



## **Occupational Health and Safety Manual**

(This document is an abbreviated version of the full Occupational Health and Safety Management System Manual, which is available on the OHS website)

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## 1.0 Introduction

St. Francis Xavier University's (university) Occupational Health and Safety Management System (OHSMS) provides a framework to enable compliance with occupational health and safety (OHS) legislation and university policies and procedures. Specifically, it appries members of the university community of their duties and responsibilities to applicable legislation, relevant policies and procedures and reporting requirements.

The table below illustrates the document and record hierarchy within the university's OHSMS

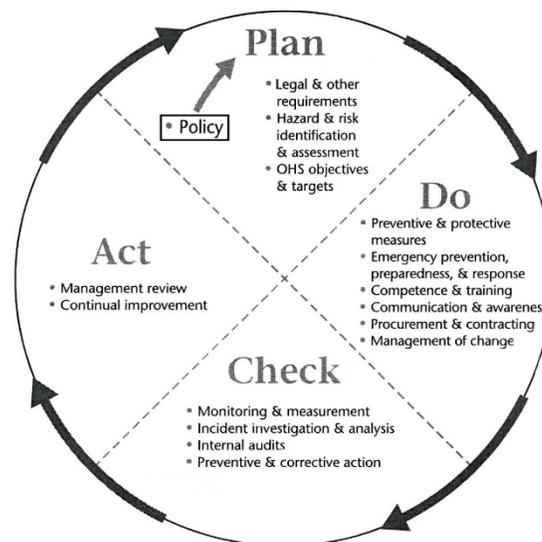
Level	Description
Policy	Overall statement and commitment to health and safety.
OHS Management System (OHSMS)	Overarching system that identifies system elements and outlines their integration within the OHSMS.
OHS Manual	Abbreviated document for distribution to employees, highlighting key parts of the OHSMS.
OHS Elements	Provides oversight and guidance on how elements within the OHSMS are to be implemented.
Programs and Safe Operating Procedures	Established programs and procedures to be followed when performing specific tasks.
Employee Handbooks	Specific to departments with hazards (FM, Ancillary Services, Student Services, etc.)
Forms, Checklists, Records, etc.	Documents that furnish objective evidence of activities performed or results achieved, records the outcomes.

The university's OHSMS consists of the following:

- Health and Safety Policy
- Health and Safety Elements
  - Document and record management
  - Communication
  - Competency, training and awareness
  - Hazard identification and risk management
  - Incident management
  - Contractor management and procurement
  - Assurance

- Employee Handbooks
- Health and Safety Programs and Safe Operating Procedures
- Forms, Checklists and Record

In addition to the framework and elements shown above, the university has adopted the Plan Do Check Act (PDCA) technique that serves as a practical tool to ensure continuous improvement in the workplace. The four steps: plan, do, check and act should be reviewed and repeated over time to ensure continuous learning and improvement.



## 2.0 Background

### 2.1 Legislation

The health and safety standards at the university must, at a minimum, meet the requirements of all applicable legislation as set by the various regulatory agencies. The Nova Scotia Occupational Health and Safety Act, the Occupational Safety General Regulations, the Workplace Health and Safety Regulations and associated regulations are the principal legislation governing workplace health and safety within the university. Other applicable legislation and associated regulations may include the Human Rights Act, Criminal Code of Canada, Nuclear Safety and Control Act, Human Pathogens and Toxins Act, Health of Animals Act and Radiation Health and Safety Act.

The Criminal Code of Canada establishes a positive duty on individuals and organizations to take "reasonable steps to prevent bodily harm" to workers, the public and others involved in workplace activity. The OHSMS provides a strategy to comply with this legislation.

## **2.2 Internal Responsibility System**

The [Occupational Health and Safety Act](#) is based on the concept that all every individual in an organization shares the responsibility for health and safety of persons at the workplace, and assumes that the primary responsibility for creating and maintaining a safe and healthy workplace should be that of each individual, to the extent of each their authority and ability to do so. This concept is known as the Internal Responsibility System (IRS).

## **2.3 Management of Health and Safety**

Health and safety is managed effectively by ensuring that:

- The university's health and safety policy is implemented and a framework to identify and control hazards is established.
- Individuals within the university community understand their role in health and safety.
- Health and safety is integrated into the management of all workplace activities and the individuals who direct the actions of others manage the risks of that activity and its associated health and safety requirements.
- The university community is provided guidance in meeting their obligations under legislation.

