



ALBERTA SOCIETY OF HEALTH AND SAFETY PROFESSIONALS

Stakeholder consultation package for the establishment of a professional regulatory association for the practice of occupational health and safety in Alberta.



PURPOSE

The Alberta Society of Health and Safety Professionals ([ASHSP](#)) is a registered Alberta Society seeking to have the practice of occupational health and safety (OHS) recognized as a full Profession in Alberta, complete with legally protected title and scope of practice protection, and a Professional Regulatory Organization (PRO) to provide oversight and regulation of this field of practice.

The ASHSP will be making application to the Government of Alberta in 2024, initiating the formal review and approval process for the creation of the PRO and the creation of legislation regulating the practice of Occupational Health and Safety (Currently two streams; Occupational Hygiene (OH) and Occupational Safety (OS)) in Alberta. A key step in this process is consultation with stakeholders that may be affected by this initiative.

Initial, informal consultation with Alberta stakeholders showed strong support for the idea of professional regulation of the Occupational Health and Safety Profession. Ongoing consultation has been occurring with national organizations with respect to their role in a true professional regulatory framework not only in Alberta, but throughout Canada. This document initiates the formal consultation stage of the process towards application.

You are receiving this consultation package as an identified stakeholder, and your feedback is requested.

Key elements of professional regulation and the future Professional Regulatory Organization are presented below, and specific questions are identified. Responses may be provided at the following:

[See link in Email to Survey Monkey](#)

Please provide responses by January 31, 2024.

Contact feedback@ashsp.ca with questions, or concerns.

This survey is being widely distributed to get broad representation of stakeholder groups. Stakeholders include a cross section of employers, industry associations, worker associations, certifying partners, existing professional regulatory organizations, Government of Alberta ministries, educational institutions, practitioners in the field of OH and OS, and certain national organizations providing Occupational Hygiene (OH) and Occupational Safety (OS) certification.

Where a company employs an OH and OS practitioner, the practitioner may also provide their own response; however, the organization's response is still desired.



Feedback will be compiled and reviewed so that additional information from stakeholders can be incorporated in the application to the Government of Alberta. The ASHSP may follow-up if clarification is needed.



CURRENT STATE

The ASHSP believes change is needed. The current state of the practice of Occupational Health and Safety (Occupational Hygiene (OH) and Occupational Safety (OS)) in Alberta has serious problems negatively affecting employers, workers, the public, and government. These problems include the following:

- Currently in the field of Occupational Health and Safety there is no legally protected title or scope of practice protection. This means ANYONE may call themselves an ‘Occupational Health and Safety Professional’ and provide professional-level advice to employers and workers, even though the person may not have the education, experience, competency, capability or professional ethics to do so. This is a significant risk to employers and workers alike.
- People practice outside the scope of their competency/capability and provide incomplete and incorrect services and information to employers; information employers rely on to make decisions affecting health and safety. This not only increases cost, legal liability, and reputational risk for employers, it also significantly increases the risk of injury, illness, property damage, and other forms of loss.
- While some recognized certifications are provided through national organizations, these certifications are voluntary, meaning a person does not require the certification to work in the field of Occupational Health and Safety. Further, these national organizations cannot regulate a profession under law, as such a law must be a provincial Act or Regulation¹.
- There is confusion over the ever-growing multitude of certifications and designations, and what these certifications confer upon the holder. Employers and practitioners alike may be unsure what certification is appropriate for a given task, and many people practicing in the field of health and safety include inappropriate or invalid designatory letters after their name. At best this is misleading, even if well-intentioned.
- Currently there is little recourse to address incompetent or unethical practice. It’s a ‘buyer beware’ state, where incompetent or unethical practice is only wrong if the provider is caught by a government OHS Officer. National organizations may only prevent a person from using titles protected under trademark law (as opposed to regulatory prosecution for someone fraudulently using a legally-protected title like engineer or lawyer) but cannot enforce scope of practice requirements (i.e., that only someone who holds a title can perform certain high-risk health and safety work) or address a person who does not voluntarily belong to the organization.

