



## SUBMISSION

ON THE DISCUSSION PAPER TO DEVELOP  
AN INTEGRATED OCCUPATIONAL  
HEALTH AND SAFETY STRATEGY

May 2013



As a business partner and expert in risk management, Workplace Safety & Prevention Services (WSPS) provides industry-specific health & safety solutions to help its customers achieve their goals and grow the life of their business.

Our solutions address economic realities and organizational risks, and help our 154,000 member firms achieve results that last: engaged employees, productivity improvements, reduced paper burden related to health and safety legislation and satisfied customers. The lasting results for our customers build a safer, more profitable Ontario.



## Table of Contents

<b>Organization of this Paper</b> .....	4
<b>WSPS' Approach to the Discussion Paper</b> .....	4-6
<b>Summary of Recommendations</b>	
Transformative Recommendations .....	6-7
Policies, Programs & Standards – Alignment Recommendations .....	7-8
Research – Recommendations .....	8-9
<b>The Voice of Customers</b> .....	10
<b>Strategic Conversion – The Workplace Parties Takes the Lead</b> .....	10
<b>Support for Those Most in Need</b>	
Vulnerable Workers .....	11-12
Small Business .....	12-14
High Hazard Activities .....	14-15
<b>Enhanced Services Delivery</b>	
Integrated Planning and Service Delivery .....	15-17
Innovative Partnerships .....	17-18
Support for Workplaces .....	18-21
<b>Meeting Changing Needs</b>	
Occupational Disease .....	20-21
Motivators .....	21-22
Research .....	22-23
Measuring Performance .....	23-24
<b>Conclusion</b> .....	24
<b>Appendices</b>	
Resources .....	26
Acknowledgements .....	26-28

# Workplace Safety & Prevention Services' Submission on the Discussion Paper to Develop an Integrated Occupational Health and Safety Strategy

## ORGANIZATION OF THIS PAPER

This paper is divided into a number of sections:

- Opening comments that describe the approach that Workplace Safety & Prevention Services (WSPS) has taken to the Ministry of Labour discussion paper;
- A summary of the top ten transformative recommendations and 14 other recommendations related to alignment and research;
- The Voice of Customers – an introduction to the detailed submission and who was involved;
- Detailed sections responding to each of the major topics in the discussion paper from which the recommendations are drawn; and
- A brief conclusion

## WSPS APPROACH TO THE DISCUSSION PAPER

The WSPS Board of Directors, Volunteer Council, Advisory Committees, and staff have collaborated on a series of discussions and interactions leading to the development of this submission, which is respectfully submitted for consideration in response to the Ministry of Labour's Prevention Office Discussion Paper released to support the overall development of an Ontario Integrated Occupational Health and Safety Strategy later this year.

WSPS provides these perspectives from a position and desire to build upon the existing strengths of this organization and those strengths that are available, within the system and externally, to grow the capacity and effectiveness of reaching and engaging more workplace parties in the outcomes and benefits of preventative risk management through investing in health and safety.

Ontario's next integrated occupational health and safety strategy requires a strong and

articulate vision that when activated has a voice, is visual and participatory; with a clear journey of solutions and checkpoints offered to workplaces; and, with a target goal of zero injuries, illnesses and fatalities. Ontario needs a strategy that will leverage its "whole community" – individuals, companies, government at all three levels with opportunities for everyone to play a role.

Given the diversity of options, sectors, hazards, best practices, and approaches that exist, we knew that we needed to engage the broadest possible views. For this reason our target has been performance-based outcomes that include entities and individuals beyond the traditionally identified pillars of prevention: the Ministry of Labour, the Workplace Safety & Insurance Board and the health and safety associations.

In our view, a true strategic review of occupational health and safety would look much more deeply and broadly than the range of questions identified in the discussion paper.

Key strategic questions would be, “Are we busy or are we effective? Are we changing our communities or are we transforming them?” These questions came to mind when reading the discussion paper because of work we have done with Dr. Jeff Linkenbach of Montana State University. They are key tenets behind the positive community norming model used by him when he worked with WSPS and a wide array of Ontario organizations to develop a province wide initiative entitled “Engaging Bystanders in the Workplace to Reduce Motor Vehicle Incidents”. The next question his model

leads us to is, “Are we seeking change or are we transforming Ontario’s health and safety performance?” Dr. Linkenbach’s distinction between change and transformation is captured in the table below. If we seek to truly transform the province’s performance, driving forward from the Expert Panel on *Occupational Health and Safety* recommendations, then we must engage all Ontarians, the system partners, the private sector, government, and communities in a strategy that ensures there is a role for everyone to play.

Change	Transformation
Temporary	Lasting
Surface level	Deep core
Combines same elements into new formats	New elements, synergistic reactions
More common	More rare
Easier to measure	Difficult to measure
Linear & stages	Quantum leaps
Current paradigm	Shifts paradigm
Support assumptions	Challenges assumptions

*The Montana Institute, Positive Community Norms, 2012*

Notably absent from the questions in the discussion paper is the objective of an ideal, normative operating model for the whole system and its partners, inside and out. Such a model would identify a supportive policy environment to ensure a fair and balanced mix of engagement without prescription, clear enforcement programs, and effective solutions that lead to sustainable strategies inside the workplaces of Ontario.

The content of this submission will address some core beliefs that WSPS maintains must be part of any future occupational health and safety strategy. It also will propose some new ideas that intentionally re-orient the focus of the strategy towards supporting the workplace parties who are the leading partners. The paper itself will provide a robust overview of the deliberations of over 140 organizations across the manufacturing, service and agricultural industries of Ontario who contributed to this submission.

From 2007 to 2009, in the Road to Zero strategy and then again in 2010, in the *Expert Panel on Occupational Health and Safety*, major changes were made to the roles and structures of the public organizations involved in health and safety. Ontario has moved from fourteen to six funded health and safety associations, legislatively moved the prevention mandate from the WSIB to the Ministry of Labour, and instituted new operating and reporting requirements under the Ministry’s Prevention Office. The questions that arise from this reorganization are, “What risks have been mitigated, or new risks identified, as a result of these most recent structural and policy changes? What new outreach to the broader market must this new strategy undertake to leverage the value and new capacity of both the new system structure and the new players who must no longer remain bystanders”, and “Who are these new players and how do they become activated?”

WSPS is aware that the Ministry's Prevention Office is also concurrently examining the market reach and depth of the health and safety capacity of Ontario; a new funding model for the entire occupational health and safety system and mandate and, the ongoing development of new standards, program reviews, and accreditation models. WSPS also recognizes the truly transformative work of the WSIB underway at this time. While not specifically addressed in the discussion paper, these elements have the real potential to trigger meaningful motivators and de-motivators (intended and unintentional) with the workplace parties and will directly affect the employers that fund the entirety of the occupational health and safety system. Alignment and integration should be principles brought to life inside a customer-centric service delivery model so that development of the system builds in the coordination and alignment necessary -- leading to the successful growth of new participants in the system and the extended capacity of all the traditional system partners.

## SUMMARY OF RECOMMENDATIONS

The recommendations are grouped into three themes: transformative; policies, programs & standards – alignment; and, research. Each has been drawn from the submission that reflects the voice of the customer and therefore the context of the recommendations are worthy of reflection after reading the whole of the submission together.

### Transformative Recommendations

1. WSPS recommends that the new strategy recognize that the workplace parties – employers and their workers – are the leading partners – and that the strategy's operational design elements be structured to support them in their work to improve workplace health and safety. The other broadly defined stakeholders and their activities should be aligned in such a way as to facilitate and support execution by the two leading partners.
2. WSPS strongly recommends that company-specific data shared with workplace health and safety organizations and private providers who elect to be a qualified provider, shall not be shared with any other organization unless aggregated to protect confidentiality. Without this guarantee of confidentiality companies will not share the detailed information essential to support them in their occupational health and safety (OHS) work and to improve OHS services. Consideration of the "Privacy by Design" principles would build in the necessary trust and reporting integrity needed to operate moving forward.
3. WSPS recommends the Ministry of Labour explore the concept of a mandatory qualification of knowledge of core health and safety facts and workers' rights before an individual may enter the workplace. This 'license to work' would be earned by all middle school, high school, college and university and apprenticeship entrants to the workforce. Several programs exist - so an equivalency standard is a good starting point. A critical mass of awareness would eventually be achieved through newly educated and licensed workers (part-time and full-time) attaining and maintaining their license of active awareness, along with the current mandatory worker and supervisor awareness training, resulting in a greater capacity for health and safety culture development in every workplace.
4. WSPS recommends vigorous outreach to newly formed and existing small business operators, focused on building their awareness and understanding of the importance of health and safety and providing training in bite-sized modules appropriate to the ability of these organizations to digest them. The priority channels of delivery should be self-serve, available 24/7, easily located and accessed, online, and affordable.
5. WSPS recommends information on an employer's responsibility for the health and safety of his/her workers be provided at the time of business registration as an integral part of the registration process. Information on services to assist in carrying out the obligations should be included. The implementation of the single business registration number (SBN) in Ontario will help to integrate this initiative as well as all the other licences and registration activities required by federal departments, provincial ministries and municipalities.

