



A Guideline to Building a Strong Internal Responsibility System

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Workplace Safety North would like to thank the Ontario Mining Association, the Institute for Work and Health, the IRS working group, and the IRS Climate Assessment and Audit Tool participants for their dedication in making this pilot project a success.

INTRODUCTION

The Internal Responsibility System Climate Assessment and Audit Tool is a way to measure workplace health and safety systems and culture: the health and safety ecosystem. The tool has been piloted in Ontario to provide mining operations with a snapshot of how their Internal Responsibility System (IRS) is working within their unique systemic and cultural ecosystem.

OVERVIEW AND BACKGROUND

The Ontario mining industry is the birthplace of the Internal Responsibility System (IRS). In 1976, the Ham Commission introduced the principle of the 'Internal Responsibility System' as a framework to identify and prevent occupational health and safety hazards.

Following the work of the Ham Commission, the province of Ontario included principles of the Internal Responsibility System in the Occupational Health and Safety Act (OHSA). In the OHSA, the IRS framework outlines employer duties, worker rights and duties, the joint health and safety committee (JHSC), health and safety representative rights and roles. Health and safety association assistance, and the Ministry of Labour's enforcement responsibilities also play a role in the IRS.

As part of the work of the 2015 Mining Health, Safety and Prevention Review an Internal Responsibility System (IRS) Working Group developed a set of best practices that support and nurture an effective IRS.

The best practice guideline created by the working group referenced the Mining Health, Safety and Prevention Review consultation in 2014, academic publications, interviews with subject matter experts, and government documents. The IRS CAAT used these best practice guidelines as the foundation of the measurement tool. Many of the best practices identified in the guideline are shown to prevent work-related injury and illness.



Other best practices are recommended as having promising potential to prevent work-related injury and illness (The Institute for Work and Health, 2015).

This document summarizes the findings of the work of the Institute for Work and Health during the analysis stage of the Internal Responsibility System Climate Assessment and Audit Tool (IRS CAAT) pilot, and identifies those best practices that are the most predictive of health and safety outcomes. The core practices that have the greatest impact on incident prevention outcomes are identified in this document and are referred to as Health and Safety Factors.

THE IRS CLIMATE ASSESSMENT AND AUDIT TOOL

The IRS CAAT pilot process involved an examination of an organization's occupational health and safety management system (OHSMS) and health and safety culture as they pertain to the IRS best practice statements.

These two areas represent the organization's systematic approach to fulfilling the best practices as well as perception around commitment to and sustainability of the demonstration of these best practices. Together, they form a comprehensive snapshot of what is expected to occur and how those expectations get interpreted and translated into action or inaction. Workplace Safety North (WSN) refers to the interaction of these two elements (system and culture) as the health and safety 'ecosystem.'

WSN carried out the IRS CAAT pilot from September 2015 until December 2016. A total of six Ontario mine sites volunteered to take part in the pilot (5 pilots have been completed to date).



More than **2000 people** took part in the pilot to date in Ontario

UNDERSTANDING THE TERMINOLOGY

Dimension:

A dimension is a component of the organization's health and safety culture. When we measure a dimension by examining perceptions, attitudes and beliefs, we take a snapshot of the current state of the culture. This snapshot is referred to as the health and safety climate.

System Element:

