



**Canadian Mental  
Health Association**  
Saskatchewan  
*Mental health for all*

November 22, 2021

**Workers' Compensation Act – Committee of Review**  
**Attention: Ms. Greenberg, Chairperson**

**Dear Ms. Greenberg,**

**Re: 2021 WCB Committee of Review Submission**

Thank you for extending the opportunity to provide feedback for the 2021 WCB Committee of Review. This submission is focused solely on the funding administration of provincial safety associations and the essential role of the memberships they represent. I represent a Saskatchewan employer and am a member of Service Hospitality.

The Canadian Mental Health Association (Saskatchewan Division) Inc. is a volunteer-based organization which works in partnership with communities and CMHA National to support and promote the rights of persons with mental illness to maximize their full potential; and promote and enhance the mental health and wellbeing of all members of the community. We carry out this work by building capacity of individuals, families, professionals, organizations and communities to address mental health needs. We influence the design and implementation of policies and services related to mental health. We provide services and supports that maintain and improve mental health, build reliance and support recovery from mental illness in the community. Our vision is: A Canada where mental health is a universal human right. Psychological health and safety in the workplace is a key area of focus in the work of CMHA Saskatchewan and our involvement and partnership with Service Hospitality has provided significant support to that work.

Safety Associations in Saskatchewan are funded entirely by the membership they represent. As such, each association is governed by an independent board of directors made up of representatives from that membership. These boards are elected by and accountable to the membership. Until recently, the WCB and Safety Associations operated under a funding agreement that allowed the WCB to collect the funds from employers annually and provide them to the safety associations quarterly. Other general requirements were included, such as the submission of an annual funding request, and the sharing of injury and injury cost data from the WCB to that safety association.

According to Section 146 of *The Workers' Compensation Act, 2013*, these associations have been established "...for the purpose of injury prevention and safety..." All further guidelines for Safety Associations come from the internal WCB policy, "Safety Associations (POL 06/2020)."

Over the past two years, the WCB Administration has modified these guidelines effectively creating further barriers for the safety associations. This has led to control being shifted to the WCB from the members that make up and pay for these associations. WCB's move to stricter governance has all but completely removed the authority of the association's membership, as well as has removed the association's ability to be accountable to that membership. The change has also taken away the association's abilities to shift focus and delivery in alignment with the membership's needs. As we are all aware, the last two years have been full of change, and under the current

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homeland to the Metis.*

structure, safety associations will not be able to make appropriate moves to continue to service their memberships in further times of change.

In addition to the removal of authority from the safety associations themselves, the amount of administration now required is an undue hardship on many of the safety associations. Completing the incredibly prescriptive requirements requires resources and costs far beyond what is reasonable. Those costs will not be borne by the WCB, but by the members represented by the associations. As a result, those funds will be used for WCB administration instead of injury prevention and safety.

WCB's increased authority also allows them to decide, at the individual program level, whether or not funding will be provided. Again, this now takes away the strategic direction coming from the safety association's membership and puts it in the hands of WCB. They have taken full control of employer's money and have already threatened to strip away funding from member-driven programs so they could divert it to programs and activities based on their own interests and priorities, instead of those of industry.

At the time of the development of the new Funding Agreement, the WCB Administration was disingenuous about the rationale for the new agreement. During the 4-5 years it took to develop this new agreement, WCB has put out the pretense of consultation, but never actually consulted. Since then, they have initiated a propaganda campaign to discredit Safety Associations. It also appears they are willing to abuse their authority to punish Safety Associations who have sought out legal advice.

Each safety association was created by industry to be experts in health and safety for that industry. The resources that have gone into cultivating that expertise cannot be replicated by the WCB administration. The industry has lost confidence in WCB's ability to manage these funds.

Based on the above feedback regarding the WCB's Safety Association policy, I, as a member of Service Hospitality, recommend removing WCB's oversight of the safety associations. This responsibility should be moved to an organization who will appropriately support the safety association's purpose and the membership it represents, such as the Ministry of Labour Relations & Workplace Safety or a mutually agreed upon industry association.

I truly appreciate the opportunity to provide insight on topics that concern the business community in Saskatchewan and look forward to the results of your review. If you are interested in discussing further, please do not hesitate to contact myself at [phylliso@cmhask.com](mailto:phylliso@cmhask.com) or 306-525-5601 Ext 234.

Sincerely,



Phyllis O'Connor  
Executive Director

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