



EDMONTON POLICE SERVICE

REPORT TO THE EDMONTON POLICE COMMISSION

DATE: 2020 September 23

SUBJECT: 2020 Internal Occupational Health and Safety Audit

RECOMMENDATION(S):

That the Edmonton Police Commission (EPC) approve the following recommendation(s):

1. Approve the attached 2020 OHS Audit Action Plan

INTRODUCTION:

This report will provide information, present recommendations for action or update the EPC on the completed 2020 Edmonton Police Service internal Occupational Health and Safety (OHS) Audit. The EPS passed the occupational health and safety audit, scoring 90% 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. The 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 perform internal audits twice during the 3 year cycle, and on the third year engage an external provider to conduct our audit 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 ten years.

As we had our external OHS audit in 2019, the 2020 OHS audit was conducted internally. This year due to COVID 19 our PIR certifying body the Alberta Municipal Health and Safety Association changed the audit tool to documentation only.

COMMENTS / DISCUSSION:

The internal OHS audit took place between June 16 and August 11, 2020. During that time period, five internal auditors conducted the documentation reviews on 14 sites.

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 90%. While this is higher than previous years, it is important to note that this year's audit was a document only audit and therefore were unable to conduct employee interviews or site observations. By achieving an overall score over 90%, EPS continues to maintain our CoR through to May of 2022. The changes to the audit protocol which required a document only audit this year did have an effect on the overall scoring, as it was missing additional interview and observation verification methods. These changes were evident in the Hazard Control, Other Parties at the Worksite, and Emergency Response Planning audit elements, as we were unable to conduct additional verification through observations and interviews. The scoring of the individual elements can be found below.

Audit Element	Final Score %
Management Leadership & Organizational Commitment	100
Hazard Identification and Assessment	100
Hazard Control	75
Health & Safety Representatives	98
Qualification, Orientation and Training	93
Other Parties at the Work Site	63
Inspections	93
Emergency Response Planning	78
Incident Investigation	98
Program Administration	93

The OHS section has developed an Audit Action Plan based on recommendations provided in 2020 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 2020 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 - 2020 EPS OHS Audit Executive Report
2. Attachment 2 - 2020 EPS OHS Audit Action Plan


Written By: Jason Theodore, Human Resources Division

Reviewed By: Nicole Wetsch, A/Manager OHS Section 

Reviewed By: Donna Munro, Human Resources Division 

Reviewed By: Executive Director Darren Eastcott, Human Resources Division 

Approved By: Darren Derko, Deputy Chief, Corporate Services Bureau 

Chief of Police:  *ADD OHS to present @ EPC. Please prepare a short PPT.*

Date: Oct 6, 20

*2 scores being average
downward shift to
know more*

Executive Summary

Alberta Municipal Health and Safety Association

Standard: Partnerships 2018 - DOCUMENTATION ONLY Version
Tool Version: 1.01.06

Audit Type: Qualification & Maintenance - DOCUMENTATION ONLY

Organization: City of Edmonton, Edmonton Police Service

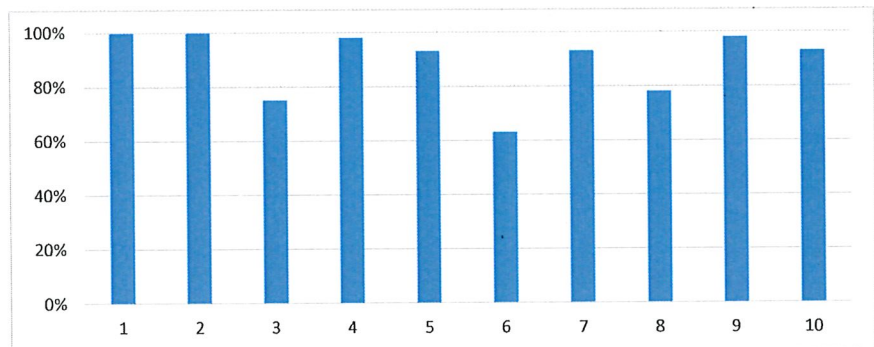
WCB Account: 5637929
Industry Code: 95104 (Cities)

