USING A FORMAL AND DOCUMENTED OCCUPATIONAL HEALTH AND SAFETY PROGRAM TO PROTECT EMPLOYEES

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Over the past three years, SUMAssure has surveyed more than 150 facilities in subscriber communities to identify risk exposures to property and liability losses. From fire prevention to slip/trip/fall recommendations, SUMAssure's risk-control engineers have worked in partnership with urban administrators and councils to provide risk control reports.

These reports give the municipality the information and tools they need to eliminate, reduce, or mitigate the potential impact of those exposures to risk. The reports have also proved to be vital budgeting tools for SUMAssure's municipalities who now have the ability to prioritize spending based on the likelihood of or possible severity of a potential incident.

SUMAssure's 'point in time' risk-control surveys are a great method of working in partnership with municipalities to help identify, evaluate and control risk exposures. They also supplement the risk-control efforts, including Occupational Health and Safety (OHS) risk control efforts, which municipalities need to make day in and day out. The key is day-to-day efforts, usually by implementing a formal OHS Management System.

So what about the health and safety of municipal employees and contractors on a day-to-day basis? Are municipalities in Saskatchewan complying with provincial OHS legislation?

Keeping an urban municipality running well is a big job. Keeping the snow cleaned, the grass cut, and infrastructure maintained and operating to provide the many services citizens enjoy, involves many people. There are countless job tasks performed by municipal workers each and every day and these job tasks have varying levels of risk of personal injury. From heavy equipment operation to entry into confined spaces in water treatment plants, to work at height changing lights, there is risk of injury – even fatal injury.

In addition to municipal workers, there are often many different contractors engaged to perform work for the municipality. These contractors may work on everything from high-pressure equipment, ammonia refrigerant at the arena, underground work on municipal infrastructure (sewer, gas, water line trenches) to above-ground work on telephone and power lines. There are many questions around ensuring safety for contractors. Are these contractors

SUMAssure uses this risk matrix to categorize exposures to its members.

RISK MATRIX

Qualitative Measure of Likelihood		
Level	Descriptor	Description
A	Almost Certain	The event is expected to occur in most circumstances
B	Likely	The event will probably to occur in most circumstances
C	Moderate	The event should occur at some time
D	Unlikely	The event could occur at some time
E	Rare	The event may occur only in exceptional circumstances

Qualitative Measures of Consequence or Impact		
Level	Descriptor	Description
1	Insignificant	No injuries, low financial loss
2	Minor	First aid treatment, on site release immediately contained, medium financial loss
3	Moderate	Medical treatment required, on site release contained with outside assistance, high financial loss
4	Major	Extensive injuries, loss of production capability, off site release with no detrimental effects, major financial loss
5	Catastrophic	Death, toxic release off site with detrimental effect, huge financial loss

Qualitative Risk Analysis Matrix Level of Risk					
Likelihood	Consequence				
	Insignificant 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
A	S	S	H	H	H
B	M	S	S	H	H
C	L	M	S	H	H
D	L	L	M	S	H
E	L	L	M	S	S

H	High Risk – detailed research and management planning required at senior levels
S	Significant Risk – senior management attention needed
M	Moderate Risk – management responsibility must be specified
L	Low Risk – manage by routine procedures

working safely? What happens if they have an accident or fatality? What level of involvement does the municipality have when managing contractors? Is there liability to the municipality? Is there insurance coverage for fines, penalties, and legal fees? How do municipalities protect their workers and contractors? Is there personal liability to mayor and council?

The questions continue around OHS programs. What are the ramifications of an injured worker to a municipality if safety measures are done poorly or not at all? If the municipality has not started to put an OHS program in place, where do you start? What must be done to protect workers? How is this typically done? What resources are available to help improve OHS?

To answer the first question, the impact to a municipality in the event of worker injury can include the cost of:
• worker rehabilitation;
• WCB premium increases;
• rehiring; retraining a replacement; and/or
• hiring temporary workers.

But WCB costs are just the tip of the iceberg. Did you know that it is estimated that five to 53 times the costs of poor OHS programs are below the surface? You could be paying the price with things such as building damage, tool and equipment damage, product and material damage, and repair and replacement cost? There may also be miscellaneous uninsured costs such as accident investigation time, wages paid for time lost, the cost of hiring/ training replacement workers, overtime, extra supervisory time, and decreased output of an injured worker upon return to work. On top of all that, there may be fines/penalties failure to comply with the OHS legislation. All these costs aside, the reason for a good safety program is to protect your workers and contractors and is, quite simply, the right thing to do. No one wants to get hurt at work and no one wants to explain to the family of an injured coworker that they are not coming home from work today.