## **3.0 General Principles**

### **3.1 Responsibilities of the University**

It is ultimately the responsibility of the university's Board of Governors (BOG), through the university's senior administration, to ensure that all regulatory requirements are met, and appropriate standards are applied to ensure a healthy and safe workplace.

The responsibility to ensure adherence to university policies and procedures rests with all members of the university community. It is imperative that those who direct the actions of others understand and assume responsibilities in conformance with the provincial Occupational Health and Safety Act and Regulations. In addition, education, training, facilities and resources necessary to ensure compliance with applicable health and safety legislation must be provided by the university.

Dangerous working conditions must be addressed in conformance with provincial Occupational Health and Safety Act and Regulations or other applicable legislation.

**StFX's Incident Management System (SIMS)** must be used to report all incidents within the university including near miss events and health, safety and security hazards and concerns. This system offers a streamlined, timely and effective method of reporting and investigating incidents and hazards.

Supervisors must ensure appropriate follow-up or corrective action takes place when employees whom they supervise do not follow the OHS rules and regulations in their workplace.

An auditing system is necessary to monitor and review overall performance and commitment to health and safety. The results of these audits must be reviewed by the appropriate committee(s), senior administration of the university and by the Board of Governors.

### **3.2 Health and Safety Policy**

StFX's Health and Safety Policy was developed in accordance with section 36.2 of the Occupational Health and Safety Act. Under provincial legislation, this policy must be reviewed by the University Joint OHS Committee (UJOHSC) and signed by the President annually. This policy provides direction to the university community on the respective responsibilities of the various stakeholders. For this policy to be effective, it must be implemented in all areas of campus and supported by a robust OHSMS.

#### [Health and Safety Policy](#)

### **3.3 Organizational Structure**

In developing the organizational structure to support an OHSMS, the university has considered the:

- formal delegation of responsibility and authority for health and safety to specific individuals, as low in the organizational hierarchy as possible;
- formal consultation processes that are in place, including those of all trade unions, staff associations and Joint Occupational Health and Safety Committees (JOHSC);
- requirement to provide all staff with the facilities, materials, equipment, hazard information and resources needed to control risk of harm to an individual; and
- provision of technical resources through the Occupational Health and Safety (OHS) office.

### **4.0 Leadership and Accountability**

StFX University is regarded as the employer under the OHS Act and Regulations and is responsible for compliance with the Act and Regulations. Responsibility for workplace health and safety has been assigned to Senior Administrators who are responsible for the management of a Department, Division, or Faculty within the University. Each Senior Administrator must ensure that compliance is maintained in the part of the University which they lead. Each Director, Dean, Manager, Supervisor or Chair, throughout the University, is responsible for their staff and work location.

#### **4.1 Executive Committee**

The Executive Committee is responsible to:

- ensure that all the operations of the University comply with the Occupational Health and Safety Act and regulations and all orders and requirements of Occupational Health and Safety Officers of the NS Department of Labour, Skills and Immigration;
- ensure that all the operations of the University adhere to the Occupational Health and Safety Policy;
- ensure that all the operations of the University adhere to the requirements of the University's OHS Management System;
- ensure that there is strategic direction and planning for the university's OHS Management System and to implement the OHS Management System;
- integrate occupational health and safety in the university's business;
- allocate resources for health and safety programs and initiatives;
- ensure that program review or audit results of the OHS Management System are reviewed and appropriate action is taken; and
- ensure that responsibility/authority for workplace health and safety is delegated to trained and competent personnel.

The Vice President, Finance and Administration is the contact person on behalf of the Executive Committee.

#### ***4.2 Directors, Deans, Managers, Chairs and Supervisors***

Directors, Deans, Managers, Chairs and Supervisors are responsible to:

- ensure compliance with the Occupational Health and Safety Act and regulations within the portion of the workplace under their supervision;
- ensure that all the operations under their supervision adhere to the OHS Policy;
- ensure that all the operations under their supervision adhere to the requirements of the OHS Management System;
- integrate preventive health and safety practices into all activities;
- ensure that information and training are provided to employees to protect their health and safety;
- communicate information concerning workplace hazards and the necessary control procedures to be practiced to employees;
- hold employees accountable for following Safety Programs and Safe Operating Procedures (SOP);
- supervise employees and review work processes to ensure that employees work in the manner required;
- take action immediately upon any report or suspicion of unsafe or hazardous conditions or situations;
- undertake workplace inspections and conduct investigations of incidents, unsafe work refusals, concerns and complaints related to observed or suspected health and safety hazards, encouraging full participation in such inspections and investigations by representatives of their area JOHS Committee;