Employees: 2710
Interviewed:
Total Sites: 30
Sites Visited:

Lead Auditor: Jason Theodore
Email: jason.theodore@edmontonpolice.ca

Start Date: July 16, 2020
End Date: August 11, 2020
Submitted: August 12, 2020

Element 1	25/25 (100%)
Element 2	95/95 (100%)
Element 3	49/65 (75%)
Element 4	54/55 (98%)
Element 5	37/40 (93%)
Element 6	25/40 (63%)
Element 7	37/40 (93%)
Element 8	31/40 (78%)
Element 9	49/50 (98%)
Element 10	28/30 (93%)
Overall	430/480 (90%)



Pass - Audit meets scoring requirements.

Contact Information

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Certification: 2020-01-16
Organization: Edmonton Police Service
Phone: 780-421-2050
Email: jason.theodore@edmontonpolice.ca

Lead Auditor Code of Ethics and Participation

Yes, I have read, understood, and agree to abide by the Code of Ethics and Disclaimer Statement.

Yes, I have participated in all aspects of the audit.

Audit Team: Andy Simpson, Mark Parr, Si Liew, Simba Mataruse

CP: Alberta Municipal Health and Safety Association
Contact: Shannon Thomas
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Executive Summary

Note: Due to differences in scoring calculation, percentages noted in text may not be reflected in the final score.

Employer Profile / Type of Operation *The Edmonton Police Service provides 24-hour policing to protect and provide for a safe environment for the citizens of Edmonton to live in. The Edmonton Police Service is comprised of 6 bureaus plus the Office of the Chief which are: Corporate Services, Innovation and Information, Operation Support Services, Community Policing, Community Safety and Well Being, and Investigations Bureau. The Edmonton Police Commission acts as the civilian oversight body, responsible for ensuring that EPS provides effective and efficient policing to the citizens of Edmonton.*

Element 1 **Management Leadership and Organizational Commitment 25/25 (100%)**
Management commitment and leadership is the essential foundation for a successful occupational health and safety management system (OHSMS). Management and employees working cooperatively together is required for a health and safety system to succeed.

1.05 *(Strength) The EPS has well written detailed health and safety responsibilities for all employee levels within the organization. The health and safety responsibilities are written into the OHS Program Manual, the EPS Policies and Procedures, and Job Descriptions. This ensures consistent application of health and safety management system across the EPS.*

1.12 *(SFI) Although management does participate in meetings where health and safety is discussed, it is suggested that health and safety be a standing agenda item on all meeting agendas. In doing so this would ensure health and safety continues to be promoted by organizational leadership.*

Comment *Overall the EPS demonstrates a strong commitment to health and safety from their management and leadership teams.*

Element 2 **Hazard Assessment 95/95 (100%)**
A formal hazard assessment takes a close look at the overall operations of an organization to identify hazards, measure risk (to help prioritize hazards), and develop, implement and monitor related controls. Worker jobs or types of work are broken down into separate tasks. Formal hazard assessments are detailed, can involve many people, and will require time to complete.

A site-specific hazard assessment (also called field-level) is performed before work starts at a site and at a site where conditions change or when non-routine work is added. This flags hazards identified at the location (e.g., overhead powerlines, poor lighting, wet surfaces, extreme temperatures, the presence of wildlife), or introduced by a change at the work site (e.g., scaffolding, unfamiliar chemicals, introduction of new equipment). Any hazards identified are to be eliminated or controlled right away, before work begins or continues.

