Guideline for Developing a Health and Safety Program Element
© Workplace Safety North, 2011

Occupational Health and Safety Act & Regulations

The information contained in this material is provided as a guide only. WSN recognizes that individual companies must develop health and safety policies and programs which apply to their workplaces and comply with appropriate legislation. It is generally current to the best of our knowledge, having been compiled from sources believed to be reliable.

This material does not constitute legal advice. While the information provided, including references to legislation and established practice, is current at the time of printing, it may become out-of-date or incomplete with the passage of time.

No warranty, guarantee or representation is made by WSN as to the absolute correctness or sufficiency of any information contained in this material and WSN assumes no responsibility in connection therewith; nor can it be assumed that all acceptable safety measures are contained in this material, or that other or additional measures may not be required in particular or exceptional circumstances.

While WSN does not undertake to provide a revision service or guarantee accuracy, we shall be pleased to respond to your individual request for information at any time. WSN assumes no responsibility or liability for any errors or inaccuracies that may appear in this material.

All rights reserved. This material is furnished under license and may only be used or copied in accordance with the terms of such license. The material contained within is protected by copyright. The reproduction or transmission of all or any part of this material without the prior written consent of WSN is a violation of national and international copyright laws.

Except as permitted by such license, no part of this documentation may be reproduced, translated, stored in a retrieval system, or transmitted, in any form or by any means, electronic, mechanical, recording, or otherwise, without the prior written permission of WSN.

TRADEMARK NOTICE

The WSN logo is a trademark of Workplace Safety North.

For additional copies of this material or for further information please contact:

Workplace Safety North

690 McKeown Avenue, PO Box 2050 Station Main

North Bay, Ontario P1B 9P1

Toll free: 1-888-730-7821 (Ontario)

Fax: 705-472-5800

www.healthandsafetyontario.ca/WSN

WE RESPECT YOUR PRIVACY

WSN values our clients and thanks you for your confidence in using WSN for your training, products and services. As our client, you trust us with your personal information. We respect that trust and want you to be aware of our commitment to protect the information you share in the course of doing business with us. For more information, contact us at the toll-free number above.
Table of Contents

1. Introduction ........................................................................................................................................ 5
2. Process for Developing a Program Element .............................................................................. 7
3. Program Element Template ....................................................................................................... 11
4. Program Element Example- Fall Arrest .................................................................................. 15
1. Introduction

The Building Blocks of Workplace Health and Safety

A health and safety program is one of the crucial ingredients for good health and safety performance in a workplace. The health and safety program is a plan to address and control all hazards in the workplace. A program element is a module or chapter in that plan, focused on a single specific hazard, or on a process such as incident investigation or workplace inspection. The program element is aimed at eliminating or controlling the hazard or implementing the process. It identifies in detail the particular standards, equipment and procedures required to do that.

The health and safety program must work in conjunction with a health and safety system, which establishes roles, responsibilities and relationships across the company.

How To Use the Guidline

The guideline is intended to provide a step-by-step approach to developing an element for a health and safety program. It includes a flow chart outlining the main steps, plus a template companies can use to create various program elements. The template is included on CD — the file can be saved to computer and then each of the boxes in the form completed for each element. Section C of this guideline offers further explanation for each section of the template. Descriptions are included as bullet points in the boxes. Also included in this document is a sample program element, which illustrates how a completed element would look. The sample focuses on fall arrest. It is only for information, and should not be adopted as-is — every company must develop a program and elements specific to the needs and hazards of its own operation. The full program element for a workplace would likely address all aspects of the hazard of working at heights, including guarding, travel restraint, fall arrest, emergency response, communications etc. However, to make the length and detail of the example more manageable, this guideline narrows the focus to fall arrest.
2. Process for Developing a Program Element

1. Site assessment — The first step in developing any program element is recognizing the need for it. This could be the result of a safety audit, a gap identified while developing the safety program, the introduction of a new process or piece of equipment, or the identification of a hazard. Safety staff, affected workers and joint health and safety committee members or health and safety representatives should be involved in this step, and should ask themselves “what hazards and processes need to be addressed as part of our health and safety program?”

2. Elimination of hazards — The best option is always to eliminate a hazard completely. For example, if a fall hazard is identified, perhaps workers don’t need to be near the top of the crusher or the open hole at all. If there is a risk of injury for employees lifting heavy boxes, perhaps a lifting device can remove the need for manual material handling. If a hazard can be eliminated completely, it may not be necessary to develop the program element.

3. Introductory sections of program element — If the hazard cannot be eliminated, or if the program element deals with a process like incident investigation, then begin by completing the initial parts of the template: the title, location, and applicable codes, standards, guidelines and legislation. The sections for approvals, issue date and revision date will not be filled out until the program element is completed and ready to be issued.

