



Audit at a Glance

Audit of occupational health and safety at ECCC

Environment and Climate Change Canada's (ECCC) diversity of activities results in a wide variety of occupational health and safety issues to consider. These include the fieldwork being done in the air, on water, on contaminated soil, under difficult meteorological or emergency conditions. The field and laboratory work also includes complex procedures and the handling of potentially dangerous substances. ECCC therefore requires an occupational health and safety (OHS) program capable of addressing many exposures and requirements.

Legislation is in place to safeguard the health and safety of Public Service employees. Charges can be laid under the [Canada Labour Code, Part II](#) (CLC) or the [Criminal Code of Canada](#). This issue is an important component of the Department's commitment to a high standard of values and ethics. ECCC is responsible for the health and safety of all employees, contractors and visitors on its sites. Foremost, non-compliance with OHS legal standards and requirements increases the health and safety risks for ECCC staff, contractors and visitors. It could also adversely affect ECCC's reputation as an employer and ultimately affect its ability to fulfill its mandate.

What the audit examined

The objective of the audit was to assess the effectiveness of departmental governance, risk assessment and management controls in ensuring that measures for the occupational health and safety of employees are in place, in compliance with relevant laws, regulations and government policies.

The audit examined OHS initiatives and activities at the site level between January 1, 2017 and December 31, 2018. It focused particularly on high-risk duties in the field and laboratories, generally undertaken by employees in the Enforcement Branch (EB), Canadian Wildlife Service (CWS), Meteorological Service of Canada (MSC) and Science and Technology Branch (STB).

What the audit found

Overall, ECCC is meeting its responsibilities under the CLC. Key elements of the management control framework for OHS are in place and functioning effectively. In questionnaires completed by 101 employees, 94% indicated that they agree or strongly agree that they feel safe in the conduct of their duties, they have the training needed to perform their duties safely and they have the tools and equipment required to fulfill their duties in a healthy and safe manner.

Specifically, the audit found the following.

Governance

- An OHS governance structure, aligned to legislative requirements, has been developed, implemented and communicated, and is understood by supervisors and employees.
- Roles and responsibilities for the day-to-day management of OHS are clearly documented, defined, communicated and understood.
- Improved clarity, guidance and communication are required for work sites with fewer than 20 employees.

Training

- The OHS management team has developed and delivers mandatory OHS training. However, despite the efforts of the OHS management team, as of December 2018, 25% of executives, 46% of managers and supervisors and 32% of all employees have not completed the mandatory training.
- Overall, employees indicated that they have received the job-specific training needed to complete their tasks in a healthy and safe manner; however, there is a lack of direction on how branches should track and monitor OHS training.

Workplace inspections and investigations

- OHS investigations and inspections are taking place as required under the CLC; however, further clarity on the tracking, monitoring and follow-up of recommendations is required.
- The data in the OHS data management system is well maintained and accurate; however, the level of analysis could be enhanced to identify and report on geographic and branch OHS trends.

Recommendations and management responses

Six recommendations were issued to address the areas of concern. Management agrees with the recommendations and has provided an appropriate response and an action plan.

Recommendation 1 – Sites with fewer than 20 ECCC employees

The Chief Human Resources Management Officer should provide clear direction and guidance to OHS sites with fewer than 20 ECCC employees.

Management response

The OHS Division currently conducts compliance monitoring and works directly with OHS reps in these locations in an effort to strengthen compliance. We currently report to Regional OHS Committees on site compliance four times per year.

We will take steps to improve communication, direction, and guidance to senior building officers, regional OHS committees, site representatives and managers responsible for sites with fewer than 20 ECCC employees.

Recommendation 2 – Mandatory training

The Chief Human Resources Management Officer should remind executives who have not completed the mandatory training of the requirements and on a periodic basis, provide the Executive Management Committee with a list of the executives who have not completed the required training.

Management response

We will take actions to improve reporting on training requirements for executives to the Executive Management Committee. We commit to providing regular reports and targeted communications to the Deputy Ministers and the associate deputy ministers to bring mandatory training into compliance.

Recommendation 3 – Accountability regarding mandatory training

The Chief Human Resources Management Officer should review options to document the accountability of executives, supervisors and managers to complete the mandatory training and to ensure that all employees have completed the required training.

Management response

We are currently conducting targeted communications to supervisors and managers who have not yet completed their mandatory training. While this ensures that a supervisor or manager is aware of upcoming training within their area, the importance of taking the training must come from within their respective branch management teams.

This is a shared responsibility and while the OHS Division commits to sharing reports with the Executive Management Committee members, it is imperative that committee members share these reports within their respective management cadre, providing the necessary direction on the importance of ensuring that training compliance is achieved.

In addition, the OHS Division will run quarterly communication campaigns directed at ECCC employees, encouraging awareness and compliance.

Recommendation 4 – Tracking and monitoring job-specific training

The Chief Human Resources Management Officer should address the inconsistencies across branches in tracking and monitoring job-specific training.

Management response

The responsibility to track and monitor mandatory and job-specific training within branches is a management responsibility. Branches are using different tools to do the required follow-ups with their employees. As the audit points out, these practices are inconsistent. The Human Resources Branch will commit to working with branch heads to leverage best practices and existing tracking and reporting solutions.

Recommendation 5 – Workplace investigations and inspections

The Chief Human Resources Management Officer should:

- a. Revise the OHS Governance Framework to articulate clearly accountability for following up on recommendations from workplace inspections and investigations. This could include escalating mechanisms, to empower local committees**
- b. Provide clear direction for the consistent monitoring, implementation and follow-up on investigation and inspection recommendations**

Management response

- a. The clarification of roles and responsibilities was something identified at the 2018 OHS Symposium and one of the priorities that we identified to work on in 2019-2020.

The OHS Division will take actions to ensure that we include clearly articulated accountability for following up on recommendations from workplace inspections and investigations following a workplace accident. This will include incorporating strategies that articulate the breakdown of responsibility between senior building officers and the responsible managers of employees. This requirement has been expressed as being particularly problematic for employees who work in another location than their supervisor or manager.

It will also include escalation procedures to ensure that committees feel empowered and effective.

- b. As a best practice noted in the audit report, the OHS Division will introduce a procedure asking each OHS committee to form a sub-committee to ensure that there is dedicated follow-up and tracking of action items as a result of an investigation or workplace inspection. This sub-committee will raise concerns with the committee for discussion, or with the co-chairs for resolution. This procedure will include a simplified process for OHS reps at sites with fewer than 20 employees. The process will also include the sharing of this follow-up as part of our compliance monitoring.

For this recommendation to be successful, we will need to implement the clarification of roles and responsibilities outlined in Recommendation 5a.

Recommendation 6 – Leveraging OHS data

The Chief Human Resources Management Officer should strengthen how ECCC leverages OHS data to identify and report on trends and areas of high risk.

Management response

The Human Resources Branch will now dedicate in the OHS Division an oversight advisor whose main focus will be to leverage the OHS data, and identify trends and high-risk areas. The Oversight Advisor will also lead many of the reporting initiatives as a result of this audit. The items identified in the audit report will be the priority items with respect to reporting.