2.08 *(SFI) Although a majority of persons leading hazard assessments are trained to lead formal hazard assessments, it is suggested that when supervisors are assigning someone to lead the hazard assessment they confirm that the person assigned to lead the assessment is trained. By ensuring persons leading hazard assessments are trained it ensures consistency in the application of the hazard assessment process across the EPS.*

2.12 *(Strength) The site specific hazard assessments documented by the EPS members using forms such as the, Tactical Mission Plans, Covert Operational Security Plans, and SOPs, are good tools for effectively identifying potential hazards and controls to minimize risks to members in the performance of their duties.*

Comment *The EPS has a robust hazard assessment process which is well implemented throughout the organization.*

Element 3 **Hazard Control 49/65 (75%)**

If an identified hazard cannot be eliminated, controls are implemented to reduce the risk of the hazard. Implementation of hazard controls will result in the reduction of incidents. Three methods of control are: Engineering (i.e., elimination, substitution, guards, ventilation, sound barriers, etc.); Administrative (i.e., safe work practices, job procedures, job rotation, training, etc.); Personal Protective Equipment (i.e., eye protection, hearing protection, gloves, fire retardant coveralls, etc.).

3.01 *(Strength) The EPS has a well laid out hazard assessment form which are completed for each of the 68 different job categories. Each hazard has effective controls (engineering, administrative, and PPE) identified on the form, for members to review to ensure risks for members are reduced to acceptable levels for all required tasks.*

3.09 *(SFI) EPS has a good detailed process for documenting preventative maintenance activities for equipment used by members and its facilities. However, it is suggested that additional personnel be trained in the ability to produce maintenance reports, thereby ensuring a contingency plan is in place in the event the primary person responsible is away or unable to pull data due to operational pressures.*

3.11 *(SFI) As a policing organization the EPS has adequately trained and suitably equipped members who are able to appropriately respond to potential workplace violence. EPS is encouraged to implement the workplace violence training and updated policy, as this will assist in increasing employee awareness to workplace violence and measures on how to mitigate the risk.*

3.12 *(SFI) As per question 3.11 EPS is encouraged to implement the workplace violence training which will enable them to release the updated procedure. Implementing the updated workplace violence procedure will ensure employees are able to recognize workplace violence and effective measures on how to mitigate the risk.*

Comment *It was evident through the review of the hazard assessment and control process that EPS has a well documented process in place with appropriate hazard controls selected based on risk.*

Element 4 **Joint Work Site Health and Safety Committees and Health and Safety Representatives 54/55 (98%)**

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.

4.03 *(Strength) The committees have been functioning well at EPS and have been fully established as required by the Terms of Reference and legislated requirements. A strong committee presence within a worksite helps to establish a strong culture of safety and ensures employee ownership of the Health and Safety program.*

4.06 *(SFI) It is suggested that a review of committee members and health and safety representative training records be conducted to identify which persons still required HS Committee/HSR training. Once this is completed training should be scheduled when it becomes available again. Ensuring all JWSHSC members and HSR's are trained in their duties and responsibilities increases the effectiveness and consistency of the committees and representatives across EPS.*

4.12 *(SFI) It is suggested that when issues are not able to be resolved in a timely manner, the current method of tracking action items be reviewed to ensure that actions are diary dated and assigned to the appropriate persons with proper authority to ensure the action is addressed. Ensuring health and safety concerns are resolved in a timely manner increases the safety of all employees and strengthens the safety culture within the organization.*

Comment *EPS has firmly established committees and Health and Safety representatives as required. Meeting minutes confirmed that committees are fully engaged and actively promoting health and safety and addressing concerns.*

Element 5 **Qualifications, Orientation, and Training 37/40 (93%)**

Qualifications, orientations, and training are essential to ensure employees perform their job tasks in a safe and healthy manner. An employer is responsible to ensure the employee is competent.

