

Writing & Implementing an OHS Policy Statement – Compliance Game Plan



An OHS Policy is something just about all companies have. And there's a good reason for that: The OHS laws require you to have one. The OHS laws also say that the OHS policy must be a living, breathing document that people at the company actually refer to, review and modify as circumstances warrant. So, if your OHS policy is just lying around gathering dust, you're running the risk of liability. Perhaps more importantly, you're omitting to take a vital step in ensuring that your company has a vibrant safety culture. Here's a look at the legal requirements governing OHS policies and how to comply with them.

The Difference between an OHS Policy & OHS Program

While the terms are often used interchangeably, there's a big difference between an OHS policy and an OHS program.

An OHS policy is a written statement by senior management expressing the company's commitment to protecting the health and safety of its workers and listing the OHS responsibilities of management, supervisors and workers.

An OHS program is the substance that delivers on the OHS policy statement's commitment by providing for carrying out hazard assessment, prevention measures, safe work procedures, inspection, incident reporting, safety training and education and other crucial workplace safety functions.

How to Comply

Here are 12 steps to take to comply with OHS policy requirements:

Step 1. Put OHS Policy Statement in Its Own Document

In many jurisdictions, the OHS policy statement is actually one of the elements that the OHS program must include. But while you can combine the documents, you should also put the OHS policy in its own separate document.

Step 2. Consult with JHSC in Creating OHS Policy

Each employer must write its own OHS policy. As OHS coordinator, you'll probably be asked to spearhead this effort to write the OHS policy. The first step is to assemble the right people, including the workplace joint health and safety committee (JHSC) or safety representative or, if there's no JHSC or safety rep, the workers directly. In addition to being required by OHS law, consulting workers and their representatives makes common sense to the extent it gives them a direct stake in the OHS policy.

Step 3. Put OHS Policy in Writing

An OHS policy must be in writing. Oral and informal policies aren't enough.

Step 4. Use Clear Language

The OHS policy must be in clear language. **Best practices:** Gear the policy to an eighth-grade reading level, keep sentences short and avoid jargon.

BAD

Legislative health and safety requirements
Prior to
Comply/adhere to safety requirements
To the extent that
Encourage and promote the participation of workers
Conduct inspections
Review on a regular basis
Integrate good occupational safety practices into all their daily activities

GOOD

Health and safety laws
Before
Obey safety rules
If
Get workers involved
Inspect
Regularly review
Act safely at work and away from the workplace

Step 5. Express Management Commitment

Most jurisdictions require that the OHS policy express management's commitment to making the company a safe and healthy place to work and its promise to work with workers and the JHSC to achieve that goal.

Step 6. List Health & Safety Responsibilities

The OHS policy must spell out the safety-related responsibilities of various workplace stakeholders, including the employer, supervisors and workers. **Best Practice:** List the safety duties of the OHS coordinator, other managers, contractors and visitors.

Step 6. Include the Right Information

Some jurisdictions require or recommend that you include other information in the OHS policy, such as:

- The company's intention to treat OHS requirements as a minimum standard;
- The company's commitment to cooperate with the JHSC and provide the resources necessary to ensure effective implementation of the policy and monitor its effectiveness;
- How different persons with safety responsibilities will be held

- accountable;
- Who's responsible for safety in each area of the facility;
- A statement that working in a health and safe manner is a condition of employment; and
- Who'll review the policy and how often.

Step 8. Get OHS Policy Signed

The OHS policy must be signed and dated by a high management official:

- In AB, government guidelines clarify that the official should be the 'CEO or senior operations manager';
- In NL, it must be the 'employer or person responsible for management of the employer's operations in the province'; and
- NT, NU and ON government guidelines require a 'top' or 'senior' manager.

Step 9. Effectively Communicate OHS Policy

Some provinces, including MB, NL, NS and SK, require employers to post the policy in a prominent place at the workplace. MB guidelines recommend telling clients, contractors and suppliers about the policy and making new workers aware of it as part of their orientation.

Step 10. Make OHS Policy Accessible

You must make the OHS policy readily available to the JHSC and safety rep. You also have to give , as workers at the workplace and government OHS officials access to the policy if they request it.

Step 11. Monitor & Update OHS Policy

Monitor and, if necessary, update the policy, in consultation with the JHSC, at least once a year and more often in response to changes potentially impacting safety and/or indications that the policy isn't effective.

Step 12. Follow the Policy

Above all, ensure that people in your workplace are aware of and actually comply with the OHS policy. Failure to follow an OHS policy is worse than no policy at all because it's evidence of a lax safety culture in which management talks a good game but tolerates unsafe behaviours and safety violations.

Best Practices for Implementing an OHS Policy

Government guidelines of several jurisdictions list best practices for ensuring that people in the workplace take the OHS policy seriously and integrate its requirement into their work regimes, including:

- Making compliance with the OHS policy part of the performance review of each worker, supervisor and manager;
- Adding the health and safety responsibilities stated in the policy to the job descriptions for the affected positions;
- Referring to the policy during safety training and new worker

orientation;

- Giving new workers a copy of the policy when they're hired and making it clear that following the policy is a condition of their employment;
- Requiring contractors to follow the policy as a condition of the agreement and giving them copies of the policy before they start work;
- Giving suppliers copies of the policy;
- Posting the policy all around the workplace even if the law doesn't say you have to; and
- Most importantly, enforcing the policy consistently against those who commit violations up to and, if necessary, including termination.