

 <b>SAFETY PROCEDURE/ GUIDELINES</b>	<b>NUMBER: 96-03</b>
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<b>SUBJECT:</b> INTERNAL INSPECTION PROGRAM	<b>EFFECTIVE: FEBRUARY 13, 2002</b>
	<b>UPDATED: AUGUST 2023</b>
	<b>SUPERSEDES: JUNE 2021</b>
<b>APPLIES TO:</b> All Departments	<b>APPROVED:</b> JOHSC

## OBJECTIVES

The objectives of the internal inspection program are:

1. To protect workers and other members of the University Community through the identification and correction of potential hazards in the workplace.
2. To ensure the University is in compliance with the Occupational Health and Safety Act of Ontario and related Regulations.
3. To educate the University Community about the requirements of the Occupational Health and Safety Act and Regulations and other applicable standards and practices which will enhance the health and safety of the University Community.

## PHILOSOPHY

The primary aim of the Internal Inspection Program is the protection of the workers and other members of the University Community through the identification and correction of hazards.

In addition, since the inspection is an opportunity to meet with members of the University Community it is an excellent time to make people aware of the requirements of the Occupational Health and Safety Act. The internal inspection program is an awareness and education program in addition to an enforcement program.

The Occupational Health and Safety Act requires that a worker representative from the Joint Health and Safety Committee inspects part of the workplace monthly with the entire workplace inspected annually. The Act requires that the employer provide the resources for this to happen. The University's Internal Inspection Program is the mechanism by which these inspections occur on the campus of the Western University.

The Occupational Health and Safety Act of Ontario and related Regulations serve as the minimum standards for the program. The Act states that the employer shall take every

precaution reasonable for the protection of the worker. Additional measures taken may be guided by manufacturer's recommendations; standards developed by professional organizations; and practices followed by other businesses conducting similar work. The goal is for the University to follow the most current standards applicable relative to an identified workplace risk. Availability of financial resources to mitigate a risk shall not be a determining factor in the University taking action.

## **WHO DOES INSPECTIONS?**

Members of the Joint Occupational Health and Safety Committee shall inspect the workplace on a regular basis for the purpose of examining the conditions of the workplace with inspections scheduled for at least once (1) per month and with the entire University being inspected in the course of every one (1) year. Each union with representatives on the Committee shall have an equal right to participate in these inspections without loss of pay or reduction of benefits for their participating members. The inspections are conducted jointly by a worker member of the Joint Occupational Health and Safety Committee, a representative from Health Safety and Well-Being and a representative from the unit or units being inspected. Examples of the latter include: department representatives; budget unit heads; and building managers. At the completion of the inspection a meeting is held with all persons involved in the inspection and any others as may be necessary to review the findings. A discussion of all items which may lead to orders for corrective action will be held at this time. Operations or equipment which present an immediately dangerous health and safety hazard must be dealt with using the Health and Safety Policy ([MAPP 3.1](#)) and the suspension of operations procedure.

## **INSPECTION ORDERS**

Orders for correction of health and safety hazards will be written under the following situations:

1. Contraventions of the Occupational Health and Safety Act of Ontario and related Regulations.
2. Contraventions of other legislation, guidelines, codes and procedures such as the Fire Code, Gasoline Handling Act, Medical Research Council (MRC) Guidelines etc., where the violation creates a potential risk to health and safety.
3. Contraventions of Occupational Health & Safety Committee approved policies, the Western Health and Safety Policy, or Western Procedures/Guidelines.
4. Breaches of other written standards such as manufacturer's recommendations, engineering standards [Canadian Standards Assoc. (CSA); National Fire Prevention Association (NFPA); American Society of Heating, Refrigeration and Air-conditioning

Engineers (ASHRAE) etc.] or other recognized procedures for specialized equipment and operations.

## **RESPONSIBILITIES**

The Budget Unit Head will be supplied with a summary of this procedure/guideline prior to the inspection. The Budget Unit Head will designate a representative of the unit to work with the inspection team and will advise all members of the unit of the scheduled inspection. Budget Unit Heads have primary responsibility for ensuring that all orders are complied with, initiated, or appealed within the time stated on the order.

Health Safety Well-being will be responsible for organizing and scheduling the Internal Inspection program, in consultation with the Joint Occupational Health & Safety Committee such that at least one inspection in a month is completed and all areas of Western University are inspected within the year. Health Safety Well-being will be responsible for documenting and reporting the orders from an inspection. Health Safety Well-being will conduct the follow up of overdue orders with the departmental contact who accompanied the inspection. Follow up could include communication by phone or electronic notification or subsequent site visits to assess progress of resolutions. If required, further contacts may include the budget unit head or the person responsible for an individual area to be involved in the resolution.

The Joint Occupational Health & Safety Committee monitors compliance of outstanding orders and advises the University accordingly. Outstanding orders involving violations of the Occupational Health and Safety Act and related Regulations for which OHS has received inadequate response will be referred to the Joint Occupational Health and Safety Committee (JOHSC). HSW will notify the budget unit head by e-mail about any order outstanding beyond the due date. When an order is overdue by 21 days, with no response, a follow up e-mail will be sent to the budget unit head with a copy sent to the responsible Dean or Associate Vice President. A copy of all this correspondence will also be sent to the worker member of the JOHSC who participated in the inspection. The status of the order and the comment field will be updated prior to each meeting of the JOHSC. The JOHSC will decide if the violation is significant enough to warrant further sanctions as per such as: issuing a suspension of work notice; tagging and locking equipment out of service; or having qualified persons correct the situation and billing the budget unit.

In order to facilitate this process, the following steps will be followed.

1. Prior to each JOHSC meeting HSW will compile a list of compliance orders 21 days outstanding beyond the due date where there has been an inadequate response from the department.
2. The JOHSC will discuss these orders and decide if they need to contact the department unit head in writing.
3. In the case of serious infractions the JOHSC may choose to carry out further sanctions as outlined above.

Facilities Management is responsible for providing an estimate for all work requiring alterations to the physical structures of buildings and services contained within.

### **REPORTING OF INSPECTION ORDERS**

The Department of Human Resources, Health Safety and Well-Being (HSW) maintains all records of the internal inspection program for a period of 10 years. Included in these records will be all areas inspected; orders written and the outcome of each, and who inspected each area.

Orders written for a given Department or Unit are to be sent to the budget unit head, the unit representative and the appropriate Dean or Associate Vice President within three working days of the inspection. A copy of the order will also be sent to the worker member of the Joint Occupational Health and Safety Committee (JOHSC) who was involved in the inspection.

A summary of all outstanding inspection orders are circulated to members of the Joint Occupational Health and Safety Committee with the meeting notice and agenda.

Members of the Committee can have access to the compliance order information from previous inspections for an area as requested.

(Revision August 2023)