



Title: Performance Management, Continuous Improvement and Document Control	Section: 11	Issue Date: February 2022
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11.1 Policy Statement

Detailed, accurate, and careful documentation is an integral and essential aspect of Health & Safety Management. All CF management must ensure that all pertinent documentation is filed in the workplace and readily available for auditing purposes.

11.2 Record Keeping

All workplace H&S data must be tracked including documentation on accidents, training, safety performance, environmental controls, and minutes of the Joint Health & Safety Committee meeting.

For details on processing, maintaining and storage of these records, see the relevant sections in this H&S Management Manual.

11.3 WHMIS 2015/ Hazard Communications Documentation

WHMIS 2015/ Hazard Communications legislation requires that updated Material Safety Data Sheets (MSDS) or SDS be readily available in all our workplaces. Each workplace or department must be responsible to keep current MSDS sheets of all controlled products used in the workplace.

If MSDS or SDS sheets are not supplied with the products, they may be obtained by contacting the Product Supplier, or Management.

11.4 Management of Change and H&S Program Review

All employees, subcontractors, and suppliers in the workplace must protect the environment and their own health and safety, and that of co-workers, by working with the applicable legislative requirements and with the written safe work practices and procedures established by CF. This will be achieved by setting clear goals and objectives and managing change to legislative, CF or client requirements.

Clear goals and objectives are the framework in which CF will evaluate the success of the H&S program and provide a structure for continuous improvement. A combined commitment from employees at all levels will ensure the success of the H&S program by utilizing the Internal Responsibility System.



Standard

A comprehensive review of CF H&S program will occur on an annual basis. The review will include input from management, workers and applicable health and safety committees. If a change is required to CF H&S program, a systematic process will be carried out similar to the annual review to ensure it is adequately evaluated and implemented as necessary.

Purpose

To ensure a process that will:

- Utilize tools such as industry specific audits and benchmarking, as well as internal audits, ensuring CF continues to maintain best of class practices and legislative compliance
- Review current and potential legislative changes and their impacts
- Conduct reviews using industry established audits will be completed by a trained auditor and reviewed by senior management
- Utilize the Internal Responsibility System
- Focus on Best of Class practices and procedures
- Strive for continuous improvement
- Accomplish the companies number one core value of Safety First

Management of Change

CF recognizes that management of change is required to ensure a consistent and successful approach to managing changes to CF H&S program policies and procedures.

Change typically originates from, but is not limited to the following categories:

- Legislative change
- New or revised policy, procedure or practice
- Additional site-specific requirements

Legislative Change

In the event of a new legislative requirement CF Management will review the potential impact and requirement for change. If the change is required immediately the review and implementation procedure identified below will be followed.

If the legislative change does not require immediate action it will be reviewed in conjunction with the annual H&S program review.

New or Revised Policy or Procedure

A new or revised procedure may be developed based on changing work conditions, work types or lessons learned from past experience. If the change is required immediately the review and implementation procedure identified below will be followed.



If the new policy or procedure does not require immediate action it will be reviewed in conjunction with the annual H&S program review.

Site Specific Requirement or Change

A site-specific requirement may be required due to client or owner requirements based on work location or activity. The requirement will be evaluated against existing CF H&S program requirements. If the site-specific requirement exceeds those set forth by CF H&S program then the review and implementation procedure below will be followed.

If the site-specific requirement does not meet existing requirements then CF H&S program will be followed.

Review and Implementation Procedure

When a change has been identified the management of the change will be carried out as per this procedure:

1. Management will review the potential impact of this change
 - a. Locations
 - b. Documentation
 - c. Training
 - d. Work Process
2. Identify target audience and program implementation
3. Develop or modify existing policies, procedures and work instructions
4. Develop or modify existing training programs and communication tools
5. Deliver training or communication
6. Implement revised training and communication into CF H&S program
7. Verify and monitor training or communication has been completed (training records)

Annual H&S Program Review

CF will conduct an annual review of the H&S program to ensure it is in compliance with existing legislative requirements and implement best practices as deemed by CF.

Review Procedure

- Review previous years health and safety objectives
- Review existing and new legislative requirements
- Review industry trends regarding accidents and incidents
- Review leading and trailing indicators
- Audits and Inspections (Internal and External)
- Safety Opportunities / Safety Opportunity Data
- Training Requirements and Activity



- Trending
- Serious incidents and injuries
- Loss Time injuries
- Medical Aids
- First Aids
- Gather information/suggestions for improvement of safe work practices and procedures
- Review ways to improve safety culture
- Review each section of CF H&S program to ensure it remains relevant and in compliance based on the above

Setting Performance Objectives and Action Plans

The annual review process conducted by the H&S Department will identify key areas for improvement which are identified through the use of leading and trailing indicators.

Setting Performance Objectives

Performance objectives and action plans will meet the following criteria

- Will be aligned with Corporate target and objectives
- Will ensure legislative compliance
- Will strive to best of class practices and procedures
- Will includes recommendation from internal and external audits

Specific Performance Objectives

- Reduce Accident and incident frequency
- Increase focus towards leading indicators; such as Safety Opportunity reporting
- Improve supervisor training programs to reflect changes in practices and procedures
- Initiate intervention strategies
 - Poster Campaigns
 - Develop new training programs
 - Create sub committees to address specific initiatives agreed upon during review process

Approval of Performance Objectives and Goals

Performance objectives and other initiatives brought forth during the review process must have approval from H&S and Senior Management before being implemented.