6. Further, WSPS recommends the exploration of whether there are efficiency gains and improved learning opportunities in allowing all small businesses to register for WSIB coverage through their relevant health and safety association with a single business registration number. The health and safety association could then engage the owner/operator before they begin to hire their first employee. The incentive for doing this could be that while the engagement between the health and safety association and the small firm is sustained and verified, the small business would qualify for reduced inspection for a specified period of time. This is a similar approach to the OSHA Voluntary Protection Program.
7. WSPS recommends the development of a family of performance-based standards for specific high hazard activities to complement the *CSA Z1000 Occupational Health and Safety Managed Systems Standard* and *CSA Z1001 - Occupational Health and Safety Training Standards*, which we support. WSPS further recommends more work be undertaken to develop specialist resources that can stay current with the advance of technology and business practices associated with emerging and unknown risks such as robotics and nanotechnology.
8. WSPS recommends the following high hazard activities as priorities for training standards:
  - Working At Heights/Fall Arrest
  - Elevated Powered Platforms
  - Electrical Awareness/Arc Flash
  - Confined Spaces
  - Lockout/Energy Control
  - Hazardous/Toxic Substances
  - Cranes and Hoists
  - Machine Guarding
  - Psychosocial

Occupational exposures resulting in:

- Dermatitis Illness
- Respiratory Illness
- Noise Induced Hearing Loss

The implication derived from this is an immediate need to define and release standards for competent trainers and qualified training organizations, along with standards for content

to support the occupational health and safety mandate.

9. WSPS recommends the development of an integrated awareness strategy for employee health, wellness and mental health that involves all stakeholders in the workplace, community and Government in identifying priorities for action, focusing on prevention, and getting critical information to workers and their families and communities.
10. WSPS recommends that the Ministry Of Labour reaffirm WSPS' mandate to provide core shared services to the other safe workplace associations and the requisite reallocation of resources to eliminate duplication and improve cost-efficiency. The Ministry Prevention Office should also avoid duplicating any activities, including data collection, of the associations. Employers have recently invested in WSPS (2010-2012) which now maintains the technology, the talent and capacity within one organization to support from a position of strength other elements of the system.

## Policies, Programs & Standards – Alignment Recommendations

11. WSPS recommends that the work, programs and accountabilities of the Ministry of Labour, the Ministry's Prevention Office and the WSIB, continue to be integrated and harmonized in order to provide employers and workers with a single, transparent consistent set of policy signals. These signals must seek to build a culture of workplace safety by encouraging the inclusion of OHS directly into business and corporate planning.
12. As a result, WSPS recommends all health and safety oriented programs of the Ministry of Labour and the WSIB be reviewed from an end-to-end continuum perspective to create alignment in the incentives, along with common metrics of accomplishment inclusive of both leading and lagging indicators. The establishment of this continuum of program options, with aligned incentive triggers must be done before adding any new prevention programs. An extended view of this alignment review has the future potential to include all those ministries that touch this mandate

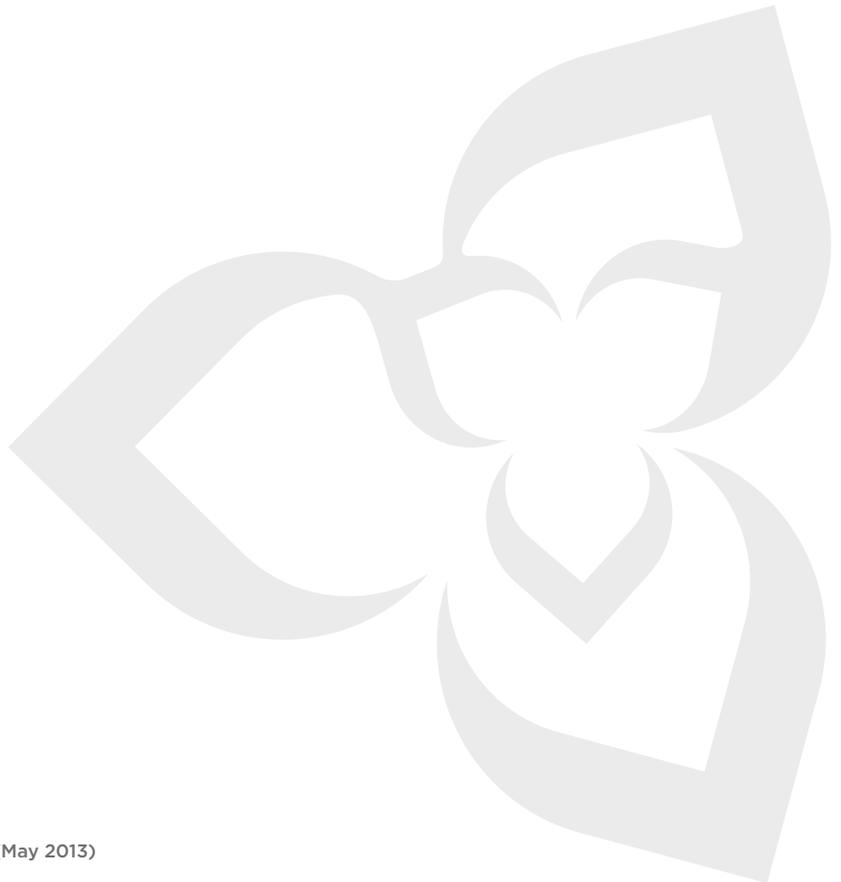
for the Ontario workplace – transportation, environment, health and long term care, education, colleges and universities and municipalities.

13. WSPS recommends all OHS partners develop a common definition of vulnerable worker that is based on a risk assessment approach that looks at the nature of the work, the characteristics of the workplace, and the attributes of the worker.
14. WSPS recommends the development of a package of tools and services that can be applied as appropriate to the needs and challenges of vulnerable workers in a specific situation. This package should be developed and continuously updated in close dialogue with a wide spectrum of OHS partners. The direct implication of this means the occupational health and safety system itself must vigorously pursue and embed an inherent capacity and competency for nimbleness and responsiveness and avoid a tendency for bureaucracy and processes. Building innovation, supported by a robust technology and social media platform, and new capabilities into the integrated system, will ensure a capability of renewal that all workplaces themselves experience rapidly today and require from their system partners.
15. WSPS recommends the Ministry of Labour lead an initiative to get tripartite agreement on the elements of the Internal Responsibility System, the role of Joint Health and Safety Committees, and the responsibilities of the two workplace parties. WSPS further recommends that the Ministry of Labour continue to make workers and their employers aware of employees' rights and to pursue vigorously those employers that do not respect the law.
16. WSPS recommends the development of an integrated awareness strategy for occupational diseases that involves all stakeholders in the workplace, community, and Government in identifying priorities for action, focusing on prevention and getting critical information to workers and their families and communities.
17. WSPS recommends the Ministry of Labour develop and implement along the integrated continuum, a series of appropriate non-monetary motivators, such as the OSHA Voluntary Protection Program in the U.S., all the way to larger scale corporate social responsibility (social opportunity) programs.
18. WSPS recommends a multi-year communications campaign using a variety of media, including social media, to raise public awareness of workplace injuries and deaths and to build public consensus for developing a culture of health and safety. The voice of the potential health and safety culture requires a commitment of 5 to 10 years of iterative communication and engagement strategies.
19. WSPS recommends the inclusion of compulsory occupational health and safety in the curriculum of all grades from six to twelve (middle school to secondary school); all trade and apprenticeship training; and professional qualifications in engineering and medicine prior to specialization, and business schools.
20. WSPS recommends the Ontario Government, as one of the province's largest employers and purchasing agents, set an example of the importance of health and safety by establishing mandatory OHS requirements in the procurement processes of the province and applying this to its entire supply chain for procurement.

## Research - Recommendations

21. WSPS recommends that a new, open, and transparent process be established for the governance of research priority decision-making and be developed to ensure that all workplace parties can be made aware of the process of how to apply; how to participate in the selection process of research priorities and, increased accountability for the grant values assigned.
22. WSPS further recommends a re-balancing of research grants and resources from pure research to the evidence of the efficacy of products, practices, solutions and technologies, and services.

23. WSPS recommends that it continue to maintain its role as an active intermediary between the OHS research community and the workplace parties for the purposes of developing resources, training material, and workplace services and solutions.
24. WSPS recommends four priority areas for research:
  - Basic and clinical research into occupational diseases and their causes, including nanotechnology;
  - Research into forward-looking measures of OHS performance; and
  - Social science research into how to build a health and safety culture in Ontario.
  - Applied research to improve workplace practices.



## THE VOICE OF CUSTOMERS

The WSPS Board of Directors, nine Advisory Committees, Volunteer Council and other volunteers and staff have all been involved in the development of this submission. A series of face-to-face facilitated meetings; one-on-one interviews with leaders and group surveys drew comments on the needs and requirement that customers want to see in the next integrated occupational health and safety strategy. Staff were also invited to attend the Ministry of Labour consultations and to support the development of this submission. A virtual and facilitated webinar also generated input from over 140 organizations and their representative themes and topics immediately began to emerge. Many of these coalesced into recommendations for transformation, alignment or research. The detailed sections below represent that conversation from the customer view point as the two leading partners of the system: employers and workers.

