

PRIVY COUNCIL OFFICE

**Audit of
Occupational Health and Safety**

Audit and Evaluation Division

Final Report
December 10, 2013

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Executive Summary

Authority

The Audit of Occupational Health and Safety was approved by the Clerk as part of Privy Council Office's (PCO's) 2011-2012 to 2013-2014 Risk-Based Audit Plan, for completion in 2013-2014.

Objectives

The overall objectives of the audit were: to assess the extent to which PCO occupational health and safety policies and procedures are aligned with federal legislation and government-wide requirements; and, to assess the effectiveness of the framework of controls over PCO's Occupational Health and Safety Program in contributing to a safe and healthy working environment for PCO personnel.

Scope

The scope of the audit included occupational health and safety authorities including the *Canada Labour Code*, Part II, the *Canada Occupational Health and Safety Regulations*, the *Treasury Board Policy on Occupational Health and Safety*, the *National Joint Council Occupational Health and Safety Directive* as well as the *PCO Occupational Health and Safety Policy* and related procedures. Our analysis included controls and practices in place to achieve and maintain consistency with relevant requirements and to monitor and report on PCO's Occupational Health and Safety Program and its activities. Further, we examined the governance structure established to enable strategic and operational oversight of the Program. The scope did not include an assessment of compliance with the above noted authorities.

The time period covered by the audit was April 2012 to October 2013; the start date corresponds to the official transfer of responsibility for managing the Occupational Health and Safety Program to Human Resources Division, Corporate Services Branch. Activities from April 2009 to March 2012, a period when the Program was managed by PCO's Security Operations Division, were considered for context, but do not form the basis of audit findings.

In terms of personnel, the scope primarily involved officials from Human Resources Division and members of PCO health and safety committees. This included roles, responsibilities and accountabilities of individuals with formal obligations for occupational health and safety, including training and/or information provided to enable them to perform their duties effectively.

The focus of the audit was on occupational health and safety as it relates to safe operations in the work environment. As such, we did not specifically examine physical security, building emergency operations or fire prevention programs, with the exception of how fire prevention assessment activities are considered in health and safety inspections and committee assessments.

Overall Conclusion

The PCO *Occupational Health and Safety Policy* and Program documentation generally meets the requirements of relevant federal legislation and government-wide policy. After a period of relative inactivity, the Program is being reinvigorated to achieve its objective of contributing to a safe and healthy working environment for PCO personnel. There is a need to strengthen several Program elements, the most significant of which are reactivating the network of health and safety committees and representatives, and updating key governance documents. Additionally, consistent standards for recording Occupational Health and Safety activities and regular reporting of Program results are required to enable effective management and oversight.

Summary of Findings

- In 2009, a comprehensive Occupational Health and Safety Program document was created that includes the PCO *Occupational Health and Safety Policy*, a description of the governance structure, and a strategic plan and logic model for the Program. Overall, this document is aligned with occupational health and safety requirements articulated in legislation and government-wide policy and mechanisms are in place to stay apprised of changes as they occur. Updates are required to the governance structure, including roles and responsibilities of key stakeholders to reflect the transfer of the Program to Human Resources Division, Corporate Services Branch.
- Mechanisms to gather data and report on adherence to relevant legislation and policy requirements did exist in the past, but these are not currently being used.
- PCO has two types of health and safety committees, as required by the *Canada Labour Code*, Part II; a departmental Health and Safety Policy Committee and multiple workplace health and safety committees.
- In 2013, the Health and Safety Policy Committee, which is intended to provide a department-wide focus for occupational health and safety issues was reactivated, having not met in 2012. While still a work in progress, they are well on their way to being a functional committee again.
- The network of workplace health and safety committees and representatives is not as active as it was in the past. Despite recent efforts by Program officials, there are membership gaps in nearly all eight of these workplace committees, meetings have not been held on a regular basis, and workplace inspections have only been conducted on a subset of floors in one location.
- A Program file management system is not in place to retain key documents, for example results from workplace inspections, when they are done. This is limiting the effectiveness of Program monitoring and Program officials' ability to track and implement workplace health and safety committee observations and recommendations.
- Interviews with health and safety committee members indicate they have operated with limited guidance since before the Program was transferred to Human Resources Division, and gaps exist in their understanding of the roles they are required to play with respect to occupational health and safety.

- The 2009 Occupational Health and Safety Program document outlined an overall training strategy for employees relative to their responsibilities, however, the strategy is not being implemented and the Program does not currently have the professional resources with the functional knowledge described in the framework.
- A procedure exists on the PCO occupational health and safety intranet site for incident reporting, which includes the involvement of a member of the local workplace and health and safety committee or health and safety representative as well as the Occupational Health and Safety Program official. In practice, however, individuals may be dealing with the issue independently without engaging the Program authorities.

