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PURPOSE

Senior management believes that for health and safety performance to continuously improve, it must be organized, monitored, and regularly measured. We are committed to reviewing statistics, identifying trends and developing corrective actions to improve safety performance, ensure program effectiveness, legal compliance and areas for continuous improvement of the Health and Safety Management System (HSMS) at least annually. This procedure will help reduce accidents, injuries, and risk to workers by establishing a system to develop, record, and review records, statistics, and documents. Statistic will then be used to identify trends, monitor and evaluate the success of our OHSMS.

DEFINITIONS

Document:

A blank HSMS template, document or form used to record safety related information including emergency plans, hazard assessments, inspections, incident reports or other form tor report used to comply with the OHSMS

Lagging Indicator:

A reactive measure of negative safety performance measuring the effectiveness of a safety program after something has occurred (Incident, injury, equipment damage Near miss). Typical lagging indicators include the number of incidents, lost time accidents, medical aid, first aid, property damage and near misses.

Leading indicator:

A proactive measure of prevention efforts in safety systems and processes including inspections, meetings, training, hazard reports, surveys, equipment inspections, recommendations, communications and worker involvement.

Quantitative Information:

Relevant and verifiable data to produce a numerical value which is then used to identify trends, predict predict probability monitor the effectiveness of the OHSMS.

Qualitative Information:

Information, records or documents that do not have a numerical data, for example talking to employees about why a certain incident occurs to get a better understanding of why it happened or tracing an incident back to the root cause or measuring safety culture.

Record:

An OHSMS template, document or form such as emergency plans, hazard assessment, inspection, incident report or other form tor report completed electronically or manually to comply with the OHSMS.

Records also include written information such as orders or directives from the MLTSD, MECP, JHSC minutes, medical records or other regulatory authorities.

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These forms can be used for statistical review, identifying trends, and will be kept for a specific time or permanently as required.

Statistic:

A collection of information gathered over time, complied, and interpreted to show experience, identify trends, and used to compare historical data to expected outcomes.

SCOPE

This procedure applies to the organization, monitoring and measurement of health and safety documents and records including internal and external inputs, outputs and timing.

Documents, reports, records and information will be developed, retained and collected so that statistics can be gathered. Statistics will be used to identify trends and reviewed when evaluating OHSMS and Environmental Program performance.

In addition the procedure sets out responsibilities, time frames, and methods of gathering and evaluating information, identifying trends, creation of action plans and communicating results to workers and others as deemed required.

Qualitative and quantitative records are both vital to identify trends, program changes, progress. Implementation and overall effectiveness of the OHSMS.

Documents and records including incidents, near misses, hazard reports, first aid and medical aid accidents, inspections, incident and accident reporting forms, corrective action plans, JHSC meeting minutes, health records, recommendations and past performance comparisons will be gathered, statistics generated, and trends identified for review by senior management at least annually with the goal of identifying:

- 1) Areas of excellence
- 2) Non-conformance with program requirements
- 3) Areas for improvement, prevention of injuries and damage to , equipment and property

Both leading and lagging indicators will be tracked and reviewed to assess safety performance, identify trends and determine needs to improve health and safety performance as well as safety culture.

To ensure the best chance to identify trends:

- All OHSMS documents, forms and resources are available electronically or in hard copy.
 Construction site documents must be filed in binders on site and in folders on the server where possible.
- Documentation and records will be maintained on site until the project is complete.
- Office and facility documents must be filed electronically or manually and sent to head office if required.
- Office and facility documents must be med electronically of manually and sent to head office to be Uncerned, will be cent to head office to be
- Upon project completion, safety documents not already electronically stored, will be sent to head office to be physically stored or transferred to digital format and stored electronically.
- Hard copies of health and safety records will be maintained for two (2) years (unless otherwise required) to provide a historical account of the health and safety program.

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- Soft copies will be stored on J-AAR or HCSS servers indefinitely.
- Records of medical aid injuries shall be kept on file for seven (7) years.
- Records of occupational disease will be maintained indefinitely.

Findings and trends including historical comparison and recommendations for change will be communicated to prior to senior management for their review prior to the annual HSMS review and annual goal setting.