- cooperate with employees and the JOHS Committees to promote a healthy and safe workplace;
- respond in writing to recommendations from a JOHS Committee, when requested, and within the deadline specified in the OHS Act;
- cooperate with any person performing a duty under the OHS Act and regulations;
- ensure that all orders from and requirements of OHS Officers of the Department of Labour and Advanced Education are satisfied in a timely manner and report all such activities, including progress reports, to the University OHS Office; and
- co-operate with the staff of the University OHS Office in the evaluation of health and safety performance; and
- provide feedback on the operation of the OHS Management System.

#### **4.3 Employees**

Employees are responsible to:

- work in accordance with the OHS Act and regulations;
- adhere to the OHS Policy;
- adhere to the requirements of the OHS Management System;
- adhere to other policies and procedures on healthy and safe job performance;
- ensure that work activity and behaviour do not, through act or omission, place their own health and safety, or the health and safety of others, at risk;
- report all workplace hazards and any health and safety concerns to their immediate supervisor in a timely manner;
- report all personal injuries or work-related illness, property or equipment damage, and near-miss incidents to their immediate supervisor in a timely manner;
- follow established Safety Programs and SOPs and use machinery, equipment and materials only as authorized and as trained;
- wear personal protective equipment as required and as instructed;
- participate, wherever possible, in defining SOPs and in opportunities to protect and promote health and safety on the job; and
- Co-operate with the University JOHS Committees, the University OHS Office, or any person performing a duty under the OHS Act and regulations.

#### **4.4 Joint Occupational Health and Safety Committees (JOHSC)**

JOHSC committees are advisory bodies made up of representatives from management and workers. The committee provides a forum for communication between the employer and the worker to address health and safety concerns in the workplace to reduce workplace incidents and injuries. Committees:

- perform the functions of a joint occupational health and safety committee as defined in sections 29, 30 and 31 of the OHS Act and as required by the regulations;

- make recommendations for the establishment and enforcement of health and safety policies and practices;
- participate in the identification of hazards to health and safety and recommend means of controlling hazards;
- advise on and promote OHS programs for the education and information of all workplace occupants;
- receive, consider, and, where necessary, investigate complaints regarding health and safety in the workplace and make recommendations to the workplace supervisors, as required;
- maintain records in accordance with applicable legislation;
- review the information resulting from monitoring and measuring procedures, and, where necessary make recommendations to management;
- conduct workplace inspections; and
- participate in incident investigations, when required.

Due to the number of faculty and staff at StFX and the diversity of occupations and relative hazards, StFX has chosen to implement three Joint OHS Committees - a Facilities Management (FM) JOHSC, a Science JOHSC and a University JOHSC. The University JOHSC will regularly review the OHSMS and OHS Policy and provide representation for workplaces not covered under the FM and Science committees.

The Vice President, Finance and Administration delegates authority as follows:

- University JOHSC – Director of Risk Management
- FM JOHSC – Director of Facilities Management
- Science JOHSC - The Dean of Science

#### ***4.5 Occupational Health and Safety Office***

The OHS office serves as a resource to the university to assist all members to meet their obligations to provide a safe and healthy work, teaching and learning environment.

The OHS office takes a lead role in advising the university community on a wide range of health and safety issues and undertakes a central coordinating role for the development and implementation of health and safety programs. The OHS office is responsible for developing, maintaining and auditing the university's OHSMS.

The OHS office is responsible to:

- coordinate the yearly review of the OHS Policy;
- coordinate the development and implementation of the OHS Management System;
- monitor implementation of the OHS Policy and OHS Management System;
- provide consultative support services to management and employees on matters relating to occupational health and safety;

- provide statistical reports on university performance on key health and safety indicators;
- monitor, evaluate and audit occupational health and safety compliance and performance with legislated standards;
- support university initiatives to facilitate improvements in health and safety and to prevent workplace injuries and illnesses;
- liaise with unions, external agencies, and the Department of Labour and Advanced Education on health and safety issues;
- provide OHS orientation and some on-campus OHS training; and
- advise Joint OHS Committees and ensure administrative functions are maintained.

