AUDIT INFORMATION

Audit Unit:	Health, Safety and Wellness	**Distribution:**	Chris Kroes, Health & Safety Coordinator
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Date Issued:	December 3, 2018	**cc:**	Nancy Shea-Nicol City Solicitor
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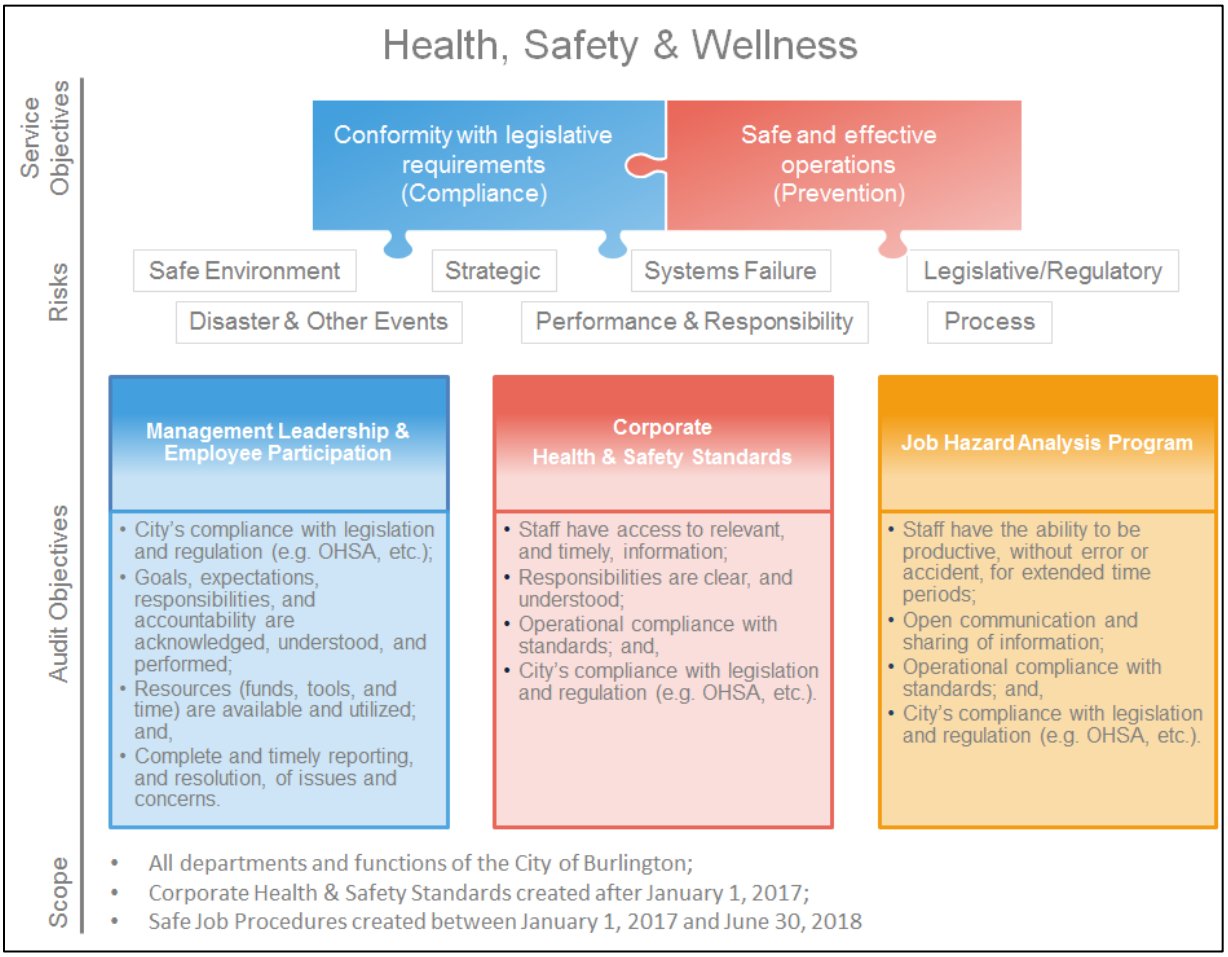
SUMMARY OF AUDIT RESULTS

Area of Focus



SUMMARY OF AUDIT RESULTS

Audit Period

This audit included information and material from the period January 1, 2017 to June 30, 2018.

What is Working Well

Health, Safety & Wellness Climate and Culture Survey

- The overall positive agreement with most of the statements in the Health, Safety & Wellness Climate and Culture survey suggests there is a viable climate and culture for health, safety, and wellness. Refer to **Appendix 1** (page 11) for the Executive Summary from the Health, Safety and Wellness Climate and Culture Survey - Results & Analysis Report - Final and the overall results in chart format.