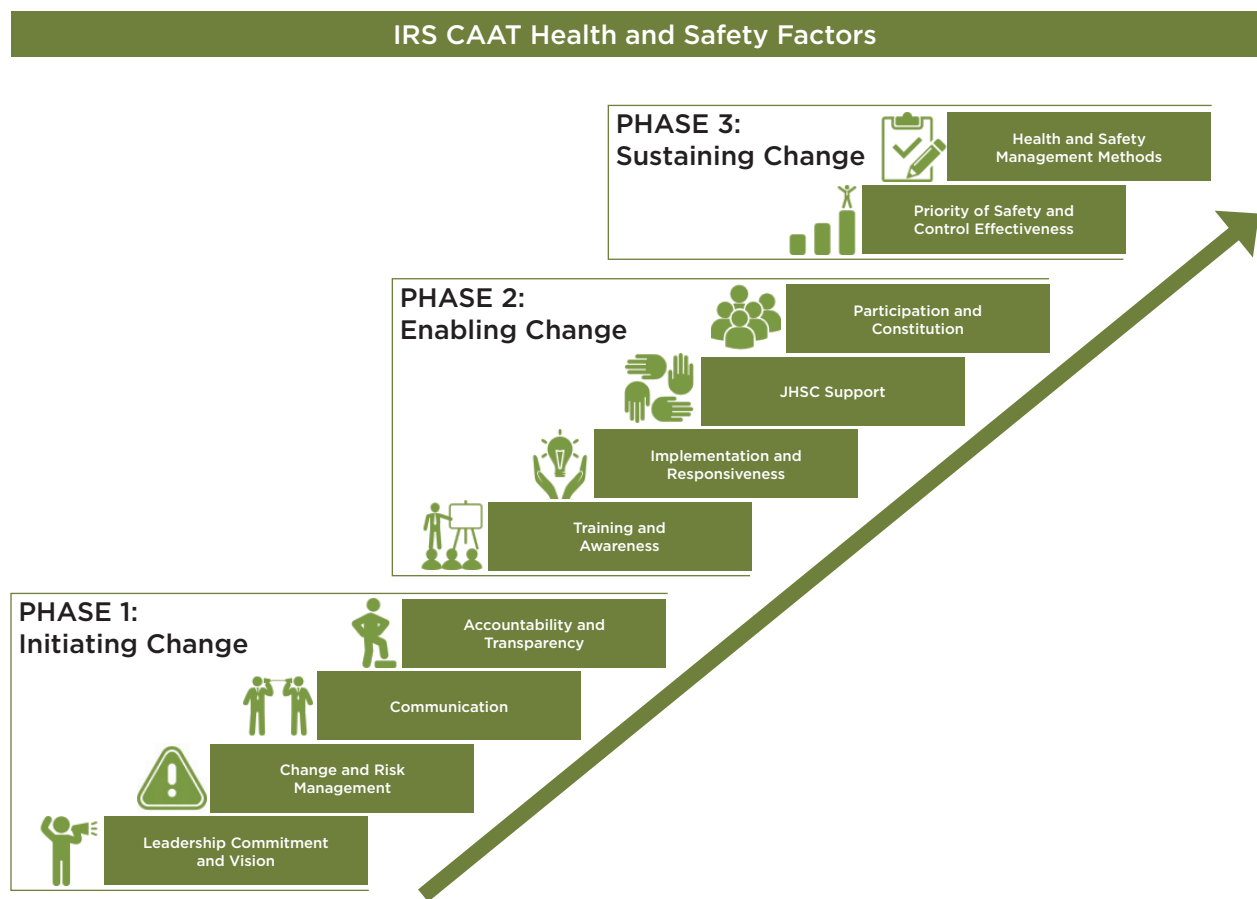
A system element is one component of an occupational health and safety management system. An OHSMS is made up of numerous system elements and each element summarizes common themes, which produces a cluster of components addressing the same area of interest.

Health and Safety Factor:

A health and safety factor is the culmination of the culture dimension and the system element as they relate to one another: both sides of the coin. This represents the factors that impact the health and safety ecosystem. We examine what expectations the system sets out versus what is actually going on in reality, and if there are discrepancies between the two. Each factor is made up of 50 percent culture and 50 percent system.

Phases and Stages of Change:

Based on the work that has been completed, WSN has created a roadmap to help organizations focus on a building block approach. These are simply recommendations on what to tackle first. The chart below outlines the three main phases of change and outlines each stage relative to the health and safety factors (including each culture and system component).



CORE HEALTH AND SAFETY FACTORS

This framework depicts the ways an organization can develop a strong International Responsibility System and build a positive health and safety ecosystem. This framework focuses on 8 of 10 dimensions measured by the IRS CAAT.







