

To: Council in Committee of the Whole

From: Jag Sharma, City Manager,
Office of the City Manager

Report Number: CNCL-18-57

Date of Report: June 22, 2018

Date of Meeting: June 25, 2018

Subject: Health and Safety Follow-up Audit

File: C-3100

1.0 Purpose

The purpose of this report is to present the KPMG Health and Safety Follow-up audit, which includes a review of motorized vehicle and equipment accidents (Attachment 1).

2.0 Recommendation

It is recommended to City Council:

That Report CNCL-18-57 dated June 22, 2018 and Attachment 1, being the KPMG Health and Safety Follow-up audit be received for information and that the recommendations and management responses in the KPMG audit be endorsed as the general basis for implementing improvements to health and safety.

3.0 Executive Summary

Not applicable

4.0 Input From Other Sources

The Health and Safety Follow-up audit by KPMG was conducted with the involvement of the appropriate City employees.

5.0 Analysis

The Council-endorsed 2018 Audit Plan is comprised of eight audits, as follows:

- Fleet management follow-up
- Absence management
- Workforce productivity data and information

- Real estate follow-up
- Enforcement processes
- Health and safety follow-up
- Reserves policy (added January 16, 2018)
- Council remuneration by-law (added April 9, 2018)

At the time of writing of this report, the Fleet Management Follow-up, Council Remuneration By-law audit and Reserves Audit are being finalized. This report delivers the Health and Safety Follow-up audit, which includes a review of motorized vehicle and equipment accidents. It is noted that due to the municipal election this fall there will be fewer opportunities to bring audits forward to Council later in the year. It is expected the Real Estate follow-up audit will be reported on in September, the three remaining audits will be reported on in the first half of 2019.

The Health and Safety Follow-up audit includes four medium risk recommendations related to the review of motorized vehicle and equipment accidents. The recommendations relate to the following aspects:

1. Vehicle collision database contents
2. Data analysis
3. Review of corrective actions and disciplinary steps
4. Supervisor and employee incident investigation reports

The Audit also includes a number of observations on the status of the implementation of the initial set of Health and Safety Audit recommendations, which are either implemented or partly implemented.

The KPMG recommendations and the City's management response will be the basis for implementing on-going improvements to health and safety.

6.0 Financial Implications

There are no financial implications at this time.

7.0 Relationship to the Oshawa Strategic Plan

This report responds to the goal of Accountable Leadership, the theme of Our Corporate Culture Demands Excellence and Respect.



Helen Break, Director, Strategic Initiatives,
Office of the City Manager



Visha Sukdeo, Executive Director
Human Resource Services
Office of the City Manager



Jag Sharma, City Manager,
Office of the City Manager



City of Oshawa

Motorized vehicle and equipment accident review / Health and Safety follow-up audit

Report rating for motorized vehicle and equipment accident review:

Yellow – Green: Significant assurance with minor improvement opportunities

KPMG LLP

June 2018

This report contains 34 pages

Appendices comprise 13 pages



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Appendices

- A. Motorized vehicle and equipment accidents – process overview
- B. Motorized vehicle and equipment accidents – sample testing
- C. Analysis of vehicle collision database
- D. Follow-up testing - incidents
- E. Staff involvement and documents reviewed

Distribution

To (for action):

- Glenn Thurston - Manager, Human Resources Services and Safety

CC (for information):

- Corporate Leadership Team
- Audit Team

Sponsor:

- Visha Sukdeo, Executive Director, Human Resource Services

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Section One

Executive Summary

Conclusion

This audit was undertaken in two parts. The first area of the review looked at processes around motorized vehicle and equipment accidents and we have provided a grading of “significant assurance with minor improvement opportunities’ (yellow/green) following our review. The second part of our work focused on following up recommendations in relation to our audit of Health and Safety from 2016. We have shown the status of the agreed actions and recommendations in this report.

The Corporation received a Commercial Vehicle Operators Registration (CVOR) warning letter in September 2017 from the Ministry of Transportation (MTO) due to an increase in accidents involving CVOR vehicles. We identified that steps have been taken by the Corporation since receiving this letter, including the implementation of disciplinary steps to help reduce the number of preventable accidents. There are on-going discussions with the MTO about the CVOR letter and solutions being discussed internally as to how to move forward. Examples of this include; maintaining regular contact with the MTO, communicating the importance of the Corporation maintaining their CVOR to staff, and undertaking mini audits and spot checks to ensure staff are following correct procedures when using vehicles/equipment. The increased analysis and oversight of accident data and corrective actions will also help the Corporation identify steps to help reduce the number of accidents going forward.

The process for reporting motorized vehicle and equipment accidents is documented in Safety Working Standard 02 - Accident and Incident Reporting and Investigations. Copies of the standards and other policies and procedures are available for staff to access on the Intranet, and make reference to the relevant legislative requirement such as the Highway Traffic Act and the Occupational Health and Safety Act. Our testing of a sample of accidents recorded on the vehicle collision database confirmed the relevant forms had been completed, and corrective actions had been undertaken where necessary to address the cause of the accident. We did however identify exceptions regarding the sign off of Supervisor & Employee Incident/Accident Investigation reports (IRs) and the reporting of these reports to the relevant Joint Health and Safety Committee (JHSC).

Our review of the vehicle collision database identified a number of additional areas where more data could be collected to help facilitate easier monitoring and oversight of accidents occurring. While we acknowledge that individual Supervisor & Employee Incident/Accident Investigation reports (IRs) are reported to the JHSC, we noted that there is no periodic assessment of accident data to help identify any common trends and patterns. We have provided some suggested areas of focus for management when analyzing the vehicle accident database. This also includes how common corrective actions or causes of accidents can be better captured, reported and communicated across the Corporation to help prevent similar accidents re-occurring. Please see Appendix C for further information.



Overall, we identified that the processes for reporting motorized vehicle and equipment accidents are in place, and for the sample of cases we reviewed we were able to evidence actions being undertaken to address accidents, such as review of training and operating procedures and re-testing staff. The areas for improvement we identified focus on how the Corporation can improve their oversight of motorized vehicle and equipment accidents as a whole, and how data can be utilized to identify trends and common corrective actions, with the aim of reducing the number of accidents going forward.

As part of our work we also followed up on the implementation status of the recommendations raised in our 2016 Health and Safety audit report. Of the eight recommendations raised, one has been assessed as implemented and seven partly implemented. Our follow-up identified a number of improvement opportunities; in particular around maintenance of a central training database and the follow-up of incomplete health and safety training. Further details of our follow-up findings can be found in section three of this report.

Background

This review forms part of the Internal Audit Plan for 2018 for the City of Oshawa (“City” or “Corporation”). In this review we have followed up on our previous work around health and safety of staff within the Corporation completed as part of the 2016 audit plan. As part of that review there was a key recommendation identified around the need for health and safety oversight and reporting related to incident and training completion. Health and safety in the workplace enables a positive work environment and should be a top priority for all organizations. It is important that appropriate monitoring and reporting activities are in place to increase the awareness and compliance of the Corporation’s health and safety policies and procedures.

As part of this review we have considered the improvements the City has made in the oversight of health and safety, an important element in quality health and safety practices and processes. Additionally, we have identified opportunities for improvement where the City may not have fully implemented the recommendation. In this internal audit we have also considered City-operated motor vehicles and motorized equipment accidents Corporation-wide and reviewed the mitigations in place.

