


<b>TAKLA NATION OHS Management System</b>	<i>Document Title:</i> <b>OHS Performance Management</b>		
<i>Document Owner (Position):</i> <b>HR Manager</b>	<i>Document Level:</i> <b>Policy</b>	<i>Reference No.:</i> <b>SAF-POL-003</b>	

## **OHS Performance Management Policy**

### **1.0 PURPOSE**

Takla Nation will consistently monitor its current performance and culture related to health and safety in the workplace. Areas for improvement shall be identified and reviewed, and actions to remediate shall be documented.

### **2.0 SCOPE**

All Organization work areas, and work activities, shall be monitored and reviewed for compliance to OHS Policies.

### **3.0 RESPONSIBILITY**

Every employee is responsible for identifying and acting on opportunities for continuous improvement in the Health and Safety program.

- a. Top Management shall ensure that performance expectations and policies related to Health and Safety are established, reviewed and reported on a regular basis.
- b. Department Managers are responsible to ensure that performance expectations related to Health and Safety are communicated to all employees under their jurisdiction.
  - They shall ensure that performance is measured and evaluated on a regular basis.
  - The status of Health and Safety performance shall be reported to top management on a prescribed schedule.
  - Processes for continuous improvement are implemented
- c. Supervision are responsible to implement Organization policies for Health and Safety and report the status of performance as required. They shall ensure that all employees under their jurisdiction are informed and trained accordingly.
- d. Workers shall understand and comply with the performance requirements and assist in the communication and improvement of the Health and Safety program.

### **4.0 RELATED DOCUMENTATION**


SAF-POL-001 Leadership & Commitment

### **5.0 OHS INSPECTIONS**

The Organization shall maintain a comprehensive program of OHS inspections including all facilities, equipment and job sites. Observations will be documented and corrective actions will be monitored and tracked for completion.

#### **5.1 Informal Facility and Work Inspections**

- Informal inspections will be conducted by direct supervisors on a daily basis in their

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areas of responsibilities.

- Safety representatives should conduct daily informal inspections on a rotating basis throughout the Organization facilities.

## 5.2 Weekly OHS Facility and Work Inspections

- Leadership representatives shall conduct a formal monthly OHS inspection of work areas and facilities.
  - An annual schedule of monthly inspections shall be compiled and documented.
  - Teams of at least three persons shall be assigned to each inspection on a rotating basis.
  - Inspection areas shall be assigned such that all Organization work areas and facilities will be inspected at least once in each quarter.
  - All Management, Supervision and JHSC members shall be included on the inspection teams on an equal, rotating basis throughout the year. Attendance shall be tracked for compliance.
  - Inspections shall be documented on the Monthly OHS Inspection form.
- Number of inspections conducted and Percentage of Completed Actions from the Leadership OHS Inspection will be included on the Monthly OHS Report.

## 5.3 Equipment Inspections

- Equipment inspections will be established and conducted as per the manufacturer's recommendations and/or standard practice.
- Inspection checklists will be developed for all identified equipment.
- Completed inspections forms will be filed and reported on a monthly basis.

## 5.4 Vehicle and Mobile Equipment Daily Inspections


- All vehicles and mobile equipment shall be inspected daily, or prior to use.
- An inspection check-list shall be completed and signed by the operator and kept in the vehicle.
- Completed vehicle inspection check-lists will be monitored for compliance during the regular OHS Facility and Work Inspections.

## 6.0 OHS MEETINGS


### 6.1 Monthly Management OHS Meeting (MHSC)

The Organization shall conduct a monthly, scheduled Management OHS Meeting in order to:

- review the current status of compliance to the HSMS including OHS performance metrics, trends, incidents, inspections, training and audits.
- communicate new OHS information and initiatives

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- review the status of OHS Action Logs
- review the status of the annual OHS Objectives and Targets
- provide positive re-enforcement through reward and recognition
- make recommendations for continuous improvement
- A Management OHS Committee (MHSC) shall be established under the direction of the Leadership
- The MHSC is required to establish an annual schedule with a formal agenda and shall meet on a monthly basis.
- The MHSC Agenda shall include:
  - Review of past month incidents and status of investigations.
  - OHS Key Performance Indicators and trend analysis.
  - Status of OHS Training Plan
  - Status of monthly drills and exercises
  - Status of JHSC Committee
  - Status of Objectives and Targets
  - Reward and Recognition
- Appropriate Leadership shall be defined for mandatory attendance.
  - Attendance shall include representatives from Takla Landing and Prince George.
  - Attendance shall be tracked for compliance.
- The Health & Safety Officer (HSO) shall supply a Monthly OHS Management Report for the MHSC which includes approved OHS performance metrics.
  - The Monthly OHS Management Report shall be issued to all Management Committee attendees at least 2 working days prior to the meeting.
- Trends shall be analyzed and reported on all applicable metrics.
  - Lagging Indicators for statistical measurement will include:
    - Monthly claims costs
    - Number of Lost Time injuries/illnesses and number of lost work days
    - Number of First Aids injuries/illnesses
    - Number of Medical Aid injuries/illnesses
    - Number of Restricted Work injuries/illnesses
    - Lost Time Injury/Illness Frequency (LTIR)
    - Total Recordable Injury/Illness Frequency (TRIR)
    - Dollar value of property damage
  - Leading Indicators for statistical measurement may include:
    - Number of inspections and safety meetings against plan