The development of the strategy is of great importance to the members and the industries we represent, who collectively employ more than 3.8 million Ontarians. This broad mix of knowledgeable professionals serving the cause of health and safety gives us valuable and unique insight into the needs of Ontario workplaces. In particular the nine Advisory Committees representing sub-sectors within the agriculture, manufacturing, and service industries give us a detailed understanding of the diverse workplace conditions and needs from the perspective of their sectors.

This submission represents the views of both the members of the WSPS and the WSPS itself as a stakeholder. It follows the organization of the discussion paper for ease of reference.

## STRATEGIC CONVERSION – THE WORKPLACE PARTIES TAKE THE LEAD

The discussion paper identifies (p. 9) three “key system partners”: the Ministry of Labour, the six occupational health and safety associations, and the Workplace Safety and Insurance Board. These three partners are then placed into a service delivery oriented model which has them driving action on OHS. WSPS and its members are deeply concerned by this starting point as it appears to leave outside the system the most important partners of all – the employers who run the workplaces of Ontario and their workers who work within them. In our view the two workplace parties are in fact the leading partners in the pursuit of OHS goals. This is fundamentally important to the development of a strategy for occupational health and safety because it is an area of public policy unlike most others. Public initiatives to pursue OHS objectives must be conceived and implemented very differently from other workplace policy objectives such as employment standards. OHS is simply not amenable to an approach whereby the Government administers and enforces the law. At best, this would only achieve minimum compliance. It works against the positive

engagement of the workplace parties required to build the strong OHS culture the paper claims to seek.

A strategic approach oriented to building a strong OHS culture places the workplace parties at the forefront of initiatives, asks what they need to accomplish the objective, and then aligns the other stakeholders – the Government, the WSIB, safety associations, other resource providers – behind them in support. This is a matter of fundamental principle. Instead of being the subjects administered and controlled by policy and regulations, employers and workers are the leading partners who execute the strategy. Ontario and other jurisdictions across North America have been evolving toward this conceptual approach for some time. For example, the implementation of Joint Health and Safety Committees 20 years ago marked a major step toward recognizing the lead role of the workplace parties.

Ontario cannot and must not go back to a model where government agencies “do health and safety” to or for workplaces. If nothing

else, government agencies lack the resources, skills, and knowledge to do it in today's diverse complex economy. The conclusions of this consultation process simply must drive Ontario further toward a strategy that supports and encourages the workplace parties to take the lead on OHS.

Some other key considerations drop out of this approach. All of the supporting partners must focus on and serve the needs and expectations of the workplace parties. At the simplest level, the work of the Ministry of Labour and the WSIB must be integrated so that employers and their workers have a single, transparent, consistent set of policy signals. But this is only the most basic of requirements. The government agencies and safety associations need to conceive their initiatives as support and design them to enable the workplace parties to apply the tools and services to their unique circumstances within their sector of the economy. It must be emphasized at this point that the services and support include elements to ensure active compliance such as inspections, enforcement measures, and sanctions for non-compliance. However, the larger goal always must be to build the culture. This demands close attention to how the supporting partners build the trust and confidence of the workplace parties.

Building a strong OHS culture requires that health and safety be integrated into the business and operational plans of employers. The vision is to move OHS from being an outside constraint to being an integral element of the organization's planning for future risks and opportunities. This in turn means that the supporting partners should market their services as a contribution to business planning and design them to be integrated into operational processes.

---

***What is required is risk-based analysis of the groups to achieve more precise definition of the challenges and needs that exceed the basic training that must be provided to all workers.***

---

## SUPPORT FOR THOSE MOST IN NEED

### Vulnerable Workers

We are concerned by some of the language in the discussion paper that seems to view vulnerable workers as victims-in-waiting. This is the wrong starting point to address the matter because it does not lead to clear thinking about the nature of the challenges or potential solutions. Current best practice in the occupational health and safety field is based on risk assessment. This approach is applicable to the matter of vulnerable workers and will lead to more effective action and better results.

When approached in this way, what immediately becomes clear is that vulnerability arises from three elements and the interplay among them – the nature of the work, the attributes of the worker, and the characteristics of the workplace. Vulnerability occurs when there is something among these three that creates risk factors that are outside the scope of the core training required for all workers. Some implications drop out of this. First, a worker who has not received the mandated basic training for his or her position is not by definition a vulnerable worker. He or she simply has not been adequately trained, and the required remediation is direct and obvious. Second, for the purposes of this approach, the lists of groups of workers and contributing factors in the discussion paper are too broad and general to lead to effective action. What is required is risk-based analysis of the groups to achieve more precise definition of the challenges and needs that exceed the basic training that must be provided to all workers. Once these are defined, a tailored package of responses can be developed. A third implication is that the approach to the situation must be holistic. Success will entail responsibility and action on the part of both the employer and the worker.

This approach does mean that the supporting partners will need a complex and diverse set of tools and services that can be drawn on to develop a package relevant to the differing needs and challenges of vulnerable workers. For example, reaching recent immigrants effectively requires more than communication in their native language. It may also require partnerships with community leaders, communications and

services delivered through community groups, or working alliances with ethnic or cultural organizations. An entirely different set of tools and services will be needed to serve workers who hold several jobs, each with a different risk profile. The ageing of the Ontario workforce is presenting employers with a new group of workers who could become vulnerable. One of the unique characteristics of this group of workers is that many will have worked much or all of their life in Canada, and will be in positions that they know well and have been able to perform safely and satisfactorily for years. This source of potential risk will rise significantly in the coming years, making it important to get ahead of this trend.

---

***...it would be worthwhile  
to explore the potential  
benefits of having new  
small businesses register***

---

This brief review of only a few groups of workers who could experience vulnerability indicates how important it is to understand the differing needs of workers with different physical, mental and learning needs. Ministry of Labour initiatives such as the *Vulnerable Workers Task Force* and *Small Business Task Force* are positive steps in understanding the needs and challenges of vulnerable workers, and the nature of work and workplaces that contribute to risk and vulnerability. We would urge that this dialogue extend beyond these two groups to encompass the full spectrum of workers, work, and workplaces because the conditions giving rise to vulnerability will continue to shift and change.

The system to identify and support vulnerable workers will truly have to be one built around a learning approach:

- A focus on small businesses that do not have the capacity to analyze the risks arising from the nature of their workforce, and their workplace;
- Extensive outreach to community-based organizations;
- More content in the curriculum addressed to issues of vulnerability; and

- Providing increased surveillance, primarily to identify risks and only secondarily to enforce and punish.

One final implication reinforces an essential competency of the system moving forward – that the integrated OHS Ontario system must be flexible, nimble and change-competent to sustain its relevance to the challenges and changes in the Ontario economy.

## **Small Business**

The discussion paper correctly identifies the central challenge of getting the attention of small businesses and facilitating their engagement when so much of their time and effort is focused on survival of the enterprise. The challenge is increased by the constant “churn” in this part of the economy, reflecting the short lifespan of so many of these businesses.

As many WSPS members observed: small business owners don’t know what they don’t know. Educating new business owners is a critical first step, helping new business owners to understand the business implications of health and safety. This will need to be done by meeting businesses where they are with a suite of tools that respond to their level of sophistication, in styles that they value. Our experience suggests that the most successful approach is not face to face; rather it continues to include a mix of: self-serve; 24/7 accessibility; online; and at a price that is achievable for the business owners. We cannot overemphasize the importance of providing these materials in bite-sized chunks, scalable to the needs of all businesses. Many members of our Advisory Committees summed it up well: the focus should be to make it easy to do the right thing.

When working with these companies it will be doubly important to demonstrate how OHS considerations are an integral part of business planning and operational management – not an add-on or outside obligation. A second design element will be to provide prepared packaged solutions that can be easily adopted and implemented. A third helpful element could be the engagement of knowledgeable peers who bring understanding, credibility, and trustworthiness. A promising way to do this could be through more active use of safety groups and the Safe Communities Incentive

Program (SCIP), designed and provided in formats more accessible to the operating realities of a small business capitalizing on technology and accessibility. They may be a way to improve the identification of needs as well as a channel for delivery of information, support, and services.

New small businesses represent a particularly challenging group of employers to reach. This may require some dramatic structural shifts in responsibilities in order to design a system to support them. For example, it would be worthwhile to explore the potential benefits of having new small businesses register with the relevant OHS association for WSIB coverage and pay their premiums directly to the association. The association would provide all the needed company information and transfer the funds to the WSIB, so there would be no loss of WSIB oversight or premium revenue. Making this immediate direct link could open the door for the business to automatically receive a stream of information and service carefully tailored to the needs of businesses starting up in that sector. It could reduce the administration burden on the WSIB. It might also help the Ministry of Labour focus its inspection efforts more effectively by enabling them to place a lower priority on brand new companies that have shown a willingness to comply with OHS legislation and regulations by signing up with their OHS association.

