



Announcer:

It's time for the *IHSA Safety Podcast*.

Ken Rayner:

Welcome to the *IHSA Safety Podcast*. I'm your host, Ken Rayner. On today's episode, we're discussing the importance of documentation in an occupational health and safety management system. Documentation is critical because it provides structure, supports compliance through consistent application, enhances communication, and facilitates continual improvement, ultimately contributing to a safer, healthier, and more effective workplace.

So why does creating policies, procedures, practices, and processes...why are they seen by some to be such a difficult and arduous task? To help us answer this question, we're joined by IHSA's Adam Carruthers, a self-proclaimed documentation enthusiast. Welcome to the podcast, Adam. Great to have you here.

Adam Carruthers:

Good morning, Ken. I'm excited to be here. It's funny that you say a "documentation enthusiast." I was actually teaching a supervisor course recently, and I always ask, "How many people get excited about writing policies and procedures?" And I am, quite literally, usually the only one putting my hand up because I've been writing policies and procedures for probably half of the last 20 years that I've been doing health and safety. So I'm always super excited to talk about policies, procedures, documentation, and occupational health and safety management systems. It is something I've enjoyed over the 20-year career that I've had in health and safety.

Ken Rayner:

Okay, amazing. And I'm hoping that this is going to give me some inspiration, because, a little while ago, I got assigned by human resources to revise one of our policies, and I have continually put it on the back burner. It's one of those things that gets transferred over from one work list to the next because it's typically something that I'm putting off. And I know it has to get done, and I know it's important, and I know at the end of this podcast I'm going to feel like I really need to move forward with this and get it done because of the importance of it. So I'm hoping to be inspired by your words today, Adam.

So we'll see how that goes. But hey, let's start it off. And I wanted to ask you a couple questions and then maybe do a little bit of role play, because I'd love to have some interactions pretending that I'm a small business owner, and I need some guidance from a subject matter expert like yourself to be able to document my procedures and my policies and create that so I can grow my company in a way that I know

is going to keep everybody safe. So does that sound okay for today's podcast together?

Adam Carruthers:

That sounds exciting, and I'm looking forward to trying to get you excited about writing policies and procedures. Because, like you said, lots of people look at it and say, "It's complicated. It's hard. I don't know what to do." And just before we begin, I always remind people that you have to start somewhere with writing a policy procedure. I will be honest with you, when I started writing policy procedures, they were not great, because I didn't know what I was doing. It took me years to learn how to do it properly, and I'm excited to share some of the things I've learned; some of the resources we have—things to make it easier for people to write a policy or procedure to help keep their people safe in the workplace.

Ken Rayner:

All right. So let's get into it. Okay. Now you're getting me excited. I didn't think I was going to get excited about policies and procedures, but I'm getting pumped up. Sounds good. Okay. So Adam, in preparation for this podcast, I did a little digging in Ontario's *Occupational Health and Safety Act* (OHSA). And just to be clear, we're going to talk mostly about the Act today.

We also know that some of our membership falls under the *Canada Labour Code, Part II*. But I think Adam, for the most part, writing a policy is very much similar whether you're doing it within a transportation industry, whether you're doing it through construction, electrical utilities. For the most part, they're very similar. Maybe there's some nuances based on the legislation, but is that accurate? In terms of writing a policy, should it be somewhat similar irrespective of the industry you're in?

Adam Carruthers:

Absolutely. Writing a policy, a procedure, a program—when you look at developing any of this stuff, your occupational health and safety management system, the process is generally the same way. Once you develop it, you have a process in place. It's really looking at the nuances, whether you're working in construction, industrial, mining, or federally regulated workplaces. You're just looking at specific laws and regulations that may apply specifically to you that may not apply to somebody else. But overall, the process is going to be relatively the same once you develop how you're going to do it for your specific workplace.

