

Table of Contents

17.1 Introduction 2
17.2 Procedures to Address Preventive and Corrective Actions 2
17.3 Preventive and Corrective Actions Response 3

17.1 Introduction

The Occupational Health and Safety Program is based on hazard recognition, evaluation and control. It puts into place systems that ensure that this happens on an ongoing basis. Together, these form a systematic approach which should provide the information necessary to take the actions which will protect employees and other members of the Saint Mary's Community from risks to their health and safety at University workplaces.

This chapter of the OHS Program deals with implementing a further element: one that examines whether the information acquired by the earlier parts of the program has been used to address any inadequacies and whether the actions taken have been effective in controlling the hazards.

17.2 Procedures to Address Preventive and Corrective Actions

Preventive actions are those taken to eliminate the causes of **potential** OHS Program non-conformances or **potential** hazards and risks to employees.

Corrective actions are those taken to eliminate the cause of **detected** OHS Program non-conformances and **recognized** hazards and risks to employees.

Sources for identifying necessary preventive or corrective actions include:

- legal requirements;
- hazard assessments;
- employee concerns;
- employee unsafe work refusals;
- safety Committee recommendations;
- procurement and contracting processes;
- change management review processes, such as regulations, industry standards, government agencies and research findings;
- workplace inspections;
- OHS statistics and management reports;
- incident investigation and analysis; and
- internal OHS Program audits or other system reviews.

There may also be weaknesses in some of the underlying systems of the OHS Program, including:

- preventive and protective measures;
- emergency prevention, preparedness and response systems;
- employee competence and training activities;
- communication and awareness activities;
- documentation activities;
- monitoring and measurement activities.

Previous chapters have addressed these systems and established responsibilities for each of these processes. In some cases, the procedures require action plans or follow-up, and the assessment of their effectiveness. In addition to undertaking each of these processes, it is also beneficial to review the

underlying factors or weaknesses in the OHS Program which allowed each non-conformance to exist, so that the causes may be addressed and future non-conformances eliminated.

Each time identification of a hazard that was not previously present, recognized, controlled, or where the controls in place were not sufficient to eliminate the risk, a part of the action plan and follow-up activity for that process must be an examination of what further can be done to put preventive and protective measures into place so that the risk is reduced.

17.3 Preventive and Corrective Actions Response

Initially, the review described above should be undertaken by the Manager or Chair who was involved in the originating process, such as a concern expressed by an employee, an unsafe work refusal, an inspection, or an incident investigation. Action plans, recommendations or comments should be added to the end of the originating documentation for the process. Action plans should identify the responsibilities for tracking preventive and corrective actions to ensure that they are completed and are effective.

The next stage in this review is for the JOHSC to review the documentation related to the originating process, including the recommendations or comments from any employees involved, and action plans, recommendations or comments made by the Manager or Chair. At this stage, underlying issues should also be considered, including weaknesses in any of the components of the OHS Program that allowed the deficiency to exist or to continue to exist. This review should confirm that responsibilities for tracking preventive and corrective actions have been established.

The plan for eliminating the hazard, including any control measures which are anticipated, should be reviewed to ensure that the control of the existing hazard does not create a new hazard. If necessary, as the changes are made, additional evaluations should be undertaken to determine the effectiveness of the changes and to ensure that no new hazard has been introduced.

The documentation developed during the above process shall provide one of the significant inputs to the management review and continual improvement of the Occupational Health and Safety Program described in Chapter 18 of this Manual.