best practices in other jurisdictions that have relevance to the City (e.g. working alone safely)
  - Ministry of Labour guidelines (e.g. heat stress, sun protection)
  - Ministry of Labour orders or advice (e.g. managing health and safety aspects of contracts for service)
  - issues identified by stakeholders (e.g. management of City divisions, joint health and safety committees through surveys or other means)
- Advise the divisions they represent that a policy and/or guideline is to be developed and inquire whether any or all of these divisions wish to delegate a representative to the working group. (Note: Management members of OHSCC sometimes represent more than one division, not just their own division. A suitable mechanism for communicating to all areas they represent must be established).
  - Distribute drafts of policies and/or guidelines to senior management of the divisions they represent, indicating the means by which feedback can be provided to the working group (i.e. that comments or concerns should be forwarded to the working group lead).
  - Participate in discussion of draft policies and/or guidelines at OHSCC meeting and recommend, based on policy and/or guideline content and issues raised, whether and when to endorse the policy and/or guideline.
  - Forward OHSCC-endorsed policies, accompanied by a memorandum outlining the most significant implications of the policy, to the City Manager for approval.

**Senior management of City divisions will:**

- Identify to OHSCC policy and/or guideline needs as they arise.
- Assign member(s) to policy and/or guideline working groups, as appropriate.
- Review or delegate review of policy and/or guideline drafts to staff, so as to ensure any needed input is provided into policy and/or guideline development.
- Identify support for policy and/or guideline, subsequent to identified areas of concern (if any) being addressed or identify outstanding issues that preclude such support.
- Consider and estimate costs of policy implementation and advise if these costs necessitate consideration of a staged policy implementation schedule.

**Union health and safety representatives will:**

- Assign member(s) to policy and/or guideline working groups, as appropriate.
- Review policy and/or guideline drafts and provide comment/input.
- Identify support for policy and/or guideline, subsequent to identified areas of concern (if any) being addressed or identify outstanding issues that preclude such support.

**Working group members will:**

- Prepare policy and/or guideline, consult with the area(s) they represent

and identify issues of the work operations they represent, so that they can be appropriately addressed in policies and/or guidelines.

### **Occupational health and safety staff**

The City's occupational health and safety staff are responsible for providing advice on occupational health and safety matters. Additionally, the OHSWC team is responsible for providing administrative and research support for the OHSCC.

#### **OHSWC will:**

- Conduct environmental scanning (e.g. legislative environment, City injuries or illnesses, recurrent themes arising through joint health and safety committees) and provide information to Occupational Health and Safety Co-ordinating Committee (OHSCC) to assist during consideration of whether policies and/or guidelines are needed.
- Prepare initial draft of policy and/or guideline, where needed, based on legislative requirements and accepted industry standards and practices, to assist the OHSCC-appointed policy and/or guideline working group in its policy and/or guideline development process.
- At the time determined appropriate by the working group, provide draft policy and/or guideline to OHSCC members for distribution to areas they represent in order to obtain input, as well as to identify and address concerns prior to approval.
- Provide draft policies and/or guidelines to business unit health and safety staff, for their review, input and consultation with clients.

#### **Occupational health and safety consultants will:**

- Based on client input, assist in identification of the need for corporate occupational health and safety policies and/or guidelines.
- Upon receipt of draft policies and/or guidelines, consult with their client group and identify areas of concern, if any.
- Provide input into the development of corporate policies and/or guidelines, based on own expert knowledge of work operations within their client divisions and client consultation.

### **Communications to City Manager- Approved Health and Safety Policies**

All occupational health and safety policies must be approved by the City Manager. Guidelines in support of City Manager's approved policies require OHSCC approval.

Following City Manager approval of occupational health and safety policies and/or OHSCC approval of health and safety guidelines, OHSWC (in its support role) will:

- Distribute City Manager approved occupational health and safety policies and/or OHSCC-approved health and safety guidelines to senior management (executive directors, general managers and directors).
- Distribute City Manager approved occupational health and safety policies and/or OHSCC-approved health and safety guidelines to OHSCC members and alternates.
- Distribute City manager approved occupational health and safety

policies and/or OHSCC-approved health and safety guidelines to occupational health and safety staff via e-mail.

- Distribute approved policies and/or guidelines to joint health and safety committee co-chairs via e-mail, where possible, otherwise via hard copy through interoffice mail.
- Post all approved health and safety policies and guidelines on HR Web on the City's intranet site.
- Use a Corporate Communications group-wise message to advise all staff with access to groupwise that a new health and safety policy has been approved and how it can be accessed.
- Provide information regarding policies approved within the past year to all joint health and safety committee members at the annual JHSC Recognition Event.

