



February 4, 2010

Re: Employers' Advocacy Council (EAC) Submission on the JHSC Certification Program

The Employers' Advocacy Council (EAC) wishes to thank the WSIB for this opportunity to provide our submission on the Joint Health and Safety Committee (JHSC) Certification Consultation Paper.

EAC and its members are fully supportive of the concept introduced back in early 1990 with respect to the JHSC Certification Program and believe that this program adds value to injury/illness prevention in Ontario. That said, our members have a fundamental issue with the composition of the Certification Review Committee which appears to be heavily weighted by Labour and Health and Safety Associations (HSA's) representation, giving the impression of a self serving model reflected throughout the Committee's recommendation.

The consultation paper states that participants (over 120,000 certified) feedback has been favourable. The document also states that there is lack of understanding of the certification process, inconsistent training delivery by providers and inconsistent approaches to hazard assessment among employers. The Paper does recognize the need to address the challenges posed by the changing world of the workplace in Ontario.

It is in this spirit that we provide the following recommendations on behalf of the employers of Ontario with the focus on improving and enhancing the certification program:

Course duration for Part One

EAC strongly disagrees with recommendation, as indicated, currently the process varies in length of program delivery from 2-5 days.

The responsibility is and remains with the WSIB to ensure that service providers do meet the Learning Objectives as outlined in the Certification Standards document which was updated January 2007, WSIB has the responsibility and ability to review this standard on a regular basis or as needed. It is our belief that for the training to succeed we must focus on quality, participant interaction and above all knowledge transfer, not course duration.

WSIB has the mandate and authority to monitor ALL approved providers and address any shortcomings dealing with delivery quality.

Interactivity/Course Content

EAC supports any improvement in the program through interactive activities. With a cautionary note that, according to the WSIB Certification Standard, the *Comprehension level* should be in the range of grade 5 to grade 8, program should use plain language as much as possible.

Hazard Assessment Template for Part Two

EAC supports the development of a hazard assessment tool to assist employers in identifying their respective Workplace – Specific Hazard Training needs, a list of “significant” hazards by sector would be of assistance.

Sector-specific program approach for Part Two might work in some cases but not all. We support employers choice of choosing either sector-specific or hazard assessment identifying needs.

Implementing Expiration Period for Certification Status

EAC does not support expiration period for certification status, however, we encourage certification maintenance points through active learning (ex. CMP, CRSP model) this will ensure maintaining currency with emerging health & safety issues and knowledge. A refresher certification course can be another option as long as it is no longer than one day with focus on reviews.

Non-Classroom Courses

EAC supports other training options/methods, in today's technology age the use of eLearning is an acceptable way for knowledge transfer, cost effective, allows for flexibility, with younger generation born with the technology savvy and access to technology source. However, WSIB needs to ensure tracking tools/test in place to maximize effectiveness and compliance.

Evaluation/Validation

EAC supports the present standard evaluation, using multiple choice questions with the instructor responsible to verify learning on an ongoing basis. Standard final evaluation must be the responsibility of the instructor to administer, score and provide results to WSIB. These evaluations must be developed by WSIB to ensure consistency, we also recommend instructor issuing a temporary validation card (part one) with a maximum of twelve months timeline to complete part two.

Instructor Competence

EAC supports a standard competency requirement for instructors, this must be administered by WSIB with provisions for minimum session delivery/year, course evaluation, instructor performance as minimum.

Certified Member Support Mechanism

EAC does not support additional mechanism/access to resources, Ontario is blessed with four Health & Safety Associations (HSA's) fully funded by employers with a mandate to provide resources, information, and training to Ontario workplaces. In addition, the following also provides great value information and resources such as the WSIB, MoL, WHSC, CCOHS, IWH, and the list goes on.

Additional Comments:

Certification Delivery Methodology:

Currently, 58 providers are approved by the WSIB to deliver Part One Certification, 12 Health & Safety Associations (including Labour Organizations), 44 Private Consultants, and 2 employers with in-house approved programs.

EAC supports this open market strategy, by allowing multiple delivery organizations to provide workplaces with a choice in selecting their provider, this will also avoid the creation of a perception of a system monopoly. WSIB must continue to ensure that the Learning Objectives are adhered to, and regular audits are carried out to ensure quality delivery.

On behalf of the EAC and its 400 plus members, I would like to extend our appreciation for the opportunity to provide our views, and look forward to WSIB's positive consideration of this submission.

Respectfully Yours;

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Employers' Advocacy Council