

Health and Safety Programs

Health and Safety Policy - Development and Implementation

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Why should I have an occupational health and safety (OHS) policy statement?

Canadian health and safety legislation requires employers to have a health and safety program in their workplace. A written occupational health and safety policy helps define and promote an effective OHS program. Such a policy should communicate the employer's commitment to a healthy and safe workforce, be signed by senior management, be reviewed regularly, and updated as needed.

This document will assist in writing and applying an OHS policy for the workplace.

What is a policy?

CSA Standard Z45001-19 "Occupational health and safety management systems — Requirements with guidance for use" defines an OHS policy as "intentions and direction of an organization, as formally expressed by its top management."

The Gage dictionary defines “policy” as “a plan of action; a course or method of action that has been deliberately chosen and that guides or influences future decisions.”

In other words, an occupational health and safety policy guides actions. A policy indicates the degree of an employer's commitment to health and safety. The statement of the employers' obligation should be to meet, or ideally exceed, their legal duties.

What makes an effective policy statement?

There are many differences in form and content of corporate policies. Their style, however, is not as important as the clarity with which they identify functional responsibilities over authority.

To be effective, a policy should:

- acknowledge that the employer is ultimately responsible for worker health and safety,
- involve senior management and worker representatives in the preparation of the policy,
- hold all levels of management accountable for carrying out health and safety responsibilities,
- commit the organization to be, at a minimum, compliant with all applicable OHS legislation and other requirements,
- be seen as consistent with the workplace's objectives of operating in an efficient and predictable manner,
- commit to protecting the health and safety of workers by eliminating hazards and reducing risks as much as possible,
- be relevant and appropriate to the nature, scale and OHS hazards and risks associated with the organization's needs (not adopted from another workplace),
- provide a foundation for OHS goals and targets
- be of equal importance to the organization's other policy objectives,
- be well-documented, posted, communicated, and available to all relevant parties (including workers and interested external parties), and
- continually improve.

The policy should also cover:

- the responsibilities of appropriate personnel in maintaining a healthy and safe workplace to protect the well-being of all persons in the organization,
- the accountabilities of all levels of management for carrying out health and safety responsibilities,

- the importance of consultation and co-operation between management and employees for effective implementation of policy and any related programs,
 - commitment to monitor the policy's effectiveness by having a method for setting and reviewing OHS objectives and targets, and
 - commitment to provide adequate funds and details of how resources such as money or staffing will be available.
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Who should write the policy?

An employer may delegate the preparation of the policy. The policy should be written in consultation with the health and safety committee or representative, workers or their representatives, and the involvement of management. However, the written policy statement is a pledge to employees and therefore the employer is ultimately responsible for its content. It should be approved, dated, and signed by the senior executive of the organization (e.g., the president or chief executive officer).

How is the policy implemented?

Often OHS policies are implemented using one or more written procedures. Procedures are defined as a “specified way to carry out an activity or a process” by the CSA Standard Z45001-19 “Occupational health and safety management systems — Requirements with guidance for use”.

These are some of the major items to consider. The procedure should:

- state the arrangements that are in place to support and implement it. Items such as safety meetings, safe working procedures, occupational hygiene, and education and training should be outlined.
 - address the types of hazards associated with the organization. Depending on the types of tasks performed and the hazards present, it may be necessary for the employer to become fairly specific and detailed in outlining hazards.
 - discuss the active and ongoing participation of employees in helping to achieve the objectives.
 - be amended from time to time. They must keep pace with the changes occurring at the workplace, industry “good practice” guidelines, and applicable legislation, codes, or standards.
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How can the policy be effectively implemented?

- OHS responsibilities are clearly defined, assigned, communicated, and applied throughout the organizational structure,
- methods of accountability are established,
- procedures and program activities that support the OHS policy are implemented, and
- financial and other resources are provided, and
- responsibilities for carrying out the policy objectives are clearly communicated and understood within the workplace.

Tips:

While the assignment of responsibilities must be a complete list customized to the type of work and organizational structure, avoid being too specific that it makes people become too legalistic in interpreting the policy. For example, it may not be necessary to list the specific type of personal protective equipment that must be worn by a worker in a policy - simply state that all workers must use the personal protective equipment specified by the employer and as required by the nature of the work. As needed, this level of detail may be conveyed in a procedure. Procedures are generally more flexible, and this method allows changes to be made as circumstances warrant.