**Management members of OHSCC will:**

- Advise senior management of the divisions they represent that a policy and/or guideline has been approved, reminding them to ensure that the policy and/or guideline is distributed to all supervisory staff and tabled with joint health and safety committees. (Note: Management members of OHSCC sometimes represent more than one division, not just their own division. A suitable mechanism for communicating to all areas they represent must be established).

**Senior management of City divisions (OHSCC members and others) will:**

- Ensure that approved occupational health and safety policies and/or guidelines are distributed to all levels of management, including management co-chairpersons of joint health and safety committees, and indicate their expectation that implementation will be initiated.
- Identify the person(s) within their divisions who are responsible for policy implementation.

**Management co-chairpersons of joint health and safety committees will:**

- Ensure that new policies and/or guidelines are tabled as agenda items at joint health and safety committee meetings.

**Front line managers and supervisors will:**

- Communicate those aspects of policies and/or guidelines applicable to their work operations to those employees who report to them (e.g. in work site sessions, tailgate sessions, in staff meetings, in training sessions, by posting in the workplace).
- Document that policies and/or guidelines have been communicated to employees.

**Implementation of  
Approved Health and  
Safety Policies**

Each occupational health and safety policy and/or guideline establishes responsibilities for the workplace parties (most typically senior management, management and supervisory staff, workers, joint health and safety committees and occupational health and safety staff). All parties identified as having

implementation responsibilities in occupational health and safety policies and/or guidelines will meet these responsibilities. Most hazard-based occupational health and safety policies and/or guidelines have the following basic requirements (or recommendations, in the case of guidelines):

- completion of a hazard assessment to determine those employees who are at risk of exposure to the hazard and those work activities that place them at risk,
- consultation with joint health and safety committees during this process,
- identification and institution of protective measures to minimize or eliminate the hazard and its associated risk, and
- provision of information about the hazards and protective measures to employees who are determined to be at actual or potential risk.

**Senior management** responsibilities to facilitate implementation include:

- ensuring that they or their designate(s) develop(s) an implementation plan for the policy and/or guideline.
- providing needed supports for policy and/or guideline implementation (e.g. incorporating into budget planning process, if needed).
- where needed, depending on individual divisional needs, develop divisional guidelines related to the policy to meet operational requirements
- monitoring policy implementation.

**Management/supervisory** responsibilities to facilitate implementation include:

- conducting a hazard assessment to determine those employees who are at risk of exposure to the hazard and those work activities that place them at risk (with assistance from occupational health and safety staff, as needed).
- development of safe work procedures (with assistance from occupational health and safety staff and in consultation with the joint health and safety committee).
- ensuring that needed protective devices, measures and procedures are available and that workers are familiar with and utilize them.
- ensuring that all staff to whom the policy and/or guideline applies are aware of the policy and/or guideline and measures to protect them [e.g. through staff meetings, work site sessions, tailgate sessions, formal training sessions (where appropriate), postings on bulletin boards in workplaces].
- monitor compliance with policy, at the division and employee level.
- seeking budget for the resources needed to enable policy implementation. (Note: In some cases, needed resources need to be approved as part of the budget process)
- responding to employee concerns that are brought to their attention regarding the policy and/or guideline.
- managing employee performance regarding compliance to policy.
- maintaining documentation of information or training sessions that are delivered.

**Worker** responsibilities to facilitate implementation include:

- wear and/or use any protective equipment provided to them in response to an identified hazard.
- follow the safe working procedures that have been developed.
- report any health and safety concerns to their supervisors.

**Human Resources occupational health and safety staff** responsibilities to facilitate implementation include:

- providing consultation to client divisions in the development of safe work procedures to enable compliance with policies.
- consulting with client divisions regarding the provision of training to those that require it.
- maintaining documentation of training sessions that they provide.
- assisting management/supervisory staff in responding to employee concerns, as needed, including seeking specialized assistance from OHSWC, where needed.

**OHSWC** staff responsibilities to facilitate implementation include:

- to ensure consistency and efficiency in policy implementation, assisting in the development of training materials.
- assisting in identification of appropriate protective measures for employees.
- in its OHSCC support role, preparing and distributing twice annually a list of occupational health and safety policies (with new policies highlighted), with a request that the list be posted in workplaces
- providing reports on implementation status, upon request, for inclusion in reports to the OHSCC and senior management.

**Joint health and safety committee** responsibilities to facilitate implementation include:

- maintaining as a standing agenda item "Occupational Health and Safety Policies" and reviewing new policies as they are received and current policies on an ongoing basis.
- where appropriate, making recommendations with respect to action items and/or time frames for policy implementation.

<b>Approved by</b>	Executive Management Team (EMT), May 25, 2004 Occupational Health & Safety Co-ordinating Committee (OHSCC), February 24, 2004
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