MNP

Summary Report of Stakeholder Engagement for Workplace Illness and Injury Strategy

Prepared for Workers Compensation Board of Manitoba

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EXECUTIVE SUMMARY

INTRODUCTION AND BACKGROUND

In 2013, Manitoba published *Manitoba's Five-Year Plan for Workplace Injury and Illness Prevention* (the Five-Year Plan). The Five-Year Plan called for prevention services to be unified and consolidated, separate from both enforcement and compensation. SAFE Work Manitoba (SWMB) was established as the consolidated public agency responsible for prevention and has been operating since 2014.

The Workers Compensation Board of Manitoba (WCB) is beginning development of its next Five-Year Strategy for Illness and Injury Prevention. To support this work, the WCB sought input from key stakeholders on the effectiveness of SWMB's strategic initiatives, service offerings and activities that should be considered in development of the next Five-Year Plan. MNP was engaged as an independent third party to assist this process.

MNP conducted in-person, individual or small group interviews with representatives of 12 key stakeholder organizations that are either directly involved in implementing the strategies in the Five-Year Plan or directly impacted by the plan. Interviews were conducted from January 22, 2018 to February 22, 2018.

Themes arising from the stakeholder engagement are summarized below, followed by MNP observations and recommendations.

THEMES ARISING FROM STAKEHOLDERS

Serving the Principles in the Five-Year-Plan

There was general agreement among stakeholders that a dedicated entity for safety prevention in Manitoba is valuable. This focus allows SWMB to develop knowledge and best practices. There is still some confusion among employers regarding the distinct roles of SWMB, the WCB and Workplace Safety and Health (WS&H), which results in reluctance by some employers to approach SWMB for assistance.

Manitoba not yet clearly a prevention leader. While noting that injury rates have gone down and the establishment of industry-based safety programs (IBSPs) is significant progress, most stakeholders felt they needed more information on results achieved in order to comment on Manitoba as a prevention leader.

Efforts could be better focused to where they are needed most. Some stakeholders felt that emphasis on certification focuses resources on employers that already have well-established safety programs, instead of the many employers in Manitoba that have little in place. Some stakeholders also felt that there is duplication in activities between SWMB and industry-based safety programs (IBSPs) and that SWMB should work more closely with stakeholders to truly understand and address the gaps.

More information is needed to support the principle of accountability. Most stakeholders want SWMB to articulate clear outcome measures and reports against those measures to understand the impact and value of

the investments in SWMB. There is also a desire to understand what the role of the organization is intended to be in the context of industry partnerships to deliver programming.

Safe Work Manitoba's Role as a Partner in Injury Prevention

SWMB should champion prevention and facilitate delivery by industry. Stakeholders generally agreed that there is an important role for SWMB in public awareness and standards. Delivery of actual programming should be done by IBSPs, industry and other Manitoba organizations.

Partnership involves meaningful collaboration. Stakeholders acknowledge SWMB efforts to engage them in a variety of ways. Some are frustrated this engagement has had little perceived impact. Industry stakeholders felt that improved collaboration would benefit SWMB promotions, prevent duplication, and help to address persistent gaps.

Industry-Based Safety Programs

Expanding IBSPs is positive and has increased access to relevant services and supports for employers. IBSPs recognize the value of industry-specific knowledge and resources, drive industry to take responsibility for their own safety initiatives, and provide a safe, familiar place for employers to seek help with their safety programs. Most agreed that SWMB plays an important role in enabling IBSPs.

There is still work to be done to engage key industries that are not served by an IBSP. There are still sub-sectors of existing IBSPs and other industries that are not yet engaged in an industry-based program.

There is concern regarding the funding model for IBSPs. IBSPs expressed concern with the sustainability of the levy-funded model – as injury rates and WCB premiums go down, the percentage of the levy must go up. The current funding model does not generate enough revenue to support development efforts for new IBSPs and external revenue sources are important to all IBSPs. Activities related to business development have, in some cases, absorbed valuable resources that would be better spent serving their members.

Employers should be aligned with IBSPs based on work place risk versus rate code. Some stakeholders felt that assigning employers to an IBSP via rate code may not be the best fit for their actual work environment, and that there should be some flexibility for an employer to be differently aligned, based on work activity and associated risk.

SWMB is overly intrusive with IBSPs. Complaints of micromanagement and intrusive oversight arose from both established and new IBSPs. There is a significant concern that SWMB is dictating what the IBSPs should be doing, contrary to the concept of 'industry-led'.

Reliable communication is important. Some IBSPs are frustrated with the consistency and completeness of information received from SWMB and WCB.

SWMB role in promoting IBSPs. All IBSPs raised concerns that SWMB promotion activity put SWMB forward as the primary source of prevention support, to the exclusion of IBSPs.

SAFE Work Certified/Prevention Rebate

Medium and large employers pursuing certification. In all sectors except construction, IBSPs expect only a few of their larger members are ready for or have the resources to pursue certification in the next few years. Small businesses are finding the amount of effort required to certify overwhelming. Employers of all sizes in the construction sector continue to pursue COR and SECOR (small employer COR). Half of the stakeholders interviewed were concerned that the emphasis on certification as the objective versus building safety systems may limit value to employers with the greatest need.

Prevention rebates have some, though limited value as an incentive. While mostly supportive, there were some mixed opinions on use of the prevention rebate as an incentive. A few stakeholders, including the Manitoba Federation of Labour (MFL), expressed a clear preference for rebates based on demonstrated safety programs versus claims experience. Most reported that the prevention incentive is not the primary driving factor behind certification, but it is a positive factor in the overall return on investment for safety. However, as ISBP levy rates increase to offset decreasing general premium rates, the margin between the prevention rebate and levy has been shrinking. There was agreement among stakeholders that for employers that do not have most systems in place, the prevention rebate is too small compared to the costs of certification to be a meaningful incentive.

There needs to be greater recognition of equivalency/reciprocity. All IBSPs had concerns regarding the current state of equivalency/reciprocity of certification among IBSPs and other recognized safety standards.

There are challenges with SAFE Work Certified audit administration. A few stakeholders felt that the required SWMB safety auditor course has limited value and does not recognize or respect the professional safety expertise in Manitoba outside of SWMB. IBSPs also noted frustration with SWMB's detailed scrutiny of certification audits. To avoid potential bias, the MFL would like the union(s) to select the employees involved in the certification audit.

Training

SWMB's role should be more in development of training and training standards, less in delivery. While SWMB has an important role in developing training standards, most stakeholders questioned SWMB's role in training delivery. Most felt that SWMB should deliver training only where there are clear gaps in training available through IBSPs or others in Manitoba. The MFL feels there has been effective collaboration between themselves and WCB/SWMB regarding training and other resources.

Targeted Strategies

Vulnerable workers. Generally, stakeholders are supportive of SWMB efforts to have materials available in other languages to accommodate new Canadians. Most stakeholders were also supportive of SWMB and Safe Workers of Tomorrow efforts to ensure youth and their parents have an awareness about safety. A few stakeholders provided suggestions to enhance supports for new Canadians and young workers.

Supports for small business. While many stakeholders acknowledged the efforts to develop materials for small business, there are still gaps that are limiting progress. All stakeholders felt that small business safety programs

need to be simple and achievable and small employers will likely require one-on-one support. Stakeholders felt that even though SWMB has a small employer path intended for workplaces with less than 20 employees, many small businesses are not ready for certification, especially those with five employees or less.

Workplace mental health. Most stakeholders had limited knowledge of SWMB initiatives related to mental health. Those who were familiar indicated that the SWMB strategy essentially reflects supportive approaches for good organizational culture. A concern was expressed with SWMB attention to matters that extend beyond prevention of compensable conditions, while supports for front-line personnel who routinely face traumatic events remain an area of need. There was general acknowledgement that safety professionals are not experts on mental health issues and there is a need to involve the medical community and human resource experts. Opinions as to regulation of workplace mental health were mixed; some, including the MFL, feel it should be part of the regulatory structure, while others feel that beyond measures related to workplace violence and harassment, mental health is not something that can be legislated.

Access to Data and Information

Stakeholders are generally pleased with access to information. Information and statistics are used by stakeholders to build awareness, to target prevention strategies and outreach, and to monitor trends. Several indicated additional information that would be helpful includes causal factors (to help target risks) and company information reported based on number of employees.

Effectiveness of SAFE Work Manitoba General Services and Supports

Information, resources, tools. Stakeholders acknowledged the extensive information available in brochures and print materials. Two stakeholders expressed a need for information and tools to be available using modern technologies such as mobile apps and provided examples from other provinces. Some suggestions were offered to improve the functionality of the SWMB website. Some stakeholders identified a need for more responsive service in certain areas.

Public awareness campaigns. Most industry stakeholders acknowledged a significant investment is being made in public awareness promotions. There were mixed opinions on the focus and value of the campaigns. Industry stakeholders questioned the emphasis on development of the SAFE Work brand to the exclusion of IBSPs. Industry expressed some concern that promotions vilify the employer; the MFL commented that terms like "work safely" inappropriately put the onus on the worker.

SAFE Work Store. Those who commented indicated concerns that the SAFE Work Store focuses exclusively on promoting SWMB, versus increasing awareness of all safety resources and supports. IBSPs identified opportunities for cross-promotion and co-branding.

Measuring Success

There is a desire for more, and more targeted progress reporting. Many stakeholders are interested in understanding the return on investment so far, including the baseline and indicators of progress on the Five-Year Plan and SWMB. Suggestions were provided regarding information and measures that would be useful to understand progress on prevention in Manitoba.

Achieving Further Progress

Priorities for prevention. The two most common priorities for prevention put forward by stakeholders were engaging company executives and focusing on areas of unmet need, including employers with little in place and without access to industry-based services. Other priorities include promoting the benefits of safety and worker involvement for workplaces of all sizes, educating young workers and new Canadians, and making safety mandatory, through expectations of suppliers.

Barriers to achieving desired outcomes. Most stakeholders agreed key barriers include workplace culture and small business capacity. Other barriers include a lack of resources to reach employers not currently engaged with an IBSP, and some challenges with current regulations.

Other Considerations for the Next Five-Year Plan

Prevention Committee composition. IBSPs would like to see more representation on the Prevention Committee from the health and safety community, including IBSPs, to address a perceived knowledge gap on the committee.

Inclusion of return-to-work in IBSP mandate. Several stakeholders argued that return-to-work is an important part of prevention and believe access to best practices in return-to-work and assistance in program design are a natural extension of an IBSP's mandate.

More representation of workers and unions on safety councils. The MFL suggested there should be more union and worker representation on IBSP safety councils.

KEY THEMES FOR CONSIDERATION IN NEXT FIVE-YEAR PLAN

Key summary themes arising from the stakeholder engagement for consideration in the next plan are identified below.

1. **Clarify the role of SWMB** – Clarify the role of SWMB, particularly in relation to development of standards/programs versus delivery of services, and in the context of the relationship with and roles of industry partners. Consider the intent and approach for monitoring IBSP activity, the role of SWMB in the certification process, and the role of SWMB in generating awareness of industry resources.

2. **Review the funding model**– Under the current funding model (percentage levy), improvements in safety mean the levy percentage will need to continually increase. Inadequate funding is causing IBSPs to target activity that generates revenue. Developing a base of user-paid services takes time, and may take resources away from basic service delivery to primary members. The urgency for revenue can also cause competition instead of encouraging cooperation among IBSPs.

3. **Continue the focus on gaps that remain from the previous plan** – Stakeholders identified a number of key elements of the last plan that warrant continued focus, including small business, young workers, training standards, the PTSD aspect of mental health, executive-level focus and mentorship, and continued work to develop industry-based prevention.

4. **Promote accountability and transparency** – Stakeholders are keen to understand what progress is being made. A clear set of performance measures within the strategy will help make clear the expected return on investments in prevention, and can be used to monitor and publicly report annual progress on identified goals. Including the activities of IBSPs in annual reporting will help to provide a broader picture of what is being accomplished.

