



**TOWARDS  
SUSTAINABLE  
MINING**

---

# TSM ASSESSMENT PROTOCOL

A Tool for Assessing Safe, Healthy, and Respectful Workplaces Performance

## PURPOSE

The purpose of the assessment protocol is to provide guidance to facilities in completing their evaluation of safe, healthy, and respectful workplace performance against TSM indicators. This protocol supports implementation of the *TSM Safe, Healthy, and Respectful Workplaces Framework*.

As with any assessment of a management system, professional judgment is required in assessing the degree of implementation of a system or indicator and the quality of management processes and intervention. Application of this protocol will, therefore, require a level of expertise in auditing and systems assessment and knowledge of and experience in safety, health, and respectful workplace management systems and practices. This assessment protocol gauges the level of implementation of proactive safe, healthy, and respectful practices as part of TSM. It is not, of itself, a guarantee of the effectiveness of safe, healthy, and respectful activities. The protocol does not represent compliance with any legal requirements in the workplace

## PERFORMANCE INDICATORS

The Safe, Healthy, and Respectful Workplaces Protocol contains six indicators:

1. [Commitments and Accountability](#)
2. [Safety and Health Management Systems](#)
3. [Psychological Safety and Respectful Behaviour](#)
4. [Training, Behaviour, and Culture](#)
5. [Monitoring and Reporting](#)
6. [Physical Safety and Health Performance](#)

This protocol maintains a strong focus on best practices for managing physical safety and health and introduces reinforcing requirements related to psychological safety and respectful behaviour, as well as targeted revisions to integrate psychological health and safety considerations in existing health and safety management systems. Revisions were made to the framework and throughout the protocol (including a new indicator) to support companies in improving their performance in these areas. Ultimately, the aim will be to fully integrate psychological safety and health across the industry's systems for managing safety and health.

This protocol is closely linked to the *TSM Equitable, Diverse, and Inclusive Workplaces Protocol*, which includes a requirement for a corporate strategy on equity, diversity, and inclusion, as well as facility-level requirements to foster a workplace culture of equity, diversity, and inclusion. New requirements related to psychological safety and respect in the TSM Safe, Healthy, and Respectful Workplaces Protocol serve as an important basis for the achievement of equity, diversity, and inclusion—and vice versa. Companies will likely need to engage internal subject matter experts across safety, human resources, and other business areas to ensure a collaborative approach to implementation of both protocols.

## Indicator 1: Commitments and Accountability

### PURPOSE

To confirm that the facility has established clear accountability for safety, health, and respectful workplace management and performance, and that safety, health, and respectful workplace commitments have been established and clearly communicated to employees, contractors, and suppliers.

### ASSESSMENT CRITERIA :

LEVEL	CRITERIA
<b>C</b>	The facility does not meet all Level B criteria.
<b>B</b>	<ol style="list-style-type: none"> <li>1. A demonstrated commitment to safe, healthy, and respectful workplaces is evident.</li> <li>2. One or more senior management representatives are accountable for safe, healthy, and respectful workplaces.</li> <li>3. The facility has developed an action plan to meet all Level A requirements.</li> </ol>
<b>A</b>	<ol style="list-style-type: none"> <li>1. There is a demonstrated senior management commitment to safe, healthy, and respectful workplaces consistent with the intent of the TSM Safe, Healthy, and Respectful Workplaces Framework.</li> <li>2. There is a process in place to ensure that employees, contractors, and suppliers who work at the facility are aware of the company's safe, healthy and respectful workplaces commitments.</li> <li>3. Management and employee accountabilities and responsibilities are understood at all levels.</li> </ol>
<b>AA</b>	<ol style="list-style-type: none"> <li>1. An internal audit has been conducted to determine:               <ol style="list-style-type: none"> <li>a. The degree of consistency with which the commitments are applied with respect to the intent of the TSM Safe, Healthy, and Respectful Workplaces Framework.</li> <li>b. Whether accountabilities and responsibilities are understood by management and employees.</li> <li>c. Whether the commitments have been communicated to employees, contractors, and suppliers at the facility, and processes are in place to ensure their awareness of these commitments.</li> </ol> </li> <li>2. Employees at the facility demonstrate their commitment to safe, healthy, and respectful workplaces.</li> </ol>

<b>AAA</b>	<p>1. An external audit has been conducted to determine:</p> <ul style="list-style-type: none"> <li>a. The degree of consistency that the commitments are applied with respect to the intent of the TSM Safe, Healthy, and Respectful Workplaces.</li> <li>b. Whether accountabilities and responsibilities are understood by management and employees.</li> <li>c. Whether the commitments have been communicated to employees, contractors, and suppliers at the facility.</li> <li>d. The effectiveness of the process in place to ensure that employees, contractors, and suppliers who work at the facility are aware of the commitments.</li> </ul>
------------	---

**FAQS: COMMITMENTS AND ACCOUNTABILITY**

#	FAQ
1	What is a “workplace”?
2	What is a “respectful workplace”?
3	What is “senior management”?
4	What is “accountability”?
5	What does “responsibility” mean?
24	Can corporate documentation be used to demonstrate facility-level commitment?
25	How can a facility determine if safety and health commitments are consistent with the TSM Safe, Healthy, and Respectful Workplaces Framework?
26	How can employees demonstrate their commitment to safe, healthy, and respectful workplaces?
42	What is an “audit”?
43	Can a company or facility achieve a Level AAA on satisfactory completion of an external audit, without having completed a Level AA internal audit?
44	What is the validity period for internal and external audits?

## Indicator 2: Safety and Health Management Systems

### PURPOSE

To confirm that processes have been established to effectively plan for and manage safety and health controls and to prevent the occurrence of incidents. This indicator acknowledges that safety and health is a shared responsibility, and that hazard identification, risk assessment and the establishment of effective controls are integral to an effective management system. While this indicator focuses primarily on physical safety and health, some requirements also relate to psychological health and safety.

### ASSESSMENT CRITERIA :

LEVEL	CRITERIA
<b>C</b>	The facility does not meet all Level B criteria.
<b>B</b>	<ol style="list-style-type: none"> <li>1. Some physical safety and health management systems elements are established, including a clear incident notification and investigation process.</li> <li>2. Risk control tools are identified and available.</li> <li>3. The facility has identified the most common tasks.</li> <li>4. Standard operating procedures and safe work practices are in place for the facility's most common tasks.</li> <li>5. The facility has developed an action plan to meet all Level A requirements.</li> </ol>
<b>A</b>	<ol style="list-style-type: none"> <li>1. A documented physical safety and health management system is established, implemented, and maintained. At a minimum, it incorporates:               <ol style="list-style-type: none"> <li>a. Objectives and targets, with supporting plans to achieve them.</li> <li>b. Hazard identification, risk assessment (HIRA) and control processes.</li> <li>c. Identification of high consequence hazards and related critical controls.</li> <li>d. An industrial hygiene program.</li> <li>e. Defined roles and responsibilities for physical safety and health management.</li> <li>f. Workplace inspections.</li> <li>g. Maintenance of physical safety and health records.</li> </ol> </li> <li>2. Resources are assigned to establish, implement, maintain, and improve the physical safety and health management system and validate effectiveness of controls.</li> </ol>
<b>AA</b>	<ol style="list-style-type: none"> <li>1. An internal audit has been conducted to determine whether planning and implementation of the physical safety and health management system meets the requirements of Level A.</li> <li>2. Industrial hygiene risks and controls have been reviewed by a qualified hygienist.</li> </ol>

	<p>3. The facility has verified that critical controls are in place and functioning, and the definition differentiates between critical, mitigating, and underpinning controls.</p> <p>4. The facility has identified psychosocial hazards and harmful behaviours, and potential risks are assessed, managed, and monitored.</p>
<b>AAA</b>	<p>1. An external audit has been conducted to determine whether planning and implementation of the physical safety and health management system meets the requirements of Level A.</p> <p>2. An industrial hygiene program is subject to the oversight of a qualified hygienist.</p> <p>3. Facility-specific and especially hazardous tasks have been identified, and critical controls for those tasks have been identified through an established controls identification methodology (e.g., bowtie analysis).</p>

## FAQs: Safety and Health Management Systems

#	FAQ
<b>6</b>	What is hazard identification and risk assessment (HIRA)?
<b>7</b>	What is a “control”?
<b>8</b>	What is a qualified hygienist?
<b>9</b>	What is “planning”?
<b>10</b>	What is a “system”?
<b>11</b>	What is “effective”?
<b>12</b>	What are “critical controls”, “mitigating controls” and “underpinning controls”?
<b>13</b>	What is a “bowtie analysis”?
<b>24</b>	Can corporate documentation be used to demonstrate facility-level commitment?
<b>27</b>	What could be included in an industrial hygiene program?
<b>28</b>	How can a facility set objectives and performance requirements for critical controls?

<b>42</b>	What is an “audit”?
<b>43</b>	Can a company or facility achieve a Level AAA on satisfactory completion of an external audit, without having completed a Level AA internal audit?
<b>44</b>	What is the validity period for internal and external audits?

