



## EDMONTON POLICE SERVICE

### REPORT TO THE EDMONTON POLICE COMMISSION

DATE: 2019 Aug 27

SUBJECT: 2019 Occupational Health and Safety Audit

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#### RECOMMENDATION(S):

That the Edmonton Police Commission (EPC) receives this report as information.

#### INTRODUCTION:

This report will provide information, present recommendations for action or update the EPC on the completed 2019 Edmonton Police Service External Occupational Health and Safety (OHS) Audit. The EPS passed the occupational health and safety audit, scoring 85% overall.

The EPS participates in the Government of Alberta's Partnerships for Injury Reduction (PIR) program, which includes annual audits of our health and safety program to determine effectiveness. This information gathered in these audits assists in creating a safe work environment for EPS employees and contractors. Participation in the PIR program is a requirement of maintaining the EPS Certificate of Recognition (CoR), which allows us to receive rebates from the Workers Compensation Board.

#### BACKGROUND:

EPS undergoes an annual Occupational Health and Safety (OHS) audit, the purpose of which is to evaluate our OHS management system, identify strengths, and make recommendations for continued improvements. As a participant in the Government of Alberta's Partnerships for Injury Reduction (PIR) program, EPS must engage an external provider to conduct our audit every third year in order to maintain our Certificate of Recognition (CoR). Maintaining our CoR allows access to rebates through WCB, assists in ensuring that we are compliant with OHS legislation, and allows us to determine if we are meeting or exceeding industry best practices. EPS has achieved and maintained our CoR for the last nine years.

In June of 2018 the Government of Alberta implemented significant changes to the OHS legislation. In recognition of these changes, our PIR certifying body, the Alberta Municipal Health and Safety Association (AMHSA), undertook substantial modifications to the audit evaluation tool, including the addition of two new full elements to evaluate

the performance on Other Parties at the Worksite and Health and Safety Representatives.

The external OHS audit took place between April 23 and May 3, 2019. During that time period, five external auditors conducted observation tours and documentation reviews of 18 sites as well as 143 interviews.

### **COMMENTS / DISCUSSION:**

Auditors evaluated the documentation and performance over the last one year period. All elements of the EPS OHS program were measured and the audit has successfully passed the AMHSA Quality Control/Quality Assurance process.

EPS achieved an overall score of 85%. While this is slightly lower than previous years, this score is commendable given the momentous OHS changes in the latter half of 2018 and the addition of two new elements in the audit evaluation tool. By achieving an overall score over 80%, EPS has renewed our CoR through to May of 2022. The scoring of the individual elements can be found below.

<b>Element</b>	<b>Final Score %</b>
<b>Management Leadership &amp; Organizational Commitment</b>	<b>91</b>
<b>Hazard Identification and Assessment</b>	<b>88</b>
<b>Hazard Control</b>	<b>87</b>
<b>Health &amp; Safety Representatives</b> *new in 2019	<b>75</b>
<b>Qualification, Orientation and Training</b>	<b>96</b>
<b>Other Parties at the Work Site</b> *new in 2019	<b>67</b>
<b>Inspections</b>	<b>80</b>
<b>Emergency Response Planning</b>	<b>71</b>
<b>Incident Investigation</b>	<b>89</b>
<b>Program Administration</b>	<b>94</b>

The OHS section has developed an Audit Action Plan based on recommendations provided in 2019 Audit Report. The purpose of this plan is to address any gaps identified in the audit and continue to improve the overall EPS occupational health and safety management system. This plan will be shared with the Joint Workplace Health and Safety Committees and Health and Safety Representatives for their input and assistance in implementation.

### **CONCLUSION:**

The OHS section has developed an Audit Action Plan based on recommendations provided in 2019 Audit Report. The purpose of this plan is to address gaps identified in the audit and continue to improve the overall EPS occupational health and safety

management system. This plan will also be shared with the Joint Workplace Health and Safety Committees and Health and Safety Representatives for their communication and assistance in implementation.

