



The Corporation of the City of London Health and Safety Management Systems

Audit Performed: October 2018 – January 2019
Final Report Issued: March 2019

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Executive summary

Introduction

Internal Audit assessed the City of London's ("the City") Health and Safety Management Systems (HSMS) as part of the 2017-2018 Internal Audit plan. The City's HSMS, managed by the Health and Safety Division, is based on the Canadian Standards Association ("CSA") standard, CSA-Z1000, which provides a model for establishing, implementing, and maintaining a health and safety management system.

The purpose and objective of this review was to assess the development, implementation and effectiveness of the HSMS, as well as the City's adherence to the CSA standards and guidelines.

The detailed internal audit scope can be found in **Appendix 1** of this report.

Key strengths

Occupational Health and Safety (OHS) Policy: The City's OHS policy is a formal statement of management's commitment to protect workers and continually improve health and safety performance. The policy is reviewed annually and updated as required to ensure that it continues to be relevant to the City's needs. Health and Safety Division methods to communicate the OHS policy include workplace postings, safety talks, newsletters, department meetings, and training programs.

Health and Safety Committees: The City has created and maintained thirteen Joint Health and Safety Committees with defined terms of references having both management and worker representatives. Each committee meets regularly to discuss relevant health and safety events and actions including incidents, inspections, continuous improvement plan actions, and reported results.

Incorporation of legal requirements: The Health and Safety Division has established and implemented a process to regularly identify legal requirements and incorporate applicable legal requirements in its HSMS. Specifically, the Health and Safety Division regularly accesses available resources to identify legal changes and maintain a listing of legal requirements while assessing each new requirement and implementing solutions as required.

Risk assessment process: The Health and Safety Division, in collaboration with City departments, maintains a risk assessment process to identify, assess, and mitigate or minimize health and safety related risk exposures for each department and role. A risk assessment worksheet has been developed and implemented to support consistent procedures when working to identify hazards and existing controls, evaluate the risk, and determine control enhancement requirements. Risk assessments are required to be updated by management and supervisors every three years, or when a specific event (e.g. change in activities) arises.

Communication and awareness: The Health and Safety Division has designed and implemented a communication and awareness approach to disseminate HSMS information both internally and externally. This approach considers the current organizational structure, including the various groups of employees (i.e. casual, temporary, inside/outside workers), as well as relationships with external bodies (i.e. WSIB, Ministry of Labour). Communication with stakeholders includes posting in workplace areas, monthly newsletters, department meeting agenda items, safety alerts, memorandums, and posting to CityHub.

Incident investigation and analysis: The Health and Safety Division has implemented and maintained a workplace incident reporting and investigation program. An incident reporting form, the 'Supervisor Report of Injury' form, has been implemented to expedite the reporting process and ensure relevant details are captured for each incident occurrence. This form includes sections to record the results of investigative procedures. The Health and Safety Division reviews each incident report form for completeness and that recommended corrective actions have been noted and are appropriate.

Workplace safety inspections: The Health and Safety Division has implemented a workplace safety inspection program designed to ensure inspections are conducted in compliance with the Occupational Health and Safety Act. The program outlines the methods to inspect various elements of the HSMS, including equipment, processes, materials, buildings, and practices; and provides an approach to identify areas where health and safety hazard control is needed. The City's Joint Health and Safety Committees develop their annual schedule for conducting monthly inspections and utilize a standard inspection form to document inspection findings. Copies of each completed inspection form are forwarded to the Joint Health and Safety Committee secretary for distribution to all committee members for review and discussion.

Continuous improvement program: In direct support of the City's commitment to ongoing improvement of HSMS performance, the City has implemented and maintained a continuous improvement program (CIP). On an annual basis, in conjunction with their Health and Safety Division partner, each City department identifies and implements actions as a means/or method to continually improve the health and safety of their individual area. This program leverages the Halogen system to ensure planned actions are executed within established milestones. Progress towards completing actions is monitored by Health and Safety Division partners with updates reported annually to the City's Senior Leadership Team.