## Indicator 3: Psychological Safety and Respectful Behaviour

### PURPOSE

To confirm that the facility implements processes and programs to promote psychological safety and respectful behaviour in the workplace.

### ASSESSMENT CRITERIA:

LEVEL	CRITERIA
<b>C</b>	The facility does not meet all Level B criteria.
<b>B</b>	<ol style="list-style-type: none"> <li>1. The facility has developed an action plan to meet all Level A requirements.</li> <li>2. The facility has a mechanism for workers to report incidents related to psychological safety and respect.</li> </ol>
<b>A</b>	<ol style="list-style-type: none"> <li>1. Existing policies and processes are reviewed to integrate the promotion of psychological safety and respectful behaviour.</li> <li>2. The facility has programs to promote and encourage health and wellness, including mental health and a healthy lifestyle.</li> <li>3. The facility communicates to workers its policies and processes to promote psychological safety and respectful behaviour.</li> <li>4. There are trauma-informed processes to report and respond to incidents of psychologically unsafe, harmful, or disrespectful behaviour in the workplace. These include: <ol style="list-style-type: none"> <li>a. Training and resources to support informal incident resolution among coworkers, with the aim of fostering a workplace culture of continual improvement and learning related to psychological safety and respect.</li> <li>b. A prompt, confidential, and impartial mechanism for reporting and responding to concerns, complaints, or suggestions that require support or investigation beyond informal incident resolution processes.</li> </ol> </li> </ol>

<b>AA</b>	<ol style="list-style-type: none"> <li>1. The facility collaborates with relevant internal or external communities of interest to review its trauma-informed reporting and response processes at Level A and, if appropriate, to develop alternative processes.</li> <li>2. The facility communicates to its broader supply chain its policies and processes to promote psychological safety and respect.</li> <li>3. The facility sets performance objectives, or applies performance objectives set at the corporate level, related to psychological safety and respect. These include: <ol style="list-style-type: none"> <li>a. Action plans developed to achieve performance objectives.</li> <li>b. Demonstration of progress towards performance objectives and internal reporting on this progress.</li> </ol> </li> <li>4. A program is developed to support worker mental health and assist when required.</li> </ol>
<b>AAA</b>	<ol style="list-style-type: none"> <li>1. There is an internal audit at least every three years of the Level A and Level AA criteria. <ol style="list-style-type: none"> <li>a. The internal audit engages a cross-section of perspectives and experiences that include relevant labour or worker groups and individuals who are underrepresented in the mining industry.</li> <li>b. Results of the internal audit are communicated to workers and reported publicly.</li> </ol> </li> <li>2. The facility collaborates with relevant communities of interest to promote psychological safety and respect in community settings.</li> <li>3. The facility integrates the principles of psychological safety and respect into its procurement processes and contractor relationships.</li> </ol>

## FAQs: Psychological Safety and Respectful Behaviour

#	FAQ
15	What is the difference between “psychological safety” and “psychological health and safety”?
16	What is a “psychosocial hazard”?
17	What does “trauma-informed” mean?
18	What are “harmful behaviours”?
29	Which groups are underrepresented in the mining sector?
30	How can companies support informal incident resolution among workers?
31	What should a facility consider when designing a response mechanism for unsafe, harmful, or disrespectful behaviours in the workplace?
32	What are some examples of external mechanisms that can be used to address issues like harassment, discrimination, or violence?

33	What are some considerations for workplace design that prioritize psychological safety, respect, and accessibility?
34	What are some resources to support companies in addressing sexual harassment?
35	What does a program to support worker mental health entail?
36	How can a facility collaborate with relevant communities of interest to promote psychologically safe, healthy, and respectful behaviour in community settings?
42	What is an “audit”?
43	Can a company or facility achieve a Level AAA on satisfactory completion of an external audit, without having completed a Level AA internal audit?
44	What is the validity period for internal and external audits?

## Indicator 4: Training, Behaviour and Culture

### PURPOSE

To confirm that processes have been established to effectively train employees and contractors on safe, healthy, and respectful workplaces. The aim of this indicator is to ensure that employees and contractors are competent in identifying hazards and preventing incidents, and that they understand safety, health, and respect as a shared responsibility that is integral to controlling risk.

### ASSESSMENT CRITERIA:

LEVEL	CRITERIA
C	The facility does not meet all Level B criteria.
B	<ol style="list-style-type: none"> <li>1. Basic training on safety and health hazards and risks, including high consequence tasks, has been provided at the facility and training records are maintained.</li> <li>2. Basic training on psychological safety, respectful behaviour, identification of psychosocial hazards, and assessment of psychosocial risks, has been provided at the facility; training records are maintained.</li> <li>3. The facility has developed an action plan to meet all Level A requirements.</li> </ol>
A	<ol style="list-style-type: none"> <li>1. Planned, documented and functional safe, healthy, and respectful workplace training and awareness programs are in place that include: <ol style="list-style-type: none"> <li>a. Training needs analysis for employees, including consideration of required skills and competencies.</li> <li>b. Training for employees and on-site contractors.</li> </ol> </li> </ol>

	<ul style="list-style-type: none"> <li>c. Orientation for visitors.</li> <li>d. The training program is implemented and includes a mechanism for review.</li> <li>e. Training records are maintained.</li> <li>f. Resources are assigned to implement and maintain the training program.</li> <li>g. Workers are assessed for competency upon completing required training programs.</li> <li>h. Processes to ensure that trainers are competent and/or to ensure the quality of training programs.</li> <li>i. A task observation program for physical safety and health that supports and reinforces training to ensure routine safety checks and coaching are in place to encourage safe behaviour and work practices.</li> <li>j. An observation and engagement program for psychological safety and respect that supports and reinforces training.</li> <li>k. The facility has mechanisms in place for the participation of workers in hazard identification, in risk assessment and determination of controls, and in setting health, safety, and respectful workplace objectives.</li> </ul> <p>2. The training and awareness program includes hazard identification and control, with a focus on preventative and proactive measures. This should address physical and psychosocial hazards and provide internal and external mechanisms to address these issues.</p>
<b>AA</b>	<p>1. The facility encourages organizational engagement by integrating safe, healthy, and respectful workplace criteria into core business processes and practices, including:</p> <ul style="list-style-type: none"> <li>a. The annual business strategy and action plan.</li> <li>b. Purchasing decisions.</li> <li>c. Performance appraisal processes.</li> <li>d. The compensation system (i.e., compensation is affected by safety and health performance).</li> </ul> <p>2. Guidelines are implemented for workplace design and culture that prioritize physical and psychological safety, respect, and accessibility.</p>
<b>AAA</b>	<p>1. The commitment to safe, healthy, and respectful workplaces is visibly embedded throughout the facility.</p> <p>2. Facility management visibly model a commitment to safe, healthy, and respectful behaviour and culture in interactions with employees.</p> <p>3. Processes are in place to monitor and assess the effectiveness of training programs.</p>

## FAQs: Training, Behaviour and Culture

#	FAQ
10	What is a “system”?
11	What does “effective” mean?
19	What is an “observation program”?
20	What is “compensation”?
24	Can corporate documentation be used to demonstrate facility-level commitment?
37	How can a company demonstrate that they have assessed the competency and effectiveness of its trainers?

## Indicator 5: Monitoring and Reporting

### PURPOSE

To confirm that physical and psychological safety and health performance is regularly monitored and is reported both internally and externally.

### ASSESSMENT CRITERIA :

LEVEL	CRITERIA
<b>C</b>	The facility does not meet all Level B criteria.
<b>B</b>	<ol style="list-style-type: none"> <li>1. Some basic metrics on training, safety, and health are monitored and reported to facility management on a regular basis, going beyond regulatory requirements.</li> <li>2. Key performance indicators are reported or posted within the facility.</li> <li>3. The facility has developed an action plan to meet all Level A requirements.</li> </ol>
<b>A</b>	<ol style="list-style-type: none"> <li>1. Documented physical and psychological safety and health monitoring and reporting occurs, including:               <ol style="list-style-type: none"> <li>a. Performance metrics are clearly defined, consistently applied, regularly assessed (including against broader industry performance) and internally reported.</li> <li>b. Performance metrics are used to analyze trends for informing decisions and guiding continuous improvement.</li> <li>c. Data is collected on the number and types of reported issues related to psychological safety and respectful behaviour, with ongoing monitoring and analysis of this data.</li> <li>d. A physical safety and health monitoring program that includes tracking and internal reporting of leading and lagging indicators, safety and health and industrial hygiene inspection and monitoring, health surveillance, and incident investigation and follow-up.</li> <li>e. A physical safety and health audit program is in place and compliance audits and management system audits are conducted in accordance with the audit plan.</li> <li>f. The physical safety and health monitoring and audit programs include a focus on high consequence hazards.</li> <li>g. The facility assesses the adequacy and effectiveness of its safety and health management system annually and makes recommendations for continual improvement.</li> <li>h. Regular management review of physical and psychological safety and health performance takes place for the purpose of continual improvement and to inform decision-making.</li> </ol> </li> </ol>