1. Leadership Commitment and Visibility

Original Best Practice Statement	Evidence of Best Practice in occupational health and safety management system (OHSMS)	Evidence of Best Practice through culture outcome
<p>Leadership demonstrates visible, personal participation in monitoring operational health and safety processes and conditions.</p> <p>A commitment on the part of the mining operation to ensure that occupational health and safety concerns received from workers and worker representatives are considered and effectively responded to in a timely manner.</p>	<p>Leadership monitoring of health and safety is an element in the OHSMS.</p> <p>There are systemic requirements that drive the action of all levels of leadership to personally monitor health and safety processes and conditions.</p> <p>There are checks and balances in place to ensure these are completed as intended and people are held accountable.</p> <p>Progress is measured and information gathered is used to review health and safety strategies and performance. In the spirit of continuous improvement, adjustments are made to processes, procedures, etc. based on findings of the observations.</p> <p>Concerns are addressed in a timely manner through the implementation of an effective hazard reporting and management system.</p> <p>A strong management system exists to identify concerns and appropriate priority is assigned to manage them.</p>	<p>Through involvement, leadership gains credibility and has their finger on the pulse and knows what is going on at the front line.</p> <p>Through open conversations based on learning and improvement with all levels, mutual trust is solidified and a culture of reporting exists.</p> <p>Workers are comfortable raising health and safety concerns and feel they can openly engage in resolution of issues.</p> <p>Making the time to genuinely demonstrate commitment reinforces the message that health and safety is not only a priority, but a value.</p> <p>By ensuring hazards and concerns are addressed in a timely manner, leadership demonstrates that health and safety is essential to the success of the operation. Trust is strengthened by fostering a culture of reporting.</p>

CORE HEALTH AND SAFETY FACTORS

Original Best Practice Statement	Evidence of Best Practice in occupational health and safety management system (OHSMS)	Evidence of Best Practice through culture outcome
	<p>Risk mitigation is based on outcome potential. Hazards identified through proactive hazard reports and near-miss reports are treated with the same level of attention and resources, as incident investigations and all hazards are addressed accordingly.</p> <p>Communication is a key component to this element as stakeholders (including those who raised the issue) are notified of the receipt of the concern and are kept up to date on the status of resolution including the action plan to resolve the issue, encouraged to participate in addressing the hazard, resolution of the issue and follow up to ensure the resolution is appropriate and adequate.</p>	<p>When concerns are raised and are perceived to have not been addressed, the organizations leadership begins to lose credibility and mutual trust declines. The inadvertent message that safety is not important will start to form the basis for perception and a culture of reporting disappears as a culture of discretion may begin to develop.</p> <p>The priority of safety is demonstrated by taking action before something happens and consistently acting upon leading indicators like near-miss and hazard reports.</p>

Phase	Stage	Health and Safety Factor	Climate Dimension	System Element	
Phase 1: Initiating Change	1		Leadership Commitment and Vision	Leadership Commitment and Visibility	Objectives and Management Review
			Change and Risk Management	Risk Appreciation	Planning for Hazard Identification, Risk Assessment and Control
	2		Communication	Communication	Communication
			Accountability and Transparency	Mutual Trust	Roles and Responsibilities





CORE HEALTH AND SAFETY FACTORS



2. Communication

Original Best Practice Statement	Evidence of Best Practice in occupational health and safety management system (OHSMS)	Evidence of Best Practice through culture outcome
<p>Senior management communicates frequently to supervisors, workers, worker representatives and the Joint Health and Safety Committee on the status of occupational health and safety control activities, including actions to address unresolved health and safety hazards.</p> <p>Applying the ‘hierarchy of controls’ principle in the implementation of improvements to hazard control activities.</p> <p>Senior management uses documented processes to provide timely and detailed information on the status of occupational health and safety control activities to the Joint Health and Safety Committee and worker representatives. Status reports would include (but not be limited to): the results of workplace inspections, reports of close-call incidents, the results of exposure assessments, site-based leading indicators, reports of work-related injury and illness incidents and disability management program results.</p>	<p>Risk assessment is an important part of an effective OHSMS however, hazard controls are essential to ensuring the health and safety of workers. Control effectiveness assurance programs exist and focus on ensuring controls are enabled, in place, and functioning up to a set standard.</p> <p>Hazards are identified, risks are assessed and control activities are highlighted as the first part of the process. The second part ensures the review of control activities related to high-risk hazards and a system framework is created around controls to manage the implementation and assurance aspect of the process. Critical and high-risk hazards are most effectively managed through this process with the focus on the control.</p> <p>The system ensures communication channels are established and functioning. Details around communication have been predetermined and there is a systematic flow of information once the process is initiated. By ensuring the proper stakeholders have been identified, communication is transparent, frequent and two-way.</p>	<p>As controls are managed proactively, the outcome is injury and loss reduction. As we shift our attention from assessing risk to managing controls, we start to see true continuous improvement. Workers start to gain a better understanding of risk management by focusing on controls and we start to shift the focus of our system to this cause.</p> <p>Rules and systems start to become more relevant and effective as they highlight prevention efforts through control management. This helps build up the credibility of leadership and impacts risk appreciation.</p> <p>When a hazard is reported and not addressed (or perceived to not have been addressed), the perception is ‘safety doesn’t matter’ or ‘what’s the point of reporting something, it won’t get addressed anyway.’ Sometimes, the hazard was addressed, but the communication was absent. In these circumstances, perception is still affected.</p> <p>Most of the time, simply keeping people up to date on what’s going on helps keep perceptions positive and workers feeling involved and informed.</p>