Recommendations

We recommend that the Assistant Deputy Minister, Corporate Services Branch, as the primary senior manager responsible for the Occupational Health and Safety Program take overall responsibility for implementation of the following by Occupational Health and Safety Program officials in Human Resources Division:

1. *Secure workplace health and safety committee members and workplace health and safety representatives, as applicable, by: verifying the current roster of active committee members and representatives; and, leveraging senior management support to attract the required personnel to fill gaps that currently exist.*
2. *Centralize the collection and retention of key workplace health and safety committee documents to support Committee activities and regular reporting and analysis of occupational health and safety activities and events.*
3. *Update Program documentation to accurately describe the roles and responsibilities for key parties responsible for occupational health and safety, including health and safety committees and representatives, Program officials, and management in Corporate Services Branch and Security Operations Division. This would include ensuring that consistent terms of reference are approved for all workplace health and safety committees.*
4. *Update training programs and tailor training for individual roles and responsibilities within the Occupational Health and Safety Program. Training taken should be logged and monitored.*
5. *Develop mechanisms to collect and report on key activities, results, and trends to the Health and Safety Policy Committee as well as to senior management. This reporting should include adherence to relevant legislation and results of the Occupational Health and Safety Program. A mechanism should be developed to capture and analyze information obtained during regular occupational health and safety activities, such as workplace health and safety committee meetings and building inspections, and to prioritize key action items.*
6. *Strengthen communication between Program officials in Human Resources Division and workplace health and safety committees and health and safety representatives. There should be open communication between all parties on incidents being addressed in their respective areas and the status of actions taken in response to identified issues.*

Management Response

Management's response and action plan are included in Section 3.0 in the body of the report.

Statement of Conformance

In my professional opinion as Chief Audit Executive, this audit conforms with the Internal Auditing Standards for the Government of Canada, as supported by the results of PCO's quality assurance and improvement program.

Original signed by the Chief Audit Executive

SIGNATURE OF CHIEF AUDIT EXECUTIVE
JIM HAMER
DIRECTOR, AUDIT AND EVALUATION

1.0 Introduction

The Audit of Occupational Health and Safety was approved by the Clerk as part of PCO's Risk-Based Audit Plan for 2011-2012 to 2013-2014, for completion in 2013-2014.

1.1 Objectives

The overall objectives of the audit were: to assess the extent to which PCO occupational health and safety policies and procedures are aligned with federal legislation and government-wide requirements; and, to assess the effectiveness of the framework of controls over PCO's Occupational Health and Safety (OHS) Program in contributing to a safe and healthy working environment for PCO personnel.

1.2 Scope

The scope of the audit included occupational health and safety authorities including the *Canada Labour Code*, Part II, the *Canada Occupational Health and Safety Regulations*, the *Treasury Board Policy on Occupational Health and Safety*, the *National Joint Council Occupational Health and Safety Directive* as well as the *PCO Occupational Health and Safety Policy* and related procedures. Our analysis included controls and practices in place to achieve and maintain consistency with relevant requirements and to monitor and report on PCO's OHS Program and its activities. Further, we examined the governance structure established to enable strategic and operational oversight of the Program. The scope did not include an assessment of compliance with the above noted authorities.

The time period covered by the audit was April 2012 to October 2013; the start date corresponds to the official transfer of responsibility for managing the OHS Program to Human Resources Division, Corporate Services Branch. Activities from April 2009 to March 2012, a period when the Program was managed by PCO's Security Operations Division, were considered for context, but do not form the basis of audit findings.

In terms of personnel, the scope primarily involved officials from Human Resources Division (HRD) and members of PCO health and safety committees. This included roles, responsibilities and accountabilities of individuals with formal obligations for OHS, including training and/or information provided to enable them to perform their duties effectively.

The focus of the audit was on OHS as it relates to safe operations in the work environment. As such, we did not specifically examine physical security, building emergency operations or fire prevention programs, with the exception of how fire prevention assessment activities are considered in health and safety inspections and committee/ representative assessments.

1.3 Background

It is the policy of the federal government to provide employees with a safe and healthy working environment. The *Canada Labour Code*, Part II, outlines the legislative framework and the duties and responsibilities of the employer and employees pertaining to occupational health and safety. Each duty outlined in the *Canada Labour Code*, Part II, has a corresponding regulation prescribing specific requirements. Under the *Treasury Board Policy on Occupational Safety and Health*, departments must implement the requirements of the Code, maintain effective OHS

programs, and provide training and information to employees. The Policy has been designated by the Treasury Board as a key policy for the management of human resources.