The OHS continuum identified in the discussion paper in Fig. A, p. 9 is particularly relevant to identifying the needs of small businesses and the tools that are most urgently needed. Given our understanding that many small businesses are not even at the stage of awareness, the services to concentrate on initially are those that will build awareness of the responsibilities employers have toward their workers and provide basic information that can be implemented immediately. This suggests attention to effectively communicating with businesses at the time they are forming – including information on OHS as well as other requirements such as registration for taxation, WSIB, etc. Ontario has a number of initiatives to support businesses at the inception stage such as *Service Ontario* and the *Small Business Enterprise Centres*. It would make sense to build health and safety information into the advice provided by these bodies and to integrate this work with the programs of the Ministry of Labour, WSIB, and workplace health

and safety associations. The next step would be the development of modular packages that give small business operators basic tools to identify the risks in their operations and then offer them packaged solutions that address the most common of these risks. A third element will be communication oriented toward workers in small businesses.

There is an important role to be played by Ministry of Labour inspectors in relation to small businesses. For the great majority of these organizations that want to be responsible corporate citizens the inspectors can be an effective means of raising awareness of basic obligations and directing the business toward resources. We are very aware that the role of inspector is a difficult one, requiring the individual to be an investigator, enforcement agent, and educator. These are not naturally complementary roles and finding the right balance is difficult, both in general terms and for each officer in each workplace that he or she visits. Small businesses in particular, are unlikely to have much understanding of the multiple roles played by an inspector. This places a responsibility on the officer to exercise considerable judgement in how he or she approaches each inspection. All we can suggest is that the inspectors not automatically start from an assumption that the business is deliberately non-compliant and unwilling to do so.

We recognize that at the margins of the small business community there are organizations that do not respect the law and do not carry out their obligations. Efforts to make all workers aware of their rights and obligations will help to identify the bad actors, and reliance will have to also fall on the inspectorate. We strongly support active measures to enforce compliance by these companies including orders and penalties. Ontario, like every other jurisdiction, has an underground economy of businesses seeking to carry out activities that are not permitted and/or to escape a variety of obligations that have been imposed by society. Vulnerability and unsafe working conditions generally can flourish in these workplaces. Inspections, communications to workers and the other standard tools in the health and safety toolkit are essential to address the risks in these workplaces.

Finally, there is an overall economic incentive to ensure that there is a fair and level playing field in running a safe and profitable enterprise in Ontario.

## High Hazard Activities

In our view high hazard activities are defined by the seriousness of the potential injury or illness. The discussion paper recognizes that there are a number of high hazard activities and that they will need to be addressed directly with measures relevant to the specific hazard. The paper also appears to recognize that it will be impossible to act on all hazards immediately, so that priorities will have to be set. We fully support this analysis and conclusion. The first task will be to identify the most common high hazard activities. The second is to place them in rank order using risk analysis, and then work through the list developing general standards for each. The current standards for forklifts and first aid are good models.

We are supportive of the *CSA Z1001 Occupational Health and Safety Training Standard* in establishing a reference point for OHS program design, development and delivery. Trainers play an important role in delivering health and safety in the workplace and need to understand their roles, responsibilities, and liabilities. The standard provides companies with guidance on developing, implementing, and maintaining appropriate OHS training programs and courses. It describes trainer competencies and qualifications to assist in selecting training providers and recognizing good training practices. The standard is also of great importance to workplaces needing to engage and rely on the competencies of third party providers or partners, such as health and safety associations, and to establish a baseline within their organization for their train the trainer programs.

While the CSA standard is a good starting point, it is written at a high level of generality. Both it and the *Dean Report* confirm the need for standards at the level of specific identified hazards and we concur with this assessment. It is important to note that these more detailed standards should be performance-based and not so prescriptive as to impede the workplace from implementing the intent in a manner that is most effective for their circumstances. The broad diversity and unique nature of workplaces

and the rapid pace of technological change require standards to be flexible and adaptable. Standards should articulate equivalency criteria to assist businesses that have been proactive and invested in training and education so that they have a way of demonstrating their equivalency when inspected or audited.

There is a serious lack of training standards or trainer accreditation methodologies supported by an audit program in many areas of occupational health and safety training in Ontario. As a result, there are many programs being offered by organizations that are insufficient to prepare workers to function and perform tasks safely in the workplace. Standards and accreditation programs are needed to raise the bar for the development of trainers. They are also a mechanism to achieve more than the minimums that the Occupational Health and Safety Act requires, providing guidance on how workplaces can execute on the concept of reasonable precaution and due diligence.

---

***...The broad diversity and unique nature of workplaces and the rapid pace of technological change require standards to be flexible and adaptable.***

---

The audit functions to verify that the standards are maintained in the training content and that the trainers' competencies and the training provider organizations contain elements that ensure fairness, integrity and accountability. Outsourcing these services should be considered in order to remove both the perception and the potential for any internal or external partner to exert unintended influence and, to mitigate the risk for potential conflicts of interest. The workplace parties must be assured that the appropriate standards have been achieved in their efforts to pursue sustainable occupational health and safety practices.

A growing challenge for the supporting partners is the increasing technological sophistication and complexity of work processes and substances.

This requires a degree of specialized knowledge and expertise that cannot be expected of an inspector or a generalist trainer. Consideration will have to be given to the process of providing specialist resources that can stay on top of developments relevant to the hazardous activity. Some of this may be possible within safety associations; other parts may have to be sourced from third parties – consulting engineers, suppliers, or others.

There is already a well-developed set of communications tools for the presence of risks such as hazardous materials, fire, radiation, or electrical shock. There may be potential to create additional consistent visual cues/symbols/pictograms for communicating hazard information. This could be especially beneficial for those workers with language and/or learning challenges. In an effort to address literacy and language challenges in Ontario workplaces, WSPS has collaborated with the Institute for Work and Health on the development of pictograms and training for workplaces. The intent of this research and solution is two-fold: to increase both awareness and the adoption of health and safety behaviors, and to produce hazard identification and control information that can be usable by vulnerable workers whose language/literacy skills are limited.

Our initial project was funded through the WSIB in 2009 and focused on addressing musculoskeletal disorders or slip, trip and fall hazards in four key workplace environments: prep kitchens (MSD), retail (MSD), industrial warehouse (Slips Trips Falls), and greenhouses (MSD). Since the inception of this project 46 pictograms have been created and are available as free resources on line at our website (wsps.ca) with accompanying training. Through the research project we were able to see an improvement in knowledge and a statistically significant difference was found for some practices at one and two months post-intervention observation.

Discussions with WSPS members identified some high hazard activities and circumstances that should be on the list of priorities:

- Working At Heights/Fall Arrest
- Elevated Powered Platforms
- Electrical Awareness/Arc Flash
- Confined Spaces

- Lockout/Electrical Control
- Cranes and Hoists
- Hazardous/Toxic Substances
- Machine Guarding
- Psychosocial

Occupational exposures resulting in:

- Dermatitis Illness
- Respiratory Illness, and
- Noise Induced Hearing Loss

WSPS has added psychosocial hazards to its list to reinforce the importance of integrating mental health into the efforts of workplace parties. The Government has a substantial role in relation to raising raise awareness and addressing employee health, wellness and particularly, mental health. Mental illness is a leading cause of disability in Canada costing an estimated \$51 billion per year, almost half of which is directly related to workplace losses. Beyond the socio-economic costs, workers with mental illness truly represent one of the most vulnerable populations that the OHS system ought to serve to its fullest extent. With the release of *CSA Z1003-12, Psychological Health and Safety in the Workplace*, and other ad hoc initiatives in support of the standard, a spotlight has been placed on these issues. WSPS was a participant in the development of this standard which we see as an important step toward generating much-needed dialogue and increasing awareness in aid of eliminating the stigma attached to mental health. Moreover, OHS now has an important evidence-based foundation for enabling employers to protect and promote psychological safety and health in their workplaces. However, only an integrated awareness strategy that involves and engages stakeholders from within and outside of the prevention system can ensure that the information will reach workers and their families, forming a positive impact on our communities.

## ENHANCED SERVICE DELIVERY

### Integrated Planning and Service Delivery

As noted earlier, the pursuit of improved occupational health and safety as a public policy objective is very different than other policy objectives. Regulation, investigation,

enforcement, and sanctions are necessary but are insufficient to accomplish the goal. Even broad basic compliance would be difficult to achieve using these policy tools. The reasons for this have been covered in the preceding sections.

Going beyond compliance to an OHS culture requires a strong customer-centric element to the delivery of service in order to win the active support of the workplace parties.. In turn this requires planning to be focused on understanding their needs and concerns. Best OHS practice is bottom-up, networked, and customer-driven. This is difficult to accomplish within government agencies that have legislated regulatory and enforcement responsibilities. By their nature these activities are top-down and centrally-driven, the antithesis of best OHS practice. Government agencies with legislated mandates that apply to the whole economy face significant challenges in understanding the wide diversity of workplaces and activities. Given their responsibility for investigation and enforcement, they face significant barriers to building and retaining the trust of the workplace parties.