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- Percent of corrective actions completed from incidents, inspections and safety meetings
- Percent of workforce training completed against the plan
- Percent of equipment safety checklists completed against the plan
  - Emergency exercises planned and carried out
  - Ratio of Near Miss reporting to workforce numbers
  - Percent of leadership attendance at weekly/monthly field inspections
  - Number of Tool Box Talks conducted vs planned
- Organization statistics will include separate calculations for:
  - Takla Landing, Reserve Area and Prince George
    - Employees
    - Contractors
    - Employees and Contractors combined
- All recommendations and actions for improvement will be tracked on the MHSC Action Log by the HSO and the status will be reviewed at each meeting.

## 6.2 Joint Occupational Health & Safety Committee (JOHSC)

### 6.2.1 Formation


Takla Nation must establish and maintain a joint health and safety committee in each workplace where 20 or more workers are regularly employed for longer than one month.

- The committee must have at least four members, with equal representation from management/supervision and workers (50%/50%)
- Worker members must not exercise managerial functions and are elected by their peers through secret ballot.
- Management members are appointed by the Organization and must exercise supervisory function (e.g. scheduling, signing off on Time and Leave requests, assigning work)
- Two co-chairs must be chosen, one representing and selected by the worker members, the other by the Organization members
- All groups on a work site must be represented, as nearly as possible.

### 6.2.2 Role of the JOHSC

A Joint Occupational Health and Safety Committee (JOHSC) is an advisory group consisting of management and workers, working together to improve occupational health and safety in their workplace. The joint committee has the following specific duties and functions:


- identify situations that may be unhealthy or unsafe for workers, and advise on effective systems for responding to those situations

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- Consider, and promptly deal with complaints relating to the health and safety of workers
- Consult with workers and management on issues related to occupational health and safety, and the occupational environment
- Make recommendations to the Organization and the workers for the improvement of the occupational health and safety, and the occupational environment of workers
- Make recommendations to the Organization on educational programs promoting the health and safety of workers
- Advise the Organization on proposed changes to the workplace, including significant proposed changes to equipment and machinery, or the work processes that may affect the health or safety of workers
- Participate in inspections, investigations and inquiries as provided in the OHS provisions of the *Workers Compensation Act*.

### 6.2.3 Meetings of the JOHSC

- A joint committee must meet regularly at least once each month.
- A member of a joint committee is entitled to time off from work for
  - the time required to attend meetings of the committee, and
  - other time that is reasonably necessary to prepare for meetings of the committee and to fulfill the other functions and duties of the committee.
  - Time off is deemed to be time worked for the Organization, and the Organization must pay the member for that time.
- Takla Nation must provide the joint committee with the equipment, premises and clerical personnel necessary for the carrying out of its duties and functions.
- On request of the joint committee, the Organization must provide the committee with information respecting:
  - the identification of known or reasonably foreseeable health or safety hazards to which workers at the workplace are likely to be exposed,
  - health and safety experience and work practices and standards in similar or other industries of which the Organization has knowledge,
  - orders, penalties and prosecutions under the BC Regulations relating to health and safety at the workplace
- After each joint committee meeting, the committee must prepare a report of the meeting and provide a copy to the Organization.
- At each workplace where workers of the Organization are regularly employed, the Committee must post:
  - the names and work locations of the joint committee members,
  - the reports of the 3 most recent joint committee meetings, and

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- copies of any applicable WorkSafeBC orders for the preceding 12 months.

#### 6.2.4 Committee Recommendations


- If a joint committee is unable to reach agreement on a matter relating to the health or safety of workers at the workplace, a co-chair of the committee may send a written recommendation to the Senior Manager with a written request for a response from the Organization.
- The Organization must respond in writing to the committee within 21 days of receiving the request, either
  - indicating acceptance of the recommendation, or
  - giving the Organization 's reasons for not accepting the recommendation.
- If the Committee does not accept the Organization's position on the recommendations, a co-chair of the Committee may report the matter to the Workers Compensation Board, which may investigate and attempt to resolve the matter.

#### 6.2.5 Educational Leave for Committee Members

- Each member of a joint committee is entitled to an annual educational leave totaling 8 hours for the purposes of attending occupational health and safety training courses.
- A member of the joint committee may designate another member as being entitled to take all or part of the member's educational leave.
- The Organization must provide the educational leave without loss of pay or other benefits and must pay for, or reimburse the worker for, the costs of the training course and the reasonable costs of attending the course.