Objectives

Objective	Description of work undertaken
<p>Objective one</p> <p>To review processes and controls relating to City-operated</p>	<p>We reviewed the current processes in place for City-operated motor vehicles and motorized equipment accidents as they relate to health and safety, including:</p> <ul style="list-style-type: none"> • How the processes of the Corporation align with workplace legislation;



Objective	Description of work undertaken
motor vehicles and motorized equipment accidents Corporation-wide	<ul style="list-style-type: none"> Any actions taken to ensure staff are aware of policies and procedures when an City-operated motor vehicles and motorized equipment accident has occurred; The data available related to City-operated motor vehicles and motorized equipment accidents and processes for collecting, reporting, and utilizing such information; The actions which have been taken to reduce the likelihood of City-operated motor vehicles and motorized equipment accidents; and Any other factors or changes that should be considered to better mitigate frequency of accidents.
Objective Two To review improvements made since the 2016 audit	<p>We reviewed the following:</p> <ul style="list-style-type: none"> Roles and responsibilities for health and safety across the Corporation; Whether changes to the governance and organizational structure are appropriate; Comparison to leading practices where available; and Any actions which could be taken to improve health and safety oversight throughout the Corporation <p>The aim of this objective was to assess the actions taken since the 2016 audit to improve health and safety oversight. We have followed up each recommendation from the audit in 2016, and identified the actions taken, and whether they have been appropriately completed.</p>

Areas of good practice

- ✓ **Accident and incident reporting process** – The process for reporting motorized vehicle and equipment accidents is documented in Safety Working Standard 02.
- ✓ **Disciplinary action** – Following the receipt of the Commercial Vehicle Operators Registration (CVOR) warning letter in 2017, the City implemented disciplinary steps for preventable accidents in order to help reduce the number of preventable accidents going forward.
- ✓ **Corrective actions to address accidents** – For each motorized vehicle and equipment accident tested we were able to evidence corrective actions being applied, from review of policies and procedures to re-training of staff.



- ✓ **IR reporting for incidents** – We were able to evidence IRs being reported to the relevant JHSC for each of the seven incidents where an IR was available.

Areas for development – review of motorized vehicle and equipment accidents

- **Vehicle collision database** - Our review of the database identified that some cells within the database are incomplete. In addition, during the course of our review we noted various headings which could be added to the database to help facilitate easier monitoring, oversight and analysis of accidents. **(See recommendation one – section two)**
- **Data Analysis** – During the course of our review we identified a number of opportunities for undertaking further analysis of data recorded on the vehicle collision database to help identify common trends or themes. **(See recommendation two – section two)**
- **Review of corrective actions and disciplinary steps** – Corrective actions to prevent accidents and disciplinary steps applied are not consistently recorded on the vehicle collision database. Whilst corrective actions are reviewed by the JHSCs there is no central record of corrective actions applied so any outstanding actions can be followed up. **(See recommendation three – section two)**
- **IRs – sign offs and reporting to JHSC** – Our testing of a sample of accidents and incidents identified exceptions regarding the sign off of IRs and reporting of IRs to the relevant JHSC. **(See recommendation four – section two)**

Areas for development – health and safety follow-up

- **Health and Safety training records** – There remains a lack of a consolidated system or process in place to capture staff training across the corporation as a whole. The template for branch level reporting of training completion percentages has not yet been put in place by the Health and Safety division. It is expected that this will be rolled out by the end of 2018.
- **Escalation process for non-completion of training** - The policy and procedure for supervisors, managers and directors to identify and follow up completion of mandatory Health and Safety training has yet to be implemented by the Corporation. Due to the lack of central records of training completion the Corporation cannot easily identify where staff have not completed mandatory health and safety training and therefore where follow-up is required.
- **JHSC requirements** - The JHSC ToR has been updated to reflect current structural and legislative requirements however is still in draft mode and has not yet been approved by the Ministry of Labour. In addition, we were unable to obtain a copy of the inspection schedule for JHSC C (Fire Services) and so could not confirm a schedule has been put in place.



- **Incident report review by Operational Safety and Training staff** – Our testing of a sample of accidents and incidents identified exceptions regarding the sign off and review of IRs by Operational Safety and training staff.
- **Annual review of policies and procedures** - A log of all policies and procedures has yet to be put in place and as such there is no central tracking system to identify when policies and procedures should be reviewed.
- **Volunteer health and safety training** - The majority of volunteers are provided with some form of orientation and safety awareness, however this does not apply to all volunteers. There has been no formal analysis of volunteer training needs or a decision from the City on whether training should be provided to all volunteers or not.

Recommendations raised – motorized vehicle and equipment accidents

Following our review of the processes and controls relating to motorized vehicles and equipment accidents, we have raised the following recommendations:

	High	Medium	Low	Total
Raised	0	4	0	4
Accepted	0	4	0	4

Please see section two of this report for further information

Follow up implementation status – health and safety audit follow-up

The table below provides a summary of the progress made against each of the eight recommendations raised in our November 2016 review. (High priority represents the most urgent and high risk category):

	High	Medium	Low	Total
Raised and accepted in November 2016	1	3	4	8
Implemented	0	1	0	1
Partly Implemented	1	2	4	7

Please see section three of this report for further details of our follow-up work performed.



Acknowledgement

We thank the staff involved for their help in completing this review.

Contact Information

The contacts at KPMG in connection with this report are:

Tony Malfara, Partner

Tel: (416) 777-3461

tmalfara@kpmg.ca

Nick Rolfe, Partner

Tel: (416) 777-3543

nicholasrolfe@kpmg.ca

Rob Hacking, Senior Consultant

Tel: (416) 777-5247

robhacking@kpmg.ca



Section Two

Recommendations

This section summarizes the recommendations that we have identified from our review of motorized vehicle and equipment accidents. We have given each of our observations a risk rating as follows:

Priority rating for recommendations raised

<p>High – (Priority One): Issues arising referring to important matters that are fundamental and material to the system of internal control. The matters observed might cause a system objective not to be met or leave a risk unmitigated and need to be addressed as a matter of urgency.</p>	<p>Medium – (Priority Two): Issues arising referring mainly to issues that have an important effect on the controls but do not require immediate action. A system objective may still be met in full or in part or a risk adequately mitigated, the weakness represents a deficiency in the system.</p>	<p>Low – (Priority Three): Issues arising that would, if corrected, improve internal control in general but are not vital to the overall system of internal control. These recommendations are of leading practice as opposed to weaknesses that prevent systems objectives being met.</p>
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#	Risk	Recommendation	Management response, owner and deadline
1	Med	<p>Vehicle collision database contents</p> <p><u>Issue:</u> During the course of our review we identified additional data which could be collected in the vehicle collision database to help facilitate easier monitoring and oversight of accidents. These include:</p> <ul style="list-style-type: none"> • Cause of accident; • Type of vehicle involved; • Severity of accident; • Corrective action applied (including re-testing); • Progress of implementation of corrective actions; • Any previous or current disciplinary steps applied; • Commercial Vehicle Operators Registration (CVOR) number (where relevant); • Whether the IR has been submitted to the JHSC; and 	<p>Management agrees with the recommendation</p> <p>1 – HR Safety staff will review and enhance the vehicle collision database in consultation with Operations staff. The suggested headings including developing a severity index will be included. However, for privacy reasons, disciplinary actions where individuals are identified will be tracked separately and its distribution limited.</p> <p>2 - HR Safety Staff will implement additional drop</p>

