Annual Report on Health, Safety and Environment

2017

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Executive Summary

Positive shifts in performance and improved engagement in health and safety continue to be seen across University departments and for the campus as a whole. Key efforts that fostered this in 2017 were senior management attention to hazard control, better support for the departmental health and safety coordinator role, improved incident management practices, and more frequent communication to stakeholders.

The Safety Office continued to monitor the Health, Safety and Environment Management System (HSEMS) by conducting in-depth reviews, and engaged four academic support units and two entire faculties this year. We continue to see overall improvement, particularly in the areas of incident management and hazard control, safety orientation, and communication. Two common themes for improvement remain as identified in previous years, and therefore are key priorities for 2018:

- Faculty member compliance with supervisor awareness training requirements
- Hazard-specific risk assessment, work procedures and worker training

Notably, 2017 marked the first year in which UWaterloo experienced a lower rate of injury than other employers in the rate group. Both lost time and non-lost time injuries decreased from 2016 by 35%. While severity (days lost from work due to injury) is still slightly higher than the rate group, another reduction of 6% from the 2016 rate occurred. This rate has steadily declined over each of the past five years. Five critical injuries to an employee occurred in 2017, and one fatality was registered to the University as a result of a long-latency asbestos-related occupational illness of a retiree.

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 continues to mature, with ongoing testing of emergency control and notification systems. Progress is being made on the completion of support plans, with the Pandemic and Emergency Communications plans now in place.

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), 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. This Annual Report delivers these measures and a summary of activities, goals and objectives.
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: Annual Health, Safety & Environment Report

<table>
<thead>
<tr>
<th># Reporting</th>
<th>Percent Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Academic Departments</strong></td>
<td></td>
</tr>
<tr>
<td>Applied Health Sciences</td>
<td>100%</td>
</tr>
<tr>
<td>Arts</td>
<td>100%</td>
</tr>
<tr>
<td>Engineering</td>
<td>100%</td>
</tr>
<tr>
<td>Environment</td>
<td>100%</td>
</tr>
<tr>
<td>Math</td>
<td>100%</td>
</tr>
<tr>
<td>Science</td>
<td>100%</td>
</tr>
<tr>
<td>QNC – WIN/IQC</td>
<td>100%</td>
</tr>
<tr>
<td><strong>Academic Support Departments</strong></td>
<td>41/42</td>
</tr>
<tr>
<td></td>
<td>98%</td>
</tr>
</tbody>
</table>

2.2.2 Departmental Health, Safety and Environment Reviews

The Safety Office also conducts annual Departmental Health, Safety and Environment Reviews for selected academic and academic support departments. The purpose of the unit-level review is to assess whether adequate systems are in place to manage health and safety.
Table 2: Departmental Health, Safety and Environment Review Results

<table>
<thead>
<tr>
<th>Qualitative Rating</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</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>
<td>4</td>
</tr>
<tr>
<td>Moderate Process Control or Efficiency Weaknesses Identified</td>
<td>4</td>
<td>1</td>
<td>6</td>
<td>3</td>
<td>2</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>
<td>0</td>
</tr>
</tbody>
</table>

Themes identified through HSEMS departmental reviews:

- **Supervisor responsibilities (OHSA s. 27)**
  - Supervisor training: the completion rates of mandatory supervisor training are gradually improving, but still incomplete, particularly within the Faculty employee group.

- **Risk Management**
  - Hazard Assessment and Work Procedures: Completion of job hazard analysis is gaining traction in academic support units – efforts to integrate these into training and hazard control will be a focus moving forward. Risk assessment in research however continues to require greater attention, so that hazards are understood, controls are put into place and safe work procedures operationalized.
  - Compliance with Incident Investigation requirements and the quality of investigations has improved with the development of new tools and internal processes in 2017.
  - Processes to escalate and resolve uncorrected hazards have improved with the support of senior management.

3. Policy and Legislative Changes

3.1 Policy Changes

3.1.1 Policy #34 – Health, Safety and Environment

Policy #34 (Appendix A) underwent its annual review with no changes in 2017.