Ken Rayner:

Okay, perfect. So let's keep it simple and clear. We'll just reference, for the most part, the *Occupational Health and Safety Act* for the purposes of this podcast and what we're going to talk about. So that being said, again, Adam, in preparation for this, I looked at Ontario's *Occupational Health and Safety Act*, particularly Section 25. And that states, "Prepare and review at least annually a written occupational health and safety policy and develop and maintain a program to implement that policy." So Adam, why in your opinion, was legislation introduced many years ago that requires an employer—specifically one with more than five employees—to not only prepare and review at least annually a written occupational health and safety policy statement but also develop and maintain a program to implement that policy?

Adam Carruthers:

To put it bluntly, people keep getting hurt, seriously injured, critically injured, and killed on the job. When we look at the data provided by the [Ministry of Labour, Immigration, Training, and Skills Development] and the WSIB [Workplace Safety and Insurance Board], it's typically not companies with hundreds or thousands of workers that are experiencing the majority of injuries. It tends to be smaller companies. And when we look at the "why," it tends to be a lack of competency when it comes to health and safety. Now, when I say a lack of competency, I do not mean it in a negative way. Competency requires that knowledge, that training, and experience. Smaller companies, newer companies, while they may be excellent at what they do, they may be lacking that knowledge, training, and/or experience when it comes to health and safety in the workplace.

They may have never developed a policy or procedure, and they're relying on the fact that they feel that they know how to do something. In order to bridge that gap of competency around health and safety, legislation was designed to push the employer to have that something in place to help keep the workers safe in the workplace. And that's what I find is the reason they've developed a lot of these laws and these regulations around health and safety in Ontario.

Ken Rayner:

Is it possible, in your opinion, Adam, to be able to have a workplace with more than one worker—say like five, or six, seven, eight workers—and be consistent in your application without documentation? I can't imagine that there's another way of doing it in terms of ensuring consistency across all the activities that you perform.

Adam Carruthers:

It's hard if you don't have some way of documenting what you're doing. There's an old adage of them saying that "If you don't document something, how do you prove that you were doing it if something were to happen?" So when you have that documented health and safety program—that policy, those procedures, those inspections, the safety talks, the investigation forms—it sounds like a lot. And especially when we teach our supervisors in our *Basics of Supervising* course, we go through a whole thing talking about due diligence, and it goes back to documentation. As you get more complex in your organization—more people, more tasks, more work that you're doing—of course you're going to add more paperwork, you're going to add more processes, more procedures as you go and you work your way through. But I always encourage people when they start out, when they're building their programs and what they're doing: look at the endgame. Where does your company want to go? What do you want to do? Who do you want to work for? And that is going to help direct you in advance to develop your policies and procedures. So whether you're one person, one person in the company, you run it, or you own it, if you're the person that does it, have you done inspections on your vehicles? Do you do a quick walkthrough of your workplace?

They give you minimum standards in the acts and the regulations, talking about "If you have five people, having your health and safety for first aid, and the different training requirements, and the supervisor requirements." But when we look at the legislation regulations, those are minimum standards. So it's a good idea to say, "Hey, what do I want to do five years from now? I want to have five people, 10 people. I want to go from making \$100,000 dollars a year to \$10 million a year, 10 years or 20 years down the

road." If you start by building your program where you want to have it later on, it makes it so much easier to build onto that program and to add in a new policy or a new procedure by looking at what you're doing and growing with it.

That's not saying you're not going to change how you develop a policy, a procedure, how you look up documentation, but it's going to help set you up for success, where you're not going back five years or 10 years from now and having to redo everything from scratch because all of a sudden you have new stuff you have to look for.

So regardless of what you have, developing how you do it when you're building it is going to make life so much easier for you later on as your company becomes more successful and bigger, having to do more requirements with different regulatory bodies, different government agencies...it's going to make your life easier.

Ken Rayner:

Right on. I love that guidance. Adam, this is a great segue into my next question: could we pretend that I'm a small business owner, and I've experienced good success and growth in the two years since I started my business, and I've now grown to now employ six workers? Under Ontario law, if I'm operating under the *Occupational Health and Safety Act*, I now require a written health and safety policy, and I need a program to support it. Where do you suggest I begin?

