

TRAPS TO AVOID: Failing to Provide Hazard-Specific Training



Providing general, generic safety training isn't enough. To comply with the OHS laws, companies must train workers on the hazards *specific* to their workplace, such as the dangerous substances they actually use or encounter. Failing to provide hazard-specific training will endanger workers and undermine the company's due diligence defence. Just look at what happened to a company in Ontario.

ON Court Says General Safety Training Isn't Enough

A roller in an Ontario sawmill got stuck and boards started to pile up. The worker operating the machine climbed onto the 'dump table' to manually push a board through it. He fell onto the machine and his hand got caught in the roller chain drive mechanism. Three fingers were amputated; all but one of them was reattached.

The company was convicted of three violations of the OHS law. The court described the company's training of its workers as 'very limited.' Workers got an annual safety course that related to general industrial safety, such as not working on equipment until it's locked out and wearing appropriate PPE. The training didn't relate to specific pieces of equipment. And the training the worker *did* get on this particular machine was 'brief, cursory and incomplete.' The worker didn't get *hazard-specific* training, such as what to do when a roller got stuck or how to shut down the line. As a result, he panicked when the boards started to build up. The court concluded, 'Generic, annual safety training did not exempt the defendant from providing careful instruction specific to the process in which the employee was involved.' It fined the company \$100,000 [*R. v. Grant Forest Products Inc.*].

SOLUTION: Provide Both General & Hazard-Specific Training

You should ensure the company provides two types of safety training to its workers:

General. Workers need general training that covers the OHS program, relevant OHS laws and basic compliance. For example, they should be trained on:

- The company's OHS program and the consequences for violating that program's requirements;
- Workers' rights and responsibilities under OHS law, such as the right to refuse unsafe work and protection from reprisals;
- Employers' rights and responsibilities under the law, such as the duty to provide a safe workplace;
- Workplace health and safety rules, such as basic PPE and WHMIS rules;
- Communication of safety information, such as the location of bulletin boards;
- Procedures for reporting safety and environmental issues and incidents, such as spills and injuries;
- General safety hazards, such as trips-and-falls and workplace violence;
- Location of first aid facilities and how to summon first aid; and
- Emergency procedures, such as when and how to evacuate.

Specific. You must also give workers training on the specific hazards, conditions, materials, substances and equipment they'll be exposed to on the job. For example, although you should train all workers on WHMIS in general, you must also train them on the specific hazardous substances present in the workplace and the precautions they should use when working with or near those substances. And workers should be trained on the specific equipment and materials they'll be using, including any hazards posed by those items, safe work procedures and troubleshooting procedures.

Insider Says: The general training should be the same for all workers. But you should tailor the hazard-specific training based on each worker's job. Of course, all workers in a particular position can get the hazard-specific training together. For more information, go to the OHS Insider's Training Compliance Centre or to SafetySmart.com, which provides safety coordinators with tools to help them reinforce learning and manage their safety program, such as safety talks, cost-of-injury worksheets and injury tracking forms. Not a Safety Smart member? Sign up for a free 14-day trial.

SHOW YOUR LAWYER

R. v. Grant Forest Products Inc., [2002] O.J. No. 3374, July 26, 2002