MNP RECOMMENDATIONS

MNP reviewed the stakeholder concerns with WCB and SWMB senior management and gathered insight from the organization on the identified issues. The following represents MNP's independent analysis and recommendations on the major themes identified by stakeholders. More detail, including the WCB's perspective, is included in Section 5 of this report.

Funding for IBSPs

Funding IBSPs through an industry levy is consistent with the concept of 'industry funded, industry led' programming. The reward for success, in terms of lower WCB claims costs and thus premiums, however, is the levy becomes a continually higher percentage of the WCB premium.

Recommendation 1: As a partial, quick fix solution**,** the WCB could change shift how it illustrates the levy on employer statements, for example to express it as a dollar amount per $100 payroll versus a percentage of the WCB premium.   In such a manner, employers can compare any changes in the investment they are making per year outside of the context of the WCB premium.

Recommendation 2: Consider supplementing levy funding with funds from general assessment revenue to support investments in awareness / marketing or development of curriculum, tools or content, particularly where it could have broader use. A condition of the additional funding may be that the resulting work be shared, and not duplicate existing resources.

SAFE Work Certified

A key value of the certification program is the standard it sets. It establishes what is considered necessary for an effective safety program and orientation in an organization. For many employers, certification may be unreachable, and they may disengage before progressing further.

Recommendation 3: MNP recommends packaging web-site communication and supporting materials to emphasize the program as a *standard* for effective safety programs (vs the current emphasis on the audit and certification process) to help employer understand the elements, what it looks like in practice, where to start, etc. to broaden the use and value of the program.

Role of SAFE Work

The original design concept for SAFE Work identified a strategic relationship and respective roles of SWMB with industry and market providers as partners in injury prevention, with SWMB establishing standards, and where necessary content development, and IBSP's and market providers as service delivery providers.   Training previously offered by WSH such as health and safety committee training would be continued by SWMB.

Recommendation 4: Consistent with the original design, MNP recommends SWMB focus on standards and minimize direct service delivery. As the legislated authority on prevention, SWMB has an important role in establishing or recognizing satisfactory standards (for programs, training, training providers, audits, auditors, etc.) to ensure accurate and consistent quality of safety programming. This is important and valuable to employers, who can then have confidence their investments in prevention are aligned with regulatory requirements and best practices.

SWMB's role may also include development of content or curriculum that requires up-front investment and delayed payback which can be difficult for IBSPs. Such development should be conducted where a priority need has been identified in consultation with stakeholders or statistical data (as confirmed with stakeholders) and done in *collaboration* (see IAP2 description) with industry partners to ensure the end product provides the required value.

Where it is confirmed there is no IBSP, labour or market alternative, or an approach needs to be piloted or tested, it may be warranted for SWMB to directly deliver some programming as a temporary measure.   As with all of the above, effective communication with stakeholders is important to ensure a common understanding of needs and gaps, and to prevent duplication or perceived competition.

Relationship with IBSPs

Oversight: The contract with SAFE Work, and ultimate responsibility for ensuring an IBSP is meeting its obligations, rests with the host organization Board of Directors. It is therefore reasonable that the WCB engage with the organization at this level for required oversight**.** MNP agrees the reports identified as required in the IBSP Funding policy are reasonable and appropriate.   Imagine Canada Standards for Non-Profit Governance[1] indicate the Board of Directors should review this type of information at least twice per year.   It would be reasonable for the WCB to require the Board to provide evidence that it has done so.   More frequent confirmation or detail (quarterly) may be warranted if an organization is considered higher risk. The extensive quarterly reporting requirements in the funding agreement go well beyond policy requirements and could reasonably be considered both intrusive and a significant administrative burden.

Recommendation 5: MNP recommends the WCB continue to require an annual plan and budget to demonstrate the IBSPs intended application of funds, and annual reports demonstrating implementation or variance from the plan and use of funds. MNP further recommends the funding agreement reporting requirements be limited to those in the policy.

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[1] Imagine Canada Standards Program for Canada's Charities & Nonprofits, 2012.

Collaboration and Engagement: Both stakeholders and the WCB identified challenges related to stakeholder engagement.

Recommendation 6: MNP recommends the WCB consistently formalize its approach to stakeholder engagement so that it can have greater confidence in the input received and enable stakeholders to have greater confidence that they will be heard. This includes:

- A clear request for input, indicating who is being asked to respond and the process. In the case of organizations with IBSPs, the request may need to recognize the Safety Council and the host association (senior management and/or the Board of Directors) may have different views and provide a process or explanation of how responses should be handled.

- Clearly communicate the WCB's intentions for the stakeholder engagement and corresponding commitment to participants. The IAP2 Spectrum for Public Engagement[2] (Appendix D) provides a useful guide for this purpose. For example, the organization's goals may range from "Inform" to "Collaborate", and the associated commitment on use of the information changes accordingly. Misunderstandings can occur if stakeholders believe they are being asked to collaborate, when the organization's intended commitment was more at the 'Inform' or 'Consult' level.

- Provide a summary of 'what we heard' back to stakeholders so that they may see their input was heard. This should include some analysis – key themes or indications of where there is consensus and where there may be conflicting perspectives the WCB will need to recognize.   Where warranted (extensive time investment by stakeholders, significant policy or program decisions, etc.) *explicitly ask for confirmation* that the views have been thoroughly and correctly represented, and update the summary as needed.

- Provide information on how stakeholder input influenced the ultimate decision, and the rationale for decisions that diverge from stakeholder advice.

From MNP's review, SWMB defined the engagement process reasonably well on the Certification project and fed back the input to participants. The main opportunity appears to lie in the first and last two steps identified above.

Promotion: MNP's review of the SAFE Work website indicates there is IBSP information present, but with a low profile, and not in all places it would be expected.

Recommendation 7: MNP recommends SWMB review its overall promotion strategy with the included goal of increasing awareness of the services available through IBSPs (and others if appropriate). MNP also recommends SWMB increase the profile of IBSPs on the SAFE Work website so that employers can easily find these resources.

Measuring success - Accountability & Transparency

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[2] International Association for Public Participation

As a division of the WCB, SAFE Work Manitoba reports on its performance in the WCB Annual Report. The WCB maintains a Prevention Dashboard for reporting to the Board of Directors which includes more information than in the Annual Report. This includes goals and targets for

- number and severity of injuries ✓
- participants attending training (SWMB and IBSP) (✓SWMB only)
- percentage of employers and workers served by an IBSP ✓
- access to prevention related information and data
- number of employers SAFEWork Certified ✓
- prevention awareness engagement and behavior

(Items with results reported in the 2017 Annual Report are indicated with a ✓)

Recommendation 8: MNP recommends including clear performance measures and targets in the next prevention plan, with at least the full content in the existing Prevention Dashboard. Reporting this information in future Annual Reports will then enable stakeholder understanding of the expected and realized impact of investments in prevention. Including progress achieved through IBSPs is important to an overall strategy in which they play a key part.

In the short term, given the repeated request for performance metrics, MNP recommends providing links to the appropriate page in the annual report from the SAFE Work website to make this information easier to find.

1   INTRODUCTION AND BACKGROUND

In 2013, Manitoba published *Manitoba's Five-Year Plan for Workplace Injury and Illness Prevention* (the Five-Year Plan). The Five-Year Plan called for prevention services to be unified and consolidated, separate from both enforcement and compensation. SAFE Work Manitoba (SWMB) was established as the prevention services provider. Governance of SWMB is provided by the Workers Compensation Board of Manitoba's (WCB) Board of Directors through the Prevention Committee that includes WCB Board members, representatives of stakeholder groups, and appointed government representatives. SWMB has been delivering prevention services since 2014.

Progress on key goals in the Five-Year Plan has been made, including expansion of industry-based safety programs (IBSPs), development of SAFE Work Certified, the Prevention Rebate program, ongoing development of education and public awareness on workplace injury and illness prevention, a Musculoskeletal Injury Prevention Strategy, a Psychological Health and Safety in the Workplace Strategy and Young Worker Injury Prevention Strategy. An Occupational Disease and Illness Prevention Strategy was established in 2017 to increase focus on these challenging and less understood workplace risks.

The WCB is beginning development of its next Five-Year Strategy for Illness and Injury Prevention. To support this work, the WCB sought input from key stakeholders on the effectiveness of SWMB's strategic initiatives, service offerings, and activities that should be considered in development of the next five-year plan. MNP was engaged as an independent third party to assist this process.

2   METHODOLOGY

2.1   PROJECT PLANNING AND INITIATION

MNP met with the project Steering Committee to review and confirm the work plan, identify key stakeholders, areas of inquiry, and background information to be provided. Based on this discussion, MNP prepared a stakeholder engagement guide with further feedback from the Committee.

2.2   STAKEHOLDER CONSULTATION

MNP conducted in-person, individual or small group interviews with representatives of 12 key stakeholder organizations from January 22, 2018 to February 22, 2018. These organizations were:

- WCB Prevention Committee
- Manitoba Employers Council
- Manitoba Federation of Labour
- Winnipeg Construction Association Inc. / Construction Safety Association of Manitoba
- Manitoba Heavy Construction Association Inc. / WORKSAFELY
- Manitoba Trucking Association / RPM Trucking Industry Safety

- Canadian Manufacturers & Exporters Manitoba / Made Safe

- Manitoba Motor Dealers Association Inc. / Motor Vehicle Safety Association of Manitoba

- Keystone Agricultural Producers Inc. / Farm Safety Program

- Mining Association of Manitoba Inc.

- Workplace Safety and Health Branch (WS&H)

- Self-Insured Industry-Based Safety Program

The individuals participating in the consultation with these organizations are listed in Appendix A.

Participants were provided with the stakeholder engagement guide in advance, which included the interview topics and links to background information on SWMB and its activities. The engagement guide is included in Appendix B.

Stakeholders were also invited, though not required, to provide additional input through a written submission. Written submissions were received from two organizations and are included in Appendix C.

Following development of findings from stakeholder input, MNP interviewed the CEO of the WCB and the COO of SWMB to gather information and organizational perspective on the issues identified by stakeholders.

2.3   LIMITATIONS

The findings in this report represent the input provided by a select set of key stakeholder organizations, and those invited to participate in discussions by those organizations. It cannot be considered representative of all those with whom SWMB comes in contact, or all stakeholders generally. There is limited input from those that would have no connection to an established IBSP or the identified labour and employer organizations.

Feedback was received from one labour organization, the Manitoba Federation of Labour (MFL), which is the umbrella organization for unions in Manitoba. While only one of the stakeholder groups interviewed, the MFL is considered to broadly represent the position of organized labour. With permission, the MFL's input is identified in this report to recognize this context.

Some stakeholders interviewed did not offer comment on all topics. Stakeholders were also not asked to comment on input from other participants, which may have identified further consensus or disagreement.

Further research was not conducted to verify or quantify the issues raised.

3   CONSULTATION FINDINGS

Themes arising from the stakeholder engagement are identified below. *Unless specifically noted, all statements reflect the opinions and perspectives offered by stakeholders and have not been verified or corrected by MNP.*

3.1   SERVING THE PRINCIPLES IN THE FIVE-YEAR PLAN

Question:

The last Five-Year Plan for Workplace Injury and Illness Prevention identified four key principles:

- Making Manitoba a prevention leader
- Improved services, where they're needed most
- Accountability, balance and fairness
- A stronger role for all workplace stakeholders

SAFE Work Manitoba was established to unify and consolidate prevention services as a single point of contact and to enable a clear focus on preventing workplace injury and illness in Manitoba. Do you believe SAFE Work is effectively focused on the principles in the plan?

A dedicated entity for safety prevention is valuable

There was general agreement among stakeholders that a dedicated entity is a positive thing for Manitoba. A single focus allows SWMB to develop knowledge, best practices, etc.

