Calgary

City Auditor's Office

Safety Management Audit
April 10, 2024

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Audit Objective	The objective of this audit was to assess the effectiveness of the Occupational Health and Safety Business Unit's (OHS BU) monitoring and mitigation of safety incidents.

Why it Matters

The City of Calgary has identified health, physical safety, and psychological safety as key priorities. Effective monitoring and mitigation of safety incidents is critical to support The City in meeting its health and safety targets.

The City is aiming to achieve Lost Time Claim Frequency of 4.5 by 2026 (2023 mid-year results are 5.7) [1]. Keeping employees safe is a core value at The City, as it supports resilient service delivery and underpins The City's ability to attract and retain employees.

What We Concluded

Governance structures, processes, and supporting tools in place are partially effective in supporting the monitoring and mitigation of safety incidents.

Key structures supporting effective monitoring and mitigation of safety incidents, such as an Occupational Health and Safety Management System (OHSMS), Training Guidelines, and an Incident Management Standard have been established. Processes have been established to support the reporting of serious incidents. The OHS BU regularly updates employees on safety through various channels, promoting awareness of occupational health and safety news, tips, and regulatory changes. However, updates are required to both the content of key documents, and supporting processes and tools, to better support monitoring and mitigation of safety incidents by business units more effectively. We identified five key actions that are required for the OHS BU.

- Enhancing the OHSMS including updating Training Guidelines and creating an internal audit program.
- Updating the Incident Management Standard and developing supporting guidance for Safety Advisors.
- Refining the reporting tool (Safety Data Management System (SDMS)) to flag serious incidents.
- Developing a standardized leader safety reporting process; and
- Enhancing the corporate-level Safety Dashboard with both leading and lagging safety performance indicators.

During the last four years, the OHS BU have focused resource efforts on supporting The City during the COVID-19 Pandemic, organizational realignment, and the 2022 Certificate of Recognition (COR) audit. There is now an opportunity to review and refresh key governance structures, processes and tools supporting effective monitoring and mitigation of safety incidents to facilitate The City's achievement of health and safety goals more effectively. The OHS BU agrees with the recommendations and has developed action plans to implement process changes by December 2025.

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[1] 2023-2026 Service Plan and Budget – 2023 Mid-Year Update

Background

The OHS BU develops and implements policies, standards, and programs to advance a culture of safety in The City. The OHS BU delivers programs and initiatives such as safety advisory support, health and safety systems, and occupational health management to enhance the safety and well-being of City employees. In addition, the OHS BU supports a safety culture of responsibility, productivity, and accountability at the individual, leadership, and corporate levels to ensure everyone completes their work without incident and goes home safe and healthy every day. Key activities that are delivered by the OHS BU include:

- Design, implement, and evaluate corporate wide systems, programs, and initiatives for City services to enhance employee safety and well-being.
- Safety programs such as health and safety advisory support and other occupational health programs.[2]

The City of Calgary has implemented the OHSMS to create a systematic and coordinated approach to occupational health and safety for The City's Departments and Business Units. This system and its supporting processes enable the organization to mitigate its occupational health and safety risks and improve performance.

