Annual Report on Health, Safety and Environment

2016

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5/8/2017
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Executive Summary

Within the University’s Health, Safety and Environment Management System (HSEMS), a key area of focus in 2016 continued to be the renewal of existing and development of new health and safety hazard-specific programs and resources, with ongoing reinforcement of supervisor and management accountability, particularly with respect to training, risk assessment and inspections.

Compliance with annual HSEMS self-reporting improved further from 2015 to 2016, with all but two academic support units in compliance. Academic units demonstrated a 100% response rate.

In-depth reviews were conducted in eight departments, bringing the total of these to 26 over the four years since beginning this internal practice of management system monitoring. Overall improvement in health and safety practice has been observed each year, although common themes for improvement remain as identified in the previous year:

- supervisor awareness training (including faculty members)
- hazard-specific risk assessment, work procedures and worker training
- identifying root cause and corrective action through incident investigation
- inadequate processes to escalate and resolve uncorrected hazards

Following a decline in the previous year, the rate of work-related (WSIB) lost time injuries increased by 26% (27 to 34 cases) from 2015 to 2016, however the severity of injuries (days lost per injury) still decreased by 13%. This is a positive trend with similar decline over each of the past 4 years, attributed to less severe injuries and successful early and safe return to work programs. Yet, UWaterloo injury rates still remain higher than other Ontario Universities in the Workplace Safety & Insurance Board (WSIB) system. No critical injury to an employee occurred in 2016.

The University maintains compliance with legislated requirements for Joint Health and Safety Committees (JHSC) and their activities, including inspections, meetings, worker representation and certification. Contacts with regulatory agencies through inspection, directive or order have been responded to accordingly.

The University’s Emergency Response Plan is reviewed and tested annually and continues to be developed with additional supporting plans and operational resources.

Kate Windsor
Director of Safety
Safety Office
1. Introduction

Through Policy #34 – Health, Safety and Environment, the University strives to provide a safe and healthy work and educational environment for its students, employees, visitors and contractors. The University insists on compliance with legislative requirements and regulations contained in, but not limited to, the Occupational Health and Safety Act (OHSA), the Workplace Safety and Insurance Act (WSIA), the Fire Prevention and Protection Act (FPPA) and the Environmental Protection Act (EPA), and University of Waterloo policies and procedures.

To ensure that the University manages its risk in meeting legislative compliance requirements, and that the Health, Safety and Environment Management System functions properly, it is vital that the Senior Management Health and Safety Committee and Board of Governors Audit & Risk Committee review compliance and health and safety performance indicators. These measures and a summary of activities, goals and objectives are delivered through this Annual Report.
2. Health, Safety and Environment Management System (HSEMS)

2.1 Background

The University’s Health, Safety and Environment Management System (HSEMS) establishes health and safety responsibilities and practices to enable the management of its health and safety risk management activities.

2.2 Measurement within the HSEMS

2.2.1 Annual Faculty/Department Health, Safety and Environment Reports.

The University has utilized an Annual Faculty/Department Health, Safety and Environment Report for many years. This report requires self-assessment and reporting to the Safety Office from each Department Head/Chair and Health & Safety Coordinator.

Table 1:

<table>
<thead>
<tr>
<th>2015 Annual Health, Safety &amp; Environment Report</th>
<th># reporting</th>
<th>Percent Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Academic Departments</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Applied Health Sciences</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>Arts</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>Engineering</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>Environment</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>Math</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>Science</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>QNC – WIN/IQC</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td><strong>Academic Support Departments</strong></td>
<td>36/38</td>
<td>95%</td>
</tr>
</tbody>
</table>

*Report sent out to all departments of 5 or more employees

2.2.2 The Safety Office also conducts Departmental Health, Safety and Environment Reviews for selected academic and academic support departments annually. The purpose of the unit-level review is to assess whether adequate systems are in place to manage health and safety. All departments are scheduled for an initial review, and upon completion of the initial cycle a risk-based cycle will be developed to ensure that areas of greater risk are reviewed more frequently.
Table 2:

<table>
<thead>
<tr>
<th>Qualitative Rating</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Effective Process Controls in place and demonstrated throughout</td>
<td>0</td>
<td>3</td>
<td>1</td>
<td>5</td>
</tr>
<tr>
<td>Moderate Process Control or Efficiency Weaknesses Identified</td>
<td>4</td>
<td>1</td>
<td>6</td>
<td>3</td>
</tr>
<tr>
<td>Significant Control Weaknesses Identified, Impairing the Overall Effectiveness of the Department</td>
<td>0</td>
<td>2</td>
<td>1</td>
<td>0</td>
</tr>
</tbody>
</table>

Themes identified through HSEMS departmental reviews:

- **Supervisor responsibilities (OHSA s. 27)**
  - Supervisor training: completion rates of mandatory supervisor training is gradually improving, but is still incomplete. Overall, the lowest completion rates continue to be observed in the Faculty group.

- **Risk Management**
  - Hazard Assessment and Work Procedures: A major area of safety management that continues to require attention is the need to evaluate risks and implement safe work procedures to mitigate those risks. This duty arises directly out of the OHSA s.27 (2) - to advise a worker of existing or potential for danger and provide written instructions.
  - Compliance with Incident Investigation requirements and quality of investigations requires improvement. Training of individuals within departments and systematic methods of follow-up via the Safety Office were identified as areas of needed support.
  - Processes to escalate and resolve uncorrected hazards have not been clearly identified and followed in most areas.

Overall, positive shifts were observed, with departments beginning to integrate health and safety requirements into operations, particularly around onboarding of new staff, faculty and graduate students.

3. **Policy and Legislative Changes**

3.1 **Policy Changes**

3.1.1 Policy #34 – Health, Safety and Environment

Policy #34 underwent its annual review with minor housekeeping changes in 2016. The current policy can be found in Appendix A.
3.1.2 Policy #33 – Ethical Behaviour

The Policy #33 review which commenced late in 2014 is still in progress. As previously reported, compliance with the OHSA is to be incorporated into the revised policy, and the JHSC’s must be consulted for review on portions of the policy pertaining to workplace harassment.