Half of stakeholders noted that there is still some confusion among employers regarding the distinct roles of SWMB, the WCB, and WS&H. Despite the division, as a government entity, some employers believe that information provided to SWMB would be shared freely with WS&H and the WCB. For this reason, and a general distrust of government, some employers are still reticent to approach SWMB for assistance. This point was made in the context of confirming the need for services to be delivered through industry partners.

Most stakeholders commented that SWMB seems to be growing in terms of staff and bureaucracy. There is a desire to understand the purpose and the return on this investment.

Not yet a prevention leader

The majority of stakeholders had limited comment on Manitoba being a leader, noting more information on results achieved would be needed to know. It was observed that injury rates have gone down, but it may be due to many things. Establishing more IBSPs is seen by most stakeholders, including labour, to be significant progress. One stakeholder indicated SWMB has led the way on occupational illness, developing technical expertise, strategies, and engaging the community. Another stakeholder indicated more needs to be done if Manitoba wants to be a prevention leader. Other provinces, such as BC and Ontario, are perceived to be further ahead.

Concern that efforts are not yet focused where they are needed most

Concern was expressed by a few industry stakeholders that the emphasis on certification focuses resources where there may be little to gain. Employers that can pursue certification at this point already had well-established safety programs. Many employers in Manitoba have little in place. A different approach is needed to make progress with these companies as certification is an unrealistic goal in the short term.

Some stakeholders also expressed concern that SWMB is using resources to duplicate activity that is already available from IBSPs or the marketplace generally, such as training and consulting. It was felt that SWMB should work more closely with stakeholders to understand where there are gaps that SWMB could effectively address.

More information is needed to support the principle of accountability

Most stakeholders expressed a need for clear outcome measures and reports against those measures to understand the impact and value of the investment that has been made in SWMB. Many stakeholders expressed concern with the apparent investment – including the number of staff, office space, and extensive advertising campaigns – and would like to understand what has been accomplished, and what the role of the organization is intended to be in the context of industry partnerships to deliver programming. There is a clear interest in effectively defining and monitoring the intended return on investment. One stakeholder group stated that ultimately, the financial benefits of reductions in illness and injury to the WCB system should exceed the cost of prevention services, including SWMB and IBSPs. Labour did not offer comment in this area.

3.2 SAFE WORK MANITOBA'S ROLE AS A PARTNER IN INJURY PREVENTION

Questions:

One of the key action areas in the plan was a renewed role for business as a safety partner. The WCB and SAFE Work Manitoba share the vision of: *"A trusted partner, insuring today and building a safer tomorrow".*

- What does SAFE Work's role as a partner mean to you? What does that look like?
- What is your (or your organization's) experience working with SAFE Work as a partner?

Champion prevention and facilitate cooperation to enable delivery by industry

The majority of stakeholders feel that SWMB can be most effective as a champion of prevention. Delivery of actual programming should be done by safety professionals employed by IBSPs, industry and other Manitoba organizations. One stakeholder specifically stated, "We feel that the existing safety expertise in Manitoba is not being recognized or respected." SWMB should lead by acting as a resource for and facilitating cooperation within the health and safety community and fostering awareness of workplace safety and available resources. One stakeholder emphasized that SWMB has an important role to establish the foundations, for example to establish, administer and continually improve professional training and program standards.

Partnership involves meaningful collaboration

All stakeholders spoke to the need for meaningful collaboration with SWMB. This was variously described as discussion, agreement, and cooperation, including on what programs and services are needed, who should offer them, and where organizations should work together. While labour and two other stakeholders felt there has been effective two-way communication and consultation with SWMB, all industry stakeholders felt that SWMB promotions and efforts would benefit from improved collaboration.

While SWMB has actively sought to engage stakeholders on technical committees and other topics, most felt their input and advice is not seriously considered, and SWMB proceeds with its original plan. Two stakeholders provided their experience as part of the SAFE Work Certified Stakeholder Advisory Committee as an example.

Both new and existing IBSPs indicated that better collaboration would prevent duplication and help to address persistent gaps. One IBSP provided further examples of failed collaboration (auditor training, mobile app for regulatory information), where the results were costly, took considerable time, and did not address the original need.

SAFE Work advised that the majority of individuals on the SAFE Work Certified Stakeholder Advisory Committee represent employers, who proposed changes to the SAFE Work Certified Auditor training. SWMB control over auditor training and certification was crucially important to Labour in the development of the certification program. Work continues to ensure that all stakeholders are supportive of any changes to the program.

3.3   INDUSTRY-BASED SAFETY PROGRAMS

> ***Questions:***
>
> Please comment on your knowledge or experience of SAFE Work's activity to support and expand Industry-Based Safety Programs (IBSPs).
>
> - Has this activity/these programs had an impact on access to relevant safety and health services?
> - Any comments on the partnership approach for this program?   Funding model?

Expanding IBSPs has increased access to relevant services and supports for their members

There was consensus that the development of IBSPs is positive and will increase access to relevant services. Some explained that it recognizes the value of industry-specific knowledge and resources and drives industry to take responsibility to lead their own safety initiatives/efforts. One stakeholder commented that industry-specific resources also help employers to interpret safety legislation and implement compliant and safe practices in their workplaces. Another stakeholder noted that workers are also more likely to buy-in to safety practices when they can see how their own job is impacted through use of industry specific examples. Industry specificity helps to bring the concepts down from theory to a practical level.

Several stakeholders noted that IBSPs are perceived as a 'safe place' for employers to seek help and have open dialogue about safety that is not associated with the regulator/government. The direct connection to familiar host organizations is also seen as key to member engagement in the safety programs.

Most stakeholders agreed there is an important role for SWMB in enabling IBSPs. This includes providing assistance and support for new programs to grow and mature, and working with established IBSPs to address gaps or develop tools that may benefit multiple programs/industries. New IBSPs agreed it was helpful to have SWMB as a partner to guide them through the development phase, provide a governance model, assistance with initial branding, connections and networking opportunities with other IBSPs.

New and established IBSPs share information and materials with each other and develop solutions that build off each others' expertise and experience. One stakeholder suggested SWMB should consider reimbursing an IBSP that develops tools or resources that can be used by others.

There is more work to be done

There are still some key industries that are not served by an IBSP, including healthcare. The MFL hopes to see more diversity in the industries engaged with IBSPs and their membership, noting the current IBSPs are all in male-dominated industries. Another stakeholder noted that the work SWMB had done to bring together senior management and staff from specialized homes was valuable.

One stakeholder indicated small businesses reported receiving letters from SWMB encouraging the employer to support the IBSP. This causes the business to feel pressured by SWMB when there is little perceived benefit. This is believed to be an inappropriate tactic to achieve the objective of an IBSP versus the objective of improving safety.

There is concern regarding the funding model for IBSPs

New and established IBSPs acknowledge that the funding model does not generate enough revenue to sustain their organizations, and this has created pressure to find external revenues to balance their budgets. Existing IBSPs expressed concern that this causes behaviour oriented to generating revenue versus focusing on addressing prevention needs and can undermine each other. New IBSPs are working to draw in companies/rate codes to keep sufficient revenue and/or seeking opportunities to deliver training outside their membership. Some new IBSPs reported this business development and administrative activity consumes valuable time and resources that would be better spent serving their members. Several stakeholders suggest that SWMB may need to subsidize new IBSPs until they can achieve stabilizing revenue.

Several stakeholders expressed concerns regarding the sustainability of the current funding model. For both new and longstanding IBSPs, funding is generated through a percentage levy on employer WCB premiums. As overall injury rates have improved, WCB premiums have been reduced. This means the IBSP must increase the levy percentage to generate the same amount of funds. This situation is compounded for industries with lower risk and thus lower WCB premiums, as the percentage of the levy they must collect from employers to provide supports is higher than that for higher-risk, higher-premium industries. As the prevention rebate percentage has not changed, the net difference between the IBSP levy and the prevention rebate is shrinking. One

stakeholder noted that the need to increase the levy percentage may also lead members to believe the IBSP is mismanaging their program.

A few stakeholders also noted concern that industries that pay the IBSP levy are subsidizing those that do not, as WCB premium reductions were applied to all industries, not just those with an IBSP. Stakeholders feel that some of the savings should have been reserved to subsidize the cost of IBSPs.

Most stakeholders observed that there appears to be significant funds from general premiums going toward development of SWMB, including a large staff and expansive offices. In the meantime, industry-based programs, especially new ones, face significant budget challenges.

Employer alignment with IBSPs

Employers are assigned to IBSP programs according to rate codes determined by SWMB and the IBSP to be the best fit based on work activity. In some cases, more than one IBSP may consider themselves the best fit.   To participate in the prevention rebate, the employer must receive safety certification through the assigned IBSP. Given the range of activities or nature of business of some companies within a given rate code, they may not feel the assigned IBSP has the best natural alignment of business activity or workplace risks, particularly where there was a previous satisfactory relationship with another IBSP. Both new and existing IBSPs noted this has an impact on the employer, in that the assigned IBSP may not have the expertise relevant to their actual work environment and can have a de-stabilizing effect on the association to which the employer previously belonged.

Stakeholders who commented on this topic felt that while a rate code generally may be aligned, there should be flexibility for an employer to be differently aligned based on their specific work activity and associated risk. Further, insisting that an entire rate code must provide support for an IBSP before they are 'in' (eligible for certification and prevention rebate) can prevent progress.

SWMB indicates it has not 'assigned' rate codes to IBSP programs. SWMB prepared a proposal and asked the IBSPs if there was agreement in the proposed alignments. All but one IBSP responded with their agreement with the proposal for their IBSP. Several IBSPs requested that additional rate codes be aligned with their programs. In order to be aligned, the IBSP or the employers in a rate code must demonstrate that alignment is based on the workplace hazards faced by workers in these workplaces. Ultimately it is the employers in each rate code who decide if they support paying fees or levies to specific IBSPs. (A set of rate codes is only assigned to an IBSP when employers representing at least 50% of payroll in that set agree – MNP*).   SWMB also notes there is a relatively small number of employers who are COR certified but pay a levy to another IBSP (about 100) for whom alignment may be a concern.*

SWMB is overly intrusive with IBSPs

Complaints of micromanagement and intrusive oversight arose from both established and new IBSPs. These stakeholders cautioned that SWMB should take care not to direct the management of industry programs. IBSPs should be industry driven, not SWMB driven. There is a significant concern that SWMB is dictating what the IBSPs should be doing that goes beyond reasonable parameters for responsible oversight.

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Some stakeholders felt reporting requirements have become overly burdensome. This requires an investment of limited management time, and often results in repeated information in reports.

Reliable communication is important

Half of the IBSPs reported often receiving different answers to questions depending on who is asked (WCB, SWMB senior management, Portfolio Leader, etc.). This creates frustration, delays, and undermines confidence and trust in the partnership. There is also a need for better communication regarding progress on initiatives and issues.

SWMB role in promoting IBSPs

All IBSPs raised concerns that SWMB promotion activity puts SWMB forward as the primary source of prevention support. IBSPs are a small mention on the SWMB website and are absent from SWMB advertising. All IBSPs believe at least some of SWMB advertising should be industry-focused, profiling their organizations and developed in collaboration with the IBSPs.

Some stakeholders specifically stated that as a partner, SWMB would be expected to promote the IBSPs to new registrants with WCB, provide contact information, and enable a connection. Stakeholders would also like WS&H to refer employer inquiries directly to the relevant IBSP.

3.4   SAFE WORK CERTIFIED/PREVENTION REBATE

Questions:

Please comment on your knowledge or experience with SAFE Work Certified.

- Has the certification process been established/customized for your industry sector?
- Has this program had an impact on adoption of meaningful safety prevention for your sector, for all sizes of business? What has the uptake been for employers in your sector?
- Any comments on program administration/suggestions for improvement?

