

Procedure for INTERNAL INSPECTION PROGRAM (96-03)

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PURPOSE

The purpose of this safety procedure/guideline is to establish a framework by identifying the duties, roles and responsibilities of workplace parties to ensure that the annual health and safety inspection program is effective and is in compliance with the applicable federal/provincial regulatory requirements.

The inspection process identifies hazards, evaluates the use of procedures to control hazards and educates personnel on expected standards at Western.

OBJECTIVES

- The objectives of the internal inspection program are:
1. To protect workers and other members of the University Community through the identification and correction of potential hazards in the workplace.
 2. Educate the University Community about the requirements of the Occupational Health and Safety Act and Regulations and other applicable standards and practices which will enhance the health and safety of the University Community
 3. Ensure the University complies with the Occupational Health and Safety Act of Ontario and related Regulations.

SCOPE

The primary aim of the Internal Inspection Program is the protection of the workers and other members of the University Community through the identification and correction of hazards. In addition, since the inspection is an opportunity to meet with members of the University Community it is an excellent time to make people aware of the requirements of the Occupational Health and Safety Act. The internal inspection program is an awareness and education program in addition to an enforcement program.

The Occupational Health and Safety Act requires that a worker representative from the Joint Health and Safety Committee inspects part of the workplace monthly with the entire workplace inspected annually. The Act requires that the employer provide the resources for this to happen. The University's Internal Inspection Program is the mechanism by which these inspections occur on the campus of the Western University.

The Occupational Health and Safety Act of Ontario and related Regulations serve as the minimum standards for the program. The Act states that the employer shall take every precaution reasonable for the protection of the worker. Additional measures taken may be guided by manufacturer's recommendations; standards developed by professional organizations; and practices followed by other businesses conducting similar work.

The goal is for the University to follow the most current standards applicable in the field of occupational health and safety. Availability of financial resources to mitigate a risk shall not be a determining factor in the University taking action.

RELATED DOCUMENTATION

Internal	External
<ul style="list-style-type: none"> • Health and Safety Policy (MAPP 3.1) • JOHSC Terms of Reference • Workplace Inspections 	<ul style="list-style-type: none"> • Legislative requirement • MOLISTD Standards/Guidelines • Manufactures recommendations • CSA standards • Hazard Alerts

DEFINITIONS

Control	Measures taken to mitigate the severity or likelihood of a hazard causing harm
Control of hazards	A systematic process of evaluating the potential risks (based on severity and likelihood) that may be involved in a projected activity or undertaking
Hazard	Source of harm or anything that can cause injury or illness in people, or damage to property
Hazard List/Risk registry or register	Inventory of identified hazards applicable to the workplace and work functions- typically a table that includes the identification of hazards and, as part of the risk management process, assessment of risk level, and identify controls to mitigate the risk
HSW	Human Resources, Health Safety & Well-Being
JOHSC	Joint Occupational Health and Safety Committee
OHSMS	Occupational health and safety management system
Procedure	Standard steps or series of actions to be taken to satisfy a requirement or complete a task
Process	The detailed and sequential series of steps needed in order to achieve a particular end or means
Risk	Combination of severity and likelihood of harm
Risk Management	A sequential process used to manage risk, includes identification of hazards, the assessment of the level of risk associated with the hazard and the required mechanism(s) to control the hazard by reducing the risk (reduce severity or reduce likelihood)
Risk rating	Degree of risk
Standard	A set of guiding principles to be followed during the development of process and procedures that form the OHSMS

ROLES & RESPONSIBILITIES

Senior Management responsibilities (Deans, Associate Vice-Presidents, Executive Directors):

- Monitor the internal inspection program and provide oversight
- Develop policies and procedures with respect to the overall health and safety of the University community, its faculty, staff, students and the general public.
- Assists or works in cooperation with HSW and/or the local health and safety committee and/or the Joint Occupational Health and Safety Committee as needed to correct, or address identified matters of health and safety within a department or area.
- Provide information to the JOHSC regarding the inspection program if requested.

Budget Unit Head responsibilities (Department Chairs, Area/Unit Managers, Unit Budget Heads):

- Ensure all orders from the inspection are complied with, initiated or appealed within the time stated in the order.
- Monitor that compliance with orders is maintained.
- Communication with direct reports regarding status of completed internal inspection.
- Maintain records for inspections for the unit related to internal inspection program.
- Designate a member of the unit to act in the role of unit representative.

Unit representative responsibilities:

- Participate in the inspection with representatives from HSW and JOHSC.
- Review findings from the inspection with HSW and JOHSC.
- Communicate the status of any corrective actions with HSW and budget unit head.