Further considerations impacting Policy #33 arose in 2016 with the changes to the Occupational Health & Safety Act (OHSA) arising from Bill 132 – Sexual Violence and Harassment Action Plan Act. The key change arising from the Bill results in the addition of “workplace sexual harassment” to the definition of workplace harassment. The new definition must be reflected in Policy #33. Other implications arising out of Bill 132 pertain to Health & Safety Programs, and are discussed in s. 3.2.1 below.

3.2 Legislative Changes Impacting University Safety Programs

3.2.1 Occupational Health & Safety Act (OHSA)

BILL 132 – SEXUAL VIOLENCE AND HARASSMENT ACTION PLAN ACT

On September 8, 2016, Bill 132 came into force. Portions of the Bill amended the OHSA, specifically:

- The addition of “workplace sexual harassment” to the definition of workplace harassment.
- Clarifying that “a reasonable action taken by an employer or supervisor relating to the management and direction of workers or the workplace is not workplace harassment.”
- Requiring the employer to develop and maintain a written program to implement the policy with respect to workplace harassment, in consultation with the Joint Health & Safety Committee. Elements of the program must:
  - include measures and procedures for workers to report incidents of workplace harassment to a person other than the employer or supervisor, if the employer or supervisor is the alleged harasser;
  - set out how incidents or complaints of workplace harassment will be investigated and dealt with;
  - set out how information obtained about an incident or complaint of workplace harassment, including identifying information about any individuals involved, will not be disclosed unless the disclosure is necessary for the purposes of investigating or taking corrective action with respect to the incident or complaint, or is otherwise required by law;
  - set out how a worker who has allegedly experienced workplace harassment and the alleged harasser will be informed of the results of the investigation and of any corrective action that has been taken or that will be taken as a result of the investigation.
- Requiring the employer to conduct an investigation into incidents and complaints of workplace harassment, inform parties, in writing of the results.
of the investigation and of any corrective action that has been taken or that will be taken as a result of the investigation;

- Provide training on the policy and program to workers.
- Powers were provided to Ministry of Labour inspectors to order an external investigation if necessary.

As a result of the legislative changes, a written Workplace Harassment Program and updated training has been developed and approved by the JHSC.

**WHMIS 2015**

Following federal legislation which came into effect in 2015, the provincial WHMIS Regulation – (O.Reg. 860) was amended to adopt new, international standards that are part of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS). The new requirements came into effect July 1, 2016. To give workplace parties time to adjust to the new requirements, a transition period to gradually phase out the old requirements is in place until December 2018.

The amendments to the OHSA and WHMIS Regulation affect various requirements governing labels and safety data sheets for hazardous workplace chemicals. Also affected are definitions, terminology and provisions that protect confidential business information related to hazardous workplace chemicals.

During the transition period, employers must ensure workers are trained on both the old and new labels and safety data sheets for as long as both are present in the workplace.

The University's WHMIS Program was updated and approved by the JHSC in late 2016, and updated training was released in January 2016.

7052 new or existing UWaterloo employees completed WHMIS training in 2016.

**4.0 Key Health, Safety and Environment Performance Indicators**

Several indicators assist in determining the University's health and safety performance. The following indicators have been selected from both trailing and leading measures:

- Workplace Safety & Insurance Board (WSIB) Claims
- Incident Trends
- Joint Health & Safety Committees and Health & Safety Reps
- Regulatory Contacts and
- Education and Training
## 4.1 Workplace Safety & Insurance Board (WSIB) Claims

### Table 3: WSIB claims

<table>
<thead>
<tr>
<th>Work Related Reported Injuries</th>
<th>2016</th>
<th>2015</th>
<th>2014</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>FTE # Employees WSIB Insured (derived from earnings)</td>
<td>8,133</td>
<td>7,674</td>
<td>7,261</td>
<td>7,312</td>
</tr>
<tr>
<td># of Lost Time Injuries</td>
<td>34</td>
<td>27</td>
<td>40</td>
<td>26</td>
</tr>
<tr>
<td># of Critical Injuries</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Frequency Rate (LTI injuries per 100 FTE employees)</td>
<td>Waterloo</td>
<td>0.42</td>
<td>0.35</td>
<td>0.55</td>
</tr>
<tr>
<td></td>
<td>WSIB Rate Group 817: Educational Facilities</td>
<td>0.29</td>
<td>0.28</td>
<td>0.35</td>
</tr>
<tr>
<td></td>
<td>Performance Index to Rate Group</td>
<td>1.49</td>
<td>1.25</td>
<td>1.57</td>
</tr>
<tr>
<td>Days Lost During Same Calendar Year as Injury (Waterloo Data)</td>
<td></td>
<td>272.5</td>
<td>162</td>
<td>211</td>
</tr>
<tr>
<td>Severity Rate (days lost per 100 FTE employees)</td>
<td>Waterloo</td>
<td>32</td>
<td>36</td>
<td>41</td>
</tr>
<tr>
<td></td>
<td>WSIB Rate Group 817: Educational Facilities</td>
<td>19</td>
<td>19</td>
<td>28</td>
</tr>
<tr>
<td></td>
<td>Performance Index to Rate Group</td>
<td>1.68</td>
<td>1.89</td>
<td>1.46</td>
</tr>
<tr>
<td>Premium Rate per $100 Payroll</td>
<td></td>
<td>$0.36</td>
<td>$0.36</td>
<td>$0.36</td>
</tr>
<tr>
<td>WSIB Annual Assessment</td>
<td>$1,460,760</td>
<td>$1,336,080</td>
<td>$1,288,290</td>
<td>$1,217,765</td>
</tr>
<tr>
<td>Current NEER Costs</td>
<td>$1,069,119</td>
<td>$191,468</td>
<td>$428,192</td>
<td>$536,648</td>
</tr>
<tr>
<td></td>
<td>*$396,764</td>
<td>*$185,317</td>
<td>*$366,956</td>
<td>*$531,956</td>
</tr>
<tr>
<td>NEER Rebate/(Surcharge) (as of Sept. 30, 2016 Primary Adjustment 2013 - 2016 subject to adjustments)</td>
<td>n/a</td>
<td>$227,284</td>
<td>($51,878)</td>
<td>($240,393)</td>
</tr>
<tr>
<td>NEER Performance Index</td>
<td>2.13</td>
<td>0.45</td>
<td>1.13</td>
<td>1.31</td>
</tr>
<tr>
<td></td>
<td>*0.81</td>
<td>*0.43</td>
<td>*0.97</td>
<td>*1.30</td>
</tr>
<tr>
<td>Organizational Area</td>
<td># Medical Aid Injuries</td>
<td># Lost Time Injuries</td>
<td># Days Lost During Same Calendar Year</td>
<td>NEER Costs* (subject to adjustments)</td>
</tr>
<tr>
<td>Faculties (all)</td>
<td>20</td>
<td>9</td>
<td>22</td>
<td>4</td>
</tr>
<tr>
<td>Food Services</td>
<td>19</td>
<td>11</td>
<td>15</td>
<td>6</td>
</tr>
<tr>
<td>Housing</td>
<td>3</td>
<td>3</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Plant Operations - Custodial</td>
<td>4</td>
<td>12</td>
<td>5</td>
<td>4</td>
</tr>
<tr>
<td>Plant Operations - All Other Sections</td>
<td>8</td>
<td>14</td>
<td>14</td>
<td>6</td>
</tr>
<tr>
<td>All Other Academic Support Depts.</td>
<td>20</td>
<td>16</td>
<td>13</td>
<td>13</td>
</tr>
</tbody>
</table>