Key observations

Deloitte's review of HSMS practices identified the following observations:

Priority	High	Medium	Low	Leading Practice
Observations	0	3	3	0

Medium priority observations

HSMS 1.01: HSMS program reviews

The Monitoring, Measuring and Management Review of HSMS program has not been reviewed within the last three years, which is a requirement documented within the program parameters. The Health and Safety Division has created and implemented a set of programs to support the HSMS. However, not all programs clearly articulate requirements for periodic review and revision. Irregular and unscheduled maintenance of related HSMS programs may result in outdated approaches that fail to adequately mitigate current risks or meet HSMS needs and objectives.

Gary Bridge, Manager III, Human Resources and Corporate Services
 September 30, 2019

HSMS 2.0: Information management system

The Health and Safety Division has self-identified the need for an information management system to improve and streamline related training management operations. Additionally, an information management system is currently not being used to more effectively record and manage incidents,

inspections, and legal requirements. Lack of an information management system to support HSMS may lead to suboptimal use of existing human capital and difficulty in reporting meaningful information.

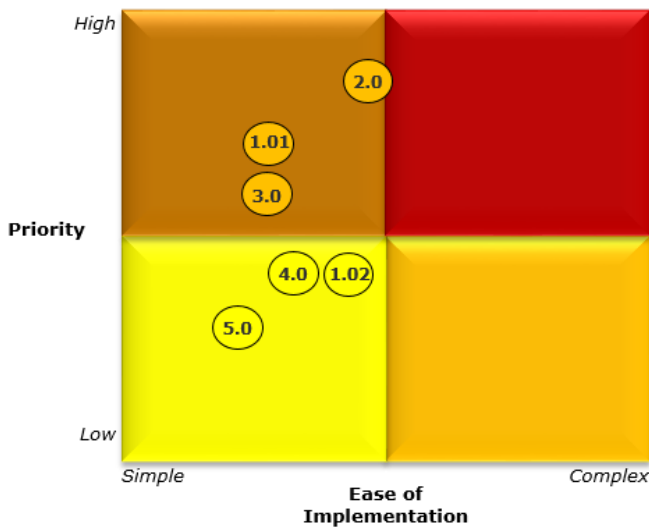
Gary Bridge, Manager III, Human Resources and Corporate Services
December 31, 2019

HSMS 3.0: Audit program

The City or third parties conduct periodic audits of the City’s HSMS against the CSA Z1000-14 Standards and audit certain health and safety related programs (e.g., WSIB, emergency medical response and first aid, electrical safety, etc.). However, the Health and Safety Division has not documented a comprehensive audit program which is a requirement by Standard 4.5.4 (Audits) of the CSA Z1000-14 Standards. The City may not be adequately assessing all risk mitigation strategies to verify HSMS effectiveness for the City.

Gary Bridge, Manager III, Human Resources and Corporate Services
December 31, 2019

Priority heat map

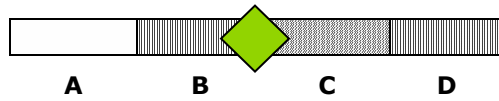


Conclusion

Based on our assessment of HSMS practices we noted three medium priority observations with the potential to impair the effectiveness of current processes and three low priority observations with minor process inefficiencies identified. The issues noted in the report should be addressed in a timely manner to enhance current controls and mitigate relevant risks.

Management has provided action plans for the observations noted in the ‘Detailed observations and recommendations’ section.

The following scale depicts our overall process conclusion as it relates to the scope of areas audited as outlined above:



Description	Definition
A	No or insignificant process control or efficiency weaknesses identified
B	Minor process control or efficiency weaknesses identified
C	Moderate process control or efficiency weaknesses identified
D	Significant control process or efficiency weaknesses identified Impairing the effectiveness of the process