Since the early years of the previous century, Ontario has looked to OHS associations to fill this critical, intermediary role between the workplace partners and the regulatory authorities. Until the last 20 years, the associations' work was concentrated on developing one-off tools and services to meet workplace needs. More recently, the associations have sought to move employers and workers beyond compliance to active commitment. As a result, they have become much more customer-centred and solutions-oriented. This has positioned them well to take the lead on integrating planning and service delivery:

- Identifying the specific and detailed needs of customers;
- Planning and developing the needed services, tools and activities;
- Integrating these into packages that address the general needs of different sectors;
- Developing packages that can be adapted and applied into specific workplaces; and
- Developing feedback/learning loops that facilitate continuous improvement.

As the Ontario economy has developed, organizations of all sizes in all sectors have had to invest more heavily in business planning. In our view, success in building a strong OHS

culture will come when OHS concerns and needs move from being an outside constraint or requirement to being an integral part of business planning and business success. OHS issues must become part of the risk assessment done at the first stage of business planning and the initiatives needed to address these risks must get built into the plan as it is developed, not “bolted on” at a later date in response to outside pressure. Achieving this vision will take considerable time and significant changes within customer organizations. We also believe that it can only be supported by organizations such as ours that have the two critical elements – knowledge and trust. These elements give the associations a degree of credibility that no other organization can reproduce.

---

***Health and safety  
associations know their  
customers better than  
any other partners in  
the system.***

---

Health and safety associations know their customers better than any other partner in the system. This understanding comes from their sectoral organization and reliance on industry leadership at both the strategic level (boards of directors) and the operational level (committees of volunteer OHS professionals). This volunteer engagement is essential to our success. There is an opportunity to take greater advantage of this potential throughout the OHS system. The system has an opportunity, and perhaps, an obligation to recognize and leverage the value of volunteerism to prevention. Imagine the possibilities with a network of passionate, committed professionals: their unique ability to connect the dots through the prevention landscape; their willingness to model the results of positive safety culture and mentor others; the benefit of a grassroots movement – walking the walk, talking the talk. Already, WSPS volunteers play this role: advocates, ambassadors, mentors, and guides. Volunteers extend our reach and build bridges to the diverse communities we serve. Any model relating to enhanced service delivery within the system would do well to

acknowledge the value of such a resource and give volunteers a major role.

The trust in health and safety associations comes from fact that they do not act in a regulatory or enforcement role and are guided by respected professionals from the customer body. This element of trust is particularly important because progress in health and safety often means being frank about shortcomings and vulnerabilities; admissions that are risky to make to an enforcement authority. This precious asset must be protected. It is therefore imperative that with the transfer of responsibility of prevention to the Ministry of Labour, we avoid any perception or concern that the OHS associations or private providers may be compelled to transfer data or information they gathered as a result of their trusted, confidential relationship with businesses to the Ministry.

The amalgamation of the safety associations from twelve to four was a good step forward. WSPS was given the mandate to be the central provider of a core of shared central services, but we were not permitted to execute this mandate thoroughly. As a result the full efficiencies of shared services have not been realized. We need more integrated shared services to reduce redundant work and redeploy resources to better serve workers and employers in Ontario. It should be stressed that this step must not mean duplication within WSPS of the capacity existing in other health and safety organizations. Resources should be reallocated and the amount of time and effort reduced where possible. This rationalization of work must also extend to the functions of the Chief Prevention Officer. There is no justification for creating centres of capacity within the Ministry that would duplicate and compete with the shared services mandate of WSPS or with the other activities and responsibilities of the health and safety associations.

There is an inherent value in the Ministry of Labour developing a related external business partner relationship with a qualified and trusted partner that can deliver solutions with nimble, responsive and evolving characteristics that Ontario's workforce and workplace parties need.

## Innovative Partnerships

The work with our members identified three themes that can guide the development of innovative partnerships:

- Drawing on, and adapting workplace solutions from other centres of health and safety innovation including other jurisdictions;
- Creating innovative partnerships with trusted industry, community and business partners, particularly in relation to initiatives to raise awareness and engagement; and
- Building the capacity of the Ontario System through partnerships with organizations recognized as leaders in specific types of solutions.

Ontario businesses do not operate in a vacuum. They learn and adopt practices, standards and approaches from across their industry and often times from across jurisdictions, built on evidence-based, industry-proven best practices. Many companies also do not operate exclusively in Ontario. As a result they need to develop a program that will be integrated into their business practices across jurisdictions. Partnering and cultivating alliances with centres of innovation and knowledge development across Canada will enhance the creation of effective programs to support the needs of workplaces and will allow companies to adopt standard approaches across their operations in different jurisdictions. Potential partners already include:

- Organizations in other provinces like "The Institut de recherche Robert-Sauvé en santé et en sécurité du travail (IRSST)" and "WorkSafe BC";
- Industry groups like the Canadian Agriculture Safety Association;
- Standard setting bodies like the Canadian Standards Association and Electrical Safety Authority;
- Organizations with unique specialized knowledge and services such as the Welding Bureau of Canada and the Radiation Safety Institute of Canada; and
- Research organizations with reputable sources of information such as The Canadian Centre for Occupational Health and Safety (CCOHS) and The National Institute for Occupational Safety and Health (NIOSH).

Cooperative work with groups such as these reduces duplication of effort, brings innovation to client workplaces quicker and increases consistency across operations.

We agree with the conclusion in the discussion paper that occupational health and safety extends beyond the workplace. We already have links with other stakeholders and sources of support such as community safety organizations, commercial service and product suppliers, and research bodies. The development of new relationships must, however, be driven by the needs of the customers. Some partners such as community safety organizations will have insight into needs gained from their relationship with the community they serve. Others such as researchers will need to build relationships with customer-focused organizations in order to know where their work will be best applied.

There is scope to go beyond the partnerships we have developed to date. Many workplaces turn to industry and community business associations, small business centres, and business partners such as financial institutions, as their trusted sources of information in developing and running their businesses. These can become effective complementary channels to promote and support health and safety in workplaces.

There exists tremendous opportunity to leverage the willingness of employers with solid health and safety programs to take on the role of mentors, particularly with small business. We would strongly urge the Ministry to support initiatives of business leaders who engage in designing approaches that leverage the effort of these business communities, to support the needs of small business, and identify and track the correct measures to ensure success. There is also a major opportunity for the full Ontario Government to take a leadership role in this area. Many corporations now require their suppliers to meet certain operational requirements that relate to corporate social responsibility goals. It should be possible for the Government to require all companies that supply it with goods and services to meet certain minimum OHS standards and to certify their compliance as part of the contracting process.

The arrival in Canada of a growing number of global reporting initiatives is an opportunity for the Ontario government to align its operating practices within this context and – given an

appropriate structure to support the practices of many small, medium and large enterprises that are required to act in this fashion, to secure lines of business around the world.

## Support for Workplaces

Another important role of government is to invest in awareness that positions the importance of workplace health and safety in a social context. This work would make a significant contribution to establishing a strong health and safety culture in the province. The use of social marketing to influence and inform the lifestyle choices of citizens has been a proven tool to effect broad-based change in at least two high-profile hazards: smoking and driving while under the influence of alcohol. Consistent investment in multi-year campaigns could have a significant impact on the way the citizens of Ontario think about workplace injuries and death. This initiative should consider varying approaches including leveraging all of the newest technology and broadest traditional channels that demonstrate the biggest impact to the most critical populations.

At times in the past some messaging to the general public in this regard has appeared to focus on blaming and finding fault. This approach does not help to build the culture we all seek. The seriousness of the risks and the challenges must be emphasized, but a change in public attitudes to OHS requires the same inclusive approach used in the smoking and drinking campaigns. This would also provide the other system and community partners with leverage points to maximize expenditures, develop solutions and coordinate their messaging.

WSPS has reached out internationally to develop support two campaigns focused on driving safety. The first used a positive community norms approach to build a culture of support for workplaces to reduce six risky driving behaviours – not wearing a seatbelt; reading or sending text messages while driving; using a cell phone (with or without hands-free technology) while driving; driving while fatigued, excessively tired or sick; driving aggressively or speeding; and driving after drinking any alcohol. With initial funding from the WSIB, this was developed in partnership with Montana State University's Center for Health and Safety Culture and a stakeholder

driven Motor Vehicle Safety Action Committee. For the second, we partnered with three industry organizations to pilot test the launch of a “Courageous Voices Create Safe Roads” campaign. Workplace specific norms were used to develop a personalized toolkit that included communication tools, posters, and materials to be posted throughout the workplace.

In view of this positive experience, we do not agree with the notion implicit in the discussion paper that individual workplaces can and should become self-reliant in achieving compliance with the Occupational Health and Safety Act and regulations. As we have argued above, the vision should be far more ambitious than simple compliance, moving toward a cultural change in the direction of “value-driven safety”. Second, the complexity of workplaces and the pace of change make it very difficult for even the very largest organizations to keep up to date using their own resources. Third, there are obvious benefits to common learning and the sharing of best practices.

