Element 2: Hazard Identification and Control



COR Toolkit:

An Employer Guide to COR Certification



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OVERVIEW

A method to identify and control workplace hazards is important in order to eliminate, minimize or prevent unsafe or harmful conditions and work procedures. All jobs, equipment, machinery, worker activities and on-site conditions need to be included in the hazard-recognition process. The audit will measure if the company has implemented:

- A risk rating system to analyze jobs, equipment and conditions for potential hazards. This should be
 done overall once when building the system and then partially any time there is a change in a job, a
 piece of equipment or working conditions.
- A method to control the workplace hazards by
 - Engineering controls proper use of controls, such as power machinery instead of manual lifting by workers, and availability of standardized engineering controls.
 - Administrative controls including having workers follow written safe work procedures for hazardous jobs, plus management enforcement of these practices.
 - Personal protective equipment (PPE) controls including availability, training and maintenance
 of PPE, such as gloves, and enforcement of its use, where appropriate.
- A method to communicate the risk assessment and the control procedures to workers and ensure that the controls are used.

KEY CONCEPTS AND IMPLEMENTATION TIPS

In order to meet the above objectives, the audit checks whether:

- The employer performs hazard/risk assessments at the worksite.
- Employees participate in the hazard/risk assessment, since they are the ones most affected by hazards and risks.
- People assessing the risk are adequately qualified to do so. A qualified individual is someone who is knowledgeable about the work, the hazards involved and the means to control the hazards. This qualification can be earned through education, training or experience, or a combination of these things.
- Once hazards have been identified, they are prioritized and controls are implemented to manage them.
- There is a process to review the effectiveness of the controls once they have been implemented.
- When operations change or new procedures are added, an assessment of the change is performed.
- Supervisors check that workers follow the safety procedures, providing coaching and corrective feedback, where necessary.
- The employer has a written discipline policy when coaching and correction are not working.
- Employees have a method of reporting unsafe conditions, hazards or problematic activities and understand the process for refusing unsafe work.
- Employees are trained in the hazards and controls that affect them and how to report problems.
- Training is documented.





RELEVANT REGULATION AND LEGISLATION

Searchable versions of the Occupational Health and Safety (OHS) Regulation and the *Workers Compensation Act* are available online at https://link.go2hr.ca/cor-E1-001.

Occupational Health and Safety Regulation (WorkSafeBC)

Reporting Unsafe Conditions — Section 3.10

Refusal of Unsafe Work — Section 3.12

Personal Protective Clothing and Equipment — Part 8

Workers Compensation Act (BC Gov't)

General duties of employers, workers and supervisors — Sections 21–23

GUIDELINES FOR USING THE COR AUDIT TOOL

Question 2.1

Is there a process to analyze jobs, equipment and conditions for hazards according to risk?

Auditor Guideline

Review documentation to ensure there is a process/policy for identifying and assessing hazards in the workplace.

Employer Guideline

Provide a written policy and process for hazard identification and risk assessment that identifies the tasks within all departments, breaks down the tasks for each hazard and describes how risks will be controlled. Each risk needs to show that it has been analyzed for frequency of exposure, potential consequences and hazard probability. These three combined provide a risk rating (low, medium or high risk and up to multi-point scales). The controls need to use the order of:

- 1. Eliminating the hazard.
- 2. Engineering controls.
- 3. Administrative controls.
- 4. PPE.

Types of Documentation to Review

Hazard identification and risk assessment process or policy





Is the process to analyze risks outlined in Question 2.1 being followed?

Auditor Guideline

Review documentation (hazard/risk assessments) to determine if the process for identifying and assessing hazards in the workplace is being followed.

Employer Guideline

Provide documentation that proper hazard/risk assessment is complete for all positions and tasks, according to the method in question 2.1. The documents sampled need to be internally consistent and logical (i.e., sweeping the floor after hours is lower risk than dealing with an argumentative, impaired person). Questions 2.7, 2.8 and 2.13 use some of the sampled risk assessments for further examination.

Types of Documentation to Review

Job safety breakdowns, completed assessments

Possible Secondary Document Source

Area inspections (with risk assessment)

Question 2.3

Is there a process for reporting unsafe conditions?

Auditor Guideline

Review documentation for a formal or informal process (e.g., unsafe conditions report form or verbal reporting).