The Prevention Rebate is available to Safe Work Certified employers.

- Please comment on your knowledge or experience with the Prevention Rebate.
- Do you feel that the prevention incentive has encouraged investment in safe work? How has the rebate program been received by employers?

Stakeholders reported that the SAFE Work Certified program has been customized for five of the seven IBSPs. Given the difference in business activity, certification for self-insureds may be different for each employer, potentially in collaboration with another IBSP if there is natural alignment. Customization for agriculture is in progress.

One stakeholder felt the SAFE Work Certified Program was one of SWMB's most significant accomplishments, creating a minimum standard of what a safe work culture should look like. While most other stakeholders were supportive of the intent, there are concerns with some of the details and administration of the program.

Medium and large employers pursuing certification

A small number of medium to large employers in most of the new sectors covered by an IBSP have achieved certification, with more expected in 2018 and over the next couple of years. All new IBSPs indicated that they expect only a few of their larger members are ready or have the resources to pursue certification in the next few years. All sectors reported that the incremental cost of certification for large businesses that already have sound safety practices is reasonable, however, for small business, the amount of work involved is proving to be overwhelming.

Construction IBSPs indicated employers of all sizes in the construction sector continue to pursue COR and SECOR (small employer COR). While the prevention incentive is reported to be nice, it does not seem to be the significant driving factor.

Two stakeholders expressed interest in considering how there could be a financial incentive or reward for self-insured employers to become certified. One example offered was a reduction in the percentage of administrative expenses applied to their direct costs.

At least half of stakeholders expressed concerns with the emphasis on achieving certification as an objective, as opposed to building safety systems, with certification as the result, for some. If certification is only realistic for businesses that have strong programs in place already, how is this meaningfully advancing safety? These stakeholders feel that prevention emphasis, energy, and objectives should be focused on making a difference in areas of greatest need – those employers that have little in place, and for whom certification is not a realistic goal. Some stakeholders believe it is likely small business will not invest in certification until it becomes a business imperative, for instance, if necessary for bidding. Many stakeholders feel recognition in some form is warranted for small businesses that have created a safe working environment, even if not sufficient for certification.   There is a concern that the focus on certification seems to ignore these small employers who have taken incremental steps to improve their practices.

SWMB explained that establishing consistent practices across an industry will start with the industry leaders - large organizations with established safety programs. They will be the early adopters who will set the example and establish the norm for others in the industry to follow over the next five to ten years. To focus only on the initial entrants to the certification program is short sighted. The construction sector presents a good example of the success of this long-term strategy.

SWMB also indicated that focusing on achieving certification is not the objective. Rather, having an established template for good industry practices will help every workplace to become incrementally safer, regardless of their safety maturity or whether they choose to pursue certification.

Prevention rebates have some, though limited value as an incentive

While mostly supportive, there were some mixed opinions on use of the prevention rebate as an incentive. Some stakeholders were strongly supportive, indicating that while safety will eventually be recognized as the right thing to do, encouragement through financial reward is a practical approach. A few stakeholders, including the MFL, expressed a clear preference for rebates based on safety programs in place versus claims experience, to avoid claims suppression. A few stakeholders specifically made statements in support of the policy which makes employers ineligible for the prevention rebate if they have received an administrative penalty from WS&H.

One stakeholder questioned the validity of an 'advance' payment (prevention rebate) before the employer's safety program is proven effective in reducing injuries (decrease in claims).

Most stakeholders reported that the prevention incentive is not the primary driving factor behind certification, but it is a factor in the overall return on investment for safety. The incentive does have limitations; with lower WCB rates, the levy percentage must rise to generate the same funds for an IBSP, and the margin between the levy and prevention rebate shrinks.

Stakeholders agreed that for employers that do not already have most systems in place, the prevention rebate is only a small fraction of the combined cost of the IBSP levy and the investment necessary to achieve the standard, and it is not a meaningful incentive. One stakeholder suggested providing a financial incentive to small employers based on engagement with the IBSP, with the objective of exposing them to the safety program and its services, ultimately increasing the likelihood that they will engage in prevention practices.

There needs to be greater recognition of equivalency/reciprocity

All the IBSPs discussed concerns regarding equivalency/reciprocity of safety certifications. An employer who takes training and goes through certification with an IBSP that is not assigned to their rate code is not eligible to receive the prevention rebate. Nor is an employer whose rate code is not included in any of the IBSPs. The example was provided of consulting engineers and architects, many of which are COR certified, being not eligible for the prevention rebate. Stakeholders also reported that companies certified in other proven management systems, such as the ISO safety standard are not eligible without taking additional steps. Stakeholders in sectors with proven, third-party evaluated audit instruments are frustrated that SWMB does not accept audits completed using these instruments. Two of these stakeholders also feel that the SWMB tool adds requirements that are not relevant to discharge of a safety program, and in other areas the SWMB audit requirements are less robust.

The IBSPs have worked together to establish or understand the extent of possible reciprocity of their respective certifications. Some differences remain, for example where there are industry-specific hazards that another IBSP may not audit. COR certification in construction is a distinct national standard with specific audit requirements and does not recognize SAFEWork Certification as equivalent (although COR certification is now considered to also meet the SAFE Work certified standard for the construction industry).

SWMB clarified that an employer may be a member of a different industry-based safety program than its assigned rate code. All that is required is for the aligned IBSP to recognize the audit conducted by the preferred association and grant the aligned certification. Challenges arise when the IBSPs are unable to agree to do so.

SWMB has further indicated that only in a minority of instances will an employer not be eligible for the rebate if they achieve certification. For example, if a personal care home or a restaurant achieved certification there would not be a recourse for rebate eligibility. There currently aren't any employers in these areas seeking certification. Consulting engineers and architects are presently recognized by SWMB to receive the rebate if they become COR certified with one of the construction IBSPs. Discussions are underway with the construction IBSPs to accept this approach.

Challenges with SWMB audit administration

SWMB requires auditors to take the SWMB four-day safety auditor course to be qualified to conduct external SAFE Work Certified audits. A few stakeholders indicated there is a sense that the professional safety expertise in Manitoba that existed before SWMB is not being recognized or respected.

Most IBSPs also expressed frustration with the level of involvement of SWMB in every certification audit. One indicated SWMB actively questions auditors about how the categories have been completed.

SWMB indicated it only reviews audits of the new IBSPs in order to establish consistent practices amongst auditors and between industries. SWMB does not review the audits of the established programs, such as in construction where this consistency has already been established.

The MFL expressed concerns that there may be some bias or lack of adequate representation in certification audit results if the employees chosen to participate in the audit are selected by the employer or the auditor. The MFL would like to have the union(s) representing employees at a workplace select the workers involved in certification audit interviews, or at the very least, have workers chosen at random.

3.5 TRAINING

> **Questions**
>
> Are you familiar with the training and education services offered by SAFE Work Manitoba?
>
> - If yes, please tell us how?
> - Can you comment on what you feel is working well? Opportunities for improvement?

SWMB role should be more in development, less in delivery

Most stakeholders questioned SWMB's role in training, with frequent concerns that SWMB is duplicating training provided by IBSPs and others. There was an example given by multiple stakeholders of SWMB

delivering training in northern Manitoba at no cost. As IBSPs deliver the same training for a fee, SWMB is believed to be both wasting resources and undermining the IBSPs.

The MFL feels there has been effective collaboration between themselves and WCB/SWMB regarding training and other resources.

Most stakeholders felt that SWMB training and education should be focusing on gaps in training available through IBSPs or others in Manitoba, on employers that do not belong to an IBSP, or potentially the public, in collaboration with other organizations such as MPI (e.g. how to drive safely in work zones, around emergency responders, etc.). Otherwise, SWMB should be facilitating connections to existing providers. Many stakeholders also commented that development by SWMB of education and training programs with value across sectors, in cooperation with IBSPs, also makes sense (for delivery by the IBSPs). IBSPs would be pleased to work with SWMB to identify areas of need for course development. Any delivery by SWMB should only be to fill gaps in consultation with the IBSPs.

SWMB advised SWMB delivers safety workshops across the province at no cost (including northern Manitoba). The vast majority of participants are from industries that are not served by an IBSP. Participants from industries served by an IBSP are directed to obtain training from their IBSP.

Most stakeholders also commented that training *delivery* is an important area of activity and revenue for IBSPs. Self-insured employers agreed that SWMB should focus on gaps in training where employers do not have internal expertise, or where not available from other sources. They did note that these employers tend to be reluctant to engage unions for external safety training and would prefer delivery from SWMB as an alternative.

Developing training standards was noted by some stakeholders as a key role for SWMB. WS&H reported that they review courses to ensure they align with legislation. Specific examples provided by individual stakeholders where standards would be useful include training outlines/templates and specifying uniform pass rates, as currently there are differences among training providers. All reiterated that SWMB should then partner with the IBSPs for customization and delivery. One stakeholder commented that SWMB materials can be a good benchmark to ensure internal training is in line with standards. MFL noted concerns with incorrect information included in some training delivered by external sources.

As noted earlier, all stakeholders feel it is important SWMB solicit input from stakeholders and truly listen to expressed needs, including needs for training. One stakeholder provided an example of a need they had discussed with SWMB for skills-based, advanced auditor training (e.g. interviewing, observation). SWMB developed a course, however, in this stakeholder's opinion, it only focuses on how to use the SAFE Work Certified tools. The course could have been made more valuable with input from IBSPs and the gap remains. This training was identified by another IBSP as an example of a course that could provide valuable revenue if delivered by the IBSPs.

3.6   TARGETED STRATEGIES

Questions

Other key action areas in the plan included

- Focus on Manitoba's most vulnerable workers
- Improved supports for small business
- Addressing workplace mental health

How effective has SAFE Work been in these areas?

Vulnerable workers

A small number of stakeholders were uncertain about what exactly a vulnerable worker is, and two stakeholders expressed concern about this choice of term.

Generally, stakeholders are supportive of SWMB efforts to have materials available in other languages. One stakeholder suggested that these could be further improved with visual elements, as has been done in one industry subsector. Another stakeholder noted further support could include translation services for training courses.

Most stakeholders were also supportive of SWMB and Safe Workers of Tomorrow efforts to make sure youth and their parents have an awareness of safety. Two stakeholders specifically commented positively on the television advertisements directed at young workers and their families, and the initiative that brings young workers in for an interview.

Two stakeholders suggested that the success of special initiatives could be increased through integration with other systems and programs, for example schools, Welcome Centres, Immigration Centres, Better Business Bureau, medical community, and Entrepreneurship Manitoba.

Supports for Small Business

Many stakeholders felt there has been a lot of effort put into improving supports for small business, however, all commented that there is still work to be done to build awareness, and programs and tools appropriate for small (20 employees or less) and very small (5 employees or less) businesses. There was consensus among stakeholders that safety needs to be simple and attainable for small businesses, and most likely requires one-on-one support. Written materials, templates and forms can be overwhelming and burdensome for these employers.

Even though SWMB has a small employer path intended for workplaces with less than 20 employees, as noted previously in this report, many small businesses are not ready for certification, especially businesses with five workers or less. One stakeholder noted that the SECOR certification for small business is a good model. There has been some work in a new sector to develop a certification path for independent operators, but this is still in

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development. One stakeholder suggested that different levels of certification (i.e. gold, bronze, silver) as implemented in some other provinces might have potential. One stakeholder noted concern that if certification becomes mandatory for any government purchasing, small businesses may be unable to compete. A bid price incentive for certified companies may be more effective.

Many IBSPs reported their supports for small business are focused on one-on-one consulting to complete a gap assessment, identify incremental improvements and associated training. Most of these employers will require hands-on help to build a safety program.

A non-IBSP stakeholder noted SWMB and IBSP activity as positive, and further suggested it may help to provide services outside of regular business hours when small business owners have time to deal with matters other than day to day.