Safety management activities are categorized by the OHS BU into three sets of processes. Responsibility for leading these activities lies with either the OHS BU, or Business Units (BU), or is a shared responsibility as depicted in Figure 1.
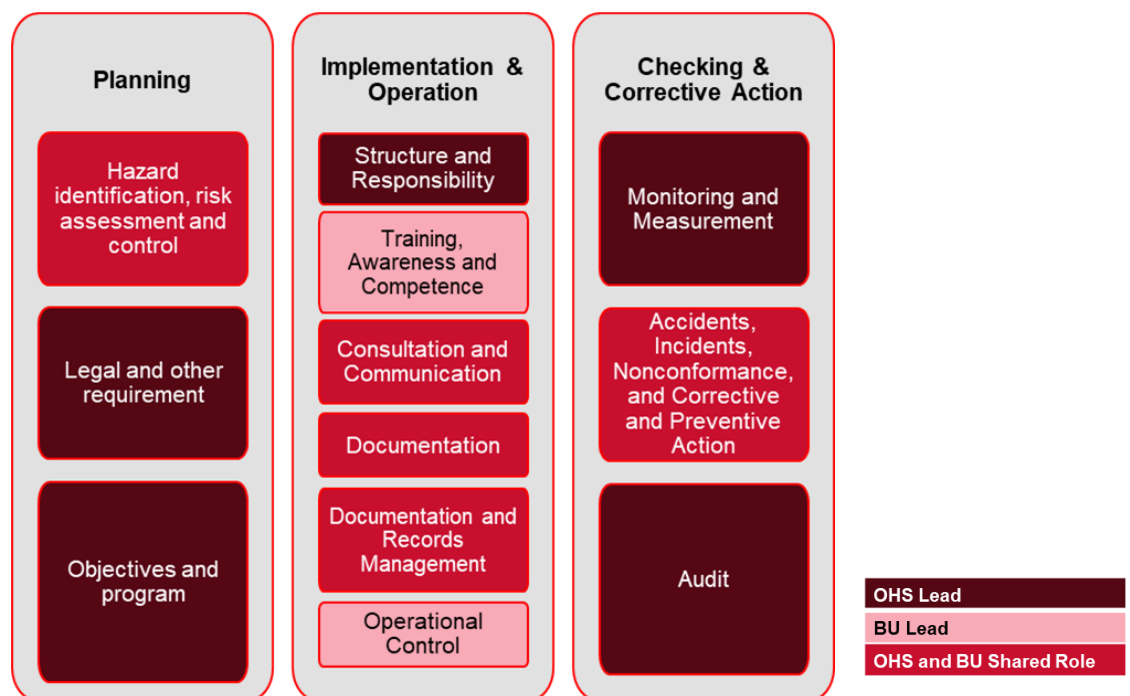

Figure 1. Source: OHSMS Manual

OHS BU has stated that an Alberta Government OHS Proactive Inspection audit program is currently underway for 19 Municipalities across Alberta – including The City of Calgary. The Alberta Government OHS Proactive Inspection program has specific areas of focus, based on the most common hazards and incidents in those industry sectors. The inspection assesses compliance with the legislation through review of records and documents, observations, and conversations with work site parties.

Scope & Approach

The audit scope covered safety activities conducted by the OHS BU between September 2022 and July 2023. Safety activities led and managed outside of the OHS BU were out of the scope of this audit, i.e., the audit did not include an assessment of the safety roles and responsibilities owned and performed by other Business Units.

Not included in the scope of the audit are significant external review processes to which The City is committed. These processes include the Certificate of Recognition (COR) audit conducted by the Government of Alberta Partners in Injury Reduction safety initiative every three years. In 2022, The City achieved a 92% score. A Provincial Inspection audit is currently underway, with an anticipated conclusion by the end of 2024.

The audit assessed the effectiveness of monitoring and mitigation of safety incidents. The audit reviewed the controls and processes that intend to mitigate a) lack of safety awareness (through insufficient training for example); b) inadequate investigation of safety incidents; c) ineffective safety reporting; and d) non-compliance with safety requirements.

Results

The results of the audit are summarized by the key areas supporting the monitoring and mitigation of safety incidents where the OHS BU has oversight accountability:
- Governance and Compliance
- Incident Management
- Training
- Safety Reporting

Governance and Compliance

We assessed the design and operating effectiveness of the governance and compliance structures and supporting processes established by OHS BU.

A key component of governance in place is the OHSMS, which provides the framework for implementing the City's OHS Policy, supporting the management of safety risk and safety performance improvement. The OHSMS, which is complemented by safety programs such as Hazard Identification and Risk Control, training, emergency preparedness & response, and legal/regulatory management, is expected to drive a systematic and coordinated approach to occupational health and safety within The City, and support compliance with safety requirements.

However, we concluded that the OHSMS is not currently fully effective in mitigating safety risks as it does not contain key relevant up-to-date content to support a systematic and coordinated approach to occupational health and safety (Recommendation 1).

We reviewed the process to assess compliance with internal health and safety management systems and regulatory requirements and we noted that while OHS has a mandate to establish and maintain an internal audit program that will ensure ongoing maintenance and adherence to related policies and procedures, there is currently no internal audit program in place to internally assess compliance with the OHSMS and regulatory requirements (Recommendation 1).

Incident Management

We assessed the effectiveness of monitoring and mitigation of safety incidents by reviewing the controls and processes that mitigate the risk of inadequate investigation of safety incidents. We assessed three sub-processes: incident reporting, serious incident investigation, and overdue action follow-up.