*Mar.31, 2017 NEER update*
The following graphs depict the University’s claims performance against our comparator Rate Group (817-Educational Facilities) in the WSIB system. Historically, UWaterloo has experienced a higher rate of injury and severity (days lost from work due to injury) than other employers in the rate group. As depicted in Figure 2 however, UWaterloo continues to realize a small but steady decline in lost time as a result of injury.

**Figure 1: WSIB Claims – Frequency of Lost Time Claims**

**Figure 2: WSIB Claims – Severity of Lost Time Claims (days lost)**

**Figure 3: WSIB Claims – Frequency of Non-Lost Time Claims**
4.2 Incident Trends

The greatest number of incidents continues to arise from slips, trips and falls primarily related to grounds conditions in adverse weather. In 2016, exposure to physical and chemicals hazards rose above musculoskeletal disorders in frequency. Activities resulting in the highest number of incidents continue to be walking, food service and cleaning.

Figure 4:

![Incident Type Chart]

- Caught between objects: 6 (1.45%)
- Exposure: 82 (19.9%)
- MSD: 47 (11.4%)
- Near Miss/Hazardous Situation: 7 (1.89%)
- Sharp: 36 (8.73%)
- Slip, Trip, Fall: 110 (26.6%)
- Struck Against: 53 (12.6%)
- Struck By: 56 (13.5%)
- Fire / Explosion: 11 (2.66%)
- Motor Vehicle Accident: 1 (0.24%)
- Other: 3 (0.72%)

Figure 5:

![Incident by Activity Chart]

- Cleaning: 48 (10.4%)
- Motor Vehicle: 5 (1.08%)
- Food Service: 89 (19.3%)
- Machinery: 3 (0.65%)
- Office Work: 24 (5.21%)
- Repetitive Body Movement: 13 (2.82%)
- Bicycle: 2 (0.43%)
- Teaching: 3 (0.65%)
- Laboratory Work: 43 (9.34%)
- Walking: 120 (26.0%)
- Manual Material Handling: 10 (2.17%)
- Shop/Studio Activities: 16 (3.47%)
- Student Project: 10 (2.17%)
- Event: 7 (1.52%)
- Overexertion: 40 (8.69%)
- Building Maintenance: 27 (5.86%)
4.3 Joint Health & Safety Committees and Health & Safety Representatives

Four (4) JHSC’s (Main, Health Sciences, Architecture and Stratford Digital Media campuses) are established and active. A Health & Safety Representative (HSR) exists at workplaces with less than 20 employees. Each committee adheres to the terms of reference and guidelines established and contain certified worker and management representatives.

JHSC’s are consulted in the review of Policy #34 and significant new or revised health and safety programs. Occupational hygiene reports (e.g. asbestos clearance testing, air monitoring), student and employee incidents and workplace inspections are presented to the JHSC for review. Minutes of the meetings are posted on the Safety Office website, and on department health and safety bulletin boards.

In 2016, the Terms of Reference for the JHSC’s was renewed and approved by the Provost. Guidelines for each JHSC were also renewed. As a result of the addition of new space on main campus over the past several years, the main campus committee expanded by three (3) worker members, one representing each employee group (Faculty, Staff and CUPE).

4.3.1 JHSC Inspections

One of the primary functions of the JHSC is to conduct workplace inspections. Satellite campuses complete monthly JHSC workplace inspections, while the main campus is entirely inspected on an annual basis.

Annually JHSC worker members conduct inspections of space occupied by the Faculties and Academic Support units. These inspections identify and correct hazards present to prevent injury and illness.

Table 4 outlines the number of hazards documented during inspections by UWaterloo’s Main Campus JHSC, the number of hazards resolved and those still outstanding at the time of this report.

Table 4:

<table>
<thead>
<tr>
<th>Year</th>
<th>Hazards Documented</th>
<th>Hazards Resolved</th>
<th>Outstanding Hazards</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013</td>
<td>984</td>
<td>858 (87%)</td>
<td>126 (13%)</td>
</tr>
<tr>
<td>2014</td>
<td>1090</td>
<td>970 (89%)</td>
<td>120 (11%)</td>
</tr>
<tr>
<td>2015</td>
<td>951</td>
<td>864 (91%)</td>
<td>90 (9%)</td>
</tr>
<tr>
<td>2016</td>
<td>705</td>
<td>646 (92%)</td>
<td>59 (8%)</td>
</tr>
</tbody>
</table>
Figure 6: Hazard Type identified during inspections.
4.4 Regulatory Contacts

Health and safety at the University is regulated through several government agencies. These include the Ontario Ministry of Labour (MoL), Ministry of Environment, Public Health Agency of Canada, Canadian Food Inspection Agency, Transport Canada and Canadian Nuclear Safety Commission. In 2016, the University was compliant with all directions and orders received from government agencies. A summary of regulatory contacts and resulting action follows:

