



MANAGEMENT SYSTEMS

Occupational
Health and Safety:

The Road Ahead

Executive Summary

Occupational Health and Safety Management Systems are an emerging trend in business and in the health and safety field. They reflect the principles of quality, due diligence and continual improvement and provide for the creation of prevention programs that can be implemented, maintained, documented and verified. Based on risk assessment and organizational capabilities, Occupational Health and Safety Management Systems focus more on need and less on prescriptive requirements.

Qualities of an OHS Management System

- ▶ Performance based
- ▶ Based on workplace hazards and risks
- ▶ Conformance to Occupational Health and Safety Policy
- ▶ Establishment, monitoring and achievement of health and safety goals and objectives
- ▶ Incorporates continual improvement process
- ▶ Integration into business processes
- ▶ Leadership commitment and stakeholder involvement
- ▶ Aligns and builds on quality and environmental activities
- ▶ Potential for registration to satisfy customer requirements
- ▶ Regular system audit and management review
- ▶ Manage legislative compliance
- ▶ Establish due diligence

“A successfully implemented Occupational Health and Safety Management system affords a logical, comprehensive framework to justify, create and continually improve health and safety program activity.”

Today, many organizations are looking beyond compliance and consequence to a new world of health and safety performance. Workplace culture, values and beliefs support the creation of

management systems designed to address hazards, risks and organizational capabilities to sustain and continually improve health and safety results. In this discussion, the evolution of management systems will be explored in the context of the current Ontario business and legislative climate. Trends within the broader field of occupational health and safety will also form a part of this exploration.

Ontario Health, Safety and Injury Insurance Programs: Evolving Beyond Due Diligence

Traditionally, an organization's understanding of workplace health and safety evolves as events occur over time. Many new employers begin with little or no understanding of workplace hazards, risks or requirements until a worker is injured or becomes ill. As they grow, they enhance their knowledge by reacting to the attention brought to bear by compensation or

Evolution of OHS Programs in Organizations

1. Unknowing
2. Reactive
3. Due Diligence
4. Management System

compliance officials. Reaction turns to experience and the organization incorporates health and safety activities into its operations to address the problems of the past. At some point, the organization realizes that significant risks to its

operations may result from a contravention of legislation and institutes a program of activity designed to satisfy due diligence requirements.

In the 1990's, many employers strived to attain due diligence. Building on a solid understanding of workplace hazards and legislative requirements, duly diligent employers were protected from prosecution by the establishment and maintenance of policies and procedures, employee communication and education, program monitoring and enforcement. With the addition of a regular program audit and plenty of documentation, employers could demonstrate reasonable precautions should an unfortunate tragedy occur. An interesting outcome of due diligence was the institution of a proactive system to anticipate, recognize, assess and control workplace hazards. As the 90's progressed and prosecution became a more ready tool of the Ontario government, due diligence became an important part of an organization's health and safety strategy.

The last major change to the *Ontario Occupational Health and Safety Act* occurred in 1991. *Bill 208: An Act to Amend the Occupational Health and Safety Act* provided for increased worker participation and employer accountability. It set out a requirement for an Occupational Health and Safety policy and implementation program. Workers were also given enhanced opportunities for information and consultation. In addition to an overall increase in fines and penalties on conviction, corporate officers and directors were also charged with taking reasonable care to ensure the organization complied with the law and any requirements from provincial enforcement officials. Recent changes to the Regulations also establish the opportunity to develop Codes of Practice. The requirements for Pre-Start Health and Safety Reviews in the Industrial Regulations speak to the need to manage change. These features are reflected to some degree in a variety of Occupational Health and Safety Management Systems.

Concurrently, the Worker's Compensation Board of Ontario went through a number of changes resulting in a new Workplace Safety and Insurance Board (WSIB). Supported by changes to the *Workplace Safety and Insurance Act*, the WSIB added prevention activities to its injury insurance mandate. The prevention mandate fostered the creation of a Best Practices Division and enhanced the role of the Workwell Evaluation for organizations placing a human and financial burden on the compensation system. The Workwell Evaluation has evolved to include risk-based decision making to determine thresholds for the establishment of standards and procedures and delivery of training. The Evaluation also includes a significant review of leadership support related to the overall OHS policy and business planning process. These themes of continual improvement, risk assessment, standard setting, leadership support and business planning are seen in many of the new Occupational Health and Safety Management Systems.

Within the last few years, the WSIB's Safety Group Program has brought like-minded employers together to improve their health and safety programs. This incentive program allows employers to pool their WSIB assessment leading to a potential rebate resulting from yearly program activities. Leadership, organization, hazard recognition and assessment and control



activities are implemented using “The Five Steps to Managing Health and Safety”.

These steps include:

- 1) Set standards
- 2) Communicate
- 3) Train
- 4) Evaluate
- 5) Acknowledge success and make improvements

This “management system” approach provides a cycle for implementation and business improvement.

Finally, with the advent of recent amendments to the Criminal Code of Canada, organizations and senior officers may be held liable for the negligent actions of their representatives. In addition to enhancements of organizational and personal penalties, the justice system has been given new creative powers for sentencing, including the institution of standards, policies, procedures and practices. A managed system approach incorporates these elements into health and safety programs, allowing for injury and illness prevention and the creation of due diligence.