Management Leadership and Employee Participation

- The City's 2018-01 Health and Safety Policy Statement addresses physical and mental wellbeing and references employee and employer responsibility.

- The Director Human Resources has designated responsibility for health, safety and wellness throughout the organization.

- Responsibilities are clearly documented in available position descriptions and contain a health & safety statement reflecting the City's expectation of employees to work a) in an environmentally friendly way, b) in a manner that is safe for themselves and others, c) to be aware of their health & safety obligations, d) continually look for opportunities to improve their job, e) recognize the uniqueness of the individuals, and f) treat individuals with dignity and respect. In addition, Duties and Responsibilities sections of position descriptions contain specific Health, Safety & Wellness statements dependent on the position.

- Awareness and understanding of health, safety and wellness programs, hazards, and protection against injury is strongest in those areas where service delivery involves manual intervention, use of equipment and machinery, use of chemicals, ice and water.

- Documented standards exist and are being followed for reporting incidents. One suggestion is to remove names from the documented standard and reference positions to minimize the upkeep when personnel change.

- The use of training matrices is becoming popular. Training matrices provide details of all training and certification requirements dependent on position. The matrices developed for Roads, Parks & Forestry and Parks & Recreation include health and safety courses in their content.

- Joint Health & Safety Committees are required by the Occupational Health & Safety Act and are established as needed within city operations.

SUMMARY OF AUDIT RESULTS

Corporate Health & Safety Standards

- A process is in place to create, revise and communicate corporate health and safety standards throughout the organization. Broad collaboration is encouraged in the drafting of these comprehensive standards. The request for review and comments could be enhanced by drawing the reader's attention to key areas of the standard (e.g. scope and application, roles and responsibilities, etc.) where comment and feedback have the greatest impact.

Job Hazard Analysis/Safe Job Procedures

- A documented process is in place to provide guidance on hazard assessment and the creation and communication of safe job procedures.

- Safe job procedures were introduced in early-mid 2017. Since this implementation, interviewed staff could readily describe the difference between a safe job procedure and a standard operating procedure. This differentiation is important as it indicates staff know what information to refer to for safely operating equipment.

Findings by Severity

(See definitions on Page 23)

Category	High	Medium	Low
Management Leadership & Employee Participation	-	2	2
Corporate Health & Safety Standards	-	-	-
Job Hazard Analysis/Safe Job Procedures	-	-	1

Refer to **Appendix 2** (page 14) for details of the audit findings and recommendations and **Appendix 3** (page 22) for additional observations.

Overall Rating Good

(See definitions on Page 23)

Why?

Processes and activities are in place to support health, safety, and wellness in the City and to achieve conformity with legislative requirements and safe and effective operations. There is opportunity to enhance and improve the management system to continue the integration of policies and programs into all management activities. Full integration is a foundation for success and reinforces that management of health and safety is not an optional extra to existing management and supervisory activities.

Health, Safety & Wellness Climate & Culture Survey

- Analysis of the results suggest
  - There is a gap in engaging staff on a regular basis providing an opportunity to improve communication with and among management and staff. Through two-way communication, management and staff can actively engage in a conversation about what is working, how things are working, and what staff can see as the solutions.

- An opportunity exists to explore ways to increase the visibility of the inspection, the inspector, and the results of inspections across the organization.
- There is an immediate need to address the “don’t know” responses within the management role. The use of an infographic could provide key information through one document, allowing for placement at finger tips, on bulletin boards and at other employee gathering spots.

Management Leadership & Employee Participation

Strategy & Implementation

- There is no overall long-term (3 to 5 year) strategy and implementation plan to describe:
  - The City’s current environment,
  - The goals, objectives and principles for future state of health, safety and wellness within the City,
  - How these goals and objectives align to corporate strategy,
  - The level of risk the organization is willing to tolerate with respect to health, safety and wellness,
  - The programs, resources, and timelines needed to accomplish the objectives, and
  - Relevant leading and lagging performance measures.

Training, Communication and Monitoring

- For 6 of the 48 employees’ training records, at least one of the required awareness or Workplace Hazardous Materials Information System (WHMIS) courses have not been completed.

- Within the sample of employees, the assigned review for communications of corporate health and safety standards is inconsistent.

- Five of the 48 employees have not completed review of Corporate Health & Safety Standards (CHSS) communications as assigned through Our Training Room (OTR).

- Close to 20% of the sampled employees had some form of incomplete event, be it training or review of CHSS. Through interviews, it is apparent there is a weakness in the monitoring process.