Table 5: Regulatory Contacts

<table>
<thead>
<tr>
<th>Date</th>
<th>Government Agency</th>
<th>Reason for Contact</th>
<th>Direction/Order Issued</th>
<th>University Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>26-Jan-2016 and 28-Jan-2016</td>
<td>MoL</td>
<td>Proactive Inspections – QNC building</td>
<td>10 orders issued re: physical and chemical hazards in laboratories.</td>
<td>Orders complied with forthwith or by due date and notice of compliance submitted to MoL.</td>
</tr>
</tbody>
</table>

4.5 Education and Training

The Safety Office provides the majority of health and safety training required on campus, currently providing courses in a wide variety of health and safety topics in both online and classroom format. The following is a summary of training:

Table 6: Training

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Classroom Training Sessions</td>
<td>95</td>
<td>81</td>
<td>75</td>
<td>78</td>
<td>123</td>
</tr>
<tr>
<td>Number of Employees - All Training</td>
<td>6147</td>
<td>7296</td>
<td>13153</td>
<td>16209</td>
<td>16025</td>
</tr>
<tr>
<td>Number of Employees - Supervisor's Safety Training*</td>
<td>32</td>
<td>109</td>
<td>1453</td>
<td>1181</td>
<td>737</td>
</tr>
<tr>
<td>SO1001 – Employee Orientation (online)</td>
<td>1213</td>
<td>1764</td>
<td>3659</td>
<td>4268</td>
<td>3154</td>
</tr>
<tr>
<td>SO1100 – Supervisor Safety Awareness (online)</td>
<td>--</td>
<td>--</td>
<td>1234</td>
<td>1091</td>
<td>644</td>
</tr>
<tr>
<td>SO1003 – Supervisor and H&amp;S Coordinator Orientation</td>
<td>32 (3 sessions)</td>
<td>109 (7 sessions)</td>
<td>219 (13 sessions)</td>
<td>90 (11 sessions)</td>
<td>93 (10 sessions)</td>
</tr>
<tr>
<td>SO1007 – Inspecting the Workplace</td>
<td>23 (2 sessions)</td>
<td>54 (4 sessions)</td>
<td>70 (8 sessions)</td>
<td>71 (8 sessions)</td>
<td>54 (8 sessions)</td>
</tr>
<tr>
<td>SO1012 – Incident Investigation</td>
<td>57 (6 sessions)</td>
<td>32 (4 sessions)</td>
<td>55 (8 sessions)</td>
<td>27 (4 sessions)</td>
<td>30 (5 sessions)</td>
</tr>
<tr>
<td>SO2016 – Safe Chemical Handling</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>45 (3 sessions)</td>
<td>84 (7 sessions)</td>
</tr>
</tbody>
</table>

Page | 11
5. Safety Programs

5.1 Programs, Standard and Guidelines

The University's Health and Safety Program is comprised of programs, procedures, standards and guidelines. Below is a list of current programs:

Table 7: Current Health & Safety Programs

<table>
<thead>
<tr>
<th>Program</th>
<th>Program</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asbestos Management</td>
<td>Laser Safety</td>
</tr>
<tr>
<td>Biosafety</td>
<td>Lockout</td>
</tr>
<tr>
<td>Compressed Gas and Cryogenic Liquids</td>
<td>Nanomaterials Safety</td>
</tr>
<tr>
<td>Chemical Safety</td>
<td>Personal Protective Equipment</td>
</tr>
<tr>
<td>Confined Space</td>
<td>Radiation Safety</td>
</tr>
<tr>
<td>Electrical Hazards</td>
<td>Respiratory Protection</td>
</tr>
<tr>
<td>Ergonomics</td>
<td>Return to Work</td>
</tr>
<tr>
<td>Fieldwork</td>
<td>Working At Heights</td>
</tr>
<tr>
<td>Fire Safety</td>
<td>Workplace Hazardous Materials Information System (WHMIS)</td>
</tr>
<tr>
<td>First Aid</td>
<td>Workplace Harassment</td>
</tr>
<tr>
<td>Hazard Recognition and Control</td>
<td>Workplace Inspections</td>
</tr>
<tr>
<td>Incident Management</td>
<td>Workplace Violence Prevention</td>
</tr>
<tr>
<td>Laboratory Safety</td>
<td>X-ray Safety</td>
</tr>
</tbody>
</table>

5.2 Laboratory Safety Committee

The Laboratory Safety Committee's (LSC) overall responsibility is to monitor the use of radionuclides, biohazardous materials, chemicals, lasers, x-rays and other safety issues related to teaching and research laboratories. The Committee is advisory to the Vice-President, University Research, and to the Safety Office and provides the following functions:

- Oversee strategies to ensure ongoing and adequate surveillance, hazard identification, and risk evaluation of laboratory related activities
- Assess requirements for laboratory users training and laboratory safety procedures. Recommends revisions, when indicated
- Review reports related to laboratory safety services, activities, incidents, and interventions in laboratory areas. Recommend corrective actions when indicated.
- Maintain subcommittees based on areas of expertise to receive, review and approve reports and applications required by legislation and regulatory agencies

In 2016, the committee engaged in the following activities:
1) Review and approval of research laboratory permits via subcommittee;
2) Review of committee mandate, meeting frequency and activities;
3) Consultation on new and revised laboratory safety programs;
4) Consultation on incident investigations; and
5) Consultation on Medical Device Risk Assessments, where devices are modified or built in the research environment. This requirement has now been embedded in Office of Research Ethics approval process.

5.3 Emergency Plan

Waterloo’s Emergency Plan underwent annual review in 2016. Activities conducted surrounding implementation of the plan include:

- Tabletop Exercise conducted with the Emergency Control Group (ECG).
- A scribe role within the Emergency Operations Centre was developed and individuals trained in this function.
- Emergency Notification System and WatSAFE integration completed.
- “Run, Hide, Fight” training video released to campus community. Emergency Procedures updated and distributed to all units and classrooms.

5.4 Hazardous Waste Disposal and Environmental Safety Facility (ESF)

The Safety Office is responsible for University conformance to hazardous materials related legislated requirements. These include Environmental Protection Act, Water Resources Act, Hazardous Products Act, Occupational Health and Safety Act, Nuclear Safety and Control Act, Municipal By-laws, Controlled Drug and Substance Act and Transportation of Dangerous Goods Act.

