



**Safety
Groups
Advantage
Program**

2018

Employer Requirements



Welcome to the 2018 Safety Groups Advantage Program

Objectives:

The 2018 Advantage Program is designed to:

- Provide firms with the advantage of continuing in the Safety Groups Program to develop and implement a comprehensive audit of their Health and Safety Management System (HSMS).
- Equip firms with the tools and knowledge to continue annual internal HSMS Audits to improve their safety performance and culture.
- Support the maintenance of a fully functioning Health & Safety Management System.
- Allow firms flexibility to select a Health and Safety Management System audit criteria suited to their business needs.

Firm Eligibility:

- The Advantage Program is recommended for firms who have successfully completed 5 years in the Safety Groups Program.
- All Advantage Program participants must meet the *Participation Requirements for Firms* as outlined on page 8 of the *Safety Groups Program – Employer Guidelines (5th edition)*.

4th & 5th Year Safety Group Participants:

- A firm who has successfully completed 3 or 4 years in the Safety Groups Program can request Sponsor approval to participate in the Advantage Program. *It is the responsibility of the Sponsor to evaluate the firm's resources and ability to successfully participate in the Advantage Program.*
- Firms that decide to participate in the Advantage Program in their 4th or 5th year can not reverse their decision and return to the regular Safety Groups Program in 2018 or future years.
- A 4th or 5th year firm that withdraws or is removed from the 2018 Safety Groups Program will have the option to return to the regular Safety Groups Program the following year.
- A 4th or 5th year firm that opted to enter the Advantage Program in 2017, or a prior year, must continue in the Advantage Program in 2018.



6th Year Safety Group Participants:

- Firms entering their 6th year of Safety Groups Program participation, who do not feel ready for the Advantage Program requirements, can continue in the regular Safety Groups Program in 2018, with the following conditions:
 - i. must select, or maintain, Element A.6 - Health & Safety Management Review Document (Internal Audit), and
 - ii. select the group element, and
 - iii. select 3 new additional Safety Group elements, and
 - iv. maintain all previous elements (25).

Note: Firms entering their 6th Safety Group Program year that opted to move into the Advantage Program in a previous year do not qualify for this option.

Multiple Account Firms:

- Firms with multiple WSIB accounts participating in the regular Safety Groups Program and/or the Advantage Program should speak to their Sponsor and WSIB Safety Groups Program Consultant to ensure each account is correctly registered.
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2018 Advantage Program Due Dates:

Documents are completed for each WSIB account registered in the Advantage Program and submitted to your Safety Groups Sponsor.

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| • 2018 Application Form | December 31, 2017 |
| • Audit Equivalency Form (if required) | February 16, 2018 |
| • 2018 Action Plan | February 28, 2018 |
| • 2018 Progress Reports | Spring & Fall 2018 |
| – <i>Spring Progress Report should include a copy of the 2018 Audit Plan</i> | |
| • 2018 Year-End Report Checklist | December 15, 2018 |

Note: Safety Groups Program Sponsors are permitted to establish earlier due dates to allow sufficient time to review the documents before submitting to WSIB.



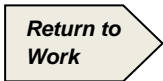
2018 Advantage Program Requirements:

This entire document should be reviewed and understood prior to commencing the 5 Advantage Program Requirements. Any questions should be directed to your Safety Groups Program Sponsor or WSIB Safety Groups Program Consultant.

Resources / Tools:	Program Requirements:
<ul style="list-style-type: none"> • Sample HSMS Audit Program Standard • 2018 Advantage Program Timeline Guide • WSIB <i>Intro to Auditing</i> training program 	<ol style="list-style-type: none"> 1. Write and implement a company standard outlining detailed policy and procedures for your HSMS Audit Program (internal health & safety audit). The standard must include, but is not limited to, the following: <ol style="list-style-type: none"> 1.1 Current date (2018). 1.2 Specific reference to your firm. 1.3 Roles and Responsibilities for Senior Management, Auditors, Managers, Supervisors, Workers. 1.4 Auditor(s) qualifications (see requirement 2). 1.5 Development of a documented Audit Plan that addresses - audit criteria, scope, schedule, roles and responsibilities, and approvals. 1.6 Development of a documented Continual Improvement Plan process that identifies priorities (high-risk hazards, and legal requirements) based on the findings of the HSMS Audit, and details specific corrective actions, responsibilities and timelines to bring all non-conformities into conformity. 2. Provide formal auditor training (or verify previous training) for the assigned Auditor(s) to the qualifications outlined in your written company standard prior to commencing the 2018 HSMS Audit. <i>Minimum Auditor Qualification: Formal Audit Training - see page 8 for additional details.</i> 3. Review of the 2017¹ HSMS Audit/Report and Continual Improvement Plan documents (<i>1st year Advantage Program participants review their 2017 Safety Group Program Evaluation and Making Improvements Plan</i>) by the Auditor to: <ol style="list-style-type: none"> 3.1 Confirm all non-conformities from the 2017