#	Risk	Recommendation	Management response, owner and deadline
		<ul style="list-style-type: none"> • Staff experience level; <p>We also identified a number of incomplete cells within the current database, such as times of accidents and vehicle ID numbers.</p> <p><u>Risk:</u> Failure to maintain up-to-date and accurate vehicle accident records affects the extent to which the City can analyse data and follow-up on corrective actions. The limited data collected at present could impact the quality of analysis and insights gleaned to prevent future accidents.</p> <p><u>Recommendation:</u></p> <p>We recommend management undertake the following:</p> <ol style="list-style-type: none"> 1. Review the suggested headings above for inclusion on the current vehicle collision database. 2. Assess how data will be captured under the included headings to help facilitate further analysis. E.g. through use of fixed drop down options in Excel. 3. Assess accidents on a pre-agreed scale of severity and include the severity of each accident on the database. 4. Review and update any incomplete fields within the current database. 5. Periodically review the contents of the vehicle collision database to ensure all fields are completed where required. 	<p>down features in the spreadsheet to enhance analysis. An IT solution for documenting and tracking collisions, and incidents and accidents would eliminate the need for continued manual tracking, which consumes significant time.</p> <p>3 - HR Safety staff will, in consultation with Operations staff, develop a severity index to be used in the collision analysis.</p> <p>4 - Current database will be reviewed and missing data added.</p> <p>5 - On a go-forward basis, the database will be reviewed for completeness on a monthly basis.</p> <p>Owner: Glenn Thurston, Manager HR and Safety</p> <p>Deadline: Q3 2018</p>
2	Med	<p>Data Analysis</p> <p><u>Issue:</u> While investigation reports are submitted to the JHSCs for review, there is no periodic review or assessment of accident data to identify common themes/trends.</p>	<p>Management agrees with the recommendation</p> <p>HR Safety reviews the nature of collision incidents but does not currently formally document these reviews. On a go-forward basis, a</p>

#	Risk	Recommendation	Management response, owner and deadline
		<p>We reviewed accident data across a three year period to identify any common themes or trends. Please see Appendix C for further information.</p> <p><u>Risk:</u> Failure to regularly analyse accident data could affect the City’s ability to identify and address key themes and causes of accidents and how they can be prevented going forward.</p> <p><u>Recommendation:</u></p> <p>A periodic analysis of the data within the vehicle collision database should be undertaken to help identify any common trends or themes. This should include a review of:</p> <ul style="list-style-type: none"> • Accidents by month, time and branch; • Accidents by vehicle type; • Ratio of preventable to non-preventable accidents; • Common “causes of accidents”; • Accidents by severity; • Common “corrective actions applied”; and • Staff experience levels <p>Please see appendix C for further information.</p>	<p>documented review and analysis will be provided to Directors and Managers on a monthly basis.</p> <p>Owner: Glenn Thurston, Manager HR and Safety</p> <p>Deadline: Q3 2018</p>
3	Med	<p>Review of corrective actions and disciplinary steps</p> <p><u>Issue:</u> Corrective actions are reviewed by the JHSCs for individual IRs. However there is no clear process in place to follow-up on any actions which remain outstanding.</p> <p>Disciplinary steps are applied by the City for staff involved in preventable accidents. Steps range from issuing of a care and concern letter through to suspension and removal of license. However, disciplinary steps are not always captured on the database, and there is no clear process to review and assess whether the correct disciplinary steps have been applied.</p>	<p>Management agrees with the recommendation</p> <p>Department Managers will review vehicle collision disciplinary steps. This is done by ensuring discipline is applied by the management supervisor in consultation with the operations manager and HR Consultant.</p> <p>1 - The collision database will now have an additional place to note the follow-up and HR</p>



#	Risk	Recommendation	Management response, owner and deadline
		<p><u>Risk:</u> There is a risk that corrective actions are not implemented in a timely manner which could increase the risk of accidents re-occurring.</p> <p><u>Recommendation:</u></p> <p>We recommend:</p> <ol style="list-style-type: none"> 1. The vehicle collision database outline any corrective actions which have not yet been implemented, and a periodic review and follow-up of these actions be undertaken. 2. A periodic review of the disciplinary steps applied to staff be undertaken to confirm steps are applied consistently and correctly. 	<p>Safety staff will review vehicle corrective actions as suggested in the Supervisors Incident/accident report.</p> <p>2 – A review of discipline undertaken in response to vehicle collisions will be added as a recurring topic on the agenda of Operations Managers’ meetings with HR Consultants and HR Safety Staff.</p> <p>Owner: Visha Sukdeo, Executive Director, Human Resource Services</p> <p>Deadline: Q4 2018</p>
4	Med	<p>Supervisor & Employee Incident/Accident Investigation Reports (IRs) – sign-offs and reporting to JHSC</p> <p><u>Issue:</u> Testing of a sample of 12 accidents and eight incidents identified the following exceptions regarding sign-off of IRs and reporting to the JHSCs.</p> <ul style="list-style-type: none"> • For one incident tested, a copy of the IR could not be obtained and so we were unable to confirm the relevant sign offs or reporting to the relevant JHSC; • For one incident and one accident tested the IR had not been signed off by the Supervisor and Manager respectively; • In 12 cases (four incidents and eight accidents) the IR had not been signed off by the Departmental Safety/Training Staff; • In five cases (all accidents) we were unable to evidence the IR being reported to the relevant JHSC; and • There are no timeframes in place by which IRs have to be completed and signed by. 	<p>Management agrees with the recommendation</p> <p>1 - The Corporation specific safe work standards outlining the protocols of collision incident/accident reporting – reminders and training will be provided.</p> <p>2 - As of 2018, the Corporation has implemented a double check system on signoff of Incident/collision reports by the supervisor and HR Safety or Training Division in Fire. A monthly audit of compliance with Safe Work Standard incident reporting protocols will be put in place.</p> <p>3 - As provided in documentation and training to the JHSCs, the</p>



#	Risk Recommendation	Management response, owner and deadline
	<p><u>Risk:</u> There is a risk of ineffective oversight of accidents/incidents where the correct level of reviews are not undertaken.</p> <p><u>Recommendation:</u></p> <p>We recommend the following</p> <ol style="list-style-type: none"> 1. City staff be reminded of the need to send all IRs to the Safety team. 2. IRs be signed off by all relevant officers and the report number recorded on the front page. Random spot checks of IRs should be undertaken to confirm compliance. 3. JHSC minutes should clearly document review of IRs through notation of the report number and any discussions around the incident/accident. 4. The City implement timescales in receiving sign-offs on IRs. 	<p>Secretary must now document incident numbers received and reviewed at each JHSC meeting. The JHSC minute format and agenda list will reflect the change. HR Safety will ensure documentation and review of incident reports are completed by the JHSCs.</p> <p>4. Current Safe Work Standards will be amended to ensure ongoing continuity of signoff during staff absences. Monthly auditing of the process will be implemented to ensure timeliness of sign-offs.</p> <p>Identifying possible IT solutions for both incident reporting and tracking of training records has begun. This entails a requirements analysis with stakeholders, market review of software vendors and budget submission. Submissions to ISSC on safety software requirements are complete.</p> <p>Owner: Glenn Thurston, Manager HR and Safety</p> <p>Deadline: Q3 2018</p>



Section Three

Summary of follow-up work performed

We have assessed the progress made by the Corporation against the recommendations raised in our November 2016 audit report of Health and Safety. A total of eight recommendations were raised in our 2016 review; including one high risk, three medium risk and four low risk recommendations. Our follow-up findings can be seen in the table below. We have assessed each recommendation as either implemented, partly implemented, or not implemented, and raised further recommendations where appropriate. Where recommendations in this section have been followed-up as part of our review of motorized vehicle and equipment accidents, we have referenced the relevant appendix where this was assessed, and the recommendation number in section two if any further recommendations were raised.