Detailed observations and recommendations

Observation 1.0 – Monitoring and measurement

Observation	Implication	Recommendation	Management comments and action plan	Responsible party and timing
<p>MP HSMS 1.01 HSMS program reviews</p> <p>The Monitoring, Measuring and Management Review of HSMS program has not been reviewed within the last three years, which is a requirement documented within the program parameters.</p> <p>The Health and Safety Division has created and implemented a set of programs to support the HSMS. However, not all programs state requirements for a periodic review.</p>	<p>HSMS 1.01 HSMS program reviews</p> <p>Irregular and unscheduled maintenance of related HSMS programs may result in outdated approaches that fail to adequately mitigate current risks or new hazards not previously identified, or to ensure appropriate linkage to management of change in the event of newly identified or expected upcoming risk.</p>	<p>HSMS 1.01 HSMS program reviews</p> <p>The Health and Safety Division Management should conduct a review of the Monitoring, Measuring and Management Review of HSMS program. In addition, Health and Safety Division Management should establish an HSMS program registry that details critical program elements including review requirements and date of last review in order to develop a schedule of program reviews to meet targeted review timelines. Management should also review and update each program to ensure all program documentation clearly articulates review requirements.</p>	<p>Management agrees</p> <p>An existing document outlining the list of procedures will be reviewed and updated by management to identify any programs that need defined periodic review requirements. Management will also establish a rolling schedule to conduct reviews of HSMS programs over a three-year period, prioritizing higher impact programs. Any significant changes will involve the Joint Health and Safety Committees. Annually, the Health and Safety Division will disclose that program reviews are being conducted in accordance with required frequency.</p>	<p>Gary Bridge, Manager III, Human Resources and Corporate Services</p> <p>September 30, 2019</p>

LP	<p>HSMS 1.02 HSMS program dashboard</p> <p>The Health and Safety Division has implemented a series of related programs including incident reporting, inspections, training, etc. While procedures have been designed to record and report HSMS events and activities, these are not supported by readily available dashboards or scorecards to easily determine the extent to which the health and safety initiatives, objectives, and targets are being met and to identify and address significant items in a timely manner.</p>	<p>HSMS 1.02 HSMS program dashboard</p> <p>Without a process to aggregate and easily report critical activities surrounding HSMS, the human capital, financial and other resources may not be effectively deployed and key stakeholders may be unaware of the progress towards objectives and desired outcomes.</p>	<p>HSMS 1.02 HSMS program dashboard</p> <p>Management should develop a standard dashboard or scorecard designed to highlight significant events, as well as, adherence to OHS policy expectations and achievement of objectives and targets for regular management monitoring.</p>	<p>Management agrees</p> <p>Management will consult with stakeholders to identify and define a single set of key performance indicators (KPIs) to be included in a dashboard, as well as dashboard audience and frequency. Management will evaluate data requirements and opportunities to leverage existing metrics and tools / resources (e.g., Microsoft Power BI) to implement a dashboard. A standard operating procedure will also be developed to support regular dashboard updates and distribution.</p>	<p>Gary Bridge, Manager III, Human Resources and Corporate Services September 30, 2019</p>
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Observation 2.0 – Information management system

	Observation	Implication	Recommendation	Management comments and action plan	Responsible party and timing
MP	<p>HSMS 2.0 Information management system</p> <p>The Health and Safety Division has self-identified the need for an information management system to improve and streamline related information management and training management operations. Internal Audit identified manual activities including procedures to record and maintain training information, identify and follow-up on training requirements, assign training based on staff position, etc.</p>	<p>HSMS 2.0 Information management system</p> <p>Lack of an information management system to support HSMS results in suboptimal use of existing human capital and hinders managing and reporting training information.</p>	<p>HSMS 6.01 Information management system</p> <p>In the short-term, Health and Safety Division Management should perform an evaluation to identify opportunities to utilize existing City tools and resources to improve health and safety information management. Management should also collaborate with City stakeholders to assess opportunities to adopt an information management system as a long-term solution</p>	<p>Management agrees</p> <p>An information management system is needed to address related Health and Safety operational challenges and improve the effectiveness of data management including enabling and empowering supervisor responsibility over health and safety matters for the City (e.g., training records). Management will work with Information Technology</p>	<p>Gary Bridge, Manager III, Human Resources and Corporate Services December 31, 2019</p>

<p>Additionally, an information management system is currently not being used to more effectively record and manage incidents, inspections, and legal requirements.</p>	<p>to reduce manual Health and Safety Division activities and other activities including training management procedures.</p>	<p>Services, Finance, and other stakeholders to see what options are available to track current training records as well as expired records.</p>
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Observation 3.0 – Audit program