The Safety Office administers Waterloo’s hazardous materials program and operates the ESF. Regular review of operations and associated costs continue to support the continuation of an internally-managed program versus contracting out to third party.

Table 8: Hazardous Waste Disposal and Cost

<table>
<thead>
<tr>
<th>Year</th>
<th>Fluorescent Lamps ($)</th>
<th>PCB’s ($)</th>
<th>Biological Waste</th>
<th>Chemical Waste</th>
<th>Annual Disposal Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td># pieces</td>
<td>kg</td>
<td>kg</td>
</tr>
<tr>
<td>2012/13</td>
<td>n/a*</td>
<td>$6,747</td>
<td>1032</td>
<td>9644</td>
<td>3826</td>
</tr>
<tr>
<td>2013/14</td>
<td>$2,583</td>
<td>$19,751</td>
<td>1070</td>
<td>9744</td>
<td>3518</td>
</tr>
<tr>
<td>2014/15</td>
<td>$7,891</td>
<td>$7,544</td>
<td>1072</td>
<td>9601</td>
<td>5162</td>
</tr>
<tr>
<td>2015/16</td>
<td>$8,153</td>
<td>$2,572</td>
<td>1037</td>
<td>9937</td>
<td>5721</td>
</tr>
<tr>
<td>2016/17</td>
<td>$10,761</td>
<td>$5,216</td>
<td>962</td>
<td>8427</td>
<td>7421</td>
</tr>
</tbody>
</table>

*Fluorescent lamp recycling initiated in 2014.
6.0 Strategic Goals and Objectives

6.1 2016 Goals and Objectives Status

<table>
<thead>
<tr>
<th>Objective</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Program development/annual review - 2016 objectives:</td>
<td></td>
</tr>
<tr>
<td>o Contractor Safety</td>
<td>In progress</td>
</tr>
<tr>
<td>o Confined Space</td>
<td>Complete</td>
</tr>
<tr>
<td>o Electrical Safety</td>
<td>In progress</td>
</tr>
<tr>
<td>o Ergonomics</td>
<td>Complete</td>
</tr>
<tr>
<td>o Fieldwork</td>
<td>Deferred</td>
</tr>
<tr>
<td>o Incident Management</td>
<td>Complete</td>
</tr>
<tr>
<td>o Lock-out/Control of Hazardous Energy</td>
<td>In progress</td>
</tr>
<tr>
<td>o Radiation Safety</td>
<td>Deferred</td>
</tr>
<tr>
<td>o Training</td>
<td>Deferred</td>
</tr>
<tr>
<td>o Working At Heights</td>
<td>Complete</td>
</tr>
<tr>
<td>o Workplace Violence Prevention</td>
<td>Complete</td>
</tr>
<tr>
<td>o WHMIS</td>
<td>Complete</td>
</tr>
<tr>
<td>b) Implement campus-wide laboratory chemical inventory system – eRPortal</td>
<td>Ongoing – to date 83 labs have active inventory</td>
</tr>
</tbody>
</table>
| c) Transition of online safety training to LEARN and improved records access | 1. Employee Safety Orientation: complete.  
   2. Training record reporting improved to reflect individuals who have not completed mandatory training. |
| d) Implementation of Emergency Planning activities, including update of Lockdown procedures and release of training video | Complete |

6.2 2017 Goals and Objectives

a) Program development/annual review - 2017 objectives:
   i. Contractor Safety
   ii. Electrical Safety
   iii. Lock-out/Control of Hazardous Energy
   iv. Fieldwork
   v. Radiation Safety
   vi. Training
   vii. Fire Safety
b) Commence a comprehensive review of training, including competencies, gaps, needs, modes and resourcing.
c) Continue transition of online courses to LEARN.
e) Develop Health & Safety Coordinator Orientation and communications.
Appendix A

Policy 34 – Health, Safety and Environment

Established: 7 January 1970
Revised: 14 November 2016
Mandatory Review Date: November 2017
Supersedes: N/A
Class: G
Responsible/Originating Department: Safety Office
Executive Contact: University Secretary

Related Policies, Guidelines and Procedures:
Policy 11 – University Risk Management
Policy 21 – Alcohol Use and Education
Policy 22 – Regulations Governing the Installation of Equipment in University Buildings
Policy 29 – Smoking
Policy 33 – Ethical Behaviour
Policy 35 – Firearms
Policy 60 – University of Waterloo Emergency Response
Safety Guidelines for Field Work
Safety in Student Abroad Programs
Travel Requirements
Weather Closing Guidelines

See also the policies and procedures posted on the Safety Office website.

1. Introduction

The University of Waterloo is committed to the prevention of illness and injury and strives to provide a safe work and study environment for its employees, students and visitors. The policy is a key component of the University’s Health, Safety and Environment Management System.

2. Scope

This policy applies to all University employees, students and visitors on University Property or participating in University Events. With the exception of section 6.4.2, this policy does not apply to construction projects on University Property where the University is not the constructor or employer, as defined under the Act (defined below).

3. Legal Framework

In addition to the abovementioned “Related Policies, Guidelines and Procedures”, the policy will be construed in accordance with applicable law, in particular, the Occupational Health and Safety Act, R.S.O. 1990, c. O.1 (the "Act"). Other applicable law includes:

- Environmental Protection Act, R.S.O. 1990, c. E.19
- Hazardous Products Act, R.S.C., 1985, c. H-3
- Health Protection and Promotion Act, R.S.O. 1990, c. H.7
- Pest Control Products Act, S.C. 2002, c. 28
If any of these legal provisions are modified, abrogated, superseded, or added to, the policy will be interpreted in accordance with the new legal framework.

4. Purpose

The objective of this policy is to promote health and safety on University Property and at University Events, as required by applicable law.

5. Principles

The following principles guide this policy:

- The health and safety of individuals is of the utmost concern in every area of University operations.
- The University will comply, and expects its employees, students and visitors to comply with applicable legislation governing health and safety.
- The University will not tolerate violence on University Property or at University Events.
- University employees, students and visitors are expected to take responsibility for their own safety and actions, and the impact of those actions on others.
- University employees, students and visitors are expected to be proactive about reporting situations that impact health and safety on University Property or at University Events.