Workplace Mental Health

Most stakeholders are aware of the National Standard for Psychological Health and Safety in the Workplace and its 13 elements but had less knowledge of related SWMB initiatives or supports. Those familiar indicated that the SWMB strategy essentially reflects supportive approaches for good organizational culture. One expressed concern with SWMB attention to topics that extend beyond prevention of compensable conditions, particularly when other gaps remain. The Five-Year Plan promised "new supports…for front-line personnel who routinely face traumatic events." This remains an area of need.

One IBSP reported that they began offering Mental Health First Aid training, which helps supervisors recognize signs of mental distress. Another IBSP has partnered with Klinic to provide mental health services for workers in the sector. There was a general belief expressed that SWMB and safety professionals are not experts on mental health issues and there is a need to involve the medical community and human resource experts.

There are differing opinions regarding the role of regulation with respect to mental health. Some stakeholders, including the MFL, feel it should be part of the regulatory structure to encourage compliance with safeguards. Others feel mental health is not something that can be legislated beyond measures related to workplace violence and harassment.

SWMB advised that two individuals at SWMB have extensive experience and credentials related to mental health in the workplace. On the topic of mental health, SWMB has consulted extensively and established strong partnerships with the mental health medical community, mental health service providers, social agencies and HR professionals, including Klinic and St. John's Ambulance, who provide Mental Health First Aid.

3.7 ACCESS TO DATA AND INFORMATION

> **Questions:**
>
> Have you worked with WCB to obtain information and data?
>
> - What information do you find useful? How do you use this information?
> - Is there other information that would be useful for you?

The IBSPs and WS&H have access to a data portal that includes WCB injury and illness statistics at the industry, rate code and employer level. Other stakeholders can request information and data through the SAFE Work Portfolio Leaders. Data is available to non-IBSPs at the industry level, including injuries (time-loss and no-time-loss) and claims costs. - MNP

Stakeholders with access to the data portal are generally pleased with its functionality. The ability to export data and potential integration with CRM and HR systems were noted as beneficial features of the system. More understanding of what is available would be valuable. One stakeholder gave an example of an instance where SWMB staff were not aware of what is available in the portal, causing some unnecessary additional information requests to other parts of the WCB.

Stakeholders without portal access reported that SWMB/WCB has been responsive to requests for information.

Stakeholders use the information for various functions, including:

- Presentations to industry groups and individual employers to build awareness
- Targeting prevention strategies and campaigns
- Targeting specific companies (within IBSP rate-code) for outreach
- Statistics for corporate dashboard
- Collecting information on trends

The following additional information would be valuable:

- Causal factors to enable focus for preventative measures (what led up to the injury)
- Company information reported by number of employees, in addition to payroll

Some IBSPs expressed a need for non-participant employer information and statistics so that they can target recruitment efforts, estimate revenues from additional rate codes and offer safety services to employers that need them most. This information is not currently provided by SWMB, even for non-participating sub-sectors of established IBSPs. IBSPs see this as a disconnect; SWMB can access employer statistics, however, cannot share this information with the safety associations that they have commissioned to service the employers.

SWMB advises it is restricted from sharing financial information at the employer level by FIPPA.

3.8   SAFE WORK MANITOBA GENERAL SERVICES AND SUPPORTS

Questions:

Are you familiar with SAFE Work Manitoba's general services/supports?

- Information, resources, tools
- Public awareness campaigns
- SAFE Work Store

How would you describe the effectiveness of these services/supports in enabling prevention activities and creating a safety culture in Manitoba workplaces?

Information, resources, tools

Stakeholders acknowledged the extensive brochures and print materials available from SWMB. Half of stakeholders expressed a need to make this information available using modern technologies (apps, mobile tools). SWMB's use of social media platforms for engaging with young workers and entrepreneurs was noted by one stakeholder as positive. Another stakeholder noted that SWMB videos are an effective tool for training, used by stakeholders that do not have their own resources. The videos provide practical 'shop-floor' level of detail.

New and existing IBSPs pointed to opportunities to leverage technology solutions from other provinces and organizations, for example BC and Canadian Centre for Occupational Health and Safety (CCOHS) apps. In their opinion, SWMB has been seen to ignore some of these in favour of doing its own development.

SWMB advised it has established a long-term contract exceeding $100,000 annually using CCOHS's e-learning courses instead of developing these internally. In addition, SWMB has 'borrowed' campaign material and resources from other provinces. In 2016, SWMB used BC's campaign material to launch an asbestos campaign in Manitoba.

A few stakeholders noted that while web-site language is clear and concise, there are opportunities to improve the SWMB website, including the search function. One stakeholder suggested a clear set of standards and brief overview should start each section, then provide a click through to other resources, instead of a lengthy list of tools and checklists as the first result in an area of interest, e.g. Supervisors.

Two stakeholders identified a continued need for occupational hygiene risk assessments available from SWMB. There are some concerns with SWMB responsiveness to requests for support, and one stakeholder would like clarity on what types of services are available from SWMB.

Public awareness campaigns

The MFL indicated their belief that public awareness efforts are having an impact by changing mindsets.

Most industry stakeholders perceive a significant investment is being made in generic promotions and wonder if this is having a measurable impact.

IBSPs questioned the emphasis on development of the SAFE Work brand to the exclusion of IBSPs, when the IBSPs are intended to be the delivery agent for prevention services. IBSPs feel that advertising campaigns should increase awareness of the IBSPs as resources, not just SWMB. SWMB is and should be represented as part of a broader community that believes in safe work and safe work places. IBSPs would like more of a balance between public awareness and support for industry specific campaigns that help raise awareness of specific hazards. Some IBSPs feel this valuable activity is beyond the financial capacity of IBSPs to do on their own. Others indicated willingness to cost-share if the campaigns had value.

IBSPs felt that with collaboration, they could also help improve public awareness campaigns. Concerns were identified regarding the content of certain campaigns including fragmented messaging and errors, such as who to notify if injured. *(MNP note: referenced campaigns include those by both SWMB and WCB)*

Several industry stakeholders expressed a concern that SWMB advertising tends to vilify the employer instead of recognizing the employer as part of the solution. One felt that the emphasis on employer responsibility over many years has accomplished as much as it can, and more could be gained from workers understanding more about their own responsibilities. While not speaking specifically about advertising, the MFL expressed concern that there is generally a "blame the worker" culture in Manitoba workplaces. They feel using terms like 'work safely' inappropriately put the onus on the worker.

SAFE Work Store

Stakeholder comments regarding the online store were similar to those related to concerns regarding investments in SAFE Work branding – essentially, concerns that the focus is on building up SWMB versus increasing awareness of all safety resources and supports. Co-branding may have some value to promote the partnerships with industry. IBSPs and many others sell safety supplies and SWMB could provide links to those sites. If anything, the emphasis on the SAFE Work brand, and the store, seems like competition.

3.9   MEASURING SUCCESS

> **Questions:**
>
> How would you define success for SAFE Work Manitoba? What are the right measures to understand prevention of work-related injuries and illness in Manitoba? What targets should we be aiming for?
>
> Current indicators:
>
> - % workforce covered by an IBSP
> - % employers that are SAFE Work certified
> - # of SAFE Work Manitoba courses taken, satisfaction with courses
> - Media and social media exposure, website traffic, etc.

Many stakeholders identified an interest in understanding the return on investment so far, including the baseline, and indicators of progress on the Five-Year Plan and SWMB. There is felt to be an absence of this information. Ultimately the goal would be that the savings arising from investments in prevention would justify the cost.

The majority of stakeholders felt "the workforce that has access to an IBSP" is a worthwhile measure, if the focus of the IBSP is on helping address their needs. If the measure of IBSP success is focused on the number of employers certified, the emphasis is misplaced, as discussed earlier.

A few stakeholders also commented that measuring the number of participants in SWMB courses and satisfaction is helpful internally to SWMB, but to represent progress for the province, it should capture the participants and/or hours of training occurring across the province through IBSPs, and potentially others.

Many stakeholders agreed that lagging indicators (e.g. injury rate) are the best indicators of outcomes. Some stakeholders cautioned that leading indicators assume that the programs and resources being measured are effective. There needs to be an understanding of the relationship to outcomes before assuming supporting activities are indicators of success. Where possible, identifying a set of measures commonly used across provinces would also be beneficial (both to learn from others about effective measures and to allow comparison).

In terms of specific indicators, stakeholders suggested a combination of leading and lagging indicators as follows:

Workplace participation in prevention

- Number of companies engaged in IBSP activities
- Number, % of workplaces actively involved in prevention
- Number, % of workplaces that have effective safety programs
- Extent to which safety programs are a part of doing business
- Engagement of workplaces that include women, young workers, newcomers
- Referrals to IBSPs (through calls, media, social media)
- Investments in training (hours per person)
- Companies accessing safety courses for the first time
- Number of mentoring programs

Compliance/quality of programs

- Compliance with regulatory requirements
- Trends in certification audit scores (total score and separate elements, e.g. site inspections, hazard assessments, near-misses, tool-box talks, etc.)
- Number of companies COR Certified (recognition of COR alongside SAFE Work Certified)

Reduction in injuries, costs

- Trends in injury rates, severity, duration, cost, number of incidents
    - In relation to size of workforce
    - Continuous reduction as opposed to specific target
- Correlation of IBSP, SAFE Work Certified, injury rates, claims
- Savings realized by safe companies (reductions in sick time, overtime, re-training, etc.)

Engagement and culture

- Engagement with C-Suite
- Understanding of SAFE concepts
- Measurement of culture
    - How to best measure/report on culture, and the validity of current tools and approach remains a concern
- Visible thought leadership and committee involvement
- SWMB promotion of IBSPs

Satisfaction

- Company satisfaction with IBSP
- IBSP/stakeholder satisfaction with SWMB supports

3.10   ACHIEVING FURTHER PROGRESS

Questions:

- What do you believe are the top priorities to achieving a culture of safety in Manitoba workplaces?
- What is limiting progress? Are there specific barriers to achieving this vision? What is needed to address these barriers?

Priorities

Stakeholders discussed a variety of priorities for prevention; the two most common being engaging company executives and focusing on areas of unmet need.

Engage the C-Suite – A lot of communication regarding the safety value proposition goes to the mid-level safety specialists in an organization. There is a need to make sure senior executives are getting the message and support it. These senior executives lead the company, make the decisions where to invest, and are in a unique position to draw the connections between safety, morale, and profitability. A key factor could be to have company performance on safety measures as part of executive performance and compensation. Middle management tools and resources are also an area that is lacking.

Focus on the areas of most need – This includes the employers not yet aligned with an IBSP, employers with little currently in place to support safety, small business, and industries that may currently be struggling. All stakeholders identified a need for practical easy-to-use tools and supports to help these workplaces move forward. At least half of stakeholders specifically identified that this needs to happen for these employers long before a drive to certification. These incremental steps forward will reinforce positive behaviour.

Promote benefits of safety and worker involvement, for all sizes of workplace – IBSPs and other stakeholders feel this needs to include examples of what a safe workplace "looks like", at all sizes, the benefits/business case for safety, the employers' responsibilities, and workers' rights and responsibilities. For many stakeholders, this also includes attainable, practical expectations for safety culture. One stakeholder suggested that encouraging people to think about safety '24-7' will also make it more natural in the workplace.

Educate young workers, new Canadians – There was general agreement these are the demographics most at risk and who need education as future managers.

Make safety mandatory – Encouraging expectations for safety from suppliers will have a marked impact. When purchasers demand something, business will deliver. There are some concerns that mandatory bidding requirements may create insurmountable barriers for smaller businesses. Paying higher contract rates to companies that are certified may be an effective incentive for investment in safety. It is also important to keep in mind that SAFE Work Certified is not the only demonstration of safety (see recognition/reciprocity of other safety certifications).