#	Risk	Recommendation and 2016 management response	KPMG March 2018 observations	Further Management comments
1	High	<p>H+S related information</p> <p><u>Recommendations</u></p> <p>A. In the short term, reporting is developed by the Manager, H&S to compile incident and training statistics (e.g. number of incidents, types of incidents, training completion percentages) for the whole Corporation.</p> <p>B. Reporting should occur on a routine basis (quarterly to Directors and CLT, and bi-annually to Council) on H&S training completion and incidents to allow effective oversight. Serious/critical incidents should be escalated more promptly as necessary.</p> <p>C. In the longer term, the Corporation should identify possible IT solutions</p>	<p>Partly Implemented</p> <p><u>Incidents</u></p> <p>Incidents are now tracked on an Excel spreadsheet maintained by Health and Safety and investigation reports reported to the Joint Health and Safety Committees periodically. Further analysis of the database and testing of incidents has been undertaken as part of this review. We identified exceptions following our review of a sample of incidents and the sign-off of IRs. See Appendix D for further information and recommendation four of section two.</p> <p><u>Training</u></p> <p>The template for branch level reporting of training completion percentages has not yet been put in place by the Health and Safety division. It is expected that this will be rolled out by the end of 2018. Training records are held within multiple spreadsheets by the Health and Safety division, and through paper copies at branch level, and therefore there remains a lack of consolidated</p>	<p>Management agrees with KPMGs observations</p> <p>A - All operations managers and supervisors are aware of and reminded to ensure staff safety training is documented and communicated to HR Safety for record keeping.</p> <p>Templates for Branch level reporting of training completion rates will be rolled out to the entire Corporation.</p>



#	Risk	Recommendation and 2016 management response	KPMG March 2018 observations	Further Management comments
		<p>for both incident reporting and training records. These should be considered in the context of the overall IT systems in place and the strategy for HR and IT. The training record system should be linked to the employee record. For incident reporting, enhancements to PeopleSoft may be one option, but if the system is not able to be developed to meet the needs of the Corporation, other systems may need to be considered.</p> <p><u>November 2016 management response</u></p> <p>A – Agreed – Deadline: Q3 2017</p> <p>B – Agreed – Deadline: Q3 2017</p> <p>C – Agreed – Deadline: Q4 2018</p>	<p>system or process in place to capture staff training across the corporation as a whole.</p> <p>Staff are required to complete basic occupational health and safety training regardless of their role within the corporation. However, we were unable to determine whether all staff had completed this training as accurate training records are not currently held. The “Safety and Training Database” highlighted a number of staff who had not completed this training, however when discussed with HR we were informed that some staff may have completed this training, with completion rates stored in a separate spreadsheet. The Manager, Human Resources Services and Safety and the Health and Safety Supervisor are in the process of integrating these records together, enabling them to identify more easily which staff have not completed the training.</p> <p><u>IT system solutions</u></p> <p>The Corporation’s Technology Workgroup are actively working on a scope for an IT system to record accidents and incidents and a separate system for training. Once the scopes have been agreed upon the plan is to work with external IT Consultants and enter the marketplace to find a solution in the Summer of 2018; with the aim of having the selected systems rolled out in early 2019.</p>	<p>B - Training completion rates will be distributed to HR Safety for analysis and regular reporting. Elements of this process are waiting to be finalized after the finalization of the “mandatory training matrix” is completed.</p> <p>C - HR Safety will review the current database to assess the potential to consolidate a workable system. HR Safety will continue to audit training gaps/completeness and implement a new escalation procedure.</p> <p>An IT solution for documenting and tracking staff safety training would eliminate the need for continued manual tracking, which consumes significant time.</p>



#	Risk	Recommendation and 2016 management response	KPMG March 2018 observations	Further Management comments
				Owner: Glenn Thurston, Manager HR and Safety Deadline: Q4 2018.
2	Med	<p>Current organizational support for H+S</p> <p><u>Recommendation:</u> We recommend considering combining H&S resources in Corporate H&S and Fire Services to allow more effective co-ordination of resources across the whole Corporation. This will also help to ensure a member of staff can be accountable for H&S across the whole Corporation. While acknowledging the uniqueness of training required in Fire Services, processes could be made consistent in some H&S training. This could also help to provide support to departments in developing required safety protocols.</p> <p><u>November 2016 management response</u> Agreed – Deadline: Q3 2017</p>	<p>Implemented</p> <p>The Manager, Human Resources Services and Safety and the Health and Safety Supervisor met with Fire Services in 2017 to discuss synergies in resourcing of Health and Safety staff within corporate and fire services. The Manager, Human Resources Services and Safety also undertook a survey across local municipalities (seven responses received) of which none combined corporate and fire services health and safety resources together. An overall decision was made to keep resources split due to the varying nature of health and safety training across both areas.</p>	N/A
3	Med	<p>Training requirements of staff</p> <p><u>Recommendation:</u> In order to ensure consistency of the process an exercise should be undertaken by departments and branches to identify minimum H&S expectations of all roles in their area, with additional training added as required. HR</p>	<p>Partly Implemented</p> <p>HR is in the process of putting a health and safety training matrix together, which will show the minimum health and safety training requirements by position and by branch. This is hoped to be rolled out in Q3 of 2018 as per the original due date recorded above. These</p>	<p>Management agrees with KPMGs observations</p> <p>Owner: Glenn Thurston, Manager HR and Safety Deadline: Q3 2018</p>



#	Risk	Recommendation and 2016 management response	KPMG March 2018 observations	Further Management comments
		<p>should review this to ensure completeness and consistency where appropriate.</p> <p><u>November 2016 management response</u></p> <p>Agreed – Deadline: Q3 2018</p>	<p>minimum training requirements will be built into the spreadsheets maintained by HR.</p> <p>A checklist (Supervisor Employee Safety Orientation Guide) has been rolled out across Operations, Recreation, Maintenance and MLE for new employees to record any training needs. This is due to be rolled out to the remaining areas of the Corporation by June 2018.</p>	
4	Med	<p>Escalation process for non-completion of training</p> <p><u>Recommendation:</u> We recommend that a follow up process needs to be developed and articulated by HR, with responsibility for training completion at the Director level. This should include identification of reminders to undertake training to the staff member, escalation to their manager if training does not occur within a defined time period and further escalation to the Director and Commissioner for continued non-compliance.</p> <p><u>November 2016 management response</u></p> <p>Agreed – Deadline: Q2 2017</p>	<p>Partly implemented</p> <p>The procedure for Supervisors/Managers/Directors to identify and follow-up completion of mandatory Health and Safety training is in progress but has yet to be fully implemented and rolled out across the Corporation. Due to the lack of central records held of training completion the Corporation cannot easily identify where staff have not completed mandatory health and safety training and therefore where follow-up is required.</p>	<p>Management agrees with KPMGs observations</p> <p>The draft Safety Training Escalation Safe Work Standard will be shared with relevant staff for consultation purposes prior to implementation. The pending consultations on the mandatory training matrix and implementation will assist in the clarity of responsibility including escalation and actions.</p> <p>Owner: Glenn Thurston, Manager HR and Safety</p>