¹ [Roadmap to a Profession](#), Greene, McEnhill, January 1, 2018, p.3



FUTURE STATE

The ASHSP believes the practice of Occupational Health and Safety, specifically OH and OS, needs to be elevated to a full, legally recognized Profession, much like other recognized professions including engineering, health professionals, lawyers, agrologists, forestry professionals, and many more.

The sole reason for Professional regulation is to protect the public interest and the interest of public safety by safeguarding

- **life, health, and the environment, and**
- **the property and economic interests of the public**

There are clear benefits of Professional regulation:

- Accountability – accountability to the public, employers, peers, and government to ensure effective and efficient services are provided by those with the appropriate competency, capability, education, experience, and professional ethics.
- Professional Regulatory Organization – provide oversight of the profession to protect the public interest, and to provide formal recourse to address incompetent or unethical practice.
- Transparency – a PRO must report to the Government and the public with respect to complaints, investigations, and disciplinary action against those against whom complaints have been made.
- Mandatory registration - for those wishing to practice in certain areas of OH and OS that have scope of practice protection.
- Title protection – clearly defined and well-understood titles, protected by law.
- Scope of practice protection – clearly defined scope of practice protection to ensure those practicing in certain areas of OH/OS possess appropriate competency, capability, education, experience, and professional ethics.

Simply put, Professional regulation of the field of OH/OS will ensure those practicing in this field possess the appropriate levels of competency, capability, education, experience and professional ethics necessary to ensure effective and cost-efficient services/products to employers, protection of workers, and protection of the public.



PROFESSIONAL REGULATORY ORGANIZATION

The ASHSP will be applying to the Government of Alberta in 2024, seeking the establishment of a Professional Regulatory Organization (PRO) and the creation of provincial legislation governing the practice of Occupational Health and Safety (Currently two streams; Occupational Hygiene (OH) and Occupational Safety (OS)) in Alberta.

Some key elements of the future PRO must involve government and will therefore be addressed as the approval process progresses; however, key ideas are presented below for your feedback. **NOTE:** these items are subject to change based on the results of stakeholder feedback and the government approval process.

PRO name

- The final name of the organization is to be determined but will follow current naming convention and nomenclature.
- Example of a possible name is: the *Alberta Institute of Occupational Health and Safety Professionals*

Legislative authority

- The Government of Alberta will determine the most appropriate legislative framework, which will depend on the future of proposed legislation. Three options include:
 - A Regulation written under the *Professional and Occupational Associations Registration Act (POARA)*.
 - Independent legislation via a stand-alone act, which might be called the *Regulated Occupational Health and Safety Professions Act*, or similar.
 - Inclusion in the future *Professional Governance Act*. If and when this Act is enacted in Alberta, this is the most likely option for the future OHS PRO.

Accountability

- As with all existing Alberta PROs, the Occupational Health and Safety PRO will be accountable to the public and the Government of Alberta.
- The organization will prepare and submit an annual report to the Minister and will publish the report so it is available to the public.
- A directory of the organization's officials and contact information will be made available to the public through the organization's website.
- A member-status verification tool will be provided for validation by employers, the public, or other stakeholders.
- All information will be managed in accordance with applicable legislation, including the *Freedom of Information and Protection of Privacy Act* and the *Personal Information Protection Act*.



Professional conduct, ethics, and practice standards

- The organization has drafted rules for professional conduct, a code of ethics, and practice standards as required under legislation.
- Formal processes to address competency, professional, or ethical breaches have been drafted in alignment with the requirements of legislation and the processes used by existing PROs.

Board

- The Board will consist of the following positions; however, it should be noted additional positions may be added to represent sub-disciplines that may be included under the future legislation.
 - President
 - Past President
 - Vice President
 - Treasurer
 - Secretary
 - Registrar
 - OHS Generalist board member(s) – number to be determined
 - Occupational Hygiene Board member(s) – number to be determined
 - Public Member(s) – number to be selected in accordance with legislated requirements
- In addition to the positions above, the organization will have full-time staff consisting of an Executive Director and administrative support.

Committees

- The organization will establish the following committees to carry out the organization's mandate:
 - Practice Review Committee – for safety generalist and occupational hygiene streams.
 - Registration Committee
 - Disciplinary Committee – procedures will follow legislated requirements and will align with standard practices followed by existing PROs.
 - Other committees are required under legislation or to further the business of the PRO.