4. Risk/hazard assessment — Conduct a complete assessment to identify and document all locations or instances when a worker may be exposed to the hazard being addressed, or all occasions when the process being addressed may be required. Asking the question “what if” while touring the workplace will help to identify potential risks. Refer to standard operating procedures, codes, standards, guidelines and legislation. This provides vital background information for the development of the program element.
1. Process for Developing a Program Element

5. Scope and purpose — Prepare a detailed scope statement, including where and when the program element applies, to whom it applied, and any terms or definitions that may be required to clarify other information in the program element. The purpose details the significance of the element and set out specific objectives.

6. Policy, standards, procedures, roles and responsibilities — Include the company or site policy statement in regard to this specific program element — not the general health and safety policy statement. The policy will be management’s commitment in regard to addressing this hazard or process. Detail all the standards which must be met in addressing this hazard or completing this process. These may include items like frequency of refresher training, procurement standards, equipment requirements, inspection frequency or requirements for response time to concerns or incidents. Develop all relevant procedures and list them in this section. (The procedures themselves may be stored elsewhere. The program element should refer to each one and explain where to find it.) List roles and responsibilities for those involved in carrying out the program element.

7. Implementation — Consider how the element will be put into practice, and complete the sections on communication, training and evaluation. Identify approaches to communication, training and evaluation and who will be responsible. Go back and fill in the review/revision dates. Finally, when the element is complete, fill in the “approved by” and “date of issue” sections.
Guideline for Developing a Health and Safety Program Element

Program Element Process Flow Chart

1. Site assessment
2. Elimination of Hazards
3. Introductory sections
4. Risk/hazard assessment
5. Policy, procedure, standards, roles and responsibilities
6. Implementation
7. Communication
8. Training
9. Evaluation

- Title
- Location
- Purpose
- Scope
### 3. Program Element Template

**Introductory sections**

<table>
<thead>
<tr>
<th>Title:</th>
<th>Title and/or reference number for the program element</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Date of Issue:</th>
<th>When program element was released for implementation</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Approved by Manager/JHSC:</th>
<th>Person responsible for the program, or where applicable, joint health and safety committee representative</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Review/Revise Date</th>
<th>To be review on or before laste date reviewed:</th>
</tr>
</thead>
</table>

- Date set by company for review of the program element, or date set by order of MOL inspector. Every program should be reviewed/revised on a regular basis. A new review/revise date should be set as part of every review
- Catalogue all copies with location so they can be replaced when the element is updated

<table>
<thead>
<tr>
<th>Location:</th>
<th>Where does this program element apply- all company locations, or specific sites? If not all locations, each site where element is applicable should be listed.</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Legislation:</th>
<th>Detail all applicable legislation including Occupational Health and Safety Act, Regulations for Mines and Mining plants and others</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Include relevant Ministry of Labour guidelines, codes of practice, standards etc.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Risk/Hazard assessment:</th>
<th>Description of the process used to identify risks or hazards in the workplace, or gaps in the safety program</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Specific hazards identified</td>
</tr>
<tr>
<td></td>
<td>Classification of hazards according to severity and urgency</td>
</tr>
</tbody>
</table>
Guideline for Developing a Health and Safety Program Element

Scope and Purpose

Scope:
- Specifically everyone to whom the program element applies, by job function, department, and/or location
- When the program applies- at what times or under what circumstances
- Definitions that help explain the activities or requirements in the program element

Purpose:
- Significance of the program element
- Intention of the program element
- Program element objectives
- Briefly how the objectives will be achieved
- Compliance with Occupational Health and Safety Act and relevant legislation

Policy, standards, procedures, roles and responsibilities

Policy, company standards, and procedures:
- Statement of company policy specifically regarding this program element
- Applicable company standards (e.g. purchasing standards, training standards)
- List of relevant procedures (standard operating procedures) required by the program element

Roles and responsibilities:
- List of each person involved in the program element, by job function or title
- Details of each person’s specific role in regards to the program element to ensure clear lines of responsibility (e.g. communication, procurement, etc.)
- Enforcement details for responsibilities
Guideline for Developing a Health and Safety Program Element

Implementation

**Communication:**
Detailed communication plan for both initial and ongoing implementation should include:

- What information will be communicated (e.g. procedures, standards, roles and responsibilities, changes to legislation)
- Who needs to receive information (e.g. workers, supervisors, engineering, JHSC etc.)
- How the information will be communicated (e.g. safety meetings, memos, bulletin boards)
- Who will be responsible for communication
- How non-routine communication will be handled

**Training:**
- What training is required for the program element
- Who receives and who delivers the training; when, where and how often
- How training will evaluated (e.g. demonstration of knowledge or skill)

