

How to Perform an OHS Competency Training Compliance Audit



OHS laws require employers to ensure all workers have the training, information, instruction, supervision, and equipment they need to perform their particular job functions safely. There are also specific higher-risk, higher-skill jobs, functions, tasks, and duties that must be performed not simply by a worker who's received general safety training but also has demonstrated that they're capable of carrying out the job. This higher level of training and experience is generally referred to as being "competent" to perform the job (although some jurisdictions, including BC, Federal, and Yukon use the term "qualified" instead). Allowing persons who aren't "competent" to perform tasks requiring a competent person is a recipe for injuries and OHS penalties.

Example: An Ontario worker using an overhead crane to stack components of a press suffered fatal injuries after being struck by a moving 56,000 lb. metal plate. The crane had only been in the workplace for a few weeks at the time of the incident. The company was considering a training proposal from the crane's supplier but had yet to train its workers on safe use of the crane. The company was hit with a \$130,000 fine for failing to ensure that a competent person operated the crane [*R. v. Macrodyne Technologies Inc.*, [2003] O.J. No. 3582].

Most companies rely on their OHS coordinators to ensure

compliance with competent person requirements. To meet this responsibility, you should regularly perform a training audit to verify the following 6 things.

1. You Know Exactly What Competency Requires

“Competent” when used in relation to a work task or operation generally means that the person has the knowledge, education, training, and/or experience necessary to carry out the task in a safe, healthy, and legally compliant manner. However, [each jurisdiction has its own definition](#) of competent. Ontario has the strictest standards. To be considered “competent” in Ontario, a person must:

- Have specific knowledge of the OHS requirements that apply to the work and the hazards it poses (similar requirements apply in the Maritime Provinces); and
- Be able not simply to **perform** the job safely but also **organize**

Similarly, Alberta requires that a “competent” person not only be able to perform a job safely but do so with no or minimal supervision.

2. You Identify All Jobs Requiring a “Competent” Worker

Create a job description for each safety-sensitive task carried out at your workplace that lists the credentials a worker must have to perform the job. Make sure those listed credentials are in line with the competent person requirements of your jurisdiction. While rules vary, there’s an average of approximately 100 to 200 different jobs that must be performed by a “competent person.” Common examples:

- Conducting [noise exposure](#) and [confined space](#) risk assessments.

- Operating worker transportation vehicles, emergency equipment, cranes, [powered mobile equipment](#), and lift trucks.
- Operating a [powder actuated tool](#).
- Performing [welding](#), cutting, burning, and other hot work.
- Inspecting and maintaining [cranes, lifts, hoisting devices, scaffolds](#), and elevated platforms.
- Maintaining and inspecting [HVAC systems](#).
- Acting as a faller in a forestry operation.
- Installing and inspecting [fall protection](#) systems and equipment, formwork and shoring, guardrails, door openings, and suspended work platforms.
- Performing airborne tests for [asbestos operations](#), confined space entry, and other jobs involving potential [exposure to harmful atmospheric conditions](#).
- Handling and storing [hazardous substances](#).
- Handling [explosives](#).

Compliance Pointer: Go to the OHS Insider site for a Checklist of all tasks that must be performed by a competent or qualified person in [Alberta](#), [BC](#), [Ontario](#), and under [Federal](#) OHS laws.

3. You Identify All Jobs Requiring a “Qualified” Worker

In most jurisdictions, “competent” is only the lower range of a continuum of the kind of training, background, knowledge, and experience a person must have to perform a job. The higher range of the continuum is “qualified.” The latter is a higher standard that typically requires a professional degree, certification, or standing in a field. For example, work on or near highly energized electrical equipment, installations, and circuits may be performed only by “qualified” workers who’ve completed specialized electrical training or certification. Thus, merely being “competent” doesn’t qualify a worker to do

those jobs.

Things can get confusing if you're in one of the 3 jurisdictions (Federal, BC, and Yukon) that use the term "qualified" instead of "competent" to refer to the baseline qualification. However, even in these jurisdictions where "qualified" is basically a substitute/synonym for "competent," there are gradations of "qualified persons," with the OHS regulations spelling out the precise credentials a person must have to perform a particular kind of job. For example, in BC, tree pruning and falling within a specified distance of energized utility lines may only be carried out by a "certified utility arborist" who's completed a course of instruction, has a minimum of 1,200 hours of practical experience, and is certified by an authority acceptable to WorkSafeBC.

4. Workers Have the Training They Need to Be "Competent"

Be sure you have documentation of [written records documenting the training](#) you provided to workers performing competent person jobs listing:

- When the training was provided.
- Who provided it (the trainer must be competent to provide the training).
- What the training covered.
- When, if ever, the training was refreshed or updated.

You should also have records demonstrating that you took steps to make trainees demonstrate that they actually understood and were capable of carrying out the training they received. In addition, be prepared to document that you reviewed the training you provided to determine its effectiveness and identify the need for retraining or refresher training. These records will be one of the first things an OHS inspector who comes to your workplace will ask for.

5. Workers Have the Knowledge They Need to Be “Competent”

Knowledge is a key element of being competent. Expect OHS inspectors to ask workers specific questions to verify that they have knowledge of:

- Potential or actual hazards posed by the job.
- The tools and equipment required to perform the job safely.
- The workplace’s safe work procedures for the job.
- The relevant sections of the OHS law that apply to the job.

6. Workers Have the Experience They Need to Be “Competent”

Experience teaches you things you can’t necessarily learn through training or reading written materials. That’s why experience is a key component of competency. For example, a worker who has 10 years’ experience operating a lift platform or evaluating confined space hazards is more likely to be “competent” than a worker who just finished his training. Thus, [new or young workers](#), even with proper training and knowledge, are unlikely to be considered competent persons for OHS purposes.