### **4.6 Safety & Security Services**

Safety & Security Services at StFX University strives to maintain a healthy, safe and secure campus community for students, faculty, staff and guests by developing partnerships within the University and Antigonish communities.

Safety & Security Services work closely with local law enforcement and community response teams to ensure we all can LIVE, LEARN, WORK and PLAY in a supportive and safe environment.

Safety & Security Services provides 24-hour coverage 365 days per year via the Safety & Security Operations Centre (SOC) as well as by vehicle and foot patrols. X-PATROL, the student staffed Safety & Security Leadership group, augments Safety & Security Services officers with campus event supervision and evening foot patrols.

Key responsibilities include:

- Perform foot and vehicle patrols of all University properties using/following proper security procedures to ensure the safeguard of people, materials and property against loss, theft, or damage.
- Responds to all requests for service or assistance; documents and reports as per applicable procedure.
- Responds to all disturbances, incidents, and emergencies in accordance with university policy and procedures and liaises with RCMP, EHS and Fire Service as required.
- Reports all hazards and maintenance issues in accordance with established protocols for routine or urgent response.
- Performs traffic control and parking duties as assigned and enforces motor vehicle regulations on university property.
- Supervises and supports casual Officers and X-PATROL student Safety & Security Services staff in the performance of event supervision, campus patrol, parking duties and walk-home service delivery.

#### **4.7 Employee participation**

StFX University recognizes and values the knowledge and skills of employees to perform their jobs safely and will promote a workplace culture where employees are supported and encouraged to contribute to improving occupational health and safety performance and, in the development, implementation and continual improvement of the OHS Management System.

The university commits to working in partnership with employees and their representatives, through the internal responsibility system, to develop and implement measures to eliminate and minimize the risk of occupational injury and illness in the workplace.

The University will facilitate full participation through:

- the consultative process by which the OHS Management System is developed and improved;
- employee participation in the process of hazard identification, risk assessment and risk control;
- employee participation in the development of Safety Programs and SOPs; and the training and orientation designed to further employee competence.

#### **Employee Rights**

All employees have three basic rights in Canadian workplaces, as follows:

##### **THE RIGHT TO KNOW**

You have a right to know about anything that may affect your health and safety in your workplace. You have the right to be informed of known or likely hazards in the workplace, and to be provided with the information, instructions, education, training and supervision necessary to protect your health and safety. This information should be provided before the work begins.

##### **THE RIGHT TO PARTICIPATE**

This right allows employees to have input on the steps taken by the employer to ensure health and safety. Employees can provide input on what would make the workplace safe by:

- participating as a member of a Joint OHS Committee.
- reporting any concerns to your supervisor when you encounter a health and safety matter that could cause harm to your health and safety or the health and safety of your co-workers.
- making suggestions on how to make your workplace safer.

##### **THE RIGHT TO REFUSE**

If you have reasonable grounds to believe that your work is unhealthy or dangerous to yourself or anyone else at your workplace you may exercise your right to refuse work. These are the steps you must follow to refuse such work:

1. Report to supervisor.
2. Remain at work, but go to a safe place, away from the hazard.
3. If not remedied to your satisfaction, you must report to a Joint OHS to investigate.
4. If still not remedied to your satisfaction, the matter will be referred to the Safety Branch (Department of Labour) for resolution.

## 5.0 OHSMS Elements

### 5.1 Document and Record Management

Documents that support the OHSMS as well as the maintenance of records is an integral part of the OHSMS. The document and record management element outlines the requirements for creation, maintenance and management of health and safety documents across the university; as well as the recordkeeping requirements for records required to be maintained as part of the university's OHSMS.

#### Safety Programs

Safety Programs are developed for critical or complicated tasks that contain clearly defined and detailed processes and requirements, including (but not limited to) training, competency verification, responsibilities, forms, etc. Most critical tasks require a program in the workplace to control identified hazards to help ensure employee safety. Employees must be trained in and follow all Programs that pertain to them. The requirement for Safety Programs is identified through the continuous and comprehensive hazard assessment processes and are reviewed by a JOHSC. All Safety Programs will be developed with input from the employees who do the work. They know the hazards best!

#### [Safety Programs](#)

#### Safe Operating Procedures

Safe Operating Procedures (SOPs) are a set of safe work practices and step-by-step instructions that are required in the workplace to control identified hazards to help ensure employee safety. Supervisors can contact OHS for assistance when identified hazards require an SOP. Employees must be trained in and follow all SOPs that pertain to them. SOPs must be reviewed yearly by a JOHSC. All SOPs will be developed with input from the employees who do the work. They understand the hazards best!