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 should be consulted for review on portions of the policy pertaining to workplace harassment.
3.2 Legislative Changes Impacting University Safety Programs

3.2.1 Occupational Health & Safety Act (OHSA)

BILL 177 – STRONGER, FAIRER ONTARIO ACT (BUDGET MEASURES)
Passed in 2017, the Stronger, Fairer Ontario Act (Budget Measures) resulted in several changes to the OHSA. The following changes are applicable to the University:

   a) Increase the maximum fine under section 66 of the Act payable by a person upon conviction of an offence under the Act:
      i. Corporations are now liable to a maximum fine of $1,500,000 per charge (increased from $500,000 per charge); and
      ii. Individuals, including a supervisor, worker, director or officer, are now exposed to a maximum fine of $100,000 per charge for a contravention of the OHSA (increased from $25,000). This could be in addition to a potential jail term – the maximum term of which has not changed.

   b) Amend the limitation period for bringing a prosecution under the Act or the regulations:
      i. The limitation period for bringing a prosecution under the OHSA has, historically, been one year from the date of the alleged contravention. The limitation period has been lengthened to include the day upon which an Inspector becomes aware of the alleged offence. This means, if an Inspector becomes aware of an alleged contravention of the OHSA or its regulations, even if it occurred more than one year ago and even before this historic change, a charge could be investigated and laid within one year of the Inspector discovering the contravention.

OCCUPATIONAL EXPOSURE LIMIT (OELs)

   a) Regulation 833 (Control of Exposure to Biological or Chemical Agents) and O. Reg. 490/09 (Designated Substances) were amended to reflect the adoption of new or revised occupational exposure limits (OELs) for 21 chemical substances:
      i. Addition of specific listings for 4 substances in regulation: Cyanogen bromide, Ethyl isocyanate, Peracetic acid and Phenyl isocyanate
      ii. Revisions to exposure limits or listings for 17 substances currently regulated: Acetone, Atrazine, Barium sulfate, 1-Bromopropane, Ethylidene norbornene, Lithium hydride, Methomyl, Methyl formate, Methyl isocyanate, Naphthalene, Nickel carbonyl, Oxalic Acid, Pentachlorophenol, Pentane, and Trichloroacetic acid, 1,2,3 – Trichloropropane, and Triethylamine

WHMIS 2015
Following federal legislation that 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.

During the transition period, employers must ensure workers are trained on both old and new labels as well as safety data sheets for as long as both are present in the workplace. In 2017, the Safety Office’s focus continued to be on ensuring employees and students complete the new WHMIS 2015 training. In 2017, 9,448 (2,572 employees & 6,876 students) completed WHMIS 2015 training.

In late 2017, the JHSC reviewed and approved the University’s WHMIS Program to which there were no substantial changes.