6. General Roles, Responsibilities and Procedures

6.1. University

6.1.1. The University will take every precaution reasonable in the circumstances to protect the health and safety of its employees, students and visitors.

6.1.2. The University will comply with applicable legislation governing health and safety, including, without limitation, ensuring that this policy is reviewed on an annual basis and posted as required under the Act.

6.1.3. The University will develop, maintain and communicate a health and safety program, internal standards and procedures to implement this policy, and ensure that employees receive necessary information, instruction and supervision to protect their health and safety.

6.1.4. The University will provide reasonable assistance and co-operation to the Joint Health and Safety Committees to enable them to carry out their work.

6.2. Director of Safety and Joint Health and Safety Committees

6.2.1. The director of safety or designate is empowered to deal with dangerous circumstances, having the authority to stop any process or procedure, or to require the correction of any condition that contravenes the Act.

6.2.2. The director of safety and Joint Health and Safety Committees will identify health and safety concerns and seek to have these addressed by members of the University community acting through established University channels. When a health and safety concern cannot be solved in this manner it will be reported in writing by the director of safety or Joint Health and Safety Committee to the senior administrator accountable for the area, usually with a recommendation. The senior administrator’s decision shall be communicated in writing to the director of safety.

6.3. Supervisors

6.3.1. Supervisors must provide for the health and safety of employees under their authority, including training in specific work tasks, and must take necessary measures to comply with environmental requirements.
6.3.2. Supervisors will inform themselves of and comply with their duties under the Act and other applicable legislation governing health and safety, as well as University policies, guidelines and procedures.

6.3.3. Supervisors will promptly investigate and take corrective action, as necessary, upon identification of a hazard or receipt of a report from a worker re: conditions that are contrary to good health, safety or environmental practices or that contravene any legislative requirements.

6.3.4. If an employee under a supervisor’s authority refuses work or an assignment for reasons of safety, the supervisor will promptly investigate and take necessary corrective action.

6.3.5. In the event an employee under a supervisor’s authority is injured or becomes ill as a result of a work assignment, the supervisor will ensure that prompt first aid and health care treatment is obtained, if necessary and that University reports are completed by the end of the business day following the incident.

6.3.6. Supervisors will post this policy and other health, safety and environment program information provided by the Safety Office in a conspicuous location.

6.3.7. Supervisors should consult the Safety Office website or contact the Safety Office for further information in exercising their responsibilities under this policy and applicable legislation.

6.3.8. This section applies to a student where the student’s research (laboratory, field or other) for academic credit is conducted under the direct supervision of a University employee. In these circumstances, the references to employee in this section will be read as references to the student and the references to the supervisor in this section will be read as references to the University employee who is supervising the student’s research.

6.4. Employees, Students and Visitors.

6.4.1. University employees, students and visitors will comply with applicable legislation, University policies, guidelines and procedures, and additional directions from the University or a University employee in a position of authority, with respect to health and safety.

6.4.2. In addition to any other applicable terms, contractors, subcontractors and their employees undertaking work for the University must comply with the terms of their contracts and all applicable laws with respect to health, safety, conduct and the protection of the environment.

6.4.3. University employees, students and visitors have primary responsibility for their safety and actions and for the impact of their actions on others.

6.4.4. Subject to Section 6.4.5, University employees, students and visitors shall promptly report conditions that are contrary to good health, safety or environmental practices or that contravene any legislative requirements to their supervisor or another University employee in a position of authority. If the employee, student or visitor making a report does not see evidence of investigations being commenced or remedial actions being taken within a reasonable period of time, the employee, student or visitor shall report the situation to the director of safety or a Joint Health and Safety Committee member.

6.4.5. University employees, students and visitors shall report unsafe buildings and grounds conditions on University Property to Plant Operations.
6.4.6. Employees may refuse work or an assignment for reasons of safety without prejudice or fear of reprisal. Employees should consult the Safety Office website or the Act for more guidance on the process for refusing unsafe work in accordance with the Act.

6.4.7. University employees, students and visitors will take reasonable steps to minimize the impact of University operations on the environment and respond diligently to incidents arising from University activities which could have an adverse impact on the environment.

7. Roles, Responsibilities and Procedures Regarding Workplace Violence

7.1. The University is committed to maintaining a working and learning environment that is violence free. The University strives to assess and minimize the risk of violence, and to ensure that reasonable safeguards are in place to protect employees, students and visitors from incidents of violence on University Property and at University Events.

7.2. The University has implemented a Workplace Violence Prevention Program, which includes measures and procedures to protect employees, students and visitors from workplace violence, a means of summoning immediate assistance and a process for employees, students and visitors to report incidents or raise concerns. As part of this program, the University is committed to ensuring that employees, students, supervisors and other University employees in positions of authority have the appropriate information and instruction to protect them from violence in the workplace.

7.3. All employees, students and visitors have a responsibility in maintaining a violence free working and learning environment by not engaging in acts of violence, and are required to report incidents promptly as outlined in the University’s Workplace Violence Prevention Program. Individuals should consult the Safety Office website or contact the Safety Office for more information on this program.

7.4. Any act of violence is unacceptable conduct that will not be tolerated. Anyone engaging in activities or behavior found to be of a violent or threatening nature will be subject to disciplinary and other sanctions up to and including termination of employment, expulsion and ban from University premises. Criminal or civil proceedings may also be initiated.

7.5. The University recognizes that domestic violence can pose a risk to members of the University community, and will take reasonable precautions to protect its members from the risk of domestic violence in the workplace.
Appendix A
Definitions

In this policy, the following terms shall have the following meanings:


“domestic violence” has the same meaning as violence, except that the perpetrator and victim are or were in a personal relationship, such as a spouse or former spouse, current or former intimate partner or a family member.

“employee” has the same meaning given to the term "worker" under the Act, where the employer is the University.

“Joint Health and Safety Committee” means the University committee established to fulfill the responsibilities of a committee, as defined under the Act.

“senior administrator” means the president, vice-presidents and university secretary and general counsel.

“student” means individuals registered as undergraduate or graduate students at the University. For the purposes of this policy, a student will be an employee where they meet that definition and are acting within the course of employment.

“supervisor” means a person who has charge of a workplace or authority over a worker.