#### [Safe Operating Procedures](#)

#### Employee Handbooks

Employee Handbooks will be developed for departments that do hazardous work. OHS will work with department management to develop. The Handbook will include SOPs, Violence in the Workplace Prevention Plan and other department-specific safety information.

### **5.2 Communication**

Efficient communication is imperative to ensure that individuals are aware of their roles and responsibilities as they relate to health and safety. At the university, primary information dissemination of the OHSMS is communicated through the OHS website:

<https://www.mystfx.ca/ohs/>

The University Joint OHS Committee distributes safety bulletins and alerts and publishes a quarterly newsletter that is distributed by email. The OHS office maintains a central online Right to Know Bulletin Board that includes all OHS posting requirements:

<https://www.mystfx.ca/ohs/right-know-bulletin-board>

Area specific communications are the responsibility of the individual groups' organizational needs. Types of communications may include but are not limited to safety/toolbox talks, Joint OHS Committee meeting minutes, safety alerts and may be made available on workplace bulletin boards, in staff meetings, by email, or posted on safety signage.

### **5.3 Competency, Training and Awareness**

An integral part of the university's OHSMS is health and safety training related to the hazards associated with the workplace. The university provides faculty, staff and students with training directly related to the immediate workplace conditions. This training must be viewed as an integral part of the OHSMS.

The responsibility to ensure individuals receive appropriate university-based training, as prescribed by legislation rests with the individual's direct supervisor.

Supervisors must assess their workplace to determine training requirements, coordinate training and maintain documentation for the training provided. New employees must complete both general and job specific health and safety orientation. Employees and supervisors (or designate) are required to sign-off on completed orientation.

### **5.4 Hazard Identification and Risk Management**

The hazard identification and risk management element establishes a process for ongoing management of hazards and risks. Knowledge of hazards and the evaluation of associated risks is necessary to prevent injury and facility and equipment damage. The focus of hazard identification and the risk assessment process is to set priorities to control the identified risks.

### **5.5 Incident Management**

This element outlines the process for incident management including reporting and investigation. Incident investigation not only identifies who or what was involved and how an incident occurred but why it occurred, and the corrective actions required to prevent future similar incidents. This element:

- defines a process that ensures all incidents are reported, recorded and investigated in a timely manner to prevent recurrence;
- ensures that lessons learned from incident investigations are recognized and documented, corrective actions are implemented and communicated to prevent recurrence.

In the event of a serious injury that results from an incident, The Safety Branch of the NS Department of Labour must be informed, as per provincial Occupational Health and Safety Act and Regulations. Depending on the seriousness of the injury, a Safety Branch officer may be required to attend the incident scene as a part of the investigation.

From an emergency management perspective, the severity of the incident and level of impact on university operations will determine the action required.

### ***5.6 Contractor Management and Procurement***

Validation is required for all vendors, including contractors and service providers, who do work on StFX properties. Any department that retains the services of a contractor must ensure the contractor safety program is adhered to as it establishes the requirements for the administration and monitoring of contractor health and safety programs and activities at the university.

#### Procurement

When purchasing items that have OHS implications, please contact the OHS office for assistance, as required. Some things to consider:

- documentation on safe use and handling of machinery and equipment, such as manufacturer's safe use instructions
- WHMIS supplier labels and safety data sheets
- manufacturer's technical specifications (e.g., specifications regarding noise levels, voltage, or guards)
- ergonomic and human factors
- training associated with the use of purchased products, supplies, and equipment
- the handling and disposal of purchased products, supplies, and equipment after use
- requirements in law, codes or industry standards
- JOHSC involvement

### ***5.7 Assurance***

Assurance is a vital part of the continuous improvement process of the OHSMS. The assurance element outlines the process that the university will follow to inspect, monitor and audit, a complete an annual management review of the OHSMS.

### 5.7.1 Inspections

The principle behind conducting inspections of a work area is to identify the presence of hazards or noncompliant practices requiring control measures or other remedies and to provide an opportunity to correct any problem(s) so that an injury and/or loss does not occur.

