

ACCREDITATION FOR ONTARIO WORKPLACES

CONSULTATION PAPER

February 22, 2007

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ACCREDITATION FOR ONTARIO WORKPLACES

1. INTRODUCTION

The vision of the Workplace Safety and Insurance Board (WSIB) is the elimination of all workplace injuries and illnesses. Since 1998, the WSIB had a legal mandate to develop standards for the accreditation of employers who operate successful health and safety programs. More recently, the WSIB's five-year plan for 2006-2010, *The Road Ahead*, committed the WSIB to "assume a leadership role, actively promoting the development of innovative solutions and responses in the areas of prevention and return to work."

To fulfill the promise of its prevention mandate and leadership role, the WSIB proposes to establish a workplace health and safety accreditation program, in consultation with key participants and stakeholders.

Workplace health and safety accreditation was proposed because it has the potential to promote the systematic prevention of injuries, illnesses and fatalities and to reduce the human, financial and societal costs that they entail.

In this context, the term "accreditation" refers to recognition that a workplace's occupational health and safety (OH&S) policies and programs meet an accepted standard.

The primary purpose of an accreditation program is to promote the adoption of a health and safety management system which includes world class policies, programs and practices in Ontario workplaces. An essential part of this objective is to recognize employers or organizations that have superior health and safety programs and performance, and who encourage others to achieve similar results.

This consultation paper presents the general objectives, concepts, guiding principles and proposed elements of an accreditation program for Ontario workplaces. It outlines issues and options to be considered in designing an accreditation program, and proposes a development process and model.

Questions are posed for stakeholders to consider throughout the paper. The WSIB invites stakeholders to provide feedback on these questions, and on any other issues of concern regarding accreditation.

2. SUPPORT FOR AN ACCREDITATION PROGRAM

2. (a) The WSIB's Legal Mandate

Interest in health and safety accreditation in Ontario has been longstanding. In 1981 the Minister of Labour's *Advisory Council on Occupational Health and Occupational Safety* produced a comparison of different accreditation schemes.¹ In 1990, *Bill 208* assigned accreditation functions to the Workplace Health and Safety Agency.²

In January 1998, the WSIB's mandate for accreditation was established in the *Workplace Safety and Insurance Act (WSIA)*, Part II, Injury and Disease Prevention, Section 4, which states:

4(1) In order to promote health and safety in workplaces and to prevent and reduce the occurrence of workplace injuries and occupational diseases, the Board's functions include the following:

- 6. To develop standards for the accreditation of employers who adopt health and safety policies and operate successful health and safety programs.*
- 7. To accredit employers who meet the standards.*

2.(b) Stakeholder Interest and Participation

Industry groups across Ontario have expressed an interest in the creation of an accreditation program for health and safety. Recognition programs with aims similar to accreditation have had reasonable success, and the construction industry, in particular, has been engaged in Certificate of Recognition (COR) programs in other provinces for a number of years.

In August 2006, a group of employer representatives, called the Accreditation Working Group (AWG), presented their recommendations for an accreditation program to the WSIB's senior management. AWG represented several major sectors of Ontario's economy, including construction, health care, mining, chemical, automotive and steel manufacturing.

The AWG report noted: "employers have a legal, ethical and moral responsibility to provide a safe and healthy workplace. A Health and Safety management system forms the foundation of being able to fulfill those responsibilities and prevent injuries and illnesses in the workplace." One of the AWG's statements on general requirements for accreditation states:

"If an accreditation program is to work it must be based upon a good design that is founded upon recognized international standards, is flexible for different users, is adaptable to allow for integration of other recognized assessment needs, and reduces the costs and administration to the regulating authorities."

The recommendations of the AWG are set out in Appendix 3.

¹ Advisory Memorandum 80-111 to the Minister of Labour: Concerning Policies and Principles for Monitoring and Maintaining Occupational Health and Safety Standards in the Workplace: Accreditation, External Audit and Internal Audit Programs. January 1981.

² Bill 208. An Act to amend the OH&S Act and the Workers' Compensation Act. 1990

3. POTENTIAL BENEFITS AND RISKS

3.(a) Potential Benefits of an Accreditation Program

The primary benefit of an accreditation program would be its value in preventing workplace injuries, illnesses, and fatalities, and in preventing the human and financial costs they entail. In addition to these central objectives, an accreditation program could also achieve the following:

- Promote an understanding of the qualities and practices known to be associated with superior health and safety outcomes. Even if workplaces are not ready to participate in accreditation, they could benefit from knowing the standard requirements. Interest in the services of Health and Safety Associations (HSAs) and other OH&S consultants would likely increase, as firms consider pursuing accreditation.
- Stress a proactive injury prevention approach, as opposed to programs based on reactive injury performance measures.
- Provide an additional opportunity to focus on specific high risk hazardous operations and environments, as well as important priorities such as return to work.
- Be a source of pride and recognition. Accredited firms would signal to their employees, customers and the general public that they value health and safety. It could offer a new opportunity to encourage higher performance, positive business results, and the alignment of Ontario with other Canadian jurisdictions.
- Identify firms with good OH&S practices. Accreditation would allow these firms to be recognized and stand out from the others. Since they would be expected to be viewed as leading companies on the path to eliminating workplace injuries and illness, they would be less likely to be non-compliant.
- In light of increasing trends toward outsourcing, contract work, and growth of the contingent work force, if used as a criterion for contracts and purchasing, accreditation could help ensure that contractual relationships are subject to the same health and safety standards as direct employment relationships.

3.(b) Potential Risks of an Accreditation Program

The following are potential risks of implementing an accreditation program. However, they can be anticipated and mitigated by good program design.