4. 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>Calendar Year</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>FTE # Employees WSIB Insured (derived from earnings)</td>
<td>7,261</td>
<td>7,674</td>
<td>8,133</td>
<td>8,373</td>
</tr>
<tr>
<td># of Lost Time Injuries</td>
<td>40</td>
<td>27</td>
<td>34</td>
<td>22</td>
</tr>
<tr>
<td># of Critical Injuries</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>5</td>
</tr>
<tr>
<td>Frequency Rate (LTI injuries per 100 FTE employees)</td>
<td>Waterloo</td>
<td>0.55</td>
<td>0.35</td>
<td>0.43</td>
</tr>
<tr>
<td>WSIB Rate Group 817: Educational Facilities</td>
<td>0.37</td>
<td>0.29</td>
<td>0.30</td>
<td>0.32</td>
</tr>
<tr>
<td>Performance Index to Rate Group</td>
<td>1.57</td>
<td>1.25</td>
<td>1.49</td>
<td>0.94</td>
</tr>
<tr>
<td>Days Lost During Same Calendar Year as Injury (Waterloo Data)</td>
<td>211</td>
<td>162</td>
<td>272.5</td>
<td>187</td>
</tr>
<tr>
<td>Severity Rate (days lost per 100 FTE employees)</td>
<td>Waterloo</td>
<td>41</td>
<td>36</td>
<td>32</td>
</tr>
<tr>
<td>WSIB Rate Group 817: Educational Facilities</td>
<td>28</td>
<td>19</td>
<td>19</td>
<td>19</td>
</tr>
<tr>
<td>Performance Index to Rate Group</td>
<td>1.46</td>
<td>1.89</td>
<td>1.68</td>
<td>1.58</td>
</tr>
<tr>
<td>Premium Rate per $100 Payroll</td>
<td>$0.36</td>
<td>$0.36</td>
<td>$0.36</td>
<td>$0.36</td>
</tr>
<tr>
<td>WSIB Annual Assessment</td>
<td>$1,288,290</td>
<td>$1,336,080</td>
<td>$1,422,348</td>
<td>$1,533,880</td>
</tr>
<tr>
<td>Current NEER Costs</td>
<td>$184,684</td>
<td>$191,468</td>
<td>$347,060</td>
<td>$640,644</td>
</tr>
<tr>
<td>NEER Rebate/(Surcharge) (as of Sept. 30, 2017 Primary Adjustment 2013 - 2016 subject to adjustments)</td>
<td>($51,878)</td>
<td>$227,284</td>
<td>$131,197</td>
<td>n/a</td>
</tr>
<tr>
<td>NEER Performance Index</td>
<td>0.95</td>
<td>0.43</td>
<td>0.71</td>
<td>1.14</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Organizational Area</th>
<th># Medical Aid Injuries</th>
<th># Lost Time Injuries</th>
<th># Days Lost During Same Calendar Year</th>
<th>NEER Costs* (subject to adjustments)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Faculties (all)</td>
<td>22</td>
<td>9</td>
<td>20</td>
<td>11</td>
</tr>
<tr>
<td>Food Services</td>
<td>15</td>
<td>11</td>
<td>19</td>
<td>11</td>
</tr>
<tr>
<td>Housing</td>
<td>2</td>
<td>3</td>
<td>3</td>
<td>2</td>
</tr>
<tr>
<td>Plant Operations - Custodial</td>
<td>5</td>
<td>12</td>
<td>4</td>
<td>6</td>
</tr>
<tr>
<td>Plant Operations - All Other Sections</td>
<td>14</td>
<td>14</td>
<td>8</td>
<td>9</td>
</tr>
<tr>
<td>All Other Academic Support Depts.</td>
<td>13</td>
<td>16</td>
<td>20</td>
<td>8</td>
</tr>
</tbody>
</table>
In 2017, the Safety Office was informed of the fatality of a Science Technical Shop retiree, caused by exposure to asbestos. The individual worked at the University for 36 years, retiring in 1996. The WSIB claim was approved for mesothelioma. The claim is not factored into the NEER cost statement as it is related to occupational illness.

The following graphs depict the University's claims performance against our comparator Rate Group (817-Educational Facilities) in the WSIB system. 2017 marked the first year in which UWaterloo experienced a lower rate of injury than other employers in the rate group. While severity (days lost from work due to injury) is still slightly higher than the rate group, as depicted in Figure 2, UWaterloo continues to see a steady decline in lost time.

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

![Lost-Time Injury Frequency](image1)

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

![Injury Severity](image2)
Figure 3: WSIB Claims – Frequency of Non-Lost Time Claims

4.2 Incident Trends

The greatest number of incidents continue to be from slips, trips and falls primarily related to grounds conditions in adverse weather. The Safety Office established and promoted the Slips, Trips and Falls Program in 2017 to reduce the occurrence of these incidents. Compared to 2016, these incidents decreased 17%, and incidents related to walking decreased 20.8%. Figures 4 and 5 break down incidents by type and activity.

Figure 4: Types of Incidents
Figure 5: Incidents by Activity

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 2017, the Terms of Reference for the JHSC’s were reviewed and approved.

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 and the main campus is inspected in its entirety annually.

JHSC worker members conduct annual 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: Main Campus Joint Health & Safety Committee Inspections

<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>
<tr>
<td>2017</td>
<td>831</td>
<td>773 (93%)</td>
<td>58 (7%)</td>
</tr>
</tbody>
</table>

Figure 6: Hazard Type Identified During Inspections
4.4 Regulatory Contacts

Health and safety at the University is regulated by several government agencies including the Ontario Ministry of Labour (MoL), Ministry of Environment (MOE), Public Health Agency of Canada, Canadian Food Inspection Agency (CFIA), Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA), Transport Canada, and Canadian Nuclear Safety Commission (CNSC).

In 2017, the University was compliant with all directions and orders received from government agencies. The following table summarizes regulatory contacts and resulting actions.