**ADDITIONAL INFORMATION ATTACHED:**

1. Attachment 1 - 2019 OHS Audit Executive Report
2. Attachment 2- 2019 Draft Audit Action Plan

**Written By:** OHS Consultant, Nicole Wetsch, OHS Section

**Reviewed By:** Director Donna Munro, Employee & Org. Wellness Branch

**Reviewed By:** Executive Director Corrina Chetley-Irwin, Human Resources Division

**Approved By:** Chad Tawfik, Acting Deputy Chief, Corporate Services Bureau

**Chief of Police:** \_\_\_\_\_

**Date:** \_\_\_\_\_

# **City of Edmonton**

## **Edmonton Police Service**

### **2019 COR Recertification Audit**

#### **Certificate of Recognition Partnerships Audit Report**

**Last Day on Site: Friday, May 3, 2019**

**Certifying Partner: Alberta Municipal Health and Safety Association**

audit completed by:  
EHS Partnerships Ltd.  
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Edmonton, AB  
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## Executive Summary

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### Executive Summary

EHS Partnerships Ltd. (EHSP) was retained by the Edmonton Police Services (EPS) to conduct a Certificate of Recognition (COR) external audit on the Alberta Municipal Health and Safety Association (AMHSA) audit protocol. This audit was intended to evaluate the EPS's occupational health and safety management system (OHSMS). The auditors Jennifer McEnhill, Kim Connolley, Antonio Arguello, Jewel Day-Hampton, and Tyler Foley are certified to conduct external audits on behalf of the Alberta Municipal Health and Safety Association (AMHSA).

Overall, EPS was found to have an effective OHSMS with some opportunities for improvement. One key strength and one suggestion for improvement from each element in the audit document has been identified in this Executive Summary.

### **SUMMARY OF PROGRAM STRENGTHS AND SUGGESTIONS FOR IMPROVEMENT**

#### Element 1: Management Leadership and Organizational Commitment.

Management leadership and commitment is the essential foundation of a successful health and safety management system. Defined responsibilities and accountability at all levels of the organization are key components of a functional OHSMS.

##### **Key Strength**

During interviews, employees confirmed the ample resources are provided by EPS to implement and improve health and safety at all bureaus. Some examples provided include: sworn member on EPS OHS team to help facilitate audit activities, variety of training, uniforms (e.g., vests and utility belt), personal protective equipment (e.g., safety glasses, gloves, etc.), first aid equipment, AEDs, Naloxone kits for fentanyl overdoses; shooting practice; ergonomic workstations; gym with latest workout equipment, family assistance programs, etc. Providing adequate resources will assist EPS with ensuring employees conduct work activities in a safe manner and help with maintaining a safe workplace overall.

##### **Key Suggestion for Improvement**

During interviews, not all employees were able to explain how their health and safety performance is Evaluated at EPS. It is suggested a health and safety component be integrated with existing annual performance reviews to evaluate each employee's health and safety performance. Evaluating the personal health and safety of employees will enable them to identify their needs and develop a plan to meet these needs. For example: mental first aid, inspection training, reporting incidents, etc.

#### Element 2: Hazard Assessment

Hazard identification and assessment impacts all other elements of an OHSMS and forms the basis for determining the adequacy of controls, required frequencies of inspection, and training requirements. All equipment, machinery, work areas, and work processes need to be carefully evaluated. Fully realized hazard and risk assessments provide a strong indication of where vulnerabilities exist and where incidents have the potential to occur.

##### **Key Strength**

A review of completed EPS Hazard Identification and Control forms, noted that both health and safety hazards have been identified for the tasks associated with each of the jobs at EPS. Some examples include:

Civilian Member (Ballistics Analyst) - Safety hazards include: harassment, violence and assault, fire or explosion, etc. health hazards include air quality (indoor/outdoor, smoke, etc.).

Sworn Member ALERT - Safety hazards include: ergonomic hazards (heavy lifting, awkward/static



postures, workplace design, etc.), falls from height, etc. Health hazards include: noise exposure, psychological stress / PTSD, fatigue, and chemical exposure (asbestos, lead, gases, drugs, etc.), etc.

Identifying both health and safety hazards allows EPS to develop and implement the proper control measures to protect its employees and provide a safe environment.

#### Key Suggestion for Improvement

A review of completed EPS Hazard Assessment and Control forms, noted that these evaluate each task for risk as opposed to each hazard as is required by protocol guidelines. It is suggested the current Hazards Assessment and Control form be reviewed and revised to include the evaluation of each hazard identified. Evaluating each hazard will assist EPS with prioritizing addressing each hazards by developing and implementing the proper control measures.