---

***Probably the most valuable asset of the health and safety associations is their corps of volunteers.***

---

We believe OHS associations are well-placed to play a positive role in this regard. We already have extensive networks for the sharing and dissemination of information and best practices. We have expertise in-house and, through our volunteers, access to extensive workplace knowledge and experience. The OHS associations are well-placed to move beyond traditional system partners to building a more interactive OHS ecosystem within which problems and solutions can be discussed and shared. New technological tools permit the creation of content in multiple locations using a wide range of contributors. For example, crowd-sourcing is a technique ideally suited to tackling common OHS problems, disseminating best practices for dealing with them, and building internal feedback processes for continuous improvement.

Probably the most valuable asset of the health and safety associations is their corps of volunteers. Well-respected in their fields with significant influence, volunteers give their time generously to help instill a health and safety culture in thousands of firms across Ontario. From networking to peer-to-peer discussion to young worker training and out-reach to high school students, these tireless advocates are genuine ambassadors that help to amplify the OHS system. They act as leaders on boards, rural partners with county associations and health and safety trainers for high school and co-op students. Natural relationship builders, they promote positive change and are an integral part of the system. Offering their skills, knowledge and influence, WSPS volunteers participate in youth outreach programs, conferences and knowledge exchange events. Volunteers have stated their involvement with us is personally and professionally fulfilling and it has a positive impact on health, safety and wellness in their workplaces. WSPS advisory committees serve as a forum, providing industry-specific expertise. Committee members lend critical voices to their industry, helping us to set strategies by aiding us in identifying occupational health and safety issues, and emerging trends.

It is past time for Ontario to get serious about implementing the internal responsibility system (IRS). As a first step, OHS partners must reach agreement on a common understanding of the elements of the system. This understanding must include explicit recognition that both workplace parties – employers and workers, have responsibilities. We call on the Chief Prevention Officer to lead an initiative to achieve this. We agree with the discussion paper that Joint Health and Safety Committees (JHSCs) should play a major role in implementing the IRS. Their role was specifically cited in the findings of the *Campbell Commission Report on SARS and Public Health in Ontario*. It identified JHSCs as being critical to recognizing workplace hazards and recommending controls. This was also a finding of the *Dean Report*, which placed emphasis on the importance of the supervisory role in establishing organizational culture and the lack of mandatory training for health and safety representatives. We believe OHS associations have a wide range of products and services that can be drawn upon by JHSCs, HSRs and supervisors.

It may now be time to consider a backward extension of the IRS to include the concept of a “safety licence” or a mandatory exam for people to enter the workforce. Preparing workers for the workforce, “vulnerable” or not, makes sense – it ensures that all workers are receiving a consistent message while allowing employers to focus their orientation of new workers on the specific risks and hazards of their environment.

Other jurisdictions such as Nova Scotia have raised the profile of the IRS in the workplace by enshrining it in the Occupational Health and Safety Act, so that as a social norm it has the supporting force of law. This initiative is new enough that there is no evidence yet as to the benefit or effectiveness of such a step. We urge the Ministry of Labour to monitor the jurisdictions that have legislated in this way in order to learn from their experience.

## MEETING CHANGING NEEDS

### Occupational Diseases

By their nature, occupational diseases present complex and difficult challenges. This is exacerbated by the rapid advance of technology and the development of new production processes. More than anything, this area cries out for basic research to understand the diseases and their causes. This work can then be used to assess risks and guide the development of best practices.

It may be necessary to reframe how we think about and tackle occupational disease because this set of risks has a number of characteristics that make them qualitatively different from most other workplace risks:

- They require a greater need to understand the distinction between safety and health;
- Occupational diseases often involve a greater interdependency among workplace risks, lifestyle, and community environment;
- There is a greater geographic dimension;
- There is a need to involve and integrate the work of a wider set of partners; and
- There is a need for different communications approaches because of long latency and the potential presence of multiple causative factors.

A lot of OHS practice is centred on the identification of immediate risks to the safety of the worker and their prevention or remediation. Workplaces, understandably, tend to work on what can be identified and measured. However, occupational diseases do not lend themselves well to this approach. They present a set of challenges to the longer term health of the worker that cannot be easily or directly measured and thus must be approached differently. Increasing awareness of occupational disease, so that it is viewed on an equal playing field to injuries is challenging, especially with occupational diseases that have a gradual or latent effect. From previous occupational disease initiatives we know that although the burden of occupational disease is increasing, awareness among workplaces is low and may not be recognized as an immediate concern to tackle. Bringing forward a sound case for action, to incite workplaces to “prevent versus treat” is vital. Health and safety associations, as conduits to Ontario workplaces, are critical players to not only bring forward sector trends and insights to inform strategic thinking on priorities, but also to start the conversations with workplaces to put occupational disease on the radar.

The second challenge is to understand the complex relationships between exposure and multiple disease outcomes (e.g., asthma and dermatitis). Workers are exposed to hazards as a result of their work, their lifestyles, and the communities they live in. Building understanding involves not just a search for immediate causes, but also works to identify the interplay among the factors arising from these three sources. The Health and Safety System requires a strong lead to move forward an integrated and coordinated occupational disease strategy, drawing in external stakeholders, including public health, to make the connection among the workplace, lifestyle, and the community. There is a need to improve mechanisms for scanning, data mining, and sharing of information to identify occupational disease hotspots on the horizon, make connection points between workplace and community exposures, set priorities, and develop integrated prevention strategies. This work is also essential input for the development of policies and regulations to set standards for dealing with these risks.

Third, when it comes to occupational disease, size of workplace may be less of an issue

than geography. Previous experience with occupational diseases has revealed a marked spatial dimension to the incidence and severity of some occupational diseases. Diseases linked to mining are perhaps the most noteworthy examples. This means that the challenge is more concentrated and therefore more severe in some locations; it also means that there is scope to involve a geographically-focused set of resources on the problem. This would include:

- Collaborative partnerships with the research community to use available evidence to co-create tools/resources for workplaces;
- Front-line health and safety association (HSA) staff, and health care professionals with varying levels of complexity geared to the target audience;
- The Ministry, for a seamless hand-off to HSAs to assist with training solutions and consulting services in a region where a problem has been identified;
- The involvement of local health professionals, hospitals and community groups in identifying the presence of the disease and non-work-related causes; and
- Work to understand better local employer needs, how knowledge and solutions can be pooled, how occupational disease prevention can be integrated into their business, and how support can be accessed in their community.

The first three points implicitly identify the need for an integrated, systemic approach to occupational disease that brings in a very wide set of partners. We simply want to re-iterate the point so that it is explicit and the importance is recognized. Threats to health that have multiple, possibly uncertain, causes and that emerge only over time will implicate many partners within a community and beyond. This is easily said. The accomplishment will demand a great deal of analysis, organization, and integration of partners that are not used to working with each other and have a multiplicity of other responsibilities.

The final point follows naturally from this. Workers will need to be protected and have access to resources both within and outside their workplace. This makes their role and responsibility both greater and more complex. The other partners have a responsibility to work with and communicate to workers in an integrated way that mutually supports a

core set of messages. All these other partners will have their own communications objectives and styles, so there will be a need to achieve agreement on priority communications that present workers, their families and communities with the information necessary for them to protect themselves from the identified occupational diseases.

## Motivators

For many years employers have struggled with a dysfunctional mix of competing programs and policies run by both the WSIB and the Ministry of Labour in this area. This has hurt efforts to motivate more effective health and safety performance. We are hopeful that the location of responsibility for OHS in the Ministry of Labour and the creation of an office of the Chief Prevention Officer (CPO) will reduce the overlap and conflicting requirements. Clarity and consistency in the signals from the regulatory authorities is a necessary first step in providing stronger motivation to employers. There is significant work for the CPO and the WSIB in terms of integrating the desired outcomes and measures for tracking them, and then applying these to the various programs of the Ministry and the Board. This review and integration initiative should include the inspection service, Safety Groups, Safe Communities Incentive Program, experience rating, and WorkWell. The proposed prevention-based program review to be carried out by the CPO is a positive step. One essential outcome of this work must be a clear plan for how to make all of the various initiatives work together toward common objectives, using common metrics of accomplishment. This must be accomplished before any new prevention-based programming is contemplated. Adding a new layer on top of the current fractured infrastructure will not drive progress and could well hinder it.

It would be a mistake to think of motivators purely in terms of external initiatives and measures that influence behavioural change within workplaces. If the vision is truly to create a strong OHS culture it is necessary to integrate health and safety concerns directly into the plans and operation management of workplaces. This means that the motivators will need to be those that act upon an organization's planning process and can be integrated into the

performance indicators used by companies to track operational effectiveness.

Through the Experience Rating, Safety Group, and other programs of the WSIB, companies have financial incentives to improve their health and safety performance. As we urged in our submission to the *Rate Framework Consultation*, it is imperative that these programs be retained and improved with a view to providing clear, meaningful financial incentives for good health and safety performance.

