

2019

Safety Groups Advantage Program Employer requirements

Welcome to the 2019 Safety Groups Advantage Program

Objective: The 2019 Safety Groups Advantage Program is designed to offer a variety of program options that will allow firms to choose the best strategy to continue making meaningful health and safety improvements in their workplaces.

1. **New! Remain in the Safety Groups Program** - A firm that participated in the regular Safety Groups Program in 2018 (or any previous year) can choose to continue in the regular Safety Groups Program in 2019, regardless of the number of years of program participation. Firms are not required to transition to the Advantage Program after five or six years of Safety Groups Program participation. Firms will continue to apply the Safety Groups Program Employer Guidelines (5th edition).
2. **Move to the Advantage Program** - A firm that has successfully completed three or more years in the Safety Groups Program can choose to participate in the 2019 Advantage Program.
3. **Remain in the Advantage Program** - A firm that participated in the Advantage Program in 2018 (or any previous year) can choose to continue in the 2019 Advantage Program.
4. **New! Advantage Program back to Safety Groups Program** - A firm that participated in the Advantage Program in 2018 can choose to return to the regular Safety Groups Program in 2019 with the following requirements:
 - i. Based on the firm's 2018 HSMS Audit findings, convert five (5) priority and on-going audit non-conformities from the 2018 Continual Improvement Plan (CIP) that relate to high-risk hazards, legal requirements, hazard recognition and assessment activities, or return-to-work activities, into new 2019 Safety Groups Program elements.
 - ii. Attach a current copy of the firm's 2018 Advantage Program CIP with their 2019 Safety Groups Program Action Plan.
 - iii. Implementation of the five (5) converted priority audit non-conformities to new Safety Groups Program elements must follow the Safety Groups Program 5-Steps to Managing Health and Safety.
 - iv. Maintain all previous Safety Groups Program elements in 2019, with one exception: **the HSMS Audit Program Standard (SGAP Standard) does not need to be maintained in 2019.**
 - v. Firms that choose this new program option and are selected for a 2018 Advantage Program validation audit are required to continue working on their 2018 CIP until the development and approval (by senior management) of their 2019 Safety Groups Program Action Plan.

5. **New! Past Members not in a 2018 Program** - A firm that participated in the regular Safety Groups Program or the Advantage Program before 2018 can choose to:
 - (i) return to the regular Safety Groups Program and select five new elements and maintain all previous elements in 2019; or
 - (ii) if the firm has successfully completed three or more years in the Safety Groups Program, can choose to participate in the 2019 Advantage Program.

Regardless of the option selected, Safety Groups Program requirements as outlined in the 2019 Safety Groups Application Form, and on page 12 of the Safety Groups Program Employer Guidelines (5th edition) apply.

Advantage Program firm eligibility

- The Advantage Program is recommended for firms who have successfully completed five years in the Safety Groups Program.
- A firm that has successfully completed three or four 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.

Multiple account firms

- Firms with multiple WSIB accounts participating in the regular Safety Groups Program and/or the 2019 Advantage Program should speak to their Sponsor and WSIB Safety Groups Program Consultant to ensure each account is correctly registered in the appropriate program.
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2019 Advantage Program due dates

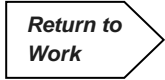
Documents are completed for each WSIB account registered in the Advantage Program and submitted to your Safety Groups Sponsor.

March 29, 2019 – extended deadline for firms to submit Application and Action Plan forms to Sponsors

- Audit Equivalency Form (if required) - **March 29, 2019**
- 2019 Progress Reports - Spring & Fall 2019
 - *Spring Progress Report should include a copy of the 2019 Audit Plan*
- 2019 Year-End Report Checklist - **December 31, 2019**

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

<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 	<p>3.1 Confirm all non-conformities from the 2018 HSMS Audit were included on the 2018 Continual Improvement Plan (<i>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</i>), 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 2019 HSMS Audit Report, for review by Senior Management, and any deficiencies are added as a non-conformity to the 2019 Continual Improvement Plan.</p> <hr/> <p>4. Complete an approved² HSMS Audit in 2019, 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 criteria 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></p>
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² Firms must state on their submitted 2019 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.

<ul style="list-style-type: none"> 19-03-11 Relocation Expense <p><i>Construction firms – the WSIB’s WR policies, with the 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>	<p>(b) sufficient corroborating audit evidence from the other 3 sources of evidence, as applicable:</p> <ul style="list-style-type: none"> - (i) review and listing of required <u>records</u>, and/or - (ii) review and listing of appropriate <u>observations</u> of people working and observations of the physical worksite, and/or - (iii) listing of <u>interview</u> 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>
<ul style="list-style-type: none"> Continual Improvement Plan Samples 	<p>5. Develop and implement a fully documented 2019 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 all priority non-conformities/deficiencies identified by the 2019 HSMS Audit and 2018 Audit/CIP Review (requirement 3).</p> <p>5.2 Priority non-conformities relate to high-risk hazards, legal requirements, hazard recognition and assessment activities, and return to work activities.</p> <p>5.3 All priority non-conformities/deficiencies must have detailed and specific CIP corrective action points that are planned to resolution with responsibilities assigned and include established timelines to ensure on-going implementation.</p> <p>5.4 The CIP must be developed, approved and started by December 31, 2019. All priority non-conformities/deficiencies must be started within 3 months of the audit being completed.</p>