Bylaws and procedures

- The organization will establish bylaws in accordance with applicable legislation, similar to current [ASHSP bylaws](#) with any necessary changes.
- The organization will establish written procedures detailing how specific business functions are carried out in order to foster transparency and consistency.



Registration requirements

- The ASHSP proposes mandatory registration for those providing guidance, advice, and support in certain restricted scope of practice areas that require a minimum level of competency, capability, education, experience, and professional ethics.
- NOTE: registration is targeted towards those who practice in the field of health and safety providing guidance, advice, and support to employers and workers and NOT towards those who engage in health and safety simply by virtue of their role, such as with a manager, supervisor, or worker.

Protected titles

- Professional regulation will specify titles to be protected under law, only allowing members in good standing to use protected titles.
- Titles may be general in nature, such as P.Eng, or RN, or they may be specific to a particular area of practice or the level at which a person may practice.
- Specific titles may delineate between areas of practice such as an OS generalist or an occupational hygienist.
- See **Appendix 1** for proposed titles.

Scope of practice

- Scope of practice protection is needed to ensure certain high-risk work is completed by people who have the competency, capability, education, experience, and professional ethics to provide effective, appropriate advice and guidance.
- Possible areas of protected scope have been identified and will require input from stakeholders and the Government of Alberta as the application process proceeds.
- Examples of areas where scope of practice protection may apply include:
 - Professional-level areas of practice vs practitioner or technical levels.
 - Occupational hygiene vs generalist vs health areas of practice (example: noise assessment testing, vs noise control implementation vs audiometric testing).
 - See **Appendix 2** for proposed scope of practice.
- Note that while an area of practice may be restricted, a non-regulated person may still conduct the activity under the oversight of a person permitted to practice in the area, or have the completed work certified by a person permitted to practice in the area.

Labour mobility

- The establishment of an Occupational Health and Safety PRO in Alberta will not negatively affect labour mobility, as there is established legislation mandating that mobility is not unduly restricted. This includes the Canadian Constitution, the Alberta *Labour Mobility Act*, and the Alberta *Fair Registration Practices Act*.
- Where an out-of-province OH/OS practitioner is required to work in Alberta, there must be clear straightforward processes to assess the applicant and provide authorization to work in Alberta providing all required criteria are met.
- This includes international workers representing a multi-national company with operations in Alberta, as in common in the energy sector.
- As long as minimum criteria are met, labor mobility cannot be negatively affected.



Membership Categories

- The ASHSP has established membership categories for the future PRO. See **Appendix 3**.
- Membership categories include those at the professional level, practitioner level, and administrative level.
- In addition, there are categories for associate member, student/candidate members, and options for non-practicing.

Entry requirements

- Because the establishment of a professional regulatory framework in Alberta represents a new approach to health and safety in Alberta, the ASHSP proposes an inclusive approach to entry requirements to allow for a gradual adjustment period.
- As the professional regulatory framework is implemented, entry requirements may change, especially as additional educational programs may be offered to address needs (i.e. more degree programs developed and offered to support professional designations, implementation of sponsorship, mentorship, apprenticeship requirements for new applicants).
- Proposed criteria align with the requirements necessary to obtain current national designations, and equivalencies will be recognized. See **Appendix 3**.

Examination and assessment

- All applicants must undergo an assessment of their educational and experiential history, as well as an examination (knowledge, practical, or both).
- Existing certifications from recognized certification bodies may be recognized as an equivalency when applying to the PRO; however, a reasonable, additional knowledge assessment of Alberta legislation and the code of conduct/ethics may be required for those new to the province or the organization.
- The future PRO may utilize the services of a third party, such as the Board of Canadian Registered Safety Professionals and the Canadian Registration Board of Occupational Hygienists to conduct the assessment and administer the examination(s) to applicants on behalf of the PRO and based on Alberta requirements.

Membership fees

- Membership fees must account for the operational needs of the organization, including a contingency fund to manage unplanned expenses such as disciplinary hearings and/or legal fees.
- Specific member fee amounts can vary depending on the number of practicing members.
- Based on ASHSP estimations and a scan of existing PROs, member fees will likely fall into the range of \$450.00 to \$650.00 per year for practicing members.