Motivators can also be of the non-monetary type. In this regard it would make sense to look at what has worked in other jurisdictions for program ideas and for insights into what are the principles of effective motivation. For example, in the United States the OSHA regime operates a Voluntary Protection Program under which companies with superior performance undergo fewer inspections. Something similar to this might be effective in the Ontario system. A variant of this could also be an element in the earlier suggestion to register new small businesses for WSIB through their OHS association.

Corporate social responsibility continues to receive increasing attention from both the general public and individual corporations. The identification of areas of activity for which companies are considered to have a wider responsibility to society are broad and evolving, and would allow for excellent health and safety practice to be included. This would appear to offer potential both to influence company behaviour and to get the general public more actively engaged in health and safety. This could allow for excellent companies to be publicly recognized, or could become part of the evaluation used by purchasing companies to qualify suppliers. This latter measure is already used by some firms when sourcing in developing countries; it would not be a great stretch to develop similar measures to use when purchasing goods or services within Canada.

## Research

Elsewhere in this paper we have argued the need for occupational health and safety practice to be based more firmly on good quality research and

solid evidence. Both concepts – “research” and “evidence”, mean different things to different audiences. Research spans a broad range from pure scientific enquiry through to application into a particular workplace. Points along this continuum include peer-reviewed theoretical research, grey literature, best practices, case studies, program evaluation or experiential evidence. The evidence gathered is similarly diverse, from new insights into basic science through to “what works” from a practitioner’s perspective. Ontario needs to carry out research throughout this spectrum and to pick up on promising developments from other jurisdictions. Understanding and applying the research findings, or better yet, the body of evidence on a topic (i.e. from a systematic review), allows system stakeholders and Ontario workplaces to make more informed decisions about if and how system policies, programs and practices should be revised for continual improvement.

The research strategy and priorities must be informed by the needs identified by the stakeholder communities including worker representatives, employer representatives, health and safety professionals, disability management professionals, clinicians and policy and program advisors in the Ministry of Labour and WSIB. Ontario will never have the resources to pursue all avenues of research even if it develops an effective capacity to learn from other jurisdictions. Choices must be made, particularly between basic/discovery and applied research, and this will require the cooperative involvement of all of the stakeholders and a fair process for gathering and mediating their needs and concerns into a balanced set of priority initiatives. Ontario’s research agenda must transcend the politically-driven temptation to chase the “crisis of the day” and must consider multi-year funding mechanisms.

Research provides strategic value to Ontario workplaces so attention must be given to how the findings of research are transferred from where the original work was done to workplaces generally. A system built on evidence-based policies, programs, and practices enhances our credibility and will have a greater impact on reducing injury and illness outcomes. This system will need to recognize that there will be early adopters that are seeking research evidence to better their practices, as well as those that may

not be as aware of the value an evidence-based approach can have on improving health, safety, and business outcomes. A planned approach to identify target audiences for research uptake and adoption, and determine the best methods to reach the users of research is a starting point. Greater success with implementation will come from understanding our workplace stakeholders – both the problems faced and improvement opportunities – and identifying how research can help inform and contribute to a solution. Enhancing our system's capability to act as a two-way conduit will help align research with the needs of the workplace. This can be accomplished in part by being in tune with the research needs and appetite of our workplace stakeholders, capturing stakeholder-generated relevant research questions, and closing the loop by delivering back findings and supporting their implementation.

We believe WSPS can play a positive role in this regard; in fact, it already does so. We push-pull, link, and exchange to mobilize knowledge and put health and safety solutions within reach of every employer and employee in Ontario. Our work involves knowledge brokering to connect the research community with our stakeholders – staff, advisory committees, and clients – to engage in research projects, promote its use and the uptake of practical evidence-based tools. Being in sync with our stakeholders and delivering on their needs often requires two layers of translation of findings – from the research community to the HSA, and then from the HSA to the workplace. This approach has allowed WSPS to initiate applied research and program evaluations, and deliver results that can be integrated back into the workplace as information resources, training, solutions and services. Acting as a conduit and taking a hands-on approach to connecting workplaces with research, as well as helping them understand the value and impact it can have on their business, is critical to an integrated strategy. WSPS has experienced very positive outcomes working with the Centre for Research Expertise in Occupational Disease (CRE-OD). Using their programmatic approach to progressive research interventions has achieved results beyond one-off research grants.

In terms of specific subject areas, we believe research can make four important contributions to improving the OHS system. First as noted above, there is a need for basic scientific and

clinical research into occupational diseases to improve understanding of them, this includes ongoing research in nanotechnology and the potential risks. A second need is for applied research to develop and test forward looking measures of performance. Many of these will be qualitative in nature (e.g., level of engagement of workforce in health and safety, effectiveness of JHSCs) and therefore will require considerable work to refine and interpret. Third, there is a need for social science research into how to build a health and safety culture, identifying the barriers and then the tools that will lever a change in societal attitudes. Fourth, there is a need for applied research to improve workplace practices and how to intervene in workplaces to bring about improvements in practices.

## Measuring Performance

Planning processes in companies are increasingly using both retrospective and prospective indicators. There are already a variety of retrospective metrics for measuring accomplishments in health and safety such as claims cost. Unfortunately today these are not often used as an input to the risk assessment that is done at the start of planning. There may be value in understanding why this is the case and how these data can contribute to the planning cycle. There are few forward looking measures of OHS performance. We believe this is a fruitful area for research to identify and test potential measures.

It will be necessary for the Government to establish clear, firm ground rules about the collection, use, retention, and release of information generated by these measures. For a workplace to make progress on health and safety it will need metrics that provide a professional, honest assessment of successes and failures, especially the latter. It must be accepted that this information is strictly for internal use for performance improvement. If there is the slightest concern that a company's internal data could be appropriated by the Government, employers will be reluctant to gather this information for fear of self-incrimination. It may be possible for a trusted third party such as OHS associations to aggregate these data to assess system improvement, but there must be explicit guarantees protecting this information in the same way personal information is protected by the WSIB. None of this is to suggest that data reported in confidence to a trusted partner

like a workplace safety association is sufficient and necessary for the tracking of progress in the province. These self-reported data do have their limitations and there will be a continuing need for the Ministry of Labour, the WSIB and workplace safety association to collect other data about the performance and experience of companies, groups of workers, communities, and other groupings.

## CONCLUSION

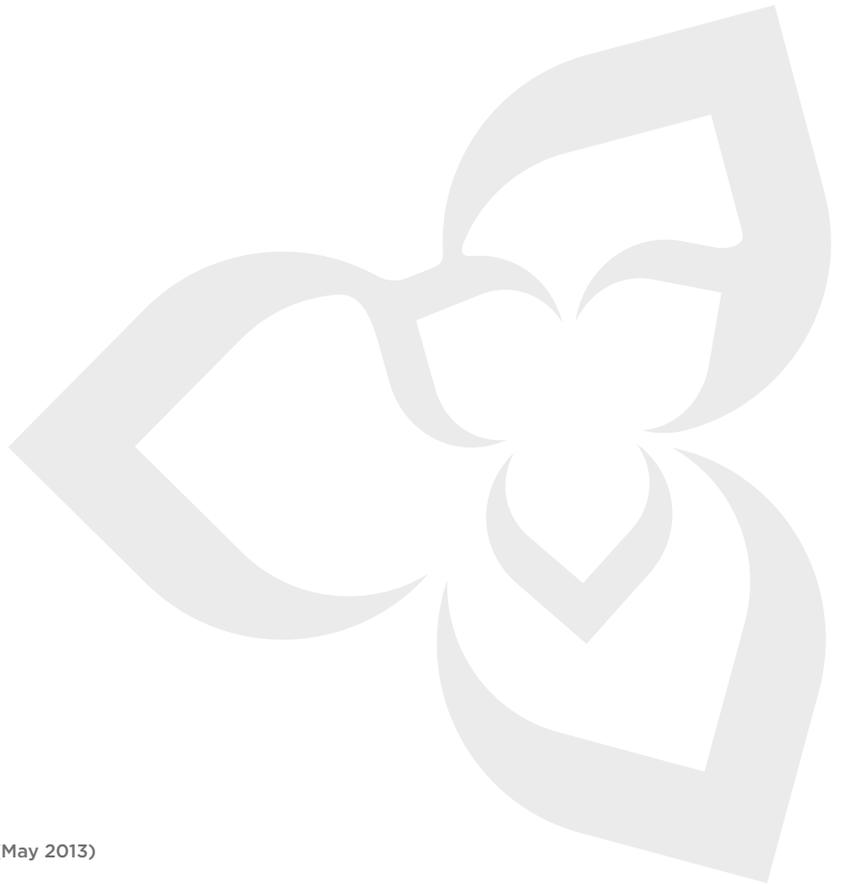
At the beginning of this submission we posed a key question that underlies our approach to it: whether we are simply changing Ontario's health and safety performance or transforming it? The two leading partners - Ontario employers and their workers - have made significant changes that have improved workplace health and safety in cooperation with the other supporting partners such as the Ministry of Labour, WSIB, and workplace health and safety associations. We also believe all of us have a long way to go if we wish to transform performance. In responding to the discussion paper this submission has identified ways to improve current performance. It has also tried to go beyond, to identify ways in which the partners could work toward a new paradigm that builds a culture of health and safety.