Adam Carruthers:

In all honesty, when you're writing your programs, policies, and procedures, look at the certification standards, when it comes to your systems. Again, I'm a believer in looking ahead. Look ahead to where you want that organization to grow. More and more municipalities, constructors, clients, organizations, they're requiring some form of certified occupational health and safety management system. And setting it up as you develop it not only prepares you for those jobs you may eventually bid on but it also lays that foundation for good, safe work behaviors and attitudes now—which is arguably easier to positively develop than it will be once you have hundreds if not thousands of workers. So COR®, the Certificate of Recognition standard, is a great spot to start as one recognized standard that will help set you up for success with a good occupational health and safety management system.

Ken Rayner:

And what should my occupational health and safety policy state, and how can I create a policy that can be easily understood by all my employees?

Adam Carruthers:

First thing: your health and safety policy is your senior management commitment to health and safety in the workplace. That's first and foremost. Your senior managers, your owners, the people that run your company—depending whether they're big or small—that's their commitment to keep you as the worker safe in the workplace. And I always tell people "keep it simple." Health and safety policy does not need to be complicated. Too often I'm seeing policies and procedures that are trying to sound smarter than

they need to be, but at the end of the day, workers want to know that if something in the workplace is unsafe, management is going to support them in making it safe for themselves and others.

Ken Rayner:

Right on. Adam, with many other podcasts we do, we love to point our members towards free resources that we have available from IHSA—in many cases on our website. Do you have some free resources that you'd recommend I as a small business owner should consider utilizing from IHSA that will help me create my policies, practices, and procedures?

Adam Carruthers:

Absolutely. There are several out there. We start with our *Construction Health and Safety Manual* (M029), which is actually free for members who pay their WSIB premiums. It's a great spot to start for developing your practices and your procedures. It contains general industry best practices to get started. I actually used this extensively when I moved over to construction, to get started developing those safe work practices. You can also download individual chapters on the IHSA website today. We also have a policy and program template under our Resources for Small Business webpage. That has some examples and templates for developing policies and procedures for organizations. Also, as part of our National Construction Safety Officer (NCSO®) and National Health and Safety Administrator (NHSA™) certification requirements, there's a free *Health and Safety Policy, Practices, and Procedures* webinar available on our website.

Currently, organizations have an opportunity with the WSIB's Health and Safety Excellence program to receive a financial incentive to develop certain aspects of their health and safety program.

Just something to call out for federally regulated businesses: they can also find resources under our Road Safety Solutions page on the IHSA website.

And finally, reach out to our customer service team; get connected with one of our health and safety consultants. It costs nothing to ask a question. Our consultants are hired as subject matter experts in their field and are more than willing to help guide you in the direction of regulations, legislation, and other online resources that the IHSA has available to offer.

Ken Rayner:

Amazing. So we'll make sure those links are up on our website. So you mentioned the *Construction Health and Safety Manual* (M029). That's fantastic. That's been the bible for many years in construction for helping companies develop their processes. We will make sure that on the small business page, where we have the policies and program templates, we'll provide that. The webinar you mentioned as well as the road safety solutions. So thank you. Great tips, Adam. Appreciate that.

Now, if we can agree that the health and safety policy statement states the “what,” then the program supporting it must be the “how,” right? And if you look up today, based on today's current version of the *Occupational Health and Safety Act*, in the front part of the book there is no definition in the Act for the word “program.” So what guidance would you provide to a small business owner such as myself on how to construct a program to support the health and safety policy statement?

Adam Carruthers:

Depending on the goal of the company, it can actually vary. If you're starting from scratch and are looking to have a certified health and safety program...in particular, right now in Ottawa, Toronto, or any other municipality that's requiring COR® certification, looking at that standard as you develop your health and safety organization system, you need to have it be proactive in the development. So barring that, my personal experience has been to network with other safety professionals. Look at online resources for information, whether it's the IHSA, Workplace Safety and Prevention Services (WSPS), the Canadian Centre for Occupational Health and Safety (CCOHS), or any other online resources.

I will say a word of caution: if you are getting information from online resources, such as samples, for example, it's important to review the information to ensure that it is relevant to your organization and it is relevant to whatever jurisdiction you're currently in. Because there are tons out there. Whether it's the United States, Alberta, or British Columbia, you need to make sure that it is applicable for the jurisdiction that you're in and for your company and where you're actually working.