Incident Reporting

The Incident Management Standard outlines the process for reporting, investigating, documenting, and tracking actual or potential OHS incidents, near misses, and hazardous conditions. It sets consistent minimum requirements which support risk mitigation, mandating investigations using the SDMS for record-keeping.

We conducted data analytics on the 5901 safety incidents reported during the audit period. From our review of the incident reporting process, we concluded that while BUs and service areas have instructions for reporting and conducting an investigating for safety incidents, Safety Advisors require guidance on how to consistently support BUs in managing incidents. We noted instances where reported incidents did not include required signoffs by the Safety Advisors, resulting in incomplete details such as root cause and corrective actions. (Recommendation 2).

Serious Incident Investigation

When a serious incident occurs, the supervisor notifies their safety advisor. Depending on the type of incident, additional actions may be necessary. Serious incidents are typically flagged in the system as "lost time, medical aid, first aid, fatality, or public incident."

To ensure serious incidents are adequately investigated and addressed, notifications are made to the Workers Compensation Board (WCB), Alberta OHS, and the Law Business Unit. We selected a sample of 25 serious incidents and reviewed the notification process:

WCB notification
Generally, WCB is contacted if an employee receives medical attention or misses work due to a work-related injury. Incidents reported as medical aid and lost time in SDMS are currently reported to WCB. However, we noted that improvements are needed to ensure timely communication with all parties involved (Recommendation 3).

<u>Alberta OHS notification.</u>
The Provincial OHS Authority requires notification for certain incidents.
While there is a process in place to ensure that Safety Advisors report these types of incidents, our review noted an improvement opportunity to ensure more timely notification to the provincial authority (Recommendation 3).

<u>Law Business Unit notification</u>
The OHS Lead is to notify the Law Business Unit immediately after any serious incident. We noted that all serious incidents in our sample testing were communicated to the Law Business Unit as required.

Follow-up on overdue actions

Per the Incident Management Standard, all corrective actions for safety incidents must be implemented and checked for effectiveness by the business unit that had the incident. We completed data analysis on the 9580 corrective actions in the audit period. Based on our review of the follow-up process to ensure corrective actions are addressed adequately, we noted that Safety Advisors recommend appropriate corrective and preventive actions to prevent future incidents, while BUs ensure timely completion of corrective actions. However, we identified that the level of support provided by the OHS BU should be more consistent and enhanced to ensure overdue safety action items are adequately resolved by the BU (Recommendation 2).

Training

Training is a key process to mitigate the risk of lack of employee awareness of safety requirements. The OHS BU is responsible for developing and maintaining a guideline for safety training. The OHS Training Guideline facilitates safety by supporting employees being competent to perform their assigned tasks safely.

We assessed the design of processes and controls related to safety training and concluded that communication of training was effective in mitigating risk of employees being unaware of safety requirements. We noted that adequate safety-related communications are provided by the OHS BU to employees through various platforms including the Workplace Occupational Health & Safety page, OHS Training Portal on My City, and Safety Topics Library.

However, our review found that while the OHS Training Guideline mandates updates every three years, the last revision was done in 2012 and the content is out of date, limiting the effectiveness of the Guideline (Recommendation 1).

Safety Reporting

The OHS BU reports on safety performance through various channels, including One Calgary, Joint Workplace Health, and Safety Committee (JWHSC) meetings and safety work plans, as well as the Safety Dashboard.

We assessed the effectiveness of the process of reporting safety performance to relevant stakeholders by reviewing the safety reporting at two departments and two JWHSC meetings. Our review noted adequate safety reporting at all JWHSC meetings as the reports included regulatory updates, safety performance tracking and updates on workplace inspections.

In addition, we assessed the adequacy of reporting through the Corporate Safety Dashboard and One Calgary performance report. We noted that safety performance metrics are communicated through both channels and these performance metrics enable monitoring of safety trends.

However, we concluded that improvement opportunities are required to ensure consistent reporting to departmental leaders, enhance the use of the Corporate Safety Dashboard, and align the initiatives tracked through the One Calgary report (Recommendations 4 and 5).

Observations & Recommendations

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<tr>
<td colspan="2">#1: Occupational Health & Safety Management System</td>
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<td>OBSERVATION</td>
<td>RECOMMENDATION</td>
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The OHSMS does not contain certain key relevant up-to-date content to support a systematic and coordinated approach to occupational health and safety.