On the second question, all municipalities are employers and all employers must comply with Saskatchewan's OHS legislation. A great starting point to meeting your obligations is to fully review the actual legislation. You may also want training sessions from a consultant.

After reviewing legislation, it becomes clear that every employer has the responsibility to protect the health and safety of its workers. A good way to do that is to have a safety program to follow. Although legislation sets out the places of employment and employee count that trigger requirement for an OHS program, the mindset we're taking here is that the program is a good idea

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in all cases to guide safety efforts and ensure management of safety. As the saying goes, "*If we fail to plan, we plan to fail.*" So if your municipality has no safety and health program that it can hold in its hands, or if that program is not functioning properly, there may be increased risk of eventual employee or contractor injury. There is also potential for fines and penalties that follow from prosecutions for offence under the OHS legislation without a documented program.

Once you understand the legislation, you can move on to creating a customized program for your municipality. A written OHS program will provide an internal responsibility framework for the safety program to be properly structured and to function effectively. Traditionally, that framework often involves a safety committee or safety representative and various volunteer members, working together to identify, assess, and control risk exposures to workers.

SUMAssure has engaged Aon Risk Solutions for a great deal of its risk-control efforts and Aon's consultants work with their clients in both the public and private sectors every day to help develop a structure and risk assessment grounded approach to safety program development. Often, when building what Aon calls an Occupational Health and Safety Management System (OHSMS), Aon follows a process known as *Plan – Do – Check – Act.* Municipalities will first need to plan out what will go into their OHSMS to control risk exposures, and will need to implement the many aspects of the OHSMS to control the identified risks. Municipalities will next need to check and monitor what they have implemented, and determine if it is effective at reducing/eliminating risk of injury. Lastly, municipalities will need to act or take corrective action to improve

the OHSMS and its many elements.

There are many considerations when planning out the OHSMS scope – from reviewing asset lists to equipment inventories to categorizing the areas where work is performed and the many job tasks done by the municipality to reviewing and understanding the incidents/accidents that have occurred in the past.

One key area that is often missed in the planning/input stage is conducting good risk assessment, or taking a deep dive into the job tasks that are done by municipal workers, and listing out the contracted work done for the municipality. Using a process known as a Critical Job Inventory allows a municipality to dissect its many areas of operation down in to individual job tasks.

The next step is ranking those job tasks by likelihood of injury, severity of injury and exposure time and determining a job hazard analysis for each job task. Once this process is conducted it becomes much easier to know the scope of your OHSMS. The job hazard analysis can then follow for each priority/high-risk task identified, and safe work procedures and safe work practices will result from the development process.

Another aspect of the OSHMS is building policies and procedures that will help guide the organization in managing OHS risk. Typical policies may include, at minimum:
- Municipality OHS policy statement
- Risk assessment (identification of risk to health and safety of workers) and procedures for control of that risk
- Roles/responsibilities/accountability (town administrator, town foreman, supervisors, managers, workers, safety committee, contractors, suppliers, etc.)

- Emergency roles and responsibilities
- Safety committee terms of reference
- General safety rules
- Hazard assessment and control
- Disciplinary action
- Personal protective equipment
- Preventative maintenance
- Hazardous materials (biological or chemical substances)
- Training and communication
- Workplace inspection
- Workplace incident/accident and hazardous occurrence investigation and reporting
- Working alone
- Violence in the workplace
- Harassment prevention
- Mobile equipment
- Energy isolation/lock out
- Confined space entry safety
- Fleet safety management policies
- Public safety (slip/trip/fall prevention).
- A procedure to review and revise (where necessary) the safety and health program at set intervals (not less than every three years)

No doubt within the space of this article, it is not possible to delve deep into individual policies and procedures but we can ask two important questions:

1. Is your municipality relying on good luck, or are you actively managing safety?
2. Where do you begin?

Regardless of your municipality's answer to question one, you can always improve existing programs. Those that have yet to start formalizing and documenting a safety program have access to information and templates as starting points for a program specific to their municipality. SUMAssure subscribers can contact their representative for turnkey templates specific to urban municipalities. If your municipality isn't a SUMAssure subscriber, contact your insurance broker to see what they have at their disposal.

The old saying goes that *"the best time to start was yesterday and the next best time to start is now,"* but failing to start at all could prove very harmful to a municipality and/or one f its valued workers. ■