¹ *If your firm was not registered in the 2017 Safety Groups Program or Advantage Program, use your last year of participation or implementation.*

<ul style="list-style-type: none"> • Approved Audit Criteria listed on Page 8 • Audit Equivalency Form • Work Re-integration Summary & Checklist <p>WSIB Work Re-integration (WR) Policies are available on-line at -www.wsib.on.ca</p> <ul style="list-style-type: none"> • 19-02-01 WR Principles, Concepts & Definitions • 19-02-02 Responsibilities of the Workplace Parties in WR • 19-03-03 Determining Suitable Occupation • 19-03-05 Work Transition Plans • 19-03-06 Work Transition Expenses • 19-03-11 Relocation Expense <p>Construction firms – the WSIB's WR policies, with the</p>	<p>HSMS Audit were included on the 2017 Continual Improvement Plan (1st year Advantage Program participants confirm prior Safety Group elements were evaluated (step 4) and the Improvement Plan (step 5) was implemented to program requirements), and</p> <p>3.2 Review all completed/achieved non-conformity Continual Improvement Plan corrective action items for implementation and effectiveness, and</p> <p>3.3 Review the current status of all ongoing/open non-conformity Continual Improvement Plan corrective action items to determine if implementation is progressing as planned to successful completion.</p> <p>The Auditor's findings from 3.1, 3.2, and 3.3 are formally documented in the 2018 HSMS Audit Report, for review by Senior Management, and any deficiencies are added as a non-conformity to the 2018 Continual Improvement Plan.</p> <hr/> <p>4. Complete an approved² HSMS Audit in 2018, by the qualified Auditor(s), that must include, but is not limited to, the following:</p> <p>4.1 The selected HSMS Audit must include a Return-to-Work (RTW) Section that is audited to the WSIB Work Re-integration (WR) Policies. (Section D.3 of the HSMS Review Form or Section 12 of the Workwell Evaluation Tool (current edition) is completed as an addendum if your selected HSMS Audit does not include a RTW Section.)</p> <p>4.2 Detailed documentation (listing) of all objective supporting evidence collected by the Auditor(s) for each audit criteria requirement.</p> <p>4.3 Based on the collected audit evidence the Auditor(s) documents a stated finding of conformity or non-conformity for each audit requirement.</p> <p>4.4 An audit finding of conformity requires the Auditor to document (list) detailed evidence of: (a) the applicable and current written company standard (first source of evidence), to the audit criteria, <u>and</u> (b) sufficient corroborating audit evidence from</p>
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² Firms must state on their submitted 2018 Action Plan form the audit criteria they are using, otherwise, the audit will default to the WSIB HSMS Review Form criteria. See page 8 for a list of approved audit criteria.

<p><i>exception of the specific provisions dealing with re-employment, apply to all workers and employers, including those in the construction industry. The WSIB's re-employment policies applicable to the construction industry can be found on-line in the 19-05 section of the Operations Policy Manual</i></p> <ul style="list-style-type: none"> Continual Improvement Plan Samples 	<p>the other 3 sources of evidence, as applicable:</p> <ul style="list-style-type: none"> - (i) review and listing of required records, and/or - (ii) review and listing of appropriate observations of people working and observations of the physical worksite, and/or - (iii) listing of interview findings with appropriate people. <p>An audit finding of non-conformity requires the Auditor to document (list) the evidence that could not be verified following the same audit process outlined above.</p> <p>4.5 Sign-off, with date, of the completed audit document and any additional audit reports or material, by the assigned Auditor(s).</p> <p>4.6 Documented evidence, with date, of Senior Management³ review and acceptance of the completed audit document and any additional audit reports or material.</p> <hr/> <p>5. Develop and implement a documented 2018 HSMS Audit Continual Improvement Plan (CIP) that must include, but is not limited to, the following:</p> <p>5.1 Detailed and specific corrective action points for:</p> <ul style="list-style-type: none"> a) all audit findings of non-conformity, and b) all RTW/WR non-conformities, and c) all 2017 Audit/CIP Review (requirement 3) deficiencies. <p>5.2 Priority given to non-conformities related to high-risk hazards and legal requirements.</p> <p>5.3 The detailed corrective action points, for each non-conformity/deficiency, are planned to resolution with responsibilities assigned and expected timelines established for each action point.</p> <p>5.4 Senior Management must review and approve the documented CIP. This review and approval is documented.</p> <p>5.5 Senior Management must review the progress of the CIP on a quarterly basis until the CIP is completed and all non-conformities are corrected. The quarterly progress review is</p>
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³ Senior Management – Owner, President, CEO or equivalent. For the purposes of the Advantage Program, management with the authority to approve and commit company resources (time, people and money) for health and safety are considered senior.