Closing Comments

We thank management and staff in Human Resources and throughout various departments of the City of Burlington for the cooperation and support extended to us during this audit. A solid response to the Health, Safety & Wellness Climate and Culture survey came from staff in all departments including front line, team leader/coordinator/supervisor, and management levels. In addition, 48 staff members from various areas willingly participated in discussions about their awareness and understanding of health, safety and wellness policies and practices.

Management Comments

Health and Safety is a joint responsibility of both Corporate Health and Safety and the Management teams within each department. It is critical for supervisors and managers to understand that they are responsible to ensure hazards are controlled and that workers receive the required training and information on the hazards. The HS&W team will continue to provide the framework, tools and technical information (e.g. Standards, regulatory requirements, best practices) to supervisors/managers to support them in this responsibility. Safety and risk reduction processes are not an optional extra task, if time allows – they need to be integrated into everything we do as mandatory and resources need to be provided to achieve this. HR can improve on lagging indicator reporting so that departments can track their performance more readily; in addition, targets may be established to encourage efforts to improve performance. HR will be reporting quarterly at BLT on these metrics and more.

Human Resources (HR) – Health, Safety & Wellness
HR is an internal service to provide City staff human resource functions including health, safety, wellness, compensation and benefits, recruitment, learning and development, and labour/employee relations.

Health, Safety & Wellness is a sub-service with multiple responsibilities:

- Help staff, who develop an illness or have an accident (while at work or outside of work), return to work in a safe way and on time.
- Ensure the workplace is safe,
- Measure attendance and adjust responsibilities to help the employee return to and stay at work,
- Manage the employee assistance program, and
- Provide education on living a healthy life.

Organizational Context
Human Resources: Two Hats - One Department
"Corporate services are activities that combine or consolidate certain enterprise-wide needed support services, provided based on specialized knowledge, best practices, and technology to serve internal (and sometimes external) customers and business partners."[1]

The HR Department wears two hats:

- Corporate – providing transaction processing and functional and advisory services in support of other departments (e.g. Fire, Finance, Transit, etc.) and strategic HR management to support the City as a whole, and
- Department – managing their own internal processes and operations.

From a corporate perspective, health, safety and wellness is aligned to functional and advisory services. This includes the provision of guidance, tools, direction and advice and subject-matter expertise. The current health, safety and wellness program includes hazard assessment and prevention, incident investigation, development of standards, training program development and delivery, and Joint Health & Safety Committee functions. This functional and advisory service is available to every department and can influence all employees, whether full-time or part-time.

From a department perspective, there are activities performed by HR staff to support their own department in achieving its objectives and complying with corporate health, safety and wellness policy and directives. For example, completing required training, being situationally aware and observant of hazards, etc.

[1] http://en.wikipedia.org/wiki/Corporate_services

Health, Safety & Wellness in Departments

One of the challenges in providing corporate functional services, such as health, safety and wellness, is who owns the responsibility for the implementation or fulfillment of the department level activities in the departments.

HR, wearing its corporate hat, is the provider of corporate health, safety and wellness guidance, training programs, issue research, and templates. The departments (including HR wearing its department hat) are each responsible within their line of business for the implementation or fulfillment of these department level activities in accordance with corporate policy and procedures.

Therein lies the challenge, HR can provide the framework under which health, safety and wellness is to operate within the City, but it cannot be held accountable for the departments implementing and using the health, safety and wellness guidance, training programs, and templates.

In its corporate role, HR is the steward of functional services and by definition, stewardship is "conducting, supervising, or managing of something; especially: the careful and responsible management of something entrusted to one's care"[2]. While HR can't make departments fulfill health, safety and wellness activities, HR has a responsibility to monitor the situation to know when the departments are not fulfilling their responsibility, to assess the reasons why, and to help resolve those issues.

Staffing

Corporate health, safety and wellness programs and work involve:

- Director, Human Resources: overall responsibility for health, safety and wellness in the organization;
- Human Resources Consultant – Employee Health & Wellness: primarily deals with employee wellness and disability management;
- Health & Safety Coordinator: primarily deals with health and safety including risk assessments, joint health & safety committees, communication, training, records management, and accident/incident investigation. In addition, researches and develops corporate health and safety standards; reviews and revises when necessary.

There are 7 Joint Health & Safety committees whose management and worker representatives have specific responsibilities. Among the worker members' responsibility is performing workplace inspections.

Internal Partnerships

All management and staff are part of the internal responsibility system (IRS) meaning everyone in the workplace has a role to play in keeping workplaces safe and healthy.

