CALGARY SAFETY CONSULTANTS

Health and Safety Policy Review Checklist

Check it against the law and the audit

How to use this checklist

Use this checklist for your annual policy review, before a COR or SECOR audit, when a new senior leader takes over, or when you start work in a new province or territory. Work through Sections 1 to 8 with your joint committee or health and safety representative, tick each item that is in place, then turn every gap into an action in Section 9 and sign off in Section 10.

- **Bring the evidence.** Have the signed policy, the program manual, the posting locations and your orientation material in front of you.
- **Ask workers.** Section 6 includes a short interview check. It tells you more than any document review.
- **Be honest.** An unticked box is an easy fix now and an audit finding later.
- **Scope.** This checklist covers the general health and safety policy. Other required policies, such as violence and harassment, need their own review.

Key terms

Term	What it means
Health and safety policy	The short, signed statement of the organization's health and safety commitment, responsibilities and commitment to follow the law.
Program	The system that delivers the policy. Some jurisdictions require a program and list a policy statement as one of its elements.
Current	Signed by the person who is the most senior leader today, and within your review cycle (annual is the standard to aim for).
Posted or available	Displayed or published where workers will see it. Auditors confirm it is in the places workers say it is.
Understood	Workers can say where the policy is and describe at least one commitment in their own words. They don't need to recite it.
Certifying partner	The organization that issues CORs and SECORs in your province and industry.

Section 1: Requirements by jurisdiction

Find every jurisdiction where you employ workers. Federally regulated employers follow the Canada Labour Code instead of provincial OHS law.

Jurisdiction	What the law requires	Who it applies to	Review, posting and signing
Federal (Canada Labour Code)	Statement of the employer's general health and safety policy made readily available (s. 125(1)(d)); policies and programs developed with the policy committee, workplace committee or representative (z.09)	Federally regulated employers	Readily available in printed and electronic form
British Columbia	Formal program including a statement of the employer's aims and the responsibilities of employer, supervisors and workers (OHS Regulation s. 3.3(a))	20+ workers with a moderate or high hazard workplace, or 50+ workers; smaller employers run a less formal program (s. 3.2)	No set interval; periodic management meetings review activities and incident trends
Alberta	Health and safety program (OHS Act s. 16); government says there are no mandatory elements	20+ regularly employed workers, or on a Director's direction	Not set in law; leadership and commitment is a standard element
Saskatchewan	Program with a statement of the employer's health and safety policy (Reg. 3-11(1)(a)) and a statement of responsibilities (3-11(1)(d))	Prescribed places of employment with 10+ workers	Program reviewed at intervals of no more than 3 years; guidance: most senior manager signs; policy made known to all employees

General information, not legal advice. Occupational health and safety requirements differ between provinces, territories and federally regulated workplaces, so adapt this form to your workplace and confirm the requirements that apply to you.

Jurisdiction	What the law requires	Who it applies to	Review, posting and signing
Manitoba	Written program with a statement of the employer's policy (Act s. 7.4(5)(a))	Workplaces with 20+ workers regularly employed	Program reviewed every 3 years or sooner; developed with committee or representative; available on request
Ontario	Written OHS policy, reviewed at least once a year, and a program to implement it; copy posted (OHSA 25(2)(j), (k))	More than five workers regularly employed	Annual review; posted (or readily accessible electronic format). Separate violence and harassment policies reviewed annually
Quebec	Prevention program (CNESST); a stand-alone policy statement is not in the minimum content	Establishments with 20+ workers (action plan at 19 or fewer)	Keep the program up to date as the workplace changes; confirm update rules with the CNESST
New Brunswick	Written safety policy setting out responsibilities, developed with employees (s. 8)	20+ employees (s. 8); 5 to 19 for each place of employment (s. 17(1))	Copy kept at each workplace; WorkSafeNB advises dated, reviewed and signed annually
Nova Scotia	Written OHS policy (s. 27); program at 20+ (s. 28)	5+ employees	Reviewed at least annually (Act); developed with committee or representative; guide: posted prominently, senior manager signs
Prince Edward Island	Written OHS program including a comprehensive OHS policy	20+ workers	Available and accessible to all employees
Newfoundland and Labrador	Written policy under 10 workers (Act s. 36.2); program at 10+ (s. 36.1)	All employers, by size	Policy posted, developed with representative or designate; program signed, dated and reviewed at least every 3 years
Yukon	Health and safety management system including a health and safety policy	20+ workers regularly employed (since July 1, 2022)	Developed with the JHSC; employer sets review expectations
NWT and Nunavut	General employer duties under the Safety Acts and OHS Regulations	Confirm with the WSCC	Confirm with the WSCC