The Clerk's commitment to occupational health and safety is stated in the PCO *Occupational Health and Safety Policy*. A key aspect of this commitment is positive leadership from management by demonstrating personal commitment to health and safety of all employees and an active interest and participation in the various OHS Program elements. Equally, each employee has an important role to play by attending to his/her own health and safety. As the PCO has personnel in many buildings with differing numbers of employees, uses, operations, and landlords, there is an inherent risk in managing health and safety hazards in all of the locations in accordance with relevant legislation. Not all employees are exposed to the same risks, which vary depending upon office location and individual job requirements, but exposures can include risks related to aging buildings, lifting and handling heavy equipment and materials, potential exposure to hazards in incoming mail, operating motor vehicles, and/or ergonomic issues.

The PCO OHS Program has experienced significant changes over the past few years. In April 2012, responsibility for managing the Program was transferred from the Security Operations Division to the HRD. One component of the Program, the fire prevention element, remained under the responsibility of Security Operations. Prior to this restructuring, a complete turnover of staff was experienced within the OHS Program. In addition to turnover and restructuring, workplace health and safety was identified as a high audit priority and added to PCO's Risk-Based Audit Plan in 2011 based on analysis conducted by Program officials.

1.4 Approach and Methodology

The audit began with a planning phase, conducted from July to September 2013, during which the audit team identified relevant risks to the achievement of the objectives and expected results of PCO's OHS Program. From these risks, the audit team established detailed audit criteria, which were primarily sourced from the Treasury Board Secretariat (TBS) reference document – *Audit Criteria related to the Management Accountability Framework: A Tool for Internal Auditors*. Criteria used for this audit are presented at Annex A. Prior to moving to the examination phase, the Chief Audit Executive communicated planning phase results with management and received their agreement with the audit criteria.

The audit examination phase, conducted in October 2013, consisted of a review of PCO's OHS policies and practices against relevant federal legislation and central agency requirements, interviews with PCO personnel with OHS responsibilities, as well as an examination of current OHS practices and reporting mechanisms. Our approach included the following:

- Examination and analysis of PCO OHS policies, procedures, and guidelines, and a comparison of these documents with relevant federal legislation and requirements;
- Examination of terms of reference and available meeting minutes from the past two years for workplace health and safety committees and the Health and Safety Policy Committee to assess the completeness, relevance, and timeliness of information discussed and reported through these committees;
- Examination of a sample of building inspection and Employment and Social Development Canada (HRSDC) – Labour Program reporting (e.g.: Workplace Committee Reports) completed for four PCO occupied buildings to assess completeness and timeliness of reporting, including identification and resolution of trends and issues;

- Interviews with members of workplace health and safety committees, the Health and Safety Policy Committee, Security Operations Division, and HRD to obtain clarification and further information regarding OHS policies, processes, and procedures, including monitoring and reporting controls;
- Review of HRSDC – Labour Program reporting completed by Human Resources Division (e.g.: the Employer’s Annual Hazardous Occurrence Report) for completeness and timeliness;
- Examination and analysis of a sample of tracking and reporting of accidents, incidents, complaints and refusals to work that have been captured since the transfer of OHS responsibilities to the Labour Relations Advisor (who was assigned to the Program in September 2013) to assess completeness and timeliness of issues identification and resolution;
- Examination of communication material on the PCO OHS intranet page and posted in four building locations visited to assess the quality and completeness of internal communications;
- Review of procedures for higher risk areas, such as operation of automobiles, management of hazardous materials (e.g.: mould), management of confined spaces, and safe lifting, for relevance, clarity, and consistency with requirements;
- Review of mechanisms used to plan and prioritize OHS activities and elements of the OHS Program; and
- Examination of job descriptions for positions within HRD with OHS responsibilities for completeness and clarity, including the Labour Relations Advisor; Manager, Labour Relations and Classification; and Director, Human Resources Operations.

In cases where OHS procedures and controls have not yet been defined, we inquired of HRD Program officials on their planned future course of action, including how they would be made aware of policy changes in relevant legislation and government-wide policy requirements, priorities and plans for the OHS program going forward including workplace health and safety committee recruitment, policy review, training, and progress reporting.

At the end of the examination phase, audit findings were discussed with management and a draft report was prepared and sent by the Chief Audit Executive to the Assistant Deputy Minister, Corporate Services Branch for response and development of an action plan to address audit recommendations. Draft audit reports and management action plans are provided to PCO’s Audit Committee for review and recommendation to the Clerk of the Privy Council for approval.

2.0 Conclusions, Findings, and Recommendations

Overall Conclusion

The PCO *Occupational Health and Safety Policy* and Program documentation generally meets the requirements of relevant federal legislation and government-wide policy. After a period of relative inactivity, the Program is being reinvigorated to achieve its objective of contributing to a safe and healthy working environment for PCO personnel. There is a need to strengthen several Program elements, the most significant of which are reactivating the network of health and safety committees and representatives, and updating key governance documents. Additionally, consistent standards for recording Occupational Health and Safety activities and regular reporting of Program results are required to enable effective management and oversight.