Employer Guideline

The process for reporting unsafe conditions is clearly identified, in writing, in a policy handbook form that outlines general rules and specific responsibilities.

Types of Documentation to Review

Policy on reporting, hazard report form, supervisor journal notes

Possible Secondary Document Source

Corrective action log, maintenance records





Do workers report unsafe conditions?

Auditor Guideline

Interview a representative number of workers to determine their understanding of the process.

Employer Guideline

This question aims to verify that workers understand the procedure or policy that guides their actions when reporting an unsafe condition. Do they know what to do? There is no audit requirement for workers to fill out a form, unless the company policy directs them to do so.

Question 2.5

Do qualified individuals participate in the hazard identification process?

Auditor Guideline

- Review documentation to confirm qualified individuals participate in the hazard identification process.
- Interview supervisors and workers to verify qualified individuals participate in the hazard identification process.

Employer Guideline

Employees involved in hazard/risk analysis must have received training in the process. This could be demonstrated by a certificate or some other record of training. Training can be done in house, but proof of completed training is still required. The questions posed to supervisors and workers are intended to show whether the people doing the risk assessments have received training to perform them adequately.

Types of Documentation to Review

Training records or certificates compared to people listed on hazard identification forms

Possible Secondary Document Source

Joint health and safety committee minutes





Are the hazard identifications, assessments and controls reviewed regularly?

Auditor Guideline

- Review documentation (hazard identification process/policy) to ensure hazards are reviewed as per the process/policy.
- Interview a representative number of supervisors and managers to determine if the process is reviewed.

Employer Guideline

This question requires a policy outlining how often risk assessments are reviewed and proof that the policy has been followed. This can be proven with creation and revision dates on the risk assessments, joint committee meeting minutes showing a review of the risk assessments, a safety schedule showing when the review is to be done and the resulting changes. To count positively in the audit, documents must be dated within the past two years (or more recently if the company policy requires more frequent review). Undated documents count as negative.

The interview is looking to verify that the hazards are reviewed at least every two years or when there is a change in processes, equipment or jobs. The interview evidence can still be fully positive even if there is no documentation evidence within this question.

Types of Documentation to Review:

Policy manual, work area inspections (with risk assessments), job safety breakdowns, job safety analysis, joint committee minutes, crew safety meeting minutes

Question 2.7

Are engineering controls identified in the hazard identification process available and being used?

Auditor Guideline

Observe a representative sample of engineering controls from the hazard identification process and verify they are available and being used or other effective controls are in place.

Employer Guideline

During the documentation review in question 2.2, auditors are looking at the risk assessments for engineering controls that have been put in place to control a hazard. The list is verified during the observation tour. The auditor should select at least three (preferably more) engineering controls that would reasonably be expected to have something observable (i.e., a railing added to a balcony rather than a wiring change inside a sealed electrical panel). The auditor should focus on significant or large controls where possible. There is no defined timeline for when the control was put in place. For example, railings added around a chair-lift cable wheel a decade ago due to a risk assessment when the lift was installed are still positive findings for a current audit if the railings are still present and in use.





Do workers work according to safe work procedures and job practices?

Auditor Guideline

Observe workers engaged in work activities for which safe work practices and job procedures have been developed.

Employer Guideline

During the documentation review in question 2.2, auditors are looking at the safe work procedures for specific details, such as the PPE required for a certain job and steps for performing jobs safely. During the observation tour, auditors verify that safe work procedures are being followed.

Question 2.9

Does the employer have a method to ensure compliance with the rules, safe work practices and job procedures? Is it being followed?

Auditor Guideline

- Review documentation for a method to ensure compliance.
- Interview managers, supervisors and workers to verify the application of compliance procedures.

Employer Guideline

This question is looking for a progressive discipline policy. Does the organization have a clear policy that shows what will happen if someone is not compliant with the health and safety program, and is the policy documented? Typical steps include coaching or education, verbal and written warnings, suspension and ultimately termination of employment. It is acceptable to have a policy where some offenses are more serious than others and have higher disciplinary penalties.

The interview seeks to determine if the discipline policy is used consistently. Interview evidence may still be fully positive even if the documentation is negative, provided all interviewees report a standard uniform method of discipline. Interviewees who are not aware of actual discipline having been needed but have a correct expectation that it would be used if necessary are considered to have provided positive responses.