#### Element 3: Hazard Control

An effective OHSMS needs to ensure that control measures are in place to eliminate or reduce the risk of harm to people, equipment, and the environment. Controls are intended to eliminate or reduce the risk to an acceptable level. Implementation of adequate and appropriate hazard controls will result in a reduction of workplace incidents. A hierarchy of controls should be considered where the first option is to eliminate the hazard and the last option would be to incorporate the use of Personal Protective Equipment to protect the worker from the hazard.

#### Key Strength

During interviews, employees were able to demonstrate their knowledge with regards to the use of established controls. Some examples provided include: pepper spray, work boots, duty belt, fire arm unloading stations, gas mask, safety glasses, high visibility vests, first aid training, using different techniques to mitigate aggressive situations (when gun or taser use is not an option), swipe card to access the building, ergonomic office equipment, using vent fans in drug exhibit rooms, etc. Communicating and providing training on control measures will enable employees with having a good understanding of these and allow them to implement as required to protect their safety.

#### Key Suggestion for Improvement

A review of the Violence and Safety Policy, noted to include 1/4 required criteria, as the policy was noted to not include the responsibility to investigate, commitment to maintain confidentiality of personal information and a statement that the policy is not intended to discourage workers from exercising their rights. It is suggested the policy be reviewed and revised to include all required criteria to ensure EPS' compliance with legislated requirements. Having a complete policy with all criteria will reduce the risks of workplace violence, and also ensure EPS is in compliance with legislated requirements.

#### Element 4: Joint Health and Safety Committee & Health and Safety Representatives

Joint Work Site Health and Safety Committees are a key element of the internal responsibility system. It brings work site parties together to work on topics such as hazard identification and control, investigation of health and safety incidents, and responding to reports of dangerous work. If the employer has 1-4 employees as determined through the audit scope, this element may be marked not applicable.

#### Key Strength

A review of committee meeting minutes, noted that Joint Work Site Health and Safety Committees (JWSHSC) have been established as per the terms of reference, where applicable. Establishing the JWSHSC will allow the committee to operate properly by having the required representation from both employer and workers and allow all divisions to be in compliance with the terms of reference and legislated requirements, where applicable.

#### Key Suggestion for Improvement

A review of employee training records and JWSHSC meeting minutes, noted that not all committee



members have been trained in their duties and responsibilities. It is suggested training be provided to all JWSHSC members as required. Providing training will enable JWSHSC members to have a better understanding of their roles and responsibilities, allow them to conduct their responsibilities in an effective manner, and ensure legislated JWSHSC training requirements have been met.

#### Element 5: Qualification, Orientation and Training

Qualifications, orientations, and training are essential to ensure employees are competent to perform their job tasks in a safe and healthy manner. Competency is defined as verifying that employees have the skills, knowledge, and ability to perform their jobs in a healthy and safe manner with minimal to no supervision.

##### Key Strength

A review of training records confirmed competency assessments are being conducted as identified by EPS. Completing competency assessments assist with ensuring employees have the necessary experience, qualification and training for safely conducting their work activities in a safe manner; and therefore, ensure their health and safety at the workplace.

##### Key Suggestion for Improvement

A review of employee training records, noted that not all employees have received job-specific training when they are a new employee, assigned new tasks, or when an operational change affects their work. It is suggested the current training system in place be reviewed and revised to ensure that all employees receive job-specific training as needed (e.g., new hire, assigned new tasks, or when operational changes affect their work) such as a tracking system to ensure employees receive training as required. Using a tracking system for job-specific training will assist EPS with ensuring employees are provided with training when they are a new hire, assigned new tasks, or when operational changes affects their work.

#### Element 6: Other Parties at or in the Vicinity of the Work Site

Other employers, and/or self-employed persons, visitors, and external work site parties must be included in the employer's health and safety management system.

##### Key Strength

A review of section 8.6 of EPS OHS program manual, confirmed there is a process in place to address non-compliance of other employers and/or self-employed persons at EPS. The Edmonton Police follow the same contractor management program as the City of Edmonton. Information about contractor management found on OneCity website (internal site). Having a system to hold everyone accountable, including other employers and/or self-employed persons, assists EPS with providing a health and safe environment by ensuring everyone meets its expectations.