Continuing Competency

- As with all current PROs, requirements for ongoing competency and education will be established.
- The specific requirements are under development; however, requirements will substantially align with what current PROs and national organizations require (periodic reporting, multiple ways to earn points, minimum points over time required).
- As with examination and assessment, the services of a third party, such as an existing national certification body, may be employed to manage this on behalf of the PRO.



CONSULTATION QUESTIONS

The following questions will be asked in the survey:

1. Have you or your organization experienced issues with the current state of health and safety services performed in Alberta? Feedback.
2. Do you feel professional regulation may positively affect health and safety in your organization or in Alberta in general? Feedback.
3. Does the proposed name of the future PRO raise any issues? Feedback.
4. Do you support the use of protected titles as described? Feedback.
5. Do you feel scope of practice protection, generally and as described, is warranted for the OHS profession? Feedback..
6. Do you have concerns about labour mobility (i.e., conducting work interprovincially or internationally as it relates to professional regulation? Feedback..
7. Do you have any public interest or public safety concerns with the regulation of the field of OHS? Feedback..
8. Do you support the entry requirements and assessment process as presented? Feedback.
9. Do you have concern with the membership fee range as presented? Feedback.
10. Would you support using an independent body to assess and examine applicants? Feedback.
11. Would you support a third party managing continuing competency requirements? Feedback.
12. Do you support the disciplinary process as presented? Feedback.
13. Do you feel there are other un-regulated practitioner, professional groups that should be considered for inclusion in this initiative? List & Provide Feedback.
14. Do you support the regulation of the practice of occupational health and safety in Alberta?



Appendix 1 – Proposed Protected Titles

Occupational Safety Stream	Occupational Hygiene Stream
Professional <ul style="list-style-type: none">• p.OHS• OHSP• ROHSP	Professional <ul style="list-style-type: none">• p.OH• OHP• ROHP
Practitioner, Technical <ul style="list-style-type: none">• t.OHS• OHST	Practitioner, Technical <ul style="list-style-type: none">• t.OH• OHT



Appendix 2 – Proposed Areas of Practice Protection

Note: the table below assumes the Occupational Safety (OS) or Occupational Hygiene (OH) Professional/Practitioner has appropriate training and competency in the specific task in addition to their professional level designation.

These Practice Areas were developed to align with the Government of Alberta document “Tips on Selecting an OHS Consultant” July 1, 2022.

Ref	Area of practice	Stream		Role
		OS	OH	
1	Air Quality	-	✓	Measure and improve environmental air quality.
2	Asbestos	-	✓	Inspect asbestos abatement projects; conduct air sampling.
3	Audits	✓	-	Conduct COR certification audit; Conduct ISO audit
		✓	✓	OHS program or management system audits – formal, informal, internal, or external
4	Biological and medical monitoring	-	-	*Occupational Health - Conduct biological monitoring / medical surveillance testing
		-	✓	Oversight of ongoing inspection/assessment of hazard controls
5	Chemical hazards, biological hazards, harmful substances	✓	✓	Oversight of sampling plans, data collection, interpretation of results, recommendations for worker protection; Worker exposure sampling and monitoring
		-	✓	Perform chemical exposure assessments
		-	✓	Measure and improve environmental air quality.
6	Confined Space	-	✓	Conduct/oversee air quality testing, recommendations for worker protection
		✓	✓	Monitor implementation of confined space code of practice
		-	✓	Oversight confined space codes of practice and hazard assessments.
7	Cranes, rigging and hoisting	✓*	-	Lift plans, calculations, safe rigging, and hoisting practices *may require Safety Engineering
8	Electrical Safety	-	-	*Safety Engineering - Classify areas under the Canadian Electrical Code
		✓	-	General electrical safety
9	Emergency Management	✓	✓	Emergency Preparedness and Response, emergency response planning
10	Environmental health	-	✓*	*Occupational Health professionals may also work in this area
11	Ergonomics	✓*	✓*	Design and arrange work tasks, environment, conditions, and equipment so workers can interact efficiently, comfortably, and safely. *may require Ergonomist
		✓*	✓*	Design work and layouts to prevent repetitive strain injuries and back pain. *may require Ergonomist
		✓*	✓*	Design work and layouts to prevent repetitive strain injuries and back pain. *may require Ergonomist