Legislation and Regulation

Occupational Health and Safety Act R.S.O. 1990, Chapter O.1.

[2] http://www.merriam-webster.com/dictionary/stewardship

O. Reg. 381/15	Noise
O. Reg. 297/13	Occupational Health and Safety Awareness and Training
O. Reg. 33/12	Offices of The Worker and Employer Advisers
O. Reg. 490/09	Designated Substances
O. Reg. 474/07	Needle Safety
O. Reg. 632/05	Confined Spaces
O. Reg. 414/05	Farming Operations
O. Reg. 278/05	Designated Substance - Asbestos on Construction Projects and In Buildings and Repair Operations
O. Reg. 385/96	Joint Health and Safety Committees - Exemption from Requirements
O. Reg. 243/95	Criteria to Be Used and Other Matters to Be Considered by The Board Under Subsection 46 (6) Of Act
O. Reg. 714/94	Firefighters - Protective Equipment
O. Reg. 629/94	Diving Operations
O. Reg. 67/93	Health Care and Residential Facilities
O. Reg. 213/91	Construction Projects
R.R.O. 1990, Reg. 861	X-Ray Safety
R.R.O. 1990, Reg. 860	Workplace Hazardous Materials Information System (WHMIS)
R.R.O. 1990, Reg. 859	Window Cleaning
R.R.O. 1990, Reg. 858	University Academics and Teaching Assistants
R.R.O. 1990, Reg. 857	Teachers
R.R.O. 1990, Reg. 856	Roll-Over Protective Structures
R.R.O. 1990, Reg. 855	Oil and Gas - Offshore
R.R.O. 1990, Reg. 854	Mines and Mining Plants
R.R.O. 1990, Reg. 852	Inventory of Agents or Combinations of Agents for Section 34 Of the Act
R.R.O. 1990, Reg. 851	Industrial Establishments
R.R.O. 1990, Reg. 834	Critical Injury - Defined
R.R.O. 1990, Reg. 833	Control of Exposure to Biological or Chemical Agents

Audit Objectives

The audit objectives were categorized along three themes. This audit was conducted to assess the design and operation of controls to confirm:

- *Management Leadership & Employee Participation* - City's compliance with legislation and regulation (OHSA responsibilities of employers and employees Section 25, 26, 27, and 28, Section 43 (3) and (4)); goals, expectations, responsibilities, and accountability are acknowledged, understood, and performed; resources (funds, tools, and time) are available and utilized; and, complete and timely reporting, and resolution, of issues and concerns (i.e. JHSC).

- *Corporate Health & Safety Standards Program* - staff have access to relevant, and timely, information; responsibilities are clear, and understood; operational compliance with standards; and, City's compliance with legislation and regulation (e.g. OHSA, etc.).

- *Job Hazard Analysis Program (including Safe Job Procedures)* - staff can be productive, without error or accident, for extended time periods; open communication and sharing of information; operational compliance with standards; and, City's compliance with legislation and regulation (e.g. OHSA, etc.).

Audit Scope

Specifically, the audit included:

- All departments and functions of the City of Burlington;
- Corporate Health & Safety Standards created after January 1, 2017;
- Safe Job Procedures created during the audit period;
- Review of documents, material, and information within departments and functions;
- Interviews and/or survey with management (i.e. directors, managers, and supervisors) and staff (a sample will be selected); and,
- Observation of activities within selected departments and functions.

The scope of the review specifically excluded:

- Material Safety Data Sheets (MSDS) program, sheet creation, sheet content, and dissemination;
- Pre-2017 Health & Safety Standards;
- Wellness programs; i.e. Employee/Family Assistance Plan (EFAP) Information, Disability Management, Fitness, Nutrition, Smoking Cessation, Psychological Health, Physical Health;
- Workplace Violence and Harassment program, policy development, implementation, and operations;
- Asbestos Management program;
- On-site delivered training programs;
- Agencies, Boards, and Commissions;
- External Contractors (i.e. not using any City resources)

Role of Management & Inherent Risk

Management is responsible for designing internal controls to lessen the risks in the service or activity and to meet the following objectives:

- Safeguarding of assets (including reputation)
- Compliance with laws, regulations and corporate policies
- Reliability and integrity of financial and operational information
- Efficiency and effectiveness of operations.

Risk Category	Risk Magnitude	Risk Definition
Process	High	Loss arising from transactions processing or process management.
Safe Environment	High	Loss arising from acts inconsistent with health or safety laws or agreements or from payment of personal injury claims.

