Hazard Identification Assessment & Control Policy



This Model Policy is based on best practices rather than specific regulatory requirements and can be easily adapted without the need for significant revision for any type of workplace, industry or jurisdiction.

1. **PURPOSE**

ABC Company has adopted this Policy to establish a cost-effective, workable, scalable, and flexible system to control workplace safety and health hazards as required by the [*province name*] *Occupational Health and Safety Act* ("OHS Act"), the associated OHS Regulations ("OHS Regulations"), the ABC Company Occupational Health and Safety Program ("OHS Program"), and other applicable requirements and standards.

2. **DEFINITIONS**

For purposes of this Policy:

- **"Administrative controls"** means the provision, use, and scheduling of work activities and resources in the workplace, including planning, organizing, staffing, and coordinating, for the purpose of controlling risk;
- **"Board"** means the [*name of workers' compensation board or other agency in charge of implementing the jurisdiction's OHS laws*];
- **"Competent"** means possessing knowledge, experience, and training to perform a specific duty safely and

effectively;

- **“Engineering controls”** means the physical arrangement, design, or alteration of workstations, equipment, materials, production facilities, or other aspects of the physical work environment, for the purpose of controlling risk;
- **“PPE”** means personal protective equipment;
- **“Practicable”** means that which is reasonably capable of being done.

3. **WORKERS THIS POLICY IS INTENDED TO PROTECT**

The intent of this Policy is to identify, assess, and control hazards that endanger the health and safety of **all workers** engaged to work at ABC Company work sites regardless of who pays or employs those workers, including:

- Full- or part-time workers employed by ABC Company;
- Temporary employees placed by an outside agency to work at the site;
- Contract labourers engaged to perform work at the site;
- Volunteers who work at the site for free; and
- Workers employed by constructors, contractors, and subcontractors to perform work at the site under a contract with ABC Company.

4. **POLICY**

ABC Company will use a three-phase system to protect workers, visitors, and others from the health and safety hazards of the workplace. This system is based on the principles of RAC:

R ecognition, i.e., identifying workplace safety and health hazards;

A ssessment, i.e., evaluating the urgency of and prioritizing hazards identified; and

C ontrol, i.e., selecting appropriate measures to eliminate or control identified hazards.

5. **PHASE 1: HAZARD RECOGNITION & IDENTIFICATION**

The objective of the Recognition phase of the ABC Company RAC system is to identify all hazards and potential hazards in the workplace in accordance with the following:

- Hazard identification will be conducted before work begins at a work site;
- Hazard identification will be done by at least one individual who is familiar with the OHS Act, OHS Regulations, OHS Program, and other requirements and standards that apply, and who is competent to perform hazard identification;
- Workers at the work site will participate in hazard identification, either directly or via their workplace Joint Health and Safety Committee ("Safety Committee") or Health and Safety Representative ("Safety Representative"), if one exists at the workplace;
- Hazard identification will include review of any data, reports, and materials generated under the OHS Program that are relevant, including but not limited to:
    - First aid records;
    - Injury and illness records and statistics for the workplace;
    - Recent workers' compensation claims filed by workers for injuries or illnesses at the work site;
    - Results of inspections of ABC Company workplaces and enforcement actions by the Board or other government officials or agencies;
    - Recommendations of outside auditors, consultants, or experts;
    - Hazards reported by workers;
    - ABC Company workplace incident reports submitted to the Board or other agencies in accordance with OHS laws;
    - Reports of internal incident investigations filed;

        - Records of recent work refusals by workers and how they were resolved;
        - Results of job safety observations.
    - After hazard identification is completed, a written report will be prepared listing, at a minimum:
        - The results of the hazard identification, including an inventory of all hazards in the workplace by associated job task or operation;
        - The methods used to control or eliminate hazards identified; and
        - The date on which the report was prepared.

6. **PHASE 2: HAZARD ASSESSMENT**

6.1. Methodology

The Assessment phase of the ABC Company RAC system will analyze the hazards identified during the Recognition phase and seek to determine the urgency by assigning a level of priority to each identified hazard in accordance with the following:

- Hazard assessment will be conducted before work begins at a work site;
- Hazard assessment will be done by at least one individual who is familiar with the OHS Act, OHS Regulations, OHS Program, and other applicable requirements and standards, and who is competent to perform hazard assessment;
- Workers at the work site will participate in hazard assessment, either directly or via the workplace Safety Committee or Safety Representative;
- Hazard assessment will analyze hazards associated with particular jobs, processes, and work areas;
- To carry out this analysis, the assessment team will make a list of all work activities, the tasks such activities involve, the component steps of each task, and the hazards associated with each step;

