

# Inspection Policy & Program



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## Scope:

All fleet vehicles, heavy and small equipment, machinery and hand tools, trailers, worksites and corporate buildings, WHMIS inventory and sites/work areas.

## Policy:

It is Bernard Rochefort Ltd's policy to maintain a comprehensive program of health and safety inspections at all its workplaces and facilities. An effective inspection program is the primary tool to measure existing and potential hazards to implement corrective action. It is the responsibility of Bernard Rochefort Ltd to respond to these reported hazards in a timely manner and to ensure a repair program and or preventative maintenance system is in place. Concerns addressed through the formal monthly worksite inspections conducted by the H&S Representatives will be responded to within the 21 day follow up as defined further in this program. These inspections will also serve as a means of determining the level of compliance with established standards for hazard controls, safe work practices and safety rules. General Managers and supervisors are to conduct work site specific inspections on a weekly basis to constantly address the need for detecting and correcting unsafe conditions and acts. Operators are responsible for pre start/shift and post shift inspections of their heavy equipment. Drivers of fleet vehicles are responsible for performing inspections of their trucks prior to trip start; the mechanics must conduct PM inspections. With this process in place, Bernard Rochefort Ltd will be able to recognize, eliminate hazards, or implement controls for hazards that cannot be fully eliminated in the workplace. This process keeps supervisors and workers vigilante and communicates our commitment to health and safety to our workers.

## The Law:

Section 8(1),(10),(11) of the OH&SA relating to Health and Safety Representatives and Section 25(1),(2), relating to employers responsibilities Section 27(1),(2) relating to supervisors responsibilities and section 28(1)(2) relating to worker responsibilities under the Occupational Health and Safety Act of Ontario RSO 1990. These elements are not the sole sections pertaining to responsibilities and the reader is encouraged to review the OHS Act and its regulations for Construction in its entirety.

## Responsibilities Defined:

All members of Bernard Rochefort Ltd have a role in conducting workplace inspections. They are as follows:

### All employees

They are required to participate in the inspection program through informal inspections of their workplaces/sites. As part of their daily routine, employees are expected to maintain a practiced awareness and vigilance of their surroundings and work habits that will identify potential hazards. Employees have a duty to report all hazards to their supervisors. Section 28(1)(a) of the OHS Act states that

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“a worker shall work in compliance with the provisions of this Act and its regulations Section 28(1)(c) and (d) requires in part that a worker report any defect in material or equipment or any contravention of the Act and its Regulations that they are aware of. Section 28(2)(a) states in part that no worker shall make any protective device or guard defective and 28(2)(b) states in part that that they are not to use a machine, equipment, device or thing in such a way as to harm themselves or other co workers

## Supervisors

They are responsible for conducting informal inspections of all their workplaces and for directing formal inspections of workplaces under their control.

Supervisors are also responsible for conducting a weekly site inspection. Not only is this legislation but it allows the supervisor to be intimately involved in the preventative measures of health and safety. The supervisor is also responsible to document the site inspection and send a copy to the main office. Supervisors are also responsible to correct any issue that are detected/found on site no matter how it was brought to his attention (ie worker rep inspection, President inspection, sub-contractor inspection, etc...) Corrections to the identified hazard(s) must be done immediately as this is paramount to the health and safety of all on site. Once the identified hazard has been corrected, it should be documented in the proper section of the site inspection form.

They will ensure that the Worker Health and Safety Representatives are conducting their monthly formal inspections and will provide assistance to them to complete this task. Supervisors are responsible for advising all workers under their supervision of any potential hazard and to ensure that the OH&SA are complied with in respect to workplace hazards and PPE. Supervisors must work in compliance with the OHS Act and its regulations and Section 27(2)(a) states in part that a supervisor must advise a worker of any potential or actual danger to the health and safety of a worker that he is aware of. Section 27(2)(b) states in part that, where necessary, the supervisor must provide written instruction as to the measures and procedures required for the protection of the worker and Section 27(2)(c) states that the supervisor must take every precaution reasonable in the circumstances for the protection of the worker.