CORE HEALTH AND SAFETY FACTORS

Phase	Stage	Health and Safety Factor	Climate Dimension	System Element
Phase 1: Initiating Change	1	 Leadership Commitment and Vision	Leadership Commitment and Visibility	Objectives and Management Review
		 Change and Risk Management	Risk Appreciation	Planning for Hazard Identification, Risk Assessment and Control
	2	 Communication	Communication	Communication
		 Accountability and Transparency	Mutual Trust	Roles and Responsibilities



3. Mutual Trust

Original Best Practice Statement	Evidence of Best Practice in occupational health and safety management system (OHSMS)	Evidence of Best Practice through culture outcome
A clear and fundamental commitment to discipline supervisors and managers who discipline or threaten to discipline a worker for exercising their rights under the Occupational Health and Safety Act.	<p>Ensuring workers feel confident in exercising their right to refuse unsafe work without fear of reprisal is essential. We are to ensure the health and safety of all even when the IRS fails.</p> <p>The system ensures the right to raise a health and safety concern without the fear of reprisal; is protected and contains a stance and process outlining the consequences should reprisal take place. There is a mechanism in place for reporting these instances, and assurance that consequences are documented (including escalation to the relevant labour enforcement authority).</p>	<p>A sense of security is present when workers are aware that they are held accountable to a standard of care, and that there are mechanisms in place to ensure accountability at all levels.</p> <p>The IRS continues to gain momentum as a clear message is sent in regard to the commitment to workers' safety and protection of rights.</p>

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Phase 1: Initiating Change	1	Leadership Commitment and Vision	Leadership Commitment and Visibility	Objectives and Management Review
		Change and Risk Management	Risk Appreciation	Planning for Hazard Identification, Risk Assessment and Control
	2	Communication	Communication	Communication
		Accountability and Transparency *	Mutual Trust	Roles and Responsibilities

* Additional IRS CAAT Health and Safety Factor

CORE HEALTH AND SAFETY FACTORS



4. Training and Competency

Original Best Practice Statement	Evidence of Best Practice in occupational health and safety management system (OHSMS)	Evidence of Best Practice through culture outcome
Ensure workers receive training in the requirements of the organization's OHS programs and procedures, and all training as required by legislation and regulation; that all workers and all levels of management understand their roles and responsibilities under the occupational health and safety programs and procedures; and that all workers and all levels of management are aware of their rights and responsibilities under the Occupational Health and Safety Act.	By focusing on foundational pieces of the IRS, the system ensures the employer has provided individuals with the knowledge regarding their rights and responsibilities under the Occupational Health and Safety Act. Staff is trained and understands their respective roles in the work refusal process. They are aware that they have the right to know what they are working with, how it can harm them, and how to protect themselves.	There is a clear understanding of expectations and how each individual's set of duties interlocks with the others. When stakeholders understand these foundational pieces, others are able to fulfill their roles more effectively.
The recognition that workers may also report concerns about health and safety hazards to their Joint Health and Safety Committee representatives or worker representatives.	The system provides a framework and process for reporting hazards and this framework includes the ability for a worker to report hazards to the JHSC/rep.	The highlighting of the JHSC/rep in the reporting element helps increase the level of confidence in the risk management process. By ensuring there are multiple reporting points, a worker is never stuck in a situation of having only one means to an end. This also helps ensure the IRS is functioning as enables various roles to keep others in check indirectly.