The following sections detail the audit findings and recommendations.

2.1 Legislative and Government-Wide Policy Requirements

PCO has a documented OHS policy framework that is generally aligned with relevant federal legislation and government-wide policy requirements and has mechanisms in place to stay apprised of changes as they occur.

In 2009, PCO produced a comprehensive OHS Program document that includes the PCO OHS Policy, a description of the governance structure, and a strategic plan and logic model for the Program. While the OHS Policy contains the majority of the information required by relevant authorities, other OHS requirements are addressed in the broader Program document (e.g.: contained in sample terms of reference for health and safety committees). The PCO OHS Policy and overall OHS Program document were last updated in April 2009, but there have been limited changes to the relevant legislation and government policy since that time.

We compared the PCO's OHS Policy and other components of the formal OHS Program document with relevant legislation, the Treasury Board Policy, and the National Joint Council Directive. Based on this comparison, we determined that PCO's Policy is generally aligned with the stated requirements. The Policy also includes a statement referencing the *Canada Labour Code*, Part II, the *Treasury Board Policy on Occupational Health and Safety*, and the *National Joint Council Occupational Health and Safety Directive*, which helps to ensure that the PCO Policy remains relevant should these authorities change.

Additionally, OHS Program officials in HRD recently implemented a process to monitor changes to applicable legislative and government-wide policy requirements in order to maintain consistency between the OHS Program document and these external authorities. The PCO Labour Relations Advisor, who is now working to refresh the Program, has established the necessary contacts and has access to information sources to stay informed of changes going forward by attending OHS Community of Practice meetings. Through the Community of Practice, PCO can provide comments on proposed policy amendments and is provided with regular updates on the status of any legislative changes.

Mechanisms to gather data and report on adherence to relevant legislation and policy requirements did exist in the past, but these are not currently being used. Monitoring and reporting completed by the former PCO OHS Group within Security Operations Division, between

2009 and 2011, included a gap analysis of PCO's OHS activities against legislative and policy requirements and preparation of an annual report to the Clerk and PCO senior management describing OHS accomplishments and plans. These types of documents are effective monitoring mechanisms, and should be reinstated along with other management reporting as described in section 2.5 below.

2.2 Processes and Procedures

PCO has documented OHS processes and procedures, although opportunities exist to update Program documentation and strengthen supporting procedures and structures.

Most available OHS Program information was created between 2009 and 2011, including the OHS Program document and communication and training material. The information on the PCO OHS intranet site has, for the most part, not been updated since the Program was transferred to HRD in April 2012. However, in reviewing original program documentation and procedures, the underlying OHS processes and procedures that have been established are sound and would, if fully implemented, enable PCO to adhere with relevant authoritative requirements.

2.2.1 OHS Committees and Representatives

PCO has two types of health and safety committees, as required by the *Canada Labour Code*, Part II; a departmental Health and Safety Policy Committee and multiple workplace health and safety committees. The foundation of OHS Program governance is a network of workplace health and safety committees and representatives¹. Although Program officials in HRD organize and coordinate the Program, they rely on the workplace health and safety committees and representatives to assess and provide information on operational OHS risks at PCO's various locations. By contrast, the role of the Health and Safety Policy Committee is to provide a department-wide focus for OHS issues that cannot be dealt with at the workplace level.

In 2013, the Health and Safety Policy Committee was reactivated, having not met in 2012. As part of this renewal, Committee members continue to be recruited, a new employer Co-Chair is expected to be appointed at the next meeting, and an updated terms of reference is to be approved. Within the Health and Safety Policy Committee membership there are individuals responsible for higher-risk operational areas, including the mail processing centre and records operations, as well as representation from Security Operations Division with responsibilities for the fire program.

Efforts in the current year to reinvigorate the Health and Safety Policy Committee have seen some success with new membership and regular meetings; however, further effort is needed to reinvigorate the workplace health and safety committees, as the committee network that was being established in the 2009-2011 period is not as active as it was in the past. There are membership gaps in nearly all of the eight workplace health and safety committees, as many former members are no longer at PCO and some that remain do not wish to continue to be involved. Since 2011, with limited exceptions, workplace health and safety committees meetings have not been held on a regular basis and workplace inspections have not been conducted for all locations.

¹ Workplace health and safety committees are established for buildings where there are 20 or more PCO employees; for buildings with fewer than 20 employees, a health and safety representative is appointed.

While PCO has been working to attract members to the workplace health and safety committees through open solicitations, this approach has had very limited success. There is a need to identify new methods to attract new members, including securing senior management support to encourage participation for representatives in higher risk areas, which is how many of the existing workplace health and safety committee members initially became involved with the Program. Management has identified an action plan to attract new committee members; however, attracting workplace health and safety representatives for the locations with less than 20 employees, to date, has not been part of that plan. There are currently no health and safety representatives at these locations, although the Acting Director responsible for mail processing², which has been identified as a higher-risk activity, became a member of the Health and Safety Policy Committee in August 2013.