##### Key Suggestion for Improvement

A review of both contractor and visitor sign-in logs noted that not all contractors and visitors have been provided with health and safety orientations upon entry to site. It is suggested health and safety orientations be provided to both contractors and visitors at each site by standardizing a process that covers all critical site-specific information (e.g., evacuation process, muster point, emergency personnel, etc.) consistently throughout all bureaus. Providing health and safety orientations to both contractors and visitors will enable them to properly execute the site-specific emergency response plan by communication critical information such as muster point, first aiders on site, etc.

#### Element 7: Ongoing Inspections

The formal inspection process can proactively identify new potential hazards, as well as confirm the effectiveness of controls already in place.

##### Key Strength





## Certificate of Recognition (COR)

Overall, during observations, it was noted most deficiencies identified through formal inspections have been corrected as required at all sites, where applicable. Addressing deficiencies identified through completed formal inspections assist with providing a safe workplace and with maintaining a positive safety culture at EPS.

### Key Suggestion for Improvement

A review of training records and completed inspections, noted that not all employees leading inspections have completed inspection training. It is suggested training be provided consistently to all those leading inspections by using a tracking system to identify those expected to conduct inspections. Providing training to employees will enable them to conduct inspections in an effective manner, identify deficiencies and ensure these are addressed accordingly.

### Element 8: Emergency Response

Effective health and safety systems cannot guarantee immunity from natural disaster or other emergency situation. However, a fully-realized emergency response plan provides a level of assurance that appropriate and efficient actions can take place in the event of an emergency or disaster. When requisite training is provided, employee response can be effective and appropriate, potentially minimizing the loss of life, injury, and production.

### Key Strength

A review of completed emergency response plan (ERP) drill records (Annual All Hazard Training for Affected Personnel) noted that most sites have completed mock drills as required. Completing drills as per EPS' policy enables each site to test the effectiveness of its ERP by identifying and addressing identified deficiencies.

### Key Suggestion for Improvement

A review of Facility Emergency Response Plans (FERP), noted that specific plans developed for the facilities appeared to only address fire evacuations. It is suggested site specific FERPs be reviewed and revised to include site-specific potential emergencies (e.g., gas leak power outage, active shooter, explosion, etc.). Identifying and including potential emergencies in FERPs will enable each site to take the necessary measures to properly prepare in the event of an actual emergency.

### Element 9: Incident Investigation

When an incident or near miss occurs, it is important to investigate and identify the causes or contributing factors. An effective and thorough investigation allows for measures to be put in place to prevent the same or similar occurrences from happening again.

### Key Strength

During observations, it was noted that the identified corrective actions in completed incident investigations have been implemented to prevent recurrence. Some examples include: Gym equipment had additional weight added for counterbalance; Frayed electrical cord from the pedestal in the parking lot had been de-energized; Ergonomic assessment for offices, etc. Developing and implementing control measures as a result of an incident, assists with preventing the recurrence of a similar incident and ensures proper measures have been taken to protect the safety of workers.

### Key Suggestion for Improvement

During interviews, it was noted that not all employees were able to confirm how investigation results are communicated to them. It is suggested communication of investigation results be increased using a variety of methods such as parades, EPS net, office meetings, bureau/division wide emails, safety bulletin boards, etc. Using a variety of communication methods will ensure employees are made aware of incident investigation results and receive the necessary information to protect them from experiencing a similar incident, where applicable.



Element 10: System Administration

Record keeping plays a critical part in monitoring the effectiveness of the OHSMS. Ongoing health and safety communication helps to ensure that employees are aware of and understand the programs in place. Review of the system on a periodic basis is an important part of the Plan-Do-Check-Act cycle.

**Key Strength**

During interviews, most employees confirmed that health and safety information is readily available to them at EPS. Some examples provided include: EPS intranet; safety bulletin board; service directives; parades; Learning Management System (LMS); etc. Using a variety of methods for making health and safety information available to employees will enable them to conduct work activities in a safe manner by utilizing the resources provided by EPS.

**Key Suggestion for Improvement**

During interviews, it was noted that not all employees were able to describe how previous occupational health and safety management system (OHSMS) evaluations, or action plans are communicated to them. It is suggested previous OHSMS evaluations and action plans be communicated to employees with the use of several communication methods such as parade, EPS net, office meetings, safety bulletin boards, JWSHSC meeting minutes, etc. Using a variety of methods for communicating the previous OHSMS and action plan will ensure employees are made aware of these, and also demonstrate EPS' commitment towards the implementation and improvement of its safety program.

