Element 3: Safe Work Procedures and Written Instruction



COR Toolkit:

An Employer Guide to COR Certification



safety@go2HR.ca www.go2HR.ca



OVERVIEW

Making safe work procedures and practices part of standard operating procedure may seem a matter of common sense, but in fact an effective occupational health and safety program for workers is required by the Occupational Health and Safety Regulation. Without a written standard to refer to, whether for making beds or wearing respirators, there is no consistent guidance for workers or supervisors. Measurement of these items in the audit will include written safe work procedures, practices and instructions, including the following:

- All routine and non-routine expected operations of the company.
- A workplace hazardous materials information system (WHMIS).
- Instructions that direct the first aid services, supplies and equipment to be provided and how employees receive them.
- Procedures addressing possible emergencies, training of workers in those procedures, testing their effectiveness, and evaluating and revising the procedures based on drills and actual emergencies.

The audit also measures whether the procedures are the right ones for the tasks the workers perform. The procedures need to flow from the risk assessments in the previous element of the audit to ensure that the procedures actually address the hazards of the job. As with other sections, communication and supervision are underlying themes. Workers need to be told the procedures, and supervisors need to coach the workers to help ensure that the work is done the right way the first time, every time.

KEY CONCEPTS AND IMPLEMENTATION TIPS

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

- The employer has safe work procedures based on the hazard/risk assessments done at the worksite.
- Employees participate in the hazard/risk assessment, since they are the ones most affected by the hazards and risks.
- There is a first aid assessment done for each site that the company operates.
- The company has appropriate first aid supplies, equipment, rooms and personnel.
- There is a procedure for workers to follow when they are injured (or observe an injury) and need first aid.
- There is a set of emergency response procedures appropriate to the company's activities and risks. Examples of risk factors include:
 - Blood-borne pathogens, fires, injuries, fatalities and natural disasters.
 - Workplace violence, working alone, wildlife encounters, crisis management, power failures, major equipment failures, major substance spills, robberies, assaults, bomb threats, car accidents and rescues from remote locations, heights or depths.





- Employees know their roles in the first aid and emergency response plan, whether they are responders, reporters or bystanders.
- Emergency drills are held annually to test whether the various response plans actually work for the company.
- The company has a WHMIS program.
- 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)

Written Instructions — <u>Section 3.3(c)</u>

Occupational First Aid— Sections 3.14–3.21

Emergency Preparedness and Response — Sections 4.13–4.16

WHMIS — Sections 5.3–5.19

Workers Compensation Act (BC Gov't)

Reporting Accidents — <u>Section 68</u>





GUIDELINES FOR USING THE COR AUDIT TOOL

Question 3.1

Have safe work practices and job procedures been written for the identified hazards as required?

Auditor Guideline

Review a representative sample of documentation (safe work practices/job procedures) and compare to hazard identification and assessment. The percentage cannot exceed the percentage scored in Question 2.2 (i.e., if only 50 percent of the assessments have been completed in Question 2.2, then 50 percent is the maximum that can be scored).

Employer Guideline

This question looks at the risk assessments completed for the company to see whether there are corresponding safe work procedures. If only a fraction of the risk assessments has been completed, the number of points available for this question is the same fraction. Without having a risk assessment, the company has no real way to determine whether the safe work procedure it has developed is actually appropriate for the job. It may or may not be.

Types of Documentation to Review

Safe work practices/job procedures

Question 3.2

Are qualified individuals involved in the development/maintenance of safe work practices and job procedures?

Auditor Guideline

Interview supervisors and workers identified in the safe work practices and job procedures to verify their involvement.

Employer Guideline

The question is designed to see whether workers and supervisors have been part of the process for reviewing or developing the safe work procedures (SWPs). It is not necessary for every worker performing a particular task to be involved in the development of SWPs, but at least one needs to have been. The auditor should look at the SWP document to determine who was involved and then seek out interviewees to support that outcome. If there is no documentation assigning names, then the auditor should attempt to determine if any worker was involved and, if possible, interview that worker. A manager's notebook can be an excellent supplement to a formal SWP.





Has a first aid assessment been completed for the site and the results implemented into a program?

Auditor Guideline

Review documentation to determine if a first aid assessment has been completed and that it outlines first aid services, supplies and equipment to be provided.

Employer Guideline

This process is a WorkSafeBC annual requirement. It assesses the requirements of your site and determines what first aid supplies, personnel and equipment are required based on the location and level of risk. The process must be completed and dated, indicating that it has been reviewed in the past year. A company may develop its own form, but the process of determining the correct level of attendants, equipment and services must be followed. Note that non-workers on the site are excluded from the personnel counts. While hospitality companies need to care for guest first aid in many cases, this is not the scope of the question. Note that for companies with more than one site, one assessment per site needs to be completed. Some companies may need multiple assessments for the same overall site — for example, at a ski resort it is not practical for a mountaintop injury to have first aid available only at the base. For companies with mobile crews, such as guide-outfitters, the crew needs an assessment as well.

Question 3.4

Are the first aid equipment and supplies available as required?

Auditor Guideline

Observe the condition and availability of first aid equipment and supplies.

Employer Guideline

The observation tour determines whether the first aid supplies, personnel, equipment and facilities that were identified in the first aid assessment meet the requirements. Kits should be clean, neat, organized and not contain expired or otherwise unsuitable contents. Eyewashes and showers should be clean and useful for treating contamination.