#	Risk	Recommendation and 2016 management response	KPMG March 2018 observations	Further Management comments
				Deadline: Q3 2018.
5	Low	<p>JHSC requirements</p> <p><u>Recommendation:</u></p> <p>We recommend:</p> <ul style="list-style-type: none"> A. Updating the JHSC ToR to reflect legislative and City changes. B. Implement a process in order to track when incident reports are provided to the JHSCs. C. Formalize inspection schedules for JHSC C (Fire Services), F (Adult Crossing Guard) and G (Municipal Law Enforcement Officers) D. Moving forward, the H&S department should consider collecting inspection schedules from all JHSCs annually to assess the appropriateness and completeness of the schedules. In addition, consider auditing inspection reports to see if they are being performed and if performance is occurring in a timely manner. <p><u>November 2016 management response</u></p> <p>A – Agreed – Deadline: Q2 2017</p>	<p>Partly Implemented</p> <p>The JHSC ToR has been updated and a draft copy was presented to the Union for feedback in Q1 of 2017. However, a response from the Union has yet to be received, and so the revised ToR has yet to be sent to the Ministry of Labour for formal approval. It was unknown at the time of the audit when a response from the Union is expected. Management should contact the Union for feedback on the draft ToR and following this, send the ToR to the Ministry of Labour for final approval.</p> <p>JHSC secretaries have been instructed to document the incident/accident investigation report number within the committee minutes so as to evidence reports being reviewed. However, our testing of a sample of motorized vehicle and equipment accidents as per Appendix B identified further exceptions with regards to tracing the reports through to the relevant committee. See recommendation four in section two for further details.</p> <p>As part of our follow-up work we also tested a sample of incidents from the “Incidents Database” to confirm reports had been submitted to the relevant JHSC. We confirmed in all cases tested that the relevant committee had received the reports.</p> <p>Inspection schedules for JHSC F (Adult Crossing Guard) and G (Municipal Law Enforcement Officers) have now been put in place and copies of these were verified by audit. However we were unable to obtain a copy of the</p>	<p>Management agrees with KPMGs observations</p> <p>A - The Corporation is waiting for union response and will be submit to the MOL once this is received.</p> <p>B - While JHSC C (Fire Services) have an established monthly inspection and cleaning protocol as part of their Station Maintenance Operating Guideline, a separate centralized schedule will be established for tracking purposes.</p> <p>Owner: Glenn Thurston, Manager HR and Safety</p> <p>Deadline: Q3 2018.</p>



#	Risk	Recommendation and 2016 management response	KPMG March 2018 observations	Further Management comments
		<p>B – Agreed – Deadline: January 2017</p> <p>C – Agreed – Deadline: Q1 2017</p> <p>D – Agreed – Deadline: Q4 2017</p>	<p>inspection schedule for JHSC C (Fire Services) despite being told a schedule has been put in place.</p> <p>Inspection reports are reviewed on a periodic basis by the Manager, Human Resources Services and Safety to ensure they are being carried out in line with the schedule. We selected a sample inspection due in February 2018 from the schedule for JHSC G and confirmed an inspection report had been completed.</p>	
6	Low	<p>Incident report review by Operational Safety and Training staff</p> <p><u>Recommendation:</u> We recommend the H&S team emphasize the importance of completing the “actions section”, and audit incident reports periodically to obtain assurance reports are being assessed to determine the appropriateness of preventable actions and identification of further training, where deemed necessary.</p> <p><u>November 2016 management response</u></p> <p>Agreed – Deadline: February 2017</p>	<p>Partly Implemented</p> <p>We confirmed that the importance of completing the action section of the incident report was communicated following our 2016 audit review.</p> <p>However, our testing of a sample of motorized vehicle and equipment accidents as per Appendix B identified further exceptions with regards to the sign off of the investigation reports. We also tested a sample of incidents from the “Incidents Database” to confirm reports had been appropriately signed off. Our testing identified further exceptions regarding the sign off of the investigation reports. See Appendix D for further information and recommendation four of section two.</p>	<p>Management agrees with KPMGs observations</p> <p>Please refer to management response in recommendation four of section two.</p>
7	Low	<p>Annual Review of Policies and Procedures – OHS Part III Section 25.(2)(j)</p> <p><u>Recommendation:</u></p> <p>A. Establishing a review protocol to illustrate the frequency at which</p>	<p>Partly Implemented</p> <p>The Manager, Human Resources Services and Safety reviews 1/3 of all relevant Health and Safety policies annually. As such, each policy is reviewed at least once every three years, however this may be more frequent if</p>	<p>Management agrees with KPMGs observations</p> <p>The Corporation has developed a new log and audit system to</p>



#	Risk	Recommendation and 2016 management response	KPMG March 2018 observations	Further Management comments
		<p>H&S policies and procedures will be reviewed.</p> <p>B. Creating a log of all policies and procedures (including the JHSC ToR and department specific safety protocols) where the last review date can be tracked. In addition, the log should be periodically monitored to ensure it is in accordance with the review protocols developed.</p> <p><u>November 2016 management response</u> Agreed – Deadline: April 2017</p>	<p>there are any changes in legislation which need to be reflected in policies.</p> <p>A log of all policies and procedures has yet to be put in place and as such there is no central tracking system to identify when policies and procedures should be reviewed.</p> <p>Policies which make reference to critical and serious injuries across the Corporation have been updated to clearly reflect what the OHSA defines as critical and serious injury.</p> <p>The City should create a log of all policies and procedures (including the JHSC ToR and department specific safety protocols) where review dates can be tracked, therefore enabling the City to identify policies with upcoming review dates.</p>	<p>ensure compliance with the review protocol. Action on this recommendation is now complete.</p> <p>Owner: Glenn Thurston, Manager HR and Safety</p> <p>Deadline: Q2 2018.</p>
8	Low	<p>Volunteers at the Corporation</p> <p><u>Recommendation:</u> We recommend identification of volunteers across the Corporation and tracking these individuals to ensure H&S training is provided as necessary.</p> <p><u>November 2016 management response</u> Agreed – Deadline: June 2017</p>	<p>Partly Implemented</p> <p>The majority of volunteers are provided with some form of orientation and safety awareness, however this does not apply to all volunteers. There has been no formal analysis of volunteer training needs or a decision from the City on whether training should be provided to all volunteers or not.</p> <p>A formal analysis of the training needs of City volunteers should be undertaken and a decision made on how training completion will be monitored.</p>	<p>Management agrees with KPMGs observations</p> <p>90% of various City volunteer groups provide some form of orientation/safety awareness. HR Safety staff will work with Operational areas who use volunteers to review their volunteer on boarding programs and have them</p>



#	Risk	Recommendation and 2016 management response	KPMG March 2018 observations	Further Management comments
				establish a system of tracking training completion. Owner: Glenn Thurston, Manager HR and Safety Deadline: Q2 2019.



Appendices

Appendix A: Motorized vehicle and equipment accidents – process overview

In line with the agreed terms of reference for this review, we have reviewed processes and controls in place relating to City-operated motor vehicles and motorized equipment accidents across the Corporation. In particular, we have focused on how corrective actions are identified and implemented to prevent accidents from reoccurring. We have also reviewed the level of reporting undertaken to the Joint Health and Safety Committees (JHSC). Details of our findings can be seen below. We have tested compliance with the numbered controls in Appendix B of this report. Any references to recommendations in Appendices A – D refer to those recommendations in section two of this report.