Recommendation 1: We recommend that Program officials in HRD secure workplace health and safety committee members and workplace health and safety representatives, as applicable, by: verifying the current roster of active committee members and representatives; and, leveraging senior management support to attract the required personnel to fill gaps that currently exist.

2.2.2 File Management

File management for workplace health and safety committees is decentralized, resulting in differences in the retention of documentation and challenges in locating key OHS documents during turnover of committee members. Some of these documents, such as results of building inspections, committee meeting minutes, and HRSDC-Labour Program reports are mandatory elements of an occupational health and safety program. In the absence of a regular and consistent mechanism and process to retain these documents, it is difficult to readily monitor and confirm that workplace health and safety committee activities are being conducted as expected and observations and recommendations made by members of these committees are being properly addressed.

Recommendation 2: We recommend that Program officials in HRD centralize the collection and retention of key workplace health and safety committee documents to support Committee activities and regular reporting and analysis of OHS activities and events.

2.3 Roles, Responsibilities, and Accountabilities

While roles, responsibilities, and accountabilities for the OHS Program have been defined, there is a need to update these definitions to reflect the current Program and organizational structure.

The Occupational Health and Safety Program is supported by individuals within HRD as well as members of the Health and Safety Policy Committee, workplace health and safety committees, and health and safety representatives, once identified. PCO employees and managers not directly involved in the Program also have responsibilities, for example to engage Program officials when addressing incidents that occur in the workplace. It is important that all parties understand their roles, responsibilities and accountabilities for the successful execution of the Program.

² Mail processing is conducted in one of the buildings with fewer than 20 employees.

2.3.1 Definition and Understanding of Roles and Responsibilities

Responsibilities for occupational health and safety are reasonably understood by HRD personnel, considering the limited time that they have been with the Program and their lack of previous experience in this domain - the Labour Relations Advisor and his manager have been with the Program since September 2013. For these individuals, OHS forms only a portion of their portfolio of responsibilities and it has not been formally defined in their job descriptions. Under the current structure, the OHS Program does not have dedicated resources with the depth of knowledge and experience that it enjoyed in the past.

Interviews with health and safety committee members identified they have operated with limited guidance since before the Program was transferred to HRD and gaps exist in their understanding of the roles they are required to play with respect to OHS. Currently, only three of eight workplace health and safety committees have formal terms of reference and the Health and Safety Policy Committee has only recently been reactivated.

Additionally, our interviews identified that, in general, PCO staff do not understand who should be engaged on OHS-related matters. Activities, such as management of incidents, are occurring without direct OHS oversight, as employees not directly involved in the Program are not aware of the need to engage OHS officials. Committees and OHS Program officials are not consistently made aware of workplace accidents, incidents, complaints, refusal to work, inspections, and/or remediation, creating uncertainties in the nature and resolution of health and safety events in the department and resulting in different statistics being reported to the HRSDC - Labour Program.

2.3.2 Governance Structure

The OHS Program document has not been updated since April 2009 and thus does not reflect the transfer of responsibility from Security Operations to HRD. Other program documents have also not been updated for changes in roles and responsibilities under current resource levels, such as the completion of ergonomic assessments by third parties rather than a member of the OHS team. While the OHS Program document includes templates for terms of reference for workplace health and safety committees and the Health and Safety Policy Committee, these are not consistently used.

The HRD has future plans for the Program based on expectations associated with the level of effort required to support the Program and the support expected to be received by committees and health and safety representatives. There is a need to formalize and communicate related roles and responsibilities for effective OHS Program governance.

Recommendation 3: We recommend that Program documentation be updated to accurately describe the roles and responsibilities for key parties responsible for OHS, including health and safety committees and representatives, Program officials, and management in Corporate Services Branch and Security Operations Division. This would include ensuring that consistent terms of reference are approved for all workplace health and safety committees.

2.4 Tools and Training

Tools exist to help employees understand their duties with respect to occupational health and safety, although these need to be refreshed and training is required to update employees on OHS roles and responsibilities.

The 2009 OHS Program document outlines an overall training strategy for employees relative to their OHS responsibilities, including committee member training, task specific training for higher risk activities, and awareness training for management and employees. It also provides a professional development framework for OHS Coordinators, a role now fulfilled by officials in HRD responsible for the OHS Program, to maintain (or achieve) professional knowledge and establish PCO as a leader in the field. However, the training strategy is not being implemented and the OHS Program does not currently have the professional resources with the OHS knowledge described in the framework.

