

**EVALUATION OF THE
CERTIFICATE OF RECOGNITION (COR)
PROGRAM

SYNTHESIS REPORT**

Final Report

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Prepared for:

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1.0 Introduction

PRA Inc. was engaged by Alberta Labour to conduct an evaluation of the Certificate of Recognition (COR) program. The goal of the evaluation is to measure progress towards the achievement of expected outcomes and provide recommendations to support continuous improvement. The program's role, in light of the introduction of Bill 30, *An Act to Protect the Health and Well-being of Working Albertans*, was also examined.

The specific objectives of the COR program evaluation are as follows:

- ▶ Assess the alignment between the objectives and structure of the COR program, including the roles and responsibilities of program stakeholders (i.e., PIR, WCB, CPs, Auditors, Partners, and COR holders).
- ▶ Determine the extent to which the implementation of the COR program supports the achievement of program objectives (i.e., to encourage Alberta employers to build occupational health and safety (OHS) management systems and reduce work-related injuries and illness).
- ▶ Identify the impacts of the COR program, including stakeholder perceptions on the program's effectiveness.

1.1 Methodology

This evaluation involved multiple lines of evidence, involving both quantitative and qualitative techniques.

Key informant interviews were conducted with 21 individuals representing Certifying Partners (CPs), Partnerships in Injury Reduction (PIR), and the Workers Compensation Board – Alberta (WCB). These one-on-one telephone interviews involved:

- ▶ 12 CPs
- ▶ 5 PIR staff
- ▶ 4 WCB staff

A technical report on the findings from these key informant interviews was produced separately.

Twelve focus groups were conducted with various stakeholder groups and in total involved 80 participants:

- ▶ 4 focus groups with COR/SECOR¹ holders (n=35)
- ▶ 4 with lapsed COR/SECOR holders (n=16)
- ▶ 2 with auditors (n=15)
- ▶ 1 with Non-COR holders (n=5)
- ▶ 1 with Partners in Health and Safety (n=9)

¹ Small Employer Certificate of Recognition

A technical report on the findings from the focus groups was produced separately.

Two distinct quantitative surveys were conducted involving a mix of online and telephone methods:

- ▶ survey of COR holders (n=800)
- ▶ survey of Non-COR holders (n=400)

As part of the 2003 evaluation of the program, a survey of COR and Non-COR holders was conducted and was used, where possible, as a basis for comparison over time.

A technical report on the findings from these two surveys was produced separately.

This report uses these various lines of evidence to address the evaluation questions developed by Alberta Labour. As well, this report provides recommendations based on these findings.

2.0 Evaluation questions

Alberta Labour produced a detailed evaluation framework that identified 16 evaluation questions that were to be addressed by this quantitative and qualitative research. Below we present the evaluation questions and a summary of the findings that address them. More detail on each of the lines of evidence can be found in the technical reports.

2.1 Need for COR

Is there a demonstrated need for the COR program in Alberta?

All lines of evidence strongly suggest that there is a demonstrated need for the COR program in Alberta.

Almost all key informants, whether representatives from the CPs, PIR, or WCB, said the COR program plays an important role in providing a framework for health and safety systems. This includes the tools to build a system, a method of measuring compliance to a program standard, and processes to improve poor performance. It is an established system that covers 80% of large employers and almost 50% of the workers in the province.

Partners in Health and Safety made similar pronouncements. They value a robust health and safety system and see a need for COR. It provides a standard that ensures that the health and safety system is doing what is intended. Among external auditors, all but one said COR was a vital part of health and safety in the workplace. Some external auditors, while recognizing their role is to provide a measure against a defined standard, were often frustrated that they could not do more to guide improvements.

About 9 in 10 current COR holders surveyed report that they are very likely to renew their organization's COR, suggesting that COR is valued in the province. In part, this reflects the fact that over 8 in 10 COR holders are satisfied with the program, and almost all could identify several benefits of being a COR holder. About half would be considered promoters of the program, that is, providing a rating of 9 or 10 out of 10, where 10 means they are extremely likely to recommend the program to others.

For COR and SECOR holders, the primary need for the COR program is that it is a requirement for most to be able to bid on and win contracts from the private and public sector. If this requirement was removed, most focus group participants implied that they would be unlikely to continue with the COR program due to the amount of time required to manage it. For a few, the COR program is needed for the WCB rebate, but again, without the rebate, they would be unlikely to participate in it. Without COR, a large number of workplaces might maintain a health and safety system, but these would not be measured against a set standard.

Currently, only about half of Non-COR organizations reported that their organizations had a formal or documented health and safety management system. Although many are unaware of the COR program, and those that are do not understand the details, over 20% of Non-COR holders are interested in achieving a COR.

2.2 Program objectives

Do program stakeholders have a shared understanding of program objectives and their roles and responsibilities?

Objectives

According to Alberta Labour, the objective of the COR program is *to encourage Alberta employers to build OHS management systems and reduce work-related injuries and illness*. Across all lines of evidence, there is a general consensus that the program's goal is to encourage Alberta workplaces to adopt a health and safety management system that meets a particular standard. While some would also argue that the primary objective is to reduce work-related injuries and illness, some were less convinced that this objective was being met. The most common divergence as to the objectives of the program is whether the program is about meeting a minimum standard or about continuous improvement.

Some COR holders said that while the objectives of the program might not have changed, for COR holders the objective has morphed into a program that qualifies companies to be able to do business in certain sectors. Among our COR holders who participated in the survey, the most common goals of the program were: providing or encouraging safety in the workplace (40%), measuring performance or compliance against a set of standards (25%), providing the framework for a health and safety management system (17%), and reducing the number of workplace injuries or accidents (16%).

Roles and responsibilities

Most key informants (CPs, PIR, WCB) and focus group participants (auditors and Partners in Health and Safety) have a good grasp of the objectives of the program and their own roles and responsibilities. As might be expected, organizations and individuals tend to have a better understanding of their own roles than those of other stakeholders. Generally, key informants demonstrate a good, but basic understanding of the roles and responsibilities of PIR, WCB, CPs, COR holders, and auditors. The one weak link was Partners in Health and Safety; many could only describe its role in vague terms or not at all. Indeed, most Partners freely admitted that the role of Partners was not well known. Partners believe they are supposed to promote workplace health and safety in general and COR in particular, and act as a resource to others. However, they report that more could be done to engage them in these activities.

Among COR holders who were surveyed, a majority could not agree which stakeholder group was responsible for what activity. A majority assume that employers are mainly responsible for ensuring audits are completed so that COR is maintained (66%) and that the WCB is responsible for the rebate (61%), but there was little agreement on other responsibilities. COR holders were particularly confused by Partners in Health and Safety, who many assumed were the Partnerships in Injury Reduction (PIR).

2.3 Benefits of COR

What are the program benefits and challenges from the perspective of stakeholders?

There was much consensus across all lines of evidence as to the benefits of COR.

According to key informants, COR is said to provide many benefits. These include: framework and tools to build an effective health and safety management system; a quality assurance process through regular audits, and also through such things as the Employer Review Program (ERP); a consistent set of standards that have remained similar over time; and greater safety for workers in Alberta.

Partners focussed on the health and safety benefits of COR, indicating that it is responsible for introducing safety into many workplaces, making safety culture the norm in their workplaces, and constantly keeping health and safety at the forefront because of audits and the need for continuous improvement. External auditors also took a big picture view of the benefits, saying that the greatest benefit is that it is keeping people safe. Internal auditors reported that COR's greatest benefit is that it provides a baseline against which to measure success and improvement.

Among COR holders, the biggest benefit is likely reflective in the main reason they initially got a COR: to be able to bid on projects (75%). However, when asked specifically about benefits, COR holders most often selected the following: increased safety awareness and maintaining a safe working environment (80%), reduction in WCB rate or getting the PIR incentive (70%), and the reduction in injuries and accidents (58%).

2.4 Challenges of COR

What are the program benefits and challenges from the perspective of stakeholders?

As with the benefits, there tends to be consensus on the challenges of COR.

Among our key informants, the challenges identified include: COR sets a minimum standard that does not encourage continuous improvement; COR is not mandatory, especially in high-risk industries; auditors do not always apply the standards as intended; CP shopping, which allows employers to select a CP that has standards that are easier to meet; and that employers who use consultant auditors are allowed to choose their auditor. In addition, some said the program does not have enough tools to deal with persistent poor performers, and that change to the program, and its standards, comes too slowly. One informant also thought that one of the weaknesses of COR is that it is too expensive in terms of time and money, which discourages participation.

External auditors cited these challenges: maintaining COR, which usually is about the time and resources an organization needs to devote to it; that continuous improvement is not always the goal of organizations; that it is not seen as important by the organization (because the main reason for having a COR is bidding, not health and safety); and the quality and consistency of audits and auditors. Internal auditors said the biggest challenge is time.

According to COR holders, the biggest challenge of COR is that it is time consuming, involving too much paperwork and administration (67%).

2.5 New OHS Act

How do stakeholders perceive the program in light of changes to the OHS Act?

Even with the changes to the *OHS Act*, almost all key informant stakeholders indicated that the COR program remained a vital part of workplace health and safety in the province. Many CPs saw the new Act as an opportunity, since the legislation prescribes what must be done, but does not describe how to do it. Many CPs also believe that COR provides the framework for any organization that wants to meet the requirements of the *OHS Act*. Many said that legislation does not necessarily result in action unless there is a comprehensive compliance system in place. The COR program provides such a system and is currently measuring compliance of workplaces throughout the province.

Partners and external auditors believe that the new Act would not change COR, since COR is not about compliance with legislation, but about meeting a specific standard. Most internal auditors believe that they are already compliant with the new Act because their organizations are COR holders, thus little will change as a result of the legislation.

While a majority of COR holders (65%) surveyed are aware of the new *OHS Act* that comes into effect in June 2018, many are not. And even among those who are, only about 4 in 10 felt they are fully or mostly informed. Even so, COR holders are much more aware than Non-COR holders, of which only about 1 in 3 (36%) are aware of the new Act. Of those, only 32% say that they are fully or mostly informed. Once they are informed about the details, most COR holders (69%) and Non-COR holders (63%) say that the new Act will have no impact on their organization.

Almost all COR holders stated that the new legislation would make no difference (85%, or, in a few cases, make it more likely—6%) in terms of their decision to maintain their COR, and only 2% say it would make them less likely to get a COR. Similarly, most Non-COR holders say that the new Act will make no difference (68%) in their interest in getting a COR (most others did not know—16%).

2.6 Time and cost of COR

Are the timelines and financial costs for the COR process acceptable?

As already mentioned, paperwork (67%) was the single most common challenge of maintaining a COR, and this was followed by cost (26%).

When asked directly, a majority of respondents indicated that the time and effort to get and maintain a COR is reasonable and that they are satisfied with the cost. However, many are not. This is particularly true of small employers (30 workers or fewer). They are much less likely than medium and large employers to believe that the time and costs associated with COR are reasonable. Indeed, 45% of COR holders that are small employers disagree that they are satisfied with the cost of COR and 39% disagree that the time involved in maintaining their COR was reasonable.

Among internal auditors, even for small organizations, they report that they are involved full time for 10 days (approximately two weeks) to prepare, conduct, and report on a maintenance audits. Participants from larger organizations report longer audit periods; indeed, one very large employer said that they finish one audit and immediately begin preparing for the next.

2.7 Factors influencing participation

What are the main factors that influence program participation?

According to our focus group participants, the two factors influencing participation are needing COR/SECOR in order to obtain work and the rebate. The importance of these factors tended to depend on the industry/sector and the size of the company; the larger the company, the greater the influence of the rebate. In some sectors/industries, having a COR/SECOR was not a requirement to obtain contracts.

This is reflected in the survey findings. The biggest factor that influenced COR holders to achieve a COR was that it is required to bid on projects (75%). Also a commonly selected factor influencing their decision to participate was the WCB rebate (57%). However, other factors do play a role, including: to develop an effective health and safety management system (64%); that it is good business practice (51%), and to protect workers and increase workers' morale (44%).

2.8 Barriers to program participation

What are the main barriers to program participation?

Among Non-COR holders, the main barrier to participating in the program appears to be awareness; over 4 in 10 (45%) have not heard of the COR program. Even among the 56% who have heard of the program, only about half (46%) are fully or mostly informed about it.

Given that small employers (30 workers or less) make up about 88% of our sample of non-COR holders, it is not surprising that the most common reason for not participating in COR is the organization's size; they believe they are too small (49%). Others do not believe there is a need because their workplace has a low risk of injury or incidents (28%). However, many also said that the financial cost of COR is too high (36%).

2.9 Use COR to address new Act

Could employers use COR guidelines to establish OHS programs as required by the new Act, without the formal audit process?

While a majority are aware of the new legislation, few report being fully informed about it. Among both COR and Non-COR respondents, most think the changes will have no impact on their workplace; thus, it does not appear that having a COR improves employers' perceptions that they meet the requirements in any significant way.

Most often COR holders believe that the new Act will have no impact on them because they already have a good health and safety system in place and feel that they already meet the new legislation (55%). More specifically, many said that they thought COR meets all the changes (10%). Among Non-COR holders, most simply say that the new Act will have no impact because they are too small (i.e., have fewer than 20 workers—43%).

2.10 Elements to be added

Are there additional elements, best practices, or requirements that should be included in the COR program?

Key informants and focus group participants were asked what additional elements, best practices, or requirements should be included in the COR program.

- ▶ **Nothing needs to be added.** Most often, current COR holders saw no need for additional elements. Some other stakeholders agree, saying that addition elements will make COR too onerous and that “it’s already taking up a lot of time and resources for us.”
- ▶ **Include all elements from the new *OHS Act*.** Many CPs and PIR informants said that the COR needs to be updated to include elements that are required in the new *OHS Act*.
- ▶ **Engagement.** Some COR holders said that there should be a method of measuring the commitment of management and workers to safety/safety culture. Partners also spoke of something similar, referring to elements of two-way communication.
- ▶ **Psychosocial policies.** Several CPs, PIR, WCB, and Partners mentioned the need for workplaces to have policies on such things as harassment and violence, mental health, and bullying. One also suggested that the standards should include a policy on impairment (i.e., drugs and alcohol).
- ▶ **Competency.** Although COR already includes this element, it was suggested that workplace competency and training need to be enhanced so that skills-based assessments of workers are required.
- ▶ **Monitoring.** COR should include an element on continuous improvement (CPs). They should be tracked to see if they are improving and making changes that lead to positive outcomes. There should be monitoring to develop leading indicators (external auditors).
- ▶ **Other.** Individual informants suggested these additions: first aid training, incident reporting, behaviour management, preventative maintenance, and fatigue management. These elements might be optional or only applicable to specific industries.

2.11 Choosing another CP

What are the main factors that influence the decision of COR holders who are members of a funded safety association (because they are in a WCB levied industry) to choose another CP that is not funded (resulting in extra costs)?

About 15% of COR holders have used a Certifying Partner that is not associated with their industry. There are a variety of reasons that COR holders select a CP outside their industry. Some do so to get some advantage: cost to achieve and maintain a COR (24%), auditor is affiliated with a different Certifying Partner (18%); or a better audit instrument (14%). Others do so out of necessity: industry requires a specific Certifying Partner (18%) or geographic or location considerations (10%).

2.12 Triggers and ERP

What are the most common Employer Review triggers indicating potential of deficiencies in health and safety management systems among COR holders?

External auditors cited these as common triggers: high incident rates, being a poor performer compared to your industry, and having reportable incidents to OHS. Internal auditors could name several triggers as well: high WCB claims, numerous lost-time claims, high severity incidents, a poor audit score, and the COR audit itself.

2.13 Poor performers

How effective are the processes in place to improve health and safety outcomes for poor performing COR holders?

Many key informants mentioned the ERP and On-Site Audit Review (OSAR) programs as methods of improving health and safety outcomes for poor performance. Many CPs mentioned that COR should be more about continuous improvement, which would also address the issue of poor performing COR holders. Indeed, several CPs indicated that they already work with employers to identify gaps in their system so as to prevent poor performance. Both PIR and some CPs believe CPs could do more to address poor performance.

Some CPs want to have greater access to information about employers who are not performing well, better leading indicators of performance so that they can proactively intervene, and to be more involved in action plans.

Some Partners said that when it comes to poor performing COR holders, the communication among stakeholders is poor. They thought more should be done to share information about poor performance and how they could more proactively identify organizations before their performance triggered the ERP.

One internal auditor had direct experience with the ERP and thought it resulted in improved outcomes. One external auditor questioned whether the current system was effective at identifying poor performers. A few others were skeptical if an ERP resulted in improved outcomes, saying the PIR often does not understand the sector well enough to help it. There was a suggestion that auditors should be consulted about poor performance because they should be able to identify trends (especially in specific industries) that might lead to triggers.

2.14 Health and safety practices developed

Which health and safety practices are developed or enhanced through the COR process?

According to key informants, COR has resulted in a comprehensive training regime to support workplace health and safety systems and the certification of auditors. COR provides a framework which allows almost any employer to put in place an effective health and safety system. In particular, COR was said to have developed or enhanced hazard control, management commitment to workplace health and safety, meaningful worker participation in health and safety, incident investigation, and gap analysis. COR has raised awareness of the importance of workplace health and safety generally, and created a safety culture within those workplaces where it has been adopted. Overall, the COR program was said to have reduced workplace injuries.

Many auditors would say that workplace health and safety in general has been enhanced through the COR process. It is what has encouraged many workplaces to first adopt a health and safety management system, and in some cases, it has resulted in continuous improvement. COR is also credited with keeping workers safe. Most importantly, COR has in place an audit system that allows companies to understand how well their system is doing against a recognized standard.

Overall, in the focus groups, COR holder participants did not identify many ways that the COR process develops or enhances safety practices. In fact, most participants said that they did not have to change their health and safety practices substantially to obtain their COR/SECOR, but rather, it changed how workers documented that they were working safely. In a few instances, participants identified one or two enhancements that may have been identified through training or an audit, but these were often small changes (e.g., wearing safety glasses when cleaning the windows of a truck with glass cleaner).

2.15 Claims suppression

What effect does claim suppression have on health and safety outcomes?

Most key informants believed that COR holders are more likely to report injuries than Non-COR holders because there is greater awareness of the need to report and there is a process in place for reporting. Further, COR holders tend to be in higher risk industries, meaning that there is a greater chance of injuries. While many agreed that suppression exists, especially among Non-COR holders, most thought it was not significant and results more from ignorance than willfulness.

About half of COR holders (52%) and about 4 in 10 Non-COR holders (38%) believe that it is somewhat or very common for workplace injuries to go unreported to the WCB by insured employers. While some think this is a result of not knowing what a reportable injury is (39% of COR holder and 46% of Non-COR holders), many others believe it is intentionally done in order to keep their WCB rates lower than they otherwise would be (69% of COR holder and 49% of Non-COR holders), or to continue to get work (38% and 20% respectively) or incentives (30% and 20%).

2.16 Improvements

What are the perceived program strengths, challenges, deficiencies and potential areas for improvement?

Key informant suggested improvements to the COR program were mostly regarding the standards. Many noted that, at a minimum, COR needed to include all the elements contained in the new *OHS Act*, including such things as a workplace health and safety committee and contractor management. Many said that COR should go above and beyond the minimum as set out in the Act and be the “gold standard” for health and safety (though not all agreed with this, saying COR should remain an entry-level program, obtainable by all). Many said that COR should be about continuous improvement. Some suggested that the program should be tiered with the entry level remaining a minimum standard, but that over time, companies would need to obtain a higher standard.

Other improvements recommended by key informants include:

- ▶ that employers should not be allowed to choose external auditors, rather they should be assigned by a third party (the CPs);
- ▶ COR should be mandatory for high-risk industries;
- ▶ there should be more methods to motivate poor performers to take corrective action (for example, PIR should be able to suspend or decertify COR holders that consistently perform poorly and CPs should be able to deny a certification to employers); and
- ▶ the COR standards need to be easier to change in order to accommodate new health and safety practices.

While all Partners valued the COR program, the biggest challenge for organizations (regardless of their size) is the time and cost of maintaining a COR. A suggested improvement is greater flexibility in auditing, such as making them less frequent, but also diverting those resources into improving the health and management system. Another Partner suggested streamlining some aspects of the audit, especially for large organizations.

For internal auditors, the biggest challenge was time (especially for those who have other duties outside COR). Among external auditors, a number of challenges were identified, including the time and cost of maintaining COR. For some, an important improvement is the training of auditors, which many said was inconsistent, resulting in auditors with varying levels of competency. Similarly, some internal auditors wished they had more support when they did their first audit, possibly using a mentoring system.

3.0 Recommendations

Below we outline the key learning from the evaluation and the resulting recommendations.

3.1 COR is needed

COR has resulted in health and safety management systems in over 11,000 workplaces in Alberta, all of which are monitored to a standard. COR provides the framework and support to help organizations build a health and safety program. Without COR, it is unlikely that workplaces would be able to easily construct an effective health and safety management system. COR provides the means to audit workplaces to a standard and thus demonstrates that workplaces are doing what they say they will commit to. Almost all stakeholders said COR plays a valuable role in workplace health and safety in Alberta, although some COR holders said that, if COR did not exist, their industry would simply adopt another standard required to bid on work.

Recommendation 1: The COR program provides value and should continue.

3.2 COR means different things to different stakeholders

As an acronym, “COR” suggests that the program provides the “core” elements; that is, the most essential parts of a health and safety system. However, what is essential is often in the eye of the beholder. Some say COR is an entry-level or basic health and safety system, while others think it is the gold standard. Some believe that by having a COR, they automatically meet all legislated health and safety requirements. Others say the system is not about compliance to anything but the elements included in the program.

Recommendation 2: Efforts should be made to clarify the objectives of COR so all stakeholders understand the intent of the program.

3.3 What COR should be

There are significant differences of opinion as to what COR should be, especially given the new *OHS Act*. Many think it should be the basis for continuous improvement of health and safety systems (including compliance with legislation), while others say it needs to remain a minimum standard to encourage participation.

Recommendation 3: Consider adapting COR so that there are different levels within the program. The current elements (plus any new elements that will be added to meet the requirements of the new Act) could be an entry level or basic version, while COR Plus (or some other name) would indicate that a higher standard has been achieved and is being maintained.

3.4 External auditors

Auditors are the lynchpin of the system; they are the front-line workers who pass or fail employers. Inherent in the current method of the selection of the auditor is a conflict of interest. Employers can choose any external auditors they want. It was not clear that auditor shopping is a significant problem, but it could undermine trust in the system.

Recommendation 4: Consideration should be given to assigning auditors to employers, or limiting the number of times the same auditor can audit the same organization.

3.5 Internal auditors

Most internal auditors indicated that their training was adequate. However, many internal auditors said that the biggest challenge they faced was to efficiently and effectively conduct their first audit. They suggested more supports were required for the first internal audit after training.

Recommendation 5: Encourage CPs to require that the first internal audit be supported by an experienced auditor who will assist the new auditor to design, execute, and report on the audit.

3.6 Certifying Partners

Some CPs provide a minimum standard that meet COR, while others enforce a standard that goes beyond COR and is industry specific. Some CPs and COR holders felt it is unfair that organizations can choose any CP, meaning two organizations in the same industry are being audited to different standards.

Recommendation 6: Consideration should be given to requiring employers to be members of, and audited by, that industry's CP.

3.7 Stakeholders

The roles and responsibilities of employers and the WCB are understood by most, but others seem to be unclear as to who is responsible for what. Some of this confusion comes from the naming convention that over-emphasizes “partners,” so stakeholder names are not always clear as to their role. Others admit that their responsibilities have not been well defined (e.g., Partners in Health and Safety), and wondered if they served any useful purpose.

Recommendation 7: More should be done to promote (and explain) the role and responsibility of Partners in Health and Safety. As ambassadors for workplace health and safety, they should have consistent and clear roles and responsibilities.

Recommendation 8: Consider renaming some of the stakeholder groups so that the terms “partners” and “partnership” are not so prevalent.

3.8 Poor performers

While there are tools to change the outcomes of poor performers (the Employer Review Program being identified as the most effective), many say more tools are needed.

Recommendation 9: PIR should be given the power to suspend or revoke the COR of those employers who continue to perform poorly.

Recommendation 10: PIR should consult and work with other stakeholders to develop a strategy whereby all are helping to identify and assist employers that are performing poorly. The focus should be on prevention with the program being more proactive rather than reactive to triggers.

3.9 Make COR mandatory

The call for making COR mandatory is partly about levelling the playing field (some organizations wonder why COR is said to be required, when others working in the same sector do not have it). The requirement by some industry sectors that a COR is necessary to bid on work has been mostly successful in this regard, but suggests that it should simply be mandatory for specific industries.

Recommendation 11: Consider making COR mandatory for all high-risk industries.

3.10 Time and cost

A significant minority of COR holders (but especially small employers) are challenged by the amount of time (usually referred to as “paperwork”) that is required to get and maintain their COR.

Recommendation 12: Reduce the amount of paperwork associated with the program and make the audit process easier, cheaper, and less time consuming (especially for annual internal audits).

3.11 SECOR

SECOR holders reported that they lack the ability to devote resources, struggle to meet the requirements, and do not receive the training required to create a program that makes it easier to manage.

Recommendation 13: Consideration should be given to provide more resources to support SECOR holders, or possibly eliminate this category of COR.

3.12 Flexibility

Some COR holders spoke of the need for more flexibility, rather than trying to adopt a one-size-fits-all approach. This often means that employers end up applying a lot of creativity to address elements or paperwork that are not relevant to the work they do.

Recommendation 14: Consideration should be given to addressing the applicability of requirements to specific industries especially as to those aspects that are assessed in the audit tool. CPs could be charged with investing in and recommending how COR could be adjusted for their industry sector and subsectors.

3.13 Partnership

The program has been successful, partly because the program has been a partnership between government and business. The model has worked well in the past when the number of CPs and COR holders was small. However, change has been stifled by a model that requires consensus on every program modification.

Recommendation 15: Consideration should be given to changing the consensus model to one where a majority rules, or where PIR is given the power to impose changes that are considered essential.

3.14 New OHS Act

The implications of the new *OHS Act* are not well known to employers in Alberta. With just three months until the new Act comes into effect, most Non-COR and many COR holders are not even aware of the change. Most of those who are aware admit that they do not fully understand the implications, and a majority believe that most of these changes will have no impact on their work places.

Recommendation 16: More outreach and advertising of the implications of the new OHS Act are needed, and should be targeted both at COR and Non-COR organizations. The former need to understand what, if anything, they need to do to be compliant outside of COR.

Recommendation 17: In consultation with CPs, they could be promoted as a source of information and assistance for meeting the new legislation.

Recommendation 18: COR should incorporate the elements of the Act not already covered, and COR could then be promoted as a method to meet the requirements of the Act.

3.15 Recommendations: 2018 and 2003

Several of the recommendations made in 2018 are similar to those made in 2003, the last time an evaluation of the program was conducted. Table 1 shows these similarities. While not all the recommendations are the same, they do demonstrate that some common themes have persisted over time.

Theme	Recommendations	
	2018	2003
Need for COR	The COR program provides value and should continue.	Overall, workplace health and safety in the province was considered very important and all respondents agreed that strategies to address injuries and illness were paramount. Partnerships was viewed as a unique and highly effective program to foster and monitor improvements in workplace safety. Satisfaction with the Program is high and the Partnerships staff should be commended for their efforts.
What should COR be?	Consider adapting COR so that there are different levels within the program. The current elements (plus any new elements that will be added to meet the requirements of the new Act) could be an entry level or basic version, while COR Plus (or some other name) would indicate that a higher standard has been achieved and is being maintained	Consideration should be given to what companies can do to improve their safety practices beyond obtaining and maintaining a COR.
Prevention	PIR should consult and work with other stakeholders to develop a strategy whereby all are helping to identify and assist employers that are performing poorly. The focus should be on prevention with the program being more proactive rather than reactive to triggers.	There is support for putting resources towards prevention of workplace injury. Specifically, random checks conducted by OH&S enforcement officers were considered a valuable component of the workplace health strategy (and there is a need for additional officers). There is also a significant role played by safety and industry associations in the promotion of workplace safety and Partnerships staff should work with these groups to disseminate information and strategies to their members. Finally, there is a need to develop a program on workplace safety to be incorporated into the school curriculum and expand the emphasis on training in apprenticeship training.
Mandatory	Consider making COR mandatory for all high-risk industries.	While there is support for making COR mandatory, the Department must ensure cost of this strategy outweighs the benefits (given that many small employers already have good safety records).
Partners	More should be done to promote (and explain) the role and responsibility of	More efforts to recognize Partners should be made, including promotion of

Table 1: Similar recommendation made in 2018 and 2003 evaluations

Theme	Recommendations	
	2018	2003
	Partners in Health and Safety. As ambassadors for workplace health and safety, they should have consistent and clear roles and responsibilities.	the names at conferences, industry events and in general advertising. Program Partners should also play a larger role in the Program and should be encouraged to provide mentoring support to COR holders in their industry.
Paperwork	Reduce the amount of paperwork associated with the program and make the audit process easier, cheaper, and less time consuming (especially for annual internal audits).	Reducing the amount of paperwork associated with the Program.
Audit process	Reduce the amount of paperwork associated with the program and make the audit process easier, cheaper, and less time consuming (especially for annual internal audits).	Making the audit process easier, cheaper and less time consuming. One strategy is to consider reducing the effort required for annual internal audits (e.g. have a simplified version for the internal years or design a computerized program to assist in data collection and report preparation).
Small employers	Consideration should be given to provide more resources to support SECOR holders, or possibly eliminate this category of COR.	Revisiting and possibly simplifying the requirements for small businesses to obtain a COR.