“violence” means,
   a) the exercise of physical force by a person against a worker, student or visitor on University Property or at a University Event, that causes or could cause physical injury to the worker, student or visitor;
   b) an attempt to exercise physical force against a worker, student or visitor on University Property or at a University Event, that could cause physical injury to the worker, student or visitor; or
   c) a statement or behaviour that it is reasonable for a worker, student or visitor to interpret as a threat to exercise physical force against the worker, student or visitor, on University Property or at a University Event, that could cause physical injury to the worker.

The definition of violence includes domestic violence.

“visitor” means anyone attending on University Property or at a University Event who is not a student or worker. For the purposes of this policy, “visitor” does not include contractors, subcontractors or their employees while onsite at a construction project for which the University is not the constructor or employer as defined under the Act.

“University” means the University of Waterloo.

“University Events” means activities or events on or off University Property, which are organized by the University and under the control of University employees.

“University Property” means all real property owned and under the operational control of the University, except that, in the case of employees, University Property will have the same meaning as the term workplace, as defined in the Act.

1 Note: this definition is the same as the definition of “supervisor” in the Act. The University may revise this definition from time to time to maintain consistency with the Act and will notify the community of such revisions.

2 Note: this definition of “violence” is based on the definition of workplace violence under the Act. The University may revise this definition from time to time to maintain consistency with the Act and will notify the community of such revisions.
Appendix B

Health, Safety and Environment Management System

GENERAL PRINCIPLES
The University of Waterloo’s Health, Safety, Environment Management System (HSEMS) provides the framework to enable University compliance with health, safety and environment legislation. Specifically, it apprises members of the campus community of their duties and responsibilities with respect to these acts, UWaterloo’s relevant policies, and collateral procedural and reporting requirements.

The University’s HSEMS supports the management of Health, Safety and Environment (HSE) by ensuring:

- Maintenance and implementation of a policy on Health, Safety and Environment
- Compliance with HSE legislation
- Provision of centralized Health, Safety and Environment programs, standards, and services
- Guidance to faculty/department Health, Safety and Environment programs
- Monitoring and auditing of HSE
- Support for the activities of health and safety committees

The University has a general duty to "take every precaution reasonable in the circumstances for the protection of a worker" (OHSA) as well as a duty to put in place a proper system to prevent the occurrence of offences under the legislation and to take reasonable steps to ensure the effective operation of that system (Supreme Court of Canada).

1.1 POLICY 34: HEALTH, SAFETY AND ENVIRONMENT

Key to the HSEMS is UWaterloo Policy 34: Health, Safety and Environment, which states:

The University of Waterloo strives to provide a safe, healthy work and educational environment for its students, employees, visitors and contractors. The University insists on compliance with legislative requirements and regulations contained in, but not limited to, the Occupational Health and Safety Act, the Workplace Safety and Insurance Act, the Fire Prevention and Protection Act and the Environmental Protection Act, and University of Waterloo policies and procedures.

1.2 INTERNAL RESPONSIBILITY SYSTEM

Each faculty member, staff member, student, visitor and contractor has the primary responsibility for their own safety and actions, and for others affected by their actions. Supervisors and all other persons in authority must provide for health and safety of those under their authority, including training in specific work tasks and must take necessary measures to comply with environmental requirements.

1.3 MANAGEMENT OF CHANGE

Management of change is defined as a process to evaluate and manage any modifications to the design, control, or operations (including staffing) of a workplace activity, before any change is implemented.

Its purpose is to ensure that:

- No unintended hazards are introduced
- Risks are properly evaluated and minimized
- Update hazard analyses and controls, including standard operating procedures and training

As part of the process of identifying, monitoring, assessing and controlling risks and hazards in areas under their control, department directors/chairs/heads and supervisors must anticipate, prior to
making any modification or introduction of new work methods, materials, processes, machinery or equipment in the workplace, the potential impact of the change on the health and safety of students, employees or other persons.

2. ROLES AND RESPONSIBILITIES

2.1 UNIVERSITY

Directors and officers of UWaterloo are required to take all reasonable care to ensure University compliance with legislation and orders/requirements of HSE officials. For the purposes of HSE legislation and UWaterloo HSE Policy:
- Directors are members of Board of Governors
- Officers are the President and Vice-President, Academic & Provost and all direct reporting managers to the President and the Provost

2.2 AUDIT COMMITTEE

The Board of Governors Audit Committee annually reviews UWaterloo’s report on compliance with HSE legislation. Additional reports may be presented to the Audit Committee where circumstances require the Audit Committee to carry out responsibilities pursuant to applicable legislation, on behalf of the Board of Governors.

2.3 VICE-PRESIDENT, ACADEMIC, & PROVOST

- Approves university policies and other actions necessary to comply with legislative requirements including OHSA, FPPA and EPA; and
- Responds to recommendations of a Joint Health and Safety Committee and Director of Safety.

2.4 SECRETARY OF THE UNIVERSITY

- Oversees and supports the work of the Director of Safety with respect to design, implementation and maintenance of UWaterloo’s Health, Safety and Environment Program;
- Reviews and presents to the Board of Governors Audit Committee an annual report on HSE compliance;
- Establishes and maintains a procedure to identify legal requirements and periodically evaluate compliance with these requirements; and
- Reports to the President and/or Provost:
  - Where there is not full and timely compliance with an order issued by the relevant Ministry or regulatory agency; or
  - Any significant event which requires Board of Governors Audit Committee attention.

2.5 OFFICERS OF THE UNIVERSITY

Officers of the University, as defined in Section 2.1 are accountable to the Board of Governors for directing health, safety and environment activities within their areas and providing appropriate financial, human, and organizational resources to plan, implement, check, review, and correct the HSEMS. Specifically, this includes:
- Ensuring that UWaterloo’s Health, Safety and Environment Policy and Program is implemented; and
- Defining roles, assigning responsibilities, establishing accountability, delegating authority and ensuring that annual performance reviews address how subordinates have carried out their responsibilities for managing HSE.
- Maintaining a Senior Management Health and Safety Committee as appointed by the Vice-President, Academic, & Provost. The Committee is responsible for advising, at least annually, the Officers of the University on the overall health and safety performance of the University. The Committee shall identify and prioritize action plans, as well as new objectives and targets to facilitate continuous improvement of the HSE program.
- In performing its duties the Committee shall review:
  - HSE performance to established objectives and targets;
Periodic reports from Director of Safety on the HSE Program, which includes an assessment of faculty/departmental compliance with the HSEMS;
- Results of Safety Office department reviews and legal developments or other circumstances impacting overall risk management.