Phase	Stage	Health and Safety Factor	Climate Dimension	System Element
Phase 2: Enabling Change	3	Training and Awareness	Training and Competency	Training, Awareness and Competence
	4	Implementation and Responsiveness	Responsiveness and Resources	Implementation, Operation and Resources
	5	JHSC Support	JHSC Support	JHSC/Rep Participation and Consultation
	6	Participation and Consultation	Involvement and Empowerment	Employee Participation and Consultation

CORE HEALTH AND SAFETY FACTORS



5. Responsiveness and Resources

Original Best Practice Statement	Evidence of Best Practice in occupational health and safety management system (OHSMS)	Evidence of Best Practice through culture outcome
<p>Provide workers, JHSC and worker representatives with the time required and adequate resources to participate effectively in the planning, implementation and revision of occupational health and safety programs and procedures.</p> <p>Provide appropriate financial, human, and organizational resources for planning, implementing, reviewing, and improving occupational health and safety programs and procedures.</p>	<p>The system ensures a means for assessing the time and resource needs of the JHSC-worker rep to effectively perform their duties. There is also a planning and resourcing component in the system.</p> <p>Outcomes should be identified and resources for achievement should be apparent and adequate.</p>	<p>The perception around support for the JHSC-worker rep is affected in a positive manner as we see commitment in the form of time, resources, financial support etc. These actions send a clear message that the JHSC-worker rep will be treated as a health and safety partner and set up for success through leadership support.</p>

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CORE HEALTH AND SAFETY FACTORS



6. JHSC Support

Original Best Practice Statement	Evidence of Best Practice in occupational health and safety management system (OHSMS)	Evidence of Best Practice through culture outcome
<p>Support opportunities for the Joint Health and Safety Committee and worker representatives to independently communicate to workers on occupational health and safety matters.</p> <p>Organizational commitment to support the role of the Joint Health and Safety Committee(s) and worker representatives and to promote the integrity of the processes of the Joint Health and Safety Committee(s).</p> <p>Involve workers and worker representatives in inspections, investigations, and consultations conducted by the organization or the Ministry of Labour.</p> <p>Involve workers and worker representatives in third-party audits of the organization's occupational health and safety programs and procedures.</p>	<p>The system identifies the roles of the JHSC and outlines its responsibilities, accountabilities, purpose and how the organization will provide support.</p> <p>The system also enables a policy and process that reflects the commitment to support the JHSC-worker representatives, which also identifies:</p> <ul style="list-style-type: none"> • Strategies to ensure opportunities for the Joint Health and Safety and worker representatives to independently communicate to workers on occupational health and safety matters such as discussion opportunities during inspections and field visits or JHSC/rep meet and greet opportunities etc. • Supports the integrity of the process by enabling the JHSC/rep to fulfill their role and encouraging participation in inspections, meetings etc. as well as encouraging workers to take part in voting for their worker representatives and taking suggestions for management representatives. <p>Demonstrate partnership between the employer and the JHSC through an established process for involvement during Ministry of Labour inspections, investigations, audits, procedure and training review, etc.</p>	<p>The perception around support for the JHSC-worker rep is affected in a positive manner as we see commitment in the form of time, resources, financial support etc. These actions send a clear message that the JHSC-worker rep will be treated as a health and safety partner and set up for success through leadership support.</p>

CORE HEALTH AND SAFETY FACTORS

Phase	Stage	Health and Safety Factor	Climate Dimension	System Element
Phase 2: Enabling Change	3	 Training and Awareness	Training and Competency	Training, Awareness and Competence
	4	 Implementation and Responsiveness	Responsiveness and Resources	Implementation, Operation and Resources
	5	 JHSC Support	JHSC Support	JHSC/Rep Participation and Consultation
	6	 Participation and Consultation	Involvement and Empowerment	Employee Participation and Consultation