- Employers may find that accreditation does not provide a meaningful monetary reward. There is also a risk that the costs of participating in the program may be seen as outweighing the potential rewards.
- The program may fail to obtain support from the buyers of products and services, resulting in a lack of motivation on the part of supplier firms to pursue accreditation. Business may not accept accreditation as a valuable tool in qualifying for project bids.

- Participation in the accreditation program may not result in expected decrease in work-related injuries and illnesses, or, at least, not quickly enough for some participants. This could mean that the standards set for accreditation do not match the prevention needs of the workplace, or that it will take longer to demonstrate an effect.
- If standards, audit tools or program delivery are not well-designed and administered, various unacceptable outcomes could ensue, such as: a perception that the accreditation program is unfair, that accreditation standards are too low or too onerous, especially for small or less experienced organizations.

4. PROPOSED GUIDING PRINCIPLES FOR ACCREDITATION

The following principles are proposed to guide the WSIB in the design of an accreditation program:

- **Program Objective:** The objective of an accreditation program is to encourage organizations to incorporate a health and safety management system into day-to-day operations, to uphold superior standards of health and safety practice and to align with the WSIB's vision of eliminating all workplace injuries and illnesses.
- **Open, Voluntary Participation:** Every workplace has the opportunity to participate in the accreditation program regardless of past health and safety practices and/or performance.
- **Superior Performance:** Accreditation standards exceed minimum legal requirements and motivate progress toward superior performance.
- **Demonstrated Leadership:** Leadership is demonstrated, by example, at all levels of supervision and management.
- **Worker Participation:** Demonstrated worker participation is a key element of any health and safety program. A good labour/management environment is essential for effective OH&S systems.
- **Measures to Control Hazards:** The workplace parties recognize, assess and control hazards by implementing highly effective policies and procedures which form the basis of any health and safety program.
- **Recognition of other Programs:** The WSIB recognizes other third party certification programs with health and safety standards and outcomes equivalent to the WSIB's accreditation program.
- **Recognition and Reward:** The WSIB recognizes the need for an accreditation reward (monetary and/or other) that is meaningful to the workplace parties and also preserves the financial integrity of the workplace safety and insurance system.
- **Alignment of Reward:** Any reward for accreditation is aligned with existing financial incentive programs including: NEER, CAD-7, MAPP, SCIP and Safety Groups.
- **Sustained Performance & Continuous Improvement:** Accredited employers demonstrate sustained superior performance in their health and safety programs and strive for continuous improvement.

5. PROGRAM DESIGN: ISSUES AND OPTIONS

The general objective of an accreditation program would be to promote the adoption of superior OH&S policies, programs and practices in Ontario workplaces. Accreditation could help Ontario firms achieve their own prevention goals by promoting a standard known to be associated with successful health and safety outcomes.

A key feature of accreditation that has considerable stakeholder support, is the assessment of “before-the-fact” prevention activities, or leading indicators. Measurement of trailing or “after-the-fact” indicators, such as lost-time injuries statistics are not sufficient to ensure good prevention programs and practices.

Stakeholders are invited to consider the design for accreditation program, in relation to participation, the nature of incentives, what to include in the standard, the method of auditing for compliance to the standard, participants’ obligations, and program delivery.

5. QUESTIONS for the stakeholder:

- Do you think that the meaningful recognition of superior performance (accreditation) will be a valuable tool in eliminating workplace injuries and illnesses?
- In your view, what are the main advantages/disadvantages of implementing accreditation?
- Do you think that accreditation will have a positive effect, negative effect or no effect on the competitiveness of Ontario businesses?
- Do you think accreditation will improve health and safety in your workplace?
- Do you think accreditation will improve health and safety in workplaces across the province?

5.(a) Who Should Participate in an Accreditation Program ?

Accreditation for Ontario Workplaces is envisaged as a voluntary program, open to all WSIB-registered employers who choose to participate. There is no legislative authority that would require employers to participate in the program, if they do choose not to do so.

In some similar programs operating within and outside Ontario, having a Certificate of Recognition (COR) or certifying passport is a requirement or pre-condition to bidding for contract work. In such a situation, firms might be persuaded that becoming accredited is not only desirable but necessary.

Participating in an accreditation program might be more appealing or worthwhile to certain employers than to others. Firms that already have higher OH&S performance would likely find it easier to satisfy the accreditation standard and audit. However, accreditation could have the greatest impact on firms that have a lot of room for improvement in their health and safety practices.

5.(a) QUESTIONS for the stakeholder:

- Should firms be required to meet eligibility criteria (e.g. LTI frequency better than the rate group average) in order to apply to participate in the accreditation program?
- If so, please describe, in your view, what the eligibility criteria should be.

5. (b) What Types of Recognition Should Accreditation Offer?

Ideally, the recognition offered by accreditation should be shown to have the greatest potential for successfully motivating employers to improve work-related injury and illness prevention. General types of motivators known to be effective, are social, legal, and economic.

Social motivators:

Accreditation can be tied to positive public recognition of accredited companies, leading to improved employee morale and pride in the firm, improved public relations and possibly improved market position.

Legal motivators:

Because accreditation will be a sign of good health and safety practice, firms that achieve accreditation can be expected to have lower rates of injury and illness and therefore less likely to come to the attention of enforcement authorities.

Economic motivators:

Economic incentives can be expected to motivate employers in a number of ways:

- Market-based incentives can offer accredited firms the possibility of gaining a competitive advantage, either in bidding for contracts or in promoting their business to the public.
- Premium-based incentives can offer the possibility of lower workplace insurance costs.

Market-based incentives:

Market-based incentives have been used in Europe for product purchasing that sustains the environment, and in Canada on petrochemical, utility and heavy construction projects. It has been suggested that the market incentive option could be enhanced by making it a contracting requirement. Accreditation could confer a market advantage on firms that have good OH&S practices, and could provide advantages to both suppliers and buyers.