PROCEDURE

Identifying required data:

The HSE team or designate will:

- Identify records, forms, and information to be gathered and used to develop leading and lagging indicator statistics to measure the applicability, implementation, and effectiveness of our OHSMS
- Review safety documents regularly to gather and analyze data to identify trends
- Generate a report including trends and comparisons with past performance for review
- Communicate the trends to senior management
- Make recommendations for improvement of the OHSMS

Trends report will include at a minimum:

- Lost Time Accidents
- Medical Aid s
- First Aids
- Incident Reports
- Hazard Reports
- Equipment Damage
- Kilometers driven
- Vehicle Accidents
- Training
- MLTSD reports
- Inspections
- JHSC and Worker Representative activities and recommendations

Documents and information gathered may include but are not limited to:

- Senior management safety talks and communications (Leading indicator)
- Total number of management inspection reports (Leading indicator)
- Total number of supervisor inspection reports (Leading indicator)
- Total number of JHSC/worker rep inspection reports (Leading indicator)
- Equipment inspection reports (Leading indicator)
- Emergency response drill reports (Leading indicator)
- Total number of hazard assessments (Leading indicator)
- Total number of hazard reports (Leading indicator)

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- New safe work policies and procedures (Leading indicator)
- Progressive discipline records (for safety contraventions) (Lagging Indicator)
- Training sessions and courses (Leading indicator)
- Total number of health and safety meeting minutes/records (Leading indicator)
- Recommendations and issues resolved (Leading indicator)
- Subcontractor performance reports (Leading indicator)
- Total number of near miss reports (Lagging Indicator)
- Total number of accidents (Lagging Indicator)
- Total number of first aid injuries (Lagging Indicator)
- Total number of medical aid injuries (Lagging Indicator)
- Total number of critical injuries (Lagging Indicator)
- Total number of fatalities (Lagging Indicator)
- Total number of lost time injury days (Lagging Indicator)
- Total number of modified work days and return to work plans (Lagging Indicator)
- Total number of on road vehicle accidents/kilometers driven (Lagging Indicator)
- Total number of off-road equipment accidents (Lagging Indicator)
- Cost of equipment damage (Lagging Indicator)
- Summary of regulatory visits, orders and directives (Lagging Indicator)
- Work refusals reports and results (Lagging Indicator)
- Training sessions (Leading Indicator).

Data for statistical & trend analysis:

Managers and supervisors:

• Ensure that forms, check sheets and records required by the HSMS are completed at sites and facilities and filed electronically or manually.

Workers:

• Populate information on out forms, check sheets and records as instructed and submit them manually or electronically for filing.

Paper Documents, Forms and Records:

• Paper documents, forms and records must be filed at site daily and at head office weekly or as required by health and safety procedures if sooner.

Electronic Documents, Forms and Records:

• Must be synchronized by the end of each work day or as required by health and safety procedures if sooner.

The HSE team or designate will:

• Review and organize data from sites and facilities to create statistics

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- Identify trends using the statistical data
- Generate trends reports including monthly, quarterly, annually and year over year comparison reports using information, charts and graphs.
- Provide the reports to senior management for review monthly or as otherwise required
- Ensure year over year reports are generated for annual review
- Develop a presentation including charts and graphs to compare year over year results.

Review:

Senior management Will:

- Senior management will review statistics at least annually and consider the information in a timely fashion.
- Some trends may be reviewed more often (monthly, quarterly) when required to determine effectiveness of corrective actions or compliance with regulatory orders, directives or as determined necessary.
- Make changes to the HSMS as required to improve negative trends
- Communicate and celebrate positive trends
- Set goals and objectives to improved health and safety performance.

Safety team

The health and safety manager or designate will review health and safety statistics including both leading and lagging indicators and prepare a trend analysis and comparison report of the previous three (3) years.

JHSC

- The JHSC and representatives will review statistics and trends at minimum annually
- At their regular JHSC meetings when new trends are available
- Some trends may be reviewed more often as determined by the company
- Make recommendations for changes to the HSMS to improve safety performance

Training:

- In house training will be carried out by the Health and Safety Department including the contents and requirements of this procedure how and where to access documentation, forms, create, populate and store records in compliance with the OHSMS
- External training will be provided as required including inspections, accident investigations, and JHSC and representative duties.

Communications:

- A communications plan will be developed by the health and safety manager or designate. Worker participation will be strongly encouraged.
- The plan will account for all workers to participate in the communication meetings
- A schedule will be developed for mandatory meetings with participation of senior management, project management, supervision and workers.