The OHSMS has not been revised annually as stipulated by the OHSMS Manual and referenced in the OHS Policy. The last review of the OHSMS Manual was performed in 2021.

A key element of the OHSMS is the OHS Training Guideline. The Training Guideline states it is to be revised every three years but was last reviewed in 2012. The Guideline content is out of date and limits the effectiveness of the Guideline as it:

- References roles/departments no longer in existence (e.g., Environmental & Safety Management Business Unit)
- Does not include key safety training processes such as the incident reporting process and how to use the reporting tool (SDMS).
- Does not fully capture regulatory corporate level training requirements (e.g., training on roles and responsibilities for the Joint Health and Safety Committees required by the Alberta Occupational Health and Safety Act); and
- Does not contain accurate links to registration for some key training courses: e.g., the registration link for "Learning for Municipal Excellence - Managing Workplace Safety" is broken, and the registration link for "Leadership for Safety Excellence," an external course, is missing completely.

The OHSMS is also missing a key element: an internal safety auditing process. OHS has a mandate to establish and maintain an audit program that will ensure ongoing maintenance and adherence to related policies and procedures. However, OHS has not developed a process to internally assess compliance with the OHSMS and regulatory requirements.

Without this key relevant content, there is a risk the OHSMS may not meet the regulatory requirements to guide the organization to achieve the desired results for occupational health and safety.

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1a) The Director, Occupational Health and Safety to review and update the Occupational Health and Safety Management System (OHSMS) and establish a periodic cycle of subsequent OHSMS reviews.

MANAGEMENT RESPONSE

Agreed

- Review current OHSMS and make updates by the end of 2025.
- Record review and revisions requirements in updated OHSMS; the Occupational Health & Safety business unit has defined a review period for the OHSMS as every three years, unless otherwise required (e.g., Alberta OHS Legislative changes).

LEAD
Director, Occupational Health and Safety

Support:
Manager, Health and Safety Programs,
Manager, Strategic Services,
Leader, Safety Programs and Standards.
Leader, Business Excellence,
Leader, Safety Systems, Finance and Human Resources.

COMMITMENT DATE
December 31, 2025

1b) Manager, Health and Safety Programs, to update the OHS Training Guideline.

MANAGEMENT RESPONSE

Agreed

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	- OHS will develop a draft OHS Training Standard and complete updates to the OHS Training Guideline. - OHS will consult leaders and Learning & Development teams from across the Organization on the draft OHS Training Standard and Guideline. - Implementation of this new Standard and Guideline will occur in 2025. **LEAD:** Manager, Health and Safety Programs **Support:** Leader, Auditing, and Performance Leader, Safety Programs and Standards and Leader, Business Excellence. **COMMITMENT DATE** - December 31, 2024 - December 31, 2025 - December 31, 2025 1c) Manager, Health and Safety Programs, to develop a comprehensive internal safety auditing process covering all OHSMS safety activities. **MANAGEMENT RESPONSE** Agreed - OHS will develop an internal safety auditing program and associated tools. - OHS will consult with internal and external interested parties to develop the internal safety auditing program and associated tools based on best practices and industry standards. **LEAD** Manager, Health and Safety Programs **Support:** Leader, Auditing, and Performance Leader, Safety Programs and Standards **COMMITMENT DATE** June 30, 2025