Risk Category	Risk Magnitude	Risk Definition
Performance & Responsibility	High	Loss arising from failure to demonstrate accountability for key responsibilities.
Legislative and Regulatory	Medium	Loss arising from new/changing legislation and regulations.
Strategic	Medium	Loss arising from an internal and external events and scenarios that can inhibit an organization's ability to achieve its strategic objectives.
Disasters and Other Events	Low	Loss arising from loss or damage to physical assets and people from natural disaster or other events.
Systems Failures	Low	Loss arising from disruption of business services.

Legend:
High – significant/large/critical impact on City operations, financial results and/or image
Moderate – moderate/modest/sensitive impact on City operations financial results and/or image
Low – insignificant/little/subtle impact on City operations, financial results and/or image

APPENDIX 1 – EXECUTIVE SUMMARY: HEALTH, SAFETY AND WELLNESS CLIMATE AND CULTURE SURVEY RESULTS & ANALYSIS REPORT - FINAL

Background

This survey was conducted, on behalf of Human Resources, as part of an internal audit for health, safety and wellness. It is designed to help get a sense of what City of Burlington employees think about health, safety and wellness, what is working well, and where there may be opportunity to make enhancements to the city's programs that support this area.

Respondents

The survey generated 468 accepted[3] responses from a range of employees operating in 3 distinct roles, different work schedules, varying years of service, varying ranges of age, different work environments, and from all departments. Three characteristics are mandatory for respondents for the survey to be accepted: role within the organization, years with the city, and department.

Results Analysis

Overall

The overall positive agreement with most of the statements suggests there is a viable climate and culture for health, safety, and wellness.

This climate and culture provides an open and supportive environment for staff to express their concerns as demonstrated in the strength of agreement to "Where I work, I feel free to report safety concerns". While staff feel supported to *give* their concerns, the strength of disagreement to "Employees are regularly asked about their health and safety concerns" indicates staff do not feel supported in *being asked* about their concerns.

By Theme

The statements are aligned to four themes: communications/worker involvement, co-worker behaviour/safety systems, management commitment, and safety training/ equipment. When considering responses to the statements aligned to these themes, there is noticeable broad disagreement around communications/worker involvement. Overall, these results are the weakest by theme. Co-worker behaviour/safety systems shows more "don't know" responses than the other themes. Management commitment and safety training/equipment themes show the broadest agreement. When taken together, these results from these last two themes suggest a health, safety and wellness climate is active from training to operations.

By Role

The respondents fit into one of three roles: front line, team leader/coordinator/ supervisor, and management. The response profile for front line is almost the same as the profile for team leader/coordinator/supervisor. This reflection is possibly attributed to the relative

[3] Not included in survey results: 11 surveys not containing responses to all mandatory statements and/or demographics questions and 8 surveys received after the survey closed.

closeness of their working relationship. In most departments, team leaders/coordinators/supervisors are working directly with front line staff. The most apparent difference in response profiles exists between the roles of management and roles of team leader/coordinator/supervisor and front line. This difference in profiles is possibly attributed to distance in the working relationship; that is, managers, directors, and the city manager are office-located and may not be as prominent in the operating field sites.

An area of concern within the management response profile is the "don't know" responses for 12 of the 15 statements. This lack of knowledge and awareness at the management level may have a trickle-down effect on the level of knowledge and awareness of the team leaders/ coordinators/supervisors and front-line staff.

By Years with City

Employees in the 2 years or less grouping have higher "strongly agree" response rates for statements related to training, procedures, and level setting expectations. This heightened awareness is likely a reflection of being a new employee and the affect of orientation and training process may be fresh in their minds. This employee grouping also has the highest rate of "don't know" about health and safety committees and inspections.

Employees in the 11 to 19 years grouping have a higher "disagree" response rate for statements related to communications. This grouping of employees may feel less engaged because they are not being involved by being asked about concerns, involved in decisions affecting their person, and talks about hazards and how to control these hazards.

Opportunities

These results suggest there is a gap in engaging staff *on a regular basis* providing an opportunity to improve communication with and among management and staff. Through two-way communication, management and staff can actively engage in a conversation about what is working, how things are working, and what staff can see as the solutions.

These results indicate an opportunity exists to explore ways to increase the visibility of the inspection, the inspector, and the results of inspections across the organization.

There is an immediate need to address the "don't know" responses within the management role. The use of an infographic could provide key information through one document, allowing for placement at finger tips, on bulletin boards and at other employee gathering spots.

Conclusion

The overall positive agreement with most of the statements suggests there is a viable climate and culture for health, safety, and wellness.

Overall Results

APPENDIX 2 – DETAILED FINDINGS, RECOMMENDATIONS & MANAGEMENT ACTION PLANS

Audit Finding #1	**Risk Category:** Strategic	**Severity:** Medium

Management Leadership & Employee Participation

Strategy & Implementation Plan

What is happening?