		✓*	✓*	Incorporate ergonomic principles into design of a product or machinery to prevent injuries. *may require Safety Engineering and/or Ergonomist
		✓*	✓*	Modifying the workplace to fit the workers (job, station, tools and environment) *may require Ergonomist
		✓*	✓*	Proper techniques to reduce injury/damage to the musculoskeletal system. *may require Ergonomist
		✓*	✓*	Workstation / office ergonomic assessments *may require Ergonomist
12	Explosives	✓	-	Oversight of process development
13	Exposure control	-	✓	Recommend ways to reduce exposure to chemical, biological, physical, or ergonomic hazards.
14	Fall protection	✓*	-	Oversight of fall protection plans *may require Safety Engineer
15	Fire and explosion hazards	✓*	✓*	Oversight of fire and explosion prevention and emergency plans *may require Safety Engineering
16	First aid	✓	-	-
17	General safety	✓	✓	-
18	Ground disturbance	✓	-	Oversight of process development, assessment procedures
19	Hazard Assessment	-	✓	Identify hazardous environmental conditions and recommend ways to prevent injury or illness to workers.
		✓	-	Identify physical hazards and recommend ways to prevent injuries.
		✓	✓	Oversee development of processes (formal, site-specific processes)
20	Hazardous Energy, Lock-Out / Tag-Out	✓	✓	Oversight of process development
21	Hazardous Materials	-	✓	Conduct hazardous materials assessment / surveys
22	Health & Safety Programs or Health & Safety Management System development	✓	✓	Development and oversight of program or management system
23	Incident investigation	✓	✓	Lead investigation, oversight on investigation report, recommendations to prevent recurrence (including serious and potentially serious incidents)
24	Indoor air quality	-	✓	Indoor air quality assessment and interpretation
25	Joint Health & Safety Committees	✓	✓	
26	Laboratory analysis	-	✓	
27	Management & Leadership	✓	✓	Mentor and review work conduct by other OH/OS staff
28	Mould	-	✓	Mould investigation, sampling, assessment, and mitigation
29	Noise & Hearing Conservation	-	-	*Occupational Health - Conduct audiometric testing
		-	✓	Hearing conservation programs, design, assessment, implementation, controls



		✓	✓	Oversight of noise reduction and hearing loss prevention program
		-	✓	Perform noise exposure assessments; conduct/oversee noise measurement, assessment and control
30	Occupational Health	✓*	✓*	Develop measures to enhance the physical, mental, and social well-being of workers and prevent work-related injuries and illnesses. *may require Occupational Health professional
31	Occupational Hygiene	-	✓	-
32	Procedure development	✓	✓	Develop procedural controls to prevent injury to workers or loss of property.
33	Radiation - Ionizing	-	✓	Conduct radiation measurements.
		✓	✓	Conduct radiation safety audits; oversight of ongoing inspection/assessment of hazard controls, certifications
		-	✓	Oversight of radiation exposure control plans; worker exposure assessments; conduct radiation dose assessments.
34	Radiation - non-ionizing	-	✓	Electromagnetic radiation
35	Respiratory Protective Equipment	✓*	✓*	Conduct fit testing. *Occupational Health professionals may also work in this area
		✓	✓	Develop and implement codes of practice
		✓	✓	Oversight of ongoing inspection/assessment of hazard controls
			✓	Select appropriate RPE; calculate RPE service life
36	Risk management	✓	✓	Risk assessment and management
37	Road safety	✓	-	-
38	SDS preparation	-	✓	-
39	Similar Exposure Groups (SEG)	-	✓	Define and assess SEG exposures and determine appropriate controls
40	Site inspection and assessment	✓	✓	-
41	Standards development	✓	✓	-
42	Toxicology	-	✓*	*Occupational Health professionals may also work in this area
43	Training	-	✓	Develop and conduct health / hygiene related training programs and course material
		✓	✓	Develop and conduct Safety related training programs and course material
		✓	-	Emergency management: train employees to deal with emergencies and disasters.
44	Transportation of Dangerous Goods (TDG)	✓	✓	
45	Ventilation systems	-	✓	
46	Violence and harassment	✓	-	Develop and review violence and harassment prevention and mitigation programs.
47	WCB	✓*	-	Advise on Workers' Compensation Board claims involving disability case



				management and return-to-work programs, as well as claims not related to work. *may require Occupational Health professional
		✓*	-	WCB claims management. *may require Occupational Health professional
48	WHMIS	✓	✓	Workplace Hazardous Materials Information System



Appendix 3 – Proposed Entry Requirements

Table 1 – Occupational Safety Stream

Parentheses denote proposed equivalencies.