### 6.3 Annual Management OHS Program Review

- The Senior Manager shall conduct an Annual OHS Program Review after each calendar year. This review shall ensure that the status of the OHSMS, and the OHS performance of the Organization, is examined in a detailed manner. The Review will:
  - examine the progress of Objectives and Targets from the past year,
  - set Objectives and Targets for the coming year,
  - review Key Performance Indicators for Health and Safety
  - review the status of internal and external audit plans for the OHSMS,
  - make recommendations for continuous improvement,
  - Set performance incentives for OHS activities within the Organization
- The HSO shall compile, and issue, an Annual OHS Program Report by January 31 of each year
- The Annual Management OHS Program Review shall be conducted in February as part of the Monthly Management OHS Committee Meeting.

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#### 6.4 Monthly Employee OHS Meeting

All employees and contractors working at Takla Nation shall attend a Monthly Employee OHS Meeting.

- This meeting shall be:
  - conducted by a Department Manager or Supervisor, with the assistance of the HSO.
  - held at a scheduled time and location, with an appropriate agenda.
  - organized into appropriate groups such as trade, discipline, area, etc.
- A Safety Topic should be planned for each meeting
- A summary of Health and Safety performance shall be discussed including incidents, communications, initiatives, etc.
- Any OHS concerns should be requested and actioned.
- Opportunities for safety rewards and recognition should be utilized.
- The meeting must be documented and signed by all attendees.

#### 7.0 ANNUAL OHS AUDIT


The Organization shall plan and implement an audit program which will ensure an objective analysis of the content and performance of the OHSMS against an externally recognized industry standard protocol.

- Senior Management shall formally nominate an external audit standard and will take action to establish:
  - the frequency, methods, responsibilities, and reporting of audits,
  - the audit criteria and scope for each audit,
  - the selection of auditors to ensure the objectivity and the impartiality of the audit process,
- the relevant results of the audits shall be reported to stakeholders appropriately, including Managers, employees, contractors, workers' representatives, and other interested parties,
- Senior Management shall take action to address nonconformities and continually improve its OH&S performance,
- The OHS Manager shall retain documented information as evidence of the implementation of the audit program and the audit results.

#### 8.0 PERFORMANCE RECOGNITION

Takla Nation believes that the OHS Management System will establish a culture of excellence in safety by rewarding and recognizing good performance.

- The MHSC will establish a yearly budget for OHS recognition at the Annual

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OHS Review meeting. The HR Manager will sponsor the cost center.

- The MHSC will be responsible for directing the reward initiatives throughout the year.
- The HSO will be responsible to track the reward initiatives and report the status to the Committee each month.

## 9.0 PERFORMANCE DISCIPLINE


Takla Nation supports that the OHS Management System shall include a disciplinary policy as a process to encourage a change in behavior which could reduce the likelihood for incidents and illnesses.

- All employees will be expected to comply with Organization rules and policies, including safety and health rules. Employees who fail to comply with rules are subject to disciplinary action, up to and including termination of employment.
- The following steps will be followed in sequence unless the seriousness of the violation would dictate going directly to Step 2 or 3.
  - **Step 1:** A first-time violation will be discussed orally (Verbal Warning) between the supervisor and the employee. This will be done as soon as possible after the event. This discussion shall be recorded and conducted with the HSO present.
  - **Step 2:** A second-time offence will be reviewed with the employee (with the HSO present), and followed up in written form (Written Warning). A copy of this written documentation will be kept on record in the HSO files.
  - **Step 3:** A third-time violation may result in suspension without pay or possible termination, depending upon the seriousness of the violation. This notification may only be issued by the HR Manager with written support documentation from the Supervisor and the HSO.
- Examples of behavior/actions suitable for progressive discipline include:
  - Failure to follow a health and safety policy/procedure/instruction.
  - Operating Organization equipment in a reckless manner
  - Willful damage or reckless behavior
- Examples of behavior/actions suitable for immediate dismissal include:
  - Sexual Harassment or Violence in the Workplace
  - Theft or Security violation

## 10.0 FORMS

SAF-REC-003 Action Log for Monthly Management OHS Committee  
SAF-REC-004 MHSC Agenda & Minutes  
SAF-SWP-002 OHS Monthly Inspection Form



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## 11.0 RECORDS

OHS/OHS Performance Management/Weekly OHS Facility and Work Inspections  
OHS/OHS Performance Management/Equipment Inspections  
OHS/OHS Performance Management/Monthly Management OHS Meetings  
OHS/OHS Performance Management/Annual OHS Program Reports  
OHS/OHS Performance Management/Monthly Employee OHS Meetings  
OHS/OHS Performance Management/Annual OHSMC Audits  
OHS/OHS Performance Management/Employee OHS Recognition  
OHS/OHS Performance Management/Employee OHS Discipline  
OHS/OHS Performance Management/JOHSC Minutes

## 12.0 DOCUMENT HISTORY

Rev#	Date	State	Initials	Description of Changes
0.0	2020-09-20	Draft	GT	The document is initiated.