

 <b>SAFETY PROCEDURE/ GUIDELINES</b>  Western	<b>NUMBER: 96-03</b>
	<b>PAGES: 4</b>
<b>SUBJECT:</b>  INTERNAL INSPECTION PROGRAM	<b>EFFECTIVE:</b> FEBRUARY 13, 2002 <b>UPDATED:</b> AUGUST 2012
	<b>SUPERSEDES:</b> OCTOBER 16, 2000
<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 not primarily 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. However, we at Western feel that we have an obligation to follow the most current applicable standards available. Indeed the Act states that the employer shall take every precaution reasonable for the protection of the worker. These standards may include: manufacturer's recommendations; standards developed by professional organizations; and practices followed by other businesses conducting similar work. This is consistent with the University's Occupational Health and Safety Policy.

The ultimate goal is for the University to follow the most current standards applicable in the field of occupational health and safety. This may be limited in a practical sense by fiscal restraint but finances will not be the only factor used in determining the University's use of a health or safety standard.

## **REPORTING OF INSPECTION ORDERS**

The Department of Occupational Health and Safety (DOHS) 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, his/her 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 Occupational Health and Safety Committee with the monthly meeting notice and agenda. In addition individual members of the committee may request a summary of all orders written during the previous month, or all the orders written in the last inspection of a given building or department.

## **CRITERIA FOR 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.

## **WHO DOES INSPECTIONS?**

The inspections are conducted jointly by a worker member of the Joint Occupational Health and Safety Committee, a representative from the Occupational Health and Safety 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 will be held at this time.

Operations or equipment which present an immediately dangerous health and safety hazard must be dealt with using the Policy and Procedure for the Resolution of Unsafe Conditions.

## **INSPECTION PROGRAM**

The committee will endeavour to inspect all areas of the Western University on an annual basis. To accomplish this, areas of the campus will be inspected weekly except during the months of July and August.

## **RESPONSIBILITIES**

Occupational Health and Safety (OHS) will be responsible for organizing and scheduling the Internal Inspection program, in consultation with the Joint Occupational Health & Safety Committee.

The Budget Unit Head will be supplied with a copy of this procedure/guideline prior to the 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. Generally the time given will be 24 hours.

OHS will conduct the initial follow up of overdue orders with the departmental contact who accompanied the inspection. Further contacts may include the budget unit head or the person responsible for an individual area.

The 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 & Safety Committee (JOHSC). OHS 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 such as: issuing a stop work order; 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 OHS will compile a list of compliance orders 21 days outstanding beyond the due date where there has been an inadequate response from the department in question.
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.

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