**Evaluation:**
- Who will be responsible for evaluating the effectiveness of the program element
- Who will develop action plans to address any identified gaps, and who will ensure action plans are completed
- When and how frequently evaluation will take place

Appendices

**Forms:**
- List and samples of forms and checklists required by the program element
- Steps for distributing and storing forms

**Reference materials:**
Documents required by or referred to in the program element, with relevant page numbers and locations, including:

- Relevant legislation, guidelines, codes and standards
- Manuals, blueprints, floor plans, Glossary of terms
### 4. Program Element Example- Fall Arrest

<table>
<thead>
<tr>
<th>Title:</th>
<th>Fall Arrest</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Issue:</td>
<td>November 2008</td>
</tr>
<tr>
<td>Approved by Manager/JHSC:</td>
<td></td>
</tr>
</tbody>
</table>

**Review/Revise Date**
- To be review on or before: June 2009
- Last date reviewed: November 2008
- 5 copies to be retrieved: HR office, safety office, VP operations office, training office, JHSC room

**Location:** All facilities, including underground and surface plant

**Legislation:**
- R.R.O 1990, Regulation 854, Mines and Mining Plants, Sections 14, 60, 94 and 190'
- O. REG. for Construction Projects 213/91, Sections 26, 26.1 to 26.9
- O.REG. for Industrial establishments, Sections 85, 86
- CSA Standard Z259, Personal Fall Arrest Systems

**Risk/hazard assessment:**
- Complete site hazard assessment conducted in June 2008 by joint health and safety committee, using Workplace Hazard Assessment Form (refer to completed assessment in JHSC records, June 2008)
- Fall hazards eliminated or controlled (guarded) where possible
- Potentially serious hazards requiring use of fall arrest equipment were identified:
  - Underground in stopes #5 and 11 (open holes)
  - When shaft inspections being conducted
  - Where employees conducting maintenance on head frame and plant roof
  - For non-routine hazardous tasks such as shaft maintenance, slinging equipment in shaft
- Regular hazard assessments will be conducted annually as part of the review of this program element. For non-routine hazardous tasks, risk assessment will be conducted before task, as per procedures outlined.
Scope:
This program element applies to all employees, any and all contractors, vendors and visitors, including but not limited to:
- Underground diamond drillers
- Production crews
- Shaft inspection crews
- Hoistman
- Maintenance employees

The program element applies in all underground development and production sites, smelter, warehouse and in any location workers are exposed to the possibility of falling more than 3 metres (10 feet).

Definitions:
Fall arrest- the wearing of a full-body harness connected to a shock-absorbing lanyard, connected to a self retracting device that is attached to an approved anchor point that will limit and arrest a fall to less than one metre.

Fall arrest system- a fall arrest system is considered to include:
- a CSA approved full-body harness equipped with a shock absorber and trauma straps
- a CSA approved lanyard of proper length
- a self retracting device
- an engineered anchorage point capable of resisting a force of 5000 lbf (22.2 kN)
Guideline for Developing a Health and Safety Program Element

Purpose:
Falls from heights are a key hazard at this operation, with the potential to cause serious injuries and fatalities. The intent of this program element is to eliminate fall-related incidents and injuries through the identification and control of fall hazards and effective use of fall arrest equipment.

Specific program element objectives:
• To ensure that hazards requiring use of fall arrest are properly identified
• To ensure fall arrest equipment is purchased, installed, maintained and stored according to company standards and manufacturer recommendations
• To ensure employees are trained to inspect, don and use fall arrest equipment correctly
• To ensure compliance with Occupational Health and Safety Act and regulations

Policy, company standards, and procedures:
A. Company policy:
Our company believes that protection of workers from injury from accidental falls is critical to safe operation of our organization. We will follow all applicable legislation, manufacturer’s recommendations and take every precaution reasonable to protect workers from being subject to inadvertent falls from elevations. Therefore, a fall arrest system must be worn when any of the following hazardous conditions exist:
• a fall hazard of more than three (3) metres (10 feet)
• a fall hazard into operating equipment at any height
• a fall hazard into water or other liquid at any height
• When a worker is in an area where any bulk material is being pulled from below
B. Company Standards:

- Management will provide suitable fall arrest equipment in good working condition. Fall arrest equipment will comply with CSA standard Z259.
- Management will provide employees with annual training in fall arrest and proper inspection of fall protection equipment. Training will be conducted by a qualified, certified trainer.
- All fall arrest equipment will be properly stored, inspected and its condition logged before each use.
- Equipment found not to be in good working condition will be destroyed and replaced immediately and will be reported to a supervisor and the Health and Safety Co-ordinator.
- No worker wearing fall arrest shall work unattended. The buddy system will be used to ensure proper harness wear and use. Adequate rescue equipment and trained personnel shall be provided.