For supplier firms, accreditation could:

- Provide a business advantage to those firms with high quality OH&S programs and practices.
- Help to “level the playing field” so that firms would be disallowed from submitting low contract bids by cutting corners on health and safety.

For buyer firms accreditation could:

- Provide a consistent means of ensuring that suppliers have achieved a high level of OH&S practice.
- Help firms ensure due diligence in meeting their OH&S responsibilities.

WSIB Premium Incentives:

Another option is the possibility of tying accreditation to a positive or negative premium incentive. This approach could take several forms:

- providing lower base premiums for accredited firms,
- providing a rebate for accredited firms, or
- adding a surcharge to non-accredited firms.

See Appendix 4 for information on how incentives have been handled in other jurisdictions and programs.

5. (b) QUESTIONS for the stakeholder:

- What type of recognition (legal, social or economic) would motivate you to participate in an accreditation program?
- Do you think accreditation would help you to meet or exceed the requirements of the *Occupational Health and Safety Act*?
- Do you think accreditation would help improve the public perception/reputation of your business organization?
- If an economic reward (incentive) is required in order to participate, please describe what type of economic reward would be most desirable? How should this economic incentive be aligned with other WSIB incentive programs?
- In your opinion, what type of reward (incentive) would attract firms that need to improve their health and safety performance?
- Assuming superior occupational health and safety is recognized in an accreditation program, would you be willing to require your suppliers or sub-contractors to be accredited in order to conduct business with your organization?

5. (c) What should be Included in the Accreditation Standard and Audit?

Ontario's health and safety accreditation program standard and audit would share an evidence-based focus on the prevention of injury and illness. The standard would need to be general enough to be applicable to all types of workplaces, yet allow for specifics that are important in particular industries or occupations.

The Accreditation Standard

There are many different standards or sets of requirements available for use in an OH&S accreditation program, including: OHSAS 18001, BSI 8800, ANSI Z10, the Health and Safety Associations' Management System Standards, the Canadian Standards Association CSA Z1000, the WSIB's Workwell, the Guidelines on Occupational Safety and Health Management Systems ILO-OSH 2001, and the Canadian Council on Health Services Accreditation.

After studying the most common and important features of international OH&S management systems, the Accreditation Working Group (AWG) proposes that Ontario's accreditation program should include provisions for all of the following fundamental OH&S management system elements:

- Leadership
- Responsibilities and accountabilities
- Hazard/risk assessment and control
- Safe work practices/procedures
- Emergency preparedness
- Training and communications
- Workplace inspections
- Accident/incident investigation
- Contracting
- Performance measurement, and
- Return to work.

See Appendix 3 for more information on the AWG report.

Recognizing that different sectors of Ontario's economy have different challenges and methods of addressing them, the AWG proposes that industry-specific guidelines be developed to provide more advice on specific features of the elements listed above.

Accreditation standards could promote an understanding of the qualities and practices known to be associated with successful health and safety outcomes even if some workplaces are not ready to participate in accreditation.

Variations in the Standard Requirements Might be Needed

It is widely recognized that the occupational health and safety capacity and needs of smaller and/or less experienced companies are different from those of larger or more established firms. It may be that standards designed for larger, more well-established firms, with more specialized health and safety resources, would be unduly onerous for small or less sophisticated firms.

It is suggested that standards be varied for small businesses. A balance could be struck by setting a standard that addresses the important and necessary precautions that all firms must satisfy, while at the same time allowing a level of achievement commensurate with individual firm size and capabilities.

It might be desirable to establish standards for different levels of accreditation. This would enable workplaces to achieve improvements in stages, which could appear more achievable than aiming for one major advance. A multi-level scheme could set a high standard to aim for, while not excluding workplaces that achieve an acceptable level of OH&S program development.

Models for this type of approach include schemes such as the ISO *Quality Assurance System*, which allows certification in planning and design alone, or in all operations of an enterprise. Different levels of participation and achievement have been designed into some Certificate of Recognition (COR) programs in Canada.

Variations in methods of achieving different levels of the accreditation standard could also be based on such program design factors as: length of time allowed to complete requirements; degree of difficulty; and the amount of resources available for investment in the accreditation process.

5.(c) QUESTIONS for the stakeholder:

- What elements or components of OH&S practice should be included in the accreditation standard and audit? What should be excluded?
- Should the standard and audit include industry specific requirements in addition to the core requirements?
- Should the accreditation program be tailored to the size of a business?
- Should it be a phased recognition program, taking into account the steps towards full recognition (i.e. application, pre-audit, post-audit, full recognition)?

What should be included in the Accreditation Audit?

It is proposed that the determination of whether employers have met the requirements for accreditation should be done through a workplace audit. This could be either a full audit or a verification audit, or perhaps both, to be used at different points in the process. The goal of the audit would be to examine how well the firm's policies, programs, practices and outcomes satisfy the standard. Workplaces would be able to perform self-audits before the formal accreditation audit takes place.

5. (c) QUESTIONS for the stakeholder:

- Should all elements in the accreditation audit tool be audited or a number of random elements selected as representative of the program?
- How should the audit be conducted? Should there be a pre-audit and a final audit or just a final audit?

Should there be Only One Audit or Should Others Be Accepted as Equivalent ?

Whether there should be only one acceptable audit to achieve OH&S accreditation, or whether a variety of audits could be considered equivalent and acceptable needs to be considered.