Barriers to Achieving Desired Outcomes

Culture – Several factors related to the existing culture and beliefs in Manitoba workplaces were identified by individual stakeholders as barriers:

- The perceived value of safety varies among employers. There is a need to find out what is important for each to get buy-in
- Lack of peer-level resources for engagement with senior executives, to have sufficient influence/respect
- A high proportion of workplaces/workforce believe that workplace injuries are inevitable
- "Blame the worker" culture – the term "work safely" implies that onus is on employee
- "Blame the employer" culture – workers may not realize they too have personal responsibilities

Small business capacity – Most stakeholders commented that developing safety programs can be overwhelming for small employers, and the prevention rebate is not sufficient to meaningfully offset the costs.

Engaging employers that are not currently connected to an IBSP – IBSPs commented that they have difficulty reaching past their base of members to offer services with the limited resources available for outreach.

Regulatory considerations – Two stakeholders reported that safety regulations can be difficult to understand and contribute to the perception that safety is difficult. A small number of stakeholders had concerns that enforcement does not have enough "teeth", and employers may view paying penalties as less expensive than

putting proper processes in place. Many commented that there is still a perception that SWMB is a regulator (or intimately connected to the regulator) and this leads to reluctance to ask for assistance.

3.11 OTHER CONSIDERATIONS FOR THE NEXT FIVE-YEAR PLAN

Prevention Committee composition – Several stakeholders commented on the composition of the Prevention Committee. IBSPs are concerned that there are not enough representatives from the health and safety community, creating a knowledge gap on the committee. IBSPs have also expressed interest in "having a seat at the table". Some stakeholders feel that the level of representation from the provincial government creates the potential for interference with SWMB's mandate. Several stakeholders also feel it is important that the Prevention Committee has a meaningful role in ensuring SWMB programs and investments are effectively focused on priorities and delivering a return on investment.

Inclusion of return-to-work in IBSP mandate – Several stakeholders argued that return-to-work is an important part of reducing the impact of injuries, including preventing mental health issues that may develop following a physical injury. Employers need access to best practices in return-to-work, and assistance in program design, and these services are a natural extension of an IBSP's mandate.

More representation of workers and unions on safety councils – The MFL suggested that there should be more union and worker representation on IBSP safety councils.

4   KEY THEMES FOR CONSIDERATION IN NEXT PLAN

Key summary themes arising from the stakeholder engagement for consideration in the next plan are identified below. *All statements in this section reflect the opinions and perspectives offered by stakeholders engaged in this process, and not independent analysis by MNP.*

1. **Role of SWMB** – Clarify the role of SWMB, particularly in relation to development of standards/programs versus delivery of services, and in the context of the relationship with and roles of industry partners. Consider the intent and approach for monitoring IBSP activity, the role of SWMB in the certification process, and the role of SWMB in generating awareness of industry resources.

    Stakeholders are also becoming frustrated with requests for input that appear to have little impact and would like some accountability for whether and how input such would be used.

2. **Funding Model for IBSPs** – Under the current funding model (percentage levy), improvements in safety mean the levy percentage will need to continually increase. Inadequate funding is causing IBSPs to target activity that generates revenue. Developing a base of user paid services takes time, and may take resources away from basic service delivery to primary members. The urgency for revenue can also cause competition instead of encouraging cooperation among IBSPs for the benefit of the employer and best prevention outcome.

3. **Continue focus on gaps that remain from the previous plan** – Stakeholders identified several key elements of the last plan that warrant continued focus, including small business, young workers, training

standards, the PTSD aspect of mental health, executive-level focus and mentorship, and continued work to develop industry-based prevention.

4. **Promote accountability and transparency** – Stakeholders are keen to understand what progress is being made. A clear set of performance measures within the strategy will help make clear the expected return on investments in prevention and can be used to monitor and publicly report annual progress on identified goals. Including the activities of IBSPs in annual reporting will help to provide a broader picture of what is being accomplished.

5   MNP INDEPENDENT INQUIRY AND RECOMMENDATIONS

MNP reviewed the stakeholder concerns with WCB and SWMB senior management and gathered insight from the organization on the identified issues. The following represents MNP's independent analysis and recommendations on the major themes identified by stakeholders.

5.1   FUNDING FOR IBSPS

IBSP's expressed concern that the level of funding, particularly for new IBSPs, creates challenges in achieving the desired impact and results in competitive versus cooperative behaviours.

The WCB confirmed it recognizes the challenges with levy funding as a key issue in ensuring an overall sustainable approach to fund IBSPs.   Funding for IBSPs is currently under review.

Funding IBSPs through an industry levy is consistent with the concept of 'industry funded, industry led' programming. The reward for success, in terms of lower WCB claims costs and thus premiums, however, is the levy becomes a continually higher percentage of the WCB premium.

Recommendation 1: As a partial, quick fix solution**,** the WCB could change shift how it illustrates the levy on employer statements, for example to express it as a dollar amount per $100 payroll versus a percentage of the WCB premium.   In such a manner, employers can compare any changes in the investment they are making per year outside of the context of the WCB premium.

Recommendation 2: Consider supplementing levy funding with funds from general assessment revenue to support investments in awareness / marketing or development of curriculum, tools or content, particularly where it could have broader use. A condition of the additional funding may be that the resulting work be shared, and not duplicate existing resources.

5.2   SAFE WORK CERTIFIED

Stakeholders expressed concern that focusing on certification as a goal is most relevant for employers with already well-developed safety programs, instead of where there is the largest gap or need. SWMB explained that the intent was to enable visible safety leadership with larger employers who could be early adopters and establish the norm for other employers to follow over the next five to ten years.   These employers have also identified additional opportunities to strengthen their programs through the process to achieve certification. As large employers, they represent a larger proportion of the workforce and improvements in safety thus have a greater overall effect.   In many cases, the value proposition for an industry-based safety program for these employers, and thus their support for a levy, also meant access to savings through the incentive program, necessitating certification.   SWMB also indicated focusing on achieving certification is not the objective. Rather having an established template for good industry practices will help every workplace become incrementally safer, regardless of their safety maturity or whether they choose to pursue certification.

MNP's review indicates the "SAFE WORK CERTIFIED" brand and information on the website currently focuses almost exclusively on certification, including the rebate. The posted video is titled 'become safe work certified", and the roadmap shows the path to certification (audit steps), with one box labelled "implement and assess your safety management system". The web pages indicate "SAFE Work Certified is built around the safety essentials of leadership commitment, hazard identification and risk control, and worker participation", but does not provide information on what each of these involve. While related information exists throughout the site and can be found with various searches, it is not packaged in a way that a user could easily connect it to the standard, understand it in the context of a whole program, or where to start. There is a 2010 Safety and Health Program Guide on the web-site, but it is not linked to the certification page, and requires several clicks or a specific search to find it. The document is a text guide that must be downloaded, is not obviously aligned with the certification program (no section on leadership) and has little information on the landing page to attract further reading.

A key value of the certification program is the standard it sets. It establishes what is considered necessary for an effective safety program and orientation in an organization. With the current visible emphasis on certification as the goal, this value is under-realized. For many employers, certification may be unreachable, and they may disengage before progressing further.

Recommendation 3: MNP recommends packaging communication and supporting materials to emphasize the program as a *standard* for effective safety programs (vs the entire focus being on the audit and certification process) to help employer understand the elements, what that looks like, where to start, etc. to broaden the use and value of the program.

3a) User friendly visuals with clickable images to find more information on each element of the standard would be valuable to employers searching for easy access guidance. The SAFE Work Certified landing page refers to

the IBSPs as certifying partners and while accurate, this underplays the broader role of the IBSP in program development support which may have more relevance to employers not ready for certification.

5.3   ROLE OF SAFE WORK IN SERVICE DELIVERY

Stakeholders expressed concern that SAFE Work is duplicating services that could be offered by IBSPs and is investing significantly in the SWMB brand to the exclusion of IBSPs 'who are supposed to be' the service providers. Services identified as duplication include training and safety consultants working directly with companies. Further concern was expressed that these services are offered for free, when IBSPs need to charge a fee as part of an overall sustainable business model. These services are also seen to absorb resources when there remains a need for standard.

The original design concept for SAFE Work identified a strategic relationship and respective roles of SWMB with industry and market providers as partners in injury prevention, with SWMB establishing standards, and where necessary content development, and IBSP's and market providers as service delivery providers.   Training previously offered by WSH such as health and safety committee training would be continued by SWMB.

The SWMB Training Approach document from November 2016 indicates a role for both SWMB and IBSPs (and others) in delivery of training. While stating industry / job specific training is best provided within an industry and/or by specialized safety training providers, it indicates SWMB has an ongoing role to develop/deliver training where there is a provincial gap in training or at certain unique times such as legislative changes or responding to emerging hazards/issues.   The Approach identifies a standards program and overall training strategy will be developed in 2017 and would continue to include a no-cost option for current SWMB courses based on needs and gaps. SWMB confirmed it is aware of concerns regarding its delivery of training and intends to address this in the strategy under development. Some employers who have requested training directly from SWMB have indicated they do not want to receive service from an IBSP or labour organization.

While there doesn't appear to be significant differences in intent, some of the details of how SWMB training is executed are causing concern.

Recommendation 4: MNP recommends SWMB focus on standards and minimize direct service delivery. As the legislated authority on prevention, SWMB has an important role in establishing or recognizing satisfactory standards (for programs, training, training providers, audits, auditors, etc.) to ensure accurate and consistent quality of safety programming. This is important and valuable to employers, who can then have confidence their investments in prevention are aligned with regulatory requirements and best practices.

4a) SWMB's role may also include development of content or curriculum that requires up-front investment and delayed payback which can be difficult for IBSPs. Such development should be conducted where a priority need has been identified in consultation with stakeholders or statistical data (as confirmed with stakeholders) and done in *collaboration* (see IAP2 description) with industry partners to ensure the end product provides the required value. The IBSP or market provider may customize content with examples and context specific to the industry sector, deliver the program or service and advise employers on its application.

4b) Where it is *confirmed* there is NO IBSP, labour or market alternative, or if there is an approach to be piloted or tested, it may be warranted for SWMB to directly deliver some programming as a temporary measure. As

with all of the above, effective communication with stakeholders is important to ensure a common understanding of needs and gaps, and to prevent duplication or perceived competition.   If the SWMB service is responding to an ongoing gap, it should be provided on a temporary basis as SWMB works with IBSPs/the market to develop capability. Services offered for free by SWMB should be clearly distinct from those offered by an IBSP as it otherwise creates perceived disparity with those who do pay, whether through a levy or direct fee for service. It also is a disincentive for organizations to agree to become part of a levy funded model.

5.4   RELATIONSHIP WITH IBSPS

IBSP's expressed frustration in their relationship with SAFE Work Manitoba in a few main areas -- a perceived intrusive level of oversight and direction, a sense that while SAFE Work often asks for input, it doesn't seem to be influenced by it, and the extensive promotion of SAFEWork with little profile for IBSPs.

5.4.1   IBSP Oversight

The WCB indicated its oversight is intended to fulfil its obligation to ensure funds the WCB collects from employers for prevention programming are used effectively for that purpose. Examples of historical concerns arising from a lack of accountability were provided.

WCB Policy 52.20 – *Funding Industry Based Safety Programs*, effective March 1, 2015, sets out the principles and criteria for providing levy-generated funding for IBSPs. The policy requires the IBSP to demonstrate a number of requirements indicating programs and funds are applied appropriately, and a governance structure that supports these requirements. The policy further requires an annual report on program activities, results, financial matters and other matters as may be requested.

Guidelines to policy 52.20 include that the IBSP meet the terms and conditions of a Funding Agreement, including audited annual financial statements, a plan and budget approved by the Association Board of Directors, a three year strategic plan and annual report on activities.   The Funding Agreement requires this information to be provided to the WCB annually and to be posted on the IBSPs website.