CORE HEALTH AND SAFETY FACTORS



7. Involvement and Empowerment





Original Best Practice Statement	Evidence of Best Practice in occupational health and safety management system (OHSMS)	Evidence of Best Practice through culture outcome
<p>Workers report health and safety hazards to their supervisors, as per the requirements of the Occupational Health and Safety Act, and work with supervisors to take actions to address the hazard.</p> <p>Provide training to all worker and employer Joint Health and Safety Committee representatives to enhance skills in worksite inspection, hazard identification and control, incident investigations, audits, job hazard analysis and emergency planning and response.</p>	<p>In addition to laying the groundwork for a strong reporting culture, the system enhances each stakeholder’s accountability to health and safety by ensuring involvement in resolution of the issue. This is process driven and is not a ‘handoff’ outcome but resembles adding members to a team.</p> <p>All those with accountability in the chain of interlocking duties possess consistent knowledge and understanding due to systematic training requirements based on risk management and relevant training founded on a health and safety training needs analysis.</p> <p>JHSC-worker representatives can be a resource utilized by the system to help facilitate this process as they can check on the progress of hazard resolution including the inclusiveness of the process. The continuous improvement process can also capture these measurables.</p>	<p>Ownership is an obvious strength in a mature IRS. By enabling all individuals to appropriately and effectively manage risk, by being part of a resolution team, or by empowering them to address a hazard, health and safety is integrated into everyone’s role. This is the core of the IRS and is now put into practice.</p> <p>A systemic approach helps to get everyone on the same page so we can have meaningful discussions and develop effective controls. Risk management training is not reserved for a select few; all individuals possess the skill set to maximize understanding, communication and prevention outcomes.</p> <p>Mutual trust, risk, and change management begin to improve as individuals feel they are trusted and capable to do their jobs in its entirety. They do not treat health and safety as an ‘extra’, because the organization does not structure it this way. By affording the same knowledge consistently to all levels, we unify the operations approach to health and safety.</p>

CORE HEALTH AND SAFETY FACTORS

Original Best Practice Statement	Evidence of Best Practice in occupational health and safety management system (OHSMS)	Evidence of Best Practice through culture outcome
<p>Consult workers, Joint Health and Safety Committee members and worker representatives when there are anticipated changes to facilities, processes, operations, new machinery, equipment, tools, work procedures, workforce organization or staffing levels which may alter health and safety hazards.</p>	<p>A strong management of change and risk management process is crucial to mitigating the potential of loss. A system component ensures a solid process is essential to success. In addition, the involvement of relevant stakeholders makes up a part the process, with the intent of using the best information possible to make further decisions.</p>	<p>Through involvement, stakeholders are aware of change and risk, and have an opportunity to shape the outcome. There is no more effective way of disseminating information and gathering collective feedback then by the inclusion of all levels in the planning phase. The more input we can get, the better the outcome as there is a far greater understanding from a group than one individual.</p> <p>Less resistance and confusion in roll out stages is apparent, as people are already aware of the change and understand the aspects around the why, how and what due to their involvement.</p>
<p>Define roles, assign responsibilities, establish accountability, and delegate authority to implement the occupational health and safety programs and procedures.</p>	<p>The system establishes the structure that enables the defining of roles, assigning responsibilities, establishing accountability and delegation of authority as it relates to the operations health and safety program. Processes are mapped out while stakeholders are identified and their accountabilities are defined with respect to intended outcome. Responsibilities are then created to ensure alignment between intended outcomes and actual outcomes by enabling each level of stakeholder to fulfill their responsibilities.</p>	<p>A clear sense of purpose prevails with no confusion, and results are planned and deliberate. Expectations are clear and mechanisms to enable the IRS are defined and utilized appropriately.</p>

CORE HEALTH AND SAFETY FACTORS

Original Best Practice Statement	Evidence of Best Practice in occupational health and safety management system (OHSMS)	Evidence of Best Practice through culture outcome
Enable the participation of workers in joint decision-making concerning the identification and control of health and safety hazards without fear of reprisal.	A commitment to this concept can be observed through a process similar to ‘whistle blowing’. This system piece acts as a contingency should the IRS fail culturally. This contingency plan is an unbiased process that is typically managed at an arm’s length and is a buffer for those who may potentially fall victim to reprisal. This element ensures a sense of fairness by allowing for a contingency should the expectation of being free from the fear of reprisal fail. It includes a process to ensure the workers’ rights are protected.	Although a workplace free from the fear of reprisal is the optimal state, this is not always the case. However, we can ensure that there is a safety net should the system fail. This helps to establish assurance that alternatives are available to the worker.