WSPS has a central role in pursuing both linear change and transformative shifts. We bring the passion and insight of our volunteers, the expertise and professionalism of our staff, and our extensive links within and outside of Canada to these tasks. As a business partner and expert in risk management, WSPS provides industry-specific health and safety solutions to help its customers achieve their goals and grow the life of their business. Our solutions address economic realities and organizational risks, and help our 154,000 member firms achieve results that last: engaged employees, productivity improvements, reduced paper burden related to health and safety legislation and satisfied customers.

The lasting results of our customers build a safer, more profitable Ontario.



# Appendices



## Resources: (alpha)

### **Collective Impact:**

[http://www.ssireview.org/articles/entry/collective\\_impact](http://www.ssireview.org/articles/entry/collective_impact)

### **Open Data:**

<http://www.ontario.ca/government/government-ontario-open-data>

### **Design Thinking:**

<http://designthinking.ideo.com/?p=51>

### **Small Business:**

<http://www.iwh.on.ca/sys-reviews/health-and-safety-programs-in-small-enterprises>

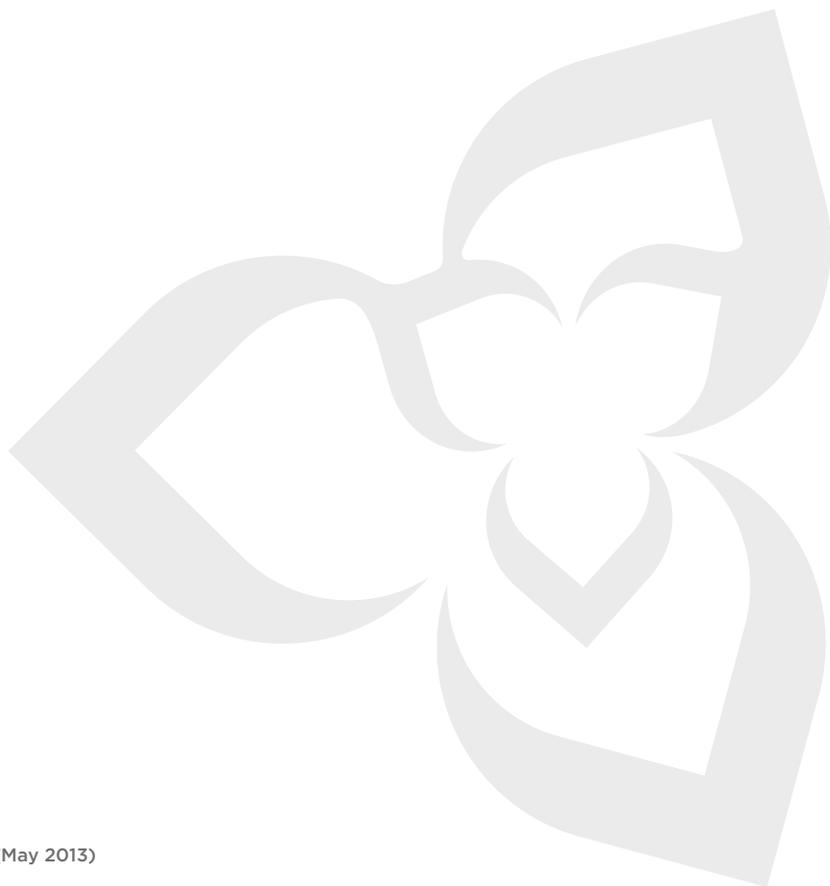
<http://www.iwh.on.ca/at-work/55/in-focus/small-business-ohs>

### **Leadership and Culture:**

[http://www.safemap.com/english/safety\\_leadership.html](http://www.safemap.com/english/safety_leadership.html)

### **Positive Community Norms (PCN):**

<http://www.mostofus.org/>



## Acknowledgements

Workplace Safety & Prevention Services wishes to acknowledge the following organizations who generously contributed their time and engaged their networks in gathering and sharing their perspectives, ideas and suggestions for this submission, demonstrating their commitment to enriching Ontario's next occupational health and safety strategy.

4-H Ontario	ClubLink Corporation
Aeropostale Canada Inc.	CN Tower
AGI - Shorewood	Cogent Power
Ainsworth	Collision Industry Information & Assistance
All Colour Paints Ltd	Com Dev Ltd.
Aramark Canada Ltd	Compass Group Canada
Arborvalley Urban Forestry Co Inc.	Constellation Brands Canada Inc.
ArcelorMittal Dofasco	Costco Wholesale Canada Ltd.
Aryzta/Maidstone Bakeries	Coursey Management Consultants
ATS Automation Tooling Systems Ltd.	David Lambert farms
Automotive Aftermarket Retailers of Ontario	Drake International
Avis Budget group Inc.	Drive Products
Bayview Flowers	DTZ- a UGL company
Bee-Clean Building Maintenance	E.I. du Pont Canada Company
Bell Mobility & Channels	Eastwood Wood Specialties Ltd.
Bioniche Life Sciences Inc.	Edson Packaging Machinery
Brookfield Lepage Johnson	EFI – Engineering for Industry
Bruce Garlough Farms	Fallsview Casino
Bruce-Grey Catholic District School Board	Farmers Mutual Insurance
Canada Bread Company Ltd.	Forthdale Farms
Canada's Wonderland	Frendel Kitchens Limited
Canadian Apartment Properties Real Estate Investment Trust (CAPREIT)	GAP (CANADA) INC
Canadian Bank Note Company	GE Canada (Healthcare)
Casino Rama	General Dynamics Land Systems Canada
CAW - Chrysler Canada	Giant Tiger Stores Ltd.
Celestica Inc.	Glasvan Trailers Inc.
Centennial College, School of Business	Good Life Fitness centres Inc.
City of Mississauga	Goodmans LLP (Retired)
	Greater Sudbury Housing Authority

Hi Berry Farms  
Highline Mushrooms  
HLS Linen Services  
HMSHost  
Home Depot of Canada Inc.  
Hudson's Bay Company  
Hydro One Networks  
INNOVAPOST INC  
International Supply systems  
Ipex Inc.  
Jackson Seed  
JOB Training & Development  
Keg Restaurants Ltd.  
Landscape Ontario  
LCBO  
Lear Corporation Canada Ltd  
Longos  
Maaco Systems Canada Inc.  
Magna International Inc  
Maple Leaf Foods Inc.  
Mars Canada Inc.  
Mary Kay Cosmetics Ltd.  
McDonald's Restaurants of Canada Ltd.  
Mercedes Benz  
Metro Ontario Inc.  
Metroland West Media Group  
Michael-Angelo's Market Place Inc.  
Midas Canada Inc.  
Mining Technologies International Inc.  
Molly Maid International Inc.  
Molson Coors Canada - Toronto Brewery  
Monaghan Mushrooms Ltd  
Mondelez Canada Inc.

Munro Concrete Products Ltd.  
MW Canada  
Nemak Corporation  
OK Tire & Auto Service  
Ontario Lotary & Gaming Corporation  
Ontario Accommodation Association  
Ontario Automotive Recyclers Assoc.  
Ontario Federation of Agriculture  
Ontario Power Generation  
Ontario Tire Dealers Association  
Optimum Talent  
Owens-Illinois Canada Corp.  
Oxy Vinyls Canada  
Patheon  
Pepsico Canada  
Perchlane Farms  
Piramal Healthcare (Canada) Ltd.  
Pizza Pizza Ltd.  
Procter & Gamble Inc.  
QSR Group Inc.  
Quality Meat Packers Ltd.  
Ramsden Industries Ltd.  
Robert Allen Horticultural Services  
Rona  
Royal City Nursery Limited  
Ryder Truck Rental Canada Ltd.  
Saputo Dairy Products Canada  
Sears Canada Inc.  
Service Inspired Restaurants  
SGS Canada Inc.  
Sleeman Brewery  
Sleep Country Canada  
Sobeys

Soul Restaurants  
Synnex Canada Ltd.  
T & R Sargent Farms Ltd  
Tannis Food Distributors  
Target Canada Inc  
Telus Communications Inc.  
The Beer Store & Brewers Distributors Ltd.  
The Salvation Army Canada & Bermuda Territory  
The Tourism Industry Association of Ontario  
The Woodbridge Group  
Tim Hortons Inc.  
TJX Canada  
Toromont  
Trillium Automobile Dealers Association  
TRW Canada Ltd.  
University of Guelph  
Vintage Hotels  
Wakefield Canada  
Walmart Canada Corp.  
Wendy's Restaurants Of Canada Inc.  
Weston Bakeries  
White Oaks Resort  
WIND Mobile  
Windsor Regional Hospital  
Woodbine Entertainment Group  
Workplace Safety & Insurance Board