The Ontario Occupational Health & Safety Act (OHSA) §25(2)(j) requires the employer to, among other duties, "prepare and review at least annually a written occupational health and safety policy and develop and maintain a program to implement that policy;".

The City has a current Health and Safety Policy Statement addressing physical and mental wellbeing and referencing employee and employer responsibility, and this policy is posted within all facilities for employees' reference.

Annual work plans for health, safety and wellness are drawn from accident trend analysis, Ministry of Labour regulations and inspections, identified risks, and current issues. Plans in the last two years have focused on the documentation of standards and safe job procedures related to areas of greater risk of injury.

A verbal description was provided as to the vision for health, safety and wellness in the City.

There is no overall long-term (3 to 5 year) strategy and implementation plan to describe:

- The City's current environment,
- The goals, objectives and principles for future state of health, safety and wellness within the City,
- How these goals and objectives align to corporate strategy,
- The level of risk the organization is willing to tolerate with respect to health, safety and wellness,
- The programs, resources, and timelines needed to accomplish the objectives, and
- Relevant leading and lagging performance measures.

What is the impact?

Without a strategy and the associated plan to implement, it is challenging to:

- Identify the priorities requiring the focus of the current limited resources for greatest impact,
- Make informed decisions in the development and on-going operations of health, safety & wellness programs;

- Confirm the alignment to corporate goals,
- Know the City is making progress on accomplishing what it has set out to do, and
- Make informed decisions on the required resources to accomplish the objectives.

Recommendations:
Conduct a facilitated strategy workshop involving stakeholders (i.e. JHSC representation, directors/managers, employees) to identify and formulate the key goals and objectives for health, safety and wellness in the City, considering broader strategic goals and legislative requirements. This discussion could start with strengths, weaknesses, opportunities, and threats to describe the current environment and support discussion of future state and the desired timeframe for achieving future state. Reference to the DuPont™ Bradley Curve™ may provide some guidance to defining the future state.

Management Action Plan – Audit Finding #1

Comments: Agree

Action Plan: We will conduct meetings involving the various stakeholders to identify and formulate vision and 3-5 year strategy for HS&W in the City, considering broader strategic goals and legislative requirements.

Responsibility: Health and Safety Coordinator

Target Date: Q4, 2019

Audit Finding #2	**Risk Category:** Process	**Severity:** Low

Management Leadership & Employee Participation

Documentation Publication

What is happening?
Information on the Health, Safety & Wellness web page includes a listing of safety standards created prior to 2017 and those created after 2017. The pre-2017 safety standards are also published on the P&R web page. The Health, Safety & Wellness web page also contains an orientation guide (dated 2013).

There is duplication of topics and varied level of detail in the pre-2017 and post-2017 standards, and the information in the orientation guide is out of date.

What is the impact?
The presence of links to same/related topics and the outdated orientation guide may cause confusion in locating and referencing the most current and relevant guidance.

Separate versions of documents on web pages may result in out of date information being available as source document changes may not be reflected in other versions.

Recommendations:

- Review the pre-2017 standards to the post-2017 standards to eliminate known duplication.
- Work with stakeholders to create links to the health, safety and wellness web page for master source information.
- Remove the orientation guide from the web page.

Management Action Plan – Audit Finding #2

Comments: Agree

Action Plan: We will remove pre-2017 Standards and the old orientation guide and coordinate with P&R to link to the HS&W intranet page for the most up-to-date source of information and Standards. A link to the HS&W intranet page will be created in the "HEALTH AND SAFETY" folder on the S: drive.

Responsibility: Health and Safety Coordinator

Target Date: Q2, 2019

Audit Finding #3	**Risk Category:** Safe Environment	**Severity:** Low

Management Leadership & Employee Participation

Joint Health & Safety Committee (JHSC) Functions

What is happening?
The OHSA §12 requires certification of at least one each of the employer and worker representatives. Of the 7 JHSC committees, the Tyandaga committee does not have the required certified member representing management.

What is the impact?
The Ministry of Labour (MOL) could issue an order to comply and set a specific timeframe for compliance.

Recommendations:
Send management representative for certification training or, as permitted under the OHSA §9(9), have a certified management representative from a different committee join the Tyandaga committee.

Management Action Plan – Audit Finding #3

Comments: Agree

Action Plan: Supervisor – Tyandaga Golf Course to become certified. In the interim, another certified management member will be assigned to this committee.