	<p>5.6 documented. The approved CIP must be started no later than December 31, 2018, and all non-conformities and deficiencies must have corrective action points that start within 6 months of the audit being completed.</p> <p>NOTE: The development of the CIP often includes a firm undertaking a root cause analysis, and other planning activities, to determine the appropriate corrective actions and resources for each non-conformity. While these activities are important, they are not considered starting of the CIP. See example below.</p> <p>Firms have the option to develop an individual CIP for an individual non-conformity to expedite the implementation of corrective actions. Firms are expected to prioritize their non-conformities and start their CIP with corrective action for non-conformities related to high-risk hazards and legal requirements.</p>
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Example of a CIP being developed and started:

Non-conformity	Root Cause Analysis	Action Plan		Start Plan													
Audit date: August 1, 2018 Audit Section 4.2 f Worker observed setting-up Production Line A1 without locking-out equipment.	September 15, 2018 The Operations Department meet to discuss the non-conformity. The primary reason for failure to lock-out is determined to be faulty equipment design. Corrective measures will require significant capital expense – estimated at \$50,000.	December 1, 2018 <table border="1" style="width: 100%;"> <thead> <tr> <th>Activity</th> <th>Dates</th> </tr> </thead> <tbody> <tr> <td>1. Maintenance Supervisor to develop and train staff on interim lock-out procedure until equipment is redesigned.</td> <td>December 15, 2018</td> </tr> <tr> <td>2. Operations Manager to source and secure three contract bids to re-engineer faulty equipment.</td> <td>March 1, 2019</td> </tr> <tr> <td>3. Operations Manager and VP Operations to review and select successful contract bid.</td> <td>March 15, 2019</td> </tr> <tr> <td>4. VP Operations secures financing through budget process.</td> <td>April 30, 2019</td> </tr> <tr> <td>5. Contractor completes work.</td> <td>July 31, 2019</td> </tr> <tr> <td>6. H&S Manager evaluates for effectiveness.</td> <td>August 31, 2019</td> </tr> </tbody> </table>	Activity	Dates	1. Maintenance Supervisor to develop and train staff on interim lock-out procedure until equipment is redesigned.	December 15, 2018	2. Operations Manager to source and secure three contract bids to re-engineer faulty equipment.	March 1, 2019	3. Operations Manager and VP Operations to review and select successful contract bid.	March 15, 2019	4. VP Operations secures financing through budget process.	April 30, 2019	5. Contractor completes work.	July 31, 2019	6. H&S Manager evaluates for effectiveness.	August 31, 2019	December 15, 2018 1. Maintenance Supervisor documents interim lock-out procedure and training of all appropriate staff.
Activity	Dates																
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2018 Approved list of Audits:

- WSIB HSMS Review Form
- WSIB WorkWell Evaluation Tool (current edition - available on WSIB website)
- ZeroQuest Audit
- Infra-Structure Health and Safety Association Audit - Ontario Certificate of Recognition (COR)
- Public Service Health and Safety Association Q5 Audit
- Public Service Health and Safety Association HSMS Audit (Health Care only, Z1000 equivalent)
- Workplace Safety North (WSN) - Safe Workplace Ontario Safety Audit
- CSA Z1000
- OHSAS 18001
- ISO 45001 – if published - expected March 2018.

The Audit Equivalency Form is not required for any of the audits on the approved list.

Request to use an audit not on the approved list:

Firms can request to use other HSMS Audit criteria, such as corporate audits, for the 2018 Advantage Program. These audits must meet the WSIB HSMS Review Form criteria.

The firm must send the requested audit criteria and a completed Audit Equivalency Form to their Safety Groups Program Sponsor for review and initial approval by the due date. The Safety Group Program Sponsor is to ensure all the criteria outlined on the Audit Equivalency Form are met. If initially approved, the Safety Group Program Sponsor forwards the requested audit and the Audit Equivalency Form (with details of equivalency to the HSMS Review Form) to the Safety Group Program Consultant for final approval.