Process	Control	KPMG comments on design
<p>↓</p> <p>Accidents are reported to a Supervisor by phone.</p>	<p>↓</p> <p>Process notes are in place confirming staff members and supervisors responsibilities regarding the reporting of accidents</p>	<p>↓</p> <ul style="list-style-type: none"> ✓ We confirmed through analysis of the Safety Working Standard (SWS) 02 - Accident and Incident Reporting and Investigations - that responsibilities of staff and supervisors in relation to accident reporting are clearly outlined. ✓ Copies of the SWS's are available on the Intranet for staff to access.
<p>The Supervisor reports the accident to the Operations Safety and Training Supervisor, or another member of the Safety team.</p>	<p>Separate procedures are in place for "out of hours" reporting of accidents</p>	
<p>↓</p> <p>A member of the Safety team and the on-call Supervisor attend the accident scene</p>	<p>↓</p> <p>A Vehicle Accident Report is completed by the Operations Safety and Training Supervisor or another member of the Safety team (1)</p>	<p>↓</p> <ul style="list-style-type: none"> ✓ The Vehicle Accident Report includes key sections for recording information including accident details, information about the vehicles involved,

Process	Control	KPMG comments on design
<p>The cause of the accident is discussed with the staff member, Supervisor and a member of the Safety team</p>	<p>A Supervisor & Employee Incident/Accident Investigation report ("IR") is completed and signed by the Supervisor and the member of staff involved in the accident (2)</p>	<p>accident diagrams and statements from drivers.</p> <ul style="list-style-type: none"> ✓ The IR includes key sections such as whether injury was sustained, description of the accident, corrective actions suggested and action undertaken by departmental safety/training staff.
<p>Corrective actions are suggested and discussed between the Safety team, Employee and the Supervisor</p>	<p>The IR is completed and signed by the Manager and corrective action undertaken where appropriate (3)</p>	<ul style="list-style-type: none"> ✓ The IR includes tick-box options for "Cause of accident" and "corrective actions" so Supervisors and Managers can easily categorize actions. ✓ The IR includes sections for sign off from the Employee, Supervisor and Manager.
<p>The IR, and the suggested corrective action, is reviewed by the relevant Manager</p>		
<p>The IR is sent to the Safety team for review and sign off</p>	<p>A "Progressive disciplinary steps for at fault Vehicle Incidents or Collisions" document is completed by the relevant Supervisor and Manager for all preventable accidents</p>	<ul style="list-style-type: none"> ✓ Disciplinary levels are in place across the City, from receipt of a care and concern letter through to suspension and removal of license. The "progressive disciplinary steps for at fault Vehicle Incidents or



Process	Control	KPMG comments on design
<p>The City impose disciplinary steps for staff involved in preventable accidents</p> <p>Any re-testing or re-training of staff is undertaken by the Safety team where required</p>	<p>The IR is completed and signed by a member of the Safety team once actions have been confirmed and any re-testing/training completed (4)</p>	<p>Collisions” policy states the different steps of the disciplinary scale and how they are applied.</p> <ul style="list-style-type: none"> • There are no timeframes in place by which investigation reports have to be completed and signed by. Our testing in Appendix B identified periods of up to three weeks between signatures e.g. between Supervisor and Manager sign-offs. (See Recommendation Four) • Corrective action is not recorded on the Vehicle Collision database. While corrective actions are reviewed by the JHSCs for individual IRs, there is no central record which shows outstanding actions, enabling them to be followed up. (See Recommendation Three)
<p>The accident is recorded on the Corporations “Vehicle Collision Database”</p> <p>A copy of the Supervisor & Employee Incident/Accident</p>	<p>A central record of accidents relating to motorized vehicles and equipment accidents is maintained by the Safety team</p>	<ul style="list-style-type: none"> • Our review of the “Vehicle Collision Database” identified that some cells within the database are incomplete. In addition, during the course of our



Process	Control	KPMG comments on design
<p>Investigation report and the Vehicle Accident Report is kept on file</p> <p>A separate copy of the Supervisor & Employee Incident/Accident Investigation report is sent to the Manager, Human Resources Services and Safety</p>		<p>review we noted various headings which could be added to the database to help facilitate easier monitoring, oversight and analysis of accidents. (See Recommendation One)</p>
<p>Supervisor & Employee Incident/Accident Investigation reports are reported to the relevant Joint Health and Safety Committee (JHSC)</p>	<p>The investigation report number is noted in the relevant meeting minutes to indicate the report has been reviewed (5)</p>	<p>✓ There are a number of JHSCs across the City who meet on a regular basis to discuss health and safety matters, including the review investigation reports.</p> <ul style="list-style-type: none"> • There is no periodic analysis of accident data or review of any common trends (e.g. accidents by time/location/branch). (See Recommendation Two). <p>We have undertaken our own analysis of the Vehicle Collision Database and commented on any common trends/patterns from the data provided. Please see Appendix C for further information.</p>



Appendix B: Motorized vehicle and equipment accidents – sample testing

We have undertaken testing across a sample of 12 accidents from the vehicle collision database and tested compliance with the numbered controls in Appendix A. Details of our findings can be seen in the tables below.



Observations

- ✓ In all cases tested a Vehicle Accident Report had been completed
- ✓ In all cases tested the “Supervisor & Employee Incident/Accident Investigation report” (IR) had been signed off by the Employee and Supervisor
- In one out of 12 cases the IR had not been signed off by the Manager. In addition, there are no timeframes in place by which IRs have to be completed and signed by. In four cases tested, while the relevant sign offs had been obtained there were delays between 2-3 weeks in signing off of forms. **(See Recommendation Four)**
- In eight out of 12 cases the IR had not been signed by a member of the Safety team to confirm the corrective actions. **(See Recommendation Four)**
- ✓ As part of our testing we were able to evidence corrective actions being undertaken to address accidents. This included the following:
 - Review of policies and procedures from Employee, indicated and signed off on the IR;
 - Changes made to existing SWS’s;
 - Removal of licenses and re-testing of employees by the Safety team;