## The Worker Health and Safety Representative

They will play a key role in the monthly worksite inspection as provided for under the Occupational Health and Safety Act. They shall conduct a monthly site inspection, record and analyze results on the worksite inspection form and make recommendations for corrective action and follow up to ensure proper actions have taken place. Section 8(6) of the OHS Act specifies that an inspection will occur at least monthly or, if not practicable, Section 8(7) allows for a partial inspection of each element of the business split out on a monthly basis. Section 8(11)(a-c) is the most relevant legal reference to the responsibilities and powers of the Health and Safety Rep. These state in part that the Rep shall be privy to any information pertaining to the conducting or test taking of any equipment, machine, thing, device, article, material, biological or chemical agent or physical agent in or about the workplace for the purpose of occupational health and safety, that they are to be consulted about and present at the beginning of testing if they so wish, that they be advised of any potential or existing hazards that the employer share with them similar health and safety experiences of other employers in similar industry if the employer is aware of those issues.

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## Health and Safety Coordinator

He/She will assist with monthly and weekly worksite inspections as needed. This person will ensure that a copy of the completed monthly summary inspection report is provided to the Company President for review and sign off and that a 21 day follow up is initiated and monitored for all issues requiring corrective action in addition to any follow up undertaken by the Health and Safety Representative. This Company inspection will consist of a review of all site inspections conducted by all supervisors, worker reps, President and their own Coordinator inspections. This summary form will allow a better look at the companies' sites and their health and safety status and a proper method of monitoring follow ups.

## The employer

Will be responsible for ensuring that an inspection program and preventative maintenance program is in place and that the program is enforced. The employer is responsible for providing safe and effective tools and equipment and for ensuring that a repair program is in place to respond to deficiencies that could lead to unsafe acts or conditions for the protection of their workers. Section 25 of the OHS Act is a lengthy section. The relevant sections that pertain to inspections and PM programs are as follows: Section 25(1)(b) that material, equipment and protective devices provided are maintained in good condition, Section 25(2)(b) states in part that they will provide instruction and information and supervision to a worker to protect the health and safety of the worker (d) that they shall acquaint a person in authority over a worker with hazards in the workplace, (c) that they will afford assistance and co-operation to a health and safety representative, (h) that they will take every precaution reasonable for the protection of a worker and (l) that they will provide the Health and Safety Rep with a copy of any report pertaining to workers health and safety. Senior management is also responsible for conducting a yearly management hazard assessment in order to prepare for the yearly review of the OH&S program/policy review.

## Enforcement:

The H&S Coordinator will report any delays in inspection process to the President who, in turn, will administer discipline and provide intervention action.

## Measurement:

Review of infractions, analysis reports, and discipline steps. As part of this policy and program. Bernard Rochefort Ltd supports preventative maintenance of all its tools, equipment, fleet and buildings to ensure that safe operating conditions are maintained.

## Legislative Requirements to Inspect

The Occupational Health and Safety Act and its regulations require workplaces to conduct inspections as often as necessary to ensure safe workplaces.

## OHS Act Part 11 Administration Section 8 (6) states.....

“Unless otherwise required by the regulations or by an order by an inspector, a health and safety representative shall inspect the physical condition of the workplace at least once a month.”

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## Section 8(7) states.....

“If it is not practicable to inspect the workplace at least once a month, the health and safety representative shall inspect the physical condition of the workplace at least once a year, inspecting at least part of the workplace in each month.”

## Section 11 states....

“A Health and Safety Representative has the power

- a) to obtain information from the constructor or employer concerning the conducting or taking of tests of any equipment, machine, device, article, thing, material or biological, chemical, or physical agent in or about the workplace for the purpose of occupational health and safety;
- b) to be consulted about and be present at the beginning of testing referred to in clause (a) conducted in or about the workplace if the representative believes his or her presence is required to ensure that valid testing procedures are used or to ensure that the test results are valid; and
- c) to obtain information from the constructor or employer respecting
  - (i) the identification of potential or existing hazards
  - (ii) health and safety experience and work practices in similar or other industries of which the constructor or employer has knowledge.

**Section 12 states.....**“a constructor or employer who receives written recommendations from a health and safety representative shall respond in writing within 21 days.”

**Section 13 states....**“A response of a constructor or employer under subsection 12 shall contain a timetable for implementing the recommendations the constructor or employer agrees with, give reasons why the constructor or employer disagrees with any recommendations that the constructor or employer does not accept.