#2: Incident Reporting and Management Process	
OBSERVATION	**RECOMMENDATION**
The Incident Management Standard content does not support consistent actions by Safety Advisors in the management and follow-up of safety incidents. The Incident Management Standard was last reviewed in 2019 and includes references to non-existent roles (Environmental and Safety Management) and missing supporting documents (Occupational Health and Safety Core Manual).	2a) The Manager, Health and Safety Programs to review and update the Incident Management Standard.
Incident Management	**MANAGEMENT RESPONSE** Agreed
Our review of safety incidents in the audit period identified that the support provided by Safety Advisors in managing incidents is inconsistent:	• The Manager, Health and Safety Programs will update the Incident Management Standard to address specific functions of incident investigation team members and approvers.
• 13% of incidents reported were not reviewed and approved by a Safety Advisor. • 20% of incidents reported in SDMS lacked documented root causes and corrective actions established by the investigating supervisor, a deficiency that should have been identified through the Safety Advisor review and approval process.	• Consult with various business units and external partners in the development of the Incident Management Standard. • Support all business units in the implementation of the updated standard across the Corporation.
In addition, safety advisors do not consistently review serious incidents reported in SDMS for completeness of data entry, adequacy of corrective actions, and perform required signoffs. Our testing noted that, for the audit period, 8% of reported serious incidents did not have complete investigations and one incident was incorrectly flagged as OHS reportable.	**LEAD** Manager, Health and Safety Programs and Manager, Strategic Services
Follow-up on overdue actions	**Support:** Leader, Auditing and Performance Leader, Safety Programs and Standards, Leader, Business Excellence and Leadership from across the Organization
The Incident Management Standard mandates the implementation and verification of all corrective actions. However, our review identified variations in understanding among safety advisors regarding their roles and responsibilities:	**COMMITMENT DATE** December 31, 2025
• Safety Advisors' understanding of their role in following up on overdue corrective actions varies as some Safety Advisors provide a deep level of support to BUs while others provide minimal support. • From our audit sample, we noted 8% of corrective actions that were recorded with errors in the information provided on SDMS and inaccurate completion dates. These errors should have been identified through the safety advisor review and approval process.	2b) The Managers, Safety Operations to develop and deliver supporting guidance for Safety Advisors on their role in incident management and reporting.
Inconsistencies in reporting and managing incidents increase the risk of incidents reoccurring within Business Units, where preventative and corrective actions are not taken on time and increase the risk of non-compliance with occupational health and safety legislative requirements. A clear, comprehensive Incident Management Standard, and clear definition of responsibilities for supervisor	**MANAGEMENT RESPONSE** Agreed • The Managers, Safety Operations will develop incident management roles and responsibilities for safety advisors that are aligned with

investigations, safety advisor review and manager approvals to support consistent actions and oversight.	updated Incident Management Standard and undertake researching & benchmarking on the appropriate capacity and level of incident reporting and management process oversight and quality control. • The Managers, Safety Operations will educate and evaluate Safety Advisors in these roles and responsibilities. • OHS will provide guidance to Leaders from across the Organization on their roles and responsibilities as it relates to the revised Incident Management Standard **LEAD** Managers, Safety Operations **Support:** Leaders, Safety Operations, Leader Leader, Safety Programs & Standards, Leader, Business Excellence and Leaders from across the Organization. **COMMITMENT DATE** December 31, 2025

#3: Incident Reporting Tool	
OBSERVATION	**RECOMMENDATION**
The City's incident reporting tool, SDMS, is not fully configured to support timely and accurate reporting of serious incidents with high impact. While there is a definition for serious safety incidents included in safety guidelines and toolkits, there is no option to flag an incident as serious in SDMS, which limits both consistent follow-up actions and reporting on trends for this type of incident. The option to flag incidents that must be reported to the Workers Compensation Board (WCB) relies on the worker/supervisor to provide the correct incident classification when entering the incident in SDMS. OHS indicated that there is a compensating activity in place whereby the OHS WCB Coordinator periodically reviews incidents reported as medical aid or lost time to determine if these incidents	3. The Manager, Safety Strategic Services to initiate an update to the configuration of the reporting tool (SDMS) to flag incidents as serious in nature and those requiring reporting to the Workers Compensation Board. **MANAGEMENT RESPONSE** Agreed **ACTION PLAN**

should be notified to WCB. However, there is a possibility that reportable incidents may be missed or identified late through this manual process.

Our analysis of incidents in the audit period identified two instances where reporting to external parties was not completed on time.

- One incident that should have been reported to the provincial regulator was only reported after three months when the province requires the employer to report a serious incident "as soon as possible."
- One incident that should have been reported to the WCB after 72 hours was communicated after eight days even though the employee was absent at work the day after the incident.

OHS stated that this may be a result of incorrect reporting to SDMS by the affected business units.

Configuring the incident reporting tool to accurately capture serious and reportable safety incidents mitigates the risk of untimely reporting, supports appropriate action, and allows for analysis of trend information about these types of incidents.

The Manager, Safety Strategic Services to:

- Develop potential updates to the SDMS reporting tool to ensure serious incidents are flagged and reported where required.
- Update Leadership Toolkit to reflect these changes to the reporting requirements.
- Engage leaders from across the Organization to implement the changes to the SDMS reporting tool and the Leadership Toolkit.