OHS training has been provided to employees in the past, but the Program has not coordinated training activities for some time – training information on the PCO OHS intranet site is more than two years out of date. Any OHS training that may be occurring is being done at the individual level, not as part of an OHS Program training strategy.

Individuals charged with OHS responsibilities, such as committee members, have not had training on Program requirements and expectations since committees were first established in or about 2009. In the absence of formal training, when OHS activities are being conducted, for example by workplace health and safety committees, members are conducting these activities to the best of their abilities or their own understanding of expectations. As a result, tools that were developed, for example building inspection templates, are not consistently being used. In cases where the workplace health and safety committees do perform inspections, members have not received feedback on the reports submitted and have noted repeat issues, leading them to question the value of their inspection reports which may have contributed to the decline in the number of inspections being performed.

For higher risk activities, documented procedures are available on the PCO intranet (e.g.: for motor vehicle operation), and procedures for the safe movement of heavy boxes are posted in appropriate locations. However, there has been no formal process to engage Program officials to inform related policies and procedures for high risk areas, such as dealing with hazardous substances including mould on files since the OHS Program was transferred to HRD. These issues are being defined outside of OHS directly by the operational areas where the individuals may not have an in-depth understanding of the OHS requirements and relevant authorities.

Recommendation 4: We recommend that Program officials in HRD update training programs and tailor training for individual roles and responsibilities within the OHS Program. Training taken should be logged and monitored.

2.5 Monitoring and Reporting

There is limited monitoring currently being conducted as the Program emerges from a period of relative inactivity.

After a period of inactivity, HRD Program officials are developing an action plan to reinvigorate the OHS Program. As part of this process they have compiled information on OHS activities and have noted that committees are not functioning as required in each workplace, impacting PCO's ability to effectively report on OHS at the Program level. The Labour Relations Advisor currently collects information on OHS incidents, but does not capture information relating to key OHS activities such as items noted during building inspections, when they are conducted, and other priorities such as the recruitment, membership, or activities of committees.

As part of defining their action plan, the HRD has identified that their first priorities with respect to reinvigorating the OHS Program include reinvigorating the health and safety committees and updating the OHS Policy. The reactivation of committees provides the opportunity to establish mechanisms to regularly monitor and record consistency of key priorities and OHS requirements, such as workplace health and safety committee meetings, results of building inspections, incidents and remediation for review by the Health and Safety Policy Committee as well as by senior management.

Results of our interviews indicate that verbal updates are being provided on the status of the OHS Program and action plan through the Health and Safety Policy Committee and directly to the Manager Labour Relations and Classifications and to the Director – HRD-Operations. Program officials plan to look into defining formal mechanisms to monitor the Program once priority areas are addressed.

Recommendation 5: We recommend that the Program officials in HRD develop mechanisms to collect and report on key activities, results, and trends to the Health and Safety Policy Committee as well as to senior management. This reporting should include adherence to relevant legislation and results of the OHS Program. A mechanism should be developed to capture and analyze information obtained during regular OHS activities, such as workplace health and safety committee meetings and building inspections, and to prioritize key action items.

2.6 Tracking of Incidents

While procedures exist to report OHS incidents, they are not being followed in practice, and mechanisms used to track OHS incidents could be improved.

A procedure exists on the PCO OHS intranet site for incident reporting, which includes the involvement of a member of the workplace health and safety committee or health and safety representative and OHS Program officials. In practice, however, individuals may be dealing with the issue independently without engaging Program officials. During interviews, workplace health and safety committee members indicated that they were not aware of any incidents occurring during the year, while the Labour Relations Advisor had documented eight incidents between September and the beginning of October 2013.

OHS officials in HRD are being made aware of incidents by Security Operations Division or directly by employees who are dealing with the issue; members of the local workplace health and safety committee have not been involved. Once informed of an issue, OHS officials coordinate with the responsible party, such as Accommodations Division, to resolve the problem. Basic information on incidents is tracked in a spreadsheet, although there are no controls over the completeness of this information nor is there a method to rank or prioritize items, to indicate the type of activity, or to record what items have been reported to the workplace health and safety committee.

Recommendation 6: We recommend that communication between Program officials in HRD and workplace health and safety committees and health and safety representatives be strengthened. There should be open communication between all parties on incidents being addressed in their respective areas and the status of actions taken in response to identified issues.

3.0 Management Response and Action Plan

Audit of Occupational Health and Safety
 The Assistant Deputy Minister, Corporate Services Branch has overall accountability for the Action Plan.