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>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.</p>	<p>5.5 All other non-conformities must have a basic CIP developed that is planned to resolution with responsibilities assigned and estimated timelines established for each action point. The CIP action points for all other non-conformities are expected to start upon completion of the CIP for the priority non-conformities.</p> <p>5.6 If a firm does not have any priority non-conformities, a detailed and specific CIP must be developed, approved and started by December 31, 2019. All non-conformities must be started within 6 months of the audit being completed.</p> <p>5.7 The detailed corrective action points, for each non-conformity must be planned to resolution with responsibilities assigned and expected timelines established for each action point.</p> <p>5.8 Senior Management must review and approve the documented CIP for all non-conformities. This review and approval is documented.</p> <p>5.9 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 documented.</p>

Example of a CIP being developed and started:

Non-conformity	Root Cause Analysis	Action Plan		Start Plan
Audit date: September 1, 2019 Audit Section 4.2 f	October 15, 2019	November 1, 2019		November 15, 2019
		Activity	Dates	
Worker observed setting-up Production Line A1 without locking-out equipment.	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.	1. Maintenance Supervisor to develop and train staff on interim lock-out procedure until equipment is redesigned. 2. Operations Manager to source and secure three contract bids to re-engineer faulty equipment. 3. Operations Manager and VP Operations to review and select successful contract bid. 4. VP Operations secures financing through budget process. 5. Contractor completes work. 6. H&S Manager evaluates for effectiveness.	November 15, 2019 December 1, 2019 January 1, 2020 March 30, 2020 July 31, 2020 August 31, 2020	1. Maintenance Supervisor documents interim lock-out procedure and training of all appropriate staff.

2019 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

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 2019 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 to the Safety Group Program Sponsor by March 29, 2019 with the 2019 Action Plan.

HSMS Auditor Training requirement:

The qualification standard is formal auditor 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 auditor 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 Groups 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 a firm’s progress on their 2019 Advantage Program Action Plan may be conducted by a WSIB Safety Groups Program Consultant 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 and WSIB Validation Audits:

All Advantage Program firms submit a 2019 Year-end Report Checklist, signed by Senior Management, by December 16, 2019 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 14, 2020 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 2, 2020.

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 2019 Advantage Program documents will not be accepted or reviewed by the WSIB following the March 2, 2020 deadline, including during the on-site validation audit.

1	A copy of the 2019 Written Company Standard for the HSMS Audit Program and 2019 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 2018 Audit and Continual Improvement Plan, or <i>Safety Group Evaluation and Making Improvements Plan. (Requirement #3)</i>	20%
4	A copy of the completed 2019 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 2019 Continual Improvement Plan addressing the 2018 Review deficiencies, and the 2019 HSMS Audit non-conformities. Documented evidence of Senior Management review and approval of the CIP (with date). The CIP must identify any priority non-conformities. The CIP is started in 2019. Also, any quarterly progress reviews by Senior Management. <i>(Requirement #5).</i>	20%

Safety Group Program Sponsors can require firms to submit all Advantage Program documentation before December 16, 2019 or before being notified of validation audit selection. Your Program Sponsor can confirm your specific reporting requirements and the due dates.

Maintenance of elements: Maintenance of past Safety Groups 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 Groups 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 Advantage Program 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 2019 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 the 2019 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 2018 Audit and Continual Improvement Plan (or 2018 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 2019 Advantage Program Requirements, and the company's written standard.
 - b. WSIB auditor may request to review the 2018 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 2019 CIP.

4. HSMS Audit: **20%**

- a. Approved HSMS Audit completed in 2019 following the 2019 Advantage Program 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 company 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 company auditor(s).
- f. Documented evidence of Senior Management review and acceptance, with date, of the completed 2019 HSMS Audit.

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

- a. All deficiencies identified by Advantage Program Requirement #3 and non-conformities identified by the 2019 HSMS Audit are addressed on a 2019 CIP following the 2019 Advantage Program Requirements and to the company's written standard.
- b. The 2019 CIP has identified all priority non-conformities (high-risk hazards, legal requirements, hazard recognition and assessment activities, and return to work activities) with detailed and specific corrective action points. The 2019 priority CIP is documented and started in 2019. Verifies all priority non-conformities have CIP corrective action points documented and started within 3 months of the audit being completed and are progressing based on the established timelines.
- c. Verifies non-priority non-conformities have a basic CIP developed that is planned to resolution with responsibilities assigned and estimated timelines established for each action point.
- d. Verifies if a firm does not have any priority non-conformities the CIP was started no later than December 31, 2019 and all non-conformities have been started within 6 months of the audit being completed.
- e. All non-conformities are planned to resolution with responsibilities assigned and timelines established.
- f. Documented evidence of Senior Management review of the 2019 CIP.
- g. 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 2019 program year. The 2019 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 2018 Advantage Program are expected to continue working on their 2018 Continual Improvement Plan until completed, or they have completed their 2019 HSMS Audit and developed an approved 2019 Continual Improvement Plan. The 2019 Continual Improvement Plan may need to carry forward unfinished action points from the 2018 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 2019 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 2019 HSMS Audit and develop and implement a 2019 Continual Improvement Plan to the 2019 Advantage Program Requirements, subject to verification by validation audit, to qualify for the 2019 rebate. A firm does not qualify for the rebate by completing only the written standard, auditor training, and 2018 HSMS Audit and CIP Review.
8. All the applicable Terms and Conditions of Participation on the 2019 Safety Group Application Form and Safety Groups Program Employer Guidelines – current edition, apply to Advantage Program participants.