Based on valuable member and provider feedback related to improving the topic selection and approval process in the Health and Safety Excellence program, we have outlined the following requirements for the selection of topics for 2021 action plans.

Members need to follow these guidelines for all action plans approved on or after February 19, 2021 in order to meet program requirements. Topics and/or action plans currently in progress are not impacted by this change.

Note: *HSEp Program Guide_Final V4 September 2020* will be updated to include these requirements.

Requirements for selecting 2021 action plan topics

The Health and Safety Excellence program offers 36 health and safety topics, over three levels, as building blocks from awareness to excellence in health and safety. Members select topics based on their maturity in health and safety and continue to advance through the program.

Topic selection

Topic selection involves objective and thoughtful consideration of which topics will most significantly improve workplace health and safety. WSIB's Compass tool, and other sources of information like inspection reports can help point to health and safety initiatives that will:

- reduce injuries and illnesses
- establish return to work processes
- improve workplace health and safety culture
- reduce risks associated with hazards

At the end of this document is a checklist of questions members should consider when thinking about selecting high impact topics.

Note: For topic selection guidance for employers with an accredited occupational health and safety management system (i.e. ISO 450001, COR 2020), please see the section 'accredited occupational health and safety management systems' in the member guidelines.

Categories for topic selection

There are five categories for topic selection for 2021 action plans. Specific topic descriptions are available in the Health and Safety Excellence program member guidelines. Members are to review topic descriptions to determine whether the topic selection meets one of the categories listed below.

Category 1: Selecting a topic that represents a health and safety initiative that is **new** to the business

Members select topics that represent **new** health and safety initiatives, such as a new

return to work program, or a new hazard recognition procedure. Although not mandatory, it is <u>strongly recommended</u> that the rationale for choosing a new topic is noted.

Members can use the following questions as a guideline:

1. Why are you selecting this topic?
2. How will the topic address hazards and/or make the workplace healthier and safer?
3. What meaningful outcomes do you expect to achieve by working on this topic?

Documenting the rationale for selecting the topic will help with both planning and implementation of topics. It will also provide a starting point which will help formulate theevidence story required at the demonstration step.

Example – new initiative	A business is new to health and safety and chooses the Leadership and Commitment topic because its requirements involve a new initiative for the business. There is no health and safety policy in place, and health and safety responsibilities have not been established for senior management. By addressing this topic, the business expects to establish roles and responsibilities, accountability of leadership, and lay the foundation for building an effective health and safety management system.

Category 2: <u>Significant gap in effectiveness</u> of a health and safety initiative:

Members can select a topic that is not new to their workplace if there is a significant gap in effectiveness of the existing health and safety initiative. An example of a significant gap would be a hazard is not being controlled or a risk has not been minimized.

Members must provide a rationale for choosing a topic that fits in category 2 by answering these questions:

1. What is the category for this topic selection (e.g. significant gap in effectiveness)
2. Why are you selecting this topic?
   - Members must be able to explain (using qualitative or quantitative data) and demonstrate why the existing initiative is not working by including evidence of the gap in effectiveness and its significance.
3. How will the topic address hazards and/or make the workplace healthier and safer?
4. What meaningful outcomes do you expect to achieve by working on this topic?
   - Members should include what the impact would be if they were not approved to work on the topic.

Example – gap in effectiveness	**Issue/gap**: A long term care home currently has a workplace violence and harassment prevention program in place that meets legislative requirements. However, upon review of injury trends in WSIB's Compass tool, assaults, violent acts and harassment are identified as primary causes of injury. **Evidence of issue/gap**: Compass data shows >50 % of all lost time injuries and the main cause is patient assaults on nurses. Given the high rate of injuries around violent acts, the employer identifies that the current program is not effectively mitigating the risk of injury to nurses from patients. **Topic selected to address issue/gap**: For this reason, the member selects the Control of Hazards – Workplace Violence topic to address the gap in current program effectiveness by identifying the causes of the hazard and working through the hierarchy of controls to implement strategies to mitigate the risk of injury. **Expected improvements:** By working on this topic, the business has the opportunity to develop and implement controls that could reduce the rate of injury. If this topic is not chosen, nurses will continue to be at high risk for assaults.

Category 3: Significant <u>change in the workplace</u>

Members can select a topic that is not new to their workplace if **a significant change has occurred in their workplace**, and as a result of the significant change, hazards/risks are no longer being controlled and the workplace is at risk for not being healthy and safe.

Members must provide the rationale for choosing a topic that fits in category 3 by answeringthese questions:

1. What is the category for this topic selection (e.g. significant change in the workplace)
2. Why are you selecting this topic?
    a. The significant change to the workplace must be clearly explained.
3. How will the topic address hazards and/or make the workplace healthier and safer?
4. What meaningful outcomes do you expect to achieve by working on this topic?

