

December 15, 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.

Creative Options Regina, Inc. is a growing community and social services organization employing over 300 people in the Regina region. Given the demanding work our employees face on a day-to-day basis in the provision of care for our community's vulnerable citizens, we have been actively involved with, and supported by, Service Hospitality to ensure a robust safety management system is in place to keep our COR family safe.

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 the membership, 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)."

In the past couple years, the WCB Administration has modified these guidelines, creating barriers for the associations. Their changes threaten the autonomy of the organizations and the members they represent.

In addition, a significant administrative burden has now been placed on these associations presenting new challenges. With increased administrative responsibilities, it diminishes the associations' focus on injury prevention and safety – the necessary and critical work needed by our members.

WCB's increased authority also allows for their ability to influence the work of safety associations at the individual program level, determining whether or not funding will be provided. This is concerning, as it eliminates the need for strategic direction from the safety association's membership. In essence, WCB is making decisions based on their own interests and priorities, instead of those of industry.

Each safety association was established by industry to be experts in health and safety for that industry. The resources that have gone into cultivating that expertise cannot (and should not) be replicated by the WCB administration.

Based on the above feedback regarding the WCB's Safety Association policy, I, as a member of Service Hospitality, recommend the consideration of the development of an industry-based safety council who will support the safety association's purpose and the membership it represents. This industry-based safety council will work directly with the WCB Board and not the administration, to ensure proper accountability mechanisms are in place and industry needs are met.

Thank you for the opportunity to provide insight on topics that concern the business community in Saskatchewan and I look forward to the results of your review. If you are interested in discussing further, please do not hesitate to contact me by phone at: 306-551-5170, or by email: michael@creativeoptionsregina.ca

Respectfully

A handwritten signature in black ink that reads "Michael Lavis". The signature is written in a cursive, slightly slanted style.

Michael Lavis, CEO
Creative Options Regina Inc.