The university has adopted a three-tier inspection framework:

Inspection Type	Group Conducting
Class A - Inspections involving high hazard areas/activities	OHS office and university subject matter experts
Class B – Supervisory level inspections focused on their specific workplace	Supervisor
Class C - General workplace inspections	University Joint OHS Committee

Risk Management performs inspections on high hazard areas on a regular basis (Class A). These inspections include, but are not limited to, the various types of laboratories on campus, life safety equipment and construction projects.

Inspections at the department level (Class B) enable a supervisor to determine whether the standards required by the university and legislation are being complied with and fully implemented. Supervisors will work with the OHS Office to develop department-specific inspection checklists. Inspections are required to be completed monthly and the checklist is used to document each completed inspection. Supervisors must regularly review and update the checklist.

Supervisors must communicate the findings of inspections to employees that may encounter the hazards identified. Supervisors must also ensure that corrective action is taken so that hazards are eliminated or controlled. If compliance issues exist, the supervisor must ensure that the necessary steps are taken to correct deficiencies

Joint OHS Committees develop inspection schedules so that each general workplace (Class C) is inspected annually. These include office and low hazard areas on campus.

Completed inspection reports for Class A and B inspections shall be forwarded to the department head and their respective Joint OHS Committee on a quarterly basis for review. Completed inspection reports for Class C inspections shall be forwarded to the OHS office and will be shared with the University Joint OHS Committee on a quarterly basis for review. All

inspection reports must be readily available for review by the OHS office and third-party agencies.

### 5.7.2 Monitoring and Auditing

Monitoring and auditing activities provide an opportunity to evaluate existing processes and determine if they are effective in controlling risk. An annual review of the OHSMS shall be completed by senior management and OHS unit. The primary purpose of measuring OHS performance is to determine the effectiveness of the processes established to control risk, and identify areas where corrective actions are needed for continuous improvement.

The OHS Office holds the central monitoring and auditing function for the OHSMS and at a minimum will:

- review the Health and Safety Policy;
- review the hazard control programs;
- review the administration of the Joint OHS Committees;
- review the execution of department workplace inspection, particularly in high risk operations;
- follow-up on serious or potentially serious incidents; and
- conduct compliance audits (by department and hazard category).

Departments are responsible to ensure compliance within their individual groups to the OHSMS.

The main objectives of the audit review process are:

- identify opportunities for operational and process improvements that add value to the department and contribute to better health and safety management of a workplace;
- provide a formal opportunity for senior administrators and department heads to identify areas of concern which directly impact on their health and safety responsibilities; and
- provide senior administrators and the Board of Governors with an overview of each area's level of compliance with the required legislation and policies of the university.

### 5.7.3 Management Review of OHSMS

The management review process provides an opportunity for senior management and the OHS office to evaluate the OHSMS for continuing adequacy, suitability and effectiveness. As part of this process, inspection and audit results will be reviewed as well as the overall occupational health and safety performance of the university.

The University Joint OHS Committee reviews the Health and Safety Policy annually and recommends approval by the President. The annual policy review and re-approval is a legislated requirement under the OH&S Act.

## **5.8 Emergency Preparedness**

The Risk Management office is responsible for facilitating the development, implementation and maintenance of the Emergency Management System, which includes all-hazard emergency management plans. The Emergency Management plans are campuswide, site specific and encompass the four pillars (preparedness, prevention/mitigation, response and recovery) of Emergency Management as recommended by Public Safety Canada.

### ***5.8.1 Violence in the Workplace***

The StFX Violence in the Workplace Policy Prevention and Response Plan outlines the university's commitment to the prevention of violence in the workplace. While violent acts are not pervasive at StFX, no university is immune from such behaviour. StFX University acknowledges that violence in the workplace is an occupational health and safety hazard that can cause physical and emotional harm. The University views any acts of violence or threats of violence in the workplace as unacceptable. As such, it is committed to working to eliminate workplace violence and to responding in an appropriate manner if it occurs. All members of the University community, including faculty, staff, students and visitors, are responsible for the creation and maintenance of a safe environment.

## **5.9 Disability Management**

Disability management is a process of communication between the employer and the injured or ill worker during the initial stages of recovery and during the subsequent return to productive employment. It aims to assist workers to return to work at a pace and in a position which is appropriate to their level of recovery. The Department of Human Resources (HR) facilitates the disability management process on behalf of the university.

## **6.0 OHSMS Annual Report**

OHS provides an annual report on the level of university compliance with the requirements of the applicable health and safety and environmental legislation. This report is produced for review by Joint OHS committees and the Executive Committee.