5.01 *(Strength) The EPS has an extensive process in place that ensures employees are adequately qualified for the position they are being considered for, which assists in creating a safe and effective work environment for all employees within EPS.*

5.05 *(SFI) Ensuring employees are trained in items specific to their job is a key component to ongoing health and safety performance and risk reduction. It is suggested that supervisors regularly review training documentation to ensure employees are meeting EPS training requirements.*

5.08 *(SFI) Competency assessments are a key component in ensuring employees are adequately qualified, suitably trained and have sufficient experience to perform their job safely. Assessing competency of all positions in EPS ensures employees are provided a foundation to perform their job in a safe and effective manner.*

Comment *The EPS hiring and onboarding process ensures that new employees possess the appropriate qualifications and receive adequate orientation to their new roles. The ongoing training programs provides continued support to maintain competency in employees roles throughout their career with EPS.*

Element 6 Other Parties at or in the Vicinity of the Work Site 25/40 (63%)

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

6.01 *(Strength) The EPS has a well documented process outlined in the OHS Program manual and EPS Policy and Procedure. The process has clear defined roles and responsibilities for ensuring the protection of other persons not under the direction of EPS that are at or near our worksites.*

6.04 *(SFI) A review of contractor orientations and sign in logs identified that not all areas were conducting orientations as required. Messaging and/or training to employees responsible to ensure that this task is being completed would assist in ensuring that they understand their role. Ensuring contractors and visitors receive an orientation increases work place safety and risk reduction for all parties involved.*

Comment *The EPS contractor management process ensures that contractors working in EPS facilities meets minimum safety standards developed by the City of Edmonton. The EPS contractor and visitor process ensures that persons visiting EPS facilities are escorted by an EPS employee who is familiar with emergency response procedures.*

Element 7 Inspections 37/40 (93%)

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

7.01 *(Strength) The EPS formal inspection process clearly outlines the inspection process. Inspection frequency is based on operational risk (Low, Medium, and high) which is similar to the hazard identification and control process, making it easy for employees to connect it to the hazard assessment process. A good formal inspection process assists in reducing health and safety risks for all employees.*

7.03 *(SFI) Ensuring that employees who are leading formal inspections are trained is important as it provides them with a good understanding of the inspection process, and links it to hazard identification and control. Training employees leading formal inspections also improves consistency in the inspection process across the organization.*

7.04 *(SFI) A majority of the inspections completed were conducted as outlined by the OHS Program Manual Element 4, however it is suggested that some messaging or training be provided to supervisors and managers to reinforce the formal inspection process requirements. Training supervisors and managers in the formal inspection process, ensures consistent application and increases the effectiveness of the HSMS.*

Comment *It was evident during the audit the EPS has developed a comprehensive workplace inspection program based on risk. The JWSHSC members were actively involved in the completion of inspections, contributing to improved safety and health at EPS facilities.*

Element 8 **Emergency Response 31/40 (78%)**

An emergency response plan helps ensure appropriate and efficient actions will take place in the event of an emergency or disaster.

8.01 *(SFI) The EPS has identified in its General Procedures Plan 17 potential emergencies that could occur, for example: Tornado, Fire, Flood etc.. However, the site specific "Facility Emergency Response Plans" generally only address fire, medical and bomb threats. It is important that each facility has the potential emergencies identified based on the site to ensure the response is specific and clear for the employees working there. It is suggested that a review of the potential emergencies be undertaken for each EPS facility and the FERPs be updated based on that review.*

8.02 *(SFI) It is suggested that the FERPs be updated to include:
- Information on how emergencies will be communicated to employees including emergency communication systems (Alarms, blow horns etc..), and procedures for contacting both internal and external emergency contacts.
It is suggested that the FERPs be reviewed and updated to ensure that all identified roles have documented responsibilities.*

8.06 *(Strength) Although COVID-19 required changes to the current emergency drills (review of roles and responsibilities in lieu of drill), it was clear the process is effective as there is evidence that shows that deficiencies were identified and corrected. The identification of deficiencies through drills or other exercises ensure continued improvement and increased safety for all employees.*

Comment *EPS is well equipped to deal with emergencies due to the nature of their business. A well documented focused approach which addresses site specific emergencies for each facility will strengthen the overall response in the event of an emergency.*

Element 9 **Incident Investigation 49/50 (98%)**

Investigations determine the cause(s) of an incident, and the corrective action(s) required to prevent a recurrence.