LEAD
Manager, Safety Strategic Services

Support:
Leader, Safety Systems
Leader Business Excellence
Leaders from across the Organization

COMMITMENT DATE
June 30, 2025

#4: Leader Safety Performance Reporting Process	
OBSERVATION	**RECOMMENDATION**
The current process for periodically reporting safety performance to leaders has inconsistencies in both the approach and data reported. Currently, diverse means, including One Calgary, JWHSC meetings and safety work plans, as well as the Safety Dashboard, are utilized for communicating safety performance. From our sample review of reporting to two departments (Operational Services and Community Services), we noted the following: - Detailed safety reporting is provided to Operational Services through monthly safety reports whereas Community Services is only provided with safety work plans progress status. - JWHSC presentations are made within Community Services but not all Business Units participate in a JWHSC e.g., Partnerships BU. - There is no formal process in place to review and approve the safety report content presented to leaders. We identified inconsistencies in data provided to Operational Services leaders compared to information in the Safety Performance dashboard	4. The OHS Managers, Safety Operations and Manager, Strategic Services to design and implement a standardized leader safety reporting process, incorporating a defined approach, frequency of reporting, and review and approval process, as well as a requirement for leaders to analyze the information provided. **Management Response** Agreed The Managers, Safety Operations and Manager, Strategic Services to: - Assess current state through a business unit assessment on

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(e.g., days without lost-time claim (LTC) recorded as zero in the dashboard).

These inconsistencies in safety reporting arise from the lack of a formalized process. Without consistent, timely, and accurate information, leaders may not be aware of key trends or regulatory updates, which could limit their ability to mitigate safety issues or address trends in a timely and appropriate manner.

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reporting process, approach, report templates, frequency, and leader utilization.

- Consult leaders from across the Organization on what safety information is required for reporting purposes.
- Develop a Corporate-wide OHS reporting process, including templates, frequency, leader how-to use guides, and review and approval processes.
- Encourage leaders in business units to use OHS reports with employees.
- OHS to provide support to all leaders on the implementation of standardized reporting to all departments.

Lead

Managers, Safety Operations and Manager, Strategic Services

Support:
Leaders, Safety Operations, Leader, Business Excellence and
Leaders across the Organization

Commitment Date

December 31, 2025

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#5: Safety Dashboard Information	
OBSERVATION	**RECOMMENDATION**
The information in the Safety Dashboard does not contain sufficient complete and accurate data to support full awareness of safety performance, which in turn supports appropriate safety decisions and actions. The Corporate Safety Dashboard contains only lagging indicators – no leading indicators are being monitored to support safety prevention. In addition, the Corporate Safety Dashboard data comes directly from the safety incident reporting tool. However, there is no process established to review the data for accuracy. We identified inconsistencies and gaps in data, including:	5. The Manager, Strategic Services and the Managers, Safety Operations to enhance the Safety Dashboard to include data on both leading and lagging indicators of safety performance across the organization and implement a data accuracy review process. **Management Response** Agreed

• Inaccuracies in recording 'Days without an LTC' (showing Zero across The City as well as for each Department in prior years). • Missing metrics for some service lines e.g., Facility Management; and • Missing service lines/Departments e.g., the Chief Administrator's Office is not included in the Safety Dashboard. OHS is currently piloting an additional Safety Performance Dashboard which contains both leading and lagging indicators, but only includes Operational Services Department safety data. Due to FOIP limitations, the Safety Performance dashboard is available to Dept ID owners only to manage the confidentiality of the information provided.	The Manager, Strategic Services and the Managers, Safety Operations to: • Assess current Corporate OHS Dashboard and ensure all service lines, business units and Departments are included. • Consult with internal and external interested parties on the development of leading and lagging performance indicators. • Research industry best practices to develop both leading and lagging performance measures. • Enhance the Corporate OHS Dashboard with OHS leading and lagging performance indicators. • Implementation of a Corporate-wide safety dashboard. **Lead** Manager, Strategic Services and Managers, Safety Operations **Support:** Manager, Health and Safety Programs, Leader, Safety Systems, Leader, Business Excellence, Leaders, Safety Operations, Corporate Analytics and Innovation and Customer Service and Communication. **Commitment Date** December 31, 2025

Acknowledgments