Phase	Stage	Health and Safety Factor	Climate Dimension	System Element
Phase 2: Enabling Change	3	 Training and Awareness	Training and Competency	Training, Awareness and Competence
	4	 Implementation and Responsiveness	Responsiveness and Resources	Implementation, Operation and Resources
	5	 JHSC Support	JHSC Support	JHSC/Rep Participation and Consultation
	6	 Participation and Consultation	Involvement and Empowerment	Employee Participation and Consultation

CORE HEALTH AND SAFETY FACTORS



8. Rules and Systems

Original Best Practice Statement	Evidence of Best Practice in occupational health and safety management system (OHSMS)	Evidence of Best Practice through culture outcome
<p>Ensure rules and procedures are established and expectations are set with the intent of generating consistent outcomes (zero harm).</p> <p>Ensure consequences for not following the rules are consistently applied to all.</p>	<p>The system ensures clear and relevant rules and procedures. These are communicated and have been established by gathering input from relevant stakeholders.</p> <p>A standard process exists (and is applied) for dealing with deviation from rules and procedures, and takes into account standard information like training received, experience, history, risk, and nature of deviation. From here, consistency is key in ensuring a 'just' culture. A clear process that is communicated to all is essential to removing the stigma of 'favourites' when it comes to health and safety enforcement. The system elements should examine the system contributors and enablers of the individual's action, and not the action (or inaction) on its own. The relevance and accuracy of the procedure and rule must also be examined as it may not be accurate.</p>	<p>Procedures and rules must be clear and relevant (accurately reflect what is going on) otherwise they will not be followed and the entire system (including leadership) loses credibility and support. There is a period of learning that must also be accounted for when implementing something new as we need to ensure it generates the intended outcome. We want to know if there is a flaw in the process once in practice; a culture of learning will ensure an opportunity for open feedback allowing for refinement based on the best information possible thus increasing effectiveness.</p> <p>If it is perceived that there is inequality when it comes to the application of consequences for not following safety rules and procedures, mutual trust will deteriorate quickly. Credibility can be maintained by ensuring a transparent process is in place for all levels and that all are held accountable to it.</p>

Phase	Stage	Health and Safety Factor	Climate Dimension	System Element
Phase 3: Sustaining Change	7	<p>Priority of Safety and Control Effectiveness *</p>	Safety as a Value	Operational Control & Preventative Action
	8	<p>Health and Safety Management Methods</p>	Rules and Systems	Documentation

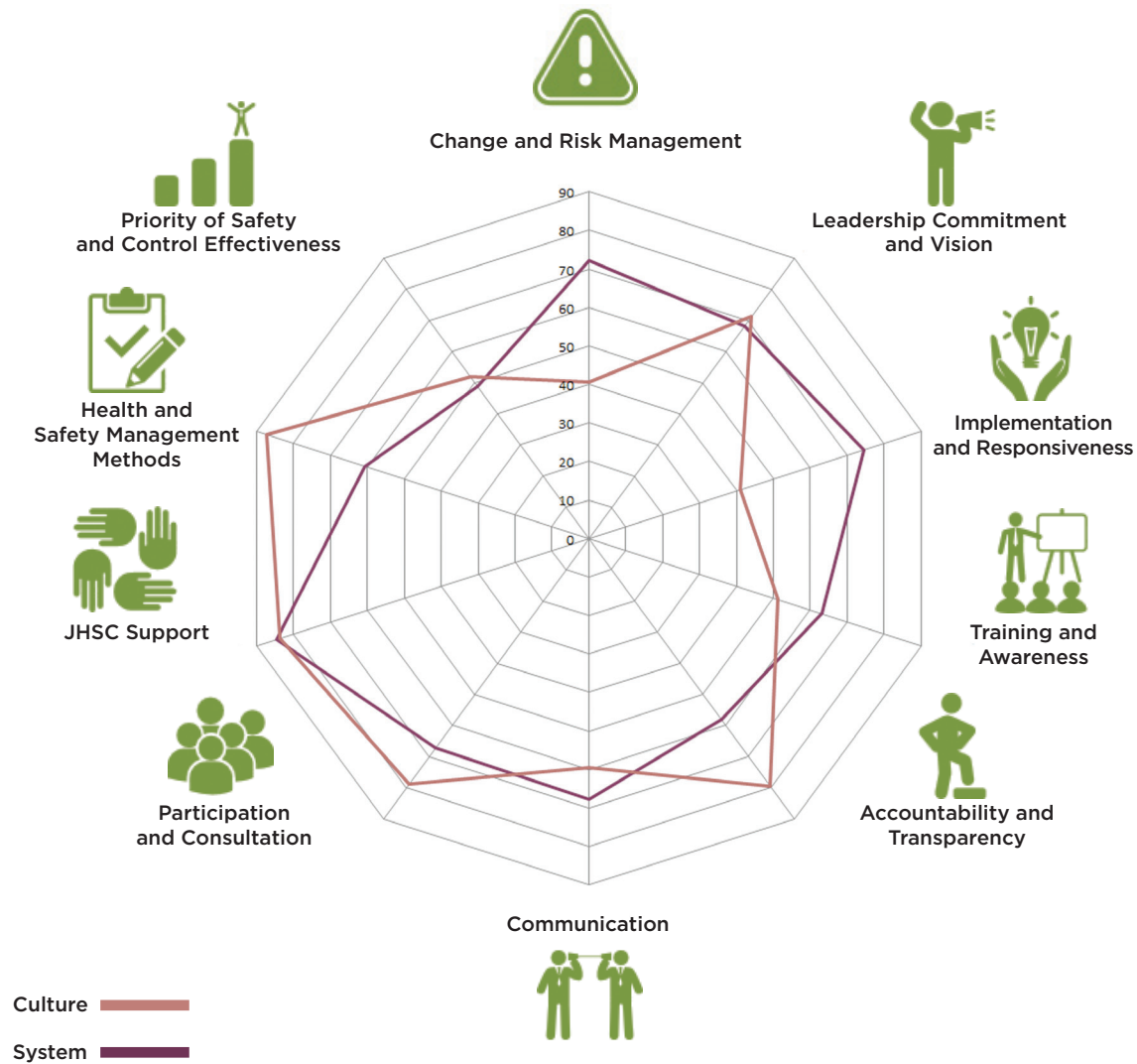
* Additional IRS CAAT Health and Safety Factor