Responsibility: Supervisor of Tyandaga Golf Course

Target Date: Certification: Q3, 2019

Audit Finding #4	**Risk Category:** Performance & Responsibility	**Severity:** Medium

Management Leadership & Employee Participation

Training, Communication and Monitoring

What is happening?

Our Training Room (OTR) is the delivery system for training programs and communication of important corporate policies (e.g. code of conduct, respect in the workplace, etc.) and messages (e.g. communication related to corporate health and safety standards, etc.). New employees and new supervisors are automatically assigned the required awareness and Workplace Hazardous Materials Information System (WHMIS) training courses for completion through OTR. Communication of important corporate policies and messages are assigned to individuals through role groups.

Exception reports are generated (through OTR) to report incomplete events. These reports are sent to directors with the expectation the directors will forward the report to the appropriate people manager/supervisor for follow up with the employee.

Training

Ontario Regulation 297/13: Occupational Health and Safety Awareness and Training defines basic requirements for workers and supervisors to include awareness training, certification for JHSC, and working at heights (construction projects).

For 6 of the 48 employees' training records, at least one of the required awareness or WHMIS courses have not been competed. In one case, the supervisor awareness training was not assigned, and the employee has been a supervisor for at least 3 years. In 2 cases, the worker awareness training was assigned yet not completed, and the employees have worked for the City for over 3 years. In the remaining 3 cases, the WHMIS training was assigned yet not completed, and one employee is new to the City and the other 2 have been with the city for over 4 years.

Corporate Health & Safety Standards (CHSS) Communication

Within the sample of employees, the assigned review for communications of corporate health and safety standards is inconsistent. For example, 2 employees in the same position were not assigned the same communications for review.

Five of the 48 employees have not completed review of CHSS communications as assigned through OTR. There is no way to determine the date of the review assignment; therefore, there is no calculation of how long the incomplete is outstanding.

Monitoring

Close to 20% of the sampled employees had some form of incomplete event, be it training or review of CHSS. Through interviews, it is apparent there is a weakness in the monitoring process.

What is the impact?
Employees, especially new employees and new supervisors, may not be aware of their role and responsibilities (related to health and safety) and the accountability.

Increased liability for the City should incidents occur, and the City could not show compliance with basic training requirements or its own internal policies.

The Ministry of Labour (MOL) could find the City non-compliant with legislation and regulation and enforce accordingly.

Recommendations:
Re-confirm business rules for assigning training and CHSS communications through OTR.

Distribute exception reporting to people managers/supervisors first. Set a threshold for length of time incomplete (e.g. 3 months) for escalation to director of department and director of HR.

Re-affirm with employees and people managers their responsibility for completing training, reviewing communications, and monitoring and follow up of training, is a component of performing successfully in their role.

Management Action Plan – Audit Finding #4

Comments: Agree

Action Plan: Departments must ensure that their staff completes the required training and sign-offs. Monthly exception reports to now be sent to Managers through Our Training Room as well as the Directors (already occurring). In June 2019, Corporate Health and Safety Standards will be on the BLT agenda (re: implementation successes and challenges). H&S to further investigate legislated training deficiencies and notify management accordingly.

Responsibility: Health and Safety Coordinator

Target Date: Q2, 2019

Audit Finding #5	**Risk Category:** Process	**Severity:** Low

Job Hazard Analysis/Safe Job Procedures

What is happening?

A safe job procedure (SJP) is intended to document all hazards and controls associated with a task or process. By design, it is a training tool (as sign-off of review and understanding is required) and it can augment standard operating procedures in the safe use of equipment. Since early 2017, over 90 SJPs have been created and implemented, primarily in Roads, Parks & Forestry, Transit, Transportation-Signals, and Parks & Recreation-Facility Operations. The development of SJPs is a department responsibility, with assistance, if required, from Health and Safety Coordinator.

Refresher Review

The SJPs are equipment-specific with some equipment used on a seasonal basis. The initial publication/implementation of an SJP requires sign-off as to review and understanding. The CHSS for safe job procedures is silent on the requirements for subsequent "refresher" review.

Digital Storage

Given the departmental responsibility for SJPs, digital retention tends to occur within department folders/files. There is no centralized inventory of current SJPs.

What is the impact?

With the seasonal use of equipment, or the simple passage of time, staff may forget or get out of the habit of using equipment in the safest manner.

Development of SJPs in isolation may result in duplicate effort and/or inconsistent information.

Recommendations:

In consultation with stakeholders, determine if a refresher review is required, and if so, the guidelines to prompt the review.

Work with the SJP owners to determine a method for joint storage of SJPs.

