

**STATEMENT of POLICY and PROCEDURE**

Manual:	Human Resources	SPP No.	<b>HR 2.12</b>
Section:		Issued:	March 2011
Subject:	<b>Internal Responsibility System</b>	Effective:	Mar 7 2011
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Issued by:	Chief Operating Officer	Approved:	Mar 7 2011

## 1 PURPOSE

At the Thunder Bay Regional Research Institute, health and safety is a priority. Training and knowledge of individuals engaged in the Science program at TBRI is a key component of this. All employees of the Institute, and those working with employees of the Institute – be they hospital employees, students, visiting scientists, physicians, contract workers and visitors are entitled to a safe and healthy workplace. This also includes the right to site-specific training and knowledge of the environment in which they are functioning.

The principle underlying the Occupational Health and Safety Act (OHSA) is that all individuals share accountability for employee health and safety. This joint partnership among all stakeholders is referred to as the Internal Responsibility System (IRS).

The provisions of the Occupational Health and Safety Act establish an organizational framework for prevention by outlining strict legal rights and responsibilities for all individuals within the workplace. The framework outlines an internal responsibility system where the employer, worker and manager/supervisor share joint responsibility for identifying and solving health and safety issues.

## 2 SCOPE

This policy will apply to all individuals engaged in activities at or with TBRI. They include employees of the Institute, and those working with employees of the Institute – be they hospital employees, students, visiting scientists, physicians, contract workers and visitors.

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### 3 POLICY

TBRRRI is responsible for the provision of information, programs and resources to maintain the Internal Responsibility System and to ensure compliance with all relevant legislation.

1. Health and safety is integrated into all management activities. All managers and supervisors who manage an activity also manage the risks of that activity and its associated health and safety requirements. Each level of management is responsible to those below them and accountable to those above them with respect to health and safety as with all other management activities.
2. All employees set a high standard for safety by personal example and by ensuring that safe practice is a routine.
3. All individuals in the workplace have a responsibility for identifying hazards, instituting controls and reporting unresolved safety issues.
4. Whenever an employee is not working in accordance with health and safety policies, corrective action must be taken. A dangerous working condition is to be dealt with in accordance with the provisions included of the Occupational Health and Safety Act and/or other legislation, policies, or practices.

All individuals working for or with the Thunder Bay Regional Research Institute will comply with all relevant legislation, as well as the policies and procedures.

Individuals who fail to meet their obligations concerning health and safety may, depending on the circumstances, face appropriate disciplinary action, up to and including discharge.

### 4 DEFINITIONS

*OH&S Act* – Ontario's Occupational Health & Safety Act

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*JHSC* – Joint Health and Safety Committee as defined under the Act

*Supervisor* – as defined under the OH&S Act

*Worker* – in addition to the OH&S Act definition, in this policy the definition also includes any student or visitor that is participating in activities at or with TBRI.

*Scientist* – means any level of Scientist or Clinician Scientist who has overall responsibility for a research program and staff

*Manager* – within the document used to collectively refer to Scientists, Directors, VPs, Coordinators, or Supervisors that have control over a workplace or individual(s)

## **5 PROCEDURE**

### Health and Safety Policy

The Occupational Health and Safety Policy is a requirement under the Occupational Health and Safety Act. The policy demonstrates the commitment of management to health and safety. Under this policy, health and safety procedures should be fully integrated into policies and practices of the Institute.

### Accountability

It is the responsibility of the Board of Directors, through the management structure, to ensure that statutory health and safety requirements are met and appropriate standards applied.

Management may delegate the routine responsibilities for the day to day administration and enforcement of safety practices to suitably qualified staff; these managers remain legally responsible and accountable.

Therefore Management must:

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- appoint staff that act effectively on its behalf
- establish adequate communication, reporting and supervisory links with the staff involved and
- provide adequate direction and resources to staff that act on their behalf

Direct Responsibilities

The organizational structure supports safety management and takes into account:

1. The formal delegation of responsibilities and authority for health and safety to individuals throughout all levels of the organization, e.g. by including health and safety functions in job descriptions.
2. The maintenance of a consultation process on health and safety matters, e.g. via the Joint Health and Safety Committee (JHSC).
3. The provision of professional and technical health and safety resources through the HR Department.
4. The requirement of all management to manage health and safety activities in their areas.

Board of Directors

The Board of Directors will take all reasonable care to ensure that the TBRRRI complies with the Occupational Health and Safety Act and regulations, all orders, and requirements of inspectors including the Minister of Labour.

Chief Executive Officer

The CEO is responsible to inform the Board of Directors on any significant events, which will enable them to perform their responsibilities pursuant to the Occupational Health and Safety Act or other applicable legislation. The CEO provides the leadership, resources and an environment that will ensure that everyone can do safe and healthy work.

Chief Operating Officer

The COO is responsible to:

1. Oversee and support activities regarding the development, implementation and maintenance of the Occupational Health and Safety program.
2. Approve policies and other actions to implement the Occupational Health and Safety Act, the regulations and other applicable legislation.

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3. Present to the CEO and Board of Directors a report on health and safety activities within the Institute.
4. Report to the CEO on Ministry of Labour or other regulatory agency orders issued to the Institute and any significant events that occur.