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- Trend reports including annual statistics and year over year reports will be communicated to all staff at a minimum during annual safety meetings.
- Objectives and goals based on trends will be communicated by senior management
- Employee input, ideas and recommendations will be considered during meetings

Changes:

- Changes to information gathered and tracking of trends will be implemented as required or deemed necessary by the company
- Policy, procedure, practice changes will be developed by the health and safety department with input from workers and supervisors and approval of senior management

RESPONSIBILITIES

Senior Management:

- Provide commitment and resources for development implementation and review of the statistics and records policy and procedure.
- Set criteria for collection of documents, records and required information
- Develop an action plan in accordance with the management review procedure
- Consider trends to set reasonable, obtainable and measurable OHS goals or objectives
- Schedule statistical review in accordance with the management review procedure
- Communicate the statistical review results to employees and relevant parties
- Make changes required to improve the performance of the OHSMS
- Ensure relevant HSMS documents and records are completed and maintained
- File or send relevant H&S information to Head Office as required by the OHSMS
- Monitor the quality of orientation, audits, safety and JHSC meetings, hazard assessments, workplace and equipment inspections, hazard reports
- Monitor the quality of first aid, medical aid and lost time accident reports
- Compile project or facility related monthly or annual reports for H&S activities
- Complete subcontractor performance evaluations
- Ensure statistics, trends and corrective action plans are communicated to workers
- Encourage proactive hazard reporting is encouraged
- Participate in the statistical review communications

Supervisors:

- Record and track accidents, incidents, near misses first aid, medical aid and lost time occurrences, equipment damage, work refusal, MLTSD visits, directives, orders and recommendations
- Record and track training, orientation, audits, safety and JHSC meetings, hazard assessments, workplace and equipment inspections, hazard reports.
- File or send relevant HSMS records, documents and information to head office
- Participate in subcontractor performance evaluations
- Participate in the statistical review communications

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Workers:

- Report all accidents, incidents, first aid occurrences, lost time injuries and equipment damage to appropriate manager or supervisor
- Ensure completion and filing of HSMS documents, reports and records
- Participate in the statistical review communication
- Organize and track leading indicator documentation including orientation, audits, safety and JHSC meetings, hazard assessments, workplace and equipment inspections and hazard reports, and subcontractor performance evaluation.

Health and Safety Team:

- Organize and track lagging indicator statistics including accidents, incidents, near misses, first aid, medical aid and lost time accidents, equipment damage, work refusals, MLTSD directives, orders, recommendations and modified work days
- Review data, and develop trend analysis report for review by management
- Develop and communicate action plans based on statistical review.
- Make recommendations based on review of statistics

Health and Safety Committee/Rep:

- Complete required H&S documentation for inspections
- Complete required H&S documentation for JHSC meetings and recommendations
- Assist in the communication of review results as required
- Assist in quality review of documents

Subcontractors:

- Complete required H&S documentation for inspections
- Complete required H&S documentation for JHSC meetings
- Complete required H&S documentation for incident investigations
- Complete required H&S documentation for hazard assessments
- Communicate the results of review as required

Visitors:

• Complete required H&S documentation

REQUIREMENTS

Training

- In house training will be carried out by the Health and Safety Department including contents and requirements of this procedure and access to documentation, forms and storage of records in compliance with the HSMS
- External training will be provided as required including inspections, accident investigations, and JHSC and representative duties.

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Documentation

- Records of senior management meetings
- Records of employee communication meetings
- JHSC meeting minutes
- Annually review report

Legislative requirements

• Sections 8, 9, 25, 26 27, 28 of the occupational health and safety act

ENFORCEMENT

Following this procedure is a condition of employment for all employees. This will be enforced strictly by management and supervision. Failure to follow this procedure, as set out, may lead to progressive discipline up to and including dismissal or removal from site as deemed appropriate by J-AAR Excavating.

REVIEW

This procedure will be reviewed and revised as required. Revisions are required when there are changes in business conditions, scope of work, regulatory requirements or when deficiencies become known.

DOCUMENT CONTROL

All records and documents mentioned above will be stored indefinitely on the HCSS servers. They can be accessed by J-AAR management at anytime.