Types of Documentation to Review:

Discipline policy

Note: Actual records of discipline being applied are confidential human resources documents and are NOT to be included in the audit process or report by internal or external auditors.





Are hazards and controls communicated to workers?

Auditor Guideline

Interview a representative number of workers to determine if they have been made aware of the hazards associated with their position.

Employer Guideline

This question asks workers to identify hazards that are part of their jobs. What kinds of things could hurt them in the course of their work, and do they know how to protect themselves? The auditor needs to have evaluated the hazard/risk assessment for the jobs applicable to the interview.

Question 2.11

Are employees who use PPE trained?

Auditor Guideline

Review documentation to verify formal or informal training.

Employer Guideline

Auditors are looking for current documentation of training that includes use of and care for PPE. Examples of acceptable documentation are training records, a spreadsheet that tracks training and shows that employees have been trained in the proper use of their PPE, or records demonstrating that specific PPE requirements have been reviewed in departmental meetings. While training records are preferred for ease of recall in future years, meeting minutes are equally acceptable for this question.

Types of Documentation to Review

Training records, training spreadsheets, crew safety meeting documentation





Is there a system to ensure employees wear appropriate PPE? Is it being followed?

Auditor Guideline

- Review documentation to determine if there is a system to ensure employees wear appropriate PPE.
- Observe use of PPE during site tour.

Employer Guideline

This question is looking for a policy or procedure that provides guidance to supervisors, managers and workers on their responsibilities regarding PPE training, usage, supply, maintenance and storage. The observation tour is done to see if workers are following the safe work procedure requirements for PPE for the tasks they are performing. Safety signage can be part of an effective system but cannot be the whole system. A policy or procedure is still needed to support the signage.

Types of Documentation to Review

PPE policy or manual, documented observations on use of PPE by supervisors and the joint committee

Possible Secondary Documentation

Signs, journal notes, inspections, log books, worker observations

Question 2.13

Is PPE identified in the hazard identification process available and being properly maintained?

Auditor Guideline

Observe a representative sample of PPE identified in the hazard identification process and verify it is available and being properly maintained.

Employer Guideline

On the observation tour, the auditor checks to see whether PPE listed in the safe work procedures is available and in good condition. PPE needs to be clean, dry, sanitary and uncontaminated (at least on the side that the employee touches). If gloves or footwear are designed to be non-slip, the grip or traction should not be worn off. Specialized PPE, such as cartridge respirators, fall protection equipment and some emergency response PPE, must have documentation of the correct maintenance when documentation is required by regulation or company policy.





SUPPORTING RESOURCES

Hazard Identification and Risk Assessment

What Is a Risk Assessment? (go2HR) https://link.go2hr.ca/cor-E2-004

Risk Assessment Tool for Accommodation, Food and Beverage, Recreation and Entertainment, Ski Areas, Transportation, and Travel Services (go2HR) https://link.go2hr.ca/cor-E2-005

Risk Assessment (CCOHS) https://link.go2hr.ca/cor-E2-006

Reporting Unsafe Conditions/Refusal of Unsafe Work

Right to Refuse Unsafe Work (WorkSafeBC) https://link.go2hr.ca/cor-E2-007

Getting a Job? Ask Questions about Safety (WorkSafeBC) https://link.go2hr.ca/cor-E2-008

Personal Protective Equipment

Personal Protective Equipment (PPE) (WorkSafeBC) https://link.go2hr.ca/cor-E2-009

Personal Protective Equipment (CCOHS) https://link.go2hr.ca/cor-E2-010





FORMS, POLICIES AND PROCEDURES

go2HR has sample forms, policies and procedures you may find helpful for developing your safety management system. You can download and modify the following Word documents to suit the specific needs of your operation:

- Hazard Identification, Risk Assessment and Control https://link.go2hr.ca/cor-E2-011
- Hazard and Unsafe Condition Reporting https://link.go2hr.ca/cor-E2-012
- Hazard Report Form https://link.go2hr.ca/cor-E2-013
- Corrective Action Log https://link.go2hr.ca/cor-E2-014
- Occupational Health and Safety Rules and Disciplinary Action https://link.go2hr.ca/cor-E2-015
- Personal Protective Equipment (PPE) https://link.go2hr.ca/cor-E2-016