	<ul style="list-style-type: none"> <li>i. Results of workplace monitoring, inspection and follow-up action are recorded and communicated within the facility.</li> <li>j. Physical and psychological safety and health performance is communicated to the public at least once per year.</li> </ul>
<b>AA</b>	<ol style="list-style-type: none"> <li>1. An internal audit has been conducted to determine whether the physical safety and health data and information collection, compilation and reporting meets the requirements of Level A.</li> <li>2. Thresholds and triggers related to the performance of physical safety and health critical controls are in the process of being developed and implemented, with some thresholds and triggers already in place.</li> <li>3. The physical safety and health monitoring and audit programs include a focus on critical controls.</li> <li>4. The facility analyzes aggregated and anonymized information on the response, resolution, and/or remediation of respectful workplace and psychological safety issues reported to the facility's response mechanism and conducts ongoing monitoring and analysis.</li> </ol>
<b>AAA</b>	<ol style="list-style-type: none"> <li>1. An external audit is conducted to determine whether the safety and health data and information collection, compilation and reporting meet the requirements of Level A.</li> <li>2. An internal evaluation of effectiveness is conducted, and a tracking process is in place for improvement opportunities identified. This includes evaluation of the quality of investigations and the close-out of actions, contributing to a culture of continuous improvement.</li> </ol>

## FAQs: Monitoring and Reporting

#	FAQ
<b>10</b>	What is a "system"?
<b>11</b>	What is "effective"?
<b>21</b>	What is "health surveillance"?
<b>22</b>	What is "workplace monitoring"?
<b>23</b>	What are "thresholds" and "triggers"?
<b>24</b>	Can corporate documentation be used to demonstrate facility-level commitment?
<b>38</b>	How can psychological safety and respectful behaviour be assessed against broader industry performance?
<b>39</b>	What kind of information can facilities report on psychological safety and health performance?

<b>42</b>	What is an “audit”?
<b>43</b>	Can a company or facility achieve a Level AAA on satisfactory completion of an external audit, without having completed a Level AA internal audit?
<b>44</b>	What is the validity period for internal and external audits?

## Indicator 6: Physical Safety and Health Performance

### PURPOSE

Recognizing that zero harm is the goal for all facilities, the purpose of this indicator is to confirm that continual improvement targets for physical safety and health have been established at each facility and that performance relative to targets is assessed. If a facility experienced a fatality in the reporting year, it is not eligible for Level A or higher.

### ASSESSMENT CRITERIA :

LEVEL	CRITERIA
<b>C</b>	The facility does not meet all Level B criteria.
<b>B</b>	<ol style="list-style-type: none"> <li>1. Physical safety and health performance targets are set for employees of the facility.</li> <li>2. Targets are communicated to employees.</li> <li>3. The facility has developed an action plan to meet all Level A requirements.</li> </ol>
<b>A</b>	<ol style="list-style-type: none"> <li>1. Performance targets include on-site contractors.</li> <li>2. Facility management is involved in reviewing and improving performance relative to targets.</li> <li>3. Performance results are communicated to employees and on-site contractors.</li> <li>4. The facility has not had a fatality in the reporting year.</li> </ol>
<b>AA</b>	<ol style="list-style-type: none"> <li>1. Performance targets are set for both leading and lagging indicators.</li> <li>2. Senior management reviews performance against facility targets and associated improvement plans.</li> <li>3. The facility (or company) benchmarks its physical safety and health performance against its peers.</li> </ol>
<b>AAA</b>	<ol style="list-style-type: none"> <li>1. The facility has consistently met its continual improvement performance targets (at least three of the last four years) and is fatality-free over the entire four-year period.</li> <li>2. The facility externally audits its physical safety and health performance to ensure accuracy and reliability.</li> </ol>



## FAQs: Monitoring and Reporting

#	FAQ
3	What is “senior management”?
24	Can corporate documentation be used to demonstrate facility-level commitment?
40	What level of benchmarking is adequate?
41	Can a fatality prevent a facility from achieving a level A for indicator 6?
42	What is an “audit”?
43	Can a company or facility achieve a Level AAA on satisfactory completion of an external audit, without having completed a Level AA internal audit?
44	What is the validity period for internal and external audits?

# Appendix 1: Frequently Asked Questions

Frequently Asked Questions are a mandatory component of self-assessments and external verifications against TSM protocols. Facilities must review and follow the definitions and guidance below to support appropriate interpretation and implementation of the criteria outlined in the protocol.

## DEFINITIONS

### 1. What is a “workplace”?

There are several useful definitions of a workplace. For example, the National Standard of Canada on Psychological Health and Safety in the Workplace defines a workplace as:

*“An area or location where a worker works for an organization or is required or permitted to be present while engaging in service (including social events) on behalf of an organization.”*

Safe Work Australia defines a workplace as:

*“Any place where work is carried out for a business or undertaking and includes any place where a worker goes, or is likely to be, while at work. This may include offices, factories, shops, construction sites, vehicles, ships, aircraft or other mobile structures on land or water.”*

For more information, see:

CAN/CSA-Z1003-13/BNQ 9700-803/2013 – Psychological Health and Safety in the Workplace.

<https://www.csagroup.org/article/canca-z1003-13-bnq-9700-803-2013-r2018/>

Safe Work Australia. n.d. A Glossary of common and complex terms and their definitions.

<https://www.safeworkaustralia.gov.au/glossary>

### 2. What is a “respectful workplace”?

A respectful workplace is one free from harmful behaviours like harassment, discrimination, bullying, or violence.

The Government of British Columbia, for example, defines a respectful workplace as:

*...one where integrity, fairness, collaboration, professionalism and trust are the norm.*

A respectful workplace:

- Is inclusive
- Values diversity
- Clearly communicates expectations around behaviour
- Promotes employee health and safety
- Provides resources and training to resolve disputes

- Strives for improvement
- Has open channels of communication

For more information, see:

Government of British Columbia. 2021. Promote respect in the workplace.

<https://www2.gov.bc.ca/gov/content/careers-myhr/all-employees/working-with-others/promote-respect>

### **3. What is “senior management”?**

For the purposes of safety and health performance measurement, senior management refers to the most senior level of management at the facility level (e.g., General Manager, Site Manager, etc.). Where the protocol requires that accountability for safety and health be assigned at all levels, the expectation would be that accountabilities at the site and at the business unit, regional or corporate level be defined (depending on the corporate structure and location of headquarters). Verification of this requirement will not require engagement with corporate headquarters located outside of the jurisdiction where the company is implementing TSM via a national association.

### **4. What is “accountability”?**

Accountability means that the safety and health management system must identify the party who is ultimately answerable for safety and health performance and the development and implementation of the safety and health management system at the facility. This accountability cannot be delegated. Resources are available to the accountable party to ensure proper systems (training, equipment, communications, etc.) are in place to effectively meet their safety and health goals.

### **5. What is “responsibility”?**

Responsibility means that, within the safety and health management system, specific safety- and health-related requirements and tasks are identified and assigned to specific positions within the facility. It is important that responsibilities are clearly communicated so that each position understands what is expected of them.

### **6. What is “hazard identification and risk assessment” (HIRA)?**

HIRA is a documented process that ensures that all safety and health hazards have been identified, the level of risk assessed, and controls put into place to manage the risk. A typical HIRA process includes the following:

- Site surveys.
- Hierarchy of controls.
- Risk register.
- Hazard and Operability (HAZOP) and Failsafe processes.
- Management of Change.

- Job Safety Analysis.
- Field-based risk assessments (or similar).
- Identification of events with a reasonable potential to result in a life-altering injury or occupational disease.

To demonstrate that a facility has “hazard identification, risk assessment and control processes” in place, it is expected the facility would have documented processes to identify hazards, assess associated risks and identify appropriate controls. A documented or electronic risk register would identify site hazards and controls in place to address the hazards, and the facility would have a risk assessment tool or process that can be applied at the field level. While HIRA is primarily applied in the context of physical safety and health, this structure can also be applied to workplace respect and psychological safety.

### **7. What is a “control”?**

This term refers to an act, object (engineered) or system (combination of act and object) intended to prevent or mitigate an unwanted event or to reduce or eliminate the consequences of an unwanted event.

For more information, see: ICMM. 2015. Health and Safety Critical Control Management.

<http://www.icmm.com/website/publications/pdfs/health-and-safety/8570.pdf>

### **8. What is a “qualified hygienist”?**

To achieve Level AA for Indicator 2, the facility must be able to demonstrate that its industrial hygiene risks and controls have been reviewed by a qualified hygienist. To achieve Level AAA for Indicator 2, the facility must be able to demonstrate that its industrial hygiene program is overseen by a qualified hygienist. These reviews should be conducted by, or under the direction of, a person who is qualified based on knowledge, training and/or experience in accordance with recognized occupational hygiene practice.