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>March 16, 2017</td>
<td>CFIA</td>
<td>Application to import soil</td>
<td>Amendments to SOP required</td>
<td>Amended SOP provided and accepted</td>
</tr>
<tr>
<td>May 18, 2017</td>
<td>CNSC</td>
<td>Sealed source and radiation device inspection</td>
<td>No orders issued</td>
<td>No follow-up required</td>
</tr>
<tr>
<td>July 18, 2017</td>
<td>MoL</td>
<td>Critical injury investigation</td>
<td>No contraventions found</td>
<td>No follow-up required</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.

In 2017, the Safety Office began a thorough review of the various health and safety courses offered, started upgrading and transitioning courses to LEARN and initiated the development of a new safety training reporting tool for accessing the training records of employees and graduate students.
The following table summarizes training completed in 2017:

Table 6: Training Summary

<table>
<thead>
<tr>
<th></th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Number of Classroom Training Sessions</strong></td>
<td>81</td>
<td>75</td>
<td>78</td>
<td>123</td>
<td>111</td>
</tr>
<tr>
<td><strong>Number of Employees - All Training</strong></td>
<td>7296</td>
<td>13153</td>
<td>16209</td>
<td>16025</td>
<td>11712</td>
</tr>
<tr>
<td><strong>Number of Employees - Supervisor’s Safety Training</strong></td>
<td>109</td>
<td>1453</td>
<td>1181</td>
<td>737</td>
<td>649</td>
</tr>
<tr>
<td>SO1001 – Employee Orientation (online)</td>
<td>1764</td>
<td>3659</td>
<td>4268</td>
<td>3154</td>
<td>2819</td>
</tr>
<tr>
<td>SO1100 – Supervisor Safety Awareness (online)</td>
<td>--</td>
<td>1234</td>
<td>1091</td>
<td>644</td>
<td>603</td>
</tr>
<tr>
<td>SO1003 – Supervisor and H&amp;S Coordinator Orientation</td>
<td>109 (7 sessions)</td>
<td>219 (13 sessions)</td>
<td>90 (11 sessions)</td>
<td>93 (10 sessions)</td>
<td>46 (7 sessions)</td>
</tr>
<tr>
<td>SO1007 – Inspecting the Workplace</td>
<td>54 (4 sessions)</td>
<td>70 (8 sessions)</td>
<td>71 (8 sessions)</td>
<td>54 (8 sessions)</td>
<td>43 (8 sessions)</td>
</tr>
<tr>
<td>SO1012 – Incident Investigation</td>
<td>32 (4 sessions)</td>
<td>55 (8 sessions)</td>
<td>27 (4 sessions)</td>
<td>30 (5 sessions)</td>
<td>26 (5 sessions)</td>
</tr>
<tr>
<td>SO2016 – Safe Chemical Handling</td>
<td>--</td>
<td>--</td>
<td>45 (3 sessions)</td>
<td>84 (7 sessions)</td>
<td>85 (10 sessions)</td>
</tr>
</tbody>
</table>

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>Asbestos Management</th>
<th>Lockout</th>
</tr>
</thead>
<tbody>
<tr>
<td>Biosafety</td>
<td>Nanomaterials Safety</td>
</tr>
<tr>
<td>Compressed Gas and Cryogenic Liquids</td>
<td>Personal Protective Equipment</td>
</tr>
<tr>
<td>Chemical Safety</td>
<td>Radiation Safety</td>
</tr>
<tr>
<td>Confined Space</td>
<td>Respiratory Protection</td>
</tr>
<tr>
<td>Electrical Hazards</td>
<td>Return to Work</td>
</tr>
<tr>
<td>Ergonomics</td>
<td>Slips, Trips and Falls</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>
<tr>
<td>Laser Safety</td>
<td></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, to the Safety Office and provides the following functions:

- Oversees strategies to ensure ongoing and adequate surveillance, hazard identification, and risk evaluation of laboratory related activities
- Assesses requirements and recommends revisions for laboratory users training and laboratory safety procedures
- Reviews reports related to laboratory safety services, activities, incidents, and interventions in laboratory areas and recommends corrective actions when indicated
- Maintains subcommittees based on areas of expertise to receive, review and approve reports and applications required by legislation and regulatory agencies

