



ONTARIO ASSOCIATION OF NON-PROFIT HOMES AND SERVICES FOR SENIORS

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Occupational Health and Safety System Review
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June 30, 2010

Dear Members of the Expert Advisory Panel

Re: Occupational Health and Safety System Review Consultation

We are pleased to present our recommendations related to the comprehensive review of Ontario's Occupational Health and Safety System. We appreciate the efforts of the Expert Advisory Panel and the Ministry of Labour in facilitating this review and being provided with an opportunity to voice comments on behalf of our members in regard to same.

The Ontario Association of Non-Profit Homes and Services for Seniors (OANHSS) is the provincial association that represents not-for-profit providers of long term care (LTC), services and housing for seniors. Our members, which include municipal and charitable long term care homes, non-profit nursing homes, seniors' housing projects and community service agencies, operate over 27,000 long term care beds and over 5,000 seniors' housing units.

In preparing for this submission, our Association provided a forum for our members to voice their comments on the Expert Panel's consultation paper. We heard from a number of our members as this is a critical topic for them, and comments included positives in addition to recommendations for improvement. For example, our members commented

on the efficacy of the Joint Health and Safety Committees as an effective mechanism for workplace injury prevention.

We also heard a number of recommendations for improvement, and have articulated these in the attached table.

We hope that you find our recommendations helpful, and if you require any additional information, please do not hesitate to contact me.

Sincerely,

Donna A. Rubin

Chief Executive Officer

Occupational Health and Safety Systems Review

OANHSS Recommendations to the Expert Advisory Panel

Issue Area	OANHSS Recommendation
Inter-Ministerial Cooperation	1. All government ministries must be required to give consideration to the impacts of funding, program, and policy decisions on workplace health and safety.
	2. Greater collaboration between government ministries is required to ensure that requirements and deadlines align so that conflicts and periods of excessive demands on the sector are avoided.
Partners in the Occupational Health and Safety System	3. The roles, visions and goals of the partners in occupational health and safety must be clarified and aligned.
	4. The partners must truly collaborate together and with employers to understand the barriers and the impacts of requirements on program delivery in work settings. Communication must occur laterally amongst/between the partners as well as between each partner and the employers.
Training	5. For any new requirements, the Ministry should provide training and support materials in advance of the implementation to ensure employers are able to meet the requirements in a timely way (e.g. the materials provided to support the coming into force of Bill 168).
	6. Provide online training modules that employers can adapt and utilize to facilitate staff training.
Resources	7. Funding models must address the requirements of occupational health and safety legislation to enable employers to meet requirements without negatively impacting the level of care delivered to residents/clients.
	8. Develop rebate programs as incentives for the development of proactive health and safety measures; innovation leading to safer workplaces; etc.
	9. Provide financial support for more members of JHSCs to become

Joint Health and Safety Committee (JHSC)	certified in order to increase the capacity and knowledge of these committees.
	<p>10. Empower JHSCs through provision of proposal opportunities to implement new initiatives (including, but not limited to purchasing new equipment designed to improve workplace safety; piloting new technology; implementation of best practices).</p> <p>11. Consider development of programs that include financial support from Ministry of Labour, WSIB, and the associations for employers to implement best practices (e.g. Ministry and WSIB match the funds that an employer is able to commit for an initiative).</p>
	12. Provide leadership training for Co-Chairs of the JHSCs to enhance effectiveness of these committees.
	13. In recognition of the barriers to effective IRSs, provide a resource (e.g. a contact and materials) for members to access for assistance with their IRSs and ensure that all partners collaborate with the sector to enhance effectiveness of the IRS.
	14. Ensure consistent interpretation of the <i>Occupational Health and Safety Act</i> . For example, provide more clarity for inspectors for interpretation of Section 25, and on types of Orders that can be issued.
Inspections	15. Provide financial support for more members of JHSCs to become certified in order to increase the capacity and knowledge of these committees.