### **9. What is “planning”?**

Planning includes activities such as identifying hazards, assessing risk, and determining controls; identifying and having access to applicable legal requirements; and, establishing and maintaining documented objectives and supporting programs at relevant functions and levels within the facility (adapted from OHSAS 18001:2007).

### **10. What is a “system”?**

A system, or management system, represents processes that collectively provide a systematic framework for ensuring that tasks are performed correctly, consistently, and effectively to achieve a specified outcome and to drive continual improvement in performance. A systems approach to management requires an assessment of what needs to be done, planning to achieve the objective,

implementation of the plan and review of performance in meeting the set objective. A management system also considers necessary personnel, resources, and documentation requirements. Other definitions associated with systems are:

**Policy:** The expression of management's commitment to a particular issue that presents the stance of the company to interested external parties.

**Practice:** Informal, undocumented approaches to carrying out a task.

**Procedure:** A repeatable description of how a task is to be carried out.

### **11. What is “effective”?**

Where the term effective is used, it requires the element to be operational so that desired outcomes can be achieved.

### **12. What are “critical controls”, “mitigating controls” and “underpinning controls”?**

As indicated in FAQ 7, a control is an act, object or system intended to prevent or mitigate an unwanted event or to reduce or eliminate the consequences of an unwanted event.

A critical control is one that is crucial to preventing or mitigating the consequences of a material unwanted event. The absence or failure of a critical control would significantly increase risk despite the existence of other controls. A control that prevents more than one unwanted event or mitigates more than one consequence is normally classified as critical. A critical mitigating control eliminates or reduces to within an acceptable threshold the consequences of the material unwanted event.

A mitigating control is one that eliminates or reduces the consequences of the unwanted event.

An underpinning control is an activity or mechanism that is not critical (i.e., does not represent a direct barrier to an unwanted event) but is important in maintaining or supporting the effectiveness of critical controls. These might include training systems, monitoring activities, and operating or response plans. This is a broad category that may include activities within the management systems that support having the critical control able to do what is required, such as inspections, and that may provide information for verification of the status of the critical control.

For more information, see:

ICMM. 2015. Health and Safety Critical Control Management. <https://www.icmm.com/en-gb/guidance/health-safety/2015/ccm-good-practice-guide>

### **13. What is a “bowtie analysis”?**

A bowtie analysis (BTA) is an analytical method for identifying and reviewing controls intended to prevent or mitigate a specific unwanted event.

For more information, see:

ICMM. 2015. Health and Safety Critical Control Management. <https://www.icmm.com/en-gb/guidance/health-safety/2015/ccm-good-practice-guide>

### **14. What is the difference between “psychological safety” and “psychological health and safety”?**

In *The 4 Stages of Psychological Safety: Defining the Path to Inclusion and Innovation*, Timothy R. Clark outlines four stages of psychological safety—that is, creating the conditions in which individuals feel: 1) included, 2) safe to learn, 3) safe to contribute, and 4) safe to challenge the status quo. As the basis

of psychological safety, 'inclusion safety' has strong links to the *TSM Equitable, Diverse, and Inclusive Workplaces Protocol*.

The National Standard of Canada on Psychological Health and Safety in the Workplace defines psychological safety as “the absence of harm and/or threat of harm to mental well-being that a worker might experience” with a note that “improving the psychological safety of a work setting involves taking precautions to avert injury or danger to worker psychological health”. It also defines a psychologically healthy and safe workplace as “a workplace that promotes workers’ psychological well-being and actively works to prevent harm to worker psychological health including in negligent, reckless, or intentional ways.” Psychosocial risk factors are defined as “hazards including elements of the work environment, management, practices, and/or organizational dimensions that increase the risk to health.”

For more information on psychological safety, see:

CAN/CSA-Z1003-13/BNQ 9700-803/2013 – Psychological Health and Safety in the Workplace.

<https://www.csagroup.org/article/canrsa-z1003-13-bnq-9700-803-2013-r2018/>

Canadian Centre for Occupational Health and Safety. 2023. Psychological Health and Safety for Employers. <https://www.ccohs.ca/products/courses/phs-employers/>

ISO 45003:2021 Occupational health and safety management — Psychological health and safety at work — Guidelines for managing psychosocial risks. <https://www.iso.org/standard/64283.html>

Timothy R. Clark. 2020. The 4 Stages of Psychological Safety: Defining the Path to Inclusion and Innovation. Berrett-Koehler Publishers, Inc.

## 15. What is a “psychosocial hazard”?

According to WorkSafe Victoria, “psychosocial hazards are factors in the design or management of work that increase the risk of work-related stress and can lead to psychological or physical harm”. Physical impacts of psychosocial hazards can include increased accident and injury rates or physical violence or harassment towards coworkers or other individuals inside or outside the workplace. According to the Government of Western Australia Department of Mines, Industry Regulation and Safety, these include: “stress, fatigue, bullying, violence, aggression, harassment and burnout, which can be harmful to the health of workers and compromise their wellbeing”.

For more information, see:

WorkSafe Victoria. 2022. Psychosocial hazards contributing to work-related stress.

<https://www.worksafe.vic.gov.au/psychosocial-hazards-contributing-work-related-stress>

Australian Government Comcare. 2022. Psychosocial hazards. <https://www.comcare.gov.au/safe-healthy-work/prevent-harm/psychosocial-hazards>

Safe Work Australia. n.d. Psychosocial hazards. <https://www.safeworkaustralia.gov.au/safety-topic/managing-health-and-safety/mental-health/psychosocial-hazards>

Government of Western Australia Department of Mines, Industry Regulation and Safety. n.d. Psychosocial hazards overview. <https://www.dmp.wa.gov.au/Safety/Psychosocial-hazards-overview-25390.aspx>

Canadian Centre for Occupational Health and Safety. 2022. Musculoskeletal Disorders - Psychosocial Factors. <https://www.ccohs.ca/oshanswers/psychosocial/musculoskeletal.html>

Guarding Minds @ Work. 2020. Know the Psychosocial Factors. <https://www.guardingmindsatwork.ca/about/about-psychosocial-factors>

## 16. What does “trauma-informed” mean?

The Minerals Council of Australia provides important guidance on trauma-informed care and practice in the context of responses to sexual harassment and violence. In brief, this means emphasizing physical, psychological, and emotional safety for impacted individuals and groups, and others involved in responding to issues raised through informal and formal response mechanisms.

Minerals Council of Australia. 2021. How to support persons affected by sexual harassment – trauma informed care. [https://www.minerals.org.au/sites/default/files/Respect%40Work\\_Guidance%20-%20How%20to%20support%20affected%20persons%20-%20trauma%20informed%20care.pdf](https://www.minerals.org.au/sites/default/files/Respect%40Work_Guidance%20-%20How%20to%20support%20affected%20persons%20-%20trauma%20informed%20care.pdf)

## 17. What are “harmful behaviours”?

According to Safe Work Australia: “Harmful behaviours can harm the person they are directed at and anyone who witnesses the behaviour”. They include:

- Violence and aggression
- Bullying
- Harassment, including sexual harassment or gender-based harassment, racism, ablism, and agism
- Conflict or poor workplace relationships and interactions

## 18. What is an “observation program”?

An observation program may have different elements depending on the area of focus.

For example, job or task observations help to eliminate unsafe or hazardous acts and conditions. They actively encourage the whole workforce to be involved and therefore generate greater safety awareness both individually and collectively. It is a process normally performed by supervision and management with the involvement of the workforce. There are four fundamental steps in a job observation process:

1. Plan to observe.
2. Observe a task.
3. Provide positive feedback or reinstruction back to the worker(s).
4. Look for a commitment to continue to perform the work in a healthy and safe manner.

The observation process can be used to check in on the effectiveness of hazard identification and risk assessment programs as well as health and safety management systems (e.g., field level risk assessments, procedures, training, rules and standards, results of safety investigations).

Specific to the topics of psychological safety and respectful behaviour, an observation program may consider how supervisors relate to employees and how colleagues interact with one another, including observation of visible felt leadership and coaching to improve observed behaviours.

## 19. What is “compensation”?

Compensation is defined as the total rewards package provided to employees.

#### **20. What is “health surveillance”?**

Occupational health surveillance is the analysis of health information intended to identify problems resulting from occupational exposures that require prevention activities. Surveillance functions as a feedback loop to the employer. Surveillance uses screening results from a group of employees, or a single employee, to look for abnormal trends in health status. A review of group results helps to identify potential exposure problems and assesses the effectiveness of existing worksite controls and preventive strategies. Personal medical histories of employees must be kept confidential.

#### **21. What is “workplace monitoring”?**

Workplace monitoring may include, but is not limited to, such items as workplace examination, industrial hygiene monitoring, fitness for duty monitoring, ambient workplace conditions, or other similar activities.

#### **22. What are “thresholds” and “triggers”?**

Companies are responsible for defining thresholds of unacceptable critical control performance. Performance below those thresholds should trigger action, which might vary from an investigation to an order to immediately stop the relevant work processes.

