Occupational health and safety and the internal responsibility system

OHS information for all Alberta work site parties

This bulletin gives basic information about the internal responsibility system that is the basis of Alberta's *Occupational Health and Safety (OHS) Act,* Regulation and Code.

What is an internal responsibility system?

An internal responsibility system is a way of sharing responsibility for health and safety between everyone in the workplace. Responsibility is shared according to each person's legal obligations, which are often based upon that person's authority and control at the worksite.

Because control and authority may not be shared equally at workplaces, responsibilities for health and safety may not be shared equally. In an internal responsibility system,

- employers are usually seen as having the most responsibilities, but
- all work site parties including workers have responsibilities.

Internal responsibility systems and legislation

In Canada, OHS legislation relies on the foundation of the internal responsibility system.

In some jurisdictions, such as Nova Scotia and Ontario, the internal responsibility system is written into or directly referenced in OHS legislation.

In other jurisdictions, including Alberta, the internal responsibility system is not included explicitly in legislation, but is a defining concept – especially, in regards to legislated roles and responsibilities for work site parties.

The *OHS Act* defines roles and responsibilities of work site parties including employers, supervisors, workers, suppliers, service providers, owners, contractors, prime contractors, self-employed persons and temporary staffing agencies.

Internal responsibility systems are also evident in Canadian legislation through requirements for worker participation in workplace health and safety, such as joint work site health and safety committees (HSCs) and health and safety (HS) representatives. These legislated functions serve as an internal observer of OHS issues and a forum for shared problem solving.

For more information on legislated health and safety roles and responsibilities in Alberta, see the resources list on page 3.

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The internal responsibility system in action

An internal responsibility system is working if everyone participates in work site health and safety, health and safety is integrated into all work site activities, and these efforts are effective in identifying ways to prevent injury and illness and promote worker health.

The internal responsibility system also needs to be responsive in order to be effective. When a problem is identified, there has to be a timely response within the organization. This promotes self-reliance - that is, the internal system can identify and address its own issues.

Here are some examples of the internal responsibility system in action.

- A worker wiping up someone else's spill.
- A supervisor checking, in routine daily activities, whether workers are wearing appropriate personal protective equipment – and making sure they do so, if they were not.
- An employer keeping records of worker certifications and training, and checking regularly to make sure they are current.
- A supplier arriving at a new site following any posted signage, parking safely in a designated area, and checking in with the site office or front desk – where they receive an orientation and run through of site safety rules.

The checklist attached at the end of this bulletin can help evaluate your internal responsibility system, and identify strengths and areas for improvement.

The checklist addresses:

- commitment and participation
- reporting and records management
- hazard assessment and controls
- training requirements
- monitoring and evaluation

Internal responsibility systems are also the basis of well-built health and safety programs, or health and safety management systems. In Alberta, employers with 20 or more workers must have a health and safety program that meets requirements in section 37 of the *OHS Act.* Alberta employers can also register for a voluntary Certificate of Recognition (COR) if they have a health and safety management system that meets standards developed by the Government of Alberta and our certifying partners.

For more on health and safety program requirements or the voluntary COR, see the resources list on page 3.

Internal responsibility systems

- contribute to work site safety culture
- establish responsibility sharing and accountabilities
- support increased self-reliance and improved compliance with applicable laws
- promote best practices
- help decrease workplace illnesses and injuries

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Contact Us

OHS Contact Centre

Anywhere in Alberta

- 1-866-415-8690

Edmonton & area

- 780-415-8690

Deaf or hearing impaired:

- 1-800-232-7215 (Alberta)
- 780-427-9999 (Edmonton)

PSI Online Reporting Service
alberta.ca/report-potentially-serious-incidents.aspx

Website
alberta.ca/occupational-health-safety.aspx

Get copies of the *OHS Act*, Regulation and Code

Alberta Queen's Printer
qp.gov.ab.ca

Occupational Health and Safety
alberta.ca/ohs-act-regulation-code.aspx

For more information

Certificate of Recognition 2019 (PIR002)
https://ohs-pubstore.labour.alberta.ca/pir002