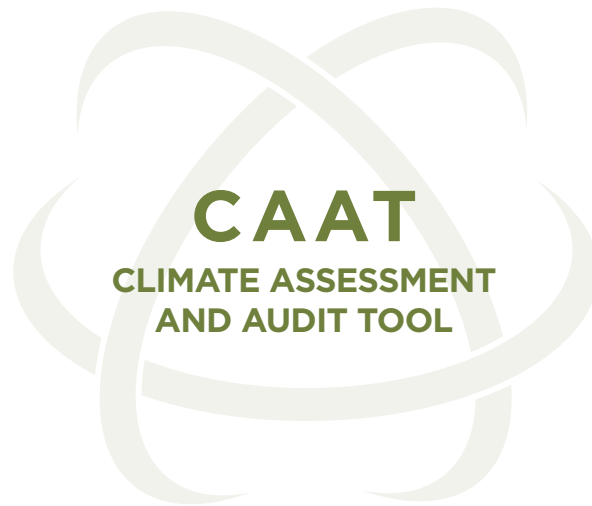
HEALTH AND SAFETY FACTORS: ALIGNMENT BETWEEN CULTURE AND SYSTEMS

The Climate Assessment and Audit Tool identifies areas of disconnect and alignment in both culture and systems. By identifying current perceptions held within a workforce – how people behave, and how they think and feel about health and safety issues, we can begin to identify themes around potential future action or inaction. This allows for adjustments to be made before an incident occurs.

By examining the system component we gain a deeper understanding of what expectations have been set and what elements are supported by a strong process versus what elements may be falling short when it comes to effectiveness and impact. Many organizations go through the motions of establishing a system without truly examining the effectiveness of control the system provides. Systems can provide a false sense of security if we don't take a step back and take a look through a different lens from time to time.

Through the use of IRS CAAT, we obtain a 360 degree view and measurement of these contributing factors and we have the opportunity to see a much clearer picture. This allows for adjustments to be made before an incident occurs.





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YOUR HEALTH AND SAFETY PARTNER

An independent not-for-profit organization, Workplace Safety North (WSN) is a leading provider of health and safety services, training, and resources for mining, mine rescue, forestry, paper, printing and converting sectors, as well as northern Ontario businesses across all sectors. As one of the four designated health and safety associations in Ontario, businesses call upon WSN for expert advice and information, classroom and online training programs, on-site consultations, health and safety audits, industrial hygiene testing, ergonomic assessments, and specific problem-solving.

