

HR Audit Results

HR Threats

The following are areas where *Redacted* should focus in order to ensure legislative compliance.

Accessibility

At present, *Redacted* is not in compliance with the Accessibility for Ontarians with Disabilities Act (2005, S.O. 2005, c. 11). This legislation mandates that all employers in Ontario provide accessible customer service, develop accessibility policies, train employees, file compliance reports, and take steps toward making their workplaces more accessible.

Risk: High

While the Ministry of Community and Social Services is responsible for enforcing compliance, there is no mechanism within the AODA regime for an individual to initiate an AODA complaint against an organization. However, if the Ministry does identify compliance gaps, administrative penalties range from \$500 to \$100,000 for non-compliance and failure to file reports.

Timeframe for compliance: June 30, 2017

Reference: <https://www.ontario.ca/page/accessibility-rules-businesses-and-non-profits>

Pay Equity

Currently, *Redacted* is not in compliance with the Pay Equity Act (R.S.O. 1990, c. P.7). This legislation requires employers to identify and correct gender discrimination that may be present in their compensation practices. They must also adjust the wages of employees in female job classes so that they are at least equal to the wages of employees in male job classes if they are found to be comparable in value based on skill, effort, responsibility and working conditions.

Risk: Minimal

Intervention by the Pay Equity Commission is typically complaint-driven, and timeframes for compliance are relatively lax. However, there are financial penalties for employers who interfere with the investigation of a pay equity complaint, or who intimidate or discriminate against anyone exercising their rights under the Pay Equity Act.

As the company has only been in business for two and a half years, any retroactive assessments would be minimal.

Proposed timeframe for compliance: December 31, 2017

Reference: http://www.payequity.gov.on.ca/en/tools/Pages/guide_to_act4.aspx

Bill 132

Redacted has recently taken steps to ensure compliance with Bill 132's amendments to the Occupational Health and Safety Act (subsection 32) which include revising our policy to include the updated definition of "workplace harassment" and detailing investigation procedures. The JHSC has approved the revised policy, and training will be scheduled for all employees.

Reference: <https://www.labour.gov.on.ca/english/hs/topics/workplaceviolence.php>

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WHMIS 2015

During the transition from WHMIS 1998 to WHMIS 2015, employers are required to comply with and train their employees on both systems. Training resources are currently being reviewed in order to update *Redacted's* training. All employees will require retraining.

References: https://www.labour.gov.on.ca/english/hs/pubs/whmis/whmis_2.php
<http://www.wsps.ca/Information-Resources/Topics/WHMIS-2015.aspx>

Privacy

The Personal Information Protection and Electronic Documents Act (SC 2000, c 5) require that organizations obtain consent when they collect, use or disclose an individual's personal information and have formalized personal information policies. While *Redacted* does allude to privacy concerns in the IT policies, a formal privacy policy detailing appropriate use of personal information is recommended.

Reference: https://www.priv.gc.ca/en/privacy-topics/privacy-at-work/02_05_d_17/

Salary Overtime Pay

It is recommended that *Redacted* monitor the amount of overtime worked by non-supervisory salaried employees, as some of them may qualify for overtime pay.

A fixed salary compensates an employee for all non-overtime hours up to and including 44 hours a week. After 44 hours, the employee is entitled to overtime pay. If employees work more than 44 hours in a week, they *may* agree in *writing* to receive paid time off work instead of overtime pay. However, if an employee has agreed to bank overtime hours, they must be given 1½ hours of paid time off work for each hour of overtime worked.

Investigations by the ESA division of the MOL are complaint-driven, however, retro pay may be ordered in cases where employees should be entitled to overtime pay.

Reference: <https://www.labour.gov.on.ca/english/es/pubs/guide/overtime.php>

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HR Opportunities

The following are a list of ideas aimed at improving the current HR systems and better positioning *Redacted* as an employer of choice.

Staffing

- Develop a formalized succession planning process
- Develop formalized training/development plans for key individuals
- Consider job rotation for management personnel
- Consider allowing flexible work arrangements (e.g. work from home during inclement weather)
- Develop a career page on the website (in progress)
- Circulate organizational announcements for all new hires (in progress)
- Evaluate the ROI of various recruitment sources - advertising/recruitment agencies (in progress)
- Expand current advertising avenues - Indeed, job fairs, marketing opportunities (in progress)
- Conduct exit interviews with employees who are departing voluntarily
- Investigate transportation to/from Devonshire mall

Compensation and Benefits

- Consider distributing total compensation statements annually
- Consider offering a referral bonus to employees who recommend a candidate that is subsequently hired
- Confirm strategy for positioning pay (lead, lag, match)
- Determine how often salary surveys should be conducted

Health and Safety

- Implement a Near-Miss reporting procedure (in progress)
- Implement a workplace wellness program - health promotion activities, wellness committee, info boards, contests
- Review WSIB's Workwell audit template to ensure compliance
- Consider providing a safety tour during new employee orientation
- Formalize the Return to Work policy and have a list of available modified jobs
- JHSC certification transferred from Heinz to HCC
- Lockout training
- TDG training
- First aid training
- Confined space training

Employee and Labor Relations

- Consider implementing an employee engagement survey
- Institute a social committee and/or plan more frequent opportunities for employee social interaction
- Publicize corporate social responsibility initiatives (sponsorship activities)
- Institute an employee suggestion/kaizen system

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- Regular town hall meetings
- TPT program
- Factory canteen

Human Resource Development

- HR Vision/Strategy
- Develop a formalized annual training plan for the facility
- Develop a video to be used in the new employee orientation where senior leadership welcomes employees to the company
- Spruce up the new employee orientation program
- Review the annual evaluation process – is it effective? Should it be more structured/formalized? Should it consist of more frequent “coaching” sessions?
- Ensure all new hires provide verification of educational background
- Develop a 30/60/90-day training and follow-up plan for all new employees
- Circulate leadership articles to management/supervision to promote personal development
- Offer lunch and learn sessions on management topics
- Supervisory training – time management, dealing with stress, conflict management

HR Compliance

- Conduct a formalized HR audit on an annual basis
- Update employee manual and employee sign-off (in progress)
- Consider implementing an Employee Code of Conduct
- Update and roll-out attendance policy (in progress)
- Update the vacation policy (in progress)
- Develop a policy to address medical marijuana use and substance abuse
- Develop more detailed HR procedures - process flow charts, training manuals for the training database
- Report on additional HR metrics: injury trends, attendance, turnover, training hours, frequency, severity, time to hire, cost to hire