9.03 *(Strength) A review of incidents confirmed that workplace injuries and illnesses are being reported, and suggests that employees are not afraid of reprisal if they tell their supervisor they were injured. The reporting of workplace injuries and illnesses assists EPS in identifying root cause and ways to prevent further recurrence, thereby improving the health and safety for all employees.*

9.09 *(SFI) A review of incident investigation determined that root cause, and corrective actions are identified in most incident investigations. The incident reporting system does not allow for the submission of an incident to the inspector without a root cause and a preventative action identified. It is suggested that increased messaging regarding the completion of incidents in a timely manner.*

9.1 *(Strength) A review of incident investigation reports for sites sampled identified that corrective actions are being implemented to prevent recurrence of the incident. Implementation of corrective actions prevents recurrence, and improves safety for all employees.*

Comment *The EPS has strong culture of reporting incidents and near misses at all levels of the organization. The majority incidents are reported and investigated in a timely manner with appropriate root causes and corrective actions identified. Incident investigations are analyzed for trending purposes which contributes to continuous improvement of OHS Programs and training.*

Element 10 **System Administration 28/30 (93%)**

System administration provides an evaluation of the overall effectiveness of the occupational health and safety management system (OHSMS).

10.03 *(Strength) The EPS creates quarterly OHS statistics reports and posts them for all employees to see. The reports provide employees a good overview on current OHS trends that are occurring in the organization.*

10.08 *(SFI) Although a review of the OHS Action plan identified that only 8 out of 10 action items were completed in accordance with the identified diary dates due to operational requirements. It is recommended that EPS consider operational demands including resource availability and external pressures such as the pandemic in the development of future action plans and diary dates.*

Comment *The OHS program at EPS is well integrated into its operations, and the organization is focused on continuous improvement through regular evaluations. Continued evaluation and improvement is important as it allows the EPS respond to the constant changing conditions in a policing environment.*

Conclusion *It was evident to the auditors that the Edmonton Police Service has a strong commitment to health and safety. The documentation provided to the auditors for review was organized and showed that the OHS Program is well implemented at EPS. While the audit report assessed the overall documentation requirements of the OHS program, it is important that ongoing review and evaluation occur of the program by all levels of the organization to ensure continuous improvement to programs and the health and safety culture. The continued focus on health and safety within EPS will ensure the organization maintains its position as a leader in policing. The auditors would like to thank the employees who assisted in gathering the documentation for the audit and are grateful for the support they received at the audit locations. Should there be any questions the auditors would be pleased to discuss findings.*

*Jason Theodore
Lead Auditor*

2020 EPS OHS Audit Action Plan

Suggestion for Improvement	Action Required	Area Responsible	Person Assigned To	Due Date	Status	Audit Score
Although a majority of persons leading hazard assessments are trained to lead formal hazard assessments, it is suggested that when supervisors are assigning someone to lead the hazard assessment, they confirm that the person assigned to lead the assessment is trained. By ensuring persons leading hazard assessments are trained it ensures consistency in the application of the hazard assessment process across the EPS.	Develop training for employees who are responsible for leading formal hazard assessments as part of the OHS Leadership in Policing training program that is already being developed.	OHS Section	Jason Theodore / Mark Parr	2021-04-30	In Progress	5/5
EPS has a good detailed process for documenting preventative maintenance activities for equipment used by members and its facilities. However, it is suggested that additional personnel be trained in the ability to produce maintenance reports, thereby ensuring a contingency plan is in place in the event the primary person responsible is away or unable to pull data due to operational pressures.	Firearms training unit to ensure additional members are trained in the maintenance report process.	Firearms Training Unit	Insp. Trevor Hermanutz	2021-04-30	Not Started	4/5