For more information, see:

ICMM. 2015. Health and Safety Critical Control Management.

<http://www.icmm.com/website/publications/pdfs/health-and-safety/8570.pdf>

### **FREQUENTLY ASKED QUESTIONS**

#### **23. Can corporate documentation be used to demonstrate facility-level commitment?**

Written senior management commitment at the corporate level (e.g., a corporate policy) can only be accepted as evidence during a facility-level self-assessment or TSM verification if it is accompanied by evidence that the corporate commitment is being applied and adhered to at the facility level. There must be evidence of a link between the corporate documentation and facility-level practices. If this linkage is established, then the corporate documentation can be accepted as evidence of facility-level commitment.

#### **24. How can a facility determine if safety and health commitments are consistent with the TSM Framework on Safe, Healthy, and Respectful Workplaces?**

The *TSM Framework on Safe, Healthy, and Respectful Workplaces* establishes several commitments that member companies agree to follow. The spirit and intent of a company's safety and health commitments should be consistent with the framework. The company's commitments do not need to explicitly reference the framework, nor all commitments outlined in the framework.



## **25. How can employees demonstrate their commitment to safe, healthy, and respectful workplaces?**

There are several ways to assess whether employees demonstrate a commitment to safe, healthy, and respectful workplaces. For example: verifications or inspections of the workplace, employee surveys on key themes (e.g., discrimination, harassment), or adherence to safety policies and rules (e.g., wearing personal protective equipment, reporting unsafe circumstances or behaviours, etc.).

## **26. What could be included in an industrial hygiene program?**

Typically, an industrial hygiene program will consist of the following:

- Anticipation of potential exposures arising from workplace activities (e.g., purchasing and use of hazardous substances).
- Identification (sometimes called recognition) of exposures by qualitative means (e.g., workplace walk-through surveys).
- Evaluation of identified exposures by monitoring and sampling of contaminants (qualitative and quantitative against applicable criteria).
- Control of exposures to acceptable levels (a hierarchy of control is used).
- Effectiveness of controls – are they working as intended to reduce or eliminate exposures.

## **27. How can a facility set objectives and performance requirements for critical controls?**

Defining critical controls' objectives, performance requirements and how performance is verified in practice is an important step in critical control management. A company can start by defining the objective of the critical control to fully understand its role, expectations, and outcomes. The performance requirements, the standards to which a control must perform, consist of an action and a value. Performance requirements for a control may already exist within company documents. This can be determined by reviewing the relevant processes, procedures, maintenance manuals and other support documents. Industry standards may also help to determine performance requirements. However, caution should be applied as industry-wide standards may not be specific or relate directly to the context of the control. Performance requirements should be specific, measurable, appropriate, and realistic. It is also important to define the level of performance that would initiate immediate action to shut down or change an operation or to signal that improvements to the critical control are required.

For more information, see: ICMM. 2015. Critical Control Management Implementation Guide.

<http://www.icmm.com/website/publications/pdfs/health-and-safety/8570.pdf>

## **28. Which groups are underrepresented in the mining sector?**

In different national and local contexts, different groups are likely to be underrepresented and to experience varying degrees of vulnerability and marginalization in the mining sector. Companies are encouraged to review relevant local legislation and available workforce and demographic data and

collaborate with workers and relevant communities of interest to identify underrepresented groups in their respective local and national contexts.

The United Nations, for example, references “international instruments to combat specific forms of discrimination, including discrimination against indigenous peoples, migrants, minorities, people with disabilities, discrimination against women, racial and religious discrimination, or discrimination based on sexual orientation and gender identity”.

In Canada, the *Employment Equity Act* identifies four employment equity groups: women, Aboriginal peoples, persons with disabilities, and members of visible minorities. In the United States, Title VII of the Civil Rights Act prohibits employment discrimination based on race, colour, religion, sex, and national origin.

A subnational example is the Human Rights Code in the Canadian province of Ontario, which states that: “Discrimination based on 17 different personal attributes – called grounds – is against the law under the Code. The grounds are citizenship, race, place of origin, ethnic origin, colour, ancestry, disability, age, creed, sex/pregnancy, family status, marital status, sexual orientation, gender identity, gender expression, receipt of public assistance (in housing) and record of offences (in employment).”

Companies are not limited by the definitions of international and local legal instruments and might use these as a starting point for discussion with their workers and relevant communities of interest when identifying groups underrepresented in the jurisdictions where they operate. While some companies may begin these efforts by focusing on certain underrepresented groups, the ultimate objective should be to create a workplace that is equitable, diverse, and inclusive for everyone.

**For more information, see:**

United Nations. n.d. Equality and Non-Discrimination.

<https://www.un.org/ruleoflaw/thematic-areas/human-rights/equality-and-non-discrimination/> (This webpage contains links to international instruments to combat specific forms of discrimination)

Ontario Human Rights Commission. 2013. Guide to your rights and responsibilities under the Human Rights Code. <https://www.ohrc.on.ca/en/guide-your-rights-and-responsibilities-under-human-rights-code-0> (This document explains the Ontario Human Rights Code, including examples derived from real-life scenarios.)

Government of Canada. 1995. Employment Equity Act (S.C. 1995, c. 44).

<https://laws-lois.justice.gc.ca/eng/acts/E-5.401/index.html>

U.S. Equal Employment Opportunity Commission. 2000. Title VII of the Civil Rights Act of 1964.

<https://www.eeoc.gov/statutes/title-vii-civil-rights-act-1964>

## **29. How can companies support informal incident resolution among workers?**

Various types of training and resources can help workers to build the skills and understanding to address incidents of harmful, unsafe, or disrespectful behaviour in the workplace. Facilities should aim to develop a workplace culture that supports dialogue, conflict resolution, and understanding to resolve such incidents, while also offering a formal reporting and response mechanism for any incidents that need to be escalated to seek an effective resolution. For example, through appropriate bystander training and supports, workers and managers might be empowered to address behaviours like microaggressions and incivility before they escalate into more serious behaviours or incidents.

## **30. What should a facility consider when designing a response mechanism for unsafe, harmful, or disrespectful behaviors in the workplace?**

When establishing or reviewing a response mechanism, it is important that workers trust that their concerns will be taken seriously and that the facility will act as appropriate. Facilities may enhance existing response mechanisms or develop new mechanisms to meet the requirements of this protocol.

When developing or reviewing a response mechanism, facilities should consider the following elements:

- Workers are aware of the mechanism, how it works, and how and when to access it.
- The response process is prompt and involves regular updates to impacted individuals or groups until the issue is resolved.
- The response process aims to protect the confidentiality of impacted individuals or groups, unless otherwise requested, to mitigate concerns of victimization or reprisal.
- The response mechanism is equipped with trauma-informed, early intervention strategies to support impacted individuals or groups, and these supports remain available during and after the investigation process.
- The investigation process is confidential and impartial and considers the duty of care that is appropriate to all involved individuals or groups, with input sought from the impacted individual or group regarding the approach to the investigation.
- The investigation process seeks to establish what occurred, as well as the root and contributing causes.
- Confidential records are maintained of issues reported to the mechanism, including responses, outcomes, and timeframes.
- There is a process to evaluate the response mechanism process, review lessons learned, and adjust the process as necessary.

This is not to say that all outcomes will fully satisfy all parties. Even if the outcome of the response mechanism is not that desired by the impacted individual(s), resources should be available to support those impacted by the reported incident. It can be important to acknowledge that an individual may have experienced harm even if their experience differs from the findings of the investigation process.

**31. What are some examples of external mechanisms that can be used to address issues like harassment, discrimination, or violence?**

While this protocol requires companies to have trauma-informed processes to respond to incidents of unsafe, harmful, or disrespectful behaviour in the workplace, it is also important to recognize that there are external legal mechanisms available to workers to resolve issues like harassment, discrimination, or violence. For example, in the Canadian context, the Canadian Human Rights Tribunal, provincial human rights bodies and organisations, criminal code, employment/labour laws, professional licensing bodies, mediation and alternate dispute resolution services, police services, and collective agreements.

### **32. What are some considerations for workplace design that prioritize psychological safety, respect, and accessibility?**

There are many ways in which physical infrastructure and equipment can impact workplace safety and accessibility. Some considerations might include placement of women's washrooms; gender neutral infrastructure; personal protective equipment appropriate to different genders, body types, and physical needs; or private space for needs like breastfeeding or prayer. These needs will be unique to each workplace and should be identified through engagement with workers and relevant communities of interest, as well as through internal assessments or audits.

Companies should engage workers and relevant communities of interest to identify and assess physical and psychosocial hazards that may impede their efforts to promote inclusive and respectful workplaces. For example, facilities can identify and assess physical barriers to safety, equity, and accessibility, such as gender-appropriate facilities and personal protective equipment for a range of body types and needs. Interpersonal behaviours, such as violence or harassment, can also impact workers. Measures to address identified hazards and risks should be developed and implemented.