The Funding Agreement further requires reports quarterly or otherwise at the WCB's request that include a complete narrative describing in detail the operational activity of the IBSP over the past quarter, financial statements including disclosure of the top compensated staff positions and specific detailed expenses, observations on material variations in the IBSP, a program plan for the next quarter, a list of employers using the IBSP and the specific services utilized, and other details as the WCB may request.

SWMB has typically communicated with IBSP management for these requirements through the assigned Portfolio Leader.

The ultimate responsibility for ensuring the program is functioning as it should and using funds responsibly rests with the host organization Board of Directors. It is therefore reasonable that the WCB engage with the organization at this level for required oversight**.**

Recommendation 5a): MNP recommends the WCB continue to require an annual plan and budget to demonstrate the IBSPs intended application of funds, and reports demonstrating implementation or variance

from the plan and use of funds. Agreement on a concise and consistent set of performance indicators would further enable this reporting and the value of the information. Imagine Canada Standards for Non-Profit Governance[3] indicate the Board of Directors should review this type of information at least twice per year.   It would be reasonable for WCB to require the Board to provide evidence that it has done so.   More frequent confirmation or detail (quarterly) may be warranted if an organization is considered higher risk (e.g., less than two years operating history, evidence of poor financial management or results, indications of a poorly functioning safety council, incomplete reporting, etc.).   Formally submitting this information to the WCB and making it available to stakeholders annually is also reasonable and is consistent with the policy and guidelines and Imagine Canada standards.

5b) MNP recommends the funding agreement reporting requirements be limited to those in the policy. The detailed quarterly reporting requirements in the funding agreement go well beyond policy requirements and could reasonably be considered both intrusive and a significant administrative burden. It also essentially duplicates the accountability and oversight of the association Board of Directors, who are accountable for the program and the agreement with the WCB.

If the WCB has reason to believe the association is not directing funds appropriately, it may require the organization to provide reasonable evidence to prove it is, without the need for such extensive, detailed quarterly reporting requirements.

While the Portfolio Leader is a valuable resource to the IBSP and Safety Council, the individual should not be directing program management in any way.

Stakeholders also expressed frustration with different messages being received from different contacts within the WCB and SAFE Work Manitoba. The WCB commented that such questions can also come from multiple people within the same IBSP/host association. The WCB acknowledged there is opportunity to strengthen internal communication processes and systems to ensure questions are consistently directed to the right person for the right answer, and to ensure internal awareness of contacts and communication that has occurred with the entire IBSP/host association.

5.4.2   Stakeholder Engagement

As noted above, stakeholders expressed frustration with SWMB 'not listening' to the input they provide. The Certification program was often mentioned as an example.

The WCB confirmed its commitment to listening to stakeholders while recognizing it must balance its legislated responsibility to ultimately determine policy considered to be in the best interest of the overall system, balancing the needs of employers, labour and public.

The WCB indicated that opinions and preferences for approach to specific initiatives can vary between IBSPs. In some situations it is difficult to develop a broad system perspective and approach. This is especially true when

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[3] Imagine Canada Standards Program for Canada's Charities & Nonprofits, 2012.

introducing new programming amongst the long standing IBSPs versus the newer IBSPs, where one size may not fit all.

MNP reviewed the example of the engagement conducted for the Safety Certification program. An Advisory Committee of knowledgeable representatives from across industry sectors/IBSPs and labour organizations was established and supported by documented Terms of Reference including roles and responsibilities for each. The Terms of Reference indicated "*Input from the working committee will be incorporated into a draft certification program. Finalization of the certification program and all related decision-making is the responsibility of SAFE Work and its Project Steering Committee. The working group will endeavour to use a collaborative process and work to identify areas of consensus. Where consensus on recommendations is not achieved, SAFE Work Manitoba will incorporate recommendations to maximize the success of the program*".   Meeting notes were provided, and a summary of Stakeholder Feedback was produced to capture what was heard both from the Advisory Committee and in response to broader stakeholder outreach (bullet points of input by topic). MNP was unable to confirm later communication to discuss areas of consensus or difference among stakeholders, how stakeholder input was used in program decisions or rationale for decisions that were not consistent with stakeholder feedback.

Recommendation 6: MNP recommends the WCB consistently formalize its approach to stakeholder engagement so that it can have greater confidence in the input received and enable stakeholders to have greater confidence that they will be heard. This includes:

- A clear request for input, indicating who is being asked to respond, and the process. In the case of organizations with IBSPs, the request may need to recognize the Safety Council and the host association (senior management and/or the Board of Directors) may have different views and provide a process or explanation of how responses should be handled .

- Clearly communicate the WCB's intentions for the stakeholder engagement and corresponding commitment to participants. The IAP2 Spectrum for Public Engagement[4] (Appendix D) provides a useful guide for this purpose. For example, the organization's goals may range from "Inform" to "Collaborate", and the associated commitment on use of the information changes accordingly. Misunderstandings can occur if stakeholders believe they are being asked to collaborate, when the organization's intended commitment was more at the 'Inform' or 'Consult' level.

- Provide a summary of 'what we heard' back to stakeholders so that they may see their input was heard. This should include some analysis – key themes or indications of where there is consensus and where there may be conflicting perspectives the WCB will need to recognize.   Where warranted (extensive time investment by stakeholders, significant policy or program decisions, etc.) *explicitly ask for confirmation* that the views have been thoroughly and correctly represented, and update the summary as needed.

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[4] International Association for Public Participation

- Provide information on how stakeholder input influenced the ultimate decision, and the rationale for decisions that diverge from stakeholder advice.

From MNP's review, SWMB defined the engagement process reasonably well and fed back the input to participants. The main opportunity appears to lie in the first and last two steps identified above.

5.4.3   Promotion of SAFE Work vs IBSPs

Similar to the concern of SAFEWork essentially competing with IBSPs for service delivery, stakeholders indicated the extensive investment in SAFEWork visibility overshadows the IBSPs, who are unable to invest in the same way.   As partners in injury prevention, IBSPs feel SAFEWork should be more actively promoting the role of and services available from IBSPs, or industry specific messages (eg seasonally relevant hazards).

MNP's review of the SAFEWork website indicates there is IBSP information present, but with a low profile, and not in all places it would be expected.

- The SAFEWork website "Industries' tab lists the names of the IBSPs, which link to a page with a brief text description, and a hypertext link to the IBSP website. The logos of the programs are not shown. Related resources are listed with a bold heading and large icons or the SAFE Work Brand 'button links' and are more eye catching than the IBSP short text description.

- The Education and Resource Tabs do not list or include direct links to the IBSPs. The Resource tab does have a link to a Service Provider Listing, which after multiple clicks provides access to a document within which some, but not all of the host associations can be found in the Table of Contents.

- The "I am an Employer" tab has FAQs for "*Who do I Contact for Help*", "*I am new to safety where can I get help*", and "*Where can I get help putting together my workplace safety program*". All provide contact information for SAFE Work Manitoba, with some including WCB and WSH. None of the answers mention the IBSPs (or Labour Organization contacts or market providers).

- The description of SAFEWORK Manitoba beside its logo says "Working with our partners in the safety community, we provide prevention education, safety programming, consulting and strategic direction to create a genuine culture of safety for all Manitobans".   The 'partners' aren't identified, and the overwhelming impression is that SAFEWork is the primary provider of these services.

SWMB advised that the public awareness campaign strategy as confirmed by the Prevention Committee is oriented around promoting safety culture. Industry specific risks or IBSP promotion would be considered the responsibility of the IBSP.   IBSP logos have been intentionally excluded from the website to avoid brand confusion.

Recommendation 7: Subject to the Board's consideration of the role of SAFE Work in service delivery as described in Section 5.3 above**,** MNP recommends SWMB review its overall promotion strategy with the included goal of increasing awareness of the services available through IBSPs (and others if appropriate). This strategy may include the additional funding identified in section 5.1 to enable IBSPs themselves to increase visibility of their program, or to promote industry or risk-specific messages.

7a) Increase the profile of IBSPs on the SAFE Work website so that it is easier for employers to easily find these resources. If it is a goal to promote IBSPs as service providers, the website is an important place to do so.

5.5   MEASURING SUCCESS - ACCOUNTABILITY & TRANSPARENCY

Stakeholders expressed concern for the seeming large investment in SAFE Work Manitoba, including staffing, facilities, etc. This concern arose from a number of perspectives, including the perceived imbalance in funds available to industry associations vs evident SWMB resources, incorrect estimates of staff numbers, lack of published targets and results, and a general interest in 'value for money'. Stakeholders noted the Five Year Plan for Injury and Illness Prevention called for annual reports on progress on the plan and that such a report had not been published.

Action Area 3 in the Five Year Prevention Plan indicates Manitoba's Chief Prevention Officer (CPO) will be responsible for evaluating and publicly reporting each year on progress made around all actions committed to under Manitoba's five year plan. Workplace Safety & Health reports the CPO completed a report for the years 2015 and 2016. A copy of this report was provided to the Minister on July 31, 2018. Once the Minister has had a chance to review the information, the report will be made publicly available in accordance with *The Workplace Safety and Health Act.*

As a division of the WCB, SAFE Work Manitoba reports on its performance in the WCB Annual Report. The 2015, 2016, and 2017 WCB Annual Reports include a series of metrics attributed to SAFE Work Manitoba, including Injury Rates (Total, Time Loss, Severe), days lost to injury, and percentage of payroll that is SAFE Work Certified. 2015 and 2016 Annual Reports also include information on activity (eg the number of safety and health information packages to new employers).

The total investment in prevention is reported in the 2014, 2015 and 2016 reports, and identifies amounts invested by SAFE Work as well as others, including the IBSPs.

The WCB identified concerns with simple return-on-investment calculations, particularly during a period of program development, since prevention activity is a long-term investment that pays off in the future.

The WCB maintains a Prevention Dashboard for reporting to the Board of Directors. This includes goals and targets for

- number and severity of injuries ✓
- participants attending training (SWMB and IBSP) (✓SWMB only)
- percentage of employers and workers served by an IBSP ✓
- access to prevention related information and data
- number of employers SAFEWork Certified ✓
- prevention awareness engagement and behavior

(Items with results reported in the 2017 Annual Report are indicated with a ✓)

Recommendation 8: MNP recommends including clear performance measures and targets in the next prevention plan, with at least the full content in the existing Prevention Dashboard. Reporting this information in future Annual Reports will then enable stakeholder understanding of the expected and realized impact of investments in prevention. Including progress achieved through IBSPs is important to an overall strategy in which they play a key part.

In the short term, given the repeated request for performance metrics, MNP recommends providing links to the appropriate page in the annual report from the SAFE Work website to make this information easier to find.