**CLOSURE**

We would like to thank the Edmonton Police Services (EPS) for their assistance during the audit process. We would also like to thank all EPS employees for their assistance and cooperation they provided in completing this evaluation. Review of the completed report will provide justification for the scoring. Developing and implementation of an action plan from this report will ensure the EPS' Occupational Health and Safety Management System (OHSMS) continues to improve which will assist in strengthening the overall safety culture at EPS.

Sincerely,  
Jennifer McEnhill  
Dated: May 24, 2019

# EPS Occupational Health and Safety Audit Action Plan **2019**

Finding Details	Action Details	Assigned To
The audit found that during interviews, not all employees were able to demonstrate their knowledge with regards to Edmonton Police Services' (EPS) OHS Policy Contents, their individual OHS rights and their legislated health and safety responsibilities.	Develop and implement mandatory online Basic Core OHS training	Jason Theodore
During interviews, not all employees were able to confirm how their health and safety performance is evaluated at EPS.	Assess the feasibility of incorporating OHS performance into the EPDP.	Andy Simpson
A review of EPS' current library of hazard assessments was found to evaluate each task for risk as opposed to each hazard as is required by protocol guidelines. It is suggested hazard assessments be reviewed and revised to evaluate each hazard.	Consult with AHMSA to find out what other large employers are doing this to meet this standard, determine the feasibility of changing our current process and make a recommendation whether or not to proceed with changes.	Nicole Wetsch
A review of EPS OHS manual noted that a process is not in place for conducting site-specific hazard assessment when a new activity has been temporarily introduced. It is suggested a clause be added to the OHS manual explaining EPS's definition of site-specific hazard assessments and provide guideline of what EPS would consider a site-specific hazard assessment.	Inventory area where site specific assessments are feasible and necessary. Work with the areas to develop a form specific to site specific hazard assessments and update the program manual to reflect the changes.	Nicole Wetsch
Review of CO1PO (Violence and Safety Policy), noted that the policy does not include all of the requirements laid out in the new legislation. It is suggested the violence prevention procedure be reviewed and revised to ensure legislated compliance.	Update the Violence Prevention policy, procedure and training to reflect the changes in legislation and communicate it to the membership.	Jason Theodore
During interviews, not all employees were able to explain EPS' Harassment Prevention Plan in general terms. It is suggested a variety of methods be used to train employees on EPS' harassment prevention plan.	Update Harassment training and communicate the new training to the membership.	Erin Prenoslo



## EPS Occupational Health and Safety Audit Action Plan **2019**

A review of the Violence and Harassment Policies and Procedures, noted that these have not been reviewed as required by legislation. It is suggested a process be developed to ensure the violence and harassment policies be reviewed when required, including when either an incident of harassment and/or violence occurs.	Create internal process to ensure harassment policy and procedure is reviewed/updated at least every 3 years, or as required based on incidents.	Erin Prenoslo
A review of the EPS Joint Work Site Health and Safety Committee (JWHSC) Terms of Reference, noted that 7/8 duties have been outlined for the Joint Work Site Health and Safety Committee and Health and Safety Representative, as the document does not specify the requirement to improve the health and safety management system.	Update the Terms or Reference for JWHSC	Jason Theodore
A review of training records noted that not all JWHSC members have been trained in their duties and responsibilities at EPS.	A briefing note was submitted to address the funding requirements for training committee members	Andy Simpson
A review of visitor sign-in logs, noted that health and safety orientations are not being provided at all EPS sites. It is suggested refresher training be provided to the individuals assigned the task to complete health and safety orientations to visitors upon arriving to an EPS site.	Consult with AHMSA to determine what meets the definition of a visitor in terms of the EPS and clarify when orientations are required. Update the manual to reflect this and indicate that Inspectors are responsible for ensuring this is completed in their areas of responsibility.	Nicole Wetsch
A review of training records noted that not all individuals leading formal inspections have received training. It is suggested training on investigation techniques be provided consistently throughout EPS locations.	This will be covered in one of the modules being developed for the new version of Leadership for Safety Excellence training	Jason Theodore
A review of completed inspections noted that these have not all been completed by managers and supervisors as per the policy. It is suggested a inspection schedule be developed and implemented including assigning employees from different levels at EPS.	Communication on inspections requirements and processes will be increased through the OHS communications plan and involve the JWHSC to promote the message in their areas.	Nicole Wetsch