### **33. What are some resources to support companies in addressing sexual harassment?**

The Minerals Council of Australia has developed an Industry Code to implement its commitment to eliminate sexual harassment. This Industry Code outlines expectations for companies to develop a culture of respect, with a focus on honest, respectful, and open communications. The document outlines key measures to prevent and respond to sexual harassment.

For more information, see:

Minerals Council of Australia. 2021. Industry Code on Eliminating Sexual Harassment

[https://www.minerals.org.au/sites/default/files/Sexual%20Harassment\\_Industry%20Code%20of%20Conduct\\_March%202021.pdf](https://www.minerals.org.au/sites/default/files/Sexual%20Harassment_Industry%20Code%20of%20Conduct_March%202021.pdf)

Mining Industry Human Resources Council. 2022. Safe Workplaces for All Report: Addressing Sexual

Harassment in Canadian Mining. <https://mihrc.ca/wp-content/uploads/2022/11/Safe-Workplaces-For-All-Report-EN.pdf>

See also:

Me Too Mining Association. 2019. DIGGER Program Training.

<https://www.metoomining.com/training.html>

### **34. What does a program to support worker mental health entail?**

There are many useful resources that provide guidelines and recommendations for worker mental health programs. For example:

World Health Organization. 2022. WHO Guidelines on Mental Health at Work.

<https://www.who.int/publications/i/item/9789240053052>

Mental Health Commission of Canada. 2023. 13 Factors: Addressing Mental Health in the Workplace.

<https://mentalhealthcommission.ca/13-factors-addressing-mental-health-in-the-workplace/>

CAMH. 2020. Workplace Mental Health: A Review and Recommendations. [https://www.camh.ca/-](https://www.camh.ca/-/media/files/workplace-mental-health/workplacementalhealth-a-review-and-recommendations-pdf.pdf)

[/media/files/workplace-mental-health/workplacementalhealth-a-review-and-recommendations-pdf.pdf](https://www.camh.ca/-/media/files/workplace-mental-health/workplacementalhealth-a-review-and-recommendations-pdf.pdf)

Canadian Centre for Occupational Health and Safety. 2022. Workplace Health and Well-being.

[https://www.ccohs.ca/oshanswers/psychosocial/wh/mentalhealth\\_work.html](https://www.ccohs.ca/oshanswers/psychosocial/wh/mentalhealth_work.html)

Workplace Strategies for Mental Health. 2023. Mental Health Policies and Programs.

<https://www.workplacestrategiesformentalhealth.com/resources/mental-health-policies-and-programs>

### **35. How can a facility collaborate with relevant communities of interest to promote psychologically safe, healthy, and respectful behavior in community settings?**

Through engagement with workers and local communities, facilities might identify several ways to promote psychologically safe, healthy, and respectful behaviour in community settings. For example, sharing anti-racism training programs with community organizations or providing financial support for a regional hotline for women facing abuse.

### **36. How can a company demonstrate that they have assessed the competency and effectiveness of its trainers?**

Considerations for determining whether a person is qualified include, but are not limited to:

- Previous training experience.
- Previous experience in performing the task or activity.
- Exam or acknowledgment from the facility on trainer competency.
- Knowledge and specific safety and health-related training, formal education, training, and third-party credentials.
- Demonstrated history in performing the task that is the subject of the training program.

### **37. How can psychological safety and respectful behaviour be assessed against broader industry performance?**

Unlike physical health and safety, where industry-level data on health and safety incidents is widely reported and available for analysis, there may currently be some limitations to benchmarking metrics on psychological safety and respectful behaviour given the limited availability of some of this data. As companies begin monitoring and reporting on these issues, availability of data may improve.

### **38. What kind of information can facilities report on psychological safety and respect performance?**

Facilities can collaborate with their employees and relevant communities of interest to determine the type of information that may be most relevant to report in relation to psychological safety and respect performance. Global Reporting Initiative (GRI) 403: Occupational Health and Safety, for example, includes issues like workplace violence and sexual harassment in its definition of a work-related incident and psychosocial hazards like verbal abuse, harassment, and bullying in its definition of a work-related hazard. Among other disclosures, GRI 403 requires companies to report:

- Processes used to investigate work-related incidents.
- Processes used to identify work-related hazards and assess risks.
- Processes for workers to report work-related hazards and hazardous situations.
- Training provided to workers on specific work-related hazards.
- Work-related hazards that pose a risk of high-consequence injury.
- Actions taken or underway to eliminate other work-related hazards.
- Work-related hazards that pose a risk of ill health.

For more information, see:

GRI. 2018. GRI 403: Occupational Health and Safety.

<https://www.globalreporting.org/standards/media/1910/gri-403-occupational-health-and-safety-2018.pdf>

### **39. What level of benchmarking is adequate?**

Recognizing the limitations of doing so, for Indicator 6: Physical Safety and Health Performance (Level AA), it is expected that the facility or company will compare its safety and health performance with the performance of others on a regular basis (i.e., within the last three years). Facilities or companies can use any of several methods or sources to obtain these comparative data including, for example, use of published industry data (where available), compilation of publicly available data, participation in benchmarking studies or initiation of benchmarking studies.

### **40. Can a fatality prevent a facility from achieving a Level A for indicator 6?**

Facilities that have experienced an occupational fatality within the reporting year are not eligible for level A or higher for indicator 6 (performance). An occupational fatality is defined as the death of an employee, contractor or visitor because of a work-related incident arising from an activity under management control.

## AUDITS

### 41. What is an “audit”?

An audit is a formal, systematic, and documented examination of conformance with explicit, agreed-upon, prescribed criteria. Audits evaluate and report on the degree of conformance with stipulated criteria, based on the systematic collection and documentation of relevant evidence. Audits involve some degree of judgment but are not designed to determine the root cause of deficiencies. Audits can be conducted by internal or external professionals.

An internal audit is conducted by employees of the company with appropriate knowledge and competencies. These employees must be independent, impartial, and objective with respect to the management of the facility being audited. For example, they could work at another facility or at the corporate level.

An external audit is conducted by auditors that are external to the company being audited. These auditors maintain an objective viewpoint throughout the audit process to ensure that findings and conclusions are based only on the evidence.

For Indicator 5: Monitoring and Reporting, it is expected that audit activities would assess the processes in place for collecting, compiling, and reporting safety and health data and information to confirm that defined processes are in place and to test that they are being consistently applied.

For Indicator 6: Performance (Level AAA), it is expected that external audit activities would test the robustness and accuracy of collected safety and health performance data by reviewing the base data that are collected, testing that these data were accurately screened and entered in a database, and conducting a data review of the aggregate numbers.

### 42. Can a company or facility achieve a Level AAA on satisfactory completion of an external audit, without having completed a Level AA internal audit?

Yes, because the TSM performance indicator assessment is a snapshot in time of a company or facility's status as it relates to each specific performance indicator. Assigning a rating of Level AA or AAA is based on whether an audit is internal or external. A company or facility does not need to do an internal audit (qualifying for a rating of Level AA) before receiving a rating of Level AAA for an external audit.

### 43. What is the validity period for internal and external audits?

An internal or external audit that was completed within the last three years meets the requirements for an internal or external audit as required by Level AA or Level AAA in many of the indicators of this protocol.