In 2017, the committee carried out the following activities:

- Engaged researchers in risk assessment and preventive/corrective action identification
- Consulted on the review of the Radiation Safety Program and associated training
- Provided content recommendations for updating the Laser Safety Training course
- Monitored and provided feedback on the implementation of the chemical inventory system (eRPortal)
- Reviewed the risk mitigation measures related to 4th year Capstone projects
- Consulted on the renewed Biosafety Program, permit system and Plan for Administrative Oversight under new Public Health Agency of Canada licensing requirements

5.3 Emergency Plan

The University’s Emergency Plan underwent annual review in 2017. Activities conducted surrounding the plan include:

- The annual tabletop exercise was conducted with the Emergency Control Group (ECG).
- Research for the University’s Business Continuity Program was undertaken and various software solutions were reviewed and assessed.
- The Emergency Notification System and WatSAFE were both tested twice and WatSAFE was promoted each term.
- The Safety Office began working with Health Services to update the Pandemic Plan.
- The Canada Day Emergency Plan for the 150th anniversary celebration was revised.
5.4 Hazardous Waste Disposal and Environmental Safety Facility (ESF)

The Safety Office administers the University’s hazardous materials program and operates the ESF. Regular review of operations and associated costs continue to support the use of an internally managed program.

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>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>
<tr>
<td>2017/18</td>
<td>$11,800</td>
<td>$13,092</td>
<td>856</td>
<td>7275</td>
<td>7085</td>
</tr>
</tbody>
</table>

6. Strategic Goals and Objectives

6.1 2017 Goals and Objectives Status

<table>
<thead>
<tr>
<th>Objective</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Program development/annual review - 2017 objectives:</td>
<td></td>
</tr>
<tr>
<td>o Contractor Safety</td>
<td>In progress</td>
</tr>
<tr>
<td>o Electrical Safety</td>
<td>In progress</td>
</tr>
<tr>
<td>o Lock-out/Control of Hazardous Energy</td>
<td>In progress</td>
</tr>
<tr>
<td>o Fieldwork</td>
<td>In progress</td>
</tr>
<tr>
<td>o Radiation Safety</td>
<td>In progress</td>
</tr>
<tr>
<td>o Training</td>
<td>Deferred</td>
</tr>
<tr>
<td>o Fire Safety</td>
<td>Deferred</td>
</tr>
<tr>
<td>b) Commence a comprehensive review of training, including competencies,</td>
<td>In progress through 2019</td>
</tr>
<tr>
<td>gaps, needs, modes and resourcing</td>
<td></td>
</tr>
<tr>
<td>c) Continue transition of online courses to LEARN</td>
<td>In progress</td>
</tr>
<tr>
<td>Emergency Response Plan</td>
<td></td>
</tr>
<tr>
<td>e) Develop health &amp; safety coordinator orientation and communications</td>
<td>Complete</td>
</tr>
<tr>
<td>f) Continue to encourage the use of eRPortal across campus</td>
<td>470 labs are currently using eRPortal</td>
</tr>
</tbody>
</table>
6.2 2018 Goals and Objectives

a) Program development/review - 2018 objectives:
   a) Contractor Safety
   b) Electrical Safety
   c) Lock-out/Control of Hazardous Energy
   d) Fieldwork
   e) Radiation Safety
   f) Fire Safety

b) Continue comprehensive training review, complete migration of online courses to LEARN, and complete records reporting project for employee and student records.

c) Initiate development of a risk assessment procedure that employs health and safety management system principles for structure, integration and monitoring.

d) Through participation in Human Resources’ review of performance appraisal system, look to establish health and safety responsibilities for supervisors and employees.

e) Emergency Planning: Train resources to the Emergency Control Group on Incident Management System (IMS) principles and UWaterloo's Emergency Response Plan, and begin work on the University's Business Continuity Plan.

f) Establish WHMIS 2015 transition plan for labeling and Safety Data Sheet compliance, and provide resource support for laboratories.
Appendix A

Policy 34 – Health, Safety and Environment

Established: 7 January 1970
Revised: 10 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 above mentioned “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


6.1.1. 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;
o Periodic reports from Director of Safety on the HSE Program, which includes an assessment of faculty/departmental compliance with the HSEMS;

o 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, and 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

Page | 24
• 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.