Do the employees know the procedure for obtaining first aid?

Auditor Guideline

Interview employees to verify knowledge of the procedure to obtain first aid services.

Employer Guideline

This question tests to see whether employees are aware of how to get help if they require first aid for themselves or for co-workers, and what procedures they would follow.

Question 3.6

Is there a procedure for rendering and reporting of first aid services?

Auditor Guideline

Review documentation (first aid procedures).

Employer Guideline

This requires a policy, procedure or guideline on how to get first aid and what the subsequent steps should be. Details could include how to get a worker to medical aid, what paperwork needs to be filled out, where the first aid stations are located, what supplies are available, who the on-duty first aid providers are, supervisor contact information and who needs to be notified.

Types of Documentation to Review

First aid procedure, medical aid procedure





Are there written emergency response plans? Is the emergency response plan readily available to all employees?

Auditor Guideline

- Review documentation (emergency response plans). Ensure that each plan is appropriate for the worksites
- Observe the location of the emergency response plan to ensure it is accessible to all staff.

Employer Guideline

Mandatory emergency response plans can include the risk of blood-borne pathogens, fires, injuries, fatalities and natural disasters. Depending on the company, other emergency response plans may be required to address workplace violence, working alone, wildlife encounters, crisis management, power failures, major equipment failures, major substance spills, robberies, assaults, bomb threats, car accidents and rescues from remote locations, heights or depths.

The entire plan in all its detail does not need to be instantly available to every worker, but key concepts do need to be posted, including some signage and information readily available in paper or electronic version. Hard copies of the master plan need to be readily accessible in case of power or computer failure.

Types of Documentation to Review

Emergency response plans

Question 3.8

Have all employees been made aware of the emergency response plans?

Auditor Guideline

Interview workers, supervisors and managers to verify training. This training could be during orientation or refresher training, department meetings, job-specific training or emergency response training.

Employer Guideline

This question aims to determine whether the employees know what the procedures are for an emergency, and if they understand their roles and responsibilities. Individual auditors ask different questions of each interviewee, but typically people should know what to do in the major types of emergency (e.g., fire or injury), especially where their meeting location is in an emergency and whether the plan requires them to do anything other than get to the meeting area.





Are emergency response plans evaluated to identify deficiencies and revise accordingly?

Auditor Guideline

- Review documentation (joint health and safety meeting minutes and emergency drill records) to ensure the effectiveness of the emergency response plan was reviewed and deficiencies were corrected.
- Interview supervisors and managers to verify there is a method to evaluate the effectiveness of the plan.

Employer Guideline

The company is required to have a documented emergency drill at least annually to test the plans in place. The auditor is looking to see that a drill happened and that a debriefing followed. If there was any corrective action required to tweak the plan or correct a procedure, the auditors are looking to see that it was documented. This documentation could be demonstrated in the joint committee meeting minutes, the minutes of a management meeting, a newsletter or even an email, depending on the company style.

Question 3.10

Does the organization have a workplace hazardous materials information system (WHMIS) program?

Auditor Guideline

- Review documentation to ensure there is a WHMIS program and that responsibility for the program been assigned.
- Observe that the program is being followed. Ensure all elements have been successfully implemented, including labeling and signage.
- Interview a representative number of employees to determine if they are familiar with their responsibilities in the WHMIS program.

Employer Guideline

WHMIS must be reviewed annually. The company should have documentation that the review happened with the appropriate personnel, and that there is someone assigned to oversee this process. The auditor's observation tour includes looking at containers and noting if proper labeling has occurred, if there is appropriate signage available to guide workers in the use of chemicals and if the safety data sheets (SDSs) are readily available and current (no older than three years from issue date). The auditor's interview aims to determine whether the employees understand what is required of them in terms of labeling, handling and storing chemicals. The employee needs to be able to describe such key concepts as the hazards of the materials being handled, the appropriate precautions to avoid harm and, in the event of an emergency, the immediate actions that should be personally taken before the worker sees a first aid attendant.





SUPPORTING RESOURCES

Safe Work Procedures

Safe Work Procedures (Safe Work Manitoba) https://link.go2hr.ca/cor-E3-006

First Aid Assessment

First Aid Assessment Tool (AgSafe) https://link.go2hr.ca/cor-E3-007

First Aid Procedures

First Aid Requirements (WorkSafeBC) https://link.go2hr.ca/cor-E3-008

Emergency Response Plans

How to Prepare an Emergency Response Plan for Your Small Business (WorkSafeBC) https://link.go2hr.ca/cor-E3-009

WHMIS

WHMIS (WorkSafeBC) https://link.go2hr.ca/cor-E3-010

WHMIS 2015: At Work (WorkSafeBC) https://link.go2hr.ca/cor-E3-011

WHMIS 2015: General (CCOHS) https://link.go2hr.ca/cor-E3-012





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:

- First Aid Assessment Worksheet https://link.go2hr.ca/cor-E3-013
- First Aid Supplies Inventory https://link.go2hr.ca/cor-E3-014
- First Aid Attendants https://link.go2hr.ca/cor-E3-015
- Guide to Creating an Emergency Response Plan https://link.go2hr.ca/cor-E3-016
- Emergency Response https://link.go2hr.ca/cor-E3-017
- Workplace Hazardous Materials Information System (WHMIS) https://link.go2hr.ca/cor-E3-018