There are two scenarios under this category:

Scenario 1: Selecting a topic based on a health and safety initiative previously implemented (for example through Safety Groups) that is no longer relevant due to a significant change in the workplace.

Scenario 2: Repeating a topic previously implemented in the Health and Safety Excellence program that is no longer relevant due to a significant change in the workplace.

| Example –
significant
change in
the
workplace	A drywall contractor has decided to take on work as a general contractor, which changes their business model and significantly increases their level of accountability on a construction project. They have not established or implemented a procedure to define health and safety responsibilities for allparties with respect to this new business function. They choose to work onthe Health and Safety Responsibilities topic because a number of changesmust be made to the existing health and safety management system. Because the risks associated with general contractor responsibilities are not being controlled. Constructor responsibilities must be incorporated intotheir management system along with additional responsibilities for other workplace parties to ensure legislative compliance and the mitigation of risks associated with taking on the role of a general contractor.

Category 4: **Repeating the 'Control of Hazards'** topic

The Health and Safety Excellence program topic **Control of Hazards** – can be repeated to address **new** hazards not previously addressed through previous topic completion.

| Example –
repeating
Control of
Hazards topic	A business has decided to work on the Control of Hazards topic to address controlling the spread of COVID-19, a new hazard, by implementing engineering controls, administrative controls, safe work practices such as hygiene and sanitation, and personal protective equipment needed to address the hazard in their workplace.

Although not mandatory, it is strongly recommended that the rationale for repeating the Control of Hazards topic to address a new hazard in the workplace is noted. Members can use the following questions as a guideline:

- Why are you selecting this topic?
- How will the topic address hazards and/or make the workplace healthier and safer?
- What meaningful outcomes do you expect to achieve by working on this topic?

Documenting the rationale for selecting the topic will help with both planning and implementation of topics. It will also provide a starting point which will help formulate the evidence story required at the demonstration step.

Category 5: Selecting a program topic identified as <u>incomplete or deferred by the business:</u>

Members have the option to re-select a health and safety topic with a final topic status of 'incomplete' or 'deferred' from a previous action plan. Please note that the topic must still meet one of the other eligibility categories including any rationale requirements.

<u>Ineligibility for topic selection – continuous improvement</u>

Continuous improvement is an ongoing effort to review and improve a policy, procedure, or process that has been fully implemented to ensure health and safety hazards continue to be controlled, such as making improvements to a workplace inspection procedure. Although important to assess existing health and safety initiatives, continuous improvement activities do not meet program requirements and are not eligible for topic selection or a rebate.

Example – continuous improvement	A large manufacturer of circuit boards conducts an annual review of their corporate health and safety policy by engaging employees such as the Joint Occupational Health and Safety Committee, union representatives, supervisorsand front line staff to obtain feedback. Opportunities are identified to update thepolicy to make it clearer, but there is no significant change. The policy is updated, signed and dated by senior management.

Note: Once selected, members will implement topics according to the requirements in the health and safety topic descriptions. Once implemented, evidence for validation should be submitted according to the evidence requirements.

Additional Guidance: A checklist of questions to help members choose meaningful topics

Consider using these questions to help guide members in their topic selection:

- ✓ What are your risks? Have you completed a risk assessment?
- ✓ Do you have a process to complete a risk assessment?
- ✓ Have you looked at which hazards have uncontrolled risks?
- ✓ Do you know what key hazards are leading to injuries and illnesses?
- ✓ Have you completed the culture survey and are there any differences in perception between employee groups that would suggest a gap? (e.g. between leadership and front-line)
- ✓ Looking through the list and description of topics, are any topics non- existent in your business e.g. foundational elements you did not realize you need to have in place?
- ✓ What parts of your health and safety program or management system are truly broken?

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- ✓ Have you received any compliance assistance and/or compliance orders from the Ministry of Labour, Training and Skills Development that link to a topic?
- ✓ Have you asked your employees, joint health and safety committee or health and safety representative, "What hazards and processes do you think we need to address immediately?"
- ✓ Is there new legislation, regulation or codes that will significantly impact your business and for which you are not prepared or having no processes in place to support?
- ✓ Are there any changes to your workplace, equipment, or workplace that introduced a new hazard?
- ✓ Have you reviewed:
    - o Inspection reports, repeat issues
    - o Incident investigations
    - o Return-to-work forms
    - o WSIB employer reports of injury
    - o Your business's health and safety information on Compass
    - o Joint health and safety committee minutes and its recommendations
    - o Reoccurring health and safety issues
    - o Hazard reporting forms
    - o Maintenance records
    - o MLTSD orders
    - o Work refusals

Note: For topic selection guidance with an accredited occupational health and safety management system in place (i.e. ISO 450001, COR 2020), please see accredited occupational health and safety management systems.