**Further....Bernard Rochefort Ltd** expects that the inspection team will make recommendations to the workplace management that will allow for appropriate corrective measures. The recommendations may be made formally or informally. Where the inspection team feels a formal recommendation is necessary, it will be documented and given to management. Management in turn is required to respond to the formal recommendation in writing within 21 days. Informal recommendations may be made verbally although possibly recorded in inspection notes and meeting minutes.

The written response from management must indicate agreement or disagreement of the formal recommendation. Where agreement is noted, the matter of scheduling the implementation of corrective action must be outlined. If the corrective action cannot be scheduled for a significant period of time, the matter of temporary hazard controls must be discussed and periodic updates must be provided on the progress of the implementation. Where management disagrees, it must state its reason for disagreement. In this situation an MOL inspector will be called in by the H&S coordinator and/or H&S Rep or Engineer and management will abide by their decision.

The Health and Safety Representatives should keep records of their inspection activities. Bernard Rochefort Ltd will provide the H&S Rep with a binder, pen and forms to document their findings. The Health and Safety Coordinator will participate in the monthly worksite inspection with the Health and Safety Representatives to provide additional support if required. The Coordinator will also follow up on the 21 day follow up.

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## Types of Inspections

Normally, inspections consist of walking through a workplace to determine the level of compliance with established standards for hazard controls, safe work practices and procedures. It is often advisable to speak with workers and supervisors as part of this process to find out if they are aware of possible problems. Inspections are meant to be proactive and to assist with preventive measures. It is hoped that with diligent monthly inspections reactionary measures like accident investigations can be reduced or eliminated.

The purpose of inspections is to identify:

- potential problems
- equipment deficiencies
- improper employee action
- inadequacies in hazard controls or remedial actions; and
- the effects of change, including new hazards that were not previously identified

Bernard Rochefort Ltd conducts three types of inspections and they are as follows:

- formal
- informal; and
- pre-shift (pre operation/pre start) project start and PPE

### **Formal Inspections (Monthly Health and Safety Rep Inspections, Weekly Site Safety, Weekly Sub Contractor Inspections, Management Inspections)**

Formal monthly inspections are planned, careful examinations of the Bernard Rochefort Ltd company that are conducted monthly by the Worker Health and Safety Representatives with support from the Health and Safety Coordinator. The findings are recorded on the monthly site inspection form and a copy provided to management on a monthly basis. Bernard Rochefort Ltd will post these monthly reports on the Health and Safety First Aid Board in the Shop. At the end of each month these will be placed in the Worksite Inspection Binder for the current year and then will be filed with the Health and Safety Coordinator. A guide to assist H&S Reps is attached to the reporting form. These inspections will also include formally a minimum of two employee contacts per monthly inspection. Weekly Site inspections are conducted by the supervisors. These inspections are conducted by the supervisor on site and are recorded on the Weekly Site inspection log. As per the Monthly inspections, results are posted on the safety board, records are retained in the inspection log and responses are to be addressed within 21 days of any reportable hazard or concern.

These site inspections will also include a minimum of two formal worker contacts and or worker observances. The reporting format provides the specifics for the elements of inspection.

**Management inspections are conducted by the President and General Manager of various locations twice per year.**

### **Informal Inspections**

Informal Inspections are ongoing inspections continually conducted by supervisors and workers as part of their daily job responsibilities. These inspections usually do not generate a formal inspection report. Informal inspections should be undertaken on a daily or weekly basis and are particularly important in temporary workplaces (off site locations) as these workplaces may not always get a formal inspection.



## Formal Inspections

Formal inspections are ongoing inspections that must be documented and conducted as per their scheduling. The schedule is as follows:

- Weekly: The site supervisor must conduct a site inspection for his work site on a weekly basis. If there is a break in work for a week, the supervisor should document this on the next site inspection as to explain why the site inspection was not completed for that week.
- Monthly: The worker rep must conduct a site inspection each month for their current location. It has been suggested that all worker reps conduct a site inspection mid-month.
- Bi-annually: The president or upper management must conduct a site inspection on a bi-annual basis. This means that there will be an upper management inspection in March and November or each year.

Formal site inspections have 3 components.

1. Checklist Section: This section lists all the items reviewed on site
2. Worker Interaction Section: Lists who was interviewed and issues that have arisen from this
3. Corrective Actions / Follow ups: Hazards or Issues identified must have a corrective action written down here to ensure that the issue gets resolved.