Observations

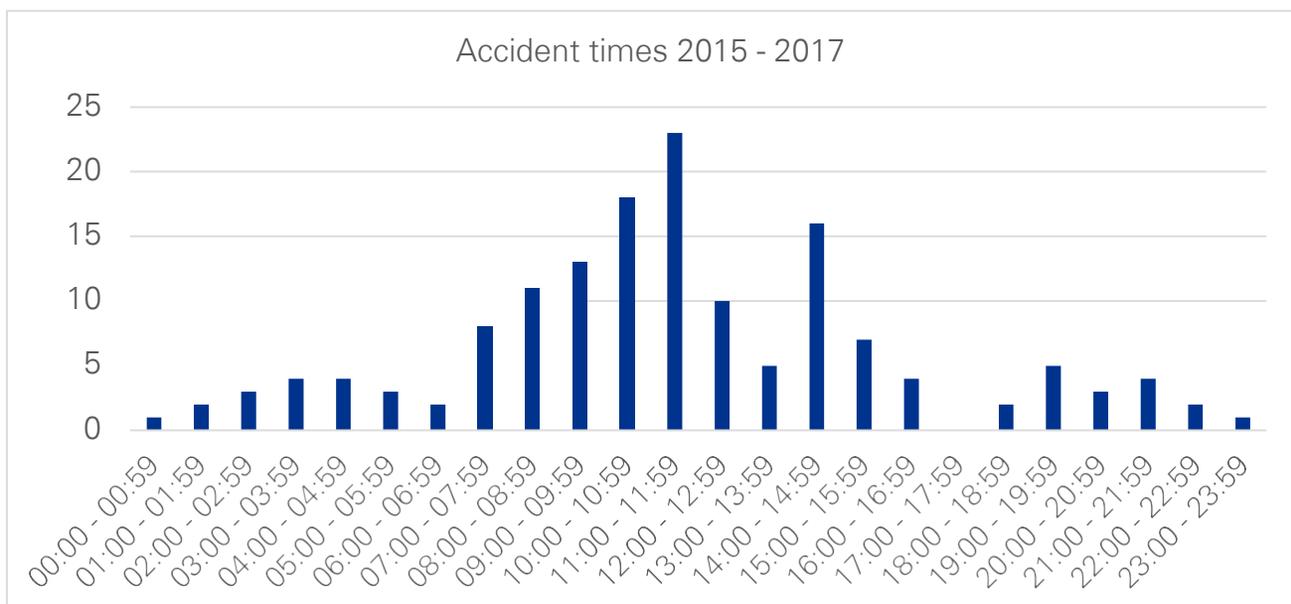
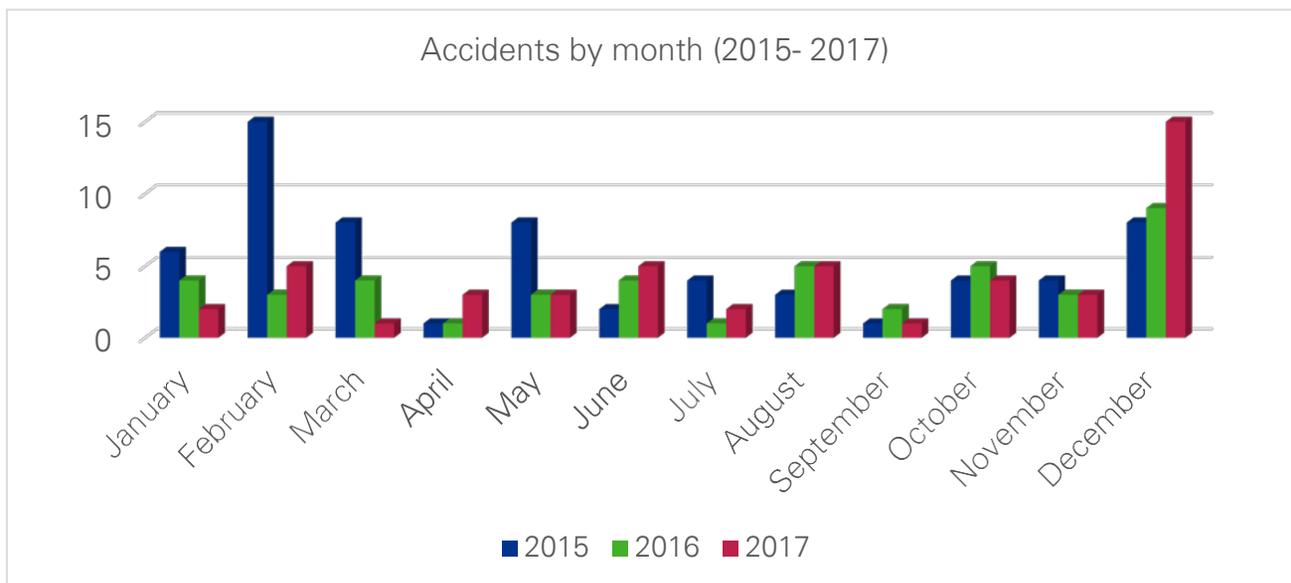
- Application of disciplinary actions including issuing of letters of concern and warning letters;
 - Email reminders sent to branch Supervisors to remind their staff of duties when operating Vehicles; and
 - Review of the accident scene and removal of any obstructions/objects to prevent an accident from reoccurring.
- In five out of 12 cases we were unable to evidence the IR being reported to the relevant JHSC. We noted in some instances that the IR number had not been recorded on the top of the report, and our review of the minutes of the JHSC identified some references to “reports without an IR number recorded”. **(See Recommendation Four)**

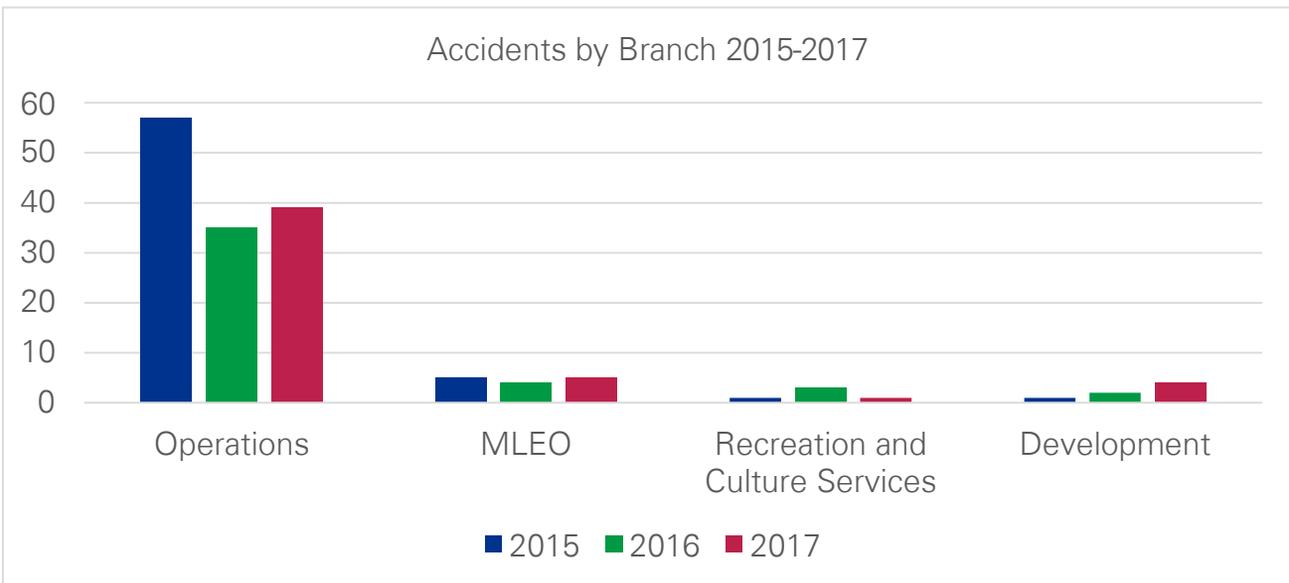
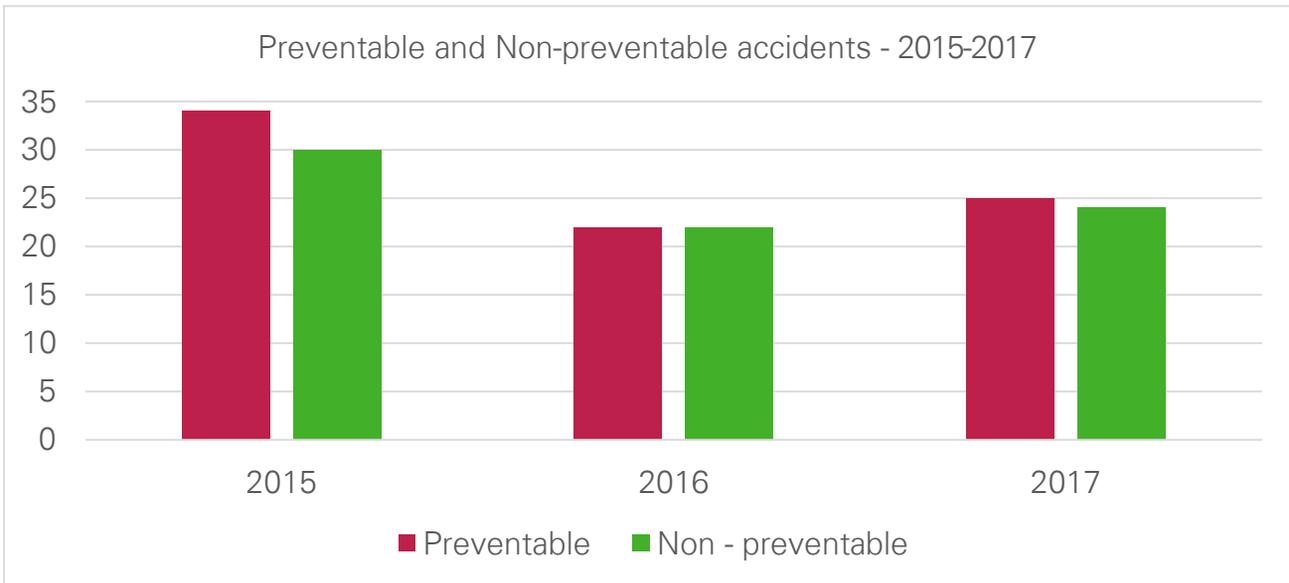