Health and safety committees and representatives (LI060)
ohs-pubstore.labour.alberta.ca/li060

Health and safety programs (LI042)
https://ohs-pubstore.labour.alberta.ca/li042

OHS Employer's Guide (LI009)
https://ohs-pubstore.labour.alberta.ca/li009

OHS Worker's Guide (LI008)
https://ohs-pubstore.labour.alberta.ca/li008

Participation in health and safety for small business owners and worker (LI055)
https://ohs-pubstore.labour.alberta.ca/li055

Supervisor Roles and Responsibilities (BP020)
https://ohs-pubstore.labour.alberta.ca/bp020

Support the internal responsibility system at your work site

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Internal Responsibility System Checklist

The checklist below will help you assess how well your internal responsibility system is working.

To get the best picture,

- Ask a variety of people in a variety of roles at your work site – managers, supervisors, workers or other work site parties if present – to complete the checklist.
- Make sure the checklist can be completed and returned anonymously.

Yes	No	N/A	Commitment and Participation
☐	☐	☐	Do you understand the main concepts of the internal responsibility system?
☐	☐	☐	Are workers assigned and aware of job-specific standard operating procedures and other responsibilities for health and safety?
☐	☐	☐	Are managers and supervisors at the workplace committed to the internal responsibility system?
☐	☐	☐	Is the company leadership (CEO/Directors/President) committed to the internal responsibility system?
☐	☐	☐	Do workers participate in the development or within an established health and safety program(s) as required? (e.g. harassment and violence)
☐	☐	☐	Are you familiar with your organization's OHS policies, practices and procedures? Is it posted or readily available?
☐	☐	☐	Is there an established health and safety management system (OHS program) in place to support an OHS policy?
☐	☐	☐	Is the performance of management OHS responsibilities and those of other workers monitored?
☐	☐	☐	Are there policies in place to address work refusal and disciplinary action, reporting of unsafe equipment or practices, and a compliant resolution?
☐	☐	☐	Is the HSC or HS representative(s) functioning and available as required?
Yes	No	N/A	Reporting and Records Management
☐	☐	☐	Do workers report and document hazards and contraventions?
☐	☐	☐	Does management respond promptly to reports of OHS issues?
☐	☐	☐	Do you know of any occurrence of reprisal for reporting?
☐	☐	☐	Are records kept for those required by OHS legislation?

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Yes	No	N/A	**Hazard Assessment and Controls**
☐	☐	☐	Is there a hazard analysis program?
☐	☐	☐	Are the individual(s) conducting hazard assessments trained and competent?
☐	☐	☐	Is there a record of unresolved OHS issues or concerns? Is there a system to track identified hazards, unsafe conditions/issues and the corrective action taken?

Yes	No	N/A	**Instruction and Training**
☐	☐	☐	Is instruction and training sufficient for the level of responsibility of each particular work site party?
☐	☐	☐	Are managers/supervisors provided training to effectively perform their OHS duties?
☐	☐	☐	Is there access to health and safety information and resources?
☐	☐	☐	Do workplace parties demonstrate skills and knowledge necessary to perform the job healthy and safely?

Yes	No	N/A	**Monitor, Evaluate, and Improve**
☐	☐	☐	Is the OHS program reviewed regularly?
☐	☐	☐	Are workers competently trained and supervised?
☐	☐	☐	Are work site parties involved in investigation of workplace incidents and fatalities? Are corrective actions identified?
☐	☐	☐	Are senior managers accountable to monitoring OHS performance of management responsibilities?
☐	☐	☐	Do senior management regularly review and improve OHS policies and programs?
☐	☐	☐	Are leading and lagging indicators of OHS performance measures used?

Support the internal responsibility system at your work site

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