There is a wide variety of audits used to assess OH&S program, policies and practices. Examples include: -

- the Industrial Accident Prevention Association's (IAPA's) *Integrated Safety, Health & Environment Management System (IMS)*
- Ontario Forestry Safe Workplace Association's (OFSWA's) *Safe Workplace Ontario* audit
- the Workplace Safety and Insurance Board's (WSIB's) *WorkWell* audit
- the British Standards Institution 18000 Audit, and
- various other audits used by Ontario's Health and Safety Associations. *Please see the APPENDIX for examples of Health & Safety Association audit programs.*

Buy-in to accreditation might be more likely if multiple audits are accepted as equivalent to the accreditation standard. Audits could, therefore, be tailored to different sectors or other workplace characteristics.

An administrative process would be needed to approve audits as meeting the standard. Alternately, one standard audit may be more feasible from an administrative or quality control perspective.

5.(c) QUESTIONS for the stakeholder:

- Should superior performance be assessed on the basis of one accreditation audit tool or should the program allow other audits to be considered as equivalent?

Who should conduct the audit?

A major challenge in developing an accreditation program is designing a cost-effective model of program delivery and administration. It is assumed that there would be a minimum administrative function fulfilled by the WSIB, which holds the legal authority for setting accreditation standards and accrediting employers. But different parties could be responsible for conducting the workplace audits. Three options are suggested:

Option 1 - Audits Conducted only by the WSIB

This option might be appropriate if only one audit is accepted as measuring achievement of accreditation standard. It would simplify quality control and non-audit administrative costs, removing the need to recognize, monitor and assess multiple audits and audit organizations. It would, however, require the provision of significant resources by the WSIB.

Option 2 - Audits Conducted by Third Parties Approved by WSIB

The WSIB could approve third parties, such as the designated Health and Safety Associations, private consultants, or non-profit organizations, to conduct audits. While the WSIB would be responsible for the quality assurance aspects of the audit process, this option could reduce WSIB administrative costs related to conducting the audit.

A major consideration with this second option would be a concern for consistency of content and process, particularly as applied to audits that are decisive milestones for initial accreditation and renewal purposes.

Option 3 - Combination Audits

Audits may be conducted using a combination of the above two options.

Alignment of WSIB Incentive Programs with Accreditation

Accreditation could serve to integrate existing WSIB incentive programs, as a logical next step in their evolution. A 2006 program review of Safety Group graduates indicates the longer the participation in Safety Groups, the more positive the results. A Value-for-Money audit of Safety Groups recommended that the Program be expanded and evolve into an accreditation/ certification program. Accreditation could provide Safety Group graduate firms the opportunity to sustain their programs and progress to the next level in OH&S performance.

Allocating the Costs of Program Delivery

There are three general options for handling the costs of administering an accreditation program: assign costs to their WSIB premiums, charge workplaces directly for the costs of their accreditation, or a combination of both. A variety of options have been used in other jurisdictions.

5. (c) QUESTIONS for the stakeholder:

- Should audits be conducted by the WSIB or third parties approved by the WSIB or a combination of the two?

5.(d) Should the Program Target Specific Sectors or Groups?

A decision to be faced is whether to implement accreditation universally or to target the program to selected groups. The Accreditation Working Group suggests that implementation of the accreditation process be staggered, that is, implemented in stages, initially identifying select groups prior to a broad promotion to all workplaces.

A limited implementation of accreditation in selected workplaces would enable the WSIB to test the concept and to direct resources at highest priorities

5. (d) QUESTIONS for the stakeholder:

- Should the WSIB invite specific groups to participate in the pilot or should it be an open process?
- Would your organization or workplace be interested in participating in a pilot of the Accreditation program?

6. THE SUGGESTED MODEL FOR ONTARIO'S ACCREDITATION PROGRAM

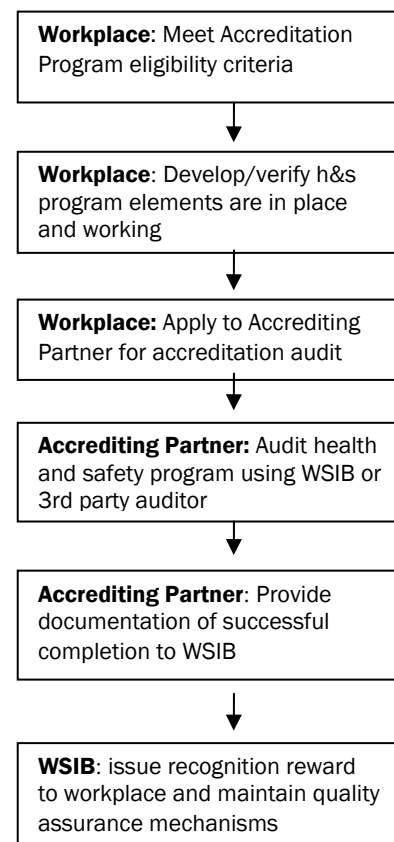
A proposed model for the Accreditation program based on the guiding principles (Section 4, page 7) appears below. Please provide your comments on it

Accreditation Program Roles	
WSIB	<ul style="list-style-type: none"> • Set accreditation program standards • Approve Accrediting Partners • Issue recognition reward • Quality control
Accrediting Partners	<ul style="list-style-type: none"> • Administer & maintain process • Oversee auditors • Market and promote accreditation
Auditors	<ul style="list-style-type: none"> • Conduct workplace audits • Comply with WSIB auditor standard (competency)
Workplace Parties	<ul style="list-style-type: none"> • Develop programs • Train internal auditors to maintain process • Demonstrate superior performance

Accreditation Program Elements

- Eligibility criteria (e.g. be registered with WSIB and be in good standing; no conditions respecting past performance)
- Certificate of Recognition /Reward for superior health and safety program valid for 3 year period (e.g. if documented program meets the standard, the workplace could receive certificate of recognition; if program meets the standard plus demonstrated good health and safety performance the workplace could receive an additional financial incentive)
- Audits done by 3rd party
- Program supported by:
 - Program standard
 - Audit tool
 - Program guidelines
 - Training
- Equivalency criteria to recognize achievement in other comparable programs and to facilitate sector specific needs
- Accreditation revocation criteria
- Quality Control mechanisms for ensuring financial sustainability, credibility (demonstrated through an audit process) and validity (outcome based)
- Pilot Program in 2007