When it comes to developing procedures, practices, and controls, it's going to be extremely beneficial to conduct a detailed hazard assessment of the jobs and tasks that you perform to identify the hazards and risks that the workers may be exposed to. Performing that good hazard assessment, again, would require a level of competency. Because a small company may never have completed a hazard assessment before, let alone been trained on how to perform one effectively.

Ken Rayner:

Okay, thank you for that. And we've got some podcasts that address hazard assessments, so our listeners can go back and review those again if that's beneficial. Talking about scalability, Adam, what steps can I take as a small business owner with six employees to develop and maintain a program that's really applicable to the business of my size? I don't want to be running it like an organization with 500 people or 1,000 and make it really complicated. It should be scalable to my business. And I believe that would be quite different in size and scope if we're looking at a company with six employees compared to one with a few hundred or 1,000. So how can I make it clear and concise for my workers? How can I make it easy to follow and comprehend, based on the fact that I have six workers and not 100?

Adam Carruthers:

Good question. Throughout my career, developing policies and procedures is not so different, regardless of size. I've developed them for organizations that have had thousands of workers across Canada and organizations with 150 workers. But my goal was always to keep it simple. I always found that reviewing policies and procedures that were in place—either provided by an external provider or a predecessor—the documentation typically tried to be more complicated than it had to be.

So our folks in the field typically just want to be told how to do their job safely. So I developed templates that could be used consistently across the company. I always laid them out and I used a following method of writing the purpose of the policy procedure. So the why, the scope, who it applies to, definitions. Ensuring consistency across the program, clarification for certain terminology, responsibilities for your managers, for your supervisors, for your workers.

Also remember to include your joint health and safety committee or your health and safety reps, suppliers, subcontractors—especially if you're looking at COR® certification—the procedure, or the practice. So the “how,” how are you going to do this policy, this procedure, training requirements? So remembering that some tasks require specific training—some required through regulation—associated documents, or forms, like sign-offs, inspections, approvals. And then looking at any applicable legislation. So are there legal requirements required for the task that you're developing that policy and that procedure for? So if a worker simply wanted to know the procedure or the practice of doing a task, they could go straight to the procedure section while still having all that relevant information available to them if they wanted to know more. And that made it a lot more engaging for the workers. Because again, workers just want to be told, "How do I do my job safely? How do I go home safely?"

The majority of workers that I've seen, sure the regulations are there, the legislation's important, but we look at our construction projects COR®—we're so busy. I want to know how I'm being safe. When I have time, I have all this other stuff I can look at. So keep it simple. But that's a general layout that I've done for all of my policies and procedures over the last several years, and it's kept it consistent across the board. And when it comes to auditing, once you get to a stage where you want to be COR® certified—you have a consistent program in place, it looks great, your workers are proud of it—you can be proud of it, and it's going to be so much better, and it's going to keep your workers safer at the end of the day.

Ken Rayner:

Okay. So Adam, I've got a little bit of a problem now because I think based on everything that you've stated, I've run out of excuses to put off the policy development. I have no more excuses left. I've got to get on it. And I'm going to take your advice, and I'm going to look to provide something that is simple, not too complicated, and speaks to our staff at IHSA. To make sure it's applicable, easily understood.

And I'm not going to overthink it. So I appreciate the guidance. It's helped me out. I'm sure it's helped out other members of IHSA. I really appreciate the time that you spent with us today, Adam. Thanks a lot for your guidance on the documentation, why it's important and why we really need to pay attention to those policies, practices, and procedures.

Excellent. Thank you so much, Adam. And thank you very much to the listeners for listening to the *IHSA Safety Podcast* and our episode on the importance of documentation within an occupational health and safety management system. Be sure to subscribe and like us on your podcast channel and visit us at IHSA.ca for a wealth of health and safety resources and information.

Announcer:

The *IHSA Safety Podcast*. For more episodes, tips, and all things safety, go to ihsasafetypodcast.ca. Thanks for listening.