The request must be submitted by the Sponsor to the Safety Group Program Consultant by February 16, 2018 to allow processing time before the Action Plan due date of February 28, 2018.

HSMS Auditor Training Requirement:

The qualification standard is formal audit training. This qualification requirement can be satisfied with a health and safety, quality, food -safety, environmental, or other formal audit-specific training program. A record of audit training is required by all Advantage Program firms to meet the program requirement. This requirement also applies to firms hiring external or third-party auditor(s).

The Safety Groups Program developed the “Introduction to Auditing” training program to assist firms to meet the qualification standard if they do not currently have a person



meeting this requirement. This training program can be delivered by a Safety Group Sponsor or WSIB Safety Groups Program Consultant. Successful participation and completion of the training program will be recorded by the Sponsor to meet the record of training requirement.

Mid-Year Progress Visits:

A review of the progress of a firm's 2018 Advantage Program Action Plan may be conducted by WSIB Safety Groups Program Consultants during mid-year visits on a sampling of Advantage Program firms in each group. Results will be communicated to the firm and their Safety Group Sponsor.

Year-end Report Checklist:

All Advantage Program firms submit a 2018 Year-end Report Checklist, signed by Senior Management, by December 14, 2018 to their Safety Group Program Sponsor.

Advantage Program firms selected for a WSIB validation audit will be notified by their Safety Group Sponsor on, or before, February 15, 2019 and are required to submit the following documentation to their Safety Group Sponsor within two weeks of being notified of their selection for audit. Safety Group Sponsors forward the collected documentation to the WSIB by March 1, 2019.

Documents received by the WSIB by the due date will undergo a desk-audit to determine if sufficient program documentation was submitted by the firm to proceed with the on-site validation audit.

Documents received by the WSIB after the due date will not be accepted or reviewed and an audit score of zero will be assigned to the firm.

Revisions or additions to the submitted 2018 Advantage Program documents will not be accepted or reviewed by the WSIB following the March 1, 2019 deadline, including during the on-site validation audit.

1	A copy of the 2018 Written Company Standard for HSMS Audit Program and 2018 HSMS Audit Plan. <i>(Requirement #1)</i>	20%
2	A copy of the assigned Auditor(s) record of training. <i>(Requirement #2)</i>	20%
3	A copy of the Auditor(s) review and findings of the 2017 Audit and Continual Improvement Plan, or <i>Safety Group Evaluation and Making Improvements Plan. (Requirement #3)</i>	20%
4	A copy of the completed 2018 HSMS Audit that includes the detailed listing of objective audit evidence, audit findings, the Auditor(s) sign-off (with date), and documented evidence (with date) acknowledging Senior Management review and acceptance of the completed audit. <i>(Requirement #4)</i>	20%
5	A copy of the 2018 Continual Improvement Plan addressing the 2017	20%



	<p>Review deficiencies, and the 2018 HSMS Audit non-conformities. Documented evidence of Senior Management review and approval of the CIP (with date). The CIP must have an action point(s) that is started in 2018. Also, any quarterly progress reviews by Senior Management. (Requirement #5)</p>	
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Safety Group Program Sponsors can require firms to submit all Advantage Program documentation before December 15, 2018, or before being notified of validation audit selection. Your Program Sponsor can confirm your specific reporting requirements and the due date.

Maintenance of Elements: Maintenance of past Safety Group Program elements is not included in the score. The Maintenance of Elements Report(s) is not required to be submitted. It is an expectation of Advantage Program firms that the maintenance of previous Safety Group Program elements is continued each year. This on-going maintenance will provide the necessary evidence of conformity to the HSMS Audit criteria.

Validation Audits:

Each year the WSIB develops a validation audit strategy to verify the achievement of participating firms in each Safety Group. WSIB Safety Group Program Consultants will conduct desk and on-site validation audits of the selected firms.

The following will be verified by documentation review, records review, interviews, and/or observation of the facility and working processes:

- 1. Written Company Standard for HSMS Audit Program: 20%**
 - a. Standard must comply with all 2018 Advantage Program Requirements.
 - b. Verification of the written standard being implemented. Implementation is primarily verified by the WSIB Auditor being able to (i) confirm development and use of an audit plan, (ii) duplicate the findings of the completed audit based on a sampling of audit sections, and (iii) corresponding evidence of the CIP being developed, implemented, and reviewed as required.