The Accreditation Process



APPENDIX 1: WSIB PREVENTION MANDATE

Functions of the Board:

Part II, Injury and Disease Prevention, Workplace Safety & Insurance Act

4. (1) In order to promote health and safety in workplaces and to prevent and reduce the occurrence of workplace injuries and occupational diseases, the Board's functions include the following:

1. To promote public awareness of occupational health and safety.
2. To educate employers, workers and other persons about occupational health and safety.
3. To foster a commitment to occupational health and safety among employers, workers and others.
4. To develop standards for the certification of persons who are required to be certified for the purposes of the *Occupational Health and Safety Act* and to approve training programs for certification.
5. To certify persons who meet the standards.
6. **To develop standards for the accreditation of employers who adopt health and safety policies and operate successful health and safety programs.**
7. **To accredit employers who meet the standards.**
8. To designate safe workplace associations, to designate medical clinics and training centres specializing in occupational health and safety matters and to oversee their operation and make grants or provide funds to them.
9. To provide funding for occupational health and safety research.
10. To develop standards for training about first aid and to provide funding to those offering such training.
11. To advise the Minister on matters relating to occupational health and safety that are referred to the Board or brought to its attention.

APPENDIX 2: EXAMPLES OF HEALTH & SAFETY ASSOCIATION AUDIT PROGRAMS

Ontario Health and Safety Association (HSAs) OH&S Audits and Audit Programs

The majority of HSAs in Ontario have developed, or are in the process of developing, comprehensive sector-specific health and safety audit programs. Some HSAs are including audit elements that address the specific hazards and risks characteristic of their industries. Audit terminology varies among the HSAs with some referred to as “needs assessment”, “baseline assessment”, or “compliance benchmark”.

- The **Construction Safety Association (CSAO)** released a new draft audit containing 15 elements. An experienced auditor in consultation with a firm’s senior manager and safety coordinator, conducts the audit.
- The **Education Safety Association (ESAO)** uses the WSIB’s Workwell audit.
- The **Electrical & Utilities Safety Association (EUSA)** developed “ZeroQuest”.
- The **Farm Safety Association (FSA)** is operating a program, “Agricultural Safety Audit Program” (ASAP) which addresses both small and large operations. The ASAP is a voluntary self-assessment tool.
- The **Ontario Safety Association for Community & Healthcare (OSACH)** is developing a new Infection Control Audit Resource Document.
- The **Industrial Accident Prevention Association (IAPA)** offers the Integrated Safety, Health and Environment Management System (IMS) which is a continual management improvement system.
- The **Mines & Aggregates Safety & Health Association (MASHA)** offers the Internal Responsibility System Audit and the Mining Industry Safety and Health Audit.
- The **Municipal Health & Safety Association (MHSAO)** offers a Management Systems Audit, conducted by MHSA auditors.
- The **Ontario Forestry Safe Workplace Association (OFSWA)** launched the Safe Workplace Ontario – Sawmill Sector Program in 1997. This is a certification program.
- The **Pulp & Paper Health and Safety Association (PPHSA)** offers a needs assessment and identification, a legislative compliance audit, health and safety systems audit, and an ergonomic audit.

APPENDIX 3: THE ACCREDITATION WORKING GROUP'S EXECUTIVE SUMMARY, PROPOSED ELEMENTS OF A HEALTH AND SAFETY ACCREDITATION PROGRAM, GUIDING PRINCIPLES AND RECOMMENDATIONS

EXECUTIVE SUMMARY

General

The Workplace Safety and Insurance Board (WSIB) of Ontario plays “a key role in the province’s occupational health and safety system...and is committed to the prevention of workplace injury and illness³.” Part of the legislation under which it operates includes the provision for the development of an accreditation program for employers. No such program is currently developed.

Purpose of Accreditation

Employers have a legal, ethical and moral responsibility to provide a safe and healthy workplace. A Health and Safety management system forms the foundation of being able to fulfill those responsibilities and prevent injuries and illnesses in the workplace. For the system to be effective it must be integrated in a visible way with all business decision making processes. There is a growing belief that a world class Health and Safety management system supports better business results.

The Accreditation program, when developed, will be the first Health and Safety management system standard formally recognized by the Province of Ontario and will be a primary building block for future prevention initiatives.

This proposal describes a program that could be utilized by corporate entities (both private and public) as a means of establishing a method of recognizing the current state of a company’s health and safety management system.

The selection and eligibility of companies would be limited to those that are registered with the WSIB.

Involvement in the WSIB Health and Safety Accreditation Program is to be voluntary.

Provisions be made for the involvement of all of the major stakeholders in Ontario’s health and safety community, including employers, labour, certified committee members, health and safety representatives, health and safety associations, public sector groups and private sector individuals and groups, in the accreditation process.

³ WSIB News Release 31 May 2004, Toronto.

Management System Elements and Equivalency

The management system elements used in this proposal follow system protocols that parallel national or international elements. In particular, the process models of the Alberta Partners in Injury Prevention (COR), OHSAS 18001 and Guidelines on Occupational Safety and Health Management System ILO – OSH 2001 are referenced.

Equivalency procedures to accept other protocols would be created to allow for current Occupational Health and Safety (OHS) systems that include a managed system approaches.

Performance Recognition

One of the primary purposes of the proposed accreditation model is to recognize employers or companies that have successful health and safety programs and to encourage other workplaces to achieve similar results. The recognition must be meaningful to high performing organizations. It should also encourage others to strive to achieve higher levels. The recognition may take many forms, including but not limited to performance incentives based on financial considerations by the WSIB and the company.