2.6 ACADEMIC AND ACADEMIC SUPPORT DIRECTORS/CHAIRS/HEADS

Academic and academic support department directors/chairs/heads are accountable to the officers of the University and are given authority to exercise management functions. In carrying out HSE duties on behalf of the University, directors/chairs/heads are required to:
- Appoint competent supervisors
- Provide for information, instruction, supervision and training to enable students, faculty and staff to safely perform their tasks
- Establish and maintain measures to identify, monitor, assess and control risks and hazards according to the HSE Program; including Job Hazard Analysis, Standard Operating, Inspection and Incident Investigation Procedures
- Maintain appropriate records to demonstrate compliance with their duties and obligations
- Take corrective action, including discipline, where a member of the campus community is found or reported to be in an unsafe condition
- Review the Annual Faculty/Department Health, Safety and Environment Report (see 2.7 below) according to UWaterloo’s Health, Safety and Environment Program to ensure the faculty/department is meeting its obligations with respect to the HSEMS and submit to the Director of Safety
- Assisting the Director of Safety or designate with conducting a periodic comprehensive Health, Safety and Environment review.

2.7 FACULTY/DEPARTMENT HEALTH AND SAFETY COORDINATORS/COMMITTEES

Management may establish faculty/department health and safety coordinators/committees to coordinate health and safety activities and advise department directors/chairs/heads on health and safety matters on an ongoing basis. Such coordinators/committees should be designated person(s) who will communicate their findings to department directors/chairs/heads. In the absence of coordinators/committees, the department directors/chairs/heads assume these responsibilities. Faculty/department health and safety coordinators/committees are responsible to their management for:
- Making recommendations concerning procedures and regulations addressing UWaterloo’s Health, Safety and Environment Program
- Completing the Annual Faculty/Department Health, Safety and Environment Report according to UWaterloo’s Health, Safety Environment Program
- Assisting with and/or conducting inspections and incident investigations in their area
- Ensuring that health and safety concerns are addressed by:
  - Taking appropriate action as a co-ordinator/committee
  - Referral to the appropriate department manager for action
  - Referral to the Safety Office and/or a Joint Health and Safety Committee

2.8 RESEARCHERS, FACULTY AND SUPERVISORS

Every person in a supervisory position is responsible to his/her line of authority for:
- Taking every reasonable precaution to protect and promote the health, safety and environment of those persons reporting directly and indirectly to them
- Ensuring that persons work in an appropriate manner, with the equipment, protective devices, measures and procedures required
- Advising persons of the existence of potential or actual danger to their health or safety
- Fulfilling the requirements of the UWaterloo’s Health, Safety and Environment Program
- Ensuring that required job-specific training in areas and operations under their control is identified through hazard assessment and provided to all employees, and that records of training are maintained
• Promptly investigating and reporting all workplace incidents and taking any appropriate corrective action
• Ensuring their work area is inspected on a monthly basis
• Completing mandatory supervisory HSE training

2.9 SUPERVISORS OF CONTRACTORS AND SUB-CONTRACTORS
Any employee of the University who is responsible for hiring or overseeing a contractor or subcontractor to perform work within the University must ensure that:
• Contract documents incorporate the applicable requirements under UWaterloo’s Health, Safety and Environment Policy and Program
• Relevant information relating to UWaterloo’s workplace hazards are communicated to the contractor
• Compliance with the UWaterloo’s Health and Safety Policy and Program is monitored and enforced

2.10 WORKERS, STUDENTS AND OTHER PERSONS
All persons on University premises, whether for monetary compensation or for educational or other purposes, are responsible for:
• Complying with HSE legislation and UWaterloo’s Health, Safety and Environment Policy and Program
• Using or wearing the appropriate equipment, protective devices or clothing
• Reporting promptly any hazardous condition or injury to his/her supervisor
• Refraining from any activity that may endanger the health and safety of themselves or of any other person
• Completing all training that applies to their job. Workers may be required to demonstrate their level of understanding of training through the completion of tests, quizzes and/or task observation

2.11 SAFETY OFFICE
The Safety Office serves as a HSE resource to assist members of the University community in meeting their obligations to provide a safe, healthy work and educational environment. In particular, the Safety Office:
• Develops and reviews UWaterloo’s Health, Safety and Environment programs
• Provides advice, assists faculty/departmental health and safety co-ordinators/committees
• Administers, serves on or is a resource to UWaterloo’s HSE committees
• Monitors departmental and Joint Health and Safety Committee (JHSC) inspections
• Follows up on incidents as appropriate and monitors preventive and corrective actions
• Conducts periodic review of departmental HSE programs
• Acts a resource for the provision of training for all employees, and is responsible for determining training needs at least annually, providing training or train-the-trainer sessions as required, and retaining all HSE training records

The Director of Safety is responsible for:
• Directing the effective, efficient, and comprehensive delivery of assigned health, safety and environmental program services to support the achievement of the University’s strategic goals, facilitate successful endeavours by all members of the University community and ensure that persons accountable for University operations are informed of risks and compliance requirements
• Preparing reports on UWaterloo’s Health, Safety and Environment Program, which includes an assessment of faculty/departmental compliance with the HSEMS for the Senior Management Health and Safety Committee
• Duly informing officers and department directors/chairs/heads of their accountability and responsibility under the Occupational Health & Safety Act and regulations, Policy #34 and this management system
• Informing and advising the Secretary of the University on any instances where, pursuant to the legislation:
  o Ministry or regulatory agency issues an order and there is not full compliance within the specified time
  o Employee(s) refuse(s) to work for reason of danger to their health or safety
  o Decision is taken to not implement a recommendation of a Joint Health and Safety Committee
  o Circumstances require the Board of Governors Audit Committee to be informed so they may carry out responsibilities pursuant to applicable legislation, on behalf of the Board of Governors

Revision approved by the Vice President, Academic & Provost, June 20, 2013.