Management Action Plan – Audit Finding #5

Comments: Agree

Action Plan: SJP refresher sign-off will be tabled at a BLT meeting in June as it will require support from management to implement. We can establish a dedicated location in the "HEALTH AND SAFETY" folder on the S: drive for SJPs by department. Caution should be exercised as equipment and processes may vary between departments, even if it appears to be similar.

Responsibility: Health and Safety Coordinator

Target Date: Q4, 2019

APPENDIX 3 – ADDITIONAL OBSERVATIONS

Observation #1
Our Training Room (OTR) is becoming the go-to method to support training needs including tracking and monitoring of training and certification requirements in specific areas. Duplication of records exist in those areas where manual records are still being maintained.

Recommendation:
As an organization, further discussions on the functional and practical use of OTR to determine effective use for communication, training, certification tracking, and sign-offs.

Observation #2
Digital copies of JHSC inspections and meeting minutes are not consistently maintained in a centralized location.

Recommendation:
Include a tag line in the inspection document to post on bulletin board and save scanned copy to shared drive. Provide guidance to all committees to use the Word template to document minutes and archive all Excel workbooks.

Observation #3
People managers tend to rely on OTR as the standard for training requirements when OTR is the delivery mechanism. People managers need to be aware of what training is required by employees regardless of the delivery mechanism. This need is why the use of training matrices is becoming popular. When training matrices are used, these matrices provide detail of all training and certification requirements dependent on position. The training matrix is the standard for training requirements and should be the reference point for confirming all training requirements have been met.

Recommendation:
A coordinated and collaborative approach to develop and implement training matrices, involving both the department/area and appropriate Human Resources staff, creates the opportunity for a comprehensive review of training requirements.

Observation #4
Staff could easily recognize the topics of the corporate health and safety standards when prompted (i.e. asked about working in hot weather, working at heights, etc.) yet staff could not readily respond when asked about “corporate health and safety standards”. This terminology is not widely recognized as compared to “standard operating procedure” and “safe job procedure.”

Recommendation:
Bring the Health, Safety & Wellness information out from the HR webpage and place it in the toolbox where it can stand among other corporate functions such as risk management, business performance, ITS Helpdesk, etc.

LEGENDS & INTERNAL AUDIT STANDARDS

Overall Audit Ratings	
Rating	**Description**
Excellent	• No internal control weaknesses noted. • Good adherence to laws, regulations, and policies. • Good control environment. • Operations are considered efficient and effective.
Good	• Several low and/or one or two medium findings. • Minor contraventions of policies and procedures with compensating controls in place. • No violation of laws. • Minor opportunities for improvement in efficiency and effectiveness.
Fair	• Many medium findings and/or one or two high findings. • Several contraventions to policy. • Minor violations of regulations/laws with minimal impact to City. • Moderate opportunities for improvement in efficiency and effectiveness.
Weak	• Several high findings and some medium and/or low findings • Controls weak in one or more areas. • Noncompliance with policies put the City at risk. • Violation of law/regulation put the City at risk. • Substantial opportunities for improvement. • Operations are considered consistently inefficient and/or ineffective

Audit Finding Severity Scale	
Severity	**Details**
High	• Residual risk is very high or high • Key control does not exist, is poorly designed or is not operating as intended • Serious non-compliance to policy or regulation • May result in immediate or material loss/misuse of assets, legal/regulatory action, material financial statement misstatements, etc. • Indicates a serious business control weakness/deficiency requiring immediate action
Medium	• Residual risk is medium • Key controls are partially in place and/or are operating only somewhat effectively • Some non-compliance to policy or regulation • May negatively affect the efficiency and effectiveness of operations and/or financial reporting accuracy. • Indicates a business control concern requiring near-term action be taken
Low	• Residual risk is low to very low • Key controls are in place, but procedures and/or operations could be enhanced. • Minor non-compliance to policy or regulation • May result in minor impact to operations. • Indicates a business control improvement opportunity for which longer-term action may be acceptable.

Audit Methodology

The audit was conducted in conformance with the International Standards for the Professional Practice of Internal Auditing. The City Auditor relied upon interviews with and observation of key personnel, examination of information, data, and other documentary evidence and re-testing of controls.

Audit Conclusions

The conclusions reached in this report are based upon information available at the time. The overall conclusion is only applicable to the function/area of this audit. It reflects the professional judgment of the Office of the City Auditor based on a comparison of situations as they existed at the time against audit criteria as identified in the scope of the audit.

Reasonable Assurance

This conclusion is intended to provide reasonable assurance regarding internal controls. There are inherent limitations in any controls, including the possibility of human error and the circumvention or overriding of controls. Accordingly, even effective controls may provide only reasonable assurance with respect to City operations.