- The assessment team will also consider other risk factors including:
    - The physical demands of the work;
    - The physical environment in which the work is performed;
    - The machinery, tools, equipment, and supplies used to perform the work;
    - The physical characteristics of the workers performing the work; and
    - The specific procedures and methods used to perform the task.
- The hazard assessment team will rate the hazards using the following methodology:
    - The following 4 risk factors **will** be assessed:
        - Exposure—The likelihood that workers will be exposed to the identified hazard will be assigned a score of 1 to 6, with 1 representing the highest degree of exposure;
        - Occurrence—The likelihood of the hazard's bad consequences actually happening based on experience will be scored 1 to 6, with 1 representing the greatest likelihood of occurrence;
        - Probability—The likelihood that the hazard will happen at *some time* in the future will be scored A to E, with A representing the highest probability of occurrence; and
        - Consequence—The severity of the consequences were the hazard to occur will be scored 1 to 5, with 1 representing the most severe consequences.
    - The scores of each of the above four risk factors will then be combined to assign the identified hazard an overall risk rating of:
        - **High** for hazards with a Risk Rating of 1 to 6—to be treated as serious or significant hazards with the highest priority for

immediate controls or elimination;

- **Medium** for hazards with a Risk Rating of 7 to 15—moderate hazards with a medium priority for controls as soon as possible; and
- **Low** for hazards with a Risk Rating of 16 to 25—minor hazards that can be controlled after elimination or control of higher priority hazards.

6.2. Field Level Hazard Assessments

At work sites where operations and conditions frequently change, field level hazard assessments will be carried out each day before work begins. The hazard identification and assessment required by Phases 1 and 2 of this Policy will still be carried out at the site before the actual project begins—the purpose of field level hazard assessments will be to supplement and update, not substitute for Phase 1 and 2 hazard identification and assessment.

7. PHASE 3: HAZARD CONTROL

All reasonable steps will be taken to control hazards identified in Phase 1 on the basis of the assessment performed in Phase 2 in accordance with the following:

- If practicable, ABC Company will eliminate hazards;
- Where total elimination is not practicable, ABC Company will use methods to control hazards following this approach:
    - If practicable, ABC Company will use engineering controls to control the hazard;
    - If it is not practicable to control hazards using engineering controls, ABC Company will use administrative controls, including but not limited to development and implementation of safe work procedures to reduce the hazard to the lowest

level possible;
- Where it is not practicable to eliminate hazards or control them via engineering and administrative controls, workers exposed to the hazard will receive information, training and PPE; AND
- ABC Company will also use combinations of engineering controls, administrative controls, and PPE to the extent a combination of controls provides greater protection than any single type of control;

- Selection of hazard control measures will be done in consultation with the workers at the workplace, either directly or through the workplace Safety Committee or Safety Representative.

8. **CONSTRUCTORS, CONTRACTORS & SUBCONTRACTORS**

All constructors, contractors, and subcontractors hired to perform work at an ABC Company workplace will be notified of and required to comply with the terms of this Policy with regard to such work. Constructors hired to control work at ABC Company work sites will be required to follow this Policy and carry out the employer obligations assigned to ABC Company, or follow an alternative RAC policy that complies with the OHS Act, OHS Regulations and OHS Program, is suitable for the workplace, and provides at least equally effective hazard recognition, assessment, and control with regard to the work the constructor or contractor controls.

9. **TRAINING**

All affected workers will be:

- Notified of the hazards to which they are exposed;
- Notified of the engineering controls, administrative controls, safe work procedures, and PPE used to deal with them;
- Trained in the proper use of those controls, e.g., how to carry out safe work procedures, use the required PPE,

etc.

The above safety training and information will be provided:

- Before workers begin the work involving exposure to hazards for which the above safety training and information is required;
- When workers are assigned to a work activity different from the one they were originally trained to perform;
- When workers are moved to a different workplace or area of the workplace that has different facilities, procedures, or hazards; and
- When other changes in operations or equipment affecting or potentially affecting the worker's health and safety occur.

All workers, managers, supervisors, Safety Committee members and Safety Representatives employed by ABC Company must complete the health and safety training required for their particular position.

10. **REVIEW & EVALUATION**

10.1. Review of Hazard Identification & Assessment

Hazard identification and assessment required by Phases 1 and 2 of this Policy will be repeated:

- At reasonable intervals to prevent the development of unsafe and unhealthy work conditions;
- When a new work process is introduced;
- When a work process or operation changes;
- Before construction of significant additions or alterations to the work site; and/or
- In response to other significant changes to the work, environment, equipment, etc. that may render the current identification and assessment obsolete and not responsive to current conditions.

10.2. Review of Safety Controls

The effectiveness of selected hazard controls will be reviewed:

- As part of monthly workplace inspections;
- In response to circumstances suggesting that conditions have changed and that controls might no longer be effective, including but not limited to:
    - The occurrence of injuries, illnesses, incidents, accidents, or near-misses;
    - Complaints or concerns expressed by workers at the site, either directly or through their Safety Committee or Safety Representative;
    - After significant changes to the affected job or process's location, procedures, required equipment, etc.

10.3. Review of RAC Policy Itself

ABC Company will, in consultation with workers at the site, either directly or through the workplace Safety Committee or Safety Representative, review the effectiveness of this RAC Policy at least once a year or more frequently in response to incidents, changes, and other indications that the RAC Policy might not be effective and requires review.