Responsibility should be extended throughout the organizational structure to ensure policy objectives will become integrated into all activities. For example, a policy could specify:

- individual responsibilities,
- legal responsibilities,
- accountability systems,
- promotion of health, safety, and well-being awareness,
- education and training needs,
- reporting and correcting health and safety deficiencies, and
- injury and illness control information.

How should the policy be communicated?

The policy must be communicated to relevant parties in languages they understand. Ways in which the OHS policy and responsibilities can be communicated include through:

- orientation (induction) and on-going training,
- health and safety committees,
- job descriptions,

- website, notice board postings, and reminders,
 - safety talks, meetings, and refresher training,
 - senior management attendance at safety meetings, and
 - demonstration of senior management commitment through effective review and response to committee recommendation inspection reports, incident investigations, and health and safety program evaluations.
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How can the effectiveness of the policy be monitored?

After the OHS policy has been prepared and implemented, it must be monitored to assess its effectiveness. The policy must be updated where improvements are needed. Some ways to monitor the effectiveness of the OHS policy include:

- Using key performance indicators to track progress in meeting OHS goals and targets (e.g., ensuring preventive maintenance is completed, safety meetings are held, and inspections are completed, situations reported are addressed appropriately and in a timely manner),
 - Training effectiveness reviews,
 - Regularly auditing and reviewing the OHS policy and program
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How and when should the policy be reviewed?

How often the policy must be reviewed must be established. The frequency may be required by applicable OHS legislation. It is recommended that the OHS policy be reviewed at least annually. A review may also be conducted before the scheduled revision date, especially when there is a change to the workplace that affect the policy, or the health and safety of workers.

The OHS policy must be recommunicated to all relevant parties whenever it is revised.

What is an example of a policy checklist to review an existing or new policy?

In review, here is a sample of a series of questions that could be used as a "Yes / No" checklist:

- Does the statement express a commitment to health, safety, and well-being? Are obligations towards employees made clear?
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- Does it say which senior officer is responsible for seeing that it is implemented and for keeping it under review, and how this will be done?
- Is it signed by a senior executive?
- Have the views of managers and supervisors, safety professionals, and health and safety committees or representatives, and workers been taken into account?
- Were the duties set out in the statement discussed with the people concerned? Do they understand how their performance is to be assessed and what resources they have to carry out their tasks safely?
- Does the statement make clear that cooperation on the part of all workers is vital to the success of the health and safety policy?
- Does it say how workers are to be involved in health and safety matters, for example, by being consulted, by taking part in inspections, or by participating on a health and safety committee?
- Does it show clearly how the duties for health and safety are allocated, and are the responsibilities at different levels described?
- Does it say who is responsible for the following matters?
 - Investigation reports and incident records.
 - Fire precautions and evacuation procedures.
 - First aid.
 - Safety inspections.
 - Education and training program.
 - Ensuring legal requirements are met.
- Is management solely responsible for providing a healthy and safe working environment?
- Is the employer's concern for health and safety as great as concern for financial and marketing matters?
- Does it include the names of individual managers who are responsible for making the safety policy work in specific areas or departments?
- Does it state the employer's duty to give education and training in health and safety to all workers?
- Does it outline the development and maintenance of health and safety roles and procedures?
- Does it include planned programs for health and safety at work?

- Does it ensure that health and safety matters will be taken into account when planning new methods processes or premises?
- Does it include arrangements for disclosing information, including multilingual information, on health and safety and well-being matters?
- Do all workers have copies of their employer's health and safety policy?
- Are health and safety committees or representatives consulted about periodic revisions and updating of the employer's health and safety policy?
- Has the policy been reviewed with the health and safety committee?
- Does it state who will review the policy and how often it will be reviewed?
- Are there effective arrangements for drawing the policy to the attention of all workers?
- Is the delegation of duties logical and successive throughout the organization?
- Is it clear that the ultimate responsibility for safety rests with senior management?
- Are the responsibilities of senior managers written into the policy or into job descriptions?
- Are there procedures and controls in place that ensure accountability?
- Is health and safety performance an essential ingredient of performance appraisals?
- Do line managers understand and accept the nature of their health and safety responsibilities?
- Are there arrangements for liaison with contractors?
- Are all individuals aware of their legal responsibilities?

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