Recommendation	Response and Planned Actions	Responsibility	Due Date
<p>We recommend that the Assistant Deputy Minister, Corporate Services Branch, as the primary senior manager responsible for the OHS Program take overall responsibility for implementation of the following by OHS Program officials in HRD:</p> <p>1. <i>Secure workplace health and safety committee members and workplace health and safety representatives, as applicable, by: verifying the current roster of active committee members and representatives; and, leveraging senior management support to attract the required personnel to fill gaps that currently exist.</i></p>	<p>The Assistant Deputy Minister, Corporate Services accepts the overall responsibility for implementation of the following recommendations.</p> <p>The Human Resources Division (HRD) has created an up-to-date roster of all Workplace Health and Safety Committee membership and will ensure that it remains current. Membership gaps have been identified and will be addressed. HRD will work closely with the members of the PCO Executive Team and bargaining agents to ensure the continuity of sound governance.</p>	<p>ADM, CSB</p> <p>HRD OHS Representative, Director of Human Resources Operations</p>	<p>March 31, 2014</p>
<p>2. <i>Centralize the collection and retention of key workplace health and safety committee documents to support Committee activities and regular reporting and analysis of OHS activities and events.</i></p>	<p>HRD will ensure that documentation necessary to support the implementation and governance of the OHS program will be maintained in accordance with the CLC part II requirements and PCO Records Keeping Policy.</p>	<p>WHSC and HRD OHS Representatives</p>	<p>March 31st, 2014 and on-going</p>
<p>3. <i>Update Program documentation to accurately describe the roles and responsibilities for key parties responsible for OHS, including health and safety committees and representatives, Program officials, and management in Corporate</i></p>	<p>HRD will revise the OHS Policy and other H&S documentation to accurately describe the roles and responsibilities of the different OHS stakeholders. This will include revising the InfoNet site contact information.</p>	<p>HRD OHS Representatives</p>	<p>December 10th, 2013 COMPLETED</p>

Recommendation	Response and Planned Actions	Responsibility	Due Date
<p><i>Services Branch and Security Operations Division. This would include ensuring that consistent terms of reference are approved for all workplace health and safety committees.</i></p>	<p>HRD will meet with each WHSC in December 2013 and January 2014 to present template Terms of Reference and lead discussions on what sections might be modified to reflect each particular workplace</p> <p>Each WHSC will finalize and endorse their Terms of Reference at their January 2014 meeting.</p>	<p>HRD OHS Representatives</p> <p>WHSC Representatives</p>	<p>March 31, 2014</p> <p>March 31, 2014</p>
<p><i>4. Update training programs and tailor training for individual roles and responsibilities within the OHS Program. Training taken should be logged and monitored.</i></p>	<p>HRD has inventoried the existing training programs that are available.</p> <p>HRD will develop a training plan with regards to Committee members roles and responsibilities.</p> <p>Online training delivered by the Canada School of the Public Service will be scheduled for each WHSC and HSPC members to ensure their understanding of roles and responsibilities. HRD will track the training that is completed and follow-up to ensure that new members are scheduled to attend the required training.</p>	<p>HRD OHS Representatives</p> <p>HRD OHS Representatives</p>	<p>November 30th, 2013 COMPLETED</p> <p>September, 2014</p>
<p><i>5. Develop mechanisms to collect and report on key activities, results, and trends to the Health and Safety Policy Committee as well as to senior management. This reporting should include adherence to relevant</i></p>	<p>A process to track and monitor training is being developed by HRD.</p> <p>HRD will develop a report card for each WHS Committee to report to the Health and Safety Policy Committee and senior management on the committee's key activities.</p>	<p>HRD OHS Representatives</p> <p>HRD OHS Representatives</p>	<p>March 31, 2014 and ongoing</p> <p>March 31, 2014 and on-going</p>

Recommendation	Response and Planned Actions	Responsibility	Due Date
<p><i>legislation and results of the OHS Program. A mechanism should be developed to capture and analyze information obtained during regular OHS activities, such as workplace health and safety committee meetings and building inspections, and to prioritize key action items.</i></p>	<p>HRD will compile the issues raised at each Workplace Health and Safety Committees (WHSC) and bring those which have an impact on the organization as a whole for discussion at the Policy Health and Safety Committee.</p>	<p>HRD OHS Representatives</p>	<p>March 31, 2014 and on-going</p>
<p><i>6. Strengthen communication between Program officials in HRD and workplace health and safety committees and health and safety representatives. There should be open communication between all parties on incidents being addressed in their respective areas and the status of actions taken in response to identified issues.</i></p>	<p>WHSC meetings will be scheduled in advance. The meetings will occur 9 times per calendar year. These regularly scheduled meetings, attended by the OHS representatives, will ensure appropriate flow of information to all stakeholders.</p>	<p>WHSC and HRD OHS Representatives</p>	<p>Starting in January 2014 and on-going afterwards</p>
	<p>WHSC members will be trained in the completion and submission of the required Forms, i.e. LAB 1070. List of activities to be performed by WHSC with target dates, such as building inspections and recruitment will be communicated and monitored by HRD OHS Representatives.</p>	<p>HRD OHS Representatives</p>	<p>By April 30, 2014 and on-going</p>