	Observation	Implication	Recommendation	Management comments and action plan	Responsible party and timing
<p>MP</p>	<p>HSMS 3.0 Audit program The City or third parties conduct periodic audits of the City’s HSMS against the CSA Z1000-14 Standards and audit certain health and safety related programs (e.g., WSIB, emergency medical response and first aid, electrical safety). However, the Health and Safety Division has not documented a comprehensive audit program, which is a requirement by Standard 4.5.4 (Audits) of the CSA Z1000-14 Standards.</p>	<p>HSMS 3.0 Audit program The City may not be adequately assessing all risk mitigation strategies to verify HSMS effectiveness for the City. In addition, the lack of an audit program may result in unidentified noncompliance with health and safety regulation or CSA standards, which are regularly revised and updated.</p>	<p>HSMS 3.0 Audit program Health and Safety Division Management should develop and implement a formal audit program aligned with Standard 4.5.4 (Audits) of the CSA Z1000-14 Standards. To meet this Standard, the audit program should have the following:</p> <ul style="list-style-type: none"> • Criteria for auditor competency and selection, audit scope, frequency of audits, audit methodology and analysis of results, and reporting; • Process to consult with workers and representatives; and • Process to conduct audits at planned intervals. 	<p>Management agrees Recognizing audits are performed over the City’s HSMS, Management agrees that an audit program needs to be formalized to better align with CSA Z1000-14 Standard 4.5.4 (Audits). Management will continue formalizing an audit program to define its purpose, application, stakeholders, procedures, and consolidate applicable requirements that would trigger an audit.</p>	<p>Gary Bridge, Manager III, Human Resources and Corporate Services December 31, 2019</p>

Observation 4.0 – Reporting timelines

Observation	Implication	Recommendation	Management comments and action plan	Responsible party and timing
<p>LP HSMS 4.0 Reporting timelines The Health and Safety Division prepares and issues reports annually to summarize and communicate HSMS related events and activities to stakeholders, including the Senior Leadership Team and Joint Health and Safety Committees. However, the manual nature of the report preparation process has resulted in delays issuing the previous two year-end reports restricting stakeholder ability to obtain an understanding of activities representative of the current health and safety environment.</p>	<p>HSMS 4.0 Reporting timelines Resources may not be appropriately aligned with HSMS objectives and organizational needs. Delayed health and safety results may restrict the City’s ability to identify areas of improvement and form a timely response. The current report preparation process has resulted in suboptimal use of staff time and effort.</p>	<p>HSMS 4.0 Reporting timelines Health and Safety Division Management should review the health and safety reporting process to identify and improve common factors that affect the issuance of each report. Management may also consider reviewing the report with key stakeholders to ensure the report is focused on the key metrics required, and whether there is opportunity to have the information reported in a more concise manner.</p>	<p>Management agrees Management agrees that HSMS reporting timelines need to be improved while recognizing the current level of manual effort required when preparing the report due to the absence of an information management system. In the near term, Management will continue to consult with stakeholders and review the HSMS report and underlying data to identify opportunities to streamline activities or further reformat the report. Management will document in Occupational Health and Safety Management procedure the timeline for completion of annual report. It will be noted that this will be done by end of May each year.</p>	<p>Gary Bridge, Manager III, Human Resources and Corporate Services June 30, 2019</p>

Observation 5.0 – Forms and submissions

Observation	Implication	Recommendation	Management comments and action plan	Responsible party and timing
<p>LP HSMS 5.0 Forms and submissions</p> <p>Although the City has developed forms and templates to support HSMS events and activities, not all forms or templates articulate how and where to submit the form. Additionally, not all form templates allow for electronic submission.</p>	<p>HSMS 5.0 Forms and submissions</p> <p>Failure to include submission requirements and utilize available technologies may lead to suboptimal processing of reported health and safety events or requests.</p>	<p>HSMS 5.0 Forms and submissions</p> <p>Health and Safety Division Management should conduct a review of existing HSMS related forms and identify opportunities to update forms to include how and where to submit as well as enable electronic submission.</p>	<p>Management agrees</p> <p>A review will be conducted over existing forms and revisions made to improve user understanding and experience. Where possible, workflows will be revised to allow for electronic submission of forms.</p>	<p>Gary Bridge, Manager III, Human Resources and Corporate Services</p> <p>December 31, 2019</p>

Appendix 1: Internal Audit detailed scope

Specifically, the internal audit addressed the following areas:

Reviewed and assessed the City's HSMS design and development

- Reviewed and assessed the policies and governing processes frameworks in place to ensure:
 - Appropriate planning and development,
 - Overall commitment, leadership, and participation,
 - Management commitment and leadership,
 - Worker participation,
 - Policy relevance and compliance to governing standards,
 - Program compliance to legal or legislative requirements, and
 - Roles and responsibilities appropriateness and consistency with policy and corporate expectations.