Business Adopts the Quality Improvement Process

“Say what you do, do what you say and prove it”, became the mantra for business improvement into the new millennium. Responding to global competition and customer requirements, Ontario organizations jumped onto the quality bandwagon with enthusiasm in the last decade of the twentieth century. International quality standards, like ISO 9000 and its derivatives, allowed business to demonstrate consistency of product or service delivery to clients and customers. In many cases, organizations were forced to adopt the quality processes in order to remain in business.

Building on the quality process of Plan – Do – Check – Act, organizations established systems and processes to manage and control quality. The quality improvement cycle was incorporated into ISO 14001, an international standard for environmental management systems.

Integration of quality and environmental issues into an organization's structure and business practices is a significant theme of the ISO process. Quality and environmental management were not add-ons to a business. They became an integral part of the way that organizations conducted their business.

In order to demonstrate conformance to these standards, registration bodies created processes to ensure consistency of application of the standards. Once an organization outlined its policy, standards and procedures, it would have to prove through outside verification that it conformed, in documentation and in practice, to its internal requirements. The registration or certification audit became the tool of organizations to demonstrate conformance to the ISO standard.

Employers in many sectors realized that quality and environmental management were quickly becoming a business reality and moved to implement management systems leading to conformance and registration.

An emerging concern, expressed by employers, is the cost-benefit of quality and environmental management system implementation and registration. The amount of documentation required to demonstrate conformance to quality and environmental management system standards is significant. Organizations embracing the principle of due diligence understand the value of documentation and are not likely to be discouraged by the documentation requirements of an Occupational Health and Safety Management System.

A Case for a Management System Approach to Health and Safety

Management is about the application of organizational culture and resources to accomplish mission. It is supported by organizational values, beliefs, goals and objectives and flourishes where clear roles, responsibilities, authorities and accountabilities are set out. A management system links business processes to manage and continually improve an aspect of an organization's operations. It becomes the framework in which program activity is planned, implemented, evaluated, improved, documented and verified. In the context of Occupational Health and Safety, a clearly defined, internationally recognized management system standard does not exist at this time. A number of management

system models and specifications exist to assist organizations in reaching a level of health and safety performance beyond that supported by their past due diligence and quality practices.

The International Labour Organization (ILO) published "Guidelines on Occupational Health and Safety Management Systems" in 2001. The ILO-OSH 2001 document outlines a national framework for the inclusion of occupational health and safety management system principles into legislation. It also provides a framework for the integration of health and safety into corporate culture and management systems. Organizationally, ILO-OSH 2001 specifies a management

system built on a continual improvement cycle including these elements: Policy, Organizing, Planning and Implementing, Evaluation and Action for Improvement.

This management system cycle is supported by a system audit requirement.



Source: ILO-OSH 2001



The British Standards Institution's (BSI) Occupational Health and Safety Assessment Series (OHSAS) 18001 is quickly becoming an internationally recognized specification for an Occupational Health and Safety Management System. Developed to be compatible with ISO 9000 and 14001, OHSAS 18001 has been accepted in many jurisdictions as a national technical specification for an Occupational Health and Safety Management System.

Following the 14001 format, OHSAS 18001 sets out performance requirements for Occupational Health and Safety Management Systems

including requirements for: OHS Policy, Planning for Hazard Identification, Risk Assessment and Control, Implementation and Operation, Checking and Corrective Action and Management Review. System audits are based on the organization's ability to conform to its OHS policy and OHSAS 18001 management system requirements. OHSAS 18001 is currently not an ISO standard, but is expected, by many, to form the basis of an international standard in the future.

In North America, a number of Occupational Health and Safety Management System voluntary standards are currently under development. In the United States, a management system for health and safety, ANSI Z.10, has been drafted. Similarly, the Canadian Standards Association will be forming a technical committee in 2004 to develop an Occupational Health and Safety Management System standard, based to some degree on OHSAS 18001.

Elsewhere in Canada, federal and provincial jurisdictions are considering requirements for prevention programs as part of their workplace health and safety legislation.

Features and Benefits of a Managed System Approach to Health and Safety

- ▶ Performance based system to manage hazards and risks in relation to organizational capabilities and needs
- ▶ Assists organizations in conforming to Occupational Health and Safety Policy
- ▶ Provides for the establishment, monitoring and achievement of health and safety goals and objectives
- ▶ Incorporates continual improvement cycle, i.e., Plan – Do – Check – Act into health and safety programming
- ▶ Integrates health and safety into organizational operations and processes
- ▶ Seeks support/commitment from Organizational Leadership and involvement of stakeholders
- ▶ Aligns with Quality and Environmental Management principles and systems
- ▶ Provides opportunities for Registration or Certification to support anticipated future client/customer requirements
- ▶ Allows for regular system effectiveness audit and management review and oversight
- ▶ Establishes a system to manage legislative compliance and due diligence
- ▶ Builds on previous due diligence and quality/environmental management system experience

Conclusions

Occupational Health and Safety Management Systems are an emerging trend in business and in the health and safety field. They reflect the principles of quality, due diligence and continual improvement and provide for the creation of prevention programs that can be implemented, maintained, documented and verified. Based on risk assessment and organizational capabilities, Occupational Health and Safety

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