Jurisdictions that apply to us	Workers in each (approx.)	Requirement that applies

Section 2: Legal requirements check

- [ ] We have a written policy wherever the law requires one at our size (for example Ontario, Nova Scotia, New Brunswick, Newfoundland and Labrador).
- [ ] Where the law requires a program, our program includes a policy statement (for example Saskatchewan, Manitoba, PEI, Yukon, B.C.'s statement of aims and responsibilities).
- [ ] The policy was developed or reviewed in consultation with the committee, representative or employees, as our jurisdiction requires.
- [ ] The policy is posted where the law requires posting (Ontario, Nova Scotia, and Newfoundland and Labrador for workplaces with fewer than 10 workers).
- [ ] Ontario and Nova Scotia: the policy has been reviewed within the last 12 months. Ontario: separate violence and harassment policies are in place and reviewed annually.
- [ ] Federal: the policy statement is readily available to employees in printed and electronic form.
- [ ] Federal: the harassment and violence prevention policy was developed jointly and reviewed within the last three years.
- [ ] The program review cycle meets our jurisdiction (for example, at least every three years in Saskatchewan, Manitoba and Newfoundland and Labrador).

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- [ ] Legal references in the policy name the jurisdictions where we actually work.

Section 3: Content check against COR expectations

Energy Safety Canada's 2023 COR audit protocol (Element A, Section 1) scores the written policy against these eight criteria. Tick each one the policy meets.

Criterion (ESC 2023 COR protocol, A.1.a)	Met	Where in the policy / notes
1. The company's goals, aims and commitment to health and safety	☐	
2. Employees' health and safety, including physical, psychological and social well-being	☐	
3. Management responsibilities (senior and middle management, as applicable)	☐	
4. Supervisor responsibilities	☐	
5. Worker responsibilities	☐	
6. A requirement to comply with government legislation	☐	
7. Signature of the current most senior manager for the business units audited	☐	
8. The date the policy was signed	☐	

Criteria met (out of 8)	Percentage	Notes

Also check (IHSA COR 2020 audit tool, Element 1.1, used in Ontario, and good practice everywhere):

- [ ] Commits senior management to set and review health and safety objectives.
- [ ] Commits to provide a safe and healthy work environment.
- [ ] Commits to comply with applicable OHS legal and other requirements.
- [ ] Commits to work in a spirit of consultation and co-operation with workers.
- [ ] Recognizes workers' right to work in a safe and healthy environment.
- [ ] Refers to a program that sets out responsibilities for workplace parties.
- [ ] Is signed by the president, CEO or local senior management, and is current.
- [ ] Is visibly posted, reviewed at least annually, and communicated and understood by employees.

Good practice (ISO 45001 clause 5.2 themes and plain-language tests):

- [ ] Commits to prevent injury and ill health, and is appropriate to our size, context and risks.
- [ ] Covers contractors and visitors, and names the work we actually do.
- [ ] Promises reporting without reprisal and states the right to refuse unsafe work.
- [ ] Fits on about one page, with no procedures, and a new worker can understand every sentence.

Section 4: Signing and currency

- [ ] Signed by the current owner, president or most senior leader of the business unit (not the safety coordinator).
- [ ] Dated, with the next review date shown.
- [ ] Re-signed since the last change of senior leader, company name or ownership.