Reviewed and assessed HSMS program's compliance to the Ontario Health & Safety ("OH&S") legislation and HSMS program's adherence to CSA standards

- Reviewed and assessed programs in place to ensure they meet the guidelines set forth to include:
 - Competencies and training,
 - Communication, competency assurance and program awareness,
 - Hazard and risk management,
 - Emergency prevention, preparedness and response,
 - Incident reporting, investigation and analysis,
 - Procurement and contracting,
 - Contractor Management, and
 - Management of change and document control.





Reviewed and assessed the HSMS implementation and effectiveness

- Reviewed the HSMS to ensure programs and process have been successfully executed through the following areas:
 - Using the Plan-Do-Check-Act methodology,
 - Infrastructure and resources evaluations and management,
 - Development of safety objective and targets,
 - Linkage of roles and responsibilities to the objective and targets set,
 - Appropriate hazard identification and risk assessment,
 - Monitoring and measurement, and,
 - Auditing and continuous improvement through preventive and corrective actions.

Appendix 2: Internal Audit rating scale

Individual observation prioritization

Internal Audit will prioritize each observation and recommendation within a report using a four point rating scale. The four point rating scale will be as follows:

Description	Definition
 High	Observation is high priority and should be given immediate attention due to the existence of either significant internal control risk or a potential significant operational improvement opportunity.
 Medium	Observation is a moderate priority risk or operational improvement opportunity and should be addressed in the near term.
 Low	Observation does not present a significant or medium control risk but should be addressed to either improve internal controls or process efficiency.
 Leading Practice	Consideration should be given to implementing recommendations in order to improve the maturity of the process and align with leading practices.

Appendix 3: Stakeholder involvement

In conducting the HSMS assessment, the following management and staff were interviewed to gain an understanding of the City's HSMS processes and practices.

Stakeholder	Position
Gary Bridge	Manager III, Human Resources and Corporate Services
Dave O'Brien	Division Manager, CEMC
Christopher Goodall	Specialist I, Occupational Health and Safety
Karen Christopher	Specialist I, Occupational Health and Safety
Various – Deloitte met with various management and staff in select Service Areas to gather an in-depth understanding of Occupational Health and Safety related operations and perform audit procedures.	

Appendix 4: Audit procedures performed

As part of the HSMS assessment the following procedures were performed:

- Conducted a planning meeting with the Managing Director of Corporate Services and Chief Human Resources Officer and Manager of Human Resources and Corporate Services;
- Updated and issued a finalized Project Charter and request for information;
- Conducted meetings and interviews with Occupational Health and Safety management and staff to obtain an understanding of:
 - Design and development of HSMS including policies and governing processes,
 - Approach to comply with the Ontario Health & Safety (“OH&S”) legislation and adhere to CSA standards, and
 - Implementation and operation of HSMS including related programs and processes;
- Obtained documentation regarding relevant procedures and controls to perform an inspection of:
 - Occupational Health and Safety Act and Regulations;
 - Human Resources organizational chart and role responsibilities;
 - Occupational Health and Safety Policy and other related City policies and codes of conduct;
 - Relevant reports (e.g., Annual Health and Safety Report, etc.);
 - Continuous improvement plans;
 - Relevant programs (e.g., Asbestos Management, etc.);
 - Relevant committee materials (e.g., terms of reference, meeting minutes, etc.);
 - Standard operating procedures (e.g., Workplace safety inspection, etc.);
 - Standard guidelines (e.g., Stretching at the workstation, etc.);
 - Relevant forms and templates (e.g., Health and Safety Assessment, Incident Investigation, etc.);
 - Health and Safety training program materials;
 - Risk assessment materials; and
 - Example communications (Health and Safety Talk, etc.);
- Conducted audit procedures to test against legislative requirements and CSA Z1000 standards;
- Drafted preliminary observations and verified observations with management;
- Conducted a closing meeting with key management stakeholders to validate and communicate our findings; and
- Issued this internal audit report with our detailed observations.

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