The Province of Alberta has designed and is operating a successful “accreditation” like program and a meaningful recognition process that should be considered by the WSIB.

Elements of a Health and Safety Accreditation Program

There are many different standards or sets of requirements available for use in a Health and Safety Accreditation Program. These include OHSAS 18001, BSI 8800, ANSI Z10, WSIB Workwell, the Certificate of Recognition programs in Alberta, Nova Scotia, and British Columbia, the recently proposed CSA Z1000 standard, Health and Safety Association (HSA) H&S Management system standards, the Guidelines on Occupational Safety and Health Management System ILO – OSH 2001 and the Canadian Council on Health Services Accreditation.

Although each of these varies in some of the details and some are more prescriptive than others, there are many elements which are common to most or all of them.

The proposed accreditation program in Ontario should include provisions for the following elements and embody the guiding principles described below.

Recognizing that different sectors of Ontario’s economy have different challenges and methods of addressing them, the Accreditation Working Group (AWG) proposes that industry-specific guidelines be developed to provide more advice on specific features of the elements described below. Some industry sectors may have features that may be well addressed by the inclusion of more specific requirements and a more “prescriptive” type of program. For those where more flexibility is supportable, some additional industry-specific guidance on how to achieve a “performance” level would be provided in those guidelines.

H&S Management System Elements	Content/Processes/Comments
Leadership	<ul style="list-style-type: none"> ○ H&S policy statement ○ Management commitment to H&S ○ Active role in H&S activities ○ Lead by example
Responsibilities and Accountabilities	<ul style="list-style-type: none"> ○ General and specific responsibilities should be set out for all levels including CEO, Managers, Supervisors & Workers ○ Include H&S performance measures in general performance reviews for all supervisors/managers
Hazard/Risk Assessment and Control	<ul style="list-style-type: none"> ○ Review the hazards/risks that may be encountered in the scope of work performed by the company ○ Ensure that major fatality, injury or occupational illness risk factors that are prevalent in the business sector served by the firm are addressed ○ Establish effective controls for common risks ○ Establish effective control strategy for dealing with unexpected risks ○ Link H&S practices with other company practices
Safe Work Practices/Procedures	<ul style="list-style-type: none"> ○ Develop and implement effective practices and procedures to address risk factors ○ Ensure practices/procedures are communicated effectively to all affected employees ○ Establish “Company Rules” to address common H&S risks/controls and ensure that these are communicated effectively to all employees
Emergency Preparedness	<ul style="list-style-type: none"> ○ Develop and implement effective measures to deal with emergencies that may arise within the company’s scope of work ○ Complexity of preparedness plans may range from addressing First Aid requirements to more sophisticated requirements depending on the scope of work normally performed, site conditions, work location and availability of external emergency services.
Training and Communications	<ul style="list-style-type: none"> ○ Ensure that managers, supervisors and workers are trained in accordance with the requirements of the company’s H&S program, as well as applicable legislated requirements ○ Ensure that H&S information is communicated effectively throughout the company (including but not limited to safe work procedures, MSDS’s, H&S bulletins)
Workplace inspections	<ul style="list-style-type: none"> ○ Ensure that H&S inspections are conducted regularly, by competent persons, and that any deficiencies are recorded as well as the corrective action taken.
Accident/ Incident Investigation	<ul style="list-style-type: none"> ○ Ensure that there is an effective system in place to report and investigate accidents/incidents. ○ Ensure that persons investigating these events have been trained in accident/incident investigation ○ Ensure that the results of the investigation and any corrective actions are recorded and communicated to all appropriate parts of the company.
Contracting	<ul style="list-style-type: none"> ○ Ensure that contractors are qualified to perform the work safely and that contractors have taken appropriate measures to perform to your company’s H&S requirements ○ Establish H&S performance expectations for contractors
Performance Measurement	<ul style="list-style-type: none"> ○ Ensure that there are measures to evaluate the company’s H&S performance and internal compliance with the its H&S program

	<p>requirements</p> <ul style="list-style-type: none"> ○ Provide for periodic external validation of internal audits.
Return to Work	<ul style="list-style-type: none"> ○ Ensure that the company has policies and practices (e.g. modified work, early medical intervention, and regular communications) in place to assist with safe return to work for injured workers. <i>(Note: Although disability management is not considered in many H&S programs or OH&S standards, it is a key focus area for the WSIB.)</i>

Guiding Principles

In addition to these elements, some **guiding principles** should be embodied within the company's H&S program:

- **Build Health and Safety into Everyday Business** – do not treat it as something separate from the work; rather, treat H&S as part of everything the company does.
- **Lead by Example** – All levels of supervision and management must consistently demonstrate their support for the H&S program.
- **Worker Involvement** – Observations, suggestions and comments from workers can enhance many different aspects of a firm's H&S program. A good working labour/management environment is essential for effective H&S systems.
- **Comply with Regulatory Requirements** –. Compliance with applicable regulations is a minimum level of performance. Accredited employers are expected to exceed the minimum legal requirements.
- **Continual Improvement** – H&S programs should not be viewed as static programs. Companies should be looking to continually improve their H&S performance as they evolve and circumstances change (e.g. their scope of business, standards and regulations, equipment and materials, industry practices)
- **Hazard Control** – The control of hazards should be based on elimination or reduction of risk through process/tool or material changes (engineering controls) rather than relying primarily on the use of Personal Protective Equipment. The use of personal safety equipment should normally be considered the last choice of control options.
- **Address Occupational Health Impacts** – Although the degree of importance will vary with the nature and scope of work normally conducted, risks from exposure to hazardous materials (asbestos, silica, lead, solvents, welding fumes etc), hazardous energy (noise, vibration, UV, X-Rays, Gamma Rays etc) or biological agents (HIV, SARS, Avian Flu, Hepatitis etc) should be addressed as part of the company's H&S program.