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- [ ] Only one current version is in circulation; older versions are removed from boards, binders and the app.
- [ ] Version number and date match on the posted copies, the manual and the electronic copy.

Signed by	Date signed	Next review due	Version

Section 5: Posting and availability

Location	Posted	Current version	Readable	Notes
Main office	☐	☐	☐	
Shop or yard	☐	☐	☐	
Site trailer(s)	☐	☐	☐	
Company vehicles	☐	☐	☐	
Lunchroom or muster area	☐	☐	☐	
Intranet or safety app	☐	☐	☐	
Safety manual	☐	☐	☐	
Contractor package	☐	☐	☐	

Section 6: Communication and understanding

- [ ] The policy is covered in every new worker orientation, with a record of attendance.
- [ ] It was read or presented at a company or safety meeting after the last review.
- [ ] Supervisors have explained at least one commitment at a toolbox talk in the past year.
- [ ] Contractors receive it in contractor orientation or their site package.
- [ ] Senior management has communicated or demonstrated its commitment in the past year (ESC A.3.a).

Worker understanding check. Ask five to ten workers and supervisors from different sites and shifts: "Where would you find our health and safety policy?" and "What does it mean to you? Give me one example." Workers don't need to recite it.

Role and site	Knows where it is	Can explain it	Notes
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	

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Number interviewed	Know where it is (%)	Can explain it (%)	Interviewed by

Section 7: Links to roles, responsibilities and the program

- ☐ A separate statement of responsibilities expands on each group named in the policy.
- ☐ Safety responsibilities appear in job descriptions and supervisor expectations.
- ☐ Safety performance is part of performance reviews for managers and supervisors.
- ☐ Each commitment is backed by a program element: hazard assessment, inspections, training, investigations, worker participation, review.
- ☐ Health and safety objectives for this year are written down, with owners and target dates.
- ☐ The annual program review looks at whether the policy's commitments were kept.

Section 8: Common mistakes check

Tick each mistake you have checked for and avoided.

- ☐ Not copied word for word from a template; no other company's name or another province's law.
- ☐ No procedures or detailed rules in the policy.
- ☐ No guarantees or slogans we can't back up (for example, a promise of zero incidents).
- ☐ Psychological health is included, not just physical injury.
- ☐ Not posted in one place only; field crews and night shifts can see it.
- ☐ Workers were consulted before signing.

Section 9: Action plan

Gap found	Action	Owner	Due date	Done	Notes
				☐	
				☐	
				☐	
				☐	
				☐	
				☐	
				☐	
				☐	

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Section 10: Review summary and sign-off

Outcome of this review

- ☐ No changes needed: re-signed
- ☐ Minor changes made
- ☐ Rewritten
- ☐ Actions open (see Section 9)

Reviewed by (name and position)	Committee or representative	Review date

Summary of findings and changes

Senior leader	Signature	Date

Committee co-chair or representative	Signature	Next review date

Practice for audit interviews

Question an auditor may ask	What a good answer sounds like
Where would you find the company's health and safety policy?	"On the board in the shop and the trailer, and in the safety app." The auditor then checks those places.
What does the policy mean to you?	"If something's unsafe I can stop and report it, and I won't get in trouble for it." Own words, one real example.
Who signed it?	"Our president. She went through it at the spring safety meeting."
How do you put it into practice? (supervisor)	"I cover a commitment at toolbox talks and I make sure the hazard assessment is done before we start."
When was it last reviewed? (manager)	"Every January with the committee. Here's the review log and this year's objectives."

Want help? Calgary Safety Consultants writes and reviews health and safety policies as part of customized safety manuals, and helps employers prepare for COR and SECOR audits. CORs and SECORs are issued through the applicable certifying partner. Call 1-888-231-0358. Free guide: calgarysafetyconsultants.ca/safety-guides/safety-programs/health-and-safety-policy/.