## ANNEXE 2: TSM SELF ASSESSMENT CHECKLIST

### SAFE, HEALTHY, AND RESPECTFUL WORKPLACES

<b>FACILITY NAME :</b>		<b>COMPANY NAME :</b>	
<b>ASSESSED BY :</b>		<b>DATE SUBMITTED :</b>	

SUPPORTING DOCUMENTATION / EVIDENCE :	
NAME OF DOCUMENT	LOCATION

INTERVIEWEES:			
NAME	POSITION	NAME	POSITION

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
<b>INDICATOR 1: COMMITMENTS AND ACCOUNTABILITY</b>					
<b>INDICATOR 1 LEVEL B</b>	1. Is a demonstrated commitment to safe, healthy, and respectful workplaces evident?				
	2. Is there one or more senior management representative accountable for safe, healthy, and respectful workplaces?				
	3. Has the facility developed an action plan to meet all Level A requirements?				
	<i>If you have answered "Yes" to all Level B questions, continue to the Level A questions. If you have not answered "Yes" to all Level B questions, assess the facility as a Level C.</i>				
<b>INDICATOR 1 LEVEL A</b>	1. Is there a demonstrated senior management commitment to safe, healthy, and respectful workplaces consistent with the intent of the TSM Safe, Healthy, and Respectful Workplaces Framework?				
	2. Is there a process in place to ensure that employees, contractors, and suppliers who work at the facility are aware of the company's safe, healthy, and respectful workplaces commitments?				
	a. Are management and employee accountabilities and responsibilities understood at all levels?				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
	<p><i>If you have answered “Yes” to all Level A questions, continue to the Level AA questions. If you have not answered “Yes” to all Level A questions, assess the facility as a Level B.</i></p>				
INDICATOR 1 LEVEL AA	1. Has an internal audit been conducted to determine:				
	a. The degree of consistency that the commitments are applied with respect to the intent of the TSM Safe, Healthy, and Respectful Workplaces Framework?				
	b. Whether accountabilities and responsibilities are understood by management and employees?				
	c. Whether accountabilities and responsibilities are understood by management and employees?				
	d. Whether the commitments to safety and health have been communicated to employees, contractors, and suppliers at the facility, and processes are in place to ensure their awareness of these commitments?				
	2. Do employees at the facility demonstrate their commitment to safe, healthy, and respectful workplaces?				
	<p><i>If you have answered “Yes” to all Level AA questions, continue to the Level AAA questions. If you have not answered “Yes” to all Level AA questions, assess the facility as a Level A.</i></p>				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
INDICATOR 1 LEVEL AAA	1. Has an external audit been conducted to determine:				
	2. The degree of consistency that the commitments are applied with respect to the intent of the TSM Safe, Healthy, and Respectful Workplaces Framework?				
	a. Whether accountabilities and responsibilities are understood by management and employees?				
	b. Whether the commitments have been communicated to employees, contractors, and suppliers at the facility?				
	c. The effectiveness of the process in place to ensure that employees, contractors, and suppliers who work at the facility are aware of the commitments?				
	<i>If you have answered "Yes" to all Level AAA questions, assess the facility as a Level AAA. If you have not answered "Yes" to all Level AAA questions, assess the facility as a Level AA.</i>				
<b>ASSESSED LEVEL OF PERFORMANCE FOR INDICATOR 1</b>				<b>LEVEL:</b> _____	



	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
<b>INDICATOR 2: SAFETY AND HEALTH MANAGEMENT SYSTEMS</b>					
<b>INDICATOR 2 LEVEL B</b>	1. Have some physical safety and health management systems been established, including a clear incident notification and investigation process?				
	2. Are risk control tools identified and available?				
	3. Has the facility identified the most common tasks?				
	4. Are standard operating procedures and safe work practices in place for the facility's most common tasks?				
	5. Has the company developed an action plan to meet all Level A requirements?				
	<i>If you have answered "Yes" to all Level B questions, continue to the Level A questions. If you have not answered "Yes" to all Level B questions, assess the facility as a Level C</i>				
<b>INDICATOR 2 LEVEL A</b>	1. Is a documented safety and health management system established, implemented, and maintained? At a minimum, does it incorporate:				
	a. Objectives and targets, with supporting plans to achieve them?				
	b. Hazard identification, risk assessment (HIRA) and control processes?				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
	c. Identification of high consequence hazards and related critical controls?				
	d. An industrial hygiene program?				
	e. Defined roles and responsibilities for physical safety and health management?				
	f. Workplace inspections?				
	g. Maintenance of physical safety and health records?				
	2. Are resources assigned to establish, implement, maintain, and improve the physical safety and health management system and validate effectiveness of controls?				
	<i>If you have answered "Yes" to all Level A questions, continue to the Level AA questions. If you have not answered "Yes" to all Level A questions, assess the facility as a Level B.</i>				
INDICATOR 2 LEVEL AA	1. Has an internal audit been conducted to determine whether planning and implementation of the physical safety and health management system meets the requirements of Level A?				
	2. Have industrial hygiene risks and controls been reviewed by a qualified hygienist?				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
	3. Has the facility verified that critical controls are in place and functioning, and does the definition differentiate between critical, mitigating, and underpinning controls?				
	4. Has the facility identified psychosocial hazards and harmful behaviours, and are potential risks assessed, managed, and monitored?				
	<i>If you have answered “Yes” to all Level AA questions, continue to the Level AAA questions. If you have not answered “Yes” to all Level AA questions, assess the facility as a Level A.</i>				
INDICATOR 2 LEVEL AAA	1. Has an external audit been conducted to determine whether planning and implementation of the physical safety and health management system meets the requirements of Level A?				
	2. Is an industrial hygiene program subject to the oversight of a qualified hygienist?				
	3. Have facility-specific and especially hazardous tasks been identified, and critical controls for those tasks been identified through an established controls identification methodology (e.g., bowtie analysis)?				
	<i>If you have answered “Yes” to all Level AAA questions, assess the facility as a Level AAA. If you have not answered “Yes” to all Level AAA questions, assess the facility as a Level AA.</i>				
	<b>ASSESSED LEVEL OF PERFORMANCE FOR INDICATOR 2</b>				<b>LEVEL: _____</b>



	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
<b>INDICATOR 3: PSYCHOLOGICAL SAFETY AND RESPECTFUL BEHAVIOUR</b>					
<b>INDICATOR 3 LEVEL B</b>	1. Has the facility developed an action plan to meet all Level A requirements?				
	2. Does the facility have a mechanism for workers to report incidents related to psychological safety and respectful behaviour?				
	<i>If you have answered “Yes” to all Level B questions, continue to the Level A questions. If you have not answered “Yes” to all Level B questions, assess the facility as a Level C</i>				
<b>INDICATOR 3 LEVEL A</b>	1. Have existing policies and processes been reviewed to integrate the promotion of psychological safety and respect?				
	2. Does the facility have programs to promote and encourage health and wellness, including mental health and a healthy lifestyle?				
	3. Does the facility communicate to workers its policies and processes to promote psychological safety and respect?				
	4. Are there trauma-informed processes to report and respond to incidents of psychologically unsafe, harmful, or disrespectful behaviour in the workplace? Do these include:				



	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
	a. Training and resources to support informal incident resolution among coworkers, with the aim of fostering a workplace culture of continual improvement and learning related to psychological safety and respect?				
	b. A prompt, confidential, and impartial mechanism for reporting and responding to concerns, complaints, or suggestions that require support or investigation beyond informal incident resolution processes?				
	<i>If you have answered “Yes” to all Level A questions, continue to the Level AA questions. If you have not answered “Yes” to all Level A questions, assess the facility as a Level B.</i>				
INDICATOR 3 LEVEL AA	1. Does the facility collaborate with relevant internal or external communities of interest to review its trauma-informed reporting and response processes at Level A and, if appropriate, to develop alternative processes?				
	2. Does the facility communicate to its broader supply chain its policies and processes to promote psychological safety and respect?				
	3. Does the facility set performance objectives, or apply performance objectives set at the corporate level, related to psychological safety and respectful behaviour? Do these include:				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
	a. Action plans developed to achieve performance objectives?				
	b. Demonstration of progress towards performance objectives and internal reporting on this progress.				
	4. Is a program developed to support worker mental health and assist when required?				
	<i>If you have answered "Yes" to all Level AA questions, continue to the Level AAA questions. If you have not answered "Yes" to all Level AA questions, assess the facility as a Level A.</i>				
INDICATOR 3 LEVEL AAA	1. Is there an internal audit at least every three years of the Level A and Level AA criteria?				
	a. Does the internal audit engage a cross-section of perspectives and experiences that include relevant labour or worker groups and individuals who are underrepresented in the mining industry?				
	b. Are the results of the internal audit communicated to workers and reported publicly?				
	2. Does the facility collaborate with relevant communities of interest to promote psychological safety and respect in community settings?				
	3. Does the facility integrate the principles of psychological safety and respect into its procurement processes and contractor relationships?				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
	<p><i>If you have answered "Yes" to all Level AAA questions, assess the facility as a Level AAA. If you have not answered "Yes" to all Level AAA questions, assess the facility as a Level AA.</i></p>				
	<p><b>ASSESSED LEVEL OF PERFORMANCE FOR INDICATOR 3</b></p>			<p><b>LEVEL:</b> _____</p>	

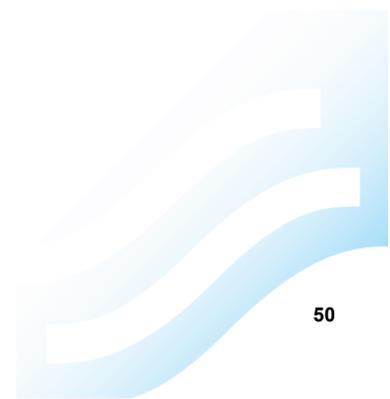
	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
<b>INDICATOR 4: TRAINING, BEHAVIOUR AND CULTURE</b>					
<b>INDICATOR 4 LEVEL B</b>	1. Has basic training on safety and health hazards and risks, including high consequence tasks, been provided at the facility and are training records maintained?				
	2. Has basic training on psychological safety, respectful behaviour, identification of psychosocial hazards, and assessment of psychosocial risks been provided at the facility? Are training records maintained?				
	3. Has the facility developed an action plan to meet all Level A requirements?				
	<i>If you have answered "Yes" to all Level B questions, continue to the Level A questions. If you have not answered "Yes" to all Level B questions, assess the facility as a Level C.</i>				
<b>INDICATOR 4 LEVEL A</b>	1. Is a planned, documented, and functional safety, healthy, and respectful workplace training program in place that includes:				
	a. Training needs analysis for employees, including consideration of required skills and competencies?				
	b. Training for employees and on-site contractors?				
	c. Orientation for visitors?				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
	d. The training program is implemented and includes a mechanism for review?				
	e. Training records are maintained?				
	f. Resources are assigned to implement and maintain the training program?				
	g. Workers are assessed for competency upon completing required training programs?				
	h. Processes to ensure that trainers are competent and/or to ensure the quality of training programs.				
	i. A task observation program for physical safety and health that supports and reinforces training to ensure routine safety checks and coaching are in place to encourage safe behaviour and work practices?				
	j. An observation and engagement program for psychological safety and respect that supports and reinforces training.				