ACCREDITATION WORKING GROUP RECOMMENDATIONS

- That the WSIB engage in a broad based consultation process to develop a Accreditation program
- That the Accreditation Program be developed based on the recommendations and program principles.
- That the program be a voluntary program and that the elements along with the associated guiding principles be adopted as the foundation for the program.
- That the program and audit process be performance based.
- That a list of existing association, national, and international standards be developed and recognized as being equivalent to the accreditation standard.
- That WSIB programs, such as Workwell and Safety Groups align their H&S management system components to match the Accreditation program elements.
- That historical health and safety performance metrics not be a barrier to a company applying to be accredited.
- That accredited companies be eligible to receive additional meaningful recognition based on actual trailing indicator performance levels.
- That a detailed audit process be developed by the WSIB with stakeholder input and to determine in part what, if any, H&S performance metrics will be considered in the audit process.
- That if an accredited company has a fatality or critical injury their accreditation could be reviewed but will not result in automatic revocation of the COR.
- That the WSIB provide meaningful financial and other forms of recognition to companies that have successfully implemented a performance-based health and safety management system that meets the requirements of the Accreditation program, starting with an appropriate level of incentive when companies achieve their COR.
- That the MOL engage in a consultation process with stakeholders to develop a meaningful recognition process for high performers.
- That the WSIB will be responsible for the administration of the detailed Accreditation Program and successful applicants will be issued a “Certificate of Recognition” (COR) from the WSIB.
- That the Accreditation Program will be guided by a multi-stakeholder committee which shall advise the WSIB of recommended changes to the program.
- That any self assessment process undertaken by a potential COR applicant shall be at the applicant’s expense and will involve the workplace parties, which would include the Joint Health and Safety Committee. WSIB will make available either directly or through the HSAs the necessary information to allow an applicant to conduct the self assessment.
- That application for accreditation will be submitted to the WSIB for consideration.
- That CORs will be effective for a 3 year period, unless otherwise revoked by the WSIB.
- That the WSIB will identify the appropriate HSA or other approved evaluators and request evaluation to be conducted.
- That HSAs are to have been pre-qualified and determined by the WSIB to be competent to conduct the COR evaluation process. The WSIB will “license” individuals within the HSA to be evaluators or will recognize equivalent licensing processes.
- That if an applicant has submitted the application and evidence that they have undergone an independent Third Party (deemed competent by the WSIB) evaluation that meets the WSIB accreditation criteria., the WSIB (in consultation with the MOL) will accept the evidence and issue the COR.
- That the cost for the COR evaluation process will be market driven and borne by the applicant.

APPENDIX 4: EVIDENCE & INFORMATION FROM OTHER PROGRAMS

The WSIB has reviewed various accreditation/recognition programs in Canada and abroad, focussing on six areas:

- Occupational health and safety (OH&S) recognition programs in Canada, including those known as COR or Certificate of Recognition programs
- Ontario Health and Safety Association (HSA) OH&S audits and audit programs
- OH&S management systems
- OH&S recognition programs in other countries
- Health-related accreditation programs
- National Quality Institute (NQI) programs in Canada.

The WSIB's jurisdictional review found that a wide array of accreditation and/or recognition programs exist. The effectiveness of these programs in contributing to improved health and safety outcomes is not absolutely clear. Generally, they form only one component of a jurisdiction's health and safety strategy. Overall, these programs appear to have increased employer awareness surrounding the benefits of good health and safety practices from an economic and social perspective.

The following section presents an overview of findings and information on some of the programs included in the review .

Evidence of Success from Other Canadian Programs

Five provinces have some form of occupational health and safety Certificate of Recognition (COR) program: Alberta, British Columbia, Manitoba, Nova Scotia, and Saskatchewan. The Alberta, Manitoba, and Nova Scotia programs have been in operation for several years. The British Columbia and Saskatchewan programs are relatively new. Financial incentives appear to be a major component of COR programs.

Alberta

In the Alberta *Certificate of Recognition (COR) program, Partners in Injury Reduction (PIR)*, over 4,000 firms and 10 industrial areas are represented. Many larger firms require "pre-qualification" of contractors. The 2003 evaluation report of PIR, based on 1200 interviews, recommended the program should target larger, more high risk firms with poor performance, and make the audit process easier. Major challenges centred on providing quality assurance and training auditors. The evaluation report said "emphasis should be on increasing awareness of workplace safety in the province, rather than just growing the number of CORs involved with the program". There is evidence that firms in the COR from 2000 to 2004 had a 14-day decrease in return to work times, on average. In addition, 2004 participants had almost 7% fewer LTI's than non-participants.

The Alberta program began in 1993 and operates in partnership with Alberta Human Resources and Employment. The program is open to all WCB account employers. To qualify for PIR, employers must develop and implement an acceptable "health and safety management system" and pass an external audit to earn the COR. PIR firms may qualify for discounts of up to 20% of their premiums, over and above their experience rating.

British Columbia

Work Safe BC conducted a pilot of their COR program with three employer groups from 2002 to 2005. Employers in Road Construction and Maintenance, Oil and Gas, and the construction industry achieved COR certification by the end of the pilot in 2005. During the pilot, firms could receive a 5% rebate off their base Work Safe BC rate. Work Safe BC's Partners Program received approval by their Board of Directors to become an ongoing program in 2006. COR has begun to spread into other sectors such as Forestry.

