

# Managing Your OHS Program: Give Your JHSC an Effectiveness Audit



As a health and safety pro, you understand that simply having an OHS program isn't much good if you don't regularly audit its effectiveness. The same principle applies to the joint health and safety committee (JHSC). The OHS laws say you must not only establish a JHSC ([Click here](#) to see when JHSCs are required in your jurisdiction.) but support, cooperate and consult with it. But what they don't require you to do is evaluate whether the JHSC is actually working effectively.

There is one notable exception. While several provinces recommend the practice, in April 2017, BC (OHS Regs. Sec. 3.26) became the first province to make it mandatory for employers to perform an annual evaluation of JHSC effectiveness. Even if you're not in BC, JHSC audits are highly advisable. Here's how to conduct them based on BC requirements, OHS guidelines from other provinces and private sector best practices.

## A. How Often

You should audit your JHSC at least once a year.

## B. When

Although BC doesn't stipulate a date, a good approach is to incorporate JHSC evaluation into your annual OHS program audit.

## C. Who

In BC, the evaluation must be performed by either:

- The employer or its representative; or
- The JHSC co-chairs or members designated by each co-chair.

If the employer or a rep does the audit, he/she must get the input of each JHSC co-chair.

## D. How to Prepare

You'll need to gather the materials you need to evaluate JHSC effectiveness, including:

- The JHSC's terms of reference, bylaws and procedures;
- Minutes of JHSC meetings;
- JHSC meeting attendance records;
- JHSC written recommendations;
- Records of response to JHSC recommendations, including corrective action reports;
- JHSC workplace inspection reports;
- JHSC incident investigation (including near misses);
- Records created by JHSC members involved in work refusals;
- JHSC member training and certification records; and
- Previous JHSC evaluations.

**Note:** In Québec, the JHSC must keep records tracking its own activities for the year and submit them to CNESST by March 31 of the subsequent year.

### **E. How to Audit**

The audit must be in writing and cover each of the JHSCs in the workplace.

### **F. What to Audit**

There are 2 broad themes around which to organize your audit:

- Compliance with the JHSC requirements of your jurisdiction's OHS laws; and
- The JHSC's overall effectiveness and actual impact on workplace health and safety.

Compliance: The 12 specific things BC requires employers to cover in the audit speak largely to the compliance theme, including whether:

- The JHSC has the proper number and types of members;
- The worker JHSC members were properly selected;
- The employer JHSC members were properly selected;
- The JHSC performed each of its required functions and responsibilities;
- The JHSC met regularly as required;
- The employer properly responded to JHSC recommendations;
- Each JHSC member got the time off required by law;
- The JHSC got the equipment, space, clerical information and information it was entitled to receive from the employer;
- The JHSC properly prepared and distributed its meetings reports;
- The employer met its duties with regard to posting and keeping JHSC information; and
- Each JHSC member received all of the instruction and training required.

Overall Effectiveness: While it's important to verify compliance, doing everything the law requires doesn't necessarily mean that your JHSC is effective. So, the audit should also focus on whether the JHSC is making a real and positive difference. BC Regs. say this but don't specify how'although WorkSafeBC guidelines flesh out some of the details. Based on guidance from BC and Nova Scotia and examples of private sector companies that actually do JHSC audits, questions to ask in assessing JHSC effectiveness include:

- Do members understand and capable of articulating the JHSC's role and extent of its authority'
- Do workers know the JHSC exists and what it does'
- Do workers know who the JHSC's members are and what they do'
- Do workers direct health and safety suggestions or complaints to the JHSC'
- Do supervisors consider the JHSC a threat or an ally'
- Do supervisors work with or around the JHSC'
- Do JHSC members reach out to workers, supervisors and management'
- Does the JHSC act fast to deal with matters brought to its attention'
- Are the JHSC's recommendations specific and realistic'

## **G. What Comes Next**

In BC it's mandatory and outside BC it's advisable to:

- Distribute a copy of the written audit report to both the employer and JHSC;
- Ensure the JHSC discusses the audit evaluation at its next meeting and records the discussions in the meeting minutes.

## **FOR MORE HELP ASSESSING JHSC EFFECTIVENESS**

- [Click here](#) for a JHSC Effectiveness Checklist that you can adapt for your own annual JHSC effectiveness assessment audit
- [Click here](#) for a Model JHSC Self-Assessment Questionnaire to use as the basis of your audit