Annex 'A' - Audit Criteria

Criteria for the Audit of Occupational Health and Safety	Associated Generic Criteria and Sub-Criteria from TBS – Audit Criteria Related to the Management Accountability Framework (MAF)
Objective 1: Alignment with federal legislation and government-wide requirements.	
1.1 Policies are aligned with relevant federal and central agency requirements.	<p><i>MAF element – Policy and Programs (PP)</i> PP-4 Guidelines and procedures that are aligned with government-wide policies and expectations have been defined and implemented.</p> <p><i>MAF element – Stewardship (ST)</i> ST-9 Assets are protected.</p> <p><i>MAF element – People (PPL)</i> PPL-7 Suitable policies and procedures to support the development and management of human resources are established, maintained and communicated.</p>
1.2 Mechanisms exist to stay current on relevant federal and central agency requirements.	<p><i>MAF element – Governance and Strategic Direction (G)</i> G-5 External and internal environments are monitored to obtain information that may signal a need to re-evaluate the organization’s objectives, policies and/or control environment.</p>
1.3 Processes and procedures enable adherence with relevant legislation and government policies.	<p><i>MAF element – Policy and Programs (PP)</i> PP-4 Guidelines and procedures that are aligned with government-wide policies and expectations have been defined and implemented.</p>
1.4 Mechanisms exist to monitor consistency with relevant legislation and Departmental policies.	<p><i>MAF element – Policy and Programs (PP)</i> PP-3 Monitoring of policy and program design options occurs in a regular and timely manner.</p> <p><i>MAF element – Stewardship (ST)</i> ST-7 Compliance with financial management laws, policies and authorities is monitored regularly.</p> <p><i>MAF element – Public Service Values (PSV)</i> PSV-1 Management, through its actions, demonstrates that the organization’s integrity and ethical values cannot be compromised. PSV-3 Formal channels of communication exist for people to report suspected improprieties.</p>
Objective 2: Effectiveness of the framework of controls over PCO’s Occupational Health and Safety Program in contributing to a safe and healthy working environment for PCO personnel.	
2.1 Roles, responsibilities, and accountabilities for occupational health and safety are clearly defined, communicated, and understood.	<p><i>MAF element – Accountability (AC)</i> AC-1 Authority, responsibility and accountability are clear and communicated.</p>

<p>2.2 Employees are provided with the tools and training they require to perform their duties effectively with respect to occupational health and safety.</p>	<p><i>MAF element – People (PPL)</i> PPL-4 The organization provides employees with the necessary training, tools, resources and information to support the discharge of their responsibilities. PPL-7 Suitable policies and procedures to support the development and management of human resources are established, maintained and communicated.</p>
<p>2.3 Mechanisms are in place to track occupational health and safety incidents, communicate and report to the proper delegated authorities on a regular and timely basis, and take corrective action as necessary.</p>	<p><i>MAF element – Stewardship (ST)</i> ST-18 Financial and non-financial reporting is reviewed and approved. ST-20 Appropriate and timely financial and non-financial reporting is communicated internally and externally. <i>MAF element – Results and Performance (RP)</i> RP-2 Management has identified appropriate performance measures linked to planned results. RP-3 Management monitors actual performance against planned results and adjusts course as needed.</p>
<p>2.4 An effective governance structure is in place where roles, responsibilities, and accountabilities are clearly communicated and understood to enable strategic oversight of the Department’s Occupational Health and Safety Program.</p>	<p><i>MAF element – Governance and Strategic Direction (G)</i> G-1 Effective oversight bodies are established. G-2 The oversight body (or bodies) has a clearly communicated mandate that includes roles with respect to governance, risk management and control.</p>
<p>2.5 Information related to occupational health and safety is provided to those charged with oversight including HRD employees and committee members, and partners on a timely basis to enable effective decision making.</p>	<p><i>MAF element – Governance and Strategic Direction (G)</i> G-6 The oversight body / bodies request and receive sufficient, complete, timely and accurate information. <i>MAF element – Risk Management (RM)</i> RM-6 Management appropriately communicates its risks and risk management strategies to key stakeholders. <i>MAF element – Stewardship (ST)</i> ST-18 Financial and non-financial reporting is reviewed and approved. ST-20 Appropriate and timely financial and non-financial reporting is communicated internally and externally. <i>MAF element – Results and Performance (RP)</i> RP-2 Management has identified appropriate performance measures linked to planned results. RP-3 Management monitors actual performance against planned results and adjusts course as needed.</p>

The TBS MAF criteria make several references to “financial” management. Under the notion of generally accepted management practices, the principles of monitoring consistency with laws, policies, and authorities apply equally to occupational health and safety.