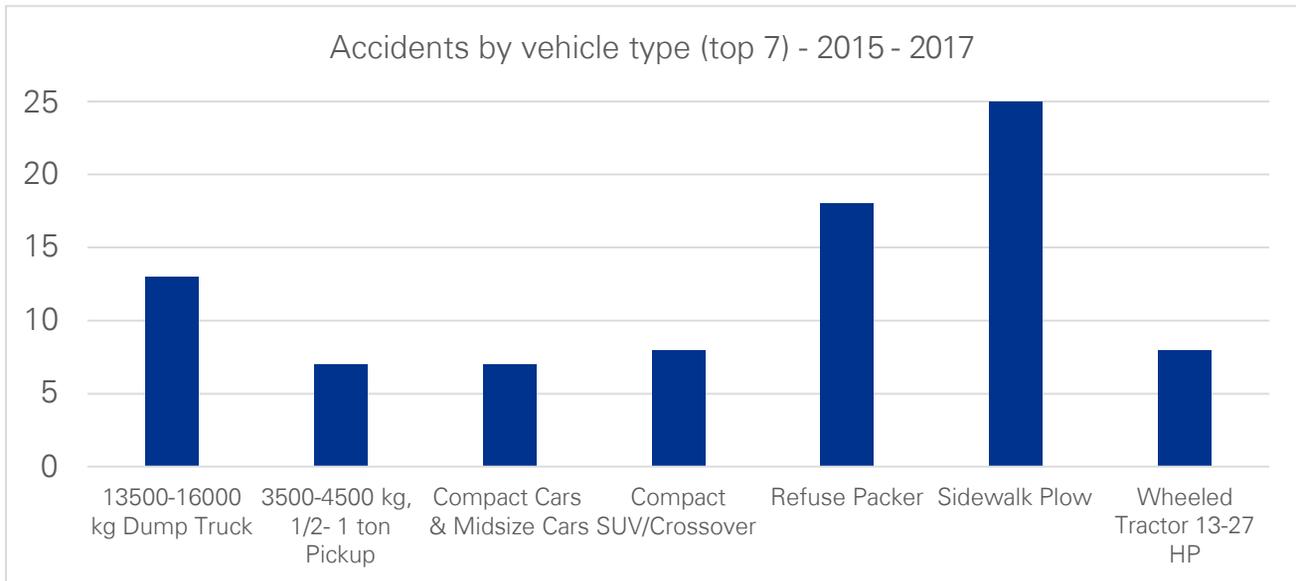
Appendix C: Analysis of Vehicle Collision Database

We have undertaken further analysis of the vehicle collision database across motorized vehicle and equipment accidents recorded between 2015 and 2017 and the data available. This has included analysis of accidents by month, time, branch, equipment type* and preventability. A total of 157 accidents were recorded on the database between 2015 and 2017. Our findings can be seen in the graphs below.

**"Equipment type" is not included as a heading on the current vehicle collision database however we determined the equipment type based on the "vehicle number" column and cross referencing the numbers against the "2018 Equipment list by class department" spreadsheet provided to us by the Safety team*







Our analysis above identified common themes around months of accidents (February and December), time of day (11:00 – 11:59am) and vehicle type (sidewalk ploughs). The above information should be reviewed by management on a periodic basis to assess particular areas of focus, or help form decision making on how to help prevent accidents occurring going forward. In addition, management should consider periodically reviewing the ratio of preventable to non-preventable accidents and consider how preventable actions can be reduced going forward. **(See Recommendation Two)**

Additional analysis

As part of our review we also identified further analysis which could be undertaken by the City, however the data was not contained within the vehicle collision database and so was not easily accessible during the course of the audit. This includes analysis to identify trends/common themes as per the above, and also analysis across individual accidents to confirm processes have been followed appropriately.

Trend Analysis

- Review of common “causes of accidents” to identify any common reasons as to why accidents are occurring;
- Review of the number of accidents by severity and whether the number of accidents classed under a medium-high level of severity are reducing over time;
- Review of “corrective actions applied” to identify any common corrective actions, and sharing these with other City branches. Our discussions with a sample of Supervisors identified that the process of sharing common actions across the Corporation could be improved; and



- A review of “staff experience levels” recorded for accidents within the period. For example, if a large majority of accidents occurring relate to staff with minimal levels of experience, the City should consider whether the training provided is appropriate and sufficient.

(See Recommendation Two)

Individual accident analysis

- A review of accidents with outstanding corrective actions and following up with the relevant branch to confirm all corrective actions have been completed;
- A review of disciplinary steps applied to staff and assessment of whether steps were applied correctly and consistently.

(See Recommendation Three)



Appendix D: Follow-up testing – Incidents

As part of our follow-up work we have performed testing across a sample of incidents taken from the Incident Database, which follow a similar process in terms of reporting as the motorized vehicle and equipment accidents process as per Appendix A. Our testing focused on the sign off of the Supervisor & Employee Incident/Accident Investigation report” (IR) from the Safety team (recommendation six in section three of this report) and the reporting of incidents to the relevant JHSC (recommendation five in section three). As an additional test, we also confirmed whether IRs had been signed off by the Employee, Supervisor and Manager. Our findings are as follows.



Observations

- ✓ In one case tested a copy of the IR could not be obtained and so we were unable to confirm whether this had been signed off by the Employee, Supervisor, Manager and Safety team; or whether the IR had been presented to the JHSC. **(See Recommendation Four)**
- For the remaining seven IRs in one case the IR had not been signed off by the Supervisor. In addition, there are no timeframes in place by which IRs have to be completed and signed by. In three cases tested, while the relevant sign offs had been obtained there were delays between 2-3 weeks in signing off of forms. **(See Recommendation Four)**
- In four out of the remaining seven cases the IR had not been signed by a member of the Safety team to confirm the corrective actions. **(See Recommendation Four)**.
- ✓ Despite the exceptions identified in the sign off of IRs we were able to identify corrective actions being documented in all seven cases where an IR was available. In



Observations

the one case where an IR was not accessible by the Safety team we were able to evidence an email sent out to branch supervisors reminding them of the need to send IRs to the Safety team following an incident/accident.



Appendix E: Staff involvement and documents reviewed

We undertook interviews from February 2018 to March 2018 with key stakeholders to inform this work, including:

Name	Title
Visha Sukdeo	Executive Director, Human Resource Services
Glenn Thurston	Manager, Human Resources Services and Safety
George Herc	Supervisor, Operations Safety and Training
Lindsay Allward	Supervisor, Operations Services
Aili Oberson	Supervisor, Recreation and culture services
Chris Rutherford	Supervisor, Municipal Law Enforcement

We received the following documentation over the course of fieldwork:

- Vehicle collision database and incident database
- Policies and procedures relating to health and safety and accident/incident reporting
- Safety Working Standards
- A sample of accident/incident investigation reports and follow-up action applied
- A sample of JHSC meeting minutes
- Progressive disciplinary steps for at fault Vehicle Incidents or Collisions” document
- CVOR warning letter
- Inspection schedules for JHSC F and G and an example inspection report
- Example training databases held by the Safety team
- A sample of vehicle accident reports
- A draft copy of the ToR presented to the Union