Items in green have been completed

## EPS Occupational Health and Safety Audit Action Plan 2019

<p>A review of Facility Emergency Response Plans (FERPS) at each location sampled, noted that some of these did not identify potential emergency scenarios, communication systems were not always confirmed and emergency response personnel information was not included in all cases. It is suggested current FERPs be reviewed and revised to identify potential emergency scenarios for the specific EPS location.</p>	<p>A gap analysis of the emergency response plan will be completed and a briefing note submitted through the chain of command with recommendations as to how to bring plans into compliance.</p>	<p>Jason Theodore</p>
<p>During observations, it was noted that some first aid kits/supplies were expired at some EPS locations. It is suggested EPS ensure first aid kit contents / supplies be inspected on a regular basis to avoid these from having expired supplies (Antiseptic wipes).</p>	<p>OHN's will conduct and audit of facility first aid kits in order to eliminate excess kits, create and inventory of supported kits and determine a process for monthly checks and replenishment.</p>	<p>Si Liew and Gina Liao</p>





# 2019 Occupational Health & Safety Audit Results

Presenter: Nicole Wetsch, OHS Consultant



# Presentation Overview

- **Certificate of Recognition (CoR)  
Program Requirements**
- **Occupational Health & Safety (OHS)  
Audit Purpose**
- **2019 External OHS Audit Results**





# Certificate of Recognition (CoR)

- **Recognition by Alberta Government and the Workers' Compensation Board (WCB) for Occupational Health & Safety Management System implementation**
- **Must participate in and pass annual audit to maintain CoR**
- **EPS achieved and has maintained CoR for the last 9 years**



# Certificate of Recognition Benefits

- **A strong health and safety management system leads to a reduction in injuries**
- **Decreased WCB Premiums by participating in the Government of Alberta Partnerships in Injury Reduction Program (PIR)**





# Purpose of the OHS Audit

- **An Occupational Health & Safety (OHS) Audit evaluates the existing OHS Program to determine if it meets provincial standards**
  - **OHS Audit required every year**
  - **External OHS Audit required every third year**
- **Measures the EPS OHS Program to identify strengths and recommendations**
- **Strengthens the existing OHS Program through the development of an Audit Action Plan based on auditor recommendations**



# Audit Scoring

- **Must achieve a minimum 80% Overall Score to pass the audit**
- **Must achieve a minimum 50% score in each element**
- **Scoring based on documentation review, interviews, and auditor observations**
- **This audit cycle used a new protocol with significant changes**





# **2019 OHS Audit Results**

## **Passed**

- **EPS received a score of 85%**

### **Highest overall score to date**

- **2018 EPS Internal Audit Result was 93%**
- **2017 EPS Internal Audit Result was 90%**
- **2016 EPS External Audit Results was 92%**
- **2015 EPS Internal Audit Result was 91%**



# Audit Score 85%

Element	Final Score %
Management Leadership & Organizational Commitment	91
Hazard Identification and Assessment	88
Hazard Control	87
Health & Safety Representatives	75
Qualification, Orientation and Training	96
Other Parties at the Work Site	67
Inspections	80
Emergency Response Planning	71
Incident Investigation	89
Program Administration	94





# **Audit Findings (General)**

## **Overall Strengths**

- **High level of awareness of health and safety responsibilities within all levels of EPS members**
- **Extensive training provided for sworn members on an on-going basis and the OHS Orientation process for all EPS members covers essential health and safety information**
- **Health and safety hazards are well identified, with control measures that are adequate, appropriate and understood by employees.**



# **Audit Findings (General)**

## **Suggestions for Improvement**

**An Audit Action Plan was developed to include strategies on how to:**

- **Increase employee engagement and understanding of roles and responsibilities at all levels**
- **Ensure that our policies, procedures and training remain compliant with best practices and the extensive legislative changes that have occurred.**





# Next Steps

- **Implementation of an Action Plan commencing in the Fall of 2019 to address the audit findings**
- **Utilize EPS Joint Worksite Health and Safety Committees to support the OHS program implementation**



# QUESTIONS?