APPENDIX A – INTERVIEW PARTICIPANTS

The following representatives of key stakeholder organizations participated in an interview with MNP:

Stakeholder	Participants
WCB Prevention Committee	Chris Lorenc, Chair
Manitoba Employers Council	William Gardner, Chair
	Yvette Milner, Merit Contractors Association of MB
	Jeff Curtis, City of Winnipeg
	Jonathan Alward, Canadian Federation of Independent Business
Manitoba Federation of Labour	Kevin Rebeck, President
	Anna Rothney, Executive Director
	Greg McFarlane, Campaigns and Projects Coordinator
Winnipeg Construction Association Inc. (WCA) / Construction Association of Manitoba (CSAM)	Ron Hambley, President, WCA
	Mike Jones, Executive Director, CSAM
	Derek Pott, Operations Manager, CSAM
Manitoba Heavy Construction Association Inc. (MHCA) / WORK SAFELY	Don Hurst, Director, WORKSAFELY Education and Training, MHCA
	Jack Meseyton – MHCA Board member, co-owner EF Moon Construction
	Todd Turner – General Manager, EF Moon Construction
	Peter Paulic – MHCA Board member, Chair MHCA-WORKSAFELY Committee, Branch Manager, Brandt Tractor-Winnipeg
	Jeff Love – Safety Manager, Borland Construction
	Mike Burtnick – Safety Manager, Maple Leaf Construction
	Ray Bissonnette – Safety Manager, Nelson River Construction
	Wendy Freund Summerfield, Manager Finance and Human Resources, MHCA
Manitoba Trucking Association (MTA) / RPM Trucking Industry Safety	Terry Shaw, Executive Director, MTA
	Aaron Dolyniuk, Business Operations Manager, RPM

MNP LLP

Stakeholder	Participants
Canadian Manufacturers & Exporters Manitoba (CME) / MADE Safe	Ron Koslowski, Manitoba Vice President, CME Neal Curry, Executive Director, MADE Safe
Manitoba Motor Dealers Association Inc. (MMDA) / Motor Vehicle Safety Association of Manitoba (MVSAM)	Geoff Sine, Executive Director, MMDA Mallory Corbett, Director of Safety, MVSAM
Keystone Agricultural Producers Inc. (KAP) / Farm Safety Program (FSP)	James Battershill, General Manager, KAP Keith Castonguay, Program Director, FSP
Mining Association of Manitoba Inc.	Andrea McLandress, Executive Director Ian Cooper, Co-chair, Safety and Mine Rescue Committee
Workplace Safety and Health Branch	Crystal Baldwin, Acting Executive Director
Self-Insured Industry-Based Safety Program	Kent Blackmon, Co-chair Wally Skomoroh, Co-chair

APPENDIX B – STAKEHOLDER ENGAGEMENT GUIDE

Introduction

In 2013, Manitoba published *Manitoba's Five-Year Plan for Workplace Injury and Illness Prevention* (2013 to 2018).   The establishment of SAFE Work Manitoba was a key outcome of the Five-Year Plan.

The WCB is beginning development of its next Five-Year Strategy for Illness and Injury Prevention. To support this work, the WCB is seeking input from key stakeholders on the effectiveness of SAFE Work Manitoba's strategic initiatives, service offerings and activities that should be considered in development of the next five-year plan. MNP has been engaged as an independent third party to assist this process.

This is an invitation to you, as a representative of a key stakeholder organization, to participate in an interview to gain your insight and perspectives to support development of the next five-year plan.   You are welcome to include others from your organization in the interview as you choose. In addition to whatever input you provide through the interview, you are also welcome, though not required, to provide further input through a written submission.

Confidentiality

Individual feedback will be retained by MNP and will not be provided to WCB. Findings will be reported as summary themes, with no identifying information. If an organization elects to provide a formal written submission, the submission will be provided in its entirety to the WCB.

Background Information

Should you wish, background information on SAFE Work Manitoba and its activities may be accessed at www.SAFEManitoba.com. For convenience, some specific links are provided below:

Manitoba's Five-Year Plan for Workplace Injury and Illness Prevention
https://www.gov.mb.ca/labour/safety/pdf/workplace_injury_illness_prevention_web.pdf

SAFE Work Certified
https://www.safemanitoba.com/safe-work-certified/Pages/default.aspx
https://www.wcb.mb.ca/safe-work-certified-program-swcp

Prevention Rebate Program (Policy 52.40)
https://www.safemanitoba.com/files/Safe%20Certified/52_40%20Prevention%20Rebate%20Program%20Policy.pdf

Funding Industry-Based Safety Programs (Policy 52.20)
https://www.wcb.mb.ca/funding-industrybased-safety-programs

Injury and illness report (2007 to 2016)
https://www.safemanitoba.com/topics/Documents/2016%20Injury%20and%20Illness%20Report.pdf

Interview Questions

The following questions are provided in advance so that you may consider the topics we would like to discuss. You are not limited in your feedback by these questions. We would be pleased to take any additional input you may wish to provide.

1. Please tell me a bit about your organization, its involvement in prevention of work related injuries and illness, and how it interacts with SAFE Work Manitoba.

2. The last Five Year Plan for Workplace Injury and Illness Prevention identified four key principles:

   - Making Manitoba a prevention leader
   - Improved services, where they're needed most
   - Accountability, balance and fairness
   - A stronger role for all workplace stakeholders

   SAFE Work Manitoba was established to unify and consolidate prevention services as a single point of contact and to enable a clear focus on preventing workplace injury and illness in Manitoba. Do you believe SAFE Work is effectively focused on the principles in the plan?

   - *Examples of positive impact*
   - *Where more work still required*

   [Recognizing that these principles also apply to efforts beyond SAFE Work (e.g., CPO, WS&H legislation)]

3. One of the key action areas in the plan was a renewed role for business as a safety partner. The WCB and SAFE Work Manitoba share the vision of: *"A trusted partner, insuring today and building a safer tomorrow".*

    a. What does SAFE Work's role as a partner mean to you? What does that look like?
    b. What is your (or your organization's) experience working with SAFE Work as a partner?
        - *What worked well?*
        - *What could be improved?*

    [If no direct experience, please offer any observations where you may be aware of SAFE Work's activity to partner with other organizations]

    c. Please comment on your knowledge or experience of SAFE Work's activity to support and expand Industry Based Safety Programs (IBSPs).
        i.   Has this activity / these programs had an impact on access to relevant safety and health services?
        ii. Any comments on the partnership approach for this particular program?   Funding model?

4. Another key action area in the plan was stronger incentives for real prevention. Two key initiatives are Safe Work Certified and the Prevention Rebate.

    a. Please comment on your knowledge or experience with SAFE Work Certified.

        https://www.safemanitoba.com/Safe-Work-Certified/Pages/default.aspx

        i.   Has the certification process been established / customized for your industry sector?
        ii.   Has this program had an impact on adoption of meaningful safety prevention for your sector, for all sizes of business? What has the uptake been for employers in your sector?
        iii. Any comments on program administration / suggestions for improvement?

    b. The Prevention Rebate is available to Safe Work Certified employers. Please comment on your knowledge or experience with the Prevention Rebate.

        https://www.safemanitoba.com/files/Safe%20Certified/52_40%20Prevention%20Rebate%20Program%20Policy.pdf

        i.   Do you feel that the prevention incentive has encouraged investment in safe work? How has the rebate program been received by employers?

5. Are you familiar with the training and education services offered by SAFE Work MB? If yes, please tell us how? Can you comment on what you feel is working well? Opportunities for improvement?

        https://www.safemanitoba.com/education/pages/default.aspx

6. Other key action areas in the plan included
   - Focus on Manitoba's most vulnerable workers
     - https://www.safemanitoba.com/Campaigns/Pages/SAFE-Youth.aspx
   - Improved supports for small business
     - https://www.safemanitoba.com/topics/Pages/Small-Business.aspx
   - Addressing workplace mental health
     - https://www.safemanitoba.com/Topics/Pages/Psychological-Health-and-Safety-in-the-Workplace.aspx

   How effective has SAFE Work been in these areas?

   - *What is working well, positive impacts*
   - *Where there may be room to improve*

(For IBSPs and WSH)

7. We understand you have access to industry-based data via a portal. What information do you find useful? How do you use this information? Is there other information that would be useful for you?

(For others)

8. Have you worked with WCB to obtain information and data? What information have you accessed and how have you used it? What other data would be useful for you?

9. Are you familiar with SAFE Work Manitoba's general services / supports?
   - Information, resources, tools
   - Public awareness campaigns
   - SAFE Work Store

   How would you describe the effectiveness of these services / supports in enabling prevention activities and creating a safety culture in Manitoba workplaces?

   - *What seems to be working well?*
   - *Where might there be opportunity to improve?*

10. How would you define success for SAFE Work Manitoba? What are the right measures to understand prevention of work related injuries and illness in Manitoba? What targets should we be aiming for?

    [SAFE Work currently collects the following leading indicators to measure the success of injury and illness prevention in Manitoba.:
    - % workforce covered by an IBSP
    - % employers that are SAFE Work certified
    - # of SWMB courses taken, satisfaction
    - Media and social media exposure, website traffic, etc.]

11. What do you believe are the top priorities to achieving a culture of safety in Manitoba workplaces?

12. What is limiting progress? Are there specific barriers to achieving this vision? What is needed to address these barriers?

13. Other ideas or initiatives that should be considered in development of the next Five-Year Prevention Strategy?

Thank You!

MNP will provide you with summary notes of our interview to ensure we have captured your feedback correctly. Results of the overall stakeholder engagement will be shared with participants by the WCB.

APPENDIX C – WRITTEN SUBMISSIONS

The Manitoba Employers Council
2500 – 360 Main Street, Winnipeg, Manitoba R3C 4H6
(204) 956 - 3560, gardner@pitblado.com

Via Email

March 8, 2018

MNP
2500-201 Portage Avenue
Winnipeg, MB R3B 3K6

Attention: <u>Kathryn Graham</u>

Dear Ms Graham:

**RE: <u>Safe Work Stakeholder Consultation to Support Planning for
Manitoba Injury and Illness Prevention</u>**

Thank you for the opportunity to meet with you regarding this important matter.

Following the meeting, the Manitoba Employers Council passed a Resolution, a copy of which is attached.

We would ask that you please take this Resolution into account when you are preparing your Report. Thank you.

If you have any questions or wish to discuss this matter, please contact the writer at your convenience.

Yours very truly,

Manitoba Employers Council

Per:

**William S. Gardner
Chairperson**

Attach.

cc. MEC Members

MEC RESOLUTION
Review of SAFE Work Manitoba (SWMB) and
Development of WCB 5-Year Injury Prevention & Reduction Plan

The WCB has retained MNP to undertake a review of the effectiveness of SAFE Work Manitoba and assist in the development of a successor WCB five-year injury and illness reduction strategy. The report is expected by late spring.

The above initiative was initiated as a result of an MEC approach in 2017 to the provincial government calling for such a review.

In advancing the above, the MEC endorses inclusion of the following themes:

SWMB Mission should be to:

- champion workplace safety, education and training, to achieve measurable workplace injury, illness prevention and reduction, by:

  - enabling, facilitating and supporting, the long-term development, growth and delivery by Industry Based Safety Programs (IBSPs), of workplace safety education and training, designed to reduce the number, frequency, severity and duration of workplace incidents
  - the growth of IBSPs should be organic and driven by industry based on need and business case
  - identifying existing gaps in workplace safety education and training, and partnering with the private sector as its service provider, enable and facilitate its delivery
  - appropriate public messaging

The WCB 5-Year Injury Prevention & Reduction Plan at minimum should:

- embrace the above suggested SWMB mission
- identify measurable workplace injury reduction strategies and objectives
- ensure efficient, timely, responsive case management for injured workers including
  - efficient access to benefits
  - timely access to medical care for injured workers
  - support appropriate return to work practices for workers and employers
- coincident with a focused SWM mission and injury incident reduction trends, reduce WCB and SWM operating budgets
- continue focus on reducing WCB/SWMB administrative costs and coincident WCB premium reduction strategies

APPENDIX D – IAP2 SPECTRUM FOR PUBLIC PARTICIPATION

(Adapted only to reflect stakeholders vs public engagement)

	Inform	Consult	Involve	Collaborate	Empower
Stakeholder Engagement Goal	To provide stakeholders with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions	To obtain stakeholder feedback on analysis, alternatives and/or decisions	To work directly with stakeholders throughout the process to ensure that stakeholder concerns and aspirations are consistently understood and considered.	To partner with stakeholders in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision-making in the hands of stakeholders.
Promise to Stakeholders	We will keep you informed	We will keep you informed, listen to and acknowledge your concerns and aspirations, and provide feedback on how stakeholder input influenced the decision	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how stakeholder input influenced the decision	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

MNP

ABOUT MNP

MNP is one of the largest chartered accountancy and business consulting firms in Canada. For more than 65 years, we have proudly served and responded to the needs of our clients in the public, private and not-for-profit sectors. Through partner-led engagements, we provide a cost-effective approach to doing business and personalized strategies to help you succeed.

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