**Hazardous conditions** are noted and are corrected immediately or reported for corrective action. These are observations made by workers who feel that a hazard may place them or a co-worker at risk. The worker can obtain the hazardous conditions report from either the H&S Rep or from his supervisor to complete at any time.

## Pre-Shift/Pre Start Inspections for equipment

This inspection refers to inspections of equipment before it is put into operation. This may be routine, such as part of the pre start inspection of a paver before it goes into operation for the day or other mobile equipment conducted by equipment operators. Or they may be the occasional inspections performed on new or modified machinery, as would be typically done after a shutdown.

Bernard Rochefort Ltd equipment operators are required to perform pre-shift and post shift inspections at the beginning and end of each shift. Pre shift inspections must include all items on the pre shift list and the post shift must include all items on the post shift list (conducted during the equipment cool down period). The pre shift and post shift form is found with the other inspection documents in this binder and is also kept on site with the supervisor. Any deficiencies must be reported immediately to the supervisor. Operators must record in their log book that the inspection was completed and these logs will be collected on a monthly basis by the Health and Safety Coordinator and logged in the Inspection Binder under each equipment name. If the inspection discovered a defect that could, in turn, interfere the with safe operation of the equipment it must be recorded on the appropriate request for maintenance form and, if necessary, locked and tagged out till repairs are completed. Repairs must be completed by a certified competent mechanic or repair work reviewed and approved by a certified mechanic. The documented inspections must be kept with the equipment and machinery at all times and accessible for others to reference/view.

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Another form of pre shift inspection is the walk about of the equipment if it has been left parked for more than a very brief period. This will assist to ensure that there are no hazards or potential obstructions that may have entered the operators' blind spots during periods of inactivity. They are not recorded.

## INSPECTION SCHEDULE SUMMARY

WHAT	WHERE & WHEN	WHO	COPIES TO
<b>H&amp;S REP Monthly Inspection</b>	Office, shop and sites (one per month)	Health and Safety Rep(s) with assistance of H&S Coordinator	Health and Safety Rep Health and Safety Coordinator Safety Notice Board VP, Field Supervisor
<b>Supervisor Site Inspections</b>	On job sites on a daily (informal), weekly (formal) basis considering equipment, terrain, environment and third party, PPE and worker contacts	Site Supervisor (or President or General Manager in absence of site supervisor)	Supervisor to retain on site until project completion and then submit to Safety Coordinator
<b>Pre Shift/Start and Post shift Inspections</b>	Inspection of all heavy equipment, trucks at shift start and end, recorded on a log sheet retained by the operator	Equipment Operators prior to the start up of heavy equipment on a daily basis	Operator retains on site, copies to Health and Safety Coordinator at month end, H&S Rep, Field Supervisor and President
<b>Emergency Equipment</b>	Shop, Office, Garage, Sites Shop , garage and sites – quarterly Office Alarms at Season Start and End (May and Nov)	To be done in March, June, Sept and December by Health and Safety Representative or by Health and Safety Coordinator during shut down periods	Health and Safety Rep Health and Safety Coordinator Safety Notice Board President, Supervisor
<b>Weekly Servicing Checklist</b>	On Heavy Equipment as per checklist weekly	By Operators	Copies to mechanic at week's end
<b>PM Schedule</b>	As per the PM policy	As per the PM Policy	As per the PM policy
<b>Senior Management Inspection</b>	First week of July for first inspection and month of August for the second	President will inspect one Sudbury and one Southern site	Health and Safety Coordinator President and General Manager and posting to Safety Notice Board
<b>Weekly Sub Contractor inspection</b>	At site on sub-contractor	To be completed by supervisor	Copy to Health and Safety Coordinator
<b>Posted Materials Audit</b>	Shop/garage/site	To be completed by H&S Rep as part of monthly inspection	Copies as per Monthly inspection report
<b>WHMIS Audit</b>	Yearly	H&S Rep	WHMIS binder

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<b>PPE Audit</b>	Prior to Project start	Supervisor	H&S Coordinator

## Approval & Acknowledgement:

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Rhéaume Rochefort

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Feb 1<sup>st</sup>, 2018

Date:

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