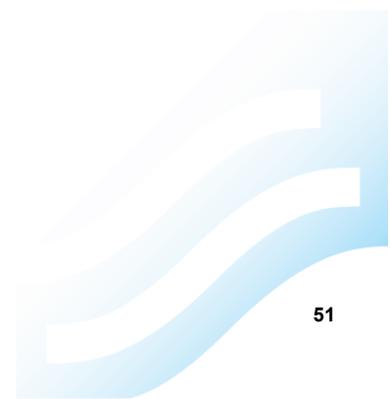


	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
	k. The facility has mechanisms in place for the participation of workers in hazard identification, risk assessment and determination of controls and considering input from workers in setting OH&S objectives?				
	2. Does the training and awareness program include hazard identification and control, with a focus on preventative and proactive measures? Does it address physical and psychosocial hazards and provide internal and external mechanisms to address these issues?				
	<i>If you have answered “Yes” to all Level A questions, continue to the Level AA questions. If you have not answered “Yes” to all Level A questions, assess the facility as a Level B.</i>				
INDICATOR 4 LEVEL AA	1. Does the facility encourage organizational engagement in key requirements for health and safety by integrating safety and health criteria into core business processes and practices, including:				
	a. The annual business strategy and action plan?				
	b. Purchasing decisions?				
	c. Performance appraisal processes?				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
	d. The compensation system (i.e. compensation is affected by safety and health performance)?				
	2. Are guidelines implemented for workplace design and culture that prioritize physical and psychological safety, respect, and accessibility?				
	<i>If you have answered “Yes” to all Level AA questions, continue to the Level AAA questions. If you have not answered “Yes” to all Level AA questions, assess the facility as a Level A.</i>				
INDICATOR 4 LEVEL AAA	1. Is the commitment to safety, healthy, and respectful workplaces visibly embedded throughout the facility?				
	2. Does facility management visibly demonstrate commitment to safe, healthy, and respectful behaviour and culture in interactions with employees?				
	3. Are processes in place to monitor and assess the effectiveness of training programs?				
	<i>If you have answered “Yes” to all Level AAA questions, assess the facility as a Level AAA. If you have not answered “Yes” to all Level AAA questions, assess the facility as a Level AA.</i>				
<b>ASSESSED LEVEL OF PERFORMANCE FOR INDICATOR 4</b>				<b>LEVEL:</b> _____	



	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
<b>INDICATOR 5: MONITORING AND REPORTING</b>					
<b>INDICATOR 5 LEVEL B</b>	1. Are some basic metrics on training, safety, and health monitored and reported to facility management on a regular basis, going beyond regulatory requirements?				
	2. Are key performance indicators reported or posted within the facility?				
	3. Has the facility developed an action plan to meet all Level A requirements?				
	<i>If you have answered “Yes” to all Level B questions, continue to the Level A questions. If you have not answered “Yes” to all Level B questions, assess the facility as a Level C.</i>				
<b>INDICATOR 5 LEVEL A</b>	1. Does documented physical safety and health monitoring and reporting occur, including:				
	a. Performance metrics that are clearly defined, consistently applied, regularly assessed (including against broader industry performance), and internally reported?				
	b. Performance metrics used to analyze trends for informing decisions and guiding continuous improvement?				



	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
	c. Data is collected on the number and types of reported issues related to psychological safety and respectful behaviour, with ongoing monitoring and analysis of this data?				
	d. A physical safety and health monitoring program that includes: tracking and internal reporting of leading and lagging indicators, safety and health and industrial hygiene inspection and monitoring, health surveillance, and incident investigation and follow up?				
	e. A physical safety and health audit program is in place, and compliance audits and management system audits conducted in accordance with the audit plan?				
	f. The physical safety and health monitoring and audit programs include a focus on high consequence hazards?				
	g. The facility assesses the adequacy and effectiveness of its safety and health management system annually and makes recommendations on continual improvement?				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
	h. Regular management review of physical and psychological safety and health performance takes place for the purpose of continual improvement and to inform decision-making?				
	i. Results of workplace monitoring, inspection and follow-up action are recorded and communicated within the facility?				
	j. Physical and psychological safety and health performance is communicated to the public on at least once per year?				
	<i>If you have answered "Yes" to all Level A questions, continue to the Level AA questions. If you have not answered "Yes" to all Level A questions, assess the facility as a Level B.</i>				
INDICATOR 5 LEVEL AA	1. Has an internal audit been conducted to determine whether the physical safety and health data and information collection, compilation and reporting meets the requirements of Level A?				
	2. Are thresholds and triggers related to the performance of physical safety and health critical controls in the process of being developed and implemented, with some thresholds and triggers already in place?				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
	3. Do physical safety and health monitoring and audit programs include a focus on critical controls?				
	4. Does the facility analyze aggregated and anonymized information on the response, resolution, and/or remediation of respectful workplace and psychological safety issues reported to the facility's response mechanism and conduct ongoing monitoring and analysis?				
<p><i>If you have answered "Yes" to all Level AA questions, continue to the Level AAA questions. If you have not answered "Yes" to all Level AA questions, assess the facility as a Level A.</i></p>					
INDICATOR 5 LEVEL AAA	1. Has an external audit been conducted to determine whether the safety and health data and information collection, compilation and reporting meets the requirements of Level A?				
	2. Has an internal evaluation of effectiveness been conducted, and is a tracking process in place for the improvement opportunities identified? Does this include evaluation of the quality of investigations and the close-out of actions, contributing to a culture of continuous improvement?				
<p><i>If you have answered "Yes" to all Level AAA questions, assess the facility as a Level AAA. If you have not answered "Yes" to all Level AAA questions, assess the facility as a Level AA.</i></p>					

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
	<b>ASSESSED LEVEL OF PERFORMANCE FOR INDICATOR 5</b>				LEVEL: _____



	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
<b>INDICATOR 6: PHYSICAL SAFETY AND HEALTH PERFORMANCE</b>					
<b>INDICATOR 6 LEVEL B</b>	1. Are physical safety and health performance targets set for employees of the facility?				
	2. Are targets communicated to employees?				
	3. Has the facility developed an action plan to meet all Level A requirements?				
	<i>If you have answered "Yes" to all Level B questions, continue to the Level A questions. If you have not answered "Yes" to all Level B questions, assess the facility as a Level C.</i>				
<b>INDICATOR 6 LEVEL A</b>	1. Do performance targets include on-site contractors?				
	2. Is facility management involved in reviewing, and improving performance relative to targets?				
	3. Are performance results communicated to employees and on-site contractors?				
	4. Has the facility been fatality-free in the reporting year?				
	<i>If you have answered "Yes" to all Level A questions, continue to the Level AA questions. If you have not answered "Yes" to all Level A questions, assess the facility as a Level B.</i>				
<b>INDICATOR 6 LEVEL AA</b>	1. Are performance targets set for both leading and lagging indicators?				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
	2. Does senior management review performance against facility targets and associated improvement plans?				
	3. Does the facility (or company) benchmark its physical safety and health performance against its peers?				
	<i>If you have answered "Yes" to all Level AA questions, continue to the Level AAA questions. If you have not answered "Yes" to all Level AA questions, assess the facility as a Level A.</i>				
INDICATOR 6 LEVEL AAA	1. Has the facility consistently met its continual improvement performance targets (at least three of the last four years) and is it fatality-free over the entire four-year period?				
	2. Does the facility externally audit its safety and health performance to ensure accuracy and reliability?				
	<i>If you have answered "Yes" to all Level AAA questions, assess the facility as a Level AAA. If you have not answered "Yes" to all Level AAA questions, assess the facility as a Level AA.</i>				
<b>ASSESSED LEVEL OF PERFORMANCE FOR INDICATOR 6</b>				<b>LEVEL:</b> _____	





The Mining Association of Canada | L'association minière du Canada

For more information about the TSM initiative, visit:

[TSMinitiative.com](https://TSMinitiative.com)

ou

The Mining Association of Canada

[mining.ca/tsm](https://mining.ca/tsm)



*Reproduction of this publication for educational or other non-commercial purposes is authorized without prior written permission from the Mining Association of Canada provided the source is fully acknowledged. Reproduction of this publication for resale or other commercial purposes is prohibited without prior written permission of the Mining Association of Canada.*

*©2022 The Mining Association of Canada. Trademarks, including but not limited to Towards Sustainable Mining®, TSM®, and the diamond shaped figure arcs and quadrilaterals designs, are either registered trademarks or trademarks of The Mining Association of Canada in Canada and/or other countries.*