C. Procedures:

Relevant Procedures — Complete procedures can be found in procedure binders in administration office, warm-up area and supervisors’ station.

SOP#201: Procedures for procurement of health and safety equipment
SOP#301: Installation of engineered anchors for fall arrest
SOP#302: Maintenance and inspection of fall arrest equipment
SOP#303: Proper donning and removal of fall arrest equipment
SOP#304: Correct storage of fall arrest equipment
SOP#305: Emergency response procedures in event of a fall from height
Guideline for Developing a Health and Safety Program Element

**Roles and responsibilities:**

**Manager/Designate:**
- Oversees the development and administration of this policy/procedure in the facility
- Verifies that procedures is in use

**Health and Safety Co-ordinator:**
- Monitors compliance to the procedure
- Evaluates the program element for its effectiveness and reviews annually or as required
- Ensures the policy/procedures comply with current legislation, guidelines, codes, standards and manufacturers’ recommendations
- Ensures contractors are made aware of company policies and procedures
- Acts as a resource to management and workers to assist in their responsibilities under this program element

**Human Resources Manager**
- Facilitates the training of new and current employees, and follow-up training of current employees
- Ensures trainer/training courses meet required standards
- Records attendance, participation and successful completion of initial and follow-up training

**Supervisors**
- Confirm that employees (including contractors, vendors and visitors) are trained and aware of this program element and are in compliance with the procedures
- Make available all necessary safety items, such as a harness and lifeline
- Ensure all fall arrest equipment is used as prescribed, when and where required
- Immediately remove/replace any faulty equipment for service reported to them
- Ensure logs are completed as required
Workers/Contractors/Vendors/Visitors
- Participate in any required training
- Use fall arrest equipment and comply with standards as required by regulations/ manufacturers’ recommendations and the program element
- Report to supervisor and the Health and Safety Co-ordinator any defect in any fall arrest equipment or any other concern
- SHALL NOT make ineffective any protective device

Joint Health and Safety Committee/Safety Representatives
- Monitor / evaluate this policy/procedure and make recommendations as they deem necessary
- Ensure regular inspection of fall arrest anchor points
Workers/Contractors/Vendors/Visitors
• Participate in any required training
• Use fall arrest equipment and comply with standards as required by regulations/manufacturers’ recommendations and the program element
• Report to supervisor and the Health and Safety Co-ordinator any defect in any fall arrest equipment or any other concern
• SHALL NOT make ineffective any protective device

Joint Health and Safety Committee/Safety Representatives
• Monitor / evaluate this policy/procedure and make recommendations as they deem necessary
• Ensure regular inspection of fall arrest anchor points

Communication:
The Site Manager communicates through meetings with the Health and Safety Co-ordinator and Human Resources Manager that the policy/procedure is being followed.

The Human Resources Manager ensures all workers as well as contractors on site are informed of the policy/procedure through written and verbal instruction during training and orientation.

Before the work/job is started, the supervisor must meet with the worker(s) to review procedures, discuss the specific requirements of the job and confirm the workers have received adequate training.

Before the work/job is started the worker confirms the supplied fall arrest equipment is good shape by completing and signing the equipment inspection log or that the equipment has failed inspection by informing the supervisor.

Changes to procedures and standards will be communicated to workers by the supervisors and trainers through safety meetings and refresher training.
Training:
Employees will receive training in fall arrest:
• Upon hiring and before initial use and inspection of fall arrest equipment
• Annually thereafter as a refresher course

The training will include classroom theory (legislative requirements, internal procedures and specific procedures), and a practical exercise in the use of fall arrest equipment.

Training will be provided by a qualified health and safety trainer either employed by the company or contracted by the company.

Evaluation will be through the use of a short (10 question) written test – 80 percent required for pass, and the successful completion of a practical exercise.

Worker will be deemed competent upon successful demonstration of skills required for fall arrest in the workplace.
Evaluation:
The program element will be evaluated by the Health and Safety Co-ordinator, with assistance from the training department and joint health and safety committee.

The program element will be evaluated:
• annually, and
• immediately following changes to any relevant legislation and/or standards
• following any related incident investigation

The program element will be evaluated through:
• a risk assessment of all potential fall hazards
• consultation with the Site Manager, Human Resources Manager, JHSC, Health and Safety Coordinator, supervisors
• review of training records to ensure training is being completed as required
• audit of work involving fall arrest to ensure policies/procedures are being followed
• a review of incident reports for possible failures of policy/procedures
• a review of changes to the legislation and other standards that apply to this program
• persons properly trained in evaluation techniques