Joint Occupational Health and Safety Committee

- Reviews inspection data, details identifying areas of concern and makes recommendations to administration as necessary on matters of health and safety.
- Monitor the status of outstanding orders and report to Senior Management as needed.
- Advise on actions for past due compliance orders.

Health Safety & Well-Being responsibilities

- Scheduling the inspections of an area and co-ordinating with the JOHSC for worker representation.
- Providing advanced notice of the inspection and the procedure to the Unit head and unit representative prior the inspection.
- Follow-up of orders which are overdue with department representative, or other persons responsible for the area (unit head, facilities manager, dean's office).
- Review appealed inspection orders as submitted by unit budget heads.

- Maintain records from the internal inspection program.

Facilities Management

- Acts on submitted work requests for areas as required to complete identified corrective actions that require facility repair.
- Provides estimates for work to units for areas requiring alterations to the physical structures of buildings and services contained.

PROCEDURE

Inspections:

- All areas of Western University will be inspected on an annual basis.
- The JOHSC and HSW will conduct inspections on rotational basis during the year inspecting at least a portion of the workplace on a routine basis. Inspections will be completed in each month of the year until all areas of the workplace have been inspected.
- HSW will coordinate the inspection schedule with academic and administrative units, unit safety committees and the JOHSC to ensure parties with knowledge of the work area are present at the inspection.
- Any condition determined to be an immediate hazard that could lead to worker injury observed must have corrective action applied when discovered.
- Conditions that can not be immediately corrected during the inspection will be noted for follow up corrective action.
- Internal unit inspection records for the area may be reviewed at the annual inspection by HSW and the JOHSC

Determining and Reporting Corrective Actions for follow up action:

- At the completion of a unit inspection the representatives from the JOHSC, HSW and the unit will review observations and notes from the inspection to determine corrective actions requiring follow up action.
- An expected timeline for completion for corrective action will be assigned based on the risk of the identified hazard.
- HSW will provide a report of all corrective actions to the unit head, unit representative, and JOHSC member on the inspection and copy the responsible Dean or Associate Vice President for the area.
- If possible, identified hazards will have corrective actions applied during the inspection. Such items will be noted in the report as “corrected during inspection”.

Status of Corrective Actions:

- Budget Unit Heads have primary responsibility for ensuring that all orders are complied with, initiated, or appealed

- Appeal of a corrective action from the inspection report is completed by submission of an alternative plan to resolve the identified issue at the inspection is submitted by the Budget Unit Head to HSW.
- HSW will review the appealed submission.
- The unit representative or unit management will assign corrective actions to responsible members of the unit for completion.
- The unit will communicate the status of orders as completed to HSW.
- HSW will compile past due compliance orders 21 days outstanding beyond the due date where there has been an inadequate response from the department or unit in question for review by the JOHSC.
- The JOHSC will discuss these overdue orders and escalate corrective action with the unit and senior management
 - Escalations can include suspension of operations; tagging and locking equipment out of service; closing of a laboratory; or hiring qualified persons outside the unit correct the situation. Any external to the unit costs related escalated corrective actions are billed the budget unit.

Record Keeping of Inspections:

- Inspections are documented using the WorkSafe@Western administrative system.
- Western personnel assigned to an inspection action item are able document corrective actions taken or upload photos to identify completion.

COMMUNICATION

The results and corrective action taken for the internal inspection program will be communicated to the employees in a number of ways:

- Minutes of the health and safety committee meetings,
- Postings on notice boards,
- Electronic communications,
- Department Meetings,
- Follow up on corrective actions completed by the budget unit head or department representative to affected individuals.

Past Due Orders

Order overdue by 21 days, with no response, will be followed up with communication to the budget unit head with a copy sent to the responsible Dean or Associate Vice President, by HSW. A copy of all this correspondence will also be sent to the worker member of the JOHSC who participated in the inspection.

TRAINING
<ul style="list-style-type: none"> As part of their accountabilities, members of the JOHSC are trained on how to complete inspections. Worksafe@Western has user training guides available to have assignees manage corrective action completion.
EVALUATION
<ul style="list-style-type: none"> This procedure will be reviewed on at least an annual basis by Health Safety and Well-Being and the Joint Occupational Health and Safety Committee
IMPROVEMENT & ACKNOWLEDGEMENT
<ul style="list-style-type: none"> All members of the Western Community are encouraged to participate in maintaining a safe workplace and report issues to Health Safety and Well-Being or Facilities Management as required.

FORMS / RECORDS
<ul style="list-style-type: none"> JOHSC inspection checklist Supervisors' inspections Worksafe@Western
REFERENCE MATERIALS
<ul style="list-style-type: none"> JOHSC terms of Reference

CHANGES TRACKING	
DETAILS OF CHANGES	DATE CHANGED
Revised Format Document	June 18 th 2025
Revised Procedures for Inspections	June 18 th 2025