Vice President / Directors / Managers / Scientists

VP/ Directors / Managers / Scientists are responsible for ensuring adequate arrangements are in place so as to ensure compliance with applicable guidelines and regulations, as defined in the Occupational Health and Safety Act. They remain responsible for all components of health and safety within their areas. Their responsibilities include:

1. The provision of necessary equipment, information, instruction and training that enable staff to perform their job in a safe manner.
2. The introduction and maintenance of measures or systems designed to identify monitor and control risks, and to make recommendation for any improvements as necessary.
3. Assist in the maintenance of appropriate records sufficient to demonstrate compliance with their duties and obligations, e.g. participate in monthly workplace inspection, ensure their staff completes WHMIS training and that all other training and training records are completed, participate in accident investigations, and assist in the development of departmental policies and procedures.
4. Follow up on any identified corrective action, in conjunction with the JHSC.
5. The proper provision of supervision of students and new staff or visitors as well as ensuring any health and safety concerns are reasonably addressed.
6. Ensuring that coordinators, supervisors, or those that assume the role of supervisor for them are competent and accountable for the responsibility delegated to them.

Supervisory Personnel/ Coordinators

Supervisors / Coordinators must ensure that those activities over which they have control are conducted in a safe manner and in accordance with policies and applicable legislation. This includes:

1. To be competent in respect to health and safety.
2. To ensure that the workers that they have responsibility for are aware of the hazards of their jobs and the protective measures they need to take.
3. To enforce the use of all safety equipment required.

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4. To provide written instructions as applicable for their staff to ensure the health and safety of the staff they have responsibility for.
5. To address any identified health and safety concerns and assume responsibility for corrective action.

Employees/Workers

Employees, in addition to the duties imposed by legislation or contract, are responsible for:

1. Complying with the policies, procedures, rules, standards and practices developed under health and safety in addition to complying with duties imposed by law.
2. Reporting promptly to supervisors/managers any observed contravention of the Occupational Health and Safety Act, policies, procedures or any workplace hazard of which they are aware, and if the issue is not resolved, to contact a Joint Occupational Health and Safety Representative.
3. Refrain from any activity, which may jeopardize the health and safety of others.

Supervisors of Independent Contractors or Visitors

Any employee who is responsible for hiring or overseeing an independent contractor, or bringing in visitors, to performing work within the centre must ensure that:

1. The contract documents have been signed and applicable information obtained from the individual.
2. Relevant information relating to workplace hazards and occupational health and safety is communicated to the individual.
3. Requirements for complying with policies, programs and applicable legislation are monitored and enforced.

Contributive Responsibilities

The role of the contributive players is to make sure that those with direct control are doing it correctly. They have the roles to be 'trainers' to the direct players, and to monitor and correct their actions. Some of the key contributive players are the Joint Health and Safety Committee (JHSC), and the HR Department.

*Joint Health and Safety Committee*

The Joint Occupational Health and Safety Committee is a legal requirement under the Occupational Health and Safety Act. The committee consists of equal representation of

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worker and management members and functions as an advisory body. The JHSC is responsible for recognizing workplace hazards; making recommendations for the improvement of health and safety of workers; establishing, maintaining and monitoring health and safety programs; conducting workplace inspections and consulting about hygiene testing. Recommendations to the JHSC can be directed to specific managers.

*HR Department*

The HR Department acts as a resource on issues related to health and safety. HR advises on a wide range of health and safety issues and undertakes a central coordinating role for the development, implementation and maintenance of health and safety programs.

Training

Management has a legal obligation to ensure that workers are adequately trained to perform all their work safely and are given adequate supervision. This involves informing them of hazards in the workplace and the procedures and protective measure to protect them. The degree of supervision required needs to be related to the "competency" of the individual being supervised.

All workers attend safety orientation before they start work – which is to include WHMIS and review of the Workplace Safety Handbook, which references relevant hazards and risk to health and safety to be outlined. It is our policy to ensure and require all workers to be familiar with the policies of the organizations' Occupational Health and Safety program.

Monitor Performance

Under the Occupational Health and Safety Act a portion of the workplace must be inspected monthly by the JHSC. Managers are expected to take action to address issues identified by the committee.

Management is still legally responsible to ensure that their workplace is in compliance with Occupational Health and Safety Act and that every reasonable precaution is being taken to protect worker. Managers will be expected to complete monthly departmental safety inspections and to institute a system for continuous feedback on workplace hazards for their departments.

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When accidents or near misses, occur, managers will investigate them with the intent to determine the cause and to identify and implement appropriate changes to prevent reoccurrence.

Risk Assessment

The Occupational Health and Safety Act requires that an employer acquaint an employee with any hazards in the workplace.

Managers must ensure that appropriate risk assessment has been carried out in their departments. Risk assessments should be done to determine the measures that must be taken to enable work to be carried out safely. Controls must be put in place to eliminate or minimize the risk to workers.

Due Diligence

Due Diligence means taking all reasonable care to protect the well being of workers or co-workers. To meet the standard of due diligence all precautions reasonable must be taken. This is not limited to documentation of training, performance reviews and a health and safety program. It also involves evidence that each worker in the organization is supervised and held accountable for compliance to health and safety policies and procedures.

I, \_\_\_\_\_ (please print), the undersigned, have read and understood the policy, it's intent, and it's application.

**X**

Signature

Date: