



ACTION PLAN PROGRAM

Effective Date: September 10, 2021

Owned by: Juliet Goodwin
Manager, Safety Audits & Certifications

Approval: 

Approved By: Juliet Goodwin
Manager, Safety Audits & Certifications

Valid Until: September 10, 2024

Sensitivity Level: Public


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SUMMARY OF CHANGES

This Summary shows:

- All changes from last approved and published document
- The location within the document where the changes have been made

Version	Date	Author(s)	Revision Notes
1.0	January 1, 2019	Melissa Mass	This is the first revision of the Action Plan Procedure. This revision brings the Procedure template into alignment with the templates used by the Governing Documents Framework.
1.1	December 18, 2019	Melissa Mass	Revisions made to incorporate use of Scoring Guide and updates to document numbers.
1.2	September 10, 2021	Juliet Goodwin	3 Year Review

 Requirements changed in the new revision will be identified with a revision triangle beside it.

SUMMARY OF REVIEWERS

The following people were involved in the review of this Procedure.

Name	Position
Juliet Goodwin	Manager, Safety Audits and Certifications
SA&C Team	Subject Matter Experts (SME)

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1.0 ABOUT THIS PROCEDURE

1.1 Purpose and Direction

An employer may request approval from Energy Safety Canada to use an Action Plan in lieu of conducting a maintenance audit to maintain their COR, provided the company meets the necessary requirements. In some cases, employers may find it more valuable to focus their resources on implementing Action Plan items rather than conducting annual maintenance audits. Action Plans are designed to introduce measurable and meaningful improvements to the employer's occupational health and safety (OHS) management system.

1.2 Scope

This plan outlines the criteria and approval process for use of Action Plans, which may be performed in lieu of a maintenance audit for companies that meet the prerequisites and have received written approval from Energy Safety Canada based on their application and proposed Action Plan. Action Plans in lieu of Certificate of Recognition (COR) maintenance audits may not be accepted in all jurisdictions.

Small Employer Certificate of Recognition (SECOR) are not eligible for Action Plans.

1.3 Target Audience

The target audience for this document is all Energy Safety Canada personnel and third parties involved in the COR program any work location. This includes Employers, Auditors, and applicable governing bodies.

2.0 PROCEDURE

2.1 Employer Eligibility Criteria

To be eligible for Action Plans, an employer must meet all the following criteria:

- The employer must have a current, regular COR.
- The employer must be in a maintenance year and have completed one full, three-year COR audit cycle.
- The employer must obtain written approval from Energy Safety Canada to use an Action Plan.
- The employer must submit a written application to Energy Safety Canada by January 31 of the calendar year in which the maintenance audit is required.



In situations where the employer completes a certification audit each year, eligibility for an Action Plan is after three certification audits have been completed.

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- The last certification audit must have achieved 85% or higher as an overall score or, if applicable, achieved an 80% or higher in the previous year's Action Plan.



2.2 Action Plan Proposal Requirements

The Action Plan must include:

- A list of unimplemented audit recommendations from the last audit, which will be used to develop five to 10 accompanying objectives. Objectives are the corrective action “projects” and the desired outcomes for completing them. Corporate health and safety initiatives may be included as part of the Action Plan.
- At least two, but no more than five milestones (per objective). Milestones are the steps taken to achieve the objective for each project. Each milestone must include a target date and the assigned person(s). A description of the proposed deliverables for each milestone that will be submitted to Energy Safety Canada as evidence of completion.
- Assignment of weighting for each of the milestones should be based on the Action Plan Scoring Guide included in the [Action Plan Proposal Guidance document](#). This should include a total of 100 points for all objectives combined for each year of the Action Plan. This allows Energy Safety Canada to determine the percentage completeness of the Action Plan.
- The employer must submit the Action Plan using the approved [submission form](#) to Energy Safety Canada by March 31 of the calendar year in which the maintenance audit is required.

2.2.1 Action Plan items must be measurable and introduce meaningful improvements to the employer's occupational health and safety management system.

2.2.2 Energy Safety Canada's approval of the proposed plan is contingent on whether the recommendations from the last audit have been adequately addressed and whether the deliverables can provide sufficient evidence of completion.

2.2.3 Large employers with multiple sites, accounts, and/or related employers originally included together in the same certification audit must submit separate Action Plan proposals for each of their sites, accounts, or related employers.

- The proposed Actions Plans must cover the same scope of operations as would be included if the employer was submitting one regular Action Plan. For example, if one of the submitted Actions Plans did not meet the scope of operations, the other Action Plans would not receive approval until revised.
- This process requires prior approval from Energy Safety Canada.

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2.3 Action Plan Completion

2.3.1 The Action Plan must be submitted using the Action Plan Submission form. All relevant portions of the applicable form must be completed. The Action Plan Submission Guidance document provides instructions to assist with the completion of the form.



- The employer must actively pursue completion of Action Plan items throughout the year.
- The employer may submit an amended Action Plan to Energy Safety Canada during the calendar year. Amendments must be submitted by October 31 for Energy Safety Canada to approve the changes.
- The employer must submit the completed Action Plan, together with documentation providing evidence of the completion of the project deliverables, to Energy Safety Canada by November 30 of the maintenance year.

2.3.2 Deliverables must be directly relevant to the action items they are designed to verify.

- Documentation submitted to verify completion must be complete and organized.
- The employer must include a current organizational chart and company profile.

2.4 Action Plan Review and Scoring

2.4.1 Energy Safety Canada will review the employer's completed submission and assign a score relative to its completeness of the deliverables.

2.4.2 Action Plans for each calendar year must achieve a score of at least 60% to meet COR maintenance requirements. If 60% is not achieved then the company will be required to complete a regular COR maintenance audit, with the last day of data collection being no later than December 31 of that year.

2.4.3 Actions Plans that score 80% or higher in their first maintenance year will be eligible to conduct an Action Plan for their second maintenance year. Employers that score less than 80% must revert to Energy Safety Canada's audit protocol for the second year.

2.4.4 Employers who submit multiple Action Plans must achieve a combined final score of at least 60% on the weighted average to maintain their certificate.

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- 2.4.5 Employers who submit multiple Action Plans must achieve a combined score of 80% based on the weighted average of all the Action Plans for the year. The weighting of each Action Plan will be based on the number of employees covered by the individual plan, compared to the total number of employees covered by all Action Plans. The weighting will be calculated by Energy Safety Canada as part of the review.
- 2.4.6 Should the documentation submitted be less than 80% completion of the Action Plan items or the review score be less than the self-scoring, Energy Safety Canada will notify the employer in writing, stating the deficiencies and the specific consequences of the score achieved.
- If the employer believes they have other documents that would demonstrate the projects were completed, the employer must contact Energy Safety Canada to request permission to submit additional documents. Documentation dated after November 30 will not be accepted.
 - If Energy Safety Canada agrees to review additional documents, the employer will have five days to submit them.
- 2.4.7 The Action Plan and deliverables will be maintained on file by Energy Safety Canada until the employer's subsequent maintenance option/audit report is received and approved. Where deliverables were confidential to the employer or provided through temporary access to an employer's systems, reviewer notes describing how the action items were met must be maintained for the same period.

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3.0 ROLES & RESPONSIBILITIES FOR PROCEDURE

<p>Employer</p>	<ul style="list-style-type: none"> • Ensures Action Plan includes recommendations from previous COR audits, where applicable • Action Plan may also include corporate health and safety initiatives that are outside the scope of the COR audit • Completes the Action Plan application form and submits to Energy Safety Canada for approval no later than January 31 of the current year • Approved employers must submit their proposed Action Plan objectives by March 31 of the same year for approval • Submits any amendments to the Action Plan by October 31 • Submits a completed Action Plan, with supporting documents, by November 30 • Submits any revisions or supporting documents by December 31, after the quality assurance (QA) review by Energy Safety Canada
<p>Energy Safety Canada</p>	<ul style="list-style-type: none"> • Reviews Action Plan application to determine approval • Reviews proposed Action Plan with objectives for approval • Reviews any proposed amendments to Action Plan for approval • Performs a QA review on completed Action Plan • Returns completed Action Plan for revisions and performs QA review on revised Action Plan • Advises employers who fail to meet the quality standards or the minimum 80% score that they are not eligible for Action Plans the following year

4.0 REFERENCE DOCUMENTS

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