- 2. Internal Auditor(s) Training: 20%**
 - a. Record of formal audit training for Auditor(s) complies with 2018 Advantage Program Requirements and the company's written standard.
 - b. Name on auditor training record must match name of auditor signing off on the completed audit document.
 - c. Training must pre-date the start of the HSMS audit; otherwise, the



validation audit score is zero.

3. Review of 2017 Audit and Continual Improvement Plan (or 2017 Safety Group Evaluation and Making Improvements Plan for 1st year Advantage Program participants): **20%**

- a. Documented evidence of review and findings by the Company Auditor following the 2018 Advantage Program Employer Requirements, and the company's written standard.
- b. WSIB Auditor may request to review the 2017 HSMS Audit and CIP, or Safety Group Evaluation and Making Improvement Plan, in an effort to duplicate and verify the findings of the Company Auditor.
- c. Verification of identified deficiencies being added to the 2018 CIP.

4. HSMS Audit: **20%**

- a. Approved HSMS Audit completed in 2018 following the 2018 Advantage Program Employer Requirements and the company's written standard.
- b. The selected audit includes a Return to Work section that was completed by the Company Auditor.
- c. Audit findings must be verifiable during the on-site WSIB Validation Audit. All supporting evidence listed by the Auditor must be available for review and verification during the WSIB Validation Audit.
- d. WSIB Auditor may request additional evidence from the firm to verify findings.
- e. Sign-off (with date) by Auditor(s).
- f. Documented evidence of Senior Management review and acceptance, with date, of the completed 2018 HSMS Audit.

5. Continual Improvement Plan (CIP) **20%**

- a. All deficiencies identified by the 2017 Audit Review and non-conformities identified by the 2018 HSMS Audit are addressed on the 2018 CIP following the 2018 Advantage Program Employer Requirements and to the company's written standard.
- b. The 2018 CIP has detailed and specific corrective action points for priority non-conformities being started and documented in 2018. If there are no priority non-conformities the 2018 CIP must still be started in 2018.
- c. Verifies all remaining non-conformities have corrective action points started and documented within 6 months of the audit being completed and are progressing based on the established timelines.
- d. All non-conformities are planned to resolution with responsibilities



assigned and timelines established.

- e. Documented evidence of Senior Management review of the 2018 Continual Improvement Plan.
- f. Documented evidence of Senior Management review of the CIP on a quarterly basis until all non-conformity corrective action points are successfully completed.

Additional Notes:

1. All Advantage Program requirements must be completed within the 2018 program year. The 2018 Advantage Program Timeline Guide is intended only as a best practice reference.
2. The Company Auditor(s) must verify corroborating evidence by conducting observations and interviews at the workplace being audited.
3. Firms who participated in the 2017 Advantage Program are expected to continue working on their 2017 Continual Improvement Plan until completed, or they have completed their 2018 HSMS Audit and developed an approved 2018 Continuous Improvement Plan. The 2018 Continual Improvement Plan may need to carry forward unfinished action points from the 2017 Continual Improvement Plan.
4. The firm may use a format of their choice for the Continual Improvement Plan as long as it meets Advantage Program requirements.
5. If a multi-location firm conducts their HSMS Audit by sampling only a portion of their locations (for example a business with 50 stores across Ontario, may plan to audit 20 stores) it is required that the Continual Improvement Plan is applied to all firm locations, and not just the locations where the audits were conducted. Using the above example, the Continual Improvement Plan must be applied to all 50 stores.
- 5.1 Firms that conduct their HSMS Audit by sampling only specific departments within their business must develop and implement a Continual Improvement Plan that is applied to all departments within the business, and not just the departments where the audit was conducted.
6. Firms are eligible to participate in the 2018 Safety Group rebate based on the submission of their Year-end Report/Checklist Form and achieving a minimum score of 60%. Firms selected for validation audit must achieve a minimum audit score of 60% to qualify for the rebate.
7. All Advantage Program firms must complete a 2018 HSMS Audit and develop and implement a 2018 Continual Improvement Plan to the 2018 Advantage Program requirements, subject to verification by validation audit, to qualify for the 2018 rebate. A firm does not qualify for the rebate by completing only the written standard, auditor training, and 2017 HSMS Audit and CIP Review.



8. All the applicable Terms and Conditions of Participation on the 2018 Safety Group Application Form and Safety Groups Program Employer Guidelines – current edition, apply to Advantage Program participants.