

COMPLIANCE: What You Should Know about Auditing Your OHS Program



The OHS laws in many jurisdictions require all or at least some employers to have an OHS program, that is, a comprehensive, formal system designed to identify and eliminate safety hazards and ensure compliance with the OHS requirements. Simply having an OHS program isn't enough, however. You must take steps to ensure that your program is effective. One way to evaluate the effectiveness of your OHS program is by auditing it. Regular audits identify gaps or areas that need improvement, and ensure compliance with the ever-changing OHS laws. In fact, some jurisdictions require regular reviews or audits of OHS programs. So here's a look at what you need to know about auditing your OHS program.

Defining Our Terms

Most OHS laws use terms such as health and safety program, occupational health and safety program or workplace health and safety program. Federal OHS law uses the term hazard prevention program, while in Québec, they use prevention program. And Alberta OHS laws refer to health and safety plans. For the purposes of this article, we'll use the term 'OHS program' to refer to all such programs/plans.

ONLINE TOOLS: Download and adapt an OHS Program Review Checklist and an OHS Program Audit Checklist, which you can use to audit your OHS program and determine whether it has the necessary components, complies with the requirements under the OHS laws in your jurisdiction and is effective.

5 KEYS TO OHS PROGRAM AUDITS

Audits can identify the strengths and weaknesses in a workplace's OHS program in areas such as accountability, policies and procedures, hazard identification and control, training and communication. When done properly, an audit or review will assess how well the OHS program complies with the OHS laws, guidelines and established best practices. Here are five key areas that you need to understand to ensure that your OHS program audit is done properly.

[learn_more caption="1. Whether OHS Program Audits Are Required"]

With the exception of Alberta, every jurisdiction requires at least some employers to have an OHS program and most of them require employers to review or audit their OHS programs regularly to assess the program's effectiveness and make any necessary updates. For example, in Nova Scotia and Prince Edward Island, an employer's OHS program must include provision for monitoring the program's implementation and effectiveness. And in New Brunswick, an employer must review its health and safety program at least once each year, in consultation with the JHSC or the health and safety representative, and must update the program as required. (This chart shows the OHS program requirements in each jurisdiction.)

In addition, even if your OHS laws don't specifically require OHS program audits, regular reviews or assessments of such programs are essential to ensure that they're functioning as designed, and effectively identifying and addressing safety hazards. Moreover, an ineffective OHS program won't help you prove due diligence. In other words, OHS program audits are 'at minimum' a best practice. [/learn_more]

[learn_more caption="2. How Often You Should Conduct an Audit"]

You should audit your OHS program on a regular basis. What constitutes 'regular' Under the OHS laws, how often such reviews must be conducted ranges from annually to at least every three years. In addition, you should also review your OHS program when:

- There's been a change in conditions in the workplace with respect to safety hazards, such as the introduction of new equipment or processes; and
- New information about a hazard in the workplace, such as an updated SDS, becomes available to you.

Lastly, you may need to audit your OHS program when an OHS inspector or other government official requires you to do so. [/learn_more]

[learn_more caption="3. Who Should Participate in the Audit"]

The parties that participate in your OHS program audit are likely to be the same ones who participate in workplace safety inspections. In other words, the company's safety coordinator, director, etc. should generally lead the program review. In addition, the JHSC or health and safety representative should participate or at least be consulted. In fact, their participation may be required under the OHS laws. And depending on the circumstances, you may need or want to involve an outside OHS consultant or auditor, who can provide an objective third-party perspective. [/learn_more]

[learn_more caption="4. How the Audit Should Be Conducted"]

OHS program audits usually have two components:

Document review. Most OHS audits include the review of key documents, information and data related to the OHS program and its performance. For example, under federal OHS law, an OHS program review must be based on the following documents and information:

- Conditions related to the workplace and activities of the employees;

- Any workplace inspection reports;
- Any incident investigation reports;
- First aid records and any injury statistics, including records and statistics relating to ergonomics-related first aid and injuries;
- Any observations of the JHSC or the health and safety representative on the program's effectiveness; and
- Any other relevant information, such as workers' comp records.

Interviews. Your audit should also include interviews of key workplace stakeholders, such as JHSC members, supervisors, plant managers, etc. In lieu of interviewing individual workers, you can use employee surveys to assess the OHS program's effectiveness.

You should also consider supplementing the document review and interviews with observations of the workplace to verify the information you've gathered, and to independently determine the extent to which safety hazards have been eliminated or controlled.

Insider Says: The box at the end contains some general questions that you should consider during the audit, and when reviewing documents and conducting interviews.

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[learn_more caption="5. Why You Should Document the Audit"]

You should document your audit of the OHS program, including how it was conducted, who was involved, the results and any necessary changes or updates made to the program based on the results of your review, such as the addition of new safe work procedures for newly identified safety hazards. The OHS laws may also require a report based on your audit. For example, federal OHS law says that when a program evaluation has been conducted, the employer must prepare a program evaluation report. In any event, documenting the audit may be critical to establishing that you conducted one and even to proving that you exercised due diligence. [/learn_more]

BOTTOM LINE

The word 'audit' can cause stress and tension, and strike fear in the hearts of those who hear it. But an audit is simply a tool that safety professionals can use to ensure that their OHS programs are compliant, comprehensive and effective. Yes, conducting an audit or review of your OHS program takes time and resources, but it's one of the most important due diligence steps you can take.

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General Questions to Consider During Audit

Here are some general questions to consider when conducting your OHS program audit:

- Is senior management directly involved in the program'
- Does senior management set an example'
- What's the nature and degree of incidents and emergencies that could occur in the organization'
- How does your organization compare with others in your industry'
- Is the work environment clean, well ventilated and adequately lit'
- Is every effort made to purchase tools, equipment and machinery with modern safeguards and hazard controls'
- Can existing tools, equipment, and machinery be retrofitted to include modern hazard controls and safety guarding devices'
- Are tools, equipment and machinery adequately maintained and serviced'
- Are the numbers of workers that supervisors must supervise too high'
- Are written policies, procedures and plans followed and if so, are they working properly'
- Are workers and supervisors involved in setting safety and health objectives and measurements'
- Are safety and health targets and measurements clear, crisp and clearly communicated'
- Does everyone know what's expected of them'
- Are people rewarded for excellence in safety and health performance as they are for excellence in other areas'
- Is the organization prepared to ensure managers, supervisors and workers carry out their responsibilities'

Source: SAFE Manitoba's Guide for Developing a Workplace Safety and Health Program [/box]