Membership Category (example)		Educational Requirement	Experiential Requirement (minimum)	Competency and Capability Requirement
Professional (e.g., CRSP)		a.) Existing CRSP (or equivalent) in good standing b.) 4+ year degree in OHS c.) Any 4+ year degree, plus an OHS certificate d.) OHS Diploma	a.) No additional requirement b.) 2 years c.) 4 years d.) 6 years	a.) Jurisdiction-specific exam, scenario-based evaluation. b-d): Jurisdiction-specific exam, scenario-based evaluation, plus generalist exam.
General Practitioner (e.g., CRST, CHSC)		a.) CRST, CHSC (or equivalent) in good standing b.) 4+ year degree in OHS c.) Any 4+ year degree, plus an OHS certificate d.) OHS Diploma e.) OHS Certificate	a.) No additional requirement b.) 1 years c.) 2 years d.) 3 years e.) 4 years	a.) Jurisdiction-specific exam, scenario-based evaluation. b-d): Jurisdiction-specific exam, scenario-based evaluation, plus generalist exam.
Field Practitioner (e.g., NCSO, MSO, CTSP)		a.) NCSO, CTSP, CHSMSA, MSO (or equivalent) in good standing b.) OHS Certificate and required courses specified by a designating issuing body c.) OHS Certificate d.) Required courses specified by a designating issuing body	a.) No additional requirement b.) 1 year c.) 2 years d.) 3 years	Jurisdiction exam, general exam or equivalent
Administrator / Candidate (e.g.; HSA, QSR, CTSC)		Required courses specified by a designating issuing body	None	Jurisdiction exam
Student		Registered in an OHS program	None	None
OHS	Occupational Health and Safety	MSO	Manufacturing Safety Officer	
CRSP	Canadian Registered Safety Professional	CTSP	Certified Transportation Safety Professional	
CHSC	Certified Health and Safety Consultant	CTSC	Certified Transportation Safety Coordinator	
CRST	Canadian Registered Safety Technician	HSA	Health and Safety Administrator	
NCSO	National Construction Safety Officer	QSR	Qualified Safety Representative	



Table 2 – Occupational Hygiene Stream

Parentheses denote proposed equivalencies.

Membership Category (example)	Educational Requirement	Experiential Requirement (minimum)	Competency and Capability Requirement
Professional	ROH or CIH designation in good standing	No additional experience required	IOHA recognized certification scheme through the NAR program, and 2 written references
	PhD in occupational hygiene or equivalent; or	2 years	
	PhD in related sciences or engineering; or	3 years	
	Master’s degree in occupational hygiene or equivalent; or	3 years	
	Master’s degree in related sciences or engineering; or	4 years	
	Bachelor’s degree in occupational hygiene, related sciences, or engineering.	5 years	
Practitioner Member OH	ROHT or LFOH designation in good standing	No additional experience required	IOHA recognized certification scheme through the NAR program, and 2 written references
	Bachelor’s degree in occupational hygiene or related sciences or engineering; or	3 years	
	College occupational hygiene technology diploma; or	3 years	
	College diploma in a related science or engineering field	4 years	
Candidate member (enrolled in, or completed)	Bachelor’s degree in occupational hygiene or related sciences or engineering, or	n/a	Letter of ambition, proof of registration, one written reference
	College occupational hygiene technology certificate or diploma, or	n/a	
	College certificate or diploma in a related science or engineering field	n/a	
IOHA	International Occupational Hygiene Association	NAR	National Accreditation Recognition
ROH	Registered Occupational Hygienist	ROHT	Registered Occupational Hygiene Technologist
CIH	Certified Industrial Hygienist	LFOH	Licentiate Member of the (British Occupational Hygiene Society) Faculty of Occupational Hygiene