Manitoba

The Workers Compensation Board of Manitoba announced an Incentive Plan in Construction as a pilot program. It includes a 5% reduction in WCB assessment rates for construction firms that earn safety association accreditation. Safety accreditation is offered by the Manitoba Heavy Construction Association's Safety Health and Environment Program and the Construction Safety Association of Manitoba. The Manitoba Construction Association's Safety Accreditation Program has been in operation since 1991.

Large accredited employers receive a Certificate of Recognition from their respective safety association while smaller employers receive either the Small Employer Certificate of Recognition or the Small Business Safety Certificate.

The three-year pilot program begins in January, 2007. It is funded by a nominal increase in the surcharge paid by all construction employers in Manitoba.

Nova Scotia

The Workers' Compensation Board of Nova Scotia recognizes employers who have put health and safety systems in place and taken the extra step of having their workplace audited by one of the recognized audit firms. Upon request of the audit provider, Prevention Services at the WCB reviews audits against established criteria and endorses those audits that meet all of the requirements.

In some cases, the Government of Nova Scotia, and others, insists on potential suppliers having a Certificate of Recognition before they are eligible to bid on contracts. The WCB does not offer a rebate or financial incentive at this time.

Saskatchewan

The Saskatchewan Workers' Compensation Board, in their review of 2006 premium rates, deferred the second phase of their three year implementation plan for the Experience Rating Program and directed more work to be done on a proposed certificate of recognition for safe workplaces. A committee is working on promotion and development of the certification process in anticipation of re-introducing the concept in 2007/08.

Examples of Recognition Programs in Other Countries

The experience of OH&S recognition programs in Australia, Denmark, New Zealand, the United Kingdom, and the United States were reviewed. These programs appear to have been successful in targeting purchasing/supplier behaviour with respect to large projects

Australia

The Australian Ministry for Employment and Workplace Relations implemented the *Building and Construction Industry Improvement (Accreditation Scheme) Amendment Regulations 2006 (No.2)*. Under the legislation, there are requirements for Australian Government agencies to only contract with accredited contractors.

The Australian National Minerals Industry Excellence Awards for Safety and Health (MINEX) publicly recognizes best practices and/or improvements based on comparisons of performance and practices. The program has been in operation since 1995.

United Kingdom

Since 1997, The Contractors' Health and Safety (CHAS) Assessment Scheme has been in place in the United Kingdom. Accreditation of applicant companies is entry into the CHAS database which shows that they have achieved CHAS standards. It is designed for use as a tool in the selection of contractors who apply for the public-sector organisations' approved list of contractors. Assessment includes reviewing a company's health and safety culture, CHAS assessors make sure they meet standards set by the 1974 Health and Safety at Work etc Act. (And the new Construction (Design and Management) Regulations to be introduced in 2007. Assessors will check they are following guidance issued by both the Health and Safety Executive and the Health and Safety Commission. Reviews are conducted every 18 months. The quality control process includes checking between 5 to 7% of the approved applications.

Denmark

Enterprises with a particularly safe and healthy working environment can obtain a health and safety certificate. There are two models that can be used by the employer to obtain the certificate – Accredited Inspection or Accredited certification of the management system. Certificates are issued for up to three years. In order to obtain the certificate, the employer must meet statutory health and safety requirements and therefore the Danish Working Environment Authority will visit these organizations only when needed.

Accreditation is completed through application for inspection/certification from an accredited body. These accredited bodies have requirements they must fulfill and are quality controlled. The accrediting body issues the health and safety certificate if the requirements are met.

Netherlands and Belgium

Since 1994, the Netherlands has developed a voluntary third-party certification system to objectively evaluate a contractor's safety, health and the environment program. The program entitled SCC stands for SHE Checklist Contractors and is a checklist comprised of an extensive questionnaire. Petrochemical clients contracting out high-risk work to contractors require the certification from the contractors as it assures them that contractors have a high level of health and safety as the certification is conducted by an independent recognized certification body. In order to obtain certification, the contractor must pass the checklist which includes the management system and good health and safety performance. Although the certification is valid for three years, audits are conducted annually.

The SCC scheme has also been introduced in Germany and has been adopted by other industries in addition to the petro-chemical field.

USA

The Voluntary Protection Program (VPP) began in 1982 and emphasizes improving safety, health and environment management by prevention measures going beyond regulatory requirements. OSHA's VPP sets performance-based criteria for a managed safety and health system, invites sites to apply, and then assesses applicants against these criteria. OSHA's verification includes an application review and a rigorous onsite evaluation by a team of OSHA safety and health experts. Sites must submit annual self-evaluations and undergo periodic onsites re-evaluations to remain in the program.

Recognition/Accreditation-Type Programs that Already Exist in Ontario

The following are only a few examples of the different types of OH&S recognition and certification-type programs that involve employers in Ontario. They range from awards programs to mandatory contractor certification.

SWO / OFSWA

In 1997 the Ontario Forestry *Safe Workplace Association* (OFSWA) started the “Safe Workplace Ontario” (SWO) Certification Program with the sawmill sector, and expanded it to include the veneer/plywood and other board industries. Later it was applied to conventional and mechanical logging sectors. The intended purpose of the SWO was to motivate self-reliance and commitment to injury prevention through effective OH&S programs. Special attention was focused on “priority firms”.

Electrical Utilities Safety Association (EUSA)

The Electrical & Utilities Safety Association (EUSA) developed the “ZeroQuest” program, which is a comprehensive approach to building a managed health and safety system, with the ability to test that system against a standard. The two components to the program are ZeroQuest Paths to Zero model for change and the ZeroQuest award program.

The Sarnia Lambton Industrial Educational Cooperative:

SLIEC trains contractors as part of a market-driven mandatory requirement of large companies in the Sarnia-Lambton industrial complex. Nineteen firms in the petrochemical and industrial sector have formed a partnership with supplier firms, establishing requirements for health and safety practices and training for firms contracting to provide construction and other services.