2020 EPS OHS Audit Action Plan

Suggestion for Improvement	Action Required	Area Responsible	Person Assigned To	Due Date	Status	Audit Score
As a policing organization the EPS has adequately trained and suitably equipped members who are able to appropriately respond to potential workplace violence. EPS is encouraged to implement the workplace violence training and updated policy and procedure as this will assist in increasing employee awareness to workplace violence and measures on how to mitigate the risk.	OHS Section to work with the Continuing Education Unit to develop workplace violence training specific to the updated policy and procedure. Once completed the policy, procedure and training to be rolled out to all EPS Employees.	OHS Section and Continuing Education Unit	Jason Theodore	2021-04-30	In Progress	0/5
It is suggested that a review of committee members and health and safety representative training records be conducted to identify which persons still required HS Committee/HSR training. Once this is completed training should be scheduled when it becomes available again. Ensuring all JWSHSC members and HSR's are trained in their duties and responsibilities increases the effectiveness and consistency of the committees and representatives across EPS.	The legislative requirement's for JWSHSC Committee requirements has been recently changed, EPS is doing a review of the organizational structure of the committees, and training will be updated and provided once the new committee structure is in place and new members have been established.	OHS Section	Simba Mataruse / Mark Parr	2021-04-30	In Progress	9/10

2020 EPS OHS Audit Action Plan

Suggestion for Improvement	Action Required	Area Responsible	Person Assigned To	Due Date	Status	Audit Score
A review of contractor orientations and sign in logs identified that not all areas were conducting orientations as required. Messaging and/or training to employees responsible to ensure that this task is being completed would assist in ensuring that they understand their role. Ensuring contractors and visitors receive an orientation increases work place safety and risk reduction for all parties involved.	OHS section to provide messaging to the divisions on the requirement to provide contractor orientations.	OHS Section	Nicole Wetsch	2021-04-30	Not Started	0/15
Ensuring that managers, supervisors, and employees who are leading or responsible for the completion of formal inspections have an understanding of the inspection process as outlined in OHS Program Manual element 4, and links it to hazard identification and control. Training employees leading formal inspections also improves consistency in the inspection process across the organization.	Develop training for leadership and employees who are responsible for leading formal inspections as part of the OHS Leadership in Policing training program that is already being developed. In addition to the training, EPS OHS section is implementing MyCority which will be utilized to schedule and track inspection completion providing more oversight that the process is being followed.	OHS Section	Jason Theodore / Mark Parr (Training) Nicole Wetsch (MyCority)	2021-04-30	Not Started	9/10

2020 EPS OHS Audit Action Plan

Suggestion for Improvement	Action Required	Area Responsible	Person Assigned To	Due Date	Status	Audit Score
The EPS has identified in its General Procedures Plan 17 potential emergencies that could occur, for example: Tornado, Fire, Flood etc. However, the site specific "Facility Emergency Response Plans" generally only address fire, medical and bomb threats. It is suggested that a review of the General Procedures Plan and Facility Emergency Response Plans take place to ensure all potential emergencies are identified for each facility, including the appropriate emergency response, and how emergencies will be communicated to employees.	Review the General Procedures Plan and the associated potential emergencies and update the Facility Emergency Response plans to identify site specific potential emergencies and the response.	DEOPS	S/Sgt Bill Krull / Katja Magarin	2021-04-30	Not Started	5/10
A review of incident investigation determined that root cause, and corrective actions are identified in most incident investigations. The incident reporting system does not allow for the submission of an incident to the inspector without a root cause and a preventative action identified. It is suggested that increased messaging regarding the completion of incidents in a timely manner.	Develop training for employees who are conducting investigations as part of the OHS Leadership in Policing training program that is already being developed. In addition to the development of training, EPS is implementing MyCority, which will provide supervisors, managers, and senior managers increased visibility and accountability over OHS inspections that occur within their bureau, division, section and unit.	OHS Section	Jason Theodore / Mark Parr (Training) Nicole Wetsch (Cority)	2021-04-30	Not Started	9/10